



Tarago and District Progress Association Incorporated

ABN: 20 532 382 103

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“Promoting the Social and Economic Development of Tarago Village and District”

20th June 2022

Mr Kurtis Wathen
Energy Assessments,
Development Assessment,
Department of Planning and Environment,
Locked Bag 5022, Parramatta NSW 2124

Dear Mr Wathen

RE: SSD-13166280 BLIND CREEK SOLAR FARM

References:

- A Blind Creek Solar Farm Pty Ltd / NGH Project Number: 20-403 Environmental Impact Assessment (and Appendices) dated May 2022
- B. Blind Creek Solar Farm Pty Ltd / NGH Project Number: 20-403 Scoping Study dated January 2021

This is the Tarago and District Progress Association Inc. (TADPAI) submission in response to Reference A.

Overview

The Tarago Community has no fundamental opposition to the proposed Blind Creek Solar Facility itself. The Tarago Community acknowledges that solar farms provide true and effective renewable electricity solutions with little to no pollution, and are strongly preferred over the use of ineffective, inefficient and polluting waste incineration solutions.

The above said, it is worthy of observation and comment that the multiple proponents wanting access to the Nations Electricity Grid is causing an over abundance of energy related State Significant Development (SSD) to be colocated next to high voltage power lines to maximise energy transfer and to minimise connection costs - the Australian and NSW Governments need to take ownership of this issue and provide better and more flexible access points in the future to avoid the clustering and corridors of renewable SSDs now starting to occur.

TADPAI notes that the Proponent proposes dual use of the land (solar farm and sheep grazing). The Proponent also advises: “*Additionally, the landholder is separately pursuing approval for a green-waste humus compost facility*” (Reference B, Page 11). TADPAI could not find on the maps and diagrams within Reference A the location of the ancillary equipment and facilities for sheep farming, nor the proposed location of the green-waste composting facility.



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TADPAI is aware of the broader debate surrounding the use of land by solar farming versus animal / crop farming. TADPAI believes that it would be in the proponents interests to provide more detail as to how the two forms of farming would coexist and what world best practices would be followed.

The above said, TADPAI is more interested in the proposed green-waste composting facility, and believes that along with itself, the Bungendore Community, would like to know more details in terms of what is proposed and how the composted outputs will be used. We are also keen to understand the odour implications from such a facility.

The Tarago Community is not directly affected by this proposed solar farm's operation, but the Minister for Planning needs to seriously consider the feedback provided by those individuals and communities directly affected by the solar farm's operation before reaching a decision to approve or not.

Electricity Pricing

The proposed Blind Creek Solar Farm, the proposed Gundary Solar Farm and all future solar farms should have a regulated pricing per MW based on initial investment, annual operating cost, decommissioning costs and reasonable return on investment, taking into account all Government investments and rebates. All of which are reasonably known across the facility's usable life upfront for the type of technology being used. At no stage should the pricing of electricity from this or any solar farm be linked to and calculated on market demand. It is not just renewable energy that is being sought, but these types of projects should be able to also provide long-term stable and consistent pricing.

Objection

The Tarago Community objects to Appendix K - Blind Creek Solar Farm Traffic Impact Assessment prepared by Amber dated April 2022. The sub-consultants have got it wrong and there is additional roadwork required to enable the findings and recommendations of this Assessment to be implemented. This Assessment needs to be re-done.

Neither the Proponent, consultant or any of the sub-consultants have contacted or communicated with the Tarago Community, this is unacceptable especially in light of the Blind Creek Solar Farm's impact on the Tarago Community during the facility's development / construction.

The approval of the 350 MW Blind Creek Solar Farm will be the tenth SSD facility requiring, accessing and using the Tarago-Bungendore Road. The other SSDs are:

- Holcim Bungendore Quarry,
- Bungendore Sands,
- Paragilli Sands,
- Capital Solar Farm,
- Capital Wind Farm,
- Woodlawn Wind Farm,
- Develop's Woodlawn Mine (previously Heron Resources),
- Veolia's Crisps Creek Intermodal, and



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- Veolia Woodlawn Eco Precinct (multiple SSDs and pending EIS for Energy from Waste proposal currently not endorsed or supported by the Tarago and surrounding Communities).

