

JR:CA:LAN900086

7 May 2019

Attention: Anthony Ko
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Anthony,

RE: WOLLAR SOLAR FARM (SSD 18_9254)

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to provide input into the Environmental Impact Statement (EIS) for the proposed Wollar Solar Farm (SSD 18_9254). Council has reviewed the EIS for SSD 18_9254 and would like to provide the following feedback for consideration.

PROJECT DETAILS

The EIS documentation indicates that approximately 922,432 panels are proposed to be installed as part of the project. A representative of Wollar Solar recently presented details of the project at a Council workshop and a question regarding the type and number of panels to be installed was raised.

The question was asked in reference to a recently approved solar project in the Mid-Western Region (Region) which proposed a similar number of panels, but the electricity generated (87MW) is approximately one third of what is being proposed by the Wollar Solar project (290MW). It was subsequently confirmed by the Wollar Solar representative that the estimated number of panels for the project is within the range of 870,000 to 1,392,000 panels.

Whilst it is noted in the EIS that a full design (including types of panels used, panel configuration and numbers) is yet to be determined, there is concern that all of the reports prepared are based on the assumption that 922,432 panels will be installed. If 1,392,000 panels were to be installed, the current EIS and supporting documentation has underestimated the likely impacts of the project by up to 50%. The assessment of issues such as traffic movements, construction timeframes, workforce, number of PCUs, site coverage, waste, noise and visual impacts are all heavily dependent on the number of panels to be installed.

Council believes that it is important to assess the project based on the maximum number of panels to be installed to ensure the project impacts are accurately captured and managed accordingly.

TRAFFIC ASSESSMENT

The Traffic Impact Assessment (TIA) report (attached as Appendix J) has been considered and the following observations made:

- The TIA makes several references to a Road Transport Assessment associated with the Wilpinjong Mine Expansion in 2015. The TIA makes assumptions that there are similarities between the traffic impacts of the Wilpinjong Mine Expansion and the potential traffic volumes and movements for the Wollar Solar project. It should be noted that the traffic study submitted for the Wilpinjong Mine Expansion, also made assumptions based on projected traffic volumes that were not supported by detailed traffic counts. Accordingly any reference to existing and projected vehicle numbers could not be regarded as giving a true indication of existing conditions or future traffic impacts.
- In considering traffic generation and distribution on the local road network, the TIA also relies upon the trip distribution share percentages for visitors, suppliers, workers etc. adopted for the Wilpinjong Mine Expansion. As the Wilpinjong Mine Expansion related to the extension to the mine life, as opposed to the construction of a new major project, it is not appropriate to utilise the same percentages. To properly assess the traffic impacts of the Wollar Solar project, traffic generation and distribution should be based on actual/expected traffic movements associated with the Wollar Solar project particularly during the construction period.
- It is understood the site visit referenced in Section 5.3 was of short duration and the reference made to *“minimal traffic through the Wollar Road / Barigan Road intersection”* and *“A single vehicle was observed using Barigan Road”* highlights that construction traffic will have a significant impact on Barigan Road.

As per Council’s input to SEARs, Council requests that the proponent undertake a full traffic assessment based on the actual transport routes proposed by the Wollar Solar project and based on the maximum project size (ie. up to 1,392,000 panels), instead of relying upon studies undertaken for unrelated projects.

The traffic assessment should demonstrate the type, number and timing of vehicle movements across the entire local network and specifically address those that have been mentioned as potential transport routes throughout the EIS. It should identify where all of the materials and resources for the project will be sourced, the proposed transport routes and the estimated number of vehicles utilising each route.

ROAD UPGRADES

The safety of all road users across the local network during construction and operation of the Wollar Solar project is a primary concern for Council. As per Council’s input to SEARs, Council requests specific details of the proposed road upgrades that the applicant intends to undertake prior to the commencement of construction. Consideration of any road upgrades, intersection treatments, railway crossings etc. should be informed by a full traffic assessment and road audit along the proposed transport routes for the Wollar Solar project.

The TIA has identified Barigan Road as a priority consideration for enhancement. Based on the forecast number of traffic movements during construction which may be even greater depending on the number of panels, Council’s recommendation is that Barigan Road be upgraded (including widening to accommodate two way traffic, sealing and line marking). This includes, but is not limited to, safe and ease of site access in the case of a bushfire.

Council has concerns about the use of the Wollar Road between Ulan Road and the Wollar village during construction, as this is also a proposed transport route for the Bylong Coal project. As the traffic assumptions in the EIS are taken from the Wilpinjong Mine Expansion, there is insufficient detail regarding the specific traffic movements on Wollar Road associated with the Wollar Solar project and the cumulative impacts of the Bylong Coal project to fully assess overall traffic impacts.

Both Council and the NSW Department of Planning & Environment have already identified safety issues on the Wollar Road, particularly around the Munghorn area. A full traffic assessment for Wollar Road should be provided so that the suitability of this route can be assessed, and any road upgrade and/or maintenance requirements can be determined.

The EIS notes that a Dilapidation Report will be prepared prior to the commencement of construction. This should include all of the roads along the proposed transport routes. All of the identified road upgrades and access works should also be completed prior to the commencement of any site works.

It is requested that the proponent provide a Traffic Management Plan for the construction phase for approval by Council prior to any works commencing (including pre-construction works).

