

OUT18/6591

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Resource and Energy Assessments
NSW Department of Planning and Environment

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Gunnedah Solar Farm (SSD 8658)
Comment on the Environmental Impact Statement

I refer to the email of 20 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.

The department provides the following recommendations and comments for consideration in assessment of the proposal.

Recommendations

Prior to project approval

- The proponent should revise the Land Use Conflict Risk Assessment (LUCRA) to consider potential impacts from surrounding land use on solar farm operations.
- Additional flood modelling should be provided which includes the inputs of both the Mooki River and the Namoi River to ensure impacts are consistent with the requirements of the Carroll to Boggabri Floodplain Management Plan (FMP), including ensuring the maximum increase in velocity is within the criteria of the FMP. This may require modifications to the infrastructure.

Post project approval

Recommended conditions of consent

- All underground infrastructure is to be removed during decommissioning.
- The proponent prepares a Soil and Water Management Plan as part of the Construction Environmental Management Plan in consultation with NRAR, prior to commencement of activities.

Comments

Agricultural resources

- The LUCRA assessment does not address the potential impacts to the operation from existing routine farming activities which may result in lost energy production, for example from dust deposition on panels as a result of neighbouring farming activity. The proponent should address the Right to Farm policy which supports rural landholders to be able to undertake lawful agricultural practices without conflict or interference arising from complaints from neighbours and other land users, including the proponent. Such conflict or interference may have the potential to sterilise a larger footprint of highly productive Biophysical Strategic Agricultural Land (BSAL) over and above the project area.

- The department commends the commitment by the proponent to remove all below ground infrastructure and considers this position should be enforced as a condition of consent.

Flooding

- The proponent indicates that the perimeter fencing will be constructed during the construction phase. The proposed security fences create a hindrance to flow as it is distributed through the site. The ability to construct this fence so that it does not adversely affect the direction of flow of floodwater will be critical to ensure the predicted impacts are not exceeded.
- Interpretation of the 1% AEP Flood velocity existing scenario map and configuration 3 scenario map indicates an increase in flood velocity along the western side of the solar farm. The EIS states within laneways around solar panel infrastructure there is an increase in velocity from 1.5 m/s to 3.3 m/s where they overtop and cross over the fence. This is more than a maximum of 50% increase for velocities as per the complying works criteria stated in the Carroll to Boggabri Floodplain Management Plan (FMP). Further modelling is recommended around flood velocities and/or infrastructure modification to ensure that the proposal aligns with the complying works criteria under the FMP, including ensuring the predicted increased flood levels on adjacent landholders properties is less than 100mm and that drainage is to be within 24 hours of natural/existing drainage time.
- The EIS has recommended further detailed design to address flood impacts with the inclusion of flood modelling impacts (splitting inflows) of the Mooki River (tributary of the Namoi River) as well as the Namoi River. The department recommends any mitigating measure to obstruct or divert flood water be assessed before project approval, to ensure impacts are adequately assessed and considered as a part of the project approval, within the requirements of maximum impacts on adjacent properties under the Carroll to Boggabri FMP works criteria.

Yours sincerely



Alison Collaros
A/Manager, Assessment Advice
29 May 2018