

27 October 2017

sent by email correspondence

Mr Anthony Ko  
Planner Officer  
Department of Planning & Environment  
320 Pitt Street  
Sydney, 2000

Dear Anthony

**Hay Solar Farm (SSD 8113)**  
**Response to submissions in relation to Environment Impact Assessment**

This Submissions Report responds to submissions made by community, industry and government agencies on the Environmental Impact Assessment (EIS) report submitted by Plains SF No1 Pty Limited to the NSW Department of Planning and Environment (DPE) on 11 August 2017 for the development, construction and operation of a solar PV renewable energy generation facility known as the Hay Sun Farm. Responses have been prepared by Overland Sun Farm Pty Limited (**Overland**), on behalf of Plains SF No1 Pty Ltd.

**Submission**

DPE received nine submissions on the submitted EIS for the Hay project, including seven from government agencies, one from a special interest group and one from the general public. The EIS exhibition period commenced on 31 August 2017 and concluded on 29 September 2017.

Appendix 1 of this Submissions Report provides responses and additional information as appropriate to address each submission. Reference are provided to the submitting party.

Overland is pleased to provide this report to DPE on behalf of Plains SF No1 Pty Limited and looks forward to progressing the application for consent to develop, construct and operate this significant solar energy generation facility in New South Wales.

Sincerely



**Brett Thomas**  
Director, Plains SF No1 Pty Limited

# 1 RESPONSE TO GOVERNMENT AGENCY SUBMISSIONS

## 1.1 DEPARTMENT OF PRIMARY INDUSTRIES

<p>Clarification should be provided regarding the proposed works to extract and supply water to the site and any relevant impact assessment should be undertaken to ensure those works are addressed within the project approval.</p> <p>Section 6.9.3 of the EIS indicates the construction water demands are to be 50ML over a 12 month period. This is to be sourced from a combination of trucking to site for the potable water, and via the Murrumbidgee River for the remaining demands. Reference is made in the EIS to historic trading in this water source which indicates a viable option to acquire entitlement. However the works to supply this water have not been confirmed. These works need to be identified to ensure relevant impact assessments are completed within the SSD approval process and exemptions to approvals under the Water Management Act 2000 can apply.</p>	<p>Plains SF No1 Pty. Ltd is in discussions with the project landowner regarding drawing water from within the project footprint. The water works licence number is 40WA416947 and has more than sufficient capacity for the solar farm during construction and operations. Having the water supply drawn from site will negate the need for haulage and disturbances to the site.</p>
<p>Clarification should be provided that the solar panels can address the complying development impact assessment requirements of the Floodplain Management Plan for the Murrumbidgee River Hay to Maude.</p> <p>The desktop flood assessment has identified part of the site is mapped as Zone C under the Floodplain Management Plan for the Murrumbidgee River Hay to Maude, and the majority of the site is inundated in a 1 in 100 yr ARI event. The EIS states no infrastructure is proposed that would obstruct flow in the area mapped as Zone C. However from interpreting the map, Zone C does cover the northern part of the southern area of solar panels. It is therefore recommended clarification be provided that</p>	<p>Plains SF No1 Pty. Ltd has been in contact with the now department of Crown Lands &amp; Water (formally DPI Water).</p> <p>The desktop flood assessment conducted by independent hydrology experts at Jacobs Group (Australia) used a generalized polygon of the site extent which was then placed in reference to a traced area showing the Zone C Floodplain Management Area (FMA).</p> <p>During detailed design of the project layout following the receipt of planning consent, we will design the infrastructure to either avoid the Zone C area on the FMA or be designed to address;</p> <ul style="list-style-type: none"><li>• No blocking, impeding or diverting of the flooding regimes in Flood Dependent Ecosystems (FDEs) within the FMP floodwater network.</li><li>• No impeding the delivery of environmental water to ecological assets specified under the Lowbidgee Water</li></ul>

