



**Greater
Hume
Council**

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Rob Beckett
Environmental Assessment Officer
Energy, Resources and Compliance
Department of Planning, Industry and Environment
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PARRAMATTA NSW 2150

By email: rob.beckett@planning.nsw.gov.au

Dear Mr Beckett

Greater Hume Council's Endorsed Comments - Response to Submission and Amendment Reports – Culcairn Solar Farm

I refer to your emailed request for Council to provide comments on the Response to Submission and Amendment Reports for the Culcairn Solar Farm which was received by Council on 11 June 2020.

Council at its Ordinary Meeting on 17 June 2020 resolved to respond and indicate that Council acknowledges that the amendments that have been made to the development proposal address some of Council's concerns however, Council still holds the following concerns:

- Heat island effect – Council acknowledges that the Culcairn Solar Farm will adhere to the Victorian Planning Panel reports recommendation of a 30 metre setback from the edge of the closest panel to the neighbouring property boundary. However, there are large areas of the perimeter of the development where there are no vegetation strips to be planted. The information supplied in the response to submission indicates that the presence of trees aids in reducing the heat island effect;
- Neoen is not willing to include the community benefits payments as part of the VPA and has made no change to the timing of payments under the VPA with Council;
- Neoen is not willing to utilise advanced trees as they believe tube stock will provide a superior outcome;
- An onsite fire-fighting unit will not be provided unless specifically requested by FRNSW and the RFS;
- No RFS evaluation or comments provided specifically for the Culcairn solar farm and
- Neoen is only prepared to have their weeds report verified from one agronomist.

Council wishes to raise concerns that it will be the appropriate regulatory authority under the Protection of the Environment Operations Act 1997.

Council resolved to include an addendum to this letter with issues raised by an objector.

Should you wish to discuss this matter further please contact me on 0428 667 071 or via email ckane@greaterhume.nsw.gov.au .

Yours faithfully



Colin Kane
Director Environment & Planning
GREATER HUME COUNCIL

23 June 2020

Our Ref: CK:SG

Addendum to Letter

- Loss of High Quality Land due to proposed Important Agricultural Land Mapping indicating that this land should be constrained under the Large Scale Solar Guidelines (loss of cropping land).
- The development does not meet Greater Hume Shire RU1 zone objectives.
- Reduced level of amenity for nearby residents.
- All cabling should be removed at remediation.
- The adjustments to native vegetation removal, reduction of tree removal from 99 to 77 and the loss of aboriginal heritage continues to demonstrate the constrained nature of the proposed development site.
- A very significant reduction in size of the development to the primary property of "Roseworthy" only (therefore not L shaping the property) and a smaller development centralised on that property away from all waterways and bushfire prone lands and a significant distance away from any environmentally sensitive areas such as the waterway that travels to the property and fenced on the property under a Landcare riparian project.
- Absolutely surround the development by trees on all sides so there is no visibility or heat island impacts from the project as recommended by the Clean Energy Council presentation.
- Place an earth bank around the project and place trees on top of this earth bank to reduce the visual, heat and noise impacts. This would insulate the surrounding properties and drive heat upwards.
- Compensation made to neighbours for their losses.