

Tamworth Solar Farm

Submissions Report

Prepared for: Tamworth Solar Farm Pty Ltd
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This Submissions Report has been prepared by PROJECTe on behalf of Tamworth Solar Farm Pty Ltd.

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Abbreviations

AC	Alternating current
AEMO	Australian Energy Market Operator
APZ	Asset Protection Zone
BDAR	Biodiversity Development Assessment Report
BESS	Battery energy storage system
CEMP	Construction Environmental Management Plan
CHMP	Cultural Heritage Management Plan
CTMP	Construction Traffic Management Plan
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
kV	Kilovolt
MW	Megawatt
MWh	Megawatt-hour
NEM	National Electricity Market
OEMP	Operational Environmental Management Plan
PCU	Power Conversion Unit
PV	Photovoltaics
RAPs	Registered Aboriginal Parties
TfNSW	Transport for New South Wales
TIA	Traffic Impact Assessment
WAD	Works Authorisation Deed

1 Introduction

Overview of the project

Tamworth Solar Farm Pty Ltd proposes to develop a solar farm near Somerton, approximately 25 km west of Tamworth, New South Wales. The proposed Site is within an area of agricultural land at “Bonnie Brae” 2209 Soldier’s Settlement Road, Bective, on a single land title of approximately 230 hectares for which Tamworth Solar Farm Pty Ltd have secured an option to purchase. The rated output of the solar farm will be 65 MW (AC) and the facility will include a 19 MW/19 MWh battery energy storage system (BESS).

The 132 kV Tamworth to Gunnedah transmission line crosses over the southern part of the Site. A new substation will be built and a connection to the existing transmission line will be made from the new substation.

The proposed Site and surrounding area is mostly agricultural land, cleared of native vegetation, with current activities including grazing and dryland cropping. There are several scattered, isolated shade trees in poor condition. No permanent watercourses cross the property. There is an existing residential dwelling on the property which will be used as the Site administration office during operation.

In addition to the solar farm at Bonnie Brae, some roadworks are required along the transport route from the Oxley Highway. This work will include:

1. The construction of a deceleration lane on the Oxley Highway at the intersection with Babbinboon Rd.
2. The sealing of the intersection of Babbinboon Rd and Warminster Rd and the removal of one tree on this corner to improve the line of sight.

Purpose of this document

Tamworth Solar Farm Pty Ltd lodged an Environmental Impact Statement (EIS) with the Department of Planning, Industry and Environment (DPIE) in January 2020. The EIS was on exhibition from late January to the 26th of February. The Department received 16 submissions on the project, including 12 from government agencies and six from the general public (individuals and organisations). Of the six comments from the public, four were “Supports”, one was a “Comments” and one was “Objects”.

This document provides Tamworth Solar Farm Pty Ltd’s response to these submissions.

2 Response to submissions

Tamworth Solar Farm's responses to the submissions from agencies and the public are included in the tables below.

Tamworth Regional Council

Subject & Number	Agency Comment	Tamworth Solar Farm Response
General A1	<p>A general condition should be imposed regarding implementation of all mitigation measures identified within Section 6 of the Environmental Impact Statement (EIS).</p> <p>Suggested Condition</p> <p>➤ <i>The mitigation and management measures recommended in the endorsed supporting documents, must be implemented throughout the construction phase and operation of the facility;</i></p> <p><i>Section 6 of the Environmental Impact Statement, prepared by Projecte, Revision 2 dated 22 January 2020</i></p>	<p>Tamworth Solar Farm anticipates that the Department of Planning, Industry and Environment will issue a standard condition as part of the Administrative Conditions that the proponent must carry out the development generally in accordance with the EIS.</p>
Biodiversity A2	<p>The EIS mentions the requirement for entry into a Biodiversity Offset Scheme due to removal of 19 trees within a section of the property defined as Category 2 land (grassy box woodland). The remainder of the site that has a cropping and grazing history has been defined as Category 1 land and therefore does not require offsetting. A condition should be placed in any forthcoming consent around the requirement for the Proponent to enter into an Offset Scheme for the removal of on-site trees as identified within the EIS.</p> <p>Suggested Condition</p> <p>➤ <i>The Proponent shall prepare a biodiversity offset strategy following final design, in consultation with Office of Environment and Heritage, to the satisfaction of the Secretary. The offset strategy is to be prepared by an ecologist and submitted for approval prior to the commencement of construction.</i></p>	<p>The project will generate nineteen ecosystem credits. Tamworth Solar Farm intends to satisfy the offset requirement by payment into the Biodiversity Stewardship Payments Fund. We anticipate that the Department of Planning, Industry and Environment will issue a condition relating to the retiring of biodiversity credits. We do not see the need to prepare an offset strategy. Furthermore, the Biodiversity and Conservation Division have not requested such a condition.</p>

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Traffic A3	<p>Whilst it is noted in the EIS that along the transport route from the Oxley Highway to the Site entrance, bends and intersections will be sealed, Council requests that further improvements to other sections of road along the transport route between Oxley Highway and the Site be undertaken. The following comments are made in relation transport route road infrastructure and traffic movements.</p> <p>Concerns are raised by Council and nearby residents due to the proposed increase of construction traffic along Babbinboon Road, Warminster Road and Soldiers Settlement Road (the transport route) and the limited capacity for these roads to carry a significant increase in light and heavy vehicle movements without substantial upgrades pre-construction and without ongoing monitoring of road conditions throughout construction (including upon completion) of the development.</p> <p>Some of the concerns raised from residents along the transport route include:</p> <ol style="list-style-type: none"> 1. A number of houses are very close to the road and dust generated from the construction traffic will cause issues on existing residents. 2. In wet weather Babbinboon Road, Warminster Road and Soldiers Settlement Road can deteriorate quickly. 3. In dry times the roads shows signs of breaking away and can be subject to dangerous corrugation and potholes. 4. Sections of the transport route have an inadequate road width to be able to have two full lanes of traffic to allow acceptable passing to occur. 5. School busses use the transport route and the application does not factor into account the potential impact on school buses when stopping to drop off/pick up children. <p>In the submissions received by Council, it was requested to seal the affected roads as a way to deal with the <i>“serious impacts on the public infrastructure and minimise the impact on the community”</i>.</p> <p>The following additional observations and concerns are raised by</p>	<p>At a meeting with Tamworth Regional Council on the 16th March, it was resolved that:</p> <ol style="list-style-type: none"> 1. Tamworth Solar Farm would seal sections of Babbinboon and Warminster Roads for a distance of 100m either side of houses near (within 250m) the road to support road quality and dust suppression. 2. A survey of the transport route from the Oxley Highway to the site would be conducted with Council to determine what works need to be conducted to ensure that the route is safe and fit for purpose for construction traffic and residents including the passing of heavy vehicles. <p>Any works to be conducted on the roads will be done within the existing footprint of the road with the exception of the deceleration lane at the Oxley Hwy and the removal of the single tree near the junction of Babbinboon Rd and Warminster Rd.</p> <p>There are no school buses that travel any section of the transport route from the Oxley Highway to the site. School children catch buses on the Oxley Highway near the intersection with Babbinboon Road.</p> <p>The acacia that is to be removed at the junction of Babbinboon and Warminster Road is immediately next to another tree as shown in Table 1-2 of the Biodiversity Development Assessment Report. The preference of the proponent is that this acacia will be removed using a chainsaw leaving the other tree in place and the ground not disturbed. This will not cause destabilization of the</p>

