

14 November 2024

Ewan Reid
Student Planner
Energy Assessments
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street,
Locked Bag 5022, Parramatta, NSW 2124

Dear Ewan,

Application Number - SSD-77443244

Project - Homebush Battery Energy Storage System

Location - Homebush Bay Drive, Homebush, Strathfield Local Government Area

Proponent - Ausgrid Operator Partnership

Strathfield Council has reviewed the Secretary's Environmental Assessment Requirements (SEARs) request submitted by Ausgrid Operator Partnership for a State Significant Development (SSD) at Homebush Bay Drive, Homebush where a Battery Energy Storage System (BESS) is proposed.

With regard to the Scoping Report prepared by AECOM, as well as Council's understanding of the current operation, the following is recommended for inclusion in the SEARS.

Biodiversity – Fauna Study

Council considers that the findings of the Environmental Assessment in Appendix E of the Scoping Report to be inadequate. Two fauna studies were conducted at similar times, one month apart in winter being the least active time of the year for fruit bats, amphibians, reptiles and many other faunas. Council requests that additional Fauna Studies are conducted with a greater scope of hours, at a more active time of year for fauna.

General Requirements – Homebush Transport Oriented Development State Environmental Planning Policy (TOD SEPP)

Council requests that the future TOD SEPP and its implications for the Homebush locality are considered in relation to the proposed development. In particular, the anticipated increased density and height will likely increase the number of residences with views and vistas over the site and increase vehicular and pedestrian movements in the area.

Council requests that a Visual Impact Assessment is prepared for the proposal in relation to both existing and future development. It should address the potential interface points between industrial and non-industrial land uses, likelihood of view creation from high rise development and general impact of new industrial land uses within a transitioning urban area.

Appropriate mitigation measures and design strategies should be brought forward in response to the assessment, noting the importance of the Homebush TOD as major urban renewal precinct.

Landscaping

The draft SEARs request that a Landscape Plan be provided and identify for on-site perimeter planting. Council also requests that the Landscape Plan identifies retention of existing vegetation (particularly native). The existing trees along the southern and southwestern boundaries currently provide a significant buffer to the Motorway and neighbouring property to the south-east. Retention and enhancement of a landscape buffer and significant trees around the site perimeters is requested by Council and should inform the Landscape Plan.

Additional plantings proposed in the landscaping schedule need to incorporate native, endemic species with particular attention to species capable of screening the development from adjoining uses. The EIS shall also give consideration to the visual amenity provided by the existing vegetation, regardless of the ecological value, and its contribution to the screening of the site and the existing urban canopy.

Urban Canopy

The State Government has set a target for the Greater Sydney Area to achieve an Urban Canopy Target of 40%. Council requests that a study is conducted which includes the pre-development and post-development canopy coverage, and the findings of the study should be included in the EIS.

It is Council's position that where trees are proposed to be removed, replacement planting of canopy tree plantings need to be incorporated into the Landscape Plan at a rate of 2:1 to ensure no net loss of canopy coverage.

Low Reflectivity Materials

Council requests that the design of the BESS incorporate a schedule of materials and colours which are of low reflectivity to improve the visual amenity of the site, particularly when viewed from afar.

Stormwater Generation

The proposal will likely increase the prevalence of hardstand on the subject site. Council requests that the EIS is accompanied by a Stormwater Management Plan which demonstrates that the existing stormwater network has the capacity for increased stormwater runoff from the proposal and includes details of any required stormwater infrastructure upgrades where necessary.

Hazards - Fire Fighting

The Scoping Report identifies an automatic firefighting system will service the proposal. Council requests that the design and layout of the BESS give consideration to access arrangements for firefighting vehicles, in the event that they are required to attend the site.

Proximity to Sensitive Infrastructure

Council requests that the EIS considers proximity to other infrastructure, in particular underground high pressure pipeline infrastructure and that the APA Group is contacted to determine if the development is appropriately sited with regard to any gas lines in the locality.

A Risk Assessment should be completed in response to these findings, in accordance with Planning Circular PS24-005 (dated 1st August 2024).

Acid Sulfate Soils

The works are on land identified as Class 2 Acid Sulphate Soils. Works below the natural ground level are envisioned and soil disturbance greater than 1 tonne of soil will likely result during the demolition and construction phase of the development. The provisions of the Strathfield Local Environmental Plan 2012 require an Acid Sulphate Soils Management Plan which has been prepared in accordance with the Acid Sulfate Soils Manual.

Current Proposals

Council is in receipt of PAN-487603 proposing paper subdivision of Lot 1/-/DP1218218 into two Torrens Title lots, comprising proposed Lot 1 containing the existing substation and proposed Lot 2 containing surplus land upon which the BESS is proposed. It is noted that the Scoping Report makes no mention of the proposed works or intention to subdivide the land.

Should you have any queries or wish to discuss the above, please feel free to contact Dylan Porter, Manager, Planning & Place on 02 9748 9999.

Yours sincerely,



14.11.24,

Clare Harley
Director Planning and Environment