

Figure 2.1 Dams Providing Potential Water Sources to the Project

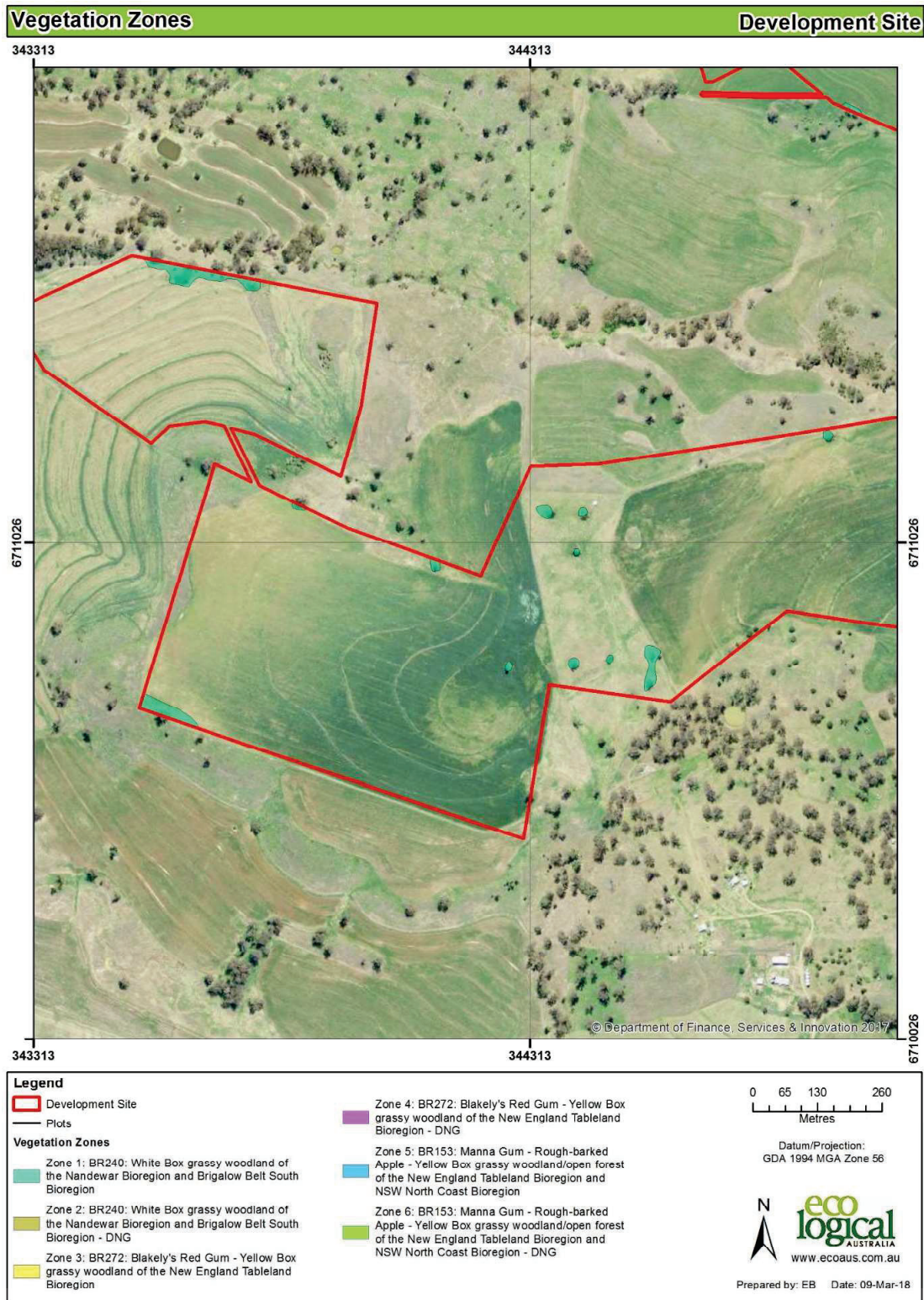


Figure 2.2 Plant Community Types in the Development Site (Detail 1)

