

Appendix A: Secretary's Environmental Assessment Requirements and Agency Comments





Cédric Bergé
Environmental Consultant – Development Manager
ESCO Pacific Pty Ltd
Level 4, 13 Cremorne Street
Richmond VIC 3121

Dear Mr Bergé

Wyalong Solar (SSD 9564) Environmental Assessment Requirements

I have attached the Environmental Assessment Requirements for the preparation of an Environmental Impact Statement (EIS) for the Wyalong Solar Farm.

The requirements are based on the information you have provided to date, and have been prepared in consultation with the relevant government agencies. The agencies comments are attached for your information (see Attachment 2).

Please note that the Department may alter these requirements at any time, and that you must consult further with the Department if you do not lodge a development application and EIS for the project within the next two years.

If your proposal contains any actions that could have a significant impact on matters of National Environmental Significance, then it will also require approval under the Commonwealth's *Environment Protection Biodiversity Conservation Act 1999* (EPBC Act).

This approval is in addition to any approvals required under NSW legislation. If you have any questions about the application of the EPBC Act to your proposal, you should contact the Department of the Environment in Canberra (6274 1111 or www.environment.gov.au).

Please contact the Department at least two weeks before you plan to submit the development application and EIS for the project. This will enable the Department to:

- confirm the applicable fee (see Division 1AA, Part 15 of the *Environmental Planning and Assessment Regulation 2000*); and
- determine the required number of copies of the EIS.

It is important for you to recognise that the Department will review the EIS for the project before putting it on public exhibition. If it fails to adequately address these requirements, you will be required to submit an amended EIS.

Finally, the development application must be accompanied by the consent in writing of the owner of the land (as required in clause 49(1)(b) of the *Environmental Planning and Assessment Regulation 2000*).

Yours sincerely

18/9/18

Clay Preshaw

Director

Resource & Energy Assessments

as nominee of the Secretary

Environmental Assessment Requirements

State Significant Development

Section 4.12(8) and 4.12(9) of the *Environmental Planning and Assessment Act 1979* and Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*

Application Number	SSD 9564
Proposal	Wyalong Solar Farm which includes: <ul style="list-style-type: none">• the construction and operation of a solar photovoltaic (PV) generation facility with an estimated capacity of 130 MW; and• associated infrastructure, including a grid connection and battery storage.
Location	Approximately 7 km north-east of West Wyalong, along the Newell Highway in the Bland Shire Council local government area.
Applicant	ESCO Pacific
Date of Issue	18 September 2018
General Requirements	<p>The Environmental Impact Statement (EIS) for the development must comply with the requirements in Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i>.</p> <p>In particular, the EIS must include:</p> <ul style="list-style-type: none">• a stand-alone executive summary;• a full description of the development, including:<ul style="list-style-type: none">– details of construction, operation and decommissioning;– a site plan showing all infrastructure and facilities (including any infrastructure that would be required for the development, but the subject of a separate approvals process);– a detailed constraints map identifying the key environmental and other land use constraints that have informed the final design of the development;• a strategic justification of the development focusing on site selection and the suitability of the proposed site with respect to potential land use conflicts with existing and future surrounding land uses (including other proposed or approved solar farms, rural residential development and subdivision potential);• an assessment of the likely impacts of the development on the environment, focusing on the specific issues identified below, including:<ul style="list-style-type: none">– a description of the existing environment likely to be affected by the development;– an assessment of the likely impacts of all stages of the development, (which is commensurate with the level of impact), including any cumulative impacts of the site and existing or proposed developments (including the proposed West Wyalong Solar Farm), taking into consideration any relevant legislation, environmental planning instruments, guidelines, policies, plans and industry codes of practice;– a description of the measures that would be implemented to avoid, mitigate and/or offset the impacts of the development (including draft management plans for specific issues as identified below); and– a description of the measures that would be implemented to monitor and report on the environmental performance of the development;• a consolidated summary of all the proposed environmental management and monitoring measures, identifying all the commitments in the EIS; and• the reasons why the development should be approved having regard to:<ul style="list-style-type: none">– relevant matters for consideration under the <i>Environmental Planning and Assessment Act 1979</i>, including the objects of the Act and how the principles of ecologically sustainable development have been incorporated in the design, construction and ongoing operations of the development;

	<ul style="list-style-type: none"> – the suitability of the site with respect to potential land use conflicts with existing and future surrounding land uses; and – feasible alternatives to the development (and its key components), including the consequences of not carrying out the development. • a detailed consideration of the capability of the project to contribute to the security and reliability of the electricity system in the National Electricity Market, having regard to local system conditions and the Department's guidance on the matter. <p>The EIS must also be accompanied by a report from a suitably qualified person providing:</p> <ul style="list-style-type: none"> – a detailed calculation of the capital investment value (CIV) (as defined in clause 3 of the Regulation) of the proposal, including details of all assumptions and components from which the CIV calculation is derived; and – certification that the information provided is accurate at the date of preparation. <p>The development application must be accompanied by the consent in writing of the owner/s of the land (as required in clause 49(1)(b) of the Regulation).</p>
Specific Issues	<p>The EIS must address the following specific issues:</p> <ul style="list-style-type: none"> • Biodiversity – including: <ul style="list-style-type: none"> – an assessment of the biodiversity values and the likely biodiversity impacts of the project in accordance with Section 7.9 of the <i>Biodiversity Conservation Act 2016</i> (NSW), the Biodiversity Assessment Method (BAM) and documented in a Biodiversity Development Assessment Report (BDAR), unless OEH and DPE determine that the proposed development is not likely to have any significant impacts on biodiversity values; – the BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the BAM; and – an assessment of the likely impacts on listed aquatic threatened species, populations or ecological communities, scheduled under the <i>Fisheries Management Act 1994</i>, and a description of the measures to minimise and rehabilitate impacts; • Heritage – including an assessment of the likely Aboriginal and historic heritage (cultural and archaeological) impacts of the development, including consultation with the local Aboriginal community in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i>; • Land – including: <ul style="list-style-type: none"> - an assessment of the potential impacts of the development on existing land uses on the site and adjacent land, including: <ul style="list-style-type: none"> ○ a consideration of agricultural land, flood prone land, Crown lands, mining, mineral or petroleum rights (including Exploration Licence 8430); ○ a soil survey to determine the soil characteristics and consider the potential for erosion to occur; and ○ a cumulative impact assessment of nearby developments; - an assessment of the compatibility of the development with existing land uses, during construction, operation and after decommissioning, including: <ul style="list-style-type: none"> ○ consideration of the zoning provisions applying to the land, including subdivision, and; ○ completion of a Land Use Conflict Risk Assessment in accordance with the Department of Industry's <i>Land Use Conflict Risk Assessment Guide</i>; and

