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Dear Iwan

**SUBJECT: LIGHTSOURCE DEVELOPMENT SERVICES AUSTRALIA
(LIGHTSOURCE BP) WEST WYALONG SOLAR FARM SSD 9504**

Thank you for the opportunity for Bland Shire Council to provide a submission on the proposal by Lightsource Development Services Australia (Lightsource BP) West Wyalong Solar Farm SSD 9504 (The Solar Farm).

As mentioned in the Lightsource BP Environmental Impact Statement (EIS), the EIS identifies and assesses the environmental issues associated with the construction and operation of a proposed 90 megawatt (MW) alternating current (AC) photovoltaic (PV) solar farm at West Wyalong (the proposal), central west New South Wales. The 562 hectare (ha) site comprised of a portion of Myers Lane, and Lot 17 and 18 DP753081 is located approximately 15.8 kilometres (km) north-east of West Wyalong.

Urbis Pty Ltd has prepared the EIS on behalf of the applicant Lightsource BP. The EIS has been prepared in accordance with Part 4 of Environmental Planning and Assessment Act 1979 (EP&A Act), Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation), and the Secretary's Environmental Assessment Requirements (SEARs) provided by NSW Department of Planning and Environment (DPE) dated 8 November 2018.

The proposal is a State significant development (SSD). Under Schedule 1, Part 20 of State Environmental Planning Policy (State and Regional Development) 2011 (S&R SEPP), solar electricity generating works with a capital investment value of more than \$30 million is declared to be State significant development. The proposal has an estimated capital investment value of \$136,660,000 and is classified as SSD.

Proposal Description

The proposal involves the construction, operation and eventual decommissioning a 90 MW AC solar farm located approximately 15.8kms north-east of the West Wyalong town centre on the south-east side of Blands Lane.

The solar farm infrastructure is located within the boundaries of a single property (Lot 18 in DP753081) currently used for agricultural purposes that is owned by one landholder. Site access will be provided via the northern boundary of adjacent Lot 17 to Blands Lane. The solar farm will connect via overhead or underground lines in Myers Lane to the existing 132kV overhead transmission line (Lake Cowal Mine to Temora to Wagga North).

The Applicant has secured a long-term lease of the site to enable the solar farm to operate for 30 years with an option for a further 10 years.

Construction:

- Up to approximately 300 construction workers at peak periods.
- Approximately 9-12 months for the construction timing of the proposal.

Operation:

- Approximately 296,000 photovoltaic (PV) modules (solar panel) mounted on single axis tracking framework.
- Fifteen power conversion stations containing electrical switchgear, centralised inverters and medium voltage transformers and 30 containerised lithium ion battery units located adjacent the internal access roads within the solar array area.
- Water tanks with a combined 45,000L capacity located within the north-eastern portion of the site in proximity to the site entrance.
- One Substation in the south-eastern portion of the site.
- One Customer Substation in the south-eastern portion of the site.
- The solar farm will connect via overhead or underground lines in Myers Lane to the existing 132kV overhead transmission line (Lake Cowal Mine to Temora to Wagga North).
- Two maintenance/storage sheds.
- One monitoring house.
- Internal access roads and access points.
- Security fencing around the perimeter of the solar farm.
- CCTV poles up to 2.5 metres high located along the perimeter of the site.
- Landscape screening at the site perimeter.
- Proposal lifecycle of approximately 30 years, with the option of a 10-year lease extension.

Decommissioning:

- Decommissioning timeline of approximately four months.
- Solar panels unscrewed from the mounting frames.
- Removal of horizontal mounting poles and piles from the ground.
- Removal of cabling from the ground within the site.
- Removal of substation, inverters, transformers, battery and switchgear cabinets / housing and transmission lines from the substation to the grid.
- Removal of fencing and CCTV equipment.

Proposal Benefits

The benefits of the proposal are as follow:

- Contributes to shifting energy sources to renewable energy that does not produce greenhouse gas emissions.
- Contributes to meeting Australia's commitments under National and International carbon reduction and renewable energy agreements.
- Contributes to energy security and reliability by providing a diverse energy source mix.
- Supports the development of the solar power and construction industries in Australia.
- Supports the local and regional economy through direct and indirect employment.

