

Document: 397016

21 December 2017

NSW Planning and Environment
GPO Box 39
Sydney NSW 2001

Subject: Jemalong Solar Farm Project (SSD8803)

Dear Sir/Madam,

Council is in receipt of the Environmental Impact Statement for the Jemalong Solar Station 50MW Photovoltaic Plant.

Council supports the construction and operation of the 50MW Photovoltaic Plant.

Council has had a good working relationship with Vast Solar in the development of their two previous pilot plants constructed within the Forbes Shire.

Council raises the following comments for consideration in the assessment of the application.

Road Network

Lachlan Valley Way (Forbes to Condobolin) is a regional RMS classified road.

Wilbertroy Lane and Naroo Lane are both roads under Council control.

The application indicates that during the construction phase, up to 100 workers will be on site during this phase which would generate up to three bus trips and between 10-20 light vehicle trips a day. This estimation is on the assumption that there would be an 80% take up of construction workers being transported to the site via buses. In any scenario there would be a substantial increase in not only transportation of construction workers to the site during the 12 month construction phase but also the increase in heavy ridged vehicles transporting construction materials and products to the site. The increased generation of trips along the unsealed roads of Wilbertroy Lane and Naroo Lane during the construction, operation and decommissioning phase will substantially impact on the quality of these roads.

Not only will there be an impact on the quality of the road, but both Wilbertroy Lane and Naroo Lane are only narrow formations (4m) roads and were not designed for the traffic volumes or vehicle types proposed to be using these roads as a part of this project. Therefore there is likely to be road safety implications during the construction phase of this project.

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Given the road safety implications generated from the Vast Solar project it is recommended that the Wilbertroy Lane and Naroo Lane are widened and sealed to ameliorate any impacts on road safety.

Flooding of the Road Network

The road network proposed to access the site (Lachlan Valley Way, Wilbertroy Lane and Naroo Lane) will be inundated in a flood event as this road network is within identified flood prone land.

This road network does not provide sufficient drainage to ensure that the network can cope with the funnelling of flood water away from the road and therefore this network is likely to be closed during a flood event. There is no alternative access to the site during a flood event. A contingency plan for access during these times should be developed.

Flooding in relation to structures

The proposed development is located on flood-labile land. Any structures located within the floodway should be designed to be capable of withstanding flood waters and debris which may impact on the structures.

Accommodation of workers

The application indicates that during construction period, there would be up to 100 workers living in Forbes and Parkes who would be transported to the site. The Environmental Impact Statement specifies that the workers will be locals, however this is the best case scenario. The Environmental Impact Statement does not discuss how they will accommodate 100 workers where the workforce does not consist of locals.

Whilst there would be significant economic benefits to both Forbes and Parkes through the increased population during the construction stage, there may be issues in obtaining accommodation within Forbes and Parkes given the tight rental markets.

Information has not been provided in relation to how the 100 workers would be accommodated.

Tourist Attraction

The application states that the site may become a tourist attraction in a similar manner to the Parkes Radio Telescope.

Council would encourage the development of the site as a tourist and education facility. Suitable areas for tourist facilities and parking should be considered in the development of the site.

Water Supply

Details would need to be provided of how a potable water supply will be provided to the site during the construction and operation stages.

Onsite Disposal of Effluent

Details of the onsite waste treatment facilities for effluent would need to be provided, indicating their suitability to cater for the expected 100 workers during construction stage, and how this facility would operate once the solar plant is operational.

Stormwater

The site should be graded to enable stormwater to flow to the stormwater control ponds.

Erosion and Sedimentation Control

Erosion and sedimentation control should be installed during construction period.

Flora and Fauna

Any fauna encountered onsite during construction period should be rehomed.

Landscaping Buffers

Landscaping buffers should be provided so as to assist with screening of the solar plant from the dwellings in Whispering Pines Lane.

Site Remediation / Validation

Following the decommissioning of the plant, the site should be remediated and validated, given the chemicals stored on the site.

Construction waste management

The Environmental Impact Statement specifies that the construction waste would be disposed at a licensed waste facility and that a Waste Management Plan would be developed to minimise waste. The Waste Management Plan would include opportunities strategies to avoid, reuse and recycle waste.

The closest licensed facility is Darroobalgie landfill and the rural landfills are reaching capacity and cannot accommodate the level of construction waste proposed to be generated from the site. It is therefore imperative for any Waste Management Plan prepared for the project to ensure that the maximum amount of construction waste is reused and recycled.

Council requests that the above issues be considered in the assessment of the application.

Council also looks forward to working with Vast Solar on the development and continued operation of the 50MW Photovoltaic Plant.

Should you require further information, please contact the undersigned on **6850 2344**

Yours faithfully



Paul Bennett

Director

ENVIRONMENTAL SERVICES & PLANNING