

Our ref: OUT25/15208

Pragya Mathema
Planning Group
NSW Department of Planning, Housing and Infrastructure
Email: Pragya.mathema@dpie.nsw.gov.au

16/12/2025

Subject: Griffith Battery Energy Storage System - SSD-85372970 – Environmental Impact Statement (EIS)

Dear Pragya Mathema,

I refer to your request for advice sent on 19 November 2025 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

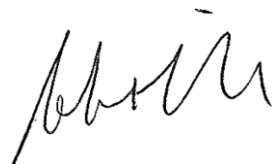
NSW DCCEEW Water Group has reviewed the EIS and has recommendations regarding:

- demonstrating an adequate and secure water supply to meet project demands during construction and operation, and;
- acquiring a water access licence (WAL) to account for the maximum predicted water take.

Please see **Attachment A** for details.

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

Yours sincerely

A handwritten signature in black ink, appearing to read "Rob Brownbill".

Rob Brownbill,
Manager, Water Assessments, Knowledge Division
NSW Department of Climate Change, Energy, the Environment and Water

Attachment A

Detailed advice to DPHI Planning & Assessment regarding the Griffith Battery Energy Storage System - SSD-85372970 – Environmental Impact Statement (EIS)

1.0 Water supply, take and licensing

1.1 Recommendation – pre-determination

The Department of Planning, Housing and Infrastructure (DPHI) should request the proponent to demonstrate an adequate and secure water supply to meet project demands during construction and operation.

Explanation

Insufficient information has been provided to confirm how the project will meet the 20 ML/year site water demands. The proponent has not confirmed how the water demand will be managed through external sources or suppliers beyond being a licenced private supplier or Griffith City Council. The proponent must demonstrate they are able to obtain sufficient entitlement to account for the maximum take and/or confirm consultation with third party water suppliers has occurred to meet demands.

1.2 Recommendation – post approval

DPHI should request the proponent to obtain a water access licence (WAL) to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the *Water Management (General) Regulation 2025*.

Explanation

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 the *Water Management (General) Regulation 2025* applies. An exemption may be available for water take during construction activities in coastal water sources under Clause 6 of Schedule 4 of the WM Reg, or where the groundwater take during construction or operation is less than or equal to 3ML per water year (cl 19, sch 4 of WM Reg). To claim either of these exemptions certain requirements must be met, such as

- 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 and exemptions, including a form to report and record water taken can be found at: <https://water.dpie.nsw.gov.au/licensing-and-trade-and-groundwater-access-licence-exemptions> | NSW Government Water.