	<ul style="list-style-type: none"> - a description of measures that would be implemented to remediate the land following decommissioning in accordance with <i>State Environmental Planning Policy No 55 - Remediation of Land</i>. • Visual – including an assessment of the likely visual impacts of the development (including any glare, reflectivity and night lighting) on surrounding residences, scenic or significant vistas, air traffic and road corridors in the public domain, including a draft landscaping plan for on-site perimeter planting, with evidence it has been developed in consultation with affected landowners; • Noise – including an assessment of the construction noise impacts of the development in accordance with the <i>Interim Construction Noise Guideline</i> (ICNG), and cumulative noise impacts (considering other developments in the area), and a draft noise management plan if the assessment shows construction noise is likely to exceed applicable criteria; • Transport – including: <ul style="list-style-type: none"> - an assessment of the peak and average traffic generation, including over-dimensional vehicles and construction worker transportation; - an assessment of the likely transport impacts to the site access route (including Newell Highway and Mid-Western Highway), site access point, rail safety issues, any Crown land, particularly in relation to the capacity and condition of the roads; - a cumulative impact assessment of traffic from nearby developments (including cumulative impacts from West Wyalong Solar Farm); - a description of any proposed road upgrades developed in consultation with the relevant road and rail authorities (if required); and - a description of the measures that would be implemented to mitigate any transport impacts during construction; • Water – including: <ul style="list-style-type: none"> - an assessment of the likely impacts of the development (including flooding) on surface water and groundwater resources (including drainage channels, wetlands, riparian land, farm dams, groundwater dependent ecosystems and acid sulfate soils), related infrastructure, adjacent licensed water users and basic landholder rights, and measures proposed to monitor, reduce and mitigate these impacts; - details of water requirements and supply arrangements for construction and operation; and - a description of the erosion and sediment control measures that would be implemented to mitigate any impacts in accordance with <i>Managing Urban Stormwater: Soils & Construction</i> (Landcom 2004); • Hazards and Risks – including: <ul style="list-style-type: none"> - a preliminary risk screening in accordance with <i>State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33</i> (DoP, 2011), and if the preliminary risk screening indicates the development is “potentially hazardous”, a Preliminary Hazard Analysis (PHA) must be prepared in accordance with <i>Hazard Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis</i> (DoP, 2011) and <i>Multi-Level Risk Assessment</i> (DoP, 2011); and - an assessment of all potential hazards and risks including but not limited to bushfires, spontaneous ignition, electromagnetic fields or the proposed grid connection infrastructure; • Socio-Economic – including an assessment of the likely impacts on the local community and a consideration of the construction workforce accommodation; and • Waste – identify, quantify and classify the likely waste stream to be generated during construction and operation, and describe the measures
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	to be implemented to manage, reuse, recycle and safely dispose of this waste.
Consultation	<p>During the preparation of the EIS, you should consult with relevant local, State or Commonwealth Government authorities, infrastructure and service providers, community groups, affected landowners, exploration licence holders, quarry operators and mineral title holders (including Argent Minerals).</p> <p>In particular, you must undertake detailed consultation with affected landowners surrounding the development and Bland Shire Council.</p> <p>The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p>
Further consultation after 2 years	If you do not lodge a development application and EIS for the development within 2 years of the issue date of these EARs, you must consult further with the Secretary in relation to the preparation of the EIS.
References	The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans as identified. While not exhaustive, the following attachment contains a list of some of the guidelines, policies, and plans that may be relevant to the environmental assessment of this proposal.

ATTACHMENT 1

Environmental Planning Instruments, Policies, Guidelines & Plans

Biodiversity	Biodiversity Assessment Method (OEH) Threatened Species Assessment Guidelines - Assessment of Significance (OEH) Biosecurity Act 2015 Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (DPI) Policy and Guidelines for Fish Habitat Conservation and Management (DPI) Fisheries Management Act 1994
Heritage	Aboriginal Cultural Heritage Consultation Requirements for Proponents (OEH) Code of Practice for Archaeological Investigations of Objects in NSW (OEH) Guide to investigating, assessing and reporting on aboriginal cultural heritage in NSW (OEH). NSW Heritage Manual (OEH)
Land	Primefact 1063: Infrastructure proposals on rural land (DPI) Establishing the social licence to operate large scale solar facilities in Australia: insights from social research for industry (ARENA) Local Land Services Act 2013 Australian Soil and Land Survey Handbook (CSIRO) Guidelines for Surveying Soil and Land Resources (CSIRO) The land and soil capability assessment scheme: second approximation (OEH) Land Use Conflict Risk Assessment Guide (DoI – L&W)
Noise	NSW Noise Policy for Industry (EPA) Interim Construction Noise Guideline (EPA) NSW Road Noise Policy (EPA)
Light	Dark Sky Planning Guideline: Protecting the observing conditions at Siding Spring (DPE)
Transport	Guide to Traffic Generating Developments (RTA) Austroads Guide to Road Design & relevant Australian Standards Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development
Water	Managing Urban Stormwater: Soils & Construction (Landcom) Floodplain Development Manual (OEH) Guidelines for Controlled Activities on Waterfront Land (DPI Water) Water Sharing Plans (DPI Water) Floodplain Management Plan (DPI Water) Guidelines for Watercourse Crossings on Waterfront Land (DPI Water)
Hazards and Risks	Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DPE) Multi-Level Risk Assessment (DPE)
Waste	Waste Classification Guidelines (EPA)
Electromagnetic Interference	ICNIRP Guidelines for limiting exposure to Time-varying Electric, Magnetic and Electromagnetic Fields

Environmental Planning Instruments

State Environmental Planning Policy (State and Regional Development) 2011

State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Rural Lands) 2008

State Environmental Planning Policy No. 44 – Koala Habitat Protection

State Environmental Planning Policy No. 55 – Remediation of Land

Bland Local Environmental Plan 2011



Iwan Davies
Resource and Energy Assessments, Planning Services
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001
Via email: iwan.davies@planning.nsw.gov.au

Dear Mr Davies

RE: Wyalong Solar Farm (SSD 9564) – request for input to Secretary's Environmental Assessment Requirements

I refer to your email dated 24 August 2018 to the Office of Environment and Heritage (OEH) seeking input into the Department of Planning and Environment (DPE) Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the proposed Wyalong Solar Farm (SSD 9564).

