



Our ref: DOC19/808042

Senders ref:

Mr Rob Beckett
Environmental Assessment Officer
Resources Assessments
Department of Planning, Industry and
Environment
rob.beckett@planning.nsw.gov.au

Dear Rob

Subject: Wellington North Solar Farm (SSD-8895) – Response to Submissions and revised BDAR

I refer to your request of 9 September 2019 for comment from the Biodiversity and Conservation Division (BCD) in relation to the Wellington North Solar Farm Response to Submissions and amended BDAR.

BCD notes that the proponent has confirmed the route for the transmission line since the submission of the EIS, which originally presented two grid connection options. The Biodiversity Development Assessment Report (BDAR) has been updated to reflect the proposed eastern transmission line footprint.

BCD has reviewed the Submissions report and notes that additional surveys have been completed for Koala. BCD further notes that the required minimum number of vegetation integrity plots have not been completed for two vegetation zones.

BCD has also reviewed the amended BDAR and notes that six species credit species were unable to be surveyed during the appropriate survey times. The proponent has therefore assumed these to be present within suitable habitat within the transmission line easement and generated credits within the BAM Calculator.

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

If you have any questions about this advice, please do not hesitate to contact David Geering, Senior Conservation Planning officer, via david.geering@environment.nsw.gov.au or 02 6883 5335.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Christie'.

Peter Christie
Director
North West, Biodiversity and Conservation

23 September 2019

Attachment A

BCD review of Wellington North Solar Farm EIS

1 Aboriginal cultural heritage

As advised in OEH response dated 11 September 2018 regarding the EIS, the Aboriginal Cultural Heritage assessment had adequately investigated and reported on the Aboriginal cultural heritage values for the proposed project; noting that the transmission line route was yet to be confirmed, and that further investigation would occur once the easement was selected and site access granted.

BCD has reviewed the draft addendum Aboriginal Cultural Heritage Assessment (ACHA) provided in the Response to Submissions relating to the selected eastern transmission line. The assessment results for the transmission line identified 2 isolated stone artefacts which are reported to be of low scientific significance, and the Registered Aboriginal Parties (RAPs) have determined the cultural importance of the artefacts as generally low. The RAPs have requested that the artefacts be relocated within the project boundary if the final location of the development footprint impacts on the location where the artefacts are situated (NGH 2019:45-6).

BCD note that the draft assessment report is still in circulation for comment among the RAPs as noted in section 2.1 of the addendum ACHA report. Therefore, BCD request that any issues raised by the RAPs are made available to BCD and an opportunity to provide further comments if required.

BCD has not identified issues with the ACH assessment and consultation undertaken for the proposed transmission line. The recommendation to avoid the two Aboriginal objects in the first instance and if this is not possible, relocate them close by to another location within easement, is reasonable.

Recommendation

- 1 Any issues raised by the RAPs regarding the draft addendum ACHA relating to the eastern transmission line are made available to BCD for review.

2 The required minimum number of plots required per vegetation zone

The Submissions Report indicates that the number of plots for each vegetation zone was based on the area of each zone and the minimum number of plots required as specified by the BAM.

Table 3-3 of the amended BDAR details the size of each vegetation zone and the number of plots. Vegetation zones 4 and 6 had two vegetation integrity plots. Vegetation zone 4 is 6.2 ha in size while vegetation zone 6 is 6.6 ha. Table 4 of the BAM indicates that the minimum number of plots required for vegetation zones >5 to 20 hectares in size is 3.

All other vegetation zones where impact is occurring have been surveyed in accordance with the BAM.

Recommendation

- 2 The minimum number of plots for each vegetation zone for which impact is planned must be sampled in accordance with the BAM.

3 Surveys are required for Koala

BCD notes that additional surveys for Koalas were conducted in October 2018 and surveys on the transmission line easement in January 2019.

4 Species credit species assumed to be present

Six species credit species were unable to be surveyed during the appropriate survey times in the transmission line easement. These species (Pink-tailed Legless Lizard, Glossy Black Cockatoo, Little Eagle, Superb Parrot, Masked Owl and Barking Owl) have therefore been assumed to be present within suitable habitat within the transmission line easement and generate credits within the BAM Calculator. These species were surveyed for within the array development footprint and determined not to be present.

It should be noted that the five bird species are dual species credit species and that species credits only apply if breeding habitat constraints are present. The following consideration should be made in regards this development:

- Superb Parrot – The Wellington area is well outside the known breeding range for this species. Species credits do not apply.
- Little Eagle – Habitat exists for this species along the transmission line however if large stick nests are not present this will be sufficient to justify removal of this species as a species credit species. As trees along the transmission line route were inspected for hollows it would be expected that the presence of a large stick nest would have been noted.

Recommendation

- 3 Consideration be given as to whether removal of some identified species credit species identified in the BDAR can be justified.