

East Coast Grid Expansion

Moomba to Wilton Pipeline Modification 1 – Submissions Report

September 7, 2021



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1. Introduction

1.1. Project overview

APA Group (who own and operate the Moomba to Wilton Pipeline) is proposing an expansion of gas transport capacity of its East Coast Grid that links Queensland to southern markets ahead of projected 2023 supply risks.

The expansion will increase winter peak capacity of the East Coast Grid by 25 per cent through additional compression and associated works on both the South West Queensland Pipeline (SWQP) and Moomba to Wilton Pipeline (MWP) in New South Wales (NSW).

The South West Queensland Pipeline and the Moomba to Wilton Pipeline are the key pathways for delivery of gas from Queensland and the Northern Territory to southern markets.

The expansion will be delivered in a number of stages:

- **Stage 1:** the first stage of expansion works includes the construction of a single site of compression on each of the SWQP and MWP and will increase gas transportation capacity by 12 per cent.
- **Stage 2:** the second stage of expansion works includes an additional site on the SWQP and MWP which will add a further 13 per cent of capacity.
- **Stage 3:** APA is undertaking engineering and design works on a potential third stage (three additional compressor locations on the MWP) of the East Coast Grid to add a further 25 per cent transportation capacity.

The Modification Report (Modification Report 1) was prepared to assess the environmental, social and economic impacts of Stages 1 and 2 of the East Coast Grid Expansion of the MWP.

The proposed East Coast Grid Expansion Project presents an optimal opportunity to maximise gas supply via existing infrastructure with minimal environmental and social impact.

1.2. Assessment and approvals process

The MWP is determined as State Significant Infrastructure (SSI) (SSI-15548591) under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). To augment the MWP with proposed compressor stations, APA must obtain development consent under Section 5.25 of the EP&A Act.

Key legislation relevant to this modification is outlined below.

1.2.1. Environmental Planning and Assessment Act 1979

The NSW EP&A Act and the NSW EP&A Regulation form the statutory framework for land-use planning decisions in NSW. Implementation of the EP&A Act is the responsibility of the Minister for Planning and Public Spaces, state government authorities and local government authorities.

The project is being assessed as an SSI modification under Section 5.25 of the EP&A Act. Section 5.25(3) of the act requires that a request for the Minister's approval of a modification be lodged with the Planning Secretary, and that the Planning Secretary may notify the proponent of environmental assessment requirements.

APA submitted a modification scoping letter to the Department of Planning, Industry and Environment (DPIE) on 5 March 2021, identifying the environmental assessment requirements for the modification report. The assessment requirements were endorsed by DPIE on 18 March 2021. The modification report addressed these requirements, so that the Minister could consider (and grant approval to) the proposed modification under Section 5.25(4) of the EP&A Act.

The Modification Report for the project was placed on public exhibition by DPIE for a period of 14 days from 28 July 2021 to 10 August 2021.

During the exhibition period key stakeholders, local communities and government agencies had the opportunity to review the project information and assessment online via the NSW Major Projects Portal and make a submission to DPIE for consideration in its assessment of the application.

1.2.2. Pipelines Act 1967

A licence to construct, operate and maintain a pipeline is required under the *Pipelines Act 1967* (NSW). Pipeline Licence No. 16 was granted for the Moomba to Wilton Pipeline by the Minister of Energy on 28 May 1997.

A number of variations to Pipeline Licence No. 16 have since been granted, to allow for construction and operation of laterals. A further amendment to Pipeline Licence No. 16 will be undertaken for the operation of the proposed modification following determination of the modification.

1.2.3. Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)

The Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) provides the legal basis to protect and manage internationally and nationally important flora, fauna, ecological communities, heritage places and water resources which are deemed to be matters of national environmental significance (MNES).

Under the EPBC Act, actions that will, or are likely to, have a significant impact on a MNES are deemed to be controlled actions and can only proceed with the approval of the Commonwealth Minister for the Environment. An action that may potentially affect a MNES has to be referred to the Commonwealth Minister for determination as to whether it is a controlled action. If deemed a controlled action, the modification is assessed under the EPBC Act, and a decision made as to whether or not to grant approval.

Of the nine MNES that are regulated by the EPBC Act, the following have the potential to be associated with the modification, and the modification has evaluated whether these MNES are applicable:

- Wetlands of international importance; and
- Nationally threatened flora and fauna species.

