

Attention: Rita Hatem
NSW Department of Planning, Industry & Environment
Energy, Resources & Industry Assessments
Locked Bag 5022
PARRAMATTA NSW 2124

Email: Rita.Hatem@planning.nsw.gov.au

Dear Rita,

GAROO SOLAR FARM AND BESS (SSD-79747209) – REQUEST FOR INPUT INTO SEARS

I refer to your correspondence received on 11 February 2025 requesting Council's input into the draft Secretary's Environmental Assessment Requirements (SEARs) for the proposed Garoo Solar Farm and BESS to be located 291 Bulls Road, Garoo, 2340. The following advice is provided for your consideration:

While likely sufficiently covered on page 2 of draft SEAR's, Council requests the EIS doesn't just include cumulative impacts from the projects listed in the scoping report. The EIS should also include the projects listed below, and any new projects:

Project	Number	Stage	Locality
SOLAR			
Nottingham Park Solar Farm	SSD-58886962	Prepare EIS	61 Pryors Hill Dobsons Lane, Winton NSW 2344
Middlebrook Solar Farm	SSD-10455	Response to Submissions	Middlebrook Rd Loomberah, NSW 2340
Lambruk Solar Farm	SSD-67436209	Prepare EIS	Marsden Park Road, Ascot Calala Road and Macqueens Road
Bendemeer Solar Farm	SSD-36651552	Response to Submissions	4409-4461 Oxley Highway Bendemeer 2355
Garoo Solar Farm and BESS	SSD-79747209	SEARs	291 Bulls Road, Garoo, 2340
Tamworth Solar Farm	SSD-9264	Determination	2209 Soldiers Settlement Road, Somerton

WIND			
Bendemeer Wind Farm	SSD-78015999	Prepare EIS	4015-4017 Oxley Highway, Bendemeer Nsw 2355
Thunderbolt Wind Farm	SSD-10807896	Determination	New England Hwy, Kentucky, Nsw
Hills of Gold Wind Farm	SSD-9679	Determination	Morrisons Gap Road, Hanging Rock
TRANSMISSION			
New England REZ Transmission Project	SSI-74175972	Prepare EIS	New England and Upper Hunter Region
BESS			
Wallabadah BESS	SSD-78391212	Prepare EIS	300 Lindsays Gap Road, Wallabadah
Tamworth BESS	SSD-23830229	Response to Submissions	696 Burgmanns Lane, Kingswood, 2340
Calala BESS	SSD-52786213	Determination	474 Calala Lane, Calala
Kingswood BESS	SSD-63207219	Response to Submissions	744 Burgmanns Lane, Kingswood NSW 2340
HYDRO			
Dungowan Pumped Hydro Energy Storage	TBD		Dungowan Dam Rd, Ogunbil NSW 2340

Public Consultation

- The public consultation notice should be placed in the Northern Daily Leader;
- The Environmental Impact Statement (EIS) should be publicly displayed at Council's administration office, being 474 Peel Street Tamworth, NSW, 2340.
- All documents accompanying the application, including the EIS and supporting technical studies, should be provided in electronic format so that the information can be readily distributed to the public; and,
- A Community/Social Impact Assessment must be conducted to ensure all adjoining/nearby landowners and other key stakeholders are appropriately consulted prior to the lodgement of the application. The EIS should also detail the outcomes of any prior public consultation and document how any issues have been addressed.
- The EIS should detail any public consultation, including any issues identified by the public, and the manner in which the issues have been addressed prior to the submission of a future Development Application.
- Council concurs that there needs to be consistency between the information presented in the EIS and supporting technical reports, as specified in the draft SEARs.



Social Impact

- As mentioned in the Social Impact Assessment (SIA) Scoping Worksheet, the EIS should include detailed mitigation and enhancement measures to mitigate the social impacts identified as a result of the project.
- In addition, the EIS should also include details on the impact on housing market, demographics, and transport and traffic during the different phases of the project development including its end-of-life and post decommissioning phases.
- Council recommends the development of a Community Benefit Fund. Fundraising and income opportunities are limited in rural areas such as Garoo and surrounds. Education opportunities are also limited due to the low socio-economic climate within the communities and the impact of no public transport to the larger regional centres. Communities should be assisted to create a strong sense of identity and sustainable futures.
- A detailed accommodation and employment strategy will need to be undertaken to mitigate the potential negative impacts to the community and local economy. The Tamworth region serves as an event and tourism hub for the district and cumulative impact of renewable energy developments on short-term accommodation availability could have negative impacts to the tourism and events economy. At the core of Council's objective for short term worker accommodation is to ensure any proposal leaves a lasting positive legacy for the community. Temporary accommodation in the outlying towns should be considered as a possible option, in addition to exploring the opportunity for development of more permanent living options, which may be sold on or moved at the end of the construction phase to leave a lasting legacy in the community
- Community and Stakeholder Engagement Strategy should be included as a part of the EIS with engagement of residents of the Garoo area, as well as neighbouring town of Nundle and its surrounds. The enhancement and mitigation measures outlined within the strategy should respond to the potential social impacts (positive and negative) associated with the project. These measures should be identified through consideration of project impacts, existing knowledge, and stakeholder and community consultation.

