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Dear Kurtis

Goulburn River Solar Farm (SSD 33964533) Amendment Report 2 for the Temporary Workers Accommodation Facility

Thank you for the referral via the NSW Major Projects Portal of the State Significant Development (SSD) 33964533 Amendment Report (2) covering the proposed establishment of the Temporary Works Accommodation Facility (TWA) as an ancillary facility to the Goulburn River Solar Farm.

The National Parks and Wildlife Service (NPWS) as part of the Department Climate Change, Energy, the Environment and Water (DCCEEW) appreciates the opportunity to provide comment on the Amendment Report for the SSD as the proposed facility occurs on land adjacent to, Goulburn River National Park reserved under the *National Parks and Wildlife Act 1974* (NPW Act).

On review of the *Goulburn River Solar Farm Temporary Workers Accommodation Facility Amendment Report, prepared by Umwelt (Australia) Pty Limited for Lightsource bp, dated May 2024* NPWS raises the following matters and recommendations in summary below, and in more detail in Attachment 1 to this letter. Matters raised centre around:

1. potential for, and increased risk of unauthorised or unsafe use of the national park due to proximity of the temporary accommodation facility to the national park, and it's accessibility.
2. landscape and visual impacts around lighting and light pollution, and associated effects on the national park and its biodiversity values.
3. noise and vibration generated by the temporary workers accommodation facility, both with operational use of the 400-bed facility, and the use of generators 24/7 during operation.
4. consideration and clear management of bushfire threat, standards of road construction and security of access with the placement of the accommodation facility.

If you have any further questions about NPWS response, please contact the NPWS Manager for the Mudgee Area via npws.mudgee@environment.nsw.gov.au.

Yours sincerely

David Crust
Director, Blue Mountains
NSW National Parks and Wildlife Service

12 June 2024

Attachment 1 – NPWS comments on SSD 33964533 – Amendment Report 2.

Attachment 1 – NPWS Response SSD 33964533 Amendment 2

The NSW National Parks and Wildlife Service (NPWS) has a statutory obligation to ensure environmental impacts associated with development proposed adjacent to land reserved as Goulburn River National Park under the *National Parks and Wildlife Act 1974* (NPW Act) which affect the land are appropriately considered.

NPWS acknowledges that the proposed Goulburn River Solar Farm (Project) initial Environmental Impact Statement was submitted to the Department of Planning, Housing and Industry (DPHI) in May 2023, and this proposed amendment is stated to be permissible under s.37 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation). As this amendment relates to the establishment of a Temporary Workers Accommodation Facility (**TWA**) NPWS note that it accords with the provisions of s.2.36(1)(b) of the State Environmental Planning Policy (Transport and Infrastructure) 2021 as the facility is ancillary to the renewable energy development.

Overall, the proposed TWA consists of a 400-bed capacity workers accommodation facility, covering the anticipated peak workforce required to support the solar farm's construction. The TWA is located near the project site main access point. The facility will consist of prefabricated modular accommodation units, recreational facilities and supporting buildings, linked by walkways, all of which are temporary. This includes services such as pipes and cables which will be modular, and above ground, and all will be removed from site following the solar farm construction completion. The facility aims to be self-sufficient, with onsite power generation, potable water storage, water treatment facilities, food storage and preparation facilities. No on-site disposal or treatment of waste is proposed.

On review of the *Goulburn River Solar Farm Temporary Workers Accommodation Facility Amendment Report, prepared by Umwelt (Australia) Pty Limited for Lightsource bp, dated May 2024* (TWA Report) and the attached technical appendices NPWS raises the following matters under the themed headings below.

1. Unauthorised access or use of the national park

NPWS raises concerns around the potential for unauthorised, damaging or unsafe use of the national park during the occupation of the temporary workers accommodation facility due to the general proximity and accessibility of the land reserved under the *National Parks and Wildlife Act 1974*.

NPWS recommend -

- a. all future solar farm operational plans restrict use and access to the national park, permitting only authorised activities consistent with the [Goulburn River National Park and Munghorn Gap Nature Reserve - plan of management](#)¹ (NPWS 2003).
- b. site inductions include restrictions on access associated with the national park and focus on protection of its natural and cultural values.
- c. installation of security fencing around the temporary workers accommodation compound to control access to the national park and sensitive areas.

2. Landscape and visual impact (visual)

On review of the SSD Addendum *Landscape Character and Visual Impact Assessment* (Addendum LCVIA 2 as Appendix C) for the proposed TWA the additional impacts attributed to the TWA on the landscape character and visual amenity are noted. As the TWA is located adjacent

¹ Goulburn River National park Plan of Management - <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Parks-plans-of-management/goulburn-river-national-park-plan-of-management-030117.pdf>

Wollara Road and the surrounding national park, the changes to sightlines will be evident following installation of demountable buildings and their 24/7 operation during the solar farm construction period.

NPWS raises concerns around lighting associated with the TWA and impacts to sensitive biodiversity values of the national park. Although the LCVIA 2 states that no change from the current 'low' rating of landscape character applies, the proposal will impact the dense forested landscape which is the surrounding national park and will result in increased and potentially excessive lighting.

