

From: [Sarah Hillis](#)
To: [ROG South East Region Mailbox](#); [Louis Cameron](#)
Cc: [Kyle Mercer](#)
Subject: RE: Blind Creek Solar Farm RTS - BMP and BDAR for comment
Date: Tuesday, 27 September 2022 3:31:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Draft BMP BCSF BCD Comments NGH Response 20220926 MP.docx](#)
[image009.png](#)

Good afternoon Allison and Louis

Please see attached the NGH response to your review, and a link to the final BMP (will remove the watermarks for final lodgement). We are hoping for lodgement this week.

I hope this sufficiently covers your comment and concern, and we look forward to hearing your comment through the RTS process.

Kindest regards,

Sarah

 [22-319 Blind Creek SF BMP Final 1.0.pdf](#)

SARAH HILLIS
PRINCIPAL CONSULTANT/REGIONAL
MANAGER – PLANNING
BEnvSc, MEnvMgt

Please note I do not work Mondays

T. 02 6923 1562 **M.** 0413 343 912
E. sarah.h@nghconsulting.com.au
35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

QLD · NSW · ACT · VIC
WWW.NGHCONSULTING.COM.AU



NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

From: Allison Treweek <Allison.Treweek@environment.nsw.gov.au> **On Behalf Of** ROG South East Region Mailbox

Sent: Friday, 9 September 2022 3:16 PM

To: Sarah Hillis <sarah.h@nghconsulting.com.au>; Louis Cameron <louis.cameron@environment.nsw.gov.au>

Cc: Kyle Mercer <kyle.m@nghconsulting.com.au>

Subject: RE: Blind Creek Solar Farm RTS - BMP and BDAR for comment

Hello Sarah, we have completed our preliminary review of the BMP. I have attached the comments we have on the draft you provided. Please ensure that our comments are included in

the final version of the BMP that is submitted as part of the RTS process.

Thanks Allison

Allison Treweek

Senior Team Leader Planning

My office is on Ngunnawal Country

Biodiversity and Conservation | Department of Planning and Environment

T 02 62297082 | **M** 0400706004 | **E** allison.treweek@environment.nsw.gov.au

Level 3, Farrer Place, Queanbeyan NSW 2620

www.dpie.nsw.gov.au

In order to ensure a high level of customer service and monitor work flow, South East Planning Team has an email address: rog.southeast@environment.nsw.gov.au. Please address all further email correspondence in relation to Planning matters to this address. If appropriate, emails can be marked to the attention of your usual contact in the team.

The Department of Planning, and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From: Sarah Hillis <sarah.h@nghconsulting.com.au>

Sent: Friday, 9 September 2022 2:28 PM

To: ROG South East Region Mailbox <rog.southeast@environment.nsw.gov.au>; Louis Cameron <louis.cameron@environment.nsw.gov.au>

Cc: ROG South East Region Mailbox <rog.southeast@environment.nsw.gov.au>; Mal Barnes <Mallory.Barnes@environment.nsw.gov.au>; Kyle Mercer <kyle.m@nghconsulting.com.au>

Subject: RE: Blind Creek Solar Farm RTS - BMP and BDAR for comment

Good afternoon Allison and Louis

Just wondering if you had any comments for us yet on the BMP for Blind Creek?

Thanks

SARAH HILLIS
PRINCIPAL CONSULTANT/REGIONAL
MANAGER – PLANNING
BEnvSc, MEnvMgt

Please note I do not work Mondays

T. 02 6923 1562 **M.** 0413 343 912
E. sarah.h@nghconsulting.com.au
35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

QLD · NSW · ACT · VIC
WWW.NGHCONSULTING.COM.AU



NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

From: Sarah Hillis <sarah.h@nghconsulting.com.au>
Sent: Thursday, 1 September 2022 3:41 PM
To: ROG South East Region Mailbox <rog.southeast@environment.nsw.gov.au>; Louis Cameron <louis.cameron@environment.nsw.gov.au>
Cc: ROG South East Region Mailbox <rog.southeast@environment.nsw.gov.au>; Mal Barnes <Mallory.Barnes@environment.nsw.gov.au>; Kyle Mercer <kyle.m@nghconsulting.com.au>
Subject: Re: Blind Creek Solar Farm RTS - BMP and BDAR for comment

Hi Allison

Yes, we were seeking comment prior to lodgement. In particular for the management of the WFC (as per the submission recommendations).

The rest will probably come out in the wash post approvals, when we have an actual condition of consent.

If we could just have comment on the measures around the WFC that would be perfect?

Saraj

Get [Outlook for Android](#)

From: Allison Treweek <Allison.Treweek@environment.nsw.gov.au> on behalf of ROG South East Region Mailbox <rog.southeast@environment.nsw.gov.au>
Sent: Thursday, September 1, 2022 3:36:15 PM
To: Sarah Hillis <sarah.h@nghconsulting.com.au>; Louis Cameron <louis.cameron@environment.nsw.gov.au>
Cc: ROG South East Region Mailbox <rog.southeast@environment.nsw.gov.au>; Mal Barnes <Mallory.Barnes@environment.nsw.gov.au>; Kyle Mercer <kyle.m@nghconsulting.com.au>
Subject: RE: Blind Creek Solar Farm RTS - BMP and BDAR for comment

Hello Sarah, Louis is still working through the BMP. Can you clarify for me that you are seeking comments from us prior to the submission of the RTS? We normally have a 2 week turn around time on our advice. If this is going to hold up the submission of the RTS we can hold our comments till the RTS stage and comment formally. We will be required to formally comment on the RTS so we may be duplicating our effort. It would also be beneficial if there were specific areas you were seeking our comment on?

Thanks Allison

Allison Treweek

Senior Team Leader Planning

My office is on Ngunnawal Country

Biodiversity and Conservation | Department of Planning and Environment

T 02 62297082 | M 0400706004 | E allison.treweek@environment.nsw.gov.au

Level 3, Farrer Place, Queanbeyan NSW 2620

www.dpie.nsw.gov.au

In order to ensure a high level of customer service and monitor work flow, South East Planning

Team has an email address: rog.southeast@environment.nsw.gov.au. Please address all further email correspondence in relation to Planning matters to this address. If appropriate, emails can be marked to the attention of your usual contact in the team.

The Department of Planning, and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From: Sarah Hillis <sarah.h@nghconsulting.com.au>
Sent: Thursday, 1 September 2022 8:23 AM
To: Louis Cameron <louis.cameron@environment.nsw.gov.au>
Cc: ROG South East Region Mailbox <rog.southeast@environment.nsw.gov.au>; Mal Barnes <Mallory.Barnes@environment.nsw.gov.au>; Kyle Mercer <kyle.m@nghconsulting.com.au>
Subject: RE: Blind Creek Solar Farm RTS - BMP and BDAR for comment

Good morning Louis

There has been some minor changes to the BMP on the Client's request. Please see link below for the latest version.

I have left everything in track changes for your information.

Can you please let me know when you will have the opportunity to provide comment?

I will be away from my desk on Friday, but have CC'ed my colleague Kyle into this response. If your reply comes on Friday, can you please make sure you CC Kyle?

Thank you!

Sarah

 [22-319 Blind Creek SF RTS](#)

SARAH HILLIS
PRINCIPAL CONSULTANT/REGIONAL
MANAGER – PLANNING
BEnvSc, MEnvMgt

Please note I do not work Mondays

T. 02 6923 1562 **M.** 0413 343 912
E. sarah.h@nghconsulting.com.au
35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

QLD · NSW · ACT · VIC
WWW.NGHCONSULTING.COM.AU



NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

From: Sarah Hillis

Sent: Tuesday, 30 August 2022 10:20 AM

To: louis.cameron@environment.nsw.gov.au

Cc: ROG South East Region Mailbox <rog.southeast@environment.nsw.gov.au>; Mallory Barnes <Mallory.Barnes@environment.nsw.gov.au>

Subject: Blind Creek Solar Farm RTS - BMP and BDAR for comment

Importance: High

Good morning Louis

I am sorry for the delay in the draft BMP and BDAR for Blind Creek Solar Farm.

Please see links to both the reports below. The BDAR has been left in track changes for your information and ease of comparison/review against the version submitted with the EIS.

The Applicant is still hoping for lodgement this week. As such, we are hoping you could provide a timely response.

Please feel free to give me a call at any stage to discuss.

Kindest regards,

Sarah

 [22-319 Blind Creek SF BMP_Draft_20220823.docx](#)

 [22-319 Blind Creek Solar Farm BDAR Final V2.0 20220822.docx](#)

SARAH HILLIS
PRINCIPAL CONSULTANT/REGIONAL
MANAGER – PLANNING
BEnvSc, MEnvMgt

Please note I do not work Mondays

T. 02 6923 1562 **M.** 0413 343 912
E. sarah.h@nghconsulting.com.au
35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

QLD · NSW · ACT · VIC
WWW.NGHCONSULTING.COM.AU



NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it

immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment, Energy and Science.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment, Energy and Science.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

Biodiversity and Conservation

Blind Creek Solar Farm

Biodiversity Management Plan August 2022 (BMP) Preliminary Comments

The BMP in its current form is considered to inadequately address several aspects of White-fronted Chat (WFC) management and habitat protection, including:

- Being clear and concise for use as an operational document
- Pest animal control
- Consistent and uncontradictory description of weed monitoring and management procedure across the document

General Key Issues:

- ***Use of non-binding terminology***

The plan contains a number of terms such as “used as a basis, should, may include & to be followed”. This terminology does not provide confidence that the actions and recommendations of the plan will be implemented. Replacing this terminology with unequivocal terms is recommended to ensure implementation of the plan’s required actions, especially regarding the WFC.

