



# Scoping Report

WELLINGTON SOLAR FARM



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[www.nghenvironmental.com.au](http://www.nghenvironmental.com.au)

e: [ngh@nghenvironmental.com.au](mailto:ngh@nghenvironmental.com.au)

**Bega - ACT and South East NSW**  
suite 1, 216 carp st (po box 470)  
bega nsw 2550 (t 02 6492 8333)

**Sydney Region**  
18/21 mary st  
surry hills nsw 2010 (t 02 8202 8333)

**Canberra - NSW SE & ACT**  
8/27 yallourn st (po box 62)  
fyshwick act 2609 (t 02 6280 5053)

**Brisbane**  
8 trawalla st  
the gap qld 4061 (t 07 3511 0238)

**Newcastle - Hunter and North Coast**  
7/11 union st  
newcastle west nsw 2302 (t 02 4929 2301)

**Wagga Wagga - Riverina and Western NSW**  
suite 1, 39 fitzmaurice st (po box 5464)  
wagga wagga nsw 2650 (t 02 6971 9696)

**Bathurst - Central West and Orana**  
35 morrisset st (po box 434)  
bathurst nsw 2795 (t 02 6331 4541)

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## ACRONYMS AND ABBREVIATIONS

ABS	Australian Bureau of Statistics
AHIMS	Aboriginal heritage information management system
CEMP	Construction environmental management plan
Cwth	Commonwealth
DP&E	Department of Planning and Environment (NSW)
EEC	Endangered ecological community – as defined under relevant law applying to the proposal
EIS	Environmental Impact Statement
EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act 1999</i> (Cwth)
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (NSW)
FBA	Framework for Biodiversity Assessment
ha	hectares
Heritage Act	<i>Heritage Act 1977</i> (NSW)
ISEPP	<i>State Environmental Planning Policy (Infrastructure) 2007</i> (NSW)
km	kilometres
LEP	Local Environment Plan
LGA	Local Government Area
m	Metres
MNES	Matters of National environmental significance under the EPBC Act ( <i>c.f.</i> )
MW	Mega watts
NPW Act	<i>National Parks and Wildlife Act 1974</i> (NSW)
NSW	New South Wales
NV Act	<i>Native Vegetation Act 2003</i> (NSW)
OEH	(NSW) Office of Environment and Heritage, formerly Department of Environment, Climate Change and Water
RET	Renewable Energy Target
RMS	Roads and Maritime Services
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy (NSW)
TSC Act	<i>Threatened Species Conservation Act 1995</i> (NSW)

# 1 INTRODUCTION

## 1.1 PURPOSE OF THIS DOCUMENT

This Scoping Report provides a description of the Wellington Solar Farm proposal, including the site and its surroundings, the statutory framework for approval and identification of key potential environmental issues that may be associated with the solar farm proposal. The report has been prepared to support a request to the Department of Planning and Environment (DP&E) for the Secretary's Environmental Assessment Requirements (SEARs) which would guide the preparation of an Environmental Impact Statement (EIS) for the proposal under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

## 1.2 THE PROPOSAL

### 1.2.1 Site location

The Wellington Solar Farm proposal site is located approximately 2km north east of Wellington, in western central NSW, within the Dubbo Regional Local Government Area (LGA) (refer to Figure 1-1). The proposed solar farm would connect to an existing substation south of the site.

### 1.2.2 Site description

The Wellington Solar Farm proposal site is located on Lots 99, 102, 103 and 104/DP2987; Lot1/DP34690, Lots 89,90,91 and 92/DP520396; and Lot 2/DP807187. The extent of the 550 hectare solar farm site is illustrated in Figure 1-1 and on the preliminary constraints mapping provided at Appendix B. It is agricultural land, and the site has a history of intensive agricultural cultivation. Parts of the site are used for cropping. Aerial imagery and site inspections confirm most of the site has been cleared of trees and has been highly modified by agricultural practices.

Parts of the site are derived from a community of conservation significance: Box Gum Woodland Endangered Ecological Community. Remnants of this community remain present across some of the site.

Three dams occur within the proposal site, one along the eastern boundary, one in the middle of the site and one in the middle of the western portion of the site. Three watercourses, including Wuuluman Creek and two of its tributaries, occur within the proposal site. Wuluuman Creek traverses east to west along the southern portion of the site. One tributary traverses east to west in the northern and central areas of the site, while the other occurs on the far western boundary. Wuuluman Creek is a tributary of the Macquarie River, which is located 1.3km west of the proposal site. Waterways are indicated on the constraints map (Appendix B).

Access to the site would be from Goolma Road, which bounds part of the site to the south. The Mitchell Highway, which intersects with Goolma Road approximately 2.5km from the site entrance would be the major transport route for haulage and site vehicles during construction and operation of the project.

There are several existing transmission lines within the proposal site, which connect to the substation south of Goolma Road. The proposal would require an additional transmission line to connect to the substation, which would be overhead.

One residential dwelling is located within the proposal site, within Lot 90/DP2987. The dwelling is a homestead and is listed as an item of local heritage significance under Schedule 5 of the Wellington Local Environmental Plan 2012. A thorough investigation into the nature and significance of the Heritage item would be carried as part of the preparation of the EIS.

The proposal site also contains dilapidated buildings (potential abattoir and office buildings), which have sometimes been used for storage of grains. These buildings were constructed by a previous landowner and were never completed. An old single room building is located onsite that may have once been used by shearers or as a milk separating shed. Above ground tanks for bore water used for stock are also located within the proposal site.

### **1.2.1 Site locality**

The proposed solar farm is located approximately 2km north east of the town of Wellington, NSW (refer Figure 1-1). The land surrounding the proposal site includes irrigated crops and grazing land. Agriculture is the key industry in Wellington, with the steeper land to the east supporting mainly grazing activities and the gentle undulating land to the west supporting mainly cereal production. Mining exploration activity is of continuing interest, with a number of mineral deposits within the area (Regional Development Australia – Orana, 2016). A search of the Department of Industry (Resources and Energy) MinView on 11 April 2017 confirmed that the proposed site has no current mineral titles.

Aside from the dwelling that is located within the proposal site, the closest receiver is located 30 metres west of the proposal site (non-involved landowner). Consultation undertaken to date with nearby residents is outlined in Section 3.



Figure 1-1 Proposal site (SIXMaps, NSW Land and Property Information, 2017)

### 1.2.2 Proposal description

The Wellington Solar Farm proposal would comprise the installation of a solar plant with a capacity of 180 MW that would supply electricity to the national electricity grid.

An indicative layout will be developed, informed by detailed site investigations, consultation and environmental assessment during the planning and design stage, for submission in the EIS.

The Wellington Solar Farm would be expected to operate for 30 years. The construction phase of the proposal would take approximately 12 months. After the initial 30 year operating period, the solar farm would either be decommissioned, removing all above ground infrastructure and returning the site to its existing land capability, or repowered with new PV equipment subject to landowner and planning consents.

#### Solar farm infrastructure

The proposal would comprise an array of solar panels covering an area of approximately 360 hectares (of the 550 hectare site), a 132kV substation and related infrastructure as follows:

- PV modules mounted on a horizontal tracking structure.
- Site office and maintenance building.
- An access track off Goolma Road.
- Overhead or underground cabling for grid connection to the adjacent substation (132kV).
- Overhead or underground electrical conduits and cabling to connect the arrays on the array site.



- Internal inverter stations to allow conversion of DC module output to AC electricity.
- Energy storage.
- Internal access tracks to allow for site maintenance.
- Perimeter security fencing.
- Landscaping (agreed in consultation with landowners and near neighbours).

