



Greater
Hume
Council

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Karl Okorn
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Energy Assessments
Department of Planning, Industry and Environment
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Dear Mr Okorn

Greater Hume Council Endorsed Submission to the Environmental Impact Statement (EIS) – Glenellen Solar Farm

I refer to the Notice of Exhibition of the EIS for the Glenellen Solar Farm (proposed development) which was received by Council on 27 October 2020. It is advised that Council has reviewed the Environmental Impact Statement and at an extra-ordinary meeting held on 26 November 2020, Council resolved to **formally object** to the proposed development for the following reasons:

1. The development will result in adverse environmental, social and economic impacts for the local community

There are many nearby receptors to the proposed development and the EIS identifies 84 sensitive receivers within a 2 kilometre radius.

Council is of the opinion that the proposed development will lead to poor social and environmental outcomes through a loss of amenity for nearby residents in that the immediate landscape will dramatically change from prime agricultural land, to be a landscape with an industrial appearance with a development footprint of 332 hectares, that incorporates solar panels on tracker units up to 5 metres high, site and amenity buildings, access roads, inverter stations, high voltage substations and 2.5 metre high perimeter fencing. Council believes that the proposed landscaping will not provide a timely response to address the amenity loss of nearby receivers. Council is concerned about the cumulative visual impacts for some receivers who will have cumulative visual impacts to both the Glenellen Solar Farm and the Jindera Solar Farm.

As mentioned there are 84 receivers located within 2 kilometre of the proposed development and therefore Council is concerned about the potential for the heat island effect to adversely impact upon localised climatic conditions and result in heat transmission out of the solar farm and into neighbouring properties.



The EIS relies upon several studies that have been undertaken to discuss the heat island effect caused by PV arrays however, there is no cited Australian studies on the heat island effect in the same context as the Glenellen Solar Farm that is in very close proximity to the Jindera Solar Farm. This is of concern to Council as it may not be appropriate to extrapolate the results of international studies on the heat island effect to localised conditions where this development is large, with another nearby large proposed solar farm development, there are many receivers that are as very close to the property boundary and the mean summer maximum temperature is 32.3°C. Council is also concerned about the cumulative effects of the heat island effect on some nearby residences which in some instance are bordered on both sides by the two solar farms.

The EIS should have discussed what mitigation measures that the proponent could take to minimise adverse outcomes caused by the heat island effect.

Council is concerned about the proposed development producing a dust nuisance during construction, but particularly during its operational phase. The local area enjoys a reasonably high average rainfall and therefore it is not common for land in the vicinity of the proposed development to be devoid of vegetation. Consequently, nearby receptors currently do not experience any significant issues in relation to dust. Council believes that the use of tracking systems and efficient PV cells will dramatically reduce the amount of solar energy reaching the soil beneath the solar arrays and over the thirty year life of the development it could be increasingly difficult to maintain vegetation cover. Given the scale of the development site (332 hectares), there may be the potential for barren earth beneath solar arrays to be a significant source of dust for nearby receptors.

The EIS effectively explains the social and economic benefits of the proposal which includes a discussion on how local farmers and the community who will benefit from an additional source of income that is independent of agriculture. During the construction phase the EIS indicates there will be 200 staff employed with many of these drawn from the local community. The EIS reveals that construction employment is for a period of time being 18 months with the numbers employed reducing outside of this period.

Despite the company espousing a commitment to where ever possible procure from the local economy, it is felt that most of the benefits from the construction employment will not be able to be capitalised upon by the Jindera community as there is very limited temporary accommodation available. Workers will most likely be accommodated in the nearby regional centre of Albury/Wodonga.

It is advised that the proponent has had minimal engagement with Council in relation to a payment to Council of a development contribution associated with the proposed development.

Since 2012 Greater Hume Council has had a shire wide fixed development consent levy either complying with Section 94A or it replacement Section 7.12 of the Environmental Planning and Assessment Act 1979.

Council has applied the provisions of its fixed development contribution plan on more than 300 occasions irrespective whether there is an impact of the development on local infrastructure with the funds being used for provision, extension, augmentation of public amenities and public services.

Given Greater Hume Council's long standing application of a fixed development contributions levy and the impact of the development on the local community, a failure by the proponent to pay a development contribution to Council that is commensurate

with the current Greater Hume Council's Section 7.12 Development Contribution Plan 2019 would also be an adverse social outcome.

2. The proposed development will restrict the ability for Jindera to grow in the direction of the subject land

The proposed development is located approximately 1.0 kilometres from the nearest residential development in Jindera. It is advised that Jindera is enjoying a reasonable rate of growth and Council continues to undertake strategic planning activities to ensure there is sufficient land available to accommodate demand.

