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9 August 2023

Energy, Resources & Industry Assessments
Department of Planning
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Jai Reid
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Nestor Tsambos
Nestor.tsambos@dpie.nsw.gov.au

Dear Jai and Nestor

Narragamba Solar Farm (SSD-60575715) – request for input into SEARS

On 27 July 2023 Warrumbungle Shire Council was forwarded a copy of the draft Planning Secretary's Environmental Assessment Requirements (SEARS) for the proposed Narragamba Solar Farm and asked to provide our input into the SEARS. Comments were due back to Department of Planning by 9 August 2023.

After reviewing the draft SEARS and the accompanying *Narragamba Solar Farm Scoping Report* dated July 2023, Warrumbungle Shire Council makes the following comments and seeks these matters to be included in the final SEARS:

1. There are a number of threatened ecological communities across the project site, Council expects the EIS will contain a full assessment, not just a desktop survey, and biodiversity credits will need to be achieved. The location of offsets is of interest to Council particularly if located within the Warrumbungle LGA.
2. Areas surrounding the project site have presence of Aboriginal artefacts - appropriate onsite land searches need to take place to identify any artefacts that are present to enable management and mitigation measures to be implemented.
3. Cumulative impacts from renewable energy projects within the CWO-REZ ('REZ') are of particular concern to Council. It is requested that these specific matters be included in the SEARS:

- a) Cumulative traffic noise for the towns within Warrumbungle Shire Council ('WSC') from the projects and developments associated with the REZ. From our current knowledge and discussions with various renewable energy generator developers and EnergyCo, many proposed development timeframes appear to be aligned and may occur at the same time or overlap. Council prefers a staged approach for the developments within the REZ and seeks for this to be addressed in the SEARS.
 - b) The cumulative impacts section of the Scoping Study states that all projects within a 50km radius of the proposed site were considered in the cumulative impact screening, however not all the projects identified on Fig 8-23, within the 50km buffer are included in the screening assessment. It is noted that Orana Wind Farm Project is not included in Table 8-30.
 - c) It is noted that the Scoping Study states that EnergyCo is coordinating the whole of the REZ studies including road upgrades, training and skills development, workforce accommodation, telecommunication improvements, and waste management, amongst others (Energy Corp of NSW 2023a). The studies undertaken to date by EnergyCo are generally of a cursory nature and not robust enough to be relied upon as a basis for assessing a REZ developer's project. Council requires each and every developer to address all cumulative impacts in a robust and transparent manner.
 - d) We understand that there is a Generator Project Interface Group for managing cumulative impacts within the CWO-REZ, which will consist of proponents only. Whilst this is a good approach to managing this complex issue, Council believes that there should be independent oversight of the group and strict success criteria. Council should have access to this group and all proceedings should be transparent and publicly available.
 - e) Table 8-32 within the Scoping Study includes a list of key matters that would be considered. It is noted that this list does not include water, waste, or infrastructure (such as telecommunications). Council requests that the SEARS include a detailed cumulative impact assessment. The Scoping Study does not make specific mention of the additional burden to be placed on the local telecommunication network. The draft SEARS doesn't include the requirement to assess the suitability of the local infrastructure to absorb the additional load. Council requests that this matter be included in the SEARS.
4. The stakeholder engagement list should include Local Emergency Management Committees, Siding Spring Observatory. Media should also include local newspapers that cover Dunedoo district.
 5. Council seeks a Planning Agreement with the Developer. The Planning Agreement must be agreed by the parties prior to the granting of any development consent.

6. Whilst the need for a construction camp is mentioned within the Scoping Study, the location is not yet determined. Council will require full specifications relating to the operation and management of each construction camp. This should include size (in ha), list of facilities, management of residents, transport of workers (buses or private vehicles) and general arrangement including fencing locations and specifications.
7. Information on employment and workforce numbers is minimal, and robust, accurate figures should be provided. What percentage of locals to be employed and trained?
8. How will additional impacts on emergency services (such as police, fire, ambulance, hospitals etc) as a result of the project be addressed? It is noted that WSC is included in Appendix 5-Social, as being within the Social Locality (Fig 7-13) and Dunedoo is included in the Stakeholder list (Appendix 1). However, it is noted that WSC is not directly considered within the Scoping Study or draft SEARS in relation to social impact assessment. It is particularly important that WSC be included within the SEARS in relation to social impact and stakeholder engagement, particularly regarding impacts to services such as medical and health, police, fire, ambulance and mental health. Council will require additional information to assess the impact and determine contribution requirements in relation to a Planning Agreement.
9. It is noted that there are no drought contingencies mentioned in the SEARS or Scoping Study. Council requests that the SEARS include drought contingencies for construction and potable water that does not include town water supply.
10. The Scoping Report refers to telecommunications for SCADA, how will this be maintained and operational where mobile service is insufficient?
11. Warrumbungle Shire Council is unable to accept any wastes from the project, options for waste disposal should not include use of Council owned waste facilities within Warrumbungle Shire.
12. Could the EIS please expand on what the term “repowering in consultation with associated residences” means. It was mentioned on a couple of occasions in the Scoping Report?
13. The project is located within 200km radius of the Dark Sky Park associated with Siding Spring Observatory – the application needs referral to the Observatory for comment given that permanent lighting will be installed. Further to that, the *Dark Sky Planning Guidelines 2016* (as referred to in the Scoping Report) were recently updated in June 2023.
14. Where will aggregate supply sources be obtained from, and what volumes will be required? Sourcing of sand and aggregate has not been addressed in the Scoping Study. Council seeks to know where these materials will be sourced and the associated transport route for delivery. Council will require this information to be included in the traffic management plan/route assessment.
15. Will investigative permits be sought from Council under s138 of the *Roads Act 1993*?

