



Our Ref: DOC20/271742
Your Ref: SSD 9438 RTS

Planning and Assessment Group
Locked Bag 5022
Parramatta NSW 2124

Attention: Mr Javier Canon

Dear Mr Canon

RE: Bonshaw Solar Farm RTS Comments (SSD 9438)

Thank you for your request dated 30 March 2020 seeking comments from the Biodiversity and Conservation Division (BCD) of the Environment, Energy and Science Group in the Department of Planning, Industry and Environment on the Response to Submissions for the Bonshaw Solar Farm. I appreciate the opportunity to provide input.

The BCD was formerly part of the Office of Environment and Heritage, but now forms part of a Group that has responsibilities relating to biodiversity (including threatened species and ecological communities, or their habitats), Aboriginal cultural heritage, National Parks and Wildlife Service estate, climate change, sustainability, flooding, coastal and estuary matters.

We have reviewed the documents supplied and advise that there several issues in relation Aboriginal cultural heritage and biodiversity matters. These issues are discussed in detail in **Attachment 1** to this letter.

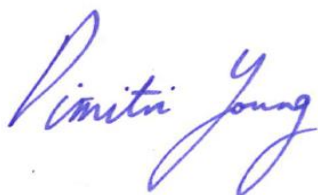
In summary, the BCD recommends that:

1. Further information is required to address our previous recommendations relating to the chance finds protocol and locating the registered AHIMS site.
2. The BDAR needs to include a species polygon and appropriate justification for each species credit species that will be impacted by the proposal.

The BCD requests a further opportunity to review the BDAR once recommendation 2 above has been addressed.

If you have any questions about this advice, please do not hesitate to contact Mr Krister Waern, Senior Operations Officer, at krister.waern@environment.nsw.gov.au or 6640 2503.

Yours sincerely



21 April 2020

DIMITRI YOUNG
Senior Team Leader Planning, North East Branch
Biodiversity and Conservation

Enclosure: Detailed BCD comments – Bonshaw Solar Farm Response to Submissions

Attachment 1: Detailed BCD Comments – Bonshaw Solar Farm Response to Submissions

Aboriginal Cultural Heritage

We have reviewed the updated Aboriginal Cultural Heritage Assessment which comprises Appendix D of the response to submissions document.

We note that most of our previous recommendations have been addressed and that the document largely fulfils our requirements from the perspective of Aboriginal cultural heritage (ACH) management.

However, the chance finds protocol is still open-ended with no closure clause. We recommend that the chance finds protocol is amended to require the Department's endorsement of any collection or salvage regime proposed if the chance finds protocol is triggered.

We also recommend the addition of a final stage requiring the Department's authorisation in writing prior to any work recommencing in an area where works were stopped as a result of chance finds.

Furthermore, no attempt has been made to address our recommendations about the registered site AHIMS #11-3-0083.

As noted in our previous response we consider that the presence of a scar tree along with the detailed anthropogenic and natural landmarks used as identifiers in the original recording of this registered site should make the process of relocation an achievable task.

We still recommend that further attempts be made, using all the information currently available, to relocate this site and assess its current integrity to inform any proposed management measures.

BCD Recommendation:

1. Further information is required to address our previous recommendations relating to the chance finds protocol and locating the registered AHIMS site.

Biodiversity

We have reviewed the revised Biodiversity Development Assessment Report (BDAR) dated 20 March 2020. The BDAR has been updated and has largely addressed our previous comments.

However, we note that there are four species credit species which will be impacted by the proposal. The area of impact and credits required for each species have been determined in the Biodiversity Assessment Method (BAM) calculator. A screen shot from the calculator is shown below for reference.

Species credit classes

Species credit summary

| Species | Area | Credits |
|-----------------------------------------------------------|-------|---------|
| <i>Ninox connivens</i> / Barking Owl | 28.6 | 680 |
| <i>Setirostris eleryi</i> / Bristle-faced Free-tailed Bat | 136.7 | 1180 |
| <i>Tyto novaehollandiae</i> / Masked Owl | 28.6 | 680 |
| <i>Vespadelus troughtoni</i> / Eastern Cave Bat | 29.2 | 1030 |

Only one species polygon has been prepared as Figure 5.3 in the BDAR. This figure references the Bristle-faced Free-tailed Bat in the legend and appears to cover the whole site. The species polygons, and the justification for determining the extent of the polygons, for the other three species have not been provided in the BDAR. The species polygons must be mapped in accordance with the BAM.

BCD Recommendation:

2. The BDAR must include a species polygon and appropriate justification for each species credit species that will be impacted by the proposal.