## 2 PROPOSAL NEED AND ALTERNATIVES

### 2.1 PROPOSAL NEED

The proposed Wellington Solar Farm supports Australia in its efforts toward providing 23.5 per cent of its energy from renewable resources by 2020, while further establishing regional NSW as a leader in renewable energy. On an annual basis, the proposed Wellington Solar Farm would provide 461 GWh enough clean, renewable energy for about 55,000 average NSW homes while displacing approximately 370,000 metric tons of carbon dioxide – the equivalent of taking about 100,000 cars off the road.

The Wellington Solar Farm proposal would provide the following benefits, specific to Australia's commitments:

- Reduction in greenhouse gas emissions required to meet our energy demands.
- Assisting the transition towards cleaner electricity generation.
- Direct contribution to help in meeting the RET.

At a State level, the Wellington Solar Farm proposal is consistent with current goals and targets for renewable energy generation in NSW. These include:

- Goal 22 of the NSW 2021: A plan to Make NSW Number One (NSW Government 2011). *Contribute to the national renewable energy target [i.e. 20% renewable energy supply] by promoting energy security through a more diverse energy mix, reducing coal dependence, increasing energy efficiency and moving to lower emission energy sources*
- The three goals of the NSW Renewable Energy Action Plan (NSW Government 2013) which include:
  1. Attract renewable energy investment and projects.
  2. Build community support for renewable energy.
  3. Attract and grow expertise in renewable energy.

Additionally, the proposal would allow for the provision of:

- Significant economic benefits to the region, through the creation of direct and indirect jobs, supporting small business and by developing skills in a growing industry. First Solar (Australia) Pty Ltd has a proven track record of hiring local, qualified labour for plant construction and long-term positions for the maintenance and monitoring of daily operations.
- Embedded electricity generation, to supply into the Australian grid closer to the consumption centres.

For the life of the project, the proposal would harness a natural resource (solar energy). While the activity would impact on land available for primary production during the operational phase, the proposal is fully reversible during decommissioning. It involves limited ground disturbance, it would not remove the potential to use the land for primary production (or some alternative land use) after decommissioning.

## 2.2 ALTERNATIVES CONSIDERED

First solar (Australia) Pty Ltd have reviewed numerous sites within NSW for the solar farm proposal and determined that the Wellington site represented an opportunity for PV development that could be developed to meet the federal target of 23.5% by 2020.

Considerations during initial site investigations included:

- Access and capacity to electrical network.
- Favourable Marginal Loss Factor (MLF)<sup>1</sup>
- Availability of suitably sized lots.
- Existing land use and quality.
- Soil structure.
- Site vegetation.
- Flood risk and location relevant to waterways.
- Location of nearby sensitive receivers.
- Locality population density.

First Solar (Australia) Pty Ltd will consider all of the relevant environmental constraints when finalising the layout, once they have been fully investigated through the EIS process. The layout submitted as part of the EIS will balance the solar production and costs while taking into account the relevant environmental constraints. The EIS will include the details on the evolution of the layout, with regard to these constraints.

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<sup>1</sup> The MLF is a parameter used to represent the efficiency of transmitting electricity from the solar farm gate to electricity customers. This parameter is applied to electricity sent out of the solar farm gate when selling electricity to the electricity spot market or customer.

### 3 CONSULTATION

A Community Consultation Plan (CCP) has been prepared to provide a framework to engage with the community and stakeholders about the proposal and ensure opportunities to provide input into the assessment and development process are understood. Stakeholders were identified as those potentially being impacted by the solar farm proposal or having an interest in the project. The CCP has set out consultation requirements with interested parties including adjacent neighbours, near neighbours, local businesses, any special interest groups and representative bodies, such as the Dubbo Chamber of Commerce and the Dubbo Regional Council. The plan also includes strategies for consultation for the community of Wellington and the broader community within the Dubbo Regional LGA.

To date, the following activities, consistent with the CCP, have been undertaken:

1. Dubbo Council provided mailing addresses of rate payers within a 2km radius of the proposed development to First Solar on 11 April, 2017.
2. A mailout was sent by First Solar to all rate payers within a 2km radius of the proposed development, notifying them of the proposed development, on the 19<sup>th</sup> April 2017 (Appendix C.1 includes mail out, lots identified by Council are included as Figure 3-1).
3. Between the 9<sup>th</sup> and 10<sup>th</sup> May 2017, all adjacent neighbours and identified potential sensitive receivers were visited by First Solar.
  - a. If the neighbor was at home, a discussion of the solar farm development was undertaken. This included providing a summary of development, construction and operation phases, key activities and potential impacts in each phase as well as mitigation strategies likely to accompany the development (regulatory and self-imposed). This provided an opportunity for residents to ask questions, contribute their input and provide feedback. Any specific questions were documented for follow up. Additionally, a feedback form (refer to Appendix C.3) was left with the neighbor to provide ongoing opportunities for feedback to be provided by the neighbor.
  - b. Where the neighbour was not at home, a notification letter (refer to Appendix C.2) and a feedback form (refer to Appendix C.3) were left so that contact could be made at a later time.
4. A register documenting all of the conversations with stakeholders has been established and will be updated as the project progresses.

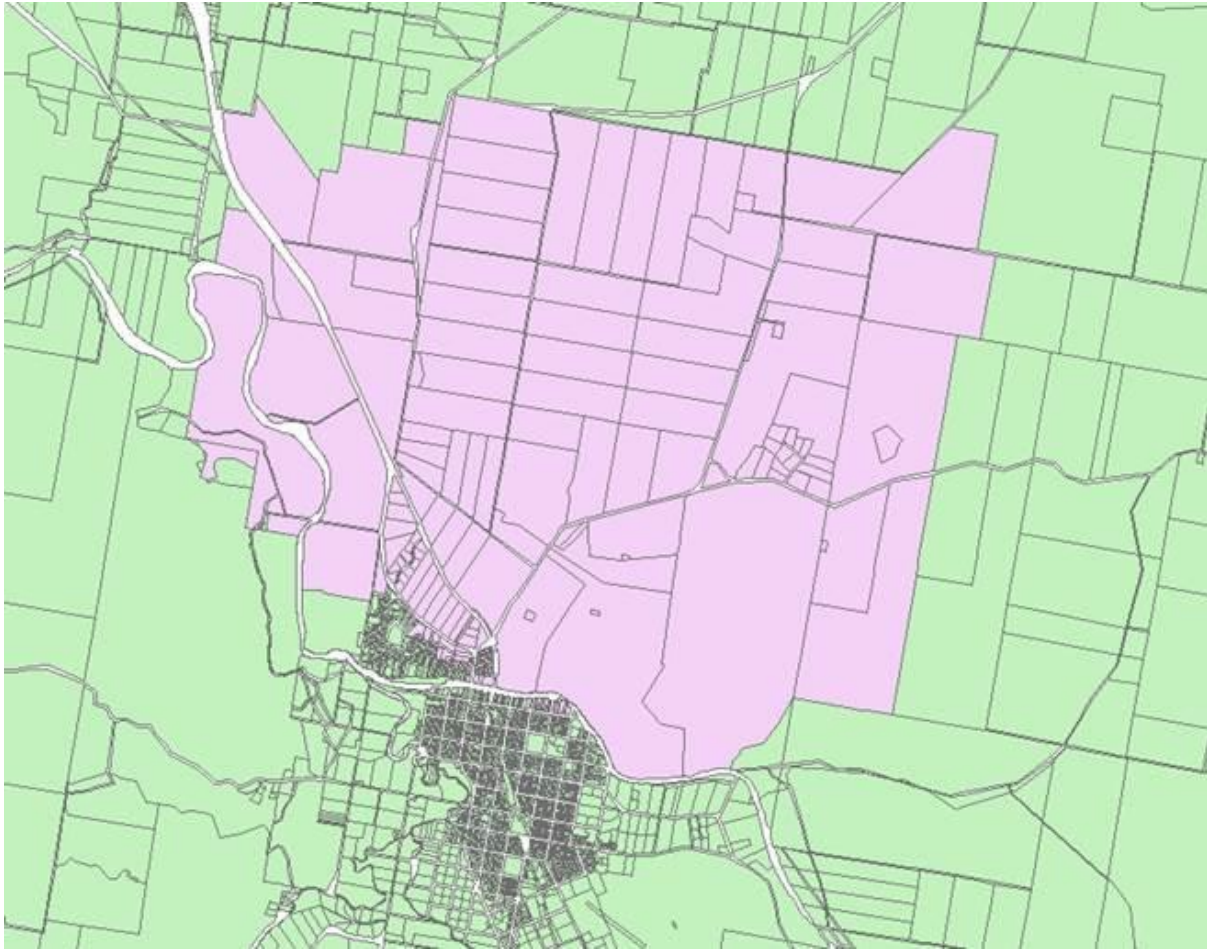


Figure 3-1 Lots within a 2km radius of the proposal site (provided by Dubbo Regional Council, 2017)

As the CCP is implemented in the coming months, the following activities will be undertaken:

- Face to face meetings with stakeholders and concerned landholders as required, e.g. a meeting to be held on 20<sup>th</sup> June set up as a result of neighbour notification.
- An 'open day' to provide detailed information about the proposal to the general public.
- Establishment of a project phone number in addition to the website.

