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Our Reference: OUT-5297/23

10 July 2023

NSW Department of Planning and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Attention: Kurtis Wathen

Dear Sir/Madam,

**Submission – Goulburn River Solar Farm - SSD-33964533**

Thank you for the opportunity to comment on the Environmental Impact Statement for the proposed Goulburn River Solar Farm.

It is understood the project involves the development of a 550 MW solar farm, battery energy storage and grid connection together with associated infrastructure.

Upper Hunter Shire Council (UHSC) is generally supportive of renewable energy projects and acknowledges that the project represents the potential for a significant investment into the region.

Council has reviewed the EIS and provides the following comments for the department's consideration:

**Voluntary Planning Agreement**

Council has accepted an offer from the applicant to enter into a planning agreement in respect of the Goulburn River Solar Farm whereby the applicant will be required to:

1. *pay an annual monetary contribution towards a community enhancement fund and a road maintenance fund of:*
  - (a) *\$346 (indexed to CPI) x the number of MW installed on the land as at the due date for payment; or*
  - (b) *\$190,000 (indexed to CPI), whichever is the greater, and*
2. *seal and widen 4.7km of unsealed road on Wollara Road up to the Goulburn River National Park boundary (valued at \$4.4 million).*

The offer is equivalent to 1.6% of the Capital Investment Value (CIV) of the project (\$750 million with a project life of 40 years).

The proposed contributions would provide a reasonable level of funding for the provision of public infrastructure and services that directly benefit the Upper Hunter Shire, specifically Merriwa and the surrounding area.

A draft planning agreement is currently being prepared and will be placed on public exhibition in the coming months.

**Traffic and Transport**

The project includes upgrades to the two water crossings on Ringwood Road at Bow River and Killoe Creek and the widening and sealing of a 1.8km section of Ringwood Road between Bow River and Killoe Creek. It is noted that Council supports these upgrades.

A large proportion of vehicles accessing the development, both during the construction and operational phases, will utilise the Golden Highway/ Ringwood Road intersection with heavy and oversize vehicles being limited to accessing the site via this intersection. As noted in the Turnbull Traffic and Transport Impact Assessment report, an assessment of the safe intersection sight distance (SISD) of the Golden Highway/ Ringwood Road intersection indicates that the intersection may not meet the SISD requirement of the *Guide to Road Design Part 3: Geometric Design (Austroads 2021)* given the existing horizontal alignment of the Golden Highway in both directions. Despite the non-compliant SISD, Section 3.2.6 of the report states:

*‘Given that warning signage notifying motorists on the Golden Highway that trucks are turning into and out of Ringwood Road is already installed near the intersection, no additional upgrades would be required. Notwithstanding, to further improve safety, temporary warning signage could be installed during the construction period, indicating that trucks would be turning at the intersection.’*

Council is concerned that the sight distances along the Golden Highway at the intersection are inadequate to enable vehicles associated with the project, particularly heavy vehicles, to safely negotiate the intersection. Whilst the sign-posted speed limit is 100km/h, vehicles are commonly observed exceeding this speed limit along the Golden Highway which would require an even greater SISD. The recommended temporary warning signage will do little to improve safety. Therefore, it is recommended that further investigations be undertaken into upgrading the intersection to improve safety including reviewing speed limits, installing additional warning signs, physical alterations to the intersection (eg. provision of turning lanes), removing roadside vegetation, widening of roadside cuttings or relocating the intersection to improve sight distances.

The assumption that light vehicle and shuttle bus trips will be evenly distributed on the road network, with equal proportions travelling to and from the site from the north and south during construction peak hour is unrealistic for the purpose of assessing intersection performance. It is likely that the majority of vehicles will be travelling between the site and the larger centres of Merriwa and Mudgee.

At this stage, there is considerable uncertainty regarding the accommodation arrangements for the construction workforce and where the workforce will be housed. This issue is relevant to the assessment of traffic impacts for the project as it could have significant implications for traffic volumes on particular roads and may impact intersection performance and road safety. Therefore, it is recommended that a revised traffic and transport impact assessment be submitted following the completion of a workforce and accommodation strategy.

The summary of crash data in the traffic and transport impact assessment shows that three crashes occurred near the Wollar Road/ Ringwood Road intersection between 2016 and 2020, resulting in moderate or serious injuries. It is recommended that an SISD assessment of the Wollar Road/ Ringwood Road intersection be carried out to ensure that it provides adequate sight distances in accordance with the *Guide to Road Design Part 3: Geometric Design (Austroads 2021)*.

### **Workforce Accommodation**

It is understood that the project is expected to generate an accommodation need for 350 workers at the peak of the project construction. This represents 36% of the total commercial accommodation rooms/ cabins within a 60 minute drive of the project area. Given the low vacancy rates of accommodation providers in the area and the increased demand from concurrent regional infrastructure projects and seasonal demands from tourists and agricultural and mining workers, there is likely to be insufficient accommodation available to accommodate the project workforce.

Whilst the EIS suggests that an Accommodation, Employment and Procurement Strategy would form part of pre-construction planning for the project, Council believes that a workforce and accommodation strategy should be prepared and submitted as part of the development application to ensure that the workforce can be accommodated and to enable the associated impacts to be assessed. The strategy should consider the cumulative demand for accommodation from all major infrastructure projects approved and planned in the area and provide a clear strategy for how and where the workforce will be housed. Once the strategy is developed, parts of the EIS may need to be updated (eg traffic and transport impact assessment) to provide a more accurate assessment of the impacts of the project.

The strategy should also provide further information on how local workers (35% of construction workforce) will be sourced given the low unemployment rates and current labour shortages in the region.

### **Bushfire Impacts**

The EIS notes that the project area is identified as bushfire prone land by the NSW Rural Fire Service bushfire prone land mapping. Whilst the land within the project area has been subject to extensive clearing associated with the historic agricultural land use, the property is surrounded by extensive vegetation associated with the Goulburn River National Park. There is a history of bushfires in this area and Council is concerned that the bushfire risk has not been adequately considered in the EIS. It is questionable whether the ten (10) metre Asset Protection Zone (APZ) around the perimeter of the development footprint is sufficient to limit the spread of bushfire and provide an adequate defensible space for firefighting. Furthermore, it is unclear if there is an adequate water supply available for bushfire protection as it is 'subject to availability'.

Further details regarding vegetation management are required to ensure that bushfire hazards are minimised. In addition, consideration should be given to the provision of a bushfire shelter in the event that roads are cut-off during a bushfire and workers are unable to evacuate the site.

### **Decommissioning**

The EIS notes that the project is expected to operate for 40 years or more after which the solar farm would either be decommissioned, removing all infrastructure, and returning the site to its existing pre-solar agricultural land capability, or repurposed with new PV equipment subject to additional technical feasibility and planning consents. Should the development application be approved, it is recommended that the developer be required to provide a bank guarantee to the consent authority in relation to decommissioning the solar farm and removal of all infrastructure. This would provide some level of security to ensure the site is not abandoned and left in a derelict state at the end of the asset's useful life.

We trust the above comments will be given due consideration by the department in its assessment of the proposed development.

Please do not hesitate to contact Mathew Pringle, Director Environmental & Community Services, should you have any questions regarding the content of this submission.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Greg McDonald', with a large, stylized loop at the end.

Greg McDonald  
**GENERAL MANAGER**