- ***Inconsistency between main body and sections concerning the WFC***

Sections concerning the WFC need to be consistent and clearly linked with the remainder of the BMP. Details of monitoring programs are inconsistent and often contradictory. Clarity and consistency between each section is needed in order for the BMP to work as an effective operational document.

White-fronted Chat BMP Suggested Actions:

ID	BMP is suggested to:	Comment	NGH Comments
1.	Be easy for operational staff to use and provide a clear, concise, and auditable environmental management framework.	<p>See above comments.</p> <p>Each performance criteria for the WFC listed in Table 7.1 (now table 7.2) do not have a corresponding set of triggers, proposed actions, monitoring programs or reporting requirements attached in the table. These corresponding actions are only partially addressed.</p>	<p>Table 7.2 added.</p> <p>The WFC performance criteria has been updated to include:</p> <ul style="list-style-type: none"> • Monitoring Programs • Improving conditions based on triggers • Management actions
2.	Identify the threats known to affect the viability of WFC. At a minimum, include known threats listed in the threatened species profile in the Threatened Biodiversity Data Collection (TBDC).	Identified in Section 4.1.3.	Section 4.1.3 updated. No information in the TBDC re threats to WFC, however NSW scientific determination has been referenced regarding WFC threats
3.	<p>Detail management actions that would be applied to management zones to address threats. Identify the management zones on a site map. Identify and map any management zones which require different management actions. Suggested management actions include:</p> <ul style="list-style-type: none"> • Establishing dense plantings of indigenous species that support WFC breeding such as <i>Poa labillardieri</i>, prickly <i>Acacia</i> species such as <i>Acacia paradoxa</i>, <i>Bursaria spinosa</i>, <i>Leptospermum</i> and <i>Chenopodiaceae spp.</i> 	Detailed in 7.12.2 and Appendix K.	<p>Section 7.12.2 and Appendix K. updated with native species that occur in the area.</p> <p>Note: <i>Chenopodiaceae</i> species have not been recommended for planting as these species do not typically grow in the habitat identified within the development site.</p>

4.	<ul style="list-style-type: none"> Fencing revegetated areas and installation of tree guards around each plant to prevent trampling and grazing by domestic livestock and overabundant native macropods. 	<p>Non-binding terminology is used in Section 7.11.3 and 7.12.3 when describing planned use of stock-proof fencing. In order to provide confidence in the implementation of this measure, it must be clearly stated that if stock are to be on site during site operation, stock-proof fencing will be installed.</p> <p>Plans to install tree guards around plantings are mentioned only in the appendices of the document. Clear statement of this action in the main body of the BMP is recommended.</p>	<p>Section 7.11.3 and 7.12.3 have been updated include additional wording for stock exclusion fencing and tree guards.</p>
5.	<ul style="list-style-type: none"> Aggressive exclusion or suppression of foxes, cats, and, where relevant, overabundant populations of non-threatened native species such as Noisy Miners (<i>Manorina melanocaphala</i>) macropods. 	<p>No direct actions regarding the predation of WFC are discussed. Pest animal management procedure is unclear and non-specific. Actions regarding pest animals must be clear.</p>	<p>Table 7.2 added, detailing triggers for undertaking pest animal control actions.</p>
6.	<ul style="list-style-type: none"> Aggressive control of weed species not associated with WFC breeding habitat. 	<p>There is no exemption of Scotch Thistle from the side-wide weed management program. It is suggested that control of Scotch Thistle is avoided during WFC breeding season, given the assumption that it is WFC breeding habitat.</p> <p>Weed control programs are inconsistent across the</p>	<p>Minor text edits to Section 7.12.3 added. Clearer text that Appendix G is an overarching or broader weed management procedure for all zones with additional zone specific weed control measures identified for zone 2 in Appendix K.4.5</p>

		document. E.g., It is stated in Section 7.12.3 that Zone 2 will fall under the site-wide weed management procedure outlined in Appendix G. However, several Zone 2-specific procedures are later outlined in Appendix K.4.5.	
7.	Identify a specific and measurable performance criteria for each threat. This might be within a range <i>eg, >80% cover is comprised of indigenous species that support WFC breeding and <5% total cover comprised of weed species</i>	Performance criteria for pest animal control is non-specific.	<p>Updated throughout BMP</p> <p>Pest animal density levels will be defined by relative abundance categories as defined in the MERI framework for pest animal management in NSW (May 2020).</p> <p>The Pest animal Plan maybe further developed adaptively to include further refinement of performance criteria. At this stage relative abundance criteria will be used.</p>
8.	Detail an achievable monitoring program which is designed to assess the delivery of each performance criteria, e.g. <i>Management zones will be surveyed three times each breeding season for WFC utilisation, commencing two years after planting and continuing for the first 10 years of operation or until WFCs are consistently utilising management zones.</i>	<p>Pest animal monitoring program is unclear.</p> <p>Frequency of weed monitoring programs is inconsistent. Whether they are to be quarterly, annual or both is unclear.</p> <p>While the program for monitoring vegetation condition in Zone 2 is clearly defined, one survey per 5-year period may not be</p>	<p>Table 7.2 added.</p> <p>Frequency of weed monitoring is quarterly for the first two years and bi-annually years 3-10.</p>

		frequent enough to support effective management and prevent weed over abundance.	
9.	Identify a trigger (value outside of the target range) that would initiate adaptive management, e.g. <i>No WFC utilisation of a management zone for three consecutive surveys or weed species comprise greater than 10% total groundcover.</i>	Trigger for adaptive pest animal management is unclear, as criteria for “Moderate” or “High” is not clearly referenced.	<p>Table 7.2 added</p> <p>Pest animal density levels will be defined by relative abundance categories as defined in the MERI framework for pest animal management in NSW (May 2020).</p> <p>The Pest animal Plan maybe further developed adaptively to include further refinement of performance criteria. At this stage relative abundance criteria will be used.</p>
10.	Identify a realistic management action that is likely to place the variable back within the target range, e.g. <i>in-fill planting or spot application of herbicide.</i>	<p>I. Management action given as a response to a decline in vegetation condition is non-specific and does not include auditable actions.</p> <p>II. No actions have been identified for pest animal control.</p>	<p>i. Triggers for additional action for weed management includes the following objective: <i>Weed abundance not decreasing within exclusion zones; >50% non-native.</i> This has been updated in Table 7.2.</p> <p>ii. Pest animals actions have been included for each pest animal species in Table 7.2</p>

11.	Identify the person responsible for undertaking monitoring, identification of triggers, and commence the management action, e.g. <i>Blind Creek Solar Farm's Environmental Manager will be responsible for implementing a weed monitoring program.</i>	Listed in Table 7-1 (now Table 7.2).	Listed in Table 7.2 as the BCSF Environmental Manager
12.	Provide a timeframe for the monitoring program and achieving the target range. Interim performance criteria might be necessary.	Time frames for pest animal monitoring programs are unclear.	Table 7.2 updated to show the timeframes to include: <ul style="list-style-type: none"> • Quarterly during construction. • Annually during operation • Yearly report to BCS.
13.	Provide a reporting frequency to assess the delivery of each performance criteria.	No reporting frequencies have been clearly defined.	Table 7.2 updated to show the timeframes to include: <ul style="list-style-type: none"> • Quarterly during construction. • Annually during operation • Yearly report to BCS.
14.	Consider payment of a bond until performance criteria are met.	.	Discuss this with BCS as this requires further clarification.

From: David Carswell
To: Sarah Hillis
Cc: Dominic Osborne; Luke Osborne; Emily Walker; Lorena Blacklock; Michael Thompson; Nick Graham-Higgs; Michael Thompson
Subject: RE: 22-319 - Blind Creek Solar Farm RTS - Council Copy
Date: Wednesday, 7 September 2022 10:01:13 AM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png
Email-test_00bd0172-8f37-4e58-a3e6-5ce0cb6fcdcb.png

Sarah

Just a follow up. Yes can we get a copy of the final RTS before it is lodged. Also can you ensure that it refers to the draft Planning Agreement with QPRC. I've noticed in the past that some determinations include a condition regarding planning agreements.

