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Office of the General Manager

LP I LAN900113

8 November 2023

Natasha Homsey
Energy Assessment
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Natasha,

SUBJECT: Advice on Environmental Impact Statement Central-West Orana REZ Transmission (SSI-48323210)

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to comment on the Environmental Impact Statement (EIS) for the Central-West Orana REZ Transmission (SSI-48323210). Council has reviewed the document and provides the following comments.

Council notes a significant number of the management plans that will be required to mitigate the environmental impacts of the project that have not yet been written, therefore it is impossible to fully assess the potential impacts of the project at this stage. Council strongly disagrees with the risk mitigation measures, in particular where risk ratios have been reduced due to the delivery of unwritten plans. The EIS is misleading in noting that risks have been reduced when plans have not been written. Council cannot provide a detailed and informed response to the EIS without the proposed documentation that needs to be provided PRIOR to consent for this project.

<u>Documents that are still to be written and should be provided to Council for approval/input:</u>

- Construction Environmental Management Plan
  - Aboriginal Cultural Heritage Management Plan
  - Historical Heritage Management Plan
  - Construction Noise and Vibration Management Plan
  - Soil and Water Management Plan
  - Biodiversity Management Plan
  - Construction Traffic Management Plan

- Communication and Engagement Plan
- Social Impact Management Plan
- Workforce Management Plan
- Local Workforce Participation Strategy
- Industry Participation Plan
- Australian Industry Participation Plan
- Landowner Engagement Strategy
- Pre-Construction and Construction Communications and Engagement Plan
- First Nations liaison group
- Complaints management system
- Operational Communications Plan
- Property Management Plan
- Community Wellbeing Strategy
- Bushfire and Emergency Management and Evacuation Plan
- Landscape Character and Visual Impact Management Plan
- Biosecurity Management Plan
- Vegetation Management Plan
- Riparian Vegetation Management Plan
- Operational Emergency Management Plan
- Operational Environmental Management Plan
- Traffic Management Plan
- Vehicle Movement Plan
- Driver Fatigue Management Plan
- Construction Waste Management Plan

Further to the above, Council would like to highlight the following concerns:

Workforce camps

Council requests that the Amendment Report / Response to submissions includes far more details in regard to the Workforce Accommodation Camps. Council requests the following information to be provided so that Council can provide informed feedback:

- Layout of camps
- Source of potable water
- Source of raw water
- Sewage treatment and effluent discharge processes
- Recreational facilities included in the camp

- Lighting levels
- Weather the camp is dry / alcohol free or not
- Safety measures
- Medical facilities
- Firefighting measures

The indicative construction program provided does not include Workforce Accommodation camps. Council requests these are included in a construction program as these will also have a range of impacts to be considered.

It is noted that the workforce accommodation camp site will be decommissioned at the end of the construction period. Council request that this is noted in the conditions of consent and a completion date or time period is included in this. Conditions should also note that the camp is for the workforce to support the transmission line construction project only and further utilisation for other projects will require a modification of consent.

Further, the EIS states that a small number of construction workers would utlise existing local hotel, motel and rental accommodation. It is requested that further details are provided in relation to this number including what constitutes a 'small number'.

Council requests further information in regard to the location of the workers who are constructing the Workforce Accommodation Camps. Further details in regard to the number of workers, timing and facilities that will be required should be provided.

Community consultation/engagement

Council requests EnergyCo improve its community consultation and engagement on transmission line projects. Community engagement has been lacking regarding the scale of the project and broad regional impacts. Low levels of advertising and promotion of this regionally significant project have taken place. Little engagement has taken place in Mudgee. Engagement activities in Gulgong have often been held during working hours and not in a practically participatory manner.

Also, to note is that the EIS refers to advertising undertaken in a publication that does not exist - "Gulgong Advertiser."

Transmission line placement: Council has received a number of complaints from the community that EnergyCo is not listening to their concerns about the placement of transmission lines on their properties. Community members feel that EnergyCo is not proactively engaging with them to address their issues and concerns. Council calls on EnergyCo to ensure that transmission lines are placed in a way that is respectful of current landowners and does not impact established homes. EnergyCo should also consider realigning lines where possible to avoid negative impacts on the community.

The EIS notes that EnergyCo is in the process of appointing a Network Operator and once this is completed, they will be responsible for compliance of the project and engagement with communities and stakeholders about project related matters during construction and operation. It is requested that a full hand over is undertaken between EnergyCo and the

network operator so that residents and stakeholders do not have to repeat or provide information that has been previously provided regarding this project.

Land use and property

The EIS notes around 4,000 hectares of land will be directly impacted by the construction of the project and highlights the significant impact that this project will have on landowners.

Council request that landowners are compensated fairly for the loss of their land. This means paying them the highest and best use value of their land. This will help to ensure that landowners are not unfairly burdened by the construction of the project and is in the best interests of the project and the community as a whole.

Agriculture

Council would like to note further work is required regarding impacts on and loss of agriculture as an outcome of the CWO REZ Declaration. To date, Council has noted over 8% of the region's RU1 land is now subject to renewable energy developments. Whilst some of this may continue to be utilised for farming, Council is concerned that without ongoing monitoring of cumulative impacts as land is switched from farming to renewables, there will be a significant impact on the local economy and food production.

Council requests that further work is undertaken to determine a maximum land space in the LGA that will be approved for renewable energy projects.

Council would like to see the EIS separate LGAs (Local Government Areas) for the purpose of communicating impacts on loss of agricultural land. The inclusion of large regions like Dubbo and Upper Hunter skews the data given the majority of this project's infrastructure and impact sits in Mid-Western and Warrumbungle LGAs. The impact of economic loss from loss of agricultural land is far greater in Mid-Western and Warrumbungle's areas.

Whilst soil classes are identified in the EIS, Council would like to highlight that there is no Class 1 Soil and limited Class 2 Soil in the region. Therefore, the protection of Soil Class 3-5 is important in protecting ongoing farming activities in the region. The EIS identifies that 9.9% of construction area will be on Soil Class 3, 6% on Soil Class 4 and 74.7% on Soil Class 5.

Council notes the EIS identifies that there is potential to disrupt the use of and or internal access to adjoining land during construction. Council requests that any potential disruption to farming activities is discussed with impacted landowners, no less than 2 weeks prior so that farmers can plan around this. Further, if any loss of income occurs due to disruption that financial compensation is paid to the landowner impacted.

Landscape character and visual amenity

The EIS notes no assessment is provided for the Botobolar Microwave Repeater site, no detailed assessment is provided for any locations of construction compounds covering concrete batching plants or material stockpiles noted to be sought as part of the project approval. Council requests this be included in this assessment and not delayed to the submission report stage.

Terms / abbreviations / reference document included within the report refer to the Australian Institute of Landscape Architects QLD 2018. The project is in NSW and therefore terms and source documents are required from NSW references – see terms of reference in Glossary pages viii to x, legislative / policy context (page xi) and methodology starting at page 3-11.

