



Inspired People.
Dedicated Team.
Quality Outcomes.

Our Ref: 23485_GRSF_Response to DPHI RFI 18 June_itr_Final

27 June 2024

Joe Fittell
Team Leader, Energy Assessments
Department of Planning, Housing and Infrastructure

E| Joe.Fittell@planning.nsw.gov.au

Dear Joe,

RE: Goulburn River Solar Farm - Response to DPHI Request for Further Information (RFI), dated 18 June 2024

1.0 Introduction

Umwelt was engaged by Lightsource bp Development Services (Lightsource bp) to prepare the Environmental Impact Statement (EIS), Response to Submissions (RtS) Report and Amendment Report 1 (Part A and B), and Amendment Report 2 for the Goulburn River Solar Farm Project (the Project).

Following review of the Temporary Workers Accommodation Facility (TWA Facility) Amendment Report (i.e. Amendment Report (2)) and draft conditions of consent by government agencies, the Department of Planning, Housing and Infrastructure (DPHI) have requested additional information whilst they continue to assess the merits of the Project.

This letter has been prepared to provide clarification and/or additional information in response to residual queries in advice from the following agencies:

- Biodiversity, Conservation and Science (BCS) Group dated 28 May 2024,
- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water dated 14 June 2024,
- National Parks and Wildlife Service (NPWS) dated 12 June 2024,
- Transport for NSW (TfNSW) dated 13 June 2024,
- Upper Hunter Shire Council (UHSC) dated 14 June 2024,
- Mid-Western Regional Council (MWRC) dated 12 June 2024, and
- Forestry Corporation of NSW (FCNSW) dated 19 June 2024.

**Umwelt (Australia)
Pty Limited**

ABN 18 059 519 041

T| 1300 793 267
E| info@umwelt.com.au

www.umwelt.com.au

2.0 Response to RFI

A summary response has been provided to each item raised specifically by BCS in its advice received on 28 May 2024 in **Table 2.1** below. **Appendix A** provides greater detail on each point. **Appendix B** provides supporting material for the response to BCS.

Appendix C provides a response to NPWS advice received as part of the BCS letter on 28 May 2024.

Table 2.2 below provides responses to queries on the TWA Facility Amendment Report (2) from the agencies listed in **Section 1.0**.

Table 2.1 Summary of Lightsource bp response to BCS advice

Item	BCS Recommended Action	Summary of Response
1	Revise the Solar BDAR, in consultation with BCD, to provide additional and appropriate measures for Box Gum Woodland (BGW) critically endangered ecological community (CEEC) in accordance with section 7.16(3) of the <i>Biodiversity Conservation Act 2016</i> (BC Act).	<p>Section 11 of the Amended BDAR describes the proposed Goulburn River Biodiversity Stewardship Site (BSS), which is being established to offset Project impacts, including those to the BGW CEEC. The BSS application has progressed since the BDAR was submitted and is under assessment at the time of this response. The draft BSS contains 726 ha of BGW CEEC, equating to 1,745 credits. The BSS will directly compensate for approximately 40% of the impacts on BGW CEEC as a result of the Goulburn River Solar Farm Project. The remainder of the BGW CEEC offset liability will be satisfied through management and protection of approximately 800 ha at a separate BSS within 100 km of the impact area. This means that the 188.5 ha of impacted BGW (of which 23.14 ha is woodland and 165.36 ha is derived native grassland [DNG]) will be offset by 1,526 ha, at what is an almost 1:8 ratio.</p> <p>In addition to the biodiversity offset, Lightsource bp have committed to the following conservation measures for the BGW CEEC:</p> <p>Commitment to rehabilitate 23.14 ha of BGW DNG (PCT 483) within the proposed Goulburn River BSA to a woodland state and to protect this area in perpetuity.</p> <ul style="list-style-type: none"> • The quantity of revegetation is based upon a ratio of 1:1 to the area of impact. • The location of revegetation is proposed within the BSA, in order to be local to the impact and to ensure protection in perpetuity. • Additional biodiversity offset credits would not be generated on the rehabilitation activities – i.e., this activity will be surplus to the requirements of the biodiversity assessment method (BAM). <p>Commitment to research to determine whether BGW DNG can be maintained with a vegetation integrity score greater than zero.</p> <ul style="list-style-type: none"> • Lightsource bp would undertake a study of vegetation integrity (VI) pre- and post- construction, to test the hypothesis of whether the installation and operation of solar panels results in a substantial change to the VI score for low / low to moderate condition derived native grasslands (specifically, PCT 483).
2	BCD considers that the project is likely to result in a Serious and Irreversible Impact to regent honeyeater. The proponent should provide further information detailing the specific size	Section 11 of the Amended BDAR describes the proposed Goulburn River BSS, which is intended to offset impacts to Regent Honeyeater. The BSS application has progressed since the BDAR was submitted and is under assessment at the time of this response. The draft BSS contains 829 ha of Regent Honeyeater Important habitat, equating to 3,575 credits. 40% of the Regent Honeyeater Important Habitat conserved within the BSS

Item	BCS Recommended Action	Summary of Response
	and condition of the BSS proposed as an additional and appropriate measure.	<p>will directly compensate for impacts from the Goulburn River Solar Farm Project. This means that the 42.3 ha of impacted habitat will be offset by 829 ha, at what is an almost 1:20 ratio.</p> <p>As per Section 9.4 of the Amended BDAR, Lightsource bp has committed to additional conservation measures for Regent Honeyeater. The recognised species expert, Dr Ross Crates, concluded that offsite measures would offer the greatest benefit to the species (Appendix H, Amended Solar Farm BDAR). Lightsource bp will provide financial support (\$25,000 pa) over a fixed time period (five years) for one (or more) of the following offsite programs, with details to be confirmed in consultation with the relevant recognised species expert:</p> <ul style="list-style-type: none"> Noisy Miner management in known Regent Honeyeater breeding areas. A sustained management approach for five years would be expected to suppress Noisy Miner presence in nearby areas along Goulburn River, and to prevent recolonisation. Habitat restoration by planting within nearby areas subjected to Noisy Miner management would be beneficial for long-term species' management, with yellow box <i>Eucalyptus melliodora</i> of highest priority, along with secondary species including Blakely's red gum <i>E. blakelyi</i>, Manna gum <i>E. viminalis</i> and rough-barked apple <i>Angophora floribunda</i>. Approximately 2,500 tube stock could be planted each year for five years as a result of Lightsource bp's proposed support.
3	The large-eared pied-bat and eastern cave bat each require an SAI assessment in accordance with Section 9 of the BAM.	<p>Further SAI assessment is not required, as the Project is not expected to have any direct or indirect impacts on potential breeding habitat.</p> <p>The justification on the Project's approach to Large-Eared Pied-Bat and Eastern Cave Bat in Section 5.3 of the Amended BDAR remains relevant.</p>
	Additional microbat surveys are required in accordance the 'Species credit threatened bats and their habitats: NSW survey guide for the Biodiversity Assessment Method'.	Survey effort is considered adequate and was agreed to in consultation with BCD (BCD written response, dated 19th October 2023).
	The proponent provide detail in regard to survey effort used for roost surveys, including acoustic data and GIS data (including the time and date of each active search).	<p>Survey details are provided in Table 2.8 of the Amended BDAR.</p> <p>GIS data, inclusive of time and date of each active search, was provided to BCD via email on 1 February 2024. No sightings or acoustic recordings of microbats were obtained during roost surveys, therefore there are no acoustic files.</p>
	Should the proponent fail to provide the above information, they should provide species polygons for large-eared pied-bat and eastern cave bat in accordance with the BAM.	See responses above.

