



OUT20/16058

Javier Canon
Planning & Assessment
NSW Department of Planning, Industry and Environment

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Dear Mr Canon

Stubbo Solar Farm (SSD 10452) – EIS

I refer to your email of 18 December 2020 to the Department of Planning, Industry and Environment (DPIE) Water and the Natural Resources Access Regulator (NRAR) about the above matter. The following recommendations are provided by DPIE Water and NRAR.

Pre-approval Recommendation

- The proponent should confirm access to a secure water supply for the project.

Comment: Insufficient information has been provided to confirm access to a secure water supply for this project. Options to source the 73ML/yr of water required for the project's construction have been proposed, which include farm dams, commercial suppliers of treated wastewater and accessing town water supplies. The ability to obtain the necessary water from these sources and any associated agreements and impact assessments has not been provided. This represents a commercial risk to the project.

Post Approval Recommendations

The proponent must:

- Obtain relevant approvals and licences under the *Water Management Act 2000* before commencing any works which intercept or extract groundwater or surface water (unless an exemption applies) or for any works which have the potential to alter the flow of floodwaters.
- Prepare a Construction and Operational Environmental Management Plan (incorporating an Erosion and Sediment Control Plan) prior to commencement of activities.

It is recommended this be developed in accordance with industry standards including the guideline 'Managing Urban Stormwater: Soils and Construction' (Landcom 2004) and relevant specific measures to address the high erosion risk at the project site.

Comment: The site is recognised to have a significant erosion risk if the soils are disturbed or exposed. This represents a significant risk for the project with the potential for erosion and sedimentation within both the project site and downstream and resulting impacts to agricultural land and watercourses. This is of most risk during the construction phase but will also need to be adequately managed during the operation phase. Specific management controls will need to be developed with regular monitoring and maintenance. The EIS has proposed relevant measures in Table 9-1 and 14-2. It is recommended however that the conditions listed in Section 14.3.1 be specifically included to mitigate a significant impact.

- Ensure any works within waterfront land are in accordance with the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018).

Yours sincerely

Liz Rogers
Manager, Assessments
Water – Knowledge Office
9 February 2021