

Attn: Rita Hatem
Department of Planning, Housing and Infrastructure
Energy, Resources & Industry Assessments
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Hatem,

GAROO SOLAR FARM AND BATTERY ENERGY STORAGE SYSTEM (SSD-79747209) TAMWORTH REGIONAL COUNCIL - SUBMISSION RESPONDING TO ENVIRONMENTAL IMPACT STATEMENT (EIS)

Ref: jk/SL DocSet ID 3196455

Tamworth Regional Council (Council) thanks the Department for the opportunity to comment on the Environmental Impact Statement (EIS) for the proposed Garoo Solar Farm and Battery Energy Storage System (the Project). Council has reviewed the EIS and supporting technical material, together with its earlier submission made during the SEARs stage.

From the outset, Council is generally supportive of renewable energy development in principle and recognises the important role renewable generation and storage projects will play in the broader energy transition, energy reliability, decarbonisation and investment objectives. This is broadly consistent with Council's strategic planning framework.

At the same time, Council remains neutral on the Project itself, and this submission should not be interpreted as either an endorsement of, or objection to, the proposal as a whole. Council's role is to identify matters of local importance and ensure that impacts, obligations and opportunities relevant to the Tamworth region are properly considered.

Council's support for renewable energy development is not unconditional. Projects of this scale must be assessed not only on their strategic energy merits, but on how effectively they manage impacts on local communities, infrastructure, agricultural land, environmental values and long-term regional liveability. The key issue for Council is not whether renewable energy should occur, but how it occurs, where impacts fall, and whether those impacts are appropriately avoided, mitigated, funded and managed over the life of the Project.

Council's submission proceeds from four core principles:

- renewable energy development must not result in cost shifting to Council or the community;
- projects must be assessed through a cumulative impact lens;
- projects of this scale must deliver genuine local benefit and long-term legacy outcomes; and
- the region's agricultural base must be protected through credible agricultural coexistence and rehabilitation outcomes.

STRATEGIC CONTEXT AND CUMULATIVE IMPACTS

Council reiterates a key concern raised during the SEARs stage: cumulative impact assessment for the Project should not be limited to a narrow list of nearby projects but should consider the broader and evolving renewable energy context affecting the Tamworth region.

Tamworth is increasingly functioning as a regional service and impact centre for multiple renewable developments, including projects both inside and outside designated REZ areas. Council is concerned that local roads, accommodation markets, community services, agricultural landscapes and Council's own internal capacity may experience a cumulative burden that is not adequately captured when each project is assessed on a stand-alone basis.

Council acknowledges that the EIS includes cumulative traffic consideration and in some instances concludes cumulative impacts are minimal. However, traffic modelling demonstrating acceptable intersection performance does not resolve broader cumulative issues such as repeated heavy vehicle movements, rural road deterioration, school bus interactions, overlapping construction schedules, accommodation demand, or the cumulative social perception of large-scale renewable development across the local government area.

- Council therefore requests that the Department assess the Project in the context of broader regional development pressures and ensure that conditions of consent respond not merely to this Project in isolation, but to the cumulative realities already emerging across the region.

TRAFFIC, TRANSPORT AND ROAD INFRASTRUCTURE

Traffic and transport remain one of the principal areas of interest for Council.

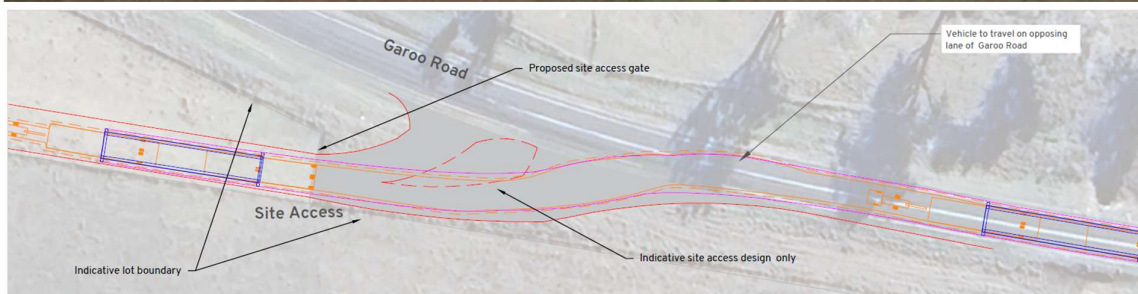
The Traffic Impact Assessment identifies that the Project's peak traffic-generating period will occur during construction and that, during peak construction, the Project could generate up to 108 light vehicles and 156 heavy vehicles per day. It also states that the Project could generate approximately 82 vehicles per hour during the morning and evening peak hours in the peak construction period, reducing to around 35 vehicles per hour during average construction periods.