<p>the solar panels can address the complying development impact assessment requirements of the FMP.</p> <p>For infrastructure within Zone C of the Floodplain Management Plan to be complying development it needs to address the following:</p> <ul style="list-style-type: none"> <li>• No blocking, impeding or diverting of the flooding regimes in Flood Dependent Ecosystems (FDEs) within the FMP floodwater network.</li> <li>• No impeding the delivery of environmental water to ecological assets specified under the Lowbidgee Water Management Plan.</li> </ul> <p>At this stage there is uncertainty on potential measures to address flooding impacts at the site. As flood works may require an approval under the Water Management Act 2000, these should be assessed and included in the project approval.</p>	<p>Management Plan.</p>
<p>Any mitigating measure to obstruct or divert flood water should be assessed before project approval to ensure impacts are adequately assessed and considered as part of the project approval and within the requirements of the Floodplain Management Plan.</p>	<p>Plains SF No1 Pty. Ltd has been in contact with the now department of Crown Lands &amp; Water (formally DPI Water).</p> <p>Given the project has not entered the detailed design phase as yet, the detailed design of the project infrastructure will address mitigation measures to avoid obstruction or divert flood water.</p>
<p>Where the Transmission Line may cross the Travelling Stock Reserve (TSR 2686) it is advised that a Landowners Consent will be required prior to works and that a Licence or Easement will be required.</p>	<p>Crown Lands requires consent from Local Land Services ("LLS") and the Local Aboriginal Land Council (LALC)</p> <p>Plains SF No1 Pty. Ltd ave received LLS consent.</p> <p>We are awaiting and in discussions with Hay LALC and once Hay LALC consent is received we will submit the application to Crown Lands</p>

## 1.2 HAY SHIRE COUNCIL

<ol style="list-style-type: none"> <li>1. The applicant maintain Sidonia Road during construction and at completion of construction the road be reinstated by the applicant to its pre-existing condition.</li> <li>2. Council would prefer that any fencing be only 1.8m high as per its fencing policy.</li> <li>3. That the construction hours as per Section 3.5.5. of the EIS be noted in the approval.</li> <li>4. That the decommissioning as per Sections 3.7 and 6.5.4 be noted in the approval.</li> </ol>	<ol style="list-style-type: none"> <li>1. A dilapidation report will be prepared by a suitably qualified person prior to the commencement of construction so that on completion of the project's operational life, the road can be re-instated to its pre-existing condition.</li> <li>2. Fencing height will be determined during the detailed design phase, it will be between 1.8 and 2.4m high</li> <li>3. Noted</li> <li>4. Noted</li> </ol>
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## 1.3 FIRE & RESCUE NSW

<ol style="list-style-type: none"> <li>1. That a comprehensive ERP is developed for the site.</li> </ol>	Plains SF No1. Pty Ltd understands the requirements of this condition and will comply with it prior to the commencement of construction.
<ol style="list-style-type: none"> <li>2. That the ERP specifically addresses foreseeable on-site and off-site fire events and other emergency incidents, (e.g. fires involving solar panel arrays, bushfires in the immediate vicinity or potential hazmat incidents).</li> </ol>	Plains SF No1. Pty Ltd understands the requirements of this condition and will comply with it prior to the commencement of construction through the incorporation of the requested matters in the ERP.
<ol style="list-style-type: none"> <li>3. That the ERP detail the appropriate risk control measures that would need to be implemented in order to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards). Such measures would include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures, minimum evacuation zone distances and a safe method of shutting down and isolating the photovoltaic system (either in its entirety or partially, as determined by risk assessment).</li> </ol>	Plains SF No1. Pty Ltd understands the requirements of this condition and will comply with it prior to the commencement of construction through the incorporation of the requested matters in the ERP.

4. Other risk control measures that may need to be implemented in a fire emergency due to any unique hazards specific to the site should also be included in the ERP.	Plains SF No.1 Pty Ltd understands the requirements of this condition and will comply with it prior to the commencement of construction.
5. That two copies of the ERP (detailed in recommendation 1 above) be stored in a prominent 'Emergency Information Cabinet' which is located in a position directly adjacent to the site's main entry point/s.	Plains SF No1 Pty Ltd understands the requirements of this condition and will comply with it on commencement of construction and during the construction and operational phases of the project.
6. Once constructed and prior to operation, that the operator of the facility make contact with the relevant local emergency management committee (LEMC). The LEMC is a committee established by virtue of Section 28 of the State Emergency and Rescue Management Act 1989. LEMCs are required to be established so that emergency services organisations and other government agencies can proactively develop comprehensive inter agency local emergency procedures for significant hazardous sites within their particular local government area. The contact details of members of the LEMC can be obtained from the relevant local council.	Plains SF No.1 Pty Ltd understands the requirements of this condition and will comply with it prior to the commencement of construction.

