

Mr Andy Nixey  
Principal Planning Officer  
Energy Res Industry Assessments  
Department of Planning and Environment  
4 Parramatta Square  
Parramatta NSW 2150

By email: [andy.nixey@planning.nsw.gov.au](mailto:andy.nixey@planning.nsw.gov.au)

Dear Mr Nixey

**Re: Major Projects – Request for Advice - Shoalhaven Hydro Geotech Works MOD 1 - Adding 1 Borehole (SSI-9816-Mod-1) (Shoalhaven City, Wingecarribee Shire)**

We refer to your request for Biodiversity and Conservation Division (BCD) input regarding the relocation of one exploratory borehole subsequent to the eight previously approved, of which four have been successfully undertaken in August 2019. The proposed modification would involve drilling one additional deep borehole (location 9) of approximately 800 metres in depth, noting that previously excavations were proposed to reach depths ranging between 25 and 650 metres. The borehole would be located approximately 500 metres south of borehole location 2 and accessed by existing Promised Land Trail (Moreton National Park) and includes the associated access and works areas (disturbance footprint) that support the approved geotechnical works.

BCD note that the Modification Report gives a rationale for the additional borehole as:

In revisiting the reference design, a number of optimisations have been nominated with the most consequential being potential relocation of underground cavern for the power station and access portal and tunnel. To confirm the constructability of this optimised design, one priority revised borehole location (location 9) is proposed while borehole locations 4 and 5 are no longer proposed to be investigated.

On review, BCD have assessed that no additional disturbance of vegetation or habitat is proposed other than what has already been approved and therefore has no objection to the MOD in principle noting that:

- an area of approximately 1600 m<sup>2</sup> has been assessed for this MOD for location 9 in which geotechnical works area would be arranged to avoid the need for vegetation clearing while facilitating ongoing access, and rehabilitation is required post construction,
- waste generation and the containment of drilling fluids or contaminated materials are managed according to the requirements of the approval. Noting that the proposal mentions, 'downslope containment will be managed by a suitably sized berm to reduce runoff velocity and capture sediment prior to discharge into receiving waterbodies. The creation of berms will not require ground disturbance but would make use of wood.' This wood should not be collected from NPWS land.

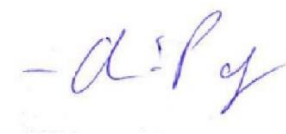
Additionally, BCD note that the findings from this investigation will inform the second stage of the Shoalhaven Hydro Main Works CSSI 10033 and the associated EIS currently under preparation. As such, we acknowledge the underground cavern originally posited as development associated

with boreholes 4 and 5 (WaterNSW lands) and that the modified borehole (location 9) is located immediately west of Morton National Park. Parts of Morton National Park also surround the proposed new borehole site to the north, west and south. In consultation, the NSW National Parks and Wildlife Service (NPWS) also makes the following comments on the proposal:

- No access to or works on park are to occur as part of this modification unless authorisation is granted by NPWS under the *National Parks and Wildlife Act 1974* (NPW Act) or the National Parks and Wildlife Regulation 2019.
- The [Developments adjacent to National Parks and Wildlife Service lands](#) (NPWS 2020) resource provides general guidance on the priority environmental considerations for impact assessments adjacent park. The Modification Report does not appear to have considered this document in its assessment of the modified proposal.
- Access to the proposed borehole (location 9) via the Promised Land Trail will require prior written consent from the NPWS. The applicant is advised to contact Graham Bush, Manager Illawarra Highlands Area, on (02) 4224 4189 or via email at [graham.bush@environment.nsw.gov.au](mailto:graham.bush@environment.nsw.gov.au) to discuss this matter further, including the potential need to monitor for ongoing impacts of access to this trail and the potential need for trail remediation or repair after its use. NPWS will require ongoing access along the entirety of the Promised Land Trail to allow for park management activities, unless otherwise agreed to in advance.
- Given the recreational value of the Promised Land Trail, it is recommended that works be limited to Monday to Friday, to minimise conflicts between construction vehicles and walkers and cyclists on weekends.
- Appropriate conditions should be applied to ensure monitoring of any impacts to adjacent lands (including the national park) occur at the applicant's expense during and following completion of works, and that any required rectification works to adjacent lands are undertaken.
- While it is noted that the scope of this amendment only relates to the modified borehole at location 9, it is noted that any subsequent works undertaken as part of the overall Shoalhaven Hydro project (CSSI 10033) would have to consider the tenure of any land on which the project is proposed. Parcels of national park north of the borehole (location 9) are depth restricted to a depth of 15 metres while parcels to the west and south have no depth restriction, and so any underground components of the overall proposal in those areas would be on NPWS estate. It is anticipated that any subsequent environmental impact assessment for the overall Shoalhaven Hydro project would clearly outline the tenure of lands on which the proposal was proposed to be sited, and would establish access/permisibility of the project under the NPW Act and the [Morton National Park, Budawang National Park Plan of Management](#) (NPWS 2001) if any such components were proposed on NPWS estate.

If you would like to discuss the contents of this letter in more detail, please contact Tania Ashworth, Senior Conservation Planning Officer, on 02 6229 7921 or via email at [tania.ashworth@environment.nsw.gov.au](mailto:tania.ashworth@environment.nsw.gov.au).

Yours sincerely



Chris Page                      24 August 2022  
**Senior Team Leader, Planning (Illawarra)**  
**South East Region**  
**Biodiversity and Conservation Division**