



RTS

SSD-68815961 – Jindera BESS

BESS Atlantic Pty Ltd c/o (GDA) Pty Ltd

10 Kings Road, New Lambton NSW 2305

Prepared by:

SLR Consulting Australia

SLR Project No.: 620.041088.00001

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1.0 Amended with ecology update	20 February 2026	Clare Brennock / Kale Langford	Clare Brennock	Clare Brennock
2.0 Amended with DPHI comments	16 July 2026	Kale Langford	Clare Brennock	Clare Brennock

Basis of Report

This report has been prepared by SLR Consulting Australia (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with BESS Atlantic Pty Ltd (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

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Acronyms and Abbreviations

AA	Archaeological Assessment
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACHMP	Aboriginal Cultural Heritage Management Plan
ADRM	Archaeological Research Design and Methodology
AEMO	Australia Energy Market Operators
AEP	Annual Exceedance Probability
AHD	Australian Height Datum
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
AGRDR	Austroroads Guides to Road Design
ANZIC	Australian and New Zealand Standard Industrial Classification
Applicant	BESS Atlantic Pty Ltd
APZ	Asset Protection Zone
ARDM	Archaeological Research Design and Methodology
AS	Australian Standard
BAL	Bushfire Attack Level
BAM	Biodiversity Assessment Method
BC Act	<i>Biodiversity Conservation Act 2016</i>
BDAR	Biodiversity Development Assessment Report
BESS	Battery Energy Storage System
BESS Atlantic	BESS Atlantic Pty Ltd
BESS site	Portion of Lot 204 DP 753342 at 204 Ortlipp Road, Glenellen NSW 2642
BMP	Bushfire Management Plan
BRAR	Bushfire Risk Assessment Report
BSAL	Biophysical Strategic Agricultural Land
BYDA	Before You Dig Australia
CEEC	Critically endangered ecological community
CEMP	Construction Environmental Management Plan
CIV	Capital Investment Value
CLM Act	Crown Land Management Act 2016
CNVMO	Construction Noise and Vibration Management Plan
Code of Practice	Code of Practice for Archaeological Investigation of Aboriginal Objects (NSW)
Council	Greater Hume Shire Council
DA	Development Application
DCCEEW	Commonwealth Department of Climate Change, Energy, Environment and Water



DP	Deposited Plan
DMP	Decommissioning Management Plan
DPHI	Department of Planning, Housing and Infrastructure
EDC	Estimated Development Cost
EEC	Endangered Ecological Community
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EOL	End of life
EPA	NSW Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
ESCP	<i>Erosion and Sediment Control Plan</i>
ESD	<i>Ecologically Sustainable Development</i>
FRIAR	<i>Flood Risk and Impact Assessment Report</i>
GDA	Gransolar Development Australia
GDE	Groundwater Dependent Ecosystems
GW	Gigawatt
ha	Hectares
HIA	Heritage Impact Assessment
HIPAP	Hazardous Industry Planning Advisory Board
HFRA	Hydrology and Flood Risk Assessment
HHA	Historic Heritage Assessment
HRA	Hazards and Risk Assessment
HV	Heavy Vehicles
IPA	Inner Protection Area
KFH	Key Fish Habitat
kg	Kilogram
km	Kilometres
kV	Kilovolt
kVA	Kilo volt-amperes
L	Litre
LALC	Local Aboriginal Land Council
LCVIA	Landscape Character and Visual Impact Assessment
LEP	Local Environmental Plan
LFB	Lachlan Fold Belt
LLS	Local Land Services
LGA	Local Government Area
LSC	Land and Soil Capability
LUCRA	Land Use Constraints Risk Assessment



LVIA	Landscape and Visual Impact Assessment
MLRA	Multi-Level Risk Assessment
MNES	Matters Of National Environmental Significance
m	Metres
mm	millimetres
MW	Megawatt
MWh	Megawatt Hours
NEM	National Electricity Market
NSW	New South Wales
NTA	<i>Native Title Act 1993</i>
OEH	Office of Environment and Heritage
PAD	Potential Archaeological Deposit
PCT	Plant Community Type
PMF	Probable Maximum Flood
Proponent	BESS Atlantic Pty Ltd
RAPs	Registered Aboriginal Party
REZ	Renewable Energy Zone
RL	Reduced Level
RFS	NSW Rural Fire Service
SEPP	State Environmental Planning Policy
SES	State Emergency Service
SHI	State Heritage Inventory
SLR	SLR Consulting Australia Pty Ltd
SSAL	State Significant Agricultural Land
SSD	State Significant Development
Substation Site	Lot 1 DP588720, No.140 Ortlipp Road, Jindera NSW 2642
SWMP	Soil and Water Management Pan
TEC	Threatened Ecological Community
TfNSW	Transport for New South Wales
TIA	Traffic Impact Assessment
TL	Transmission line
TMP	Traffic Management Plan
TS	Transmission Substation
VIC	Vicotria
VPA	Voluntary Planning Agreement
WMA	Water Management Act 2000
WMP	Waste Management Plan
WQIA	Water Quality Impact Assessment



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Appendix C	Updated BDAR
Appendix D	Updated ACHAR / AA
Appendix E	Biosis Report
Appendix F	Updated Preliminary Hazards Assessment
Appendix G	Updated Mitigation Measures Table



1.0 Introduction

The Jindera Battery Energy Storage System (BESS), 'the Project', involves the development, construction, operation, and eventual decommissioning of a BESS with a capacity of approximately 250 MW / 625 Megawatt Hours (MWh) connecting via overhead transmission lines (TL) to the existing JINDERA 330/132 kV TS, operated by Transgrid.

Jindera BESS will consist of BESS containers (or enclosures), with each container having dimensions of 6 metres (m) in length with an approximate weight of 35,000 kilograms (kg). The BESS will be supported by inverters from the BESS and connect to the existing Transgrid substation via approximately 500 m of 330 kV overhead lines.

The key elements of the Project include the following:

- Installation and operation of a BESS including approximately 200 battery enclosures, 100 inverters, and transformers on hardstand with subsurface wiring, and benching of the site to level the foundation for each component;
- Connection and associated upgrades to JINDERA 330/132 kV TS, including construction of overhead 330 kV TL to facilitate connection, associated high voltage steel poles, increase in hardstand area and establishment of easements;
- Associated ancillary infrastructure including security fencing, landscaping, site access and internal road (crushed rock), water tank, temporary parking;
- 4 m acoustic barrier along the north and west BESS units;
- Providing reticulated water to the BESS Site:
 - Extension of the council water main along a portion of Ortlipp Road;
 - Upgrade of existing water main along a portion of Lindner Road;
- Sealing of Ortlipp Road from the Glenellen Solar Farm to the site access;
- Tree / vegetation removal;
- Pad extension to the Transgrid substation; and
- Decommissioning of the BESS at the end of life (EOL).

The application (SSD-68815961) has completed the public exhibition period which ran from Wednesday 20 August 2025 until Wednesday 17 September 2025. As per Section 59(2) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), this Response to Submissions (RTS) report provides a response to the Department of Planning Infrastructure and Housing (DPHI) on the items raised from both government and private agencies, and members of the public.

The RTS report provides the following supporting plans and reports:

- Appendix A Submissions Register
- Appendix B Amended Waste Management Plan
- Appendix C Amended BDAR
- Appendix D Amended ACHAR / AA
- Appendix E Biosis Report
- Appendix F Updated Preliminary Hazards Assessment



2.0 Summary and Analysis of Submissions

A total of 81 submissions were received with 67 from the public, and 14 from agencies, summarised in the section below.

2.1 Agency Submissions

Four agency submissions required a response or additional works, these are detailed in Table 1 - 5 in Section 2.1. Nine of the submissions did not require further action and provided a general comment or recommended conditions, these have been consolidated in Table 6.

The agency submissions received:

1. Greater Hume Council – (not referenced / dated)
2. Transport for NSW (TfNSW) – reference REN25/00154/001, dated 9 October 2025
3. Department of Planning, Housing and Infrastructure (DPHI) – Crown Lands and Public Spaces – reference 25/07992#10, dated 17 September 2025
4. Department of Planning, Housing and Infrastructure (DPHI) – Heritage NSW – reference HMS ID 11537, dated 19 August 2025
5. Department of Planning, Housing and Infrastructure (DPHI) Hazards – no reference / date
6. Department of Climate Change, Energy, the Environment and Water (DCCEEW) – reference OUT25/12062, dated 15 September 2025
7. Department of Primary Industries and Regional Development (DPIRD) – Agriculture and Land Use Planning – reference OUT25/12055, dated 13 September 2025
8. Department of Primary Industries and Regional Development – Aquatic Assessment, Regulation and Engagement – reference FE24/365, dated 12 September 2025
9. Department of Primary Industries and Regional Development (DPIRD) – NSW Resources – reference D25/85684, dated 15 September 2025
10. Water NSW – reference D2025/103219
11. Regional Delivery Division (RD) of NSW DCCEEW, reference DCO25/697967, dated 1 October 2025
12. Fire and Rescue NSW (FRNSW) – reference: D25/95278, 21 August 2025
13. Rural Fire Services (RFS) – reference: DA20240324001178-EIS, dated 1 October 2025
14. Transgrid – reference: 2024-151, (not dated)

DPHI did not issue a request for further information.

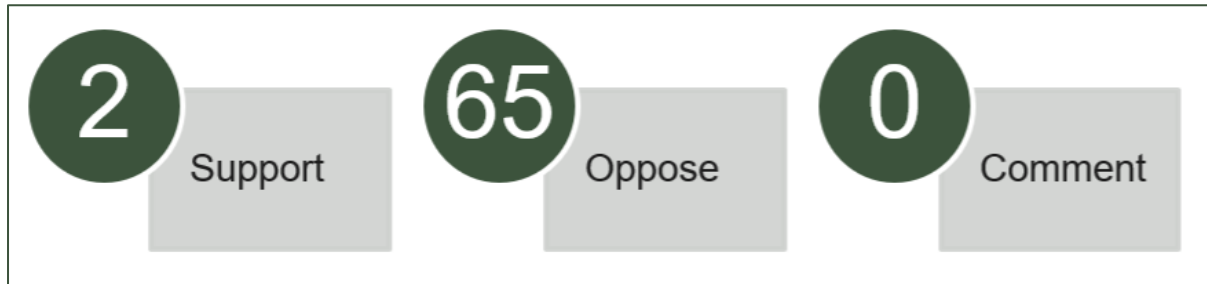
2.2 Public Submissions

Sixty-seven (67) public submissions were received during the exhibition period.