Item	BCS Recommended Action	Summary of Response
4	<p>The proponent should complete surveys for the striped legless lizard (<i>Delma impar</i>) in accordance with the Threatened reptiles – Biodiversity Assessment Method survey guide. The proponent should also make concentrated efforts within rocky areas with moderate grass cover (including exotic grass cover).</p>	<p>The justification on the Project’s approach to <i>Delma</i> spp. remains relevant as provided in Section 5.3 of the Amended BDAR, along with the expanded discussion on this matter in the letter provided to BCS (Additional Information to support Goulburn River Solar Farm Biodiversity Assessment – SSD3396453; dated 23rd January 2024).</p> <ul style="list-style-type: none"> - Surveys at the solar farm were completed prior to the publication of DPE (2021) and therefore the new guideline does not apply. This is in accordance with BOS Update 36 (See Item 4 Assessor update 36 (nsw.gov.au)) and Page 46 of the BAM Stage 1 Guideline (Biodiversity Assessment Method Operational Manual – Stage 1 (nsw.gov.au), which state that where survey has been completed prior to the publication of a new or revised survey guide, the department expects the assessor (or surveyor) to have applied current best-practice in searching for the target species. - Surveys were done in accordance with the published, peer-reviewed guidelines at the time (DSEWPC, 2011²). These Commonwealth government guidelines can reasonably be considered to be best-practice.
5	<p>Provide shapefiles displaying the location and length of stag watching surveys. The proponent must monitor potential nest locations for forest owl species for a minimum of two nights.</p> <p>Conduct targeted surveys for pink-tailed legless lizard (<i>Aprasia parapulchella</i>) in accordance with the Threatened reptiles – Biodiversity Assessment Method survey guide.</p> <p>Complete additional targeted surveys for squirrel glider (<i>Petaurus norfolcensis</i>) using either</p> <ol style="list-style-type: none"> 1. spotlighting AND cage trapping, or 2. spotlighting AND camera trapping, are considered acceptable. 	<p>Stag watch surveys are point based and do not have a mappable distance / length. Spatial data showing the location of stag watching surveys were provided to BCD on 1 February 2024.</p> <p>As per <i>Delma</i> spp., surveys were undertaken in accordance with the guidelines at the time (Cwth; DSEWPC, 2011). The guidelines referenced in the current advice were introduced after the completion of surveys for this species and compliance with the new guideline is therefore not required under the BAM. The justification on the Project’s approach remains relevant, as provided in Section 5.3 of the Amended BDAR. It is noted that this recommended action was not previously identified in BCD advice on the EIS BDAR.</p> <p>An adequate level of both spotlighting and camera trapping was conducted as part of the EIS BDAR. Notwithstanding that the survey effort was considered to be sufficient for this species, the Amended BDAR (s. 2.4.4, s.5.1.2.2) provided justification for excluding Squirrel Glider from further assessment:</p> <ul style="list-style-type: none"> • Absence of suitable habitat. • Not associated with any PCTs present (i.e., not triggered by the BAM-C). • Assessed in the EIS BDAR on a precautionary basis.

¹ NSW Department of Planning and Environment (DPE) 2022. *Threatened reptiles - Biodiversity Assessment Method survey guide*, Department of Planning and Environment, Parramatta.

² Australian Government Department of Sustainability, Environment, Water, Population and Communities (DSEWPC) 2011a. *Survey guidelines for Australia's threatened reptiles: Guidelines for detecting reptiles listed as threatened under the EPBC Act*.

Item	BCS Recommended Action	Summary of Response
		<ul style="list-style-type: none"> • Survey effort considered sufficient to demonstrate absence. • Able to be excluded as a candidate species in accordance with the BAM.
6	<p>Additional surveys are required for the proposed road upgrade to fulfil BAM requirements for the pink-tailed legless lizard, striped legless lizard, pale-headed snake and microbats. Species surveys should be conducted in accordance with relevant guidelines and the TBDC. Any proposed deviations from species survey must be approved by BCD.</p>	<p>Surveys carried out for the Pink-tailed Legless Lizard within the Road Upgrade area were consistent with those prescribed within relevant survey guidelines.</p> <p>Pale-headed Snake and candidate microbat species were assessed as assumed present and credits were calculated for assumed impacts, in accordance with the BAM.</p> <p>It is acknowledged that surveys for <i>Delma</i> spp. for the public roads BDAR were completed following the release of BAM guidelines for threatened reptile surveys (DPE 2021), which require either pitfall trapping or tile surveys. Given the disturbed nature of the roadside, the rocky hard ground, and the likelihood of trap tampering along the public road, Umwelt determined that pitfall trapping and/or tile surveys were not feasible, seeking feedback from BSC. The Project team were unable to contact the BSC Accountable Officer.</p> <p>Lightsource bp will assume presence for <i>Delma impar</i> within the 3.75 ha of potential habitat in the road development footprint. This equates to 27 credits.</p>
7	<p>The Road Upgrade BDAR should include further justification for selecting PCT 1691 in accordance with the NSW PCT classification as described in the BioNet Vegetation Classification.</p>	<p>Umwelt remain confident in their assessment of the PCT as 1691.</p> <p>This relates to four credits of Narrow-leaved Ironbark-Grey Box Grassy Woodland, which is also considered to be part of the Box Gum Woodland CEEC and therefore has already been accounted for within the Project's assessment of SAIL.</p>
8	<p>The proponent should provide information outlined in Section 5.2.2 of the BAM to justify excluding Bluegrass (<i>Dichanthium setosum</i>) from further assessment. If the proponent cannot provide sufficient information, it should complete surveys in line with the Surveying threatened plants and their habitats guideline and the Threatened Biodiversity Database Collection (TBDC).</p>	<p>It is assumed that this comment relates to the Solar Farm Site and it is noted this recommended action was not previously identified in BCD advice on the EIS BDAR.</p> <p><i>Dichanthium setosum</i> is not associated with the IBRA Subregion within which the Solar Farm occurs and is not associated with any of the PCTs recorded within the Project Area. As such, in accordance with S5.2.1(3) of the BAM, no further assessment for this species is required.</p> <p><i>Dichanthium setosum</i> was also considered within the MNES Report included as Appendix A of the BDAR and found to have a low likelihood of occurrence based on the Project Area occurring within an IBRA Bioregion that the species is not known or predicted to occur within.</p>

Table 2.2 Response to residual agency queries

Agency	Agency Request for Additional Information	Response
TfNSW	<p>TfNSW has reviewed the information and has no objections to the proposed development. TfNSW provides the following comments in relation to the amendment report for the Temporary Workers Accommodation (TWA) Facility for Goulburn Solar Farm:</p> <ol style="list-style-type: none"> 1. TfNSW response for the Goulburn River Solar Farm provided on the 9 May 2024 remains relevant and applicable to the proposed amendment for the TWA. 2. The TWA amendment and associated traffic generation, routes and the heavy vehicle design vehicle (largest vehicle) is required to be consistent with the revised Traffic Impact Assessment prepared by Umwelt and Turnbull Consulting (5 April 2024) for Amendment 1. 3. TfNSW advises that no pre-construction minor works should occur prior to the completion of the road upgrades for Ringwood Road/Golden Highway and Barnett Street/Golden Highway. 4. The Traffic Management Plan is required to be submitted to TfNSW for consultation prior to the commencement of road upgrades, to ensure the recommendations identified by Umwelt and Turnbull Consulting (5 April 2024) and any other requirements to reinforce the prohibition of the right turn out from the Ringwood Road/Golden Highway will be enforced. 	<p>Lightsource bp notes TfNSW's comments as acceptable and confirm they will be addressed following project approval and prior to construction.</p>
UHSC	<p>UHSC has reviewed the report and provides the following comments:</p> <ol style="list-style-type: none"> 1. We acknowledge that the establishment of a proposed TWA facility on site will result in lower peak and total vehicle movements during the construction phase of the project than those assessed in the Amendment Report (1). Therefore, it is expected that traffic impacts on local roads will be reduced. 2. We note that the proposed sewage treatment plant (STP) and disposal areas will require approval under section 68 of the Local Government Act 1993. The application for approval will need to be accompanied by a geotechnical investigation report together with design specifications and sizing calculations for any onsite effluent disposal areas. We recommend that any disposal areas be located at least 100m from any permanent water courses. 	<p>Lightsource bp notes UHSC's comments as acceptable.</p>

