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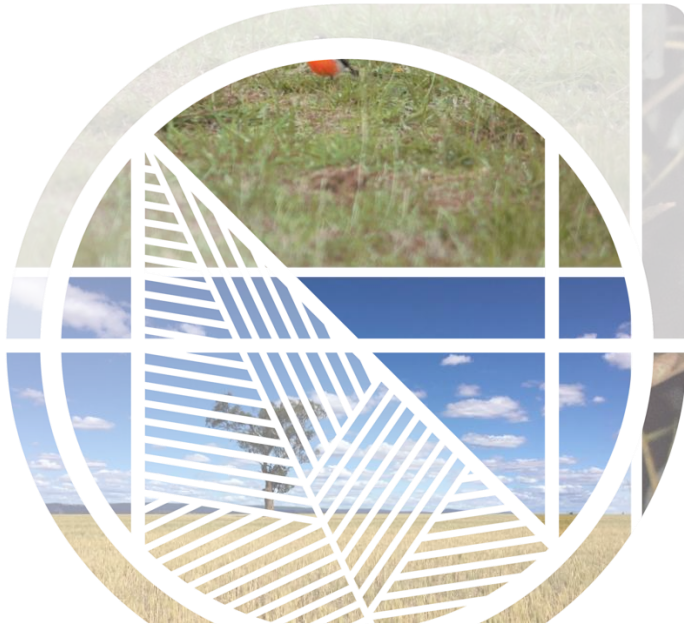


RESPONSE TO SUBMISSIONS

Walla Walla Solar Farm

April 2020

Project Number: 18-622



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1. INTRODUCTION

1.1. BACKGROUND

A 300 megawatt (MW) alternating current (AC) photovoltaic (PV) solar farm is proposed to be developed approximately 4.3 km north east of Walla Walla. The Walla Walla Solar Farm (the proposal) would have a development footprint of around 495 hectares (ha).

The proposal is classified as State Significant Development (SSD) under the New South Wales (NSW) *Environmental Planning and Assessment Act 1979* (EP&A Act) and requires consent from the NSW Minister for Planning. An Environmental Impact Statement (EIS), describing the proposal and assessing its potential environmental impacts was prepared by NGH and submitted to the NSW Department of Planning, Industry and Environment (DPIE). The EIS was placed on public exhibition between 1 November 2019 and 2 December 2019.

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

- Visual amenity.
- Land use and resources.
- Socioeconomic and community.
- Noise and vibration impacts.
- Traffic, transport and road safety.
- Water use and quality, including groundwater.
- Biodiversity.
- Aboriginal heritage.

These issues were investigated via specialist assessments. Lower risk issues were investigated primarily by desktop assessment.

Following substantial engagement with local community members prior to EIS exhibition, modifications were made to the design of the proposed solar farm to meaningfully reduce impacts to the nearest residential neighbours. Key modifications include:

Community:

- Vegetation screening buffers ranging from between 5 m to 50 m along the inside of the development site boundary.
- Significant solar infrastructure setbacks along boundaries where this infrastructure is visible from residential properties and a local wedding business (Orange Grove Gardens).
- Security fence placed within the development to retain boundary vegetation and new visual screening to be planted on the outside of the fence. All fences within the development site will be free of barbed wire.
- Substation site selected to ensure existing boundary vegetation can be retained to reduce visual impact on residential neighbours, while still being close enough to existing transmission lines to retain productive efficiency.
- 10 m Asset Protection Zone (APZ) implemented around the full perimeter of the project for fire safety.
- 400 m inverter exclusion zone to reduce visual impact and guarantee no ongoing operational noise impacts on the nearest residence.
- Site access point relocated to the north eastern corner to move construction and operation traffic away from surrounding neighbours. The main site entrance would now be located approximately 1.4 km away from the nearest resident.
- Operational buildings have been relocated to the main entrance at the northeast corner of the development site, approximately 1.4 km from any residence.

- Provision of around 250 full time equivalent (FTE) construction and 21 FTE opportunities during operations.

Biodiversity:

- Biodiversity Enhancement Plan including:
 - Existing vegetation retained where possible.
 - Installing approximately 120 nesting boxes across the development site.
 - Expanding connected woodland to facilitate Squirrel Glider movements.
 - Filling screening vegetation with food plants for fruit, pollen and nectar feeders.
 - Retaining 15 of the 17 farms dams at the development site. Transforming 10 of 15 retained farmed dams into small native wetlands with riparian vegetation.
 - Removing barbed wire from all fencing (including security and stock fencing within the development site).

All amendments are within the previously surveyed solar farm footprint. Therefore, no further assessments were required including for the Aboriginal Cultural Heritage Assessment Report (ACHAR) and Biodiversity Development Assessment Report (BDAR). The maps within the Landscape Plan, ACHAR and BDAR have been updated to reflect the changes in the design of the proposal.

1.2. PURPOSE OF THIS REPORT

NGH has prepared this RTS on behalf of FRV Services Australia ('the proponent' or 'FRV') in response to DPIE's letter dated 9 December 2019 and to fulfil the requirements of section 85A of the *Environmental Planning and Assessment Regulation 2000*. The purpose of the RTS is to:

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

2. WALLA WALLA SOLAR FARM PROPOSAL

2.1. PROPOSAL AS EXHIBITED

2.1.1. The proponent

FRV is a global company with over 40 operational renewable energy projects across the world including four operational utility solar farms in Australia and two additional projects under construction near Parkes, NSW and VIC. FRV aims to be at the forefront of the global energy transition to renewables, while setting the highest standards of quality, community engagement, technical innovation and commitment to service delivery, from planning to operations of assets for single and portfolios of customers, suppliers and investors.

In NSW, two of FRVs solar farm developments have a Power Purchase Agreement (PPA) with Snowy Hydro, Goonumbla Solar Farm and Sebastopol Solar Farm.

FRV pioneered Australia's first ever utility-scale solar farm in the Australian Capital Territory (ACT) (Royalla Solar Farm) and as a global operator of renewable assets, FRV has a clear strategy to manage its projects through design, construction and the full operational lifecycle. Numerous other projects are under development and consideration by FRV.

FRV acquired the proposed development in July 2019 from the original developer, Bison Energy. From inception, FRV have been engaging with local stakeholders and working to accommodate concerns where possible. As a result, FRV has implemented significant design changes to the proposal.

2.1.2. The subject land

The proposal is in the Greater Hume Local Government Area (LGA), approximately 4.3 km north east of the township of Walla Walla (Figure 2-1). The subject land occupies 807 ha of freehold land and comprises Lots 16, 17, 20, 21, 87, 88, 89, 108, 109 118 of DP 753735, Lot 3 DP 253113, Lot 1 DP 1069452, Lot A DP 376389 and Lot 1 DP 933189 (Figure 2-2). Of this, approximately 495 ha makes up the development footprint). The proposed substation would connect to the existing TransGrid Jindera to Wagga Wagga 330 kV transmission line running north to south across the western side of the development site, through Lot 1 DP 1069452.

The development site (leased area) comprises several large paddocks that are generally flat, largely cleared of native vegetation, and cultivated for pastures and grazing, which is the dominant land use in the area. The land has been largely grazed over recent years with only intermittent cropping and is consistent with Class 4 land as defined by the Land and Soil Capability Scheme (OEH 2012).

Rural land within the region is used primarily for mixed agriculture including cropping and grazing. The development area comprises several large paddocks, which have been deep ripped and largely cleared for pastures and grazing. Agricultural activities like those carried out on the subject land are widespread in the region. There is no evidence of horticulture, irrigation agriculture or other intense farming activities within the proposal area. Seventeen man-made dams exist within the development site, fifteen of these dams within the development footprint will be retained.

There are no residences within the development site. Six residences are located within 1 km of the proposal (R1a, R1b, R2, R3, R4, R5a). Two of these residences are the subject landholders (R3 & R4). The closest dwelling from proposed solar arrays is approximately 210 m to the north (R1a).

2.1.3. Key components of the proposal

The proposal would have a maximum installed capacity of 300 MW (AC), and would include:

- Approximately 900,000 PV solar arrays mounted on single axis tracking systems.
- Electrical cables and conduits.

- Approximately 72 modular inverter units.
- New TransGrid substation and connection point comprising transformers, associated switchgear, control and protection equipment.
- 33 kV/330 kV transformer and protection.
- Operations and maintenance (O&M) building, parking and perimeter fencing.
- Primary access point on Benambra Road.
- Emergency/maintenance access points off Benambra and Schneiders Roads.
- 2 x 20,000 L water tanks at each emergency and regular access point.
- Internal access tracks.
- Reactive lighting, CCTV system, security fencing.
- Vegetative screening and setbacks.

Benambra Road runs along the northern boundary of the subject land and Schneiders Road runs through the subject land in a north to south direction. The proposal would have one primary access point at the north-eastern corner of the project, off the Benambra Road, approximately 2.6 km west of Olympic Highway. Schneiders Road runs between the land parcels of the development site and would be used for auxiliary access to the proposal.

An internal road system would be established for the construction and maintenance of the solar farm infrastructure.

The proposal is expected to operate for 30 years. The construction phase of the proposal is expected to take 16 to 20 months, commencing in early 2021, subject to approvals. At the end of its operating life, the proposal would either be decommissioned, removing all infrastructure and returning the site to its previous land capability, or upgraded with new photovoltaic equipment subject to modification of the Conditions of Approval (CoA).

2.1.1. Indicative life of proposal timeline

An indicative timeline for the proposal is outlined in Table 2-1.

Table 2-1 Indicative timeline.

Phase	Approximate commencement	Approximate duration
Construction	Q1 2021	16 to 20 months
Operation	Q4 2022	30 years
Decommissioning	Q4 2052	6 months

2.2. SITE SUITABILITY

Walla Walla township is a service centre for the area, located approximately 4.3 km from the proposal. The local economy has experienced setbacks recently including General Motor’s announcement on 17 February to end sales in Australia, which will see the local Lieschke dealership close in June this year. Additionally, a number of other retail businesses have closed or reduced their trading hours and the local primary school struggles to retain sufficient pupil numbers. The proposal would provide a much needed injection into the town’s economy.

Key considerations for site selection are detailed within the *NSW Large-scale Solar Energy Guideline for State Significant Development* (DPE 2018), including:

- The proposal is not highly visible, not located on high ground or within a valley. A residence and a local business, both over 800 m from the legal site boundary have a slightly elevated view.

Screening and infrastructure setbacks are proposed increasing the distance of the business from any solar panels to 1200 m.

- Minimal impacts to biodiversity are expected due to historical disturbance, agricultural activities and the proponent’s aspirations to undertake biodiversity enhancement activities.
- There would to no land use conflicts due to zoning.
- According to Land and Soil Capability Scheme (OEH 2012) the proposal is located on Class 4 and Class 6 Agricultural Land. FRV considers the site suitable for a solar farm due to the following reasons:
 - The proposal is not expected to adversely affect the biophysical nature of the land.
 - Most of the development site is infrequently cropped and is better suited to grazing.
 - The proposal would positively affect soils by providing the benefits of long-term fallow, e.g. increasing soil moisture, building soil carbon levels, allowing structural recovery and improving soil biota.
 - The proposal would not result in the permanent removal of agricultural land, for example compared to residential and industrial estates.
 - The proposal would not result in rural fragmentation given it will not permanently alter the development site or surrounding environment.
 - Adjacent farming operations are compatible.
 - Sheep grazing would continue within the development site to approximately 85% of its pre-solar farm capacity.
- The flood risk at the site is manageable by positioning water sensitive infrastructure outside the 5% AEP flood zone with modified footings to elevate infrastructure where required. Security fencing would include flood gates to limit the trapping of debris.
- The development site is not mapped as bushfire prone land. Substantial management measures would be put in place in accordance with statutory requirements and consultation with local RFS brigades.
- No exploration or mining licences intersect the subject land.
- The proposal is not located on Crown land. One Crown paper road runs directly along the eastern boundary of the development site and has been revegetated by the neighbouring landowner. This Crown road would not be impacted by the proposal.

2.3. PROPOSAL CHANGES SINCE EXHIBITION

Key areas of additional investigation and changes to the layout design are described below.

2.3.1. Key areas of additional investigation

Specific additional investigations were undertaken as part of this RTS, in response to the feedback received as part of EIS stakeholder reviews. The outcomes of these studies have been used to respond to specific issues raised, and have assisted to inform the changes to the proposal as outlined in Table 2-2.

Table 2-2 Key areas of additional investigation

Additional investigation				Resultant changes to the proposal, based on investigation outcomes
	Study	Motivation	Outcome	
1	Consideration of the Riverina Murray Draft Important Agricultural Land Mapping	To further investigate site-specific land capability mapping and the proposal’s impact on the availability of important agricultural land.	<ul style="list-style-type: none"> • The development site is mapped as important agricultural land under the Riverina Draft Important Agricultural 	<ul style="list-style-type: none"> • Nil

Additional investigation			Resultant changes to the proposal, based on investigation outcomes
Study	Motivation	Outcome	
Project, January 2020		Land Mapping Project. However, the development site is currently used for grazing with intermittent cropping only. Recent land use is consistent with Class 4 land as defined in the Land and Soil Capability Scheme (OEH 2012).	
2 Updated BDAR, March 2020	To further characterise creekline vegetation. Provide additional justification of future vegetation integrity score of vegetation zone 4.	<ul style="list-style-type: none"> Creekline vegetation characterised for biodiversity enhancement activities. Additional justification and recalculation of future vegetation integrity score 	No changes to the proposal are proposed. Existing biodiversity mitigation strategies are sufficient to manage impacts identified (refer Appendix A).
3 Updated Landscape Plan, March 2020	To effectively balance and communicate screening, biodiversity and bushfire management priorities within design plans.	<ul style="list-style-type: none"> Clear delineation of existing vegetation, planned screening plantings and APZ. Removal of planned screening from APA gas pipeline easement. Setback of infrastructure at the south-east corner of the proposal. 	Removal of planned screening from APA gas pipeline easement and incorporation of additional setback for Orange Grove Gardens (refer Appendix B).

2.3.2. Infrastructure changes

The infrastructure elements would remain largely as presented in the EIS. Changes to the design are further detailed in the Amendment Report (refer Appendix C) and include:

- Additional setback on the south eastern corner of the development site to mitigate visual impacts on Orange Grove Gardens wedding venue and ecolodge business. The distance between the venue and any solar infrastructure would be increased to 1200 m. The south eastern corner devoid of panels would be cropped by the landholder to retain agricultural views for Orange Groove Gardens.
- Layout modified to avoid waterfront land along the riparian zone of Middle Creek (20 m). As a result of this change, the development footprint for the proposal is now slightly smaller than the 495 ha detailed in the BDAR. FRV is prepared to offset biodiversity credit obligations for the balance, even though the 20 m riparian zone for Middle Creek would now not be impacted.
- Four additional gates along the gas pipeline easement to allow APA unrestricted access to their infrastructure.
- No structures to be established within the 24 m gas pipeline easement.

- Removal of screening plantings from the APA gas pipeline easement.

The updated infrastructure layout is provided in Figure 2-3. A revised constraints map is included in Figure 2-4.

2.3.3. Additional details that now form commitments

- Commitments to ensure APA has access to the gas pipeline for maintenance works for the life of the proposal and that solar farm activities avoid the gas pipeline easement.
- Additional safety management, electrical hazard and electrical interference studies to ensure the proposal is compatible with the existing gas pipeline.
- In the unlikely event that glint or glare from solar panels is evident, the proponent would provide a barrier to mitigate the hazard.
- A Traffic Management Plan would be developed and implemented during construction and decommissioning. A Road Dilapidation Report for transport routes would be completed at the proponent's cost in consultation with the relevant road authorities (RMS and Council). Any damage resulting from the construction (or decommissioning) traffic, except that resulting from normal wear and tear, would be repaired at the proponent's cost.
- Biodiversity commitments that align with the revised BDAR and BCD comments on the EIS.

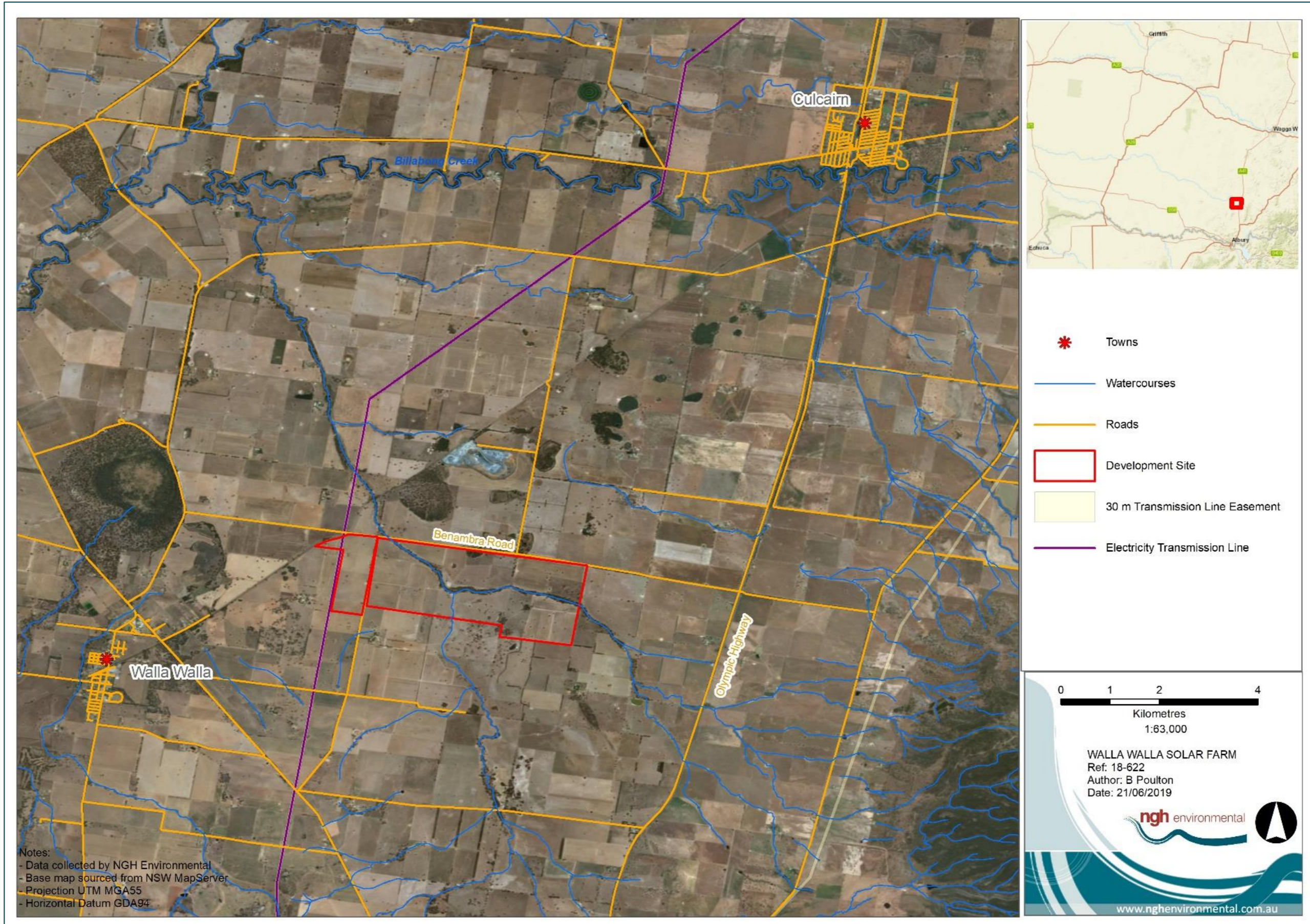


Figure 2-1 Location of the proposal

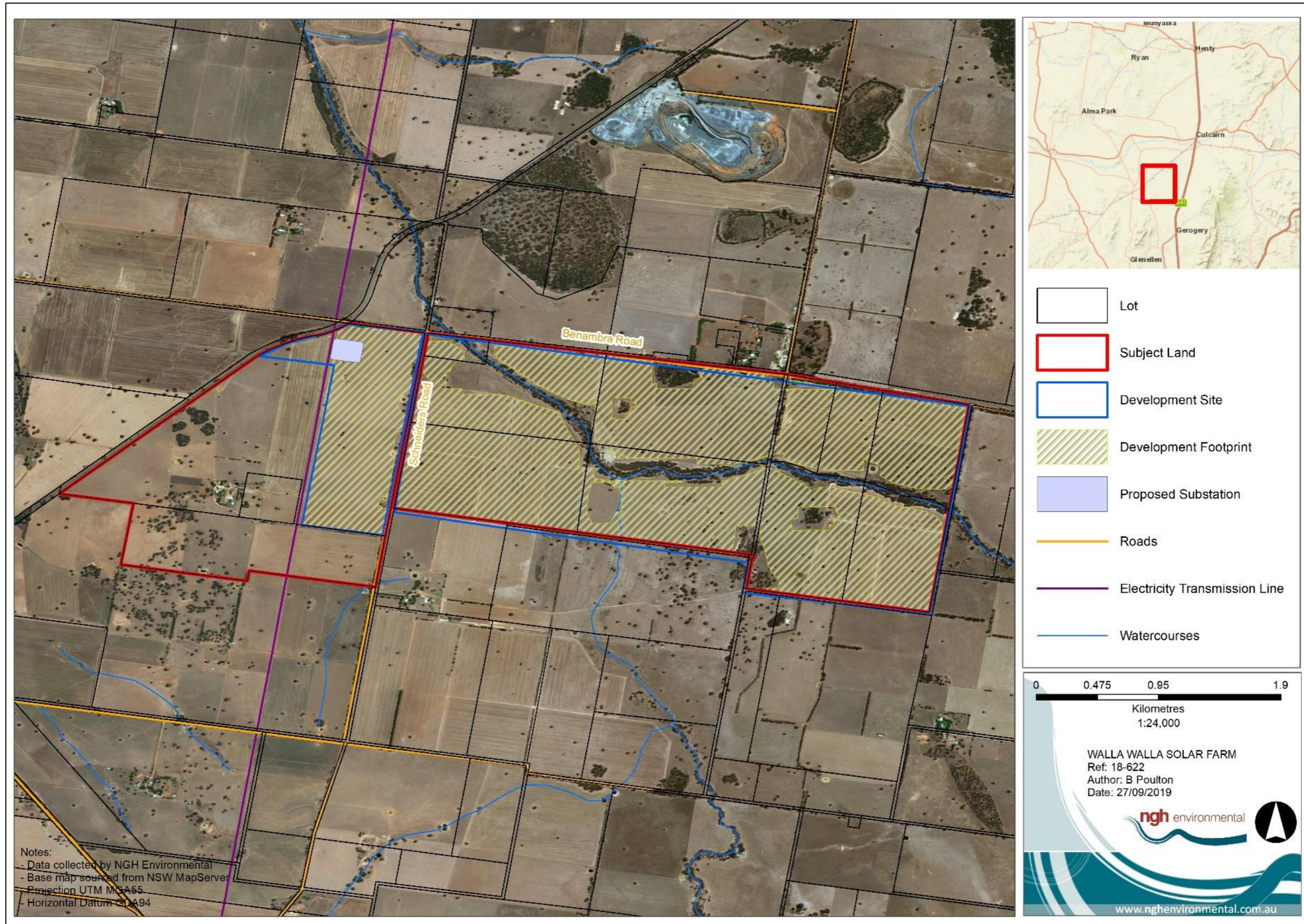


Figure 2-2 Proposed subject land.

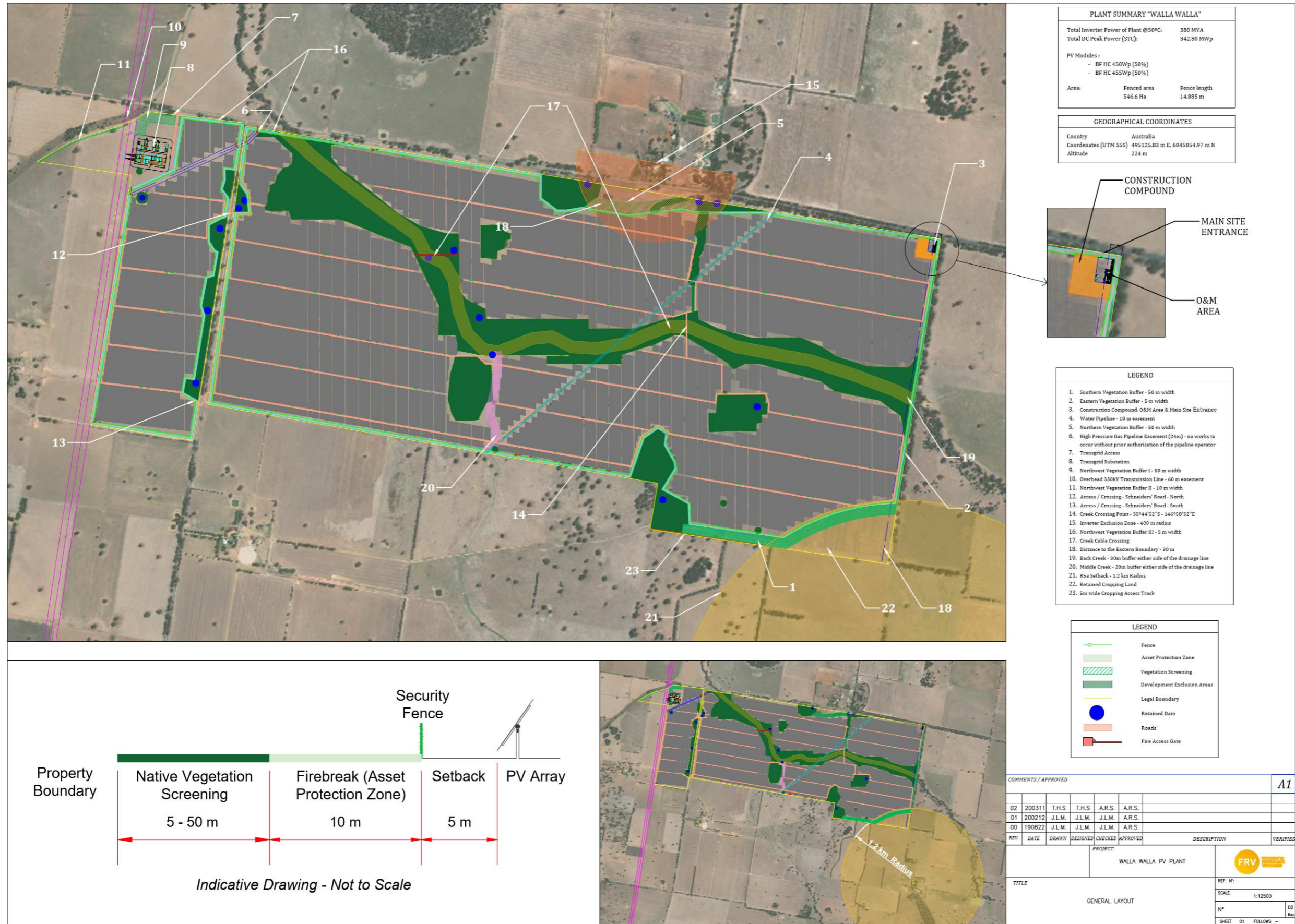


Figure 2-3 Proposed infrastructure layout.

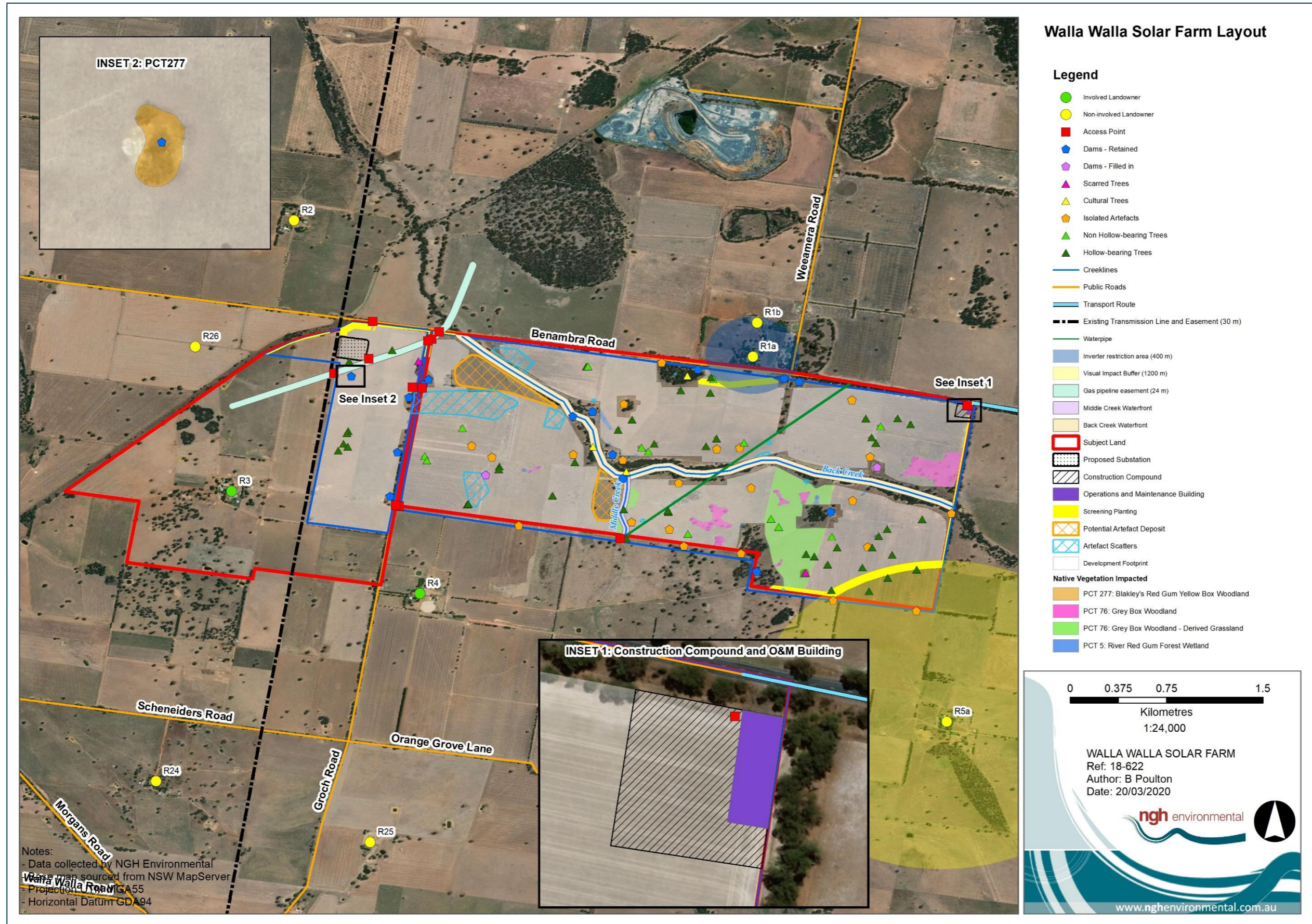


Figure 2-4 Updated constraints map of the proposal.

2.4. PROJECT BENEFITS

In addition to reduced greenhouse gas emissions and meeting Federal and NSW State Government energy policies, local social and economic benefits associated with construction and operation of the proposal include:

- Direct and indirect employment opportunities during construction and operation of the proposal. This includes up to 250 employees at the peak of construction (8 to 12 months) and approximately 21 FTE operational staff for the life of the project, 16 of which are likely to live and work locally.
- Diversifying employment opportunities beyond the productive agriculture sector.
- The proposal would provide significant participation opportunities for businesses and workers located in the area.
- Direct business volume benefits for local services, materials, and contracting (e.g. accommodation, food and other retail).
- Assistance in meeting the future national electricity demands.
- An approximate annual operating budget of \$10 million.
- Council rates revenue associated with the solar farm.
- Voluntary Planning Agreement with Council (VPA), to support local community activities, facilities and services.
- Introduce additional sources of employment and income to the region.

Additionally, the proposal would address the environmental constraints of the site appropriately. It would be designed to:

- Preserve biodiversity features through minimising tree and vegetation community removal.
- Enhance biodiversity through extensive planting of native vegetation, protecting sensitive areas, restoring riparian zones of retained dams and creek areas.
- Preserve Aboriginal cultural heritage through maintaining important features.
- Minimise impacts to soil and water, through pile driven panel mounts rather than extensive soil disturbance and excavation.
- Minimise visual impacts to neighbours, incorporating vegetation screens and setbacks located in consultation with neighbours, where required.
- Preserve agricultural production values, being highly reversible at the end of the project's life and utilising the area for sheep grazing for the lifetime of the project.

2.5. PROJECT JUSTIFICATION

The proposal would meet the objectives, principally the development of a utility scale solar electricity power station. It is justified in terms of reducing Australia's GHG emissions and meeting future energy demands. It would contribute to Australia's renewable energy targets and support a global reduction in GHG emissions. Ultimately, it would contribute to economic development in Walla Walla and the surrounding region.

Suitability details are described in Table 2-3 below.

Table 2-3 Site conditions and constraints (NSW Large-scale Solar Energy Guideline for State Significant Development (DPE, 2018))

Preferable site conditions	Site justification
Visibility and topography – sites with high visibility, such as those on prominent or high ground positions, or sites which are located in a valley with elevated nearby residences	The development site does not include any prominent or high ground positions, nor is it located within a valley. The proposal does not have high visibility from regional vantage points. The proposal is not visible from Morgan's

Preferable site conditions	Site justification
<p>with views toward the site. This is particularly important in the context of significant scenic, historic or cultural landscapes.</p>	<p>Lookout (7.5 km to the north-west).</p> <p>Two direct neighbours on slightly elevated land around the site have partial views of the arrays and substation. One of these residences functions as a wedding venue and ecolodge. One further property with two residences is located immediately north of Benambra Road with clear views of the development site. The concerns raised by these residences have been fundamental in developing visual impact reduction measures in this EIS.</p>
<p>Biodiversity – areas of native vegetation or habitat of threatened species or ecological communities within and adjacent to the site, including native forests, rainforests, woodlands, wetlands, heathlands, shrublands, grasslands and geological features.</p>	<p>Based on preliminary biodiversity, heritage and other investigations, the indicative design would minimise environmental impacts overall. The final design would avoid the majority of native vegetation, water features and habitat of threatened species or ecological communities.</p> <p>The proposal intends to implement best practice biodiversity enhancement, with enough setback to allow for any shading impacts. The development site is unobtrusive, flat and has low-lying topography.</p>
<p>Residences – residential zones or urbanised areas.</p>	<p>The development site is within the rural agricultural landscape of Walla Walla. Residences are generally scattered with homesteads surrounded by large tracts of arable farmland. There are six direct neighbours adjoining the subject land perimeter, two of who are subject landowners. Within a 3 km radius from the site, there are an additional nine ‘near neighbours’ (excluding those residences on the outskirts of Walla Walla).</p> <p>The town of Walla Walla is 4.3 km west of the subject land, with the next nearest town – Culcairn, located 8.5 km north-west of the development site.</p> <p>Hence, the site is not considered to be located within a residential zone or urbanised area.</p>
<p>Agriculture – important agricultural lands, including Biophysical Strategic Agricultural Land (BSAL), irrigated cropping land, and land and soil capability classes 1, 2 and 3. Consideration should also be given to any significant fragmentation or displacement of existing agricultural industries and any cumulative impacts of multiple developments.</p>	<p>The proposal is not located on BSAL. The proposal is located on soil capability Class 4 and 6 land as mapped and described by the Land and Soil Capability Scheme. Contrary to this, the Riverina Draft Important Agricultural Land Mapping Project maps the subject land as important agricultural land. The current land use of the site is predominantly sheep and cattle grazing with intermittent canola and wheat crops. There is little evidence that the land could support continual cropping without significant inputs and should therefore be considered moderately productive, which is consistent with the description Class 4 under the Land and Soil Capability Scheme.</p> <p>The two farm contractors leasing the development site provided letters of support for the proposal because they</p>

Preferable site conditions	Site justification
	<p>believe that the land that would be lease for the proposal is only 'marginal land.' As a result of the proposal both contractors would have access to more productive land, retained by the landholder for agricultural land use. Both landowners provided confidential letters to DPIE confirming that the land they would lease to FRV is not highly productive or suitable for regular cropping.</p> <p>The development site is located within 2 km of the proposed Culcairn Solar Farm.</p>
<p>Natural hazards – areas subject to natural hazards such as flooding and land instability.</p>	<p>The scale and size of the proposal was influenced by the subject land area, geology, hydrology, access and road connections.</p> <p>Back Creek runs west-east and Middle Creek (non-incised) south-east through the subject land. These creeks eventually confluence with Billabong Creek, which drains into the Murray River. Back Creek contains remnant riparian vegetation and would not be impacted by the proposal, whereas the south-east overland ephemeral flow path is currently cultivated as a crop and is not immediately apparent on the ground. Neither creek line is key fish habitat.</p> <p>Flood modelling for the site shows 5% AEP, 1% AEP and PMF affects part of the development site. The substation would be located outside the PMF, while the O&M building and switchroom would be located outside the 1% AEP. Solar panels would be located largely outside the 5% AEP.</p> <p>Soil at the site is stable and suitable to support the level and type of infrastructure proposed.</p>
<p>Resources – prospective resource developments, including areas covered by exploration licences, and mining and petroleum production leases. Solar development applicants should seek advice from the Department of Planning, Division of Resources and Geoscience about the coverage of resources-related licences.</p>	<p>Email correspondence with GSNSW confirms that there are no current operating mines or quarries over the proposal or adjacent lands (see Appendix D.1 of the EIS).</p> <p>GSNSW has identified that the 'Hurricane Hill' hard rock quarry operated by Boral Resources Pty Ltd is located approximately 1.5 km to the north of the project site. Consideration should be given to the impacts the project may have on the quarry's operations. Consultation with Boral during the preparation the EIS is provided in Appendix B.1.2 of the EIS</p>
<p>Crown Lands – if any part of the project or associated transmission or distribution infrastructure will cross Crown Lands, it may be subject to legislative requirements that restrict access to the land.</p>	<p>The development site comprises privately owned farmland that would be leased by FRV for the life of the proposal.</p>

3. PUBLIC EXHIBITION

3.1. EXHIBITION PERIOD AND LOCATION

The EIS was placed on public exhibition for a period of 4 weeks from 1 November 2019 to 2 December 2019, and was available on-line at: <https://www.planningportal.nsw.gov.au/major-projects/project/9931>

Two hard copies were available at two locations:

- Greater Hume Shire Council: 40 Balfour Street, Culcairn.
- Greater Hume Shire Council: Walla Walla Customer Service Centre, Commercial Street, Walla Walla.

3.2. RESPONSES RECEIVED

During the exhibition period, DPIE received submissions from 12 government agencies, 3 organisations/special interest groups and 152 members of the public including businesses. 89 (60%) of the public submissions were objections and 62 (40%) were letters in support of the proposal. The submissions are summarised in section 0 below.

Table 3-1 Responses received

Category	Number of responses received
Public submissions	152
Organisation submissions	3
Government agency submissions	13 (although two RFS submissions contain the same comments)
Crown Lands	
Department of Primary Industries	
DPIE Biodiversity Conservation Division	
DPIE Geological Survey of NSW	
DPIE Water and Natural Resources Access Regulator (NRAR)	
Fire and Rescue NSW	
Greater Hume Shire Council (Objection)	
Heritage Council of NSW	
NSW Environment Protection Authority	
NSW Rural Fire Service (RFS), Granville NSW	
NSW Rural Fire Service (RFS), Sydney Olympic Park (same comments as Granville NSW)	
Roads and Maritime Services	
TransGrid	

Category	Number of responses received
Total	168

The issues raised in each submission received are summarised below in sections 4.1.1 (public submissions), section 4.1.2 (organisation submissions) and section 4.1.3 (agency submissions). The full submissions can be found on the Major Projects website: <https://www.planningportal.nsw.gov.au/major-projects/project/9931>

3.3. ADDITIONAL CONSULTATION

Community consultation has continued since lodgement of the EIS. Consultation measures have been designed to ensure the community, particularly near neighbours, has continued opportunity to provide input into the project.

