

Submissions Report

Homebush Battery Energy Storage System

14 Oct 2025
Homebush BESS

Submissions Report

Homebush Battery Energy Storage System

Client: Ausgrid

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Executive summary

Ausgrid is seeking development consent to construct, operate and maintain the Homebush Battery Energy Storage System (BESS) adjacent to the existing Ausgrid 132 kilovolt (kV) Mason Park sub-transmission switching station (STSS) located in Homebush, New South Wales (NSW). The proposed development would involve the installation of the BESS and its connection, via a 33 kV underground cable, to the existing substation infrastructure. The BESS would be located in the central portion of the site. This Submissions Report refers to the above proposed development as 'the Project'.

The key strategic driver for the Project is to support the transition of the National Electricity Market (NEM) away from fossil fuels and towards primarily renewable energy, whilst also providing storage capacity to increase the stability of the electricity network.

The Project is considered State Significant Development (SSD) under the *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act). As such, an Environmental Impact Statement (EIS) for the Project was prepared in accordance with the relevant provisions of the EP&A Act and in accordance with the Secretary's Environmental Assessment Requirements (SEARs) issued by the Secretary of the Department of Planning, Housing and Infrastructure (DPHI) on 20 November 2024. The EIS also addressed the relevant provisions of the *Environmental Planning and Assessment Regulation 2021* (NSW) (EP&A Regulation), and the *NSW Government's "State significant development guidelines – Appendix B – preparing an environmental impact statement"* (DPIE 2022).

The EIS was placed on public exhibition for 32 days from Thursday 19 June 2025 until Tuesday 21 July 2025, in accordance with the requirements of the EP&A Act. During the exhibition period, community members and stakeholders were able to submit feedback on the Project.

This Submissions Report addresses the requirement to consider and respond to all submissions received and has been prepared in accordance with the NSW Government's *"State significant development guidelines – preparing a Submissions Report: Appendix C to the state significant development guidelines"* (DPHI, 2024) (the 'SSD Guideline').

During the exhibition period, 13 submissions were made by various agencies and Strathfield Council, and 61 submissions were made by the public.

This Submissions Report addresses the requirement to consider and respond to all submissions received and has been prepared in accordance with the NSW Government's *"State significant development guidelines – preparing a Submissions Report: Appendix C to the state significant development guidelines"* (DPE 2021) (the SSD Guideline).

Where required, further assessment has been undertaken to respond to the comments raised by agencies, Strathfield Council and the public.

This Submissions Report demonstrates that the Project is appropriately located and can be undertaken in a manner that would not result in significant impacts on the local community or the environment. The environmental, social and economic benefits of the Project are considered to outweigh any temporary impacts, and as such the Project is considered justified and worthy of development consent.

1.0 Introduction

1.1 Background

Ausgrid (the applicant) is seeking development consent to construct, operate and maintain the Homebush BESS (the Project) adjacent to the existing Ausgrid 132 kilovolt (kV) Mason Park sub-transmission switching station (STSS) located in Homebush, NSW. The BESS would have a capacity of 200 megawatts (MW) over a two-hour duration (i.e. 400 megawatt hours (MWh)). The location of the Project and its regional context is shown in **Figure 1**.

At the time of EIS exhibition, the Project was referenced as located on Lot 1 of Deposited Plan (DP) 1218128 at 10 Homebush Bay Drive, Homebush, NSW 2140. This lot has now been divided into two lots, as shown in **Figure 2**:

- Lot 1 DP1218128, containing the existing substation
- Lot 2 DP1218128, containing surplus land.

The Project Area, as defined in the EIS, is unchanged and is shown in **Figure 3**.

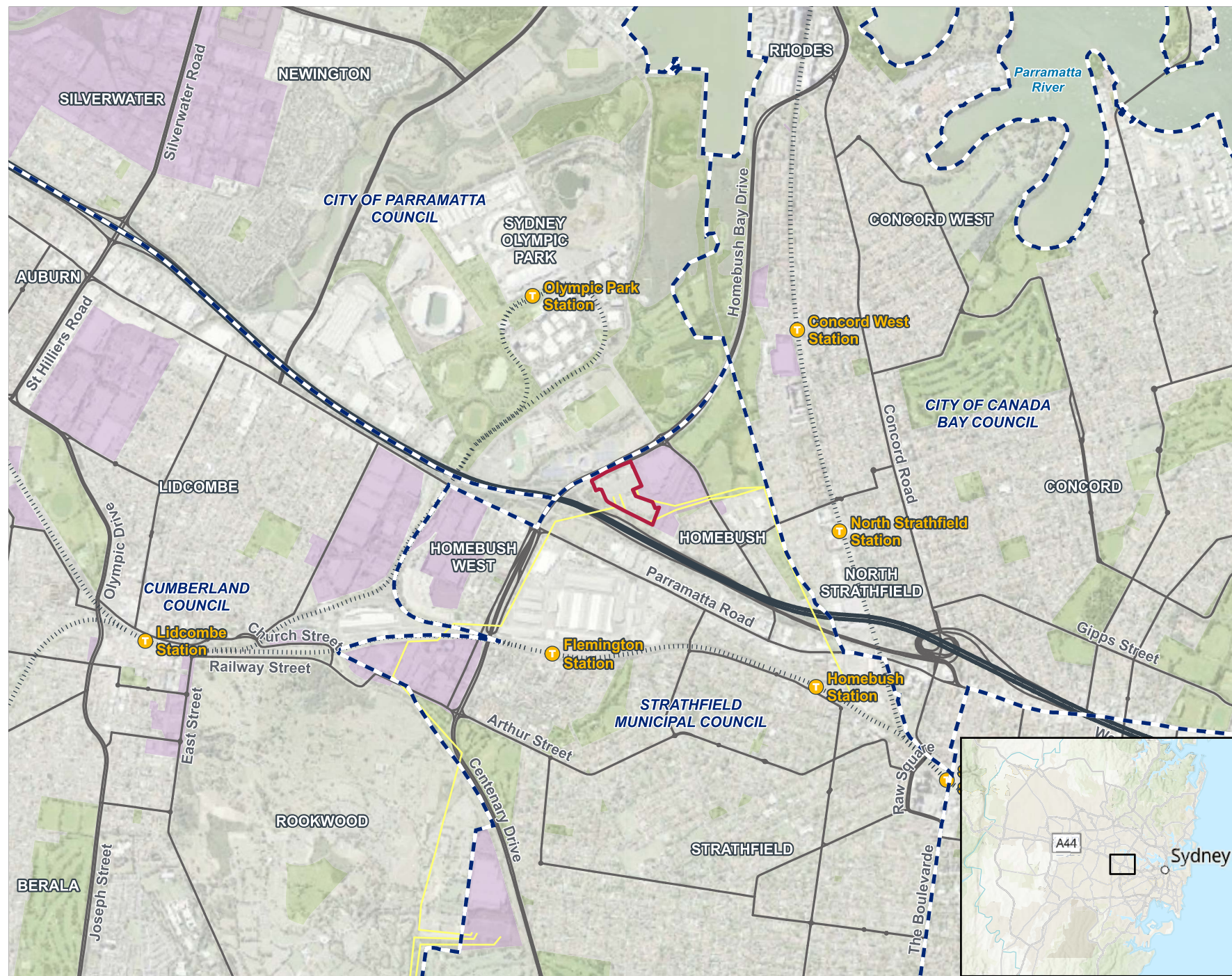
BESS projects are defined as ‘*electricity generating works*’ under *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP). Section 2.36 of this policy provides that electricity generating works may be carried out by any person with consent on any land in a prescribed non-residential zone. The Project is located in land zoned as ‘SP2 Infrastructure (Electricity Supply)’, which is one of the prescribed non-residential land use zones defined in section 2.35. On this basis, the Project is permissible with development consent.

Further to this, the Project would be considered State Significant Development (SSD) as it will have an estimated development cost (EDC) of more than \$30 million (as defined within *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP)).

The Environmental Impact Statement (EIS) for the Project was placed on public exhibition for 32 days from 19 June 2025 until 21 July 2025 in accordance with the requirements of the EP&A Act. During exhibition, the public and stakeholders submitted feedback on the Project which has been considered in the following sections.

This Submissions Report addresses the requirement to consider and respond to all submissions received and has been prepared in accordance with the NSW Government’s “*State significant development guidelines – preparing a Submissions Report: Appendix C to the state significant development guidelines*” (DPHI, 2024) (the ‘SSD Guideline’).

FIGURE 1:
REGIONAL SETTING



Legend

- The site
- LGA boundary
- Industrial area
- Local park
- Motorway
- Primary road
- Railway
- Railway station

Transmission Lines

132 kV

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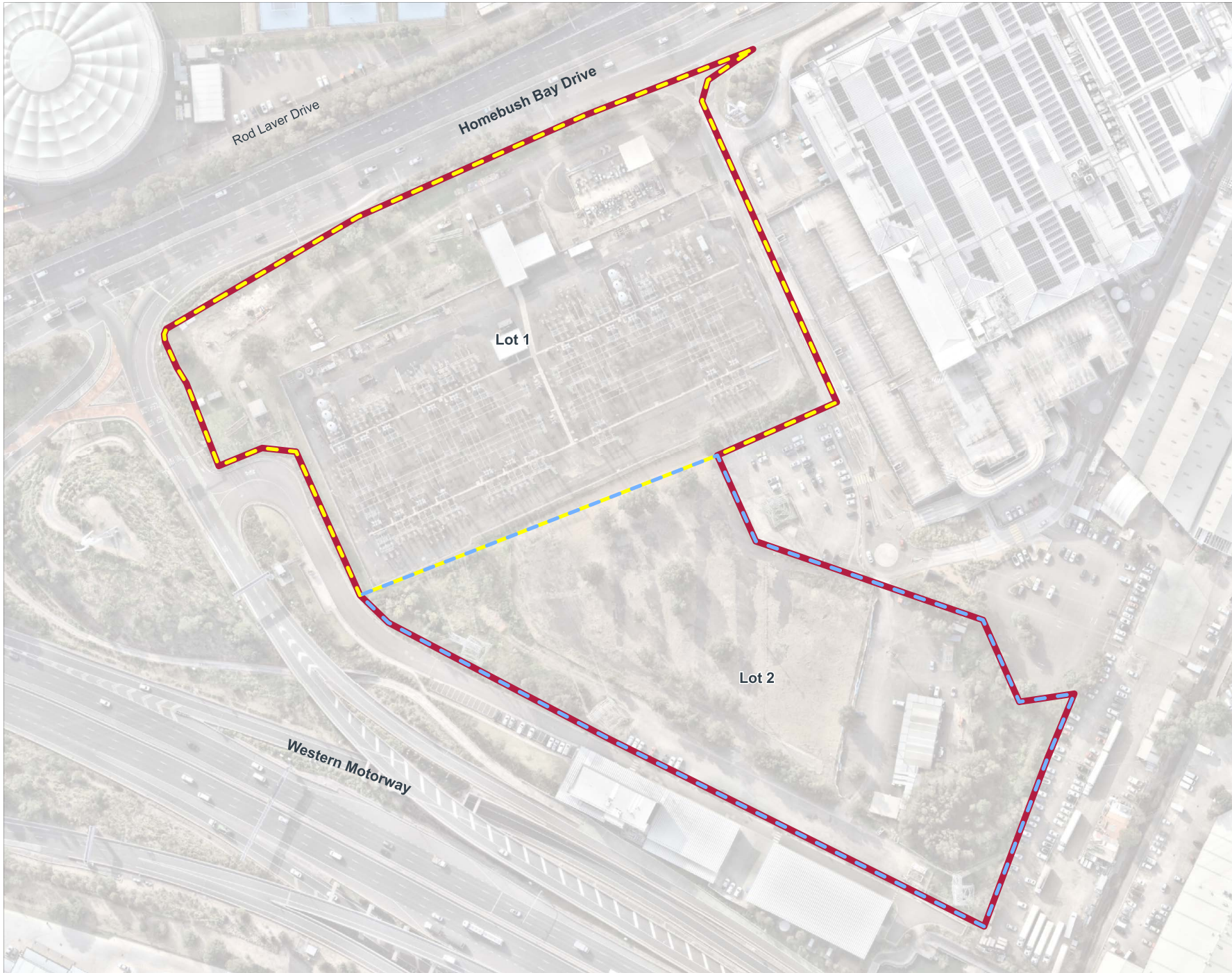


FIGURE 2:
SUBDIVISION OF LOTS

- Legend**
- The site
 - Lot 1
 - Lot 2

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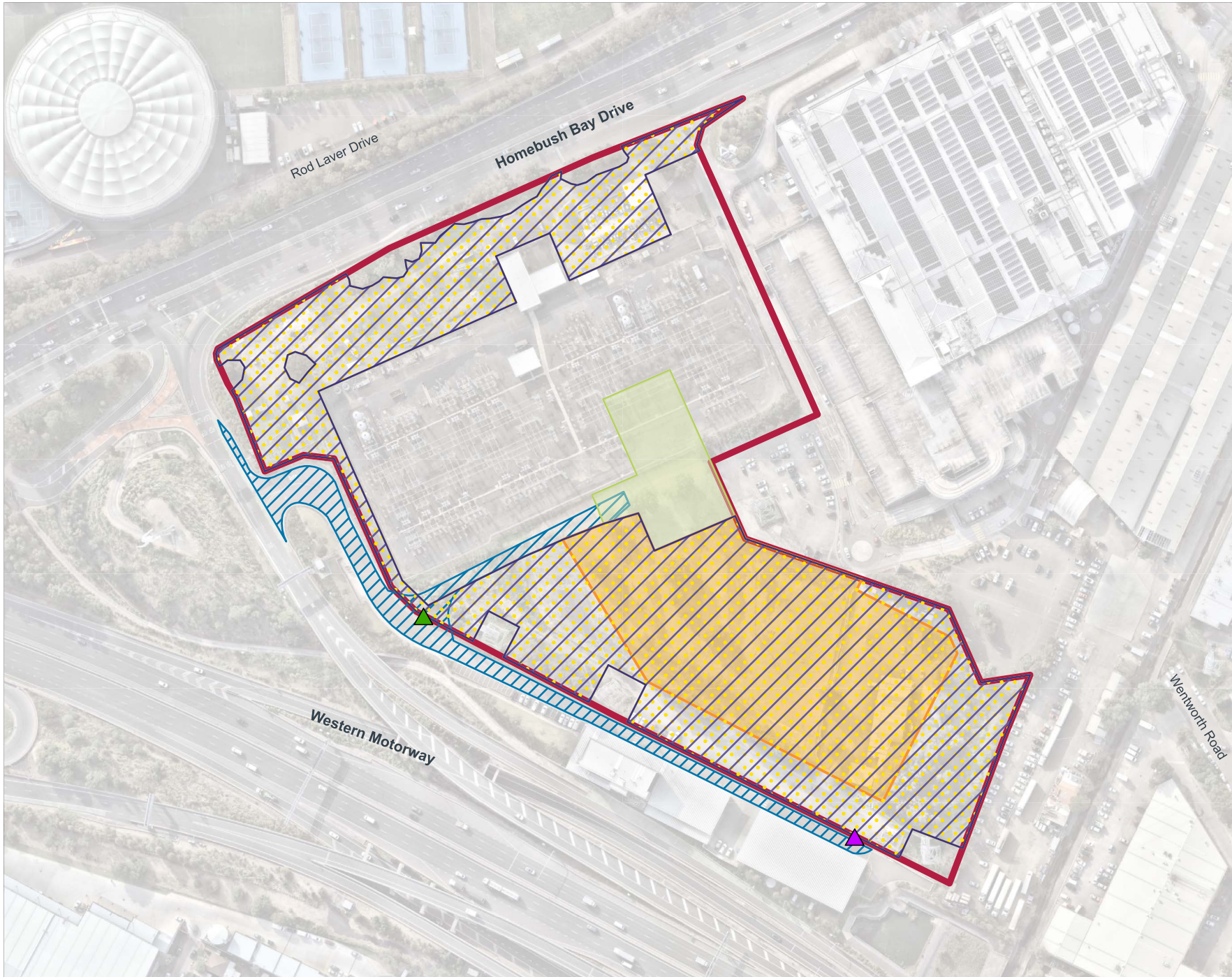


FIGURE 3:
PROJECT LOCATION

- Legend**
- The site
 - Project Area
 - Construction Footprint
 - Operational Footprint
 - HV connection infrastructure (area subject to separate approvals process)
 - Access Road
 - Permanent site entry/exit
 - Site entry/exit during construction

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1.2 Project objectives

Over the past two decades the contribution of renewable energy to the national electricity market (NEM) has increased from zero to around 38%. As this continues to grow the need for short term storage becomes increasingly important, allowing the intermittency of renewable energy to be evened out across daily cycles. Ausgrid aims to address this through the development of the Project.

The objectives of the Project are:

- To provide storage capacity to the NEM to increase the stability of the electricity network
- To support the transition from fossil fuel to renewable energy by providing firming capability to support increasing levels of renewable energy generation, and
- Where applicable, provide system services to help correct and/or stabilise the wider transmission network, e.g. frequency stabilisation.

1.3 Proponent details

Ausgrid is the largest distributor of electricity in eastern Australia, providing power to 1.8 million customers and powering 60% of NSW's gross domestic product. Ausgrid's network is made up of substations, transmission lines, underground cables and power poles, spanning 22,275 square kilometres (km²) throughout Sydney, the Central Coast and the Hunter Region.

The NSW Treasury holds the largest stake in the Ausgrid business (49%), with the remainder made up of institutional investors.

