

10 September 2018

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Re: J17300 - New England Solar Farm - Amendment to project description (SSD 9255)

Dear Iwan,

This letter has been prepared to seek inclusion of a construction accommodation village as part of the New England Solar Farm (SSD 9255). To support inclusion of this temporary infrastructure, the following information is provided:

- a description of the proposed construction accommodation village and the proposed site for this temporary infrastructure;
- a justification for the inclusion of this temporary infrastructure as part of the New England Solar Farm:
- a map showing the Lot/DP on which the proposed construction accommodation village will be constructed; and
- recommended changes to the project summary description in the Secretary's environmental assessment requirements (SEARs).

### 1 Background

UPC Renewables Australia Pty Ltd (UPC) proposes to develop the New England Solar Farm; a significant grid-connected solar farm along with associated infrastructure, approximately 6 kilometres (km) east of the township of Uralla in the Uralla Shire local government area (LGA) (the project).

The project is a State Significant Development (SSD) under the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP). Therefore, a development application (DA) for the project is required to be submitted under Part 4, Division 4.1 of the NSW *Environmental Planning and Assessment Act* 1979 (EP&A Act).

The preliminary environmental assessment (PEA) for the project was submitted to NSW Department of Planning and Environment (DPE) on 18 April 2018. SEARs for the project were subsequently issued by DPE on 8 May 2018.

The project includes, as described in summary in the SEARs:

 the construction and operation of a photovoltaic (PV) generation facility with an estimated capacity of up to 800 megawatts (MW); and • the development of associated infrastructure, including a grid connection and battery storage facilities.

As noted in Section 6.7.2 of the PEA, it is anticipated that accommodation for the project's construction workforce will be sourced from nearby townships, such as, Armidale, Uralla, Walcha and Tamworth, or through workers camps to be established on-site, or via a combination of these two approaches.

At the time of submitting the PEA, UPC had commenced discussions with potential contractors and the local community on the optimal approach for the construction of the project and noted that they would investigate this further as part of the preparation of the environmental impact statement (EIS).

The location of the workers camp (herein referred to as the construction accommodation village) was not described in the PEA. UPC has undertaken further investigation and is now in a position to clarify the location of the construction accommodation village and provide justification for the inclusion of this additional infrastructure in the EIS and DA.

# 2 Proposed construction accommodation village

### 2.1 Description of the activity

A construction accommodation village for non-local construction employees (where skills cannot be sourced locally) may be established as part of the early stages of the project's construction. The construction accommodation village will accommodate approximately 250 workers. A significant proportion of the project's non-local construction workers may be required to reside at the construction accommodation village while they are rostered on.

To build the construction accommodation village, topsoil will be stripped where necessary, hardstand constructed and walkways and car parks constructed. The construction accommodation village will be managed by an experienced operator (most likely the lead contractor appointed for the construction of the project). Where plausible, local businesses will be engaged to supply goods and services to the construction accommodation village, typically consisting of laundry, cleaning and catering.

The construction accommodation village is expected to be dismantled and its footprint rehabilitated once the project is built and it moves into the operational phase.

The construction accommodation village will be on part of Lot 2 of DP 174053 in the northern array area (the subject land) (refer Figure 1). The subject land is currently primarily used for sheep grazing for production of wool and lambs and is zoned RU1 Primary Production under the Uralla Local Environmental Plan 2012. The subject land is accessible from Big Ridge Road (Figure 1). The exact location of the construction accommodation village within the subject land will be determined during the detailed design stage of the project.

The subject land is mostly cleared with dominant vegetation of low diversity native pasture. A limited number of scattered native trees are present, including Blakely's Red Gum (*Eucalyptus blakelyi*) and Roughbarked Apple (*Angophora floribunda*). Historically, the vegetation present on the subject land would have likely been representative of Plant Community Type (PCT) 510 - Blakely's Red Gum - Yellow Box grassy woodland of the New England Tableland Bioregion. A number of planted wind breaks are also present, mostly comprising exotic species. There is also a planted native wind break, composed of both indigenous and non-indigenous species.

Part of the subject land is mapped as biophysical strategic agricultural land (BSAL) as defined by the Strategic Agricultural Land Map – New England North West regional mapping presented in State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007 (the Mining SEPP).

Photographs 1 and 2 illustrate the general condition of the subject land.



Photograph 1 General condition of the subject land looking south-west



Photograph 2 General condition of the subject land looking south-east

### 2.2 Justification for the activity

Based on a review of DPE's Major Projects register and consultation with both Armidale Regional Council and Uralla Shire Council, it is understood that there are a number of other projects that may proceed to construction within close proximity of the township of Uralla and the project site. These projects include:

- Uralla Solar Farm a proposed commercial scale solar PV site approximately 11 km north-east of Uralla with a generating capacity of 400 MW;
- Metz Solar Farm an approved utility-scale PV solar farm at Metz, approximately 18 km east of Armidale;
- Armidale High School's redevelopment a proposed redevelopment of the existing high school to establish a new, purpose-built high school with a capacity of approximately 1,580 students;
- continued expansion of the University of New England's Armidale campus to accommodate additional colleges and a small-scale solar farm;
- Armidale Regional Airport's industrial park development, which will include a multi-purpose commercial land development, a business park, highway service centre and fully-serviced aviation related lots; and
- sustained upgrades to Armidale Regional Airport.

An influx of workers requiring accommodation to facilitate the construction of these projects could place pressure on local short-term accommodation and other services within the townships of Armidale and Uralla, which may have adverse flow-on effects. For example, construction workers may restrict the availability of supply of short-term accommodation to other users during peak tourist periods such as school holidays and the region's major festivals and annual events.

