



LAN900112

19 February 2021

NSW Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

**Attention: Javier Canon**

Dear Javier,

**RE: SSD-10452 – STUBBO SOLAR FARM**

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to provide input into the Environmental Impact Statement (EIS) for the proposed Stubbo Solar Farm (SSD-10452). Council has reviewed the EIS and would like to provide the following feedback for consideration.

**Traffic and Transport**

The EIS indicates that surveys to assess existing traffic movements during peak periods were carried out on one day. It is considered that the short duration of the traffic count survey data collection is insufficient to adequately assess the full impact of the proposed project. Council's general preference is to undertake surveys for a minimum of 7 days to obtain a more accurate indication of existing traffic movements along the proposed transport route. There is a risk that the existing traffic volumes may be underestimated for traffic management purposes.

A key concern for Council in relation to traffic movements is the significant increase in the number of vehicles utilising the local road network during the construction period. Council requests that a Construction Traffic Management Plan be prepared and approved by Council prior to the commencement of any construction activities.

The EIS indicates that the construction workforce would result in a maximum of 230 vehicles driving to/from the site each day. Council is concerned that the impact of increased vehicle numbers on the Gulgong township has not been adequately considered or addressed given only one intersection in the Gulgong township was considered one of the "seven key intersections" where traffic surveys were carried out.

If the assumption is that the majority of the construction workforce will travel from Mudgee to the site, Council's preference is that the construction workforce by-passes the Gulgong township. This can be achieved through the preparation of a Construction Traffic Management Plan, requiring workers to only use Castlereagh Highway, Fisher Street, Caledonian Street, Rouse Street, Cope Road and Blue Springs Road to access the site.

The Construction Traffic Management Plan should also include specific measures to ensure that no other local roads, in particular unsealed roads north of the site that provide connections to the Golden Highway, are used to access the site.

## **Road Upgrades**

The safety of all road users across the local network during construction and operation of the Stubbo Solar project is critical for Council. In this regard, based on the potential traffic impacts identified during construction (including increased vehicle numbers and potential damage to road infrastructure) and the reduction in the level of service on the road caused by platooning of construction traffic, Council requests the following improvements be made to the local traffic network prior to the commencement of any construction activities:

- a) The intersection of Cope Road and Blue Springs Road should be designed and constructed to comprise a full length Rural Channelised T-junction intersection with a passing lane and acceleration/deceleration lanes designed in accordance with the relevant parts of the current version of Austroads Guide to Road Design.
- b) Blue Springs Road from Cope Road up to and extending a minimum 100 metres beyond the Approved Access Point is required to be upgraded and widened to provide for no less than a 7 metre wide bitumen sealed pavement, with a 1 metre wide unsealed shoulder on each side.
- c) Barneys Reef Road and any other local road proposed to be used for heavy vehicle access to the site must also be upgraded and widened for the full trafficked length to provide for no less than a 7 metre wide bitumen sealed pavement, with a 1 metre wide unsealed shoulder on each side.
- d) Access to the site must be obtained using a suitably sized access crossover/intersection from Blue Springs Road situated at a location approved by Council that complies with and meets the requirements of Safe Intersection Sight Distances, provides for adequate turning paths for all construction vehicles, minimises removal of roadside vegetation and provides for adequate roadside drainage. The intersection must be sealed, line-marked and appropriate signage (Turning Traffic W5-25B, Watch for Turning Traffic W5-26C, or other approved) must be installed and maintained to the satisfaction of Council at all times.
- e) Any alternative Emergency only access point must also be constructed but may only be used in an emergency to provide access to the site. The Emergency access crossover must be situated at a location approved by Council that complies with and meets the requirements of Safe Intersection Sight Distances, provides for adequate turning paths for all construction vehicles, minimises removal of roadside vegetation and provides for adequate roadside drainage. The intersection must be sealed, line-marked and appropriate signage (Turning Traffic W5-25B, Watch for Turning Traffic W5-26C, or other approved) must be installed and maintained to the satisfaction of Council at all times.

Council requests that reports providing full and detailed assessments of the structural and load capacity of all bridges and culverts is provided to Council for approval on any and all proposed access routes to be used by Oversize/Overmass vehicles. Reports are to be prepared and certified by a suitably qualified bridge Engineer.

Council also requests that pre and post dilapidation reports are provided to manage the impacts of the Stubbo Solar Farm on existing road assets along the proposed transport routes (including all roads, bridges and causeways). The dilapidation reports should be undertaken by the proponent for each phase of the development (i.e. construction, operation, decommissioning). Any damage to existing road assets, should be repaired at the full cost of the developer.

## **Water**

The EIS estimates that the project will require 200 kilolitres of water per day during construction and decommissioning, primarily for dust suppression purposes. The three water supply options identified in the report include externally sourced from commercial suppliers, opportunistically sourced from farm dams located within the study area or sourced from town water.

The transportation of water to site will further increase traffic movements on the local road network during the construction and decommissioning phases. Council is concerned that the estimated 10 trucks per day is underestimated, given the extent of the internal road network and area disturbed for construction purposes, especially during extended dry periods. Council requests that the additional vehicle movements that are likely to be generated by water cartage activities are included in the traffic assessment and Construction Traffic Management Plan.

