

7 August 2024

PN:482500

Ms Megan Ramsdale Department of Planning, Housing and Infrastructure Via NSW Major Projects Portal

Dear Ms Ramsdale

SUBMISSION - RIDGEY CREEK BATTERY ENERGY STORAGE SYSTEM (SSD-48756517) AT 822 HENRY PARKES WAY, 19 PAT MEREDITH DRIVE AND HENRY PARKES WAY, PARKES

Thank you for the opportunity to provide a submission to SSD-48756517 for a Battery Energy Storage System (BESS) at 822 Henry Parkes Way, 19 Pat Meredith Drive and Henry Parkes Way, Parkes.

It is understood the key elements of the project includes:

- Construction of a 130 MW / 260 MWh BESS.
- Construction of a new bay at the Parkes substation to facilitate connection of the BESS to the existing Transgrid substation.
- Installation of a 132 kV underground cable connecting the BESS to the new bay.
- A 12 month construction period, followed by a 30 year operational life.
- A peak of 50 workers during stage 3 of construction and 2 ongoing operational workers.

Parkes Shire Council makes the following comments in relation to the proposed development:

1. Community Contributions

Parkes Shire Council and the Developer have agreed in principle to secure a Planning Agreement prepared in accordance with Subdivision 2 of Division 7.1 of Part 7 of the Environmental Planning and Assessment Act 1979 (NSW) (Act).

The Developer wishes to make, and Parkes Shire Council (PSC) wishes to receive, Development Contributions for the benefit of residents and ratepayers and to do so efficiently and equitably through the management services provided by PSC, with input from the community and the Developer.

The Developer commits to paying to PSC Development Contributions to the total value of \$680,000 (2024 dollars, indexed to CPI). Indicatively, the Development Contributions will be allocated 95% to community benefit projects and 5% to administration.

The objective of the Planning Agreement is to facilitate the delivery of the Development Contributions to Council for the provision of public benefits. The Developer, PSC and the local community representative in Council-initiated meetings will frame the evaluation criteria for the





selection of suitable 'public purpose' projects including factors such as population in the project catchment, scope and versatility of the project to deliver different community benefits, enhancement of social wellbeing, improvement in education and skills in the local population, etc so that it leaves a lasting, substantive legacy

The Planning Agreement will include provisions for the public recognition by Council of expenditure of the Development Contributions provided by the Developer.

To avoid any doubt, the Developer will pay for all road upgrade and 'make good' road maintenance costs associated with the Project's construction, upgrading/refurbishment and decommissioning phases, as required by Conditions of Consent and also as required under Council's statutory responsibilities as the local Roads Authority. Such payments lie outside the ambit of the Planning Agreement.

Council reserves the right to allocate some of the Development Contributions to routine road maintenance requirements during the standard, routine operational phase of the project.

It is noted on Page 24 of the EIS that the "anticipated operational life of the BESS is 30 years but may be extended with equipment replacements". Council reserves the right to seek an updated Planning Agreement should the development be extended beyond the nominated 30 year lifespan. The development consent should be time limited to a period of 30 years to ensure a new Planning Agreement can be negotiated.

2. Parkes Special Activation Precinct

The new bay and associated 132kV underground cable which are located on the southern side of Henry Parkes Way, on Lot 1 DP 717829 and Lot 409 DP 750152 will be located within the Parkes Special Activation Precinct.

Consultation must be undertaken with the NSW Regional Growth Development Corporation (RGDC) to ensure the appropriate approvals including an Activation Precinct Certificate (APC) are obtained.

3. Access and Traffic

It is acknowledged that the proposed access onto Henry Parkes Way and associated intersection treatments are under the care and control of Transport for NSW. However, comments are provided below with respect to minimum engineering requirements from a Council perspective.

Based on the submitted plans and details submitted in support of the EIS, works are proposed to be undertaken at 822 Henry Parkes Way, Parkes for the BESS and upgrades to the Substation that is opposite the proposed site on Henry Parkes Way.

Works at the BESS require the construction of the facility's access, in addition to the establishment of plant and equipment, earthworks and preparation of plinths and slabs, delivery of batteries, inverters and transformers, harmonic filter equipment, and a switch room.