The visibility analysis applying a 2km project footprint assessment is based on a 3D digital terrain model and the points at the height of each tower (section 3.5.1, page 3-9, and page 6-47). When the proposed development footprint is located in an undulating rural and scenic landscape, a 2km radius is not sufficient. Council requests the landscape character and visual impact assessment be assessed at 5km either side of the proposed lines (not applied at a radius of the study area), also applying a 5km assessment for the proposed compounds, accommodation camps and associated hubs/ switching stations / microwave repeaters. This is consistent with Council's minimum development controls required under the Mid-Western Regional Development Control Plan 2013 for Visual Impact Assessments of wind and solar energy systems and should be used as a baseline requirement for this project assessment.

Consideration of total vegetation removal for easements being up to 140m wide has not been included in the assessment (despite a 'worst case scenario' that has been applied for all other parts of the assessment).

Council requests a cumulative landscape character and visual impact assessment to be carried out for the proposed development and all approved, constructed and proposed renewable energy projects in the COWREZ as part of the one document, not separately. The viewpoint assessment does not cover all public viewpoints – for example, Flirtation Hill at Gulgong, whilst stated to be 'located beyond the landscape and visual study area' (page 4-25) has wide and vast panoramic views to the north and north-west of the Gulgong township for many kilometers. This should be included under the landscape character and visual impact assessment and include not only the transmission infrastructure but all vegetation clearing, earthworks and stockpile /compound areas / camps during both daytime and night-time construction and operation (page 3-10 and under section 4.2 starting at page 4-26).

All dwellings potentially impacted should be assessed in detail, including site inspections, and included in the assessment for up to 5km either side of the project line (not a radius from the project study area) – pages 3-13 to 3-15 and appendices.

Assessment must also include land that has dwelling consent in place and vacant land that has a dwelling entitlement as part of the stage 1 visual assessment process and prior to elimination of the site / stage 2 impact assessment progressing (page 3-14 & 3-15 to Page 3-17).

Section 5.3.4 (page 5-39) Undulating rural hills landscape character type refers to 'low landscape sensitivity' and refers to areas along the highways and rural roads, used by local residents, their visitors and some tourists passing through the area. This assessment of landscape character type is not supported by Council and covers several areas of high scenic value (covering the main road entry to the historic town of Gulgong from Ulan Road / Cope Road / Golden Highway / Castlereagh Highway/ Goolma Road) to residents, their visitors and a considerable number of tourists that visit the region daily. These scenic locations and rural settings are considered areas sought to be protected by the Mid-Western Regional LEP (Local Environmental Plan) 2012 objectives. The report fails to highlight the importance of these views to both the economic and social value of the region.

Section 6.2.4 fails to identify all private air strips that operate in the area. Council requests these be identified and assessed.

Council would also like to see further details in terms of operational lighting for the energy hubs, the maintenance facility and switching stations. These are located in traditional dark sky areas and lighting will introduce a momentous change of landscape for local residents and wildlife. Of particular concern is the inclusion of 15m lighting masts with flood lights emitting up to 52,000 lumens. Council believes the Night-time visual sensitives of landscape character zones will be impacted as HIGH not Moderate as stated in the EIS. Further it is requested that should lighting have an impact on residents that solutions such as block-out blinds be provided to local residents at cost to the developer.

Biosecurity

Council requests up to date (2023) weed data be used for all Biosecurity measures. The Biosecurity Management Plan should be developed in consultation with relevant stakeholders, including the Council, State Government agencies, and local landholders. If up-to-date weed data is not available, weed surveys should be conducted to collect this information.

The EIS notes - *The frequency of vehicle movements is less in operation phase than at construction phase so biosecurity risk will be reduced.*

Council notes the biosecurity risk of vehicle movements depends not only on the frequency of movements, but also on the origin of the vehicles and the presence of weeds in those areas. Even if the frequency of vehicle movements is low during the operational phase, there is still a risk of biosecurity threats being introduced, especially if the vehicles are coming from high-risk areas.

Council requests all factors that may contribute to biosecurity risk, not just the frequency of vehicle movements be considered in the Biosecurity Management Plan and the appropriate measures implemented.

Biosecurity timing construction

The EIS notes *Biosecurity controls will be implemented during construction to minimise the risk of transport or spread of disease, pests, or weeds.*

Council requests the Biosecurity Plan be approved by Council prior to the start of construction to address specific controls during the construction phase.

New weed infestations

The EIS notes *in the event of new infestations of State priority weeds as a result of construction activities, the relevant control authority will be notified in accordance with the requirements of the Biosecurity Act 2015 and Biosecurity Regulation 2017*

In addition, Council request that all new infestations, as a result of construction activities, of priority weeds as listed in the Central Tablelands Regional Strategic Weed Management Plan 2023-2027 be reported to Council.

Biodiversity

The EIS notes that field assessments were limited to 550 ha of the 1300 ha total.

Council requests further field investigation to cover the entire area to understand the full impact of this project.

Council requests that the EIS report reflects further investigation into the presence of Koalas (*Phascolarctos cinereus*) and core koala habitat within the impacted area. As per the Koala Habitat Protection Guideline (2019), native vegetation within 5 km of a koala sighting is considered core koala habitat.

As indicated in the images from Bionet Atlas below there have been Koala sightings as recently as 2023, within the line of disturbance, that have not been considered within the report.

FIGURE 1: KOALA SIGHTINGS WITHIN AREAS OF DISTURBANCE.