The relevant local roads are Garoo Road and Lindsays Gap Road, both sealed and both connecting to the New England Highway via T-intersections, with Garoo Road identified as a B-double approved route. Existing intersections were assessed and generally found capable of accommodating Project traffic subject to treatments and traffic management measures. The EIS states that a Basic Right Turn and Basic Left Turn treatment would be required at the Garoo Road / site access intersection. Council notes that Lindsays Gap Road, Garoo Road and Bulls Road will likely require upgrade works to cater for anticipated Project traffic. Council also notes that one-way bridges and culverts are located on the nominated transport routes and may require upgrade works, the extent of which must be determined having regard to traffic volumes, vehicle types, swept path requirements and peak construction periods.

In addition, several bridges along the nominated transport routes are constructed to the T44 design vehicle standard, which effectively limits access to B-double configurations and is not suitable for larger Over Size Over Mass (OSOM) vehicles. Council also notes the presence of multiple large culverts near the New England Highway interface with Garoo Road and Lindsays Gap Road, the structural capacity of which is uncertain and may present equal or greater constraints than the identified bridges.

- Council recommends that the proponent undertake detailed structural assessments, including a Tier 3 assessment of all relevant structures, to confirm load capacity, identify constraints, and determine the feasibility of the proposed transport routes. All structures along the proposed haulage routes should be subject to certified engineering assessment, including confirmation of load capacity relative to anticipated OSOM axle configurations, and no OSOM movements should occur until any required upgrades or alternative routes are approved and implemented.

- Council remains concerned about the location and configuration of the proposed site access from Garoo Road. In particular, the access appears to be located on or near a curve, raising questions around available sight distance and the ability for vehicles to safely enter and exit the site without “straight-lining” movements across the carriageway.
- Council considers that the final design should demonstrate adequate safe stopping sight distance and confirm that vehicle turning paths can be accommodated safely and efficiently under peak construction traffic conditions.



- Council seeks further justification of the proposed Garoo Road site access intersection treatment. While a Basic Left Turn may be suitable where left-turn volumes are low, Council considers a Channelised Right Turn may be more appropriate if the access carries higher traffic volumes or the dominant turning movement during construction. The final treatment should be confirmed based on traffic volumes, turning movements, approach speeds, sight distance and overall road safety.

- More broadly, Council seeks confirmation of the suitability of the existing road network for the proposed traffic task, including sealed widths, pavement condition, overhead clearances, sight distances, and the appropriateness of the nominated route for heavy and Over Size Over Mass vehicles.
- Council also considers it essential that the ongoing maintenance of the route, particularly during the construction phase, be clearly addressed through enforceable management, monitoring and repair mechanisms.

Council notes that the TIA also records constraints in the local road environment, including single-lane bridge crossings on Garoo Road and Lindsays Gap Road where carriageway width narrows to 3.6 metres, requiring northbound traffic to give way to oncoming vehicles. Council also notes the presence of school bus services on Garoo Road and at the Garoo Road / New England Highway interface. The Social Impact Assessment identifies the S202 and S218 school bus services and notes that their operation should be acknowledged in traffic scheduling to reduce accident risk.

- Council therefore considers it essential that any consent include provisions requiring:
 - a detailed Traffic Management Plan prior to construction;
 - formal consultation with Council in finalising haulage routes, timing restrictions and management measures;
 - specific recognition of school bus timings and community safety around those periods;
 - further review of the Garoo Road site access design and associated safety treatments;
 - pre-construction and post-construction dilapidation surveys for impacted Council roads;
 - a mechanism for road maintenance contributions and/or a Road Use and Maintenance Agreement; and
 - clear requirements around traffic management during wet weather and periods of deteriorated road condition.

WORKFORCE ACCOMMODATION, HOUSING AND SOCIAL IMPACTS

The EIS proposes a dedicated worker camp to accommodate up to 250 workers during the construction phase. The camp is proposed to be located in the eastern section of the Project Area, operational prior to the commencement of main construction activities, used for approximately 15 months, and decommissioned in the final stages of construction.

Council notes that the provision of an onsite worker camp may assist in reducing pressure on Tamworth's private rental market, short-term accommodation, and hotel and motel stock that could otherwise arise from a large temporary non-local workforce.

Council also notes that the introduction of a temporary workforce accommodation camp in a rural area may also give rise to local amenity impacts for nearby residential receptors, including potential noise, lighting, traffic and general disturbance in an area characterised by a relatively quiet rural lifestyle. For this reason, Council considers that the worker camp should be assessed and conditioned carefully, having regard to both its potential role in managing regional accommodation pressures and its potential impacts on the immediate locality.

