

11 January 2019

Office of the Coordinator-General
Level 17, 1 William Street
Brisbane QLD 4000

Dear David Stolz

AP2018/002 Response to Referral Entities' request for additional information - Aldoga Solar Farm

Further to the coordinated request for additional information requested by referral entities dated 20 December 2018, please find attached the applicant's response to the information request.

Environment/Water

1.0 Water Management

Lots 1/SP301578 and 29/RP894241 are located within the boundaries of the Water Plan (Calliope Basin) 2006 (Calliope WP) which regulates surface water (water in watercourses and overland flow).

Under the Calliope WP provisions, a storage can be constructed to take overland flow water to satisfy the requirements of an environmental authority or under the code for self-assessable development for taking overland flow water, using limited capacity works to a maximum capacity of not more than 5 Megalitres.

The Surface Water Assessment prepared by AECOM Australia Pty Ltd supporting the application identifies that 'An operational management plan will be developed for the project which will details methods for minimising sediment-laden runoff in accordance with best practice guidelines'.

The proponent is requested to provide additional information to allow the Department of Natural Resources, Mines and Energy (DNRME) to investigate the ability of any storage(s) to capture overland flow water/sediment-laden runoff.

Response

As per the Stormwater Impact Assessment (Section 5 of the Surface Water Assessment), stormwater discharging from the Project area during the operation phase is anticipated to be of a quality that will not impact the surface water receiving environment. Treatment and/or detention of stormwater for the removal of sediments and gross pollutants prior to the release to the environment is therefore not considered necessary based on the modelling undertaken as part of the Surface Water Assessment. Should it be determined that mitigation measures are required to minimise sediment-laden runoff based on the finalised solar farm layout and design, appropriate methods such as sediment basins will be adopted in accordance with best practice guidelines.

In relation to the discharge of sediment during the construction phase of the project, a construction environmental management plan will be developed for the Project which will detail methods for minimising sediment-laden runoff in accordance with Best Practice Erosion and Sediment (BPESC) guidelines (IECA Best Practice Erosion and Sediment Control – For Construction and Building Sites, 2008).

In light of the above response, it is considered that compliance matters relating to overland flow can be suitably conditioned by the OCG as part of the development approval and implemented through the Construction Environmental Management Plan, Erosion Sediment Control Plan and Operational Environmental Management Plan prepared for the project.

2.0 Potential impacts on watercourses

It is noted the site layout is indicative and subject to final design configuration which are yet to be finalised. The proposed location of the project footprint extends across features which may be considered a drainage feature or a watercourse for the purposes of the Water Act 2000.

The proponent is requested to demonstrate the development will not impact the natural ecosystems or physical integrity of watercourses defined by the Water Act 2000 and existing water users in this area.

To assist, it is recommended the proponent contact DNRME to request a Watercourse Determination at the proposed site to understand obligations under the Water Act 2000. A request for a determination can be made to DNRME via centralwaterservices@dnrme.qld.gov.au.

If it is determined that a watercourse defined under the Water Act 2000 is present at the proposed site, the proponent may need to obtain statutory authorisations to cover aspects of the proposed development not included in this application. In this context, the proponent is encouraged to seek separate advice from DNRME on relevant authorisations which may be required.

If the proponent needs to excavate or place fill within a watercourse, lake or spring, a riverine protection permit may be required. For further details, see <https://www.business.qld.gov.au/industry/water/managing-accessing/accessing-water/authorisations/riverine-protection>. There are exemptions to requiring a riverine protection permit (refer to embedded web link address) should the proponent be able to meet the exemption criteria.

Response

The Applicant recognises that proposed project infrastructure may extend across features which could be considered a drainage feature or a watercourse for the purposes of the *Water Act 2000*. As such, a watercourse determination request was sent to DNRME's Central Water Services team for the project on 21 December 2018 to determine the classification of watercourses on the site under the *Water Act 2000* that are identified as 'grey – unmapped/yet to be mapped'.