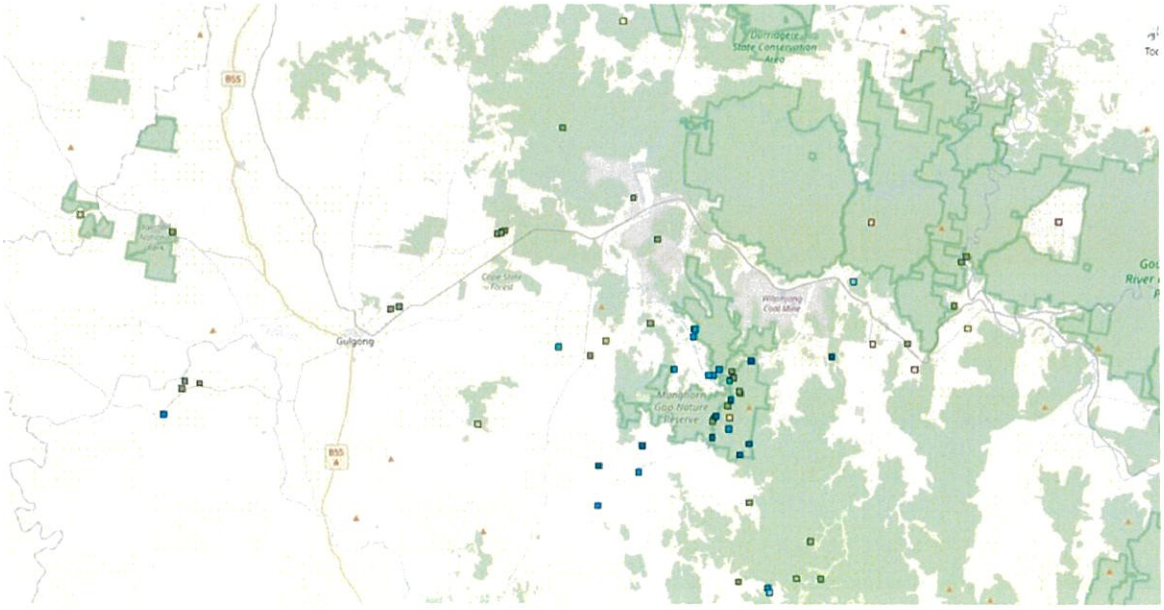
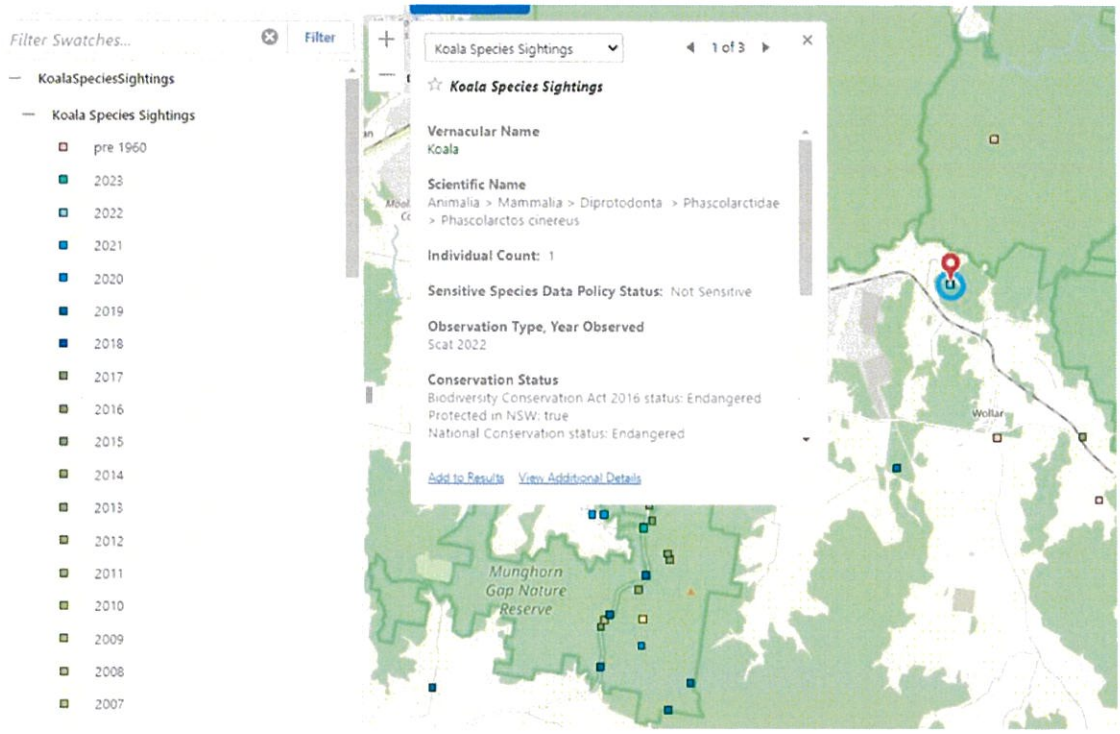


FIGURE 2: AN EXAMPLE OF A KOALA SIGHTING THAT HAS NOT BEEN CONSIDERED IN THE EIS REPORT



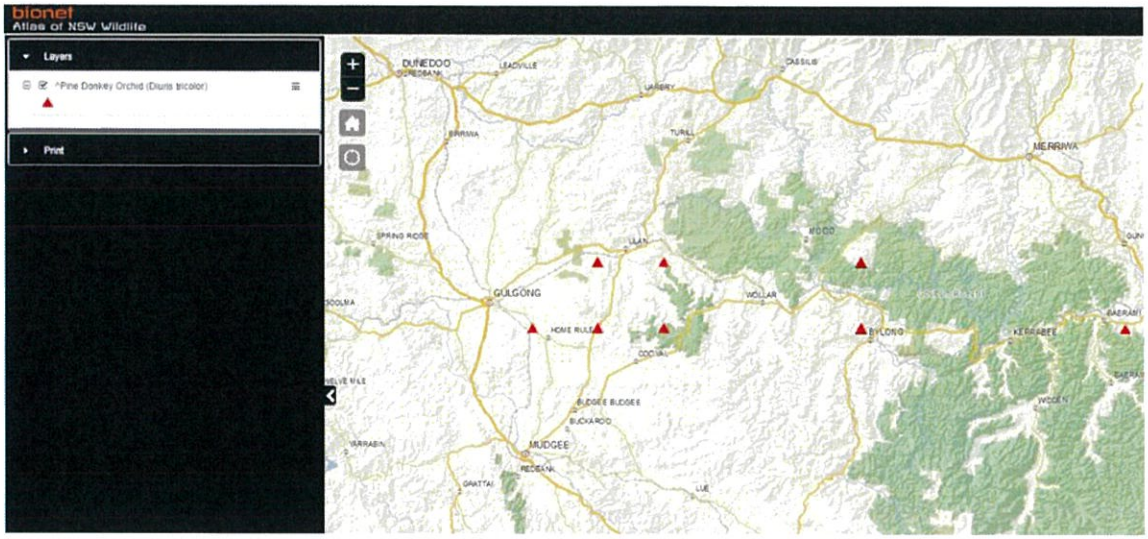
Source: https://geo.seed.nsw.gov.au/Public_Viewer/index.html?viewer=Public_Viewer&locale=en-AU&runWorkflow=AppendLayerCatalog&CatalogLayer=SEED_Catalog.238.Koala%20Species%20Sightings

The main report does not contain any explanation of the impact on Endangered Ecological Communities. Further information is required to understand the full impact of work on these communities.

The Regent Honeyeater (*Anthochaera Phrygia*) is mentioned; however, it is not included with the threatened species. As the Ulan/Wollar area is considered core habitat for Regent Honeyeaters, the impacts on habitat need to be stated within the main report.

Pine Donkey Orchid (*Diuris tricolor*) is not addressed within the report. Council requests appropriate surveillance for this plant within its growing season is undertaken. As shown in the image below, they were found within the disturbance area.

FIGURE 3: LOCATIONS OF PINE DONKEY ORCHIDS WITHIN THE AREA OF DISTURBANCE FOR THIS PROJECT



Source: https://www.environment.nsw.gov.au/atlaspublicapp/ui_modules/atlas_/atlassearch.aspx

Council notes that there is no revegetation plan for the workers camps and requests a revegetation plan prior to camp approval.