Of the 67 submissions received from the public 65 oppose the Project and 2 support with no unattributed submissions, refer to Figure 1.



Figure 1 Total Number of Submissions



Based on a review of the submissions received, the following provides the general characteristics of the submissions:

- 7 are from organisations;
- 2 are in support of the Project;
- No petitions were received; and
- 9 are considered generic objections without further comment on specific issues.

Figure 2 shows the location of the submissions based on the public information included. Of the 67 submissions received, 48 were in NSW and 19 were received from outside NSW, a breakdown is below:

- 48 submissions from NSW;
- 14 submissions from Victoria;
- 4 submissions from Queensland; and
- 1 submission from Tasmania.

40 submissions were received within a 300 km radius of the Subject Site, summarised below and shown in Figure 3.

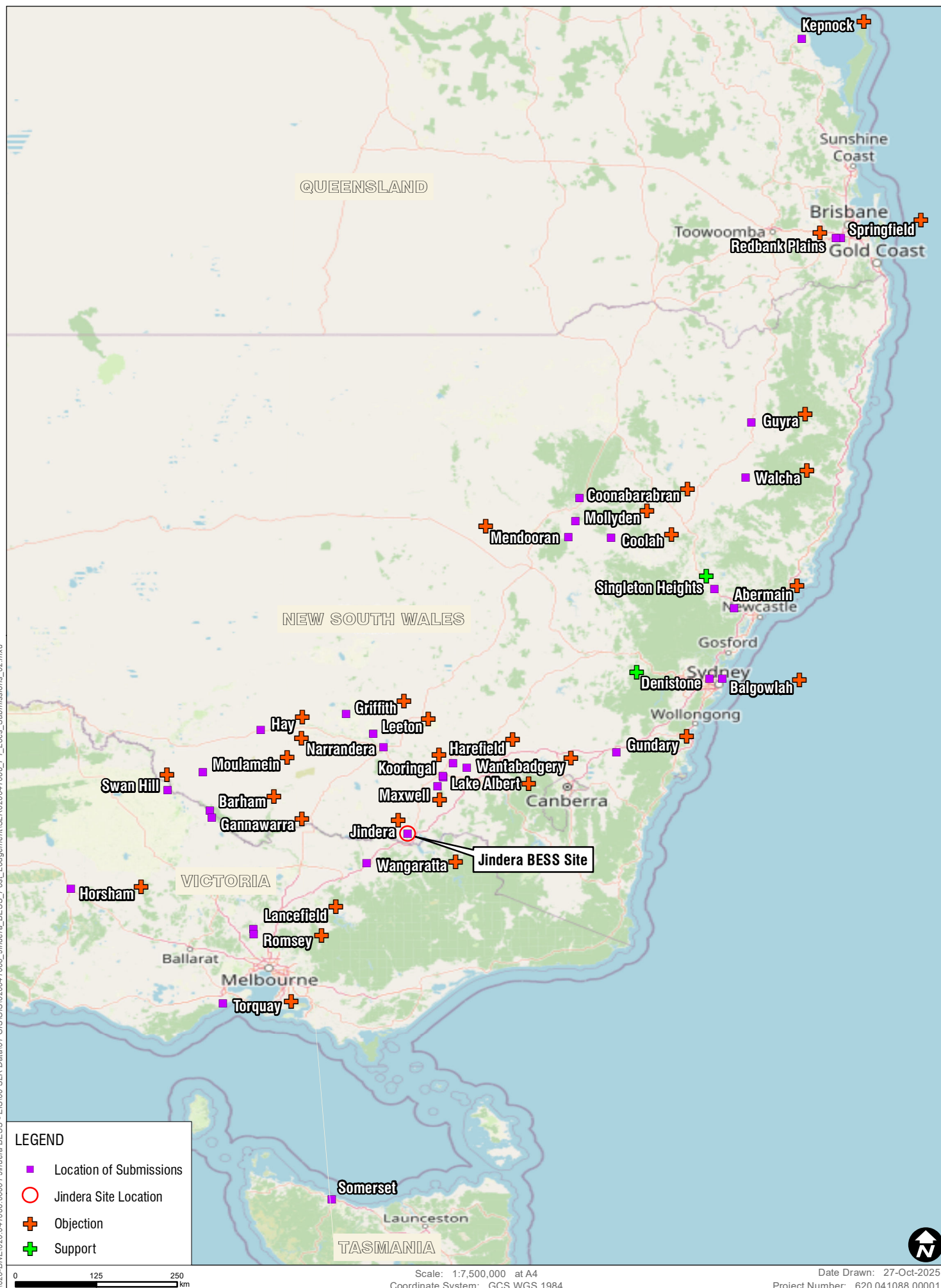
- 1 submission was from the suburb of Jindera;
- The next nearest submission was 1 from Wangaratta (VIC) approximately 69 km south west of the Subject Site;
- The next nearest submission was 1 from Maxwell (NSW) approximately 83 km to the north east of the Subject Site; and
- The township with the largest number of submissions was Moulamein (NSW) approximately 276 km to the north west of the Subject Site with 10 submissions.

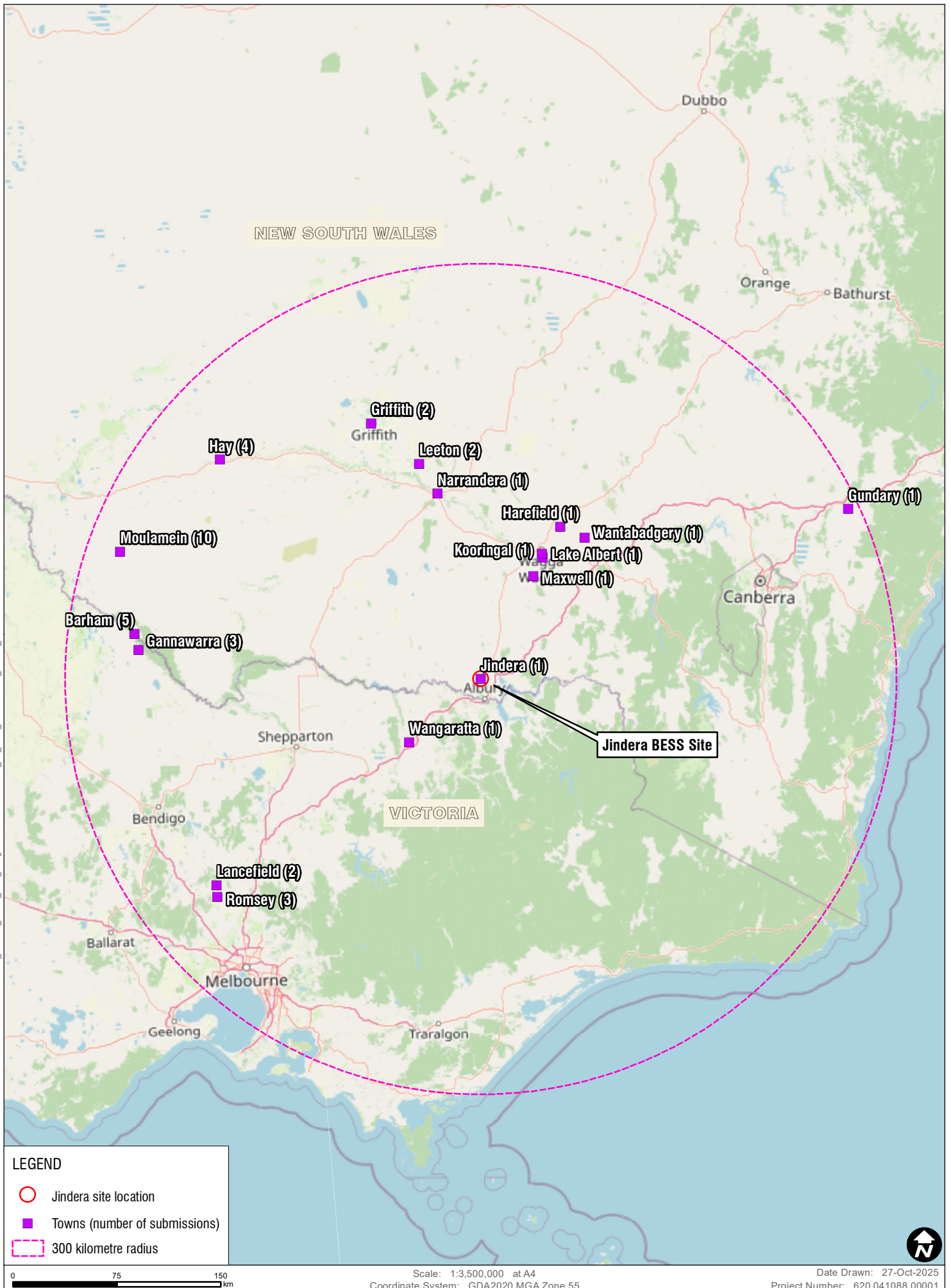
Submissions received were a mix of technical issues (fire risk, water contamination, land capability, decommissioning, policy process) and value-based objections (governance, national security, economics).

An analysis, summary and response to the concerns raised is provided in Table 7 of this RTS. The submissions have been categorised by concern and include the number of submissions relative to each issue. Consideration of the submission and any uploaded documents were considered as part of the analysis.

The matters raised in the submissions received from the public are addressed in Sections 4.2 of this RTS and a register of submissions is at Appendix A.







3.0 Actions Taken Since Exhibition

No physical design changes or operational details were required to be amended as a result of the submissions received.

The additional works undertaken include:

- Additional ecology survey and BDAR update; and
- Additional Aboriginal heritage works.