Water usage estimates should also make adequate provision for contingencies such as additional dust suppression requirements during extended dry periods. The recent drought has demonstrated water is a highly valuable resource and Council does not support any potential threat to the existing town water supplies or the amount of water available for rural property owners for domestic and agricultural purposes.

It is noted that Council's town water supply does not service the subject site.

## **Workforce and Accommodation**

The EIS acknowledges the expected strain the project will have on local accommodation. In order to minimise these impacts, it is requested that the proponent submit an Accommodation and Workforce Strategy considering the total accommodation required under various workforce scenarios, assuming the construction period overlaps with other major projects and considering peak tourism activity. It should also include detailed information regarding the number of beds and types of accommodation to be utilised on a monthly basis for the period of construction.

The Accommodation and Workforce Strategy should also outline the proponent's proposed strategy to maximise local employment opportunities during the construction phase. Council strongly encourages the proponent to employ as many locals as possible during the construction period. Not only will this maximise the local economic benefits of the project, but it will also alleviate pressures on accommodation availability.

The Accommodation and Workforce Strategy should be developed in consultation with Council and approved prior to the commencement of construction.

## **Waste**

Council requested as input to SEARs that the proponent provide specific details of the types of waste (including pallets, panels, steel piles, packaging and batteries), expected volumes and how the waste will be transported and disposed of during construction and decommissioning. In the absence of this detailed information, Council is unable to assess the suitability of waste that can be accepted at the Mudgee Waste Facility.

Council requests that the proponent provide a Waste Management Plan prior to construction and decommissioning, which details the types of waste (including pallets, panels, steel piles, packaging and batteries), expected volumes and the proposed method of disposal. A commercial waste agreement will likely be required.

The EIS has identified Gulgong and Kandos Waste Transfer Stations as possible sites for waste disposal. It is important to note that these waste facilities handle the disposal of domestic waste only, and are not equipped to accept the waste generated from commercial developments such as the Stubbo Solar project.

The EIS also states that the timber waste is recyclable. Based on Council's experience, the timber product is held together with glue products and often treated, and is therefore not suitable for recycling. Therefore, the timber is required to be disposed of in landfill.

### **Agriculture**

The EIS indicates that the entire study area of 1,772 hectares is currently utilised for agricultural production purposes including livestock grazing and cropping. The EIS anticipates that landholders would continue to use remaining portions of their properties for agricultural activities. Whilst the extent of these agricultural activities is unclear in the EIS, it is assumed that the remaining portions referred to are those not covered by the development footprint of 1,243 hectares.

As requested in Council's response to SEARs, an economic analysis should be provided to demonstrate the impact of removing valuable agricultural land and production activities from the local economy.

The EIS indicates that the subject site is classified Class 5 under the land and soil capability assessment scheme. It is important to note that as the Mid-Western Region has no Class 1 land and only a small amount of Class 2 land, classes 3-5 have greater agricultural value within the Region compared to other regions.

### **Removal of Vegetation**

Council requests that any clearing of vegetation required for the upgrade of Blue Springs Road be included in the BDAR and subsequent offset requirements.

### **Decommissioning and Rehabilitation**

Council requests that a decommissioning and site rehabilitation plan be submitted to Council for approval within 5 years of the commencement of operation. The plan should be reviewed every 5 years, so that it is readily available should operations cease earlier than planned.

A land management plan should demonstrate how the site will be maintained (including weed spraying, grazing and mowing) and how this will affect the land's capability to return to agricultural land upon decommissioning and rehabilitation of the site, with the primary issue being land contamination and soil degradation occurring as a result of continual pesticide applications. The proponent should demonstrate measures to stabilise the site when the infrastructure is removed, so it can be used again for agricultural purposes. This may include, but not limited to, the planting of paddock trees.

### **Developer Contributions**

Pursuant to the Mid-Western Regional Contributions Plan 2019, solar farms are subject to Section 7.12 contributions, calculated as per Table 6 at 1.0% of the total cost of development. Council requests that developer contributions are applied to the development in accordance with this plan and paid prior to construction commencement.

Alternatively, the proponent may negotiate a Voluntary Planning Agreement with Council, to make direct contributions to local infrastructure and services impacted by the development. It should be noted that Council expects that all road upgrades would be required as a condition of approval, and are not included in the VPA.

### **Bushfire**

An Emergency Plan should be prepared to respond to hazards such as bushfire. Given that surrounding land includes grassland and woodland vegetated areas, it is considered that there will be a need to construct a suitably sized permanent storage water supply to provide for fire-fighting purposes.

Prior to construction, a report must be prepared by a suitably qualified bushfire expert providing full details of proposed water storage requirements to provide for fire-fighting requirements. The report should include location and capacity of tanks, methods of pumping to provide sufficient pressures, and details of any proposed internal reticulation or hydrant network.

### **Community Consultation**

Council requests that community consultation is ongoing to ensure that the community has current and accurate information about the project and to provide feedback on the proposed project including traffic, construction or social impacts. It is recommended that a Community Hotline be established prior to the commencement of construction to manage any community enquiries or complaints.

Should you have any questions or wish to discuss the matters raised above in further detail, please contact Council on (02) 6378 2850.

Yours faithfully

A handwritten signature in black ink, appearing to be 'BRAD CAM', with a long horizontal stroke extending to the right.

BRAD CAM  
GENERAL MANAGER