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Our ref: 1012

Department of Water and Environmental Regulation
Locked Bag 33
Cloisters Square
PERTH WA 6850

Department of Water and Environmental Regulation	
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Div/Officer	
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Dear Sir/Madam

Clearing Permit Application
Lot 194 Robartson Road and Lot 19444 Bruce Rock-Merredin Road, Merredin

Land Insights act for Merredin Solar Farm Nominee Pty Ltd (MSFN) and lodge this application on their behalf. The application seeks a Clearing Permit for Lot 194 Robartson Road and Lot 19444 Bruce Rock-Merredin Road, Merredin ('the site').

The clearing permit is being applied for to clear up to 4.32 hectares (ha) of native vegetation to facilitate the development of a solar farm on the site. The development of the solar farm has been approved by the Mid-West Wheatbelt (Central) JDAP.

Please find enclosed the following:

- Attachment 1 – Application form
- Attachment 2 – Plans
- Attachment 3 – Certificate of Title
- Attachment 4 – Photos
- Attachment 5 – Planning Approval
- Attachment 6 – Flora and Vegetation Assessment.

It is understood that the Department is required to assess clearing permit applications against ten (10) principles contained in Schedule 5 of the *Environmental Protection Act 1986*. The below information has been provided in accordance with these principles to assist with the assessment of the application. Also included is a description of the vegetation on site, the historic and current use of the property, the reasons for clearing and Merredin Solar Farm Nominee's environmental objectives for the site.

Site Description

Location and Land Use

Lot 194 Robartson Road and Lot 19444 Bruce Rock-Merredin Road, Merredin are owned by Bruce Anthony Smith. The signed application form is included at Attachment 1, including a letter of authority from the landowner giving permission to MSFN to clear native vegetation on the site.

The site is located approximately 5 kilometres south-west of Merredin. The combined area is 532 hectares (Lot 194 is 294.2 hectares and Lot 19444 is 237.77 hectares). It is currently used as a rural farming property, predominantly for cropping and occasional grazing. Two

easements cross through Lot 194 and one easement crosses through Lot 19444. These are for Western Power 220kV overhead powerlines which exist on the site.

It is surrounded predominantly by other agricultural properties, with the Merredin Nature Reserve abutting a portion of the northern boundary. The adjoining properties to the north-west which include a diesel power station (Lot 193 on P72480 owned by Merredin Energy Pty Ltd) and Merredin Terminal (Lot 4 on D67823 owned by Electricity Networks Corporation).

Solar panels will be established across a majority of Lot 194 and the northern half of Lot 19444. The construction compound and battery storage will be located at the north-west corner of Lot 194, adjoining the Merredin diesel power station (Lot 193). The photo voltaic (PV) modules will be placed in rows across Lots 194 and 19444.

The proposed development will disturb an area of native vegetation on Lot 194, along with some scattered trees in the paddock areas. An additional area of native vegetation has been identified for clearing on Lot 19444. The design has retained two large areas of native vegetation and rocky outcrops on Lot 194 and a majority of native vegetation on Lot 19444.

Plans of the site are located at Attachment 2 and a copy of the Certificates of Title is at Attachment 3.

Planning

Planning Approval for the solar farm has recently been obtained from the Mid-West/Wheatbelt Joint Development Assessment Panel (JDAP) and the Shire of Merredin (Attachment 5).

The site is zoned *General Farming* in the Shire of Merredin Town Planning Scheme No. 6 and is located within the General Agriculture Zone in the Shire of Merredin Local Planning Strategy.

The Proposed Development

Merredin Solar Farm Nominee Pty Ltd proposes the establishment of a 100MW (DSOC - Declared sent out capacity) solar farm across Lots 194 Robartson Road and adjoining Lot 19444 Bruce Rock – Merredin Road, Merredin (the site), approximately 5 kilometres south-west of Merredin, WA. The proposed solar farm will comprise approximately 400,000 tracking solar panels and associated infrastructure including:

- Photo Voltaic Modules
- Piles and Framework
- Inverters (and associated housings)
- Transformers (and associated housings)
- Substations (including circuit breakers and metering)
- Underground cabling
- Overhead wires
- Perimeter Fence
- CCTV (at entrance and adjacent to substations)
- Battery Storage
- Spares Storage building
- Maintenance compound.

