



TRANSCRIPT OF MEETING

RE: SUNDOWN SOLAR FARM (SSD-8911)

DEPARTMENT MEETING

COMMISSION PANEL: SARAH DINNING (Chair)
MICHAEL WRIGHT

OFFICE OF THE IPC: JANE ANDERSON
GEOFF KWOK

DEPARTMENT OF
PLANNING, HOUSING
& INFRASTRUCTURE: IWAN DAVIES
ANDREW MCINTYRE
KIRSTY VOGEL

LOCATION: ZOOM VIDEOCONFERENCE

DATE: 2:30PM – 3:30PM
MONDAY, 29th JUNE 2026

THE MEETING COMMENCED

MS SARAH DINNING: Good afternoon. Thank you for coming, welcome. Before we begin, I would like to acknowledge that I'm speaking to you from Gadigal land and I acknowledge the traditional owners of all the lands from which we virtually meet today and pay my respects to their Elders past and present.

Welcome to the meeting today to discuss the state significant development application for the Sundown Solar Farm (SSD-8911) currently before the Commission for determination. The Applicant, Sundown SF Subco Pty Ltd, a subsidiary of Recurrent Energy (Australia) Pty Ltd, proposes to develop a 360-megawatt solar farm and an associated 150-megawatt/600-megawatt hour battery energy storage system in the Inverell Shire local government area.

The project site is located approximately 30 kilometres east of Inverell and 38 kilometres west of Glen Innes within the New England Renewable Energy Zone. My name is Sarah Dinning and I am the Chair of this Commission Panel. I'm joined by my fellow Commissioner, Michael Wright. We're also joined by Jane Anderson and Geoff Kwok from the office of the Independent Planning Commission.

In the interests of openness and transparency and to ensure the full capture of information, today's meeting is being recorded, and a complete transcript will be produced and made available on the Commission's website. This meeting is one part of the Commission's consideration of this matter and will form one of several sources of information upon which the Commission will base its determination.

It is important for the Commissioners to ask questions of attendees and to clarify issues whenever it is considered appropriate. If you are asked a question and are not in a position to answer, you may take the question on notice. Following the meeting, the Commission will advise you in writing of any questions taken on notice that the Panel considers require a formal response. Any subsequent response or information provided to the Commission will then be published on our website.

I request that all participants here today introduce themselves before speaking for the first time, and for all members to ensure they do not speak over the top of each other, to ensure accuracy of the transcript.

So, we'll begin with you, Department, with introductions, and I understand you have a presentation for us. Thank you.

MR DAVIES: That's correct. Thanks so much, Chair, and apologies I was a few minutes late. Good afternoon, my name is Iwan Davies. I'm the Director for Energy Assessments at the NSW Department of Planning, Housing and Infrastructure. I'm joined today by my colleagues, Andrew McIntyre and Kirsty Vogel. Yes, just Andrew and Kirsty.

I'd like to first acknowledge the traditional custodians of the land on which we meet today and pay my respects to their Elders past and present and to any Aboriginal and Torres Strait Islander people joining us.

I'll give a brief overview of the Department's assessment and the key issues, including those on the Commission's agenda, and the reasons for the Department's recommendation to approve the project.

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Can I just check we are – Kirsty, are you able to share ...

MS VOGEL: I can share, yes. Okay. Can everyone see that?

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MR DAVIES: Yes. If you could move onto slide 3. So, project overview. As the IPC has just set out, the subject, the proposed Sundown Solar Farm is a 360 megawatt solar farm and 150 megawatt/600 megawatt-hour battery located between Inverell and Glen Innes in the Inverell Shire local government area within the New England Renewable Energy Zone.

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This slide shows the project site – if we're on the right one? Yes, good. With the existing Transgrid transmission line running through it, and the proposed site access route.

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Next slide please, Kirsty. Regarding the strategic and regional context. So, before I do dive into the assessment issues, it's important to provide some strategic context about the project in relation to its location and access to the electricity network. Noting that all coal-fired power plants in New South Wales are scheduled for closure in the next 15 years, the project would assist in providing large-scale renewable energy generation to meet increased electricity demand.

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The project aligns with national, state and local energy policy which identify the need to diversify the energy generation mix and reduce the carbons emissions intensity of the grid, while also providing energy security and reliability.

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There are additional considerations from a regional context that the project site would benefit from. The site is located within the New England Renewable Energy Zone (or REZ), with direct access to the existing network via Transgrid's 330 kV line that crosses the site. The site is well connected to the road network. Biodiversity and heritage impacts have been minimised through site selection and project design, and residual impacts are minimised through mitigation and offset, as required.

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The site is located in a sparsely populated rural area, with a closest non-associated residence approximately 2.1 kilometres from the site. There would be no significant visual impacts to dwellings, public viewpoints or the surrounding landscape.

