



Department of Planning and Environment

OUT22/363

Iwan Davies
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NSW Department of Planning and Environment

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Dear Mr Davies

**Project EnergyConnect (NSW - Eastern Section) (SSI-9172452)
Environmental Impact Statement (EIS)**

I refer to your email of 17 January 2022 to the Department of Planning and Environment (DPE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

This project is the development of a new transmission line connecting Buronga Substation and Wagga Wagga Substation, and construction of the new Dinawan Substation (170 km west of Wagga Wagga).

DPE Water and NRAR have reviewed the EIS and have a number of post approval recommendations for surface water impacts, water take and groundwater management.

Any further referrals to DPE Water and NRAR can be sent by email to water.assessments@dpie.nsw.gov.au or to the following coordinating officer within DPE Water:

Alistair Drew – Project Officer
E: alistair.drew@dpie.nsw.gov.au

Yours sincerely

A handwritten signature in blue ink that reads "Liz Rogers".

Liz Rogers
Manager, Assessments, Knowledge Division
Department of Planning and Environment: Water
11 February 2022

Attachment A

Detailed advice to DPE Planning & Assessment regarding the Project EnergyConnect (NSW - Eastern Section) (SSI-9172452) EIS

1.0 Surface Water Impacts

1.1 Recommendations – Post Approval

- The geomorphic assessment should include assessment of inherent geomorphic vulnerability and management options to protect, stabilise and/or rehabilitate watercourses should impacts occur.
- The Construction Environmental Management Plan should be provided to DPE Water for review and include a geomorphic condition monitoring program for watercourses in proximity to any structures, works or material stockpiling. This should identify any ongoing changes to watercourses in poor or moderate geomorphic condition and detect degradation in watercourses that are classed as being in good geomorphic condition or have high geomorphic recovery potential. A procedure to identify and address any impacts that arise should also be included.

1.2 Explanation

Potential impacts to watercourses, lakes and wetlands are assessed as minimal as transmission towers will be constructed outside the banks of major watercourses and in areas of floodplains that have highly dispersed flood flow characteristics.

However, the hydrology, flooding and water quality assessment acknowledges impacts may occur to minor watercourses and flow paths, due to changes in low flow channel shape due to temporary works changing local runoff behaviour and increased sediment load from construction area runoff.

No disturbance crossing techniques are proposed for major rivers. Smaller watercourses will be crossed using tracks, including rock fill crossing points finished to bed level. EnergyConnect makes a commitment to comply with fish passage guidelines and Guidelines for Controlled Activities on Waterfront Land (NRAR 2018) and erosion and sediment control in line with the LandCom 2004 Guideline. Geomorphological impacts are acknowledged in s. 6.2 for minor watercourses (1-2 Strahler stream order) where transmission towers are constructed within smaller watercourse channels.

A series of mitigation measures are proposed to address potential impacts to watercourses and other water bodies. Several of these measures require detailed site investigations for implementation. There is no specific geomorphic monitoring or procedure in place to identify and address any impacts that arise. This should be prepared in the Construction Environmental Management Plan.

2.0 Water Take and Licensing

2.1 Recommendations – Post Approval

- The proponent must obtain relevant approvals and licences under the *Water Management Act 2000* before commencing any works which intercept or extract groundwater or surface water.
- The proponent must ensure that relevant nomination of work dealing applications for Water Access Licences proposed to account for water take by the project have been completed prior to the water take occurring.
- The proponent should be aware of the rules of the relevant water sharing plans and how they may impact the project and ability to trade or take water.

- 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 must be carried out to meet the requirements of the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018).

2.2 Explanation

Water demands over the 18 month construction period for this project are significant with an estimated 1100ML. This comprises water for dust suppression (768ML), earthworks compaction (203ML), concrete batching (20ML), vehicle washdown (11ML) and camp sites (100ML). The proponent has conducted initial consultation with water suppliers and existing licence holders and identified 26 potential sources. Whilst agreements to supply the necessary volumes are yet to be secured, the proponent is aware of the water market and potential water availability. This is considered sufficient for the proponent to understand the risk in addressing the water demands. However due to the large water volumes required it is recommended continued consultation takes place to secure access to the necessary water.

No additional water extraction infrastructure has been proposed by this project. It is understood the proponent would utilise existing approved infrastructure or water suppliers to transport water to the site. If additional infrastructure is deemed necessary, this may require additional approvals under water legislation and associated impact assessments.

If the proponent intends to purchase water entitlement for extraction from an existing extraction point, this may require additional impact assessment and would need to meet the rules of the relevant Water Sharing Plan and Access Licence Dealings Principles Order.

Where there is the potential for water take/dewatering associated with excavation or other activities to exceed 3ML in a water year, sufficient entitlement must be obtained in the relevant water source prior to the take occurring.

Where works are required near or within watercourses such as temporary laydown areas, tower construction, watercourse crossings and access tracks there is the potential for impacts to watercourses, both at the construction sites and downstream. It is understood that a Construction Environmental Management Plan will be prepared, along with associated sub-plans including a Soil and Water sub-plan. This is supported and the plans will need to ensure adequate buffers and controls are in place to minimise impacts to watercourses. This should be consistent with the “*Guidelines for Controlled Activities on Waterfront Land* (NRAR 2018)” and industry standard erosion and sediment control guidelines eg. “*Managing Urban Stormwater: Soils and Construction* (Landcom 2004)”.

3.0 Groundwater Impacts

3.1 Recommendations – Post Approval

The proponent should:

- Include in the groundwater section in the soil and water sub-plan of the CEMP (in addition to management of dewatering and other construction activities) processes for managing or mitigating potential impacts on Groundwater Dependent Ecosystems (GDEs) and impacted bores. The proponent should be able to demonstrate that its operations do not impact high potential GDEs or registered bores. The sub-plan should describe the assessment of high potential GDEs or registered bores within 50 metres of a blasting site against the Aquifer Interference Policy (2012) (AIP) minimum impact criteria and detail management, monitoring and mitigation measures proposed for these sites. This sub-plan should be provided to DPE Water for review.
- Record and report on the above management activities including how the high potential GDEs and registered bores within 50 metres of a blasting site have not been impacted and all

dewatering volumes from the sites collectively during a water calendar year (July to June) in each groundwater source.

3.2 Explanation

The proponent outlines how the majority of impacts from the proposal during the construction phase would be managed through a Construction Environmental Management Plan (CEMP) which would include a soil and water sub-plan (SWMP). Groundwater mitigation measures would be incorporated in the SWMP which would detail appropriate measures in the event that groundwater is encountered during construction.

With regards to blasting use where a high potential GDE or registered bore are identified within 50 metres of the blast location further assessment considering the encountered geology, hydrogeology, likely blast impact radius and the resulting risk to the high potential GDE or registered bore is to be undertaken and mitigation measures adopted for inclusion in the CEMP. The proponent should conduct an updated assessment for the sites against the AIP (2012) minimum impact criteria, detailing management and mitigation measures proposed for the sites.

The proponent has correctly identified that for all dewatering that is necessary and not able to be minimised by adaptive management and construction strategies the volume from the sites during a water calendar year (July to June) in each groundwater source collectively will need to be recorded. These volumes are also to be reported in the Annual Environmental reporting.

End Attachment A