Should it be determined that a watercourse (as defined under the *Water Act 2000*) is to be impacted by project infrastructure on the site, a Riverine Protection Permit will be applied for if the works cannot comply with the Riverine protection permit exemption requirements or excavation/fill thresholds.

It is noted that this will be assessed as part of a separate statutory authorisation process to the SDA Application and separate advice will be sought from DNRME where relevant.

Strategic Planning

3.0 Priority Port of Gladstone Master Plan

The project site is included in the Priority Port of Gladstone Master Plan which was released on 5 November 2018, after the SDA development application was submitted. The Master Plan was available for public consultation from 28 August 2017 to 9 October 2017.

The proposed development is located within the Port, Industry and Commerce precinct within the master plan. The Master Plan precinct intent focuses on infrastructure that “supports the operation of the port and industry e.g. uses in this precinct may include manufacturing industries, refineries, warehouses, wholesale trade, transport services, distribution centres and associated residue storage and waste management facilities.”

The proponent is requested to demonstrate the proposed development’s consistency with the Priority Port of Gladstone Master Plan.

Response

It is acknowledged that the project site falls within the Port, Industry and Commerce Precinct of the Priority Port of Gladstone Master Plan. As per the precinct intent, *this precinct may also include other development that does not compromise the existing and future expansion of port operations, port-related industry and supply chain infrastructure.* In this regard, it is reinforced that the project is a direct initiative of the State Government through the realisation of one of the key elements of EDQ’s Advancing our Cities and Regions Strategy to repurpose underutilised State-owned land that has been vacant for a substantial period of time.

Economic Development Queensland has identified this project as a strategically important interim use within the GSDA as it is unlikely that the land would otherwise be developed for industrial development within the next 30 years.

The proposed solar farm will not compromise the development of surrounding vacant land parcels for port related industrial development and will support the overarching intent of the Priority Port of Gladstone Master Plan to provide significant economic benefits to the region through employment and efficient power generation.

The importance of essential infrastructure including electricity network infrastructure is recognised within the Master Plan to service the operation of the port and port-related development. As stated within the Master Plan in regards to port optimisation (page 19); *to operate efficiently the port relies on the region’s integrated infrastructure network. This network comprises road, rail, shipping and other transport infrastructure, telecommunications, water and gas pipelines, and electricity generation and transmission assets. The infrastructure network supports economic productivity and is a critical factor in optimising the movement of goods to and from the port and its connected industries and consumers.*

Waterways and Fish Passage

4.0 DAF additional comments

As per the information request table issued by DAF on 24 December 2018.

Response

It is acknowledged that the Department of Agriculture and Fisheries (DAF) provided a submission requesting additional information on 24 December 2018 after the required response date of 18 December 2018. Notwithstanding the missed information response date, the matters raised have been duly considered as they relate to the SDA application.

It is our position that the issues raised in DAF's response concerning waterways and fish passage are largely inconsequential in the context of assessing this SDA Material Change of Use application as operational works for waterway barrier works will be separately considered and applied for (if necessary) following the SDA approval.

As stated within Section 5.5 of the SDA Application Planning Report, the solar farm layout has been designed to generally avoid mapped waterways under the *Fisheries Act 1994*. This aside, limited works will occur within mapped waterways for the establishment of linear infrastructure (internal access tracks and medium voltage cables). In these circumstances works will be designed and constructed in accordance with the *Accepted Development Requirements for Operational Work that is Constructing or Raising Waterway Barrier Works*. Where the works cannot meet the accepted development requirements, development approval will be obtained via the State Assessment Referral Agency (SARA).

The current revision of the solar farm layout and design drawings does not include details and specifications on waterway crossings for access tracks and cables. Once crossing details are finalised in terms of the extent of infrastructure proposed within the low flow channel of waterways, a detailed assessment will be carried out against the *Accepted Development Requirements for Operational Work that is Constructing or Raising Waterway Barrier Works*.

Summary

We trust that this letter and the information provided satisfactorily addresses the matter raised by the referral entities in the information request letter and enables the application to be progressed to the next stage of the application process.

Should you have any queries regarding the responses to matters raised in the information request, please do not hesitate to contact me directly.

Kind regards



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