

30 June 2017

sent by email correspondence

Mr Iwan Davies
Senior Planner
Department of Planning & Environment
320 Pitt Street
Sydney, 2000

Dear Iwan

Limondale Solar Farm (SSD 8025)
Response to submissions in relation to Environment Impact Assessment

This Submissions Report responds to submissions made by community, industry and government agencies on the Environmental Impact Assessment (EIS) report submitted to the NSW Department of Planning and Environment (DPE) on 11 April 2017 for the development, construction and operation of a solar PV renewable energy generation facility known as the Limondale Sun Farm as proposed for development by Overland Sun Farming Pty Ltd (Overland).

Submission

DPE received 15 submissions on the submitted EIS for the Limondale project, including 11 from government agencies and 4 from the general public and industry. The EIS exhibition period commenced on Thursday 27 April 2017 and concluded on Friday the 26 May 2017.

Appendix 1 of this Submissions Report addresses each submission with reference to the relevant party and additional information and response from Overland.

Overland is pleased to provide this report to DPE and looks forward to progressing the application for consent to develop, construct and operate this significant solar energy generation facility in New South Wales.

Sincerely



Brett Thomas
CEO & Managing Director



1 RESPONSE TO GOVERNMENT AGENCY SUBMISSIONS

1.1 DEPARTMENT OF PRIMARY INDUSTRIES

<i>It is recommended that the Erosion and Sediment Control Plan includes mitigation of construction impacts to water quality</i>	Overland understands the requirements of this condition and will comply with it through the inclusion of water quality management within an Erosion and Sediment Control Plan to be implemented prior to and during construction.
<i>The proponent should confirm the maximum annual water demands for construction and operation. Additionally, the proponent should specify the Water Access Licenses (WAL) proposed to be used.</i>	Estimated annual water consumption for the construction period of the solar farm (12 months) is 50ML, operational water use is estimated to be minimal for panel cleaning purposes twice per year and this water will be delivered by truck to site. The project landholder has access to a large volume of water far exceeding the estimated 50ML under WAL 8745. Overland and the landholder will establish and arrangement to utilize water under this WAL as required to the project.
<i>The proponent should provide details on any requirement for additional water reticulation or storage infrastructure at the site or at the offtake point from the river</i>	Water storage on site will be limited to appropriately sized water tanks for firefighting purposes. The size and location of the tanks will be defined in the Construction & Environment Management Plan and the Emergency Response Plan which will be prepared in consultation with the Rural Fire Service.
<i>Crown roads are adjacent to and within parts of the overall subject area and other impacted land is Crown land within Travelling Stock Reserves (i.e. Lots 7306 and 7307 DP 1158277). These parcels are also currently under Aboriginal Land Claim and will require consultation with the NSW Aboriginal Land Council (media@alc.org.au).</i>	Overland will consult with the NSW Aboriginal Land Council in relation to all land under Aboriginal Land Claim.
<i>Crown roads impacted by the project should be purchased and closed by the adjoining land owner, or transferred to the local council if their use is still required</i>	Two Crown roads have been identified within the site boundary, which would be closed should the project be constructed. The southern Crown road is entirely within the development footprint and is not accessible by adjoining landowners. The northern Crown road is not accessible from the adjoining property to the west; however would be accessible from the adjoining eastern property (ie the travelling stock reserve (TSR)) administered by Dol



