



ALIN 87 011 241 532

# Upper Lachlan Shire Council

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**Our Ref: F11/203**

**15 September 2011**

**Major Projects Assessment  
NSW Department of Planning  
GPO Box 39  
SYDNEY NSW 2001**

**Attention: Toby Philp**

**Dear Mr Philip**

**RE: PUBLIC EXHIBITION OF ENVIRONMENTAL ASSESSMENT FOR DALTON POWER  
PROJECT (MP\_0035)**

Reference is made to your invitation to comment on the public exhibition of the Environmental Assessment for the Dalton Power Project (MP\_0035). In response to the invitation, Upper Lachlan Shire Council would like to submit the following comments:

- **Gas Pipeline (southern portion)**

The EA discusses that the pipeline would be constructed along Walsh's Rd. Unfortunately, the existence of approximately ten mature, protected white box and Blakely's Red Gum trees within the road reserve leave inadequate space for both the pipeline and the proposed widening of the road. If the pipeline was to be constructed underneath the road, extreme disruptions to traffic would occur for duration of the construction work. The road reconstruction work would also become difficult as the pipeline would need to be buried at a significant depth to prevent damage to it by the anticipated heavy traffic. The paddock to the eastern side of the road has ample space for the pipeline, is relatively clear and eminently more suitable for the location of the pipeline. There will also be safety and operational issues related to the maintenance of the road if the pipeline was to be laid at the edge of the road and at a shallower depth.

- **Water Supply**

The Environmental Assessment is generalised in terms of water supply requirements and lacks due consideration of potential sources of supply. The Assessment while describing the water demand as 'small essential demand', gives no further guidance on quantities required. From discussions with the applicant it is understood that up to 38ML per annum will be required for this facility. When placed in context with the Dalton Town Water Supply which uses 10ML per annum the essential demand is not considered small. While the EA also indicates that water can be obtained from a number of sources, it fails to be definitive in quantities from respective sources, and given some of these sources do not appear practicable the overall conclusion is questionable.

The Environmental Assessment identifies 5 potential sources for water supply;

1. Augment Gunning Water Supply
2. Augment Dalton Water Supply
3. Utilise Gunning Sewerage Treatment Plant
4. Tankering to site
5. Groundwater extraction

*Augmentation of the Gunning Supply* - Total annual water consumption at Gunning is in the order of 60ML per annum. The supply lacks sufficient treatment and storage to provide a secure supply during drought and flood events. A demand of 38ML would have a significant impact upon the current water supply infrastructure of Gunning.

A significant increase in water storage, a 12km pipeline and appropriate pumping facilities would be required to enable the applicant to obtain water supply from this system. The applicant must recognise this option has a significant cost that will need to be borne by the applicant and has a lead time to completion. If this option is to be pursued the applicant will need to progress discussions with Council with respect to this option as a matter of urgency.

*Augmentation of the Dalton Water Supply* -The understood demand of the facility is almost four (4) times that of the existing village system. The existing village system lacks capacity to provide for this demand. Existing low yielding bores are not capable of providing this demand. It is considered doubtful that adequate yielding bores to supplement the town supply to meet the applicants water demand can be provided.

*Gunning Sewerage Treatment Plant* - The EA suggests Gunning STP effluent as an option if quality and quantity are sufficient. The annual discharge of effluent from the Gunning STP facility is around 25ML. This quantity is below the understood demand of the facility. Effluent quality is well below that required for potable and process needs identified in the EA. The effluent discharge is also located more than 15km from the proposed site. Given the cost of additional treatment, a pipeline to convey it and a lack of quantity to meet total needs, using Gunning STP effluent is not considered a realistic option.

*Tankering to Site* - Tankering water to site is nominated as the preferred option. The basis of this preference and an analysis of the logistics of achieving this is not provided in the EA. The EA does not consider the traffic impacts, nor from what source is the tankered water to be obtained. Council is unable to fully consider the impact upon its road network without having information with respect to the route and number of tanker loads needed.

*Groundwater Extraction* - Groundwater availability in the area is largely an unknown quantity, however given local experiences the ability to obtain a sufficient groundwater source is considered doubtful. Irrespective of the success or otherwise of groundwater investigations it is impossible to fully assess the impact of the development without further information on quantities of water required and also further investigations with respect to potential groundwater availability.