The additional works did not result in any required updates to the mitigation measures as submitted with the EIS.

These are detailed further in the sections below.

3.1 Additional Ecological Survey

Additional surveys have been undertaken since the submissions were received and include field surveys in October, November and December 2025. These have been detailed in the amended BDAR at Appendix C.

3.2 Additional Aboriginal Heritage Works

3.2.1 ACHAR Updates

Amendments have been made to the ACHAR and AA at Appendix D. The updates include revisions to the mapping and recommendations, with no additional surveys required. These updates are further detailed in Table 3. The updated ACHAR and AA were issued to the RAPs on Friday, 28 November, by Virtus Heritage.

3.2.2 Stage 1 Exploration / Testing Works

As recommended by Heritage NSW, the Proponent engaged Biosis Pty Ltd to undertake Stage 1 Exploration / Testing Works to clarify the presence and significance of Aboriginal cultural heritage within the Project area.

A test excavation program has been completed in the area identified by Virtus Heritage as having *moderate* potential archaeological deposit (PAD), associated with the isolated finding: AHIMS 55-6-0294J/Jindera IF1 (located outside the Development Footprint).

Three transects comprising 37 test pits were excavated. From these test pits one complete quartz flake was identified and recorded as AHIMS PENDING/Ortlipp Rd IF01. No additional areas of PAD were identified by the Registered Aboriginal Parties (RAPs) or Biosis during the investigations.

Based on the outcomes of the Stage 1 testing and noting that SSD approvals do not require an Aboriginal Heritage Impact Permit (AHIP) under the NPW Act (Section 4.41 of the EP&A Act), Biosis has recommended that an Aboriginal Cultural Heritage Management Plan (ACHMP) be prepared to appropriately manage Aboriginal cultural heritage impacts from the Project.

The ACHMP will be developed by a suitably qualified archaeologist or cultural heritage consultant, in consultation with the RAPs to ensure that management of heritage values throughout the Project's lifecycle are culturally appropriate and transparent.



3.3 Additional Transgrid Access

Separate to Transgrid's submission during exhibition, Transgrid have requested an additional access road to support construction works at the Jindera Substation. The access is on an existing unsealed track within the Project boundary and within the areas assessed for ecology and heritage under the original development footprint.

As the additional access is not a result of a formal submission and in discussion with DPHI this access has been addressed in an Amendment Report, separate to this RTS.

The modification is minor in nature, does not alter the Project footprint, and does not introduce any new or increased environmental impacts beyond those assessed in the EIS. Accordingly, no additional mitigation measures are required.

3.4 Capacity Clarification

An email was received from the DPHI on the 6 March 2026 requesting clarity regarding the proposed BESS specifications and total energy storage. The below aims to address the items raised in the email.

Due to the ever-changing battery landscape it has become necessary to clarify the proposed capability of the BESS development.

The maximum energy discharge capacity of the proposed development is 250MW. This is the rated output active power of the BESS, being the maximum active power output for which the system is designed to supply energy to the electric power network via the primary point of connection.

The maximum energy storage capacity of the proposed development is 625 MWh. This is the effective energy storage capacity at the beginning of service life for the assessed BESS design. This is the capacity adopted for the assessed hardware configuration, including allowance for losses, degradation and inaccessible storage, to maintain the intended Output Energy Storage Capacity.

The proposed development remains proposed as a 2-hour duration BESS with a rated output active power of 250MW and an intended Output Energy Storage Capacity of 500 MWh.

Further, the proponent confirms that the BESS design corresponding to the capacities above remains consistent with the design assessed in the EIS and PHA, including:

- A maximum of 200 individual BESS containers;
- 100 inverters;
- No increase in the maximum number of BESS units assessed; and
- A layout capable of being arranged consistently with the configuration assessed in the submitted EIS and PHA.

At the time the submitted design basis was established, the capacity adopted for each battery container was 3.125 MWh, based on the technology then available. A specific container had not been selected, but available products generally ranged from 3 MWh to 3.25 MWh per container. This formed the basis of the assessments and resulted in an assessed maximum of 200 battery containers and an effective energy storage capacity at the beginning of service life of 625 MWh.

The underlying assessments were based on the total installed hardware, being the assessed configuration corresponding to an effective energy storage capacity at the beginning of service life of 625 MWh. On that basis, the stated maximum energy storage capacity of 625



MWh does not require an increase in the maximum number of battery containers assessed and does not alter the maximum layout footprint assessed in the EIS and PHA.

This clarification is also included In the Amendment Report.



4.0 Response to Submissions

4.1 Agency Submissions

Section 4.1 provides a response to submissions received from government and private agencies, Table 6 in Section 4.1.6 provides a summary of the agency submissions received that had no further comment and / or recommended conditions.

4.1.1 Greater Hume Shire Council (Council)

In a letter received 28 October 2025, Greater Hume Shire Council (Council) provided comment on the Project, a response is provided in Table 1. An additional response was received from Council dated 24 November and is included in table 1.

Table 1 Council Items and Response

Key Issue	Response
Voluntary Planning Agreement (VPA): Council requests that the proponent enter into a Voluntary Planning Agreement with Greater Hume Council under which Council would receive \$150 per megawatt-hour of electricity generated, payable annually. This amount is to be indexed to the CPI for the project's operational life. The agreement must be finalised prior to the commencement of construction.	GDA are well commenced with the VPA and have provided a letter of offer to Council. Details have been provided to DPHI for comment.
Land Contamination: Council reviewed various documents provided in support of the application. Although the proponent has stated that the development site has not been identified as a contaminated site and that the proposed use will not significantly impact groundwater or similar resources—due to the battery units being self contained—Council remains concerned about the risk of land and waterway contamination in the event of battery damage, particularly due to fire. Therefore, Council requests the applicant amend the documentation to outline how such incidents would be managed, including details of the proposed clean-up procedures. Council also requests the Department include a condition requiring a Preliminary Site Investigation upon cessation of the proposal.	GDA accept the condition of a PSI as part of the decommissioning conditions.
Landscaping: Council suggests extending the landscaping and screening measures along Ortlipp Road and the northern boundary to mitigate the visual impact of the solar battery storage units and enhance the integration of the development into the surrounding environment.	The LVIA submitted with the EIS (Appendix K of EIS) identifies Viewpoint 1 as having an overall visual sensitivity of <i>low</i>. The proposed BESS will be effectively screened from this viewpoint by the approved noise wall and existing mature vegetation. The noise wall extends around the northernmost section of the BESS units, ensuring no other infrastructure will be visible from this location. Furthermore, several mature trees exist along the northeast boundary that will naturally screen



Key Issue	Response
	the noise wall, as well as mature trees within the sight distances of the Project from the south approach along Ortlipp Road, all these mature trees will remain. Due to the inclusion of the wall and associated drainage swale within the lease boundary, there is limited space for additional planting; however, further landscaping is not considered necessary given the low sensitivity rating and existing visual screening.
Infrastructure Requirements	
a) Road Infrastructure: <i>In consultation with Council, the proponent is required to undertake an independent dilapidation survey to assess Ortlipp Road and Lindner Road prior to the commencement of any construction, upgrade, or decommissioning works. Council also requires the proponent to upgrade (reconstruct and seal to Council standards) the gravel section of Ortlipp Road between the Glenellen Solar Farm driveway and the proposed Jindera BESS project driveway. Any driveway proposed must be constructed as an Industrial Type Property Access for the development.</i>	GDA accepts this as a condition of consent and the road upgrades are included as part of the EIS. These upgrades and driveway access will be detailed further during the construction certificate (CC) stage and to Council's specifications.
b) Water Supply: <i>A detailed water supply design must be submitted for approval prior to construction. Payment of a connection fee and the applicable Section 64 contribution equivalent to 6.94 Equivalent Tenements (ET) will also be required to be paid to Council prior to construction of the proposal.</i>	GDA accepts this as a condition of consent and the road upgrades are included as part of the EIS. The watermain is included in the EIS and will be detailed further at CC stage and to Council's specifications, including all required approvals outside of the SSDA approval.
c) Sewerage: <i>Table 9 within Appendix Q – "Waste Management Plan" lists several sewage treatment plants. Please note that, other than the Holbrook Sewage Treatment Plant, none of the listed plants have the capacity to accept additional sewage or domestic waste from the project. Council therefore recommends using Albury City's sewage treatment plant located at "Waterview". It is noted, however, that if the proponent chooses to use the Holbrook Sewage Treatment Plant, prior notification to Council will be required. Council advises that domestic waste can only be discharged at Holbrook between Monday and Friday, and that tanked liquid trade waste will not be accepted at the facility under any circumstances.</i>	During the notification period GDA have been in contact with wastewater service providers, including for their other site. A response from CWS Environmental Pty Ltd was received 27 October 2025: <i>CWS Environmental Pty Ltd can confirm that we would be able to accommodate wastewater collection and disposal services for the Finley BESS, Deniliquin East BESS, and Jindera BESS projects during both the construction and operational phases.</i> <i>Our company currently provides liquid waste management, port-a-loo servicing, and greywater disposal across the wider southern NSW region, including Deniliquin, Finley, and surrounds. We have the equipment and vehicles required to manage these types of waste streams in accordance with local EPA and council requirements.</i>