Clearing of vegetation is required to reduce the shading on panels. The solar farm uses a tracking system to follow the sun and to capture the irradiation from sunrise to sunset. Therefore any vegetation will shade panels and reduce their efficiency. As panels are in strings approximately 50 metres long, shading of any panels along the string cuts all generation in the string. Therefore any vegetation of height has a major impact on the viability of the solar farm.

It is expected that clearing will commence in early 2018.

Soils and vegetation

The site is predominantly cleared of remnant vegetation and has been used for farming activities for many years. A few small patches of vegetation remain throughout the site, including granite outcrops through the central portion of the site.

The project area is situated in the Avon Wheatbelt (AW1) which is an area of active drainage dissecting a Tertiary plateau in the Yilgarn Craton. The Yilgarn Block is bounded by the Darling Fault to the west and by the greenstone belts of the Southern Cross and Murchison districts to the east. The Avon Wheatbelt has a gently undulating landscape of low relief, with Proteaceous scrub heaths, rich in endemics, on residual lateritic uplands and derived sandplains with mixed Eucalypt, *Allocasuarina huegeliana* and Jam-York Gum woodlands. There is no connected drainage and across the broader area salt lake chains occur as remnants of ancient drainage systems which only function in very wet years. Lateritic uplands are dominated by yellow sandplain. The Wheatbelt landscape creates a mosaic of plant habitats that include open woodlands, gravelly or sandy heaths, extensive salt lakes and the specialised habitats associated with granite outcrops.

Soil-landscape units, soil types and soil qualities are mapped by the Department of Primary Industries and Regional Development (previously Department of Agriculture and Food). The soil-landscape unit across the site is identified as 258Ta – Tandegin System which is described as sandplain dominated interfluves with weakly indurated lateritised crests and upper slopes and long colluvial yellow sandplain upper to lower slopes. Unlateritised surfaces dominated by sodic and alkaline duplex soils.

Two soil-landscape sub-systems are identified across the site:

- Booraan subsystem (258 TaBR) – Hillslopes predominantly containing hardsetting, grey to brownish sandy loam over clay soils
- Ulva subsystem (258 TaUL) – Yellow sandplain and gravel plain of the Eastern wheatbelt. This unit contains small areas of pale sand.

The Pre-European vegetation across the subject site is described as a mixture 'Eucalypt shrubland – *E. eremophila*, *E. redunca*, *E. spp.*' and 'wattle, casuarina and teatree acacia-*allocasuarina*-*melaleuca* alliance'.

Vegetation in Western Australia has been described on a broad scale in a series of publications by Beard (eg Beard 1972, 1981, 1990) which divides the State into botanical provinces, districts, subdistricts and systems. The survey area lies in the Avon Botanical District, in the eastern central Wheatbelt Region of the Southwest Botanical Province as described by Beard (1981, 1990), in the 'Muntadgin Vegetation System' (Beard 1972).

The Avon Botanical System comprises of Scrub Heath on sandplain, Acacia-Casuarina thickets on ironstone, Woodlands of York Gum (*Eucalyptus loxophlebea*), Salmon Gum (*E. salomonphloia*) and Wandoo (*E. wandoo*) on loams and halophytes on saline soils (Beard 1981).

The Muntadgin Vegetation System (Beard 1972) occurs on relatively high lying country with large areas of residual sandplain forming part of an old plateau surface, dissected by shallow valleys draining to the West and North West. The vegetation of the sandplains consists of dense thickets of shrubs rarely exceeding 2.5 metres in height. There are many granite outcrops. The valleys contain red brown sandy loams overlaying clay which carry Mallee vegetation. If the clay is close to the surface the Mallee changes to Woodland.

Flora and Fauna

A spring botanical flora and vegetation survey was undertaken in September 2017 by Del Botanics. A copy of the report is included at Attachment 7. The survey report provides:

- Threatened Flora (T) and Threatened Ecological Communities (TEC's) Department of Biodiversity, Conservation and Attractions (DBCA) and Department of the Environment and Energy (DoEE) Database search to determine results for the site;
- A spring botanical survey; and
- An assessment of vegetation types and conditions.

The survey identified a number of flora species and four vegetation types were recorded at a local level. No species of Threatened (T), Priority Flora or Threatened Ecological Communities (TEC's) pursuant to The Biodiversity Conservation Act 2016 were located .. The botanical survey was undertaken in spring to coincide with the flowering times of the threatened species.

