



OUT20/13335

Rob Beckett  
Planning & Assessment  
NSW Department of Planning, Industry and Environment

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Dear Mr Beckett

**Glenellen Solar Farm (SSD-9550)  
EIS**

I refer to your email of 28 October 2020 to the Department of Planning, Industry and Environment (DPIE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

The following recommendations are provided by NRAR.

**Pre- Approval Recommendations**

**Water Supply and Licencing**

The proponent should:

- Provide clarification and details of the ability to obtain the necessary water volumes from the site or confirm a viable supply is available for the supply via an agreement from a water supplier. Where the water is to be sourced from a currently unauthorised source, an impact assessment and confirmation that the necessary entitlement can be obtained will be required.
- Confirm the potable and non-potable water demands and water sources for the operational period.

**Explanation / Comment**

The water demands for the construction phase have been estimated however no estimate is provided for the operational phase.

Insufficient information has been provided to understand the proposed use of the existing on-site dams, the calculations to determine harvestable rights or evidence that onsite water supplies may be adequate for the proposed project. Neither are there any confirmed agreements from third party providers or water access licence information included in the EIS.

**Controlled Activities on Waterfront Land**

The proponent should:

- Provide further justification where buffer widths to watercourses are proposed to differ from the requirements in the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018).

**Explanation / Comment**

The proponent commits to installing cables across Kilnacraft Creek in accordance with the Guidelines for Controlled Activities on Waterfront Land (2018). However, the guidelines are not referenced in relation to any other proposed or potential works on waterfront land such as creek crossings, culverts or other infrastructure.

Insufficient justification has been provided to confirm that mapped first and second order watercourses should not be considered waterfront land.



Insufficient information has been provided to support the proposed use of buffer widths to watercourses which are inconsistent with the Guidelines for Controlled Activities on Waterfront Land. Further justification and supporting evidence such as photos and site descriptions are needed.

**Post Approval Recommendations**

- The proponent should obtain relevant approvals and licences under the *Water Management Act 2000* before commencing any works which intercept or extract groundwater or surface water (including from on-site dams where necessary) or for any works which have the potential to alter the flow of floodwaters.
- The proponent should prepare a Construction and Operational Environmental Management Plan (incorporating an Erosion and Sediment Control Plan) prior to commencement of activities.
- Works within waterfront land should be in accordance with the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018).

Any further referrals to DPIE Water and NRAR can be sent by email to:  
[landuse.enquiries@dpie.nsw.gov.au](mailto:landuse.enquiries@dpie.nsw.gov.au).

Yours sincerely

Simon Francis  
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**Water – Strategic Relations**  
30 November 2020