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Attention: Diana Mitchell
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Dear Mike

RE: Submission in Response to EIS on the Proposed Yarrabee Solar Farm - Application No SSD 9237

Narrandera Shire Council ('NSC') appreciates the opportunity to respond with comments on the EIS for the proposed 900 MW Yarrabee Solar Farm ('Project'), located 23km south-east of Narrandera.

Whilst there will be environmental and socio-economic advantages from the Project to Narrandera Local Government Area, there will also be various other consequences that NSC will be required to accommodate and manage.

At the forefront of NSC's approach to considering the proposed Project is the desire to ensure that socio-economic benefits flow to its residents and ratepayers and that environmental, social and economic costs are borne by Reach Solar Energy ('Proponent') rather than be transferred to the constituents of the shire.

NSC wishes to facilitate effective collaboration and dialogue with both the Proponent and the DPE so as to reach agreement on several key issues prior to the determination of the Development Application. These include, inter alia:

- a. Resolution of the scope, extent and funding of road upgrading works prior to construction of the Project; the ongoing repair and maintenance program for said roads across the whole district, including those in adjoining shires, during the phases of construction, operations and decommissioning; and
- b. That the Proponent makes fair and equitable annual financial contributions to NSC for public benefit purposes including road maintenance, environmental and community enhancement and recovery of Council project-related costs.

The submission below outlines the salient matters.

1. Cumulative Impact of Renewable Energy Projects in the Region

There is extensive, on-going planning and development of at least 20 solar farms, plus other major developments, occurring in the Riverina-Murray region. Some of the known projects are listed in Table 1.

Table 1: List of Solar Farms (SF) and Other Recent Major Developments in the Riverina-Murray Region

• Buronga SF • Limondale SF • Sunraysia SF • Sandigo SF (Narrandera) • Avonlie (Narrandera) • Yarrabee SF (Narrandera) • Hay SF • Finley SF • Hillston SF • Tarleigh Park SF • Coleambally SF	• Riverina SF • Mulwala SF • Yanco SF • Jindera SF • Darlington Pt SF • Sebastopol SF • Deniliquin Ethanol Plant • Currawarra SF • Griffith SF • Glenellen SF
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Table 1 highlights many like-minded projects and the likelihood that they may well be competing for resources and generating cumulative impacts. Cumulative impacts on the environment result from incremental impacts of the Yarrabee Project, when added to other recent, current and foreseeable future projects.

Cumulative impact issues include:

- the impact of the increased demand on the housing rental market caused by the construction workforce
- the increasing demand on limited resources in the local area, such as health and education services
- the impact on the region resulting from an increased demand for skilled labour

2. Roads and Traffic

The traffic and transport impact assessment is considered to be deficient in that the local road network in the Project area was not designed to accommodate so many heavy/large and light vehicles over such a long time period. The local roads in the main are narrow and rudimentary. Intersections are of a similar low standard, commensurate with the type and volume of local traffic.

Council requests that the Proponent engage with not only NSC, but also other adjoining councils whose roads will likely be impacted by the Project. It is important that all local roads in vicinity of the Project site are considered in totality. If a road is, or is not, upgraded that may well influence the Project's traffic flow patterns and could result in an unfair impost on one LGA to the benefit of the adjoining LGA.

It is understood from evaluating the EIS that each of the three construction stages (installing 300 MW each time) will have three phases therein. Each stage is expected to take about 18 months to build, resulting in approximately five years of construction activity.

NSC notes that the Traffic Impact Assessment excludes the impacts associated with decommissioning – 30-50 years hence – but indicates that such impacts can be assumed to be similar to the construction phase. NSC requires the decommissioning impact to be factored in as it is especially relevant, not only to road maintenance aspects, but also for workforce accommodation services.

To provide greater transparency regarding the traffic flows, rather than the average numbers across the three phases within each of the three construction stages, NSC requests a breakdown of heavy vehicle and light vehicle numbers for each of the three phases.

Council notes heavy vehicles are to enter and exit the site via the Western Access Route (via Main Canal Road); light vehicles and buses will access the site via the Eastern Access Route (via Back Morundah Road). It is also noted that there is restricted access for B-doubles on Main Canal Road and Old Morundah Road.

From our assessment of the data in the EIS it appears that the traffic types and volumes are as summarised in Table 2 below. If there are any errors or omissions please advise.

