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Shane Melotte: 0429 778 080

08/08/19

Nicole Brewer
Assistant Director
Resources and Energy Assessments
Department of Planning Industry & Environment
GPO Box 39 Sydney 2001

Dear Ms Brewer,

RE: Suntop Solar Farm Modification 1 (SSD-8696-MOD-1) Request for Additional Information

We write in response to your letter dated 2nd August 2019 requesting additional information with respect to the proposed Suntop Solar Farm modification application. Please find our responses detailed below.

Request 1: Address TransGrid's request for a further relocation of the substation and clarify the impacts of a revised location.

In response to feedback from TransGrid, the substation and switchgear/auxiliary building areas have been moved approximately 50 metres southeast from their position shown in the submitted Modification Plans. The purpose of this further relocation of the substation is to ensure TransGrid do not require the creation of a further powerline easement between the substation and the existing 132kV powerline easement. The change requested by TransGrid is shown in Figure 1 and outcome from this change is shown in Figure 2 below.

An full set of relevant updated plans reflecting this change have been provided with this letter in replacement of the respective plans submitted with the Modification Application. The environmental impacts of the further revision of the substation in comparison with the assessment of the proposed Modification impacts are considered in Table 1 below for reference.

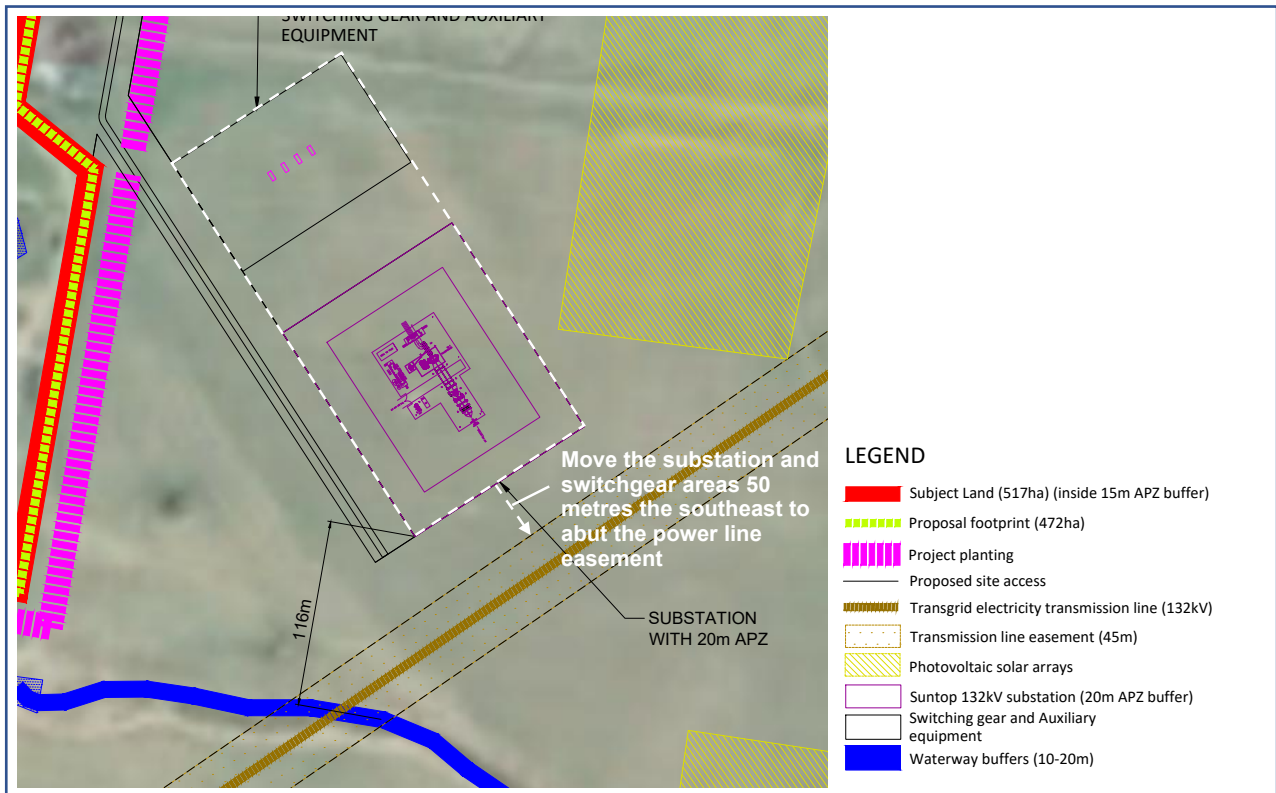


Figure 1: Plan of requested relocation of Substation

The resultant layout from making the requested change by TransGrid is shown in Figure 2 below for reference. The setback between the powerline easement and the substation area boundary has been removed. The arrangement of the substation and the switching gear/auxiliary building areas remain unchanged.

