

James Bellamy

From: Simon Vivers <svivers@uralla.nsw.gov.au>
Sent: Wednesday, 12 June 2024 9:20 AM
To: James Bellamy
Cc: Cameron Ashe; Uralla Mayor; Emily Sims; Robert Crouch; Toni Averay
Subject: RE: Deeargee Solar (SSD-70753725) - Request for Advice on SEARs - USC Response

Hi James,

I want to firstly thank you for the opportunity and to apologise I am getting this to you a bit late.

Uralla's Mayor (Cr Robert Bell), Cr Robert Crouch and Strategic Planner Emily Sims have developed the following response, within the table below for your consideration.

Uralla Shire Council (USC) is grateful for the opportunity to respond to the SEARS for the Deeargee Solar Farm. ACEN have been proactive with their consultation and engagement and we have had the benefit of working with them on Stage 1 of New England Solar Farm (SSD-9255).

Where USC has previously objected to renewable energy SSDs, it has been in part due to insufficient information detailed within the EIS on certain aspects of the development which cause an impact beyond the extent of the suite. Notably, this includes:

- Downstream impacts on endangered aquatic species and habitats; and
- Insufficient consideration of where quarried materials and water might travel from and where and if they can be sourced.

It is also important to note USC is working proactively with developers and EnergyCo to coordinate a housing and accommodation strategy within our Shire, as ACEN have flagged in their scoping report. We would like the EIS to require a worker accommodation strategy that has been developed *with* Council, to Council's satisfaction.

Further comments and requests are as follows:

Issue	Summary Request	Further Comments
General Requirements:	- Provide a detailed framework of provisions for end-of-life/decommissioning.	Council is not satisfied with the typical end-of-life arrangements which are contracted into landowner agreements. There is considerable (intolerable) risk that the parties to private agreements will cease to exist after 30 years, leaving Council and community exposed. USC continues to advocate for bonding.
Key Issues:		
Biodiversity	- Assessment of potential downstream impacts (within an evidence-based threshold of erosion and sediment on listed aquatic threatened species, populations or ecological communities, scheduled under the <i>Fisheries Management Act 1994</i>, and a description of the measures to minimise and rehabilitate impacts.	Council's most recent experience with the EIS for Thunderbolt Wind Farm (SSD-10807896) was that insufficient consideration was given to the impacts on downstream Bells Turtle populations – this was subsequently conditioned in IPC consent.

	- Consideration of how the development might enhance onsite biodiversity.	With reference to the recent Building Better Biodiversity on Solar Farms Guide developed in the New England
Transport	- An assessment of the likely transport impacts to the site access route(s), including over-dimensional vehicles/ heavy vehicles requiring escort, site access point(s), any Crown land, particularly in relation to the capacity and condition of the roads, road safety and intersection performance; <i>and haulage of all materials e.g. aggregate and water onto site.</i>	USC has been caught out previously by aggregates and water being hauled by local subcontractors onto the site that were not conditioned to use the prescribed access routes. Some consideration for the routes used for hauling locally source quarried material, in particular, would provide certainty for Council re: impacts to local roads.
Water	- Details of water requirements and supply arrangements <i>including transportation routes</i> for construction and operation (including consultation with suppliers);	As per above.
Social	- Including an assessment of the social impacts or benefits of the project for the region and the State as a whole in accordance with the <i>Social Impact Assessment Guideline</i> (DPE, 2023), including consideration of any increase in demand for community infrastructure services, and consideration of construction workforce accommodation <i>to the satisfaction of the Council</i>	USC is working proactively with developers and EnergyCo to coordinate a housing and accommodation strategy within our Shire. It would be helpful if the EIS required the developer to have their accommodation strategy 'signed off' by Council.
Economic	- Including an assessment of the economic impacts or benefits of the project for the region and the State as a whole and provide details of any proposed voluntary benefit sharing programs in accordance with the Solar Guideline <i>and Council's Community Benefit Sharing policy</i>	Council has adopted a Community Benefit Sharing contribution in accordance with the Department's draft <i>Benefit Sharing Guideline</i>
Waste	- Provide a waste management plan prepared in accordance with the Solar Guideline <i>and to the satisfaction of Council</i>	Council's capacity to take waste is limited. It would be helpful if the EIS required Council to sign-off on the waste plan.

If you have any queries, please contact Emily or myself.

Regards,

Simon Vivers

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From: James Bellamy <james.bellamy@dpie.nsw.gov.au>
Sent: Tuesday, June 4, 2024 9:49 AM
To: Simon Vivers <svivers@uralla.nsw.gov.au>
Cc: Cameron Ashe <cameron.ashe@dpie.nsw.gov.au>
Subject: Deeargee Solar (SSD-70753725) - Request for Advice on SEARs

Hi Simon,

Thank you for the phone call earlier.

Please see the draft SEARs attached. Additionally, the webpage containing the scoping report can be found via [this link](#).

If you would be able to provide feedback on these draft SEARs as soon as possible that would be much appreciate.

Should you have any further questions regarding this matter, please do not hesitate to contact me.

Kind Regards,

James Bellamy
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I acknowledge the traditional custodians of the land and pay respects to Elders past and present.