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Subject: Request for Information (RFI-83724707)
Our Ref: 30180771 RFIs
Date: 14 October 2025

Dear Pragya,

This letter has been prepared to provide responses to the three Requests for Information (RFI) from the Department of Planning, Housing and Infrastructure (DPHI), dated: **8 May 2025** and **26 May 2025**, and an additional email RFI from DPHI dated: **31 July 2025** in relation to the amended operational noise assessment.

RFI 1 is supported by an EIS Amendment Operational Noise Assessment - 1080 MWh Layout (Resonate, July 2025) (refer to Attachment 1). RFI 3 is supported by a Hydrogeological assessment (Arcadis, June 2025) (refer to Attachment 2), and an updated Traffic Impact Assessment (Arcadis, September 2025) (refer to Attachment 3).

Yours sincerely,



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CC. Jose Opaza (Iberdrola), Maria Caruda (Iberdrola)

Enclosed: Attachment 1, Attachment 2, Attachment 3

RFI 1: Demonstration that the battery size and capacity proposed can be operated in compliance with the relevant operational noise criteria;

- Iberdrola are yet to select an OEM supplier but have identified a potential supplier that is much noisier to operate.
- The EIS Amendment Operational Noise Assessment (May 2025; reference S230482RP3A), assessed a noisier BESS supplier, but for a smaller number of batteries (142 enclosures) to demonstrate the worse case scenario for high temperature conditions expected to occur 10% of the time.
- An updated BESS operational scenario has been modelled. This updated scenario reflects the configuration and operational characteristics of a revised indicative equipment supplier, capable of delivering an output of 1080 MWh. This model is based on 260 battery enclosures.
 - A review of the predicted noise levels when applying the criteria from Section 2.1 in the EIS Amendment Operational Noise Assessment (May 2025) indicates that compliance with the baseline NPI criteria is expected for the typical scenario (up to 90% of any season).
 - The noise levels predicted at sensitive receivers for the worst-case during 10% of any season, shows criteria exceedances of up to 5 dB(A) during the daytime and up to 3 dB(A) during the evening for the worst-case temperature conditions (up to 10% of any season), at residences R2, R3, R9 and R16.
- It is due to the findings of this recent modelling outlined in the EIS Amendment Operational Noise Assessment - 1080 MWh Layout (Resonate, July 2025) (refer to Attachment 1), that Iberdrola is seeking the relaxation in the noise criteria for the worst-case scenario. This scenario is expected to happen when temperatures are very high, and the battery cooling systems are required to run at a high duty factor to allow for sufficient battery cooling. This is estimated to occur 10% of the time.

RFI 2: Further clarification of the energy storage capacity, sizing, battery chemistry and number of batteries proposed for the project, to establish the equivalence or differences from the originally assessed battery and demonstrate that adequate area has been allocated;

- Iberdrola is seeking approval for 1,080 MWh energy storage capacity.
- Energy storage capacity in MWh and the size (m²) of the battery enclosure is as follows:
 - Each unit has a nominal rated capacity of ~3,917 kWh
 - Indicative dimensions of 8.8 metres (L) x 1.65 metres (W), result in a footprint of ~14.52 m² per enclosure.
- As previously assessed in the EIS and the Amendment Report, the technology remains **lithium iron phosphate (LFP)**.
- The number of batteries proposed
 - The number of enclosures proposed, will depend on the OEM supplier. The EIS Amendment Operational Noise Assessment (May 2025; reference S230482RP3A) assessed a supplier that would install 260 enclosures to achieve the 1,080 MWh capacity requested for approval.
- The spacing between battery units and justification for the spacing;
 - The spacing applied between battery enclosures follows manufacturer-specific requirements to ensure safe operation, accessibility and fire mitigation.
 - The indicative OEM Design and Operation manual indicates different clearances to consider, e.g. rear-to-rear clearance of ~0.46 metres, front clearance of ~2.44 meters.
 - Final clearances will be confirmed through detailed engineering design and inputs such as the selected OEM's installation requirements and the project's fire safety study.