#### 1.4 ROADS & MARITIME SERVICES

1. 1. A Traffic Management Plan shall be prepared in consultation with the relevant road authorities (Council and Roads and Maritime Services) to outline measures to manage traffic related issues associated with the development, particularly during the construction and decommission processes. The appointed transport contractor shall be involved in the preparation of this plan. The plan shall address all light and heavy traffic generation to the development site and detail the potential impacts associated with the development, the mitigation measures to be implemented, and the procedures to monitor and ensure compliance. This plan shall	Plains SF No1. Pty Ltd understands the requirements of this condition and will comply with it prior to the commencement of construction.
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<p>address, but not necessarily be limited to the following;</p> <ol style="list-style-type: none"> <li>2. I) Require that all vehicular access to the site be via the approved access route.</li> <li>3. ii) Details of traffic routes to be used by heavy and light vehicles, and any associated impacts and any road-specific mitigation measures.</li> <li>4. iii) Details of measures to be employed to ensure safety of road users and minimise potential conflict with project generated traffic</li> <li>5. iv) Proposed hours for construction activities, as night time construction presents additional traffic related issues to be considered.</li> <li>6. v) The management and coordination of the movement of vehicles for construction and worker related access to the site and to limit disruption to other motorists, emergency vehicles, school bus timetables and school zone operating times,</li> <li>7. vi) loads, weights and lengths of haulage and construction related vehicles and the number of movements of such vehicles,</li> <li>8. vii) procedures for informing the public where any road access will be restricted as a result of the project,</li> <li>9. viii) any proposed precautionary measures such as signage to warn road users such as motorists about the construction activities for the project,</li> <li>10. ix) a Driver Code of Conduct to address such items as; appropriate driver behavior including adherence to all traffic regulations and speed limits, safe overtaking and maintaining appropriate distances between vehicles, etc. and appropriate penalties for infringements of the Code,</li> <li>11. x) details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck</li> </ol>	
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movements to and from the site	
<p>2. Prior to the commencement of construction on-site, the Proponent must undertake all works to upgrade any road, its associated road reserve and any public infrastructure in that road reserve, to a standard suitable to meet any reasonable requirements that may be specified by the relevant roads authority. The design and specifications, and construction, of these works must be completed and certified by an appropriately qualified person to a standard to accommodate the traffic generated by the project. On Classified Roads the geometric road design and pavement design must be to the satisfaction of the Roads and Maritime Services.</p>	<p>Plains SF No1. Pty Ltd understands the requirements of this condition and will comply with it prior to the commencement of construction.</p>
<p>3. As a minimum the access driveway to the Mid Western Highway shall be constructed and maintained to the satisfaction of Roads and Maritime Services to provide the following:</p> <p>i) the required Safe Intersection Sight Distance (SISD) with a reaction time of 2.5 seconds in either direction in accordance with the Austroads Publications as amended by the supplements adopted by Roads and Maritime Services for the posted speed limit. Compliance with this requirement is to be certified by an appropriately qualified person prior to construction of the vehicular access.</p> <p>ii) Construction of a Basic Right Turn (BAR) and Basic Left Turn (BAL) intersection treatment in accordance with the Austroads Guide to Road Design as amended by the supplements adopted by Roads and Maritime Services for the posted speed limit on the Mid Western Highway. The intersection is to be constructed to the standards required for an approved road train route.</p> <p>iii) 2 way movement and be sealed for at least 20 metres from its intersection with the Mid Western Highway. The intersection shall be</p>	<p>Plains SF No1. Pty Ltd understands the requirements of this condition and will comply with it through design in accordance with Austroads publications, certification, construction and maintenance.</p>

