



Our ref: 19310.6

23 April 2021

Gunnedah Shire Council  
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**Attention:** Ashleigh Stewart

Dear Ashleigh,

**RE: Response to Further Request for Additional Information – DA-2020/035 – 262 Hunts Road  
Gunnedah NSW 2380**

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Thank you for your letter dated 8 April 2021, which sought additional information regarding the proposed establishment of a solar farm (DA-2020/035) at 262 Hunts Road Gunnedah NSW 2380.

Please find below a response to these matters raised by the Northern Regional Planning Panel, prepared by SLR Consulting Australia Pty Ltd (Formerly KDC Pty Ltd) on behalf of Providence Asset Group (PAG).

**1 RECORD OF BRIEFING**

Key Issues Discussed	Response
+ The Panel was briefed by Wade Hudson, as the assessing officer was not available.	Noted.
+ Wade Hudson declared a possible conflict of interest, being that a friend of his wife has made a submission in relation to the development application. For this reason, despite Wade providing the briefing to the panel on this occasion due to absence of the relevant officer, the assessment itself will be undertaken by another assessing officer, Ashleigh Stewart.	Noted.
+ The status of the application is that council is waiting on response to a request for further information.	It is noted, the applicant provided a response to a request for further information to Gunnedah Shire Council on the 19 <sup>th</sup> of March prior to the Northern Regional Planning Panel Briefing held on the 24 <sup>th</sup> of March. The Applicant understands that Gunnedah Shire Council was satisfied with the response.
+ The development site is in the RU4 zone and the proposed use is permissible.	Noted. The proposed solar PV is considered to meet the objectives of the RU4 Primary Production Small Lots zone and is appropriate for the area.

<p>+ The site is proximal to a number of residences and there is potential for land use conflict particularly with respect to construction noise and visual effects.</p>	<p>Construction noise impacts are temporary and can be minimised through management procedures in line with accepted practice. A Construction Management Plan will be prepared for the proposal.</p> <p>A summary of the construction activities, duration and their expected noise implications has been provided in Table 1. The indicative noise table was also provided as part of the RFI response issued to Gunnedah Shire Council on the 19<sup>th</sup> of March.</p> <p>Substantial landscaping is proposed as part of the development which will complement existing trees both within the site and within the road verge. This arrangement reduces available views into the site, in turn minimising potential land use conflict with neighbouring land uses.</p>
<p>+ The site is reasonably close to residential areas and it is possible that it will be nominate as a future residential area in the current strategic planning review being undertaken by council. The applicant is to investigate this potential longer-term use and report on any land use conflicts that could arise.</p>	<p>At cessation of operation, the solar farm will simply be decommissioned with all equipment removed and with no ongoing environmental impacts burdening any future land use including residential.</p>
<p>+ The development would have a lifespan of 25 years and the likely use over this period should be investigated.</p>	<p>At cessation of operation, the solar farm will be decommissioned with all equipment removed, minimal site rectification works and with no ongoing environmental impacts burdening any future land use including possible expansion of residential land use zones.</p>
<p>+ Appropriate construction stage access needs to be identified.</p>	<p>A Construction Management Plan (CMP) will be in place governing the construction phase of the development. This CMP will include management of the site access during the construction phase. Access to the project will be via the existing Hunts road to the south of the site.</p>
<p>+ Landscaping will be external to the security fence to mitigate visual impacts, but the security of this arrangement needs to be examined to ensure planting would be protected.</p>	<p>Landscaping will be established on the outside of the security fence as agreed with Council and clearly outlined in more detail in the RFI response submitted to Council on 19<sup>th</sup> of March 2021. Detailed landscaping plans to be included as condition of consent prior to construction.</p> <p>Detailed protection measures outside of staking and signage to dissuade vandalism are not considered necessary in this rural setting.</p>
<p>+ The loss of native vegetation and habitats requires careful consideration.</p>	<p>The site has been largely cleared of native vegetation for ongoing agricultural purposes. A total of 9 isolated trees are proposed to be removed as part of the application. A small portion of immature shrubs located within the north eastern portion of the site will also be removed to facilitate the proposed development.</p> <p>To ameliorate the loss of these trees and improve visual impacts, substantial landscaping is proposed along the northern, eastern, and western boundaries. This landscaping will improve the amount of native</p>

	vegetation in the site and provide enhanced wildlife corridors by connecting the existing vegetation community which currently exists only in pockets across the site.
+ Given the potential for significant impacts the applicant needs to demonstrate what practical and effective mitigation measures will be incorporated into the proposal particularly with respect to construction noise, visual impacts, and details of landscaping.	<p>The proposed visual mitigation measures focus on extensive landscaping buffer planting.</p> <p>Based on the recommendations of the VIA and the positioning of the solar farm, a landscape plan was created to mitigate the visual impacts on the surrounding area.</p>
+ The applicant should ensure that all issues raised by submitters are responded to individually.	A total of thirteen (13) submissions were received during the exhibition period for the proposed development. A summary of the items raised was provided within the RFI letter received on the 10 <sup>th</sup> August 2020 with a response to each individual submission provided to Gunnedah Shire Council on the 8 <sup>th</sup> of September 2020.

