Stantec Australia Pty Ltd. Level 4, 99 Walker Street, NORTH SYDNEY NSW 2060



September 20, 2020

File: 3600727160.300.40.41

Attention: Mr. Tim Baker, Senior Water Regulation Officer
Department of Planning, Industry and Environment
Natural Resources Access Regulator
4 Parramatta Square, 12 Darcy Street
Parramatta, NSW 2150

Dear Mr. Baker,

Reference: Gunnedah Solar Farm Draft Water Management Plan (WMP) – Phase 2 – Response to Comments – Reference Number V17/8273#4

This letter brief has been prepared to respond to comments provided by the New South Wales (NSW) Department of Planning, Industry and Environment (DPIE) Water Regulatory Operations Group, dated September 17, 2020 (attached). For reference, comments have been provided in **bold** text with responses in *italics*.

The Secretary should have received correspondence agreeing to the change. Subject to adequate monitoring, the department does not object.

Noted.

Further detail is required about what would happen in the event of fence monitoring in flood conditions showing a build-up of debris leading to increased upstream flooding? Are there actions that could be undertaken to relieve the build-up if due to the fence?

In the unlikely scenario of the sets of flow through fences not opening up due to build up of debris and hydrostatic forces of the flood waters, there could be a slight afflux increase in the upstream area, but this increase in afflux will likely occur inside the lease boundary causing no impact to owners of neighboring properties.

As shown on the attached figure, there is sufficient buffer between the fence and the lease boundary. In particular where the depth of flooding and discharge is higher as shown in Appendix H.

It is noted that during a significant flood event, site access will be limited due to the inundation of Orange Grove Road and mitigation of buildup along the fence during the event will be difficult. In order to mitigate these concerns, a monitoring program was proposed within the Water Management Plan, including routine inspections and inspections following significant storm / flooding events, to ensure that flow paths are clear of debris prior to the occurrence of a flood event.

September 20, 2020 Mr. Tim Baker, Senior Water Regulation Officer Page 2 of 2

Reference:

Gunnedah Solar Farm Draft Water Management Plan (WMP) - Phase 2 - Response to Comments - Reference Number

V17/8273#4

We trust this is sufficient to meet your needs at this time. Should you have any questions or comments, please do not hesitate to contact the undersigned.

Regards,

Stantec Australia Pty Ltd.

David Williams P. Eng. (Ontario, Canada)

Surface Water Team Lead Phone: 519 585 7320

David.Williams@stantec.com

Attachment: Gunnedah Solar Farm – Water Management Plan Post Approval Review

Figure from Appendix H – Fencing 1% AEP

Peter Bright; Bedilu Wolelo; Ian Harris; Derrick Rice C.

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ATTACHMENTS

Gunnedah Solar Farm – Water Management Plan Post Approval Review



Document: Water Management Plan Revision: Version 1 – 14 September 2020 Reviewed: Ben Harrison – 17 September 2020

Title of MP, Condition XX, Schedule XX	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
Condition 22 A) Design and construct the site perimeter fencing with drop down fencing as outlined in the figure in Appendix 4	P	The Secretary should have received correspondence agreeing to the change. Subject to adequate monitoring, the department does not object	Nil	
Prior to the commencement of construction, the Applicant must prepare a Water Management Plan for the development in consultation with Dol – L&W, and to the satisfaction of the Secretary. This plan must include:	Y		Nil	
detailed baseline data on hydrology across the downstream drainage system in the Carroll to Boggabri Floodplain;	Y		Nil	
detailed plans, including design objectives and performance criteria for the site perimeter security fencing;	Y		Nil	
a program to monitor and assess the impact of the development during flood events; reporting procedures for the results of the monitoring program; and a plan to respond to any exceedances of the performance criteria and mitigate and/or offset any adverse surface water impacts of the development.	Р	Further detail is required about what would happen in the event of fence monitoring in flood conditions showing a build-up of debris leading to increased upstream flooding? Are there actions that could be undertaken to relieve the build-up if due to the fence?	Further detail around what measures would occur in flood periods	
Other Agency Comments			Action Required	Company Response
Noted NRAR comments and revision to plan and response provided to NRAR			Nil	-