3.3.1. General community

Community information resources such as the Project Fact Sheet, FAQ and Website have been updated to reflect consistent feedback themes from earlier Community Information Sessions. Relevant detail from the EIS report has also been summarised and provided via these channels. This includes further detail on the following topics:

- EIS planning pathway and options for community input.
- Economic benefits and job opportunities.
- Zoning and compatibility with agricultural land use.
- The need for renewable energy to meet future customer demand.

FRV's Project Manager and Community Engagement Specialist have continued to respond to community and neighbour enquiries as required. The majority of enquiries continue to be received either via a dedicated project contact number or email. The Community Enquiries register remains a live document, with details of all consultation and engagement activities recorded to provide a 'real time' register of community interests, perceptions and issues. For the privacy of the individuals, relevant written correspondence which has been received since the EIS has been submitted is provided confidentially in Appendix D.7.

Since the EIS was submitted, email updates (2) have also been sent to all the registered community members outlining progress with the project's EIS application and explaining the next steps of the approvals process. These included an e-mail to notify the community that the application had been submitted and a direct link to where the full application could be viewed during Public Exhibition. The second e-mail was to thank the community members who had made submissions during the Exhibition period and offered meetings for anyone who would like to discuss the submissions or project further prior to FRV providing a response to the DPIE.

Following the submission of this RTS report, FRV will provide an additional email update to the community members, notifying them that the RTS has been submitted and an updated FAQ document will also be supplied.

In order to further mitigate visual impacts from the proposal, FRV offered to plant screening vegetation over winter 2020 to provide the adjoining neighbours additional growth time prior to construction. Phone conversations along with letters were sent to residential receivers R1, R2 and R5 on 14 February 2020. All three neighbours requested that FRV not plant screening vegetation until development consent determination. This request by near neighbours has been respected by FRV.

In response to submissions received relating to visual impacts for Orange Grove Gardens, FRV implemented a further setback so that the total distance between the business venue and solar panels would be increased to 1200 m. The owners of Orange Grove Gardens were informed of this measure by phone and email on 24 March 2020.

Project information has also been shared via local media – with background information and interviews provided on request.

3.3.2. Non-government organisations

Further consultation has been carried out with RWCC, to confirm the opportunity to obtain water from the metered water pipeline that runs through the development site (refer Appendix D.1). Further to APA Group's submission, FRV have undertaken further conversations with them on how best to meet their requirements (refer Appendix D.2).

3.3.3. Government agencies

Senior project team members provided a detailed briefing to the Greater Hume Shire Council (Council) Executive and elected members on 6th November 2019. This session provided detail of recent Community Information Drop-In Sessions and a view on community perceptions to help inform Council response to the EIS.

Senior project team members also met with Greater Hume Council on 9th December 2019 to discuss to terms of a prospective VPA. FRV have committed to the Council's request of an increased financial contribution and have agreed for contributions to be in the form of a VPA. Discussions are on-going and a VPA will be finalised in due course.

Following Council's EIS submission, FRV had an telephone conference with General Manager, Steven Pinnuck and Director Environment and Planning, Colin Kane on 18 March 2020 to discuss each point raised in their submission (see section 4.1.3).

In response to BCD's submission on the EIS, NGH sought clarification from BAM Support as to whether or not vegetation inside the development site but is not directly impacted by the proposal, should be included in the BAM Calculator. Advice provided by BAM Support was that it should not (refer Appendix D.3).

Additional consultation was undertaken with DPIE Water and NRAR to seek clarification on waterfront land in relation to Back Creek and Middle Creek. This correspondence is provided in Appendix D.4.

As a specific initiative to collaborate on attaining economic and social benefits from the proposed development, briefings were offered to a number of regionally based government agencies. Initial discussions have been held with the following:

- State Member for Albury, Justin Clancy MP.
- Office of the Federal Member for Farrer, Sussan Ley MP.
- Chair, Murray Riverina Regional Advisory Council, Anthony McFarlane.
- Regional Manager NSW Business Council, Andrew Cottrill,
- Office of the Director Riverina Murray, James Bolton.
- CEO, Regional Development Australia – Murray, Edwina Hayes.

Further groups who have the potential to assist in delivery of economic and social outcomes will be identified as the project progresses.

4. CONSIDERATION OF SUBMISSION

4.1. PROPONENT'S RESPONSES TO SUBMISSIONS

The public submissions received have been divided into the following:

- Individual community members supportive of the proposal.
- Individual community members objecting to the proposal.
- Non-government organisation submissions.
- Government agency submissions.

4.1.1. Submissions from the general public

Many of the public submissions raised multiple issues and many of these issues were raised numerous times. As such, issues raised by individual members of the public have been summarised and addressed in Table 2-1. A response is provided for each issue, not to each submission.

Public submissions in support the proposed Walla Walla Solar Farm

The proposal received a total of 62 letters of support from members of the general public including nine local businesses. Figure 4-1 below illustrates the main perceived benefits raised by public submissions in support of the proposal, with Table 4-1 summarising key discussion points captured. Key discussion points have been summarised/paraphrased to avoid repetition. The information for both this figure and table are provided in terms of the number of responses received for each issue.

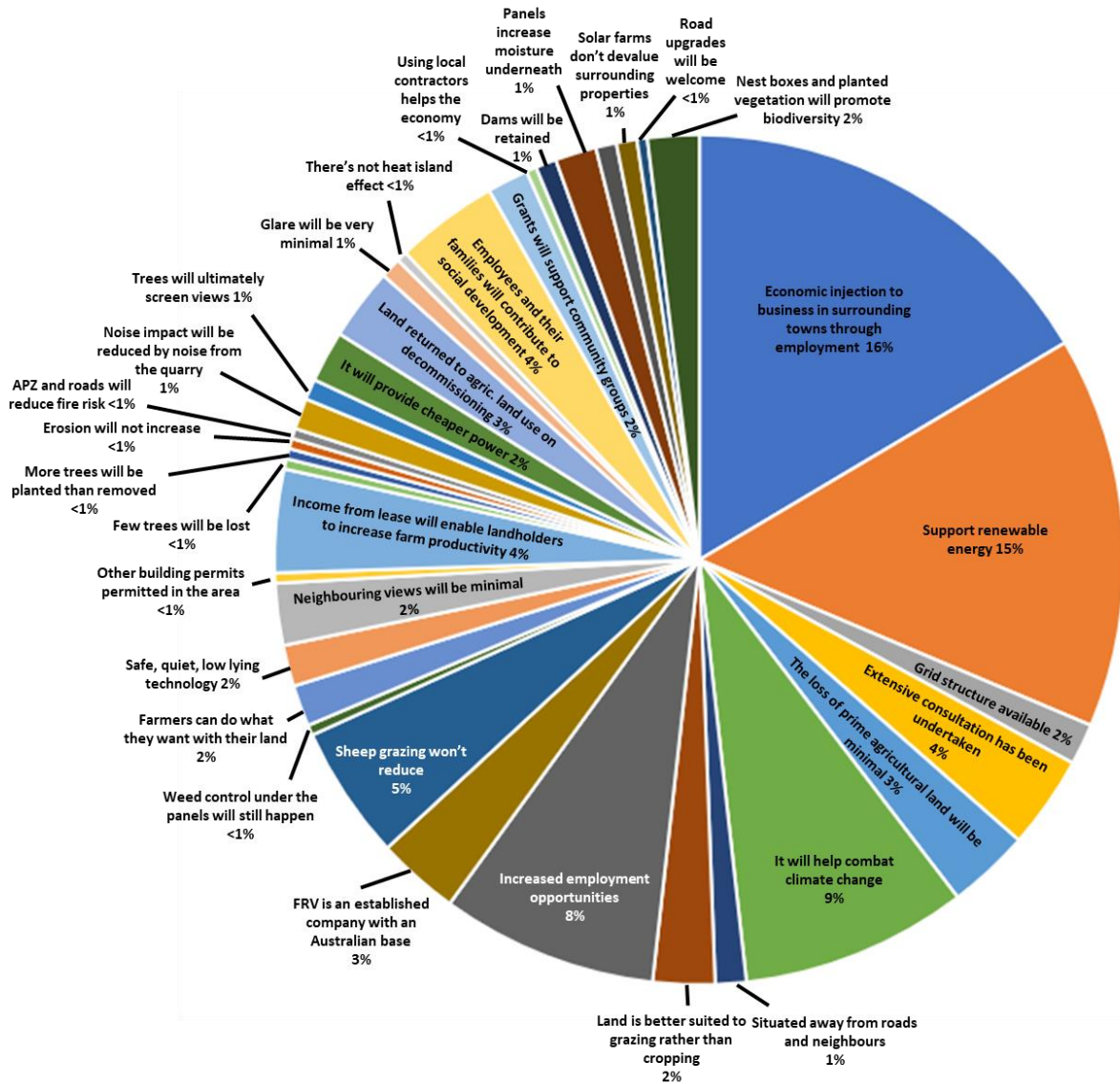


Figure 4-1 Distribution of the perceived benefits of the proposal, captured from individual community members supportive of the proposal

Table 4-1 Perceived benefits raised by individual members of the public supportive of the proposal

Issue	No. responses	Discussion point(s)
Economic injection to business in surrounding towns through employment	42	The proposal would provide a massive economic injection into businesses of the surrounding towns. The certainty of local economic benefits is supported by an economic assessment by Ernst and Young (Appendix O of the EIS).
Support renewable energy	38	The need to reduce greenhouse gas emissions is immediate to combat climate change. Recent bushfire events in NSW highlight the importance of reducing greenhouse gas emissions without delay.
Grid structure available	4	Many objectors agree that there is a need for large-scale solar farms but that they should be located in arid marginal farming areas, however there is no grid infrastructure in these areas to support renewable energy generation. Supporters highlighted that there is no alternative other than to use existing grid infrastructure closer to population centres.
Extensive consultation has been undertaken	9	<p>Both Bison Energy and FRV have undertaken extensive consultation with neighbouring landholders and the broader local communities. Photomontages have been useful tools to manage visual impacts on neighbours and have effectively demonstrated how existing screening and the topography of the land can minimise view of solar farm infrastructure.</p> <p>Following extensive community consultation, FRV has made adjustments to the project to alleviate community concerns including:</p> <ul style="list-style-type: none"> • Setbacks to increase the distancing between infrastructure and residences and local businesses. • Extensive vegetation screens ranging from 5 m to 50 m to conceal views of the solar farm. • FRV offered to plant fast growing vegetation pre-construction (at commercial risk to FRV) to maximise the effectiveness of screening during and post-construction. • Relocated the main access point to the north eastern corner of the development site to minimise traffic impacts on neighbours. • Relocated the substation 100 m south of its original location. • Robust bushfire preparedness measures to maximise the ability to control fires quickly.
Loss of prime agricultural land would be minimal	8	<p>Landowner: “The additional income we receive from the lease of our land...will allow us to further invest in our farm to increase its overall productivity.”</p> <p>The landholders are leasing land to the solar farm with soil too marginal for regular cropping.</p>

Issue	No. responses	Discussion point(s)
The proposal would help combat climate change	22	Once constructed, the solar farm will supply power to households and in this region and across eastern Australia, further reducing the need for fossil fuels like coal and gas.
Situated away from roads and neighbours	3	The land is nestled away from main roads, is near an existing quarry and doesn't have many neighbours.
The land is best suited to grazing rather than cropping	6	The solar farm would enable landholders to cover the cost of improving the productivity of retained land (e.g. in the form of expensive lime and gypsum applications).
Increased employment opportunities	21	<p>The financial position of both companies currently leasing the development site for agriculture production would improve as a result of the proposal. This is because the landowner has been able to invest and enhance other larger areas of his land from the FRV option payments, which as a result will now be able to be cropped, whereas the marginal solar farmland will be predominately sheep grazing.</p> <p>Employment opportunities would go towards offsetting the loss of employment following the recent closure of the Norske Skorge paper mill in Albury.</p>
FRV is a multinational company with an Australian base and are committed to operating the project	8	<p>FRV is a well-established and responsible company. Its business model is to retain and operate the solar farm for its full lifecycle.</p> <p>The proposed site will remain owned by an Australian farming family and will be leased to a company with a proven track record of solar farm construction in Australia.</p>
Sheep grazing won't reduce much	13	As sheep will continue to graze on the solar farm area at about 85% of the normal carrying capacity, the loss of agricultural production will be minimal. Energy generation and agriculture can co-exist.
Spraying/fertilising under the panels will still happen	1	The management of agricultural land beneath the panels will continue.
Farmers can do what they want with their land	4	<p>It has been highlighted that the landholders should be able to do what they please with their land and what better way to use this land than for clean energy generation and sheep grazing.</p> <p>Farmers should be able to insulate themselves against the financial impact of drought and failed crops by diversifying their farming practices.</p>
Safe, quiet and low-lying technology	4	Solar panels are a low lying and quiet energy generation system. When compared with the impact on the landscape and ecosystem from coal mining for energy generation, which destroys and consumes massive amounts of land; solar energy generation comes out on top.
Neighbouring views will be minimal	6	Significant screening buffers are proposed to block neighbours' views. It is common for solar farm developments

Issue	No. responses	Discussion point(s)
		to provide 1 or 2 rows of trees to neighbours for screening. On this project, neighbours within 1 km of the project are offered a 50 m buffer, which includes 6 rows of trees.
Other building permits are underway in the area	1	Of the four solar farms proposed for Greater Hume, this proposal would create the most benefits for the region.
Income received will enable owners to reinvest to lift overall productivity	10	All farms or farming communities have a percentage of land that is not suitable for cropping or heavy grazing.
More trees would be planted than removed	2	In addition to the thick buffer of vegetation around the solar farm, there will also be native vegetation planted around dams, the creation of corridors and placement of 120 nesting boxes to provide habitat for wildlife and promote biodiversity.
Erosion would be no different to normal farming practices	1	The solar farm would only directly impact approximately 15% of the site and would not alter the existing landscape or drainage.
Asset protection zones and internal roads would reduce fire risk	1	Fuel management within the development site, asset protection zones and internal firebreaks mean the proposal would pose less fire risk than neighbouring farms at harvest time.
Noise already experienced from quarry, and it would be short duration	3	Existing noise from the quarry operations is ongoing, whereas noise from constructing the solar farm would be of short duration.
Trees will ultimately provide screening to reduce visual impact	2	Both applicants have undertaken extensive consultation with the wider community. This has culminated in the EIS, which makes further adjustments to the solar farm (including additional tree screening and setbacks) to address the immediate neighbours' concerns particularly in relation to visual amenity.
It will provide cheaper power	5	The proposal would introduce increase competition within the NSW energy market, providing downward pressure for cheaper prices for the consumer.
Upon decommissioning the land can be returned to agricultural use	7	Solar energy is a low impact energy source. It does not destroy the land it is on. In fact, the land can be converted back to 100% farming use in under one season.
Glare would be very minimal	2	The standard for reflectivity is so low that solar panels are installed at airports around the world.
There is no heat island effect	1	One respondent measured the heating impact of solar panels installed on their roof with a laser temperature device. They found that they were the same temperature as the roof tiles, and it was 3°C cooler under the panels than in direct sunlight.

Issue	No. responses	Discussion point(s)
Employees and their families will contribute to local society development	10	Families of those employed will contribute to the development of society through attending school, participation in sporting clubs, use of health and professional services and the purchase of other provisions which will support the continued economic development on the Greater Hume area.
Community grants will support community groups	4	These grants will provide direct funding to community organisations that would otherwise find it difficult to raise funds for local community social activities or improvement of community assets.
Using local contractors contributes to the local economy	1	Construction of the solar farm will provide the opportunity for local construction industry employment and use of the local supplier business for construction of materials and services.
Most dams would be retained	2	15 of the 17 dams across the development site would be retained for wildlife and livestock.
All issues such as visual amenity, loss of trees, fire, erosion have been addressed	4	Key environmental impacts have been adequately addressed in the EIS and through community engagement.
Panels increase moisture under panels through condensation and shading	2	Other farmers with large-scale solar farms on their properties highlight that in drier times their [livestock] carrying capacity is greater than the district average because of the additional growth of pasture from moisture under the solar panels and additional shade.
Solar farms do not devalue surrounding properties	2	The proposal would not impact neighbouring farms. The increase in jobs, rental prices, local trade have been exponential for the micro economy of Coleambally. Walla Walla would be lucky to have this gift.
Local road upgrades would be welcomed	1	Benambra Road already has a lot of truck movements from the quarry and would benefit from periodical maintenance.
Nest boxes and vegetation corridors will help to promote biodiversity	5	Working with local Landcare groups, the project will consider and enhance biodiversity for planting to create corridors, enhancing farm dams and placing nesting boxes throughout the site.

Public submissions in opposition to the proposal

Figure 4-2 below illustrates the main issues raised in the public submissions, with Table 4-2 summarising key discussion points captured. The information for both Figure 4-2 and Table 4-2 are provided in terms of the number of responses received for each issue. A petition objecting to the proposal, under the title ‘Stop Japanese solar farm from being built near Walla Walla, NSW,’ contained 576 signatories. It should be noted this petition was directed at the previous developer, Bison Energy and was completed prior to FRV acquiring the project. A number of these signatories also provided individual submissions.

Table 4-2 Issues raised by individual members of the public opposed to the proposal and associated proponent responses

Issue	No. responses	Details of issue	Response
Visual impact	33	<p>Visual impacts on three uninvolved residential properties including a wedding/ecotourism venue dependent on the surrounding landscape to attract business. One neighbouring landholder with no residence within 1 km may also be impacted.</p>	<p>The proponent respects the views and opinions of the community, and as detailed throughout the EIS and the Visual Impact Assessment (Appendix K of the EIS) has amended the design and location of infrastructure along with proposed extensive vegetative screening to reduce anticipated views of the proposal.</p> <p>Setbacks and screening proposed in the EIS have increased distances between residential buildings and solar farm infrastructure. The closest dwelling R1a is located 80 m from the legal site boundary but would be separated from the development by Benambra Road, roadside vegetation, a small paddock left for horse agistment, 50 m of screening vegetation, a 10 m APZ and at least 5 m additional from the security fence to the panels (approximately 210 m overall).</p> <p>The partial visuals for R2 of the new TransGrid substation was raised. Since acquiring the proposal, FRV has reassessed the development site for the most suitable location for the substation. The decision was made to relocate the substation 100 m south of the original location for the following reasons:</p> <ul style="list-style-type: none"> • This would allow the retention of any existing boundary vegetation which will assist the visual screening for R2. • This would allow room for new additional vegetation screening between the substation and Benambra Road (50 m screening buffer with 6 rows of trees). • Moving the substation further south increases the distance from R2 without raising the substations elevation. Further south has higher topography and therefore would in fact increase the substation visibility within the area. <p>Reducing the disturbance to R1 and R2 arising from construction traffic was a key consideration in the decision to have a single construction access point located at the north eastern corner of the development, which would intrude on local roads from Olympic Highway as little as possible. The change in site access, now means the closest receptor to this entry point is over 1.4 km away (previously less than 300 m away).</p> <p>Orange Grove Gardens (R5a) is located approximately 820 m from the development site boundary and is already partially screened by existing vegetation. FRV is confident that the inclusion of a 50 m vegetation buffer along the southern boundary of the development site, would obscure the majority of remaining visible infrastructure within five to eight years. FRV offered to plant fast growing tree species over winter 2020, to provide</p>

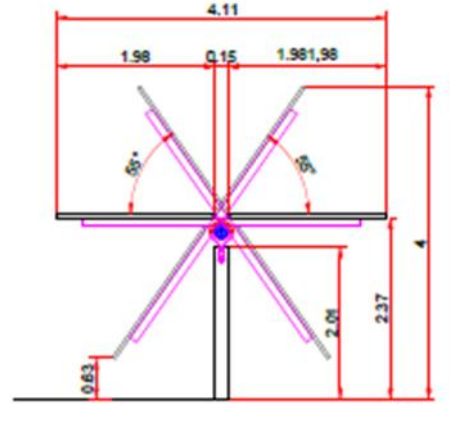
Issue	No. responses	Details of issue	Response
			<p>additional growth time and therefore more established screening to neighbours but this offer was declined. FRV has also sought advice on the option and value of planting larger mature trees from Jayfields Nursery. The professional opinion of Jayfields Nursery detailed that this would be a 'futile' option and in their 'experience leads to very high plant loss and much weaker growth pattern,' (see Appendix D.5).</p> <p>As a result of considerable consultation and investigation of alternatives, FRV has decided to implement an additional setback for Orange Grove Gardens at the south eastern corner of the development site so that the total distance between the venue and any solar farm infrastructure would be increased to 1200 m. The south eastern corner now devoid of solar arrays would be cropped by the landholder to retain the agricultural ambience of the region. Orange Grove Gardens will therefore be able to continue benefiting from the views overlooking agricultural land at the south eastern corner of the development site.</p> <p>The proposed screening was determined after consultation with affected residences and their raised concerns, Holbrook Landcare and with plant species selected on the advice of a local grower of indigenous species and vetted by the BDAR.</p> <p>Detailed mitigation measures for each of the near neighbours have been provided in Appendix G.</p>
Temperature increases and radiant heat effects	36	<p>Changing climatic conditions for the township and surrounds</p> <p>The solar farm will increase temperatures around the proposal (heat island effect). This will make living unbearable, increase people's electricity bills due to increased use of air conditioners and cook people's gardens.</p>	<p>A recent study carried out on the Shepparton Solar Farm in Victoria detailed that the potential increase in temperature within the solar project is marginal and any temperature increase within the solar array decreases from the boundary (Barron-Gafford <i>et al</i> 2018). This study recommended a 30 m setback from any neighbouring property boundary and a vegetation buffer from ground level to higher than the top of the highest point of the array to mitigate potential heat island effects.</p> <p>Although not required by DPIE guidelines, FRV have incorporated a 30-metre setback from the edge of the closest solar panels and the boundary of any adjacent farming property, as well as incorporated an extensive vegetative landscaping plan, to accommodate the neighbours' concerns regarding the perceived heat island effect.</p> <p>The research also indicates a small potential effect on microclimate within the solar facility. This effect may actually enhance retention of ground cover in very cold or hot conditions onsite.</p>

Issue	No. responses	Details of issue	Response
			<p>Refer to section 6.3.2 of the EIS for more information.</p> <p>It is also noted, the article on heat island effects used as an example in the public submission is also out-of-date and uses an example of a solar farm in a semi-arid desert ecosystem in the United States. This report is not indicative of the conditions at the proposal in Walla Walla. The journal on which the article is based on is also referenced and described within the EIS, comparing results of this journal with an updated journal about an Australian based solar farm from the same author.</p>
Weeds and pest animals	21	<p>Weeds such as hairy panic would build up against security fencing creating a fire hazard.</p> <p>Kangaroos would be chased out of the development site and increase the grazing burden on surrounding properties.</p> <p>Weeds wouldn't be properly managed within the development site by the proponent.</p>	<p>The proponent has committed to preparing and implementing a Pest and Weed Management Plan to manage the occurrence of noxious weeds and pest species across the site during construction and operation. The plan will be prepared in accordance with Greater Hume Shire Council and DPIE requirements, and best practice pest control. Pest control will be adapted where required to suit the operating limitations of the site.</p> <p>Where possible, the Pest and Weed Management Plan would also integrate weed and pest management with adjoining landowners.</p> <p>The proponent has also committed to developing and implementing a Groundcover Management Plan to ensure perennial grass cover is established across the site as soon as practicable after construction and maintained throughout the operation phase.</p> <p>It is in the best interest of the proponent to manage the land, its infrastructure and its overall investment. The land must be maintained and managed in compliance with the Conditions of Consent imposed by DPIE and any Statement of Commitment proposed within the EIS and subsequent management plans.</p> <p>Failure to do so can result in large penalties and enforcement regimes under the <i>Environmental Planning and Assessment Amendment Act 2014</i>.</p> <p>Compliance is ensured through independent auditing of the construction, operation and decommissioning of a proposal, which must be reported back to DPIE.</p> <p>The proponent also has a strict 'wash down' protocol in place for any contractors or employees attending site.</p>
Effects on local businesses	48	Changing the land use of the development site would have a flow on effect of costing local businesses (particularly agribusinesses) revenue.	Potential impacts on the local economy have been addressed in section 6.4 of the EIS. Ernst and Young assessed the likely impacts on the local economy and concluded that these impacts would be beneficial (see Appendix O of the EIS).

Issue	No. responses	Details of issue	Response
		<p>Farming contractors could lose opportunities to sow and harvest crops, transport grain, hay and livestock etc.</p>	<p>The development site includes sections of two privately owned mixed cropping and grazing farms. Both farms are currently family operated. During specific times of the year, contractors are engaged to assist with sowing and harvesting. These activities are seasonal and would typically employ several people. Limited additional employment is supported through local transportation services and processing (cattle, sheep and grain). In an employment context, approximately 21 FTE jobs created to support solar farm operations, 16 of which are expected to be local. Approximately 85% of the sheep grazing productivity would be maintained within the development site, thus continuing to support connected service providers such as veterinarians, shearers, farmhands, transportation etc.</p> <p>Providing jobs and sources of income independent of agriculture, has the potential to lessen the blow to commercial and retail businesses during droughts or other low agricultural productive years in small regional towns because household disposable income across the community becomes more stable.</p>
Removal of trees	41	<p>The proposal would require 53 paddock trees to be removed to make way for solar farm infrastructure. Some of these trees are large mature trees, beautiful in their own right but also have the potential to support biodiversity, mainly birds, microbats and invertebrates.</p>	<p>Protecting biodiversity is a key priority for the proposal and the development layout has been designed balancing biodiversity and commercial objectives to achieve as little biodiversity trade off as practicable. Since acquiring the proposal, FRV have sought to reduce the number of trees removed but have prioritised maintaining habitat connectivity over isolated paddock trees, so that habitat for targeted threatened species such as Squirrel Gliders and owls are preserved if not enhanced. FRV has committed to install approximately 120 nesting boxes across the development site to minimise the loss of these trees on local wildlife. Additionally, FRV intends to plant very large (up to 50 m) screening strips along much of the development site's boundary comprising native eucalypts and mid-storey shrubs. Screening vegetation would be maintained (i.e. dead trees would be replaced) over the life of the proposal. FRV does not only want to minimise adverse impacts on biodiversity but rather wants biodiversity to be better off as a result of the proposal. A strategy for achieving this objective is set out in the Biodiversity Enhancement Plan, developed by Holbrook Landcare and provided as Appendix I of the BDAR.</p>
Flooding and erosion	17	<p>Solar farm infrastructure would alter the flow of water from the development site, exacerbating the damage from floods on neighbouring properties.</p>	<p>A flood study assessing flood risk to the proposal, local roads and neighbouring properties was completed by GHD and is provided as Appendix J of the EIS. This report modelled the likely extent and level of inundation under 5% AEP, 1% AEP and PMF flood</p>

Issue	No. responses	Details of issue	Response
			<p>events concluding that 15%, 31% and 72% of the development site would be affected, respectively.</p> <p>The report considered the proposed infrastructure to be installed and concluded that this would not modify the existing water flows across the site. Flood-safe fencing would be installed at either end of Back Creek to ensure that the flow of water is not restricted.</p> <p><i>“Where the perimeter fencing crosses the proposed 5% AEP flood extent zone, it is proposed that the lower portions of the fence will consist of a hinged type flood gate arrangement. The flood gates will be free to pivot outwards in the downstream direction and allow debris to pass downstream underneath the flood gate, thereby minimising the risk of debris becoming trapped and obstructing floodwater.”</i></p> <p>The impacts of the inverter stations on flooding conditions are expected to be acceptable for the following reasons:</p> <ul style="list-style-type: none"> • Inverter stations will be predominantly located outside the 5% AEP inundation extent zone. • Any localised increases in flood level are expected to largely dissipate within the development property. • There is no existing flood sensitive development within the adjoining properties near either Back Creek or Middle Creek. <p>The design intent of the solar panels and their supports will be to minimise the potential for floodwater obstruction (refer to Section 5.3.3). This will be achieved by:</p> <ul style="list-style-type: none"> • Positioned of the solar panel fields predominantly outside the 5% AEP flood extent. • Ensuring that the horizontal support frame members and the solar panels themselves are elevated above the 1% AEP flood level when in a horizontal pivoted position. • The low density of the vertical member pile supports. • Given the above design approach, the solar panels and their support frames are expected to pose a very limited risk in relation to altering off-site flooding conditions. <p>Access roads would be constructions following GHD’s recommendations:</p> <ul style="list-style-type: none"> • Access roads located within the 1% AEP inundation extents should not be raised more than 100 mm above the adjoining ground surface level.

Issue	No. responses	Details of issue	Response
			<ul style="list-style-type: none"> Access roads located within 100 metres of the upstream property boundaries (Back Creek – eastern boundary, Middle Creek – southern boundary) should not be raised more than 60 mm above the existing ground surface. <p>The substation would be located outside the PMF. Flooding and water erosion are addressed in section 6.7 of the EIS.</p>
Salinity from tree removal	5	Removing large paddock trees would cause the water table to rise resulting in dryland salinity.	McMahon Earth Science were engaged to complete a soil assessment in preparation of the EIS. This assessment included collecting and analysing 30 soil samples from across the development site. This soil assessment concluded that the subsurface soil salinity was very low. An absence of salt below the surface means that salinity will not occur in the event of the water table rising as a result of tree removal.
Fracturing the community	28	Impacts to the relationships within the community were not explored when discussing site suitability and justification.	The proponent completed thorough community engagement with the local community as detailed in the Community and Stakeholder Engagement Report (CSER) provided in Appendix B.2 of the EIS including but not limited to multiple face to face meetings with near neighbours and four community open days.
Glare	12	Glare and reflection from the panels will be uncomfortable and reduce saleability of properties	<p>The potential for glare associated with non-concentrating photovoltaic (PV) systems that do not involve mirrors or lenses is limited. PV solar panels are designed to reflect as little sunlight as possible, resulting in negligible glare or reflection as their purpose is to absorb the sunlight. The panels will not generally create noticeable glare compared with an existing roof or building surface as seen on the ground.</p> <p>In addition to this, seen from above (such as from an aircraft) they appear dark grey and do not cause a glare or reflectivity hazard. Solar PV farms have been installed at numerous regional and international airports such as Albury, Darwin and Melbourne airports.</p> <p>Infrastructure would be relatively dispersed and unlikely to present a glare or reflectivity hazard to residences, motorists or aircraft.</p> <p>Panels are also mounted on a single axis tracking system, arranged in an east-west direction. As such, any residences located to the north or south of the proposal will not receive any reflection or glare from solar panels.</p>

Issue	No. responses	Details of issue	Response
			<p>Residences located east or west of the proposal will receive limited glare or reflection, due to the maximum tilt of 60° of the panel and location of the sun.</p>  <p>Image depicting the tilt angle of proposed single axis tracking system</p>
Noise	23	Two residences (R1a and R1b) are currently occupied, one with young children, the other with elderly disabled tenants. Both have expressed concerns about noise.	<p>A desktop noise and vibration assessment has been undertaken as part of the EIS based on modelling under guidance of the Interim Construction Noise Guideline (ICNG).</p> <p>The assessment states that there will be some noise exceedances during construction of the proposal for residences within closest proximity. However, these exceedances would occur over a short-term, during normal working hours. The maximum duration that affected residents would be likely to experience worst case construction noise is 8 hours in a day. Such activities would move progressively across the site, meaning that at any one receiver worst case construction noise would typically last for 3-4 weeks only.</p> <p>The largest exceedance modelled using the three noisiest plant operating concurrently for any given residence was 68 dB(A) (23 dB(A) above noise management levels). Consultation, notification and engagement with the community will occur prior to and during noisy construction activities.</p>

Issue	No. responses	Details of issue	Response
Air pollution during construction, and afterwards during a fire (including dust)	44	<p>Dust during operations would impact neighbouring properties.</p> <p>Shading by the solar panels would prevent the establishment of groundcover leaving to ongoing dust problems during operations.</p>	<p>The noise assessment within the EIS provides a suite of safeguards and mitigation measures to reduce any potential noise or vibration impact. Refer to section 6.5 of the EIS for more information.</p> <p>Dust generation would accompany excavation and other earthworks as well as the movement of trucks and work vehicles along any unsealed road during construction and decommissioning of the proposal.</p> <p>Earthworks associated with construction are also relatively minor and not likely to cause significant dust or emissions. The construction of the solar arrays uses a piling machine which is designed to reduce soil disturbance and corresponding dust pollution.</p> <p>The proponent has made a commitment to manage and prevent dust from leaving the development site, which includes covering loads and watering of unsealed roads and stockpiles. Dust will be monitored daily, with construction works to cease if dust is unmanageable and observed being blown from the site.</p> <p>The solar array would be mounted above ground and would enable groundcover species to persist during operation. Suitable perennial groundcover such as lucerne and clover species would be maintained beneath the panels and grazed to reduce biomass for bushfire management. Sheep grazing would also maximise efficient use of the land. Groundcover grass species would be selected which are tolerant of limited shading conditions and suitable for the soil type and climate at the development site.</p>
Poor community consultation	1	<p>Some members of the community believe that community engagement for the proposal would have been better if meetings were facilitated differently and refreshments weren't provided to distract attendees. Four community meetings were held in Walla Walla and Culcairn in preparation of the EIS. Two of these meetings were facilitated as information sessions where questions were taken following a presentation by the proponent.</p>	<p>Four community open days were held in Culcairn (by previous developer) and Walla Walla (by FRV) concurrently in preparation of the EIS. These community meetings and one-on-one conversations with neighbouring land holders resulted in numerous modifications to the proposal design including setbacks and screening, bushfire preparedness, increasing the number of dams and trees retained etc. FRV held two public meetings towards the end of the design phase in order to inform interested communities about changes that had been made and to listen to remaining concerns and suggestions.</p> <p>Through the engagement process, FRV recognised that many people attending the meetings would have similar questions and concerns. Presenting an overview of the proposal's layout and design, served the purpose of answering many of these questions and providing general information about the project. Following the presentation, key FRV</p>

Issue	No. responses	Details of issue	Response
			<p>personnel were available to have one on one conversations with members of the community, this included Head of Development and Head of Construction.</p> <p>Refreshments were provided at the evening session, as the time of this session is a normal mealtime for many people. FRV used local catering for the event.</p> <p>FRV have valued the input of the community, and the value of this input is demonstrated in the design changes and mitigation measures that arose from these sessions.</p>
Loss of prime agricultural land	80	<p>The land on which the proposal is situated is classed as Land Soil Capability Class 4 and 6 under the Land and Soil Capability Assessment Scheme (OEH 2012), which is defined as high capability.</p> <p>As identified in the NSW Government Large Scale Solar Energy Guideline for State Significant Development (2018), land classed as high capability (Class 1, 2 or 3) is identified as a key constraint and should be given consideration of any fragmentation or displacement of agricultural activities.</p>	<p>Grain yields are not simply a result of soil type and rainfall but also require inputs such as seed, fertiliser, herbicide and soil conditioners. These inputs can be an expensive limiting factor of how much of their land and landholder decides to cop in any given year.</p> <p>The subject land is owned by two landholders who have decided to lease part of their properties for the proposal for the next 30 years. This was a commercial decision between FRV and the landholders who would now have a supplementary income, that can, if they choose, be reinvested into their agribusinesses to increase the production capacity of land of these two farms retained solely for agricultural land use.</p> <p>After the period of operation of the solar farm the land will be reinstated so that farming can recommence over the land. The production capability of neighbouring properties would not be impacted.</p> <p>Section 2.5 of the EIS discussed the suitability of the site and constraints under the NSW Large-scale Solar Energy Guidelines for State Significant Development. The assessment concludes that:</p> <ul style="list-style-type: none"> • There is no high visibility. • Minimal impact to biodiversity will be encountered. • There is no development in a residential zone or urban area. • The land is not prone to fire or flood. • There are no prospective resource developments. <p>The assessment identified Class 4 and 6 Agricultural Land as a consideration for site suitability. These constraints are further discussed and mitigated throughout the EIS.</p> <p>Potential adverse impacts on the community are instead discussed in section 6.4.2 of the EIS. Some likely adverse impacts identified to the community include:</p> <ul style="list-style-type: none"> • Increases in local traffic and subsequent road hazards.

Issue	No. responses	Details of issue	Response
			<ul style="list-style-type: none"> • Change in the rural landscape character and visual amenity. • Influx of workers putting pressure on local accommodation, health and broader services. • Demand for accommodation and increases in traffic may impact on tourism is construction coincides with local festivals or events. <p>It was determined that the proposal would have a positive socio-economic impact given the significant economic boost the proposal would generate. It is considered that the expected adverse impacts would be minimal given the temporary nature of the construction phase and that impacts would be managed through the implementation of safeguards.</p>
Loss of flora and fauna habitat	34	Many big trees marked for removal could be hundreds of years old. Proposed tree planting would not produce hollows for many decades. The proposal would adversely impact threatened species including the White-browed Warbler, Diamond Firetail Finch, Squirrel Gliders and many parrots.	FRV is a renewable energy provider that takes its impact on the environment seriously. Any potential impacts on threatened species were identified in section 6.8.5 of the EIS and addressed through project design modification and other mitigation measures listed in section 8 of the BDAR. The overall positive benefits to local biodiversity that would be implemented across the development site including but not limited to: installing approximately 120 medium sized nesting boxes for birds and Squirrel Gliders, improving the connectivity of Squirrel Glider habitat, keeping livestock outside the riparian zone of Back Creek to allow tree regeneration and restoration of middle storey vegetation, planting substantial strips of screening vegetation including food trees for nectar feeding birds and mammals. FRV intends to leave local biodiversity in a healthier position than it is currently.
Loss of Aboriginal and cultural heritage sites	9	Aboriginal artefacts and cultural sites would be lost or damaged as a result of the proposal.	<p>The ACHAR was prepared in accordance with:</p> <ul style="list-style-type: none"> • <i>Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW</i> (OEH, 2011). • <i>Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales</i> (OEH, 2010a). • <i>Aboriginal cultural heritage consultation requirements for proponents 2010</i> (OEH, 2010b). <p>Disturbed artefacts would be carefully removed and reburied elsewhere within the development site. The two scarred trees and three cultural trees would not be impacted by the proposal.</p>

Issue	No. responses	Details of issue	Response
Foreign ownership of solar companies	18	Australia is losing too much land and too many resources to overseas companies.	FRV will not own the land. Under the proposal, FRV would only lease the development site for the life of the proposal from two landholders who would retain their ownership of the land. The landowners would retain the option to use the land under and around the panels for sheep grazing.
Devaluing properties	28	<p>The proposal will devalue the surrounding properties and reduce saleability due to the views.</p> <p>Feedback from local real estate indicate that the property would be worth significantly less.</p> <p>Devaluation of land also restricts the value of future borrowing capacity.</p>	<p>Operational solar farms are low lying and benign developments. In 2016, the NSW Office of Environment and Heritage (OEH) commissioned an independent study into the potential impacts of wind farm developments on property prices in NSW (Urbis, 2016). There was insufficient sales data to provide a definitive answer, therefore the study was based on the best available data and traditional valuation sales analysis techniques to compare the change in values around wind farms over time and qualitative information from a review of the international literature on the impact of wind farms on property values.</p> <p>Based on the outcome of the study, it was determined that wind farms may not significantly impact the value of rural properties used for agricultural purposes, with no or limited definable impacts.</p> <p>As solar farms do not have the same large-scale impacts as wind farms (i.e. landscape views, shadowing, light flicker etc.), the impact on property values are anticipated to be substantially less. Mitigation measures in the form of vegetative screening and offsetting infrastructure from residences is an effective method to obscure views of the proposal. No reliable assessment can be made with regard to the utility scale solar sector which is in its relative infancy.</p> <p>JLL Valuations and Advisory – Agribusiness were engaged to assess how the proposal might affect the value of surrounding properties.</p> <p><i>“Our study of the agricultural market value trends within 30 km radius of the proposed Walla Walla Solar Farm indicates the predominant landowner type comprises family farmers and larger scale corporate farming entities. As a result, the drivers for the local land market are primarily those surrounding the production of livestock, cereals and oilseeds.”</i></p> <p><i>“Within the subject market, buyer demand and market sentiment has been high and has driven significant growth over the past three years. The majority of this value growth has been driven by corporate and family scale primary producers seeking to increase the scale of their current enterprises on the back of several years of favourable commodity</i></p>

Issue	No. responses	Details of issue	Response
			<p>prices, particularly in the beef and lamb sectors. A secondary influence has been producers seeking to enter the region from other drought affected areas of northern NSW and Queensland.”</p> <p>“Given the primary drivers of value within the subject market are related to agricultural production, we consider the proximity of the proposed Walla Walla Solar Farm” would be a low level consideration of owners and prospective purchasers of land in the area and unlikely to influence land value trends.”</p>
Restricts future growth of Walla Walla	10	The size of solar farms planned for the area would compromise future growth of Walla Walla.	The population of Walla Walla in 2016 was 836 people (ABS 2016). FRV estimates that their annual expenditure for operating and maintaining the solar farm would be approximately \$10 million. This includes creating 16 FTE local jobs. This investment represents a substantial economic boost for a town the size of Walla Walla. The development site is located 4.3 km from the Walla Walla townsite and there is no urbanisation plan in place within 4 km of the proposal
Proposal doesn't give adequate details of the proximity to the township	7	Proposal doesn't give adequate details of the proximity to the township	The proximation of the proposal to the Walla Walla and Culcairn townships is clearly shown in Figure 1-1 of the EIS and noted throughout the EIS.
Increased bushfire risk	44	The proposal would increase the risk of bushfire for surrounding landholders.	The EIS was developed in consultation with neighbouring landholders, local RFS brigades and <i>Planning for Bushfire Protection: a guide for councils, planners, fire authorities and developers</i> (NSW Rural Fire Service, 2019). The proposal was modified to substantially reduce bushfire risk entering or leaving the development site including four additional emergency access points, 12 x 20,000 L water storage tanks, two metred points to access scheme water directly from the Riverina Water pipeline, 10 m APZ, outside the perimeter fence and commitments to manage the fuel load across the development site for the life of the solar farm. FRV is confident that they have done everything practicable to ensure that the risk of fire to the proposal and surrounding properties has been minimised. Under the proposal, the development site would have more fire prevention and mitigation measures than it has in place currently and full time staff to monitor it.