In terms of being suitable for development for residential purposes, some areas around Jindera are constrained due to the effects of flooding and other limitations such as the presence of native vegetation. The land in the direction of the proposed development does not appear to be as constrained as other land.

Over the next thirty years, which is the life of the proposed development, it is possible that growth opportunities for Jindera would have been pursued in the direction of the proposed development. Given the impacts of the proposed development, it is unlikely that future residential development should be pursued in the vicinity of the proposed development which is an opportunity cost of the proposed development for both the local community and, particularly for nearby landowners who are uninvolved in the proposed development.

3. Safety concerns in relation to the proposed access route to the development

Council is concerned about the proposed transport route which approaches the site primarily from the north and has been designed to minimise the effects of the development proposal upon the Jindera township. Council's primary concern is the use of Glenellen Road which is a sealed undivided local road of 5-7 metres in width. Council believes that the construction of this road is unsuitable to safely accommodate the increased development traffic of up to 100 heavy vehicles per day and peak staff movements of 200 vehicles per day.

Council believes that the entire transport route be reconsidered to approach the site from the south utilising Urana Road and Jindera-Walla Walla Road.

4. Loss of high quality agricultural land

Council has reviewed the Department of Planning, Industry and Environment's Large Scale Solar Energy Guidelines in which there is a discussion about the importance of site selection. Agriculture is identified as a key site constraint and the guideline refers to land meeting the following:

important agricultural lands, including Biophysical Strategic Agricultural Land (BSAL), irrigated cropping land, and land and soil capability classes 1, 2 and 3. Consideration should also be given to any significant fragmentation or displacement of existing agricultural industries and any cumulative impacts of multiple developments.

The EIS indicates that the land on which the subject development is classified as class 3 land and class 6 under the Land and Soil Capability Assessment Scheme. Perusal of the EIS reveals that 153 ha of the development footprint is situated on the Class 3 High Capability Land and 181 ha of Class 6 Low Capability Land.

Council has been advised that this land will be mapped as important agricultural land under the Riverina Murray Draft Important Agricultural Land Mapping project which also indicates it is high quality agricultural land.

Consequently, as this site is important agricultural land and contains soils classed as capability class 3, the site should be considered constrained under the Department of Planning, Industry and Environments Large Solar Scale Energy Guidelines.

The EIS indicates that when the development is to be decommissioned underground cabling is proposed to be left in-situ when beneath a depth of 500mm in the soil which does not align with the comments from DPI agriculture which states: *"A rehabilitation and decommissioning strategy that will ensure that the land is returned to its predevelopment state. The rehabilitation and decommissioning strategy should include the removal of all underground infrastructure to ensure all previously cropped lands and returned to their predevelopment state"* Council is of the opinion that it should be a requirement that the cabling would be removed.

Due to the loss of the high quality agricultural land, Council believes that the proposed development does derogate from the RU1 zone objectives contained in the Greater Hume Local Environment Plan 2012 which are:

- To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.
- To minimise the fragmentation and alienation of resource lands.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.
- To maintain the rural landscape character of the land.

5. Impacts on Native Vegetation

The EIS has undertaken very detailed studies concerning the biodiversity impacts and impacts on Aboriginal cultural heritage that will occur if the proposed development does proceed. Whilst Council is satisfied with the rigour of the assessment of these impacts, it does believe that the removal 11.4 hectares of native vegetation and 81 paddock trees demonstrates the constrained nature of the site of the proposed development.

The following traffic related recommended conditions are provided in the event of the approval of this application:

- To enhance safety Council requests further improvement treatment options for Jindera-Walla Walla Road intersection with Linder Road to be submitted to Council for consideration.
- Improvements should be undertaken to turning facilities at the intersection of Urana Road/Walla Walla Jindera Road.
- A preconstruction dilapidation study of Ortlipp and Linder Roads is to be undertaken to Council's satisfaction and these roads are both to be fully reinstated at the proponents cost to preconstruction standards and the conclusion of the construction phase.
- Roadworks are to be undertaken in accordance with the submitted traffic assessment.
- For assessment by Council additional design plans are required for the access points.
- Under Section 138 of the Roads Act 1993 any works occurring within the road reserve require the consent of Council as the road authority.
- The traffic management plan stipulate that within the Jindera township there be no heavy vehicle movements during school zone speed restriction times ie 8am – 9.30am and 2.30pm – 4pm.
- No heavy vehicles are to be parked within Jindera township during the school zone speed restriction times ie 8am – 9.30am and 2.30pm – 4pm.

Should you require further information please contact Colin Kane, Director Environment & Planning, on 6044 8928 or email ckane@greaterhume.nsw.gov.au.

Yours faithfully



Colin Kane
Director Environment & Planning
GREATER HUME COUNCIL

27 November 2020

Our Ref: CK:SG
