Edify Energy **Darlington Point Solar Farm** Response to Submissions Report

Final | 24 August 2018

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 254766

Arup Pty Ltd ABN 18 000 966 165

Arup Level 4, 108 Wickham Street Fortitude Valley QLD 4006 GPO Box 685 Brisbane QLD 4001 Australia www.arup.com

Contents

			Page
Certi	ification		1
1	Intro	luction	2
	1.1	Background	2
	1.2	Purpose of this report	3
	1.3	Proposal summary	4
	1.4	Exhibition period and location	8
	1.5	Project benefits	9
	1.6	Proposal need and justification	11
	1.7	Project approval under the EPBC Act	12
2	Consi	deration of submissions	13
	2.1	Responses received	13
	2.2	Proponent's response to community submissions	13
	2.3	Proponent's response to government agency submissions	14
3	Revise	ed mitigation measures	46
4	Envir	onmental licences and approvals	68
5	Concl	usions and recommendations	69
6	List o	f references	71

Certification

For submission of a response to submissions (RTS) report under Part 5, Division 5.2, Section 5.17, Item (6)(a) of the NSW *Environmental Planning and Assessment Act 1979*.

EIS prepared by		
Amy Flinn	Kellie Charlesworth	
Bachelor of Arts (Geographical Sciences)	Bachelor of Applied Science in Environmental Science, Honours Class I	
Master of Urban and Regional	Master of Engineering Science in Environmental Engineering	
Planning	MBA Postgraduate Certificate – Energy Futures and Transitions	
Arup Pty Limited		
Level 10 201 Kent Street		
PO Box 76 Millers Point		
Sydney, NSW 2000		
Applicant		
Edify Energy Pty Ltd Level 1, 34-35 South Steyne Manly, NSW 2095		
Proposed development		
Darlington Point Solar Farm Refer to Chapter 1 of this RTS report a development.	nd Chapter 2 of the EIS for a description of the proposed	
Land to be developed		
The proposed DPSF site is located to the town of Darlington Point. The DPSF pre- existing TransGrid Darlington Point Su TransGrid's connection policy to facility part of the development. The land to be	he east of Donald Ross Drive, approximately 10km south of the roject area comprises the proposed DPSF development site the abstation which is included within the DA in accordance with tate any substation augmentation works that may be necessary as a developed therefore includes:	
• Parts of Lot 160 of DP 821551 (ret	ferred to as 'Anderson property').	
 Parts of Lots 41, 42 and 64 of DP 7 750903 (referred to as 'Tubbo Stat 	750903, Lot 2 of DP 542215 and Lots 18, 35 and 36 of DP ion').	
• Lot 2 of DP 628785 (being the Tra	nsGrid substation site to which DPSF will connect).	
Certification		
We certify that we have prepared this RTS report with input from Edify Energy and our subconsultants EPS and KNC, to satisfy the requirements under Part 5, Division 5.2, Section 5.17, Item (6)(a) of the <i>Environmental Planning and Assessment Act 1979</i> and Section 85A of the <i>Environmental Planning and Assessment Regulation 2000</i> . To the best of our knowledge, it contains the responses to agency submissions received for the proposal. The information contained in this RTS report is neither false nor misleading.		
althin	Kelli Charles weath	
Amy Flinn	Kellie Charlesworth	

9 August 2018

9 August 2018

1 Introduction

1.1 Background

Edify Energy Pty Ltd (Edify Energy) is proposing to develop, construct and operate a large-scale solar farm approximately 10km south of Darlington Point within the Murrumbidgee Local Government Area (LGA) in western New South Wales (NSW), and approximately 15km north-east of Coleambally. The Darlington Point Solar Farm (DSPF) site is proposed to accommodate 275 megawatts (MW) alternating current (AC) of solar generated electricity, including the provision of a nominal 100MWh battery technology for energy storage and resupply during peak demand. The DPSF would connect to the adjacent TransGrid Darlington Point 330kV substation (the Darlington Point substation) and supply power to the National Electricity Market (NEM).

The DPSF is to be located wholly on private land historically used for grazing. Long term option agreements for use of this land have already been negotiated with the landowners. The DPSF has an estimated capital investment value of \$407million, comprising \$353 million for the DPSF 275MW solar farm, including TransGrid connection, and \$54 million for the Darlington Point Battery Energy Storage System (BESS), as independently determined by iCubed Consulting to support the planning application.

An Environmental Impact Statement (EIS) was prepared by Arup on behalf of Edify Energy, with specialist input from Environment Property Services (EPS) for ecological assessment and Charles Sturt University (CSU) for land management planning; and Kelleher Nightingale Consulting (KNC) for cultural heritage assessment. The EIS provided a description of the proposal, documented the expected impacts of the proposal on the environment and community, and details of any protective measures to be implemented during construction, operation and decommissioning. The EIS was submitted to the NSW Department of Planning and Environment (DP&E) and placed on public exhibition between 22 May 2018 to 20 June 2018.

Key environmental issues, based on the requirements of the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of the EIS included:

- Biodiversity
- Traffic and access
- Flooding and hydrology
- Aboriginal cultural heritage
- Land compatibility.

These issues were investigated by specialist assessments. The following lower risk issues were assessed for the DPSF in accordance with the SEARs including:

• Non-Aboriginal heritage

- Noise and vibration
- Visual amenity
- Soils and geology
- Air quality
- Water quality
- Resource use and waste
- Socio-economic
- Hazardous materials and development
- Electro and magnetic fields
- Bushfire risk
- Cumulative impacts.

No significant impact for any of these aspects is expected from the development of the DPSF. Any impacts are considered minor and/or manageable with the application of mitigation measures.

In addition, the project was referred to the Department of Environment and Energy for assessment under the *Environment Protection and Biodiversity Conservation Act 1999*, and received a decision of Not a Controlled Action on 16th July 2018.

1.2 Purpose of this report

Arup has prepared these submissions report on behalf of Edify Energy in response to the Department of Planning and Environment's letter dated 26 June 2018 and to fulfil the requirements of Section 85A of the *Environmental Planning and Assessment Regulation 2000* (EP&A Reg). The purpose of this Response to Submissions (RTS) report is to:

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

Thirteen (13) agency submissions, including the DP&E Response to Submissions letter, were raised during the public exhibition period. No community submissions were received on the proposed DPSF.

In response to the submissions, the proponent has updated and included the following technical reports:

- Biodiversity Assessment Report (Appendix E of this RTS report),
- Cultural Heritage Assessment Report (Appendix D of this RTS report),
- Traffic Impact Assessment (Appendix C of this RTS report), and

• Preliminary Hazard Assessment (Appendix B of this RTS report).

Many of the issues raised in submissions are considered to be adequately addressed in the EIS and existing mitigation measures.

Notwithstanding, the proponent has adopted 11 new mitigation measures, and modified 34 measures identified in the EIS. These amended mitigation measures are reproduced in Table 3, Section 3 of this RTS report and have been underlined for ease of reference.

1.3 Proposal summary

Site location

The proposed DPSF site is located on Donald Ross Drive, which is connected directly to the Sturt Highway (A20), some 3 kilometres to the north. The Sturt Highway is the national east-west highway connecting the site to Adelaide and Sydney. The site is also connected south to Melbourne via Kidman Way (B87) to the Newell Highway (A39).

The proposed DPSF project site directly adjoins the Darlington Point substation, located at Lot 2 DP628785 on three sides. The DPSF project site, including the existing Darlington Point substation, is approximately 1,042 ha, of which approximately 710 ha is proposed to be developed for the solar farm (the 'development site'). The development site includes the site infrastructure and 10m setbacks for firebreaks. The remaining land (~245 ha) will be intentionally excluded from the development site as these areas were identified as being of high biodiversity or heritage value or contain existing for electricity transmission line easements (~59.9ha).

Specifically, the DPSF project site is comprised of:

- Parts of Lot 160 of DP 821551 (referred to as 'Anderson property')
- Parts of Lots 41, 42 and 64 of DP 750903, Lot 2 of DP 542215 and Lots 18, 35 and 36 of DP 750903 (referred to as 'Tubbo Station')
- Lot 2 of DP 628785 (being the TransGrid substation site to which DPSF will connect, which is included within the DA in accordance with TransGrid's connection policy to facilitate any substation augmentation works that may be necessary as part of the development).

The site is zoned RU1 – Primary Production under the Murrumbidgee Local Environmental Plan 2013 (Murrumbidgee LEP) and is largely comprised of flat, open grasslands with some discrete pockets of remnant native vegetation. Historically the site has been used long-term for livestock grazing – sheep at Tubbo Station and cattle at the Anderson property.

The site is situated approximately 1.6km south of the Murrumbidgee River. There are no mapped watercourses within the site, however parts of the site have been subject to inundation. as a result of recent and historic major flood events. The DPSF site is located adjacent to but not within the Murrumbidgee Irrigation Area (MIA) and the Coleambally Irrigation Area (CIA).

A 330 kV and two 132 kV TransGrid overhead transmission lines cross the site from west to east, and a 33 kV Essential Energy overhead distribution line runs north-south near the eastern boundary of the site. The easements for the transmission lines would not be impacted by the proposed development of the DPSF, which has been designed to meet the minimum allowable distances for construction adjacent to overhead power lines and towers.

The site is surrounded by land zoned RU1 – Primary Production accommodating farming, agribusiness and some private residences. A series of poultry farms owned by Baiada Poultry Pty Ltd are situated on land leased to it by Arrow Funds Management to the west of the site, on the other side of Donald Ross Drive. Some workers' accommodation is provided at the Baiada farms, the nearest of which is located around 100 m to the west of the DPSF site. The nearest private residence is located around 800 m to the north of the site. All of these neighbours have been consulted throughout the development of DPSF project as part of a proactive community engagement programme.

Key components of the proposal

The proposed DPSF project is for 275 MW (AC) of solar generated electricity, including the provision for battery technology for energy storage (battery energy storage system – BESS) and resupply during peak demand. The key features of the DPSF include:

- Photovoltaic (PV) solar panels
- Steel mounting frames with piled foundations
- A single-axis tracking system
- Direct current (DC)/alternating current (AC) inverter stations
- Medium voltage electrical reticulation network (it should be noted that Edify Energy may seek to run a new single pole overhead 33 kV transmission line from the far eastern end of the site to the new switchyard adjacent to the TransGrid substation. An overhead reticulation line in this area will minimise the need for cable trenching and ground disturbance).
- A 33/132 kV switchyard and internal switchroom
- A battery yard (BESS facility), consisting of individual power pack cubicles or skid-mounted/containerised power packs and modular inverters and MV transformers, including a connection to the above switchyard.
- Internal access tracks for operational maintenance and housekeeping
- Security fencing
- Staff car park and small amenities building.

The indicative layout is shown in **Figure 1**. This figure has been amended slightly since the EIS to respond to agency submissions and confirm that the 10m firebreak is completely contained within the development site.

The DPSF project site shown in **Figure 1** is the total extent of the area for which Edify Energy is seeking approval to develop. While there are other areas shown within the wider DPSF project boundary which encompass the total available 'option lands', these areas were identified as part of the ecological surveys as being of the highest biodiversity value and have been intentionally excluded from the area over which Edify Energy are seeking permission to develop. While the layout of the project will be refined as part of the detailed design, these areas will not be developed on in any manner, indeed they will be excluded from the project's leased area and DPSF will have no right of access or entitlement to this land; it can therefore be considered excluded from the project.

This decision has been made as part of the avoid and mitigate approach to biodiversity impact and while it has come at significant cost in terms of the efficiency of the project design and layout, it nevertheless retains all threatened vegetation communities on the project site and the vast majority of other wooded areas which provide habitat for a number of bird species.



Transmission Easements

DPSF Development Site

ction Exclusion Zone

Vegetation & Heritage Prote

7 10m Firebreak Indicative Solar Panel Arrangement

Endangered EPBC Act - Weeping Myall Woodland Endangered TSC Act - Myall Woodland in the Darling Riverine

ered TSC Act - Sandhill Pine Woodland in the Riverina. Murrav-I

Indicative is to be confirmed during detailed design.
 Indicative arrangement of solar arrays to be confirmed during detailed design.



Indicative timeline

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

Table 1Indicative timeline

Phase	Approximate commencement	Approximate duration
Pre-construction	Late 2018	One month
Construction	Late 2018	12-18 months
Commissioning	Late 2019	1-3 month
Operation	Staged energisation, commencing late 2019	30 years + 20-year extension provisions
Construction of battery storage facility	Q3 to Q4 2020	Three to six months
Operation of battery storage facility	Q4 2020	Approximately 30 years
Removal and replacement of batteries	2035	Two to three months
Decommissioning	2049, unless extended in accordance with lease provisions.	Approximately six months

1.4 Exhibition period and location

The EIS was placed on public exhibition for a period of 4 weeks from 22 May 2018 to 20 June 2018. It was available electronically at

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8392 and at NSW Service Centres.

Hard copies were available at the following locations:

- Department of Planning and Environment, 320 Pitt Street, Sydney
- Murrumbidgee Shire Council: 21 Carrington Street, Darlington Point
- Nature Conservation Council, 14/338 Pitt Street, Sydney.

In addition to DP&E's formal exhibition process, Edify Energy carried out the following community consultation:

- Regular and ongoing engagement (e.g. emails, phone calls, face-to-face meetings) with landowners, neighbours, Council, local member of Parliament (NSW) and other stakeholders
- Community drop-in session at Darlington Point CWA Hall on 5 December 2017, as advertised in the Coly-Point Observer and on Council social media platforms and Edify Energy's Darlington Point project website
- Notification of the exhibition in The Griffith Area News and The Narrandera Argus, on the Murrumbidgee Shire Council's website and its social media platforms, and via the Edify Energy website DPSF page.

1.5 Project benefits

1.5.1 Key benefits

Key benefits of the proposal include:

- Contribution of approximately 275 MW AC producing some 577,000 MWh to the Australian RET
- Provision of a clean energy source, with enough power to supply around 130,000 homes each year for 30 years through the NEM (based on typical NSW household electricity consumption specified by Origin Energy in 2016)
- Assisting the RET and Paris Agreement obligations, as well as NSW's own transition to net zero emissions and accelerate advanced energy technology, including battery storage to firm otherwise intermittent renewable energy generation.
- Provision of around 300 jobs during peak construction and about five full-time jobs during operation, with an emphasis on local content amounting to circa 40% of capital deployed.
- Direct and indirect investment into the Murrumbidgee Shire during construction.
- Edify Energy's development intent is to maximise direct benefits to the local community. Opportunities for additional community benefits would be further explored throughout the planning and development process and ongoing through operations.
- Unlocks available connection capacity in TransGrid's Darlington Point node, which is identified by TransGrid as a robust node with large capacity for additional connections (TransGrid, 2016). As outlined below, there are no alternative brownfield sites (without native vegetation) within reasonable proximity to the TransGrid substation. Therefore, the proposed DPSF site is considered the optimal location for renewable energy generation at the Darlington Point node and meets the primary key criteria for large scale solar site selection (NSW Government, 2017).

1.5.2 Benefits to the local economy

In particular, Edify Energy wish to highlight the expected socio-economic benefits of the DPSF project to the surrounding areas such as Darlington Point, Coleambally, Griffith and Narrandera.

Based on the Australian Bureau of Statistics (ABS) Socio-Economic Indexes for Areas (SEIFA) (ABS, 2016a), the Darlington Point postal area (POA 2706) is in:

- the lowest 10% decile for Employment and Occupation, and
- the lowest 10% decile for Relative Socio-Economic Disadvantage

in Australia. The Index of Relative Socio-Economic Advantage and Disadvantage (IRSAD) indicated a greater distribution of lower decile scores (800 to 875)

(~60.4 percent of people) for the Murrumbidgee Local Government Area (LGA) (ABS, 2016a), which indicates a higher level of relative disadvantage in the Murrumbidgee region.

Furthermore, when compared to NSW State-wide statistics of similar economic indices, Darlington Point records relative levels of unemployment 11 percent above the State average, and a relative median weekly household income some 26 percent less than the NSW average. In fact, all similar measures of economic prosperity resulting from the 2016 Census, such as relative proportion of high income households and levels of home ownership, show the Darlington Point region to be at a significant socio-economic disadvantage relative to NSW as a whole. These statistics are clearly evidenced first-hand, through the unfortunate temporary closure of the Punt Hotel, the village pub in Darlington Point, due to lack of custom. Numerous studies have concluded that rural pubs are often the focal point for the local community, a place to come together and socially interact; the vibrancy or otherwise of such hostelries is usually a good indicator of the community as a whole. It is anticipated that the DPSF development will provide much needed local employment and economic stimulation to these local communities.

At the DPSF site, prevailing drought conditions have significantly reduced the grass cover on the Anderson and Tubbo properties in recent months. This has necessitated Tubbo Station to materially destock its livestock holding, and if the situation continues through August, further destocking will be required again. Both the Tubbo and Anderson operations are having to import feed, with the resultant increase in costs and reduction in the agricultural productivity. DPSF will assist these landowners in de-risking their businesses through a diversified and long-term income stream via the solar farm lease which is immune to seasonal and climatic effects.

In depth studies that Edify Energy have undertaken for interstate government agencies, most notably the Department of Environment, Land, Water and Planning in Victoria, has demonstrated that through construction, labour accounts for 11 percent of the total project capex, whereas local content comprising local suppliers and services amounts to 40 percent of total project expenditure. Based on the aforementioned, independently verified 'Capital Investment Value' of \$407,225,000 at DPSF, this equates to \$45 million in wages and \$163 million to local suppliers and services, as well as a material ongoing rental income to the landowners.

This also correlates with Edify Energy's direct experience of constructing a largescale solar farm at Gannawarra, near Kerang in Victoria; a similarly rural region reliant solely on agriculture. The Gannawarra Shire Council has estimated that each employee during construction spent \$80 per day locally. A similar injection into the local economy of Darlington Point could occur and assist local businesses such as the Punt Hotel.

At DPSF, Edify Energy intend to maximise the contribution of local employees, trades, suppliers and services to the project. To this end, Edify Energy has:

- Promoted an "opportunities platform" through Edify Energy's project website, which has now attracted almost 50 direct enquiries from local businesses and individuals interested in supporting the DPSF project. This database has now been provided to the preferred EPC Contractor to facilitate its resource recruitment and subcontracting arrangements.
- Building on the material disseminated through Council and at the community drop-in session on 5 December 2017, Edify Energy are engaging ICN and its *Gateway* platform (ICN, n.d.) to further connect with local suppliers with the intention, jointly with preferred EPC Contractor, of undertaking a local engagement session focused on providing more detailed information to local services and suppliers about the specific work packages available and how they can secure business opportunities during the construction of the DPSF.

The DPSF project therefore represents a unique opportunity for NSW Government to secure significant private sector investment and create material employment opportunities, in one of the most socio-economically disadvantaged areas of the State.

1.6 Proposal need and justification

Australia has committed to reducing its greenhouse gas (GHG) emissions to 26-28% below 2005 levels by 2030. The use of renewable energy helps to reduce emissions of GHGs associated with electricity generation. The Australian Government's large-scale Renewable Energy Target (RET) commenced in 2001 to ensure that at least 20% of Australia's electricity consumption comes from renewable sources by 2020. Following review, the RET was confirmed in early 2015 as 33,000 gigawatt hours (GWh) by 2020. To meet the RET, around 6,700 GW of new renewable energy capacity is needed between 2015 and 2020.

Notwithstanding the RET, solar PV is also currently one of the lowest cost forms of power generation.

The NSW Government's Renewable Energy Action Plan was released in 2013 in support of the Australian Government's RET and to guide renewable energy development in NSW to achieve maximum benefits to the State. The Plan positions NSW to increase energy from renewable sources by attracting investment, building community support, and grow expertise in renewable energy.

Key benefits of the proposed DPSF project are discussed in Section 1.5 above. It is considered that proceeding with the DPSF project would result in a balanced outcome with significant economic and social benefits, alignment with climate change and energy policy objectives for renewable energy development, and with manageable environmental impacts.

The consequences of not undertaking the DPSF project would include the loss of significant economic and social benefits to the Darlington Point region. This would be a lost opportunity for large scale renewable electricity generation feeding into the NEM at Darlington Point, given the lack of other alternative, suitable, and available sites at this key node.

1.7 Project approval under the EPBC Act

On 29 May 2018, Edify Energy voluntarily submitted a referral to the Commonwealth Department of the Environment and Energy (DoEE) under the EPBC Act and this was placed on the Department's website for public consultation from 31 May 2018 for 10 business days. No comments were received on the referral.

Subsequently, DoEE determined on 16 July 2018, that the development, construction, operation and decommissioning of Darlington Point Solar Farm (ie. the "proposed action") is **Not a Controlled Action** in accordance with the EPBC Act.

This means that the proposed action <u>does not</u> require further assessment and approval under the EPBC Act before it can proceed; or in other words, that the DPSF is not likely to have a significant impact on *Matters of National Environmental Significance* which includes nationally threatened species and ecological communities.

This NCA determination reaffirms our design and development approach to purposely avoid or otherwise minimise impacts to all threatened communities under both the Federal EPBC and NSW TSC Acts.

Details of the DPSF EPBC referral and the NCA determination can be found at <u>http://epbcnotices.environment.gov.au/referralslist/</u> ref: 2018/8218.