Council requires further details to adequately quantify the impacts of the development, namely:



- a. The transformer transport route assessment only shows one prime mover, whereas Figure 13: OSOM Transformer Delivery vehicle shows 2 Prime movers at the front and one to the rear of the indivisible load. An updated route assessment must be provided to Council that includes the swept paths for the whole OSOM heavy vehicle combination along the entire route and to access into the project site.
- b. The access design is to be revised to have gates setback a minimum of 26 metres from the property boundary to permit a B-double vehicle to fully stand within the property boundary and not overhang onto the road reserve while any access gates are being opened or closed. This must be identified on the plan, with the gate location also included.
- c. The BAR/BAL must be redesigned to accommodate a B-double, as the storage length has been set as the 19m design vehicle. The 19m vehicles is not representative of the largest expected vehicle to access the site, and the expected frequency of B-double Heavy vehicle movements precludes the acceptance of a lesser storage slot.
- d. McGrath's Lane intersection, Pat Meridith Drive intersection and the entrance to the BESS all have localised shoulder widening to accommodate either a BAR/BAL and are in close proximity to each other. Council requests that a consistent widening of the shoulder along Henry Parkes way encompassing all intersections be undertaken to provide safe and clear passing lanes.
- e. Prior to the commencement of works and throughout construction advisory signs shall be located at the approaches to the access location and the Henry Parkes Way/Pat Meredith Drive, indicating high volumes of turning heavy vehicles.
- f. B-double swept paths for ingress/egress show encroachment into the BAR treatment; the access and intersection treatments must be redesigned so that a turning movement does not result in the encroachment of the BAR widening. The purpose of the BAR is to enable a vehicle in the through traffic stream to pass whilst a B-double is negotiating a turn; the layout, as detailed, does not allow this and instead creates an additional conflict point with the through traffic as passing is negotiated.
- g. Impacts on Council's local roads is a major concern, yet difficult to assess given the information provided to date. Council requires more comprehensive, fully itemised heavy vehicle and OSOM vehicle.
- h. Impacts on Council's local roads is a major concern, yet difficult to assess given the information provided to date. Council requires more comprehensive, fully itemised heavy vehicle and OSOM vehicle information as follows:
 - OSOM: number of trips in and out, lengths, weights and axle configurations.
 - Heavy Vehicles: number of trips in and out, lengths and weights and axle configurations. Including trips for infrastructure equipment, earthworks, gravel, concrete, waste management (solid and liquid).

To be clear, this preliminary assessment is subject to an examination of the additional information as requested above and thus may change.

i. Independent dilapidation surveys must be undertaken to Council's satisfaction prior to any project construction works commencing. The scope of works for such surveys must be to Council's prior written approval. Independent dilapidation surveys must also be completed



upon completion of construction of the project. The Developer must be fully responsible for funding the repair of any damage to any Council road, as determined by Council.

It should also be noted that independent dilapidation surveys and the process outlined above is required for any subsequent, upgrading/refurbishment works during the operational life of the project and pre and post decommissioning of the project.

j. Council requires the developer to provide frequent and timely project updates for the totality of the construction period. Traffic Management Plan(s) must be submitted to Council for its prior approval, before the commencement of any construction work.

4. Stormwater Management

Council notes that the EIS submission referred for review does not include any provision or detail on the internal site drainage or any measures to mitigate additional stormwater discharge and augmentation of the site's drainage characteristics.

Council requests that the proponent quantify the additional stormwater runoff volume and submit mitigation measures for 5% AEP and 1% AEP. Both items need to be calculated on the latest climate change adjustments. In addition, on-site detention, water quality assessment, and internal site drainage measures are to be submitted for the consideration of the Director of Operations prior to commencement of construction.

Council requires that a drains model be provided that allows verification that pre- and postdevelopment flows are equal (or lessened) given the localised stormwater issues at the Ridgey Creek crossing with Henry Parkes Way. To manage the stormwater risk to the site access, Council requests that the Proponent construct stormwater culverts underneath McGrath Lane to reduce overland flow impacts across this intersection.

