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URBIS

MORVEN SOLAR FARM

Scoping Report – Request for
SEARs

Prepared for
ELGIN
October 2024

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GLOSSARY AND ABBREVIATIONS

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
AHD	Australian Height Datum
AMEO	Australia Energy Market Operator
BAM	Biodiversity Assessment Method
BC Act	<i>Biodiversity Conservation Act 2016</i>
BC Reg	<i>Biodiversity Conservation Regulation 2017</i>
BDAR	Biodiversity Development Assessment Report
BESS	Battery Energy Storage System
BSAL	Biophysical Strategic Agricultural Land
CEEC	Critically Endangered Ecological Community
CEMP	Construction Environmental Management Plan
CTMP	Construction Traffic Environmental Plan
DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water
DCP	Development Control Plan
DPHI	Department of Planning, Housing and Infrastructure
DPI	Department of Primary Industries
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>

Reference	Description
EIS	Environmental Impact Statement
EMF	Electromagnetic Field
EPA	NSW Environment Protection Authority
FM Act	<i>Fisheries Management Act 1994</i>
GLEP	Greater Hume Local Environmental Plan 2012
LEP	Local Environmental Plan
LGA	Local Government Area
LSC	Land and Soil Capability
LSPS	Local Strategic Planning Statement
MNES	Matters of National Environmental Significance
NSW	New South Wales
PCT	Plant Community Type
PCU	Power Conversion Units
PHA	Preliminary Hazard Analysis
PV	Photovoltaic modules
REZ	Renewable Energy Zone
SEPP	State Environmental Planning Policy
Site	Lot 51 DP753751 Lot 48 DP753751 Lot 194 DP723765 Lot 38 DP753751 Lot 195 823292
SSD	State Significant Development
SSDA	State Significant Development Application
TEC	Threatened Ecological Community
TfNSW	Transport for New South Wales
TIA	Traffic Impact Assessment
VPA	Voluntary Planning Agreement

1. INTRODUCTION

This Scoping Report has been prepared on behalf of Elgin Energy Pty Ltd (**Elgin**) (the **Applicant**) in support of the proposed Morven Solar Farm (the **Project**). The Project's site address is known as 1258 Coach Road, Culcairn, which is approximately 11km north of Gerogery, and is located in the Greater Hume Council LGA. The site has an area of approximately 220 hectares (**ha**) and is zoned RU1 – Primary Production Zone under the Greater Hume Local Environmental Plan 2012 (**GLEP**).

This report seeks Secretary's Environmental Assessment Requirements (**SEARs**) for the preparation of an Environmental Impact Statement (**EIS**) that will accompany a State significant development application (**SSDA**).

This report provides an overview of the proposed development and the relevant planning framework that applies to enable the issue of SEARs, which will guide the preparation of the EIS for the Project. The Scoping Report should be read in conjunction with the Scoping Summary Table provided in **Appendix A**.

This section of the report identifies the applicant for the project and describes the site and proposed development. It outlines the site history and feasible alternatives explored in the development of the proposed concept, including key strategies to avoid or minimise potential impacts.

1.1. APPLICANT DETAILS

The Applicant details for the proposed development are listed in the following table.

Table 1 Applicant Details

Descriptor	Applicant Details
Full Name(s)	Elgin Energy Pty Ltd
Postal Address	Level 3, 50 Bridge Street, Sydney NSW 2000
ABN	95 629 627 416
Nominated Contact	Ciara Deering
Contact Details	0419 962 436

Founded in 2009, Elgin is a leading international solar and renewable energy storage company, with offices in Sydney, London, Dublin, and Munich. Elgin's specialist teams manage each phase of renewable energy projects from origination through development and operation. Since being established, the Elgin team has grown from the four founders to over 100 employees.

Elgin is currently operating across four markets: Australia, Ireland, the United Kingdom, and Germany with a pipeline of over 150 solar and storage projects, which will provide over 15 GW of clean, renewable energy. This is enough green energy to power over 11 million homes.

Elgin has an unparalleled 98% success rate in securing planning permission and over 2 GW of development approvals across its three key markets. Every project developed to date has been energised or has a clear schedule for delivery.

Elgin's vision is to become the leading solar company, powering the world to a sustainable future and create a positive impact that will benefit future generations. At the heart of Elgin's values are care, integrity, excellence, and agility, which join to ensure a best-practice approach to planning and development in all of their projects.

1.2. PROJECT DESCRIPTION

Morven Solar Farm will have capacity to generate approximately 125 megawatts (MW) and will connect into the national electricity grid via the 132kV Transgrid line that traverses north-south through the centre of the site providing high accessibility to the grid. The Project will include an on-site 125 MW/500MWh BESS, a 33/132kV substation, the construction of solar arrays, inverters and ancillary infrastructure, internal access roads, and a switch yard.

The Project will be subject to detailed assessment and design refinement during the preparation of the EIS. Further detail on the considerations of the design flexibility is provided in Section 3.1.1.

The objectives of the Project are described as follows:

- Contribute to NSW's transition towards renewable energy generation that will reduce the reliance on fossil fuels.
- Utilise existing and available capacity in the grid for new renewable energy generation to meet current need for clean energy as fossil fuel power generation is scaled down in the National Energy Market.
- To assist decarbonising the country and become an active part of the green transition.
- Be responsive to the site's physical and environmental constraints.
- Adopt measures to maintain and regenerate the site's historically agricultural land use.
- To provide the community with positive social infrastructure that benefits future generations and assures social licence to operate over the life-span of the project.

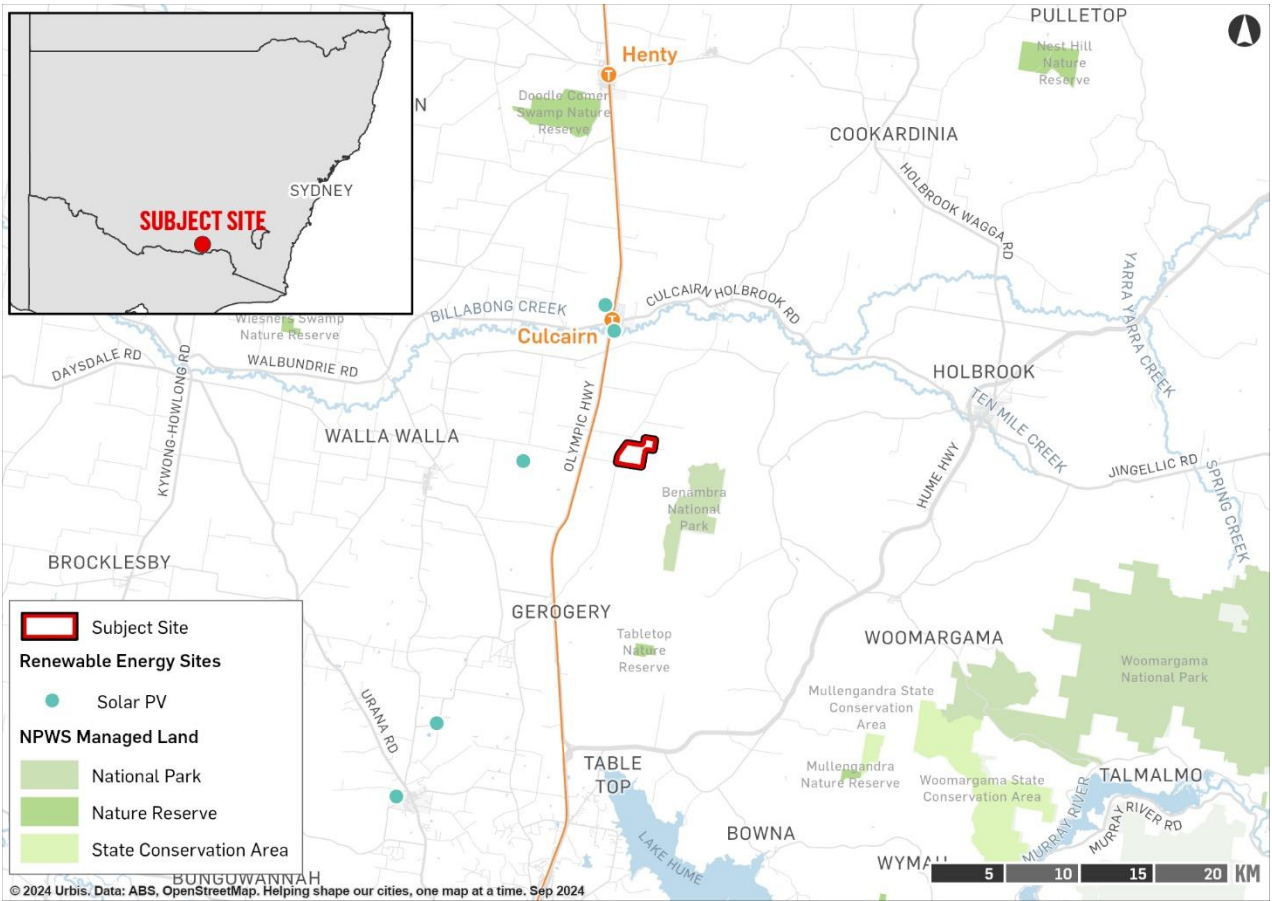
The Project land use is categorised as *electricity generating works* and is permitted with consent in the RU1 zone. The proposed development has an estimated capital investment value greater than \$30 million. Accordingly, the proposal is classified as SSD under Section 20 of the *State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)*.

The Minister for Planning is the consent authority for the proposal in accordance with section 4.5 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*. Accordingly, this application will be lodged with DPHI as an SSDA seeking development consent for the proposed development.

A detailed description of the key features of the site and locality is provided in **Section 2.2** of this report.

The location of the site in its regional setting is provided in Figure 1 and an aerial photograph of the site is provided in Figure 2 below.

Figure 1 Regional Context



Source: Urbis

Figure 2 Aerial Image of the Site



Source: Urbis, 2024

1.3. PROJECT BACKGROUND

1.3.1. Site History

The site is undeveloped and has historically been used for grazing and associated rural activities. To determine the optimal site location, several landholdings were assessed along the 132kV line from Albury to Wagga Wagga. The Project location has been selected due to its relatively unconstrained nature and its immediate proximity to existing transmission grid infrastructure with available capacity.

During the site selection process, the land parcels to the north and west of the final Project layout were included in an initial site boundary assessment. The Project site boundary was reduced to its current layout to minimise exposure to sensitive receivers and fewer environmental constraints.

1.3.2. Likely Future Strategies

It is anticipated the following key strategies will be adopted to avoid, minimise or off-set the impacts of the Project to the extent known at the scoping stage:

- Avoidance of impacts on existing significant biodiversity and riparian ecosystems.
- Design elements to minimise visual impacts, including setbacks and landscaping.
- Sheep grazing under the solar arrays to continue current agricultural/ grazing activities. Given low levels of inundation and the successful current grazing practice, grazing is expected to occur during all seasons. Solar panels will be designed to allow space for sheep movement without risk of potential damage to solar panels. An Agricultural Assessment will be prepared to inform the existing land capability, gross agricultural returns, most suitable grazing option (e.g. Merino sheep for wool production, prime or dorper

lamb production), grazing management strategies, and other factors to be considered for a successful implementation of an agri-solar use.

1.3.3. Related development

There are no existing or approved developments that would be constructed or operated in conjunction with the Morven Solar Farm.

2. STRATEGIC CONTEXT

This section describes the way in which the Project addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the Project which will be explored in further detail within the future EIS.

2.1. PROJECT JUSTIFICATION

The Project would improve the reliability and security of the State and National electricity network by generating electricity from renewable sources and feeding into the grid for its national transmission.

The Project would support energy generation and storage development in NSW and Australia by increasing flexibility and resilience of the electrical grid as overall renewable energy generation increases and non-renewable energy generation decreases over time. The Project would generate approximately 270,000 MWh of renewable energy, enough to supply approximately 48,000 homes (AER, 2023) and reduce carbon emissions by approximately 220,000 tonnes of carbon dioxide equivalent (**CO₂-e**).

The proposed development is aligned with the Commonwealth, State, Regional, and Local strategic plans and policies applying to the site as outlined below.

2.1.1. Commonwealth Commitments

The Renewable Energy Target is an Australian Government Scheme designed to incentivise investment and encourage renewable energy generation. The scheme has a target to provide an additional 33,000 gigawatt hours (**GWh**) each year until the scheme ends in 2030.

The Project would contribute towards achieving the target and providing an alternative power generation at a time when fossil fuel generation is being phased out from the grid. This will also aid Australia in meeting the Paris Agreement commitments and targets, contributing toward the global green energy transition.

2.1.2. State Commitments

2.1.2.1. NSW Transmission Infrastructure Strategy

Released in 2018, the NSW Transmission Infrastructure Strategy outlines how the State government will prioritise REZs while bringing forward large-scale network upgrades. In order to decrease the financial risk for private stakeholders, the NSW Government devised this strategy to encourage investment in the infrastructure needed to support the implementation of renewables in these targeted zones.

The Morven Solar Farm is strategically significant to the development of the renewable energy future of NSW. The location of the Project takes into account the objectives of the Infrastructure Strategy by aligning itself with the strategic merit of the State-wide Strategy. Notwithstanding, the proposed Morven Solar Farm relies on existing infrastructure for connection to the grid and is not dependent on future transmission lines for its feasibility, therefore not requiring additional investment in supporting infrastructure.

2.1.2.2. NSW Electricity Strategy

The NSW Electricity Strategy is the NSW Government's plan for a reliable, affordable, and sustainable electricity future that supports a growing economy. However, success will be hampered from congestion in the transmission system, which could dampen investment in new generation, which is required to reduce electricity prices, improve reliability, and protect the environment through emissions reduction.

The strategy looks at improving the efficiency and competitiveness of the NSW electricity market by reducing risk, cost, and delays in the process, through investing in new technologies.

The renewable energy sector is seeing improving costs of renewables with this type of energy generation being the most economical form of new generation. These factors, combined with coal-fired power stations reaching end of life, provides an opportunity for the government to promote renewables for investment.

The Morven Solar Farm has strong strategic alignment with the NSW Electricity Strategy by utilising existing available capacity in the 132kV transmission line traversing the site, expediting the generation of clean energy into the grid without requiring upgrades to existing transmission infrastructure, or relying on construction of new transmission infrastructure.

2.1.2.3. NSW Electricity Infrastructure Roadmap 2020

The NSW Electricity Infrastructure Roadmap outlines the NSW government's two-decade plan to transition the State's energy system into a clean, cheap, and reliable system. A target identified in the roadmap is to replace coal-fired stations with renewables, aiming to close the fossil fuel systems by 2035.

The roadmap will support the private sector to deliver 12 gigawatts of new renewable electricity generation and 2 gigawatts of long-duration storage at a minimum.

The roadmap identifies the creation of merit assessment criteria as part of project selection which is assessed by the Consumer Trustee. This ensures there is a State and community benefit delivered by the proposed projects. The merit assessment criteria includes:

- Commitments to improve local employment opportunities.
- Compatibility and complementary with existing agricultural land uses.
- Local community engagement and support for projects.

The roadmap includes the creation of REZ. Whilst the Morven Solar Farm is located outside of declared REZs, the Project supports the transition of the State toward Net Zero and therefore, the project has strategic merit.

2.1.2.4. NSW Climate Change Act (Net Zero Future) 2023

The *Climate Change Act (Net Zero Future) 2023*, is a recent but central piece of legislation that solidifies and enshrines NSW Net Zero targets and commitment. The Act aligns with the Paris Agreement and states clear aims for the State moving forward.

The Act states the emission reduction targets are 50% reduction on 2005 levels by 2030 and a 70% reduction by 2035, leading to Net Zero by 2050.

The proposed solar farm is consistent with the Act as it helps move toward the goals set by the State Government through the provision of renewable energy infrastructure.

2.1.2.5. AEMO Integrated System Plan 2024

The Integrated Systems Plan is prepared by the AEMO calls for urgent investment in generation, firming and transmission that targets secure, reliable and affordable electricity through the energy transition. The 2024 Integrated Systems Plan builds upon previous Plans with updated targets reviewed by existing actions.

In the 'optimal development path' Wagga Wagga and its surrounds have been identified for actionable development to build upon the committed and anticipated development already underway. This development pathway aligns with the renewed NSW Net Zero Goals.

The proposed Project supports the Integrated System Plan as it creates additional sources of renewable energy along planned and existing transmission lines and pathways to support the State REZs and diversity of electricity sources.

2.1.3. Riverina Murray Regional Plan 2041

Regional strategic plans set out high level goals and objectives for multiple local government areas. These plans inform statutory planning and development through the objectives designed for land use planning. The Riverina Murray Regional Plan 2041 is relevant to the Morven Solar Farm. The Plan focuses on environmental preservation as the region is considered 'Australia's food bowl' but also considers the growing and diverse community and the economic prosperity of the region.

Objective 13 in the Plan is to "support the transition to net zero by 2050" where it is stated that the region "is in a strong position to contribute to and capitalise on the net zero target and electricity infrastructure plans." In addition to the prospect of renewable energy, this objective considers the role of the circular economy and waste minimalisation in this transition.

The Morven Solar Farm is in a position to contribute overall to the objectives of the Riverina Murray Regional Plan 2041 but particularly toward the transition to net zero. Therefore, the project demonstrates strategic merit in line with the regional plan.

2.1.4. Greater Hume Council Local Strategic Planning Statement

The Greater Hume LSPS sets the 20-year vision for the Greater Hume Local Council's land use and strategic goals. The LSPS operates in conjunction with the Regional and State strategic plans.

The LSPS sets out three themes with nine priorities and subsequent goals that inform the future development of the Greater Hume LGA. The LSPS recognises the Council's strategic importance at both the NSW and National levels and delves into how climate change will affect its ability to operate such as continuing to deliver valuable resources to the community.

Direction 11 of the LSPS is to "promote the diversification of energy supplies through renewable energy generation". The construction of the Morven Solar Farm is consistent with this objective, helping deliver new renewable energy sources.

2.2. KEY FEATURES OF SITE AND SURROUNDS

Table 2 Key Features of Site and Locality

Descriptor	Site Details
Street Address	1258 Coach Road, Culcairn NSW 2660
Legal Description	The Project as shown in Figure 3 is located on land legally described as: Lot 51 DP753751 Lot 48 DP753751 Lot 194 DP723765 Lot 38 DP753751 Lot 195 DP 823292
Site Area	The site has an area of approximately 220.2 ha.
Land Configuration	The site is irregular in shape and runs adjacent to Coach Road, which runs at a north south alignment. The far southeastern portion gives way to a steep ridgeline, while the remainder of the site is relatively flat. There are pockets of lightly vegetated areas across the site. Several water courses traverse the site, with Red Creek running diagonally through the northeastern portion of the site, and a number of farm dams scattered throughout the middle of the site. Refer to Figure 4 and 5 for images of the site.
Land Ownership	Freehold
Existing Development	Current land use consists of sheep grazing and associated agricultural activities.
Local Context	The surrounding locality is described below: North: The town of Culcairn is located approximately 8.5km north of the site, which includes a regional train station and other local services. East: The Benambra National Park sits approximately 4 km to the east of the subject site. South: The village of Gerogery sits approximately 11km south of the subject site. West: Land to the west predominantly consists of undulating farmlands. Approximately 10km west of the site there are two approved solar farms.
Regional Context	The site is located in the Greater Hume Shire LGA, approximately 42km north of the Victorian border. The surrounding area is characterised as rural and contains limited landmarks or built features.

Descriptor	Site Details
Infrastructure	Coach Road abuts the site on its western boundary. A 132kV power line bisects the site in a general north-south orientation through the centre of Lot 51 DP753751 and Lot 48 DP753751.
Site Access	It is proposed that access to the site during construction and operation will be from Coach Road and Jobsons Road.
Easements and Covenants	There is an easement vested in NSW Electricity associated with the power lines traversing the lines.
Acid Sulfate Soils	A desktop review has not revealed the presence of Acid Sulfate Soils on site or surrounding land.
Contamination	No record of notice or list of notified sites has been identified within the site or its surroundings.
Stormwater and Flooding	Council has not undertaken flood studies for this land.
Bushfire Prone Land	The site has a small amount of Category 1 Bushfire Prone Land in the southeastern corner of the site with additional vegetation buffers in the same area. The properties to the south and east of the site contain high and low risk vegetation for Bush Fire Prone Land.
Flora and Fauna	The majority of vegetation found within the site is comprised of exotic planted vegetation for cropping. Most of the native vegetation had been cleared prior to 1990 although some native values still exist on the site. See Section 6.1.5 .
Aboriginal Heritage	An AHIMS search was conducted on the 29 th April 2024. No Aboriginal Sites have been recorded in or near the site and no Aboriginal places have been declared in or near the site.
European Heritage	There are no local or State Heritage listed items within the site or within a 4 km buffer.

Figure 3 Aerial Map of the Site



Source: Urbis, 2024

Figure 4 Site Photographs



Picture 1 View North to South near Red Creek



Picture 2 View South to North from the southeastern corner

Source: *Urbis*

Figure 5 Site Photographs



Picture 3 View south to North from the southwestern corner



Picture 4 View South to North near Red Creek

Source: Urbis

2.3. AGREEMENTS WITH OTHER PARTIES

It is the intent of the Applicant that the future SSDA and EIS will be accompanied by a Voluntary Planning Agreement between the Applicant and Council in support a community benefit sharing offer. Future conversations with Council will be undertaken to refine the details of its execution and agreed conditions to the satisfaction of all parties.

2.4. CUMULATIVE IMPACTS WITH FUTURE PROJECTS

The Project is within the locality of Culcairn. There are two solar projects approved within approximately 10 km of the site and fifteen proposed renewable energy projects within 70km of the site. Most of these projects have been approved and three are under construction.

The potential cumulative impacts of the project will be addressed in the EIS in accordance with the DPHI's *Cumulative Impact Assessment Guidelines for State Significant Projects* (October 2022).

The assessment will include consideration of:

- **Incremental impacts:** involves adding the impacts of the Project to the baseline condition of each relevant matter. The impacts from existing projects (such as nearby renewable energy and other major developments) will be assumed as part of the baseline conditions evaluated and will be considered against any baseline changes as part of each detailed assessment. The extent of their respective study areas, period of time and assessment approach will be informed during the detailed assessment according to each matter.
- **Combined incremental impacts:** involves the combined effect of different impacts of the Project. The combined impacts will be considered as part of each technical evaluation (e.g., increase of noise as part of increased traffic levels from the Project, economic effects derived from the loss of agricultural land or impacts on productivity, if any, etc.).
- **Issue-specific cumulative impacts:** involves consideration of the impacts of the Project together with key matters with other relevant future SSD projects. Existing and approved developments within the catchment area (50km) will be considered within each technical assessment for the visual, noise, traffic, social, hydrology, biodiversity, waste and agriculture components.
- **Combined cumulative impacts:** involves consideration of the total synergised cumulative impacts of the Project with operational, under construction, approved and other relevant projects. Due to the range of uncertainties in the future and the nature of some of these impacts, this level of assessment is qualitative.

The range of uncertainties that affect this section includes:

- The level of detail from future projects, particularly those who have been not approved yet and may modify their footprint, scope and quantities relating to construction and operation.
- The likelihood that those projects will proceed, due to planning, environmental or financial constraints, which are unknown during the finalisation of this EIS. This includes contingency regarding securing connection rights.
- The timing of future projects, not only for approval but for their Final Investment Decisions, construction time, staging and operational life, which could affect the level of overlapping with the Project.
- The uncertainty regarding environmental and social changes, due to climate change impacts and/or demographic and built environment changes.

Approved and likely future developments that may be relevant in the cumulative impact assessment of the proposal are summarised in the following table and map (Table 3; Figure 6).

Table 3 Approved and Likely Future Developments

Number	Name	Capacity (MW)	Distance (km)	Status
1	Walla Walla Solar Farm	300	5	Final Investment Decision/Under Construction
2	Back Henty Road Solar Farm	5	6.9	Approved
3	Culcairn Solar Farm	350	7.5	Final Investment Decision/Under Construction
4	Glenellen Solar Farm	200	20.7	Final Investment Decision/Under Construction
5	Jindera Solar Farm	150	26.0	Approved
6	Hume North BESS	74	35.5	Proposed
7	Wodonga SOL1 Solar Farm	62	40.5	Approved
8	Indigo Solar Farm	4.95	45.4	Approved
9	Holbrook Solar Farm	300	50.4	Proposed
10	Maxwell Downs Solar Farm	104	51.3	Proposed
11	Barnawartha Solar Farm 2	5	52.2	Approved
12	Barnawartha Solar Farm	64	53.7	Approved
13	Uranquinty Solar Farm	5	56.6	Approved
14	Sandy Creek Solar Farm	12	57.7	Approved
15	Gregadoo Solar Farm	65	60.1	Approved
16	Lockhart Microgrid Energy	10	61.6	Approved

Figure 6 Local Context and Cumulative Impacts Map



Source: Urbis, 2024

3. THE PROJECT

This section outlines the key features, including the project area, the conceptual physical layout and design (including likely mitigation measures), the main land use activities and the likely timing for delivery of the project.

3.1. PROJECT OVERVIEW

The key components of the project are listed in the following table. A copy of the proposed development footprint drawings is attached as shown in Figure 7.

