



Office of
Environment
& Heritage

DOC17/130706
SSD 8072

Mr Iwan Davies
Senior Planner
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Davies

Walgett Solar Farm Project (SSD 8095) - Exhibited EIS

I refer to your request dated 1 March 2017 seeking comment from the Office of Environment and Heritage (OEH) on the exhibited Environmental Assessment for the Walgett Solar Farm.

We have reviewed the information provided against our requirements sent to the Department of Planning and Environment on 1 December 2016 and our recommendations are provided in **Attachment A** and our detailed comments are provided **Attachment B**.

If you have any questions regarding this matter please contact Michelle Howarth on 02 6883 5339 or email michelle.howarth@environment.nsw.gov.au.

Yours sincerely

PETER CHRISTIE
Director North West
Regional Operations Division

6 April 2017

Contact officer: MICHELLE HOWARTH
02 6883 5339

ATTACHMENT A

OEH Recommendations

Walgett Solar Farm – Environmental Impact Statement

Acronyms

| | |
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| OEH | NSW Office of Environment and Heritage |
| BAR | Biodiversity Assessment Report |
| PCT | Plant Community Type |
| IBRA | Interim Biogeographical Regionalisation for Australia |

Recommendations:

1. The BAR be updated to provide justification that the vegetation west of the Barwon River in the outer assessment circle is non-native OR revise the mapping and update the landscape assessment of the project including reporting and credit calculation.
2. The BAR be updated to identify and map the strip of vegetation on the southern boundary of the proposed footprint, including identifying the PCT, site value and credits required.
3. Table 9 of the BAR be updated to include the full list of species known and predicted to occur in the IBRA subregion.
4. The BAR be updated to include maps that clearly identify all impacts. The BAR must include a map of PCT's requiring offsetting (at an appropriate scale).
5. OEH recommends detailed inspection of these areas during initial stages of the development as a safeguard against incidental harm to Aboriginal sites, particularly burials.

OEH Detailed Comments

Walgett Solar Farm – Environmental Impact Statement

Biodiversity

Areas of native vegetation have not been mapped in the assessment circles

The full extent of native vegetation in the outer assessment circle does not appear to have been mapped (Figure 3). OEH notes that areas of vegetation west of the Barwon River in the outer assessment circle have not been included in the area mapped as native vegetation.

Recommendation:

1. The proponent should reassess the extent of native vegetation and if required update the mapping and landscape assessment of the project including reporting and credit calculation.

Unmapped areas of native vegetation occur within the subject site

OEH note from aerial imagery that there is a strip of vegetation along the southern boundary of the area to be impacted, that has not been mapped in the BAR. The BAR states on page 24

'Native vegetation within the subject site is composed of patches of vegetation in an agricultural matrix. These isolated patches have heavy weed infestations, with some patches showing evidence of previous cropping and soil disturbance. This has prevented recruitment of native shrubs and eucalypts. The vegetation is therefore characterised by a canopy of mature and semi mature native trees over an understorey of mostly chenopod shrubs, exotic herbs and grasses.'

This suggests that the unmapped area contains native vegetation. All areas of native vegetation must be mapped as Plant Community Types (PCTs). The site value of the PCT and credits required must be determined using the credit calculator.

Recommendation:

2. The BAR be updated to identify and map the strip of vegetation on the southern boundary of the proposed footprint, including identifying the PCT, site value and credits required.

The full list of all candidate species has not been provided

As per table 20 in the FBA the BAR must include a list of candidate species, that are known or predicted to occur and justification for inclusions and exclusions based on habitat features. The list provided in Table 9 of the BAR is not a complete list of the known and predicted species within the IBRA subregion. The list should include species that were excluded based on habitat features and the reasons for exclusion.

Recommendation:

3. Table 9 of the BAR be updated to include the full list of species known and predicted to occur in the IBRA subregion.

The direct impacts to PCTs has not been mapped

The BAR does not provide a map that clearly identifies the native vegetation to be impacted. As a requirement of the FBA (Table 21) the impact assessment within the BAR must include a map of the PCT's that require offsetting.

Recommendation:

4. The BAR be updated to include maps that clearly identify all impacts. The BAR must include a map of PCT's requiring offsetting (at an appropriate scale).

Aboriginal Cultural Heritage

There is potential for Aboriginal burials to occur close to wetlands

OEH is concerned about the potential for subsurface Aboriginal objects particularly Aboriginal burials to occur adjacent to the areas identified as wetland in figure 2 of the BAR. Aboriginal burials are known to be strongly associated with areas close to rivers. We note that the closest point of the proposed development footprint is approximately 260 metres from the Barwon River (based on GIS analysis). Areas next to billabongs, such as the wetland that occurs on the south-west corner of the subject site and next to the Barwon River, may contain Aboriginal burials or other subsurface Aboriginal objects.

Recommendation:

5. OEH recommends detailed inspection of these areas during initial stages of the development as a safeguard against incidental harm to Aboriginal sites, particularly burials.