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Sent:	Friday, 25 February 2022 4:10 PM
To:	Tatsiana Bandaruk
Cc:	Iwan Davies
Subject:	RE: Project EnergyConnect (NSW - Eastern Section) (SSI- 9172452) - Request for Advice on EIS

Tatsiana

Thankyou for the opportunity to comment on this SSI application.

Councils primary concerns relate to the establishment of the Wagga Wagga Construction Compound and the impact of the project works primarily in regard to Council's road infrastructure.

Wagga Wagga Construction Compound

The application details the location of the proposed compound, however no further information can be identified with respect to the development of this area.

Any consent should require that final details of the design and layout of this compound be submitted for approval prior to commencement of any work associated with its establishment. This should include as a minimum:

- Final access location and design details of intersection works within the Ashfords Road.
- Setout of temporary structures, temporary site buildings, storage areas and vehicular movement areas.
- Appropriate buffers and protections measure for existing drainage lines and vegetation on the site. Note parts of the site are subject to major overland flow flooding.
- Dust, sediment and erosion control measures.
- Stormwater management.
- On site waste management including sewage waste.
- Establishment of appropriate security fencing and buffer setbacks to boundaries including Ashfords Road.

The compound is located on land that is within the Lake Albert Catchment. Lake Albert is an extremely important recreation and environmental asset for the Wagga Wagga community. Matters identified above including stormwater management, sediment and erosion control, management of effluent waste and protection of waterways and vegetation are critical to the protection of water quality within this catchment.

The application does not examine the impact on the continued safe operation of Ashfords Road noting that the compound will act as the main staging area for the Wagga Wagga Substation upgrade and will likely necessitate the regular movement of equipment, materials and vehicles back and forth across the roadway. The proponent should consider the possibility of a smaller compound specifically for the substation upgrade on the western side of Ashfords Road to avoid this conflict. A further compound catering for the transmission line upgrade could then be sited in an alternate location more readily accessible to these works and also to primary supply routes (such as the Olympic Highway south of Uranquinty) thereby minimising haulage impacts on roads (and intersections) such as Boiling down Road, Ashfords Road and Gregadoo Road.

Alternatively, specific management practices will need to be in place to coordinate construction activity movements across the roadway without impinging on its continued operation which includes ongoing public access to Council's Gregadoo Waste Management Facility.

Rehabilitation of the compound needs to be addressed in any consent to ensure that the site of the compound is returned to its original status within a reasonable time frame following completion of works.

Wagga Wagga Substation upgrade

It is noted that all works will be contained within the confines of the site and no changes are proposed with respect to operation access to the site.

It is uncertain as to whether temporary construction access is proposed to the site during the upgrade. Any temporary access should have regard to the comments below and also consideration with respect to the comments provided above relating to construction activities across Ashfords Road.

The upgrade will require additional stormwater works that will connect into the existing stormwater management system on the site. It is uncertain as to where this system currently discharges to. Any works should ensure that this discharge point or any adjacent infrastructure is not impacted through the increase in rate or volume of discharge.

Work site accesses to public roads

Various accesses will be required from public roads for construction works associated with the individual transmission towers. This may involve the establishment of temporary construction access within the road reserve or alternatively upgrades to existing access points within the road reserve. Council will require that the proponent obtain approval under Section 138 of the Roads Act 1993 is required from Council for any works within the road reserve. This process may also require the preparation of Temporary Traffic Management Plans for the works.

Any consent granted should also ensure appropriate measures are in place to provide for the removal of any temporary accesses upon completion of works and the reinstatement/rehabilitation of the road reserve and Council infrastructure.

Damage to and suitability of Council road infrastructure

Council request that appropriate requirements be in place for pre-construction dilapidation assessment of all road (and related) infrastructure for nominated haulage and construction routes in consultation with Council.

This assessment should also allow for Council to determine the suitability of the current condition of haulage roads and intersections for the anticipated traffic and the requirement for pre-work upgrades to occur if deemed necessary. This is of particular importance for nominated unsealed haulage roads such as Rowan Road and Boiling Down Road which will experience a substantial increase in traffic volumes and are potentially unsuitable in their current condition.

Council has previously sought upgrades in relation to Ashford Road and Boiling Down Road as part of the Gregadoo Solar Farm project on adjacent land – SSD 8825. This project proposed a substantially lesser traffic impact however warranted the following condition requirement under consent SSD 8825.

Road Upgrades

- 5. Prior to the commencement of construction, the Applicant must:
 - upgrade the intersection of Mitchell Road and Ashfords Road, including providing a Basic Right Turn Treatment (BAR); and
 - (b) upgrade the intersection of Ashfords Road and Boiling Down Road, including sealing Boiling Down Road a minimum length of 30 m from its intersection with Ashford's Road,

in accordance with the Austroads Guide to Road Design, to the satisfaction of the relevant roads authority.

This emphasises the need for any consent to include provisions for this detailed assessment to occur in consultation with Council and any necessary upgrades to be undertaken.

Appropriate mechanisms will be required ensure that the proponent is responsible for the cost to repair any damage that is deemed to have been caused by the project activities through an appropriate post-construction dilapidation assessment process.

If you require further information or clarification regarding the matters raised, please let me know.

Cameron

Cameron Collins

Development Assessment Coordinator

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Wagga Wagga City Council acknowledges the traditional custodians of the land, the Wiradjuri people, and pays respect to Elders past, present and future and extends our respect to all First Nations Peoples in Wagga Wagga. We recognise and respect their cultural heritage, beliefs and continuing connection with the land and rivers. We also recognise the resilience, strength and pride of the Wiradjuri and First Nations communities.