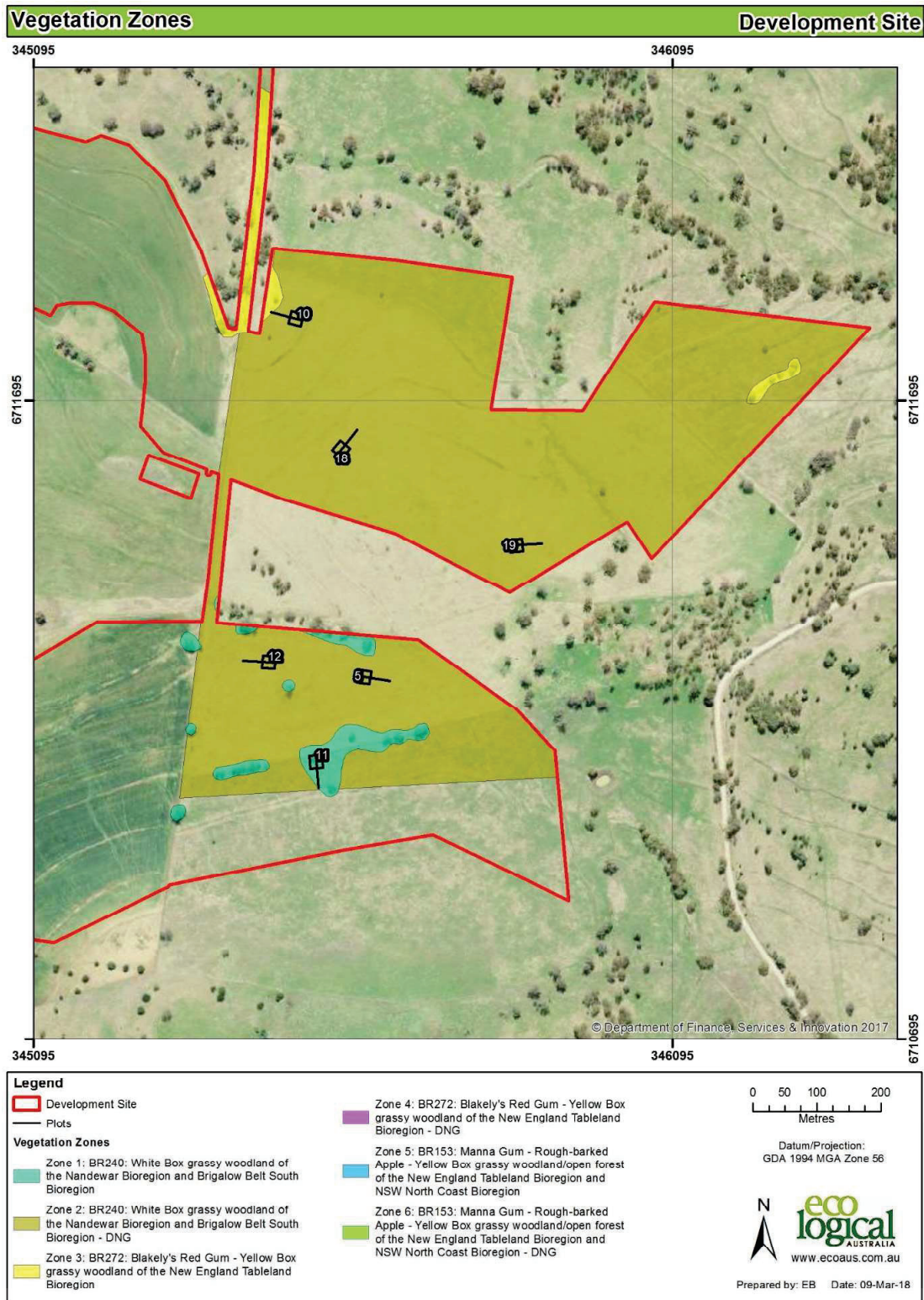


Figure 2.3 Plant Community Types in the Development Site (Detail 2)

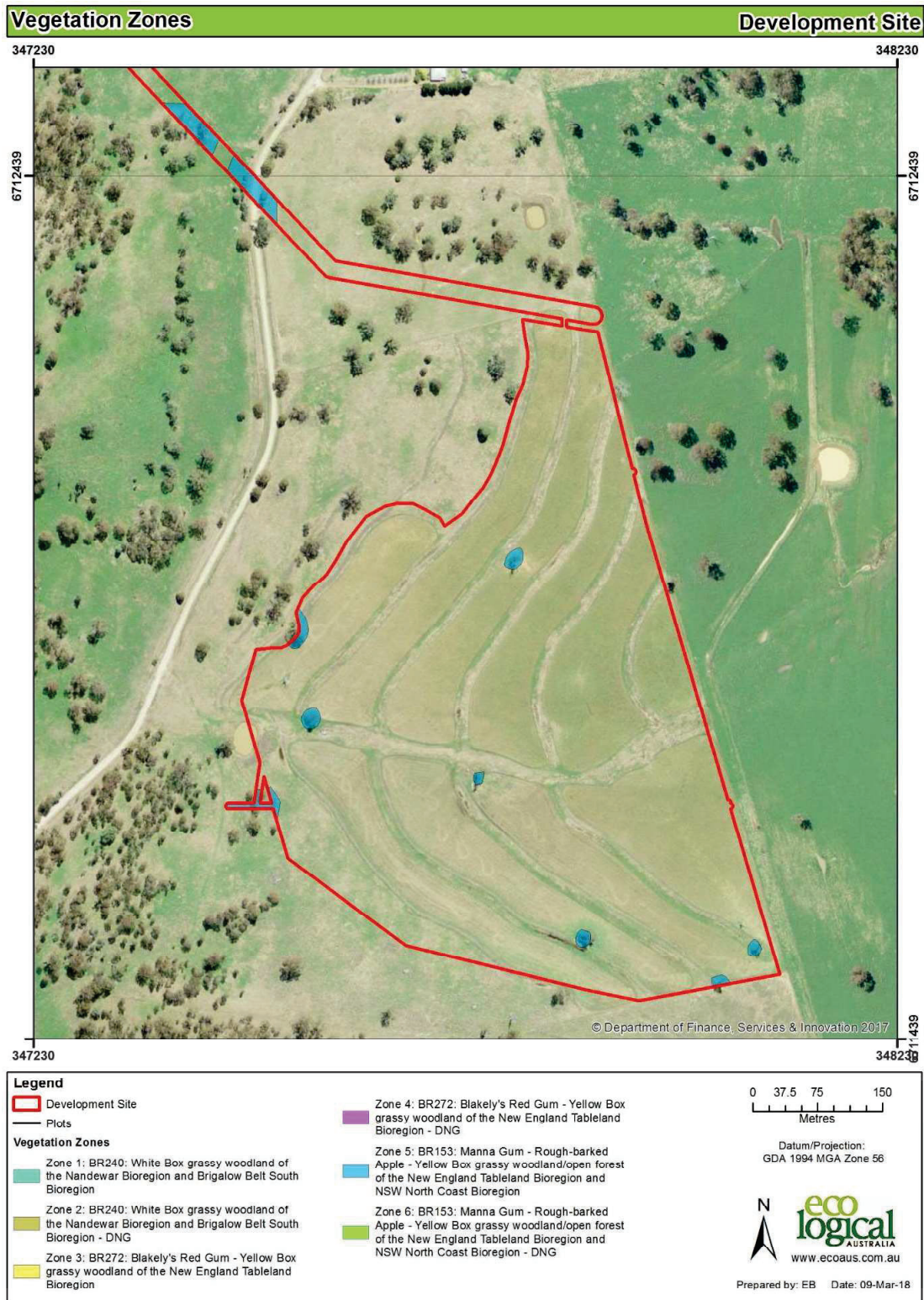


Figure 2.4 Plant Community Types in the Development Site (Detail 3)