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The project would also provide flow-on benefits to the local community, including up to 400 construction jobs and contributions to Council. There would be broader benefits to the state through an injection of approximately \$689 million in capital investment into the New South Wales economy.

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Regarding community engagement and submissions. As you will have noted, the Department exhibited the EIS in July and August 2023 and received 137 unique public submissions, 128 of which were objections. Most objections came from more than

5 kilometres away, and the majority from more than 50 kilometres away. A range of matters were raised in public objections, including traffic, noise, land use, and anti-renewables sentiment.

5 Throughout the assessment process, the Department visited the site and sought advice from 16 government agencies, including Council.

Next slide please, Kirsty. I'm now going to talk about what we found to be the key areas for assessment and the matters identified in the Commission's agenda.

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Next slide, please. Energy transition. So, the project would have a 360-megawatt generating capacity that would power approximately 144,000 homes. The site is located in the New England REZ and would have direct access to the existing electricity network via Transgrid's 330 kV transmission line.

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The project is consistent with the NSW Climate Change Policy Framework of net zero emissions by 2050. The project will play an important role in increasing renewable generation and capacity, firming the grid by including a 150-megawatt/600-megawatt-hour of energy storage, and contributing to the energy transition as coal-fired generators retire.

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The next slide please, Kirsty. Land use compatibility. The majority of the site is utilised for cattle grazing, comprising native pasture, improved pasture, and fodder crops. Recurrent Energy undertook a detailed assessment of the impact of the project on the local and regional agricultural industry in accordance with the Solar Guideline, which concluded that the impacts on agriculture would be temporary and minor in the context of the gross commodity values and land use coverage of the agricultural industries operating within the LGA. The landowner would also be able to continue their agricultural operations within lots surrounding the site throughout the life of the project.

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The project site includes approximately 599 hectares of agricultural land and containing Classes 2, 3, 4 and 6. And the inherent agricultural capability of the land would not be affected by the project due to the relatively low scale of the development, and Recurrent Energy would be required to return the land back to existing levels of agriculture – or agricultural capability – following decommissioning of the project. The proposed development footprint has been designed to avoid LSC Class 1 land altogether and has a minor impact on land in LSC land Class 2.

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Regarding potential cumulative impacts. The project's development footprint combined with the other proposed, approved and/or operational SSD solar farms in the New England Northwest region would be approximately 11,500 hectares. The loss of 11,500 hectares of agricultural land represents a small proportion or 0.018% of the 63 million hectares of land currently used for agriculture in New South Wales.

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Given the nature and scale of the established agricultural industries within the region, the project would result in a negligible reduction in the overall productivity of the region. While the project footprint includes fragmented Class 2 land, it represents a

very small area, is primarily occupied by an existing access track, and is located near watercourses and not suitable for broad-acre cropping.

Accordingly, the Department considers that the project would not fragment or alienate any resource lands in the LGA, and the site would be returned to useable agricultural land following decommissioning.

Inverell Shire Council and DPI Agriculture raised no concerns about long-term agricultural use, and importantly, the loss of agricultural land in the region must be balanced against the broader strategic goals of the government, along with the environmental and economic benefits of renewable energy generation and firming capacity.

The next slide please, Kirsty. Traffic and transport. Excuse me. So, components of the project would be transported from the Port of Newcastle. Heavy vehicles requiring escort movements would be limited to four, associated with the transformer. All vehicles associated with the project would access the site via the intersection of the Gwydir Highway and Spring Mountain Road, then to Sturmans Road and into the site.

The proposed heavy vehicle requiring escort route from the Port of Newcastle travels west along the Golden Highway towards Dubbo, proceeds north along the Newell Highway through Coonabarabran to Moree, east along the Gwydir Highway through Inverell, and south into Spring Mountain Road.

Regarding upgrades. To allow movements of 82-metre-long heavy vehicles along the OSOM route, several road upgrades are required across six LGAs, including upgrades to the intersection of the Gwydir Highway and Spring Mountain Road, and upgrades to Spring Mountain Road and Sturmans Road into the site. These locations are identified in the recommended conditions and each road upgrade has in-principle support from the relevant council.

Next slide please, Kirsty. So, regarding other assessment issues. Biodiversity. So, the project would result in the clearing of approximately 143 hectares of native vegetation, including 142 hectares of BC Act listed Box Gum Woodland, almost all of which is comprised of low-quality derived native grassland. Impacts on native vegetation would be offset through the retirement of 215 ecosystem credits, which would be retired under the Biodiversity Offset Scheme prior to any impact.