Local and regional development and employment

The Solar Farm would positively contribute to regional development, employment and economic benefits in the local region. Bland Shire LGA is referenced in the Riverina Murray Regional Plan (DP&E 2017), as an economy underpinned by agriculture and mining. However, the area has the capability to leverage opportunities from the shire's location to support diverse industries.

This is significant as population and economic fluctuations occur with the development of mineral and energy resources, some regional communities will need support to diversify and transition economies as the mineral extraction sector diminishes.

A peak period consisting of up to 300 employees on-site during the construction stage will contribute \$23 million GVA to the economy. This will support up to \$7 million in supply chain GVA across NSW.

Three direct ongoing jobs associated with the operational phase results in an additional five indirect supplychain jobs. Direct operational GVA of up to \$2.1 million, and indirect supply-chain GVA of \$0.5 million per annum supports supply chain businesses.

Construction of the proposal would require substantial capital investment and employment. This investment would sustain significant employment in the construction industry and have supply chain effects for the Bland Shire LGA and NSW economy.

Bland Shire Council

Bland Shire Council is fully supportive of the sustainable solar energy industry and Lightsource BP establishing The Solar Farm and have been engaged with Lightsource BP and the community from the inception of this project. Bland Shire Council acknowledges that there is broad public support for the adoption of alternative, renewable, low emission energy generation sources.

Bland Shire Council acknowledges the benefits of The Solar Farm at a local, regional and national scale. It is understood that the project will improve security of electricity supply, create employment opportunities and will contribute to the State and Federal Governments' targets for renewable energy and reduction of greenhouse gas emissions. The Solar Farm Project has the potential to inject millions of dollars into the Australian economy over its life time. Bland Shire Council anticipates that this economic injection may flow through to the local economy through the diversification of the local economy, the building of local skills, the use of local contractors and local services, particularly during the construction phase.

Noting the positive implications of The Solar Farm, Bland Shire Council also seeks to ensure that the project is constructed, operated and decommissioned in a way that any potential negative impacts on the local and wider communities are minimised.

Consultation

During the development of The Solar Farm, Lightsource BP has consulted with Bland Shire Council, the community and the immediate landholders with regards to The Solar Farm.

It is crucial that this consultation with Bland Shire Council, the community and landholders is maintained by Lightsource BP during the construction, operation and decommissioning of The Solar Farm.

Roads

The Lightsource BP West Wyalong Solar Farm (The Solar Farm) Environment Impact Statement (EIS) executive summary concluded that the construction of The Solar Farm would have no significant impacts on the local road network.

Conversely the Traffic Impact Assessment Report prepared by the Ason Group in the EIS concluded that the construction of the solar farm will generate a (relatively) significant level of traffic, including light vehicle trips, (staff) shuttle bus trips, and truck trips over a period estimated at 9 -12 months.

The Solar Farm site has frontage to Blands Lane to the north. Blands Lane connects to Bodells Lane to the east of the Site, and to Clear Ridge Road to west of the Site; both Bodells Lane and Clear Ridge Road in turn connect south to the Newell Highway.

The Ason Group Traffic Impact Assessment Report (AGTIAR) mentions:

- For all light vehicle, shuttle bus and truck trips to and from the east, which are expected to comprise the overwhelming majority of construction vehicle trips, a designated route via Newell Highway – Bodells Lane – Blands Lane (and vice versa).
- For light vehicle and shuttle bus trips to and from the south, which are expected to comprise a minority of construction vehicle trips, a route via Newell Highway (west) – Clear Ridge Road – Blands Lane (and vice versa).
- For truck trips to and from the south, which are expected to comprise a minority of heavy vehicle trips, a route via Newell Highway (south) – Showground Road – Compton Road - Central Road – Clear Ridge Road – Blands Lane (and vice versa). It is noted that the section of this route comprising Showground Road, Compton Road and Central Road is designated as the West Wyalong Heavy Vehicle Bypass.