2 Consideration of submissions

2.1 Responses received

During the EIS exhibition period, the Department of Planning and Environment (DP&E) received submissions from a total of 12 agencies, plus comments from DP&E itself. No community submissions were received. The submissions are provided in full in **Appendix A**.

2.2 **Proponent's response to community submissions**

The DPSF did not receive any community submissions, which we believe is a testament to the proactive community consultation undertaken by Edify Energy for the project.

Since project inception, Edify Energy have engaged openly and frequently with the local community, and especially so with the landowners and near neighbours. Edify Energy adopts the International Association of Public Participation (IAP2) International Federation's "Involve" spectrum of community consultation for it's projects. During the consultation, much of the community interest has been focussed on the positive employment opportunities and potential economic uplift that the community could benefit from. The small number of issues and concerns raised by the local community, which was limited to visual impact from nearby residential properties, respecting the biosecurity of the adjacent poultry farms, and adequately managing flood risk have all been addressed in the ongoing design and layout of the solar farm to the satisfaction of the community.

Many community objections to solar farms in NSW, indeed in Australia as a whole, have been as a direct result of the displacement of strategic cropping land. The environs around the Darlington Point community, including much of the land in the direct vicinity of TransGrid's Darlington Point substation comprise both the Murrumbidgee and Coleambally Irrigation Areas. These are highly productive irrigated lands continually achieving high-yields of cotton and fruit crops. By purposefully avoiding such land, which would otherwise have led to a more favourably perceived biodiversity outcome, and instead selecting low productivity grazing lands, DPSF has avoided this impact and the community concerns it may have otherwise generated.

Finally, the local community, led by the Murrumbidgee Shire Council, clearly realises the benefits an investment of this magnitude will provide to Darlington Point and surrounding areas. These socio-economic advantages have been outlined in Section 1.5.2 of this RTS.

Edify Energy will continue to engage with the local community through the construction and operation of DPSF.

2.3 Proponent's response to government agency submissions

Agency submissions are outlined in Table 2 below with Edify Energy's responses to these submissions.

Table 2Response to submissions

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
NSW Government Planning and Environment: 20180626	1.	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.	Please refer to responses provided throughout this Response to S
20180626 Darlington Point Solar - Request RTS	2.	 In addition, the Department requests that you: Provide a Preliminary Hazard Assessment, given the scale of the proposed battery energy storage system; and Consult directly with the Office of Environment and Heritage and Murrumbidgee Council to ensure you adequately address their comments. 	Edify Energy notes that a preliminary risk screening for the propundertaken in accordance with SEPP 33 – Hazardous and Offens 2011a) as part of the EIS (refer Section 8.9 of the EIS). This prel and above other proponent's EIS submissions for the same. However, Edify Energy has undertaken a further preliminary haz (refer Appendix B of this RTS report). In preparing this PHA, Educational Science and
			 Assessment ream on 3 July 2018. Edify Energy notes DP&E's comment to consult directly with Ol comments. A face-to-face meeting with OEH, including the Regional Direct 2018 and a follow-up teleconference on 11 July 2018. Edify Energistic Edify Energy FBA calculations and BAR, and its amended mitigation measures: A face-to-face meeting with Murrumbidgee Council was held in the Chief Executive Officer and Director of Planning.
	3.	Please note that Murrumbidgee Council has advised the Department that it intends to provide its submission shortly after its Council meeting held on 26 June 2018.	Murrumbidgee Shire Council issued draft comments to Edify En- supplied on 25 July 2018. Council has notified DP&E and forma
	4.	Please provide your responses to the Department by Friday 20 July 2018.	Edify Energy has endeavoured to respond as promptly as possible have kept the Department abreast of timing and have agreed the submissions in a robust manner.

ubmissions (RTS) Report.

osed battery energy storage system (BESS) was ive Development and applying SEPP 33 (DOP, iminary risk screening was to a level of detail over

zard assessment (PHA) on request of the DP&E dify Energy met with DP&E's Hazards

EH and Murrumbidgee Council to address their

or, South-West, was held in Albury on 6 July rgy further discussed the findings of its revised s with OEH on 2 August 2018.

Jerilderie on 5 July 2018, including the Mayor,

ergy on 26 June 2018, with a final version l notices will be available following this advice.

e given the submissions received. Edify Energy necessary extensions in order to respond to all

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
NSW Department of Industry, Sydney, NSW (266279) S. Recommendations prior to project approval e Further details should be provided regarding the management of existing on-site dams during construction and operation of the project. Where they are to be removed an assessment is requested of the impacts of removing the dams on aquatic habitat and the impacts of discharging water stored in the dams. 6. • Further details should be provided regarding the quantities, sources and security of water required during the construction and operation of the project. 7. Recommended conditions of approval • That the proponent prepares a Soil and Water Management Plan as part of the Construction Environmental Management Plan in consultation with the Natural Resources Access Regulator, prior to commencement of activities.	There are six small farm dams on the site and following further d only 2 as part of the DPSF project. Section 4.6.2 of the revised E farm dams. The BAR indicates that these farm dams have poor w habitat for amphibians and waterbirds. The farm dams are used for areas of disturbed grassland. It is anticipated that only 2 of the 6 of these dams were devoid of vegetation, heavily used by cattle, a Section 7.3 of the BAR, the removal of these farm dams is unlike sheltering habitat for fauna species which may occur within the p An additional mitigation measure has been added in Section 3, T that for any farm dams that will be filled in, given the limited wa drain the water for use on site for dust suppression and civil work that minimal impacts would occur as a result of this activity. Any ongoing management is expected to be required during operation dams, there will be adequate engineering assessment to ensure th fill and compaction to ensure stability of the rehabilitated area.		
	6.	Further details should be provided regarding the quantities, sources and security of water required during the construction and operation of the project.	Edify Energy notes this comment and confirms a reduced constru- total (which is a conservative estimate that includes a reasonable confirmed during detailed design of the project. Construction was unsealed roads. Actual use would depend on weather and ground delivery to site sourced from local suppliers including the likely p cooperatives (Coleambally and Murrumbidgee). These sources has construction projects in the area. Minor quantities of water in ons Potable water use during construction will be supplied for staff ver- reticulation to amenities. The water would be of drinking water q 2ML. During operation, water would be required for staff amenities at the
			Where water is required, it would be sourced offsite and trucked been updated to indicate that potable water use is anticipated to b washing would only be used on an as required basis and only in p This has been included as an additional management measure as RTS report.
	7.	 Recommended conditions of approval That the proponent prepares a Soil and Water Management Plan as part of the Construction Environmental Management Plan in consultation with the Natural Resources Access Regulator, prior to commencement of activities. That the proponent undertakes a full soil survey prior to construction. 	Edify Energy notes this comment and confirms that a Soil and W Sediment Control Plan would be prepared, implemented and mor decommissioning of the proposed site. The mitigation measure (A SWMP would be part of the CEMP (refer Section 3, Table 3 of the Edify Energy confirms that a soil survey would be undertaken wi <i>Survey Handbook</i> (CSIRO, 2009) and that this data will inform the identification of ameliorants to be incorporated during the constru-

design consideration, it is now proposed to remove BAR indicates that the project area has six small water quality and provide only marginal potential for watering stock and are typically fringed by dams would be removed during construction. All and had poor water quality. As indicated in ely to significantly impact foraging, breeding and project area.

Table 3, Action WQ9 of this RTS report, to identify ater quantity in these dams, the proponent would ks during the construction phase. It is envisaged y remaining dams would be left unaltered and no ns. Edify Energy also confirms that in backfilling hat the methodology includes appropriate grade of

uction water estimate of approximately 80ML in e contingency allowance), but this would be ater use would mainly be for dust suppression on d conditions and would be sourced via truck purchase of water from the local irrigation have supplied water for other solar farm isite dams would also be used.

via truck delivery and stored in onsite tanks for quality and the estimated use during construction is

the O&M building and for solar panel cleaning. in to site. Section 2.7.2'Operational activities' has be of the order of 2kL per year. Water for panel periods of insufficient rainfall.

detailed in Section 3, Table 3, Action WQ8 of this

Vater Management Plan and an Erosion and initored during the construction and (Action SO1) has been amended to clarify that the the RTS report).

with guidance from the *Australian Soil and Land* the soil rehabilitation process, including the ruction stage during cable laying and for the

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		• That all underground cables and infrastructure be removed once the site is decommissioned.	decommissioning stage. The intent of this mitigation measure wa undertaken prior to construction and decommissioning and has be (refer Section 3, Table 3, Action SO2 of this RTS report).
			Cabling would be removed where practical during the decommise 500 mm below ground will be left in place). Agricultural uses of of greater than 0.5 m and therefore remaining cables would not in line with industry standard for other solar farm proposals. Cables and removal of cables during decommissioning would disturb the site control room, concrete slab for the BESS, gravel on access tr undertake consultation with the landowner as to whether the build use of the land (possibly for agricultural purposes). This would be prior to finalising decommissioning. The site would be decommis
	8.	Attachment A Water resources There are a number of small farm dams on site that the proponent indicates will be either filled or retained depending on the final design layout. There has been no assessment of the impacts of removing these dams on aquatic habitat or on the environment where discharge of water may be required. Rehabilitation of dams will be needed to ensure adequate reconstruction and stabilisation of the existing drainage channel.	As identified above, Edify Energy notes the Department of Indus provides commentary that the impacts to farm dams are considered BAR indicates that these farm dams have poor water quality and amphibians and waterbirds. The farm dams are used for watering disturbed grassland. It is anticipated that only 2 of the 6 dams wo dams were devoid of vegetation, heavily used by cattle, and had p the BAR, the removal of these farm dams is unlikely to significan habitat for fauna species which may occur within the project area As updated in Section 8.6.2 'Water use requirements', Edify Ener- layout, it is anticipated that only 2 of the 6 dams would be remove measure has been added in Table 3, Action WQ9 of this RTS rep- filled in, given the limited water quantity in these dams, the prope- dust suppression and civil works during the construction phase. A Therefore, there is not expected to be any additional impacts from methodology already considered. Edify Energy also confirms tha engineering assessment to ensure that the methodology includes a stability of the rehabilitated area.
	9.	Water resources The proponent indicates that there is no intent or need for any volumetric water licensing requirements for the proposed development and no water entitlement is needed or required to be purchased. Potential water sources have been identified as existing on-site dams and truck deliveries from local sources (unspecified). The water demands and security of accessing these supplies has not been addressed. Water in on site dams may be insufficient for the requirements of the project and a viable source of water should be identified.	As indicated above, Edify Energy notes the Department of Indust site dams. Small quantities of water would be drawn from any on the main water source for the project. An additional mitigation m Action WQ9 of this RTS report to identify that any water drawn f suppression and civil works during the construction phase. Edify Energy also proposes to obtain water from commercially as Coleambally or Murrumbidgee Irrigation areas) under appropriate contractors for the project have existing supply arrangements in p a line of enquiry with Coleambally Irrigation Area, which previou Coleambally Solar Farm.

as to indicate that the soil survey would be een amended in this RTS report for clarification

sioning phase and recycled (infrastructure at least the land do not require turnover of soil to a depth mpact on current or future grazing use. This is in s do not pose a long-term soil contamination risk e native grassland. In addition, with regard to the racks and fencing on site, Edify Energy would dings and fences would be of value to the ongoing be agreed through consultation with the landowner ssioned as agreed with the Secretary of DP&E.

try's comment regarding farm dams. The BAR ed minimal (refer Section 4.6.2 of the BAR). The provide only marginal potential habitat for stock and are typically fringed by areas of ould be removed during construction. All of these poor water quality. As indicated in Section 7.7 of ntly impact foraging, breeding and sheltering a.

ergy indicates that depending on the final design yed during construction. An additional mitigation port to identify that for any farm dams that will be onent would drain the water for use on site for Any remaining dams would be left unaltered. In discharge of the water above the construction at in backfilling dams, there will be adequate appropriate grade of fill and compaction to ensure

try's comment regarding accessing water from onnsite dams that are proposed to be filled and is not neasure has been added into Section 3, Table 3, from these dams would be used for dust

vailable sources in the local area (e.g. te water licencing arrangements. Potential place with these parties. Edify Energy has opened usly supplied construction water to the nearby

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
			This has been included as an additional management measure as RTS report.
	10.	<u>Agricultural resources</u> The department recommends that a full soil survey be undertaken prior to construction starting. In addition to soil erosion risk the survey should consider current conditions to assist future rehabilitation activities on decommissioning and aiding the restoration of land and soil capability to current or better value, and to aid in gaining full productive agricultural values.	As indicated above, Edify Energy acknowledges this comment. A measure was to indicate that the soil survey would be undertaker has been amended in this RTS report for clarification (refer Table
	11.	Agricultural resources The department recommends the removal of all underground infrastructure following decommissioning of the site. This is important if the land is returned to cropping in the future, as buried cables may become a nuisance during cultivation. The department does not consider the retention of buried cables consistent with the return of the site to its existing land capability.	Cabling would be removed where practical and recycled (infrastu in place). Agricultural uses of the land do not require turnover of remaining cables would not impact current or future grazing use. solar farm proposals. Cables do not pose a long-term soil contam the native grassland. Edify Energy has amended dot point 3 of A in Section 3, Table 3 of this RTS report as follows:
			 "Identification of any land that can be returned to current gra of >500mm would remain".
			This has been replicated under Action LU8.
			In addition, with regard to the site control room, concrete slab fo on site, Edify Energy would undertake consultation with the land would be of value to the ongoing use of the land (possibly for ag consultation with the landowner prior to finalising decommission with the Secretary of DP&E.
	12.	<u>Agricultural resources</u> The department encourages the use of grazing animals for the management of vegetation and weed control during the operation phase. This will keep a vegetative cover over the soil surface and provide opportunities for local graziers to access an alternative food source.	Acknowledged. The purpose of Edify Energy's proposed manage has sought to achieve the best biodiversity and ecological outcom- native grasslands. If grazing complements this and the grazier (T approach to the management of the land would be undertaken. H opportunity to manage exotic weeds before they set seed which it
	13.	Agricultural resources The department notes the management strategies outlined in Table 45 Recommended mitigation measures to address potential land use impacts in response to the land use conflict risk assessment, however as highlighted above the removal of all underground infrastructure is recommended to ensure that the site could be cultivated in the future if conditions allow that to happen.	Edify Energy notes this comment. Cabling at least 500 m below would not impact on current or future grazing use. This in in line proposals. Cables do not pose a long-term soil contamination risk grassland. The site would be decommissioned as agreed with the A slight amendment to Action LU8 has been made in Section 3,
	14.	Agricultural resources	Acknowledged. Action VA1 outlines that screening vegetation a agreed with adjacent landowners and in discussion with Murrum with affected landowners, potential screening vegetation would b

s detailed in Section 3, Table 3, Action WQ8 of this

As identified above, the intent of this mitigation n prior to construction and decommissioning. This le 3, Action SO2 of this RTS report).

tructure at least 500 mm below ground will be left f soil to a depth of greater than 0.5m and therefore e. This is in line with industry standard for other nination risk and removal of cables would disturb action LU8 in the revised mitigation measures table

razing land use. Any cables/pipes buried at a depth

or the BESS, gravel on access tracks and fencing downer as to whether the buildings and fences gricultural purposes). This would be agreed through ning. The site would be decommissioned as agreed

gement approach of the site, as detailed in the BAR, mes that are reasonably practicable with respect to Fubbo Station) is interested, then a mixed-use However, there is a marginal window of is best achieved by mowing rather than grazing.

ground will be left in place and remaining cables e with industry standard for other solar farm sk and removal of cables would disturb the native e Secretary of DP&E.

Table 3 of this RTS report.

and landscaping options will be considered and abidgee Shire Council if required. In consultation be considered in certain locations to 'break-up'

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		The department recommends that screening vegetation along property boundaries be planted to minimise visual amenity impacts on surrounding sensitive receptors.	views of the solar farm. Each of these neighbouring landowners is the DPSF and have not raised any concerns regarding visual imp community submissions to the EIS. No alterations to these mitigation
Crownland, Hanwood, NSW (266312)	15.	The NSW Department of Industry – Lands & Water have no objection or comments to contribute to this proposal.	Noted.
NSW Environment Protection Agency, Griffith, NSW (266283)	16.	Based on the information provided the proposed activity is not scheduled under the <i>Protection of the Environment Operations Act 1997</i> (POEO Act) and the proposed photovoltaic solar farm does not require an Environment Protection Licence. Murrumbidgee Council will be the appropriate regulatory authority for matters relating to the POEO Act for this development.On this basis the EPA has no further comments to make in relation to the proposal.	Noted.
NSW Department of Planning & Environment Division of Resources and	17.	This is a response from the Department of Planning & Environment – Division of Resources & Geoscience, Geological Survey of New South Wales (GSNSW). The proponent has addressed all requirements in relation to operating mines, extractive industries, mineral, coal or petroleum resources, and exploration activities.	Noted.
Resources and Geoscience, Hunter Region Mail Centre, NSW (266281)	18.	GSNSW notes that in relation to biodiversity offsets requirements, no offset sites have been identified at this stage.	Edify Energy acknowledges this comment and refers the reader t the proposed Biodiversity Offset Strategy (BOS) for the project. desktop assessment of potential offset sites would include a revie background ecological reports and wildlife databases would be u candidate sites for further consideration.
			Subsequent to the submission of the EIS, Edify Energy has open Council specifically regarding the identification and acquisition of use as offset sites. If suitable offset land is deemed available, this OEH processes.
TransGrid, Sydney, NSW (266310)	19.	The proposed solar farm project is located directly adjacent to TransGrid's 330/220/132kV Darlington Point Substation on Donald Ross Drive. Proposed solar farm and the TransGrid substation share common boundary on the North, East and South of the substation site. Edify Energy intends to connect to the 132kV bus bar using one of the spare bays in the North-East corner of the substation.	Acknowledged.
		Edify Energy submitted Connection Application for this project on 20 April 2017. Enquiry Response was provided by TransGrid on 8 May 2017. Subsequently, a Connection Process Agreement (CPA) was executed on 4 January 2018.	
		Feasibility of connection and scoping is currently underway in accordance with the terms of CPA. TransGrid has been working closely with Edify Energy with a view to identify optimal connection options for this development.	

has been engaged throughout the development of pact, either through direct dialogue or via gation measures are envisaged to be required.

to Section 11 of the BAR which provides detail on As indicated in Section 11.6 of the BAR, a ew of available vegetation mapping, zoning, undertaken to assist in identifying preliminary

ed discussions with the Murrumbidgee Shire of suitable land within the Murrumbidgee LGA for s will be assessed and certified in accordance with

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
Agency and Submission No. Roads and Maritime Services, Wagga Wagga, NSW (266308)	20.	The site does not have frontage to the Sturt Highway or Kidman Way but will rely on access by these roads for workers and delivery of components. Access to the development site is proposed from Donald Ross Drive. It is understood from the submitted documentation that access to the site will be via the intersection of Donald Ross Drive with the Sturt Highway or Ringwood Road with the Kidman Way during both the construction and operational phases of the project. As access to the development site is proposed from Donald Ross Drive, any access driveway should be consistent with the requirements of Council.	Acknowledged. Edify Energy propose to construct the access driv Murrumbidgee Shire Council. The access will be suitable for the exiting the site and will be paved to the site boundary. The design Council for review prior to commencement of construction.
	21.	The submitted documentation fails to identify a specific route for access to the site but instead identifies several options which will require further confirmation. The TIA identifies that access to the site for components for the solar farm is available from Adelaide and Sydney via the Sturt Highway and from Melbourne via the Kidman Way. Therefore the TIA has assumed an equal split for heavy vehicles accessing the site from Sydney, Melbourne or Adelaide representing 33% from each city. It is unusual for the components for the solar farm to be sourced from different locations.	Subsequent to the EIS, Edify Energy proposes that the principal r Way to Darlington Point, then the Sturt Highway to Donald Ross preferred port of delivery for shipment of all EPC Contractor sour modules, piles and tracking systems, inverters and cables etc. All route where this can be practicably managed. Locally sourced sup water etc would come in heavy vehicles via Sturt Highway/Donal The Donald Ross Drive access way will be consistent with the red preliminary discussions have been held in this regard with a view package' prior to the main EPC contract. No other road modificat In light of these proposed changes, a revised traffic impact assess (refer Appendix C).
	22.	It is understood that the anticipated construction period will be up to 12 months. Due to the characteristics of such a development the significant proportion of traffic generation (for both light and heavy vehicles) occurs during the construction and decommissioning stages of the development with the operational phase of the development generating limited traffic. The submitted documentation considers the heavy and light vehicle traffic generation for construction of the facility. The documentation does not finalise the preferred route for the delivery of components to the development site or the source of other products, such as the aggregate, water and sand. The submitted reports acknowledge that this development will require the preparation of an appropriate Construction Traffic Management Plan. As the proposal relies on access via the classified and local road network this plan should be finalised in consultation with the relevant road authorities, in this case being both the Roads and Maritime Services and Council.	A construction Traffic Management Plan would be developed and proponent notes Roads and Maritime Services' (Roads and Mariti in consultation with relevant road authorities (eg Roads and Mariti mentioned mitigation measure to reflect this (refer Section 3, Tab Item No. 29 below for further detail on the proposed contents of t requested by Roads and Maritime.
	23.	The submitted documentation indicates that access to the development site is proposed from Donald Ross Drive and through its intersection with the Sturt Highway. The intersection of Donald Ross Drive with the Sturt Highway is currently constructed with a sealed Auxiliary Right Turn (AUR) and Auxiliary Left Turn (AUL) treatment from the Sturt Highway. The intersection of the Kidman way with Ringwood Road is a sealed 4 way intersection with limited turn treatment.	Noted. Edify Energy proposes that all bulk equipment deliveries via the Sturt Highway and Donald Ross Drive intersection which satisfaction of Roads and Maritime. This has been updated in the
Submission No. Roads and Maritime Services, Wagga Wagga, NSW (266308)	24.	The mode of transport proposed is heavy articulated vehicles up to B-Double in size. Access for B-Double vehicles by either Donald Ross Drive or Ringwood Road is permitted but under restrictions	Noted. Should any issues be identified in these restrictions, Edify Council.

veway in accordance with the requirements of swept path of B-Double vehicles entering and n will be submitted to Murrumbidgee Shire

route to site will be from Melbourne via Kidman a Drive. Melbourne has been confirmed as the rced solar farm plant and equipment such as PV heavy vehicle traffic will be principally via this pplies such as aggregates and construction/potable ld Ross Drive intersection.

quirements of Murrumbidgee Shire Council, and to delivering these works as an 'early works tions are envisaged.

sment (TIA) has been prepared for the project

d implemented during construction. The time) comment with regard to finalising the plan time and Council) and has amended the aboveble 3, Action TA2 in this RTS report). Refer to the construction Traffic Management Plan as

will, where practicably managed, access the site has existing auxiliary turn treatment to the revised TIA (refer Appendix C, Section 3.2.1).