SUMMARY	No of vehicle Mvts
Heavy Vehicles = 9,500 trucks + 24,645 buses 6,276 B Doubles, 1,337 truck & dog, 906 semis, 702 waste trucks, 219 cement trucks, 60 low loaders and 24,645 buses	34,145
Light Vehicles = 15/day. But no private lights? Doubtful	30/day x 1,643 days = 49,290 + unknown privates
TOTAL MOVEMENTS	83,435 OF WHICH 41% ARE HEAVIES (+ more private lights??)
HEAVY VEHICLES	
Phase 1 (access & site clearance)	No of vehicle Mvts
30 low loaders	60
891 truck & dog	1,782
92 semis	160
Phase 2 (site compound)	
219 cement trucks	438
446 truck & dog	892
Phase 3 (elect equip)	
30 low loaders	60
6,276 B Doubles	12,552
814 semis	1,628
Other Heavies	
702 waste trucks	1,404
20 seater buses: says 15/day (x 1,643 days = 24,645 bus trips). Assumes 135 labourers/day	49,290
LIGHT VEHICLES	Predicts 49,276 movements
15 engineer/managers	30
What about other private light vehicles??	

With reference to light vehicles, aside from the 15 vehicles/day (30 movements/day) used by engineers/managers, it is unclear how many of the workers will use private vehicles as distinct from being transported by mini bus.

NSC also seeks a consent condition commitment to a robust and feasible worker bus transport system.

The EIS indicates that on-site parking will be provided for 100 vehicles. NSC queries the requirement for such a large car park. Is it due to an expectation that many workers will drive their own private vehicles?

Given is it intended for the Project life to be in the order of 30-50 years, clearly there will be periodic upgrades of the technology and equipment. NSC seeks advice from the Proponent as to the likely scope and frequency of such activities, given it will have significant implications on road wear and tear currently not canvassed in the EIS.

2.1 Road Upgrading prior to Construction Activity

Local roads to be impacted by Project-related traffic include Reas Lane, Back Morundah Road, Main Canal Road, Old Morundah Road, Browley Street, Yamma Road, Morundah Road.

Roads that lie within the Narrandera Shire Council and for which NSC is the roads authority are Reas Lane and Back Morundah Road.

Reas Lane and Back Morundah Road are sealed roads with varying quality of gravel substrate and seal, primarily designed to cater for low volume local traffic. It is considered there is a high likelihood this development will increase the deterioration rate of these roads that would not otherwise be expected.

Due to the use of Back Morundah Road by local traffic and its status as a school bus route, it is considered that a certain amount of upgrading work will be required prior to construction commencing. The following condition should be included in any approval:

- a. Prior to construction works commencing on the Project site, the proponent must undertake all works necessary to upgrade any road, its associated road reserve and any public infrastructure in that road reserve, to a standard suitable for use by heavy vehicles and special vehicles used during the construction phase and on-going operations of the solar farm. The design and specifications, and construction, of these works must be completed and certified by an appropriately qualified person and agreed to by the Road Authority (NSC). Pavement design shall meet minimum design requirements under Austroad's Guidelines and to the satisfaction of Council.

Aside from the above condition, as the local Roads Authority, NSC requires the Proponent to meet with Council as soon as possible to jointly develop a comprehensive road works program. The following conditions are to be added to any consent to complement any conditions already specified by RMS and form the basis (but do not limit) of the scope of a TMP:

Prior to the commencement of construction on site the proponent shall determine and finalise the preferred access route and include in any transport Management Plan (TPM):

- b. A detailed condition survey be undertaken (at Proponent's cost) of all local roads (including bridges, culverts, grids, etc.) complete with photographs, and agreement reached with NSC on the survey results.
- c. Agreement that on completion of Project construction, all local roads experiencing Project traffic will be reinstated to an equivalent or better condition than that found in the abovementioned condition survey (at Proponent's cost).
- d. Notification if any other local roads are to be trafficked by Project vehicles, with condition surveys completed beforehand.
- e. That during the construction phase, the Proponent maintains all local roads utilised by Project traffic in good condition to the satisfaction of NSC, thus providing safe, all-weather access. NSC requires three-monthly inspections of such roads with the Proponent and development of an intervention standard that details when maintenance will occur.
- f. Adequate advisory signage within road reserves to advise traffic of the route to be taken to access the development. Approval must be gained for the adequacy and intended location of such signage from NSC.
- g. That the Traffic Management Plan provides suitable strategies to safeguard the safety of school bus activity.
- h. That the Proponent provides NSC with details of all underground cable and overhead powerline locations and shows where they intersect road reserves prior to the commencement of construction. It will be necessary for NSC to approve all submitted details prior to construction.