Agency	Agency Request for Additional Information	Response
	<p>3. We note that an emergency evacuation plan will be prepared for the TWA facility that will outline the evacuation process in the event of a bushfire emergency. We recommend that preparation of the plan be undertaken in consultation with the NSW Rural Fire Service and local brigades to ensure an effective and coordinated response in the event of a bushfire emergency.</p> <p>4. Council encourages the use of shuttle buses to transport workers to and from Merriwa to access local services, businesses and recreational facilities. This will allow workers to support the local Merriwa economy whilst minimising traffic movements on local roads.</p>	
MWRC	<p>Accommodation Council supports the construction of a TWA Facility for up to 400 beds within the Development Footprint.</p> <p>Water Council requests clarification on the water usage quantity as it seems from the calculate of 85/kL day per does not equate to an estimated 12ML/year.</p> <p>Sewer Council advice is that Gulgong, Rylstone, or Kandos STPs do not have any facilities to receive septage or sewage collected/tinkered from sites not services by the town sewage system. Council also notes that onsite disposal and use of effluent will need to be considered via separate consent determined by the relevant local government area (LGA).</p> <p>Waste Council wishes to advise that none of its waste facilities are appropriate or capable of handing the disposal of landfill waste generated by the Project.</p>	<p>Accommodation Noted.</p> <p>Water Lightsource bp notes the inconsistency presented in the Amendment Report (2) and confirms the proposed water usage is estimated at 12ML/year which equates to approximately 33kL day.</p> <p>Sewer Noted. Lightsource bp confirms that the Project will not rely on the MWRC sewage facilities, and will seek separate approval from UHSC for the onsite disposal of use of effluent.</p> <p>Waste Noted. Lightsource bp confirms that the Project will not rely on the MWRC waste management facilities.</p>
NPWS	<p>Unauthorised access or use of the national park NPWS recommend -</p> <ol style="list-style-type: none"> a. all future solar farm operational plans restrict use and access to the national park, permitting only authorised activities consistent with the 	<p>Unauthorised access or use of the national park Lightsource bp notes that these recommendations would form part of the Project Construction Environmental Management Plan (CEMP) and relevant sub-plans as required. It is noted that the TWA Facility will be located within the solar farm Development Footprint which is proposed</p>

Agency	Agency Request for Additional Information	Response
	<p>Goulburn River National Park and Munghorn Gap Nature Reserve - plan of management¹ (NPWS 2003).</p> <ul style="list-style-type: none"> b. site inductions include restrictions on access associated with the national park and focus on protection of its natural and cultural values. c. installation of security fencing around the temporary workers accommodation compound to control access to the national park and sensitive areas. <p>Landscape and visual impact (visual)</p> <p>NPWS recommends - Ensure lighting design accords with provisions as set out in the:</p> <ul style="list-style-type: none"> a. NSW Dark Sky Planning Guidelines (Department of Planning and Environment, 2023), in that good lighting design avoids excessive light spill into the night sky and will also protect the surrounding sensitive areas which include the national park. b. National Light Pollution Guidelines for Wildlife 3(DCCEEW, 2023) in the conservation, and protection of natural biodiversity values attributed to the national park at the interface with the Goulburn River NP. c. The Landscape Character and Visual Impact Assessment 2 (LCVIA 2) to place common areas, and car parking within the internal (central) zone of the TWA or on the roadside to contain or reduce incidence of light spill outside of the confines of the TWA. 	<p>to be fenced, as discussed in the Project EIS. Lightsource bp commit to erecting the security fence early in the construction schedule.</p> <p>Landscape and visual impact (visual)</p> <p>Lightsource bp confirms that lighting will be designed in accordance with these guidelines.</p>

Agency	Agency Request for Additional Information	Response
NPWS (continued)	<p>Noise and vibration</p> <p>NPWS reviewed the Addendum Noise and Vibration Impact Assessment (NVIA 2) which was prepared to assess the change to noise, and vibration impacts as part of the TWA, especially to Receiver R10 which represents Goulburn River National Park.</p> <p>NPWS recommends - Revision of the Addendum Noise and Vibration Impact Assessment, to:</p> <ul style="list-style-type: none"> a. acknowledge noise levels above 40dB(A) have the potential to impact wildlife in the national park. NPWS advises that land reserved under the National Parks and Wildlife Act 1974 is to be treated as a sensitive receiver and noise levels should not exceed 35dB(A). b. re-evaluate generator placement in the layout of the TWA to reduce noise impacts and affects to the national park. c. provide an acoustic (noise) monitoring program to ensure levels are adhered to, and not exceed 35dB(A) on the boundary of the national park. 	<ul style="list-style-type: none"> a. Lightsource bp acknowledges noise levels above 40dB(A) have the potential to impact wildlife in the national park and that the national park will be treated as a sensitive receiver for the purposes of noise level management. b. Lightsource bp commits to minimise noise impacts on the national park by considered placement of the generators proposed as part of the TWA Facility during detailed design. c. Lightsource bp notes that noise associated with the construction and operation of the TWA Facility would be managed in accordance with Construction Noise and Vibration Management Plan (CNVMP) prepared for the broader Project. The CNVMP will include a noise monitoring program to ensure that noise management levels (in accordance with the NSW EPA Noise Policy for Industry, 2017) are adhered to.
NPWS (continued)	<p>Bushfire threat</p> <p>NPWS recommends - Revising the Addendum Bushfire Threat Assessment to include:</p> <ul style="list-style-type: none"> a. consultation with NPWS regarding security of access to existing fire trails within Goulburn River NP. b. consideration of the Goulburn River National Park and Munghorn Gap Nature Reserve Fire Management Strategy NSW Environment and Heritage 4(DEC, 2002) with regard to NPWS fire trail connections. Acknowledge the statutory function that the RFMS fulfils and NPWS responsibilities under s.48(4) and s.44(3) of the Rural Fires Act 1997. c. Recognition of the relevant Fire Access and Fire Trail Plan for this locality, and acknowledge the critical fire trail access as a designated Tactical – Category 9 fire trails and accord with the Fire Trail Standards5 (NSW RFS, 	<ul style="list-style-type: none"> a. Lightsource bp provided a briefing to NPWS to discuss the Amended Project (2) and address any residual NPWS comments on the Amended Project (1) as documented in Section 5.1.1 of the Amendment Report (2). Lightsource bp is committed to ongoing consultation with NPWS. b. Lightsource bp recognises the importance of this recommendation and notes that this would form part of the Bushfire Management Plan (BFMP) which would be prepared following project approval. c. Similarly with response to item b above, this would be addressed in the BFMP. d. Lightsource bp committed to the provision of a 100,000L water supply tank in the Bushfire Threat Assessment prepared to support the Amendment Report (2). Lightsource bp confirm

Agency	Agency Request for Additional Information	Response
	<p>2023) and construction standards subject to Fire-Trail-Design-Construction-and-Maintenance-Manual 6(NSW SCS, 2017).</p> <p>d. adequate mitigation measures to reduce ignition risk, or threat from the TWA during occupation. This should include provision of a 100,000l static water supply specifically designated for firefighting response.</p> <p>e. creation of a (static or floating) legal easement to secure lawful access benefiting NPWS through the property to support access to the national park. NPWS accepts that the roads will be maintained and open at all times via an internal track network from Wollara Road however this is not secured legal access.</p>	<p>this commitment will form part all relevant post-approval management plans, including most notably the Emergency Plan.</p> <p>e. An easement is not feasible, given that tracks will partially traverse the solar farm footprint. Lightsource bp remain committed to providing access to NPWS, which has been advised to only occur a few times a year.</p> <p>Lightsource bp provided NPWS with shapefiles and a map showing indicative access. This will be amended as the Project moves into detail design and any revisions shared with NPWS. Access will be facilitated by agreement with Lightsource bp (or their on-site representatives) through construction and operation.</p> <p>Lightsource bp can issue a licence to confirm rights of access for NPWS during construction and operation, outlining relevant terms (i.e., providing notice, emergency access provisions).</p> <p>Upon decommissioning, Lightsource bp commit to establishing an easement or comparable mechanism to ensure secure long-term access through the Project Area for NPWS.</p>
<p>DCCEE Water</p>	<p>Pre-determination</p> <p>DCCEE Water recommend that the Proponent:</p> <p>a. provide clarification on their ability to obtain the necessary water volumes from the site or confirm a viable supply is available for the construction and operational phases of the project</p> <p>b. Demonstrate sufficient entitlements can be acquired in the relevant water sources unless an exemption applies</p> <p>Post-approval</p> <p>c. Works within waterfront land need to be in accordance with the Guidelines for Controlled Activities on Waterfront Land.</p>	<p>a. As document in the Project EIS and Amendment Report (1), water supply sources would be determined in consultation with suppliers and neighbouring landholders, and are expected to involve a combination of water trucked in through commercial suppliers and the use of neighbouring dams. Where further licenses are needed to access water from these sources or licence amendments are required, these will be secured by Lightsource bp prior to the water being used. A water sourcing strategy would also be developed to ensure there are no water supply impacts to adjacent landowners or other stakeholders, a commitment made in the Amended Report (1). Lightsource bp</p>

