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11 July 2025

Nicholas Kumar
Department of Planning, Industry and Environment
GPO Box 39
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Dear Nicholas

Subject: Boro Solar Farm (SSD-87034971) - Request for input into SEARs

A review of the Scoping Report and Draft Secretaries Environmental Assessment Requirements (SEARs) has been undertaken in relation to the above proposal.

The key assessment items of specific interest to Council are detailed in the draft SEARs including decommissioning, traffic impacts, temporary construction ancillary infrastructure, impact on agricultural land, planning agreement/community benefits, workforce accommodation, community consultation and visual impacts and biodiversity.

Council is generally satisfied with the Draft SEARs document, however, wishes to provide the following additional commentary for the consideration of the Department prior to finalising the SEARs, and the Applicant during the preparation of the EIS:

Workforce Accommodation

At present there are numerous SSD renewable proposals that plan on relying upon Goulburn and its surrounding towns and villages to source employment and accommodation. These projects include Wattle Creek BESS, Wattle Creek Solar Farm, Canyonleigh BESS, Willavale BESS, HumeLink East, Hanworth BESS, Swallow Tail BESS, Bannaby BESS.

Further to this, numerous non-renewable SSD projects including Marulan Quarry, WSC Quarry, Cleary Bros Quarry, Marulan Gas Fired Power Stations, and the Woodlawn Advanced Energy Recovery Centre are also being considered and will similarly be relying upon Goulburn to source employment and accommodation. The reality is that there is unlikely to be sufficient workforce or accommodation capacity if multiple projects proceed to construction concurrently.

The Scoping Report indicates the potential for construction workforce accommodation onsite to be included as part of the project. The draft SEARs indicates that any accommodation camps required for the development, potentially subject to a separate approval process, are shown on the site plan. Council requests the draft SEARs are expanded to include particulars of, and an assessment of the likely impacts of the accommodation camp required to facilitate the project.

Economic Impact Commentary

The Scoping Report states *"The largest cities close to the project are Goulburn and Queanbeyan, with populations of 81,771 and 64,793 (ABS, 2021a/b) respectively. Major employment across the region excluding agriculture includes government administration, Defence, hospitals, computer system design and related services, and primary education."*

These figures are not an accurate indication of population size noting the figure of 81,771 is for the State Electoral Division of Goulburn which also includes Goulburn, Moss Vale, Bundanoon, Robertson, Crookwell, Taralga, Boorowa, and smaller towns and villages.

The population of Goulburn as an Urban Centre and Locality was 23,963 in 2021. (<https://abs.gov.au/census/find-census-data/quickstats/2021/UCL112009>).

Cumulative Impact Assessment

Cumulative impact is discussed in multiple locations within the Scoping Report, with primary references at Table 2-2; Table 6-24 and Table 8-2. The Scoping Report notes further discussion of these nearby projects in the context of potential cumulative impacts is provided in Section 13. Section 13 could not be located within the Scoping Report.

Each of the tables and commentary on the study area are using a 50km buffer to assess cumulative impacts for the social and economic impacts in the region. This is insufficient when reviewing the social and economic cumulative impacts as this radius excludes other SSD projects as noted above with overlapping timeframes also intending to utilise accommodation, workforce and transport routes within this region during the indicated timeframes.

Council would also like to see the cumulative impact assessment expanded beyond biodiversity, landscape and visual, noise, transport and access, social and economic, to also include an assessment of the cumulative impacts of water usage and waste during construction as key cumulative impact assessment items. As water usage and waste disposal for all of the listed projects (including the previously referenced Merino Solar Farm and Gundary Solar Farm) will also be sourced and disposed of in Goulburn, these cumulative impacts of multiple projects should be considered as part of the EIS reports.

Traffic and Transport

Council's preferred OSOM & B-Double transport route from Goulburn to the site for is via the southern Hume Highway interchange, Garrorigang Road, Sloane Street and Braidwood Road. Council supports the use of shuttle bus transfer of construction employees in order to reduce traffic volumes.