A total of 59 taxa, comprising of 20 families and 50 genera were recorded on site. Species representation was greatest among the Poaceae, Myrtaceae and Asteraceae families. Eleven introduced flora species were recorded on the site. Species representation was greatest among the, Poaceae and Asteraceae, families. This represents 19% of the total number of flora species recorded on site.

No EPBC listed species or TEC's were recorded during the survey. There is one known Threatened Ecological Community (TEC) listed under the EPBC Act which was identified in the EPBC Protected Matters search within a 10 kilometre radius of the site. The TEC is listed as 'Eucalypt Woodlands of the Western Australian Wheatbelt'. Although the flora survey identified some Eucalypt woodland in 'good' condition within the project area, there were no areas that measured greater than 2 hectares with an intact understorey. Therefore, the woodland does not meet the requirements as outlined in the guide 'Eucalypt Woodlands of the Western

Australian Wheatbelt: a nationally protected ecological community' (Commonwealth of Australia, 2016). Most areas were dominated by Woodlands dominated by mallee trees, non-eucalypt woodlands, e.g. with jam, Sheoak, Banksia, isolated paddock trees and very small remnants and patches that are degraded. These areas are not recognised as being a representation of the Eucalypt Woodlands of the Western Australian Wheatbelt TEC. Therefore, the information provided suggests that the TEC Eucalypt Woodlands of the Western Australian Wheatbelt is not present within the project area.

The vegetation structure on site was determined using the definitions in 'Bush Forever' (Department of Planning, 2000, Volume 2, Table 11 and p. 493) to describe vegetation in Bush Forever sites. Four vegetation communities were represented on the site at a local level as follows:

- Eucalyptus Forrest – Low Closed Forrest of *Eucalyptus burracoppinensis* over very open grassland of introduced species.
- Grevillea Shrubland – Tall shrubland of *Hakea francisiana* over open shrubland of *Acacia neurophylla* subsp. *erugata* over open grassland of *Amphipogon caricinus* var. *caricinus*.
- Acacia Shrubland – Shrubland of *Acacia coolgardiensis* and *Acacia neurophylla* subsp. *erugata*, over low open shrubland of *Hakea francisiana* over a mix of herbs and grasses.
- Acacia Shrubland Granite Outcrop – Shrubland of *Acacia lasiocalyx*, over grassland of *Austrostipa flavescens* and *Aristida contorta*.

The Vegetation Condition was rated according to the Vegetation Condition Scale commonly used in the Perth Metropolitan Region (Government of WA 2000). In general, the vegetation condition ranged from "Completely Degraded" to "Very Good" in the project area.

The vegetation which will be impacted by the proposed clearing has been identified from the Flora Survey as 'Eucalypt Forrest' (eastern patch) and 'Grevillea Shrubland' (western patch). The vegetation condition of the Eucalypt Forrest was rated as 'Degraded'. The Grevillea Shrubland was rated as 'Good' and 'Very Good'.

A preliminary survey for habitat trees, in particular Black Cockatoo habitat trees, was undertaken. The assessment focused on the areas proposed for clearing and noted large trees in other areas of vegetation where possible, however it is likely that there are additional significant trees located in the areas not proposed for clearing - for example, in areas where there were multiple trees, only one GPS location was recorded. Significant trees (within the area to be cleared) with a diameter greater than 300mm (for *E. wandoo* and *E. salmonophloia*) were recorded as potential fauna habitat trees. Each tree was surveyed for health, species, diameter and the presence of hollows or multiple stems and recorded with a GPS location. These are depicted on the plans at Attachment 2. The full record of the results is within the Flora Survey (Del Botanicus, 2017).

The site is located at the edge of mapped modelled distribution of Carnaby's cockatoo as shown in the Commonwealth's 'EPBC Act Referral Guidelines for Three Threatened Black

Cockatoo Species' ('The Guidelines'). It is not within the mapped modelled distribution of Baudin's Cockatoo or Forest Red-tailed Black Cockatoo.