Key Issue	Response
	GDA will continue correspondence with CWS to confirm requirements and timeframes for Jindera.
d) Waste Management: Table 9 of Appendix Q – Waste Management Plan lists several waste facilities licensed to accept general solid waste. Council wishes to clarify that none of the facilities listed under “Greater Hume Council LGA” are actually located within Greater Hume Council’s boundaries; instead, they are situated within the adjacent Federation Council area. A review of the submitted Waste Management Plan outlines that it also relies on Council’s kerbside commercial collection for garbage collection. Please note that Council can only provide collection of general waste and recycling. Therefore, the proponent will be required to enter into an agreement with a licensed private waste contractor for the collection and disposal of green waste to Council’s Culcairn or Holbrook waste facilities.	It is acknowledged that in Section 3.9 and Table 7 of the Waste Management Plan that kerbside and Council collection is noted. This is an error and due to the minimal office type waste generated during operations it is expected that waste will be infrequent and will be taken by staff offsite for disposal. Waste generated by groundskeeping or battery replacements will be taken by the contractor. Kerbside and Council collection for the operations is not proposed. An amended WMP is provided at Appendix B of this response.
Additional request 26 November	
1. Road Infrastructure & Dilapidation Reporting: In consultation with Council, the proponent is required to undertake an independent dilapidation survey to assess the condition of both Ortlipp Road and Lindner Road prior to the commencement of any construction, upgrade, or decommissioning works. Council also requires the proponent to upgrade (reconstruct and seal to Council Standards) the full length of the road from the entrance of the Glenellen Solar farm to the intersection of Glenellen and Ortlipp Road. All road upgrades must comply with the Austroads Guide to Road Design, with a minimum sealed width of 7 metres and a pavement width of 9m with a design life of a minimum of 30 years to accommodate two-way traffic to the property boundary, in line with advice provided by Greater Hume Council’s Engineering Department. Any new driveway crossover from Ortlipp Road must be constructed as an ‘Industrial Type Property Access’ in accordance with the Austroads Guide to Road Design. The Applicant is required to obtain all necessary approvals from Council prior to commencing works. Upon completion of the road upgrades, the Applicant must notify Council to arrange a final inspection.	This request had not been discussed previously and includes approximately 1.6 km of additional road upgrades and sealing of Ortlipp Road. This portion of the road is not proposed to be used at any point during the expected 10-month construction program or during ongoing operations. This request is excessive and onerous in terms of the overall proposal and relatively short-term construction period, in addition to the submission being received over 2 months post exhibition closing. The Proponent requests that this is not conditioned and the sealing remains as originally proposed and discussed with Council and as per Council’s original submission (28 October).



4.1.2 Conservation Programs, Heritage and Regulation Group (CPHR)

In a letter received 1 October 2025, CPHR provided comment on the proposal. Table 2 provides the CPHR request and a response to the items raised.

Table 2 CPHR Items and Response

Key Issue	Response
Flood Management	
<i>The FRIAR hydraulic models must be updated with detailed designs.</i> ○ (1.1) Incorporate the detailed design of the project into the hydraulic model to accurately investigate the impact of the proposed project on the flood behaviour and update the FRIAR accordingly.	Correspondence via email (06/11/2025) with DPHI has confirmed this is a suggested post lodgement requirement.
<i>The FRIAR fails to demonstrate how emergency management matters have been discussed with Greater Hume Council and the NSW SES.</i> ○ (2.1) Actively engage council and SES to demonstrate emergency management matters have been adequately discussed and supported. ○ (2.2) Verify that a Flood Emergency Response plan is not required.	The FRIAR was sent to Council and SES prior to EIS lodgement and the responses are detailed in Table 25 of the EIS and an extract is provided below: Council: <i>The FRIRA was sent to Council for review as requested in the SEARs and Council advised on 6 May 2025 they did not have any further comments at that stage.</i> SES: <i>The FRIRA was sent to the SES for comment on the flood report. Correspondence was received April 1 2025 with general comments including:</i> - <i>Consideration of the Flood Risk Manual 2023 and associated;</i> - <i>Consideration of flood on broader road network to ensure people are able to evacuate the site;</i> - <i>Consideration of flood resilient infrastructure;</i> - <i>Seeking advice from DCCEEW regarding impact of development on surrounding area (to be done via referral); and</i> - <i>Incorporating flooding into a Business Emergency Plan.</i> The above items have been addressed in the FRIAR. Given the unmanned nature of the BESS facility, which is remotely monitored and only accessed periodically for maintenance, a detailed Flood Emergency Response Plan (FERP) is not considered necessary. Flood risk to personnel is negligible, and the site design ensures all critical infrastructure is located above the relevant flood planning level.



Key Issue	Response
	A Flood Contingency Procedure will be included in the Construction Environmental Management Plan (CEMP) to manage site access and safety during construction and maintenance in accordance with SES guidance. In addition submissions were received by Council and DCCEEW as a result of the formal exhibition period, Council's comments are provided in Table 1 of the RTS and did not include any further flood comments. DCCEEW is addressed in Table 6 of this RTS and did not include any further flood comments.
Biodiversity	
3.1 <i>Revise the BDAR to document how partially cleared areas will be managed to ensure vegetation is retained as per the VI score.</i> 3.2. <i>Revise the BDAR to assess all vegetation that will be completely removed as full loss. This should account for any areas or structural layers with potential to be inadvertently disturbed regardless of potential for rehabilitation.</i> 3.3. <i>Provide a protocol for partial loss that includes:</i> ○ <i>Application of partial loss using reasonable predicted final VI values which are consistent for each vegetation class and zone.</i> ○ <i>Evidence-based construction management measures to support assessed partial clearing outcomes.</i> ○ <i>Details on the clearing machinery, equipment and methods which will be used to achieve partial retention of biodiversity values.</i> ○ <i>Methods for handling of timber waste (logs, woodchip and leaf mulch) to avoid smothering retained vegetation.</i> 3.4. <i>Revise the spatial data to ensure the partial impact areas are distinguished from the full impact areas identified in the BDAR and BAM-C to ensure the spatial data can be used to accurately track impact management during construction.</i>	A revised BDAR is provided at Appendix C and has been updated to include all the items in the CPHR submission. Additional surveys have been undertaken, and full clearing has been applied, including the spatial data that has been updated.
4.1. <i>Provide additional justification for excluding Eastern Pygmy Possum and Little Eagle. Alternatively, complete additional surveys, use an expert report or assume presence.</i> 4.2. <i>Provide spatial data for the Superb Parrot species polygon with the revised BDAR.</i>	Additional surveys were undertaken: Eastern Pygmy-possum: 30- 31 October, 1 – 30 October & 1 – 17 December 2025 and remains as 'not present'. Little Eagle: 30 – 31 October 2025 and remains as 'not present'. Superb Parrot: 30 – 31 October & 25 – 27 November 2025 and remains as 'not present'.



Key Issue	Response
5.1. Justify how the species polygon for <i>Cullen parvum</i> was derived, in accordance with Section 5.2.5 of the BAM. Alternatively, amend the species polygon to include all potential habitat in the proposed partial clearing areas.	Additional survey was undertaken and the polygon has been amended, the species remains as 'not present'.
6.1. Revise the EPBC Act assessment for Box-Gum Woodland with consideration of the entire patch and the timing of floristic surveys. 6.2. Complete a significant impact assessment for each EPBC Act entity potentially impacted by the project.	The EPBC assessment has been amended in the BDAR, including <i>Appendix E – Matter of National Environmental Significance</i> .
7.1. Revise Section 10.1 of the BDAR to address the criteria in Section 9.1.1 of the BAM.	Section 10.1 has been updated to further detail the BAM criteria.
8.1. Revise Section 9.6 of the BDAR to include preparation of a Biodiversity Management Plan to ensure the mitigation measures can be implemented, monitored and reviewed. 8.2. Revise Section 9.3 and 9.6 of the BDAR to include the precautionary approach for connectivity impacts and consider all potentially impacted species and the consequences of the impacts. If mitigation measures are required to manage these impacts, provide the location of these on a map. 8.3. If specific mitigation measures are proposed for connectivity impacts and management of habitat features on site such as hollows and mulch, these need to be detailed, including how and when these would be implemented.	Section 9.3 and 9.6 have been revised, including additional Figure and updates to the mitigations tables and the inclusion of a preparation of a BMP.
9.1. The assessment must include all ancillary works such as widening of roads, access points and utilities to the site, and construction compounds, and the relevant spatial data must be provided.	All ancillary works are included in the BDAR assessment and spatial data provided.
10.1. Revise the BDAR to reflect the information in the most current BAM-C revision so that it indicates the correct offset obligation.	The BDAR and BAM-C has been revised.

4.1.3 Heritage NSW

In a letter received 19 August 2025, Heritage NSW provided comment on the proposal. Table 3 provides the CPHR request and a response to the items raised.

Table 3 Heritage NSW Items and Response

Key Issue	Response
Please update the Aboriginal Cultural Heritage Assessment Report (ACHAR) to include the following maps: As per requirement of the Code of Practice for Archaeological Investigation of Aboriginal Object in NSW (DECCW 2010;	The amended ACHAR and AA are provided at Appendix D, version 4, dated November 2025. These items have been updated in the AA: Figure 10 has been updated to include the mapping and track logs



Key Issue	Response
<i>Code of Practice), please provide detailed and thorough mapping which includes all survey track logs. Once track logs have been included, additional survey mapping may be required to clearly outline the extent of the survey within each survey unit.</i> ○ <i>An archaeological potential map depicting the conclusions noted in Section 5.</i>	- Figure 9 has been included to show the areas noted in Section 5.
<i>As per Requirement 23 of Code of Practice the recording of a site must be consistent with Aboriginal scarred trees in NSW, a field manual (DEC and Andrew Long 2005). As such, please ensure that a sketch of the tree and scar that includes the location and shape of scar, location of features (e.g. tool marks) , and overall condition of the tree and scar included in the site recording form.</i>	The site card has been updated to include all the noted information and is provided at Appendix G of the updated ACHAR (Appendix D of this RTS) AHIMS site ID: 55-6-2095, date recorded 29-10-2025.
<i>Heritage NSW recommends that all assessment should be undertaken prior to the approval of impacts to Aboriginal cultural heritage. Without adequate and complete assessment, in this case thorough survey of the project area and subsurface testing, to establish the cultural significance it cannot be demonstrated that more places of significance, or places which may further enhance the significance of the known Aboriginal cultural heritage in the area will not be found.</i>	Stage 1 archaeological test investigations have been undertaken during which one Aboriginal artefact was identified and recorded. Based on the results, Biosis recommend that an Aboriginal Cultural Heritage Management Plan (ACHMP) be developed to guide the appropriate management of heritage values during the Project. This recommendation remains consistent with mitigation measure ACH1 in Appendix E of the submitted EIS.
<i>It is recommended that the proposed program of archaeological test excavation of IF1 (AHIMS #55-6-0294) be undertaken in accordance with the Archaeological Research Design Methodology (ARDM) appended to the ACHAR prior to project approval to allow for adequate consideration and mitigation of any Aboriginal objects, sites and/or values.</i> <i>Test excavations to determine the nature of the subsurface archaeological materials and the potential extent of Potential Archaeological Deposit (PADs) will provide greater certainty on the areas that should be conserved and those locations that require additional management and mitigation prior to any approval for their impact.</i>	Refer to Appendix E for the Biosis Test Excavation Report.
<i>An arborist should be engaged to assess the condition of scarred tree ST1 (AHIMS#52-6-0295) prior to project approval, with the results of the arborist report included in an updated ACHAR for submission to Heritage NSW. This will allow for appropriate mitigation measures to be developed for the site once the condition of the tree is understood.</i>	The updated site card notes this tree is dead and in poor condition. Works associated with the Project, including watermain extension will avoid this area and not impact the tree.



