



13 August 2021
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Department of Planning, Industry and Environment
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Attention: Rose-Anne Hawkeswood
Team Leader Energy, Climate Change and Sustainability

Dear Rose-Anne,

Application Number: SSI-15548591Mod-1
Applicant: East Australia Pipeline Pty Ltd
Description of Proposed Modification: Compressor Station

Thank you for the opportunity to provide a submission in relation to the above mentioned project.

The documentation submitted with the modification application has been reviewed and a number of comments/observations are made below in relation to specific aspects of the proposal.

Socio-Economic Assessment (SEA) Review

The outcomes from the SEA prepared by EMM include:

- *The compressor station locations have been selected partly based on their distance from sensitive receptors, including regional towns and private residences, and local impacts will be limited.*
- *Key benefits include potential economic growth and employment opportunities associated with an increase in job opportunities locally, regionally, and state-wide. Given the comparatively high levels of unemployment within local LGAs, and a regional workforce with resource industry experience, there is potential to employ workers from within the local community.*
- *APA will engage with local accommodation providers to ensure the provision of short-term accommodation for project use will not negatively impact the capacity of local accommodation providers to serve additional guests.*
- *Economic and social benefits within the local and regional area will occur through procurement of appropriate goods and services from local businesses, where available. This will create some benefits during construction, and these may continue, but at a lesser level during operations.*

The SEA report, prepared by EMM, states:

Potential impacts associated with using local temporary accommodation to house the project workforce includes straining the capacity of local accommodation providers. This could have flow-on negative impacts on local tourism and long-term accommodation users by taking up additional capacity. In addition, the presence of a non-resident workforce could have potential negative impacts on the local community as a result of anti-social behaviour in the town.

There is limited short term accommodation supply in Condobolin and in other areas of the Shire and the project will have a cumulative effect on short term accommodation availability when coupled with other projects which are being carried out within the Lachlan Shire or surrounding Local Government Areas (e.g. Inland Rail, Sunrise Mine, mining exploration activities, Mineral Hill Gold Mine, Evolution Gold Mine expansion, Parkes Special Activation Precinct, Parkes By-Pass, etc.).

Tourism is an important industry that would be impacted greatly by this project if a minimum of 58% of Condobolin's short term accommodation options was removed, for a period of at least 12 months. Council also raises doubt from discussions that there was 77% availability for accommodation providers over April and March 2021.

The option of a temporary accommodation camp on-site has been identified in the report and should be explored in more detail given the concerns raised above and given the use of a temporary accommodation camp stated in the report for MW433:

The use of the on-site temporary accommodation camp at MW433 for the construction workforce will limit the potential impacts on local accommodation and housing, however there be limited opportunities for local accommodation providers or services.

The socio economic review suggests that there will be positive benefits for the company in the form of a \$262 million per year annual increase in sales, based on current market values. Further that there will be positive economic impacts on the local and regional areas due to increased supply and availability however for all of this including the impacts of the proposal there are no significant benefits for Lachlan Shire Council such as the establishment of a gas supply line directly to Condobolin.

Noise Impacts

The noise assessment report, prepared by NIA states:

- *Specific noise targets were based on the minimum background noise levels provided in the NPfl, given the remote location of MW433 and MW880.*
- *An assessment of construction noise generated at MW433 and MW880 indicated compliance with the standard construction hours criteria. Construction outside of standard construction hours will also be compliant at each location, with the exception of impact piling at MW880.*
- *Operational noise from MW433 was addressed using a conservative screening noise model for a receiver at 10 km. The model considers noise propagation under worst-case noise-enhancing conditions. Predicted noise levels from the operation of this site is expected to be less than 9dB, which is 26dB below the 35dB LAeq 15min NPfl night-time noise criterion.*

- Operational noise from MW880 were modelled for noise-enhancing meteorological conditions. Predicted noise from the operation of MW880 at the nearest affected assessment location is 31dB LAeq 15min which complies with the 35dB LAeq 15min night-time noise criterion.

- Noise associated with the general operation of the compressor stations was addressed for potential sleep disturbance during the night time period. Predicted noise levels indicate compliance with the sleep disturbance criteria for both MW433 and MW880.

- Noise associated with blowdowns during commissioning and operation will occur rarely, and for a short duration. Noise impacts from these events will be managed by consultation with nearby landholders.

