



## NSW RURAL FIRE SERVICE



The Secretary  
NSW Planning & Environment  
GPO Box 39  
Sydney NSW 2001

Your Ref: SSD 8643  
Our Ref: D18/386  
DA18012411516 AB

**ATTENTION:** Tim Stuckey

28 February 2018

**Agency Comment: Sapphire Solar Farm (SSD 8643) Environmental Impact Statement Exhibition;  
Gwydir Highway Kings Plains Inverell LGA**

Dear Mr Stuckey

I refer to NSW Planning and Environment correspondence dated 24 January 2018 seeking comment from the NSW Rural Fire Service (NSW RFS) regarding bush fire protection requirements for the above State Significant Development application.

The NSW RFS has received and reviewed the Environmental Assessment and understands the development proposal is for a "proposed 180 Megawatt (MW) photovoltaic (PV) solar farm" which includes:

- *Solar arrays: solar panels supported by a mounting system installed on piles driven, screwed, drilled and concreted or ballasted to the ground;*
- *Battery-based storage facilities;*
- *Power Conversion Units (PCU's) inclusive of Inverters/Rectifiers, Ring Main Units, LV/MV step-up*
- *Transformers located throughout the Proposed Development;*
- *Collector systems: above and/or below ground onsite cabling and electrical connections between the existing Substation and the respective PCU's;*
- *Operation and maintenance (O&M) building including workshop, warehouse, offices, ablutions, and carpark;*
- *Site access and onsite access tracks;*
- *Fencing and security system;*
- *Meteorological stations;*
- *Vegetation buffers (if required) for visual screening; and*
- *Firebreaks.*

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The subject land is part mapped bush fire prone land by Inverell Shire Council. Further, the NSW RFS is the primary response agency for all structural fires on the land.

The Environmental Impact Statement (EIS) does not adequately address the bush fire impacts of the proposed development. The EIS does not provide any relationship between the array/infrastructure sites and the bush fire prone land mapping or any relationship between the array/infrastructure sites and the landscape including vegetation. The EIS provides no detail off bush fire impacts or suitable bush fire protection measures. The constraints mapping does not include bush fire hazards.

The EIS shall be amended to show these relationships and provide suitable trafficable defensible space, based on vegetation communities and effective slope. Such calculations would identify flame length and radiant heat exposure around each array site and proposed defensible space. The EIS shall also identify the extent of proposed land management practices to achieve suitable separation distance between the identified bush fire hazard (including grasslands) and the proposed array/infrastructure sites.

The EIS shall provide a detailed plan of the internal road access network for fire fighting vehicles around each array/infrastructure site and between each array/infrastructure site. Further, the EIS shall provide detail for the location of water supplies for suitable fire fighting response to each array/infrastructure site.

For any queries regarding this correspondence please contact Alan Bawden on 1300 NSW RFS.

Yours Sincerely



John Ball

**Manager – Planning and Environment Service North**

*The RFS has made getting information easier. For general information on 'Planning for Bush Fire Protection, 2006', visit the RFS web page at [www.rfs.nsw.gov.au](http://www.rfs.nsw.gov.au) and search under 'Planning for Bush Fire Protection, 2006'.*