



DOC18/268585  
SSD 8658

Ms Natasha Homsey  
Environmental Assessment Officer  
Department Planning & Environment  
[natasha.homsey@planning.nsw.gov.au](mailto:natasha.homsey@planning.nsw.gov.au)

Dear Natasha

**Gunnedah Solar Farm (SSD 8658)- Public exhibition**

I refer to your email dated 20 April 2018 requesting that the Office of Environment and Heritage (OEH) provide comments on the Environmental Impact Statement (EIS) for the proposed Gunnedah Solar Farm Project.

OEH understands that the proposal involves the construction and operation of a 150 megawatt photovoltaic (PV) plant over an area of 304 ha, with associated access roads, substation, transmission line and cabling.

We have reviewed the information provided against our requirements sent to the Department of Planning and Environment on 10 August 2017. Our comments and recommendations are provided in **Attachment A**.

If you have any questions regarding this matter, please contact Erica Baigent on 02 6883 5311 or email [erica.baigent@environment.nsw.gov.au](mailto:erica.baigent@environment.nsw.gov.au).

Yours sincerely

**PETER CHRISTIE**  
**Director Regional Operations**  
**North West**

18 May 2018

Contact officer: ERICA BAIGENT  
02 6883 5311

**ATTACHMENT A****OEH Detailed Comments****Gunnedah Solar Farm – Environmental Impact Statement**

---

The EIS presents conflicting information on the impact of the proposal on native vegetation.

**Recommendations:**

The proponent should:

1. Resolve the contradictory information in the EIS and confirm the extent of the proposed impacts on the site on native vegetation and threatened species habitat.
2. Update the threatened species assessment to include details of the nearby common planigale record and evaluate the likelihood of this species occurring on the solar farm site.

**Comments:**

The proponent has not completed the biodiversity assessments in accordance with the Framework for Biodiversity Assessment (FBA), as required by the Secretary's Environmental Assessment Requirements (SEARs) for the project.

The FBA specifies that<sup>1</sup>:

- Areas that are not native vegetation do not require further assessment, except where they are assessed as habitat for threatened species according to section 6.4 of the FBA.
- If the assessor determines that:
  - a) A vegetation zone has a site value score of 17 or less; and
  - b) The PCT present in the vegetation zone is not listed as a critically endangered or endangered ecological community,

Then no further assessment of native vegetation, or assessment of threatened species that can be predicted by habitat surrogates ('ecosystem credits') is required for that zone. However, assessment of threatened species that cannot be predicted by habitat surrogates (ie 'species credit' species) is still required in accordance with section 6.4 and section 6.5 of the FBA.

The Gunnedah Solar flora assessment<sup>2</sup> states that no native vegetation on the site will be directly or indirectly impacted by the project, and that all areas of disturbance will be confined to cropping land. On that basis the flora assessment concludes that a Biodiversity Assessment Report (BAR) under the FBA is not required. Instead, the proponent presents what they describe as 'traditional' flora and fauna assessments, using methods which do not fully conform with the FBA.

The flora assessment assigned Plant Community Types (PCTs) to native vegetation stands (named B1, B7 and B9) on the lots to be impacted by the solar farm. The assessor has matched all three areas of native vegetation to PCTs equivalent to endangered ecological communities (EECs). No shapefiles, plot data or site value scores have been provided.

Conflicting information is presented on whether the proposal will impact the native vegetation mapped on the site. Whilst the flora assessment states that none of the identified native vegetation on the site

---

<sup>1</sup> Sections 3.3.1.3, 5.1.1.3, 5.3.1.5, 9.4 and 9.5 of the Framework for Biodiversity Assessment.

<sup>2</sup> Pitt and Sherry (2018) *Gunnedah Solar Farm Flora Assessment*. Prepared by KMH Environmental (Pitt & Sherry) for Gunnedah Solar Farm Pty Ltd. Dated 8 February 2018.

will be impacted, the fauna assessment refers to the removal of trees, stating that *'the main cumulative impact associated with the proposal is the loss of the 15 trees in field B1'* (page 20). The fauna assessment proposes replacing the trees lost from field B1 by selective replanting in the buffer zones around the site (page 24). The flora assessment considers the B1 vegetation zone to conform with the listings for three different EECs.

Both the flora assessment and the fauna assessment present a brief assessment of the likelihood of a range of threatened species to occur within the development site.

The flora assessment concludes that two threatened grass species (species credit species) have 'moderate' potential to occur in the native woodland remnants on the site. The fauna assessment concludes that the native vegetation on the site may provide habitat for seven threatened species, two of which are species credit species. Page 13 of the fauna assessment notes that an additional species credit species, the common planigale (*Planigale maculata*), was detected in a survey by North West Ecological on an adjoining property in 2011. However, the fauna assessment does not present any further details of this record nor evaluates the likelihood of the common planigale occurring on the solar farm site.

If native vegetation is being impacted by the proposal, or the proposal will impact habitat components assumed or known to be used by species credit species, further assessment which conforms with the FBA will be required to determine whether a biodiversity offset is necessary.

## Aboriginal Cultural Heritage

### Recommendation:

3. The proponent must 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)<sup>3</sup>

### Comment:

OEH believes that the consultation with the local Aboriginal community has not been adequate. OEH has a list of over 70 Registered Aboriginal Parties (RAP's) that may hold Cultural knowledge relevant to this development. The proponent has only consulted with the 1 RAP, the Local Aboriginal Land Council (LALC). Within this particular Aboriginal community, not all knowledge is held by the LALC members, and not all knowledge holders are associated with the LALC.

---

<sup>3</sup> <http://www.environment.nsw.gov.au/licences/consultation.htm>