

NEW ENGLAND SOLAR FARM

Water Supply Strategy

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This Strategy has been prepared by Onward Consulting in accordance with the brief provided by UPC/AC Renewables and has relied upon the Project information available at the time of writing and all findings, conclusions or recommendations contained in the report are based thereon. The report is for the use of UPC/AC Renewables and no responsibility will be taken for its use by other parties. UPC/AC Renewables may, at its discretion, use the report to inform regulators and the public.





Acronyms and Abbreviations

Acronym	Description
CoC	Conditions of consent of SSD 9255
Council	Uralla Shire Council
DA	development application
DPIE	NSW Department of Planning, Industry and Environment
EIS	The Environmental Impact Statement for the NESF dated February 2019, the Amendment Report date June 2019, the Response to Submissions dated June 2019, additional information dated 31 October 2019 and 10 December 2019, the subdivision plan in Appendix 3 of SSD 9255 and the additional information provided to the Independent Planning Commission of NSW on 7 and 18 February 2020
EPA	NSW Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979 (NSW)
GLC	Green Light Contractors Pty Ltd
kL	kilolitre
kL/day	kilolitre per day
IPC	Independent Planning Commission
km	kilometre
ML	megalitre
ML/yr	megalitre per year
MW	megawatt
MWh	megawatt hour
NESF	New England Solar Farm
RTS	Response to Submissions report (June 2019)
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
SSD	State significant development
UPC	UPC/AC Renewables Australia Pty Ltd
WAL	water access licence
WM Act	Water Management Act 2000
WSW	water supply works





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1. Introduction

1.1 New England Solar Farm

On 9 March 2020, UPC/AC Renewables Australia Pty Ltd (**UPC**) obtained development consent to construct and operate the New England Solar Farm (hereafter referred to as the **NESF** or **the Project**), a grid-connected 720 megawatt (MW) AC solar farm with battery storage and supporting infrastructure. The NESF is located approximately 6 kilometres (km) east of Uralla and approximately 8.6 km south of Armidale, in the New England region of New South Wales (NSW).

Based on preliminary designs the Project will involve:

- a central and northern array of photovoltaic panels (PV) modules with indicative capacities of 400 and 320 MW AC respectively¹;
- a 200 MW/400 MW hour (MWh) battery energy storage system (BESS);
- inverters, an underground cable network and electrical connection infrastructure between the two array areas;
- a grid substation to connect the Project to TransGrid's electricity transmission network;
- an access road from the local road network and internal access tracks;
- site office compound and temporary laydown areas;
- a new internal road network to enable access from surrounding local roads to the array areas during construction and operations;
- operations and maintenance (O&M) infrastructure, including O&M buildings, meeting facilities, a temperature-controlled spare parts storage facility, supervisory control and data acquisition (SCADA) facilities, a workshop and associated infrastructure (eg kitchen, toilets and other facilities);
- car parking facilities; and
- stock-proof security fencing and creek crossings.

The NESF site (**the Site**), which spans approximately 2,000 hectares (**ha**) of previously cleared grazing land, is located in a rural area with the nearest non-associated residence located about 450 m at its closest point. All other non-associated residences are located at least 1 km away. The NESF is located in close proximity to the New England Highway and the Main Northern Railway and has direct access to the electricity network via TransGrid transmission lines which passes through the Site. The Project in its regional context is presented in Figure 1.1. The proposed layout of the NESF, subject to final design, is presented in Figure 1.2. Further details of the Project are described in the Environmental Impact Statement (EIS²)

¹ The total capacity allocation may change during detailed design based on a number of factors, including geotechnical conditions, medium voltage cable reticulation and inverter placement and technological advances (e.g. improvements to the efficiency of photovoltaic (PV) modules)

² The EIS is defined in the SSD 9255 development consent as the NESF EIS dated February 2019, the Amendment Report date June 2019, the Response to Submissions dated June 2019, additional information dated 31 October 2019 and 10 December 2019, the subdivision plan in Appendix 3 of SSD 9255 and the additional information provided to the Independent Planning Commission of NSW on 7 and 18 February 2020





1.2 Approval pathway

The Project is a State significant development (**SSD**) under the *Environmental Planning and* Assessment Act 1979 (NSW) (EP&A Act) and the State Environmental Planning Policy (State and Regional Development) 2011 (**SRD SEPP**).

