



Mr Robert Ibrahim  
Photon Energy Engineering Australia Pty Ltd  
204/55 Grafton Street  
Bondi Junction NSW 2022

Dear Mr Ibrahim

**Suntop Solar (SSD 8696)  
Environmental Assessment Requirements**

I have attached the Environmental Assessment Requirements for the preparation of an Environmental Impact Statement (EIS) for the Suntop Solar Farm.

The requirements are based on the information you have provided to date, and have been prepared in consultation with the relevant government agencies. The agencies comments are attached for your information (see Attachment 2).

Please note that the Department may alter these requirements at any time, and that you must consult further with the Department if you do not lodge a development application and EIS for the project within the next two years.

If your proposal contains any actions that could have a significant impact on matters of National Environmental Significance, then it will also require approval under the Commonwealth's *Environment Protection Biodiversity Conservation Act 1999* (EPBC Act).

This approval is in addition to any approvals required under NSW legislation. If you have any questions about the application of the EPBC Act to your proposal, you should contact the Department of the Environment in Canberra (6274 1111 or [www.environment.gov.au](http://www.environment.gov.au)).

Please contact the Department at least two weeks before you plan to submit the development application and EIS for the project. This will enable the Department to:

- confirm the applicable fee (see Division 1AA, Part 15 of the *Environmental Planning and Assessment Regulation 2000*); and
- determine the required number of copies of the EIS.

It is important for you to recognise that the Department will review the EIS for the project before putting it on public exhibition. If it fails to adequately address these requirements, you will be required to submit an amended EIS.

Yours sincerely

Clay Preshaw

**Director**

**Resource & Energy Assessments**

as nominee of the Secretary

# Environmental Assessment Requirements

## State Significant Development

Section 78A(8A) of the *Environmental Planning and Assessment Act 1979*

<b>Application Number</b>	SSD 8696
<b>Proposal</b>	Suntop Solar Project which includes: <ul style="list-style-type: none"><li>the construction and operation of a photovoltaic (PV) generation facility with an estimated capacity of 220 MW; and</li><li>associated infrastructure, including a grid connection</li></ul>
<b>Location</b>	909 Suntop Road, Suntop
<b>Applicant</b>	Photon Energy Pty Ltd
<b>Date of Issue</b>	21 September 2017
<b>General Requirements</b>	<p>The Environmental Impact Statement (EIS) for the development must comply with the requirements in Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i>.</p> <p>In particular, the EIS must include:</p> <ul style="list-style-type: none"><li>a stand-alone executive summary;</li><li>a full description of the development, including:<ul style="list-style-type: none"><li>details of construction, operation and decommissioning;</li><li>a site plan showing all infrastructure and facilities (including any infrastructure that would be required for the development, but the subject of a separate approvals process);</li><li>a detailed constraints map identifying the key environmental and other land use constraints that have informed the final design of the development;</li></ul></li><li>a strategic justification of the development focusing on site selection and the suitability of the proposed site;</li><li>an assessment of the likely impacts of the development on the environment, focusing on the specific issues identified below, including:<ul style="list-style-type: none"><li>a description of the existing environment likely to be affected by the development;</li><li>an assessment of the likely impacts of all stages of the development (which is commensurate with the level of impact), including any cumulative impacts, taking into consideration any relevant legislation, environmental planning instruments, guidelines, policies, plans and industry codes of practice;</li><li>a description of the measures that would be implemented to avoid, mitigate and/or offset the impacts of the development (including draft management plans for specific issues as identified below); and</li><li>a description of the measures that would be implemented to monitor and report on the environmental performance of the development;</li></ul></li><li>a consolidated summary of all the proposed environmental management and monitoring measures, identifying all the commitments in the EIS; and</li><li>the reasons why the development should be approved having regard to:<ul style="list-style-type: none"><li>relevant matters for consideration under the <i>Environmental Planning and Assessment Act 1979</i>, including the objects of the Act and how the principles of ecologically sustainable development have been incorporated in the design, construction and ongoing operations of the development;</li><li>the suitability of the site with respect to potential land use conflicts with existing and future surrounding land uses; and</li><li>feasible alternatives to the development (and its key components), including the consequences of not carrying out the development.</li></ul></li></ul>

	<p>While not exhaustive, Attachment 1 contains a list of some of the environmental planning instruments, guidelines, policies, and plans that may be relevant to the environmental assessment of this development.</p> <p>In addition to the matters set out in Schedule 1 of the <i>Environmental Planning and Assessment Regulation 2000</i>, the development application must be accompanied by:</p> <ul style="list-style-type: none"> <li>• a signed report from a suitably qualified person that includes an accurate estimate of the capital investment value of the development (as defined in Clause 3 of the <i>Environmental Planning and Assessment Regulation 2000</i>), including details of all the assumptions and components from which the capital investment value calculation is derived; and</li> <li>• the consent in writing of the owner of the land (as required in clause 49(1)(b) of the <i>Environmental Planning and Assessment Regulation 2000</i>).</li> </ul>
<p><b>Specific Issues</b></p>	<p>The EIS must address the following specific issues:</p> <p><b>Biodiversity</b> – including an assessment of the biodiversity values and the likely biodiversity impacts of the project in accordance with the <i>Biodiversity Conservation Act 2016</i> (NSW), a detailed description of the proposed regime for minimising, managing and reporting on the biodiversity impacts of the project over time, and a strategy to offset any residual impacts of the project in accordance with the <i>Biodiversity Conservation Act 2016</i> (NSW);</p> <ul style="list-style-type: none"> <li>• <b>Heritage</b> – including an assessment of the likely Aboriginal and historic heritage (cultural and archaeological) impacts of the development, including adequate consultation with the local Aboriginal community;</li> <li>• <b>Land</b> – including an assessment of the impact of the development on agricultural land (including an investigation of the potential for dryland salinity), flood prone land and the karst landscape, a soil survey to consider the potential for erosion to occur, and paying particular attention to the compatibility of the development with the existing land uses on the site and adjacent land (e.g. operating mines, extractive industries, mineral or petroleum resources, exploration activities, aerial spraying, dust generation, and risk of weed and pest infestation) during operation and after decommissioning, with reference to the zoning provisions applying to the land;</li> <li>• <b>Visual</b> – including an assessment of the likely visual impacts of the development (including any glare, reflectivity and night lighting) on surrounding residences, scenic or significant vistas, air traffic and road corridors in the public domain, including a draft landscaping plan for on-site perimeter planting, with evidence it has been developed in consultation with affected landowners;</li> <li>• <b>Noise</b> – including an assessment of the construction noise impacts of the development in accordance with the <i>Interim Construction Noise Guideline</i> (ICNG) and operational noise impacts in accordance with the <i>NSW Industrial Noise Policy</i> (INP), and a draft noise management plan if the assessment shows construction noise is likely to exceed applicable criteria;</li> <li>• <b>Transport</b> – including an assessment of the site access route (Suntop Road, Renshaw McGirr Way and Mitchell Highway), site access points, and likely transport impacts (including peak and average traffic generation) of the development on the capacity and condition of roads (including on any Crown land), a description of the measures that would be implemented to mitigate any impacts during construction, and a description of any proposed road upgrades developed in consultation with the relevant road and rail authorities (if required);</li> <li>• <b>Water</b> – including: <ul style="list-style-type: none"> <li>– an assessment of the likely impacts of the development (including flooding) on surface water (including the unnamed stream crossing the</li> </ul> </li> </ul>