The report requires further development as to the impact of increased in traffic on native animal strikes.

Council requests the identification of the location of the Biodiversity Stewardship Sites, ensuring vegetation is being replaced 'like for like.'

Aboriginal heritage and non-Aboriginal heritage

Council notes the comprehensive field survey conducted on both Aboriginal and Non-Aboriginal Heritage within the Local Government Area.

Council supports the preparation of the *Aboriginal Cultural Heritage Management Plan* that includes the measures to mitigate and manage potential impacts on Aboriginal and Non-Aboriginal cultural heritage, archival recording and salvage where required prior to approval of the project.

An Unexpected Aboriginal Heritage Finds Procedure (UAHFP) should be developed for any confirmed or suspected Aboriginal objects identified during construction.

The incorporation of an Aboriginal heritage component into the Project's standard site induction is recommended ensuring heritage awareness for relevant personnel involved in the project.

All light and heavy vehicle movements within construction boundaries should be restricted to a single track to minimise potential impacts to significant heritage sites not yet realised.

It is also noted that any changes to the project from that presented, should be supported by an appropriate assessment to avoid, or minimise any further potential impacts.

The EIS notes blasting may occur in the vicinity of vibration sensitive heritage structures. Council requests more detailed information regarding any blasting near heritage sites.

Council requests specific mitigation measures to protect Spir Road Cottage and Laheys Creek Cemetery.

Social

This project will deliver significant disruption to the lives of many whom both live near the project and others who reside in the region who will be impacted by significant and immediate population increases. The EIS acknowledges that the community members in the region value the views, natural landscape, and agricultural surroundings. Further the sense of place in association with 'peace and quiet' will be significantly disrupted. The EIS notes that this will be temporary in terms of construction, however with a 4-year construction period, this should not be considered temporary. This is a long-term disruption to many residents in the region. Any measures that can ensure sense of place is maintained should be delivered.

Potential negative effects such as sense of safety should be addressed in the consideration of workforce makeup to include security personal at camps and large worksites. Further, a Zero Tolerance for negative social behaviour should be contained in all employment contracts of both direct and contract workers.

It should be noted that the long-term social benefits are highlighted as 'access to renewable energy sources, lowering of carbon emissions and cheaper energy,' however this is not defined on how this will be delivered directly to residents and businesses in the region. There are no current plans or polices that deliver cheaper electricity to locals in the region. This should be addressed immediately, and processes delivered to ensure infrastructure host regions benefit from lower energy costs.

The EIS notes that Mid-Western Regional Council LGA has a higher proportion of residents aged over 50 years than the overall NSW population, requiring increased access to healthcare, and recognises the extra demand that a construction workforce would place on local emergency and primary health care resources. There is already a GP shortage in Mudgee and Gulgong with long wait list times to see a GP and Southside Medical Practice no longer taking referrals for new patients as of October 2023.

Council requests that the proponent provides a proportionate amount of prescribing health professionals per capita of workforce, either GP or Nurse Practitioner (on site and via Telehealth) to provide comprehensive primary health care services to all construction workforce personnel and that this be negotiated with other renewable energy projects operating simultaneously to negate cumulative impacts on local health care services.

The majority of services likely to be required of a predominantly younger, male workforce would be medication prescription for acute illnesses or following minor injury and accidents, ongoing prescription and dispensing of antidepressant, anxiolytic and other psychiatric medications, and ongoing medication prescription for diagnosed lifestyle diseases such as diabetes and coronary heart disease.

Council requests that these ongoing primary health care services be delivered by a suitably qualified health professional, hired, and financed by the proponent for the duration of the construction period to mitigate the risk of further impacting access to healthcare services by residents. Mental Health professionals should also be engaged due to the current shortages already in the region.

Further work is required to be undertaken in relation to Cumulative impacts regarding medical and support services. Mid-Western Regional Council has recently undertaken a study showing a direct impact of increased workforce from the CWO REZ and major projects which would require an additional 8 General Practitioners, an additional 8 Emergency Department beds, 7 additional nurses and potentially up to an additional 30 paramedics to sustain current service levels in the region based on projects in the planning process.

Council also notes that internet and phone reception is intermittent around the proposed camps at Neely's Lane and Merotherie. Given the isolation of construction workers for extended periods at a time and potentially away from family and loved ones, Council requests that internet connectivity and phone services be upgraded by the proponent as a matter of social importance and for the benefit of the mental health of the construction workforce for the life of the project. Again, this should be negotiated with other renewable energy projects in the CWO (Central West Orana) REZ so that all construction workforce personnel have optimum access to internet and phone to reduce social isolation and negative mental health outcomes.

The EIS identifies impacts of the project and reducing/changing the way in which landowners would enjoy and utilise their properties. Council requests further quantification of this is provided in the Amendment report. In addition, Council would like the proponent to fund a Well-being survey in areas where there is impact to ensure ongoing monitoring in the region of the impact of such developments in regional areas.

The EIS notes the Complaints Management system will be maintained during construction and for a minimum of 12 months at the completion of construction. Council requests this is for a minimum of 5 years, if not the life of operation, so that impacted residents can raise issues as appropriate.

Further mitigation tools that should be developed include:

1. Mental Health support for residents surrounding development where their way of life has significantly changed, this includes changes to their day-to-day vista.
2. Support for farmers whose working styles are disrupted, and income impacted. This may include where new techniques need to be deployed due to change of working environment.

The EIS identifies that Monitoring of the Social Impact Management Plan (SIMP) will be provided to the projects' Community Reference Group. Council requests that monitoring is also provided to Council directly on a quarterly basis.

Council raises concern that post residual social impacts are reduced based on unwritten plans. This assessment (Table 13-20) should be updated once plans are drafted to ensure accuracy of assessment.

Council disagrees that impacts on Local Social Locality are generally low in terms of Surroundings. Whilst not all residents are physically located in the development zone, the natural environment and current farmlands form the social fabric of the region and the loss of this would impact a far broader community than those currently looking upon this.

Economic

Council notes there is very little direct economic value specifically to the host LGAs. Economic benefits are broadly to the Australian and NSW economy but not to the host regions. The majority of investment does not go to local areas, the supply chain is primarily imported goods, and the workforce will need to be imported into the region, with a low unemployment rate of 1.8%.

Council calls on EnergyCo to drive stronger investment in host LGAs to gain long term economic benefits to the regions that are facing the disruption from this project. These should include major investment in creating added support industries such as renewable product recycling or component manufacturing. NSW Government should be investing in ensuring as much of the supply chain is created in NSW (and more so in host regions) rather than the import of all major parts.

Noise and vibration

Confirmation of construction hours is sought. Recent representations to Council indicated that construction works will generally be within standard construction hours (7am-6pm weekday, 8am-1pm Saturday, with no construction on Sundays), and will only occur outside these hours in rare instances, such as needing to cross a road or rail line.