Table 4 Project Details

Descriptor	Project Details
Project Site Area	The project site has an area of approximately 220 ha.
Project Description	<p>The Project will comprise the construction of a solar farm with capacity of 125 MW. Key infrastructure components will include:</p> <ul style="list-style-type: none"> ▪ Ground mounted PV modules. PV modules would be mounted on single axis tracking systems with an assumed maximum height up to 3.5 metres above ground. ▪ A series of PCU would be arranged at the end of each PV array across the Site, with underground cabling connecting each PCU to the on-site substation. ▪ An on-site 33/132 kV substation connected to the solar farm for connection to the distribution network via the existing TransGrid overhead 132 kV powerline. ▪ An on-site 125MW/500MWh BESS. ▪ Temporary and permanent ancillary infrastructure such as: <ul style="list-style-type: none"> ▪ Temporary construction facilities including a construction compound, laydown area(s), construction materials storage, and site office buildings and amenities. Permanent supporting infrastructure including internal access tracks, security fencing and lighting, operations and maintenance buildings, and operational vehicle access points. ▪ Additional ancillary infrastructure such as perimeter fencing, landscaping, and perimeter treatments (including bushfire asset protection zones).
Estimated Development Cost	Approximately \$400 million AUD (excluding GST).
Development Footprint	Approximately 163 ha.
Indicative Height and Infrastructure	<ul style="list-style-type: none"> ▪ Solar panels average height would be approximately 3.5 metres. ▪ BESS container height would be approximately 3 metres. ▪ The highest components of the substation would be approximately 7 metres.

Descriptor	Project Details
Indicative materials transported to site	<ul style="list-style-type: none"> ▪ Transport vehicles will transport solar panels, batteries, inverters, substation components, step-up transformers, steel, road construction materials, concreting supplies and water to the site. ▪ Oversized Transport vehicles and B-doubles will transport large plant materials such as battery packs and transformers to the site. ▪ Medium and Heavy Rigid Trucks will transport raw materials and smaller plant materials to the site, as well as conduct waste collection and foundation laying.
Indicative Construction Period	<p>Subject to the detailed assessment and approval process, it is anticipated that the project construction will start in mid-2027. It is expected that the project would be constructed over a period of approximately 12-18 months with a peak of 4 months.</p> <p>Construction hours would likely be limited to:</p> <ul style="list-style-type: none"> ▪ 7am to 6pm Monday to Friday. ▪ 8am to 3pm Saturday. ▪ No work on Sunday or public holidays. <p>The delivery of materials requiring an escort and/or emergency works may occur outside of the above construction hours.</p>
Indicative Construction Workforce	Approximately 150 staff on site are likely to be required during the peak construction phase.
Job Staging/Phasing	Currently there are no plans to stage construction of the Project.
Site Access	Access to the site would be through Coach Road and Jobson Road.
Indicative Operational Workforce	Approximately 1-3 staff on site are likely to be required during the operational phase.
Project lifecycle	Following the expected operational lifespan of 50 years, the solar farm would either be replaced, refurbished or enhanced with upgraded equipment. Significant upgrades or changes to equipment may be subject to additional assessment and approval requirements.
Decommissioning	<p>Once the project reaches the end of the operational lifecycle, the solar farm would be decommissioned, and all above ground infrastructure would be removed to enable the site to return to its existing land capability.</p> <p>Equipment dismantled and removed from the site would either be repurposed or recycled where possible.</p>

3.1.1. Design considerations during preparation of EIS

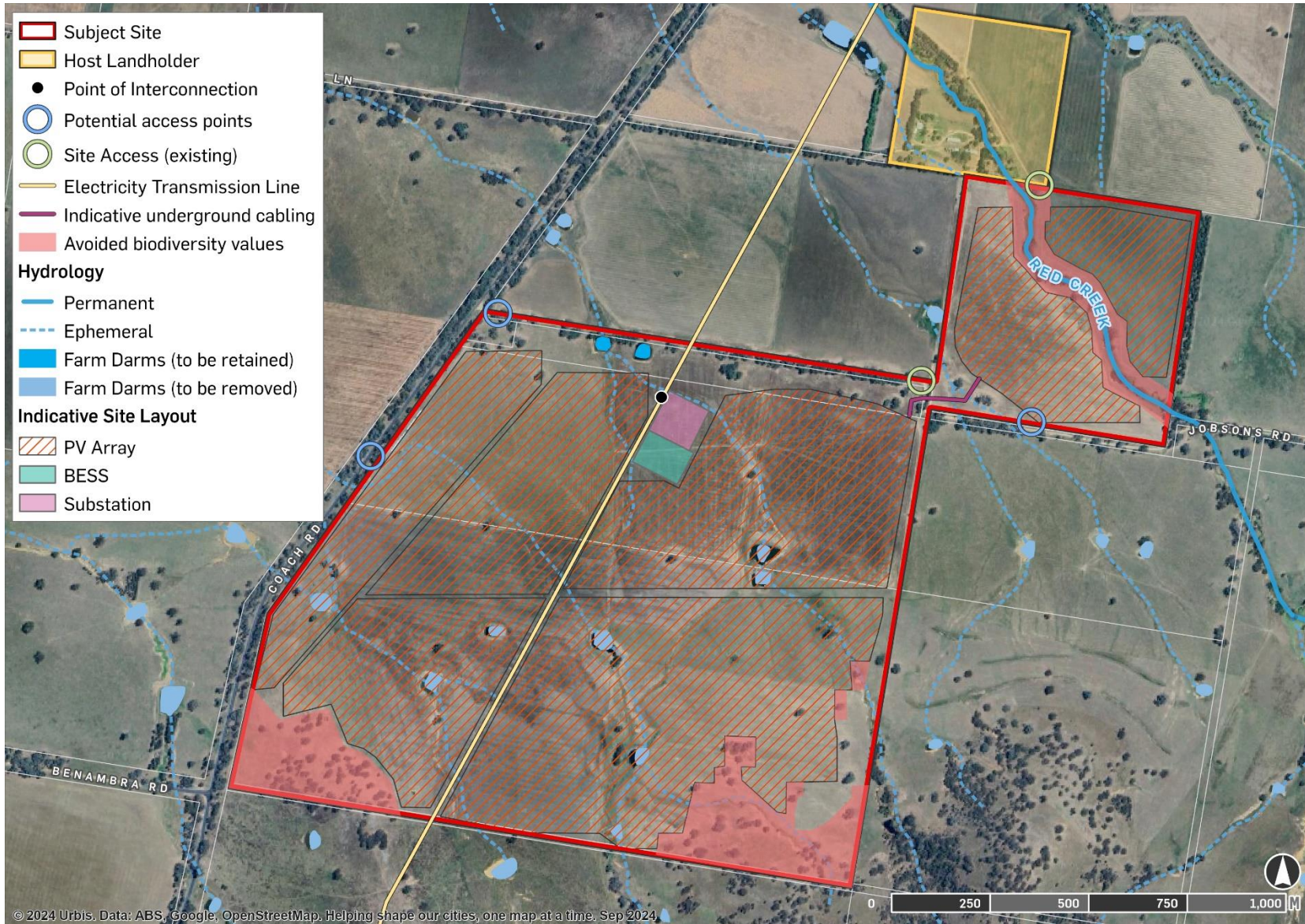
The indicative development footprint and design elements identified in Figure 7 are representative of the intended proposed development. However, the development footprint and design are subject to detailed design in response to assessment during the preparation of the EIS and this may result in some minor refinement.

There are elements of the Project that require some flexibility during the preparation of the EIS as they will require detailed technical assessment and consultation with relevant authorities, including:

- **Location of battery storage and substation along the TransGrid line.**
 - The Applicant is committed to ongoing consultation with TransGrid to determine and required location.
 - The battery storage and substation location when selected will be assessed by all relevant technical inputs.
- **Location of site access points onto Coach Road and Jobsons Lane.**
 - These locations will be assessed and determined using detailed swept path analysis with consideration of all construction and operational vehicle movements.
 - The locations will also be determined by consultation with relevant parties, including the community, Council and relevant authorities.
 - Any potential upgrades of Jobsons Road will be consulted with landowners who rely on access to Jobsons Lane.
- **Potential road upgrades.**
 - Potential road upgrades are under investigation and will be refined with Council and TFNSW during the detailed design in preparation of the EIS.
- **Underground cabling connecting the two portions of the site (South West to North East).**
 - The underground cable crossing Jobsons Lane will be subject to detailed design and consultation with landowners that rely on access to Jobsons Lane.
- **Crossing of Red Creek.**
 - The location of a crossing of Red Creek will be informed by detailed technical assessment, including biodiversity and cultural heritage.

Many of these elements were discussed during the Scoping meeting with DPHI. We accept that SEARs will be issued with requirements to address these technical matters and further consultation.

Figure 7 Indicative Development Footprint



Source: Urbis, 2024

3.2. FEASIBLE ALTERNATIVES

Section 192(c) of the *Environmental Planning and Assessment Regulation 2021* (the Regulation) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the project.

Elgin identified three project alternatives which were considered with respect to the identified need for the renewable energy development. Each of these options is listed and discussed in the following table.

Table 5 Analysis of Feasible Alternatives

Option	Comments
Option 1 – Do Nothing	<p>The 'Do Nothing' option would allow for the continued use of the land for agricultural purposes. However, this would preclude the strategic benefits as outlined in Section 2.1.</p> <p>Considering potential impacts that climate change would have on future land uses, biodiversity, and energy securities, among other effects, it is considered that the benefits of this project outweigh a 'Do Nothing' approach.</p>
Option 2 – Alternate location/ design	<p>Elgin undertakes a detailed site suitability analysis and due diligence assessment to inform the selection of sites. This includes the use of geographic information systems software and multi-criteria assessment to identify sites with high suitability and minimal constraints. Several other sites in near proximity were considered, however were considered unsuitable due to not satisfying criteria including:</p> <ul style="list-style-type: none"> ▪ Topography ▪ Biodiversity density and quality ▪ Flooding ▪ BSAL Land ▪ Land size available ▪ Proximity to existing electricity network with available capacity ▪ Proximity to dwellings and sensitive receivers ▪ Suitable site access. <p>The Project site was selected due to meeting the above criteria and allowing for a balanced approach to managing any identified potential constraints.</p>
Option 3 – Morven Solar Farm (Preferred)	<p>Following the selection of the site for Morven Solar Farm, the alternative development footprints were prepared and refined following a preliminary assessment of native biodiversity and hydrology of the site. The proposed footprint avoids the majority of areas and items of natural value while maintaining an optimal energy output.</p>

4. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, including:

- *Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act 1999*
- *NSW Biodiversity Act 2016*
- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning Assessment Regulation 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *Large-Scale Solar Energy Guidelines 2022*
- *Greater Hume Local Environmental Plan 2012*
- *Greater Hume Development Control Plan 2013.*

The following table categorises and summarises the relevant requirements in accordance with the DPHI guidelines. Each of these matters will be addressed in further detail within the future EIS.

4.1. STATUTORY REQUIREMENTS

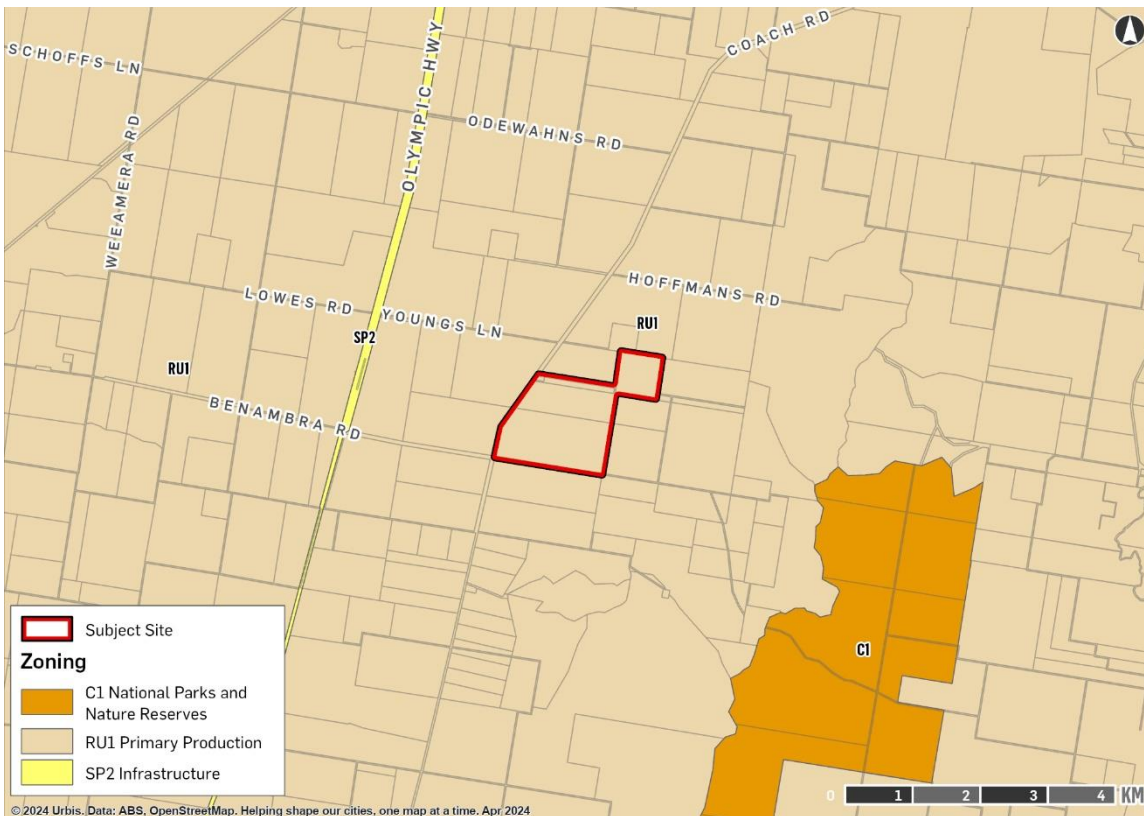
The following table categorises and summarises the relevant requirements in accordance with the DPHI *State Significant Development Guidelines*.

Table 6 Identification of Statutory Requirements for the Project

Statutory Relevance	Action
Power to grant approval	<p>In accordance with Schedule 1, Section 20 of the Planning Systems SEPP, development for 'electricity generating works', are to be considered State significant if the project:</p> <p><i>(20) (a) has an estimated development cost of more than \$30 million, or</i></p> <p><i>(b) has an estimated development cost of more than \$10 million and is located in an environmentally sensitive area.</i></p> <p>The project involves development for the purpose of electricity generating works using solar power and has an estimated cost of over \$30 million. The project is considered State significant development.</p>
Permissibility	<p>The site is zoned RU1 – Primary Production under the GLEP 2012. Electricity generating works are prohibited in the RU1 – Primary Production zone under the GLEP 2012.</p> <p>Notwithstanding, the proposed development satisfies section 2.6(1)(a) of the Planning Systems SEPP as electricity generating works are permitted with consent within any land in prescribed zones under the <i>State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP)</i>. The T&I SEPP states in Part 2.3 Development Controls, Division 4, section 2.35 that:</p>

Statutory Relevance	Action
	<p><i>Electricity generating works means a building or place used for the following purposes -</i></p> <p>(a) <i>Making or generating electricity,</i></p> <p>(b) <i>Electricity storage</i></p> <p>The T&I SEPP, states in section 2.36:</p> <p>(1) <i>Development for the purpose of electricity generating works may be carried out by any person with consent on the following land –</i></p> <p>(a) <i>In the case of electricity generating works comprising a building or place used for the purpose of making or generating electricity using waves, tides, or aquatic thermal as the relevant fuel source-on any land,</i></p> <p>(b) <i>In any other case – any land in a prescribed non-residential zone.</i></p> <p>RU1 is a prescribed rural, non-residential zone. The project is permissible with consent under section 2.36(1) of the T&I SEPP.</p>

Figure 8 Zoning



Source: Urbis, 2024

4.2. OTHER APPROVALS

Table 7 below outlines other approvals required under relevant NSW and Commonwealth legislation that are relevant to the project.

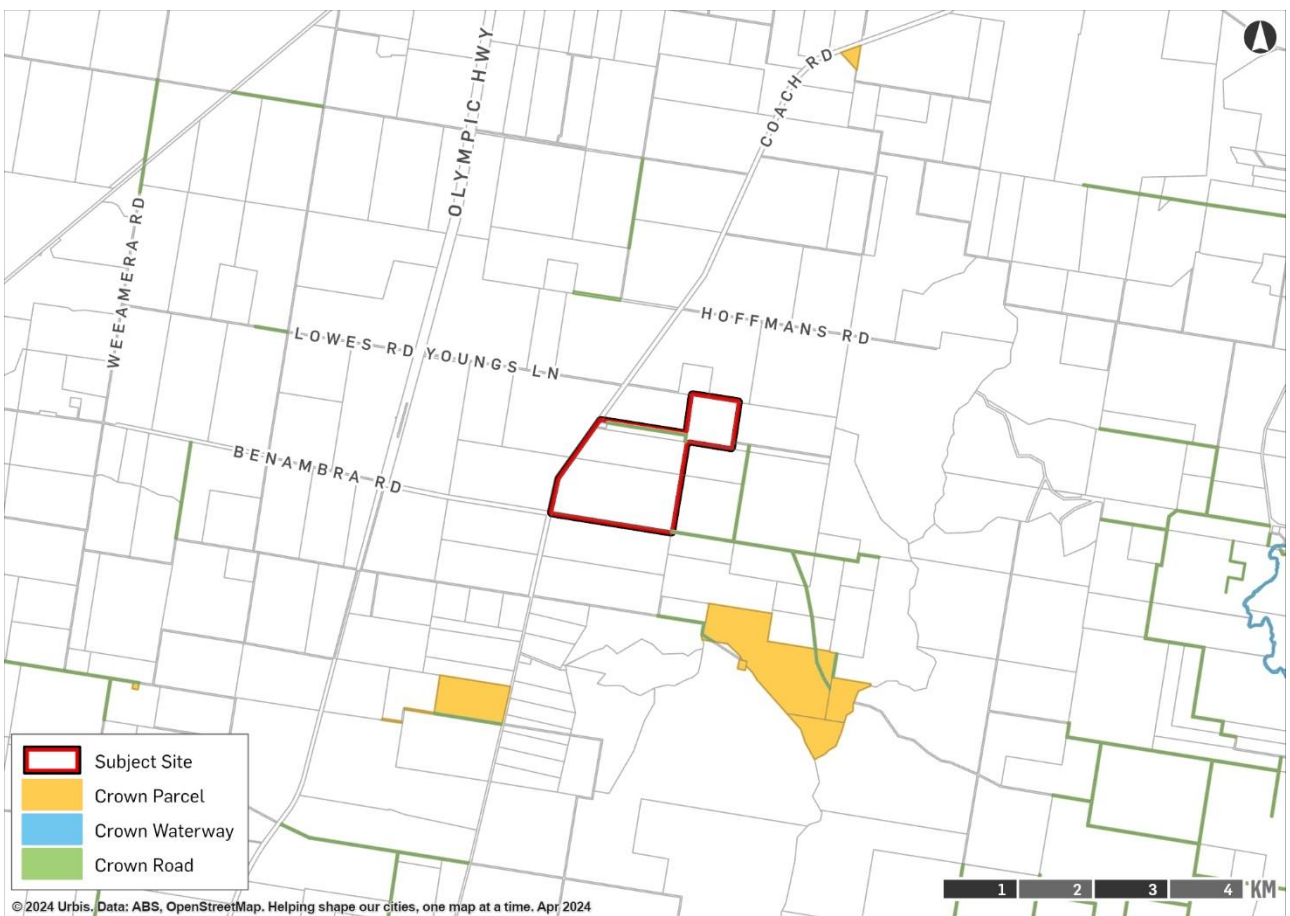
Table 7 Other Approvals required under relevant legislation.

Statutory Reference	Pre-Condition	Relevance
<i>Roads Act 1993</i> (Roads Act)	The Project will require consent from the relevant road authority under Section 138 for works undertaken on public roads, including upgrading and connecting to a private road. The impacts of the project on the transport issues will be addressed within the EIS.	Consistent with Section 4.42 (1) (f) of the EP&A Act 1979, approval of this matter cannot be refused if it is necessary for carrying out SSD that is authorised by a development consent under Division 4.7 and is to be substantially consistent with the consent.
<i>Environment Protection and Biodiversity Conservation Act 1999</i>	Approval from the Minister for the DCCEE is required for any action that will or is likely to have a significant impact on one or more of the Matters of National Environment Significance (MNES).	An EPBC referral is not deemed required following preliminary biodiversity advice. An EPBC referral will be submitted if the BDAR concludes the development could affect any of the MNES.
<i>Water Management Act 2000</i>	The hydrology assessment will identify whether water access licences will be required for the Project. Pursuant Section 4.41 of the E&PA Act, the project will not require a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91.	The Project may require water access licences under the Water Management Act 2000 during the construction phase. This will be confirmed in the EIS.
<i>Native Title Act 1993</i>	A search undertaken on 29 April 2024 of the Native Title Register, the Register of Native Title Claims and Native Title Applications Registration and Determinations did not identify any active Native Title Claim within the site.	An Aboriginal Cultural Heritage Assessment Report will be submitted within the EIS.

Statutory Reference	Pre-Condition	Relevance
<i>Biodiversity Conservation Act 2016</i>	A BDAR will be prepared to accompany the EIS.	The BDAR will assess impacts on threatened species and communities (See Section 6.1.5). Any unavoidable vegetation impacts and biodiversity offsets will be addressed in the EIS.
<i>Fisheries Management Act 1994</i>	Pursuant Section 4.41 of the EP&A Act, the project will not require a permit under section 201, 205 or 219 of the FM Act.	Any works around Red Creek and mitigation measures will be undertaken in accordance with Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013) and Guidelines for watercourse crossings on waterfront land (DPE, 2022).
<i>Heritage Act 1977</i>	Pursuant Section 4.41 of the EP&A Act, the project will not require an approval under Part 4, or an excavation permit under section 139.	It is unlikely that the proposed development would have any impacts on the Historical Heritage.
<i>National Parks and Wildlife Act 1979</i>	Pursuant Section 4.41 of the EP&A Act, the project will not require an Aboriginal heritage impact permit under section 90.	An Aboriginal Cultural Heritage Assessment Report will be submitted within the EIS and outline requirements, impacts, and mitigation measures.
<i>Rural Fires Act 1997</i>	Pursuant Section 4.41 of the EP&A Act, the project will not require a bush fire safety authority under section 100B.	A Bushfire Assessment Report will be submitted within the EIS in accordance with the <i>Planning for Bush Fire Protection 2019</i> Guidelines and the specific matters within section 8.3.5 - Wind and Solar Farms.
<i>Transport and Infrastructure SEPP 2021</i>	<p>Section 2.48 of the T&I SEPP requires a written notice to be given of a project located near electrical infrastructure to the electricity supply authority, inviting comments about potential safety risks.</p> <p>An existing 132 kV transmission line traverses the site, therefore appropriate notice and consultation with the relevant electricity authority would be undertaken in preparation of the EIS.</p>	Written notice will be given to the relevant electricity authority during the EIS phase.

Statutory Reference	Pre-Condition	Relevance
Crown Land Management Act 2016	Under the Crown Land Management Act, Crown Land must not be occupied, used, sold, leased, licenced, dedicated, reserved, or dealt with in any other way unless authorised by the Crown Land Management Act. Pursuant Section 152I of the Roads Act 1993, the Department of Crown Lands may consider transferring the road to Council if suitable.	Correspondence with Council is ongoing regarding the status and potential consent procedures related to Jobsons Road.

Figure 9 Crown Lands and Roads



Source: Urbis

4.3. MANDATORY CONSIDERATIONS

Table 8 outlines the relevant pre-conditions to exercising the power to grant approval.

Table 8 Mandatory Considerations

Statutory Reference	Mandatory Consideration
Consideration under the EP&A Act and Regulation	
Section 1.3	<p>Relevant objectives of the EP&A Act</p> <p>(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State’s natural and other resources,</p> <p>(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</p> <p>(c) to promote the orderly and economic use and development of land,</p> <p>(d) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,</p> <p>(e) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),</p> <p>(f) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,</p> <p>(g) to provide increased opportunity for community participation in environmental planning and assessment.</p> <p>These objectives will be considered and addressed in the EIS.</p>
Section 4.15	<p>In determining a development application, a consent authority is to take into consideration such matters that are of relevance to the development subject of the development application, as stipulated in section 4.15. These include:</p> <ul style="list-style-type: none"> ▪ Relevant environmental planning instruments ▪ Relevant draft environmental planning instruments ▪ Relevant planning agreement or draft planning agreement ▪ Development control plans ▪ The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality. ▪ The suitability of the site for the development ▪ The public interest. <p>These matters would be considered and addressed in the EIS.</p>
Mandatory relevant consideration under EPIs	

Statutory Reference	Mandatory Consideration
<i>Biodiversity Act 2016</i>	<p>Section 7.14 of the BC Act outlines the requirements for biodiversity assessments to be conducted for state significant development. When determining an application, the Minister is required to take into consideration the likely impact of the proposed development on biodiversity values.</p> <p>Section 7.16 of the BC Act, Serious and Irreversible Impacts on biodiversity values, would be considered in the BDAR and EIS.</p>
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	<p>Under Section 3.7 of the Resilience and Hazards SEPP, consideration must be given to guidelines from the Department relating to hazardous or offensive development in determining whether a development is:</p> <ul style="list-style-type: none"> a) a hazardous storage establishment, hazardous industry or other potentially hazardous industry, or b) an offensive storage establishment, offensive industry or other potentially offensive industry. <p>Consideration of guidelines and circulars will be given in the EIS, including Hazardous Industry Planning Advisory Paper No.3 and No.12.</p>
<i>State Environmental Planning Policy (Biodiversity and Conservation) 2021 – Chapter 3</i>	<p>Section 3.3(1) of the State Environmental Planning Policy (Biodiversity and Conservation) 2021 applies to land zoned RU1 Primary production, RU2 Rural Landscape, RU3 Forestry, and equivalent zones in local government areas identified in Schedule 2. The Greater Hume Shire LGA is listed as an applicable LGA.</p> <p>The BDAR will consider the potential impacts on Koala habitat.</p>
Greater Hume Local Environmental Plan 2012	<p>The EIS will address relevant components of the GLEP 2012 including:</p> <ul style="list-style-type: none"> ▪ The objectives and land uses for RU1 – Primary Production Zone ▪ Part 4 – Principal development standards ▪ Part 5 – Miscellaneous provisions ▪ Part 6 – Additional local provisions.
Other consideration under EPIs	
Greater Hume Development Control Plan 2013	<p>Clause 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD.</p> <p>As such, there is no requirement for assessment of the proposal against the Greater Humer Development Control Plan 2013 for this SSDA.</p> <p>Notwithstanding, consideration has been given to general provisions within the DCP, noting there are no specific provisions for renewable energy generation or solar farms.</p>

5. COMMUNITY AND STAKEHOLDER ENGAGEMENT

The following section describes the engagement activities that have been carried out to inform the scoping phase of this project. Engagement activities outlined in this section were undertaken between May and July 2024.