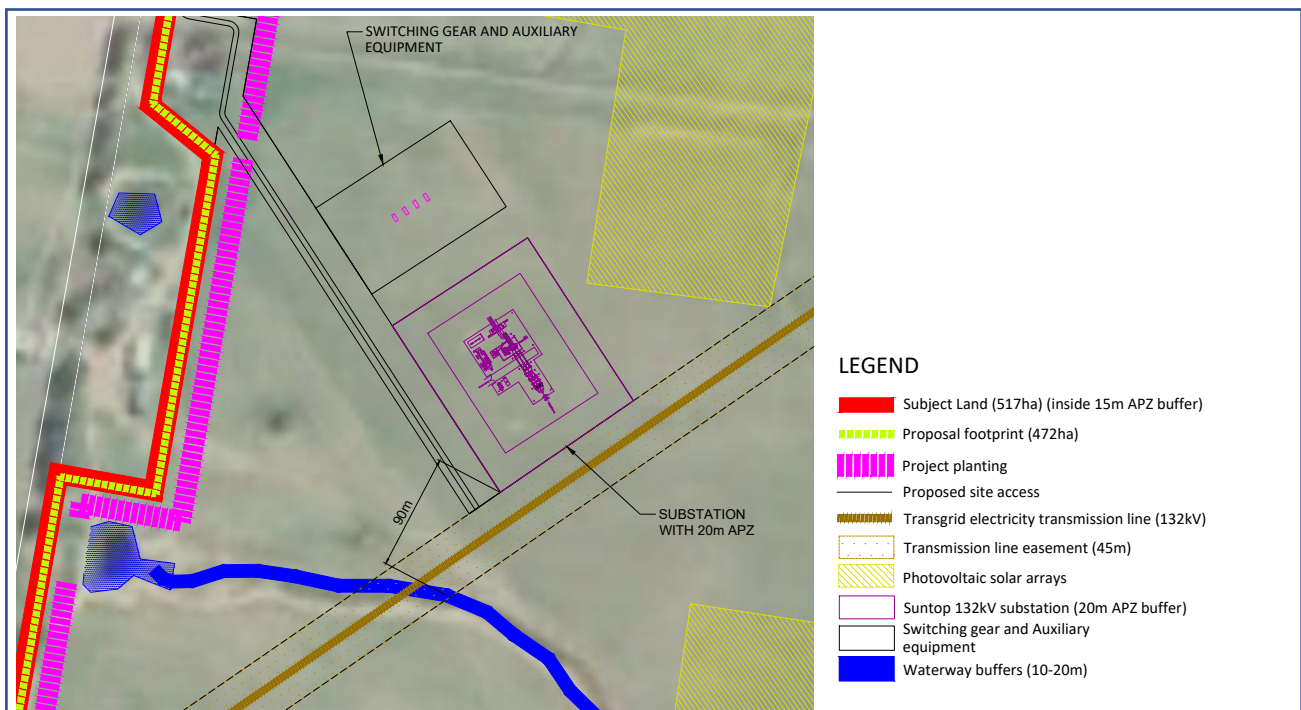


Figure 2: Outcome of substation relocation as requested by TransGrid

Table 1: Environmental Impact Assessment of further revised substation location

Issue	Modification Assessment	Environmental Impact	Assessment of further change requested by TransGrid (substation relocation)
Land	<p>The proposed modification occupies an area that is entirely within the approved development footprint. The substation relocation is largely occupying an area that is shown as a solar field area in the approved general layout. In the proposed layout, only part of the substation security fence extends outside of what was originally an indicative solar field area. It is noted the Development Consent requires the final detailed plans be submitted to the Secretary, including any details of siting of solar panels and ancillary infrastructure.</p> <p>This modified layout shows the substation in the proposed new location. Approval of this layout is required to continue with the grid connection and other development activities for the project and allow for appropriate setbacks for the substation as required by TransGrid. The potential additional two - six shipping container scale buildings within the "Switching gear and auxiliary equipment" are within the footprint of the approved development and will not require any significant increase in the level of excavation than already contemplated by the approved development. In addition, these works will be further set away from the existing waterway on site.</p> <p>A further detailed design layout will be submitted to the Department for approval prior to the commencement of works on the site in accordance with Schedule 2, Condition 5 of the Suntop Solar Farm Development Consent.</p> <p>The proposed modification does not alter potential impacts to land resources beyond those assessed within the original Environmental Impact Assessment.</p>	No increased impact	<p>The further revision to the substation still occupies an area that is entirely within the approved development footprint. A small section of the substation will now sit outside of the area that was indicatively a solar field (subject to final detailed design), this area is clear, relatively flat farmland and setback approximately 90 metres from the waterway.</p> <p>No change to impact or impact assessment resulting from further revision to the substation location.</p>