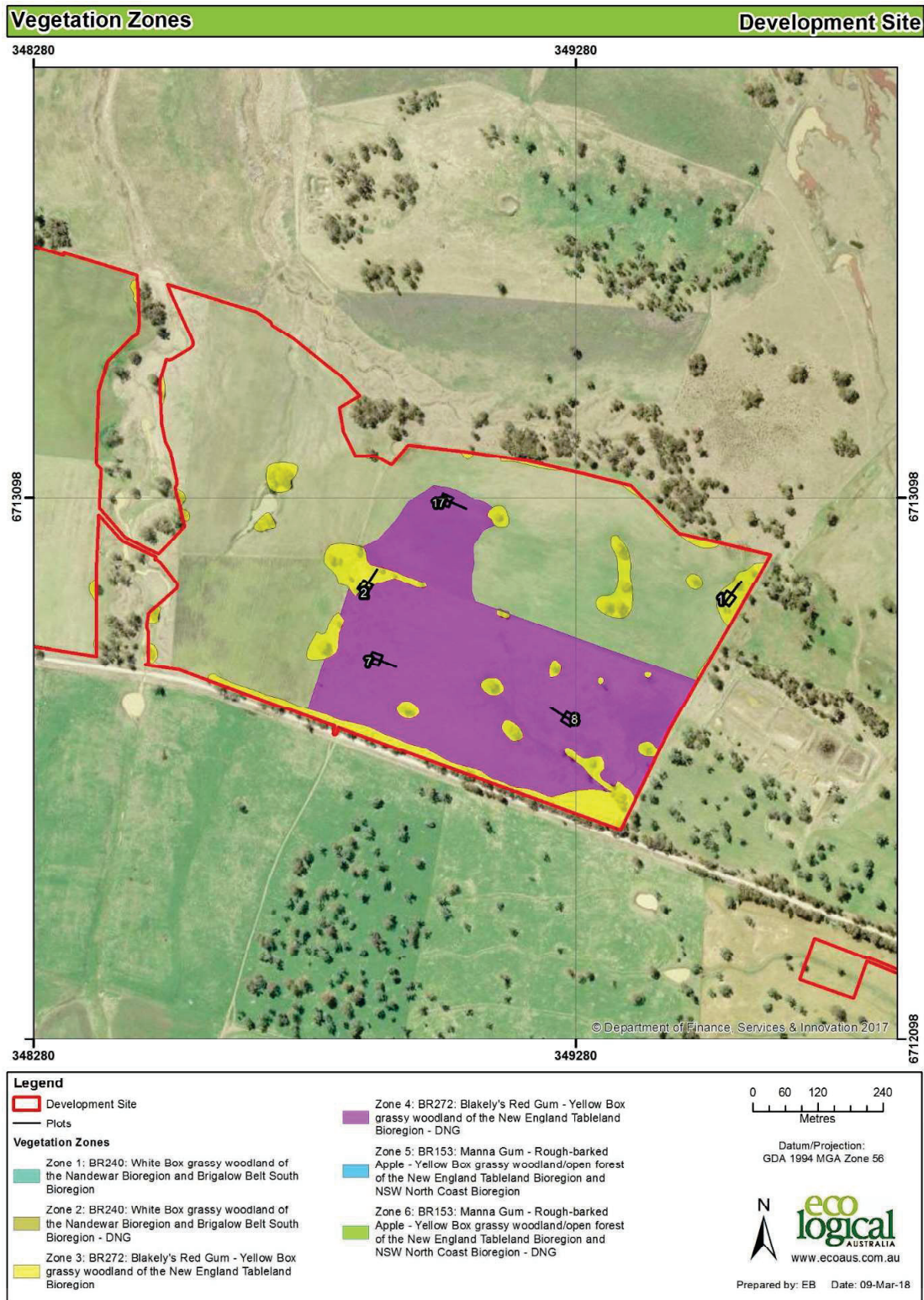


Figure 2.5 Plant Community Types in the Development Site (Detail 4)

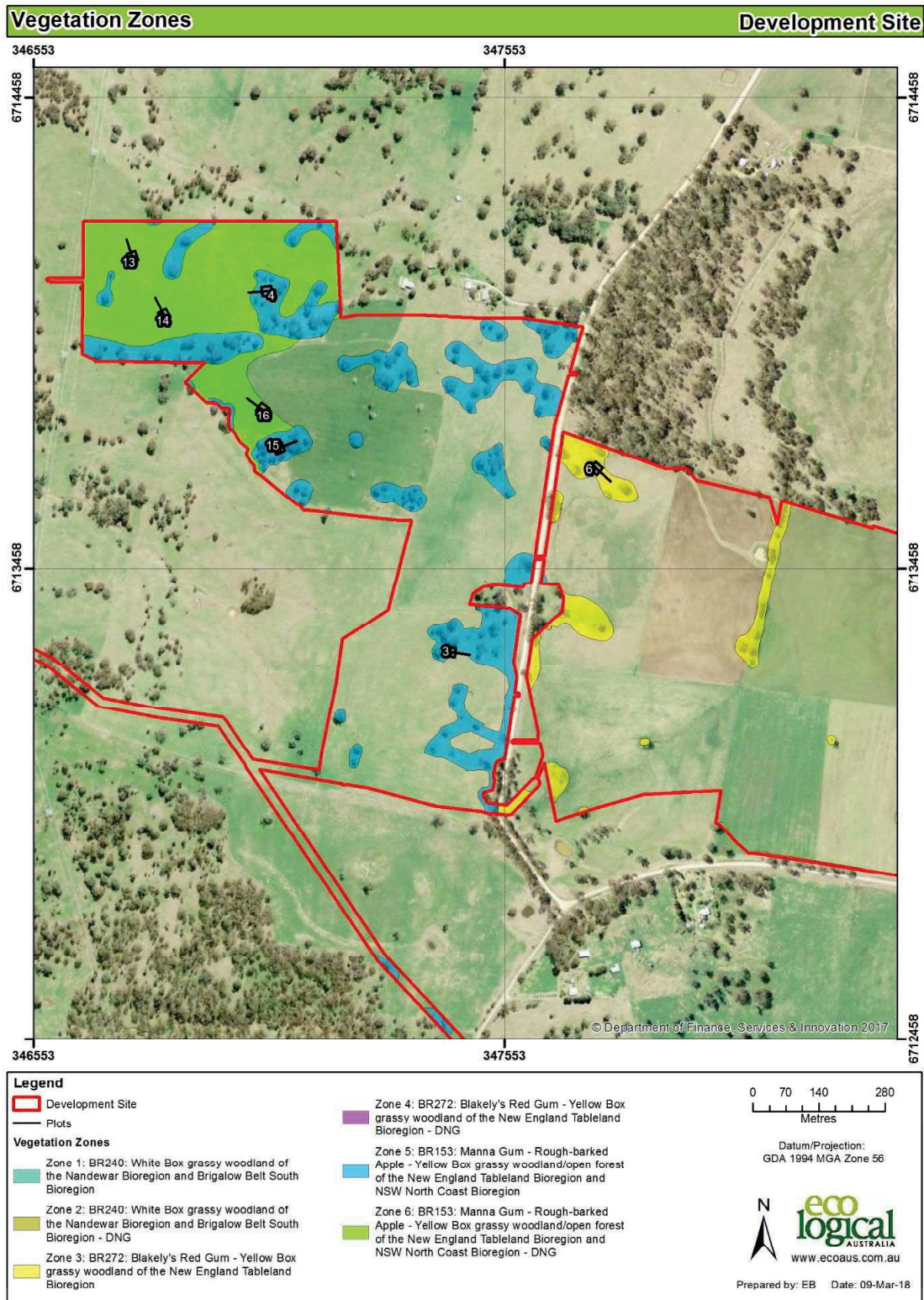


Figure 2.6 Plant Community Types in the Development Site (Detail 5)

