

From: Jesse Dick

Sent: Wednesday, 2 November 2022 3:52 PM

To: Elisha Dunn **Subject:** RE: Eathorpe BESS - Request for Input into Secretary's Environment Assessment Requirements

Dear Elisha,

I refer to the Departments e-mail of 20 October 2022 and thank you for providing Council with the opportunity to comment and provide input into the SEARs for the Eathorpe BESS proposal.

Given current workloads and limited time available to be able to fully assess the impacts of this development in detail, only a high level review was possible.

Regardless, following a brief review of the Draft SEARs and Scoping Report it is considered that the majority of matters relevant to this proposal appear to have been identified and included for the proponent to address within the EIS documentation, but Council would also like to provide the following comments for consideration:

Planning Team Comments:

- The Project Area maps in the EIS should encompass all potential impact/disturbance areas. It is noted that the figures included in the Preliminary Biodiversity Assessment appear to show the most accurate potential Project Area (i.e. one that includes potential works to Eathorpe Road/Waterfall Way etc.)
- Section 2.6.1: If subdivision of Lot 842 is required, the dwelling should be assessed as if it were a 'Non-involved dwelling' with the proposal.
- Section 2.6.2 Other Agreements: Council would welcome early engagement on a Voluntary Planning Agreement offer to offset or mitigate the impacts of the Project and to provide the community with public benefits as a result of the development. It is noted that proposed development would normally attract contributions under Council's s7.12 Contributions Plan, calculated at 1% of the estimated cost of construction including GST.
- All land subject to the proposed energy installation should be Zoned SP2 at the conclusion of the project.
- Need to consider the impacts/issues associated with this SSD and the Manoeng Group SSD project proceeding, possibly concurrently. The cumulative impact of the construction and operation impacts should be considered noting that the projects overlap in many key areas.

Project	Developer / Operator	Development Type	Distance to Project Area1	Status	
Renewable Energy Projects					
Armidale Battery Energy Storage System Project	Maoneng Group	Electricity Generation - BESS	150 MW / 300 MWh	340 m	Proposed, SEARs issued

- Proposed access point needs to be included in the EIS. If upgrades to Eathorpe Road and/or the Waterfall Way are required to service the development (including during construction phase), the impacts need to be considered. The Project Area maps should be included to

include all works required as part of the development. TfNSW Concurrence required for any works to a Classified Road.

- Further details on how Council may benefit from the Community Benefit Sharing Program is requested.

5.4 Community Benefit Sharing

To ensure both short and long-term benefits flow through to the community as a result of the establishment and operation of the Eathorpe Battery, we establish a Community Benefit Sharing Program (CBSP).

The CBSP will be designed to deliver benefits to key stakeholders in the community in a way that aims to meet their needs and aspirations. Specifically, our objectives are to:

- Deliver significant and meaningful improvements to the community surrounding Eathorpe Battery;
- Ensure a wide range of different stakeholder groups benefit from Eathorpe Battery;
- Empower the community to shape the design and implementation of the different initiatives; and
- Build support for renewable energy in the Armidale area.

The majority of initiatives will be delivered during the construction and operations phase.

In alignment with Neoen's organisational vision, it is important that the benefit be a true benefit and be tailored to meet each distinct communities' need.

Neoen have a number of mechanisms to enable benefits to be shared in a meaningful and equitable way. Community input was sought into these options (and any other local ideas) at the community information session held on 30 June 2022 and via the community feedback survey.

The final program is likely be a one of the benefit-sharing mechanisms from the following list:

- Community Benefit Fund;
- Lower energy bills – through solar and/or storage subsidies;
- Lower energy bills - through partnership with an energy retailer; and
- Investment to address specific local issue.

Neoen is seeking feedback from the community to share their ideas and feedback about which type of Community Benefit Sharing mechanism they would prefer for the community.

- Chapter 6.2.1.1 Existing Environment: According to Council's mapping service, the nearest Non-associated dwelling appears to be approx. 180m away from the south western corner of Lot 842, not 240m.
- The site is not serviced by reticulated water or sewer. Details on how the development will be sewer and water serviced should be provided, including how amenities during construction/operation phase will be serviced. Further any firefighting requirements during construction /operation phase will also need to be addressed.
- Continuous and ongoing consultation with residents, agencies and key stakeholders is encouraged.

Property Team Comments:

- Appears to be a difference on the site plan on page 27 between paper road and authority road – we consider the roadway running east/west on the western side of Eathorpe Road as a paper road as it hasn't been realised.
- Council wishes to continue discussions with the proponent representatives about potentially realising/constructing the road.

Transport Team Comments:

- First sub dot point of the SEARs should include a statement stating during construction and operation of the development
- Comments in the waste section in the SEARs need to be strengthened to address disposal at end of life. Waste generation at end of life will be critical.
- Consultation with TfNSW should be held early in the process, and ongoing throughout the project.

Regards

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Development Planner

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