

Mr Rob Beckett
Environmental Assessment Officer
Energy Assessments
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Beckett

Greater Hume Council Endorsed Submission to the Environmental Impact Statement (EIS) – Walla Walla Solar Farm

I refer to the notice of exhibition of the EIS for the Walla Walla solar farm (proposed development) which was received by Council on 25 October 2019. It is advised that Council has reviewed the Environmental Impact Statement and at its November Ordinary meeting held on 20 November 2019 Council resolved to **raise concerns/formally object** to the proposed development for the following reasons:

1. Reduced Levels of Amenity for Nearby Residents

The EIS identifies that there are 4 uninvolved neighbouring properties that have residences or working land that will have a direct outlook onto the subject land. Council considers that residents from these properties will experience reduced amenity as the outlook from their property will change from being an agricultural landscape to one that is of an industrial appearance with a development footprint of 605 hectares. This footprint incorporates approximately 900,000 solar panels on tracker units, operation and maintenance buildings, access roads, inverter stations, high voltage substation and 2.4 metre high perimeter fencing. Council believes that the proposed landscaping will not provide a timely response to address the amenity loss of nearby receivers.

For one resident reduced amenity levels has the potential to have an adverse impact upon their business which is running a function centre. That business provides wedding packages and is a venue for other occasions. The business has been operating from the property for many years, enjoys good levels of patronage and is a going concern.

To provide a venue that can compete in a very competitive business environment the owners have invested significant funds into their business to provide an attractive venue. They recently have added tourist accommodation facilities and associated infrastructure.

It will be the construction period for the Walla Walla solar farm that will be the most detrimental to the function centre business as the transformation of the site will result in visual, noise and dust impacts. It is easy to envisage that such works will be off putting to potential clients who will want a high level of ambience for their event and potential clients will be lost to numerous competitors within the region whose venues will offer a

more ambient setting. The operational phase of the Walla Walla solar farm will have reduced impacts for nearby residents including the function centre however, it will be many years before proposed vegetation screening will be of a sufficient size to mask the appearance of the solar farm development.

2. **Social, Environmental and Economic Impacts**

It would be an adverse social and economic outcome if the Walla Walla solar farm was detrimental to the function centre business as it provides employment for local people and is supported by other businesses including those involved in transportation and catering. The function centre provides some diversification for the broader local economy.

Council is concerned about the potential for the heat island effect to adversely impact upon localised climatic conditions and result in heat transmission out of the solar farm and into neighbouring properties. The EIS relies upon several studies that have been undertaken internationally to discuss the heat island effect caused by PV arrays however there is no cited Australian studies on the heat island effect. This is of concern to Council as it may not be appropriate to extrapolate the results of international studies on the heat island effect to localised conditions where this development is large, another nearby proposed development bigger again, there is receivers that are as close as 80 metres from the property boundary and the mean summer maximum temperature is 32.3°C.

The EIS should have discussed what mitigation measures, other than a setback and planting of a vegetation screen, that the proponent could take to minimise adverse outcomes caused by the heat island effect.

Council is concerned about the proposed development producing a dust nuisance during construction but particularly during its operational phase. The local area enjoys a reasonably high average rainfall and so it is not common for land in the vicinity of the proposed development to be devoid of vegetation. Consequently, nearby receptors currently do not experience any significant issues in relation to dust. Council believes that the use of tracking systems and efficient PV cells will dramatically reduce the amount of solar energy reaching the soil beneath the solar arrays and, over the thirty year life of the development, it could be increasingly difficult to maintain vegetation cover. Given the scale of the development site (605 hectares), there may be the potential for barren earth beneath solar arrays to be a significant source of dust for nearby receptors.

In a discussion on socioeconomic impacts arising from the Walla Walla solar farm the EIS mentions that benefits will arise to local farmers and the community who will benefit from an additional source of income that is independent of agriculture. During the construction phase the EIS indicates there will be 250 staff employed with many of these drawn from the local community. The EIS reveals that peak employment is for a period of time being 8-12 months with the numbers employed dramatically reducing outside of this period. It is felt that most of the benefits from the construction employment will not be able to be capitalised upon by the Walla Walla and Culcairn community as there is very limited temporary accommodation available. Workers will most likely be accommodated in the nearby regional centre of Albury/Wodonga. The EIS provides the impression that much of the equipment such as the PV cells, tracking arrays, inverter stations and are all to be purchased from the global market.

