



**Edward  
River**  
COUNCIL

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Address all correspondence  
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Attn: Eleanor Parry  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

18.12.2017

Dear Eleanor,

**State Significant Development SSD 17\_8436 – Tarleigh Park Solar Farm**

Edward River Council have reviewed the Environmental Impact Statement for the proposed solar project located on Lot 88 DP756339 Parfreys Road Blighty and provide the following comments and conditions for consideration and inclusion on any development consent.

Council requests a copy of the draft conditions to review, prior to the issuing of the Notice of Determination.

If you would like further information regarding Council's submission, please contact Shavaun Tasker, Town Planning Officer on 03 5898 3053.

Yours Sincerely

**Adam McSwain**  
General Manager  
Edward River Council

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**EDWARD RIVER COUNCIL SUBMISSION**  
**SSD 8436 – TARLEIGH PARK SOLAR FARM**

**B-Double and Road Train Access to Site**

It is noted that the site shall be accessed from Parfreys Road which adjoins the Riverina Highway. A section of Parfreys Road between the site and Riverina Highway, approximately 1km long, is approved for b-double and road train access and this would need to be extended by approximately 1.3km to provide b-double and road train access to the site.

**Road Maintenance**

Due to the additional traffic movements on the regional road and local road network, especially during the construction phase of the project, the proponents shall need to enter into a maintenance agreement with Council for the additional maintenance of the road network. This agreement would need to be in place prior to commencement of any work on the site. It is noted that the submission refers to this requirement for a maintenance agreement between Council and the proponents.

**Upgrading of Intersection**

It is noted that one intersection shall need to be upgraded as part of the development to allow for the additional traffic during construction works. The intersection, and the relevant intersection treatment, is noted below.

<b>Main Road/Though Road</b>	<b>Branch Road</b>	<b>Minimum Intersection Treatment for Right turn from Through Road</b>	<b>Minimum Intersection Treatment for Left Turn from Through Road and Branch Road</b>
Riverina Highway	Parfreys	As per Roads and Maritime Services requirements	

**Upgrading of Parfreys Road**

Parfreys Road would not need to be upgraded as part of the project. The proponent would need to enter into a maintenance agreement with Council regarding the condition of the road as previously noted.

**Construction Management and Issues**

It is noted that a construction management plan shall be implemented as part of the proposed project. The plan shall need to ensure that impacts on the community and public during construction are minimised and that work to the public road network as noted above is completed prior to commencement of any work on the site.

**Work within the Public Road Reserve**

Any work within the public road reserve shall require approval from Council prior to commencement via a road open permit.

**Disposal of Waste**

It is noted that any waste generated during construction activities would be classified as building and demolition waste as part of general waste. The Deniliquin landfill is licensed to accept this type of waste.

All waste generated from the site requiring disposal at a licensed landfill shall be disposed of at the Deniliquin landfill. The rural landfills at Blighty, Conargo and other villages in the local government area shall not be used for disposal of waste from the project.

#### Visual Impact and Landscaping

The EIS states that fourteen viewpoints with foreground and middle ground views of the solar farm were assessed. One viewpoint would have no impact, eleven viewpoints would have low impact and two viewpoints (along Parfreys Road adjacent to the site) would have medium impact. From the view points assessed the proponent seeks to only address the two 'medium impact' viewpoints.

The EIS recommends the use of a landscape management plan to address the 'as built' visual impacts of the proposed solar farm. Council agrees that the landscape management plan is required to be submitted and should include the following;

- On-site vegetation screening with the intent of completely screening rather than 'breaking up' views of onsite infrastructure in accordance with Appendix F – *Proposed onsite screening*. This may require some infill planting within existing vegetation to ensure the screening is dense enough to prevent visual impact.
- General methods to reduce visual impact to include things such as colour, form and positioning of infrastructure, to reduce the overall visual contrast of the project.
- Shelter screen trees and shrubs are to be native plant species consistent with existing vegetation types on the proposal site and should be selected in consultation with a botanist, affected neighbours, and Council.
- Shelter screen trees/shrubs should be of adequate size and maturity to be reasonably effective as soon as construction of the solar panels is complete.
- Details should be provided to Council as to how the screen trees/shrubs will be irrigated over the life of the proposed project.
- Landscaping is required to be completed prior to the use of the site as a solar farm.