	<p>site) and groundwater resources, wetlands, riparian land, groundwater dependent ecosystems, aquatic ecology, and acid sulfate soils), related infrastructure, adjacent licensed water users and basic landholder rights, and measures proposed to monitor, reduce and mitigate these impacts;</p> <ul style="list-style-type: none"> <li>– details of water requirements and supply arrangements; and</li> <li>– a description of the erosion and sediment control measures that would be implemented to mitigate any impacts in accordance with <i>Managing Urban Stormwater: Soils &amp; Construction</i> (Landcom 2004); and</li> </ul> <ul style="list-style-type: none"> <li>• <b>Hazards and Electromagnetic Interference</b> – an assessment of potential hazards and risks associated with bushfires and the proposed transmission line and substation against the International Commission on Non-Ionizing Radiation Protection (ICNIRP) <i>Guidelines for limiting exposure to Time-varying Electric, Magnetic and Electromagnetic Fields</i>.</li> </ul>
<b>Consultation</b>	<p>During the preparation of the EIS, you should consult with relevant local, State or Commonwealth Government authorities, infrastructure and service providers, community groups, affected landowners, exploration licence holders, quarry operators and mineral title holders.</p> <p>In particular, you must undertake detailed consultation with affected landowners surrounding the development and Dubbo Regional Council.</p> <p>The EIS must describe the consultation that was carried out, identify the issues raised during this consultation, and explain how these issues have been addressed in the EIS.</p>
<b>Further consultation after 2 years</b>	<p>If you do not lodge a development application and EIS for the development within 2 years of the issue date of these EARs, you must consult further with the Secretary in relation to the preparation of the EIS.</p>

## ATTACHMENT 1

### Environmental Planning Instruments, Policies, Guidelines & Plans

#### Biodiversity

Biodiversity Assessment Method (OEH)  
 Threatened Species Assessment Guidelines - Assessment of Significance (OEH)  
 Biosecurity Act 2015  
 Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (DPI)  
 Policy and Guidelines for Fish Habitat Conservation and Management (DPI)

#### Heritage

Aboriginal Cultural Heritage Consultation Requirements for Proponents (OEH)  
 Code of Practice for Archaeological Investigations of Objects in NSW (OEH)  
 Guide to investigating, assessing and reporting on aboriginal cultural heritage in NSW (OEH).  
 NSW Heritage Manual (OEH)

#### Land

Primefact 1063: Infrastructure proposals on rural land (DPI)  
 Establishing the social licence to operate large scale solar facilities in Australia: insights from social research for industry (ARENA)  
 Local Land Services Act 2013  
 Australian Soil and Land Survey Handbook (CSIRO)  
 Guidelines for Surveying Soil and Land Resources (CSIRO)  
 The land and soil capability assessment scheme: second approximation (OEH)

#### Noise

NSW Industrial Noise Policy (EPA)  
 Interim Construction Noise Guideline (EPA)  
 NSW Road Noise Policy (EPA)

#### Lighting

Dark Sky Planning Guideline: Protecting the observing conditions at Siding Spring (DPE)

#### Transport

Guide to Traffic Generating Developments (RTA)  
 Road Design Guide (RMS) & relevant Austroads Standards  
 Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development

#### Water

Managing Urban Stormwater: Soils & Construction (Landcom)  
 Floodplain Development Manual (OEH)  
 Guidelines for Controlled Activities on Waterfront Land (DPI Water)  
 Water Sharing Plans (DPI Water)  
 Floodplain Management Plan (DPI Water)  
 Guidelines for Watercourse Crossings on Waterfront Land (DPI Water)

#### Waste

Waste Classification Guidelines (EPA)

#### Electromagnetic Interference

ICNIRP Guidelines for limiting exposure to Time-varying Electric, Magnetic and Electromagnetic Fields

#### Environmental Planning Instruments

State Environmental Planning Policy (State and Regional Development) 2011

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State Environmental Planning Policy (Infrastructure) 2007

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State Environmental Planning Policy (Rural Lands) 2008

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State Environmental Planning Policy No. 44 – Koala Habitat Protection

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State Environmental Planning Policy No. 55 – Remediation of Land

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Wellington Local Environmental Plan 2012

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Parcel 44877  
dtq:D

Your ref: SSD 8696

20 September 2017



Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Hawkeswood

**RE: State Significant Development 8696  
Lots 1, 2 & 3 DP 506925, Lot 122 DP 753238 & Lot 90 DP 657805,  
No.909 Suntop Road, Suntop**

I refer to the Department's email dated 30 August 2017, inviting comments on the Preliminary Environmental Assessment (PEA) prepared by Pitt & Sherry for the proposed solar farm located at the abovementioned property.

The following comments are provided to assist in the preparation of the SEARs:

- The Department's email and the Environmental Assessment Requirements (EAR) state that the proposal has an estimated capacity of 220MW, when the PEA states 260MW.
- The EAR has the address of the property as 909 Suntop Toad, obviously a typing error. A legal description perhaps should refer to the various lots and deposited plans.
- The EAR refers to consultation with Upper Lachlan Shire Council. This shall be corrected to read - Dubbo Regional Council.
- Attachment 1 – Environmental Planning Instruments, doesn't reference the Environmental Planning and Assessment (EP&A) Act, 1979, the Environmental Planning and Assessment (EP&A) Regulation, 2000 or Wellington Local Environmental Plan (WLEP) 2012.
- The PEA and the Department's email continually refers to the site being 20 km from Wellington. This is true via road, but really about 10km straight line.
- The PEA refers to Wellington LGA (2.1). This shall be corrected to read - Dubbo Regional Council LGA.



