

19 March 2020

NSW Department of Planning, Industry and Environment
Attn: Mr. Javier Canon
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Mr. Canon,

**Wellington Solar Farm Modification 2 (SSD 8573 Mod 2)
Response to Request for Information**

In response to the Department of Planning, Industry and Environment's requests for additional information in relation to the Wellington Solar Farm Modification 2 (SSD 8573 Mod 2) dated the 6th and 13th of March 2020, please find below responses to the clarifications requested, as well as attached:

- a revised Biodiversity Assessment Report (BDAR), dated March 2020; and
- the proposed project layout.

Aboriginal Cultural Heritage

In response to the comment raised by BCD in its correspondence dated 25 February 2020 regarding Wellington Solar Isolated Find 1 (IF 1), it is confirmed IF1 would be avoided, demarcated and a 5 m buffer maintained around the site to ensure no inadvertent impacts occur in accordance with the Project's Cultural Heritage Management Plan.

Transport

While an additional 60,714 PV panels would be transported to site with the proposed modified project layout, the original traffic estimates were conservative and adequately account for the transport of this additional infrastructure to site, particularly as the number of inverters to be transported to site has decreased. The estimated traffic movements will not increase from that originally proposed.

Biodiversity

A new revision of the BDAR has been issued in response to the three BDAR specific comments raised by BCD in its correspondence dated 25 February 2020. Refer to the attached revised BDAR and the below summary of how each of their comments has been specifically addressed.

1.1 Further consideration be given to excluding the gang-gang cockatoo and superb parrot as species credit species in accordance with section 6.4.1.3 of the Biodiversity Assessment Method (BAM).

The gang-gang cockatoo and superb parrot have now been excluded as species credit species in accordance with section 6.4.1.3 of the Biodiversity Assessment Method (BAM). The net credit requirement is summarised in Table 1.

Table 1: Net Biodiversity Credit Requirement

Plant Community Type (PCT) and Structure	Condition	Credits
PCT 266 Planted Woodland	Moderate to good condition	1
PCT 266 Woodland	Moderate to good condition (hollow bearing trees present)	2
Species Credit Species		Credits
Pink-tailed Legless Lizard (<i>Aprasia parapulchella</i>)		2



1.2 An additional SAIL assessment for White Box – Yellow Box – Blakely’s Red Gum EEC should be conducted in accordance with section 10.2.2 of the BAM.

An additional SAIL assessment for White Box – Yellow Box – Blakely’s Red Gum EEC has been undertaken in accordance with section 10.2.2 of the BAM. Refer to below as outlined in Section 9 of the revised BDAR.

‘The principles used to determine if a development will have serious and irreversible impacts, include impacts that:

1. Will cause a further decline of the species or ecological community that is currently observed, estimated, inferred, or reasonably suspected to be in a rapid rate of decline, or
2. Will further reduce the population size of the species or ecological community that is currently observed, estimated, inferred, or reasonably suspected to have a very small population size, or
3. Impact on the habitat of a species or ecological community that is currently observed, estimated, inferred, or reasonably suspected to have a very limited geographic distribution, or
4. Impact on a species or ecological community that is unlikely to respond to measures to improve habitat and vegetation integrity and is therefore irreplaceable.

The following relevant TEC has SAIL potential:

- White Box Yellow Box Blakely’s Red Gum Woodland.

Areas that comprise White Box Yellow Box Blakely’s Red Gum Woodland EEC, have been excluded from the development footprint as much as possible. Specifically, all White Box Yellow Box Blakely’s Red Gum Woodland listed as Critically Endangered Ecological Community (CEEC) under the EPBC Act, has been excluded from the development footprint. However, there is a small area of White Box Yellow Box Blakely’s Red Gum Woodland EEC listed under the BC Act present within the benching and cabling for the substation. See Figure 3-3 of the revised BDAR.

The impacted area around the substation comprises:

- 0.39 ha of BC Act listed EEC that was assessed under the SSD/MOD 1 approvals and is considered an impact consistent with the existing approval.
- 0.03 ha of BC Act listed EEC that is additional to that assessed under the SSD/MOD 1 approvals.
- 0.29 ha of BC Act listed EEC that is to be excised from that assessed under SSD/MOD 1 approvals and will no longer be impacted.

In summary the impacts to EEC of the proposed development (MOD 2) are less than that originally approved under SSD/MOD1 approvals as a larger area would be excised than would be added in this MOD 2 layout.

Principle 1 (above) is the reason that White Box Yellow Box Blakely’s Red Gum Woodland has been listed as Endangered under NSW BC Act and as a SAIL. It has had a drastic reduction in area across its range and therefore has become highly fragmented. It is estimated that less than 4% is remaining in the NSW South Western Slopes and Southern Tablelands (OEH 2011). The following addresses that required under the BAM section 10.2.3 for impacts to an SAIL entity:

a) the action and measures taken to avoid the direct and indirect impact on the potential entity for an SAIL

Management actions have been put in place to avoid and minimise impacts to White Box Yellow Box Blakely’s Red Gum Woodland. These include:



- Clearing protocols, which involve clear marking of impact areas to avoid unintended impacts White Box Yellow Box Blakely's Red Gum Woodland.
- Temporary fencing to prevent impacts to riparian zones.
- Staged clearing to minimise impacts to EEC to be retained.
- Hygiene protocols to avoid introduction or spread of weeds within EEC/CEEC to be retained.

b) the area (ha) and condition of the TEC to be impacted directly and indirectly impacted by the proposed development. The condition of the TEC is to be represented by the vegetation integrity score for each vegetation zone.

