

26 September 2022

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Dear Sir/madam

Water NSW Response to Draft SEARs for Gundry Solar Farm (SSD-48225958).

WaterNSW appreciates the opportunity to provide advice regarding the environmental assessment for the Gundry Solar Farm (SSD-48225958).

As the development is located within the Sydney Drinking Water Catchment, clauses 8.7 (1), 8.7(2) and 8.8(1) of the *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (the SEPP) apply.

WaterNSW has reviewed the Scoping Report prepared by Umwelt (Australia) Pty Ltd (dated September 2022). It is noted that Table 4.1 and Section 6.2.4.2 of the Scoping Report refers to carrying out a neutral and beneficial effect (NorBE) on water quality in accordance with the *Neutral or Beneficial Effect on Water Quality Assessment Guideline* (WaterNSW, 2021). The Assessment Guideline is aimed at local developments (not SSD) under Part 4 of the *Environmental Planning and Assessment Act* and would only give a broad description of what is required for a NorBE Assessment for this proposal.

As indicated in the Scoping Report the subsoils are very erodible so measures to limit the amount of water getting into the subsoil are required. It is recommended that the proponent's consultant contact WaterNSW before undertaking the assessment.

WaterNSW has reviewed the draft SEARs and requests that the following also be added:

- Regarding vegetation clearance and offsets: specific attention on measures to avoid and/or mitigate impacts to riparian zones and wetland vegetation.
- Details of any existing erosion control measures (including Catchment Protection Scheme (CPS) works), and any other constraints such as any existing erosion gullies and the location of sodic and saline soils. The impact of any proposed changes to existing CPS works or gullies due to the proposal and possible mitigation measures should be included.
- A Water Cycle Management Study (WCMS) detailing:
 - Site and Soil Evaluation for On-Site Wastewater Disposal if any on-site wastewater disposal is proposed, especially in the Construction Phase
 - How potential water quality impacts will be avoided and/or minimized through project design, and route and site selections for the hardstand areas (including that required for the proposed construction period)
 - Measures to limit the infiltration of water into highly erodible subsoils

- A layout including water quality design measures that will be employed to treat the increased runoff from the increased impervious area of the panels, internal access tracks and hardstand areas (Substation and Battery Energy Storage System) (eg buffers, swales, dams, wetlands, rehabilitation/fencing off)
- Stormwater quality modelling using MUSIC software showing a comparison of pre- and post-development scenarios on water quality parameters of key concern (Total Suspended Solids, Total Phosphorus and Total Nitrogen). WaterNSW will require an electronic copy of the MUSIC file in .sqz file, and
- Concept design plans of any stormwater quality treatment measures and required watercourse crossings (both temporary and permanent).

It is requested that WaterNSW be listed a stakeholder in any further consultation on the project. WaterNSW looks forward to reviewing the forthcoming EIS.

If you have any questions, please contact Jim Caddey via email at environmental.assessments@waternsw.com.au

Yours sincerely



DARYL GILCHRIST
Manager Catchment Protection