



Submissions Report

PARKES SOLAR FARM

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1 INTRODUCTION

1.1 BACKGROUND

The Parkes Solar Farm proposal (the 'proposal') would produce up to 57 megavolt-ampere (MVA) or 65 Megawatts (MW) of electricity. The proposal encompasses the construction and operation of a solar photovoltaic array over an area up to 240 hectares, with associated infrastructure, maintenance facilities, access tracks, overhead or underground powerline to connect to the nearby substation and upgrades to adjacent roads.

The proposal is classified as State Significant Development under the NSW *Environmental Planning and Assessment Act 1979* and requires consent from the Minister for Planning.

The proponent for the proposal is Neoen Australia (Neoen), an Independent Power Producer specialised in renewable energy projects. The company is headquartered in Paris (France) and operates across renewable energy technologies, including solar, wind, and biomass, with an experienced workforce of around 100 employees. Neoen develops, finances, constructs, operates and maintains its projects as a fully integrated renewable energy player, with a genuine long-term approach.

An Environmental Impact Statement (EIS), describing the proposal and assessing its potential environmental impacts, was prepared by NGH Environmental and submitted to the NSW Department of Planning and Environment on 17 March 2016. The Secretary's Environmental Assessment Requirements (SEARs) for the preparation of the EIS included investigation of key environmental issues including:

- Aboriginal cultural heritage.
- Visual amenity.
- Biodiversity.
- Noise.

These issues were investigated via specialist assessments. Lower risk issues were investigated primarily by desktop assessment.

1.2 PURPOSE OF THIS REPORT

This Submission Report identifies and addresses submissions made in regards to the Parkes Solar Farm EIS, submitted to the NSW Department of Planning and Environment on 17 March 2016.

NGH Environmental has prepared this Submissions Report on behalf of Neoen to fulfill the requirements of Section 75H of the *Environmental Planning and Assessment Act 1979*. The purpose of the Submissions Report is to:

- Consider and respond to the issues raised in the public and agency submissions for the Parkes Solar Farm.
- Describe any changes to the proposal, including a revised set of proposed mitigation measures.

1.3 PROJECT SUMMARY

No substantive changes are proposed to the publically exhibited Parke Solar Farm project description. This section summarises the key aspects of the proposal. The full description is provided in Section 3 of the EIS. It is noted that the description allows for capacity 'up to 65 MW' and development of 'up to 240 hectares' and that a lesser capacity and area may be determined in the final design stage. In all cases, the development would have a capital investment value exceeding \$30 million and would therefore still constitute State Significant Development.

This section summarises the key aspects of the proposal.

1.3.1 Site location

The proposal site is located approximately 10 kilometres (km) West of Parkes (refer Figure 1), within the Parkes Local Government Area (LGA). The site is accessed via Henry Parkes Way (locally known as Condobolin Road) and Pat Meredith Drive to the west. The solar farm proposal would connect to the existing 132/66 kilovolt (kV) Transgrid substation located on Pat Meredith Drive, to the north of the site.

1.3.2 Key components of the proposal

The Parkes Solar Farm proposal site covers approximately 240 hectares (ha) of land. Key infrastructure components are illustrated in Figure 2 and would include:

- Solar arrays: approximately 215,000 solar panels supported by approximately 27,000 piles, driven or screwed into the ground in order to support the solar array's mounting system.
The panels to be installed would be either:
 - single-axis tracking panels (which would have approximately 2,850 tracker units)
 - north-oriented fixed-tilt panels
 - east-west facing fixed-tilt panels
 - or a combination of these alternatives.
- Approximately 28 PV boxes or PV skids (either containerised or installed on a 'skid' platform), each of them containing an inverter and an 11 kV, 22 kV or 33 kV transformer.
- Onsite cabling and electrical connections between solar arrays and panel inverters.
- One delivery station in a container or on a skid platform.
- Cables and trenches.
- Internal access tracks to allow for site maintenance vehicles, and gravel access road and parking for staff and visitors.
- Staff amenities and offices.
- Perimeter security fencing, approximately 2.3 metres (m) high.
- A vegetation buffer.
- A 66kV overhead or underground power line to connect into the existing Parkes Transgrid substation, approximately 600 m north of the site.

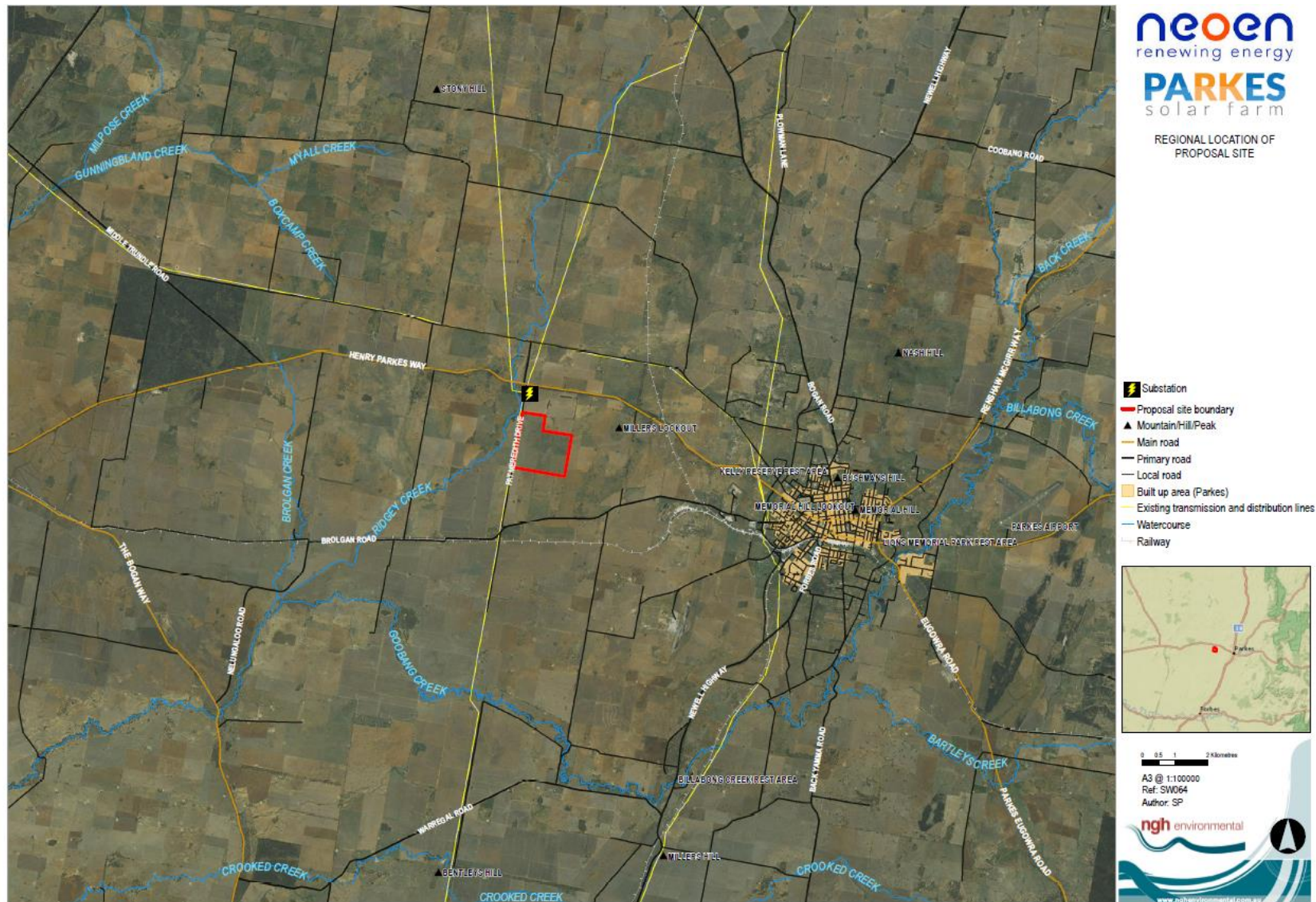


Figure 1 Regional location of the proposal

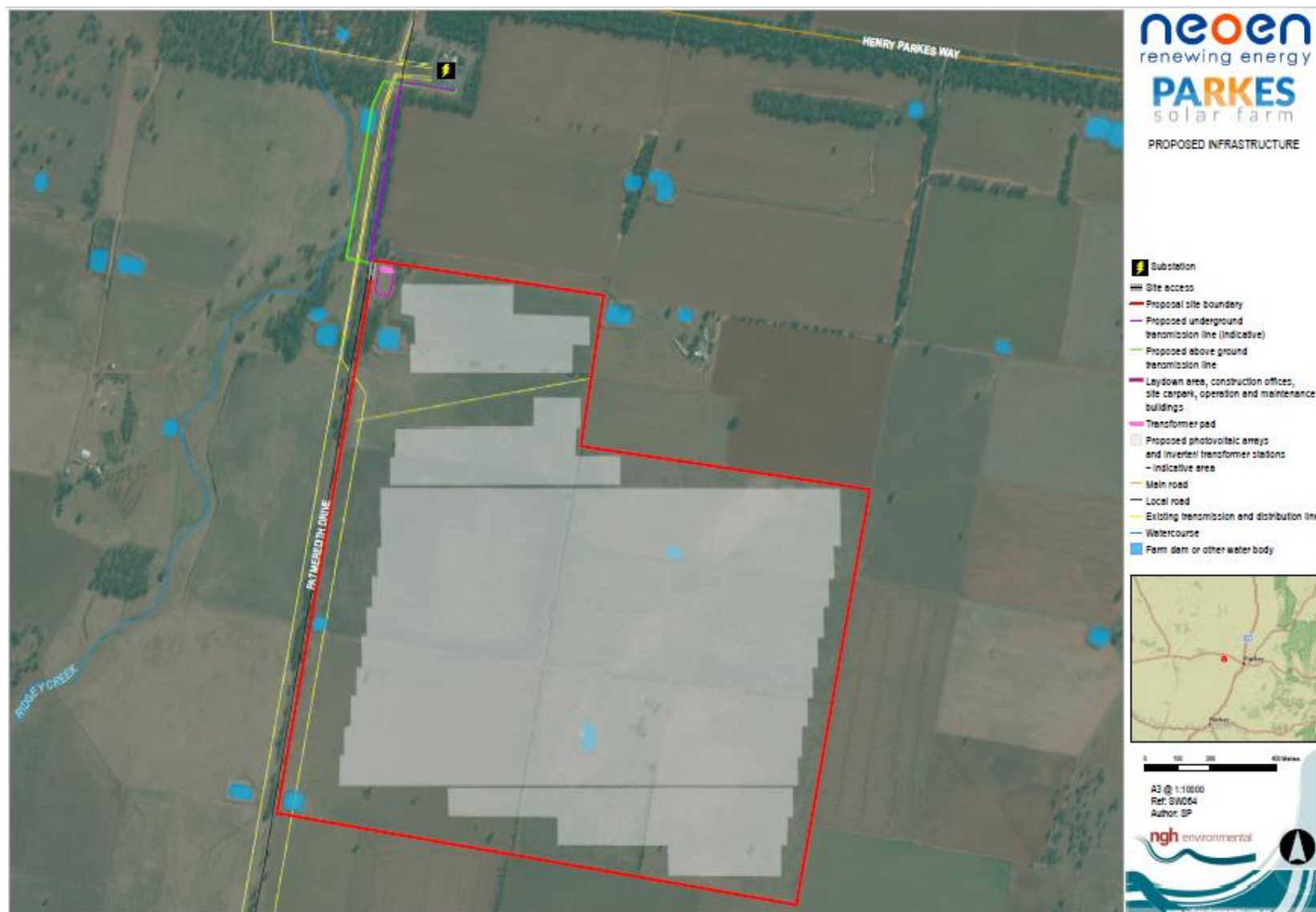


Figure 2 Proposed infrastructure

Detailed design will minimise impacts on sensitive features that occur on the site (including a planted row of trees which run north-south through the site and groups of trees in south eastern portion of the site which would be retained). The vegetation buffer would be established post-construction, to minimise visual impacts in specific locations.

Within the 240 ha proposal site, ground disturbance would be limited to:

- The installation of the piles supporting the solar panels, which would be driven or screwed into the ground.
- Construction of internal access tracks.
- Establishment of PV boxes and delivery station.
- Trenches for the installation of cables.
- Establishment of staff amenities and offices.
- Construction of perimeter security fencing.

The indicative solar array area covers the majority of the site, however the ground disturbance from pile installation would be disturb only about 0.2% of the total site area. Panels within the solar array area would sit above the ground and ground cover would be maintained under the panels. The area of the site which would be affected by shading from the solar panels would be approximately 70% of the total site area. Additional ground disturbance outside the solar arrays would result from construction of the internal access tracks, trenches for cabling and footings for other equipment.

Ancillary facilities would be located within the site boundary and would include:

- Material laydown areas.
- Temporary construction site offices.
- Temporary car and bus parking areas for construction workers transportation. Once the plant has been commissioned a small car park would remain for the minimal staff required and occasional visitors.
- Staff amenities. Once constructed, the solar farm would be monitored and operated remotely and would therefore require a minimum number of maintenance personnel (0.5 full time equivalent staff) to be onsite.

The annual output of the proposal would be up to 125 Gigawatt hours (GWh), with a capacity factor of approximately 17 to 23 per cent depending on the technology. The construction phase of the project would be approximately 9 months with a capital cost of approximately \$98 million. The proposal is expected to have a 25 to 30 year operating life at which point, all above ground infrastructure would be removed from the site.

1.3.3 Capital investment

The proposed Parkes Solar Farm would have a capital investment of approximately \$98 million.

1.3.4 Indicative timeline

An indicative timeline for the proposal is outlined in Table 3-1.

Table 1-1 Indicative timeline.