The following table has been extracted from page 28 of the AGTIAR and demonstrates that there will be a significant increase in traffic movements on Clear Ridge Road, Bland Lane Bodells Lane:

Table 6: Solar Farm Construction Schedule

Construction Stage	Timeframe	Peak Daily Staff	Peak Daily Vehicles
Stage 1 Site Preparation & Earthworks	2 months	60 per day	10 light vehicles 4 shuttle buses 10 trucks
Stage 2 Solar Farm & Sub-Station Site Infrastructure Transport & Construction	3 - 4 months	300 per day	10 light vehicles 20 shuttle buses 25 trucks
Stage 3 Solar Farm & Sub-Station Construction	3 – 6 months	300 per day	10 light vehicles 20 shuttle buses 10 trucks

Source: Lightsource

Based on the above information and traffic movements, Bland Shire Council believes that there will be significant maintenance and rectification required during and after the construction and decommission stages of The Solar Farm on Clear Ridge Road, Bland Lane Bodells Lane and Lightsource BP must cover the costs for the maintenance and rectification work.

Visual Impacts and Screening

The Executive Summary of the EIS mentions that the visual impact assessment demonstrates that viewpoints that are representative of high sensitivity areas in the vicinity of the proposal are limited. The visual impact assessment also demonstrates that there are no sections of open views towards the proposal from publicly accessible foreground vantage points.

Overall, the landscape setting of The Solar Farm is generally flat with vegetation confined to a rectilinear pattern reflecting property boundaries and roads and more extensive natural patterns of vegetation following water courses. The highpoints of the surrounding State Forests are not readily accessible by the public and opportunities for overlooking are limited. Furthermore, the settlement area of West Wyalong and the watercourses are of such long distances from The Solar Farm that no views would be evident. Locally, within this predominate flat landscape, overlooking is not possible and even relatively low vegetation (up to eye-height) is effective at screening or filtering views. Most of these landscape character types are relatively isolated and it is unlikely that they would be frequently viewed from the surrounding landscape.

As mentioned above, the area is flat which would make it ideal for the installation of a viewing platform for the residents and tourists to view The Solar Farm.

Waste

The Executive Summary of the EIS mentions that based on the nature of the proposal and intended timeframes for the proposal lifecycle, Lightsource BP has provided waste management practices suitable for the management of waste generated during the construction and operation phases of the proposal.

The majority of waste generated during the construction and operation phases will either be reused or recycled however, if these two methods are not suitable then waste will be sent to landfill. A detailed breakdown of the waste management practices undertaken by Lightsource BP implemented and in operation on solar farms worldwide.

Based on the construction of other solar farms in the State, The Solar Farm will generate significant volumes of waste. The volume of waste that could be expected to be generated from the construction, operation and decommissioning of The Solar Farm would have a significant impact on the capacity of the landfills in the Bland Shire including the West Wyalong Landfill.

Bland Shire Council requests that a detailed Waste Management Plan be required as a condition of development consent and prepared by a suitably qualified person(s) and that the Waste Management Plan includes anticipated volumes and types of waste that will be generated by The Solar Farm.

Bland Shire Council has identified the West Wyalong Landfill site as the preferred option for the waste generated from the construction of The Solar Farm, but currently the West Wyalong Landfill does not have the capacity to receive waste from The Solar Farm as the current capacity is allocated for current and projected use by the residents of the Bland Shire. There is an opportunity for Lightsource BP to work with Bland Shire Council to expand this landfill to accommodate The Solar Farm waste.

Approvals from Bland Shire Council / Principal Certifying Authority

Construction certificate(s) will be required for the proposed works on site and more detailed plans will be required to determine if the following will need the consent of Bland Shire Council or a Principal Certifying Authority:

- The solar arrays and associated structures including the substation
- The proposed battery storage facility
- The amenity buildings on site
- The details of the potable water supply on the site during construction, operation and decommissioning
- The details of the onsite sewerage waste management system and the disposal of the effluent from the site during construction, operation and decommissioning

Fire Management

Due to the electrical hazards associated with large scale PV installations and the potential risk to the health and safety of firefighters, both FRNSW and the NSW Rural Fire Service must be able to implement effective and appropriate risk control measures when managing an emergency incident at the proposed site.

A fire management plan will be required and prepared by a suitably qualified person(s) for the control of fires at The Solar Farm including the battery storage area. Efficient access suitable for firefighting vehicles is required to be established and maintained over The Solar Farm site during the construction, operation and decommissioning.

Bland Shire Council would like to see water tanks installed solely for fire protection purposes and located adjacent to the site office. The tank will be located such that there is suitable all-weather access for the Rural Fire Service (RFS) fire tankers and appliances. A total minimum tank capacity

of 40,000 litres would be recommended. Equipment and facilities for a battery fire should also be included in the fire management plan.