OEH has reviewed the Scoping Report (ESCO Pacific, 2018) for the project and provides SEARs for the proposed development in **Attachment A**. Guidance material is listed in **Attachment B**.

OEH recommends the EIS needs to appropriately address the following:

1. Biodiversity and offsetting
2. Aboriginal cultural heritage
3. Flooding

The EIS should fully describe the proposal, the existing environment and impacts of the development including the location and extent of all proposed works that may impact on ACH and biodiversity. The scale and intensity of the proposed development should dictate the level of investigation. It is important that all conclusions are supported by adequate data. The assessment must include all ancillary infrastructure associated with the project and Rural Fire Service requirements for asset protection.

Remnant vegetation is mapped in the south west corner of the proposed development, which also contains paddock trees. If it proposed to remove paddock trees the EIS should detail the value of paddock tree habitat to all threatened species known or likely to occur in the area and an assessment of the impacts of clearing those trees.

Please note that for projects not defined as pending or interim planning applications under Part 7 of the *Biodiversity Conservation (Savings and Transitional) Regulation 2017* the Biodiversity Assessment Methodology (BAM) must be used to assess impacts to biodiversity in accordance with the *Biodiversity Conservation Act 2016* (BC Act), unless the Planning Agency Head and the Environment Agency Head determine that the project is not likely to have any significant impact on biodiversity values.

The Scoping Report states that an extensive Aboriginal Heritage Information Management System (AHIMS) search was done and that no Aboriginal sites were known to exist within the activity area. No date was provided on the AHIMS search. OEH notes there are large parts of NSW that have not been subject to archaeological survey and as such there may be unrecorded Aboriginal sites within or near the project area.

An Aboriginal Cultural Heritage Assessment Report (ACHAR) will be required as part of the EIS. The ACHAR must demonstrate consultation in accordance with the 'Aboriginal cultural heritage consultation requirements for proponents 2010' (DECCW). Aboriginal cultural heritage values that exist across the whole area that will be affected by the development must be identified and documented in the ACHAR.

All Aboriginal objects identified must be reported to the OEH through registration on AHIMS in accordance with the mandatory notification requirements of section 89A of the *National Parks and Wildlife Act 1974*.

If you have any questions about this matter please contact Simon Stirrat on (03) 5051 6218 or at simon.stirrat@environment.nsw.gov.au.

Yours sincerely

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

ANDREW FISHER
Senior Team Leader Planning
South West Branch
Conservation and Regional Delivery Division
Office of Environment and Heritage

ATTACHMENT A – Standard Environmental Assessment Requirements for Wyalong Solar Farm (SSD 9564)

ATTACHMENT B – Guidance material

Attachment A – Standard Environmental Assessment Requirements for Wyalong Solar Farm (SSD 9564)

Sources of guidance material for terms in [blue](#) are in Attachment B

Biodiversity
1. Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the Biodiversity Conservation Act 2016 using the Biodiversity Assessment Method (BAM) and documented in a Biodiversity Development Assessment Report (BDAR) . The BDAR must include information in the form detailed in the Biodiversity Conservation Act 2016 (s6.12) , Biodiversity Conservation Regulation 2017 (s6.8) and the BAM, unless OEH and DPE determine that the proposed development is not likely to have any significant impact on biodiversity values.
2. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the BAM.
3. The BDAR must include details of the measures proposed to address the offset obligation as follows; <ol style="list-style-type: none"> The total number and classes of biodiversity credits required to be retired for the development/project; The number and classes of like-for-like biodiversity credits proposed to be retired; The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules; Any proposal to fund a biodiversity conservation action; Any proposal to make a payment to the Biodiversity Conservation Fund. If seeking approval to use the variation rules, the BDAR must contain details of the reasonable steps that have been taken to obtain requisite like-for-like biodiversity credits.
4. The BDAR must be submitted with all digital spatial data associated with the survey and assessment as per Appendix 11 of the BAM.
5. The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under s6.10 of the <i>Biodiversity Conservation Act 2016</i> .
Aboriginal cultural heritage
6. The EIS must identify and describe the Aboriginal cultural heritage values that exist across the whole area that will be affected by the development and document these in an Aboriginal Cultural Heritage Assessment Report (ACHAR). This may include the need for surface survey and test excavation. The identification of cultural heritage values must be conducted in accordance with the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (OEH 2010) , and be guided by the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011) and consultation with OEH regional branch officers.
7. Consultation with Aboriginal people must be undertaken and documented in accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW) . The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the ACHAR.

8. Impacts on Aboriginal cultural heritage values are to be assessed and documented in the ACHAR. The ACHAR must demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the EIS must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must be documented and notified to OEH.
9. The assessment of Aboriginal cultural heritage values must include a surface survey undertaken by a qualified archaeologist in areas with potential for subsurface Aboriginal deposits. The result of the surface survey is to inform the need for targeted test excavation to better assess the integrity, extent, distribution, nature and overall significance of the archaeological record. The results of surface surveys and test excavations are to be documented in the ACHAR
10. The ACHAR must outline procedures to be followed if Aboriginal objects are found at any stage of the life of the project to formulate appropriate measures to manage unforeseen impacts.
11. The ACHAR must outline procedures to be followed in the event Aboriginal burials or skeletal material is uncovered during construction to formulate appropriate measures to manage the impacts to this material.

Historic heritage

12. The EIS must provide a heritage assessment including but not limited to an assessment of impacts to *State and local heritage* including conservation areas, natural heritage areas, places of Aboriginal heritage value, buildings, works, relics, gardens, landscapes, views, trees should be assessed. Where impacts to State or locally significant heritage items are identified, the assessment shall:
 - a. outline the proposed mitigation and management measures (including measures to avoid significant impacts and an evaluation of the effectiveness of the mitigation measures) generally consistent with the NSW Heritage Manual (1996),
 - b. be undertaken by a suitably qualified heritage consultant(s) (note: where archaeological excavations are proposed the relevant consultant must meet the NSW Heritage Council's Excavation Director criteria),
 - c. include a statement of heritage impact for all heritage items (including significance assessment),
 - d. consider impacts including, but not limited to, vibration, demolition, archaeological disturbance, altered historical arrangements and access, landscape and vistas, and architectural noise treatment (as relevant), and
 - e. where potential archaeological impacts have been identified develop an appropriate archaeological assessment methodology, including research design, to guide physical archaeological test excavations (terrestrial and maritime as relevant) and include the results of these test excavations.

