STRATHFIELD COUNCIL

65 Homebush Road, Strathfield NSW 2135
PO Box 120, Strathfield NSW 2135 | **P** 02 9748 9999 | **F** 02 9764 1034
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17 July 2025

Pragya Mathema
AUSGRID
24-28 Campbell Street,
Sydney, NSW, 2000

Dear Pragya Mahema,

Cover Letter to Submission - State Significant Development (SSD-77443244) – Homebush Battery Energy Storage System (BESS) 10 Homebush Bay Drive, Homebush

Thank you for the opportunity to provide comments on the proposed SSD – for construction, operation and maintenance of the Homebush BESS (the Project) adjacent to the existing Ausgrid 132 kilovolt (kV) Mason Park sub-transmission switching station (STSS). Council staff have reviewed the proposal and prepared a submission which is attached below.

In general, Strathfield Council officers remain supportive of the project in principle. However, before support can be provided for the project, Strathfield Council is seeking better resolution of the following key issues:

- Urban design response that integrates the design and appearance of the project with surrounding urban areas. This is particularly noting the future urban community with the Homebush TOD Precinct.
- The development result in total loss of vegetation and urban tree canopy. The project needed to bring forward appropriate replacement trees loss and demonstrate a no-net loss of urban tree canopy cover.
- Resolution of technical items as detailed in the covering letter.

Please note that these comments are officer comments only. The submission will be presented to Council for endorsement which may result in additional feedback or comment.

Please contact Louise Gibson – Senior Planner on 9748 9999 or louise.gibson@strathfield.nsw.gov.au for any further correspondence or to discuss Council's input.

Regards,

Dylan Porter
Acting Director, Planning & Environment

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Strathfield Council Draft Submission to State Significant Development (SSD-77443244) – Homebush Battery Energy Storage System (BESS) – July 2025

Strathfield welcomes the opportunity to provide comments on the application for SSD – Homebush Battery Energy Storage System. It is understood that the proposed works include:

- Construction and operation of a BESS with capacity of approximately 200 MW. Battery units would be approximately 2.5m in height and provide a footprint of approximately 3.5m x 7m arranged in a series of rows.
- Compacted gravel or concrete slab works for batteries
- Underground connection of the BESS to the Mason Park STSS (Sub-transmission Switching Station)
- Construction of an operations building with a control room and switch room.
- Construction of a workshop area to support ongoing operational and maintenance activities
- Provision of internal roads, construction and equipment laydown areas and car parking
- Other associated and ancillary infrastructure, including, fire suppression, drainage and stormwater management, security fencing, lighting, and CCTV.

Once constructed, the project would operate 24/7 as an unmanned facility. The site will only be manned for both planned and unplanned maintenance periods only.

Council has now reviewed the Environmental Impact Statement (EIS) and other supporting documentation. The following comments are provided for consideration by the Department of Planning, Housing and Infrastructure.

Urban Design

Further assessment is required to adequately demonstrate how the proposal will integrate with the surrounding streetscape, particularly noting its interface with surrounding residential areas. The following considerations should be made:

- Additional visual impact assessment regarding surrounding residential areas which should capture 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. This will ensure appropriate mitigation measures and design strategies are explored prior to approval and construction phase of the development.

- Additional visual impact assessment should consider views with and without tree cover on the site in order to provide a more accurate representation of how the development will appear from all views looking toward the site.

- More appropriate and considered external fencing treatments to enable the works to better integrate with the surrounding streetscape. A high-quality material such as brickwork or sculpted panel fencing in a more subdued colour would assist in concealing the hardstand elements on the site whilst positively contributing toward the streetscape.

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Landscaping

The State Government has set a target for the Greater Sydney Area to achieve an Urban Canopy Target of 40%. Strathfield Council's 2022 canopy data suggests that canopy cover is at 16.7% for the entire LGA. The proposal results in a significant loss of canopy tree cover and landscaping which would contribute toward further loss of total canopy cover of the LGA. It is Council's position that where trees are proposed to be removed, replacement planting of canopy tree planting should be provided at a rate of 2:1 to ensure no net loss of canopy coverage.

The SEARs requires a draft Landscaping plan for on-site perimeter planting to be provided with evidence that it has been developed in consultation with affected landowners.

This does not appear to have been included in the latest submission of supporting documentation. Presently the project visualisations show no landscaping within or to the perimeter of the site, which is not an acceptable outcome.

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) so to minimise the appearance of hardstand areas on the site as viewed from its immediate surrounds.

Traffic Assessment

As this SSD impacts the State Road Network, Council should be guided by the comments provided by TfNSW as follows:

- 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. Specifically, TfNSW requests further assessment of the following signalised intersections:
- 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 5-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.
- Details of road upgrades, infrastructure works, or new roads or access points required for the development.

Council expects these details are considered when preparing a construction CTMPT which is to be provided to Council for review.

Development Engineering

The accompanying water impact assessment for the subject project did not provide any indication of providing 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.

It is considered that the proposed erosion controls during excavation, construction and operation stages and methods adopted are considered satisfactory.

Environmental Health

Preliminary and Detailed Site Investigation (PSI/DSI)

- The report noted there is potential contamination risks within portions of AEC01 and AEC03 have not yet been fully assessed due to access constraints during works onsite. This is a data gap that needs addressing in order to draw conclusions regarding site suitability in the context of land contamination.
- The PSI/DSI concludes that the site is largely suitable for the proposed industrial use, subject to the undertaking of a supplementary contamination assessment (SCA) within areas not yet assessed.
- Site within area potentially affected by acid sulfate soils (ASS) (class 2 and 5). ASS have not yet been adequately assessed across the site due to access constraints during site works, resulting in an inadequate number of sampling points being utilised, as well as being assessed to an inadequate depth based on updated proposed development information. This is a data gap that needs addressing in order to draw conclusions regarding management of acid sulfate soils at the site during redevelopment works.
- The consultant recommends:
    - A Supplementary Contamination Assessment (SCA) to address data gaps in AEC01 and AEC03 after site obstructions are cleared.
    - If contamination risks remain, prepare a Remedial Action Plan (RAP) and/or an Acid Sulfate Soils Management Plan (ASSMP) to manage risks during works.
    - All further work should be done by a qualified environmental consultant.

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Noise and Vibration Impact Assessment

- The Noise and Vibration Impact Assessment appears robust. Predicted operational noise levels comply with the NSW Noise Policy for Industry criteria, and no significant vibration impacts are anticipated.
- The predictive noise modelling results for the Project, with acoustic mitigation measures in place, indicate that compliance with the established noise criteria at all receptors can be achieved. Compliance is reliant on acoustic barriers being installed as outlined in Figure 6 and operational fan speeds being restricted as specified in Section 8.4.2. Therefore, with the acoustic mitigation measures in place, the Project is unlikely to result in adverse amenity impacts to nearby receptors.
- Construction activities may generate elevated noise levels at times, but impacts are reported as manageable with mitigation measures.

Scoping Report

- Construction dust emissions anticipated - Standard dust suppression during works
- No major ongoing air emissions from operation
- Existing structures onsite may contain: Asbestos, lead-based paints, other hazardous materials
- Proposed - pre-demolition hazardous materials survey, safe removal and disposal

From an Environmental Health perspective, the submitted documentation appears sufficient to support progression of the SSD.

Conclusion

Thank you again for the opportunity to provide feedback on your SSD. As addressed above, Council has raised concerns over the development as it pertains to urban design, tree management, traffic, site contamination, acoustics & development engineering.