

OUT17/49619

Mr Elle Donnelley
Resource & Energy Assessments
NSW Department of Planning and Environment

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Dear Ms Donnelley

**Wellington Solar Farm (SSD 8573)
EIS Exhibition**

I refer to your email of 13 December 2017 to the Department of Industry in respect to the above matter. Comment has been sought from relevant branches of Crown 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.

The department has reviewed the Environmental Impact Statement and provides the following comments and recommendations for consideration in assessment of the proposal. Detailed comments are provided in Attachment A.

Recommendations

Prior to project approval

- Construction water demands (potable and non-potable) should be revised and the security of the proposed sources and relevant licensing requirements and/or agreements be confirmed.
- Additional flood assessment should be completed to confirm the impacts of all infrastructure installation at the proposed development site on the flood characteristics and resulting erosion potential on and off site. Maps depicting the hydraulic characteristics pre and post development are requested to assist in interpretation of this issue.
- All works proposed within waterfront land (40m of the high bank of a watercourse) should be documented on a plan and the buffers should be consistent with the "Guidelines for Controlled Activities on Waterfront Land (DPI 2012)".
- A land assessment should be presented including:
 1. Review of existing information such as soil and land capability, soil landscape reviews and other available information.
 2. Explanation of slope and land characteristics.
 3. Soil survey that includes soil information that can be used to provide baseline data for final post project outcomes i.e. criteria for final rehabilitation outcomes, as well as construction limitations.
 4. Assessment of the impact on agricultural land. An aspect of this should include the displacement of agricultural enterprises, and/or the changes to agricultural enterprise pursuits to complement the solar farm operation.
 5. A commitment to the development of broad principles that include land quality and use outcomes to develop Rehabilitation and Decommissioning/Closure

Management Plans that outlines the rehabilitation objectives and strategies be done.

Post project approval

- The proponent should prepare a Construction Environmental Management Plan in consultation with DoI Water prior to commencement of activities.
- Works within waterfront land should be consistent with the [Guidelines for Controlled Activities on Waterfront Land](#) (DPI 2012).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'alison collaros'.

Alison Collaros
A/Manager, Assessment Advice
25 January 2018

Attachment A- Detailed Comments

Water supply

- The EIS indicates the non-potable construction water requirements to be 9000ML annually which seems an excessive amount of water for this type of project. The non-potable demands are proposed to be largely accessed from farm dams located on the property and where necessary Council stand pipes or other sources. There is no indication of the security of supply from the dams and whether the proposed extraction is consistent with any licensing requirements.

Flooding

- The flood assessment has modelled the existing flood affected area and depth and identified an area of high flood risk, however it has not assessed the impact on flood characteristics and erosion potential of installing all infrastructure, including roads. Additional assessment is required to address this issue.
- The flood assessment predicts an increase of 40mm to the depth of floodwater on adjacent land post development, however there is no representation of changes to the spatial extent or the velocity and erosion potential. Maps indicating pre and post development hydraulic characteristics would assist in addressing this.
- The proponent indicates that the perimeter fencing will be constructed so that it does not adversely affect the flow of floodwater and withstand floodwater or collapse in a controlled manner. The ability to achieve this will be critical to ensure the predicted impacts are not exceeded.

Works on waterfront land

- Reference is made in the EIS to maintaining a 40m buffer from waterways, however it appears from the available plans that roads and other infrastructure (including PV modules and cables) are proposed within the 40m buffer. Buffers should be consistent with the [Guidelines for Controlled Activities on Waterfront Land](#) (DPI 2012).

Land use impacts

- The EIS does not adequately address potential land use impacts resulting from the proposal. A series of recommendations are provided to improve the assessment.

End Attachment A