

13 November 2018

Office of the Coordinator-General
Level 17, 1 William Street
Brisbane QLD 4000

Dear David Stolz

AP2018/002 Response to Coordination-General request for additional information - Aldoga Solar Farm

Further to your request for additional information dated 2 November 2018, please find attached the applicant's full response to the information request.

Table 1 outlines relevant information attached in support of the information response.

Table 1 Supporting attachments

| Item | Details |
|---------------------|--------------------------------------|
| Attachment 1 | Updated development plans |
| Attachment 2 | Indicative solar panel cross section |
| Attachment 3 | Ecological Assessment Report |

Scope of proposed development

1.0 Staging

The 'Planning Report – Aldoga Solar Farm', prepared by Aecom, dated 4 October 2018 (planning report), states construction of the development may be staged. Further clarification is required on whether development is proposed to be constructed in one comprehensive stage or developed in separate stages.

The proponent is requested to clarify whether the development is proposed to be staged. If the development is to be staged, update the application material and plans of development to reflect this.

Response

As per pre-lodgement discussions, ACCIONA Energy intends to develop the full project in one stage only; however is seeking flexibility within the approval to allow for a two-stage development in the unlikely scenario that a staged approach to construction would occur. The Staging Plan provided as part of the Development Plans demonstrated a potential staging scenario; however the MCU application material includes assessment of a maximum-impact scenario (construction of the full project in one stage).

ACCIONA Energy is familiar with approval conditions for solar farms elsewhere in Australia that provide for some flexibility regarding staging - subject to the preparation and provision of stage-specific plans and documentation for the regulator's reference. Example of these conditions have been provided to the Office of the Coordinator-General (OCG) and ACCIONA Energy requests that the OCG considers incorporating flexibility within any approval conditions in a similar manner.

2.0 Waste fuel or oil

Table 4 Page 31 of the planning report states "no waste fuel or oil to be stored on site (not to exceed 100L in total at any one time)". This statement appears to contradict itself.

The proponent is requested to provide details of any waste fuel or oil to be stored on site, including likely quantities, and the component of the development is required for.

Response

Please refer to the following amended wording to replace the existing wording within the Planning Report:

No significant waste fuel or oil to be stored on site (will not exceed 100L in total at any one time).

The waste fuel or oil would be from construction equipment and would be contained within the site compound area during construction activities.

3.0 Refuelling and concrete wash down area

Page 32 of the planning report indicates an area may be required for a refuelling area and concrete wash down area.

The proponent is requested to show this location on a site plan and provide details of the proposed refuelling and concrete wash down area and demonstrate how any release of water, including grease, oil or litter, will be captured and appropriately treated and disposed of to not unduly impact on surrounding and onsite waterways and the surrounding local environment.

Response

The location of the proposed refuelling area has been shown on the updated development plan (**Attachment 1**).

A refuelling area within the site compound will be appropriately bunded and managed in accordance with relevant Australian and Queensland standards. No fuels, oils, lubricants or other contaminants will be directly or indirectly released to any watercourse, waterway, groundwater, wetland or lake.

In the event that a concrete wash-down is required, it will be located within the site compound. The wash down would be self-contained and lined in an impermeable layer such as concrete.

Visual Impact

4.0 Visual impact assessment report

The proponent is requested to provide:

confirmation that the visual assessment report has taken into consideration the location of houses along Flynn Road located near the proposed operational access point (C) on the submitted drawings and provide an assessment if necessary.

a visual photomontage for the entire site from various vantage points similar to Figure 19 in the visual assessment report.

Response

The Landscape and Visual Impact Assessment Consultant (Lat27) has provided a written response to the information requested as provided in Table 2 below.

Table 2 Landscape and Visual Impact Assessment Response

| Request | Response |
|---|---|
| <p>The proponent is requested to provide:</p> <ul style="list-style-type: none"> confirmation that the visual assessment report has taken into consideration the location of houses along Flynn Road located near the proposed operational access point (C) on the submitted drawings and | <p>The visual assessment did consider the potential for impact on properties located on Flynn Road. However, this was not specifically discussed in the visual impact assessment report for the following reasons:</p> <ul style="list-style-type: none"> There are very few properties located off Flynn Road. The closest property accessed off Flynn Road is around 5km from the Site, a distance at which significant impacts due to a solar farm are unlikely unless from an elevated location. The properties off Flynn Road are typically at between 60 and 70 m AHD and are separated from the Site by |