The modification will be referred to the Commonwealth Minister for the Environment and is expected to be determined not a controlled action.

1.3. Purpose of the report

During public exhibition of the modification report, six submissions were received by DPIE from agencies and local Council. DPIE did not receive any submissions from the community. Submissions were provided to APA for a response to submissions to be prepared which addresses all issues that had been identified.

This Submissions Report provides a response to all submissions received by DPIE during the public exhibition of the project.

2. Analysis of submissions

2.1. Submissions received

During the public exhibition of the modification report, submissions were invited from all interested parties including key stakeholders, the local community and agencies. DPIE managed the receipt of all submissions.

A total of six submissions were received by DPIE and are available to view on the Departments website: <https://www.planningportal.nsw.gov.au/major-projects/project/41546>.

2.2. NSW Government agency and local Council submissions

A total of six submissions were received from agencies and Council as per below:

- Transport for NSW
- NSW Environment Protection Agency
- Biodiversity, Conservation and Science Directorate
- Heritage NSW
- Department of Planning, Industry and Environment: Water
- Lachlan Shire Council

3. Submissions and responses

The below sections summarise submissions received from NSW agencies as well as the local Council. The complete submissions are available on the Departments website:

<https://www.planningportal.nsw.gov.au/major-projects/project/41546>.

3.1. Transport for NSW

Submission – Management of traffic impacts

Transport for NSW (TfNSW) stated no objection to the submitted application. TfNSW requested the consent authority to consider the below conditions.

“The summary of commitments as detailed in Part 6 of the Traffic Impact Assessment with reference Report No. J200919 RP#6 Version v3 Final, prepared by EMM dated 5 July 2021 shall be implemented during the construction and operation of the compressor stations identified as MW880 and MW433”.

Response

APA confirms commitment to mitigation measures presented in the Modification Report 1 including the Traffic Impact Assessment. These commitments include the below.

Stage	Commitment ID	Commitment
Construction	TT-01	A Traffic Management Plan (TMP) will be prepared for the project, and will incorporate all traffic related requirements from the CEMP.
Construction	TT-02	Transport routes will be clearly marked or communicated, and speed limits enforced.
Construction	TT-03	After arrival at the project site all vehicles, plant and equipment will remain within the construction footprint and on approved roads and tracks.
Construction Operation	TT-04	Any oversized or over weight loads will be transported in accordance with the requirements of the relevant road authority.

3.2. NSW Environment Protection Authority

Submission – No comment

The NSW Environment Protection Authority (EPA) has no comments to provide on the project and no follow-up consultation is required. The EPA notes that Lachlan and Central Darling Shire local

Council should be consulted as the appropriate regulatory authority for the *Protection of the Environment Operations Act 1997*.

Response

APA has undergone consultation with both the relevant councils and will continue to engage throughout the project.

3.3. Biodiversity, Conservation and Science Directorate

Submission – Biodiversity Credit Report

The Biodiversity, Conservation and Science Directorate (BCS) note that Appendix E of the Biodiversity Development Assessment Report (BDAR) contains a Biodiversity Assessment Method (BAM) credit summary report generated from the BAM calculator (BAM-C). A credit summary report does not contain the detail necessary to determine the credit trading options available for the project.

BCS recommends that the assessor should generate and attach a like-for-like Biodiversity Credit Report to allow all relevant parties to trace like-for-like credit trading options available to satisfy the credit obligation for the project.

Response

Please refer to Appendix A1 and A2 of this Submissions Report for the BAM Biodiversity Credit Report (Like for Like) for both MW880 and MW433 respectively.

Submission – NSW National Parks Consultation

In addition to the above, BCS notes that the proponent should consult with NSW National Parks and Wildlife Service (NPWS) regarding the project's potential indirect impact on Paroo National Park.

BCS acknowledges that the discharge of wastewater has been addressed in the project's impact mitigation and minimisation strategy. However, it is unclear to BCS if NPWS has been consulted regarding this potential impact to Paroo National Park and mitigation strategies and protocols proposed. BCS recommends that the proponent contacts the NPWS regional office which manages Paroo National Park to discuss:

- The types of approvals that may be required;
- The proposed activity and its potential impact;
- Information and communication requirements;
- Legal permissibility; and
- NPWS policies relevant to the activity.

It is the responsibility of the proponent to ensure all necessary approvals relating to the development in NPWS estate are identified and obtained prior to the activity proceeding.