In order to undertake adequate consideration of the water supply component of this project it is considered that the applicant needs to provide further information and undertake further investigations with regard to detail of the water supply options

- **Wastewater**

The EA identifies that blowdown water will be disposed of in lined evaporation ponds. The EA, however, fails to identify how residual waste from those ponds will be managed, nor details on the expected contaminants contained therein.

- **Noise**

Concerns are raised regarding the potential noise levels during the day and at night if the full potential of the project is realized, eg. 24/7 for an extended period of time. The EA has not explained the potential impacts of this situation.

- **Traffic and Transport**

The EA discusses transport issues by claiming that the existing road network has the capacity to satisfactorily and safely accept the additional traffic generated by the development. Council disputes this statement and argues that narrow pavements with low design speed characteristics and low background traffic volumes are likely to present a number road safety issues unless adequate consideration is given to how the likely users are going to mix with each other safely. There is a need to address road widths over crests and around curves as well as install additional signage to ensure motorists are aware of the changing traffic conditions that they are likely to encounter.

The EA continues on to discuss other road issues in two categories. Comments in these areas are categorised similarly and are as follows:

- i) Over-mass and over-dimension vehicles – These will be infrequent and controlled by RTA, NSW Police and Upper Lachlan Shire Council permits. The routes proposed will be along the ULSC Regional Road network which is an asset that is Council property. Council must be consulted in developing the routes to be used as it is the owner of the assets which are lightly constructed pavements. These pavements are suitable for their present use, but are generally not capable of carrying the additional loads proposed without damage. Council is also concerned that there a number of old culverts along the roads that will need assessment to determine what strengthening works and or widening works are required to enable them to safely carry the proposed loads. The capacity of the rail overbridge in Gunning needs to be assessed, as it may not be able to carry either the over-mass vehicles or the repetitive delivery traffic loadings.
- ii) Routine deliveries of building materials including concrete, steel products, gravel, aggregates and water - Council experience with other similar developments indicates that this category of transport has the potential to create far more damage to the road network than any other activity. Concrete trucks in particular cause significant damage due to their high frequency of deliveries, maximum axle load utilisation and suspension characteristics. The lightly trafficked roads will definitely not cope with the additional loading and significant damage is to be expected to be caused by the deliveries associated with the project. This will be further exacerbated if the construction work continues during wet weather. The developer must enter into an

agreement with Council (including bonding of repair funds) to ensure that the roads are returned to their present condition (or better) post project. There is also a need to establish a mechanism to ensure timely repair of any pavement failures that occur during the construction phase. This is to ensure the safety of all road users.

The assessment and definition of all preparatory and remedial works will be difficult as the developer intends to stage the project into at least two parts. Should these parts be separated by more than several months, the Dalton community will rightly expect that the repairs works will need to be completed at the end of each stage.

- **Urban Road Issues**

The EA fails to address urban safety issues at all. This is of paramount importance as particular attention needs to be paid to the selection of routes within the urban areas of Gunning and Dalton. Both townships have vulnerable facilities such as schools and preschools to deal with as well as lightly constructed pavements to consider. The roads surrounding the northern part of Dalton are also used by the community as walking trails in their pursuit of improved health and fitness. Separation of pedestrians from heavy traffic needs to be considered. Traffic using the unsealed roads in the vicinity of Dalton village will also create a considerable dust nuisance for residents. The community has an expectation that the developer will reconstruct and seal the roads involved to council's specifications.

- **Community Enhancement Program**

The EA fails to recognise the existence of Council's Development Control Plan, in which Council, at the time of exhibition of this project, has endorsed Part 3 Submitting a Development Application – Sections 3.17 Community Enhancement Program and Appendix B – Power Station Planning Agreement of Upper Lachlan Development Control Plan 2010. The EA makes no mention of its corporate responsibility to the immediate area other than a motherhood statement of creating economic benefits both for the state of NSW and AGL. Therefore, a condition requiring the proponent to provide a contribution in accordance with Section 3.17 of the Upper Lachlan Development Control Plan 2010 should be included in the determination if approved.

For any further information or clarification please contact Council's Environment and Planning Section, during office hours.

Yours faithfully



**Tina Dodson**

**Director Environment and Planning**

for

**J K Bell**

**General Manager**

**Upper Lachlan Shire Council**