Phase	Approximate commencement	Approximate duration
Construction	January 2017	9 months
Commissioning	September 2017	1 month
Operation	October 2017	25 years
Decommissioning	2042	2 months

For more detailed information of the components and ancillary facilities of the solar farm refer to the Parkes Solar Farm EIS, Section 3.

1.4 PROJECT MODIFICATIONS

Changes to the proposal are minor and are related to revisions to the proposal's mitigation measures. These are detailed in Section 3 and provided in full, Appendix A.

1.5 PROJECT BENEFITS

The Parkes Solar Farm would generate renewable energy and would displace approximately 110,000 tonnes of carbon dioxide (CO₂) or greenhouse gas emissions per year during operation. Based on a proposed operating capacity of 125,000 megawatt hours (MWh) of electricity per year, the proposal would generate enough renewable energy to service over 19,000 average NSW households and would be the equivalent of removing approximately 32,500 cars off the roads each year.

The solar farm would contribute to Australia's Large-scale Renewable Energy Target (LRET) of generating 33,000 Gigawatt hours of renewable electricity annually by 2020.

1.6 PROJECT JUSTIFICATION

The Parkes Solar Farm would meet the proposal objectives, principally the development of a commercial scale solar electricity power station and is justified in terms of reducing Australia's GHG emissions, meeting future energy demands, contributing to Australia's renewable energy targets, supporting a global reduction in GHG emissions, being consistent with the REAP and contributing to economic development in the Parkes region.

The proposal has been developed to make use of existing grid connections, on a previously cleared agricultural site that has generally low environmental values.

2 CONSIDERATION OF SUBMISSIONS

2.1 EXHIBITION PERIOD AND LOCATION

The Parkes Solar Farm EIS was on public exhibition from 25 March to 28 April 2016 at:

- Department of Planning Information Centre, 23 -33 Bridge Street, Sydney.
- Parkes Shire Council, 2 Cecile Street Street, Parkes.
- Nature Conservation Council, Level 2, 5 Wilson Street, Newtown.
- Office of Environment and Heritage, Level 1, 48-52 Wingewerra Street, Dubbo NSW 2830.
- Roads and Maritime Services (RMS), 51-55 Currajong Street, Parkes NSW 2870.

Local residents were notified of the exhibition period through newspaper advertisements placed in the local papers by the Department of Planning and Environment.

2.2 RESPONSES RECEIVED

The Department of Planning and Environment received a total of eight submissions for the proposal during the public exhibition period, as detailed in Table 2-1.

Table 2-1 Responses received

Category	Number of submissions
Individual members of the public	1
Government agency submissions	7
Total	8

Central West Local Land Services was consulted regarding the environmental impact assessment for the proposal. As discussed in Section 4.2 of the EIS, Central West Local Land Services had not responded by the time the EIS was submitted. Central West Local Land Services subsequently provided feedback via email dated 4 April 2016 raising a number of issues which are addressed in this report.

The submissions are provided in full, Appendix B.

2.3 PROPONENT'S RESPONSE TO COMMUNITY SUBMISSIONS (1)

One community submission was received from an adjoining neighbor who is also the Mayor of Parkes Shire Council. Additions / revisions to the proposal's mitigation measures are shown in ***bold italics*** and provided in full, Appendix A.

Issue raised	Proponent's response
Visual impact on farms to the south and east of the proposal	The mitigation strategy of visual impacts centered on five residences that were identified as having potentially high to medium level visual impacts are considered in the VIA (Appendix E of the EIS). Screening on the perimeter of the site was recommended to address views from residences as this was considered a much higher impact than views from working farms. An indicative vegetation buffer on sections of the site perimeter is proposed in consultation with affected landowners, based on the actual visual impacts of the constructed wind farm. The infrastructure is low level and existing vegetation may adequately break up views from many areas. The current vegetation type of the land and scenic value were considered in the proposed planting. Additional screening to break up views from all areas of surrounding properties is not proposed however, Neoen would commit to: <i>Additional screening in consultation with affected landholders for all dwellings within 2 km, to address views from dwellings or house yards.</i>
Water run-off into dams, flowing in a Southerly direction, being obstructed	Section 7.2 Water use and water quality (surface and groundwater) and hydrology in the EIS address site drainage. This includes identifying the location of dams in the nearby vicinity of the project. The solar farm would be designed so that there is minimal change to the natural water flow on the site. During construction, dirty water would be collected and treated before water leaving the site or entering waterways. Construction impacts would be managed in accordance with the Managing Urban Storm water: soils and construction series. A soil and water management Plan will also be implemented to ensure all care is taken. During operation, no water diversion or alteration to existing run off is proposed. Rain water landing on panels would disperse in front of the panels and is expected to have a minor impact on local drainage and dam levels. Ground cover management is key to ensuring the areas beneath the panels do not become bare and develop erosion changes that may alter run off patterns.
Fire precautions: mowing or grazing as fire reduction methods, use of highly productive agricultural land	A Bush Fire Management plan is to be developed with the aid of the RFS as outlined in section 7.9.3 of the EIS. This includes the management of fuel loads onsite. Maintaining low fuel levels beneath panels is required not only for bush fire prevention but to ensure no growth between or over

	panels that may affect the solar access / yield of the panels. Grazing may be considered for fuel management. While it is acknowledged that the site has high agricultural values that could not be utilized for the operational life of the solar farm, it is noted that the proposal is highly reversible and that no long term impact on the capability of the land is expected, post decommissioning. Additionally, the proponent now commits to: • <i>The Decommissioning Environmental Management Plan will outline rehabilitation objectives and strategies for returning the land to agricultural production (or alternate use) prior to project implementation.</i>
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2.4 PROPONENT'S RESPONSE TO GOVERNMENT AGENCY SUBMISSIONS (7)

Agency submissions are paraphrased below and addressed by the proponent in the right hand column. Revisions to the proposal's mitigation measures are shown in ***bold italics*** and provided in full, Appendix A.

2.4.1 NSW Planning and Environment

Issue	Response
1 Road upgrades	Road upgrades to accommodate heavy vehicle movements during construction would be undertaken in consultation with both Parkes Shire Council and RMS. Neoen has initiated discussions with Parkes Council and Road and Maritime Services (RMS) with regard to road upgrade requirements for the Pat Meredith Drive / Henry Parkes Way intersection and has provided a draft TMP to RMS. The proponent commits to funding the proposed road upgrades, in consultation with Parkes Shire Council and RMS pending the final submission by the applicant of the Traffic Management Plan (TMP) before construction commences.
2 Biodiversity	a) Inland Grey Box Endangered Ecological Community (EEC) The proposal site has been chosen to avoid or minimise impacts to biodiversity where possible. The majority of the areas of the EEC have been avoided through the design process. These areas include the patches of Inland Grey Box Woodland (EEC-TSC Act) and Grey Box grassy woodland (EEC-EPBC Act) within the proposed site boundary, as well as planted rows of trees which constitute the same EECs, which will be retained on-site. The EIS includes the comments from the OEH visit in Section 4.1. and the proponent investigated: ○ <i>Whether the site car park and office could be located elsewhere on the site to improve road safety and potentially reduce the need for tree lopping / clearing.</i> ○ <i>Whether the transmission line can be put underground along the centre of Pat Meredith Drive, reducing the need to clear for an overhead powerline</i> The proposed above ground power line has been designed so that it would only require the minimal amount of clearing or pruning of the EECs for construction and operation. This will be offset in accordance with the NSW Biobanking and Offsets Scheme. There is an option to offset impacts to the Box Gum woodland EEC by retaining the Grey Box woodland EEC located within the central part of the site of the solar array, and further enhancing this community by planting smaller trees (such as Kurrajongs) within and adjacent to this remnant vegetation. This would be subject to a Biodiversity Offset Strategy (BOS) if required (BAR Section 5.1). Neoen is giving consideration an underground powerline option, to avoid EEC impacts. In the case that the powerline is above ground, the proponent has committed to an additional mitigation measure as follows: • <i>Minimise EEC impacts via detailed design including relocation of the car park and site office and enhancement of the Grey Box community in this part of the site.</i>

b) Paddock trees	Mitigation measures to minimise biodiversity impacts are outlined in Section 6.2.5 of the EIS. The proponent also commits to: • <i>Using the BioBanking Paddock Tree Calculator to quantify the impact on paddock trees and inform offset requirements.</i> • <i>Retained areas of planted native vegetation are expanded accordingly.</i> In consultation with OEH.
c) Pine Donkey Orchid	The proponent now commits to: • <i>Targeted surveys in August - September 2016 for the Pine Donkey orchid. If detected and this species cannot be avoided, it would be offset in accordance with the BCC.</i>
3 Water use – availability of water to support the project	The proponent has consulted with the Local Water Utility (Parkes Shire Council) regarding water availability. Geoff Porter (Parkes Shire Council Engineering Services) advised verbally on 19 May 2016, that there will be sufficient water capacity to support construction of the project (108,750 kL of non-potable water). To provide certainty, the proponent has committed to additional mitigation measures as follows: • <i>The quantities and sources of construction water would be fully detailed within the construction environmental management plan to be developed prior to impacts. The plan would be developed with input from DPI Water.</i> • <i>The quantities and sources of water required during operation would be fully detailed within the operation environmental management plan to be developed prior to impacts. The plan would be developed with input from DPI Water.</i>
4 Landowners consent required	Land Owner consent (Lot35/DP1103229 & Lot792/SP750152): On 18-May-2016 Mr John Smeaton advised verbally that consent will be granted for a new easement. A deed of option is currently being drafted for both parties to enter into. Neoen has submitted a formal request to Crown Land for a new easement to install the underground high voltage cables through Lot7002/DP94814. Crown Land has responded that this lot is managed by Local Land Services (LLS). Deborah Bate from LLS has verbally confirmed that LLS would have no objection in principle for an easement going through this lot. However, more formal easement agreement process will be followed between Neoen and LLS in the weeks to come. Joel Cowling (Program Engineer, Parkes Shire Council) advised verbally on 18 May 2016 that the installation of underground high voltage cables across Pat Meredith Drive should be permissible. Neoen has begun the application process for this. Milos Popadic from Transgrid has indicated that Transgrid would allow a new Neoen easement entering into the Transgrid substation lot (lot 1 in DP 71829). Milos also indicated that Transgrid would not object to allowing Neoen to encroach into their existing overhead powerline easements if necessary. Transgrid is currently preparing a letter to confirm their consent in writing.
5 Other matters	Additional matters raised by the Department are addressed in the agency responses below.

2.4.2 Office of Environmental and Heritage

Issue	Response
Aboriginal heritage	
Recommendations of the Aboriginal Cultural Heritage Assessment report be implemented	The OEH supports the recommendations made by the Aboriginal Cultural Heritage Assessment (Appendix G of the EIS). Submission from the Binjang Wellington Wiradjuri Heritage Surveys raised no concerns. Submission from the Wiradjuri Council of Elders included the following: <i>The local Wiradjuri community would like to know if there are any materials beneath the surface of this area (approximately 100 or 200 cm deep). To formalise and finalise the clearances required before any work starts on this site, a meeting with the Aboriginal representatives that were on site needs to take place to discuss monitoring for cultural sites when the area is graded. The size and distance of the grading will need to be discussed as well as timing to suit the Neoen Australia Pty Ltd company plans and agenda.</i> As per Section 6.3.5 of the EIS a Cultural Heritage Management Plan would be prepared in consultation with the registered Aboriginal parties that incorporates the following measures: - Where avoidance of the recorded artefacts within the proposal area is not possible, the artefacts would be collected and moved to a safe area within the property, as close as possible to their original location, but which will not be subject to ground disturbance. The collection and relocation should be undertaken by representatives of the registered Aboriginal parties. A new AHIMS site card will need to be completed identifying the new location of the moved artefacts. - Incorporates an unexpected finds protocol to allow for management of finding additional Aboriginal artefacts during the construction of the solar farm. - Includes a protocol where, in the unlikely event that human remains are discovered during the construction, all work must cease. OEH, the local police and Peak Hill LALC should be notified. Further assessment would be undertaken to determine if the remains were Aboriginal or non-Aboriginal. The proponent has committed to the additional mitigation measures as part of the Cultural Heritage Management Plan: <i>The Cultural Heritage Management Plan will be prepared with input from the Wiradjuri Council of Elders.</i>
Biodiversity	
Inland Grey Box Endangered Ecological Community (EEC)	The proposal site has been chosen to avoid or minimise impacts to biodiversity where possible. The majority of the areas of the EEC have been avoided through the design process. These areas include the patches of Inland Grey Box Woodland (EEC-TSC Act) and Grey Box grassy woodland (EEC-EPBC Act) within the proposed site boundary, as well as planted rows of trees which constitute the same EECs, which will be retained on-site. The EIS includes the comments from the OEH visit in Section 4.1. and the proponent investigated: <i>Whether the site car park and office could be located elsewhere on the site to improve road safety and potentially reduce the need for tree lopping / clearing.</i>