ROAD ACCESS

It is noted in the EIS that there are two proposed access routes to the site (the Northern and Southern Access). The Northern Access requires an easement to be established with both Peabody Australia and Transgrid. The Southern Access requires an easement to be established with Peabody Australia or establishment of a physical road within Council's road reserve.

Where site access relies upon easements, Council's normal approach is to require legal access arrangements to be established and secured prior to the project being determined. This may be achieved by having easements with relevant land owners or obtaining necessary approval from Council for the construction of a physical road within the road reserve.

WASTE MANAGEMENT

It is noted that there will be a significant amount of waste generated by the project during both construction and decommissioning phases. Council requests that the proponent provide a Waste Management Plan prior to construction and decommissioning which details the types of waste (including pallets, panels, steel piles, packaging, and batteries), expected volumes and how the waste will be disposed. A commercial waste agreement may be required.

Council does not permit building or commercial waste to be disposed of at rural waste transfer stations, such as the Wollar waste transfer station.

ACCOMMODATION

The consideration of accommodation requirements for the Wollar Solar project during construction is considered deficient in the EIS. The information presented in the EIS utilises information prepared for another major project and therefore, does not consider the specific needs of the Wollar Solar project. There is no analysis of the accommodation impacts should the construction of the Wollar Solar project overlap with other major projects in the Region.

It is also noted, that the EIS is based on the assumption that 50% of the workforce will be sourced locally. Based on recent experience, the majority of the workforce is likely to come from outside the Region. It is unclear whether this is due to the temporary nature of the workforce or the specific nature of the work.

Council requests that the applicant provide further information, which specifically reflects the number of beds and types of accommodation that will be required on a monthly basis during construction. An accommodation strategy should be developed considering the total accommodation required under various scenarios (for example assuming a 25% and 50% local workforce, assuming construction period overlaps with other major projects and considering peak tourism activity).

VISUAL AND NOISE IMPACTS

Council notes the noise and visual amenity assessments undertaken as part of the EIS. As discussed above, it is important that any visual and noise impacts for the Wollar Solar project be considered based on the maximum number of panels to be installed (ie. 1,392,000 panels).

The EIS indicates that seven representative viewpoints were assessed as part of the visual impact assessment. The Wollar Solar project was identified as having a "Medium Impact" for traffic along Barigan and Tichular Road and Receivers 10, 11 and 12 (neighbouring residences). Whilst an image of the existing agricultural landscape is included in the EIS, there is no visual representation of what the landscape would look like once the solar farm has been constructed. It is also unclear whether the neighbours (at Receivers 10, 11 and 12) have been specifically consulted about the visual impacts.

In keeping with the local agricultural character and scenic value of the rural landscapes in the Region, Council's preference is to minimise the view of solar farms from public viewpoints and neighbouring residences. Given the potential sensitivities around visual impacts, a visual representation of the landscape once constructed from viewpoint 6 would assist in alleviating any concerns.

ANCILLARY BUILDINGS

The EIS notes that there are a number of proposed operations and maintenance buildings to support the Wollar Solar project. Any buildings and ancillary infrastructure should comply with DCP setback requirements and ideally, not be visible from any public road.

A condition should be included requiring the proponent to obtain the relevant Construction and Occupation Certificates under Part 4 of the *EP&A Act 1979*, or approvals under Section 68 of the *Local Government Act 1993*, for all buildings, structures or waste disposal systems placed on the site.

DECOMMISSIONING AND REHABILITATION

Council requests that a decommissioning and site rehabilitation plan, and an ongoing land management plan be submitted.

A land management plan should demonstrate how the site will be maintained (including weed spraying, grazing and mowing) and how this will affect the land's capability to return to agricultural land upon decommissioning and rehabilitation of the site, with the primary issue being land contamination and soil degradation occurring as a result of continual pesticide applications.

It is expected that decommissioning will occur within a reasonable timeframe (eg. 2 years) of the solar farm ceasing to operate, even if this occurs prior to the projected 30 year life of the project.

VOLUNTARY CONTRIBUTION

The EIS notes that Wollar Solar proposes to establish a community fund which is expected to be positively received by the community. Whilst Council has not specifically discussed details of a voluntary contribution with the proponent to date, a contribution of 0.1% of the Capital Investment Value, via a Voluntary Planning Agreement, or other similar mechanism would seem reasonable given the size of the project, likely impacts and project life.

COMMUNITY CONSULTATION

Council acknowledges that Wollar Solar has attended meetings with relevant stakeholders during the planning process including a presentation to Council and consultation with the Wollar Progress Association.

Representatives of the Wollar Progress Association presented to Council at an Open Day session in April and indicated support for the project. There were no concerns or issues raised in relation to any of the anticipated project impacts identified in the EIS. No issues were raised regarding the impact of the project on the local character values of the Wollar village.

Council requests that community consultation is ongoing to ensure that the community has current and accurate information about the project and to provide feedback on the proposed project including any visual, noise or social impacts. It is recommended that a Community Hotline is established prior to the commencement of construction to manage any community enquiries or complaints.

Should you have any questions or wish to discuss the matters raised above in further detail, please contact Council on (02) 6378 2850.

Yours sincerely,



**JULIE ROBERTSON
DIRECTOR DEVELOPMENT**