Issue	No. responses	Details of issue	Response
Insurance issues	20	The insurance policies of surrounding landholders would be affected by having such a valuable asset nearby. Landholders are worried about liability if a fire starting on their land enters the solar farm and causes damage.	<p>This concern was addressed in section 5.4.3 of the Community and Stakeholder Engagement Report (CSER) provided in Appendix B.2 of the EIS. FRV contacted the Insurance Council of Australia, who highlighted at this was a new issue for them and they needed to consult widely before providing a response.</p> <p>The majority of underwriters signalled that the proximity of the solar farm would, on present understanding, not influence a decision to underwrite, nor would it impact the quantum of the risk premium.</p> <p>The Insurance Council of Australia noted that they are unaware of any mandated requirement for a rural policyholder to increase liability coverage in these instances.</p>
Traffic management and road damage	25	The high traffic demand on local roads during the construction period would lead to congestion, decreased safety and damage to local roads.	Ontoit completed a traffic impact assessment, which was provided as Appendix F of the EIS. RMS and Council were both consulted in preparation of the traffic, transport and safety (section 6.6) of the EIS, and the safeguards and mitigations relating to upgrades, road maintenance and road safety have been further updated to meet additional requirements of RMS and Council (see section 0 of this RTS).
Work hours disturbing tranquillity	7	Noise from the proposal (particularly during construction) would disrupt the tranquil country setting.	<p>Normal work hours for the proposal would be 7.00 am to 6.00 pm Monday to Friday and 7.00 am to 1.00 pm on Saturdays, or as otherwise agreed by DPIE.</p> <p>Noise and vibration impacts of the proposal are addressed in section 6.5 of the EIS. Three construction noise scenarios looked at worst case impacts on the four uninvolved residences within 1 km of the proposal (including Orange Grove Gardens wedding venue and ecolodge). The noise assessment concluded that R1a and R1b would experience some exceedances under certain construction scenarios. FRV have worked closely with R1 and have implemented standoff distances to mitigate noise impacts (refer Figure 2-3).</p> <p>No residence would be 'highly noise affected' (as defined by the ICNG) under any noise scenario either during construction or operation of the proposal.</p>
Filling in dams	4	It does not make sense to fill in existing dams that currently supply reliable water source for stock and wildlife. How would sheep grazing under the panels obtain water? The lack of dams would	17 farm dams are present across the site, holding varying volumes of water, in varying condition. Man-made drains also occur in the lower lying areas of the property, designed to shed water to the drainages and assumed to abate waterlogging in the paddocks. FRV

Issue	No. responses	Details of issue	Response
		increase the volume and speed of run-off, increasing the risk of erosion.	<p>have designed the proposal to retain 15 out of the 17 dams on site. 10 of these dams would be planted with riparian vegetation for wildlife.</p> <p>Sheep grazing under the dams would have access to water from troughs provided and some access to retained dams (limited to areas not fenced off to protect planted riparian vegetation).</p> <p>A flood study prepared by GHD for the proposal is provided in Appendix J of the EIS. The proposal would not alter the existing drainage of the development site and is unlikely to increase water erosion.</p>
Disposal of panels upon decommissioning, and construction waste	9	Please confirm whether the components of the solar farm would be recycled, and who is responsible for putting the land back to how it was.	<p>The life of the proposal, based primarily of the life expectancy of the solar panels, is thirty years. Over the past thirty years, community expectations, laws, technology and available goods and services have changed markedly. As such, it would be misleading to assume that the destinations of recycled materials are not going to change over the coming decades. FRV can confirm, however, that the component materials of the solar panels, frames and inverter stations are fully recyclable. Only some thin film panels contain heavy metals such as cadmium. The type of panels used by FRV do not contain heavy metals. FRV has committed to require contractors to deliver materials in fully recyclable cardboard (not plastic) packaging.</p> <p>Further details are provided in section 7.5.2 of the EIS.</p> <p>At the end of the operating period of the proposal, a Rehabilitation and Decommissioning Management Plan would be prepared and implemented by the proponent in consultation with DPIE and the landowners. The Rehabilitation and Decommissioning Management Plan is to include:</p> <ul style="list-style-type: none"> • Removal of all infrastructure. • Removal of gravel from internal access tracks where required, in consultation with landowner. • Reversal of any compaction by mechanical ripping. • Indicators and standards to indicate successful rehabilitation of disturbed areas. These indicators and standards would be applied to rehabilitation activities once the solar farm is decommissioned. <p>Certain aspects of the development may be retained by mutual agreement with the landowner at time of decommissioning.</p>

Issue	No. responses	Details of issue	Response
Loss of local employment through effects on local businesses	24	There would be loss of local employment, including on neighbouring farms, Orange Grove Gardens function centre and in town, with only minimal staff required at the solar farm during operation.	<p>Refer to section 3.7 of the EIS for more information.</p> <p>The balance of employment opportunities anticipated from the proposal has been addressed in section 6.4 of the EIS.</p> <p>The development site includes sections of two privately owned mixed cropping and grazing farms. Both farms are currently family operated. During specific times of the year, contractors are engaged to assist with sowing and harvesting. These activities are seasonal and would typically employ several people. Limited additional employment is supported through local transportation services and processing (cattle, sheep and grain). In an employment context, the loss of jobs associated with the reduction of agricultural activities would be replaced by approximately 21 FTE jobs created to support solar farm operations, including 16 local jobs. Approximately 85% of the sheep grazing productivity would be maintained within the development site, thus continuing to support connected service providers such as veterinarians, shearers, farmhands, transportation etc.</p> <p>Providing jobs and sources of income independent of agriculture, has the potential to lessen the blow to commercial and retail businesses in small regional towns because household disposable income across the community becomes more stable.</p> <p>Following submissions expressing concern about the potential visual impacts on the Orange Grove Gardens business, FRV has implemented a further setback on the south eastern corner of the development site so that the total distance between the wedding venue and any solar infrastructure increases to 1200 m. The south eastern corner devoid of solar infrastructure would now be retained to be cropped by the landowner to retain the agricultural ambience of the region.</p>
Limited capacity in the transmission lines for the power generated	2	<p>There is no guarantee that the existing Jindera to Wagga Wagga TransGrid transmission has the capacity to consistently accept another 300 MW of electricity</p> <p>The community does not want a solar farm that is not operating at capacity.</p>	<p>Throughout the design and approvals stage of the proposal, FRV has been liaising closely with TransGrid. As an experienced international developer of large-scale solar farms, FRV has completed a financial viability assessment for the proposal and is confident that it would function at or near capacity for the duration of the operational life.</p>

Issue	No. responses	Details of issue	Response
It is a major industrial plant, not a farm	4	The name 'solar farm' is misleading as the infrastructure more closely resembles heavy industry than agriculture.	<p>The development site would become dual purpose: electricity generation and agricultural, rather than move from agricultural to solely energy generation.</p> <p>FRV have projects in Australia and across the world of dual-purpose land use, and successful sheep farming under solar infrastructure albeit at a slightly lower stocking rate.</p> <p>Grazing of sheep within these solar farms has proved to be an effective control method for vegetation growth including weeds and provides shelter to grazing stock.</p> <p>Operational impacts to soil and pasture grasses have been identified and addressed in Section 7.2.3 of the EIS.</p> <p>However, the proponent has committed to developing and implementing a Groundcover Management Plan in consultation with a soil scientist and/or an agronomist and taking account of soil survey results to ensure perennial grass cover is established across the site as soon as practicable after construction and maintained throughout the operation phase. The Groundcover would cover:</p> <ul style="list-style-type: none"> • Soil restoration and preparation requirements. • Species selection. • Soil preparation. • Establishment techniques. • Maintenance requirements. • Perennial groundcover targets, indicators, condition monitoring, reporting and evaluation arrangements: <ul style="list-style-type: none"> ○ Live grass cover would always be maintained at or above 70% to protect soils, landscape function and water quality. ○ Any grazing stock would be removed from the site when cover falls below this level. ○ Grasscover would be monitored on a fortnightly basis using an accepted methodology. • Contingency measures to respond to declining soil or groundcover condition. • Identification of baseline conditions for rehabilitation following decommissioning. <p>The management plan and mitigation measures would ensure the best outcome for potential sheep grazing and retention of groundcover on-site.</p>

Issue	No. responses	Details of issue	Response
Lack of background information on the company(s) involved	2	The community wants information about FRV, and any other companies involved.	<p>FRV is a global company with over 40 operational renewable energy projects across the world including four operational utility solar farms across Australia and an additional two projects under construction. FRV has a solid track record of successful project financing of more than US \$3 billion with the financial support of twenty of the world's leading financial institutions.</p> <p>FRV is a stable and experienced operator of solar farms that intends to oversee the proposal through all stages of the project's lifecycle including construction, operation and decommissioning. This commitment has been consistently communicated by FRV at community meetings, written material and project website. FRV is committed to building, owning and maintaining the proposal for its entire lifecycle. This is a strategic shift by FRV globally and demonstrates that the company values its assets.</p>
Bribing communities with offers of financial contributions	3	The Community Investment Programme offered focuses people's attention away from the solar farm proposal itself. It looks like an attempt to bribe the community.	As an owner/operator of large-scale solar farms, FRV intends to function as a member of the local Walla Walla/Culcairn community for the life of the proposal. In addition to providing local employment opportunities, a Community Investment Programme provides an avenue for supporting community groups, education institutions and local associations. FRV have committed to enter into a VPA with Council, which will also provide valuable funding for regional infrastructure and services.
Health impacts on neighbours	18	What chemicals are used in the panels? Do the panels release gas or are there any materials that could produce toxic smoke in the event of bushfire? What are the health effects of electric magnetic fields (EMFs)?	<p>The solar panels are constructed of glass (silica), with common metals such as aluminium and copper wiring. This type of panel does not contain heavy metals such as cadmium or other potentially toxic substances and hence they pose little threat of site contamination should they be exposed to fire or weathering.</p> <p>Research into photovoltaic solar arrays indicated that magnetic fields are significantly less for solar arrays than for household applications. Research found magnetic fields from solar arrays were not distinguishable from background levels at the site boundary, suggesting the health risk of electric magnetic fields (EMFs) from solar arrays is minimal.</p> <p>In Australia, transmission lines and other electrical devices and infrastructure, including switching stations and substations, operate at a frequency of 50 Hz. This frequency falls within the extremely low frequency (ELF) range of 0-300 Hz.</p> <p>The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) advises that 'current science would suggest that if any risk exists, it is small'.</p>

Issue	No. responses	Details of issue	Response
			<p>The site is surrounded by agricultural land. Public access would be restricted by fencing around the site including the switching station during the operational phase. Given the levels associated with the infrastructure components, and the distance to the site perimeter fence, EMFs from the solar farm are likely to be indistinguishable from background levels at the boundary fence. The underground cabling would not produce external electric fields due to shielding from soil, and its magnetic fields are expected to be well within the public and occupational exposure levels recommended by ARPANSA and ICNIRP.</p> <p>ICNIRP sets out a number of protective measures to reduce personal harm from EMFs if the basic restrictions are expected to be exceeded (detailed within Section 7.6.6 of the EIS). These include engineering design, administrative controls and personal protective clothing. The works undertaken for the proposed solar farm are not expected to exceed the basic restriction levels.</p> <p>Refer to section 7.4.4 of the EIS for more information.</p>
No measurable benefits of solar energy	1	Renewable electricity is not better than other sources of electricity.	The measurable benefits of solar energy and the proposal's potential contribution towards Australian and State Government renewable energy plans are discussed at length in section 2.2 of the EIS.
False land capability mapping used in the decision making process	6	Outdated and inaccurate soil data was used to assess land capability with the SEARs referring to this land as class 4 and class 6 under the Land and Soil Capability Assessment Scheme.	<p>The site is not mapped as being Biophysical Strategic Agricultural Land (BSAL).</p> <p>The EIS used existing Soil Capability Assessment Scheme map data for the subject land in accordance with the <i>Large-scale Solar Energy Guideline</i> (DPE 2018) which maps the development site as Class 4 and Class 6 land. FRV are aware that members of the community believe that this data is inaccurate and have acknowledged this in the CSER and section 6.3 of the EIS:</p> <p><i>"As the land capability classification system is under review, adjacent land use has been taken into account to assess agricultural capability."</i></p>
Soil contamination from the panels	2	The Hazard Analysis and Critical Control Points Management System (HACCP) ensures food safety is in line with international practices. The removal of all infrastructure is not practical and will not meet the HACCP requirements for	The glass used in solar panels is tempered or tapered, so when the front side of a panel is damaged and the glass breaks, the glue applied to the inside glass face keeps the broken pieces in place until the panel is repaired or replaced. As such, there is very little risk of broken glass contaminating the development site.

Issue	No. responses	Details of issue	Response
		accreditation. Any infrastructure left (like broken glass) will cause contamination.	
Theft on surrounding properties during construction	1	Increasing the number of people in the area during construction would increase the risk of theft from neighbouring properties.	<p>FRV will ensure that adequate security is in place across the development site to protect their valuable asset. In many cases this means that the area is more secure than before due to staff on the ground and security cameras.</p> <p>The very small risk of a temporary increase in antisocial behaviour such as theft during construction should be weighed against the socio-economic benefits of the proposal including employment opportunities for local residents, bringing workers to the area who would spend money at local businesses in Walla Walla and Culcairn, and the ongoing operational of approximately \$10 million per annum.</p>
Reduced efficiency in winter due to fog	1	The development site experiences regular fog events in winter that block sunlight and would prevent electricity generation.	<p>FRV has completed a feasibility analysis for the proposal including local climate research. The proponent is confident that energy generation from solar panels would not be impeded by seasonal fog events.</p>
Screening will take too long to be effective	16	The proposed vegetative screening will take many years to have any effect on the visual impact, as the plants will be seedlings.	<p>Plant species were selected on the advice of a local grower of indigenous species, and selection was also vetted by the BDAR and existing plant community types on-site.</p> <p>FRV contacted near neighbours R1, R2 and R5 on 14 February 2020 about planting fast growing screening vegetation over 2020 to increase the effectiveness of screening during construction. All three near neighbours approached requested that planting not be undertaken prior to development consent determination.</p> <p>Overstorey vegetation is likely to take some years to mature as an effective vegetative screen, but the chosen species within the midstorey and shrubs are fast growing and dispersive/spreading species capable of fast establishment and screening. However, it is also likely that the overstorey vegetation will have established enough as an effective vegetative screen by this time. It is noted that the aim of plant screens is to break up the view and not eliminate it entirely. Partial views will occur, particularly while vegetation is developing to maturity.</p>

Issue	No. responses	Details of issue	Response
Use of a significant amount of water during construction & operation	5	There is currently a national and regional water shortage. Using large volumes of water for a solar farm is not a good use of this valuable resource.	The proponent has explored the possibility of using low quality water from the Hurricane Hill Quarry for construction water (e.g. dust suppression), however, Boral Resources have confirmed that the availability of this water is unreliable. A reliable source of water is available via the RWCC pipeline that intersects the development site. FRV would continue to explore measures to reduce potable water consumption leading up to and during construction. FRV have consulted RWCC who have confirmed that there is ample water available both for potable water and dust suppression (refer Appendix D.1).

4.1.2. Organisation submissions

Three organisation submissions were received including one objection, one neutral and one letter of support. These submissions have been paraphrased and are addressed below.

APA Group (Neutral)

Issue	Response
<p>APA Group (APA) is Australia’s largest natural gas infrastructure business and has direct management and operational control over its assets and investments.</p> <p>APA owns and operates one pipeline located within easement on subject Lot 1 on DP 1069452 being for APA’s Barnawartha -Culcairn pipeline.</p> <p>APA wishes to review the previous (safety management study) SMS for this location and development and ensure appropriate risk mitigation measures are in place. APA requires the applicant to attend the SMS review (to be carried out internally by APA, to ensure they understand the risks associated with the gas pipeline and any development in its vicinity. The development proponent should address the issues raised in this letter prior to any approval being granted. APA acceptance of the proposed development is subject to the following conditions.</p>	<p>Noted. Prior to construction FRV would develop a Gas Pipeline Management Plan in consultation with APA Group to satisfy the comments in their submission in response to the EIS as indicated below.</p> <p>Following receipt of APA’s submission on the proposal, FRV contacted APA by telephone on 4 February 2020 to discuss APA’s expectations in detail. On the 14 of February APA provided an updated submission. FRV is satisfied that APA’s requirements have been adequately met in changes to the layout design (Figure 2-3) and the updated Landscape design Appendix B.</p>
<p><u>No Improvements within easement</u></p> <p>Buildings, structures, roadway, pavement, pipeline, cable, fence, on-site wastewater treatment (or irrigation area), or any other improvement on or under the land within the gas transmission pipeline easement must not be constructed without prior consent in writing from APA. No structure or vegetation will be permitted on the easement that prohibits maintenance of line of sight along the pipeline easement.</p>	<p>APA’s gas pipeline has been identified and avoided in the proposed infrastructure design layout shown in Figure 1.3 of the EIS.</p> <p>The following has been added to the safeguards and mitigation measures for Land Use:</p> <ul style="list-style-type: none"> • <i>No infrastructure including buildings, roads pavement, pipeline cable, fence wastewater treatment plant (or irrigation area) will be constructed within the gas pipeline easement without the written consent from APA.</i> • <i>No vegetation or structure prohibiting pipeline maintenance would be permitted within the gas pipeline easement.</i>
<p><u>Access</u></p> <p>Access to the easement and access along the easement must be available to APA personnel at all times.</p>	<p>FRV have consulted APA and have taken recommendations on board including new access points, which will also provide additional emergency access points for firefighters. No structures or</p>

Issue	Response
	<p>screening vegetation will occur within the gas pipeline easement (refer Figure 2-3).</p> <p>The following has been added to the safeguards and mitigation measures for Land Use:</p> <ul style="list-style-type: none"> • <i>APA and Riverina Water would always be provided access to their infrastructure and associated easements within the development site.</i>
<p><u>Safety management study required</u></p> <p>Prior to the development commencing, a Safety Management Study, in accordance with Australian Standards 2885 for Pipelines – Gas and Liquid Petroleum, must be conducted.</p>	<p>The following has been added to the safeguards and mitigation measures for Hazards (section 7.4.6 of the EIS):</p> <ul style="list-style-type: none"> • <i>A safety management study, in accordance with Australian Standards 2885 for Pipelines – Gas and Liquid Petroleum, would be completed prior to construction commencing.</i>
<p><u>Risk assessment required</u></p> <p>Prior to the development commencing, and to inform detailed design, the applicant must conduct electrical hazard studies in accordance with (the requirements of) Australian Standard 4853-2012 (for Low Frequency Induction and Earth Potential Rise). The applicant must address any relevant requirements and any recommendations and/or actions must be implemented to the satisfaction of APA. All costs associated with the study and implementing its recommendations and/or actions are to be borne by the applicant. The applicant must complete validation testing upon completion of construction.</p>	<p>The following has been added to the safeguards and mitigation measures for Hazards:</p> <ul style="list-style-type: none"> • <i>The proponent would complete an electrical hazard study in accordance with AS 4853-2012 prior to construction addressing low frequency induction and earth potential rise. Any relevant requirements, recommendations and/or actions would be implemented to the satisfaction of APA.</i>
<p><u>Electrical interference studies</u></p> <p>The applicant must conduct electrical interference studies in accordance with the requirements of AS2832 once detailed design is complete.</p>	<p>The following has been added to the safeguards and mitigation measures for Hazards:</p> <ul style="list-style-type: none"> • <i>An electrical interference study would be completed once the detailed design is complete in accordance with the requirements of AS 2832.</i>
<p><u>Amend design to comply with Australian Standards</u></p> <p>The applicant must amend its design as required in order to obtain results for the electrical interference studies and electrical hazard studies which comply with the applicable Australian Standard and promptly provide a copy of the studies and reports to APA.</p>	<p>Appropriate additional safeguards have been added to section 0 of this RTS.</p>

Issue	Response
<p><u>High voltage powerlines</u></p> <p>The applicant must make good (at the applicant's cost) any hazards or risks to the Barnawartha - Culcairn pipeline (including cathodic protection systems), caused by any powerlines.</p>	<p>The following has been added to the safeguards and mitigation measures for Land Use:</p> <ul style="list-style-type: none"> <i>The proponent must make good (at the applicant's cost) any hazards or risks to the Barnawartha-Culcairn pipeline (including cathodic protection systems), caused by powerlines.</i>
<p><u>Landscape plans</u></p> <p>Prior to the development commencing, landscape plans depicting any planned landscaping, including the planting of vegetation, species details, surface treatments, furniture, structures or improvements within three metres of the pipeline must be submitted to and approved by APA, in addition to any approval required by the assessment manager. A three metre minimum clearance between the pipeline and any vegetation with a mature height greater than 0.5 metres must be maintained.</p>	<p>The following has been added to the safeguards and mitigation measures for Land Use:</p> <ul style="list-style-type: none"> <i>Screening vegetation would maintain clearance zones for the gas pipeline and water pipeline easements of 3 m and 5 m respectively including overhanging vegetation.</i>
<p><u>Construction Management Plan</u></p> <p>Prior to the commencement of any works, including demolition, on land within 50 metres of the pipeline easement, a construction management plan must be submitted to and approved by APA. The plan must:</p> <ul style="list-style-type: none"> Prohibit the use of rippers or horizontal directional drills unless otherwise agreed by the operator of the gas transmission pipeline. Avoid significant vibration, heavy loadings stored over the pipeline and heavy vehicle / plant crossings of the pipeline within the easement. Be endorsed by the operator of the gas transmission pipeline where the works are within or crossing the relevant gas transmission easement. 	<p>The following has been added to the safeguards and mitigation measures for Land Use:</p> <ul style="list-style-type: none"> <i>A Construction Environmental Management Plan would be developed in consultation with APA and provide to them for input and endorsement prior to the commencement of construction.</i> <p>FRV believes this commitment is sufficient for APA to be satisfied that their specific requirements are adequately addressed.</p>
<p><u>Services</u></p> <p>The design of any infrastructure services shall minimise encroachment on the gas pipeline easement. Any application for an APA permit for an easement crossing will be required to demonstrate that an alternative route, avoiding the easement, is not feasible.</p>	<p>The following has been added to the safeguards and mitigation measures for Land Use:</p> <ul style="list-style-type: none"> <i>The design of any infrastructure services shall minimise encroachment on the gas pipeline easement. Any application for an APA permit for an easement crossing would be required to demonstrate that an</i>

Issue	Response
	<i>alternative route, avoiding the easement, is not feasible.</i>
<p><u>Easement delineation onsite</u></p> <p>During construction, the boundary of the easement must be clearly delineated on site by temporary fencing (or other means as agreed by APA), and clearly marked as a hazardous work zone/ restricted area.</p>	<p>The following has been added to the safeguards and mitigation measures for Hazards:</p> <ul style="list-style-type: none"> <i>During construction, the boundary of the gas pipeline easement would be clearly delineated by temporary fencing (or other means as agreed by APA), and clearly marked as a hazardous work zone/ restricted area.</i>
<p><u>Easement delineation on plans</u></p> <p>All plans which include the area of the gas pipeline easement must have the easement clearly identified with hatching on the full width of the easement. The easement must also be clearly labelled as ‘high pressure gas pipeline easement – no works to occur without the prior authorisation of the pipeline operator’.</p>	<p>FRV has update the layout plan (Figure 2-3) to clearly identify the gas pipeline easement with hatching. The updated layout has also clearly labelled the easement as ‘high pressure gas pipeline easement – no works to occur without the prior authorisation of the pipeline operator.’</p> <p>All future plans including the detailed design for construction would comply with APA’s request.</p>
<p><u>Pipeline operator access</u></p> <p>The ability of the pipeline operator to access the easement must be maintained at all times to facilitate prompt maintenance and repairs. This may be through interlocking padlocks, so APA has keyed access as any time. APA field officers will undertake any necessary site induction to facilitate unaccompanied access.</p>	<p>The following has been added to the safeguards and mitigation measures for Land Use:</p> <ul style="list-style-type: none"> <i>The gas pipeline operator would be provided access of the easement at all times to facilitate prompt maintenance and repairs. Site access would be through interlocking padlocks, so APA has keyed access as any time. APA field officers must undertake any necessary site induction to facilitate unaccompanied access.</i>
<p>APA does not seek to unnecessarily inhibit future development proximate to our assets and is happy to work with development proponents to achieve mutually acceptable and compliant outcomes. Any interested parties are strongly encouraged to contact APA early to discuss the process of integrating APA assets into future developments.</p>	<p>Noted.</p>

Gerogery Horse Sports (Supports)

Issue	Response
<p>The Gerogery Horse Sports Assoc is located approximately 5 minutes from the proposed Walla</p>	<p>Noted. FRV thanks Gerogery Horse Sports for their support.</p>

Issue	Response
<p>Walla solar farm. We would like to formally throw our support behind the project and encourage approval of same.</p> <p>Many of our members come from rural backgrounds and we understand the importance of social sporting days that bring community together –particularly poignant now as the ever-widening drought impacts the mental health of rural communities.</p> <p>Gerogery Horse Sports provides a safe and family friendly environment and as a result many families visit our region.</p> <p>Projects like the Walla Solar with their forecasted support of a variety of community initiatives also will bring new people to our doorstep and no doubt new families to our club. Organisations like ours do not survive without support and community spirit and we believe the solar farm will bring both.</p> <p>The landowners have been great supporters of our club and have a long history of supporting any good cause and I am certain a successful application will only increase their capacity to do so.</p>	

NSW Farmers Billabong Branch (Objects)

Issue	Response
<p>NSW Farmers members have raised significant concerns about large scale solar developments covering extremely large areas of productive farmland in the Billabong Branch area of Greater Hume Shire.</p>	<p>FRV have addressed the likely impacts of the proposal on the accessibility to arable agricultural and in the region in sections 6.3.1 and 7.6 of the EIS. The EIS particularly highlighted the following reasons why the proposal would not significantly impact agriculture production in the region:</p> <ul style="list-style-type: none"> • The development site would be returned to agricultural land use on decommissioning. Only the 3.2 ha substation area of the 605 ha development site would be permanently lost to agriculture as this would remain the freehold property of TransGrid. • Sheep grazing would continue within the development site over the life of the proposal at an estimated 85% capacity compared to pre-construction conditions, thus the development site does not depart from agricultural land use.

Issue	Response
<p>A view has been formed that the loss of production caused by large scale developments cumulatively with the impact of severe drought in NSW and Murray Darling Basin issues may cause further negative impacts to food production in our state. Farmers are suffering in other areas of NSW through increased costs and lack of availability of fodder and grain.</p>	<ul style="list-style-type: none"> Approximately 4,359 km² (~435,900 ha) is used for agriculture within the Greater Hume LGA. The temporary diversion of 1,935 ha (~0.24%) of agricultural land within the Greater Hume Shire would result in a negligible decrease in the overall productivity of the region <p>Bison Energy had meetings with the NSW Farmers' Association South Region Manager at the Information Session No. 1 and the one-on-one meeting held at the NGH Offices in Wagga Wagga on 23 May 2019. Following this FRV had meetings with NSW Farmers Association on 02 August 2019 and 24 September 2019.</p> <p>Numerous members had raised concern with the NSW Farmers' Association about the location of solar farm developments on productive agricultural land. The lack of detail on available State land capability mapping data does not currently provide sufficiently accurate and precise information for project scoping and constraints analysis.</p> <p>FRV have appreciated the feedback and communication received from NSW Farmers Association, which has helped shape the changes within the design of the proposal.</p> <p>10 letters of support from individual members of the public including the landholders were made on the basis that the proposal will increase the productivity of the two farms, leasing part of their land for the proposal. The reason for this is because the land leased for the proposal, while not suitable for regular cropping, would offset the input costs including lime and gypsum to improve the productivity of other parts of these farms. A good portion of the development site is currently leased to two cropping agri-businesses, who would benefit indirectly from the proposal, by being provided for more productive land than they lease currently.</p>
<p>Earlier this year, this branch made representation to NSW Department of Primary Industries advocating the importance of completing the Riverina Murray Important Agricultural Land Mapping (IAL) project. This continues to remain outstanding for determination. It is understood that the NSW Draft Solar Guidelines for State Significant Development references Important Agricultural</p>	<p>The EIS was prepared according to the NSW Draft Solar Guidelines for State Significant Development as guidance provided by the consent authority. As the Draft Solar Guidelines for Significant State Development references Important Agricultural Land and Land with Soil Capability (LSC) Classes 1, 2 & 3 as being areas of constraint for development, this was addressed in the EIS.</p>

Issue	Response
<p>Land and Land with Soil Capability (LSC) Classes 1, 2 & 3 as being areas of constraint for development.</p> <p>Significant concern was raised during the Draft IAL consultation period regarding outdated and incorrect soil data and therefore our branch strongly cautions the NSW Government against the use of the Land and Soil Capability Assessment Scheme with the SEARS referring to this land as class 4 and 6 land under that scheme.</p>	<p>FRV have calculated the reality of the land which will be utilised for the solar farm, only 14.9% of the subject land will be 'absorbed'. This small percentage can also be returned to farming land after the project ceases operations.</p>
<p>Under the category Descriptions and the Land Management Considerations noted within the Second Approximation of the Land and Soil Capability Assessment Scheme, much of the land in this area and, most importantly, the lands suggested for these developments, appears incorrect due to strong cropping capacity.</p>	<p>Over the past decade, the subject land has been used largely for cattle and sheep grazing with some intermittent cropping. This recent land use is consistent with the characterisation of Class 4 land under the Land and Soil Capability Assessment Scheme, as 'capable of sustaining cultivation on a rotational basis.' Letters from the two landholders were provided to DPIE in February 2020 and are summarised in Appendix D.6.</p>
<p>Our branch strongly recommends that prior to the determination of any large scale development in our area that the Department of Primary Industries should determine the Riverina Murray Important Agricultural Land Mapping project using the appropriate measures outlined in their guidelines, including stakeholder engagement from local industry professionals. This will ensure that reliable cropping land is retained to ensure continued food production into the future.</p>	<p>As described above only, 0.24% of agricultural land within the Greater Hume Shire would be impacted cumulatively if all four proposed SSD solar farm proposals proceeded to construction. Of this Walla Walla would remove only ~0.078% of arable agricultural land, whether or not the development site is cropped, for the 30 year life of the proposal.</p>
<p>Our members hold the opinion that productive and consistent food and fodder sources in this area should be protected due to favourable climatic conditions, reliable rainfall, ability to produce and the strong support of outstanding services to agriculture and location to freight.</p>	<p>While FRV is aware of concern about temporarily removing 495 ha of land crop production for the 30 year life of the project, the proponent considers:</p> <ul style="list-style-type: none"> • The currently landowners do not currently crop the entire development site in any year on a regular basis. • Revenue raised from leasing the development site would enable landholders to increase the production capacity of the remainder of their farms retained solely for agricultural land use. • Any lost benefits from likely crop yields should be weighed against other socio-economic benefits to the region (e.g. 21 FTE employees for the life of the project).

Issue	Response
<p>It is understood that these developments are permissible under the Infrastructure SEPP however your attention is drawn to the State Environmental Planning Policy (Primary Production and Rural Development) 2019 that includes the following aims:</p> <ol style="list-style-type: none"> a. <i>to facilitate the orderly economic use and development of lands for primary production.</i> b. <i>to reduce land use conflict and sterilisation of rural land by balancing primary production, residential development and the protection of native vegetation, biodiversity and water resources.</i> c. <i>to identify State significant agricultural land for the purpose of ensuring the ongoing viability of agriculture on that land, having regard to social, economic and environmental considerations.</i> d. <i>to simplify the regulatory process for smaller-scale low risk artificial waterbodies, and routine maintenance of artificial water supply or drainage, in irrigation areas and districts, and for routine and emergency work in irrigation areas and districts.</i> e. <i>to encourage sustainable agriculture, including sustainable aquaculture.</i> f. <i>to require consideration of the effects of all proposed development in the State on oyster aquaculture.</i> g. <i>to identify aquaculture that is to be treated as designated development using a well-defined and concise development assessment regime based on environment risks associated with site and operational factors.</i> 	<p>FRV considers that the proposal is consistent with the these aims of the State Environmental Planning Policy (Primary Production and Rural Development) 2019 for the following reasons:</p> <ul style="list-style-type: none"> • Agricultural primary production would continue within the development site in the form of sheep grazing at an estimated stocking capacity of 85% of pre-clearing production. • Agricultural areas surrounding the proposal would not be sterilised or disadvantaged in any way, and the proposal would balance primary production and electricity production with the protection of biodiversity and water resources. • The proposal will improve soil health (e.g. increased carbon and microbiota content) within the development site, which would be available for future agriculture production following decommissioning.
<p>The Riverina Murray Regional Plan strongly boasts of our regions agricultural wealth and recognises the multiplying benefits of the agricultural supply chain. This local area will again this year, in this significant period of drought and minimal water allocation to irrigators, provide a huge amount of fodder and grain supporting those in need in our state.</p>	<p>FRV considers that the temporary removal of 0.078% of arable agricultural land from cropping should be weighed against the social-economic benefits of the proposal:</p> <ul style="list-style-type: none"> • Strategic goals of the Commonwealth and NSW Governments for renewable energy development going forward. • The environmental benefits of solar energy production, in particular the reduction of greenhouse gas emissions.

Issue	Response
<p>Our branch wonders why the economic analysis for this project is listed as confidential? We would like to query whether benefits to the economy will adequately cover the loss of agricultural production and expenditure and the multiplying economic effect through the supply chain, from the manufacturing of agricultural machines and products through to the purchase of food products by the end consumer, associated employment and other benefits.</p>	<ul style="list-style-type: none"> • The economic benefits of using an area with reliable solar resources and access to existing electricity infrastructure. • The benefits of alternative and increased energy supply for grid stability and reliability. <p>Capital Value Investment (CIV) reports are a requirements of the SEARs for SSD developments and are provided to DPIE as a confidential report because they contain commercially sensitive information.</p>
<p>The "Do Nothing Approach" in the EIS document is not a valid argument. The opportunity of appropriately placing these developments in less arable areas would have the advantage of achieving both an economic benefit whilst also retaining the food production capacity.</p>	<p>The proponent believes that the justification for the proposal is adequately covered in sections 2 and 9 of the EIS. Sections 6 and 7 of the EIS also described the likely impacts from the proposal and whether these can be effectively managed and or mitigated. Electricity generating facilities and auxiliary infrastructure need to be located within hundreds of kilometres of populations centres because as electricity flows through the transmission lines, energy is lost due to electrical resistance the heating of conductors. Unfortunately, population centres also tend to be surrounded by arable agricultural land. Generally speaking, it would not be financially viable for electricity network providers and electricity generators to invest in the development of electricity generation facilities in arid, sparsely populated areas because too much electricity would be lost in transmission by the time it enters population centres.</p>
<p>It is noted that Renewable Energy Action Plan - Goal 2 is to "Build community support for renewable energy." Unfortunately, in order to gain community acceptance, developers in our area appear to have taken a marketing approach to offer community funds to towns rather than to use funds towards the mitigation of impacts to affected neighbours, which has seen a fracture of communities and works against this goal. In addition, the conflict between landowners undertaking developments and neighbours is immense.</p>	<p>The proponent cannot answer for the community and stakeholder engagement for other proposed solar farm developments, however, FRV has genuinely endeavoured to engage thoroughly with the community as detailed in the CSER and address people's concerns as far as practicable.</p> <p>In both its submissions to SEARs and EIS, Council has asked FRV for a percentage of the capital investment value for project as a financial contribution to Council. FRV have agreed to enter into a VPA with Council.</p>

Issue	Response
<p>NSW Farmers strongly advocates the <i>NSW Right to Farm Policy</i> designed to ensure a cohesive approach to agricultural planning to avoid conflict or interference to agricultural practice. The Principle of the <i>NSW Right to Farm Policy</i> states that the NSW Government recognises the value of agriculture for growing food and fibre for domestic and international markets and is concerned about potential loss or impaired use of agricultural land. Agriculture is important to local, regional, and state economies and communities. This document acknowledges that "Only 11% of NSW is used for higher productivity agricultural uses such as cropping (dryland 9.6%, irrigated 1.3%) and horticulture (0.2%)".</p>	<p>The NSW Right to Farm Policy, refers to factors beyond a farmer's control, such as access to irrigation water, that have the ability to influence the production capacity of their land, not only to leading lower commodity yields, but also financial hardship for farmers that threaten their businesses and livelihoods.</p> <p>In the case of the proposal, two landholders have chosen willingly and for commercial reasons to lease part of their farming land to the proponent. This decision would likely strengthen the agribusinesses of these landholders enabling their farms to produce yields for many years and survive even the toughest seasons.</p>
<p>Our branch of NSW Farmers acknowledges that primary producers are on the front line of seasonal variability exacerbated by a changing climate. Of the impacts that may be brought about by climate change, food production could be hit hardest. With this in view, Billabong Branch strongly believes that the best net benefit should be achieved through placing these developments in communities with arid or poorly producing land and targeted renewable energy zones with these features. Infrastructure to allow development in these areas such as transmission lines must become a serious priority of the NSW Government to allow this to occur.</p>	<p>As above. Indeed, many farms struggle through seasonable variability exacerbated by climate change. FRV believes the proposal will boost the local community during times of hardship and provide a secondary, non-rainfall dependent source of income for local agribusinesses.</p>
<p>NSW Farmers solar policy promotes that there should be clear guidelines and regulation for the development, operations and decommissioning of Solar Farm Energy Generation which avoids negative impacts on current and future neighbouring landholders. Some issues include increased heat, bushfire hazard, weeds, insurance, drainage, dust, noise and livestock impact to name a few. At this point our members are clearly concerned by the lack of evidence in relation to the impacts of large scale solar. Proven research needs to be conducted by the developers before further development s proceed around prime agriculture based on the massive scale of these developments in similar environmental conditions.</p>	<p>FRV believes that potential impacts on neighbouring farms was adequately addressed in the EIS and is confident that the production capacity of concerned landholders would not be adversely impacted.</p>
<p>Proven mitigation measures need to be undertaken at the responsibility of developers to overcome all</p>	<p>FRV believes that potential environmental impacts have been adequately addressed in sections 6 and</p>

Issue	Response
<p>impacts. We are concerned that extremely large developments in more productive areas will bring additional impacts which may have previously been unseen.</p>	<p>7 of the EIS. Future potential impacts would be further addressed in post-approval environmental management plans developed in compliance with conditions of consent.</p>
<p>In order to ensure impacts are not endured by our members we believe that a responsibility of NSW Planning is to ensure that independent ground truthing of data occurs and that a primary consideration contained within the EIS is proven, true mitigation measures or appropriate compensation to address impacts to the production and livelihood of neighbours with agricultural interest. There is concern that due to the financial return achieved by environmental companies in completing EIS documents that wording may be intended to be construed in developers' favour.</p>	<p>Noted. NGH is an Australian consultancy that prides itself on being ethical and demonstrating integrity during the preparation of environmental impact assessments. The NGH primary author of provides the following signed certification:</p> <p><i>I certify that I have prepared the contents of this Environmental Impact Statement in accordance with Schedule 2 of the Environmental Planning and Assessment Regulations 2000. To the best of my knowledge, this assessment contains all available information that is relevant to the environmental assessment of the project and that information is neither false nor misleading.</i></p>
<p>There is concern that the wording in the EIS document in relation to the retention of agriculture and sheep production may be ambiguous for marketing reasons and not reflect the true intention or capacity of sheep production on these properties after development. There would be few producers that could undertake sheep production without hay or grain and when this is removed from production where will these products be sourced. Without the cropping potential of the land, the ability to make hay or fodder, or grow dual purpose crops, the ability to continue sheep production to a capacity close to that prior to the development would appear incorrect.</p>	<p>The development site represents only part of the farmland owned by the landholders and sheep would likely be moved off the development site periodically to allow groundcover to recover. Alternatively, supplementary feed would be acquired from their own crops grown elsewhere on their farms.</p> <p>Existing pasture species would be maintained beneath the solar panels and the proponent believes that resting this land from cropping would improve the soil's health over time resulting in increased moisture retention and eventually, when returned to cropping, temporarily higher yields.</p>

4.1.3. Agency submissions

Agency submissions have been paraphrased and are addressed below. The Amendment Report includes subsequent alternations to the EIS and BDAR including additions and deletions to safeguards and mitigation measures.