	○ <i>Whether the transmission line can be put underground along the centre of Pat Meredith Drive, reducing the need to clear for an overhead powerline</i> The proposed above ground power line has been designed so that it would only require the minimal amount of clearing or pruning of the EECs for construction and operation. This will be offset in accordance with the NSW Biobanking and Offsets Scheme. There is an option to offset impacts to the Box Gum woodland EEC by retaining the Grey Box woodland EEC located within the central part of the site of the solar array, and further enhancing this community by planting smaller trees (such as Kurrajongs) within and adjacent to this remnant vegetation. This would be subject to a Biodiversity Offset Strategy (BOS) if required (BAR Section 5.1). Neoen is giving consideration an underground powerline option, to avoid EEC impacts. In the case that the powerline is above ground, the proponent has committed to an additional mitigation measure as follows: • <i>Minimise EEC impacts via detailed design including relocation of the car park and site office and enhancement of the Grey Box community in this part of the site.</i>
Paddock trees	Mitigation measures to minimise biodiversity impacts are outlined in Section 6.2.5 of the EIS. The proponent also commits to: • <i>Using the BioBanking Paddock Tree Calculator to quantify the impact on paddock trees and inform offset requirements.</i> • <i>Retained areas of planted native vegetation are expanded accordingly.</i> In consultation with OEH.
Expansion of native vegetation	Table 5-2 of the BAR provides detail of measures proposed to avoid and minimise direct impacts of the project during operational phase including: • Increase/improve native species diversity and connectivity Section 5 of the EIS states that the community of Box Gum woodland EEC in the central part of the solar array has the potential to further enhance the community by planting smaller trees within and adjacent to remnant vegetation. The proponent also commits to: • <i>Offsetting the loss of paddock trees through expansion of the north-south running line of planted vegetation, with the minimum quantity of trees to be added to this area determined by the Paddock Tree Calculator.</i>
Pine Donkey Orchid	The proponent now commits to: • <i>Targeted surveys in August - September 2016 for the Pine Donkey orchid. If detected and this species cannot be avoided, it would be offset in accordance with the BCC.</i>

2.4.3 DPI Water

Issue	Response												
Soil and Water Management Plan	A soil and water management plan form part of the proposal as outlined in Section 7.1.3 of the EIS. Additional wording has been added as follows (in bold): <i>A soil and water management plan, and erosion and sediment control plans, would be prepared with input from DPI, implemented and monitored during the project, in accordance with Landcom (2004), to minimise soil (and water) impacts. These plans would include provisions to:</i>												
Rehabilitation objectives and strategies to return land to agricultural production be defined prior to project implementation	Ground disturbance to the site would be minimal as the mounting system is driven or screwed into the ground. The EIS in Section 7.6.3 states that the proponent commits to ‘rehabilitation of areas disturbed during the operation of the solar farm, to allow a return to agricultural or alternate use.’ It is noted that there are risks in developing an overly prescriptive rehabilitation plan for actions to be undertaken in 25-30 years at the end of the project’s life. However, to provide certainty regarding the objectives of the plan the proponent now commits to: <i>The Decommissioning Environmental Management Plan will outline rehabilitation objectives and strategies for returning the land to agricultural production (or alternate use) prior to project implementation.</i>												
Source and security of water supply - construction	The department requires that water sources for construction to be confirmed before approval is granted. Table 7-3 of the EIS quantifies construction water requirements and availability: <table><tr><th>Water quality</th><th>Annual construction water requirement (kL)</th><th>Potential sources</th><th>Availability</th></tr><tr><td>Potable (drinking)</td><td>30 (for 9 months)</td><td>Bottled water</td><td>Available as required – commercial supply</td></tr><tr><td>Non-potable</td><td>108,750 (for 9 months)</td><td>Truck delivery</td><td>Available as required at most convenient delivery point (to be defined by EPC contractor or subcontractors).</td></tr></table> Water sourcing will be an aspect of the project determined by a competitive tender process. It is proposed that the quantities and sources be fully detailed within the construction environmental management plan to be developed prior to impacts, and requiring approval from Department of Planning and Environment The proponent has consulted with the Local Water Utility (Parkes Shire Council) regarding water availability. Geoff Porter (Parkes Shire Council Engineering Services) advised verbally on 19 May 2016, that there will be	Water quality	Annual construction water requirement (kL)	Potential sources	Availability	Potable (drinking)	30 (for 9 months)	Bottled water	Available as required – commercial supply	Non-potable	108,750 (for 9 months)	Truck delivery	Available as required at most convenient delivery point (to be defined by EPC contractor or subcontractors).
Water quality	Annual construction water requirement (kL)	Potential sources	Availability										
Potable (drinking)	30 (for 9 months)	Bottled water	Available as required – commercial supply										
Non-potable	108,750 (for 9 months)	Truck delivery	Available as required at most convenient delivery point (to be defined by EPC contractor or subcontractors).										

	sufficient water capacity to support construction of the project (108,750 kL of non-potable water). To provide certainty, the proponent has committed to additional mitigation measures as follows: <i>The quantities and sources of construction water would be fully detailed within the construction environmental management plan to be developed prior to impacts. The plan would be developed with input from DPI Water.</i> <i>The quantities and sources of water required during operation would be fully detailed within the operation environmental management plan to be developed prior to impacts. The plan would be developed with input from DPI Water.</i>
Source and security of water supply - operation	The Department requires that water sources for operation to be confirmed before approval is granted. Water quantities are not estimated in the EIS for operation but are stated as being minimal; required for staff amenities at the control and maintenance building and panel cleaning. The proponent has consulted with the Local Water Utility (Parkes Shire Council) regarding water availability. Geoff Porter (Parkes Shire Council Engineering Services) advised verbally on 19 May 2016, that there will be sufficient water capacity to support construction of the project (108,750 kL of non-potable water). As above, water sourcing will be an aspect of the project determined by a competitive tender process. It is proposed that the quantities and sources be fully detailed within the <i>operational</i> environmental management plan to be developed prior to operation, and requiring approval from Department of Planning and Environment. The following additional commitment is included in this revised mitigation measures: <i>The quantities and sources of water required during operation would be fully detailed within the operation environmental management plan to be developed prior to impacts. The plan would be developed with input from DPI Water.</i> <i>The quantities and sources of water required during operation would be fully detailed within the operation environmental management plan to be developed prior to impacts. The plan would be developed with input from DPI Water.</i>
Proposed changes to groundwater infrastructure	Bore water extraction is deemed unlikely for the proposed project (EIS Page 96). Both are private bores on private property. An additional commitment is proposed: <i>If any changes to the bore infrastructure are necessary, and have not been considered under the current project proposal, consultation with DPI Water will be made to ensure compliance with the Water Management Act 2000.</i>
Impacts on dams waterfront land	Additional detail would be added to the Soil and Water Management Plan commitment as follows: <i>Any impacts on farm dams and water front land (Ridgely Creek) would be detailed with the Soil and Water Management Plan, including reference to DPI's Guidelines for Activities on Waterfront Land (DPI 2012) where relevant.</i>

Development management plan in regards to modification of dams and drainage paths

All proposed activities will be managed in accordance with the Managing Urban Storm water: soils and construction series as defined in Section 7.1.2. of the EIS.

A soil and water management Plan will also be implemented, as above, in consultation with DPI.

2.4.4 DPI Agriculture

Issue	Response
Aerial spraying	There have been no risks identified to aerial spraying operations from the development of the solar farm. The infrastructure is low (below 3m) and would not constitute a hazard to aircraft due to either height or reflectivity / glare. That latter is discussed in Section 6.3 of the EIS and the dedicated Visual Impact Assessment, Appendix E. As stated in Section 6.3 the EIS: <i>...The potential for glare associated with non-concentrating photovoltaic systems which do not involve mirrors or lenses is relatively limited. PV solar panels are designed to reflect as little sunlight as possible (generally around 2% of the light received; Spaven Consulting 2011), resulting in negligible glare. The reason for this is that PV panels are designed to absorb as much solar energy as possible in order to generate the maximum amount of electricity or heat. The panels will not generally create noticeable glare compared with an existing roof or building surfaces (NSW Department of Planning 2010).</i> It is possible that build-up of spray drift on the panels may affect their yield, in which case additional clearing may be required. Periodic cleaning of panels is described in the project description and assessed in terms of water requirements and potential to generate soil and water impacts.
Decommissioning Environmental Management Plan	To address the concerns addressed by DPI Agriculture, the following provisions are now proposed to be added to this commitment: <i>The Decommissioning Environmental Management Plan will outline rehabilitation objectives and strategies for returning the land to agricultural production (or alternate use) prior to project implementation.</i>

2.4.5 Fire and Rescue NSW (FRNSW)

Issue	Response
Requirement for and Emergency Response Plan (ERP)	The Department notes that a comprehensive emergency response plan (ERP) should be developed to address the unique electrical hazard risks of the project. The proponent commits to the following additional mitigation measure to address this issue: • Prior to operation, a comprehensive emergency response plan would be prepared to include but not be limited to: ○ A risk assessment to determine unique hazards specific to the site. ○ Address foreseeable on-site and off-site fire events and other emergency incidents (e.g. fires involving solar arrays, bushfires in the immediate vicinity or potential hazmat incidents). ○ Address risks to the health and safety of firefighters and other emergency first responders (for example the level of personnel protective clothing and equipment that must be worn, evacuation zones and a safe method of shutting down and isolating the photovoltaic system). ○ Address other risk control measures in a fire emergency. ○ A requirement to provide two copies of the ERP to be stored in a prominent 'emergency information cabinet' located in a position directly adjacent to the sites main entry points. ○ A requirement to make contact with the relevant local emergency management committee (LEMC).

2.4.6 RMS

Issue	Response
Traffic management plan	The EIS already commits to the preparation of a Traffic Management Plan (TMP) as follows: <i>A Traffic Management Plan would be developed as part of the CEMP, with input from the road authorities and Parkes Shire Council. The plan would include, but not be limited to:</i> • <i>Assessment of road condition prior to construction on all local roads that would be utilised.</i> • <i>A program for monitoring road condition, to repair damage exacerbated by the construction and decommissioning traffic.</i> • <i>The designated routes of construction traffic to the site.</i> • <i>Carpooling/shuttle bus arrangements to minimise vehicle numbers during construction.</i> • <i>Scheduling of deliveries.</i> • <i>Community consultation regarding traffic impacts for nearby residents.</i> • <i>Consideration of cumulative impacts.</i> • <i>Traffic controls (speed limits, signage, etc.).</i>

	• <i>Procedure to monitor traffic impacts and adapt controls (where required) to reduce the impacts.</i> • <i>Providing a contact phone number to enable any issues or concerns to be rapidly identified and addressed through appropriate procedures.</i> To address the additional issues identified by RMS, the following provisions are now proposed to be added to this commitment: • <i>Procedures to monitor and ensure compliance.</i> • <i>Origin, number, size, frequency and destination of vehicles accessing/exiting the site.</i> • <i>Loads, weights and lengths of haulage and construction related vehicles and the number of movements of such vehicles.</i> • <i>Existing background traffic, peak hour volumes and types and their interaction with projected development related traffic.</i> • <i>The management and coordination of construction and staff vehicle movements to the site and measures to limit disruption to other motorists.</i> • <i>Scheduling of haulage vehicle movements to minimise convoy lengths or platoons.</i> • <i>Consideration is to be given to minimise the route length for road transport of all over size and over mass loads.</i> • <i>Details of intersection improvement works in accordance with Austroads Guide to Road Design and RMS supplements.</i> • <i>Local climate conditions that may affect road safety for vehicles used during construction, operation and decommissioning of the project (eg fog).</i> The detailed TMP would form part of the environmental management documentation required to be submitted to Department of Planning and Environment prior to construction.
Intersection up-grade	To address this issue more completely, it is proposed to add the following mitigation measures: • <i>Prior to works commencing agree a Works Authorisation Deed between the developer and RMS.</i> • <i>Prior to commencement of construction work, contact RMS's Traffic Operations Coordinator to determine whether a Road Occupancy Licence is required and if required, obtain the Road Occupancy Licence prior to works commencing within 3 metres of the travel lanes in Henry Parkes Way.</i>

2.4.7 Parkes Shire Council

Issue	Response
Farmland amenity	The EIS has assessed noise, visual and environmental impacts on all residences in close proximity to the development site (Section 6 of the EIS). Amenity impacts will be addressed through noise and visual management plans. No further mitigation measures are considered to be required.
Bushland Buffers/Offsets	Provisions have been made for native vegetation buffering of the development site from nearby roads and dwellings. More detailed information is provided in Section 6.4, 6.5 and Appendix E in the EIS. No further mitigation measures are considered to be required.
Bushfire hazard mitigation	A Bush Fire Management plan is to be developed with the aid of the RFS as outlined in section 7.9.3 of the EIS. This includes the management of fuel loads onsite. No further mitigation measures are considered to be required.
Weed management	A Weed Management Plan is to be developed for the site to prevent/minimise the spread of weeds in and between sites (Section 8.2 of the EIS). This would include: • Management protocol for declared noxious weeds as stipulated by the <i>Noxious Weeds Act 1993</i> during and post construction (e.g. Chilean Needle Grass) • A protocol for weed hygiene in relation to plant, machinery and importation and management of fill • Any occurrences of pathogens such as Myrtle Rust and Phytophthora would be monitored, treated and reported. No further mitigation measures are considered to be required.
Environmental Management Plan	The framework for the environmental management is detailed in Section 6 and 7 of the EIS. All commitments and environmental safeguards would be managed through the implementation of a Project Environmental Management Plan, consisting of a CEMP, an Operation Environmental Management Plan and a Decommissioning Environmental Management Plan. These plans would be prepared sequentially, prior to each stage of works. These plans would detail the environmental management responsibilities of specific staff roles, reporting requirements, monitoring requirements, environmental targets and objectives, auditing and review timetables, emergency responses, induction and training, complaint response procedures and adaptive management mechanisms to encourage continuous improvement. No further mitigation measures are considered to be required.
Access and Traffic	Figure 3 below illustrates the location of the Travelling Stock Reserve which crosses the Pat Meredith Drive road reserve (Lot 7002 DP94814). Consultation with Central West Local Land Services requests fencing around the Travelling Stock Reserve at Pat Meredith Drive as part of the proposal (see Section 2.5). The proponent will consult with Parkes Shire Council and Central West Local Land Services regarding the requirement to create a road reserve along the

	relevant section of Pat Meredith Drive (it may not be a requirement of Central West Local Land Services). All other Council requirements are consistent within Section 7.3 of the EIS. While the Council's recommendations are noted, the proponent commits to an objective-oriented TMP that requires consultation with the roads authorities (including Council), rather than introducing overly prescriptive that may result in the proponent having to commit to works that would not be required as a result of the developed site. No further mitigation measures are considered to be required.
Primary Production Lands	Consideration has been given to these matters in Section 7.6 of the EIS. While it is acknowledged that the site has high agricultural values that could not be utilized for the operational life of the solar farm, it is noted that the proposal is highly reversible and that no long term impact on the capability of the land is expected, post decommissioning. Additionally, the proponent now commits to: <i>The Decommissioning Environmental Management Plan will outline rehabilitation objectives and strategies for returning the land to agricultural production (or alternate use) prior to project implementation.</i>
Community contributions	The proponent commits to: <i>A community fund will be established by the developer to provide annual funding for community projects.</i>