All communications to: **THE GENERAL MANAGER**

**ABN 53 539 070 928**

PO Box 81 Dubbo NSW 2830

**T** (02) 6801 4000 **F** (02) 6801 4259 **E** [council@dubbo.nsw.gov.au](mailto:council@dubbo.nsw.gov.au)

Civic Administration Building Church St Dubbo NSW 2830

**W** [dubbo.nsw.gov.au](http://dubbo.nsw.gov.au)



- The PEA (Figure 2-2) shows a watercourse through the site and section 2.2 identifies that development “... will avoid the existing surface water bodies on the site where possible including a buffer of 40m between infrastructure and any waterway.” As such, the proposal may be designated as per S91 Integrated Development, EP&A Act, 1979. The NSW Office of Water should be contacted to provide advice accordingly.
- The PEA makes constant reference to a layout plan (Appendix A), but no layout plan of the proposed/likely/indicative footprint of the proposed panels has been provided. Consequently, it is not known what proportion of the site will be taken-up with the proposed 787,892 PV panels, their set-backs from creek lines and existing overhead powerlines and easements.

The absence of a layout/site plan also means that the provisions of access perimeter roads are not identified to permit servicing of the on-site infrastructure and security fencing.

The Department may need to consider the legality of seeking stakeholder input into the preparation of the SEARs, without providing this crucial information, which may bring any approval into question and expose the Department and the applicant to subsequent appeals.

- The PEA in section 2.4.1 makes reference to the solar farm’s construction in “... 1ha stages – with up to 10 stages ...”. Given recent issues regarding ‘staged development’ and S83 of the EP&A Act, this terminology needs to be clarified.
- The PEA in Table 2-2 Key Components of Proposal, refers to 2 x 40’ shipping containers for storage and maintenance equipment. Council is not generally supportive of shipping containers, but further details regarding location, screening, footings, etc., may resolve such concerns.
- The PEA in section 2.4.7 relates to decommissioning of the site. While Council endorses the intention to decommission the site, the question arises as to how is this achieved, how is this enforced? Council may be unaware that a site is closing down and the site could be left in poor condition, especially for agricultural pursuits.
- The PEA in section 3.2 relates to alternative locations, but no details are provided.
- The PEA in section 5.1.4 WLEP 2012, states that the proposal “... can be considered a sustainable primary industry that extracts renewal energy (a natural resource)”. A solar farm is not a ‘primary industry’.
- The PEA in section 5.1.4 states that “electricity generation is not listed among developments which are permitted with consent for the zone ...”. It should be noted that WLEP 2012 doesn’t list *electricity generating works* in the land use zones, as directed by a Department of Planning circular to all local councils, some years ago.



- The PEA fails to note that the site is deemed to be high-moderately high with regard to groundwater, as per WLEP 2012 clause 6.4 Groundwater vulnerability.
- The PEA in section 5.1.5 refers to the Threatened Species Conservation Act 1995 and the Native Vegetation Act 2003, both of which were recently repealed. Council is also unsure why SEPP 33 Hazardous and Offensive Development is listed.
- Whilst the subject property may not be mapped as being Bush Fire Prone Land, the land will still be at risk of bushfires by virtue of its existing grassland vegetation. As is evident in the NSW version of the Building Code of Australia and commentary in Planning for Bush Fire Protection 2006, bushfire hazard exposure is not reliant upon the mapping by the NSWRFCS Commissioner.

Consequently, bushfire exposure needs to be addressed. In this regard it is expected that a minimum 10m fire break would be provided around the perimeter of the development and appropriate water storage provided on-site for use by the NSW Rural Fire Service.

It is expected that the setback requirements specified under clause 45 of the Infrastructure SEPP will be addressed and that the fire radiant heat exposure and explosion setbacks imposed by the NSW electrical utility operators will be addressed for the facility's substations.

- The Dark Skies Guidelines have not been addressed or mentioned in the submission despite the site being located within the Siding Spring Observatory's Dark Sky Region (ie. within 200 km of the observatory). This Dark Sky Region applies to State Significant Development and invokes clause 92 of the Environmental Planning and Assessment Regulation, 2000.
- The PEA makes no mention of State Environmental Planning Policy (Rural Lands) 2008. Whilst this proposal does not involve the subdivision of land or the erection of a dwelling on the subject RU1 land, it will remove prime agricultural land from production. Consequently, it would seem appropriate that any assessment should consider the proposed development in terms of the Aims and Planning Principles outlined under such SEPP, at least for the purposes of Section 79C of the Act.
- With regard to road infrastructure, Council would expect the Environmental Impact Statement (EIS) to address:
  - a breakdown of vehicles by type, specifying gross vehicle mass, vehicle length and expected daily volumes travelling to the site; and
  - the capacity of the construction phase to accommodate curfew periods of travel on Suntop Road by 'restricted access vehicles' to ensure traffic safety of school buses and the like.
- Given the proposal foreshadows up to 40 x B-Double movements per day during construction, a Dilapidation Report on Suntop Road shall be provided.

- The intersection of Suntop Road and Renshaw McGirr Way is very marginal for B-Double access. Given the numbers of movements proposed, this could trigger upgrading of the intersection.
- Travelling of these vehicles through the Curra Creek gorge on Renshaw McGirr Way will require some traffic safety related Safe Work Method Statement by Restricted Access Vehicle operators.
- A cursory inspection of the site revealed a ridge line about 500 metres south of Suntop Road. Ideally, the solar farm could be located on the southern side of the ridge line, which would effectively screen the entire enterprise from any passing traffic along Suntop Road. However, given no layout plan was provided, this remains unknown.

If you have any enquiries in this matter, please do not hesitate to contact Council's Statutory Planning Services Team Leader, Darryll Quigley, during normal office hours, on 6801 4000.

Yours faithfully

*Stephen Wallace*  
Manager Building and Development Services



## Department of Primary Industries

OUT17/35970

Ms Rose-Anne Hawkeswood  
Senior Planning Officer | Resource Assessments  
NSW Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

[Rose-Anne.Hawkeswood@planning.nsw.gov.au](mailto:Rose-Anne.Hawkeswood@planning.nsw.gov.au)

Dear Ms Hawkeswood

### **Suntop Solar Farm (7955) Request for Secretary's Environmental Assessment Requirements**

I refer to your email of 29 August 2017 to the Department of Primary Industries (DPI) in respect to the above matter. Comment has been sought from relevant branches of DPI. Views were also sought from NSW Department of Industry - Lands that are now a division of the broader Department and no longer within NSW DPI. Any further referrals to DPI can be sent by email to [landuse.enquiries@dpi.nsw.gov.au](mailto:landuse.enquiries@dpi.nsw.gov.au).