The engagement approach was adapted from the International Association of Public Participation’s Public Participation spectrum. The spectrum (Figure 10) describes goals for public participation and the corresponding promise to the public.

The engagement objectives aligned with the goal of **informing** and **consulting** with stakeholders and the community, to obtain public feedback on the project to inform the preparation of the EIS.

This engagement methodology and its outcomes have also been informed by and are consistent with the NSW Department of Planning, Housing, and Infrastructure (DPHI’s) *State Significant Development Guidelines – Preparing a Scoping Report* and the *Undertaking Engagement Guidelines for State Significant Projects*.

Figure 10 Public Participation spectrum

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions	To obtain public feedback on analysis alternatives and/or decisions	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision-making in the hands of the public.
PROMISE	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

Source: IAP2

To achieve these objectives, the engagement approach involved:

- Leveraging the findings from consultation on nearby solar farms to inform the engagement process and ensure community expectations were proactively addressed.
- Providing consistent, relevant, jargon-free and up-to-date information on the proposal, impacts, benefits, and the planning process through accessible, tailored open lines of communication.
- Providing methods for monitoring and opportunities for the community to give feedback to help inform the planning process.
- Responding appropriately and in a timely manner to concerns or questions raised by the community and stakeholders throughout the lifecycle of the project.
- Facilitating information flow to the project team by establishing working relationships to ensure stakeholder and community views and local knowledge are appropriately incorporated into the design of the project.
- Clearly outlining the negotiables and non-negotiables and the level of effect because of feedback.

- Managing expectations by closing the feedback loop through sharing how stakeholder and community views influenced the proposal.

5.1. ENGAGEMENT CONSIDERATIONS

Three other renewable energy projects are under construction or are expected to be constructed within the surroundings of Culcairn, Walla Walla and Gerogery. These include:

- Walla Walla Solar Farm
- Culcairn Solar Farm
- Glenellen Solar Farm

In this context, the engagement approach to inform the scoping phase considered the community’s existing sentiment towards solar farms.

To support this, Urbis reviewed the feedback received on the projects mentioned above to ensure engagement for the proposed Morven Solar Farm proactively anticipated the known community needs, concerns and feedback.

The engagement approach included:

- Initial consultation with the site landowner to identify the close neighbours.
- Prioritising close neighbours so that those potentially most impacted or interested in the Project received access to information through a number of communication channels (before the broader community).
- Leveraging locally known and valued communication channels to bring awareness to the project, such as local community groups or news outlets.
- Proactively communicating information about the planning pathway and opportunities to provide feedback via phone, email, community newsletters, face-to-face meetings and a community information drop-in session.
- Ensuring local politicians (Local MP, State MP and Councillors) were informed of the consultation process, including offering one-on-one briefings.
- Responding to enquiries in a timely manner through ongoing management of project enquiry lines (phone and email).

5.2. KEY STAKEHOLDERS

As outlined in the *Undertaking Engagement Guidelines for State Significant Projects*, DPHI defines stakeholders as community, relevant agencies, landowners, land users and stakeholders involved in prospective resource developments.

Figure 11 Stakeholder categorisation

Government	Publicly elected officials	Community
<ul style="list-style-type: none"> ▪ Department of Planning, Housing and Infrastructure (DPHI), specifically the: ▪ Planning and Assessment team ▪ Greater Hume Council, specifically the: <ul style="list-style-type: none"> ○ General Manager ○ Director, Environment and Planning 	<ul style="list-style-type: none"> ▪ The Hon. Sussan Ley MP – Member for Farrer, Liberal (Federal) ▪ Justin Clancy MP – Member for Albury, Liberal (State) ▪ Councillors for the Greater Hume area 	<ul style="list-style-type: none"> ▪ Site landowner ▪ Adjoining landowners ▪ Residents and businesses within suburbs include Culcairn, Walla Walla, Moven, Mountain Creek and Gerogery. ▪ Community groups

5.2.1. NSW Department of Planning, Housing and Infrastructure

The Urbis and Elgin held a scoping meeting with DPPI on 8 August 2024.

5.2.2. Greater Hume Shire Council

Urbis and Elgin held an in person consultation with the Greater Hume Shire Council on 28 May 2024.

The focus of the consultation was to determine the site's suitability for a solar farm development, the Council's preferred options for the community benefit sharing scheme, and any other considerations that may need to be addressed by the EIS.

5.2.3. Publicly elected officials

Separate to the consultation with Council, Urbis undertook consultation with publicly elected officials including at local, State and Federal levels.

This category includes Councillors for the Greater Hume Shire LGA, The Hon. Sussan Ley MP – Member for Farrer, Liberal (Federal MP), Justin Clancy MP – Member for Albury, Liberal (State MP)

The focus of the consultation was providing summary information about the project, seeking feedback and bringing awareness to potential community enquiries that they may receive.

5.2.4. Community

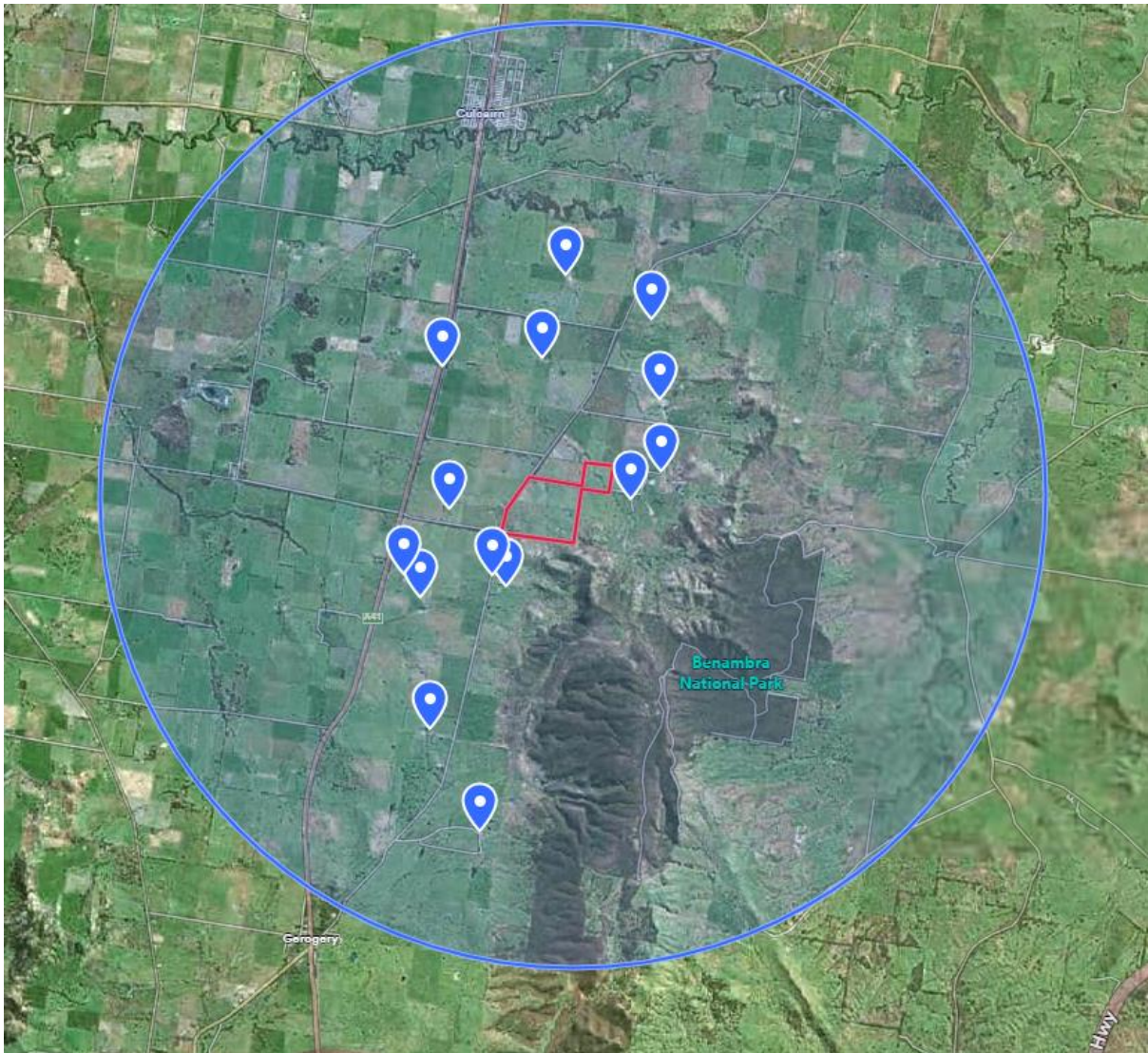
Urbis and Elgin undertook engagement with near neighbours of the site and community groups. The approach to consultation with community stakeholders was informed by Urbis Engagement's previous experience on solar farm projects and feedback from the site's landowner.

5.2.5. Adjoining landowners

Adjoining landowners were identified with the landowner of the project site and based on likely impact or interest during construction and operation. These likely impacts and/or areas of interest were identified as:

- Increased traffic and impact on local road conditions (during construction).
 - Visual impacts (including changes to visual amenity glint and glare).
 - Environmental impacts (including weed/land management during operation).
 - Construction impacts including noise, vibration and dust.
 - Operational impacts, such as maintenance.
- The adjoining landowners are identified within the consultation area as shown in Figure 12.

Figure 12 Distribution area for consultation











5.3. ENGAGEMENT ACTIVITIES

Engagement activities across the community and key stakeholders throughout the planning process are included in the table below.

Feedback from this consultation is included in **Appendix B** of this report. The following engagement activities were undertaken in addition to the consultation to support the scoping report.

The community will continue to be regularly updated following receipt of the SEARs and during the development of the EIS.

Engagement activity	Target stakeholder	Description and reach
Phone calls and letters to four (4) adjoining landowners 	Adjoining landowners	<p>On 6 June 2024, Urbis Engagement called adjoining landowners to notify them about the project and ask whether they had any immediate questions or concerns.</p> <p>Urbis Engagement followed up with landowners who did not respond initially with another phone call on 11 June 2024.</p>
Adjoining landowner letter 	Adjoining landowners	<p>A letter addressed to the adjoining landowners was shared on 8 June 2024.</p> <p>The letter provided summary information about the project and offered the opportunity to meet with the project team. The community newsletter was also attached to this letter.</p>
Distribution of project information via email 	Councillors for the Greater Hume area – Councillors Publicly elected officials – State and Federal Member Community groups	<p>On 17 June 2024, Urbis Engagement contacted the Mayor and Councillors via email to provide information about the project and provide the opportunity for these stakeholders to ask questions or provide feedback. This email also indicated future opportunities to provide feedback during the preparation of the Scoping Report.</p> <p>On 17 June 2024, Urbis Engagement contacted the State and Federal MPs for the local area to provide information about the proposal and provide the opportunity for these stakeholders to ask questions or provide feedback. This email also indicated future opportunities to provide feedback during the preparation of the Scoping Report.</p> <p>On 17 June 2024, Urbis Engagement contacted the community groups outlined above to provide information about the proposal and provide the opportunity for these stakeholders to ask questions or provide feedback. This email also indicated future opportunities to provide feedback during the preparation of the Scoping Report.</p>

Engagement activity	Target stakeholder	Description and reach
<p>Community newsletter</p> 	<p>Residents and businesses within the suburbs of Culcairn, Walla Walla, Moven, Mountain Creek and Gerogery.</p>	<p>Throughout w/c 17 June, a double-sided community newsletter was distributed to all residents and businesses within the suburbs of Culcairn, Walla Walla, Moven, Mountain Creek and Gerogery.</p> <p>The newsletter introduced the proposal, outlined the benefits, potential impacts and relevant technical assessments being undertaken and how to provide feedback or ask questions. This included details of the enquiry phone line and email address and an invitation to the community information drop-in session.</p>
<p>Near neighbour briefings (face-to-face)</p> 	<p>Adjoining landowners</p>	<p>On 4 July 2024, Urbis held three briefings with adjoining landowners.</p> <p>The briefings were to provide information about the proposal, answer any questions and respond to any concerns about the proposal.</p>
<p>Community Information Session</p> 	<p>Broader Community</p>	<p>A community information session was held on 4th July (from 4.30 – 6.30pm). The session was attended by over 35 members of the community.</p> <p>Feedback received included concerns about traffic, agricultural, biodiversity, supply chain, erosion and waste impacts, as well as potential community benefit-sharing schemes and past experiences from previous projects.</p> <p>Urbis Engagement will keep a direct line of contact with adjacent landowners and inform them when appropriate of all steps taken to address concerns raised.</p>
<p>Enquiry management through 1800 number and email address</p> 	<p>All stakeholders</p>	<p>Urbis Engagement received two (2) phone calls and 10 emails through the project enquiry lines.</p> <p>Urbis Engagement will continue to maintain these enquiry lines while awaiting SEARs and during the preparation of the EIS.</p>
<p>Project website</p> 	<p>All stakeholders</p>	<p>Prior to the commencement of the Scoping Phase of engagement, Elgin developed a project website that provided detailed information about the proposal, a Frequently Asked Questions page, a link to the online survey and details of the available communication channels that stakeholders could use to ask questions or provide feedback. The website was updated to provide more detailed information, and proactively respond to community interest.</p>

Engagement activity	Target stakeholder	Description and reach
		The project website can be found here: http://www.morvensolarfarm.com.au/

5.3.1. Issues raised – Council

Given the preliminary nature of the project, the majority of the feedback received during the early consultation phase came from Council, which raised matters about environmental constraints, waste management during decommissioning, development contributions, and planning agreement, as well as socio-economic considerations with potential positive or negative impacts on the community. Full details of the preliminary engagement outcomes can be seen in **Appendix B**.

All these raised matters will be addressed during the EIS phase, and ongoing consultation will be maintained with the Council and the community to enable positive engagement outcomes with the community.

5.3.2. Issues raised – community

The following is a summary of key themes raised through the community consultation. The table in **Appendix B** shows a detailed breakdown per stakeholder, including project response.

Visual impact

- Through consultation, visual impact was a key concern with close neighbours informing us about the impact on vast vistas that they enjoy from their property.

Response: VIA's must consider close neighbours and the view from Jobsons Road.

Site access

- Those consulted told us that site access must be a priority of the proposal. We heard Jobsons Road is used frequently by neighbours (including for crossing cattle) and Coach Road has limits on heavy vehicles.

Response: Because site access and traffic management were raised as one of the most important considerations from the community's perspective, Elgin will explore options to bring forward this piece of work and appoint traffic engineers earlier than required.

Biodiversity

- As a farming community, the community told us that they are concerned about the impacts on the biodiversity of the site as a result of the solar farm. They told us that they would like to see Elgin explore options to improve and prioritise the quality of land and farming options through this process.

Response: Biodiversity is a priority for Elgin. During the development of the EIS, Elgin will be working closely with an ecologist to ensure minimal impacts. Elgin has also undertaken research into the benefits to biodiversity as a result of a solar farm. Findings show that the land/soil is benefiting from the rest in agricultural activity, and the land quality has been shown to improve as a result.

Bushfire management

- Questions about fire risk and management were raised by those consulted. Through consultation, we heard this area is prone to lightning and there is a lack of fire trails being maintained within the Hills / National Park.

Response: Through the EIS process, Elgin will assess the fire risk as a result of the proposed solar farm. This will include assessing the risk of lightning and its close proximity to the national park. All infrastructure (solar panels and BESS) will be designed to the highest standards for fire safety. Fire and Rescue NSW has strict design guidelines that must be incorporated into the project design.

5.4. FUTURE ENGAGEMENT ACTIVITIES

Further engagement with the wider community and key agencies and stakeholder will be undertaken in the preparation and assessment of the EIS including:

- **Key Stakeholders.** It is proposed to consult with the following key stakeholders during the preparation of the EIS:
 - DPHI
 - Greater Hume Shire Council
 - Agencies, including Transport for NSW, TransGrid, Heritage NSW, Fire and Rescue NSW.
 - Surrounding residents, businesses and local community groups.
 - Registered Aboriginal Parties will be consulted early and throughout the EIS preparation.

Additional stakeholders may be identified during the preparation of the EIS.

The engagement approach to support the Scoping phase reached all residents and businesses in Morven, Culcairn, Gerogery, Walla Walla, and Mountain Creek. The level of interest was high, with around half of those consulted expressing support, while others raised concerns about localised impacts.

Given the high level of community interest, Urbis' approach during the EIS preparation will be to ensure all those consulted during Scoping are kept informed about the EIS process and have the ability to provide additional feedback. The Applicant will continue the conversations initiated during the Scoping phase to ensure the community is regularly updated through various channels during the EIS preparation.

The approach to engagement through the EIS preparation will be both targeted and broad, depending upon stakeholder needs. Engagement tools will include:

- **Adjoining landowner briefings:** The Applicant will prioritise updating all adjoining landowners (and nearby residents) first. This process will build on the early consultation carried out during the Scoping phase to continue conversations with close neighbours and demonstrate how their early feedback has been incorporated into the design. All feedback, questions, and concerns from close neighbours will be addressed before engaging the broader community.
- **Community newsletter:** The Applicant will issue a community newsletter to all residents and businesses in Morven, Culcairn, Gerogery, Walla Walla, and Mountain Creek. The newsletter will include a project update and promote the upcoming community information drop-in session.
- **Community information drop-in session:** The Applicant will design and facilitate a drop-in session to support EIS preparation. Given the high attendance at the Scoping information session, the approach will be to present the draft site plan (once developed), show how early feedback was incorporated, and seek further input to inform the final design before the EIS is submitted.
- **Targeted community briefings:** Several community groups identified during Scoping have shown strong interest in the project and expressed a desire to participate in discussions around the potential of a Community Benefit Sharing Scheme, if feasible. The Applicant will continue these conversations during the EIS preparation.
- **Elected officials' briefings and emails:** The Applicant will maintain consultations with elected officials (State and Federal MPs, and Councillors) to keep them informed about the project.
- **1800 number and email:** The dedicated 1800 number and engagement email address for the Morven Solar Farm will remain active, allowing the community to make inquiries. The Applicant will continue to respond promptly to these inquiries.

The Applicant has a proactive approach to addressing community feedback and will be considered as part of further detailed design during the preparation of the EIS.

The Applicant will monitor the effectiveness of this engagement based on the level of feedback and interest (number of enquiries and attendance at the information session). Given the high level of interest during the Scoping, if the community does not respond to the proposed activities (above), The Applicant will reconsider its approach to ensure the relevant community is engaged, interested and participating.

6. PROPOSED ASSESSMENT OF IMPACTS

This section identifies the key impacts which will be further investigated and assessed within the EIS, including the proposed approach to assessing each of these matters. It also identifies some of the matters addressed in the scoping phase that are unlikely to result in significant impacts and do not warrant further consideration in the EIS.

In accordance with the Scoping Report Guidelines, the following factors have been considered in determining the level of assessment required for each matter in the EIS:

- The scale and nature of the likely impacts of the project and the sensitivity of the receiving environment.
- Whether the project is likely to generate cumulative impacts with other relevant future projects in the area.
- The ability to avoid, minimise and/or offset the impacts of the project, to the extent known at the scoping stage.
- The complexity of the technical assessment of the project.

In accordance with the Scoping Report Guidelines, a scoping summary table for each matter is included in Appendix A. A summary of the matters requiring further assessment in the EIS identified, and the level of assessment proposed can be seen in Table 9.

Table 9 Matters identified within the Scoping Phase and Level of Assessment proposed to be undertaken for the EIS.

Level of Assessment	Assessment Matter
Detailed	Traffic and Access
	Aboriginal Cultural Heritage
	Amenity – Landscape and Visual
	Amenity – Noise
	Biodiversity
	Hazards and Risks
	Social and Economic
	Hydrology and flooding
	Bushfire
	Soils and Land Capability
Standard	Waste Management
	Cumulative Impacts
No Further Assessment	Historical Heritage (there are no heritage items located near the site)

6.1. MATTERS REQUIRING DETAILED ASSESSMENT IN THE EIS

6.1.1. Traffic and Access

6.1.1.1. Existing Environment

Access to the project site during construction and operations is proposed via the existing road network (Figure 13, Table 10). Primary access to the site will be through Coach Road and Jobsons Road.

Figure 13 Existing Road Network



Source: Urbis

Table 10 Characteristics of existing road network

Road	Hume Highway	Olympic Highway	Coach Road	Benambra Road	Jobsons Road
Classification / Function	Arterial	Arterial	Municipal	Municipal	Municipal
Sealed (yes/no)	Yes	Yes	Yes	No	No
Movement lanes	Two lanes in each direction	One lane in each direction	Mostly one lane in each direction	One lane bi-directional	One lane in each direction
Parking lanes	No	No	No	No	No
Carriageway width (approx.) (m)	11 m (each direction)	Nine	Seven	Four	Four
Signposted speed (km / h)	110	100	100	N/A	N/A
Line marking / divided lanes	Yes	Yes	Yes	No	No
Pedestrian pathways	No	No	No	No	No
Bus stops	No	No	No	No	No

Source: Urbis

The following intersections shown in Table 2 are proximate to the project site

Table 11 Surrounding Intersections

Intersection	Control Method
Olympic Highway / Greenvale Road	Priority Controlled Intersection
Olympic Highway / Station Street	Priority Controlled Intersection
Olympic Highway / Main Street	Priority Controlled Intersection
Olympic Highway / Coach Road	Priority Controlled Intersection
Olympic Highway / Benambra Road	Priority Controlled Intersection
Jobsons Road / Coach Road	Priority Controlled Intersection
Youngs Lane / Coach Road	Priority Controlled Intersection

Source: Urbis

There is no public transport infrastructure or services that connect directly to the site. The closest public transport stop is Culcairn Station in the town of Culcairn which connects to Albury and Wagga Wagga by NSW TrainLink.

On-demand regional buses are also available from the towns of Culcairn and Gerogery that connect to Albury / Wagga.

There is no dedicated active transport infrastructure surrounding the site, with no footpaths on the roads immediately surrounding the site to enable walking. Cycling is permitted on the shoulder of roads; however,

the nature of these roads (often being unsealed or having an unsealed shoulder) makes cycling on these roads challenging even for experienced riders.

Construction Vehicles

A large number of vehicles related to the construction phase of the project will be required to transport the solar panels, batteries, inverters and bulkier items, including the substation components and step-up transformers. Several construction vehicles will also be required for general on-site activities other than the deliveries.

Four categories of vehicles will be used during the construction phase

- **Light Vehicles:** This category includes cars and light commercial vehicles. These vehicles will be used for personnel movement, including construction personnel, subcontractors, and escort vehicles.
- **Transport vehicles:** These vehicles will transport solar panels, batteries, inverters, substation components, step-up transformers, steel, road construction materials, concreting supplies, and water. They will be larger than personnel vehicles and include oversized vehicles. These vehicles will serve both to deliver materials and for general construction activities on-site.
- **Oversized Transport vehicles and B-doubles:** These will transport large plant materials such as battery packs and transformers.
- **Medium and Heavy Rigid Trucks:** These will be utilised for delivering raw materials and smaller plant materials, waste collection and foundation laying.

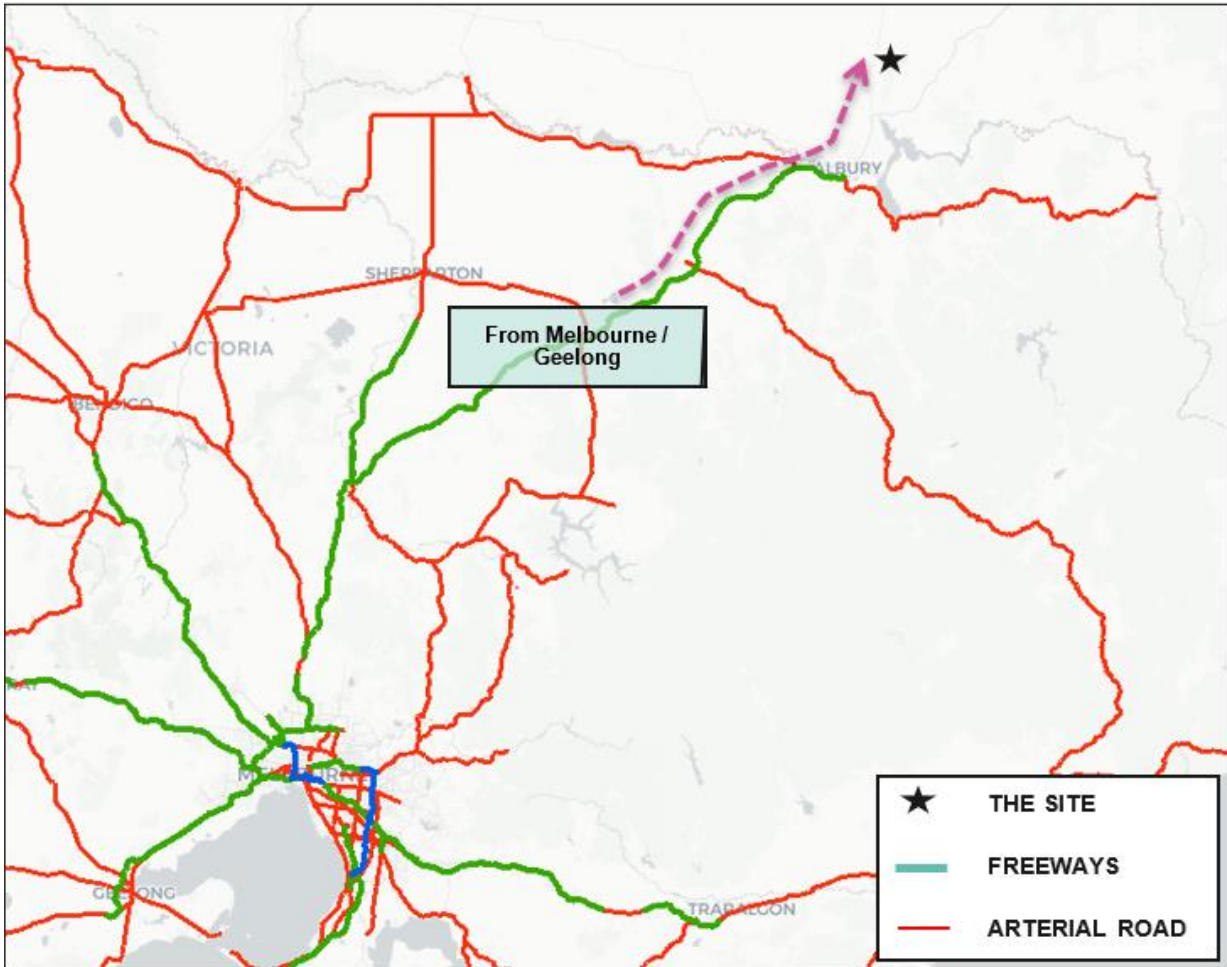
Construction workers are expected to travel to the site using private vehicles, due to the lack of direct public transport options. Given the high volume of workers driving to the site during construction, it will be necessary to implement a strategy for worker transportation and a plan for managing vehicles on site.

