



DOC18/354441  
SSD 8696

Natasha Homsey  
Environmental Assessment Officer  
Department of Planning and Environment  
Natasha.homsey@planning.nsw.gov.au

Dear Ms Homsey

### **Suntop Solar Farm environmental impact assessment**

Thank you for providing the Office of Environment and Heritage (OEH) with the opportunity to review the environmental impact assessment (EIA) for the proposed Suntop Solar Farm. OEH understands that the solar farm will cover an area of 472 hectares of cleared agricultural land and will also require widening of the intersection of Suntop Road and Renshaw McGirr Way.

While most of the site has already been cleared for agriculture, the proposal will require the removal of:

- 1.25 hectares of planted eucalypts
- Six isolated planted eucalypts (planted paddock trees)
- Twenty-five remnant paddock trees
- Ten roadside trees
- 0.04 hectares of Box-Gum woodland at the junction of Suntop Road and Renshaw – McGirr Way (road widening)

Plant community type 267 White Box – White Cypress Pine – Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion has been selected as the best fit for the native vegetation being assessed.

OEH has reviewed the EIS and in summary:

- Accepts the biodiversity assessment report
- The proponent should adhere to the “*Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010)” and consult more extensively with the Aboriginal community for information relating to the project area.

Detailed comments and recommendations are provided in **Attachment A**.

If you have any queries, please contact Liz Mazzer, Conservation Planning Officer on 6883 5325 or email [liz.mazzer@environment.nsw.gov.au](mailto:liz.mazzer@environment.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink that reads "Thomas Celebrezze". The signature is written in a cursive, flowing style.

**TOM CELEBREZZE**  
**Director Regional Operations**  
**North West**

28 June 2018

Contact officer: LIZ MAZZER  
6883 5325

## Attachment A

# OEH review of Suntop Solar Farm EIS

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## 1. Biodiversity assessment report

The biodiversity assessment report supporting the EIA has used the two streamlined modules of the biodiversity assessment method (BAM):

1. *Small area development that requires consent* for 1.25 hectares of planted eucalypts and 0.04 hectares of road widening (appendix 2 of BAM)
2. *Clearing paddock trees* for twenty-five remnant paddock trees, ten roadside trees and six isolated planted eucalypts (appendix 1 of BAM)

Accordingly, the proponent has used both the BAM calculator and the paddock tree calculator to determine the offset requirements for the project. This has resulted in the following credit requirements:

1. BAM calculator = 20 credits
2. Paddock tree calculator = 27.75 credits

The total credits required are 47.75 credits. The proponent intends to make a lump sum payment into the Biodiversity Conservation Trust Fund.

### Outcome:

OEH accepts the use of the streamlined modules for this assessment and calculation of offset requirements.

## 2. Aboriginal cultural heritage

The Aboriginal heritage assessment found two isolated artefacts located on the bank of a second order creek running through the site and a culturally significant tree located on the south-western boundary. The solar panels and associated infrastructure will avoid impacting the areas containing these three Aboriginal cultural heritage features.

OEH note that overall the site has been identified as having low archaeological potential due to a combination of factors including topography, agricultural activity, construction works and contemporary land disturbance.

OEH note that the Wellington LALC was engaged and have no objection to the proposed solar farm, provided that the cultural values identified are not impacted. However, the EIS has not presented or discussed the consultation process that occurred for the project with other Registered Aboriginal Parties (RAPs) as detailed in the "*Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*" (DECCW, 2010). OEH has a list of approximately 20 RAPs that may hold cultural knowledge relevant to this development. Within this particular Aboriginal community, not all knowledge is held by the LALC members, and not all knowledge holders are associated with the LALC.

### Recommendation:

OEH recommends that the proponent consult more extensively with the Aboriginal community to ensure adequate consultation has occurred and not just rely of the LALC as the only source of information. The proponent should adhere to the "*Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*" (DECCW, 2010).