Energy will discuss with Murrumbidgee Shire

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		as listed in the B-Double Route approval. Any travel by these roads is to comply with the route restrictions.	
	25.	The submitted documentation indicates that the construction workforce is proposed to be housed within the local area including Darlington Point, Coleambally, Griffith and surrounding localities. It is proposed that approximately 300 construction personnel would be required on site during the peak construction period. The Traffic Impact Assessment refers to the use of a park and ride system to transport workers to and from the site and refers to the use of a parking area within close proximity to the Solar Farm site. Close proximity to the site may be along Donald Ross Drive. As the location of the parking area is not specified the traffic generation to the site is unknown.	After discussions with Murrumbidgee Shire Council on 5 July 201 as part of the DPSF project and this mitigation measure has been in this RTS report). Edify Energy has instead discussed with Council the construction phase of the project that would transport workers Street in Darlington Point, and then via the Sturt Highway and one locations between Griffith and DPSF would likely occur in Darlin Roadhouse). The bus route would operate outside of any school b disruption to local traffic. This potential mitigation measure has b TA3 in Section 3, Table 3 of this RTS report).
	26.	The submitted documentation fails to provide sufficient detail to identify the types, volumes and origin/destination of delivery, construction and personnel traffic generated during the construction period. The current intersection of Donald Ross Drive with the Sturt Highway is currently constructed to an appropriate standard to accommodate the anticipated traffic generation. Based on the information provided access to the development site, particularly for heavy vehicles, should be restricted to via the intersection of the Sturt Highway and Donald Ross Drive. As Donald Ross Drive is classed as a local road access to the site from this road shall be to the satisfaction of Council.	As discussed above, Edify Energy now proposes that the principal Kidman Way to Darlington Point, then the Sturt Highway to Dona farm plant and equipment such as PV modules, piles and tracking route where this can be practicably managed. Locally sourced sup water etc, would come via Sturt Highway/Donald Ross Drive inte volumes compared to bulk equipment deliveries. In light of these assessment (TIA) has been prepared for the project (refer Append Edify Energy notes that the current intersection of Donald Ross D constructed to an appropriate standard to accommodate the anticip are anticipated to be required on Roads and Maritime roads. As discussed above, access to the site from Donald Ross Drive wit Council.
	27.	Roads and Maritime is mainly concerned with the provision of safe access between the subject site and the public road network and the impact of the development on the safety and efficiency of the road network. Roads and Maritime emphasises the need, particularly during the construction phase of this development, to minimise the impacts on the existing road network. As the subject site is to be accessed via an intersection with the Sturt Highway or the Kidman Way which are located within a 110 km/h speed zone the following conditions are proposed for road safety reasons.	Noted. Edify Energy also affirms that safety, including safe access priority during the construction and operation of the DPSF.
		Roads and Maritime Services has assessed the Development Application based on the documentation provided and would raise no objection to the development proposal subject to the Consent Authority ensuring that the development is undertaken in accordance with the information submitted as amended by the inclusion of the following as conditions of consent (if approved):-	
	28.	1. Prior to the commencement of construction activities 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	A construction Traffic Management Plan would be developed and notes Roads and Maritime's comment with regard to finalising the authorities (eg Roads and Maritime and Council), as well as the ac and it has amended the mitigation measure to reflect this (refer Se

118, a park and ride system is no longer proposed removed (refer Section 3, Table 3, Action TA3 in il the potential use of a bus service exclusively for s from Griffith via Kidman Way, to Carrington nto Donald Ross Drive (intermediate pick-up ngton Point township and/or at the Waddi ous route times on Donald Ross Drive to minimise peen added to the proposal (refer to new Action

al route to site will be from Melbourne via hald Ross Drive. All EPC Contractor sourced solar g systems, inverters and cables etc. will be via this pplies such as aggregates and construction/potable ersection, but these would not be significant proposed changes, a revised traffic impact dix C).

Drive with the Sturt Highway is currently pated traffic volumes and therefore no upgrades

vill be to the satisfaction of Murrumbidgee Shire

ss to site and the public road network, is its main

d implemented during construction. Edify Energy he plan in consultation with relevant road additional requirements that the plan should cover ection 3, Table 3, Action TA2 in this RTS report).

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		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) Finalise details of haulage, including transport routes, volumes, vehicle type and length, timing, and frequency,	
		ii) Finalise details of any required road-specific mitigation measures.	
		iii) Require that all vehicular access to the site be via the approved access route.	
		iv) Details of measures to be employed to ensure safety of road users and minimise potential conflict with project generated traffic,	
		v) Proposed hours for construction activities, as night time construction presents additional traffic related issues to be considered.	
		vi) 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. The management of construction staff access to the works site is to include strategies and measures employed to manage the risks of driver fatigue and driver behaviour.	
		vii) Measures to address adverse climatic conditions that may affect road safety for vehicles used during construction, operation and decommissioning of the facility (e.g. fog, dust, wet weather).	
		viii) procedures for informing the public where any road access will be restricted as a result of the project,	
		ix) any proposed precautionary measures such as signage to warn road users such as motorists about the construction activities for the project,	
		x) a Driver Code of Conduct to address such items as; appropriate driver behaviour 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,	
		xi) details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck movements to and from the site,	
	29.	2. Vehicular access to the development site, particularly heavy vehicles, shall be restricted to via the intersection of the Sturt Highway and Donald Ross Drive.	Acknowledged. Edify Energy proposes that bulk equipment del restricted to the intersection of Sturt Highway and Donald Ross
	30.	3. The pick up and drop off location(s) for the proposed park and ride as referred to in the Traffic Impact Assessment shall be located at sites to the satisfaction of both the Council and Roads and Maritime Services.	As indicated above, after discussions with Murrumbidgee Shire and ride system is no longer included as part of the DPSF proje (refer Section 3, Table 3, Action TA3 in this RTS report). Edify potential use of a bus service exclusively for the construction pl from Griffith via Kidman Way, to Carrington Street in Darlingt

liveries and heavy vehicles to the site will be s Drive.

e Council, Edify Energy has proposed that a park ect and this mitigation measure has been removed y Energy has instead discussed with Council the hase of the project that would transport workers ton Point, and then via the Sturt Highway and onto

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
			Donald Ross Drive (intermediate pick-up locations between Griff Point township and/or at the Waddi Roadhouse). The bus route w times on Donald Ross Drive to minimise disruption to local traffi added to the proposal (refer Section 3, Table 3 to new Action TA
	31.	4. The Proponent must engage an appropriately qualified person to prepare a Road Dilapidation Report for transport routes particularly the intersections of the Sturt Highway with Donald Ross Drive and/or the Kidman Way with Ringwood Road 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.	As stated in the revised TIA (refer Section 5.4 of Appendix C), a DPSF site along Donald Ross Drive to its intersection with Sturt 1 prior to and post construction. It is acknowledged that Edify is ult authorities and repair of any damage to roads beyond normal wea been included as a new mitigation measure in the revised TIA (re Table 3 of this RTS report as Action TA4.
	32.	5. 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.	Edify Energy notes that based on the traffic assessment and the revia the intersection of Sturt Highway and Donald Ross Drive, and latter has sufficient auxiliary turn treatment, there are no upgrades site other than the site access itself from Donald Ross Drive whic Council.
	33.	6. 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.	Acknowledged. The vast majority of existing vegetation along the distance of the site from public roads would result in minimal glin and Maritime's recommendation, Edify Energy propose a new mit Table 3 of this RTS report that in the event of glint or glare from from a public road, glare mitigation measures such as construction device would be implemented.
	34.	7. Any works within the road reserve of the Sturt Highway or the Kidman 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.	Acknowledged. However, due to the principal access route now b Donald Ross Drive, no works within the road reserve of Kidman Maritime opines that the existing Sturt Highway/Donald Ross Dri treatment, no works within the road reserve is contemplated at thi
	35.	8. All works associated with the project shall be at no cost to the Roads and Maritime Services.	Noted.
	36.	Under the provisions of the <i>Environmental Planning & Assessment Act 1979</i> , the Consent Authority is responsible to consider any likely impacts on the natural or built environment. Depending on the level of environmental assessment undertaken to date and nature of the works it	Noted. As indicated above, after EIS submission, Edify Energy h Sturt Highway and Donald Ross Drive, and Roads and Maritime

ffith and DPSF would likely occur in Darlington would operate outside of any school bus route fic. This potential mitigation measure has been A3 in this RTS report).

A Road Dilapidation Report for the road from the Highway would be undertaken by the contractor ltimately accountable for liaison with the road ar and tear, caused by the development. This has efer Section 5.4 of Appendix C) and in Section 3,

evised bulk equipment deliveries being limited to d also noting that Roads and Maritime opines the es required to enable heavy vehicles to access the ch will be upgraded in consultation with the

he site boundaries is to be retained as well as the int/glare impacts to road users. In line with Roads hitigation measure as Action TA5 in Section 3, the solar plant being demonstrated to be evident on of a barrier (e.g. fence) or other approved

being constrained to the Sturt Highway and Way are contemplated. Similarly, as Roads and ive intersection has adequate auxiliary turn is location either.

as revised plans to focus bulk deliveries via the have indicated this intersection is adequate for

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		may be necessary for the developer to undertake further environmental assessment for any ancillary road works required as a condition on the development.	heavy vehicles. Beyond this, the only ancillary works required are Ross Drive, and Edify Energy will work with Murrumbidgee Shin
Heritage Council of NSW, Parramatta, NSW (266229)	37.	A review of the documentation indicates that no items listed on the State Heritage Register and no historic archaeology is within the subject site, or in the immediate vicinity. Therefore, the Heritage Council of NSW has no comment on this project.	Acknowledged.
Riverina Local Land Services, Narrandera, NSW (266287)	38.	Local Land Services provides consideration to, and comment in respect of, the zone of the land and native vegetation clearing. For our agency's purpose, the land is considered to be regulated land subject to authorisation for removal of native vegetation under the <i>Local Land Services Act 2013</i> . The Environmental Impact Statement (EIS) includes the below, as noted:	Noted.
		• The land proposed for SSD 8392 is freehold and zone RU1 – primary production.	
		• The development proposed is deemed State Significant Development, a major project for NSW.	
		• I have reviewed the EIS with particular regard to clearing/removal of native vegetation.	
		• Vegetation is to be offset, consistent with a Biodiversity Offset Strategy included in the BAR.	
		• A Biodiversity Offset Plan (BOP) will be developed and implemented as part of the proposal and will include ongoing grassland monitoring in association with Charles Sturt University.	
		Local Land Services note that the key biodiversity issues of concern have been considered in the EIS.	
		Clearing provisions under the Local Land Services Act 2013, section 60O states:	
		For the purposes of this Part, the clearing of native vegetation in a regulated rural area is authorised under other legislation in any of the following cases:	
		(a) The clearing was authorised by:	
		(i) a development consent under Part 4 of the <i>Environmental Planning and Assessment Act 1979</i> , or	
		(ii) a State significant infrastructure approval under Part 5.1 of that Act	
		The Darlington Point Solar Farm proposal, including vegetation clearing, is being assessed under Part 4 of the EP&A Act. The potential impacts on native vegetation are discussed in section 7.1 of the report and in more detail in Appendix C. Accordingly, as the EIS gives consideration for such clearing, LLS does not provide any additional consent as an agency. In summary, the EIS completely addresses matters with respect to vegetation clearing, offsetting and biodiversity	

re the modifications to the site access on Donald re Council to ensure this is compliant.

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		requirements and authorises activities via the Planning legislation pathway. Local Land Services has no further comment in respect to matters under Part 5 of the <i>Local Land Services Act 2013</i> .	
Fire and Rescue NSW, Greenacre, NSW (266285)	39.	Recommendations: Should a fire or hazardous material incident occur, it is important that first responders have ready access to information which enables effective hazard control measures to be quickly 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 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	Noted. An emergency response plan (ERP) and bushfire manage implemented during construction and operation and decommissi and Rescue's response and amends Action BR4 in Section 3, Ta additions.
		 down and isolating the photovoltaic system (either in its entirety or partially, as determined by risk assessment). 4. Other risk control measures that may need to be implemented in a fire emergency due to any unique fire hazards specific to the site should also be included in the ERP. 5. That two copies of the ERP (detailed in recommendation 1 above) are 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 contacts 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 members of the LEMC can be obtained from the relevant local council. 	

ment plan will be developed for the site and oning. Edify Energy notes points 5 and 6 of Fire ble 3 of this RTS report to reflect these suggested

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
NSW Rural Fire Service, Coffs Harbour, NSW (266306)	40.	 The NSW RFS recommends the following conditions be included in any approvals granted: 1. A Fire Management Plan (FMP) shall be prepared in consultation with NSW RFS MIA Fire Control Centre. The FMP shall include: 24 hour emergency contact details including alternative telephone contact; Site infrastructure plan; Fire fighting water supply plan; Site access and internal road plan; Construction of Asset Protection Zones (APZ) and their continued maintenance; Location of hazards (Physical, Chemical and Electrical) that will impact on fire fighting operations and procedures to manage identified hazards during fire fighting operations; Such additional matters as required by the NSW RFS District Office (FMP review and updates). The entire solar array development footprint to be managed as an Asset Protection 2006' and the NSW Rural Fire Service's document 'Standards for Asset Protection Zones'. A 20,000 litre water supply (tank) fitted with a 65mm storz fitting shall be located adjoining the internal property access road within the required APZ. To allow for emergency service personnel to undertake property protection activities, a 10 metre defendable space (APZ) that permits unobstructed vehicle access is to be provided around the perimeter of each of the solar array development sites including associate[d] infrastructure. 	Edify Energy notes RFS point 1 and 2 and has amended the exist include those additional items RFS has requested under the prop (refer Section 3, Table 3, Action BR1 of the RTS report). Edify Energy notes RFS's recommendation regarding a 10-metro permits unobstructed vehicle access around the perimeter of the The proponent revises the project to reflect a 10m firebreak arou proposed 20m firebreak. In addition, mitigation measure BR1 ha 10m (refer Section 3, Table 3, Action BR1 of this RTS report), v relevant. Multiple fire-fighting water tanks would be supplied across the s 20,000 L water supply tank fitted with a 65mm storz fitting shall within the required APZ. The mitigation measure has been revise BR1 of this RTS report
Office of Environment and Heritage, Albury,	41.	OEH considers that the EIS does not meet the Secretary's requirements for biodiversity and Aboriginal cultural heritage assessment (ACH).	Noted. Edify Energy's responses to individual comments on bio
NSW (266314)	42.	The EIS does meet the Secretary's requirements for flooding.	Noted.
	43.	All plans required as a Condition of Approval that relate to flooding, biodiversity or ACH should be developed in consultation and to the satisfaction of the OEH, to ensure that issues identified in this submission are adequately addressed.	Noted. Plans will be developed in consultation with the Secretary applicable.
	44.	 <u>Attachment A – Issue 1</u> The EIS and Aboriginal Cultural Heritage Assessment Report (ACHAR) contain the following issues that must be completed prior to project approval to meet requirements of the SEARS: 1. The AHIMS search is greater than 12 months accuracy. An updated AHIMS search is to be conducted and results presented in the EIS and ACHAR. Any Aboriginal sites not 	An updated CHAR is provided in Appendix D, to address OEH of Edify Energy notes OEH's comment 1 under Attachment A – Iss on 11 July 2018 and is supplied alongside the original AHIMS so Heritage Assessment Report (CHAR), which is included as Appendent search were consistent with the results of the original AHIMS se no further assessment or management is required.

ting mitigation measure BR1 in this RTS report to ponent's proposed Bushfire Management Plan

e defendable Asset Protection Zone (APZ) that solar arrays including associated infrastructure. ind the development, rather than the previously as been amended to reflect this change from 20m to while BR3 has been removed as it is no longer

site. As recommended by RFS under point 3, a l be located adjoining the internal access road ed to include this in Section 3, Table 3, Action

diversity and ACH are outlined below.

ry of DP&E and on advice from OEH where

comments.

sue 1. An updated AHIMS search was undertaken search in Appendix A of the revised Cultural endix D to this RTS report. The results of this earch. No additional sites were identified and hence

Agency and RTS Submission No. Report Issue N	Agency Comment	Proponent Response
	 previously identified will require assessment and management in accordance with SEARS. 2. Update EIS Tables 37, 39 and 41 and Figure 20 with AHIMS site numbers for the newly identified sites from the current field assessment. 3. Update Table 40 in the EIS consistent with the significance assessment in the ACHAR and in accordance with any further assessment or comments received from Aboriginal stakeholders. 4. The OEH must be notified on the discovery of Aboriginal objects under Section 89A of the NPW Act. This includes provision of: Aboriginal site recording forms submitted to AHIMS for any newly identified Aboriginal object(s) through the course of the project. Aboriginal biject(s) through the course of the project. Aboriginal Site Impact Recording Forms submitted to AHIMS for each site impacted. Reporting to the OEH on the discovery of human remains. We recommend the following protocol be included to ensure compliance with legislation in place to protect ACH in NSW and to ensure no additional harm is caused if Aboriginal sites and objects are encountered during proposed development activities, the proponent must: Not further harm the object If any Aboriginal object is discovered and/or harmed in, or under the land, while undertaking the proposed development activities, the proponent must: Not further harm the object Notify the OEH as soon as practical on 131555, providing any details of the Aboriginal object and its location Not recommence any work at the particular location unless authorised in writing by the OEH. If skeletal remains are unexpectedly encountered during the activity, work must stop immediately, the area secured to prevent unauthorised access and NSW Police and OEH contacted. 	As presented in the updated CHAR (refer to Appendix D of this I culturally modified tree, but is not confirmed to be an Aboriginal CHAR, as "Due to the damage caused to the scars as a result of the scars were created as a result of cultural modification. Further registration as an Aboriginal site on the AHIMS database". With respect to OEH's comment 4 in Attachment A – Issue 1, do identified Aboriginal sites have been notified to OEH, through the approved for sites Tubbo TRE 01 (AHIMS site id 49-5-0148), Tr TRE 03 (49-5-0150), Tubbo TRE 04 (49-5-0151) and Tubbo AF and in the CHAR (Section 5.4.1, page 21), Tubbo TRE 05 has no damage caused to the scars as a result of termite activity, it was na as a result of cultural modification. Further analysis of the scars v Aboriginal site on the AHIMS database. As Tubbo TRE 05 is not impacted by the proposed works, further analysis of the tree was With respect to OEH's comment 4 in Attachment A – Issue 1, do into the revised CHAR (refer Appendix D of this RTS report) in 1 (page 36): "An Aboriginal Site Impact Recording Form (ASIRF) must be correasonable time after the collection has been completed." With respect to dot point 3 under OEH comment 4 in Attachment Action ACH6, in Section 3 of this RTS report, which discusses th unexpected finds are discovered. This has also included in the evencountered at the site.

RTS report) 'Tubbo TRE 05' was a potential l site, as described in Section 3.2 and 5.4.1 of the termite activity, it was not possible to determine if er analysis of the scars would be required prior to

ot point 1, Edify Energy notes that the newly he submission of site cards which have been Yubbo TRE 02 (AHIMS site id 49-5-0149), Tubbo FT 01 (AHIMS site id 49-5-0152). As noted above ot been registered on the AHIMS as, due to the not possible to determine if the scars were created would be required prior to registration as an ot located within the project area and would not be s not required.

ot point 2, the following statement has been added Section 11.1 (page 35) and Section 12.1, point 14

completed and lodged with OEH within a

nt A – Issue 1, Edify Energy refers the reader to he reporting requirements in the event that went that human skeletal remains are unexpectedly

gical and Aboriginal finds, as recommended by (refer Appendix D of this RTS report,), while andling human skeletal remains.

