



Your ref: SSD-67105475

Our ref: DOC25-436371

Sam Wynn
Principal Planning Officer
Department of Planning, Housing and Infrastructure – NSW Planning Group
Via Major Projects Portal: PAE-85197459

Dear Sam

Subject: Request for Secretary's Environmental Assessment Requirements – Romani Solar Farm (Amended for BESS), SSD-67105475

Thank you for your email dated 30 May 2025 seeking advice from the Regional Delivery Division (RD) of the NSW Department of Climate Change, Energy, the Environment and Water about the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the amended project comprising only a Battery Energy Storage System (BESS).

RD has reviewed the information supplied. The relevant documents reviewed are:

- Draft SEARS (May 2025), DPHI
- Romani BESS Scoping Report, ERM 15 May 2025
- Romani Solar Farm Land Category Assessment Report, ERM 2024
- Environmental Impact Statement - The Plains Wind Farm – Appendix M Flooding, Lyall and Associates, March 2024.

RD considers that the SEARs we provided on 13 February 2024 remain relevant for the proposed BESS. We recommend the SEARs remain unchanged regarding the assessment of biodiversity and flood impacts.

RD recommends the EIS appropriately address the following:

1. Biodiversity
2. Flood risk management

The EIS should fully describe the proposal, the existing environment, and impacts of the development that may impact flooding and biodiversity. It is important that all conclusions are supported by adequate data. The assessment must include all ancillary infrastructure associated with the project such as roads, water and power supplies, and Rural Fire Service requirements for asset protection.

Biodiversity

Minimum requirements for the biodiversity assessment are listed in Appendix K of the Biodiversity Assessment Method (BAM). Minimum spatial data requirements for the Biodiversity Development Assessment Report (BDAR) submission are listed in Appendix D (Table 7) of the BAM Stage 2 Operational Manual. The Accredited Assessor preparing the BDAR should follow the BDAR template. All spatial data relevant to the BDAR should be uploaded to the Biodiversity Offsets and Agreements Management System (BOAMS) when finalising the case.

Given the proportion of land already cleared in the surrounding region, the proponents must set out how impacts to biodiversity will be avoided and minimised. The cumulative impact of electricity

generation in the surrounding region should be assessed through application of the Cumulative Impact Assessment Guidelines for State Significant Projects.

The EIS should identify any relevant Matters of National Environmental Significance, and whether the proposal has been referred to the Australian Government or whether it is already determined to be a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999*.

Flood Risk Management

The Scoping Report indicates the project site is located approximately one kilometre north of the ephemeral Forest Creek in the broader Murrumbidgee River floodplain. The area is dominated by topography of low relief resulting in a network of ephemeral flow paths dividing the landscape.

Flooding at the site is most likely to occur from local intense rainfall events activating the ephemeral flow paths during major overland flow flood events. These flow paths may also be activated during major riverine flood events in the Murrumbidgee River.

Lyll and Associates (2024) found the subject area for the adjacent SSD-50629707 (The Plains Wind Farm) is prone to flooding when breakouts from the Murrumbidgee River develop during major flood events. Modelling suggests much of the proposed BESS site may be inundated to depths up to one metre during an extreme Murrumbidgee River flood event.

Given the likely flood risks for the proposed BESS site, RD recommends the proponent prepare a robust Flood Impact Risk Assessment (FIRA) investigating both major overland flow and riverine flooding. The FIRA should address the flood risk management requirements in Attachment A of the SEARs issued by RD on 13 February 2024 and conduct flood modelling to define the impact of flood events on the proposed development, and the impact of the proposed development on flood behaviour. The FIRA should be prepared in accordance with the *NSW Flood Risk Management Manual* (DPE 2023).

If you have any questions about this advice, please contact Marcus Wright, Senior Conservation Planning Officer, via planning.southwest@environment.nsw.gov.au or 02 6938 4917.

Yours sincerely



Adam Vey
10th June 2025

**Director, South West
Regional Delivery
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