



**Greater  
Hume  
Council**

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Mr Rob Beckett  
Environmental Assessment Officer  
Energy Assessments  
Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr Beckett

**Greater Hume Council Endorsed Submission to the Environmental Impact Statement (EIS) – Walla Walla Solar Farm**

I refer to the notice of exhibition of the EIS for the Wala Walla solar farm (proposed development) which was received by Council on 25 October 2019. It is advised that Council has reviewed the Environmental Impact Statement and at its November Ordinary meeting held on 20 November 2019 Council resolved to formally object to the proposed development for the following reasons:

**1 Reduced Levels of Amenity for Nearby Residents**

The EIS identifies that there are 4 uninvolved neighbouring properties that have residences or working land that will have a direct outlook onto the subject land. Council considers that residents from these properties will experience reduced amenity as the outlook from their property will change from being an agricultural landscape to one that is of an industrial appearance with a development footprint of 605 hectares. This footprint incorporates approximately 900,000 solar panels on tracker units, operation and maintenance buildings, access roads, inverter stations, high voltage substation and 2.4 metre high perimeter fencing. Council believes that the proposed landscaping will not provide a timely response to address the amenity loss of nearby receivers.

For one resident reduced amenity levels has the potential to have an adverse impact upon their business which is running a function centre. That business provides wedding packages and is a venue for other occasions. The business has been operating from the property for many years, enjoys good levels of patronage and is a going concern.

To provide a venue that can compete in a very competitive business environment the owners have invested significant funds into their business to provide an attractive venue. They recently have added tourist accommodation facilities and associated infrastructure.

It will be the construction period for the Walla Walla solar farm that will be the most detrimental to the function centre business as the transformation of the site will result in visual, noise and dust impacts. It is easy to envisage that such works will be off putting to potential clients who will want a high level of ambience for their event and potential clients will be lost to numerous competitors within the region whose venues will offer a more ambient setting. The operational phase of the Walla Walla solar farm will have

reduced impacts for nearby residents including the function centre however, it will be many years before proposed vegetation screening will be of a sufficient size to mask the appearance of the solar farm development.

## **2 Social, Environmental and Economic Impacts**

It would be an adverse social and economic outcome if the Walla Walla solar farm was detrimental to the function centre business as it provides employment for local people and is supported by other businesses including those involved in transportation and catering. The function centre provides some diversification for the broader local economy.

Council is concerned about the potential for the heat island effect to adversely impact upon localised climatic conditions and result in heat transmission out of the solar farm and into neighbouring properties. The EIS relies upon several studies that have been undertaken internationally to discuss the heat island effect caused by PV arrays however there is no cited Australian studies on the heat island effect. This is of concern to Council as it may not be appropriate to extrapolate the results of international studies on the heat island effect to localised conditions where this development is large, another nearby proposed development bigger again, there is receivers that are as close as 80 metres from the property boundary and the mean summer maximum temperature is 32.3°C.

The EIS should have discussed what mitigation measures, other than a setback and planting of a vegetation screen, that the proponent could take to minimise adverse outcomes caused by the heat island effect.

Council is concerned about the proposed development producing a dust nuisance during construction but particularly during its operational phase. The local area enjoys a reasonably high average rainfall and so it is not common for land in the vicinity of the proposed development to be devoid of vegetation. Consequently, nearby receptors currently do not experience any significant issues in relation to dust. Council believes that the use of tracking systems and efficient PV cells will dramatically reduce the amount of solar energy reaching the soil beneath the solar arrays and, over the thirty year life of the development, it could be increasingly difficult to maintain vegetation cover. Given the scale of the development site (605 hectares), there may be the potential for barren earth beneath solar arrays to be a significant source of dust for nearby receptors.

In a discussion on socioeconomic impacts arising from the Walla Walla solar farm the EIS mentions that benefits will arise to local farmers and the community who will benefit from an additional source of income that is independent of agriculture. During the construction phase the EIS indicates there will be 250 staff employed with many of these drawn from the local community. The EIS reveals that peak employment is for a period of time being 8-12 months with the numbers employed dramatically reducing outside of this period. It is felt that most of the benefits from the construction employment will not be able to be capitalised upon by the Walla Walla and Culcairn community as there is very limited temporary accommodation available. Workers will most likely be accommodated in the nearby regional centre of Albury/Wodonga. The EIS provides the impression that much of the equipment such as the PV cells, tracking arrays, inverter stations and are all to be purchased from the global market.