Crown Lands, Newcastle NSW

Issue	Response
<p>There is a Crown Public road located between Lot 108 & Lot 109 DP 753735 and Lot 78 DP 753735, that has an Enclosure Permit to the adjoining land holder.</p>	<p>The Crown Public Road between Lots 89 and 109 DP 753735 and Lot 78 DP 753735 lies outside the development site and would not be impacted by the proposal. This Crown Public Road is currently</p>

<p>Should the road be required for access to the proposal area, the road should either be closed and purchased by the proponent or transferred to Council. Consultation should also occur with the adjoining landholder if the enclosure permit is impacted.</p>	<p>maintained by the adjoining landholder and has been revegetated with native vegetation.</p>
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Department of Primary Industries (DPI)

Issue	Response
<p>The Department of Primary Industries has reviewed the EIS for this project and has no comment.</p>	<p>Noted.</p>

Biodiversity and Conservation Division (BCD), DPIE

Issue	Response
<p>While the assessment and offsetting for clearing of paddock trees is allowable, BCD is concerned about the large number of mature habitat trees being removed from the landscape. The considerable benefits of paddock trees to biodiversity and threatened species, particularly hollow-dependent fauna, are well documented</p>	<p>FRV recognises the value of mature hollow-bearing paddock trees for supporting biodiversity and providing habitat for threatened species and does not want to understate the importance of retaining trees, particularly in the light of recent fire events across NSW.</p> <p>Since acquiring the proposal in July 2019, FRV has reduced the number of paddock trees that would be removed and has considered other ways to compensate their loss (in addition to retiring biodiversity credits through the NSW Biodiversity Offset Scheme. One immediate management action that can be undertaken would be to improve the connectivity food availability of the vegetation surrounding Back Creek to provide better habitat for Threatened Squirrel Gliders (<i>Petaurus norfolcensis</i>) that were recorded along the creekline during nocturnal surveys. Squirrel Gliders require dense vegetation and cannot currently utilise the majority of paddock trees within the development site. Two other Threatened species were recorded at the development site including the Flame Robin (<i>Petroica phoenicea</i>) & Brown Tree Creeper (<i>Climacteris picumnus</i>). Neither of these species utilise tree hollows and would likely benefit from the expansion of native shrub cover and increased insect activity that would result from the proposed vegetation screening and enhancement of Back Creek.</p> <p>FRV are aware that multiple bird and mammal species are dependent on tree hollows and has committed to installing approximately 120 nest boxes across the development site. By the end of the 30 year project life,</p>

Issue	Response
	FRV anticipates that planted vegetation would be advanced enough to offer many of the habitat benefits provided by larger trees including tall branches to support stick nests.
<p>Historic heritage information contained within the ACHAR (section 3.2.3) is not relevant to ACH.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> • Remove sections relating to historic heritage from the ACHAR. 	The ACHAR has been updated to remove historical heritage information and is provided in Appendix F of this RTS.
<p>An up-to-date unexpected finds protocol for Aboriginal cultural heritage, including skeletal remains, must be developed and implemented before construction begins.</p> <p>An appropriate unexpected finds protocol is developed prior to the commencement of construction, and to the satisfaction of the Department, that includes the following:</p> <p>If any Aboriginal object is discovered and/or harmed in, or under the land, while undertaking the proposed development activities, the proponent must:</p> <ol style="list-style-type: none"> 1. Not further harm the object. 2. Immediately cease all work at the particular location. 3. Secure the area to avoid further harm to the Aboriginal object. 4. Notify Department of Planning, Industry and Environment as soon as practical on 131555, providing any details of the Aboriginal object and its location. 5. Not recommence any work at the particular location unless authorised in writing by Department of Planning, Industry and Environment. <p>If skeletal remains are unexpectedly encountered during the activity, work must stop immediately, the area secured to prevent unauthorised access and contact made with NSW Police and Department of Planning, Industry and Environment.</p>	FRV commits to developing and implementing an up-to-date unexpected finds protocol.
<p>Proposed minimum 10 m buffer around the two scarred trees (Walla Solar Farm 495496 and Walla Solar Farm 497946) and the three cultural tree sites (Walla Solar Farm 496602, Walla Solar</p>	FRV commits to installing a physical barrier to demarcate a 10 m 'no go' buffer around the two scarred trees.

Issue	Response
<p>Farm 496812 and Walla Solar Farm 497199) may be inadequate.</p> <p>Recommended actions:</p> <ul style="list-style-type: none"> A physical barrier (visible protective fencing) should be installed as a buffer relevant to, and outside, the canopy dripline of each identified tree. 	<p>The following mitigation measure for Aboriginal Heritage:</p> <ul style="list-style-type: none"> The development must avoid the two possible Scarred Trees (Walla Solar Farm 495495 and Walla Solar Farm 497946). A minimum 10 m buffer around each tree should be in place to protect the trees canopy and root system. <p>Has been replaced with:</p> <ul style="list-style-type: none"> <i>The development must avoid the two possible Scarred Trees (Walla Solar Farm 495495 and Walla Solar Farm 497946). A minimum 10 m buffer, marked which a physical barrier such as fencing, around each tree should be in place to protect the trees canopy and root system.</i>
<p>The Site Flood Assessment Report concludes that the development is compatible with the flood risks and that it is not expected to cause adverse impacts to surrounding properties with appropriate design. BCD agree with this conclusion if design flood extents and heights are refined, and infrastructure is designed and located commensurate with newly defined flood risks.</p> <p>The detailed design phase for flooding includes a more detailed 2D flood model developed with the use of a higher resolution Digital Elevation Model to refine the design flood heights and extents for use in the appropriate design and location of infrastructure on the site.</p>	<p>FRV would complete detailed 2D flood modelling during the pre-construction detailed design phase prior to construction. A Digital Elevation Model would refine the design flood heights and extents for use in the appropriate design and location of infrastructure on the site.</p>
<p>The Biodiversity Development Assessment Report (BDAR) (Appendix H) does not meet the SEARs. Elements of the proposal described in the EIS that potentially impact biodiversity have not been included in the assessment. The assessment must consider all zones and PCTs on the development site, as per section 6 of the BAM. PCT 278 ‘Riparian Blakely’s Red Gum’ was not sampled during the floristic survey. There is no vegetation integrity score and it has not been entered in the BAM-C. This under-represents the habitat suitability, credit obligations of habitat loss in subsequent parts of the BAM. Section 7.1.1 (page 83) introduces ‘partial clearing’ as the impact to Zone 4, consisting of 23 ha of grassland derived from PCT 76 Grey Box Woodland that has no evidence of past</p>	<p>The BDAR has been modified to incorporate BCD’s comments on biodiversity, except for where indicated in this section of the RTS.</p>

Issue	Response
<p>cropping. BCD strongly disagrees with the future integrity score for Zone 4. Insufficient evidence has been provided to justify the assertion that construction and operation of the solar farm has a lower impact on derived native grassland than other vegetation types, or to justify the degree of impact presented in the BDAR. The BDAR, including assessment of serious and irreversible impacts to candidate entities, should be revised following inclusion of PCT 278 and revision of impacts to Zone 4.</p> <p>Recommended actions:</p>	
<ul style="list-style-type: none"> • Provide a complete map of elements of the proposal as described in the EIS, including water tanks, materials lay-down areas, screening plantings and asset protection zones associated with the security fence, and confirm that they have been included in the assessment. 	<p>See Figure 4-3 below. Temporary laydown areas would be located on exotic vegetation within the development footprint, while permanent/long term laydown areas would be located within the O&M compound.</p>
<ul style="list-style-type: none"> • Supply all digital data required by the BAM, including a digital version of the development footprint as shown on Figure 6-1 (page 79) with a 10 m asset protection zone outside the security fence. 	<p>Requested digital data have been supplied with this RTS.</p>
<ul style="list-style-type: none"> • Assess impacts to PCT 278 ‘Riparian Blakely’s Red Gum’ (Vegetation Zone 10) according to the BAM. The threatened species listings and wider assessment in the BDAR should reflect the output of the updated assessment. 	<p>Advice received from BAM Support conflicts with BCD’s request under section 6 of the BAM, stating that only those vegetation zones that are being impacted should be used to generate the offset obligation. This correspondence from BAM Support is provided in Appendix D.3.</p>
<ul style="list-style-type: none"> • Complete plot sampling for the development site. Based on the area of each PCT in the development site provided in Table 3-5 (page 41), three more plots in Zone 9 and two in Zone 10 to achieve BAM compliance. 	<p>Additional vegetation integrity plots were carried out for Zones 9 and 10 and this data was used to generate a vegetation integrity score for these zones. Offset obligations have not been generated for Zone 10 in accordance with BAM Support advice.</p> <p>Indirect impacts on vegetation in Zone 9 and Zone 10 such as dust, noise, vibrations, etc. have been addressed in section 6 of the revised BDAR (Appendix D.3).</p>
<ul style="list-style-type: none"> • Include the impacts of proposed screening planting along the eastern site 	<p>See section 6 of the revised BDAR (Appendix A).</p>

Issue	Response
<p>boundary in the assessment and its location in the development footprint.</p>	
<ul style="list-style-type: none"> • Ensure that potential impacts to native vegetation due to revegetation and rehabilitation works are identified and addressed in the BDAR. 	<p>See section 6 of the revised BDAR (Appendix A).</p>
<ul style="list-style-type: none"> • Revise the BAM calculator and BDAR to ensure that the assessment of biodiversity impacts and offset obligation include all zones on the development site, as per Section 6 of the BAM. Adjustment to the BAM calculator is to be completed before impacts are identified and assessed according to BAM Sections 7 to 11. The offset requirement is likely to be an underestimate as a result of the missing Zone 10. 	<p>The BAM Calculator and BDAR have been revised to ensure that the assessment of biodiversity impacts and offset obligation includes all zones that would be impacted by the proposal, in accordance with advice provide by BAM Support.</p> <p>Direct impacts are taken to be consistent with “clearing” native vegetation as defined in Part 5A, section 60C, of the <i>Local Land Services Act 2013</i> (NSW).’</p>
<ul style="list-style-type: none"> • Undertake threatened fauna survey in Zone 10 (PCT 278) and revise the credit calculator accordingly. 	<p>Zone 10 would not be directly impacted by the proposal.</p>
<ul style="list-style-type: none"> • Justify why nocturnal bird surveys were performed over two nights, instead of five separate nights as recommended in the Threatened Biodiversity Survey and Assessment Guideline (DEC 2004). 	<p>The ‘5 night’ recommendation in the Threatened Biodiversity Survey and Assessment Guideline refers specifically to the call playback survey method for nocturnal birds. Nocturnal surveys undertaken, however, were accompanied with thorough spotlighting transects that covered all areas across the development site where nocturnal birds were likely to occur.</p> <p>The Threatened Biodiversity Survey and Assessment Guideline states that “<i>several studies have found owls are most likely to be detected by call playback techniques combined with spotlighting.</i>”</p> <p>No minimum number of visits is specified for the spotlighting transect sampling method for nocturnal birds.</p>
<ul style="list-style-type: none"> • Revise the future vegetation integrity score for Zone 4 to 0 and recalculate the credit requirement. Insufficient evidence is provided to justify the assertion that construction and operation of the solar farm has a lower impact on derived native grassland than other vegetation 	<p>While impacts will occur to the groundcover vegetation within Zone 4, groundcover will be retained and enhanced through the operation of the proposal, as discussed in Section 7.1.1 of the BDAR. The future vegetation integrity score entered in the BAM-C assumed a 10% reduction in vegetation integrity, and it is acknowledged that further analysis and justification</p>

Issue	Response
<p>types, or to justify the degree of impact presented in the BDAR.</p>	<p>of this percent reduction is required. This analysis and justification are provided within the updated BDAR, and an updated future vegetation integrity score has been calculated within the BAM-C.</p> <p>A reduction of the vegetation integrity to zero is not considered appropriate, as groundcover will be maintained within the inter-panel spaces and within shaded panel areas through the implementation of a detailed groundcover management plan. Additional detail of this management plan and the adaptive management strategies to be implemented has been provided within the updated BDAR. The groundcover management plan will seek to enhance the diversity of native groundcover species within the panel area and provide suitable foraging and shelter habitat is available for a number of invertebrates, which may act as important pollinators within broader patches of woodland in adjacent areas. This in turn is likely to support species occurring within those woodland patches such as insectivorous microchiropteran bats.</p>
<ul style="list-style-type: none"> • Revise the Assessment of Serious and Irreversible Impacts (SAII) to Box-Gum Woodland EEC after PCT278 (Zone 10) is incorporated into the BDAR and BAM-C. The assessment of SAII will also include the removal of mature paddock trees associated with the EEC. 	<p>Advice from BAM Support is only impacted vegetation should be entered into the BAM-C.</p>
<ul style="list-style-type: none"> • Revise mitigation measures in the EIS to match the BDAR (Table 8-1) and to ensure stockpiling and material laydown areas are only within the assessed development footprint and not within any areas of mapped native vegetation 	<p>See section 5 of this RTS and the revised BDAR (Appendix A).</p>
<ul style="list-style-type: none"> • Mitigation measure LU4 in the EIS (Table 6-6, page 139) is to have regard for recommendations for pest plant and animal management in the BDAR (Table 8-1, pages 98-102) 	<p>The safeguards and mitigation measures for biodiversity have already been updated for consistency with Table 8-1 of the BDAR. The proponent believes this is sufficient commitment to ensure that the Pest and Weed Management Plan is consistent with commitments listed in Table 8-1 of the BDAR.</p>

DPIE Water and NRAR

Issue	Response
<p>Prior to approval:</p> <ul style="list-style-type: none"> Clarification should be provided of the ability to obtain the necessary water volumes from the site or confirm a viable supply is available, via an indication of an agreement from a water supplier. Where the water is to be sourced from a currently unauthorised source, an impact assessment and confirmation that the necessary entitlement can be obtained and traded in accordance with the relevant Water Sharing Plan will be required. 	<p>Further to DPIE Water and NRAR’s submission to the EIS, FRV have sought clarification from Riverina Water County Council (RWCC) to confirm the ability to supply the volume of water required for the proposal. Email correspondence from RWCC is provided in Appendix D.1.</p>
<ul style="list-style-type: none"> Clarification should be provided of the proposed infrastructure layout to meet the buffer requirements from watercourses as defined in the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018). This is to include a vegetated buffer for Middle Creek. 	<p>Middle Creek and Back Creek are ephemeral creek lines, best classified as 3rd/4th Order watercourses under the Strahler System. Middle Creek does not exhibit the features of a defined channel with bed and banks, is currently vegetated with grasscover and has been previously cropped. FRV will avoid waterfront land for Back Creek (30 m from each bank) and Middle Creek (20 m from each bank) as shown in Figure 2-3.</p>
<ul style="list-style-type: none"> The proponent should confirm the impact of the security fencing on floodwaters and the resultant impact to adjacent watercourses. 	<p>GHD prepared a flood study, which included recommendations for proposal infrastructure including security fencing:</p> <p><i>Where perimeter fencing around the outside of the development site crosses the waterways at Back Creek and Middle Creek, the fencing will need to be designed to not excessively capture debris carried by floodwater. Excessive debris capture will lead to higher forces of the fence and likely result in damage.</i></p> <p>The flood study was provided as Appendix J of the EIS.</p> <p>Indicative flood gates are shown in Figure 3-12 of the EIS and would be fitted to give way to water flows and prevent the trapping of debris that may alter natural flow rates.</p>
<ul style="list-style-type: none"> Landscape maps in Appendix E should specifically note the minimum riparian corridor widths in accordance with Guidelines for riparian corridors on waterfront land. 	<p>The development footprint provided on maps throughout the EIS already avoids the riparian zone of Back Creek (at a minimum of 20 m from each bank). FRV views that this is sufficient to meet the Guidelines for Controlled Activities on Waterfront Land. The updated infrastructure layout provided in Figure 2-3</p>

Issue	Response
	shows the minimum riparian corridor width for clarification.
<p>Post approval:</p> <ul style="list-style-type: none"> The proponent must obtain relevant approvals and licences under the <i>Water Management Act 2000</i> before commencing any works which intercept or extract groundwater or surface water (including from on-site dams where necessary) or for any works which have the potential to alter the flow of floodwaters. 	Noted.
<ul style="list-style-type: none"> The proponent should prepare a Construction and Operational Environmental Management Plan (incorporating an Erosion and Sediment Control Plan) prior to commencement of activities. 	Noted.
<ul style="list-style-type: none"> Works within waterfront land should be in accordance with the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018). 	Noted.

Fire and Rescue NSW

Issue	Response
<p>FRNSW reaffirm comments and recommendations previously submitted in preparation of the SEARs and maintain that these adequately address fire and life safety considerations for the proposed development.</p>	Noted. FRV considers that Fire and Rescue NSW's recommendations provided in the SEARs have already been adequately addressed in 7.4 of the EIS.
<p>It is requested that FRNSW be given the opportunity to review and provide comment on any proposed modification to the development that includes the installation of a Battery Energy Storage Systems (BESS).</p>	Battery storage is not currently included within the proposal.

Geological Survey of NSW, Division of Resources and Geoscience

Issue	Response
<p>The SEARs issued for the proposal includes the requirement for consultation during the preparation of the EIS with exploration licence holders, quarry operators and mineral title holders. The Division specifically required the proponent to include in the EIS a title search and address the project's potential impacts on existing land uses including Hurricane Hill Quarry operated by Boral Resources Pty Limited. The Division requested the proponent consult with the Geological Survey of NSW (GSNSW, within the Division) regarding biodiversity offset sites. The EIS has addressed the requirements relating to mineral resources and land use compatibility. A titles search with results shown on a map has been included in the EIS, demonstrating there are no mining or exploration titles over the site. The proponent has consulted with Boral Resources Pty Limited, operators of Hurricane Hill Quarry with a record of consultation included within the EIS. The Division notes site-specific biodiversity offsets have not been identified at this stage and the proponent proposes to retire biodiversity credits generated by the impact of the proposal through the NSW Biodiversity Offset Scheme. To ensure there is no reduction in access to prospective land for mineral exploration, or potential for sterilisation of mineral or extractive resources, the Division requests it be consulted on the proposed location of any biodiversity offset areas (both on and off site) or any supplementary biodiversity measures. Queries regarding the above information, and future requests for advice in relation to this matter, should be directed to the Division of Resources & Geoscience-Land Use team at landuse.minerals@geoscience.nsw.gov.au.</p>	<p>Noted. FRV intends to retire biodiversity credits through the through the NSW Biodiversity Offset Scheme. Should supplementary areas be sought for biodiversity conservation measures, the proponent will consult with GSNSW regarding impacts on mineral exploration or mining.</p>

Greater Hume Shire Council

Issue	Response
<p>It is advised that Council has reviewed the Environmental Impact Statement and at its November Ordinary meeting held on 20 November 2019. Council resolved to formally</p>	<p>Noted. See FRV responses to each item below.</p>

Issue	Response
<p>object to the proposed development for the following reasons:</p>	
<p><u>Reduced levels of amenity for nearby residents</u></p> <p>The EIS identifies that there are 4 uninvolved neighbouring properties that have residences or working land that will have a direct outlook onto the subject land. Council considers that residents from these properties will experience reduced amenity as the outlook from their property will change from being an agricultural landscape to one that is of an industrial appearance with a development footprint of 605 hectares. This footprint incorporates approximately 900,000 solar panels on tracker units, operation and maintenance buildings, access roads, inverter stations, high voltage substation and 2.4 metre high perimeter fencing. Council believes that the proposed landscaping will not provide a timely response to address the amenity loss of nearby receivers.</p> <p>For one resident reduced amenity levels has the potential to have an adverse impact upon their business which is running a function centre. That business provides wedding packages and is a venue for other occasions. The business has been operating from the property for many years, enjoys good levels of patronage and is a going concern.</p> <p>To provide a venue that can compete in a very competitive business environment the owners have invested significant funds into their business to provide an attractive venue. They recently have added tourist accommodation facilities and associated infrastructure.</p>	<p>A detailed visual impact assessment was undertaken for these properties and is included in Appendix K of the EIS and summarised in section 6.2.</p> <p>Substantial changes to the design of the proposal was undertaken to accommodate the concerns of these neighbouring landholders after one-to-one consultation occurred with each neighbour. These changes have been fully described in section 6.2 of the EIS.</p> <p>The visual impact assessment undertaken provided photomontages of the proposal with and without screening. R1a is the closest receptor at approximately 80 m from the legal boundary, however, with the mitigation measures in place would be located over 200 m from solar panel infrastructure. R2 and R5 are both located over 800 m from the proposal and existing vegetation already provided partial screening from these residences. The substation was relocated 100 m south of its original position to allow for additional planted screening and would place it lower in the landscape. Due to the topography of the development site, moving the substation any further site to increase its visibility from R2.</p> <p>On receipt of submissions regarding impacts on R5 (Orange Grove Gardens), including Council's submission, FRV have further amended the layout design to create a further setback for R5a. This would leave a total distance from the wedding venue to any solar farm infrastructure of 1200 m, including cropped area to retain agricultural views from this premises.</p> <p>FRV offered to plant screening vegetation over winter 2020 to increase the effectiveness of screening during construction. Near neighbours approached requested that early planting not be undertaken.</p> <p>The residential dwelling of the fourth direct neighbouring landowner to the east is located over 2.2 km from the proposal. Existing native vegetation also already runs along the eastern boundary of the proposal between this property and the proposal. Other concerns this landholder might have on impacts of the proposal on the agricultural productivity of their land such as glare and the heat island effect are addressed in sections 6.2.2 and 6.3.2 of the EIS,</p>

Issue	Response
	<p>respectively. The total setback between this landholder's property and solar farm infrastructure is 50 m when you take into consideration the 30 m setback and the 20 m revegetated Crown Road which exists between the two properties.</p> <p>FRV had a phone conference with Council's General Manager, Steven Pinnuck and Director Environment and Planning, Colin Kane on 18 March 2020. During this meeting FRV explained in detail the measures taken to the reduce environmental impacts on each of the aforementioned near neighbours. Council staff indicated that these measures are satisfactory.</p>
<p><u>Social, environmental and economic impacts</u></p> <p>It would be an adverse social and economic outcome if the Walla Walla solar farm was detrimental to the function centre business as it provides employment for local people and is supported by other businesses including those involved in transportation and catering. The function centre provides some diversification for the broader local economy.</p> <p>Council is concerned about the potential for the heat island effect to adversely impact upon localised climatic conditions and result in heat transmission out of the solar farm and into neighbouring properties. The EIS relies upon several studies that have been undertaken internationally to discuss the heat island effect caused by PV arrays however there is no cited Australian studies on the heat island effect. This is of concern to Council as it may not be appropriate to extrapolate the results of international studies on the heat island effect to localised conditions where this development is large, another nearby proposed development bigger again, there is receivers that are as close as 80 metres from the property boundary and the mean summer maximum temperature is 32.3°C.</p> <p>The EIS should have discussed what mitigation measures, other than a setback and planting of a vegetation screen, that the proponent could take to minimise adverse outcomes caused by the heat island effect.</p> <p>Council is concerned about the proposed development producing a dust nuisance during construction but particularly during its</p>	<p>FRV recognises that some people are concerned about the socio-economic impacts on the local community. The balance of socio-economic costs and benefits was addressed in section 6.4.2 of the EIS summarised below:</p> <p><i>The development site includes sections of two privately owned mixed cropping and grazing farms. Both farms are currently family operated. During specific times of the year, contractors are engaged to assist with sowing and harvesting. These activities are seasonal and would typically employ several people. Limited additional employment is supported through local transportation services and processing (cattle, sheep and grain). In an employment context, the loss of jobs associated with the reduction of agricultural activities would be replaced by approximately 21 FTE jobs created to support solar farm operations. Approximately 85% of the sheep grazing productivity would be maintained within the development site, thus continuing to support connected service providers such veterinarians, shearers, farmhands, transportation etc.</i></p> <p>While Council has objected partly on the basis of negative impacts on local business including transport and catering, a total of nine local businesses have written letters of support for the proposal due to potential economic benefits to the community, and their own businesses directly including (but not limited to): three hospitality venues, a local electrical contractor, a welding and maintenance business and two recruitment agencies.</p> <p>FRV is confident that the benefits will compensate for any potential costs (from a whole of community perspective).</p>

Issue	Response
<p>operational phase. The local area enjoys a reasonably high average rainfall and so it is not common for land in the vicinity of the proposed development to be devoid of vegetation. Consequently, nearby receptors currently do not experience any significant issues in relation to dust. Council believes that the use of tracking systems and efficient PV cells will dramatically reduce the amount of solar energy reaching the soil beneath the solar arrays and, over the thirty year life of the development, it could be increasingly difficult to maintain vegetation cover. Given the scale of the development site (605 hectares), there may be the potential for barren earth beneath solar arrays to be a significant source of dust for nearby receptors.</p> <p>In a discussion on socioeconomic impacts arising from the Walla Walla solar farm the EIS mentions that benefits will arise to local farmers and the community who will benefit from an additional source of income that is independent of agriculture. During the construction phase the EIS indicates there will be 250 staff employed with many of these drawn from the local community. The EIS reveals that peak employment is for a period of time being 8-12 months with the numbers employed dramatically reducing outside of this period. It is felt that most of the benefits from the construction employment will not be able to be capitalised upon by the Walla Walla and Culcairn community as there is very limited temporary accommodation available. Workers will most likely be accommodated in the nearby regional centre of Albury/Wodonga. The EIS provides the impression that much of the equipment such as the PV cells, tracking arrays, inverter stations and are all to be purchased from the global market.</p> <p>It is pleasing to note that employment and annual expenditure of the Walla Walla solar farm will be substantially larger than other similar developments that Council has reviewed with the operational period employment being 21 full time staff members consisting of 11 onsite, 5 in head office and 5 local contractors and projected annual expenditure of \$10 million dollars.</p>	<p>FRV had a phone conference with Council's General Manager, Steven Pinnuck and Director Environment and Planning, Colin Kane on 18 March 2020. During this meeting FRV explained the measures taken to reduce adverse impacts on local businesses and any heat island effects. Heat Island is addressed in section 6.3.2 of the EIS. Also, it is important to note the nearest local guideline for mitigating heat island effects from solar farms is the 30 m setback recommended by the Victorian Planning Panel (2018). Even though this is not a requirement by NSW, FRV has implemented this conservative 30 m setbacks for all non-involved adjoining properties.</p> <p>Following the submissions, FRV have updated the FAQ for the community to help further summaries key topics (see Appendix D.8).</p> <p>Council staff indicated that these measures are satisfactory.</p>

Issue	Response
<p>It is advised that the proponent has had minimal engagement with Council in relation to a payment to Council of a development contribution associated with the proposed development.</p> <p>Since 2012 Greater Hume Council has had a shire wide fixed development consent levy either complying with Section 94A or its replacement Section 7.12 of the <i>Environmental Planning and Assessment Act 1979</i>.</p> <p>Council has applied the provisions of its fixed development contribution plan on 283 occasions irrespective whether there is an impact of the development on local infrastructure with the funds being used for provision, extension, augmentation of public amenities and public services.</p> <p>Given Greater Hume Council's long standing application of a fixed development contributions levy and the impact of the development on the local community, a failure by the proponent to pay a development contribution to Council that is commensurate with the current Greater Hume Council's Section 7.12 <i>Development Contribution Plan 2019</i> would also be an adverse social outcome.</p>	<p>FRV recognises the value and importance of a shire-wide fixed development consent levy for development proposals assessed at the local government level to ensure that developers fulfil their obligation to contribute towards the provision of local government infrastructure and services. However, State Significant Developments assessed at the State level incur substantial financial contributions to the State Government, that go towards supporting the provision of infrastructure and services at the State level. As such, FRV certainly embraces its role as a responsible corporate citizen and would like to provide a financial contribution to support Council, but asks that Council recognises that the proposal is being assessed at the State level under the <i>EP&A Act</i>, which includes the application of fees and charges under Part 15 of the <i>Environmental Planning and Assessment Regulation 2000</i>.</p> <p>FRV met with Council on 9 December 2019 to discuss entering into a VPA with Council. FRV had a further phone conference with Council's General Manager, Steven Pinnuck and Director Environment and Planning, Colin Kane on 18 March 2020. During this meeting FRV presented the voluntary financial contribution figures in the form of upfront and on-going payments to be in the form of a VPA (refer Appendix E). Council staff indicated that these provisions for a VPA are satisfactory.</p>
<p><u>Loss of high quality agricultural land</u></p> <p>Council has reviewed the Department of Planning, Industry and Environment's <i>Large Solar Energy Guidelines</i> in which there is a discussion about the importance of site selection. Agriculture is identified as a key site constraint and the guideline refers to land meeting the following:</p> <ul style="list-style-type: none"> • Important agricultural lands, including Biophysical Strategic Agricultural Land (BSAL), irrigated cropping land, and land and soil capability classes 1, 2 and 3. Consideration should also be given to any significant fragmentation or displacement of existing agricultural industries and any cumulative impacts of multiple developments. <p>The EIS indicates that the proposal is located on soil capability Class 4 and Class 6 land. The</p>	<p>FRV have addressed the likely impacts of the proposal on the accessibility to arable agricultural and in the region in sections 6.3.1 and 7.6 of the EIS. The EIS particularly highlighted the following reasons why the proposal would not significantly impact agriculture production in the region:</p> <ul style="list-style-type: none"> • The development site would be returned to agricultural land use on decommissioning. Only the 3.2 ha substation area of the 605 ha development site would be permanently lost to agriculture as this would remain the freehold property of TransGrid. • Sheep grazing would continue within the development site over the life of the proposal at an estimated 85% capacity compared to pre-construction conditions, thus the development site does not depart from agricultural land use. • Approximately 4,359 km² (~435,900 ha) is used for agriculture within the Greater Hume

Issue	Response
<p>current use of the land comprises sheep and cattle farming. Intermittently, the main subject land is also used for canola and wheat crops. There is no figure provided in the EIS that indicates the footprint of the development in relation to the respective soil classes. It is noted that DPI Agriculture commented through the SEARS that "although the development is proposed for Class 4 and 6 land as assessed under the Land and Soil/ Capability Assessment scheme, the class 4 lands in this area are currently under review due to their value as high quality cropping farms."</p> <p>Inspections by Council of the development site and adjacent land would indicate that it is high quality agricultural land. Council has been advised that this land will be mapped as important agricultural land under the Riverina Murray Draft Important Agricultural Land Mapping project which also indicates it is high quality agricultural land. Due to its impending status as important agricultural land, the site could be considered constrained under the <i>Department of Planning, Industry and Environment's Large Solar Energy Guidelines</i>.</p> <p>The EIS indicates that existing native and exotic pastures will initially decline due to shading following PV array installation. There is a concern raised by Council that these effects maybe ongoing and the land may not benefit from thirty years of being beneath highly efficient photovoltaic cells mounted upon tracking units and indeed, may deteriorate if the vegetation is not able to be supported in this environment.</p> <p>Due to the loss of the high quality agricultural land Council believes that the proposed development may not be compatible with the RU1 zone objectives contained in the <i>Greater Hume Local Environment Plan 2012</i> which are:</p> <ul style="list-style-type: none"> • To encourage sustainable primary industry production by maintaining and enhancing the natural resource base. • To minimise the fragmentation and alienation of resource lands. • To minimise conflict between land uses within this zone and land uses within adjoining zones. 	<p>LGA. The temporary diversion of 1,935 ha (~0.24%) of agricultural land within the Greater Hume Shire would result in a negligible decrease in the overall productivity of the region.</p> <p>FRV considers that the temporary removal of 0.078% of arable agricultural land from cropping should be weighed against the social-economic benefits of the proposal:</p> <ul style="list-style-type: none"> • Strategic goals of the Commonwealth and NSW Governments for renewable energy development going forward. • The environmental benefits of solar energy production, in particular the reduction of greenhouse gas emissions. • The economic benefits of using an area with reliable solar resources and access to existing electricity infrastructure. • The benefits of alternative and increased energy supply for grid stability and reliability. <p>Existing pasture species would be maintained beneath the solar panels and resting this land from cropping would improve the soil's health over time, likely resulting in increased moisture retention and eventually, when returned to cropping, temporarily higher yields.</p> <p>FRV considers that the proposal is consistent with the RU1 zone objectives contained in the Greater Hume LEP 2012, for the following reasons:</p> <ul style="list-style-type: none"> • Fertile soil would be retained under the solar panels, available for future generations to meet their own primary agriculture/food production needs. • Sheep grazing would continue grazing the development site for the life of the solar farm. • The solar farm would not impact the value or productivity of surrounding farming land. • Solar farms are consistent with the rural landscape as panels are low-lying, with a maximum tilt height of 4 m. • Biodiversity enhancement would substantially improve connectivity for wildlife. <p>FRV had a phone conference with Council's General Manager, Steven Pinnuck and Director Environment and Planning, Colin Kane on 18 March 2020. During this meeting FRV described information from the landholders that the majority of the development site has previously been used for grazing rather than</p>

Issue	Response
<ul style="list-style-type: none"> To maintain the rural landscape character of the land. 	<p>cropping and indeed fits the description of marginal land capability (Class 4) under the Land and Soil Capability Scheme (OEH, 2012). Council staff indicated that they were satisfied with this response.</p>
<p><u>Impacts on native vegetation and Aboriginal heritage</u></p> <p>The EIS has undertaken very detailed studies concerning the biodiversity impacts and impacts on Aboriginal cultural heritage that will occur if the proposed development does proceed. Whilst Council is satisfied with the rigour of the assessment of these impacts, it is very concerned about the effect of the removal of 13.83 hectares of native vegetation, 53 paddock trees and a total loss of value of 24 items of Aboriginal cultural heritage.</p>	<p><u>Impacts to native vegetation</u></p> <p>FRV recognises the value of mature hollow-bearing paddock trees for supporting biodiversity and providing habitat for threatened species and does not want to understate the importance of retaining trees, particularly in the light of recent fire events across NSW.</p> <p>Since acquiring the proposal in June 2019, FRV has reduced the number of paddock trees that would be removed and has considered other ways to compensate their loss (in addition to retiring biodiversity credits through the NSW Biodiversity Offset Scheme. One immediate management action that can be undertaken would be to improve the connectivity food availability of the vegetation surrounding Back Creek to provide better habitat for Threatened Squirrel Gliders (<i>Petaurus norfolcensis</i>) that were recorded along the creekline during nocturnal surveys. Squirrel Gliders require dense vegetation and cannot currently utilise the majority of paddock trees within the development site.</p> <p>FRV are aware that multiple bird and mammal species are dependent on tree hollows and has committed to installing approximately 120 nest boxes across the development site. By the end of the 30 year project life, FRV anticipates that planted vegetation would be advanced enough to offer many of the habitat benefits provided by larger trees including tall branches to support stick nests.</p> <p><u>Impacts to Aboriginal heritage</u></p> <p>The final ACHAR is provided within Appendix F of this RTS. It has been finalised with regard to comments received from Registered Aboriginal Parties, in accordance with clause 80C of the National Parks and Wildlife Amendment (Aboriginal Objects and Aboriginal Places) Regulation 2010, following the consultation steps outlined in the Aboriginal Cultural Heritage Consultation Requirements for Proponents (OEH 2010).</p> <p>Existing mitigation measures provided within the EIS already include:</p> <ul style="list-style-type: none"> The proponent should prepare a Cultural Heritage Management Plan (CHMP) to

Issue	Response
	<p>address the potential for finding additional Aboriginal artefacts during the construction of the Solar Farm and management of known sites and artefacts. The CHMP should include the unexpected finds procedure to deal with construction activity. Preparation of the CHMP should be undertaken in consultation with the registered Aboriginal parties.</p> <ul style="list-style-type: none"> • In the unlikely event that human remains are discovered during the construction, all work must cease in the immediate vicinity. BCD, the local police and the registered Aboriginal parties should be notified. Further assessment would be undertaken to determine if the remains were Aboriginal or non-Aboriginal. • The development must avoid the two possible Scarred Trees (Walla Solar Farm 495495 and Walla Solar Farm 497946). A minimum 10 m buffer around each tree should be in place to protect the trees canopy and root system. • If complete avoidance of the 23 isolated find sites and 11 artefact scatters recorded within the proposal area is not possible, the artefacts within the development footprint must be salvaged prior to the proposed work commencing and moved to a safe area within the property that would not be subject to any ground disturbance. • The collection and relocation of the artefacts should be undertaken by an archaeologist with representatives of the registered Aboriginal parties and be consistent with Requirement 26 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales. A new site card/s would need to be completed once the artefacts are moved to record their new location on the AHIMS database. • A minimum 5 m buffer should be observed around all artefact scatters and isolated find sites that cannot be avoided, including those outside the development footprint. • Further archaeological assessment would be required if the proposal activity extends beyond the area assessed as detailed in this report. This would include consultation with the registered Aboriginal parties and may include further field surveys.

