

Coonabarabran:

14-22 John Street
Coonabarabran NSW 2357

PO Box 191
Coonabarabran NSW 2357

ABN: 63 348 671 239



Calls from within Shire
1300 795 099

Calls from outside Shire area
Coonabarabran:
02 6849 2000

Coolah: 02 6378 5000

Fax: 02 6842 1337

Email:
info@warrumbungle.nsw.gov.au

Coonabarabran - Coolah - Dunedoo - Baradine - Binnaway - Mendooran

Please address all mail to:
The General Manager

Please refer enquiries to:

L Ryan
Doc ID 167850

7 February 2023

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

julia.a.green@dpie.nsw.gov.au

Dear Julia

Dapper Solar Farm (SSD-52217961) – request for input into SEARS

On 16 December 2022 Council was forwarded a copy of the draft Planning Secretary's Environmental Assessment Requirements (SEARS) for the proposed Dapper Solar Farm and asked to provide our input into the SEARS. Our comments were due back to Department of Planning by 19 January 2023, and unfortunately were delayed.

After reviewing the draft SEARS and the accompanying *Sandy Creek Solar Farm Scoping Report* dated 30 November 2022, Council makes the following comments and seeks these matters to be included in the 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. The Cobbora Land Use Planning Strategy (Addendum to the Warrumbungle Shire Land Use Strategy) should be considered.
3. 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.
4. 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. **Note: this is a vital topic. For Council to conduct a merit-based assessment of the project, it requires cumulative impact data on the topics listed within this submission.**

5. 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.
6. With two (2) LGA's involved there needs to be consideration given to the structure of the Planning Agreement. Council will be seeking a Planning Agreement 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. Council will be seeking a Planning Agreement, based on 1.5% of the Capital Investment Value of the project. Early dialogue is recommended with Council by the Proponent.
7. 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.
8. The stakeholder engagement list is missing some key organisations; Local Emergency Management Committee, Siding Spring Observatory; these stakeholders should be included. Media should also include Dunedoo Diary.
9. The SEARS should seek to address accommodation requirements for construction workers and others employed on the project. No information on available housing and accommodation for construction workers has been included in the Scoping Study. Where and how will this be addressed?
10. What will be the impact on tourist accommodation availability when all available accommodation in surrounding communities is utilised by this project and other REZ related projects?
11. Information on employment and workforce numbers is minimal, and robust, accurate figures should be provided. What percentage of locals to be employed and trained?
12. How will additional impacts on emergency services (such as police, fire ambulance, hospitals etc) as a result of the project be addressed?
13. What management arrangements of solid and liquid waste generated during construction and operation (types, tonnages, destinations) are intended? Please be advised, Council is unable to accept any wastes from the project, and the SEARS should seek the Proponent to investigate options for waste disposal outside of Warrumbungle Shire.

14. 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.
15. Please inform Council how, when and where consultation might be conducted with our communities?
16. Where will water supply sources be obtained from, and what volumes will be required?
17. Where will aggregate supply sources be obtained from, and what volumes will be required?
18. 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) 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.
19. Please advise:
 - heavy vehicle and oversize/overmass numbers/frequency/routes
 - assumptions behind those numbers; also include traffic numbers for refurbishment of solar panels during life of project; and also decommissioning phase
 - road upgrade requirements
 - road maintenance funding to be provided to Council during life of the project
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. All property accesses will need to meet Council's minimum standards.
23. What bushfire management arrangements will be place over the life of the project?
24. What are the decommissioning plans for the development?
25. Where will the project transmission line be located relative to Energy Co's main line?
26. How will allocation be determined of the REZ Access Fees?

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