Thanks

David Carswell
Service Manager - Land-Use Planning

Queanbeyan-Palerang Regional Council
Tel: 1300 735 025
Web: www.qprc.nsw.gov.au
Mail: PO Box 90 Queanbeyan NSW 2620



From: Sarah Hillis <sarah.h@nghconsulting.com.au>
Sent: Tuesday, 6 September 2022 1:47 PM
To: David Carswell <David.Carswell@qprc.nsw.gov.au>
Cc: Dominic Osborne <dosborne@treeworks.net.au>; Luke Osborne <luke@striderenewables.com>; Emily Walker <Emily.Walker@octopusinvestments.com>; Lorena Blacklock <Lorena.Blacklock@qprc.nsw.gov.au>; Michael Thompson <Michael.Thompson@qprc.nsw.gov.au>; Nick Graham-Higgs <nick.gh@nghconsulting.com.au>
Subject: RE: 22-319 - Blind Creek Solar Farm RTS - Council Copy

[EXTERNAL] This email originated from outside of the organisation. Please do not click links or open attachments unless you recognise the sender and know that the content is safe.

Good afternoon David

Thank you for your quick turn around and review of our draft Submissions, and thank you for your comments on the visual aspect. We are working on updating this response now. Would you like us to forward that final response to you? Or would you prefer to just see it in the final RTS once lodged?

Just to confirm, the following comments came from the exhibition of the VPA and not the EIS itself:

Adequate screening from Bungendore -Tarago Road needs to be factored in. As well as maintenance on the road from the increase in heavy vehicle movements. I do not agree with covering our land with glass and frames, I do not agree with the rapid push we are facing for a product that will last 30 years

I do not agree with covering our land with glass and frames, I do not agree with the rapid push we are facing for a product that will last 30 years

I would like to express my objection to the proposal for the Blind Creek Solar Farm on the following grounds:

1. The proposed site is too close to both current and future residential dwellings.
2. A Solar Farm of the proposed magnitude will certainly create visual pollution for the long term.
3. Solar panels are not a long-term sustainable power source. Within 10-15 years these panels will end up in land fill.
4. To minimize both the visual impact and the potential environmental impact of the solar farm, it should be located in an uninhabited area and far away from residences.

The Proponent will address these comments through the finalisation of the VPA process with Council, not in this RTS.

Kindest regards,

Sarah

SARAH HILLIS
PRINCIPAL CONSULTANT/REGIONAL MANAGER – PLANNING
BEnvSc, MEnvMgt

Please note I do not work Mondays

T. 02 6923 1562 M. 0413 343 912
E. sarah.h@nghconsulting.com.au
35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

QLD - NSW - ACT - VIC
WWW.NGHCONSULTING.COM.AU



NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

From: David Carswell <David.Carswell@qprc.nsw.gov.au>
Sent: Tuesday, 6 September 2022 9:44 AM
To: Sarah Hillis <sarah.h@nghconsulting.com.au>
Cc: Dominic Osborne <dosborne@treeworks.net.au>; Luke Osborne <luke@striderenewables.com>; Emily Walker <Emily.Walker@octopusinvestments.com>; Lorena Blacklock <Lorena.Blacklock@qprc.nsw.gov.au>; Michael Thompson <Michael.Thompson@qprc.nsw.gov.au>
Subject: RE: 22-319 - Blind Creek Solar Farm RTS - Council Copy

Good morning Sarah

I have received the following from one of my staff which I request be reviewed and considered:

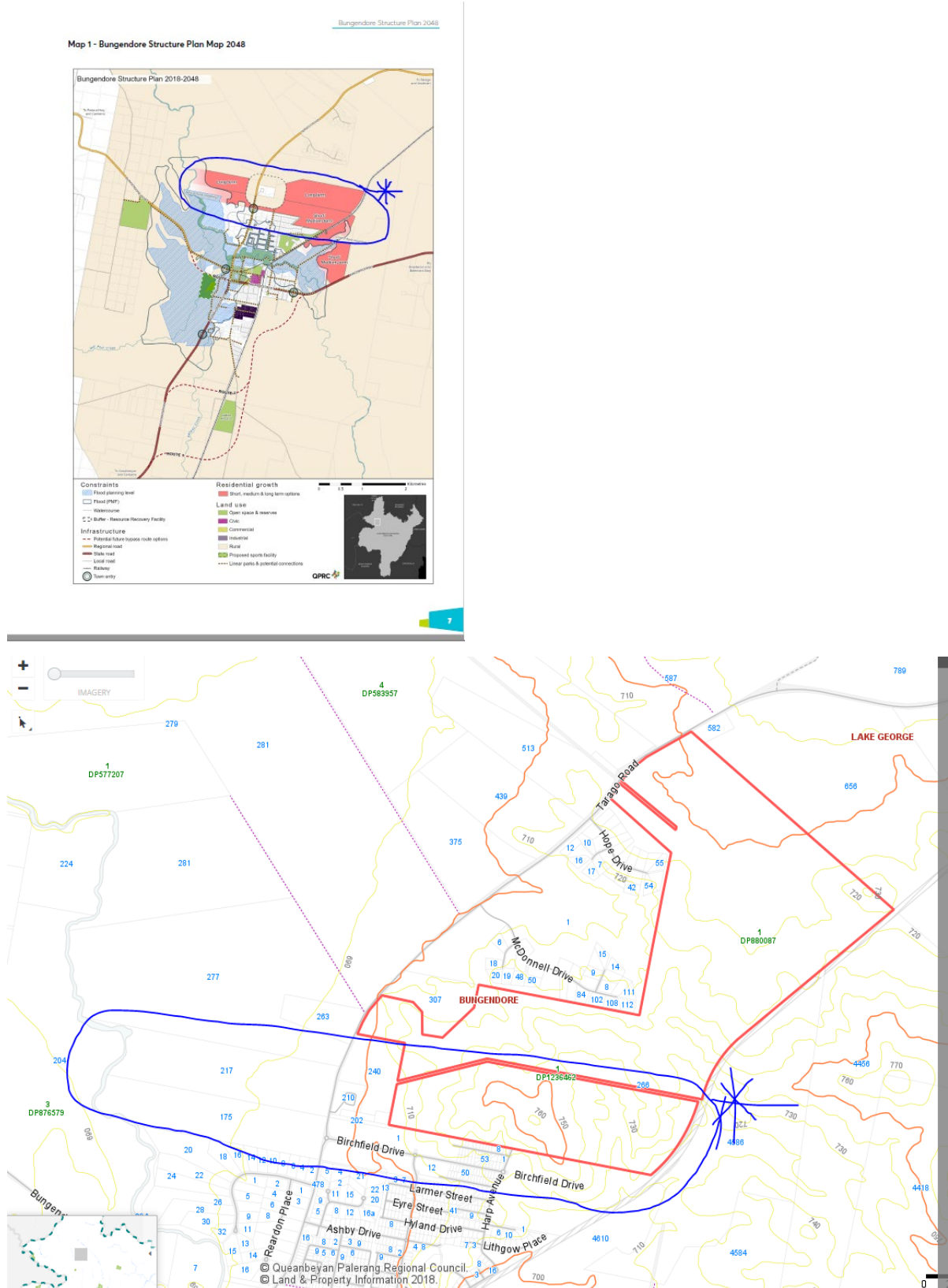
Hi Dave,

I have reviewed the applicant's view impact response in relation to the Bungendore Structure Plan and recommend the following be raised:

The response provided on pages 68-73 appears to misinterpreted the Bungendore Structure Plan (BSP) future residential investigation areas. The areas adopted by

Council are those shown in the salmon colour on Map 1 on page 7 of the Structure Plan. (see attached) Not map 5 as the applicant has used. The future residential investigation areas shown on Map 1 of the BSP include 176 Tarago Road which has an elevated section of up to approximately 760m, based on Council's contour map. The locations shown in the applicant's response column are not indicative of this location and are significantly lower in elevation (approximately 700m). Therefore the comments regarding view impact and landscape screening should be reviewed.

It is noted that the applicant responses for the glare impact have used the correct extent of the future residential areas of Map 1 in the BSP.



Lorena Blacklock (she/her/hers)
Program Coordinator - Land-Use Planning, Communities and Spatial
Tel: (02) 6285 6524 Mob: 0487 097 346

Also a number of matters have been raised in submissions on the draft Planning Proposal following its recent exhibition that are more relevant to the DA.

Notwithstanding that submissions closed early in July, can I get you to review these and to respond:

Adequate screening from Bungendore -Tarago Road needs to be factored in. As well as maintenance on the road from the increase in heavy vehicle movements. I do not agree with covering our land with glass and frames, I do not agree with the rapid push we are facing for a product that will last 30 years

I do not agree with covering our land with glass and frames, I do not agree with the rapid push we are facing for a product that will last 30 years

I would like to express my objection to the proposal for the Blind Creek Solar Farm on the following grounds:

1. The proposed site is too close to both current and future residential dwellings.
2. A Solar Farm of the proposed magnitude will certainly create visual pollution for the long term.
3. Solar panels are not a long-term sustainable power source. Within 10-15 years these panels will end up in land fill.
4. To minimize both the visual impact and the potential environmental impact of the solar farm, it should be located in an uninhabited area and far away from residences.