During the peak construction phase, minimisation strategies will be implemented according to the Traffic Impact Assessment to mitigate the impacts on the surrounding road network. During the EIS phase, strategies will be explored to achieve this, such as a potential minibus service that could transport the workers to the site from nearby meeting points, worker accommodation or urban areas. Comparing light vehicle movements, where each vehicle typically carries around 2 workers, a single minibus with a capacity of 24 passengers can significantly reduce the number of light vehicles on the road. Therefore, this strategy could help reduce traffic congestion, lowering emissions, and optimise the use of available parking spaces on site. Notwithstanding, this strategy and its feasibility are subject to the findings of the Transport Impact Assessment. Moreover, it should be noted some workers would still require the use of private vehicles, as some specialised tools and equipment cannot be easily transported through other service types.

Haulage Routes

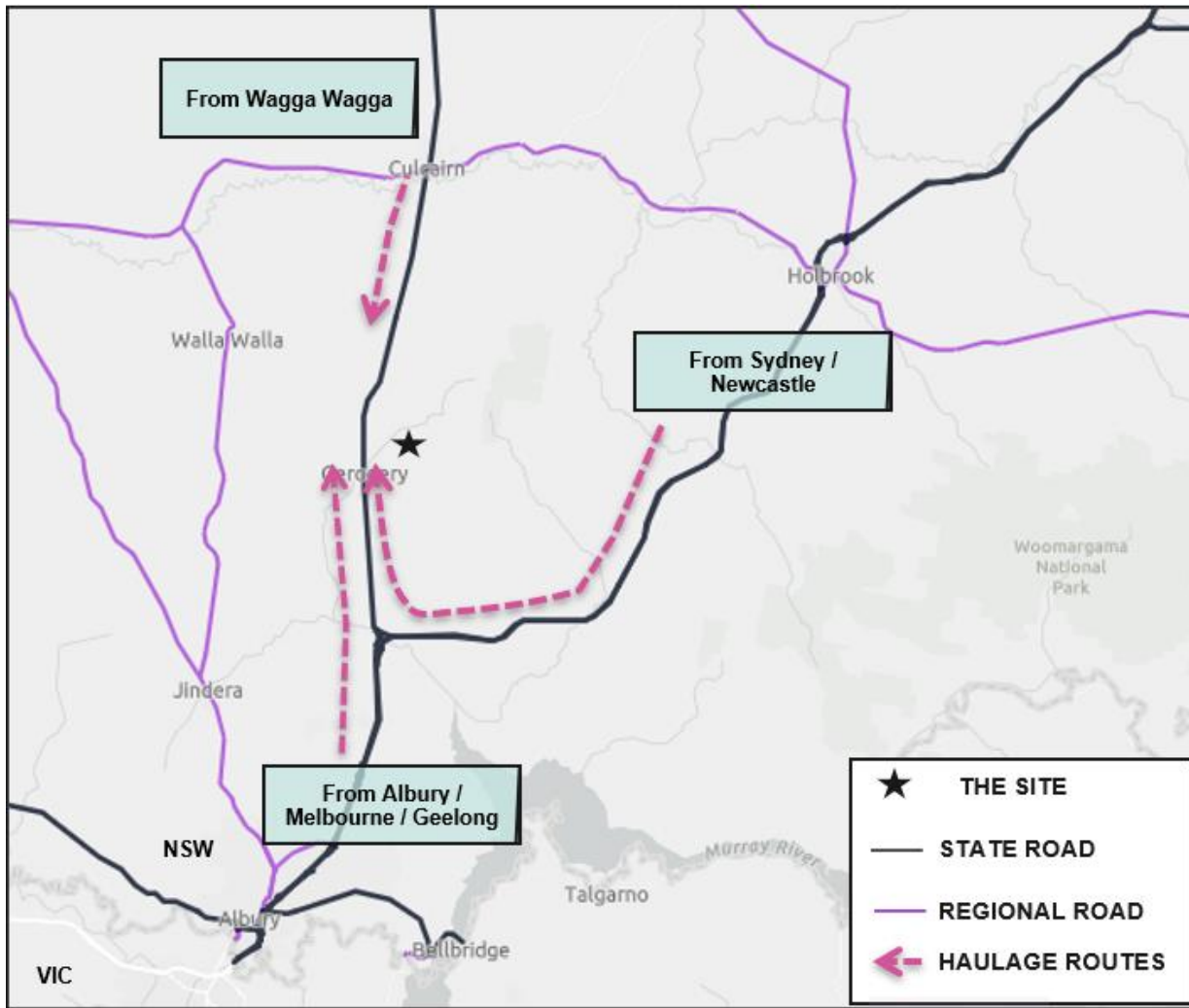
Majority of the construction material delivery vehicles will be travelling to the site from either the Melbourne or Sydney ports. The potential haulage routes are demonstrated in Figure 14 and Figure 15 below which consider the hierarchy of state, arterial and regional roads for both Victoria and NSW respectively.

Figure 14 Potential haulage route for materials transported from Melbourne or Geelong.



Source: Urbis

Figure 15 Potential Haulage Routes within NSW



Source: Urbis

The Olympic Highway, Coach Road, Benambra Road, and Taylors Road are all sanctioned as B-double routes. The presence of railway crossings at all routes connecting the site and the Olympic Highway, as well as signage prohibiting entry for vehicles exceeding 15m on Coach Road necessitates further investigation and swept path testing of the haulage routes to the site.

6.1.1.2. Assessment Approach

A Transport Impact Assessment report will be provided within the EIS to consider the potential impact of the project on the road network. The reporting will analyse existing and expected traffic impacts (including cumulative impacts from other major projects within the catchment area) on the local road network during construction and operation, including assessment of the proposed entry points to the site. Further considerations will relate to potential road infrastructure upgrades related to the project and anticipated haulage routes.

Once operations at the solar farm have ceased, it is expected that the Site will be decommissioned and rehabilitated in accordance with the Large-Scale Solar Energy Guidelines.

It is expected that personnel and vehicle movements required for the decommissioning of the Site will reflect that of the construction phase. This will be considered further in the Transport Impact Assessment prepared during detailed assessment as part of the EIS.

The TIA will identify management and mitigation measures to maintain road safety. The TIA will be prepared in accordance with the *Austrroads Guide to Traffic Management Part 12*, Australian Standards and any complementary TfNSW Supplements, and *Roads and Maritime Guide to Traffic Generating Developments*.

6.1.2. Aboriginal Cultural Heritage

Aboriginal cultural heritage incorporates tangible and intangible cultural heritage. Tangible cultural heritage can include Aboriginal stone tools, scarred trees, earth mounds, burials, engraved or painted rock art, while intangible cultural heritage can include dreaming stories, cultural landscape and cultural connections through the landscape. Aboriginal cultural heritage is governed by the *NSW National Parks and Wildlife Act 1974* in NSW.

This scoping reports includes an early constraints assessment for tangible Aboriginal cultural heritage only. It is understood that investigating and managing intangible Aboriginal cultural heritage in this rural environment is an important aspect of gaining the trust of the community and should be started early in the EIS phase.

Urbis has undertaken the following tasks:

- A preliminary Opportunities & Constraints Assessment .
- Basic and extensive search of the Aboriginal Heritage Information Management System (AHIMS).
- High level constraints analysis of landscape features in line with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW, 2010)*.

This preliminary Opportunities & Constraints Assessment is not a comprehensive archaeological assessment of the subject area and does not include historical archaeology. It also does not meet the requirements of a formal Aboriginal Objects Due Diligence Assessment, or Aboriginal Cultural Heritage Assessment. The assessment of the subject area is based on desktop analysis only.

Further assessment will be undertaken during the EIS phase to determine the impact of any proposed works on the heritage items in proximity and the surrounding landscape, as well as the cumulative effect of any major projects on the cultural heritage of the area.

6.1.2.1. Existing Environment

Native Title

A desktop review was undertaken to identify any Native Titles or Claims on 13 June 2024. The review comprised of a search within the National Native Title Register, the Register of Native Title Claims, and the Native Title Applications Registration and Determinations.

The assessment did not reveal any active Native Title or Claim under the Commonwealth's Native Title Act 1993.

Registered Aboriginal Objects

- Basic and Extensive search of the AHIMS was conducted on the 13 June 2024 (AHIMS Client Service ID: 900511) that identified:
- There are no declared Aboriginal sites within the site nor within a 1 km radius.
- There are no declared Aboriginal places in or near the site.
- The AHIMS extensive search identified Artefact and Modified Tree Aboriginal site types (see Figure 16).
- The paucity of Aboriginal sites near and within the subject area does not indicate low potential for such within the site. Rather, this is likely a result of the lack of archaeological investigations within the area.

Natural Landscape

The purpose of reviewing the natural landscape of the project area is twofold. It assists in the prediction of the intensity and nature of Aboriginal land use and deposition of archaeological material in the project area by considering the landforms and resources that would have played a part in the everyday lives of Aboriginal people. It also assists in the determining the likelihood that those material remains would have survived any natural geomorphological process or historical ground disturbance.

The site has been used for agricultural purposes for the past century. The site is being used now for sheep grazing. Red Creek and several unnamed water lines traverse the site, which can increase the potential presence of Aboriginal items and sites.

The site sits on a low slope that extends into a sprawling plain. The soil landscapes in the subject area are Castlestead, Four Mile Creek and Hell Hole. The Castlestead soil landscape has moderately deep soils with an A-horizon that extend to 0.8 metres. Soils located on low slopes or flat areas commonly occur as up to 0.3 m of yellowish-red sandy clay loam, overlying up to 0.5 m of brown sandy clay loam, overlying up to 0.9 m of strong brown clay.

The Four Mile Creek soil landscape has moderately deep soils and occurs on low slopes as up to 0.4 of dark yellowish brown silty clay loam (A-horizon) overlying up to 1 m of brownish yellow light medium silty clay (B-horizon).

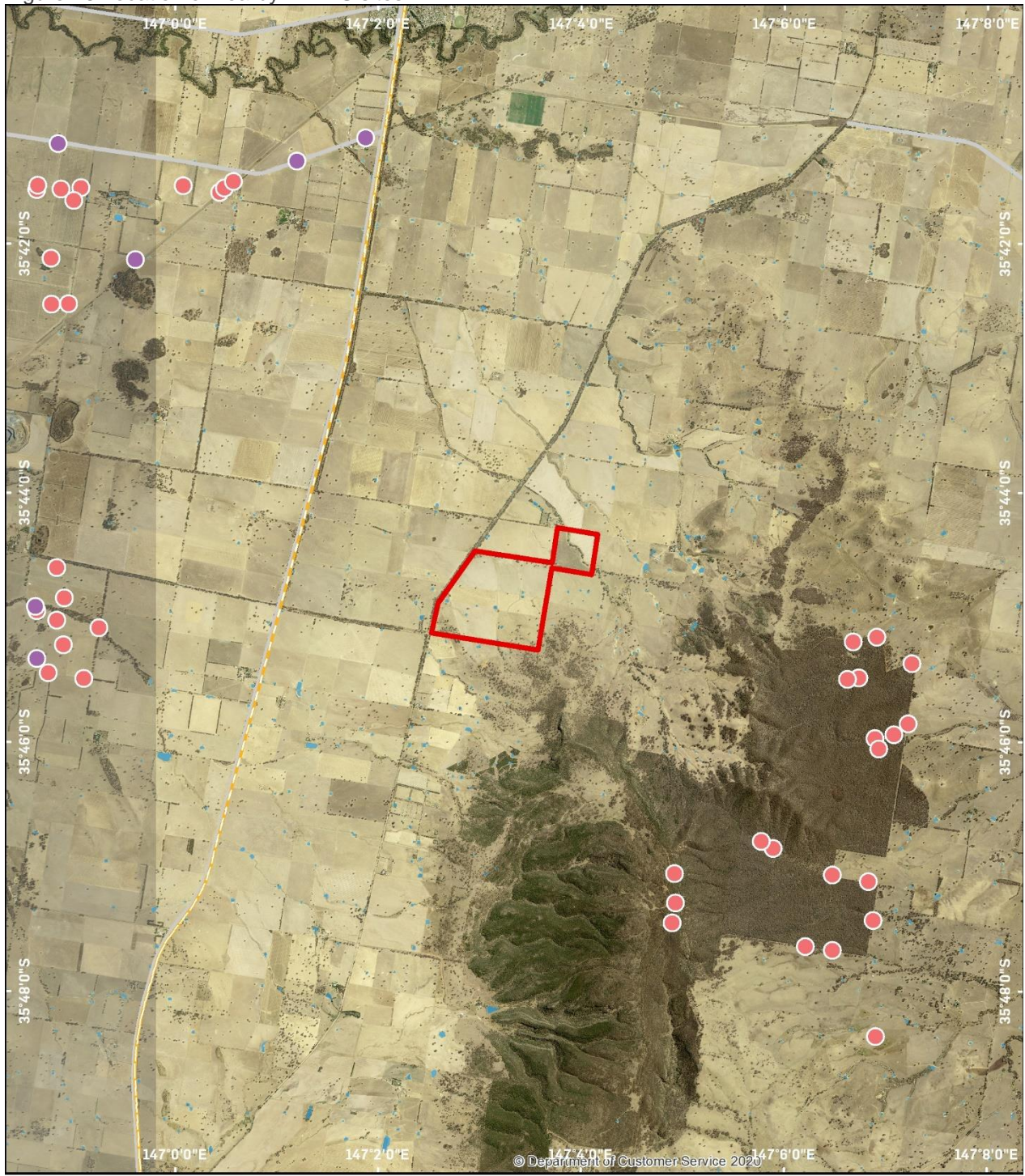
The Hell Hole soil landscape contains shallow soils with an A-horizon of 0.1 m – 0.3 m in low slopes and depressions which occurs within the subject area. Within low slope contexts soils commonly occur as up to 0.1 m of strong brown sandy loam, overlying up to 0.9 m of yellowish-red light clay, overlying up to 1.1 m of red, light-medium clay. In depressions the soils commonly occur as up to 0.3 m of very dark grey, brown clay loam, overlying up to 0.8 m of grey, brown clay. Rock outcrops are also present within the Hell Hole soil landscape. This could indicate potential for Aboriginal objects that are associated with rock outcrops such as grinding grooves or rock engravings.

Landscape features with potential for Aboriginal objects identified under the Due Diligence Code exist in the subject area are the following:

- Within 200 m of waters.
- Rock outcrops are present within the subject area.

Figure 17 below shows the sensitivity mapping for Aboriginal cultural heritage incorporating the landscape feature context of the due diligence assessment. The mapping is based on desktop assessment only. These areas may be amended based on the results of a physical survey of the project site. Additionally, it should be noted that where Aboriginal objects are found to be present, there are mitigation options available compatible with the project works. The Aboriginal Cultural Heritage Assessment will determine these options.

Figure 16 Location of nearby AHIMS sites.



GDA 1994 MGA Zone 55

© 2024. Data: ABS, OpenStreetMap, DFSI Spatial Services NSW. Helping shape our cities, one map at a time. Jul 2024



Project No: P0047056
Project Manager: Ali Byrne

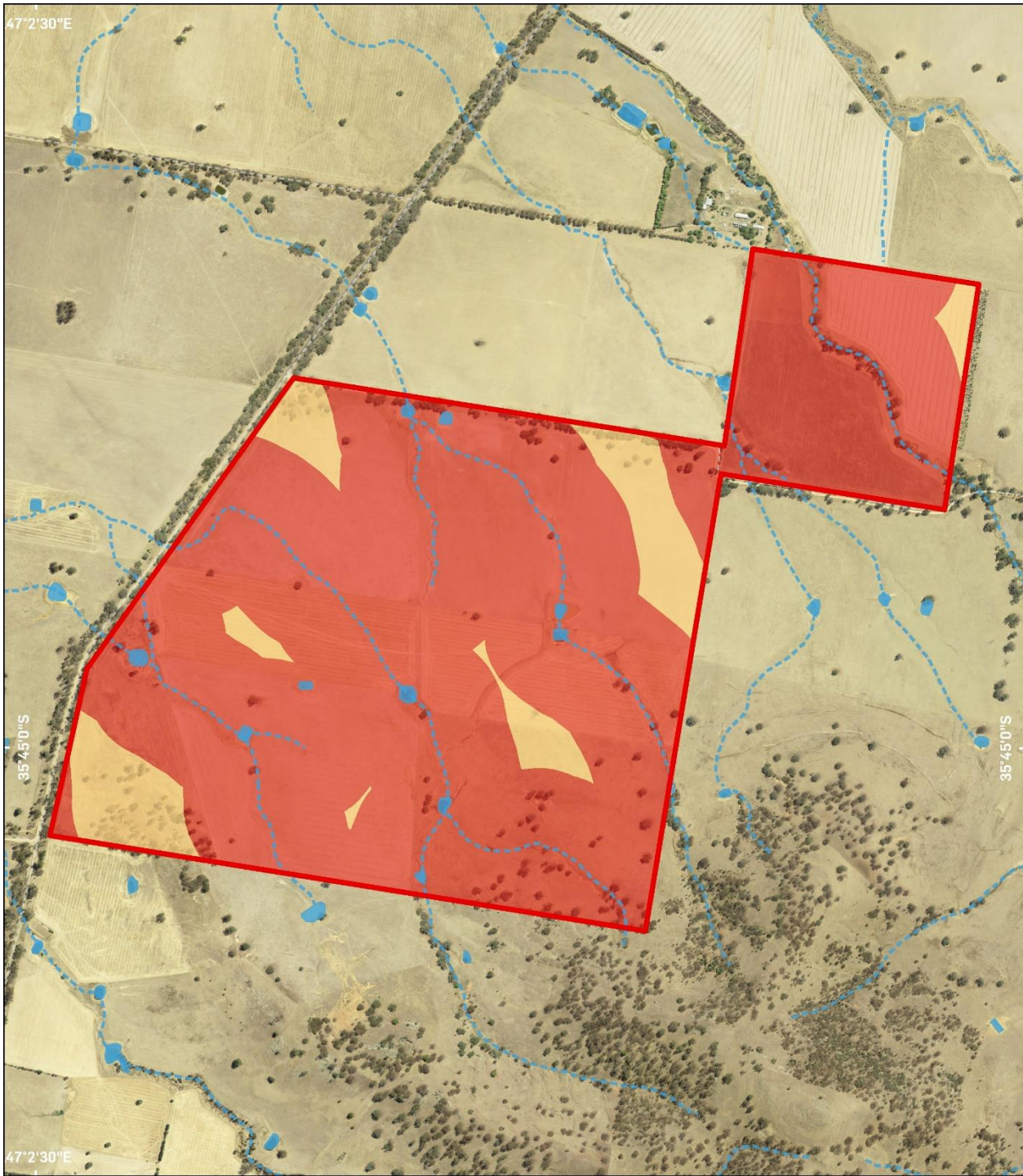
AHIMS SITES IN EXTENSIVE SEARCH AREA

Morven Solar Farm
Elgin Pty Ltd

- Subject Area
- Artefacts
- Hydrology
- Modified Tree

Source: Urbis

Figure 17 Aboriginal Heritage Sensitivity Areas



GDA 1994 MGA Zone 55

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ABORIGINAL HERITAGE SENSITIVITY MAPPING

Morven Solar Farm
Elgin Pty Ltd

Project No: P0047056
Project Manager: Ali Byrne

- Subject Area
- Hydrology
- Ephemeral
- Suspected Medium Sensitivity Areas
- Suspected High Sensitivity Areas

Source: Urbis

Previous Archaeological Investigations

Previous Aboriginal archaeological investigations undertaken within or near to the subject area may provide information about known Aboriginal sites that have not previously registered on the AHIMS database. Additionally, Aboriginal archaeological investigations undertaken in the broader region may provide information on the types of archaeological site features that are likely to occur within the subject area.

The following archaeological investigations were identified as being located within the vicinity of the present subject area.

GML, 2022, ACHA, Inland Rail: Albury to Illabo

GML was engaged by Australian Rail Track Corporation to prepare an Aboriginal Cultural Heritage Assessment for the construction of the Albury to Illabo section of the Inland Rail program. A portion of the study area (Zone 4) is located on the Olympic Highway at Culcairn approximately 7.5 km northwest of the present subject area (see Figure 18).

The ACHA included a survey program which found seven new sites between Zone 4 and Zone 5 (spanning approximately 7.5km - 25km northwest of the present subject area). All new sites identified in this location were quartz artefacts. Part of Zone 4 that was in a wetland environment was also identified by the RAPs to have important natural habitat values. The predictive modelling for the study area also identified a tendency for stone artefacts to appear in undisturbed contexts where they are within proximity to a watercourse.

The proposed works were modified to mitigate harm to Aboriginal objects where possible. The report recommended the preparation of a heritage sub-plan within the Construction Environmental Management Plan which included measures to protect Aboriginal sites from the proposal.

The survey area was located in proximity to waterways including Billabong Creek. The present subject area also is located in proximity to waterways. Therefore, Aboriginal objects may also occur within the subject area.

NGH Environmental, 2020, ACHA, Walla Walla Solar Farm

NGH Environmental were engaged by FRV services Australia to prepare an Aboriginal Cultural Heritage Assessment for the development of a new solar farm at Walla Walla. The study area encompassed a 605-ha area and is located approximately 6 km to the southeast of the present subject area (see Figure 18).

As part of the ACHA a survey was undertaken which found 23 isolated finds, 11 artefacts, two modified trees and two PADs. Three cultural trees were also identified by the Registered Aboriginal Parties (**RAPs**). The results demonstrate the potential for archaeological resources within areas disturbed by agricultural activity. The predictive model for the site found that waterways and elevated ground appear had the strongest correlation with Aboriginal cultural material.

The report recommended the proposed works avoid all Aboriginal sites identified. Salvage excavation was recommended where avoidance was not possible. The report also recommended the preparation of a Cultural Heritage Management Plan in consultation with the registered Aboriginal parties for the management of artefacts and Aboriginal sites in the survey area.

The survey area was located in proximity to waterways including Back Creek and Middle Creek. The present subject area also is located in proximity to waterways. The survey area for Walla Walla Solar farm has also historically been used for agricultural activity like the present subject area. Therefore, the similar landscape context and historical activity that has occurred within the Walla Walla Solar Farm site indicates that Aboriginal objects may also occur within the current subject area.