Regarding threat and flora and fauna species. Impacts on ecosystem credit species would be offset through the ecosystem credits, and impacts to species credits, species would be offset through 521 species credits, again retired under the Biodiversity Offset Scheme.

Regarding potential serious and irreversible impacts. So, the Box Gum Woodlands critically endangered ecological community is included in the current list of entities at risk of SII under the BC regulation. The majority of Box Gum Woodland proposed to be cleared by the project is low-quality derived native grassland. Given the current geographical extent of Box Gum Woodland in New South Wales, the project would impact 0.0002% of its extent in New South Wales.

5 The Department considers that it would be very difficult to conclude that an impact of approximately 0.0002% is likely to contribute significantly to the extinction of Box Gum Woodland. Additionally, CPHR, being the State Government's biodiversity agency, their review of the revised BDAR have raised no concerns about the project's impact on Box Gum Woodland.

10 The Department's assessment concludes that the impacts of the project on SII entities can be adequately minimised through the required offsets and would not result in serious and irreversible impacts.

15 Regarding water supply and demand. So, the project would require 75 megalitres of water over the 21-month construction period for dust suppression. The project would require 475 kilolitres of water per annum during operation, most of which would be allocated for cleaning of solar panels.

20 To satisfy these requirements, the project proposes to use a Council-owned standpipe to supply approximately 50% of construction water needs, which Inverell Shire Council has agreed to, and the existing on-site bore for the remaining 50% under a miscellaneous works application to change the bore use from domestic stock to commercial. Both Water NSW and NSW DCCEE Water Group have been consulted and are satisfied with this approach.

25 Around waste management. The project would produce a number of waste streams during construction and decommissioning. The operational phase of the project would result in minimal waste. Appropriate waste minimisation and mitigation measures have been identified to mitigate the waste impacts arising from the project. All waste generated would be managed in accordance with the *Protection of the Environment Operations Act 1979* (or the POE Act) and the *Waste Avoidance and Resource Recovery Act 2001*.

30 Inverell Shire Council was consulted for comment during the assessment process, where it was confirmed that the Inverell Waste Depot has limited capacity. And therefore it was requested that a Waste Management Plan be prepared in consultation with Council to ensure waste generated by the project is able to be managed safely.

35 The Department has recommended conditions of consent requiring Recurrent Energy to reduce waste, recycle where possible, and dispose of unrecyclable waste at a licensed facility, and has conditioned the Waste Management Plan. Accordingly, the Department considers that the waste generated by the project would be appropriately managed.

40 Regarding hazards and risks. Bushfire. The project site is identified as bushfire-prone land within the Northern Tablelands Bushfire Management Committee Region. Recurrent Energy prepared a bushfire risk assessment where it committed to mitigating bushfire risk by establishing a 10-metre asset protection zone (or APZ) around critical infrastructure, preparing a Bushfire Management Plan, a fire safety study, and Emergency Response Plan, and ensuring adequate water supply, including static tanks to access points and mobile firefighting resources.

5 The Department consulted with RFS and Fire and Rescue NSW throughout the assessment and in preparing the conditions of consent, who raised no objection to the project, subject to the recommendations identified in the bushfire risk assessment being implemented, which Recurrent Energy has committed to.

10 The Department considers that the fire risks for the project can be managed, subject to the recommended conditions of consent, including the preparation of a fire safety study and Emergency Plan. In the event of an emergency, the main site access is the primary egress point, however, a secondary emergency egress point would be available in the northwest corner of the site via a private access track connecting to the Gwydir Highway.

15 And regarding other hazards. Recurrent Energy prepared a preliminary hazard analysis (or a PHA) which recommended best separation distances. The Department considers that dangerous goods stored on site would unlikely exceed the threshold limits in the Hazardous and Offensive Development Application Guidelines. The project is not potentially hazardous, as per the Resilience and Hazards SEPP, relating to the storage of dangerous goods. And the project meets the qualitative risk criteria outlined in the
20 Hazardous Industry Planning Advisory Paper Number 4, Risk Criteria for Land Use Safety Planning.

25 The Department is satisfied that all avoidable risks have been avoided, and the risks from a major hazard have been reduced by separation to nearby residents and existing high-risk installations.

30 Regarding contamination. Recurrent provided a preliminary hazard investigation (or a PSI) which found potential contamination risks but based on prior land uses such as farm machinery and chemical storage, which are typical of the site setting. The PSI recommended management measures for making the site suitable for the proposed solar farm. The PSI also recommended an expected-finds protocol should contamination be encountered on the site.

35 The Department considers that the proposed use of the land is not intensive and is low risk from a contamination perspective.

40 Regarding social and economic impacts. In addition to its contribution to Australia's renewable energy transition, the project would generate direct and indirect benefits to the local community, including up to 400 construction workers at peak, expenditure on accommodation and business in the local economy by workers who would reside in the locality, and procurement of goods and services by Recurrent and associated contractors.

