Our Ref: 5038



10 April 2018

Resource and Energy Assessments Planning Services Department of Planning and Environment GPO Box 39 SYDNEY NSW 2001

Attn: Tim Stuckey Tim.Stuckey@planning.nsw.gov.au

Dear Tim

## RE: STATE SIGNIFICANT DEVELOPMENT 8872 - PROPOSED SANDIGO SOLAR FARM

Council has reviewed the Environmental Impact Statement for the proposed solar farm project on Lots 55, 33, 35 DP754550, 174 Mitchells Road, Sandigo and provides the following comments for consideration and inclusion in any development consent.

Please contact Council's Development and Environment section by telephone 02 6959 5510 or via email <u>council@narrandera.nsw.gov.au</u> if you have any further enquiries regarding these matters.

Yours sincerely

Helen Ryan Manager Development and Environment

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# SSD 8872 Sandigo Solar Farm - 174 Mitchells Road, Sandigo

## 1. Primary Production Lands

The EIS states that the Sandigo Solar Farm is expected to operate for 40 years. The final proposal needs to consider how the development will maintain the viability of the land and its contribution to the agricultural production of the region. The EIS states that the proposed site is not considered state significant agricultural land; however the Department of Primary Industries mapping classifies the area as regionally important agricultural land.

The proposal would displace cropping at the site for the life of the solar farm. The EIS identifies that there may be an opportunity for grazing to occur on the site. Narrandera Shire Council (Council) supports any measures that contribute to maintaining the viability of the primary production land.

## 2. Access and Traffic

Mitchells Road, linking the development site to the Sturt Highway, is currently constructed to a gravel road standard. It is necessary for the proponent to upgrade the length of Mitchells Road to accommodate all traffic generated from the development, including construction traffic.

Mitchells Road is not approved as a Heavy Mass Limit (HML) route and the proponents would need to apply for approval for this level of access. The upgrade should meet the recommended AustRoads road design standards suitable for the proposed HML route, including sealing, potential widening, etc. The road upgrade works should be completed prior to construction of the facility.

The EIS indicates that the proponent will undertake a pre-construction condition audit of Mitchells Road, Boree Creek Road (referenced in the EIS as Kywong Boree Creek Road) and Kywong Road (referenced in the EIS as Kywong Faithfull Road). The standard of measurement should be undertaken using a Level 3 Road Safety Audit.

A post-construction Level 3 Road Safety Audit should also be undertaken, with the proponent required to return Mitchells Road, Boree Creek Road and Kywong Road to pre-construction condition.

All traffic movements, other than light vehicles, should be via the intersection of Sturt Highway and Mitchells Road. NSW Roads and Maritime Services should review the road intersection and advise any necessary upgrades.

## 3. Lot Reconfiguration

It is noted that the proposed lot configuration does not comply with the Narrandera Local Environmental Plan 2013. Council requires that no dwelling entitlement shall be attached to any newly created lots that are under the minimum lot size.

## 4. Construction Management

A construction management plan should be implemented as part of the proposed project. The plan should ensure that impacts on the community and public during construction are minimised and that work to the public road network as noted above is completed prior to commencement of any work on the site.

## 5. Accommodation for Workers during Construction

The proposal is expected to require 150 workers at the construction peak. Some detail should be provided in the Operation Environmental Management Plan in relation to how the proponent will handled accommodation requirements during peak tourism times.

## 6. Work within the Public Road Reserve

Any work within the public road reserve shall require approval from Council prior to commencement via a road opening permit.

#### 7. Disposal of Waste

It is noted that majority of waste generated during construction activities would be generally classified as general waste. The Narrandera Landfill is generally able to accept this type of waste.

## 8. Nuisance Glint and Glare

The EIS has stated that the risk of nuisance glint and glare is unlikely and screening has not been recommended as necessary. NSW Roads and Maritime Services should review the possible effects upon road users and advise any necessary action.

## 9. Voluntary Planning Agreement (VPA)

The EIS does not flag any significant contribution to the local area. Council's Section 94A Development Contribution Plan 2014 applies to the proposed site area and levies are payable at the rate of 1% of the proposed development cost.

Council acknowledges that, following the initial construction phase, there is likely to be a negligible impact upon public amenities and services. However, there is the initial impact of the construction period upon the road network and other public amenities and services. Given the scale of the project, Council suggests that a VPA should be considered to offset potential impacts.

## 10. Weeds and Pest Animals

The EIS states that the proposal has the potential for an increase in the spread of weeds and pest animals. The facility should be managed so as to minimise weeds and pest animals on site.

#### 11. Project Decommissioning

The EIS states that a Decommissioning Management Plan (DMP) would be prepared prior to the commencement of decommissioning activities. Decommissioning is required to be appropriately conditioned to ensure that it happens in a timely manner and the rehabilitation requirements and productivity targets for the re-establishment of agricultural production can be met.