The Project was subject to the SSD assessment and approval provisions of the EP&A Act and a development application (**DA**) and environmental impact statement (**EIS**) were submitted for assessment. The EIS was publicly exhibited from 20 February to 20 March 2019.

A number of submissions from the public, government agencies and other organisations were received by the NSW Department of Planning and Environment (now the NSW Department of Planning, Industry and Environment (**DPIE**)) following the public exhibition of the EIS. A Response to Submissions report (**RTS**) was submitted to the DPIE in June 2019, addressing the matters raised in the submissions provided during the EIS exhibition period.

As a result of further discussions with the local community, landholders and other stakeholders, UPC made a number of amendments and refinements to the proposal that was the subject of the EIS, including the removal of a southern array and the Construction Accommodation Village. An Amendment Report, prepared and submitted to the DPIE in June 2019 in conjunction with the RTS, summarised the changes made since the EIS exhibition and the impacts associated with the amended Project. Following the submission of the RTS and Amendment Report, UPC continued consultation with DPIE, NSW Roads and Maritime Services (now Transport for NSW) and Uralla Shire Council in relation to a number of issues. Consolidated responses to DPIE's requests for additional information, including updated Project figures, were submitted in October and December 2019 to the DPIE in the form of memoranda.

The DPIE undertook a comprehensive assessment of the merits of the Project and considered all potential issues in accordance with the requirements of the EP&A Act. Under Section 4.5(a) of the EP&A Act and clause 8A of the SRD SEPP, the DPIE referred the Project to the Independent Planning Commission (**IPC**) on 19 December 2019. The IPC granted development consent SSD 9255 for the Project on 9 March 2020.

The Project has been approved to be developed subject to conditions of consent for SSD 9255 (CoC) as issued by the IPC. These conditions are required to:

- prevent, minimise and /or offset adverse environmental conditions;
- set standards and performance measure for acceptable environmental performance;
- require regular monitoring and reporting; and
- provide for the ongoing environmental management of the Project.

Schedule 3 CoC 20 requires UPC to demonstrate it has sufficient water for all stages of the Project.







Figure 1.1 - Location of the New England Solar Farm

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Figure 1.2 - Proposed New England Solar Farm layout

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1.3 Purpose of this document

The EIS³ described the following potential water supply options for the Project:

- potable water imported (trucked in) to site;
- opportunistic use of water from farm dams to be removed in accordance with harvestable rights provisions;
- provision from a third party (e.g. AEE Services);
- treated water from Uralla's sewerage treatment plant; and
- potable water from Uralla's town water supply.

General statements in the EIS in relation to water supply included:

- water supply arrangements for the Project will be the subject of further consultation with the Project landholders, neighbouring landholders, Uralla Shire Council and relevant agencies; and
- UPC and its lead contractor will continue discussions with AEE Services, Uralla Shire Council and other providers prior to the commencement of construction.

At the time the IPC granted development consent, UPC had not secured a definitive water supply option. Therefore, Schedule 3 CoC 20 of the Development Consent requires the following:

Prior to the commencement of the development, the Applicant must demonstrate to the satisfaction of the Secretary that the Applicant has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.

This Water Supply Strategy (the **Strategy**) describes the water supply options identified by UPC for all stages of the Project.

³ The EIS is defined in the SSD 9255 development consent as the NESF EIS dated February 2019, the Amendment Report date June 2019, the Response to Submissions dated June 2019, additional information dated 31 October 2019 and 10 December 2019, the subdivision plan in Appendix 3 of SSD 9255 and the additional information provided to the Independent Planning Commission of NSW on 7 and 18 February 2020





2. Water demand

Water for construction of the Project is primarily required for dust suppression, with other minor uses including potable water for site amenities, fire protection and for cleaning of plant and equipment. Water supply for operation is primarily required for the cleaning of solar panels.

The EIS estimated the average water demand for construction would be in the order of 200 kilolitre per day (kL/day), with a total water use of approximately 220 megalitre (ML) for the duration of construction. Water demand for Project operations were estimated to be approximately 5 ML per year (ML/year).