Key Issue	Response
<i>Section 8 (Recommendations) should be updated to include a requirement for an Aboriginal Cultural Heritage Management Plan (ACHMP) to be developed in consultation with Heritage NSW and to the satisfaction of the Department of Planning, Housing and Infrastructure (DPHI).</i>	The ACHAR and AA have been updated to include this recommendation in Section 8, recommendation item 4. This recommendation remains consistent with mitigation measure ACH1 in Appendix E of the submitted EIS.

4.1.4 Department of Primary Industries and Regional Development (DPIRD) - Fisheries

In a letter received 12 September 2025, Department of Primary Industries and Regional Development (DPIRD) - Fisheries provided comment on the proposal. Table 4 provides the DPIRD Fisheries comments and a response to the items raised.

Table 4 DPIRD Fisheries Items and Response

Key Issue	Response
<i>DPIRD Fisheries notes that impacts to Kilnacroft Creek will be mitigated through the use of underboring for the water pipeline installation.</i>	This is correct, underboring is proposed and stated in the EIS, no further action required.
<i>Riparian buffers will be maintained around Kilnacroft Creek throughout construction and operation.</i>	This is correct, the buffer areas are noted in the EIS, no further action required.
<i>It is recommended that the proponent consult with DPIRD Fisheries regarding the retention and stockpiling of felled trees from the development footprint. These trees may be repurposed as large woody debris to enhance aquatic habitat quality within Key Fish Habitats in the region.</i>	GDA are willing to undertake this consultation and consider it can be managed post approvals.

4.1.5 Crown Lands

In a letter received 19 August 2025, Heritage NSW provided comment on the proposal. Table 5 provides the CPHR request and a response to the items raised.

Table 5 Crown Lands Items and Response

Key Issue	Response
<i>Lineal infrastructure (such as pipelines and/or electricity transmission lines) are expected to traverse Crown land, roads and/or waterways, an easement over said Crown land, roads and/or waterways will be required for protection of the infrastructure. To discuss easement requirements, please contact the Acquisitions team at the earliest opportunity at: cl.acquisitions@crowmland.nsw.gov.au.</i>	GDA have been in consultation with Crown Lands since the beginning of the Project and have continued correspondence during the EIS process. An extract of the latest correspondence from Crown Lands (email dated 13/10/2025): <i>Preliminary assessment has not identified any issues at this stage. However, we're unable to formally assess or approve the easement until Development Approval (DA) has been obtained and a copy of your proposed terms has been provided.</i>



Key Issue	Response
	In line with the advice received from Crown Lands, the Proponent will submit a formal easement application once the DA has been granted. The application will include the proposed terms and conditions and be consistent with Schedule 8 of the <i>Conveyancing Act 1919</i> (NSW) and applied alongside the relevant provisions of the <i>Crown Land Management Act 2016</i> (NSW).

4.1.6 Other Agency Submissions

Submissions from other NSW agencies were received, who provided no further comments, or suggested conditions of consent. These have been collated in Table 6



Table 6 Other Agency Submissions and Response

Agency	Comment	Recommended Condition	Response
TfNSW	<i>1. TfNSW traffic review and assessment The construction routes for light and heavy vehicles identified in the TIA prepared by SLR includes the Hume Highway and the Riverina Highway/Young Street intersection, for the identified routes from Wodonga. TfNSW advises that this portion of the state road network has existing higher order treatments and the SLR TIA traffic assessment confirms that existing intersection treatments and geometric road design will be able to accommodate the Jindera BESS without the requirement for further traffic mitigation measures or road upgrades. TfNSW review of the assumptions and intersections presented within the SLR TIA is aligned with the outcomes of the SLR TIA assessment. TfNSW advises no further traffic mitigation measures (physical or by enforceable measures) is required for the intersections with the state road network to be used by the projects construction traffic.</i>	None	None
TfNSW	<i>2. The high-risk OSOM route analysis prepared by ARES for Jindera BESS includes a portion of the route from the Victoria/NSW boarder on the state road network (Hume Highway and Riverina Highway). The high-risk OSOM route analysis identifies that the bridge assessments, transformer weights, rest areas and vehicle configurations will be completed post consent. TfNSW advises that the risk of addressing these matters post consent could lead to cost, scope increase and time delays to the project. However, if this risk is considered acceptable to DPHI and the proponent then.</i>	None	GDA are willing to accept the detailed route analysis as a condition of consent.



Agency	Comment	Recommended Condition	Response
	<i>While there is a risk to the projects timing and delivery for the high risk OSOM route analysis TfNSW consider the risk to the state road network assets a lower tiered risk given that the short segment of the state road network (Hume and Riverina Highway) have sufficient pavement widths, vertical and horizontal clearances that would accommodate the transformer high risk OSOM delivery.</i> <i>However, if this risk is considered acceptable to DPHI and the proponent then TfNSW advise that the outstanding high risk OSOM route analysis assessment matters could be addressed post consent in advance of high risk OSOM movement for the transformer being delivered to the site.</i>		
DPHI - Hazards	None	<i>1. The battery energy storage system associated with the development must not exceed a total delivery capacity of 250 MW and an energy storage capacity of 500 MWh.</i>	As outlined above the maximum energy storage capacity has been increased to 625 MWh and does not result in an increase in BESS units or development footprint. The installed cell capacity may exceed the usable capacity by up to 20% to account for degradation and system inefficiencies, ensuring that the Project retains a useable storage capacity of 625 MWh throughout the Project's operational life. GDA request of this is conditioned to be worded as follows: <i>The battery energy storage system associated with the development must not exceed a total operational delivery</i>



Agency	Comment	Recommended Condition	Response
			capacity of 250 MW and an energy useable storage capacity of 625 MWh. Jindera BESS will have a nominal capacity of 250 MW / 625 MWh, comprising a delivery capacity of 250 MW and an energy storage capacity of 625 MWh, representing the maximum capacity that may be charged from and discharged to the grid during operations. To maintain this operational capacity over the Project life, the BESS is designed to accommodate efficiency losses and natural degradation. The system therefore includes a 25 per cent oversizing allowance, resulting in an <i>Effective Energy Storage Capacity at the beginning of service life</i> of approximately 625 MWh. The PHA has been updated to reflect this increase and concludes there is no change to the hazards risk as originally assessed, refer to Appendix F.
DPHI - Hazards	None	2. At least one month prior to commencing construction of the battery storage system and associated footings/foundations, except for construction of those preliminary works that are outside the scope of hazard studies, or within such further period as the Planning Secretary may agree, the Applicant must prepare a Fire Safety Study for the	Standard condition, no further comment



Agency	Comment	Recommended Condition	Response
		development, to the satisfaction of Fire and Rescue NSW and the Planning Secretary. The Fire Safety Study must: 1. be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' and Fire and Rescue NSW's Fire Safety Guideline Technical Information - Large scale external lithium-ion battery energy storage systems - Fire safety study considerations; ○ describe the final design of the battery storage; ○ include reasonable worst-case bush fire scenario to and from the battery storage and the associated bush fire management; and ○ identify measures to eliminate the expansion of any fire incident including: - adequate fire safety systems and appropriate water supply; - separation and / or compartmentalisation of battery units; and - strategies and incident control measures specific to the battery storage design.	
DPHI - Hazards	None	3. Following approval by the Planning Secretary, the Applicant must implement the measures described in the Fire Safety Study. Note: "to the satisfaction of Fire and Rescue NSW" above means confirmation in writing from	As above, no further comment



Agency	Comment	Recommended Condition	Response
		<i>Fire and Rescue NSW that the Fire Safety Study meets the requirements of Fire and Rescue NSW as required by the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study'.</i>	
DPHI - Hazards	None	<i>3. The quantities of dangerous goods stored within the development and transported to or from the development must not exceed the threshold quantities listed in the Department's Applying SEPP 33 at all times</i>	Confirm
DPHI - Hazards	None	<i>4. The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:</i> <i>the requirements of all relevant Australian Standards; and</i> <i>the NSW EPA's Storing and Handling of Liquids: Environmental Protection - Participants Handbook if the chemicals are liquids.</i>	Standard condition, no further comment
	None	<i>5. In the event of an inconsistency between the requirements listed from (a) and (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</i>	Standard condition, no further comment
DPHI Agriculture	<i>The Department notes that the EIS has generally provided sufficient information for assessing and identifying adequate mitigation of agricultural impacts. It is noted that an Agricultural Impact Assessment and a Land Use Conflict Risk Assessment (LUCRA) have been completed as requested and that there are commitments for managing agricultural biosecurity, returning the</i>	None	None



Agency	Comment	Recommended Condition	Response
	<i>land to its "original state" following decommissioning, and rehabilitation following construction and decommissioning.</i>		
Fire and Rescue NSW		1. Prior to construction a Fire Safety Study (FSS) is developed in accordance with the requirements of the Hazardous Industry Planning Advisory Paper (HIPAP) No.22 and submitted to FRNSW for review. ○ The FSS is to be used to inform the design and as such it is FRNSW Position3 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.	Standard condition, no further comment
Fire and Rescue NSW		2. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.15.	Standard condition, no further comment
Fire and Rescue NSW		3. Prior to occupation or commissioning an Emergency Services Information Package (ESIP) is developed for the site in accordance with FRNSW fire safety guideline –	Standard condition, no further comment



Agency	Comment	Recommended Condition	Response
		<i>Emergency services information package and tactical fire plans.</i>	
RFS	<i>The Bush Fire Assessment Report Prepared by SLR Consulting Australia (SLR), (Ref No.: 620.041088.00015-R01-v1.0, dated 22 May 2025) has addressed the requirements of Planning for Bush Fire Protection 2019 and the items listed in our correspondence dated 9th April 2024.</i>	<i>The NSW Rural Fire Services raises no objections to the proposal progressing subject to adoption of recommendations of section 5 (and the associated mapping provided in Figures 13 - 15) of the above referenced report.</i>	Standard condition, no further comment
DCCEEW	None	None	None
NSW Resources	None	None	None
Water NSW	None	None	None
Transgrid	<i>The applicant has signed a Connection Process Agreement and scoping of the grid connection infrastructure is progressing under consultation with the customer.</i>	None	None



4.2 Public Submissions

An analysis and summary of the concerns raised with a response is provided in Table 7. The submissions have been grouped under *'the project, procedural matters, economic, environmental and social impacts, justification and evaluation of the project, and issues beyond the scope of the project'*, then further categorised by concern and include the number of submissions relative to each issue. Consideration of the submission and any uploaded documents were considered as part of the analysis.

