

Our ref: OUT26/2171

Rita Hatem
Planning Group
NSW Department of Planning, Housing and Infrastructure

Email: Rita.Hatem@planning.nsw.gov.au

31 March 2026

Subject: Garoo Solar Farm (SSD-79747209) – Environmental Impact Statement

Dear Rita Hatem,

I refer to your request for advice sent on 26 February 2026 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

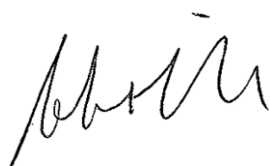
The NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and makes recommendations to:

- Provide an updated diagram of waterfront land based on distances from the top of bank of the watercourse and ensure the infrastructure footprint is consistent with the buffer zone requirements in the Guidelines for Controlled Activities on Waterfront Land.
- Quantify maximum annual operational site water demands and confirm a viable water source.
- Confirm excavation depths of proposed works and groundwater levels.
- Quantify the groundwater take from aquifer interference activities where required.

Please see Attachment A for further detail.

Should you have any further queries in relation to this submission please do not hesitate to contact the DCCEEW Water Assessments team at water.assessments@dcceew.nsw.gov.au.

Yours sincerely



Rob Brownbill,
Manager, Water Assessments, Planning and Knowledge Division
NSW Department of Climate Change, Energy, the Environment and Water

Attachment A

Detailed advice to DPHI Planning & Assessment regarding the Garoo Solar Farm (SSD-79747209) – EIS

1.0 Works on waterfront land

1.1 Recommendation – pre-determination

That Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to:

- Provide an updated diagram of mapped waterfront land based on the top of the bank.
- Review the infrastructure footprint to ensure consistency with the buffer requirements of the Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2025) and redesign where required.

Explanation

Insufficient information has been provided to determine the scope of works on waterfront land. The documentation has incorrectly identified waterfront land as being offset 40m from the mapped hydroline, whereas it should be defined as 40m from the top of bank of each watercourse as it currently exists on ground. A map/diagram outlining works on waterfront land based on 40m from top of bank and demonstrated consistency with the Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2025) is required.

1.2 Recommendation – post approval

DPHI requests the proponent to ensure works on waterfront land are designed, constructed and maintained in accordance with the Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2025).

Explanation

Works on waterfront land are required for the project which include but is not limited to the design and construction of the crossing over Tamarang Creek and other watercourse crossings. The Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2025) is a relevant guideline that needs to be addressed.

2.0 Water supply, take and licensing

2.1 Recommendation – pre-determination

DPHI requests the proponent to:

- Quantify the maximum annual operational site water demands.
- Confirm if agreements with Councils extend to meet water demands for the operational phase or demonstrate viable alternative water sources.

Explanation

Insufficient information has been provided to confirm the operational water demands and the availability of a secure water supply. The construction water demands have been quantified

at 56.1 ML/yr however no volumes or water sources have been provided for the operational period. Further information is required to ensure a secure water supply is available and if there are any additional impact assessment or water licensing considerations.

2.2 Recommendation – pre-determination

DPHI requests the proponent to:

- Provide clarification of the potential for aquifer interference activities through confirmation of maximum excavation depths and groundwater levels at the site.
- Quantify the maximum annual volume of water take where aquifer interception is required and demonstrate sufficient entitlement can be obtained unless an exemption applies.

Explanation

Insufficient information has been provided to confirm if groundwater will be intercepted by the project. The proponent has indicated that the level of excavation required for infrastructure on site is well above the observed groundwater levels on the site, however groundwater levels are unclear and excavation depths are not provided. It is also not clear whether the statements made include the footings required for the proposed bridge which characteristically have deeper footings than buildings on a slab. Further clarification is required.

For guidance on aquifer interference assessment requirements please see the following links: [Groundwater assessment toolbox for SSD/SSI](#) and [Minimum requirements for building site groundwater investigations and reporting](#).

2.3 Recommendation – pre-determination

If the take of groundwater is found to be greater than 3 ML per year, DPHI should request the proponent to assess impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). Please refer to the following documents:

- <https://www.water.dccceew.nsw.gov.au/sites/default/files/2025-10/NSW-Aquifer-Interference-Policy-2012.pdf>
- <https://www.water.nsw.gov.au/sites/default/files/2025-07/Aquifer-Interference-Assessment-Framework.pdf>

Explanation

As per Recommendation 2.2 above, further clarification is requested on potential groundwater take for the project. Additionally, the EIS has not provided an assessment of impacts to groundwater due to construction or operation of the project. NSW DCCEEW Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume and assess impacts should the take exceed 3 ML/yr.

End Attachment A
