

Executive Director – Resource Assessments & Business Systems
NSW Department of Planning

Thursday, 25 May 2017
For Public Commentary

Attention: Iwan Davies,
Submission to EIS: SSD 8025 – Limondale Solar Farm

Maoneng Australia is an Australian solar farm investor, developer and operator. We are strongly supportive of the development of renewable energy, and in particular, solar developments, however we also understand the importance of upholding the responsibility of any development to address adverse environmental impacts.

Maoneng Australia, acting as development service provider for the Sunraysia Solar Farm has reviewed the Limondale Solar Farm EIS.

The submission enclosed within this letter highlights several concerns which we believe the proponent has not adequately addressed. The following issues which would be worthwhile for the relevant consultants to consider are:

- The shading impacts of the photovoltaic panels on vegetation
- Adequacy of Aboriginal Heritage Surveys, register searches and consultation with Aboriginal stakeholders:
 1. Whether cultural significance of the objects was considered, and not only scientific significance of the objects (p 81)
 2. The only Aboriginal person who appears to have attended the survey did not provide specific details or identify any particular locations (p 78)
 3. The locations of the two registered indigenous places listed on the Aboriginal Heritage Database were not identified and it is unclear whether the relevant consultant sought to confirm that these places were not within the Project site (p 85)
 4. The EIS notes that the assessments were of limited overall effectiveness due to visibility issues (p 80), and 11 new Aboriginal objects were located even in those conditions
 5. There is an active Native Title Claim registered over the subject Crown Land (claim reference NC2014/002) (p58)

6. There was a high degree of prediction that scarred trees would be located (p 79), but none appeared to have been found, and it is not clear whether for example, OEH's Scarred Trees Field Manual had been consulted
- Adequacy of the mitigation measures for Aboriginal heritage items given that all of the Aboriginal objects within the development footprint which are proposed to be impacted are of moderate scientific significance (p 81), and whether the relevant consultant considered the possibility of, for example, fencing, or providing a buffer for, those objects and rearranging the solar farm panels to accommodate the Aboriginal objects
 - Adequacy of the consideration of indirect impacts to native vegetation, threatened species and Aboriginal objects, for example, the impact of the removal of hollow bearing trees which may occasionally be utilised for foraging and nesting by the Major Mitchell's Cockatoo, a listed threatened species even though they are not "key" habitat (p 69)
 - Adequacy of mitigation measures for native vegetation including for example, the possibility of fencing around the 18 hollow bearing trees proposed to be removed (p 69)
 - Adequacy of noise mitigation measures, particularly during peak construction periods
 - Adequacy of mitigation measures for cumulative impacts identified at p 135 – 139, for example, whether the cumulative impacts for biodiversity have been adequately addressed through mitigation measures
 - Any consideration of waste issues.

Yours Sincerely,

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