

25 November 2019

NSW Department of Planning, Industry and Environment
Attn: Ms Tatsiana Bandaruk
320 Pitt Street
Sydney NSW 2001

Dear Ms Tatsiana Bandaruk,

**Wellington Solar Farm Modification Application (SSD 8573 Mod 1)
Amendment to Modification Application**

I am writing to formally amend the modification application currently being assessed by the Department of Planning, Industry and Environment for the Wellington Solar Farm (SSD 8573 Mod 1). The modification application now seeks approval for an additional area to accommodate the fill and batter required to support the Wellington Substation bench extension. Refer to the attached drawings, Annexure A.

The additional area equates to 0.1 hectares (ha). We have estimated that approximately 700 cubic metres of fill would be required for the batter; 140 cubic metres of this would be road base.

Aspects of the amended modified project where there are potential material changes to the predicted environmental impacts include Aboriginal heritage, biodiversity and traffic, transport and road safety. These areas are discussed further below.

Aboriginal heritage

As with the original modification application, the amended modified development footprint was sufficiently assessed and surveyed during the field work previously undertaken by NGH Environmental archaeologists and Aboriginal community representatives for the Wellington Solar Farm and Wellington North Solar Farm. During these previous surveys, the general area surrounding the Wellington Substation was deemed to have low archaeological sensitivity and to have been highly disturbed and modified by the construction and maintenance of the Wellington Substation and its associated transmission lines. No Aboriginal objects/sites or areas of potential archaeological deposits were identified within or adjacent to the modified development footprint.

As such, the amended modification application in no way alters or affects the assessment or recommendations in the Wellington Solar Farm Aboriginal Cultural Heritage Assessment Report (NGH 2018) or Cultural Heritage Management Plan (CHMP) that has been developed for the project.



In regard to consultation with the Registered Aboriginal Parties (RAPs), the notification letter provided to the RAPs for the original modification application included the additional area required for the fill and batter. Refer to the attached letter, dated 14 August 2019, Annexure C. The RAPs provided support for the modification application in letter responses, dated 22 August 2019.

Biodiversity

The additional area for the batter is comprised of 0.1 ha of Vegetation Zone 5 (PCT 266) – White Box grassy woodland derived grassland (moderate to low condition). The location of the additional area is within the project site previously surveyed by NGH, hence Plant Community Types (PCTs) and BAM plot data are available for this area.

With the inclusion of this additional area, the modification application would require 0.78 ha of ground disturbance, comprised of the following vegetation communities:

- Vegetation Zone 2 (PCT 266) - White Box grassy woodland – planted (moderate to good condition) - 0.02 hectares (ha)
- Vegetation Zone 5 (PCT 266) - White Box grassy woodland derived grassland (moderate to low condition) - 0.46 ha
- Vegetation Zone 6 (PCT 266) - White Box grassy woodland derived grassland (low condition) – 0.30 ha

Refer to Figure 1.

As with the original modification application, of the 0.78 ha that would be impacted by the amended modification application, 0.32 ha would have been impacted by the approved overhead transmission line alignment, including the 0.02 ha of White Box grassy woodland – planted (moderate to good condition).

Re-running the Biodiversity Assessment Method (BAM) calculator on 21 November 2019, for this small change in area for Zone 5 did not require any additional plot data; the minimum plot requirements of the BAM have been met. Further, no habitat features would be impacted. Refer to Figure 1 for expanded fill area and location of existing plots and habitat features.

Re-running the BAM calculator returned the following candidate species, all of which have previously been assessed for the site in targeted surveys in suitable habitat (2017 and 2019, as referenced in the Biodiversity Development Assessment Report, Wellington Solar Farm Substation Expansion; NGH 2019):

- Silky Swainson-pea (*Swainsona sericea*)
- Euphrasia arguta (*Euphrasia arguta*)
- Tumut Grevillea (*Grevillea wilkinsonii*)
- Ausfelds Wattle (*Acacia ausfeldii*)



Re-running the BAM calculator for this small change in area for Zone 5, returns no change in biodiversity credits required for the project (refer Annexure B).

The additional 0.1 ha of Vegetation Zone 5 (PCT 266) – White Box grassy woodland derived grassland (moderate to low condition) that would be impacted would not alter the ecosystem and species credit requirements generated by the original modification application. Further, the relevant mitigation strategies in the Development Consent would apply equally to the amended modification application.