Ausgrid operates in the NEM as both a Distribution Network Service Provider (DNSP) and a Transmission Network Service Provider (TNSP). Ausgrid actively operates, maintains, repairs and builds its electricity network with a focus on safety and reliability. **Table 1** provides further information on Ausgrid.

Table 1 Proponent details

Item	Details
Applicant Name	Ausgrid
Address	24-28 Campbell Street, Sydney, NSW, 2000
ABN	78 508 211 731

1.4 Updated Project description

The Project comprises a BESS with capacity of 200 MW over a 2-hour duration, (i.e. 400 MWh at the point of connection) adjacent to the existing Ausgrid 132 kilovolt (kV) Mason Park sub-transmission switching station (STSS). The BESS would store energy from the grid, releasing it during high demand periods, as well as performing other ancillary grid services.

The key components of the Project that would be located at the site are shown indicatively on **Figure 4**.

A summary of the key features of the Project and the existing infrastructure within proximity of the site as well as the augmentation of this infrastructure that would be required to facilitate the Project, is provided in **Table 2** and **Table 3** respectively.

These features comprise the proposed development for which development consent is sought under this State Significant Development application (SSDA).

Following the submission of the EIS, design refinements have been made, and the Project description has been updated to reflect these changes. The design refinements are summarised as follows and shown in **Figure 3**.

Modified layout of the containerised battery units, including rotation of the layout by 90 degrees within the existing Project Area

- Reconfiguration of the internal site access roads to optimise internal heavy vehicle movements

- External site access remains unchanged, via an existing driveway to the WestConnex Fulton Hogan Egis Motorway Control Centre office and warehouse (the MCC), from the M4 Western Motorway on-ramp (eastbound), via Homebush Bay Drive (the Access Road). The southern vehicle site access point on the Access Road has been relocated further to the southeast by around 90 metres. This access point is to be used for ingress and egress movements by light vehicles only during construction (previously egress only by both light and heavy vehicles). This change will improve internal traffic flow and reduce impacts on Transurban's operations. After construction, this access point will be locked and only be used as an emergency entry/exit point. All operational vehicles will use the main site entry point to the north
- To accommodate the updated battery unit layout some of the ancillary facilities have been relocated to the west of the containerised battery units within the existing Project Area. These include the combined switch room and control building, an operation and maintenance (O&M) building and a warehouse (formerly a combined onsite workshop facility) and the parking bays. The number of parking spaces has increased from two spaces to up to seven spaces.
- Due to the reconfiguration of the battery units and to consider emergency access, the noise barriers have been revised. To ensure the site maintains noise compliance, the noise barrier follows a revised layout around the perimeter of the containerised battery units rather than running through the middle of the site. The height of the noise walls has been increased by 2.5 m to 8.5 m.
- A gated maintenance access track through the site has been included to connect the WestConnex Fulton Hogan Egis Motorway Control Centre office and warehouse (the MCC) with DFO Homebush and public transport to the north of the site. This would be located along the south-east boundary of the BESS and used only by pedestrians.

The above elements have been included in the Project overview in **Table 2**. Where additions have been made to the original Project description, these are shown in **bold**.

Table 2 Project overview

Feature	The Project
The Project	• Construction, operation, and maintenance of a BESS with a 200 MW maximum power output capacity with 2-hour duration (i.e. 400 MWh) • Containerised battery units (112 Megapacks) and associated infrastructure, including inverters and 56 MV transformers • A 33 kV underground cable connection from the containerised battery units to the Mason Park STSS • A combined switch room and control room building • Eight RMU • An O&M building • A warehouse An onsite workshop facility • One auxiliary transformer • A backup diesel generator • Two Up to seven spaces for onsite car parking • Other ancillary infrastructure including fire suppression, stormwater management, 2.4 m high boundary security chain wire fencing, noise barriers, lighting and CCTV.
The site	The site is located in Lot 1 and Lot 2 of DP 1218218 being 10 Homebush Bay Drive, Homebush, NSW 2140. The Project would be located in the central portion of the property.
Disturbance area	The total area of disturbance within the site would be approximately 3.39 ha.
Access	Access to the Project is proposed via an existing driveway to the WestConnex Fulton Hogan Egis Motorway Control Centre office and warehouse (the MCC), from the M4 Western Motorway on-ramp (eastbound), via Homebush Bay Drive (the Access Road). The Access Road would require traffic management measures to control site entry and exit for construction vehicles.

Feature	The Project
Maintenance access track	A gated maintenance access track through the site has been included to connect the MCC with DFO Homebush and public transport to the north of the site. This would be located along the south-east boundary of the BESS and used only by pedestrians.
Noise barrier	The configuration of the noise barriers has been altered. The noise barrier follows a revised layout around the perimeter of the containerised battery units rather than running through the middle of the site. The noise barrier has also increased in height by 2.5 m to 8.5m. The noise barrier will be positioned around the northern, southern, and eastern sides of the battery units, as shown in Figure 4. Urban design features are proposed on the noise barrier along the northern boundary to provide improved visual amenity. An emergency access gate would be provided in the southern section of the noise barrier to allow emergency site entry from the Access Road during operation.
Grid connection	The Project would be connected to the NEM through the Mason Park STSS via a 33 kV underground cable.
Estimated Development Cost	The total EDC for the Project would be \$215 million.
Construction	
Construction activities	Construction would involve: • Enabling works • Civil, structural, mechanical and electrical works • Testing and commissioning • Demobilisation. Construction laydown areas would be provided within the Project's Construction Footprint.
Plant and equipment	The indicative plant and equipment would include: Enabling works: • Front end loaders • Dump trucks • Road trucks • Water trucks • Excavators • Graders • Compactors • Light vehicles. Civil, structural, mechanical and electrical works: • Front end loaders • Road trucks • Graders • Concrete trucks and pumps • Dump trucks • Excavators • Bobcats • Compactors and rollers • Elevated work platforms • Cranes • Concrete saws and grinders • Water trucks • Light vehicles • Backhoe • Generators.

Feature	The Project
	Testing and commissioning: - Elevated work platforms - Cranes - Generators - Light vehicles. Demobilisation: - Water trucks - Compactors - Backhoe - Light vehicles.
Construction duration	It is anticipated that construction of the Project would commence in late 2025 mid-2026 and be completed by Q2 2028 2027 (approximately 22 months). However, these dates are subject to change pending equipment lead times and availability.
Construction workforce	Up to 100 construction workers (at peak) would be required. These workers would be preferentially sourced locally where appropriate skillsets are available.
Construction hours	Proposed construction would occur during standard working hours as outlined in the <i>Interim Construction Noise Guideline</i> (NSW Department of Environment and Climate Change, 2009) (ICNG), being: - Monday to Friday 7.00 am to 6.00 pm - Saturday 8.00 am to 1.00 pm - No works on Sundays and Public Holidays. Activities that may be required to be completed outside of those standard hours would be completed in accordance with an Out of Hours Work procedure and may include (but not be limited to): - Electrical commissioning and testing - Emergency situations where work is required to prevent harm to persons or property.
Construction traffic volumes	Up to 134 light vehicles and 20 heavy vehicles per day at peak.
Operation	
Operational life expectancy	The BESS is intended to operate for 50 years with component replacements. At the end of this period the BESS would be decommissioned and the site rehabilitated. Any extension to the life of the BESS would be subject to a separate approval at the time.
Operational workforce	The BESS would operate 24 hours a day, seven days a week as an unmanned facility. Staff activity at the site would be limited to planned and unplanned maintenance only.

Table 3 Site infrastructure

Infrastructure	Detail
Stormwater	New stormwater drainage infrastructure would be constructed to service the Project.
Potable water	An existing potable water supply within the site connects to the STSS. A new potable water metered connection would be installed for the Project. During construction, potable water would be supplied by imported truck supply.
Sewer	There is an existing sewer connection to the Mason Park STSS. However, a new connection would be sought for the Project.
Electricity	Ausgrid would install a new metered electricity connection at the site.

Infrastructure	Detail
Telecommunications	The site would utilise the existing Ausgrid fibre from the adjacent Mason Park STSS and a secondary connection via the National Broadband Network (NBN) or cellular 4G.
Fire services	Fire water would be provided onsite via fire hydrants. Any additional fire water requirements from the Fire Safety Study (to be prepared during detailed design) will be incorporated prior to construction.
Security	The STSS is currently fenced, and access controlled. There is also signage around the perimeter. A 2.4 m high chain wire security fence would be constructed around the perimeter of the Project. This would be augmented with security gates to facilitate authorised access only. CCTV would also be installed.
Access and circulation	The Access Road would require traffic management measures to control access by construction vehicles to the Project Area. The internal site roads, which would enable vehicular access during operation of the Project, are shown in Figure 4 .
Parking and workforce	Up to 20 heavy vehicles per day would require access to the Project Area during construction. These vehicles may arrive and leave at any point during the day, but most likely would arrive in the early morning. Parking would be provided within the site for heavy vehicles. Following arrival, heavy vehicles would remain on site until no longer required, then they would depart. Sufficient parking would be provided onsite for staff during construction to ensure vehicles do not park on the surrounding road network. Adequate parking would be provided onsite for the operation of the Project with up to seven spaces to be provided to accommodate the operational staffing requirements.

FIGURE 4:
UPDATED PROJECT
LAYOUT

Legend

-  The site
-  Project Area
-  Operational Footprint
-  Proposed underground 33kV grid connection
-  HV connection infrastructure (area subject to separate approvals process)
-  Access Road
-  Laydown area
-  Ancillary facilities
-  Containerised battery units
-  Internal site road
-  Maintenance access track
-  Permanent site entry/exit
-  Site entry/exit during construction
-  Noise barrier

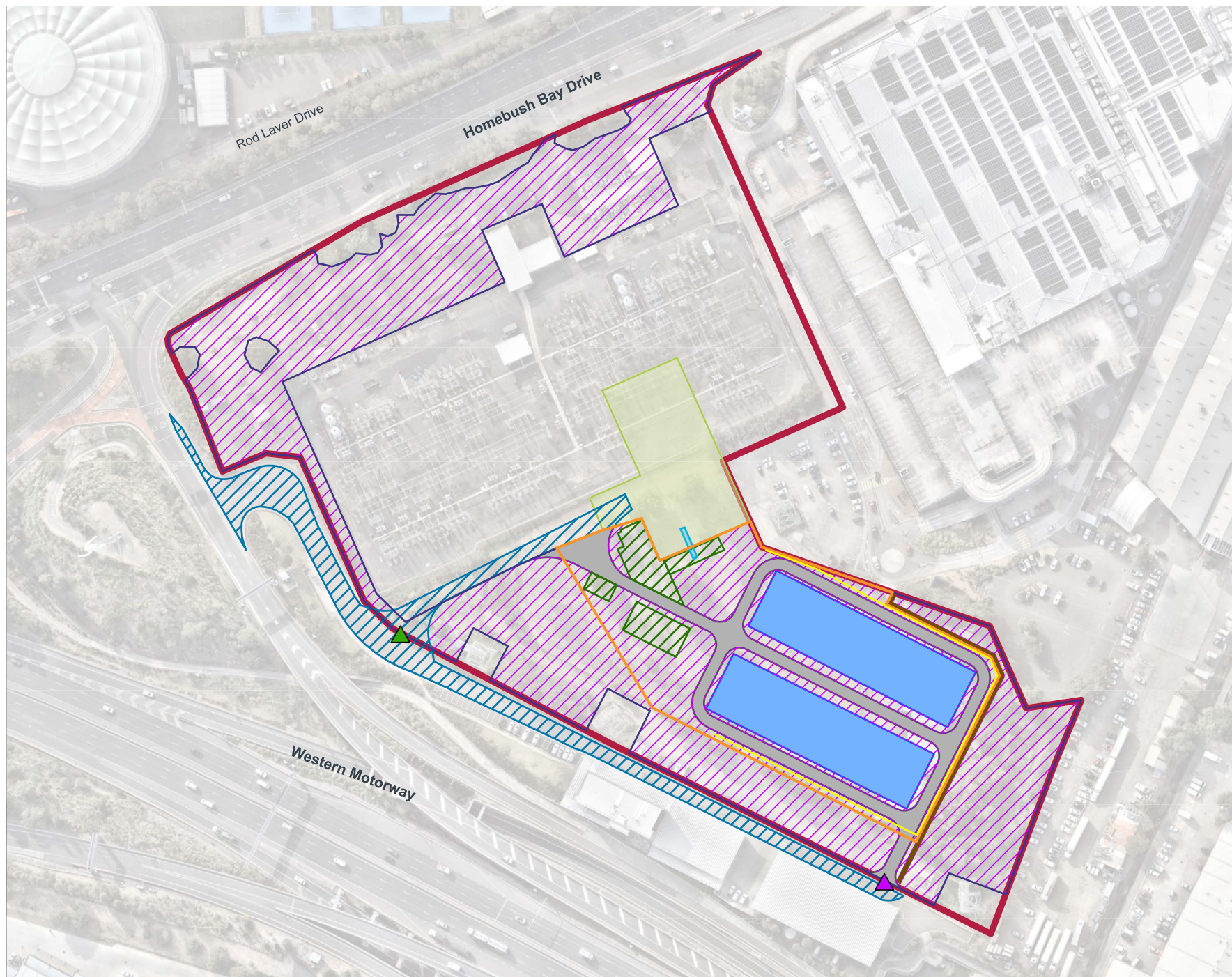
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1.5 Purpose of this Submissions Report

This Submissions Report has been prepared in accordance with the NSW Government's SSD Guideline and the EP&A Regulation. The SSD Guideline provides a detailed outline of the form and content requirements for Submissions Reports.

A summary of compliance against the criteria within Appendix C of the SSD Guideline is provided in **Table 4**.

Table 4 Submissions Report requirements (DPHI, 2024)

Requirement	Reference
Executive summary	Included at the preface of this Submissions Report
Introduction	Section 1.0
Analysis of submissions	Section 2.0
Actions taken since exhibition	Section 3.0
Response to submissions	Section 4.0
Updated Project justification	Section 5.0
References	Section 6.0
Submissions Register	Table 9 and Appendix A
Updated mitigation measures	Appendix B

In line with the SSD Guideline, **Section 5.0** provides an updated Project justification and evaluation that considers the outcomes of the EIS, and the additional information provided in this Submissions Report.

2.0 Analysis of submissions

2.1 Overview of submissions received

This section summarises the agency and public submissions that were received in response to the public display of the Project's EIS.

Submissions were received and accepted by DPHI during the public exhibition of the EIS from 19 June 2025 until 21 July 2025 (32 days) via electronic submission (online) at www.planningportal.nsw.gov.au/major-projects.

Copies of the full submissions can be viewed and downloaded from the NSW Major Projects website [Homebush Battery Energy Storage System | Planning Portal - Department of Planning, Housing, and Infrastructure](#).

A total of 74 submissions were received during the public exhibition of the EIS, consisting of 12 agency submissions, one key stakeholder submission (Strathfield Council), and 61 public submissions, including community organisations. An overview of the submissions made during the EIS exhibition period is provided in **Table 5**.

Table 5 Overview of submissions received

Position	Number of submissions from government agencies and Council	Number of submissions from public members and organisations	Total
Support		1	1
Comment	13	1	14
Objection		59	59
Total			74

The agencies and organisations that provided responses included:

- Ausgrid
- DPHI – Crown Lands
- DPHI – Hazards
- Fire and Rescue NSW
- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Conservation Programs, Heritage and Regulation (CPHR) Group
- NSW DCCEEW – Heritage NSW
- NSW DCCEEW – Water Group
- NSW Department of Primary Industries and Regional Development (DPIRD) – NSW Resources
- NSW Rural Fire Service
- Strathfield Council
- Sydney Olympic Park Authority
- Sydney Water
- Transport for NSW.

2.2 Approach

2.2.1 Agencies and Strathfield Council

Each agency submission was reviewed in detail to identify and understand the issues raised. The content of each agency submission is summarised in this report and, where possible, the verbatim text of the submission has been included. This means that while the exact wording of a particular submission may not be presented in the summary of the issue, the intent of each individual issue raised has been captured and a corresponding response to each issue has been provided.

The issues raised in the agency and Strathfield Council submissions have been individually addressed in **Section 4.1** and **Section 4.2**.

2.2.2 Public

Each public submission was reviewed in detail to identify and understand the issues raised. The issues raised in the submissions were then categorised based on recurring themes. This means that while the exact wording of a particular submission may not be presented in the summary of the issue, the intent of each individual issue raised has been captured and a corresponding response to each theme has been provided.

Issues raised in the public submissions have been collectively addressed in **Section 4.3**.

Key themes raised:

- The Project
 - Design elements
 - Project lifecycle
 - BESS technology
- Justification and evaluation of the Project
 - Site selection and Project alternatives
 - Project justification
 - Modern slavery and supply chain ethics.
- Community and stakeholder consultation:
 - Level of public consultation
 - Engagement with Indigenous groups
- Environmental impacts:
 - General environmental impacts, management and monitoring
 - Potential hazards
 - Chemical waste
 - Traffic and transport
 - Biodiversity (including ecologically sustainable development)
 - Agriculture
- Social and economic impacts:
 - Amenity impacts
 - Impact on property values
 - Insurance and compensation
 - Job availability
 - Costs

Spatial distribution analysis

Three submissions were received from Homebush (Project location) and Homebush West. Of these, one was in support and one was a comment. No objections were received from Homebush.

A further six submissions were received within 40 km of the Project location, all in objection.

