

# Template for comments on applications under the *Native Vegetation Regulations 2017*

## Application to which these comments apply:

Cultana Solar Farm near Whyalla, involving clearing approximately 1,100 ha of native vegetation

## Your details:

*All comments will be considered anonymous, however you must provide your details for verification of your comments to the Native Vegetation Branch.*

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## Key Points:

*Provide the main points to why you are making comment.*

NCSSA's main concern is that the clearance of native vegetation for solar farms is an increasing practice. Whilst we support SA's transition to a low-carbon economy, we do not believe this need result in the clearance of precious remnant native vegetation. This proposal for 1,110ha of clearance is in addition to the almost 4,000ha of clearance for solar farms which has been approved since 2016.

In relation to this specific proposal, we do not believe the 'avoid' component of the mitigation hierarchy has been adequately addressed. We are also unclear as to whether the close proximity of Block A to the Whyalla Conservation Park has been adequately reflected in the calculations for an SEB.

Although the layout for the panels appears to have been determined, as the vegetation condition of Block B appears more degraded than Block A, we would encourage any further efforts to concentrate clearance and disturbance in Block B, as this would likely result in a conservation of higher quality vegetation.

## Comments in relation to the [Mitigation Hierarchy](#):

*The proposal must demonstrate the measures taken to avoid and minimize impacts on biodiversity and rare or threatened species or ecological communities within the property or immediate vicinity of the development. For example, measures taken to avoid clearance of native vegetation by using alternate locations or design to reduce the impact of the clearance.*

We do not see any demonstration that alternative locations were considered for this solar farm in the Data Report. A brief review on Google Maps suggests that there are pockets of land in reasonably close proximity to the One Steel plant that have already been cleared. In order to adequately demonstrate adherence to the first step of the Mitigation Hierarchy ('avoid'), and therefore to gain approval, the Data Report should summarise why alternate locations that did involve clearance were not selected.

NCSSA acknowledges that the Data Report details plans to minimize impacts within the chosen site, including avoiding woodland areas and habitat for the Western Grasswren, 'where possible'.

**Comments in relation to compliance with the regulation and the Level 4 [Risk Assessment](#):**

*Provide any supplementary information on the proposed area for clearance, including in relation to the technical requirements of the regulation or information to support the Level 4 assessment.*

Although the layout for the panels appears to have been determined, as the vegetation condition of Block B appears more degraded than Block A, we would encourage any further efforts to concentrate clearance and disturbance in Block B, as this would likely result in a conservation of higher quality vegetation.

**Comments in relation to the Significant Environmental Benefit (SEB):**

*An SEB is required for approval to clear under Division 5: Risk Assessment of the regulations. The NVC must be satisfied that as a result of the loss of vegetation from the clearance that an SEB will result in a positive impact on the environment that is over and above the impact of the clearance. The Data Report must propose how the SEB will be achieved in accordance with the [SEB Policy and Guide](#)*

Although the Data Report appears to have followed the 'Native Vegetation Rangelands Assessment Manual' methodology, NCSSA is concerned that the proximity of Block A to the Whyalla Conservation Park may not be adequately accounted for. Although dissected by the Lincoln Highway, part of Block A is nonetheless contiguous with the Conservation Park and the benefit of this for ecological connectivity should be considered.

**General comments in relation to the *accuracy and representativeness* of the information provided in the application:**

**Representation at the Native Vegetation Assessment Panel**

All comments will be made available in full to the Native Vegetation Assessment Panel (NVAP) for consideration prior to making a decision.

Additionally, there is an opportunity for you to request to appear personally or through a representative to the NVAP should you believe that your comments can be elaborated for the benefit of NVAP.

NVAP may not accept your request for representation should it consider your written submission is not directly relevant to application, does not provide any additional information to what is currently available, is factually inaccurate or does not address the requirements of the legislation, Native Vegetation Council policy or Guidelines, such as the mitigation hierarchy or the adequacy and appropriateness of the SEB.

**I would like to attend YES/NO**

***Only comments received within 28 days of receiving the application will be considered.***

**Please send your comments to the Native Vegetation Council at [nvc@sa.gov.au](mailto:nvc@sa.gov.au).**

**For more information**

**Native Vegetation Branch**

Department of Environment,  
Water and Natural Resources

T (08) 8303 9777

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