



Director – Resource and Energy Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

4 July 2018

Dear Sir/Madam,

Re: Submission – Application Number SSD 8882
Orange Grove Solar Farm – 1170 & 1354 Orange Grove Road, Gunnedah
(Lots 1 & 2 DP 945590, Lots 27 & 30 DP 754928, Lots 1 & 2 DP1068520, Lot 1 DP 1068518 and
Lots 1, 2 & 3 DP 126183)

I refer to the abovementioned.

Council would like to make a submission in regard to the proposed development.

Traffic Impact Assessment

It is noted that a Traffic Impact Assessment and Management Plan was submitted as part of the application. However, the documentation contains limited details and should be amended to the satisfaction of the relevant road authorities (RMS and Gunnedah Shire Council). The following information is requested:

- Road Maintenance Program inadequately described and does not cover the entire vehicle route, notably for heavy vehicles. A dilapidation assessment and report should be undertaken by suitably qualified and independent civil or structural engineer of the full vehicle route, not just Orange Grove Road. Geotechnical test pits should be considered as part of this assessment to determine existing depth of pavement on Old Blue Vale Road to accurately determine cumulative impacts.
- The unsealed section of Orange Grove Road will need sealing prior to construction commencing to manage dust. A polymer dust suppressant may be a suitable alternative to bitumen given the short term nature of the construction.
- A Traffic Management Plan should be prepared to the satisfaction of the relevant road authorities (RMS and Gunnedah Shire Council).
- The traffic impact assessment has not been reviewed independently.
- A new access should be provided at the development site commensurate with the scale on the proposed development. As a minimum the RMS Typical Rural Property Access Standard for articulated vehicles should be provided.
- Working hours during construction should consider the existing school bus route and times and be adjusted if required.
- The TIA relies on a Code of Conduct to be agreed to by supply contractors however there is little description of enforceable actions in the occurrence that there is a breach of this Code of Conduct. This is notable as Council will have few enforceable powers to deter drivers from not adhering to the proposed HV route if the Code of Conduct is not adhered to.
- The complaint handling process and resolution process should be established prior to the issue of the Construction Certificate.
- A Road Safety Audit should be prepared by a suitably Qualified Road Safety Auditor and made available to Council.
- The access from Orange Grove Road to the proposed development should be sealed.

Gunnedah Shire Council
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- All internal driveways, parking areas, loading bays and vehicular turning areas are to be constructed with a base course of adequate depth to suit design traffic, being hard sealed with either bitumen seal, asphaltic concrete, concrete or interlocking pavers or other alternative product which has been approved by Council. Parking areas must comply with AS 2890 – Parking Facilities and Council's Engineering Guidelines for Subdivisions and Developments, 2013.
- Variable Message Signage (VMS) should be maintained on Kelvin Road during the construction period to advise motorists of the changed traffic conditions. Temporary speed limits should also be considered for the duration of the construction period on the development frontage.
- Old Blue Vale Road proposed as part of the HV Route has a nominal 5m wide seal. To allow 2-way traffic movements opposing vehicles must drive on the unsealed shoulder. The following mitigation measures should be considered:
 - Upgrading of the pavement width at the eastern end of Old Blue Vale Road to allow for opposing heavy vehicles to pass close to Kelvin Road
 - A maintenance agreement with Gunnedah Shire Council for the construction period on Old Blue Vale Road.
- Commensurate light vehicle car parking should be provided for the proposed staff during the peak construction period or alternate arrangements made.
- Records of Daily monitoring of road conditions should be maintained and made available on request to relevant road authority in accordance with Impacts.
- The required intervention level should be established with the Road Authority prior to the issue of a Construction Certificate.
- A Road Opening Permit (Section 138) will be required for any works undertaken on Council's Road Network.
- A Maintenance Bond/ Defects Liability Period may be a satisfactory compromise to mitigate the recommended requirements.

Flooding

The Flood Impact Assessment notes a flood event in 1998. Clarification is sought as to which flood event the assessment has been based on, as there were a number of flood events in 1998. In addition, the assumptions have been based on approximate flood levels, without any site specific flood modelling. Site specific flood modelling should be provided to confirm these assumptions.

It is requested that if any amendment is made to the Flood Impact Assessment, that sufficient time and opportunity to review and comment on the material be provided to Council and the community.

Social and Economic Impacts

The social and economic assessment does not provide adequate detail. Further details is requested in regard to:

- Accommodation within Gunnedah and other neighbouring towns is noted. However, there has been no assessment in regard to the availability of this accommodation, particularly during the construction phase. The cumulative impact of the existing and proposed developments should be considered.
- The impacts on health and other services are not identified. An assessment of the availability of these services or any proposed actions if services are not available should be provided.
- The EIS does not provide adequate detail regarding the proposed workforce and any potential for training programs, within the local community. The availability of workers has not been considered. It is requested that the skills and employment strategy be developed prior to the commencement of works.

State Environmental Planning Policy No. 44 – Koala Habitat Protection (SEPP44)

The SEPP 44 assessment only refers to the development footprint. The SEPP44 does not differentiate between development footprint and development site. Consequently, the assessment of koala habitat is to refer to the whole development site. As the EIS identifies the development footprint as potential Koala habitat, further assessment of the development is required to identify if the site is core Koala habitat. – check Appendix C.

Other Impacts

In addition to the above, the impacts of the proposed development should also address the following:

- Visual impact – it is recommended that all proposed landscaping be undertaken prior to the commencement of construction works.
- Waste disposal – it is noted that waste from the development will be taken to licensed waste facility. As requested previously, for the disposal of large volumes of waste at Council's Waste Management Facility, that notification be provided in advance to assist with the disposal.
- As the development will require the subdivision of land, it is requested that the residual land be consolidated into one lot to prevent any further fragmentation of agricultural land.
- Council's Section 94A Contributions Plan applies to the development site. It is requested that any requirement for the payment of contributions be included on the notice of determination.

If you have any questions regarding this matter, please contact Council's Manager Development & Planning, Carolyn Hunt on 6740 2100.

Yours faithfully



Carolyn Hunt
MANAGER DEVELOPMENT & PLANNING

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