	Lands. Further consultation with DoI Lands will be undertaken following approval to determine the process for closing the section of this Crown road within the TSR. The closure of these Crown roads would not have an impact on adjoining landholders within the immediate vicinity of the site.
<i>The proponent should prepare a 'Decommissioning Management Plan' developed at the initial project development stage. The 'Decommissioning Management Plan' should incorporate:</i> <i>Baseline data for the site including soil and land resources, current land use and capability, to inform future land rehabilitation for a return to similar rangeland landform and agriculture use.</i> <i>Rehabilitation objectives and strategies for returning the land to rangeland agricultural production.</i> <i>Removal of all subsurface infrastructure or alternatively all subsurface infrastructure is placed a minimum of 1200 mm below ground level to ensure that no future agricultural activities are impacted by this infrastructure. Detailed location identification of any remaining subsurface infrastructure is required</i>	A Decommissioning Management Plan will be prepared prior to the commencement of construction incorporating; - Baseline data of soil and land resources, current land use and capability. - Rehabilitation objectives and strategies. - Removal of all above ground infrastructure. Underground or buried infrastructure will be left in-situ in accordance with agreements between Overland and the project landowner to avoid unnecessary ground disturbance.
<i>The proponent should prepare a 'Groundcover Management Plan' including consideration of species that will be utilised by grazing animals, spacings that will encourage pasture growth, water supply options for stock, and alternatives for protecting the soil if pasture establishment is not successful – in particular hard surface runoff management prior to commencement of works.</i>	Overland understands the requirements of this condition and will comply with it prior to the commencement of construction.
<i>The proponent should prepare a 'Construction Environmental</i>	Overland understands the requirements of this condition and will comply with it prior to the commencement of



<i>Management Plan' (CEMP) to establish erosion and sedimentation controls at the commencement of works, throughout construction and during trenching for the underground cabling. All construction works should be managed in accordance with the Managing Urban Stormwater: Soils and Construction (2004) series.</i>	construction. Relevant aspects of the Managing Urban Stormwater Soils & Construction Series (2004) document will be included in the CEMP and construction works will be managed in accordance with the CEMP.
<i>The proponent should prepare a 'Weed Management Plan' incorporating vehicle hygiene regimes.</i>	Overland understands the requirements of this condition and will comply with it prior to the commencement of construction.

1.2 DIVISION OF RESOURCES AND GEOSCIENCE

DRG is satisfied that the cumulative impacts on heavy mineral sands exploration raised in the SEARs have been adequately addressed.	Overland acknowledges and thanks the Division of Resources and Geoscience for their response and will continue to liaise with Iluka Resources
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1.3 ENVIRONMENT AND PROTECTION AGENCY

Based upon the information provided the proposed activity is not a scheduled activity under the act and the proposed solar farm does not require an Environmental Protection License. On this basis, the EPA has no further comments to make in relation to this proposal	Overland acknowledges and thanks the Environment and Protection Agency for their response.
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1.4 FIRE AND RESCUE NSW

1. That a comprehensive Emergency Response Plan (ERP) is developed for the site	Overland understands the requirements of this condition and will comply with it prior to the commencement of construction.
2. That the ERP specifically addresses foreseeable on-site and off-site fire events and other emergency incidents, (e.g. fires involving solar panel	Overland understands the requirements of this condition and will comply with it prior to the commencement of construction through the incorporation of the requested matters in the EPR.



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 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)	Overland understands the requirements of this condition and will comply with it prior to the commencement of construction.
4. Other risk control measures that may need to be implemented in a fire emergency due to any unique hazards specific to the site should also be included in the ERP.	Overland understands the requirements of this condition and will comply with it prior to the commencement of construction.
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	Overland understands the requirements of this condition and will comply with it on commencement of construction and during the construction and operational phases of the project..
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 emergency procedures for significant hazardous sites within their particular local government area. The contact details of the members of the LEMC can be obtained from the relevant local council	Overland understands the requirements of this condition and will comply with it prior to the commencement of operations.