The habitat tree assessment identified 12 trees with a diameter greater than 300mm at breast height, and two locations where multiple significant trees were located together (14 points in total). These locations were identified as one GPS position even though multiple trees were present. There were large areas in the 'avoidance area' where large trees exist and which were not assessed. It is likely that there are more significant trees located on site in vegetation which will not be cleared as part of the proposed action. Six significant trees have been identified for removal. A much larger number of significant trees will be retained through avoidance and mitigation measures. It should also be noted that the Merredin Nature Reserve abuts the site and the Totadgin Conservation Reserves is approximately 1 km to the south-east. Both areas may provide some additional habitat area.

Hydrology and Water Features

There are a few minor drainage channels which run through the site which direct water from the rocky outcrops towards low-lying areas. The largest drainage channel flows from east to west through the south-west corner of Lot 19444 and through the northern end of Lot 194. The water from this drainage line is captured in a small dam on Lot 194. Over flow water from the dam flows in a north-west direction into the adjoining property to the north-west (Lot 5 on D67824). Another drainage channel flows north from the rocky outcrop on Lot 194 into Lot 5. Two drainage channels flow south from the rocky outcrop.

The drainage lines are not vegetated and are simply channels which offer the path of least resistance to water flow. Historic clearing and modification of the property for agriculture has most likely resulted in the alteration of natural watercourses and the formation of the existing drainage channels. They do not have any environmental value apart from their role in erosion control and movement of water throughout the landscape, and no downstream sensitive environment receptors or surface water dependent ecosystem are expected to occur or will be impacted by the proposed development.

The site is located within the Swan Avon – Yilgarn surface water catchment area.

No Public Drinking Water Source Areas are located across the site.

Heritage

No Registered or Other Heritage Sites have been identified on the site on the Department of Aboriginal Affairs heritage database. One survey has been conducted across the broader area which is described as surveys between Kalgoorlie and Perth to clear a route for Fibre Optic Cable Installation. If any heritage sites are identified during construction, there are provisions for dealing with this under the Aboriginal Heritage Act 1972.

No European heritage sites are listed by the State Heritage Office. The Shire of Merredin does not currently have a Local Municipal Inventory.

Principles for Clearing Native Vegetation

Information concerning the 10 clearing principles listed in Schedule 5 of the EP Act 1986 is provided below.

a) Native vegetation should not be cleared if it comprises a high level of biological diversity

The vegetation on the site has largely been highly disturbed from past agricultural use.

The vegetation which will be impacted by the proposed clearing has been identified from the Flora Survey as 'Eucalypt Forrest' (eastern patch) and 'Grevillea Shrubland' (western patch). The vegetation condition of the Eucalypt Forrest was rated as 'Degraded'. The Grevillea Shrubland was rated as 'Good' and 'Very Good'.

A description of the vegetation communities is provided below:

- Eucalyptus Forrest – Low Closed Forrest of *Eucalyptus burracoppinensis* over very open grassland of introduced species.
- Grevillea Shrubland – Tall shrubland of *Hakea francisiana* over open shrubland of *Acacia neurophylla* subsp. *erugata* over open grassland of *Amphipogon caricinus* var. *caricinus*.

A complete list of flora species is contained within the Flora and Vegetation Assessment report (Attachment 6).

Based on the Flora Survey, it is considered that the remnant vegetation proposed to be cleared does not have a high level of biological diversity as it has been previously disturbed by past agricultural use.

b) Native vegetation should not be cleared if it comprises the whole or part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia

The proposed clearing will only result in the removal of two small areas of vegetation and some isolated trees (approximately 4ha).

The proposed development area is not within the mapped modelled distribution of Baudin's Cockatoo or Forest Red-tailed Black Cockatoo and is at the eastern edge of the mapped distribution of Carnaby's Black Cockatoo.

The Flora Survey identified *Eucalyptus wandoo* and *E. salmonophloia* trees at or over 300mm in diameter at breast height, including some isolated trees in a paddock and some within the patches of remnant vegetation. The survey identified 12 trees, and two locations where multiple significant trees were located together (14 points in total). These locations were identified as one GPS position even though multiple trees were present. There were large areas in the 'avoidance area' where large trees exist and which were not assessed.

It is likely that there are more significant trees located on site in vegetation which will not be cleared as part of the proposed action.

Six trees have been identified for removal. A much larger number of significant trees will be retained through avoidance and mitigation measures. The significant trees proposed for retention are located within Eucalyptus Forrest or Granite Outcrop areas which provide additional habitat for fauna species. Most of the trees proposed for removal are isolated paddock trees, with the exception of one located at the southern end of an area of vegetation proposed for removal.