It is pleasing to note that employment and annual expenditure of the Walla Walla solar farm will be substantially larger than other similar developments that Council has reviewed with the operational period employment being 21 full time staff members

consisting of 11 onsite, 5 in head office and 5 local contractors and projected annual expenditure of \$10 million dollars.

It is advised that the proponent has had minimal engagement with Council in relation to a payment to Council of a development contribution associated with the proposed development.

Since 2012 Greater Hume Council has had a shire wide fixed development consent levy either complying with Section 94A or it replacement Section 7.12 of the Environmental Planning and Assessment Act 1979.

Council has applied the provisions of its fixed development contribution plan on 283 occasions irrespective whether there is an impact of the development on local infrastructure with the funds being used for provision, extension, augmentation of public amenities and public services.

Given Greater Hume Council's long standing application of a fixed development contributions levy and the impact of the development on the local community, a failure by the proponent to pay a development contribution to Council that is commensurate with the current Greater Hume Council's Section 7.12 Development Contribution Plan 2019 would also be an adverse social outcome.

3. **Loss of High Quality Agricultural Land**

Council has reviewed the Department of Planning, Industry and Environment's Large Solar Energy Guidelines in which there is a discussion about the importance of site selection. Agriculture is identified as a key site constraint and the guideline refers to land meeting the following:

Important agricultural lands, including Biophysical Strategic Agricultural Land (BSAL), irrigated cropping land, and land and soil capability classes 1, 2 and 3. Consideration should also be given to any significant fragmentation or displacement of existing agricultural industries and any cumulative impacts of multiple developments.

The EIS indicates that proposal is located on soil capability Class 4 and Class 6 land. The current use of the land comprises sheep and cattle farming. Intermittently, the main subject land is also used for canola and wheat crops. There is no figure provided in the EIS that indicates the footprint of the development in relation to the respective soil classes. It is noted that DPI Agriculture commented through the SEARS that "*although the development is proposed for Class 4 and 6 land as assessed under the Land and Soil Capability Assessment scheme, the class 4 lands in this area are currently under review due to their value as high quality cropping farms.*"

Inspections by Council of the development site and adjacent land would indicate that it is high quality agricultural land. Council has been advised that this land will be mapped as important agricultural land under the Riverina Murray Draft Important Agricultural Land Mapping project which also indicates it is high quality agricultural land. Due to its impending status as important agricultural land, the site could be considered constrained under the Department of Planning, Industry and Environment's Large Solar Energy Guidelines.

The EIS indicates that existing native and exotic pastures will initially decline due to shading following PV array installation. There is a concern raised by Council that these effects maybe ongoing and the land may not benefit from thirty years of being beneath highly efficient photovoltaic cells mounted upon tracking units and indeed, may deteriorate if the vegetation is not able to be supported in this environment.

Due to the loss of the high quality agricultural land Council believes that the proposed development may not be compatible with the RU1 zone objectives contained in the Greater Hume Local Environment Plan 2012 which are:

- To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.
- To minimise the fragmentation and alienation of resource lands.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.
- To maintain the rural landscape character of the land.

4. Impacts on Native Vegetation and Aboriginal Heritage

The EIS has undertaken very detailed studies concerning the biodiversity impacts and impacts on Aboriginal cultural heritage that will occur if the proposed development does proceed. Whilst Council is satisfied with the rigour of the assessment of these impacts, it is very concerned about the effect of the removal of 13.83 hectares of native vegetation, 53 paddock trees and a total loss of value of 24 items of Aboriginal cultural heritage.

Council's engineers have reviewed the Traffic Impact Statement contained within the EIS and they raise concerns that the unsealed portion of Benambra Road will be utilised to some degree during the construction of the facility. They believe that sealing of the Benambra Road to Schneiders Road at the full cost of the proponent should be considered.

