

3 September 2020

Contact: *Alison Kniha*

Telephone: *02 9865 2405*

Our ref: *D2020/89448*

Natasha Homsey  
Industry Assessments  
Department of Planning, Industry and Environment  
320 Pitt Street  
SYDNEY NSW 2001

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Dear Ms Homsey

**RE: SSD-10460 – Hume Battery Energy Storage System EIS Exhibition**

I refer to your email dated 6 August 2020 requesting WaterNSW's comments on the above Environmental Impact Statement (EIS) for the Hume Battery Energy Storage System (Hume BESS). WaterNSW understands the proposal involves the construction of the BESS, works on the access track, underground cabling infrastructure, switchyard upgrades and fencing.

The proposed site is located alongside the existing Hume Power Station on WaterNSW land at Hume Dam, which is managed by WaterNSW.

Meridian has a licence in place allowing the development of the Hume BESS project on the site and a variation to the existing Lease agreement is currently being negotiated with WaterNSW.

WaterNSW previously provided landowner's consent for the proponent, Meridian Energy Australia Pty Ltd, to lodge and submit documentation relating to the proposal, including the EIS (our ref: D2020/70359).

WaterNSW has now reviewed the EIS and provides the following comments and requested conditions:

***Hydrology and stormwater management***

The EIS (p. xx) notes that the location of the project area downstream of the Hume Dam and Lake Hume Reservoir means it would not result in any impacts to the hydrology and water quality within the dam. However, WaterNSW notes there is a drainage line from the project area flowing to the south-west, which is identified on Figure 7-1 (p.50) and DWG S1 (TGA Engineers; Rev 0; dated 26/06/20) of the Design Drawings in Appendix C.

The location of the drainage line, its proposed modification (including a culvert and armouring), and its incorporation into the stormwater management for the project area, may result in impacts to the identified terrestrial wetland on WaterNSW land into which it drains. WaterNSW understands, through consultation with Meridian, that the Design Drawings are preliminary and a detailed design, including for soil and water management, will developed.

In order to prevent impacts to the wetland and water quality leaving the site during construction and facility operation, the stormwater flows from the project site post-development must not be greater than pre-development. The direct and indirect impacts on the catchment area, including

changes to the pervious area as a result of the project (including the proposed access road) must be taken into account. Appropriate and adequate stormwater management measures and erosion and sediment controls must be incorporated to ensure water quality is also not impacted.

Requested Conditions:

- *Post-development stormwater flows must not exceed pre-development flows, for both water quality and quantity.*
- *A Soil and Water Management Plan (SWMP) must be developed and approved by WaterNSW before commencement of establishment or construction works. The SWMP must include controls for all aspects of the project, including the proposed access road, stockpile site, batters, and trenching to the switchyard, as well as the battery site.*
- *Erosion and sediment controls must be installed before works commence, and be retained and maintained until groundcover is re-established and the surface stabilised.*
- *Stockpiles must be stabilised with runoff directed to an appropriately sized sediment basin established before construction works commence.*
- *Appropriate and adequate dust suppression measures must be undertaken to prevent dust blowing from the project site.*
- *Upon completion of construction, the proposed sediment basin must be converted to a bioretention basin with an agreed maintenance plan in place.*
- *The access track must be upgraded according to DECCW's Unsealed Roads Manual (Blue Book Vol 2C) – and Unsealed Roads Best Practice Guide (ARRB, 2020)*

**Soil and Water Contamination**

Although the EIS states that there is nothing to indicate the site is unsuitable, the extent and type of past construction practices may have impacted the broader Hume Dam site, potentially leading to soil contamination. WaterNSW notes the EIS (s. 3.11, p.33) commits to undertake notification under Section 60 of the *Contaminated Lands Management Act 1997* should any site contamination be identified. WaterNSW requests that the preparation of an Environmental Management Plan include an unexpected finds protocol, which includes notification to WaterNSW.

