Modification 1 Application

Walla Walla Solar Farm

August 2021

Project Number: 21-200

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Acronyms and abbreviations

AC	Alternating current
EIS	Environmental impact statement
EP&A Act	*Environmental Planning and Assessment Act 1979* (NSW)
km	kilometres
LGA	Local Government Area
m	metres
MW	Megawatt
O&M	Operations and Maintenance
PPA	Power Purchase Agreement
PV	Photovoltaic
SSD	State Significant Development

1. Introduction

1.1 Approved Project

The Walla Walla Solar Farm is located off Benambra Road, approximately 2.6 kilometres (km) west of the Olympic Highway in the Greater Hume Local Government Area (LGA) as shown in Figure 1-1.

The Development Consent was approved by the Independent Planning Commission of NSW (IPC) on 27 November, 2020 (Application Number: SSD 9874) under Section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (NSW).

The existing consent permits the construction, operation and decommissioning of a 300 MW AC ground-mounted photovoltaic (PV) solar farm and associated infrastructure.

Key development and infrastructure components include:

- Approximately 700,000 PV solar arrays mounted on single axis tracking systems.
- Approximately 76 modular inverter units.
- New TransGrid substation and connection point comprising transformers, associated switchgear, control and protection equipment.
- 33 kV/330 kV transformer and protection.
- Internal access tracks, Operations and maintenance (O&M) building, parking and perimeter fencing.
- Vegetative screening and setbacks.

The Environmental Impact Statement (EIS) was completed in 2019 by NGH Pty Ltd (NGH) (NGH Pty Ltd, 2019). The EIS was placed on public exhibition between 1 November 2019 and 2 December 2019.

The approved project layout is shown in Figure 1-2.