In addition to the management of site drainage post-construction, Council needs to be assured that the stormwater discharge and soil transport are adequately managed during the construction process. Council requires an Erosion and Sediment Control Plan that adequately demonstrates how the contractor undertaking the works will prevent sediment transport from the site and manage the volume and quality of incidental and upstream drainage for the whole period that the site is disturbed. An Erosion and Sediment Control Plan must be submitted for the consideration of the Director of Operations prior to commencement of construction.

5. Environmental Management

It is identified that the proponent has committed to preparing a Construction Environmental Management Plan, an Operational Environmental Management Plan, Waste Management Plan and Decommissioning Environmental Management Plan.

The suite of Environmental Management Plans shall be referred to Council and other relevant authorities for review, comment and approval.

6. Emergency Management

An Emergency Management Plan is to be prepared by the proponent in consultation with Council and other relevant authorities including the NSW Police, NSW Fire and Rescue, Rural



Fire Service and the like prior to operation of the facility. The Emergency Management Plan must consider all potential hazards impacting on the site and occurring from the development such as flood, bushfire, localised fire from the BESS's potential risks associated with the failure of infrastructure associated with the BESS's including potentially hazardous fuels or chemicals.

7. Project Renewal / Decommissioning

It is recognised the estimated lifespan of the development is 30 years. The EIS states that periodic replacement of infrastructure may occur extending the lifespan of the development. Prior to any upgrades or decommissioning of the facility the beneficiary of the consent is to undertake an existing condition analysis of the existing road network and a dilapidation report at the completion of the works. Any necessary upgrades to restore the infrastructure to its original condition are to be undertaken by the proponent.

It is recognised that a Decommissioning Management Plan is to be prepared to identify opportunities to minimise waste, maximise recovery, and effectively manage waste that cannot be recycled or repurposed. Council seeks quantification of the scope and extent of decommissioning works, including traffic and road impacts, likely workforce requirements and duration of decommissioning works.

8. Project Communications

The proponent must develop and implement a Council Engagement Strategy in collaboration with Parkes Shire Council. This strategy should ensure that key milestones and updates of the project are effectively communicated to the public. The strategy must include the following elements:

- I. **Regular Updates:** Provide timely and regular updates to Council through agreed communication conduits that are comprehensive and transparent.
- II. **Public Meetings:** Organise public meetings and forums at key stages of the project to inform and engage with the community, address concerns, and gather feedback.
- III. **Feedback Mechanism:** Establish a clear and accessible feedback mechanism to allow community members to voice their opinions and ask questions about the project.
- IV. Transparency: Ensure transparency in all communications, providing detailed information about project progress, potential impacts, mitigation measures and open and transparent responses to questions posed by the community.
- V. **Collaboration:** Work closely with Parkes Shire Council to align the engagement strategy with the Council's community engagement practices.
- VI. **Social Media Formats:** Structure information provided to the Council to be suitable for social media formats, enabling Parkes Shire Council to effectively disseminate updates and milestones through its social media channels.

The Council Engagement Strategy must be submitted to Parkes Shire Council for approval prior to the commencement of the project and be reviewed and updated as necessary throughout the project lifecycle to address emerging issues and community feedback.

Should consent be granted to the proposed development Parkes Shire Council requests the conditions in Attachment 1, or conditions of a similar nature, be imposed on the Development Consent.



If you require any further assistance, please contact Council's Director Planning and Community Services, Brendan Hayes on (02) 6861 2373.

Yours faithfully

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Brendan Hayes DIRECTOR PLANNING AND COMMUNITY SERVICES



ATTACHMENT 1 - RECOMMENDED CONDITIONS OF CONSENT

Council requests appropriate conditions of consent be imposed on any future development consent addressing the following matters:

- Voluntary Planning Agreement (specifically as follows)

The beneficiary of the consent commits to paying to PSC Development Contributions to the total value of \$680,000 (2024 dollars, indexed to CPI). An initial payment of \$250,000.00 is to be made within thirty (30) days of commencing construction works. An annual payment of \$21,500.00 (plus CPI) is to be paid no later than thirty (30) days after 31 May for each of the following years.

- Time limited consent 30 year maximum
- Road and access upgrades
- Preparation of Environmental Management Plans (CEMP, OEMP, DMP, WMP)
- Development of Stormwater Management Plans
- Undertaking of a pre and post construction / decommissioning Dilapidation Report and subsequent upgrade works
- Decommissioning works