## 2 REQUEST FOR FURTHER INFORMATION

### 2.1 VISUAL IMPACT

#### Council Comment:

*Artist impressions are required from residential receivers identified in figure 2.3 of the Visual Impact Assessment as being visible or partly visible from that receiver. The artist impression is required to show the level of impact on private receivers, In the event that access to private property cannot be achieved, evidence of a reasonable attempt to secure access must be shown.*

#### Response:

A review of photographs taken on visits to the site and contained within the Visual Impact Assessment (VIA), cross referenced with google street view images indicate that this exercise would result in a series of images of limited use for assessment of the proposal.

Figure 2.3 of the VIA indicates that residential receivers R1, R2 and R3 are the only dwellings from which the subject site will be visible. Photographs 2, 1 and 3 of same report generally align with the dwellings (R1 = photo 2, R2 = photo 1, and R3 = photo 3). Analysis of each residential receiver below indicates that artists impressions would be of little merit in the assessment of impacts, with all identified dwellings either aligned away from, or unable to gain direct views of the proposed solar farm.

#### Residential Receiver 1 – 170 Bushs Lane

The dwelling at 170 Bushs Lane is oriented toward the north east, away from the solar farm installation. Images obtained through realestate.com.au show extensive landscaping and outdoor entertainment areas constructed to the north east of the dwelling, leading from the kitchen/living/dining areas. (image 4 and 5)

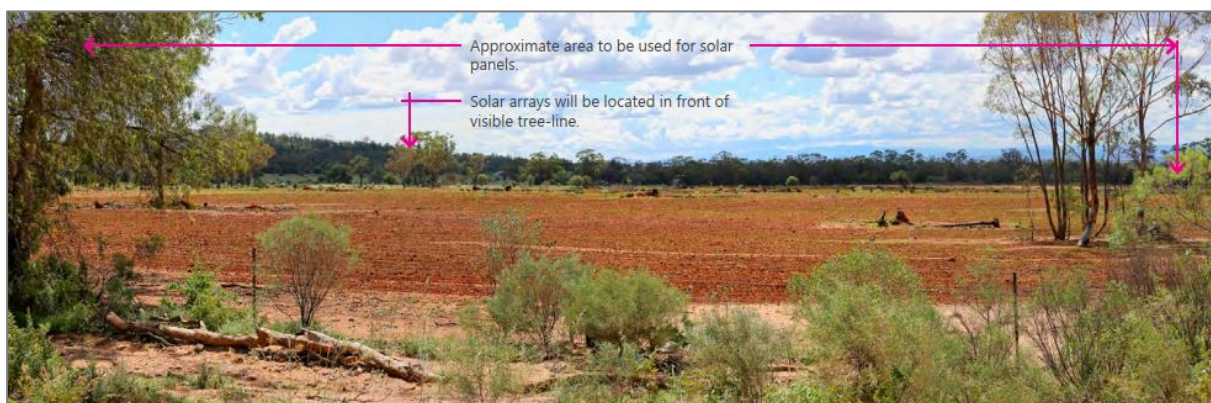
In addition, two sheds have been constructed to the north and west pf the dwelling that, combined with existing vegetation, obscure views further west to and over the proposed solar farm. (see image 3).

It is the opinion of SLR that an artist's impression of the solar farm from this residential receiver is unwarranted due to the existing orientation and the likely views obtained from the useable spaces of the dwelling.

**Image 1 - Aerial image showing R1, and location of photograph 2 (source: Google Maps)**



**Image 2 - Photo 2 (Source: Mara Consulting Visual Impact Assessment)**





**Image 3 - Aerial image showing R1 in detail, with entertainment and outdoor areas facing north east, away from the proposed solar farm (source: Google Maps)**



**Image 4 - R1 entertainment areas to north east of dwelling (source: realestate.com.au)**



**Image 5 - R1 entertainment areas to north east of dwelling (source: realestate.com.au)**



Residential Receiver 2 – Lot 3 DP1214749

The dwelling on Lot 3 DP 1214749 at the southern end of Black Jack road is oriented to the north east, and is located west of a stand of dense vegetation, shielding the proposed solar farm from view. (Image 6 and 7)

Aerial images show numerous substantial trees on the land between the dwelling and Black Jack Road, and google street view shows dense mid story vegetation that prevents views either from the road to the dwelling, and hence it is expect that this will also prevent views from the dwelling to the road and beyond to the solar farm. (Image 8)

It is the opinion of SLR that an artist's impression of the solar farm from this residential receiver is unwarranted due to the existing vegetation on the site.