45 Recurrent has reached an in-principle agreement with Inverell Shire Council to enter into a VPA which is consistent with the amount described in the Department's Benefit Sharing Guideline, including \$850 per megawatt per annum and the timing identified in Council's Renewable Energy Community Benefits Sharing Framework Policy. Accordingly, the Department considers the project would result in positive community benefits.

Regarding workforce accommodation. The project is expected to generate an average of 200 full-time equivalent jobs during peak construction, with an estimated – oh sorry, that’s not during peak – an average of 200, with an estimated 400 workers during peak construction over a period of 14 months.

The Department consulted closely with both councils throughout the assessment process to understand their position on workforce accommodation in the region for this project. Importantly, Recurrent has worked closely with Glen Innes Severn Council on council and private residential projects which would initially be used during construction and would then provide long-term accommodation, which would leave a legacy benefit to the community.

Both Inverell and Glen Innes Severn councils have provided their support for the preparation of an accommodation strategy post approval, subject to the strategy being prepared in consultation with each council prior to the commencement of construction works.

Regarding noise and vibration. Construction noise levels are expected to exceed the noise management level at three receiver locations for a temporary period of two weeks during the Stage 1 access road widening works. Notwithstanding the above, all receiver locations are predicted to comply with EPA’s highly noise affected level of 75 decibels.

Construction vibration impacts are expected to arise from the access road widening works at one non-associated receiver, which is located 50 metres from the closest construction. To mitigate these impacts, Recurrent proposes to offer advanced warning of disruptive works, verification of predicted noise and vibration levels, and respite periods where works are carried out in blocks.

Recurrent’s assessment identified there would be no noise or vibrational exceedances at any receiver locations during operation or decommissioning.

Road traffic noise during construction and operation along the Gwydir Highway, Spring Mountain Road and Sturmans Road would comply with the relevant criteria in the EPA’s Road Noise Policy. The Department considers that noise generated during construction, operation and decommissioning of the project can be appropriately managed through implementation of the proposed mitigation measures and adherence to the recommended conditions of consent.

Regarding construction impacts and dust. The primary source of dust from the project would occur due to earthworks or excavation and vehicle movements on unsealed roads. These works have the potential to adversely impact on local air quality, particularly for the receivers located close to these works. Recurrent has committed to a series of dust suppression matters during construction, including water cart usage, road sealing and pavement stabilisation.

The Department considers that dust generated during construction of the project would be appropriately managed through implementation of the proposed mitigation measures and adherence to the recommended conditions of consent.

Regarding subdivision. The proposed subdivision would result in the creation of two new lots that would comprise areas below the minimum lot size of 200 hectares and would be prohibited under the Inverell LEP. Notwithstanding this, the EP&A Act allows development consent to be granted for SSD applications where the development is partially prohibited.

The Department is satisfied that the proposed subdivision does not conflict with the objectives of the Inverell LEP because it would not impact sustainable primary industry production from occurring on surrounding allotments, would not cause the fragmentation or alienation of resource lands, and would not impact the agricultural value of surrounding rural land.

The Department also notes that Inverell Shire Council did not raise concern with the subdivision. The subdivision would enable ownership of select parcels to be transferred to the agreed party to facilitate project delivery and future proof the ownership of electricity infrastructure for the approved solar farm. The subdivision would not result in any additional dwelling entitlements. And the subdivision is consistent with the objectives of the RU1 zone as it would encourage diversity in primary industry enterprises and systems appropriate for the area.

And the Department has fully considered the impacts of the project and considers it can be approved regarding the subdivision.

Next slide please, Kirsty. I believe. Just to run through some other matters on the agenda. So, connection to the existing transmission infrastructure, I'm happy to of course take questions or discuss afterwards. There is an existing Transgrid overhead transmission line that runs through the site. The proposed location of the BESS and 330 kV substation will allow direct connection into the grid.

Regarding New England REZ and cumulative impacts. The project is located in the REZ and it would contribute to the continued growth of renewable energy generation and storage capacity in the REZ, with direct access to the existing network.

There are five state significant renewable energy projects within 50 kilometres of the site. Potential cumulative impacts have been identified with nearby projects, including White Rock Wind Farm Stages 1 and 2, White Rock Solar Farm, Sapphire Wind Farm, Sapphire Solar Farm, and Glen Innes Wind Farm.

An assessment has been completed with reference to Cumulative Impact Assessment Guidelines for State Significant Projects. Recurrent has considered the potential cumulative impacts with other nearby renewable projects relevant at the time of the EIS submission.

