



Greater
Hume
Council

All correspondence
PO Box 99 Holbrook NSW 2644

P 02 6036 0100 or 1300 653 538
E mail@greaterhume.nsw.gov.au
greaterhume.nsw.gov.au

ABN 44 970 341 154

Elisha Dunn
Environmental Assessment Officer
Energy Assessments
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Dunn

Greater Hume Council Endorsed Submission to the Environmental Impact Statement (EIS) – Culcairn Solar Farm (SSD 10288)

I refer to the Notice of Exhibition of the EIS for the Culcairn solar farm (proposed development) which was received by Council on 24 January 2020. It is advised that Council has reviewed the Environmental Impact Statement and at its February Ordinary meeting held on 19 February 2020 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 9 neighbouring properties that have residences that will have either broken views or unbroken views 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 1,317 hectares. This footprint incorporates approximately 1,100,000 solar panels on tracker units, operation and maintenance buildings, access roads, inverter stations, high voltage substation, Battery Energy Storage System and 2.4 metre high perimeter fencing.

One residence (R14) will initially be subjected to a high inherent visual impact which will reduce to medium visual impact through the mitigation measure of vegetative screening. Council is concerned that it will take many years for the proposed vegetation to be of a sufficient size to mask the appearance of the solar farm and considers that alternatives to mask the view of the development from this residence should be investigated.

Council also raises concerns in relation to residential receiver R17 which will have a broken view of the southern section of the Culcairn solar farm as well as a view of proposed Walla Walla solar farm.

2. Social, Environmental and Economic Impacts

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 adjacent solar farm may exist, there are receivers that are as close as 121 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 (1,317 hectares), there may be the potential for barren earth beneath solar arrays to be a significant source of dust for nearby receptors.

The EIS effectively explains the social and economic benefits of the proposal which includes a discussion on how 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 500 staff employed with many of these drawn from the local community. The EIS reveals that peak employment is for a period of time being 12 months with the numbers employed reducing outside of this period.

Despite the company espousing a commitment to where ever possible procure from the local economy, 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.

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. Consequently Council is pleased to note that the EIS provided details of a community benefit sharing program that is financially commensurate with the contribution that would arise from a shire wide fixed development consent levy.

Council believes that the Council Contribution should be paid in a shorter period of time and the community benefit fund should be incorporated as part of the voluntary planning agreement that is referenced within the development consent and registered on the titles of the subject land.

1. 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 proposal is located on soil capability Class 4 and is used for a range of crops and pastures. 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 there will be benefits for the soils as the proposed development will provide the opportunity for the land to be rested and there will be an encouragement in allowing the growth of diversity in groundcover and perennial species. There is a concern raised by Council that 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.

The EIS indicates that underground cabling is proposed to be left insitu when the proposed development is to be decommissioned which does not align with the comments from DPI agriculture which states: *"NSW DPI Agriculture notes that the land that is proposed to be the site for this development has been used in the past for grazing and cropping with cultivation occurring on occasion and the intention is that the land will be returned back to agriculture once the solar farm is decommissioned. DPI Agriculture notes and supports the proponent's commitment to the removal of all above and below ground infrastructure once the solar farm is decommissioned so that the land can be returned to agricultural production."* Council is of the opinion that it should be a requirement that the cabling would be removed.

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. Concerns in Relation to the Bushfire Risk Posed by the Development

Local residents have raised concerns to Council about the bushfire risk posed by large scale solar farms such as the proposed development. Whilst the EIS does review the risks posed by bushfire and other sources of fire, it does not do so in the context of responding to comments provided by the NSW Rural Fire Service as part of the Secretary's Environmental Assessment Requirements (SEARS). Council believes that the importance of addressing the bushfire fire risk warrants ascertaining the NSW Rural Fire Service's comments prior to the application being determined.

5. 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 does believe that the removal .61 hectares of native vegetation, 99 paddock trees and a total loss of value of 39 items of Aboriginal cultural heritage demonstrates the constrained nature of the site of the proposed development.

Council's engineers have reviewed the Traffic Impact Statement contained within the EIS and provided the following recommend conditions in the event of the approval of this application:

- At the full cost of the proponent Weeamera Road (north of the Boral Quarry) to the property access be constructed to Council's 'Standard Road Design Typical Cross Section' Specification – 7 metre pavement seal and 9 metre road formation (see attached pdf).
- Prepare a traffic management plan.
- For assessment by Council additional design plans are required for the access points from Cummings Road and Weemera 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.

It is also advised that Council has resolved that in the event of the approval of this application that the following matters should be included as conditions of consent:

- Advanced screening species of two to three year old trees shall be utilised.
- For the period of 1 December to 31 March – a fire unit will be manned onsite with three people to operate a fire tanker.
- A 12 month weed control plan will be prepared and signed off by 2 agronomists.

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

Yours faithfully



Colin Kane
Director Environment & Planning
GREATER HUME COUNCIL

20 February 2020

Our Ref: CK:SG