

5 July 2022

NSW Department of Planning and Environment
Attn: Mr Wayne Jones
4 Parramatta Square
12 Darcy Street Parramatta NSW 2150

Dear Mr Jones,

West Wyalong Solar Farm (SSD 9504) Development Consent Condition 8(a), Schedule 3 – Vegetation Buffer

I refer to your Request for Information (RFI) dated 24th June 2022 concerning the above following Lightsource bp's letter and supporting evidence by Lightsource's landscaping contractor (Hunter Land Management Pty Ltd - HLM) dated 27th May 2022 to the Department. Lightsource has requested the Secretary's agreement to vary Condition 8(a) of the Development Consent to allow the planting works for the vegetation buffer be delayed beyond the commencement of operations from November 2022 to April/May 2023 (Autumn).

Your RFI states the following:

Please provide evidence that the delay in planting the vegetation buffer will not impact the establishment of the vegetation buffer within 3 years of the commencement of operation.

Lightsource bp has engaged pitt&sherry to advise and assist on this matter.

Condition 8 is as follows:

"8. The Applicant must establish and maintain a mature vegetation buffer and infill planting (landscape screening) at the locations outlined in the figure in Appendix 1 to the satisfaction of the Secretary. This vegetation buffer must:

- (a) be planted prior to commencing operations;*
- (b) be comprised of species that are endemic to the area;*
- (c) be established within 3 years of commencing operations; and*
- (d) be properly maintained with appropriate weed management,*

unless the Secretary agrees otherwise."

Criteria 'a' to 'd' of the condition are requirements that must be satisfied unless the Secretary agrees otherwise. From the RFI we understand the Secretary would be satisfied the vegetation buffer can be planted after the commencement of operations in November 2022 if this response to the RFI is agreeable to the Secretary.

Further to HLM's advice to Lightsource's initial request, pitt&sherry consulted HLM to obtain further evidence that the delay in planting would still be established within 3 years of commencing operations. Mr. Christian Thomsen of pitt&sherry also contacted Mr. Kurtis Wathen of the Department to discuss the RFI.

HLM advise the reason for the proposed delay in planting is based on the limited availability at local nurseries of the required amount of tube stock of the specific species for planting the vegetation buffer. Tubestock are typically grown in 40mm tubes and typically achieve a height up to 500mm before planting. HLM are instead proposing an "advanced tree planting" approach that will allow the tube stock to be grown in a controlled environment (frequent

watering and reduced exposure to heat and cold extremes) for a longer period off site. The resultant maturity of the tube stock in 150mm pots would be 20mm Diameter at Breast Height (DBH) and 1 – 1.5 metres in height. The delay in planting this tubestock after the November 2022 commencement of operations not only allows for larger tube stock size and a better landscape screening but also avoids the peak summer heat and before the winter frosts where risk of mortality is highest upon replanted tubestock.

HLM estimate that vegetation planted in Autumn 2023 (April/May) will be 3 metres in height with a DBH of 100mm in November 2025 (3 years from commencement of operations in November 2022).

Based upon the advantages of the advanced tree planting approach described above, the Secretary can be satisfied that Lightsource's request to delay planting of vegetation after development commencement will not impact the establishment of the vegetation buffer within 3 years of the commencement of operations.

If you wish to discuss this matter further please don't hesitate to contact Mr Christian Thomsen at pitt&sherry 9468 9335.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Trevor Allen', with a long horizontal flourish extending to the right.

Trevor Allen

Associate Senior Environmental Planner