<p>designed and constructed so that vehicles turning between the Mid Western Highway and the access road are not required to cross to the opposing travel lane in order to perform a turn manoeuvre.</p> <p>iv) No reduction in the capacity of the existing roadside drainage network and prevent water from proceeding onto, or ponding within, the carriageway of the Mid Western Highway. If a culvert is to be installed and is to be located within the required clear zone of the Mid Western Highway for the posted speed limit it is to be constructed with a traversable type headwall.</p>	
<p>4. A management plan to provide measures to suppress dust generation from the development site and the transportation route shall be prepared and implemented to the satisfaction of Council and Roads and Maritime Services.</p>	<p>Plains SF No1 Pty. Ltd understands the requirements of this condition and will comply with it prior to the commencement of construction.</p>
<p>5. No external lighting of any infrastructure associated with the project is permitted at night that may cause distraction to road users other than low intensity security lighting.</p>	<p>Plains SF No1 Pty. Ltd understands the requirements of this condition and will comply with it.</p>
<p>6. Glint and glare from the solar panels shall not cause a nuisance, distraction or hazard to the travelling public on the Mid Western Highway. In the event of glint or glare from the solar farm being evident, the proponent shall immediately implement glare mitigation measures such as construction of a barrier (e.g. fence) or other approved device to remove any nuisance, distraction and/or hazard caused as a result of glare from the solar panels.</p>	<p>Plains SF No1 Pty. Ltd understands the requirements of this condition and in the event of glint or glare from the solar plant being evident will comply and put in place mitigation measures to remove the nuisance, distraction and/or hazard.</p>
<p>7. A landscaped buffer (at least 5 metres in width planted with a variety of species endemic to the area and growing to a mature height ranging from 2 metres to at least 5 metres) shall be established and maintained</p>	<p>In the event of glint or glare from the solar farm being evident and resulting in distraction to the travelling public or as advised by Roads &amp; Maritime Services, Plains SF No1. Pty Ltd shall immediately implement glare mitigation measures such as construction of a barrier (e.g. fence) or other approved device to remove any nuisance,</p>



within the subject property along the frontages of the site to the Mid Western Highway to a standard to minimise distraction of the travelling public.	distraction and/or hazard caused as a result of glare from the solar panels.
8. All existing access driveways to the development site from the Mid Western Highway shall be removed, with the exception of the proposed access driveway, and any damage or disturbance to the road reserve of Mid Western Highway shall be restored to match surrounding landform in accordance with Council requirements.	Plains SF No1 Pty. Ltd understands the requirements of this condition and will comply with it during construction and operation of the project.
9. The Mid Western Highway is part of the State Road network. For works on the State Road network the developer is required to enter into a Works Authorisation Deed (WAD) with Roads and Maritime Services before finalising the design or undertaking any construction work within the carriageway. The Works Authorisation Deed documentation is to be submitted for each specific change to the state road network for assessment and approval by Roads and Maritime Services prior to commencement of any works within the road reserve. The applicant can contact the Land Use Manager, South West Region on Ph. 02 6923 6611 for further detail.	Plains SF No1 Pty. Ltd understands the requirements of this condition and will comply with it.
10. Any works within the road reserve of the Mid Western Highway requires approval under Section 138 of the Roads Act, 1993 from the road authority (Council) and concurrence from Roads and Maritime Services prior to commencement of any such works. The developer is responsible for all public utility adjustment/relocation works, necessitated by the development and as required by the various public utility authorities and/or their agents.	Plains SF No1 Pty. Ltd understands the requirements of this condition and will seek approvals prior to works and comply with the requirement for adjustment / relocation works.
11. All works associated with the project shall be at no cost to the Roads and Maritime Services.	Plains SF No1 Pty. Ltd understands the requirements of this condition and confirms that Roads and Maritime Services will not be responsible for costs associated with project works.

