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Attn: Katrina O'Reilly

Team Leader - Compliance

NSW Department of Planning, Industry and Environment

4 Paramatta Square, 12 Darcy Street

Parramatta NSW 2150

Dear Ms. O'Reilly

Jemalong Solar PV Project SSD8803 – Response to Environmental Audit

Thank you for your acceptance of the Independent Environmental Audit ('IEA') in the letter dated 13 November 2020 (Appendix A).

As requested in the letter, we hereby wish to provide our response to the three Opportunities for Improvement ('OFI's) as identified in the IEA.

OFI1: Date of Construction

Following the receipt of the draft IEA, Genex submitted to the Department an email clarifying the commencement of construction date. This was provided to the Department on 04 November 2020 (Appendix B). It was subsequently provided to the Auditor who acknowledged satisfaction in the final IEA (see p5 of the approved IEA).

OFI2: Rural Airfield

Following the receipt of the draft IEA, Genex provided evidence to the Auditor previous correspondence and consultation with the airfield owner and operator (Appendix C). Subsequently, the Auditor acknowledged satisfaction of this OFI in the final IEA (see p5 of the approved IEA).

OFI3: Soil stabilisation measures

Following receipt of the draft IEA, Genex discussed this item with the Construction Manager, who was present during the Audit. It was determined that this OFI was a misunderstanding of where the Project boundary was situated, with the 'areas for improvement' situated outside of the construction boundary within Council jurisdiction (refer Appendix D). Due to the jurisdiction involved, Genex and its Contractors are unauthorised to make any changes to this area.

If you have any questions, please don't hesitate to contact me at hh@genexpower.com.au or on 0408024851.

Kind regards,

A handwritten signature in black ink, appearing to read 'HH' with a stylized flourish below it.

Harrison Holihan

Commercial Manager

Genex Power Limited

Appendix A: Audit Letter.



Mr Harrison Holihan
Commercial Manager
Genex Power Limited
LEVEL 6 28-34 O'Connell Street
SYDNEY New South Wales 2000

13/11/2020

Dear Mr Holihan

**Jemalong Solar - IEA 2020 (SSD-8803)
Independent Environmental Audit**

Reference is made to the Independent Environmental Audit (IEA) report for the Jemalong Solar - IEA 2020, prepared as required by Schedule 4 condition 7 of SSD 8803 (the consent) and submitted to the Department of Planning, Industry and Environment (the Department) on 5 November 2020.

The Department considers that the IEA report generally satisfies the reporting requirements of the consent. Please note that acceptance of this report is not endorsement of the compliance status of the project. It is noted that the company did not provide a separate response to the recommendations contained in the audit report. It is requested that a response to the three Opportunities for Improvement (OFI) identified in the IEA is provided to the Department within 14 days of this letter.

It is also noted that the IEA identified that the EIS for the project was not on the site's website. Can you please ensure in accordance with Schedule 4 condition 8 of the consent that the EIS, the IEA and the company's response is uploaded to the website within 21 days of this letter.

If you wish to discuss the matter further, please myself on 0429400261 or at katrina.oreilly@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. O'Reilly', enclosed in a thin black rectangular border.

Katrina O'Reilly
Team Leader - Compliance
Compliance

As nominee of the Planning Secretary

Appendix B: OFI1

From: [Harrison Holihan](#)
To: [Natasha Homsey](#)
Subject: FW: SSD8803 - Request for Early Construction due to COVID-19
Date: Wednesday, 4 November 2020 9:39:02 PM
Attachments: [image023.png](#)
[image029.png](#)
[SSD8803 - Commencement of Construction.pdf](#)
[image013.png](#)

Hi Natasha,

The Independent Environmental Auditor has just completed the draft report and one of the recommendations they have put forward is that we provide to you with an update on the actual physical commencement of construction as there was a discrepancy in the paperwork.

As per this email trail and the attached notification, we advised the Department that construction would commence on 25 April 2020. However, the actual date of physical works commencing on site was not until 22 May 2020.

The reason for this difference is due to a combination of factors, with the strongest contributor being the poor weather conditions that we have unfortunately succumb to this year.

This was raised by the Auditor as a recommendation, rather than a compliance issue, so thought it was best to provide this update to you in this manner.

It has not impacted any other timelines, including the due date of the audit report which will be provided well before the required date.

Please let me know if you have any questions, if you need this more formally or submitted via the portal.

Thank you

Kind regards,

Harrison Holihan | Commercial Manager



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From: Harrison Holihan

Sent: Friday, 24 April 2020 7:49 PM

To: Natasha Homsey <Natasha.Homsey@planning.nsw.gov.au>

Cc: Iwan Davies <iwan.davies@planning.nsw.gov.au>; James Harding <jh@genexpower.com.au>; Arran McGhie <am@genexpower.com.au>; Wendy Moloney <wm@genexpower.com.au>; Coburn, Justin <jucoburn@beon-es.com.au>; McCutcheon, Andy <amccutcheon@beon-es.com.au>

Appendix C: OFI2

Harrison Holihan

From: Lee Maxwell <LMaxwell@cfma.com.au>
Sent: Wednesday, 16 October 2019 8:54 PM
To: Harrison Holihan
Subject: Jemalong Solar

Hi Harrison,

Further to the below, Optifarm acknowledge that as owners of this land and the airstrip, that in accordance with CASA's email below, the responsibility is on Optifarm's pilots to ensure that the flights conducted from this airstrip are safe. We acknowledge that the responsibility lies with us to advise any pilots intending to use the airstrip of the existence of the power lines and that our pilots will not use the site without confirming with Optifarm beforehand the condition of the airstrip and any hazards on or near the airstrip.