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	<p>Council:</p> <ol style="list-style-type: none"> 1. The intersection of Warminster Road with Babbinboon Road is discussed in the EIS and the associated Traffic Impact Assessment. However, the documentation is silent on the matter of the poor angle of approach on the minor leg of this intersection. This element should be investigated in detail, and the geometry revised if required. 2. The Traffic Impact Assessment recommends the removal of an existing tree at the intersection of Warminster Road with Babbinboon Road with the objective of improving sight distance to the west. This tree is likely to be contributing the stability of the watercourse in this location. Consideration should be given to under-pruning the tree as an alternative to removal. 3. Several sections of unsealed roadway along the proposed access route are low-lying, resulting in inundated and trafficable shoulders and swale drains during wet weather. Concern is raised with regards to the ability of the roadways to adequately cater for passing vehicles under these conditions. This aspect should be investigated, and upgrades recommended where appropriate. <p>Council requests the transport route to be upgraded (at a minimum) to allow a two truck width road to safely carry the traffic in all weather. This would also include sealing further sections that are currently inadequate in wet/dry times. The EIS suggested that a dilapidation survey be conducted on the road networks prior to construction. Council agrees that a dilapidation survey should be required. This survey should be the basis for determining the level of upgrades required for the transport route.</p> <p>The Proponent is requested to consult with Tamworth Regional Council as the local roads authority to determine the adequacy of existing roads, causeways and culverts following the completion of the dilapidation survey, to determine the full extent of works required prior to construction, during and post operation (at decommissioning stage).</p>	<p>bank. It should be noted that the majority of the banks of this waterway have no trees or shrubs at all. Heavy pruning of the acacia could be conducted as an alternative, but this is likely to be a relatively short-term solution.</p> <p>A Drivers Code of Conduct has been included as Appendix B of the Traffic Impact Assessment. Condition T10 of the EIS states that “All construction workers and truckdrivers will complete the “Driver’s Code of Conduct” as part of their site induction.”</p>

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	<p>It is acknowledged that an intersection upgrade will be undertaken at the Oxley Highway/ Babbinboon junction and the Proponent will be required to enter into a Works Authorisation Deed with the Roads and Maritime Services for those works to be designed and construction appropriately.</p> <p>Suggested Conditions</p> <ul style="list-style-type: none"> ➤ <i>A condition related to the requirement to prepare a “Driver’s Code of Conduct” shall be included.</i> ➤ <i>Hours of heavy vehicle movements to be restricted such that no movements occur during school bus periods (morning/afternoons).</i> ➤ <i>Prior to the commencement of construction of the project, the Proponent shall commission a suitably qualified expert to assess the condition of all Council controlled public roads proposed to be traversed by construction traffic associated with the project (including over-mass or over-dimensional vehicles) in consultation with Council.</i> ➤ <i>Prior to commencement of construction of the project, in consultation with Council and the RMS, the Proponent shall identify any upgrade requirements to accommodate project traffic for the duration of construction (including pavement, shoulder, swale, culvert, causeway, bridge and drainage design; intersection treatments; vehicle turning requirements and site access) considering final traffic volumes and works.</i> ➤ <i>The results shall be contained within a road dilapidation and upgrade report, and shall be submitted to the Secretary prior to the commencement of construction clearly identifying recommendations made by the Council and the RMS and how these have been addressed. The Proponent shall ensure that all upgrade measures identified in the report are implemented to the satisfaction of Council and the RMS, prior to the commencement of construction.</i> 	

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	<p><i>Advice Note: It is anticipated that the arrangements for ongoing maintenance and final repair of any defects and deterioration at completion of the construction phase of the project will be the subject of a security bond to be lodged with Council, and to be drawn upon in the event that the proponent fails to satisfactorily adhere to the terms of the Construction Management Plan.</i></p>	
Dust A4	<p>Dust mitigation surrounding the transport route being largely unsealed is to be addressed by two options within the EIS, being 1) dust suppression using water carts, or 2) sealing unsealed sections of the transport route on Babbinboon Rd & Warminster Rd. Whilst there are two options specified, there is no trigger identified for the adoption of either treatment measure. Council has concerns that the extended use of water carts will be impractical, and has a strong preference for sealing of the roadways in the vicinity of the dwellings. A condition should be placed around this so that it is clearly identified and not just left to the developer's discretion. As discussed above, the dilapidation survey will determine which sections of the transport route will be required to be sealed or upgraded. For those sections of the transport route that remain unsealed, the following condition is requested.</p> <p><i>Suggested Conditions</i></p> <ul style="list-style-type: none"> ➤ <i>The Developer shall upgrade and seal any unsealed sections of roadway along the designated haulage route with potential to cause a dust nuisance to adjoining dwellings and other sensitive uses, to the satisfaction of Tamworth Regional Council.</i> ➤ <i>The Developer shall ensure that dust suppression is undertaken to ensure there is no visible dust emitted due to any works associated with unsealed areas within the development, and any remaining unsealed</i> 	<p>At a meeting with Tamworth Regional Council on the 16th March, it was resolve that:</p> <ol style="list-style-type: none"> 1. Tamworth Solar Farm would seal sections of Babbinboon and Warminster Roads for a distance of 100m either side of houses near (within 250m) the road. This commitment does not preclude additional measures that may arise from the survey of the transport route with Tamworth Regional Council. 2. To require dust suppression such that there is no visible dust emitted is not practicable. Rather, the Applicant must minimise dust generated by the development.

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	<p><i>areas along the transport route. This can be in the form of constant water spraying or other natural based proprietary dust suppressant, to ensure that dust caused by any vehicles moving in, out or within the development site does not cause a nuisance to surrounding properties.</i></p>	
<p>Aboriginal Heritage A5</p>	<p>The following conditions are requested to be included in relation to the Aboriginal heritage on the site: <i>Suggested Conditions</i></p> <ul style="list-style-type: none"> ➤ <i>A representative from Tamworth Local Aboriginal Land Council shall be present onsite during initial vegetation clearing and topsoil stripping.</i> ➤ <i>If during the course of construction, the Proponent becomes aware of any previously unidentified significant Aboriginal object(s), all work likely to affect the object(s) shall cease immediately and the OEH informed in accordance with section 89A of the National Parks and Wildlife Act 1974. Relevant works shall not recommence until written authorisation from the Director-General of OEH advising otherwise is received by the Proponent.</i> 	<p>The management of Aboriginal heritage during the construction phase has been agreed with the Registered Aboriginal Parties (RAPs) including two members of the Tamworth Local Aboriginal Land Council. These measures are documented in the Cultural Heritage Management Plan (CHMP) attached as Appendix A. The CHMP was developed following an onsite workshop with the RAPs. The CHMP includes direction in the event of an unanticipated discovery of an Aboriginal object. Tamworth Solar Farm intends to manage Aboriginal heritage in accordance with the agreed CHMP.</p>
<p>Land A6</p>	<p>Conditions are recommended specifically identifying that the site is to be returned to its pre-development state should the Solar Farm be decommissioned. <i>Suggested Conditions</i></p> <ul style="list-style-type: none"> ➤ <i>Within 18 months of the site being decommissioned, the site shall be returned, as far as practicable, to its condition prior to the commencement of construction in consultation with relevant landowners. All solar panels and associated above ground structures including but not necessarily limited to, the substation, the control and facilities building and electrical infrastructure, including underground infrastructure to a depth of 300 millimetres, shall be removed from the site unless otherwise agreed by the Secretary, except where the substation, control room or overhead electricity lines are transferred to or in the control of the local</i> 	<p>In Section 3.8 of the EIS, Tamworth Solar Farm has made the following commitments:</p> <ul style="list-style-type: none"> • PD5 On decommissioning of the solar farm, all infrastructure will be removed including cables. • PD6 During decommissioning, wherever possible, the components of the solar farm will be reused or recycled. <p>Tamworth Solar Farm has committed to removing all underground infrastructure irrespective of depth.</p> <p>Tamworth Solar Farm anticipates that the Department of Planning, Industry and Environment will issue a standard condition relating to decommissioning and rehabilitation.</p>