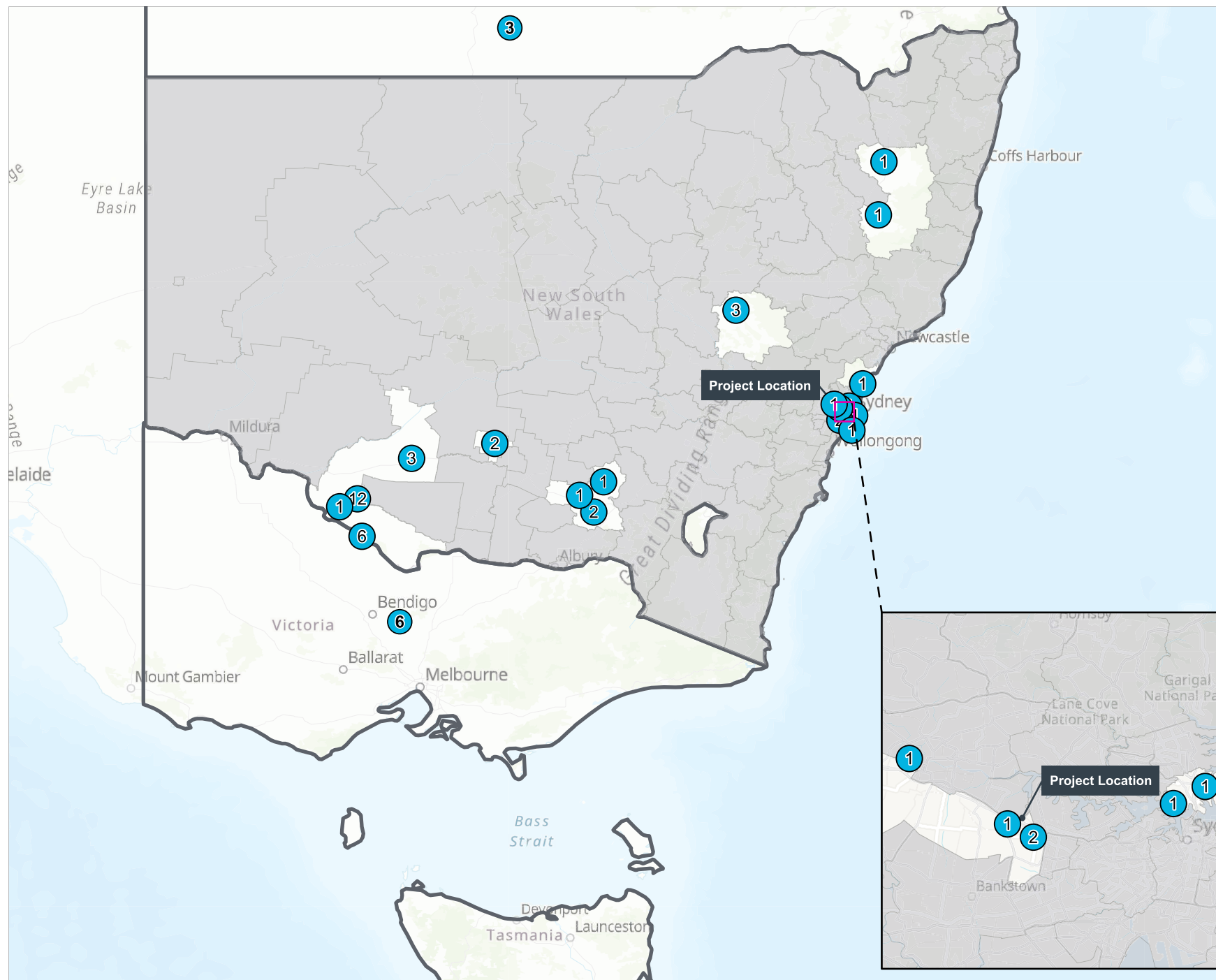
A total of 54 submissions were received from suburbs outside of a 40 km radius of the Project, all in objection. The suburb where the greatest number of submissions were received from was Moulamein, with 12 submissions (located 795 km from the Project, near the Victorian border).

In total, three submissions were received from Queensland and six from Victoria. The suburbs located the greatest distance from the Project were Kepnock, Queensland (located 1,270 km from the Project) and Horsham, Victoria (located 1,040 km from the Project). The spatial distribution of the public submissions is summarised in **Figure 5**.

FIGURE 5:
LOCATIONS OF PUBLIC
SUBMISSIONS

Legend

- Total number of submissions
- Local Government Areas



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3.0 Actions taken since exhibition

This section of the Submissions Report summarises the actions taken by the applicant since the lodgement of the EIS and during the exhibition period. This includes additional engagement (**Section 3.1**) and further assessment undertaken in response to the submissions received (**Section 3.2**).

3.1 Consultation

This section details consultation activities that have been undertaken during the public exhibition of the EIS and during the development of this Submissions Report.

3.1.1 Consultation during exhibition

Engagement was undertaken to support the public exhibition period between Thursday 19 June and Monday 21 July 2025. Activities focused on neighbouring businesses, sensitive receivers, First Nations stakeholders, elected officials and the broader community.

Neighbouring businesses and selected stakeholders were contacted directly via email to advise that the EIS was on exhibition, outline the next steps and offer a meeting. The Project's webpage was also updated to announce the exhibition period and to provide information about making a submission via the NSW Planning Portal.

During the exhibition period, no phone calls were received via the engagement 1800 number.

A summary of engagement activities during the EIS exhibition period is provided in **Table 6**.

Table 6 Summary of engagement during public exhibition period

Date	Communication	Stakeholder	Action taken
18 June 2025	Email exchange	Local resident	- Incoming email from local resident, informing of positive submission via Planning Portal and support for the Project. - Outgoing email shared time and process for public exhibition, including exhibition dates.
20 June 2025	Stakeholder emails	Businesses: - WestConnex Fulton Hogan - Transurban - Vicinity Centre Management (DFO) - TGood (power product supplier) Aboriginal stakeholders: - Deerubbin LALC - Gajaga Foundation Government: - Strathfield Council - Stephanie Di Pasqua MP, Member for Drummoyne (State MP) - Jason Yat-Sen Li, MP, Member for Strathfield (State MP) - Sally Sitou MP, Member for Reid (Federal MP)	- Advise EIS now on exhibition - Invite stakeholders to make a submission via NSW Planning Portal. - Outline next steps, including Submissions Report and DPHI assessment process. - Offer a meeting to discuss the EIS or any other issues.

Date	Communication	Stakeholder	Action taken
		- Sydney Olympic Park Authority (SOPA) - NSW Ambulance. Community: - Broader community (email database)	
20 June 2025	Webpage update	Broader community	- Advise EIS now on exhibition - Provide information on how to make a submission. - Outline next steps, including Submissions Report and DPHI assessment process.
1 July 2025	Email update	Gajaga Foundation Deerubbin LALC	Outgoing email to provide a project update and offer a meeting. The email also advised that the EIS is now on exhibition, shared information on how to make a submission, and outlined next steps, including the Submissions Report and DPHI assessment process.
2 July 2025	Email exchange	Vicinity Centres (DFO)	- Incoming email from Vicinity Centres advising feedback on visual impact and request for improved screening. The email also included an attachment of the formal submission lodged via the Planning Portal. - Outgoing email to confirm receipt of submission, noting that feedback and concerns will be responded to as part of the Submissions Report.

3.1.2 Consultation post EIS exhibition

Following exhibition, engagement has focused on communicating the next steps for the project to keep stakeholders informed and continue to build productive relationships with the local community. Ausgrid has undertaken the consultation activities outlined in **Table 7**.

Table 7 Summary of post exhibition engagement

Date	Communication	Stakeholder	Purpose/summary
21 July 2025	Webpage update	Broader community	To advise the exhibition period has ended

Stakeholder and community engagement will continue throughout the development process, including prior to and during the construction of the Project, should it be granted development consent.

Ongoing consultation may include key milestone updates, notifications regarding upcoming construction works and communication of the established complaints handling procedure. This would also include publishing Project updates on the Project webpage.

Subject to consent, consultation during construction, particularly with regard to any community complaints, would be guided by a Construction Environmental Management Plan (CEMP). The CEMP would be developed in conjunction with a construction contractor. Once operational, any matters raised,

or complaints received about the Project would be dealt with under Ausgrid's established community consultation policy and procedures.

3.2 Further assessment of impacts

Further assessment of impacts has been undertaken as part of this Submissions Report to respond to comments raised by government agencies and Strathfield Council.

A summary of further assessment that has been undertaken is provided in **Table 8**.

Table 8 Summary of further assessment of impacts

Assessment	Location within report	Summary of further assessment
Updated Aboriginal Cultural Heritage Assessment Report	Appendix C	The updated ACHAR comprises updates to Appendix C and Appendix E to include correspondence with all stakeholders in response to comments received from Heritage NSW.
Noise and Vibration Assessment Memorandum	Appendix D	This memo presents an updated analysis of noise and vibration impacts based on the updated Project layout and outlines additional acoustic mitigation measures to ensure compliance with the applicable criteria. The predictive noise modelling undertaken for the updated Project layout demonstrates that with the recommended acoustic mitigation implemented, compliance can be achieved with the established noise criteria at all sensitive receptors. On this basis, the Project is unlikely to result in adverse amenity impacts to nearby receptors.
Traffic Impact Assessment Memorandum	Appendix E	This memo considers the traffic and parking impacts of the updated Project layout. The impacts discussed in this memo are limited to those arising from the changes to the location of the vehicle access points. Overall, the updated Project layout represents a minor change from the scenario previously assessed in the original EIS. The updated design of the vehicle access points and the implementation of traffic management measures previously proposed would continue to allow for safe vehicle access and circulation. As such, the previous findings of the original TIA are unchanged.
Hydrology Assessment Memorandum	Appendix F	This memo included updated flood modelling and considered the hydrology impacts of the updated Project layout. The updated flood modelling indicates that during the Probable Maximum Flood (PMF) 2080 SSP5 Global Temperature Increase (GTI) scenario, shallow overland flow is expected across the battery pad, with deeper flows over adjacent roadways. The eastern portion of the battery pad may experience deeper inundation from Saleyards Creek under PMF conditions. The battery pad surface level at the lowest point is approximately 1.6 m above the 1% Annual Exceedance Probability (AEP) (1-in-100-year) 2080 SSP5 flood level. Flood impacts would be minimised through design measures employed during the detailed design stage.

Assessment	Location within report	Summary of further assessment
Visual Impact Memorandum	Appendix G	This memo considered the visual impacts of the updated Project layout. This additional assessment concluded that the findings are consistent with the Visual Impact Assessment (Appendix H) in the original EIS, with the updated layout requiring no changes to the previous visual assessment ratings or recommendations for the management of visual impacts.
Preliminary Hazard Analysis (PHA) Addendum	Appendix H	This addendum considered the hazard and risk profile of the updated Project layout. This concluded that the updated layout allows for adequate spacing to minimise the risk of fire propagation. This is consistent with the PHA included in Appendix L of the original EIS.

4.0 Response to submissions

This section provides a summary of the submissions provided, as well as a response to those submissions. An outline of the submissions received throughout the exhibition period and where they have been addressed in this report is provided in **Table 9**.

Table 9 Submissions register

Group	Name	Addressed
Government agencies	Ausgrid	Section 4.1.1
	DPHI - Crown Lands	Section 4.1.2
	DPHI – Hazards	Section 4.1.3
	Fire and Rescue NSW	Section 4.1.8
	NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) - Conservation Programs, Heritage and Regulation (CPHR) Group	Section 4.1.6
	NSW DCCEEW – Heritage NSW	Section 4.1.7
	NSW DCCEEW – Water Group	Section 4.1.5
	NSW Department of Primary Industries and Regional Development (DPIRD) – NSW Resources	Section 4.1.4
	NSW Rural Fire Service	Section 4.1.9
	Sydney Olympic Park Authority	Section 4.1.10
	Sydney Water	Section 4.1.11
	Transport for NSW	Section 4.1.12
Local government	Strathfield Council	Section 4.2
Public	Margaret Armstrong	Section 4.3
	Ian McDonald	
	Tim Chan	
	Save Our Surroundings (SOS)	
	Save Our Surroundings – Murrumbidgee	
	Save Our Surroundings – Hay	
	Save Our Surroundings – Riverina	
	Save Our Surroundings – Lancefield	
	Save Our Surroundings – Moulamein	
	Save Our Surroundings – Redbank Plains	
	Save Our Surroundings – Swan Hill	
	The Energy Realists of Australia	
	Vicinity Centres – DFO Homebush	
	Anonymous individuals (48)	

4.1 Agency submissions

4.1.1 Ausgrid

Ausgrid's submission requests that due consideration is given to compatibility of the Project with existing Ausgrid infrastructure, particularly in relation to risks of electrocution, fire risks, electric and magnetic fields, noise, and visual amenity.

Ausgrid noted:

- It should be ensured that driveways and other construction activities do not interfere with existing underground cables in the vicinity of the development. All underground services to be located and their depth should be noted using a Before You Dig Australia (BYDA) query prior to any excavation in the area
- Ausgrid must be notified of any ground level changes above Ausgrid's underground cables, in areas such as footpaths and driveways, and written approval must be obtained from Ausgrid prior to such works commencing
- Any ground anchors required in the vicinity of Ausgrid underground cables must not be installed within 300 mm of any cable. These anchors must not pass over the top of any cable
- The development must maintain minimum separation requirements between Ausgrid overhead powerlines and structures within the site throughout construction, with reference to *SafeWork NSW Document – Work Near Overhead Power Lines: Code of Practice*. The "as constructed" minimum clearances to the mains, as outlined in the *Ausgrid Network Standard, NS220 Overhead Design Manual*, must also be maintained. The developer is to verify and maintain minimum clearances onsite
- All proposed driveways shall maintain a minimum clearance of 1.5 m from the nearest face of an existing pole to any part of the driveway, including the layback, to allow room for future pole replacements. Ausgrid should be consulted if any deviation from this distance is proposed.

Response

The Ausgrid BESS team have noted this response. A BYDA query has previously been submitted to determine if there are any assets near the Project. Works associated with the Project will not interfere with existing cables in the vicinity of the development.

All minimum clearance distances and separation requirements required by Ausgrid will be adhered to.

Discussions will continue to take place internally around any further specific requirements associated with the Project and Ausgrid's surrounding assets.

4.1.2 DPHI Crown Lands

DPHI Crown Lands provided a submission in response to the public exhibition of the EIS. DPHI Crown Lands noted that no Crown land, roads or waterways in the vicinity of the proposal are affected by the Project. As such, Crown Lands provided no further comments that require attention as part of this Submissions Report.

4.1.3 DPHI Hazards

Comment

DPHI Hazards reviewed the EIS and the Preliminary Hazard Analysis (Appendix L of the EIS) and provided the following submission in response:

- DPHI Hazards is satisfied the PHA is consistent with the actual battery energy capacity of 431 MWh, to account for losses and inefficiencies, and if the proposal is approved, recommends conditioning the approval to reflect the 431 MWh capacity
- The PHA is generally in accordance with the Department's *Hazardous Industry Planning Advisory Paper No. 6* (HIPAP No. 6) and Multi-Level Risk Assessment (MLRA). DPHI Hazards considers the level 1 approach undertaken for the EIS is appropriate given surrounding land use and separation to residents and sensitive receivers

- DPHI Hazards is satisfied with the fire and explosion impacts identified in the hazardous event analysis. A separation distance of 16 metres from a battery unit to the site boundary is considered a reasonable separation to ensure radiant heat levels of concern do not extend beyond the boundary
- In relation to toxic impacts, the DPHI Hazards team considers it unlikely that hydrogen fluoride concentrations would reach levels of concern, given the separation distance to the nearest receptor, provided that any fire event remains confined to a single battery enclosure
- DPHI Hazards consider that a front-facing separation distance between battery units of 2.44 m is inconsistent with the 3 m recommendation provided in NFPA 855: Standard for the Installation of Stationary Energy Storage Systems, which is generally accepted by DPHI Hazards as a reasonable separation distance. DPHI Hazards requested further information to provide justification for the proposed separation of the batteries by 2.44 metres. In addition, DPHI Hazards requested to reexamine the area allocated for the batteries and demonstrate that the layout allows for adequate spacing to minimise the risk of fire propagation.

Response

In response to comments raised by DPHI Hazards, the area allocated for the batteries has been re-examined and the separation distances for the side, back, and front of the Megapack 2 XL units have been considered when developing the updated Project layout. The updated Project layout increases the front-facing separation distance between containerised battery units to 3 m, in line with the recommendation provided in NFPA 855. The updated layout and increased separation distance has been reviewed by Planager in the PHA Addendum (see **Appendix H**).

The PHA Addendum identifies that the updated Project layout results in a slight decrease in distance between the nearest containerised battery unit and the site boundary (from 16 m to approximately 12 m), however the heat radiation in a worst-case credible enclosure fire remains below the injury risk criteria specified in *Hazardous Industry Planning Advisory Paper No 4 – Risk Criteria for Land Use Safety Planning* (HIPAP No.4) and is not likely to be significant. Therefore, the updated layout allows for adequate spacing to minimise the risk of fire propagation.

4.1.4 DPIRD – NSW Resources

NSW Resources has reviewed the information supplied in relation to the Project and based on the review has no specific comments in relation to *Mining Act 1992* considerations and raises no issues regarding the Project at this stage.