DPI has reviewed the Preliminary Environmental Assessment and draft SEARS and provides the following recommendations for matters to be addressed in the Environmental Impact Statement (EIS) for the proposal, with further detail at **Attachment A**.

#### **Land**

The SEARs should include a specific request for greater detail and exploration of:

- The potential at this site for dryland salinity outbreaks.
- Any potential impacts from the project to the nearby karst environment.
- The potential for the site to continue to be used for agricultural purposes during the operation of the solar farm.

Yours sincerely

Mitchell Isaacs  
**Director, Planning Policy & Assessment Advice**  
13 September 2017

*DPI appreciates your help to improve our advice to you. Please complete this three minute survey about the advice we have provided to you, here:*  
<https://goo.gl/o8TXWz>

## **Attachment A**

### ***Suntop Solar Farm (7955)*** **Request for Secretary's Environment Assessment Requirements** **Detailed comments – DPI Agriculture**

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The SEARs supplied indicate that the impacts on the land, especially in relation to initial soil investigations and impacts regarding construction and use are included for assessment. However further considerations include:

1. The site is an area that has been subject to dryland salinity outbreaks, and a karst occurrence is also close by. It is an area that supports cropping and grazing so the agricultural value of the land should be confirmed through a soil survey which will also provide a basis for this and to be continued to be used for:
  - an agricultural purpose during the operation of the solar farm, and
  - its ability to be returned back to agricultural production at final rehabilitation on closure of this operation.
  - Its management if impacting on the karst environment.
2. Attention to the need to develop Rehabilitation and Decommissioning/Closure Management Plans that outlines the rehabilitation objectives and strategies. This includes, but is not limited to:
  - describing the design criteria of the final land use and landform
  - indicators to guide the return of the land back to agricultural production.
  - monitoring and mitigation measures to be adopted for rehabilitation remedial actions, and
  - commitment to burying cables and pipes to a depth >500mm on any land with a cropping history or land with a capability for cropping to allow greater opportunity for agricultural activities to continue above the cables. This is a particular issue for the cables/pipes which will be left in situ once restoration is complete.
3. The current agricultural value of the site is quantified, and the anticipated use of the site during the operation of the solar farm is also assessed

**End Attachment A**

Rose-Anne Hawkeswood  
Senior Planning Officer  
Resource Assessments - Planning Services Division  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

[Rose-Anne.Hawkeswood@planning.nsw.gov.au](mailto:Rose-Anne.Hawkeswood@planning.nsw.gov.au)

Dear Rose-Anne

**Suntop Solar Farm Project (SSD8696)**  
**Request for Secretary's Environmental Assessment Requirements (SEARs)**

I refer to your email dated 30 August 2017 inviting the Division of Resources & Geoscience (the Division) to provide comments on the Suntop Solar Project (the Project) SEARs submitted by Photon Energy SPV 8 Pty Ltd (the Proponent).

The Division has reviewed the adequacy of information supplied relation to the abovementioned Project and provides the following advice:

With regard to the **Specific Issues**; Land requirements of the Draft SEARs, the proponent is required to:

- Identify on a locality or constraints map, the current Exploration Licence 8463 (Act 1992) (EL 8463) held by Lachlan Resources Pty Ltd (Lachlan Resources). The title must be shown in relation to the proposed solar farm project boundary, electricity transmission infrastructure and any biodiversity offset areas (refer Figure 1).

Titles searches should be undertaken prior to finalisation of the Environmental Impact Statement (EIS), with the search date noted. Current mineral authorities and applications can be viewed at:

<http://www.resourcesandenergy.nsw.gov.au/miners-and-explorers/geoscience-information/services/online-services/minview>

<http://www.resourcesandenergy.nsw.gov.au/landholders-and-community/common-ground>

With regard to the **Consultation** requirements of the Draft SEARs, the proponent is required to:

- Consult with Lachlan Resources to establish if the proposal is likely to have a significant impact on current or future mineral exploration, including by limiting access to, or impeding assessment of, those resources, and any way the proposed development may be incompatible with any obligations of the titleholder under the *Mining Act 1992* and associated regulations.

This should include a letter of notification of the proposal to the title holder, and a letter of response from the title holder to the proponent, addressing the above considerations, and documented in full in the EIS. To assist the proponent, the Division provides the following contact details:

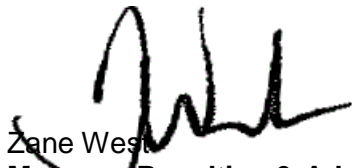
Lachlan Resources Pty Ltd  
PO Box 1573  
WEST PERTH WA 6872

Should biodiversity offsets be considered for the project, the Division requires consultation with the Geological Survey of NSW to ensure there are no potential sterilisation impacts to resources.

Should you have any enquires regarding this matter please contact:

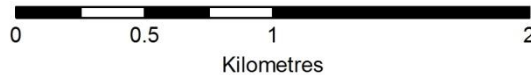
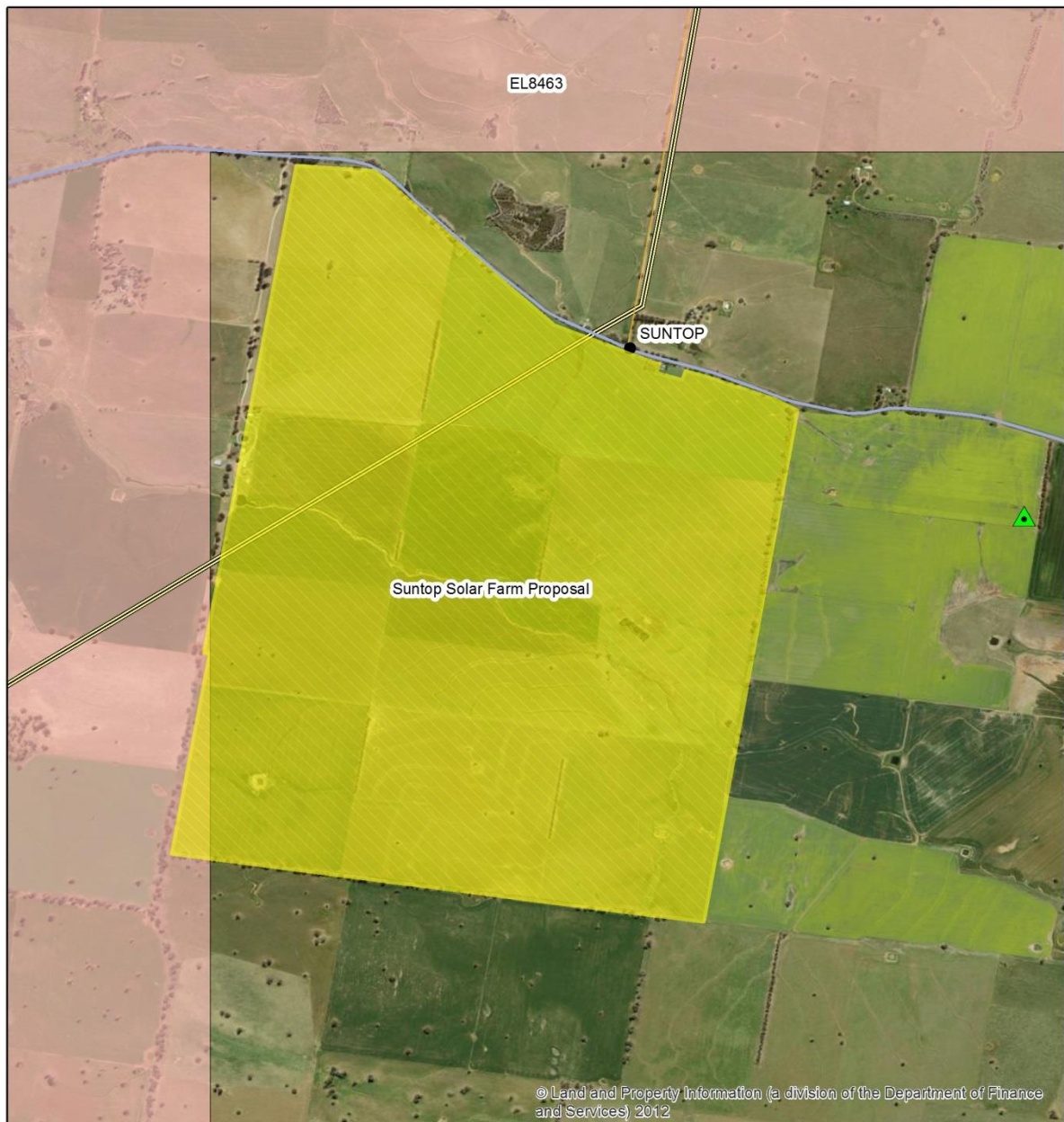
Adam Banister, Acting Senior Advisory Officer, Royalties & Advisory Services at (02) 4931 6439 or [adam.banister@industry.nsw.gov.au](mailto:adam.banister@industry.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to be 'Zane West', written over a horizontal line.

Zane West  
**Manager Royalties & Advisory Services**  
13 September 2017

# Suntop Solar Farm Proposal



Map produced by LUTA 2017

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- Town
- ▲ Industrial Mineral Occurrence
- Highway
- Minor Road
- Local Road
- Electricity Transmission Line
- Current Mineral Titles
- Suntop Solar Proposal



**Planning & Environment**  
Resources & Geoscience

Figure 1: Suntop Solar Farm Proposal





Office of  
Environment  
& Heritage

DOC17/466435  
SSD 8696

Ms Rose-Anne Hawkeswood  
Senior Planning Officer  
Resource Assessments  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Hawkeswood

**Suntop Solar Farm – SSD 8696**

I refer to your email dated 30 August 2017 seeking input into the Department of Planning and Environment Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Assessment (EIS) for the Suntop Solar Farm (SSD 8696).

OEH has considered your request and provides SEARs for the proposed development in **Attachments A and B**.

OEH recommends the EIS needs to appropriately address the following:

1. Biodiversity and offsetting
2. Aboriginal cultural heritage
3. Historic heritage
4. Water and soils
5. Flooding

Please note that for projects **not** defined as pending or interim planning applications under Part 7 of the *Biodiversity Conservation (Savings and Transitional) Regulation 2017* the Biodiversity Assessment Method (BAM) **must** be used to assess impacts to biodiversity in accordance with the *Biodiversity Conservation Act 2016* (BC Act). For this project the BAM **must** be used.

If you have any questions regarding this matter further please contact Michelle Howarth on 02 6883 5339 or email [michelle.howarth@environment.nsw.gov.au](mailto:michelle.howarth@environment.nsw.gov.au).

Yours sincerely

**PETER CHRISTIE**  
**Director North West**  
**Regional Operations Division**



18 September 2017

Contact officer: MICHELLE HOWARTH  
6883 5339

Attachment A - Environmental Assessment Requirements

Attachment B - Guidance Material

## ATTACHMENT A

# Standard Environmental Assessment Requirements

## Suntop Solar Farm (SSD 8696)

<p><b>Biodiversity</b></p> <p>1. Biodiversity impacts related to the proposed Suntop Solar Farm are to be assessed in accordance with the Biodiversity Assessment Method and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the Biodiversity Conservation Act 2016 (s 6.12), Biodiversity Conservation Regulation 2017 (s 6.8) and Biodiversity Assessment Method including details of the measures proposed to address the offset obligation as follows;</p> <ul style="list-style-type: none"> <li>• The total number and classes of biodiversity credits required to be retired for the development/project;</li> <li>• The number and classes of like-for-like biodiversity credits proposed to be retired;</li> <li>• The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules;</li> <li>• Any proposal to fund a biodiversity conservation action;</li> <li>• Any proposal to conduct ecological rehabilitation (if a mining project);</li> <li>• Any proposal to make a payment to the Biodiversity Conservation Fund (Fund).</li> </ul> <p>If requesting the application of the variation rules, the BDAR must contain details of what reasonable steps have been taken to attempt to obtain the required like-for-like biodiversity credits.</p> <p>The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under S6.10 of the Biodiversity Conservation Act 2016</p>
<p><b>Aboriginal cultural heritage</b></p> <p>2. The EIS must identify and describe the Aboriginal cultural heritage values that exist across the whole area that will be affected by the Suntop Solar Farm project and document these in the EIS. This may include the need for surface survey and test excavation. The identification of cultural heritage values should be guided by the <a href="#">Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011)</a> and consultation with OEH regional officers.</p> <p>3. Where Aboriginal cultural heritage values are identified, consultation with Aboriginal people must be undertaken and documented in accordance with the <a href="#">Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW)</a>. The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the EIS.</p> <p>4. Impacts on Aboriginal cultural heritage values are to be assessed and documented in the EIS. The EIS must demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the EIS must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must be documented and notified to OEH.</p>
<p><b>Historic heritage</b></p> <p>5. The EIS must provide a heritage assessment including but not limited to an assessment of impacts to <i>State and local heritage</i> including conservation areas, natural heritage areas, places of Aboriginal heritage value, buildings, works, relics, gardens, landscapes, views, trees should be</p>

assessed. Where impacts to State or locally significant heritage items are identified, the assessment shall:

- a. outline the proposed mitigation and management measures (including measures to avoid significant impacts and an evaluation of the effectiveness of the mitigation measures) generally consistent with the NSW Heritage Manual (1996),
- b. be undertaken by a suitably qualified heritage consultant(s) (note: where archaeological excavations are proposed the relevant consultant must meet the NSW Heritage Council's Excavation Director criteria),
- c. include a statement of heritage impact for all heritage items (including significance assessment),
- d. consider impacts including, but not limited to, vibration, demolition, archaeological disturbance, altered historical arrangements and access, landscape and vistas, and architectural noise treatment (as relevant), and
- e. where potential archaeological impacts have been identified develop an appropriate archaeological assessment methodology, including research design, to guide physical archaeological test excavations (terrestrial and maritime as relevant) and include the results of these test excavations.

#### **Water and soils**

6. The EIS must map the following features relevant to water and soils including:
  - a. Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).
  - b. Rivers, streams, wetlands, estuaries (as described in s4.1 of the Biodiversity Assessment Method).
  - c. Wetlands as described in s4.1 of the Biodiversity Assessment Method
  - d. Groundwater.
  - e. Groundwater dependent ecosystems.
  - f. Proposed intake and discharge locations.
7. The EIS must describe background conditions for any water resource likely to be affected by the Suntop Solar Farm project, including:
  - a. Existing surface and groundwater.
  - b. Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations.
  - c. Water Quality Objectives (as endorsed by the NSW Government <http://www.environment.nsw.gov.au/ieo/index.htm>) including groundwater as appropriate that represent the community's uses and values for the receiving waters.
  - d. Indicators and trigger values/criteria for the environmental values identified at (c) in accordance with the [ANZECC \(2000\) Guidelines for Fresh and Marine Water Quality](#) and/or local objectives, criteria or targets endorsed by the NSW Government.
8. The EIS must assess the impacts of the project on water quality, including:
  - a. The nature and degree of impact on receiving waters for both surface and groundwater, demonstrating how the project protects the Water Quality Objectives where they are currently being achieved, and contributes towards achievement of the Water Quality Objectives over time where they are currently not being achieved. This should include an assessment of the

<p>mitigating effects of proposed stormwater and wastewater management during and after construction.</p> <p>b. Identification of proposed monitoring of water quality.</p>
<p>9. The EIS must assess the impact of the project on hydrology, including:</p> <ul style="list-style-type: none"> <li>a. Water balance including quantity, quality and source.</li> <li>b. Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.</li> <li>c. Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.</li> <li>d. Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (eg river benches).</li> <li>e. Changes to environmental water availability, both regulated/licensed and unregulated/rules-based sources of such water.</li> <li>f. Mitigating effects of proposed stormwater and wastewater management during and after construction on hydrological attributes such as volumes, flow rates, management methods and re-use options.</li> <li>g. Identification of proposed monitoring of hydrological attributes.</li> </ul>
<p><b>Flooding and coastal erosion</b></p>
<p>10. The EIS must map the following features relevant to flooding as described in the Floodplain Development Manual 2005 (NSW Government 2005) including:</p> <ul style="list-style-type: none"> <li>a. Flood prone land</li> <li>b. Flood planning area, the area below the flood planning level.</li> <li>c. Hydraulic categorisation (floodways and flood storage areas).</li> </ul>
<p>11. The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 1 in 10 year, 1 in 100 year flood levels and the probable maximum flood, or an equivalent extreme event.</p>
<p>12. The EIS must model the effect of the proposed project (including fill) on the flood behaviour under the following scenarios:</p> <ul style="list-style-type: none"> <li>a. Current flood behaviour for a range of design events as identified in 11 above. This includes the 1 in 200 and 1 in 500 year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.</li> </ul>
<p>13. Modelling in the EIS must consider and document:</p> <ul style="list-style-type: none"> <li>a. The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood.</li> <li>b. Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazards and hydraulic categories.</li> <li>c. Relevant provisions of the NSW Floodplain Development Manual 2005.</li> </ul>
<p>14. The EIS must assess the impacts on the proposed project on flood behaviour, including:</p> <ul style="list-style-type: none"> <li>a. Whether there will be detrimental increases in the potential flood affection of other properties, assets and infrastructure.</li> <li>b. Consistency with Council floodplain risk management plans.</li> <li>c. Compatibility with the flood hazard of the land.</li> </ul>

- d. Compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land.
- e. Whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site.
- f. Whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.
- g. Any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the SES and Council.
- h. Whether the proposal incorporates specific measures to manage risk to life from flood. These matters are to be discussed with the SES and Council.
- i. Emergency management, evacuation and access, and contingency measures for the development considering the full range of flood risk (based upon the probable maximum flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the SES.
- j. Any impacts the development may have on the social and economic costs to the community as consequence of flooding.

