

Our ref: OUT24/19473

Cameron Ashe
Planning Group
NSW Department of Planning, Housing and Infrastructure

Email: cameron.ashe@dpie.nsw.gov.au

18 December 2024

Subject: Gundry Solar Farm (SSD-48225958) – Environmental Impact Statement (EIS)

Dear Cameron Ashe,

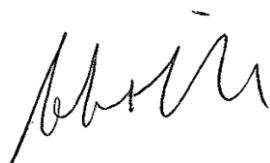
I refer to your request for advice sent on 14 November 2024 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

The proposed development includes the construction, operation, maintenance and decommissioning of an approximate 400 Megawatt peak (MWp) (DC) solar photovoltaic (PV) generation facility with a Battery Energy Storage System (BESS) of up to 555 MWp / 1,570 Megawatt hour (MWh) capacity.

NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and has recommendations regarding water supply, works on waterfront land and sewage management. Please see **Attachment A** for more detail.

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

Yours sincerely



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

Attachment A

Detailed advice to DPHI Planning & Assessment regarding the Gundry Solar Farm (SSD-48225958) - EIS

1.0 Water supply, take and licensing

1.1 Recommendation – pre-determination

Department of Planning, Housing and Infrastructure request the proponent to clarify the ability to obtain the necessary water volumes to meet the proposed site water demands.

Explanation

Insufficient information is provided to confirm the ability to source water for the project. The proponent identifies 12.6ML will be required over the 18-to-24-month construction period with 3ML/year required during operation. Multiple water sources are listed but it is unclear on the feasibility of these. For any third-party sources such as commercial suppliers, existing bores, existing dams or council supply options it is recommended the proponent consult with these third parties to ensure there is availability and to confirm if additional licences/approvals and assessments are required.

The proponent also provides a summary of maximum harvestable rights for the project area, however this is based on the project area rather than the landholding which is required for harvestable rights. The proponent must review their assessment for use of water taken under harvestable rights to demonstrate if this is a viable water supply option. Noting this should be done in consultation with landowners to ensure they have sufficient availability for their own use and that water taken under harvestable rights can only be used on that landholding.

2.0 Groundwater impacts and dewatering requirements

2.1 Recommendation – post determination

Department of Planning, Housing and Infrastructure advise the proponent that if the take of groundwater is found to be greater than 3 ML per year, the proponent must assess the impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). These documents are available at:

- https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0005/151772/NSW-Aquifer-Interference-Policy.pdf
- https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0007/171097/Aquifer-Interference-Assessment-Framework.pdf

Explanation

The project presents a low risk to groundwater as it proposes shallow excavations, and the water table is likely too deep to be intercepted. However, the possibility of groundwater interception remains.

NSW DCCEEW Water Group concurs with the statement in Section 6.12.3.5 of the EIS:

“Should the final Project design identify that construction activities will result in the interception of the groundwater table, further assessment will be undertaken in accordance with the *NSW Aquifer Interference Policy* (NSW Government, 2012) and appropriate management measures be developed to mitigate any potential impacts.”

3.0 Activities on waterfront land

3.1 Recommendation – pre-determination

Department of Planning, Housing and Infrastructure request the proponent to clarify the proposed infrastructure layout meets the buffer requirements from watercourses as defined in the Guidelines for Controlled Activities on Waterfront Land (DPE 2022).

Explanation

The site generally provides buffer zones along the 3rd order and above watercourses except in the western section of the site where there appears to be a construction compound and substation proposed. This will be over a mapped third order watercourse. the Guidelines for Controlled Activities on Waterfront Land can be found here:

<https://water.dpie.nsw.gov.au/our-work/licensing-and-trade/controlled-activity-approvals/guidelines>

4.0 Sewage management

4.1 Recommendation – pre-determination

Department of Planning, Housing and Infrastructure request the proponent to confirm with the relevant local water utility or other wastewater treatment provider if the system can accommodate the proposed sewage demands without impacting existing services.

Explanation

The proponent proposes sewage from septic tanks generated during construction and operation to be transported off-site, however there is no reference to engagement with the relevant water utility to confirm whether there is capacity in the system to accept the waste volumes.

End Attachment A
