



Your ref: SSD-77238990

Our ref: DOC25/944693

Nicholas Kumar
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure - NSW Planning Group
Via Major Projects Portal: PAE-98480982

Dear Nicholas

Subject: South Coree BESS (SSD-77238990)

Thank you for your email dated 5 November 2025 seeking advice from the Regional Delivery (RD) of the NSW Department of Climate Change, Energy, the Environment and Water about the Environmental Impact Statement (EIS).

We have reviewed the exhibited EIS against the Secretary's Environmental Assessment Requirements (SEARs) issued to the proponent on 7 November 2024.

RD considers the EIS does meet the Secretary's requirements for flood risk management, contingent on the proponent addressing issues 1 and 2 identified in **Attachment A and B**.

RD considers that further work is required on the Biodiversity Development Assessment Report (BDAR) to meet the SEARs for biodiversity, however the issues identified are minor and can be addressed without further surveys.

The key issues identified are:

- The assessment of flood risk is largely conceptual and does not consider the impact of flooding on the proposed development. The detailed design should be incorporated into the hydraulic model to accurately investigate flood behaviour
- Additional evidence for exclusion of predicted and candidate species is required
- Indirect and prescribed impacts of the proposed 132 kV transmission line and appropriate mitigation measures have not been included in the BDAR.

These matters will need to be addressed to ensure the final BDAR complies with the Biodiversity Assessment Method (BAM).

A summary of our assessment and advice is provided in **Attachment A**. Detailed advice is in **Attachment B**.

All plans required as a Condition of Approval that relate to flood risk management or biodiversity should be developed in consultation with RD, so our issues are adequately addressed.

If you have any questions about this advice, please contact Giorginna Xu, Senior Conservation Planning Officer, via planning.southwest@dcceew.nsw.gov.au or (02) 4927 3185.

Yours sincerely



Helen Waudby

4 December 2025

Acting Director, South West

Regional Delivery

Conservation Programs, Heritage and Regulation Group

NSW Department of Climate Change, Energy, the Environment and Water

ATTACHMENT A – RD Assessment Summary for South Coree BESS Environmental Impact Statement (SSD-77238990)

ATTACHMENT B – Detailed advice for South Coree BESS Environmental Impact Statement (SSD-77238990)

ATTACHMENT A RD Assessment Summary for South Coree BESS Environmental Impact Statement (SSD 77238990)

Key Issues

The following issues and recommendation are to be resolved prior to determination.

Flood Risk Management

1. The FIA hydraulic model should be updated with the detailed design to accurately investigate flood behaviour

- 1.1. Incorporate the detailed design of the project into the hydraulic model to accurately investigate the impact of flooding on the proposed development.

2. Flood risk mitigation measures require finalisation

- 2.1. Finalise flood risk mitigation measures with a sufficient level of detail and justification for implementation.
- 2.2. Finalise the FIA, and future Flood Emergency Response Plan, in accordance with the recommendations provided by the NSW SES.

Biodiversity

RD has reviewed the BDAR at Appendix F.1 of the EIS, prepared by NGH Pty Ltd (September 2025) and BOAMS case number 00050419. Specific advice on the BDAR and related sections in the EIS are identified below.

- 3.1. Revise all predicted credit species removed from further assessment in accordance with Section 5.2.2(2) of the BAM. Update relevant sections of the BDAR, including Table 10, and BAM-C to include any species identified as requiring assessment.
- 4.1. Provide additional evidence to demonstrate how the presence of Sloane's Froglet was excluded.
- 5.1. Revise the mitigation measures outlined in Table 8.5 of the BDAR and in the BMP to include:
- 6.1. Amend the BDAR to include an assessment of indirect and prescribed impacts for the proposed 132 kV transmission line and appropriate mitigation measures.

ATTACHMENT B Detailed advice for South Coree BESS Environmental Impact Statement (SSD-77238990)

Flood Risk Management

RD has reviewed the flood risk management assessment at Section 6.7 of the EIS and Appendix F.8 – Flood Impact Assessment (FIA) (Cumulus Engineering 2025).

The EIS does address 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.

1. The FIA hydraulic model should be updated with the detailed design to accurately investigate flood behaviour

The assessment of flood risk presented in the FIA is largely conceptual and fails to consider the impact of flooding on the proposed development. The proposed development design conditions have merely been represented by blocking the entire BESS site in the hydraulic model. RD acknowledges that this is a conservative approach for assessing the impact of the proposed development, however this does not accurately represent flood behaviour. Importantly, the approach does not assess the impact of flooding on the proposed development in events that will inundate the project site.

RD recommends that once finalised, the detailed design be incorporated into the hydraulic model to accurately investigate flood behaviour. The outcomes of the additional modelling should be documented in an updated FIA and confirm that flood risk has not increased or changed significantly because of incorporating the detailed design.

Recommendations:

- 1.1. Incorporate the detailed design of the project into the hydraulic model to accurately investigate the impact of flooding on the proposed development.