| Request | Response |
|---|--|
| <p>provide an assessment if necessary.</p> | <p>intervening landform associated with the forested foothills of the Mount Larcom Range. The properties are therefore not elevated locations and will not experience significant impacts.</p> <ul style="list-style-type: none"> • Moreover, all of the properties are located in wooded areas where views are curtailed/buffered by surrounding natural and garden vegetation. • As these are private properties, none of these residences were accessible for the purposes of undertaking viewpoint assessment. • On this basis, the main impact of the project would be associated with potential views of the traffic movements of staff accessing the site along Flynn Road during the operational phase of the project. The advice is that this would comprise 10 round trip vehicle movements per day between the site and Gladstone, with these trips being spread across both the proposed operational phase site accesses (via Flynn Road and The Narrows Road) and made in either light truck or 4WD vehicles. • Even if all traffic movements were via Flynn Road, the visual impact of up to 20 vehicles passing a private driveway each day would not be considered a significant impact. |
| <ul style="list-style-type: none"> • a visual photomontage for the entire site from various vantage points similar to Figure 19 in the visual assessment report. | <ul style="list-style-type: none"> • As shown at Table 22 of the assessment, no significant visual impacts were identified from any of the viewpoints assessed. Therefore, visualisations to communicate the visual impacts of the scheme are considered to be unnecessary. • However, to provide some indication of the visual effect of the scheme, Visualisation 1 (Figure 19) from Viewpoint 7 was selected as it represents the 'worst-case' visual impact with elevated views over the majority of the solar farm site. • The two cross sections (Figure 17 and 18) were also prepared to support the assessment that visual impacts of the project are contained due to the presence of landform and intervening vegetation. • As noted in the assessment, most views towards the Site are experienced by very few receptors. • Even if visualisations were to be created, from most of the viewpoints the panels would be barely/not perceptible. The main ground-level viewpoint where the solar farm would be partially visible is Viewpoint 8, but this has negligible sensitivity as is not typically accessible to the public. • Compared to other types of development that may be permissible within the GSDA which are likely to have higher components the majority of the solar farm infrastructure falls below the surrounding tree line. |

Traffic

5.0 Construction operating hours

The traffic report states proposed construction hours will be 6:30am to 6:30pm Monday to Saturday. The planning report states construction hours will be 'standard hours'.

The proponent is requested to confirm construction operating hours are 6:30am to 6:30pm Monday to Saturday, consistent with the details in the traffic report.

Response

ACCIONA Energy has confirmed that the hours of construction will be 6:30am to 6:30pm Monday to Saturday as per the details in the traffic report.

Infrequently, there may be a need to have some quiet works undertaken outside these standard hours; however the Project's Construction Environmental Management Plan will outline the procedure for planning such activities (e.g. notifying Gladstone Regional Council and nearby residents, etc.) prior to them taking place.

6.0 Bus Transport

The proponent is requested to confirm whether construction staff will be employed for multiple shifts in a single day and if so, provide information on how traffic generated at shift transition peak times will be dealt with (with all staff from the new shift arriving and all staff from finishing shift departing)

Response

ACCIONA Energy has confirmed that there will not be multiple shifts in a single day during construction.

Gladstone SDA Development Scheme

7.0 Strategic vision

The proponent is requested to provide an assessment of the proposal against the Strategic Vision of the Gladstone SDA development scheme.

Response

The strategic vision of the Gladstone State Development Area Development Scheme 2015 is:

- (a) to be the preferred location for the establishment of industrial development of regional, state and national significance and supporting infrastructure*
- (b) to be a location for supporting industries which facilitate industrial development of regional, state and national significance*
- (c) to have a coordinated approach and maximise the safe and efficient use of existing and future linear infrastructure to industries and the port*
- (d) to contribute to maintaining the outstanding universal value of the Great Barrier Reef World Heritage Area and*
- (e) for development to occur in a logical sequence recognising the short and long term economic benefits to the region and state.*

The Strategic vision is also "supported by the overall objectives for development and preferred development intents of development precincts within the Gladstone SDA".

The Project is a direct initiative of the State Government, through the realisation of one of the key elements of EDQ's *Advancing our Cities and Regions Strategy* to repurpose underutilised State-owned land that has been vacant for a substantial period of time. Economic Development Queensland has identified this project as a strategically important interim use within the GSDA as it is unlikely that the land would otherwise be developed for industrial development within the next 30 years.

The proposed solar farm will not compromise the development of surrounding SDA land for industrial purposes or high pressure gas pipelines and will provide significant economic benefits to the region through employment and efficient power generation. A priority outcome for electricity infrastructure for the Region (as articulated in the Central Queensland Regional Plan) is to increase the generation of energy through both public and private sector investment. Investments are encouraged to focus on reinforcing electricity generation and transmission / distribution systems where and when they are needed in response to forecast growth with consideration of energy efficiency efforts.

The Project will not affect the outstanding universal value of the Great Barrier Reef World Heritage Area (GBRWHA) by promoting a clean energy source with no direct impact from emissions on the GBRWHA.