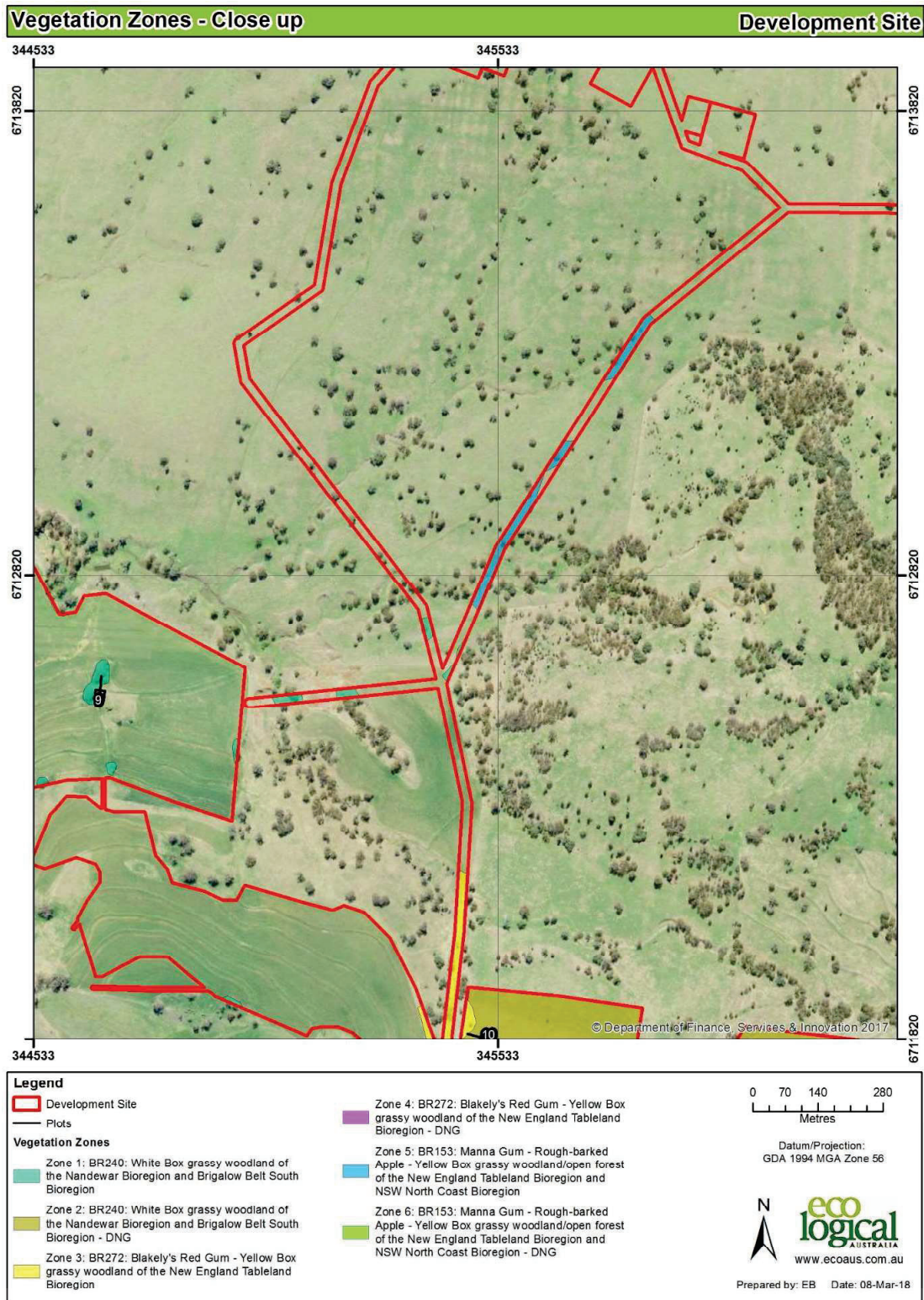


Figure 2.7 Plant Community Types Mapped in the Cable Routes and Access Tracks (Detail 1)

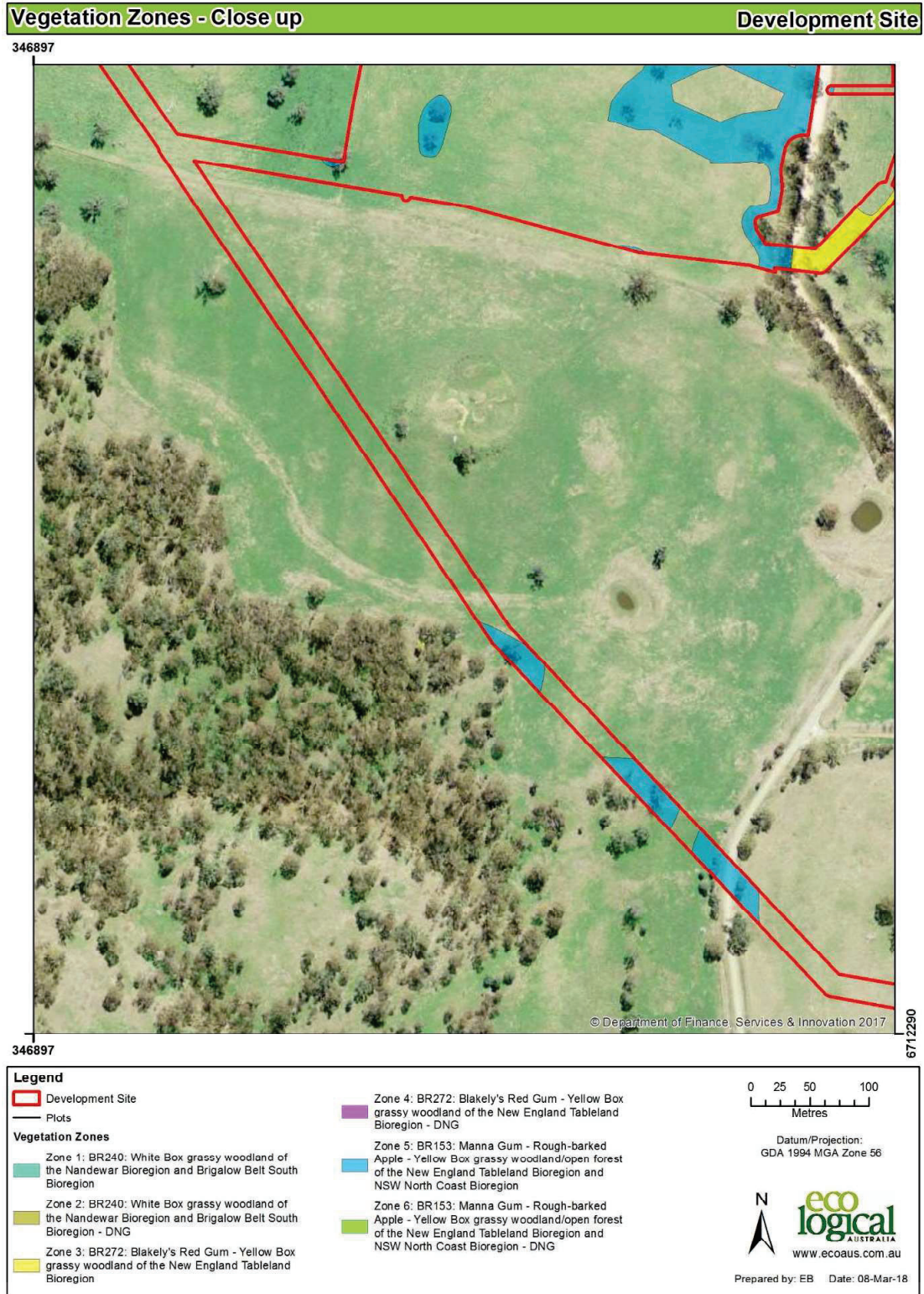


Figure 2.8 Plant Community Types Mapped in the Cable Routes and Access Tracks (Detail 2)