The CCP would aim to ensure that there is effective, ongoing liaison with the community. Measures to reduce adverse impacts and promote positive impacts would be identified in the EIS and appropriate management plans developed for the project.

Agency consultation would also be undertaken in accordance with any requirements of the SEARs.

## 4 PLANNING CONSIDERATION

### 4.1 NSW LEGISLATION

#### 4.1.1 *Environmental Planning and Assessment Act 1979*

Development in NSW is subject to the requirements of the EP&A Act and its associated regulations. Environmental planning instruments prepared pursuant to the Act set the framework for approvals under the Act. The Wellington Solar Farm proposal would be assessed under Part 4 of the EP&A Act.

#### 4.1.2 *State Environmental Planning Policy (State and Regional Development) 2011*

Clause 20 of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* states that the following is considered a state significant development:

*Development for the purpose of electricity generating works or heat or their co-generation (using any energy source, including gas, coal, biofuel, distillate, waste, hydro, wave, solar or wind power) that:*

*(a) has a capital investment value of more than \$30 million, or*

*(b) has a capital investment value of more than \$10 million and is located in an environmentally sensitive area of State significance.'*

The Wellington Solar Farm proposal would have a capital investment cost estimated of more than \$30 million. Therefore, the proposal is classified as "State Significant Development" under Part 4 of the EP&A Act.

State Significant Developments are major projects which require approval from the Minister for Planning and Environment. While the Minister for Planning and Environment is the consent authority for State Significant Development, the Minister may delegate the consent authority function to the Planning Assessment Commission (PAC), the Secretary or to any other public authority.

An Environment Impact Statement (EIS) is prepared in accordance with the requirements of the Secretary's Environmental Assessment Requirements (SEARs) of Department of Planning and Environment (DP&E). In determining the SEARs, the Secretary must consult with relevant public authorities and would have regard to the need to assess key issues raised by those public authorities.

#### 4.1.3 *State Environmental Planning Policy (Infrastructure) 2007*

Clause 34(7) of *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) provides that development for the purpose of a solar energy system may be carried out by any person with consent on any land (except land in a prescribed residential zone). A solar energy system includes a PV electricity generating system. The proposal is therefore permissible with consent within appropriate land zoning.

#### 4.1.4 *Wellington Local Environmental Plan 2012*

The site is located within the Dubbo Regional LGA, which has two Local Environmental Plans. The proposal site is subject to the provisions of the *Wellington Local Environmental Plan 2012*. The solar farm site is located across three land zonings:

- **RU1 - Primary Production:** Electricity generation is prohibited within this land zoning, however the ISEPP allows the development for the purpose of a solar energy system on any land with consent, which overrides the local provisions.
- **R5 – Large Lot Residential:** Electricity generation is prohibited within this land zoning. Additionally, the ISEPP does not allow development for the purpose of a solar energy system in residential zoning. A State Significant Development may however seek approval under the following provisions:
  - Clause 8(2) of the SEPP State and Regional Development 2011, which states that if a single development application comprises development that is only partly State Significant Development, the remainder of the development is also declared to be State Significant Development. Consultation with the Department on similar projects has confirmed that the intent of this clause means if the subdivision is included in the development application with the solar farm, the subdivision is also declared to be state significant; and
  - Section 89E(3) of the *Environmental Planning and Assessment Act 1979*, which states “development consent may be granted despite the development being partly prohibited by an environmental planning instrument”.

Notwithstanding the provisions above, the landowner has initiated rezoning of R5 zoned lots within the development envelop to be rezoned to RU1 Primary Production. This is expected to be resolved prior to the submission of the EIS.

- **SP2 – Infrastructure (Classified Road and Electricity Supply):** Electricity generation is permitted with consent within this zoning.

#### 4.1.5 Roads Act 1993

Approval from the roads authority (RMS and/or Dubbo Regional Council) would be required under section 138 of the Roads Act to erect a structure or carry out a work in, on or over a public road. This is relevant to site access off Goolma Road.

#### 4.1.6 Crown Lands Act 1989

The objects of this Act are to ensure that Crown land is managed for the benefit of the people of New South Wales and in particular to provide for:

- (a) *a proper assessment of Crown land,*
- (b) *the management of Crown land having regard to the principles of Crown land management contained in this Act,*
- (c) *the proper development and conservation of Crown land having regard to those principles,*
- (d) *the regulation of the conditions under which Crown land is permitted to be occupied, used, sold, leased, licensed or otherwise dealt with,*
- (e) *the reservation or dedication of Crown land for public purposes and the management and use of the reserved or dedicated land, and*
- (f) *the collection, recording and dissemination of information in relation to Crown land.*

For the purposes of this Act, the principles of Crown land management are:

- (a) that environmental protection principles be observed in relation to the management and administration of Crown land,
- (b) that the natural resources of Crown land (including water, soil, flora, fauna and scenic quality) be conserved wherever possible,
- (c) that public use and enjoyment of appropriate Crown land be encouraged,
- (d) that, where appropriate, multiple use of Crown land be encouraged,
- (e) that, where appropriate, Crown land should be used and managed in such a way that both the land and its resources are sustained in perpetuity, and
- (f) that Crown land be occupied, used, sold, leased, licensed or otherwise dealt with in the best interests of the State consistent with the above principles.

Under Part 3 of the Act, the Minister for Lands must be satisfied that the land has been assessed prior to any allocation action, i.e. reservation, dedication, sale, lease, licence or permit. The purpose of a land assessment is to ensure decisions made in relation to Crown land are in accordance with the principles of Crown land management by (amongst other matters) including an assessment of the capabilities of Crown land and the identification of suitable land uses.

Preliminary data obtained from NSW Land and Property Information so far indicates Crown land would not be affected by the solar farm site. This would be further investigated in the EIS and the Department of Primary Industries (Lands) would be consulted during the assessment process.

#### **4.1.7 Environment Protection and Biodiversity Conservation Act 1999**

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is administered by the Commonwealth Department of the Environment and Energy (DoEE). Under the EPBC Act, if the Minister determines that an action is a 'controlled action' which would have or is likely to have a significant impact on a Matter of National Environmental Significance (MNES) or Commonwealth land, then the action may not be undertaken without prior approval of the Minister.

The EPBC Act identifies the following nine MNES:

- World Heritage properties.
- National heritage places.
- Ramsar wetlands of international significance.
- Threatened species and ecological communities.
- Migratory species.
- Commonwealth marine areas.
- The Great Barrier Reef Marine Park.
- Nuclear actions (including uranium mining).
- Water resources (in relation to coal seam gas development and large coal mining development).

Actions that adversely affect these matters may be deemed to be a 'controlled action' under the Act.