Thanks

David Carswell
Service Manager - Land-Use Planning

Queanbeyan-Palerang Regional Council
Tel: [1300 735 025](tel:1300735025)
Web: www.qprc.nsw.gov.au
Mail: PO Box 90 Queanbeyan NSW 2620



From: Sarah Hillis <sarah.h@nghconsulting.com.au>
Sent: Friday, 2 September 2022 6:49 AM
To: David Carswell <David.Carswell@qprc.nsw.gov.au>
Cc: Dominic Osborne <dosborne@treeworks.net.au>; Luke Osborne <luke@striderenewables.com>; Emily Walker <Emily.Walker@octopusinvestments.com>
Subject: FW: 22-319 - Blind Creek Solar Farm RTS - Council Copy

[EXTERNAL] This email originated from outside of the organisation. Please do not click links or open attachments unless you recognise the sender and know that the content is safe.

Good morning David

NGH have just completed the soft lodgement of the draft Response to Submissions for Blind Creek

As requested, please see our draft copy for your input and consideration for the final version.

[22-319 - Blind Creek Solar Farm Submissions Report DRAFT V1.0 20220826.docx](#)

Kindest regards,

Sarah

SARAH HILLIS
PRINCIPAL CONSULTANT/REGIONAL MANAGER – PLANNING
BEnvSc, MEnvMgt

Please note I do not work Mondays

T. 02 6923 1562 M. 0413 343 912
E. sarah.h@nghconsulting.com.au
35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

QLD · NSW · ACT · VIC
WWW.NGHCONSULTING.COM.AU



NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

This message has been scanned for malware by Websense. www.websense.com

Subject: FW: Blind Creek Solar Farm - road usage proposal

Begin forwarded message:

From: Dom Osborne <dosborne@treeworks.net.au>
Subject: Blind Creek Solar Farm - road usage proposal
Date: 19 September 2022 at 5:20:27 pm AEST
To: Dave Carswell <david.carswell@qprc.nsw.gov.au>, Michael Thompson <Michael.Thompson@qprc.nsw.gov.au>
Cc: Luke Osborne <luke@striderenewables.com>, Emily Walker <emily.walker@octopusinvestments.com>

Hi David and Michael,

During our EIS submissions period we have had enquiries as to what we intend to do about possible road damage caused by 18 months of construction traffic. We have struggled with the concept of a preparing a dilapidation report during and after construction due to what appears to be an ever increasing amount of heavy traffic using the Tarago Road, ie Woodlawn, new sand or gravel quarries near Tarago etc. It is also hard to plan around what non-BCSF traffic might look like in a couple of years time when we hope to start construction. As you are aware there is a large amount of road repair currently being performed which presumably will lessen the risk of damage by our construction traffic.

We are working up a proposal to QPRC to pay a road royalty much like some sand quarries within QPRC currently pay, ie a royalty per ton of materials imported onto our site per kilometre of QPRC road we use. In our case that would mostly be from the boundary of Goulburn Mulwaree Council to our site entrance as most construction materials will come in through Tarago.

Can you please indicate if such a proposal would be acceptable to QPRC as opposed to preparing a dilapidation report and paying for any damage that report might identify? It would be great to get a response to this issue asap as DPE has just requested us to include detail of a solution in our Response to Submissions Report.

Regards

Dom Osborne
Blind Creek Solar Farm
0403 450 872

From: [Dom Osborne](#)
To: tash.woods@goulburn.nsw.gov.au
Cc: [Sarah Hillis](#); [Luke Osborne](#); council@goulburn.nsw.gov.au; [Emily Walker](#)
Subject: TW:1619500 - Blind Creek Solar Farm
Date: Wednesday, 21 September 2022 5:32:32 PM

Dear Mr. O'Rourke,

During the Blind Creek Solar Farm (BCSF) EIS exhibition period you made a submission on behalf of Goulburn Mulwaree Council (GMC). In our Response To Submissions report about to be submitted to the Department of Planning and Environment (DPE) we will address the last 5 dot points in your submission. We would like to start a conversation with you regarding the 1st dot point, as below:

Any approval granted to include a condition to rectify any road damage due to construction traffic. A road dilapidation survey is to be carried out prior to construction and submitted to GMC for review and endorsement.

We are struggling with the concept of a preparing a dilapidation report due to what appears to be an ever increasing amount of heavy traffic using the Tarago Road, ie Woodlawn from both directions, new sand or gravel quarries near Tarago etc. It is also hard to plan around what non-BCSF traffic might look like in a couple of years time when we hope to start construction.

We are working up a proposal to GMC to instead pay a road royalty much like some sand quarries currently pay to Queanbeyan Palerang Regional Council, ie a royalty per ton of construction materials imported onto our site.

We are also cognisant of concern by residents of Tarago as to the condition of the road through Tarago and the volume of traffic currently passing through Tarago. If GMC are able to agree to a royalty scheme we would like to see the funds dedicated to the township of Tarago.

Can you please indicate if such a proposal would be acceptable to GMC as opposed to preparing a dilapidation report and paying for any damage that report might identify? It would be great to get a response to this issue asap as DPE has just requested us to include detail of a solution in our Response to Submissions Report.

Regards

Dom Osborne
Blind Creek Solar Farm
0403 450 872

Sarah Hillis

From: Dom Osborne <dosborne@treeworks.net.au>
Sent: Friday, 26 November 2021 2:46 PM
To: Lands-Water Roads Newcastle Mailbox
Subject: Re: Application to purchase Enclosure Permit 49717
Attachments: roads-crown-road-purchase-application 26 Nov 2021.pdf; ILetter LR DPIE to DO issued SEARs Cover Letter 11 Feb 2021.pdf; Letter LR DPIE to DO Issued SEARs 11 Feb 2021.pdf; 20211124_BlindCreekSF_CrownLands.pdf

Dear Sandra and DPIE-Crown Land,

As discussed the application I emailed on 18 November was not the correct one. Please find attached the application form you provided a link for. Could you please also refer to the documents attached to my email on 18 November in support of this application

I also wish to apply to have this case prioritised. The reason for making application to prioritise is that the crown road forms part of a state significant development application to build a large scale solar farm. Please also see attached to this email the Department of Planning, Industry and Environment's Planning Secretary's Environmental Assessment Requirements (SEARs). The state significant projects name is Blind Creek Solar Farm, SSD 13166280. The contact officer within DPIE is Lander Robinson Lander.Robinson@planning.nsw.gov.au .

You will notice on the map enclosed on my email on 18 November that this crown road no longer has any useful function or potential to be useful. It has become isolated (orphaned) since crown roads were established and can not serve any purpose with regard to providing access to any other parcel of land. The only neighbours to the road are my sisters who have been consulted and concur that the road now has no relevance or potential for future use.

Also please find attached for your information a map of the proposed solar farm demonstrating how Enclosure Permit 49717 interacts with the solar farm proposal. A portion of the road would have solar panels installed on it.

Please note I have paid the application fee into the land account related to Enclosure Permit 49717.

Feel free to contact me anytime if you require more information. In the mean time please consider this application to prioritise this case.

Regards

Dominic Osborne
0403 450 872

On 19 Nov 2021, at 2:27 pm, Lands-Water Roads Newcastle Mailbox
<roads.newcastle@crownland.nsw.gov.au> wrote:

Hi Dominic

Thank you for your email.

As mentioned please see attached the crown road purchase application link under Crown road sale and closures;

<https://www.industry.nsw.gov.au/lands/access/roads>

There is a fact sheet on the website too you may wish to read for additional information.

As discussed the application can take several years to be allocated to a case officer.

To have a case prioritised, you will need to provide a reason and evidence to substantiate the request.

Examples of priority reasons being:

- Closure of the Crown road may be a condition of approval for a Development Application (DA)
- The Crown road may prevent the lodgement of a DA
- Buildings have been erected on the Crown road which are affecting the sale of the property

What we will need from you

Supporting documentation such as:

- a copy of a current Development Application (DA) - including reference and/or impact to the Crown road under application.
- if no DA has been lodged then a letter with a supporting diagram from the Council advising you are unable to lodge the DA until the road closure has been dealt with.
- you may provide any other information such as photographs, diagrams, maps or surveyor's reports to help support the request.
- any other information or reasons to support the request

This request may be sent via email to this address. Once received the information will then be reviewed and considered by the management team in determining if the application is suitable for priority processing.

If you need any further information please do not hesitate to contact us.

Kind Regards
Sandra *for*

Newcastle Roads Team | Business Centre, Newcastle
Housing & Property - Crown Lands
NSW Department of Planning, Industry & Environment
6 Stewart Ave | Newcastle NSW 2300
T: 02 4925 4104 | F: 02 4925 3517 | E: roads.newcastle@crowmland.nsw.gov.au
W: www.dpie.nsw.gov.au

From: Dom Osborne <dosborne@treeworks.net.au>
Sent: Thursday, 18 November 2021 12:31 PM
To: Lands-Water CL Enquiries Mailbox <cl.enquiries@crowmland.nsw.gov.au>
Subject: Application to purchase Enclosure Permit 49717

To whom it may concern within NSW Dept Planning - Crown Lands,

Please find attached application to purchase crown land.

This application is necessitated by a State Significant Development application about to be submitted to the Department of Planning to build a large scale solar farm. The proposed solar array would sit on top of the subject enclosure permit.

Please find attached application, the letter from the Registrar of Aboriginal Land Claims, the trust deed of the proponent Osborne Family Trust and a map depicting the location.

