



Your ref: SSD-85372970

Our ref: DOC25/988482

Pragya Mathema  
Senior Environmental Assessment Officer  
Department of Planning, Housing and Infrastructure- NSW Planning Group  
Via Major Projects Portal: PAE-99871963

Dear Pragya

**Subject: Griffith Battery Energy Storage System (SSD 85372970)**

Thank you for your email dated 19 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 26 June 2025.

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

Our decision to waive the BDAR dated 22 October 2025 negates the need for the biodiversity assessment listed in the SEARs. No further assessment of biodiversity impact is required.

A summary of our assessment, advice and, where appropriate, recommended conditions of approval is provided in **Attachment A**. Detailed advice is provided at **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 Marcus Wright, Senior Conservation Planning Officer, via [planning.southwest@dcceew.nsw.gov.au](mailto:planning.southwest@dcceew.nsw.gov.au) or 6938 4917.

Yours sincerely

Helen Wardby  
5 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 Griffith BESS EIS (SSD 85372970)

ATTACHMENT B – Detailed advice for Griffith BESS EIS (SSD 85372970)

## **ATTACHMENT A    RD Assessment Summary for Griffith BESS EIS (SSD 85372970)**

### Key Issues

The following issues and recommendation are to be resolved in the detailed design phase.

### Flood Risk Management

1. 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.
  - 1.1. Incorporate the detailed design of the project into the hydraulic model to accurately investigate the impact of flooding on the proposed development.
  - 1.2. Ensure that critical and sensitive infrastructure are elevated sufficiently to minimise flood risks.
- 2.1. Complete additional hydraulic modelling in the detailed design phase to investigate the cumulative impacts of adjacent development on flood risks.

## **ATTACHMENT B Detailed advice for Griffith BESS EIS (SSD 85372970)**

### Flood Risk Management

RD has reviewed the hydrology component in Section 6.8 of the EIS (Appendix M).

**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. Update the hydraulic model with the detailed design to accurately investigate flood behaviour.**

The assessment of flood risk presented in the Hydrology Assessment is largely conceptual and does not consider the impact of flooding on the proposed development. The focus of the assessment was on limiting the flows external to the site to pre-development conditions, while not considering the impacts of flooding on the project infrastructure within the site.

The full range of flood risks up to and including the probable maximum flood (PMF) need to be assessed as required by the SEARs. This is largely to ensure that sensitive site infrastructure is located and elevated to a level that minimises flood risk.

There is no mention of the proposed elevation of critical and sensitive infrastructure above design flood levels in the EIS. This must be further investigated in the detailed design phase of the project.

RD recommends that once finalised, the detailed design be incorporated into the hydraulic model to accurately investigate these issues. The outcomes of the additional modelling should be documented in an updated Hydrology Assessment and confirm that flood risks have 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.
- 1.2. Ensure that critical and sensitive infrastructure are elevated sufficiently to minimise flood risks.

#### **2. Update the hydrologic assessment to include an assessment of the cumulative impacts of development.**

The hydrological assessment presented considers the flood impacts of the BESS in isolation, without considering the cumulative impacts of the existing Griffith Solar Farm (SSD-6604) and the proposed Yoogali Solar Farm, both adjacent to this BESS.

RD recommends that during the detailed design phase, a cumulative flood impact assessment be completed to ensure flood risks internal and external to the project site are within acceptable limits.

#### *Recommendations:*

- 2.1. Complete additional hydraulic modelling in the detailed design phase to investigate the cumulative impacts of adjacent development on flood risks.