

Our ref: OUT25/10080

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25 August 2025

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Subject: Victoria to NSW Interconnector West (SSD-72887208) – Environmental Impact Statement

Dear Anthony Ko,

I refer to your request for advice sent on 30 July 2025 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and makes recommendations in regard to:

- Confirming access to water to meet the projects water demands and to identify and assess the impacts of any additional water supply works.
- Confirming access to water licences where required.
- Quantifying groundwater take, impacts and licensing.
- Clarifying works on waterfront land.
- Confirming the water demands for operation.

Please see Attachment A for detailed advice.

Should you have any further queries in relation to this submission please do not hesitate to contact the Water Assessments team at [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 & Assessment regarding the Victoria to NSW Interconnector West (SSD-72887208) – EIS

#### 1.0 Water licensing and take

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##### 1.1 Recommendation – pre-determination

The Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to:

- Quantify the maximum annual volume of water take due to aquifer interference activities,
- Identify and assess the impacts of any additional water supply works (eg. pumps), and
- Demonstrate the ability to acquire sufficient water entitlement unless an exemption applies.

##### Explanation

Insufficient information has been provided to confirm the potential groundwater inflow volumes. The EIS states groundwater will be intercepted at many locations and will potentially exceed 3ML/year, however the inflow volumes have not been quantified. It is noted the proponent has requested to quantify this at the detailed design stage, however DCCEEW Water seeks this information prior to determination to inform the need for additional assessment requirements and the ability to obtain entitlement if necessary or the applicability of an exemption.

Identification and assessment of the construction and/or use of water supply works to manage water is required to enable exemptions to water legislation approval requirements under section 5.23 of the *Environmental Planning and Assessment Act 1979* to apply.

##### 1.2 Recommendation – post-determination

DPHI request the proponent to ensure a water access licence (WAL) is obtained to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the Water Management (General) Regulation 2018 (WM Reg).

##### Explanation

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 the Water Management (General) Regulation 2018 applies. An exemption may be available where the groundwater take during construction or operation is less than or equal to 3ML per water year (cl 7, sch 4 of WM Reg). To claim this exemption certain requirements must be met, such as

- 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 and exemptions, including a form to report and record water taken can be found at: <https://water.dpie.nsw.gov.au/licensing-and-trade> and [Groundwater access licence exemptions | NSW Government Water](#).

## 2.0 Water demands and supply

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### 2.1 Recommendation – pre-determination

The Department of Planning, Housing and Infrastructure requests the proponent to:

- Identify and assess the impacts of construction and operation of any additional water supply works (eg. bores, pumps, dams) or the use of existing water supply works to provide water for the project.
- Clarify the operational water demands for the project.
- Clarify the ability to obtain the necessary volumes for construction and operation from the site or confirm a viable supply is available through evidence of consultation with a water supplier.
- Confirm availability and access to existing water entitlement should that be required.

#### Explanation

Insufficient information has been provided to determine if reliable and secure water supplies are available for the project. The proponent has indicated construction water demands of 1250ML comprising 1120ML of non-potable water and 113ML of potable water. This is a significant volume of water that is likely to be sourced over many water sources with significant administrative and potential assessment requirements.

Section 3.5.8.2 and 3.5.8.3 of the EIS refer to a range of potential supply options, however no evidence has been provided of the ability to source the necessary water from existing supplies via consultation with water suppliers, or the identification and assessment of extracting water from new points. Identifying potential water sources without demonstrating the ability to purchase or use existing Water Access Licences or assess the impacts of constructing and operating new water supply works is inadequate to confirm a feasible and reliable water supply.

Where new water supply works or additional water extraction from existing water supply works is required, these need to be identified, and their impacts assessed to enable exemptions to water legislation approval requirements under section 5.23 of the *Environmental Planning and Assessment Act 1979* to apply.

## 3.0 Works on waterfront land

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### 3.1 Recommendation – pre-determination

The Department of Planning, Housing and Infrastructure requests the proponent to clarify the proposed infrastructure layout meets the buffer requirements from watercourses as defined in the Guidelines for Controlled Activities on Waterfront Land (DPE 2022).

## Explanation

The project has identified works within 50m of a watercourse and used the definition of minor streams as up to and including 3<sup>rd</sup> Strahler order. This is inconsistent with the *Water Management Act 2000* which defines waterfront land as 40m from top of bank, and minor streams as up to and including 2<sup>nd</sup> Strahler order. Where there will be works within waterfront land the design and location must consider the Guidelines for Controlled Activities on Waterfront Land (DPE 2022) including watercourse stability, maintaining natural flow paths and not impacting existing riparian vegetation. Review of the location of project infrastructure such as transmission structures and workers accommodations is requested to ensure this has been considered.

The Temporary workers accommodations at Gregadoo Rd, Wagga A and C both appear to impact or cover mapped watercourses. The layout should be refined to remove works instream unless it is a watercourse crossing.

The Guidelines for Controlled Activities can be found: <https://water.dpie.nsw.gov.au/our-work/licensing-and-approvals/controlled-activity-approvals#guidelines-for-controlled-activity-approvals>

## 3.2 Recommendation – post-determination

The Department of Planning, Housing and Infrastructure requests the proponent to ensure works within waterfront land are in accordance with the Guidelines for Controlled Activities on Waterfront Land (DPE 2022).

## Explanation

Works are proposed on waterfront land which need to be designed and constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (DPE 2022).

End Attachment A