

6 December 2024

Department of Planning, Housing, and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Re: SSD-8825-Mod-4 – BESS and Increase Development Footprint

Dear Sir/Madam,

The Department of Planning, Housing, and Infrastructure (DPHI) is in receipt of SSD-8825-Mod 4 for a Battery Energy Storage System (BESS) and increase in development footing at the approved Gregadoo Solar Farm. Wagga Wagga City Council has been requested to provide advice for consideration for the proposal, including details of any key issues and assessment requirements.

It is understood that the modification seeks to make the following changes to the approved project:

- Addition of a BESS with a capacity of 200MWAC and 400MWh.
- Construction of an additional site access point.
- Construction of an internal access track.
- Minor changes to the wording of the consent to reflect current terminology including:
 - Amend the definition of EIS to include Gregadoo Solar Farm Modification 4 Application dated 27 September 2024.
 - Amend Schedule 3, Condition 1 to remove the restriction on battery storage within the project site.
 - Delete the term “Over-dimensional vehicle” and corresponding definition.
 - Introduce the term “Heavy vehicle/s requiring escort” including the definition “Any vehicle that requires a pilot vehicle and/or escort vehicle, as defined by the National Heavy Vehicle Regulator’s NSW Class 1 Load Carrying Vehicle Operator’s Guide”.
 - Amend Schedule 3, Condition 2 (a) to increase the number of heavy vehicle movements per day from 50 to 120 during construction, upgrading and decommissioning, and to increase the number of Heavy vehicle/s requiring escort per day from 2 to 4.
 - Amend all references to ‘over-dimensional vehicle/s’ in the Schedule 3 Condition 2 of the Development Consent to ‘Heavy vehicles/s requiring escort.’
 - Amend Appendix 1 to include an updated overall layout plan.

Traffic Generation

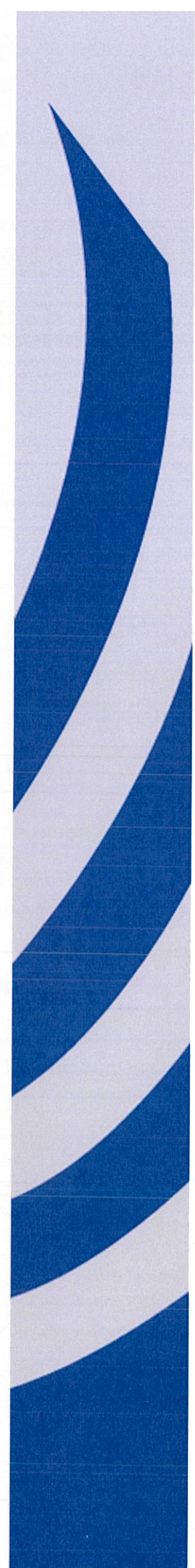
- Council is concerned the assessment has not adequately considered the potential cumulative impacts on the wider area. It is considered that increasing heavy vehicle movements from 50 per day to 120 per day over the construction, upgrading or decommissioning period is a significant increase in heavy traffic loadings.
- A particular concern is the proposed increase in traffic generation on unsealed roads in the context of approved and potential further development along Boiling Down Road, and the cumulative impacts on Boiling Down Road and Redbank Road during the construction period.
- Concern is also raised with the significant impact on local traffic flows and on Councils maintenance and renewal program for the wider local road network given the increase heavy vehicle movements.
- Concern is raised with the potential increase in dust generation caused by the potential amendment to heavy vehicle movements. Council recommendation remains that Boiling Down Road and Redbank Road are required to be upgraded and sealed. Use of a watercart to suppress dust is not an adequate solution in this instance.
- The Gregadoo Waste Management Centre (GWMC) is an existing traffic attractor that is situated adjacent to Boiling Down Road. Boiling Down Road is used as an alternate heavy vehicle route to Gregadoo Road for heavy vehicles travelling from Plumpton Road towards the GWMC as they do not need to travel through a School Zone and residential areas.
- Given the proximity of the Boiling Down Road intersection with the GWMC main entrance, what is the potential impact on traffic flows into/out of the GWMC?

Environment

- Concern is raised with the potential increase in dust generation caused by the potential amendment to heavy vehicle movements. Council recommendation remains that Boiling Down Road and Redbank Road are required to be upgraded and sealed. Using a watercart to suppress dust is not an adequate solution in this instance.
- Given the substantial increase in works, Council requires the implementation of a Waste Management Plan for the construction, operation, and end of life phases for the facility.

