

SSD2024-1 Part 1
AD24/14449
Parcel 52711
DTQ:DQ



28 February 2024

NSW Department of Planning, Housing & Infrastructure
Energy Assessments
12 Darcy Street, 4 Parramatta Square
PARRAMATTA NSW 2150

Dear Ellena Tsanidis

STATE SIGNIFICANT DEVELOPMENT- 67667971 Aquila Wind Farm

Property: Scoping Report - Appendix 9 Schedule of Land
Proposed development: Aquila Wind Farm - SSD-67667971

Thank you for your correspondence dated (email) dated 15 February 2024 regarding the abovementioned project. Council Officers have undertaken a preliminary assessment of the proposal and the following comments are provided for input into the draft SEARs:

(1) Bushfire Prone Land

The subject land is partly designated as being Bushfire Prone by reason that a portion of the development site is designated Bushfire Vegetation Category 1, under the Rural Fire Service Commissioner's Bush Fire Prone Land Map. Despite the designation arising from the bushfire mapping, the land is also bushfire prone by reason of the grassland hazard present on the land which is not designated under the current Commissioner's map.

While noting that the Scoping Report under clause 6.2.7.7 (page 101) identifies that Planning for Bushfire Protection 2019 (PBP 2019) will be addressed in the development's EIS, detailed investigation of the grassland bushfire hazard needs to be undertaken, noting consultation with NSW Rural Fire Service.

(2) Building Works – Lack of Detail

It is noted that the draft SEARs states: *The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation ...*. The Scoping Report indicates that the following buildings, structures and facilities will be provided for the initial construction and operation of the development:

- Operations and maintenance buildings (O&M) will be established for the day to day operation of the Project;



All communications to: **CHIEF EXECUTIVE OFFICER**

ABN 53 539 070 928

PO Box 81 Dubbo NSW 2830

T (02) 6801 4000 **F** (02) 6801 4259 **E** council@dubbo.nsw.gov.au

Civic Administration Building Church St Dubbo NSW 2830

W dubbo.nsw.gov.au

- Substation, switchyard and transmission cables/powerlines and facilities;
- Temporary facilities used for the construction, repowering and/or decommissioning of the Project, including but not limited to temporary site offices, amenities, and compounds, concrete batching plants;
- Permanent worker facilities;
- A 100 MW/200 MWh BESS.

However, regarding the above permanent buildings, structures and facilities, there are no indicative site plan(s) of the proposed O&M compounds, floor plans and elevations for the proposed permanent buildings and facilities within the Scoping Report. Whilst Figure 3.1 (page 25) provides indicative locations for the proposed substation, compounds and BESS, no other details are outlined in the Scoping Report.

On previous occasions with proposed SSD's, Council has identified the lack of detail associated with the permanent buildings associated with the development, which may require a Construction Certificate. No floor plans, elevation and site plans have been indicated / provided, nor any generic details for such buildings.

This becomes problematic when a PCA has an application seeking a Construction Certificate.

(3) Roads and Transport

While the draft SEARs makes general reference to Transport, Council's Infrastructure Strategy & Design Branch has reviewed the Scoping Report and notes a number of issues that need to be specifically addressed in the Environmental Impact Statement.

- Identify the proposed transport route.
- Provide a transport route assessment.
- Provide a Traffic Impact assessment.
- Identify site access locations.
- Provide proposed access intersection treatments.
- Provide details of proposed public road upgrades.

(4) Environmental

It is noted that the Scoping Report refers to bird strike and barotrauma, but monitoring and offsetting/mitigating processes need to be addressed.

The impact of tree removal along rural roads to accommodate the transportation of large blades needs to be addressed and offset, either through the Biodiversity Offset Scheme or an alternative more locally targeted mechanism.

(5) Planning Agreement

A Planning Agreement is required to be negotiated and agreed to with Council for the project by the Proponent. Council has an adopted Community Benefit Framework, which requires

renewable energy projects to contribute a total of 1.5% of the project Capital Investment Value for wider benefits for our community.

Benefit/s to the community includes (but may not be limited to) the following:

- Road infrastructure provision and maintenance;
- Housing opportunities and initiatives;
- Strategic planning;
- Economic development and investment attraction opportunities and initiatives;
- Skills development;
- Community facilities and recreation opportunities;
- Youth welfare and support;
- Town centre development and maintenance in Wellington;
- Other infrastructure provision that provides for the continued health, wellbeing and development of the community.

However, it should be noted that the primary impacts of the development need to be considered and ameliorated as part of the State Significant Development process.

(6) Workforce Accommodation

With the range, timing and workforce requirements of projects in the Central West and Orana Renewable Energy Zone, workforce accommodation is required to be carefully considered to ensure projects do not unreasonably impact communities of interest.

Council requests that the EIS include a preliminary accommodation plan, which identifies the accommodation requirements of the project, existing accommodation and how the project is proposing to provide accommodation for employees. It is noted that the Scoping Report includes discussion around a temporary workers camp.

If you have any enquiries in this matter, please do not hesitate to contact Mr Quigley during normal office hours, on 6801 4000.

Yours faithfully



Darryll Quigley
Manager Building and Development Services