Recent detailed design has confirmed the following estimated construction water demand:

- daily construction average water demand: 200 kL/day;
- total construction water demand: 220 ML;
- operational water demand: 5 ML/year; and
- potable water demand: 4 kL/day during construction and 0.5 kL/day during operation.





3. Water supply strategy

UPC and its Engineering, Procurement and Construction contractor, Green Light Contractors (GLC), have undertaken an extensive evaluation of water supply options in the Project area with the objectives to:

- identify a range of options to secure water supply throughout construction and operation of the Project to provide flexibility if one option becomes unavailable (temporarily or permanently);
- minimise environmental impacts, in particular impacts on the local community (e.g. truck movements through Uralla, dust, noise); and
- maintain Project economic viability.

Table 3.1 provides a summary of the water supply options identified to date. The Broombee Stud dam is the preferred and primary construction and operational water supply option for the following reasons:

- the dam has an existing water access licence (WAL) and water supply works (WSW) approval for a by-wash dam, pump and irrigation;
- the landholder has adequate surplus water for all stages of the Project;
- GLC and the landholder have entered into an agreement in principle for use of the water;
- the environmental impacts including traffic, air quality and noise would be significantly less than the options described in the EIS;
- a significant reduction in water transport costs; and
- reduced reliance on potentially limited potable water sources from Uralla, Walcha, and surroundings.

Water from the Uralla Shire Council sewage treatment plant (STP) would be used in parallel to Broombee Stud dam where more efficient (e.g. road works close to Uralla).

Water in the dams within the development footprint would be used progressively as they are filled in as construction progresses.

Potable water would be sourced from Uralla Shire Council or Walcha Shire Council mains water supply.

Sections 3.1 to 3.5 provide further details of each option and an environmental impact assessment of each option in comparison to that described in the EIS.





Table 3.1 - Water supply options

Water source	Description	Available supply	Hierarchy
Broombee Stud - private property	Dam on private property	Total water access licence is 843.5 ML	Primary construction water source Potential operational water source.
Uralla Shire Council sewerage treatment plant	Treated wastewater	150 kL/day and total capacity of 400 ML.	Supplementary primary construction and operational water source if Broombee Stud dam becomes unavailable.
Dams within project development footprint	Dams on private property	Estimated 10 dams with average 0.5 ML each	Supplementary construction and operational water source.
Uralla and Walcha Shire Councils water main	Town Water Supply	Adequate for potable uses	Construction and operational potable water

3.1 Broombee Stud dam

3.1.1 Description of water supply

The Broombee Stud dam is located on a property immediately adjacent to the Project (Figure 3.1). The landholder has a current WAL and WSW approval, which are detailed in Table 3.2. Water would be provided to the Project by the landholder of Broombee Stud dam via a private commercial agreement with UPC.

Table 3.2 - Broombee Stud dam licence details

Approval	Details
WAL 39699	Water sharing plan: Macleay River Unregulated and Alluvial Water Sources Category: Unregulated River Status: Current Water Source: Salisbury Waters Water Source Tenure type: Continuing Share components: 838.00 Nominated works approval: 30CA308873
WAL 39702	Water sharing plan: Macleay River Unregulated and Alluvial Water Sources Category: Domestic and stock Status: Current Water Source: Salisbury Waters Water Source Tenure type: Specific purpose Share components: 5.50 Nominated works approval: 30CA308873
Water Supply Works and Water Use	Issue date: 1 July 2016 Expiry date: 30 June 2029 Approval number: 30CA308873 Status: Current Water Source: Salisbury Waters Water Source WALs nominating these works: WAL 39699 and WAL 39702 Work type/s: - Diversion Works – Pumps, 200mm Centrifugal Pump - Storages - Bywash Dam, Use: Irrigation





The landholder of Broombee Stud has advised that water may be accessed from the dam so as long as it maintains a minimum of 50 % capacity, which will adequately supply daily peak and total construction water demand and operational requirements. At the time of preparing this Strategy, the Broombee Stud dam was at full capacity (approximately 843.5 ML) and it is expected that it would remain above 50 % capacity for the entirety of the Project construction period.

Water from Broombee Stud dam is proposed to be accessed via a pump and pipeline supplied by the landholder of Broombee Stud. The pump and pipeline will connect to a water storage tank and standpipe located within the Project development footprint, which will be constructed by the Proponent.

