

1 October 2019

Mr Rob Beckett
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Beckett

RE: State Significant Project – Comment Environmental Impact Statement – Silverleaf Solar Farm (SSD-9358) (Narrabri Shire)

Thank you for the opportunity to comment on the Environmental Impact Statement (EIS) for the proposed Silverleaf Solar Farm, SSD-9358, Narrabri Shire.

Hunter New England Population Health (HNEPH) has reviewed the Environmental Impact Statement concentrating on visual impact, water quality, noise, waste management and air quality.

The comments provided are contingent on confirmation by the NSW EPA that the methods employed to assess visual impact, water quality, noise and air quality are appropriate and should be considered in light of any methodological issues identified by the NSW EPA.

Water quality

The EIS indicates that construction water will be sourced from rainwater. All water requirements beyond what can be supplied by site water harvesting would be sourced from a town supply such as Narrabri (under a commercial arrangement) and would be trucked to site. The selected option for the provision of a private potable water supply is likely to require a Quality Assurance Program in accordance with the provisions of the Public Health Act 2010. The proponent is encouraged to contact Hunter New England Local Health District with respect to developing a Quality Assurance Program and water carter registration. Additional information can also be accessed through the NSW Health website via the following link:

<https://www.health.nsw.gov.au/environment/water/Pages/private-supplies.aspx>

Noise and vibration

The EIS proposes a Noise Management Plan as part of the Construction Environmental Management Plan (CEMP) that will be required as part of any permit. The proponent has provided noise modelling predictions and proposed noise monitoring and mitigation measures. Ongoing noise assessments will be undertaken in accordance with the Interim Construction Noise Guideline

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(Department of Environment Climate Change and Water 2009) by a suitably qualified person and all mitigation measures implemented accordingly.

The EIS proposes that “No vibratory rolling activities are expected within 100 metres of residential dwellings, hence no human comfort or cosmetic damage impacts would occur. No bored piling activities are expected within 4 metres of residential dwellings, no human comfort or cosmetic damage impacts would occur. Impact sheet piling works would not be undertaken within 175 metres of any off-site residences, and piles would be bored where feasible”.

HNEPH has no further comments provided the NSW EPA requirements are fully met.

Air Quality

The proposal has the potential to impact on air quality during construction by generating dust from excavation, vegetation clearance, construction vehicles driving over exposed soils or unsealed roads, and wind blowing over stockpiles and exposed surfaces. The EIS proposed that a CEMP would include measures to minimise impacts on air quality. Stockpiled materials would be covered, stabilised or stored in areas not subject to high wind. Maximum speed limits would be enforced for construction traffic within the site to limit dust generation. Use of a water tanker or similar to spray unpaved roads and exposed areas during construction where required. The proposal is unlikely to result in any substantial air quality impacts during operation.

HNEPH has no further comments provided the NSW EPA requirements are satisfied.

Waste management

Waste management including hazardous waste will be undertaken. A Waste Management Plan would be developed for the proposal and would form part of the CEMP. All waste would be transported and disposed of in accordance with the Waste Classification Guidelines (EPA 2014) and the Protection of the Environment Operations Act 1997. All fuels, chemicals, and liquids will be stored at least 50 metres away from waterways and will be stored in an impervious bunded area within the compound site. The refuelling of plant and maintenance of machinery will be undertaken in impervious bunded areas in the compound site. Vehicle wash downs and/or concrete truck washouts will be carried out within a designated bunded area on an impervious surface or carried out off-site. A site specific emergency spill plan would be developed, and include spill management measures including initial response and containment, notification of emergency services and relevant authorities by the relevant EPA guidelines. Vehicles will refuel in Narrabri.

Septic tanks are to be installed and operated in accordance with Narrabri Shire Council's requirements. A recycling program with Reclaim PV Recycling for old and damaged solar panels will be implemented. Other rubbish and contamination management protocols will be included in the Construction

Environmental Management Plan, Operations and Maintenance Plan and Decommissioning Plans will be developed for the project. HNEPH has no further comments provided the NSW EPA and Narrabri Shire Council requirements are complied with.

Community consultation

The EIS indicates that there has been an extensive consultation program and the proponent will continue to work proactively and productively with the receptors by keeping them informed about the construction schedule. Engagement with members of the community and interested stakeholders will be continued through ongoing liaison with the community and stakeholders, with sustained media coverage and outreach through mail outs within the proponent's Community and Stakeholder Engagement Strategy. A complaint handling procedure and register will be implemented to assist in recording and managing potential conflict with the local community during construction.

HNEPH has no further comment.

If you require further information, please contact Fidelis Jaravani, Environmental Health Officer on 67648020.

Yours sincerely



Professor David Durrheim
Director Health Protection
Hunter New England Population Health