



NSW RURAL FIRE SERVICE



The Secretary
NSW Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Your Ref: SSD 9438
Our Ref: DA20191113000982

ATTENTION: Tatsiana Bandaruk

17 December 2019

Agency Comment: Bonshaw Solar Farm, Bruxner Highway, Bonshaw (Inverell LGA)

Dear Ms Bandaruk,

I refer to NSW Planning, Industry and Environment correspondence dated 30 October 2019 seeking comment from the NSW Rural Fire Service (RFS) regarding bush fire protection requirements for the above State Significant Development application.

The NSW RFS has received and reviewed the Environmental Impact Statement. NSW RFS understands the development proposal is for a large-scale solar photovoltaic (PV) generation facility with a capacity of 200 megawatts, which includes:

- a network of PV modules in a fixed tilt or single axis tracking arrangement;
- associated battery energy storage system / battery storage;
- a switch yard to be connected to the 330kV Transgrid Dumaresq Station;
- underground or overhead cabling for connection between arrays, inverters and transformers; operations and maintenance infrastructure
- access point to the Bruxner Highway;
- new internal road network; and
- temporary facilities during construction.

The subject land is partly mapped as bush fire prone land by Inverell Shire Council. Further, the NSW RFS is the primary response agency for all structural fires on the land.

It is noted that the Bushfire Hazard Assessment report includes broad scale vegetation, slope and bush fire hazard mapping. Based on this mapping, a 10 metre asset protection zone (APZ) is recommended around the perimeter of the development. It appears that in some locations around the site, a 10 metre APZ may be insufficient to ensure that the development is not subject to flame contact from a bush fire, due to the prevailing slope and vegetation classes. Accordingly, the NSW RFS recommends that a more detailed assessment of the development site perimeter be undertaken to determine appropriate APZs. While a 10

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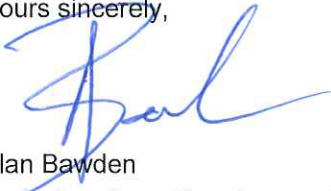
metre APZ is supported for grassland vegetation, a larger APZ may be required where the development is adjacent to woodland and/or forest vegetation. It is further recommended that minimum APZs be based on Table A2.5 of 'Planning for Bush Fire Protection 2006'.

In addition to the above, the NSW RFS recommends the following conditions be included in any approvals granted for the project:

1. A Fire Management Plan (FMP) shall be prepared in consultation with NSW RFS Northern Tablelands Fire Control Centre. The FMP shall include:
 - 24 hour emergency contact details including alternative telephone contact;
 - site infrastructure plan;
 - fire fighting water supply plan;
 - site access and internal road plan;
 - construction of Asset Protection Zones (APZ) and their continued maintenance;
 - location of hazards (physical, chemical and electrical) that will impact on fire fighting operations and procedures to manage identified hazards during fire fighting operations;
 - fire mitigation strategies as outlined in Section 4 of the Bushfire Hazard Assessment report prepared by ERM (ref: Project No. 0470861), dated 26 July 2019; and
 - such additional matters as required by the NSW RFS District Office (FMP review and updates).
2. The entire solar array development and associated infrastructure footprint is to be managed as an Asset Protection Zone as outlined within section 4.1.3 and Appendix 5 of 'Planning for Bush Fire Protection 2006' and the NSW Rural Fire Service's document 'Standards for Asset Protection Zones'.
3. A 50,000 litre water supply (tank) fitted with a 65mm storz fitting shall be located adjoining the internal property access road within the required APZ.
4. To allow for emergency service personnel to undertake property protection activities, a defensible space (APZ) that permits unobstructed vehicle access is to be provided around the perimeter of each of the solar array areas and associated infrastructure.

For any queries regarding this correspondence, please contact Paul Creenaune on 6691 0400.

Yours sincerely,



Alan Bawden

**Team Leader – Development Assessment & Planning
Planning and Environment Services (North)**

The RFS has made getting information easier. For general information on 'Planning for Bush Fire Protection, 2006', visit the RFS web page at www.rfs.nsw.gov.au and search under 'Planning for Bush Fire Protection, 2006'.