So, just to touch on agriculture, biodiversity, traffic and accommodation regarding cumulative. So, as previously mentioned, the project's footprint combined with the

other proposed, approved and operational SSD solar farms in the New England Northwest Region is about 11,500 hectares. That's 0.018% of the 63 million hectares used for agriculture in New South Wales, a negligible reduction in regional productivity.

Whilst the project would occupy land currently used for agricultural purposes, its agricultural production value is approximately 0.14% of Inverell LGA's annual production value. Therefore, the cumulative agricultural impacts are minimal, temporary and reversible, with the potential for dual land use and full rehabilitation after decommissioning.

Regarding biodiversity. The project would clear about 142 hectares of Box Gum Woodland, most of which is low-quality derived native grassland. The current geographical extent of Box Gum Woodland in New South Wales – I don't need to repeat this, I think you've heard that. And the cumulative biodiversity impacts are limited and would be offset in accordance with the Biodiversity Offset Scheme.

Traffic. Recurrent has considered the cumulative traffic impacts associated with other renewable projects along the state road network, including the Gwydir Highway. The traffic impact assessment concluded that following upgrades at key intersections, the network has sufficient capacity for the cumulative construction traffic, and Transport for NSW supported this conclusion.

Regarding accommodation. Recurrent considered the cumulative impacts of the project with regard to workers accommodation, noting construction staff would require short-term accommodation in both Inverell and Glen Innes. Recurrent has consulted with both councils regarding existing accommodation supply, availability and challenges.

The Department has recommended a condition of consent which requires Recurrent to prepare an Accommodation and Employment Strategy in consultation with both councils, and notes other discussions between Recurrent and the councils regarding legacy benefits.

Regarding conditions. The recommended conditions have been prepared in consultation with Council and the relevant government agencies and are appropriate for the nature and scale of the project. The Planning Secretary's discretion is available for minor matters in selected conditions that don't warrant the modification to be assessed in consultation with the relevant stakeholders.

Next slide, please, and just the final slide, I believe. Just on evaluation or summary. Electricity generating works are permissible with consent on the site under the Transport and Infrastructure SEPP. The project would not significantly reduce the region's agricultural productivity, and the site can return to agricultural use after decommissioning.

There would be no significant visual, glint or glare impacts on surrounding residences or road users. The site is located in the New England REZ and the project supports the transition from coal and gas to low emissions generation consistent with NSW's Climate Change Policy Framework and Net Zero Plan. At 360 megawatts, it would

power about 144,000 homes, and 850 megawatts/600-megawatt-hour battery for dispatch during low generation.

5 It strikes an appropriate balance between efficient use of the solar resource and impacts on surrounding land users and the environment, and would deliver jobs, investment and community benefits through the VPA with Council.

10 On balance, the Department considers the project is in the public interest and is approvable subject to the recommended conditions. Thank you and happy to take questions.

15 **MS DINNING:** Thank you very much and thank you to the Department for the Assessment Report and the work done to date. So, we have a few questions and they're not in any order of priority here. But if I could take you back to the workforce accommodations, and I'm looking at the Assessment Report page 44, I don't expect you to go and find it.

20 So, we've heard this morning from the councils that they note that an Accommodation and Employment Strategy will be worked out with them, with the Proponent. But we've also heard concerns about the displacement of the people in social situations, because there are limited rooms in these places, and some of these motel rooms are being used currently by some of the social services for homeless people, people in crisis/in need.

25 There's also – we are a little bit confused and we'll just elaborate on this a bit further, because we understand from what you've provided to us and that there has been discussions about using some Council land or Council – I don't know if it's land or buildings, maybe you can help us here with that. So, it says, "The Department has consulted closely with both councils through the assessment process to understand their positions." So, you know what they're talking about.

30 But then it says, "Recurrent Energy has worked with Glen Innes on private residential projects which would initially be used during construction, would then provide long-term accommodation which would leave a legacy benefit to the community." And we haven't quite heard that. What we've heard is that the tier 1 contractors have said there's enough accommodation and that the current accommodation is fine.

35 So, maybe these are not contradictory, but can you clarify for us your understanding of what the councils will be negotiating with the Applicant, or if there are any issues there? We understand there's a draft condition, which we appreciate.

40 **MR DAVIES:** Sorry, I was on mute and I lost the screen. Thank you, and a great question, and this one is probably the key – one of the key assessment matters that the Department considered, noting that many solar farms are required to have an accommodation camp on site now. And hence why we consulted closely with councils to check that both were comfortable with a different approach on this project, so no accommodation camp on site, which we often require on many solar farms and wind farms now. And to check that they were comfortable with the assessment undertaken,

and that the Accommodation and Employment Strategy post approval satisfied their needs.