## 1.5 SPORTING SHOOTERS ASSOCIATION OF AUSTRALIA

Refer to submission	<p>Plains SF No1 Pty. Ltd acknowledges and thanks the Sporting Shooters Association of Australia (SSAA) for their submission. We are in discussions with both the local branch of the Association being the Hay Gun Club and with the SSAA Executive Director and gun range facility advisor in regard to part of the rifle range danger area, being outside boundary of the Hay Gun Club. The rifle range danger area falls on land that is proposed to be utilized for the solar farm and separately for the electrical connection easement.</p> <p>The operation of the rifle range requires that an agreement be in place between the rifle range / SSAA and the landowners of land designated within the gun club specified danger area. Plains SF No1. is working with both the SSAA and the Hay Gun Club and landowners of the defined danger zone area, both of whom are participants in the solar farm development, to assist in developing an outcome for the continued future use of the rifle range.</p>
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## 1.6 OFFICE OF ENVIRONMENT AND HERITAGE

<p>1. DPE to refer the proposal to WaterNSW.</p> <p>Approval of development in designated floodplains is the legislative responsibility of WaterNSW. They will need to determine whether this development represents a complying or non-complying work, and this will depend upon whether they are of the opinion that it blocks, impedes or diverts the flow path to the Flood Dependent Ecosystem that lies to the north west of the site.</p>	<p>Plains SF No1 Pty. Ltd has been in contact with the now department of Crown Lands &amp; Water (formally DPI Water) in regards to water flow path, please see responses to DPI.</p>
<p>2. The Biodiversity Offset Strategy (BOS) will be updated and revised based on the result of each step as the BOS is implemented. Amendments to the BOS must be agreed with OEH to make sure that the retirement of credits associated with this project are consistent with the NSW biodiversity offsets policy for major projects.</p>	<p>Plains SF No1 Pty. Ltd understands the requirements of this condition and will comply with it.</p>
<p>3. The EIS lists land management activities that will be included in a proposed environmental management strategy, without supplying</p>	<p>Plains SF No1 Pty. Ltd understands the requirements of this condition and will comply with it.</p>

<p>any details. 'Vegetation maintenance' is one of the land management activities that may impact on biodiversity. We have insufficient information to determine whether it includes removal or lopping of native vegetation, in addition to clearing identified as a requirement for construction.</p> <p><b>Recommended Conditions of Approval:</b></p> <p>Clearing of native vegetation not identified in the EIS is not permitted. Any clearing that is additional or different to that included in the Biodiversity Assessment Report must be assessed for biodiversity impacts and documented accordance with the Framework for Biodiversity Assessment.</p>	
<p>4. Mitigation and management actions have been listed on page 64 of the EIS. To ensure that these actions are carried out at the appropriate time, OEH request that the following details are supplied for each mitigation action:</p> <ul style="list-style-type: none"> <li>• who will be responsible for individual actions (including the position title of the officer responsible);</li> <li>• outcome or measure of success; and</li> <li>• when the action will be completed.</li> </ul> <p>These details should be completed before the start of construction to clearly identify the proponent's commitments for management and mitigation.</p> <p>OEH have noticed that Cultural Heritage and Environmental management plans have not been required by OPE for some recently approved developments. If conditions do not require the preparation of individual plans, OEH will need to see more detail for actions relating to biodiversity and Aboriginal cultural heritage</p>	<p>Plains SF No1 Pty. Ltd understands that a Cultural Heritage Management Plan (CHMP) will be required, this CHMP will detail the responsibilities of actions and mitigations.</p>

before the start of construction.	
<p>5. The Biodiversity Assessment Report (BAR) contains some minor issues that require clarification:</p> <p><u>Vegetation to be cleared</u></p> <p>The area of native vegetation to be completely removed is stated as both 0.95 and 0.96 hectares in different part of the BAR</p> <p><u>Low condition vegetation</u></p> <p>The inclusion of 0.01 ha of low condition PCT 15 with moderate-good condition PCT 15 is a departure from the FBA methodology. This needs to be acknowledged and the implication for credit requirements should be stated.</p> <p><u>Paddock trees</u></p> <p>Three paddock trees are proposed for removal within the development area. It should be clearly stated in the BAR to which vegetation zone these paddock trees have been assigned and clarified how this has been dealt with in the credit calculator.</p> <p><u>Timing of survey for threatened plants</u></p> <p>Table 12 states suitable habitat is present for Mossgiel Daisy, Slender Darling Pea and Winged Peppercress, and that these species were not recorded. Given that the transmission line route was surveyed in May which is outside of the spring/summer timing required for these species, it should be clearly stated in this table that the ground layer will not be impacted.</p> <p><u>Forest owls</u></p> <p>The justification for the reduction in the TS multiplier for Masked and Barking Owls is confusing. The publications cited are not included in the Reference list. This section needs to be reworded and details of the relevant supporting material provided.</p>	<p>Please refer to the updated 171027 - 24033.Hay.Sun.Farm.BAR.FIN03.20171025.pdf from Biosis.</p>

