

Our ref: SSD-79933225

Ms Fiona Lambert
Project Development & Compliance – Group Manager
LMS Energy Pty Ltd
199 Churchhill Road
PROSPECT, SA 5082

Attention: Mr Karl Rosen, GHD Pty Ltd

22 December 2025

Subject: Request for Additional Information - SSD-79933225

Dear Ms Lambert

I refer to the Department of Planning, Housing and Infrastructure's (the Department) letter on 9 December 2025, which advised that the Department would be providing comments following the exhibition of the Environmental Impact Statement (EIS) for the Lucas Heights Bioenergy Facility (SSD-79933225).

As part of your response to submissions (RtS) report addressing submissions and advice received during exhibition of your application, the Department requests you provide a response to the issues include in **Attachment 1** to this letter.

If you have any questions, please contact Ellen Luu on (02) 8275 1037 or via email at ellen.luu@planning.nsw.gov.au.

Yours sincerely



Joanna Bakopanos

A/Director

Industry Assessments

as delegate for the Planning Secretary

Attachment 1

Air Quality

1. The Air Quality Impact Assessment demonstrates compliance with relevant criteria under normal operating conditions, based on assumptions regarding effective landfill gas (LFG) capture and treatment. However, the EIS does not adequately assess how air quality and odour may vary under changing landfill conditions or non-routine operating scenarios. Further information is required to clarify the following:
 - details of how air quality and odour may be affected by changes in LFG capture efficiency during non-routine operating conditions, including commissioning, maintenance activities, operational disruptions and prolonged flaring.

Bushfire Risk

2. The EIS identifies that the site is located on bushfire-prone land and includes a bushfire assessment for the proposal. However, consideration of potential bushfire risk and landfill gas capture, flaring and bioenergy facility operations is not clear. Further information is required to clarify the following:
 - details on how the bioenergy facility will operate safely during bushfire events, including management of landfill gas extraction and flaring infrastructure
 - emergency access arrangements, on-site fire safety infrastructure, water supply capacity and evacuation measures relevant to the bioenergy facility, including references to site layout where required
 - how emergency response arrangements for the bioenergy facility will align with and be coordinated through broad Lucas Heights Resource Recovery Park (LHRRP) emergency management processes.

Leachate Management

3. The EIS describes existing landfill leachate (at the LHRRP) and condensate management (at the existing power station facility), however further clarification is required to demonstrate how leachate will be managed to avoid potential ingress into LFG wells, pipework and condensate systems and to prevent adverse impacts on LFG quality and system performance at the bioenergy facility.
4. Further information is required to explain how changes in waste moisture content and leachate generation over time may influence landfill gas quality and composition, and how

these changes will be monitored and managed to ensure the ongoing performance and operations at the bioenergy facility.

Noise

5. The Noise Impact Assessment identifies potential exceedances of applicable noise criteria at locations adjacent to areas identified for future recreational use within the LHRRP. The EIS does not adequately justify the absence of mitigation measures to address these exceedances. Further information is required to clarify how noise impacts on future recreational users will be addressed.

LHRRP Landfill Closure

6. The Department notes that the EIS does not adequately address how the ongoing operation of the bioenergy facility will interact with Cleanaway's obligations to complete landfill closure at the LHRRP in accordance with the EPA Solid Waste Landfill Guidelines (2016). In particular, further clarity is required regarding how closure certification and finalisation of closure obligations will be achieved while landfill gas infrastructure continues to be operated by a third-party operator. Further information is required to address the following:
 - clarification on how landfill closure obligations will be achieved by Cleanaway while landfill gas infrastructure continues to be operated by LMS
 - details of responsibilities, access arrangements and long-term liabilities between Cleanaway and LMS will be managed to enable completion of landfill closure obligations in accordance with regulatory requirements.

Future Land-use

7. The Department notes that while the EIS acknowledges future rehabilitation and the final landform of the LHRRP, including its intended use as future public parklands, the EIS does not sufficiently demonstrate how the proposed bioenergy facility will integrate with future land uses over the long term. Further information is required to address the following:
 - how visual amenity will be maintained from key future parkland viewpoints over the operational life of the bioenergy facility
 - clarification as to whether amenity mitigation measures (including noise, air quality and visual mitigation) will be reviewed and updated over time to reflect changing land uses and increased sensitivity as the LHRRP transitions from an operational landfill to rehabilitated public parklands.