A search of the Commonwealth Protected Matters Search Tool (coordinate search, undertaken on 16/05/2017) indicates that there are no World Heritage or National Heritage areas or items within the proposal site. Search results listed four Wetlands of International Importance that are either known to occur or have potential to occur within ten kilometres, however these are not relevant to the site or proposal (closest being 150-200km upstream of the proposal site). Two areas of Commonwealth land were



identified, Australian Postal Commission and Australian Telecommunications Commission. These are not present at the site.

Two threatened ecological communities were returned from the search, including White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland (Box Gum Woodland) (Critically Endangered), and Grey Box (*Eucalyptus macrocarpa*) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia (Endangered). At least one patch of the Critically Endangered Box Gum Woodland community is known to occur at the proposal site.

28 threatened species and 11 migratory species were also returned from the Protected Matters Search. The site provides suitable habitat for several of these species, and the potential impacts are discussed further in Section 5.2. Further flora and fauna studies would confirm whether impacts to these entities would occur, during the preparation of the EIS.

#### 4.1.8 Native title Act 1993

The *Native Title Act 1993* provides a legislative framework for the recognition and protection of common law native title rights. Native title is the recognition by Australian law that Indigenous people had a system of law and ownership of their lands before European settlement. Where that traditional connection to land and waters has been maintained and where government acts have not removed it, the law recognises this as native title.

People who hold native title have a right to consult or continue to practise their law and customs over traditional lands and waters while respecting other Australian laws. This could include visiting to protect important places, making decisions about the future use of the land or waters, hunting, gathering and collecting bush medicines. Further, when a native title claimant application is registered by the National Native Title Tribunal, the people seeking native title recognition gain a right to consult or negotiate with anyone who wants to undertake a project on the area claimed.

Where native title does exist in relation to the proposal site, First Solar (Australia) Pty Ltd would comply with the provisions of the *Native Title Act 1993*.

## 4.2 OTHER LEGISLATION

Under Section 79B(2A) of the EP&A Act, concurrence under Section 79B including concurrence under the following acts would not be required for a State Significant Development. Nonetheless, impacts on native vegetation, threatened species, Aboriginal and historic heritage will be investigated in accordance with appropriate guidelines and as directed by NSW Office of Environmental and Heritage, within the SEARs.

#### 4.2.1 Native Vegetation Act 2003

The *Native Vegetation Act 2003* regulates the clearing of native vegetation. Clearing is defined as cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ringbarking, uprooting or burning native vegetation including native grasses and herbage.

The potential to impact native vegetation is discussed in Section 5.2 of this report.

#### 4.2.2 Threatened Species Conservation Act 1995

The *Threatened Species Conservation Act 1995* (TSC Act) provides for the conservation of threatened species, populations and ecological communities of animals and plants. The TSC Act sets out a number of

specific objects relating to the conservation of biological diversity and the promotion of ecologically sustainable development.

The potential to impact threatened species, populations and ecological communities listed under this Act is discussed in Section 5.2 of this report.

#### **4.2.3 National Parks and Wildlife Act 1974**

Under the *National Parks and Wildlife Act 1974*, the Director-General of the National Parks and Wildlife Service is responsible for the care, control and management of all national parks, historic sites, nature reserves, Aboriginal areas and state game reserves. The Director-General is also responsible under this legislation for the protection and care of native fauna and flora, and Aboriginal places and objects throughout NSW.

The potential impact to Aboriginal heritage and native fauna and flora are discussed in Section 5.2 of this report.

#### **4.2.4 Heritage Act 1977**

This Act aims to conserve heritage values. The Act defines 'environmental heritage' as those places, buildings, works, relics, moveable objects and precincts listed in the Local or State Heritage Significance. A property is a heritage item if it is listed in the heritage schedule of the local Council's Local Environmental Plan or listed on the State Heritage Register, a register of places and items of particular importance to the people of NSW.

The potential to impact environmental heritage is discussed in Section 5.2 of this report.

## 5 PRELIMINARY ENVIRONMENTAL ASSESSMENT

### 5.1 METHODOLOGY

NGH Environmental has undertaken a preliminary constraints analysis of the Wellington Solar Farm proposal site. The analysis was undertaken based on desktop review and site surveys, to identify high level constraints and major risks of the project, as well as inform the development of a site layout that reflects the site's environmental constraints.

Preliminary environmental constraints were defined to assess the potential developable area of the site. The preliminary constraints map is provided in Appendix B. This will be used to guide further detailed investigations and ultimately the site infrastructure layout. Constraints mapping will also be refined based on these investigations, prior to submission of the EIS.

A summary of the key environmental issues identified to date is provided in Section 5.2. The intent of the discussion is to demonstrate an understanding of the issues that require further environmental assessment and proposed investigation strategies for these key issues. The potential impacts of other (less significant) issues are discussed in Section 5.3.

### 5.2 ASSESSMENT OF KEY ISSUES

#### 5.2.1 *Watercourses and hydrology*

Three dams occur within the proposal site, one along the eastern boundary, one in the middle of the site and one in the middle western portion of the proposal site. Three watercourses, Wuuluman Creek and two of its tributaries occur within the proposal site. Wuuluman Creek traverses east to west along the southern section of the site, while one tributary is also east to west in the northern portion. The other tributary is along the boundary of the middle western portion of the site. The Macquarie River is located 1.3km west of proposal site.

#### **Conclusions and need for further assessment**

The EIS would assess the impacts to waterways and include appropriate mitigation measures, such as buffering these areas for avoidance, where possible.

#### 5.2.2 *Land use*

The proposal site is located approximately 2km north of Wellington; a moderate sized rural town of about 4,500 residents with links to historic goldmining and now known for rich agricultural lands.

The proposal site is located in an agricultural area and aerial imagery suggests the site has a history of intensive agricultural cultivation; clearing and cropping are evident. The surrounding land includes irrigated crops and grazing land.

Other land uses nearby include the Wellington Correctional Centre, east of the proposal site, across Goolma Road. Nearby recreational areas include the Macquarie River, approximately 2km south of the proposal site, and Mount Arthur Reserve, south west of the proposal site.

The approved Bodangora Wind Farm site is located approximately 9 km north east of the proposal site. An existing substation south of Goolma Road is located adjacent to the proposal site.

Approximately 19 houses occur within 1km of the proposal site. The closest receiver to the solar farm site is located approximately 30m north of the proposal site, and is a non-involved landholder. There is also one residential dwelling located within the proposal site on Lot 90/DP2987 (involved landholder).

A search of the Department of Industry (Resources and Energy) MinView on 11 April 2017 found the site to have no current mineral titles. Additionally, as the proposal is highly reversible and would not affect exploration in the long term, this is considered a negligible constraint.

### Conclusions and need for further assessment

Being highly reversible, and having potential for the development of specific mitigation strategies, the solar farm operation is not considered to be incompatible with local land use activities. Further investigation of impacts on these receivers / land uses will be detailed within the EIS.

### 5.2.3 Biodiversity

The potential ecological constraints within the Wellington area and the proposal site have been identified based on the following information sources:

- Existing threatened species listings under the TSC Act and EPBC Act.
- Existing records of threatened species sightings in the proposal site, as recorded in the Bionet Database (OEH).
- Department of Environment Protected Matters Search Tool (nationally threatened species listed under the EPBC Act).
- Site surveys completed by experienced ecologists.