Response

APA have consulted with NPWS regarding the proposed development four times, during June, July and August 2021, with the most recent discussions occurring following receipt of this submission. Outcomes of the discussions were that no concerns were raised with the project as it was taking place on APA owned land excised from the Paroo National Park, and that NPWS are satisfied that potential offsite impacts were assessed appropriately and found to be low or negligible.

Section 8.1.2.iv of the Biodiversity Development Assessment Report (BDAR) (Appendix E of the Modification Report) states that there is potential for the spray irrigation of wastewater to result in indirect impacts to water quality and quantity at MW433. The wastewater treatment system will release an average of 5.1kL/day of wastewater to a 9,000m² irrigation field by spray irrigation with the intention of evaporation. This will result in discharge of approximately 0.56L/m²/day. The mean average evaporation rate at MW433 is approximately 2,500mm/year or 0.68L/m²/day, therefore the evaporation rate will be greater than the wastewater discharge rate, and there is not expected to be any offsite movement of wastewater.

APA will seek approval for the wastewater treatment and irrigation system through the lodgement of a Section 68 approval application with the Central Darling Shire Council. Initial and follow-up discussions have been had with Council who have confirmed this approach is the correct approval pathway.

Further, the project design and mitigation measures have been specifically designed to prevent offsite movement of water at MW433. Mitigation measure WS-01 commits to the preparation of a soil and water management plan (SWMP), underpinned by primary erosion and sediment control plans (PESCPs) for all discrete disturbance areas, including the wastewater irrigation field. Surface water and runoff management to be considered in the final engineering design (including the wastewater irrigation field) will be detailed in the SWMP and PESCPs. In addition, WS-10 commits that: all reasonable and practicable measures needed to protect downstream waters and adjacent properties from the adverse effects of sediment and turbid water discharge will be implemented.

As such, indirect impacts to the Paroo Darling National Park and the Paroo River Wetlands are expected to be very low to negligible.

3.4. Heritage NSW

Submission – Aboriginal consultation

Heritage NSW (HNSW) accept the ACH assessment undertaken to determine threats to ACH and is also satisfied with the Aboriginal consultation undertaken and, accept the stage 1 notification undertaken by the proponent as previously advised (Appendix A: HNSW advice, DOC21/196544).

HNSW recognise that the proposed management recommendations to be put in place at MW433 have adequate measures that will minimise and avoid harm to Aboriginal objects.

HNSW is satisfied that the proposed works at MW880 will not harm any cultural material and recognise that the proposed unexpected finds protocol will be applied as a precaution.

HNSW understands from the tabled communication log that the Registered Aboriginal Parties (RAPs) support the proposed management measures which involve, relocating the Aboriginal objects (stone artefacts) to areas outside of the disturbance footprint at MW433. HNSW notes correspondence from a registered party, Mr Gerald Quayle, which recommends that the objects be salvaged and stored at Peery Lake on the nearby Paroo Darling National Park. HNSW asks that the proponent addresses the suggestion put forward by the Mr Quayle. Mr Quayle also recommends that the siting of the proposed development at MW433 is in an area that may impact his cultural tourist ventures.

HNSW has not sighted, in the ACH documentation, a response to Mr Quayle's recommendations and request therefore that the proponent address these matters and inform DPIE and HNSW of the outcomes.

Further, HNSW note that the records of the meetings with the RAPs to discuss the project and management strategies are omitted from the report. Should the records include matters on the management of ACH and the draft ACH assessment report, additional to that described in the consultation log and consultation summaries, then the records must be provided to DPIE and HNSW for consideration.

Response

APA notes that two minor issues were identified by HNSW in relation to Aboriginal consultation during the development of the ACHA.

In relation to comments made by Mr Gerald Quayle around the curation of any recovered cultural material and potential impacts from the activity on his cultural tour business, APA notes that this is addressed through the provision of the final ACHA to Mr Quayle (and other RAPs) for review. Further, EMM (APA's Aboriginal Cultural Heritage consultant responsible for the assessment) have emailed Mr Quayle directing him to the sections where his comments have been addressed.

EMM have advised Mr Quayle that the development of the Aboriginal Cultural Heritage Management Plan (ACHMP) will commence shortly which will allow these discussions to continue and be further resolved. The provision of the final ACHA to Mr Quayle (and all other RAPs) was undertaken on the 18 August 2021, and a revised consultation log can be provided if required.