Please feel free to contact me should you require more information

Yours sincerely

Dominic Osborne
Director
Lakelands Pty Ltd ATF Osborne Family Trust
0403 450 872

<20211110 - S666 - Search Response Letter - Lakelands Pty Ltd.pdf><enquiry-to-purchase-Crown-Land-application.pdf><Osborne Family Trust.pdf><Map of crown land within Lot 2 DP 1154765.pdf>

Mr Dominic Osborne
Director
Blind Creek Solar Farm Pty Ltd
114 Currandooley Road
LAKE GEORGE NSW 2621
Email: dosborne@treeworks.net.au

11/02/2021

Dear Mr Osborne

Blind Creek Solar Farm (SSD-13166280)
Planning Secretary's Environmental Assessment Requirements

Please find attached a copy of the Planning Secretary's environmental assessment requirements for the preparation of an Environmental Impact Statement (EIS) for the Blind Creek Solar Farm (see Attachment 1).

The requirements are based on the information you have provided to date and have been prepared in consultation with relevant government agencies. The agency comments are attached for your information (see attachment 2). Please consult with Biodiversity Conservation Services prior to the preparation of the biodiversity development assessment report as it has identified errors in the mapping of Category 1 land on the project site. Advice from Queanbeyan-Palerang Council, NSW Mining, Exploration & Geoscience (MEG) and the Rural Fire Service is still outstanding and will be forwarded at a later date.

The Department may modify these requirements at any time, and that you must consult further with the Department if you do not lodge a development application and EIS for the project within the next two years.

The Department wishes to emphasise the importance of effective and genuine community consultation where a comprehensive open and transparent community consultation engagement process must be undertaken during the preparation of the EIS. This process must ensure that the community is provided with a good understanding of what is proposed, a description of any potential impacts and they are actively engaged in issues of concern to them.

Please contact the Department at least two weeks before you plan to submit your development application and EIS for the project. This will enable the Department to:

- confirm the applicable fee (see Division 1AA, Part 15 of the *Environmental Planning and Assessment Regulation 2000*); and
- determine the required number of copies of the EIS.

The Department will review the EIS for the project before putting it on public exhibition. If it fails to adequately address these requirements, you will be required to submit an amended EIS.

If your proposal contains any actions that could have a significant impact on matters of National Environmental Significance, it will require an approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This approval is in addition to any approvals required under NSW legislation. If you have any questions about the application of the EPBC Act to your proposal, you should contact the Department of Agriculture, Water and the Environment in Canberra (6274 1111 or www.awe.gov.au).

If you have any questions, please contact Lander Robinson on 92746052 or via email at Lander.Robinson@planning.nsw.gov.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'Nicole Brewer', with a stylized flourish extending to the right.

Nicole Brewer
Director
Energy Assessments

Attachment 1 – Planning Secretary's Environmental Assessment Requirements
Attachment 2 – Agency advice

Planning Secretary's Environmental Assessment Requirements

Section 4.12(8) of the *Environmental Planning and Assessment Act 1979* Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*

Application Number	SSD 13166280
Project Name	Blind Creek Solar Farm which includes: <ul style="list-style-type: none"> · the construction and operation of a solar photovoltaic (PV) energy generation facility with an estimated capacity of up to 400 MW; and · associated infrastructure, including grid connection and battery storage of approximately 300 MW/300 MWh
Location	Tarago Road, approximately 8 km north of Bungendore, NSW and 50 km east of Canberra, ACT in the Queanbeyan-Palerang local government area.
Applicant	Blind Creek Solar Farm Pty Ltd
Date of Issue	11/02/2021
General Requirements	<p>The environmental impact statement (EIS) for the development must comply with the requirements in Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i> (the Regulation).</p> <p>In particular, the EIS must include:</p> <ul style="list-style-type: none"> · a stand-alone executive summary; · a full description of the development, including: <ul style="list-style-type: none"> - details of construction, operation and decommissioning; - a site plan showing all infrastructure and facilities (including any infrastructure that would be required for the development, but the subject of a separate approvals process); - a detailed constraints map identifying the key environmental and other land use constraints that have informed the final design of the development; · a strategic justification of the development focusing on site selection and the suitability of the proposed site with respect to potential land use conflicts with existing and future surrounding land uses (including other proposed or approved solar farms, wind farms, rural residential development and subdivision potential); · an assessment of the likely impacts of the development on the environment, focusing on the specific issues identified below, including: <ul style="list-style-type: none"> - a description of the existing environment likely to be affected by the development; - an assessment of the likely impacts of all stages of the development, (which is commensurate with the level of impact), including any cumulative impacts of the site and existing, approved or proposed developments in the region (including the Capital Solar Farm (MP10_0121) (as modified), the Capital Wind Farm (MP05_0179) (as modified) and the Capital Wind Farm – Stage 2 (MP10_0135)) and impacts on the site and any road upgrades, taking into consideration any relevant legislation, environmental planning instruments, guidelines, policies, plans and industry codes of practice; - a description of the measures that would be implemented to avoid, mitigate and/or offset the impacts of the development (including draft management plans for specific issues as identified below); and - a description of the measures that would be implemented to monitor and report on the environmental performance of the development;

	<ul style="list-style-type: none"> · a consolidated summary of all the proposed environmental management and monitoring measures, identifying all the commitments in the EIS; and · the reasons why the development should be approved having regard to: <ul style="list-style-type: none"> - relevant matters for consideration under the <i>Environmental Planning and Assessment Act 1979</i>, including the objects of the Act and how the principles of ecologically sustainable development have been incorporated in the design, construction and ongoing operations of the development; - the suitability of the site with respect to potential land use conflicts with existing and future surrounding land uses; and - feasible alternatives to the development (and its key components), including the consequences of not carrying out the development. · a detailed consideration of the capability of the project to contribute to the security and reliability of the electricity system in the National Electricity Market, having regard to local system conditions and the Department's guidance on the matter; and · a detailed evaluation of the merits of the project as a whole. <p>The EIS must also be accompanied by a report from a suitably qualified person providing:</p> <ul style="list-style-type: none"> · a detailed calculation of the capital investment value (CIV) (as defined in clause 3 of the Regulation) of the proposal, including details of all assumptions and components from which the CIV calculation is derived; and · certification that the information provided is accurate at the date of preparation. <p>The development application must be accompanied by the consent in writing of the owner/s of the land (as required in clause 49(1)(b) of the Regulation).</p>
Key issues	<p>The EIS must address the following specific matters:</p> <ul style="list-style-type: none"> · Biodiversity – including: <ul style="list-style-type: none"> - an assessment of the biodiversity values and the likely biodiversity impacts of the project in accordance with Section 7.9 of the <i>Biodiversity Conservation Act 2016</i> (NSW), the Biodiversity Assessment Method (BAM) and documented in a Biodiversity Development Assessment Report (BDAR), unless BCS and DPIE determine the proposed development is not likely to have any significant impacts on biodiversity values; - the BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the BAM; - if an offset is required, details of the measures proposed to address the offset obligation; and - an assessment of the likely impacts on listed aquatic threatened species, populations or ecological communities, scheduled under the <i>Fisheries Management Act 1994</i>, potential impacts to fish passage and a description of the measures to minimise and rehabilitate impacts. · Heritage – including an assessment of the likely Aboriginal and historic heritage (cultural and archaeological) impacts of the development and consultation with the local Aboriginal community in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i>; · Land – including: <ul style="list-style-type: none"> - an assessment of the potential impacts of the development on existing land uses on the site and adjacent land, including: <ul style="list-style-type: none"> o a consideration of agricultural land, flood prone land, Crown lands, (including Crown Roads) mining, quarries, mineral or petroleum rights; o a soil survey to determine the soil characteristics and consider the potential for erosion to occur; and

- o a cumulative impact assessment of nearby developments,
- an assessment of the compatibility of the development with existing land uses, during construction, operation and after decommissioning, including:
 - o consideration of the zoning provisions applying to the land including subdivision;
 - o completion of a Land Use Conflict Risk Assessment in accordance with the Department of Industry's *Land Use Conflict Risk Assessment Guide*; and
 - o assessment of impact on agricultural resources and agricultural production on the site and region.
- **Visual** – including a detailed assessment of the likely visual impacts (including any glare and reflectivity and night lighting) of all components of the project (including arrays, transmission lines, substations and any other ancillary infrastructure) on surrounding residences and key locations, scenic or significant vistas, air traffic and road corridors in the public domain and provide details of measures to mitigate and/or manage potential impacts (including a draft landscaping plan for on-site perimeter planting, with evidence it has been developed in consultation with affected landowners);
- **Noise** – including an assessment of the construction noise impacts of the development in accordance with the *Interim Construction Noise Guideline* (ICNG), operational noise impacts in accordance with the *NSW Noise Policy for Industry* (2017), cumulative noise impacts (considering other developments in the area), and a draft noise management plan if the assessment shows construction noise is likely to exceed applicable criteria;
- **Transport** – including:
 - an assessment of the peak and average traffic generation, including over-dimensional vehicles and construction worker transportation;
 - an assessment of the likely transport impacts to the site access route (including, but not limited to, Tarago Road, Currandooley Road, Bungendore Road, Braidwood Road, Kings Highway, Hume Highway and Federal Highway), site access point(s), any Crown land, particularly in relation to the capacity and condition of the roads, road safety and intersection performance;
 - a cumulative impact assessment of traffic from nearby developments; and
 - provide details of measures to mitigate and / or manage potential impacts including a schedule of all required road upgrades (including resulting from heavy vehicle and over mass / over dimensional traffic haulage routes), road maintenance contributions, and any other traffic control measures, developed in consultation with the relevant road authority;
- **Water** – including:
 - an assessment of the likely impacts of the development (including flooding) on surface water and groundwater resources (including Bridge Creek, Butmaroo Creek, Wright Creek, Lake George) and other watercourses traversing or surrounding the site, drainage channels, wetlands, riparian land, farm dams, groundwater dependent ecosystems and acid sulfate soils, related infrastructure, adjacent licensed water users and basic landholder rights, and measures proposed to monitor, reduce and mitigate these impacts;
 - details of water requirements and supply arrangements for construction and operation; and
 - a description of the erosion and sediment control measures that would be implemented to mitigate any impacts in accordance with *Managing Urban Stormwater: Soils & Construction* (Landcom 2004);
- **Hazards** – including:

