

Our Reference: KA:MH: 2332306
Your Reference: SSD:75680468
PAE-99771207
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Via Major Projects Portal

Wednesday, 10 December 2025



RE: Stoney Creek Battery Energy Storage System (SSD-75680468) – Advice on EIS (PAE-99771207)

Narrabri Shire Council appreciates the opportunity to comment on the Environmental Impact Statement (EIS) for the proposed Stoney Creek Battery Energy Storage System (BESS).

It is understood that the proposed development includes:

- A 125 MW / 8-hour BESS facility,
- 192 containerised battery units,
- 64 inverters,
- Hardstand and ancillary infrastructure including control room, transformers, switchgear, harmonic filters, emergency equipment, internal access, security lighting, and underground cable connection to TransGrid's 132/66 kV Narrabri Substation.

Council recognises the strategic importance of renewable energy storage infrastructure. The project has is reported by the applicant to potentially to improve grid reliability and support renewable generation across the region.

However, as an impacted local government authority, Council must ensure that the project's impacts - particularly those relating to traffic, local infrastructure, emergency management, amenity, biodiversity and land-use compatibility are appropriately assessed, mitigated, and addressed through robust consent conditions.

1. Fire, Safety & Emergency Risk

Given the battery chemistry and scale (125 MW / 1,000 MWh), the project presents inherent risks associated with thermal runaway, flammable off-gassing, and fire.

While the EIS provides indicative management measures, Council recommends:

- A detailed Fire and Emergency Management Plan endorsed by NSW RFS and Fire & Rescue NSW prior to construction.


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- Confirmation that container spacing, electrical isolation zones, and emergency shut-down systems meet or exceed relevant standards.
- Provision of specialised BESS firefighting training and equipment to local emergency services by the proponent.
- Installation of early-warning gas detection, smoke/heat monitoring, and remote shut-off capability.
- Demonstration that separation distances limit propagation risk between containerised battery units.

2. Noise and Amenity

Operational noise sources include containerised cooling systems, inverters, transformers and auxiliary equipment. Council notes the EIS concludes compliance with the Noise Policy for Industry. However, Council recommends:

- Post-commissioning noise monitoring to confirm modelled compliance.
- Noise mitigation measures incorporated into final equipment specifications (low-noise fans, silencers).
- Restrictions on nighttime maintenance involving loud tools or plant.

3. Traffic and Access

This section integrates the detailed findings from the Traffic Impact Assessment (APPENDIX O).

The BESS will be accessed via Stoney Creek Road, characterised by:

- Narrow width (~5.6 m in sections)
- Rural standard, sealed in parts and unsealed in others
- Very low traffic (<10 vehicles/hour)

Old Cemetery Road, Doyle Street, and the Newell Highway provide regional connectivity.

A rail level crossing exists on Doyle Street.

Construction Traffic is the dominant traffic generator with the movements indicated in the TIA report significantly exceeding existing road usage and creating disproportionate impact on Stoney Creek Road and local Narrabri streets (particularly Doyle Street).

Given the intensity of construction traffic and narrow local road conditions, Council requests:

3.1 Construction Traffic Management Plan (CTMP) to include:

- One-way controls on Stoney Creek Road
- Traffic Guidance Schemes (TGS) for access works
- Driver Code of Conduct and training for all drivers
- Restricted delivery times
- Safety protocols at the rail crossing

3.2 Pre and post construction dilapidation surveys for:

- Stoney Creek Road
- Old Cemetery Road
- Doyle Street

3.3 OSOM Route Study

- for transformer and switchgear deliveries.

Additional Council Conditions:

3.4 Road Maintenance Contribution Agreement

- The Developer must fund all road rehabilitation attributable to construction traffic and based on road conditions and pre and post construction dilapidation surveys.

3.5 School / township traffic controls

- No heavy vehicles through Doyle St or near schools during 8:00am - 9:30am or 2:30pm – 4:00pm.

3.6 Emergency vehicle access guarantee

- Two-way access for emergency vehicles must be maintained at all times, including during one-way traffic controls.

3.7 Local community notification program

- Advance notice of heavy vehicle movements, OSOM deliveries, road shoulder closures, etc.