Agency	Agency Request for Additional Information	Response
		<p>are confident that water supply will be resolved, based on positive communications with stakeholders to date.</p> <ul style="list-style-type: none"> b. As above, this would be determined in consultation with suppliers and neighbouring landholders, and secured prior to the water being used. c. Noted, all works within waterfront land will be undertaken in accordance with the Guidelines for Controlled Activities on Waterfront Landas outlined as part of the Project EIS and Amendment Report (1 and 2).
FCNSW	<p>FCNSW has reviewed the draft conditions of consent and offers no comments. FCNSW notes that as at the time of writing, FCNSW and Lightsource Development Services Australia Pty Ltd have not agreed to terms necessary to facilitate the upgrade of Wollara Road.</p>	<p>FCNSW and Lightsource bp are in ongoing discussion to resolve terms that will enable upgrades to Wollara Road. These upgrades are not required to support Project traffic and are instead part of the Project's community benefit.</p> <p>Ongoing maintenance of upgraded Wollara Road will be funded through the Project's Voluntary Planning Agreement, which was endorsed by UHSC on 16 May 2024.</p>

3.0 Closing

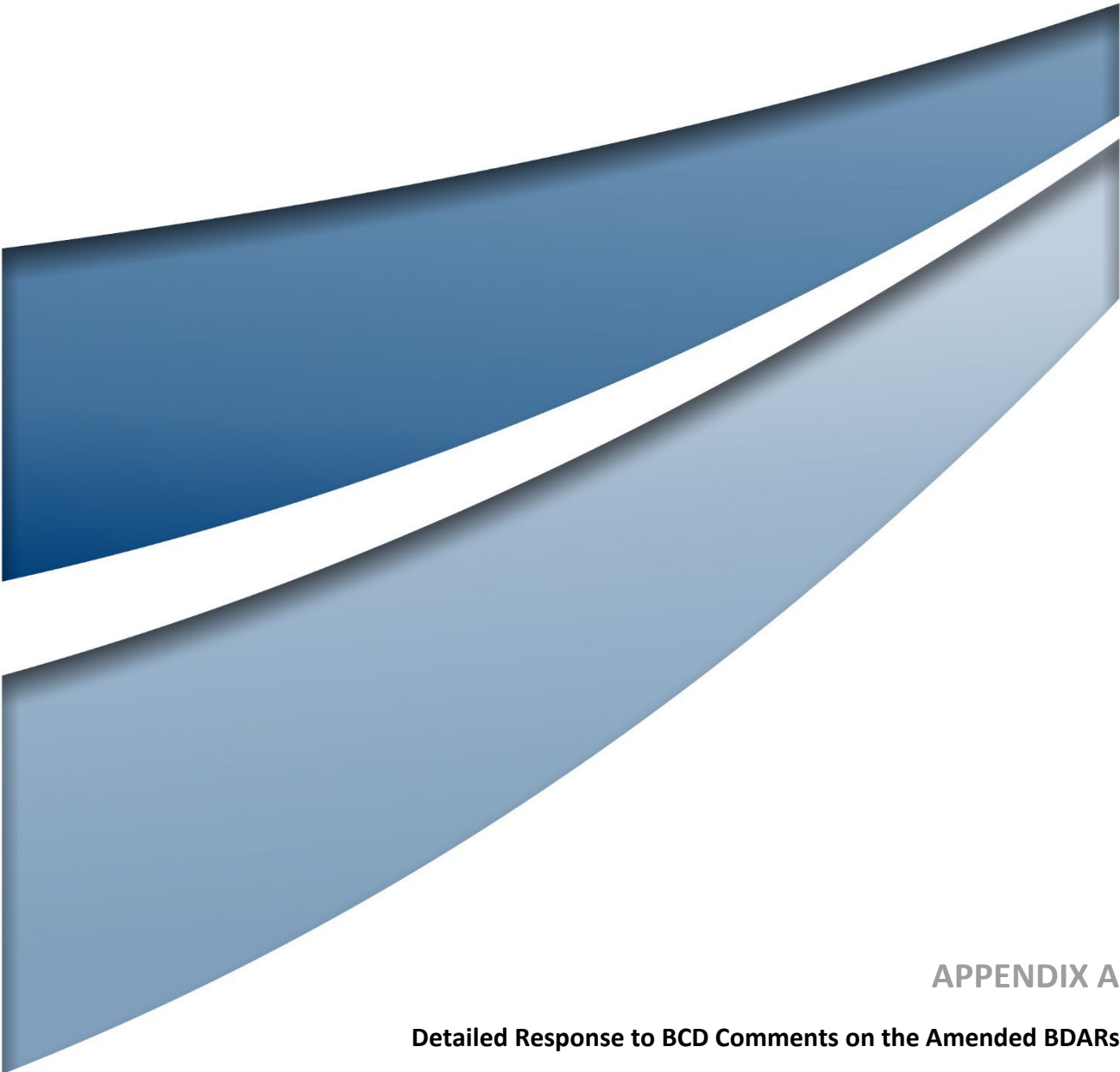
We trust this information adequately satisfies DPHI and agency requirements. Please do not hesitate to contact the undersigned, or Lightsource bp directly via email (beth.kramer@lightsourcebp.com), should you require clarification or further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'T. Buchan', written in a cursive style.

Thomas Buchan
Senior Environmental Consultant

E | tbuchan@umwelt.com.au
M | 0401 452 790



APPENDIX A

Detailed Response to BCD Comments on the Amended BDARs

Appendix A: Detailed response to BCD comments on the Amended BDARs

1. The project is considered likely to result in a Serious and Irreversible Impact to Box – Gum Woodland Critically Endangered Ecological Community (CEEC)

BCS recommended action: Revise the Solar BDAR, in consultation with BCD, to provide additional and appropriate measures for Box Gum Woodland CEEC in accordance with section 7.16(3) of the BC Act.

Project response:

Section 11 of the Solar Farm BDAR describes the proposed Goulburn River Biodiversity Stewardship Site (BSS), which is being established to offset impacts from the Project, including to the BGW CEEC. The BSS application has progressed since the BDAR was submitted and is under assessment at the time of this response. The draft BSS contains 726 ha of BGW CEEC, equating to 1745 credits. The BSS will compensate for approximately 40% of the impacts on BGW CEEC as a result of the Goulburn River Solar Farm Project. The remainder of the BGW CEEC offset liability will be satisfied through management and protection of approximately 800 ha at a BSS within 100 km of the impact area. This means that the 188.5 ha of impacted habitat will be offset by 1,526 ha, at what is an almost 1:8 ratio.

Additional conservation measures were proposed in s9.4 of the Amended Solar Farm BDAR (January 2024).

Furthermore, an ‘additional information’ memo was provided separately to BCD (dated 23rd January) which provided further justification regarding the approach to assessing impacts to Box Gum Woodland CEEC, noting that the:

- offset liability for the project assumed total loss of BGW
- actual direct impacts to PCT 483 (all condition classes) were calculated to be 48.2 ha (7% of all PCT 483 in the footprint)
- results of Lightsource bp’s vegetation integrity (VI) study at Wellington Solar Farm show that VI has been maintained (and in fact, improved) under solar panels during operation to date (2023/24). Justification for likely retention of DNG PCT 483 VI at Goulburn River Solar Farm during operation was also provided in s8.1.2.1 of the Amended Solar Farm BDAR.

The Project will impact on **23.14 ha** of the woodland form of BGW CEEC. This comprises:

- 22.49 ha (Solar Farm)
- 0.65 ha (Public Roads and Culverts).

Additionally, the Project will impact on:

- 165.36 ha of moderate condition BGW DNG (Solar Farm)
- 509.13 ha (cumulative; Solar Farm and Public Roads and Culverts) of exotic dominated/low/low to moderate condition DNG which does not meet the biodiversity offset scheme (BOS) threshold.

Additional conservation measures for the BGW CEEC are proposed as:

- Commitment to rehabilitate 23.14 ha of BGW DNG (PCT 483) within the proposed Goulburn River BSA to a woodland state and to protect this area in perpetuity.

- The quantity of revegetation is based upon a ratio of 1:1 to the area of impact.
- The location of revegetation is proposed within the BSA, in order to be local to the impact and to ensure protection in perpetuity.

The BAM assessment of DNG PCT 483 at Goulburn River Solar Farm is based on plot data obtained during a period of unusually warm and wet conditions (as described in s4.5.1 of the Amended Solar Farm BDAR), with the impact assessment based on elevated condition scores, in comparison to the current site conditions. Additional site photos have been provided herein (refer to **Appendix B**), visually showing a further reduction in DNG condition in recent months. This further demonstrates that the BDAR has been based on a precautionary ‘best case scenario’ and that significantly less area of DNG would have been likely to meet the BOS threshold, had plot surveys been completed during more representative climatic conditions.

