



Our ref: DOC20/464841

Senders ref: SSD 9874

Mr Rob Beckett
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Planning and Assessment
Department of Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Via email: rob.beckett@environment.nsw.gov.au

24 June 2020

Dear Mr Beckett

Subject: Walla Walla Solar Farm (SSD 9874) – Response to supplementary information

Thank you for your request dated 15 June 2020 regarding supplementary information for the Walla Walla Solar Farm (SSD 9874) Response to Submissions (RTS), seeking comments from the Biodiversity and Conservation Division (BCD) of the Department of Planning, Industry and Environment (the Department).

We have reviewed the 'Biodiversity further response' and 'Amended Biodiversity Development Assessment Report (BDAR)' (V1.4b, 26 May) against the BCD submissions dated 2 December 2019 regarding the exhibited EIS and our response to the RTS dated 23 April 2020.

BCD considers that outstanding biodiversity issues have largely been resolved. We note the following:

- The vegetation integrity score for Zone 4 has been lowered to zero. Information for the proponent about the BCD approach to assessing impacts of solar panel arrays on native biodiversity is in **Attachment A**.
- Vegetation zone numbering and impact areas are now generally consistent between the submitted digital dataset, revised BDAR and the BAM-C calculator case. Summary Table 10.5 (page 117) still needs to be updated.
- The revised development footprint does not appear to include consideration of security fence construction outside the 10 m asset protection zone.
- The mapped extent of the north-east corner of the proposal site appears to impinge on the road reserve.

BCD considers that the revised BDAR is compliant with the Biodiversity Assessment Method (BAM) and that the EIS **does** meet the Secretary's requirements for biodiversity, contingent on the following conditions:

1. *Construction and materials laydown areas for security fencing must be within existing cleared areas and inside the approved development footprint.*
2. *Any clearing outside the proposal site must be assessed according to the BAM.*

All plans required as a Condition of Approval that relate to biodiversity should be developed in consultation with and to the satisfaction of BCD, to ensure that issues identified in our EIS and RTS responses and this submission are adequately addressed.

If you have any questions about this advice, please contact Miranda Kerr, Senior Biodiversity Conservation Officer, via rog.southwest@environment.nsw.gov.au or 02 6022 0607.

Yours sincerely



Andrew Fisher
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ATTACHMENT A – BCD advice to proponent regarding impacts of solar panel arrays on native biodiversity

ATTACHMENT A BCD advice to proponent regarding impacts of solar panel arrays on native biodiversity

We thank NGH for providing the information about the recovery of understorey grasses at another solar farm. BCD would welcome any information relevant to understanding direct and indirect impacts of solar panel arrays on native biodiversity in the NSW context, and are particularly interested in the outcomes of scientifically designed monitoring with associated pre-construction sampling.

Records of threatened fauna inhabiting solar farms are interesting however the application of this type of information to a BAM assessment is less useful without knowing the threatened species habitats existing before construction. Any reduction in condition due to a development needs to be adequately offset to compensate for the range of threatened species habitat provided by the proposal site. Photos of native species growing beneath panels also need to be accompanied by comparable pre-development vegetation data and evidence about species diversity and representation of plant functional groups in the community from which the grassland was derived.

We would need to see the written outcomes of stratified and repeatable ecological sampling, at least replicating pre-construction BAM vegetation integrity plots, but preferably full floristic data tailored to assessing changes in ecological function. The study would ideally be designed to include consideration of impacts such as shading on species diversity (for example, less sunlight and slightly changed water regime may favour broad-leaved species and lead to an increase in weeds with a subsequent decrease in native forb abundance), concentration of rainfall and rain shadows beneath the panels, soil erosion potential in storm events, temperature changes beneath the panels, and changes to specific habitat requirements for threatened species.

Other aspects of the site management during operation would also need to be resolved for us to be confident that biodiversity values could be retained. For example, our response to the RTS identified that another section of the EIS stated the panel array area would be sown with clover and maintained at 15 cm high. A site manager implementing that approach in a zone with future integrity score of more than zero may inadvertently remove biodiversity values that were not offset by the BAM.

In the absence of publicly available scientific evidence, BCD will maintain a precautionary approach to assessing the impact of solar panel arrays on native biodiversity.