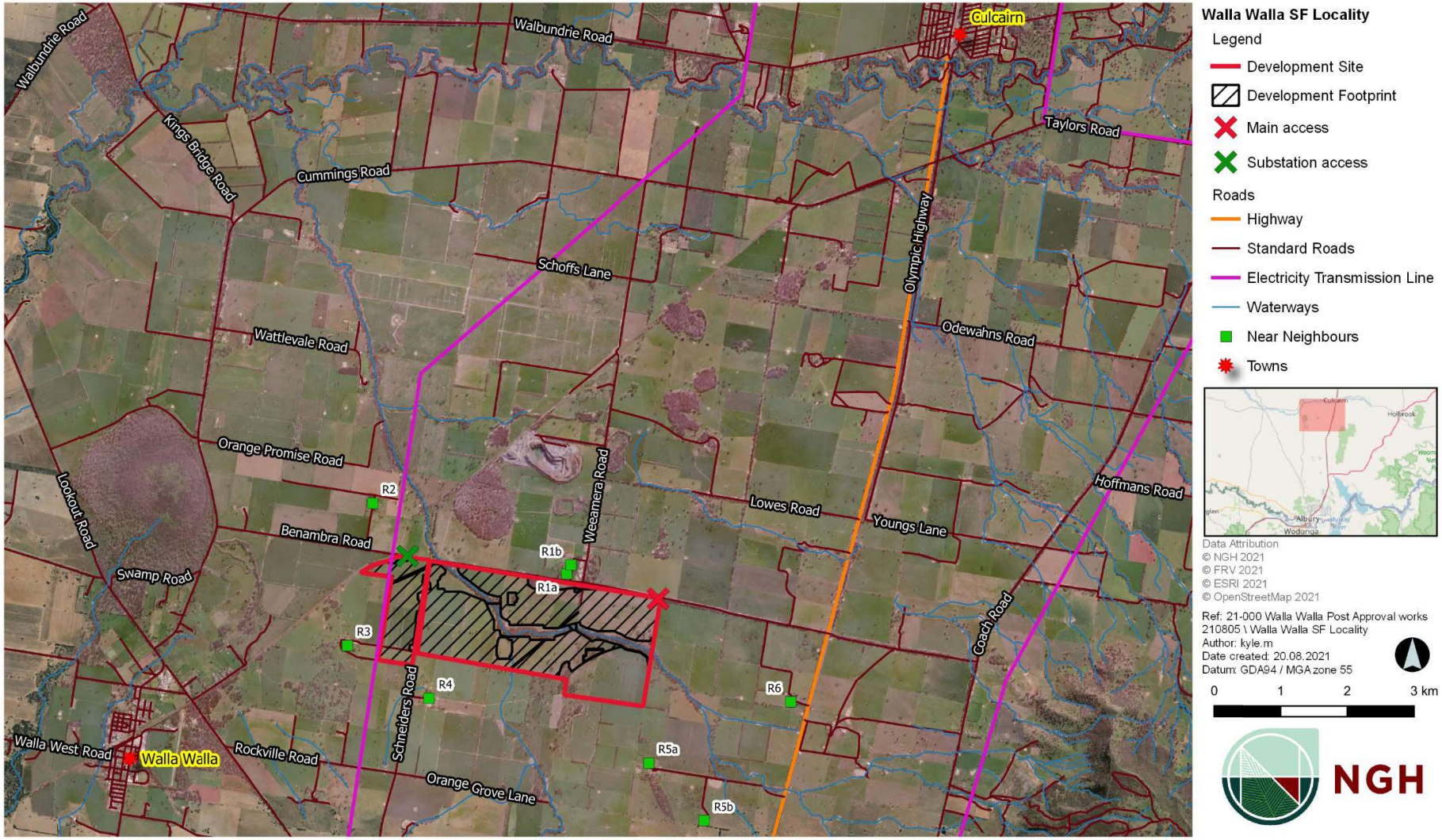

Figure 1-1 Location of the Walla Walla Solar Farm

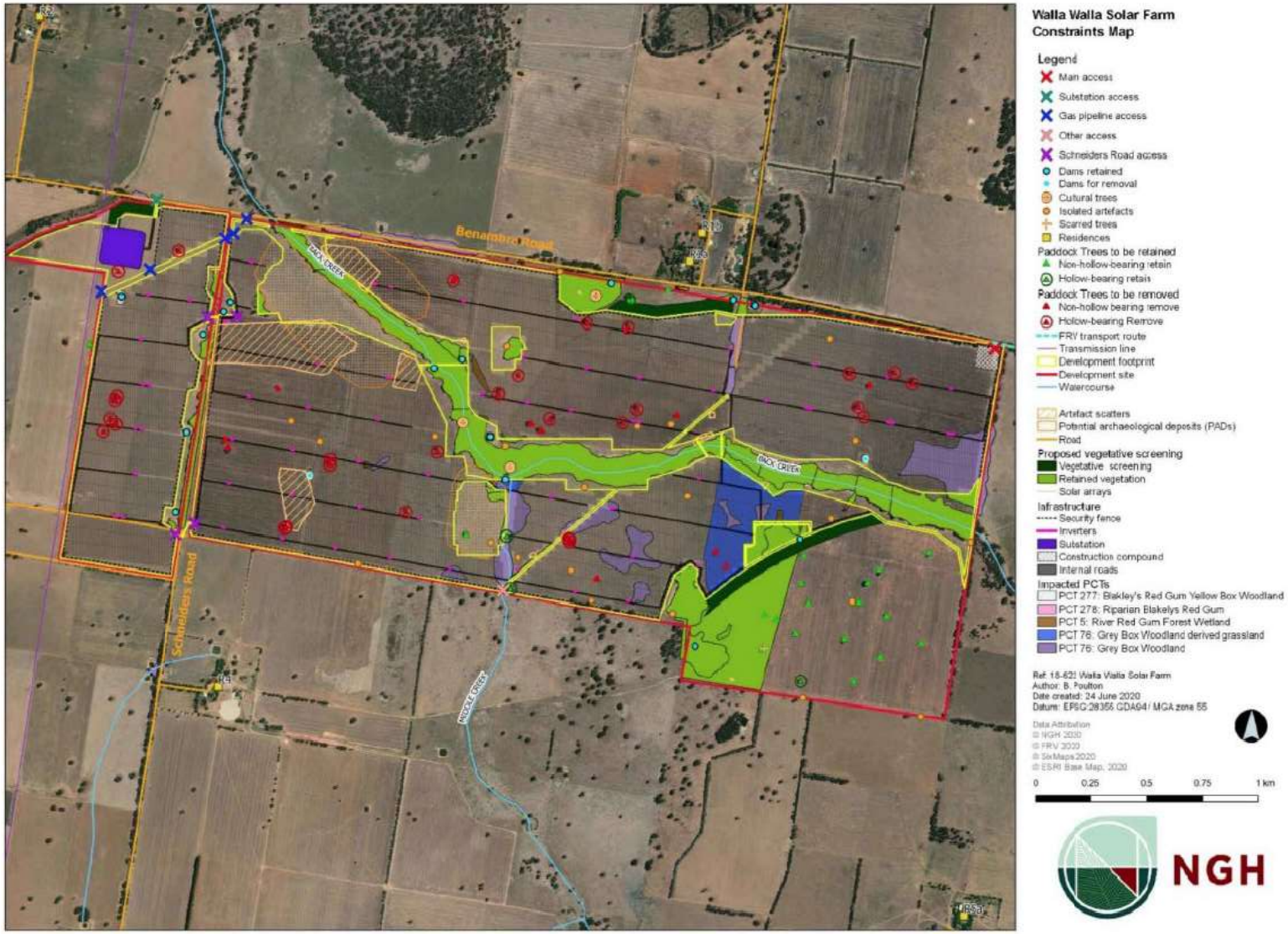

Figure 1-2 Approved project layout

1.2 The Proponent

Walla Walla Solar Farm Pty Ltd has been established by FRV. FRV is a global renewable energy solutions provider and leading solar developer. With a strong presence in Australia, FRV has a portfolio of successful solar projects currently operating and under development across the country. FRV's most recent solar farm, the Goonumbla Solar Farm in New South Wales (NSW), began electricity production in August 2020.

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 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 implemented significant design changes to the proposal in developing the approved project.

2. Proposed Modification

2.1 Modification Overview

This report has been prepared to support an application to modify Development Consent SSD 9874. It includes:

- Legislative context for the Modification Application. Section 3
- Details of the consultation undertaken in relation to the proposed modification Section 4
- Modification details Section 5
- Assessment of potential additional impacts Section 6

This report has been prepared by NGH Pty Ltd (NGH) on behalf of the proponent, Walla Walla Solar Farm Pty Ltd.

2.2 Changes Proposed and justification

During detailed design, Walla Walla Solar Farm Pty Ltd have identified three aspects of the consented project that require amendment. The proposed amendments (Modification) are:

- An increase in the maximum height of solar modules from 4m to 4.85m.
- An increase in the maximum height of substation transmission towers from 21m to 36m.
- An amendment to the construction access and transport route for construction traffic associated with construction of the substation.