As part of the preparation of the EIS, a review of available temporary accommodation facilities in the vicinity of the project site has been performed by EMM Consulting Pty Ltd (EMM). Based on an average occupancy of 65% for short-term accommodation, there is estimated to be a total of 365 suitable rooms available at any one time within an approximate 80 km radius of Uralla. This indicates that there is some capacity to absorb a proportion of the project's construction workforce. However, this doesn't account for peak periods or annual events. If the project were to rely on short-term accommodation and occupy all available rooms at any given time, there would likely be a negative impact on local tourism throughout the project's construction period. This concern was raised by the local community during the consultation activities that UPC has undertaken and, in response to this, UPC further explored the construction accommodation village as a potential option for avoiding these negative impacts.

UPC and the selected construction contractor will assess the requirement for a construction accommodation village closer to the commencement of construction once there is more clarity around the source and volume of the project's construction workforce.

#### 2.3 Assessment approach

Identification of the proposed location for the construction accommodation village has considered a range of constraints and issues identified and informed by field survey and assessment work undertaken to date in support of preparation of the EIS. Further consideration in determining placement of the construction accommodation village within the subject land will include, but not be limited to the following criteria:

- proximity to watercourses and associated riparian corridors (where required);
- proximity to TransGrid's existing 330 kV transmission line;

- proximity to existing services;
- proximity to sensitive receptors;
- potential impacts on native vegetation, land mapped as BSAL and/or identified items of Aboriginal cultural heritage and historic heritage significance;
- accessibility from Big Ridge Road; and
- detailed design of the project, namely placement of PV modules and associated infrastructure.

Particular emphasis during project planning will continue to be given to enhancing the project's socioeconomic benefits. UPC has been engaging with local people, businesses and others to identify opportunities for local business participation and community enhancement. Local firms including trades such as electricians plumbers and carpenters, cleaning and catering services are likely to be used to service the construction accommodation village, where available. The direct benefits of these initiatives to the local community will be described in the EIS and other opportunities for maximising local benefits explored.

Potential impacts associated with the construction accommodation village will be considered within the EIS and a number of the project's technical assessments, including the traffic impact assessment, economic impact assessment, social impact assessment and visual impact assessment. The EIS will also include consideration of bushfire hazards and waste management.

# 3 Revised project summary

UPC proposes the following amendment to the project as described in the SEARs:

New England Solar Farm which includes:

- the construction and operation of a photovoltaic (PV) <u>electricity</u> generation facility with an estimated capacity of up to 800 megawatts (MW); <del>and</del>
- the development of associated infrastructure, including a grid connection <u>substation</u> and battery storage facilities; <u>and</u>
- <u>a temporary construction accommodation village and associated ancillary infrastructure (should it be required).</u>

An additional construction accommodation village may also be required within proximity of the southern array area; however, this does not form part of the recommended changes to the project summary in the SEARs.

Yours sincerely

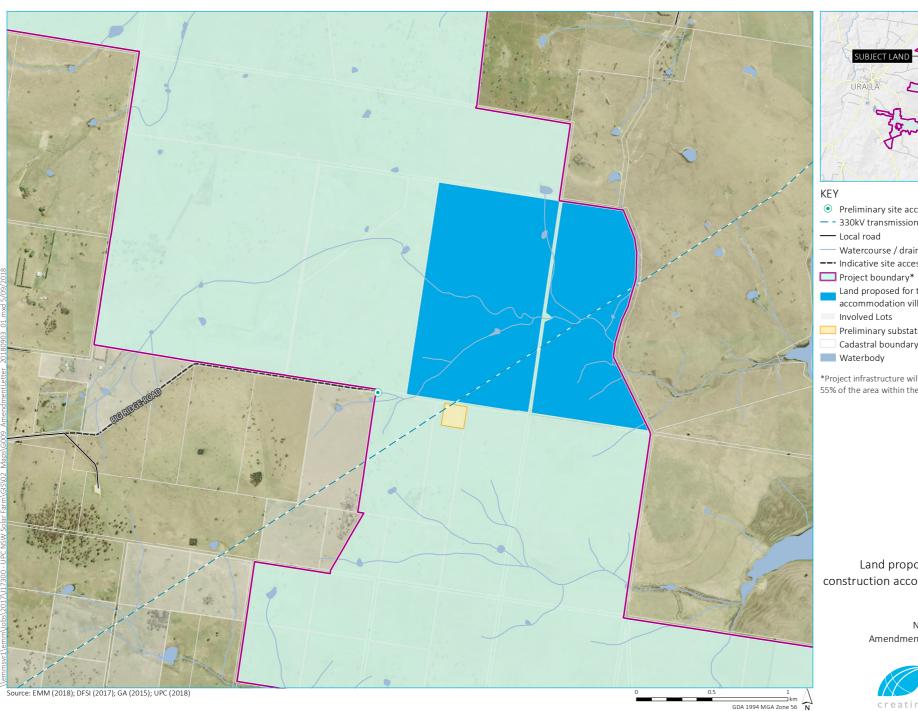
**David Richards** 

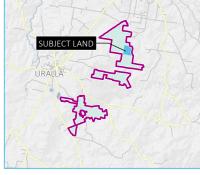
**Environmental Scientist** 

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Figure 1 – Land proposed	for temporary construction	accommodation village





- Preliminary site access locations
- - 330kV transmission line
- Watercourse / drainage line
- --- Indicative site access road
- Land proposed for temporary construction
- accommodation village
- Preliminary substation sites
- Cadastral boundary

\*Project infrastructure will occupy approximately 55% of the area within the project boundary.

Land proposed for temporary construction accommodation village

> New England Solar Farm Amendment to project description Figure 1

