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DATE

9 February 2026

SUBJECT

Keri Keri Wind Farm (SSD-38358962)
Response to Request for Additional
Information

REFERENCE

0617753

Dear Nicole:

Keri Keri Wind Farm (SSD-38358962) – Request for Additional Information

We refer the Department's Request for Additional Information (Attachment A) dated 29 January 2026 which requested additional information to assist the Department's assessment of the Keri Keri Wind Farm.

The Department has requested that the Applicant provide a response to the agency advice provided by the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on the Environmental Impact Statement, dated 28 June 2024.

In response to the Department's request, additional information is provided in Table 1.

If you require any further clarification, please contact Mark Davey (Partner, [ERM](http://erm.com)) by email at mark.davey@erm.com.

Yours sincerely

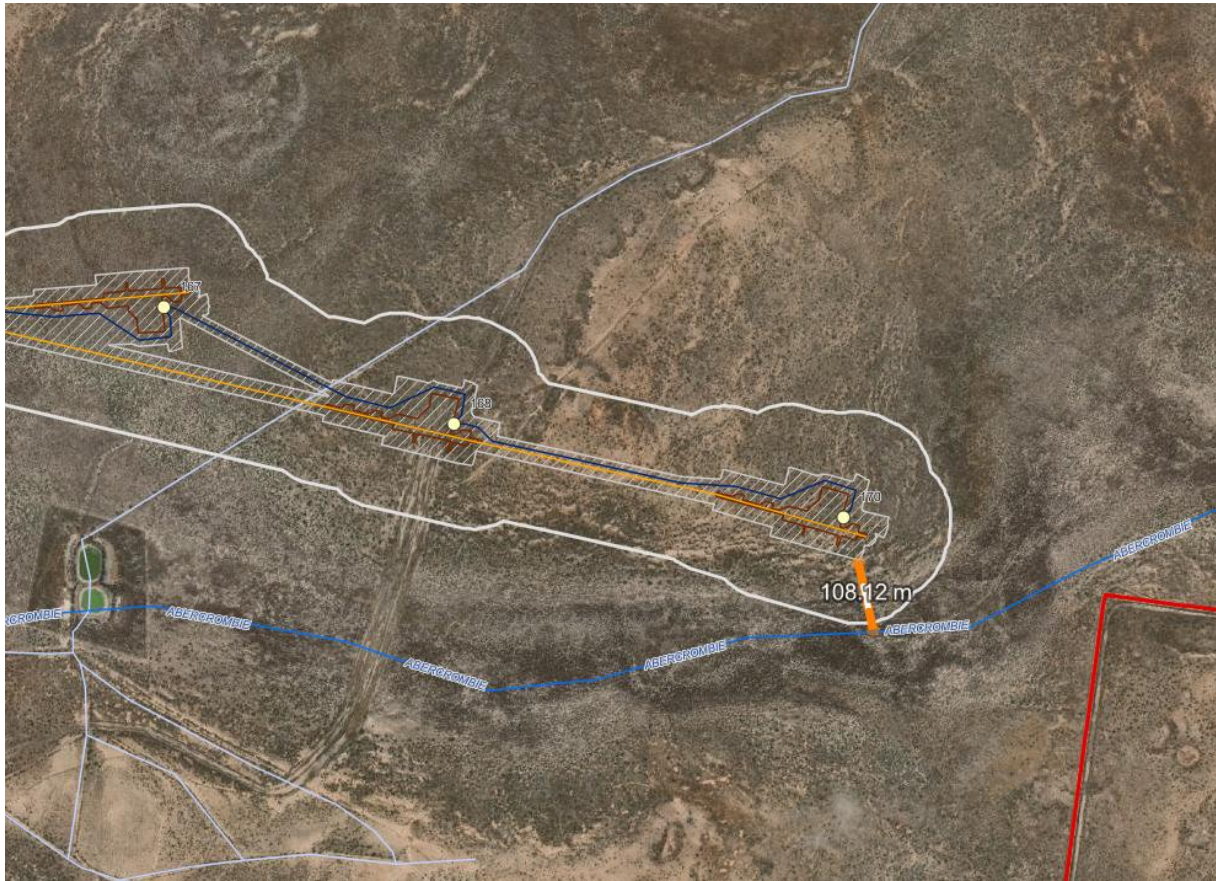
Mark Davey

Partner

TABLE 1 RESPONSE TO AGENCY ADVICE PROVIDED BY NSW DEPARTMENT OF CLIMATE CHANGE, ENERGY, THE ENVIRONMENT AND WATER (DCCEEW) WATER GROUP