We are working now, we do have that conditioned, as you referred to, and it's interesting hearing your comment on perhaps social housing, or for want of a better term or use of accommodation for certain groups in the community, and that's a really important matter and one that could potentially be strengthened in the Accommodation and Employment Strategy.

We have worked with other councils on other projects, particularly on BESS projects where there simply isn't room for an accommodation camp, but still have a fairly high workforce to house, to actually make that Accommodation and Employment Strategy or the requirements around it more unique to the area. So, there are other projects in other LGAs that are going through the system at the moment, where we are tweaking the conditions based on council's comments.

So, that's the initial comment, is that perhaps there is something there that – not that I think that there can be a prohibition, but perhaps some condition around ensuring that certain members of the community or groups in the community are protected – which is a really important matter in the rollout of – or the rapid rollout of renewables in regional New South Wales.

Now, going to the second question on Recurrent's discussions with, I think, in particular Glen Innes Council regarding legacy benefits. We don't have absolute detail on that, I'm happy to be corrected by others on the line. But our understanding was that, and our assessment, to be clear, hasn't relied on that, it's certainly noted by the Department.

But just to be clear, our assessment is based on Council's comments on the availability of accommodation, and my understanding is there's been no objection to the approach taken here. But as a, I suppose, a benefit is that Recurrent's discussions with Glen Innes Council in particular on legacy benefits, whether that's use of existing council accommodation or working with other private suppliers in consultation with Recurrent. So, more than happy to hear more on that from Recurrent or Council.

But I suppose it's, to be clear, the Department's assessment is what is proposed and that the additional legacy benefits is noted by the Department in its assessment but not reliant on it.

MS DINNING: Thank you. I think it is something we'll discuss a bit further because we heard this morning from the councils, and I'll go to the next comment in a minute, but they're linked. It is about this not knowing what's involved; they know the approximate numbers of workers – it's the timing, there are festivals and events, there's tourism, but it was very much about that social displacement as well. Because obviously, the market will make the rooms available to the highest bidders, which is understandable. But I appreciate your comments and we will continue that discussion around how we might include some of those considerations in the condition.

And you've touched on – thank you for that – also the cumulative impact for a number of areas, and the councils were quite clear in the fact that they haven't been able to get a lot of information from the Applicant in order to progress some of the matters. So, it's a catch 22, isn't it, until there's approval, they're not having the discussion. But one of the questions is about the cumulative impacts on matters like accommodation in the whole Renewable Energy Zone and the timing of projects and when they're rolling out.

So, it's quite difficult, I think, for councils to respond completely to one project, I suppose, when there are many, many other factors at play in there. Do you consider that in your assessments?

MR DAVIES: We do consider that in our assessments, and I agree with all the points that you've raised there, and councils' concerns or challenges in assessing or understanding the timeframes of each project within Renewable Energy Zones, and it's one that the NSW Government has undertaken detailed studies on.

It is challenging for the Department of Planning in considering the rollout of renewables and hence why many projects have now accommodation camps on site, in light of there being ultimately no overarching approach – whether that's public or privately led, for an accommodation solution or accommodation solutions, more broadly, across Renewable Energy Zones for multiple projects.

So, the Department's role, we fully appreciate, or as best as we can, appreciate the challenges and it's a key assessment matter on every one of our renewable and storage projects now. And sequencing is key, as is availability of accommodation immediately but also as projects ramp up and down. And it's one we are dealing with not only on an individual basis but, yes, we are considering all cumulative impacts, including accommodation, in each of our assessments. And hopefully that's reflected in our Assessment Report and our comments today.

MS DINNING: Thank you. A last question on accommodation just before I pass it to Commissioner Michael Wright. But the reason why there's no accommodation camp proposed, is that the Applicant chose not to do it at the time when they put in their proposal?

MR DAVIES: Yes, the Applicant chose not to do it and that has been the approach by many applicants until ... I think, I'll speak quite openly, I think the first project was the Birriwa Solar Farm in the Central West where the applicant submitted, as all applicants had been, submitted an EIS without an accommodation camp. But throughout the assessment process and in the Department's assessment of the EIS and in discussions with host council or host councils, it came to light that there was not sufficient accommodation in that area, in the Central West Orana and in particular in that area. And we required an accommodation camp.

We did the same with Tallawang Solar Farm where I don't think one was initially proposed but the Department required it. And perhaps one other, and have been advising applicants from the very beginning of the process that accommodation is critical to all renewables projects, whether that's a solution such as an accommodation

camp or one in identifying the initial approach is to identify sufficient accommodation locally without the need for an accommodation camp.