Biodiversity	The proposed modification occupies a footprint that is generally within the approved project footprint, with a small	No increased impact.	There is no native vegetation in the area impacted by this further revision. The entire area is within the development

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	<p>section of the substation and the substation access road projecting south of the indicative solar field in the approved layout. The proposed position for the substation relocation will not impact on any existing native vegetation and will be set further away from existing native vegetation than the approved substation location.</p> <p>Biodiversity impacts of the project development footprint were assessed as part of the Environmental Impact Statement including a Biodiversity Assessment Report (BAR) prepared by Flora Search (May 2018). A copy of this BAR report is attached to this Modification Application at Appendix 5 for reference. Page 17 of this BAR includes a plan that details the location of the native vegetation paddock trees to be removed as part of the development. This includes 3 trees to the immediate south west of the proposed new location for the substation (Two <i>Callitris columellaris</i> trees and one <i>Eucalyptus albens</i> tree).</p> <p>Furthermore, the insertion of aerial imagery into the updated Substation Layout at Appendix 2 provides further evidence that no additional native vegetation will be impacted by the proposed modification application.</p> <p>The BAR also calculates the appropriate offset credits based on the appropriate Biodiversity Assessment Method (BAM) which remains unchanged as a result of the proposed modification application.</p> <p>This report confirms that there is no other native vegetation located in the new substation location that will be impacted by the modification. There are no other aspects of the proposed modification that would change the biodiversity impacts of the development footprint assessed under the BAR.</p> <p>The additional landscaping along the western boundary will provide opportunity to deliver additional biodiversity outcomes above and beyond the approved development.</p>		<p>footprint. No change to impact or impact assessment resulting from further revision to the substation location.</p>

