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Moree Plains Shire Council

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30th October 2024

Attention to : Paul Sio – Land Use Planner

Project : DA2024/50 - Development Application - Erection of a 4.95MW Solar Farm - 408
Burrington Road MOREE - LOT: 1 DP: 606406

Subject : ACENERGY's Response to Received Public Submissions (2 nos)

With reference to the above mentioned project/subject and further to received two submissions/objection letters regarding the 5MW proposed solar farm at the above location. Kindly find below ACENERGY's Response to each submission letter.

Thanks and Regards,

ACENERGY,

ACEnergy's Response to Submission Letter No.1

Enquiry	Subject	ACE's Response	Referenced Document
Point No.1	Agriculture Value	<p>The proposed development site is surrounded by non-agricultural rural uses; most notable the existing Moree solar farm, Moree grain storage facility and the 60-hectare Moree Water Park, as well as rural lifestyle properties to the east. The site is within an area unlikely to see urban development, or meaningful agricultural development pressures. The proposed use of the land for a small-scale solar farm is therefore considered an optimal use of the land.</p> <p>The proposal has been carefully designed to ensure that it will not impede existing agriculture within the surrounding area. The use of the land for a solar facility will be a low impact use and has been carefully sited to avoid any adverse impact upon rural infrastructure.</p> <p>The subject site and the surrounding area are not mapped as BSAL under the Resources and Energy SEPP and are therefore conducive to diversification of rural land uses such as renewable energy facilities and the like. Consequently, the proposed use of the subject site is unlikely to undermine the integrity and viability of the rural economic base.</p> <p>The development would be limited to the land in the south of the landholder's property, leaving the remainder of the farm for ongoing agriculture. Moreover, the development area is able to be used for agricultural activities again in future following decommissioning of the development, the development is considered to have negligible impact on the agricultural production associated with the property.</p>	<p>Kindly refer to: SEE Report (Sections 5.5, 6.5, 7.2.1, 7.2.2)</p>
Point No.2	Ecological	<p>The development has been sited to ensure it would not require removal of established native trees or significant habitat and would provide a regional municipality with access to affordable renewable energy. The proposal has been positioned on a part of the property that is completely devoid of any paddock trees; thus, there will be negligible impact on biodiversity as a result of the proposal or any associated works.</p>	<p>Kindly refer to: SEE Report (Sections 7.3.2, 8.1, 10.3.1)</p> <p>Appendix D – Preliminary Flora and Fauna Report</p>

		<p>A Preliminary Flora and Fauna Assessment was undertaken by Waratah Ecology (Appendix D), which determined that:</p> <p><i>“The proposed solar farm development will not significantly impact native grasslands or any threatened flora or fauna, due to the high level of weed infestation and impact from historical clearing and cattle grazing. Any potential impacts associated with the proposed works can be minimised and mitigated through control measures recommended in Section 5 of Preliminary Flora and Fauna Assessment Report”</i></p>	
Point No.3	Flooding	<p>The proposal avoids any vegetation removal that would unduly impact the surrounding groundwater catchment, and the ongoing use would not lead to any adverse impacts such as salinity, erosion or flood risks.</p> <p>The development comprises largely permeable fencing and ground-mounted installations that would not significantly impede natural flow paths.</p> <p>This application is accompanied by a Flood Risk Assessment by Water Technology (Appendix E), which determined that:</p> <p><i>“There are no significant overland flow paths across the site causing ponding of shallow flood waters (facility location). In the main flow paths, depths were less than 220 mm and maximum velocities less than 0.30 m/s, resulting in the site being classified as flood hazard H1 (generally safe for people, vehicles, and buildings). Based on the findings of the flood modelling, it is recommended to set any solar panels and critical electrical infrastructure at least 300 mm above the ground level”</i></p> <p>Kindly refer to the updated Flood Risk Assessment Report by Water Technology (Ref 23010129_Moree_V02) in which:</p> <ul style="list-style-type: none"> - The typo error in (page 4) Figure 2.1 has been corrected - A new section has been added to the report “Section 2 Previous Flood Studies” which shows the site is located outside of the 1% AEP flood extent. 	<p>Kindly refer to: SEE Report (Sections 5.5, 8.1, 10.2)</p> <p>Updated Flood Risk Assessment Report by Water Technology (Ref 23010129_Moree_V02)</p>
Point No.4	Visual and Glare	<p>The site has been selected through a careful site selection and design process to ensure that views from most public interfaces are largely obscured by existing tree belts and inherent site features.</p>	<p>Kindly refer to: SEE Report (Sections 4.2, 5.2, 5.5, 8.1)</p> <p>Appendix H – Landscape Plan</p>

		<p>The facility will be further screened from view with perimeter landscaping along the site's perimeters which includes a landscaping buffer around the northern, eastern and southern compound perimeter, that will screen the facility from view from nearby roads and adjoining land.</p> <p>In consideration of the nature of the proposed facility and physical separation to any nearby facilities, the development would not lead to any undue cumulative visual impact on the surrounding area as a result of the proposed solar panels.</p>	
Point No.5	Town Water	The development does not have need for a water connection, the water will be supplied as required to the site via water tankers during construction phase for dust and other environmental control measures. Also, Fire Water will be provided via the proposed static water tank.	
Point No.6	Land Value	It is not a planning item related to the development planning. However, given that there are already existing and operated Solar Farm within the vicinity of the proposed development site, the development is considered to have negligible further impact on the land value of nearest properties.	
Point No.7	Storm Periods	The detailed design of the proposed facility will include further studies and assessments such as Geotech soil assessment and wind load and others, which provide inputs to the design safety requirements, that will be reflected in the design and installation details for foundation and infrastructure.	