With regards to HNSW's comment relating to potential omission of meeting records from the report, APA believe this may be a misunderstanding of the finalisation process of the ACHA. While the initial proposal to Heritage NSW was to undertake two Aboriginal focus group meetings (one prior to field investigations and one following) to ensure suitable consultation for the ACHA, only one was permissible due to COVID restrictions.

Appendix C.4 (of Appendix F of Modification Report 1) includes the minutes of the meeting/s that were held prior to the field investigations, which was undertaken in late-April 2021. The post-

fieldwork meeting was organised and confirmed for late-June 2021, however, a COVID outbreak resulted in these meetings having to be cancelled. The consultation log provided in Appendix C.1 provides a summary of the various communications distributed to both undertake and then cancel the meeting, but the actual documents, which do not include anything of substance were not included in the ACHA. Instead, to allow finalisation of the ACHA, APA provided financial assistance to the RAPs to undertake a formal review of the ACHA, as well as offered online meetings for those that wanted to discuss the report. A range of telephone calls, during the abbreviated comment period, was also undertaken, and any discussions outlined in the consultation log in Appendix C.1.

Two sets of written comments received were provided in Appendix C.5 of the report and summarised in Section 2.2.2 ACHA (Appendix F of Modification Report 1). One of these sets of comments was received from Mr Gerald Quayle (as outlined above). Only a single online meeting was undertaken with Bundyi Aboriginal Cultural Knowledge, in which discussions were mainly focussed on removing a handful of perceived sensitive material from the ACHA – this was undertaken. The full minutes of the discussion are provided in Section 2.2.2 of the ACHA (Appendix F of Modification Report 1).

All consultation material with the RAPs – with the exception of relatively trivial logistical discussions over a failed meeting in late-June – are presented in Appendices C.1 to C.4 inclusive.

3.5. Department of Planning, Industry and Environment: Water

Submission – Water availability

The Department of Planning, Industry and Environment: Water (DPIE Water) state that insufficient information has been provided to confirm the water demands can be sourced for the project by the options proposed and this presents a risk for the project. DPIE Water further note that APA has not provided confirmation of water suppliers to provide the necessary volumes or provided an assessment of water availability or impacts of accessing groundwater to address water regulatory requirements.

DPIE Water recommends APA provide further information to confirm the ability of water suppliers to meet the demands of the project. Further, if groundwater is to be utilised from a new bore, or an existing bore that does not have the relevant authorisations, an assessment should be completed of water availability and an impact assessment against DPIE Water groundwater dealing / new impact assessment criteria and relevant Water Sharing Plan rules. APA should demonstrate the ability to acquire water entitlement where necessary.

Response

Water availability and supply has been investigated and the details for each of the two sites is provided below.

MW880:

APA is still considering options for water supply at MW880. The primary option, as assessed in the Modification Report, will be to enter into a commercial agreement with Lachlan Shire Council to purchase water from a standpipe south of Condobolin and cart water to site. Traffic movements associated with this have been assessed as a part of the Modification Report.

An alternative option would be to purchase water from a local water scheme where a similar commercial agreement would be required. APA may need a Water Access Licence to link to the water scheme Works Approval and this would be sought prior to works commencing.

MW433:

APA will seek approval for groundwater access at MW433 through an additional modification to the Moomba to Wilton Pipeline SSI. APA understands that under the modification process, DPIE Planning, DPIE Water and NRAR will assess the impacts of groundwater abstraction at MW433. APA will still be required to secure shares on the water market.

Dependent on approval of this additional modification, APA will then be able to secure a miscellaneous works approval to install and use the water supply works (groundwater bore) as permitted in the SSI approval.

As a part of the modification APA propose to develop an analytical groundwater model to simulate the requirements of the 20ML over the construction timeframe, develop and groundwater impact assessment report and develop and groundwater management plan.

APA held discussions with DPIE Planning, DPIE Water and NRAR on 01 September 2021 to discuss this approach. DPIE Planning confirmed this as the correct pathway to seek approval for water supply at MW433.

APA understand that approval of Modification Report 1 may be conditional, with works only permitted to commence at MW433 once suitable approvals are in place.

Submission – Upslope Runoff and Downstream Impacts

DPIE Water note that the location of the compressor station at MW880 is within the flow path of water from a third order watercourse which indicates the need to manage upslope runoff around the site and to mitigate any downstream impacts. This needs to be addressed within a Soil and Water Management Plan for the site.