Issue	Response
	<p>FRV had a phone conference with Council's General Manager, Steven Pinnuck and Director Environment and Planning, Colin Kane on 18 March 2020. During this meeting FRV described the mitigation measures for Aboriginal heritage and biodiversity. Council staff indicated that they are satisfied with the mitigation measures proposed.</p>
<p><u>Traffic management and access</u></p> <p>Council's engineers have reviewed the Traffic Impact Statement contained within the EIS and they raise concerns that the unsealed portion of Benambra Road will be utilised to some degree during the construction of the facility. They believe that sealing of the Benambra Road to Schneiders Road at the full cost of the proponent should be considered.</p> <p>The following traffic related recommended conditions are provided in the event of the approval of this application:</p> <ul style="list-style-type: none"> • Road works are to be undertaken in accordance with the submitted traffic assessment. • For assessment by Council additional design plans are required for the access points from Benambra Road and across Schneiders Road. • Under Section 138 of the Roads Act 1993 any works occurring within the road reserve require the consent of Council as the road authority. 	<p>FRV have previously liaised with Council regarding the planned use and maintenance of local roads including a face to face meeting at Council's offices in September 2019, followed up with a letter provided to Council 16 September 2019, outlining the planned use of local roads and agreement to contribute to maintaining roads utilised, proportional the use of each road generated by the proposal.</p> <p>The correspondence dated 16 September detailed the planned single construction access point located in the north eastern corner of the development site, with all construction traffic accessing the site from Olympic Highway to the east. The traffic management Plan provided as Appendix F of the EIS, and correspondence provide to Council confirms that the only construction vehicles the travel on the unsealed section of Benambra Road would be the two transformers for the TransGrid Substation.</p> <p>FRV will stipulate that the construction contractor must use Olympic Highway for the transport of all staff and materials and that Benambra Road, west of the main access point, would not be used under the contract.</p> <p>The following mitigation measure has been removed:</p> <ul style="list-style-type: none"> • The proponent would repair any damage resulting from project traffic (except that resulting from normal wear and tear) as required at the proponent's cost. <p>The following mitigation measures have been added:</p> <ul style="list-style-type: none"> • <i>The proponent shall engage an appropriately qualified person to prepare a Road Dilapidation Report for transport routes, particularly intersections, to be used during the construction (and decommissioning) activities, in consultation with the relevant road authority (Roads and Maritime Services and Council). This report is to address all road related infrastructure. Reports must be prepared prior to commencement of, and after completion of, construction (and</i>

Issue	Response
	<p><i>decommissioning). Any damage resulting from the construction (or decommissioning) traffic, except that resulting from normal wear and tear, must be repaired at the proponent's cost.</i></p> <ul style="list-style-type: none"> <i>Design plans for the access points on Benambra Road and across Schneiders Road would be developed in consultation with Council.</i> <p>FRV had a phone conference with Council's General Manager, Steven Pinnuck and Director Environment and Planning, Colin Kane on 18 March 2020. During this meeting FRV described the mitigation measures for Aboriginal heritage and biodiversity. Council staff indicated that they are satisfied with the mitigation measures proposed.</p>

Heritage Council of NSW

Issue	Response
<p>As per our email correspondence dated 12 February 2019, the subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. It does not contain any known historic archaeology. Accordingly, no referral to the Heritage Council of NSW was required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.</p>	<p>Noted.</p>

NSW Environmental Protection Authority (EPA)

Issue	Response
<p>I refer to the planning referral received by the Environment Protection Authority (EPA) via the Major Projects Planning Portal on 25 October 2019 requesting our comments on the Environmental Impact Statement for the proposed Walla Walla Solar Farm.</p> <p>The EPA has responsibilities for pollution control and environmental management for scheduled activities under the Protection of the Environment Operations Act 1997. Based on the information provided the proposed development is not a scheduled activity under the Protection of the Environment Operations Act 1997 and the Walla Walla solar farm will not require an Environment Protection Licence. Under the Protection of the Environment Operations Act 1997 Greater Hume Shire Council will be the Appropriate Regulatory Authority for pollution control and environmental management issues for this proposal should it be approved.</p> <p>On this basis the EPA has no further comments to make in relation to this proposal and requires no further consultation in relation to this matter.</p>	<p>Noted.</p>

NSW Rural Fire Service (RFS), Granville NSW

Issue	Response
<p>The New South Wales Rural Fire Service (NSW RFS) has considered the information submitted and notes that the proposed development has the potential to increase the level of bushfire risk within the landscape and, the development may be impacted upon during a bushfire event. As such, the proposed development should incorporate the following bushfire protection measures:</p> <p>A draft Fire Management Plan (FMP) shall be prepared for the proposed development and provided to the local NSW RFS District Office for comment. Any return comment from the District shall be adopted into an amended FMP. As a minimum, the FMP shall include:</p> <ul style="list-style-type: none"> • 24-hour emergency contact details including alternative telephone contact. 	<p>Bushfire preparedness is consistent with the <i>Planning for Bushfire Protection: A guide of councils, planners, fire authorities and developers</i> (NSW RFS 2019) (<i>Planning for Bushfire Protection 2019</i>), is addressed in section 7.54 of the EIS.</p> <p>FRV believe they have been thorough in modifying the infrastructure layout to incorporate seven additional emergency access points, access to water via two metered points at the northern and southern points where the waterpipe enters and leaves the development site and 12 x 20,000 L water storage tanks specifically for firefighting distributed around the perimeter of the development site and a 10 m APZ directly outside the perimeter security fence.</p>

Issue	Response
<ul style="list-style-type: none"> • Site infrastructure plan. • Firefighting water supply plan that provides suitable fittings and identifies operational access for fire fighting vehicles to connection points. • Site access and internal road plan that has been designed and constructed in accordance with the fire trail specifications defined in section 4.1.3(3) of <i>Planning for Bush Fire Protection 2006</i>. • Construction of APZs around all critical assets and infrastructure and their continued maintenance. • Location of hazards (physical, chemical, and electrical) that will impact on the firefighting operations and procedures to manage identified hazards during the firefighting operations. • Mitigation measures designed to prevent fire occurring within the site, and prevent fire escaping the site and developing into a bush/grass fire risk to the surrounding area. • Such additional matters as required by the NSW RFS District Office. 	<p>FRV notes that a Fire Management Plan post determination would incorporate the requested items listed.</p>
<p>The entire solar array development footprint shall be managed as an asset protection zone as outlined within section 4.1.3 of <i>Planning for Bush Fire Protection 2006</i> and the NSW RFS document <i>Standards for asset protection zones</i>.</p>	<p>While managing the development site to minimise bushfire risk is a top priority of the proposal, the proponent requires the flexibility to balance the need to reduce fuel loads with maintaining groundcover to reduce erosion and maintain biodiversity. Bushfire preparedness, as detailed in section 7.4.3 of the EIS has been developed in consultation with local FRS brigades and already aligns with <i>Planning for Bush Fire Protection 2019</i>.</p>
<p>To allow for emergency service personnel to undertake property protection activities, a 10-metre defendable space, managed as an asset protection zone, shall be provided around the buildings, substation, battery storage units, around the outside perimeter of the solar array, and around all areas of unmanaged vegetation being retained within the site.</p>	<p>Noted. Battery storage is not currently included in the proposal.</p>
<p>An access road designed and constructed to comply with the specifications outlined in section 4.1.3(3) of <i>Planning for Bush Fire Protection 2006</i></p>	<p>An access road designed and constructed in accordance with section 3.4 of the updated 2019 guideline would be provided along the property</p>

Issue	Response
<p>shall be provided along the property boundary/fence line and around all areas of unmanaged vegetation being retained within the site.</p>	<p>boundary/fence line and around all areas of unmanaged vegetation being retained within the site.</p>
<p>All proposed internal roads shall comply with the design and construction specifications outlined in section 4.1.3(3) of <i>Planning for Bush Fire Protection 2006</i>.</p>	<p>FRV notes that <i>Planning for Bush Fire Protection 2006</i> has been replaced by <i>Planning for Bush Fire Protection 2019</i>. Internal roads would be designed and constructed in accordance with the updated guideline.</p>
<p>A minimum 20,000-litre water supply (tank) fitted with a 65mm Storz fitting shall be located adjoining the internal property access road within the required asset protection zone.</p>	<p>FRV has committed to locate 2 x 20,000 L water supply tanks fitted with 65mm Storz fittings at six locations around the development site perimeter adjoining internal access roads.</p>
<p>All landscaping within the site shall comply with the principles of Appendix 5 of <i>Planning for Bush Fire Protection 2006</i>.</p>	<p>Landscaping within the development site would comply with Appendix 6 of the updated <i>Planning for Bush Fire Protection 2019</i>.</p>

Roads and Maritime Services (RMS)

Issue	Response
<p>Section 6.6.6 of the EIS lists the proposed safeguards and mitigation measures for traffic and transport related issues. The submitted reports acknowledge that this development will require the preparation of an appropriate Construction Traffic Management Plan. As the proposal relies on access via the classified and local road network this plan should be finalised in consultation with the relevant road authorities, in this case being both Roads and Maritime Services and Council.</p>	<p>Noted.</p>
<p>Roads and Maritime is mainly concerned with the impact of the development on the safety and efficiency of the road network. Roads and Maritime emphasises the need, particularly during the construction phase of this development, to minimise the impacts on the existing road network. As the subject site is to be accessed via an intersection with the Olympic Highway which is located within a 100 km/h speed zone the</p>	<p>Noted.</p>

Issue	Response
<p>following conditions are proposed for road safety reasons.</p> <p>Roads and Maritime Services has assessed the Development Application based on the documentation provided and would raise no objection to the development proposal subject to the Consent Authority ensuring that the development is undertaken in accordance with the information submitted as amended by the inclusion of the following as conditions of consent (if approved):-</p>	
<p>Prior to the commencement of construction activities on the development site a Traffic Management Plan shall be prepared in consultation with the relevant road authorities (Council and Roads and Maritime Services) to outline measures to manage traffic related issues associated with the development, particularly during the construction and decommission processes. The appointed transport contractor shall be involved in the preparation of this plan. The plan shall address all light and heavy traffic generation to the development site and detail the potential impacts associated with the development, the mitigation measures to be implemented, and the procedures to monitor and ensure compliance. This plan shall address, but not necessarily be limited to the following;</p> <ol style="list-style-type: none"> i. Details of traffic volumes and routes to be used by heavy and light vehicles, volumes, vehicle type and length, timing, and frequency, ii. Finalise details of any required road-specific mitigation measures. iii. Require that all vehicular access to the site be via the approved access route. iv. Details of measures to be employed to ensure safety of road users and minimise potential conflict with project generated traffic, v. Proposed hours for construction activities, as night-time construction presents additional traffic related issues to be considered. vi. The management and coordination of the movement of vehicles for construction and worker related access to the site and to limit disruption to other motorists, emergency vehicles, school bus timetables and school zone operating times. 	<p>FRV has already committed to develop a Traffic Management Plan (TMP) before the commencement of construction (as per section 6.6.6 of this EIS). The relevant safeguard and mitigation measure relating specifically to the contents of the TMP has been amended in accordance with RMS' comments:</p> <p>A Traffic Management Plan would be developed and implemented during construction and decommissioning. The Traffic Management Plan would include but not be limited to:</p> <ul style="list-style-type: none"> • Prior to construction, a pre-conditioning survey of the relevant sections of the existing road network, to be undertaken in consultation with Greater Hume Shire. • Assessment of road condition prior to construction on all local roads that would be utilised. • A program for monitoring road condition, to repair damage exacerbated by the construction and decommissioning traffic. • The designated routes of construction traffic to the site. • Carpooling/shuttle bus arrangements to minimise vehicle numbers during construction. • Scheduling of deliveries. • Community engagement regarding traffic impacts for nearby residents. • Consideration of cumulative impacts. • Traffic controls (speed limits, signage, etc.). • Procedure to monitor traffic impacts and adapt controls (where required) to reduce the impacts. • Providing a contact phone number to enable any issues or concerns to be rapidly identified

Issue	Response
<p>vii. The management of construction staff access to the works site is to include the provision of bus transfer to the site and strategies and measures employed to manage the risks of driver fatigue and driver behaviour.</p>	<p>and addressed through appropriate procedures.</p> <ul style="list-style-type: none"> Water to be used on unsealed roads (including internal roads) to minimise dust generation through increased traffic use.
<p>viii. Measures to address adverse climatic conditions that may affect road safety for vehicles uses during construction, operation and decommissioning of the facility (e.g. fog, dust, wet weather).</p>	<p>Following construction, a post condition survey of the relevant sections of the existing road network would be undertaken to ensure it is of similar condition as prior to construction.</p>
<p>ix. Procedures for informing the public where any road access will be restricted as a result of the project.</p>	<p>Has been replaced with the following:</p>
<p>x. Any proposed precautionary measures such as signage to warn road users such as motorists about the construction activities for the project.</p>	<p>A Traffic Management Plan (TMP) would be developed and implemented during construction and decommissioning. This TMP would address but not be limited to:</p>
<p>xi. A Driver Code of Conduct to address such items as; appropriate driver behaviour including adherence to all traffic regulations and speed limits, safe overtaking and maintaining appropriate distances between vehicles, etc and appropriate penalties for infringements of the Code.</p>	<ul style="list-style-type: none"> Details of traffic volumes and routes to be used by heavy and light vehicles, volumes, vehicle type and length, timing, and frequency. Finalise details of any required road-specific mitigation measures.
<p>xii. Details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck movements to and from the site.</p>	<ul style="list-style-type: none"> Require that all vehicular access to the site be via the approved access route. Details of measures to be employed to ensure safety of road users and minimise potential conflict with project generated traffic. Proposed hours for construction activities, as night-time construction presents additional traffic related issues to be considered. The management and coordination of the movement of vehicles for construction and worker related access to the site and to limit disruption to other motorists, emergency vehicles, school bus timetables and school zone operating times. The management of construction staff access to the works site is to include the provision of bus transfer to the site and strategies and measures employed to manage the risks of driver fatigue and driver behaviour. Measures to address adverse climatic conditions that may affect road safety for vehicles uses during construction, operation and decommissioning of the facility (e.g. fog, dust, wet weather).

Issue	Response
	<ul style="list-style-type: none"> • <i>Procedures for informing the public where any road access will be restricted as a result of the project.</i> • <i>Any proposed precautionary measures such as signage to warn road users such as motorists about the construction activities for the project.</i> • <i>A Driver Code of Conduct to address such items as; appropriate driver behaviour including adherence to all traffic regulations and speed limits, safe overtaking and maintaining appropriate distances between vehicles, etc. and appropriate penalties for infringements of the Code.</i> • <i>Details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck movements to and from the site.</i>
<p>The Proponent shall engage an appropriately qualified person to prepare a Road Dilapidation Report for transport routes, particularly intersections, to be used during the construction (and decommissioning) activities, in consultation with the relevant road authority (Roads and Maritime Services and Council). This report is to address all road related infrastructure. Reports must be prepared prior to commencement of, and after completion of, construction (and decommissioning). Any damage resulting from the construction (or decommissioning) traffic, except that resulting from normal wear and tear, must be repaired at the Proponent’s cost. The applicant is accountable for this process, rather than the proposed haulage contractor. Such work shall be undertaken at a time as agreed upon between the Proponent and relevant road authorities.</p>	<p>See traffic response to Greater Hume Shire Council above.</p>
<p>Prior to the commencement of construction on-site, the Proponent must undertake all works to upgrade any road, its associated road reserve and any public infrastructure in that road reserve, to a standard suitable for use by heavy vehicles to meet any reasonable requirements that may be specified by the relevant roads authority. The design and specifications, and construction, of these works must be completed and certified by an appropriately qualified person to be to a standard to accommodate the traffic generating requirements of the project. On Classified Roads the geometric road design and</p>	<p>The following mitigation measures have been removed:</p> <ul style="list-style-type: none"> • <i>Any upgrades would be subject to detailed design and would be designed and constructed to the relevant Australian road design standards.</i> <p>The following mitigation measures have been added:</p> <ul style="list-style-type: none"> • <i>Prior to the commencement of construction, the proponent will undertake works to upgrade any road, its associated road reserve and any public infrastructure in that road reserve, to a standard suitable</i>

Issue	Response
<p>pavement design must be to the satisfaction of Transport for NSW.</p>	<p>for use by heavy vehicles, to meet any reasonable requirements that may be specified by the relevant roads authority.</p> <ul style="list-style-type: none"> • The design and specifications, and construction, of any road works must be completed and certified by an appropriately qualified person to be to a standard to accommodate the traffic generating requirements of the project • On Classified Roads the geometric road design and pavement design must be to the satisfaction of Transport for NSW.
<p>A management plan to provide measures to suppress dust generation from the development site and the transportation route shall be prepared and implemented to the satisfaction of Council and Roads and Maritime Services.</p>	<p>The following mitigation measure has been added:</p> <ul style="list-style-type: none"> • A management plan to provide measures to suppress dust generation from the development site and the transportation route shall be prepared and implemented to the satisfaction of Council and Roads and Maritime Services.
<p>Glint and glare from the solar panels shall not cause a nuisance, disturbance or hazard to the travelling public on the public road network. In the event of glint or glare from the solar plant being evident from a public road, the proponent shall immediately implement glare mitigation measures such as construction of a barrier (e.g. fence) or other approved device to remove any nuisance, distraction and/or hazard caused as a result of glare from the solar panels.</p>	<p>FRV believes it has already adequately addressed glint and glare in section 6.2.2 of the EIS and is confident that light reflection from solar infrastructure would be low and not cause a nuisance or pose a safety hazard to traffic using the public road network. As such, to alleviate concerns regarding this issue the following mitigation measure has been added to the mitigation and safeguard list for Visual Amenity (section 6.2.4 of the EIS):</p> <ul style="list-style-type: none"> • In the event of glint or glare from the solar plant being evident from a public road, the proponent shall immediately implement glare mitigation measures such as construction of a barrier (e.g. fence) or other approved device to remove any nuisance, distraction and/or hazard caused as a result of glare from the solar panels.
<p>Any works within the road reserve of the Sturt Highway requires approval under Section 138 of the Roads Act 1993 from the road authority (Council) and concurrence from Roads and Maritime Services prior to commencement of any such works. The developer is responsible for all public utility adjustment/relocation works, necessitated by the development and as required by the various public utility authorities and/or their agents.</p>	<p>FRV notes that RMS means Olympic Highway and not Sturt Highway.</p> <p>The proponent has already committed to obtain section 138 consent from the relevant road authorities to perform works in the road reserve (See section 6.6.6 of the EIS).</p>

Issue	Response
<p>Works associated with the development shall be at no cost to Roads and Maritime Services.</p>	<p>The proponent has already committed to cover the road-related costs associated with the proposal:</p> <ul style="list-style-type: none"> <i>The proponent would repair any damage resulting from project traffic (except that resulting from normal wear and tear) as required at the proponent's cost.</i>

TransGrid

Issue	Response
<p>TransGrid is working closely with FRV Services Australia in relation to the SF connection</p>	<p>Noted.</p>
<p>TransGrid is currently working on Connection Processes Agreement with FRV Services Australia to complete detailed scoping studies and designs, with a view to enter into formal project and connection agreements for the generation connection.</p>	<p>Noted.</p>

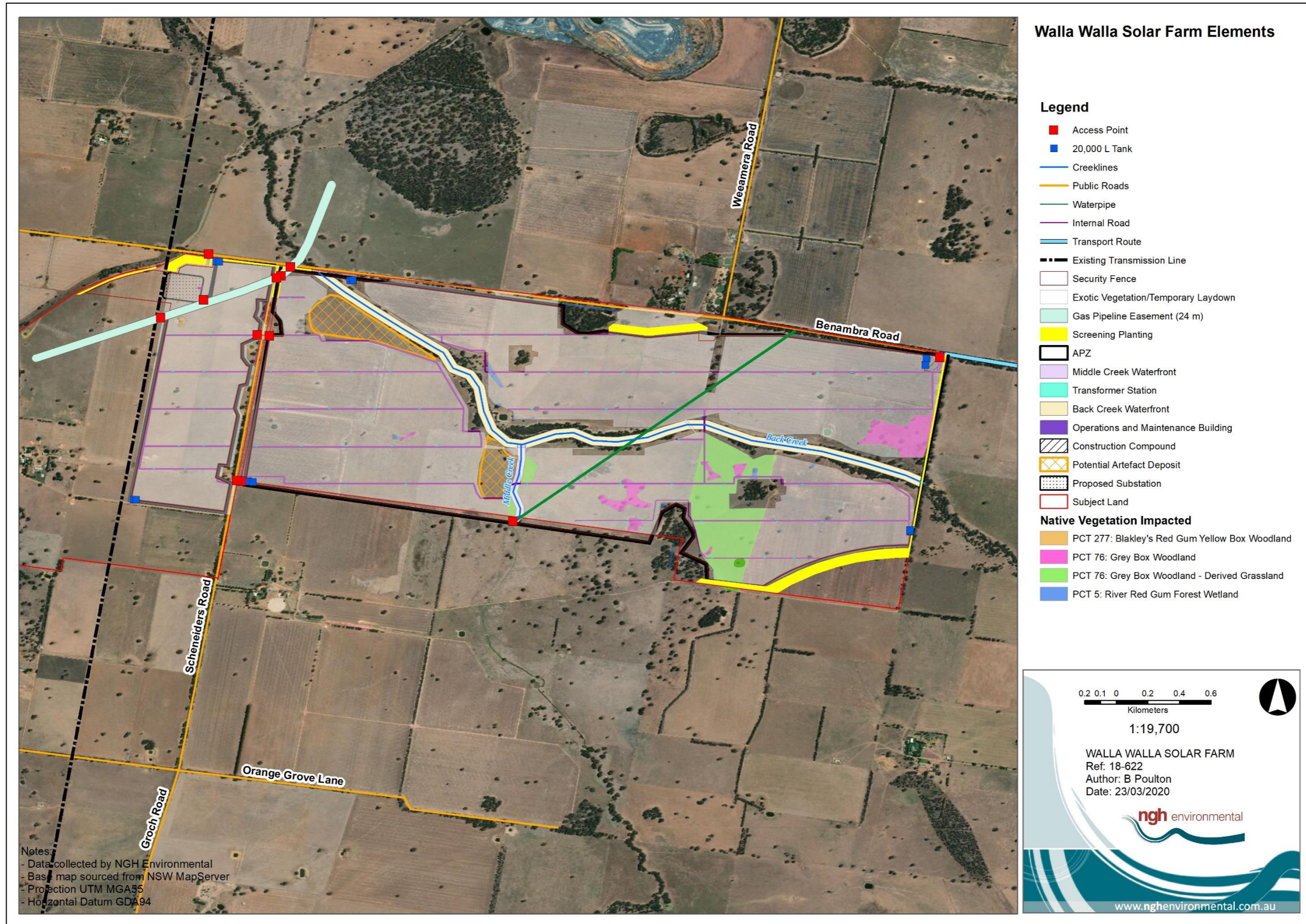


Figure 4-3 Proposed infrastructure element locations

5. UPDATED MITIGATION MEASURES

In response to submission received, this report proposes a number of changes to the safeguards and mitigation measures detailed in the EIS. Table 5-1 provides the full list of safeguards and mitigation measures with those amended highlighted in grey. New text is shown underlined and removed text shown with strikethrough.

*C = Construction Phase, O = Operational Phase and D = Decommission

Table 5-1 Revised safeguards and mitigation measures

No.	Safeguards and mitigation measures	C	O	D
<u>Visual</u>				
VA1	<p>Screening would be required on-site, generally in accordance with the Landscape Plan developed in consultation with neighbouring landholders.</p> <ul style="list-style-type: none"> Plantings would be more than one row deep and where practical, planted on specific sections outside of the permitter fence, to break up views of infrastructure including the fencing. Screening within the vicinity of Residences 1a&b and 2 and 5a would be at least <u>six</u> rows deep to allow for maximum screening. The plant species to be used in the screen would be native and derived from the naturally occurring vegetation community in the area. They should be fast growing and comprise a mixture of trees and shrubs capable of reaching a height of 3 to 4 m within 10 years. Species selection is being undertaken in consultation with affected near neighbours and a landscape architect. Planting would be 2 months of completion of construction, so actual views of infrastructure are known or during winter/spring to increase the chance of plant survival. <p>The screen would be maintained for the operational life of the solar farm. Dead plants would be replaced. Pruning and weeding would be undertaken as required to maintain the screen's visual amenity and effectiveness in breaking up views.</p>	C	O	D
VA2	<p>Prior to the commencement of construction, a detailed landscape plan would be prepared including:</p> <ul style="list-style-type: none"> Screening location. Species type. Planting density and spacing. Method for planting. Descriptive measures that would be implemented to ensure vegetative screening is successful (i.e. irrigation or other watering method). <p>A program to manage, monitor and report on the effectiveness of implemented measures.</p>	Design stage		
VA3	<p>The materials and colour of onsite infrastructure would, where practical, be non-reflective and in keeping with the materials and colouring of existing infrastructure to blend with the landscape.</p>	Design stage		
VA4	<p>During construction, dust would be controlled in response to visual cues. Areas of soil disturbed by the project would be rehabilitated progressively or immediately post-construction, reducing views of bare soil.</p>	C		

No.	Safeguards and mitigation measures	C	O	D
VA5	Construction night lighting would be minimised to the maximum extent practicable (i.e. manually operated safety lighting at main component locations). It would be directed away from roads and residents so as not to cause light spill hazardous to drivers.	C	O	D
VA6	The vast majority on construction vehicles would enter the development site via the north eastern entrance on Benambra Road, 2.6 km off Olympic Highway to minimise impact on residences.	C		
VA7	<u>In the event of glint or glare from the solar plant being evident from a public road, the proponent shall immediately implement glare mitigation measures such as construction of a barrier (e.g. fence) or other approved device to remove any nuisance, distraction and/or hazard caused as a result of glare from the solar panels.</u>	C	O	
VA8	<u>Fast growing Acacia species would be planted within vegetation screening areas approximately 8 months prior to the commencement of construction to enhance the effectiveness of visual impact mitigation.</u>	Pre-construction		
Land use				
LU1	Consultation with adjacent landholders would be ongoing to manage interactions between the solar farm and other properties.	C	O	D
LU2	Consultation would be undertaken with TransGrid regarding connection to the overhead energy transmission infrastructure.	C		
LU3	A Rehabilitation and Decommissioning Management Plan would be prepared in consultation with DPIE and the landowner prior to decommissioning. The Rehabilitation and Decommissioning Management Plan is to include: <ul style="list-style-type: none"> • Removal of all infrastructure. • Removal of gravel from internal access tracks in consultation with landowners. • Reverse any compaction by mechanical ripping. • Targets and standards to indicate successful rehabilitation of disturbed areas. These targets and standards should be applied to rehabilitation activities once the proposal is decommissioned. 			D
LU4	A Pest and Weed Management Plan would be prepared to manage the occurrence of noxious weeds and pest species across the site during construction and operation. The Pest and Weed Management Plan must be prepared in accordance with Greater Hume Shire and DPIE requirements. Where possible integrate weed and pest management with adjoining landowners. Pest control would likely be carried out on a district-wide basis.	C	O	
LU5	The proponent would consult with GSNSW in relation mineral exploration, or potential for sterilisation of mineral resources.	C		
LU6	Construction and operations personnel would drive carefully and below the designated speed limit according to the Traffic Management Plan to minimise dust generation and disturbance to livestock.	C	O	D
LU7	Underground cabling and all underground infrastructure to a depth of 2500 cm would be removed on decommissioning.	C		

No.	Safeguards and mitigation measures	C	O	D
LU8	Sheep grazing would be used to control weeds and grass growth, and to maintain agricultural production at the site.		<u>O</u>	
<u>LU9</u>	<u>No infrastructure including buildings, roads pavement, pipeline cable, fence wastewater treatment plant (or irrigation area) will be constructed within the gas pipeline easement without the written consent from APA.</u>	<u>C</u>	<u>O</u>	<u>D</u>
<u>LU10</u>	<u>No vegetation or structure prohibiting pipeline maintenance would be permitted within the gas pipeline easement.</u>	<u>C</u>	<u>O</u>	<u>D</u>
<u>LU11</u>	<u>APA and Riverina Water would always be provided access to their infrastructure and associated easements within the development site.</u>	<u>C</u>	<u>O</u>	<u>D</u>
<u>LU12</u>	<u>The proponent must make good (at the applicant's cost) any hazards or risks to the Barnawartha-Culcairn pipeline (including cathodic protection systems), caused by powerlines.</u>	<u>C</u>	<u>O</u>	<u>D</u>
<u>LU13</u>	<u>Screening vegetation would maintain clearance zones for the gas pipeline and water pipeline easements of 3 m and 5 m respectively including overhanging vegetation.</u>	<u>C</u>	<u>O</u>	<u>D</u>
<u>LU14</u>	<u>A Construction Environmental Management Plan would be developed in consultation with APA and provide to them for input and endorsement prior to the commencement of construction.</u>	<u>C</u>		
<u>LU15</u>	<u>The design of any infrastructure services shall minimise encroachment on the gas pipeline easement. Any application for an APA permit for an easement crossing would be required to demonstrate that an alternative route, avoiding the easement, is not feasible.</u>	<u>C</u>	<u>O</u>	<u>D</u>
<u>LU16</u>	<u>The gas pipeline operator would be provided access of the easement at all times to facilitate prompt maintenance and repairs. Site access would be through interlocking padlocks, so APA has keyed access as any time. APA field officers must undertake any necessary site induction to facilitate unaccompanied access.</u>	<u>C</u>	<u>O</u>	<u>D</u>
<u>Socio-economic</u>				
SE1	A Community and Stakeholder Engagement Plan (CSEP) would be implemented during construction to manage impacts to community stakeholders, including but not limited to: <ul style="list-style-type: none"> • Protocols to keep the community updated about the progress of the project and project benefits. • Protocols to inform relevant stakeholders of potential impacts (haulage, noise etc.). Protocols to respond to any complaints received.	<u>C</u>	<u>O</u>	
SE2	Liaise with local industry representatives to maximise the use of local contractors, manufacturing facilities, materials.	<u>C</u>	<u>O</u>	
SE3	Liaise with local representatives regarding accommodation options for staff, to minimise adverse impacts on local services.	<u>C</u>		<u>D</u>
SE4	Liaise with local tourism industry and council representatives to manage potential timing conflicts or cooperation opportunities with local events.	<u>C</u>		<u>D</u>
<u>Noise and vibrations</u>				

No.	Safeguards and mitigation measures	C	O	D
NS1	Works should be undertaken during standard working hours only. (Except for the connection to substation): <ul style="list-style-type: none"> • Monday – Friday 7am to 6pm. • Saturday 8am to 1pm. • No work on Sundays or public holidays. 	C		
NS2	All staff onsite should be informed of procedures to operate plant and equipment in a quiet and efficient manner.	C	O	D
NS3	Consult with R1 during pre-construction to develop suitable mitigation measures. A dedicated Neighbourhood Liaison Officer would be appointed. with the landowner's permission.	C		D
NS4	A letterbox drop would be prepared and provided to residences in close proximity to the works. The letter would contain details of the proposed works including timing and duration and a contact person for any enquiries or complaints.	C	O	D
NS5	No inverters to be installed within a 400 m radius of R1a.	C	O	
NS6	Develop and implement construction noise management plan	C		
NS7	Regular inspection and maintenance of equipment to ensure that plant is in good condition.	C	O	D
Traffic				
TT1	A Haulage Plan would be developed and implemented during construction and decommissioning, including but not limited to: <ul style="list-style-type: none"> • Assessment of road routes to minimise impacts on transport infrastructure and residential dwellings. • Scheduling of deliveries of major components to minimise safety risks (on other local traffic). • Traffic controls (signage and speed restrictions etc.). 	C		D
TT2	A Traffic Management Plan would be developed and implemented during construction and decommissioning. The Traffic Management Plan would include but not be limited to: <ul style="list-style-type: none"> • Prior to construction, a pre-conditioning survey of the relevant sections of the existing road network, to be undertaken in consultation with Greater Hume Shire. • Assessment of road condition prior to construction on all local roads that would be utilised. • A program for monitoring road condition, to repair damage exacerbated by the construction and decommissioning traffic. • The designated routes of construction traffic to the site. • Carpooling/shuttle bus arrangements to minimise vehicle numbers during construction. • Scheduling of deliveries. • Community engagement regarding traffic impacts for nearby residents. • Consideration of cumulative impacts. • Traffic controls (speed limits, signage, etc.). • Procedure to monitor traffic impacts and adapt controls (where required) to reduce the impacts. 	C		D

No.	Safeguards and mitigation measures	C	O	D
	<ul style="list-style-type: none"> ● Providing a contact phone number to enable any issues or concerns to be rapidly identified and addressed through appropriate procedures. ● Water to be used on internal roads to minimise dust generation through increased traffic use. <p>Following construction, a post condition survey of the relevant sections of the existing road network would be undertaken to ensure it is of similar condition as prior to construction.</p>			
TT2	<p><u>A Traffic Management Plan (TMP) would be developed and implemented during construction and decommissioning. This TMP would address but not be limited to:</u></p> <ul style="list-style-type: none"> ● <u>Details of traffic volumes and routes to be used by heavy and light vehicles, volumes, vehicle type and length, timing, and frequency.</u> ● <u>Finalise details of any required road-specific mitigation measures.</u> ● <u>Require that all vehicular access to the site be via the approved access route.</u> ● <u>Details of measures to be employed to ensure safety of road users and minimise potential conflict with project generated traffic.</u> ● <u>Proposed hours for construction activities, as night-time construction presents additional traffic related issues to be considered.</u> ● <u>The management and coordination of the movement of vehicles for construction and worker related access to the site and to limit disruption to other motorists, emergency vehicles, school bus timetables and school zone operating times.</u> ● <u>The management of construction staff access to the works site is to include the provision of bus transfer to the site and strategies and measures employed to manage the risks of driver fatigue and driver behaviour.</u> ● <u>Measures to address adverse climatic conditions that may affect road safety for vehicles uses during construction, operation and decommissioning of the facility (e.g. fog, dust, wet weather).</u> ● <u>Procedures for informing the public where any road access will be restricted as a result of the project.</u> ● <u>Any proposed precautionary measures such as signage to warn road users such as motorists about the construction activities for the project.</u> ● <u>A Driver Code of Conduct to address such items as; appropriate driver behaviour including adherence to all traffic regulations and speed limits, safe overtaking and maintaining appropriate distances between vehicles, etc. and appropriate penalties for infringements of the Code.</u> ● <u>Details of procedures for receiving and addressing complaints from the community concerning traffic issues associated with truck movements to and from the site.</u> 	C		D
TT3	Obtain a section 138 Consent from Greater Hume Shire to perform works within the road reserve.	C		
TT4	Any upgrades would be subject to detailed design and would be designed and constructed to the relevant Australian road design standards.	Design Stage		
TT4	<u>Prior to the commencement of construction, the proponent will undertake works to upgrade any road, its associated road reserve and any public infrastructure in that road reserve, to a standard suitable for use by heavy</u>	Pre-construction		

No.	Safeguards and mitigation measures	C	O	D
	<u>vehicles, to meet any reasonable requirements that may be specified by the relevant roads authority.</u>			
TT5	<u>The design and specifications, and construction, of any road works must be completed and certified by an appropriately qualified person to be to a standard to accommodate the traffic generating requirements of the project</u>	<u>C</u>		<u>D</u>
TT6	<u>On Classified Roads the geometric road design and pavement design must be to the satisfaction of Transport for NSW.</u>	<u>C</u>		<u>D</u>
TT7	<u>A management plan to provide measures to suppress dust generation from the development site and the transportation route shall be prepared and implemented to the satisfaction of Council and Roads and Maritime Services.</u>	<u>C</u>		
TT5	The proponent would repair any damage resulting from project traffic (except that resulting from normal wear and tear) as required at the proponent's cost.	C		D
TT8	<u>The proponent shall engage an appropriately qualified person to prepare a Road Dilapidation Report for transport routes, particularly intersections, to be used during the construction (and decommissioning) activities, in consultation with the relevant road authority (Roads and Maritime Services and Council). This report is to address all road related infrastructure. Reports must be prepared prior to commencement of, and after completion of, construction (and decommissioning). Any damage resulting from the construction (or decommissioning) traffic, except that resulting from normal wear and tear, must be repaired at the proponent's cost.</u>	<u>C</u>		<u>D</u>
TT9	<u>Design plans for the access points on Benambra Road and across Schneiders Road would be developed in consultation with Council.</u>	<u>C</u>		
<u>Water use, quality (surface and groundwater) and hydrology</u>				
WA1	All staff would be appropriately trained through toolbox talks for the minimisation and management of accidental chemical (e.g. fuel) spills.	C	O	D
WA2	All fuels, chemicals, and liquids would be stored at least 50 m away from any waterways or drainage lines and would be stored in an impervious bunded area.	C	O	D
WA3	Adequate incident management procedures would be incorporated into the Construction and Operation Environmental Management Plans, including requirement to notify EPA for incidents that cause material harm to the environment (refer s147-153 POEO Act).	C	O	D
WA4	The refuelling of plant and maintenance of machinery would be undertaken in impervious bunded areas.	C	O	D
WA5	Machinery would be checked daily to ensure there is no oil, fuel or other liquids leaking from the machinery. All staff would be appropriately trained through toolbox talks for the minimisation and management of accidental spills.	C		D
WA6	Erosion and sediment control measures that would be implemented to mitigate any impacts in accordance with Managing Urban Stormwater: Soils & Construction (Landcom 2004).	C	O	D
WA7	Ensure appropriate drainage controls are incorporated into the design.	Design		
WA8	Implement flood impact design controls recommended in the Walla Walla Solar Development – Site Flood Assessment (GHD, 2019).	Design C		
<u>Biodiversity</u>				
BD1	Timing works to avoid critical lifecycle events such as breeding or nursing:	C		

No.	Safeguards and mitigation measures	C	O	D
	<ul style="list-style-type: none"> Hollow-bearing trees would not be removed during breeding and hibernation season (Spring to Summer). If clearing outside of this period cannot be achieved, pre-clearing surveys would be undertaken by an ecologist or suitably qualified person to ensure no impacts to fauna would occur. 			
BD2	Implementing clearing protocols including pre-clearing surveys, daily surveys and staged clearing. A trained ecologist or licensed wildlife handler would be present during clearing events and complete: <ul style="list-style-type: none"> Pre-clearing checklist. Tree clearing procedure. 	C		
BD3	Relocate habitat features (fallen timber, hollow logs) from the development site to adjacent area for habitat enhancement.	C		
<u>BD4</u>	<u>Approved clearing limits to be clearly delineated with temporary fencing or similar prior to construction commencing.</u>	<u>C</u>		
<u>BD5</u>	<u>No stockpiling or storage within dripline of any mature trees.</u>	<u>C</u>	<u>O</u>	<u>D</u>
<u>BD6</u>	<u>In areas to clear adjacent to areas to be retained, chainsaws would be used rather than heavy machinery to minimise risk of unauthorised disturbance.</u>	<u>C</u>		
<u>BD7</u>	<u>Access to the Box-Gum Woodland EEC would not be permitted via vehicles to reduce understorey impacts and clearing.</u>	<u>C</u>		
<u>BD8</u>	<u>A Construction Environmental Management Plan would include measures to avoid noise encroachment on adjacent habitats such as avoiding night works as much as possible.</u>	<u>C</u>		
BD9	Light spill from the proposal would be reduced by: <ul style="list-style-type: none"> Avoiding night works. Directing lights away from vegetation. Using light shields where appropriate. 	C	O	D
BD10	Adaptive dust monitoring programs to control air quality: <ul style="list-style-type: none"> Daily monitoring of dust generated by construction and operation activities. Construction would cease if dust observed blown from site until control measures were implemented. All activities relating to the proposal would be undertaken with the objective of preventing visible dust emissions from the development site. 	C		
<u>BD11</u>	<u>Prior to construction commencing, exclusion fencing, and signage would be installed around habitat to be retained.</u>	Pre-construction		
<u>BD12</u>	<u>A weed management procedure would be developed for the proposal to prevent and minimise the spread of weeds. This would include:</u> <ul style="list-style-type: none"> <u>Management protocol for declared priority weeds under the Biosecurity Act 2015 during and after construction.</u> <u>Weed hygiene protocol in relation to plant, machinery, and fill.</u> 	<u>C</u>	<u>O</u>	<u>D</u>