	<ul style="list-style-type: none"> - an assessment of potential hazards and risks including but not limited to bushfires, electromagnetic fields for the proposed grid connection infrastructure against the <i>International Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines for limiting exposure to Time-varying Electric, Magnetic and Electromagnetic Fields</i>; and - a Preliminary Hazard Analysis prepared in accordance with <i>Hazardous Industry Planning Advisory Paper No. 6 – Guideline for Hazard Analysis</i> (DoP, 2011) and <i>Multi-Level Risk Assessment</i> (DoP, 2011); · Socio-Economic – including an assessment of the likely impacts on the local community, any demands on Council infrastructure and a consideration of the construction workforce accommodation; and · Waste – identify, quantify and classify the likely waste stream to be generated during construction and operation, and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste.
Consultation	<p>During the preparation of the EIS, you should consult with relevant local, State or Commonwealth Government authorities, infrastructure and service providers, community groups, affected landowners and any exploration licence and/or mineral title holders.</p> <p>In particular, you must undertake detailed consultation with affected landowners surrounding the development and Queanbeyan-Palerang Regional Council.</p> <p>The EIS must describe the consultation process and the issues raised and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p>
Further consultation after 2 years	<p>If you do not lodge a Development Application and EIS for the development within 2 years of the issue date of these SEARs, you must consult further with the Planning Secretary in relation to the preparation of the EIS.</p>
References	<p>The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans as identified. A list of some of the legislation, policies and guidelines that may be relevant to the assessment of the project can be found at:</p> <ul style="list-style-type: none"> · https://www.planningportal.nsw.gov.au/major-projects/assessment/policies-and-guidelines; and · http://www.environment.gov.au/epbc/publications#assessments

Department of Planning and Environment

Letter to Applicant
(consent granted)

Our reference:22/01616
LOC No: 632206

Mr Dominic Osborne
Lakelands Pty Ltd
114 Currandooley Road
BUNGENDORE NSW 2621

Dear Sir/Madam

Consent for Development Comprising:	Construction and Operation of a Large-Scale Solar Farm (SSD-13166280)
Crown Land	Lot 1 & 2 DP 1154765 Lot 1 DP 456698
Crown reserve	Crown road
Parish	Currandooley
County	Murray
Applicant	Dominic Osborne

Consent is granted by the Minister for Lands and Water to the lodgement of applications for “Exhibition of the Environmental Impact Statement” for the construction and operation of a large scale solar farm under clause 49(1)(b) of the Environmental Planning and Assessment Regulation 2000, and other associated applications required under other legislation, for the development proposal described above.

The Land Owner Consent is granted conditional to the following:

1. Land Owner Consent will expire after a period of 12 months from the date of this letter if not acted on within that time. Extensions of this consent may be sought
2. You are required to forward a copy of the development approval to the NSW Department of Planning & Environment – Crown Lands (“the department”) after approval and prior to commencing works.
3. You are required to ensure that the approval provided is consistent with this Land Owner Consent.
4. The Land Owner Consent is provided for the works detailed on the plans provided by you and retained by the department as DOC21/249618.

Land Owner Consent is granted in accordance with the following:

- Land Owner Consent is given without prejudice so that consideration of the proposed development may proceed under the *Environmental Planning and Assessment Act 1979* and any other relevant legislation.
- The grant of this Land Owner Consent does not guarantee that any subsequent authority to occupy the Crown road will be granted.

- Land Owner Consent does not imply the concurrence of the Minister for Lands and Water for the proposed development and does not provide authorisation under the Crown Lands Act 2016 for this proposal.
- The issue of Land Owner Consent does not prevent the department from making any submission commenting on, supporting or opposing an application.
- The Minister reserves the right to issue Land Owner Consent for the lodgement of applications for any other development proposals on the subject land concurrent with this Land Owner Consent.
- Any changes made to the proposal, including those imposed by the consent authority, must be consistent with the Land Owner Consent and therefore if modifications are made to the proposed development details must be provided to the department for approval.
- Land Owner Consent also allows application to any other approval authority necessary for this development proposal.

It is important that you understand your obligations relating to Condition 3. If any alterations are made to the application (whether in the course of assessment, by conditions of consent, or otherwise), it is your responsibility to ensure the amended or modified development remains consistent with this Land Owner Consent. If there is any inconsistency or uncertainty you are required to contact the department before undertaking the development to ensure that the Department consents to the changes. A subsequent LOC application may incur additional application fees.

On review of the site plan submitted with this LOC it appears to show solar panels across the Crown road in Lot 2 DP 1154765 as well as an easement for underground cables under a section of the Crown Road located in Lot 1 DP 456698. It is therefore recommended that consent be sought under:

1. S138 of the Roads Act 1993 prior to any works in on or over a Crown road be undertaken,
2. S152A to authorise the occupation or use of Crown roads by works and structures, or
3. S71 to carry out road works for access purposes (S71).

It is further recommended that the proponent lodge an application to close and purchase the Crown Roads impacted by this development.

It was also noted that the location of the Laydown & Site Offices is within the boundaries of Public Road 6141-1603 gazetted as a public road in Gazette 30th Aug 1899 Fol 6531. It is recommended that you liaise with the Queanbeyan Palerang Council on this matter.

During the assessment the department conducted an Aboriginal Heritage Information Management System (AHIMS) search and multiple Aboriginal sites and/or Aboriginal places have been recorded in or near the proposed development site and/or there are natural landscape features that indicate the potential presence of Aboriginal heritage in or near the proposed development site. You are required to undertake the due diligence process to identify if any Aboriginal heritage is present at or nearby the proposal site and should seek further advice from the NSW Office of Environment, Energy and Science.

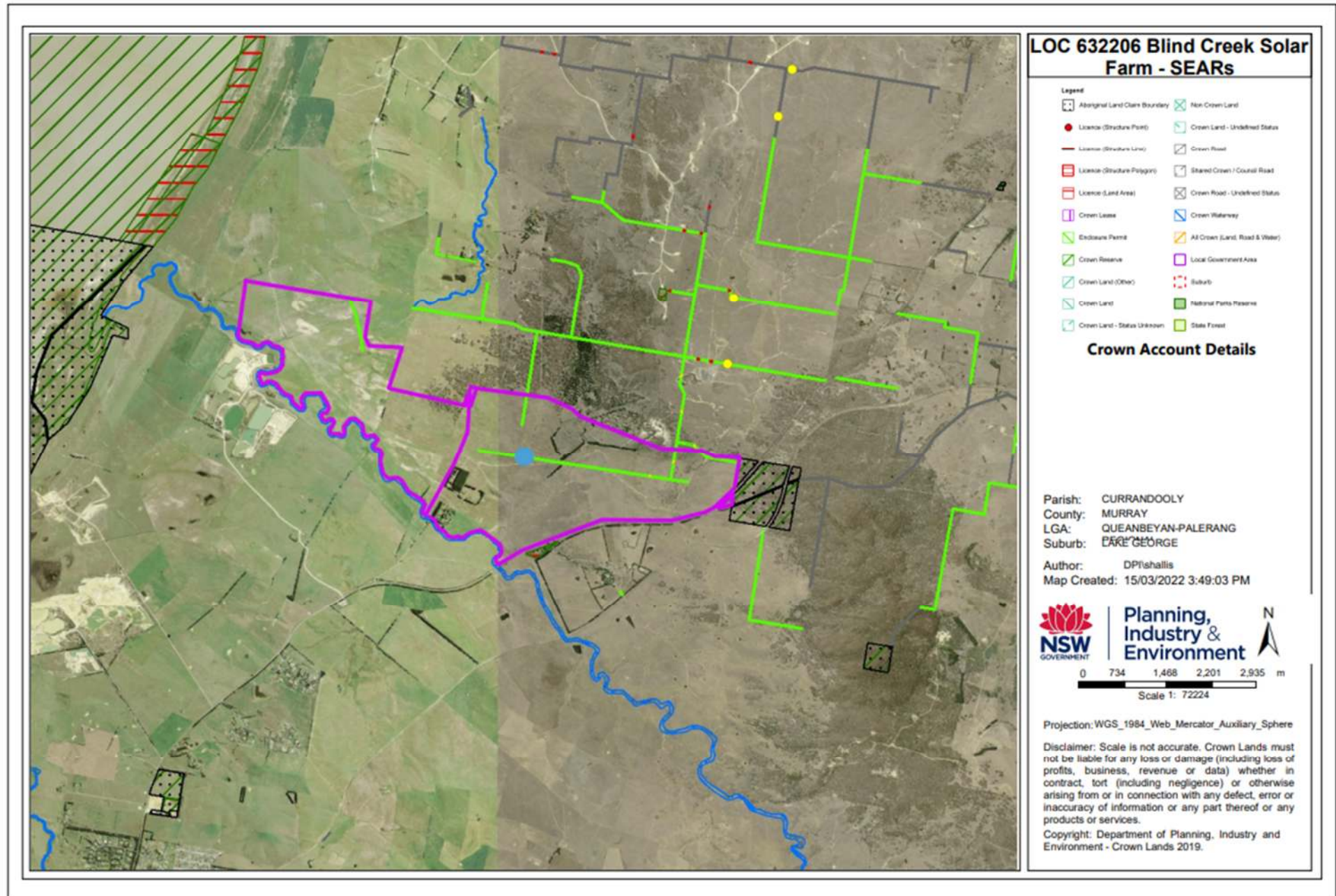
For further information, please contact me on 4824 3761 or email sue.shallis@crownland.nsw.gov.au

