



**Edward
River**
COUNCIL

1 Civic Place (PO Box 270)
Deniliquin NSW 2710
T 03 5898 3000 F 03 5898 3029
council@edwardriver.nsw.gov.au

www.edwardriver.nsw.gov.au
ABN 90 407 359 958
Address all correspondence
to the General Manager

Attn: Tim Stuckey
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

18.12.2017

Dear Tim,

State Significant Development SSD 17_8437 – Currawarra Solar Farm

Edward River Council have reviewed the Environmental Impact Statement for the proposed solar project located on Lot 40 DP756344, Lot 109 DP756305, Lot 110 DP756305, Lot 106 DP756305, and Lot 105 756305 Mayrung 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

Direct: 03 5898 3040
Mobile: 0428 501 213
Email: adam.mcswain@edwardriver.nsw.gov.au
Fax: 03 5898 3029

EDWARD RIVER COUNCIL SUBMISSION
SSD 8437 – CURRAWARRA SOLAR FARM

B-Double and Road Train Access to Site

It is noted that Mayrung Road near the site is not approved as a b-double or road train route and the proponents would need to apply for this approval if they require this level of access. As Council typically provides these approvals based on specific land uses and therefore an application to Council would be submitted should the development be approved.

Inspections along Mayrung Road to the west of the site have noted the existing b-double and road train routes may be extended to the site, however, further investigation of this shall be required once an application is received.

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.

Vehicle Traffic Past Mayrung School

It is noted that Mayrung School is located approximately 5km east of the proposed site along Mayrung Road and an alternate route is proposed for vehicles travelling from the east to access the site avoiding the school.

Any conditions of approval for the development should not allow project related traffic to travel along Mayrung Road past the school. As noted, there is a suitable travel path from the Riverina Highway to the site that does not go past the school and would not impact the efficiency of the vehicle movements.

Prior to the commencement of any work the proponent, in consultation with Council, would need to erect signage along the local road network advising that roads that may lead project related traffic past Mayrung School are not to be used. Any such signage would be warning/advisory in nature.

Any such signage would need to be approved by Council prior to fabrication and installation and installed in accordance with Council's requirements.

Russells Road

It is noted that Russells Road, past Mayrung Road, is within a Crown road reserve rather than a public road reserve. This section of Russells Road is included in Council's asset database and is maintained by Council as a low volume gravel road.

It is noted that the proposed site does not include Lot 30 DP 756344, which is a parcel of land containing a residence owned by the owners of the proposed site. The residence uses Russells Road as a public access road to Mayrung Road. The adjoining property also uses Russells Road as an alternate access, with the main access off Mayrung Road.

Advice from Crown Lands has indicated that the Crown road reserve would need to be transferred to Council as a public road reserve and that this process would need to occur prior to the occupation of the site. Any such transfer would require a Council resolution.

The proponent may propose the closing of Russells Road at the entry point to the site and that a 'right of way' be created for access to Lot 30 DP 756344. The submission notes that the project site shall need to

be subdivided from the main property, in accordance with the requirements for long term leases, and any such subdivision would need to include the road closure and 'right of way'.

This option is preferred as Lot 30 DP756344 shall remain part of the larger property that contains the development. The road would then be converted to an internal road for the development and be the responsibility of the property owner to maintain. As there are no other properties that would utilise this section of Russells Road for access, there are no issues relating to the denial of access to other properties.

Upgrading of Intersection

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

Main Road/Through Road	Branch Road	Minimum Intersection Treatment for Right turn from Through Road	Minimum Intersection Treatment for Left Turn from Through Road and Branch Road
Mayrung Road	Russells Road	BAasic Right turn (BAR)	BAasic Left turn (BAL)
Mayrung Road	Sunny Pines Road	BAasic Right turn (BAR)	BAasic Left turn (BAL)
Moonee Swamp Road	Mayrung Road	AUxillary Right turn (AUR). Treatment needs to incorporate the fact that the road is a cross intersection.	BAasic Left turn (BAL)
Moonee Swamp Road	Lakers Road	AUxillary Right turn (AUR). Treatment needs to incorporate the fact that the road is a cross intersection.	BAasic Left turn (BAL)
Riverina Highway	Lakers Road	As per Roads and Maritime Services requirements	

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. This is through the issuing of a road opening 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 thirteen viewpoints with foreground and middle ground views of the solar farm were assessed. Eleven viewpoints would have low impact and four viewpoints 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 60 'external' workers at the construction peak. The EIS states that this is 4% of total commercial accommodation rooms in the study area (Edward River and surrounding LGA's).

Some 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 \$50,000pa (linked to CPI) to a community fund, equating to \$1.7million 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 Currawarra 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.