

30 July 2018

Mr Anthony Ko
Major Projects Assessment
Department of Planning & Environment
320 Pitt Street
SYDNEY NSW 2000

Dear Mr Ko

Application: SSD 8703

Location: Tallagandra Lane, Sutton

Proposal: Solar Farm

I refer to the application for the Springdale Solar Farm in Tallagandra Lane, Sutton.

Please note that the public exhibition period does not align with Council's meeting cycle so this is an interim submission until Council has had the opportunity to consider the proposal at its meeting on 25 August 2018.

The following comments are provided for consideration.

1. Settlement Strategy

Council's Settlement Strategy identifies the site as being in the 'buffer' area around the ACT/NSW border. The purpose of the buffer is to preserve the rural landscape values and restrict urban development in these areas. I note the landscape and visual assessment has identified the mitigation and management measures to minimise the adverse impacts i.e.

- Minimise tree removal and protect endemic vegetation
- Review materials and colours (including use of non- reflective finishes)
- Rehabilitate disturbed areas
- Prepare landscape plan (in consultation with the properties with highest impacts) and maintain screen planting

2. Road Impacts

The proposed haulage route for heavy vehicles is:

- Sutton Road from the Federal Highway
- Through Sutton village to East Tallagandra Lane
- East Tallagandra Lane to Mulligans Flat Road
- Mulligans Flat Road to Tallagandra Lane
- Tallagandra Lane to the site entrances

The traffic assessment indicates up to 400 light vehicles per day (over 5 months) and 75 heavy vehicles per day (over 2 months) during the construction phase. Once operating the facility will involve up to 10 vehicles per day.

The proponent's assessment concludes that no significant road upgrades or sealing are required. However there is potential for:

- Culvert upgrade on Tallagandra Lane near the site entrance
- Relocation of traffic signs at turn locations
- Minor road grading of Tallagandra Lane
- Ongoing maintenance (including grading and dust suppression) throughout the construction phase.

At its peak the daily traffic on Sutton Road through the village will increase from approximately 2,900 average annual daily traffic (AADT) to 3,400 AADT. Heavy vehicles are approximately 10% of all vehicles and will increase from approximately 290 to 370. This represents an increase of 25% in heavy vehicles over the 2 month delivery period but after this the number of heavy vehicles will reduce back to preconstruction levels. The increase in vehicle traffic does not alter the road category (i.e. Regional Road) and warrant any upgrade of the road function.

The proponents are only proposing to monitor traffic conditions and repair any damage attributable to construction traffic. However the culvert crossing needs to be assessed for its adequacy for the increase in heavy vehicle traffic.

Heavy vehicle traffic through the Sutton village should be excluded during school hours to reduce conflicts with school traffic and children.

All road work upgrades are to comply with Council's *Roads Standards Policy*.

3. Community Enhancement Fund

Under Council's *Community Enhancement Fund Policy* a fund is to be established based on 1% of the capital cost for the project. The proposed solar farm has an estimated capital cost of \$138M and the contribution based on Council policy would be \$1.38M payable prior to construction. As an alternative to an upfront payment an annual contribution spreading out the contribution over the life of the project – for this proposal with a 30 year life the annual contribution would be \$46,000 per year (adjusted with CPI). Distribution of the funds would be via a Council s355 Committee.

In preliminary discussions with the proponent, legal access to dwellings in Tintinhull Road (off Tallagandra Lane) was identified as an issue. Access to Tintinhull Road is currently via a Crown Reserve which does not provide legal public access to the dwellings. A simple solution to this issue is to realign Tintinhull Road along the southern boundary of the solar farm site. The cost of constructing this realignment can be offset against the Community Enhancement Fund contribution.

The proponents have also offered to upgrade some of the unsealed sections of Tallagandra Lane as a further community benefit. If this upgrade work is above that required for adequate access to the site then this could also be a Community Enhancement Fund offset provided this is agreed by Council.

The proponents have indicated they will be setting up a Shared Neighbour Benefit Scheme for dwellings within 1km of the site however this is **not** part of the community enhancement fund.

If approved the proposal should be adjusted to provide for a Community Enhancement Fund in line with Council policy.

4. Community Consultation

Community consultation for the project includes:

- Extensive pre-lodgement consultation with the community
- Formal public exhibition of the Environmental Impact Statement (including Community Information Drop In session)
- If the project is approved:
 - Construction phase consultation (including arrangements for complaint management, community updates)
 - Operational phase consultation (including ongoing complaints management arrangements, community newsletters)

Both the pre-lodgement and proposed post approval consultation mechanisms are considered satisfactory. Consideration should also be given to the establishment of a Community Consultative committee (similar to wind farm projects) or the like if the project is approve.

The form and length of the community consultation for the formal public exhibition is determined by your Department. It is important that the Department takes into account the complexity of the project and the extent of the documentation which can be daunting to laypersons.

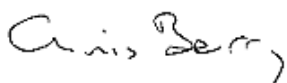
It is also important that the planning assessment examines all the issues raised by the local community and provides adequate forums for concerns to be raised and examined. The Department should consider holding a local forum for submitters to clarify the concerns and to seek responses from the proponent prior to finalising its assessment report.

The assessment report should be available to all submitters and the proponent prior to any hearing or determination.

Any public hearing should be held locally and provide the opportunity for all submitters to address the members with their concerns before any determination is made. Ideally the hearing should be to receive representations from those submitters wishing to address the Commission following which the Commission should retire to properly consider these representations, the assessment report and make a considered and reasoned decision. Far too often the PAC has simply taken submissions and announced its decision, leaving local communities questioning the purpose of the hearing and the role of the Commission.

I trust the above comments assist with your assessment. If you wish to discuss any of the above matters further please contact Liz Makin, Acting Director Planning, until I return to the office on 3 September 2018.

Yours sincerely



Chris Berry
Director Planning