





This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any convright

Ricardo Energy Environment & Planning ABN 80 605 049 054

> ee.ricardo.com Our reference 30866 / Issue 1

23 December 2021

Re: RESPONSE TO THE DEPARTMENTS REQUEST FOR FURTHER INFORMATION SP477735 PLANNING PERMIT APPLICATION NO PA2101365 FULHAM SOLAR FARM

Dear Lucas,

Ricardo Energy Environment & Planning acts on behalf of Solis RE regarding the subject site at Hopkins Road, Fulham.

## **1** Introduction

We write in response to your letter dated 18 October 2021 requesting further information, in regards to the proposed solar energy facility at the above address, Planning Permit Application No. PA2101365.

Plans and supporting documents lodged in response to the Department's requested further information letter include:

- Amended Flora and Fauna Assessment prepared by Nature Advisory
- VQA (Habitat Hectare) Competency Check Felicity Smith
- VQA (Habitat Hectare) Competency Check Verity Fyfe

# 2 Further Information Requested

Our response to each of the matters raised in the Department's requested further information letter as follows.

1. Information about the native vegetation to be removed, including an amended Department of Environment, Land, Water and Planning generated Native vegetation removal report that includes all the native vegetation proposed to be removed:

The relevant NVR report can be found in Appendix 6 of the assessment. No native vegetation will be impacted by the proposed Settlement Road grid connection, therefore an NVR report is not required in Report '15b. Flora and Fauna Assessment Hopkins and Settlement Road (Grid Connection)'.

Victoria Head office Level 4 3 Bowen Crescent Melbourne Victoria 3004 PO Box 33298 Melb 3004 T: +61 (0) 3 9978 7823 E: plc.admin@ricardo.com New South Wales office Suite 2.01 Level 2 Tower B, The Zenith 821 Pacific Highway Chatswood NSW 2067 T: +61 (0) 2 9258 1160 E: plc.admin@ricardo.com Queensland office Level 54 One One One Eagle Street 111 Eagle Street Brisbane Qld 4000 T: +61 (0) 7 3012 6322 E: plc.admin@ricardo.com 2. Amended native vegetation removal and retention plans that clearly show all the native vegetation to be removed, including scattered trees.

All native vegetation removal is clearly marked in red in "Figure 2: Native vegetation to be removed" of the assessment. It is noted that no scattered trees were present on site, reference to two scattered trees in the planning report was incorrect and a typographical error.

3. Recent, dated photographs of the native vegetation to be removed.

Dates have been added to the relevant photographs in Appendix 4 and to site photographs.

- 4. An amended avoid and minimise statement. The statement must describe all efforts to avoid the removal of and minimise the impacts on the biodiversity and other values of native vegetation, and how these efforts focussed on areas of native vegetation that have the most value. The statement should include a description of the following:
  - a. Strategic level planning any regional or landscape scale strategic planning process that the site has been subject to that avoided and minimised impacts on native vegetation across a region or landscape.
  - b. Site level planning how the proposed use or development has been sited or designed to avoid and minimise impacts on native vegetation.
  - c. Why no feasible opportunities exist to further avoid and minimise impacts on native vegetation without undermining the key objectives of the proposal

The avoid and minimise statement has been amended to describe all effort of to avoid the removal of and minimise the impacts on the biodiversity and other values of native vegetation. In addition, we note the following:

- As the site has been historically cleared and is highly modified from the original state, the majority of vegetation of site is classified low quality vegetation.
- All of the native grassland to be removed is 'very low quality native vegetation' with condition scores (out of 100) ranging from 21 to 27. In an effort to minimise the loss of native vegetation, the highest rated patches, located in the south east corner, have been retained in addition to vegetation present on the roadsides. Noting, all new vehicular access points avoid any roadside native vegetation patches.
- The project will provide the appropriate offset to compensate for the biodiversity impact from the removal of the native vegetation. Whilst this offset will account for the total removal, a majority of the vegetation will be retained and sit beneath the solar panels. There is increasing evidence showing that solar panel infrastructure and plant species can coexist and create a mutually beneficial relationship. The panels collect condensation which in turn drips down to the vegetation below providing an important source of water.
- Retention of the lowest quality native vegetation was not possible as there were no feasible
  opportunities to further avoid and minimise impacts on native vegetation without undermining the
  key objectives of the proposal. The solar panels are installed in rows of 'solar tables' of which the
  length is 105m. Accordingly to retain a 1m x 1m patch, the site would lose approximately 87 solar
  panels.
- In addition to providing an offset for the removal of native vegetation, a 5 metre wide landscape buffer will be planted around the perimeter of the site. With a total area of 29,226m2, the buffer will consist of over 30,000 indigenous trees, shrubs, grasses, and groundcover. The buffer will be maintained and protected as appose to the grassland which is currently used as grazing land. The buffer will improve the native vegetation diversity on the site and will provide a greater habitat opportunity for local wildlife.
- It is also noted that the solar farm has an expected operation life of approximately 35 years. A
  decommissioning plan requires the land to be turned back to its original state after the use has
  ceased.

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any convright



- 5. An offset statement providing evidence that an offset meeting the offset requirements for the native vegetation to be removed, has been identified and can be secured in accordance with the Guidelines. A suitable statement includes evidence that the required offset.
  - a. is available to purchase from a third party, or
  - b. will be established as a new offset and has the agreement of the proposed offset provider, or
  - c. can be met by a first party offset.

An offset statement providing evidence that an offset meets the relevant requirements and is available, can be found in Appendix 7

6. Copies of the Vegetation Quality Assessment (VQA) and field data sheets that informed the habitat hectare summary table:

VQA field sheets can be found in Appendix 8

7. The name/s of the person/s who did the VQA and evidence that they were DELWP accredited at the time of assessment.

A copy of the DELWP VQA Certificate of Competency for the relevant staff members has been attached to this email. Please note that although the VQA certification is beyond the expiry date DELWP NV Support have extended all such accreditation until further notice as accreditation could not occur during the Covid lockdowns

### 3 Closure

We thank the Department for the opportunity to respond and trust that the information provided appropriately addresses the Request for Further Information.

However, should you have any questions please do get in touch with Ben Corley on

Yours sincerely,

#### **Ricardo Energy Environment & Planning Pty Ltd**



Catherine Sherwin Senior Associate



Ben Corley Consultant - Planning

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any convright

# ADVERTISED PLAN