It is therefore considered that the removal of the 6 identified trees will not impact or compromise the whole or part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia.

c) *Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, rare flora.*

The Flora and Vegetation Assessment (Del Botanics, 2017) found that no species of Threatened (T), Priority Flora or Threatened Ecological Communities (TEC's) pursuant to the Biodiversity Conservation Act 2016 were located during the time of the survey. The botanical survey was undertaken in spring to coincide with the flowering times of the threatened species. The proposed development will therefore not impact or influence the continued existence of any rare flora.

d) *Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of a threatened ecological community.*

The Flora and Vegetation Assessment (Del Botanics, 2017) found that no species of Threatened (T), Priority Flora or Threatened Ecological Communities (TEC's) pursuant to the Biodiversity Conservation Act 2016 were located during the time of the survey. The botanical survey was undertaken in spring to coincide with the flowering times of the threatened species. The proposed development will therefore not impact or influence the maintenance of any TEC.

e) *Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.*

The remnant vegetation within the proposed development site has been influenced to a large extent by past and present agricultural activities (i.e. fragmentation, removal of understorey and groundcovers). Some patches of remnant vegetation exist on the site and surrounding properties in the immediate area.

The application proposes to clear 4.32 hectares of native vegetation (including isolated paddock trees) compared to 46.10 hectares of native vegetation which will be retained on the site. This equates to clearing of approximately 8.56% of the remnant vegetation on site.

Two conservation areas/reserves are located in close proximity to the site. The Merredin Nature Reserve (R19476) is located along the northern boundary of the site. This is an A Class reserve for Conservation, Fauna and Protection of Flora and has management orders with the Department of Biodiversity, Conservation and Attractions (previously Department of Parks and Wildlife). It is 90.73 hectares in size. The Totadgin Conservation Park (R1313) is located less than 1 kilometre to the south-west of the site. It is an A Class Reserve for the purpose of Conservation and has management orders with the Conservation Commission of WA. It is 257.77 hectares in size. Consequently, the remnant vegetation to be cleared (4ha) does not represent a significant part of the remnant vegetation in the general Merredin region.

f) Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.

No vegetation associated with a watercourse or wetland will be cleared as part of the proposed development. The two areas where remnant vegetation is to be cleared are located upslope.

The vegetation within the application area does not comprise of typical wetland species. No wetlands are located on the property.

It is considered that the proposed clearing will not have an adverse impact on the drainage lines on the site.

g) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.

The proposed site forms part of an existing farm, covering 530ha, with close to 90% already cleared of vegetation. The clearing of a further 4ha of remnant vegetation will therefore not result in or exacerbate land degradation or change the surface hydrological processes or the land surface's susceptibility to water or water erosion. 46.10 hectares of native vegetation will remain on the site.

The soil degradation characteristics have also been reviewed on the State Government online database which indicates that the site has low water erosion risk and a moderate wind erosion risk. There is also a low risk of waterlogging and inundation across the site.

Following clearing, solar panels are established across the site, along with any other associated infrastructure. The ground will continue to be covered in pasture and will be grazed by sheep following construction of the solar panels. Therefore, it is not considered that removal of vegetation within the application area will lead to land degradation.

- h) Native vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area.***

Merredin Nature Reserve is located to along the northern boundary of the site. This is an A Class reserve for Conservation, Fauna and Protection of Flora and has management orders with the Department of Biodiversity, Conservation and Attractions (previously Department of Parks and Wildlife). It is 90.73 hectares in size.

The Totadgin Conservation Park (R1313) is located less than 1 kilometre to the south-west of the site. It is an A Class Reserve for the purpose of Conservation and has management orders with the Conservation Commission of WA. It is 257.77 hectares in size.

The vegetation proposed for clearing comprises a small isolated patch and some isolated trees which are not linked to these conservation areas. The amount of vegetation proposed to be cleared is very small compared to the vegetation which will remain on the site (4.32 hectares is proposed for clearing out of a total area of 50.42 hectares), some of which is in degraded condition. The remaining vegetation patches will continue to allow for cockatoo movement from the nature reserve through the site. Therefore, it is not anticipated that removal of this vegetation will have a significant impact on biodiversity values of conservation areas in the vicinity.