NGH Pty Ltd, 2019, ACHA, Culcairn Solar Farm

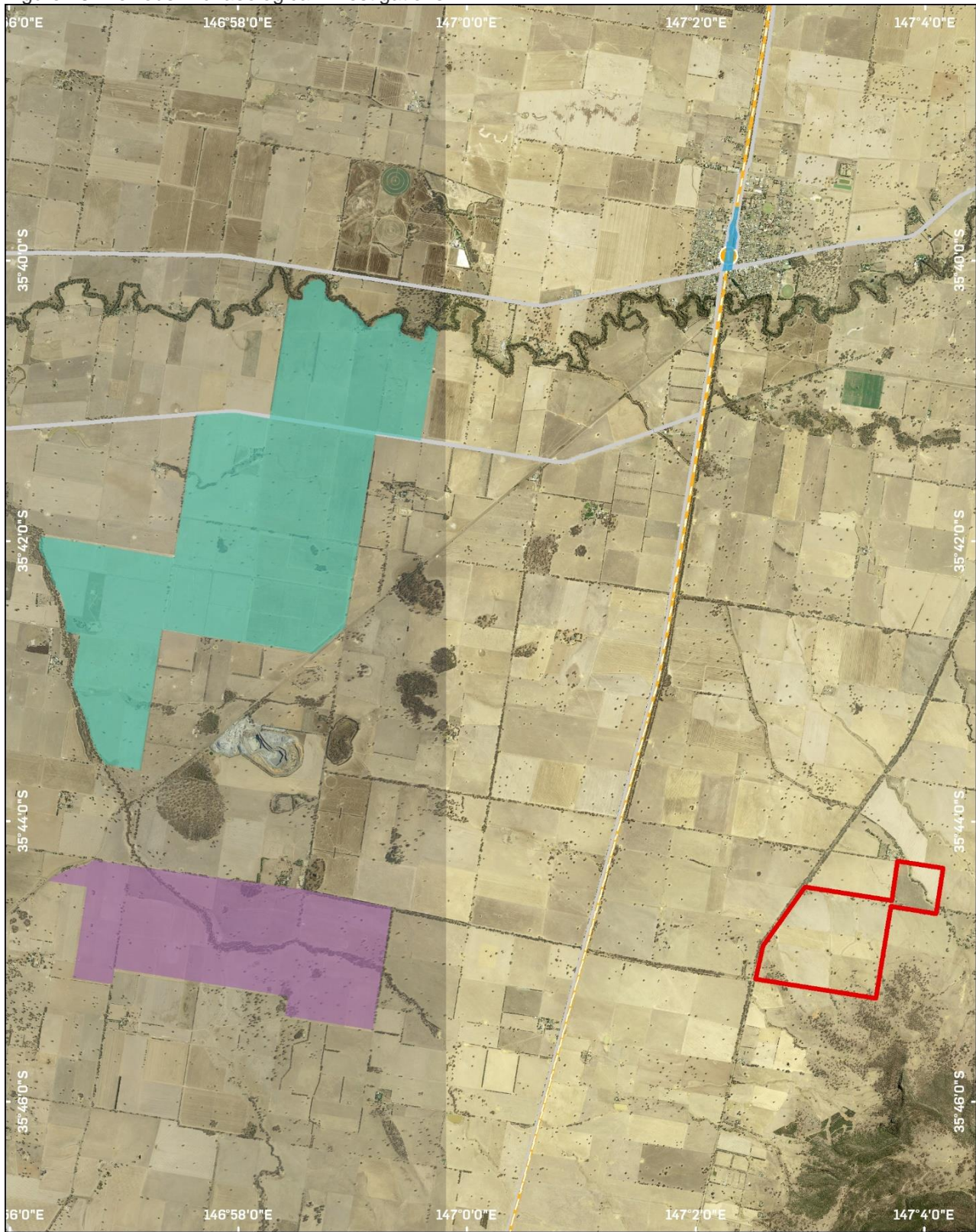
NGH Pty Ltd were engaged by to prepare an Aboriginal Cultural Heritage Assessment for the development of a new solar farm at Culcairn. The study area encompassed a 1,351-ha area and is located approximately 9.5 km to northwest of the present subject area (see Figure 18).

As part of the ACHA a survey was undertaken which found 26 isolated finds, 19 artefact scatters, three modified trees, 2 PADs, 5 cultural tree sites and 1 cultural stone site. The results demonstrate the potential for archaeological resources within areas disturbed by agricultural activity.

The proposed works were assessed as having low harm to the Aboriginal sites and therefore the report recommended salvage and reburial of any impact artefacts, measures to protect Aboriginal sites and the preparation of a Cultural Heritage Management Plan.

The survey area was located in proximity to waterways including Back Creek and Billabong Creek. The present subject area also is located in proximity to waterways. The survey area for Culcairn Solar farm has also historically been used for agricultural activity like the present subject area. Therefore, the similar landscape context and historical activity that has occurred within the Culcairn Solar Farm site indicates that Aboriginal objects may also occur within the current subject area.

Figure 18 Previous Archaeological Investigations.



GDA 1994 MGA Zone 55

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PREVIOUS ARCHAEOLOGICAL INVESTIGATIONS

Project No: P0047056

Morven Solar Farm

Project Manager: Ali Byrne

Elgin Pty Ltd

- Subject Area
- Walla Walla Solar Farm
- Culcairn Solar Farm
- Inland Rail: Albury to Illabo

Source: Urbis

Aboriginal Archaeology Conclusions

- There are no declared Aboriginal sites within the site nor a 1 km buffer.
- There are no declared Aboriginal places in or near the site.
- The AHIMS extensive search identified Artefact and Modified Tree Aboriginal site types (see Figure 16).
- The paucity of Aboriginal sites near and within the subject area does not indicate low potential for such within the site. Rather, this could be due to a result of the lack of archaeological investigations within the subject area.
- The presence of ephemeral waterways and potential for rock outcrops within the subject area indicates high archaeological sensitivity, noting waterways have been highly disturbed through agricultural production activities.
- Previous archaeological investigations in the surrounding area indicate that there is potential for Aboriginal sites in nearby and similar environmental contexts.
- Based on the above information, sensitivity for Aboriginal cultural heritage is mapped in Figure 17.
- The subject area is determined to have moderate-high Aboriginal archaeological potential.

6.1.2.2. Assessment Approach

An ACHAR will be prepared to inform the preparation of the EIS and will accompany the SSDA. In addition to this, preparing a Cultural Values and/or Landscape assessment that would provide an assessment of the intangible cultural heritage values will be considered. A confirmed status of Jobson Road may inform the ACHAR.

Early engagement with the local Aboriginal community and mapping of potential Aboriginal cultural heritage resources, as well as finding ways of celebrating Aboriginal cultural heritage through the design of the project will be considered during the EIS phase.

The ACHAR, will be prepared in accordance with the following guidelines:

- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011).*
- *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010).*
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW 2010a) ('the Consultation Guidelines')*

The following principles will be followed so that the proposed development will assess and manage Aboriginal cultural heritage in the most efficient and transparent way:

- An ACHAR will be required to assess Aboriginal cultural heritage including tangible and intangible values. Archaeological excavation may be required for areas within the proposed footprint that are assessed to have Aboriginal archaeological potential.
- The ACHAR should also be supported by the early preparation of a Cultural Values and Landscape Assessment to assess intangible cultural heritage. Urbis recommends that both these reports are commenced as soon as possible to prevent delays to the project.
- Opportunities also exist for engagement with Aboriginal community members through consultation as part of the ACHA process and the Connecting with Country Framework issued by the Government Architect NSW to inform landscaping approach of the development.

6.1.3. Amenity – Landscape and Visual

6.1.3.1. Existing Environment

The site and surrounding area are situated within the NSW South Western Slopes Bioregion, which is predominantly characterised by large areas of foothills and ranges with a wide range of rock types and inland streams within confined valleys of sloping terrain. Typical features of this region include hilly landscapes and volcanic rocks which form hills and valleys in the east, bringing higher average rainfall to the eastern areas,

such as the Great Dividing Range and topography and rainfall decreasing towards the west where mean rainfall rates are lower. Local examples of these typologies include nearby Benambra National Park, where several creeks including Hermitage Creek, Pretty Gully and Snake Gully wind through the lower elevations of the Great Yambra Ridge, forming small water bodies within depressions that feed into larger systems such as Lake Hume, approximately 20km south of the project site.

The immediately surrounding landscape and visual context within 8km is relatively flat and open but surrounding land has been modified to facilitate agricultural activities such as grazing including visible structures (sheds, outbuildings etc), striations and discolouration from agricultural use, cleared land and crop rows. Surrounding vegetation patterns are highly modified, for example, linear roadside, shelter belts along property boundaries and cleared areas for access trails. The immediate visual context includes riparian vegetation and stands of remnant or regenerating native vegetation.

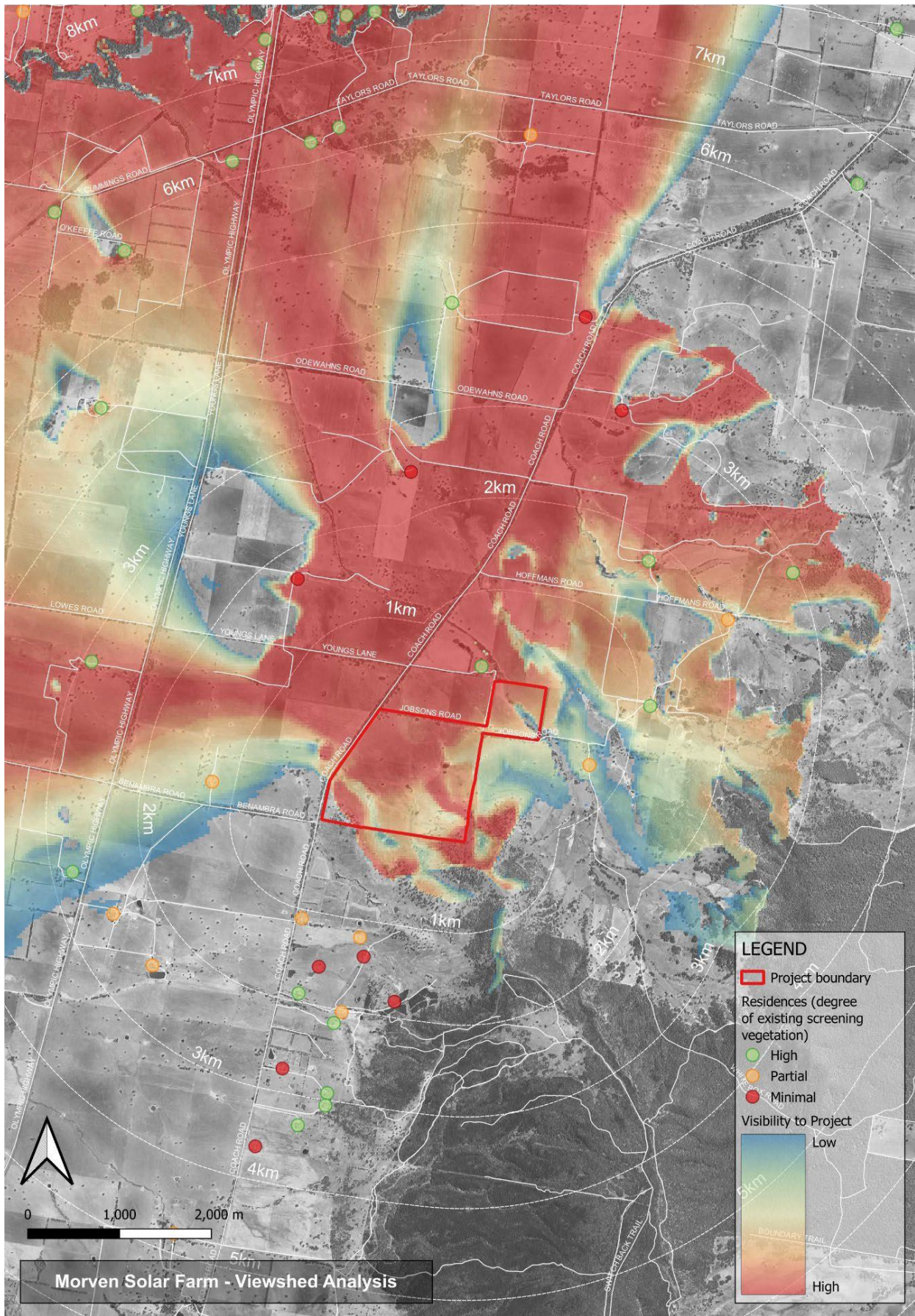
The scale and form of surrounding development is typical of rural residential settlements, characterised by single storey residential buildings on large lots which include ancillary structures used for agricultural purposes such as sheds, silos, water tanks, livestock fencing, and solar panel installations (of a residential scale). Many properties include dams for livestock. Surrounding residential settlement patterns are disparate, where rural residential dwellings are widely dispersed. The closest dwelling is 100 metres north of the project site, with residential dwellings within 5km to the northeast, west and south of the site.

Urbis has used elevation and topographical data to understand potential visibility to any part of the site or proposed solar panels from the surrounding visual catchment. The potential visual catchment is the theoretical area within which parts of the site including the proposed solar array (approximately 3.5 m above natural ground level) may be visible.

The visibility of any proposed development varies depending on constraints such as the blocking effects of intervening topography, vegetation, and built form. Visibility also considers the extent to which the proposal would be physically visible, identifiable for example as a new, novel, contrasting element or alternatively as a recognisable but compatible feature. Noting the view shed map is accurate, based on numerical inputs the actual potential visibility will need to be 'ground truthed' or accurately tested from specific view places.

The viewshed map (Figure 19) shows the likely visibility to the site from surrounding areas, based upon topography only (no vegetation). It is noted that the foothills of the Tabletop Ranges are considered a visually sensitive area. Urbis has determined the extent of localised potential visibility to the proposed development by analysing aerial imagery and Google Earth data to consider potential blocking effects of topography (indicated by viewshed) and intervening vegetation (indicated by coloured dots) in relation to surrounding dwellings within 8km of the site.

Figure 19 Viewshed mapping, indicating potential visibility (topography only, no vegetation).



Source: Urbis, 2024

The viewshed indicates potential visibility to the project as follows:

- Areas of high visibility predominantly occupy the north-western parts of the site and are expansive to the north, north-west and west, noting visibility is likely highly constrained given the landscape is predominantly flat.
- Visibility to the site is highly constrained from the south and south-east due to the elevated ridgelines within Benambra National Park, which fall outside the visual catchment.
- There is no visibility to the site beyond 3km to the north-east.
- Visibility from the east is low to moderate, constrained to within 3km of the site.
- There are limited elevated viewing opportunities surrounding the site.

The closest public domain locations within the visual catchment include the immediate road network such as Coach Road and Jobsons Road, and sections of the Olympic Highway and Melbourne-Sydney rail corridor.

It is likely that the blocking effects from riparian vegetation (Billabong Creek), roadside vegetation, shelterbelts and lot boundary planting will further constrain visibility to the site from more distant locations within the visual catchment to a significant extent.

Urbis has followed the *DPHI Technical Supplement to the Large-Scale Solar Energy Guidelines 2022* to determine whether the identified viewpoints will require further detailed assessment. The calculations principally determine the vertical and horizontal field of view that a development is likely to occupy when viewed from each viewpoint, and is influenced by distance, height elevation changes and horizontal extent (width) of a project.

It is noted that additional factors can reduce the ability to perceive solar farms in the landscape, such as lighting conditions, reflections of sky on the horizontal form, visual prominence and contrast with surrounding landscape features as well as the screening effects of vegetation. Based on the preliminary assessment analysis within 4km of the site and knowledge of solar panels within the natural landscape, Urbis provides the following summary of potential visual effects or impacts for private dwellings:

Low Risk

- There are a total of 28 dwellings within 4km of the subject site, half of which fall outside the visual catchment.
- Of the remaining 14 dwellings, four are located within high visibility zones, however benefit from high levels of vegetative screening (green dots within the Viewshed Analysis).
- Six are located within low to moderate visibility zones and are benefited by partial to high levels of vegetative screening (orange and green dots).
- Based on the information available it is considered that there is a low risk of any significant visual effects for residences – that is, low potential ability to perceive the low-height, linear visual change, and identify it as contrasting, within the surrounding landscape setting.
- The majority of dwellings within 4km are at low risk of potential exposure to any significant visual effects and are highly unlikely to be subject to any significant visual effects.

Moderate Risk

- Four dwellings are located within high visibility zones and have low levels of vegetative screening (red dots). The closest of these dwellings is within 2km of the north-western corner of the site.

6.1.3.2. Assessment Approach

It is proposed that a detailed Visual Impact Assessment prepared in accordance with the *Technical Supplement to the Large-Scale Solar Energy Guidelines* will be undertaken by a qualified expert as part of the EIS phase.

The assessment will highlight ground-truthed visual impacts on surrounding residences, key locations and significant vistas in the public domain. Any identified impacts will be proposed to be mitigated, when necessary, which may include a draft landscaping plan on on-site perimeter areas for affected landowners. This would be prepared in conjunction with a Glint and Glare Assessment to identify and mitigate potential

glint and glare impacts on adjoining neighbours and vehicles. Cumulative impacts from other major projects within 4km or close sensitive locations will also be considered during the assessment.

6.1.4. Amenity – Noise

6.1.4.1. Existing Environment

The site is located in rural Culcairn and surrounded by rural and agricultural production land uses. It is anticipated that the existing background noise levels are typical of a rural setting with the predominant noise sources being from vehicle movement along Coach and Jobsons Roads.

As part of an initial assessment, a total of 28 residential potential receivers have been identified within 4 km of the site, including one non-associated potential receiver within 1km of the site.

6.1.4.2. Assessment Approach

It is anticipated that immediate acoustic impacts will predominantly occur during the construction phase of the project, associated with the operation of equipment and heavy machinery needed. It is considered that acoustic impacts during the construction phase would be short term and manageable with appropriate mitigation measures and construction activities.

Following construction, operational noise levels would be limited to the location of the inverters, BESS and other noise-generating ancillary infrastructure. The proponent is currently finalising the BESS equipment configurations and requested detailed noise emission data from the BESS provider. A Noise Impact Assessment will utilise technical inputs and provide recommendations and measurements to address EPA noise policy requirements and mitigate any potential impacts to receivers or nearby neighbours. It is anticipated that the location and orientation of noise-emitting equipment may be refined following the Noise Impact Assessment. For example, the inverters can be located further away from sensitive receivers to minimise any impacts.

A suitable qualified specialist would prepare an assessment of the noise impacts of the development in accordance with the *Interim Construction Noise Guideline* for its inclusion in the EIS. Furthermore, operational noise impacts will be assessed in accordance with the *NSW Noise Policy for Industry (2017)*. Other considerations, such as cumulative noise impacts (considering other similar developments in the area), will also be included as part of the acoustic assessment. In the unlikely case that the proposal is assessed as likely to exceed applicable noise criteria, a draft noise management plan will be also submitted as part of the EIS.

6.1.5. Biodiversity

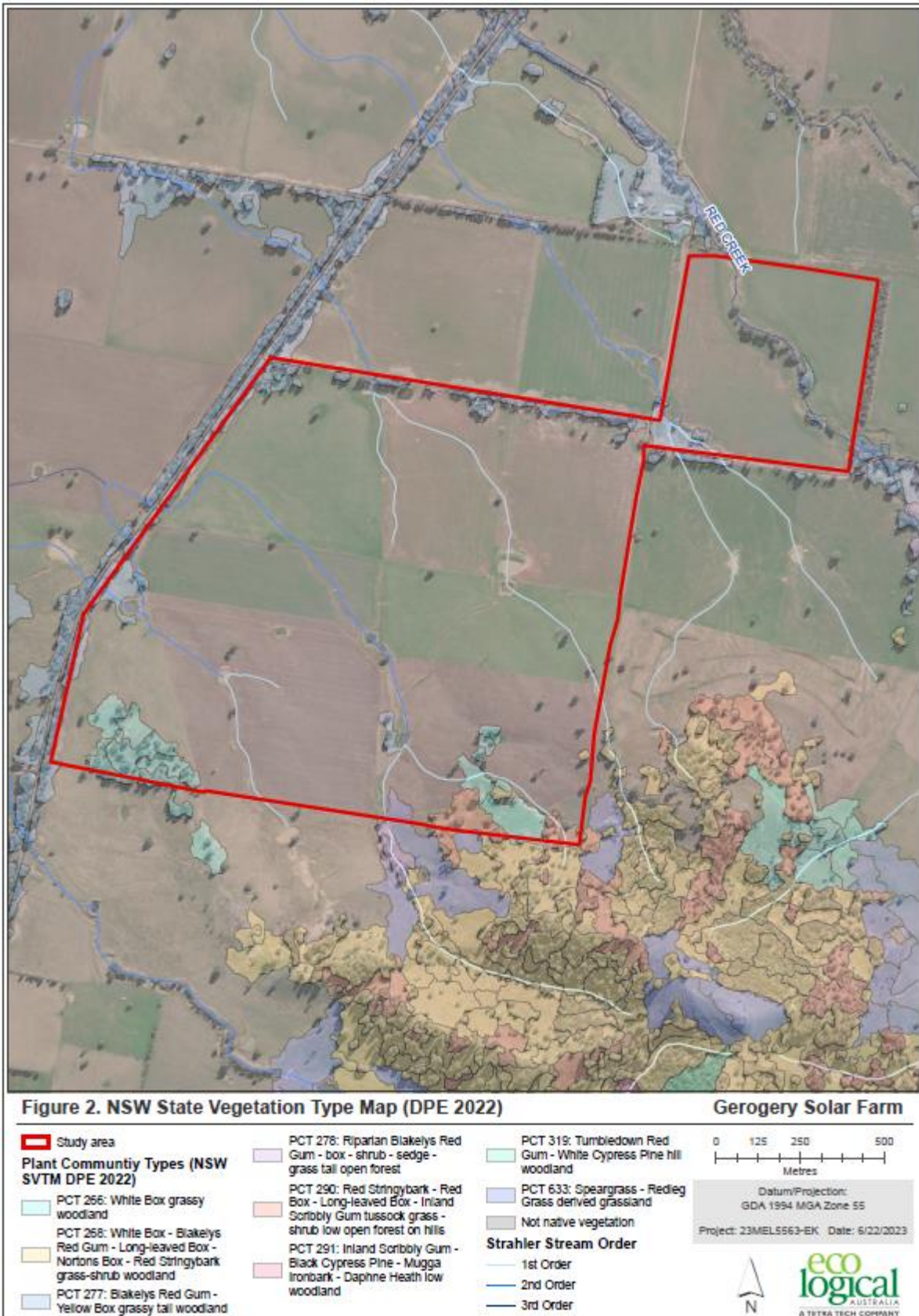
6.1.5.1. Existing Environment

A Preliminary Biodiversity Constraints Assessment was undertaken by ELA in June 2023. This included a preliminary desktop review and a site visit to verify desktop findings. The desktop review included:

- EPBC Act protected matters search, for MNES using a radius of 10 km around the site boundary (the study area).
- BioNet (Wildlife Atlas) search for threatened species/populations listed under the Biodiversity Conservation Act (BC Act) previously recorded within the study area (DPE 2023a (7 June 2023)).
- Threatened Biodiversity Data Collection or species likely to occur within or near the study area (DPE 2023b).
- BAM Important Habitat Mapping for Swift Parrot (DPE 2023c). (7 June 2023)
- NSW State Vegetation Type Map vegetation mapping (DPE 2022c).
- DPE Biodiversity Values Map in accordance with the BC Act (DPE 2023d (7 June 2023)).
- 1:25,000 hydro-line data (Natural Resource Access Regulator 2016).
- GLEP 2012.
- Greater Hume Development Control Plan 2013.
- Commonwealth, NSW, and local legislation planning instruments.

A PCT map as modelled by DPE 2022 is provided in Figure 20 below.

Figure 20 NSW State Vegetation Type Map (DPE 2022)



Source: Eco Logical, June 2023

A four-day field survey of the study area was undertaken by ELA on 13 to 16 June 2023. The following was undertaken throughout the study area:

- Identification of the extent and type of native vegetation and PCTs present, including native grass survey.
- Identification of broad condition states and classification of Vegetation Zones within the study area.
- Identification of any TECs
- Location of habitat features such as the presence of hollow-bearing trees, presence of rocks, large woody debris for threatened species in accordance with section 5.2.1 to 5.2.3 of the BAM.

PCTs were determined and validated based on the presence of diagnostic species via a rapid assessment and recording of dominant species within each stratum. A map of PCTs as identified by the field study was prepared by ELA (Figure 21).

The field survey undertaken by ELA in June was limited by the seasonality and flowering periods of several grass species in the area. Subsequently, AEP undertook further site surveys on 12th to 14th September 2023 to verify the grass species on site.

In total, 21 Rapid Data Point assessments and three (3) BAM plots were undertaken across the area initially designated as non-native. A revised map of PCTs as verified by AEP was prepared (Figure 22).

The following PCTs were validated on site in the Preliminary Biodiversity Constraints Assessments:

- PCT 266: White Box grassy woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion.
- PCT 277: Blakely's Red Gum - Yellow Box grassy tall woodland of the NSW South Western Slopes Bioregion.
- PCT 282: Blakely's Red Gum - White Box - Yellow Box - Black Cypress Pine box grass/shrub woodland on clay loam soils on undulating hills of central NSW South Western Slopes Bioregion.
- PCT 282: Blakely's Red Gum - White Box - Yellow Box - Black Cypress Pine box grass/shrub woodland on clay loam soils on undulating hills of central NSW South Western Slopes Bioregion. – Derived Native Grassland
- PCT 336: Rush - Sedge - Common Reed mainly lentic channel wetland of the Upper Murray and mid-Murrumbidgee River floodplains in the NSW South Western Slopes Bioregion
- Exotic pasture and cultivated lands.

PCT 266, PCT 277 and PCT 282 are listed as the Critically Endangered Ecological Community White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland in the NSW North Coast, New England Tableland, Nandewar, Brigalow Belt South, Sydney Basin, South Eastern Highlands, NSW South Western Slopes, South East Corner and Riverina Bioregions, hereafter referred to as 'Box Gum Woodland'. Further assessment undertaken by AEP concluded that PCT 282 DNG (as mapped by ELA in Figure 21) does not qualify as a TEC.