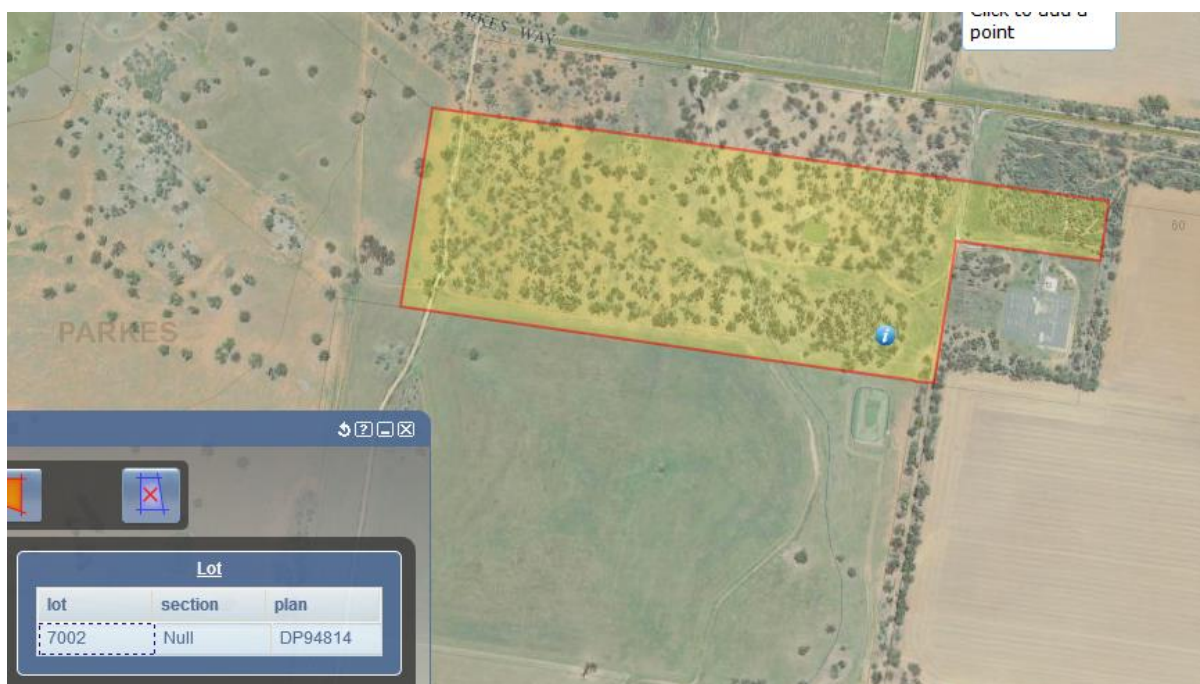


Figure 3 Travelling stock route

2.5 CENTRAL WEST LOCAL LAND SERVICES – EIS CONSULTATION RESPONSE

On 4 April 2016 Central West Local Land Services provided environmental assessment requirements for the proposal which are discussed below. Figure 4 illustrates elements within the Travelling Stock Reserve.

1. Passage through the Currajong Travelling Stock Reserve is currently used to access the property on which the solar farm will be located. This reserve is used for travelling stock periodically. It was used twice last year by a travelling mob of 800 head. It will be used in a fortnight by another mob of similar size.

When mobs reach the reserve, they generally stay a couple of days using the water supply before the walk into Parkes. As such cows amble across Pat Meredith Drive and around the existing sub-station. The gates to the farm are rarely used and remain closed when stock are present.

CWLLS perceives an issue for semi-supervised cattle during the construction phase when numbers of vehicles will be using Pat Meredith Drive. It will be impossible to keep gates closed and even a heavy duty ramp may not carry the weight of construction cranes etc. (Ramps are not always a deterrent to some livestock.) Cattle will enter and proceed down the lane towards the solar farm resulting in ongoing issues with vehicles and construction.

During operational phase, similar issues may occur.

CWLLS requests that Pat Meredith Drive be fenced as part of the proposal, extending from the existing property boundary (in the south) to the edge of the road corridor (in the north). It would suit CWLLS to locate this fence 10m. off Pat Meredith Drive to limit the loss of cattle feed, however it may be as efficient to fence the existing powerline easement.

CWLLS raises that a fence running directly to a busy road creates considerable risk at its end point (where cattle go around it). Hence CWLLS advises that a dogleg fence should be constructed with a wing extending west to the edge of Ridgy Creek. (Total length approx. 700 m.) That would provide safety with the drover locating camp and observation point at Ridgy Creek end of the fence, with knowledge that traffic and cattle over by the substation cannot collide.



Figure 4 Location of proposed fence (green) within Travelling stock route

Response

As a new commitment:

- **Neoen to propose suitable stock fencing (as per green line on Figure 4) and new gate at a suitable location that suits the construction access requirements (and operation if required).**

2. CWLLS seeks to ensure that two potential impacts of the enlargement of the sub-station site does not affect our operations and environmental values.

i. The substation site appears to have room for expansion without further encroachment on the Reserve. If however the size of the sub-station is increased, CWLLS requests that this be onto the private property to the east of the existing location.

ii. Currently several powerline easements dissect the Reserve. CWLLS requests that no further mature trees are lost from the Reserve by the creation of additional easements. Duplication of powerlines along existing easements is preferred. Placing additional easements over the cleared farmland outside the Reserve is also preferred.

Response

The EIS assesses the impact on species found within the Reserve as the construction and operation of a power plant and substation seems certain to impact mature trees.

No expansion of the substation is required, that would require any vegetation clearing. The changes will occur within the existing fenced perimeter of the substation.

3. Consideration that the apparent vacant bushland is in fact a working environment must be a focus during the construction phase. CWLLS requests that the Reserve (along Pat Meredith Drive) not be used to stockpile materials that may injure an animal or its drover. Such materials range from batteries to sharp edged objects. Cattle are inquisitive and without enough intelligence to save themselves.

Response

As a new commitment:

- **Neoen commits to locating stockpiles and compounds outside of the TSR.**

4. CWLLS has a water supply dam in the middle of the Currajong Reserve. Water harvesting by the proponent will only impact our catchment if drainage along Pat Meredith Drive is altered. CWLLS requests that the existing catchment of the existing dam is not altered by road construction.

Flooding on Ridgely Creek provides most of the periodic food supply of this Reserve. CWLLS would not like to see that modified by upstream water harvesting.

Response

Section 7.2 Water use and water quality (surface and groundwater) and hydrology in the EIS address site drainage. This includes identifying the location of dams in the nearby vicinity of the project.

The solar farm would be designed so that there is minimal change to the natural water flow on the site. During construction, dirty water would be collected and treated before water leaving the site or entering waterways. Construction impacts would be managed in accordance with the Managing Urban Storm water: soils and construction series. A soil and water management Plan will also be implemented to ensure all care is taken.

During operation, no water diversion or alteration to existing run off is proposed. Rain water landing on panels would disperse in front of the panels and is expected to have a minor impact on local drainage and dam levels. Ground cover management is key to ensuring the areas beneath the panels do not become bare and develop erosion changes that may alter run off patterns.

In addition Neoen commits to:

- ***Any work undertaken by Neoen that would have a potential impact on the drainage along Pat Meredith Drive (for instance sealing part of the road which would make it impermeable) will be designed in consultation with LLS, ensuring that the impact on drainage will be acceptable.***
- ***No water harvesting upstream of Ridgely Creek.***

5. CWLLS requests consideration of light and noise impacts on resting cattle at night. A holding yard is located west of Ridgely Creek for night mustering. Consideration is needed of impacts that may spook cattle. Whilst constant light should not be an issue, lights of shift workers car passing along Pat Meredith Drive may be. Similarly, constant noise is not usually an issue, but a crack like an arcing electrical current could be extremely problematic.

Response

Construction work will not take place at night.

Neoen advises that a crack like an arcing electrical current would not occur under normal circumstances during the operation of the solar farm. Any occurrence of an arcing electrical current would be unlikely and would be an isolated event.

3 REVISED MITIGATION MEASURES: SUMMARY

This submissions report proposes a number of changes to the safeguards and mitigation measures detailed in the EIS. These changes are summarised below. It is noted that the final detail of the construction and operational management measures will need to reflect the final detailed project design. As many elements of the detailed design will be determined in a competitive tender process, the commitments below are objective-oriented and require consultation, rather than being overly prescriptive at this stage. Some measures are of interest to several agencies and therefore, development of plans in consultation with these agencies is proposed. For example:

- Traffic management in consultation with RMS and Parkes Shire Council.

Table 3-1 Changes to the proposal's mitigation strategies

Impact area	New / modified measure
Screening and rehabilitation:	• <i>Additional screening in consultation with affected landholders for all dwellings within 2 km, to address views from dwellings or house yards.</i>
Rehabilitation	• <i>The Decommissioning Environmental Management Plan will outline rehabilitation objectives and strategies for returning the land to agricultural production (or alternate use) prior to project implementation.</i>
Biodiversity – EEC impacts	• <i>Minimise EEC impacts via detailed design including relocation of the car park and site office and enhancement of the Grey Box community in this part of the site.</i>
Biodiversity – paddock trees	• <i>Use the BioBanking Paddock Tree Calculator to quantify the impact on paddock trees and inform offset requirements.</i> • <i>Retained areas of planted native vegetation are to be expanded accordingly.</i>
Pine Donkey Orchid	• <i>Targeted surveys in August - September 2016 for the Pine Donkey orchid. If detected and this species cannot be avoided, it would be offset in accordance with the BCC.</i>
Water usage and availability	• <i>The quantities and sources of construction water would be fully detailed within the construction environmental management plan to be developed prior to impacts. The plan would be developed with input from DPI Water.</i> • <i>The quantities and sources of water required during operation would be fully detailed within the operation environmental management plan to be developed prior to impacts. The plan would be developed with input from DPI Water.</i>

Impact area	New / modified measure
Aboriginal heritage	• <i>Prepare a Cultural Heritage Management Plan (CHMP) in consultation with the registered Aboriginal parties that incorporates the following:</i> • <i>Prepare with input from the Wiradjuri Council of Elders.</i>
Soil and water management plan	• <i>A soil and water management plan, and erosion and sediment control plans, would be prepared with input from DPI, implemented and monitored during the project, in accordance with Landcom (2004), to minimise soil (and water) impacts. These plans would include provisions to:</i>
Groundwater bores	• <i>If any changes to the bore infrastructure are necessary, and have not been considered under the current project proposal, consultation with DPI Water will be made to ensure compliance with the Water Management Act 2000.</i>
Farm dams and waterfront land	Additional detail would be added to the Soil and Water Management Plan commitment as follows: • <i>Any impacts on farm dams and water front land (Ridgey Creek) would be detailed with the Soil and Water Management Plan, including reference to DPI's Guidelines for Activities on Waterfront Land (DPI 2012) where relevant.</i>
Emergency response	• <i>Prior to operation, a comprehensive emergency response plan would be prepared to include but not be limited to:</i> ○ <i>A risk assessment to determine unique hazards specific to the site.</i> ○ <i>Address foreseeable on-site and off-site fire events and other emergency incidents (e.g. fires involving solar arrays, bushfires in the immediate vicinity or potential hazmat incidents).</i> ○ <i>Address risks to the health and safety of firefighters and other emergency first responders (for example the level of personnel protective clothing and equipment that must be worn, evacuation zones and a safe method of shutting down and isolating the photovoltaic system).</i> ○ <i>Address other risk control measures in a fire emergency.</i> ○ <i>A requirement to provide two copies of the ERP to be stored in a prominent 'emergency information cabinet' located in a position directly adjacent to the sites main entry points.</i> ○ <i>A requirement to make contact with the relevant local emergency management committee (LEMC).</i>
Traffic Management Plan	The Traffic Management Plan would have the following provisions added: • <i>Procedures to monitor and ensure compliance.</i> • <i>Origin, number, size, frequency and destination of vehicles accessing/exiting the site.</i>

Impact area	New / modified measure
	• <i>Loads, weights and lengths of haulage and construction related vehicles and the number of movements of such vehicles.</i> • <i>Existing background traffic, peak hour volumes and types and their interaction with projected development related traffic.</i> • <i>The management and coordination of construction and staff vehicle movements to the site and measures to limit disruption to other motorists.</i> • <i>Scheduling of haulage vehicle movements to minimise convoy lengths or platoons.</i> • <i>Consideration is to be given to minimise the route length for road transport of all over size and over mass loads.</i> • <i>Details of intersection improvement works in accordance with Austroads Guide to Road Design and RMS supplements.</i> • <i>Local climate conditions that may affect road safety for vehicles used during construction, operation and decommissioning of the project (eg fog).</i>
Intersection upgrade	• <i>Prior to works commencing agree a Works Authorisation Deed between the developer and RMS.</i> • <i>Prior to commencement of construction work, contact RMS's Traffic Operations Coordinator to determine whether a Road Occupancy Licence is required and if required, obtain the Road Occupancy Licence prior to works commencing within 3 metres of the travel lanes in Henry Parkes Way.</i>
Community contributions	• <i>A community fund will be established by the developer to provide annual funding for community projects.</i>
Travelling Stock Reserve	• <i>Stock fencing and new gate proposed at a suitable location to accommodate stock construction access requirements (and operation if required).</i> • <i>Stockpiles and compounds will be located outside of the TSR.</i> • <i>Any work undertaken having a potential impact on the drainage along Pat Meredith Drive (for instance sealing part of the road which would make it impermeable) will be designed in consultation with LLS, ensuring that the impact on drainage will be acceptable.</i> • <i>No water harvesting upstream of Ridgely Creek.</i>

The measures are now included in the revised safeguards and mitigation measures, included as Appendix A of this report.