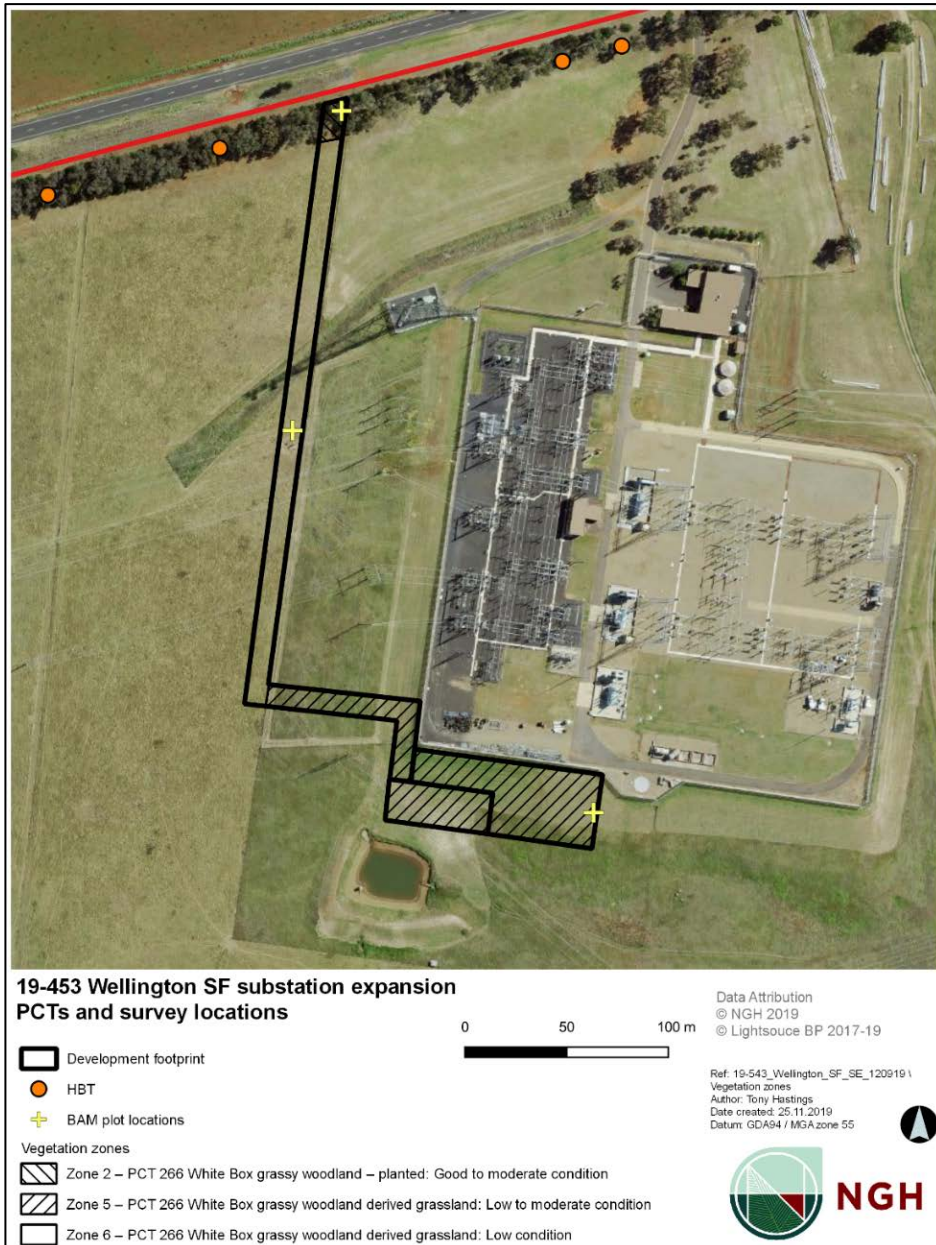


Figure 1: Updated substation expansion footprint

Traffic, transport and road safety

Additional consideration has been undertaken regarding traffic and access. No changes to equipment traffic movements or impact types are relevant to the addition of 0.1 ha to the bench area. The EIS (NGH 2017) stated that during the peak construction period there would be a maximum of 100 heavy vehicles and 300 light vehicles.

With regard to the original modification application, with the exception of two over-dimensional vehicles required to deliver the transformer and 33 kV GIS building, the other vehicles were accounted for in the EIS assessment.

Specific to the 700 cubic metres of fill now estimated to be required to expand the bench area, 30 heavy vehicles (i.e. truck and dog) would be required to transport this fill to site, which would average out to 3 heavy vehicle movements per day over a 10-day period towards the beginning of the construction period. As the original application and subsequent modification application had conservatively estimated 100 heavy vehicle movements per day, these additional 3 heavy vehicle movements per day have been adequately accounted for.

Effective management of the traffic, transport and road safety impacts will be achieved by following the existing environmental management strategies (updated by the modification application); no changes are proposed.

Soil

Additional consideration has been given to soil impacts. This was considered a lower risk issue in the EIS. In the original modification application, the substation footprint changes were noted as requiring a minor additional area ground disturbance on relatively flat land that is not considered a high erosion risk or near to natural waterways (Wuuluman Creek is over 700 metres to the north and a tributary of the Macquarie River is located over 350 metres to the south east).

Existing mitigation measures for the project are considered sufficient to address the additional 0.1 ha impacts now proposed. The works will be marginally closer to a farm dam but this can be managed with the existing measures including:

- establishing a 'no go' area to manage indirect impacts; and
- preparation, implementation and monitoring of a Soil and Water Management Plan (SWMP) (with erosion and sediment control plans) in accordance with Landcom (2004), to minimise soil (and water) impacts.

The conditions of consent would not need to be updated to take into account soil and water management.

General matters

No impacts on any other key issue would result from the changes. No historic heritage, noise, visual amenity or cumulative impacts are considered relevant to this small expansion of the substation area to accommodate the batter.



As with the original modification application, the Development consent conditions will need to be altered to include a revised general layout of development figure (provided in Annexure D) to reflect the amended modified development footprint.

Thank you and do not hesitate to contact me on 0409 601 473 to discuss.

Kind regards,



Diana Mitchell
Principal Environmental Planner

Enclosed:

- Annexure A – Drawings
- Annexure B – Updated BAM Credit Summary Report
- Annexure C - RAP consultation letter, dated 14 August 2019
- Annexure D – Amended General Layout of Development Figure