



MID-WESTERN REGIONAL COUNCIL
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Office of the General Manager

LP | LAN900160

7 August 2023

Mr Jai Reid
Energy Assessment
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Jai,

SUBJECT: NARRAGAMBA SOLAR FARM (SSD-60575715) SEARs ADVICE

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to provide input into the Secretary's Environmental Assessment Requirements (SEARs) for the proposed Narragamba Solar Farm. Council has reviewed the requirements and request that the following issues be specifically addressed in the Environmental Impact Assessment.

Workforce and Accommodation

It is noted in the Scoping Report that there will be an estimated 400 full-time workers at the peak of construction, with the construction period of approximately 20 to 24 months from the commencement of site establishment works.

It is noted that a potential temporary construction workforce accommodation camp is proposed as part of the application.

On-site temporary construction workforce accommodation is preferred by Council, particularly given the limited availability of suitable short-term accommodation in Gulgong and Mudgee, the closest towns to the project.

The workforce accommodation strategy should consider that Council does not support the use of tourist and visitor accommodation for any construction workforce. Due to the current low unemployment rate of 1.7% in the Mid-Western Region, Council requests the SEARs require the Proponent to include information on where the workforce is being sourced. A comprehensive workforce and accommodation plan should be provided as part of the Environmental Impact Statement (EIS).

Mid-Western Regional Council does not support "park and ride" type purposes on public land due to insufficient car parking available in the region, and no public car parks or public road infrastructure are to be used for park and ride. It is also requested that the Proponent consider the status and timing of all other state-significant developments within the Mid-Western Region and surrounding areas to minimise any adverse cumulative impacts.

Water

The SEARs should require the Proponent to identify suitable water sources for construction and operation, particularly in drought periods. Water usage estimates should also provide adequate

provision for drinking and sanitation purposes during the project and contingencies, such as additional dust suppression requirements during extended dry periods.

Proponents should not be relying on Council as a source of construction or potable water supply. The proponent is required to be self-sufficient in this regard.

Waste

A significant amount of waste is expected to be generated during project construction. Council requests the Proponent provide specific details regarding the expected waste to be generated during each phase, including construction waste and workforce sewage, as well as how it will be managed as part of the Environmental Impact Statement (EIS). Furthermore, a waste management plan should be developed in consultation with the Council before consent.

In this regard, Council wishes to advise that none of its waste facilities are appropriate or capable of handling the disposal of landfill waste generated by the project. The Mudgee Waste Facility has limited capacity to accommodate large quantities of landfill material likely to be generated by the project, as the existing Waste Cell is almost exhausted. Any other materials requiring disposal should be discussed with the Council. All of Council's other waste facilities are waste transfer stations accepting residential waste, which is then transported to Mudgee waste facility, they will not be suitable for waste from this project.

Community Engagement

Council requests a summary of community engagement, including attendance/participant numbers and issues raised/addressed.

Community Participation During Construction and Once Operational

Council requests the Proponent provide details on its proposed communications plan and identify mechanisms by which the community can provide feedback during construction and once operational. This should also include the Proponent's approach to dealing with complaints or compliance issues.

Traffic, Transport and Accessibility

Overview:

- The site is located along Merotherie Rd, 15km north of Gulgong
- The project will be accessed by Merotherie Rd from the Golden Hwy.
- Vehicle generation is said to be 250 light vehicles and 100 heavy vehicles per day. Note heavy vehicles expected to be B-doubles and some OSOM (Over Size Over Mass).
- An accommodation strategy has not been provided so the project impact on other roads is unknown. Vehicle generation needs to be determined before approval of any road upgrades. Cumulative impacts of other projects on potential routes used by workers travelling to and from the site will also need to be considered.
- Intersection performance impacts and level of service along the haulage route and worker access route is likely to be an issue due to cumulative impact with other REZ projects. A traffic impact assessment will need to be provided in full consultation with other REZ projects giving projected future existing traffic volumes along these routes with the traffic expected to be generated by the project during construction. A review of queuing (SIDRA) will be required to confirm the impact on intersection operations.

Merotherie Rd – Local access road (to be shared with other REZ projects)

Existing conditions:

3 x causeways

Unsealed

2018/19 traffic counts 23 vpd

Merotherie Road has roadside vegetation with conservation values of High and Medium. Assessment to be made on impacts of road widening and relative significance of roadside vegetation.

Specification for new works:

Road Design is to be based on traffic projection from traffic management plans prepared for the project. These traffic plans must assess ALL roads likely to be used by the workforce to travel to and from the site as well as the main transport route of Merotherie Rd itself.

Pavement and causeways are to be upgraded, at the cost of the applicant(s), in accordance with Austroads for OSOM and forecast traffic generation during construction, operation and decommissioning phases.

Design Standards for Development of Roads in accordance with "Austroads Guide to Road design part 3".

All road upgrade works need to be sealed at the cost of the Applicant and will require S138 approval.

SINGLE CARRIAGEWAY RURAL ROADS*

Element	Design AADT	Design AADT	Design AADT	Design AADT	Design AADT
	1-150	150-500	500-1000	1000-3000	➤ 3000
Traffic lanes	3.7 (1 x 3.7)	6.2 (2x 3.1)	6.2-7.0 (2 x 3.1/3.5)	7.0 (2 x 3.5)	7.0 (2 x 3.5)
Total Shoulder	2.5	1.5	1.5	2.0	2.5
Maximum Shoulder Seal	0	0.5	0.5	1.0	1.5
Total carriageway	8.7	9.2	9.2-10.0	11.0	12.0

Widening of carriageways on curves to suit heavy vehicles may be required. Private land acquisitions (if necessary) for road widening and/or re alignment is at the cost of the applicant.