#### Security Lighting Impacts

The EIS states the continuous security lighting (infra-red) and CCTV cameras would be installed on posts up to 3.5m high around the perimeter of the site. It is noted that should the use of security lighting be installed any such lighting should be positioned to direct light away from any neighbouring residential dwellings.

#### Bushfire Risk

The EIS states that in view of the likely hazards and risks, the proposal is not considered likely to present a substantial bushfire ignition and structural fire threat, or to represent an unacceptable hazard in the event of a bushfire affect the site.

An asset protection zone (APZ) of a minimum width of 10 metres is proposed to be provided around the solar farm buildings, substation and energy storage facility, and around the outside perimeter of the solar array. It is proposed that a 10m APZ also be applied to any woody vegetation planting undertaken around the perimeter of the solar farm. The APZ is proposed to be managed as an inner protection area.

Efficient access (suitable of firefighting vehicles) are required to be established and maintained over the solar farm site in accordance with the requirements of the Planning for Bush Fire Protection 2006.

A steel or concrete water storage tank (with a minimum of 20,000 litres reserved for fire-fighting purposes) is proposed to be installed adjoining the main internal access road for fire fighting and other non-potable water uses.

A fire management plan and an emergency response plan are required to be prepared prior to use of the site as a solar farm. These plans should be prepared in consultation with the local NSW Rural Fire Service.

#### Accommodation for workers during construction

The proposal is expected to require accommodation need for 45 'external' workers at the construction peak. The EIS states that this is 3% of total commercial accommodation rooms in the study area (Edward River and surrounding LGA's).

Detail should be provided in relation to how the proponent will handle accommodation during peak tourism times in Deniliquin. The peak tourism times in Deniliquin are between mid-December and January, Easter and the long weekend in September/October (Deniliquin Ute Muster weekend).

#### Detail in relation to management of proposed community fund

The EIS states that RES is committed to providing \$20,000pa (linked to CPI) to a Community Fund, equating to \$0.7million over 25 years (adjusted for CPI). The Community Fund could be used to support a range of projects which might include environmental and local community projects. The fund would likely be managed by a local community group or Edward River Council.

Information is required to be provided in relation to how the fund would be administered and by whom and specific criteria for the proposed funding. Any project on Council owned or managed land will require the approval of Council as the landowner or manager and should not translate to a significant long-term maintenance cost for Council.

#### Dust Mitigation

The EIS states that water trucks will be used when required to suppress dust on unsealed access roads and tracks during construction. The EIS also states that additional stabilizing techniques and/or environmentally acceptable dust control would also be applied if required to suppress dust. Details in relation to dust mitigation should be included in the construction management plan.

#### Construction Hours

The EIS states that during the construction of the solar farms standard daytime construction hours would be used being 7.00am to 6.00pm Monday to Friday and 7.00am to 1.00pm Saturdays. The EIS does not identify any construction work to be carried out on Sundays or Public Holidays.

The proposed construction hours are inconsistent with the NSW EPA *Interim Construction Noise Guidelines* for weekend arrangements. Construction hours for Saturdays are required to be 8.00am to 1.00pm, and no work is to be carried out on Sundays or Public Holidays.

#### Primary Production Lands

The final proposal needs to consider how the development will maintain the viability of the land and its contribution to the agricultural production of the region.

The EIS states that the proposal would displace irrigated cropping at the site for the life of the solar farm (around 30 years). The EIS identifies that some sheep grazing may be undertaken at the proposal site for production purposes and to control grass and weed growth around the solar arrays. The EIS also identifies that adequate groundcover would be maintained to protect soil and water values, subject to climatic conditions.

The above-mentioned measures may assist in maintaining the viability of the land. Council supports any measures that will contribute to maintaining the viability of the primary production land.

#### Project Decommissioning

The EIS states that the Tarleigh Park Solar Farm is expected to operate for 30 years. After this period the solar farm would either be upgraded (pending any additional approval requirements) or decommissioned.

The EIS states that a Decommissioning Environmental Management Plan (DEMP) with an indicative timeline would be prepared and submitted to DPE prior to the works and a Decommissioning Traffic Management Plan would be captured as part of the DEMP.

Decommissioning is required to be appropriately conditioned to ensure Council that it will happen in a timely manner.