The proposed location of the water supply infrastructure is shown on Figure 3.1. Infrastructure supplied by the landholder will include:

- two solar submersible pumps with a maximum flow rate of approximately 30 m³/hour each;
- shared solar array for pump power supply;
- water meter on each pump to monitor water consumption; and
- 110 mm poly pipe approximately 1.2 km long placed overland for transfer of water to the Project development footprint.

Infrastructure proposed to be installed by UPC will include:

- a connecting pipeline (110 mm poly pipe) placed overland from the Broombee Stud landholders pipeline to water storage tanks;
- up to five approximately 34,000 L capacity water storage tanks with approximate dimensions of 4,180 mm diameter and 3,050 mm high connected to a standpipe for filling water trucks; and
- access track and water loading area.

The disturbance footprint for the water storage tank would be approximately 200 m^2 and fully within the development footprint assessed in the EIS.

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Figure 3.1 - Proposed water supply infrastructure and access for Broombee Stud dam

3.1.2 Environmental impact assessment and licencing requirements

The following provides a description of the licencing requirements and potential environmental impacts for use of the Broombee Stud dam.

3.1.2.1 Approval and licencing requirements

UPC would obtain the water from Broombee Stud dam under a private commercial agreement with the landowner, and therefore would not require its own WAL or WSW approval. The existing WSW approval would be amended by the landholder to include the two additional pumps. Water NSW and the Natural Resources Access Regulator (NRAR) have confirmed that the water use of 'Irrigation' is appropriate for the purposes proposed for the Project.

The proposed pipeline from the Broombee Stud dam to the Project will be installed by the landholder and would traverse private land owned by Broombee Stud. Therefore, the pipeline is considered to be exempt from approval under the *Water Management Act 2000* (WM Act) via subdivision 3 section 37 which states the following in relation to pipe work (emphasis added):

37 Exemptions relating only to construction of water supply works

(1) A person is exempt from section 91B(1) of the Act in relation to the construction of any of the following water supply works—

(b) the construction of a water pipe for use solely for conveying water from one place to another,

No further assessment or approval under the EP&A Act is considered to be required for the infrastructure located on the Broombee Stud property.

The infrastructure requirements for the Project were described in detail and are summarised in Section 1.1 of this Strategy. Permanent infrastructure described in the EIS includes the solar arrays, BESS, underground cable network and electrical connections, O&M infrastructure and internal road network. Construction infrastructure described in the EIS includes offices, workshops, and laydown areas.

While water supply infrastructure proposed for the Project site (i.e. overland pipeline, storage tanks and standpipe) for construction purposes were not specifically described in the EIS, it is considered that this infrastructure does not require development consent for the following reasons:

- ground disturbance for installation of the water supply infrastructure will be located within the assessed Project development footprint;
- the activities required to install the water supply infrastructure (i.e. clearing, creation of access tracks, use of heavy machinery) were described in the EIS;
- access to the water storage tanks would be on internal roads constructed as part of the Project which were described in the EIS;
- use of water carts for dust suppression and use of water for cleaning photovoltaic panels were described in the EIS;
- water storage could reasonably be assumed to be 'associated infrastructure' during construction of a large-scale solar farm; and
- the net environmental impact would be reduced as a result of sourcing water via a pipeline and storage within onsite tanks (see further detail below).

3.1.2.2 Environmental impact assessment

The use of Broombee Stud dam as the main water supply source for the Project would have a net environmental benefit to the proposed water supply described in the EIS (i.e. trucking water to site). Piping water from the adjacent Broombee Stud dam would reduce heavy vehicle movements within Uralla and the associated noise and air quality impacts to nearby residents.

Notwithstanding, the potential environmental impacts from construction and operation of the water supply infrastructure are provided in Table 3.3 and relevant environmental matters (vegetation communities, Aboriginal and historic heritage items, sensitive receptors and watercourses) are shown on Figure 3.1. The assessment includes the infrastructure being installed by the Proponent only as no further assessment or approval under the EP&A Act is considered to be required for the infrastructure located on the Broombee Stud property as described above.