What upfront consultation has been undertaken with affected community members to identify and respond to the potential impacts such as during the blowdown events, including on livestock which are in close proximity?

It is suggested that construction activities are not undertaken at any time outside of the daytime hours period and that detailed consultation is undertaken with surrounding rural properties. This should include regular discussions with them during construction and prior to commissioning to constantly inform of activities. This should ensure that the impacts on residences and those primary producers with livestock are limited.

Traffic/Road Impacts

General Comments

1. The increase in traffic during the construction phase is of significant concern to LSC.
2. It should be noted that Crown Camp Road is a School Bus Route, and road safety on this road should be considered during the construction phase.
3. The Traffic Impact Assessment (TIA) identifies a relatively large increase in light and heavy vehicles. Whilst this rural road currently does not convey a large volume of traffic, these additional traffic volumes will have a negative impact on the road throughout the construction phase.
4. LSC regularly imposes weight restrictions on our unsealed road network for vehicles above 3 tonnes during wet weather. This is to preserve the road asset where possible and avoid unnecessary damage from heavy vehicle freight movements. These weight restrictions will also need to apply to this project. Exemptions can be granted upon request.

Comments on specific locations

5. Lachlan Valley Way upgrade is a project which is currently being undertaken by LSC. This is expected to be completed between January and July 2022. This will remove the deficiencies of this section of Road when measured against the Austroads standards.

6. The Gipps Way – over the last 4 years, LSC has widened and strengthened the majority of The Gipps Way considered in this project. There are no concerns regarding the impact of this project on this road.
7. Intersection of The Gipps Way and Crown Camp Road – it is thought that the current arrangement is suitable and will cater for the additional vehicle movements.
8. Crown Camp Road - Table 5.6 contains errors. The existing seal is not 9m wide, rather it is 3.5m wide for the first 500m, with 3m gravel shoulders. This section of seal is in poor condition as per **Figure 1** below. It is likely that the additional 31 light and heavy vehicles will have a significant effect on the condition of this section of road. LSC request that the proponent reconstruct and seal this section of road to 9 metres prior to the on-site works.



Figure 1 – Crown Camp Road looking east showing seal 3.5m wide for the first 500m, with 3m gravel shoulders (LSC - July 2021).

9. Chainage 500 – 4000 of Crown Camp Road is an 8 metre wide gravel road which is in good condition, as per **Figure 2** below. The additional traffic on this road during construction will require additional maintenance grading. Typically LSC grade this route twice a year. The cost of this additional maintenance should be borne by the proponent during the construction period.



Figure 2 – Crown Camp Road looking west showing 500 – 4000 of Crown Camp Road is 8m wide gravel road (LSC - July 2021)

10. Chainage 4000 – 9500 of Crown Camp Road is an 8 metre wide gravel/natural surface road with limited gravel coverage. The current condition of this section of road is poor, as shown in **Figure 3** below. This is largely due to the above average rainfall received in the area in recent times.

The additional traffic on this road during construction will require additional gravel in order to ensure it can cater for the additional movements. The cost of gravel resheeting this 5km section of road should be borne by the proponent and be completed prior to construction works onsite. Typically LSC grade this route twice a year and additional maintenance grading will be required. The cost of this additional maintenance should be borne by the proponent during the construction period.



Figure 3 – Crown Camp Road showing 4000 – 9500 of Crown Camp Road is 8m wide gravel/natural surface road (LSC - July 2021)

11. Both 90 degree corners within this section of road should be considered more closely in relation to vehicle movements. One of the 90 degree corners is shown in **Figure 4** below.



Figure 4 – One of the two 90 degree corners within 4000 – 9500 of Crown Camp Road (LSC - July 2021)

12. Chainage 9500 – 1100 of Crown Camp Road is an 8metre wide gravel road in good condition, as illustrated in **Figure 5** below. The additional traffic on this road during construction will require additional maintenance grading. Typically LSC grade this route twice a year. The cost of this additional maintenance should be borne by the proponent during the construction period.



Figure 5 – Crown Camp Road showing 9500-1100 of Crown Camp Road is 8m wide gravel surface road (LSC - July 2021)

13. Construction Site entry and exit is currently non-existent. Improvements should be considered for the entry/exit to the site compound. This should include consideration of long vehicle freight access, drainage, site distances, fence/gate setbacks in accordance with **Figure 6** below.