**Image 6 - Aerial image showing R2, and location of photograph 1. Note existing tree stands between R2 and proposed solar farm (source: Google Maps)**



**Image 7 - Photo 1 (Source: Mara Consulting Visual Impact Assessment)**



**Image 8 – Street view from Black Jack Road toward R2 (source: Google Street View)**



**Residential Receiver 3 – 530 Black Jack Road**

The dwelling at 530 Black Jack Road is oriented toward the north east, generally away from the solar farm installation (Image 11). Images obtained through realestate.com.au show covered entertainment areas constructed to the north east of the dwelling, leading from the kitchen/living/dining areas. (image 12 and 13).

It is the opinion of SLR that an artist's impression of the solar farm from this residential receiver is unwarranted due to the existing orientation and the likely views obtained from high use areas of the dwelling. The solar farm, whilst visible, is behind key view lines from the dwelling.

**Image 9 - Aerial image showing R3, and location of photograph 3. Note existing tree stands between R2 and proposed solar farm (source: Google Maps)**





**Image 10 - Photo 3 (Source: Mara Consulting Visual Impact Assessment)**



**Image 11 - Aerial image showing R3, and location of photograph 3. Note existing tree stands between R2 and proposed solar farm (source: Google Maps)**



**Image 12 - R3 entertainment areas to north east of dwelling (source: realestate.com.au)**



**Image 13 - R3 living/dining room opening to the north east of dwelling (source: realestate.com.au)**



**Council Comment:**

*A detailed Landscape Plan is required which illustrates the following:*

- *Symbol for the species type of each tree and shrub proposed is to be included in the Planting Legend and location of each plant shown on plan.*
- *Planting Schedule is to include staking and quantity of each plant.*
- *A Plant Setout Detail is required to illustrate plant distance from boundary fence and other proposed plantings and also include a planting and staking method.*
- *Landscaping is to be positioned on the exterior of the site security fence for visual screening of security fence as previously discussed.*
- *Landscaping is to be provided along the entire frontage to Bushes Lane. The panel considers the vegetation in the road corridor to be an added bonus to the developer only and should not be relied upon for visual screening.*

**Response:**

During the meeting held between Providence Asset Group (the Applicant), SLR (Town Planner representing the Applicant) and Gunnedah Shire Council (Andrew Johns, Wade Hudson, Ashley Stewart) on the 18<sup>th</sup> March 2021, the Applicant committed to providing additional guidance and confirmation on the proposed landscaping and vegetative screening barriers for the purposes of a conditioned consent.

The Applicant accepts a condition of consent to be applied outlining the requirement for landscaping to be established and maintained for the lifespan of the asset that adequately screens the site from external receivers. A detailed landscaping plan will be provided to Council prior to issue of the Construction Certificate. The landscaping plan will consist of a mixture of hardy local native species of variable heights planted in staggered rows so as to provide an increased level of coverage. A 10 m buffer zone will be established between the lot boundary and the site security fence within which landscaping will be established and maintained. The buffer zone will also allow landholder and operational access around the full perimeter of the site.

The detailed landscaping and vegetation management plan will include requirements for maintenance including watering. In the event particular plantings do not survive, the vegetation management plan will outline the requirements for plant replacements with consideration given to the actual performance of the screening.

Finally, although Bushes Lane currently features large growth vegetation that provides a screening barrier for the development from southern viewpoints, the Applicant will also establish informal additional vegetation screening to complement existing vegetation along Bushes Lane. These plantings will be located within the 10 m buffer zone external to the site security fence.

**Council Comment:**

*Address how landscaping will be protected and preserved from vandalism.*

**Response:**

Security cameras will be installed to monitor possible vandalism and unauthorised entrants on the site.



## 2.2 CONSTRUCTION NOISE

### Council Comment:

*Address how the use of recommended construction noise mitigation measures will satisfy the NSW Environment Protection Authority (EPA's), Noise Policy for Industry, 2017 to reduce emissions to the surrounding community. Including full extent of reduction in decibels (dBA) expected to be achieved by each mitigation measure.*

### Response:

The Applicant recognises the number of concerns and objections to the project related to potential noise impacts both during construction and operation. While the detailed Noise Assessment report established that operational noise is not expected to exceed the more stringent (lower) requirements of the Intrusiveness Noise Level or the Amenity Noise Level as per the NSW EPA Noise Policy for Industry 2017, the Applicant acknowledges that the certain elements of the required construction activities are expected to exceed the guidelines of the EPA.