The following traffic related recommended conditions are provided in the event of the approval of this application:

- Road works are to be undertaken in accordance with the submitted traffic assessment.
- For assessment by Council additional design plans are required for the access points from Benambra Road and across Schneiders Road.
- Under Section 138 of the Roads Act 1993 any works occurring within the road reserve require the consent of Council as the road authority.

Should you require further information please contact Colin Kane, Director Environment & Planning, on 02 6044 8928 or email ckane@greaterhume.nsw.gov.au.

Yours faithfully

Colin Kane
Director Environment & Planning
GREATER HUME COUNCIL

12 November 2019

Our Ref: CK: SG

Greater Hume Shire
Sharon Coulston
Holbrook.

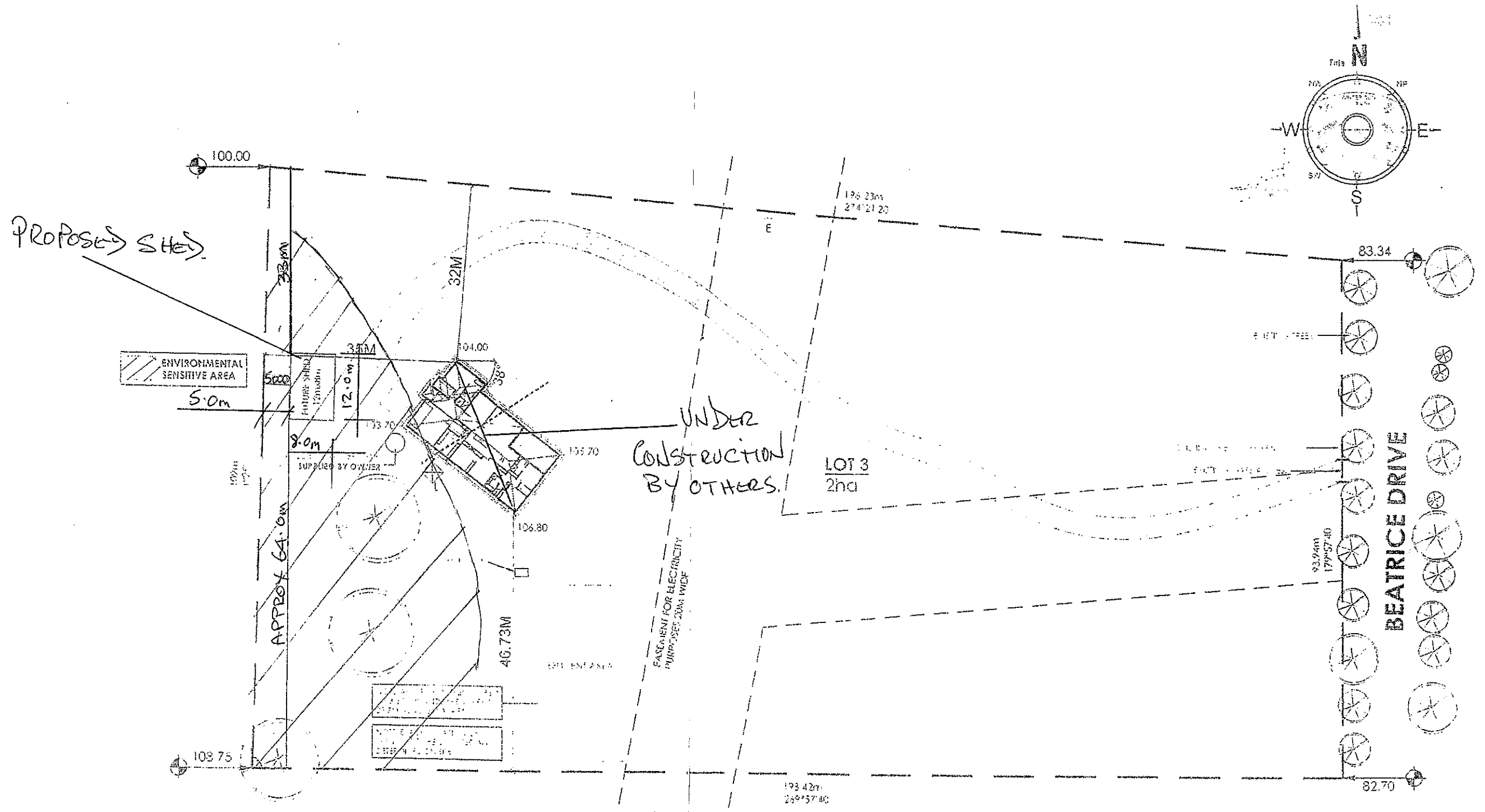
Dear Madam.