1.5 FORESTRY CORPORATION

1. Prior to clearing activities on crown timbered land, FCNSW and the proponent shall arrange the necessary authorities in order to take such timber; and	OVERLAND contacted Forestry Corporation NSW during the preparation of the EIS for the Limondale Sun Farm. As part of this consultation, information about the location of the timber reserves within the TSR was requested. The proposed connecting infrastructure to the Balranald Substation will be within the existing transmission line easement maintained by TransGrid. As noted within the EIS, the access road and transmission line corridor for the project traverse the TSR, which lies adjacent to the site's eastern boundary (see figure attached). This land is legally described as DP 1158277 Lot 7306 and DP 1158277 Lot 7307. These land parcels are outside of the site boundary, but inside the development footprint and infrastructure area for the project. Within these land parcels, the project will result in the disturbance of a total area of approximately 1.89 ha and 0.93 ha, respectively. These areas do not comprise any crown timbered land. In addition, access to the site will be via an existing cleared track through the TSR. A new intersection 250 m south of the intersection with Balranald Road and Yanga Way will be constructed and a short section of new access road to connect to the existing access track will be required. The route for this access track will avoid vegetation (refer to Figure 6.9 of the EIS), including any Crown timbered land.
2. Timber rights are held by FCNSW for lands administered under the Western Lands Act 1901 and the Crown Land Management Act 2016. FCNSW must be consulted prior to the establishment of offset arrangements on such lands.	As noted above, OVERLAND contacted Forestry Corporation NSW as part of the preparation of the EIS for the Limondale Sun Farm. As part of this consultation, information about the location of the timber reserves within the TSR was requested. Further consultation is required with Forestry Corporation NSW to determine the boundaries for crown timbered land within the immediate vicinity of the site boundary. As noted above, limited disturbance is proposed within the existing transmission line easement maintained by TransGrid and the TSR as part of the construction of the project.

1.6 NATURE CONSERVATION COUNCIL

Letter of Support	Overland acknowledges and thanks the Nature Conservation Council for their response.
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1.7 OFFICE OF ENVIRONMENT AND HERITAGE

Assessment of significance and statement of significance (Cultural/Social) be updated with inputs from the RAPs	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
RAP inputs into site avoidance, mitigation, salvage or impacts be included in the final documents.	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
Any RAP comments and inputs into recommendations be acknowledged, and where site appropriate, included in the ACHA and other relevant final documents	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
Final ACH documents to be updated with AHIMS site ID numbers once site registration in AHIMS has occurred	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
A Cultural Heritage Management Plan to be prepared that will address the requirements for the five sites that will be harmed, the eight sites that are to be avoided and any additional sites identified during the construction and operation, including human remains	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
To minimise impacts on breeding individuals we recommend a seasonal constraint on vegetation clearing to mitigate direct impact to threatened fauna during the breeding season. Clearing should be at a time likely to minimise impacts on hollow-dependent fauna. If clearing is to occur during the spring or early summer we recommend additional pre-clearance survey of all hollow-bearing trees.	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
If the detailed design of the access from Yanga Way results in additional vegetation being cleared, the area of vegetation impacted must be	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report



assessed in accordance with the Framework for Biodiversity Assessment	
Construction activities and storage of materials for boundary fencing should be wholly contained within the proposal site. Disturbance to road reserves other than access points identified in the EIS must not occur	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
1. The proponent provide scanned copies of plot and transect field data sheets to OEH via email at planning.matters@environment.nsw.gov.au	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
2. If floristic data are not intended to be entered directly into the VIS Flora Survey module of the Atlas of NSW Wildlife, copies of plot and transect field data are to be provided in MS Excel spreadsheet format to OEH via email at planning.matters@environment.nsw.gov.au .	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
The Biosis (2016) report titled 'Balranald Sun Farm site: Ecological constraints assessment' has not been provided to OEH. Any assumed knowledge from that report is not available for our review.	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
Based on consideration of the above, we recommend the following condition of development consent: Construction activities and storage of materials for boundary fencing should be wholly contained within the proposal site. Disturbance to road reserves other than access points identified in the EIS must not occur.	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
3.4 Assessment of landscape value The final landscape score should be stated in the BAR. The BAR provides components of the landscape value assessment and the final landscape score is able to be identified in the BioBanking Credit Calculator (BBCC), however the BBCC is not readily accessible. Please refer to Table 20 in	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report



