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Pragya Mathema
Resource and Energy Assessments
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Dear Pragya

Subject: **Wattle Creek Solar Farm (SSD 63344215)**
Request for comments on the Environmental Impact Statement

Thank you for the opportunity for Goulburn Mulwaree Council to provide advice on the Environmental Impact Statement (EIS) for the Wattle Creek Battery Energy Storage System.

It is recognised that the proposed development site is located outside of the Goulburn Mulwaree Council (GMC) LGA boundary, however in order to access the site GMC road assets are required to be utilised. Furthermore, the closest workforce and residential settlements are located within GMC. These matters have therefore formed the basis of Councils submission to the EIS.

Council has reviewed the EIS prepared by Umwelt, dated March 2025 and provide the following comments.

Engineering

A Traffic Impact assessment (TIA) has been prepared in accordance with the SEARS. Brayton Road is noted as a B-/double route. The section of road from the Gunlake Quarry entrance to Canyonleigh Road has not been upgraded to the current quarry haul road standard such that a road safety audit and dilapidation report is required for this road section.

It is proposed to upgrade the Brayton Road / Canyonleigh Road / Carrick Road / Bulls Pit Road to provide a dedicated basic right turn (BAR) from Brayton Road into Canyonleigh Road. This work may require relocation of the existing bus bay and shelter on the west side of Brayton Road that serves school bus routes 7 & 9 operated by PBC Goulburn, which has been consulted and has raised no objection subject to establishment of a suitable alternative site if required.

Upgrade work to Canyonleigh Road is proposed but with extent to be determined by consultation with GMC. Field inspection indicates culvert crossings (at Chainages 3.1, 4.3, 6.1, 7.5 & 8.1 kms) and cattle grids (at Chainages 2.9 & 4.3 kms) that are potentially unsuitable for heavy or OSOM vehicles.

The pavement is gravel and is in good condition due to recent grading activity by Council, but its ability to accept the haulage traffic is questioned. The developer will need to undertake a dilapidation report prior to commencement of heavy vehicle haulage and provide regular maintenance during the construction period to ensure the road remains trafficable.

It is considered that the application can be supported subject to conditions similar to those proposed for the EIS for the Gundary Solar Farm project (SSD-48225958), with the inclusion of a condition for road maintenance contributions for the importation of quarry product.

Engineering Recommendations

That the following proposed conditions be included in Council's response to the EIS.

1. A S138 (Roads Act 1993) application with accompanying design plans shall be lodged with Council (the Road Authority) for approval prior to commencement of construction of the proposed Basic Right Turn (BAR) in Brayton Road at Canyonleigh Road (including details of relocation of the existing school bus bay and shelter if required to facilitate the design) and for the proposed Rural Property Access in Canyonleigh Road at the site entry. Unless Council agrees otherwise, this work must comply with the current Austroads Guidelines, Australian Standards and Council's Standards for *Engineering Works, 2013* and be carried out to the satisfaction of Council.

2. Heavy vehicle haulage shall be undertaken via the proposed Route 2 nominated in the EIS (Hume Highway / Red Hill Road / Ambrose Road / Brayton Road / Canyonleigh Road).

   Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over dimensional vehicles on the road network.

3. The Applicant must, in consultation with Council:

   a) undertake an independent road safety audit of the proposed access route from the Hume Highway to the site;
   b) undertake any road improvements identified by the road safety audit prior to commencement of road transport haulage;
   c) undertake an independent dilapidation survey to assess the existing condition of the local roads used as the access route prior to construction, upgrading or decommissioning works; and
   d) repair and/or make good any development related damage to the haul roads identified by the dilapidation surveys during construction, upgrading or decommissioning works in consultation with Council.

   If there is a dispute between the Applicant and Council about the upgrading or repair of the subject roads, then either party may refer the matter to the Planning Secretary for resolution.