Conversely, the EIS Section 15.5 Potential Impacts, states *the majority of construction activities would generally be undertaken across a seven-day work week between 7am and 7pm, consisting of a mixture of both standard and non-standard construction hours as defined in the ICNG (Interim Construction Noise Guideline).*

Council does not support construction activities between 7am and 7pm, seven days a week, especially given the predicted exceedance of noise management levels to nearby receivers resulting from construction activities. Occasional work outside standard hours is expected, but not as standard hours. The State Government should adhere to its own rules, which it forces others to comply, and ensure standard construction hours are adopted.

Table 15-30 Additional noise mitigation measures, indicates that construction noise mitigation measures during OOH for Highly Intrusive events (exceedances >25 above NML) will be offered respite. Council would recommend that those receivers experiencing Moderately Intrusive events (exceedances 15-25 above NML) also be offered respite. The protection of nighttime ambience should be protected at all costs, but when intruded, those residents should be offered alternate accommodation.

Section 15.2.7 Mitigation Measures, Table 15-29 NV3 Construction Noise, stipulates that *If noise complaints are received, the complainant will be offered the opportunity for noise monitoring to be carried out to confirm the noise level at the receiver. Where the noise monitoring confirms that the applicable noise predictions are being exceeded, the construction methodology will be reviewed, and changes implemented to reduce construction noise levels to be compliant with noise predictions where reasonable and feasible.*

Council recommends that the same mitigation measure be offered to those residences experiencing offensive noise during the operation phase – when/if they make a complaint.

Table 15.5.4 Predicted Vibration Impacts indicates that *Potential human comfort impacts may be experienced at up to four sensitive receivers located within 100 meters of the*

construction area. These impacts are due to construction of transmission lines and access tracks which would be transient and short term.
Council requests that these 4 receivers also be offered respite accommodation during any of the predicted vibration generating activities.

Section 15.6.1 Transmission Lines, indicates that 2 receivers will exceed the Project Noise Trigger level (PNTL) from audible corona noise. This exceedance is ongoing, and not temporary during construction phase. The exceedance is rated as *moderate* and *negligible,* during evening and nighttime. As the exceedance will be ongoing and not short term.

Council requests that these receivers (*moderate* at least) are either upgraded to ameliorate noise impacts or are offered compensation/buy out.

Further, Council would like to highlight a strong shift-working economy in the region, with mining accounting for 19% of the labour force and hospitality workers accounting for 6% of the workforce. Therefore, daytime noise exceedances will have an impact on these workers who are required to sleep during the day.

In addition, Council notes that impact of noise on animals such as working dogs has not been considered. This should be addressed in the response to submissions including plans to support this. Concerns are raised as to the impact of drones and/or helicopters and other machinery and then the follow-on noise of barking dogs as a response to this disturbance.

Hazard and risk

Due to high fire risk and remote nature of sites, please ensure all Switching Stations have Firefighting equipment on site (this is not currently documented as included on these sites). All construction sites and workers camps should also have appropriate Firefighting equipment on site and numerous staff trained on utilisation of this.

Residents have concerns about fire spreading where there are BESS or Solar Panels due to limited capacity to stop fires under electrical arrangements. Therefore, surrounding neighbours should be provided (should they request) with additional firefighting equipment to help best protect their properties should a fire escape a site.

Traffic and transport

The EIS main report notes under **Traffic and transport (page vi):**
During peak construction periods, the contribution of construction vehicles would bring a noticeable change to local roads that currently carry low volumes of traffic. The volume of construction vehicles on construction routes would vary according to the type and location of construction activity at any given time in the construction period. As these roads have sufficient spare capacity, the project would only have a minor impact on the efficiency and capacity of the road network with most roads continuing to operate with a similar level of service when compared to existing traffic conditions.

Council rejects the statement that roads have sufficient capacity, and the project will only have minor impact on the road network.

This statement appears to be derived from estimations of ADT traffic counts made in technical paper 13 – Traffic and transport. The estimations of ADT in this technical paper come from crude "rule of thumb" estimations derived from estimations of peak period traffic through intersections. This is not acceptable to Council.

Council requires the proponent to amend this technical paper in accordance with the following requirements and subsequently amend all associated reports and Figures within the EIS and resubmit it for assessment.

Council requires the proponent to upgrade all existing public roads used to access the project, including road pavement, culverts, bridges, causeways and associated road and drainage infrastructure for the reasons set out in the following. This is to be at the cost of the proponent.

The necessary road upgrades are to be determined in accordance with Austroads Guide to Road Design part 3.

SINGLE CARRIAGEWAY RURAL ROADS* ANNUAL AVERAGE DAILY TRAFFIC (AADT)

Element	Design AADT	Design AADT	Design AADT	Design AADT	Design AADT
	1-150	150-500	500-1000	1000-3000	➢ 3000
Traffic lanes	3.7 (1 x 3.7)	6.2 (2x 3.1)	6.2-7.0 (2 x 3.1/3.5)	7.0 (2 x 3.5)	7.0 (2 x 3.5)
Total Shoulder	2.5	1.5	1.5	2.0	2.5
Maximum Shoulder Seal	0	0.5	0.5	1.0	1.5
Total carriageway	8.7	9.2	9.2-10.0	11.0	12.0

The proponent must determine Cumulative AADT for each access route. Cumulative AADT must account for:

- existing traffic usage (by traffic counts),
- forecast AADT generated by this project,
- trips generated from the workers accommodation (in and out of work hours), as well as
- all other SSD (State Significant Developments) projects with overlapping construction periods utilising the same routes.

Council requires all unsealed public roads used for access to be upgraded as per the above and bitumen sealed (14/7 double/double)

All road intersections and access road routes are to be assessed with swept path analysis for the largest OSOM (Over Size Over Mass), heavy vehicle to access the site(s).

Access road intersection must be assessed using Cumulative Peak hour volumes. Cumulative peak hour volumes must account not only for the trips expected to be generated by this project but also existing traffic volumes as well as all other SSD projects with overlapping construction periods utilising the same roads. Traffic volumes through intersections generated from the workers' accommodation out of work hours must also be

considered as peak hour volumes from workers going to and from the camp out of project work hours could exceed construction period volumes.

All road upgrade works must be completed prior to issuing construction approval for the energy infrastructure and will require approval under s138 of the Roads Act 1993 and are to be at the proponent's cost. The proponents will be responsible for existing service identification and relocation (if necessary) and any associated land acquisitions.

Local road upgrades

The EIS main report notes road and intersection upgrades are required to ensure safe access to construction sites and the movement of oversize and over mass (OSOM) equipment for the project.

It is asserted that the proponent may assess and determine the above road and intersection upgrades under Division 5.1 of the Environmental Planning and Assessment Act 1979 (NSW) EP&A (Environment Protection Authority) Act.

Council insists roads and intersection upgrades be assessed under s138 of the Roads Act 1993. Council will be the Roads Authority for all Local and Regional Roads. TfNSW (Transport for NSW) will be the Roads Authority for State Roads and a referral Authority for Regional Road upgrades.