Table 3.3 - Environmental impact assessment of the water supply infrastructure

Category	Impact assessment
Biodiversity	The EIS assessed potential impacts from the construction and operation of the Project on biodiversity within a proposed 'development footprint' (Figure 3.1). The EIS assumed that all land within the development footprint would be disturbed as part of the Project. The proposed water supply infrastructure being constructed by the Proponent is within the development footprint and therefore the ground disturbance associated with the installation of water supply infrastructure was assessed within the EIS, and biodiversity development assessment report (BDAR). The new proposed pipeline, tank and standpipe would be located within the area assessed as the development footprint in the EIS, which is identified as Plant Community Type (PCT) 510 (Pasture). PCT510 (Pasture) does not require offsets due to its highly disturbed and degraded condition under Section 10.3.2.2 of the Biodiversity Assessment Method (OEH 2017).
Surface water	The pipeline, storage tanks and standpipe would not be located in any watercourses and therefore would have negligible impacts on surface water flow. The water from Broombee Stud dam would be obtained in compliance with the requirements of the existing WAL and WSW (when amended) and therefore would not have any additional impacts on surface water resources.
Groundwater	The water source is surface water run-off and the pipeline would be placed on the surface rather than buried. Therefore, no groundwater impacts are anticipated.
Aboriginal cultural heritage	Thirty-seven Aboriginal cultural heritage sites were described in the EIS as being impacted within the Project development footprint. The proposed water supply infrastructure would traverse land that was surveyed for Aboriginal cultural heritage as part of the EIS, and therefore no additional impacts on Aboriginal cultural heritage is anticipated. Works to install the water supply infrastructure would be undertaken in accordance with the Aboriginal Cultural Heritage Management Plan.
Historic heritage	The historic heritage assessment identified relics and significant structures within the Project development footprint. The proposed water supply infrastructure would traverse land that was surveyed for historic heritage within the development footprint and therefore no additional impacts on historic heritage is anticipated. Works to install the water supply infrastructure would be undertaken in accordance with the Historic Heritage Management Plan.

Category	Impact assessment
Air quality	Installation of the water supply infrastructure will be undertaken within the development footprint and using the same construction activities as described in the EIS (i.e. clearing, creation of access tracks, use of heavy machinery) and therefore no additional air quality impacts are anticipated at sensitive receptors.
Noise	Installation of the water supply infrastructure will be undertaken within the development footprint and using the same construction activities as described in the EIS (i.e. clearing, creation of access tracks, use of heavy machinery) and therefore no additional noise impacts are anticipated at sensitive receptors.
Visual amenity	The water supply infrastructure will be within the development footprint and will appear similar to other infrastructure being constructed as part of the Project. Therefore, no additional visual amenity impacts are anticipated at sensitive receptors.
Other	It is considered that there would be no change to other potential impacts such as bushfire, hazards and risk, social and waste management as the water supply infrastructure is within the development footprint and similar to other infrastructure being developed as part of the Project.

3.2 Dams within Project development footprint

3.2.1 Description of water supply

There are in the order of 10 smaller farm dams located within the Project development footprint which are approved to be filled in as part of construction works for the Project. Prior to filling in the dams, UPC is proposing to utilise any remaining water for construction purposes. Water would be obtained from these dams using a portable water pump to fill water trucks, water carts or other light vehicles as required.

3.2.2 Environmental impact assessment and licencing requirements

The smaller farm dams have a combined capacity of approximately 0.5 ML and store surface water runoff under the Harvestable Rights provisions (s53) of the WM Act, and are proposed to be filled in as part of the Project EIS. As such, there is no change to the potential impacts assessed as part of the EIS in relation to farm dams within the development footprint.

3.3 Uralla Shire Council wastewater treatment facility

3.3.1 Description of water supply

UPC has entered into discussions with Uralla Shire Council with regards to the potential use of treated water from Uralla's wastewater treatment plant. It is understood that the wastewater treatment plant currently produces in the order of 150 kL/day of treated water. The use of this water will be subject to further consultation with Uralla Shire Council and will be dependent on a review of water quality information to confirm the suitability of the treated water for use during construction. Additional treatment infrastructure may be required at the sewerage treatment plant to allow for the reuse of this water during construction.

3.3.2 Environmental impact assessment and licencing requirements

Treated water (if used) would be transported via the New England Highway, Barleyfields Road, Big Ridge Road and the two access points off Big Ridge Road as required by Schedule 3 CoC 3. Transport of potable water would not exceed the heavy vehicle movement limits required by Schedule 3 CoC 1.