Heritage

- Council supports an Aboriginal Cultural Heritage Assessment Report (ACHAR) being prepared in accordance with the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and the Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010).

Traffic & Access

- As identified in the draft SEARs, a TIA report is to be provided with the EIS that addresses traffic movements into and out of the site during the construction, operational and decommissioning phases of the proposed BESS. Additionally, the TIA report needs to:
 - address vehicle movements (including trucks, cars etc.) both in and out of the site on a 24 hours/day, 7 days a week basis and should also consider existing, proposed and predicted (when running at full capacity) traffic volumes;

- clearly identify and assess haulage routes to and from the site during the construction, operational and decommissioning phases of the proposed development, and address Transport for NSW, AUSTROADS, and Council guidelines/standards;
 - consider the potential impact any road upgrade works will have on existing land uses; and, in respect of the anticipated construction traffic, adequacy and dilapidation surveys of all infrastructure including pavements, culverts and bridges shall be conducted. These surveys shall form the basis of agreements with regards to upgrades, ongoing management, and reinstatement of the infrastructure during construction and prior to final commissioning of the site.
- Pavement deterioration and dust nuisance shall be the subject of specific management plans. (Internal and external).
- Identified in Section 3.1.7 of the scoping report, the access point to the project area during construction and operation is proposed via an unsealed access track that connects Garoo Road and Bull Road. All internal roads and access roads will require upgrading in line with the anticipated vehicles to utilise the site and this should be incorporated within TIA and road maintenance contributions.
- Lindsays Gap Road, Garoo Road and Bulls Road will likely require upgrade works to cater for the anticipated vehicles to utilise the site. The extent of these works will be considered based on projected traffic volumes, vehicle size and peak periods. This would be subject to further discussion.
- One-way bridges & culverts are located on the nominated transport routes which will likely require upgrading works. The extent of these works will be considered based on projected traffic volumes, vehicle size and peak periods. This would be subject to further discussion.
- The proponent indicates initial access to the site will be done via Garoo Road. The current arrangement of Garoo Road and access to the site is shown below. Access is proposed through (what appears to be crown road reserve – title search required to confirm) – Driveway access to be provided in accordance with Council’s minimum design standards and Austroads.
- Approval for works within crown road reserve and adjoining lot (Lot 1 DP 250846) required to be addressed.



- Confirmation of planning requirements including and presumed lot consolidation including and redundant road reserves (a portion of Bulls Road)

At a minimum it is expected level 3 bridge inspections of structures along the proposed haulage routes shall be undertaken to ascertain structure capacity. This will dictate proposed upgrades/restrictions to be addressed as part of any proposed haulage routes.

Visual Impact

- It is noted that the Scoping Report identifies that landscape screening may be required to minimise visual impacts from some viewpoints, and that a landscape and visual impact assessment (LVIA) will be undertaken as a part of the EIS. The proposed LVIA should include the following details regarding the proposed landscape screening:
 - the types of species to be planted;
 - the timing of when planting will occur;
 - ongoing maintenance responsibilities; and,
 - a contingency plan in the event of drought conditions and / or plant losses.
- As mentioned in the draft SEARs, Council supports the submission of a draft landscaping plan and evidence that it has been developed in consultation with affected landowners as a part of the EIS.
- Photomontages and section profiles should also be included in the LVIA to demonstrate the extent of existing views and vistas, potential visual impacts arising from the proposal, and illustrate the effectiveness of any existing and proposed landscape screening.
- As mentioned in the scoping report, further assessment should be undertaken to assess the impacts of glint and glare using industry standard methodology as a part of the Landscape Character and Visual Impact Assessment (LCVIA).
- A detailed assessment will need to be provided to address all points to highlight immediate impact on residences within the 5km radius of the project. Glare from the solar panels for oncoming traffic along Garoo Road in either direction throughout the day will need to be considered. Noting that the panels have a single axis tracking system with a rotational axis elevation of up to +/- 60 degrees in the solar trackers.

Residential Receptors

- The Scoping report identifies that there are two (2) non-project related residences within 500m of the site and approximately fourteen (14) non-project related residences within a 4km radius of the site. In this regard, it is important that the EIS adequately considers all potential impacts on residential receptors, including but not limited to:
 - Concerns regarding impacts of electro-magnetic energy and the cumulative impacts of this noting the proximity of the electricity sub-station;
 - Concerns regarding the risk of explosion of batteries. A risk assessment should be prepared which also refers to the applicable safety standards for the proposed use;
 - Noise (construction and operational) impacts;
 - Dust from construction activities
 - Glint and glare of solar panels
 - Traffic impacts; and
 - Visual impacts.
- The EIS should also clearly describe any proposed mitigation measures and the likely effectiveness of such measures.
- Air Quality should be added as a Key Issue in the SEARS. Dust during construction is a concern for residents and needs to be addressed in the EIS. If any unsealed roads are to be used as part of the site access route, then the impacts from dust on nearby receptors needs to be part of the assessment and mitigation measures proposed. The applicant has identified Air Quality as an aspect that requires a standard level of assessment (Table 6-1). Depending on the use of unsealed roads/tracks and the distance to sensitive receptors, this may need to be a more detailed assessment.

