

17<sup>th</sup> March 2023

Nestor Tsambos  
Environmental Assessment Officer  
Planning Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Sir/Madam

**ADVICE SECRETARY ENVIRONMENTAL ASSESSMENT REQUIREMENTS – SSD-55968733-PUBLIC AUTHORITY CONSULTATION (PAE-56076466), NARROMINE SHIRE COUNCIL**

Reference is made to your request for Council's comments in relation to the issuing of Secretary's Environmental Assessment Requirements (SEARs) for the proposed Burroway Solar Farm. It is acknowledged that the applicant has prepared an initial scoping report and that additional investigations and studies will be required to be undertaken to allow a full assessment of the proposal.

Narromine Shire Council has reviewed the information provided by Edify Energy and request the following information be provided within the Environmental Impact Statement (EIS) for this State Significant development.

**1. Local and Regional Strategic Plans**

The EIS shall address Council's local strategic plans including the:

- a. Narromine Local Strategic Planning Statement 2020;
- b. Narromine Agricultural lands Strategy 2013;
- c. Residential and Large Lot Residential Land Use Strategy 2018; and
- d. Central West and Orana Regional Plan 2036.

Whilst these strategies are not specific to the proposed land use, the application should address the principles that are contained within each document that related generally to:

- The provision of infrastructure;
- Environmental conservation;
- The significance of agricultural land; and
- Economic growth.

**2. Development of a suitable Voluntary Planning Agreement**

The Scoping Report references a proposed Community Benefit Fund. Narromine Shire Council would welcome the developer entering a voluntary planning agreement for the Project. Consultation regarding this matter is expected.

### **3. Access, Traffic and Transport**

Council seeks a traffic and access impact assessment that takes into consideration the following:

- a. The impact of increased traffic movements, type, and number of vehicle movements on Council's road network;
- b. The level of service required to facilitate an increased traffic volume as the result of the proposal and if any Council roads will require an update to support the increase in traffic and heavy haulage. This should specifically address some matters specifically referred to in the Scoping Report.
- c. Road safety audit is sought to be provided as part of the EIS and design phase.
- d. Site control measures should also be implemented so that there is no distraction nor interfere with a road user/ driver.

### **4. Lease area/Subdivision**

Clarify if land subdivision is sought as part of the application. Subdivision provisions of the Narromine LEP 2011 should be referenced and the permissibility of subdivision of the land. Proposal to subdivide primary production zoned land below the minimum lot size is possible with the LEP provisions only for the purpose of primary production (clause 4.2 Rural subdivision).

### **5. Workforce accommodation**

Workforce issues are requested to be addressed in a social impact assessment. Accommodation for construction workforce in particular should be demonstrated. Where applicable, the EIS should refer to the provisions of the Narromine LEP 2011 *clause 5.25A Temporary Workers' Accommodation in Zones RU1, RU5 and R5*.

### **6. Water Management**

The EIS shall consider the potential for groundwater contamination as well as the contamination of nearby watercourses. Contamination and mitigation measures shall be detailed in the EIS along with preventative measures to contain runoff and sediments from the proposed development impacting on water resources.

An assessment of the impact of any water management devices and outlets/diversions on public roads should be made.

Additionally, the proposal shall consider the impact of the proposed construction methods on the soil profile and stability of the site along with erosion and sediment control measures, including surface water runoff management.

## **7. Bushfire**

The EIS shall address how the proposed development will be consistent with the NSW Rural Fires Service Planning for Bushfire Protection guideline and a preparation of a Bushfire Management Plan shall be provided in order to minimise the risk of bushfires and detail the control measures proposed to be implemented onsite.

Any emergency procedures that may require Council resources should be subject to consultation.

Clear indication of the risk of battery storage and solar array to threat of fire and design measures adopted to minimise such risk should be included in the EIS.

## **8. Visual Impacts**

The visual impacts of the proposed development and associated infrastructure and overburden are likely to detract from the rural lifestyle and amenity. Mitigation of visual impacts shall be detailed in the EIS.

## **9. Ancillary Elements including New Buildings**

Any new buildings proposed as part of the development will be required to meet the requirements of the Building Code of Australia and will be subject to any relevant separate Development Consent, Construction Certificate, and Section 68 Activity Approval or the like.

The EIS shall identify and provide management options for the storage of hazardous goods onsite and the risk these pose to the development site and surrounding lands.

## **10. Rehabilitation**

The EIS shall detail and document the proposed rehabilitation methods to be implemented. The objectives should be made clear, as whether the end of life goal is to return any land to native vegetation vs agricultural pursuits.

Clarify the responsibility for final rehabilitation, will this be the Company or the landowner in the land use agreement?

Please contact Planning on 6889 9999 if you have any queries or would like to discuss the matters identified further.

Yours faithfully



Emma Yule  
**Manager Planning**