Prior to issuing s138 approval Council will require from the proponent the following:

1. detailed traffic impact assessment for all intersections and mid-block routes
2. design plans to the satisfaction of the relevant road's authority
3. evidence the Applicant has completed any land acquisition necessary for the road infrastructure upgrade works
4. a detailed REF assessment, including environmental assessment and cultural heritage assessment, of any roadside environment to be impacted by the works

Access roads and tracks

The EIS main report **Access roads and tracks** (page 3-23) states:
All access roads would generally be wide enough to accommodate a traffic lane in each direction, with lanes typically between 2.5 and 3.5 meters in width. Road drainage provisions to cater for run-off from the road surface and the immediate road corridor areas would be designed for up to a 10 per cent Annual Exceedance Probability (AEP) flood event, where practicable.

Access road widths should be determined in accordance with Austroad Guide to Road Design. Road drainage provision for 10% AEP is acceptable to Council.

Stormwater and drainage

The EIS main report Stormwater and drainage (page 3-24) states: At *energy hubs a system of kerb and guttering and drains and stormwater pits and pipes would collect and discharge stormwater. On-site detention basins may be provided where required to provide slow controlled release to the nearest watercourse, and to maintain the water quality objectives established during construction as part of the construction water quality monitoring program*

(refer to Section 19.1 (Hydrology, flooding, and water quality)). The bench drainage system would cater for runoff from the bench surface, including switchyard and access road areas. Drainage would be provided in the bench grading to prevent inundation of the switchyard areas under a one per cent AEP flood event.

Council requires post development stormwater flows leaving the site(s) not exceed pre-development flows. On site detention is to be designed for all storm events up to and including 1% AEP ensuring peak discharge and volumes are not exceeded. Water quality of levels acceptable to Council must be achieved before any stormwater is allowed to be released from the site catchment(s). If flows leaving the site are likely to cause scouring or nuisance to downstream property owners then the proponent must be required to obtain drainage easement over impacted downstream properties prior tom issue of a construction certificate to give legal right to discharge over downstream property where the upstream natural surface flow is altered and concentrated by on site detention, swale, diversion channel or other such means to convey and manage stormwater runoff for the developed land.

Workforce accommodation camps

Council requires the proponent to upgrade Merotherie Rd and Neeleys Ln, including road pavement, culverts, bridges, causeways and associated road and drainage infrastructure. This is to be at the cost of the proponent.

The road pavement upgrades are to be designed in accordance with Austroads Guide to Road Design Part 3. Cumulative AADT is to be determined and used for design.

Council requires all unsealed public roads used for access are to be upgraded and sealed (14/7 double/double).

Similarly, all intersections on the road access routes are to be assessed, peak traffic through intersections generated from the workers leaving and coming back to the accommodation including out of work hours traffic.

The proponent will need to make s138 application with Council to determine the necessary upgrades. Concurrence from TfNSW will also be required for the Neeley's Ln intersection.

Construction routes and traffic volumes

The EIS main report on general construction routes and volumes (page 3-68) states construction routes that would be used on a daily basis to facilitate construction and the maximum number of movements to and from construction areas (during peak hour during the peak construction period) along these roads (including workforce accommodation camps), are shown in Figure B-3 in Appendix B (Project description mapping). Deliveries from the wider region would use the regional public road network to link with these routes. These construction routes would be reviewed during detailed construction planning.

Figure B-3 assumes peak hour traffic generation. Council rejects this assumption and requires the proponent to upgrade all existing public roads used to access the project in accordance with Austroads Guide to Road Design Part 3. Cumulative AADT is to be used, not peak hour usage. Cumulative ADT must take into account for each access route existing traffic usage, forecast ADT generated by this project, the workers accommodation (out of work hours) as well as other REZ (Renewable Energy Zone) projects with overlapping construction periods utilising the same routes.

Council requires all unsealed public roads used for access are to be upgraded and sealed (14/7 double/double).

Similarly, all intersections on the road access routes are to be assessed for swept paths of the largest OSOM, heavy vehicle and forecast peak cumulative traffic generation during construction, operation, and decommissioning phases. Peak traffic through intersections generated from the workers' accommodation outside of work hours must also be considered.

Council strongly supports the requirement that all workers consider cyclists on the road, especially on cycle trails. Cyclists are vulnerable road users, and it is important that everyone on the road takes steps to protect them.

Council suggests Installing signage and markings that clearly identify cycle trails and remind workers to yield to cyclists.

Crash data

Council requests the proponent update crash data provided in the report. This is old data (2021) and does not provide appropriate insights, in particular as Mid-Western region population has grown, so has the crashes. Further, greater consideration should be provided for cumulative impact and future crash likelihood.

Cumulative impacts and increased maintenance costs

Council has recently undertaken a study to measure the impact of additional population from the CWO (Central West Orana) REZ and associated projects (including this one) on local roads and maintenance costs. At this point in time, it is estimated that due to increased vehicles on the roads the average maintenance cost per KM will increase from $8539/KM to $13,270/KM. Council requests EnergyCo engage in discussions on how these costs will be covered into the future so that local rate payers do not have to cover this additional cost.

Environmental management

Council strongly suggests the proponent include driver education for the entire workforce and contractors, not just truck and haulage drivers. It is important to highlight unique concerns when driving on regional and rural roads, particularly regarding wildlife strikes.

Traffic and transport - technical paper 13

Council requires that technical paper 13, to be amended and resubmitted for assessment.

On page 31 it is stated ADT has been estimated with the assumption that the peak hour traffic makes up 10% of the daily traffic.

Council requires the proponent to revise the traffic and transport report to use cumulative AADT for each of the access roads, that is actual measured existing daily traffic counts, forecast AADT generated by this project during work hours, AADT generated by other SSD projects with overlapping construction periods sharing these roads as well and consider the trips from the workers camps outside of work hours.

The report is to then assess the necessary road upgrades with pavement widths in accordance with Austroads Guide to Road Design Part 3. All roads, including unsealed roads, are to be upgraded and bitumen sealed.

All road intersections and access road routes are to be assessed with swept path analysis for the largest OSOM, heavy vehicle to access the site(s).

Access road intersections must be assessed for Cumulative Peak hour volumes. Cumulative peak hour volumes must account not only for the existing conditions (by traffic count) but also trips expected to be generated by this project and all other SSD projects with overlapping construction periods utilising the same intersections. Traffic volumes through intersections generated from the workers' accommodation out of work hours must also be considered.

Waste management

Table 18.2 indicates potential waste steams including liquid waste of 300ML indicative volume for the construction period. As indicated above, Council currently operates a facility at Mudgee Sewage Treatment Plant (STP) that would require upgrades to receive waste from this commercial project. Council requests further detail regarding management of sewage and liquid trade waste including sludge management.