4 CONCLUSION

This Submissions Report responds to the issues raised in submissions from the community and government agencies, following the public exhibition of the Parkes Solar Farm EIS.

In response to the submissions, additional safeguards and mitigation measures have been developed and would form part of the project. These relate to the following key impact areas:

- Aboriginal heritage
- Biodiversity (including screening)
- Rehabilitation
- Soil and water
- Traffic and access
- Fire and emergency response
- Additional requirements from Parkes Shire Council

This Submissions Report fulfils the requirements of Section 75H of the *Environmental Planning and Assessment Act 1979*.

In consideration of the assessment of the impacts from the project contained in the EIS and the proposed mitigation measures committed to in the full set of revised safeguards and mitigation measures (included as Appendix A), it is believed that all relevant issues and concerns have been addressed and that the project should now proceed for approval by the Minister.

APPENDIX A FULL SET OF REVISED SAFEGUARDS AND MITIGATION MEASURES

Safeguards and mitigation measures	C	O	D
Develop a Flora and Fauna Management Plan (FFMP) for incorporation of construction related environmental management safeguards.	C		
EEC areas to be retained would be delineated, and construction activities would be excluded from these areas.	C		
Minimise clearing of EECs, namely 'White Box–Yellow Box–Blakely's Red Gum Woodland'. Clearing and construction contractors should be given inductions that make clear the importance of the sensitive area habitat and its species.	C		
Minimise EEC impacts via detailed design including relocation of the car park and site office and enhancement of the Grey Box community in this part of the site.	C		
Use the BioBanking Paddock Tree Calculator to quantify the impact on paddock trees and inform offset requirements.	C		
Retained areas of planted native vegetation are to be expanded accordingly.	C		
Targeted surveys in August - September 2016 for the Pine Donkey orchid. If detected and this species cannot be avoided, it would be offset in accordance with the BCC.	C		
Where trees are to be retained, an adequate tree protection zone (TPZ) will be provided around each tree for the duration of construction from construction activities, including excavation, vehicle parking and stockpiles. Details for calculating TPZs are provided within <i>Australian Standard 4970-2009 – Protection of trees on development sites</i>.	C		
Prior to the commencement of work, a physical vegetation clearing boundary at the approved clearing limit is to be clearly demarcated and implemented. This will include environmentally sensitive areas such as EECs. The delineation of such a boundary may include the use of temporary fencing, flagging tape, parawebbing or similar.	C		
A pre-clearing process will be implemented before clearing begins. Pre-clearing surveys will be carried out by an ecologist and will include general fauna surveys, general tree hollow inspections and dam/waterway inspections. Habitat trees will be clearly marked with flagging tape.	C		
When programming the works, consider breeding periods of fauna that may be impacted.	C		
An unexpected threatened species finds procedure will be developed before clearing commences.	C		
- A 'Clearing and Grubbing Plan' will be developed to: ➤ include best practice methods for the removal of woody vegetation and non-woody vegetation. ➤ Trees will be removed in such a way as not to cause damage to surrounding vegetation. Root systems of trees and shrubs to be removed will be retained in-ground to ensure surrounding ground layer vegetation is undisturbed and to prevent soil erosion. ➤ Require that where work cannot avoid encroaching into the TPZ, it not impinge on the structural root zones (SRZ) of trees to be retained. Details for calculating the SRZs are provided within <i>Australian Standard 4970-2009 – Protection of trees on development sites</i>. ➤ Where possible, trees to be removed will be mulched on-site and re-used to stabilise disturbed areas.	C		

Safeguards and mitigation measures	C	O	D
➤ Tree clearing protocol, that includes staged habitat removal, and a requirement for an ecologist being present during tree-felling of all hollow-bearing trees to ensure that any potential impacts on fauna are minimised			
• Any fallen timber, dead wood and bush rock (if present) encountered on site will be left in situ or relocated to a suitable place nearby. Rock will be removed with suitable machinery so as not to damage the underlying rock or result in excessive soil disturbance.	C		
- A Weed Management Plan would be developed for the sites to prevent/minimise the spread of weeds in and between sites. This would include: ➤ Management protocol for declared noxious weeds as stipulated by the <i>Noxious Weeds Act 1993</i> during and post construction (e.g. Chilean Needle Grass) ➤ A protocol for weed hygiene in relation to plant, machinery and importation and management of fill ➤ Any occurrences of pathogens such as Myrtle Rust and Phytophthora would be monitored, treated and reported.	C		
• use non barbed-wire on exterior fencing		O	
• Use of reflective power line marking balls on any overhead transmission lines		O	
• Use of 'fauna friendly' lighting		O	
• Native vegetation should be re-established in disturbed areas post-construction.		O	
Prepare a Cultural Heritage Management Plan (CHMP) in consultation with the registered Aboriginal parties that incorporates the following; • Prepare with input from the Wiradjuri Council of Elders. • Where avoidance of the recorded artefacts within the proposal area is not possible, the artefacts would be collected and moved to a safe area within the property, as close as possible to their original location, but which will not be subject to ground disturbance. The collection and relocation should be undertaken by representatives of the registered Aboriginal parties. A new AHIMS site card will need to be completed identifying the new location of the moved artefacts. • Incorporates an unexpected finds protocol to allow for management of finding additional Aboriginal artefacts during the construction of the solar farm. • Includes a protocol where, in the unlikely event that human remains are discovered during the construction, all work must cease. OEH, the local police and Peak Hill LALC should be notified. Further assessment would be undertaken to determine if the remains were Aboriginal or non-Aboriginal.	C		
Design measures: • If feasible, underground rather than overhead power lines would be considered. • If feasible, co-location of powerlines would be undertaken to minimise the look of additional power poles. If additional poles are required, these would match existing pole design as much as possible. • The materials and colour of onsite infrastructure will, where practical, be non-reflective and in keeping with the materials and colouring of existing infrastructure or of a colour that will blend with the landscape. Where practical, buildings will non-reflective and in eucalypt green, beige or muted brown. Pole mounts will be non-reflective. Security fencing posts and wire would be non-reflective; green or black rather than grey would reduce the industrial character of the fence.	C		

Safeguards and mitigation measures	C	O	D
Screening: - Onsite planting within the solar farm boundaries would be considered for five residences identified with potential for high to medium level impacts; Viewpoints 2, 3, 6 and 16. - Planting requirements are outlined in the VIA and would be detailed fully within an appropriate management plan. - Screens would be maintained for the operational life of the solar farm, including replacing dead plants and weeding, as required to maintain the screen's effectiveness in breaking up views. - Additional screening in consultation with affected landholders for all dwellings within 2 km, to address views from dwellings or house yards.		O	
A verification process would be implemented within 2 months of the completion of the construction phase. A Visual Verification Report and Landscape Plan would: - Confirm the assumptions of this assessment by ground based assessment and ensure all medium to high impacts are mitigated. - Finalise the location and species for proposed screening, in consultation with nearest affected landholders and roads authority, where relevant. - Detail planting methods and maintenance requirements of the screen planting.		O	
Plant and equipment to be properly maintained.	C		
Avoid unnecessary noise when carrying out manual operations and when operating plant.	C		
Switch of any equipment not in use for extended periods.	C		
Establish good relations with people living in the vicinity of the site at the beginning of project and maintain. Keep people informed, take complaints seriously, deal with complaints expeditiously. The community liaison member of staff should be adequately experienced.	C		
Ground cover would be established and maintained beneath the array area as much as possible prior to and during construction, to minimise areas exposed to erosion.	C		
Areas of disturbed soil would be rehabilitated promptly and progressively during construction.	C		
A Ground cover management plan would be developed include and monitoring and triggers for action, to address any bare areas and erosion that develop beneath the array.		O	
A soil and water management plan, and erosion and sediment control plans, would be prepared with input from DPI, implemented and monitored during the project, in accordance with Landcom (2004), to minimise soil (and water) impacts. These plans would include provisions to: - At the commencement of the works, and progressively during construction, install the required erosion control and sediment capture measures. - Regularly inspect erosion and sediment controls, particularly following rainfall. - Maintain a register of inspection and maintenance of erosion control and sediment capture measures. - Ensure that machinery arrives on site in a clean, washed condition, free of fluid leaks. - Ensure that machinery leaves the site in a clean condition to avoid tracking of sediment onto public roads which may cause risks to other road users through reduced road stability.	C		D

Safeguards and mitigation measures	C	O	D
- In all excavation activities, separate subsoils and topsoils and ensure that they are replaced in their natural configuration to assist revegetation. - Stockpile topsoil appropriately, so as to minimise weed infestation, maintain soil organic matter, maintain soil structure and microbial activity. - Minimise the area of disturbance from excavation and compaction. - Ensure any discharge of water from the site is managed to ensure ANZECC (2000) water quality criteria are met. - Manage traffic generated soil erosion. - Manage works in consideration of heavy rainfall events; if a heavy rainfall event is predicted, the site should be stabilised and work ceased until the wet period had passed. - Minimise impacts to farm dams and water front land (Ridgey Creek) with reference to DPI's Guidelines for Activities on Waterfront Land (DPI 2012) where relevant.			
- The quantities and sources of construction water would be fully detailed within the construction environmental management plan to be developed prior to impacts. The plan would be developed with input from DPI Water. - The quantities and sources of water required during operation would be fully detailed within the operation environmental management plan to be developed prior to impacts. The plan would be developed with input from DPI Water.	C	O	
A Spill Response Plan would be developed as part of the overall Risk Management Plan to prevent contaminants affecting adjacent surrounding environments. It would: - Manage the storage of any potential contaminants onsite. - Mitigate the effects of soil contamination by fuels or other chemicals (including emergency response and EPA notification procedures and remediation).	C	O	D
A protocol would be developed in relation to discovering buried contaminants within the proposal site (e.g. pesticide containers). It would include stop work, remediation and disposal requirements.	C		D
Dust suppression: A water cart (truck) would be utilised, wetting access roads and exposed dusty surfaces in response to visual cues, as required. This includes stockpiled materials that exhibit significant dust lift. Stockpiles may be covered in preference to wetting. Stabilising techniques and/or environmentally acceptable dust palliatives may be utilised in preference to wetting or covering areas that generate dust.	C		D
- Any area that was temporarily used during construction (laydown and trailer complex areas) would be restored back to original condition or re-vegetated with native plants. - Areas that may not have been hard packed but have been disturbed in some form would be treated with environmentally acceptable dust palliatives and / or vegetated (e.g. by means of hydro seeding) with a suitable seed mix.		O	
If any changes to the bore infrastructure are necessary, and have not been considered under the current project proposal, consultation with DPI Water will be made to ensure compliance with the Water Management Act 2000.	C		
All staff would be appropriately trained through toolbox talks for the minimisation and management of accidental spills.	C	O	D
All fuels, chemicals, and liquids would be stored at least 50 m away from any waterways or drainage lines and would be stored in an impervious bunded area.	C	O	D

Safeguards and mitigation measures	C	O	D
Adequate incident management procedures will be incorporated into the Construction Environmental Management Plan, including requirement to notify EPA for incidents that cause material harm to the environment (refer s147-153 Protection of the Environment Operations Act).	C	O	D
The refuelling of plant and maintenance of machinery would be undertaken in impervious bunded areas.	C	O	D
Machinery would be checked daily to ensure there is no oil, fuel or other liquids leaking from the machinery. All staff would be appropriately trained through toolbox talks for the minimisation and management of accidental spills	C		D
A Haulage Plan would be developed with input from the roads authority, including but not limited to: • Assessment of road routes to minimise impacts on transport infrastructure • Scheduling of deliveries of major components to minimise safety risks (on other local traffic) • Traffic controls (signage and speed restrictions etc.).	C		D
A Traffic Management Plan would be developed as part of the CEMP, with input from the road authorities and Parkes Shire Council. The plan would include, but not be limited to: • Assessment of road condition prior to construction on all local roads that would be utilised. • A program for monitoring road condition, to repair damage exacerbated by the construction and decommissioning traffic. • The designated routes of construction traffic to the site. • Carpooling/shuttle bus arrangements to minimise vehicle numbers during construction. • Scheduling of deliveries. • Community consultation regarding traffic impacts for nearby residents. • Consideration of cumulative impacts. • Traffic controls (speed limits, signage, etc.). • Procedure to monitor traffic impacts and adapt controls (where required) to reduce the impacts. • Providing a contact phone number to enable any issues or concerns to be rapidly identified and addressed through appropriate procedures. • Procedures to monitor and ensure compliance. • Origin, number, size, frequency and destination of vehicles accessing/exiting the site. • Loads, weights and lengths of haulage and construction related vehicles and the number of movements of such vehicles. • Existing background traffic, peak hour volumes and types and their interaction with projected development related traffic. • The management and coordination of construction and staff vehicle movements to the site and measures to limit disruption to other motorists. • Scheduling of haulage vehicle movements to minimise convoy lengths or platoons. • Consideration is to be given to minimise the route length for road transport of all over size and over mass loads.	C		D