Ref No.	Theme	Submission	Response	Where Addressed
WG-01	Water Supply / Demand	1.1 Recommendation – pre-determination: Clarify an ability to obtain a secure water supply for the project, including evidence of agreements where required, and demonstrate sufficient water entitlements can be acquired. Explanation: Insufficient information has been provided to confirm access to a secure water supply for the Project. Options to source the 160.5 ML/year required for the Project's construction state have been proposed; however, the ability to obtain the Project's water demands from these options has not been demonstrated. Where the water is to be sourced from a currently unauthorized 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.	The estimated construction water demand stated in the Keri Keri Wind Farm EIS (ERM, 2024) was 154 ML/year of non-potable water and 6.5 ML/year of potable water. The construction period assumed in the EIS was 24 months (with peak activities occurring over a 12-month period) and, therefore, total construction water demand for the Project estimated in the EIS was 308 ML non-potable water and 13 ML of potable water. The construction period for the amended Project has been optimised and is now estimated at 18 months (with peak activities occurring over a 12-month period). The reduction in both the construction period and Project layout (e.g., removal of 41 WTGs, removal of 2 site access points) has resulted in a reduction in the estimated construction water demand. The amended Project will require an estimated 66 ML/year of non-potable water and 31 ML/year of potable water. Estimated operational water demand has not changed. During construction, potable water demand is estimated to be 31 ML/year. To meet this demand, rainwater will be harvested from suitable roof areas (e.g., the workforce accommodation camp, site offices) and stored in rainwater tank. Harvested water will be passed through a filter and ultraviolet or ozone injection system to treat the water to a suitable quality for potable use. However, the volume of water harvested will likely be insufficient to meet construction potable water demand. As such, surplus potable water will need to be purchased and carted to site. The Applicant and construction contractor will identify options available in the region (or farther if needed) to purchase the construction potable water demand volume. This will be detailed in a Water Sourcing Plan (see below). Non-potable water demand during construction comprises most of the Project water demand (66 ML/year). The Applicant has and will continue to investigate options to source this water, including extraction from: • On-site farm dams (note that the landowner intends to de-stock the property during construction; therefore, this will not impact stock water requirements); • Groundwater aquifers, subject to necessary approvals and licences; • Permanent water sources, subject to necessary approvals and licences; and • Water harvested from suitable roof areas (e.g., the workforce accommodation camp) and stored in rainwater tanks. Water entitlements available under the Water Sharing Plan (WSP) for the Murrumbidgee Alluvial Groundwater Sources (2020) indicate that there is ample volume available to meet the Project's water demand. The long-term average annual extraction limit for the Lower Murrumbidgee Deep Groundwater Source, which underlies the Project Area, is 273,625 ML/year. The long-term average annual extraction limit for the Lower Murrumbidgee Shallow Groundwater Source, which also underlies the Project Area, is 26,875 ML/year. It should be noted that these 'limits' are updated yearly to account for variabilities, such as climate, access licence priorities and the provisions of the WSP. Generally, these annual extraction limits are not exhausted. In rare years when the 'limit' has been exceeded, this is due to accounting mechanisms, carryover rules (i.e., previous years allocations not being exhausted) and environmental factors (i.e., increased influx due to greater than average rainfall). Based on this, the Applicant assumes that adequate groundwater will be available through either existing (i.e., held by the Project landowners) or new Water Access Licence (WAL). The Applicant commits to undertaking the necessary groundwater impact assessments and, if necessary, will apply for the relevant Work Approval/s for ancillary works. Project landowners have access to water take from WAL41961, which has an annual allocation of 226 ML/year. This allocation is from the Murrumbidgee Regulated River Water Source. As	This table