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	<p><i>electricity network operator. All other elements associated with the project, including site roads, shall be removed unless otherwise agreed to by the Secretary.</i></p> <ul style="list-style-type: none"> ➤ <i>If the solar farm is not used for the generation of electricity for a continuous period of 12 months, it shall be considered decommissioned by the Proponent, and the site shall be returned as far as practical, to its condition prior to the commencement, unless otherwise agreed by the Secretary. The Proponent shall keep independently-verified annual records of the use of the solar panels for electricity generation. Copies of these records shall be provided to the Secretary upon request.</i> ➤ <i>No later than one month prior to the decommissioning of the project, or as otherwise agreed by the Secretary, the Proponent is to prepare a Decommissioning Management Plan for the approval of the Secretary. The Plan is to include but not necessarily limited to:</i> <ul style="list-style-type: none"> <i>(a) identification of structures to be removed and how they will be removed;</i> <i>(b) measures to reduce impacts on the environment and surrounding sensitive land uses;</i> <i>(c) details of components to be recycled;</i> <i>(d) details of rehabilitation and revegetation with reference to the biodiversity offset</i> 	<p>We do not agree with the proposed condition that the proponent shall keep independently verified annual records of the site's operation. Current information on the amount of energy produced by the solar farm will be publicly available on the Australian Energy Market Operator's (AEMO) website as with all other generators. There is no benefit in duplicating this data. If the DPIE requests the data, Tamworth Solar Farm agrees to download the data and send it to the DPIE or provide a link to the data.</p>
Visual A7	<p>Conditions around the reflectivity of the panel infrastructure should be included. Panels should be designed to be non-reflective. The following conditions are requested: <i>Suggested Conditions</i></p>	
A7a	<ul style="list-style-type: none"> ➤ <i>A further glare assessment is to be undertaken once the panel layout is confirmed, to ensure that the location, siting and angle of the panels on site, does not result in any unacceptable glare for sensitive receptors/adjoining properties.</i> 	<p>Tamworth Solar Farm does not agree that there is a requirement for a further glare assessment to be undertaken.</p>

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		<p>As discussed in Section 7.1.7 of the Landscape and Visual Impact Assessment, solar panels are designed to absorb the sun energy and directly convert it to electricity. Current PV modules absorb approximately 93.5% of the light received. The solar panels are designed using anti-reflective solar glass effectively reducing reflectivity. The reflectivity of solar panels is less than other typical land-uses in the area such as crops or pasture.</p> <p>An example of their benign nature in this regard is that large arrays of solar panels have been installed at major airports around the world. Darwin International Airport has recently installed a 4 MW system. Tamworth Regional Council is also looking to install solar panels on buildings at the Tamworth Airport.</p> <p>Another example is that Orange Grove Solar Farm near Gunnedah was recently required to conduct a glare assessment for sensitive receptors near the site. The results of the quantitative study showed that there would be no glare.</p>
A7b	<p><i>The developer must minimise the off-site visual impacts of the development, including the potential for any glare or reflection from the solar panels;</i></p>	<p>Tamworth Solar Farm has proposed a number of specific and measurable mitigation measures to address visual impact in Table 5.19 of the EIS. We do not see the benefit in including an additional condition that is not specific or measurable, particularly in relation to reflection from the panels which is likely to be less than from the surrounding landscape.</p>
A7c	<p><i>The developer must ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and</i></p>	<p>Tamworth Solar Farm has included the following commitment (V8) in the EIS which is similar to the proposed condition. "Consideration will be given to the material and colours of the PCU's, the battery, and storage</p>

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		shed to ensure minimal contrast and to help blend into the surrounding landscape. Where practicable, materials will be nonreflective and painted in neutral colours that are sensitive to the surrounding landscape.”
A7d	<i>The developer must not mount any advertising signs or logos on site, except where this is required for safety purposes.</i>	It was agreed with Tamworth Regional Council on the 16 th March that the project should be allowed a business identification sign at the gate stating that it is the Tamworth Solar Farm with relevant contact details and information. With the exception of this sign, Tamworth Solar Farm agrees to not have logos or advertising signs that are visible from the boundary.
Noise A8	<p>The EIS mentions neighbour notification and there is a mitigation measure proposed identifying that notification will be undertaken. Inclusion of a condition requiring a complaints line to be established and contact details for responsible person provided to affected neighbours. All complaints to be formally recorded and reported back to the complainant within 7 days. The following conditions are suggested:</p> <p><i>Suggested Conditions</i></p> <ul style="list-style-type: none"> ➤ <i>The Proponent shall only undertake construction activities associated with the project that would generate an audible noise at any sensitive receptor during the following hours: (a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive; (b) 8:00 am to 1:00 pm on Saturdays; and (c) at no time on Sundays or public holidays. This condition does not apply in the event of a direction from police or other relevant authority for safety reasons, to prevent environmental harm or risk to life.</i> ➤ <i>Prior to the commencement of construction, the Proponent shall ensure that the following are available for community complaints for the life of the project (including construction and operation) or as otherwise agreed by the Secretary: (a) a 24 hour telephone number on which complaints about construction and operational activities at the site may</i> 	Tamworth Solar Farm agrees with the condition relating to construction hours as it is the same as commitment N3 of the EIS. Tamworth Solar Farm is agreeable to the proposed conditions relating to complaint management.

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	<p><i>be registered; (b) a postal address to which written complaints may be sent; and (c) an email address to which electronic complaints may be transmitted.</i></p> <p><i>The telephone number, postal address and email address shall be advertised in a newspaper circulating in the area on at least one occasion prior to the commencement of construction; and at six-monthly intervals during construction and for a period of two years following commencement of operation of the project. These details shall also be provided on the Proponent's internet site. The telephone number, the postal address and the email address shall be displayed on a sign near the entrance to the construction site(s), in a position that is clearly visible to the public.</i></p> <p>➤ <i>The Proponent shall record details of all complaints received in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to: (a) the date and time, of the complaint; (b) the means by which the complaint was made (telephone, mail or email); (c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; (d) the nature of the complaint; (e) any action(s) taken by the Proponent in relation to the complaint, including timeframes for implementing the action; and (f) if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken.</i></p> <p>➤ <i>The Proponent shall provide an initial response to any complaints made in relation to the project during construction or operation within 48 hours of the complaint being made. The response and any subsequent action taken shall be recorded and subsequent detailed response or action is to be provided to the complainant within 7 days.</i></p> <p>➤ <i>The Complaints Register must be submitted to Tamworth Regional Council:</i></p>	