Table 7 Public Submission Concerns and Response

Concern raised	Response
THE PROJECT	
Agricultural land & land capability – 18 Submissions	
Misclassification of land as Class 4 vs Espade Class 3	Based on input from DPIRD, the classification of the land is correct and undertaken in accordance with the relevant guidelines and requirements.
Compaction, altered hydrology, potential contamination undermining future productivity	A decommission plan will be required as part of any approval for the Project. The aim of the decommission plan will be return the Subject Site to viable agricultural use for the land owner.
Permanent soil compaction and loss of flexibility for future farming	Based on input from the DPRID, the proposed measures for decommission of the Subject Site is considered appropriate.
Decommissioning & financial assurance – 15 Submissions	
Absence/insufficiency of decommissioning/remediation plan	The proponent has committed to the preparation of a decommissioning plan as part of the Project and it is expected that this commitment will be reinforced as part of any future approval. It is also expected that the preparation of the decommission plan will be required prior to commencing operation.
Calls for a bond/financial security	While no formal bond or financial security is proposed by the Proponent, Greater Hume Shire Council requires a VPA to be established for Major Projects located in the LGA.
Risk of council/landholder liability (POEO Act references).	The agreement between the Proponent and Council will ensure Council's desired outcomes are achieved.
Amenity: noise, visual, lighting – 11 Submissions	
Continuous cooling/transformer	A Noise and Vibration Impact Assessment was provided with the EIS.
Night-time noise	It is proposed to implement a range of mitigation measures including silencing treatment of the BESS battery containers and inverters, and the installation of a 4 m noise wall on the northern and western boundary of the site. Installation of Heating, Ventilation, and Air Conditioning (HVAC) silencers, and inverters with silencing kits have also been recommended to ensure compliance.



Concern raised	Response
	With these elements implemented the noise meets the relevant noise criteria at all external residential dwellings within a 2 km radius of the site.
Visual industrialisation of rural landscape	A Landscape Character and Visual Impact Assessment was submitted with the EIS. Across all assessed viewpoints, the proposed developments are either minimally perceptible or suitably screened by vegetation and landscape form with the most noticeable change occurring in close-range views to the BESS location. Regardless of the minimal impact, the following mitigation measures are recommended: • Implementation of native vegetation screening along wall extent; • Use of muted finishes and non-reflective materials for battery enclosures; • Maintenance of existing vegetation and topographic buffers where possible; and • Placement of infrastructure to minimise visibility from key view corridors.
Light spill / dark sky impacts	Boundary lighting will be installed for security purposes. Security lighting will operate 24 hours 7 days a week. A Night Time Light Spill Assessment was provided with the EIS submission and was exhibited. Based on the assessment, the proposed lighting associated with the Project is not expected to result in light spill exceeding allowable thresholds at nearby sensitive receptors. While some lighting may be visible from surrounding properties, impacts are considered negligible due to distance, limited lighting intensity, and the presence of intervening vegetation and built features.
Property value effects	The proposed development location is adjoining an existing electrical substation operated by Transgrid. The co-location of these developments ensures impacts are consolidated in an existing location as part of a larger primary production area. Alongside the proposed mitigation measures, the visual impacts are considered to be low for the residential dwellings in the proximate area. Any impact on property value is considered to be negligible in this instance taking into account the location of the proposed development and the mitigations proposed.
PROCEDURAL MATTERS	
Policy/process & cumulative impacts – 16 Submissions	
Alleged project splitting within REZ	It is highlighted that the REZ area exists to enhance outcomes for renewable energy projects, particularly solar and wind, due to availability of solar and wind energy and support to establish transmission infrastructure for that energy generation. However, there is no requirement to locate renewable energy projects in these areas.



Concern raised	Response
	The Project has been located to leverage the proximity to both the existing substation and multiple solar farms in the Greater Hume LGA including the adjoining Jindera Solar Farm.
Call for holistic/REZ-wide assessment and a moratorium/inquiry	Petitioning your State or Commonwealth member of Parliament would be a more appropriate method for this item.
Distrust of guidelines and policy maturity for BESS	The Project is to be assessed in accordance with the State Significant Development Guidelines established for all Major Projects in NSW. Applicable guidelines govern assessment for particular environmental matters again applying to all relevant development applications. The Project application has considered a vast array of environmental matters as required by the Secretary of the Department of Planning, Housing and Infrastructure.
Heritage & social – 3 submissions	
Requests for Indigenous archaeological survey	An Aboriginal Cultural Heritage Assessment (ACHAR) was provided as part of the EIS and subsequently exhibited. Two previously unknown Aboriginal sites were identified and recorded during the surveys for the ACHAR however only one would be impacted by the development. The impacted Aboriginal site will undergo archaeological survey while the unimpacted site will be protected to ensure damage does not occur. Stage 1 archaeological test investigations have been undertaken by Biosis since exhibition. One Aboriginal artefact was identified and recorded. Management of this artefact will be incorporated in the ACHMP.
Stronger social impact consideration (community character/identity).	The submitted EIS was supported by community consultation which focused on the perceptions, concerns, and impacts on the local community. This community consultation was undertaken in accordance with the SEARs and the NSW DPHI <i>Social Impact Assessment Guideline for State Significant Project (2025)</i>. Further to this, the exhibition period lead by the DPHI ensures adequate consultation with the broader community, throughout NSW, and across Australia. It is highlighted that only one (1) submission was received from Jindera.
ECONOMIC, ENVIRONMENTAL AND SOCIAL	
Fire and Emergency Management – 21 Submissions	
Thermal runaway, re-ignition, toxic smoke	The proposed BESS units include internal safety mechanisms to immediately respond to fire. Each unit has internal fire-suppression systems designed and tested to comply with international and/or Australian standards and guidelines. Separation between the individual BESS units limit potential for fire to spread between the units. Automated fire detection and alerts, including constant remote monitoring ensure swift response by firefighters.



Concern raised	Response
Adequacy of firebreaks	The physical design of the Project incorporates separation between the proposed BESS and infrastructure, and an asset protection zone (APZ) between the Project and surrounds. These separations have been determined based on best practice, international and/or Australian standards and guidelines, and RFS requirements.
Water supply, response capability of local brigades	The potential fire risk has been firmly considered as part of the design. Three links are to be established and include: 1. Internal safety mechanisms 2. Physical measures 3. Response measures Internal Safety Mechanisms include: • In-built hazard reduction mechanisms to avoid the onset of a fire event; • Detect a fire and announce it to relevant stakeholders (i.e. Firefighters), and • Contain and suppress the fire until external firefighting resources can be brought to bear to shut the fire down if it has not already been contained. The physical design of the Project incorporates separation not only between the proposed units and infrastructure, but also an asset protection zone between the development and surrounds. To support firefighting efforts, the development has been designed to ensure firefighting vehicles are easily able to access the site and are provided sufficient water to undertake firefighting operations. This includes a dedicated 150,000-litre firefighting water tank. This is supported by the APZs proposed and along with a Bushfire Management Plan for operational staff.
Hazmat requirements; management of contaminated firewater	Potential battery fires are expected to be contained within the individual units, as each unit has internal fire-suppression systems designed and tested to comply with international and/ or Australian standards and guidelines. In the unlikely event of a major fire, procedures are proposed for the management of potential contamination including the establishment of a groundwater monitoring programs and action of any necessary management measures as detailed within the EIS.
Water hydrology and stormwater – 20 Submissions	
Proximity to Kilnacraft Creek, Bowna Creek, Dead Horse Creek and Lake Hume; runoff/erosion	In response to the Site's proximity to creek lines, the Project incorporates stormwater management measures to manage surface water flows. Best practice stormwater and sediment controls are proposed to be incorporated into the design, including construction and operation phases and includes swale and culvert be installed to prevent off-site runoff towards Kilnacraft Creek. Management of the Subject Site includes various management measures to minimise potential impact on water quality.