4.1.5 Fire and Rescue NSW

In the review of the EIS, FRNSW noted the fire hazard posed by BESS facilities generally and requested that additional fire safety and management measures be included. FRNSW recommended the following measures be incorporated into conditions of consent for the Project (if approved):

- Prior to construction a Fire Safety Study (FSS) is developed in accordance with the requirements of the *Hazardous Industry Planning Advisory Paper No.2 - Fire Safety Study Guidelines* (HIPAP No.2) and submitted to FRNSW for review. The FSS is to be used to inform the design and as such it is FRNSW's position that the FSS be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and/or Performance-Based Design Brief/Fire Engineering Brief Questionnaire (FEBQ). The FSS should be prepared in accordance with the FRNSW *Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations*
- Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with *Hazardous Industry Planning Advisory Paper No.1: Emergency Planning Guideline* (HIPAP No.1)
- Prior to occupation or commissioning an Emergency Services Information Package (ESIP) is developed for the site in accordance with FRNSW *Fire Safety Guideline – Emergency services information package and tactical fire plans*.

Response

The comments made by FRNSW have been noted and Ausgrid accepts that a FSS, EP and ESIP may be included as conditions of consent for the Project. In such an event, Ausgrid requests that the conditions of consent specify that the FSS be developed in accordance with the requirements of the HIPAP No.2 and submitted to FRNSW for review, prior to energisation of the batteries. Mitigation measure HR-3 in **Appendix B** has been revised to reflect the wording of the expected condition. Two new mitigation measures (HR-15 and HR-16) have been included to specify the development of an EP and ESIP.

4.1.6 NSW DCCEE – Conservation Programs, Heritage and Regulation Division (CPHR)

CPHR has reviewed the EIS, including Appendix E – Biodiversity Development Assessment Report and Appendix K – Water Impact Assessment (flood assessment report) and provided comment in relation to flooding and biodiversity.

Comment

In relation to flooding risks, the flood compatibility of the development, the planning horizon, the flood model and flood conditions, the proponent should:

- Validate the baseline flooding characteristics of the site by comparing them with Strathfield Council's updated 2024 flood modelling
- Review and refine the flood modelling to address any anomalies in the current flood assessment, as CPHR have identified that the flood modelling results appear identical across all post-development scenarios
- Adopt 2100 conditions as the planning horizon
- Adopt the probable maximum flood (PMF) level as the flood planning level for the proposed BESS to ensure long-term operation, safety and compliance with flood management guidelines
- Arrange the layout for the BESS, including battery pads and arrays, in areas that are not flood prone and impacted by flooding under the PMF
- Provide detailed information on the flood parameters, boundary conditions and assumptions used for setting up the localised flood model
- Review the modelling work undertaken, update the localised flood model to ensure boundary conditions are correctly applied and explore flood risk management options at the site.

Response

Strathfield Council is currently finalising a flood risk management study using updated climate change guidance in accordance with Version 4.2 of ARR2019 (and sea level rise conditions) for the Powells Creek and Saleyards Creek Catchment. This flood risk management study has not yet been published by Strathfield Council and therefore is not available for validation purposes.

The updated flood assessment included in Appendix A of the Hydrology Assessment Memo in **Appendix F** includes updated flood modelling and considers the hydrology impacts of the updated Project layout. The updated flood modelling indicates that during the PMF 2080 SSP5 GTI scenario, shallow overland flow is expected across the battery pad, with deeper flows over adjacent roadways. The eastern portion of the battery pad may experience deeper inundation from Saleyards Creek under PMF conditions. The battery pad surface level at the lowest point is approximately 1.6 m above the 1% AEP (1-in-100-year) 2080 SSP5 flood level.

The Flood Prone Land Package 2021 noted by CPHR does not specify a requirement for BESS infrastructure to be located above the PMF level. Rather, it notes that *consideration* of the PMF is required along with consideration of the flood function and behaviour of the land. Flood impacts would be minimised through design measures employed during the detailed design stage.

As noted in the Scoping Report (AECOM, 2024), the expected operational lifetime of the Project is approximately 50 years, during which the battery units and/or other Project components may be replaced or upgraded to extend this timeframe, or removed, after which the land would be rehabilitated to be consistent with the surrounding area. Any replacement or upgrade of the Project after 50 years

would be subject to additional planning approval and is outside the scope of this assessment. As such, a design life of 50 years was assumed, and 2080 was selected as the planning horizon for the site. Further details on the flood parameters, boundary conditions and assumptions used for setting up the localised flood model are included in the updated flood assessment in Appendix A of the Hydrology Assessment Memo in **Appendix F** to this report.

Comment

CPHR advise the Biodiversity Development Assessment Report (BDAR) adequately addresses the SEARs. CPHR request that the BDAR explains the recent vegetation clearing that occurred between April and June 2024.

Response

Section 2.2.2 of the BDAR explains the vegetation clearing that occurred between April and June 2024. Ausgrid undertakes routine vegetation maintenance, including trimming, to ensure a safe and reliable electricity network. This maintenance involves clearing vegetation around network infrastructure, such as the existing Mason Park STSS and associated assets, to protect essential infrastructure.

4.1.7 NSW DCCEE – Heritage NSW

Comment

Heritage NSW requested additional information to inform their advice on whether the Aboriginal Cultural Heritage Assessment Report (ACHAR) adequately addresses the SEARs. Additional information requested included:

- Updating the ACHAR to include an extensive Aboriginal Heritage Information Management System (AHIMS) search, which encompasses an area large enough to allow adequate landscape interpretation and where possible analysis of the distribution of previously recorded sites, and the use of this search to inform predictive modelling for the site
- Updating Appendix C of the ACHAR to demonstrate that all Aboriginal stakeholders identified by statutory agencies were invited to register for consultation
- Updating Appendix E of the ACHAR to demonstrate that the project methodology was sent to Aragung Aboriginal Cultural Heritage Site Assessments and Ginninderra Aboriginal Corporation.

Response

An updated basic and extensive search has been carried out by Apex Archaeology to cover a search area of approximately 5 km by 4 km, which identified one single Aboriginal site. This site is known to comprise an artefact deposit with some shell associated, located within Phillips Park on a tributary of Haslams Creek. This site is located more than 2 km from the Project in a different environmental context. No other sites were identified within the search area.

Relevant updates to appendices C and E of the ACHAR have also been made to address the comments made by Heritage NSW. The updated ACHAR is provided in **Appendix C**.

4.1.8 NSW DCCEE – Water Group

The Water Group of NSW DCCEE has reviewed the EIS and advises there are no issues which require comment.

4.1.9 NSW Rural Fire Service

The NSW Rural Fire Service has reviewed the information provided and advises that there are no specific concerns with the proposal relating to bush fire protection.

4.1.10 Sydney Olympic Park Authority

The Sydney Olympic Park Authority confirmed it has no comments on the SSDA.

4.1.11 Sydney Water

Comment

Sydney Water's preliminary assessment indicates water servicing should be available for the proposed development. However, amplifications, adjustments, deviations and/or minor extensions may be

required. Detailed requirements will be provided at the Section 73 application stage and Sydney Water advise that the proponent applies directly to Sydney Water for a Section 73 Compliance Certificate as soon as feasible.

Sydney Water require conditions relating to Section 73 Compliance Certificate and Building Plan Approval be included in the development consent.

Response

The comments in relation to a Section 73 application and requirements for development consent conditions are noted.

4.1.12 Transport for NSW

Comment

Transport for NSW (TfNSW) has reviewed the EIS and provides the following suggested consent conditions for DPHI's consideration:

- The applicant shall obtain TfNSW approval under section 138 of the *Roads Act 1993* for all civil works and structures along the eastbound on-ramp onto the Western Motorway (M4) and Access Road. All civil works undertaken shall be to the satisfaction of, and at no cost to, TfNSW. The applicant shall also obtain agreement for use of the M4 and Access Road from WestConnex/Transurban, as the manager of these roads
- A Plan of Management (PoM), and risk assessment for the construction, operation and decommissioning phases shall be undertaken by the applicant. The applicant, in preparing the PoM, shall demonstrate to the Planning Secretary that WestConnex/Transurban have been engaged in the preparation of the PoM and are satisfied with the PoM. The PoM shall ensure that deliveries are organised outside of transport peak periods and any other management strategies to ensure that road safety and efficient transport operations is maintained. The PoM shall outline the process to ensure deliveries by heavy vehicles are coordinated and managed effectively so that two delivery vehicles do not arrive at the same time or delivery vehicles and/or do not arrive when a B-double is exiting the Access Road/waiting at the intersection to turn out (which would be beyond manned traffic control)
- Prior to the issue of any construction certificate the applicant shall prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW and WestConnex/Transurban. The CPTMP needs to specify matters including, but not limited to, the following:
 - A description of the development
 - Location of any proposed work zone(s)
 - Details of crane arrangements including location of any crane(s) and crane movement plan
 - Haulage routes
 - Proposed construction hours
 - Predicted number of construction vehicle movements, detail of vehicle types and demonstrate that proposed construction vehicle movements can work within the context of road changes in the surrounding area, noting that construction vehicle movements are to be minimised during peak periods
 - Construction vehicle access arrangements
 - Construction program and construction methodology, including any construction staging
 - A detailed plan of any proposed hoarding and/or scaffolding
 - Measures to avoid construction worker vehicle movements within the precinct
 - Consultation strategy for liaison with surrounding stakeholders
 - Identify any potential impacts to general traffic, cyclists, pedestrians, and bus services within the vicinity of the site from construction vehicles during the construction of the proposed

works. Proposed mitigation measures should be clearly identified and included in the CPTMP; and

- Identify the cumulative construction activities of the development and other projects within or around the development site. Proposed measures to minimise the cumulative impacts on the surrounding road network should be clearly identified and included in the CPTMP.
- Submit a copy of the final plan to TfNSW for endorsement
- A Road Occupancy Licence (ROL) should be obtained from Transport Management Centre (TMC) for any works that may impact on traffic flows on the Western Motorway on-ramp during construction activities.

TfNSW comment that the operational phase of the Project will not have a detrimental impact to the surrounding classified road network.

Response

During a meeting held with TfNSW, Ausgrid confirmed that no works will be undertaken on the eastbound on-ramp of the Western Motorway (M4) and therefore a permit under section 138 of the *Roads Act 1993* is not required. Ausgrid are in the process of finalising a lease agreement with Transurban for use of the M4 eastbound on-ramp and Access Road. Ausgrid accepts that finalising the agreement with Transurban may form a condition of consent.

Ausgrid will incorporate the components of a PoM into the CPTMP. Mitigation measure T-1 has been updated in **Appendix B** to reflect this requirement by TfNSW.

Mitigation Measure T-1 in the EIS specified the preparation of a Construction Traffic Management Plan. This mitigation measure has been updated in **Appendix B** to reflect the request by TfNSW. However, some of the matters requested by TfNSW to be included in the CPTMP have already been provided in the EIS, are considered impractical, or not required in the CPTMP. This includes a detailed plan of any proposed hoarding and/or scaffolding, measures to avoid construction worker vehicle movements within the precinct, potential impacts to general traffic, cyclists, pedestrians, and bus services, and cumulative construction activities. Therefore, these items have not been included in the updated Mitigation Measure T-1 in **Appendix B**.

It is noted that a ROL would be required for any works that may impact on traffic flows on the Western Motorway on-ramp during construction activities. An ROL would be obtained if required, and details would be included in the CPTMP.

4.2 Strathfield Council

Strathfield Council provided a submission in response to the public exhibition of the EIS. In general, Strathfield Council remains supportive of the Project though is seeking better resolution of issues relating to urban design, tree management, traffic, site contamination, and development engineering.

Comment – Urban Design

- Strathfield Council requests further visual impact assessment to adequately demonstrate how the Project will integrate with the surrounding streetscape, with particular regard to surrounding residential areas and the planned changes associated with the Homebush TOD precinct. The visual assessment should consider views to the site taken from the additional heights anticipated as part of the future TOD SEPP.
- Council requests additional visual impact assessment which considers views with and without tree cover on the site to provide a more accurate representation of how the development will appear from all views looking toward the site.
- In addition, Council requires more appropriate and considered external fencing treatments to enable the works to better integrate with the surrounding streetscape.

Response – Urban Design

Further visual impact assessment has been undertaken to consider the planned changes associated with the Homebush TOD precinct. The assessment in the Visual Impact Assessment Memo has not

considered the positive visual impact of the planned replacement tree cover on the site so as to present a worst-case scenario. The updated assessment is included in the Visual Impact Assessment Memorandum in **Appendix G**, which also includes further details around the proposed external fencing treatments.

Comment – Tree Management

- Where trees are proposed to be removed Strathfield Council requires that replacement canopy tree planting should be provided at a rate of 2:1 to ensure no net loss of canopy coverage.
- A draft Landscape Plan should be provided with evidence that it has been developed in consultation with affected landowners.
- Visualisations for the Project show no landscaping within or to the perimeter of the site, which Strathfield Council consider to be an unacceptable outcome. Strathfield Council requires that the Landscape Plan should include retention of existing canopy tree plantings (particularly focusing on retention of canopy tree plantings around the perimeter of the site) to minimise the appearance of hardstand areas on the site, as viewed from its immediate surrounds.

Response - Tree Management

- Ausgrid will further refine the Project Area required for construction and minimise vegetation removal where possible. In accordance with mitigation measure B-3 in the EIS, trees will be retained within the site where possible to minimise loss of urban canopy. Particular consideration will be given to retaining canopy tree plantings around the perimeter of the site, where feasible.
- The feasibility of perimeter planting will be considered in conjunction with infrastructure fire safety requirements. Where perimeter planting is considered feasible, a Landscape Plan will be developed prior to construction detailing planting areas. The plan will be implemented during construction.
- Project fire safety requirements, including asset protection zones, may result in replacement planting at a ratio of 2:1 being sought in an alternative location, subject to consultation with Strathfield Council.

Comment – Traffic Assessment

As the Project impacts the State Road Network, Strathfield Council would be guided by comments provided by TfNSW. A response to the submission by TfNSW is provided in **Section 4.1.12**.

Strathfield Council expects the following details be considered when preparing the CPTMP for the Project, which it requests to review:

- Details of all traffic types and volumes likely to be generated during construction and operation, including a description of haul routes and vehicle types. Traffic flows are to be shown diagrammatically to a level of detail sufficient for easy interpretation. An analysis of the existing traffic network, including the road hierarchy, current and future daily peak hour (light and heavy) vehicle movements and existing performance levels of nearby intersections. Homebush Bay Drive/ slip road off eastbound on-ramp to Western Motorway (M4) Centenary Drive/ Homebush Bay Drive/ Western Motorway
- Plans demonstrating how all vehicles likely to be generated and will access the site during construction and operation and awaiting loading, unloading, or servicing can be accommodated on the site to avoid queuing in the street network
- A forecast of additional daily and peak hour vehicle movements because of the proposal and identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cycle conflict)
- Undertake traffic and network modelling to understand the impacts of the development site and intersections (using SIDRA modelling or similar at five year intervals), plus any traffic changes as a result any planned or committed road projects
- Proposals to mitigate any traffic impacts, including intersection upgrades to achieve acceptable performance

- Detailed plans of the site access and proposed layout of the internal road and pedestrian network and parking on site in accordance with the relevant Australian Standards and Council's DCP
- Swept path diagrams depicting vehicles entering, exiting, and manoeuvring throughout the site.

Response – Traffic Assessment

The majority of Strathfield Council's requests are included in the existing TIA (Appendix J of the EIS). Mitigation measure T-1 in the EIS involves the preparation of a Construction Traffic Management Plan. This mitigation measure has been updated in **Appendix B** in response to the submissions from Strathfield Council and TfNSW, to ensure the expected items are included in the CPTMP, where relevant. However, where requested details are already provided in the TIA in the EIS, these will not be repeated in the CPTMP.

Comment – Development Engineering

Strathfield Council notes that the water impact assessment for the Project did not provide any on-site detention of stormwater, although the impervious area is going to be increased substantially. This is required to reduce peak flood depth for Saleyards and Powells creeks and to limit the discharge from the site to that of undeveloped site.

Response – Development Engineering

It is noted that the basis of the submission provided by Strathfield Council is the potential for an increase in imperviousness associated with the Project (involving provision of permanent hardstand areas for battery pads, ancillary facilities and internal site roads and temporary construction laydown areas). Field inspections and aerial imagery show vegetation growth throughout the site, providing the appearance of a substantially pervious existing catchment condition, as shown in **Figure 6**.

However, it is noted that the general surface conditions across a large portion of the site actually consist of disused sealed car park area with some vegetative growth within and surrounding. This is demonstrated by an aerial image from 2014 (**Figure 7**), where the impervious sealed car park area is visible. This area was historically used by the adjacent DFO warehouse as an overflow car park, though has become overgrown in recent years. A small section of the car park area (that being around the transmission line easement) was historically landscaped and remains vegetated.

Although vegetation is currently regrowing sporadically throughout the car park area, it is still considered to primarily comprise impervious surface. As such, during large rainfall events, rainfall losses are anticipated to be generally consistent with those of an impervious area, given that the degraded car park surface is still providing a barrier to water infiltration.

Additionally, even if the presence of vegetation were having some effect on hydrologic properties, the current approved activities at the site (and therefore the assumed assessment baseline) consists of a sealed carpark.

On this basis, a substantial increase in imperviousness is not anticipated to be associated with the Project, and onsite stormwater detention is not considered necessary.



Figure 6 Aerial imagery dated 28 May 2025 depicting the degraded car park surface (Nearmap, 2025)



Figure 7 Aerial imagery dated 22nd April 2014 depicting the sealed carpark surface across the site (Nearmap, 2025)

Comment – Site Contamination

Strathfield Council acknowledges the data gaps in the Preliminary Site Investigation (PSI) and detailed Site Investigation (DSI) due to access constraints. Council suggests that the data gaps need to be addressed before conclusions can be made regarding site suitability in the context of land contamination and the management of acid sulfate soils.

Response – Site Contamination

As noted in mitigation measure LSC-1, a Supplementary Contamination Assessment (SCA) will be undertaken to address data gaps once access to previously inaccessible areas becomes available.