Council wishes to advise that none of its waste facilities are appropriate or capable of handling the disposal of landfill waste generated by the project. The Mudgee Waste Facility has limited capacity to accommodate enormous quantities of landfill material likely to be generated by the project, as the existing Waste Cell is almost exhausted. All of Councils other waste facilities are waste transfer stations accepting residential waste, which is then transported to Mudgee waste facility, they will not be suitable for waste from this project.

Any other materials requiring disposal should be discussed with the Council.

Regarding Table 18-2 Waste Streams During Construction, Council requests clarification if this is the figure per year or for the 4-year project in total? If for the 4-year project, the 2nd last point provides a nominated 2500 tonnes for mining camp waste. Council requests further information as to how this is calculated (as it appears low given that this is a 4-year project).

Table 18.3 Waste streams during operation – There is no estimate on annual waste quantities provided (other than minimal). These figures would be beneficial for Council to better understand cumulative impacts

It is noted that there are significant volumes of earthworks materials that will be required to be taken off site, with table 3.7 identifying approximately 87,000 cubic meters. Council would like to understand where this will be taken to and disposed of. To highlight is significant risk of weed spreading if taken to agricultural lands or other sites.

Other impacts

The EIS identifies that consultation with water suppliers to access the local water reticulation network is a mitigation measure for construction water supply impact. Council advises that the existing non-potable bulk water fill stations that established local water carting businesses may have current access to will not be made available to ongoing commercial projects due to capacity constraints in continuing to supply Council's own facility water supply needs. Council's potable water supply will not be available for construction purposes.

Council welcomes the opportunity to discuss potable water supply system upgrade options to support the cumulative impact of REZ/SSD projects.

Hydrology and water quality

The development will cross numerous minor streams and some first and second order streams. Final siting of towers would avoid watercourse banks where possible; this is to be established in final designs and should be provided to Council for comment. This may have a minor impact on flow paths and sediment runoff, and re-consideration of impacts will need to occur.

Flooding

Technical paper 15 provides potential impacts of construction activities on flood behaviour. This technical paper makes the following notes:

The new Wollar switching station, merotherie energy hub and Elong Elong energy hub have the potential to impact flooding and drainage patterns due to increased rate and volume of runoff from the hard surface areas; redistribute existing flows in the catchment due to diversion channels.

Increases in peak flow velocities can increase scour and erosion over downstream properties.

Council has particular concern regarding each, and all the developments noted in Table 5.1 noted as having the potential to alter flooding and drainage patterns in the receiving drainage lines or to obstruct conveyance of flow.

Reasonable regard and care must be given for the interests of downstream landowners, particularly regarding where the flow of water of land can give rise to nuisance, where the natural flow of water is altered or changes the concentration of water on land other than because of the proponent's natural use of land.

To that end Council require the proponent to undertake, prior to issue of a construction certificate for each of these components of the project noted in Table 5.1:

1. A stormwater drainage strategy with the final design to demonstrate post development flows do not exceed predevelopment flows in peak discharge and volume for all events up to 1%AEP and, where natural flows are redistributed or obstructed, demonstrate no detrimental effect to downstream landowners.
2. Acquisition of drainage easement over downstream impacted properties and have these completed prior to issue of a construction certificate, to give legal right to discharge over downstream property where the upstream natural surface flow is altered and concentrated by on site detention, swale, diversion channel or other such means to convey and manage stormwater runoff for the developed land

Contamination

Council raises concerns with the associated workers accommodation and the concrete batching plant, with questions around how vigorous the historical land use history search has been on past agricultural uses which may have heavily used pesticides.

Land Use History - The assessment of historical agricultural land uses is broad and based on a desktop assessment only. Agricultural uses have been broken into three categories

only. A more comprehensive breakdown of specific agricultural land uses is requested, with a focus on intensive agricultural activities where pesticides may have been used or stored.

Workers Accommodation – Council requires the location of the proposed workers' accommodation camp be address in the contamination assessment. The contamination assessment must specifically address the future residential land use. It is recommended that sampling be undertaken in the locations nominated for workers' accommodation.

Concrete Batching - Council requires the concrete batching plant's location be nominated and addressed in the contamination assessment.

Please submit operational details:

- Details of materials to be stored on the site
- Details of likely contaminants from oil spills, vehicle use, ground water contamination etc
- Methods to prevent contaminants from discharging from the site

Air quality

Council requests an air quality monitoring network similar to Ulan Coal Mines as depicted on page 47 Technical Paper 18, Figure 4-8 (extract below). Council understands that mitigation measures noted in Technical Paper 18 reduce emissions to low or negligible, however for baseline and future air quality reporting, Council requests air quality monitoring stations installed specifically at the accommodation camp, batching plant, unsealed roads, sensitive receivers within 350 m (539 and 543) and sporadically along construction routes. Council requests stations be erected immediately to establish a baseline for the project. The stations should be monitored 3 x day during construction and 1 x day during operation.

FIGURE 4-8 EXTRACT

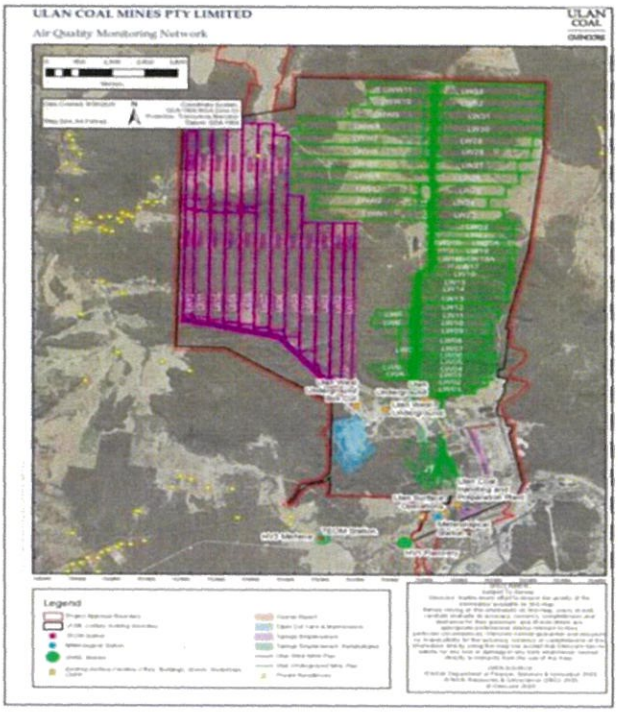


Figure 4-8 Monitoring locations at Ulan Coal Mine

Merotherie Energy Hub was not considered further in the assessment due to no sensitive receivers within 350 m. Council notes although there are no existing sensitive receivers, once construction and operations commence, 1200 workers will be inhabiting the Merotherie Camp. According to WHS (Work, Health, and Safety) laws, workers exposure to silica dust must not exceed 0.05mg/m3 over eight hour working day, for a five-day working week. Since the levels are unknown, air quality monitoring and health monitoring for workers should be implemented.