All other solar farm infrastructure proposed remains as described in the Development Consent. The project size remains the same at 300 MW. No changes to the project boundary, development footprint or other infrastructure heights (including inverters) are required.

Primarily, the Modification is required to allow:

- During detailed design, and as a result of improving technology, increasing the approved maximum height of solar panels to 4.85m would allow the project to improve efficiencies within the site, increasing renewable power generation, decreasing the likelihood of future technology and infrastructure upgrades and thus avoiding potential resource use, and ensuring the financial viability of the project.
- Safe clearance distances of the transmission poles in accordance with Australian and TransGrid Standards. This requires six 30m poles (217A and 217D) and two 36m poles (217B and 217C) (Figure 5-1).
- TransGrid to undertake construction of the substation prior to other aspects of the solar farm being constructed, including access tracks. As such, the only viable way to access the proposed sub-station site access (herein referred to as the alternate access), is from Benambra Road to the west of Schneiders Road.

3. Statutory Context

3.1 NSW Approval

Development Consent for the project was provided by the Independent Planning Commission of NSW on 27 November, 2020 (Application Number: SSD 9874) under Section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (NSW).

3.2 Consistency with Existing Approval

A review of the modifications against the conditions of consent was undertaken (refer Appendix A) to determine:

- Whether the changes proposed would be substantive changes to the Project's nature or description.
- Whether the changes proposed would have a material change to predicted environmental impacts.
- Whether the changes proposed would impact on the ability to meet any Development Consent.

The review (refer Appendix A) concluded that:

- The changes proposed would not substantively change the Project. The Project would still involve the construction, operation and decommissioning of a 300 MW AC ground-mounted photovoltaic (PV) solar farm and associated infrastructure. The changes would not alter the project footprint, distance to receivers or alter any other infrastructure heights. The Project remains 'substantially the same development' and would enable the project to meet the Project objectives, as stated in the EIS (NGH Pty Ltd 2019). In particular the increased efficiency and capacity would increase the ability of the Project to:
    - Provide a clean and renewable energy source to assist in reducing Greenhouse Gas emissions.
    - Assist the NSW and Australian Governments to meet Australia's renewable energy targets and other energy and carbon mitigation goals.
- No material changes to the predicted environmental impacts were identified as supported by the closer investigation of traffic and visual impacts in addendum impact assessments. Minor additional traffic would utilise the alternate construction access, and visual impacts to sensitive receivers are slightly altered. Traffic and visual impacts can be managed and minimised with existing traffic management measures and vegetation screening.
- Regarding the ability to meet the Development Consent:
    - The changes generally correspond to mapped 'proposed infrastructure', and this is noted as indicative in the EIS.
    - Obligation to minimise harm to the environment is maintained.
    - An amendment to Schedule 3 Condition 5 and 6 is required to allow substation construction related traffic to use Benambra Road west of the main site access and utilise the substation access during construction prior to development of the remainder of the solar farm.

3.3 Modification Application

Following discussions with DPIE, the proponent was advised that the modification would be assessed by the Department under section 4.55(2) of the EP&A Act.

Under Section 4.55 of the EP&A Act, an SSD Development Consent can be modified where the:

> "*development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted*".

In determining an application for a modification under section 4.55 of the EP&A Act, the consent authority must consider such matters referred to in section 4.40 (4.15) as are relevant to the development. These matters include the likely impacts of the proposed amendments to the Development Consent, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.

Modifications are allowed that are 'substantially the same development'. Section 1(A) and Section 2 of Clause 4.55 differ regarding whether the proposed modification is of minimal environmental impact or not.

As per Section 3.2 and Appendix A the proposed changes within this Modification Application would not substantially change the project and would involve minimal environmental impact and, as such, be appropriately assessed under Section 4.55 of the EP&A Act.

4. Community and Stakeholder Engagement

The following consultation has occurred to support this Modification Application.

The Applicant will undertake the following additional consultation as part of the Modification assessment:

- Consulting with uninvolved landowners on Benambra Road who have visibility of the Project prior to screening.
- Consulting with Council in relation to the proposed use of unsealed sections of Benambra Road.
- Consulting with the broader community, via the Applicant's email database of interested parties, to advise on the modification and seek any feedback or comments.

4.1 Neighbour and Community Consultation

FRV has incorporated consultation of the proposed Modification as part of its ongoing engagement with neighbours and the broader community.

4.1.1 Adjacent neighbours

Three adjacent neighbours (R1, R2 and R5) were provided with detailed updates on proposed Modifications and invited to provide feedback. No other neighbours would have views to the project, and there are no other residences are situated along Benambra Road. As restrictions arising from public health orders surrounding COVID-19 prevented face to face consultation, the proponent consulted with neighbours online.

Many concerns raised related to the impacts of the approved development application, including Heat Island Effect, construction impacts, social impacts and economic impacts.

The potential for increased visual impact of the modification was raised by neighbours. Along with detailed discussions of what each Modification involved, FRV provided neighbours with updated photomontages from the perspective of their residences to enable them to consider and assess whether there would be an increase in visual impact. FRV will continue to engage with these neighbours throughout the Modification assessment process - specifically for the purposes of explaining proposed measures for mitigating visual impact - i.e. setbacks, vegetation buffers - and obtaining their input into how these measures are best delivered.

4.1.2 Wider Community

An email update was also produced and sent to subscribers on the Walla Walla Solar Farm email database. Similarly, recipients were invited to contact FRV to request further information on the Modifications or review Modification plans and reports on the DPIE Major Projects website. The Project website was also updated.