- **Allocated area**
 - The EIS Preliminary Hazard Analysis (PHA) (May 2024) originally assessed B-Vault DC model which integrates batteries, battery management system, thermal management system, and safety features. The battery unit would be enclosed in a 9.99 meter (L) x 2.44 meter (W) x 2.93 meter (H) container (~29 m²) rated to IP 55 and NEMA 3X, suited for outdoor use. Each unit will be approximately 5,963 KWh (4 hours storage). If 184 enclosures are required, this would require an area of roughly of 5,400m².
 - Based on the amended operational noise assessment (July, 2025) and as discussed above, the dimensions of the battery enclosure supplied by the indicative OEM supplier is 8.8 metres (L) x 1.65 metres (W), which results in a footprint of ~14.52 m² per enclosure, approximately an area of 4,500 m². The area allocated for the BESS is approximately 5,500 m², as shown in Figure 1-2 of the Amendment Report. This allows sufficient space within the allocated BESS area.
 - The alternative battery model under consideration in the Amendment Report and associated noise modelling, is a commercially available, rigorously tested product already deployed in large-scale energy projects worldwide.
 - The system complies with key international safety standards including UL 1973, UL 9540, UL 9540A, UL 1741 SB, IEC 62109, and IEC 61427.
 - Final testing requirements and validation of OEM-specific parameters will be confirmed through detailed design and updated risk assessments once the supplier is formally selected.

RFI 3: a response to the correspondence received from NSW DCCEE Water Group dated 2 May 2025; Tamworth Regional Council dated 22 May 2025; and TfNSW dated 23 May 2025.

- A response to NSW DCCEE Water Group's RFI (dated: 2 May 2025) was provided to DPHI on 17 June 2025 with a covering letter and a Hydrogeological assessment (Arcadis, 10 June 2025) (refer to Attachment 2) confirming the groundwater bore identified for water supply during construction and operation of the Kingswood BESS project will meet the water demands of the project, with recommendations for further inspections/ investigations during detailed design.
- A response to the RFI's from Tamworth Regional Council (dated: 22 May 2025); and TfNSW (dated: 23 May 2025) has been provided in a covering letter and an updated Traffic Impact Assessment (TIA) (Arcadis, 5 September 2025) (refer to Attachment 3).

DPHI email RFI - 31 July 20205: Clarifications sought by DPHI in relation to the amended operational noise assessment:

- **Provide further information on why properties R9 and R16 are predicted to experience an increase of 5 and 3 dB respectively when comparing the noise modelling results in the Resonate May 2025 report and the Resonate July 2025 report.**
- **Would it be possible to provide mitigation specifically to offset predicted increases to properties R9 and R16 so that they do not experience additional increases.**

- The predicted noise increases to R9 and R16 have occurred in the EIS Amendment Operational Noise Assessment (Resonate, 18 July 2025, Reference: S230482LT4) due to an updated layout/orientation of the indicative BESS (when compared to the EIS Amendment Operational Noise Assessment (28 May 2025, Reference: S230482RP3).
- The noise wall location and heights used in the EIS Amendment Operational Noise Assessment (Resonate, 18 July 2025, Reference: S230482LT4) were based on the noise wall layout documented in the Environmental Impact Statement (June 2024), where compliance was achieved with reduced noise wall heights of 5-6 m for the southern/eastern noise walls. To provide mitigation to these properties (R9

and R19), noise levels could be slightly reduced if the indicative noise wall heights in this location were increased. An additional mitigation measures (NV9) will be provided in the updated mitigation measures presented in Appendix C of the Kingswood BESS Amendment Report 2 (October 2025).

Attachment 1 – EIS Amendment Operational Noise Assessment - 1080 MWh Layout

Attachment 2 – Hydrogeological assessment

Attachment 3 – Traffic Impact Assessment (updated)