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Heritage	The proposed modification has no impact on known historic heritage values of the site identified in the Aboriginal Heritage Assessment undertaken as part of the Environmental Impact Assessment for the project.	No increased impact.	No change to impact or impact assessment resulting from further revision to the substation location.
Transport	<p>The proposed modification does not alter site access or transport arrangements or traffic volumes associated with the project. It is noted that the proposed relocation will improve internal access arrangements for the substation including avoiding the need to traverse the existing waterway as per the approved development.</p> <p>The improved substation access will reduce complexities with respect to transporting key substation components such as the transformer to the substation site.</p>	Reduced impact.	No change to impact or impact assessment resulting from further revision to the substation location.
Visual	<p>In considering the visual impacts of the proposed substation relocation it was determined necessary to re-issue relevant photomontages based on the modified layout to understand the potential impacts and also revisit the visual impacts on each of the sensitive receivers reviewed as part of the Visual Impact Assessment prepared for the project. The specialist consultants who prepared the photomontages and Visual Impact Assessment (Cambium Group and Envisage Consultants) were re-engaged to undertake this work.</p> <p>Updated photomontages for the potentially affected sensitive receivers and an assessment of the proposed modification against the original Visual Impact Assessment are provided in Appendix 4 for reference.</p> <p>The summary of findings is as follows: <i>"The proposed modification to the substation location would result in two private viewpoints (VP13 and VP38) seeing the substation whereas previously they had no view of the approved substation. However, both viewpoints are distant (over approximately 2.5km away), and the substation is still on lower-lying land</i> </p>	No increased impact.	The proposed further revision to the substation location slightly increases the setback of the substation and switchgear/auxiliary building area from the nearest sensitive receiver. In addition, the further revision will not result in a substantive change to the overall height of this infrastructure as the move is a relatively short distance and generally moving along the same contour line and the site will be levelled in this area to allow for the substation bench. On this basis it is not considered the visual impact assessment provided with the modification requires any revision and there will be no increase in visual impacts from the submitted modification application.

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	<p><i>with trees in the foreground along the property boundary. At this distance the substation would be barely perceptible from other solar farm infrastructure and would not be prominent in the view, and therefore, the original rating given for these viewpoints has not changed.</i></p> <p><i>From the public viewpoint (VP Suntop Road) there would also be views of the substation whereas previously there was no view. However, locations from Suntop Road with views to the substation are very limited, and only the top few metres of the substation would be seen. Therefore, the original rating given for this viewpoint has not changed.</i></p> <p><i>The only other viewpoint that would see the proposed modified substation is VP1, which already viewed the approved substation. Overall the revised proposal does not represent a substantial change to the approved proposal when viewed from this residence, and therefore, the original rating has not changed. To further mitigate the visual impact to VP1 in the longer term, additional landscaping has been proposed along the western boundary closest to the substation in consultation with this landholder. Over time this landscape planting would break-up views of the substation in addition to the screening originally proposed, however, the taller elements of the substation would remain visible."</i></p> <p>In addition to the above, it is noted the assessment completed by Envisage did not result in any changes to impact level for any of sensitive receivers when comparing the approved development with the proposed modification.</p> <p>It is also noted the additional vegetation screening will further mitigate any increased visibility of the substation from the sensitive receiver to the immediate west. Furthermore, the land to the immediate west is now the basis for the proposed and associated Suntop 2 Solar Farm.</p> <p>On this basis it is concluded that the modification will not result in any net increase in impacts on the sensitive</p>		

Issue	Modification Assessment	Environmental Impact	Assessment of further change requested by TransGrid (substation relocation)
	receivers associated with the proposed development.		
Water	<p>The proposed modification does not alter the potential impacts to water resources or aquatic ecology as assessed within the Environmental Assessment. The increased setback from the watercourse will ensure that environmental impact is reduced. The revised location is not positioned within a waterway and natural drainage line.</p> <p>The substation relocation is also determined to be less prone to any salinity impacts than the approved location and therefore will not require the same level of protection and mitigation measures with respect to salinity risks.</p>	Reduced impact.	The substation will move approximately 50 metres closer to the waterway however still represents a net increase in setback from the waterway when compared with the originally approved General Layout Plan. The further revision to the substation layout does not increase risks to the waterway such as erosion or runoff can still be readily managed with the standard construction and operation mitigation measures (required by the Conditions in the Development Consent).
Noise	<p>The proposed modification does not alter the potential noise impacts as assessed within the Environmental Assessment. The substation in the proposed new location will remain substantially set away from the nearest sensitive receiver.</p> <p>In addition, this nearest sensitive receiver is now the subject of the associated Suntop 2 Solar Farm EIS.</p>	No increased impact.	The further revision to the substation slightly increases the setback from the nearest sensitive receiver. No change to impact or impact assessment resulting from further revision to the substation location.
Hazards	The proposed modification does not alter the potential hazards as assessed within the Environmental Assessment. The substation relocation will increase the buffer of the substation from existing native vegetation on site and will be further setback from the site boundary and the waterway.	No increased impact	No change to impact or impact assessment resulting from further revision to the substation location.
Subdivision	The proposed subdivision relocates the lot for the substation and creates an access easement to the substation for TransGrid. This will not have any adverse environmental impacts and is necessary for substation asset to be transferred into the ownership of TransGrid. A three-lot subdivision was submitted and assessed as part of the original Environmental Impact Assessment process for Suntop Solar Farm and created a Lot that is smaller than 400 Hectares to allow the excision of farm buildings on the site along with	No increased impact	No change to impact or impact assessment resulting from further revision to the substation location.