4. Prior to commencing any heavy vehicle road haulage, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary.

   This plan must include:

   a) details of the transport route to be used for all development-related traffic;
   b) details of the road upgrade works required by Condition 3 above;
   c) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including:

      - details of the dilapidation surveys required by the Condition 4 above
      - ensuring compliance with the access route described Condition 2 above;
      - monitor the compliance of vehicles using the access route;
      - temporary traffic controls, including detours and signage;
      - scheduling the arrival and departure of heavy vehicles from the site to avoid the PM peak hour where practicable;
      - notifying the local community about development-related traffic impacts;

- procedures for receiving and addressing complaints from the community about development related traffic;
- minimising potential cumulative traffic impacts with other projects in the area;
- minimising potential for conflict with school buses and other road users as far as practicable, including preventing queuing on the public road network;
- minimising dirt tracked onto the public road network from development-related traffic;
- details of an employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service;
- encouraging car-pooling or ride sharing by employees;
- scheduling of haulage vehicle movements to minimise convoy length or platoons;
- responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding;
- responding to any emergency repair or maintenance requirements; and
- a traffic management system for managing heavy vehicles requiring escort;

d) a driver's code of conduct that addresses:

i. driver fatigue;
ii. procedures to ensure that drivers adhere to the designated transport routes and speed limits; and
iii. procedures to ensure that drivers implement safe driving practices;
iv. a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan; and
v. provisions for reporting to TfNSW and Council of vehicles using the access route described in Condition 2 above, every 3 months during construction.

Following the Planning Secretary's approval, the Applicant must implement the Traffic Management Plan.

The Applicant must ensure:

a) the internal roads are constructed as all-weather roads;
b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site;
c) the capacity of the existing roadside drainage network is not reduced;
d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and
e) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the public road network.

Social and Economic Impact

Section 2.6 Cumulative Impacts states 'The Project is located outside of the NSW REZs and as such will have considerably less cumulative impacts associated with it than comparable renewable energy projects within these zones'.

Given there are 24 State Significant Development projects in varying stages of operation and approvals either within our LGA or utilising our infrastructure and services, the cumulative impact on our LGA is substantial.

The Project will likely need to compete with other concurrent major projects within the region, particularly with regard to accommodation, labour and other resources. Of significance, there are eight infrastructure projects recording a medium or high cumulative impact due to their location and potential for timing overlap with the Project.

These projects include the Wattle Creek Solar Farm, Gundary Solar Farm, Merino Solar Farm, HumeLink, the Woodlawn Advanced Energy Recovery Centre, Marulan Quarry, Shoalhaven Hydro Scheme and Marulan Gas Fired Power Station.

The EIS does not include Willavale Park BESS and Canyonleigh BESS. According to the NSW Planning Portal, both of these projects are in the *Prepare EIS* stage. It is possible other projects may overlap with the Project, but this is not certain, including projects in early scoping stages (included in the 24 above) that may also impact the cumulative numbers.

In considering this high number of SSD projects, council have also begun reviewing the cumulative impact of waste and water usage as an important contributor. In isolation, each project's needs appear manageable, however the total impact on waste management centres and water supply within the regions may exceed the current capabilities and require more planning and oversight.

There is significant competition for labour within the construction, engineering and trades industries from large scale employers within the local government area. There are five SSD scale extractive industries, and several large-scale manufacturing industries that employ in excess of 200 people each. There are also applications lodged for an additional three more quarries.

It is also worth noting that whilst there are high numbers of construction businesses and employees in the region, these are needed to fulfil housing targets as detailed in the Goulburn Mulwaree Council Urban & Fringe Housing Strategy, as well as more broadly the targets set by the NSW Government.

One of the Goulburn Mulwaree LGA's largest social challenges at present is housing availability and affordability. A projected construction workforce accommodation need of 200 workers (at the peak of the project) is described.