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	<ul style="list-style-type: none"> o Every 3 Months for the first 12 Months from the commencement of construction; and o Every 12 Months for the life of the development at the commencement of operations (post initial construction). 	
Flooding and Stormwater A9	<p>A portion of the panels are identified as being subject to minor inundation by floodwaters in the 1:100yr event. A general condition regarding the requirement for structures to be designed to withstand the effects of floodwaters should be included.</p> <p><i>Suggested Condition</i></p> <ul style="list-style-type: none"> ➤ To ensure that the development is structurally capable of withstanding the effects of flowing floodwaters including debris and buoyancy forces, detail drawings, a report and certification by a qualified practicing Consulting Engineer shall be submitted with the Construction Certificate to show that the structures will not, in the opinion of the Consulting Engineer, sustain unacceptable damage from the impact of floodwaters and debris associated with the 1 in 100 year flood. 	<p>One of the outcomes of the flood study conducted by WMA Water was a recommendation that posts for the solar panels be excluded from the area defined as floodway in a 1% Annual Exceedance Probability flood. This was done due to a low risk of soil scouring at the base of the post, not because there was any risk of structural damage to the infrastructure or that a post may be washed out. It was considered that there was no need to exclude the posts from the area defined as Flood Storage or Flood Fringe as these areas have low flow velocities. Furthermore, the catchment of the streams flowing through the site is largely within the site plus a relatively small area on the neighbouring property to the west. There are very few trees within the catchment and the risk of having any significant debris in floodwater is low. Any debris (likely to be small in nature) will be travelling in the floodway where there are no posts. This rationale was discussed with the Tamworth Regional Council on the 16th March and no objection was raised.</p>
Hazards and Risks A10	<p>Minor exposure to EMF for staff is identified. Although potential impacts of this are deemed minimal, perhaps a general condition regarding WH&S and staff education around safe operating procedures is required in this regard?</p> <p><i>Suggested Condition</i></p> <ul style="list-style-type: none"> ➤ The Proponent shall: <ul style="list-style-type: none"> o Store and handle all dangerous or hazardous materials on site in 	<p>Tamworth Solar Farm agrees with these conditions as they reflect commitment H4 of the EIS.</p>

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	<p>accordance with AS1940-2004: The storage and handling of flammable and combustible liquids, or its latest version; and</p> <ul style="list-style-type: none"> o Minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur. 	
Management Plans A11	<p>The EIS mentions preparation and implementation of Operational Management Plan, Waste Management Plan, etc. Any condition of consent applicable to a Management Plan must include specific details required to be included within such plans and who they are required to be submitted to for approval prior to implementation.</p>	<p>Tamworth Solar Farm anticipates that while the Department of Planning, Industry and Environment will issue standard conditions requiring that some plans are developed in consultation with Council, all management plans will be developed to the satisfaction of the Secretary.</p>
Development Contributions & Voluntary Planning Agreement (VPA) A12	<p>If the Proponent intends to enter into a VPA in relation to a community fund, there should be further discussion between Council, the Proponent and the Department prior to determination of the application. The VPA must take into consideration all neighbouring properties and nearby communities.</p> <p>The proposed development is subject to the Tamworth Regional Council Section 94A (Indirect) Development Contributions Plan 2013, and therefore the following condition is to be included. It is noted that the total estimated cost of development is not identified by Council in the submitted documentation. The S7.11 Contribution would be 1% of the total cost of development.</p> <p><i>Suggested Condition</i></p> <ul style="list-style-type: none"> ➤ In accordance with Section 4.17 of the Environmental Planning and Assessment Act 1979 and the Tamworth Regional Council Section 7.12 Development Contributions Plan 2013, \$XXXXX (1% total cost of development) shall be paid to Council to cater for the increased demand for community infrastructure resulting from the development: <p><i>If the contributions are not paid within the financial year that this consent is granted, the contributions payable will be adjusted in accordance with the provisions of the Development Contributions Plan</i></p>	<p>Tamworth Solar Farm does not consider it should be required to pay Development Contributions to the Tamworth Regional Council. The project would not create an increase in demand for community infrastructure.</p> <p>With regard to road infrastructure, Tamworth Solar Farm has committed to upgrading Babbinboon Road and Warminster Road, and with the Tamworth Regional Council, will complete a survey of the transport route from the Oxley Highway to the site to determine what works need to be conducted to ensure that the route is safe and fit for purpose for construction traffic and residents including the passing of heavy vehicles. If any further upgrade requirements are identified following this survey, Tamworth Solar Farm will cover these costs.</p> <p>With regard to utilities services, Tamworth Solar Farm will not require development or augmentation of any water supply or water treatment infrastructure for the construction or operational phases of the project. Tamworth Solar Farm will be covering the cost of electrical</p>

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	<p>and the amount payable will be calculated on the basis of the contribution rates applicable at the time of payment in the following manner:</p> $\$C_{PY} = \frac{\$C_{DC} \times CPI_{PY}}{CPI_{DC}}$ <p>Where:</p> <p>\$C_{PY} Is the amount of the contribution at the date of Payment</p> <p>\$C_{DC} Is the amount of the contribution as set out in this development consent</p> <p>CPI_{PY} Is the latest release of the Consumer Price Index (Sydney - All Groups) for the financial year at the date of Payment as published by the ABS</p> <p>CPI_{DC} Is the Consumer Price Index (Sydney - All Groups) for the financial year at the date of this development consent</p> <p>The monetary contributions shall be paid to Council prior to the issue of the first Construction Certificate.</p> <p>It is the professional responsibility of the Principal Certifying Authority to ensure that the monetary contributions have been paid to Council in accordance with the above timeframes.</p>	<p>upgrades and waste treatment.</p> <p>While Tamworth Solar Farm does not intend to enter into a VPA, an ongoing community benefit sharing program will be developed. Tamworth Solar Farm Pty Ltd will work with the local community to identify community projects that the company can support. This ongoing community support is in addition to the 6kW solar system that has been offered to those landholders whose house is within 2 km of the Site and have a view to the development from the house or the house yard.</p>

Transport for NSW

Subject	Agency Comment	Tamworth Solar Farm Response
B1	<p>TfNSW technical assessment of the EIS, specifically the TIA, considers that the 'baseline' for traffic impact assessment has not been adequately identified and consequently the predictions of development impacts on the road network are not robust or comprehensive. Our letter of 1 May 2018 advised the relevant considerations to inform the EIS and the TIA does not adequately address the relevant aspects of the applicable guidelines.</p> <p>TfNSW has reviewed the referred information and recommends that the Consent Authority request additional information to further address the following issues prior to making a determination;</p>	<p>A meeting was held with TfNSW on the 12 March to discuss the agency's comments. Sean Morgan who is the author of the Traffic Impact Assessment (TIA) explained that traffic levels on the transport route from the Oxley Hwy to the site were less than 10 vehicles per hour from observations that were made during field assessments. Due to the very low numbers of vehicles, Mr Morgan felt that there was no need to install traffic meters on the roads. There is very little through traffic on Warminster Rd in particular. This is because residents on Soldier Settlement Rd and Prices Rd all use Soldier Settlement</p>

Subject	Agency Comment	Tamworth Solar Farm Response
		Rd to travel to Tamworth which is the closest service centre. Residents only use Warminster Rd if they wish to travel to Somerton or Gunnedah.
B2	Clearly identify the proposed transport route from the Oxley Highway to the development site and any alternate secondary routes to be used by the development.	<p>A revised version of the TIA (Version 4.0) is attached as Appendix B to this report. It contains an additional figure (Figure 2-1) to provide clarity on the designated access route between the site and the Oxley Highway. No alternative access route is proposed due to physical road constraints for heavy vehicles. Once on the Oxley Highway, all trucks will remain on the Regional and State Road network to access Newcastle Port or Sydney for solar panels etc. The state and regional road network provide safe and acceptable routes for trucks through the towns located along the haul routes for trucks to and from the site during construction.</p> <p>Further information has been provided in Section 2.2 of the TIA Ver 4.</p>
B3	Identify the existing traffic conditions on the affected transport route/s, being informed by recent traffic count data. The count data should be used to inform forecasted traffic conditions for each phase of the proposed development.	<p>Section 2.1 of the revised TIA provides guidance on traffic volumes on the Oxley Highway from the TfNSW web page. Traffic flows on the local roads used to access the site have been observed during site work and are less than 10 vehicles per hour on these roads. These roads do not provide any through demands for traffic and are only used for access to rural farm holdings.</p> <p>The projected traffic numbers for the construction element of the project has provided details on daily inbound and outbound light and heavy vehicles. Given the minimal existing flows, the vehicles associated with the construction will form the majority of the traffic on the local roads between the subject site and the Oxley Highway.</p>