Lightsource bp commit to the following measure relevant to BGW DNG:

- Commitment to research to determine whether BGW DNG can be maintained with a vegetation integrity score greater than zero.

Lightsource bp would undertake a study of vegetation integrity (VI) pre- and post- construction, to test the hypothesis of whether the installation and operation of solar panels results in a substantial change to the VI score for low / low to moderate / moderate condition derived native grasslands (specifically, PCT 483).

2. The project is considered likely to result in a Serious and Irreversible Impact to the regent honeyeater

BCS recommended action: BCS considers that the project is likely to result in a Serious and Irreversible Impact to regent honeyeater. The proponent should provide further information detailing the specific size and condition of the BSS proposed as an additional and appropriate measure.

Project response:

Additional conservation measures were provided in s9.4 of the Amended Solar Farm BDAR (January 2024) and were determined in collaboration with the BCS approved regent honeyeater species expert. Dr Ross Crates is recognised as one of two biodiversity experts for this species by the Secretary, in accordance with s5.3 (Box 3) of the BAM. Dr Ross Crates considered the Project Area to be marginal foraging habitat for Regent Honeyeater, however BCS (In their advice dated 28th May 2024) have a differing opinion to the findings of their approved species expert, believing the site to be potential breeding habitat.

BCS requested further information on the area of the proposed BSS which will be set aside as compensation for impacts along with details of the size and condition of the BSS. Lightsource bp propose to retire the obligated number of species credits within the BSS (1,424 for the solar farm, plus nine (9) credits for the public roads and culverts, to a total of **1,433** credits). This equates to an area of more than 330 ha which will be managed for conservation in perpetuity, to offset the 42.46 ha impacted (across the solar farm and the public roads). The offset provided is at a ratio close to 20:1.

Information on the size and condition of the BSS were provided in s11.3 of the Amended Solar Farm BDAR. The expert report for this species (Appendix H, Amended Solar Farm BDAR) concludes that the BSS provides much higher quality foraging habitat than does the impact site, despite also having a similarly low likelihood of the species being present.

The proponent is committed to providing additional conservation measures for Regent Honeyeater. As concluded by Dr Crates (Appendix H, Amended Solar Farm BDAR), offsite measures would offer the greatest benefit to the species. This will take the form of financial support (\$25,000 pa) over a fixed time period (five years) for one (or more) of the following programs:

- **Noisy Miner management** in known Regent Honeyeater breeding areas. A sustained management approach for five years would be expected to suppress Noisy Miner presence in nearby areas along Goulburn River, and to prevent recolonisation.
- **Habitat restoration** by planting within nearby areas subjected to Noisy Miner management would be beneficial for long-term species' management, with yellow box *Eucalyptus melliodora* of highest priority, along with secondary species including Blakely's red gum *E. blakelyi*, Manna gum *E. viminalis* and rough-barked apple *Angophora floribunda*. Approximately 2,500 tube stock could be planted each year for five years as a result of Lightsource bp's proposed support.

3. Threatened microbats have not been adequately considered or surveyed at the Goulburn River Solar Farm site

BCS recommended action: The large-eared pied-bat and eastern cave bat each require an SAI assessment in accordance with Section 9 of the BAM.

Project response:

The justification on the Project's approach to large-eared pied-bat and eastern cave bat remains relevant, as provided in Section 5.3 of the Amended BDAR.

No breeding activity was observed within the buildings searched at the Solar Farm, despite records for the species on the BSA site around the same time as surveys were being carried out on the Solar Farm. Furthermore, all areas of suitable rocky habitat suitable for breeding have been avoided, inclusive of a 100m protection buffer. As such, the Project is not expected to have any direct or indirect impacts on potential breeding habitat for the species.

Section 9.1.2 of the BAM requires a further assessment of potential direct and indirect impacts on threatened species with the potential for SAI. As the Project is not expected to have any direct or indirect impacts on potential breeding habitat, an assessment of SAI not required for large-eared pied-bat and eastern cave bat.

BCS recommended action: Additional microbat surveys are required in accordance the 'Species credit threatened bats and their habitats: NSW survey guide for the Biodiversity Assessment Method'.

Project response:

Survey is considered adequate, as agreed to by BCD. Survey effort was provided to BCD for comment (28th September 2023) (Undertake four additional nights of fly-out ultrasonic call recording surveys at the dilapidated building and shed in the northeastern section of the Project Area).

BCD response (19th October 2023) was that 'BCD accepts the use of ultrasonic call recordings'. At this time, BCD also referenced that the OEH (2018) states (on page 15) that 'Acoustic detectors may be used; however, this method does not allow for reproductive status to be identified. If acoustic detectors are the only survey method used and the target species is detected, breeding must be assumed and mapped'. This

was not required within the Goulburn River Solar Farm Development Footprint, as the target species was not detected within the structures considered to be potential roosting habitat.

The dilapidated dwelling in the north-eastern section of the site will be retained and not impacted. This dwelling is located in an area surrounded by cleared paddocks. The sheds in the south-western section of the site have walls and roofs constructed with metal sheet material and do not contain roof or wall cavities suitable for roosting. Searches of the sheds present did not identify any roosting bats or areas suitable as breeding roost habitat, due to a lack of wall and ceiling cavities and the sheds being permanently open on at least one side, resulting in solar exposure throughout the day.

Suitable buffers (>100m) have been provided to all areas of natural habitat which have potential to support breeding sites for these species (caves and overhangs).

It should be noted that large-eared pied bat and eastern cave bat were recorded within the BSA site. Both species were assumed present in associated PCTs within the BDAR and species polygons generated in accordance with (OEH (2018)). The species polygons did not intersect with the Development Footprint, and as such, offsets were not required for these species.

BCS recommended action: The proponent provide detail in regard to survey effort used for roost surveys, including acoustic data and GIS data (including the time and date of each active search).

Project response:

Survey details are provided in Table 2.8 of the Amended Solar Farm BDAR.

GIS data, inclusive of time and date of each active search, was provided to BCD via email on 1 February 2024. No sightings or acoustic recordings of microbats were obtained during roost surveys, therefore there are no acoustic files.

BCS recommended action: Should the proponent fail to provide the above information; they should provide species polygons for large-eared pied-bat and eastern cave bat in accordance with the BAM

Project response:

See responses above.

Areas of associated PCTs and potential breeding habitat for these species were mapped in Figure 5.3 and Figure 5.4 of the Amended Solar Farm BDAR. Associated PCTs and buffers to potential breeding habitat did not overlap with the Development Footprint.

4. The striped legless lizard (*Delma impar*) has not been appropriately considered or surveyed for at the Goulburn River Solar Farm site

BCS recommended action: The proponent should complete surveys for the striped legless lizard (*Delma impar*) in accordance with the Threatened reptiles – Biodiversity Assessment Method survey guide. The proponent should also make concentrated efforts within rocky areas with moderate grass cover (including exotic grass cover).

Project response:

The justification on the Project's approach to *Delma* spp. remains relevant as provided in Section 5.3 of the Amended BDAR, along with the expanded discussion on this matter in the letter provided to BCS (Additional Information to support Goulburn River Solar Farm Biodiversity Assessment – SSD3396453; dated 23rd January 2024).

- Surveys at the solar farm were completed prior to the publication of DPE (2022) and therefore the new guideline does not apply. This is in accordance with BOS Update 36 (See Item 4 Assessor update 36 (nsw.gov.au)) and Page 46 of the BAM Stage 1 Guideline (Biodiversity Assessment Method Operational Manual – Stage 1 (nsw.gov.au), which state that where survey has been completed prior to the publication of a new or revised survey guide, the department expects the assessor (or surveyor) to have applied current best-practice in searching for the target species.
- Surveys were done in accordance with the published, peer-reviewed guidelines at the time (DSEWPC, 2011). These Commonwealth government guidelines can reasonably be considered to be best practice.

5. The proponent has not adequately demonstrated survey effort for threatened fauna surveys within the proposed solar farm

BCS recommended action: Provide shapefiles displaying the location and length of stag watching surveys. The proponent must monitor potential nest locations for forest owl species for a minimum of two nights.

Project response:

Stag watch surveys are point based and do not have a mappable distance / length. Spatial data showing the location of stag watching surveys were provided to BCD in early 2024.