Safeguards and mitigation measures	C	O	D
- Details of intersection improvement works in accordance with Austroads Guide to Road Design and RMS supplements. - Local climate conditions that may affect road safety for vehicles used during construction, operation and decommissioning of the project (eg fog).			
The proponent would consult with the Parkes Shire Council regarding the proposed upgrading of Pat Meredith Road. The upgrade would be subject to detailed design, and must be designed and constructed to the standards specified by the Parkes Shire Council	C		
- Prior to works commencing agree a Works Authorisation Deed between the developer and RMS. - Prior to commencement of construction work, contact RMS's Traffic Operations Coordinator to determine whether a Road Occupancy Licence is required and if required, obtain the Road Occupancy Licence prior to works commencing within 3 metres of the travel lanes in Henry Parkes Way.	C		
The proponent would repair any damage resulting from project traffic (except that resulting from normal wear and tear) as required at the proponent's cost.	C	O	D
Development of a complaints procedure to promptly identify and respond to issues generating complaints.	C	O	D
Protocols to guide vehicle and construction equipment use, to minimise emissions would be included in construction and operational environmental management plans. This would include but not limited to Australian standards and (POEO Act).	C	O	D
Protocols would be included in construction and decommissioning to minimise and treat dust (water carts or similar in response to visual cues). This may involve installation of barriers such as shade cloth, to protect receivers.	C		D
All design and engineering would be undertaken by qualified a competent persons with the support of specialists as required.	C		
Transmission lines would be located as far as practical from residences, farm sheds, and yards in order to reduce the potential for both chronic and acute exposure to EMFs.	C		
Design of electrical infrastructure would minimise EMFs.	C		
A community fund will be established by the developer to provide annual funding for community projects.	C	O	
Consultation with local community, to minimise impact of construction of adjacent agricultural activities and access.	C		
Consultation would be undertaken with Transgrid regarding connection to the substation and design of electricity transmission infrastructure.	C		
In consultation with Local Land Services regarding the Travelling Stock Reserve: - Stock fencing and new gate proposed at a suitable location to accommodate stock construction access requirements (and operation if required). - Stockpiles and compounds will be located outside of the TSR. - Any work undertaken having a potential impact on the drainage along Pat Meredith Drive (for instance sealing part of the road which would make it impermeable) will be designed in consultation with LLS, ensuring that the impact on drainage will be acceptable. - No water harvesting upstream of Ridgely Creek.			
Consultation would be undertaken with extraction licences holders to inform them of the proposed solar farm construction and operational requirements.	C		

Safeguards and mitigation measures	C	O	D
Removal of all above ground infrastructure and rehabilitation of areas disturbed during the operation of the solar farm, to allow a return to agricultural or alternate use.			D
The Community Consultation Plan would be implemented to manage impacts to community stakeholders, including but not limited to: • Protocols to keep the community updated about the progress of the project and project benefits. • Protocols to inform relevant stakeholders of potential impacts (haulage, noise etc.). • Protocols to respond to any complaints received.	C		
Liaison with local industry representatives to maximise the use of local contractors, manufacturing facilities, materials.	C		
Liaison with local representatives regarding accommodation options for staff, to minimise adverse impacts on local services.	C		D
Liaison with local tourism industry representatives to manage potential timing conflicts with local events.	C		D
A Waste Management Plan (WMP) would be developed to minimise wastes. It would include but not be limited to: • Identification of opportunities to avoid, reuse and recycle, in accordance with the waste hierarchy. • Quantification and classification of all waste streams. • Provision for recycling management onsite. • Provision of toilet facilities for onsite workers and how sullage would be disposed of (i.e., pump out to local sewage treatment plant). • Tracking of all waste leaving the site. • Disposal of waste at facilities permitted to accept the waste. • Requirements for hauling waste (such as covered loads).	C	O	D
Septic system to be installed and operated in accordance with Council's requirements.	C	O	
Develop a Bush Fire Management Plan with input from the RFS to include but not be limited to: • Management of activities with a risk of fire ignition. • Management of fuel loads onsite. • Storage and maintenance of firefighting equipment, including siting and provision of adequate water supplies for bush fire suppression. • The below requirements of <i>Planning for Bush Fire Protection 2006</i> - ○ Identifying asset protection zones ○ Providing adequate egress/access to the site ○ Emergency evacuation measures • Operational procedures relating to mitigation and suppression of bush fire relevant to the solar farm.	C	O	D

Safeguards and mitigation measures	C	O	D
Prior to operation, a comprehensive emergency response plan would be prepared to include but not be limited to: • A risk assessment to determine unique hazards specific to the site. • Address foreseeable on-site and off-site fire events and other emergency incidents (e.g. fires involving solar arrays, bushfires in the immediate vicinity or potential hazmat incidents). • Address risks to the health and safety of firefighters and other emergency first responders (for example the level of personnel protective clothing and equipment that must be worn, evacuation zones and a safe method of shutting down and isolating the photovoltaic system). • Address other risk control measures in a fire emergency. • A requirement to provide two copies of the ERP to be stored in a prominent 'emergency information cabinet' located in a position directly adjacent to the sites main entry points. • A requirement to make contact with the relevant local emergency management committee (LEMC).			
Should an item of historic heritage be identified, the Heritage Division (OEH) would be contacted prior to further work being carried out in the vicinity.	C	O	D
The Decommissioning Environmental Management Plan will outline rehabilitation objectives and strategies for returning the land to agricultural production (or alternate use) prior to project implementation.			

APPENDIX B SUBMISSIONS IN FULL

From: system@accelo.com on behalf of [Ken Keith](#)
To: [Diana Charteris](#)
Subject: Submission Details for Ken Keith of KJ & S Keith (support)
Date: Friday, 22 April 2016 5:07:39 PM

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation: no

Name: Ken Keith
Organisation: KJ & S Keith (Partner)
Email: kjkeith1@bigpond.com

Address:
"Stanleigh"

Parkes, NSW
2870

Content:

I would like to make a submission regarding the above Solar Farm as we are the adjoining neighbours on the southern and eastern side of the developments. From the outset I should advise of a level of conflict of interest as I am also the Mayor of Parkes Shire, and although not the consent authority has a strong interest in the outcome of the decision.

We have 3 issues for consideration:

1) Visual Impact.

Our house is over the hill and does not directly face the development, however the majority of our farm does. The current landscape has many tree corridors planted by the property owner of the proposed development and myself so that it is environmentally protective against strong winds, providing habitat for native flora and fauna as well as being visually appealing. When Neon presented to Council it was indicated that there would be perimeter plantings to lessen the visual impact. My reading of the plans now only sees this opposite dwellings. I would ask that a condition of consent be considered that requests a fenced corridor of trees be planted around at least the eastern and southern boundaries to link into existing tree lines to encourage wildlife movement. Landcare recommends tree corridors be of 5 lines of trees, however 3 lines would provide adequate screening in my opinion.

2) Water Run Off.

Natural water flow from the site travels in a southerly direction. The water firstly fills dams on John Smeatons blocks and then flows down a designated water course to fill a dam on my property. Given the decrease in run off events due to climate change and the potential for additional run off from the solar panels I would ask that a condition of consent be formulated that allows the existing and potential future flows of water from the site be allowed to continue in the southerly direction as they currently do.

3) Fire precautions.

Given that the adjoining subdivision power lines started a major fire that burnt all the way to Millers Lookout only a couple of years ago, fire precautions are seen as paramount. My understanding is that solar farms are reasonably safe in this regard but I beleive the undergrowth around and under the panels should be kept at a safe level. Lightning is a common cause of fire in this area. Mowing would be an expensive exercise and grazing the area with sheep on a regular basis may be good alternative. Should this be a sensible option I would be happy to discuss conditions, access and leasing options with the owners.

As a general comment I am in favour of Australia pursuing solar energy and beleive this to be best located on lower productive agricultural land. That said, I can fully understand the siting of this proposal on highly productive agricultural land because of its proximity to the sub station and distribution network.

Thank you for the opportunity to comment on this proposal.

Yours sincerely, Ken Keith OAM on behalf of KJ and S Keith.

IP Address: parkes3.lnk.telstra.net - 203.45.63.200

Submission: Online Submission from Ken Keith of KJ & S Keith (support)

https://majorprojects.affinitylive.com/?action=view_activity&id=147558

Submission for Job: #6784 Parkes Solar Farm Project

https://majorprojects.affinitylive.com/?action=view_job&id=6784

Site: #3016 Parkes Solar Farm

https://majorprojects.affinitylive.com/?action=view_site&id=3016



Planning & Environment

Planning Services

Resource Assessments

Contact: Diana Charteris

Phone: 9228 6331

Email: diana.charteris@planning.nsw.gov.au

Mr Chris Leonard
Neoen Australia Pty Ltd
Suite 3, Level 14
227 Elizabeth Street
Sydney NSW 2000

Dear Mr Leonard

Parkes Solar Farm (SSD 6784)

The public exhibition of the Environmental Impact Statement (EIS) for the Parkes Solar Farm concluded on Thursday, 28 April 2016.

The Secretary requests that you prepare and submit a report detailing your responses to all issues raised in submissions. The submissions can be viewed on the Department's website www.majorprojects.planning.nsw.gov.au.

To assist you in responding to the key issues raised in submissions, the Department has identified several areas where further assessment or additional information is required (see **Attachment A**). Please provide your response to the Department by **Thursday, 19 May 2016**.

Please also ensure that you respond to the full range of matters and recommendations raised in submissions.

If you wish to discuss this matter, please contact Diana Charteris on the above contact details.

Yours sincerely,

5/5/16

Clay Preshaw
A/Director
Resource Assessments

Attachment A

1. Traffic and transport

Both Parkes Shire Council (Council) and the Roads and Maritime Services (RMS) require road upgrades to accommodate heavy vehicle traffic movements associated with the construction of the project.

The Department agrees with this advice and requests that the Applicant confirms its acceptance of the proposed road upgrades, in consultation with Council and RMS.

2. Biodiversity and vegetation screening

a. Inland Grey Box Woodland Endangered Ecological Community

The Office of Environment and Heritage (OEH) is satisfied that the offset credit requirements have been correctly calculated using the Framework for Biodiversity Assessment (FBA). OEH recommend that the Applicant enhance the area of Inland Grey Box Woodland endangered ecological community (EEC) located in the north-west corner of the project site to meet the credit requirements. As this area of the project site is currently proposed for a car park and site office for the project, an alternative location which avoids clearing of the EEC on the project site must be considered.

The Department agrees with OEH in this regard, and requires that the Applicant:

- provide justification for any disturbance to Inland Grey Box Woodland EEC that cannot be avoided; and
- if the power line cannot be located to avoid impacts to the EEC, consider an alternative location on the project site for the car park and site office so that the impacts can be offset through enhancing the existing EEC located in this area of the project site.

b. Paddock Trees

OEH recommends that the clearing of the scattered paddock trees and the smaller line of planted vegetation running north-south in the southeast portion of the project site be offset through the expansion of the north-south line of planted vegetation.

The Department agrees with OEH in this regard, and requires that the Applicant:

- further evaluate the impact on the paddock trees proposed to be cleared using the Biobanking Paddock Tree Calculator; and
- enhance the existing line of north-south planted vegetation to meet any offset requirements.

c. Pink Donkey Orchid

As requested by OEH, if potential impacts on Pink Donkey Orchid (*Diuris tricolor*) habitat cannot be avoided (e.g. through locating the power line underground along the centre of Pat Meredith Drive) the Department requires the Applicant to further evaluate the Pink Donkey Orchid following one of the options presented in section 6.5.1.9 of the FBA.

3. Water use

As requested by the Department of Primary Industries (DPI) – Water, the Department requires the Applicant to confirm with the relevant Local Water Utility that there would be sufficient water available to support the project.

4. Landowner's consent

Under clause 49(a) of the *Environmental Planning and Assessment Regulation 2000*, the project requires landowner's consent in writing from the owners of the properties that comprise the development application.

As such, the Department requests evidence of landowner's consent for the application in writing from:

- Council, as the roads authority of the Pat Meredith Drive public road reserve;
- Central West Local Land Services (LLS), as the custodian of the Travelling Stock Route/Crown Land (Lot 7002 DP94814) traversed by Pat Meredith Drive; and
- Transgrid, as the landowner of Lot 1 DP 717829;

5. Other matters

The Department requests that the Applicant addresses the following matters:

- site decommissioning plan (raised by DPI – Agriculture);
- risk to solar panels from aerial spraying on adjacent farm land (raised by DPI – Agriculture);
and
- weed management (raised by Council).

Please note that in addition to responding to the matters detailed above, the Department requires the Applicant to acknowledge, consider and/or provide comments on all other matters raised in community and agency submissions.



DOC16/155408
SSD 6784

Ms Diana Charteris
Senior Planning Officer
Department of Planning and Environment
diana.charteris@planning.nsw.gov.au

Dear Ms Charteris

Parkes Solar Farm Project (SSD 6784)

I refer to your email dated 22 March 2016 requesting that the Office of Environment and Heritage (OEH) provide comments on the Environmental Impact Statement (EIS) for the proposed Parkes Solar Farm Project.

OEH understands that the project includes the construction, operation and eventual decommissioning of a photovoltaic 57 megavolt ampere or 65 Megawatt solar farm. It is understood that details of some components, such as the location of the transmission line that would connect the solar arrays to the power station to the north, are still being considered. It is also understood that the Department of Planning and Environment (DP&E) has requested further information from the proponent (including feedback regarding Aboriginal cultural heritage assessment), and that this is not yet available.

I recognise that the proposal has been located and designed to avoid clearing of native vegetation where possible, and that the proposal would potentially result in the clearing of 0.37 ha of Inland Grey Box Woodland Endangered Ecological Community, although it is possible that this may be avoided depending on the final design of the project.

Detailed comments and OEH's recommendations are provided in Attachment A.