If contamination risks remain, a Remedial Action Plan (RAP) and/or an Acid Sulfate Soils Management Plan (ASSMP) will be prepared prior to construction to manage risks during works, as set out in mitigation measure LSC-2. All further work will be undertaken by a qualified environmental consultant.

4.3 Public submissions

A total of 61 public submissions were received during the EIS public exhibition period, including one submission in support, 59 submissions objecting to the Project and one local business providing a comment to the Project.

Each public submission was reviewed in detail to identify and understand the issues raised. These issues were then analysed and categorised into common themes to enable a coordinated response. This means that while the exact wording of a particular submission may not be presented in the summary of the issue, the intent of each individual issue raised has been captured and a corresponding response provided for all issues. The key themes in **Table 10** were identified following a review of the submissions received from the community. A response to each of these key themes has been provided in the following sections.

Table 10 Key submission themes

The Project
Design elements
Project lifecycle
BESS technology
Justification and evaluation of the Project
Site selection and Project alternatives
Project justification
Modern slavery and supply chain ethics
Community and stakeholder consultation
Level of public consultation
Engagement with Indigenous groups
Environmental impacts
General environmental impacts, management and monitoring
Potential hazards – Combustion and fire risk
Potential hazards – Emergency response
Traffic and transport
Chemical waste
Biodiversity and Ecologically Sustainable Development
Agriculture

Social and economic impacts
Amenity impacts
Impact on property values
Insurance and compensation
Job availability
Costs
Beyond the scope of the Project
National security and cybersecurity risk

4.3.1 The Project

4.3.1.1 Design elements

In relation to the design of the Project, one submission queried whether there would be a diesel generator on-site.

One submission questioned the measures proposed to prevent unauthorised access or sabotage of the infrastructure.

Response

As stated in Section 1.3.3 of the EIS (Key Features of the Project), a backup diesel generator would be included as part of the ancillary infrastructure and would be located onsite to provide backup power for critical operations, such as loss of supply to the BESS during operation of the Project, which is considered to be a very rare event. Section 3.3.3 of the EIS also identifies that diesel generators would be used to support construction.

To ensure the security of the site, as outlined in Section 3.2.2 of the EIS, permanent security fencing, comprising 2.4 m high boundary security chain wire fencing and gates, would be installed around the perimeter of the BESS. CCTV would also be installed.

4.3.1.2 Project lifecycle

Two submissions questioned the lifespan of the Project, one suggesting the BESS has a lifespan of 8 to 12 years. Two submissions raised concerns around uncertainty at the end of the Project's life, including how the batteries will be disposed of.

Response

The Project is intended to have an operational life of up to 50 years, with typical replacement of equipment taking place during this period. At the end of a battery's life, it will be recycled at an approved recycling facility or returned to the manufacturer for refurbishment/remanufacturing (e.g. Tesla remanufacturing facilities in Australia). At recycling facilities, batteries are dismantled with materials reclaimed through mechanical, hydrometallurgical and pyrometallurgical processes. Recycled materials can be reintegrated into the battery manufacturing process, reducing reliance on virgin resources. The CSIRO (2023) states that 95% of battery components can be recovered for alternative use.

It is important to note that with the growth in battery usage being driven by electrification of our economy, end-of-life battery recycling is becoming increasingly viable (Zhao et al., 2020). This is expected to continue as the remanufacturing capacity, regulations and technology develop over the coming years (Sheth et al., 2023).

During decommissioning, above ground components would be removed, and the land rehabilitated. Prior to demolition, existing infrastructure, plant and equipment would be assessed and categorised based on whether the materials can be reused, repurposed, or recycled. Materials able to be reused, repurposed, or recycled will be preferentially distributed off-site to other projects, suppliers, or recycling facilities.

4.3.1.3 BESS technology

Some submissions questioned the renewable credentials of the Project, arguing that a BESS does not generate power itself and is dependent on external sources of energy, often fossil-fuel based, suggesting that the technology is not “clean” or “green”.

A number of submissions queried the Project’s suitability for continuous use, expressing scepticism about BESS enabling 24/7 renewable energy supply, especially for large-scale or industrial needs. Submissions stated that the Project’s ability to supply power is limited and variable (e.g., only enough for 30,000 homes for a few hours) and incapable of supplying typical grid demand.

Concerns were raised around efficiency and loss of energy during the storage and release cycle, with one submission questioning how much energy would be lost in this process. Another submission queried who would be responsible if a battery failed and caused a power outage.

One submission commented on the operational energy requirements to operate the BESS, including the need for air conditioning.

Response

It is correct that BESS does not generate electricity itself. However, its role is pivotal in enabling the integration of renewable energy sources such as solar and wind into the grid. By storing excess energy during peak generation periods and releasing it when demand is high or generation is low, the BESS helps smooth out the variability inherent in renewables. This capability reduces reliance on fossil fuel-based generation and supports a less carbon intensive energy mix.

The renewable credentials of a BESS are therefore tied to the source of the energy it stores. In this case, the Project is designed to complement and enhance the use of renewable energy, not replace generation. When paired with renewable generation, the BESS becomes a key enabler of a low-emission energy grid.

Whilst BESS have limitations in terms of duration and capacity, technological advancements and scaling strategies are rapidly improving their capability. Modern utility-scale BESS installations can provide several hours of continuous power and are increasingly being deployed to support industrial operations, grid stability, and emergency backup. The Project’s design considers these factors, and its capacity is tailored to meet specific grid support functions, including peak shaving, load shifting, and frequency regulation. Importantly, BESS are not intended to replace baseload generation but to complement it, especially in systems transitioning to high renewable penetration. It provides flexibility and reliability that are essential for industrial users, particularly when integrated with other renewable and dispatchable energy sources.

Energy losses during the storage and release cycle are a known factor and well understood. The Project includes 112 lithium iron phosphate (LiFePO₄) containerised battery units with a total capacity of 431 MWh. However, the registered capacity of the BESS with AEMO would be 400 MWh, to account for losses in the system. These losses are considered in system design and are outweighed by the benefits of grid stability, renewable integration, and reduced curtailment of clean energy generating assets.

Operational energy requirements, including cooling integrated systems, are necessary to maintain battery performance and safety. These systems are designed to be energy-efficient and are factored into the overall energy balance of the Project.

Regarding reliability, BESS are equipped with advanced monitoring, control and safety systems to prevent failures and mitigate risks. In the unlikely event of a system failure, responsibility lies with the operator in accordance with regulatory frameworks and contractual obligations. The Project includes robust risk management and contingency planning to ensure continuity of supply and safety.

Responsibility for power outages caused by a battery failure depends on the nature of the failure and the roles of the parties involved in the energy infrastructure; for example, if the failure is due to operational issues, such as poor maintenance, software faults, or technical malfunction, then the BESS operator would typically be held responsible. The integration of the BESS to the wider network is designed and modelled by the network operator to have adequate primary and secondary protection systems such that a failure of the BESS is unlikely to impact supply to other customers or cause wider network stability issues. If the failure does affect the broader transmission network or is linked to how

the battery integrates with the grid, then the network operator may share responsibility. Any incidents would be fully investigated.

4.3.2 Justification and evaluation of the Project

4.3.2.1 Site selection and Project alternatives

A number of submissions expressed discontent with the Project being located in an urban area, close to a major transport interchange, fuel and freight corridors, DFO Homebush, other businesses and homes. Their primary objection was that they consider the BESS to be too hazardous in terms of fire and explosion risk.

One submission queried whether safer, more sustainable alternatives to lithium-ion battery storage have been considered.

Response

Ausgrid acknowledges the concerns raised about the location of the proposed Project and the potential safety risks. Site selection for the BESS was guided by a range of technical, environmental, social and strategic criteria, including proximity to existing grid infrastructure, land availability and the ability to support network reliability and renewable energy integration.

The site possesses attributes that make it an optimal location for the development of a BESS, including:

- Located close to the existing electricity transmission network
- The existing transmission network has sufficient capacity to support the integration of the BESS without requiring significant infrastructure upgrades
- The land is owned by Ausgrid and sized adequately to accommodate a BESS and associated infrastructure
- Suitably zoned for this type of development.

Safety is a core consideration in the planning and design of BESS and has been considered extensively in the Project's planning process. Hazards and risks were considered in detail within the PHA prepared as part of the EIS. As outlined in the PHA and PHA addendum, the Project will incorporate rigorous fire protection measures and emergency response protocols. The design will comply with all relevant Australian standards and guidelines. Prior to energisation of the batteries, a FSS will be prepared in accordance with the requirements of HIPAP No.2 and *Fire Safety Guideline Technical Information: Large scale external lithium-ion battery energy storage systems – Fire safety study considerations* (FRNSW, 2023). The FSS will be prepared in consultation with FRNSW. As such, the risk of fire or explosion to nearby properties and people will be suitably managed.

Ausgrid propose to install LiFePO₄ batteries for the Project, which use abundant and non-toxic materials such as iron and phosphate. LiFePO₄ batteries are more sustainable and ethically sourced than traditional cobalt- or nickel-based lithium-ion batteries. LiFePO₄ batteries are the most advanced technology currently available for grid storage, therefore alternatives were not considered.

4.3.2.2 Project justification

Several submissions expressed strong objections to the Project, questioning its overall justification and underlying values. Key concerns included its viability, contribution to energy security, potential to reduce greenhouse gas emissions, intensive resource requirements, and the extent of its benefit to Australia.

One submission supported the Project, highlighting the importance of energy storage in strengthening Australia's renewable energy transition. It noted that storing surplus solar and wind energy helps balance supply and demand, reduces waste, and improves grid stability, ultimately contributing to a cleaner, more resilient energy system.

Many submissions argued that the Project offers no practical local or national benefit, citing the absence of electricity generation as part of the Project, as well as its lack of backup capacity or meaningful contribution to energy reliability. Some commenters deemed the Project to be environmentally harmful, economically unjustifiable, and an inefficient use of land.

Submissions raised concerns about whether the Project aligns with broader strategic energy and planning policies. One submission questioned whether the Project supports Sydney's long-term renewable energy goals or merely serves as a short-term solution without lasting value.

Submissions also contended that the Project does not align with goals related to environmental protection, cultural respect, or energy reliability. It was asserted that the BESS would result in adverse environmental impacts, is not in the public interest, and fails to serve the greater good. A number of submissions went further, claiming the Project is deliberately designed to harm Australia, and that renewable energy undermines the nation's economic prosperity and productivity.

Opposition to BESS was also based on the argument that Australia already has abundant coal resources, which are exported internationally, suggesting that additional infrastructure like BESS are unnecessary. Concerns were raised about reliance on variable energy sources, with coal-fired power asserted to be the only stable and reliable option. Batteries and similar technologies were described as inadequate and counterproductive to grid reliability. Consequently, some submissions advocated for expanding coal generation capacity instead of investing in battery storage.

A few submissions challenged the claim that the Project would reduce greenhouse gas emissions or have any measurable impact on global climate trends. They noted that CO₂ emissions continue to rise globally despite the growth of renewable energy and suggested that the Project may actually contribute to increased atmospheric CO₂.

Additionally, three submissions raised concerns about the lack of independent oversight and technical audit, particularly regarding safety, engineering integrity, economic justification, and risk assessment.

Response

Ausgrid acknowledges the concerns raised in submissions regarding the justification of the Project and recognises the importance of ensuring that energy infrastructure developments are not only technically viable but also aligned with broader environmental, economic, and social values.

BESS are not just a stop-gap; they are increasingly becoming a core part of long-term energy infrastructure. While it does not generate electricity itself, its role is to store excess energy, particularly from renewable sources such as solar and wind, and release it when demand is high or supply is low. As such, the Project supports the transition to a more resilient and sustainable energy system by enhancing grid stability, reducing reliance on fossil fuels, and supporting the integration of renewable energy into the grid. This strategy is backed by policy at all levels of government, including NSW's Electricity Infrastructure Roadmap.

Contrary to concerns raised, BESS projects contribute meaningfully to energy security by providing fast-response dispatchable power, frequency regulation, and grid balancing services. These functions are critical in modern energy systems, particularly as Australia moves toward decarbonisation and decentralisation of energy generation.

The Project supports national and international efforts to reduce greenhouse gas emissions by enabling greater use of renewable energy throughout the day. This directly contributes to Australia's long-term energy strategy, as reflected in government policy, which is focused on transitioning to these cleaner, more flexible energy systems.

While rising global CO₂ emissions remain a challenge, tangible actions such as deploying energy storage infrastructure are essential to the broader response. The Project would directly contribute to this by extending the reach of renewable energy into the evening on most days and thereby helping to reduce emissions by displacing fossil fuel-based generation during these periods.

Overall, the BESS has been strategically located and sized based on detailed technical assessments, including load forecasting, network constraints, resource requirements, safety and cost-benefit analysis. These assessments demonstrate that the Project is both technically and economically viable and aligns with state and national energy transition goals. The EIS outlines the Project's long-term operational and environmental benefits, particularly its support for a more sustainable and reliable electricity network.

The Project has been subject to rigorous planning, environmental, and technical assessment, including safety, engineering integrity, and risk management. Independent oversight is embedded in the regulatory framework, and ongoing compliance with relevant standards and guidelines is required throughout the Project lifecycle.

4.3.2.3 Modern slavery and supply chain ethics

Ten community submissions commented on a reliance on unethical supply chains and modern slavery in under-developed countries for the extraction of minerals and raw materials used in the manufacture of the BESS. Submissions referred to cobalt and nickel as an input into lithium batteries, noting a significant proportion of mined cobalt comes from artisanal mining in countries such as the Democratic Republic of Congo and China. Overall, these submissions expressed concerns about ethical sourcing and compliance with modern slavery laws, emphasising the need for transparency and ethical practices in supply chains.

Response

The Project will be comprised of LiFePO₄ battery units. These battery units do not contain cobalt.

Ausgrid's Modern Slavery Statement (Ausgrid, 2024), which has been developed in accordance with the *Modern Slavery Act 2018*, demonstrates a robust commitment to addressing modern slavery risks within its operations and supply chain. Ausgrid has implemented several measures that directly address the concerns surrounding modern slavery, including:

- Ausgrid has published a Human Rights Policy that outlines its commitment to respecting and supporting human rights across its operations and supply chain. This policy applies to all employees, business partners, consultants, contractors, suppliers, and any person undertaking work for the Ausgrid Group. It ensures that all stakeholders are aware of and adhere to ethical practices
- The Ausgrid Group Modern Slavery Remediation Guideline was established to ensure remediation for individuals affected by modern slavery incidents within its operations or supply chain. This includes a structured process for reporting, investigating, and addressing such incidents, emphasising complainant safety and desired outcomes. Ausgrid has implemented mandatory training modules for employees and contractors to educate them about modern slavery and their rights. This includes a Modern Slavery Introduction training module and updates to onboarding procedures for contractors
- Ausgrid conducts Modern Slavery Supplier Deep Dives to assess and improve supplier practices regarding Modern Slavery. This initiative fosters collaboration and ensures suppliers align with Ausgrid's ethical standards.

These actions reflect Ausgrid's dedication to mitigating modern slavery risks and addresses the concerns raised in the submissions. Ausgrid will ensure these policies are implemented in the procurement of Project infrastructure.

4.3.3 Public and stakeholder consultation

In total, eight submissions were received in relation to the level of public consultation held for the Project and engagement with Indigenous groups.

One submission suggested that no real consultation had been carried out with the community and other submissions were concerned that residents and schools in the local area had not been properly informed about the Project. Two submissions queried the point at which the public was informed about the Project.

Two submissions were received around engagement with Indigenous groups, one querying whether consultation with Indigenous groups about the cultural impact of the Project had been undertaken and one commenting that no real consultation had been undertaken with Indigenous Elders.

One submission questioned whether Strathfield Council had a meaningful role in assessing or approving a facility perceived as high-risk. Additionally, there was a call for greater community involvement in decision-making for the Project, with a suggestion that a community advisory panel should be involved.

Response

Ausgrid is committed to establishing and maintaining authentic relationships with interested stakeholders and the community through effective communication and engagement. Throughout the Project's development, Ausgrid has aimed to demonstrate a commitment to transparency,

accountability and meaningful community engagement that adequately informs the community, solicits relevant feedback and contributes to shaping the Project's design and development.

Chapter 5 of the EIS provides a detailed account of all consultation that has been carried out for the Project to date, including with local residents, schools and Indigenous stakeholders. Further information is also included in **Section 3.0** of this Submissions Report.

It is noted that two community submissions which questioned whether local residents were consulted during the planning process were received from Barham and Moulamein, both located over 450 km from the Project.

As the Project is valued at over \$30 million and meets other criteria (e.g. over 30 MW capacity), it is classified as SSD, and as such is assessed under Part 4, Division 4.7 of the EP&A Act. In this case, the Minister for Planning (or their delegate) is the consent authority and not the local council. Despite this, local councils and the community have both been formally consulted during the Project development and assessment process. These parties have been invited to make submissions on the Project, particularly regarding local planning controls, infrastructure, and community impacts.

4.3.4 Environmental impacts

4.3.4.1 General environmental impact, management and monitoring

Three submissions stated general environmental impact concerns, particularly in relation to the Project causing environmental risk, and irreversible and significant long-term environmental damage.

One submission queried what independent body will monitor ongoing safety and environmental impact once the BESS is operational.

Response

The EIS considered all relevant potential environmental, social and economic impacts associated with the Project. The EIS also proposed appropriate mitigation measures to manage potential adverse impacts during construction, operation and decommissioning. On this basis, the EIS determined that any residual impacts would have a low to negligible impact on relevant environmental, social and economic factors.