BCS recommended action: Conduct targeted surveys for pink-tailed legless lizard (*Aprasia parapulchella*) in accordance with the Threatened reptiles – Biodiversity Assessment Method survey guide.

Project response:

New item – this was not identified in BCD advise on the EIS BDAR.

As per *Delma* spp., surveys were undertaken in accordance with the guidelines at the time (Cwth; DSEWPC, 2011). The guidelines referenced in the current advice were introduced after the completion of surveys for this species and compliance with the new guideline is therefore not required under the BAM.

BCS recommended action: Complete additional targeted surveys for squirrel glider (*Petaurus norfolcensis*) using either

- spotlighting AND cage trapping, or
- spotlighting AND camera trapping, are considered acceptable.

Project response:

An adequate level of both spotlighting and camera trapping was conducted as part of the EIS BDAR. BCD do not have any published survey guidelines for this species. The methods applied during surveys include both spotlighting and camera trapping as described the BDAR and further summarised below:

- Baited arboreal camera trapping 1 February 22 to 10 March 22, 30 cameras x 36 nights (1080 trap nights).

- 12 nights of spotlighting between 2021 and 2023, incorporating 80 person hours.
- Thermal drone surveys undertaken by Wildlife Drones & Ripper Corp covering all areas of the site with canopy vegetation, completed over two nights during 2023 with thermal camera and spotlight.

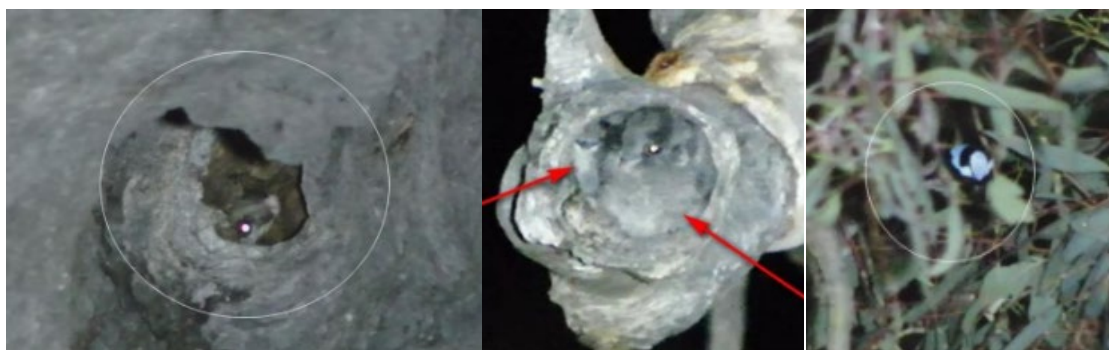
The Development Footprint contains <30 ha hectares of scattered trees with generally no understorey shrubs and provides highly disturbed and fragmented low-quality potential habitat. The nearest record of this species is approximately 20 km to the west of the Project Area. The solar farm has low potential to provide suitable habitat for the Squirrel Glider due to large expanses of cleared derived grassland surrounding the scattered trees present, which limit opportunities for gliding and foraging. Baited remote camera survey sites were targeted to locations within proximity to larger connected patches of vegetation which have potential connectivity for the Squirrel Glider. Spotlighting surveys significantly exceeded the DEC (2004) survey effort recommendation for spotlighting of two surveys for an hour on two separate nights up to 200 ha of stratification.

Guidance for camera trapping effort from the EPBC Act Threatened Mammal survey guidelines recommends 140 camera trap nights (10 cameras x 14 nights) per 1 ha stratification unit for a 5 ha survey area. Extrapolated for a survey area of approximately 30 ha, this equates to 840 trap nights. The camera trapping survey effort completed by Umwelt exceeded this and equated to 1080 trap nights.

The thermal drone surveys were a supplementary survey method and successfully identified non-threatened hollow-dwelling fauna (Common Brushtail Possum, Australian Owlet-nightjar; Figures 1 & 2), roosting parrots (Sulphur Crested Cockatoo, Galah, Eastern Rosella) and Superb Fairywren (Figure 3), suggesting that gliding mammals would have had a high likelihood of being observed, if present. Note also that thermal drones have been shown as being more effective at detecting gliding mammals than spotlighting (Vinson et al., 2020). Squirrel Glider was successfully surveyed for on another Lightsource bp solar farm project (in Central Queensland) in April 2024, using a combination of thermal drone and spotlighting to confirm identification.

Notwithstanding that survey effort is considered to be commensurate with the likelihood of this species occurrence, the Amended BDAR provided justification for excluding Squirrel Glider from further assessment (s. 2.4.4, s.5.1.2.2):

- Absence of suitable habitat
- Not associated with any PCTs present (i.e., not triggered by the BAM-C)
- Assessed in the EIS BDAR on a precautionary basis.
- Survey effort considered sufficient to demonstrate absence.
- Able to be excluded as a candidate species in accordance with the BAM.



Figures 1-3: Hollow dwelling fauna and blue wren, observed during thermal drone surveys at Goulburn River Solar Farm.

6. Threatened fauna surveys severely inadequate at the proposed road upgrade

BCS recommended action: Additional surveys are required for the proposed road upgrade to fulfil BAM requirements for the pink-tailed legless lizard, striped legless lizard, pale-headed snake and microbats. Species surveys should be conducted in accordance with relevant guidelines and the TBDC. Any proposed deviations from species survey must be approved by BCD.

Project response:

Surveys carried out for the Pink-tailed Legless Lizard within the Road Upgrade area were consistent with those prescribed within relevant survey guidelines.

Surveys for Pink-tailed Legless Lizard were stratified to associated PCTs and locations which have suitable rocks for turning. The 13.17 ha works area assessed includes the existing road surface which does not provide any potential habitat and only 4.86 ha of areas assessed as containing vegetation are present. Rolling 200 rocks x 4 replicate surveys at each of three survey locations is considered to be an adequate level of survey for this species for the area of suitable habitat within the works area, in accordance with the guidelines.

It is acknowledged that surveys for *Delma* spp. for the public roads BDAR were completed following the release of BAM guidelines for threatened reptile surveys (DPE 2021), which require either pitfall trapping or tile surveys. Given the disturbed nature of the roadside, the rocky hard ground, and the likelihood of trap tampering along the public road, Umwelt determined that pitfall trapping and/or tile surveys were not feasible, seeking feedback from BSC. The Project team were unable to contact the BSC Accountable Officer.

Lightsource bp will therefore assume presence for *Delma impar* within the 3.75 ha of potential habitat in the road development footprint. This equates to 27 credits as presented in **Table A.1** below.

Table A.1 *Delma* spp. credit requirements

PCT	PCT Zone	Vegetation Integrity (VI)	Area (ha)	Species credits
3388	Remnant Trees	51.8	0.36	7
483	Exotic Grass	9.9	3.1	12
483	Remnant Trees	86.1	0.2	6
1691	Remnant Trees	67.9	0.09	2
Total Credits				27

Pale-headed Snake and candidate microbat species were assessed as assumed present and credits were calculated for assumed impacts, in accordance with the BAM.

7. Further justification for the plant community type (PCT) 1691.

BCS recommended action: The Road Upgrade BDAR should include further justification for selecting PCT 1691 in accordance with the NSW PCT classification as described in the BioNet Vegetation Classification.

Project response:

This relates to four credits of Narrow-leaved Ironbark-Grey Box Grassy Woodland, which is also considered to be part of the Box Gum Woodland CEEC and therefore has already been accounted for within the Project's assessment of SAIL.

Both PCT 483 and PCT 1691 correspond to the Box Gum Woodland TEC (formally listed as White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland). Both PCT 483 and PCT 1691 include *Eucalyptus moluccana* intergrades with *Eucalyptus albens* in the upper Hunter (*Eucalyptus albens* <-> *moluccana*), as identified in the BioNet Vegetation Classification (see extract below for PCT 1691). The presence of *Eucalyptus albens* <-> *moluccana* is not unique to PCT 483.

A large area of PCT 1691 is mapped directly adjoining the road upgrade area (Wollara Road to southern boundary of Tongo State Forest section) on the published NSW State Vegetation Map (NSW Government 2023). This NSW Government mapping underpins the NSW PCT classification and the NSW BioNet Vegetation Classification. PCT 483 is not mapped within or adjoining Plot 10 or the areas mapped in the Road Upgrade BDAR as PCT 1691.