ACEnergy's Response to Submission Letter No.2

Enquiry	Subject	ACE's Response	Referenced Document
Point No.1	Agriculture Value	<p>The proposed development site is surrounded by non-agricultural rural uses; most notable the existing Moree solar farm, Moree grain storage facility and the 60-hectare Moree Water Park, as well as rural lifestyle properties to the east. The site is within an area unlikely to see urban development, or meaningful agricultural development pressures. The proposed use of the land for a small-scale solar farm is therefore considered an optimal use of the land.</p> <p>The proposal has been carefully designed to ensure that it will not impede existing agriculture within the surrounding area. The use of the land for a solar facility will be a low impact use and has been carefully sited to avoid any adverse impact upon rural infrastructure.</p> <p>The subject site and the surrounding area are not mapped as BSAL under the Resources and Energy SEPP and are therefore conducive to diversification of rural land uses such as renewable energy facilities and the like. Consequently, the proposed use of the subject site is unlikely to undermine the integrity and viability of the rural economic base.</p> <p>The development would be limited to the land in the south of the landholder's property, leaving the remainder of the farm for ongoing agriculture. Moreover, the development area is able to be used for agricultural activities again in future following decommissioning of the development, the development is considered to have negligible impact on the agricultural production associated with the property.</p>	<p>Kindly refer to: SEE Report (Sections 5.5, 6.5, 7.2.1, 7.2.2)</p>
Point No.2	Visual Impact	<p>The site has been selected through a careful site selection and design process to ensure that views from most public interfaces are largely obscured by existing tree belts and inherent site features.</p> <p>The facility will be further screened from view with perimeter landscaping along the site's perimeters which includes a landscaping buffer around the northern, eastern</p>	<p>Kindly refer to: SEE Report (Sections 4.2, 5.2, 5.5, 8.1)</p>

		<p>and southern compound perimeter, that will screen the facility from view from nearby roads and adjoining land.</p> <p>In consideration of the nature of the proposed facility and physical separation to any nearby facilities, the development would not lead to any undue cumulative visual impact on the surrounding area as a result of the proposed solar panels.</p>	
Point No.3	Air Quality and Erosion Control	<p>Indirect impacts such as (air pollution, erosion and sedimentation during and following construction) for the proposed works have been considered in the ecological impact assessment. Impacts are considered to be manageable through the development of a Construction Environmental Management Plan (CEMP) adherence to the dust, erosion and sediment controls measures which are listed in Section 5 in Appendix D.</p> <p>CEMP will be prepared and submitted to Council and concerned Authority for approval prior construction commencement. CEMP should address pollution and contamination issues that could arise during construction. For examples:</p> <ul style="list-style-type: none"> - Silt fences to be put in place around the construction site to limit the spread of sediment and weeds into adjacent vegetation. - Erosion controls (i.e. silt fences etc.) should be inspected regularly (daily during workdays) and after rainfall. Damaged controls should be fixed immediately. - Accumulated sediment or waste material is to be removed from within the sediment controls regularly and disposed of at a licensed waste facility. - The works should be scheduled outside of predicted heavy rain periods. 	Kindly refer to: Appendix D – Preliminary Flora and Fauna Report (Section 5)
Point No.4	Capital Growth	<p>The development would be limited to the land in the south of the landholder's property, leaving the remainder of the farm for ongoing agriculture. Moreover, the development area is able to be used for agricultural activities again in future following decommissioning of the development, the development is considered to have negligible impact on the agricultural production associated with the property.</p> <p>Further to the above, the lease of the development area provides a secondary income to the landowner which will result in positive economic benefits.</p>	

Point no. 5	Insurance	It is not a planning item related to the development planning.	
Point No. a	Town Water usage	The development does not have need for a water connection, the water will be supplied as required to the site via water tankers during construction phase for dust and other environmental control measures. Also, Fire Water will be provided via the proposed static water tank.	
Point No. b	Traffic	<p>The effect of the proposal on the operation of the road and on public safety would be negligible. The Traffic Impact Assessment concludes that the subject site is suitable for the proposed development in relation to the impact of access, traffic impacts and safety considerations.</p> <p>A detailed Construction Traffic Management Plan (CPTMP) will be prepared and submitted to Council and related Authority for approval prior construction commencement.</p>	<p>Kindly refer to: SEE Report (Sections 5.4)</p> <p>Appendix F – Traffic Impact Assessment</p>
Point No. c	Aboriginal Due Diligence Assessment	An AHIMS search was undertaken on 21/02/2024, with a buffer of 1 kilometre. The search concluded that no Aboriginal sites are recorded in or near the proposal area, nor have any Aboriginal places been declared in or near the proposal area.	<p>Kindly refer to: Appendix A – AHIMS Search</p>