### Threatened species and ecological communities

A search of the EPBC Act Protected Matters Search Tool was carried out for the proposal site, which included a 10km buffer area. The search identified two endangered Ecological Communities: White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland, and Grey Box (*Eucalyptus macrocarpa*) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia. The search also identified 29 threatened species and 11 migratory species that are either known to occur or have potential to occur in the search area, including:

- 7 flora species
  - *Androcalva procumbens*
  - *Euphrasia argute*
  - *Philotheca ericifolia*
  - Tarengo Leek Orchid (*Prasophyllum petilum*)
  - A leek orchid (*Prasophyllum sp*)
  - Small Purple-pea (*Swainsona recta*)
  - *Tylophora linearis*
- 9 bird species
  - Regent Honeyeater (*Anthochaera phrygia*)
  - Australasian Bittern (*Botaurus poiciloptilus*)
  - Curlew Sandpiper (*Calidris ferruginea*)
  - Painted Honeyeater (*Grantiella picta*)
  - Swift Parrot (*Lathamus discolor*)
  - Malleefowl (*Leiopa ocellata*)
  - Eastern Curlew (*Numenius madagascarensis*)

- Superb Parrot (*Polytelis swainsonii*)
- Australian Painted Snipe (*Rostratula australis*)
- 4 fish
  - Flathead Galaxias (*Galaxias rostratus*)
  - Trout Cod (*Maccullochella macquariensis*)
  - Murray Cod (*Maccullochella peelii*)
  - Macquarie Perch (*Macquaria australasica*)
- 6 mammals
  - Large-eared Pied Bat (*Chalinolobus dwyeri*)
  - Spot-tailed Quoll (*Dasyurus maculatus maculatus*)
  - Corben's Long-eared bat (*Nyctophilus corbeni*)
  - Greater Glider (*Petauroides volans*)
  - Koala (*Phascolartos cinereus*)
  - Grey-headed Flying-fox (*Pteropus poliocephalus*)
- 2 reptiles
  - Pink-tailed Worm-lizard (*Aprasia parapulchella*)
  - Striped Legless Lizard (*Delma impar*)

A search of the OEH Wildlife Atlas database atlas for the Central West - Upper Slopes CMA subregion identified three Endangered Ecological Communities, 22 recorded threatened flora species and 59 recorded threatened fauna species, comprising of 2 amphibians, 41 bird species, 3 reptiles and 13 mammal species. Only one threatened species has been recorded within the proposal site, a Little Eagle (*Hieraetus morphnoides*) along the southern boundary of the proposal site. Within 5km of the proposal site the Small Purple Pea (*Swainsona recta*) and Black Falcon (*Falco subniger*) have also been recorded.

### **Biodiversity constraints**

Aerial Imagery and site inspections confirm most of the site has been cleared of trees and has been highly modified by agricultural practices. However, several patches of the Box Gum Woodland Endangered Ecological Community do occur onsite. This community is listed as threatened under the TSC Act. Furthermore, at least one patch of the Box Gum Woodland community onsite is considered to qualify as the Critically Endangered Box Gum Woodland community listed under the EPBC Act.

There is potential for the site to provide habitat for flora and fauna that are known to utilise Box Gum Woodland. This would be investigated in detail as part of the preparation of the EIS.

Site inspections have identified that small areas of native dominated grasslands may provide habitat with potential to support threatened flora species (including *Swainsona recta* and *Swainsona sericea*). Targeted surveys for this species would be need to be undertaken if impacts could not be avoided in these areas. The site also contains suitable habitat for the threatened Pink-tailed Worm-lizard, in the form of rocky outcrops. Targeted surveys for this species would also need to be undertaken, if the proposal were to impact these habitat features. The site also contains suitable habitat for the Regent Honeyeater (*Anthochaera Phrygia*). The potential for the proposal to impact this species and its habitat would be investigated further during preparation of the EIS.

Two creeks cross the site. Waterways and riparian corridors provide aquatic habitat and fauna movement corridors and have high potential to transport sediments and other pollutants and are regarded as a high constraint. Permits may apply for works in waterways and construction practices will be subject to best practice methodologies and rehabilitation requirements.

A preliminary constraints map is provided at Appendix B and details the preliminary biodiversity constraint areas.

### Conclusions and need for further assessment

As part of the EIS, the detailed ecological surveys and further investigation and assessment will be undertaken in the format of a NSW Framework for Biodiversity Assessment (FBA) - Biodiversity Assessment Report, specific to major projects. This will include targeted surveys for candidate species, collection of Biometric plot data and the calculation of any biodiversity offsets required for the project, in accordance with the FBA. If calculations determine that offset credits are required to offset impacts, then an offset strategy would be required to be developed in accordance with the FBA.

As noted above, targeted surveys may be required for the following:

- Threatened flora species, including *Swainsona recta* and *Swainsona sericea*
- Threatened reptile species, including the Pink-tailed Worm-lizard.
- Remnant woodland and native dominated grasslands (EECs)

#### 5.2.4 Aboriginal heritage

A search of the Aboriginal Heritage Information Management System (AHIMS) was carried out on 10 April 2017, centred on the proposal site and with a buffer of approximately 25km. 98 Aboriginal sites were identified in the search area. There have been no items recorded at the proposal site, however a number of items have been recorded near the proposal site including:

- 1.25km south west
- 850m, 900m and 1.8km south
- 980m east

The current landforms and vegetation on site imply a moderate level of modification, such as ploughing. This is likely to reduce the potential for Aboriginal Heritage sites of significance in these areas. Areas near waterways, such as along Wuuluman Creek and its tributaries within the proposal site would be targeted area for an Aboriginal Heritage survey as part of the EIS.

### Conclusions and need for further assessment

An Aboriginal Heritage Assessment of the development footprint and stakeholder consultation process would be completed as part of the EIS. If any Aboriginal Heritage sites are identified that may be potentially affected by the proposed site, mitigation measures would be determined in accordance with the *Guide to Investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011).

#### 5.2.5 Historic heritage

A search of the Australian Heritage database on the 6 April 2017 for the Wellington LGA found one Commonwealth listed item; the Wellington Post Office, located approximately 3.3km south.

A search of the NSW Heritage Register on 6 April 2017 for the Wellington LGA identified 6 listed items under the NSW Heritage Act and 62 items listed under the Wellington LEP and by state agencies. One of these items occurs within the proposal site boundaries: The 'Narrawa Homestead', situated on Lot 90 DP 2987, has been identified as an Historic heritage item of local significance under the Wellington LEP.

The proposal site is also adjacent to another two items listed under the Schedule 5 of the Wellington LEP 2012, Keston Homestead (located approximately 500 metres to the south west) and Noonee Nyrang Homestead (located approximately 1.3 km to the north).

#### **Conclusions and need for further assessment**

The potential for the proposal to impact heritage items will be investigated and assessed during preparation of the EIS. Potential impacts to the Narrawa homestead would be thoroughly investigated, and this will include an inspection of the homestead by an experienced heritage consultant and liaison with Dubbo Regional Council's heritage advisor regarding the item. Suitable mitigation strategies will be developed to mitigate any impacts.

### **5.3 OTHER ENVIRONMENTAL ISSUES**

There are several additional environmental matters that have been identified for further investigation, but which are not considered to be key issues or to represent a high constraint to development. These matters are considered 'secondary issues' for investigation, given the characteristics of the proposal and the ability to adopt standard safeguards for mitigation.

Secondary issues would be addressed in sufficient detail to assess the level of their impacts (if any). It is anticipated that any impacts identified would be able to be managed through appropriate mitigation measures and management plans. Secondary issues are outlined in Table 5-1.

