

OUT18/10896

Natasha Homsey Environmental Assessment Officer Resource & Energy Assessments NSW Department of Planning and Environment

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Dear Ms Homsey

Springdale Solar Farm (SSD 8703) EIS Exhibition

I refer to your email of 13 July 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 <u>landuse.enquiries@dpi.nsw.gov.au</u>.

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

Recommendations Prior to Project Approval

- The EIS should be updated to correct stream order listings and riparian buffer widths for Back Creek and the Central Tributary.
- Details of a viable source of water that is to be trucked onto the site for use over the life of the project, including project decommissioning, should be identified in the EIS.
- The EIS should assess the impacts on crown lands and crown roads directly affected by, or adjacent to the proposed development area as identified in **Attachment A**.
- The detailed design plans should confirm excavation depths of all earthworks, and include of any proposed construction plans for drainage features and scour protection. Potential for groundwater impacts should be readdressed when final design plans are completed.

Recommended Conditions of Approval

- Aa Soil and Water Management Plan should be prepared prior to commencement of construction activities at the site.
- The design and construction of any watercourse crossings on the site should be undertaken in accordance with the Department's Policy and Guidelines for Fish Friendly Waterway Crossings (2004) and Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004). These documents are available at https://www.dpi.nsw.gov.au/fishing/habitat/publications/pubs.
- Proposed plans and construction methodologies for all waterway crossings over key fish habitat (3rd order or above waterways) should be designed in consultation with DPI Fisheries.

- Infrastructure (including security fencing) should be located outside the vegetated buffer zones (apart from infrastructure such as road crossings).
- Works within waterfront land must be carried out in accordance with the *Guidelines for Controlled Activities on Waterfront Land* (Natural Resources Access Regulator 2018).
- Relevant licences and consents must be obtained from Dol Lands prior to accessing or undertaking any activity on crown land.
- All Crown public roads within the development envelope should be closed and purchased by Yass Valley Council.
- All below-ground infrastructure should be removed when the project is decommissioned.
- A Site Rehabilitation plan should be developed at least two years prior to decommissioning and include standards to show successful rehabilitation and rehabilitation methods.

Yours sincerely

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Alison Collaros A/Manager, Assessment Advice Lands and Water - Strategy and Policy 14 August 2018

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Water Resources

Watercourses

- Lands and Water databases indicate Back Creek and the central Tributary on the project site are 4th order and 3rd order watercourses respectively. Table 25 on p 105 of the EIS Report and Figure 22 should be corrected to reflect this and the relevant vegetated buffers be applied.
- A number of first order watercourses are located within the solar panel array footprint. The riparian value of these is recognised to be limited, however it is recognised based on the flood modelling that flows will be conveyed via these watercourses. Management of vegetated buffers and of these flow lines should focus on retaining adequate vegetation cover to mitigate erosion.
- It is understood the project requires the crossing of watercourses for road crossings and cable installation. The locations and potential impacts of installing and operating this infrastructure should be detailed in the EIS.
- The infrastructure is proposed to be located outside of the 1 in 100yr flood event of the two main watercourses, or at ground level if within. The risk of impacts by flooding on and off the site is considered low.

Water Requirements

• In order for Lands and Water to provide a complete assessment of all water issues the proponent must detail water requirements and access for the entire duration of the project, including decommissioning requirements. The water requirements are minor, indicated as 2ML during construction and 1.6ML/yr for operations.

Agriculture

- The beneficial use of the land through the use of sheep grazing to maintain ground cover and control of weeds in the area of the solar farm is supported. There will need to be adequate provision of watering points and shelter provision in the resulting paddocks to accommodate the sheep.
- Removal of all underground infrastructure following decommissioning of the site is recommended to avoid nuisance interference during cultivation activities.
- A Construction Environment Management Plan (CEMP) should be developed and include indicators and standards to measure successful rehabilitation of disturbed areas. These indicators and standards should also be applied to rehabilitation activities once the solar farm is decommissioned.

Crown Lands

- Infrastructure located on Crown roads subject to a Crown lands licence application, including underground infrastructure, should be removed during demobilisation and rehabilitation.
- Road works on the internal road section that coincides with the Crown road within Lot 54 DP 754908 should be confined to minor road works with no waterway crossing structures.
- Figure 3 Springdale Solar Farm development envelope shows the proposed Tintinhull Road realignment as a site access. If the access is continued along the Crown road section of Tintinhull Road and if works are required on the Crown section of Tintinhull Road then it should be transferred to Yass Valley Council under the Administration of Crown Roads

policy. The proponent should clarify if access is to be along the new proposed road route or directly into Lot 202 DP 754908 from the point shown as Site Access 3 in the EIS.

• It is noted that as part of the licence assessment process the proponent has recently decided to not install any waterway crossing structures on the Crown roads. This should be reflected in the Environmental Impact Statement.

END ATTACHMENT A