The EIS also outlined the Project would provide environmental, social and economic benefits to the Greater Sydney region and to NSW more broadly, and that these outweigh the adverse impacts that may result from its construction, operation and decommissioning.

Environmental performance during operation would be demonstrated by implementing the operational measures specified within an Operational Environmental Management Plan (OEMP). If granted development consent, the Project would also be subject to independent environmental audits during operation. These audits must be conducted in line with the Department's *Independent Audit Post Approval Requirements* (2018) and are intended to ensure compliance with consent conditions, verify environmental performance, and provide transparency in ongoing project delivery. The independent auditor must be suitably qualified, with relevant experience in environmental auditing, be independent of Ausgrid and any associated contractors or consultants, and be approved by DPHI, following a formal selection and acceptance process outlined in the Independent Audit Methodology. This process is expected to suitably manage environmental compliance throughout operation.

4.3.4.2 Potential hazards – combustion and fire risk

In total, 22 submissions expressed concerns around the safety risks posed by lithium-ion batteries, particularly in relation to fire hazards, toxic emissions, and long-term environmental impacts.

In relation to fire and explosion risk, submissions cited examples of containerised BESS fires in other jurisdictions that burned uncontrollably for extended periods, raising fears of similar incidents near homes, schools, and major transport routes like the M4 Western Motorway. Concerns were expressed about the potential for thermal runaway events, flashovers, and the inability to extinguish lithium-ion battery fires with water. Questions were raised about the performance and safety of lithium-ion batteries during extreme Australian summer heat, with fears of increased fire and explosion risks.

Several submissions highlighted the potential for toxic emissions and health hazards, including the release of hazardous substances during fires, such as fluorinated gases, heavy metals (e.g. cobalt,

nickel), and "forever chemicals" such as polyfluoroalkyl Substance (PFAS). These were described as posing irreversible risks to human health, wildlife, and surrounding soil and waterways.

Submissions noted that BESS infrastructure becomes hazardous e-waste after their operational lifespan and questioned the adequacy of long-term waste strategies.

Several submissions opposed the use of lithium-ion technology specifically, suggesting alternative battery chemistries and requesting independent oversight and fire safety assessments.

Response

The Project's PHA (Appendix L of the EIS) was developed in accordance with *Hazardous Industry Planning Advisory Paper No. 6 – Preliminary Hazard Analysis* (HIPAP No.6). The preliminary risk screening in the PHA concluded that the Project is not considered a 'potentially hazardous industry' in accordance with the *Hazardous and Offensive Development Application Guidelines – Applying SEPP 33* (NSW Department of Planning, 2011).

The PHA assessed all feasible types of hazards that may arise during construction and operation of the Project, including the risk of a fire with the LiFePO₄ batteries, environmental pollution from a spill of oil or other pollutants, as well as other risks associated with electricity and standard construction related hazards. The PHA identified that the onsite and offsite risk profile of these events to be rated as either 'as low as reasonably practicable' (ALARP) or better ('Acceptable'). The PHA concluded that the Project can be managed in accordance with the established risk criteria in accordance with ALARP principles. That is, that the Project can be operated in a manner that does not pose unacceptable risks to the community.

A PHA Addendum (**Appendix H**) was subsequently prepared to assess the updated Project layout, including an increase in separation distance between the battery units and a reduced clearance distance between the battery units and the site boundary (16 m to approximately 12 m). The PHA Addendum identified that the heat radiation associated with a fire at the Project is not likely to be significant. The heat radiation levels would be below the injury risk criteria specified in HIPAP No.4 and well below the level of heat radiation which could cause discomfort for people at nearby properties. These findings are consistent with the PHA prepared for the original EIS.

BESS in Australia must comply with national and state safety installation and operational standards, including *AS/NZS 5139:2019 Electrical Installations – Safety of battery systems for use with power conversion equipment*. These standards are designed to reduce the risk of incidents such as fire, explosion, or chemical exposure. The Project's design will comply with these standards and ensure that the fire safety system is adequate to meet the extent of potential fires, effectively minimising the potential for propagation and escalation.

Prior to energisation of the batteries, a Fire Safety Study (FSS) will be prepared in accordance with the requirements of HIPAP No.2 and *Fire Safety Guideline Technical Information: Large scale external lithium-ion battery energy storage systems – Fire safety study considerations* (FRNSW, 2023). The FSS will be prepared in consultation with FRNSW, which will provide independent oversight in relation to the fire safety of the Project's design and operation.

An EP and ESIP will also be prepared. The implementation of these plans will help ensure fire risks are recognised, and relevant management strategies are applied throughout the Project's construction and operation.

In relation to potential toxic impacts and associated health hazards, the PHA (Appendix L in the EIS) identified that it is unlikely that toxic combustion products would pose a significant hazard for people outside of the site boundary. Smoke plumes generated by a fire (containing most of the combustion products) are likely to be carried up to an altitude where they would be dispersed to below hazardous levels, without harm to people in the vicinity.

The battery units will not become hazardous e-waste after the Project has been decommissioned. As identified in **Section 4.3.2.1**, at the end of a battery's life it will be recycled at an approved recycling facility (where it will dismantled and recycled) or returned to the manufacturer for refurbishment/remanufacturing, and reintegrated into the battery manufacturing process where feasible.

4.3.4.3 Potential hazards – emergency response

Several submissions raised concerns about the Project's preparedness for fire-related emergencies. Questions were asked about whether local emergency services are adequately trained and equipped to respond to incidents such as battery fires, including the possibility of multi-day fires or chemical spills. One submission noted that a BESS fire would require hazmat-trained crews and evacuation logistics that do not currently exist in the area.

There was also a query about the and whether there is a plan to evacuate nearby residents quickly in case of a battery fire or explosion. Some submissions sought clarity on how the community would be protected, particularly if a fire were to occur overnight.

One submission questioned the availability of a defibrillator onsite in the event of electrocution.

Other submissions questioned whether an independent risk assessment has been conducted to address worst-case scenarios, such as earthquakes, floods, or other severe weather events. There were also queries about what specific plans have been put in place to manage these risks and ensure the safety of the community and environment in the face of potential climate-related hazards.

Response

To respond to fire events, Ausgrid would prepare an EP and ESIP for the Project, as outlined in **Section 4.1.5**. The EP and ESIP will ensure that in the unlikely event of an incident, suitable emergency procedures are in place. Residents will be advised to follow the guidance of emergency services. The EP and the ESIP will:

- Outline procedures for staff and occupants to follow during various emergencies
- Provide first responders with detailed, up-to-date information about the site layout, fire safety systems, hazardous materials, and key building services
- Support rapid, informed decision-making by emergency services, improving the safety of both responders and the community
- Ensure compliance with regulatory requirements, such as the Work Health and Safety Regulation and relevant planning guidelines
- Facilitate coordinated and effective emergency response, including evacuation, containment, and hazard management.

To respond to flood events, a Flood Emergency Response Plan (FERP) would be prepared prior to the commencement of construction. This would form part of the CEMP and would document how the risks to life and property within the site would be safely managed during flood events.

The Project's exposure to existing environmental risks including earthquakes was considered as part of the PHA (Appendix L of the EIS). The assessment determined a low risk of earthquakes occurring at the site and the risk was therefore screened out of the PHA. The BESS has been designed, and will be constructed, in accordance with all relevant Australian standards and guidelines, including those relating to structural integrity and seismic risk.

All work on the Project will be conducted in accordance with recognised major Codes of Practice and will utilise Job Safety Analysis, Safe Work Method Statements, permits to work and isolation, control of modifications, and inspection and audit regimes to ensure the safety of all Project personnel. There is currently no specific requirement in NSW legislation or fire safety guidelines that mandates a defibrillator (AED) to be installed at a BESS, and therefore the provision of an AED is not included in the Project.

4.3.4.4 Chemical waste

Eight community submissions objected to the use of hazardous construction materials such as lead, lithium, and cobalt in the manufacture of the BESS. One submission suggested the need to find alternatives to the chemicals and heavy metals embedded in renewable energy components for the energy transition to progress.

Several community submissions commented on the risk of soil and water contamination affecting the surrounding area, resulting from the seepage and runoff of these hazardous materials, and questioned how this would be mitigated.

One submission suggested that the Project is not consistent with the Australian drinking water guidelines.

Response

If the Project is approved, the CEMP and OEMP developed for the Project would include measures and controls to manage any potentially hazardous liquid material and/or dangerous goods on site and to avoid or mitigate any contamination risks, with the following key documents forming part of these plans:

- A construction Soil and Water Management Plan including an Erosion and Sediment Control Plan
- A construction Acid Sulfate Soil Management Plan (ASSMP)
- A Waste Management Plan (included within the CEMP)
- A FERP documenting how the risks to life and property within the construction footprint would be safely managed during construction in the event of a flood
- An OEMP, including procedures to appropriately handle hazardous materials such that they remain safely contained within the site. Specified responses to a pollution incident will also be documented.

The implementation of the above documents would minimise soil and water contamination risk to the surrounding area. It should also be noted that the Project will be comprised of LiFePO₄ battery units, which do not contain cobalt.

Potable water would be supplied via bottled water or through the existing potable water supply within the Mason Park STSS. Any potable water storage within the site will be managed and maintained in accordance with the Australian Drinking Water Guidelines (National Health and Medical Research Council, 2011), as noted in mitigation measure SWGF-5 in the EIS.

4.3.4.5 Traffic and transport

Concerns were expressed about increased local traffic and air emissions from construction and maintenance vehicles associated with the BESS.

Several submissions noted existing traffic congestion near major routes such as the A3 (Homebush Bay Drive) and the M4 Western Motorway, and suggested construction activities might exacerbate delays and road safety issues.

One submission highlighted the potential for road closures, including the M4 Western Motorway, M4 tunnel, Homebush Bay Drive, Parramatta Road, and nearby train lines, in the event of a fire or hazardous incident at the site, resulting in transport impacts.

Response

The Traffic Impact Assessment prepared for the Project (Appendix J in the EIS) identified that the construction vehicle volumes associated with the Project would result in minor construction traffic impacts along construction access routes. The additional vehicles associated with construction are not expected to significantly impact the local road network. An additional four traffic movements per week are expected during operation of the Project, which is considered negligible. No significant cumulative traffic impacts are expected.

A CPTMP would be prepared as part of the Project's CEMP, in consultation with TfNSW, Transurban and Strathfield Council, and implemented prior to the commencement of construction. The CPTMP would provide further information on road transport volumes, distribution and vehicle types; the origin, destination and routes for construction and workforce vehicles, primary haulage routes highlighting critical locations, and traffic management controls to manage vehicle movements.

An EP and an ESIP will be developed for the site in accordance with the *Hazardous Industry Planning Advisory Paper No.1: Emergency Planning Guideline* (HIPAP No.1) and *FRNSW fire safety guideline – Emergency services information package and tactical fire plans*, respectively, and will be implemented in the event of a battery fire at the site. The Project's CEMP and OEMP will also include detailed

emergency response procedures in accordance with relevant regulation and policy, to manage the safety and protection of personnel, the public and the environment during an emergency incident.

4.3.4.6 Biodiversity and ecologically sustainable development

Five submissions raised concerns about the potential long-term ecological impacts of the Project, particularly in relation to urban biodiversity and sensitive ecosystems.

Concerns were expressed that the Project could cause a decline in local urban ecology, especially in surrounding waterways, such as Saleyards Creek, Powells Creek and Homebush Bay. Submissions highlighted the risk of chemical runoff or pollution affecting nearby creeks and ecological zones, with potential consequences for aquatic life and broader ecosystems.

One submission questioned the adequacy of the ecological assessment, commenting that the impact on Homebush Bay area hadn't been fully addressed.

Another concern was raised in a submission about how local wildlife would be safeguarded from the effects of the Project in a residential setting.

One submission argued that the Project contradicts the principles of ecologically sustainable development (ESD).

Response

The concerns raised regarding the potential long-term ecological impacts of the Project are acknowledged and have been carefully considered throughout the planning and assessment processes.

The Project's design has been informed by a detailed ecological assessment that has sought to identify, avoid, minimise and offset potential impacts on biodiversity. This is documented in the Project's Biodiversity Development Assessment Report (BDAR) (Appendix E of the EIS). The BDAR identified that the urban landscape surrounding the Project has little connectivity to nearby waterways, such as Powells Creek, Haslams Creek or Homebush Bay (Badu Mangroves Wetlands).

The Project is located in a highly urbanised area, with major roads acting as significant barriers to fauna movement. Larger existing vegetated areas to the north of the Project are fragmented and lack direct connectivity. Small patches of nearby urban vegetation cover provide marginal habitat for highly mobile species, such as birds or insects, but are insufficient for sustaining most terrestrial fauna.

The BDAR identified that the majority of biodiversity impacts would occur during construction, specifically related to the clearing of vegetation. To minimise the loss of urban canopy cover, Ausgrid will further refine the Project Area required for construction and minimise tree removal where possible. Based on the need for infrastructure fire safety and asset protection zones, replacement planting at a ratio of 2:1 to offset losses and support long-term canopy restoration may be sought in an alternative location, subject to consultation with Strathfield Council.

Ecosystem credits will be required for the Project to offset any unavoidable impacts associated with clearing native vegetation. A total of six ecosystem credits would be required to offset the Project's residual biodiversity impacts. These would be sought and retired prior to the commencement of construction.

The Project's consistency with the principles of an ESD is outlined in Section 7.4 of the EIS. The Project is committed to upholding ESD principles by integrating environmental, social, and economic considerations into decision-making and design. This includes minimising environmental harm, promoting resource efficiency, and ensuring that biodiversity values are protected for current and future generations.

4.3.4.7 Agriculture

Public submissions noted that the Project, and other renewable energy projects, take up productive agricultural land which will lead to a cumulative decline in food and fibre production.

One submission highlighted serious risks to agricultural land and livestock from toxic contamination linked to BESS projects, including the leaching of chemical and heavy metals into water resources, and called for stronger protections such as food chain protection plans to safeguard crops, livestock, and long-term food security. Another submission expressed concern that BESSs located on rural farmland threatens food production.

Response

The Project is located within land zoned as 'SP2 Infrastructure (Electricity Supply)' under the Strathfield LEP, which is specifically designated for utility infrastructure and not for agricultural use. The Project does not occupy farmland and will not contribute to a decline in food or fibre production in the region.

Concerns regarding potential contamination of agricultural land and livestock are acknowledged, are not relevant to this Project or location. In addition, BESS are designed and regulated to meet strict environmental and safety standards, as outlined in the sections above. The technology used is enclosed, with robust containment systems to prevent leakage of chemicals or heavy metals in the event of an incident. Ongoing monitoring and compliance with planning requirements will seek to manage any future risks to surrounding land and ecosystems.

Given the urban context of the site and its land use zoning, the Project poses no threat to agricultural productivity or food security.

4.3.5 Social and economic impacts

4.3.5.1 Amenity impacts

One submission raised concerns about the visual prominence of the proposed Project, particularly its proximity to the DFO Homebush car park and rooftop areas, noting that the Project is considered substantial in scale and highly visible, with limited landscaping or screening measures proposed to mitigate its impact. The submission states that the current design and mitigation strategies, such as a 1 metre garden bed, are inadequate and may negatively affect the shopper experience. The submission suggests alternative screening solutions to better integrate the infrastructure into the surrounding environment and reduce its visual impact.

One submission expressed concerns around noise and light pollution disrupting residents' sleep and asked what mitigation measures had been put in place.

Response

The noise barrier configuration has been altered in the updated Project layout. The revised noise barrier is now 2.5 m higher and circumnavigates most of the BESS, rather than being positioned through the centre of the rows of containerised battery units.

Urban design features are proposed on the noise barrier along the northern boundary to provide improved visual amenity from publicly accessible areas within DFO Homebush, based on feedback in its submission. The finish of the noise barrier is proposed to comprise an aluminium Colorbond® façade, panel and post arrangement with colours and textures to be confirmed during detailed design. An example of the proposed noise barrier is depicted in Figures 1 and 2 of the Visual Impact Assessment Memorandum in **Appendix G**.

The visual presence of the noise barrier will be softened on the northern boundary through the use of vegetation buffers or artistic mural work to reduce industrial aesthetics. Ausgrid will consider artistic mural on the noise barrier in consultation with Strathfield Council, DFO Homebush and First Nations stakeholders.

The feasibility of perimeter planting will be considered in conjunction with infrastructure fire safety requirements and asset protection zones. Where perimeter planting is considered to be feasible, a Landscape Plan will be developed prior to construction detailing planting areas between the noise barrier and the perimeter security fence.

In accordance with mitigation measure VA-8, lighting will be designed and installed in accordance with AS4228-1197 – *Control of Obtrusive Effects of Outdoor Lighting* to minimise glare and light spillage.

The installation of permanent noise barriers around the BESS and reduced fan duty cycle speeds within the battery units will ensure compliance with operational noise limits at residential receptors during operation of the Project.

4.3.5.2 Impact on property values

Two submissions expressed concern that the Project may negatively affect property values in the surrounding area, with one submission highlighting the potentially exacerbating financial pressure this could have on young families already navigating a challenging economic climate.

Response

The Project is not expected to have any measurable impact on property values in the surrounding Homebush area. Evidence from similar projects indicates that well-managed energy infrastructure, particularly when located within industrial or mixed-use zones, does not negatively affect residential property values. Furthermore, the Project includes mitigation measures to manage amenity impacts and ensure compatibility with the surrounding environment, thereby reducing the potential for adverse property value impacts. The BESS will contribute to energy reliability and resilience, which will provide a long-term benefit to the community, including local property owners.