Flooding
<p>13. The EIS must map the following features relevant to flooding as described in the Floodplain Development Manual 2005 (NSW Government 2005) including:</p> <ol style="list-style-type: none"> Flood prone land. Flood planning area, the area below the flood planning level. Hydraulic categorisation (floodways and flood storage areas). Flood hazard.
<p>14. The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 5% Annual Exceedance Probability (AEP), 1% AEP flood levels and the probable maximum flood, or an equivalent extreme event.</p>
<p>15. The EIS must model the effect of the proposed development (including fill) on the flood behaviour under the following scenarios:</p> <ol style="list-style-type: none"> Current flood behaviour for a range of design events as identified in 11 above. This includes the 0.5% and 0.2% AEP year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.
<p>16. Modelling in the EIS must consider and document:</p> <ol style="list-style-type: none"> Existing council flood studies in the area and examine consistency to the flood behaviour documented in these studies. The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood. Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazards and hydraulic categories. Relevant provisions of the NSW Floodplain Development Manual 2005.
<p>17. The EIS must assess the impacts on the proposed development on flood behaviour, including:</p> <ol style="list-style-type: none"> Whether there will be detrimental increases in the potential flood affectation of other properties, assets and infrastructure. Consistency with Council Floodplain Risk Management Plans. Consistency with any Rural Floodplain Management Plans. Compatibility with the flood hazard of the land. Compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land. Whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site. Whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses. Any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the SES and Council. Whether the proposal incorporates specific measures to manage risk to life from flood. These matters are to be discussed with the SES and Council. Emergency management, evacuation and access, and contingency measures for the development considering the full range of flood risk (based upon the probable maximum

flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the SES.

- k. Any impacts the development may have on the social and economic costs to the community as consequence of flooding.

Attachment B – Guidance material

Title	Web address
<u>Relevant Legislation</u>	
<i>Biodiversity Conservation Act 2016</i>	www.legislation.nsw.gov.au/#/view/act/2016/63/full
<i>Commonwealth Environment Protection and Biodiversity Conservation Act 1999</i>	www.austlii.edu.au/au/legis/cth/consol_act/epabca1999588/
<i>Environmental Planning and Assessment Act 1979</i>	www.legislation.nsw.gov.au/maintop/view/inforce/act+203+1979+cd+0+N
<i>Fisheries Management Act 1994</i>	www.legislation.nsw.gov.au/maintop/view/inforce/act+38+1994+cd+0+N
<i>National Parks and Wildlife Act 1974</i>	www.legislation.nsw.gov.au/maintop/view/inforce/act+80+1974+cd+0+N
<i>Water Management Act 2000</i>	www.legislation.nsw.gov.au/maintop/view/inforce/act+92+2000+cd+0+N
<u>Biodiversity</u>	
Biodiversity Assessment Method (OEH 2017)	www.environment.nsw.gov.au/resources/bcact/biodiversity-assessment-method-170206.pdf
Threatened species - assessment of significance	www.environment.nsw.gov.au/research-and-publications/publications-search/threatened-species-assessment-guidelines
Guidance and Criteria to assist a decision maker to determine a serious and irreversible impact (OEH 2017)	www.environment.nsw.gov.au/resources/bcact/guidance-decision-makers-determine-serious-irreversible-impact-170204.pdf
Ancillary rules: biodiversity conservation actions	www.environment.nsw.gov.au/resources/bcact/ancillary-rules-biodiversity-actions-170496.pdf
Ancillary rules: reasonable steps to seek like-for-like biodiversity credits for the purpose of applying the variation rules	www.environment.nsw.gov.au/resources/bcact/ancillary-rules-reasonable-steps-170498.pdf
OEH Threatened Species Website	www.environment.nsw.gov.au/threatenedspecies/
NSW BioNet (Atlas of NSW Wildlife)	www.bionet.nsw.gov.au/
NSW guide to surveying threatened plants (OEH 2016)	www.environment.nsw.gov.au/resources/threatenedspecies/160129-threatened-plants-survey-guide.pdf
OEH threatened species survey and assessment guideline information	www.environment.nsw.gov.au/threatenedspecies/surveyassessmentguidelines.htm
BioNet Vegetation Classification – see NSW Plant Community Type (PCT) classification link for PCT database login page.	www.environment.nsw.gov.au/research/Vegetationinformationsystem.htm
OEH Data Portal (access to online spatial data)	http://data.environment.nsw.gov.au/
Fisheries NSW policies and guidelines	www.dpi.nsw.gov.au/fisheries/habitat/publications/policies,-guidelines-and-manuals/fish-habitat-conservation
List of national parks	www.environment.nsw.gov.au/NationalParks/parksearchatoz.aspx
Revocation, recategorisation and road adjustment policy (OEH, 2012)	www.environment.nsw.gov.au/policies/RevocationOfLandPolicy.htm

Title	Web address
Guidelines for developments adjoining land and water managed by the Department of Environment, Climate Change and Water (DECCW, 2010)	www.environment.nsw.gov.au/protectedareas/developmntadjoinin_gdecc.htm
<u>Aboriginal Cultural Heritage</u>	
Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010)	www.environment.nsw.gov.au/resources/cultureheritage/commconsultation/09781ACHconsultreq.pdf
Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW, 2010)	www.environment.nsw.gov.au/resources/cultureheritage/10783FinalArchCoP.pdf
Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (OEH 2011)	www.environment.nsw.gov.au/resources/cultureheritage/20110263ACHguide.pdf
Aboriginal Site Recording Form	www.environment.nsw.gov.au/resources/parks/SiteCardMainV1_1.pdf
Aboriginal Site Impact Recording Form	www.environment.nsw.gov.au/resources/cultureheritage/120558asirf.pdf
Aboriginal Heritage Information Management System (AHIMS) Registrar	www.environment.nsw.gov.au/contact/AHIMSRegistrar.htm
Care Agreement Application form	www.environment.nsw.gov.au/resources/cultureheritage/20110914TransferObject.pdf
<u>Heritage</u>	
The Burra Charter (The Australia ICOMOS charter for places of cultural significance)	http://australia.icomos.org/wp-content/uploads/The-Burra-Charter-2013-Adopted-31.10.2013.pdf
Statements of Heritage Impact 2002 (HO & DUAP)	www.environment.nsw.gov.au/resources/heritagebranch/heritage/hmstatementsofhi.pdf
NSW Heritage Manual (DUAP) (scroll through alphabetical list to 'N')	www.environment.nsw.gov.au/Heritage/publications/
<u>Water</u>	
Flooding	
Floodplain development manual	www.environment.nsw.gov.au/floodplains/manual.htm
NSW Climate Impact Profile	http://climatechange.environment.nsw.gov.au/
Climate Change Impacts and Risk Management	Climate Change Impacts and Risk Management: A Guide for Business and Government, AGIC Guidelines for Climate Change Adaptation