Yours sincerely



Sue Shallis
Property Services Officer
Department of Planning, Industry & Environment - Crown Lands
28 March 2022

Attachment A – Location Map



Crown road purchase application form

Use this form to apply to purchase a Crown road.

Fee

\$679.80 — For further information on fees, please refer to the roads fee schedule provided on the NSW Department of Planning, Industry & Environment – Crown Lands website www.industry.nsw.gov.au/lands

Contact us

For more information, please contact us at:

NSW Department of Planning, Industry & Environment – Crown Lands
PO Box 2155
DANGAR NSW 2309

Phone: 1300 886 235 (option 2)
Fax: 02 4925 3517
Email: roads.newcastle@crowmland.nsw.gov.au
Web: www.industry.nsw.gov.au/lands

Privacy statement

The personal information you provide on this form is subject to the *Privacy & Personal Information Protection Act 1989*. It is being collected by NSW Department of Planning, Industry & Environment and will be used for purposes related to this application. NSW Department of Industry will not disclose your personal information to anybody else unless authorised by law. The provision of this information is voluntary or required to be supplied. If you choose not to provide the requested information we may not be able to process this application. You have the right to request access to, and correct details of, your personal information held by the department. Further information regarding privacy can be obtained from the NSW Department of Planning, Industry & Environment website at www.industry.nsw.gov.au/legal/privacy

Contact details

Table 1. Your details

Salutation	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Ms <input type="checkbox"/> Miss <input type="checkbox"/> Dr <input type="checkbox"/> Other:	
Given name	(1)	(2)*
Family name		
Business name		
ACN		
Residential address		
Postal address		
Work telephone		
Home telephone		
Mobile		
Email address		

*For additional owners, please attach details to this form

Property details

Table 2. The property

Lot		DP	
Road is (tick appropriate)	<input type="checkbox"/> within <input type="checkbox"/> adjacent <input type="checkbox"/> both		
Lot		DP	
Road is (tick appropriate)	<input type="checkbox"/> within <input type="checkbox"/> adjacent <input type="checkbox"/> both		
Lot		DP	
Road is (tick appropriate)	<input type="checkbox"/> within <input type="checkbox"/> adjacent <input type="checkbox"/> both		
Lot		DP	
Road is (tick appropriate)	<input type="checkbox"/> within <input type="checkbox"/> adjacent <input type="checkbox"/> both		

*For additional roads, please attach details to this form

Consent of adjoining or affected landholders

Before you lodge an application, we recommend that you discuss the proposal to purchase the Crown road with adjoining and/or other affected landowners, including any government authority responsible for the

management of affected land or waterways. If agreement cannot be reached with the affected landholders, an application can still be lodged with the department and the access issues will be assessed and determined by the department when we begin processing the application.

List the names of all known landholders likely to be affected by the sale of Crown roads subject to this application.

Table 3. Landholders

Name of land holder	Lot/DP or property address	Comments or consultation
		The road is adjacent to this DP. The road has become isolated and can not be used as access for this Lot

Tenures associated with this application (if any)

Table 4. Tenures

Enclosure Permit no.	
Licence no.	
Lease no.	
Other tenure	

Supporting documentation

Please provide a diagram of the Crown roads subject to this application (if possible).

If you have consulted a relevant authority such as the Office of Environment & Heritage (National Parks), or the Department of Primary Industries - Fishing, please provide copies of correspondence or advice to support your application.

To find out more visit www.industry.nsw.gov.au/lands

Please note: Incomplete applications cannot be processed.

Declaration

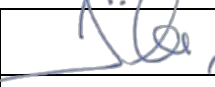
Table 5. Declaration

<input type="checkbox"/> I	<input type="checkbox"/> We	
----------------------------	-----------------------------	--

apply to purchase Crown roads enclosed within or adjacent to my/our property. By making this application I/we agree and acknowledge the department will:

1. undertake investigations to identify all public roads in the vicinity
2. consult other parties in the assessment of this application
3. charge third-party fees associated with this application and note that these charges are subject to change
4. accept this application as an intention to purchase Crown roads if suitable for sale
5. undertake assessments which may result in Crown roads under application not being suitable for sale
6. retain fees paid for withdrawal of this application or failure to proceed.

Table 6. Signatures and dates

Signature of applicant/s		Date	
Signature of applicant/s		Date	
Signature of applicant/s		Date	
Signature of applicant/s		Date	

Fee

Fee has been paid to Land Account associated with Enclosure Permit 49717

Tick appropriate:

- ☐ \$679.80 Pay by cheque. Enclose a cheque payable to NSW Department of Planning, Industry & Environment – Crown Lands.
- ☐ \$679.80 Pay by money order. Enclose a money order payable to NSW Department of Planning, Industry & Environment – Crown Lands.

Lodgement

Mail to: NSW Department of Planning, Industry & Environment – Crown Lands, PO Box 2155, DANGAR NSW 2309

Office use only – Refer to the Receipting and Referrals Codes Document						
<input type="checkbox"/> BCN	Referral Code	BCNRD	Receipting Code	RP	CM9	
Fee Paid		Receipt Number		Account number		
Date						

Sarah Hillis

From: Tim Mahoney <Tim.Mahoney@transport.nsw.gov.au>
Sent: Tuesday, 27 September 2022 7:40 AM
To: Sarah Hillis
Subject: RE: 22-319 - Blind Creek Solar Farm Response to Submission - TfNSW response

Good Morning Sarah,

The information/response below is noted. TfNSW will wait for the new request for comment regarding your submission from the responsible officer and liaise with you and also the department of planning and environment accordingly.

Kind Regards,

Tim

From: Sarah Hillis <sarah.h@nghconsulting.com.au>
Sent: Monday, 26 September 2022 10:24 AM
To: Tim Mahoney <Tim.Mahoney@transport.nsw.gov.au>
Subject: Re: 22-319 - Blind Creek Solar Farm Response to Submission - TfNSW response

CAUTION: This email is sent from an external source. Do not click any links or open attachments unless you recognise the sender and know the content is safe.

Hi Tim

Unfortunately this isn't possible, as the final technology has not been selected.

This will come when the EPC contractor has been awarded, and final design approved.

As such, there is no way at this stage to know the final size of heavy vehicles and therefore what (if any) road upgrades will be required.

It is our understanding that this is normal practice for solar farms, and other large scale SSD projects, that this information be assessed as part of the Traffic Management and Haulage Plans.

Kindest regards,

Sarah

Get [Outlook for Android](#)

From: Tim Mahoney <Tim.Mahoney@transport.nsw.gov.au>
Sent: Monday, September 26, 2022 8:50:55 AM
To: Sarah Hillis <sarah.h@nghconsulting.com.au>
Subject: RE: 22-319 - Blind Creek Solar Farm Response to Submission - TfNSW response

Good Morning Sarah,

TfNSW preference is to assess the below mentioned information prior to the application proceeding so any issues, and associated changes, upgrades or works to the road network can be addressed as early as possible.

Hope this helps.

Kind regards,
Tim

From: Sarah Hillis <sarah.h@nghconsulting.com.au>
Sent: Friday, 23 September 2022 10:13 AM
To: Tim Mahoney <Tim.Mahoney@transport.nsw.gov.au>
Subject: RE: 22-319 - Blind Creek Solar Farm Response to Submission - TfNSW response

You don't often get email from sarah.h@nghconsulting.com.au. [Learn why this is important](#)

CAUTION: This email is sent from an external source. Do not click any links or open attachments unless you recognise the sender and know the content is safe.

Thank you Tim

To allow for timely lodgement and information requirements, is this additional information something that would normally/could be requested as part of the Traffic Management Plan? The details of heavy vehicles will be known prior to the delivery of the TMP, which of course would also be provided to TfNSW for their input and consideration.