If you have any questions regarding this matter, please contact Liz Mazzer on 02 6883 5325 or email liz.mazzer@environment.nsw.gov.au

Yours sincerely

DEBBIE LOVE
A/Senior Manager, Regional Operations
North West

28 April 2016

Attachment A

OEH Review of EIS: Parkes Solar Farm

Acronyms

ACH	Aboriginal Cultural Heritage
BAR	Biodiversity Assessment Report
CEEC	Commonwealth Endangered Ecological Community
EEC	Endangered Ecological Community
EIS	Environmental Impact Statement
FBA	Framework for Biodiversity Assessment
OEH	Office of Environment and Heritage
PCT	Plant Community Type
TSC Act	Threatened Species Conservation Act 1995

1 Inland Grey Box Endangered Ecological Community (EEC)

The Biodiversity Assessment Report (BAR) has identified two distinct Plant Community Types (PCTs) in the study area that would potentially be impacted by the above ground transmission line proposed to connect the solar arrays to the power station to the north:

1. Western Grey Box tall grassy woodland on alluvial loam and clay soils in the NSW South Western Slopes and Riverina Bioregions (PCT 76), of which 0.16 ha will be potentially impacted, and
2. Western Grey Box – Poplar Box – White Cypress Pine tall woodland on red loams mainly of the eastern Cobar Peneplain Bioregion (PCT 82) of which approximately 0.21 ha would be potentially impacted.

Both of these PCTs are part of the *Inland Grey Box Woodland in the Riverina, NSW South Western Slopes, Cobar Peneplain, Nandewar and Brigalow Belt South Bioregions* EEC under the TSC Act, and *Grey Box (Eucalyptus macrocarpa) grassy woodland and derived native grasslands of south-eastern Australia* CEEC.

The BAR has calculated that, if clearing is necessary, a total of 13 credits would be required to offset the impact.

Section 5.1 of the BAR states,

The only areas where an EEC would be impacted are the areas where the 'above ground transmission line' has been proposed to connect the solar arrays to the power station to the north. The proposed above ground transmission line has been designed so that it would only require the minimal amount of clearing or pruning of the EECs for construction and operation. Where the overhead power line requires offsets, then the option for boring underground, or an alternative overhead route should be considered to avoid removal or pruning of EECs. In the case that impacts can be avoided, offsetting would not be required.

There is an option to offset impacts to the Box Gum woodland EEC by retaining the Grey Box woodland EEC located within the central part of the site of the solar array, and further enhancing this

community by planting smaller trees (such as Kurrajongs) within and adjacent to this remnant vegetation. This would be subject to a Biodiversity Offset Strategy (BOS) if required.

At the site visit on 4 March 2016 and a subsequent email to Jenny Walsh of NGH Environmental on 9 March 2016, OEH staff suggested that impacts on Grey Box woodland EEC from the overhead power line could potentially be offset through enhancement of the area of Grey Box Woodland located in the north-west corner of the development site, an area which is currently proposed for a car park and site buildings for the project. At the site visit, alternative locations for the car park and site buildings were discussed (eg possibly locating these in the south-west part of the development site), however this has not been discussed in the EIS.

Recommendations

- 1.1 OEH recommends consideration of the avoidance of impacts to Grey Box EEC through alternative location and/or design of the power line connecting the solar arrays to the power station.
- 1.2 If clearing of Grey Box EEC cannot be avoided, consideration of an alternative location for the car park and site office, and enhancement of the Grey Box community in this area, is recommended.

2 Paddock Trees

Figure 5-1 of the BAR indicates that the proposal will avoid clearing of the north-south and east-west planted vegetation, and the patch of trees near the east-west planted vegetation in the south-east area of the site. OEH supports the retention of this native vegetation.

The EIS proposes to clear scattered paddock trees (Kurrajongs) and a smaller line of planted trees running north-south in the south-west portion of the solar array area.

In an email to Jenny Walsh of NGH Environmental on 26 February 2016 OEH recommended assessing the paddock trees using the BioBanking Paddock Tree Calculator. This would enable quantification of the impact on paddock trees. OEH has also recommended, both at the site visit and via email, that the loss of the paddock trees be offset through expansion of the north-south running line of planted vegetation, with the minimum quantity of trees to be added to this area determined by the Paddock Tree Calculator. These assessments have not been included in the EIS.

Recommendations

- 2.1 That the BioBanking Paddock Tree Calculator be used to quantify the impact on paddock trees and inform offset requirements
- 2.2 That retained areas of planted native vegetation be expanded accordingly.

3 Pine Donkey Orchid

The BAR notes (below Table 4-6) that the survey period was unsuitable for detecting the Pine Donkey Orchid (*Diuris tricolor*) which flowers in spring (surveys were conducted in summer). Section 6.2 of the BAR states that,

...the Pine Donkey Orchid is presumed to occur on occasion while the presence of individuals of the species is unknown. While the works would be unlikely to impact on a population of Pine Donkey Orchid the BCC requires that further targeted surveys are necessary to determine if any offsets are

required for this species. Targeted surveys are recommended to occur within the next flowering season which will be between August and September 2016.

OEH advises that the Framework for Biodiversity Assessment (FBA) does not necessarily require targeted survey. Section 6.5.1.9 of the FBA states,

An assessor must establish whether any species that remains a candidate is present on a development site, or is likely to use the potential habitat on the development site, by either:

- (a) assuming it is present (development sites only), or*
- (b) undertaking a threatened species survey in accordance with Section 6.6, or*
- (c) obtaining an expert report in accordance with Subsection 6.6.2.*

It is up to the assessor to select the method of assessment.

It is noted that Table 3-1 of the EIS indicates that construction would commence in January 2017, enabling adequate time to conduct a targeted survey in spring for this species. If the Pine Donkey Orchid was found not to be present, then no further assessment is required. If the orchid was found to be present and all impacts on Pine Donkey Orchid habitat are avoided (eg through locating the power line underground along the centre of Pat Meredith Drive as discussed at the site visit) further assessment will not be required.

Recommendation

- 3.1 That further consideration of the Pine Donkey Orchid, following one of the options presented in section 6.5.1.9 of the FBA, is conducted unless impacts on Pine Donkey Orchid habitat can be avoided.

4 Aboriginal Cultural Heritage

It is understood that the Department of Planning and Environment has requested that the proponent provide the Binjang Wellington Wiradjuri Heritage Surveys and Wiradjuri Council of Elders feedback on the Aboriginal Cultural Heritage Assessment Report, but that this is not yet available.

OEH has reviewed the Aboriginal Cultural Heritage (ACH) assessment (Appendix G of the EIS) against the Secretary's Environmental Assessment Requirements for the project, including the Aboriginal consultation requirements of Section 80C of the *National Parks and Wildlife Regulation 2009*, and consider it has adequately addressed all requirements.

The project results show that the location for the proposed solar farm has an extensive land use disturbance history and does not contain landforms commonly associated with culturally sensitive areas. This is borne out from the results of the ACH field surveys, involving local Aboriginal participation, which observed only seven stone artefacts scattered in isolation to each other across the proposed easement and peripheral to it.

OEH accept the ACH assessment findings and interpretation of the scientific values for the Aboriginal objects as low. Consequently OEH support all of the ACH assessment report recommendations which include no further need for archaeological investigations, development of an appropriate heritage management plan, continued involvement of the RAPs for guiding appropriate mitigation for the Aboriginal objects and development of an expectant finds protocol.

Recommendation

- 4.1 That all of the recommendations presented in the ACH assessment report (Appendix G of the EIS) be implemented.



Department of Primary Industries

OUT16/17401

Ms Diana Charteris
Resource Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Diana.charteris@planning.nsw.gov.au

Dear Ms Charteris

Parkes Solar Farm Project (SSD 6784) Comment on the Environmental Impact Statement

I refer to your email dated 23 March 2016 to the Department of Primary Industries in respect to the above matter. Comment has been sought from DPI Water, Lands & Natural Resources and Agriculture. DPI Lands & Natural Resources advise no further issues. DPI Water and DPI Agriculture comments are as follows. Any further referrals to DPI can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

DPI recommends the following Conditions of Consent be included in any determination issued for the Parkes Solar Farm Project:

1. The proponent prepare a Soil and Water Management Plan in consultation with DPI Water prior to commencement of activities.
2. That rehabilitation objectives and strategies for returning the land to agricultural production (or alternate use) be defined prior to project implementation.

Comment by DPI Water

The Department of Primary Industries - Water (DPI Water) has reviewed the exhibited Environmental Impact Statement for the Parkes Solar Farm Project. The following comments are provided to assist in determination of the project.

- The EIS indicates water demands during the 9 month construction period are mainly for dust suppression with 109ML required. The water is to be trucked to site however the source and security of this supply is yet to be confirmed. The EIS refers to on-site water supply however there is no detail of the potential water sources, their reliability or consideration of licensing requirements. There is also reference to the potential to access water from local water supply authorities, however the ability to do so has not been confirmed. DPI Water recommends the ability to access the required water be confirmed prior to project approval. Potable water demands over the 9 month construction period is 30 000L, which is to be delivered in bottles.
- Water demands for the operation period are for the staff amenities and for cleaning the solar panels. It is recommended the volume be estimated and confirmation be made on the ability to access this water source, of the appropriate quality and volume when required.
- Two groundwater bores are located within the footprint of the proposed solar array infrastructure. Any proposed changes to the bore infrastructure (eg. decommissioning)

will require consultation with DPI Water to confirm requirements under the *Water Management Act 2000* and relevant standards to complete the works. The use of water from these bores would require the proponent to acquire sufficient entitlement in the relevant water source and may require additional approvals under the *Water Management Act 2000* if not considered within the current SSD project.

- Two dams are located within the footprint of the solar infrastructure and there is a minor drainage line connecting dams on the property. Modifications to these dams and consideration of alterations to drainage paths due to the proposed infrastructure (eg. roads, solar infrastructure, trenching) will need to be addressed in development of relevant management plans for the site. The proposed above ground transmission line is proposed within 40m of Ridgely Creek, however the extent of works is uncertain. It is recommended works within waterfront land be consistent with DPI Water's "Guidelines for Controlled Activities on Waterfront Land (DPI 2012)".
- DPI Water supports the proposed management of erosion and sedimentation impacts via development of a Soil and Water Management Plan in accordance with the guideline, "*Managing Urban Stormwater: Soils and Construction*". DPI Water requests consultation during development of this plan.

For further information please contact Tim Baker, Senior Water Regulation Officer, (02) 6841 7403, tim.baker@dpi.nsw.gov.au.

Comment by DPI Agriculture

Department of Primary Industries – Agriculture has reviewed the exhibited Environmental Impact Statement for the Parkes Solar Farm Project against the SEARs and the Primefact

"Infrastructure Proposals on Rural Land" available at

http://www.dpi.nsw.gov.au/_data/assets/pdf_file/0020/359030/infrastructure-proposals-on-rural-land.pdf

The following matters should be addressed:

- The risk to the solar panels from aerial spraying activities on adjacent farm land and associated management response,
- Decommissioning and rehabilitation of the project. It is noted that a Decommissioning Environmental Management Plan (page 131, Section 8.1 Environmental Management) is to be developed at the project stage. It is recommended that consent conditions should articulate the rehabilitation objectives and strategies for returning the land to agricultural production (or alternate use) prior to project implementation. It should be noted that some of this site (particularly the Parkes soil landscape area) is regarded as high value and is important cropping land for the Parkes area so the consideration of this in final land use should be included.

For further information please contact Mary Kovac, Resource Management Officer, (02) 6881 1250, mary.kovac@dpi.nsw.gov.au.

Yours sincerely



Mitchell Isaacs

Director, Planning Policy & Assessment Advice

29/4/2016

3 May 2016

SF2014/092247; WST14/00131/02

The Manager
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Ms Diana Charteris

Dear Ms Charteris

SSD6784: Lot 4 DP 854193; Pat Meredith Drive, Parkes; Parkes Solar Farm

Thank you for your email of 22 March 2016 referring the Environmental Impact Statement for the proposed Parkes Solar Farm to Roads and Maritime Services for comment.

Roads and Maritime notes the proponent is not, at this time, able to advise the types, volumes and origin/destination of traffic generated by the proposal. However, based on the information provided, an upgrade to the existing intersection of Pat Meredith Drive and Henry Parkes Way (MR61) will be necessary to provide a high level of road safety and traffic efficiency for construction and operational traffic as well as background traffic on these two roads.

Following consultation with the proponent, Roads and Maritime recommends that a Traffic Management Plan (TMP) be developed in consultation with Parkes Shire Council and Roads and Maritime to determine the level of intersection upgrade required at the intersection of Pat Meredith Drive and Henry Parkes Way. To ensure the intersection upgrade is completed at appropriate time, Roads and Maritime recommends the following conditions be included in any consent issued in relation to SSD6784 by the Department of Planning Environment:

- Prior to the commencement of construction works, the intersection of Pat Meredith Drive and Henry Parkes Way is to be upgraded. To confirm the level of intersection works, a Traffic Management Plan (TMP) is to be prepared in consultation with Parkes Shire Council and Roads and Maritime Services to outline measures to manage traffic related issues associated with the delivery and construction of the solar plant and ancillary structures, any construction or excavated materials, machinery and personnel involved in the construction, operation and decommissioning process. The plan is to detail the potential impacts associated with the development, the measures

Roads and Maritime Services

to be implemented and the procedures to monitor and ensure compliance. This plan is to address, but not necessarily be limited to:

- The origin, number, size, frequency and destination of vehicles accessing/exiting the site.
- Loads, weights and lengths of haulage and construction related vehicles and the number of movements of such vehicles.
- Existing background traffic, peak hour volumes and types and their interaction with projected development related traffic.
- The management and coordination of construction and staff vehicle movements to the site and measures to limit disruption to other motorists.
- Scheduling of haulage vehicle movements to minimise convoy length or platoons.
Consideration is to be given to minimise the route length for road transport of all over size and over mass loads.
- Details of intersection improvement works in accordance with *Austroads Guide to Road Design* and Roads and Maritime supplements.
- Local climate conditions that may affect road safety for vehicles used during construction, operation and decommissioning of the project (eg fog).

