



Department of Primary Industries

OUT16/17127

Ms Rose-Anne Hawkeswood
Resource Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Rose-Anne.Hawkeswood@planning.nsw.gov.au

Dear Ms Hawkeswood

White Rock Solar Farm Project (SSD 7487) Comment on the Environmental Impact Statement

I refer to your email dated 18 March 2016 to the Department of Primary Industries in respect to the above matter. Comment has been sought from DPI Water, Fisheries, Lands & Natural Resources, and Agriculture. DPI Fisheries have no issues. DPI Water, Lands & Natural Resources and DPI Agriculture comments are as follows. Any further referrals to DPI can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

DPI notes that there are no major outstanding issues that should delay determination, however provides comments and some queries as follows.

Comment by DPI Water

DPI Water has reviewed the Environmental Impact Statement (EIS) for White Rock Solar Farm. Our comments are outlined as follows.

Water Supply

The EIS outlines water will be required for dust suppression on unsealed roads during construction and for cleaning panels during operations. The EIS outlines the volume of water required during construction would vary depending on temperature and rainfall, but would be minimal during operations. The EIS outlines water required during construction could be sourced from farm dams on site or neighbouring properties subject to landholder agreement. Water used during operations will be sourced from rainwater tanks or offsite.

DPI Water recommends the proponent ensures they have an adequate, reliable and legally sourced water supply prior to the development commencing. Recently, developments located in this area have had a number of issues sourcing an adequate and reliable water supply. The proponent should source water or obtain relevant licences as soon as practical.

Any water sourced from landholders' farm dams should be in accordance with the Harvestable Rights Order published in the NSW Government Gazette 40 dated 31 March 2006. More information on Harvestable Rights can be located at the following link. <http://www.water.nsw.gov.au/water-licensing/basic-water-rights/harvesting-runoff>

Watercourse Management

The EIS outlines that there is a shallow ephemeral drainage depression traversing the site which drains in a north-easterly direction into Wellingrove Creek, a tributary of the Severn River. The EIS outlines the banks are vegetated and stable with no signs of erosion. The EIS also outlines there are no definable channel banks or a channel bed. The EIS outlines the drainage depression varies in width and is up to 45 metres wide in some sections and runs for a distance of 800 metres through the development site.

The EIS outlines DPI Water was consulted in 2011/2012 regarding the north-east drainage lines across the site. The advice sought was whether these drainage depressions were a 'river' as defined under the *Water Management Act 2000* and whether a Controlled Activity Approval was required to undertake any works within 40 metres of a watercourse.

The definition of a river under the *Water Management Act 2000* is:

- (a) any watercourse, whether perennial or intermittent and whether comprising a natural channel or a natural channel artificially improved, and
- (b) any tributary, branch or other watercourse into or from which a watercourse referred to in paragraph (a) flows, and
- (c) anything declared by the regulations to be a river, whether or not it also forms part of a lake or estuary, but does not include anything declared by the regulations not to be a river.

Aerial photograph imagery of the site shows well defined drainage lines located on the site. Whilst advice was given in relation to whether a controlled activity approval is required for works within 40 metres of the high bank of the watercourse, it is considered the drainage line on site meets the definition of a 'river' as defined under the *Water Management Act 2000*.

Whilst developments approved as State Significant Development are exempt from the requirement to obtain a Controlled Activity Approval under the *Water Management Act 2000* all works should be undertaken in accordance with the Department of Primary Industries' *Guidelines for Controlled Activities on Waterfront Land*.

It appears that Figure 9.3 in the EIS shows the solar array located across and within the drainage line on the site. The EIS does not adequately explain how the watercourse will be managed. It is unclear if the proponent proposes to realign the watercourse or fill the watercourse or divert the watercourse around the site. Further information needs to be supplied, including cross sectional and long sectional profiles of the watercourse, by the proponent to enable DPI Water to provide accurate comments on this issue and to determine whether the works proposed are in accordance with the Guidelines.

For further information please contact Christie Jackson, Water Regulation Officer, (02) 6763 1426, christie.jackson@dpi.nsw.gov.au.

Comment by DPI Lands & Natural Resources

DPI Lands & Natural Resources notes that the project includes Crown Land, and confirms that landholder's consent has been issued.

Ongoing liaison will be required to ensure appropriate licensing for areas of Crown Land involved.

For further information please contact Scott Stanton, Group Leader (Tamworth), (02) 6763 3021, scott.stanton@crownland.nsw.gov.au.

Comment by DPI Agriculture

DPI Agriculture has reviewed the exhibited Environmental Impact Statement for the Griffith Solar Farm against the SEARs and the Primefact "Infrastructure Proposals on Rural Land".


The EIS states that upon decommissioning of the solar farm, the site would require rehabilitation to restore it to its pre-existing agricultural condition. DPI Agriculture requests that further information on:

- What processes would be used to measure the baseline (pre-existing) condition of the land; and
- What monitoring programs will be used to measure the return of the land back to its pre-existing condition.

A draft Decommissioning/Rehabilitation Plan should be developed outlining these activities.

For further information please contact Helen Squires, A/Manager Agriculture Landuse Planning, (02) 4939 8962, helen.squires@dpi.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M Isaacs', with a stylized flourish at the end.

Mitchell Isaacs
Director, Planning Policy & Assessment Advice
27/4/2016