

3/12/25

Department of Planning Housing & Infrastructure

**Re: Request for Advice on EIS**

**Romani Battery Storage System (SDD -67105475)**

Please find below comments in relation to the EIS for the Romani Battery Storage System development ;

**General**

Upon review of the EIS, Edward River Council has identified many gaps in information provided regarding consultation, and are suitably concerned by the errors identified. In noting this it is suggested that further evidence should be provided regarding consultation, in particular with Council and community groups."

**Road Infrastructure and Traffic movements.**

- Council is concerned with the potential for damage and deterioration to the road network during the construction activities. Local roads in the area have been constructed to support low traffic volumes and agricultural plant and equipment only. It is expected that Council will require upgrades to local roads prior to the commencement of works to support the increased volume and type of vehicles using the road during construction.
- It is therefore vital that comprehensive consultation is undertaken with Council prior to the commencement of construction to enable upgrading of the road network to the satisfaction of Council. This will mitigate impacts on roads and ensure that the road network is maintained to a suitable standard throughout construction and operation of the site.
- The TIA/EIS **do not** appear to address the impact of heavy vehicles on cattle grids. The cattle grids are privately owned and would require consultation with the landowners. Cattle grids along Booroorban-Tchelery Road have failed with the increased traffic loads associated with PEC. Assessments are to be undertaken on existing grids and upgrades constructed to ensure they meet the load requirements prior to construction.
- The concept design for the site access is to include drainage measures (eg culverts/headwalls).

**CTMP**

- The EIS references the joint preparation of a CTMP and Road Maintenance strategy however provides limited detail on how this will be formulated and how it will ensure minimal impact on local roads, local traffic and haulage routes. It is important that these documents carefully assess and mitigate any conflicts given the high volume of traffic that will be introduced into these areas.

- It is noted that prior to the commencement of construction, a Traffic Management Plan (TMP) will be prepared in consultation with TfNSW and ERC to make sure road safety and road operations are maintained.

Council's participation in the preparation of the Transport Strategy, along with TfNSW, is vitally important in ensuring that the existing use of the road network is acknowledged and maintained throughout the construction period.

Consideration for the cumulative impact on existing enterprises and agricultural operations be further considered, including but not limited to:

- Existing and proposed road conditions, consideration for wet-weather access, likely conflicts during peak agricultural periods (i.e harvest);
- Localised impacts / traffic diversions for local traffic during construction to manage and minimise conflict between heavy construction traffic and local road users.

### **Emergency Management**

- Bushfire risks associated with the construction and operation of the development are very generally covered in the EIS. Of specific concern is the Bushfire Prone Land areas consisting of large expanses of grassland and the remoteness of these areas. Adequate resources would be required to protect these areas and the properties of adjoining landowners in the event of fire outbreak.

The limited availability of trained fire personnel and response times due to travel distances, could be catastrophic in the event of a fire outbreak. A site-specific plan Emergency Management plan should incorporate details of first line of attack equipment available on site and trained personnel to undertake fire suppression and containment on site.

### **Waste Management Planning**

- Council requires that a comprehensive Waste Management Plan (WMP) be submitted and approved prior to the commencement of construction. This plan must outline the proposed arrangements for managing all waste generated during construction and operation, including from accommodation camps.

### **Accommodation Strategy Requirements**

- Council recognises that short-term and long-term housing availability is a significant challenge within the Edward River LGA. The anticipated influx of contractors, staff, and executives during construction, post-construction, and shift transitions (including FIFO arrangements) will place additional pressure on the region's limited housing stock. Council requires proponents to develop a comprehensive Accommodation Strategy taking into account the cumulative effects of other REZ energy developments in the vicinity of the site. to ensure adequate consideration has been given to workers accommodation options.

### **Decommissioning and Rehabilitation of Site**

- There is limited information provided in the EIS concerning Decommissioning and rehabilitation of the site. Options for renewing and repowering the facility at the end of lifetime or decommissioning the site have been proposed however no information on how these options would be managed has been provided.

Information not limited to but including the following should be provided in a site specific decommissioning plan:

- How the site will be rehabilitated to its pre construction or to a future use agreed upon with Council and landholders.
- Compliance with all relevant environmental legislation, planning conditions, and safety standards.
- Management of Hazardous materials and waste and safe removal and disposal in accordance with EPA guidelines.
- Ongoing monitoring and reporting of rehabilitation progress, including environmental performance indicators and community feedback mechanisms.
- Final sign-off on rehabilitation works from Council and relevant regulatory bodies.
- Acknowledgement that all costs associated with decommissioning and rehabilitation to be borne by the Proponent, with no financial burden placed on Council.

Yours sincerely



Marie Sutton  
Development Services Manager