DPIE Water recommend APA prepare a Soil and Water Management Plan to address stormwater management and sediment and erosion control. The plan should address the requirements of the guideline Managing Urban Stormwater: Soils and Construction (Landcom 2004) and the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018).

Response

Noted. APA have committed to the development of a soil and water management plan (SWMP) for the project which will be underpinned by primary erosion and sediment control plans (PESCPs) for all discrete disturbance areas and updated in accordance with Landcom (2004) and certified by a CPESC.

Surface water and runoff management will be considered in the final engineering design and will be detailed in the SWMP and the PESCPs.

3.6. Lachlan Shire Council

Submission – Workforce accommodation

Lachlan Shire Council (LSC) note that 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 considered in conjunction with other projects within Lachlan Shire or surrounding Local Government Areas (LGAs) (examples include, Inland Rail, Sunrise Mine, Mineral Hill Gold Mine, Evolution Gold Mine expansion, Parkes Special Activation Precinct, Parkes By-pass, etc.).

Further, LSC state that tourism is key for the region and would be affected really by the project if a minimum of 58% of Condobolin's short term accommodation was utilised for a period of at least 12 months. Council recommends that the option of temporary accommodation on site should be explored in more detail.

Response

APA takes note of Council's recommendation and confirms that the preferred option for housing the workforce during the construction phase of the project will be temporary accommodation on site (as per MW433). There may be times when small crews may require accommodation within Condobolin but this would be limited to the available accommodation at the time. These requirements will be for relatively short durations.

APA note that housing the bulk of the construction workforce away from populated centres will minimise interaction with the local community and therefore decrease any potential COVID 19 related risks for both the local community as well as the construction workforce.

Submission – Economic impacts

LSC notes that the socio-economic assessment suggests positive benefits for the company in the form of a \$262 million per year 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 this including the impacts of the proposal there are no significant benefits to Lachlan Shire Council such as the establishment of a gas supply line directly to Condobolin.

Response

APA estimates that approximately \$1.5 million (of the whole of project spend) will be spent on labour, goods and services from the local region during construction and a further \$250,000 per year during operations.

There will likely be opportunities for the project to acquire goods and services directly from the regional area during the construction phase, including:

- Goods and services for construction camps, such as food and drink supply, waste management and cleaning services;
- Fuel;
- Vehicle and equipment servicing;
- Consumables; and
- Additional support in the form of vegetation management and rehabilitation, water cartage and traffic management, where required.

The scope of this modification report involves a modification to the existing Moomba to Wilton Pipeline SSI project. The Moomba to Wilton Pipeline (MWP) is a high pressure transmission pipeline transporting gas approximately 1,300km from Moomba in South Australia to Wilton in NSW. The scope of the existing SSI and modification does not involve domestic or residential gas supply.

Supply of gas to customers is regulated through the *Gas Supply Act 1996* and is undertaken through a network of smaller gas distribution pipelines from points along the transmission pipeline.

Details around acquiring gas transmission services for this pipeline can be found on the APA Group website at: <https://www.apa.com.au/our-services/gas-transmission/east-coast-grid/moomba-sydney-pipeline/>.

Submission – Noise

LSC requests details on 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.

Further, LSC suggests that construction activities are not undertaken at any time outside of the daytime hour's 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.

Response

APA have identified seven residences (sensitive receptors) within 5km of the MW880 site. APA have engaged with or attempted to engage with all potentially affected residences.

The two nearest receptors at MW880 have been consulted with throughout the process and have not raised any issues regarding project activities.

The majority of construction activities will take place between 7:00am and 6:00pm, seven days per week. During the commissioning phase, the majority of activities will also take place between 7:00am and 6:00pm, seven days per week, however, for the final two weeks, commissioning activities will be 24 hours per day. This is to ensure the system is run for an extended period of time (> 24 hours) to ensure it operates as it was designed.

APA commits to the following measures to assist in the management of any impacts associated with noise during the project.

