

Nicholas Fox
Senior Project Manager
Neoen Australia Pty Ltd
570 George Street
Sydney, NSW, 2000

09/09/2025

Subject: Culcairn Solar – Fire Safety Study and Emergency Plan Staging

Dear Mr Fox

I refer to Neoen's request to the Department of Planning, Housing and Infrastructure (the Department) to further stage the construction of the battery energy storage system (BESS) for the Culcairn Park Solar Farm (SSD-9097), the Fire Safety Study and Emergency Plan. The Fire Safety Study is required to be prepared prior to the commencement of construction of the BESS under Condition 27 of Schedule 3 and the Emergency Plan is required to be prepared prior to construction under Condition 31 of Schedule 3.

The request to stage the plans is made under Condition 3, Schedule 4 of the development consent which allows for the staging of strategies, plans or programs. The Department notes that the project has been staged as follows:

- Stage 1a: Construction of the site access point on Weeamara Road and the road upgrades along Weeamara Road up to the unused rail corridor, land preparation;
- Stage 1b: Upgrade of Weeamara Road including the unused rail corridor (not covered in Stage1a) and commencement of construction of the solar farm;
- Stage 2: Continuation of the construction of the solar farm and the transport of OSOM vehicles as described Condition 2 of Schedule 3 of the Development Consent;
- Stage 3: Operation of the Culcairn Solar Farm;
- Stage 4: Construction, commissioning, and operation of the battery energy storage system (BESS), including substation and switchyard expansion (within the development footprint) if the battery proceeds later; and
- Stage 5: Decommissioning the Culcairn Solar Farm at end of life

In your correspondence of 5 September 2025, Neoen has formally requested that Stage 4 be further staged as follows:

- Stage 4a: commence preliminary works associated with the construction of the BESS;
- Stage 4b: continuation of BESS construction including the delivery and storage of batteries on site;

- Stage 4c: continuation of BESS construction including the installation of batteries on site
- Stage 4d: commissioning of the BESS; and
- Stage 4e: operation of the BESS.

In making this request, Neoen has also noted and agreed to the following considerations in relation to the staging approach:

- The FRNSW Position Statement Summary 'Open yard storage of battery energy storage systems (BESS) requires the provision of an Emergency Plan, prior to the delivery and storage of batteries on site. Hence the Emergency Plan must be approved prior to Stage 4b and, the delivery and storage of batteries on site;
- While a preliminary Fire Safety Study must be developed to inform the preparation of the Emergency Plan, a revised Fire Safety Study for the development must be prepared to the satisfaction of FRNSW and the Planning Secretary, prior to Stage 4c continuation of BESS construction including the installation of batteries on site;
- The commencement of any construction activities associated with the battery energy storage system, including trenching, cabling, or laying of battery concrete foundations is undertaken at Neoen's own risk of potential re-design requirements required by the approved Fire Safety Study; and
- all other management plans will be prepared, reviewed and updated in accordance with the requirements of the consent, including consultation and engagement with relevant agencies and representatives.

Accordingly, as the nominee of the Planning Secretary, I agree to the proposed staging and management plan submissions.

If you have any questions, please contact Keren Halliday, who can be contacted on 02 8289 6444.

Yours sincerely



Wayne Jones
Team Leader - Post Approval
Energy Assessments

As nominee of the Planning Secretary