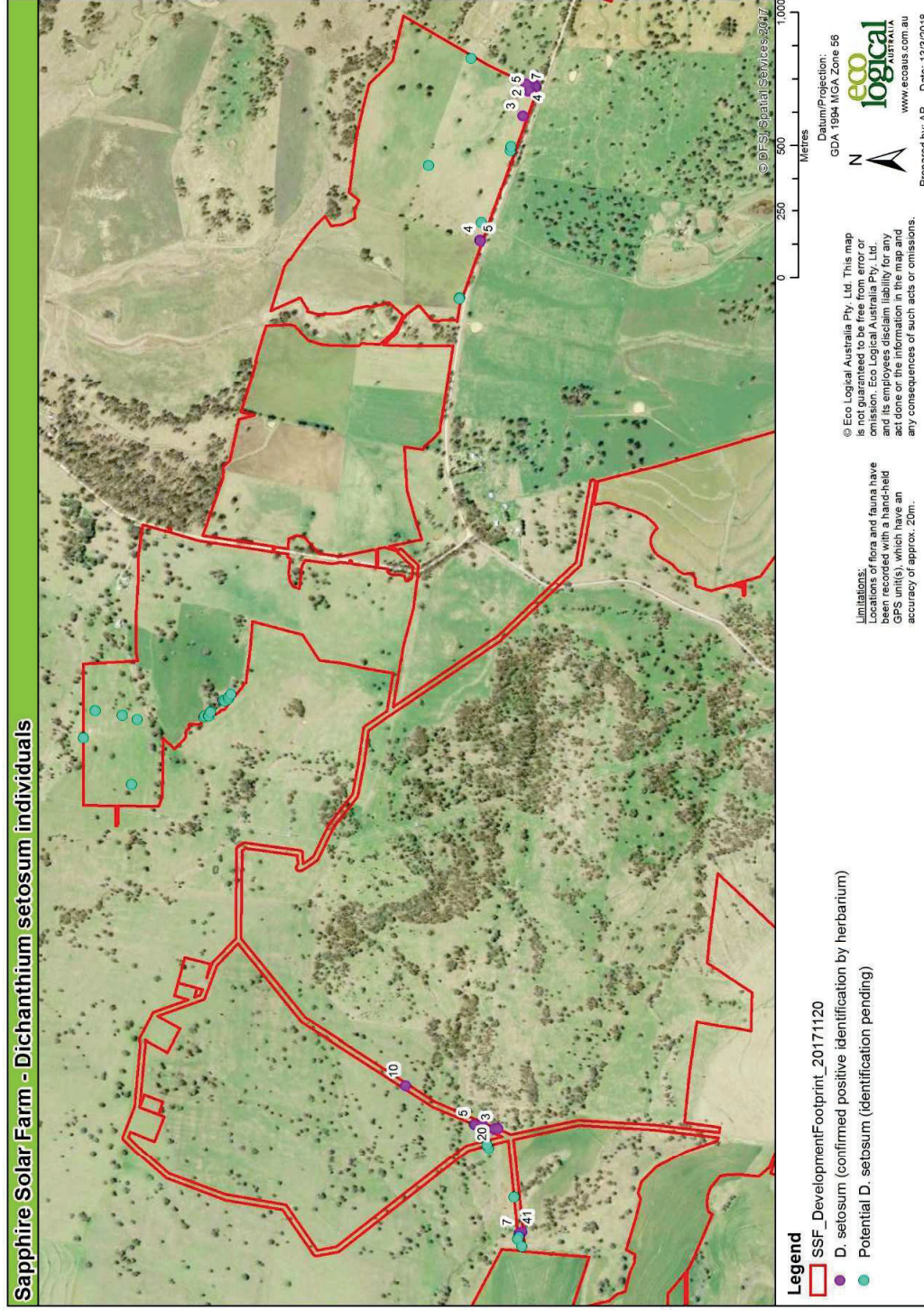


Figure 2.9 Threatened Flora Relative to the Development Site (Overview)