I received a building approval notice with regards to a shed to be constructed on 32 Beatrice Rd. Berrumbullock. Lot 3 DP. 1057430.

As per the plan the shed is to be erected on a environmental area which over looks my house (meant to be not built on). The shed will be erected on at least 1 metre of fill plus a ~~1.3~~^{3.4} meters to the eave plus 750 ml. to gable. This will be very visually obtrusive to from my home. Only 5m. from the boundary with no screening mentioned, the house to be also erected has not mentioned screening.

Your attention to this complaint would be appreciated.

Yours Sincerely
James Jelban
James Jelban



SITE PLAN
SCALE 1 : 750

WALTER & MARIA BRUCKMANN
NO 32 BEATRICE DRIVE
BURRUMBU TOCK NSW 2642

BUSHFIRE ATTACK LEVEL: BAL - LOW



The Honourable Kevin Anderson MP
Minister for Better Regulation and Innovation

Our reference: BN-00292-2019

Mr Steven Pinnuck
General Manager
Greater Hume Council
By email: spinnuck@greaterhume.nsw.gov.au

Dear Mr Pinnuck

I write to you to inform you of the outcome of Greater Hume Council's (Council's) recent application for community assistance under the Voluntary Purchase and Demolition Program.

As you are aware, on 8 May 2017, the former Minister for Innovation and Better Regulation announced community assistance would be available for local government areas disproportionately affected by high levels of loose-fill asbestos insulation. The NSW Government has previously approved community assistance funding of up to \$190,000 for the Greater Hume community.

I am pleased to inform you NSW Fair Trading has assessed Council's recent application and approved funding of \$76,825 for the establishment of a Holbrook Men's Shed and seating shelters in Culcairn. However, an amount of \$17,692.50 cannot be funded under the program, as it relates to the purchase of land which is specifically excluded under the Community Assistance Guidelines (the Guidelines).

I would like to acknowledge Council's commitment to provide an additional contribution equalling at least 20 per cent of the NSW Government's contribution, \$15,365, which will see these projects and their benefits realised in the wider Greater Hume community.

I have approved an extension of time for the lodgement of further requests for use of the remaining \$17,692.50 available under the program until 31 December 2019. Should Fair Trading receive any further successful applications for assistance, once approved, Fair Trading will facilitate the release of funds consistent with the intent of the Guidelines.

I understand the previous funding agreement has expired and a Fair Trading officer will contact you shortly to finalise a new funding agreement, which the Council will need to execute. The approved funding (\$76,825) will be provided upon receipt of a signed copy of the new funding agreement from Council.

Your commitment to the Greater Hume community is encouraging and I am confident Council will do all it can to ensure the benefits of this funding are realised. Thank you again for your ongoing commitment and cooperation with the NSW Government to achieve positive outcomes for the Greater Hume community.

If you have any further queries, please contact Mr Lee Watson, Coordinator Grants, Fair Trading on (02) 9619 8731.