<p><u>Potential impacts on flood dependent ecosystems</u></p> <p>As noted under the comments on flooding above, the proposed development has the potential to alter the flow of water to the Flood Dependent Ecosystem (Black Box woodland wetland) located to the north west of the site. We consider that this potential impact on should be considered in the section 6.1 of the BAR.</p> <p><u>Plains Wanderer</u></p> <p>Table 11 states that there is suitable habitat for Plains Wanderer on the development site, but the rationale presented in the section 5.2.1 of the BAR states that there is not suitable habitat for this species on the site. Table 11 needs to be updated to reflect this, consistent with the credit calculator. We suggest a footnote to this line in the table will assist to avoid confusion.</p>	
<p>6. A Cultural Heritage Management Plan is required</p> <p>A Cultural Heritage Management Plan must be prepared to the satisfaction of OEH and the Registered Aboriginal Parties prior to construction commencing.</p>	<p>Plains SF No1. Pty Ltd understands the requirements of this condition and will comply with it prior to the commencement of construction.</p>
<p>7. Test excavations are required for sites HSF 1 and HSF 2, Pre-determination</p>	<p>Plains SF No1. Pty Ltd proposes to undertake test excavations pre construction rather than pre determination as during the detailed design phase there is an opportunity to potentially completely avoid HSF 1 &amp; HSF 2 which would negate the need to disturb these areas altogether. The current level of disturbance on HSF1 &amp; HSF2 is small in comparison to their overall size – if impact cannot be avoided test excavations will be undertaken prior to construction.</p>

## 1.7 DIVISION OF RESOURCES AND GEOSCIENCES

<p>The Division required the Proponent to assess the impact of the development on the existing land uses of the site, specifically Hydes Pit quarry. The Division has confirmed with the Proponent that the quarry is</p>	<p>Plains SF No1. Pty Ltd acknowledges and thanks the division of Resources and Geosciences for its response.</p>
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no longer in operation as the gravel resource has been exhausted. The Division did not recommend any additional requirements for the project in regard to mineral resources or exploration and mining titles. The Proponent has nonetheless reviewed the Division's online MINview database, noting the site is not subject to any mineral, petroleum or coal titles or applications	
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## 1.8 ENVIRONMENTAL PROTECTION AGENCY

<p>The EPA has responsibilities for pollution control and environmental management for scheduled activities under the Protection of the Environment Operations Act 1997. Based on the information provided the proposed activity is not a scheduled activity under the Protection of the Environment Operations Act 1997 and the proposed solar farm does not require an Environment Protection Licence.</p> <p>Under the Protection of the Environment Operations Act 1997 Hay Shire Council will be the Appropriate Regulatory Authority for pollution control and environmental management issues for this proposal should it be approved.</p> <p>On this basis the EPA has no further comments to make in relation to this proposal, and requires no further consultation in relation to this application.</p>	Plains SF No1. Pty Ltd acknowledges and thanks the Environmental Protection Agency for its response.
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## 2 RESPONSE TO PUBLIC SUBMISSIONS