4.3.5.3 Insurance and compensation

One submission queried whether residents could expect any compensation or protections if the BESS causes damage to their homes or health. Another submission raised concerns around neighbours experiencing higher insurance premiums and an inability to insure due to increased risks associated with the proximity of the Project.

Response

BESS operators are typically required to hold comprehensive insurance policies. These policies generally include public liability coverage, which can provide compensation for third-party property damage or personal injury should an incident occur. If such an event were to cause damage to nearby properties or adversely affects residents' health, affected parties may be eligible to seek compensation through these policies.

The concern regarding potential increases in insurance premiums and challenges in obtaining insurance for neighbouring properties due to the proximity of the BESS is acknowledged. Insurance premiums are determined by individual insurers based on a range of factors, including property characteristics, location, and perceived risk. While proximity to a BESS may be considered by some insurers, there is currently no evidence to suggest that the presence of a BESS results in higher premiums or renders properties uninsurable.

The Project has been designed and will be operated in accordance with all relevant safety standards, including Australian Standards and guidelines for fire safety, electrical safety, and hazardous materials management. Risk assessments undertaken as part of the planning process have considered potential fire and safety risks, and mitigation measures have been incorporated to ensure that risks to surrounding properties are minimised to acceptable levels.

Furthermore, BESSs are becoming increasingly common across Australia and there is no widespread indication that their presence has led to systemic insurance issues for neighbouring properties.

Ausgrid remains committed to ongoing engagement with the community and will continue to provide transparent information regarding safety and risk management. Should residents experience specific insurance-related issues, they are encouraged to raise these with their insurers directly, and Ausgrid will provide relevant project documentation to support such discussions, if required.

4.3.5.4 Job availability

One submission recognised that the Project has the potential to create new local jobs during construction, maintenance, and operation, and attract investment to the local area. Another submission queried the percentage of jobs going to the local community and how will this be guaranteed.

Response

The Project would generate up to 100 jobs during the peak construction period and a further five part time roles during operation and maintenance, which will provide local and/or regional economic benefits. Whilst Ausgrid will seek to preferentially employ local people for the construction of the Project, this cannot be guaranteed as the construction will be the responsibility of a contractor, who will have their own existing staff and employment priorities.

4.3.5.5 Costs

In total, 14 submissions commented on the increase in cost to electricity as a result of the Project, and costs associated with the construction, operation and decommissioning of the Project. These submissions generally disagree that the Project will provide affordable energy supply suggesting that the Project will only increase electricity costs and unreliable electricity supply.

Response

The Project's key economic benefit lies in storing surplus electricity during low-demand periods when electricity prices are lower and releasing this later during periods of higher demand. This reduces the need for more costly peaking power resources at certain times of the day and as such is likely to reduce wholesale electricity prices (not increase), benefiting households and businesses alike.

In addition to potential reductions to wholesale electricity prices, the Social and Economic Impact Assessment prepared as part of the EIS (Appendix M) determined that the construction of the Project would also provide economic benefits. An annual output contribution of \$7.7 million into the NSW economy and \$2.8 million into the Eastern and Central Districts of the Greater Sydney Region is expected as a result of operation of the Project. Total output growth over the Project's 50 year operational life would equate to \$385.7 million for the NSW economy and over \$142 million for the region.

4.3.6 Beyond the scope of the Project

4.3.6.1 National security and cybersecurity risks

Some submissions were outside the scope of the Project, as defined in the EIS, and have not been addressed further in this Submissions Report. These submissions included broader concerns about the BESS including criticism of its ownership structure, and national security concerns, particularly regarding the use of components manufactured overseas that may pose cybersecurity risks.

5.0 Updated Project justification

This Submissions Report addresses the requirement to consider and respond to all submissions received during the exhibition of the EIS. It also provides minor clarifications/additions to the assessment of the Project. An updated Project description has been provided in **Section 1.4**, building on the Project description provided in the EIS and accounting for refinements to the Project and other clarifications presented in this Submissions Report.

The EIS and this Submissions Report have concluded that the Project should proceed, as it complies with all relevant environmental and planning requirements and would provide environmental, social and economic benefits to the Greater Sydney region and to NSW more broadly. Overall, the Project delivers:

- Alignment with Commonwealth, state and local policies, strategies and statutory requirements
- Additional energy storage capacity to support the increase in renewable energy generation across the NEM, directly addressing projected shortfalls arising from the retirement of coal fired power generation
- Improved network stability and resilience
- Job creation and investment for the Greater Sydney region and NSW more broadly
- Meets the objects of the EP&A Act.

During construction, the Project's environmental performance and compliance with relevant policy and conditions of consent would be managed through the implementation of the CEMP and its associated sub-plans. The CEMP would implement the mitigation measures outlined in the EIS, including additional measures presented in this Submissions Report.

Environmental performance and compliance during operation would be managed through the implementation of the OEMP and its associated sub-plans.

Noting the mitigation and management measures proposed, the benefits of the Project are deemed to outweigh the potential adverse impacts. Given the Project's alignment with numerous strategic plans and guidelines, it is considered to be in the public interest.

Based on the findings detailed within the EIS and this Submissions Report, the Project is considered to be justified and is recommended to proceed, subject to appropriate conditions of consent.

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Appendix A

Submissions Register

Appendix A Submissions Register

Submitter type	Name	Location	Where addressed in Submissions Report
Stakeholder group	Save Our Surroundings Murrumbidgee	Griffith, NSW	Section 4.3.2.1 Section 4.3.2.2 Section 4.3.4.2
Stakeholder group	Save Our Surroundings	Gulgong, NSW	Section 4.3.2.2 Section 4.3.5.5
Stakeholder group	Save Our Surroundings Hay	Hay, NSW	Section 4.3.2.1 Section 4.3.4.4
Stakeholder group	Vicinity Centres – DFO Homebush	Homebush, NSW	Section 4.3.5.1
Stakeholder group	Save Our Surroundings Riverina	Lake Albert, NSW	Section 4.3.2.1 Section 4.3.2.2 Section 4.3.4.2
Stakeholder group	Save Our Surroundings Lancefield	Lancefield, Victoria	Section 4.3.1.3 Section 4.3.2.2 Section 4.3.2.3 Section 4.3.4.2
Stakeholder group	Save Our Surroundings Moulamein	Moulamein, NSW	Section 4.3.4.2 Section 4.3.4.3
Stakeholder group	The Energy Realists of Australia	Neutral Bay, NSW	Section 4.3.2.1 Section 4.3.2.2 Section 4.3.2.3 Section 4.3.4.7 Section 4.3.5.5 Section 4.3.6.1
Stakeholder group	Save Our Surroundings Redbank Plains	Redbank Plains, Queensland	Section 4.3.4.2 Section 4.3.4.6 Section 4.3.5.5
Stakeholder group	Save Our Surroundings Swan Hill	Swan Hill, Victoria	Section 4.3.2.2 Section 4.3.4.2 Section 4.3.4.3
Public	Tim Chan	Homebush, NSW	Section 4.3.2.2 Section 4.3.5.4 Section 4.3.5.5
Public	Margaret Armstrong	Gulgong, NSW	Section 4.3.2.2 Section 4.3.5.5 Section 4.3.2.3
Public	Ian McDonald	Walcha, NSW	Section 4.3.1.3 Section 4.3.2.2 Section 4.3.4.4 Section 4.3.4.7 Section 4.3.5.5
Public	Withheld	Griffith, NSW	Section 4.3.2.3 Section 4.3.4.2
Public	Withheld	Westmead, NSW	Section 4.3.2.1 Section 4.3.4.2 Section 4.3.4.4 Section 4.3.4.5 Section 4.3.4.6
Public	Withheld	Gulgong, NSW	Section 4.3.1.2 Section 4.3.1.3 Section 4.3.2.2

Submitter type	Name	Location	Where addressed in Submissions Report
			Section 4.3.2.3 Section 4.3.4.1 Section 4.3.4.2 Section 4.3.4.5 Section 4.3.5.5 Section 4.3.6.1
Public	Withheld	Waverton, NSW	Section 4.3.2.1 Section 4.3.4.2
Public	Withheld	Homebush West, NSW	Section 4.3.4.2 Section 4.3.4.5 Section 4.3.5.4
Public	Withheld	Koorringal, NSW	Section 4.3.2.1 Section 4.3.4.2
Public	Withheld	Harefield, NSW	Section 4.3.2.2 Section 4.3.5.5
Public	Withheld	Kepnock, Queensland	Section 4.3.2.3 Section 4.3.4.2
Public	Withheld	Springfield, NSW	Section 4.3.2.3 Section 4.3.6.1
Public	Withheld	Hay, NSW	Section 4.3.1.2 Section 4.3.1.3 Section 4.3.4.1 Section 4.3.4.2 Section 4.3.5.5
Public	Withheld	Hay, NSW	Section 4.3.5.5
Public	Withheld	Springfield, Queensland	Section 4.3.2.2 Section 4.3.4.2 Section 4.3.5.5
Public	Withheld	Redbank Plains, Queensland	Section 4.3.2.2 Section 4.3.2.3 Section 4.3.4.2
Public	Withheld	Barham, NSW	Section 4.3.3 Section 4.3.5.1
Public	Withheld	Lancefield, Victoria	Section 4.3.1.3 Section 4.3.2.2 Section 4.3.5.5
Public	Withheld	Horsham, Victoria	Section 4.3.1.3 Section 4.3.2.2
Public	Withheld	Moulamein, NSW	Section 4.3.4.3
Public	Withheld	Gannawarra, Victoria	Section 4.3.1.1 Section 4.3.1.3
Public	Withheld	Torque, Victoria	Section 4.3.4.3
Public	Withheld	Moulamein, NSW	Section 4.3.1.1 Section 4.3.4.3
Public	Withheld	Barham, NSW	Section 4.3.3
Public	Withheld	Barham, NSW	Section 4.3.1.3
Public	Withheld	Gannawarra, Victoria	Section 4.3.2.3
Public	Withheld	Romsey, Victoria	Section 4.3.4.6
Public	Withheld	Swan Hill, Victoria	Section 4.3.4.5
Public	Withheld	Romsey, Victoria	Section 4.3.1.3
Public	Withheld	Moulamein, NSW	Section 4.3.2.3
Public	Withheld	Moulamein, NSW	Section 4.3.2.2 Section 4.3.4.3

Submitter type	Name	Location	Where addressed in Submissions Report
Public	Withheld	Swan Hill, Victoria	Section 4.3.2.1
Public	Withheld	Moulamein, NSW	Section 4.3.2.2
Public	Withheld	Moulamein, NSW	Section 4.3.2.2 Section 4.3.5.5
Public	Withheld	Moulamein, NSW	Section 4.3.3
Public	Withheld	Moulamein, NSW	Section 4.3.5.3
Public	Withheld	Swan Hill, Victoria	Section 4.3.4.1
Public	Withheld	Barham, NSW	Section 4.3.3 Section 4.3.4.2
Public	Withheld	Moulamein, NSW	Section 4.3.2.2
Public	Withheld	Gannawarra, Victoria	Section 4.3.3 Section 4.3.4.2
Public	Withheld	Barham, NSW	Section 4.3.3
Public	Withheld	Moulamein, NSW	Section 4.3.3
Public	Withheld	Barham, NSW	Section 4.3.4.2 Section 4.3.4.4
Public	Withheld	Swan Hill, Victoria	Section 4.3.4.2
Public	Withheld	Swan Hill, Victoria	Section 4.3.4.6
Public	Withheld	Kurnell, NSW	Section 4.3.3 Section 4.3.4.1 Section 4.3.5.2
Public	Withheld	Guyra, NSW	Section 4.3.2.2 Section 4.3.4.4 Section 4.3.5.5 Section 4.3.6.1
Public	Withheld	Cunninyeuk, NSW	Section 4.3.4.2 Section 4.3.4.4 Section 4.3.5.5
Public	Withheld	Swan Hill, Victoria	Section 4.3.3 Section 4.3.5.2
Public	Withheld	Moulamein, NSW	Section 4.3.4.3
Public	Withheld	Lake Albert, NSW	Section 4.3.2.2 Section 4.3.2.3 Section 4.3.4.2 Section 4.3.4.4 Section 4.3.4.6 Section 4.3.5.5

Appendix B

Updated Mitigation and Management Measures

Appendix B Updated Mitigation and Management Measures

Where additions have been made to the mitigation measures in light of the submissions received, they are shown in **bold**.

ID	Mitigation/management measure	Timing
Biodiversity		
B-1	Light coloured roof surfaces will be incorporated into the detailed design to limit the increase of local temperatures and subsequent effects on adjacent vegetation and fauna, where practicable.	Detailed design Construction Operation
B-2	The following measures will be included and implemented as part of the CEMP: • Protocols to monitor the vegetation condition and habitat values of any retained vegetation within the site • Plans showing areas to be cleared and areas to be protected, including exclusion zones and revegetation areas, where applicable • Protocols for pre-clearance inspections by a suitably qualified ecologist • Protocols for a suitably qualified ecologist or licensed handler to manage and handle unexpected or injured fauna Biosecurity measures including hygiene protocols, material inspections, and weeds monitoring programs and controls to minimise the potential spread of pests and pathogens.	Pre-construction Construction
B-3	To minimise loss of urban canopy cover, trees will be retained within the site where possible. A Tree Replacement Strategy will be included in the Project's Landscape Plan. Replacement tree planting will be at a ratio of 2:1 to offset losses and support long-term canopy restoration.	Pre-construction Construction Operation
B-4	All workers will receive an environmental induction to ensure awareness of ecological values and the protection measures to be implemented during the Project.	Pre-construction Construction
B-5	Physical barriers and markers will be installed to fence off or mark trees or other vegetation to be retained. Appropriate buffers around protected these trees will be established to avoid structural root zones.	Pre-construction Construction
B-6	Stockpiles will be restricted to designated areas in existing cleared areas to limit soil disturbance, the spread of weeds and clearing of vegetation.	Construction
Aboriginal heritage		
AH-1	An unexpected Aboriginal Heritage Finds Procedure and an onsite induction will be included in the Project's CEMP and be developed in consultation with the RAPs. The procedure will cover all Aboriginal objects (as defined by NPW Act), including human skeletal remains.	Pre-construction
AH-2	The Project's standard environmental site induction will include an Aboriginal heritage component outlining current protocols and responsibilities with respect to the management of Aboriginal cultural heritage within the Project Area (including the unexpected finds protocol) and provide an overview of the diagnostic features of potential Aboriginal sites and objects.	Construction

ID	Mitigation/management measure	Timing
AH-3	Should unanticipated Aboriginal archaeological material be encountered during construction of the Project, all work will cease in the vicinity of the find and an archaeologist contacted to assess the find and advise on the course of action to be taken. Further archaeological assessment and Aboriginal community consultation will be undertaken, if required, prior to the recommencement of works. Any objects confirmed to be Aboriginal in origin must be reported to Heritage NSW.	Construction
AH-4	In the unlikely event that human remains are encountered during construction, all works will cease, and Heritage NSW and the police notified. Further assessment will be undertaken to determine if the remains were Aboriginal or non-Aboriginal.	Construction
Land use, soils and contamination		
LSC-1	A supplementary contamination assessment will be undertaken by a suitably experienced environmental consultant to address the data gaps within the Project Area, including an assessment of land contamination and acid sulfate soils risks.	Pre-construction
LSC-2	If unacceptable contamination risks are identified and/or the extent of ASS are inadequately understood, or data gaps remain following completion of the supplementary contamination assessment, a remedial action plan (RAP) will be prepared by a suitably experienced environmental consultant to address the identified unacceptable health exposure risks. Any RAP required will include a methodology for: - addressing data gaps requiring a further assessment (if required) - delineation of identified land contamination risks (if required) - validation of management/remedial works (if required).	Pre-construction
LSC-3	A construction Soil and Water Management Plan (SWMP), including an Erosion and Sediment Control Plan (ESCP) will be prepared in accordance with <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) (the "Blue Book"). These will be prepared by a Certified Practitioner of Erosion and Sediment Control (CPESC) or an accredited soil scientist and implemented during construction. The SWMP will include erosion and sediment control measures to progressively stabilise and rehabilitate disturbed areas throughout construction. The ESCP will include a protocol for erosion control inspections to detect and mitigate impacts during construction.	Construction
LSC-4	An Acid Sulfate Soils Management Plan (ASSMP) will be prepared in accordance with the Acid Sulfate Soils Manual (NSW Environment and Heritage, 1998) to outline management and treatment methodologies to be implemented during soil disturbance works within the Project Area, to adequately manage identified ASS risks during construction.	Pre-construction Construction
LSC-5	If evidence of contamination is uncovered during construction, the following measures will be undertaken: - cessation of ground disturbance at the location and within the immediate vicinity - assessment of the site contamination and determination of appropriate remedial action.	Construction

