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SSD 8895

Ms Tatsiana Bandaruk
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Department of Planning & Environment
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Dear Tatsiana

Wellington North Solar Farm - EIS Exhibition

I refer to your email dated 14 August 2018 seeking comments from the Office of Environment and Heritage (OEH) on the Environmental Impact Statement (EIS) for the proposed Wellington North Solar Farm Project.

OEH understands that the proposal involves the construction, operation and decommissioning of a 300 megawatt solar photovoltaic plant and development of associated infrastructure, including grid connection. Two options are presented for the grid connection.

OEH has reviewed the Biodiversity Development Assessment Report (BDAR) and notes that:

- two potential routes for the transmission line are presented. The BDAR does not provide any discussion regarding the potential to further avoid impact to Box Gum Woodland by exploring the potential for the western route to be underground
- the required minimum number of plots and transects required per zone area were not completed for all vegetation zone areas
- koala was regarded as not present on the site. Koalas are known to occur in low densities in the general study area.

The Aboriginal Cultural Heritage (ACH) assessment has adequately investigated and reported on the Aboriginal cultural heritage values for the proposed Wellington North Solar Farm. OEH supports the ACH assessment findings and proposed recommendations to avoid and mitigate harm to Aboriginal objects.

Detailed comments and recommendations are provided in **Attachment A**.

Should you require further information regarding issues that are the responsibility of the OEH please contact David Geering on 02 6883 5335 or david.geering@environment.nsw.gov.au.

Yours sincerely

PETER CHRISTIE

**Director, North West
Conservation and Regional Delivery**

11 September 2018

Contact officer: DAVID GEERING
6883 5335

Attachment A

OEH review of Wellington North Solar Farm EIS

1 Aboriginal cultural heritage

Summary of OEH Findings

The assessment identified and analysed 37 sites, the majority of which (28) are isolated stone artefacts. The remaining 9 sites consist of scatters of stone artefacts in very low numbers except for one site that consists of 44 stone artefacts but which are scattered over an extensive area. All sites described are in areas with intense land use disturbance history. A total of 99 stone artefacts were found across the proposed development project and subsequently analysed in the field. The information derived from the analysis presents confirmation of known patterns of Aboriginal subsistence and intermittent occupation. The archaeological finds offer limited research potential beyond what is commonly known. OEH further note that the assessment concludes that there is negligible potential for the presence of intact subsurface objects and therefore no justification for additional investigation using test excavation methods.

Aboriginal consultation

The Aboriginal consultation undertaken to augment the ACH assessment has complied with the procedures set down in the project SEARs. OEH support the documented request of the Registered Aboriginal Parties (RAPs) that the Aboriginal objects discovered during the field survey phases of the assessment will be collected prior to construction and placed in a safe location within the project boundary. OEH acknowledge that the proponent will submit information of the location to the OEH Aboriginal Heritage Information Management System (AHIMS). OEH understand that the Aboriginal cultural significance of the objects was based on a generalised concept that all Aboriginal objects are culturally important and that only the community can determine cultural significance. OEH also note the comments raised by the Wellington Valley Wiradjuri Aboriginal Corporation (WVWAC) on the proposed survey method and acknowledge the written response from the heritage consultant NGH (letter dated 6th February 2018).

Proposed transmission line

OEH notes that the ACH assessment for the proposed connection of the solar farm to the existing TransGrid 330 kV substation (proposed eastern segment) was constrained by access issues. OEH also notes the commitment that further investigation will occur once the final easement is selected and access provided. Overall, the ACH assessment indicates that there is likely to be no major impacts to significant Aboriginal objects within the power line easements being considered based on, the known Aboriginal objects of low archaeological significance across the development project area.

Aboriginal scarred trees

The ACH assessment report discusses the recent recording by the Wellington Valley Wiradjuri Aboriginal Corporation (WVWAC) of four scarred trees, described as canoe trees. They are reported to be outside of the project boundary but close enough to it to be of concern to the WVWAC. The ACH assessment report indicates that efforts will be made to ensure no harm occurs to the trees during the construction phases of the solar farm and associated infrastructure. In addition, the ACH assessment recorded 2 possible scarred trees and 1 possible European surveyor tree within the project boundary. Avoidance strategies are recommended to protect the trees during construction.

2 Clarification of the preferred transmission line route

The Biodiversity Development Assessment Report (BDAR) provides two options for the proposed connection of the solar farm to the existing TransGrid 330 kV substation, stating that these are being investigated and one would be selected. The western option will be either overhead or underground with a 60m easement while the eastern option will be overhead within the solar farm site with a 60m easement and then underground with a 15m easement.

The BDAR does not discuss the potential for the western option to have a 15m easement should the underground option be employed. This may reduce the overall impact of the development through the potential avoidance of Box Gum Woodland EEC along the western transmission line route.

Recommendation

2.1 OEH recommends that further avoidance of Box Gum Woodland be investigated when considering the final transmission line route through exploring the potential for the western route to be underground.

3 The required minimum number of plots and transects required per zone area surveyed

Table 3.3 of the BDAR details the size of each vegetation zone in the study area and the number of plots sampled. The number of plots required under the Biodiversity Assessment Method (BAM) is provided in Table 4 of the BAM. OEH notes that fewer than the required number of plots were sampled in Zones 4, 7, 12 and 13. This was also the case in Zones 6, 8 and 9, although impact in these zones have been avoided, as well as Zones 10 and 11. Vegetation in these last two zones are either exotic or planted non-local vegetation and do not require assessment.

Plot data is required to determine the vegetation integrity scores. Failure to complete the required number of plots is a failure to comply with the BAM.

Recommendation

3.1 The minimum number of plots for each vegetation zone for which impact is planned must be sampled.

4 A Koala population occurs in the area and additional surveys are required

The BDAR indicates that surveys for nocturnal mammals, including the Koala, entailed vehicle-based and foot spotlighting surveys over two evenings. These surveys detected no threatened mammal species and a conclusion was made that Koalas do not occur on the study area.

BioNet indicates that there are Koala records in the general Wellington/Bodangora area although they are likely to occur in low densities. The patches of remnant vegetation on site are dominated by two Koala feed trees, White Box and Yellow Box. It is therefore possible that Koalas may utilise the Solar Farm site.

Recommendation

4.1 Additional targeted surveys for Koalas, including surveys for scratches and scats, should be undertaken to confirm presence or absence on the site.