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		Extent and timing: • Pre-determination	
Office of Environment and Heritage, Albury, NSW (266314)	45.	Attachment A - Issue 2 The Framework for Biodiversity Assessment (FBA) has not been properly applied and the impact of this development has not been adequately assessed. 6 Avoid and minimise impacts The direct and indirect impacts of the proposal have not been clearly identified. Mitigation measures can therefore not be directly related to a specific impact. The BAR should follow the guidelines for avoiding and minimism impacts set out in 8.3.2 of the FBA. 8 Application of Credit Discount to Ecosystem Credits OEH are obliged to assess the credit obligation through the FBA. The method for discounting ecosystem credits provided in section 8.6 of the BAR is not consistent with section 10 of the FBA. Installation of the solar array and associated infrastructure is likely to result in total sterilisation of the development footprint as foraging habitat for the Australian bustard. Recommended actions: • Adequate consideration and minimum information requirements for Chapter 8 of the FBA must be provided (refer to Table 21 of the FBA). • Section 10 of the FBA is correctly applied provide a reasonable offset for the probably complete loss of Australian bustard habitat within the development footprint. Extent and timing: • Pre-determination	 Additional consideration has been provided to the application of th BAR (refer Appendix E of this RTS report) has been prepared that matters, including: A comprehensive description of the direct and indirect im operation has been provided. Additional explanation of the avoid and minimise approad impacts to high value woodland vegetation and avoided at is considered to be industry best practice The assessment of the credit obligations has now been und as requested by OEH. This removes the need for discount of the calculator and the proposed updated credits have all Australian Bustard and other ecosystem credit species. Notwithstanding the above, it is noted that the NSW Biodiversity (page 5 of 33) that: <i>"During the transitional implementation period, applicatif flexible approach will be permitted to appropriately deal implementation issues or potential perverse outcomes that</i> <i>"if application of the policy or its underlying tool, the F results in perverse outcomes that do not reflect the intentitie the application of the policy or FBA to address this."</i> The original assessment within the EIS/BAR is therefore consisten transitionary period. In addition, whilst the BAR has now been updated to include perceas recommended by OEH, it should also be noted that impact is hig. At no time during the 18 days of targeted field surveys in Bustard identified on site. Anecdotal evidence from the They have never encountered this very conspicuous specie that the nearest recorded siting (as listed on OEH threaten west of DPSF near Binya (https://www.environment.nsw.gov.au/s). OEH's own literature on the species also states that <i>"the Australia and is now scarce or absent from southern and mainly found in the north-west corner and less often recomplains regions. Occasional vagrants are still seen as far end to the policy or plains as the secting of the plains and the prote-west corner and less often recomp</i>



Australian Bustard mainly occurs in inland l south-eastern Australia. In NSW, they are orded in the lower western and central west east as the western slopes and Riverine plain.

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
	46.	Attachment A – Issue 3 3.5.3 Targeted flora surveys Section 1.3 (page 25) lists the project-specific SEARS identified by OEH. It is not clear whether species credit threatened flora species requiring further consideration were specifically targeted during field survey. Recommended action: • OEH require confirmation that species credit flora survey, surveyed during the correct period and included in the BioBanking assessment. Extent and timing: • Pre-construction	 Breeding now only occurs in the north-west region of NS https://www.environment.nsw.gov.au/threatenedSpeciesApp/profile.asg The same literature also states a significant diversity of h vegetation formations and 261 sub-classes in the Riverina alteration to tussock grasslands through overgrazing, pre- fragmentation and degradation of semi-arid open grassy v baiting; specifically impacts to Riverine plains grasslands species, and equally neither the species recover measures Riverine plains grasslands. Finally, the proponent can attest that the Australian Busta Energy's solar farm sites in north Queensland both durin suggesting that any potential perceived impacts to the species Notwithstanding the unlikely impact, the Australian Bustard and of included within the revised BAR and BioBanking Credit Calculat Section 5.3.2 of the BAR outlines the project-specific SEARs spe requirements. However, to remove any ambiguity, additional clarification and er- added into the revised BAR. This appropriately confirms that all required species credit flora sp Section 1.3, have been surveyed during the correct periods and into
	47.	Attachment A – Issue 4 3.8 Field survey limitations This section states that flora and fauna required under the BioBanking calculations have been surveyed during the appropriate survey period. Recommended action: • OEH require evidence that all the species credit species that require assessment, including those listed on the SEARS as species for further consideration, were surveyed	All species credit species listed in the SEARs have been surveyed BAR has been updated accordingly, to provide additional docume This also appropriately confirms that all required species credit sp have been surveyed during the correct periods and included in the The BioBanking Credit Calculator has been updated to take into c targeted surveys identified the Superb Parrot as the only applicabl unchanged. (Note: potential impacts to the Superb Parrot were in

SW." (Ref: spx?id=10063

habitat and vegetation, outlining 29 separate he alone. Whilst quoted threats are specified as edation by foxes and cats, illegal hunting, loss, woodlands and secondary poisoning from rabbit ds are not considered a specific threat to the s nor the activities to assist this species reference

tard is regularly encountered on the Edify ng the construction and operation phases, further becies are unlikely..

other predicted ecosystem credit species has been tor as recommended.

ecies were targeted for in the appropriate survey

expansion in relation to this matter has now been

species, including those identified in the SEARs included in the BioBanking assessment.

d during the correct period. Section 3.5.3 of the entary evidence in this regard.

pecies, including those identified in the SEARs, e BioBanking assessment.

consideration OEH comments, however as the ble species credit species, the resultant impacts are included in the original assessment).

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
Submission No.	Keport Issue No. 48.	during the correct period. BioBanking Credit Calculator entries are to be updated and/or expert reports provided to fulfil all FBA survey requirements. Extent and timing: • Pre-determination Attachment A – Issue 4 Use of expert reports (Section 7.2 Vegetation Impacts) The FBA allows the use of expert reports for determining species presence or absence on a site. To use an expert, the proponent must submit a request to OEH for approval by the OEH Chief Executive. An expert report is not considered unless this approval is given. The proponent has not applied for, and the OEH Chief Executive has not granted, approval for the Charles Sturt University Graham Centre for Agricultural Innovation to provide expert advice for this project. • Experts providing reports for use in place of survey information in the BAR must be approved by the OEH Chief Executive.	The proponent does not consider that the CSU report has been use responsible for and have undertaken the full suite of ecological su the requirements of the FBA and these have been reported in the We also note that OEH was aware of the commissioning of the C to discuss the scope of the study. They provided comments about Executive approval was never raised at any time prior to the subn The CSU report was commissioned by Edify Energy as a technica of how the site will respond to the project including the changes i as microclimate impacts of the solar array. The report also provid managed. The report has been used for this purpose only as has b We consider the commissioning of the CSU report to be seeking the
		Extent and timing: • Pre-determination	 technical aspects of the impacts. We note through consultation with OEH, concerns were raised ab and how this related to the CSU report and these concerns have be In the sense that the FBA methodology refers to an expert report, expert reports: 6.6.2 Using expert reports instead of undertaking a survey 6.6.2.1 An expert report may be obtained instead of undertaking a 6.6.2.2 An expert report must only be prepared by a person who i under section 142B(1)(b) of the TSC Act, or a person who, in the specialised knowledge based on training, study or experience to p biodiversity values to which an expert report relates. 6.6.2.3 The expert report must document the information that was consideration, to reach the determination made in the expert report relates. The CSU report has not been used as an expert report on threaten has undertaken the full suite of biodiversity survey and impact ass requirements as reported in the BAR. It is considered therefore th in this context.

ed as an "expert report". EPS have been urvey and impact assessment in accordance with BAR.

SU study and participated in meetings with CSU t the scope however the need for OEH Chief nissions report.

al report to contribute to the overall understanding in the grazing regime from the current use as well de practical advice on how grasslands can be been clarified in the updated BAR (Section 1.6). the best advice possible in regard to these

bout the method for determining credit obligations been addressed in the updated methodology.

the FBA indicates the following in relation to

a threatened species survey at a development site.

is accredited by the Chief Executive of OEH opinion of the Chief Executive of OEH possesses provide an expert opinion in relation to the

s considered, and/or rejected as unsuitable for ort.

ned species or in place of survey information. EPS sessment in accordance with the FBA nat approval of the Chief Executive is not required

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
	49.	OEH Advice 1.1 Is the 'baseline' for impact assessment reasonable? Yes for flooding and Aboriginal cultural heritage. More information is required to be sure the biodiversity assessment 'baseline' has been completed according to requirements.	Noted for flooding and Aboriginal cultural heritage. The updated BAR and Credit Calculation demonstrate that the ba biodiversity. Extensive seasonal surveys across the entire site wit FBA Calculator requirements and local records of other threatened
	50.	OEH Advice 1.2 Are predictions of impact robust (and conservative) with suitable sensitivity testing? Yes for flooding and Aboriginal cultural heritage. Impacts to biodiversity have not been adequately assessed.	Noted for flooding and Aboriginal cultural heritage. Impacts to biodiversity have been considered in additional detail These revised impacts include on a more detailed assessment of r and temperature impacts. As a result, the potential impacts to the both the under panel and inter-row areas have both been increase to the limited granularity available within the calculator (i.e. can 3 only, no part increments), impacts have been rounded up and it and resulting biobanking credit determination, has been a conserve
	51.	OEH Advice 1.3 Has the assessment considered how to avoid and minimise impacts? Yes for flooding and Aboriginal cultural heritage. 'Avoid and minimise' impacts to biodiversity requires further work.	Noted for flooding and Aboriginal cultural heritage. The updated BAR provides additional analysis against the FBA r required and it is considered that the approach for the project is b all direct impacts to both threatened and endangered communitie PCT 45 Plains Grasslands via considered construction and O&M
	52.	OEH Advice 1.4 Does the proposal include all reasonably feasible mitigation options? Further identification of impacts to biodiversity is required to identify reasonable mitigation options.	The updated BAR provides additional analysis of mitigation mea considered that the project includes all reasonably feasible mitiga
	53.	OEH Advice 2. Is the assessed impact acceptable within OEH's policy context? The biodiversity assessment is not acceptable under the NSW Biodiversity Offsets Policy for Major Projects.	The project will not impact any threatened or endangered ecologic project design and layout. No threatened flora has been recorded. The two threatened fauna species recorded are highly mobile and forested areas, will be retained almost in its entirety. An updated biodiversity offsets approach is outlined in the revise undertaken in accordance with the NSW Biodiversity Offsets Pol committed to in order to ensure appropriate biodiversity outcome
	54.	OEH Advice	Noted regarding flooding and Aboriginal cultural heritage.

seline for impact assessment is reasonable for
h due consideration of the SEARs requirements,
ed species have been undertaken.

in the updated BAR and Credit Calculation. microclimate impacts including shading, rainfall e PCT 45 Plains Grasslands for the solar array for ed within the BioBanking Credit Calculator. Due only change site scores to full numbers of 0,1,2 or t is considered that the revised impact assessment vative estimate of residual impact.

equirements in relation to the avoid and minimise est practice. The DPSF has purposefully avoided s. The DPSF will further minimise impacts to practices and adaptive management plans.

sures in relation to biodiversity impacts and it is ation options.

ical communities as a result of refinements to the

their primary habitat on site, which is the

ed BAR and Credit Calculation that has been licy for Major Projects. Offsets are being es for the project.

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		3. Confirmation of statements of factFacts regarding flooding and ACH are generally correct.Sound ecological advice is needed to fully consider impacts of the proposal.	The updated BAR includes further detailed consideration of the i with potential changes in microclimate.
	55.	OEH Advice 4. Elements of the project design that could be improved Adequate consideration of biodiversity constraints.	In the planning and concept design, Edify Energy has taken all m biodiversity constraints of the site. The layout has been designed threatened woodland vegetation, and these are to be retained in th Zones. As outlined above it should be recognised that threatened ecolog threatened flora were identified during surveys and therefore are threatened fauna are being mitigated through the project's avoida mitigations for the construction and operation of the solar farm. In addition it should be noted that in respect of the Superb Parrot Action' pursuant to the Commonwealth EPBC Act.
	56.	 Attachment B Detailed Comments Flooding The EIS meets the Secretary's requirements for flooding. OEH are satisfied that the flooding assessment in Section 7.3 (page 111) of the EIS has effectively addressed flooding-related impacts of this development and will provide a basis for the appropriate design of the proposal to minimise flood risks. In summary: The simple desktop hydraulic analysis complies with OEH recommended approach and effectively identifies flow paths that cross the site in major flood events, i.e. 90-year ARI (average recurrence interval). This level of assessment is fit for purpose given the rural nature of the area and limited flood risk exposure. Flooding depth during the 90-year ARI event are expected to be less than 0.25m over a majority of the site with isolated areas of up to 0.75m. Flood waters would be slowmoving and originate from overflows of the Murrumbidgee River upstream of the site boundary during major events. The assessment has identified that the proposed location of major infrastructure, including the electricity substation and the operations and maintenance facility (but excluding the solar panel arrays that are on posts above the flood level), are not expected to be flood prone in the 90-year ARI flood event. 	Noted.

impacts of the proposal, including those associated

measures which are feasible to work within the d avoiding significant areas of higher value the Vegetation and Heritage Protection Exclusions

gical communities are not being impacted, no e not being impacted and potential impacts to ance of high value woodland habitat and proposed

t, DPSF has been deemed a 'Not a Controlled

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		• OEH support the finding that the impact on surrounding land owners is expected to be negligible.	
	57.	 OEH support the finding that the impact on surrounding land owners is expected to be negligible. Attachment B Detailed Comments Aboriginal Cultural Heritage The Aboriginal Cultural Heritage Assessment Report (ACHAR) requires more work to meet the Secretary's requirements. 1. AHIMS search currency We note in the EIS and ACHAR the AHIMS search was conducted on 20 April 2017. This is greater than 12 months currency at the time of public exhibition of the EIS. An updated AHIMS search should be conducted and results presented in the ACHAR and EIS. Any Aboriginal sites not previously identified in the EIS within the project area will require assessment, consultation with Aboriginal parties regarding significance, assessment of the impacts from development, a demonstration of avoidance where achievable; and management in accordance with the SEARS. AHIMS numbers of newly identified Aboriginal sites Update EIS Tables 37, 39 and 41 and Figure 20 with AHIMS site numbers for newly identified is ites from the current field assessment. Significance assessment in EIS The ACHAR contains assessment results that have not been updated in the EIS. Specifically, Table 40 in the EIS is missing aesthetic and historic values that are provided in the ACHAR, Likewise, social values are not identified in the EIS to be consistent with the significant assessment in the ACHAR and in accordance with any further assessment or comments received from Aboriginal stabeholders. 4. Mandatory reporting requirements to OEH Section 7.4.4 of the EIS and section 12 of the ACHAR require updating to be consistent with mandatory reporting requirements to OEH	As outlined in response to RTS Report Issue #44 above, an updat to address OEH comments. An updated AHIMS search was undertaken on 11 July 2018 and i in Appendix A of the revised Cultural Heritage Assessment Repo this RTS report. The results of this search were consistent with th additional sites were identified and hence no further assessment o As presented in the updated CHAR (refer to Appendix D of this F culturally modified tree, but is not confirmed to be an Aboriginal CHAR, as <u>"Due to the damage caused to the scars as a result of te</u> the scars were created as a result of cultural modification. Further registration as an Aboriginal site on the AHIMS database". Edify Energy notes that the newly identified Aboriginal sites have of site cards which have been approved for sites Tubbo TRE 01 ((AHIMS site id 49-5-0149), Tubbo TRE 03 (49-5-0150), Tubbo T site id 49-5-0152). As noted above and in the CHAR (Section 5.4 registered on the AHIMS as, due to the damage caused to the scar possible to determine if the scars were created as a result of cultu would be required prior to registration as an Aboriginal site on the located within the project area and would not be impacted by the not required. Edify Energy refers the reader to Action ACH6, in Section 3 of th requirements in the event that unexpected finds are discovered. To skeletal remains are unexpectedly encountered at the site. The standard procedures for discovery of unexpected archaeologi OEH, have been included as Section 12.3 of the revised CHAR (r Section 12.2 of the revised CHAR outlines the procedures for har The following statement has been added into the revised CHAR (11.1 (page 35) and Section 12.1, point 14 (page 36): "An Aboriginal Site Impact Recording Form (ASIRF) must be cor reasonable time after the collection has been completed."
		 Under Section 89A of the <i>National Parks and Wildlife Act 1975</i>, OEH must be notified on the discovery of Aboriginal objects. This includes: Aboriginal site recording forms submitted to AHIMS for any newly identified Aboriginal object(s) through the course of the project; 	

ted CHAR is provided in Appendix D of the RTS,

is supplied alongside the original AHIMS search ort (CHAR), which is included as Appendix D to ne results of the original AHIMS search. No or management is required.

RTS report) 'Tubbo TRE 05' was a potential site, as described in Section 3.2 and 5.4.1 of the ermite activity, it was not possible to determine if r analysis of the scars would be required prior to

e been notified to OEH, through the submission (AHIMS site id 49-5-0148), Tubbo TRE 02 TRE 04 (49-5-0151) and Tubbo AFT 01 (AHIMS 4.1, page 21), Tubbo TRE 05 has not been rs as a result of termite activity, it was not ral modification. Further analysis of the scars the AHIMS database. As Tubbo TRE 05 is not proposed works, further analysis of the tree was

his RTS report, which discusses the reporting 'his has also included in the event that human

ical and Aboriginal finds, as recommended by refer Appendix D of this RTS report,), while ndling human skeletal remains.

(refer Appendix D of this RTS report) in Section

ompleted and lodged with OEH within a

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		 Aboriginal Site Impact Recording Forms (ASIRFs) submitted to AHIMS for each site impacted. We note that one site (Tubbo AFT 01 / AHIMS 49-5-0152) is proposed to be impacted by the Solar Farm development and collection of surface artefacts has been recommended by Griffith Local Aboriginal Land Council as mitigation measure (KNC, 2018:35). Following collection of the stone artefacts and harm, an ASIRF must be completed and submitted to AHIMS. The ASIRF provides for an option for a SSD approved project under site impact authorisation on page one of the form. Reporting to the OEH on the discovery of human remains. 	
		We recommend the following protocol be included in the ACHAR to ensure compliance with legislation in place to protect ACH in NSW and to ensure no additional harm is caused if Aboriginal sites and objects are encountered during proposed works:	
		If any Aboriginal object is discovered and/or harmed in, or under the land, while undertaking the proposed development activities, the proponent must:	
		• Not further harm the object	
		• Immediately cease all work at the particular location	
		• Secure the area to avoid further harm to the Aboriginal object	
		• Notify the OEH as soon as practical on 131555, providing any details of the Aboriginal object and its location	
		• Not recommence any work at the particular location unless authorised in writing by the OEH.	
		• If skeletal remains are unexpectedly encountered during the activity, work must stop immediately, the area secured to prevent unauthorised access and NSW Police and OEH contacted.	
	58.	<u>Attachment B Detailed Comments</u> Historic Heritage	Noted. The proponent refers the reader to Issue No. 37 of this I Division – Heritage Council of New South Wales submission.
		We are unable to comment on the Historic Heritage Assessment provided within the EIS. OEH's Heritage Division are the appropriate contact for historic cultural heritage. Please forward the relevant sections to <u>heritage@heritage.nsw.gov.au</u> , if a copy of the assessment has not already been provided.	
	59.	Attachment B Detailed Comments Biodiversity	The proponent has noted the comments by OEH. In responding and provided a draft of the BAR for review and discussion in a made material changes to the BAR to address OEH comments.
		The Biodiversity Assessment Report (BAR) at Appendix C does not meet the Secretary's requirements for biodiversity.	Secretary's requirements for blodiversity.