In relation to mitigation measures, Technical Paper 17 - 7.2 Recommended mitigation measures.

Council requests the use native vegetation for windbreaks to help mitigate dust emissions. Furthermore, dust emissions from unsealed roads are underestimated. Council requests the use of a water cart on unsealed roads during high wind days. Slowing a heavy vehicle will be insignificant in reducing dust emissions.

Water supply and sewage

Water supply

The EIS notes 250ML/year non potable water requirements and 450ML/year potable water requirements for the construction period of 4 years. Considering the scale of potable water consumption proposed is greater than annual potable water consumption for the Gulgong township, Council requests more detail regarding how potable water will be sourced.

Project description indicates that the enabling works, construction facilities, workforce camps will have onsite storage tanks requiring carting of potable water to each site. Council has an existing single bulk water tanker potable fill station located at Gulgong. The existing facility is utilised by established water carters to supply rural potable domestic water within the LGA

and does not have the capacity for potential cumulative impact of water carting to EnergyCo or other REZ projects without upgrade consideration.

Council advises that treated effluent reuse for non-potable construction use has not been established within the LGA and welcomes the opportunity to discuss sewage treatment upgrades to facilitate potentially 3-4ML/day non-potable water source availability.

The EIS notes during operation of the project about 1.7 megalitres of potable or non-potable water per year would be required for maintenance activities.

Council requests vegetation management and fire system servicing should be via non-potable sources only. Council's concern is the cumulative impact of servicing the operational potable water supplies of both this project and others not considered by this EIS.

Sewage management

The EIS notes that all compounds and facilities with exception of the two proposed workforce camps will have onsite septic tanks for sewage collection that will require regular transport to licenced treatment facilities. The EIS also notes that the two proposed onsite sewage treatment systems proposed for the workforce camps will not be licenced facilities and therefore inference made that all sewage waste with exception of workforce camps is to be transported to surrounding licenced facilities including Local Water Utilities facilities.

Council advises that Gulgong does not have a septic/tankered effluent receival facility. The only septic/tankered effluent receival facility operated in the LGA is at Mudgee STP (Sewage Treatment Plant). This facility has been designed to receive septage from Council's rural domestic customers and as such any capacity made available to the commercial projects covered in this EIS will need to be via consideration of STP upgrades at the developer's cost.

The EIS notes that onsite sewage treatment systems proposed for the workforce camps will still have a requirement to transport sludge produced to licenced (treatment) facilities. Council's sludge management process including dewatering at Mudgee STP is nearing capacity and as such, is currently under review for optimisation and upgrade options. Council requires further detail regarding how sludge will be managed including proposed quantities.

Appendix E

Section E3.11.2 Impact Assessment Construction Surface Water Supply

The EIS indicates that the cumulative impact regarding water supply has only included the potential overlap of two other projects and that further cumulative impact is not undertaken due to unavailability of data from other projects.

Council requests all SSD and SSI projects within MWR (Mid-Western Region) LGA and surrounding LGA's, be considered for the impact assessment, including coal mine expansions and a silver mine and Councils Urban Growth Strategy.

Council disagrees that construction water impact is a low risk and requests that significant more investigation is carried out and a detailed assessment on the risk of be undertaken PRIOR to consent for this project.

Cumulative Impacts

The EIS notes in table 20-1 and page 20-47 relevant future projects with the potential for cumulative impact.

Council requests this to be updated with accurate information and include all projects that are in the planning portal with potential overlap, including but not limited to, multiple coal mine extensions, Mayfair Solar, Barneys Reef Wind Farm, Beryl BESS (Battery Energy Storage System), Wollar Solar, Narragamba Solar, Bellambi Heights BESS, Burrendong Wind Farm, Spicers Creek Wind.

Further, regarding roads, the cumulative impact assessment should include other major projects that are using the same roads such as renewable projects in Orange, Oberon and beyond.

In addition to the above, Council wishes to ensure significant consideration of this proposal's cumulative impacts in conjunction with other approved and upcoming major projects in the region.

The assessment should include, but not be limited to, the following cumulative impacts:

- Environmental impacts of the project, including but not limited to cumulative flora, fauna, and habitat loss, particularly impacts on threatened species, increased risk of grass fire escape and spread with loss of woodland communities, greater potential for bio-security impacts such as weed dispersal and new incursions on the site and surrounding agricultural areas, increased risk of feral animal incursion and impacts to stock, wildlife and human safety, groundwater impacts, contamination effects, waste disposal impacts, and cultural heritage impacts including Aboriginal and European heritage
- Visual impacts of multiple renewable projects on private properties, important local features, and the public domain
- Land use conflicts resulting from multiple renewable projects in the area, which may affect primary production and rural-residential land uses
- Transport and traffic impacts arising from multiple renewable projects on State, Regional, and local roads. This includes the significant increase in maintenance and resources required by the Council for project-related roads during both the construction and operation phases
- Tourism impacts that affect local accommodation availability and the unique character of the Gulgong area. The area's appeal to tourists relies on its strong connection to heritage significance, scenic rural landscapes, and agriculture
- Economic impacts, including effects on agricultural land availability, property devaluation, and reduction in the supply chain of local services and materials needed for other local construction projects
- Acoustic impacts resulting from multiple renewable projects close to residents, as well as increased traffic movements
- Social and amenity impacts the community with a large workforce, including unskilled workers temporarily located in the region to support the projects
- Consideration of medical, educational, and other social service impacts should be considered

Council also requests the Cumulative Impact Study should also include a more detailed discussion of water supply and sewage management. This should include a cumulative

analysis of potable water requirements by all projects, as well as raw water required. Further, a cumulative impact study should also include sewage generated by projects as this has a significant impact on capacity and availability of current infrastructure.

Other Comments

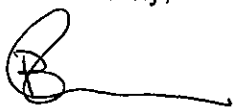
Council would like further clarification in regard to the ongoing Operational Workforce of 50 to 60 roles (There are two different numbers for this throughout the EIS). The EIS states these will be a combination of office and site-based roles. Can the proponent confirm that the Office-based roles will be located in the CWO REZ and not in a city location? If proposed to be city-based, please advise what local workforce will remain once operational in the region.

Council raises concerns of risk of resource shortages in the region and requests the proponent ensure a total resource drain on local suppliers does not take place. This includes and is not limited to road base, crushed sandstone, blue metal, food, and medical supplies. Council requests a Resource Management Plan is put in place and if shortages of these materials take place and impact local residents and businesses, that the proponent take an active role in supply chain solutions.

Table 3.8 provides an indicative quantities and resources for construction. The table outlines anticipated source/origin however the details are too vague to understand potential routes for the delivery of materials. For example, "Central West" as a source is very vague as this is a large region and essentially there is no valuable information in this. It is requested that this information is updated, and more detailed sources are provided to understand further traffic and other movements in the region.

Should you have any further enquiries regarding this matter, please contact Council on (02) 6378 2850

Yours sincerely,



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