Appendix 7 of the FBA for reporting requirements.	
1 We understand that the precise location of the site access track from Yanga Way will be determined during the detailed design phase. Based on aerial imagery, we agree that vegetation condition of the current route of the proposed road from Yang a Way is likely to be similar to that in the electricity connection corridor. If the proposed route is changed any vegetation clearing associated with the new site access track needs to be specified, including vegetation clearing or lopping for widening the existing vehicle track. Additional assessment for impacts to threatened species and communities will be required if the new footprint includes: a) a larger area than currently estimated in the BAR; b) areas with a different species composition to the electricity connection corridor; or c) patches of intact native vegetation. If native vegetation cannot be avoided, any offset requirements must be calculated and an updated version of the BOS submitted to OEH.	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
2 It is unclear if the vegetation clearing and soil disturbance for construction of the perimeter security fence has been included in the impact assessment. We have recommended a condition of approval to cover potential impacts under the heading 'Section 1 Introduction' above.	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
Prior to clearing for construction: native vegetation, which is additional or different to that included in the Biodiversity Assessment Report dated 10 April 2017, and will be cleared or lopped for the construction or widening of the site access track from Yanga Way, must be assessed for biodiversity impacts and documented accordance with the Framework for Biodiversity Assessment, unless otherwise agreed by OEH. The assessment must be undertaken by a person accredited in accordance with s142B(1)(c) of the Threatened Species Conservation Act 1995.	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report



5.1 Methods Targeted surveys for the proposed access road from Yanga Way will be required prior to clearing for construction. 5. 2 Fauna habitat assessment results OEH considers scattered trees in agricultural landscapes to be important for biodiversity. It appears that the more isolated of the 18 individual scattered trees on the proposal site were not visited during the fauna field survey. The potential impact of tree removal on ecosystem credit threatened species has been included in the assessment so offsetting requirements have been met without needing to visit each tree. OEH agrees with the assumption on page 27 of the BAR that scattered trees on the proposal site are mature and hollow-bearing. It is possible that hollow-dependent fauna, including threatened birds and microbats, will be occupying the hollows. We recommend a seasonal constraint on vegetation clearing to mitigate direct impacts to threatened fauna during the breeding season. Clearing should at a time likely to minimise impacts on hollow-dependent fauna. Clearing between late summer and late autumn is less likely to impact on bats and between late summer and late winter will have minimal impact on hollow-dependent birds. If clearing is planned for spring and early summer, we consider that a pre-clearance survey of hollows by a qualified ecologist is required, with a fauna rescue protocol to be implemented when clearing occurs.	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
Develop a construction protocol for identification and management of rescued fauna that includes pre-construction liaison with animal welfare	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report



organisations to enable support if required. The protocol will be developed in consultation with OEH and be finalised before commencement of clearing.	
If vegetation clearing is to be undertaken in spring and early summer: conduct a pre-clearance survey of all hollow-bearing trees. The survey will be undertaken by a qualified ecologist prior to clearing for construction. The survey will identify hollows where threatened fauna are nesting or roosting and ensure safe removal and relocation of threatened species from areas to be cleared. Animals will be rescued according to the fauna rescue protocol.	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
6. 1. 2 Recommendations to avoid, minimise and mitigate impacts This section would be clearer if presented as a table of measures to be implemented before, during and after construction to avoid and minimise impacts of the project, including action, outcome, timing and responsibility. Please refer to guidance in the FBA for minimum information requirements in the BAR (Appendix 7, page 102). We support most of the mitigation measures recommended for inclusion in the Construction Environmental Management Plan (CEMP), also referred to as the 'EMP' in the EIS. We also recommend including measures for minimising the impact of introduced species into remnant vegetation on the proposal site and the adjoining Travelling Stock Reserve (TSR). The adjacent TSR supports large patches of mature and intact native vegetation so is likely to have high biodiversity values.	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
The impact assessment identifies indirect impacts including invasive exotic species and soil erosion and/or compaction. Section 6.5.3 of the EIS (page 93) includes management and mitigation measures for impacts	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report



