

Date: 11 November 2016

Our reference: 8477

Nick Canto
Principal Consultant
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Email: nick.canto@icubed.com.au

Dear Nick,

**Re: Response to Request for Further Information on the Development Application for Yarranlea Solar Farm
(MCUI/2016/3225 & RAL/2016/3227)**

Ecology and Heritage Partners Pty Ltd have been engaged by icubed consulting Pty Ltd on behalf of Yarranlea Solar Pty Ltd to prepare a response to a relevant queries posed in a Request for Further Information (RFI) by Toowoomba Regional Council (TRC) regarding the development application for the Yarranlea Solar project. In preparing this response, Ecology and Heritage Partners have drawn on the following reports:

- Ecology and Heritage Partners. 2016a. Ecological Assessment of the Proposed Yarranlea Solar Project, Yarranlea, Queensland. Version: Final 2 (August 2016). A report prepared for Yarranlea Solar Pty Ltd.
- Ecology and Heritage Partners. 2016b. Construction and operation of a renewable energy facility (solar farm), Yarranlea, Queensland. A referral submitted to the Commonwealth Department of Environment and Energy. A report prepared for Yarranlea Solar Pty Ltd.
- Department of Environment and Heritage Protection. 2016. Clearing Permit for Belson's Panic.

TRC has requested information regarding fencing designs to enable fauna movement through the solar farm and proposed landscaping along sections of the proposed development.

Fences

The plans submitted as a part of the information response show fences located between the landscaping and the road, or along the property boundary. This means the fences will be visually dominant rather than the landscaping. This does not result in a visually suitable arrangement, especially as the fences proposed are chain mesh fences with barbed wire on top. This results in an industrial appearance to the development, especially along Murlaggan Road where the fencing is located on both sides of the road reserve. This outcome is unlikely to be supported.

It is noted that the chain mesh fencing may provide the greatest amount of security to the site, but minimizes opportunities for fauna movements through the site, and has the potential to collect large amounts of debris during rain events.

3.2 *Please provide additional information regarding the potential for alternative fence designs that enable fauna movement through the site.*

Response

The Ecological Assessment report, completed by Ecology and Heritage Partners (2016a), found that the study area is unlikely to provide suitable habitat for a diversity of reptile species due to the agricultural land use and lack of fallen woody debris. Reptile diversity is likely to be limited to common skinks and snakes, particularly Eastern Brown Snakes *Pseudonaja textilis*, which frequent cropping lands. The threatened Condamine Earless Dragon *Tympanocryptis condaminensis* is a potential occurrence due to its propensity to occur within cropping lands. The study area is also unlikely to provide habitat for a diversity of native mammal species due to the absence of vegetation cover although ubiquitous species such as Echidna *Tachyglossus aculeatus* may occur as they utilise a range of intact and disturbed habitats throughout Queensland (Appendix D).

A chain link fence has the potential to exclude larger terrestrial species such as Echidna from the solar farm. Thus the lower section of the wire fence has been amended so that only a vertical electricity shock line aligns with a 20 centimeter gap. This is sufficient to allow reptiles and Echidna to enter and leave the site without impediment.

Vegetation

Additional detail will be required to clarify and detail the length of time for the landscaping to be established as a part of the screening associated with the development. If the application is to be approved, Council would not wish to condition the planting of advanced vegetation such as 2m tall tress, however Council would also not want the landscaping to take years to establish.

While the applicant has proposed a pasture mix and potential grazing over the site, it is recognized that weeds are potentially able to grow up on site. The applicant has referenced the presence of a number of weeds in the road reserves and within the existing stand of vegetation on site, potentially due to a lack of maintenance in those areas.

It is noted a submitter made reference to koalas in the vicinity of the site and this should be addressed as a part of the response to the Outstanding Issues.

4.1 *Please provide a Flora and Fauna Management Plan for the site.*

Response

As stated in the Ecological Assessment report (Ecology and Heritage Partners 2016a), several threatened fauna species have the potential to occur within the site, namely Condamine Earless Dragon, Five-clawed Worm-skink, Painted Honeyeater and Grey-headed Flying-fox. However, the habitat occurring within the site (the small patch of vegetation in the southern portion) was considered to be sub-optimal for Five-clawed Worm-skin, Painted Honeyeater and Grey-headed Flying-fox and the loss of the vegetation was not considered to be significant. In addition, potential habitat along Yarranlea – Murlaggan Road for Condamine Earless Dragon and Five-clawed Worm-skink will not be impacted by the proposed solar farm.

At the time of writing the Ecological Assessment report, database searches did not show any Koala records from the Watson Road or Yarranlea Road area. The Ecological Assessment Report noted that food trees are present within the study area (primarily along road reserves), however inspection of trees did not reveal the presence of scratches or scats characteristic of usage by Koalas. Based on this, the significant species assessment (Table 10 in the EAR) considered that Koalas had a 'low' likelihood of occurrence within the study area. The definition of low likelihood includes:

- a) The species is likely to visit the study area occasionally or opportunistically whilst en route to more suitable sites; and/or,
- b) There are only limited or historical records of the species in the local area (i.e. more than 20 years old); and/or,
- c) The study area contains few or no characteristics of the species' preferred habitat.

Although it is acknowledged that Koalas occur in the region (based on records supplied by submitters and existing database records) the assessment of Koala usage within the study area does not change. This assessment is based on the data that was available at the time of preparation and the limited habitat value of the study area for the species. Further searches of the Atlas of Living Australia on 28 September, 2016, do not show any records of Koala from the study area or immediate surrounds. The closest records are from Tummalville Road (2010), approximately 5 kilometres south of the study area and on Irongate Road (2010) approximately 5 kilometres north-east. Regardless, the proposed impact on Koala trees from the solar farm is minimal and habitat trees within the study area (along Yarranlea – Murlaggan Road) will not be impacted.

The population of the threatened Belson's Panic within the small patch of vegetation has been approved for removal by the State Government and assessed as not a significant action under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*. Consequently, a Flora Management Plan is not required to be prepared to manage the removal of Belson's Panic or this vegetation is general. An Impact Management Plan for removal of Belson's Panic has been approved by the Department of Environment and Heritage Protection as part of the Clearing Permit approval. Refer to Appendix G.

In conclusion, a Flora and Fauna Management Plan is not required to manage potential impacts to threatened species habitats within the study area. However, measures should be included in the Construction Environmental Management Plan (CEMP) for the solar farm to prevent impacts to external habitat (grassland and mature trees) along Yarranlea – Murlaggan Road. A CEMP can be conditioned for completion as part of an Operational Works Approval.



Thank you for opportunity to respond to the concerns raised by TRC for this project. Should you have any remaining queries or concerns, please don't hesitate to contact me on mobile: 0419 715 351 or email: dfleming@ehpartners.com.au.

Kind regards

A handwritten signature in black ink, appearing to read "Dave Fleming".

Dave Fleming

Principal Ecologist

Ecology and Heritage Partners Pty Ltd