If used, the treated water would be assessed for its suitability using the *National Guidelines for Water Recycling* (EPHC, NRMMC & AHM, 2006) in consultation with the Environment Protection Authority and DPIE. These guidelines focus on human health risk assessment and management and are most relevant where there is human exposure to recycled water.

If additional infrastructure is required, relevant planning approvals would be obtained by Uralla Shire Council.

3.4 Uralla and Walcha Shire Council water main

3.4.1 Description of water supply

Potable water for construction and operation of the Project would be supplied via mains water from Uralla Shire Council or Walcha Shire Council. The councils have indicated that adequate supply would be available for the proposed potable water demand (i.e. 4 kL/day during construction and 0.5 kL/day during operation). The potable water would be trucked to the Project area as described in the EIS.

3.4.2 Environmental impact assessment and licencing requirements

Potable water would be transported via the New England Highway, Barleyfields Road, Big Ridge Road and the two access points off Big Ridge Road as required by Schedule 3 CoC 3. Transport of potable water would not exceed the heavy vehicle movement limits required by Schedule 3, CoC 1, and there would be no other change to potential impacts assessed in the EIS.

4. Conclusion

No additional environmental impacts are anticipated from any of the water supply options to that assessed in the EIS.

The quantum of water available from the Broombee Stud dam is more than adequate to meet construction water demand for the Project. The Broombee Stud dam may also be available to supply all of the operational water demand for the Project, or otherwise the treated wastewater from Uralla Shire Council will meet the operational demand.

Mains water from Walcha Shire Council or Uralla Shire Council will adequately meet the demand for construction and operational potable water use.

The supplementary options for construction and operational water supply from the farm dams within the development footprint and potential use of treated wastewater from Uralla Shire Council provide certainty of continued water supply for construction and operational purposes.

Therefore, the water supply options presented in this Strategy demonstrate that UPC has sufficient water for all stages of the Project in accordance with Schedule 3 CoC 20. UPC requests the Secretary to confirm in writing that this Strategy fulfils the requirements of Schedule 3 CoC 20.

References

EMM Consulting Pty Ltd (2019a). New England Solar Farm: Environmental Impact Statement. Prepared for UPC Renewables Australia Pty Ltd, February 2019.

EMM Consulting Pty Ltd (2019b). New England Solar Farm Amendment Report, Prepared for UPC Renewables Australia Pty Ltd, June 2019

EMM Consulting Pty Ltd (2019c). New England. Solar Farm Response to Submissions, Prepared for UPC Renewables Australia Pty Ltd, June 2019

EMM Consulting Pty Ltd (2019d). New England Solar Farm Additional information package, Prepared for UPC Renewables Australia Pty Ltd, 31 October 2019

EMM Consulting Pty Ltd (2019e). New England Solar Farm Additional information, Prepared for UPC Renewables Australia Pty Ltd, 10 December 2019

Environment Protection and Heritage Council, the Natural Resource Management Ministerial Council and the Australian Health Ministers' Conference (EPHC, NRMMC & AHM) (2006). National Water Quality Management Strategy: Guidelines for Water Recycling – Managing Health and Environmental Risks (Phase 1).

NSW Office of Environment and Heritage (2017). Biodiversity Assessment Method.

Attachment A - DPIE Approval Letter

Mr Tim Kirk Project Development Manager UPC\AC Renewables Australia Level 14, 77 King St SYDNEY NSW 2000

19/02/2021

Dear Mr Kirk

New England Solar Farm (SSD-9255) Water Supply Strategy

I refer to the Water Supply Strategy submitted in accordance with Condition 20 of Schedule 3 of the Development Consent for the New England Solar Farm (SSD-9255).

The Department has carefully reviewed the document and is satisfied that it meets the requirements of the relevant conditions of consent.

Accordingly, the Planning Secretary has approved the Water Supply Strategy (Revision 2, dated 15 February 2021). Please ensure that the approved plan is placed on the project website at the earliest convenience.

If you wish to discuss the matter further, please contact Wayne Jones on 6575 4306.

Yours sincerely

Nicole Brewer Director Energy Assessments

As nominee of the Planning Secretary