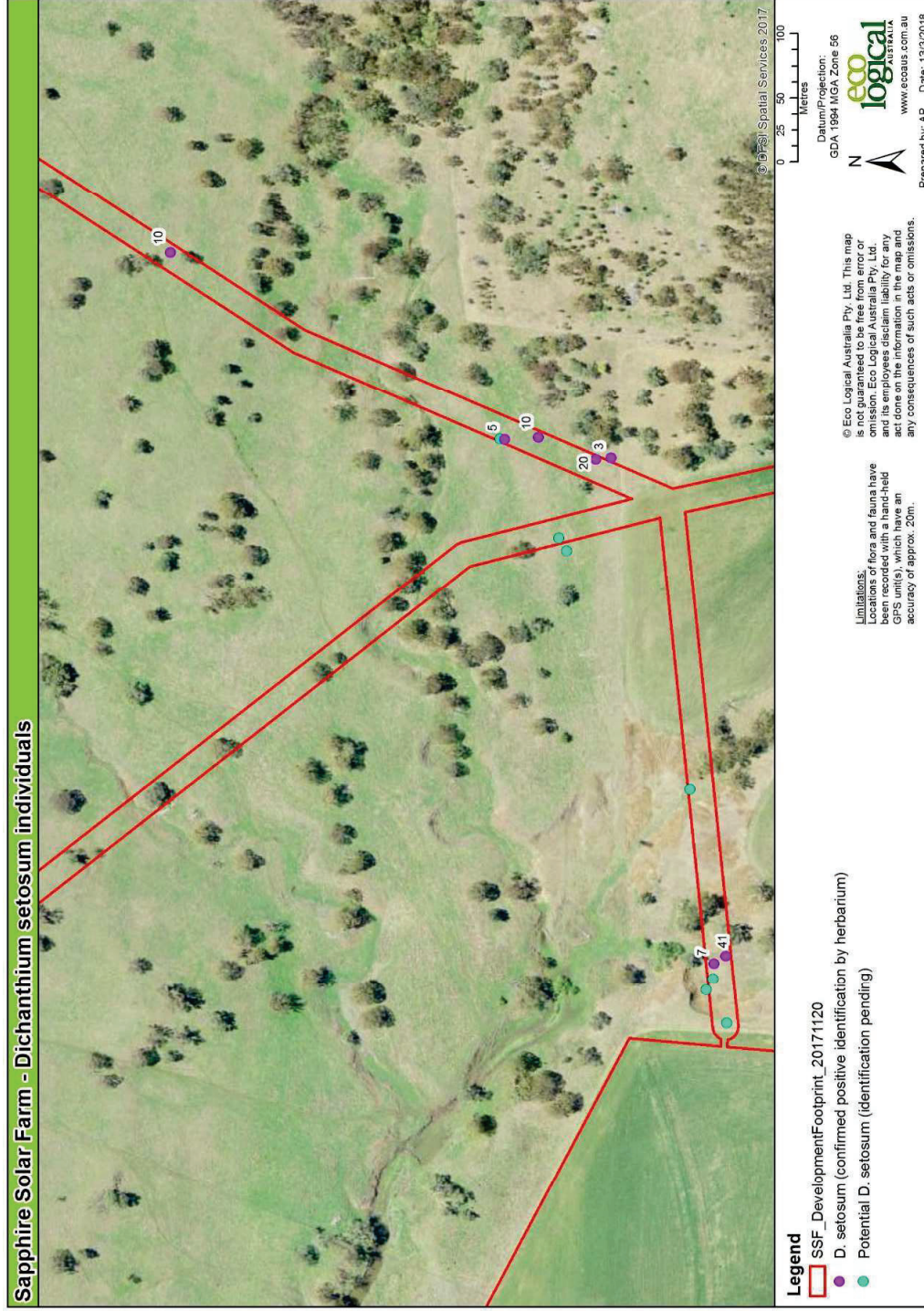


Figure 2.10 Threatened Flora Relative to the Development Site (Detail 1)

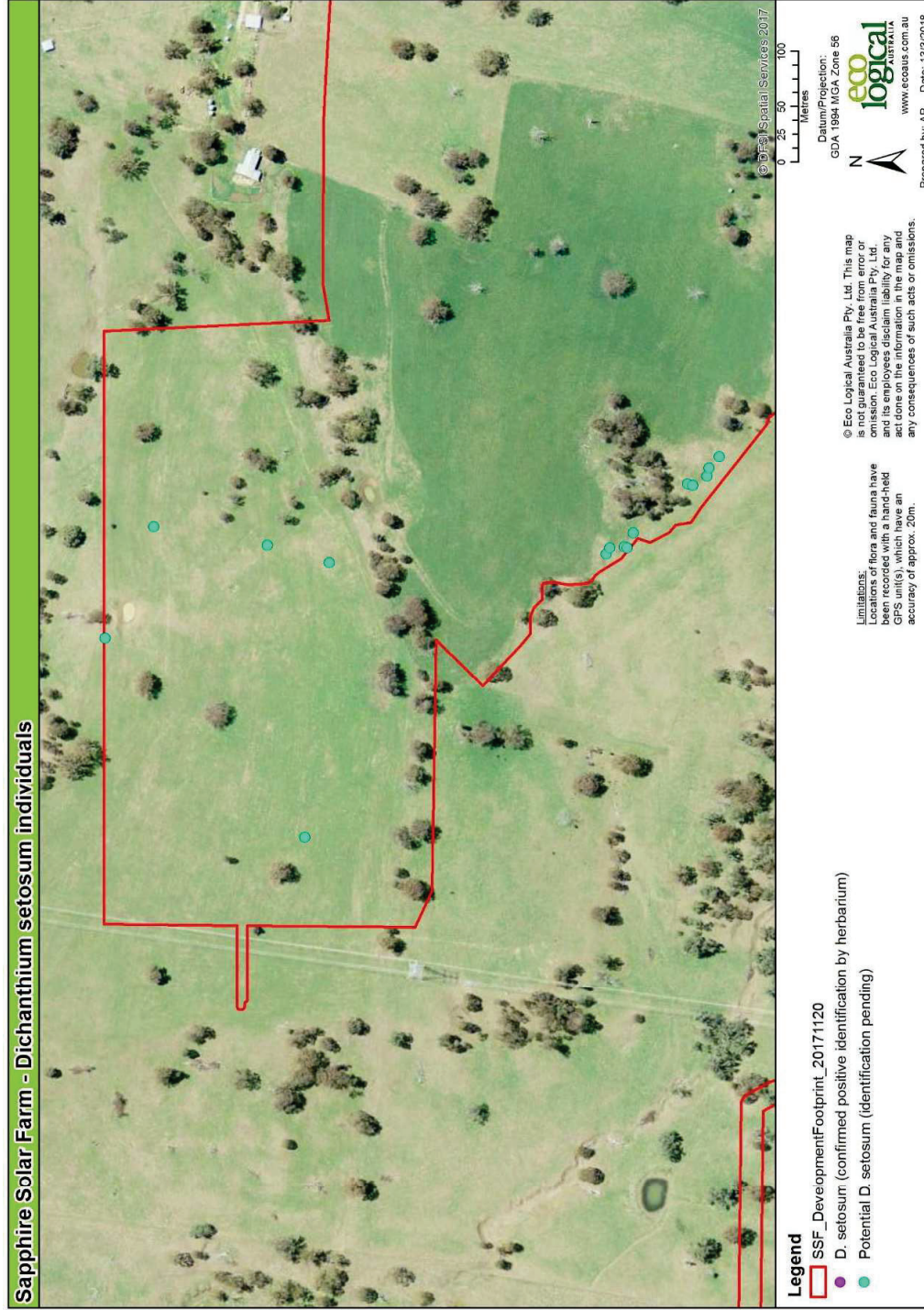


Figure 2.11 Threatened Flora Relative to the Development Site (Detail 2)



Figure 2.12 Threatened Flora Relative to the Development Site (Detail 3)

3 Public Submission Response

Table 3.1 contains responses to the public submission.

Table 3.1 Response to Public Submissions

Respondent	Suburb	Issue	Response
Gardner, Anthony	Braidwood	<i>We started the year with 25 solar farm applications in the NSW planning system, totalling 4340 MW of capacity. All were issued Sears in 2017. To this we add two new 2018 applications, Mulwala (140 MW) and Avonlie (200 MW) and subtract the recently approved Finley solar farm (170) MW. All the rest will be approved this year (assuming minimal developer competence) as that is what DPE does, and quickly. For example, Sears were issued for the Finley solar farm on July 5, 2017 and approval was granted on January 29, 2018, an elapsed time of less than 7 months, one of which was the exhibition period where it attracted no public submissions. Another rural community beaten into submission by an existing wind farm approval. In support of the Finley approval, DPE wrote: "It is estimated that an additional 5,400 MW of new renewable energy capacity will need to be built by 2020 to achieve the Renewable Energy Target". So the National target could conceivably be oversubscribed by these yet to be approved NSW solar farms and the approved NSW solar backlog, and that is without considering NSW wind farms, both approved but unbuilt, or in the approval pipeline. DPE has told us a number of times that it sees nothing untoward about this situation and its impact on NSW grid security and electricity prices, so we won't raise it again.</i>	Noted. The proponent along with other key participants in the energy sector are firmly of the view that renewable energy projects will continue to penetrate the energy generation mix beyond the current Federal or State renewable energy targets. As such, and noting that Federal and State renewable energy targets are not linked to the planning scheme, the Proponent agrees with the purported NSW Department of Planning and Environment (DPE) opinion expressed by the respondent.