Our Ref: 62511
Your Ref: SSD 9564

Contact: Lesley Duncan

Date: 7 September 2018

Iwan Davies
Resource and Energy Assessments – Planning Services
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2671

Dear Iwan

**RE: Draft Secretary's Environmental Assessment Requirements
Wyalong Solar Farm – SSD 9564**

Council has reviewed the draft Secretary's Environmental Assessment Requirements for the proposed Wyalong Solar Farm. Council considers that the following matter should be addressed in the Environmental Impact Statement for the proposal:

Waste Generation and Disposal

The development will generate significant waste from solar panel packaging. The scoping report that identified waste management would not be addressed in the EIS, however, the volume of waste that could be expected to be generated from the site would have a significant impact on the capacity of the West Wyalong Landfill. Accordingly Council considers that waste management should be addressed in the EIS.

Should you have any questions in relation to this matter please contact Council's Manager Development and Regulatory Services, Lesley Duncan, on 69722266.

Yours faithfully



Will Marsh
Acting General Manager

OUT18/13473

Iwan Davies
Senior Environmental Assessment Officer
Resource and Energy Assessments | Planning Services
NSW Department of Planning and Environment

iwan.davies@planning.nsw.gov.au

Dear Mr Davies

Wyalong Solar Farm SSD 9564
Comment on the Secretary's Environmental Assessment Requirements (SEARs)

I refer to your email of 24 August 2018 to the Department of Industry (DoI) in respect to the above matter. Comment has been sought from relevant branches of Lands & Water and Department of Primary Industries (DPI), and the following requirements for the proposal are provided:

DoI - Water

- The identification of an adequate and secure water supply for the life of the project. This includes confirmation that water can be sourced from an appropriately authorised and reliable supply. This is also to include an assessment of the current market depth where water entitlement is required to be purchased.
- A detailed and consolidated site water balance.
- Assessment of impacts on surface and ground water sources (both quality and quantity), related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, and groundwater dependent ecosystems, and measures proposed to reduce and mitigate these impacts.
- Proposed surface and groundwater monitoring activities and methodologies.

Consideration of relevant legislation, policies and guidelines, including the NSW Aquifer Interference Policy (2012), the DPI Water Guidelines for Controlled Activities on Waterfront Land (2012) and the relevant Water Sharing Plans (available at <https://www.industry.nsw.gov.au/water>).

DPI – Agriculture

- The Draft SEARs provided by the Department of Planning and Environment should be amended with the following changes:
 - a. (General requirements – *details of construction, operation and decommissioning, including rehabilitation objectives for agricultural land.*
 - b. (Land – *a soil survey undertaken in accordance with any Guidelines listed in Attachment 1*)

The EIS should be required to address or provide the following:

- Assessment of impacts to surrounding agricultural land uses and industries, including impacts resulting in a temporary or a permanent loss to land capability or agricultural productivity. This would include demonstration that all significant impacts on current and potential agricultural developments and resources can be reasonably avoided or adequately mitigated.
- A Land Use Conflict Risk Assessment (see link in **Attachment A**), including:
 - Identification of potential land use conflict, in particular relating to separation distances and management practices to minimise dust, noise and visual impacts from sensitive receptors. For example, this may include outlining strategies to avoid land use conflict around agricultural aerial spraying and fertilising in the area.
 - Consultation and negotiation with owners/managers of affected adjoining agricultural operations.
- A biosecurity (pests, weeds and livestock disease) risk assessment outlining the likely plant, animal and community risks (as per the Infrastructure Proposal guideline below) including monitoring and mitigation measures.
- A rehabilitation and decommissioning strategy that will ensure that the land is returned to its predevelopment state. The rehabilitation and decommissioning strategy should include the removal of all underground infrastructure to ensure all previously cropped lands are returned to their predevelopment state.

Attachment A provides the relevant guidelines for environmental assessment.

Any further referrals to Department of Industry can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

Yours sincerely



Alex King
 Director Cabinet & Legislation Services
Lands and Water - Strategy and Policy
 10 September 2018

**Wyalong Solar Farm SSD 9564
SEARs**

DPI – Agriculture

Guidelines for assessment:

- Land Use Conflict Risk Assessment Guide
 - www.dpi.nsw.gov.au/content/agriculture/resources/lup/development-assessment/lucra
- Infrastructure Proposals on Rural Land
 - <http://www.dpi.nsw.gov.au/content/agriculture/resources/lup/development-assessment/infrastructure-proposals>

END ATTACHMENT A

Please note that EE's existing 132kV transmission line runs through the property and the solar farm substation (connection point to the Essential Energy Transmission network) is proposed to be located within the site boundaries. There doesn't seem to be any proposal to relocate the 132kV powerline outside the property to accommodate the construction of the solar farm. Connection to EE's grid seems to be included within the scope of the proposed project, therefore it would be expected that any environmental impacts associated will be assessed as part of the EIS prepared under Part 4 of the EP&A Act.

The main thing we are interested in, is that the proponent clearly states in their EIS whether any connections to EE's grid (including the construction of any substations, or additional feeder lines that may be required to connect to EE's grid) are assessed through the EIS under Part 4. Or are they to be excluded under Part 4 and assessed (and hence determined) by EE under Part 5 of the EP&A Act.

Best Regards,

Michelle Murray
Major Network Connections Manager



T: 02 6589 8334 | M: 0437 100 721 | Ext: 88334
michelle.k.murray@essentialenergy.com.au
PO Box 5730 Port Macquarie NSW 2444 | essentialenergy.com.au
General enquiries: 13 23 91 | Supply interruptions (24hr): 13 20 80

07 September 2018

Iwan Davies
Senior Environmental Assessment Officer – Planning Services
Department of Planning & Environment
GPO BOX 39
SYDNEY NSW 2001

Your Ref: SSD 9564
Our Ref: DOC18/619460

Emailed: Iwan.Davies@planning.nsw.gov.au

Dear Mr Davies

Re: Wyalong Solar Farm (SSD9564) – Request for SEARs

Thank you for the opportunity to provide advice on the Secretary's Environmental Assessment Requirements (SEARs) for the Wyalong Solar Farm (SSD9564). This is a response from the Department of Planning & Environment – Division of Resources & Geoscience (the Division).