- i) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.***

Given the small area of the remnant vegetation to be cleared (4ha, with 6 isolated trees), within a 530ha farm, removal of this vegetation will not influence surface hydrological or hydrogeological processes and thus will not have any impact on the quality of surface or groundwater. There are no wetlands or expressions of the groundwater on the property and there are no PDWSAs on or in close proximity to the site.

- j) Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence of flooding.***

The site has a low risk of flooding and waterlogging as the landscape is relatively elevated. In addition, the site is already predominantly cleared and drainage lines exist across the property to direct rainwater into dams. It is therefore not expected that the proposed clearing will exacerbate the incidence of flooding.

Additional Clearing Principles

The above 10 Clearing Principles address the biodiversity and conservation issues relating to a proposed clearing permit. Section 51O of the Environmental Protection Act also requires consideration of Planning Instruments and Other Matters. The additional Clearing Principles are described below to provide a more comprehensive assessment of the likely impacts of the proposed clearing.

1) *Environmental Protection Act 1986 Section 51O – Planning Instruments*

Planning Approval for the solar farm development has been issued by has already been provided by the Mid-West/Wheatbelt Development Assessment Panel (DAP) and the Shire of Merredin (Attachment 5).

2a) *Environmental Protection Act 1986 Section 51O – Relevant Matters*

Land Use Impacts

The development of the solar farm will primarily be on already cleared land currently used for agricultural purposes. In addition, the establishment of the solar farm will not prevent agricultural uses from continuing as the land can continue to be grazed by sheep through the spaces between solar panels.

The environmental impacts arising from the proposed land use will primarily be from the proposed clearing of approximately 4.32 hectares of vegetation. In comparison however the environmental, economic and social benefits of establishing a solar energy facility will be substantial. Use of renewable energy will reduce use of non-renewable energy resources which in turn will result in less overall environmental impact in the long term. Solar energy is a much more sustainable source of energy and will have significant economic and social benefits to the state and the country.

2b) *Environmental Protection Act 1986 Section 51O – Relevant Matters*

Previous decisions

The solar farm was assessed by the Mid-West/Wheatbelt Development Assessment Panel (DAP) and the Shire of Merredin and Planning Approval was issued. The planning application was not referred to the EPA for assessment.

2c) *Environmental Protection Act 1986 Section 51O – Relevant Matters*

Legislative Requirements

The proposed clearing has been referred to the Commonwealth Department of Environment and Energy in accordance with the *Environmental Protection and Biodiversity Conservation Act (EPBC) 1999*. This is due to the proposed clearing of trees (including Wandoo and Salmon Gum) greater than 300mm in diameter at breast height which, according to the Commonwealth's Guidelines (2012) is classified as 'breeding habitat' for black cockatoos. The site is located at the edge of mapped modelled distribution of Carnaby's Cockatoo as shown in The Guidelines.

No other approvals are required under different legislation.

2d) Environmental Protection Act 1986 Section 51O – Relevant Matters

Necessity

The mitigation sequence (as prescribed by the Department) was applied to the development to avoid and minimise impact where possible. The design of the solar farm took into consideration the existence of native vegetation and every effort was made to avoid clearing and disturbing native vegetation where possible. As such, only a small proportion (4.32 hectares) of the overall vegetation (50.42 hectares) is proposed for removal, which equates to approximately 8.56% of vegetation on site.

Possible alternatives, including not clearing, were considered. This would result in less solar panels and infrastructure across the site. The retention of the significant trees located in the paddock was considered, however as they are located in an otherwise cleared paddock and are relatively spaced out, to avoid these trees entirely would interrupt the design and would mean less solar panels can be established. This would in turn affect the feasibility of the operation as the more solar panels that be established the more renewable energy can be generated. The development has been designed to avoid areas of remnant vegetation elsewhere on the site.

Conclusion

It is requested that the Department of Water and Environmental Regulation considers this application to grant a clearing permit favourably. It is considered that the above information and the attachments provide adequate background information and justification for the clearing permit application.

Please contact the undersigned should you require any further information or clarification of any issue in the application. I look forward to hearing from you.

Yours sincerely,



Sharee Rasmussen
Land Insights
Planning – Design – Environment

14 November 2017

Cc: Troy Santen – Merredin Solar Farm Nominee Pty Ltd

Enc:

- Attachment 1 – Application Form
- Attachment 2 – Plans
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ATTACHMENT 1

Application Form