## ATTACHMENT B

## Guidance Material

Title	Web address
<b><u>Relevant Legislation</u></b>	
<i>Biodiversity Conservation Act 2016</i>	<a href="https://www.legislation.nsw.gov.au/#/view/act/2016/63/full">https://www.legislation.nsw.gov.au/#/view/act/2016/63/full</a>
<i>Coastal Management Act 2016</i>	<a href="https://www.legislation.nsw.gov.au/#/view/act/2016/20/full">https://www.legislation.nsw.gov.au/#/view/act/2016/20/full</a>
<i>Commonwealth Environment Protection and Biodiversity Conservation Act 1999</i>	<a href="http://www.austlii.edu.au/au/legis/cth/consol_act/epabca1999588/">http://www.austlii.edu.au/au/legis/cth/consol_act/epabca1999588/</a>
<i>Environmental Planning and Assessment Act 1979</i>	<a href="http://www.legislation.nsw.gov.au/maintop/view/inforce/act+203+1979+cd+0+N">http://www.legislation.nsw.gov.au/maintop/view/inforce/act+203+1979+cd+0+N</a>
<i>Fisheries Management Act 1994</i>	<a href="http://www.legislation.nsw.gov.au/maintop/view/inforce/act+38+1994+cd+0+N">http://www.legislation.nsw.gov.au/maintop/view/inforce/act+38+1994+cd+0+N</a>
<i>Marine Parks Act 1997</i>	<a href="http://www.legislation.nsw.gov.au/maintop/view/inforce/act+64+1997+cd+0+N">http://www.legislation.nsw.gov.au/maintop/view/inforce/act+64+1997+cd+0+N</a>
<i>National Parks and Wildlife Act 1974</i>	<a href="http://www.legislation.nsw.gov.au/maintop/view/inforce/act+80+1974+cd+0+N">http://www.legislation.nsw.gov.au/maintop/view/inforce/act+80+1974+cd+0+N</a>
<i>Protection of the Environment Operations Act 1997</i>	<a href="http://www.legislation.nsw.gov.au/maintop/view/inforce/act+156+1997+cd+0+N">http://www.legislation.nsw.gov.au/maintop/view/inforce/act+156+1997+cd+0+N</a>
<i>Water Management Act 2000</i>	<a href="http://www.legislation.nsw.gov.au/maintop/view/inforce/act+92+2000+cd+0+N">http://www.legislation.nsw.gov.au/maintop/view/inforce/act+92+2000+cd+0+N</a>
<i>Wilderness Act 1987</i>	<a href="http://www.legislation.nsw.gov.au/viewtop/inforce/act+196+1987+FIRST+0+N">http://www.legislation.nsw.gov.au/viewtop/inforce/act+196+1987+FIRST+0+N</a>
<b><u>Biodiversity</u></b>	
Biodiversity Assessment Method (OEH, 2017)	<a href="https://biodiversity-ss.s3.amazonaws.com/Uploads/1494298079/Biodiversity-Assessment-Method-May-2017.pdf">https://biodiversity-ss.s3.amazonaws.com/Uploads/1494298079/Biodiversity-Assessment-Method-May-2017.pdf</a>
Guidance and Criteria to assist a decision maker to determine a serious and irreversible impact (OEH, 2017)	<a href="https://biodiversity-ss.s3.amazonaws.com/Uploads/1494298198/Serious-and-Irreversible-Impact-Guidance.PDF">https://biodiversity-ss.s3.amazonaws.com/Uploads/1494298198/Serious-and-Irreversible-Impact-Guidance.PDF</a>
Fisheries NSW policies and guidelines	<a href="http://www.dpi.nsw.gov.au/fisheries/habitat/publications/policies.-guidelines-and-manuals/fish-habitat-conservation">http://www.dpi.nsw.gov.au/fisheries/habitat/publications/policies.-guidelines-and-manuals/fish-habitat-conservation</a>
List of national parks	<a href="http://www.environment.nsw.gov.au/NationalParks/parksearchatoz.aspx">http://www.environment.nsw.gov.au/NationalParks/parksearchatoz.aspx</a>
Revocation, recategorisation and road adjustment policy (OEH, 2012)	<a href="http://www.environment.nsw.gov.au/policies/RevocationOfLandPolicy.htm">http://www.environment.nsw.gov.au/policies/RevocationOfLandPolicy.htm</a>
Guidelines for developments adjoining land and water managed by the Department of Environment, Climate Change and Water (DECCW, 2010)	<a href="http://www.environment.nsw.gov.au/protectedareas/developmntadjoiningdecc.htm">http://www.environment.nsw.gov.au/protectedareas/developmntadjoiningdecc.htm</a>
<b><u>Heritage</u></b>	
The Burra Charter (The Australia ICOMOS charter for places of cultural significance)	<a href="http://australia.icomos.org/wp-content/uploads/The-Burra-Charter-2013-Adopted-31.10.2013.pdf">http://australia.icomos.org/wp-content/uploads/The-Burra-Charter-2013-Adopted-31.10.2013.pdf</a>
Statements of Heritage Impact 2002 (HO & DUAP)	<a href="http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/hmstatementsofhi.pdf">http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/hmstatementsofhi.pdf</a>

Title	Web address
NSW Heritage Manual (DUAP) (scroll through alphabetical list to 'N')	<a href="http://www.environment.nsw.gov.au/Heritage/publications/">http://www.environment.nsw.gov.au/Heritage/publications/</a>
<b><u>Aboriginal Cultural Heritage</u></b>	
Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010)	<a href="http://www.environment.nsw.gov.au/resources/cultureheritage/comconsultation/09781ACHconsultreq.pdf">http://www.environment.nsw.gov.au/resources/cultureheritage/comconsultation/09781ACHconsultreq.pdf</a>
Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW, 2010)	<a href="http://www.environment.nsw.gov.au/resources/cultureheritage/10783FinalArchCoP.pdf">http://www.environment.nsw.gov.au/resources/cultureheritage/10783FinalArchCoP.pdf</a>
Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (OEH 2011)	<a href="http://www.environment.nsw.gov.au/resources/cultureheritage/20110263ACHguide.pdf">http://www.environment.nsw.gov.au/resources/cultureheritage/20110263ACHguide.pdf</a>
Aboriginal Site Recording Form	<a href="http://www.environment.nsw.gov.au/resources/parks/SiteCardMainV1_1.pdf">http://www.environment.nsw.gov.au/resources/parks/SiteCardMainV1_1.pdf</a>
Aboriginal Site Impact Recording Form	<a href="http://www.environment.nsw.gov.au/resources/cultureheritage/120558asirf.pdf">http://www.environment.nsw.gov.au/resources/cultureheritage/120558asirf.pdf</a>
Aboriginal Heritage Information Management System (AHIMS) Registrar	<a href="http://www.environment.nsw.gov.au/contact/AHIMSRegistrar.htm">http://www.environment.nsw.gov.au/contact/AHIMSRegistrar.htm</a>
Care Agreement Application form	<a href="http://www.environment.nsw.gov.au/resources/cultureheritage/20110914TransferObject.pdf">http://www.environment.nsw.gov.au/resources/cultureheritage/20110914TransferObject.pdf</a>
<b><u>Water and Soils</u></b>	
<b>Acid sulphate soils</b>	
Acid Sulfate Soils Planning Maps via Data.NSW	<a href="http://data.nsw.gov.au/data/">http://data.nsw.gov.au/data/</a>
Acid Sulfate Soils Manual (Stone et al. 1998)	<a href="http://www.environment.nsw.gov.au/resources/epa/Acid-Sulfate-Manual-1998.pdf">http://www.environment.nsw.gov.au/resources/epa/Acid-Sulfate-Manual-1998.pdf</a>
Acid Sulfate Soils Laboratory Methods Guidelines (Ahern et al. 2004)	<a href="http://www.environment.nsw.gov.au/resources/soils/acid-sulfate-soils-laboratory-methods-guidelines.pdf">http://www.environment.nsw.gov.au/resources/soils/acid-sulfate-soils-laboratory-methods-guidelines.pdf</a> <a href="#">This replaces Chapter 4 of the Acid Sulfate Soils Manual above.</a>
<b>Flooding and Coastal Erosion</b>	
Reforms to coastal erosion management	<a href="http://www.environment.nsw.gov.au/coasts/coastalerosionmgmt.htm">http://www.environment.nsw.gov.au/coasts/coastalerosionmgmt.htm</a>
Floodplain development manual	<a href="http://www.environment.nsw.gov.au/floodplains/manual.htm">http://www.environment.nsw.gov.au/floodplains/manual.htm</a>
Guidelines for Preparing Coastal Zone Management Plans	<a href="#">Guidelines for Preparing Coastal Zone Management Plans</a> <a href="http://www.environment.nsw.gov.au/resources/coasts/130224CZMPGuide.pdf">http://www.environment.nsw.gov.au/resources/coasts/130224CZMPGuide.pdf</a>
NSW Climate Impact Profile	<a href="http://climatechange.environment.nsw.gov.au/">http://climatechange.environment.nsw.gov.au/</a>
Climate Change Impacts and Risk Management	<a href="#">Climate Change Impacts and Risk Management: A Guide for Business and Government, AGIC Guidelines for Climate Change Adaptation</a>
<b>Water</b>	
Water Quality Objectives	<a href="http://www.environment.nsw.gov.au/ieo/index.htm">http://www.environment.nsw.gov.au/ieo/index.htm</a>
ANZECC (2000) Guidelines for Fresh and Marine Water Quality	<a href="http://www.environment.gov.au/water/publications/quality/australian-and-new-zealand-guidelines-fresh-marine-water-quality-volume-1">www.environment.gov.au/water/publications/quality/australian-and-new-zealand-guidelines-fresh-marine-water-quality-volume-1</a>