The plot completed within PCT 1691 recorded six species characteristics of PCT 1691 (*Austrostipa verticillata*, *Brachychiton populneus*, *Dichondra repens*, *Eremophila debilis*, *Eucalyptus albens* <-> *moluccana*, *Notelaea microcarpa*) and only three species characteristic of PCT 483 (*Bothriochloa macra*, *Chloris truncata* and *Eucalyptus albens* <-> *moluccana*). The vegetation community sampled within Plot 10 is therefore considered to be floristically more similar to PCT 1691 than PCT 483.

The correspondence provided by BCD refers to *Notelaea macrocarpa*, which is not a known species and presumably a spelling error. *Notelaea microcarpa* was observed within Plot 10, which sampled this PCT.

Umwelt remain confident in their assessment of this areas as PCT 1691.

8. Additional information is required for Bluegrass (*Dichanthium setosum*)

BCS recommended action: The proponent should provide information outlined in Section 5.2.2 of the BAM to justify excluding Bluegrass (*Dichanthium setosum*) from further assessment. If the proponent cannot provide sufficient information, it should complete surveys in line with the Surveying threatened plants and their habitats guideline and the Threatened Biodiversity Database Collection (TBDC).

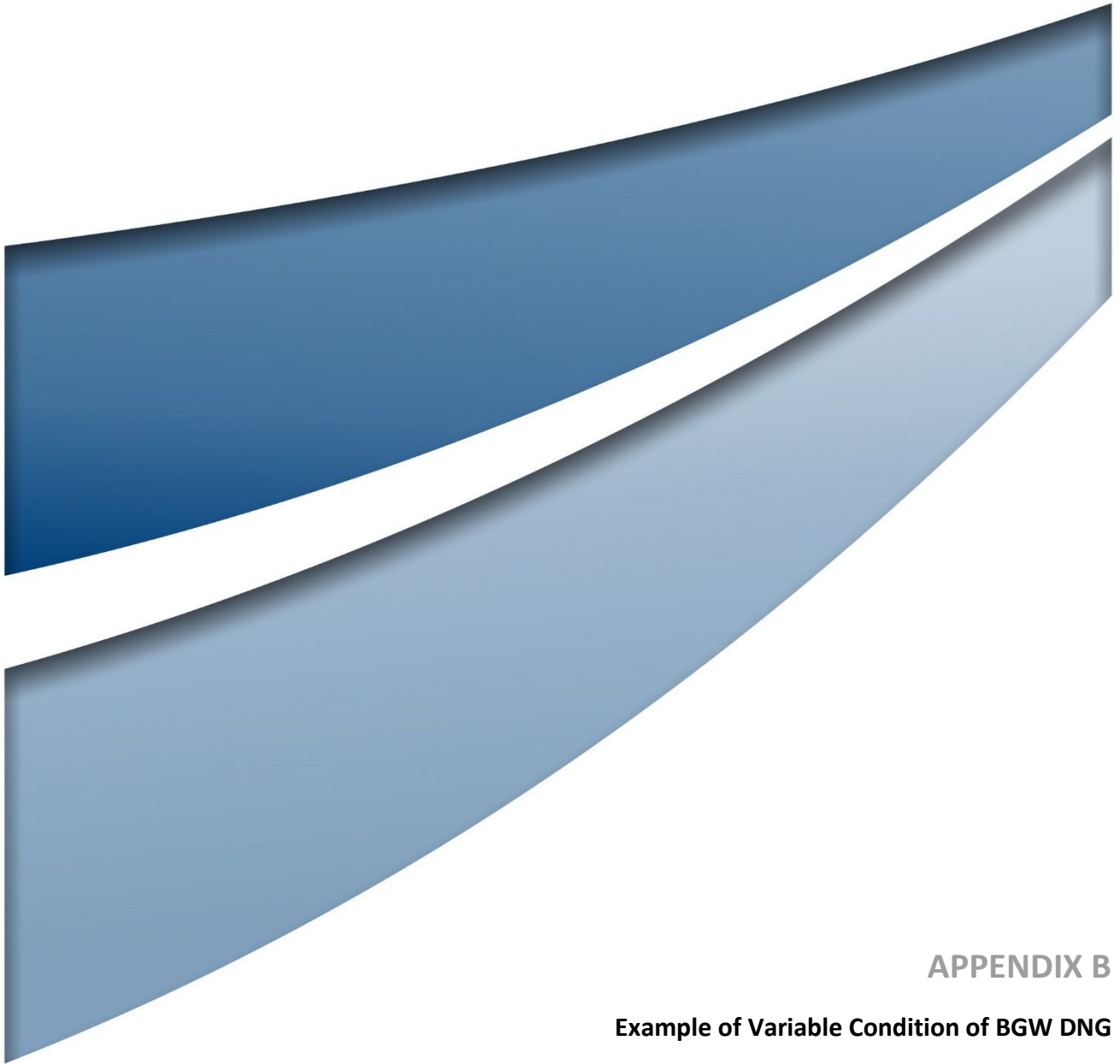
Project response:

It has been assumed that this comment relates to the Solar Farm Site. New item – this was not identified in BCD advice on the EIS BDAR during RtS phase.

Dichanthium setosum is not associated with the IBRA Subregion within which the Solar Farm occurs and is not associated with any of the PCTs recorded within the Project Area. The Project Area is also located

outside of the known and predicted distribution of this species mapped in the NSW Government Bionet Atlas. As such, in accordance with S5.2.1(3) of the BAM, no further assessment for this species is required.

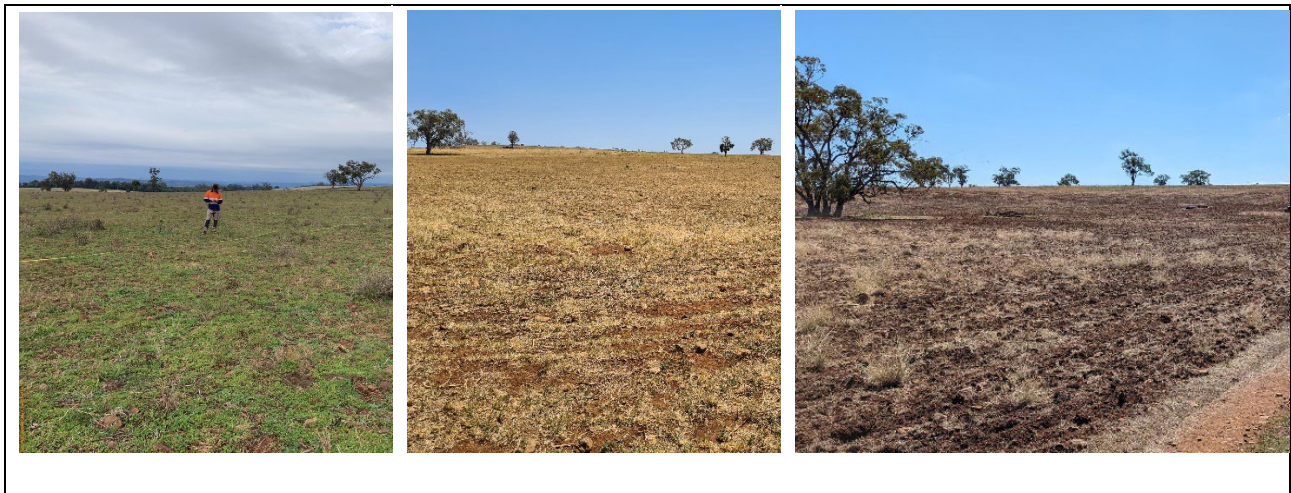
Dichanthium setosum was also considered within the MNES Report included as Appendix A of the BDAR and found to have a low likelihood of occurrence based on the Project Area occurring within an IBRA Bioregion that the species is not known or predicted to occur within.