Figure 21 Plant Community Types (ELA, June 2023)

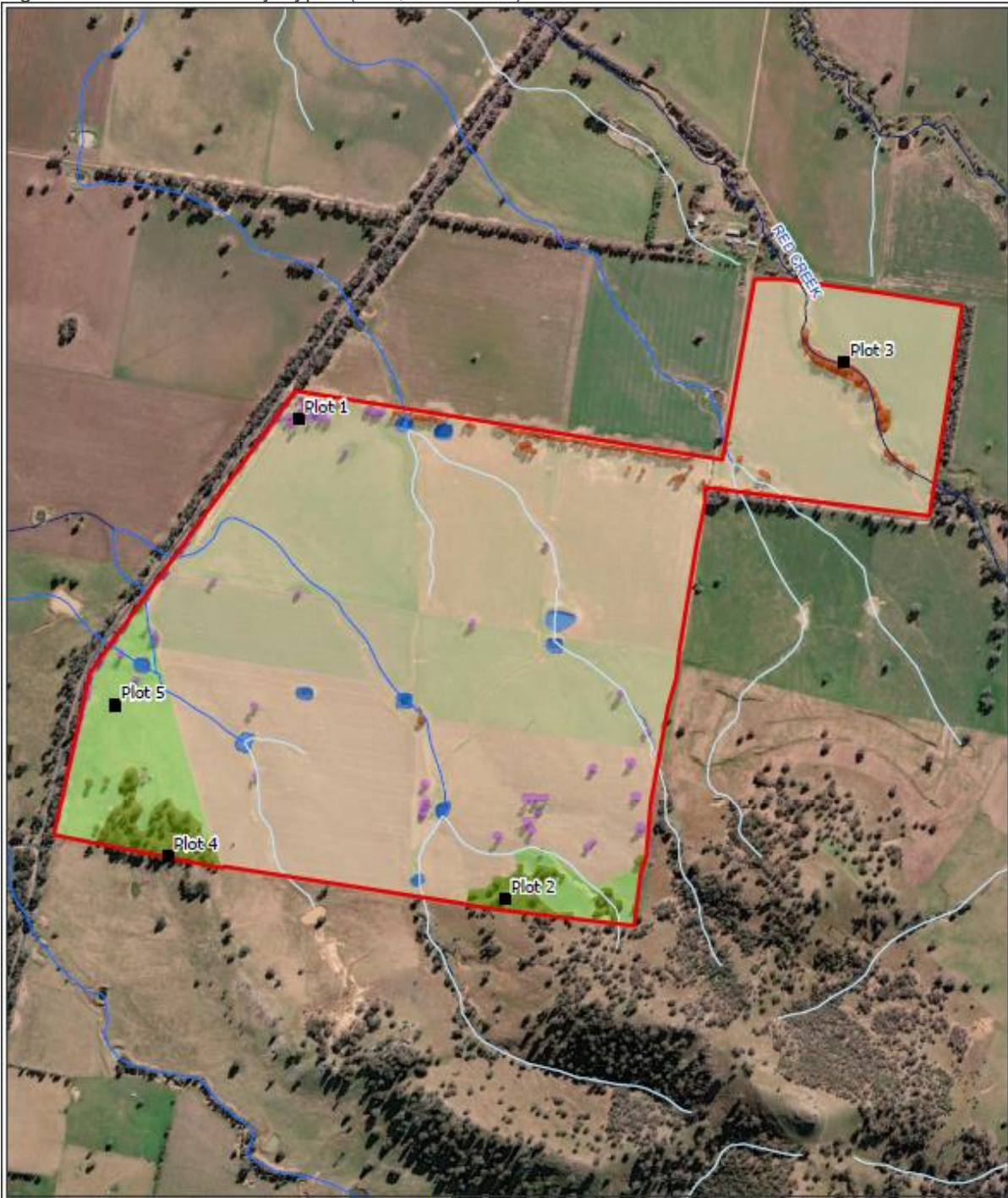


Figure 3. Plant Community Types (ELA 2023)

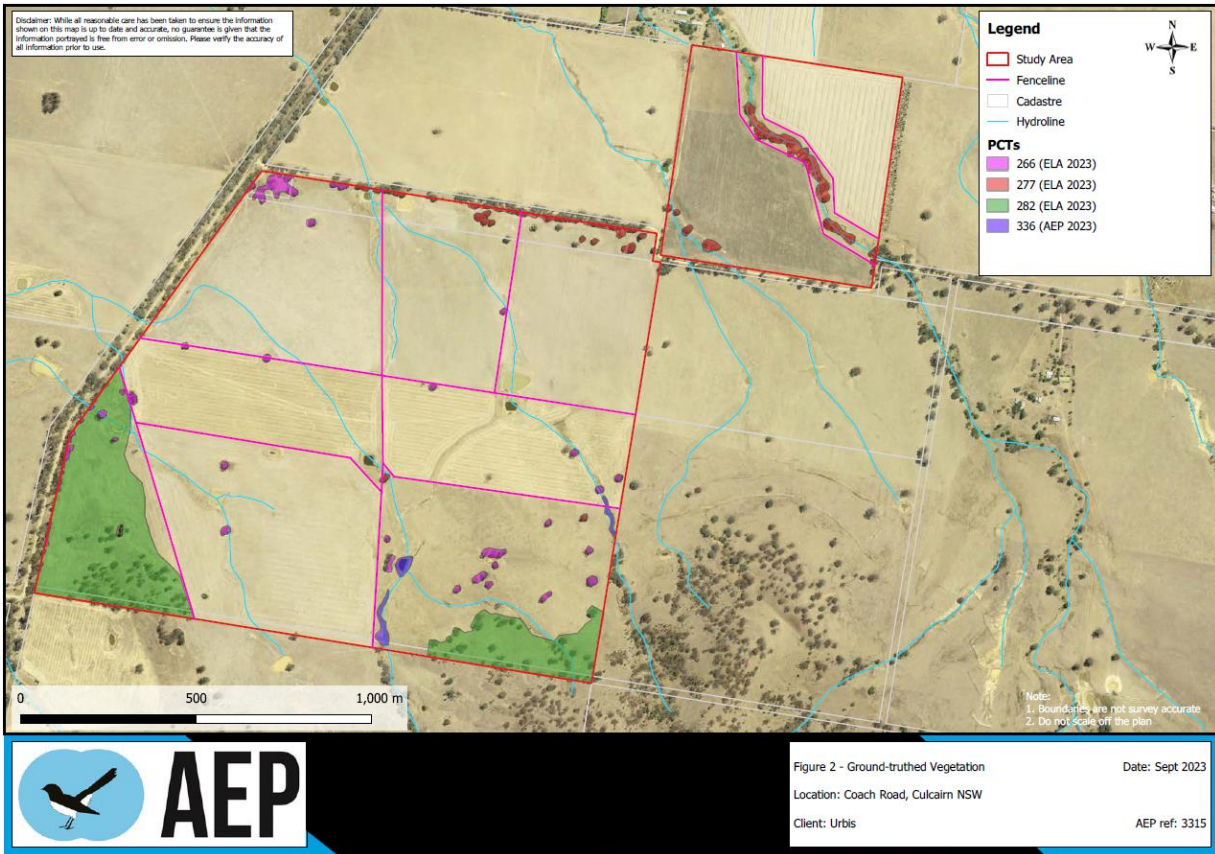
Gerogery Solar Farm

<ul style="list-style-type: none"> ▭ Study area ■ Biometric integrity plot location <p>Plant Community Types (ELA 2023)</p> <ul style="list-style-type: none"> ▭ PCT 266: White Box grassy woodland ▭ PCT 277: Blakely's Red Gum - Yellow Box grassy tall woodland 	<ul style="list-style-type: none"> ▭ PCT 282: Blakely's Red Gum - White Box - Yellow Box - Black Cypress Pine box grass/shrub woodland ▭ PCT 282: Blakely's Red Gum - White Box - Yellow Box - Black Cypress Pine box grass/shrub woodland - DNG ▭ Planted native shrubs 	<ul style="list-style-type: none"> ▭ Cleared/exotic ▭ Dam/watercourse <p>Strahler Stream Order</p> <ul style="list-style-type: none"> — 1st Order — 2nd Order — 3rd Order 	<p>0 125 250 500 Metres</p> <p>Datum/Projection: GDA 1994 MGA Zone 55</p> <p>Project: 23MELS563-EK Date: 6/22/2023</p>
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Source: Eco Logical, June 2023

Figure 22 Plant Community Types (AEP, September 2023)



Source: AEP, September 2023

ELA desktop review identified the habitat likelihood for 19 threatened flora and 39 threatened fauna species within the locality, most of which are likely to use the habitats within the study area opportunistically. There have been no threatened flora or fauna previously identified within the study area.

The field survey validated the habitat features within the study area. A number of habitat features was identified, these broadly included hollow bearing trees of varying sizes, large woody debris, exposed rocks, farm dams and ephemeral drainage lines. These areas are the dominant habitat for potential threatened species and will need to be further assessed through a more comprehensive survey.

The site is also considered potential koala habitat, which includes areas of native vegetation where trees listed in Schedule 1 of the Biodiversity and Conservation SEPP constitute at least 15% of the total number of trees. *Eucalyptus albens*, which was recorded across much of the study area, including being the dominant tree species within PCT 266, is listed as a feed tree species under Schedule 1. While no koala presence was recorded during the preliminary assessment, any succeeding assessments will have to include this matter.

One threatened fish species listed under the FM Act is modelled or expected to occur in the study area at Red Creek, being *Nannoperca australis* (Southern Pygmy Perch), listed as endangered under the FM Act. Red Creek is categorised as a *Key Fish Habitat*.

It is generally noted that the majority of the site can be categorised as highly modified farmland without ecological values as a result of continued intense agricultural practise.

6.1.5.2. Assessment Approach

A BDAR would be prepared by a suitably qualified specialist to complete a detailed assessment of potential biodiversity impacts resulting from the construction and operation of the Project in accordance with the BC Act.

The BDAR and all associated site investigations would be undertaken as per the BAM (DPIE, 2020). It is expected that the project will be referred to DCCEEW – BCS and that the project SEARs will address their requirements. A detailed assessment of the MNES will also be undertaken and included within the EIS, although an EPBC referral is not anticipated to be necessary.

It is expected that the BDAR will inform the concept layout and iterative refinements will be undertaken to avoid and minimise impacts on local biodiversity. Further proposed measures to avoid, minimise, mitigate, and offset will be included within the BDAR to ensure a nature positive outcome for the project. Cumulative impacts from other major projects on the regional ecosystem will be considered, including the extent of clearing to date and combined incremental impacts from different developments.

Consideration will be given within the BDAR to the Key Fish Habitat, which will include an aquatic ecological assessment that addresses all direct and indirect impacts of the development. The Aquatic Ecological Assessment should cover the assessment requirements outlined in Chapter 3 of the *Policy and Guidelines for Fish Habitat Conservation and Management* (2013), including an assessment of the potential loss of riparian vegetation and any indirect impacts.

6.1.6. Health, Hazards and Risks

6.1.6.1. Existing Environment

EMFs are associated with a wide range of sources and occur both naturally as well as man-made. Electric and magnetic fields are created due to differences in voltage and current flows respectively with the surrounding area. To eliminate any potential health impacts, the power frequency and electric and magnetic field exposure guidelines referenced by the Australian Radiation Protection and Nuclear Safety Agency will be considered as part of a hazard and risk assessment.

Some Dangerous Goods (as defined by the NSW Environmental Protection Agency), such as transformer oil or diesel fuel, may be required to be transported, stored, and used as part of the project construction and operational phase. These goods are industry-standard, ubiquitous in the wider economy, and will always be properly transported and handled; thus, it is expected that they will pose little to no risk to the surrounding environment.

The proponent is currently finalising the BESS equipment configurations. Specifications will inform a hazard and risk assessment.

6.1.6.2. Assessment Approach

A PHA would be prepared by a suitably qualified Risk Engineer to assess potential hazardous risks relating to the transport, storage and use of dangerous goods on site, including the presence of the BESS on the proposed location. The PHA will include consideration of the potential cumulative risks from other major projects within the catchment area, including similar-sized BESS. The PHA would be completed in accordance with the appropriate legislation and guidelines to be included within the EIS:

- Resilience and Hazards SEPP 2021.
- Multi-Level Risk Assessment Guidelines (DoP, 2011).
- Hazardous Industry Planning Advisory Paper No. 3 – Risk Assessment (DoP, 2011).
- Hazardous Industry Planning Advisory Paper No. 6 – Guideline for Hazard Analysis (DoP, 2011).
- Hazardous Industry Planning Advisory Paper No. 12 – Hazards-Related Conditions of Consent (DoP, 2011).

A qualitative standard assessment of EMF would be undertaken to be included within the EIS as part of the PHA. Although it is not expected that EMF levels will increase significantly as part of the development, the assessment would evaluate any potential residual electromagnetic field risks against the following International Commission on Non-Ionizing Radiation Protection Guidelines.

6.1.7. Social and Economic

6.1.7.1. Existing Environment

For the purposes of the Social Impact Assessment, the Project's social locality is defined as:

- The Project site and immediate surrounding areas, including landholdings, property owners and residents of associated dwellings and properties to be used for the Project area and any ancillary facilities, located within the Australian Bureau of Statistics (ABS) Statistical Area Level 1 (SA1) No. 10901117525 (containing the Project). SA1 data has been used to identify key baseline indicators for the social locality. This SA1 is the primary source providing details of the impacted community's defining

characteristics and is used to understand sensitive receivers (vulnerable groups) within the Project's immediate vicinity.

- Culcairn Suburb and Locality (SAL) and Albury-Wodonga Urban Centre and Locality (UCL) are the closest and most prominent localities to the Project, with accessibility via major highways. Due to its proximity to the project site, Culcairn would likely be the primary town providing goods and services to support its construction phase. Located approximately 8.5km north of the site, Culcairn town would be the key service centre of the Project construction workforce. Other smaller service centres include Morven, Gerogery, Walla Walla, and Mountain Creek.
- The host local government area (LGA) of Greater Hume Shire. LGA and state-level data for NSW will be used to understand the broader and comparative social context in which the Project will be located.

As the project planning progresses, the social locality may extend beyond these boundaries to include the places of residence of the future construction and operational workforce and where materials may be sourced for the Project. The social locality will be further refined during the EIS assessment phase.

The Project area's immediate surroundings comprise sparsely populated rural residential settlements, characterised by single-storey residential buildings on large lots, which include ancillary structures used for agricultural purposes such as sheds, silos, water tanks, livestock fencing, and solar panel installations (of a residential scale). Many properties include dams for livestock. Surrounding residential settlement patterns are disparate, whereas rural residential dwellings are widely dispersed. The closest dwelling – which is the landowners dwelling and not a neighbour – is 100 metres north of the Project site, with residential dwellings within 5km to the northeast, west and south of the site.

The Project site's immediate surroundings contain little social infrastructure and little to no commerce, with the closest services available at Culcairn. No public transport infrastructure or services connect directly to the site. The nearest public transport stop is Culcairn Station, which connects to Albury and Wagga Wagga by NSW TrainLink.

Gerogery's population in 2016 was 565, compared to 684 in 2021, which represents a 21% increase. Culcairn's population in 2016 was 1473, compared to 1483 in 2021, which represents a 0.7% increase (ABS 2016, 2021).

The area's demographic profile indicates a below-average median age population. The median age in the SA1 is 39, with 13% of residents in the 10-14 years age group and 7.5% in the 40-44 age group. The median age at Gerogery and Culcairn is 41 and 44 respectively. This suggests a younger demographic in the rural areas than the Culcairn town.

In 2021, the Aboriginal and Torres Strait Islander population was similar at 3.4% for the Greater Hume LGA and notably higher at 5.4% in Culcairn town compared to the state of NSW (3.4%).

While there is some cultural diversity with some of the population born overseas, the Culcairn town (5.5%) and the Greater Hume LGA (6.6.%) population are less culturally diverse than NSW (34.6% of the population born overseas). The population born overseas is the lowest (3%) in the SA1 rural areas.

The top languages other than English include Fijian, Auslan, Maori (New Zealand), Polish, Japanese, German, Dutch, Spanish and Arabic.

In a wider regional context, the larger population centre relative to the Project is the urban area of Albury-Wodonga, approximately 37 kilometres south of the site with a combined population of 97,793 people and a 4.6% unemployment rate.

The latest unemployment data pertaining to the social locality is as follows (ABS, 2021):

- Of the 11,157 residents in the LGA, the labour force accounts for 57.8%. There are 150 (2.9% of the labour force) unemployed workers.
- Of the 1,483 residents in the Culcairn SAL, the labour force accounts for 52.1%. There are 28 (4.6% of the labour force) unemployed workers.
- Of the 684 residents in Gerogery, the labour force accounts for 62.9%. There are 10 (3.0% of the labour force) unemployed workers.
- Of the 365 residents in the SA1, the labour force accounts for 72.5%. There are 0 (0.0% of the labour force) unemployed workers.

The median weekly household income is highest in the Greater Hume LGA (\$1,368), followed by the SA1 (\$1,149) and the Culcairn SAL (\$1,062). This suggests that Culcairn SAL is slightly economically disadvantaged compared to NSW, where the median weekly household income is \$1,558.

Potentially Impacted Stakeholders

Early stakeholder consultation between May and July 2024 included engagement with adjoining landowners and the broader community and provided a preliminary understanding of stakeholder concerns. The engagement outcomes have been used to inform further the scoping of likely social impacts with critical issues of concern. Potential project-related social impacts and benefits were discussed with the Greater Hume Shire Council in phone calls and in-person meetings to gain some preliminary understanding of the local context. Given the Project's preliminary nature, most of the feedback received during the early consultation phase came from the Council.

Table 12 includes the stakeholders who might be interested in the Project and potential areas of interest and concern relevant to the social impact assessment. It is recommended that these stakeholder groups be engaged to inform the detailed SIA for the Project. Refer to Appendix B for a list of stakeholders and a description of consultation outcomes.

Table 12 Project stakeholders and potential areas of interest/concern

Stakeholder group	Potential interest/concerns
Adjoining landowners	Adjoining landowners were identified with the landowner of the Project site and based on likely impact or interest during construction and operation. These likely impacts and/or areas of interest were identified as: <ul style="list-style-type: none"> ▪ Increased traffic and impact on local road conditions (during construction). ▪ Visual impacts (including changes to visual amenity glint and glare). ▪ Environmental impacts (including weed/land management during operation). ▪ Construction impacts including noise, vibration and dust. ▪ Operational impacts, such as maintenance.
Residents and businesses within the suburbs of Culcairn, Walla Walla, Moven, Mountain Creek and Gerogery.	Discussions on the Project, updates, impacts of Project construction and operation, stakeholder consultation, community well-being and benefit-sharing initiatives, impacts on property values and local amenities, economic benefits, and job creation opportunities.
Traditional owners	Potential impacts to cultural heritage values. Management of local Indigenous values. Procurement related opportunities
Interest groups and community services and facilities.	Project construction and operation impacts, impacts on local roads and community infrastructure, increased workforce, and project opportunities, including training opportunities.
Local industry, tourism, business, and agricultural organisations	Economic growth and opportunities, impact on farming operations and agricultural land, supply and contract opportunities, employment and training opportunities, economic impacts, job and revenue creation opportunities, and local business activation.
Federal, State, and Local government	The Greater Hume Community Strategic Plan 2017 - 2030 (Greater Hume Shire 2017) identifies the community's priorities and aspirations for the future. The Project would align with the principles of the Community Strategic Plan, specifically in its support for economic development. Potential benefits to the community would include significant economic stimulus to the area, working opportunities, and agreements with the community. Greater Hume Shire Council has four key strategic themes in its Community Strategic Plan (CSP) 2017 - 2030 (Greater Hume Shire Council 2017). The Shire's vision for the future is: "Partnering to advance our rural communities." The plan identifies the community's main priorities and aspirations for the future. The four key themes include

Stakeholder group	Potential interest/concerns
	<ul style="list-style-type: none"> • <i>Theme 1 - Leadership and Communication</i> • <i>Theme 2 - Healthy Lifestyle</i> • <i>Theme 3 - Growth and Sustainability</i> • <i>Theme 4 - Good Infrastructure and Facilities</i> <p>The Project meets the CSP's aspirations, particularly regarding growth and sustainability, "growing our economy and promoting the culture and heritage offered in our communities."</p> <p>The capability and suitability of the local workforce have been discussed with the Greater Hume Shire Council to understand how the local workforce could be integrated during the construction and operation of the project. Discussions with the Council further covered its preference for a Community Benefit Scheme – points raised with the Council included existing practice, a preferred governance model, possible implementation strategies, financial contributions, VPA arrangements, and types of projects likely to be funded as part of the Community Benefit Scheme.</p> <p>The Council raised matters about environmental constraints, waste management during decommissioning, development contributions, the planning agreement, and socio-economic considerations that could potentially positively or negatively impact the community.</p> <p>The Council advised that these conversations should be continued once the Project has received SEARs.</p>
Emergency services	Project impacts, community access to services and road access in an emergency, bushfire mitigation and increased service demand by an increased workforce, construction impacts on health and safety, training opportunities, and safety plans.

Initial evaluation of the likely impacts

Table 13 summarises the social impacts (positive and negative) in relation to the Project following the social impact categories outlined in the Social Impact Assessment Guideline for State Significant Projects (Department of Planning and Environment DPE, February 2023), The impacts have been identified through preliminary desktop assessment and are further described in the Scoping Worksheet Appendix C.

Table 13 Preliminary impact evaluation

Social impact categories	Affected stakeholder group	Likely social impact	Level of assessment
Way of life	Broader Community	Improved reliability and security of the State and National electricity network by generating electricity from renewable sources and feeding it into the grid for national transmission. The Project would assist in transitioning away from fossil fuels and decentralising the energy grid, increasing the network's resilience against blackouts, price shocks, and supply chain dependencies.	Detailed
Livelihoods	Broader Community	There is an opportunity for the Project to increase the training, skills, and capacity development of individuals and provide employment opportunities for Culcairn town residents.	Standard
Livelihoods	Broader community, service providers	Positive livelihood impacts are linked to the potential increased involvement of local suppliers, services and contractors, and procurement opportunities, which would, therefore, improve the regional economy.	Detailed
Community	Broader community, service providers	Opportunity for the Project to foster investment in community benefit-sharing programs, which could lead to positive community and livelihood impacts	Detailed

Social impact categories	Affected stakeholder group	Likely social impact	Level of assessment
Livelihoods	Traditional Owners, broader community, vulnerable community groups	The Project would increase local employment opportunities, including for First Nations people. This would help diversify the local economy, provide a long-term income stream for the community, and enhance the development of skilled workers.	Detailed
Decision-making systems	Proximal landholders, Broader community	Heightened sensitivity (legacy issues) due to a perceived lack of consultation.	Detailed
Surroundings	Proximal landholders, Broader community	Potential for stakeholder concerns around the project lifespan and decommissioning, including fears of environmental degradation including, for example, removal of waste, recycling, and site remediation of Project Infrastructure	Standard
Livelihoods	Proximal landholder (s)	Potential property impacts. Through consultation, stakeholders raised insurance queries and whether there is a risk that public liability will be increased due to living next to a solar farm.	Standard
Surroundings	Proximal landholder (s)	Potential biodiversity, amenity and sense of place impacts due to vegetation removal. Land clearing may be needed when the ancillary infrastructure and solar panels are installed. Although impacts may not be total during the installation of PV arrays, they are considered as such under current legal frameworks.	Detailed
Community	Proximal landholders, Broader community	Potential amenity impacts and potential bushfire threat due to glint and glare. Potential fire risks to property (including plan, livestock, and homes) and increased fire hazards associated with solar and BESS infrastructure.	Detailed
Surroundings	Broader community Emergency services	Electrical equipment can pose a risk (actual or perceived) to bushfire protection or even induce a fire in some situations. Potential fire risks to property (including plan, livestock, and homes) and increased fire hazards associated with solar and BESS infrastructure. Through consultation, stakeholders indicated that the area is prone to lightning, and there is a lack of fire trails being maintained within the Hills / National Park.	Detailed
Surroundings	Proximal landholder (s)	Temporary construction facilities include a construction compound, laydown area(s), construction materials storage, and site office buildings and amenities. Additional ancillary infrastructure includes perimeter fencing, landscaping, and perimeter treatments (including bushfire asset protection zones). Permanent supporting infrastructure, including internal access tracks, security fencing and lighting, operations and maintenance buildings, and operational vehicle access points.	Detailed
Health and wellbeing	Proximal landholders, broader community	Social amenity impacts due to noise potentially affecting personal wellbeing. BESS and Inverters may generate noise during operation that may impact the amenity of potential sensitive receivers.	Detailed
Livelihoods	Broader community	Approximately 150 on-site staff are likely to be required during the peak construction phase. Potential wage spending may be directed at local businesses and service providers during construction. Spending may include housing, retail, recreational, personal, medical, and other services.	Detailed
Livelihoods	Local business	Increased consumption and utilisation of local services by construction workers may lead to increased local prices or a shortage of commodities.	Detailed

Social impact categories	Affected stakeholder group	Likely social impact	Level of assessment
Livelihoods	Local business	Increased demand for long-term accommodation can conflict with the local tourism and real estate industries and, if unmitigated, cause a price shock.	Detailed
Livelihoods	Host and proximal landholders, including for ancillary infrastructure	Potential concerns and perceived negative impacts around industrialisation of the landscape impact how people use their land and, therefore, their livelihoods. Potential impacts on the land / agricultural land quality because of the solar panels.	Detailed
Surroundings	Proximal landholders	Impacts on soil during construction and operation may limit water and nutrient availability for agricultural practices, potentially depressing property values and impacting personal livelihoods.	Detailed
Surroundings	Proximal landholders, broader community	Visual amenity changes impacting the rural landscape. Impacts on visual and social amenities due to project siting.	Detailed
Access	Proximal landholders	Transport vehicles, including oversized transport vehicles, B-doubles, and heavy rigid trucks, will transport large plant materials, raw materials, and smaller plant materials to the site, collect waste, and lay foundations.	Detailed
Livelihoods	Host and proximal landholders, including for ancillary infrastructure	Potential impacts to site access to the adjoining landowner with cattle crossing Jobsons Road regularly. This cannot be impacted as part of the proposed solar farm. Jobsons Road is frequently used by neighbours (including for crossing cattle), and Coach Road has limits for heavy vehicles.	Detailed
Culture	Traditional Owners, broader community	Disturbance during construction of potential Aboriginal artifacts and sites, especially where bulk earthworks are required. Red Creek and several unnamed water lines traverse the site, which can increase the possible presence of Aboriginal items and sites. However, the site has been used for agricultural purposes for the past century. The site is being used now for sheep grazing. The Project site is in proximity to waterways, including Billabong Creek. Therefore, Aboriginal objects may also occur within the subject area.	Detailed
Livelihoods	Host and proximal landholders	Potential decline in property values impacting personal livelihoods.	Standard
Surroundings	Host and proximal landholders, broader community	Through consultation, stakeholders raised enquiries about glint and glare and whether neighbours and people driving past the solar farm on Coach Road and Jobsons Road will be impacted.	Standard
Surroundings	Host and proximal landholders, including for ancillary infrastructure	Land clearing may be needed when the ancillary infrastructure and solar panels are installed. Stakeholders might be concerned about impacts on the site's biodiversity due to the solar farm. During the stakeholder consultation activities, stakeholders indicated they would like to see Elgin explore options to improve and prioritise land quality and farming options through this process.	Detailed
Access	Broader Community, Service Providers, Vulnerable community groups	Potential traffic, transport, and road safety impacts associated with construction activities and increased numbers of large vehicles on the road network may lead to increased collision risks, damage to road infrastructure, associated noise and dust, and a reduction of the level of service on the road network caused by 'platooning' of construction traffic.	Detailed
Livelihoods	Broader community, Service providers	The Project can potentially enhance the local economy's resilience to financial stressors during the construction and operational phases.	Detailed

6.1.7.2. Assessment Approach

A Social Impact Assessment (SIA) report will be provided within the EIS to assess potential social impacts arising from the construction and operation of the Project. The SIA will be prepared in accordance with the Social Impact Assessment Guideline for State Significant Projects (Department of Planning and Environment DPE, February 2023), hereinafter referred to as the SIA Guideline, and the Technical Supplement Social Impact Assessment Guideline for State Significant Projects (DPE, 2023) and their objectives and requirements.