Table 5-1 Other environmental issues

Issue	Existing environment	Potential impacts	Management and mitigation measures
<b>Soils</b>	<p>One soil landscape occurs within the proposal site:</p> <ul style="list-style-type: none"> <li>• Bodangora</li> </ul> <p>This soil type has a high erosion hazard under cultivation and low cover levels.</p>	<p>Construction activities would include minor excavations and vegetation removal which have the potential to cause soil erosion and sedimentation and dust issues.</p>	<p>The design would ensure adequate all-weather access to the site during construction and operation is provided to avoid erosion/sedimentation impacts and tracking of soil, particularly during and following rain events.</p> <p>The EIS would provide thorough consideration of soil impacts and proposed mitigation measures during construction and operation.</p>
<b>Access and traffic</b>	<p>Access to the site would be from Goolma Road which bounds part of the site to the south-east. The access track would be constructed as part of the works.</p> <p>The Mitchell Highway, which intersects with Goolma Road approximately 2.5km from the proposed site entrance, would be the major transport route for haulage and site vehicles during construction and operation of the project.</p>	<p>Construction traffic would impact traffic along Goolma Road and Mitchell Highway. The proposal may require construction of a formal intersection on Goolma Road at the location of the site access. Maintenance access tracks during operation would also be required across the proposal site.</p> <p>During construction, there may be impacts to nearby receivers associated with dust, vibration and noise generation.</p>	<p>Construction traffic impacts would be considered in the EIS and take into consideration existing traffic volumes and any requirements from the roads authority. The requirement for upgrades would be considered in the EIS.</p> <p>The mitigation measures would require a Traffic Management Plan be prepared.</p>



Issue	Existing environment	Potential impacts	Management and mitigation measures
<b>Contamination</b>	<p>A search of the NSW OEH Contaminated Lands Register on 6 April 2017 identify no sites within the Wellington locality. The proposed site does not appear on the List of NSW Contaminated Sites notified to the EPA, as at 6 April 2017.</p> <p>An Environmental Site Assessment (NGH Environmental, 2017) has been undertaken for the proposal site to evaluate the potential presence of hazardous substances and soil and/or groundwater contamination.</p>	<p>There is no evidence of contaminated land occurring at the proposal site, and considering the past and present land uses it is considered unlikely that buried contaminants occur onsite.</p>	<p>Risks associated with contamination at the site are considered low and therefore no detailed investigation is likely to be required within the EIS.</p> <p>The mitigation measures would require a CEMP be prepared to manage any contamination identified during site construction.</p>
<b>Air Quality</b>	<p>The air quality in Wellington is generally expected to be good and typical of that found in a rural setting in NSW due to low population numbers. Existing sources of air pollution in such a location are expected to comprise vehicle emissions and dust from agricultural practices. During colder months, there may be a minimal increase in air contaminants due to smoke emissions from the operation of solid fuel heating.</p>	<p>The construction of the proposal is not anticipated to have a significant impact on air quality, and would mostly be related to dust during dry periods and vegetation removal. Impacts to air quality during operation is likely to be negligible.</p> <p>There is an opportunity to improve air quality in operation by maintaining ground cover beneath the panels compared to existing cropping operations.</p>	<p>The mitigation measures would require a CEMP be prepared to manage air quality impacts during the construction of the project.</p>

Issue	Existing environment	Potential impacts	Management and mitigation measures
<b>Hazard and Risk - EMF</b>	A 132 kv transmission line to connect the site to the substation is proposed.	The transmission line would be constructed between the solar farm and the adjacent substation and would intersect Goolma Road. The electromagnetic field (EMF) that would be generated by the proposed transmission line is expected to be below the guideline for public exposure and would not be expected to have an adverse impact on human health.	The EMF levels of the proposed transmission line would be assessed as part of the EIS. Standard design provisions are expected to ensure impacts are acceptable to nearby receivers.
<b>Hazard and Risk - Bushfire</b>	The proposal site has been predominantly cleared for agricultural purposes.	The proposal is unlikely to be affected by bushfire, or pose a significant bushfire risk.	The proposed development is unlikely to result in an increased risk of bushfire for the site. This would be assessed in the EIS. During construction and operation phases of the project, the industry standard is that staff are trained in bushfire management, bringing additional fire-fighting capability to the locality to mitigate this potential impact.

Issue	Existing environment	Potential impacts	Management and mitigation measures
<b>Aviation</b>	An airstrip is located approximately 5km north-east of the proposal site.	It is noted that solar panels are designed to absorb as much sunlight as possible. They therefore reflect a very low percentage of the light they receive and are not considered likely to result in glare or reflections that would affect air traffic. There are numerous instances of solar panel installations at airports without adverse impact to airport functions.	The EIS would provide information about glare impacts related to aviation.
<b>Social and economic impacts</b>	The proposal site is located within the Dubbo Regional LGA. The town of Wellington had a population of 4,540 in 2011 (ABS, 2017).  The closest town to the proposal site is Wellington, located 2km to the south-west.	The proposal would generate economic benefits during construction and operation, including local employment opportunities.	The EIS would assess potential social and economic impacts of the proposal. Mitigation strategies would aim to maximise local economic benefits.
<b>Waste Management</b>	The proposal would generate a number of waste streams and utilise a variety of materials during the construction phase.	During construction, excavated material and green waste would be generated as waste. Packaging from panels and other components would require disposal.  Limited operational waste would be associated with this proposal.	A Waste Management Plan (WMP) would be required to be developed and incorporated into the CEMP, prior to construction. This would incorporate the principles to avoid, re-use and recycle to minimise wastes.

## 6 CONCLUSION

This report has outlined the proposed Wellington Solar Farm and established the planning context of the project. The proposal would be assessed under Part 4 of the EP&A Act and classed as State Significant Development under *State Environmental Planning Policy (State and Regional Development) 2011*.

Potential environmental impacts associated with the project have been categorised as key issues or secondary issues. Based on this scoping study, key chapters of the EIS are proposed as:

- Watercourses and hydrology
- Land use
- Biodiversity
- Aboriginal heritage
- Historic Heritage

Secondary issues will be investigated in lesser depth, through desktop investigation.

Once received, the EIS would be prepared in accordance with the project-specific SEARs. Mitigation measures will be developed for inclusion in the EIS and will address the management of key issues and other issues identified in the assessment process.

## 7 REFERENCES

- Australia Bureau of Statistics (2017) Wellington 2011 Census Quickstats, accessed 24 May 2017 from [http://www.censusdata.abs.gov.au/census\\_services/getproduct/census/2011/quickstat/SSC11041](http://www.censusdata.abs.gov.au/census_services/getproduct/census/2011/quickstat/SSC11041) .
- Department of Environment and Climate Change NSW (2009) Interim Construction Noise Guideline <http://www.epa.nsw.gov.au/resources/noise/09265cng.pdf>
- NGH Environmental (2017) Environmental Site Assessment Draft v1
- NSW Government (2013) Renewable Energy Action Plan <http://www.resourcesandenergy.nsw.gov.au/energy-consumers/sustainable-energy/renewable-energy-action-plan>
- NSW Government (2017) NSW Titles Viewer accessed on line 8 December <http://nswtitles.minerals.nsw.gov.au/nswtitles/>
- NSW Government (2011) NSW 2021: A plan to make NSW Number one
- NSW Office of Environment and Heritage (2011) Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW. <http://www.environment.nsw.gov.au/resources/cultureheritage/20110263ACHguide.pdf>
- Regional Development Australia – Orana, 2016, accessed 13 April 2016, <http://www.lovethefifelive.com.au/our-towns/wellington/>

## APPENDIX A SITE PHOTOGRAPHS

### Eastern lots



Western lots



**Locality** – town centre, electricity infrastructure adjacent to development site (power lines and substation) and Wellington Correctional Centre, next to which a larger capacity facility is currently being constructed