Council notes that the proposed access locations off Braidwood / Goulburn Road are within QPRC LGA however supports the upgrade of the intersections to provide BAR/BAL turn lanes to enhance traffic safety.

The Applicant should, in consultation with Council and TfNSW:

- Undertake an independent dilapidation survey to assess the existing condition of the roads used as the access route prior to construction or upgrading works; and

- Repair and/or make good any development related damage to the haul roads identified by the dilapidation surveys during construction or upgrading works in consultation with the relevant road authority.
- Prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary. This plan must include:
 - a) details of the transport route to be used for all development-related traffic;
 - b) details of the road upgrade works required;
 - c) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including:
 - details of the dilapidation surveys
 - ensuring compliance with the recommended access route described above;
 - monitor the compliance of vehicles using the access route;
 - temporary traffic controls, including detours and signage;
 - scheduling the arrival and departure of heavy vehicles from the site to avoid the PM peak hour where practicable;
 - notifying the local community about development-related traffic impacts;
 - procedures for receiving and addressing complaints from the community about development related traffic;
 - minimising potential cumulative traffic impacts with other projects in the area;
 - (ix) minimising potential for conflict with school buses and other road users as far as practicable, including preventing queuing on the public road network;
 - minimising dirt tracked onto the public road network from development-related traffic;
 - details of the employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service;
 - encouraging car-pooling or ride sharing by employees;
 - scheduling of haulage vehicle movements to minimise convoy length or platoons;
 - responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding;
 - responding to any emergency repair or maintenance requirements; and
 - a traffic management system for managing heavy vehicles requiring escort;
 - d) a driver's code of conduct that addresses:
 - driver fatigue;
 - procedures to ensure that drivers adhere to the designated transport routes and speed limits; and
 - procedures to ensure that drivers implement safe driving practices;
 - e) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan; and
 - f) provisions for reporting to TfNSW of vehicles using the access route every 3 months during construction.