to land, which are generally appropriate for minimising biodiversity impacts. These measures should be also be linked or included with mitigation of impacts to biodiversity to ensure that monitoring of weed control success, particularly for Boxthorn (<i>Lycium ferocissimum</i>), includes consideration of improvement in vegetation condition. Introduction of pasture species and weed seeds from hay bales during ground stabilisation works into native remnant vegetation has the potential to reduce condition of remnant vegetation on the site and native vegetation in the adjoining TSR. Section 6.5.4 of the EIS (page 95) discusses the potential use of ground cover plantings underneath the solar panels. Plantings of exotic species that have not been used in the traditional agricultural enterprise may have the potential to invade remnant native vegetation. We recommend that Section 6 of the BAR be amended as follows:	
List measures to avoid and minimise impacts of the proposal, including clear actions, timing and responsibility, in the format described in Appendix 7 of the FBA (Table 21, page 102). In the table, include or clearly link those mitigation measures from Section 6.5 of the EIS that relate to pest plant and animal impacts.	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
All scattered hollow-bearing trees to be removed should be placed in areas of retained vegetation to provide additional fauna habitat. Sterile exotic crops or native ground cover species be considered if plantings are required beneath the solar panels to minimise the impact of weed incursion into remnant native vegetation. Weed control programs include the following:	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report



Success measures for pest plant control programs include an improvement in vegetation condition. Weed management protocols include vehicle hygiene measures to ensure machinery undertaking construction works on the proposal site and adjoining TSR are clean of weed seeds and propagules prior to leaving the depot or previous location. o Pasture species, weed seeds from hay bales and non-local native plants will not be introduced into native remnant vegetation. Alternative measures for ground stabilisation works, if required, should be implemented adjacent remnant native vegetation. o Any supplementary planting on the site within 50 metres of native vegetation will not disturb the existing ecosystem and be with local species.	
Section 9 Biodiversity Offset Strategy The proposed offset strategy is appropriate. Revisions and updates to the strategy must be agreed with OEH. The conditions relating to the retirement of credits associated with this project must be consistent with the NSW biodiversity offsets policy for major projects.	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report
Species for Further Consideration It appears that the proponent has not received the full details of our advice to DP&E regarding the SEARs for Limondale Sun Farm, emailed to DP&E on December 3 2016 (Attachment B). We understand that DP&E would prefer to give proponents of solar proposals a streamlined version of the environmental requirements typically issued for major projects. While part of our response to a SEARs request is standardised, the information we provide in the cover letter gives specific guidance about the proposal site. This advice helps biodiversity and ACH consultants to	Refer to Appendix A, B & C for letter from Biosis addressing OEH points, updated Aboriginal Cultural Heritage Assessment Report & Archeological Report



understand OEH requirements. It is also intended to minimise the number of inadequate EIS's being submitted and speed up our assessment.

We also specify species and communities that require further consideration by DP&E if impacted by the proposal. Occasionally habitat requirements of species that otherwise would not meet the criteria are identified as not being able to withstand further loss in the catchment, such as raptor nest trees. In this case, the full list of impacts that require further consideration was not included in the SEARs issued by DP&E and Major Mitchell's Cockatoo (*Lophochroa leadbeaten*) was added. Major Mitchell's Cockatoo was recorded on the proposal site and its habitat will be impacted during construction. It is unclear if DP&E are now required to further consider these impacts before development consent is issued.

1.8 ROADS AND MARITIME SERVICES

1. A Traffic Management Plan shall be prepared in consultation with the relevant road authorities (Council and Roads and Maritime Services) to outline measures to manage traffic related issues associated with the development, particularly during the construction and decommission processes. The appointed transport contractor shall be involved in the preparation of this plan. The plan shall address all light and heavy traffic generation to the development site and detail the potential impacts associated with the development, the mitigation measures to be implemented, and the procedures to monitor and ensure compliance. This plan shall address, but not necessarily be limited to the following;

I) Require that all vehicular access to the site be via the approved access

Overland understands the requirements of this condition and will comply with it prior to the commencement of construction.



