

16 January 2025

Contact: *Nicole Wallwood*
WaterNSW ref: D2024/143596

Pragya Mathema
Planning Officer
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Pragya

WaterNSW Response to Draft SEARs for Bannaby BESS (SSD-78810458)

WaterNSW appreciates the opportunity to provide advice regarding the drafted SEARs and the Scoping Report for the Bannaby Battery Energy Storage System (BESS)(SSD-78810458). WaterNSW has reviewed the Scoping Report prepared by GHD Pty Ltd (dated 19 December 2024).

As the development is located within the Sydney Drinking Water Catchment, section 6.61(1) and 6.63 of the *State Environmental Planning Policy (Biodiversity and Conservation) 2021*(the SEPP) apply including an assessment of the development's neutral or beneficial effect (NorBE) on water quality.

WaterNSW notes similar developments (Swallow Tail and Hanworth BESS) proposed within the same sub-catchment (Wollondilly River sub-catchment). As such, WaterNSW considers that the Department of Planning, Housing and Infrastructure should require an assessment of the cumulative impacts for all proposed projects within this sub-catchment, on the downstream environment, particularly given the soil types in this area are highly erodible.

WaterNSW also notes there is no reference to Part 6.5 of the SEPP or NorBE requirements in the Scoping Report or the draft SEARs.

WaterNSW has reviewed the draft SEARs in relation to potential water quality impacts and requests that the following be included:

- reference to *State Environmental Planning Policy (Biodiversity and Conservation) 2021*(the SEPP) Section 6.61(1) and 6.63, the Neutral or Beneficial Effect on Water Quality Assessment Guideline (2022) and associated current recommended practices and requirements for assessment
- a Site and Soil Evaluation for On-Site Wastewater Disposal for both construction and operation phases (where applicable)
- a conceptual Soil and Water Management Plan(s) for the construction phase of the project, and
- a conceptual Operational and Environmental Management Plan for the project.

It is requested that WaterNSW be listed a stakeholder in any further consultation on the project. WaterNSW looks forward to reviewing the forthcoming EIS.

If you have any questions, please contact Nicole Wallwood via email at environmental.assessments@watnsw.com.au

Yours sincerely



JURI JUNG
Catchment Protection Manager