

OUT18/10034

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Dear Mr Davies

**Mulwala Solar Farm (SSD 9039)  
EIS Exhibition**

I refer to your email of 28 June 2018 to the Department of Industry (DoI) in respect to the above matter. Comment has been sought from relevant branches of Lands & Water and Department of Primary Industries. Any further referrals to Department of Industry can be sent by email to [landuse.enquiries@dpi.nsw.gov.au](mailto:landuse.enquiries@dpi.nsw.gov.au).

The department provides the following recommendations for consideration in assessment of the proposal. Further comments are provided at **Attachment A**.

**Recommendations Prior to Project Determination**

Water Supply Sources

- Confirm that a secure water supply is available for the project, including confirmation of which bores and dams are proposed to be used to supply water for the project and confirmation that they are appropriately licensed for the purpose.
- Where water supply works are to be accessed from landholders and/or local water authorities it is recommended confirmation be obtained of the ability to access these supplies prior to project determination.

Design and Construction

- It is recommended that the proponent clarifies how "Critical infrastructure (such as substation and ancillary infrastructure)" will be installed "300 millimetres minimum above natural surfaces". This is to confirm the disturbance required and the potential to influence flooding.
- Soil Capability Class should be confirmed across the site as the areas classified as Class 5 (Severe Limitations) may be Class 3 based on the current and historical use for irrigated agriculture. If the land is classified as Class 3 and suitable for irrigated agriculture, additional assessment is required to the impacts of the proposal on agriculture, including an assessment of alternative sites for the project to reduce or avoid the sterilisation of irrigated agricultural land resources.

## **Recommendations Post Project Approval**

### **Design and Construction**

- Prepare an Erosion and Sediment Control Plan (as part of a Construction Environmental Management Plan for the project).
- Where excavation will, or is expected to exceed the specified 1 metre depth below the ground surface further assessment of groundwater impacts and take requirements is undertaken.
- fencing associated with the proposed development be designed to reduce impacts on nuisance flooding and mitigation measures designed and implemented for on or off site impacts.

Yours sincerely



Alison Collaros  
A/Manager, Assessment Advice  
**Lands and Water - Strategy and Policy**  
31 July 2018

**Mulwala Solar Farm (SSD 9039)  
EIS Exhibition**

**Water Resources**

**Water Supply Sources**

There is uncertainty as to the sources of water supply and the current and required licensing for the project.

The EIS details a range of potential water sources to supply the 10ML construction water demands and the 0.5ML/year operational demands for the project, including existing groundwater bores, water tankers and temporary dams. The EIS also makes reference to six small ground tank dams located within the project area.

It is unclear if these are the 'temporary dams' referred to as potential water sources. Further information is required to confirm the proposed water sources and their licence status, and the impacts of extracting water from these water sources.

**Design and Construction**

An Erosion and Sediment Control Plan should be prepared. The EIS states that excavation depths of 1 metre will be required for excavation during the life of the project. Potential for groundwater impacts should be readdressed when final design plans and subsequent flood studies are completed.

**Agriculture Resources**

The EIS states that the "Land and Soil Capability Mapping for NSW on the SEED website (NSW Government, 2018) indicates the project area to be classified as having Class 5 - Severe limitations at the southern portion of the project area and Class 3 - Moderate limitations for the remainder of the project area".

Given that irrigated agriculture is currently occurring in what is suggested as being class 5 agricultural land and the fact that the area has a long history of cropping with extensive irrigation infrastructure present, it is likely the desktop analysis of the quality of the agricultural land is not accurate.

Based on its current and historical use, it is likely that the land is at least class 3 agricultural land as it fulfils the Land and Soil Capability Assessment Scheme criteria of being highly suitable for important agricultural industries at a local and regional scale.

Irrigated agricultural land is a scarce resource and the project location should avoid impacts to, or sterilisation of such land.

**END ATTACHMENT A**