- Council also considers that the camp must be appropriately serviced and operated so that it does not shift pressure from the housing market onto other forms of local infrastructure or create unmanaged impacts for nearby residents.
- Council's timing expectations remain. If decommissioning or workforce accommodation extends into the January Tamworth Country Music Festival period, accommodation must be located outside the Tamworth LGA or works suspended to avoid impacts on local accommodation.

- Council notes the proposed use of composting toilet systems within the camp. Further detail is required to demonstrate that these systems are appropriately sized for the anticipated workforce, including design capacity, servicing frequency, waste handling processes and contingency measures in the event of system failure. Council also expects clarity on waste collection, storage and disposal arrangements, including separation, transport and final disposal pathways.
- Council considers that a detailed Workforce Accommodation Management Plan should be required prior to construction. That plan should address occupancy, transport to and from work areas, behavioural expectations, emergency response, camp servicing, complaints handling, waste and water arrangements, security, amenity management for nearby receivers, and protocols for managing any change to camp duration.

AGRICULTURAL LAND USE, COEXISTENCE AND REHABILITATION

Council remains attentive to the implications of renewable energy development for agricultural land and rural land use.

The Land and Agricultural Impact Assessment states that Project infrastructure will result in the temporary loss of agricultural land during the life of the Project, but also states that the Applicant is committed to agrisolar practices and rehabilitation so the primary land use can return to agriculture following decommissioning.

Council acknowledges that these commitments are positive. However, agricultural impacts must be viewed over the full life of the Project, not just through construction. Council's earlier SEARs response noted that cumulative impact assessment should include cumulative loss of agricultural land from renewable projects in the locality, and that the agricultural impact is experienced across an operational timeframe of approximately thirty years. Council maintains that view.

- Council considers that conditions and management commitments should require:
 - clear identification of how agricultural practices will continue during operation, where proposed;
 - appropriate biosecurity controls during construction and operation;
 - protection of adjoining agricultural enterprises from dust, weed transfer, drainage impacts and traffic interference;
 - clear rehabilitation criteria capable of returning land to an agreed productive or otherwise beneficial final use; and
 - consultation with underlying landholders regarding decommissioning and rehabilitation outcomes.

BIODIVERSITY, WATERWAYS AND ENVIRONMENTAL VALUES

The biodiversity and aquatic ecology material identifies several important environmental values within and around the site.

Tamarang Creek runs through the centre of the subject land and Sugarloaf Creek along the western boundary, with both mapped as key fish habitat in Fisheries NSW spatial data. Further aquatic ecology material states that known Type 1 key fish habitat in Sugarloaf Creek and Tamarang Creek is avoided by the proposal, but that a small amount of disturbance may occur to a section of Type 3 key fish habitat in Tamarang Creek to facilitate construction of a single-lane bridge.

The same material notes potential habitat in Sugarloaf Creek for the threatened Southern Purple Spotted Gudgeon.

- Council requests further detail regarding the proposed bridge crossing of Tamarang Creek, including the precise location of bridge piers, construction methodology, extent of riparian vegetation disturbance, and specific mitigation measures to protect aquatic habitat during construction.

Council's earlier SEARs advice also requested further detail on aquifers, groundwater and bore water supply impacts, landscape modification, and water use planning in consultation with Council and landholders where relevant. Those concerns remain relevant.

- Council seeks clarification on the total groundwater demand over the life of the project, including construction and operational phases, and any potential impacts on local aquifers and existing groundwater users.
- Council recommends that the Construction Environmental Management Plan (CEMP) be prepared and provided to Council for review prior to commencement of construction works. Council therefore supports conditions requiring robust biodiversity and water management planning, including riparian protection, erosion and sediment controls, no-go areas around sensitive habitats, and appropriate monitoring and reporting where works occur near Tamarang Creek or Sugarloaf Creek.

NOISE, VISUAL AMENITY AND RURAL CHARACTER

Council acknowledges that the EIS includes specialist assessments dealing with noise, glint and glare, visual impacts and broader amenity issues. However, these issues remain significant for nearby landholders and should not be understated simply because the broader locality is rural in character.

Renewable energy development changes the experience of rural landscapes over long periods, and that change can be amplified where multiple projects are proposed across the wider locality. Council therefore supports enforceable conditions around noise compliance, complaints handling, landscaping and visual mitigation maintenance, and end-of-life rehabilitation to ensure rural character is not unnecessarily or permanently degraded.