The detailed assessment of social impacts must be informed by stakeholder consultation, as required by the SIA Guideline. Early stakeholder engagement has occurred with nearby landowners and the Council. Stakeholders have shared concerns about local amenity, environmental and biodiversity impacts, property devaluation, and limited ability to influence the Project decision-making. Potential social impacts during the construction phase could include stress on regional and social infrastructure and services, such as accommodation.

Potential benefits to the community could include significant economic stimulus to the area, working opportunities, and agreements with the community.

Constructive conversations with Council will be continued during the EIS phase. It is recommended that the identified social impacts be ground-truthed, supplemented by stakeholder engagement, and reviewed against any changes associated with further project design development as part of a detailed social impact assessment.

Overall, the potential adverse amenity, livelihoods, and way of life impacts potentially arising from the Project's construction and operation in the social locality can be well managed and mitigated through robust construction and environmental management plans and other control measures, including transparent and proactive consultation with the local community.

Furthermore, it is recommended that targeted consultation occurs with representatives from the relevant Local Aboriginal Land Council (LALC). Stakeholder consultation must continue through project planning, design, and delivery to identify social impacts, mitigation measures and opportunities to enhance the Project's positive impacts. Targeted First Nations engagement would enable the project to manage any perceived and actual impacts on Aboriginal cultural heritage items and values.

Further engagement with the local community is recommended to inform the Project and social outcomes. Ongoing participation agreement discussions with neighbouring properties would assist in addressing any concerns and perceptions about social impacts.

As part of the EIS, future stages of the socio-economic impact assessment for this Project would include a detailed prediction and assessment of positive and negative impacts. Informed by stakeholder consultation, a detailed Social Impact Assessment would identify relevant strategies to mitigate the Project's negative impacts and opportunities to enhance its positive impacts. It is recommended that subsequent phases of the SIA program involve the following key activities:

- Validation of the social locality and update of the baseline social profile to facilitate a detailed assessment of social impacts against existing baseline conditions.
- Validation of affected stakeholders, communities and vulnerable groups.
- Inform stakeholders about opportunities to provide feedback on the outcomes of the issues raised in the scoping phase.
- Once these are issued, communication of the Project's SEARs and information about further opportunities to provide input.
- Further engagement with community members, including Traditional Owners and other key stakeholders on key social impact areas.
- Opportunities for input to develop appropriate management and enhancement measures to address social impacts.

6.1.8. Water

6.1.8.1. Existing Environment

The site is relatively flat, gently sloping towards Red Creek in the northeast. The highest elevation of the site is approximately 310m AHD on the southern part of the site. The lowest elevation of the site is approximately 280m AHD near Red Creek on the northeast.

Red Creek is categorised as a Strahler order 3 and a Key Fish Habitat as mapped by DPI Fisheries 2022 under the *F*. Current mapping suggests there are four unnamed, nonperennial watercourses. It is noted that during site visits, there was only limited visible evidence of these waterways. Approximately 10 small dams are scattered across the site.

There are five different Flood Studies near the area, none of which cover the site:

- Flood Study for Culcairn.
- Flood Study for Henty.
- Flood Study for Holbrook.
- Flood Study for Jindera.
- Flood Study for Walla Walla.

There are 14 groundwater bores within four kilometres of the site (**Table 14**).

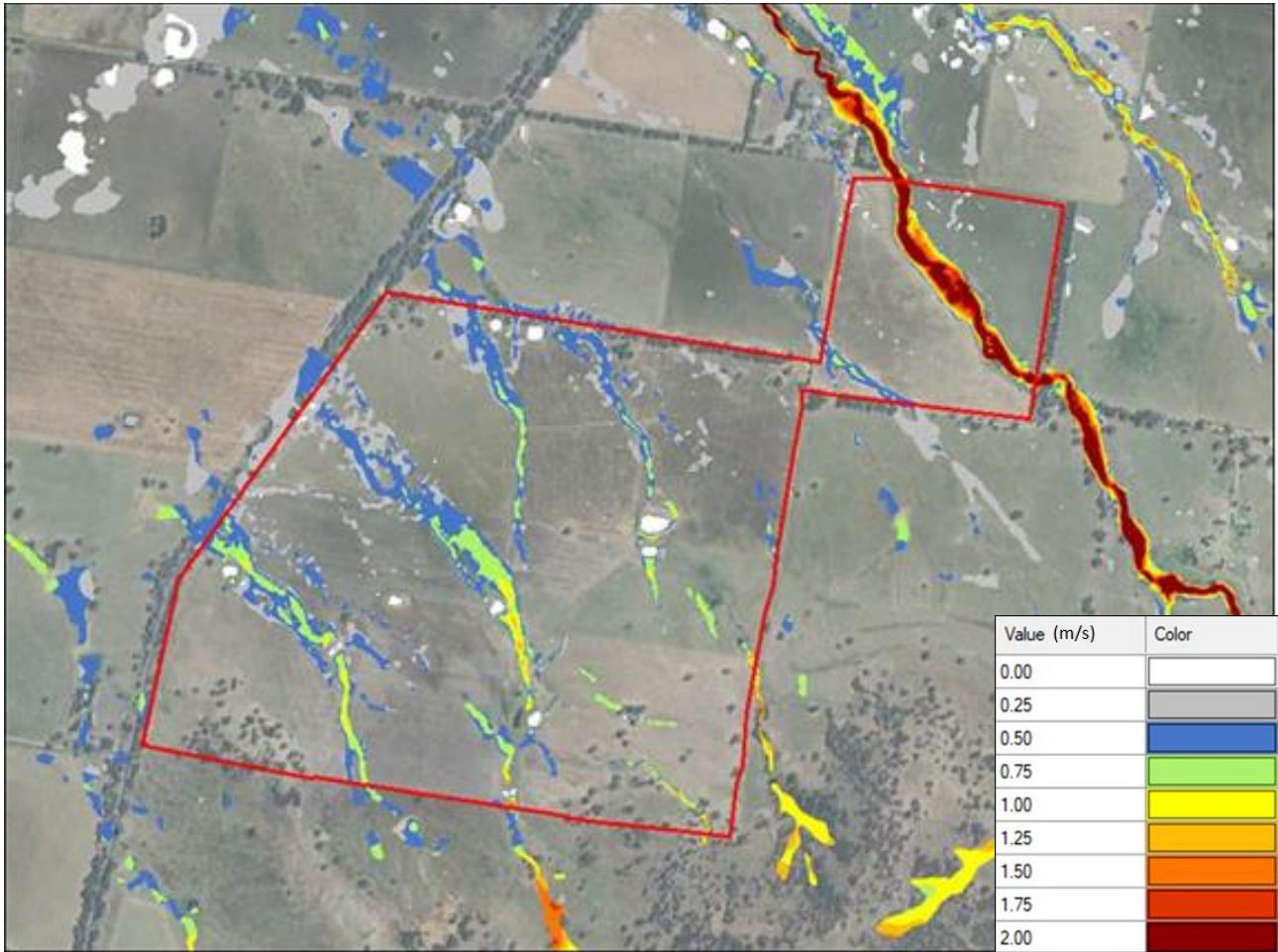
Table 14 Groundwater Bore Data

Site ID	Drilled Date	Bore Depth (m)
GW032579	1968-01-01	129.5
GW020041	1962-02-01	5.2
GW028258	1966-04-01	3.1
GW500703	1998-02-26	108.0
GW024766	1968-01-01	120.4
GW033588	1968-01-01	65.2
GW103427	1998-02-02	92.3
GW005332	1913-03-01	36.6
GW500082	1996-09-18	48.7
GW503161	2004-02-02	133.0
GW058631	1983-01-01	N/A
GW504463	2010-05-27	90.0
GW103429	1994-10-15	88.3
GW055559	1980-09-01	25.3
Average Bore Depth		72.74

Source: MinView, 2024

A Preliminary Flooding Impact Assessment was undertaken by ELA in June 2024. For all target Annual Exceedance Probability scenarios (10%, 1%, 0.5%, 0.2%, and 0.1%) overland sheet flow velocity within the site was typically less than 0.1 m/s. The greatest velocities and flooding depths were only expected to occur within Red Creek. Flow velocities may reach up to 1.5 m/s in isolated areas but remain below the 2 m/s threshold at which erosion protection is required (Figure 23).

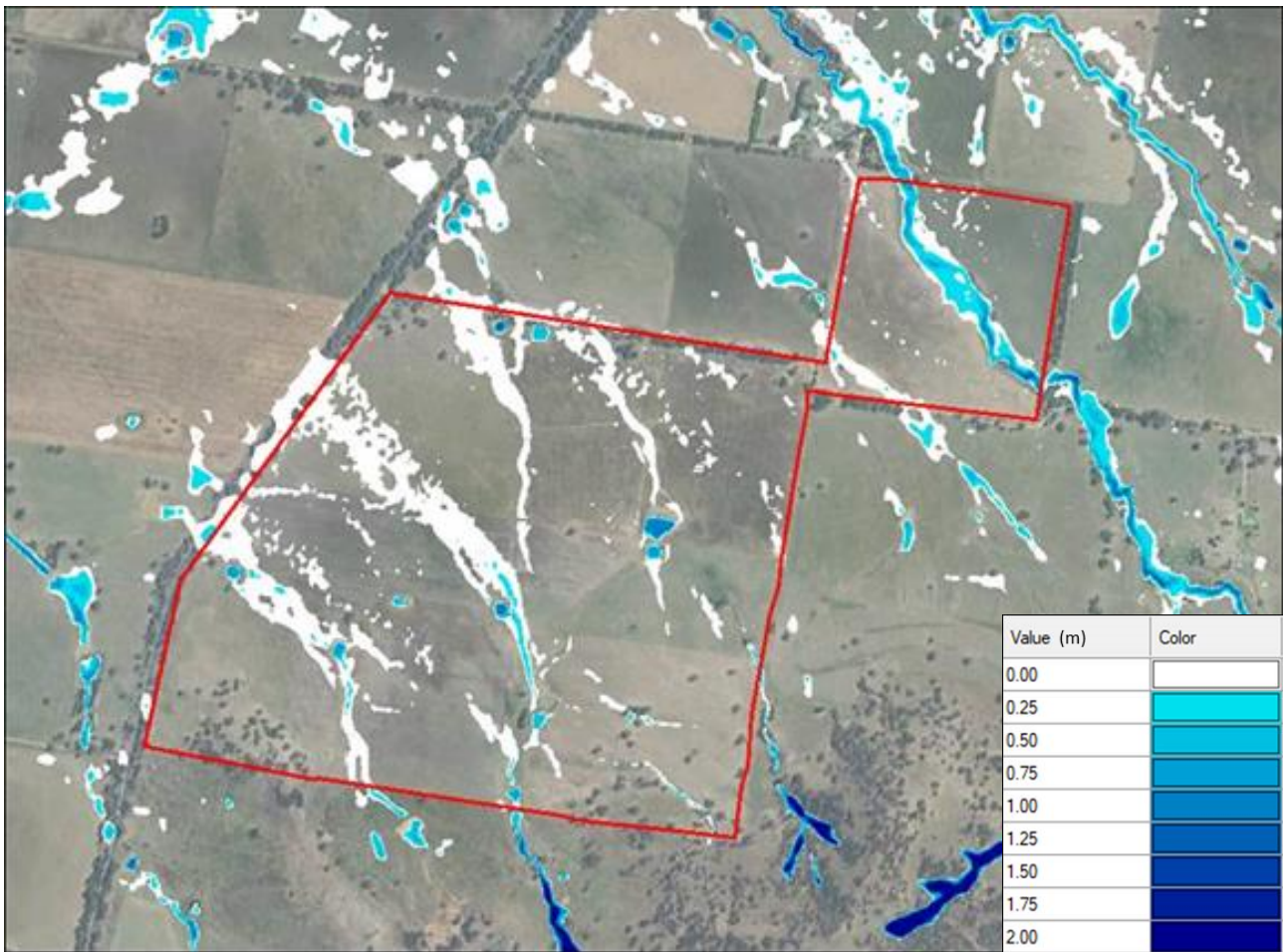
Figure 23 Maximum Flow Velocities 0.1% AEP



Source: Eco Logical, 2024

Maximum flood depths at the rest of the site are not expected to affect PV arrays considering stand height will likely exceed 0.3 in the majority of the site (Figure 24). Consequently, flow paths and downstream impacts are likely to be unaffected by the development, subject to detailed design. In addition, it is anticipated that the BESS and Substation will sit outside flow paths.

Figure 24 Maximum Flow Depths 0.1% AEP



Source: Eco Logical, 2024

6.1.8.2. Assessment Approach

Following the desktop review of the existing environment, it is considered unlikely that any groundwater impacts can be anticipated, given the average depth of surrounding boreholes.

The Hydrology Assessment will include careful evaluation of the presented flooding results against the *NSW Flood Risk Management Manual* (DPE, 2023), as well as an assessment against *Guidelines for Controlled Activities on Waterfront Land* (DPI, 2018) and provide design recommendations for the avoidance of impacts and mitigation measures where necessary.

Further assessment will validate and confirm the hydrological and ecological impact of the four unnamed, nonperennial watercourses.

Furthermore, the Hydrology Assessment will be taken in accordance with the following resources to ensure that Fish Habitat Conservation and Management is appropriately considered during the design, construction, and management and to avoid, minimise and mitigate any potential impacts on Key Fish Habitat:

- *Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings* (DPI 2003)
- *Policy & Guidelines for Fish Habitat Conservation & Management* (DPE, 2013)

The Hydrology Assessment will also evaluate any potential impacts to water quantity and quality on surface and groundwater resources. This will include careful consideration of the *Managing Urban Stormwater: Soils & Construction* (Landcom, 2004) and the *Australian and New Zealand Environment and Conservation Council & Agriculture and Resource Management Council of Australia and New Zealand (2000)* guidelines to ensure avoidance or minimisation of land degradation and water quality impacts, including soil erosion, compaction, geomorphic instability, contamination, acidity, waterlogging, a decline of native vegetation or, where appropriate, salinity. Consideration will be given to the cumulative impact of other projects on the

regional hydrology catchment, including potential downstream and upstream effects on water quantity and quality.

6.1.9. Land Capability

6.1.9.1. Existing Environment

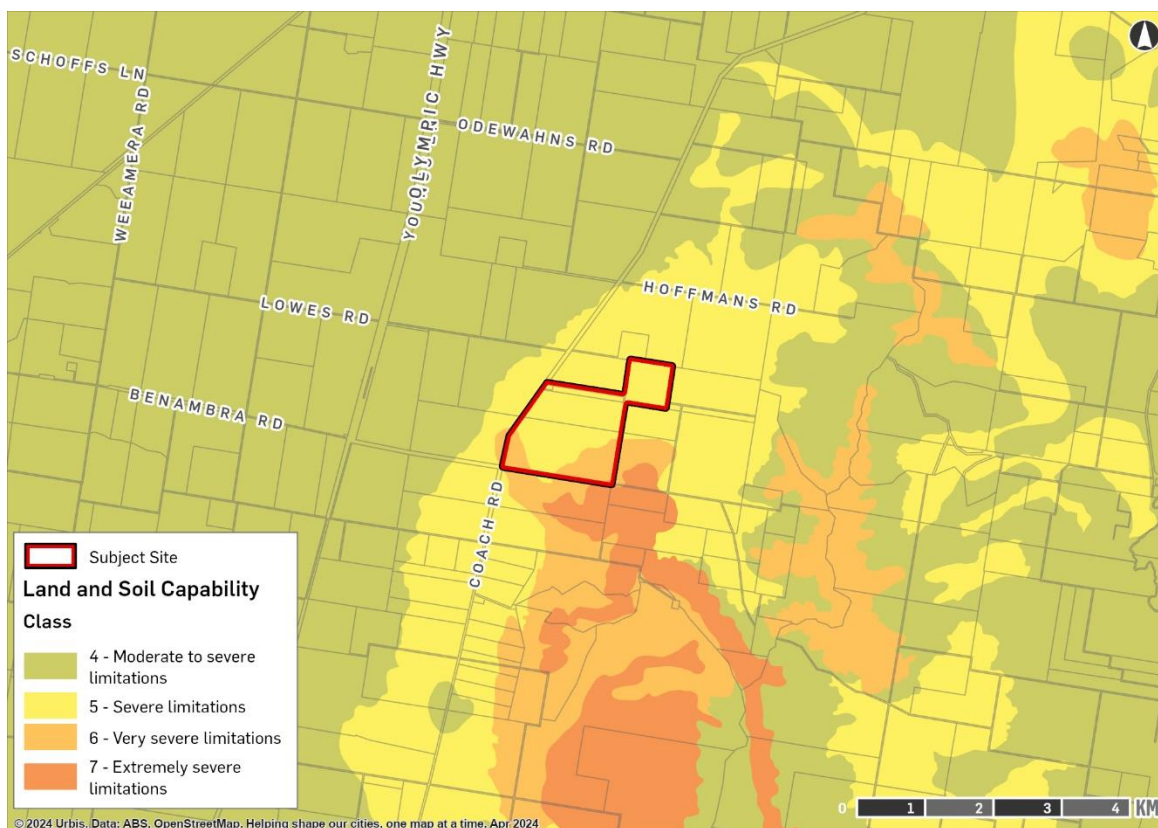
The LSC assessment scheme (OEH, 2022) evaluates the inherent physical capability of the land to sustain a range of land uses and management practices in the long term without degradation to soil, land, air and water resources.

The LSC assessment scheme uses the biophysical features of the land and soil including landform position, slope gradient, drainage, climate, soil type and soil characteristics to derive detailed rating tables for a range of land and soil hazards. These hazards include water erosion, wind erosion, soil structure decline, soil acidification, salinity, waterlogging, shallow soils and mass movement. Each hazard is given a rating between 1 (best, highest capability land) and 8 (worst, lowest capability land). The final LSC class of the land is based on the most limiting hazard.

A preliminary review of the LSC Mapping data for NSW (DPIE, 2021) suggests that the majority of the Project area is within LSC Class 5 – *Severe Limitations*, with some southern portions of the subject site being within LSC Class 6 – *Very Severe Limitations* (Figure 25).

A search of the Australian Soil Classification Soil type Map of NSW (DPE, 2017a) indicates that the site is comprised largely of Kurosols, generally considered to have very low agricultural potential and aligning with the LSC 5 parts of the site, and Kandosols, considered to have low to moderate agricultural potential and aligning with LSC 6 parts of the site.

Figure 25 Land and Soil Capability Map



Source: Urbis, 2024

A review of the BSAL data (DPE, 2013) showed that the site does not contain any BSAL areas, nor there are any BSAL areas in close proximity to the site. The site does not contain either any land mapped via the draft State Significant Agricultural Land map (DPI, 2022).

No exploration and mining titles or respective applications are located at the Project site boundary.

6.1.9.2. Assessment Approach

Appendix A of the *Large-Scale Solar Energy Guideline* (DPIE, 2022) facilitates direction to determine whether or not an Agricultural Impact Assessment is required, and the level of assessment needed in case it is required.

As the Project Area and its vicinity are zoned RU1, are not mapped BSAL, are mapped as LSC Class 5, and adjacent land is not mapped LSC Class 4 or below, a Level 1 Basic Assessment will be required.

The Level 1 Assessment undertaken for the Morven Solar Farm will:

- Present LSC mapping.
- Include consultation with neighbouring landholders to identify potential project impacts (if any) on immediately adjacent land.
- Describe project impacts (if any) on immediately adjacent land.
- Describe consultation undertaken.
- Consider measures to reduce impacts on neighbouring agricultural land.

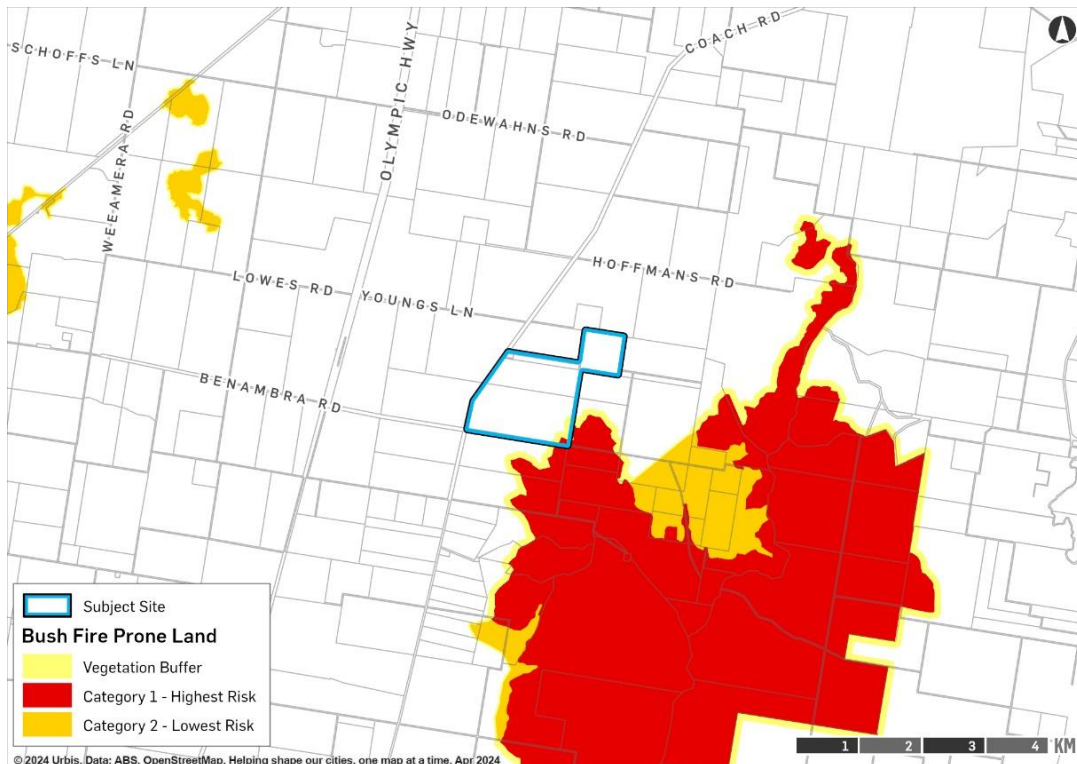
As per Figure 4 of Appendix A of the Guidelines, neither a site verification nor a soil survey is required for the site. Any potential cumulative impacts, such as significant loss of combined agricultural land from other major projects in the catchment area will also be considered.

6.1.10. Bushfire

6.1.10.1. Existing Environment

A small portion of the south-eastern part of the site is included in Category 1 – Highest Risk of the Bushfire Prone Land Map as published by NSW Rural Fire Service (Figure 26).

Figure 26 Bushfire Prone Land Map



Source: Urbis, 2024

6.1.10.2. Assessment Approach

A Bushfire Risk Assessment will be undertaken by an appropriately qualified specialist to be included in the EIS. At a minimum, the Bushfire Risk Assessment will include:

- Appropriate Asset Protection Zones (APZs) across the site.
- Design Considerations for bushfire protection according to the assessed Bushfire Attack Level.
- Ongoing management practices to ensure a decreased bushfire hazard level.

6.2. MATTERS REQUIRING STANDARD ASSESSMENT IN THE EIS

6.2.1. Waste

A Waste Management Plan will be prepared to be included within the EIS in accordance with the *Large Scale Solar Guidelines*. It is proposed that the Waste Management Plan would identify, quantify and classify the likely waste stream to be generated during construction and operation in accordance with the Waste Classification Guidelines (NSW EPA 2014).

The Waste Management Plan would also define measures to be implemented to manage, reuse, recycle and safely dispose of this waste, including appropriate waste management practices within the decommissioning phase according to the local and regional context.

