

Ref: D2017/19336

Nicole Brewer
Team Leader
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Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Brewer

Jupiter Windfarm – SSD 13-6277 – Review of EIS

WaterNSW appreciates the opportunity to provide comments on the Environmental Impact Statement (EIS) for the proposed construction and operation of the Jupiter Windfarm (SSD 13-6277).

It is noted that the site is located in the Sydney Drinking Water Catchment and falls under the State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011 (the SEPP).


WaterNSW has reviewed the EIS and undertaken a site inspection and has the following comments:

1. The EIS does not include a NorBE Assessment for the proposed development and how the proposed development will achieve a neutral or beneficial effect on water quality as required under clause 10 of the SEPP.
2. Water quality issues have not been adequately addressed in the EIS, including stormwater treatment and management from impervious areas during the operational stage of the proposed development. Clause 9 of the SEPP states that current recommended practices (CRPs) endorsed by WaterNSW should be applied. The CRPs are listed on the WaterNSW's website at <http://www.waternsw.com.au/water-quality/catchment/development>. WaterNSW considers the practices relevant to this project are those that address stormwater, on-site sewage management, and the construction of roads, access and services.
3. The erosion hazard in EIS is listed as low for the majority of the site. However there are a number of locations where the soils are dispersive and saline and in these locations the erosion hazard would be medium to high. There are large numbers of erosion control works including contour banks, concrete flumes, dams and fenced revegetation areas scattered throughout the project area.
4. The existing erosion control works provide an important role in mitigating the effects of erosion on the site and therefore protecting water quality. Measures to protect these erosion control works should be proposed and implemented in the management plans. This is especially important given that the soils on the site can have high salinity and be highly sodic. If any erosion control works are damaged or removed during construction, those works should be repaired or replaced.

5. Not all watercourse crossings are identified in the EIS. Some of the watercourse crossings will require major construction whilst some of the proposed watercourse crossings require relocation as there are better places to cross. The access road into the southern precinct is 3.5km long and will require a major upgrade. There is erosion on the existing road.
6. Other Comments
 - a. Annex I, Section 6.3 - There is no information given under the heading "*Design ARIs and Calculation of Peak Flows for Control Devices*"
 - b. The Sydney Catchment Authority became Water NSW and is not part of DPI Water as is noted in a number of locations in the EIS.
 - c. Some of the documents noted in the EIS are not WaterNSW's CRPs.

WaterNSW will further consider the application following a response to the above comments. If you wish to discuss any matter raised in this letter please do not hesitate to contact Jim Caddey on 4824 3401 or james.caddey@waternsw.com.au

Yours sincerely



MALCOLM HUGHES
Manager Catchment Protection

15/2/17