

OUT18/6457

Mr Tim Stuckey  
Resource and Energy Assessments  
NSW Department of Planning and Environment  
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**Gregadoo Solar Farm (SSD 8825)**  
**Comment on the Environmental Impact Statement**

I refer to the email of 19 April 2018 to the Department of Industry 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. Detailed comments are provided at **Attachment A**.

**Recommendations**

**Prior to project approval**

- It is recommended that the proponent assess the impacts of removing existing farm dams on aquatic habitat and existing drainage lines. A commitment is requested to reconstruct and stabilise the drainage lines where the impacts of dam removal are considered acceptable.
- It is recommended the proponent provide additional details and confirmation that a source of water has been secured for the construction and operation phases of the project. Where water is to be sourced from a new extraction point in the water source an impact assessment will be required. Confirmation is requested of the ability to obtain water entitlement if required.

**Post project approval**

- The proponent should prepare a Construction Environmental Management Plan (CEMP) prior to the commencement of activities, including:
  - indicators and standards to indicate successful rehabilitation of disturbed areas. These indicators and standards should be applied to rehabilitation activities once the solar farm is decommissioned;
  - a Soil and Water Management Plan and Erosion and Sediment Control Plan prepared in consultation with the Natural Resources Access Regulator (NRAR).

**Recommended conditions of consent**

- All underground infrastructure is to be removed during decommissioning.

Yours sincerely



Alex King  
**Director Cabinet and Legislation Services**  
1 June 2018

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**Agricultural resources**

- The department recommends that vegetation and weed control in the solar farm uses grazing as the control mechanism rather than herbicide application. This will maintain a vegetative cover over the soil surface and provide opportunities for local graziers to access an alternative food source.
- The department recommends the removal of all underground infrastructure following decommissioning of the site. This is considered important if the land is to be returned to cropping as outlined as a possibility in the EIS, as buried cables may become a nuisance during deep ripping following decommissioning and future cultivation.
- The department supports the separation of subsoil from top soil and the use of gypsum to manage sodic soils as outlined in table 7.3 of the EIS. This is of major concern for cable trenches as they could become sites of major erosion as evidenced by the severe gully erosion on the site.

**Water resources**

- A number of watercourses exist on the site. Where works are proposed within waterfront land of the 1st and 2nd order watercourses and of Boiling Down Creek, the works and buffer requirements should be consistent with the [Guidelines for Controlled Activities on Waterfront Land](#) (2012).
- The proponent has indicated that there are six existing farm dams on the development site that will be dewatered and backfilled prior to construction. These dams exist along unnamed drainage lines. Dams will be dewatered then backfilled and the water used for construction. There has been no assessment of the impacts of removing these dams on aquatic habitats. Rehabilitation of dams will be needed to ensure adequate reconstruction and stabilisation of the existing drainage channel.
- The proponent has indicated that it is in the process of assessing options for sourcing water during construction and operation, and has provided an estimate of water needs during both phases. No water source has been specifically identified nor confirmation that a deal has been secured.
- The proponent has identified that a high potential Groundwater Dependent Ecosystem exists in the north eastern corner of the site, outside of the development area. The proponent has recognised there is low to moderate potential for groundwater interaction at the development site. The area is not listed as groundwater vulnerable and it is unlikely that groundwater will be extracted during construction and operation. Pollution and contamination prevention and mitigation measures are identified by the proponent and the department supports their incorporation into the Construction and Environmental Management Plan as well as the subsequent operation of the proposed development.
- The department supports the safeguards and mitigation measures proposed through the creation of a Soil and Water Management Plan and an Erosion and Sediment Control plan proposed through the development of a Construction Environmental Management Plan



(CEMP) as well as the safety and mitigation measures proposed during operation and decommissioning. The department supports the use of Landcom (2004) to guide the development of these plans.

**END ATTACHMENT A**