The Division is responsible for providing strategic advice relating to the current and potential future uses of land in NSW pursuant to the *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007* (MSEPP) and the *Environmental Planning & Assessment Act 1979* (EP&A Act). The Division's role is to ensure that proposals, including associated electricity transmission infrastructure do not necessarily preclude access to known resources or exploration for future resource discovery and extraction. The Division will also assess the application with respect to biodiversity offset considerations.

The Division has reviewed the Draft SEARs and Preliminary Environmental Assessment – Scoping Report (PEA, dated 23 August 2018) for the Wyalong Solar Farm Project (SSD9564). The Draft SEARs require the proponent to address the project's potential impacts on existing land use, including mining, mineral and petroleum rights on the site and adjacent land, including an assessment of cumulative impacts of nearby developments and compatibility of the development with existing land uses during construction, operation and following decommissioning. Consultation with exploration licence holders, quarry operators and mineral title holders during the preparation of the Environmental Impact Statement (EIS) is also a requirement.

The proponent should identify any of the above in the EIS and consult with the operators or title holders to establish if the proposal is likely to have a significant impact on current or future extraction of minerals, petroleum or extractive materials (including by limiting access to, or impeding assessment of resources). The EIS should also document any way the proposed development may be incompatible with existing or approved uses, or current or future extraction or recovery of resources under the land use compatibility requirements of Part 3 (13) of the MSEPP.

In fulfilling the SEARs relating to the State's mineral resources and rights to assess and extract those resources, the Division requires the following project specific requirements to be addressed in the EIS:

- The proponent should undertake a dated and referenced search of current mining and exploration titles and applications. Evidence of the search should be provided in the form of a date referenced map. Current mining and exploration titles and applications can be viewed through the Division's Minview map viewer at:

<http://www.resourcesandenergy.nsw.gov.au/miners-and-explorers/geoscience-information/services/online-services/minview>

In relation to the above requirement, the Division notes that the project is located in highly prospective Macquarie Arc rocks within the Gilmore Fault Zone. The Macquarie Arc is considered to host the most economic porphyry deposits in NSW, with an approximate density of 39 deposits per 100,000 km², including Cadia, Northparkes and Lake Cowal Gold Mines. The project site is coincidental with Exploration Licence 8430 (EL8430) held by Argent Minerals Limited for Group 1 minerals, which covers the western half of the proposal area (refer to Figure 1). EL 8430 covers Argent's West Wyalong Project, with recent exploration identifying two copper-gold targets -Theia and Narragudgil.

- The proponent must consult with Argent Minerals, contact details are:

Argent Minerals Limited
Level 2
66 Hunter Street
SYDNEY NSW 2000

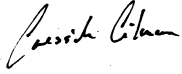
Contact details for Argent Minerals Limited Agent are:
Mining Title Services
Attn: Bob Harrison
9 Kinsellas Lane
Lane Cove North NSW 2066

The proponent is to contact the Division if no response is received from the affected title holder. The Division notes that according to its databases, there are no operating quarries in the immediate vicinity of the project site.

- Consultation with the Division in relation to the proposed location of any offsite biodiversity offset areas or any supplementary biodiversity measures to ensure there is no consequent reduction in access to prospective land for mineral exploration, or potential for sterilisation of mineral or extractive resources

Queries regarding the above information should be directed to the GSNSW Land Use team at landuse.minerals@geoscience.nsw.gov.au.

