



MID-WESTERN REGIONAL COUNCIL
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Office of the General Manager

LP | LAN900162

23 September 2024

Megan Ramsdale
Energy Assessment
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Megan,

**SUBJECT: BERYL BATTERY ENERGY STORAGE SYSTEM (SSD-61460977)
ENVIRONMENTAL IMPACT STATEMENT ADVICE**

Thank you for providing the Mid-Western Regional Council (Council) with the opportunity to provide input into the Environmental Impact Statement (EIS) for the proposed Beryl Battery Energy Storage System (BESS). Council has reviewed the documents and would like to provide the following feedback for consideration.

Workforce and Accommodation

The EIS notes (3.5.3) approximately 40 fulltime equivalent jobs will be required during the peak construction period, with 95% of the workforce from outside the study area.

The proponent recommends several accommodation options, possible use of pre-existing temporary workers accommodation, explore housing that is not on the local rental market and using private and commercial rental accommodation.

Council is not able to provide relevant feedback on suitability of the accommodation strategy due to no options being confirmed. Council requests a specific detailed confirmation of the accommodation strategy be developed and approved by Mid-Western Regional Council prior to issuing consent of the project.

It should be noted that Council does not support the use of tourist and visitor accommodation for the construction workforce. It is also requested that the Proponent consider the status and timing of all other state-significant developments within the Mid-Western Region to minimise any adverse cumulative impacts.

Assessment of impacts

The EIS notes (7.1.3.3) Native Vegetation and (7.1.3.4) Threatened Ecological Communities (TEC) are not present within the site. Furthermore, Appendix E – BDAR 4.6 Threatened Ecological Communities explains this decision by stating the following:

“These listings apply to grassy woodlands and derived grasslands in which one or more of White Box (*Eucalyptus albens*), Yellow Box (*E. albens*), and Blakely’s Red Gum (*E. blakelyi*) are dominant or co-dominant. The local occurrence of PCT 281 is dominated by Rough-barked Apple (*Angophora floribunda*) with no evidence of White Box, Yellow Box, or Blakely’s Red Gum within or near the site. For this reason, these CEEC listings do not apply to the local occurrence of PCT 281 and no TECs occur within the site.”

PCT 281 is a Critically Endangered Ecological Community: The TEC’s name is as aforementioned, but the PCT ID is Rough-Barked Apple-Red Gum-Yellow Box Woodland which contradicts the above statement.

Council requests clarification to ensure appropriate offsets are addressed pending PCT identification.

Water

The EIS notes (7.8.3.5) estimated volumes of construction and potable water to be trucked in from a private commercial supplier. Council advises that water carting from Council water sources (both potable and non-potable) is currently under review with consideration of the potential cumulative impact that SSD project demands may have on existing Council source water allocations as well as infrastructure capacity. Council provides potable water supply to the urban communities within the local government area and does not commit to a Level of Service suitable for water carting outside of the urban areas. As such, should commercial water carters seek approval to cart water to specific SSD projects, at the time of application (Section 68 LG Act), Council will consider the ability to supply while maintaining security of water supply for the existing urban communities.

Waste

The EIS note (7.12.3.1) due to the very low quantities of general solid waste and recyclables that are generated that these materials be collected by existing local commercial waste collectors for transport to Mudgee waste facility.

Council is disappointed in the lack of detail regarding waste and therefor request a detailed waste strategy be developed and approved by Mid-Western Regional Council prior to issuing consent.

Liquid waste

The EIS notes (7.12.3.1) it is proposed that liquid waste be disposed of at the Gulgong Sewage Treatment Plant. Council advises that liquid waste cannot be received at Gulgong STP. The only sewage treatment Plant with a tankered waste Receival facility in the Mid-Western LGA is Mudgee STP. Mudgee STP has limited capacity to receive liquid waste via truck and as such it is suggested that commercial waste carting businesses are consulted to establish frequency of potential servicing during design of onsite sewage management.

Traffic, Transport and Accessibility

The Traffic and Transport Impact Assessment notes (4.10.2) the detailed route on pages 37 and 38 are at large variance to route descriptions in the document and the Figure 4.8.

Council requests the written description match the map in Figure 4.8 and do not support the written route passing through Gulgong via Mayne St and using Wollar Road and Ulan Road.

Park and Ride

It must be noted that Council does not support "park and ride" type purposes on public land due to insufficient car parking available in the region, and no public car parks or public road infrastructure are to be used for park and ride.

Decommissioning

The EIS notes (3.7) A Decommissioning and Rehabilitation Plan will be prepared in consultation with the Associated Landowner prior to the cessation of operations.

Council requests the decommissioning and rehabilitation plan also be prepared in consultation with Council prior to consent.

Council also requests that such a plan includes the following, at a minimum:

- The anticipated present value cost of decommissioning works, along with an explanation of the calculation of that cost (including a buffer for changes in market values/ inflation).
- The physical plan for decommissioning, prepared or certified by an engineer, confirming that full remediation/ restoration of the site to its former primary production use/ class land capability is possible.
- Commitment to a financial security to cover the cost of decommissioning.
- Management and waste reduction initiatives as to where generated waste will be disposed and/or recycled, without impacting on local waste facilities and in accordance with:
 - Protection of the Environment Operations Act 1997
 - Protection of the Environment Operations (Waste) Regulation 2014
 - Waste Avoidance and Resource Recovery Act 2001
 - NSW Environment Protection Authority (EPA) Waste Classification Guidelines

Ideally, the above information should be updated every 5 - 7 years to keep up with changes.

Cumulative Impacts

In addition to the above, Council wishes to ensure significant consideration of the cumulative impacts of this proposal 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. This should encompass all State Significant Developments, not just wind projects.
- Land use conflicts resulting from multiple renewable projects in the area, which may impact 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 requests the Proponent to engage with Mid-Western Regional Council to discuss a formal Voluntary Planning Agreement.

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

Yours sincerely,

A handwritten signature in dark ink, appearing to be 'BRAD CAM', with a stylized flourish extending to the right.

BRAD CAM
GENERAL MANAGER