

4 July 2022

Department Planning, Industry and Environment

Attention: Kurtis Wathen

By Email: [kurtis.wathen@dpie.nsw.gov.au](mailto:kurtis.wathen@dpie.nsw.gov.au)

Dear Kurtis,

**Submission - SSD-13166280 Blind Creek Solar Farm - EIS Public Exhibition –  
Council Ref: PR.2022.1018**

Thank you for the opportunity to provide comments on the EIS for the Blind Creek Solar Farm Project at Bungendore. Council's comments are as follows.

***Appendix E - Visual Impact Assessment – Moir Landscape Architecture***

The assumed panel height of 5m is referenced on page 14. However, the plans do not provide a good representation of the proposed panel arrangement, section or layout. Further detail should be included in the EIS, including what the panel looks like in its various operational angles.

Visual impact has not considered the use of the land above the Weereewa Look out for hang gliding. Impact on hang gliding participants launching from this location and when gliding on the updraft of escarpment of Lake George should be considered (pages 15 and 26).

The Andersen VC rest area and the Weereewa Lookout have similar outlooks but the lookout is significantly higher. Therefore, it is unclear why the panorama for Weereewa suggests that no part of the site is likely to be visible when there are sections that are identified as visible from the Andersen VC rest area (page 26). This should be clarified.

Given the timeframe for the proposal, consideration should be given to the potential future impact on the areas identified in the Bungendore Structure Plan 2048 for future investigation for residential development on the northern side of Bungendore. [Bungendore Structure Plan 2018-2048 Link](#)

Much of the planting referenced on page 38 is located off site on land that is not in the control of the proponent or land holder. The EIS should describe how screen plantings on land outside the applicant's control will be facilitated.

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### **Appendix F – Reflective Glare Assessment - SLR**

The following points are raised in relation to this appendix.

- Residential nuisance glare section 6 (pages 31 – 41) should also reference the future residential areas of Bungendore as identified in the [Bungendore Structure Plan 2018-2048](#).
- The EIS should require confirmation that the panels in the facility will be operated in tracking mode (Pages 12, 17 and 41).
- Require confirmation that the airstrip will be decommissioned (Pages 3, 20-24 and 47).
- Require confirmation about the proposed night time lighting of the development (Pages 45 – 46).
- 24hr lighting of the development is not supported (Pages 5, 12, 45, 48).
- Require confirmation on whether 2P trackers will be used, noting that this will result in an up to 5m higher tilt (Pages 5, 12 and 49).

### **Appendix I – Hydrological and Hydraulic Analysis**

1. It is noted that flooding assessment of the site appears to be conducted in accordance with AR&R 2019. From our review, rainfall data and relevant assumptions appear to be generally consistent with what we would expect from industry.
2. It appears that the flood modelling of the site does not take into account the change in surface roughness coefficient due to earth disturbance during construction. However, it is noted that the subject site is on the foreshores of Lake George and consider that it is possible that the impact resulting from flooding during this stage of the project may be more of an environmental issue with scouring of the site and increased turbidity of receiving waters rather than increased flood affection of neighbouring properties. This consideration is due to relative size of the catchment (not the individual sub-catchments) as a whole and the project site being relatively small in comparison.
3. It is noted that generally the report recommends:
  - a. That infrastructure is located above the 1% AEP flood level with a suitable freeboard (excluding mounting poles and panel footings).
  - b. All buildings and structures are located outside of the H5 hazard areas. (H5 = Unsafe for vehicles and people. All buildings vulnerable to structural damage. Some less robust buildings subject to failure.)
  - c. Critical infrastructure be located 500mm above the PMF level.
4. It is noted all of the creeks located in the project site are classified as 4<sup>th</sup> order streams and will require an activity approval through DPI Water for any works or crossings affecting the waterways.

## **Appendix K – Traffic Impact Assessment**

1. Traffic volume data is taken from TfNSW traffic volume viewer from 2008 and a growth rate applied to calculate the volumes for 2021. It should be noted that a small error in adopted growth rate can have a significant cumulative impact over the course of a 13 year period. QPRC would expect that proposed State Significant Development would warrant on-site traffic counts to be commissioned for the acquisition of factual data and the removal of error and doubt from any calculations and/or assumptions. On this basis QPRC consider the traffic impact assessment to be fundamentally flawed.
2. Section 2.4 of the report asserts that there are no public transport services within the vicinity of the site. This statement does not account for school bus services.
3. Both average and peak VPD during construction comprise a significant percentage of the assumed traffic volume as calculated from assumptions in point 1 above:
  - a. 6.5% to 13.6% for light vehicles (assuming the same Light to Heavy split noted in Table 1).
  - b. 19.2% to 96% for heavy vehicles (assuming the same Light to Heavy split noted in Table 1).

The maximum peak of staff on-site for construction activities does not match the maximum peak in VPD attributed to the development. i.e. Peak staff rate of 300 and peak VPD of 170. The report contains no rationale to describe how modes of transport may achieve such a discrepancy between worker and vehicle numbers nor does it confirm whether the 300 staff noted include any of the HV drivers who would likely spend the majority of their day off-site.

4. The OSOM (Over-size / Over-mass) vehicle described in the swept path assessment appears to be a vehicle that will require a police escort as part of any approval to operate on the subject road network.
5. The traffic impact assessment is generally constrained to Tarago Road without sufficient consideration and assessment of the impact on other nearby roads.
6. The assessment does not address financial reparations for damage to the road caused by the increased construction traffic associated with the development.

## **Appendix M - Social and Economic**

Various parts of the EIS refer to a Community Benefit Sharing Scheme (CBSS) and a proposal to provide \$1.25M towards funding for a new community swimming pool (page 32, 33 and 318). The earlier references need to be rewritten to make it clear that the contribution to the swimming pool will be facilitated through a Planning Agreement with Council and that the \$1.25M is to be spent on recreational facilities including a swimming pool in Bungendore.

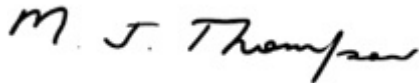
Other parts of the EIS refer to a meeting which occurred on 28/7/2021 not 28/7/2012 (page 106) as written. An addition should also be added to this sentence along the lines: *Since this time negotiations have continued between BCSF Pty Ltd and Council towards a planning agreement and the proponent made a presentation on the project to a Council workshop on 30 March 2022.*

It is recommended that with the recent release of the 2020 ABS Census data that Population and Growth (page 309-310), age, households and cultural diversity, socio-economic advantage and disadvantage and housing and accommodation (all page 312) be updated to reflect the latest available data.

The EIS suggests that there is adequate accommodation capacity within 67km of the development site (page 319). QPRC's experience is that the rental market is currently very tight particularly in Queanbeyan and that this type of project tends to drive up rentals locally, therefore adversely impacting on other potential renters. This section of the EIS needs to further consider these aspects of accommodation as should the Employment and Accommodation Strategy to be developed (pages 319, 325 and 326 – Item S3).

Once again thank you for the opportunity to comment.

Yours sincerely,

A handwritten signature in black ink that reads "M. J. Thompson". The signature is written in a cursive style with a clear, legible font.

**M J Thompson**  
**Portfolio General Manager**  
**Natural and Built Character**  
**Queanbeyan-Palerang Regional Council**