4.2 Greater Hume Shire Council

The proponent consulted with the General Manager of Greater Hume Shire Council on 3 August 2021 regarding the proposed modification and, in particular, the proposed use of unsealed sections of Benambra Road.

Council raised concern regarding the poor condition of the unsealed section of Benambra Road. Whilst this road is already used by local traffic and heavy vehicles, Council felt that the road would deteriorate further with additional project-related construction traffic. Council advised that whilst the upgrade of Benambra Road currently formed part of its Delivery Program, no firm dates or commitment had been made at this stage regarding to undertake these works.

The proponent highlighted that the existing conditions of consent required the proponent to maintain the road during construction, and restore the road following completion of construction activities. The proponent considered that, with these measures, and given the low number of project-related construction traffic, the road could be effectively managed without the need for road upgrades.

Council did not raise objection with FRV's approach to use the unsealed section of Benambra Road, as long as the condition of Benambra Road was maintained throughout the construction period, in accordance with the conditions of the development consent.

FRV will continue to update Council in respect to the project's Traffic Management Plan - including how it will mitigate impacts from the use of the western section of Benambra Road, should the Modification be approved.

5. Modification details

5.1 Substation design amendments – poles

Additional design amendments by TransGrid have identified the need for taller transmission poles than described in the EIS. In order to allow safe clearance distances in accordance with Australian and TG Standards, six 30m poles (217A and 217D) and two 36m poles (217B and 217C) are proposed to be installed (refer Figure 5-1). It should be noted that these poles would be equivalent in size to the existing transmission infrastructure.

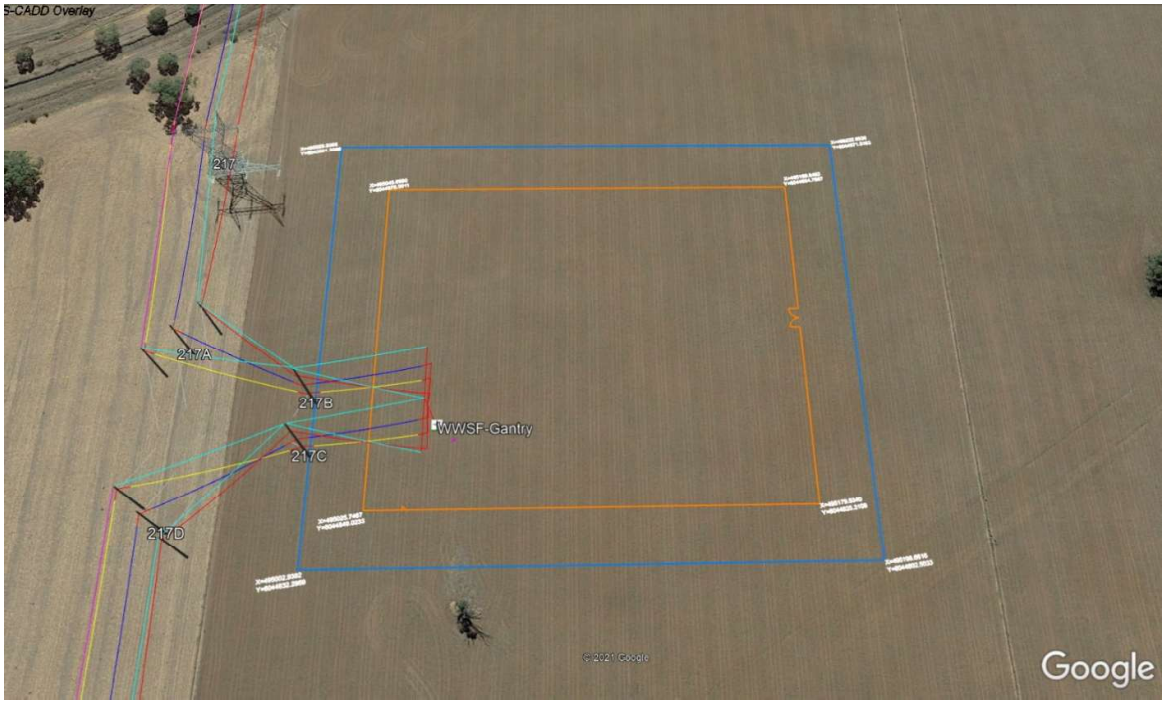

Figure 5-1 Walla Walla Substation transmission connections

5.2 Panel Height

The approved project included approximately 700,000 single axis tracker PV solar panels mounted in rows on steel frames with a typical maximum height of 4m, with rows spaced between 8m and 14m.

Project amendments during the final stages of the Department's assessment placed strain on the development's ability to produce its nameplate capacity, when offset distances for receiver R5a were increased from 800m to 1.8km. During detailed design, and as a result of improving technology, it was found that increasing the approved maximum height of solar panels to 4.85m would allow the project to improve efficiencies within the development site, ensuring the financial viability of the project. The new panels would not change the approved development footprint of 421ha, and previous commitments in relation to minimum setback distances from nearby receivers would be respected. However, depending upon the final panel configuration, the proposed spacing between panels may change to between 4.5m and 14m. The new panels would have a typical maximum height of 4.85m.

The modification would allow the use of newer, higher efficiency panels with a maximum height of 2400mm, arranged in a "two in portrait" orientation, as shown in Figure 5-2.