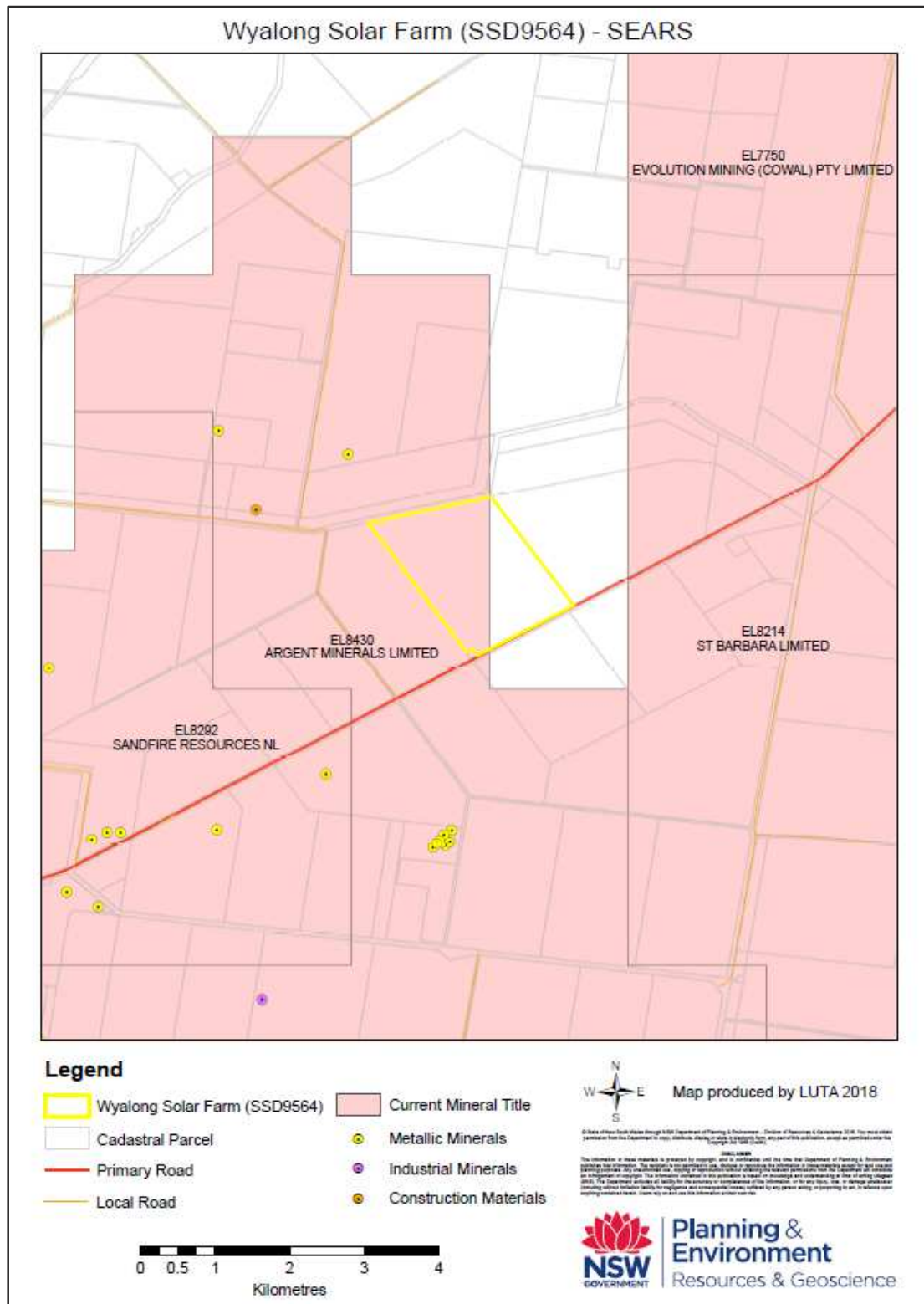
Yours sincerely



Cressida Gilmore
Manager – Land Use

for Paul Dale
Director – Land Use & Titles Advice

Figure 1. Wyalong Solar Farm Project (SSD9564), showing current mineral titles and mineral occurrences in relation to the project area.



File Ref. No: BFS18/2432 (4604)
 TRIM Doc. No: D18/61637
 Contact: Station Officer Mark Castelli

30 August 2018

The Department of Planning & Environment
 C/- Iwan Davies
 GPO Box 39
 SYDNEY NSW 2001
 E: iwan.davies@planning.nsw.gov.au

Dear Iwan Davies,

**Secretary's Environmental Assessment Requirements (SEARs)
 Wyalong Solar Farm Project (SSD 9564)**

I refer to the above development proposal and the Department of Planning & Environment's (the Department) invitation for agencies to provide advice for consideration in development of the SEARs. Fire & Rescue NSW (FRNSW) have reviewed aspects of the Scoping Report and the following comments and recommendations are submitted for consideration.

FRNSW notes that the facility's proposed location is within a NSW Rural Fire Services' (RFS) fire district. Notwithstanding, in the event of a significant fire event (either on or off-site in proximity to the development) or hazardous material incident, FRNSW will be responded to either assist the RFS or to fulfill the role of designated combat agency.

It is FRNSW experience that small and large-scale photovoltaic installations present unique electrical hazard risks to our personnel when fulfilling their emergency first responder role.

In addition, the Work Health and Safety (WHS) Act 2011 (and its subordinate Regulation) classify FRNSW as an person (entity) conducting a business or undertaking (PCBU). Clauses 34 and 35 of the WHS Regulation impose specific obligations upon a PCBU to identify hazards and manage risks at workplaces.

Due to the electrical hazards associated with large scale photovoltaic installations and the potential risk to the health and safety of firefighters, both FRNSW and the NSW Rural Fire Service must be able to implement effective and appropriate risk control measures when managing an emergency incident at the proposed site.



Recommendations

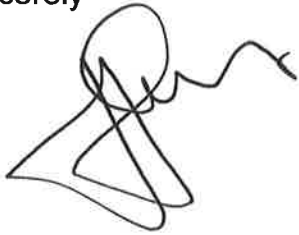
Should a fire or hazardous material incident occur, it is important that first responders have ready access to information which enables effective hazard control measures to be readily implemented. Without limiting the scope of the emergency response plan (ERP), the following matters are recommended to be addressed:

1. That a comprehensive ERP is developed for the site.
2. That the ERP specifically addresses foreseeable on-site and off-site fire events and other emergency incidents (e.g. fires involving solar panel arrays, battery storage systems, bushfires in the immediate vicinity) or potential hazmat incidents.
3. That the ERP detail the appropriate hazard control measures that would need to be implemented to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards). Such measures would include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures, minimum evacuation zone distances and a safe method of shutting down and isolating the photovoltaic and battery storage systems (either totally or partially, as determined by risk assessment).
4. Other risk control measures that may need to be implemented in a fire emergency (due to any unique hazards specific to the site) should also be included in the ERP.
5. That two copies of the ERP (detailed in recommendation 1 above) be stored in a prominent 'Emergency Information Cabinet' located in a position directly adjacent to the site's main entry point/s.
6. Once constructed and prior to operation, that the operator of the facility contacts the relevant local emergency management committee (LEMC). The LEMC is a committee established by Section 28 of the State Emergency and Rescue Management Act 1989. LEMCs are required to be established so that emergency services organisations and other government agencies can proactively develop comprehensive inter agency local emergency procedures for significant hazardous sites within their local government area. The contact details of members of the LEMC can be obtained from the relevant local council.



For further information please contact the Infrastructure Liaison Unit, referencing FRNSW file number BFS18/2432. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely



A/Superintendent John Hawes
A/Manager Fire Safety Branch
Community Safety Directorate





7 September 2018

SWT18/00117
SF2018/274667
MM

The Manager
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Iwan Davies

SSD-9564 – SECRETARY’S ENVIRONMENTAL ASSESSMENT REQUIREMENTS – PROPOSED “WYALONG” SOLAR FARM, LOT 160 DP750615, NEWELL HIGHWAY, WYALONG.

I refer to correspondence forwarded to Roads and Maritime Services requesting the provision of Environmental Assessment Requirements to be addressed in the supporting documentation to be submitted for the subject development. The request is supported by a Preliminary Environmental Assessment prepared by ECO Pacific dated August 2018.

From review of the information provided it is understood that the development proposal represents the establishment of a Solar Farm project with an intended capacity of up to 130 Mega Watt plus ancillary infrastructure on the subject site. The subject site is located to the north east of Wyalong with frontage and proposed access to the Newell Highway. The frontage to the site has frontage to the Newell Highway which is an approved road train route within a 110 km/h speed zone

Given the scale and operational characteristics of the proposed development Roads and Maritime Services considers that the traffic related issues relevant to the development should be considered and addressed in 2 distinct stages as follows;

- Construction & Decommission phase – the transport of materials and equipment/components for the establishment of the facility and ancillary infrastructure, the movement and parking of construction related vehicles, including personal vehicles, during the construction of the facility,
- Operational phase – the ongoing traffic generation due to the operation, maintenance and servicing of the various elements of the project.

