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Upper Lachlan Shire Council

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File Ref: D2024/12147

17 December 2024

Megan Ramsdale
Planning Office
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Megan

**RE: SWALLOW TAIL BATTERY ENERGY STORAGE SYSTEM (SDD-78039972) –
REQUEST FOR INPUT INTO SEARS**

Thank you for offering Council the opportunity to provide input into the SEARs for the Swallow Tail Battery Storage System. Council apologises for the delay in providing a response. Unfortunately due to limited resources and illness the response time was overlooked.

Following a review of the Scoping Report the following comments are provided for the consideration of the Department and the Applicant for consideration:

General Community Matters

- Upper Lachlan Shire has had approved within its boundaries a significant number of renewable energy projects, whether that be in the form of wind turbines and/or solar generation. Whilst the community is largely supportive of renewable technologies, some concerns have been raised in recent times in regards to the cumulative impact of the significant number of large scale renewable projects approved and/or proposed within the LGA. In this regard, it is recommended that an extensive community consultation process be developed to widely inform the local community of the proposal, together with direct engagement with Council and elected Councillors.
- The application will need to address the potential impact and availability of housing, especially during the construction phase. There is the potential for the workforce associated with the construction phase to place an additional strain on the local housing market. Where an EIS is developed it must consider the cumulative impact that this project may have on housing especially when taking into consideration other State Significant Development within the immediate vicinity.
- The SEARs indicates that there are '*opportunities for contractors and businesses through the creation of construction jobs and operational activities*', however later in the same report advice is provided that the project will only result in 2-3 ongoing FTE. The EIS will need to clarify the number of FTE, the time period for which these FTEs will exist and what the opportunities will include.

- Again the SEARs indicates that '*the project will provide jobs and investment in the Upper Lachlan Shire LGA*'. Further clarification needs to be provided to support these statements.

Rural and Landscape Matters

- Any biosecurity assessment should make recommendations for the management or mitigation of weeds. This should include ongoing weed management within the site.
- Visual impact, including important vista and views of the BESS, is to be fully addressed.

Council Public Road Matters

- The construction of the project involves the delivery of plant, equipment and materials, including the potential movement of heavy vehicles, all of which have the potential to impact on the local and regional road network primarily during construction. The application will need to adequately assess the impact and disturbance on the road network especially during the construction period.
- Council questions the possible transportation and haulage routes being Brayton Road and Hanworth Road and the suitability for heavy vehicle haulage.
- A dilapidation report will be required for all local roads used by heavy vehicle traffic prior to the construction period commencing, with any repairs that are required post-construction conditioned accordingly.
- It is recommended that the Applicant engages with Council's Infrastructure Department as soon as practicable in order to ascertain any relevant condition assessment requirements and the subsequent extent of any required upgrade works.

Environment/Waste

- If toilets are required for the operational period a waste water management plan is required to assess the suitability of the site. Where an OSWWM system is required a section 68 application for the installation and operation of an OSWWM system is required from Council.
- A stormwater management plan must be undertaken to ensure post-development flows leaving the site are at pre-development levels. The system should incorporate sediment and erosion control measures for the construction and operation periods.

General

- Any development should consider the location of the Border to Sydney Gas Line and ensure that any potential impact will be negligible from a risk perspective.
- The SEARs refers to *State Environmental Planning Policy (Biodiversity and Conservation) 2021* and focuses on relevant components referring to flora and fauna. The proposed development site is located within the Sydney Water Catchment and as such consideration should be made to Part 6.5 – Sydney Drinking Water Catchment of the SEPP.
- With reference to future engagement, as the proposed development site is located within the Sydney Water Catchment, consultation should also include the Sydney Catchment Authority.

- Where an application is required for a potential subdivision to enable land ownership all relevant requirements of the *Upper Lachlan Local Environmental Plan 2010* shall be addressed including meeting the minimum lot size requirements.
- The project needs to provide a clear community benefit and as such Council considers a Voluntary Planning Agreement to be the preferred means of delivering this outcome. Negotiations with Upper Lachlan Shire are required to ensure that the off-site benefits of the project are equitably distributed within the Upper Lachlan Shire community.

If you require any further information, please contact me on (02) 4830 1000 during normal office hours.

Yours sincerely



Simon Arkinstall
Director, Environment and Planning