Title	Web address
Applying Goals for Ambient Water Quality Guidance for Operations Officers – Mixing Zones	<a href="http://deccnet/water/resources/AWQGuidance7.pdf">http://deccnet/water/resources/AWQGuidance7.pdf</a>
Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)	<a href="http://www.environment.nsw.gov.au/resources/legislation/approvedmethods-water.pdf">http://www.environment.nsw.gov.au/resources/legislation/approvedmethods-water.pdf</a>

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# NSW RURAL FIRE SERVICE



Secretary  
Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Your reference: SSD 8696  
Our reference: D17/2992

05/09/2017

**Attention:** Rose-Anne Hawkeswood

Dear Sir/Madam,

## Suntop Solar Farm – 909 Suntop Road Suntop

Reference is made to correspondence dated 30 August 2017 seeking input regarding the preparation of Secretary's environmental assessment requirements for the above State Significant Development in accordance with the *Environmental Planning and Assessment Act 1979*.

The New South Wales Rural Fire Service (NSW RFS) has reviewed the information provides the following conditions;

- A 10 metre trafficable defensible space shall surround the solar farm infrastructure.

If you have any queries regarding this advice, please contact Matthew Apps, Development Assessment and Planning Officer, on 1300 NSW RFS.

Yours sincerely,

Nika Fomin  
Manager, Planning and Environment Services (East)

### Postal address

NSW Rural Fire Service  
Records Management  
Locked Bag 17  
GRANVILLE NSW 2141

### Street address

NSW Rural Fire Service  
Planning and Environment Services (East)  
42 Lamb Street  
GLENDENNING NSW 2761

T 1300 NSW RFS  
F (02) 8741 5433  
E [pes@rfs.nsw.gov.au](mailto:pes@rfs.nsw.gov.au)  
[www.rfs.nsw.gov.au](http://www.rfs.nsw.gov.au)

5 September 2017

SF2017/201122; WST17/00132

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

**Attention: Ms Rose-Anne Hawkeswood**

Dear Ms Hawkeswood,

**SSD 8696: Lots 1, 2 and 3 DP 506925, Lot 122 DP 753238 and Lot 90 DP 657805  
Suntop Road, Suntop; Suntop Solar Farm  
Request for Secretary's Environmental Assessment Requirements (SEARs)**

Thank you for your email on 30 August 2017 seeking SEARs from Roads and Maritime Services for the Suntop Solar Farm proposal. Roads and Maritime notes the proposal is for construction and operation of a 220 megawatt solar farm on land south-west of Wellington with frontage to Suntop Road.

The preliminary information submitted in support of the proposed development has been reviewed. Roads and Maritime requests that the following issues be addressed in the Environmental Assessment:

- A traffic impact study prepared in accordance with the methodology set out in Section 2 of the RTA's *Guide to Traffic Generating Developments 2002* and including:
  - Hours and days of construction.
  - Schedule for phasing/staging of the project.
  - Traffic volumes:
    - Existing background traffic.
    - Project-related for each stage of the project including construction, operation and decommissioning.
    - Projected cumulative traffic volumes.

**Roads and Maritime Services**

- Traffic volumes are to also include a description of:
  - Ratio of light vehicles to heavy vehicles.
  - Peak times for existing traffic.
  - Peak times for project-related traffic.
  - Transportation hours.
  - Project related traffic interaction with existing and projected background traffic.
- The origin, destination and routes for:
  - Employee and contractor light traffic.
  - Heavy traffic.
  - Over size and over mass traffic.
- A description of all oversize and over mass vehicles and the materials to be transported.
- The impact of traffic generation on the public road network and measures employed to ensure traffic efficiency and road safety during construction, operation and decommissioning of the project.
- The need for improvements to the road network, and the improvements proposed such as road widening and intersection treatments, to cater for and to mitigate the impact of project-related traffic.
- Local climate conditions that may affect road safety for vehicles used during construction, operation and decommissioning of the project (eg fog, wet and dry weather).
- Proposed road facilities, access and intersection treatments are to be identified and be in accordance with *Austroads Guide to Road Design 2010* including Safe Intersection Sight Distance (SISD). In particular SISD needs to be provided at the intersection of Suntop Road and Renshaw McGirr Way (MR233).
- The layout of the internal road network, parking facilities and infrastructure within the project boundary.
- A Traffic Management Plan (TMP) developed in consultation with Dubbo Regional Council and Roads and Maritime. The TMP is to identify and provide management strategies to manage the impacts of projected related traffic including:
  - Haulage of materials to site.
  - Transportation of construction workers from accommodation facilities to site and return.

Roads and Maritime appreciates the opportunity to contribute to the SEARs and requests that a copy of the SEARs be forwarded to Roads and Maritime at the same time they are sent to the applicant.

Should you require further information please contact me on 02 6861 1453.

Yours faithfully



Andrew McIntyre  
Manager Land Use Assessment  
Western