RESPONSE TO SUBMISSIONS

<p>Gardner, Anthony</p>	<p>Braidwood</p>	<p><i>The Sapphire solar farm will include 100 MWh of battery storage, ostensibly to: “allow the dispatch of scheduled and reliable renewable energy generated power to the National Electricity Market”. Whilst that intention is a potential bi-product, the real aim is to charge the battery up with cheap power and to sell it into the NEM at peak prices. At the extremes, 100 MWh of electricity bought at zero and sold at \$14,000 per MWh means the electricity consumer will be charged \$1.4 million, one way or another. These price extremes are not unlikely as recently shown in SA, with its big Tesla battery taking advantage of the situation. That could happen multiple times per year, or daily at a lower profitability level. Battery storage is the latest scam to be inflicted on NSW electricity consumers. In a number of places in the Sapphire EIS, the developer talks about charging the battery from the Sapphire solar farm (SSF) or the Sapphire wind farm (SWF). However, in one section of the EIS, proof reading failed. From Page 15: “The connection configuration considered within this EIS accommodates for both scenarios, which will allow the battery-based storage facility within SSF to be available to charge from SSF, SWF and/or the NEM, and to discharge all its stored electricity to the NEM.” (my bolding) So this developer is innocently telling us that they plan to charge the battery with cheap reliable coal fired power from the grid (most likely overnight when power is cheaper and renewable energy is less or un-available from the Sapphire wind and solar farms), ready for discharge at tomorrow’s peak prices.</i></p>	<p>The proponent’s aim is to allow the dispatch of scheduled and reliable renewable energy generated power to the National Electricity Market. Price extremes are a function of the NEM, and pre-date the introduction of renewable energy. As noted above, renewable energy generation is increasingly out-competing the incumbent fossil fuel generation fleet within NEM. The connection configuration is no different to that of generators like hydro generators whereby storage is repowered during low price intervals in the market.</p>
<p>Gardner, Anthony</p>	<p>Braidwood</p>	<p><i>What is worse though is that the developer is seemingly going to charge the battery up with cheap, reliable coal</i></p>	<p>The respondent’s base position is misunderstood. Domestic coal-fired generated electricity is neither cheap nor reliable. In this regard the Proponent refers to the direction</p>

		<i>fired power and discharge it into the grid as renewables (how can you tell the difference?)</i>	of incumbent generators such as AGL whom are notably moving away from coal in NSW and into new renewable energy plant – in excess of Federal and State Renewable Energy Targets.
Gardner, Anthony	Braidwood	<i>What is potentially even worse is that this coal fired power could be eligible for Renewable Energy Certificates, which of course we consumers will also have to pay for through our electricity bills (how can you tell the difference?). Say it isn't so Mr Harwin or Mr Frydenberg.</i>	It isn't so. Only generation from the solar project would be eligible.

4 Administrative Revision of Environmental Impact Statement (Section 3.1.2)

Administrative correction is required to some detail contained in Section 3.1.2, Table 3-2, and Figure 3-3 of the Environmental Impact Statement (EIS) for this project regarding subdivision, due to some recent legal advice received by the Proponent. The changes concern the approach to subdivision of land required by the project and are very minor in nature. The text requiring amendment is the third paragraph of the EIS Section 3.1.2, which should be amended as demonstrated below (superseded text formatted with 'strikethrough' and new text shown in blue).

Some lots created as part of the Sapphire Wind Farm will be used as part of the Proposed Development ~~and as such, additional subdivision of these lots is not required.~~ For some of those SWF lots, they will now need to be the subject of a concurrent lease over only part of that SWF lot. Accordingly, additional subdivision of some of these lots will be required.

A revised table is presented (Table 4.1) which should replace Table 3-2 in the EIS, with Figure 4.1 below replacing 3-3 in the EIS.

Table 4.1 Resultant Lot Sizes from Leasing Purposes for the Project (updating EIS Table 3-2)

Lot/DP	Proposed Lot	Type	Area (ha)
1/1140309	1	Residual Lot	0.84
1/1140309	2	Residual Lot	1.27
1/1140309	3	Residual Lot	0.20
1/1140309	4	Residual Lot	0.41
1/1140309	5	Residual Lot	4.01
1/1140309	6	Residual Lot	5.38
1/1140309	7	PV Inclusion Area (from Cadastral Lot)	0.61
1/1140309	8	PV Inclusion Area (from Cadastral Lot)	0.00
1/1140309	9	PV Inclusion Area (from Cadastral Lot)	0.47
1/1140309	10	PV Inclusion Area (from SWF Deemed Subdivision)	0.08
1/1140309	11	PV Inclusion Area (from SWF Deemed Subdivision)	0.18
1/1140309	12	PV Inclusion Area (from SWF Deemed Subdivision)	1.36
1/1140309	13	PV Inclusion Area (from SWF Deemed Subdivision)	0.38
1/128314	1	Residual Lot	49.97
1/128314	2	Residual Lot	0.37
1/128314	3	Residual Lot	0.92
1/128314	4	PV Inclusion Area (from Cadastral Lot)	1.72
1/128314	5	PV Inclusion Area (from Cadastral Lot)	35.08
1/128314	6	PV Inclusion Area (from SWF Deemed Subdivision)	18.88
1/128314		PV Inclusion Area (from SWF Deemed Subdivision)	4.63

Lot/DP	Proposed Lot	Type	Area (ha)
1/435844	1	Residual Lot	15.47
1/435844	2	Residual Lot	0.00
1/435844	3	Residual Lot	67.29
1/435844	4	Battery Location (from SWF Deemed Subdivision)	0.62
1/435844	5	Battery Location (from SWF Deemed Subdivision)	0.37
1/435844	6	Battery Location (from SWF Deemed Subdivision)	0.43
1/435844	7	O&M & Compound Locations (from SWF Deemed Subdivision)	0.26
1/435844	8	O&M & Compound Locations (from SWF Deemed Subdivision)	0.00
103/651984	1	Residual Lot	15.51
103/651984	2	PV Inclusion Area (from SWF Deemed Subdivision)	0.09
13/750121	1	Residual Lot	32.71
13/750121	2	Battery Location (from SWF Deemed Subdivision)	0.16
13/750121	3	Battery Location (from SWF Deemed Subdivision)	0.17
13/750121	4	O&M & Compound Locations (from SWF Deemed Subdivision)	0.38
133/753316	1	Residual Lot	64.11
133/753316	2	PV Inclusion Area (from Cadastral Lot)	1.13
139/750121	1	Residual Lot	31.02
139/750121	2	Battery Location (from SWF Deemed Subdivision)	0.84
139/750121	3	O&M & Compound Locations (from SWF Deemed Subdivision)	0.00
16/750121	1	Residual Lot	32.06
17/750121	1	Residual Lot	98.23
18/750121	1	Residual Lot	33.25
2/1200772	1	Residual Lot	3.21
2/1200772	2	Residual Lot	0.42
2/1200772	3	Residual Lot	2.05
2/1200772	4	Residual Lot	0.00
2/1200772	5	Residual Lot	0.55
2/1200772	6	Battery Location (from SWF Deemed Subdivision)	0.22
2/1200772	7	Battery Location (from SWF Deemed Subdivision)	0.00
2/1200772	8	Battery Location (from SWF Deemed Subdivision)	0.20