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			stated above, the landowner intends to de-stock the property during construction and, therefore, any water take from this WAL will not impact domestic and stock use. This is a shared allocation and, therefore, will not meet the full construction water demand. If, for any reason, non-potable construction water demand cannot be met by the above mechanisms, the Applicant will purchase and cart in non-potable water from external sources. The Applicant commits to preparing a Water Sourcing Plan prior to the commencement of construction of the Project. The Water Sourcing Plan will be prepared in consultation with DCCEEW Water and Murray River Council. The Water Sourcing Plan will detail: • The project's water requirements, including the water required for each stage of construction and all potable water needs; • Sources of water to be used; • Any licencing requirements pursuant to the <i>Water Act 1912</i> and/or <i>Water Management Act 2000</i> and timing of obtaining such licences; • Measures to mitigate excessive water consumption/use during construction; • Monitoring and reporting of groundwater use; and • Measures and failsafe mechanising to be implemented should water sourcing availability change during construction. Potable water demand during operations is negligible (0.25 ML/year). Rainwater tanks and a water treatment system will be installed at the operations and maintenance (O&M) facility. Rainwater harvested from the O&M facility should be sufficient to meet operational potable water demand. However, if surplus potable water is required, this will be purchased and carted to site. Note that rainwater tanks for potable water supply will be independent to those required for firefighting. Non-potable water demand during operation is also negligible (e.g., for maintenance, dust suppression). Non-potable water for operation and maintenance purposes will be obtained from on-site farm dams, or via groundwater or river take subject to the necessary approvals and licences. The water demand for the Project will not impact Murray River Council's assets or ability to supply water within its jurisdiction. All volumes of water extracted for the Project will be done so pursuant to the relevant approvals and their respective conditions and volume limits. These approvals will be obtained prior to the commencement of construction and operation.	
WG-02	Water Access Agreement	1.2 Recommendation – Pre-determination Confirm whether the water access agreements with owners of stock and domestic bores and the impact assessment to supply water for project construction and operational needs have been completed. Work Approvals for the construction and operation of works to take groundwater under a domestic and stock right are not authorised to take water for production purposes unless an exemption applies. Explanation: The EIS notes that the preferred water supply option for the Project is to use existing groundwater bores and install additional groundwater bores. The proponent needs to be aware that the holder of a water supply works approval that is licenced to take groundwater under a domestic and stock right is not authorised to supply water for production (non-stock and domestic) purposes unless a groundwater impact assessment has been completed as part of this Project assessment. Additional water supply works approvals will be required for works not assessed or authorised under the Project's SSD approval.	Noted. The Applicant does not have a water access agreement with owners of stock and domestic bores; however, the Applicant has discussed the possibility of reaching such agreements with the Project landowners. Based on discussions to date, the landowners are open to forming such agreements. The Applicant will undertake a comprehensive groundwater investigation to inform the detailed design of the Project. This will ascertain true groundwater levels within the development footprint. If groundwater is recorded at depths that may be intercepted by excavation works, appropriate approvals will be obtained, or the design will be amended to avoid groundwater penetration.	This table

Ref No.	Theme	Submission	Response	Where Addressed
WG-03	Water Licensing	1.3 Recommendation – Pre-determination The proponent should review works proposed within waterfront land to demonstrate consistency with the Guidelines for Controlled Activities on Waterfront Land available at: https://www.water.dpie.nsw.gov.au/licensing-and-trade/controlled-activity-approvals/guidelines Explanation: No consideration of the Guidelines for Controlled Activities on Waterfront Land has been given for any of the Project's work. This is believed to be due to the assumption that the watercourses within the Project area are said to not meet the definition of rivers that constitute 'waterfront land' under the <i>Water Management Act 2000</i>, and as such the Project does not involve works within 40 m of waterfront land. This is incorrect as there are multiple watercourses that fall within the Project area, with the most significant being Abercrombie Creek, a 9th Strahler order watercourse that traverses the south of the Project area. Based on the layout of the Project, works are likely to occur within 40 m of watercourses. The Project needs to consider the Guidelines for Controlled Activities on Waterfront Land for the watercourses that fall within the Project area.	Noted. Any works proposed within waterfront land will be carried out in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land</i>. Abercrombie Creek intersects the Project area in the southeast. The closest Project infrastructure to Abercrombie Creek is WTG170, which is just over 100 m from the creek hydro line (from the anticipated area of disturbance [see below]).  The micro-siting corridor in this location is significantly closer to Abercrombie Creek; however, the Applicant will commit that no works will be undertaken within 40 m of Abercrombie Creek in this location, or elsewhere. According to the <i>Water Management (General) Regulation Hydro Line spatial data</i>, Abercrombie Creek is the only watercourse within the Project area that is considered a 'minor stream'. Notwithstanding, the Applicant has attempted to avoid impacting watercourses that traverse the Project area, particularly Abercrombie Creek. Other smaller, unnamed, ephemeral watercourses that traverse the Project area (generally 1st or 2nd Strahler stream order watercourses) have largely been avoided, except for in about six locations. At these six locations internal access tracks and electrical reticulation may cross these unnamed, ephemeral watercourses. These smaller, unnamed, ephemeral watercourses were observed as degraded, dried watercourses or drainage lines with no evidence of native fish, aquatic invertebrates or flora (s3.1.1.2 of the Amended Biodiversity Development Assessment Report [Appendix D of the Amendment Report]).	This table

