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Our Reference: OUT-8665/23



6 November 2023

Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

**Attention:** Ms Natasha Homsey

Dear Sir/Madam,

**SUBMISSION IN RESPONSE TO THE PUBLIC EXHIBITION OF THE CENTRAL-WEST ORANA REZ TRANSMISSION PROJECT ENVIRONMENTAL IMPACT STATEMENT (EIS)**

Upper Hunter Shire Council ('Council') welcomes the opportunity to comment on the public exhibition of the Central-West Orana REZ Transmission Project EIS. Council is of the understanding that the project built infrastructure within the Shire will be limited to one 330Kv line and one 330kV switching station to the west and north of Cassilis.

**1. Impacts on agricultural activities**

Council notes that the construction area for the project is circa 3,660 hectares, which will be unavailable for agricultural use during construction, and that around 825 hectares of agricultural land will be permanently removed from service due to the establishment of permanent infrastructure. The Social Impact Assessment (SIA) appears to have given little weight or consideration to the social effects of the interruption of traditional agricultural activities. Mitigation measures need to be in place, and we request that the Department ensure that the landowners and the public in general have access to information and assistance through transparent and easily accessible channels.

**2. Accommodation strategy**

The technical paper on social impacts provides a chapter on construction assessment which notes that the entire construction workforce (peaking at 1800) will be housed in accommodation camps in Merotherie and Cassilis. Council requests that further consultation is undertaken to develop a detailed accommodation strategy which addresses community concerns and outlines the methodology for construction and operation of the camps.

**3. Traffic and Transport**

- a) We note that Technical Paper 13 – Traffic and transport does not consider the traffic impacts of the project on transport routes outside the project area. In this regard, Section 5.1.5 states that construction of the project would require the transportation of large and/or heavy equipment via road that would constitute OSOM movements. The majority of OSOM vehicle would travel from the Port

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of Newcastle to the energy hubs via the Hunter Expressway and Golden Highway. As the Golden Highway passes through Merriwa, it is likely that construction traffic will adversely impact the efficiency and capacity of roads within Merriwa as well as impacting local amenity. At this stage, the extent of these impacts is unclear. In addition, given the number and scale of projects planned for the Central-West Orana REZ over the coming years, the material cumulative traffic and transport impacts on Merriwa could be significant. In our view, further investigation of the potential cumulative traffic and transport impacts is warranted including an assessment of the capacity of Merriwa's main street and potential impacts on local roads that are currently used as a OSOM heavy vehicle bypass.

- b) We note that there are several local roads that form part of the construction routes that have not been quantitatively assessed, given that they would primarily function to provide access to the transmission lines' access gates only (Appendix A of Technical Paper 13 – Traffic and transport). Construction vehicles utilising the transmission line access gates would typically be limited to 32 vehicles per hour (12 light vehicles and 20 heavy vehicles) during the peak period. Technical Paper 13 states that these low additional demands (an arrival of approximately one vehicle every two minutes) are not likely to adversely impact the performance and capacity of the road network. These roads would be subject to the routine road condition inspection discussed in Section 5.2.6.

Council is concerned that the increase in vehicle movements, particularly heavy vehicles, on local roads is significant and will adversely impact the condition of the roads, increasing maintenance requirements and shortening the life of road pavements. As such, it is recommended that the developer be required to undertake detailed pavement investigations of local roads that form part of the construction routes to determine if upgrades are required to meet the proposed traffic loadings. In addition, Council requires assurance that the nominated local roads will be maintained by the developer, at the developer's cost, during the construction phase of the project.

- c) Appendix A of Technical Paper 13 identifies Ancrum Street, Cassilis as a local road that will be utilised by construction vehicles. We note that Ancrum Street is a narrow residential street without footpaths that provides access to a local school. The street contains a 40km/hr school zone. Council is concerned that the increase in vehicle movements along Ancrum Street during the construction phase of the project will pose a safety hazard for local school children. Accordingly, consideration should be given to the implementation of local traffic management measures in Cassilis such as the construction of a footpath along Ancrum Street and the installation of flashing lights at each end of the school zone to ensure the safety of pedestrians including school children.
- d) Council wishes to see project consent conditions stating that the proponent must:
- i) upgrade local roads, bridges, grids, intersections and other related road infrastructure that will be impacted by the project and which require modification in the reasonable opinion of Council, in accordance with plans approved by Council, prior to any project construction work commencing; and
  - ii) if, during the life of the project, Council provides evidence of significant increases in traffic volumes or vehicle types on other roads in the locality that can be directly attributable to the project, the proponent agrees to reach a negotiated settlement with Council to provide additional funds for road repair, maintenance or upgrade works.

#### **4. Community Engagement**

The community has expressed its disappointment that there were no drop-in sessions regarding the EIS in Cassilis, despite a number of social impacts on the Cassilis community being given a high to medium rating. Overall, there has been very little consultation with the Cassilis community despite the engagement requirements specified in the SEARS.

## 5. Waste generation

Council has very limited capacity to accept waste in the project area within Upper Hunter Shire. We request that a detailed Waste Management Plan be prepared in consultation with Council staff prior to the start of construction.

We trust the above comments will be given due consideration by the Department in its assessment of the proposed development.

Please do not hesitate to contact Mathew Pringle, Director Environmental & Community Services, should you have any questions regarding the content of this submission.

Yours faithfully

A handwritten signature in black ink, appearing to read 'G. McDonald', written in a cursive style.

Greg McDonald  
**GENERAL MANAGER**