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26/09/2024

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Subject: **Beryl Battery Energy Storage System (SSD-50505215) - Environmental Impact Statement**

Dear Ms Ramsdale,

I refer to your request for advice sent on 26 August 2024 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

Ratch-Australia Corporation (RAC) is proposing a capacity of up to 100 megawatts (MW)/200 megawatt hours (MWh) and would connect to the grid via an underground cable to the existing Transgrid managed Beryl Substation. When connected, the Project would store energy during periods of low demand and release it during peak demand, providing network stability and grid forming capabilities.

NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and has recommendations regarding water supply, take, licensing and guidelines for controlled activities on waterfront land. Please see **Attachment A** for more detail.

Should you have any further queries in relation to this submission please do not hesitate to contact Water Assessments [water.assessments@dpie.nsw.gov.au](mailto:water.assessments@dpie.nsw.gov.au).

Yours sincerely

**CBrooke**

Cherelle Brooke,  
A/Manager, Water Assessments, Knowledge Division  
**NSW Department of Climate Change, Energy, the Environment and Water**

## Attachment A

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# Detailed advice to DPHI Planning regarding the Beryl Battery Energy Storage System (SSD-50505215) – Environmental Impact Statement

## 1.0 Water supply, take and licensing

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### 1.1 Recommendation – pre-determination

Clarification be provided on the ability to obtain a secure water supply for the project. This is to include the confirmation of relevant agreements where required.

#### Explanation

Water trucked in from a commercial water provider is the proponent's preferred option to meet the Project's water demands (maximum demand being 10 ML/year during the construction phase). Confirmation of an agreement with a commercial water provider will demonstrate that the project's water demands can be met using this option, and that alternative water supply arrangements which may need to be licensed under the Water Management Act 2000 are not required for the project.

### 1.2 Recommendation – post approval

If groundwater will be intercepted during the construction phase of the project, a Water Access Licence (WAL) with sufficient entitlement to account for the groundwater take must be obtained, unless an exemption applies under the Water Management (General) Regulation 2018

A water supply work approval will also be required from DCCEEW Water for any water take infrastructure, e.g., a pump or bore, where these have not been identified and assessed as part of the project's SSD assessment.

#### Explanation

The project will require excavations below existing surface levels to establish suitable foundations for infrastructure, and for the installation of underground services. It is noted that the project's excavations would be shallow (up to a maximum of a few metres in depth) and that groundwater is not expected to be intercepted by these excavations. However, due to the lack of groundwater data that is available to review for the project, it is not certain that aquifer interception won't occur due to the project's excavations. Therefore it is recommended that the proponent should identify both excavation and water table depths to confirm this.

Under the *Water Management Act 2000*, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under Clause 7 of Schedule 4 of the Water Management (General) Regulation 2018 applies. An exemption may be available if water take is less than or equal to 3 ML per water year, subject to the development meeting other exemption requirements, such as:

- the water is not taken for consumption or supply;
- the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and
- the records are kept for 5 years.

Further information on these requirements and other information on licensing and approvals, exemptions, including an exemption application form and a form to report and record water taken can be found at:

<https://water.dpie.nsw.gov.au/licensing-and-trade>

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## **2.0 Guidelines for controlled activities on waterfront land**

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### **2.1 Recommendation – post approval**

All of the project's works located on waterfront land, as described in the project's EIS, are to be consistent with all of the relevant guidelines for controlled activities on waterfront land, available at: <https://water.dpie.nsw.gov.au/licensing-and-trade/controlled-activity-approvals/guidelines>

#### **Explanation**

The Proponent proposes to divert/realign two 1st order watercourses around Project infrastructure. Realignment of these 1st order watercourses is acceptable where works are designed and constructed in accordance with the Guidelines for Controlled Activities, particularly the guideline for instream works on waterfront land.

**End Attachment A**

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