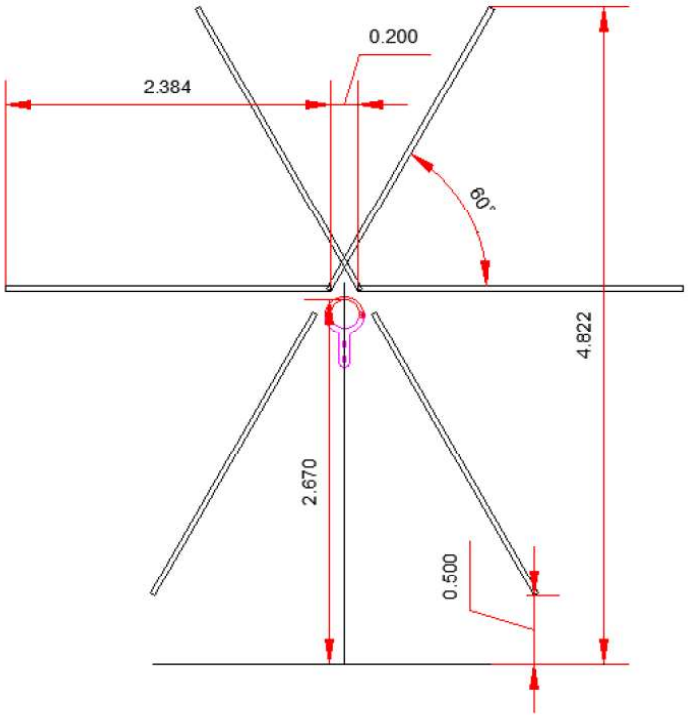

Figure 5-2 Profile of proposed solar array

Whilst the modification proposes to increase panel height by 85cm, it should be noted that panels would only be at their full, extended height for a period of approximately 30 minutes per day. In addition, FRV's investment in an active backtracking system would limit the amount of time that panels spent above 4m in height to approximately 2 – 3 hours at sunrise and 1 – 3 hours at sunset.

Solar backtracking is a tracking control program that aims to minimize PV panel-on-panel shading, by reducing the length of time that panels are in their fully extended position, thus avoiding production losses. Though the angle of the panels is not optimal, the loss from the off-angle is typically less than the loss that would result from shading the panels. The use of this technology would serve to reduce the visual magnitude of the proposed modification on surrounding receivers.

Whilst the modification proposes an increase in the height of solar panels, the maximum height of inverters would not change.

5.3 Substation Construction Transport and Access

The Modification seeks to modify the approved transport route for light and heavy vehicles associated with construction of the Substation as shown in Figure 5-2. Over-dimensional construction vehicle access along Benambra Road to the operational substation access is already permitted by the project consent. It is proposed that all heavy vehicles associated with construction of the substation would access the site via the Olympic Highway and Benambra Road, and continue along Benambra Road to the operational Substation Access.

System and asset planning by TransGrid has resulted in scheduling of the substation installation by TransGrid, ahead of construction for the remainder of the Walla Walla Solar Farm by FRV. A staging notification has been submitted separately to DPIE. This modification is required to allow the staged construction of the project.

The main access point and internal access roads identified in the approved project would not be available for substation construction access, as internal roads would not yet be constructed at the planned commencement of construction of the substation.

It is estimated that construction of the substation would result in a maximum of 10 heavy vehicles per day using Benambra Road (west of Weeamera Road) and the dedicated substation site access. There would be no increase to the overall vehicle movements as outlined in the condition 2 of Schedule 3 of the development consent. Traffic impacts would predominantly occur early in the construction period, for a period of approximately six months during civil works, and decrease once civil works have concluded. The substation access would not be used for the construction of the remainder of the site. All other traffic would continue to use the primary access in the northeast corner of the site, use internal access roads and cross Schneiders Road to access the western portion of the site.

5.4 Other Administrative changes

Condition 5 of Schedule 2 of the development consent prescribes minimum setback distances for solar farm infrastructure from receivers R1, R2 and R5. This includes a setback distance from R2 of at least 930m for all solar farm infrastructure, including the substation.

This condition was included by the IPC during its determination of the project to ensure the protection of setback distances from the neighbouring receivers.

Whilst the proponent fully respects setback distances that were committed to during the EIS, it is apparent that this condition by the IPC contains an error in setback distances from the position of solar farm infrastructure that has already received development approval.

Whilst a distance of 930m separates R2 from the solar array, the approved site layout shows the substation a distance of 900m from R2.

The proponent seeks the Department's assistance in rectifying this miscalculation by either:

- Removing the word 'substation' from condition 5 of Schedule 2; or
- Reducing the required offset distance from 930m to 900m.

We wish to highlight that the above incurs no change to the development footprint or layout, and would simply serve to correct minor errors in offset distances that have been recorded in the development consent for the approved project.