In addition to the above and within the Goulburn Mulwaree local government area:

- Hi Quality has two SSD facilities in the Tarago/Windellama localities,
- numerous quarries and two more proposed SSD quarries,
- other wind farms, and
- there is a proposed 440 MW Gundry Solar Farm to be sited on Windellama Road near the Goulburn Airport.

Braidwood Road forms part of the Goulburn to NSW South Coast (Batemans Bay) route, the Tarago-Bungendore Road forms part of the Canberra Region to NSW South Coast (Nowra) route, and the village of Tarago is sited on the intersection of these two routes. Braidwood Road is a State Road, and Tarago-Bungendore and Windellama Roads are Regional roads. Most of the working population of Tarago and surrounds travel the Tarago-Bungendore Road to and from work on a daily basis. And our roads are in disrepair with sections best described as unserviceable.

TADPAI believes that the Amber consultants reached the wrong findings and recommendations for the following reasons:

- Amber consultants did not consult with the TADPAI or the Goulburn Mulwaree Council;
- Amber has been selective in its description of the Tarago Road (Section 2.2) - the Tarago-Bungendore Road has narrow sections that are not designed and are poorly maintained for the heavy vehicles that use the road now, which now results in many near misses;
- Amber assumes that given the current use of the Tarago-Bungendore Road by heavy vehicles that it is therefore appropriate to allow more heavy vehicles - this road is not designed for use by modern heavy vehicles - case in point Hi Quality SSD licences forbid its heavy vehicles from using the Tarago-Bungendore Road;
- Amber used outdated 2008 vehicle data (Section 2.3) as its baseline data which does not take into account the changed nature of Veolia's Woodlawn operations and aspirations to increase regional waste volumes from 130,000 tpa to 200,000 tpa, and that in 2008 the tonnage of waste and gravel/sand being moved by road was minimal compared to today;
- in 2008, the road between the Canberra Region and the NSW South Coast (Nowra region) was gravel in many parts, today it is sealed all the way and the primary route between Canberra and Nowra;
- Amber's description of road use is wrong - morning traffic is heavy because of gravel trucks and waste trucks movements, and it is not uncommon to encounter up to 8 waste trucks and 8 gravel trucks on the Tarago-Bungendore Road in a journey before sunrise - a safety matter that the Veolia Community Liaison Committee has raised with Veolia;
- Amber identification that there is no public transport services (Section 2.4) is wrong - there are several school bus routes along the Tarago-Bungendore and Braidwood Roads, and there is a poorly sited bus stop on the corner of Braidwood Road and Wallace Street within Tarago;
- there are public schools in both Tarago and Tarranville, and along the approved heavy vehicle route through Goulburn;



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- notwithstanding that some bureaucrat has approved an articulated vehicle route through Tarago, the reality is that no articulated vehicle can turn legally and safely off Braidwood Road into Wallace Street, and vice versa;
- incidentally a new roundabout has been built on the Tarago-Bungendore Road at Elmsgrove that may prevent large oversize and B-double vehicles from accessing the site proposed for the Blind Creek Solar Farm from Bungendore;
- Amber has not identified the hill climb between Crisps Creek Intermodal and Collector Road on the Tarago-Bungendore Roads and associated issues and challenges;
- Amber does not appear to have identified all the accidents (Section 2.6) that have occurred on the Tarago-Bungendore and Braidwood Roads, and on the corner of Braidwood Road and Wallace Street;
- Section 3.1.1 is a throw away section - the reality based on first hand experience is that logistic trucks will seek to be on site at the start of days operations and therefore will travel to site outside of normal operating hours - this two way heavy vehicle pre-dawn traffic will increase the risk of accidents occurring during construction;
- oversize loads may need trees trimmed to allow travel along parts of the Tarago-Bungendore Road and within the village of Lake Bathurst;
- there are bridges with weight limits not addressed;
- Section 3.3 does not provide an accurate assessment on the condition of the Tarago-Bungendore Road;
- Section 3.4 is wrong - depending on EIS approvals and Develop's mine site reconstruction, it is possible that there will be three major constructions occurring and being supported by logistics delivered along Braidwood and Tarago-Bungendore Roads;
- Route Assessment (Section 4) is based on Blind Creek Solar Farm own needs, and with the potential for 13 plus SSD in the area, consideration should be given to Hume Highway and an on and off ramps to Windellama Road and the diverting of heavy traffic away from through Goulburn;
- Section 5 does not address vehicle turning on or off Braidwood Road within the village of Tarago;
- Section 5 does not address the frustration of faster light vehicles being stuck behind slow heavy vehicles climbing uphill from Crisps Creek Intermodal on the Tarago-Bungendore Road;
- Amber does not identify Veolia's \$3m contribution to the maintenance/upgrade of Tarago-Bungendore Road that is only now being started and the possible damage that its construction vehicles could do to the new road segment - who pays for any corrective work?; and
- I am sure that TADPAI has missed some issues.