Concern raised	Response
Worst-case flood modelling	The submitted Flood Risk and Impact Assessment Report (Appendix N of the EIS) is prepared in accordance with the issued requirements for flood modelling, including a PMF event, and has been assessed by various government agencies and their specialists independent from the proponent of the development.
Contaminated firewater	Potential battery fires are expected to be contained within the individual units, as each unit has internal fire-suppression systems, including flammable gas, smoke and thermal sensors, pressure release systems and aerosol fire extinguishing systems. Therefore, the risk (likelihood and consequence) from small individual fires is not considered significant.
Need for independent hydrological modelling	The submitted Flood Risk and Impact Assessment Report has been assessed by various government agencies independent from the proponent of the development. Any input received from government specialists will be considered and where necessary measures implemented in response.
Contamination and hazardous substances – 20 Submissions	
PFAS / Bis-FASI and other “forever chemicals”	The use of PFAS group of chemicals in firefighting is banned in Australia. Any PFAS-like forever chemicals along with other hazardous chemicals in the batteries themselves are largely a risk at disposal rather than during operations. Due to the use of BESS units, the units are to be directed to an appropriate decommissioning firm to handle the batteries offsite. The management of chemicals will therefore be managed by the decommissioning firm in specifically designed and managed sites to avoid contamination. Risks during operation are also considered to be extremely low. Regardless of the risks, a range of barriers are incorporated into the design of the project to minimise any potential of chemicals escaping the individual batteries. Firstly, each individual battery is an air sealed unit to ensure potential for external materials are unable to penetrate the battery itself. The battery units form part of a battery pack which itself provides a seal avoiding dust moisture and condensation within the packs. These packs form part of a rack within the larger container unit which itself provides a physical barrier to the external environment and external physical damage. Further, all container units are to be placed upon the proposed concrete slab to further provide a barrier between the individual batteries and the underlying soil. It is considered that the proposed BESS includes sufficient barriers and contingencies to minimise any potential of internal chemicals leaking into the soil.
Leachate from damaged batteries toxic smoke/soot deposition	
Long-term soil & water contamination	
Lack of baseline testing and long-term monitoring.	
	Groundwater monitoring is not considered necessary at the Subject Site unless there is a major fire where fire-fighting water or chemicals are used, or another unforeseen leak occurs outside the expected small volumes of stored fuel. Should a major fire or other



Concern raised	Response
	event occur, then groundwater monitoring wells should be located up and down-gradient of the Subject Site. The up-gradient wells will be used as the baseline and compared to the down-gradient wells to determine any impacts to groundwater.
Economics & subsidies – 10 Submissions	
Claims of subsidy dependence	The proponent of this development is a private entity. Any public funding of the project is subject to alternative schemes to obtain and is not a consideration of this proposal.
Lifetime system costs	An Estimated Cost of Development has been prepared by a registered Quantity Surveyor in accordance with the relevant guidance.
Insurance/valuation impacts on neighbours	The proposed development location is adjoining an existing electrical substation operated by Transgrid. The co-location of these developments ensures impacts are consolidated in an existing location as part of a larger primary production area. Any impact on property or insurance value is considered to be negligible in this instance taking into account the location of the proposed development and the mitigations proposed.
Requests to compare lost agricultural value vs project benefits.	The Project will only temporarily impact approximately 7 ha of land that has moderate agricultural land capability however the land is not currently used for agricultural purposes but is used as a rural lifestyle block. The proposed decommissioning will aim to return the land to a level suitable for agricultural purposes.
Climate resilience – 8 submissions	
Use of historical vs projected extremes in design	All modelling undertaken as part of the EIS and supporting assessments have been undertaken in accordance with the legislated requirements and applicable guidelines.
Resilience to future heat/rainfall/drought	Flood impacts have been considered as part of the submitted and exhibited Flood Risk and Impact Assessment Report. Based on the modelling undertaken, a number of mitigation measures are proposed to manage potential flood impacts including the requirement to locate sensitive infrastructure including the BESS units 300 mm above the 1% flood even level. The BESS units will have active cooling to ensure heat impacts are appropriately managed during operations. Water use is largely associated with construction phase of the development for the purposes of dust suppression. Water use during operations is minimal and largely associated with the provision of stored firewater on site. As a result, the development is considered to have a suitable level of drought resistance.
Robustness of drainage and erosion controls.	Best practice principles to stormwater and sediment control be incorporated into the design, construction, operation, and decommission phases of the development. The measures will form part of the various management plans which are to be required.
Groundwater – 8 submissions	



Concern raised	Response
Reduced infiltration from hardstands	Based on available data, the groundwater level is generally >20 m. The reduced infiltration is therefore considered to have minimal impact. Mapped groundwater dependent ecosystems (GDE) are all located >5 km or more away and are unlikely to be impacted in the unlikely occurrence of groundwater contamination. As there will be no groundwater abstraction at the Subject Site the GDEs will not be impacted by changes in groundwater levels.
Potential contamination of shallow bores/stock water	Once operational, the only potential contaminant source is the potential for battery leakages however, the units are self-contained, with anti-leak connections, negating the potential for contaminant release. Operational measures will be put in place to ensure regular inspection and maintenance of the units will occur throughout the life of the project. This will include response measures to deal with any unlikely event of a leak.
Need for independent groundwater monitoring.	Groundwater monitoring is not considered necessary at the Subject Site unless there is a major fire where fire-fighting water or chemicals are used, or another unforeseen leak occurs outside the expected small volumes of stored fuel. Should a major fire or other event occur, then groundwater monitoring wells should be located up and down-gradient of the site and down-gradient to determine any impacts to groundwater. The up-gradient wells will be used as the baseline and compared to the down-gradient wells to determine any impacts to groundwater.
Biodiversity & soil ecology – 6 submissions	
Loss of soil organic carbon	The top soil of the development area is to be stockpiled and stored separately for use in rehabilitation works. This will ensure the top soil can be returned ensuring the pre-development state can be reinstated. Ratings of organic carbon and organic matter within the soil are both considered to be moderately rated.
Soil biota	The areas impacted by the BESS and associated infrastructure are cleared agricultural land which would be impacted by historic agricultural practices. A decommission plan will be required as part of any approval for the Project. The aim of the decommission plan will be return the site to viable agricultural use for the land owner. Based on input from the DPIRD, the proposed measures for decommission of the site are considered appropriate.
Pollinators	The areas impacted by the BESS and associated infrastructure are cleared agricultural land which would be impacted by historic agricultural practices. Agricultural practices already place strain on pollinators with the proposal considered to have minimal impact over the existing condition in this regard.



Concern raised	Response
Effectiveness of rehabilitation post-removal.	It is expected that the decommission works will return the site to the existing level of agricultural class. A decommissioning plan will be required as part of the proposed mitigations which will include management of soils and water.
JUSTIFICATION AND EVALUATION	
Energy need, grid role & alternatives – 13 Submissions	
BESS doesn't add generation or synchronous inertia	While the concern raised is not specific to the proposed development the below addresses the issue more generally. True, BESS do not generate power as they are a storage medium. In addition, it is also true that they do not provide physical synchronous inertia to the electrical grid as they utilise an inverter and have no spinning mass. However, inverter-based systems can contribute to inertia via a synthetic inertial response through implementation of specific hardware. The Australian Energy Market Operator expects the future inertial requirements can be met by a combination of both physical and synthetic systems. An example of a BESS designed to manage network reliability is the Waratah Super Battery.
Round-trip losses	It is true there is transmission losses when energy is transmitted between an energy source to the storage system and then back out to the grid and final user. However, the Project has been located to minimise losses by its proximity to the adjoining substation along with its proximity to multiple developed and approved solar farms in the Greater Hume LGA.
Questions on emissions benefit under realistic scenarios	Standalone BESS operations are agnostic to the generation source of the energy they receive and as a result the emissions reductions are dependent on the reductions in emissions caused through the transition to renewable energy sources. However, the proposed development has been located in proximity to multiple developed and approved solar farms in the Greater Hume LGA.
Claims of price and reliability downsides.	As discussed above, standalone BESS operations are agnostic to the generation source of the energy they receive and aim to store energy when it is cheapest for dispatch during the peak period. Currently, wholesale power prices are cheapest during the day when solar power generation is at its peak and greatest during the evening period when the sun goes down. BESS operations also contribute to network reliability as they can provide power when the power generators are unable to provide power or when demand exceeds generation. Other effects on the network can be managed through inertial systems as discussed above.
Governance, VPA & consultation – 12 Submissions	



Concern raised	Response
Perception of inadequate consultation	The submitted EIS was supported by community consultation which focused on the perceptions, concerns, and impacts on the local community. This community consultation was undertaken in accordance with the SEARs and the NSW DPHI <i>Social Impact Assessment Guideline for State Significant Project (2025)</i>. Further to this, the exhibition period lead by the DPHI ensures adequate consultation with the broader community, throughout NSW, and across Australia.
VPA's as coercive	Based on consultation Greater Hume Council has set an expectation of establishing a VPA for the development. This is a program it has undertaken with other Major Projects located within the LGA. Based on input from the local community during the proponent lead consultation, Council's program of requiring VPA's for Major Projects was well known with the community largely discussing how the funds could benefit the community.
Transparency and trust concerns	All documents related to this application are freely available on the Major Projects website. The broader community has this opportunity to provide input on the development with the assessment to be undertaken by the DPHI. Due to the number of submissions received, the development will be subject to determination by the Independent Planning Commission (IPC).
Requests to document meetings and resultant design changes.	This document includes a section discussing the required amendments to address input from Government Agencies and the community.
BEYOND THE SCOPE OF THE PROJECT	
National security & supply chain ethics – 9 submissions	
Dependence on Chinese supply chains	At this stage the specific BESS units have not been selected. Chinese manufactures are not the only option for sourcing BESS units with options including Tesla, LG, Panasonic, Sonnen, Wärtsilä, and Fluence Energy.
Slavery/ethics in materials	Leading battery manufacturers are committing to the use of ethically sourced and slavery free supply chains. Further, there is a requirement as an Australian business to comply with Commonwealth and NSW modern slavery laws.
Cyber-risk, Lack of disclosed cyber-resilience plans.	All connected systems require cybersecurity and is a matter for the operator to undertake during the operational phase of the project.



5.0 Justification

The responses and additional works in this RTS have been made with due consideration of the items raised in the submissions received by NSW government and private agencies and the general public.

The Jindera BESS is proposed to provide essential grid support and energy reliability for the regional network. The project contributes directly to the objectives of the *NSW Electricity Infrastructure Roadmap (2020)* and *Australia's Integrated System Plan (AEMO 2024)*, which collectively seek to deliver affordable, reliable, and clean energy to consumers while facilitating the orderly transition from ageing fossil fuel generation.