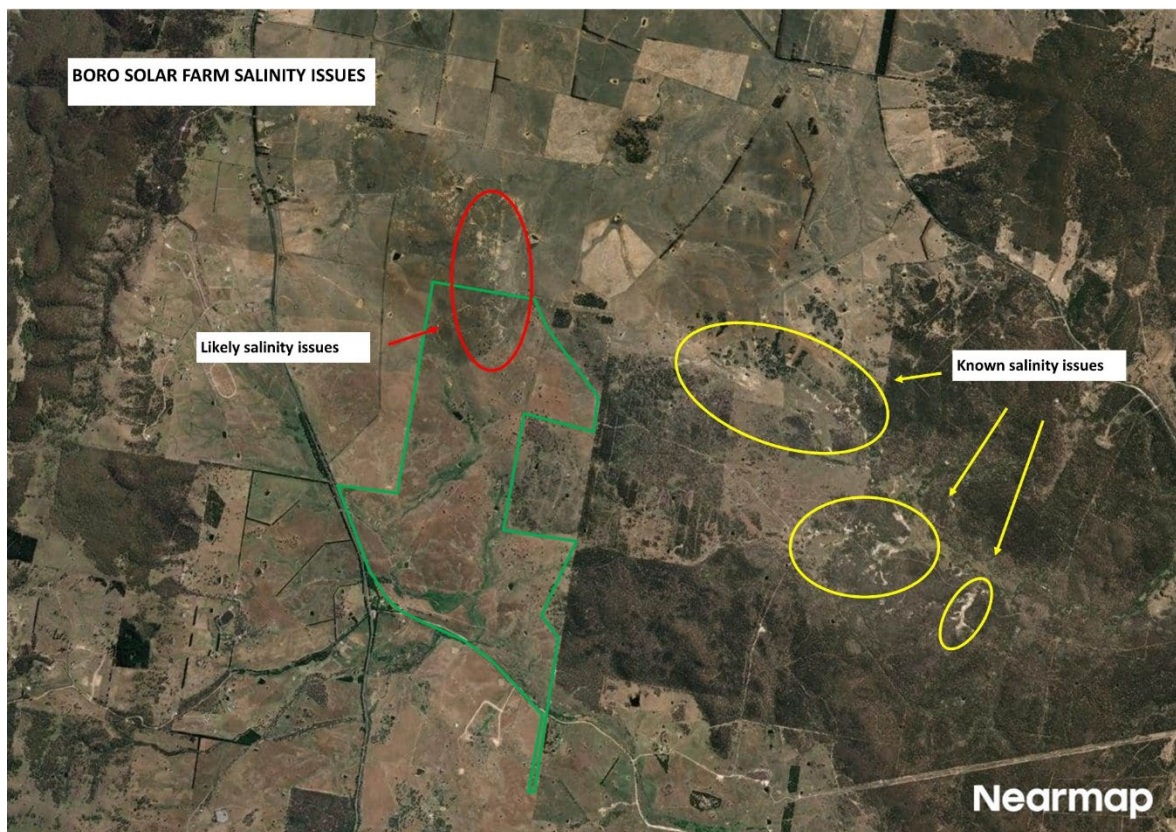
Biodiversity

The Preliminary Biodiversity Assessment Report has been broadly correctly prepared and identifies that further site surveys and a detailed Biodiversity Development Assessment Report (BDAR), including targeted field surveys, will be required to be completed for the EIS.

The Preliminary BDAR has also identified presence of a CEEC (& SAIL) on the land and also correctly identifies that a referral will be required to the Commonwealth as the project is likely to impact on MNES. However, there are some errors and issues that have been identified in reviewing the Preliminary BDAR and Scoping Report.

Page 89 of the Scoping Report (*Table 6-20 Land and soil characteristics of the area*) states that “The data provides no indication of salinity”.

Significant salinity issues are known to be present in the local area and inspection of aerial imagery strongly suggests present of saline scalds in the northern part of the subject land. Potential impacts of construction of a solar farm on water runoff and likely impacts on local salinity issues will need to be addressed.



Flora surveys for the Preliminary BDAR are stated as being conducted during July 2025. July is not an appropriate time of year for conducting flora survey work in the Southern Tablelands. In the Southern Tablelands many local grassland species have an annual cycle where they actively grow, flower and set seed in spring and early summer, and then die back to a dormant underground structure such as a rhizome, corm, bulb or tuber with the onset of hot, dry conditions in summer.

Identification and recording of these species must be done at an appropriate time of year as they are generally not detectable or identifiable during late summer and early winter. For most of these species, the required survey time is in the spring months.