Subject	Agency Comment	Tamworth Solar Farm Response
B4	Identify the maximum daily and peak hourly vehicle movements generated by each phase of the development along the proposed transport route/s.	<p>Section 3.3 of the TIA identifies the staff numbers and hence the vehicle numbers during the construction phase of the project. Up to 70 inbound light vehicles are expected in the morning to commence work on site at 7.00 am and these vehicles then remain on site. A similar number of light vehicles will depart the site at the end of the work day (6.00 pm).</p> <p>Section 3.5 of the TIA provides a summary of the total number of heavy vehicles proposed during construction and provides for 20 inbound and 20 outbound trucks per day (giving less than 5 per hour on the designated haul route). The 20 inbound and outbound truck movements per day is the maximum and will be less than this during the initial start of the project as well as tail off towards the end of the construction phase of the project.</p> <p>Once the solar farm is operational, the traffic flows are minor. There will be 2 staff members travelling to and from the site each working day (refer section 4.1).</p> <p>Project traffic will only use the identified access route between the site and the Oxley Highway as shown in Figure 2-1 and 2-2 of the TIA.</p>
B5	Identify projected traffic conditions for opening year and over a 10 year horizon to enable consideration of construction and operational impacts along the transport route/s, particularly at key intersections.	<p>The construction activity will take approximately 12 months for completion and therefore will have no impact after the first year. Traffic growth in the area is minimal. TfNSW count station I.D. 6194 shows 1.1% growth recently and other surrounding count stations have similar or lower growth patterns. The impact during the operational phase of the solar farm of 2 staff cars on the access route and nearby intersections is negligible. For further information, refer to Section 4.1 of the TIA.</p>

Subject	Agency Comment	Tamworth Solar Farm Response
B6	<p>Identify trip distribution including total two-way traffic volumes along the identified transport route/s, directional movements at key intersections and the proportion of heavy vehicles using the route. The mapping demonstrated in Figures 2-1 and 4-1 of the TIA identifies only identify the distribution of development related trips.</p>	<p>In the morning peak there will be up to 70 light vehicles inbound to the site via the designated route, being left into Babbinboon Road off the Oxley Highway. There will be no vehicles outbound in the mornign peak.</p> <p>During the day there will be a maximum of 20 inbound trucks and 20 outbound trucks using the designated route. These will be left turn onto Babbinboon Road for inbound then right turn out of Babbinboon Road for the outbound movement.</p> <p>In the afternoon peak, there will be 70 light vehicles exiting the site and turning right onto the Oxley Highway from Babbinboon Road. Based on site observations and no through traffic demands it is considered that there will be little if any other traffic on these transport routes at these times.</p>
B7	<p>Identify whether the existing intersections along the identified transport route meet the minimum Austroads turn treatments. The forecasted traffic demands should be used to inform an assessment against the turn warrants provided under Austroads Guide to Traffic Management Part 6 and Austroads Guide to Road Design Part 4A. All intersection improvements proposed to accommodate the proposed development should be identified in the EIS.</p> <p>It is noted the TIA proposes an Austroads auxiliary left-turn (AUL) treatment to accommodate development traffic turning from the Oxley Highway into Babbinboon Road. Further consideration should be given to the likelihood of any vehicle turning right from the Oxley Highway at this intersection and it is recommended that measures are identified to address the risk arising to any vehicle turning from the travel lane of the highway.</p>	<p>The assessment identified that the intersection of the Oxley Highway and Babbinboon Road will need to be upgraded to allow for a AUL (S) for the increased left turn demand during construction. Once constructed the traffic demands are negligible and the upgrade will have adequate capacity. Refer to Section 2.2.1 of the TIA Ver 4 for more information.</p> <p>No heavy vehicles will be required to access the site from Gunnedah, with all supplies and specialist equipment to be provided from Tamworth or Newcastle Port. The majority of staff will also be based in Tamworth and hence will not turn right into Babbinboon Road.</p> <p>All other intersections on the State and Regional road network will have adequate capacity to cater for the construction traffic and currently carry B-doubles and large heavy vehicles associated with freight and rural demands.</p>

Subject	Agency Comment	Tamworth Solar Farm Response
		The impact of the construction traffic on the local un-sealed roads providing access to the site will be discussed in detail with Council (the road authority) and a management plan agreed prior to commencing construction work on site.
B8	Identify the required sight distances for the posted speed limit/s at each intersection, any existing constraint to available sight distances and measures to address any identified deficiency.	Section 2.2.1 of the TIA (Version 4) identifies the sight distance for the key intersection of the Oxley Highway and Babbinboon Road at being over 500 metres. Sight issues have been identified at the intersection of Babbinboon Road and Warminster Road and the removal or trimming of one acacia will be conducted. All other intersections on the local roads have adequate sight distance.
B9	It is recommended that the Consent Authority obtain strategic designs demonstrating the scope of all works proposed on public roads and have consideration for any associated environmental impacts.	A design for the deceleration lane has been provided as Appendix D of the TIA Vers4. All other works will be within the footprint of the existing roads and will primarily involve improving the surface of those roads and improving drainage where required.
B10	Details of proposed site access, parking, manoeuvring and servicing areas, including swept paths for the largest vehicle entering and leave the site in a forward direction.	Site access is via the existing access to the property which accommodates large vehicles associated with farming activities on the site. This access will be upgraded as part of the construction work. Just inside the site entrance, on the solar farm site, there is a temporary laydown area that will be 180m by 60m. Trucks will be able to turn around on this area which will enable all heavy vehicles to enter and exit the site in a forward direction.
B11	Details of the outcome of consultation with the relevant bus service providers and further consideration for the impact of development traffic on existing school bus routes.	The designated route between the site and the Oxley Highway does not form part of a school bus route.
B12	Details of the design vehicles proposed to delivery materials to the site and confirmation they can be safely accommodated on the identified transport route.	Section 3.5 of the TIA provides a table of design vehicles to be used during construction. The largest vehicle is a semi-trailer (with no B-double use) and these can be accommodated on the local roads in a similar manner to

Subject	Agency Comment	Tamworth Solar Farm Response
		the existing rural demands in this location which require semi-trailers for carting of stock, grain and supplies.
B13	The Consent Authority should be satisfied that the proposed measures to mitigate the impact of road noise and dust have addressed all relevant receivers.	The impact of road noise on residents along the road has been assessed and is documented in Section 5.6 of the EIS and Appendix G of the EIS. Mitigation measures for the management of dust are discussed in Section 5.7.4.1. Further measures to manage dust are provided in response to Comment A4 of this report.
B14	The Consent Authority should be satisfied that the EIS has addressed the potential impact of reflectance or glare from onsite infrastructure to any public roads over the life of the project.	The impact of reflectance is addressed in Section 5.5.3.5 of the EIS. Any possible glare from public roads will also be limited by the visual screens that surround the solar farm.
B15	TfNSW recommends that the Construction Traffic Management Plan and Driver Code of Conduct provided under Appendices A and B of the TIA be included as a requirement of any project approval. The documents should be further expanded and approved by the Consent Authority prior to the commencement of the construction phase. TfNSW can provide further input to inform these documents once the abovementioned issues have been further addressed.	The Construction Traffic Management Plan (CTMP) and Driver Code of Conduct will be included in the documents for tender etc and will be constantly reviewed and updated throughout the construction phase of the project, with consultation with the staff on site and local residents as required. Updates to the CTMP and Driver Code of Conduct will be notified at Toolbox meetings throughout the construction phase of the project.
B16	TfNSW highlights that in determining the application under the Environmental Planning and Assessment Act, 1979, it is the Consent Authority's responsibility to consider the environmental impacts of any road works which are ancillary to the development. This includes any works which form part of the proposal and/or any works which are deemed necessary to include as requirements in the conditions of development consent.	With the exception of the deceleration lane on the Oxley Hwy and the removal or trimming of the acacia, there will be no other works conducted outside the footprint of the existing road.
B17	All works on classified (State) road are to be designed and constructed in accordance with Austroads Guidelines, Australian Standards and TfNSW Supplements. Any road works deemed necessary by the Consent Authority on a classified (State) road will require the consent of TfNSW and consent is provided under the terms of a Works Authorisation Deed (WAD). The Developer will be required to enter into the WAD with TfNSW and	A concept design plan based on aerial photography has been prepared of the project. This will form the basis of the commencement of the WAD process and will require detailed design to be completed based on a ground survey which will be completed as part of the WAD process.