route. ii) Details of traffic routes to be used by heavy and light vehicles, and any associated impacts and any road-specific mitigation measures. iii) Details of measures to be employed to ensure safety of road users and minimise potential conflict with project generated traffic iv) Proposed hours for construction activities, as night time construction presents additional traffic related issues to be considered. v) The management and coordination of the movement of vehicles for construction and worker related access to the site and to limit disruption to other motorists, emergency vehicles, school bus timetables and school zone operating times, vi) loads, weights and lengths of haulage and construction related vehicles and the number of movements of such vehicles, vii) procedures for informing the public where any road access will be restricted as a result of the project, viii) any proposed precautionary measures such as signage to warn road users such as motorists about the construction activities for the project, ix) a Driver Code of Conduct to address such items as; appropriate driver behavior including adherence to all traffic regulations and speed limits, safe overtaking and maintaining appropriate distances between vehicles, etc. and appropriate penalties for infringements of the Code, x) details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck movements to	
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and from the site	
2. The Proponent must engage an appropriately qualified person to prepare a Road Dilapidation Report for all road routes to be used during the construction (and decommissioning) activities, in consultation with the relevant road authority (Roads and Maritime Services and Council). This report is to address all road related infrastructure. Reports must be prepared prior commencement of, and after completion of, construction (and decommissioning). Any damage resulting from the construction (or decommissioning) traffic, except that resulting from normal wear and tear, must be repaired at the Proponent's cost. The applicant is accountable for this process, rather than the proposed haulage contractor. Such work shall be undertaken at a time as agreed upon between the Proponent and relevant road authorities.	Overland understands the requirements of this condition and will comply with it both prior to the commencement of construction, after completion of construction and following decommissioning.
3. Prior to the commencement of construction on-site, the Proponent must undertake all works to upgrade any road, its associated road reserve and any public infrastructure in that road reserve, to a standard suitable for use by heavy vehicles to meet any reasonable requirements that may be specified by the relevant roads authority. The design and specifications, and construction, of these works must be completed and certified by an appropriately qualified person to be to a standard to accommodate the traffic generating requirements of the project. On Classified Roads the geometric road design and pavement design must be to the satisfaction of the Roads and Maritime Services.	Overland understands the requirements of this condition and will comply with it prior to the commencement of construction.
4. As a minimum the intersection of the access road with Yanga Way is to be constructed and the roadside maintained so as to provide the required Safe Intersection Sight Distance (SISD) with a reaction time of 2.5 seconds in either direction in accordance with the Austroads	Overland understands the requirements of this condition and will comply with it through design in accordance with Austroads publications, certification, construction and maintenance.



Publications as amended by the supplements adopted by Roads and Maritime Services for the posted speed limit. Compliance with this requirement is to be certified by an appropriately qualified person prior to construction of the vehicular access.	
5. As a minimum the intersection of the access road with Yanga Way is to be constructed with a Basic Right Turn (BAR) and Basic Left Turn (BAL) intersection treatment in accordance with the Austroads Guide to Road Design as amended by the supplements adopted by Roads and Maritime Services for the posted speed limit on Yanga Way. The intersection is to be constructed to the standards required for an approved road train route.	Overland understands the requirements of this condition and will comply with it through design to Austroads requirements and construction to standards.
6. As a minimum the access road is to be constructed to provide for 2 way movement and be sealed for at least 50 metres from its intersection with Yanga Way. The intersection shall be designed and constructed so that vehicles turning between Yanga Way and the access road are not required to cross to the opposing travel lane in order to perform a turn maneuver. The intersection shall be line marked in accordance with Australian standards.	Overland understands the requirements of this condition and will comply with it during the design and construction phases of work.
7. A management plan to provide measures to suppress dust generation from the development site and the transportation route shall be prepared and implemented to the satisfaction of Council and Roads and Maritime Services.	Overland understands the requirements of this condition and will comply with it prior to the commencement of construction.
8. No external lighting of any infrastructure associated with the project is permitted at night that may cause distraction to road users other than low intensity security lighting.	Overland understands the requirements of this condition and will comply with it.