NPWS recommends -

Ensure lighting design accords with provisions as set out in the:

- a. [NSW Dark Sky Planning Guidelines](#)² (Department of Planning and Environment, 2023), in that good lighting design avoids excessive light spill into the night sky and will also protect the surrounding sensitive areas which include the national park.
- b. [National Light Pollution Guidelines for Wildlife](#)³ (DCCEEW, 2023) in the conservation, and protection of natural biodiversity values attributed to the national park at the interface with the Goulburn River NP.
- c. LCVIA 2 to place common areas, and car parking within the internal (central) zone of the TWA or on the roadside to contain or reduce incidence of light spill outside of the confines of the TWA.

3. Noise and vibration

NPWS reviewed the Addendum Noise and Vibration Impact Assessment (NVIA 2) which was prepared to assess the change to noise, and vibration impacts as part of the TWA, especially to Receiver R10 which represents Goulburn River National Park. Overall, the TWA will result in increased noise levels to both passive recreational users of the national park and biodiversity values including fauna.

However, the NVIA 2 alludes to '*the vastness of the park and available bushwalking area*' of the national park and reasons park visitors use other parts of the national park during the TWA operation as an alternative. The proposed TWA generators, of which there are 10 units, are predicted to be the loudest mechanical and electrical plant item(s). With these plant items running simultaneously, noise emissions would still approximately equate to *LAeq(15minute) 50 dBA* although the report claims that the noise will be 20dB(A) lower than the loudest construction activity. However, these generators will likely operate 24/7 to meet the needs of the TWA. This will affect recreational users of the national park and natural (biodiversity) values during operation of the TWA as adverse impacts on wildlife are detected above 40dB(A).

NPWS recommends -

Revision of the Addendum Noise and Vibration Impact Assessment, to:

- a. acknowledge noise levels above 40dB(A) have the potential to impact wildlife in the national park. NPWS advises that land reserved under the *National Parks and Wildlife Act 1974* is to be treated as a sensitive receiver and noise levels should not exceed 35dB(A).
- b. re-evaluate generator placement in the layout of the TWA to reduce noise impacts and effects to the national park.
- c. provide an acoustic (noise) monitoring program to ensure levels are adhered to, and not exceed 35dB(A) on the boundary of the national park.

² Dark Sky Planning Guideline <https://www.planning.nsw.gov.au/policy-and-legislation/environment-and-heritage/dark-sky/dark-sky-planning-guideline>

³ National Light Pollution Guideline for Wildlife <https://www.dcceew.gov.au/environment/biodiversity/publications/national-light-pollution-guidelines-wildlife>

4. Bushfire threat

On review of the Addendum Bushfire Threat Assessment (as Appendix E) NPWS notes that no consultation was undertaken with our agency as part of the agency consultation framework for bushfire assessment. The location and operation of the TWA has the potential to reduce or impede access for fire fighting vehicles and firefighters as it is located on the main entrance point to the project site. As the Bushfire Threat Assessment does not reference the Liverpool Range BFMC Fire Access and Fire Trail Plan no concise information is provided on fire trail access through the project site. The access and egress via the internal track network is critical to any response to bushfire threat attached to the TWA. Access to these fire trails is critical to NPWS undertaking hazard reduction works and for wildfire response subject to the reserve's fire management strategy.

NPWS note Asset Protection Zones (APZs) to be established under the report are variable ranging from 12m to 29 m, with distances calculated to achieve compliance with the radiant heat threshold of 29 kW/m² for a demountable. The report states that between 28m, and 54 m of separation can be achieved between the TWA and the property boundary with the national park which exceeds the required APZ. NPWS raises concerns that this area appears to be covered in native vegetation and does not represent an appropriate defensible space for firefighting purposes.

NPWS recommends -

Revising the Addendum Bushfire Threat Assessment to include:

- a. consultation with NPWS regarding security of access to existing fire trails within Goulburn River NP.
- b. consideration of the [Goulburn River National Park and Munghorn Gap Nature Reserve Fire Management Strategy | NSW Environment and Heritage](#)⁴ (DEC, 2002) with regard to NPWS fire trail connections. Acknowledge the statutory function that the RFMS fulfils and NPWS responsibilities under s.48(4) and s.44(3) of the *Rural Fires Act 1997*.
- c. Recognition of the relevant Fire Access and Fire Trail Plan for this locality, and acknowledge the critical fire trail access as a designated **Tactical – Category 9** fire trails and accord with the [Fire Trail Standards](#)⁵ (NSW RFS, 2023) and construction standards subject to [Fire-Trail-Design-Construction-and-Maintenance-Manual](#)⁶ (NSW SCS, 2017).
- d. adequate mitigation measures to reduce ignition risk, or threat from the TWA during occupation. This should include provision of a 100,000l static water supply specifically designated for firefighting response.
- e. creation of a (static or floating) legal easement to secure lawful access benefiting NPWS through the property to support access to the national park. NPWS accepts that the roads will be maintained and open at all times via an internal track network from Wollara Road however this is not secured legal access.

⁴ Goulburn River National Park RFMS - <https://www.environment.nsw.gov.au/research-and-publications/publications-search/goulburn-river-national-park-and-munghorn-gap-nature-reserve-fire-management-strategy>

⁵ NSW RFS Fire Trail Standards - https://www.rfs.nsw.gov.au/_data/assets/pdf_file/0009/69552/RFS-Fire-Trail-Standards-Nov2023.pdf

⁶ Fire Trail Design Manual - https://www.rfs.nsw.gov.au/_data/assets/pdf_file/0009/97569/Fire-Trail-Design-Construction-and-Maintenance-Manual-FINAL_reducedsize.pdf