5 So, in our assessment, it really was a key assessment matter for us and one we
discussed in depth within the Department more broadly, was accommodation and the
lack of a camp on this project. And in our discussions with councils, so first of all, on
the evidence put forward by the Applicant on accommodation availability,
demonstrating availability, but also in discussions with council and understanding both
10 councils were comfortable with no accommodation camp for this project. And the
requirements of the Accommodation and Employment Strategy in consultation with
both councils, that both councils supported that approach for this project. So, that's
why we have proceeded on this basis.

15 **MS DINNING:** Thank you very much for that clarification, that's very helpful.
Thanks, Iwan.

20 **MR WRIGHT:** Thanks, Sarah. Just going back to the whole question about
cumulative impacts, and I think I know the answer to this question because I think the
office here has asked the same question. But our understanding was that EnergyCo was
developing REZ cumulative impact assessments for various REZ's, and possibly also
New England, but it appears that's not the case. Is that correct?

25 **MR DAVIES:** That's correct. The release went back and forth quite a lot and I
couldn't confirm during this recording which have been released and which haven't
been, and which are in the public domain. So, I perhaps ... I can't answer that question
directly based on multiple studies, including in each of the Renewable Energy Zones.
Is that ...

30 **MR WRIGHT:** It'd be fair to say, Iwan, that the Department hasn't been able to avail
itself of cumulative impact assessment work done by EnergyCo to inform this
assessment – is that correct?

MR DAVIES: That's correct. I'll advise if otherwise, but that is correct.

35 **MR WRIGHT:** Okay. Thank you. The agri-solar activity proposed. We asked the
question of the Applicant earlier today as to whether that was an optional activity or
something that they were committed to doing or required to doing. Their response was
that in fact it was a mitigation measure, maybe to manage weeds – I'm not actually
sure why. Can you explain to us, I mean, I think, you know, the Panel believe that agri-
40 solar is a beneficial outcome. Is it being proposed to offset the reduction in agricultural
activity primarily, or is it a requirement to mitigate an impact caused by the proposal?
Or both?

45 **MS DINNING:** Or neither?

MR WRIGHT: Or neither!

MR DAVIES: So, first of all, the Department fully supports grazing alongside solar
farms where feasible and certainly sees the benefit. However, to be clear, the

Department has assessed the land use of an electricity generation works, being a solar farm and a battery alone. We have not considered ... So, our recommendation is based on the use of a solar farm. Sheep grazing or other type of agriculture on site would be a benefit, but our referral to the IPC is based on the use of that entire development footprint solely for the purposes of an electricity-generating works.

It would be a benefit in terms of perhaps ground maintenance and of course agricultural output, and it is noted in our report, and I don't have the words in front of me now. But to be clear, we've assessed an electricity-generating works here, our decision has not been influenced on whether continued agricultural use is committed to or not. And we see that use as beneficial, but we are not, I suppose, approving or monitoring agricultural output from the development footprint.

MR WRIGHT: I understand that. I suppose the – sorry, Sarah.

MS DINNING: Yes, I was going to – there's actually condition B16, requires the Applicant to maintain agricultural capability.

MR DAVIES: Is that where feasible?

MS DINNING: No.

MR GEOFF KWOK: It says, "where practicable".

MR DAVIES: Where practicable. Yes, so we see it as a benefit. Perhaps I haven't summarised this appropriately. So, in the rollout of renewables in New South Wales, the Department is seeking a just transition. We note the existing use of the land; however, we do not consider the proposed use would have a significant negative impact on the current – on the broader agricultural output of the region.

We look to condition matters where it may be beneficial and we consider that grazing alongside solar farms is beneficial, and hence why we have that condition, but – and apologies if I've forgotten the term at the end – but where relevant or where possible or – I forget the term.

MR WRIGHT: Yes, yes. Iwan, I was thinking in terms of, okay, so I understand the Department's position is it not considering, you know, mitigating impact on loss of agricultural land as a determinative factor. I was more interested than in whether the grazing under the panels was an actual operational requirement to mitigate impact of the proposal. So, instead of being required to mow the pasture, it's being grazed instead, so that activity, irrespective of whether it's an agricultural activity or not, is a mitigative requirement. That's what I'm curious to know. Does that make sense?

MR DAVIES: It does make sense. It's not – and I'm happy to be corrected, and again ... When I opened the conditions earlier, they were in this funny format so I don't have the conditions open in front of me. But we cannot – and happy to be corrected – we cannot condition that as an exact mitigation measure because there are requirements that land needs to be managed appropriate by whatever the appropriate

means are, whether that's mowing or grazing. We simply require the outcome. So, we are very ...

MR WRIGHT: I understand, okay.

MR DAVIES: ... concerned about ...

MR WRIGHT: I understand, Iwan.

MR DAVIES: Good, thank you.