### 2.1 ROBERT GIBSON

1. SIDONIA ROAD – I am a fifth generation farmer at “Croidon” and frequently have wet weather access issues on the Sidonia Road. I note	In addition to a dilapidation report being prepared by a suitably qualified person prior to the commencement of construction so that Sidonia Road can be re-instated to its pre-existing condition, the Traffic Management Plans
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<p>the construction of the project is anticipated to take 12 months. The road is single carriageway and gets very slippery after about 5 -10 mms of rain. I have had to attend with my tractor to recover vehicles that have slipped off the section of road that will be used by the Hay Solar Farm. The camber of the road corner makes it very dangerous in the wet. As my family and employees traverse that section of the road frequently, I am concerned for their safety where the project will result in an increase in heavy vehicle traffic on an unstable surface.</p> <p>I frequently have B double and Road train stock trucks entering and leaving the property, as well as wool trucks transporting my wool and I receive fodder and general farm merchandise on that road. As it is only single carriageway, any increased traffic is likely to result in the trucks having to pull over to the road shoulder which increases safety concerns as their loads will shift &amp; become unstable on the poorly formed road shoulders.</p> <p>It should also be noted that during shearing, where my shearing Contractors traverse the road multiple times, the road surface cracks up, blows dust and deteriorates to produce areas of "bull dust" which can be very unstable and also affects visibility if travelling at the speed limit of 100km/ hour.</p> <p>The kangaroo population living in the timbered areas next to Sidonia Road grazing on the road reserves is also a hazard which is magnified by the lack of a sealed surface due to increased stopping times and limited visibility when dusty.</p> <p>ACTION: The Sidonia road should be made dual carriageway and sealed up to and including the Northern project entrance.</p>	<p>required by RMS will detail the volume of construction traffic to be generated and provide suitable measures for mitigation and consultation with adjoining landowners.</p>
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<p>2. NORTHERN ACCESS – The proposed driveway on the Sidonia Road is located on a corner and directly intersects with my property entrance to "Croidon". I query whether the location is a safe one, given the amount of traffic expected to use it. I am also concerned that my access will be impeded when earthworks are conducted to upgrade the project entrance to handle heavy vehicles.</p> <p>ACTION: Consult with adjoining landowner on construction of entrance to prevent third party impacts. Consider sealing all entrances in that vicinity.</p>	<p>Plains SF No.1 Pty Ltd will consult with you and other directly affected users of Sidonia road to suitably address concerns.</p>
<p>3. AMENITY GLARE/GLINT/NIGHT LIGHTING – The proposed development will have solar panels pointing directly at my property as it lies to the North. Traffic coming to and from each of my farms will be impacted by the development and I will lose my "rural outlook" as there is presently no screening vegetation. I am also concerned about the impacts on my stock in the paddocks adjoining the project, especially during the construction phase. The stock are likely to avoid the area due to increased traffic, noise, vibration &amp; night lighting which will result in over grazing in other parts of the paddock and a decrease in stock welfare due to increased stress.</p> <p>ACTION: A belt of screen shrubs and trees should be established and maintained along the Eastern and Northern reaches of the project along Sidonia Road to reduce third party impacts.</p>	<p>Solar PV panels are designed to absorb rather than reflect light, the level of reflection is similar to typical rural infrastructure.</p> <p>The closest dwelling on the Croiden property is 4.5km away from the northern extent of the proposed solar farm therefore we do not believe screening is required.</p>
<p>FIRE – The asset protection zones for the project are located on the Eastern side of the development and have no regard for the prevailing wind in the area. My family farm has been burnt out twice, each time from the South/West. Accepted risk mitigation practice in our area is ploughing a firebreak as the high velocity of the winds make slashing a</p>	<p>The project will be designed to adequately address fire management in consultation with Fire and Rescue NSW.</p>



<p>poor management strategy. The project does not plan to have any firebreaks and the panels are planned to be located so close to the property boundary that there is no room for proper fire breaking within the property boundary. The project will create electric and magnetic fields (EMF's) and the plans fail to adequately mitigate the very real fire risk to my property. The EIS also indicated that water would be trucked in and stored on site. Given the scale of the project, I am concerned that the project has inadequate water arrangements to fight grass fires, which often have a front of several kilometres.</p> <p>ACTION: Require the project to install and maintain proper fire breaks in accordance with accepted farming practice in the area. Ensure adequate dedicated water storage available for fire fighting, given the site size.</p>	
<p>5. WATER – the Hay Private Irrigation District have provided a piped stock and domestic water connection to my property. The connection runs along the boundary of the project site and cuts under the Sidonia Road adjacent to the proposed Northern entrance. I rely on this source of water for my homestead, workers cottage, shearing shed and stock troughs. The project will have cable trenching equipment in use during construction and will be using fencing gear to create a high chain link fence along the property boundary.</p> <p>ACTION: Ensure erection of the project boundary fence and any alterations earthworks along Sidonia Road do not impede access to water for “Croidon” and to make good any damage immediately to prevent stock losses.</p>	<p>Fencing or other project infrastructure will be located within the project properties and will be designed to avoid existing underground assets.</p>