



Your ref: SSD-87041214
Our ref: DOC26/210268-2

Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Ms Pragya Mathema

Dear Ms Mathema

Re: Request for advice - Corowa Battery Energy Storage System EIS – SSD-87041214

Thank you for your email dated 13 April 2026 seeking advice from the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) on the Environmental Impact Statement (EIS) for the Corowa Battery Energy Storage System (BESS) project.

We have reviewed the exhibited EIS against the Secretary's Environmental Assessment Requirements (SEARs) provided by the Department of Planning, Housing and Infrastructure to the proponent on 23 July 2025.

We consider the EIS meets the Secretary's requirements for flooding contingent on the applicant addressing issues 1 to 5 identified in **Attachment A**.

We consider the EIS does not meet the Secretary's requirements for biodiversity, as the Biodiversity Development Assessment Report (BDAR) submitted with the EIS was not certified by the Accredited Assessor within 14 days of lodgement. Further information is provided in **Attachment A**. CPHR raises no other issues with the biodiversity assessment.

All plans required as a Condition of Approval that relate to biodiversity or flood risk management should be developed in consultation with, and to the satisfaction of, CPHR.

If you have any questions about this advice, please do not hesitate to contact the Planning Coordination and Advice team at pca@dcceew.nsw.gov.au

Yours sincerely

STACY WARREN
Senior Manager – Conservation Planning and Assessment
Conservation Programs, Heritage and Regulation Group

12 May 2026

ATTACHMENT A CPHR Assessment Summary for Corowa BESS Environmental Impact Statement (SSD-87041214)

ATTACHMENT A CPHR Detailed comments for Corowa BESS Environmental Impact Statement (SSD-87041214) – Flooding and Biodiversity

Flooding

CPHR has reviewed the flood risk management component in Section 6.8 of the EIS and Appendix E14, Hydrological Investigation Report - Corowa BESS (HIR), prepared by Fyfe (March 2026).

The EIS addresses the Secretary’s requirements for flood risk management, contingent on the proponent addressing the issues listed below during the detailed design phase of the project.

To fully address the SEARs for flood risk management, as issued in our advice dated 11 July 2025, the proponent should address the following deficiencies during the detailed design phase of the project:

CPHR Flooding Issue 1	The hydraulic model post-development condition is largely conceptual.
Comments	The representation of post-development conditions in the hydraulic model is achieved through elevation and roughness adjustments to the model terrain. This approach provides only a preliminary assessment of flood risk and impact. CPHR acknowledges that a final assessment of post-development conditions cannot be undertaken until the project reaches the detailed design stage. It is therefore recommended that future hydraulic modelling incorporates the detailed design of the project infrastructure to accurately reflect the project’s impact on flood behaviour and to inform the detailed design process, ensuring that potential impacts are minimised or avoided.
Recommendation	1.1 Update the hydraulic model to incorporate the detailed design of the proposed development, including all ancillary infrastructure and works.

CPHR Flooding Issue 2	The Probable Maximum Flood (PMF) event has not been modelled.
Comments	As stated in the SEARs letter dated 11 July 2025, CPHR requires the proponent to model the PMF, or an equivalent extreme event. CPHR recommends that the proponent model the local overland PMF consistent with the modelling undertaken in the HIR. The impact of the riverine PMF event on the subject site can be derived from the <i>Corowa, Howlong and Mulwala Flood Study</i> (WMAwater, 2024). Given the magnitude of the riverine PMF event, it is reasonable to suggest that the proposed development is unlikely to lead to detrimental off-site impacts during a riverine PMF event. However, consideration should be given to ensuring that any sensitive infrastructure, such as inverters and batteries, is elevated to a level that provides immunity from the riverine PMF event, where practicable.
Recommendation	2.1 Complete additional modelling to assess the impact of the local overland PMF event on the site, and the impact of the post-development conditions on flood behaviour.

CPHR Flooding Issue 3	The assessment of off-site flood affectation is incomplete.
Comments	The HIR includes afflux mapping for the 1% AEP event, which indicates no change in flood depth off-site. However, afflux mapping is not provided for the climate change scenario modelled (SSP3-7.0 2090) or the local overland PMF. The proponent should conduct further assessment to accurately define off-site impacts in the additional design flood events. CPHR notes that a dwelling and ancillary infrastructure are located in proximity (northwest) of the development site. Any identified detrimental impacts to off-site properties and/or assets must be adequately mitigated.
Recommendations	3.1. Conduct further assessment to define any detrimental increases in flood affectation of off-site properties and/or assets. 3.2. Where detrimental increases in flood affectation are identified, the proponent must mitigate the risk.

CPHR Flooding Issue 4	Flood hazard and hydraulic (function) categories have not been mapped.
Comments	CPHR requires the mapping of the flood hazard and function categories and demonstration of the project's compatibility with these constraints. The mapping of flood hazard and function categories for both the existing and post-development scenarios is not provided as part of the local overland modelling undertaken in the HIR.
Recommendation	4.1. Define and map the local overland flood hazard and function categories for both the existing and post-development scenarios to demonstrate the project is compatible with the constraints of the land.

CPHR Flooding Issue 5	There is no evidence that emergency management matters have been discussed with the Federation Council and/or NSW State Emergency Services (SES).
Comments	CPHR acknowledges that during operation few full-time staff are to be located on site, so the flood risk posed to life is minimal. However, it is necessary that emergency management, access, and contingency measures are adequately considered. As stated in our SEARs letter dated 11 July 2025 these matters must be discussed with, and have the support of, the Federation Council and NSW SES.
Recommendation	5.1 Actively engage with the Federation Council and NSW SES to demonstrate that emergency management matters have been discussed and, where applicable, supported.

Biodiversity

The Biodiversity Development Assessment Report (BDAR) (NGH, dated 16 January 2026) at Appendix E.1 of the EIS does not meet the Secretary's requirements for biodiversity.

CPHR Biodiversity Issue 1	The BDAR certification does not meet the <i>Biodiversity Conservation Act 2016</i> requirements
Comments	Section 6.15(1) of the <i>Biodiversity Conservation Act 2016</i> (BC Act) states that: <i>'A biodiversity assessment report cannot be submitted in connection with a relevant application unless the accredited person certifies in the report that the report has been prepared on the basis of the requirements of (and information provided under) the biodiversity assessment method as at a specified date and that the date is within 14 days of the date that the report is so submitted.'</i> The currency of the BDAR is important to ensure the most relevant biodiversity updates have been included for the proposal. The BDAR and associated BAM-Calculator case are dated 16 January 2026. The EIS is dated 6 March 2026 and was submitted 10 March 2026. As such, the current BDAR does not accord with s 6.15(1) of the BC Act.
Recommendation	The BDAR be re-certified by the assessor and lodged in support of the state significant development application within 14 days of the credit calculations being finalised.