## APPENDIX B PRELIMINARY CONSTRAINTS MAPPING

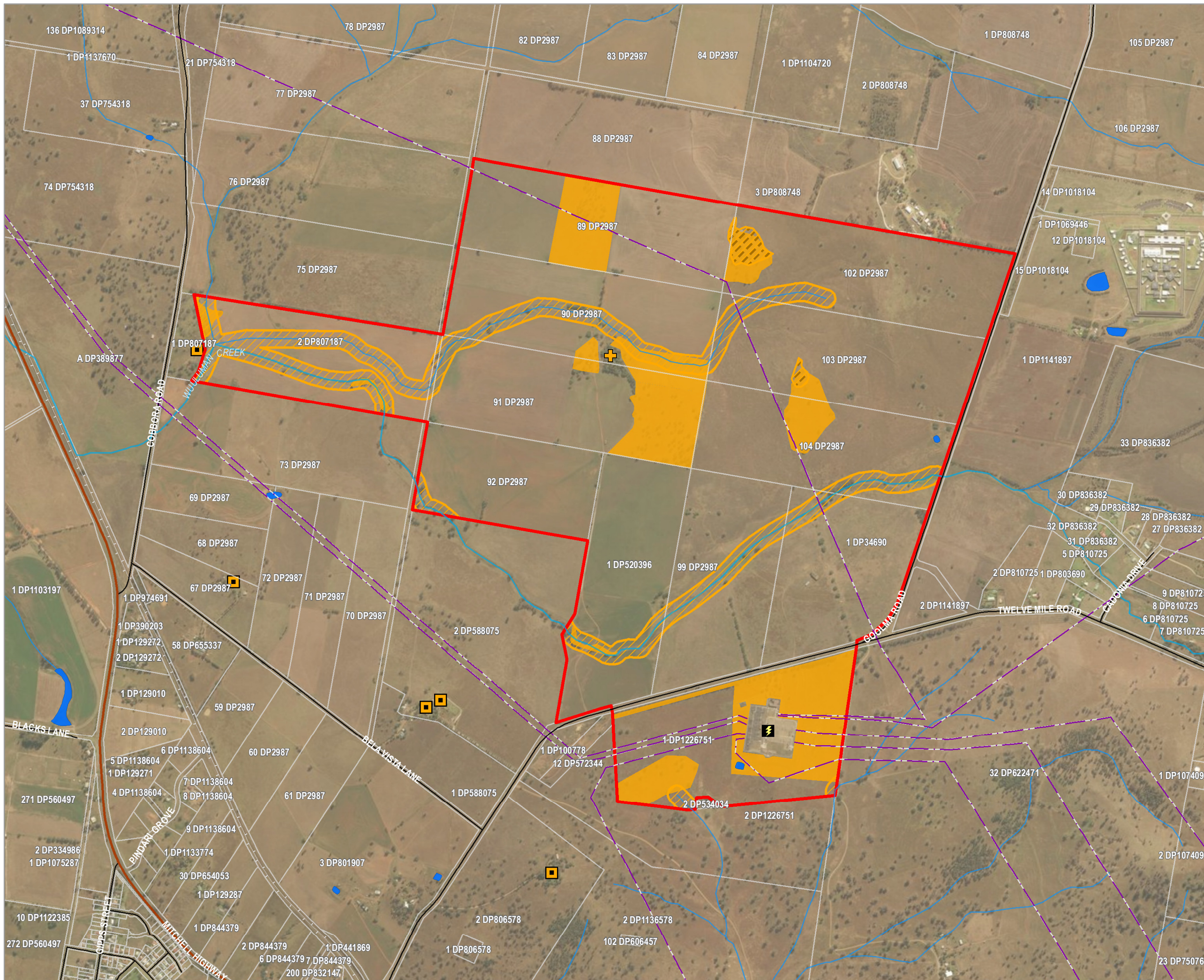
The attached constraints mapping is based on desktop investigation and limited validation. Moderate and High constraint areas require more detailed investigation to determine the extent impacts should be respectively minimised and avoided.

These include:

- **High constraint receivers** – Several near neighbours have been identified which may have elevated or close views of the site that should be investigated further. Further investigation and consultation will be undertaken and documented in the EIS.
- **High constraint heritage** – The ‘Narrawa Homestead’, situated on Lot 90 DP 2987, has been identified as a heritage item of local significance. Further investigation will be undertaken as part of the historic heritage assessment.
- **High constraint drainage lines** – 40m either side of drainage lines is mapped as a constraint. These drainage lines generally appear in poor condition but any crossings or impact on these will required detailed assessment and mitigation if they cannot be adequately buffered and avoided.
- **High constraint potential rocky outcrop** – The extent of the habitat and potential to contain threatened species is currently under further investigation in the biodiversity assessment.
- **High constraint vegetation** – This native vegetation may be derived from an Endangered Ecological Community (EEC) and be in moderate to good condition. Further investigation in accordance with the Framework for Biodiversity Assessment will be undertaken.

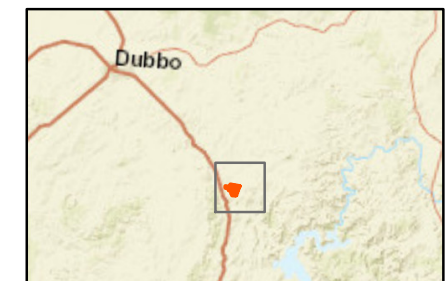
# CONSTRAINTS

## Wellington Solar Farm



- Substation
- Local road
- Highway
- Existing transmission lines
- Farm dam / other water body
- Minor drainage feature
- Drainage line
- Railway
- Project boundary
- Sensitive receiver (High)
- Historic heritage site (High)
- Drainage line (40m) (High)
- Potential rocky outcrops (High)
- Vegetation constraint (High)

**Notes:**  
 - Base map © Esri and its data suppliers.  
 - Base layers from LPI and Geoscience Australia, accessed 2017



A3 @ 1:16000  
 Ref: SW121 Wellington SF  
 Author: SP 19/06/2017

## APPENDIX C CONSULTATION MATERIALS

## **C.1 COMMUNITY MAIL OUT LETTER**

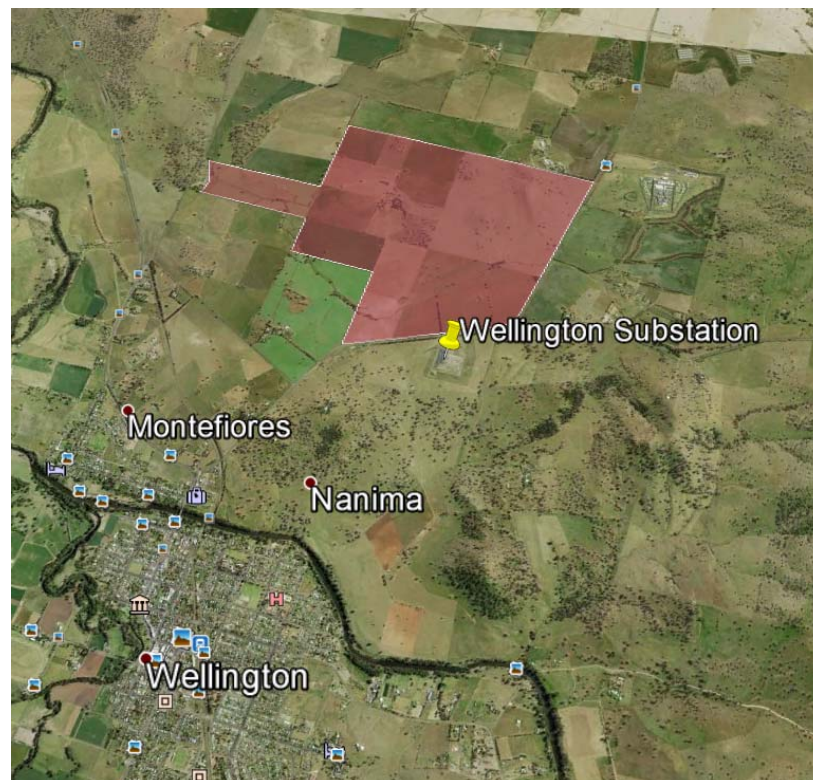
18 April 2016

### Planning Notification: Proposed Wellington Solar Farm

Dear Resident,

First Solar Australia is proposing to deliver the Wellington Solar Farm, a 180 megawatt (MW) capacity photovoltaic (PV) solar power project located approximately two kilometres north east of Wellington in New South Wales (NSW). The 490-hectare site selected for the Wellington Solar Farm is situated on Goolma Road and was chosen for its availability of existing transmission capacity on-site (avoiding the need to build new transmission lines), its excellent solar resource, and its predominantly clear flat land. These factors make it an ideal location for a solar power project.

