

Ref:D2016/124656

Elle Donnelley
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Donnelley

Crookwell 3 Windfarm – SSD-6695 (MP 10_0034)

WaterNSW appreciates the opportunity to provide comment on the Addendum to the Environmental Impact Statement (EIS) for the amendment to the development application for the proposed construction and operation of the Crookwell 3 Windfarm (SSD-6695, MP 10_0034). The amendment seeks to decrease the number of turbines and associated towers from 29 to 23.

It is noted that the site is located at the north extremity of the Wollondilly River catchment which is part of the Sydney Drinking Water Catchment, and so comes under the SEPP (Sydney Drinking Water Catchment) 2011 (the SEPP). Therefore the Project must be constructed and operated to ensure a neutral or beneficial effect on water quality. It is noted that the SEPP is not mentioned in the Addendum to the EIS.

Clause 9 of the SEPP specifies that any development or activity proposed to be carried out on the land to which the SEPP applies should incorporate WaterNSW's current recommended practices (CRPs), listed on the WaterNSW website. WaterNSW considers the CRPs that address stormwater, on-site sewage management and the construction of roads and access should be utilised for this project.

WaterNSW notes there are existing erosion control works located on the property, including contour banks, dams and revegetation areas. These 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 shall need to be proposed and implemented. This is especially important given that the soils on the property can have high salinity and be highly sodic.

The Department's draft recommended conditions require the applicant to consult with WaterNSW, then the Sydney Catchment Authority, in the preparation of Soil and Water Quality Management Plan. The addendum EIS for the amendment states that an Environmental Management Plan (EMP), incorporating Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP) will be prepared. WaterNSW requests the Department to amend some of the draft recommended conditions as follows:

- Schedule E, Condition E25(g) and throughout the draft conditions – Replace 'SCA' with 'WaterNSW'.
- Schedule E, Condition E25(g) - Construction Soil and Water Quality Management Plan be prepared in accordance with the following documents:
 - Managing Urban Stormwater: Soils and Construction Vol 1 4th edition (Landcom, 2004 – the 'Blue Book Vol.1'), and

- Managing Urban Stormwater: Soils and Construction Volume 2A Installation of Services and Volume 2C Unsealed Roads (DECC, 2007 – the 'Blue Book Vol.2').
- Schedule F, Condition F20 - require Water NSW be consulted in the preparation of the plan
- Schedule F, Condition F20 – include the protection of existing erosion control works on the land.

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 Environment and Planning

15/11/16