It is pleasing to note that employment and annual expenditure of the Walla Walla solar farm will be substantially larger than other similar developments that Council has reviewed with the operational period employment being 21 full time staff members consisting of 11 onsite, 5 in head office and 5 local contractors and projected annual expenditure of \$10 million dollars.

It is advised that the proponent has had minimal engagement with Council in relation to a payment to Council of a development contribution associated with the proposed development.

Since 2012 Greater Hume Council has had a shire wide fixed development consent levy either complying with Section 94A or its replacement Section 7.12 of the Environmental Planning and Assessment Act 1979.

Council has applied the provisions of its fixed development contribution plan on 283 occasions irrespective whether there is an impact of the development on local infrastructure with the funds being used for provision, extension, augmentation of public amenities and public services.

Given Greater Hume Council's long standing application of a fixed development contributions levy and the impact of the development on the local community, a failure by the proponent to pay a development contribution to Council that is commensurate with the current Greater Hume Council's Section 7.12 Development Contribution Plan 2019 would also be an adverse social outcome.

### **3 Loss of High Quality Agricultural Land**

Council has reviewed the Department of Planning, Industry and Environment's Large Solar Energy Guidelines in which there is a discussion about the importance of site selection. Agriculture is identified as a key site constraint and the guideline refers to land meeting the following:

*Important agricultural lands, including Biophysical Strategic Agricultural Land (BSAL), irrigated cropping land, and land and soil capability classes 1, 2 and 3. Consideration should also be given to any significant fragmentation or displacement of existing agricultural industries and any cumulative impacts of multiple developments.*

The EIS indicates that the proposal is located on soil capability Class 4 and Class 6 land. The current use of the land comprises sheep and cattle farming. Intermittently, the main subject land is also used for canola and wheat crops. There is no figure provided in the EIS that indicates the footprint of the development in relation to the respective soil classes. It is noted that DPI Agriculture commented through the SEARS that *"although the development is proposed for Class 4 and 6 land as assessed under the Land and Soil Capability Assessment scheme, the class 4 lands in this area are currently under review due to their value as high quality cropping farms."*

Inspections by Council of the development site and adjacent land would indicate that it is high quality agricultural land. Council has been advised that this land will be mapped as important agricultural land under the Riverina Murray Draft Important Agricultural Land Mapping project which also indicates it is high quality agricultural land. Due to its impending status as important agricultural land, the site could be considered constrained under the Department of Planning, Industry and Environment's Large Solar Energy Guidelines.

The EIS indicates that existing native and exotic pastures will initially decline due to shading following PV array installation. There is a concern raised by Council that these effects maybe ongoing and the land may not benefit from thirty years of being beneath highly efficient photovoltaic cells mounted upon tracking units and indeed, may deteriorate if the vegetation is not able to be supported in this environment.

Due to the loss of the high quality agricultural land Council believes that the proposed development may not be compatible with the RU1 zone objectives contained in the Greater Hume Local Environment Plan 2012 which are:

- To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.
- To minimise the fragmentation and alienation of resource lands.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.
- To maintain the rural landscape character of the land.

#### **4 Impacts on Native Vegetation and Aboriginal Heritage**

The EIS has undertaken very detailed studies concerning the biodiversity impacts and impacts on Aboriginal cultural heritage that will occur if the proposed development does proceed. Whilst Council is satisfied with the rigour of the assessment of these impacts, it is very concerned about the effect of the removal of 13.83 hectares of native vegetation, 53 paddock trees and a total loss of value of 24 items of Aboriginal cultural heritage.


Council's engineers have reviewed the Traffic Impact Statement contained within the EIS and they raise concerns that the unsealed portion of Benambra Road will be utilised to some degree during the construction of the facility. They believe that sealing of the Benambra Road to Schneiders Road at the full cost of the proponent should be considered.

The following traffic related recommended conditions are provided in the event of the approval of this application:

- Road works are to be undertaken in accordance with the submitted traffic assessment.
- For assessment by Council additional design plans are required for the access points from Benambra Road and across Schneiders Road.
- Under Section 138 of the Roads Act 1993 any works occurring within the road reserve require the consent of Council as the road authority.

Should you require further information please contact Colin Kane, Director Environment & Planning, on 6044 8928 or email [ckane@greaterhume.nsw.gov.au](mailto:ckane@greaterhume.nsw.gov.au).

Yours faithfully



Colin Kane  
**Director Environment & Planning**  
GREATER HUME COUNCIL

22 November 2019

Our Ref: CK:SG