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			Notwithstanding, and as necessary, any construction within 40 m of waterfront land will be undertaken in accordance with the <i>Guideline for Controlled Activities on Waterfront Land</i> and associated relevant guidelines, and the necessary approvals obtained. The Addendum to the Flood Impact Assessment (Appendix H of the Amendment Report) noted that no increases to erosion, siltation or bank instability are expected because of the Project.	
WG-04	Water Licensing	1.4 Recommendation – Post approval The proponent should ensure a water access licence (WAL) is obtained to account for the maximum predicted water take (if this is to occur – see recommendations 2.0) for construction and operation activities unless an exemption applies under the <i>Water Management (General) Regulation 2018</i>. Explanation: Under the <i>Water Management Act 2000</i>, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless exemption under Clause 7 of Schedule 4 of the <i>Water Management (General) Regulation 2018</i> 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: - o The water is not taken for consumption or supply; - o The person claiming the exemption keeps records of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and - o The records are kept for 5 years. Further information on these requirements and other information on licencing 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/licencing-and-trade A water supply work approval will also be required from the Licencing and Approvals team at NSW DCCEEW Water Group for any water take infrastructure, e.g., a pump or bore, where these have not been identified and assessed as part of the Project's SSD assessment.	Noted. The Project will take more than 3 ML of groundwater per year and, therefore, does not meet the requirements for an exemption under the <i>Water Management (General) Regulation 2025</i> (which supersedes the 2018 version). The Applicant will obtain the necessary WAL to account for the maximum predicted water take prior to the commencement of construction.	This table
WG-05	Groundwater	2.1 Recommendation – Pre-determination The proponent should obtain better groundwater level data to identify if project activities will breach the water table and to estimate the volume of water take due to aquifer interference activities. Explanation: Insufficient information has been provided to confirm potential groundwater impacts and estimations of inflow volumes. Water level depths from two bores over a large area is insufficient to categorise water table depths adequately and reliably. The proponent expects that the groundwater table is not likely to be breached as a maximum excavation depths for this Project are approximately 5 m. However, further evidence should be provided to confirm that the groundwater levels across the site will be deeper than maximum excavation depths. If groundwater is to be intercepted, the proponent needs to estimate the volume of groundwater take.	Noted. Section 6.8.2.2 of the EIS discussed existing groundwater bores within and adjacent to the Project area. Bores within the Project area have recorded groundwater at depths between 7.6 and 14 m below ground level (bgl). The Applicant understands that this is insufficient data to reliably state that no groundwater will be intercepted by excavation during construction of the Project. Section 3.3 of the Aquifer Interference Policy identifies activities such as trenching, access tracks, and building and work pads as activities defined as having minimal impact on water dependent assets. These activities cover most works associated with construction of the Project. Notwithstanding that available data suggests that groundwater is >7.6 m bgl, the Applicant will undertake a comprehensive groundwater investigation to inform the detailed design of the Project. This will ascertain true groundwater levels within the development footprint. If groundwater is recorded at depths that may be intercepted by excavation works, appropriate approvals will be obtained, or the design will be amended to avoid groundwater penetration.	This table
WG-06	Groundwater	2.2 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:	Noted. As stated, the Applicant will undertake a comprehensive groundwater investigation to inform the detailed design of the Project. This will ascertain true groundwater levels within the development footprint. If groundwater is recorded at depths that may be intercepted by	This table