No.	Safeguards and mitigation measures	C	O	D
	<ul style="list-style-type: none"> Any occurrences of pathogens such as Myrtle Rust and Phytophthora would be monitored, treated, and reported. <p>The weed management procedure would be incorporated into the Biodiversity Management Plan.</p>			
BD13	<p>Staff training and site briefing to communicate environmental features to be protected and measures to be implemented, including but not limited to:</p> <ul style="list-style-type: none"> Site induction. Toolbox talks. 	<u>C</u>	<u>O</u>	<u>D</u>
BD14	<p>Preparation of a Biodiversity Management Plan that would include protocols for:</p> <ul style="list-style-type: none"> Protection of native vegetation to be retained. Best practice removal and disposal of vegetation. Staged removal of hollow-bearing trees and other habitat features such as fallen logs with attendance by an ecologist. Weed management. Pest animal management Unexpected threatened species finds. Exclusion of vehicles through sensitive areas. Rehabilitation of disturbed areas. 	<u>C</u>		
BD15	<p>Screening and landscaping plantings (up to 50 m where practicable) to be comprised of local indigenous species representative of the vegetation in the development site.</p>	<u>C</u>	<u>O</u>	
BD16	<p>Install approximately 120 nesting boxes for birds and mammals across the development site.</p> <ul style="list-style-type: none"> Nesting boxes will be designed to meet the requirements of target species including Squirrel Gliders, bats, parrots and owls. Nesting boxes will be monitored periodically for use and/or replacement. 	<u>C</u>	<u>O</u>	
BD17	<p>10 retained dams would be planted with native riparian vegetation and transformed into small created wetlands for wildlife.</p>	<u>C</u>		
BD18	<p>Sediment barriers and spill management procedures would be implemented to control the quality of water runoff released from the site into the receiving environment including:</p> <ul style="list-style-type: none"> An erosion and sediment control plan would be prepared in conjunction with the final design and implemented. Spill management procedures would be implemented. 	<u>C</u>	<u>O</u>	<u>D</u>
BD19	<p>Staff training and site briefing to communicate impacts of traffic strikes on native fauna, including but not limited to:</p> <ul style="list-style-type: none"> Awareness training during site inductions regarding enforcing site speed limits. Site speed limits to be enforced to minimise fauna strike 	<u>C</u>	<u>O</u>	<u>D</u>
BD20	<p>Involve a local landcare group or educational institution in ongoing biodiversity monitoring and enhancement. and communicate outcomes with third parties to contribute knowledge of how biodiversity can be preserved on solar farms.</p>	<u>C</u>	<u>O</u>	
BD21	<p>Plain wire instead of barbed used on top of the perimeter fence and stock fencing to reduce impacts on birds and Squirrel Glider.</p>	<u>C</u>	<u>O</u>	

No.	Safeguards and mitigation measures	C	O	D
BD22	Perimeter fence location to avoid, where possible, segmenting patches of native vegetation to facilitate native fauna movements.	C	O	
BD23	All staff induction and regular communications to cover environmental features retained and protection measures to be implemented (including but not limited to): <ul style="list-style-type: none"> Retained dams, trees and vegetation communities. Site speed limits to be enforced to minimise fauna strike. Vehicle hygiene and biosecurity. 	C	O	
BD6	Clearing protocols that identify vegetation to be retained, prevent inadvertent damage and reduce soil disturbance where partial clearing is proposed: <ul style="list-style-type: none"> Approved clearing limits clearly delineated with temporary fencing prior to construction commencing. No stockpiling or storage within dripline of retained trees. In areas to clear adjacent to areas to be retained, chainsaws would be used rather than heavy machinery to minimise risk of unauthorised disturbance. Remove native vegetation by chainsaw rather than heavy machinery. 	C		
BD7	Noise barriers or daily/seasonal timing of construction and operational activities to reduce impacts of noise. Construction Environmental Management Plan would include measures to avoid noise encroachment on adjacent habitats such as avoiding night works as much as possible.	C	O	
BD10	Hygiene protocols to prevent the spread of weeds or pathogens between infected areas and uninfected areas incorporated into the Pest and Weed Management Plan.	C	O	
BD12	Preparation of a Biodiversity Management Plan to implement biodiversity protection measures (including but not limited to): <ul style="list-style-type: none"> Retaining habitat features (e.g. hollow logs) where feasible. Staged removal of hollow bearing trees and other habitat features with attendance by an ecologist. Unexpected threatened species finds. Rehabilitation and enhancement of disturbed areas. 	C		
Aboriginal heritage				
AH1	The proponent should prepare a Cultural Heritage Management Plan (CHMP) to address the potential for finding additional Aboriginal artefacts during the construction of the Solar Farm and management of known sites and artefacts. The CHMP should include the unexpected finds procedure to deal with construction activity. Preparation of the CHMP should be undertaken in consultation with the registered Aboriginal parties.	C		
AH2	In the unlikely event that human remains are discovered during the construction, all work must cease in the immediate vicinity. BCD, the local police and the registered Aboriginal parties should be notified. Further assessment would be undertaken to determine if the remains were Aboriginal or non-Aboriginal.	C		
AH3	<u>The development must avoid the two possible Scarred Trees (Walla Solar Farm 495495 and Walla Solar Farm 497946). A minimum 10 m buffer, marked which a physical barrier such as fencing, around each tree should be in place to protect the trees canopy and root system.</u>	C		

No.	Safeguards and mitigation measures	C	O	D
AH4	If complete avoidance of the 23 isolated find sites and 11 artefact scatters recorded within the proposal area is not possible, the artefacts within the development footprint must be salvaged prior to the proposed work commencing and moved to a safe area within the property that would not be subject to any ground disturbance.	Pre-construction		
AH5	The collection and relocation of the artefacts should be undertaken by an archaeologist with representatives of the registered Aboriginal parties and be consistent with Requirement 26 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales. A new site card/s would need to be completed once the artefacts are moved to record their new location on the AHIMS database.	Pre-construction		
AH6	A minimum 5 m buffer should be observed around all artefact scatters and isolated find sites that cannot be avoided, including those outside the development footprint.	C		
AH7	Further archaeological assessment would be required if the proposal activity extends beyond the area assessed as detailed in this report. This would include consultation with the registered Aboriginal parties and may include further field survey.	C		
Air quality				
AQ1	Construction transport route to the development site to maximise use of sealed roads.	C		
AQ2	Primary construction access point located in north eastern corner of the development site away from residential buildings.	C		
AQ3	Development of a complaints procedure to promptly identify and respond to issues generating complaints.	C	O	D
AQ4	Protocols to guide vehicle and construction equipment use, to minimise emissions would be included in construction and operational environmental management plans. This would include but not be limited to Australian standards and POEO Act requirements.	C	O	D
AQ5	During construction, operation and decommissioning, dust would be monitored and managed to prevent dust leaving the development site. This includes dust from stockpiled materials.	C	O	D
AQ6	Monitor local weather conditions and manage the site if any conditions will exacerbate air quality (e.g. wind).	C		
AQ7	Fires and material burning are prohibited on the development site.	C	O	D
Historic heritage				
HH1	Should an item of historic heritage be identified, the Heritage Division (DPIE) would be contacted prior to further work being carried out in the vicinity.	C	O	D
Soil				
SO1	A Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) would be prepared, implemented and monitored during the construction and decommissioning of the proposal, in accordance with Landcom (2004), to minimise soil (and water) impacts. The SWMP and ESCP would include provisions such as:	Prior to and during construction		D

No.	Safeguards and mitigation measures	C	O	D
	<ul style="list-style-type: none"> • At the commencement of the works, and progressively during construction, install the required erosion control and sediment capture measures. • Regularly inspect erosion and sediment controls, particularly following rainfall. • Maintain a register of inspection and maintenance of erosion control and sediment capture measures. • Ensure there are appropriate erosion and sediment control measures in place to prevent erosion and sedimentation occurring within the stormwater channel during concentrated flows. • Ensure that machinery arrives on site in a clean, washed condition, free of fluid leaks. • Ensure that machinery leaves the site in a clean condition to avoid tracking sediment onto public roads. • In all excavation activities, separate subsoils and topsoils and ensure that they are replaced in their natural configuration to assist revegetation. • During excavation, monitor for increases in salinity, reduce water inputs and remediate the site with salt tolerant vegetation. • Stockpile topsoil appropriately to minimise weed infestation, maintain soil organic matter, and maintain soil structure and microbial activity. • Manage works in consideration of heavy rainfall events. • Areas of disturbed soil would be rehabilitated promptly and progressively during construction. 			
SO2	<p>ESCP developed in consultation with a soil scientist and an agronomist would take into account soil survey results to ensure perennial grasscover is established across the site as soon as practicable after construction and maintained throughout the operation phase. The ESCP would cover:</p> <ul style="list-style-type: none"> • Soil restoration and preparation requirements. • Species election. • Soil preparation. • Establishment techniques. • Maintenance requirements. • Perennial groundcover targets, indicators, condition monitoring, reporting and evaluation arrangements: <ul style="list-style-type: none"> ○ Live grasscover would be maintained at or above 70% at all times to protect soils, landscape function and water quality. ○ Any grazing stock would be removed from the site when cover falls below this level. ○ Grasscover would be monitored on a fortnightly basis using an accepted methodology. • Contingency measures to respond to declining soil or groundcover condition. • Identification of baseline conditions for rehabilitation following decommissioning. 	Prior to construction		
SO3	<p>The array would be designed to allow sufficient space (8 m to 14 m) between panels to establish and maintain groundcover beneath the panels and facilitate weed control.</p>	Design		

No.	Safeguards and mitigation measures	C	O	D
SO4	A comprehensive Fire Management and Emergency Response Plan (FMERP) would be developed for the site and specifically address foreseeable on-site and off-site emergency incidents. The FMERP would detail appropriate risk control measures to safely mitigate potential risk to soil, health and safety of firefighters and first responders in the case of a hazardous spill.	C	O	D
SO5	A FMERP would be developed and implemented during construction, operation and decommissioning to prevent contaminants affecting adjacent surrounding environments. The FMERP would include spill and contamination responses to: <ul style="list-style-type: none"> • Manage the storage of any potential contaminants onsite. • Mitigate the effects of soil contamination by fuels or other chemicals (including emergency response and EPA notification procedures and remediation). A protocol would be developed in relation to discovering buried contaminants within the development site (e.g. pesticide containers, if any). It would include stop work, remediation and disposal requirements.	C	O	D
SO6	Any area temporarily used during construction (laydown and trailer complex areas) would be restored to original condition or re-vegetated with native plants.	C	O	D
SO7	Best practice management measures should be employed where applicable to reduce the risk of erosion and sedimentation control: <ul style="list-style-type: none"> • Preserve and stabilise disturbed areas, drainageways and steep slopes. • Minimise the extent and duration of disturbance. • Install perimeter controls. • Employ the use of sediment control measures to prevent off- and on-site damage. Inspect and maintain sediment and erosion control measures regularly. • Control stormwater flows onto, through and from the site in stable drainage structures. Protect inlets, storm drain outlets and culverts. Provide access and general construction controls.	C	O	D
Hazards (EMFs, fire)				
HA1	Dangerous or hazardous materials would be transported, stored and handled in accordance with AS1940-2004: <i>The storage and handling of flammable and combustible liquids</i> , and the Australian Dangerous Goods Code (ADG Code) where relevant. All potential pollutants kept on-site would be stored in accordance with relevant HAZMAT requirements and banded.	C	O	D
HA2	All design and engineering would be undertaken by qualified competent persons with the support of specialists as required.	C		
HA3	All electrical equipment would be designed in accordance with relevant codes and industry best practice standards in Australia.	C		
HA4	Design of electrical infrastructure to minimise EMFs through the solar array (underground).	C		
HA5	<u>Bushfire Preparedness (construction)</u> <ul style="list-style-type: none"> • All workers, subcontractors and visitors will be inducted to ensure they are aware of their responsibilities relating to fire safety. 	C	O	D

No.	Safeguards and mitigation measures	C	O	D
	<ul style="list-style-type: none"> • Designated emergency management personnel will be trained according to their level of responsibility (First Aiders, Fire Wardens). • Contractors will comply with the restrictions applied during Fire Danger Period and Total Fire Bans. No hot works such as grinding and welding will be performed during Total Fire Bans without the appropriate permit. • Adequate firefighting equipment (e.g. extinguishers and water trucks) should be available across the site to quickly manage any fire. • All firefighting equipment will be in accordance with relevant fire safety standards and will be inspected on a regular basis and replaced after use or where faulty. • Handle and store dangerous and flammable goods in accordance with the measures outlined in the Code of Practice for the Storage and Handling of Workplace Dangerous Goods (2013). • As far as practicable, vehicles will move around site using designated roads and tracks and must not park on or drive in long grass or off road. • Diesel vehicles are to be used where practicable. The use of petrol-powered vehicles should be restricted, unless inspected and risk assessed by the Head Contractor. Petrol vehicles should not be used for off road or be parked off road with the engine running. • No burning of waste or construction materials on site. • Smoking will only be permitted in designated smoking areas. 			
HA6	<p>A FMERP would be developed and implemented during construction, operation and decommissioning, with input from the local RFS centre, and include but not be limited to:</p> <ul style="list-style-type: none"> • Operational procedures relating to mitigation and suppression of bush fire relevant to the solar farm. • Addressing foreseeable on-site and off-site fire events or other emergency incidents. • Detailing appropriate risk control measures that would need to be implemented to safely mitigate potential risk to the health and safety of firefighters and other first responders. • Such measures will include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures to be instigated, minimum evacuation zone distances and a safe method of shutting down and isolating the PV system (either in its entirety or partially, as determined by risk assessment). • Other risk control measures that may need to be implemented in a fire emergency due to any unique hazards specific to the site. • Management of activities with a risk of fire ignition. • Management of fuel loads onsite. • Storage and maintenance of firefighting equipment, including siting and provision of adequate water supplies for bush fire suppression. • 24-hour emergency contact details including alternative telephone contact. • Site infrastructure plan. • Firefighting water supply plan. • Site access and internal road plan. 	C	O	D

No.	Safeguards and mitigation measures	C	O	D
	<ul style="list-style-type: none"> Construction of asset protection zones, fire trails, access for firefighting and on-site suppression equipment and their continued maintenance. Location of hazards (physical, chemical and electrical) that will impact on the firefighting operations and procedures to manage identified hazards during the firefighting operations. Such additional matters as required by the NSW RFS District Office. The below requirements of Planning for Bush Fire Protection 2006: <ul style="list-style-type: none"> Identifying asset protection zones. Providing adequate egress/access to the site. Emergency evacuation measures. <p>Two copies of the FMERP will be stored in a prominent location in a position directly adjacent to the main entry point.</p>			
HA7	To allow for emergency service personnel to undertake property protection activities, a 10 m defendable space managed as an APZ shall be provided around the buildings, switching station, BESS units, outside perimeter of the solar array, and all areas of unmanaged vegetation being retained within the site.	C	O	D
HA8	Six 20,000 L water supply (tanks) fitted with 65 mm Stortz fittings shall be located at each fire gate access point. These would be located at the main site entrance, the entrance to the sub-station, and the site entrance along Schneiders Road – two at each location (cumulative volume of 40,000 L at each access point).	C	O	D
HA9	Once constructed and prior to operation, the operator of the facility will contact the relevant local emergency management committee (LEMC).	C	O	
HA10	<p>All chemicals and fuels used on-site must be stored and handled in accordance with:</p> <ul style="list-style-type: none"> The requirements of all relevant Australian Standards. The NSW EPA’s Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids. <p>In the event of an inconsistency, the most stringent requirement must prevail to the extent of the inconsistency.</p>	C	O	D
HA11	<u>A safety management study, in accordance with Australian Standards (AS) 2885 for Pipelines – Gas and Liquid Petroleum, would be completed prior to construction commencing.</u>	Pre-construction		
HA12	<u>The proponent would complete an electrical hazard study in accordance with AS 4853-2012 prior to construction addressing low frequency induction and earth potential rise. Any relevant requirements, recommendations and/or actions would be implemented to the satisfaction of APA.</u>	Pre-construction		
HA13	<u>An electrical interference study would be completed once the detailed design is complete in accordance with the requirements of AS 2832.</u>	Pre-construction		
HA14	<u>During construction, the boundary of the gas pipeline easement would be clearly delineated by temporary fencing (or other means as agreed by APA), and clearly marked as a hazardous work zone/restricted area.</u>	C		

No.	Safeguards and mitigation measures	C	O	D
<u>Waste management</u>				
WM1	<p>A Waste Management Plan (WMP) would be developed and implemented during construction, operation and decommissioning to minimise wastes. It would include but not be limited to:</p> <ul style="list-style-type: none"> • Identification of opportunities to avoid, reuse and recycle, in accordance with the waste hierarchy. • Quantification and classification of all waste streams. • Provision for recycling management onsite. • Provision of toilet facilities for onsite workers and how sewage would be disposed of (i.e., pump out to local sewage treatment plant). • Tracking of all waste leaving the site. • Disposal of waste at facilities permitted to accept the waste. • Requirements for hauling waste (such as covered loads). 	C	O	D

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APPENDIX A BDAR VERSION 2

APPENDIX B LANDSCAPE PLAN VERSION 2






WALLA WALLA SOLAR FARM

BENAMBRA ROAD – WALLA WALLA

KEY

- 1 Southern Vegetation Buffer – 50m width x 1100m length = 55,000m² (5.5 Ha)
- 2 Eastern Vegetation Buffer – 5m width x 1000m length = 5,000m² (0.5 Ha)
- 3 Construction Compound, O&M Area and Main Site Entrance
- 4 Water Pipeline – 10m easement
- 5 Northern Vegetation Buffer – 50m width x 560m length = 28,000m² (2.8 Ha)
- 6 High Pressure Gas Pipeline Easement (24m) – no works to occur without prior authorisation of the pipeline operator
- 7 Transgrid Access
- 8 Transgrid Substation
- 9 Northwest Vegetation Buffer I – 50m width x 244m length = 12,200m² (1.22 Ha)
- 10 Overhead Transmission Line – 60m easement
- 11 Northwest Vegetation Buffer II – 10m width x 465 length = 4,650m² (0.465 Ha)
- 12 Access Crossing – Schneiders Road North
- 13 Access Crossing – Schneiders Road South
- 14 Creek Crossing Point
- 15 Inverter Exclusion Zone – 400m radius
- 16 Northwest Vegetation Buffer III – Eastern block – 5m width x 286 length = 1,430m² (0.143 Ha) Western block – 5m width x 592 length = 2,690m² (0.296 Ha)
- 17 Creek Cable Crossing
- 18 Distance to Eastern Boundary – 30m
- 19 Back Creek – 30m buffer either side of the drainage line
- 20 Middle Creek – 20m buffer either side of the drainage line
- 21 R5a Setback – 1.2km Radius
- 22 Retained cropping land
- 23 5m wide cropping access track



-  Existing vegetation to be retained
-  Proposed native vegetation buffer
-  PV Array / Roads
-  Asset Protection Zone (APZ) / Fire break – 10m width
-  Retained Dam

WALLA WALLA SOLAR FARM

BENAMBRA ROAD – WALLA WALLA

KEY

- 1** Southern Vegetation Buffer – 50m width x 1100m length = 55,000m² (5.5 Ha)
- 2** Eastern Vegetation Buffer – 5m width x 1000m length = 5,000m² (0.5 Ha)
- 18** Distance to Eastern Boundary – 30m
- 21** R5a Setback – 1.2km Radius
- 22** Retained cropping land
- 23** 5m wide cropping access track

50m wide revegetation area along southern boundary comprising a variety of indigenous tree, shrub, grasses and ground cover species to provide layered vegetation for visual amenity and habitat

Development Exclusion Zone

Asset Protection Zone / Fire break – 10m wide

Large evergreen trees e.g.
Eucalyptus blakelyi (Blakely's Red Gum)
Eucalyptus melliodora (Yellow Box)
Eucalyptus polyanthemos (Red Box)

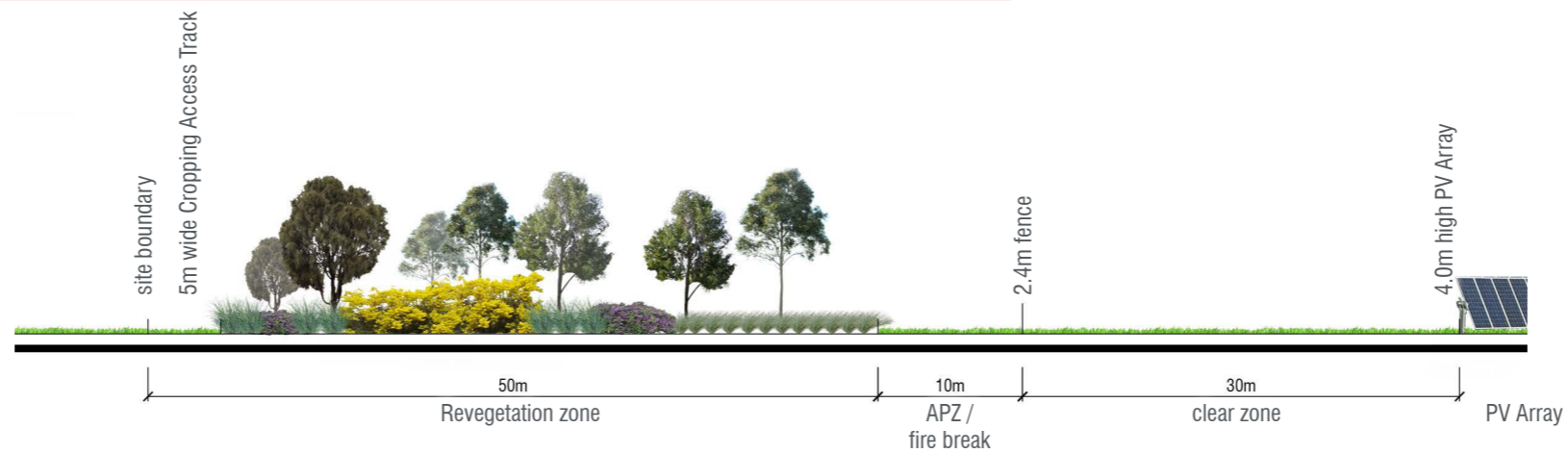
Medium evergreen trees e.g.
Acacia dealbata (Silver Wattle)
Acacia implexa (Lightwood)
Allocasuarina luehmannii (Bulloak)
Allocasuarina verticillata (Drooping Sheoak)

Shrubs and groundcovers e.g.
Acacia acinacea (Gold-dust Wattle)
Acacia rubida (Red-stemmed Wattle)
Bursaria spinosa (Sweet Bursaria)
Dodonea viscosa subsp. *angustissima* (Narrow-leaf Hop-bush)



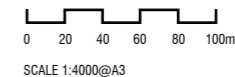
PLAN 1:4000

- Existing vegetation to be retained
- Proposed native vegetation buffer
- PV Array
- Asset Protection Zone (APZ) / Fire break – 10m width



SECTION 1:500 @ A3 Section graphical illustration indicative growth 5 – 8 years

DRG NO.	REV	DATE	DES/DOC	AUTH	AMENDMENT
306840 LC02	I	23/03/2020	SME	MS	REVISED LAYOUT



WALLA WALLA SOLAR FARM

BENAMBRA ROAD – WALLA WALLA

KEY

5 Northern Vegetation Buffer – 50m width x 560m length = 28,000m² (2.8 Ha)

15 Inverter Exclusion Zone – 400m radius






50m wide revegetation area along northern boundary comprising a variety of indigenous tree, shrub, grasses and ground cover species to provide layered vegetation for visual amenity and habitat

Large evergreen trees e.g.
Eucalyptus blakelyi (Blakely's Red Gum)
Eucalyptus melliodora (Yellow Box)
Eucalyptus polyanthemos (Red Box)

Medium evergreen trees e.g.
Acacia dealbata (Silver Wattle)
Acacia implexa (Lightwood)
Allocasuarina luehmannii (Bulloak)
Allocasuarina verticillata (Drooping Sheoak)

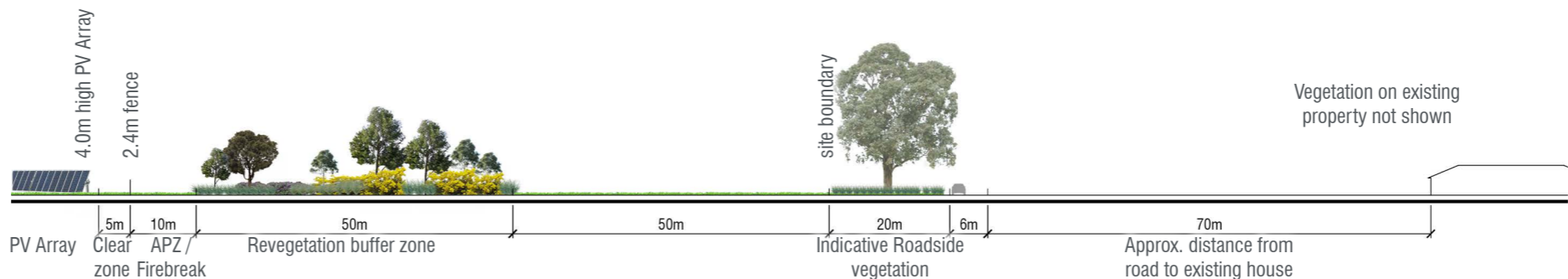
Shrubs and groundcovers e.g.
Acacia acinacea (Gold-dust Wattle)
Acacia rubida (Red-stemmed Wattle)
Bursaria spinosa (Sweet Bursaria)
Dodonea viscosa subsp. *angustissima* (Narrow-leaf Hop-bush)

Asset Protection Zone / Firebreak – 10m wide

-  Existing vegetation to be retained
-  Proposed native vegetation buffer
-  PV Array
-  Asset Protection Zone (APZ) / Fire break – 10m width
-  Retained Dam



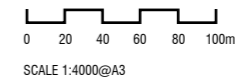
PLAN 1:4000



SECTION 1:1000 @ A3

Section graphical illustration indicative growth 5 – 8 years

DRG NO.	REV	DATE	DES/DOC	AUTH	AMENDMENT
306840 LC03	I	23/03/2020	SME	MS	REVISED LAYOUT

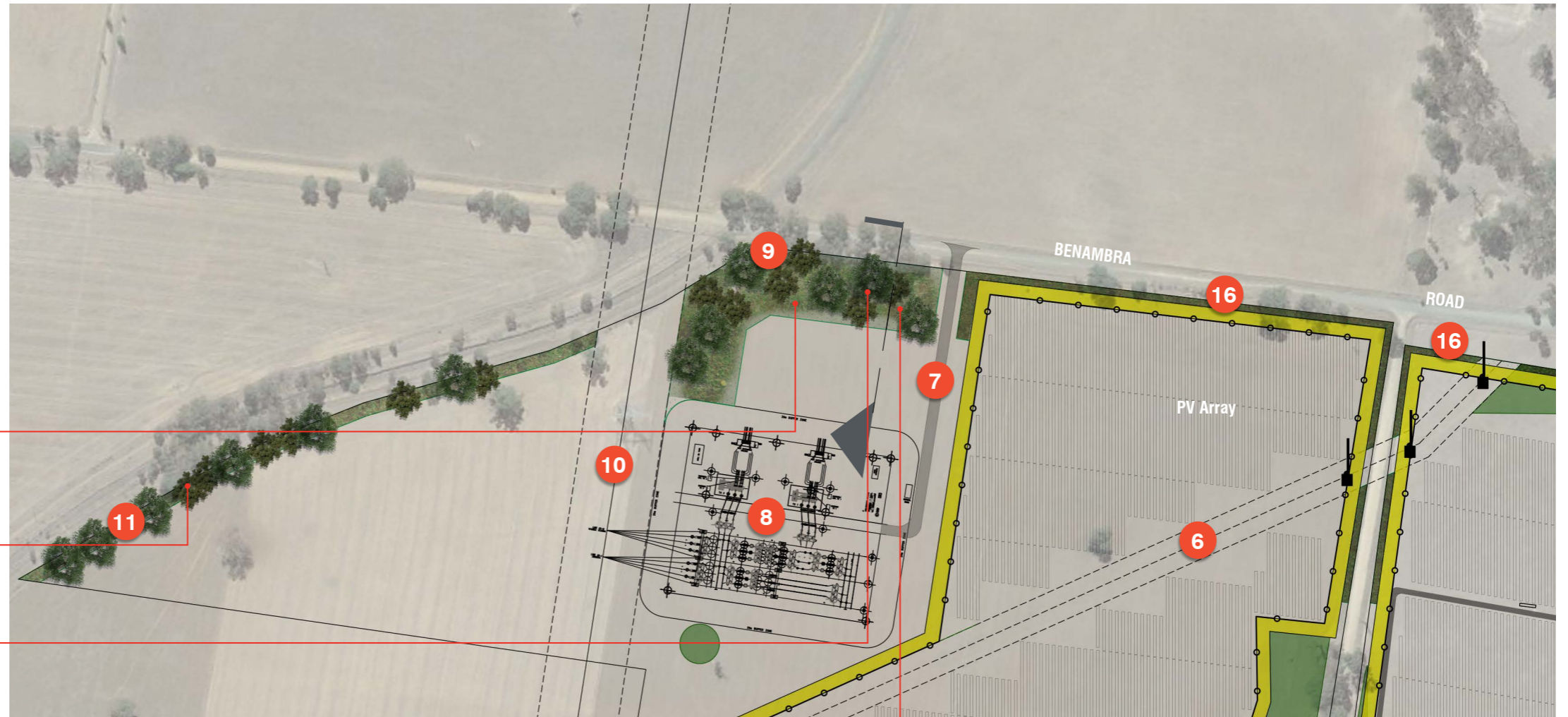


WALLA WALLA SOLAR FARM

BENAMBRA ROAD – WALLA WALLA

KEY

- 6** High Pressure Gas Pipeline Easement (24m) – no works to occur without prior authorisation of the pipeline operator
 - 7** Transgrid Access
 - 8** Transgrid Substation
 - 9** Northwest Vegetation Buffer I – 50m width x 244m length = 12,200m² (1.22 Ha)
 - 10** Overhead Transmission Line
 - 11** Northwest Vegetation Buffer II – 10m width x 465 length = 4,650m² (0.465 Ha)
 - 16** Northwest Vegetation Buffer III – Eastern block – 5m width x 286 length = 1,430m² (0.143 Ha)
Western block – 5m width x 592 length = 2,690m² (0.296 Ha)
Revegetation area along northern boundary comprising a variety of indigenous tree, shrub, grasses and ground cover species to provide layered vegetation for visual amenity and habitat
- Medium evergreen trees e.g.
Acacia dealbata (Silver Wattle)
Acacia implexa (Lightwood)
Allocasuarina luehmannii (Bulloak)
Allocasuarina verticillata (Drooping Sheoak)
- Large evergreen trees e.g.
Eucalyptus blakelyi (Blakely's Red Gum)
Eucalyptus melliodora (Yellow Box)
Eucalyptus polyanthemos (Red Box)
- Shrubs and groundcovers e.g.
Acacia acinacea (Gold-dust Wattle)
Acacia rubida (Red-stemmed Wattle)
Bursaria spinosa (Sweet Bursaria)
Dodonea viscosa subsp. *angustissima* (Narrow-leaf Hop-bush)



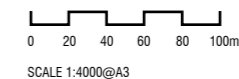
PLAN 1:4000

- Existing vegetation to be retained
- Proposed native vegetation buffer
- PV Array
- Asset Protection Zone (APZ) / Fire break – 10m width



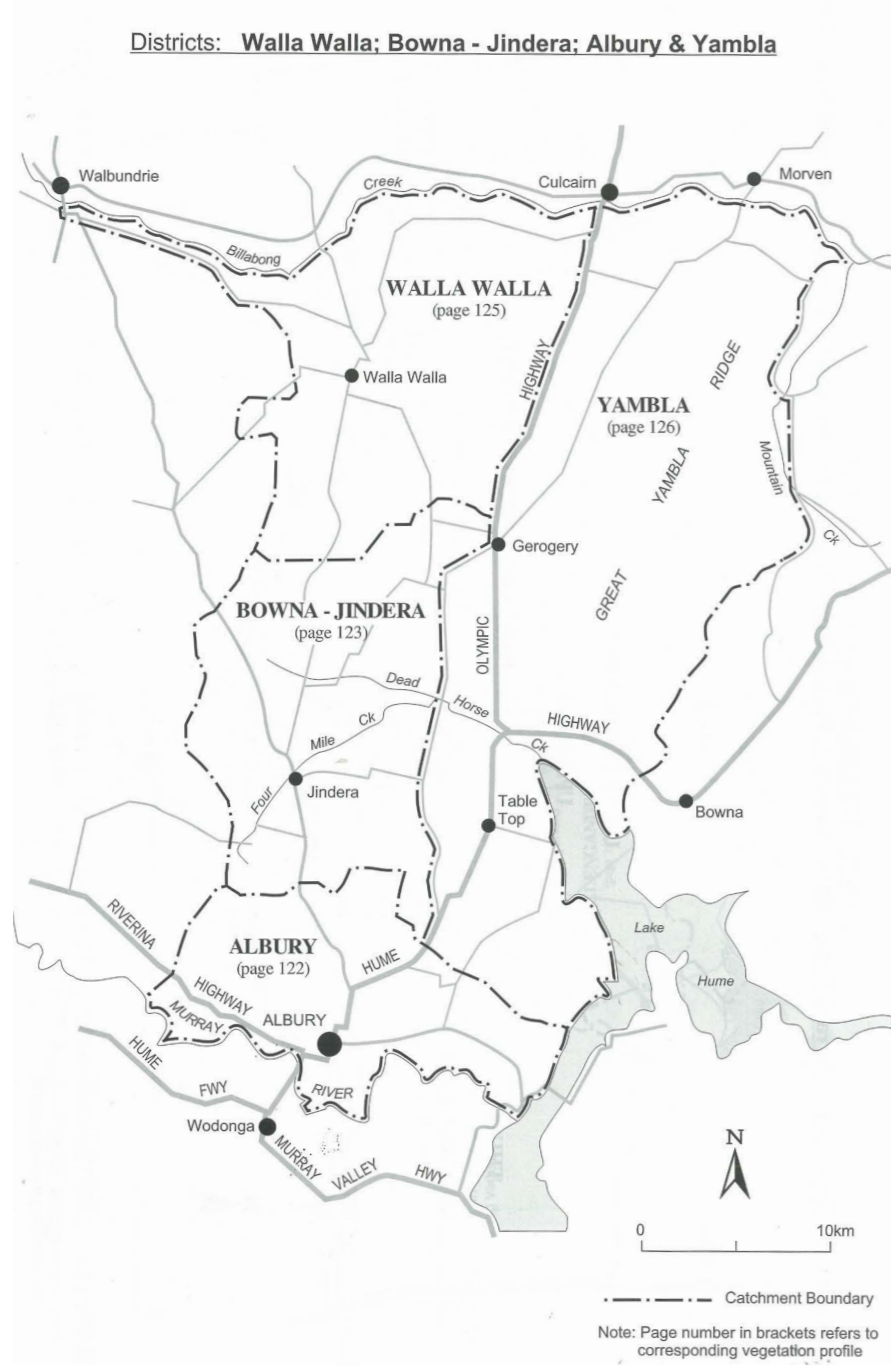
SECTION 1:500 @ A3 Section graphical illustration indicative growth 5 – 8 years

DRG NO.	REV	DATE	DES/DOC	AUTH	AMENDMENT
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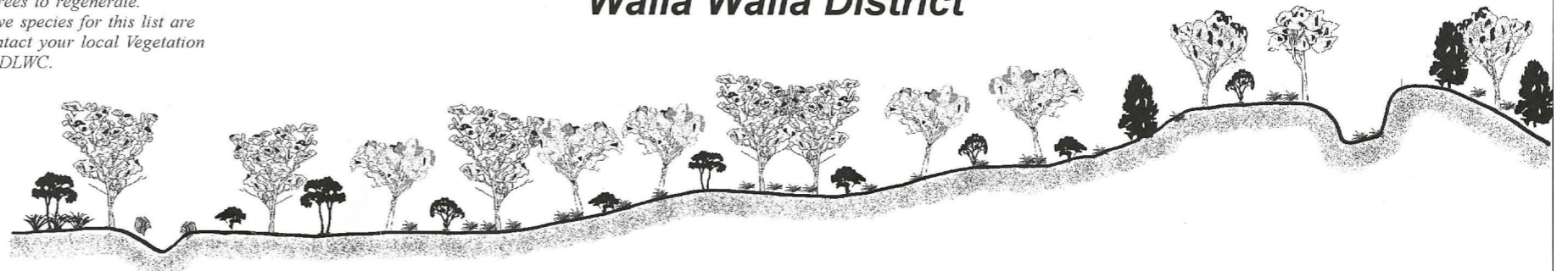
WALLA WALLA SOLAR FARM

BENAMBRA ROAD – WALLA WALLA



Note: For general re-planting (creeksides; windbreaks etc.), select 50% trees and at least 50% shrubs. If enhancing sites with remnant trees, select shrubs only and allow trees to regenerate. Additions of locally native species for this list are gratefully accepted. Contact your local Vegetation Management Officer at DLWC.