Socio economic Impact

- Given that the proposed modification would be a substantial increase in works, Council is concerned that an update to the Social Impact Assessment (SIA) has not been adequately considered.
- Council recommends that an updated SIA be included with a section addressing workers accommodation requirements. Critically, this needs to consider the cumulative impact of accommodating a workforce in the context of other major projects occurring in Wagga Wagga and surrounds during 2026 – 2027 (i.e. Humelink, Project Energy Connect, VNI, Inland Rail, Defence infrastructure upgrades, other renewable energy projects).
- As part of an updated SIA, consideration should also now be given to developing a social licence with the community. This may include giving



consideration to a permanent community allocation of energy, that supports community infrastructure or residents.

- Consideration should be given to the community benefit sharing approach in line with the CEC Guidelines or Draft NSW Guidelines.

Cumulative Impact

- Council seeks that the assessment of Modification 4 consider other relevant projects on Boiling Down Road so a comprehensive evaluation of the cumulative impacts is undertaken. This includes Project Energy Connect on the southern side of Boiling Down Road that will see the construction of eight new towers and overhead cables for the new 500kVA link to South Australia. Additionally, there is a proposed Battery Energy Storage Facility on the corner of Boiling Down Road and Redbank Road by Vena Energy.

Additional Considerations

- Council is also currently planning a broad Urban Growth Area, known as the Southern Growth Area, between Holbrook Road and Redbank Road, Gregadoo Road and Rowan Road. This growth area is proposed to provide the city with an additional 4,750 dwellings. As part of this growth area, Council is currently considering a planning proposal for Zone 1 of the Southern Growth Area. The urban growth area will locate residential development adjacent to the subject site proposed for the Gregadoo Solar Farm (see Figure 1).
- Whilst dwellings may not be immediately adjacent to the Solar Farm and BESS, they will have impacts on road capacity, maintenance and local energy connections / requirements and should be considered as part of the Department's assessment.

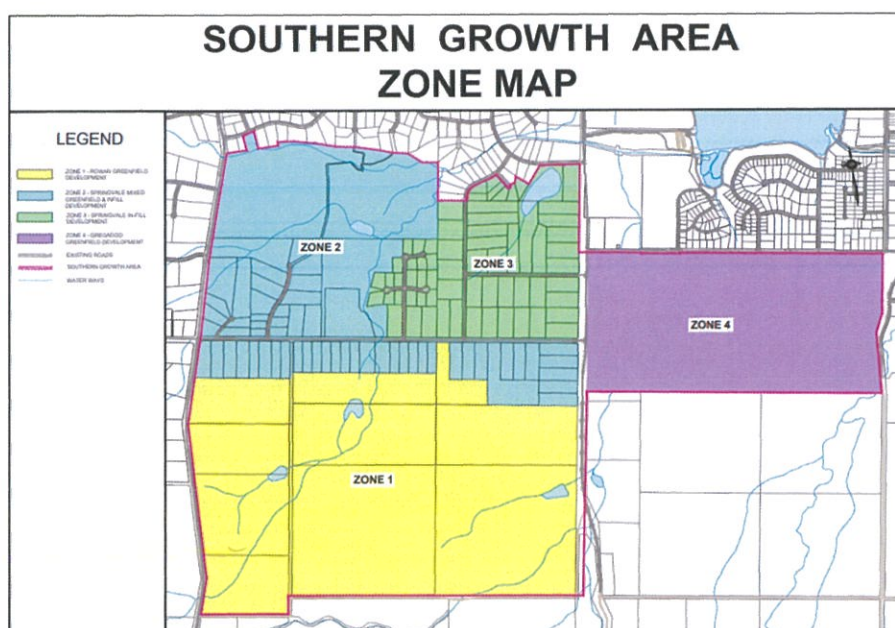


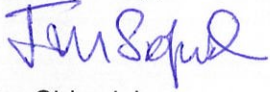
Figure 1: Southern Growth Area (Source SGA Context Paper: Wagga Wagga City Council)

- Council notes that the original Development Consent for the Gregadoo Solar Farm included Schedule 3, Condition 1, which prohibited battery energy storage systems on the subject site. Council seeks to understand why Condition 1 was

imposed on the original Development Consent and what the justification would be to have Schedule 3, Condition 1 removed.

If you have any questions, please do not hesitate to contact Hayden Bousfield, Strategic Town Planner, on 1300 292 442.

Yours faithfully,



John Sidgwick
Director Regional Activation