ID	Mitigation/management measure	Timing
LSC-6	The Project's Construction Environmental Management Plan (CEMP) will include detailed Emergency Response Procedures in accordance with relevant regulation and policy, to ensure the safety and protection of personnel, the public and the environment. Emergency Response Procedures will also be included in an Operation Environmental Management Plan (OEMP) to be implemented during operation.	Construction Operation
LSC-7	Hazardous materials such as chemicals, fuels and oils will be handled and stored in accordance with relevant Australia Standards and the <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i> (DECC, 2007).	Construction Operation
LSC-8	Diesel will be stored on an impermeable surface in a bunded area (sized to contain 110% of the volume of the diesel stored) where a potential leak or spill would be contained and not enter the Project's stormwater management system.	Construction Operation
LSC-9	Transformers would be designed in accordance with the relevant Australian Standards that requires transformers to be located on impermeable surfaces with secondary containment. The secondary containment will consist of impermeable bunding with the capacity to contain 110% of the volume of oil within the transformer.	Detailed design Construction
LSC-10	Spill kits appropriate to products used on site will be readily available and stored in all vehicles onsite. As far as practicable, any spills of hazardous materials occurring onsite will be rendered safe (unable to contaminate further) by construction staff as soon as possible after the event, and the site environmental representative informed immediately. Emergency Response Procedures will be implemented, where required.	Construction Operation
Visual amenity		
VA-1	The removal of existing vegetation including trees that provide screening along the site boundaries will be minimised where possible.	Detailed design
VA-2	Non-reflective surface treatments will be applied to buildings and structures where practical to minimise reflection.	Detailed design
VA-3	The 'industrial' aesthetic of the Project will be reduced through the colour and/or finish of the noise walls. The noise walls will be coloured in mid-green, if possible, to recede the appearance of structures by blending them with vegetation. Where noise walls are public facing, artistic murals with positive messaging will be considered, where practical.	Detailed design
VA-4	A landscape plan will be developed prior to construction and include details of vegetation removal, planting areas and a planting list, which will be implemented during construction.	Pre-construction Construction
VA-5	The area of disturbance during construction will be limited where practical.	Construction
VA-6	Stockpiles, storage areas and construction equipment will be located in areas not visible to public viewpoints, where practical.	Construction
VA-7	All areas disturbed by construction and not required for operation of the Project will be rehabilitated.	Detailed design Construction
VA-8	Lighting will be designed and installed in accordance with AS4228-1197 – <i>Control of Obtrusive Effects of Outdoor Lighting</i> to minimise glare and light spillage.	Detailed design Operation

ID	Mitigation/management measure	Timing
Noise and vibration		
NV-1	Further noise modelling will be conducted based on the detailed design of the Project to confirm noise predictions, potential impacts and associated mitigation measures.	Detailed design
NV-2	A Construction Noise and Vibration Management Plan (CNVMP) would be prepared as part of the CEMP. The CNVMP will identify: • Potential significant noise and vibration generating activities associated with the activity • Noise and vibration sensitive receptors • Measures to be implemented during construction to minimise noise and vibration impacts, such as restrictions on working hours, site inductions and toolbox talks, and best practice noise and vibration controls for minimising noise • An Out of Hours Work procedure • Noise and vibration monitoring procedures Arrangements for consultation with affected neighbours and sensitive receptors, including notification and complaint handling procedures.	Pre-construction Construction
NV-3	All sensitive receptors likely to be affected by Project construction noise would be notified at least five days prior to commencement of works. The notification will include details of: • The nature of the construction work • Construction period and construction hours • Contact information for Project staff, both onsite and offsite Complaint and incident reporting and how to obtain further information.	Construction
NV-4	Construction will generally be carried out during the standard daytime working hours (as defined in the ICNG). Works generating high noise and/or vibration levels will be scheduled during less sensitive time periods.	Construction
NV-5	High noise generating work (>75 dB(A) LAeq at receptor) carried out during standard construction hours will be in continuous blocks of no more than three hours with a minimum respite period of at least one hour between each block, where the location of the work is likely to impact the same receptor.	Construction
NV-6	For deliveries to and from the Project Area: • Loading and unloading of materials/deliveries will occur in designated loading or unloading points. Where this is not feasible, loading and unloading will take place in areas away from sensitive receptors, as far as practicable • Construction work areas near sensitive receptors will be designed to minimise the need to reverse vehicles (and hence trigger reversing alarms).	Construction
NV-7	Non-tonal reversing beepers (or an equivalent mechanisms) will be fitted and used on all construction vehicles and mobile plant regularly used onsite.	Construction
NV-8	Permanent noise barriers will be installed around the Project to achieve compliance with the Project's operational noise trigger levels. These barriers will comply with the minimum dimensions outlined in the Noise and Vibration Impact Assessment (Appendix I).	Operation
NV-9	During commissioning of the Project, operational noise compliance monitoring will be conducted in proximity to the BESS equipment and the receptors closest to the Project, to validate that its initial	Operation

ID	Mitigation/management measure	Timing
	operation achieves an acceptable acoustic outcome in accordance with the Project trigger levels.	
NV-10	The approach for managing operational noise in accordance with the Project trigger levels, including operational noise compliance monitoring, will be set out in an Operational Noise Management Plan.	Operation
Traffic and transport		
T-1	Prior to the issue of any construction certificate, a Construction Pedestrian and Traffic Management Plan (CPTMP) will be prepared in accordance with the <i>Australian Standard 1742.3</i> and the <i>Work Health and Safety regulation 2017</i>. The CPTMP would include, but not limited to, provide further information on the following: • A description of the development • Location of any proposed work zone(s) • Details of crane arrangements including location of any crane(s) and crane movement plan • Proposed construction hours • Construction program and construction methodology, including any construction staging • A map of the primary haulage routes highlighting critical locations • Construction vehicle access arrangements • Road transport volumes, distribution and vehicle types broken down into: - Hours and days of construction - Schedules for phasing/staging of the Project. • The origin, destination and routes for: - Employee and contractor light vehicles - Heavy vehicle traffic - OSOM vehicles • Demonstration that proposed construction vehicle movements can work within the context of road changes in the surrounding area • Measures to ensure any proposed shuttle bus program to transport construction workers to/from the site can be practically achieved • Road maintenance contributions • A consultation strategy for liaison with surrounding stakeholders • A complaints resolution and disciplinary procedure • Local climatic conditions that may impact road safety throughout all project phases (e.g. fog, wet and significant dry, dusty weather), and appropriate driving responses • Traffic management controls to manage vehicle movements when B-doubles are scheduled to enter the site • Plans demonstrating how all vehicles awaiting loading, unloading, or servicing can be accommodated on the site to avoid queuing in the street network • Detailed plans of the site access and proposed layout of the internal road and pedestrian network and parking on site in accordance with the relevant Australian Standards and Council's DCP • Components of a Plan of Management (PoM)	Pre-construction Construction

ID	Mitigation/management measure	Timing
	- Onsite mitigation measures targeted at safety and reducing the impact of onsite transport including: - Onsite speed restrictions - Appropriate dust suppression measures - Maintenance program for on-site access tracks to ensure safe access - Loading/unloading and material storage restrictions - Driver code of conduct. The CPTMP will be prepared in consultation with Transport for NSW, Transurban and Strathfield Council. A copy of the final plan will be submitted to Transport for NSW and Strathfield Council for endorsement.	
T-2	Pre-condition and post-condition surveys of the Access Road will be undertaken by the appointed contractor in consultation with Council. The Access Road will be monitored and maintained to ensure its continued safe use. Any faults attributable to construction of the Project will be rectified.	Pre-construction Post-construction
T-3	B-double and Class 1 permits will be obtained from the roads authority where required, prior to the commencement of journeys.	Prior to use of the routes
T-4	All Project OSOM vehicle movements will be scheduled to avoid other OSOM vehicles within the surrounding area as far as practicable. Scheduling will be undertaken as part of the permit application.	Pre-construction Construction
T-5	Load limits on all bridges and structures along the proposed routes will be reviewed as part of the permit process for OSOM vehicles.	Pre-construction
T-6	Formal approval will be sought from the rail authority for any railway crossings on the proposed OSOM vehicle routes.	Pre-construction
T-7	Neighbouring properties will be consulted and notified regarding the timing of major deliveries, which may require additional traffic control and potentially disrupt access.	Pre-construction Construction
T-8	Specific warning signs advertising changes to traffic conditions will be implemented if deemed necessary on the construction access routes.	Construction
T-9	A Decommissioning Traffic Management Plan would be prepared prior to the decommissioning phase, in conjunction with the relevant roads authorities to ensure adequate road safety and road network operations are maintained.	Decommissioning
T-10	A Plan of Management (PoM) and risk assessment for the Construction, Operation and Decommissioning phases shall be undertaken by the Applicant. The Applicant in preparing the PoM shall demonstrate to the Planning Secretary that WestConnex/Transurban have been engaged in the preparation of the PoM and are satisfied with the PoM. The PoM shall ensure that deliveries are organised outside of transport peak periods and any other management strategies to ensure that road safety and efficient transport operations is maintained. The PoM shall outline the process to ensure deliveries by heavy vehicles are coordinated and managed effectively so that two delivery vehicles do not arrive at the same time or delivery vehicles and/or do not arrive when a B-double is exiting the Access Road/waiting at the intersection to turn out (which would be beyond manned traffic control)	Construction Operation Decommissioning

ID	Mitigation/management measure	Timing
Surface water, groundwater and flooding		
SWGF-1	Detailed design will consider the management of stormwater quantity and quality, informed by water quality modelling, to ensure that the Project's stormwater drainage infrastructure manages floodwater appropriately and the requirements in the Strathfield Council Development Control Plan are met.	Detailed design
SWGF-2	A water quality treatment train will be included in the detailed design and implemented during construction to address the changes in pollutant loads generated by the increased impervious area within the Project Area. The stormwater treatment train will be appropriately sized to manage the four exceedances per year design storm.	Detailed design Construction
SWGF-3	Prior to construction, a Flood Emergency Response Plan (FERP) would be prepared. This would form part of the CEMP and would document how the risks to life and property within the Construction Footprint would be safely managed during construction. The FERP would be implemented during the construction period.	Pre-construction Construction
SWGF-4	A construction Soil and Water Management Plan (SWMP), including an Erosion and Sediment Control Plan (ESCP) will be prepared in accordance with <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004). These will be prepared by a Certified Practitioner of Erosion and Sediment Control (CPESC) or an accredited soil scientist and implemented during construction. The ESCP will include a protocol for erosion control inspections to detect and mitigate impacts during construction.	Construction
SWGF-5	Potable water storages will be managed and maintained in accordance with the <i>Australian Drinking Water Guidelines</i> (National Health and Medical Research Council, 2011).	Construction Operation
SWGF-6	Operational controls relevant to water will be included in a site-specific Operational Environment Management Plan (OEMP). The following measures will be included: - Procedures to maintain drainage features within the Project Area, including open channels, culverts, water quality controls and all pits and outlets. These will be maintained in accordance with the manufacturer's specifications and kept free-draining. - Procedures to appropriately manage the storage of hazardous materials within the Project's Operational Footprint, as well as protocols and controls to ensure that any major spills are managed and contained.	Operation
Hazards and risk		
HR-1	Project to be designed and operated to all relevant Australian Standards and to one or more of the major international BESS Codes, e.g. NFPA 855.	Detailed design
HR-2	The Project will be certified under internationally recognised test methods such as the Underwriters Limited (UL) 9540A Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage System.	Detailed design
HR-3	Prior to energisation of the batteries , a Fire Safety Study (FSS) will be prepared in accordance with the requirements of the Hazardous Industry Planning Advisory Paper (HIPAP) No. 2 Fire Safety Study Guidelines (DoP, 2011) in consultation with and submitted to FRNSW and DPHI for review.	Pre-construction Prior to energisation

ID	Mitigation/management measure	Timing
	- The FSS is to be used to inform the design and as such it is FRNSW Position that the FSS be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ). - The FSS should be prepared consistent with the FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations.	
HR-4	The Preliminary Hazard Analysis prepared for the Project (provided in Appendix L) will be re-evaluated based on detailed design to ensure that aspects considered (i.e. control measures, clearances between containerised battery units, separation distances) and associated mitigation measures are still valid.	Detailed design
HR-5	The level of lightning protection required will be determined in accordance with AS/NZS 1768-2021 Lightning protection and implemented during construction.	Detailed design Construction
HR-6	Measures to prevent leaks and secondary containment of a spill, including at the transformers, will be considered in detailed design.	Detailed design
HR-7	The existing redundant wooden light poles in the Project Area will be removed prior to commencement of construction to avoid potential damage to containerised battery units and initiation of a thermal runaway and fire.	Pre-construction
HR-8	An Emergency Response Plan and a Pollution Incident Response Management Plan will be developed and implemented for the Project. The plans will establish evacuation protocols, appropriate response to gas and pressure release, bunding requirements for transformer oils, and protocols for major spills.	Detailed design Construction Operation
HR-9	Warning signs will be installed and maintained as per Code and Standards requirements, and will include signage for dangerous goods, electrical hazards, arc flash and entry procedures.	Detailed design Construction
HR-10	Installation and maintenance will be conducted by trained personnel, and induction of personnel will take place prior to work commencing.	Construction Operation
HR-11	Work will be conducted in accordance with recognised major Codes of Practice, including procedures, using Job Safety Analysis, Safe Work Method Statements, permits to work and isolation, control of modifications, inspection and audit regimes.	Construction
HR-12	Controls will be included in the CEMP/OEMP and implemented to manage any potentially hazardous liquid material and dangerous goods in accordance with Australian Standards requirements, including AS 1940 for flammable liquids control.	Construction Operation
HR-13	Preventative maintenance practices will be put in place, including maintenance schedules and calibration of equipment, instruments and sensors, asset protection zone, and vegetation management within the operational footprint, as required. Condition monitoring will be conducted.	Operation
HR-14	Only restricted personnel allowed onsite and only certified persons to open door and enter containerised battery units.	Operation
HR-15	Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1.	Pre-construction Construction

ID	Mitigation/management measure	Timing
HR-16	Prior to occupation or commissioning an Emergency Services Information Package (ESIP) is developed for the site in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.	Pre-construction Construction
Social and economic		
SE-1	Consultation will be carried out with Strathfield Council, local residents, and other key stakeholders to coordinate works to minimise impacts, manage cumulative impacts and enhance potential benefits.	Construction
SE-2	Future consultation will be undertaken that will focus on key stakeholder and community concerns and ensuring that misinformation is addressed when encountered. Communication channels and materials will be regularly updated and regularly monitored for stakeholder inquiries.	Construction
SE-3	Residents and local businesses will be notified in advance of any work that may affect amenity (e.g. traffic or noise disruptions), enabling them to plan accordingly. If work is conducted outside standard construction hours, residents will receive sufficient notice to minimise disruption.	Construction
SE-4	Translated versions of documents will be provided upon request to ensure inclusive engagement practices.	Construction Operation
SE-5	The Project will seek to employ a local workforce, where feasible, including prioritising local hiring, engaging employment agencies and tracking the number of local hires.	Construction
Non Aboriginal heritage		
NAH-1	A procedure will be included in the CEMP to guide the response to the discovery of any previously unknown items of heritage significance (being items of State heritage significance and/or local heritage significance) during construction. This will include guidelines on regulatory consultation, and physical management, include collection and salvage, as relevant.	Construction

ID	Mitigation/management measure	Timing
Waste		
W-1	A Waste Management Plan will be developed and implemented as part of the CEMP and would: - Identify requirements consistent with the waste hierarchy and circular economy initiatives - Include relevant measures from the <i>National Waste Policy: Less Waste, More Resources</i> (Department of Agriculture, Water and the Environment, 2018) - Provide a framework to target resource efficiency through the design and construction phases - Provide consistent clear direction on waste and resource handling, storage, stockpiling, use and reuse management measures - Set out processes for disposal, including onsite transfer, management, and the necessary associated approvals/permits - Describe the process for regularly removing waste from the Project Area to avoid issues associated with odour, visual amenity, and the attraction of animal/pest species - Outline procedures for waste generated to be segregated at source and suitably stored in designated waste management areas within the Project Area Include material tracking measures to track waste and recyclables generated from the Project and removed from the Project Area.	Construction Operation
W-2	Onsite waste management will include the appropriate separation and storage of waste streams to enable recycling and reuse wherever possible to reduce associated environmental impacts and impact to the capacity of local waste management facilities.	Construction
W-3	All waste will be assessed, classified, managed, and disposed of in accordance with the <i>Waste Classification Guidelines</i> (NSW EPA, 2014) and other relevant legislation.	Construction Operation Decommissioning
W-4	Hazardous waste (e.g. waste oil, paint, septic wastewater, asbestos, etc) will be collected by a licenced waste contractor for disposal at an appropriately licenced facility.	Construction Operation
W-5	All generated and regulated waste records will be retained for waste tracking purposes.	Construction
Air quality		
AQ-1	The CEMP will include air quality management measures to minimise visible dust moving offsite including: - Modification of working practices (location and scale of activities which generate dust emissions) during periods of adverse weather (hot, dry, and windy conditions) - Minimising exposed surfaces, such as stockpiles and cleared areas. Stockpiles will be partially covered, where practicable - Minimising the handling of spoil when excavating and loading vehicles - During dry weather, suppressing dust on stockpiles and unsealed or exposed area using methods such as water trucks/hoses, sprinklers, temporary stabilisation methods, soil binders or other appropriate practices - Burning of material onsite will be prohibited - Visual monitoring of air quality to verify the effectiveness of controls and enable early intervention	Construction

ID	Mitigation/management measure	Timing
	• Covering vehicles loads when transporting materials and equipment • Using wheel washes/shaker grids to minimise tracking of dirt offsite onto surrounding roads, as appropriate • Maintaining plant and equipment in good condition and in accordance with manufacturers' specifications • Minimising idling by turning off plant and machinery when not in use.	
Embodied carbon emissions		
EC-1	Reduction of embodied emissions by selecting lower-carbon materials such as concrete mixes with reduced Portland cement content and optimising steel design by selecting higher strength per mass steel components.	Design Construction

Appendix C

Updated Aboriginal Cultural Heritage Assessment Report

Appendix D

Noise and Vibration Assessment Memorandum

Appendix E

Traffic Impact Assessment Memorandum

Appendix F

Hydrology Assessment Memorandum

Appendix G

Visual Impact Assessment Memorandum

Appendix H

Preliminary Hazard Analysis Addendum