General Native Vegetation Profile: Walla Walla District



LANDFORM	Flats and low country	Rising country & gently undulating hills	Rocky outcrop			
VEGETATION TYPE	Box woodland - Yellow Box & Grey Box. Blakely's Red Gum woodland.	White Box woodland	Dwyer's Red Gum woodland with Currawang & Long-leaf Box; Red Stringybark dry forest.			
GEOLOGY & SOILS	Riverine deposits of clay, silt, sand & gravel. Alluvial loams & grey & brown clays.	Mainly residual & colluvial deposits from underlying granite. Red and yellow earths.	Residual and colluvial deposits from underlying granite. Sandy granite soils.			
LOCATION EXAMPLE	Creeklane country: Billabong; Petries; Back & Middle.	Rising country SE of Walla Walla	Stringybark Hill (NW of Gerogery)			
TREES > 8 m	<i>Acacia dealbata</i> <i>Allocasuarina luehmannii</i> <i>Eucalyptus albens</i> <i>E. blakelyi</i> + <i>E. bridgesiana</i> + <i>E. camaldulensis</i> <i>E. melliodora</i> <i>E. microcarpa</i> + creeklines	Silver Wattle Bulloak White Box Blakely's Red Gum Apple Box River Red Gum Yellow Box Grey Box	<i>Acacia dealbata</i> <i>A. implexa</i> <i>Acacia penninervis</i> <i>Brachychiton populneus</i> <i>Callitris glaucophylla</i> <i>Eucalyptus albens</i> <i>E. blakelyi</i> <i>E. dwyeri</i> <i>E. melliodora</i> <i>E. microcarpa</i> <i>E. polyanthemus</i> <i>Hakea tephrosperma</i> <i>Pittosporum angustifolium</i>	Silver Wattle Hickory Wattle/Lightwood Hickory Wattle Kurrajong White Cypress Pine White Box Blakely's Red Gum Dwyer's Red Gum Yellow Box Grey Box Red Box Hooked Needlewood Butterbush	<i>Acacia doratoxylon</i> <i>A. implexa</i> <i>Allocasuarina verticillata</i> <i>Brachychiton populneus</i> <i>Callitris endlicheri</i> <i>C. glaucophylla</i> * <i>Eucalyptus albens</i> * <i>E. blakelyi</i> <i>E. dwyeri</i> <i>E. goniocalyx</i> # <i>E. macrorhyncha</i> <i>E. nortonii</i> * <i>E. polyanthemus</i> <i>Exocarpos cupressiformis</i> * Mainly slopes of rocky outcrop # Mainly SE aspect	Currawang Hickory Wattle Drooping Sheoak Kurrajong Black Cypress Pine White Cypress Pine White Box Blakely's Red Gum Dwyer's Red Gum Long-leaf Box Red Stringybark Silver Bundy Red Box Native Cherry
SHRUBS 1.5 - 8 m	<i>Acacia acinacea</i> <i>A. montana</i> <i>A. paradoxa</i> <i>A. pycnantha</i> <i>Bursaria spinosa</i> + <i>Callistemon sieberi</i> <i>Eutaxia microphylla</i> + Billabong Creek	Gold-dust Wattle Mallee Wattle Kangaroo Thorn Golden Wattle Sweet Bursaria River Bottlebrush Mallee Bush Pea	<i>Acacia acinacea</i> <i>A. montana</i> <i>A. pycnantha</i> <i>A. rubida</i> <i>Bursaria spinosa</i> <i>Eutaxia microphylla</i> <i>Indigofera adesmiifolia</i>	Gold-dust Wattle Mallee Wattle Golden Wattle Red-stemmed Wattle Sweet Bursaria Mallee Bush Pea Tick Indigo	<i>Acacia rubida</i> <i>A. verniciflua</i> <i>Correa glabra</i> <i>C. reflexa</i> subsp. <i>reflexa</i> <i>Dillwynia</i> spp. <i>Dodonaea viscosa</i> subsp. <i>angustissima</i> <i>Indigofera australis</i> <i>Pultenaea cunninghamii</i>	Red-stemmed Wattle Varnish Wattle Rock Correa Common Correa Parrot-pea Narrow-leaf Hop-bush Austral Indigo Grey Bush-pea
GROUND COVERS	<i>Austrostipa</i> spp. - Spear Grass <i>Bothriochloa macra</i> - Red-leg Grass <i>Calotis cuneifolia</i> - Purple Burr-daisy <i>Carex</i> spp. - Sedge <i>Danthonia</i> spp. - Wallaby Grass <i>Dianella revoluta</i> - Spreading Flax-lily <i>Geranium</i> spp. - Cranesbill <i>Lomandra filiformis</i> - Wattle Mat-rush <i>Microlaena stipoides</i> - Weeping Grass	+ <i>Phragmites australis</i> - Common Reed <i>Poa</i> spp. - Tussock Grass <i>Sclerolaena muricata</i> var. <i>semiglabra</i> - Black Roly Poly <i>Themeda triandra</i> - Kangaroo Grass + <i>Typha</i> spp. - Cumbungi + creeklines/soaks/poorly drained sites	<i>Arthropodium</i> spp. <i>Austrostipa</i> spp. <i>Bothriochloa macra</i> <i>Bulbine bulbosa</i> <i>Burchardia umbellata</i> <i>Chloris truncata</i> <i>Danthonia</i> spp. <i>Dianella revoluta</i> <i>Elymus scaber</i>	Lily Spear Grass Red-leg Grass Bulbine Lily Milkmaids Windmill Grass Wallaby Grass Spreading Flax-lily Common Wheatgrass	<i>Glycine clandestina</i> <i>Hardenbergia violacea</i> <i>Hibbertia obtusifolia</i> <i>Isotoma axillaris</i> <i>Lomandra filiformis</i> <i>Pelargonium australe</i> <i>Pimelea curviflora</i> <i>Stypandra glauca</i> <i>Themeda triandra</i>	Twining Glycine Purple Coral Pea Grey Guinea-flower Rock Isotome Wattle Mat-rush Native Storksbill Curved Rice-flower Nodding Blue-lily Kangaroo Grass

Revegetation Species list copy from:
 South West Slopes Revegetation Guide
 Murray Catchment Management Committee and Department of Land & Water Conservation (1998)





APPENDIX C AMENDMENT REPORT

APPENDIX D CORRESPONDENCE

D.1 RIVERINA WATER COUNTY COUNCIL LETTER RE WATER ACCESS

RE: Walla solar farm

 Aran Beckett <abeckett@rwcc.nsw.gov.au>
To: Mark Love

 Reply  Reply All  Forward 
Mon 10/02/2020 1:28 PM

Hi Mark,

Apologies for the delay, but I have now received advice regarding the supply of water for the proposed solar farm in Walla Walla as we have previously discussed.

The land we discussed is known as 116 Schneiders Rd, Walla Walla, and is located to the south east of the Schneiders Rd and Benambra Rd intersection.

You mentioned an annual consumption for the operation of the solar farm of approx. 600kL per year, once constructed and fully operational. This demand should be able to be met via a standard connection off Riverina Waters existing infrastructure that runs through the property.

In regards to the large volume of water required during the construction phase of the project (approx. 25,000 kL over an 18 month period), Riverina Water has a filling station in Walla Walla that is accessible to the public for bulk water access. This filling station is available 24 hours a day, 7 days a week. An application must be made to Riverina Water and a small application fee paid. Then an electronic key will be issued which allows access to the filling station. The filling station is fitted with a camlock fitting that can be connected up to a suitably equipped water tanker. Water sourced from the filling station is charged monthly at a rate of \$3.24 per kilolitre.

Please let me know if any further information is required at this stage.

Kind Regards

Aran Beckett
Asset Officer



91 Hammond Ave (PO Box 456)
Wagga Wagga NSW 2650

Direct: 02 6922 0628



rwcc.nsw.gov.au

D.2 APA GROUP CORRESPONDENCE

From: PlanningNSW <planningnsw@apa.com.au>

Sent: Tuesday, 4 February 2020 4:21 PM

To: Cliona Gormley <cliona.gormley@frv.com>

Cc: Mark Love <mark.love@frv.com>

Subject: RE: APA | Walla Walla Solar Farm (300MW) – SSD-9874

Hi Cliona,

No worries, your welcome. Likewise, thanks for your time and Mark's on the phone earlier today.

As discussed, APA's Conditions of Approval will need to be complied with prior to the development commencing / at all times.

Post EIS approval by DPIE it would be ideal to organise a meeting to complete the internal APA SMS review together with FRV attendance (Condition 3) to ensure the land use risk and associated construction risks of the project are understood by yourselves as the Applicant in relation to APA's pipeline asset. This meeting will also enable discussion on compliance with all APA Conditions of Approval listed in the attached submission.

For Conditions 4-5 – Risk Assessment (4853-2012) / Electrical Interference Studies (AS2832), companies who can complete these studies include Power Earth Technologies and SafeEarth as suggestions. You could also get in contact with Anode Engineering and Corrosion Control Engineering to obtain relevant quotes.

Understand project timeline is still quite fluid, with engagement of construction contractor expected in 2021. Once EIS approval from DPIE has been obtained and grid connection from relevant Electricity Provider secured.

Look forward to working through APA's Conditions of Approval for this Project in the near future.

Any questions, feel free to give me a call.

Kind regards,

Ben Setchfield
Senior Urban Planner

D.3 BAM SUPPORT CORRESPONDENCE

From: [Denise Wallace](#) on behalf of [OEH ROD BAM Support Mailbox](#)
To: [Julie Gooding](#)
Subject: FW: BSM-258 Survey Submission Confirmation: Biodiversity Offsets Scheme enquiry form
Date: Thursday, 7 November 2019 2:50:21 PM

Hi Julie

Thank you for your enquiry. With regard to generating the offset requirement, you should only include those vegetation zones that are being impacted. Otherwise, you will be generating an offset obligation for those vegetation zones that occur outside the impacted area. However, you can still create another version of the same BAM-C assessment and include all surrounding vegetation zones for the purposes of determining a VI score and addressing Chapter 8 'avoid and minimise' of the BAM.

Kind regards,
The BAM Support Team

From: noreply@survey.environment.nsw.gov.au <noreply@survey.environment.nsw.gov.au>
Sent: Tuesday, 5 November 2019 12:39 PM
To: OEH ROD BAM Support Mailbox <bam.support@environment.nsw.gov.au>
Subject: Survey Submission Confirmation: Biodiversity Offsets Scheme enquiry form

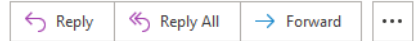
Survey Name:	Biodiversity Offsets Scheme enquiry form
Submitted On:	5/11/2019 12:39:03 PM
Q 1: Your enquiry relates to:	General enquiry
Q 2: What would you like to ask about?	Biodiversity Assessment Method Support (including BAM-C/BOAMS)
Q 3: Tell us more:	Hi, I had thought that only vegetation zones within the development footprint (impact area) would be added to the BAM Calculator for a BDAR, but I have heard otherwise that I should be adding all the vegetation zones in the development site including the ones that would not be impacted into the BAM Calculator. Can you please clarify which is the correct method. Kind regards, Julie

D.4 DPIE WATER AND NRAR CORRESPONDENCE

RE: Walla Walla Solar Farm enquiry



Tim Baker <tim.baker@dpi.e.nsw.gov.au>
To: Adam Oehlman
Cc: Bridgette Poulton



Mon 10/02/2020 12:24 PM

 You forwarded this message on 11/02/2020 12:37 PM.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Hi Alistair,

I can advise the following based on the information in Bridgette's email and photos, and NRAR's review for this project.

- In terms of stream order, both Back Creek and Middle Creek are fourth order watercourses. This is defined by the hydroline layer and is not something that can be interpreted.
- Both Back Creek and Middle Ck are waterfront land. For Middle Creek it is recognised there is limited channel definition in sections on the site. A key aspect for Middle Ck on the site is its role in maintaining connectivity with the upstream sections of Middle Ck and Back Creek, and its ability to convey flows and mitigate erosion both within the site and downstream.
- Based on the characteristics of Middle Ck on the site NRAR accepts a 20m buffer either side of the drainage line. Based on the characteristics of Back Ck, a 30m buffer either side of the drainage line is acceptable. There is the ability to encroach within the outer 15m of this buffer in sections if suitable offsets are applied as defined in the averaging rule of the, "Guidelines for controlled activities on waterfront land" which can be accessed at the below link:

https://www.industry.nsw.gov.au/_data/assets/pdf_file/0004/156865/NRAR-Guidelines-for-controlled-activities-on-waterfront-land-Riparian-corridors.pdf

Regards
Tim

D.5 JAYFIELDS NURSERY CORRESPONDENCE



Friday, February 14, 2020

Jayfields Nursery have been in contact with FRV Pty Ltd in respect of Native vegetation planting at the Walla Walla Solar Farm and we are also aware that they are liaising with Holbrook Landcare Network in respect of the species and planting regime to suit the local area.

Jayfields Nursery are a leading supplier of Native vegetation plants including Trees, shrubs and grasses and we supply to a wide variety of both Govt and private organisations including supplying plants for Commercial Forestry, Farm Forestry, Farm revegetation including shelter belts and erosion control, road projects, housing, commercial and renewable energy projects.

To provide an indication of the scale of our operations across NSW and Victoria during 2019/2020 we are supplying in excess of 4.5m trees to various projects and advised on several major projects in respect of the correct planting regime to ensure that plants we supply mature sufficiently and establish a good root ball system which leads to effective screening where required. I have attached our full profile document for your overview.

I am aware of the location of the Walla Walla Solar Farm and the characteristics of the native vegetation that will thrive if correctly planted across the area. I am also aware, and have worked closely with Holbrook Landcare Network, who also have a very solid understanding of what will grow effectively and what species suit the Walla Walla Solar Farm location and soil typology.

Jayfields Nursery have been helping customers successfully establish plants in varying landscapes for the past 30 years. It is our professional opinion that I am adamant that attempting to plant mature species would be futile and would not be the most effective and efficient use of native plants. Mature planting in our experience leads to a very high plant loss and results in much weaker growth pattern which is often not noticeable till 3-8 years down the track and particularly evident in high wind/storm events. We do not recommend this for any of our projects across NSW or Victoria.



180 Clifton Ring Road, PULLETOP NSW 2650 – PH: 02 6036 7235 – FAX: 02 6036 7254 ABN: 87 010 716 936



Our professional recommendation is that by correctly preparing the ground coupled with weed control & localised spraying and then followed by planting during the winter months (ideally mid July) will give our plants the best possible chance of success which will lead to an effective and healthy screen whilst also providing habitat and foraging areas for native birds and wildlife.

I can confirm that we have provided FRV with our detailed guidance sheets on best practise for ground preparation which I understand FRV will furnish to both the Landowners and any involved contractors.

I can provide further professional advice if required.

Kind regards

Kelly Glass
Jayfields Nursery



180 Clifton Ring Road, PULLETOP NSW 2650 – PH: 02 6036 7235 – FAX: 02 6036 7254 ABN: 87 010 716 936



Tree Planting Calendar

“Successful preparation is the key to successful planting”

SUMMER

ORDER TREES AND SHRUBS

- Order plants early to guarantee supply, December/January is best.
- Select species local to your area or ask **Jayfields Nursery** for advice on suitable species.

AUTUMN

RIP TREE LINES

- Rip before the Autumn break, while the ground is dry, and before ground becomes too wet preferably, to get deep shattering of the soil.
- Rip 4 metres apart at a minimum depth of 45cm.
- Don't rip under the drip-line of existing trees.
- Mound in wet areas.
- Break up large clods as they can cover phalaris plants thus reducing winter spray effectiveness.

SPRAYING

Before frost and 10 days after rain

- Spray any **couch grass** areas with *Glyphosate*.

One month after Autumn break when plants are actively growing

- Spray phalaris and/or cocksfoot, if present. These plants are very hard to kill so seek appropriate advice on sprays and rates.

WINTER

3-4 WEEKS MINIMUM - PRIOR TO PLANTING. Knock down weeds & apply residual herbicide to control competition throughout Spring.

- For normal annual weed and pasture species, spray with *Glyphosate*, plus a suitable residual herbicide. Adequate weed control is best achieved with the application of *Glyphosate* and a residual herbicide. *Glyphosate* alone will not achieve adequate weed control.
- *Simazine*, a residual herbicide, has been used extensively with great success in weed control in the past.
- NB. Plant back period on *Simazine* is minimum of 3 weeks.
- Please refer to product labels or a reputable chemical advisor for rate and use details.

BEFORE PLANTING

Control rabbits and hares

- Coordinate with neighbours if necessary.
- Avoid the need for labour-intensive and expensive tree guards.

One week prior to planting.

- Inspect rip lines for regrowth and respray if needed with *Glyphosate* only.

WINTER/SPRING

PLANT SEEDLINGS

- Plant mid July to mid September (depending on rainfall and soil type), but one month after spraying.
- Plant at least 4 x 4 metres apart, up to a maximum of 625 seedlings/ha

AFTER PLANTING

First week after planting

- Inspect for vermin or stock damage, or stock entry to plantation.

Regularly post-planting

- Check plants – make sure there are no weeds within half a metre of plants through Spring and early Summer.
- Watch regularly for grasshoppers, particularly in dry years – spray if causing damage. Use suitable methods to control, seek advice.

Weed control throughout the first Spring and into Summer is the single most important element affecting tree survival and growth.

180 Clifton Ring Road, PULLETOP N.S.W. 2650 Tel: 02 6036 7235 Fax: 02 6036 7254
Email: sales@jayfieldsnursery.com.au Web: www.jayfieldsnursery.com.au

D.6 LANDOWNER CORRESPONDENCE REGARDING LAND CAPABILITY



Landowner summary of existing agricultural practices

The two landowners who have agreed to lease part of their farms for the proposed Walla Walla Solar farm provided advice to the Department of Planning, Industry and Environment (DPIE) in February 2020 regarding the agricultural capability of their land in response to members of the public concerned about using highly productive land for purposes other than primary production.

Both landholders have confirmed that the portions of their farms, which they have agreed to lease to FRV for the proposed Walla Walla Solar Farm (Figure 1) are not highly productive or suitable for regular cropping. Both landowners have confirmed that this land has previously been used for grazing livestock, which would continue under their lease agreements with FRV.

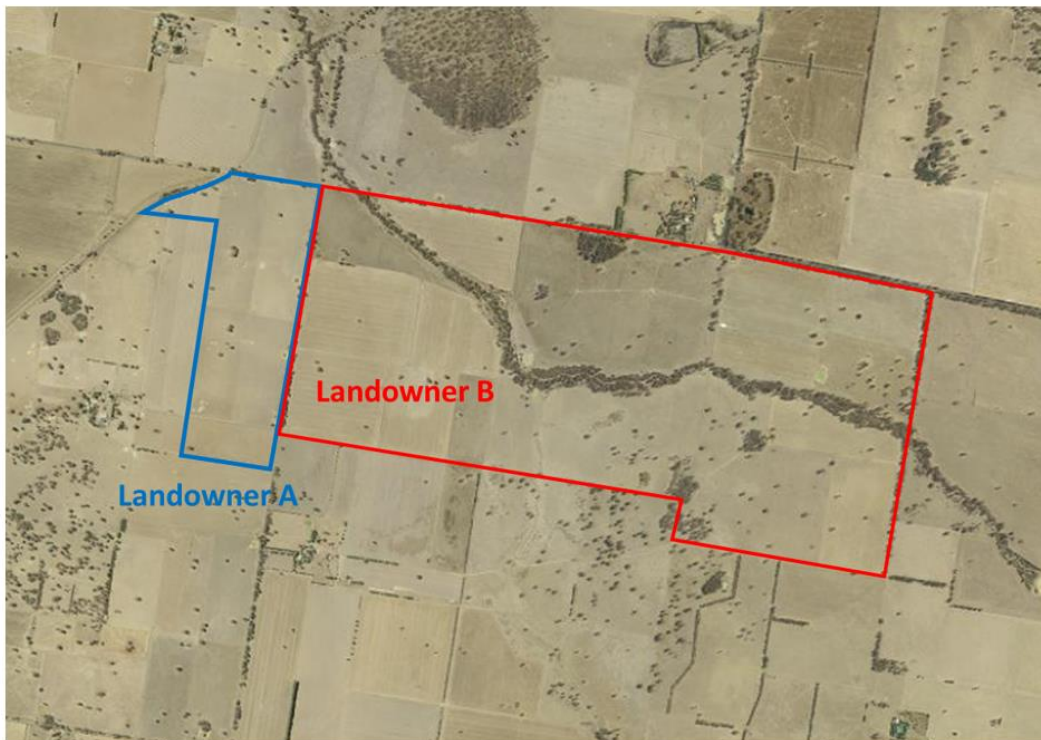


Figure 1 Ownership of land to be leased for the proposed Walla Walla Solar Farm



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D.7 NEAR NEIGHBOUR CORRESPONDENCE – CONFIDENTIAL

D.8 WALLA WALLA SOLAR FARM – FAQ

Walla Walla Solar Farm

FREQUENTLY ASKED QUESTIONS



Powering a Sustainable Future

GENERAL

Q What is proposed?

A FRV is proposing to construct and operate a 300 megawatt (MWac) solar farm for the purposes of providing a critical new source of clean energy for NSW. If approved, the solar farm will be capable of supplying 90,000 homes across the State and will reduce carbon emissions by more than 520,000 tonnes per year.

Q Who is FRV?

A FRV is an experienced and capable renewable energy developer and has developed over 2 gigawatts (GW) of renewable energy globally. FRV was the first company in Australia to deliver a project-financed solar farm; the Royalla Solar Farm near Canberra. FRV is also responsible for the Moree Solar Farm, the first solar farm in Australia using single axis tracking. FRV has four solar farms in operation across Australia with a further two projects currently in construction in NSW and VIC, along with multiple other projects under development.

Q What stage is this project at?

A Public Exhibition of the Project's *Environmental Impact Statement (EIS)* occurred from 1st November 2019 to 2nd December 2019, allowing both the local and wider community, along with Government agencies to review and make comment on FRV's concept for the Walla Walla Solar Farm. FRV has now completed a detailed review of all submissions and submitted its *Response to Submissions* Report. The Independent Planning Commission (IPC) will now be the Approval Authority for this project and will make a detailed assessment of the proposal, prior to determination.

Q Where will this project connect to?

A The project will connect to the existing 330kV transmission line, which is owned and operated by the transmission provider, TransGrid. This power line runs parallel with the western boundary of the project (west of Schneiders Road).

Q When will construction commence and for how long?

A The construction start date is dependent on a variety of factors, including obtaining a Development Application Approval, a Grid Connection Agreement, a Power Purchase Agreement and Financial Close. If all aspects are achieved, FRV anticipates construction could commence Q1 2021. Construction is expected to take between 16-20 months.

Q Will FRV stay on as the project owner?

A Our approach is to develop and acquire large-scale solar energy projects that we can then own and operate for the long-term. FRV have sold assets in the past but our core business model is to retain assets as this provides us with a sustainable return on investment and ensures we manage the running of our solar farms directly. For us, it is important that our assets are operated responsibly and perform well over their lifetime.

Q How long will this project operate for?

A The operational life of the project is expected to be 30 years. After this time, the site will either be rehabilitated and returned to its original purpose as freehold land or depending on future energy requirements the project may be reutilised, subject to landowner agreements and planning approvals.

DESIGN CONSIDERATIONS

Q Why has this specific site been chosen?

A Solar developers consider a long list of ‘conditions’ when choosing an appropriate site. These key conditions help narrow the search to specific geographical areas. One of the main factors is economical and low-impact access to the high voltage electricity grid network.

Typically, a developer will follow the following steps;

1. Identify parts of the electricity network with available capacity and near a growing customer base;
2. Identify land along this part of the network;
3. Review the suitability of this land – including protected ecology areas, cultural sensitivity, steep terrain etc.;
4. Define combinations of suitable land parcels that provide enough land area to make a project viable; and
5. Approach landowners of suitable land -landowners to secure access to larger, continuous land parcels.

Most suitable sites will present some degree of restrictions such as creek lines, easements, etc. FRV works to incorporate these restrictions so that they can co-exist alongside the solar farm footprint. FRV have developed projects across Australia with similar restrictions to those on the proposed Walla Walla Solar Farm site.

Q What about loss of agricultural land?

1. FRV have calculated all the infrastructure and vegetation buffers which are proposed as part of this project. Results highlight that more than 85% of the project area will remain for agricultural purposes, in particular, sheep grazing. Suitable grasses will be sown allowing for the continued grazing by Landholders' stock (sheep) and/or the production of grazing fodder.

Following the submissions, FRV have updated the design further and have also retained an area for cropping. It should be noted that at the end of this project, the land can be restored to full agricultural use, *unlike other* energy developments where the land would be absorbed fully and indefinitely.

Allowing sheep grazing and a solar farm provides dual use of the land and further sustains the local economy through job retention in the agricultural sector. The term 'AgriSolar' is commonly used to show the mutually beneficial relationship between both enterprises.

Q What key changes have FRV made in the design?

- A FRV have been conscious to incorporate feedback from neighbours, the local community and relevant agencies where practical. The concept design has been continually reviewed and while not all impacts can be fully mitigated, FRV have made practical and positive changes to enhance the design to help mitigate neighbours' concerns where practicable. Updates to the design have included a review and relocation of site access points, re-location of key infrastructure away from adjacent neighbours, improved plans for management of biodiversity and additional vegetation screening. Following the review of the submissions, the design was further reviewed and updated.

Q How will the site be accessed?

- A The main site access is proposed from the north-eastern corner of the site from Benambra Road via the Olympic Highway. The access was changed to this location to protect the amenity of surrounding neighbours, with this main entrance now over 1.4 kilometres from the nearest dwelling. Two auxiliary access points are proposed to cross Schneiders Road. All access points will be manned along with appropriate safety signage.

Q Has Cultural Heritage been considered in the design?

- A Yes. A Cultural Heritage assessment has been completed in consultation with the relevant parties. A detailed Cultural Heritage Management Plan will be created prior to construction if the project is approved. Identified Cultural and Scarred trees will also be retained and have been protected within the design of the project.

Q Will the value of by neighbouring property decrease due to the Solar Farm?

- A FRV understand this is a key question for individuals who may neighbour a proposed project. Mitigation measures are therefore vitally important to reduce the impact on adjacent properties. FRV has incorporated numerous practical and positive mitigation measures into the concept design for Walla Walla Solar Farm, including asset setbacks, vegetation screening and the considered location of infrastructure to protect the amenity and value of surrounding properties. These measures will protect rural character and preserve the visual qualities that contribute to the value of the surrounding region.
-

TECHNICAL

Q How does a solar farm create electricity?

Walla Walla Solar Farm's solar panels will be installed on ground-mounted frames that will move to allow the panels to track the daily movement of the sun. Using the solar energy they absorb, these solar panels then generate electricity that will be fed into an onsite power reticulation system before being dispatched to the local electricity distribution network. This technology operates best in direct, bright sunlight but can also produce power in low light or cloudy conditions.

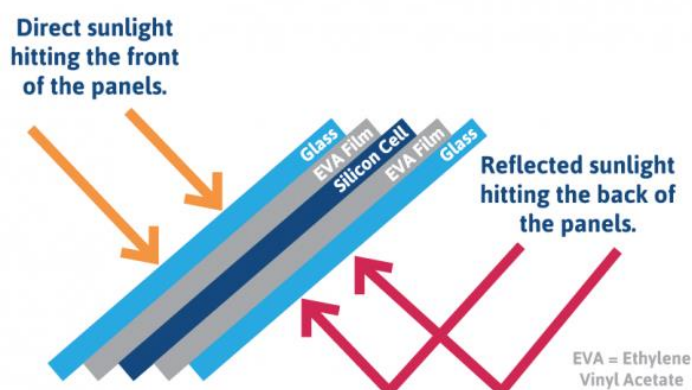
Q What type of panels will be used?

A The latest technology single axis tracker panels will be used on this project. These trackers change their orientation throughout the day to follow the sun from sunrise to sunset to maximise the energy captured. Solar cells within each panel are made from silicon wafers.

Q What materials are included in a solar panel? Are they hazardous to my neighbouring land or family?

A The solar panels FRV install are made entirely of inert materials, meaning that they do not react with anything and thus cause no harm to either the environment or to people.

Bifacial Solar Panel Cross Section



There is glass layering on the front and back of the panels, as well as the aluminium frame that runs around the edge of the panel. Both of these materials are harmless, and we handle them every day as bottles and cans.

Inside the glass layers are an Ethylene Vinyl Acetate (EVA) film, which is a glue that is used to attach the glass to the silicon cell. This glue is safe and has even been approved by the FDA for use in food production, packaging and transport.¹

The active layer is made from monocrystalline silicon, a solid material which generates electricity by absorbing the sun's rays and doesn't require any chemical reaction to do so. Silicon is one of the most abundant minerals on Earth and is found in all soils around the world in the form of quartz or sand.

Finally, the fine circuitry inside the panel which allows the flow of electricity is made from tin plated

¹ Agency for Toxic Substances & Disease Registry: <https://www.atsdr.cdc.gov/phs/phs.asp?id=669&tid=124>

copper and silver. Both of which can be found in households as water pipes and collectors, so do not pose any risk to the people and environment around the farm. All circuitry inside the panel is compliant with the globally adopted Restriction of Hazardous Substances (RoHS) Directive and verified by independent certification laboratories.

Q Do the panels contain Cadmium?

A No. We do not use solar panels which contain Cadmium. These are related to a different panel chemistry which are not found in silicon modules.

Q How high will the panels be?

A Panels will be installed on low-lying structures expected to be around 4m in height. When the panels are stowed horizontally, they will be approx. 2m in height.

Q Do solar panels cause glare?

A The purpose of solar panels is to absorb the sunlight, not reflect it. The panels are covered in an anti-reflective coating and only reflect a small amount (less than 2%) of the sunlight that falls on them. This reflective percentage is less than most other everyday objects like water surfaces and the glass windows on your home.

In addition, a vegetation buffers will be planted along parts of the solar farm to reduce the visual impact on neighbours and the local community.

Q Will the site contain a battery?

A Battery Energy Storage System (BESS) is not planned at present for this project, but with changing requirements it may be required and implemented at a future date. Battery technology is very mature and has been implemented in hundreds of thousands of sites including residential, commercial and utility applications all with similar technologies.

Q Are there known health risks associated with living near solar technology?

A Many Australian homes, airports, schools, hospitals etc have solar panels placed on their roofs as they are considered a mature and safe technology. The operation of a solar panel generates no emissions such as CO₂ or any other harmful gases and there are no toxic substances within panels that - if damaged - could cause health impacts. There are no situations in which being in the proximity of a solar farm can have adverse health effects and has been demonstrated by the gigawatts of solar farm installations throughout the world.

Q Will the panel design exacerbate wind from the west over neighbouring paddocks used for cropping, grazing?

A No. Walla Walla Solar Farm uses single axis tracking solar panel arrays that will be spaced between 8 – 14 metres apart. This increased distance between panel rows, combined with vegetation buffers, avoids the creation of a 'solar mass' and will prevent any build-up of wind speed or density over the solar farm that could impact neighbouring properties. This design layout will also protect the solar farm infrastructure itself, which is a key consideration for FRV in its desire to protect the wellbeing of its workers and optimise the performance of its

asset.

ENVIRONMENTAL

Q How do you manage fire risk?

Fire is a risk considered during the planning of a solar farm to ensure appropriate measures are included within the design to prevent, mitigate and manage any impacts to project personnel, assets and the wider community.

Full detail can be found within the EIS, however key items FRV have implemented into the design include;

- 6 proposed locations across the site with 20,000L Tank x2 (40,000L at each location)
- Additional Emergency Access points have been proposed across the site
- Proposed 2x Standpipes at existing RWCC waterpipe
- Quick fill pump unit at main entrance to site
- Sheep grazing to reduce fuel load
- 15 of the 17 farm dams on site to be retained
- A 10m wide Asset Protection Zone will be implemented around the entire perimeter of the project

Setbacks are a primary means of preventing widescale impacts from an unforeseen fire event. Below is a simple illustration of the clear setbacks which are implemented from legal property boundaries to the positioning of the PV Array - this includes the 10-metre Fire Protection Zone.



Additionally, a detailed Fire Management Plan is always required if the project is approved. This Plan is always completed in consultation with the local RFS.

Q How will you manage Hairy Panic & control weeds?

- A Through community consultation, FRV have been made aware of Hairy Panic. This weed will be addressed in project development, construction and operational management stages with clear guidance on how to monitor and mitigate any issues related to Hairy Panic.

FRV have implemented a strict 'wash down procedure' for all contractors, visitors and surveyors who need to visit the site - a practise which will continue throughout the full lifecycle of the solar farm. FRV have worked with local suppliers and will utilise local washdown facilities to assist in this matter to ensure the wash down and weed control is locally managed and local employment is supported.

During operations, a dedicated team member will be in charge of managing weeds within and around the solar farm which, when coupled with sheep grazing, will keep weeds to a minimum. FRV are also working with the landowners and local farming groups to ensure any land is sown with nitrogen rich plants such as clover and Lucerne to provide valuable food stock but that also assists with weed control.

Q Can sheep graze within the solar farm?

A Yes. Sheep grazing currently co-exists with operating solar farms across Australia and the world. Sheep grazing also reduces weeds and fire fuel load.

Q Will my neighbouring livestock and crops be impacted by any ‘heat island’ effects?

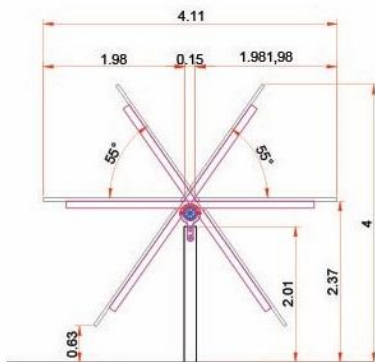
A Around the world and within Australia, sheep graze within solar farms. Livestock – including those proposed to be within the Walla Walla Solar Farm site during operations - will not be impacted as the design of the solar farm will ensure no significant build-up of heat at the site. Likewise, animals and crops on neighbouring properties will not be affected.

This is because the structure of the solar farm will not be thermally massive, i.e. there is no significant structure bulky enough to absorb and re-radiate an unsafe level of heat.

Walla Walla Solar Farm will also use single axis tracking technology, not ‘fixed’ panels, therefore avoiding ‘trapping’ heat underneath. These solar panels are thin (< 4cm) so they do not retain heat over the long term. During the daytime, panels track the sun, moving through the positions shown on the right, from sunrise to sunset.



Sheep grazing at an existing FRV solar farm.



Indicative profile view of a row of panels on tracking mount system. At night panels will be stowed in the horizontal position. (Dimensions in metres)

Spacing between rows will be between 8-14 metres. The tracking mount system will be programmed to store panels in stow position (i.e. facing up to the sky, approx. horizontal to the ground) at night for cooling. In the stow position panels are approx. 2 metres off the ground.

Although not a requirement under NSW State Authority (DPIE) guidelines, FRV have implemented the conservative Victorian State Authority (DELWP) guidelines by implementing a minimum width of 30 metres between any solar panels and the legal boundary of neighbouring farming land. FRV have combined these setbacks with extensive vegetation screening across the project.

FRV are also installing a meteorological station on the land to capture data of the specific site.

Q What is your flood analysis?

A Detailed hydrology is not a requirement during the initial planning process however FRV has been pro-active and commissioned for this work to undertaken, to address community concerns on this matter. This study is a site-specific in-depth analysis of the hydrology of the land and identifies flow rates and flooding depths using sophisticated LIDAR measurements taken by a Drone.

Based on this detailed survey, review of flood mapping, combined with the opinion of inhouse experts and information from local experience indicates that the site is not subject to a level of flooding that would impact the project. Detailed design work will mitigate any risks associated with periods of flooding.

To ensure that the creek is able to flow freely during the unusual periods of flood FRV are installing flood gates within the solar farm fence which also assist the ingress and exit of water. These will be installed and importantly, maintained throughout the life of the solar farm. In addition, FRV intend to upgrade a section of the creek which currently inhibits water flow.

In addition, the large areas between rows of solar panels allow for normal ground absorption of rain fall and no additional run off is perceived.

During the construction phase careful attention will be paid to minimising run off from tracks and this will be conditioned by the DPIE under the Construction Management Plan.

Q How will you mitigate noise to my property?

A Should the project be approved, a detailed construction noise management plan will be developed; where neighbours would be impacted by construction noise, it will include mitigation measures like use of noise barriers, alternative work practices and clear processes for consulting with neighbours. This plan requires approval prior to construction. Additionally, a dedicated Neighbourhood Liaison Officer will visit the occupants at least weekly to ensure that occupants are comfortable with the construction noise levels, assist with any mitigation proposals or requests and to update them on the rate of construction progress.

Q How many dams will be removed?

A There are 17 dams across the project site. 15 will be retained and only 2 are proposed to be removed. 10 of the retained dams will be enhanced for wildlife.

Q Fog occurs in this area; has it been taken this into consideration?

A Solar technology operates best in direct, bright sunlight but can also produce power in low light or cloudy conditions. Seasonal weather changes including fog are considered when calculating the energy production over the life of the solar farm. We use climate data from the Bureau of meteorology, and also install our own weather stations to measure irradiance and collect other weather data throughout the year on the specific site.

Q Can solar panels be recycled?

A Over 90% of a solar panel can be recycled. The main materials of a solar panel are glass, aluminium and silicon. All these items can be recycled. As the demand grows, so will the supply of recycling facilities with dedicated Australian based solar panel recycling companies already in operation.

Q What will happen at the end of the project?

A If a decision is made to decommission the solar farm then the asset will be disconnected from the electricity network and all infrastructure and assets will be removed from the site. Cabling will also be removed and materials will be either recycled or disposed of offsite. Building foundations would also be removed and the site

ripped and sown so that it can be returned to full agricultural use. The substation will be owned and operated by TransGrid and therefore decommissioning of this asset will be under their control.

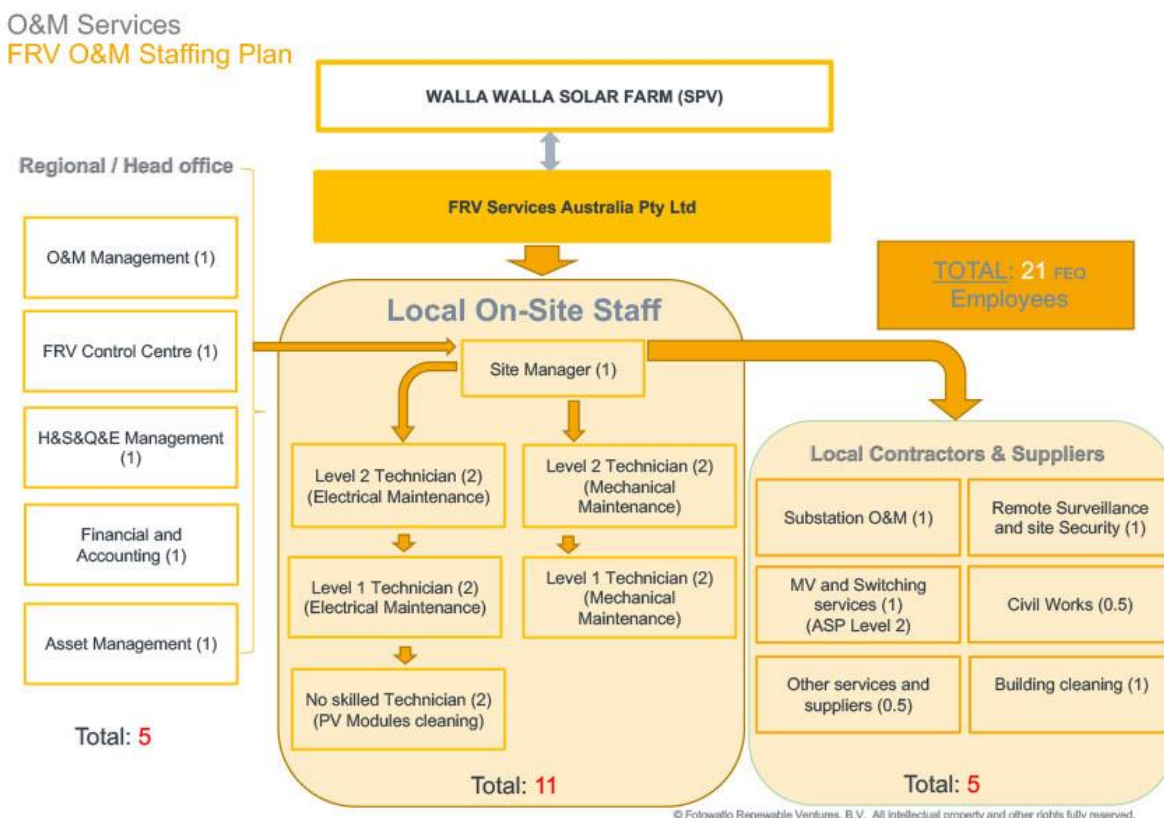
SOCIAL AND ECONOMIC

Q How many jobs will be available during construction of the Solar Farm?

A Employment opportunities will range from skilled to manual labour with jobs reaching 250 during the peak of construction. Utilising qualified local content is always key element for FRV when developing a project. FRV is keen to work with local service and product suppliers to simulate the local economy. We strongly encourage local individuals to put forward their interest in employment either for labouring or as a supplier via our website. FRV have already been engaging local and regional suppliers during the early development of the project.

Q How many jobs will be available during operations of the Solar Farm?

A 21 jobs are likely to be required during the 30-year project. The jobs available will include the following:



Q With the exception of job creation, what other benefits will the community receive?

A As the solar farm will be operating for 30 years, FRV is committed to giving back to the local community and will be working with Greater Hume Shire Council, local groups and organisations, to determine where funds can be best

allocated to provide optimum benefit to the community. FRV have committed to a Voluntary Planning Agreement (VPA) with Greater Hume Shire Council.

Q What will you do to manage traffic impacts?

A Temporary traffic impacts on local roads are anticipated during the construction phase of the Project. A Traffic Management Plan will be developed to instruct contractors as to the safe and appropriate use of local roads to limit delays for local road users. Where possible, alternative means of transporting personnel to site – such as buses – will be considered to reduce traffic loads, particularly if other solar developments in the area are contributing to cumulative traffic impacts.

Q Will there be a contact onsite at all times in case of emergency?

A The plant is fully maintained throughout the life of the solar farm. There will be a 24/7 contact. An Operations Manager and other staff members will be based in close proximity to the solar farm. The Solar Farm will also be monitored 24/7 by remote CCTV and regular security and operational patrols.

Q What is a Power Purchase Agreement (PPA)?

A A power purchase agreement or a PPA is simply a contract to buy power. The contract will specify the price of which the power is bought and length of the contract. Sellers of these agreements are utility scale generators e.g. Solar and Wind Farms. Purchasers of these contracts have significant electricity requirements which allows them to purchase all or some of the output of a project. Examples of buyers include utilities, governments and major corporates. Examples of companies which have entered into PPAs across Australia include E.g. Telstra, Mars, Blue Scope Steel, Snowy Hydro, UNSW, Coles etc with many others considering this option. FRV have secured PPA's for both our Goonumbla Solar Farm & Sebastopol Solar Farm in NSW.