Findings and Recommendations

TADPAI finds that Amber has developed and provided a generalist report favourable to the Blind Creek Solar Farm proposal but erroneous to the Tarago, Lake Bathurst, Tirrannaville and Goulburn Communities and other users of the Tarago-Bungendore and Braidwood Roads.

TADPAI strongly recommends that Appendix K - Blind Creek Solar Farm Traffic Impact Assessment be reworked and finalised before any approval is granted to proceed with the physical development and construction of the proposed Blind Creek Solar Farm. TADPAI believes that given the number of SSD facilities that are located along the Tarago-Bungendore Road, and within the Tarago/Windellama/Goulburn



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locality that this impact assessment should be undertaken with some urgency, by Transport for NSW and include and address the following:

- consultation with the Tarago, Windellama and Bungendore Communities, and the Goulburn Mulwaree Council and Queanbeyan Palerang Regional Council;
- contain realistic vehicle data based on recent baseline counts and consultation with the other SSD operators regarding current and future usage of Tarago-Bungendore and Braidwood Roads;
- identify NSW State Government obligations, responsibilities and infrastructure necessary to underpin the successful and safe operations and logistic support chain for the proposed Blind Creek Solar Farm and the other SSD operators identified within this Submission, which at minimum include:
 - ability for articulated vehicles to turn on and off Braidwood Road into Wallace Street and vice versa legally and safely, or alternate solution;
 - overtaking lanes where and as appropriate;
 - improvements to the roundabouts in Bungendore as appropriate;
 - on and off ramps on the Hume Highway onto Windellama Road;
 - the upgrading of Regional roads to State roads as appropriate;
 - appropriate road design standards that should be followed to accommodate traffic volumes and vehicle types; and
 - preliminary designs where appropriate; and
- strategies and plans for maintaining the local roads in good serviceable condition.

In addition to the above, no physical development and construction should occur at any of the SSD facilities until the key safety mitigations and improvements identified in the reworked traffic impact assessment have been built and implemented.

Any approval granted to Blind Creek Solar Farm should include the requirement for the company to rectify all roads damaged during construction within 6 months of completion of construction.

That as it is currently not possible for an articulated vehicle to legally and safely turn on and off Braidwood Road at Wallace Street within the village of Tarago that the following roads that Transport for NSW to immediately declassify as approved B-Double roads:

- Wallace Street,
- Goulburn Street,
- Tarago-Bungendore Road, and
- Collector Road.

These roads also need to be appropriately designed and built to accommodate heavy and oversized B-Double and other heavy vehicles, and slow moving trucks climbing the Tarago-Bungendore Road between Crisps Creek Intermodal and Collector Road. Once access and design have been addressed, the roads can be reclassified to accommodate the heavier vehicles.

The following roads and streets on the Canberra to South Coast (Nowra) route should be upgraded from being Regional Roads to being State Roads, and designed, upgraded and maintained by to meet the vehicle needs being used by the multiple SSDs within the Tarago locality and surrounds:

- Tarago-Bungendore Road,



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- Goulburn Street,
- Wallace Street,
- Lumley Road,
- Cullulla Road,
- Sandy Point Road, and
- Oallen Ford Road.

Neither TADPAI nor myself have made any reportable political donations in the last two years.

Yours Sincerely

A handwritten signature in blue ink, appearing to read "Adrian Ellson".

Adrian Ellson
President
TADPAI
0456 497 575

cc
Hon Sam Farraway MLC, Minister for Regional Transport and Roads
Hon Anthony Roberts MP, Minister for Planning and Homes
Hon Wendy Tuckerman MP, Member for Goulburn
Mrs Nicole Overall MP, Member for Monaro
Mayor Peter Walker, Goulburn Mulwaree Council
Mayor Kenrick Winchester, Queanbeyan-Palerang Regional Council
Australian Energy Market Operator