ECONOMIC BENEFITS, LOCAL PROCUREMENT AND COMMUNITY BENEFIT

Council recognises that the Project has the potential to generate economic benefits during construction and operation. The Social Impact Assessment estimates significant direct and broader economic output during construction and identifies approximately 10 direct operational jobs, with operational employees expected to reside in the region.

Council welcomes these benefits, but stresses that regional economic benefit statements should not obscure the fact that localised impacts are borne specifically by host communities and local government. Projects of this scale should therefore provide structured, transparent and meaningful local benefit.

Council's earlier SEARs submission encouraged transparency around neighbour agreements and planning agreement arrangements and stated that any planning agreement should take into consideration impacted road networks, neighbouring properties and nearby communities. Council reiterates that position and strongly encourages the Department and proponent to continue engagement with Council regarding benefit sharing and any voluntary planning agreement or equivalent arrangement.

DECOMMISSIONING, REHABILITATION AND WASTE

Council's previous SEARs submission made clear that Council should not be left with legacy issues at the end of life of the proposed solar farm and BESS. Council requested that the EIS include a decommissioning plan, clear waste management pathways, rehabilitation criteria, consultation with Council and underlying landholders, and consideration of a decommissioning bond to ensure infrastructure removal, grid disconnection and land rehabilitation to an appropriate standard. Council maintains that position.

Council notes that the Preliminary Site Investigation (PSI) has identified contamination risks that warrant further investigation. Council agrees that a Detailed Site Investigation (DSI) be undertaken to further assess the nature and extent of any contamination identified within the PSI. Where contamination is confirmed, an appropriate Remediation Action Plan (RAP) should be prepared and implemented.

- In the absence of this information being provided during the assessment phase, Council recommends that conditions of consent require:
 - prior to the issuing of a Construction Certificate, a Detailed Site Investigation (DSI) must be prepared and submitted to the Principal Certifying Authority, further investigating contamination identified within the Preliminary Site Investigation (Preliminary Site Investigation – Garoo Solar Farm and Battery Energy Storage System – Prepared for the Trustee for Green Pulse Solar Farm and BESS Unit Trust – 8 August 2025 – Reference 0751705). Where the DSI identifies remediation is required, a Remediation Action Plan (RAP) must be prepared and submitted as part of the Construction Certificate application; and
 - prior to the issuing of an Occupation Certificate, a Validation Report must be provided demonstrating that any required remediation works have been completed in accordance with the approved RAP, where applicable.
- Council also supports a condition requiring a detailed Decommissioning and Rehabilitation Plan well before the end of operations, together with clear waste handling provisions that prioritise recycling and reuse over landfill, including for solar panels, battery components and associated infrastructure. Council remains supportive of exploring local and regional circular economy opportunities where feasible, provided those pathways are practical and compliant.

In Council's view, decommissioning is not a minor procedural matter. It is a central test of whether the Project is truly temporary and reversible in land use terms, or whether it risks leaving a long-term liability for future landholders, councils or the community.

CONCLUSION

Tamworth Regional Council supports renewable energy development in principle and acknowledges that the Garoo Solar Farm and Battery Energy Storage System may contribute to broader energy transition objectives. Council acknowledges elements of the proposal intended to manage potential impacts, including the inclusion of an onsite workforce accommodation camp, which may assist in reducing pressure on local housing and accommodation markets if appropriately managed and conditioned.

Notwithstanding this, Council remains neutral on the Project itself. Council's focus is on ensuring that, should the Project proceed, it is subject to strong, enforceable and practical conditions that properly protect local interests, minimise impacts on the community and local infrastructure, and secure appropriate long-term outcomes for the Tamworth region.

In particular, Council requests that the Department give careful consideration to:

- a strong cumulative impact lens, particularly in relation to traffic, housing, agricultural land and regional development pressure;
- formal road protection and cost recovery mechanisms, including traffic management, dilapidation surveys and road maintenance arrangements;
- a robust workforce accommodation management framework so the onsite camp genuinely functions as a housing mitigation measure;
- appropriate agricultural coexistence, biosecurity and rehabilitation provisions;
- strong protections for waterways, habitat connectivity and riparian environments;
- clear benefit-sharing and local engagement expectations; and
- a rigorous and enforceable decommissioning and rehabilitation framework that ensures no legacy burden is left to Council, landholders or the community.

Subject to those matters being appropriately addressed, Council looks forward to continuing to work constructively with the Department and the proponent as the assessment progresses.

Should you require any clarification regarding Council's advice, please contact Jordan Kirk, TRC Renewable Energy Project Coordinator, on the contact details below.

Regards,



Sam Lobsey
Manager, Development

Contact: Jordan Kirk on 0459 602 607 or Jordan.Kirk@tamworth.nsw.gov.au

8 April 2026