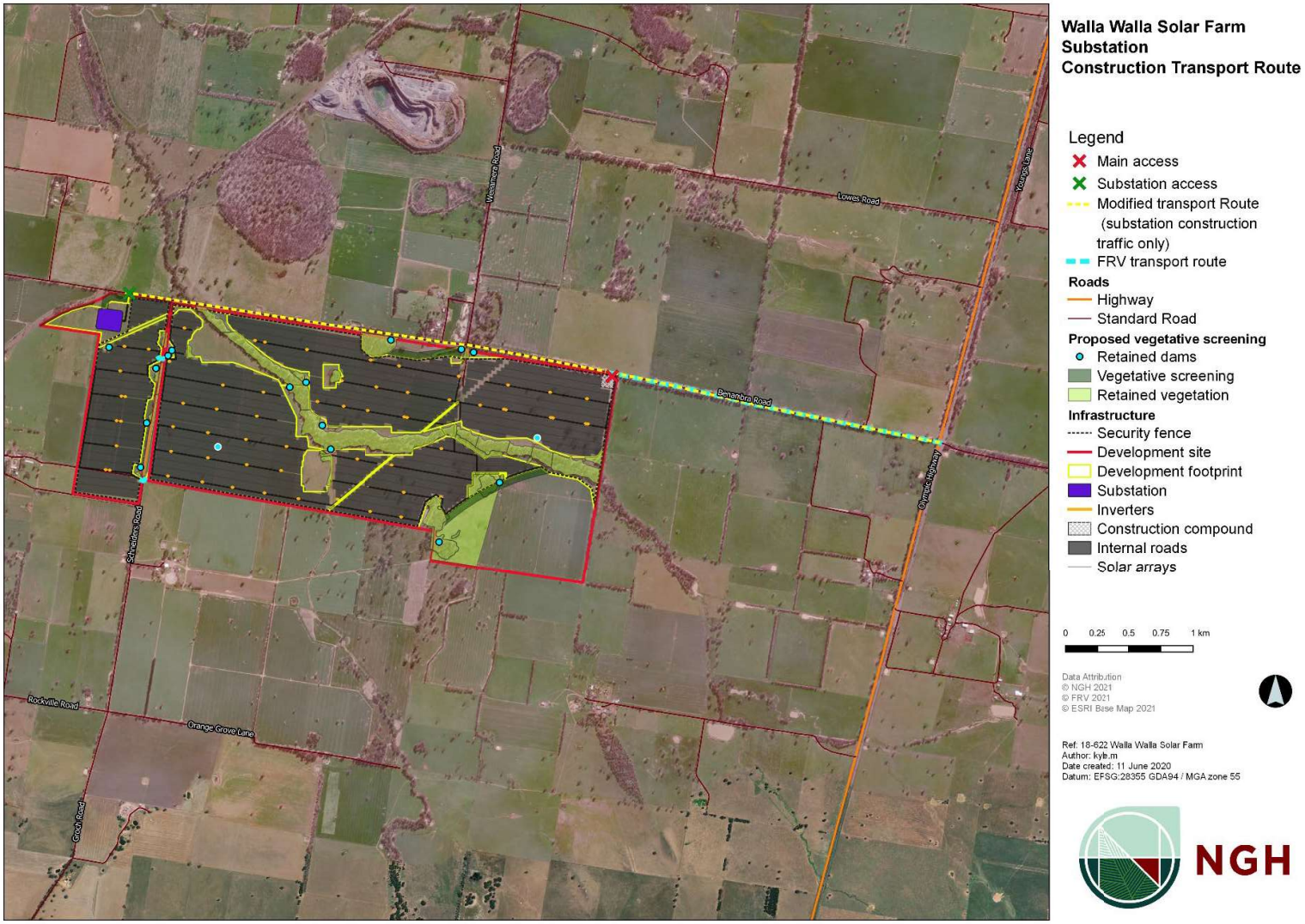

Figure 5-3 Walla Walla Solar Farm proposed modified access point for all traffic during substation construction

6. Environmental Assessment

A range of environmental risks were investigated within the EIS (and where relevant, with the Submissions Report and Amendment Report) for the approved Project.

All environmental risks investigated within the EIS prepared for the approved project were reviewed (refer Appendix A), with four considered relevant to the modification as reproduced in Table 6-1.

Visual and traffic impacts were investigated in greater detail, with specialist addendum reports included in Appendix B and summarised in the following subsection 6.1. Noise and dust impacts were considered potentially of concern but were found to be adequately addressed by existing mitigation measures.

Table 6-1 Summary of environmental risks of potential concern

Environmental risk (EIS Section)	Relevance to modified project	Impact
Visual (6.2)	The addendum visual impact assessment identified that the increase in height of the solar panels and height of substation power poles would have barely discernible increase in visibility and would not alter visual impact levels for receptors. Refer to summary Section 6.1.1 and Addendum Visual Impact Assessment (Appendix B.1).	Minimal impact
Noise and vibration (6.5)	The additional vehicles utilising Benambra Road would create minor additional noise impacts. These vehicles would only travel between the hours listed in the traffic management plan (to be drafted) and would be subject to traffic control measures such as speed limits to minimise unnecessary noise. Benambra Road is currently an operational road, and as such any noise impacts would not be considered beyond the current operational conditions of the road. No additional mitigation measures are required.	Minimal impact
Traffic, transport and road safety (6.6)	An additional 15 light vehicles and 10 heavy vehicles movements would be required to utilise the substation access per day during peak construction activity periods. All affected roads would continue to operate above a satisfactory level. Refer to summary Section 6.1.2 and Addendum Traffic Impact Assessment (Appendix B.2).	Minimal impact
Climate and air quality (7.1)	The additional vehicles utilising Benambra Road may create minor dust generation, however, dust mitigation measures would be applied along Benambra Road between Weeamara Road and the substation access as per the environmental conditions. No additional mitigation measures are required.	Minimal impact

6.1 Impacts requiring additional assessment

6.1.1 Visual Impacts

An addendum Visual Impact Assessment (Appendix B.1) based on the representative viewpoints identified in the EIS has been prepared to assess the visual impact of the increased height of infrastructure, with particular focus on receivers R1 (residences R1a and R1b), R2 and R5.

