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26 April 2022

Javier Canon  
Director Energy Assessment, Planning & Assessment  
Department of Planning & Environment Locked Bag 5022  
Parramatta, NSW 2124

**Subject:** *Submission to SSD-10387 – Daroobalgie Solar Farm*

**Reference:** *SSD-10387*

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Dear Javier,

I refer to the proposed Daroobalgie Solar Farm (State Significant Development 10387) to be located within the Forbes Shire Council Local Government Area, for which the EIS is currently on public exhibition.

Council notes that the proposal includes the following:

- The project as the capacity of approximately 100 megawatts (MW);
- At the peak of construction have 320 employees; and
- The development has a lifespan of approximately 30 years.

Council provides the following comments for the Department's consideration in its assessment of the application.

Council considers the proposed project has merit, however there are a number of matters – see listed below in this letter – that require satisfactory resolution with Council prior to the issuing any development consent.

#### **Worker Accommodation**

Council notes that the Applicant has committed to ensuring 52% of the workforce are locals and strongly supports this commitment.

Council also notes that the Applicant proposes to utilise existing short-stay accommodation options within Forbes and Parkes.

Council requires more detailed evidence to demonstrate that there is sufficient local accommodation to support the project, considering major events such as the Elvis Festival, Vanfest and harvest season. This analysis should also consider the cumulative impact of other State Significant Developments in the region such as Cowal Gold Mine expansion, the Sunrise Mine, the proposed Peninsular Solar Farm, inland rail and Newell Highway upgrades and the Parkes Special Activation Precinct.

To this point a worker accommodation plan should be provided to further detail out how worker accommodation will be addressed.

## **Transmission Line**

Council notes that the proposed transmission line is primarily within Council's road reserve. Council advises that this work will require approval in accordance with Section 138 of the *Roads Act 1993*, with concurrence from Transport for NSW.

An occupation license will also be required to occupy the road reserve. As this will form the main connection back to the public infrastructure network Council requires both these matters be addressed prior to the determination of the project.

## **Waste Management**

Council requires additional information in regard to waste management prior to determination of the application.

The Applicant has not provided details regarding how the waste will be disposed of, and simply states that there will be minimal waste. This is insufficient information and prior to the granting of any approval Council requires detailed information on:

- Waste types;
- Waste quantities;
- Opportunities for recycling
- Timeframes for when generated over the life of the Project; and
- How the waste types will be managed

Council's experience with solar farms is that there is a significant number of pallets and styrofoam in particular and Council requests that the Applicant investigate options to recycle these materials to avoid contributing to landfill.

Council requires the above information is provided in the form of a detailed *Waste Management Plan* for consideration by Council prior to determination of the Development Application.

## **Road network**

The proposal will have significant impact on Council's road network during the construction stage of the project. As such, Council requires a number of conditions to be included in the determination document.

Council supports the Applicant's proposal to upgrade the Back Yamma Road and Troubalgie Road intersection. This upgrade must be a condition of consent. Council considers it necessary that this intersection be upgraded to a Basic Left/Basic Right intersection arrangement in accordance with *Austroads Guide to Road Design* and designed to accommodate the turning paths of the largest vehicle. This work and design is subject to approval by Council in accordance with Section 138 of the *Roads Act 1993*, and is to be conditioned as such.

Council supports the Applicant's proposal to seal Troubalgie Road from Back Yamma Road to the access location of the development site and requires this be a condition of consent. This work and design is subject to approval by Council in accordance with Section 138 of the *Roads Act 1993*, and is to be conditioned as such.

Council requests that the intersection access to the project site is designed as a Basic Left/Basic Right intersection treatment in accordance with *Austrroads Guide to Road Design*. This is to be a condition of consent and the design subject to approval by Council in accordance with Section 138 of the *Roads Act 1993*.

Forest Road is an unsealed road and is not capable of accommodating additional traffic. Council requires that the Applicant use a shuttle bus service to prevent the use of Forest Road by project-related light vehicles. Forest Road should be monitored to ensure that contractor and special use private vehicles do not make use of this road. Procedures preventing the use of Forest Road must be presented in a Driver Code of Conduct and as part of the conditions of consent.

Council requests that a Driver Code of Conduct be created to the satisfaction of Council which addresses the following:

- Driver fatigue management;
- Prevention of the use of Forrest Road for all vehicles associated with the proposal;
- Prevention of construction vehicle movements during 8am – 9am and 4pm – 5:30pm Monday – Friday;
- Measures to prevent impacting school bus routes; and
- Procedures to monitor and ensure compliance with the Driver Code of Conduct

The Driver Code of Conduct should be to the satisfaction of Council and approved prior to the commencement of works and conditioned as such in the determination document.

### **Remediation**

A condition of consent is required that a remediation plan be prepared prior to closure of the facility, and subject to the approval of Council.

### **Voluntary Planning Agreement**

Council has been actively liaising with Pacific Hydro to secure a Planning Agreement. There is still some way to go to complete those negotiations. Council requires the key terms of the Planning Agreement to be finalised prior to any consent being contemplated.

I trust this information is of assistance. Council would welcome the opportunity to discuss the matters herein with the Department. Thus, please don't hesitate to call Eliza Noakes, Acting Manager Development & Planning, at (02) 6850 2300 (Option 1).

Yours faithfully,



**Steve Loane OAM**  
**General Manager**