Stage	Commitment ID	Commitment
Construction Operation	GE-04	A complaints management system will be put in place that documents: <ul style="list-style-type: none"> - Name of persons receiving the complaint; - Name of person making the complaint; - Date and time of complaint; - Nature of the complaint; - Actions taken to rectify; - Actions to minimise risk of reoccurrence; and - Name of person(s) responsible for undertaking the required solutions
Construction Operation	GE-06	Nearby landholders will be provided a dedicated point of contact for the duration of the project
Construction	NV-01	Standard daytime construction hours of 7:00am to 6:00pm daily will be applied, excluding travel to and from site, and extenuating circumstances beyond the control of the project. Any activities which require extension beyond standard construction hours will be discussed with relevant affected landholders
Construction	NV-02	Impact piling at MW880 will not be conducted outside of Interim Construction Noise Guideline standard construction hours (Sundays, public holidays and Saturday between 1:00pm and 6:00pm) unless agreed with potentially impacted landholders
Operation	NV-03	Turbine intakes and exhausts will be fitted with silencers consistent with those assessed in Table 4.1 of the Noise Impact Assessment
Construction Operation	NV-04	Relevant affected landholders will be notified of any blowdown events scheduled to take place and informed of the potential noise impacts, including timing and duration

Traffic / road impacts

This submission is broken into sections to separate “general” comments and those that are location specific.

Submission – General comments

LSC notes that the Traffic Impact Assessment (TIA) identified a relatively large increase in light and heavy vehicles and that this increase is of concern to Council as these traffic volumes may have negative impacts on identified roads during construction.

LSC notes that Crown Camp Road operates as a school bus route and road safety should be considered during construction.

Further, LSC states that weight restrictions (vehicles above 3 tonnes) are often imposed on unsealed roads during wet weather and that exemptions may be granted upon request.

Response

APA held a meeting with LSC on 01 September 2021 to discuss the potential use of a Council managed quarry site as well as the issues raised in the LSC submission.

As a part of the Traffic Impact Assessment (TIA) for the Modification Report (Mod 1), APA assessed a worst-case scenario (31 peak vehicle trips per day) with regards to traffic generation. After further assessment, further refining of the project schedule and a better understanding of timing of certain construction activities, APA understands daily traffic movements for the project are likely to be reduced as defined below:

Initial three months (site and camp establishment): peak vehicle trips (LV and HV) will be approximately 22 per day during a period of approximately 1 week, while average vehicle trips over the initial three months will be approximately nine per day;

Main construction next six months: peak vehicle trips of approximately 17 per day coinciding with the mobilisation of equipment and an average over the six months of 5 vehicle trips per day; and

Final three months (commissioning / camp removal): peak vehicle trips during this period will be approximately 21 per day mainly concentrated over a single week of building removal, while average vehicle trips will be approximately 10 per day.

As previously described, APA will look to house the construction workforce in temporary accommodation on site which will reduce the number of vehicles using Crown Camp Road during construction.

APA will commission the development of a Traffic Management Plan prior to the commencement of construction activities. APA will ensure that safety concerns around the use of Crown Camp Road are included within the Traffic Management Plan and that these measures are implemented through

the construction of the project. The Traffic Management Plan will ensure that major deliveries and heavy vehicle movements are scheduled outside of school bus times.

APA will seek, through Council, any exemptions required for weight restrictions on unsealed roads during wet weather.

Submission – Specific locations

Issue – Lachlan Valley Way

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.

Response

Noted.

Issue – The Gipps Way

LSC notes that Council have widened and strengthened the majority of the Gipps Way over the last four years and they have no concerns regarding potential impacts from the project on this Road.

Council also notes that the current arrangements of the intersection of The Gipps Way and Crown Camp Road is suitable and will cater for the additional vehicle movements.

Response

Noted.

Issue – Crown Camp Road

LSC have identified a number of locations / sections of Crown Camp Road (as presented in Council's submission) that may require upgrade and / or maintenance grading during the construction phase of the project. LSC note that maintenance grading is typically undertaken twice a year and additional maintenance grading will be required. The cost of this additional maintenance grading should be borne by the proponent during the construction period.

Response

Crown Camp Road

APA have discussed potential road impacts of Crown Camp Road in a meeting with Council on 01 September 2021.