APPENDIX B

Example of Variable Condition of BGW DNG

Example of Variable Condition of BGW DNG



February 2022 to February 2023

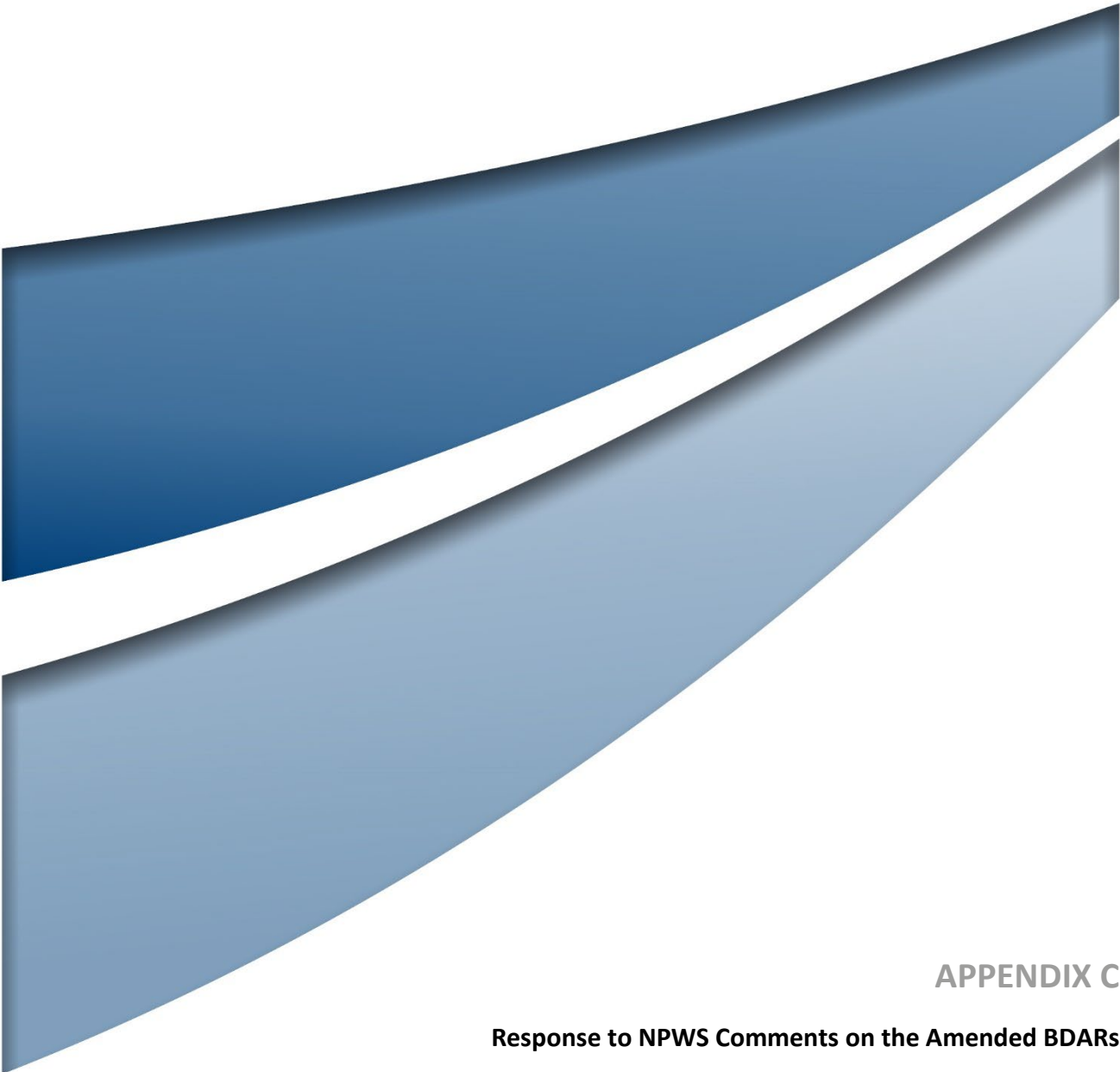
Low condition PCT 483 DNG at the time of the BAM plots (and VI score assessment), during an extended La Nina weather event with high rainfall and warm weather. This condition state has been used as the basis for assessment under the BAM.

October 2023

Low condition PCT 483 DNG following a period of low rainfall.

March 2024

Low condition PCT 483 DNG following seeding by the farmer (as a continuation of standard agricultural land management activities).



APPENDIX C

Response to NPWS Comments on the Amended BDARs

Item	NPWS Recommended Action	Summary of Response
NPWS recommends revising the EIS to:		
1.1	Justify and confirm the exclusion of roads that encroach onto the national park gazetted boundary from the SSD, and that no likely works are required to these sections of Ringwood and Wollara Roads to support access for construction and operation of the SSD.	<p>No upgrade works are required for the portion of public road (Ringwood and Wollara Roads) adjacent to the National Park.</p> <p>Dilapidation surveys will be conducted throughout construction, with Upper Hunter Shire Council (UHSC) in agreement about continuing their standard maintenance approach to this stretch of road (as per meeting between Lightsource bp and UHSC officers 28th May 2024), using funds from the Project's Voluntary Planning Agreement.</p>
1.2	Include the entirety of the road works associated with establishing and operating the project as part of the SSD EIS, for works affecting GRNP. This will require seeking landowner consent from the NSW Minister for the Environment, as the legal owner of the land in accordance with the Large-Scale Solar Energy Guideline (DPE 2022).	No road works are required for the portion of public road adjacent to the National Park to establish or operate the Project.
NPWS Recommends the following Conditions:		
2.1	Resolution of the Wollara Road and Ringwood Road corridor alignment issues	<p>Lightsource bp, NPWS and DPHI met to discuss the discrepancies with the corridor alignment on the 12th October 2024. At this time, Lightsource bp and NPWS acknowledged that this is primarily an issue for UHSC and that there will be complications with private property and Crown land (travelling stock reserves). It was also acknowledged that any efforts to amend the cadastre could take 12-18 months, and are therefore not possible to achieve prior to construction of the Project.</p> <p>Lightsource bp remain committed to ongoing discussion with UHSC and providing advice (legal/survey engineering) on the necessary process to achieve re-alignment of the cadastral boundary. These discussions were progressed with UHSC on 28th May 2024.</p>
2.2	Require the proponent to provide NPWS access, via an easement, to Goulburn River NP, for park management purposes.	<p>Construction and operation:</p> <p>An easement is not feasible, given that tracks will partially traverse the solar farm footprint. The creation of new tracks is not practical, as this would have additional biodiversity impacts and would also impact on the proposed BSS.</p> <p>Lightsource bp remain committed to providing access to NPWS, which has been advised to likely only be a few times a year.</p> <p>Lightsource bp previously provided NPWS with shapefiles and a map showing indicative access. This will be amended as the Project moves into detail design and any revisions shared with NPWS. Access will be facilitated by agreement with Lightsource bp (or their on-site</p>

Item	NPWS Recommended Action	Summary of Response
		<p>representatives) through construction and operation.</p> <p>Lightsource bp can issue a licence to confirm rights of access for NPWS and outline relevant terms (i.e., providing notice, emergency access provisions).</p> <p>Decommissioning:</p> <p>Lightsource bp commit to establishing an easement or alternative mechanism to ensure secure long-term access through the Project Area for NPWS.</p>
2.3	Ensure NSW National Parks and Wildlife Service is included as a key stakeholder in the development, and implementation of the Emergency Plan for the site. Ensure the Goulburn River National Park and Munghorn Gap Nature Reserve Fire Management Strategy] or equivalent plan is considered during the preparation of the Emergency and Bushfire Management Plans.	Noted, agreed.
2.4	Ensure the preparation of the Construction Environmental Management Plan (CEMP), and any relevant subplan are referred to NSW National Parks and Wildlife Service as a key stakeholder.	Noted, agreed.
2.5	Ensure the preparation of the Operational Environmental Management Plan (OEMP), and any relevant subplan are referred to NSW National Parks and Wildlife Service as a key stakeholder.	Noted, agreed.
NPWS recommends revising the Amendment Report to:		
3.1	Provide clarity and consistent information on the level of works proposed to Wollara and Ringwood Roads, based on a road survey, road alignment and tenure assessment, to meet the SSD needs around access and proposed works under the EIS.	<p>No road works are required for the portion of public road adjacent to the National Park.</p> <p>Lightsource bp remain committed to ongoing discussion with UHSC and providing advice (legal/survey engineering) on the necessary process to achieve re-alignment of the cadastral boundary.</p>
3.2	Justify the exclusion of the portions of the Wollara and Ringwood Road network from the overall SSD EIS works or upgrades as stated in the Amendment Report (and submitted RTS).	No road works are required for the portion of public road adjacent to the National Park.
3.3	Update the Figures in the Amendment Report to consistently identify the national park and its gazetted boundary.	Not considered to be necessary, as no road works are required for the portion of public road adjacent to the National Park.
3.4	Clearly describe the impacts of the SSD on the national park, as required consider the statutory implications of development access, and works occurring on, or across land reserved under the NPW Act.	Whilst noting that no road works are required for the portion of public road adjacent to the National Park, s4.1.2 of the Project Response to Submissions Report (December 2023) included an assessment of impacts on the national park.