2. Flood risk mitigation measures require finalisation

The proposed flood risk mitigation measures provided in the EIS require further detail and justification. Of particular importance is the adoption of an appropriate finished level for the infrastructure. Mitigation measure FH01 states “Increase levels to maintain adequate freeboard of BESS infrastructure to ensure the site is constructed above the 1% AEP event to reduce risk from flooding”. The proponent should define and justify the “adequate” freeboard, and subsequently, the finished level for the infrastructure. Given the nature of the proposed development, RD recommends that critical infrastructure is elevated at or above the probable maximum flood level where practicable.

In addition, mitigation measure FH02 states “Develop Flood Emergency Response Plan (FERP)”. RD acknowledges that the proponent discussed emergency management matters with Berrigan Shire Council and NSW SES on 24 June 2025. The NSW SES has provided further written advice and recommendations in a letter dated 17 July 2025. Recommendations included updates to the “FIRA” (sic) and considerations for a future Flood Emergency Response Plan. The recommendations from the NSW SES have not been fully addressed.

Recommendations:

- 2.1. Finalise flood risk mitigation measures with a sufficient level of detail and justification for implementation.
- 2.2. Finalise the FIA, and future Flood Emergency Response Plan, in accordance with the recommendations provided by the NSW SES.

Biodiversity

The Biodiversity Development Assessment Report (BDAR) at Appendix 1 does not meet the SEARs for biodiversity.

RD has reviewed the BDAR at Appendix F.1 of the EIS, prepared by NGH Pty Ltd (September 2025) and BOAMS case number 00050419. Specific advice on the BDAR and related sections in the EIS are identified below.

3. Exclusion of some predicted credit species requires further justification

The following ecosystem credit species have been excluded in the BDAR:

- Brown Treecreeper
- Grey-crowned Babbler
- South-eastern Hooded Robin
- Swift Parrot.

The justification provided for the exclusion of these species relates to habitat degradation, which does not comply with Section 5.2.2(2) of the BAM. Ecosystem credit species can only be excluded based on listed geographic limitations, habitat constraints or vagrancy.

We note that this is a minor issue and is unlikely to impact the credit obligation, however the BDAR should be amended to ensure consistency with the BAM.

Recommendations:

- 3.1. Revise all predicted credit species removed from further assessment in accordance with Section 5.2.2(2) of the BAM. Update relevant sections of the BDAR, including Table 10, and BAM-C to include any species identified as requiring assessment.

4. Mitigation measures need more detail to meet the requirements of the BAM

Biodiversity offsets need to be removed from Table 8.5, as they are not a mitigation measure and replaced where relevant with appropriate actions to ensure best practice mitigation measures are implemented for the project.

Mitigation measures should follow SMART principles (specific, measurable, achievable, relevant, and time-bound). Measures need to be given unique identifiers for auditing purposes and to ensure each measure is tracked through the consent and post-approval processes. This also applies to measures in the EIS.

Recommendations:

- 4.1. Revise the mitigation measures outlined in Table 8.5 of the BDAR and in the BMP to include:
 - clear and concise language should be used to ensure no clearing occurs outside of the development footprint
 - define the threshold for 'poor adherence to protocols'
 - hygiene protocols should be included as per the Department's Hygiene guidelines including amphibian chytrid fungus and invasive plants.
 - removal and suppression of weeds should be completed by a suitably qualified person in the identification and management of locally occurring weed species
 - scheduling the clearing works for a time of year to avoid the breeding seasons of identified potential threatened species and other fauna that may breed on site
 - pre-clearance surveys should be completed in the 48 hours prior to clearing
 - pre-clearance surveys should include suitable exclusion mitigation methods for species likely to use the site, (i.e. amphibians, reptiles and microbats). This

mitigation should include erecting frog-fences to exclude amphibians such as Sloane's Froglet from the construction site. This specific mitigation is required as this species was not reliably excluded from using nearby habitats using the FrogID App

- communication should occur with rescue agencies and local veterinarians prior to the commencement of clearing to confirm the availability of resources for any captured/injured fauna that are unable to be released
- if threatened fauna are detected during pre-clearance surveys, an incidental finds protocol including comparative habitat assessments should be prepared for clearing sites and proposed release sites provided to ensure that habitat features are available in the released sites.

5. Indirect and prescribed impacts from the proposed 132 kV transmission line must be considered

Section 1.1.3 of the BDAR states that the proposal will connect to the Finley substation southwest of the site, via an underground or overhead 132 kV transmission line. However, potential impacts from the transmission line are not mentioned in the BDAR.

If the transmission line is to be overhead, the BDAR must assess the impact of transmission strike on threatened entities and their habitat, taking into account flight paths for resident, nomadic and migratory species likely to fly over the proposed development site. Impacts should be based on published literature and other reliable sources.

If the transmission line is to be underground, impacts to water bodies or any hydrological processes that sustain threatened entities which occur on the subject land must be considered in accordance with Section 6.1.4 and 8.3.4 of the BAM.

Relevant sections of the BDAR should be amended accordingly, including appropriate mitigation measures.

Recommendations:

- 5.1. Amend the BDAR to include an assessment of indirect and prescribed impacts for the proposed 132 kV transmission line and appropriate mitigation measures.