A total of 0.42 ha of White Box Yellow Box Blakely's Red Gum Woodland is to be impacted on the site (this includes 0.03 ha of additional impact, from MOD 1 and 0.39 ha of consistent impact already approved SSD/MOD1). The 0.42 ha of White Box Yellow Box Blakely's Red Gum Woodland is composed of:

- 0.4 ha of Zone 5 PCT 266 Box Gum Woodland derived grassland (moderate to good) with a current vegetation integrity score of 30.
- 0.02 ha of Zone 2 PCT 266 Box Gum Woodland planted (moderate to good) with a current vegetation integrity score of 12.3.

This 0.42 ha area of impact is less than what was approved under SSD/MOD1 approval.

c) the extent to which the impact exceeds any threshold for the potential entity that is specified in the Guidance to assist a decision-maker to determine a serious and irreversible impact.

No thresholds are currently specified for this EEC.

d) The extent and overall condition of the TEC within an area of 1000 ha, and then 10,000 ha, surrounding the development footprint.

Within a 1,000 ha area of the site and surrounds there are two PCTs present that are associated with Box Gum Woodland:

- White Box grassy woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion PCT 266
- Blakely's Red Gum - Yellow Box grassy tall woodland of the NSW South Western Slopes Bioregion PCT 277

A total of 219 ha of Box Gum Woodland exists within 1,000 ha radius from the centre of the site. This equates to 22% of the 1000 ha area, of this 0.42 ha will be removed which is 0.19%.

Within a 10,000 ha area of the site and surrounds there are six PCTs present that are associated with Box Gum Woodland:

- Yellow Box - River Red Gum tall grassy riverine woodland of NSW South Western Slopes Bioregion and Riverina Bioregion PCT 74
- White Box grassy woodland in the upper slopes sub-region of the NSW South Western Slopes Bioregion PCT 266
- White Box - White Cypress Pine - Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion PCT 267
- White Box - Blakely's Red Gum - Long-leaved Box - Nortons Box - Red Stringybark grass shrub woodland on shallow soils on hills in the NSW South Western Slopes Bioregion PCT 268
- Blakely's Red Gum - Yellow Box grassy tall woodland of the NSW South Western Slopes Bioregion PCT 277



- Derived grassland of the NSW South Western Slopes PCT 796

A total of 1,393 ha of Box Gum Woodland exists within 10,000 ha radius from the centre of the site (refer Footnote 1 in the revised BDAR). This equates to 14% of the total area, of this 0.42 ha will be removed which is 0.03%.

e) An estimate of the extant area and overall condition of the potential TEC remaining in the IBRA subregion before and after the impact of the proposed development has been taken into consideration.

As the reduction in Box Gum Woodland is 0.42 ha which is 0.19% loss over 1000 ha it is unlikely to be a significant impact over the IBRA sub region which is 4.6 million hectares and is likely to be a smaller area of Box Gum Woodland than what was identified within 1000 or 10000 ha.

f) An estimate of the area of the candidate TEC that is in the reserve system within the IBRA region and IBRA subregion.

It is unclear how much Box Gum Woodland is preserved in the reserve system, it is considered that is poorly preserved. However, this project will fund or create preservation of Box Gum Woodland following approval and retirement of PCT 266 credits.

g) The development's proposed impacts on:

- Abiotic factors critical to the long-term survival of the potential TEC*

The development is considered to have negligible impacts on abiotic factors. The Solar Farm has minimal soil disturbance and low levels of indirect impacts on soil, air and water. In addition, the proposed development is not going to impact upon abiotic processes outside of the development that could impact upon existing Box Gum Woodland either nearby or downstream or in groundwater connected areas.

- Characteristic and functionally important species through impacts such as, but not limited to, inappropriate fire/flooding regimes, removal of understorey species or harvesting of plants*

This is not applicable. All potential impacts have been considered through the SSD approval process.

- The quality and integrity of an occurrence of the potential TEC through threats and indirect impacts*

The Box Gum Woodland that remains onsite will be mostly undisturbed through direct impacts. Measures will be undertaken to ensure indirect impacts are minimised. These include weed management, vegetation clearance protocols, avoidance of fertiliser and herbicide drift. The Biodiversity Management Plan, Vegetation Management Plan will ensure management and monitoring of the existing Box Gum Woodland to ensure it is protected and improved.

h) Direct or indirect fragmentation and isolation of an important area of the potential TEC.

The area is already highly fragmented, the development is not causing further fragmentation that will significantly impact upon the Box Gum Woodland.

i) The measures proposed to contribute to the recovery of the potential TEC in the IBRA subregion.

A Vegetation Management Plan has been developed to direct and support replanting of Box Gum Woodland species and manage existing Box Gum Woodland within the development site. The affect of



MOD 2 is to reduce the amount of clearing of this TEC. As such, following the above assessment against SAI criteria, it is believed that the Wellington Solar Farm development, will not have a risk of Serious and Irreversible Impact for White Box Yellow Box Blakely's Red Gum Woodland.

No species established as having potential habitat onsite or likely to be impacted by the proposed development has SAI potential.'

1.3 The BDAR should be certified, and the credit calculations in the BAM calculator should be finalised.

The BDAR has been certified (refer to the 'Document Verification' page located after the cover page of the revised BDAR). The credit calculations in the BAM calculator have been finalised, as per Table 1 above. Refer to Appendix C of the revised BDAR.

Thank you and feel free to contact me on 0409 691 473 if you have any questions.

Kind regards,



Diana Mitchell
Principal Environmental Planner

ENCL:

- Wellington SF_Mod 2_Revised BDAR
- Wellington SF_Mod 2_Project Layout