

7 November 2024



State Significant Development
(SSD-55968733)

Public Authority Consultation
(PAE-76817711)

RE: BURROWAY SOLAR FARM - EDIFY

Thank you for providing Council with an opportunity to comment on the project in Narromine Shire LGA.

The following comments are provided in relation to the documents on exhibition and current understanding of the Project.

For your information, Council have not had any meaningful discussions with Edify, surrounding a Voluntary Planning Agreement to date, and expect to be in contact post the exhibition period.

Should you wish to discuss the above-mentioned matters further please contact Council's Planning department on 6889 9999.

Kind Regards,

A handwritten signature in black ink, appearing to be "Phil Johnston", written over a horizontal line.

Phil Johnston
Director Community and Economic Development

Concept Waste Management

The concept waste management plan commits to the preparation of a Detailed Waste Management Plan and a Construction Waste Management Plan to be approved by Narromine Shire Council prior to construction commencing. Clarification is sought if this references the same document?

Narromine Shire Council waste facility was not identified as a location for waste disposal or recycling. Evidence of consultation with the proposed receival facility/ies and the traffic associated with waste disposal leaving the Shire is requested to be documented and assessed.

It is unclear whether site preparation works involve any waste volumes e.g.: removal of any farm fencing and infrastructure.

The developer needs to be aware Trangie and Tomingley do not accept commercial waste (therefore cannot be considered a disposal site for this project).

The documentation states "the three waste facilities in Narromine do not accept Hazardous Wastes" this is correct but Narromine Waste Facility can accept asbestos if appropriately contained/wrapped and the site is notified.

Traffic Impacts

NSC has concerns around the significant increase of Heavy Vehicles on the Eumungerie Road during the construction period. The Traffic Impact Assessment notes that Truck and Dog vehicles would transport quarry material, from Narromine.

Justification of the assessment around number of vehicles turning into the facility from Narromine is requested. NSC would like to understand how realistic this is and whether a BAL should be considered in addition to the BAR. The commitments to sourcing of local materials would indicate that a greater percentage of trucks from the south via Eumungerie Road would be expected.

The traffic impact assessment has not identified any specific local school bus routes and conflicts that may arise from existing accesses and stops used in vicinity of the site and main transport route. A measure should be included to ensure the safety of buses stopping and identify that it is not only heavy vehicles that may conflict with bus safety.

Future Approvals

The EIS in discussion of the proposed subdivision has not addressed the planning mechanism to achieve the subdivision. At which stage of the project the subdivision of land is required, has not been clearly detailed. The EIS states that "subdivision for the purpose of the internal substation and battery facility will be required". However, does not explain why this is required. Will the BESS (and substation) remain at end of life of the project and be excluded from rehabilitation, as is planned for the leased land?

If the subdivision of the land is required, this should be within the scope of the approval sought for the SSD project and not a separate Development Application approval to be determined



by Narromine Shire Council, at some undisclosed future stage. An application for a subdivision certificate can be received by Council. If the land is to be acquired by Essential Energy and excised for a 'public purpose' pursuant to SEPP (Exempt and Complying Development Codes) 2008, this should be clarified in future submission report by Edify.

The EIS does not include plans for proposed structures, nor appropriate site plans, with buildings or transportable structures shown. The EIS mentions future applications for construction certificate would also be needed. The developer should consider that in accordance with s19 of the *Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021*, a certifier must not issue a construction certificate for building work unless the design and construction of the building, as described in the relevant building work plans and specifications, is consistent with the development consent. Consideration should be made as to whether further development applications are sought or additional details of the proposed building work is provided.

Estimated Cost of Development

The EIS notes the Estimated Development Cost has been estimated by Denary Quantity Surveying and reported to Narromine Shire Council separately to the EIS. An abbreviated version dated 2 February was received. This was based on a preliminary design only and the scoping report information. NSC was expecting the CIV to be calculated at the time of lodgement of the EIS, with the calculations based on the details proposed, and with a breakdown of the items used to calculate the CIV. It is unclear if the road upgrade proposed, labour and personnel costs, including the payment of long service levies and other associated construction and labour costs, temporary laydown areas to be rectified have been included.

Project Footprint and Impact on Agricultural Land


The EIS states: 'Depending on an economic and technical assessment that will be undertaken during the project's Connection Application phase with Essential Energy, the BESS will be located either:

- in a single, centralised location, next to the substation, or
- distributed in modular enclosures throughout the site, in a decentralised manner similar to typical solar inverter enclosures.'

The assessment identifies that in areas where earthworks are necessary for construction of the BESS, substation and switching station, site facilities or access tracks, soils will be subject to higher impact disturbance. It appears the 'Burroway Solar Farm- Soil and Agricultural Impact Assessment' report assumes a centralised design. Commitments to returning land to pre-disturbance agricultural status following the life of the Project, should be aligned with the design and measures for managing soil. Reducing the land required to have topsoil stripped and stockpiled for extensive periods is encouraged.

Water Balance

The EIS provides vague details regarding water supply and use requirements. A water balance should be provided and the water source and proposed storages clarified. The estimated 30ML



requirement is not specified as what this volume accounts for. Ensuring a fire-fighting volume is reserved is supported. The EIS does not clarify how much water is otherwise proposed to be stored onsite.

The Traffic Impact Assessment notes MRV and HRV movements during the construction period, includes both water trucks and vehicles transporting materials such as concrete and fencing supplies which would be sourced from Dubbo. Clarity surrounding whether this means both the water and materials are to be sourced from Dubbo is sought.

The EIS indicates that any water required for cleaning of the panels will be brought to site in water trucks. Additional clarity on where this water is sourced is sought to be provided. The Traffic Impact Assessment does not mention any truck movement in the operational traffic details (section 3.1.2).

The EIS states: 'the project is not expected to have any impact on the availability of current surface water or groundwater resources to local landholders during either construction or operation' (section 5.5.3.3). However, the source of water to supply the project has not been identified, other than to say is supplied from 'off site' (section 7.5.5).

Stormwater Management

Stormwater management has not been adequately addressed in the EIS and supporting documents. One of the key infrastructure installation activities, noted in the EIS, was the installation of drainage works and regrading of surface features. However, in section 4.3.1.10 Drainage Management the EIS states: No permanent drainage designs are required or proposed due to the reduced risk of stormwater run-off impacts. The future submissions should clarify the extent of site grading and drainage basins and the like.

It is unclear what measures are proposed. The developer should commit to ensuring post-development flows leaving the site are consistent with pre-development flows.

Accommodation and Employment

The EIS references the pressure of the construction period on local accommodation for workers to be expected in Narromine. NSC would welcome future consultation regarding an accommodation and employment strategy. It is agreed that finalisation of this strategy during the detailed design and/or pre-construction phase is appropriate, to allow the most accurate information on the local and regional accommodation resources and relevant cumulative impacts be utilised.

Cumulative Impacts

The Burroway Wind Farm proposed by ACE Power, should be included as a project within close proximity to the Burroway Solar Farm by Edify.