Roads and Maritime Services emphasises the need to minimise the impacts of any development on the existing road network and maintain the level of safety, efficiency and maintenance along the road network. For such a development an assessment of the potential traffic impacts on the surrounding road network due to the development, particularly during the construction phase, should be submitted with the Development Application. The required contents and detail of the Traffic Impact Assessment (TIA) will depend on the scale of the proposed development, the characteristics of the potential traffic generation and the traffic volumes and other traffic generating influences on the surrounding public road network.

Given the potential volume of traffic and the need for deliveries of the components to the development site during the construction period a Transport Management Plan for the construction activity should also be prepared for the proposed development. This is referred to in the submitted Preliminary Environmental Assessment Report. Details for deliveries of ancillary materials such as gravel and concrete should also be considered as part of the submitted documentation.

The TIA shall detail the potential impacts associated with the phases of the development, the measures to be implemented to maintain the standard and safety of the road network, and procedures to monitor and ensure compliance. Where road safety concerns are identified at a specific location along the haulage route/s, the TIA may be supported by a targeted Road Safety Audit undertaken by suitably qualified persons.

For guidance in the preparation of the TIA the applicant is referred to section 2 of the “Guide to Traffic Generating Developments” prepared by the RTA and the Austroads publications, particularly the Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development and Austroads Guide to Traffic Management Part 3 – Traffic Studies and Analysis. The TIA should contain information such as the expected traffic generation, vehicle numbers and types of vehicles, and travel routes for vehicles accessing the development site.

Given the type and scale of the proposed development and its proximity to the public road network it is considered appropriate that issues relating to potential for distraction of, and for glint/glare impacts on, passing motorist be addressed in the development submission. Consideration could be given to the establishment and maintenance of a visual buffer, such as a vegetated buffer, within the subject site along its frontage to any public road.

The submitted document indicates that access to the development site is proposed from the Newell Highway, which is a classified road. However as the subject site also has potential for access via the local road network the provision of SEPP (Infrastructure) would apply and need to be addressed in the supporting documentation.

Any enquiries regarding this correspondence may be referred to the Manager, Land Use for Roads and Maritime Services (South West Region), Maurice Morgan, phone (02) 6923 6611.

Yours faithfully



Per:
Jonathan Tasker
Acting Director
South West NSW

Safework NSW will not be making comment on the Development Application and Environmental Impact Statement for the proposed Wyalong Solar Farm.

Safework will look forward to working with the successful contractor during the construction phase.

regards

Mark Barber

Manager Riverina Murray, Operations & Sector Initiatives.

SafeWork NSW, Better Regulation

Department of Finance, Services and Innovation

Address: Level 2, 76 Morgan Street, Wagga Wagga NSW 2650

Ph: 02 6933 6501

Mb: 0438 980 610

mark.barber@safework.nsw.gov.au



Iwan Davies

From: Easements&Development <Easements&Development@transgrid.com.au>
Sent: Tuesday, 11 September 2018 11:42 AM
To: Iwan Davies
Subject: 2018-409 Request for Input - Wyalong Solar Farm (SEARs) 9564

TransGrid Number: 2018-409

Proposal: Request for Input - Wyalong Solar Farm (SEARs) 9564

Thank you for referring the above mentioned Development Application to TransGrid for review.

Please be advised after reviewing the proposed works at **Wyalong Solar Farm (SEARs) 9564**

TransGrid has determined the proposed works acceptable subject to the following conditions of approval being met and comments expressed noted and as appropriate actioned:

Conditions:

1. The project scope description should include all ancillary electricity transmission works (all works associated with connection to the National Electricity Market, such as ancillary substation works, transmission line works (direct and upstream), and telecommunications works) that would be necessary for the construction and operation of the Project.
2. The EIS should identify all land parcels affected by these works and include them within the project boundary.

Regards

Michael

Michael Platt

Development Assessment and Control Officer | Network Planning and Operations

TransGrid | 200 Old Wallgrove Road, Wallgrove, NSW, 2766

T: (02) 9620 0161 **M:** 0427 529 997

E: Michael.Platt@transgrid.com.au **W:** www.transgrid.com.au

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NSW RURAL FIRE SERVICE



The Secretary
Department of Planning and Environment
GPO BOX 39
SYDNEY NSW 2001

Your reference: SSD 9564
Our reference: D18/7006
DA18082914797 BB

Attention: Iwan Davies

14 September 2018

Dear Madam,

Request for Input into Secretary's Environmental Assessment Requirements - Wyalong Solar Farm

Reference is made to correspondence dated 27 August 2018 seeking input into the preparation of the Secretary's Environmental Assessment Requirements for the above State Significant Development in accordance with the *Environmental Planning and Assessment Act 1979*.

The New South Wales Rural Fire Service (NSW RFS) advises that the preparation of an Environment Assessment should incorporate a bush fire hazard assessment report prepared by a suitably qualified person. This assessment shall include site-specific recommendations for the proper design of:

- asset protection zones (APZs);
- measures to prevent a fire occurring within the site from developing into a bush/grass fire risk to the surrounding area;
- water supply for fire fighting purposes;
- land and vegetation management;
- emergency management procedures, including the development of a Fire Management Plan in consultation with the local NSW RFS District fire Control Centre; and
- vehicular access and defendable space around the solar array.

Protection for the facilities from bush fires can be achieved through a combination of strategies which will:

- minimise the impact of radiant heat and direct flame contact by separating development from bush fire hazards;
- minimise the vulnerability of buildings to ignition and fire spread from flames, radiation and embers;
- enable appropriate access and egress for the public and firefighters;
- provide adequate water supplies for bush fire suppression operations;

Postal address

NSW Rural Fire Service
Planning and Environment Services
Locked Bag 17
GRANVILLE NSW 2141

T 1300 NSW RFS
F (02) 8741 5433
E records@rfs.nsw.gov.au
www.rfs.nsw.gov.au

- focus on facility preparedness, including emergency planning and property maintenance requirements; and
- facilitate the maintenance of APZs, fire trails, access for firefighting and on-site equipment for fire suppression and prevention of fire spreading from the site.

Should you wish to discuss this response please contact Bradley Bourke on 1300 NSW RFS.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Martha Dotter', with a stylized, cursive script.

Martha Dotter
Acting Team Leader, Development Assessment and Planning
Planning and Environment Services (South)