Regards

Lee Maxwell



M: 0408 441 355 | E: lmaxwell@cfma.com.au

Hi Harrison,

Yes, fully understand that Genex are not planning to move the substation to the western end of the airstrip. I fully understand the plans that Genex are undertaking and have no objections to them. I also support the safety recommendations that have been outlined by CASA. Optifarm have no objections to the plans regarding the airstrip and the location of the powerlines.

Regards

Lee Maxwell



M: 0408 441 355 | E: lmaxwell@cfma.com.au

From: Harrison Holihan <hh@genexpower.com.au>
Date: Friday, 11 October 2019 at 3:29 pm
To: "DVanderstok@cfma.com.au" <DVanderstok@cfma.com.au>, Lee Maxwell <LMaxwell@cfma.com.au>
Cc: Arran McGhie <am@genexpower.com.au>, Wendy Moloney <wm@genexpower.com.au>, Justin Clyne <jc@genexpower.com.au>
Subject: Modification 3 - Airstrip

Hi Dee and Lee,

As part of the update to the development consent for Mod-3 to revise the transmission line from underground to overhead in certain sections (which you have already helpfully provided a letter of support for), we were required to consult with CASA to ensure they had no objections to our proposal prior to checking with you given Optifarm are the owners and operators of the private airstrip.

CASA's response to this is copied below. Please note that the references to moving the substation are outdated and we did not proceed with this change.

We wanted to communicate to you that we will be enforcing the recommendations in yellow for everyone's safety which I am sure you will have no objections to/would welcome.

Just to reiterate as well, the 66kV transmission line will start ~250-300m away from the western end of the airstrip.

The Department of Planning would just like to confirm that you have no objections to our proposal and acknowledge and agree with all statements in the email below. If you could please provide confirmation of this via written response asap (hoping to send this back to the Department tonight if possible) that would be greatly appreciated.

As always, please give me a call if you wish to discuss anything and thank you again for your support.

Kind regards,

Harrison Holihan | Commercial Manager



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Good morning Arran,

The relocation of the substation from the southern boundary to the north east corner of the site does put the building closer to the runway but as this particular airstrip is not regulated by CASA the responsibility is on the pilot to ensure that the flight conducted from this airstrip is safe. I understand from previous correspondence that the use of the strip is generally restricted to once or twice a year. The responsibility lies with the airstrip operator to advise any pilots intending to use the airstrip of the existence of the substation and power lines and a pilot should not use the site without confirming with the airstrip operator beforehand the condition of the airstrip and any hazards on or near the airstrip.

With regard to any action recommended for Genex Power in relation to the proposal, CASA acknowledges that without lighting or navigational aids, the airstrip is only usable during daylight hours in visual flying conditions. Therefore there is little benefit or need to highlight the substation itself to approaching pilots by marking in orange and white paint. The powerline however will be raised and difficult for a pilot to identify. Therefore CASA would recommend that **marker balls be placed on the first span of the powerlines north of the substation to highlight the existence of the power line for approaching pilots. While not necessary, it may also be beneficial for all parties for the first power pole adjacent to the substation to be painted in contrasting bands of orange and white to ensure pilots are aware of the height and start of the raised power line.**

For your consideration.

Regards

Matthew Windebank

Aerodrome Engineer

Air Navigation, Airspace & Aerodromes Branch

CASA \ Aviation Group

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From: Griggs, Shaun
To: [Harrison Holihan](#)
Date: Wednesday, 16 December 2020 1:09:39 PM
Attachments: [image001.png](#)
[B.jpg](#)
[C.jpg](#)
[A.jpg](#)

Hi Harrison ,

As discussed, when the Audit was conducted there was an opportunity for improvement in regards to the Soil Stabilisation. This was then clarified it was outside of the construction site boundary along Wilbertroy and Naroo Lane leading to the site. This is either council easement or farmers property which is under their control. See attached pictures of when the grass was starting to grow back and now the farmer has ploughed the paddock to the road edge ready for cropping.

- Photo A (looking towards Silos) approximately 55M of disturbed ground where vehicle 'bypass' was installed for road upgrade
- Photo B (looking towards Silos) vegetation starting directly along shoulder of Wilbertroy Road
- Photo C Landowner has cultivated the ground in preparation for planting summer crop / or preparation for 2021 crop

- The disturbed ground (55M in sections) that was required for Wilbertroy lane upgrade has now been cultivated by landowners.

Any questions or you need anything else let me know.

Thanks
Shaun

Shaun Griggs
Construction Manager



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W. beon-es.com.au

Energy from every angle

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