RTS report for the response from OEH's Heritage

g to these submissions, we have consulted with OEH advance of submission of this RTS report. We have be believe that this revised BAR meets the
Agency and RTS Submission No. Report Issue No.	Agency Comment	Proponent Response
	 The Framework for Biodiversity Assessment (FBA) has not been properly applied and the impact of this development has not been adequately assessed. The BAR fails to provide an ecological sound basis for justifying a reduction in ecosystem credits, and the discount has not been determined or assessed using the FBA. OEH would not support a proposed discounted offset for PCT 45 'Plains Grass grassland on alluvial mainly clay soils in the Riverina Bioregion and NSW South Western Slopes Bioregion' because the proposal does not adequately offset the loss of threatened species habitat. 	The FBA methodology has been applied and further analysis and This includes a comprehensive assessment of the impacts of the As noted above, the offset credit requirements have now been as requested by OEH and the calculator is supported by the detailed impacts. No reduction in the generated ecosystem credits is now The revised BAR is no longer is proposing a discounting method has been undertaken within the calculator using the FBA Guideli species (such as the Australian Bustard) have been applied as per proposed in line with the outputs of the calculator.
60.Attachment B Detailed CommentsBiodiversityBiodiversity Development Assessment Report1.1.2 Construction MethodologyOEH appreciate the provision of detailed information about co the proposal. However, statement about regrowth following co evidence of regenerating non-specific grasses in other location the loss of condition of native species diversity and cover in ar native grassland (PCT 45).	Attachment B Detailed Comments Biodiversity Biodiversity Development Assessment Report 1.1.2 Construction Methodology OEH appreciate the provision of detailed information about construction and operation methods for the proposal. However, statement about regrowth following construction and photographic evidence of regenerating non-specific grasses in other locations (page 18, 20) are not relevant to the loss of condition of native species diversity and cover in areas mapped as moderate condition native grassland (PCT 45).	Construction methodology and information was provided in Cha for the purpose of allowing OEH to understand the impacts durin and this has now been integrated into the sections of the updated It is acknowledged that the information about the impacts of con applicable to this site. It is accepted that different ecosystems will depending on the specific species and conditions which exist at t perseverance of vegetation and ecosystems from a range of differ demonstrate that this will be the case at this site. However, given the lack of other available information on the im this information in the BAR was intended to provide some conte typical impacts of solar farms and encompassing a wide geograp Queensland. The assessment has not relied on this evidence and the scientific knowledge available about the species specific to th updated BAR.
61.	Figure 1-2 proposed development footprint (page 17) The site map does not show areas of complete biodiversity loss such as hardstand areas and tracks. Figure 4 in the EIS (page 12) gives a better picture of the proposed development, however the location of roads or tracks are still not known. Section 7.6 (page 106) mentions that a 'fire buffer' of 20m will be incorporated around the 'retained woodland and grassland habitat'. This area must be included in the development footprint.	The final detailed design of the solar farm will be developed und work has been undertaken to date to allow an assessment of the i design has been further optimised since the original EIS/BAR su Pending the detailed design for final road corridors, inverter plac full extent of the development footprint with the application of a inverters etc. This ensures that, within the confines of the bound and/or inverter placements etc changes slightly, the impact assess within the PCT 45 grasslands and not total surface area impacts t The DPSF will not disturb any areas out with the defined 'Develop The preliminary project layout is provided as Figure 1-3 of the up
62.	1.4 Definitions (page 26) Terms and definitions used in the BAR should follow the FBA.	Further explanation of definitions has been provided in the updat

d description of this is contained within the BAR. development.

ssessed fully within the FBA calculator as d surveys and ecological assessment of the v being proposed outside of the calculator.

dology for PCT 45, rather the impact assessment lines, and it is noted that all ecosystem credit er the FBA calculator. Offsets are therefore being

apter 2 of the original EIS and upfront in the BAR ng construction. We have noted OEH comments I BAR discussing the impacts of construction.

nstruction of other solar farms may not be directly ill not necessarily be impacted in the same manner the site, and hence that demonstrating the erent climates and locations does not necessarily

npacts of solar farm construction in the literature, ext for the approach to the assessment based on the phy from the ACT through to Far North has focussed on assessing the impacts based on he site. This has been further acknowledged in the

der the EPC Contract, however sufficient layout impacts. Edify Energy notes this preliminary ubmission.

cements etc, the impact assessment is based on the a volumetric allowance for roads, buildings and dary extent, if the final alignment of road corridors ssment remains valid as it is only final location that may vary slightly.

lopment Site'.

pdated BAR.

ted BAR. As outlined in the updated BAR:

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
			For the purposes of this BAR, two main types of areas are referre "Development Site". The Study Area was provided by Edify and covered the original r biodiversity surveys have been completed throughout the study are inform biodiversity constraints and inform project avoidance meat the definition in the FBA methodology however it extends much indirect impacts are likely to occur, because the project design has important parts of the study area completely. The Study Area also surveyed and will not be affected by the project, due to early site The Development Site is a term specified in the FBA methodolog Development Site is "an area of land that is subject to a proposed Once the biodiversity surveys were completed within the study are key biodiversity characteristics. The Development Site (for which FBA methodology) for the purposes of this report is only the area Development Site and the Development Footprint (in accordance interchangeable. This is because the FBA methodology defines D directly impacted on by a proposed Major Project that is under th used to store construction materials". The Development Site for t associated with the project, including direct impacts (roads, firebut facility, inverters and hardstand, piles) and indirect impacts (pane within the solar array but not proposed to be altered by the project
	63.	1.7 Australian Project Grassland Experience (page 29) The photographs of non-specific grass growth under solar panels do not provide evidence of the potential impact of the solar panel array on PCT 45 and the ecosystem species that rely on this vegetation for habitat. Statements about the likely response of native grasslands in the Riverina following disturbance from construction are not supported by evidence from peer-reviewed ecological studies.	It is acknowledged that different ecosystems will not necessarily specific species and conditions which exist at the site, and hence and ecosystems from different climates and locations does not ne this site. This information in the BAR was intended to provide so based on the typical impacts of solar farms. The assessment has n assessing the impacts based on the scientific knowledge available been acknowledged in the updated BAR. This section of the report has been relocated to an Appendix cons only.
	64.	3.5 Flora survey methods (page 38) It is important to mention in section 3.5.1 that floristic surveys for the BioBanking plots were undertaken in April. Even in a wet autumn, most herbaceous species in the Riverina will be infertile and difficult to identify or not apparent above the ground. Diversity in native grasslands is best captured in spring when most non-grass species are above ground, flowering and identifiable.	The biobanking plots were undertaken in April which still meets flora survey with additional surveys focusing on threatened speci- also capturing any opportunistic observations of flowering specie would usually be best captured in spring. In this case however ad and it was noted that during the April surveys a greater biodiversi- than in the September surveys. This was due to the development is indicative of the year on year variation in site conditions. This BB Plots were at or above their biobanking benchmark for florist excludes the poor quality grassland). Opportunistic observations September and November during the targeted surveys within both

ed to. These are the "Study Area" and the

maximum potential extent of the project. Seasonal area in order to define the biodiversity values, easures. In this context, "Study Area" is similar to a further in some instances than any direct or as been modified to avoid large biologically so includes two areas that weren't actually e boundary discrepancies.

by the FBA methodology states that the d Major Project that is under the EP&A Act". Area, the design of the project was altered to avoid the impacts are to be offset in accordance with the ea to be impacted by the project. For this BAR, the e with the FBA methodology) terminology is Development Footprint as "the area of land that is the EP&A Act, including access roads, and areas the purposes of this BAR includes all impacts preaks, switchyard, office and car park, battery are area, inter-panel area and surrounding areas the tot.

be impacted in the same manner depending on the e that demonstrating the perseverance of vegetation ecessarily demonstrate that this will be the case at ome context for the approach to the assessment not relied on this evidence and has focussed on le about the species specific to the site. This has

sistent with it use to provide empirical context

the requirements of the FBA in terms of general ties undertaken in spring for the DPSF project and es. It is acknowledged that typically, diversity dditional surveys were undertaken in September sity was observed in flowering herbs and shrubs to site being drier during the September period. This is shown in the BioBanking plot data, as 22 of the stic biodiversity in all of the vegetation zones (this of flowering species were conducted in th the grassland and woodland habitats and have

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
			been included in the reporting works. Therefore, a high number of this project.
	65.	 3.5.3 Targeted flora surveys (page 42) Section 1.3 (page 25) lists the project-specific SEARS identified by OEH. It is not clear whether species credit threatened flora species requiring further consideration were specifically targeted during field survey. Habitat preferences, likelihood of occurrence and potential impacts on threatened flora appear to be provide in Appendix 4. Riverina grassland is the only known habitat for <i>Sclerolaena napiformis</i>, which is endangered under the State and Federal legislation, so should have been specifically targeted in the development footprint. This species is identified from other <i>Sclerolaena</i> by seed and vegetative characteristics, rather than its minute flowers. One of the few collections of <i>Convolvulus tedmoorei</i> in NSW was made near Darlington Point. We note that <i>Convulvulus enubescens</i> was recorded in the Biobanking plots, however following a revision of the genus in 2001 (Johnson 2001), <i>C. erubescens</i> is highly unlikely to occur in the area. Seeds are important for identification, so survey a month or so after flowering is ideal. Habitat preferences for <i>Lepidium monoplocoides</i> should include grassland and this species also should have been targeted during searches of PCT 45. Recommended actions: OEH require confirmation that species credit flora species listed in Section 1.3 were specifically surveyed during the targeted flora survey, surveyed during the correct period and included in the Biobanking Assessment. 	Section 5.3.2 of the report outlines that SEARs species were targ However for clarity, we have updated the BAR with survey table Justification for the targeted surveys for these threatened species to reflect these species and any other relevant species requiring st <i>Sclerolaena napiformis</i> Whilst, no specific targeted surveys were it generally occurs as procumbent to erect shrub with slender bra <i>Sclerolaena muricata</i> was observed within the woodland and gra and have 5-6 spines. <i>Sclerolaena muricata</i> was identified within distinctive white branches covered in a large number of spines ar shrubs were recorded within the development site during any of t Only two records for <i>Convolvulus tedmoorei</i> have been recorded species was not recorded during the parallel transect surveys con- <i>erubescens</i> have been recorded within the area within the a 20km OEH bionet atlas database. It is considered highly unlikely to occ since 1969 have been recorded despite a large number of vegetat Point and wider district. These surveys were conducted by experi if it was present it would have been recorded during the surveys i <i>Lepidium monoplocoides</i> – The predominate habitat is in the woo grassland communities. All the records recorded in the recovery p occur in small populations within roadside ditches. In the <i>Lepidiu</i> species has been recorded as flowering in both spring and summe conducted in September in both the woodland and grassland habi period. Grassland within the development site is dry and is not re The development site is currently subject to high levels of grazin this is noted as being one of the high threats to this species. It is considered that all likely species credit flora species were sur- further consideration.
	66.	Table 3-2 PCTs, Zones and BioBanking plots (page 40) The justification that Zone 6 (PCT 28 White Cypress Pine open woodland) will not be impacted by the proposal is not adequate for reducing the number of BioBanking plots completed in Zone 6. This vegetation zone may be part of the Sandhill Pine Woodland in the Riverina, Murray-Darling Depression and NSW South Western Slopes bioregion endangered ecological community listed on the Biodiversity Conservation Act 2016.	PCT 28 White Cypress Pine open woodland and its habitat will n been avoided and protected within the Vegetation and Heritage P of the patches and that all of the community is in one condition o missing is not considered likely to be of critical importance, parti development site for this project has been defined as only includi that will require offsets to be provided.

of flora species would have been detected as part

eted for in the appropriate survey requirements.

es for all species credit species.

s is outlined below and the BAR has been updated survey.

e conducted for this species it is distinctive in that anches sparsely covered in appressed hairs assland areas. The fruit are light brown in colour the development site and this species has nd is a large round shrub. No other *Sclerolaena* the multiple seasonal survey events.

I near the development site being from 1969. This nducted in September and November. *Convolvulus* rded, however over 100 records for *Convolvulus* n x 20km radius of the development site on the ecur within the development site as no records tion surveys being conducted within the Darlington rienced botanists. In any event it is considered that in the appropriate season.

odlands areas and has been recorded within plan have been in areas subject to flooding, some *um monoplocoides* recovery plan notes that, this her. Extensive transect surveys have been bitats and this species was not recorded during this egularly inundated or has pockets of wet areas. Ing from rabbits, kangaroos, sheep and cattle and

rveyed in the correct season and do not require

not be impacted as all areas of occurrence have Protection Exclusion Zones. Due to the small size of good to moderate – moderate a single plot ticularly as it is to be fully retained. The ling those areas likely to be impacted by the project

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		The FBA requires assessment of biodiversity values over the whole development site (FBA 3.3 page 5), which is defined as the entire site not just the proposed development footprint. The detailed site design has not been completed. Assessment of biodiversity values on the entire site is required if other constraints necessitate extra vegetation clearing in the future, or accidental clearing or disturbance occurs outside the proposed development footprint and the proponent requires additional offsets. There is no explanation about why a rectangular area in the centre of the norther boundary that appears to be inside the development site is not included in any of the surveys.	Edify Energy will only lease the development site (i.e. where the build a fence around the footprint, thus there can be no risk of ad- subdivided from the surrounding land. The northern area which was not surveyed was identified as a hea and thus purposely excluded from the Development Site at an ear
	67.	3.6.3 Fauna habitat assessment The assessment of hollows in paddock trees mentioned in table 3-5 should be fully described in this section.	The updated BAR now includes a full description of this survey p
	68.	3.6.4 Bird species with a high likelihood of occurrence (page 47) This section should refer to section 3.7 and appendix 4 where habitat suitability and likelihood are presented.	Noted, reference to Section 3.7 and Appendix 4 has been added i
	69.	Plains-wanderer targeted surveys (page 51) OEH require targeted surveys for Plains-wanderer (<i>Pedionomus toruqatus</i>) to be 50m apart. However, the site visit undertaken by OEH on 24 July 2017 confirmed that the site was not core or primary habitat for plains-wanderer so further assessment is not required.	Noted.
	70.	 3.8 Field survey limitations (page 54) This section states the flora and fauna required under the BioBanking calculations have been surveyed during the appropriate survey period. <u>Recommended action:</u> OEH require evidence that all the species credit species that require assessment, including those listed on the SEARS as species for firther consideration, were surveyed during the correct period. BioBanking Credit Calculator entries are to be updated and/or expert reports provided to fulfil all FBA survey requirements. 	All surveys for SEARs listed species and other species credit spe within the correct survey periods in accordance with the FBA. For clarity, the updated BAR includes the SEARs species survey of the SEARs species were recorded as a result of the targeted su
	71.	4.2 Landscape value assessment The IBRA subregion in the BioBanking Credit calculator is LA-Murrumbidgee. Is that the correct region? If not, are there implications for the calculator results?	It is agreed that the IBRA subregion should be MR Murrumbidge BioBanking Credit Calculator and report. As a result, some addit the updated BAR outlines how these species have been surveyed, the development site apart from the Superb Parrot and appropriat species in the Biobanking Credit calculation.

solar farm will operate) from the landowner, and
ditional or accidental clearing. These areas will be
-
avily vegetated area during the initial screening
rly stage.
meaning and magnite
process and results.
into this section of the updated BAR.

ecies that have potential to occur were surveyed

y details in Section 3.5 of the updated BAR. None urveys.

gee and we have amended this in the updated ational species were listed as requiring surveys and d. No species credit species were recorded within ate offset credits have been provided for this

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
	72.	4.3.2. Plant community types (page 60) The map of PCTs and Biobanking plots should also include reference to the vegetation zones used for the BioBanking assessment.	Table 4-5 in the updated BAR provides the vegetation zone numb Credit Calculation.
	73.	4.4 Flora species recorded (page 73) This section should acknowledge limitations of the floristic survey being undertaken in April. Fewer of the characteristic herbaceous species that may be present on the site would have been present or identifiable than if survey had been undertaken in spring.	The vegetation and biobanking surveys were conducted in Autum survey time to capture identification of a greater number of herba surveys a greater biodiversity was observed in flowering herbs ar development site was drier during the September period. This is BB Plots were at or above their biobanking benchmark for florist excludes the poor quality grassland). Opportunistic observations September and the November during the targeted surveys within have been included in the reporting works. Therefore, a high num part of this project.
	74.	5 Threatened biodiversity (page 78) Please confirm whether the assessed paddock trees provided potential habitat or were observed to be habitat for threatened species.	As outlined in the updated BAR in Section 7.7 the vast majority of woodland areas of the site will be retained, however, six isolated removed by the project, within the grassland vegetation of the de combined 39 hollows. One of these trees contained a large stick a bird of prey nest. No fauna was recorded nesting in any of the h nesting within any of these trees. The vast majority of the open for of the project.
	75.	5.2 Species credits (page 81)It is assumed that the title for this section should include Lanky Buttons, rather than Winged Peppercress, which is the common name for <i>Lepidium monoplocoides</i>.	This section of the updated BAR has been updated to take this co consideration.
	76.	5.3.1 Fauna species This section includes the first mention that six hollow-bearing paddock trees are likely to be removed as part of the project.	The methodology in Section 3.6 of the updated BAR has been up
	77.	 6 Avoid and minimise impacts The FBA requires the proponent to demonstrate that reasonable measures have been taken to avoid and minimise the direct and indirect impacts of the proposal on biodiversity values. The direct and indirect impacts of the proposal have not been clearly identified. Mitigation measures can therefore not be directly related to a specific impact. The BAR should follow the guidelines for avoiding and minimising impacts set out in 8.3.2 of the FBA. 	 A much-expanded Section 6 and Section 7 of the updated BAR a addressing the required FBA Chapter 8 factors. As outlined in the A detailed description of the projects approach to avoid and of the updated BAR, incorporating guidance from Section 8. A comprehensive description of the direct and indirect impact microclimate - shading, rainfall redistribution and temperatu flora species and on threatened species which use the habitat

bering that relates to the updated Biobanking

mn. While Spring is usually considered the ideal baceous species due to flowering, during the April and shrubs than in the September surveys, as the shown in the BioBanking plot data, as 22 of the stic biodiversity in all of the vegetation zones (this s of flowering species were conducted in a both the grassland and woodland habitats and mber flora species would have been detected as

of trees (including those with hollows) within d paddock hollow-bearing trees are required to be evelopment site (Appendix 7). These trees have a a nest in the upper branches of the tree likely to be hollows. The Superb Parrot was not recorded forest and woodland areas will be retained as part

omment and other relevant factors into

pdated to address this comment.

addresses this comment, including specifically ne updated BAR:

I minimise impacts has been provided in Section xx 8.3.2 of the FBA

acts has been provided including an analysis of ure changes. The likely impacts of these on native at has been assessed.

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		 Impacts should include at least consideration of sinaling and species diversity, concentration of rainfall and rain shadows beneath the panels, soil erosion potential in storm events, temperature changes beneath the panels, and changes to specific habitat requirements for threatened species. There is discussion on page 97 and 98 about mitigating impacts of the solar array on grassland diversity, habitat value and fire risk. Fuel load has not been identified as an impact to threatened species of their habitats. Buffers Section 7.6 (page 106) mentions that a 'fire buffer' of 20m will be incorporated around the 'retained woodland and grassland habitat' that would 'require removal of some of the woodland habitat'. The buffer is included in this section as an impact mitigation. OEH consider that installing firebreaks within woodland does not demonstrate avoidance of impacts, and that temporary fencing around woodland and threatened ecological communities in which no disturbance or clearing is to occur is a more appropriate mitigation measure. Impacts to Plains Grass grassland (PCT 45) Section 1.6 (pages 28-29) states that there is a depth of agricultural knowledge to understanding of current scientific knowledge about the ecological functioning of <i>Austrostipa aristiglumis</i>- dominated grasslands or provide evidence about how their component species respond to the likely microclimatic impacts, their ability to be rehabilitated or predicted changes in species composition and how that impacts threatened species habitat. Recommended action: <i>Adequate consideration and minimum information requirements for Chapter 8 of the FBA must be provided (refer to Table 21 of the FBA).</i> <i>Require all fire breaks to be within previously disturbed or cleared area, and not within a buffer around retained vegetation. A protection buffer from all disturbance and clearing should be placed around mapped woodland to minimise edge effects fro</i>	 It is noted that fire buffers will be incorporated into the grass encroaching into the woodland habitat beyond the developm. The discussion about fuel load has been included in the BAR solar array area will require mowing or grazing to maintain f clarified as an impact in the updated BAR, Section 7. It is no recommended to be maintained to prevent a loss of biodivers. The assessment acknowledges the complex nature of predict the best available information has been sought and studies ba Measures have been incorporated in the updated BAR, Section Ex More detailed information on this consideration against the require the updated BAR.
	78.	 7.2 Vegetation impacts (page 102) This section fails to identify specific impacts to habitat values due to construction and operation of the solar array. The potential loss of diversity due to microclimatic changes to soil, water, availability and sunlight has not been addressed. While the site is not 'pristine' and has a long history of grazing, most of the grassland floristic plots met the benchmark for floristic species diversity when sampled during autumn, and the vegetation 	Section 7 of the updated BAR has been amended to more comple definition of how individual project component impacts have bee removal of vegetation), indirect solar array area impacts (constru- management measures and a range of potential other impacts. The microclimate are addressed in the updated BAR Section 6 and 7. It is not considered that the CSU report has been used as an "expe- refers to an expert report. The EBA indicates the following in rele-
		description for PCT 45 in the BAR states that there is high native diversity. This evidence shows	receive to an expert report. The t bit indicates the following in fel

sland areas of the development site and are not nent site boundary.