Landscape characteristics remains unchanged as do the scenic quality and sensitivities of viewpoints. The development footprint is also maintained with no change to proximities of the project to viewpoints.

Changes to the visibility of the modified proposal from increased panel and pole heights were reviewed to determine any changes to contrast requiring a change to the level of visual impact. Previous photomontages were updated for the viewpoints for receivers R1, R2 and R5 to assist review visibility and contrast ratings.

As summarised in Table 6-2 the proposed modifications would not result in a change to the previous medium or low visual impact ratings for residences or public viewpoints addressed in the EIS.

Table 6-2 Summary visual impact levels

Receiver / Viewpoint	Distance from Project Site	Distance from infrastructure	Approved Project	Proposed Modification	Comment
			Unmitigated / Residual Visual Impact Level		
R1a	80m	210m	High / Moderate	High / Moderate	Barely discernible change to visibility. No change to contrast and visual impact rating.
R1b	350m	485m			
R2	800m	900m	Moderate / Low	Moderate / Low	Slightly discernible change to visibility. No change to contrast and visual impact rating.
R5	800m	1,800m	Moderate / Low	Moderate / Low	Barely discernible change to visibility. No change to contrast and visual impact rating.
Changes to public viewpoints visibility are barely discernible and will not change residual impact level ratings.					

When compared to the approved project, the increase in panel height may be perceivable to receiver R1 following construction. However, the addendum visual impact assessment demonstrated the change would be minor and would not result in an increase in the visual impact rating.

In response to receiver R1's concerns regarding short term mitigation of visual impacts whilst on site vegetation screening is established, additional mitigation was offered to R1. Both on-curtilage landscaping and bunding part of the on-site vegetation buffer to provide greater visual mitigation were offered and is being considered by R1.

6.1.2 Traffic Impacts

An addendum Traffic Impact Assessment (Appendix B.2) has been prepared to assess the impacts of light and heavy movements on the unsealed section of Benambra Road, associated with substation construction traffic.

The Modification would result in additional minor traffic impacts to Benambra Road, between the Primary Site Access and Substation Access, however these are within existing road capacity as outlined in Table 6-3. No additional upgrades are proposed for Benambra Road or the project's Substation Site Access.

Table 6-3 Existing road capacity compared with predicted movements

Road	**Capacity** (movements per hour)	**Existing AM Peak Volume** (movements per hour)	**Estimated AM Peak Volume with proposed modification** (movements per hour[1])
Benambra Road west of Primary Site Access (sealed and unsealed)	600[2]	5	15 light vehicles 10 heavy vehicles
Benambra Road west of Schneiders Road (unsealed)		4	

[1]Assumes all estimated daily sub-station related construction vehicles travel to site in peak am period

[2]Assumes worst case assessed capacity of unsealed road 100m east and west of Schneiders Rd

The additional vehicles utilising Benambra Road would create minor additional noise impacts through changed construction traffic noise location, duration and extent. Construction vehicles would only travel between the hours listed in the traffic management plan (to be drafted) and would be subject to existing traffic control measures for the approved project such as speed limits to minimise unnecessary noise. Benambra Road is currently an operational road, and as such any noise impacts would not be considered beyond the current operational conditions of the road.

No additional traffic mitigation measures are required as a result of the proposed Modification.

7. Conclusion

The proposed modification involves:

- Increasing the maximum height of power poles for the onsite substation, from 21m to 36m.
- Increasing the maximum height of solar panels from 4m to 4.85m above ground level.
- Changes to the construction access and transport route for construction traffic associated with construction of the substation.

Walla Walla Solar Farm Pty Ltd is seeking an amendment under Schedule 3 to condition 5 and 6 to allow the TransGrid substation related construction traffic to use Benambra Road west of the main site and utilise the substation access during construction prior to development of the remainder of the solar farm.

The proposed modification is of negligible/minimal environmental impact and would be substantially the same development as the approved development.

The modified consent would allow TransGrid to implement planned delivery of the substation whilst the height increase of substation power poles would meet clearance distances in accordance with Australian and TransGrid Standards. The increased panel height would allow the recovery of lost capacity to more effectively meet project objectives to supply renewable energy to the community and market.

Appendix A Review of proposed modification against the development consent

A.1 Nature of the development

The proposed amendments are:

- An increase in the maximum height of solar modules from 4m to 4.85m.
- An increase in the maximum height of substation transmission towers from 21m to 36m.
- An amendment to the approved transport route for substation construction traffic.

All other solar farm infrastructure proposed remains as described in the Development Consent. The project size remains the same at 300 MW. No changes to the project boundary or development footprint are required.

The project remains 'substantially the same development' and will enable the project to meet the following project objectives as stated in the EIS (NGH Pty Ltd 2019):

A.2 Consideration of Environmental Impacts

The following risks were investigated within the EIS (and where relevant, with the Submissions Report and Amendment Report), completed for the approved project. Four of these are considered relevant to the modification and are discussed further in the Modification Application in Section 6. The assessment of visual and traffic impacts are supported by specialist studies in Appendix B.