The Applicant must obtain approval for the road upgrade works under section 138 of the Roads Act 1993.

Prior to issuing S138 approval MWRC (Mid-Western Regional Council) will require from the Applicant(s) the following:

- Cumulative impact assessment of traffic (current average vpd + forecast project generated by ALL shared projects).
- Confirm max load of OSOM.
- The Applicant must submit to the satisfaction of Council a geotechnical report confirming existing pavement conditions and upgrade road pavement design.
- The Applicant must submit design plans to the relevant roads authority's satisfaction which show that the proposed development accesses are designed to accommodate the turning path of the longest vehicle entering and exiting the site.
- The Applicant must complete any land acquisition necessary for the road infrastructure upgrade works approved under SSD (State Significant Development) conditions to the satisfaction of Council prior to issue of construction approval for the energy infrastructure.
- The Applicant must complete the road infrastructure upgrade works approved under SSD conditions to the satisfaction of Council prior to issue of construction approval for the energy infrastructure.

Other conditions:

Prior to the commencement of any construction, the Applicant must:

- (a) seek concurrence from TfNSW for any works to the intersection at Golden Hwy
- (b) Consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection, and support of the affected infrastructure;
- (c) Prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, drainage); and
- (d) Submit a copy of the dilapidation report to the Planning Secretary, Certifier and Council.

Protection of public infrastructure - Unless the Applicant and the applicable authority agree otherwise, the Applicant must:

- (a) Repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development, including excessive wear and tear to roads; and
- (b) Relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated due to the development.

Protection of Environment - assessment to be made on impacts of road widening and relative significance of roadside vegetation.

In accordance with Councils Draft Policy 'Major Project Roads Upgrade Policy' road upgrade works on council local roads are to be undertaken by Council and funded by the developer.

Mid-Western Regional Development Control Plan 2013

Council would like consideration to be given to the contents of the Mid-Western Regional Development Control Plan 2013, in particular section 6.5 on Solar Energy Farms. Council would like to highlight the clauses relating to the decommissioning and remediation of land following the cessation of the development, to ensure the preservation of agricultural potential of the land. Consideration should also be given to the following development standards, relating to siting of the development:

- Solar Energy Farms should not be located within 500m of any dwelling not associated with the development or from any lot upon which a dwelling may be constructed.
- Solar Energy Farms should not be located within 200m from a formed Local Public Road or 500m from a Regional or State Road. A greater distance may be required by the road authority where visual impact mitigation is necessary.
- Solar Energy Farms should not be located within 100m from a non-related property boundary; existing and proposed screenings may be used to minimise visual impacts to non-related properties. However, screening is not the only preferred method of minimising visual impact. Solar arrays shall be in positions to have minimal visual impact on nearby properties, especially existing dwellings and lots on which dwellings may be constructed.

Council acknowledges that local controls – such as Development Control Plans are not a technical matter for consideration in the determination of State Significant Development. Nevertheless, Council requests consideration be given to Section 4.6 of the DCP (Development Control Plan), as the standards adopted represent the Council and communities' expectations for such development and were the outcome of extensive community and stakeholder engagement.

Cumulative Impacts

In addition to the above, Council wishes to ensure significant consideration of the cumulative impacts of this proposal in conjunction with other approved and upcoming major projects in the region. The assessment should include, but not be limited to, the following cumulative impacts:

- Environmental impacts of the project, including but not limited to cumulative flora, fauna, and habitat loss, particularly impacts on threatened species, increased risk of grass fire escape and spread with loss of woodland communities, greater potential for bio-security impacts such as weed dispersal and new incursions on the site and surrounding agricultural areas, increased risk of feral animal incursion and impacts to stock, wildlife and human safety, groundwater impacts, contamination effects, waste disposal impacts, and cultural heritage impacts including Aboriginal and European heritage.
- Visual impacts of multiple renewable projects on private properties, important local features, and the public domain. This should encompass all State Significant Developments, not just wind projects.
- Land use conflicts resulting from multiple renewable projects in the area, which may impact primary production and rural-residential land uses.
- Transport and traffic impacts arising from multiple renewable projects on State, Regional, and local roads. This includes the significant increase in maintenance and resources required by the Council for project-related roads during both the construction and operation phases.
- Tourism impacts that affect local accommodation availability and the unique character of the Gulgong area. The area's appeal to tourists relies on its strong connection to heritage significance, scenic rural landscapes, and agriculture.
- Economic impacts, including effects on agricultural land availability, property devaluation, and reduction in the supply chain of local services and materials needed for other local construction projects.
- Acoustic impacts resulting from multiple renewable projects close to residents, as well as increased traffic movements.
- Social and amenity impacts the community with a large workforce, including unskilled workers temporarily located in the region to support the projects.
- Consideration of medical, educational, and other social service impacts should be considered.

Should you have any further enquiries regarding this matter, please contact Council on (02) 6378 2850.

Yours sincerely,

A handwritten signature in black ink, appearing to be the name 'BRAD CAM', with a horizontal line extending to the right.

BRAD CAM
GENERAL MANAGER