R as a recognition that the grasslands within the fuel load within acceptable limits. This has been oted however that mowing, or grazing is also rsity and thus serves a dual purpose.

ting the response of PCT 45 to impacts, however ased on the specific site have been commissioned.

ion 6 to prevent edge effects on the retained acclusion Zones).

red FBA components is provided in Section 6 of

etely address the FBA requirements, including een calculated, likely direct impacts (complete action and operation), proposed Plains Grassland The potential impacts due to changes in

pert report" in the sense that the FBA methodology lation to expert reports:

Agency and Submission No.RTS Report Issue No.Agency Comment	Proponent Response
 that the proposal site has been subject to a more conservative grazing regime than other remnants of native grassland on private land. Consideration of the CSU report OFH have provided consistent advice, including at the site visit on 24 July 2017, email on 30 October, by phone on 10 November 2017 and on 19 March 2018 in response to the draft BAR, that the key issue for this site is the impact of the solar farm on biodiversity – the vegetation community, not just the dominant grasses, and that the assessment must address the impact of the solar farm on ecological functioning of the site's native vegetation. The FBA allows the use of expert reports for determining species presence or absence on site. To use an expert, the proponent must solmit a request to OFH for approval by the OEH Chief Executive. An expert report is not considered unless this approval is given. While the authors of the report have recognised expertise in agronomy, we have strongly recommended that the proponent consult expert grassland ecologists for advice on potential impacts and mitigation measures. The proponent has not applied for, and the OEH Chief Executive has not granted, approval for the Charles Sturt University Graham Centre for Agricultural Innovation to provide expert advice for this project. We have identified limitations of the study that would indicate that an agronomy-based approach is not appropriate for informing the project. The CSU report identified very few of the forts that are listed in the Biobanking plots, which were sampled at a suboptimal time for species detection, and concentrated their assessment on native grassses in the used by the advite the assession region would be nave as duced to 2008 praving and mowing, the native for Component is 'unlikely to be affected greaty'. The lower number of species reported by the CSU report inducates that the survey design for the CSU report may not be suitable for sampling the range of life form	 6.6.2 Using expert reports instead of undertaking a survey 6.6.2.1 An expert report may be obtained instead of undertaking a 6.6.2.2 An expert report must only be prepared by a person who is under section 142B(1)(b) of the TSC Act, or a person who, in the specialised knowledge based on training, study or experience to p biodiversity values to which an expert report relates. 6.6.2.3 The expert report must document the information that was consideration, to reach the determination made in the expert report. The CSU report has not been used as an export report on threatench has undertaken the full suite of biodiversity survey and impact ass requirements as reported in the BAR. It is considered therefore that in this context. The CSU report was commissioned by Edify Energy as a technical of how the site will respond to the project including the changes in as microclimate impacts of the solar array. The report also provide managed. The report has been used for this purpose only as has be the commissioning of the CSU report to be seeking the best advice the impacts.

a threatened species survey at a development site.

is accredited by the Chief Executive of OEH opinion of the Chief Executive of OEH possesses provide an expert opinion in relation to the

s considered, and/or rejected as unsuitable for ort.

ned species or in place of survey information. EPS seessment in accordance with the FBA nat approval of the Chief Executive is not required

al report to contribute to the overall understanding in the grazing regime from the current use as well de practical advice on how grasslands can be been clarified in the updated BAR. We consider ce possible in regard to these technical aspects of

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
	79.	 8 FBA Assessment 8.5 Biodiversity Credit Requirement Calculations (page 114) Ecosystem credits are used to measure the loss of biodiversity values. The offset requirements for PCT 45 on the proposal site is to compensate for the loss of habitat for ecosystem credit threatened species. In the BioBanking credit calculation for the proposal, the ecosystem species with the highest Tg value for Zone 1 PCT 45 is the Australian Bustard (<i>Ardeotis australis</i>). That means that 25,061 ecosystem credits are required to compensate for loss of foraging habitat for the Australian bustard. The Australian Bustard very large, heavy-bodied, ground-dwelling bird up to one m tall. The larger male has a wingspan of up to 2.3m. It mainly inhabits tussock and hummock grassland where it forages and sometimes roosts and is occasionally observed in pastoral and cropping country. Specific threats are alteration to tussock grasslands through overgrazing, and loss, fragmentation and degradation of semi-arid open grassy woodlands (OEH 2018). 	The offset credit calculation has now been undertaken fully within issue No. 81 below. The revised methodology does not apply any generated as all impacts have been entered into the site values in t methodology. It is noted that the Australian Bustard is the species impacted management zones affected by the project and as such th provide appropriate compensatory habitat for this species (and the values). The application of the OEH recommended method for assessing th calculator does not however generate a requirement for 25,061 create the Australian Bustard and is reflected in the updated Biobanking Despite generating these credits, the project is not expected to hav Refer to response to issue No. 46 for further details.
	80.	 8 FBA Assessment 8.6 Application of credit discount to ecosystem credits Application of the FBA When applying to the FBA, assessors have the option to record partial clearing or partial impacts in a vegetation zone to allow for variation in impact. This is based on consideration of the starting values for each of the ten condition attributes and expected future value. In this case, the impacts of any clearing as well as the direct and indirect impacts of shading due to the solar array would be considered separately. Section 10.3.1.3 of the FBA allows for the calculation of a different 'future site values' score for these separate parts of vegetation zone. To use this method, the assessor must separately map these areas of the vegetation zone and include the map in the BAR. The calculator would then determine the loss in condition which contributes to determining the final credit obligation. This approach was not used by the proponent. The FBA does not provide the opportunity to discount the credits after the calculator has produced the Biodiversity Credit Report. OEH are obliged to assess the credit obligation through the FBA. The method for discounting ecosystem credits provided in section 6.8 of the BAR is not consistent with section 10 of FBA. OEH South West Branch have recently become aware of the Capital Solar Farm in Palerang LGA, where the area under the array is to be maintained as native pasture. The project was approved in 2010 and included a proposal to reduce offset requirements for solar array construction and operation in a native pasture environment. 	 The updated BAR and Credit Calculations now incorporate the redincorporating partial impacts within individual management zones section 10 of the FBA. One of the challenges with this approach is the limited granularity two possible scores which can be assigned to native ground cover the benchmark. Our approach in some areas has therefore been to otherwise have been assessed to create a difference in the current resulted in a conservative assessment. This revised approach, taking into consideration OEH's submission increase in biodiversity credits being committed to in order to offs. We appreciate OEH pointers to projects which may be good examinipacts. Notwithstanding the above, it is noted that the NSW Biodiversity (page 5 of 33) that: "During the transitional implementation period, applicatification of the policy or its underlying tool, the I results in perverse outcomes that do not reflect the intentions of the application of the policy or FBA to address this." The original assessment within the EIS/BAR is therefore consister transitionary period.

in the FBA calculator as recommended by OEH in a discount factors to the ecosystem credits the calculator in accordance in the FBA s with the highest multiplier for a majority of the the calculated credit requirement are considered to e other ecosystem credits species with lower Tg

the project impact within the Biobanking redits. This is in line with the expected impacts to g calculation requirements.

ve a material impact on the Australian Bustard.

ecommended approach by OEH for this project for s. Thus the revised assessment is consistent with

y in the calculator. For example, there are only r for site attributes ranging from 10% to 100% of o reduce a score to a lower value than what may and future site value scores. This we believe has

on and follow-up comments, has resulted in an fset the biodiversity impacts of the project.

nple of comprehensive assessment of solar farm

Offsets Policy for Major Projects clearly states

ion of the policy will be compulsory but a more v technical issues, practical implementation issues

Framework for Biodiversity Assessment (FBA), he policy, the consent authority may vary the

ent with the above policy framework during the

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
	01	We have included reference to the Capital Solar Farm as an example of how the calculation of future site value has been informed by an appropriate technical study. By providing this information, we are not endorsing its application for the Darlington point Solar Farm assessment. OEH do not consider that the proponent has presented an ecologically sound basis for justifying a reduction in ecosystem credits, and consider that the full credit requirement is an appropriate offset for the proposal.	In addition, EPS is aware of and has contributed to FBA offset of Credit Calculator for renewable projects in NSW. These have be This was the basis for the original proposal for application of the that this method appropriately assessed the impacts of the project Policy, during the transitionary period.
	01.	 8.6 Application of credit discount to ecosystem credits Compensation for impacts to biodiversity Installation of the solar array and associated infrastructure is likely to result in a total sterilisation of the development footprint as foraging habitat for the Australian Bustard. A large bird such as this is unlikely to take off and land between and around individual panels in the solar array. A reduction in ecosystem credits does not provide a reasonable offset for the probable complete loss of Australian Bustard habitat within the development footprint. In addition to the consideration of threatened fauna habitat, the assessment presented in the BAR shows that the grassland is a native vegetation community in relatively good condition. Any reduction in condition needs to be adequately offset to compensate for the range of threatened species habitat provided by the proposal site. The Offset Plan developed for Capital Solar Farm mentioned above used the Biobanking Calculator (V2) to determine offsets for partial impact. The environmental assessment recognised that apart from changes to specific habitat threatened species, the ground vegetation would be affected by various altered microclimate and soil conditions (NGH 2010). The change in site condition was estimated using a more comprehensive assessment of impacts. The proponent commissioned a technical analysis that quantified the reduction in irradiation and these results were used to inform the future site values in mapped zones of partial impact. It is important to note that vegetation under the array at the Capital Solar Farm was less intact than at the Darlington Point proposal site. The offset strategy requires compensation if a comprehensive ecological program of monitoring floristic diversity and vegetation condition monitoring shows that loss to biodiversity values exceeds the credits provide by the offset for the probable complete loss of Australian Bustard habitat within the development	The updated BAR and Credit Calculation now incorporate the re- incorporating partial impacts within individual management zone Calculation assume full direct impacts except for the areas of pla calculated. Justification for calculation of partial impacts is provi The revised methodology does not apply any discount factors to have been entered into the site values in the calculator in accorda Australian Bustard in the species with the highest multiplier for a affected by the project and as such the calculated credit requirem habitat for this species (and the other ecosystem credits species w Despite this, the project is not expected to have a material impact issue No. 46 for further details.
	82.	Appendix 2 Flora species list	Noted. The updated BAR has been modified to address this com

outcomes that provide discounts outside of the een completed in association with OEH guidance. e adjustment outside of the calculator and we assert ct in accordance with the NSW Biodiversity Offset

ecommended approach by OEH for this project for ies. All management zones in the updated Credit ains grassland, in which partial impacts have been vided in Section 8 of the BAR.

the ecosystem credits generated as all impacts ance in the FBA methodology. It is noted that the a majority of the impacted management zones nent should provide appropriate compensatory with lower Tg values).

t on the Australian Bustard. Refer to response to

nment.

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
		Tables provided in Appendix 2 are difficult to interpret. Table headings need to be repeated on each page.	
Murrumbidgee Shire Council, 274719	83.	Murrumbidgee Council have met with and discussed the proposal with the developer, Edify Energy Pty Ltd and are in full support of the proposal proceeding with amendments outlined in the meeting and defined in the following.	Noted.
		Submission as outlined below.	
	84.	1. A safety fence be erected around the site prior to commissioning the site.	Noted. A safety perimeter fence is to be installed as part of the D practice, be undertaken very early in the delivery programme to r site. However, given the extent of the perimeter fence, this may n activities, such as road and laydown preparation, survey and set- complete well before commissioning.
	85.	 2. As all bulk deliveries are to be via Donald Ross Drive, Council will require details of the proposed road upgrade works and traffic management plan of the following areas: The entrance to the development on Donald Ross Drive Any emergency entry or exit points onto the road network from the site. 	Subsequent to the EIS, Edify Energy proposes that the principal r equipment deliveries to site will now be from Melbourne via Kid Drive. Melbourne has been confirmed as the preferred port of del solar farm plant and equipment, such as PV modules, piles and tr heavy vehicle traffic will be principally via this route where this of supplies such as aggregates and construction/potable water etc wo would not be significant volumes compared to bulk equipment de adequacy of the turn treatments at the Sturt Highway/Donald Ros
			The Donald Ross Drive access way into the DPSF site will be con Shire Council, and preliminary discussions have been held in this an 'early works package' prior to the main EPC contract. No othe in Section 3, Table 3 of this RTS report has been updated to indic to Council for review. This is also included as a mitigation measu Appendix C).
			With respect to sub-dot-point 2, the main emergency access point Drive. Edify Energy have commenced preliminary discussions w and will provide details of the design plans to Council for their re secondary emergency-only access at the north-east corner of the s Sturt Highway would only be used in the event of an emergency
	86.	3. Council and the developer have agreed to a contribution towards community infrastructure. A planning agreement is to be entered into between Council and Edify Energy Pty Ltd.	Noted. Edify Energy will work with Murrumbidgee Shire Counci However, the counter-party to the agreement shall be the project or similar), rather than Edify Energy Pty Ltd.

PSF project. Construction of this fence, will in maintain the safety, security and integrity of the not be fully complete before other construction out etc commence, but in any event, it will be

route for all EPC Contractor sourced bulk lman Way, then the Sturt Highway to Donald Ross livery for shipment of all EPC Contractor sourced racking systems, inverters and cables etc. All can be practicably managed. Locally sourced ould come from various directions but these eliveries. RMS has separately confirmed the ss Drive intersection.

nsistent with the requirements of Murrumbidgee s regard with a view to delivering these works as er road modifications are envisaged. Action TA1 cate that the site access design would be submitted ure in Section 5.4 of the revised TIA (refer

t to the DPSF site would be via Donald Ross ith Council with regards to these access points eview prior to construction commencing. A site via Tubbo Station internal access roads to the where the primary access point is obstructed.

il to further develop the planning agreement. special purpose vehicle (Darlington Point Pty Ltd

Agency and Submission No.	RTS Report Issue No.	Agency Comment	Proponent Response
	87.	4. Council is concerned that only above ground infrastructure will be removed. Council request that all above and below ground infrastructure be removed as part of the decommissioning of the site.	Acknowledged. Edify Energy will decommission the site to the s with industry standard for other solar farm proposals, Edify Ener only remove plant and equipment to a depth of 500 mm and recy will be left in place). Agricultural grazing uses of the land do not 0.5m and therefore remaining cables would not impact current of term soil contamination risk and removal of cables would disturb. In addition, with regard to the site control room, concrete slab fo on site, Edify Energy would undertake consultation with the land would be of value to the ongoing use of the land (possibly for ag consultation with the landowner prior to finalising decommission with the Secretary of DP&E.
	88.	5. Council are concerned about the location of the park and ride area. This was discussed with the developer who are now looking at a bus service. Council have no concerns with this change.	As noted in Edify Energy's response to RTS Report Issue No. 25 Council on 5 July 2018, a park and ride system is no longer prop mitigation measure has been removed (refer Section 3, Table 3, 7 instead discussed with Council the potential use of a bus service project that would transport workers from Griffith via Kidman W then via the Sturt Highway and onto Donald Ross Drive (interme DPSF would likely occur in Darlington Point township and/or at where practicable, operate outside of any specific school bus rou disruption to local traffic. This potential mitigation measure has 3 to new Action TA3 in this RTS report).

satisfaction of the Secretary of DP&E, and in line rgy will, unless the Secretary requires otherwise, to ycle (infrastructure at least 500 mm below ground at require turnover of soil to a depth of greater than or future grazing use. Cables do not pose a longb the native grassland.

or the BESS, gravel on access tracks and fencing downer as to whether the buildings and fences gricultural purposes). This would be agreed through ning. The site would be decommissioned as agreed

5, after discussions with Murrumbidgee Shire posed as part of the DPSF project and this Action TA3 of the RTS report). Edify Energy has exclusively for the construction phase of the Way, to Carrington Street in Darlington Point, and ediate pick-up locations between Griffith and t the Waddi Roadhouse). The bus service would, ate times on Donald Ross Drive to minimise been added to the proposal (refer Section 3, Table

3 Revised mitigation measures

In response to submissions received, this report proposes a number of changes to the mitigation measures detailed in the EIS. Table 3 provides the full list of mitigation measures with those amended highlighted in grey. New text is <u>underlined</u> and removed text shown with strikethrough. Table 3 provides the full list of mitigation measures as amended.

Table 3 groups mitigation measures by environmental element, numbers each mitigation measure and provides an indication of whether the mitigation measure would be implemented during construction (C), operation (O), or decommissioning (D).

No.	Recommended mitigation measures	С	0	D
Biodivers	sity			
B1	Prepare Biodiversity Management Plan based on the biodiversity management regime as outlined in the BAR CSU study and Section 7.1.3 <u>of the EIS</u> ('Recommended approach to biodiversity management') and Action B13 (see below) of this report, before commencement of construction. <u>This plan is to be</u> incorporated in the Construction Environmental Management <u>Plan.</u> This plan will encompass, but is not limited to: • Measures to be implemented for biodiversity			
	management, including protection of Vegetation and Heritage Protection Exclusion Zones and biodiversity management regime;	\checkmark	\checkmark	
	<u>Construction of the perimeter fence around the</u> <u>development site;</u>			
	• Seasonally-based program to monitor and report on the effectiveness of the measures;			
	 Responsibilities for implementation of the plan; and Plains Grassland monitoring – development of a monitoring plan in consultation with CSU. This should include further baseline surveys prior to construction. 			
B2	<u>Site workers to undertake</u> an environmental induction prior to commencement of on-site works. This induction will encompass ecologically important matters on site and the procedures to protect flora and fauna.	\checkmark		
B3	Sediment and erosion measures should be implemented in accordance with approved guidelines to control any potential sediment runoff (refer Table 74 of the EIS).	\checkmark		
B4	Vegetation and Heritage Protection Exclusion Zones and trees identified to be retained should be clearly marked (e.g. fencing) to ameliorate unnecessary impacts to vegetation.	\checkmark		
B5	Stockpiling and storage of materials and machinery will be avoided within the dripline (extent of foliage cover) of any native tree. of construction materials to be limited to existing cleared areas on-site	<u>√</u>		

Table 3Revised mitigation measures for the DPSF project

No.	Recommended mitigation measures	С	0	D
B6	Application of water to <u>roads and</u> stockpile <u>s where required to</u> <u>minimise dust generation</u> -areas during high wind to prevent air quality impacts.	<u>√</u>		
B7	A suitably qualified ecologist is to conduct pre-clearing surveys before removal of any native vegetation to remove any fauna and mark up hollow bearing trees to be removed. All trees proposed to be removed should be re-checked for hollows prior to clearing.	\checkmark		
B8	A suitably qualified ecologist will be required to be present during hollow-bearing tree removal to relocate any displaced fauna.	\checkmark		
B9	Where possible, dead wood, hollow trunks and tree limbs should be relocated to woodland areas not to be cleared.	\checkmark		
<u>B10</u>	Light vehicles should be restricted to existing internal roads to reduce impact upon injury and mortality to fauna. Injured fauna should be taken to the nearest vet for treatment.	\searrow		
<u>B11</u>	Ensure all equipment is free of plant material and soil that may contain weeds or soil borne diseases. This is particularly important for the spread of Bathurst Burr which was recorded within the development site.	V		
<u>B12</u>	With respect to potential injury and mortality to fauna during clearing, construction procedures should be implemented that reflect good industry practice.	V		
B1 <u>3</u> 0	Re-establishment of stabilised surfaces with native grass cover as soon as possible following construction.		\checkmark	\checkmark
B1 <u>4</u> 1	'Lake Effect' – monitor site for bird injury or mortality, with a search for carcasses under and around areas with solar panels.	\checkmark	\checkmark	
B1 <u>52</u>	The spread of noxious weeds should be managed (e.g. the invasive weed Bathurst Burr should be removed and be suitably disposed of offsite to reduce weed spread).	\checkmark	\checkmark	
B1 <u>6</u> 3	During the operational phase, the biodiversity management regime will focus on grazing and mowing that will reduce potential fuel load at times that are advantageous to native perennials and inhibiting exotic annual species. The following overarching biodiversity management regime is to be implemented:			
	• During winter graze sheep/mow: primarily this will reduce the level of dry matter from annual growing species for summer fire hazard. The annuals will tend to have a greater palatability/digestibility than the natives at this stage and be preferentially grazed.		\checkmark	
	• Remove sheep/mow mid-August: this will allow annual grass seed heads to emerge evenly.			
	• Mow to 5-10 cm mid September/October when annual grasses flowering: this will prevent seed set of exotic annual species enhancing native abundance as well as reducing combustible load.			