16. It is noted that there is an error with the stated transport route. The Golden Highway does not go through Leadville (Scoping Study - section 8.4.2)
17. How can “excess Stubbo Solar Farm land” be utilised for Narragamba Solar Farm when it has prior approval for the Stubbo project; will a Modification Application to the Stubbo Solar Farm project be lodged to reduce the size of the Stubbo project footprint?
18. The scoping report makes a statement on Page 60 that Native Title is expected to have been extinguished. What happens if it hasn't been extinguished prior to DA determination (or consent)?
19. What bushfire management arrangements will be in place over the life of the project? The Scoping Report refers to the fire at Beryl Solar Farm in April 2023 – it is noted at the time that RFS trucks could not access the fire to extinguish it as it was underneath the solar panels. What mitigation measures will be in place to address fire risk all year round, not just in high fire danger periods. It is noted that the assessment of fire management does not include details of on-site fire-fighting equipment. It is requested that all renewable energy project sites and construction camps be self-sufficient for fire response including availability of fire-suppression equipment, access, and water, with details included in the Bush Fire Emergency Management and Operations Plan.
20. The council requests that all climate change implications are fully and properly addressed, including firestorm and hailstorm.
21. Council requests the following specific matters be included in the SEARS regarding roads, traffic and transport:
 - a) An assessment of the capacity of the existing Warrumbungle Shire Council road network accessing the project study area including bridges, culverts and causeways to accommodate the type, mass (axle and gross) and volume of traffic generated by the project (including restricted access vehicles and over-mass/over dimensional traffic haulage routes from port) during construction, operation and maintenance will be required.
 - b) An assessment of current road conditions of the existing Warrumbungle Shire Council road network accessing the project study area to determine if any widening, resurfacing, maintenance or sealing will be required.
 - c) An assessment of the likely transport impacts to the existing Warrumbungle Shire Council road network accessing the project study area to the site access and haulage routes in relation to the capacity and condition of the roads, bridges, culverts and causeways will be required.
 - d) Details of measures to mitigate and/or manage potential impacts to the existing Warrumbungle Shire Council road network accessing the project study area including a schedule of all required road/intersection upgrades, road maintenance contributions, and any other traffic control and safety measures

developed in consultation with the relevant road authorities will be required.

- e) A review and safety assessment of crash data (along the proposed haulage route and worker access route) to determine if there are any accident clusters or existing safety issues, and if there are, how these will be mitigated.
 - f) The details behind the predicted number of heavy, over-size, over-mass vehicles, heavy vehicles, and light vehicles, including construction vehicles being used to/from site. This needs to include the delivery of water, aggregate, sand, and concrete. It is understood that haulage routes will include Warrumbungle Shire Council local roads. These local roads are not specified. Council requires robust and transparent numbers of heavy, over-size, over-mass and light vehicles with full details shown. The impact on school bus runs and harvest season transport is also required.
 - g) Details of measures to mitigate and/or manage potential impacts including a schedule of all required road and intersection upgrades (including resulting from restricted access and over mass / over-dimensional traffic haulage routes), road maintenance financial contributions, other traffic control and safety measures including dust management and other traffic control measures, developed in consultation with the relevant road authorities. Specifically, the planned upgrades to Merotherie Road and other local roads in Warrumbungle Shire Council including post-construction maintenance/rectification works.
 - h) The roads utilised in the Warrumbungle Shire Council may also be the highways. There may be some impact on the heavy vehicle rest area in Dunedoo. Additional assessment will be conducted by Council on receipt of application for HV access via the NHVR if they require access to Councils road network for restricted access for OSOM vehicles.
 - i) It is likely that vehicles or trucks not requiring permits may use other roads than those listed in the Scoping Report. If Warrumbungle Shire Council roads are required to be used, Council will require additional information to assess the impact on and to determine if any contribution is required.
 - j) The Scoping Report refers to traffic data collected in 2021 along the Golden Highway out of Merriwa. How is this relevant considering traffic movements may have been lower at the time the counts were taken due to Covid-19 restrictions/lockdowns; and people leaving the Highway for Cassilis, Mudgee via Ulan Rd or Vinegaroy Road before they arrive at/pass the access to the project study area (cnr Golden Highway/_ Merotherie Rd)?
22. Further searches need to be undertaken for local heritage items within Warrumbungle Shire. Council's Heritage Study (available on Councils website) lists all items that will be included in Schedule 5 of the WLEP once the LEP review is completed (currently underway). The property 'Moreton Bay' located at 13374 Golden Highway, Dunedoo is listed in the Heritage Study as the shearing shed, shearing quarters and private graves are

considered by our heritage adviser to be notable heritage items. The property is located 11.9km from the project site.

Should you have any comments or questions in relation to the above matters please contact Council on 02 68 492000.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Leanne Ryan', with a long, sweeping horizontal flourish extending to the right.

**LEEANNE RYAN
DIRECTOR ENVIRONMENT AND DEVELOPMENT SERVICES
WARRUMBUNGLA SHIRE COUNCIL**