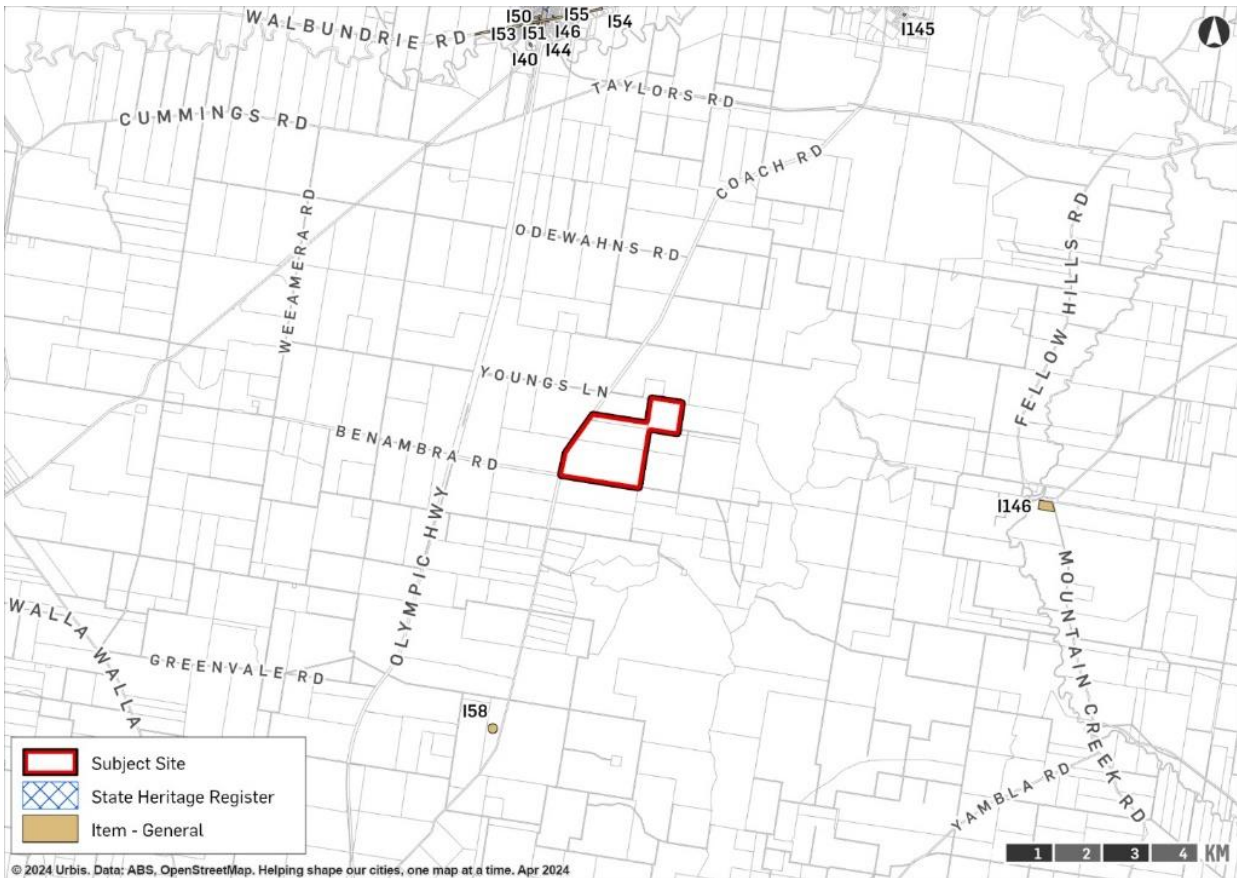
6.3. MATTERS REQUIRING NO FURTHER ASSESSMENT IN THE EIS

6.3.1. Historical Heritage

6.3.1.1. Existing Environment

A review of the GLEP 2012 and State Heritage Register reveals that there are no known Historical Heritage Items within four kilometres of the site (Figure 27).

Figure 27 State and Local Heritage Items Map



Source: Urbis, 2024

6.3.1.2. Assessment Approach

As there are no historical heritage items within or in close proximity to the site, it is proposed that no historical heritage impact assessment is required within the EIS.

7. CONCLUSION

This Scoping Report has been prepared on behalf of Elgin and in support of a proposed Large-Scale Solar Farm at 1258 Coach Road, Culcairn. This Scoping Report has outlined and established the planning and general environmental context of the Proposal. The Proposal would be assessed under Part 4 of the EP&A Act and classed as SSD under the Planning Systems SEPP.

The Scoping Report has categorised the potential environmental impacts of the proposed Project as key issues or other issues. Based on this Scoping Report, an indicative scope for the EIS has been developed, focusing on the key issues:

- Access – traffic and transport
- Aboriginal cultural heritage
- Amenity – visual
- Amenity – noise
- Biodiversity
- Hazards and risks
- Social and economic impacts
- Water
- Land capability
- Bushfire
- Waste.

The EIS will be prepared in accordance with the specific SEARs. Mitigation measures will be developed for inclusion in the EIS and will address the management of key issues and other issues identified in the assessment and community and stakeholder engagement process.

DISCLAIMER

This report is dated August 2024 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Elgin (**Instructing Party**) for the purpose of Scoping Report (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A SCOPING SUMMARY TABLE

Table 12 Scoping Summary Table

Level of assessment	Matter	CIA	Engagement	Relevant government plans, policies and guidelines	Scoping report reference
Detailed	Traffic and Access	Y	General	<ul style="list-style-type: none"> ▪ Guide to Traffic Management Part 12, Australian Standards (Austroads, 2020) and any complementary TfNSW Supplements ▪ Roads and Maritime Guide to Traffic Generating Developments (Roads and Traffic Authority, 2002) 	Section 6.1.1
Detailed	Aboriginal Cultural Heritage	Y	Specific	<ul style="list-style-type: none"> ▪ NSW National Parks and Wildlife Act 1974 (NSW Government) ▪ Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011). ▪ Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW (DEECCW, 2010). ▪ Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW 2010a) 	Section 6.1.2
Detailed	Amenity – Landscape and Visual	Y	General	<ul style="list-style-type: none"> ▪ Technical Supplement to the Large-Scale Solar Energy Guidelines (DPHI, 2022) 	Section 6.1.3
Detailed	Amenity – Noise	Y	General	<ul style="list-style-type: none"> ▪ Interim Construction Noise Guideline (NSW Department of Environment and Climate Change, 2009) ▪ NSW Noise Policy for Industry (NSW Environment Protection Authority, 2017) 	Section 6.1.4
Detailed	Biodiversity	Y	Specific	<ul style="list-style-type: none"> ▪ Biodiversity Conservation Act 2016 (NSW Government) ▪ Biodiversity Assessment Method (DPIE, 2020) ▪ Policy and Guidelines for Fish Habitat Conservation and Management (Department of Primary Industries, 2013) 	Section 6.1.5

Level of assessment	Matter	CIA	Engagement	Relevant government plans, policies and guidelines	Scoping report reference
Detailed	Hazards and Risks	Y	General	<ul style="list-style-type: none"> ▪ Resilience and Hazards SEPP 2021 (NSW Government) ▪ Hazardous Industry Planning Advisory Paper No. 3 – Risk Assessment (DoP, 2011). ▪ Hazardous Industry Planning Advisory Paper No. 6 – Guideline for Hazard Analysis (DoP, 2011). ▪ Hazardous Industry Planning Advisory Paper No. 12 – Hazards-Related Conditions of Consent (DoP, 2011). 	Section 6.1.6
Detailed	Social and Economic	Y	Specific	<ul style="list-style-type: none"> ▪ Social Impact Assessment Guideline (DPE, 2021) ▪ Technical Supplement Social Impact Assessment Guideline for State Significant Projects (DPE, 2023) 	Section 6.1.7
Detailed	Hydrology and Flooding	Y	General	<ul style="list-style-type: none"> ▪ Guidelines for Controlled Activities on Waterfront Land (DPI, 2018) ▪ Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (DPI, 2003) ▪ Policy & Guidelines for Fish Habitat Conservation & Management (DPE, 2013) ▪ Managing Urban Stormwater: Soils & Construction (Landcom, 2004) 	Section 6.1.8
Detailed	Soils and Land Capability	Y	General	<ul style="list-style-type: none"> ▪ Large-Scale Solar Energy Guideline (DPIE, 2022) 	Section 6.1.9
Detailed	Bushfire	Y	General	<ul style="list-style-type: none"> ▪ Planning for Bushfire Protection (NSW Government and NSW Rural Fire Service, 2019) 	Section 6.1.10
Standard	Waste Management	N	General	<ul style="list-style-type: none"> ▪ Large Scale Solar Guidelines ▪ Waste Classification Guidelines (NSW EPA, 2014). 	Section 6.2.1

APPENDIX B COMMUNITY ENGAGEMENT: FEEDBACK SUMMARY TABLE

The table below summaries feedback received by each stakeholder group and includes a detailed project response.

Table 15 Feedback summary

Stakeholder	Method	Feedback received	Project response
Adjoining landowners	Three one-on-one briefings with adjoining landowners. Briefings were held on 4 July 2024.	Visual impact <ul style="list-style-type: none"> Enquiry about visual impact, specifically from the back / outdoor area of the property (looking towards Coach Roach from the west). Enquiry about visual impact, specifically from an elevated location on neighbouring property. 	<p>A visual impact assessment will be developed as part of the EIS development.</p> <p>Once photomontages are created, Elgin will consult with adjoining landowners to ensure visual impacts are mitigated as much as possible through setbacks and screening options.</p>
		Biodiversity <ul style="list-style-type: none"> Enquiry about biodiversity and the impacts on the land / agricultural land quality as a result of the solar panels. 	<p>Biodiversity is a priority for Elgin. During the development of the EIS, Elgin will be working closely with an ecologist to ensure the following:</p> <p>The solar panels are set back from high-value trees and habitats.</p> <p>As many trees are retained on site as possible (including identifying options for habitat corridors).</p> <p>Possible impacts during construction are carefully managed.</p> <p>Elgin has also undertaken research into any benefits solar farms provide to biodiversity. Findings show that the land/soil is benefiting from the rest in agricultural</p>

Stakeholder	Method	Feedback received	Project response
			<p>activity, and the land quality has been shown to improve as a result.</p> <p>This is an interesting article that summarises some of the research: Farmers who graze sheep under solar panels say it improves productivity. So why don't we do it more? Australia news The Guardian</p>
		<p>Energy distribution</p> <ul style="list-style-type: none"> Question regarding power distribution and what areas will benefit. <p><i>"Is it Victoria or New South Wales?"</i></p>	<p>Energy distribution is based on demand. Once energy is exported into the electrical grid, it will be distributed across NSW and Victoria.</p>
		<p>Bushfire management</p> <ul style="list-style-type: none"> Who is responsible for bushfire management and control? <p><i>"I'm a member of the CFA and we wouldn't be able to manage a fire associated with this type of infrastructure."</i></p>	<p>The solar farm and Battery Energy Storage System (BESS) will be designed to the highest standards for fire safety.</p> <p>Fire and Rescue NSW has strict design guidelines that must be incorporated into the Project design.</p> <p>Some mitigation measures include requiring cleared vegetation zones, fire breaks between panel arrays, strict vegetation management plans and access to water.</p> <p>Like all electrical equipment, solar farms require careful design and management to ensure fire risks are appropriately managed and controlled.</p>
		<p>Consultation</p>	

Stakeholder	Method	Feedback received	Project response
		<ul style="list-style-type: none"> ▪ Enquiry into the process and who has been consulted so far. <p><i>“You mention we’re still early in the process. What conversations have been had so far?”</i></p> <ul style="list-style-type: none"> ▪ Enquiry about how influential community feedback opposing the solar farm will be in the approvals process. <p><i>“Does the community have the ability to stop the solar farm?”</i></p>	<p>The adjoining landowners have been prioritised as part of the community and stakeholder engagement strategies.</p> <p>Consultation undertaken ahead of the near neighbour briefing includes one meeting with the Council officers.</p>
		<p>REZ</p> <ul style="list-style-type: none"> ▪ Enquiry about the lack of consultation regarding the REZ in the area. <p><i>“We weren’t consulted about the REZ and now we have all these solar farms that we don’t want, taking away our productive farming land and ruining our area with millions of panels “</i></p>	
		<p>Decommissioning</p> <ul style="list-style-type: none"> ▪ Enquiry about decommissioning and Project lifespan. <p><i>“How long will the project operation be for and what happens with it once the operation is over?”</i></p>	<p>The solar farm is being designed to operate for up to 50 years.</p> <p>Decommissioning the site will involve removing solar panels and infrastructure and reinstating the land for continued agriculture purposes.</p> <p>The Project is financed to include a decommissioning bond. The bond is set aside at the start of the Project to</p>

Stakeholder	Method	Feedback received	Project response
			<p>ensure decommissioning is adequately undertaken at the end of the Project's lifeline.</p> <p>Once decommissioned, the agricultural land quality will remain untouched and be able to be utilised for farming purposes.</p> <p>A detailed decommissioning plan will inform part of the EIS.</p>
		<p>Site access</p> <ul style="list-style-type: none"> ▪ Enquiry about site access and how construction vehicles will access the site. ▪ This is also an important consideration as the adjoining landowner has cattle crossing Jobsons Road regularly. This cannot be impacted as part of the proposed solar farm. <p><i>"We use Jobsons Road frequently and will need to maintain that level of access."</i></p>	<p>Elgin acknowledges that site access is a priority for the community.</p> <p>Because site access and traffic management were raised as one of the most important considerations from the community's perspective, Elgin will explore options to bring forward this piece of work and appoint traffic engineers earlier than required.</p> <p>Through consultation, Elgin heard how the community use the surrounding road network, which will inform part of the brief to traffic engineers.</p> <p>Elgin is in the process of exploring site access options that pose minimal impact to adjoining landowners and the community that uses the road.</p>
		<p>Planning authority</p> <ul style="list-style-type: none"> ▪ Enquiry about the planning authority and whether the Project will be assessed by the NSW or Victorian Government. 	<p>As this Project is located in NSW, it will go through a SSDA process that is assessed by the NSW Department of Planning, Housing and Infrastructure.</p>

Stakeholder	Method	Feedback received	Project response
		<p>Insurance / public liability</p> <ul style="list-style-type: none"> ▪ Enquiry about insurance and whether there is a risk that public liability will be increased as a result of living next to a solar farm. 	<p>Elgin acknowledges concerns within the community regarding the perceived lack of insurance coverage or higher liability for properties neighbouring a solar farm.</p> <p>To address this, Elgin has consulted with multiple insurance brokers, who have reassured Elgin that there are no instances/examples where properties cannot be insured as a result of living next to a solar farm.</p> <p>If the Project is approved, Elgin will also have a range of insurance policies in place to cover the site in the event of damage or fire.</p> <p>While the base rates for insurance premiums are rising across the board, the advice provided to us indicates that there is no evidence of these premiums being raised for people living near solar farms.</p>
		<p>Tree removal</p> <ul style="list-style-type: none"> ▪ Question about how many trees (specifically high-value trees) will be removed as a result of the solar farm. ▪ A follow-up question was asked about whether dams will be filled in as part of this process. 	<p>Elgin is committed to supporting sustainable practices on the site.</p> <p>When preparing the Project design, Elgin first looks at the environmental values of the site including sensitive waterways, vegetation and habitats. Through careful design, impacts on the environment can be reduced significantly.</p> <p>Every effort is made to design the solar farm in a way that protects high-value trees and waterways. This is also supported by work undertaken by the Project's hydrologist.</p> <p>Any trees removed will also need to be offset at different locations.</p>

Stakeholder	Method	Feedback received	Project response
			Once the Project design footprint is finalised detailed environmental assessments are prepared. These assessments help to identify the potential impacts of the Project and are included in the Project EIS.
		<p>Battery Energy Sub-Station (BESS)</p> <ul style="list-style-type: none"> ▪ Question about where the battery will be located on the site. 	<p>The BESS will be located close to the existing powerline.</p> <p>The location will also be determined to ensure:</p> <p>Easy exportation of power into the grid</p> <p>Minimal impact on neighbours (assessed through a VIA and Acoustic Assessment)</p> <p>Minimal impact on wildlife or vegetation (assessed through the biodiversity and hydrology report).</p>
		<p>Security lighting</p> <ul style="list-style-type: none"> ▪ Enquiry about whether the site will be lit up at night. 	Security lighting will be proposed as part of the SSDA. The lighting will be retained in areas around the BESS for security and safety purposes.
		<p>Future expansion</p> <ul style="list-style-type: none"> ▪ Enquiry regarding Elgin exploring a stage 2or option for expansion in the future. 	The proposed solar farm will maximise the existing grid capacity. At this time, Elgin is not exploring future expansion as there is no capacity remaining on the grid in this area.
		<p>Glint and glare</p> <ul style="list-style-type: none"> ▪ Enquiry about glint and glare and whether neighbours and people driving past the solar 	Solar panels are designed to absorb sunlight, rather than reflect it.

Stakeholder	Method	Feedback received	Project response
		<p>farm on Coach Road and Jobsons Road will be impacted.</p>	<p>They are carefully designed and installed to minimise light reflection. They are also coated with a specific glaze to mitigate glare.</p> <p>This process involves:</p> <p>Angling the solar panels to reduce reflection (this results in negligible glare, reflecting as little as 2% of the sunlight received).</p> <p>Ensuring the panel coating is dark, and non-reflective to help minimise visual contrast with the surrounding landscape.</p> <p>A detailed glint and glare report is also being prepared as part of the EIS. The glint and glare report will determine the sunlight's reflection from the solar panels and assess the visual impact of the facility's appearance in the area.</p>
		<p>Site office</p> <ul style="list-style-type: none"> ▪ Enquiry about construction and whether there will be an office located on-site. 	<p>During construction, there will be a 'laydown' area where the construction material will be located.</p> <p>During this time, there is a possibility that there will be a temporary site office for staff to use. This will be determined during the preparation of the EIS.</p>
<p>Broader community Gerogery Morven Culcairn</p>	<p>A community information session was held on 4 July (from 4.30 – 6.30pm). The session was attended by over 35</p>	<p>Traffic considerations</p> <ul style="list-style-type: none"> ▪ Jobsons Road is used frequently for cattle driving – heavy traffic may cause danger to these animals. ▪ Coach Road is subject to heavy traffic and non-local traffic. 	<p>Elgin acknowledges that site access is a priority for the community.</p> <p>Because site access and traffic management were raised, Elgin will explore options to bring forward this piece of work and appoint traffic engineers earlier than required.</p>

Stakeholder	Method	Feedback received	Project response
Mountain Creek Walla Walla	members of the community.		<p>Through consultation, Elgin heard how the community use the surrounding road network, which will inform part of the brief to traffic engineers.</p> <p>Elgin is in the process of exploring site access options that pose minimal impact to adjoining landowners and the community that uses the road.</p>
		<p>Site legacy</p> <ul style="list-style-type: none"> Some community members showed concern about the site’s farming legacy and how this change of use could be impactful. 	<p>Elgin acknowledges the site’s long farming history and seeks to honour this history through the continuation of sheep grazing.</p>
		<p>Rainfall</p> <ul style="list-style-type: none"> Feedback about this area being known for high rainfall, which could impact the productivity of solar generation. 	<p>As part of the SSDA, the engineers will complete computer modelling of electricity generation from the solar farm using historical weather data and recognised industry standards. On other Projects that are located in locations that experience very similar weather patterns, the results show that this area is highly productive for solar electricity generation. Solar farms can still produce electricity in low-light conditions and overcast weather.</p>
		<p>Biodiversity</p> <ul style="list-style-type: none"> Questions around potential impacts on biodiversity. 	<p>Elgin appreciates suggestions and insights about biodiversity.</p> <p>Biodiversity is an important consideration, and Elgin will share all information received with the Project team for consideration during the preparation of the EIS.</p> <p>Once the SEARs is realised, Elgin will appoint an Ecologist who will undertake further assessments.</p>

Stakeholder	Method	Feedback received	Project response
			<p>On other projects, Elgin has been very proactive in identifying risks to biodiversity and responding through significant design changes.</p> <p>For example, in Victoria, Elgin identified an endangered Black Falcon nest on another project site. In response, they significantly revised their proposal, removing approximately 11 ha of solar panels. This allowed for the retention of 18 trees, including 4 small trees and 14 large mature trees. The preservation of these trees also established a habitat corridor, enhancing connectivity to a nearby creek and the surrounding areas.</p> <p>The neighbour that brought the Black Falcon nest to the attention of Elgin commented in a media that ‘Elgin responded tremendously. It’s really good that they’re willing to alter their plans for a threatened species that they didn’t know was there at the time, that they didn’t know was breeding and was using the site quite frequently.’</p> <p>Elgin has also been doing a lot of its own research about solar having a positive impact on biodiversity. This includes exploring the benefits of farmers grazing sheep under solar panels, which can improve the land’s productivity.</p> <p>This is an interesting article that summarises some of the research: Farmers who graze sheep under solar panels say it improves productivity. So why don’t we do it more? Australia news The Guardian</p>

Stakeholder	Method	Feedback received	Project response
		<p>Environmental considerations</p> <ul style="list-style-type: none"> Concern was raised about the potential removal of several trees. It was reported by those consulted that this may be attributed to more heat in the region. 	<p>Elgin is committed to supporting sustainable practices on the site.</p> <p>When preparing the Project design, Elgin first looks at the environmental values of the site including sensitive waterways, vegetation and habitats. Through careful design, impacts on the environment can be reduced significantly.</p> <p>Every effort is made to design the solar farm in a way that protects high-value trees and waterways. This is also supported by work undertaken by the Project's hydrologist.</p> <p>Any trees removed will also need to be offset at different locations.</p> <p>Once the Project design footprint is finalised detailed environmental assessments are prepared. These assessments help to identify the potential impacts of the Project and are included in the Project EIS.</p>
		<p>Agricultural land use</p> <ul style="list-style-type: none"> Concern about good farmland going to waste. This notion was raised by multiple community members. 	<p>A detailed Agricultural Land Use assessment will be prepared to understand the context of the site and form part of the EIS submission.</p> <p>The Project team is committed to continuing sheep grazing activities on the site to maximise productive use of the land. Grazing also helps to keep growth low and reduces the need for other forms of weed and grass management.</p> <p>Allowing sheep grazing on the farm has proven to be beneficial for the farmer too, as livestock can enjoy</p>

Stakeholder	Method	Feedback received	Project response
			shady patches on hot days and overall water use for livestock can be reduced.
		<p>Recycling panels</p> <ul style="list-style-type: none"> Question about how panels will be recycled and whether there is a plan for decommissioning the project. <p><i>“Can you advise the lifespan of a solar panel and what options are available for recycling?”</i></p>	<p>Elgin is at a very early stage in the process, and once these plans are developed, Elgin will share this information with the community.</p> <p>The proposed solar farm is expected to have a lifespan of 50 years. Solar panels typically last between 30 and 50 years, and regular maintenance will be crucial for its operation.</p> <p>As part of the planning application, Elgin will provide a detailed decommissioning plan outlining the process for recycling the panels.</p>
		<p>Manufacturing</p> <ul style="list-style-type: none"> Question about the supply chain of solar panels, noting that shipping Australian resources overseas for processing. 	<p>Australia does not currently have the resources to manufacture solar panels for utility-scale solar farms.</p> <p>However, the federal government has just announced funding of \$1 billion to kick-start solar manufacturing – so this may be an option for Morven Solar Farm in the future. This will be determined after planning approval has been received.</p>
		<p>Soil erosion</p> <ul style="list-style-type: none"> Questions regarding the potential for soil erosion as a result of the proposed solar farm. This is specifically in relation to rainwater running off the panels and pooling. 	<p>As part of the EIS process, we will prepare a soil assessment report and a hydrology report. These reports will address water and sediment management measures for the proposed project.</p>
		<p>Fire risk</p>	<p>Through the EIS process, Elgin will assess the fire risk as a result of the proposed solar farm. This will include</p>

Stakeholder	Method	Feedback received	Project response
		<ul style="list-style-type: none"> ▪ Questions about fire risk and management. Through consultation, we heard this area is prone to lightning and there is a lack of fire trails being maintained within the Hills / National Park. 	<p>assessing the risk of lightning and its close proximity to the national park.</p> <p>In addition to this, the solar farm and Battery Energy Storage System (BESS) will be designed to the highest standards for fire safety.</p> <p>Fire and Rescue NSW has strict design guidelines that must be incorporated into the project design.</p> <p>Some mitigation measures include requiring cleared vegetation zones, fire breaks between panel arrays, strict vegetation management plans and access to water.</p> <p>Like all electrical equipment, solar farms require careful design and management to ensure fire risks are appropriately managed and controlled.</p>
		<p>Waste and toxic runoff</p> <ul style="list-style-type: none"> ▪ Those consulted mentioned concerns about waste and toxic runoff from the solar panels. The concern was that this would have an impact on the land and soil quality. 	<p>Solar panels and infrastructure technology have improved significantly, and they are not made with any toxic materials. They are also made with a glass casing and as a result, there is no risk of toxic sediment impacting the environment.</p>
		<p>Community benefit sharing</p> <ul style="list-style-type: none"> ▪ Questions about community benefit sharing and how this fund is allocated. Through consultation, we heard the community has not seen any of the funds promised on other projects and wants to know what Elgin’s plan is for this proposal. 	<p>In consultation with the community and Council, Elgin is looking at opportunities to share the benefits of the project through a community benefit fund. Benefit sharing is best practice for renewable energy projects in NSW and around Australia.</p> <p>The fund would come into effect when the project is operational and could be distributed to the local</p>

Stakeholder	Method	Feedback received	Project response
		<p data-bbox="757 331 1227 360">Learning from other projects in the area</p> <ul data-bbox="757 392 1370 608" style="list-style-type: none"> <li data-bbox="757 392 1370 608">▪ This community has a strong understanding of what's included as part of a solar farm proposal. They have experienced impacts from other proposals in the area, which Elgin has acknowledged and will respond to through the EIS process. <p data-bbox="757 639 927 668">This includes:</p> <ul data-bbox="757 700 1348 956" style="list-style-type: none"> <li data-bbox="757 700 1301 729">▪ Ensuring adequate screening/landscaping <li data-bbox="757 761 1348 853">▪ Maintaining the quality of the public roads and ensuring no damage is caused during construction <li data-bbox="757 885 1339 956">▪ Involve the community in the allocation of the community benefit fund. 	<p data-bbox="1411 233 1951 295">community through grants, sponsorships and partnership programs.</p> <p data-bbox="1411 331 2074 474">Elgin will review the past objections received from other solar farm projects to ensure it considers the existing sentiment and views of the community through the development of its EIS.</p>

APPENDIX C SOCIAL IMPACT SCOPING WORKSHEET

APPENDIX D PRELIMINARY LVIA

APPENDIX E PRELIMINARY BIODIVERSITY CONSTRAINTS

APPENDIX F INDICATIVE SITE LAYOUT