Subject	Agency Comment	Tamworth Solar Farm Response
	<p>complete all works to satisfaction of TfNSW prior to the commencement of the construction phase of the development. The developer will be responsible for all costs associated with the works and administration for the WAD. It is recommended that developers familiarise themselves with the requirements of the WAD process. Further information can be accessed at: https://www.rms.nsw.gov.au/documents/projects/factsheet-development-process.pdf</p>	

Biodiversity and Conservation Division

Subject	Agency Comment	Tamworth Solar Farm Response
C1	<p>Table 2.6 of the BDAR lists recommended mitigation measures. BCD supports these mitigation measures. However, these are not included in the summary of mitigation measures for biodiversity presented in table 5.3 of the EIS. The EIS states that vegetation screening will use fast growing species that are drought tolerant, fire resistant and grow to a height of 5 to 10 metres, and are preferably native species (section 5.5.4.2). Consistent with the recommended mitigation measure in table 2.6 of the BDAR, BCD recommends that landscaping and vegetation screening should use plant species commensurate with the plant community type (PCT) identified on the site.</p> <p>Recommendations</p> <p>2.1 The mitigation measures in table 2.6 of the BDAR should be included with those presented in table 5.3 of the EIS.</p> <p>2.2 Planted vegetation should use species commensurate with PCT 433 – White Box grassy woodland to open woodland on basalt flats and rises in the Liverpool Plains sub-region, Brigalow Belt South Bioregion.</p>	<p>In relation to Recommendation 2.1, Tamworth Solar Farm agrees to implement the measures in Table 2.6 of the BDAR. However, we would like to provide some clarification regarding the last point of the tables which reads as follows “Minor landscaping around drains, embankments and paths may be required. Where this occurs, all species planted for any purpose should be consistent with those Plant Community Types described in this report or otherwise appropriate to the region or existing vegetation.” This requirement can be met in those areas that will not be grazed by sheep, for example, the vegetation screens. However, much of the property is intended to be a productive sheep grazing enterprise in addition to being a solar farm. In these areas, it is intended that any sowing will be with improved pasture species. In our consultations with local landholders, maintaining the land as productive agricultural land was a key issue for many.</p> <p>In relation to Recommendation 2.2, Tamworth Solar Farm agrees to comply with the recommendation, however, one of the consequences is that the visual screens are likely to establish more slowly.</p>

Fire and Rescue NSW

Subject	Agency Comment	Tamworth Solar Farm Response
D1	<p>I refer to the submission of the request for agency input into development of Environmental Impact Statement (EIS), dated 23 January 2020, for the above development to Fire & Rescue NSW (FRNSW). The relevant parts of the proponent's EIS have been reviewed and the following comments are submitted for consideration.</p> <p>Large scale solar farm developments are usually located within NSW Rural Fire Services' (RFS) fire districts. Notwithstanding, in the event of either a significant fire event or hazardous material incident (hazmat), FRNSW will be responded to either assist the RFS or to fulfill the role of the designated hazmat combat agency.</p> <p>It is FRNSW experience that large-scale photovoltaic installations and associated battery energy storage solutions (BESS) present unique hazards and risks to our personnel when fulfilling their emergency duties. It is highlighted that the Fire and Rescue NSW Act 1989 (the Act) imposes specific statutory functions and duties upon the Commissioner of FRNSW. Clause 5A of the Act requires the Commissioner to take all practicable measures for preventing and extinguishing fires and protecting and saving life and property within a FRNSW fire district. Clause 5A of the Act also requires the Commissioner to protect and save life and property endangered by hazmat incidents and for confining a hazmat incident and for rendering the hazmat site safe.</p> <p>In addition, the Work Health and Safety (WHS) Act 2011 (and its subordinate Regulation) classify FRNSW as a person (entity) conducting a business or undertaking (PCBU). Clauses 34 and 35 of the WHS Regulation impose specific obligations upon a PCBU to identify hazards and manage risks at workplaces. A site involved in fire or hazmat incident is deemed to be a FRNSW place of work.</p> <p>Due to the electrical and fire hazards associated with large scale</p>	<p>Tamworth Solar Farm agrees with these requirements and the majority are covered in Commitment F9 of the EIS.</p>

Subject	Agency Comment	Tamworth Solar Farm Response
	<p>photovoltaic installations and the potential risk to the health and safety of firefighters, both FRNSW and the NSW Rural Fire Service must be able to implement effective and appropriate risk control measures when managing an emergency incident at the proposed site.</p> <p>In the event of a fire or hazardous material incident, it is important that first responders have ready access to information which enables effective hazard control measures to be quickly implemented. Without limiting the scope of the emergency response plan (ERP) requirements of Clause 43 of the Work Health and Safety Regulation 2011 (the Regulation), the following matters are recommended to be addressed:</p> <ol style="list-style-type: none"> 1. That a comprehensive ERP is developed for the site. 2. That the ERP specifically addresses foreseeable on-site and off-site fire events and other emergency incidents (such as fires involving solar panel arrays, battery energy storage systems, bushfires in the immediate vicinity) or potential hazmat incidents. 3. That the ERP details the appropriate risk control measures that would need to be implemented to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards). <p>Such measures will include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures to be instigated, minimum evacuation zone distances and a safe method of shutting down and isolating the photovoltaic system (either in its entirety or partially, as determined by risk assessment).</p> <ol style="list-style-type: none"> 4. Other risk control measures that may need to be implemented in a fire emergency (due to any unique hazards specific to the site) should also be included in the ERP. 	

Subject	Agency Comment	Tamworth Solar Farm Response
	5. That two copies of the ERP (detailed in recommendation 1 above) be stored in a prominent 'Emergency Information Cabinet' located in a position directly adjacent to the site's main entry point/s.	
D2	6. Once constructed and prior to operation, that the operator of the facility contacts the relevant local emergency management committee (LEMC). The LEMC is a committee established by Section 28 of the State Emergency and Rescue Management Act 1989. LEMCs are required to be established so that emergency services organisations and other government and non-government agencies can proactively develop comprehensive inter agency local emergency procedures for significant hazardous sites within their local government area. The contact details of members of the LEMC can be obtained from the relevant local council.	This comment is satisfied by Commitment F10 of the EIS.
D3	7. As a Condition of Consent that a Fire Safety Study (FSS) be prepared for the BESS part of the site and submitted to FRNSW for review and determination. The FSS should be developed in consultation with and to the satisfaction of FRNSW including the proposed fire detection and suppression system.	Tamworth Solar Farm anticipates that DPIE will issue a standard requirement in relation to a Fire Safety Study for the BESS

NSW Rural Fire Service

Subject	Agency Comment	Tamworth Solar Farm Response
E1	A Fire Management Plan (FMP) shall be prepared in consultation with NSW RFS Tamworth Fire Control Centre. The FMP shall include: <ul style="list-style-type: none"> • 24 hour emergency contact details including alternative telephone contact; • Site infrastructure plan; • Fire fighting water supply plan; • Site access and internal road plan; • Construction of Asset Protection Zones (APZ) and their continued maintenance; 	The requirements listed here will be covered in either the Emergency Response Plan (Commitment F9) and/or the Bushfire Management Plan (Commitment F13).