Table A-1 EIS impacts investigated and relevance to modification

Environmental risk (EIS Section)	Relevance to modified project	
Visual (6.2)	The addendum visual impact assessment identified that the increase in height of the solar panels and height of substation power poles would have barely discernible increase in visibility and would not alter visual impact levels for receptors. Refer to summary Section 6.1.1 and Addendum Visual Impact Assessment (Appendix B.1).	Minimal impact
Land use (6.3)	The proposed modifications do not relate to land use and as such there would be no change to impacts. No additional mitigation measures are required.	No additional impact
Socioeconomic and community (6.4)	The proposed modifications do not relate to socioeconomic or community and as such there would be no change to impacts. No additional mitigation measures are required.	No additional impact
Noise and vibration (6.5)	The additional vehicles utilising Benambra Road would create minor additional noise impacts. These vehicles would only travel between the hours listed in the traffic management plan (to be drafted) and would be subject to traffic control measures such as speed limits to minimise unnecessary noise. Benambra Road is currently an operational road, and as such any noise impacts would not be considered beyond the current operational conditions of the road. No additional mitigation measures are required.	Minimal impact
Traffic, transport and road safety (6.6)	An additional 15 light vehicles and 10 heavy vehicles movements would be required to utilise the substation access per day during peak construction activity periods. All affected roads would continue to operate above a satisfactory level. Refer to summary Section 6.1.2 and Addendum Traffic Impact Assessment (Appendix B.2).	Minimal impact
Water use, quality (surface and groundwater) and hydrology (6.7)	The proposed modifications do not relate to water use, quality (surface and groundwater) or hydrology and as such there would be no change to impacts. No additional mitigation measures are required.	No additional impact
Biodiversity (6.8)	The proposed modifications do not relate to biodiversity and as such there would be no change to impacts. No additional mitigation measures are required.	No additional impact
Aboriginal heritage (6.9)	The proposed modifications do not relate to Aboriginal heritage and as such there would be no change to impacts. No additional mitigation measures are required.	No additional impact
Climate and air	The additional vehicles utilising Benambra Road may create	Minimal impact

Environmental risk (EIS Section)	Relevance to modified project	
quality (7.1)	minor dust generation, however, dust mitigation measures would be applied along Benambra Road between Weeamara Road and the substation access as per the environmental conditions. No additional mitigation measures are required.	
Historic heritage (7.2)	The proposed modifications do not relate to Historic heritage and as such there would be no change to impacts. No additional mitigation measures are required.	No additional impact
Soil (7.3)	The proposed modifications do not relate to soil and as such there would be no change to impacts. No additional mitigation measures are required.	No additional impact
Hazards (7.4)	The proposed modifications do not relate to fire or EMF hazards and as such there would be no change to impacts. No additional mitigation measures are required.	No additional impact
Resource and waste generation (7.5)	The proposed modifications do not relate to resource or waste generation and as such there would be no change to impacts. No additional mitigation measures are required.	No additional impact
Cumulative Impacts (7.6)	The proposed modifications would not result in any additional cumulative impacts. No additional mitigation measures are required.	No additional impact

A.3 Consideration of relevant Consent Conditions

With reference to the conditions of consent for the project, November 2020, the following area is identified for further consideration:

- The consented construction transport and site access requires amendment, to allow for substation construction traffic to use the substation access during construction.

Relevant conditions are evaluated below for their ability to impact on satisfying the existing Development Consent conditions.

Table A-2 Relevant development consent conditions

Consent reference		Can condition be met under the modification
Definitions	*The development, as described in the EIS*	Yes the Project is substantially the same
Schedule 2	5. Setback distances The Applicant must ensure that the solar panels, substation and inverters within the approved development footprint are not installed closer to the	No Development consent has been provided for the substation to be located at a distance of 880m from R2

<table>
<tr><th colspan="2">Consent reference</th><th>Can condition be met under the modification</th></tr>
<tr><td></td><td>receivers identified in column 1 of Table 1 than the offset distances identified in column 2 of Table 1.
Table 1: Development Offset Distance Requirements
<table>
<tr><th>Receiver</th><th>Offset distance</th></tr>
<tr><td>R1a</td><td>210 m</td></tr>
<tr><td>R1b</td><td>485 m</td></tr>
<tr><td>R2</td><td>930 m</td></tr>
<tr><td>R5a</td><td>1800 m</td></tr>
</table></td><td>The proponent seeks the Department’s assistance in rectifying this miscalculation by either:
• removing the word ‘substation’ from the condition; or
• reducing the required offset distance from 930m to 880m.
This does not alter any approved impacts.</td></tr>
<tr><td>Schedule 3</td><td>Site access
5. All vehicles associated with the development must enter and exit the site via the Main Access point on Benambra Road, as identified in Appendix 1.
6. Over-dimensional vehicles transporting substation components may also use the Substation Access point on Benambra Road, as identified in Appendix 1.</td><td>No.
Due to the staging of the project, all vehicles required for the construction of the substation would be required to use the Substation Access point. The number of the Over-dimensional vehicles transporting substation components would remain the same. However, an additional 15 light vehicles and 10 heavy vehicles movements would be required per day during peak activity periods.
This is considered a minimal impact.</td></tr>
<tr><td>Schedule 3</td><td>Visual
The applicant must:
(a) Minimise the off-site visual impacts of the development, including the potential for any glare or reflection;
(b) Ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape.</td><td>Yes.
The visual impact assessment identified that the increase in height of the solar panels and height of substation power poles would have barely discernible increase in visibility, glare or reflection. These off site impacts can be managed effectively by existing screening measures and would not alter visual impact levels for receptors. Consultation with impacted receivers has been undertaken to outline changes.
The modification would continue to minimise the off site visual impacts of the development and would ensure all infrastructure blends with the surrounding landscape as far as possible.</td></tr>
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