Development Contributions / Planning Agreement

- There should be further discussion between Council, the Proponent and the Department on whether a Planning Agreement should be entered into for the Project or, a Developer Contribution pursuant to Section 7.12 of the Environmental Planning and Assessment Act 1979 should be levied in accordance with the Tamworth Regional Council Section 94A (Indirect) Development Contributions Plan 2013. The Planning Agreement shall take into consideration all impacted road networks, neighbouring properties and nearby communities.
- Council encourages the proponent to be transparent in its calculations of neighbour agreements as part of the economic benefits of the Project. This may be through including these in the EIS.

Biophysical Impacts

- Given the proximity of the solar farm to the existing biophysical features on the site, identification of the impacts on existing aquifers and the ground water table are to be detailed as a part of the EIS.
- Following up on the Landscape character analysis provided as a part of Scoping report, a Landscape modification analysis and impacts should be addressed as a part of the EIS, including mitigation measures adopted across the life cycle of the project including its post decommissioning phase.

Water

- EIS should investigate the impact of development to neighbouring bore water supplies, if it intends to use them as the applicant has identified in the scoping report. A water use plan to be developed in consultation with TRC and underlying landholders.

TABLE 6-11 GROUNDWATER BORES IN THE PROJECT AREA

BoreID	Bore Depth (m)	Drilled Date	Purpose	Status
GW038431	60.9	01-04-1974	Stock and domestic	Unknown
GW062830	60.9	01-04-1986	Water supply	Unknown
GW044519	Unknown	Unknown	Stock and domestic	Functioning
GW055378	45.7	01-01-1981	Water supply	Unknown
GW043143	60.9	01-04-1974	Stock and domestic	Unknown
GW044518	24.4	Unknown	Stock and domestic	Unknown

6.10.1.4 WATER USE

The Project will require water for construction purposes (e.g. concrete mixing and standard dust suppression measures) and can be sourced from groundwater bores or purchased from associated landowners, adjacent landowners or Mid-Western Regional LGA. Water use may be subject to licenses under the *Water Management Act 2000*.

Agricultural Impact Assessment

- Council supports the preparation of an Agricultural Impact Assessment as identified in the scoping report and investigation into possible agrisolar opportunities that are compatible with a project.
- The cumulative impact assessment of nearby developments needs to include the (potential) cumulative loss of agricultural land in the locality from renewable projects. Section 6.14.4 Cumulative Impacts of the applicant's scoping report focused on the construction phase but the impact to agriculture will be through the operational phase of approximately 30 years.

Decommissioning / Waste

- Council should not be left with any legacy issues at the end of life of the proposed BESS. In this regard, the EIS should include a decommissioning plan and clearly identify and describe the management of any waste associated with the decommissioning of the site;
- Require EIS to include a decommissioning plan to be developed in consultation with TRC and underlying landholders. This is to include rehabilitation criteria of the land. As part of this, add a requirement to propose a decommissioning bond for decommissioning from the electricity grid/removal of infrastructure and connection assets from the site, and the standard of rehabilitation post solar farm and BESS land use that must be achieved to allow for the bond to be returned.
- The EIS should include details regarding the proposed rehabilitation of the land in order to return it to its former state or agreed final land use.

- Update requirement for a waste and resource management plan to be developed prior to construction of the solar farm and BESS in consultation with TRC. Upfront consultation needs to occur around the types and volumes of waste that can be disposed of at a TRC facility and where this won't be possible. This must include reuse/ circular solutions for all waste streams including volumes, timing, company to take the stream and logistics details for all phases (construction, operation and decommissioning). Where reuse/ circular solutions are not available, include disposal points for each waste stream both inside and outside of our LGA. This is to include volumes and timing of disposal and how cumulative impacts from all solar, BESS and windfarm projects effect relevant landfill license limits. This must be completed for all stages of the project.

Biodiversity

- Council recommends to update 'cumulative impact assessment of biodiversity values in the region from nearby developments'; to require transparency of distance cumulative impact has been assessed for and proposed mitigation measures to address cumulative impact.
- Council recommends to include options for additional local offsetting within the vicinity of the project and how this could be covered in the proposed planning agreement / benefit sharing program.

Stormwater and Flooding

- An assessment shall be undertaken of the impact of minor and major stream events, an associated management / mitigation plans shall be prepared.

Thank you for the opportunity to provide comment on the draft SEARs for the proposed development. Should you require any further clarification about the matters raised in this correspondence, please contact Renewable Energy Project Coordinator, Jordan Kirk on the below details.

Yours faithfully,



Sam Lobsey

Manager, Development

Contact: Jordan Kirk e-mail: Jordan.Kirk@tamworth.nsw.gov.au

25 February 2025