Q What are the insurance implications for neighbouring properties to a solar farm?

A As a global and well-established company, FRV have extensive insurance policies in place for all our projects. In the unlikely event that the solar farm is damaged due to a bushfire, FRV would seek to claim from this insurance. It is important to note, that this is a valuable and important asset to FRV and therefore will be implementing all the necessary requirements to protect the project. A detailed Bushfire Management Plan is prepared for all our projects. Due to the level of detail in mitigation measures, compared to the original use of the land, it can make a project a comparatively benign proposition and reduce the risk presented to the site.

D.9 CORRESPONDENCE WITH COUNCIL REGARDING A VPA

From: Cliona Gormley
Sent: Thursday, 19 March 2020 3:37 PM
To: 'Colin Kane' <CKane@greaterhume.nsw.gov.au>; 'Steven Pinnuck' <SPinnuck@greaterhume.nsw.gov.au>
Cc: Tarek Alsampaile <tarek.alsampaile@frv.com>; 'Bridgette Poulton' <bridgette.p@nghconsulting.com.au>
Subject: RE: Proposed Walla Walla Solar Farm | Response to Submission

Hi Colin & Steve,

Firstly, thank you both for your time on the phone yesterday. It was extremely beneficial to go through your submission in detail and ensure that we have been appropriately addressing all the points you had raised in your submission for the proposed Walla Walla Solar Farm. It was positive to note the work we have been implementing has been effective in addressing these items.

As discussed, please find attached the final signed letter regarding our commitment to the Greater Hume Shire Council regarding the Voluntary Planning Agreement (VPA). We welcome your VPA template when you are in a position to share the document and look forward to the continued engagement with you on this project.

Please feel free to contact me at any time.

Kind Regards
Cliona



From: Cliona Gormley
Sent: Wednesday, 18 March 2020 12:37 PM
To: Colin Kane <CKane@greaterhume.nsw.gov.au>; 'Steven Pinnuck' <SPinnuck@greaterhume.nsw.gov.au>
Cc: Tarek Alsampaile <tarek.alsampaile@frv.com>; 'Bridgette Poulton' <bridgette.p@nghconsulting.com.au>
Subject: Proposed Walla Walla Solar Farm | Response to Submission
Importance: High

Hi Colin & Steve,

In advanced of our call today, we wanted to share with you the attached signed letter from our Managing Director in regards to the VPA. *Apologies for sharing this last minute, signature just came through.*

We have worked extremely hard and are pleased to be able to accommodate Councils requests. We confirm the following;

- The proposed voluntary financial contribution will be in the form of a Voluntary Planning Agreement ("VPA").
- Financial contribution has been updated to better reflect Council's expectations.

Looking forward to speaking with you shortly to discuss and address your comments within your submission.

Many thanks
Cliona



D.10 BROADER COMMUNITY PROJECT UPDATES POST EIS SUBMISSION

From: Cliona Gormley
Sent: Thursday, 24 October 2019 6:24 PM
To: Sarah Stent <sarah@banksiacomms.com.au>
Subject: Proposed Walla Walla Solar Farm I EIS | Public Exhibition

Hello everyone,

As promised, I would like to inform you that the Environmental Impact Assessment (EIS) for the proposed Walla Walla Solar Farm has been submitted to the Department of Planning, Industry and Environment (DPIE) for assessment. The Department are currently finalising their internal processes, advising that they anticipate Public Exhibition will commence on 01 November 2019.

You will be able to view the application through the following link;

<https://www.planningportal.nsw.gov.au/major-projects/project/9931>

Please feel free to contact me on the details provided below or alternatively our dedicated Community Engagement Officer, Sarah Stent;

- 0418 142 173
- sarah@banksiacomms.com.au

Have a lovely evening.

Cliona



Cliona Gormley
Development - Australia

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Response to Submissions Walla Walla Solar Farm

From: Cliona Gormley
Sent: Tuesday, 3 December 2019 4:51 PM
To: 'Sarah Stent' <sarah@banksiacomms.com.au>
Subject: Proposed Walla Walla Solar Farm I EIS | Responding to Submissions

Good afternoon,

Thank you to everyone who took the time to read through the Environmental Impact Statement for the proposed Walla Walla Solar Farm.

The NSW Department of Planning's Public Exhibition has now ended and the next stage of the State Significant Development Assessment process is for us to consider and respond to any submissions that have been made. Once submissions have been made available to us, we will be going through them in detail and will respond in writing to the Department. The Department will provide a recommendation after they have completed a full assessment of the proposal.

For those that would like to know more about the State Significant Planning Process, further information is available [here](#).

Myself and Sarah Stent will be in Walla Walla and Culcairn in January for further discussions with project stakeholders. If you have further questions or would like to talk with us about the remaining steps in the planning process, please get in touch with either myself or Sarah so we can arrange a suitable time and date.

Sarah Stent:

- 0418 142 173
- sarah@banksiacomms.com.au

Thank you again for your input and patience.

Kind regards,
Cliona Gormley



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APPENDIX E PROVISIONS FOR A VOLUNTARY PLANNING AGREEMENT WITH COUNCIL



Powering a Sustainable Future

Director Environment & Planning
Greater Hume Council
39 Young St
PO Box 99
Holbrook
NSW 2644

19th March 2020

Dear Mr Kane,

RE: CONFIDENTIAL: Voluntary Planning Agreement (VPA) for the proposed Walla Walla Solar Farm

FRV have always been committed to providing meaningful, sustainable and financial benefits to the local area of the proposed Walla Walla Solar Farm. This commitment was in the form of a signed letter by the FRV Managing Director dated 9th October 2019 and formed part of our Environmental Impact Statement, submitted to the Department of Planning, Investment & Environment. The same information was shared with Greater Hume Council on 18th November 2019.

Through further discussions, Council's feedback has been carefully considered. FRV wish to confirm your requests:

- The proposed voluntary financial contribution will be in the form of a Voluntary Planning Agreement ("VPA").
- Financial contribution has been updated to reflect Council's expectations.

FRV is pleased to provide the Greater Hume Shire Council with an updated proposal structured in the form of an Upfront and Ongoing payment schedule which can be viewed in the table below. (The Initial Proposal dated 9th October 2019 has been added for reference);

PROPOSAL	UPFRONT CONTRIBUTION	ONGOING CONTRIBUTION – 30 yrs	TOTAL CONTRIBUTION
Initial Proposal 9th October 2019*	\$495,000	\$840,000	\$1,335,500
Updated Proposal in the form of a VPA**	\$700,000	\$2,028,404	\$2,728,404

**Initial Proposal 9th October 2019 details outlined in FRV original letter dated 9th October 2019 submitted with EIS.*

***Updated Proposal with Upfront Contribution is payable at the commencement of construction and the completion of Financial Close. Ongoing Contribution is \$50,000 with 2% CPI for 30 years.*



Powering a Sustainable Future

As detailed above, FRV reiterate its commitment to continued engagements with GHS Council in order to provide upfront and ongoing benefits to the local area. This letter shall not give rise to any legally binding rights or obligations, the above contributions will be provided should Development Approval be granted and the project reaches financial close and construction starts.

Below are the beneficial sectors that we have previously suggested as a reference, however FRV are flexible and willing to work with the Council to finalise the VPA and how it would be structured.

Following the extensive community engagement FRV undertook to understand the needs within the local area. FRV are committed to continued engagement with Greater Hume Shire Council, to ensure that funds will provide upfront and on-going genuine and sustainable benefits to the community. FRV have identified 9 key areas which investment could potentially be supplied to;

- Council
- Tourism
- Safety
- Education
- Environment
- Youth
- Health
- Local Business
- Energy

The following projects/initiatives detailed below fit broadly with the key interests and expectations of primary stakeholder groups listed above. Please note the below initiatives are simply suggestions and ideas and are not requirements under the VPA.

Ideas: Community Projects/Initiatives which could Benefit from the VPA

Council

Great Hume Shire Council (GHS)

FRV believes it is important to work with the local Council as they are an integral part of any community and wishes to support them in their '2030 - Our Vision for the Future'. This vision will be achieved through the implementation of the strategies based on the four core themes of 'Live A Greater Life Community Strategic Plan 2017 – 2030'.

Those themes are:

- Leadership and Communication
- Healthy Lifestyle
- Growth and Sustainability
- Good Infrastructure and Facilities



Powering a Sustainable Future

Tourism

Silo Art Program

The Walla Walla Silo Art Committee (part of the Walla Walla Community Development Committee) proposes to commission a significant public artwork on the Walla Walla Silos. Artwork on major regional infrastructure like silos is a major tourist attraction and offers potential to bring tourism to Walla Walla (and its businesses) as part of emerging 'Silo Art Trails'.

This project is in its infancy. Fundraising has just commenced for the project with funding sources expected from local businesses, and contributions from residents. Grant funding will also be explored at a later date. A set budget amount has yet to be established, however similar projects have been known to cost in the vicinity of \$11,000 - \$25,000.

FRV has the opportunity to contribute a set or ongoing amount towards the art project to demonstrate its commitment to 'giving back' to the local community – and in support of a major project that the community itself believes will secure the sustainability of the region.

Safety

Rural Fire Service Support

Rural Fire Brigades are often more than just an emergency service. They can also be a vital community service, provide a community meeting point or offer assistance with non-emergency roles. Many Rural Fire Brigades conduct fundraising activities at community events, through events such as coin collections or BBQs. These proceeds go directly to assisting the Brigade with community activities. Contributions are tax deductible.

It is recommended that FRV engage with the Secretaries/Presidents of each of the local Brigades (Walla Walla, Culcairn and Gerogery) to ascertain if a contribution or specific funding pledge would be preferred. Brigades may then choose to use funds for equipment, training, volunteer recruitment or community awareness events.

Education

There are six schools within a 20 kilometer radius of the solar farm site. Families from each target community are likely to send their children to one or more of these schools;

School
St Joseph's - Culcairn
Billabong High School - Culcairn
St Paul's College – Walla Walla
Walla Walla Primary School
Gerogery Primary School
Burrumbuttock Primary School



Powering a Sustainable Future

School Suggestion Example – St. Paul’s College

St Paul’s College, in Walla Walla, is an agricultural 7-12 college, renowned for its programs in equine, academics, agriculture, and boarding.

A recent initiative of the School’s Student Council was a ‘Farmer’s Day’ and Careers Expo – focusing on rural study and career opportunities, rural wellbeing and awareness around bullying.

It is possible the College – and its Student Council – would benefit from a commitment of once off or ongoing financial support from FRV to ensure these key events can continue to be held. Additionally, FRV could participate in the expo by manning a stall to explain opportunities and employment options in solar farming to students and the benefits that Agri-Solar can have to farming enterprises.

Alternatively, funding could be provided to assist the school upgrade its science and art supplies and/or extend its Agriculture Program via planned curriculum upgrades.

Coupled with this, FRV are open to the idea of a partnership with the schools and having an annual school trip to the Solar Farm, for the children to learn more about solar technology and the inter-relationship that a solar farm has with the land and farming practices.

Childcare Centre

A new Childcare Centre has been constructed in Walla Walla which FRV could also support. This centre is aiming to attract families to not only work in Walla Walla but also to be able to live and settle there instead of commuting from larger surrounding towns such as Albury. Having such a facility will allow families access to the appropriate childcare so they can work and live locally.

Environment

Gum Swamp Committee – Biodiversity Plantings

Gum Swamp is a nationally significant wetland, located two kilometers north of Walla Walla, NSW. It is also the end destination of waters that flow through the region, including the land on which the solar farm is proposed.

The wide variety in plant species provides habitat for a multitude of birds, possums, bats and reptiles. Numerous threatened species including the Squirrel Glider, Brown Tree Creeper, Grey-crowned Babbler, Brolga, White-bellied sea-eagle and the Fishing Bat are found at Gum Swamp.

As a volunteer committee, private funding is desirable to assist with development and implementation of programs that continue to support the preservation of this area:

- Weed and pest control
- Water quality monitoring
- Preservation of protected species
- Further regeneration of habitat and native vegetation

The Committee has also advised it would like to utilise funding to develop an ‘all-access’ trail around the Gum Swamp area. This will improve amenity at the Swamp and further contribute to the tourism potential of the township.

At a larger scale, funding could also be utilised for the Gum Swamp Committee, in collaboration with its partners Landcare, and possibly other solar developers in the region, to extend its programs to private landholders,



Powering a Sustainable Future

upstream of the Swamp, to build their capacity to protect rivers and creeks on their land. This would tie in with private efforts by FRV to improve the quality of water flows in the river catchment on the solar farm site and highlight its efforts to create a positive environmental legacy.

Youth

Youth Advisory Committee – Events Budget

The Greater Hume Council Youth Advisory Committee has been established by Greater Hume Council to work proactively with Council and other agencies to raise and address issues of concern focusing on youth in the Greater Hume Local Government Area (LGA). In addition, the group arranges regular youth-oriented events in the municipality to encourage social connection and wellbeing of the area's largely rural population. Events include mental health workshops, pool parties, school holiday sports activities and movie nights. Evidence suggests these events are highly regarded.

It is proposed FRV considers ongoing funding for the Youth Advisory Committee to enable more events to be planned and delivered within the region. While the service is Council-funded, additional funding from a 'partnership sponsor' could enable the program to expand – or deliver more events in a calendar year.

Health

Local Sport's Clubs - Funding

Sport Clubs are often the heart of a regional community, providing opportunities for social interaction and bringing families together to support both juniors and seniors in their sporting events. It has been found that these sporting clubs bring higher levels of self-esteem and self-worth to individuals.

The key sports identified in the local area are;

- Football
- Netball
- Tennis
- Bowls
- Croquet
- Cricket
- Swimming

Engagement with a number of clubs have been undertaken to determine how best to provide funding. Clubs may then choose to use funds for equipment, training, events etc.

Local Business

Local Drought Fund

With farming being the prime industry in this area, many farmers are continuing to feel the negative impacts of droughts and climate change. FRV wish to help support farmers and develop an appropriate Drought Fund in collaboration with the local community, Council and NSW Farmer's Association.



Powering a Sustainable Future

Drought is a national weather-related economic impact. The operation of this project itself will help combat our dependency on fossil fuels which are currently influencing the devastating impacts of climate change.

FRV will also be utilising and supporting local businesses and suppliers during both the construction and operational life of the project (including accommodation, catering, fuel etc). Funds can also be used to help farmers diversify and therefore strengthen their resilience to the income impacts experienced from drought. For those who have already diversified, support can be provided to their local business e.g their advertising, painting & decorating etc.

Energy

Domestic PV Installation x 3 and energy efficiency savings

FRV have identified 3 uninformed immediate residents within 1km of the project. In order to encourage green energy and sustainability, FRV wish to provide further support to these 3 properties by offering a domestic PV installation or any other form of energy efficiency savings, with a value worth up to \$10,000 each. FRV would also source a local/regional supplier(s) to inspect the viability of each property for the following 3 residents;

- R1a
- R2
- R5a

Installation of solar panels is a practical means for local residents and businesses to take action to reduce their energy costs and their impact on the climate.

FRV will continue to reiterate both its commitment and genuine engagement during the development process, as well as a willingness to operate as a responsible business within the local community over the long-term.

Kind regards,

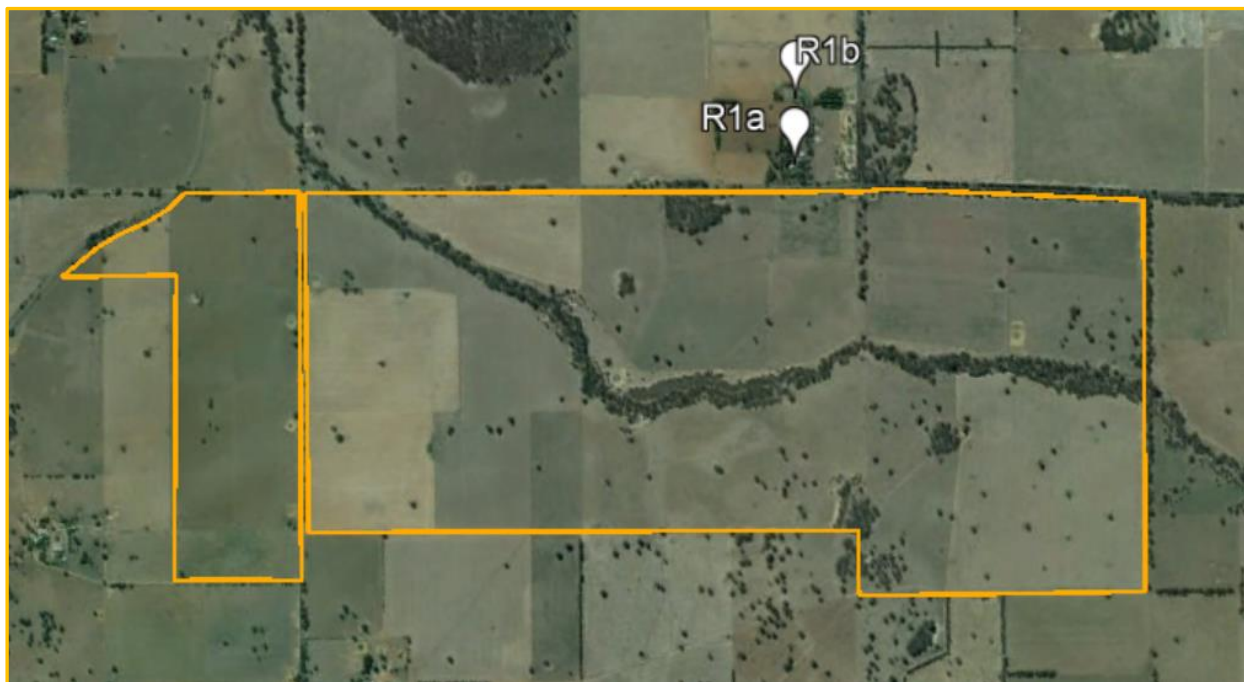
Carlo Frigerio
Managing Director
FRV Services Australia Pty Limited

APPENDIX F ACHAR VERSION 2

APPENDIX G NEAR NEIGHBOUR MITIGATION MEASURES

R1– Mitigation Measures

This document provides a summary of the mitigation measures for R1a & R1b. R1a is the closest receptor and located approx. 80m north from the legal property boundary. Once mitigation measures are implemented, R1a will be at least 210m from solar arrays.



Following consultation with R1, the following mitigation measures have been proposed;

ID	Safeguard & Mitigation Measure
Site Access	3 main access points were proposed by the previous developer along Benambra Road, with traffic travelling past the property creating unnecessary dust and noise impacts. FRV have closed these proposed access points and created one single main access point to the North-East of the project, now approx. 1.4km away from R1a.
O&M Buildings	FRV have also changed the location of the proposed Operations and Maintenance facilities to the main entrance area located over 1.4km away from the property, ensuring no operation vehicles need to travel past the property over the lifetime of the project.
Existing Vegetation	Existing, mature boundary vegetation will now be retained.
Setback	Altered the solar array design layout, setting-back solar panels directly opposite the R1a homesteads. This is referred to as a 'visual set-back' and will be undeveloped and left as grazing paddocks to provide the residences a sense of space.
Vegetation Screening	<p>After the above setback an extensive 50m vegetation buffer, including 6 rows of trees will be implemented. A detailed landscaping plan has been proposed;</p> <ul style="list-style-type: none"> ▪ Specific species that would effectively develop across the understory, mid- and top-canopy structures; ▪ Specific species (shrubs and trees) that encourage foraging, pollination and habitat creation for local insects, birds and fauna; ▪ Erecting nesting and faunal boxes to encourage wildlife use of the area, and

	<p>▪ Connect to existing vegetation to create an ecological corridor for local and seasonal Wildlife.</p> <p><i>N.B Advanced planting was offered to provide neighbours with at least 2.5years of additional growth at FRVs commercial risk but residents wished to wait until project determination.</i></p>
APZ	From the above vegetation buffer, a further 10m setback will occur for the Asset Protection Zone (APZ) and will traverse the full project boundary for fire safety.
Security Fence	After the APZ, only then will the Solar Farm security fence be installed. This fence will therefore be shielded in due course from the proposed vegetation screening. The security fence will also have no barbed wire to reduce impact on wildlife and soften the appearance.
Further Setback	An additional 5m minimum setback has been included between the security fence and solar array.
Inverter Exclusion Zone	From R1a, a 400m radius 'Inverter Exclusion Zone' has been implemented. Therefore, the design has been altered so no inverters will be installed within 400m, to further reduce visual impact to R1a.
Weed Management	FRV have implemented a strict 'wash down procedure' for all contractors, visitors and surveyors who need to visit the site - a practise which will continue throughout the full lifecycle of the solar farm.
Noise	A detailed construction noise management plan will be developed; this is likely to include mitigation measures like use of noise barriers, alternative work practices and clear processes for consulting with neighbours. This plan requires approval prior to construction. Additionally, a dedicated Neighbourhood Liaison Officer will visit the occupants at least weekly to ensure that occupants are comfortable with the construction noise levels, assist with any mitigation proposals or requests and to update them on the rate of construction progress.
Communication	Access to directly communicate and engage with FRV has been provided and will continue to be provided over the lifetime of the project.

Proposed Landscape Plan

KEY

5 Northern Vegetation Buffer – 50m width x 560m length = 28,000m² (2.8 Ha)

15 Inverter Exclusion Zone – 400m radius






50m wide revegetation area along northern boundary comprising a variety of indigenous tree, shrub, grasses and ground cover species to provide layered vegetation for visual amenity and habitat

Large evergreen trees e.g.
Eucalyptus blakelyi (Blakely's Red Gum)
Eucalyptus melliodora (Yellow Box)
Eucalyptus polyanthemos (Red Box)

Medium evergreen trees e.g.
Acacia dealbata (Silver Wattle)
Acacia implexa (Lightwood)
Allocasuarina luehmanna (Bulloak)
Allocasuarina verticillata (Drooping Sheoak)

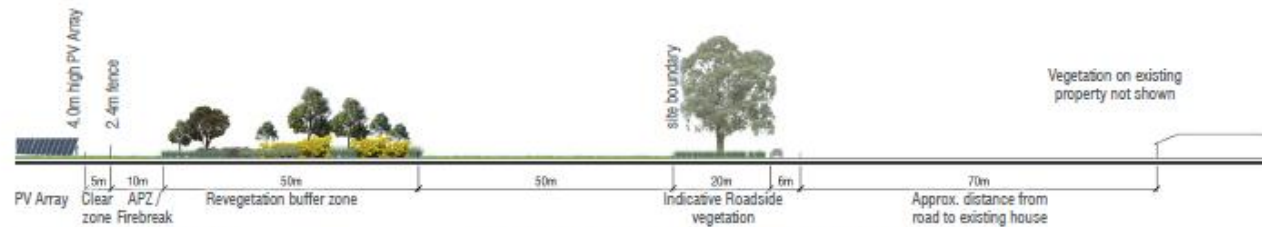
Shrubs and groundcovers e.g.
Acacia acinacea (Gold-dust Wattle)
Acacia rubida (Red-stemmed Wattle)
Bursaria spinosa (Sweet Bursaria)
Dodonea viscosa subsp. *angustissima* (Narrow-leaf Hop-bush)

Asset Protection Zone / Firebreak – 10m wide

-  Existing vegetation to be retained
-  Proposed native vegetation buffer
-  PV Array
-  Asset Protection Zone (APZ) / Fire break – 10m width
-  Retained Dam



PLAN 1:4000



SECTION 1:1000 @ A3

Section graphical illustration indicative growth 5 – 8 years

Photomontages



a) Existing Undeveloped View



b) Infrastructure Superimposed (prior to screening)



c) Infrastructure Superimposed with proposed Vegetation Screening

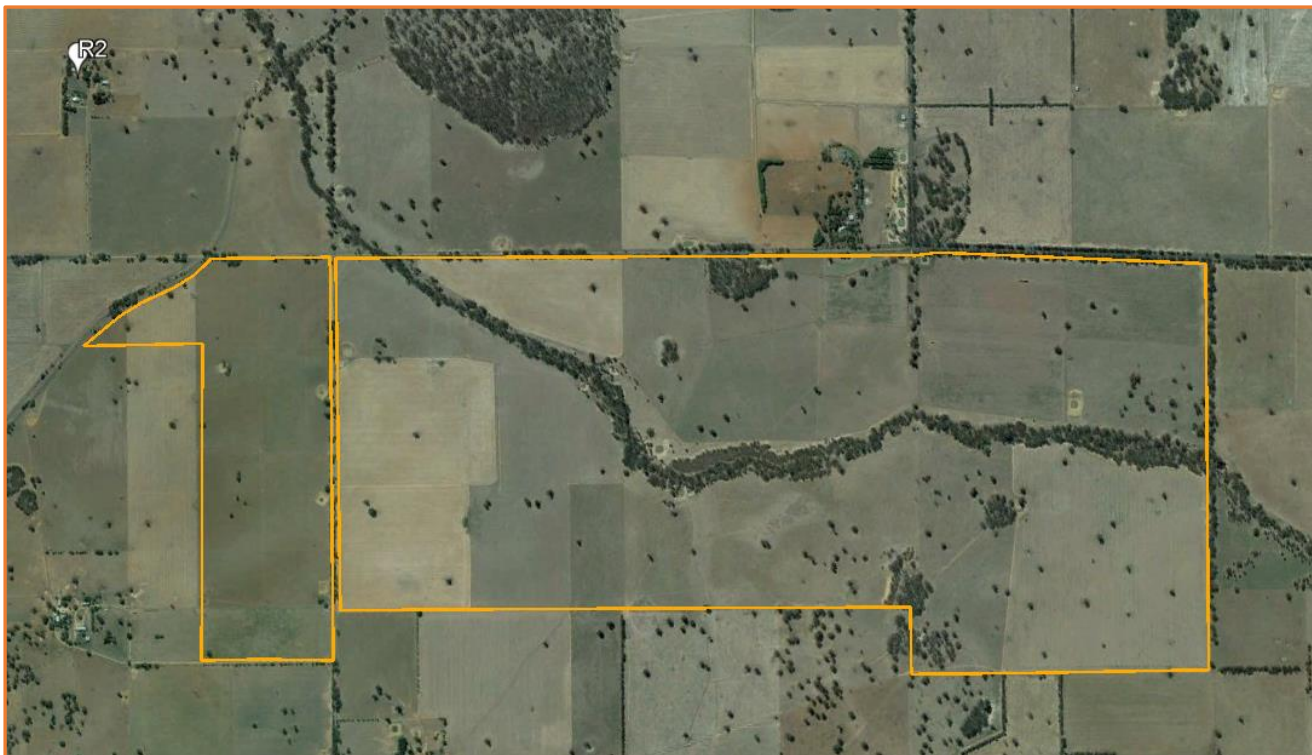
Figure 6-3 Existing, infrastructure and infrastructure with vegetation screening - views from the driveway of R1a

Walla Walla Solar Farm

FRV

R2 – Mitigation Measures

This document provides a summary of the mitigation measures for R2. R2 is located over 800m north-west from the legal boundary.



Following consultation with R2, the following mitigation measures have been proposed;

ID	Safeguard & Mitigation Measure
Site Access	3 main access points were proposed by the previous developer along Benambra Road, with traffic travelling in close proximity to the R2 property creating unnecessary dust and noise impacts. FRV have closed these proposed access points and created one single main access point to the North-East of the project, now approx. 4.4km away from R2.
O&M Buildings	FRV have also changed the location of the proposed Operations and Maintenance facilities to the main entrance area located over 4.4km away from the property, ensuring no operation vehicles need to travel near the property over the lifetime of the project.
Substation Relocation	FRV reinvestigated the location of the substation and undertook a redesign and have moved this piece of infrastructure 100m South to accommodate the views of R2.
Existing Vegetation	By altering the location of the substation, existing, mature boundary vegetation can now be retained, further protecting the views of R2.
Non-Development Area	Solar Panels have not been proposed in the most north-western section of the development site.

<p>Vegetation Screening</p>	<p>Along with moving the substation, an extensive 50m vegetation buffer, including 6 rows of trees will be implemented. A detailed landscaping plan has been proposed;</p> <ul style="list-style-type: none"> ▪ Specific species that would effectively develop across the understory, mid- and top-canopy structures; ▪ Specific species (shrubs and trees) that encourage foraging, pollination and habitat creation for local insects, birds and fauna; ▪ Erecting nesting and faunal boxes to encourage wildlife use of the area, and ▪ Connect to existing vegetation to create an ecological corridor for local and seasonal Wildlife <p><i>N.B Advanced planting was offered to provide neighbours with at least 2.5years of additional growth at FRVs commercial risk but residents wished to wait until project determination.</i></p>
<p>Additional Screening</p>	<p>Additional screening has also been implemented in the north-west boundaries including 5m and 10m buffers which will also help facilitate views of the project from R2.</p>
<p>APZ</p>	<p>A 10m Asset Protection Zone (APZ) is included in the concept design and will traverse the full project boundary for fire safety.</p>
<p>Security Fence</p>	<p>After the APZ, only then will the Solar Farm security fence be installed. This fence will therefore be shielded in due course from the proposed vegetation screening. The security fence will also have no barbed wire to reduce impact on wildlife and soften the appearance.</p>
<p>Further Setback</p>	<p>An additional 5m minimum setback has been included between the security fence and the solar array.</p>
<p>Weed Management</p>	<p>FRV have implemented a strict 'wash down procedure' for all contractors, visitors and surveyors who need to visit the site - a practise which will continue throughout the full lifecycle of the solar farm.</p>
<p>Noise</p>	<p>A detailed construction noise management plan will be developed; this is likely to include mitigation measures like use of noise barriers, alternative work practices and clear processes for consulting with neighbours. This plan requires approval prior to construction. Additionally, a dedicated Neighbourhood Liaison Officer will visit the occupants at least weekly to ensure that occupants are comfortable with the construction noise levels, assist with any mitigation proposals or requests and to update them on the rate of construction progress.</p>
<p>Communication</p>	<p>Access to directly communicate and engage with FRV has been provided and will continue to be provided over the lifetime of the project.</p>

Proposed Landscape Plan

KEY

- 6** High Pressure Gas Pipeline Easement (24m) – no works to occur without prior authorisation of the pipeline operator
- 7** Transgrid Access
- 8** Transgrid Substation
- 9** Northwest Vegetation Buffer I – 50m width x 244m length = 12,200m² (1.22 Ha)
- 10** Overhead Transmission Line
- 11** Northwest Vegetation Buffer II – 10m width x 465 length = 4,650m² (0.465 Ha)
- 16** Northwest Vegetation Buffer III – Eastern block – 5m width x 286 length = 1,430m² (0.143 Ha)
Western block – 5m width x 592 length = 2,960m² (0.296 Ha)

Revegetation area along northern boundary comprising a variety of indigenous tree, shrub, grasses and ground cover species to provide layered vegetation for visual amenity and habitat

Medium evergreen trees e.g.
Acacia dealbata (Silver Wattle)
Acacia implexa (Lightwood)
Allocasuarina luehmannii (Bulloak)
Allocasuarina verticillata (Drooping Sheoak)

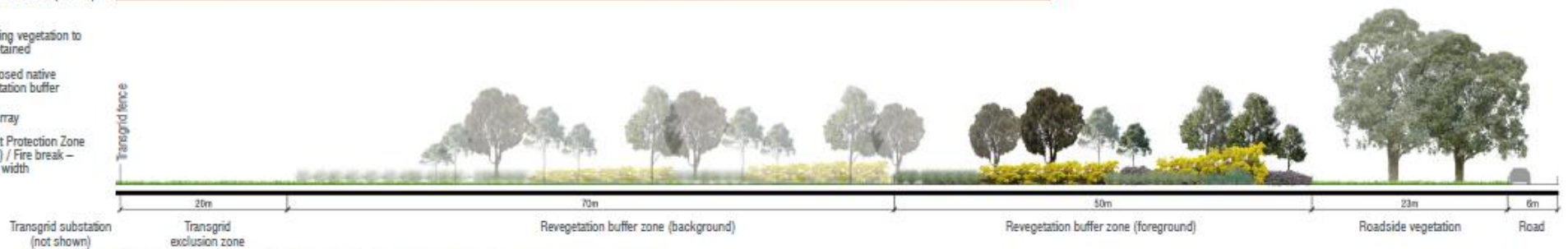
Large evergreen trees e.g.
Eucalyptus blakelyi (Blakely's Red Gum)
Eucalyptus melliodora (Yellow Box)
Eucalyptus polyanthemos (Red Box)

Shrubs and groundcovers e.g.
Acacia acinacea (Gold-dust Wattle)
Acacia rubida (Red-stemmed Wattle)
Bursaria spinosa (Sweet Bursaria)
Dodonea viscosa subsp. *angustissima* (Narrow-leaf Hop-bush)



PLAN 1:4000

-  Existing vegetation to be retained
-  Proposed native vegetation buffer
-  PV Array
-  Asset Protection Zone (APZ) / Fire break – 10m width



SECTION 1:500 @ A3 Section graphical illustration indicative growth 5 – 8 years

Photomontages



a) Existing undeveloped view



b) Infrastructure superimposed (prior to screening)



c) Infrastructure superimposed with proposed vegetation screening

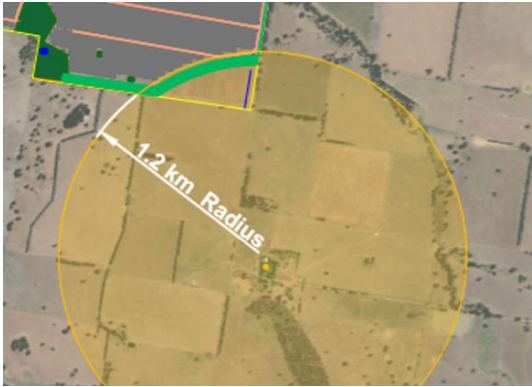
Figure 6-5 Existing, original infrastructure and mitigated views from the second floor balcony of Residence 2

R5a – Mitigation Measures

This document provides a summary of the mitigation measures for R5a. R5a is located over 800m south-east from the legal boundary of the proposal. R5a will now be setback 1.2km from the solar arrays.



Following consultation with R5a, the following mitigation measures have been proposed;

ID	Safeguard & Mitigation Measure
Setback	<p>The solar array design layout has been amended, setting-back solar panels by 1.2km from the wedding venue. This area will remove 12.4ha from FRVs development as a significant measure to protect Orange Grove Gardens views.</p> 
Retained Cropping Area	<p>As the Orange Grove Gardens avail of the surrounding landscape and neighbouring land for photographs for their business, FRV have confirmed the south-eastern corner which will no longer contain solar panels, will be retained for cropping and other agricultural purposes. Confirmation has been obtained by the landowner that this area will continue to be used for normal agricultural purposes and a landowner access track has been incorporated into the design along the southern boundary to allow access to crop and farm the area.</p>

<p>Vegetation Screening</p>	<p>A further mitigation measure includes an extensive 50m vegetation buffer, including 6 rows of trees along the southern boundary and looping within the inner edge of the 1.2km radius solar panel setback. A detailed landscaping plan has been proposed;</p> <ul style="list-style-type: none"> ▪ Specific species that would effectively develop across the understory, mid- and top-canopy structures; ▪ Specific species (shrubs and trees) that encourage foraging, pollination and habitat creation for local insects, birds and fauna; ▪ Erecting nesting and faunal boxes to encourage wildlife use of the area, and ▪ Connect to existing vegetation to create an ecological corridor for local and seasonal Wildlife <p><i>N.B Advanced planting was offered to provide neighbours with at least 2.5years of additional growth at FRVs commercial risk but residents wished to wait until project determination.</i></p>
<p>APZ</p>	<p>A 10m Asset Protection Zone (APZ) is included in the concept design and will traverse the full project boundary for fire safety.</p>
<p>Security Fence</p>	<p>After the APZ, only then will the Solar Farm security fence be installed. This fence will therefore be shielded in due course from the proposed vegetation screening. The security fence will also have no barbed wire to reduce impact on wildlife and soften the appearance.</p>
<p>Further Setback</p>	<p>An additional 5m minimum setback has been included between the security fence and solar array.</p>
<p>Weed Management</p>	<p>FRV have implemented a strict ‘wash down procedure’ for all contractors, visitors and surveyors who need to visit the site - a practise which will continue throughout the full lifecycle of the solar farm.</p>
<p>Noise</p>	<p>A detailed construction noise management plan will be developed; this is likely to include mitigation measures like use of noise barriers, alternative work practices and clear processes for consulting with neighbours. This plan requires approval prior to construction. Additionally, a dedicated Neighbourhood Liaison Officer will visit the occupants at least weekly to ensure that occupants are comfortable with the construction noise levels, assist with any mitigation proposals or requests and to update them on the rate of construction progress.</p>
<p>Communication</p>	<p>Access to directly communicate and engage with FRV has been provided and will continue to be provided over the lifetime of the project.</p> <p>Welcomed the official dates of any wedding bookings which the Orange Grove Gardens have so this can be analysed and taken into consideration for the Construction Management Plan.</p>

Proposed Landscape Plan

KEY

- 1** Southern Vegetation Buffer –
50m width x 1100m length = 55,000m² (5.5 Ha)
- 2** Eastern Vegetation Buffer –
5m width x 1000m length = 5,000m² (0.5 Ha)
- 18** Distance to Eastern Boundary – 30m
- 21** R5a Setback – 1.2km Radius
- 22** Retained cropping land
- 23** 5m wide cropping access track

50m wide revegetation area along southern boundary comprising a variety of indigenous tree, shrub, grasses and ground cover species to provide layered vegetation for visual amenity and habitat

Development Exclusion Zone

Asset Protection Zone / Fire break – 10m wide





Large evergreen trees e.g.
Eucalyptus blakelyi (Blakely's Red Gum)
Eucalyptus melliodora (Yellow Box)
Eucalyptus polyanthemos (Red Box)

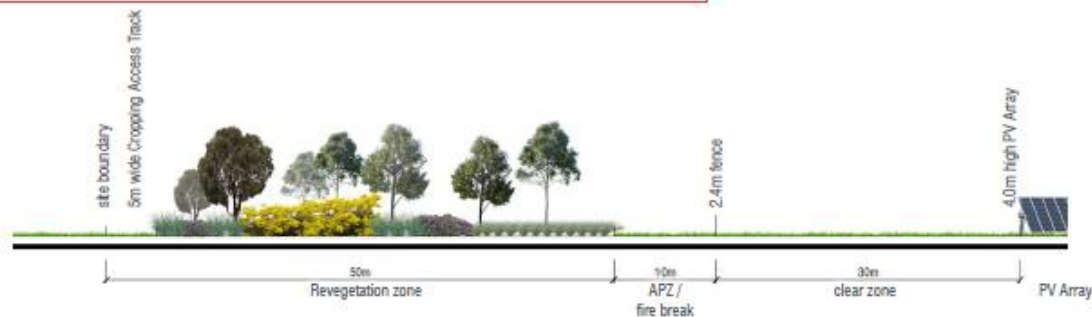
Medium evergreen trees e.g.
Acacia dealbata (Silver Wattle)
Acacia implexa (Lightwood)
Allocasuarina luehmannii (Bulloak)
Allocasuarina verticillata (Drooping Sheoak)

Shrubs and groundcovers e.g.
Acacia acinacea (Gold-dust Wattle)
Acacia rubida (Red-stemmed Wattle)
Bursaria spinosa (Sweet Bursaria)
Dodonea viscosa subsp. *angustissima* (Narrow-leaf Hop-bush)



PLAN 1:4000

-  Existing vegetation to be retained
-  Proposed native vegetation buffer
-  PV Array
-  Asset Protection Zone (APZ) / Fire break – 10m width



SECTION 1:500 @ A3 Section graphical illustration indicative growth 5 – 8 years

Photomontages



a) Existing undeveloped view



b) Infrastructure superimposed (prior to screening and prior to 1.2km radius setback being implemented)



c) Infrastructure superimposed with vegetation screening

Figure 6-7 Existing, original infrastructure and views mitigated with setback and landscaping for Orange Grove Gardens