9. Glint and glare from the solar panels shall not cause a nuisance, disturbance or hazard to the travelling public on the public road network. In the event of glint or glare from the solar plant being evident from a public road, the proponent shall immediately implement glare mitigation measures such as construction of a barrier (e.g. fence) or other approved device to remove any nuisance, distraction and/or hazard caused as a result of glare from the solar panels.	Overland understands the requirements of this condition and will comply with it.
10. The intersection of the access roadway and Yanga Way is to be designed and constructed so as not to interfere with the capacity of the current roadside drainage network and to prevent water from proceeding onto, or ponding within, the carriageway of Yanga Way. If a culvert is to be installed and is to be located within the required clear zone of Yanga Way for the posted speed zone it is to be constructed with a traversable type headwall.	Overland understands the requirements of this condition and will comply with it during the detailed design and project construction works.
11. Once the new access roadway is constructed all existing accesses to the developments site shall be removed and any damage or disturbance to the road reserve of Yanga Way shall be restored to match surrounding landform in accordance with Council requirements.	Overland understands the requirements of this condition and will comply with it during construction and operation of the project.
12. Yanga Way is part of the State Road network. For works on the State Road network the developer is required to enter into a Works Authorisation Deed (WAD) with Roads and Maritime Services before finalising the design or undertaking any construction work within or connecting to the road reserve. The Works Authorisation Deed documentation is to be submitted for each specific change to the state road network for assessment and approval by Roads and Maritime Services prior to commencement of any works within the road reserve. The applicant is to contact the Land Use Manager for the South West	Overland understands the requirements of this condition and will comply with it.



Region on Ph. 02 69236611 for further detail	
13. Any works within the road reserve of Yanga Way requires approval under Section 138 of the Roads Act, 1993 from the road authority (Council) and concurrence from Roads and Maritime Services prior to commencement of any such works. The developer is responsible for all public utility adjustment/relocation works, necessitated by the development and as required by the various public utility authorities and/or their agents.	Overland understands the requirements of this condition and will seek approvals prior to works and comply with the requirement for adjustment / relocation works.
14. All works associated with the project shall be at no cost to the Roads and Maritime Services.	Overland understands the requirements of this condition and confirms that Roads and Maritime Services will not be responsible for project works.

1.9 RURAL FIRE SERVICE

The Service has reviewed the plans and documents received for the proposal and subsequently raise no concerns or issues in relation to bush fire.	Overland acknowledges and thanks the Rural Fire Service for their response
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1.10 BALRANALD COUNCIL

Accommodation during construction. The project will place increased demands on accommodation during construction as identified in the EIS. This impact could be further built upon depending on the timing of the minerals and mines and the Sunraysia Solar farm construction. The EIS does not adequately address cumulative impacts.	The EIS addresses accommodation during construction in section 6.12.2 by sourcing workers from both the local and wider regions, comprising of people residing locally and those that would travel from the neighboring major Local Government Areas. Please see table 6.25 in the EIS for the breakdown of workers sourced from both the local and wider regions.
Community Contributions' The EIS is silent on this matter, however there	Overland has had preliminary discussions with a number of community based groups in the Balranald region, and



will be increased demand on community services and infrastructure such as RFS for fire protection.	will continue to discuss the most appropriate community contributions option with the relevant stakeholders.
Decommissioning Again the EIS is silent on this issue, yet the local community could be left with a footprint of up to 1000 hectares of infrastructure at the end of productive life. Council urges the Department to consider bonding or imposition of a strong condition that requires the landowner to undertake decommissioning. so the community is not left with a ugly legacy.	The EIS section (3.7) Management and Mitigation & Section 6.5.4 (iii) references a decommissioning plan to be prepared prior to the commencement of construction. The decommissioning plan will feature site rehabilitation objectives and strategies to return the site to agricultural productivity and will be implemented in accordance with agreements with the project landowner.

1.11 TRANSGRID

Letter of Support	Overland acknowledges and thanks Transgrid for their response and ongoing support of the project
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2 RESPONSE TO PUBLIC SUBMISSIONS

2.1 MOANENG

The shading impacts of the photovoltaic panels on vegetation	The paddock's current use is broad acre cropping, the panels will not cause shading on existing vegetation. There is no native ground vegetation in the cropped areas, all native vegetation to be removed was mapped and assessed in accordance with FBA
Adequacy of Aboriginal Heritage Surveys, register searches and consultation with Aboriginal stakeholders:	The Aboriginal Heritage Surveys comply with all relevant legislation.
1. Whether cultural significance of the objects was considered, and not only scientific significance of the objects (p 81)	Both cultural and scientific significance of objects were considered.