Subject	Agency Comment	Tamworth Solar Farm Response
	<ul style="list-style-type: none"> • Location of hazards (Physical, Chemical and Electrical) that will impact on fire fighting operations and procedures to manage identified hazards during fire fighting operations • Such additional matters as required by the NSW RFS District Office (FMP review and updates). 	
E2	The entire solar array development footprint to be managed as an Asset Protection Zone as outlined within section 4.1.3 and Appendix 5 of 'Planning for Bush Fire Protection 2006' and the NSW Rural Fire Service's document 'Standards for Asset Protection Zones'.	Tamworth Solar Farm agrees that fuel loads need to be kept low within the solar panel arrays. Figure 3.5 of the EIS demonstrates that there will be no trees or shrubs within the arrays, only pasture. Tamworth Solar Farm also made the following commitment (F4) in the EIS. <i>“During the bushfires season, pastures within the Development Site (including under panels) will be maintained with minimal fuel load (<100 mm grass height). Overgrazing will be avoided to maintain the groundcover and reduce the potential for erosion.”</i> We feel that this commitment adequately manages the fuel load during the bushfire season while providing the grazing operations some flexibility in their pasture management over the winter months. It is also clear and concise as opposed to referring to lengthy documents that will need to be interpreted.
E3	A 20,000 litre water supply (tank) fitted with a 65mm storz fitting shall be located adjoining the internal property access road within the required APZ.	Please refer to Commitment F12 of the EIS.
E4	To allow for emergency service personnel to undertake property protection activities, a 10 metre defendable space (APZ) that permits unobstructed vehicle access is to be provided around the perimeter of each of the solar array development sites including associate infrastructure.	Commitment F1 of the EIS states that: <i>“An APZ will be established around the perimeter of all PV panels and accompanying structures. The APZ will be at least 20m wide and will include a mineral earth perimeter Category 1 fire trail (trafficable 4m width with passing bays every 250 metres) maintained in accordance with NSW RFS fire trail standards (NSWRFS 2019). The remainder of the APZ will be grass that is kept at a height of less than 100 mm. Leaf material and other debris including woodchips will be removed. The APZ will be established at the start of the</i>

Subject	Agency Comment	Tamworth Solar Farm Response
		<i>construction and maintained until the solar farm has been completely decommissioned."</i>

Water Group

Subject	Agency Comment	Tamworth Solar Farm Response
F1	<p>Post Approval</p> <ul style="list-style-type: none"> The proponent must obtain relevant approvals and licences under the Water Management Act 2000 before commencing any works which intercept or extract groundwater or surface water (including from on-site dams where necessary) or for any works which have the potential to alter the flow of floodwaters. 	Noted
F2	<ul style="list-style-type: none"> The proponent should ensure watercourse crossings and riparian buffers are designed in accordance with the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018). 	Noted
F3	<ul style="list-style-type: none"> The proponent should prepare a CEMP and an OEMP and ensure sediment and erosion control is managed in accordance with the guideline; Managing Urban Stormwater: Soils and Construction (Landcom 2004). 	Tamworth Solar Farm agrees with this comment. These plans were addressed in Section 5.9.4.2.

Other Agencies

Agency	Agency Comment	Tamworth Solar Farm Response
Crown Lands	<p>DPIE Crown Lands have reviewed the information provided and can confirm that all of the roads referred to are under the care, control and management of Tamworth Regional Council as the roads authority. None of the subject roads are Crown roads. Portions of Warminster Road, Soldier Settlement Road and Prices Road that were dedicated as Crown roads were transferred to the authority of Tamworth Regional Council in February 2012 as per the attached notice from the NSW Government Gazette. No further comment</p>	Noted

Agency	Agency Comment	Tamworth Solar Farm Response
Heritage Council of NSW	The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological deposits. Therefore, no heritage comments are required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.	Noted
NSW EPA	The EPA has briefly reviewed the proposal presented in the document titled, 'Tamworth Solar Farm – Environmental Impact Statement – Volume 1' (January 2020). Based on the information provided, the proposed development is not a scheduled activity under the Protection of the Environment Operations Act 1997 ('the Act') and does not require an Environment Protection Licence (EPL). As such, the EPA has not provided any recommended conditions of approval for this proposal. Tamworth Regional Council will be the appropriate regulatory authority for the purposes of the Act, should consent be granted.	Noted
DPI Agriculture	DPI Agriculture, commends Oriens Energy on their commitment to completely removal of all solar farm components (above and below ground infrastructure) and the complete rehabilitation and return to agricultural use. DPI Agriculture advises that this commitment should be captured as a condition of consent.	Noted
Water NSW	Thank you for allowing WaterNSW the opportunity to comment on SSD-9264. The proposal is not located near any WaterNSW land, assets or infrastructure, therefore we have no particular comments or requirements regarding the proposal.	Noted
Division of Resources and Geoscience	DRG have reviewed the documentation for the above EIS and confirmed that issues raised at the SEARs stage have been addressed. The Division has no concerns with the Environmental Impact Statement for the Tamworth Solar Project.	Noted

Public Submissions

Name	Comments	Tamworth Solar Farm Response
Melinda Richards	<p>As a resident of Tamworth Regional Council's area I support this solar farm project. However as a resident of Babbinboon Rd I have major concerns regarding the high volume of traffic on a small local road. The proposal allows for a turning lane at the junction of Babbinboon Rd and the Oxley Highway which is essential for traffic to safely turn and pass the traffic on this busy road. This is particularly important between the hours of 5am- 9am and 3-7pm when most residents leave or return home. As rural land holders many of us leave for work early and arrive home late.</p> <p>Babbinboon Road will have up to 2800 vehicle movements over the construction phase. For the health, safety and wellbeing of the residents the road needs to be sealed. Section 2.2.4 of Appendix H Traffic Impact Assessment discusses two options. I am advocating for the second option which is to seal the length of the road from the Oxley Highway to the solar farm site. This will not only ensure the residents are supportive of this project and its traffic impact on their lives, but will also save the company money in the long run. By sealing the road in the initial stages, they will not lose time or money when the weather is inclement. The road becomes slippery and at times corrugated to the point of impassable, when the road either dries out or becomes muddy. The proposal to only seal sections of the road whilst watering the gravel sections to minimise dust is incomprehensible in this time of drought and with the limited water currently available to our town. The community backlash at this waste will be large.</p> <p>Further more the dust that will be created by 2800 traffic movements will be environmentally detrimental to the health of the residents. Not only do many children along this road suffer from asthma, but the constant dust invading our houses will ensure that the mental health of residents will be affected. This can be attested to recently with the dust storms that have hit our homes and the constant need to clean and try to remove the dust from our clothes, furniture and air. Having to do this every day with a 20/70 or 70/20 traffic movement is reprehensible.</p>	<p>Tamworth Solar Farm appreciates your general support for the solar farm and your concerns in relation to the transport route. At a recent meeting with the Tamworth Regional Council, it has been resolved to seal the road for 100m either side of each residence along Babbinboon Rd in addition to sealing the bends and intersections. This will reduce dust levels during construction and provide ongoing protection from dust that does not exist at the current time. Tamworth Solar Farm understands that the area is currently in drought and that is why the EIS gave an alternative dust mitigation measure to using water carts. Construction will not commence until late 2020 at the earliest. If at this time, water is still in limited supply, the dust control measures will need to be reviewed to ensure that dust is minimized along the transport route.</p>

