NSW Department of Climate Change, Energy, the Environment and Water

Our ref: OUT24/14910

Lauren Clear
Planning Group
NSW Department of Planning, Housing and Infrastructure

Email: lauren.clear@dpie.nsw.gov.au

2/10/2024

Subject: **Bullawah Wind Farm (SSD-50505215) – Environmental Impact Statement**

Dear Ms Clear,

I refer to your request for advice sent on 27 August 2024 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

Bullawah Wind Farm Pty Ltd (BWF) proposes to develop the Bullawah Wind Farm (the Project) to provide a reliable and affordable source of energy for the people of New South Wales (NSW). The Project is located approximately 36 km southeast of the township of Hay, in the Riverina region of south western NSW.

NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and has recommendations regarding water supply, take, licensing 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.

Yours sincerely

CBrooke

Cherelle Brooke,
A/Manager, Water Assessments, Knowledge Division
NSW Department of Climate Change, Energy, the Environment and Water

Attachment A

Detailed advice to DPHI Planning regarding the Bullawah Wind Farm (SSD-50505215) – Environmental Impact Statement

1.0 Water supply, take and licensing

1.1 Recommendation – pre-determination

Clarification be provided on the 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.

Where the 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.

Explanation

Insufficient information has been provided to confirm access to a secure and appropriately authorised water supply for the Project. Preferred options to source the approximate 301 ML 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.

1.2 Recommendation – pre-determination

The Proponent provides further groundwater level information to identify if the Project's excavations will intercept groundwater, and if they will, that it quantifies the maximum annual volume of water take due to aquifer interference activities required for the Project and demonstrates that sufficient entitlement can be acquired in the relevant water source(s) unless an exemption applies.

Explanation

Excavations required for the Project will include:

- Up to 143 cuttings to create a level and stable foundation for the Project's wind turbine foundations. Excavations for this type of work will be approximately 30 by 30 metres and at a depth of 4 metres below ground level.
- Two quarries, which will be used as borrow pits to source gravel on site during the Project's construction phase. The two borrow pits will measure approximately 250 by 250 metres, and the Proponent has committed to not excavating more than 17 metres below ground level for the quarries to provide at least 3 metres of cover for the regional groundwater table.

  The Proponent has characterised the regional groundwater table for the Project Area based on the water level data from one monitoring bore (GW036235). This water level data alone cannot be used to determine the regional groundwater table for the entire Project Area and to establish whether aquifer interception will or won't occur due to the Project's excavations.

Under the *Water Management Act 2000*, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under Clause 7 of Schedule 4 of the Water Management (General) Regulation 2018 applies. An exemption may be available if water take is less than or equal to 3 ML per water year, subject to the development meeting other exemption requirements, such as:

- the water is not taken for consumption or supply;
- the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and
- the records are kept for 5 years.

Further information on these requirements and other information on licensing and approvals, exemptions, including an exemption application form and a form to report and record water taken can be found at:
https://water.dpie.nsw.gov.au/licensing-and-trade

1.3 Recommendation – pre-determination

The Proponent review the impact of the Project on the High Priority GDEs that are mapped along Coleambally Outfall Drain in the High Priority Groundwater Dependent Ecosystem (GDE) Map (GDE018_Version 1) in the WSP for the Murrumbidgee Alluvial Groundwater Sources 2020. This is especially important if groundwater bores are going to be utilised as a supply to meet the Project's construction and or operational phase water demands.

Explanation
Based on a review of the High Priority Groundwater Dependent Ecosystem (GDE) Map (GDE018_Version 1) in the WSP for the Murrumbidgee Alluvial Groundwater Sources 2020, the Project Area will include High Priority GDEs that are mapped along Coleambally Outfall Drain. Currently, the Proponent has only identified the low, medium and high potential GDEs that are mapped in the Australian Government's Bureau of Meteorology Groundwater Dependant Ecosystems Atlas.

2.0 Groundwater impacts

2.1 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/0007/171097/Aquifer-Interference-Assessment-Framework.pdf

Explanation
As per Recommendation 1.2 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. 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.

3.0 Water utilities

3.1 Recommendation – pre-determination

The proponent should provide further information on the projects impact on town water supply. This should include:

- demonstration that the relevant Local Water Utilities are satisfied there is enough capacity within the relevant town water systems to accommodate any water demands without impacting existing services.
- confirmation of water carting arrangements by providing detail that there are carting providers available to cart water for the construction phase of the project.
- Detail of whether there will be any cumulative impacts to water and sewer supply, along with other projects in the region.

Explanation
The EIS notes that the project will have a peak daily demand 40 kL/day potable water. No information has been provided as to whether the local water utility supports the use of potable water and whether this will impact existing town water supplies. The EIS does not include a cumulative impact assessment on water use, town water and sewer supply.

3.2 Recommendation – pre-determination

The proponent should provide further information on the projects impact on sewer. This should include:

- Confirmation of wastewater demands for the project.
- Details of the method of disposal/transfer of sewage, effluent and/or septage, including availability of liquid waste contractors, during both the construction and operational phases.
- Confirmation 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.
- Confirmation with the relevant local water utility, the impact of the project and potential additional costs from infrastructure upgrades or increased operational activities.

Explanation
The EIS notes Wastewater from amenities during all phases of the Project will be captured in a tank and transferred periodically by a suitably licensed contractor to an appropriate wastewater treatment facility. No information is provided on wastewater demands and which facility will receive the wastewater.

End Attachment A