APA propose the following for Crown Camp Road:

- Dilapidation survey to be conducted prior to the commencement of construction on site.
- Chainage 0 - 500
 - It was not possible to visually inspect each section of road in the TIA, and APA acknowledges the error in Table 5.6 of the TIA. As per the response to LSC's general traffic comments, the TIA assessed a worst-case scenario which has reduced significantly as project details and scheduling has been confirmed. Therefore, a full reconstruction and upgrade of the sealed surface to a 9m width is not warranted. APA acknowledges that some impacts may still occur, and is willing to discuss the option of minor repairs to the sealed section to reduce potential further degradation of the road surface.
- Chainage 500-4000 and 9500 - 1100
 - APA is willing to agree with Council a regime for the conducting of additional maintenance grading of this section of road as a result of additional project-related construction traffic. APA is willing to discuss details of the financial contribution for this maintenance as well as the timing of any payments with Council.
- Chainage 4000 – 9500
 - APA is willing to agree with Council a regime for the conducting of additional maintenance grading of this section of road as a result of additional project-related construction traffic. APA is also willing to discuss financial contribution to the gravel resheeting of this section of road as well as the timing of works and any payments with Council.
- 90 degree bends
 - APA notes the 90 degree bends and will ensure the Traffic Management Plan for construction specifically address these locations, including reducing speed at these locations during construction, and temporary traffic control measures when oversize vehicles use this section of road. Given the small increase in operation traffic and the management of construction through the TMP, APA does not propose that an upgrade of these corners is warranted.

Issue – Site entry / exit

LSC states that currently entry and exit points for the site are non-existent. Further, improvements should be considered for the entry / exit to the site compound and take into consideration access for long vehicle freight, drainage, site distances and fence / gate setbacks.

Response

APA proposes to utilise the access to the existing scraper station located on Lot 1 DP580284. This access is within the existing APA easement for the Moomba to Wilton Pipeline.

Additional works are proposed to this turn and could include the addition of wider gates and construction of a culvert to allow for adequate drainage. APA will obtain a permit in accordance with Section 138 of the Roads Act. Any proposed works would be discussed with LSC prior to commencement.

4. Conclusions and next steps

This Submissions Report has been prepared to present a response to all issues raised during the public exhibition of the Modification Report for the project.

The Department of Planning, Industry and Environment (DPIE) will review and assess the Modification Report, all submissions received and this Submissions Report in accordance with Government legislation, policies and guidelines and prepare an Assessment Report.

Following completion of the Assessment Report, this will be provided to the Minister for Planning (or the relevant delegate) for evaluation.

Appendix A

A.1 MW880 BAM Biodiversity Credit Report (Like for Like)

BAM Biodiversity Credit Report (Like for like)

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00026165/BAAS17037/21/00026176	APA East Coast Grid Expansion Mod 1 - MW880	10/06/2021
Assessor Name	Assessor Number	BAM Data version *
Nathan Garvey	BAAS17037	45
Proponent Names	Report Created	BAM Case Status
	12/08/2021	Finalised
Assessment Revision	Assessment Type	Date Finalised
0	Major Projects	15/07/2021

* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.

Potential Serious and Irreversible Impacts

Name of threatened ecological community	Listing status	Name of Plant Community Type/ID
Nil		
Species		
Nil		

Additional Information for Approval

PCTs With Customized Benchmarks

BAM Biodiversity Credit Report (Like for like)

PCT

No Changes

Predicted Threatened Species Not On Site

Name

Calyptrorhynchus lathami / Glossy Black-Cockatoo

Melanodryas cucullata cucullata / Hooded Robin (south-eastern form)

Phascolarctos cinereus / Koala

Pomatostomus temporalis temporalis / Grey-crowned Babbler (eastern subspecies)

Chthonicola sagittata / Speckled Warbler

Haliaeetus leucogaster / White-bellied Sea-Eagle

Ecosystem Credit Summary (Number and class of biodiversity credits to be retired)

Name of Plant Community Type/ID	Name of threatened ecological community	Area of impact	HBT Cr	No HBT Cr	Total credits to be retired
72-White Cypress Pine - Poplar Box woodland on footslopes and peneplains mainly in the Cobar Peneplain Bioregion	Not a TEC	1.2	0	0	0

BAM Biodiversity Credit Report (Like for like)

72-White Cypress Pine - Poplar Box woodland on footslopes and peneplains mainly in the Cobar Peneplain Bioregion	Like-for-like credit retirement options					
	Class	Trading group	Zone	HBT	Credits	IBRA region
	Western Peneplain Woodlands This includes PCT's: 72, 98, 103, 105, 108, 109, 134, 135, 145, 245, 246	Western Peneplain Woodlands <50%	72_DNG	No	0	Lower Slopes, Bogan-Macquarie, Inland Slopes, Lachlan Plains, Murray Fans, Murrumbidgee and Nymagee. or Any IBRA subregion that is within 100 kilometers of the outer edge of the impacted site.

