

Our ref: OUT25/14157

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19/11/2025

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Subject: Romani Battery Energy Storage System (SSD-67105475) – Environmental Impact Statement

Dear Nicholas Kumar,

I refer to your request for advice sent on 27 October 2025 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

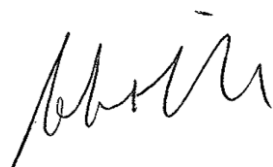
NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and makes recommendations to:

- Clarify the ability to obtain a secure water supply for the project. Should this require a groundwater bore, an assessment is required to confirm the necessary yields and water quality and impacts to water users and the environment.
- Ensure sufficient entitlement in a water access licence is held unless an exemption applies.

Please see Attachment A for further detail.

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

Yours sincerely



Rob Brownbill,  
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 & Assessment regarding the Romani BESS (SSD-67105474) – EIS

#### 1.0 Water supply, take and licensing

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##### 1.1 Recommendation – pre-determination

That Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to clarify the ability to obtain a secure water supply for the project. This should include confirmation of consultation with third parties where required and demonstrate sufficient water entitlements can be acquired where necessary.

##### Explanation

Insufficient information has been provided to confirm access to a secure water supply for the water demands for the project's construction and operation. The Surface Water Impact Assessment (Appendix O) proposes a range of options however uncertainty exists in the ability to obtain the necessary water supply from these sources. It is recognised the main EIS document states Edward River Council can provide potable water, however there is no confirmation of the ability to source the non-potable demands.

##### 1.2 Recommendation – pre-determination

That DPHI requests the proponent to clarify the requirement for a bore to meet water supply demands for the project. If required, an impact assessment of the bore's construction and operation against DCCEE Water impact assessment criteria is requested. The appropriate criteria are available at:

[https://publications.water.nsw.gov.au/watergroupjspui/bitstream/100/772/1/Groundwater\\_impact\\_assessment\\_criteria.pdf](https://publications.water.nsw.gov.au/watergroupjspui/bitstream/100/772/1/Groundwater_impact_assessment_criteria.pdf)

##### Explanation

The Surface Water Impact Assessment (Appendix O) states that although groundwater extraction is not currently proposed, it may be considered during detailed design. DCCEE Water recommends the water supply sources and extraction works be confirmed at the EIS stage and the associated impacts identified and assessed. This is to confirm the availability of a water supply and to enable the bore to be excluded from the requirement for a water supply work approval under the *Water Management Act 2000* due to exclusion provisions under section 4.41 of the *Environmental Planning and Assessment Act 1979*.

##### 1.3 Recommendation – post-determination

That DPHI requests the proponent to obtain sufficient water entitlement in a water access licence (WAL) to account for the maximum predicted water take from each water source prior to take occurring unless an exemption applies.

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## Explanation

The proponent must ensure sufficient entitlement is held to account for maximum take due to the project, this would include to meet site water demands or in the unlikely event that groundwater is intercepted during infrastructure footing construction. Should groundwater interception occur due to footing construction the proponent can consider the exemption from a WAL outlined in Section 19 Schedule 4 of the Water Management (General) Regulations 2025. For more information visit <https://www.water.dcceew.nsw.gov.au/our-work/licensing-and-approvals/water-licence-and-approval-exemptions>

End Attachment A