



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

25 May 2018

Dear Sir/Madam,

Re: Submission – Application Number SSD 8658
Gunnedah Solar Farm Pty Ltd - 765 Orange Grove Road, Gunnedah
(Lot 1 DP 1202625, Lots 151, 153 & 264 DP 754954, Lot 2 DP801762 and Lot 1 DP 186590)

I refer to the abovementioned.

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

Submitted Documentation

It is advised that the site plans and maps provided with the Environmental Impact Statement (EIS) are difficult to review. For example, clarification is requested in regard to the proposed use of the unsealed, unnamed road off Orange Grove Road, located near the western boundary of the site. Council's mapping does not illustrate any "road" to the west of the site, only an internal farm road, that could possibly be located within the adjoining property (which is not included in the development application). A more detailed site plan should be prepared to determine if the "road" is located on the development site.

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:

- The volume of light vehicle traffic per day has been estimated during the peak construction period to be 40 vehicle movements per day (round trip i.e 40 inbound and 40 outbound). This figure relies on an average vehicle occupancy of 4 people per vehicle which is considered conservative. A 'realistic' scenario may rely on an average vehicle occupancy of 1-2 people per vehicle. This increases the light vehicle movements to 80 inbound and 80 outbound during the construction peak. This should be considered and if any amendment is made to the Traffic Impact Assessment, sufficient time and opportunity to review and comment on the material should be provided to the relevant roads authorities.
- 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 should 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. In fact, to the contrary, the document states that disciplinary actions "will be considered". This is important 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.

Gunnedah Shire Council
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- The complaint handling process and resolution process should be established prior to the commencement of works.
- A Road Safety Audit should be prepared by a suitably Qualified Road Safety Auditor and made available to Council.
- Commensurate light vehicle car parking should be provided for the proposed 150 staff during the peak construction period or alternate arrangements made.
- 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 mitigation measures listed in Section 2.3 (Page 21) should be applied, in particular;
 - 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.
- Standard hours of work are listed as 7am to 4pm on Saturdays in the Traffic Impact Assessment and Management Plan. This is considered to be outside the 'typical' standard working hours of 8am to 1pm on Saturdays. However, this maybe preferred by residents as the construction period could be reduced.
- The dilapidation assessment and report should be undertaken by a suitably qualified and independent civil or structural engineer. 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.
- Records of daily monitoring of road conditions should be maintained and made available on request to relevant road authority in accordance with Impacts on Blue Vale Road recommendations in Section 4.1.4 (Pg 32).
- The required intervention level should be established with the Road Authority prior to the commencement of works.
- 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 of Section 4.1.4.

Flooding

The EIS mapping of the proposed security fencing, illustrating the locations of the proposed laneways, is not of an adequate scale to review. It is noted that the site is to include remote monitoring. Hence, further detail is requested in regard to how the proposed flood measures will be implemented during a flood event.

The Flood Impact Assessment notes that the 1984 flood event was the largest event recorded for the gauges at Carroll Gap and downstream Keepit Dam (being more than 25km from the site). The records from these gauges were utilised in the hydraulic modelling and scaled up to yield hydrographs for a range of AEP events. Clarification is requested as to why the 1955 flood event data (being the event closest to the 1% AEP flood event) or records from the gauge at Gunnedah was not utilised in the hydraulic modelling. Other tributaries feeding into the area, which also impact on flooding particularly at this site, should also be considered to ensure accurate flood modelling.

The EIS has limited details regarding the proposed earth mound for the substation and whether it will result in any impact on the adjoining property, as it was not included in flooding configurations modelling. It is recommended that the flood configuration modelling be updated to include the substation earth mound.

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.

- Accommodation within Gunnedah is noted, however, there has been no assessment in regard to the availability of this accommodation, particularly during the construction phase.
- The impact on health services is identified. However, it is suggested that workers will utilise services in adjoining towns. There is no assessment of the availability of these services or any proposed actions if services are not available.
- 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 assessment provided in the EIS does not address the provisions of SEPP44. Section 4.5.5 (pg 50) notes that the site contains no Schedule 2 Koala feed trees and is not potential Koala habitat. However, Section 6.1.2 (pg 84) notes that the White box habitat type was recorded within the subject land and (pg 86) notes that the site contains potential Koala habitat. As the site is identified as containing potential Koala habitat, an assessment as to whether the site contains core Koala habitat is to be undertaken.

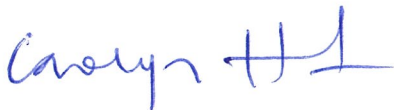
Other Impacts

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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