At this level of accommodation requirements, the Project in isolation is likely to have a limited impact on the EIA Study Area housing and accommodation market. However, given the number of concurrent projects likely to occur in the EIA Study Area during the Projects construction period, there will likely be accommodation shortages in key centres and townships such as Goulburn, Bowral, Mittagong and Moss Vale.

This will place additional strain on the local housing market, which is already subject to housing stress derived from the current cost of living crisis.

Biodiversity Assessment

Four impact zones are addressed in this BDAR:

- Solar farm area (518.34 ha)
- Common ancillary features (also for BESS) (47.67 ha)
- Transmission line option 1 (also for BESS) (6.12 ha)
- Transmission line option 2 (also for BESS) (8.49 ha)

Once again it is acknowledged that the majority of the project footprint falls outside of the GMC LGA.

Council has undertaken significant work in the biodiversity space over the past few years and given that the project is situated upon the border of the GMC and Upper Lachlan LGA's, Council has undertaken a thorough review of the Biodiversity Development Assessment Report (BDAR). This approach is founded upon the basis that numerous flora and fauna communities that may be impacted by the project sit across both LGA's.

Following review of the BDAR using the "Checklist of key inputs and decision points in Biodiversity Development Assessment Reports" (NSW Government publication: *Guidance for local government on undertaking a critical review of a Biodiversity Development Assessment Report*), GMC has confirmed that the BAM has been applied correctly.

BAM C reports and the BDAR have been finalised and certified by a BAM Accredited Assessor.

- Findings of desktop surveys of available databases are supported.
- The BDAR reports that field research for the Wattle Creek BESS project and the Wattle Creek Solar Farm project was conducted by a team of 16 Ecologists over 74 days and 20 nights, between August 2022 and October 2024. This is a very thorough and detailed assessment of the project sites.
- BAM plot data were collected between mid-August and mid-December, which is an appropriate time of year for survey work in the local area.
- Based on the available information, threatened species surveys and assessments have been conducted appropriately.
- The project design and site layout have been reviewed and revised as far as practicably possible to avoid impacts on areas of the land with the highest biodiversity values.
- The size of the development footprint has been reduced from an original design requiring impacts on approximately 1,838 hectares to a revised design that will impact on approximately 580 hectares. A substantial reduction in impact area has resulted from removing a proposed wind farm component from the original project design for the site.
- Design and location of the Solar Farm has been revised to reduce impacts on areas of intact woodland with hollow bearing trees, areas of CEEC Box Gum Grassy Woodland and riparian areas.

Ancillary facilities (including proposed transmission lines) that will be jointly used for the BESS project also require BOS Credits, but as with the main BESS area, the final design has been revised to minimise impacts on biodiversity as far as practicably possible.

Two Transmission Line Options have been evaluated. Option 1 would impact on approximately 6.12 hectares of native vegetation and Option 2 would impact on a larger area, comprising approximately 8.5 hectares. Option 2 would also impact on some PCT 3376 Southern Tableland Grassy Box Woodland (=CEEC Box Gum Grassy Woodland). Based on the available information, Option 1 would have less of an impact on biodiversity values and would be the preferred option for this reason.

Mitigation of residual impacts that cannot be avoided or minimised requires obtaining and retiring BOS Ecosystem and Species Credits, and the BDAR states that the preferred option is via the establishment of a Biodiversity Stewardship Site on the land.

GMC agrees that establishment of a Biodiversity Stewardship Site on the land would be the best option both for the future protection and management of remaining biodiversity values on the land, and for the proponents to meet their BOS credit obligations for this project. Alternative options would be purchasing and retiring BOS credits on the open market, or for payment into the BCF (Biodiversity Conservation Fund).

Community Benefit

Council can advise that discussions have commenced in relation to a negotiated community benefit. At this point in time Council is currently awaiting a revised Letter of Offer from the Applicant. It is requested that the Department require the terms of a Letter of Offer to be accepted by Council prior to any consent being granted.

Yours faithfully

Scot Martin
Director Planning & Environment