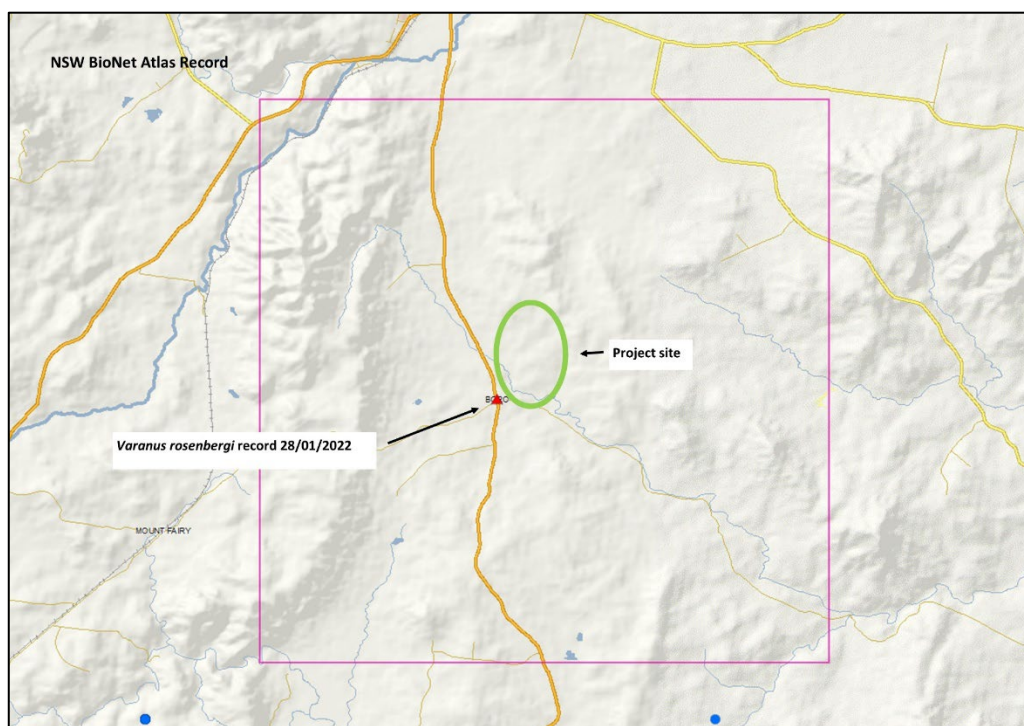
Examples include plants in the genera *Arthropodium*, *Dichopogon*, *Diuris*, *Calochilus*, *Caladenia*, *Glossodia*, *Microseris*, *Thysanotus*, *Wurmbea*, *Hypoxis*, *Burchardia*, *Tricoryne*, *Thelymitra* and *Swainsona*.

This is the reason for example, why threatened species survey guidelines specify that surveys for Buttercup Doubletail orchids (*Diuris aequalis*) must be undertaken between October and November.

Timing of survey work is also important for accurate identification of many grass species, as this requires the presence of flowering structures. Conducting survey work when grasses are not in flower is likely to lead to underestimates of grass species richness.

The flora list provided in the Preliminary BDAR contains some extremely unlikely records:

- *Viscum album* is listed in the native species table. *Viscum album* is an exotic mistletoe that naturally occurs in the Northern Hemisphere and has never been previously recorded in NSW.
- It is not an Australian native plant and the likelihood of it being present at Lower Boro, NSW is extremely low. If it is present, this must be notified to Plant Health Australia as a matter of urgency as an incursion of this exotic hemiparasitic plant would potentially represent a significant risk to the Australian horticulture and forestry industries.
- The flora list also includes *Parsonsia straminea*. This native vine is usually found in rainforests and wet sclerophyll forests. It is not naturally found in the Lower Boro area. It is frost and drought sensitive and it is extremely unlikely that it would be present or able to cope with the local climate.
- The flora list also includes *Erica arborea*. This exotic tree heath has never been previously recorded in the local area and if it is present this too would be of significance as it has potential to become an environmental weed in the Southern Tablelands.
- The Preliminary BDAR and Scoping report incorrectly identify that there are no recent records of Rosenberg's Goanna *Varanus rosenbergi* at Boro. There is a record from 2022 of a Rosenberg's Goanna at Boro in the NSW BioNet Atlas. Refer to BioNet Atlas map below:



- The Preliminary BDAR and Scoping report state that there are 6 recent records of *Diuris aequalis* in the local area. In fact, there are 11 records of this species within 5 km of the subject land since 30 June 2020 (ie within the last 5 years). This species is listed as Endangered under both the Commonwealth EPBC Act and the NSW BC Act. Significant populations are known to occur locally that are monitored by DCCEEW Threatened Species Officers and it is highly likely to be present on parts of the subject land for this project. Targeted threatened species surveys for this plant, following approved survey guidelines, must be conducted as part of the biodiversity assessment for the project.
- The Preliminary BDAR identifies the project site as occurring in the Bungonia Sub IBRA, but it is in the Monaro Sub IBRA.

If you require any further information, please contact me on (02) 4823 4480.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'SA Mc', is positioned above a thin horizontal line.

Scott Martin
Director Planning & Environment