Proposed Project Location:



Located in regional NSW, the project will benefit directly from existing solar supply chains and operations and maintenance hubs, and will provide significant economic benefits to the region, through the creation of direct and indirect jobs, supporting small business and by developing skills in a growing industry. First Solar has a proven track record of hiring local, qualified labour for plant construction and long-term positions for the maintenance and monitoring of daily operations.



First Solar is committed to the communities in which it operates and will strive to minimise environmental impact while maximising clean energy output. When in operation, our projects generate electricity with no water use, no air emissions, and no waste production, resulting in the smallest carbon footprint of any PV technology available. On an annual basis, the proposed Wellington Solar Farm will provide enough clean, renewable energy for about 55,000 average NSW homes while displacing approximately 369,000 metric tons of carbon dioxide – the equivalent of taking about 98,000 cars off the road.

The proposed Wellington Solar Farm is currently in the initial stages of planning, and First Solar is committed to directly engaging with residents and other stakeholders to ensure the local community is well informed through-out the planning process and questions are addressed.

Proposed Project Timeline:

	Timing	Planning Milestones
COMMUNITY CONSULTATION	April 2017	Preparation of Constraints Mapping and Scoping Document
	June 2016	Application to DPE for SEARs
	July 2016	Submission of Network Connection Application
	Q3 2017	Preparation of Development Application
	August 2017	Exhibition of Environmental Impact Statement
	September 2017	Preparation of Submission Report
	December 2017	Project Approval Received
	January 2018	Construction Period Commences
	December 2018	Construction Complete
	January 2019	Commercial Operation

For more information on the proposed Wellington Solar Farm, to provide comments on the proposal and to register for regular updates please:

**Call:** 02 9002 7700

**Email:** WellingtonSolarFarm@firstsolar.com

Kind regards,

Anna Cain  
Project Manager – Wellington Solar Farm  
First Solar Australia Pty Ltd.

## **C.2 NEIGHBOUR NOTIFICATION LETTER**

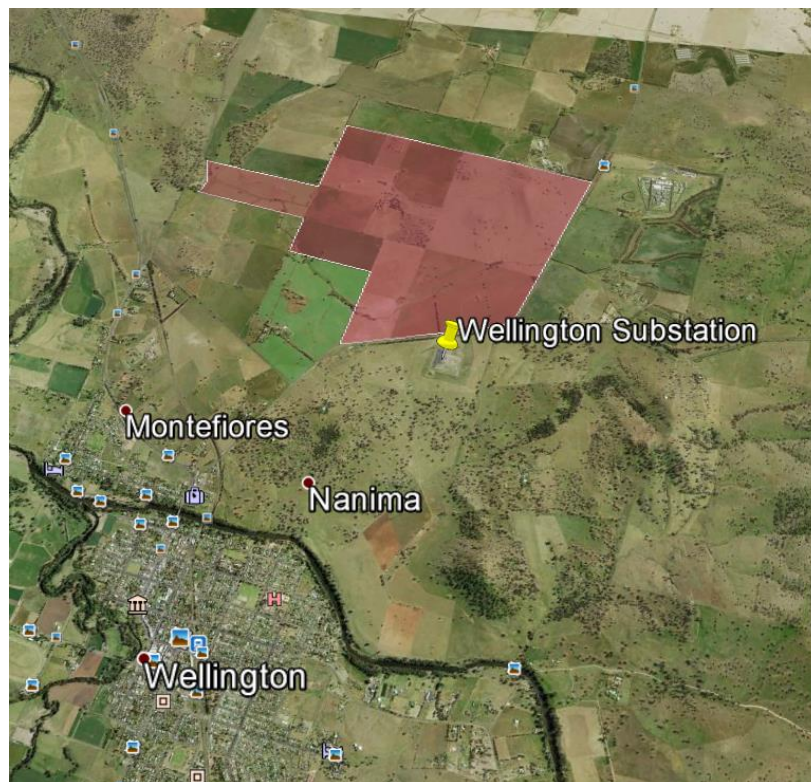
9 May 2017

### Neighbour Notification: Proposed Wellington Solar Farm

Dear Resident,

First Solar Australia is proposing to deliver the Wellington Solar Farm, a 180 megawatt (MW) capacity photovoltaic (PV) solar power project located approximately two kilometres north east of Wellington in New South Wales (NSW). The 490-hectare site selected for the Wellington Solar Farm is situated on Goolma Road and was chosen for its availability of existing transmission capacity on-site (avoiding the need to build new transmission lines), its excellent solar resource, and its predominantly clear flat land. These factors make it an ideal location for a solar power project.

Proposed Project Location:



Located in regional NSW, the project will benefit directly from existing solar supply chains and operations and maintenance hubs, and will provide significant economic benefits to the region, through the creation of direct and indirect jobs, supporting small business and by developing skills in a growing industry. First Solar has a proven track record of hiring local, qualified labour for plant construction and long-term positions for the maintenance and monitoring of daily operations.





First Solar (Australia) Pty Ltd  
Level 3, 16 Spring Street,  
Sydney NSW, 2000

First Solar is committed to the communities in which it operates and will strive to minimise environmental impact while maximising clean energy output. When in operation, our projects generate electricity with no water use, no air emissions, and no waste production, resulting in the smallest carbon footprint of any PV technology available. On an annual basis, the proposed Wellington Solar Farm will provide enough clean, renewable energy for about 55,000 average NSW homes while displacing approximately 369,000 metric tons of carbon dioxide – the equivalent of taking about 98,000 cars off the road.

As part of First Solar's community consultation process, First Solar would like to give you the opportunity to engage with us directly. We would like to explain the proposed solar farm development, answer any of your questions and provide you the opportunity to provide input to the project.

I visited you at \_\_\_\_\_.

I have included herein my contact information. If you would like to arrange some time to meet and discuss the project, please do not hesitate to call or email me. I have also attached a feedback form if you would like to provide feedback via this.

For more information on the proposed Wellington Solar Farm, to provide comments on the proposal and to register for regular updates please call: 02 9002 7700 or email: [WellingtonSolarFarm@firstsolar.com](mailto:WellingtonSolarFarm@firstsolar.com):

Kind regards,

Anna Cain  
Project Manager – Wellington Solar Farm  
First Solar Australia Pty Ltd.  
D: 02 9002 7700 M: 0437263054  
E: [WellingtonSolarFarm@firstsolar.com](mailto:WellingtonSolarFarm@firstsolar.com)

## **C.3 FEEDBACK FORM**

# COMMUNITY FEEDBACK FORM: WELLINGTON SOLAR FARM

Your feedback is important to develop a solar farm project that best suits the local area and community.

Your comments ensure local feedback is understood by the developers and assessment team.

Please send your feedback to (or seek further information directly, from):

Anna Cain, First Solar Australia Pty Ltd  
Level 3 16 Spring Street, Sydney, NSW 2000  
[wellingtonsolarfarm@firstsolar.com](mailto:wellingtonsolarfarm@firstsolar.com)

For further information about the project, please see the project website at [www.wellingtonsolarfarm.com.au](http://www.wellingtonsolarfarm.com.au)

**Your contact details: (this information will be treated as confidential)**

Name: ..... Address: ..... Ph: .....

**Circle which best describes how far you live from the proposed Wellington Solar Farm:**

<1 km      1-2 km      2-5 km      >5 kilometres      Not a member of the local community

**Tell us what you value about the local area:**

What do you value most about the local area?

.....  
.....  
.....  
.....

What views or landscape characteristics in the region and local area are important to you?

.....  
.....  
.....  
.....

What do you like about solar farms?

.....  
.....  
.....  
.....

Do you have any concerns about solar farms?

.....  
.....  
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.....

Do you have any specific concerns regarding the proposed solar farm at Wellington?

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