Requested Conditions:

- *The BESS compound must be bunded to ensure chemical or fuel leaks or spills are fully contained.*
- *Chemicals, fuels and lubricants must be securely stored in approved containers and clear of the identified drainage line.*
- *A spill kit must be immediately available to all site workers where refuelling of equipment is undertaken.*
- *Refuelling must occur at the designated workshop area or compound area.*
- *All equipment, vehicles and machinery must be cleaned before entering the project site, including tyres, boots and blades/buckets.*
- *All staff and contractors must use the existing facilities or otherwise provide a porta-loo to be removed at the conclusion of construction.*
- *Any waste generated must be removed from the site and disposed of at a facility licenced to accept such waste.*
- *All incidents, including spills, accidents and unexpected finds must be immediately reported on WaterNSW's Incident Notification Number 1800 061 069 (24 hour service).*

### **Traffic management**

The EIS (p. 72) acknowledges the need to prepare a traffic management plan for the internal access in consultation with WaterNSW. The Plan should include the likely construction and operational interactions between the project and existing and proposed WaterNSW infrastructure and land at and in the vicinity of the site and the mitigation measures proposed to address the impacts.

#### Requested Condition:

- *The proponent must consult with WaterNSW to develop an internal traffic management plan to the satisfaction of WaterNSW.*

### **Heritage, vibration and construction risks**

The EIS acknowledges the potential for impacts on WaterNSW assets, s. 170-listed and other heritage artefacts from the proposed electricity cabling infrastructure installation (s. 12; p. 81). The potential impacts are primarily related to vibration caused by the machinery used for trenching for the cabling, although the design allows for a 10m buffer between the trench and the Nissen huts.

WaterNSW understand that a Construction Environmental Management Plan (CEMP) will be prepared for the project. WaterNSW request to review the draft plan to ensure appropriate safeguards are incorporated into the construction methodology, including stormwater, erosion and sediment controls, vibration, dust, and traffic management.

#### Requested Condition:

- *The proponent shall implement all practical measures to prevent damage to WaterNSW assets that may result from construction or operation of the project.*
- *The proponent shall repair, or pay all reasonable costs associated with repairing any damaged WaterNSW assets in a timely manner and to the satisfaction of WaterNSW.*
- *Trenching and laying of cabling is to occur in a manner to avoid all culverts with identified heritage value.*
- *If any Aboriginal or European cultural heritage site or artefact (as defined by the National Parks and Wildlife Act 1974 or Heritage Act 1977) is identified during the Approved Activity and does not already have an appropriate heritage plan that is being implemented, the Applicant's employees, contractors and/or contractors must Stop Work immediately at the location and ensure no further harm to the object. The Consent Holder must immediately report the find to Water NSW via the Incident Notification Number **1800 061 069**, and report to the regulator in accordance with legislation. The approved activity must not commence in the vicinity of the find until any required approvals have been granted by the regulator. In the event that skeletal remains are encountered, the area must be secured to prevent unauthorised access and the Consent Holder must immediately contact NSW Police and Water NSW.*
- *Prior to finalising the Construction Environmental Management Plan (CEMP), the Applicant must consult with WaterNSW. The plan must include detailed procedures for managing the environmental impacts of construction.*

### **Biodiversity**

WaterNSW notes the EIS includes an assessment of the existing environment with regards to biodiversity values. We note from the Design Drawings in Appendix C that the proposed access track will directly impact at least one large tree and includes proposed modifications of the drainage line feeding the River Red Gum wetland identified on Figure 7-1.

Requested Conditions:

- *Direct impact to any hollow bearing trees must be avoided.*
- *The proposed access track must be located and constructed to minimise impacts on the native vegetation and changes to the drainage and movement of fauna to the wetland.*
- *Existing Squirrel Glider nesting boxes that are directly impacted by the project must be relocated to appropriate locations, and measures undertaken to minimise disturbance or damage to others.*

If you have any questions regarding this letter, please contact Alison Kniha at [alison.kniha@waternsw.com.au](mailto:alison.kniha@waternsw.com.au).

Yours sincerely,

A handwritten signature in black ink that reads "Clay Preshaw". The signature is written in a cursive, slightly slanted style.

**CLAY PRESHAW**  
**Manager Catchment Protection**