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Lot/DP	Proposed Lot	Type	Area (ha)
2/1200772	9	O&M & Compound Locations (from SWF Deemed Subdivision)	0.11
201/1227324	1	Residual Lot	149.67
201/1227324	2	Residual Lot	15.73
201/1227324	3	Residual Lot	0.51
201/1227324	4	Residual Lot	0.44
201/1227324	5	Residual Lot	0.65
201/1227324	6	Residual Lot	0.00
201/1227324	7	Residual Lot	1.52
201/1227324	8	Residual Lot	0.08
201/1227324	9	PV Inclusion Area (from Cadastral Lot)	56.38
201/1227324	10	PV Inclusion Area (from Cadastral Lot)	57.02
201/1227324	11	PV Inclusion Area (from Cadastral Lot)	60.70
202/1227324	1	Residual Lot	18.16
202/1227324	2	Residual Lot	0.11
202/1227324	3	PV Inclusion Area (from Cadastral Lot)	0.76
202/1227324	4	PV Inclusion Area (from SWF Deemed Subdivision)	3.83
209/750121	1	Residual Lot	6.94
265/750076	1	Residual Lot	101.39
265/750076	2	Residual Lot	293.94
265/750076	3	Residual Lot	0.05
265/750076	4	Residual Lot	143.93
265/750076	5	Residual Lot	30.40
265/750076	6	PV Inclusion Area (from Cadastral Lot)	9.56
265/750076	7	PV Inclusion Area (from Cadastral Lot)	6.01
265/750076	8	PV Inclusion Area (from Cadastral Lot)	3.56
265/750076	9	PV Inclusion Area (from Cadastral Lot)	7.57
265/750076	10	PV Inclusion Area (from SWF Deemed Subdivision)	9.17
265/750076	11	PV Inclusion Area (from SWF Deemed Subdivision)	0.09
265/750076	12	PV Inclusion Area (from SWF Deemed Subdivision)	19.74
265/750076	13	PV Inclusion Area (from SWF Deemed Subdivision)	16.92
265/750076	14	PV Inclusion Area (from SWF Deemed Subdivision)	3.78
265/750076	15	PV Inclusion Area (from SWF Deemed Subdivision)	0.07

Lot/DP	Proposed Lot	Type	Area (ha)
266/750076	1	Residual Lot	579.85
266/750076	2	O&M & Compound Locations (from SWF Deemed Subdivision)	0.83
48/753316	1	Residual Lot	19.59
48/753316	2	PV Inclusion Area (from Cadastral Lot)	0.78
49/753316	1	Residual Lot	0.00
49/753316	2	Residual Lot	15.47
49/753316	3	PV Inclusion Area (from Cadastral Lot)	7.19
57/753316	1	Residual Lot	0.04
57/753316	2	Residual Lot	5.55
57/753316	3	PV Inclusion Area (from Cadastral Lot)	6.05
79/753316	1	Residual Lot	27.70
79/753316	2	PV Inclusion Area (from Cadastral Lot)	13.61
81/753316	1	Residual Lot	65.97
81/753316	2	Residual Lot	1.67
81/753316	3	Residual Lot	0.00
81/753316	4	PV Inclusion Area (from Cadastral Lot)	20.38
81/753316	5	PV Inclusion Area (from Cadastral Lot)	39.41
99/753316	1	Residual Lot	0.77
99/753316	2	Residual Lot	9.62
99/753316	3	PV Inclusion Area (from Cadastral Lot)	11.81
99/753316	4	PV Inclusion Area (from SWF Deemed Subdivision)	1.61
99/753316	5	PV Inclusion Area (from SWF Deemed Subdivision)	0.31
99/753316	6	O&M & Compound Locations (from SWF Deemed Subdivision)	0.33

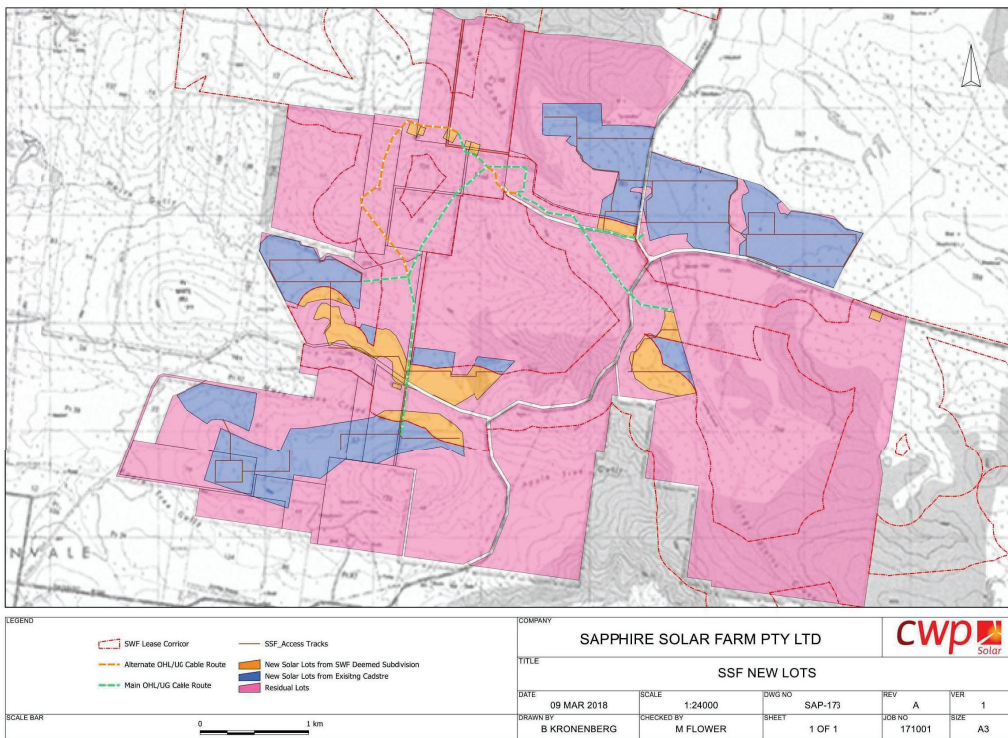


Figure 4.1 New Lots Created by the Project