4. Biodiversity and Land Management

Key issues include vegetation clearing, fauna disturbance and potential impacts on downstream water quality. Council supports the proposed mitigation measures but recommends:

- Development of a Biodiversity Management Plan prior to construction, this is to implement and maintained for the life of the project.
- Weed, hygiene, and sediment controls in accordance with the Blue Book.
- Ongoing ecological monitoring until post-construction stabilisation.

5. Flooding and Stormwater Management

Battery containers and electrical infrastructure must remain functional and safe during major rainfall events. Council requires conditions ensuring:

- Finished surface levels and hardstands remain above the defined flood level.
- Stormwater incorporates first flush retention, sediment controls and diversion drains.
- Any contaminated water following a fire event must be contained onsite.

6. Visual Impact and Lighting

Although the site is low-profile, stacked container heights, fencing and lighting may create local amenity impacts. Council recommends:

- Vegetated perimeter screening
- Downward-facing lighting complying with relevant standards
- Avoidance of excessive light spill impacting rural residents

7. Decommissioning and End of Life

Council requires a Decommissioning and Rehabilitation Plan to ensure:

- Responsible removal and recycling of battery components
- Removal of all above-ground infrastructure
- Final landform compatible with surrounding agricultural land uses
- Financial assurance to guarantee end-of-life works

8. Recommended Conditions

Council recommends the following consent conditions:

1. Fire and Emergency

- Final Fire & Emergency Management Plan approved by NSW RFS and FRNSW
- Early-warning systems, fire segmentation, gas detection, remote shutdown
- Training and equipment support for local emergency services

2. Traffic and Access

- CTMP (detailed above)
- Road dilapidation surveys & rehabilitation obligations
- BAL treatment completed before major construction
- OSOM restrictions and route approvals
- Road maintenance contribution agreement

3. Environment, Landscape and Stormwater

- Biodiversity Management Plan
- Soil, erosion and sediment controls
- Flood-safe design
- Landscape screening and lighting controls

4. Decommissioning

- Comprehensive Decommissioning & Rehabilitation Plan
- Removal of all infrastructure and battery units
- Recycling commitments for battery systems
- Financial assurance bond

9. Voluntary Planning Agreement (VPA)/Benefit Sharing

- Voluntary Planning Agreement (VPA)
Early discussions between the proponent and Narrabri Shire Council regarding the

scope and content of a Voluntary Planning Agreement (VPA) are encouraged. Any proposed VPA must be separate from, and in addition to, any payments or works required for the upgrade of existing local roads or the construction of new roads associated with the project.

In accordance with standard practice, all road upgrades and/or improvements required as a result of the project are to be fully funded and undertaken by the proponent prior to the commencement of construction, and in accordance with future conditions of consent.

The requirement to enter into a VPA is to be included as a condition of development consent.

In the unlikely event that a VPA cannot be agreed, the NSW Government, as the consent authority, must impose relevant Section 7.12 contributions in accordance with the Narrabri Shire Council Section 7.12 Contributions Plan to recover the cost of impacts on local infrastructure and services, including roads.

- Benefit Sharing Guidelines

It is noted that the proposed Stoney Creek Battery Energy Storage System (BESS) is a stand-alone development and is not co-located with other energy or industrial developments.

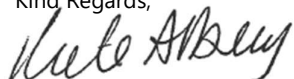
Any benefit-sharing agreement between Narrabri Shire Council and the proponent must appropriately reflect the impacts of the development on the Narrabri community. As such, it is required that the benefit-sharing contribution be set at a level commensurate with impact, proposed at \$8.50 per megawatt hour produced.

This contribution would enable Narrabri Shire Council to establish a Community Fund or Future Fund to deliver long-term benefits to the Narrabri community.

Council thanks the Department for the opportunity to comment and requests to remain actively consulted during future approval stages.

Should you have any further questions or require any further clarification on the contents of Council's correspondence, please contact Council on (02) 6799 6866 or via email council@narrabri.nsw.gov.au.

Kind Regards,

A handwritten signature in black ink that reads "Kate Alberry". The signature is written in a cursive, flowing style.

Kate Alberry

Director Development and Compliance