Issue	Modification Assessment	Environmental Impact	Assessment of further change requested by TransGrid (substation relocation)
	<p>a lot for the substation in its original area. This modification is simply relocating the substation lot, slightly increasing the size and creating the access easement to benefit the ultimate owner of the substation (TransGrid).</p> <p>The subdivision will only proceed should the development of the solar farm go ahead and therefore will not result in any unreasonable fragmentation of rural land.</p> <p>In addition, the modification proposes to update Schedule 2 of the Development Consent to formalise consent of the subdivision by way of a specific condition. The subdivision has already been assessed as part of the EIS and the proposed changes will not result in any additional environmental and land-use impacts.</p> <p>It is understood that whilst the subdivision condition would formally allow the subdivision, the applicant would still be required to obtain a Subdivision Certificate through Dubbo Regional Council.</p>		

Based on the above assessment it is not considered the proposed further revision of the substation location will result in any materially increase environmental impacts than those detailed in the original EIS and the Modification submission. In addition, the development is considered to remain substantially the same development as the originally approved development.

The updated plans attached with this letter have been submitted to TransGrid for review and comment. TransGrid have subsequently advised via email that the changes in the updated plans meet their requirements. A copy of this email is attached to this response for reference.

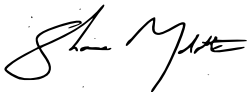
Request 2: Clarify the interaction of the proposed internal road to the substation and the dwelling on Lot 3.

The interaction of the proposed internal substation and the existing dwelling on the subject site (Lot 3 of the subdivision) is as follows:

- The substation road may provide access to the existing vacant residential building, this will be determined in the final detailed design and will be influenced any decision to retain this building on site.
- The vacant residential building may potentially be used as a site office during construction/operation or it will be demolished.
- The vacant residential building will not be used as residential dwelling as part of the proposed Suntop Solar Farm development at any point, including during its construction, operation and decommissioning.

If you have any queries regarding the additional information and assessments, please contact Shane Melotte on 0429 778 080.

Regards

A handwritten signature in black ink, appearing to read 'Shane Melotte', with a stylized flourish at the end.

Shane Melotte - Director

Thursday, August 8, 2019 at 11:47:35 AM Australian Eastern Standard Time

Subject: Fwd: Updated Plans for Suntop Substation
Date: Thursday, 8 August 2019 at 10:09:35 am Australian Eastern Standard Time
From: Chelsea Milles
To: Shane Melotte
Attachments: image001.png, image482534.png

Hi Shane

Please see below.

Thanks

Chelsea

Chelsea Milles
Project Development Manager, Energy Group



Canadian Solar (Australia) Pty Ltd.
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From: Snehal Patel <Snehal.Patel@transgrid.com.au>
Sent: Thursday, August 8, 2019 9:16:36 AM
To: Chelsea Milles <chelsea.milles@canadiansolar.com>
Subject: RE: Updated Plans for Suntop Substation

Hi Chelsea,

TG confirms that the revise site plan drawings for Suntop Solar Farm are in line with our understanding of the substation land adjoining the existing transmission line easement.

Thank you very much for sending these through.

Regards,

Snehal Patel
0449 126 917 | 02 9284 3274
snehal.patel@transgrid.com.au

From: Chelsea Milles <chelsea.milles@canadiansolar.com>
Sent: Wednesday, 7 August 2019 5:08 PM
To: Snehal Patel <Snehal.Patel@transgrid.com.au>
Subject: Updated Plans for Suntop Substation

Hi Snehal

Page 1 of 2