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13 May 2022

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

kurtis.wathen@dpie.nsw.gov.au

Dear Kurtis

Sandy Creek Solar Farm (SSD-41287735) – request for input into SEARS

On 22 April 2022 Council was forwarded a copy of the draft Planning Secretary's Environmental Assessment Requirements (SEARS) for the proposed Sandy Creek Solar Farm and asked to provide our input into the SEARS. Our comments were due back to Department of Planning (DOP) by 13 May 2022.

After reviewing the SEARS and the accompanying *Sandy Creek Solar Farm Scoping Report* dated April 2022, Council makes the following comments and seeks these matters to be included in the SEARS:

1. Any subdivision of land will need to be undertaken in accordance with relevant clauses of *Warrumbungle Shire Council Local Environmental Plan 2013 (WLEP)* for the land area involved. Council's minimum lot size for RU1 Zone is 600HA. The Scoping Study advises subdivision and consolidation of lots will occur, this matter needs to be included in the SEARS.
2. 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.
3. The Cobbora Land Use Planning Strategy (Addendum to the Warrumbungle Shire Land Use Strategy) applies to part of the project area and should be considered and included as part of the SEARS.

4. A number of 'paper' Crown Roads are proposed to be marked for closure, Council requests a full assessment of surrounding land parcels to ensure no landlocking will occur as result of the proposed road closures, as well as an assessment that the roads are not currently being utilised as access roads.
5. Areas surrounding the project site have presence of Aboriginal artefacts - appropriate land searches need to take place to identify any artefacts that are present to enable management and mitigation measures to be implemented.
6. Cumulative impacts on our communities, roads and local infrastructure from the developments and projects associated with the Renewable Energy Zone (REZ) are of major concern to Council. From our current knowledge of the REZ and discussions with various renewable energy developers, many proposed development timeframes appear to be aligning and will occur at the same time. Council prefers a staged approach for State Significant Development (SSD) within the REZ, and seeks for this to be included in the SEARS.
7. Dapper Union Church is listed as a heritage item within Council's adopted Community Based Heritage Study, and will be included in the Heritage Schedule as part of our LEP Review. Consideration of impacts to heritage items need to be taken into account as part of the proposed development.
8. It is noted Liverpool Range Wind Farm is missing from the list within Table 2.1 of the Scoping Study as a Major projects with potential for cumulative impacts. Liverpool Range Wind Farm is a major SSD that has been approved and will add to the cumulative impacts felt by the region as a result of the REZ and associated SSD projects. Please include these impacts into the cumulative impacts assessment that is intended to be carried out.
9. With two (2) LGA's involved there needs to be consideration given to the structure of the VPA. Council will be seeking for the VPA quantum to be based on megawatts (MW) generated with the VPA covering all phases of the project; including being supportive of recognising the damage that vehicles in all phases of the project will do to our road network including bridges and major culverts.
10. Whilst the project claims to provide long-term strategic benefits to the state of NSW, a more reliable energy supply for the Warrumbungle LGA would be welcomed. Please include a clause in the SEARS that the developer is to seek initiatives to generate and provide a more reliable electricity source from the project to the local communities within our LGA. It seems at odds that our LGA is being used to generate power to be used in other areas of the State, yet our own LGA struggles to have a reliable supply.
11. The Scoping Study refers to national parks located within the vicinity of the site – it is noted Coolah Tops National Park has been omitted from the list and should be included.
12. It is noted a communication tower 35m high is proposed, consideration to aerial activities such as aerial spraying requires needs to be included as part of the SEARS.

13. The Scoping Study refers to site office, compounds, storage shed etc; construction materials should be non-reflective as per the controls within Council's Development Control Plan (DCP).
14. The stakeholder engagement list is missing some key organisations; Dunedoo Coolah Landcare, Local Emergency Management Committee, Siding Spring Observatory; these stakeholders should be included.
15. The SEARS should seek to address accommodation requirements for construction workers and others employed on the project. Minimal information on available housing and accommodation for construction workers has been included in the Scoping Study.
16. Irrigation infrastructure is referred to in the Scoping Study on pg 32, the SEARS should seek information on what will be irrigated, size of area, water supply and allocation and address any licencing requirements.
17. It is noted waste streams are mentioned in the SEARS, though the volumes (amount) of each waste stream has not been requested, Council seeks for this to be included. Council requests all waste materials to be recycled where possible during the life of the project.
18. 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.
19. In relation to transport, Council requests these specific matters to also be included in the SEARS –
 - an assessment of the capacity of the existing road network including bridges and major culverts 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 decommissioning;
 - an assessment of the likely transport impacts to the site access and haulage routes, site access point, any rail safety issues, any Crown Land (including existing Travelling Stock Route network) particularly in relation to the capacity and conditions of the roads, bridges and major culvert and use of rail level crossings (and rail safety assessment if required), and impacts to rail underbridges and overbridges;
 - provide details of measures to mitigate and / or manage potential impacts including a schedule of all required road upgrades (including resulting from restricted access and over mass / over dimensional traffic haulage routes), road maintenance contributions, and any other traffic control and safety measures including dust management, and any other traffic control measures, developed in consultation with the relevant road authorities.
20. It appears that some local roads in Warrumbungle Shire will be used for heavy vehicles associated with the project. The roads utilised in Warrumbungle LGA may also be the highways, and 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 Council's road network for restricted access and OSOM vehicles. Council would be requesting a Traffic Management Plan/Route Assessment as part of the approval process for restricted access and OSOM vehicles.

21. It is likely that light vehicles or trucks not requiring permits will use other roads than those listed in the Scoping Study. If Council roads are required to be used, Council will require additional information to assess the impact and to determine contribution required.
22. Noise impacts from heavy vehicle movements particularly in the construction phase has not been directly considered in either the draft SEARS or the Scoping Study. This is of particular importance for the community of Dunedoo.
23. All property accesses will need to meet Council's minimum standards.
24. Appendix A of the Scoping Study – pg 12 – refers to Tenterfield Shire Council; we are not sure what this has to do with the development.

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

Yours sincerely



LEEANNE RYAN
DIRECTOR ENVIRONMENT AND DEVELOPMENT SERVICES