



Goulburn Mulwaree Council
Locked Bag 22
Goulburn NSW 2580

Civic Centre
184 - 194 Bourke Street
Goulburn NSW 2580
t (02) 4823 4444
e council@goulburn.nsw.gov.au
www.goulburn.nsw.gov.au

10 December 2024

Samantha Oyston
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Dear Samantha

**Subject: Canyonleigh Battery Energy Storage System (SSD 78247462)
Request for SEARs**

A review of the Scoping Report prepared by ERM, dated 25 November 2024 has been undertaken in relation to the above proposal and Council's comments are as follows:

Council's feedback as summarised in the table on pg.42 of the Scoping Report by ERM still largely stands, however, some further comment has been added in relation to areas of consideration to be addressed:

- There are many other infrastructure and renewable energy projects proposed and being delivered in the region, which is having a cumulative impact on housing, labour availability, the economy and socially in relation to the community's exposure to numerous rounds of consultation.
- Council is particularly concerned in relation to the availability of housing and exacerbated pressure during construction periods of large-scale projects. The social impact assessment (SIA) is to include the cumulative impacts from multiple State significant developments (SSD) proposals in the Goulburn Mulwaree local government area (LGA) and immediate region beyond this. The SIA needs to address impacts on the private rental market for housing.
- Construction is a growing sector – there is a need to provide training programs to meet employment demand. Like housing, the impacts on demand for construction workforce noting other SSDs and the existing low unemployment rate needs to be considered. Consider the low unemployment rate and low rental vacancy when sourcing the workforce for the project.
- The proposed development area is zoned RU2 Rural Landscape and the area to be directly impacted is mapped as Category 2 Regulated Land. The area supports a mix of grassy woodland and open grassland. Based on aerial imagery, cleared areas on the land comprise derived native grassland.

NSW Government SEED SVTM Extant PCT mapping shows the area as containing three PCT:

- PCT 3486 Wollondilly – Shoalhaven slopes grassy open forest
- PCT 3738 Goulburn Lithgow Tableland Hills Grassy Forest
- PCT 3746 Southern Tableland Snow Gum – Candlebark Shrub Forest

A Preliminary Biodiversity Report has been prepared by Environmental Resources Management. The report's authors Georgina Thompson and Jessica Gardener are qualified and experienced ecologists. The report has been reviewed and approved by Lorena Boyle, who is a BAM accredited assessor.

Ground truthing has confirmed the presence of native vegetation on the site and has determined that the PCTs present on the site comprise:

- PCT 3373 Goulburn Tableland Box-Gum Grassy Forest
- PCT 3746 Southern Tableland Snow Gum – Candlebark Shrub Forest
- PCT 4063 Central and Southern Tableland River Oak Forest

Survey work for the PBR was undertaken in January and April, which is not an optimum time of year for assessing native vegetation in the local area. Biodiversity survey work in the Central and Southern Tablelands, especially in grassy woodlands and derived native grasslands, should be undertaken during spring (September/October/November).

The preliminary report notes that further field survey work will be required to prepare a formal BDAR and that a BDAR will be required for later stages of the project.

Based on desktop survey of available databases and maps, and review of the information provided, the findings of the PBR are broadly supported.

- Fire/**bushfire** safety priorities and concerns in relation to both the external threat of bushfire and the potential for batteries to be a bushfire source.
- Visual impacts to near neighbours and other users of nearby roads is to be considered. An initial review of the Canyonleigh BESS Preliminary Visual Impact Assessment prepared by Moir Landscape Architecture Pty Ltd, identified a potentially incorrect vegetation description on page 7 as follows:

3.4 Vegetation

The region typically contains grasslands devoted to grazing, protected areas, and state forests planted with Pinus radiata. Dry sclerophyll forests are evident within Tarlo River National Park near the Project Area. Within the riparian corridor of the Wollondilly River, Sheoak (Casuarina sp.), Red Bloodwood (Corymbia gummifera), and Turpentine (Syncarpia glomulifera) dominate the canopy within this zone.

This statement is potentially incorrect. While River She Oak is present as a component of the local riparian vegetation, Red Bloodwood and Turpentine are not.

Red Bloodwood is rare in the local area, and where it does occur it is usually found on well drained slopes and ridges, typically growing in association with trees such as Silvertop Ash (Eucalyptus sieberi) and Red Stringybark (Eucalyptus macrorhyncha) and not in riparian zones.

Turpentine is not known from the local area. There are no records of this species in the Goulburn Mulwaree LGA. It typically grows in wet sclerophyll forests and the margins of rain forests, mostly in coastal areas. It is highly unlikely that this species is present in or near the Canyonleigh site.

Typical riparian zone trees in the local area would be expected to include Ribbon Gum (*Eucalyptus viminalis*), River Peppermint (*Eucalyptus elata*), Candlebark (*Eucalyptus rubida*) and Cabbage Gum (*Eucalyptus amplifolia*).

- Consider benefit sharing. NSW DPHI has released the new Renewable Energy Framework which was exhibited early this year. One of the key changes to the exhibited guidelines is that battery energy storage systems (BESS) are now included in benefit sharing with guidance (and a rate) on how benefit sharing should be distributed to communities.
- Consider impacts on local access roads. A dilapidation survey is likely to be required to maintain surface standards. The route to the site includes a part of the Gunlake Quarry haulage route and consultation should occur with other haulage operators/users or school bus services to ensure minimised conflict during construction.
- Potential impacts on waterways and water quality- liaise with Water NSW.
- Assessment of Aboriginal cultural heritage impacts and liaison with local Aboriginal community.
- Impacts on agricultural land use and loss of agricultural land.

If you require any further information, please contact me on (02) 4823 4408.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Kate Wooll', with a stylized flourish at the end.

Kate Wooll
Business Manager Strategic Planning