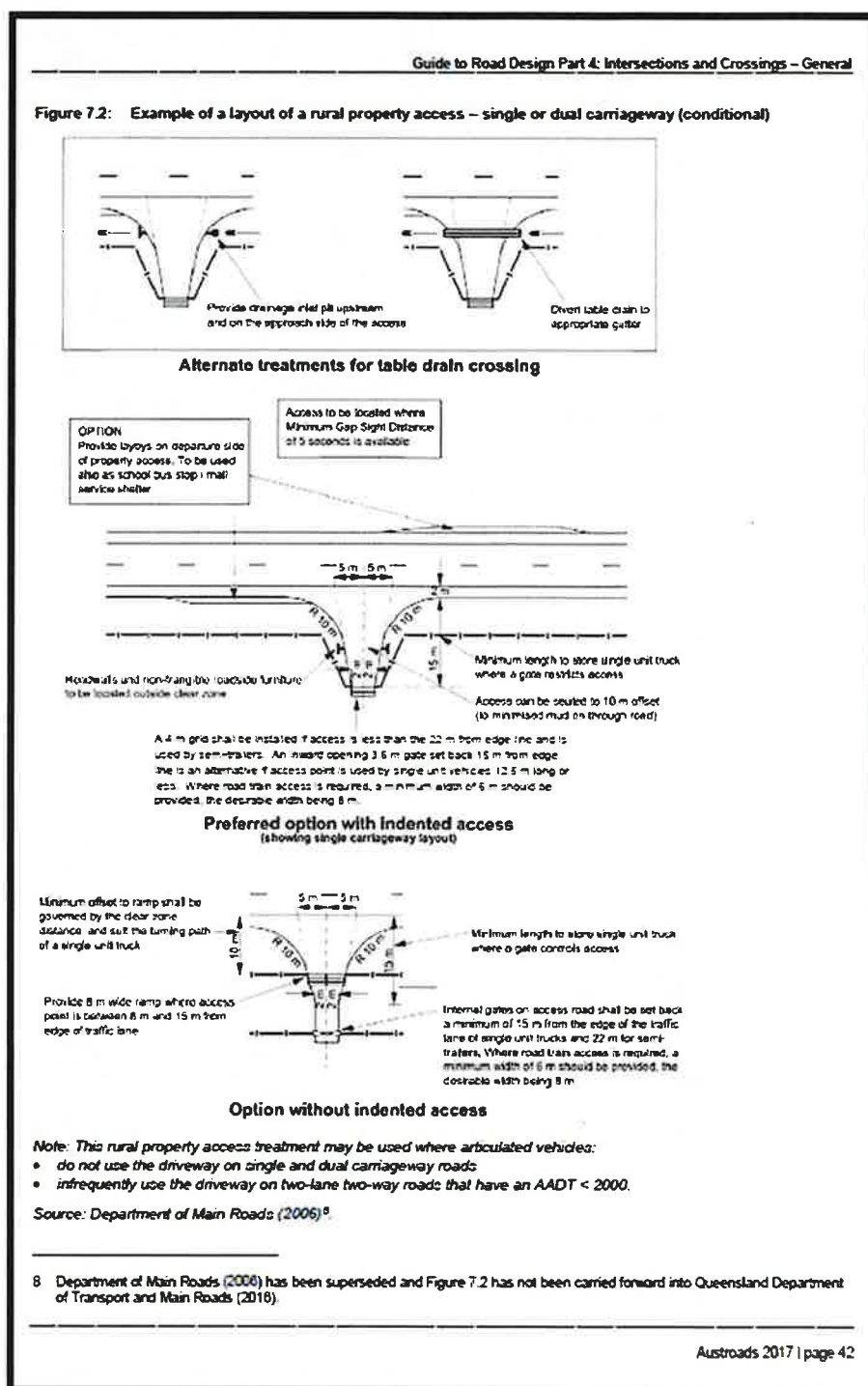
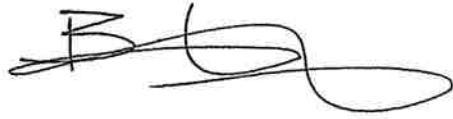


Figure 6 – Showing example of rural property access

If you should have any further enquires with regards to this matter please contact the undersigned on 02 6895 1950 during office hours.

Yours sincerely

A handwritten signature in black ink, appearing to be 'B. Koop', with a stylized, flowing script.

Bryce Koop
Manager Town Planning
Environment, Tourism and Economic Development