



MID-WESTERN REGIONAL COUNCIL

PO Box 156, MUDGEE NSW 2850

86 Market Street, Mudgee | 109 Herbert Street, Gulgong | 77 Louee Street, Rylstone

T 1300 765 002 or 02 6378 2850 | F 02 6378 2815

E council@midwestern.nsw.gov.au

JR | LAN900078

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

Dear Diana

SUBJECT: BERYL SOLAR FARM (SSD 8183)

Thank you for the opportunity to provide comments on the proposal for the development of the Beryl Solar Farm (SSD 8183).

Council considered a report on the Beryl Solar Farm (SSD 8183) at its 17 May 2017 meeting. Prior to the commencement of the Council meeting, a number of local residents made representations to Council during the Open Day session. These concerns are reflected in the feedback provided below.

In summary, the main issues which Council would like to provide feedback on include: community consultation, traffic and transport, visual, noise, aboriginal heritage impacts and activities within the R5 zone.

COMMUNITY CONSULTATION

The EIS provides details of the community consultation undertaken by First Solar in developing the proposal for the Beryl Solar Farm. A Community Consultation Plan has been developed and whilst Council acknowledges the consultation that First Solar has undertaken to date, the representations made to Council are that some neighbouring land owners have had minimal consultation and are uncertain about the specific details of the project and how it will impact them.

It is critical that community consultation is maintained on an ongoing basis and throughout each phase of the project with all stakeholders, particularly those community members within close proximity to the proposed site who have raised concerns regarding traffic impacts, potential decline in land value, visual impacts and understanding of the project approval process. It is important that First Solar continues to monitor and respond promptly to all community enquiries and maintain open and transparent communications in relating to these concerns.

TRAFFIC AND TRANSPORT

The EIS indicates that any traffic and haulage impacts on Beryl Road and the Castlereagh Highway would be managed in consultation with the relevant traffic authority (RMS and Council) covering issues such as, but not limited to, reinstatement of pre-existing road conditions, shuttle bus transport, intersection upgrades, scheduling of deliveries and traffic controls. A detailed Haulage Plan, Traffic Management Plan and Road Dilapidation Report are all to be developed in consultation with RMS and Council.

Council agrees with the approach to utilise pre and post dilapidation reports to manage the impacts of the Beryl Solar Farm on existing road assets. The dilapidation reports should be undertaken by First Solar at each phase of the development (ie. construction, operation, decommissioning).

The EIS does not anticipate any road upgrades to Beryl Road. However, based on the potential impacts identified in the EIS during construction (including increased vehicle numbers, increased collision risk, damage to road infrastructure, disruption to existing services (such as school buses) and reduction in the level of service on the road caused by platooning of construction traffic, Council requests the following improvements to Beryl Road:

1. Additional Seal Width on Shoulders

Council requests additional seal width (1.0 metre) on the road shoulders. The current shoulder seal width is 0.5 metres on each side and the recommendation is to extend the seal width to 1.5 metres on each side.

2. Line-Marking

Council requests line-marking both on the centre line and edge lines to improve road safety. There is no line-marking currently.

The above improvements are justified due to the significant increase in heavy combination (HC) vehicles during construction (ie. an additional 6,150 HC vehicles). It is estimated that the additional HC vehicles will generate 27% of total traffic movements on Beryl Road. HC vehicles cause significant damage when they run close to the edge of the seal resulting in drop offs which are a serious safety hazard.

VISUAL IMPACTS

The EIS includes general measures to address identified visual impacts, including onsite vegetation screening, general design measures to reduce visual contrast, maintaining ground cover beneath panels and a process to verify the actual visual impacts of the proposal.

Based on the representations made to Council, the visual impacts are a serious concern for neighbouring land owners given the large scale of the project. Council strongly supports the inclusion of relevant conditions which ensure that additional screening on the site's northern boundary and north-east corner is provided as recommended in the EIS. First Solar should also ensure that all impacted land owners have the opportunity to participate and provide feedback during the development of a Visual Impact Management Plan for the project to minimise visual impacts and address concerns for their specific properties.

NOISE IMPACTS

The EIS identifies the possibility of noise exceedances at 5 out of 10 receiver locations during construction of the Beryl Solar Farm.

Whilst noise control solutions have been included to minimise these impacts, it is essential that First Solar communicates with all impacted land owners throughout the construction period to ensure all exceedances are managed appropriately and effectively. All impacted land owners should have the opportunity to participate and provide feedback during the development of a Construction Noise Management Plan for the project to minimise noise impacts. Where noise level exceedances cannot be avoided during construction, relevant conditions should be included to restrict the noise to certain time periods and provide regular breaks for residents from “noisy activities”.

The noise modelling presented in the EIS concludes that predicted operational noise levels comply with the nominated criteria under all scenarios and meteorological conditions. However, based on the representations made to Council, neighbouring land owners are concerned about the ongoing noise from tracker motors and inverters, the cumulative impacts of this equipment and how noise will be managed by First Solar if it exceeds the predicted noise levels included in the EIS. Council strongly supports the inclusion of relevant conditions to both monitor and report noise generating activities during operations, which includes thresholds for shutting down powered equipment where it does not comply with noise criteria.

ABORIGINAL HERITAGE

Whilst the EIS indicates that consultation with Aboriginal groups was undertaken, it is noted that a section of the Aboriginal and Heritage Assessment is incomplete (Appendix E page 6 Aboriginal Community Feedback).

It is recommended that feedback from Aboriginal groups is recorded regarding the proposed relocation of artefacts, and that First Solar prepare an Unexpected Finds Protocol to address the potential for finding unexpected Aboriginal artefacts during the construction and operation of the solar farm.

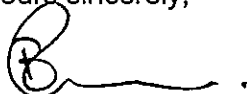
R5 ZONED LAND

The EIS indicates that approximately 20% of the total proposed project site is located on R5 zoned land. The development of a solar farm is prohibited on land zoned R5 under the Mid-Western Regional LEP 2012. At its 17 May 2017 meeting, Council resolved not to support the solar farm occurring within the R5 zone.

It should be noted that there are some inconsistencies in the EIS regarding the total project site area. Council's records show a total site area of 309.65 ha, compared to 332 ha in the EIS. Further, there are different developed areas mentioned in the EIS (eg. 206 ha on pages 3 and 83, and 225 ha on pages 16, 25 and 136).

If you wish to discuss this matter in further detail, please do not hesitate to contact Council on 02 6378 2850.

Yours sincerely,



BRAD CAM
GENERAL MANAGER