8.0 High Impact Industry Precinct and Medium-High Impact Industry Precinct

It is acknowledged the proposed use is in the High Impact Industry, Medium-High Impact Industry and Materials Transportation and Services Corridor Precinct of the Gladstone SDA.

The proposed use is considered to align with the definition of a “Renewable energy facility” and “substation” in the development scheme. These uses are not listed as defined uses generally considered to meet the precinct intent of the High Impact Industry and Medium-High Impact Industry Precinct of the Gladstone SDA development scheme.

The planning report states the development is considered to meet the precinct intent, inter alia, on the following basis:

- *solar farms require large areas of relatively flat land for efficient power generation; and*
- *solar farms are preferably separated from sensitive receptors etc.*

Appendix D also provides a response to the preferred development intent of the precincts.

The proponent is requested to provide additional reasoning to demonstrate how the proposal satisfies the preferred development intents of both the Medium-High Impact Industry and High Impact Industry precincts.

Response

As per the preferred development intent of the GSDA Development Scheme for both the Medium – High Impact Industry Precinct and High Impact Industry Precinct, ‘*other uses may also be supported where these require co-location with and do not compromise the uses generally considered to meet the precinct intent*’. The key driver for the Project is the co- location with existing electrical infrastructure, including high voltage powerlines and a substation. Co-location with this infrastructure is essential to the development of a solar farm to enable efficient and cost effective access to the National Energy Market.

It is reinforced that the proposed renewable energy facility use will not compromise the existing, proposed or approved future land uses within the Gladstone State Development Area. The Project is able to coexist with high impact industries (i.e. Steel making facility and rail corridor) without impacting the operational integrity of the facility.

Solar farms allow a flexible development footprint, which can mould to otherwise less desirable land patterns and arrangements. The solar farm can be developed to utilise land which would otherwise have limited development capacity for typical industrial activities. The Project includes setbacks to watercourses, proposed rail infrastructure, electrical easements, and existing approval uses, whilst still creating an effective use of the remaining land on the site.

Ecological Assessment Report

9.0 Typographical errors

Various pages throughout the report titled 'Ecology Assessment Report', prepared by GHD and dated September 2018, have typographical errors in the heading titles (e.g. Executive Summary paragraph 2 and 3 on page ii).

The proponent is requested to resubmit a corrected report.

Response

An amended Ecological Assessment Report is contained in **Attachment 3**.

Mapping and plans

10.0 Car parking and access

The submitted documentation states car parking will be required on site for staff during construction and operation, however these are not shown on a plan.

The proponent is requested to provide an updated site plan showing:

- *adequate car parks and turnaround areas for both the construction and operational stages of the development, and*
- *the location of the bus transport set-down point and adequate turnaround areas.*

Response

An updated development plan has been provided as **Attachment 1** showing adequate car parks and turnaround areas for both the construction and operational stages of the development and the location of the bus transport set-down point with adequate turnaround areas.

11.0 Buildings

While it is acknowledged the site plan shows an indicative location for the building and substation, no further details or concept plans about the building have been provided in the planning report or Appendix C development plans.

The proponent is requested to provide elevation drawings for all proposed buildings on site.

Response

Elevation drawings have been provided as part of **Attachment 1** for all proposed operational buildings on site.

12.0 Solar panels

There is some information in the supporting visual assessment report indicating what other solar panels might look like, however there are no drawings in Appendix C development plans for the solar panels.

The proponent is requested to provide a plan showing a proposed solar panel cross-section.

It is noted that some of this information is in the landscaped and visual assessment report in an indicative nature. Consider including this in the planning report and as part of the submitted drawings for the proposal.

Response

Please refer to **Attachment 2** for an indicative solar panel and tracking system cross-section (courtesy of NEXTracker). This is typical of the single-axis tracking technology that is proposed for this project. The dimensions described in section 3.2 of the Planning Report (i.e. maximum of 4m above ground) are to be considered in the context of this cross-section. A maximum height of 4m at the top of the solar panel would result in a corresponding increase in the height of the support beam above ground (i.e. an increase of 1.92m from that shown within the cross-section). This allows for flexibility to select a solar panel option that at the point of detailed design to ensure the cost of energy is as low as possible.

Summary

We trust that this letter and the information attached satisfactorily addresses the matter raised by the Coordinator-General in the information request letter and enables the application to be progressed to the referral stage of the application process.

Should you have any queries regarding the responses to matters raised in the information request, please do not hesitate to contact me directly.

Kind regards

A handwritten signature in blue ink, appearing to read 'Cliff Schmidt', with a stylized flourish at the end.

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Attachment 1 - Updated development plans

Attachment 2 - Indicative solar panel cross section

Attachment 3 - Ecological Assessment Report