No.	Recommended mitigation measures	С	0	D
	• Destock/low stocking rate over summer: enhance seed set of perennial native species.			
	• Only mow/graze during fire season if grassland growth will result in average dry matter exceeding 5,000kg/ha DM: this value was taken from the Murrumbidgee Irrigation Area Bush Fire Management Committee in regard to the APZ fuel load in forested areas, in the absence of a defined fuel load for grassland in the RFS guidelines.			
	An adaptive management approach will be adopted whereby the management actions will be adjusted to optimise the grassland growth addressing on-site observations.			
B1 <u>7</u>	Implement the Biodiversity Offsets Package (BOP) recommendations as agreed with DP&E/OEH	\checkmark	\checkmark	\checkmark
<u>B18</u>	For under-panel microclimatic impacts, ensure that the adaptive management plan is implemented for the management of the native grassland under the solar panels.		⊻	
<u>B19</u>	Impacts for bushfire protection are to be mitigated by minimising the frequency of the slashing as necessary only based on the fuel load. Targeting the timing of slashing to reduce the impacts ensure the retention of native flora abundance and diversity.	>	<u>√</u>	
Traffic an	d access		-	
TA1	To enable the swept paths of a B-Double (as shown in Figure 14 and Figure 15 of the EIS) to adequately enter and exit the DPSF site, the site access would be upgraded during the initial stages of construction. This will be addressed during the detailed design phase of the project and included in the construction Traffic Management Plan. The design will be submitted to <u>Murrumbidgee Shire Council for review prior to</u> <u>commencement of construction</u> .	\checkmark		
TA2	A construction Traffic Management Plan will be developed for the project <u>by the EPC Contractor</u> and <u>would be finalised in</u> <u>consultation with the relevant road authorities (e.g. Roads and</u> <u>Maritime and Murrumbidgee Council)</u> and implemented during construction. <u>The appointed transport contractor shall be</u> <u>involved in the preparation of this plan. The plan shall address</u> <u>all light and heavy traffic generation to the development site and</u> <u>detail the potential impacts associated with the development, the</u> <u>mitigation measures to be implemented, and the procedures to</u> <u>monitor and ensure compliance. Wherever practicable,</u> <u>additional traffic beyond the average of 50 heavy vehicles per</u> <u>day will be scheduled outside of peak hour. This plan shall</u> <u>address, but not necessarily be limited to the following:</u> <u>i) Finalise details of haulage, including transport routes,</u> <u>volumes, vehicle type and length, timing, and frequency,</u>	\checkmark		

No.	Recommended mitigation measures	С	0	D
	ii) Finalise details of any required road-specific mitigation			
	measures.			
	iii) Require that all vehicular access to the site be via the			
	approved access routes.			
	iv) Details of measures to be employed to ensure safety of			
	road users and minimise potential conflict with project			
	generated traffic.			
	v) Proposed hours for construction activities, as night time			
	construction presents additional traffic related issues to be			
	considered.			
	vi) 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			
	works site is to include strategies and measures employed to			
	manage the risks of driver fatigue and driver behaviour.			
	viii) Maaguraa ta address advarsa alimatia aanditiana that			
	with measures to address adverse crimatic conditions that may affect road safety for vehicles used during construction			
	operation and decommissioning of the facility (e.g. fog. dust.			
	wet weather).			
	viii) procedures for informing the public where any road			
	access will be restricted as a result of the project,			
	ix) any proposed precautionary measures such as signage to			
	warn road users such as motorists about the construction			
	activities for the project,			
	x) a Driver Code of Conduct to address such items as;			
	appropriate driver behaviour including adherence to all			
	traffic regulations and speed limits, safe overtaking and			
	maintaining appropriate distances between vehicles, etc and			
	appropriate penames for intringements of the Code,			
	xi) details of procedures for receiving and addressing			
	complaints from the community concerning traffic issues			
	associated with truck movements to and from the site.			
TA3	Edify Energy propose to use a park and ride system to transport			
	construction workers to and from the site. A number of options			
	are currently being assessed by Edity Energy to use a parking			
	Contractor would be responsible for operating the transport			
	mode (e.g. bus charter) to and from the site during construction	\checkmark		
	of the DPSF.			
	Edify Energy will develop the traffic management plan for			
	approval by the relevant authorities that will consider the use of			
	a bus service for workers, rather than a park and ride facility, for			

No.	Recommended mitigation measures	С	0	D
	the construction phase of the project. This would minimise the number of light vehicles accessing the site.			
<u>TA4</u>	A Road Dilapidation Report for the road from the DPSF site along Donald Ross Drive to its intersection with Sturt Highway would be undertaken by the contractor prior to construction.	✓		
<u>TA5</u>	In the event of glint or glare from the solar plant being demonstrated to be evident from a public road (e.g. Donald Ross Drive), glare mitigation measures such as construction of a barrier (e.g. vegetation or fence) or other approved device to remove any nuisance, distraction and/or hazard caused as a result of glare from the solar panels, would be implemented.	√	✓	
Flooding	and hydrology			
FH1	In the event of a flood event during construction, it would be anticipated that construction work would cease until it is determined safe to resume work at the site.	\checkmark		
FH2	An Emergency Response Plan for the site shall include measures of what to do in the event of flood (eg cease work and recommence once it is safe to do so).	\checkmark	\checkmark	\checkmark
Aborigina	al cultural heritage		1	
ACH1	 <u>The</u> Aboriginal Heritage Management Policy will apply to the site <u>during</u> construction to allow for the management and conservation of Aboriginal heritage in relation to salvage activities and construction activities. The following measures apply as part of the Management Policy: The proponent will <u>use reasonable endeavours to ensure all of its employees</u>, contractors and subcontractors and agents are made aware of and comply with this Aboriginal Heritage Management Policy. The proponent <u>or its EPC Contractor</u> will appoint a suitably qualified and experienced environmental manager who is responsible for overseeing the activities related to the Aboriginal Heritage Management Policy. The proponent <u>or its EPC Contractor</u> will appoint a suitably qualified and experienced archaeologist who is responsible for overseeing, for and on behalf of the proponent, the collection of archaeological <u>artefacts-activities</u> relating to the project. 	√		
	• Where the surface collection of artefacts has been nominated for the impacted site, no construction activities (or fencing, geotechnical investigations, minor clearing, establishing site compounds, adjustment to services/utilities etc) can occur on the lands to be investigated until the relevant surface collection at the nominated site (i.e. Tubbo AFT 01) has been completed.			

No.	Recommended mitigation measures	С	0	D
	• Prior to the commencement of early works activities (eg fencing, minor clearing, establishing site compounds etc), the Contractor will prepare a construction heritage site map identifying the Aboriginal site requiring the collection of surface artefacts and the Aboriginal sites to be avoided (for all sites in proximity to the project boundary). The Contractor's construction heritage site map should be prepared to the satisfaction of Edify Energy.			
	• All employees, contractors, subcontractors and agents carrying out early works activities will undertake a Project induction (including the distribution of a construction heritage site map) to ensure that they have an understanding and are aware of the Aboriginal heritage issues affecting the activity.			
	• Opportunity must be provided to the Griffith Local Aboriginal Land Council to assist with the surface collection of Tubbo AFT 01.			
	• During the surface collection process, the DP&E, as the approval authority, will be consulted. Recovered Aboriginal objects will be transferred in accordance with a Care Agreement or similar agreement to the Griffith Local Aboriginal Land Council.			
	• A written archaeological report documenting the salvage collection must be provided to Edify Energy within a reasonable time in accordance with the Project Approval following the completion of the archaeological program.			
	• The Aboriginal Heritage Management Policy does not authorise any damage of human remains. The project approval through the CHAR process does not include the destruction of Aboriginal remains. If potential human remains are to be disturbed, the proponent must follow the procedures listed under Item ACH2 below.			
ACH2	In accordance with the <i>Skeletal Remains – Guidelines for the</i> <i>Management of Human Skeletal Remains under the</i> Heritage Act 1977 (NSW Heritage Office, 1998) and the <i>Aboriginal</i> <i>Cultural Heritage Standards and Guidelines Kit</i> (NPWS, 1997), should the construction activities reveal possible human skeletal material (remains), the following procedure is to be followed:			
	• As soon as remains are exposed, all work is to halt at that location (e.g. within 100m of the find) immediately and the Project environmental manager on site is to be immediately notified to allow assessment and management:	\checkmark		
	(i) Stop all activities <u>within 100m of the find;</u> and			
	 (ii) Secure the <u>find</u> site. Contact police, the discovery of human remains 			
	• Contact ponce, the discovery of numan remains triggers a process which assumes that they are			

No.	Recommended mitigation measures	С	0	D
	associated with a crime. The NSW Police retain carriage of the process until such time as the remains are confirmed to be Aboriginal or historic			
	• DP&E, as the approval authority, will be notified when human remains are found			
	 Once the police process is complete and if remains are not associated with a contemporary crime, contact DP&E. DP&E will determine the process, in consultation with OEH and/or the Heritage Office as appropriate: 			
	 (i) If the remains are identified as Aboriginal, the site is to be secured and DP&E and all Aboriginal stakeholders are to be notified in writing according to DP&E instructions; or 			
	 (ii) If the remains are identified as non-Aboriginal (historical) remains, the site is to be secured and the DP&E is to be contacted. DP&E will act in consultation with the Heritage Division as appropriate. The Heritage Division will be notified in writing according to DP&E instructions. 			
	• Once the NSW Police process is complete and if the remains are identified as not being human, work can recommence once the appropriate clearances have been given.			
ACH3	Incident reporting requirements in accordance with the Project Approval is to include Aboriginal heritage.	\checkmark		
ACH4	During construction, project design alterations or other changes to the Approved Project may be required (such as an alteration of the current design, the location of ancillary facilities) within the project corridor may result in a reduced or increased impact to Aboriginal cultural heritage. Any change in the overall impact on Aboriginal cultural heritage would need to be assessed to determine consistency in consultation with an archaeologist, with continued involvement of the Aboriginal stakeholders.			
	 If a proposed change to the Approved Project is considered to have a neutral or lesser significant impact on Aboriginal cultural heritage than that identified in this document, it would be a consistent impact. If the proposed change is considered to be consistent with the Approved Project, Edify Energy may approve the change with no requirements to seek further approval. However, in certain circumstances, further consultation with Aboriginal stakeholders may still be required. 	√		
	2. If a proposed change to the Approved Project is considered to have a more significant impact on			

No.	Recommended mitigation measures	С	0	D
	Aboriginal cultural heritage than as detailed in the Project Approval, it would be considered an inconsistent impact and would require an amendment to the mitigation measures. This would require a modification of the Approved Project and further consultation with Aboriginal stakeholders.			
ACH5	The extent to which Edify Energy will continue to consult with Aboriginal stakeholders is dependent on the level of impact:			
	 Reduced or neutral impact: if as a result of alterations to the project design a previously identified impact to an Aboriginal heritage item is reduced or neutral, then no further consultation is required. If as a result of alterations to the project design an impact to an Aboriginal heritage item is proposed that results in a reduced impact on the overall heritage significance of the project area, then further consultation with Aboriginal stakeholders will be undertaken. This consultation may entail a phone call and phone log of comments received or the provision of a report for comment (10 working days). 			
	2. Increased impact: Where as a result of alterations to the project design an impact on Aboriginal heritage is considered to be greater than identified by the Approved Project, further consultation will be undertaken. This consultation will either entail a phone call and phone log of comments received or the provision of a report for comment (10 working days).	\checkmark		
	3. Unknown impacts: Where a proposed change is an area located outside the project boundary assessed as part of the Approved Project, the impact on Aboriginal cultural heritage is considered to be unknown. This area would require preliminary assessment to determine any impacts upon Aboriginal heritage. Should no impacts be identified then no consultation with Aboriginal stakeholders is required. Should potential impacts be identified, consultation with Aboriginal stakeholders will be undertaken. This consultation will entail the provision of a report for stakeholder comment (10 working days) detailing the impacts and mitigation strategies proposed.			

No.	Recommended mitigation measures	С	0	D
ACH6	Should an unexpected archaeological <u>or Aboriginal</u> find be made during construction, the following procedures will be adopted:			
	• As soon as found, all work is to halt at that location (e.g. within 100m of the find) immediately and the Project environmental manager on site is to be immediately notified to allow assessment and management:			
	(i) Stop all activities <u>within 100m of the find;</u> and			
	 (ii) Secure the <u>find</u> site. Consult with project archaeologist and DP&E on proposed actions, to determine if the find is consistent with the <u>Project Approval:</u> <u>- If the find is consistent, the archaeologist will allow</u> 	√		
	 work to continue If the find is inconsistent, OEH will be notified as soon as practical on 131 555 providing any details of the Aboriginal object and its location 			
	• <u>Not recommence any work in the particular location unless</u> <u>authorised in writing by the OEH,</u>			
	• If skeletal human remains are unexpectedly encountered during the activity, work must stop immediately within the immediate vicinity of the find (within 100m of the find), the area secured to prevent unauthorised access and NSW Police and OEH contacted.			
ACH7	Under Section 89A of the <i>National Parks and Wildlife Act 1975</i> , OEH will be notified on the discovery of Aboriginal objects. This includes:			
	• Aboriginal site recording forms submitted to AHIMS for any newly identified Aboriginal object(s) through the course of the project;			
	• Aboriginal Site Impact Recording Forms (ASIRFs) submitted to AHIMS for each site impacted. On collection of the surface artefacts by Griffith Local Aboriginal Land Council at Tubbo AFT 01/AHIMS 49-5-1052, an ASIRF would need to be completed and lodged with OEH within a reasonable time after the collection has been completed.	⊻		
	• <u>Reporting to the OEH on the discovery of human remains.</u>			
Land con	npatibility			
LU1	Regular and ongoing consultation with adjacent landholders would be undertaken to manage land use interactions between the solar farm and adjacent properties.	\checkmark	\checkmark	\checkmark

No.	Recommended mitigation measures	С	0	D
LU2	Consultation would be undertaken with TransGrid regarding connection to the substation and design of electricity transmission infrastructure.	\checkmark		
LU3	Prepare a pest and weed management plan to manage the occurrence of noxious weeds and pest species across the site during construction and operation. The plans must be prepared in accordance with Murrumbidgee Council and NSW DPI requirements. Where possible, integrate weed and pest management with adjoining landowners. The plan shall include restricting vehicle and machinery movements to formed access tracks and implementing wash-down procedures for vehicles entering and exiting the site.	\checkmark	√	
LU4	A Bushfire Management Plan will be prepared for the project to be implemented during construction, operation and decommissioning (refer to Section 8.11 of the EIS for further information on potential bushfire risk).	\checkmark	\checkmark	\checkmark
LU5	A Traffic Management Plan would be implemented during construction, operation and decommissioning (refer to Section 7.2 of the EIS for further information on traffic and access).	\checkmark	\checkmark	\checkmark
LU6	A Noise and Vibration Management sub-plan to the Construction Environmental Management Plan (CEMP) will be prepared to manage any potential impacts to surrounding land uses (refer to Section 8.2 of the EIS for further information on noise and vibration management).	\checkmark		
LU7	A Soil and Water Use Management Plan, Erosion and Sediment Control Plan and dust suppression measures will be prepared to manage any potential impacts to surrounding lands (refer to Section 8.4, 8.5 and 8.6 of the EIS for further information). The SWMP would be prepared as part of the Construction Environmental Management Plan, prior to commencement of activities.	\checkmark	~	
LU8	 A Rehabilitation and Decommissioning Management Plan is to be prepared in consultation with NSW Department of Primary Industries and the landowner prior to the commencement of decommissioning. The Rehabilitation and Decommissioning Management Plan is to include: The design criteria of the final landuse and landform and the indicators to use to guide land back to 			~
	agricultural production and a timeline for the rehabilitation program.Potential mitigation and monitoring measures to be			
	adopted for rehabilitation remedial actions.Identification of any land <u>that can be returned to</u>			
	current grazing land use. with a cropping history or			

No.	Recommended mitigation measures	С	0	D
	land with a capability for cropping, so that should a <u>A</u> ny cables/pipes buried at a depth of >500mm will			
	remain.			
Non-Abo	riginal cultural heritage		1	1
NA1	Should any object or item of non-Aboriginal cultural heritage be discovered during construction, the following actions would be undertaken:			
	• The object or item must not be removed or disturbed.			
	• All work at the find location must cease and the item cordoned off.	\checkmark		
	• The Heritage Division (OEH) would be notified of the find for advice if needed, prior to further work being carried out			
	in the vicinity.			
Noise and	vibration			
NV1	Construction works should be undertaken during standard working hours only.			
	• Monday – Friday 7am to 6pm			
	• Saturday – 7am to 1pm			
	In general, no construction activities will occur over night, on Sundays or public holidays, however exceptions to these hours may be required on limited occasions; for example:			
	• The delivery of materials as requested by the NSW Police Force or other authorities for safety reasons and/or to minimise disruption to local traffic;			
	• Augmentation works to the TransGrid substation, which may require a temporary power outage, such that the impact on power supplies to the local community is minimised; and	\checkmark	√	\checkmark
	• Emergency work to avoid the loss of life, property and/or material harm to the environment.			
	The local council, surrounding landholders and other relevant authorities will be notified of any exceptions prior to the works being undertaken.			
	Daily operations and maintenance activities by site staff would be undertaken during standard working hours of:			
	• Monday – Friday 7am to 6pm			
	• Saturday – 8am to 1pm			
	Outside of emergencies or major asset inspection or maintenance programs, night works and work on Sundays and public holidays would be minimised.			
NV2	The appointed contractor would develop and implement a Construction Noise and Vibration Management Plan (CNVMP),	\checkmark		4

Edify Energy

No.	Recommended mitigation measures	С	0	D
	which is a sub-set of the CEMP, which may consider the			
	following: that should include, but not be limited to the			
	Iollowing :			
	 Adherence to the standard approved working hours for construction projects 			
	Consider the use of noise barriers located in such a way as to minimise noise exposure where possible through screening construction activities either through natural screening or use of site sheds and other temporary structures where possible			
	• Using natural screening by topography wherever possible to reduce noise impacts			
	• Using site sheds and other temporary structures or screens to limit noise exposure where possible			
	 Installing operational noise barriers as early as possible to provide ongoing screening from construction activities, where possible. 			
	• The appropriate choice of low-noise construction equipment and/or methods.			
	• <u>Schedule noisy activities at less noise-sensitive times of day</u>			
	• Modifications to construction equipment or the construction methodology or programme. This may entail programming activities to occur concurrently where a noisy activity will mask a less noisy activity, or, at different times where more than one noisy activity will significantly increase the noise. The programming should also consider the location of the activities due to occur concurrently.			
	• Restricting or redirecting movements to reduce flows during peak times.			
	• Community engagement notification and noise monitoring at sensitive receivers, community information programme and a complaints hotline. Maintain open communication channels with nearby receivers, including commercial tenants and residents.			
	• Regularly train workers and contractors (such as at toolbox talks) to use equipment in ways to minimise noise			
	• Site managers to periodically check the site and nearby residences for noise problems so that solutions can be quickly applied.			
	• Avoid the use of radios or stereos outdoors and the overuse of public address systems.			
	• Avoid shouting and minimise talking loudly and slamming vehicle doors.			
	• Turn off all plant and equipment when not in use.			

No.	Recommended mitigation measures	С	0	D
NV3	 If a vibration complaint is received, engage with the complainant in accordance with established community engagement procedures (refer Action NV2 above) to discuss potential mitigation measures. The application of suggested EIS noise and vibration mitigation measures would be considered depending on the nature of the complaint. To reduce the effect on residents of piling noise, nearby residents should be consulted regarding the intended activities associated with the piling process. Should percussive piling be considered, activities to reduce the impact of this activity include: Use a resilient pad (dolly) between pile and hammer head. Enclosing the hammer head in a temporary acoustic shroud. Rotary bored or vibro piling may be used where consistent with the type of pile used and restrictions on soil disturbance. Piling should not be undertaken outside of standard working hours. 	\checkmark		
NV4	The site Environment Manager would be responsible for undertaking construction noise monitoring. Appoint a construction staff member responsible for construction noise and vibration management on site. Undertake construction noise monitoring to alert the contractor of potential exceedances of noise management levels.	~		¥
NV5	Locate noisy equipment as far away as possible from sensitive receivers wherever possible. The location of stationary plant (air compressors, generators, etc) is to be as far away as possible from sensitive receivers.	\checkmark	\checkmark	~
NV6	Comply with appropriate noise guidelines during construction. Apply the TfNSW Construction Noise Strategy's maximum allowable noise levels for construction equipment to screen machinery adopted for use on site by the construction contractor.	~		
NV7	Maintain minimum working distances for vibration intensive plant where possible. Where this is not possible, vibration monitoring with real time alerts should be considered.	\checkmark		
NV8	 To manage construction related traffic noise, implement the following measures may include the following: Seek to schedule vehicle routing and movements in order to minimise the impact of road traffic noise within a given period i.e. allow for arrival of workers and equipment deliveries to occur over a longer period to reduce the noise emissions during peak periods. 	√		

No.	Recommended mitigation measures	С	0	D
	• Seek to limit speeds on site during construction and the use of compression brakes when accessing the main site <u>entrance</u> Reduce the impact of the use of compression brakes when accessing the site, management of speed to allow for minimal use of compression breaking when accessing the site.			
	• <u>Seek to turn off vehicles when not in use-Ensure vehicles</u> are adequately silenced and specified for site use. Selection of transport units should be undertaken with the thought to reduce noise emissions.			
	• <u>As per Action NV2, implement community engagement</u> <u>measures as needed.</u> <u>Ongoing consultation with closest</u> sensitive receivers on Donald Ross Drive. Agree acoustic treatments or management measures if construction noise exceeds criteria at these locations.			
	• Considerations for the duration and timing of traffic should be made with community consultation to act in the best interests of the affected receivers. Given the temporary nature of construction, the duration and intensity of works should be determined to best suit the affected receivers.			
Visual an	nenity			
VA1	As part of the detailed design, the materials and colour of the site 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, which may include: including:			
	• <u>Non-reflective pole mounts-will be non reflective</u>	\checkmark	\checkmark	
	• <u>Non-reflective s</u> ecurity fencing posts and wire would be non-reflective	·	·	
	• Screening vegetation and landscaping options <u>would will</u> be considered and agreed with adjacent landowners and in discussion with Murrumbidgee Council if required.			
VA2	Dust will be controlled (with the application of mitigation measures detailed in Table 76 of the EIS) in response to visual cues.	\checkmark		\checkmark
VA3	Night lighting would be minimised to the maximum extent possible (i.e. manually operated safety lighting at the main component locations). It would be directed away from <u>Donald</u> <u>Ross Drive Kidman Way</u> , so as not to cause light spill that may be hazardous to drivers.	\checkmark	\checkmark	\checkmark
VA4	Areas of soils disturbed by the project would be rehabilitated progressively or immediately post-construction and decommissioning, reducing views of bare soil.	\checkmark		\checkmark