- i. An agreement from the Proponent that if, during the life of the Project, NSC finds evidence of significant increases in traffic volumes or vehicle types on other roads in the locality not addressed in the EIS (or in the road condition survey) that can be directly attributable to the Project, the Proponent agrees to a negotiated settlement with NSC to provide additional funds for road repair, maintenance or any necessary upgrade works.
- j. A Road and Traffic Management Plan for the 12 months of decommissioning and that such a condition is included in any consent. NSC will require the provision of road condition and repair and maintenance arrangements similar to those during the construction phase.

2.2 Roads and Traffic during Operations

During the 30-50 years' operational life, local roads including Reas Lane and Back Morundah Road, and possibly other minor roads will be accessed by Project traffic.

As the local Roads Authority, NSC will require annual road maintenance contributions from the Proponent. Such contributions will be expected to commence on acceptance by NSC that the subject roads have been returned to, or exceed, the conditions found prior to construction, after completion of construction of each stage of the solar farm development. Roads maintenance contributions should be in the order of \$4,500/km/pa.

2.3 Roads and Traffic during Decommissioning

Because of the consequences for wear and tear on the local roads, NSC seeks details regarding the planned traffic flows during the decommissioning phase.

3. Water Supply

The EIS proposes the Project will require up to 750KL/day of non-potable water for each dry day of the construction works and 5ML/ year of non-potable water during the operation phase. The planned source of this water is yet to be finalized however; Council understands water is to be sourced from existing supplies/allocations that exist on Yarrabee Station.

4. Telecommunications

Mobile phone and internet services in the locality of the Project are quite poor. The influx of 150-450 workers during construction will place additional strain and demands on the existing services and adversely impact the existing service provided to the local community. NSC requests the Proponent liaise with mobile phone tower providers to secure an upgraded (if required) mobile phone and internet service prior to construction commencement.

5. Noise, Dust and Visual Impacts

NSC requests that the seven landholders living in close proximity to the Project are fully protected with respect to noise, dust and visual impacts. If there are any residences within 500m of an unsealed road used by Project traffic, NSC requires the road is to be sealed to a width of 6.0 m for a distance of 150 m either side of the midpoint of the house.

On the matter of glare, NSC needs to be assured that no resident living in proximity to the Project will be subjected to significant glare experiences.

6. Employment Matters

NSC is of the view that the EIS does not provide adequate consideration of the potential social and economic impacts of the development during the five year construction phase, especially in the light of the other major projects being developed in the region.

Also, NSC is committed to seeing projects such as this employ 'locals' to help build economic resilience in the predominantly rural community. To this end NSC seeks an up-front commitment from the Proponent and a condition on the consent regarding:

- a. The strategy to employ Narrandera 'locals' during the construction phase. Council wishes to see the Proponent commit to a strategy aiming at a minimum of 200 locals being hired during construction.
- b. The strategy of providing a number of apprenticeships/traineeships provided to Narrandera 'locals'. Council wishes to see the Proponent commit to or facilitating a minimum of 20 annual apprenticeships or traineeships during the five years of construction.
- c. The strategy to employ a number of Indigenous personnel. Council wishes to see the Proponent commit to employment of Indigenous personnel commensurate with the demographic makeup of our community. For example, Narrandera Shire has an Indigenous population of approximately 10% and this should be the percentage of Indigenous workers employed under point a. above.

7. Accommodation

The EIS acknowledges the construction workforce will generate pressure on local town accommodation and on Council's hard and soft infrastructure. NSC seeks more details from the Proponent regarding Project workforce planning, including accommodation and a strategy to deal with these issues.

8. Waste Management

The amount of waste predicted to be generated by the Project is understood to be approximately 8,000 tonnes, including 1,000 tonnes of waste timber pallets and 6,000 tonnes of earthen spoil. The EIS proposes to dispose of waste at the Wagga Wagga waste management facility. Has this arrangement been confirmed by Wagga Wagga Shire Council?

NSC's waste management facility is unlicensed and cannot receive more than 5,000 tonnes per annum. It also has limited scope and capacity, with a limited life. If the Proponent wishes to dispose of waste at the Narrandera facility, it will need to provide financial compensation to offset the increased consumption of airspace and upgrades required to meet licensing conditions if the 5000 tonnes per annum limit is exceeded. This would avoid such costs being transferred to residents and ratepayers when bringing forward waste facility expansions. NSC wishes to discuss this matter further with the Proponent.