Species Credit Summary

Species	Vegetation Zone/s	Area / Count	Credits
Austrostipa metatoris / A spear-grass	72_DNG	1.2	5.00
Diuris tricolor / Pine Donkey Orchid	72_DNG	1.2	4.00
Polytelis swainsonii / Superb Parrot	72_DNG	0.3	1.00
Swainsona sericea / Silky Swainson-pea	72_DNG	1.2	5.00

Credit Retirement Options

Like-for-like credit retirement options

Austrostipa metatoris / A spear-grass	Spp	IBRA subregion

BAM Biodiversity Credit Report (Like for like)

	Austrostipa metatoris / A spear-grass	Any in NSW
Diuris tricolor / Pine Donkey Orchid	Spp	IBRA subregion
	Diuris tricolor / Pine Donkey Orchid	Any in NSW
Polytelis swainsonii / Superb Parrot	Spp	IBRA subregion
	Polytelis swainsonii / Superb Parrot	Any in NSW
Swainsona sericea / Silky Swainson-pea	Spp	IBRA subregion
	Swainsona sericea / Silky Swainson-pea	Any in NSW

A.2 MW433 BAM Biodiversity Credit Report (Like for Like)



BAM Biodiversity Credit Report (Like for like)

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00026165/BAAS17037/21/00026166	APA East Coast Grid Expansion Mod 1 - MW433	10/06/2021
Assessor Name	Assessor Number	BAM Data version *
Nathan Garvey	BAAS17037	45
Proponent Names	Report Created	BAM Case Status
	12/08/2021	Finalised
Assessment Revision	Assessment Type	Date Finalised
0	Major Projects	15/07/2021

* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.

Potential Serious and Irreversible Impacts

Name of threatened ecological community	Listing status	Name of Plant Community Type/ID
Nil		
Species		
Nil		

Additional Information for Approval

PCTs With Customized Benchmarks

Assessment Id	Proposal Name
00026165/BAAS17037/21/00026166	APA East Coast Grid Expansion Mod 1 - MW433



BAM Biodiversity Credit Report (Like for like)

PCT

No Changes

Predicted Threatened Species Not On Site

Name

No Changes

Ecosystem Credit Summary (Number and class of biodiversity credits to be retired)

Name of Plant Community Type/ID	Name of threatened ecological community	Area of impact	HBT Cr	No HBT Cr	Total credits to be retired
153-Black Bluebush low open shrubland of the alluvial plains and sandplains of the arid and semi-arid zones	Not a TEC	6.3	0	0	0

BAM Biodiversity Credit Report (Like for like)

153-Black Bluebush low open shrubland of the alluvial plains and sandplains of the arid and semi-arid zones	Like-for-like credit retirement options					
	Class	Trading group	Zone	HBT	Credits	IBRA region
	Aeolian Chenopod Shrublands This includes PCT's: 151, 152, 153, 154, 222, 225	Aeolian Chenopod Shrublands <50%	153_Disturbed	No	0	White Cliffs Plateau, Barrier Range Outwash, Central Depression, Cuttaburra-Paroo, Mootwingee Downs, Paroo Overflow, Paroo-Darling Sands and Urisino Sandplains. or Any IBRA subregion that is within 100 kilometers of the outer edge of the impacted site.

Species Credit Summary

Species	Vegetation Zone/s	Area / Count	Credits
Antaresia stimsoni / Stimson's Python	153_Disturbed	6.3	14.00
Ardeotis australis / Australian Bustard	153_Disturbed	6.3	14.00
Atriplex infrequens / A saltbush	153_Disturbed	6.3	14.00
Lucasium stenodactylum / Crowned Gecko	153_Disturbed	6.3	14.00

Credit Retirement Options

Like-for-like credit retirement options

BAM Biodiversity Credit Report (Like for like)

Antaresia stimsoni / Stimson's Python	Spp	IBRA subregion
	Antaresia stimsoni / Stimson's Python	Any in NSW
Ardeotis australis / Australian Bustard	Spp	IBRA subregion
	Ardeotis australis / Australian Bustard	Any in NSW
Atriplex infrequens / A saltbush	Spp	IBRA subregion
	Atriplex infrequens / A saltbush	Any in NSW
Lucasium stenodactylum / Crowned Gecko	Spp	IBRA subregion
	Lucasium stenodactylum / Crowned Gecko	Any in NSW