While the majority of submissions received during exhibition expressed general opposition to renewable energy projects and government energy policy, relatively few raised concerns that were specific to the Jindera BESS site, its design, or its localised environmental and social impacts. The project justification summary below responds to both general and site-specific matters.

- **Strategic and Policy Alignment**

The BESS supports the orderly transition to renewable energy by providing firming capacity, frequency response, and dispatchability. It is consistent with the *Electricity Infrastructure Investment Act 2020* and NSW planning policies for large-scale energy infrastructure.

- **Site Suitability**

The site's rural zoning allows energy infrastructure compatible with surrounding land uses. Investigations confirm the land as Class 4, suitable for low-intensity development while avoiding higher-value agricultural land. The compact footprint minimises disturbance and retains surrounding agricultural use.

- **Environmental Safeguards**

Comprehensive management plans address key risks:

- Fire safety: Separation distances, dedicated firewater storage, and FRNSW-endorsed emergency procedures.
- Water and contamination: Containment systems, PFAS-free fire suppression, and monitoring of surface and groundwater quality.
- Noise and visual impact: Compliance with NSW guidelines, acoustic controls, and landscape screening.
- Decommissioning: Rehabilitation and returning the land to productive use.

- **Community and Consultation**

Engagement with Council and local residents informed refinements such as improved firebreaks, access design, and landscaping. A community benefit program is proposed to deliver ongoing local support.

- **Economic and Regional Benefit**

The Jindera BESS represents a significant private investment creating construction employment, supporting local suppliers, and enhancing regional grid resilience. It contributes to stable energy prices and emission reduction targets.



- **Response to General Objections**

Many objections were directed at renewable energy generally rather than this specific proposal. The Jindera BESS has been assessed in accordance with the EP&A Act 1979 and relevant SEPPs and guidelines. It demonstrates appropriate site selection, environmental protection, and alignment with NSW energy objectives.



6.0 Conclusion

Through the implementation of best practice management, the potential environmental impacts associated with the Project can be appropriately managed, which will also address the community concerns raised during the community during the exhibition period. Given the net benefit and commitment from Jindera BESS to appropriately manage the potential environmental impacts associated with the Project, it is considered the Project would result in a net benefit to the region and broader NSW community.

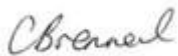
The Project is located within a predominantly rural setting, with surrounding land parcels to the north, south, east and west. The current use as rural lifestyle land with predominantly cleared land that is adjacent to the existing Transgrid 330 kV Substation in the southern portion of the Subject Sites and is separated from sensitive receivers such as residential areas and schools. The site provides for an advantageous and economically beneficial use of land in a landscape that has a history of electrical infrastructure alongside various rural land uses. The Project will provide both short-term and long-term benefits for NSW, including major investment in a sustainable, renewable electricity system and contributing to reduced electricity costs.

Most importantly, the Project will significantly reduce greenhouse gas emissions while providing baseload power, adding to local employment through the investment in renewable energy storage and the growth of new low carbon industries across the region.

It achieves the desired planning outcomes for the locality as established under the relevant legislation and policy framework. Given its overall consistency with planning controls and the absence of any significant adverse environmental impacts, the Project is considered to be in the public interest and worthy of being granted development consent subject to appropriate conditions.

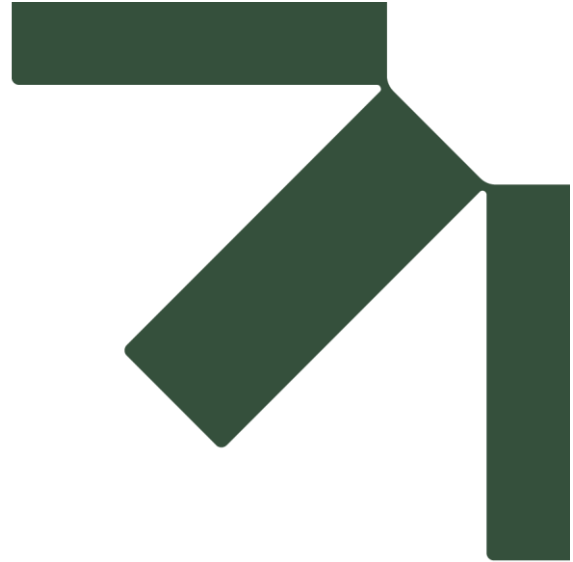
Sincerely,

SLR Consulting Australia

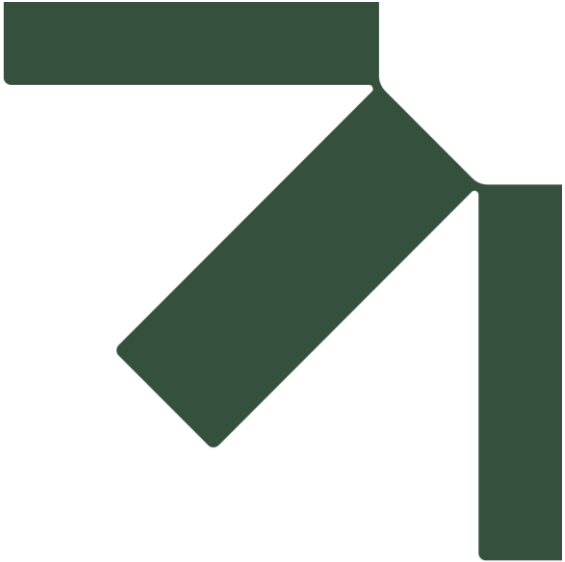


Clare Brennock
REAP Accreditation
Principal & NSW Team Lead – Planning

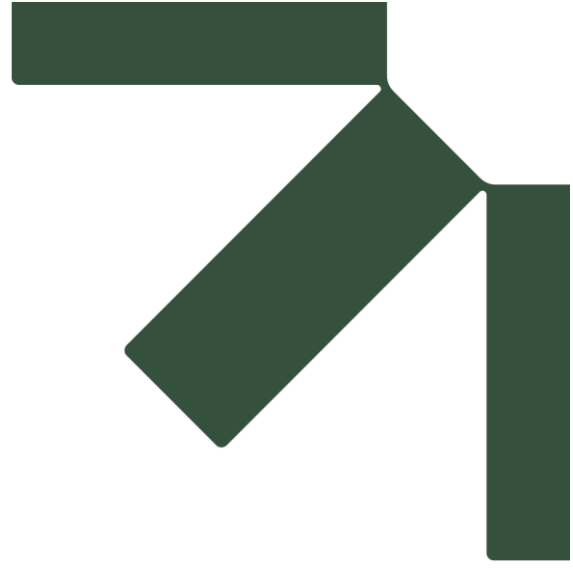




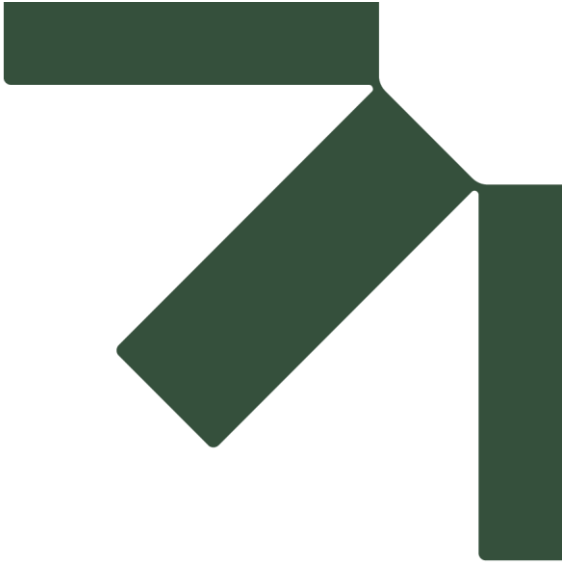
Appendix A Submissions Register



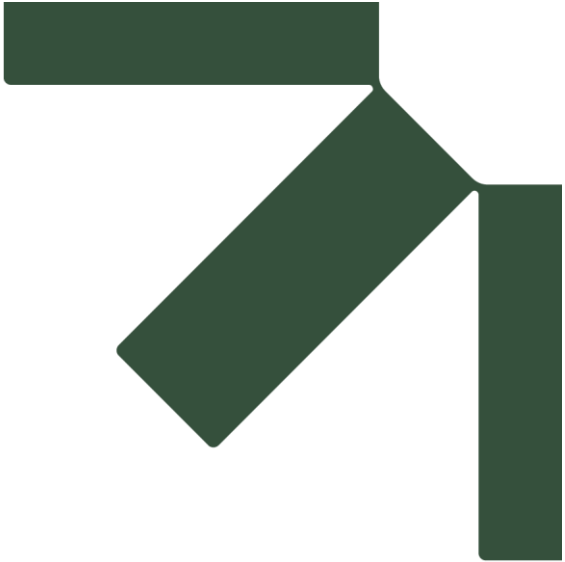
Appendix B Updated Waste Management plan



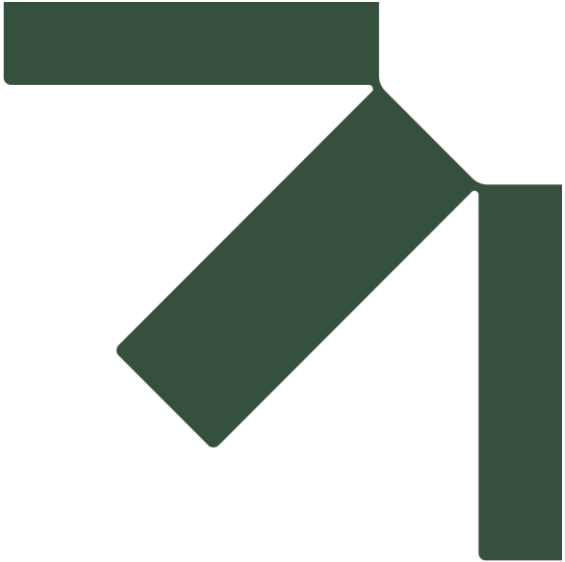
Appendix C Updated BDAR



Appendix D Updated ACHAR / AA



Appendix E Biosis Report



Appendix F Updated Preliminary Hazards Assessment

