



**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

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Urbis Pty Ltd
ABN 50 105 256 228

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Ms Elle Donnelley
NSW Department of Planning and Environment
320 Pitt Street
Sydney NSW 2000

Dear Elle,

SSD 9504 - WEST WYALONG SOLAR FARM

This letter is prepared on behalf of Lightsource BP (the Proponent) in response to matters raised by the NSW Office of Environment & Heritage (OEH) regarding the removal of vegetation in Myers Lane proposed for the West Wyalong Solar Farm (Proposal). This letter is structured to:

- Clarify the extent of vegetation loss on the solar farm site and the Myers Lane road reserve.
- Detail the configuration options for the connection in Myers Lane from the Proposal to the Essential Energy transmission line.
- Confirm the Proponent's commitment to minimise disturbance to the ground and vegetation within Myers Lane where practically possible while addressing the standard design requirements of Essential Energy.
- Clarify the inconsistency regarding the total vegetation proposed to be removed in the original Biodiversity Assessment Report (BDAR) and the BDAR submitted to Response to Submissions (RTS).
- Confirm when the rehabilitation of the Myers Lane road reserve will occur.

PROPOSED VEGETATION LOSS

The following confirms the extent of vegetation proposed to be removed.

Paddock Tree Removal - Solar Farm site

The proposed development will require the removal of 32 paddock trees (12 casuarina cristata (Belah); three eucalyptus microcarpa (Grey Box); 17 eucalyptus behriana (Bull Mallee)). All of these trees are located within the site of the solar farm (not within the Myers Lane road reserve)

Vegetation Removal - Myers Lane

The maximum quantum of native vegetation will that would be required to be removed for the proposed development in Myers Lane would be 1.44ha.

PROPOSED CONNECTION

The connection in Myers Lane from the Proposal to the Essential Energy transmission line is proposed to be via an overhead powerline or an underground powerline. Either configuration is to be installed in accordance with the Essential Energy Easement Requirements dated 24 September 2018 (Easement Requirements).

Myers Lane is a public road and under the control of the Bland Shire Council. Accordingly, an easement is generally not required. However, for the purposes of installing the connection infrastructure the requirements set out in the Easement Requirements are to be considered. To demonstrate the spatial limitations of both configurations, the following provides the spatial requirements for both connection configurations:

- **Overhead powerlines** - the Easement Requirements at Section 8.1 nominates a minimum width of 30 metres to accommodate 132kV overhead powerlines.
- **Underground powerlines** - the Easement Requirements at Section 8.2 nominates width of six metres to accommodate 132kV, 66kV or 33kV supply underground powerlines.

Given an easement is not required as Myers Lane is a public road, it will not be necessary to clear the entire width of the 30m wide road reserve in order to install the overhead powerlines. However, if the connection is installed via overhead powerlines it will likely be necessary to remove trees or trim tree canopies to avoid conflict with poles and wires and mitigate potential safety impacts.

Once the connection infrastructure is installed it will become an Essential Energy asset. The final configuration of the connection within Myers Lane will be resolved with Essential Energy however the Proponent commits to minimising disturbance to the ground and vegetation within Myers Lane where practically possible while addressing the standard design requirements of Essential Energy.

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BDAR INCONSISTENCY

The BDAR initially submitted with the DA stated the total native vegetation loss was 1.83 ha (comprising 0.80ha PCT 55/ Zone 1 and 1.03ha PCT 26/ Zone 1).

The BDAR was revised for the Response to Submissions (RTS) to a total native vegetation loss was 1.44 ha (comprising 1.24ha PCT 55/Zone 1 and 0.20ha PCT 26/Zone 1).

REHABILITATION OF MYERS LANE

The Proponent commits to rehabilitating the disturbed area in Myers Lane with native plantings in consultation with Council at the decommissioning stage or at such time that the connection



infrastructure is removed by Essential Energy. There are two compelling reasons why rehabilitation of Myers Lane should not occur prior to decommission and the removal of the connection infrastructure.

Functional Impacts

It is not appropriate nor functional to plant any vegetation in the area to be used for the connection infrastructure. The planting of compensatory vegetation in the area of Myers Lane for overhead or underground powerlines has the potential to negatively impact the function of the infrastructure. If posts and wires are installed and operating or the connected infrastructure is not removed upon decommissioning of the Proposal (the connection will be an Essential Energy asset), the vegetation (particularly root systems and tree canopies) would have the potential to interfere with the connection and thus hinder the operation of the infrastructure.

In the event Essential Energy remove the infrastructure from Myers Lane upon decommissioning of the Proposal, the disturbed areas would be replanted with native plantings. The extent of planting would be agreed with the Council as the local road authority.

Biodiversity Offsets

It is not necessary nor reasonable for the rehabilitation to occur prior to commencement of operations as there is a biodiversity offset requirement proposed for vegetation removal and the impact of vegetation lost is adequately addressed.

The Proposal has assessed the worst-case scenario in terms of vegetation loss in Myers Lane due to the final connection configuration being unresolved as of the date of this letter. SLR Consulting Australia Pty Ltd have assumed the full loss of all vegetation in the Myers Lane road reserve in the impact assessment and biodiversity offset calculation.

The final connection configuration in Myers Lane will be resolved with Essential Energy with the Proponent committing to minimising disturbance to the ground and vegetation within Myers Lane where practically possible while addressing the standard design requirements of Essential Energy.

SLR Consulting Australia Pty Ltd used the BAM Calculator on 25 March 2019 to determine the offset obligation for the removal of native vegetation within Myers Lane (Case No 00013377). The offset calculations determined that the purchase and retirement of 37 ecosystem credits would be required to meet the offset obligation, as presented in Table 27 (below) of the amended BDAR submitted with the RTS.

Calculations to determine this final credit price are based on ecosystem credits required for removal of native vegetation within the Myers Lane road reserve will be determined once the final connection configuration is determined. For the purposes of the development application the worst-case scenario is assumed, and the relevant impact assessment and biodiversity offset calculations have been undertaken, and adequate mitigation measures proposed.



Table 27 Ecosystem credits for plant community types (PCT), ecological communities & threatened species habitat (Vegetation Removal)

Zone	Vegetation Zone Name	Vegetation Integrity Loss	Area (hectares)	Constant	Species sensitivity to gain class	Biodiversity Risk weighting	Candidate SAI	Ecosystem Credits
Zone 1	PCT 26_Moderate	51.4	0.20	0.25	High	2.00	True	5
Zone 2	PCT 55_Moderate	51.2	1.24	0.25	High	2.00	N/A	32
Total: 37 Ecosystem Credits								

Source: Biodiversity Development Assessment Report (610.18343-R01-v4.0 – dated 26 March 2019) prepared by SLR Consulting Australia Pty Ltd

If you have any questions, please don't hesitate to contact me at (02) 8233 7678 or cbrown@urbis.com.au.

Yours sincerely,

Clare Brown
Director