2. The only Aboriginal person who appears to have attended the survey did not provide specific details or identify any particular locations (p 78)	The Aboriginal heritage surveys comply with all relevant legislation.
3. The locations of the two registered indigenous places listed on the Aboriginal Heritage Database were not identified and it is unclear whether the relevant consultant sought to confirm that these places were not within the Project site (p 85)	The Aboriginal heritage surveys comply with all relevant legislation.
4. The EIS notes that the assessments were of limited overall effectiveness due to visibility issues (p 80), and 11 new Aboriginal objects were located even in those conditions	The survey coverage is considered acceptable under both the code of practice and archaeological best practice in NSW.
5. There is an active Native Title Claim registered over the subject Crown Land (claim reference NC2014/002) (p58)	There is an active native title claim however there is no native title determination. Overland is consulting with all relevant authorities
6. There was a high degree of prediction that scarred trees would be located (p 79), but none appeared to have been found, and it is not clear whether for example, OEH's Scarred Trees Field Manual had been consulted	The ecological surveys comply with all relevant legislation.
Adequacy of the mitigation measures for Aboriginal heritage items given that all of the Aboriginal objects within the development footprint which are proposed to be impacted are of moderate scientific significance (p 81), and whether the relevant consultant considered the possibility of, for example, fencing, or providing a buffer for, those objects and rearranging the solar farm panels to accommodate the Aboriginal objects	The Aboriginal heritage surveys comply with all relevant legislation.
Adequacy of the consideration of indirect impacts to native vegetation, threatened species and Aboriginal objects, for example, the impact of the removal of hollow bearing trees which may occasionally be utilised for foraging and nesting by the Major Mitchell's Cockatoo, a listed	An assessment against the FBA for Major Mitchell's Cockatoo has been provided to OEH in response to their EIS submission.



threatened species even though they are not "key" habitat (p 69)	
Adequacy of mitigation measures for native vegetation including for example, the possibility of fencing around the 18 hollow bearing trees proposed to be removed (p 69)	The biodiversity assessment was undertaken in accordance with the FBA. Refer to OEH guidelines for assessment of biodiversity values, refer to OEH's EIS submission. Overall, retention of scattered paddock trees within the solar array is considered of limited biodiversity value and mitigation measures will be implemented to reduce any impacts on resident fauna during tree removal.
Adequacy of noise mitigation measures, particularly during peak construction periods	The noise mitigation measures comply with all relevant standards and take into account cumulative impacts.
Adequacy of mitigation measures for cumulative impacts identified at p 135 – 139, for example, whether the cumulative impacts for biodiversity have been adequately addressed through mitigation measures	The ecological surveys comply with all relevant legislation.
Any consideration of waste issues.	Waste management will be addressed within the Construction & Environmental Management Plan.

2.2 ANTHONY GARDNER

Objects on grounds of electrical stability to national grid	The Limondale Sun Farm will assist the electricity sector in transitioning from a predominately fossil fuel powered grid system to renewable energy based sources which is consistent with the goals of the Commonwealth Renewable Energy Target and the NSW Renewable Energy Action Plan. Connection of the sun farm to the TransGrid grid infrastructure network will be in accordance with TransGrid connection standards and specification, the National Electricity Regulations and the requirements of the Australian Energy Market Operator.
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2.3 MICHAEL CRAWFORD

Objects on grounds of electrical stability to national grid	The Limondale Sun Farm will assist the electricity sector in transitioning from a predominately fossil fuel powered grid system to renewable energy based sources which is consistent with the goals of the Commonwealth Renewable Energy Target and the NSW Renewable Energy Action Plan. Connection of the sun farm to the TransGrid grid
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	infrastructure network will be in accordance with TransGrid connection standards and specification, the National Electricity Regulations and the requirements of the Australian Energy Market Operator.
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2.4 NAME WITHHELD

Letter of Support	Overland acknowledges this response
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