Due to the nature of certain required construction activities, no viable solution is available to reduce these specific noise impacts below the EPA guidelines. It is noted while the construction of the solar farm is expected to occur over a period of approximately 6 months, piling activities, which represent the largest noise impacts, are expected to be of a significantly shorter duration. To provide greater context to enable Council's assessment of the project, a summary of the construction activities, duration and their expected noise implications is provided in Table 1.

Construction noise impacts are temporary and will be minimised through management procedures. It is noted the work has the potential to cause disruption to surrounding residential premises during the day therefore the following feasible and reasonable mitigation considerations outlined within the NSW EPA Guidelines will be used to manage these impacts. Mitigation measures like the following are likely to be implemented:

- Using alternative, quieter work methods to reduce the noise at the source;
- Scheduling the noisy work during recommended standard hours;
- Restricting work to defined hours and using respite periods, for example working during defined periods outside business hours and providing respite to residents, subject to negotiation (for example periods of 'quiet' or no work and respite offers, such as movie tickets);
- Temporary relocation of residents to allow a concentrated period of noisy works.

Confirmation of specific measures can be provided prior to the release of a construction certificate.

In addition to the available mitigation strategies outlined in the project specific Noise Assessment report and reiterated in the Statement of Environmental Effects, construction hoarding is proposed to be established between the designated loading/unloading areas and the receivers of greatest impact, given the higher volume of work traffic in this area.

**Table 1 – Indicative breakdown of construction activities and relative noise impact**

Item	Activity	Indicative duration	Noise impact
<b>Site clearing and civil works</b>	Use of mechanical digger to dress any required project layout areas, prepare hardstand areas, foundations and access roads. Minimal site dressing is expected to be required. Pouring of concrete foundations for inverter, transformer and switchgear.	Approximately 10 days.	Low – noise levels will be mainly diesel engine noise from a tracked digger, similar to a tractor working the land.  Installation of access roads may require some rolling, as per normal early stage road construction.
<b>Site deliveries</b>	Deliveries from heavy goods vehicles.	Early construction stages, to be undertaken	Moderate – noise levels will be mainly diesel engine noise from

		in accordance with the approved Traffic Management Plan	trucks, forklifts etc. as well as some mechanical noise from setting down equipment in the site compound.
<b>Piling</b>	Mechanical ramming of steel piles into the ground. Expected to be approximately 2,200 piles overall.	22 days at a very conservative rate of 100 piles/day installed.	High - Piling noise is reasonable significant and on calm days with little to no wind, a repetitive metallic "tinking" noise will be heard outside the boundaries of the site while piling works are ongoing.
<b>Trenching</b>	Mechanical digging of trenches for underground cable runs.	~5 days. Trenching requirements of a 6MW solar farm are insignificant and with pre-planning it is expected that these would undertaken in a short time.	Low – noise levels will be mainly diesel engine noise from a tracked digger, similar to a tractor working the land.
<b>Mechanical installation</b>	Distribution of equipment (trackers, modules, electrical equipment) throughout the site. Manual mechanical installation of equipment.	30 days	Low – mainly vehicle movements around site, as well as construction workers conversing and minor mechanical noise as components are placed / bolted in place.
<b>Electrical installation</b>	Distribution of equipment (switchboards, inverter and transformer station, cabling).	30 days	Negligible – mainly vehicle movements around site, with 1-2 large crane movements to install inverter, transformer and switchgear stations, as well as construction workers conversing.
<b>Commissioning</b>	Electrical testing works. Energising the solar farm.	15 days	Negligible – Commissioning will be undertaken by a small number of highly skilled staff. Some

## 2.3 TRAFFIC

### Council Comment:

*Address how traffic generated from the construction of the solar farm will impact on the school bus route in the area.*

### Response:

The construction traffic impacts have been assessed as part of the provided Traffic Impact Assessment (TIA) at Appendix D of the SEE. The TIA projected an average of 10 light vehicles per day of which will arrive between 6am and 7am then departing the site between 5pm and 6pm. Heavy vehicles are projected to be 5 per day spread out between 10 am and 4pm. Construction traffic is not expected to impact the school bus route and will be appropriately managed in the detailed project traffic management plan to ensure conflict avoidance.

### 3 CONCLUSION

The proposed establishment of a Solar PV Farm at 262 Hunts Road, Gunnedah will provide a desirable rural compatible use desired by the Gunnedah community. It will support the region assisting to meet the energy needs of the Gunnedah region in a cost effective and environmentally friendly way.

We trust that the information provided is sufficient, however, if any clarification is needed or you require further information, please contact our office.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rachel Pettitt', enclosed within a light gray rectangular border.

Rachel Pettitt  
**Town Planner**  
**SLR Consulting**