The preparation of the TMP for the project is to involve the appointed transport contractor, Parkes Shire Council and Roads and Maritime Services to determine the final details of haulage, including exact transport routes, road-specific mitigation measures and haulage timing. Road and intersection improvement works are to be approved and completed prior to the commencement of construction of the solar farm.

- The intersection upgrade is located on a state road and the developer will be required to undertake private financing and construction of works on a road in which Roads and Maritime Services has a statutory interest. A formal agreement in the form of a Works Authorisation Deed (WAD) is required between the developer and Roads and Maritime Services prior to works commencing.
- Prior to the commencement of construction work, the proponent is to contact Roads and Maritime's Traffic Operations Coordinator to determine if a Road Occupancy Licence (ROL) is required. In the event that an ROL is required, the proponent is to obtain the ROL prior to works commencing within three (3) metres of the travel lanes in Henry Parkes Way.

It would be appreciated if a copy of the determination for this project could be forwarded to Roads and Maritime at the same time it is sent to the proponent. Should you require further information please contact Andrew McIntyre, Manager Land Use Assessment, on 02 6861 1453.

Yours faithfully



Dane Hendry
Acting Network & Safety Manager
Western



Fire & Rescue NSW

File Ref. No: BFS16/574 (10149)
TRIM Doc. No: D16/27861
Contact: Mark Castelli

12 April 2016

The Department of Planning & Environment
C/- Diana Charteris
GPO Box 39
SYDNEY NSW 2001

E: diana.charteris@planning.nsw.gov.au

Dear Ms Charteris

Proposed Parkes Solar Farm Hilltop, Pat Meredith Drive, Parkes (SSD14_6784)

I refer to the above development proposal's Environmental Impact Statement (EIS) which is currently on public exhibition. Fire & Rescue NSW (FRNSW) have reviewed the EIS and the following comments and recommendations are submitted for consideration.

FRNSW notes that the facility's proposed location is approximately 10 kilometres from the Parkes Township and will be within the Parkes Local Government Area. In the event of a significant emergency incident involving the proposed development it is highly likely that both fire agencies (i.e. FRNSW and the NSW Rural Fire Service [RFS]) would respond to the site.

FRNSW would respond to the site to either assist the RFS or to fulfill our statutory duties in managing a hazardous material incident (as required by Section 6 (2) of the Fire Brigades Act 1989).

It is FRNSW experience that small and large scale photovoltaic installations present unique electrical hazard risks to personnel when fulfilling their emergency first responder role (N.b. the Fire Brigades Act 1989 imposes specific statutory functions and duties upon the Commissioner of FRNSW).

In addition, the Work Health and Safety (WHS) Act 2011 (and its subordinate Regulation) classify FRNSW as an entity (person) conducting a business or undertaking (PCBU). Clauses 34 and 35 of the WHS Regulation impose specific obligations upon a PCBU to identify hazards and manage risks at workplaces.



We note that Section 7.9 of the EIS primarily addresses hazards associated with bush/grass fires and repair and maintenance activities that will increase the likelihood of bush fire events. It appears that specific analysis of the fire hazard potential of all infrastructure associated with the facility has not been comprehensively considered (e.g. the potential for solar array fires, fires involving electrical components, sub-station fires and so on).

Due to the electrical hazards associated with large scale photovoltaic installations and the potential risk to the health and safety of firefighters, both FRNSW and the NSW Rural Fire Service must be able to implement effective and appropriate risk control measures when managing an emergency incident at the proposed site.

Recommendation/s

Should a fire or hazardous material incident occur, it is important that first responders have ready access to information which enables effective control measures to be rapidly implemented. Without limiting the scope of the emergency response plan (ERP), the following matters are recommended to be addressed:

1. That a comprehensive ERP is developed for the site.
2. That the ERP specifically addresses foreseeable on-site and off-site fire events and other emergency incidents, (e.g. fires involving solar panel arrays, bushfires in the immediate vicinity or potential hazmat incidents).
3. That the ERP detail the appropriate risk control measures that would need to be implemented in order to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards). Such measures would include the minimum level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures, minimum evacuation zone distances and a safe method of shutting down and isolating the photovoltaic system (either in its entirety or partially, as determined by risk assessment).
4. The ERP should also specify additional other risk control measures that may need to be implemented in an emergency due to unique hazards associated with the facility.
5. That two copies of the ERP (detailed in recommendation 1 above) be stored in a prominent 'Emergency Information Cabinet' which is located in a position directly adjacent to the site's main entry point/s.
6. Once constructed and prior to operation, that the operator of the facility make contact with the relevant local emergency management committee (LEMC). The LEMC is a committee established by virtue of Section 28 of the State Emergency and Rescue Management Act 1989. LEMCs are required to be established so that emergency services organisations and other government agencies can proactively develop comprehensive inter agency local

Unclassified

emergency procedures for significant hazardous sites within their particular local government area. The contact details of members of the LEMC can be obtained from the relevant local council.

For further information please contact Mark Castelli of the Fire Safety Assessment Unit, referencing FRNSW file number BFS16/574 (10149). Please ensure that all correspondence in relation to this matter is submitted electronically to bfs@fire.nsw.gov.au.

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'D Fleming', is written over the printed name.

Daire Fleming
Manager
Fire Safety Advisory Unit



SSD 6784

Contact Person: Michael Carter

28 April 2016

NSW Department of Planning and Environment
23 - 33 Bridge Street
SYDNEY NSW 2000

Attention: Diana Charteris

SUBMISSION - PARKES SOLAR FARM PROJECT (SSD 6784) PAT MEREDITH DRIVE, PARKES

Thank you for the opportunity to comment on the Parkes Solar Farm Project, involving the construction and operation of a 65 MW Solar Photovoltaic (PV) Plant and associated infrastructure.

Parkes Shire Council makes the following comments in relation to the proposed development:

Farmland Amenity

It is noted that a number of well established farms and associated dwellings are in close proximity to the development site. The assessment of the proposal must include a robust assessment of the amenity of existing residents in the area.

Bushland Buffers / Offsets

The provision of native vegetation to screen the development from nearby roads and farming properties should be included as a condition in any consent.

Bushfire Hazard Mitigation

The grassy understorey of the development site must be properly maintained so as not to present a bushfire hazard.

Weeds Management

The property must be managed so as to minimise weeds on the site.

Environmental Management Plan

The Project Environmental Management Plan must be robust and cover all aspects of ongoing property management, including construction management plan, operation environmental management plan and decommissioning environmental management plan.



Access and Traffic

All vehicular movements should be via the intersection of Henry Parkes Way and Pat Meredith Drive. The NSW Roads and Maritime Services should review the road intersection and advise any necessary upgrades. No new road accesses onto Henry Parkes Way should be permitted.

The road reserve of Pat Meredith Drive does not appear to extend all the way to the Henry Parkes Way, and the actual roadway traverses a Travelling Stock Route / Crown Land (Lot 7002 DP 94814). It is necessary to create a road reserve along that section of Pat Meredith Drive that traverses the Crown Land.

Pat Meredith Drive, linking the development site to Henry Parkes Way, is constructed to a gravel road standard. It is necessary to upgrade and bitumen seal the section of road from the proposed entrance of the solar farm to the intersection of Pat Meredith Drive and Henry Parkes Way, to accommodate all traffic generated from the development, including construction traffic. The road upgrading works should be undertaken prior to construction of the facility.

Upon finalisation of the construction phase of the development and commissioning of the solar farm, the condition of Pat Meredith Drive, linking the development site to Henry Parkes Way, should be audited and any repairs undertaken.

Primary Production Lands

The final proposal needs to consider how the development will maintain the viability of the land and its contribution to the agricultural production of the region. For example the facility may be able to incorporate design features that allow ongoing livestock grazing activities.

Community Contributions

It is noted that the capital cost of the project is almost approaching \$100m with a significant workforce during construction and commensurate impact on infrastructure and facilities. Accordingly, Parkes Shire Council believes there should be a monetary contribution paid under a Voluntary Planning Agreement (VPA). Council would be happy to work with the proponents to negotiate the VPA.

Yours faithfully,

Kent Boyd
GENERAL MANAGER

Jenny Walsh

From: Deb Bate <deb.bate@lls.nsw.gov.au>
Sent: Monday, 4 April 2016 12:55 PM
To: Jenny Walsh
Subject: Re: Request for input in the environmental assessment process for proposed Parkes Solar Farm

CWLLS asks that the following issues be considered in the EIS.

1. Passage through the Currajong Travelling Stock Reserve is currently used to access the property on which the solar farm will be located. This reserve is used for travelling stock periodically. It was used twice last year by a travelling mob of 800 head. It will be used in a fortnight by another mob of similar size.

When mobs reach the reserve, they generally stay a couple of days using the water supply before the walk into Parkes. As such cows amble across Pat Meredith Drive and around the existing sub-station. The gates to the farm are rarely used and remain closed when stock are present.

CWLLS perceives an issue for semi-supervised cattle during the construction phase when numbers of vehicles will be using Pat Meredith Drive. It will be impossible to keep gates closed and even a heavy duty ramp may not carry the weight of construction cranes etc. (Ramps are not always a deterrent to some livestock.) Cattle will enter and proceed down the lane towards the solar farm resulting in ongoing issues with vehicles and construction.

During operational phase, similar issues may occur.

CWLLS requests that Pat Meredith Drive be fenced as part of the proposal, extending from the existing property boundary (in the south) to the edge of the road corridor (in the north). It would suit CWLLS to locate this fence 10m. off Pat Meredith Drive to limit the loss of cattle feed, however it may be as efficient to fence the existing powerline easement.

CWLLS raises that a fence running directly to a busy road creates considerable risk at its end point (where cattle go around it). Hence CWLLS advises that a dogleg fence should be constructed with a wing extending west to the edge of Ridgy Creek. (Total length approx. 700 m.) That would provide safety with the drover locating camp and observation point at Ridgy Creek end of the fence, with knowledge that traffic and cattle over by the substation cannot collide.

2. CWLLS seeks to ensure that two potential impacts of the enlargement of the sub-station site does not affect our operations and environmental values.

i. The substation site appears to have room for expansion without further encroachment on the Reserve. If however the size of the sub-station is increased, CWLLS requests that this be onto the private property to the east of the existing location.

ii. Currently several powerline easements dissect the Reserve. CWLLS requests that no further mature trees are lost from the Reserve by the creation of additional easements. Duplication of powerlines along existing easements is preferred. Placing additional easements over the cleared farmland outside the Reserve is also preferred.

NGH should consider and assess the impact on species found within the Reserve as the construction and operation of a power plant and substation seems certain to impact mature trees.

3. Consideration that the apparent vacant bushland is in fact a working environment must be a focus during the construction phase. CWLLS requests that the Reserve (along Pat Meredith Drive) not be used to stockpile materials that may injure an animal or its drover. Such materials range from batteries to sharp edged objects. Cattle are inquisitive and without enough intelligence to save themselves.

4. CWLLS has a water supply dam in the middle of the Currajong Reserve. Water harvesting by the proponent will only impact our catchment if drainage along Pat Meredith Drive is altered. CWLLS requests that the existing catchment of the existing dam is not altered by road construction.

Flooding on Ridgy Creek provides most of the periodic food supply of this Reserve. CWLLS would not like to see that modified by upstream water harvesting.

5. CWLLS requests consideration of light and noise impacts on resting cattle at night. A holding yard is located west of Ridgy Creek for night mustering. Consideration is needed of impacts that may spook cattle. Whilst constant light should not be an issue, lights of shift workers car passing along Pat Meredith Drive may be. Similarly, constant noise is not usually an issue, but a crack like an arcing electrical current could be extremely problematic.

Deborah Bate | Manager, Land Services

Central West Local Land Services

46 Sherriff St | PO Box 897 | Forbes | NSW 2871

T: 02 6850 1602 | F: 02 6851 6991 | M: 0427 933 338 | E: deb.bate@lls.nsw.gov.au

W: <http://www.centralwest.lls.nsw.gov.au> | Like Central West LLS on facebook

On 1 April 2016 at 11:00, Jenny Walsh <jenny.w@nghenvironmental.com.au> wrote:

Hi Deb,

Sorry to hassle you about this one, I just wondered if you had a chance to respond to this one? Jane Blomfield from our Bega office said you had called and said LLS can provide a response this week. I just wanted to check whether the response would be emailed or posted.

Many thanks,

Jenny

From: Jenny Walsh

Sent: Monday, 21 March 2016 8:43 PM

To: deb.bate@lls.nsw.gov.au

Subject: RE: Request for input in the environmental assessment process for proposed Parkes Solar Farm

Hi Deb,

Have you had a chance to consider the attached request for LLS input into the proposed Parkes Solar Farm EIA?

One thing we did not mention in the letter sent in January is that Crown Lands advised that the proposal has the potential to impact a Travelling Stock Route located north and adjacent to the proposal area. Attached is

the correspondence from Crown Lands (within an overall response from DPI). Are you able to advise whether the proposal would impact on this TSR? And the location of the TSR?

Many thanks,

Jenny

From: Jane Blomfield

Sent: Tuesday, 19 January 2016 1:06 PM

To: deb.bate@lls.nsw.gov.au

Cc: Jenny Walsh <jenny.w@ngHENvironmental.com.au>

Subject: Request for input in the environmental assessment process for proposed Parkes Solar Farm

Hi Deb,

Please find attached a letter requesting LLS input into the environmental assessment process of the proposed solar farm at Parkes.

Should you have any feedback please respond to jane.b@ngHENvironmental.com.au. If you require further information, please contact me via email or phone (02) 64928315.

Kind regards

Jane