No.	Recommended mitigation measures	С	0	D
Soils and	geology			
SOIS and	 A Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) would be prepared, implemented and monitored during the construction and decommissioning of the proposed site in accordance with the <i>Managing Urban</i> <i>Stormwater: Soils and Construction, volume 1, 4th edition</i> (Landcom, 2014) <u>under the CEMP</u> covering items such as: Primary erosion and sediment controls shall be installed prior to any site disturbance, vegetation clearance or service installation eg sediment fences etc. Regularly inspect erosion and sediment controls, particularly following storm and rainfall events Maintain an inspection register that records monitoring data on the effectiveness of the ESCP, and maintenance record of the erosion and sediment capture measures. Ensure that machinery arrives on site in a clean, washed condition and is in good working order (to avoid fluid leaks). Any machinery leaving site is to be visually checked before leaving the site to ensure it is in a clean condition to avoid tracking of sediment onto public roads. For 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 	√		√
	 In areas of disturbed soil, the site would be progressively. 			
	rehabilitated as soon as possible after completing works.			
SO2	Prior to commencing construction <u>and decommissioning</u> <u>activities</u> , soil testing <u>and survey guided by the <i>Australian Soil</i> <u>and Land Survey Handbook (CSIRO, 2009)</u> is to be undertaken to determine the clay content, EC and ECC of the soils. This will assist in determining the required gypsum application rates for the purposes of cable trenching in potentially sodic soils (to prevent tunnel erosion) and for rehabilitation purposes during decommissioning.</u>	\checkmark		⊻
SO3	If a potential contamination risk is identified during construction, measures outlined in the CEMP will be adopted such as undertaking a detailed site investigation to characterise the soil before taking further action.	\checkmark		
SO4	To minimise dust generation in disturbed areas during construction and operation, the following measures <u>may</u> <u>include:</u> are recommended:	\checkmark	\checkmark	

No.	Recommended mitigation measures	С	0	D
	• Use of dust suppression (eg dampening of soils, or use of dust suppression chemical)			
	 Scheduling of works to avoid wet weather where possible outside the summer period (to avoid wet weather) 			
	• <u>Limit Manage</u> construction activity to localised areas on the site, <u>such as reducing Restricting</u> vehicle movements and speeds on site during dry and windy conditions, <u>unless the aforementioned dust suppression measures allow otherwise</u> .			
SO5	During construction, operation and decommissioning, dust would be managed to prevent dust leaving the proposed site.	\checkmark	\checkmark	\checkmark
SO6	A Spill Response Plan would be developed and implemented during construction, operation and decommissioning that would cover:			
	• Activities with the potential for spills (refuelling) would not be undertaken within 50 m of any farm dams and an adequately stocked spill response and containment kit will be available on site.	/	1	1
	• Appropriately store, handle and use any potential hazardous materials (eg fuel) in accordance with the <i>Code of Practice for Storage and Handling of Dangerous Goods</i> (WorkCover NSW, 2005).	V	V	V
	• Mitigate the effects of soil contamination by fuels or other chemicals (including emergency response and EPA notification procedures and remediation).			
SO7	A vegetation and land management plan will be developed for the site and will include considerations to address soil erosion. The plan would include monitoring and triggers for action to address issues arising from erosion that develops during operation.		\checkmark	
Air quali	ty		L	
AQ1	Development and implementation of a management system to respond promptly to any air quality related complaints.	\checkmark	\checkmark	\checkmark
AQ2	During construction, operation and decommissioning, dust would be managed to prevent dust leaving the proposal area. This includes dust from stockpiled materials. Dust would be managed through the CEMP that may include measures such as: The CEMP will seek to minimise and control dust emissions generated from construction equipment including consideration of measures such as:			
	• <u>Potential u</u> se of a water cart (truck) to wet uncovered areas, including access tracks, as appropriate to the conditions of the site.	\checkmark	\checkmark	\checkmark
	• Stabilisation of any disturbed areas that expose soils and increase erosion risks, including covering of stockpiles (eg placement of artificial covers or revegetate with grass species) and minimising the heights of stockpiles as far as possible.			

No.	Recommended mitigation measures	С	0	D
	• <u>Potential to use-Include</u> a washdown and/or shakedown station at the entrance to the proposed site to enable sediment to fall-off trucks that are moving from unsealed areas to sealed roads off-site.			
	• Investigate the <u>potential to</u> use of fuel-efficient machinery and vehicles (that generate) low carbon emissions for onsite use.			
	• <u>Potential to r</u> estrict vehicle movements and ground disturbance to the minimum area that is safely practicable.			
	• <u>Potential to temporarily cease Temporary cessation of</u> some works during excessively dry and windy conditions.			
AQ3	Development of protocols to minimise and control dust emissions from construction equipment, vehicles and general operations would be included in the construction, operation, and decommissioning environmental management plans. Measures are to be developed in accordance with Australian Standards and POEO Act requirements.	\checkmark	\checkmark	\checkmark
Water qu	ıality			1
WQ1	Prior to works commencing, a CEMP will be prepared that will include a soil and water sub-plan that details the erosion and sediment controls that will be employed throughout the construction phase. These measures will be in accordance with the provisions of <i>Managing Urban Stormwater: Soils and Construction</i> , volume 1, 4 th edition (Landcom, 2014).	~		
WQ2	Place fuel and chemical tanks/containers in locations at least 50 m away from drainage lines and any farm dams that are retained on site. Refuelling activities will be undertaken in impervious bunded areas and will not be undertaken within 50 m of drainage lines and farm dams. An adequately stocked spill response and containment kit will be available on site.	\checkmark	~	√
WQ3	All staff shall be trained in spill management-through toolbox talks	\checkmark	\checkmark	\checkmark
WQ4	Vehicles shall be maintained according to manufacturer's specifications , with daily checks to ensure fuel, chemical and oil leaks are minimised	\checkmark		\checkmark
WQ5	Inclusion of incident management measures in the CEMP and the Operational Environmental Management Plan (OEMP), including the requirement to notify EPA for incidents that cause material harm to the environment (as per s147-153 of the <i>Protection of the Environment Operations Act 1997</i>).	\checkmark	~	
WQ6	Provide suitable and secured temporary and permanent site facilities to prevent any direct discharge of sewerage to drainage lines. It is expected that the Contractor will arrange a	\checkmark	\checkmark	

No.	Recommended mitigation measures	С	0	D
	dry or septic system for use during construction. Operational site facilities will use a septic system.			
WQ7	Prior to DPSF operations, a Vegetation and Land Management Plan will be implemented with procedures to maintain a groundcover across the site to minimise soil disturbance, whilst managing the fuel load for minimising bushfire risk. A combination of mechanical slashing and grazing will require monitoring and implementation of adaptive management principles.		\checkmark	
<u>WQ8</u>	Obtain water from commercially available sources in the local area (e.g. Coleambally or Murrumbidgee Irrigation areas) and sourced via truck delivery to site. Potable water for construction and operation will be supplied for staff via truck delivery and stored in onsite tanks for reticulation to amenities.	<u> </u>	<u>√</u>	
<u>WQ9</u>	For any farm dams that will be filled in, water shall be drained from the dam for use on site for dust suppression and civil works during the construction phase. The dam would be filled in and levelled with adequate engineering assessment undertaken to ensure that the methodology includes appropriate grade of fill and compaction to ensure stability of the rehabilitated area.	<u>√</u>		
Resource	use and waste			
WA1	 A Waste Management Plan (WMP) will be developed and implemented during construction, operation and decommissioning. It would include but not be limited to: Application of the waste hierarchy by identifying opportunities to avoid, reuse and recycle as much as possible during all phases of the project 			
	 Topsoil from disturbed areas will be stored for use in future rehabilitation activities onsite 			
	• Recovering or recycling materials for reuse or a secondary purpose			
	• Provision for recycling management onsite	\checkmark	\checkmark	\checkmark
	• Appropriate requirements for hauling of wastes (such as covered loads)			
	• Disposal of waste at licenced facilities			
	• The Contractor would be responsible for toilet facilities onsite during construction, which would either be a dry or septic system. There would be no direct discharge of sewage.			
	• A septic system will be used during operation with no direct discharge of sewage			

No.	Recommended mitigation measures	С	0	D
	Provide adequate disposal facilities for all types of construction and decommissioning waste			
	• Conduct routine checks for litter and rubbish along access tracks and roads and remove to appropriate disposal facilities			
WA2	The WMP shall include a tracking system for all waste leaving the site, identifying the waste classification, quantities and materials to be recycled or disposed of.	\checkmark	\checkmark	\checkmark
WA3	In the event of a spill, appropriate spill management response will be undertaken such as:Contain the spill			
	 Use an adequately stocked spill kit (with <u>a number of</u> <u>appropriately trained staff being available on site to address</u> <u>spills</u>)-all onsite staff being appropriately trained in its use) <u>Appropriate Emergency</u> response systems implemented 	\checkmark	\checkmark	\checkmark
	• Contaminated spill material would be removed offsite by a licenced contractor			
Socio-eco	onomic			
SE1	Community Consultation Plan that will address (but not be limited to) the following activities:			
	 Opdating the community above the progress of the proposal Informing relevant stakeholders of potential impacts (air quality, noise, traffic issues etc.) 	\checkmark	\checkmark	
	Complaints register and response method			
SE2	The Contractor would liaise with local industry representatives to maximise the use of local contractors, materials etc. wherever possible and provide training programs where required.	\checkmark		\checkmark
SE3	The Contractor would liaise with Murrumbidgee Council and local accommodation providers about accommodation options for staff to minimise the impact on the existing services.	\checkmark		\checkmark
SE4	The Contractor would liaise with Murrumbidgee Council regarding any local festivals to manage any potential timing conflicts with local events and seasonal workforce periods.	\checkmark		\checkmark
SE5	A Decommissioning Management Plan (DEMP) would be developed prior to undertaking decommissioning activities that would cover potential impacts such as noise, dust, and traffic management.			\checkmark

No.	Recommended mitigation measures	С	0	D
Hazardo	us materials			
HM1	The Darlington Point Solar Farm would manage the fire risks associated with the BESS by:			
	• Installing reliable, automated monitoring and control systems, with alarm and shutdown response capability.			
	• Taking reasonable and safe measures to <u>minimise prevent</u> the risks of external <u>bushfire impacts to the facility in</u> <u>accordance with the Bushfire Management Plan.</u> heat effects in the event of a bushfire.			
	• <u>Applying Designing</u> appropriate separation and isolation between battery cubicles, and between the BESS and other infrastructure, in accordance with the manufacturers recommendations, <u>including vegetation exclusion areas</u> <u>around the facility to reduce fire risk in accordance with the</u> <u>Bushfire Management Plan and including gravel set off</u> <u>areas around the facility</u> .	V	V	
	• Compliance with all-relevant Australian codes and standards and/or international standards as may be appropriate.			
	• Preparation of a BESS-specific fire response plan, in conjunction with the NSW Rural Fire Service.			
	• Installing adequate supplies of <u>tank stored</u> firefighting water <u>storage</u> within close proximity to the BESS facility if required by the BESS-specific fire response plan.			
HM2	Fuels and pesticides/herbicides in use at the site will be stored at the laydown area in appropriately bunded areas designed in accordance with AS1940-2004.	\checkmark	\checkmark	
Electro-n	nagnetic fields			
EM1	All designs shall be in accordance with the <i>Guidelines for</i> <i>limiting exposure to Timevarying Electric, Magnetic and</i> <i>Electromagnetic Fields</i> (ICNIRP, 1998) & (ICNIRP, 2010b) and relevant codes and industry best practice standards in Australia.	\checkmark	√	
EM2	The security system for the site, including safety fencing and closure of gates, shall be maintained throughout the construction and operation, to provide safe exposure distances to the public.	\checkmark	\checkmark	\checkmark
Bushfire	risk			
BR1	A Bushfire Management Plan will be prepared for the DPSF covering construction, operations and decommissioning with input from RFS <u>MIA Fire Control Centre</u> , and include but not be limited to:	\checkmark	\checkmark	\checkmark

No.	Recommended mitigation measures	С	0	D
	• Complying with the requirements of <i>Planning for Bush Fire</i> <i>Protection 2006</i> and the NSW Rural Fire Service's <u>document 'Standards for Asset Protection Zones'</u> including:			
	- Identifying asset protection zones			
	- Providing adequate egress/access to the site			
	- Emergency evacuation measures			
	• <u>24-hour emergency contact details including alternative</u> <u>telephone contact</u>			
	• <u>Site infrastructure plan, fire-fighting water supply plan, site</u> access and internal road plan, locations of hazards (physical, chemical and electrical) that will impact on fire- fighting operations and procedures to manage identified hazards during fire-fighting operations and any such additional matters as required by the NSW RFS District Office (plan review and updates).			
	• Adequate setbacks included in the design (eg 20m 10m from fenceline before commencement of solar arrays, and 20m 10m setback from wooded areas and 'Vegetation and Heritage Protection Exclusion Zones').			
	• Management of site activities with a risk of fire ignition, including all vehicle and plant movements beyond formed roads and trafficable hard stand areas-will be restricted to diesel, not petrol vehicles			
	• Storage and maintenance of firefighting equipment, including ensuring fire extinguishers are available in all site vehicles			
	• Daily monitoring of the bushfire status through the RFS website (<u>http://www.rfs.nsw.gov.au</u>) during the bushfire season and communicate to site personnel			
	• Should any fuel or flammable liquids be stored on-site, this material would be stored in a designated area and will be sign-posted 'Fuel Storage Area'. A register will be maintained that confirms the quantities and location of any flammable material stored on-site along with the applicable Material Safety Data Sheet (MSDS).			
	• Controlled burning of vegetation may be undertaken on site in accordance with appropriate regulatory requirements, only if weather conditions are considered optimal (or for weed management purposes to minimise weed transport to neighbouring properties).			
	• Bushfire management regime for grass land management within the APZ			
	• Provision of multiple water tanks across the site. <u>A</u> 20,000 litre water supply tank fitted with a 65mm storz			

No.	Recommended mitigation measures	С	0	D
	 <u>fitting shall be located adjoining the internal access road</u> within the required APZ. Operational procedures relating to mitigation and suppression of bushfire relevant to the solar farm. 			
BR2	The development site is to be managed as an Asset ProtectionZone (APZ) as outlined within Section 4.1.3 and Appendix 5 ofthe 'Planning for Bush Fire Protection 2006' and the NSWRural Fire Service's document 'Standards for Asset ProtectionZones'.Prior to solar farm operations, a biodiversity managementregime as part of the Biodiversity Management Plan will bedeveloped with procedures to maintain a groundcover acrossthe site, whilst managing the fuel load for minimising bushfirerisk. A combination of mechanical slashing and grazing will beundertaken and will require monitoring and implementation ofadaptive management principles.	√	√	
BR3	 Methods to adapt the frequency, duration and intensity of grazing and the timing of mechanical slashing during operation of the DPSF will be undertaken to accommodate the prevailing seasonal conditions. The following would be undertaken as part of the OEMP: Regular inspection across the site will be undertaken following intense rainfall events to check that drainage is stable and localised scouring areas are not appearing. Adaptive management principles will be driven by the performance measure of maintaining a groundcover rather than agricultural production. For instance, in a bad run of seasons when vegetative growth may be negligible and fuel load reduction is not needed, stock grazing may not be undertaken. 		¥	
BR <u>3</u>	The OEMP will include an Emergency Response Plan that details risk control measures for electrical hazards in order to safely mitigate potential risks to firefighters, such as a safe method for shutting down and isolating the solar farm. A copy of the plan would be provided to RFS and <u>two copies</u> a copy stored in an 'emergency information cabinet' on-site. <u>Prior to</u> <u>commencement of operation, the operator of the facility shall</u> <u>contact the relevant local emergency management committee</u> (LEMC) (contact details of the LEMC can be obtained from the relevant local council).		\checkmark	
Cumulat	ive impacts			
CI1	In consultation with affected landowners, potential screening vegetation would be considered in certain locations to 'break-up' views of the solar farm.	\checkmark	\checkmark	\checkmark

No.	Recommended mitigation measures	С	0	D
Cl2	Should there be any changes to the estimated construction programs of the projects noted in Table 93 of the EIS, <u>consider</u> the Contractor would be responsible for consulting with other nearby projects to manage any potential cumulative impacts in terms of accommodation availability in Darlington Point or Coleambally.	4		

4 Environmental licences and approvals

Table 4 provides a summary of the environmental licenses and approvals that have been identified as relevant to the proposed development of the DPSF.

Instrument	Licence or approval requirement
EP&A Act, Part 4	State Significant development applications require approval from the Minister for Planning and Environment. This EIS has been prepared in accordance with the requirements of the Secretary of the DPE.
EPBC Act 1999	Based on specialist advice, a referral under the EPBC Act to recommend a Not a Controlled Action Particular Matter was submitted to the DoEE. DoEE determined on 16 July 2018 that the development of the DPSF is Not a Controlled Action under the EPBC Act.
Roads Act, section 138	Any works to public or classified roads require consent under this act from the roads authority. Murrumbidgee Council is the roads authority for Donald Ross Drive.
Construction certificate under the EP&A Act	A construction certificate for building works would be required. Given the likelihood of early works for the Donald Ross Drive site access road, and the subsequent staged release of the design (i.e. civil/structural, mechanical/electrical, buildings etc), a staged approach to the certification of the design will be undertaken as discussed and agreed with Murrumbidgee Shire Council on 5 July 2018.
National Parks and Wildlife Act 1974, section 90	An Aboriginal Heritage Impact Permit (AHIP) is unlikely to be required for the DPSF site.
POEO Act, section 48, Environment Protection Licence	An Environmental Protection Licence (EPL) is not required for the DPSF site. Under Schedule 1, clause 17 of the POEO Act lists electricity generation works with a capacity of 30MW or greater as a scheduled activity requiring an EPL. However, solar energy

provals
)

Instrument	Licence or approval requirement
	works is excluded from this definition and therefore an EPL for the DPSF is not required.
Electricity grid connection under the NEM Rules	Connection to the existing Darlington Point substation will be obtained under a separate approval process, with TransGrid as the nominated determining authority.

Should any additional approvals or licenses be required for the proposed development of the DPSF, these will be obtained prior to construction, or the relevant activity.

5 Conclusions and recommendations

This Response to Submissions (RTS) report has been prepared by Arup on behalf of Edify Energy.

The EIS was on public exhibition from 22 May 2018 to 20 June 2018. Thirteen (13) agency submissions, including the DPS Response to Submissions letter, were raised during the public exhibition period. No community submissions were received on the proposal.

In response to the submissions, the proponent has updated the EIS document including substantive revision of the:

- Biodiversity Assessment Report (Appendix E of this RTS report),
- Cultural Heritage Assessment Report (Appendix D of this RTS report),
- Traffic Impact Assessment (Appendix C of this RTS report), and
- Preliminary Hazard Assessment (Appendix B of this RTS report).

The proponent has adopted 11 new mitigation measures, and modified 34 measures in this RTS (refer Table 3).

Many of the issues raised in submissions are considered to be adequately addressed in the EIS and existing mitigation measures.

In condition of the responses to submissions set out in this RTS report and the proposed mitigation measures committed to in the revised mitigation measures as outlined in Section 3, Table 3, it is considered that all relevant issues and concerns in relation to the proposal have been adequately addressed.

The proposal should now proceed for approval by the Minister, particularly in light of the demonstrable social and economic benefits and the upwardly revised yet manageable biodiversity impacts, which result in a balanced planning outcome whilst contributing to climate change and energy policy objectives for renewable energy development in NSW.
6 List of references

References

ABS. (2016a). Socio-Economic Indexes for Areas. Retrieved from
http://www.abs.gov.au/ausstats/abs@.nsf/mf/2033.0.55.001
ABS. (2016b). 2016 Census - QuickStats. Retrieved from http://www.abs.gov.au/
CSIRO. (2009). Australian Soil and Land Survey Field Handbook. Canberra:
CSIRO Publishing.
DOP. (2011a, January). Applying SEPP 33 - Hazardous and Offensive
Development Application Guidelines. Retrieved from
http://www.planning.nsw.gov.au/Policy-and-
Legislation/~/media/3609822D91344221BA542D764921CFC6.ashx
ICN. (n.d.). ICN Gateway: Helping Suppliers Grow Their Business. Retrieved
from http://gateway.icn.org.au/static/html?f=features&l=1
ICNIRP. (1998). Guidelines for limiting exposure to time-varying electric,
magnetic, and electromagnetic fields. Germany: International Non-
Ionizing Radiation Committee.
ICNIRP. (2010b). ICNIRP Fact Sheet on the Guidelines for limiting exposure to
time-varying electric and magnetic fiels (1 Hz - 100 kHz). Retrieved from
https://www.icnirp.org/cms/upload/publications/ICNIRPLFgdl.pdf
Landcom. (2014). Managing Urban Stormwater: Soils and Construction, volume
1, 4th edition. Retrieved from
http://www.environment.nsw.gov.au/resources/water/BlueBookVol1.pdf
NPWS. (1997). Aboriginal Cultural Heritage Standards and Guidelines Kit.
NSW Government. (2017). Large-Scale Energy Guideline for State Significant
Development, Draft. Sydney: NSW Government.
NSW Heritage Office. (1998). Skeletal Remains: Guidelines for the Management
of Human Skeletal Remains under the Heritage Act 1977. Retrieved from
http://www.environment.nsw.gov.au/Heritage/publications/index.htm#skel
etal
TransGrid. (2016). <i>Network connection opportunities in NSW</i> . NSW: TransGrid.
WorkCover NSW. (2005). Code of Practice: Storage and Handling of Dangerous
Goods. Retrieved from
http://www.safework.nsw.gov.au/data/assets/pdf_file/0005/50729/storag
e-handling-dangerous-goods-1354.pdf

Appendix A – Agency Submissions

Appendix B – Preliminary Hazard Analysis

Appendix C – Revised Traffic Impact Assessment Report

Appendix D – Revised Cultural Heritage Assessment Report

Appendix E – Revised Biodiversity Assessment Report