



## Office of the General Manager

LP | LAN900158

20 July 2023

Kurtis Wathen  
NSW Department of Planning  
4 Parramatta Square  
12 Darcy St  
PARRAMATTA NSW 2150

Dear Kurtis,

**SUBJECT: YARRABIN (Phoenix) PUMPED HYDRO (SSD-59906734) ADVICE on SEARs**

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to provide input into the Secretary's Environmental Assessment Requirements (SEARs) for the proposed Yarrabin (Phoenix) Pumped Hydro Energy Storage (SSD-59906734). Council has reviewed the requirements and requests the following issues to be specifically addressed in the Environment Impact Assessment.

**Workforce and Accommodation**

It is noted in the Scoping Report that there will be an estimated 500 workers at the peak of construction, with an opportunity to engage a larger workforce to manage multiple work fronts, to allow parallel construction tasks, to reduce the overall construction timeframe. It is noted that a temporary construction workforce accommodation camp is proposed as part of the application, with no details proposed to date.

On-site temporary workforce accommodation is preferred by Council, particularly given the limited availability of suitable short-term accommodation in Mudgee, the closest town to the project.

The workforce accommodation strategy should consider that Council does not support the use of tourist and visitor accommodation for any construction workforce. Due to the current low unemployment rate of 1.7% in the Mid-Western Region, Council requests the SEARs require the Proponent to include information on where the workforce is being sourced. A comprehensive workforce and accommodation plan should be provided as part of the Environmental Impact Statement (EIS).

It is also requested that the Proponent consider the status and timing of all other state-significant developments within the Mid-Western Region and surrounding areas to minimise any adverse cumulative impacts.

**Water**

The SEARs should require the applicant to identify suitable water sources for construction and operation, particularly in drought periods. Water usage estimates should also provide adequate provision for drinking and sanitation purposes during the project and contingencies, such as additional dust suppression requirements during extended dry periods.

### **Waste**

A significant amount of waste is expected to be generated during construction of the project. Council requests the Proponent provide specific details regarding the expected waste to be generated during each phase, including construction waste and workforce sewage, as well as how it will be managed as part of the Environmental Impact Statement (EIS). Furthermore, a waste management plan should be developed in consultation with the Council before consent.

In this regard, Council wishes to advise that none of its waste facilities are appropriate or capable of handling the disposal of landfill waste generated by the project. The Mudgee Waste Facility has limited capacity to accommodate large quantities of landfill material likely to be generated by the project, as the existing Waste Cell is almost exhausted. Any other materials requiring disposal should be discussed with the Council. All of Council's other waste facilities are waste transfer stations accepting residential waste, which is then transported to Mudgee waste facility, they will not be suitable for waste from this project.

### **Environmental Assessment**

Council requests that a suitably qualified person assess the proposed development footprint for koala habitat/breeding/feeding through the use of such tools as koala scat detection dogs, as well as monitoring and recording devices due to recent and nearby koala records. As per SEPP (Koala Habitat Protection) 2021, Part 2 (11), a Koala Assessment Report should be provided to council to assess any potential impacts on koalas or koala habitat.

The scoping report notes that the lack of recorded threatened species within the proposed footprint could be due to a lack of historical survey effort. Council requests efforts to monitor and record any suspected threatened flora and fauna species present in the area to guide future conservation efforts.

Council requests a review of environmental factors be carried out where appropriate.

### **Community Engagement**

Council requests a summary of community engagement, including attendance/participant numbers and issues raised/addressed.

### **Community Participation Once Operational**

Council requests the Proponent provide details on its proposed communications plan and identify mechanisms by which the community can provide feedback during operations. This should also include the Proponent's approach to dealing with complaints or compliance issues.

### **Traffic, Transport and Accessibility**

Council requests the Proponent provide a detailed traffic assessment, investigation into road ownership and required authorisation/approvals is also necessary if the physical road does not sit within the road reserve, or the road belongs to Crown Roads, which has a separate approval process.

The accommodation strategy must be resolved before the traffic assessment is submitted, as worker traffic will impact on the Annual Average Daily Traffic (AADT) and the extent of upgrades required to the roads. The assessment needs to consider the cumulative impacts of AADT on Castlereagh Highway, Hill End Road, Yarrabin Road, Burrendong Dam Road from this project, as well as the Burrendong Windfarm project, which is planned to be undertaken during a similar project time frame.

### **Council requirements regarding transportation**

Council requests details on the size, type and frequency of heavy vehicle movements planned to be taken on the route of Hill End Road (Regional Road) and Yarrabin Road, Burrendong Dam Road and



Endacotts Ln (Local Roads). Assessment of cumulative AADT is required to determine the extent of intersections and necessary upgrading of road geometry.

Recent traffic counts indicate average daily traffic conditions as follows:

- Yarrabin Road 201 vehicles per day
- Burrendong Dam Road 73 vehicles per day

In the EIS Scoping Report, the proponent proposes to direct construction traffic flow, including heavy and light/commercial vehicles along these roads. Burrendong Wind Farm project will use the same transport routes and will be constructed during a similar period. Cumulative AADT of existing conditions, as well as this other project, to be considered in the traffic impact assessment. It would be reasonable to expect >150 vehicle movements per day will be generated, in addition to the existing conditions, as well as that generated by the Burrendong Wind Farm project.

Council does not support the notion of "discrete sections" of road upgrades, as it likely will require a major upgrade to the entire route.

Existing conditions are as follows:

- Yarrabin Road (from Hill End Road to Burrendong Dam Road) has a seal width of 6m.
- Yarrabin Road (from Burrendong Dam Road to Endacotts Ln) unsealed formation width of 6m
- Burrendong Road has a seal width of 6m
- Endacotts unsealed with formation width 4m
- Bridges exist at: Burrendong Dam Road over Meroo creek, Yarrabin Road over Leaning Oak Bridge
- The intersection with Yarrabin Road and Burrendong Dam Road is extremely poor in terms of sight lines and geometry, and acts like a slip road. It will need to be reconstructed to a proper 'T' intersection.

Council requires the proponent to upgrade, or contribute financially, to the necessary upgrade of ALL roads used by the project to sealed pavement, in accordance with Austroads Guide to Road Design Part 3 Geometric Design Table 4.5. Sealed pavement width will be determined by the cumulative AADT of existing traffic, traffic generated from this project, as well as the traffic generated from the Burrendong Wind Farm project (noting a minimum 7.0m seal where more than 15% heavy vehicles).

Structural adequacy of ALL bridges, causeways, culverts, and related infrastructure to be confirmed and upgraded by the proponent if required.

Ecological assessment and REF required for locations of vegetation clearance.

Land acquisitions for road widening (if necessary) are the responsibility of the proponent.

### **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.

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 black ink, appearing to be 'BRAD CAM', with a long horizontal flourish extending to the right.

BRAD CAM  
GENERAL MANAGER