

Our ref: OUT24/14141

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16/09/2024

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Subject: **Baldon Wind Farm (SSD-40138508) - Environmental Impact Statement**

Dear Mr Wathen,

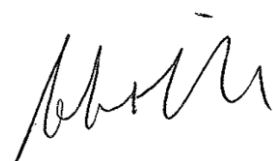
I refer to your request for advice sent on 14 August 2024 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

The proposed Baldon Wind Farm Project is a utility scale renewable energy project within the Southwest Renewable Energy Zone (REZ) and located near to significant transmission connection options. Up to approximately 180 wind turbines, up to approximately 1,400MW, up to approximately 180 wind turbines and all associated infrastructure required to access, construct, operate, maintain, refurbish and decommission the Project.

NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and has recommendations regarding water supply, take, licensing, High Priority GDEs, Guidelines for Controlled Activities and groundwater impacts. Please see **Attachment A** for more detail.

Should you have any further queries in relation to this submission please do not hesitate to contact Water Assessments [water.assessments@dpie.nsw.gov.au](mailto:water.assessments@dpie.nsw.gov.au).

Yours sincerely



Rob Brownbill,  
Manager, Water Assessments, Knowledge Division  
**NSW Department of Climate Change, Energy, the Environment and Water**

## Attachment A

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### Detailed advice to DPHI Planning regarding the Baldon Wind Farm (SSD-40138508) – Environmental Impact Statement

#### 1.0 Water supply, take and licensing

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##### 1.1 Recommendation – pre-determination

The proponent should clarify an ability to obtain a secure water supply for the Project. This is to include confirmation of relevant agreements where required and to demonstrate sufficient water entitlements can be acquired where necessary.

##### Explanation

Insufficient information has been provided to confirm access to a secure and appropriately authorised water supply for the Project. Options to source the approximate 250 ML/year of water required for the Project's construction phase have been proposed, however, the ability to obtain the Project's water demands from these options has not been demonstrated.

Where water is to be sourced from a currently unauthorised source and/or where additional water take infrastructure is required e.g., a river pump, dam, and or a bore, an impact assessment of this infrastructure development and water take will be required.

##### 1.2 Recommendation – pre-determination

The proponent should identify if excavations will intercept groundwater, and if they will, the maximum annual volume of water groundwater take due to these excavations should be quantified. The proponent should demonstrate that sufficient entitlement can be acquired in the relevant water source(s) to account for the maximum annual volume of groundwater take, unless an exemption applies.

##### Explanation

Excavations required for the project will include up to 180 cuttings to create a level and stable foundation for the hardstands and wind turbine foundations. These cuttings are anticipated to be limited to depths of approximately 3 to 5 metres and have been proposed in the EIS as having minimal impact on water dependent assets in accordance with Section 3.3 of the NSW Aquifer Interference Policy (2012). However, an aquifer interference activity such as a cutting can only be defined as having a minimal impact on water dependent assets if it intersects the groundwater table and a water access licence is not required. The EIS has not presented any groundwater level information that can be used to determine whether aquifer interception will or won't occur due to the Project's excavations, and if it will occur, whether a WAL with sufficient entitlement is required to account for the groundwater take that will be required to dewater the Project's excavations.

##### 1.3 Recommendation – pre-determination

The proponent should review and amend project's infrastructure to provide setbacks from waterfront land in accordance with the Guidelines for Controlled Activities.

##### Explanation

There are multiple minor and major watercourses, a wetland (Gunyah Swamp), and a lake (Rawley's Lake) within the Project Area. The EIS states that the design and rehabilitation of works required within waterways will adhere to the Guidelines for Controlled Activities. This is supported, however, based on a review of the development corridors as shown in Figure 6-29 of the Project's EIS, the Project is proposing to locate infrastructure within waterfront land, such as wind turbines within Guyah Swamp, Abercrombie Creek and other areas of waterfront land mapped within the project area. This is not supported as the infrastructure should be setback from waterfront land in accordance with buffer requirements provided in Guidelines for Controlled Activities.

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## 2.0 Sewerage management

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### 2.1 Recommendation – pre-determination

The proponent should confirm:

- the method of disposal/transfer of sewage, effluent and/or septage, including availability of liquid waste contractors, during both the construction and operational phases.
- with the relevant local water utility which sewerage system will receive and manage the sewage load (if this option is preferred), and if this system can accommodate the wastewater demands without impacting existing services.
- with the relevant local water utility, the impact of the project and potential additional costs from infrastructure upgrades or increased operational activities.

#### Explanation

An option is proposed to take waste to local waste management facilities but there are no specifics or demonstrated arrangements/agreements provided.

## 3.0 Groundwater impacts

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### 3.1 Recommendation – pre-determination

If the take of groundwater is found to be greater than 3 ML per year, the proponent must assess the impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). These documents are available at:

- [https://water.dpie.nsw.gov.au/\\_data/assets/pdf\\_file/0005/151772/NSW-Aquifer-Interference-Policy.pdf](https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0005/151772/NSW-Aquifer-Interference-Policy.pdf)
- [https://water.dpie.nsw.gov.au/\\_data/assets/pdf\\_file/0007/171097/Aquifer-Interference-Assessment-Framework.pdf](https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0007/171097/Aquifer-Interference-Assessment-Framework.pdf)

#### Explanation

Although groundwater take is not anticipated to be significant, as per Recommendation 1.1 above, the EIS has not provided a volumetric quantification of groundwater take. Additionally, the EIS has not provided an assessment of impacts to groundwater due to construction or operation of the project. Although a comprehensive groundwater study prior to determination is unnecessary given the perceived low level of risk, NSW DCCEEW Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.

**End Attachment A**

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