



ACT
Government

Environment, Planning and
Sustainable Development

Andy Nixey
Team Leader, Energy Assessments,
NSW Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Mr Nixey,

Submission regarding Wallaroo Solar Farm Environmental Impact Statement (SSD-9261283)

Thank you for the opportunity to review the Environmental Impact Statement (EIS) for the Wallaroo Solar Farm State Significant Development proposal (application number SSD-9261283).

The ACT Environment, Planning and Sustainable Development Directorate (EPSDD) has previously provided comments on the request for Secretary's Environmental Assessment Requirements (SEARs). EPSDD's comments primarily related to construction of electrical transmission lines in or near the ACT, impacts on urban development at Ginninderry (ACT) and Parkwood (NSW), impacts on biodiversity and environmental offset sites in the ACT, bushfire risks and consultation between the proponent and sensitive receivers in the ACT.

Impact Assessment, EPSDD, has reviewed the EIS and has the following comments.

It is noted there may be an indirect impact from the proposal on the Jarramlee/West Macgregor Grasslands Nature Reserve and on regional ecological connectivity. The Jarramlee/West Macgregor Grasslands Nature Reserve protects high environmental values including critically endangered Natural Temperate Grassland (NTG) and habitat for the endangered Golden Sun Moth.

Environmental values:

- The management strategy to rehabilitate land to previous productive land use, post solar farm life, will have flow on effects to Jarramlee Nature Reserve and NTG. Measures should be included to prevent cover crops from entering the reserve and fertilisers should not be used anywhere near the reserve and NTG.

- Sediment control fencing is only proposed in relation to aquatic habitat. Sediment and litter control fencing should be installed along the fence line with Jarramlee Nature Reserve to prevent impacts on the reserve.
- The EIS states that large machinery cannot be used for weed control while the panels are in place. It is therefore unclear how weeds are going to be adequately controlled in a way that will not spread to the nature reserve.
- The utilisation of a 10m buffer in addition to the exclusion fencing around Jarramlee is recommended for consideration. This would help avoid and minimise impacts to NTG from disturbance of soils in the construction area, litter, soil and overland flow after periods of high rainfall, and would provide some protection from soil improvement strategies.

Bushfire risk:

- The site is within 1 km north-west of the western edge of the ACT built up area, with the intervening area being an important ecological habitat (i.e. environmental offset). It is noted that the offset area is sensitive to inappropriate fire regimes. The proposal is also around 1 km south-west of a cluster of rural residential properties along Wallaroo Road. This space is sufficient to allow a fire originating from the proposal to develop full rate of spread and intensity with limited warning. As such, robust controls through construction and operation will be required to manage the risk of bushfire ignition.
- It is recommended that the Construction Environmental Management Plan (CEMP), and Operational Plan/Environment Management Plan include provisions for the cessation of works on days of total fires bans. Additionally, the operational plans for the facility should consider how the operation of the BESS units can be further safeguarded on days of elevated fire danger by limiting their use and risk of thermal runaway or other failure.
- The 40,000 L water tank is likely to be insufficient. The amount of water available on site should be reviewed and confirmed as appropriate by ACT/NSW fire agencies, noting the problematic nature of battery fires. There also does not seem to be any outline of how this will be refilled, apart from rainfall harvested from roofs, which may be unreliable in drought conditions.

It is noted that the proposal may have a level of visual impact on sensitive receivers in the ACT. It is recommended that ongoing consultation with potentially affected sensitive receivers should continue and implementation of further mitigation measures to reduce visual impacts.

EPSDD looks forward to receiving the determination decision from the NSW Department of Planning and Environment on the Wallaroo Solar Farm proposal.

Please feel free to contact me via epdimpact@act.gov.au if you would like to discuss.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dominic Riches', with a stylized flourish at the end.

Dominic Riches
A/g Senior Director, Impact Assessment/Business Support
Statutory Planning Division

22 June 2023