

Coonabarabran:

14-22 John Street
Coonabarabran NSW 2357

PO Box 191
Coonabarabran NSW 2357

ABN: 63 348 671 239



Calls from within Shire
1300 795 099

Calls from outside Shire area
Coonabarabran:
02 6849 2000

Coolah: 02 6378 5000

Fax: 02 6842 1337

Email:
info@warrumbungle.nsw.gov.au

Coonabarabran - Coolah - Dunedoo - Baradine - Binnaway - Mendooran

Please address all mail to:
The General Manager

Please refer enquiries to:

L Ryan
Doc ID 159971

23 September 2022

Energy Assessments | Planning and Assessment
Department of Planning and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

natasha.homsey@planning.nsw.gov.au

Dear Natasha

Central-West Orana REZ Transmission (SSI-48323210) – request for input into SEARS

On 12 September 2022 Council was forwarded a copy of the draft Planning Secretary's Environmental Assessment Requirements (SEARS) for the proposed Central-West Orana REZ Transmission project and asked to provide our input into the SEARS. Our comments were due back to Department of Planning (DOP) by 26 September 2022.

After reviewing the SEARS and the accompanying *Central-West Orana Renewable Energy Zone Transmission Project Scoping Report* dated September 2022, Council makes the following comments and seeks these matters to be included in the SEARS:

1. Acquisition of land for easement for powerlines will cause fragmentation of rural lands, how will fragmented land and orphan lots be addressed, and will there be lost planning opportunities for affected landholders in the future?
2. How will landholders be fully and fairly consulted and compensated for land compulsorily acquired for the line easement, bearing in mind prime agricultural land will be impacted?
3. How and where will the construction workforce be accommodated? If a worker's camp/s is proposed, the location is to be identified in EIS. Council prefers such camps to be located close to a main community so our communities can benefit economically.

4. Bushfire – who will be responsible for maintaining underneath the transmission line during and after the build to ensure fuel loads are kept to a minimum, how will this be carried out?
5. Figure 2-4 February 2022 Revised study corridor (EnergyCo, 2022) on page 24 of the Scoping Study shows the Uarbry Energy Hub – there is no other mention of this Energy Hub throughout the document either in word or in mapping. Is there an Energy Hub being constructed at Uarbry or not?
6. There are a number of threatened ecological communities across the project site, Council expects the EIS will contain a full assessment, not just a desktop survey; and biodiversity credits will need to be achieved. The location of offsets is of interest to Council particularly if located within the Warrumbungle LGA, could this please be advised?
7. Areas surrounding the project site have presence of Aboriginal artefacts - appropriate land searches need to take place to identify any artefacts that are present to enable management and mitigation measures to be implemented, not just desktop surveys. Whilst permits to destroy artefacts may or may not be needed, Council request consultation with relevant interest groups to be undertaken prior out of respect.
8. Cumulative impacts on our communities, roads and local infrastructure from the developments and projects associated with the Renewable Energy Zone (REZ) are of major concern to Council. From our current knowledge of the REZ and discussions with various renewable energy developers, many proposed development timeframes appear to be aligning and will occur at the same time. Council prefers a staged approach for State Significant Development (SSD) within the REZ, and seeks for this to be included in the SEARS. How will cumulative impacts be reduced, the draft SEARS make a statement, but this is high level only, Council expects details to be provided in the EIS on accommodation, workforce, water, roads, aggregate and build materials, traffic numbers, waste materials, telecommunications etc.
9. With more than one LGA involved there needs to be consideration given to the structure of the VPA. Council will be seeking for a VPA to be entered into with the VPA covering all phases of the project; including being supportive of and recognising the damage that vehicles in all phases of the project will do to our road network including bridges and major culverts.
10. Whilst the project claims to provide long-term strategic benefits to the state of NSW, a more reliable energy supply for the Warrumbungle LGA would be welcomed. Please include a clause in the SEARS that the developer is to seek initiatives to generate and provide a more reliable electricity source from the project to the local communities within our LGA. It seems at odds that our LGA is being used to generate power to be used in other areas of the State, yet our own LGA struggles to have a reliable supply.
11. The stakeholder engagement list is missing some key organisations; Dunedoo Coolah Landcare, Local Emergency Management Committee, Siding Spring Observatory; these stakeholders should be included.