Weed Management

The EIS mentions that the increased traffic and visitation within The Solar Farm Site may facilitate the spread of weeds that could further degrade native vegetation. The Solar Farm will require regular maintenance to control vegetation growth. Such maintenance will be undertaken either through the use of livestock (sheep) or by mowing with a slasher. The Solar Farm must be managed so as to minimise weeds on site and also for the containment and management of weed species. All noxious environmental weeds (particularly priority weeds listed under the NSW Biosecurity Act 2016) must be removed.

Feral Animals

The EIS the introduction of weeds and feral animals that could degrade and modify the habitat to be retained within The Solar Farm.

The Solar Farm must be managed to minimise all feral animals on site. The Riverina Regional Strategic Pest Animal Plan 2018-2023 is a good source of information.

Employment

The EIS mentions that during the peak construction period The Solar Farm is expected to create up to 300 jobs and up to three direct ongoing positions and five indirect supply chain positions when operational. Construction is expected to take approximately nine to twelve months and the project is expected to have a lifecycle of approximately 30 years.

Bland Shire Council would like to see local labourers, trades and services engaged with this project where possible and appropriate and that training and upskilling programs are offered to the local labourers, trades and services.

Accommodation for workers during construction, operation and decommissioning

The EIS mentions that it will be necessary to seek short-term accommodation for the proposal construction workforce beyond West Wyalong. Within an approximate 1-hour 45-minute drive time of the subject site there are approximately 1,293 rooms, of which 151 (12%) are located within West Wyalong.

There will be an increasing requirement for accommodation to be organised in the larger townships of Forbes, Cowra, Young and Parkes, with workers commuting to the proposal each day. Alternatively, private rental market accommodation options should also be considered.

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Bland Shire Council is aware that accommodation is extremely limited in the Bland Shire and the surrounding Local Government Areas as a result of:

- Evolution Cowal Gold Operations expansion
- Inland Rail
- Parkes Intermodal Terminal
- Solar Farms
- Clean TeQ Sunrise Operations
- Newell Highway projects
- Mineral Exploration Activities

Bland Shire Council would like to see Lightsource BP accommodate the 300 construction, operational and decommissioning workers in the Bland Shire in West Wyalong in new permanent affordable low cost accommodation properties.

Tourism

The EIS does not mention that the Solar Farm has the potential to create a local tourist attraction. Bland Shire Council would like to see Lightsource BP develop The Solar Farm as an education and tourism attraction. Suitable areas for tourist facilities including an elevated viewing platform, parking and signage should be considered in the development of the site.

Voluntary Planning Agreement / Proposed Community Fund

In accordance with Section 94A of the Environmental Planning and Assessment Act 1979 Bland Shire Council is open to contributions under a Voluntary Planning Agreement and 94A Contributions of 1% as this development is valued in excess of \$200,000.

The 94A contributions may be allocated to the following categories:

- Economic Development and Tourism
- Roads and Related Infrastructure including Signage
- Pedestrian and Cycling Infrastructure
- Stormwater Drainage
- Open Space and Recreation
- Civic and Community Facilities and Infrastructure

It is noted that the capital cost of The Solar Farm is approximately \$137 million and will engage a construction workforce of 300 for a period from nine to twelve months that will have a significant impact on infrastructure and facilities of the Bland Shire. Accordingly, Bland Shire Council believes that there should be a monetary contribution paid under a Voluntary Planning Agreement (VPA). Bland Shire Council would be happy to work with Lightsource BP to negotiate the VPA which may also include a community fund.

Project Decommissioning

At the end of the life of The Solar Farm, the site is to be reverted back to its former agricultural use. To ensure that the site is adequately decommissioned at the end of the lifespan of The Solar Farm, a Decommissioning Plan should be prepared in consultation with the landholder and Bland Shire Council as a condition of the consent.

As mentioned previously Bland Shire Council is fully supportive of the sustainable solar energy industry and Lightsource BP establishing The Solar Farm and should you have any further questions, please do not hesitate to contact either myself on (02) 6972 2266 or Jeff Stien on (02) 6979 0244.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ray Smith', with a stylized flourish at the end.

Ray Smith
General Manager