Yours sincerely

Kevin Anderson MP
Minister for Better Regulation and Innovation

Date: 17.9.2019

HOLBROOK MENS SHED				
Project managed by Council on behalf of the Holbrook Men's Shed				
As ownership of the Mens Shed will vest with Holbrook Mens Shed the project cost will be inclusive of GST.				
<u>PROPOSED BUDGET</u>				
Expenditure item	\$	Community Assistance Funding	Other sources	Total
	Inc. GST			
Project Management @ ~ 5% of project cost	8,500.00			
Kit shed	38,260.00	38,260.00		38,260.00
Shed installation	16,280.00	16,280.00		16,280.00
Concrete floor (360 sqm @ \$88 sqm)	31,680.00	31,680.00		31,680.00
All abilities toilet	10,000.00		10,000.00	10,000.00
Car parking	10,000.00		10,000.00	10,000.00
Security fencing (110 metres @ \$120 pm)	13,200.00		13,200.00	13,200.00
Electrical	15,000.00		15,000.00	15,000.00
Plumbing	10,000.00		10,000.00	10,000.00
Emergency lighting, fire extinguishers, fire blankets etc.	5,000.00		5,000.00	5,000.00
Land purchase (discounted price from Council - see attached minute)	22,000.00	21,231.00	769.00	22,000.00
Contingency @ 10% of project cost	17,142.00		17142	17142
Total	188,562.00	107,451.00	81,111.00	188,562.00
Income item	\$			
Community Assistance Grant - State Gov.	89,542.50			
Community Assistance Grant - Council	17,908.50			
Total	107,451.00	-	-	
Other funding sources	81,111.00			

Loans to Community Groups Policy

Document Name	Document Version Number	Review Date
Loans to Community Groups Policy	1.0.1	June 2018
Date Adopted	Minute Number	Status
22 June 2016	4395	Revised

Purpose

To provide financial assistance to community groups and organisations within the shire by way of interest bearing loans.

Scope

Community groups and organisations within the shire.

Definitions

Nil.

Policy Content

Council will consider providing financial assistance by way of interest bearing loans to community groups and organisations within the Greater Hume Shire Council area for the purposes of exercising Council functions of providing community, sporting, and recreational projects, services and facilities under the following guidelines:

1. The community project or facility which is subject of the application for a loan is approved by Council and is located on Council owned or controlled (usually Crown Land) community land.
2. Applications for loans to purchase major items of plant and equipment will be considered however consideration will only be given to applications where the use of such plant and equipment is directly related to the maintenance and operations of the community facility to which it is assigned. Council's Director Engineering must be advised of the proposed purchase and confirmation as to the suitability of the proposed item of plant and equipment must be obtained from Council prior to a loan being granted under this policy.
3. Applications for loans will be considered up to a maximum of \$50,000, subject to the loan liability to the Council for any one community group not exceeding \$50,000 at any one time.
4. The interest rate for all loans shall be fixed at a rate of 3% per annum for the duration of the loan.
5. The period for repayment of loans will be within a term of not more than 10 years.
6. The quantum of all loans approved shall not exceed \$250,000 at any one time. Should the maximum loan amount be reached applications from community groups and organisations will be considered by Council and placed on a waiting list until sufficient loan funds have been repaid.
7. Priority will be given to applications for financial assistance from community groups and organisations that:
 - a. Provide community, recreational and sporting projects, services and facilities that are available uniformly to all persons or a significant number of persons within the Council area and;

Loans to Community Groups Policy

- b. Include the contribution of funds by the community group or organisation, either cash or in kind.
8. Council will undertake a due diligence review to establish the ability of the applicant to service loan interest and principal repayments.
9. Applications by community groups and organisations for loans from Council must provide a full description of the project, service or facility for which the loan is sought and include with the application the following:
 - a. Annual audited income and expenditure statements for the last 3 years.
 - b. A copy of the community group or organisations constitution (not required if the community group or organisation is a Committee of Council constituted under section 355 of the Local Government Act).
 - c. A copy of the minute passed at a meeting of the community group or organisation seeking the loan from Council.
10. The full amount of any loan provided by Council under this policy must be drawn down in full within two years of being approved.

Links to Policy

Nil.

Links to Procedure

Nil.

Links to Forms

Nil.

References

Nil.

Responsibility

Director Corporate & Community Services

Document Author

Director Corporate & Community Services

Relevant Legislation

Section 356, Local Government Act 1993

Associated Records

Nil.