MR DINNING: You can go ... We're just taking turns. We know that Glen Innes Severn Council doesn't have a VPA, it is with Inverell Council. Just out of interest because quite a few of the impacts will be with the other council, not to do with this matter so much, it's what the policy with the sharing of VPA agreements between councils so close to each other? I mean, the project's equidistant, really.

MR DAVIES: So, perhaps I'll pass to my colleagues, no problem if you don't have the exact detail for this project, but just to set out more broadly before perhaps Andrew or Kirsty provide a response. The policy is set out, or the NSW Department of Planning's requirements are set out in the Benefit Sharing Guideline, which was released last year, I believe. And that sets out multiple scenarios, I can talk through those off the top of my head now, but the requirements are set out there. Andrew or Kirsty, is there anything in particular that we should note on this project?

MR MCINTYRE: Sure, yes, so Andrew McIntyre for the Department. As you've said, the VPA, there is a VPA with Inverell Council as the host council. The application has been with the Department, well, been with the Applicant but it was lodged some time ago before the Benefit Sharing Guideline were made.

During the assessment, we discussed with the – Glen Innes Severn Council raised the issue of the VPA and we referred that to the Applicant as well to discuss with them. And those discussions, we were advised by the Council, were that the Applicant at this time didn't think they had time to develop a VPA with the Council but had committed to discussing initiatives and areas within their community that they would be able to contribute to in lieu of a VPA. And the Council had agreed to that.

MS DINNING: Thank you. Thank you for that.

MR WRIGHT: Secretary's discretion – and we certainly understand why that discretion is often inserted into consent. In our discussions with Inverell Council this morning, there was a concern raised in particular around the insertion of the Secretary's discretion at draft condition B3 which relates to the route for the over-size/over-mass or heavy vehicle transport corridors. And they were quite insistent that they should have, they should be involved in any decision to alter that route, should the Secretary choose to utilise her discretion there. I'm just interested to know how important that discretion is for that particular condition, given Inverell Council's commentary today.

MR DAVIES: No, great question, and one we've considered, as the IPC is aware, considered in real detail regarding the use of Secretary's discretion. It's an important if not critical, or an important condition to have the Secretary's discretion in. So, with the challenges of the energy transition rollout in New South Wales, developers are – there are challenges around use of which port, port capacities, but also benefits of others undertaking road upgrades, such as government authorities or other developers.

And the Department is seeking to ensure that this is least amount of impact as possible on communities along routes. And if the developer identifies a more appropriate route, that is supported by the host councils along that route, and importantly, there would be no road upgrades required as part of that route. Then it is a more reasonable and feasible and logical approach to the build-out of renewables projects, including this one.

So, the Department does receive requests for Secretary's discretion on this condition and works with – immediately consults with the relevant roads authorities, in fact we require the Applicant to undertake that consultation before submitting a request to us, to ensure that the roads authorities support the request. So, absolutely it's the first point of call is the relevant roads authorities along any different route that would be proposed.

MR WRIGHT: Okay, I understand, thank you. Just one quick question. The SII impact on Box Gum Woodland and, you know, in the IPC we're dealing with the impacts on Box Gum Woodland with almost every project we deal with, certainly in the renewable energy space. And I know it's kind of like – it's again going back to that cumulative impact question – agree with this project, it's a minor insignificant impact.

I suppose a larger question is about the cumulative set of impacts and how that translates to at a state level in terms of SII. Not a question that I expect you to know an answer, but if you've got an answer, I'd love to hear it.

MR DAVIES: Yes, no, I think it's – look, I think there have been many or some recent studies that have identified the extent of Box Gum Woodland across New South Wales, and we appreciate that Box Gum Woodland is on the list of potential SII species. But we do certainly note the extent and the miniscule percentage of that entity that these projects in their entirety would impact in New South Wales, particularly when that entity or the condition of that entity is not in woodland or wooded state, and the majority of what is being impacted, not only on this project but on others, and appreciate there are trees being impacted, but the majority is derived native grassland, which is currently being used for agricultural grazing purposes and of low quality as well. I suppose that's the Department's response to the SII matters on Box Gum Woodland.

MR WRIGHT: Thank you for that.

MS DINNING: Thank you.

MS ANDERSON: Nothing from me, thank you.

MR KWOK: Or me too, thanks.

MS DINNING: Thank you, Iwan and Kirsty and Andrew. Do you have any final comments before we finish?

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MR DAVIES: I don't have any. Just I really thank the IPC for their time today and happy working with you as you continue with your assessments. Thank you very much for your time.

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MS DINNING: Thank you. We're heading off for the site visit tomorrow and then there were no registrations for the public meeting, so we won't be having a public meeting. Thank you very much.

MR WRIGHT: Thanks a lot.

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MR DAVIES: Thank you.

MS VOGEL: Thank you.

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MR DAVIES: Bye.

THE MEETING CONCLUDED