



OUT20/14739

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Dear Mr Ko

### **Hills of Gold Wind Farm (SSD 9679) - EIS Exhibition**

I refer to your email of 26 November 2020 to the Department of Planning, Industry and Environment (DPIE) – Water and the Natural Resources Access Regulator (NRAR) about the above matter. The following recommendations are provided by DPIE Water and NRAR.

#### **Pre-approval recommendation**

The proponent must:

- Confirm access to a secure water supply for the project.
  - Comments: Insufficient information has been provided to confirm access to a secure water supply for this project. Options to source the required 55ML/yr of water over 24 months for the project's construction have been proposed, however uncertainty exists in the ability to obtain the necessary water supply from these sources. This is a potential commercial risk for the project.

**Note** - further specific comments on the uncertainty regarding the various water supply sources and relevant requirements and considerations are provided in **Attachment A**.

#### **Post approval recommendations**

The proponent must:

- Obtain relevant approvals and licences under the *Water Management Act 2000* before commencing any works which intercept or extract groundwater or surface water (unless an exemption applies).
- Ensure that relevant nomination of work dealing applications for Water Access Licences proposed to account for water take by the project have been completed prior to the water take occurring.
- Comply with the rules of the relevant water sharing plans.
- Prepare a Construction and Operational Environmental Management Plan (incorporating an Erosion and Sediment Control Plan) prior to commencement of activities.
  - Comment: The commitment made to prepare a Soil and Water Management Plan and an Erosion and Sediment Control Plan is supported, and it is recommended this be developed in accordance with industry standards including the guideline, Managing Urban Stormwater: Soils and Construction (Landcom 2004).



- Ensure that works within waterfront land are in accordance with the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018).
- Comment: The proposed watercourse crossing upgrades and new installations will need to be designed and constructed in accordance with this guideline.

Yours sincerely

Liz Rogers  
Manager, Assessments  
**DPIE Water – Strategic Relations**  
25 February 2021

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**Pre-approval recommendation - Confirm access to a secure water supply for the project.**

Further comment on the uncertainty that exists in the ability to obtain the necessary water supply for the project from various sources is as follows:

- Whilst Council has indicated the ability for the proponent to purchase water, it is understood this is not the preferred option for the project due to the associated cost and transport requirements. The ability of Council to supply the necessary volumes in a potential drought scenario may also be limited.
- In terms of accessing existing or new bores, no assessment has been provided of individual bores to confirm a water supply is available and that any impacts are within standard assessment criteria. Whilst it is recognised the groundwater source may be able to meet some of the demands from the project, uncertainty remains until a bore is installed and assessed for yield, quality and impacts.

The proponent will need to provide an assessment of the assessment criteria before approval of water take can occur. A Fact Sheet on 'Assessing groundwater applications' can be found at:

[https://www.industry.nsw.gov.au/\\_data/assets/pdf\\_file/0008/175931/Assessing-groundwater-applications-fact-sheet.pdf](https://www.industry.nsw.gov.au/_data/assets/pdf_file/0008/175931/Assessing-groundwater-applications-fact-sheet.pdf)

- As the EIS has not presented against these impact criteria, nor nominated a site from which the bore(s) would be located, DPIE Water cannot complete its own groundwater impact assessment.
- If new bores or pumps are proposed, it is recommended their installation and operation be assessed as part of the SSD assessment process to identify the application and approval requirements for any necessary water access licence(s) under the *Water Management Act 2000*.
- Additionally, DPIE Water and NRAR note that whilst groundwater interception is unlikely due to the project, if groundwater is to be intercepted the proponent must obtain the relevant entitlement and approval where required prior to any extraction or interception.
- The availability of water in farm dams has not been assessed to meet the projects requirements.
- Accessing water from a new extraction point on the unregulated Peel River will require specific assessments based on the proposed point of extraction and the relevant trading rules of the Water Sharing Plan. Securing sufficient entitlement in the unregulated Chaffey Water Source may also be challenging considering there is less than 400ML of issued entitlement. This is yet to be addressed by the project.