12. The Coolah Aerodrome has been omitted from the Scoping Study and should be noted by the Applicant, and an assessment made as to whether the proposed transmission line will have any impact on the obstacle limitation surfaces and on aerial spraying activities in the vicinity of the proposed turbines.
13. It is noted waste streams are mentioned in the SEARS, though the volumes (amount) of each waste stream has not been requested, Council seeks for this to be included. Council requests all waste materials to be recycled where possible during the life of the project.
14. The project is located within 200km radius of the Dark Sky Park associated with Siding Spring Observatory – consultation with the Observatory should be undertaken.
15. Council requires full details of water volumes required for the total project along with aggregate types and volumes for all facets of construction.
16. In relation to transport, Council requests the specific matters to be included in the SEARS –
 - an assessment of the capacity of the existing road network including bridges and major culverts to accommodate the type, mass (axle and gross) and volume of traffic generated by the project (including restricted access vehicles and over-mass/over-dimensional traffic haulage routes from port) during construction, operation and decommissioning;
 - an assessment of the likely transport impacts to the site access and haulage routes, site access points, any rail safety issues, any Crown Land (including existing Travelling Stock Route network) particularly in relation to the capacity and conditions of the roads, bridges and major culvert and use of rail level crossings (and rail safety assessment if required), and impacts to rail underbridges and overbridges;
 - provide details of measures to mitigate and/or manage potential impacts including a schedule of all required road upgrades (including resulting from restricted access and over mass/over dimensional traffic haulage routes), road maintenance contributions, and any other traffic control and safety measures including dust management, developed in consultation with the relevant road and/or rail authority;
 - predicted impact on Council roads; details of roads to be upgraded and annual road maintenance contributions, including what ongoing maintenance is expected to be required?
 - traffic numbers generated by the proposed development are to be calculated realistically.
17. It appears that local roads in Warrumbungle Shire will be used for heavy vehicles associated with the project. There may also be some impact on the heavy vehicle rest area in Dunedoo. Additional assessment will be conducted by Council on receipt of application for HV access via the NHVR if they

require access to Council's road network for restricted access and OSOM vehicles. Council would be requesting a Traffic Management Plan/Route Assessment as part of the approval process for restricted access and OSOM vehicles.

18. The scoping study suggest routes to be utilised will be documented, however suitable access would need to be constructed where there are no existing roads or tracks – who will be paying for the maintenance of the new accesses and tracks etc??
19. It is likely that light vehicles or trucks not requiring permits will use other roads than those listed in the scoping study. If Council roads are required to be used, Council will require additional information to assess the impact and to determine contribution required.
20. Noise impacts from heavy vehicle movements particularly in the construction phase has not been directly considered in either the draft SEARS or the scoping study. This is of particular importance for the community of Dunedoo.
21. It is noted in the scoping study helicopters will be used to erect towers. How will this activity coincide with wind turbines located within close proximity to the transmission line, and the risk of helicopter/s striking a wind turbine?
22. Council expects a high standard of stakeholder engagement and community consultation to be undertaken across our communities and an effective Social Impact Assessment report to be produced. A robust assessment should be carried out.
23. Will there be an EnergyCo office based in Coolah or Dunedoo to address queries raised by the local communities?
24. Media listed on page 48 of the scoping study should also include Coonabarabran Times.
25. How many jobs will be generated, and how many jobs will remain after the construction phase is over?
26. Will any heritage items be impacted?
27. Could the economic benefits of the proposal be calculated via Council area (LGA); the scoping study suggests via region and State only?
28. Will all impacts be addressed upfront and mitigation measures devised prior to consent, or will there be a series of management plans required as part of the consent addressing impacts afterwards?
29. Council requests frequent, full and ongoing engagement with EnergyCo so we are kept abreast of the process regarding the planning of the project. We also request EnergyCo to be proactive and keep Council fully informed and engaged. Council is a key stakeholder and thus seeks active involvement.

Should you have any comments or questions in relation to the above inclusions,
please contact Council on 02 68 492000

Yours sincerely



LEEANNE RYAN
DIRECTOR ENVIRONMENT AND DEVELOPMENT SERVICES