Ref No.	Theme	Submission	Response	Where Addressed
		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: This 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 DCCEE Water Group notes that without reliable groundwater levels and take estimations it is difficult to assess the level of risk. Therefore, the proponent should reliably determine the estimated take volume.	excavation works, appropriate approvals will be obtained, or the design will be amended to avoid groundwater penetration. See response to WG-01. The Applicant estimates that up to 99 ML (66 ML/year for 18 months) of groundwater may be required to facilitate construction of the Project. This is the maximum amount and conservatively assumes that all construction non-potable water would come from groundwater. This is unlikely to be the case as discussed in the response to WG-01.	
WG-07	Water Utilities	3.1 Recommendation – Pre-determination The proponent should provide additional information about how water is to be sourced for the project and confirm any demands to be placed on the local water utility; specifically, the timing of when water will be required, the period potable water will be required. Explanation: The proponent's documentation indicates the requirements for water to support the construction activities and that water is to be sourced from local suppliers. However, there is insufficient information to confirm the ability to access this volume and determine any impact this may have on local water utility.	Noted. See response to WG-01. The Applicant is not relying on the local water utility to supply water demand for the Project. All water taken will be done so under the relevant approvals and licences. This will ensure that water taken is in accordance with the relevant WSPs.	This table
WG-08	Water Utilities	3.2 Recommendation – Pre-determination The proponent should detail the number of persons consuming the potable water to confirm that adequate volume has been estimated. Explanation: To ensure accurate estimations of potable water requirements the proponent should provide detail of the number of persons consuming potable water.	The Project EIS (ERM, 2024) states that a 650 full time equivalent (FTE) construction workforce will be required, with an average FTE of 450. These workforce numbers have not changed with the amended Project. Therefore, potable water estimates have been based on 450 average FTE consuming the water. The estimated 31 ML/year of potable water required for the construction period equates to a conservative estimate of about 150 L/person/day.	This table
WG-09	Water Utilities	3.3 Recommendation – Pre-determination The proponent should provide further detail on where wastewater will be received and whether it will have an impact on treatment facilities owned by the local water utility. Any proposal to use the water and wastewater services of the local water utility should be agreed to by the local water utility. Explanation: Table 6-102 refers to waste from septic tanks being transported to a licenced regulated waste receiver, it is unclear whether this will be a local water utility that can handle the additional demand, and what arrangements need to be undertaken and agreed to.	The Applicant intends to install septic tanks or pump out sewerage systems at the temporary workforce accommodation camp and at the operations and maintenance facility. Approval will be sought from Murray River Council for these in accordance with the <i>Local Government Act 1993</i>. During construction, wastewater (including sewage) will be carted to an appropriate treatment facility or facilities. The specific treatment facility or facilities to be used will be identified by the Applicant prior to the commencement of construction and the necessary agreements/contracts will be executed. The Applicant does not expect that upgrades to Murray River Council's existing treatment plants will be required to accommodate sewage disposal during construction of the Project; however, if this is not the case, the Applicant will engage with Murray River Council to find a solution or investigate other options to dispose of wastewater. These will be detailed in the Waste Management Plan that will be developed (and approved by the relevant authorities) prior to the commencement of construction of the Project.	This table



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ATTACHMENT A DPHI REQUEST FOR ADDITIONAL INFORMATION

Our ref: Keri Keri Wind Farm (SSD-38358962)

Mr Cairan Dillon
Project Coordinator

ACCIONA ENERGY AUSTRALIA GLOBAL PTY LTD
Level 38, 360 ELIZABETH STREET
MELBOURNE Victoria 3000
29 January 2026

Subject: Request for Additional Information

Dear Mr Dillon

I refer to Assessment for the Keri Keri Wind Farm (SSD-38358962). The department is requesting that you provide a response to the following agency advice:

- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on the Environmental Impact Statement, dated 28 June 2024.

You are requested to provide the information, or notification that the information will not be provided, to the department by Fri 27 March 2026. If you cannot meet this deadline or do not intend to provide the additional information, please advise the department via the NSW planning portal.

The assessment period ceases to run between the date of this letter and the date you provide the additional information (or notification that the information will not be provided), in accordance with Part 4 Division 4 of the Environmental Planning and Assessment Regulation 2021.

If you have any questions, please contact Rachel O'Hara on 9995 5081 or via email at rachel.ohara@dpie.nsw.gov.au.

Yours sincerely,



Nicole Brewer
Director
Energy Assessments

As delegate for the Planning Secretary