9. Biosecurity

The site of the proposed Project farm is located at the gateway to the Murrumbidgee Irrigation Area, one of the most significant food bowls in the country. Biosecurity is an important issue. NSC anticipates that the vast majority of materials involved in the project will be imported from overseas and in very significant quantities. NSC requests that a condition of consent requires the Proponent to ensure that all inbound containerised material is certified as biosecurity safe.

10. Financial Contributions to Narrandera Shire Council

As the sphere of government directly responsible for the day-to-day governance of Narrandera EGA, the issues confronting NSC are significant, complex and diverse. Whether it be roads and bridges, water and sewerage systems, waste, community buildings, recreation facilities or social services, the availability and

quality of this infrastructure impacts on the standard of living and wellbeing of our residents and ratepayers.

Infrastructure provision, housing affordability, workforce skills and recruitment, social and cultural cohesion and amenity are just some of the challenges confronting Council as it seeks to channel the benefits arising from the renewable energy sector into community wellbeing and long-term sustainability.

NSC is keen to ensure it derives direct and appropriate financial recompense as regards the proposed Project, consistent with its needs to provide the social and hard infrastructure necessary to support all within the Shire – including itinerants – and to avoid the transfer of Project-related costs to local ratepayers.

NSC has had discussions with the Proponent with the aim of securing agreement on annual financial contributions to enable delivery of a broad public benefit and optimisation of a social licence. An upfront contribution of 0.1% of construction value per stage (approximately \$333,000 per stage, or \$1M over the three stages), plus an on-going community benefit fund to be jointly administered, has been proposed. NSC considers that the on-going community fund should be in the order of \$40,000 per annum over the life of the solar farm, commencing at the start of construction of stage one. The proponent has indicated they are supportive of a condition to support this approach being added to any development consent.

This issue is of great importance to NSC. It is Council's expectation that DPE will include a condition in the granting of any consent that requires this contribution, with agreement to be reached via a Voluntary Planning Agreement, or other similar mechanism, prior to development consent being granted.

11. Dialogue with DP&E as it Deliberates on the Project

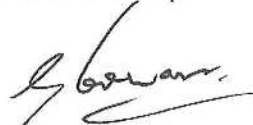
NSC seeks to maintain close dialogue with the Department of Planning & Environment as it deliberates on the proposed Project. To this end we request:

- Being notified when the Proponent's response to all submissions is available
- Receiving a copy of any Project-related correspondence or reports generated subsequent to receipt of submissions
- Receiving a copy of any draft consent conditions for comment at the same time that they are forwarded to the Proponent

As a key stakeholder, NSC wishes to be kept fully informed and engaged in the planning process for this Project.

If you have any queries regarding the abovementioned matters please don't hesitate to contact the undersigned.

Yours sincerely



George Cowan
General Manager

APPENDIX 1: LOCAL ROADS UPGRADE REQUIREMENTS

Considering the proposed Project will generate intense use of local roads during the approximately five years of construction, 30-50 years of operations and approximately 12 months of decommissioning, NSC as the Roads Authority for local roads requires the Proponent to fund and deliver the following:

A. Road Upgrades prior to Commencement of Construction

1. Upgrade of Back Morundah Road from the intersection of Reas Lane to 100m past the entrance of the solar farm:
 - Provide a minimum of 100mm compacted gravel (gravel to be minimum CBR 30 material)
 - Maintain 7m wide seal (currently 6m) with 1m gravel shoulder on either side
 - Provide a 20/14 seal
2. Reas Lane – Back Morundah intersection upgrade – BAR/BAL:
 - Design as per Austroad's standards for geometry
 - Provide a minimum 200mm compacted gravel depth (minimum CBR 30 material)
 - Provide a 20/14 seal
 - Line mark the BAR/BAL configuration up to 30m off the edge line of the road
3. Entry road to solar farm – Back Morundah road intersection – BAR/BAL
 - Design as per Austroad's standards for geometry
 - Provide a minimum 200mm compacted gravel depth (minimum CBR 30 material)
 - Provide a 20/14 seal
 - Line mark the BAR/BAL configuration up to 30m off the edge line of the road

B. Road Maintenance during the Construction Phase

Full payment of the repair and maintenance costs on those roads directly impacted by Project-related traffic in accordance with the agreed terms under any TMP.

C. Road Maintenance during the Operation Phase

Payment to NSC of \$60,000 per annum, plus CPI, for ongoing repair and maintenance costs.

D. Road Maintenance during the Decommissioning Phase

The TMP shall include the decommissioning phase of the project with, as a minimum, similar requirements as per the construction phase.