

22 December 2021

NSW Department of Planning, Industry and Environment
Attn: Ms Tatsiana Bandaruk
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Dear Ms. Bandaruk,

**Wellington North Solar Farm (SSD 8895)
Development Consent Condition 10(a), Schedule 3 - Vegetation Buffer**

Please find below a response to the Department's request for additional information regarding Lightsource bp's request for the Secretary's agreement to allow the planting works for the vegetation buffer on the Wellington North Solar Farm (the Project) to be delayed beyond the commencement of construction, to late Spring 2022.

- Justify why the planting haven't commenced already or why it cannot happen prior to the frost season.

Lightsource bp are in the process of reaching financial close for the Project and appointing an Engineering, Procurement and Construction (EPC) Contractor. We anticipate this process to be complete in June 2022, at which time works can commence on the Project site.

- Justify why the delay is acceptable from a visual perspective, and what other short-term mitigation have been considered.

There would be minimal difference in screening benefit by undertaking the planting works in Autumn 2021 instead of the newly proposed timing of late Spring 2022. This is because the newly planted vegetation would enter a phase of Winter dormancy, if planted in Autumn. Active growth would then resume as daytime ambient temperatures, and corresponding soil temperatures, increase.

Depending on when the Autumn planting occurred, there may be 50 to 75mm additional height achieved, although in terms of screening effect, this would be negligible. Given the low height of newly planted vegetation / tubestock this additional height of 50 to 75mm (plausibly achieved by planting in Autumn instead of Spring) will not negatively impact the visual outcomes of the development; screening benefits will only become obvious once plants have grown to their intended height.



The main benefit in delaying the planting to Spring 2022 would be to avoid the Winter frosts that have the potential to cause plant losses as tubestock is commonly frost tender at this early stage of plant development. Dead plants would then need to be replaced which would occur once the risk of frosts have passed (i.e. September 2022 onwards).

Short-term mitigation options that have been considered include the erection of shade cloth to either the proposed site fencing or temporary site fencing, if the site fencing had not been erected at this time. This would screen views into the site but may not achieve a better result in terms of improving visual quality. In addition, this approach would be costly and have environmental impacts when disposing of the shade cloth after it's short-term and temporary use.

- Confirm until when you want to delay the planting (i.e. current request includes a range from mid-October until November).

The exact timing of planting would be informed by specialist advice and weather conditions in the region. Lightsource bp has engaged a specialist on this matter who has recently said that the planting could be brought forward as early as sometime in September, once the risk of frosts had passed and providing plant material was available. Regardless, Lightsource bp is seeking a delay up to and including November 2022 in case favourable weather conditions do not occur until later Spring 2022.

- Confirm you are still be able to meet the outcomes of the conditions with a revised plan of timing.

The delay in undertaking the planting works to the following Spring 2022 would have no appreciable difference in achieving the screening effects required by the development consent.

Thank you and feel free to contact me on 0409 601 473 if you have any further questions.

Kind regards,



Diana Mitchell
Principal Environmental Planner