	I implore the company to seal the road to ensure they save themselves time, money and community support for this project.	
Phillip Enderby	I support this green project.	Tamworth Solar Farm appreciates your positive submission.
Robert Collie	<p>I refer to the application for a Tamworth Solar Farm, State Significant Development (SSD) 9264 proposed for the property “Bonnie Brae”, adjacent Prices and Warminster Roads, Bective.</p> <p>As a property owner on Babbinboon Rd we have concerns with the amount of traffic that will be using Babbinboon rd for the construction of Tamworth Solar Farm, State Significant Development (SSD) 9264. We are concerned for the health and safety of our family and neighbours if the proposal goes ahead without the following issues being addressed.</p> <ol style="list-style-type: none"> 1. Babbinboon Rd may seem like the most cost effective solution for the above project but in wet times it will be impassable for heavy vehicles and dry times it will break away and it will be filled with dangerous corrugates and pot holes. 2. We have a high concern as we are only 25 meters off the road with dust affecting our property we have small children and would like to know if a dust study has been done? With the proposed number of extra vehicles the dust will be considerably higher and will affect everything from our drinking water to my Childs allergies 3. We have four trips to the end of the rd a day for school busses and although the environmental statement suggests that the road is two lanes. The photos show that traffic drive in the centre of the road and locals slow right down and move right into the table drain to pass on coming vehicles. I dread the thought of an extra 20 heavy and close to 100 light vehicles a day travelling this road, these numbers will more then double the traffic that this road currently carries (as stated in the EIS) and was designed for. <p>I believe by sealing the affected roads it offers a way forward in dealing with the serious impacts on the public infrastructure and minimise the impact on our community. We hope the proponent understands the impact this will have on residents that travel and live on these affected roads.</p>	<p>At a meeting with Tamworth Regional Council on the 16th March, it was resolve that:</p> <ol style="list-style-type: none"> 1. Tamworth Solar Farm would seal sections of Babbinboon and Warminster Roads for a distance of 100m either side of houses near (within 250m) the road. This is in addition to sealing of the corners and intersections. There will also be management measures to minimise dust along the remaining sections of road, particularly where there are houses in the area. 2. A survey of the transport route from the Oxley Highway to the site would be conducted with Council to determine what works need to be conducted to ensure that the route is safe and fit for purpose for construction traffic and residents including the passing of heavy vehicles. <p>All people working on the project will be required to comply with the Driver’s Code of Conduct which is appended to the Traffic Impact Assessment. Traffic Control Plans will be put into place for the intersection of Babbinboon Rd and Warminster Rd and the site entrance.</p> <p>We believe that all these measures will resolve the issues of dust and safety on the transport route and provide a better road than currently exists.</p> <p>It should also be noted that the 70 light vehicles per day and 20 heavy vehicles are maximum numbers. Most of the light vehicles will be arriving at site just before 7am and leaving soon after 6pm.</p>

<p>Name Withheld, Bective</p>	<p>I refer to the application for the Tamworth Solar Farm as we are one of the adjoining landholders we have a few concerns We object to the proposed development as it is in a very intense farming valley with a lot of holdings and the visual impact it will have on the area and adjoining properties will be greatly affected and no numbers of trees will block the large numbers of panels. This area is prime agriculture land producing beef cattle fat lambs and crops (FOOD) and should not be wasted on such a development as they are not making any more prime land such as this. Another concern is the volume of water that will run off 200,000 solar panels on slopping ground will be damaging to properties and roads near by in storms and major rain events. Adjoining properties VALUES will have to be affected by the impact the solar farm will have who is going to compensate for value loss and who is going to buy a property next to a solar farm. Another concern is the vegetation grasses and the old gum trees that are going to be removed how come these developments can get approval to remove and destroy native vegetation when farmers can not do this. We think the solar farm will have a great impact on the roads in the area which will affect transporting of produce grain and livestock from the area so roads will have to be maintained and who is going to do that at a cost to whom. We wish you look at the proposal and think of the impact this solar farm will have on this area. We are not against such a solar farm in the right area which will not have a big impact on intense prime agriculture land. Farming is our livelihood like many around us.</p>	<p>Tamworth Solar Farm understands that solar farms are a new element in the rural landscape and that this can cause concern amongst some neighbouring residents. While there is concern about the productivity of the land, Tamworth Solar Farm intends to maintain the land as productive agricultural land in addition to establishing a solar farm. The land on which the solar farm is proposed to be developed is not classed as Biophysical Strategic Agricultural Land (BSAL). The majority of the land is Class 4 land with some Class 5. Class 4 land is classified as follows: Moderate to severe limitations. Land generally not capable of sustaining high impact land uses unless using specialized management practices with high level of knowledge, expertise, inputs, investment and technology. Limitations are more easily managed for lower impact land uses (e.g. grazing). Tamworth Solar Farm intends to have a neighbouring landholder run sheep on the property which is suitable enterprise based on the capability of the land.</p> <p>With respect to adjoining property values, there is no evidence that we are aware of that suggests that the values of neighbouring properties will be reduced as a result of the establishment of the solar farm. Furthermore, visual screens will be established that will help to screen the solar farm from neighbouring landholders. To provide effective screening, the location, heights and densities of these screens have been determined by specialist visual landscape consultants as part of the Landscape and Visual Impact Assessment.</p> <p>A flood study has been conducted as part of the EIS to look at what impact the development would have on flood levels during peak storm events. The study concluded that there would be no impact off site and negligible impact on</p>
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Name Withheld, Culcairn	I support this project to address ageing coal power stations and the finite coal resource. Renewable energy is the future and this project will addresses all levels of Governmental concern for the securing a better future for Australia.	Tamworth Solar Farm appreciates your support for the project and agrees that developing renewable energy sources will provide a more prosperous future for Australia.
Tamworth Parents and Friends for Climate Action	<p>We are a community climate activist group based in Tamworth NSW. Our goal is to advocate for urgent action to cut Australia’s carbon emissions to zero as fast as possible, and thus secure a safe and healthy environment for our children’s future. We are interested in any local projects or other endeavours which contribute to this goal.</p> <p>As such, we are fully supportive of the Tamworth Solar Farm project. We believe that our region is rich in renewable energy resources (solar and wind) and well-positioned to be a leader in this area. This makes sense from both environmental and economic perspectives. Per capita, Australia is one of the highest carbon emitters in the world. We must move quickly from outdated and damaging fossil fuel power to clean renewable energy, to meet our international obligations and set a strong example for less affluent and advantaged countries. Further, we are witnessing increased divestment in fossil fuel projects as awareness of the climate crisis grows and the efficiencies and other benefits of renewable technology become more widely known. The New England region has the opportunity to be “on the front foot” in embracing this global shift.</p> <p>We have read the provided Scoping Report and are satisfied that the proposed project will not have a negative impact on local biodiversity outweighing its environmental benefits. We also note that the construction phase of the project will bring employment opportunities to our region.</p> <p>In conclusion, we feel that the Tamworth Solar Farm project is a positive development for our region, and more broadly for our planet and children’s futures.</p>	Tamworth Solar Farm would like to thank Tamworth Parents and Friends for Climate Action for their support for the project and their endeavours to advocate for a low carbon future.