SARAH HILLIS
PRINCIPAL CONSULTANT/REGIONAL MANAGER – PLANNING
BEnvSc, MEnvMgt

Please note I do not work Mondays

T. 02 6923 1562 **M.** 0413 343 912
E. sarah.h@nghconsulting.com.au
35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

QLD · NSW · ACT · VIC
WWW.NGHCONSULTING.COM.AU



NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

From: Tim Mahoney <Tim.Mahoney@transport.nsw.gov.au>
Sent: Friday, 23 September 2022 10:08 AM
To: Sarah Hillis <sarah.h@nghconsulting.com.au>
Subject: RE: 22-319 - Blind Creek Solar Farm Response to Submission - TfNSW response

Good Morning Sarah,

I've read through your draft response and also discussed a few of the points with my team leader. TfNSW notes the following regarding your draft response:

- NGH Consulting will be providing amended plans to address point 1 and 2 in your below table.
- NGH Consulting currently doesn't have all the requested information regarding the use of B-Double and oversize or over mass (OSOM) vehicles. Notwithstanding the future permit processes you have mentioned, TfNSW requires this information in order to properly assess and mitigate any impacts on the safe and efficient operation of the state road network and prior to finalising the application.

As you're preparing for the final lodgement in response to the submissions and you wish to do so ASAP I understand the information to address the points in TfNSW letter regarding B-Double Vehicles, OSOM and Strategic Design may

not be included. This will effect TfNSW ability to complete a full and thorough assessment and will likely be requested again when the Department of Planning and Environment refers the application for comment.

If you have any questions please contact me on (02) 9549 9966 or via email.

Kind Regards,
Tim

From: Sarah Hillis <sarah.h@nghconsulting.com.au>
Sent: Friday, 23 September 2022 8:46 AM
To: Development South <development.south@transport.nsw.gov.au>; Tim Mahoney <Tim.Mahoney@transport.nsw.gov.au>
Subject: RE: 22-319 - Blind Creek Solar Farm Response to Submission - TfNSW response

Some people who received this message don't often get email from sarah.h@nghconsulting.com.au. [Learn why this is important](#)

CAUTION: This email is sent from an external source. Do not click any links or open attachments unless you recognise the sender and know the content is safe.

Good morning Tim

Sorry to bother, but have you had the opportunity to review the draft response?

Kind regards,

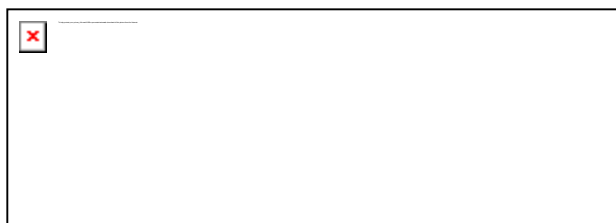
Sarah

SARAH HILLIS
PRINCIPAL CONSULTANT/REGIONAL MANAGER – PLANNING
BEnvSc, MEnvMgt

Please note I do not work Mondays

T. 02 6923 1562 **M.** 0413 343 912
E. sarah.h@nghconsulting.com.au
35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

QLD · NSW · ACT · VIC
WWW.NGHCONSULTING.COM.AU



NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

From: Sarah Hillis
Sent: Wednesday, 14 September 2022 4:02 PM
To: development.south@transport.nsw.gov.au; Tim.Mahoney@transport.nsw.gov.au
Subject: 22-319 - Blind Creek Solar Farm Response to Submission - TfNSW response

Good afternoon Tim

NGH are preparing for the final lodgement of the Response to Submissions for the Blind Creek Solar Farm project.

DPE have requested that we seek your input into the responses to the TfNSW Submission prior to formal lodgement and public display.

As such, please see our draft response below and attached.

We are hoping to formally lodge early next week, so were hoping for a quick turn-around. Please let me know if a response by Friday is achievable, so we can update DPE on the expected turn around.

Kindest regards,

Sarah

Transport for NSW (TfNSW)		
Road upgrades	The length of the BAR treatment should be extended to comply with Figure A 28 of Austroads Guide to Road Design Part 4. The length for the turning path (X) should be added and the tapers should be designed for a design speed of 110kph.	<p>It is understood that detailed design drawings are to be prepared for the existing proposed upgrades to the intersection of the site access and Tarago Road. The plan has been updated according to Figure A 28 of Austroads Guide to Road Design Part 4. The updated intersection design has been completed by PHL surveyors and included in Appendix E.</p> <p>The proposed intersection upgrades are entirely within the historically disturbed road footprint. The Applicant has drafted a discussion paper on the historical disturbance of the intersection which will be provided as an attachment to the Amendment Report.</p> <p>In addition, consultation with the Registered Aboriginal Parties (RAPs) has commenced to notify them of future potential works.</p>
Road upgrades	The table drains on both sides of Tarago Road will have to be reinstated. Cross sections will be required to confirm the roadworks can be contained within the road reserve.	Refer to the cross sections of the design (Appendix E).
Road upgrades	TfNSW notes only the section shown in Attachment 3 is approved as a B-double route but the intention is to use B-doubles during construction and deliveries. Clarification is required as to how the applicant intends to utilise B-doubles noting the above.	The use of sections of road that are not rated to accommodate B-Doubles is typically subject to specific permit application process that occurs following approval of the planning permit. As such, it is understood that this matter will be addressed prior to construction as part of the permit process.
Oversized and B-Double vehicles:	Insufficient details have been provided on the use of oversize or overmass (OSOM) and B-Double vehicles during the construction stage (e.g. for transformers, substations, etc). Details are required on any B-Double and OSOM movements associated with the proposal as well as details on the route these vehicles will take and any changes to the road network required to cater for B-Double and OSOM movements (e.g. removal of infrastructure, widening works, vegetation removal, etc). For example the required works (if any) for B-Double and OSOM vehicles to travel to the site through the intersection of Braidwood Road and Wallace Street and also if travelling via Bungendore Road.	<p>Two OSOM vehicles will be required to deliver two transformers. The vehicles will be subject to road permits issued by the National Heavy Vehicle Regulator (NVHR) that will be applied for by the contractor once the dimensions of the load and the specific delivery vehicle are known. As this information is unknown at this early stage, a detailed assessment of the route is unable to be provided.</p> <p>B-doubles would use the route as detailed within the TIA. Prior to construction and any movement of vehicles, the EPC Contractor will be required to complete a Heavy Vehicle Access Study (HVAS) which will detail if any additional road works (such as removal of infrastructure, widening works, vegetation removal etc.) will be required. This has been detailed as a new mitigation measure AT6.</p>

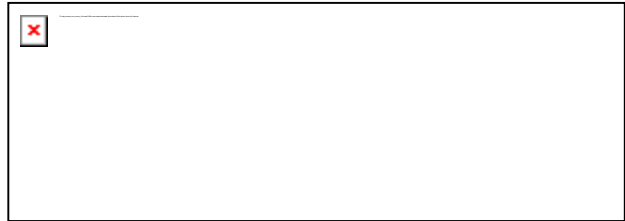
Strategic/Concept Design:	Should it be identified that mitigation measures are required that will impact a state/classified road then a concept design for the proposed works will need to be prepared and submitted as part of the State Significant Development(SSD) assessment process/before SSD determination.	Given the above comments, the assessment of the B-Double and OSOM vehicle route is proposed to be undertaken prior to construction once more information is known, which is the standard approach taken for solar farm projects. Any road upgrades will be assessed as part of these permits through the HVAS.
----------------------------------	---	--

SARAH HILLIS
PRINCIPAL CONSULTANT/REGIONAL MANAGER – PLANNING
BEnvSc, MEnvMgt

Please note I do not work Mondays

T. 02 6923 1562 M. 0413 343 912
E. sarah.h@nghconsulting.com.au
35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

QLD · NSW · ACT · VIC
WWW.NGHCONSULTING.COM.AU



NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.

This email is intended only for the addressee and may contain confidential information. If you receive this email in error please delete it and any attachments and notify the sender immediately by reply email. Transport for NSW takes all care to ensure that attachments are free from viruses or other defects. Transport for NSW assume no liability for any loss, damage or other consequences which may arise from opening or using an attachment.

 **Consider the environment. Please don't print this e-mail unless really necessary.**

OFFICIAL

OFFICIAL

This email is intended only for the addressee and may contain confidential information. If you receive this email in error please delete it and any attachments and notify the sender immediately by reply email. Transport for NSW takes all care to ensure that attachments are free from viruses or other defects. Transport for NSW assume no liability for any loss, damage or other consequences which may arise from opening or using an attachment.

 **Consider the environment. Please don't print this e-mail unless really necessary.**

OFFICIAL

This email is intended only for the addressee and may contain confidential information. If you receive this email in error please delete it and any attachments and notify the sender immediately by reply email. Transport for NSW takes all care to ensure that attachments are free from viruses or other defects. Transport for NSW assume no liability for any loss, damage or other consequences which may arise from opening or using an attachment.

 **Consider the environment. Please don't print this e-mail unless really necessary.**

OFFICIAL