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**Subject: WALLERAWANG BATTERY ENERGY SYSTEM – SHELL ENERGY Approval Modification –  
Amendment Report (SSD-14540514-Mod 1)**

Date: 23 September 2025

Dear Sam,

Thank you for providing the agency's advice received on the Wallerawang Battery Energy Storage System project. In response to the letter submissions, we have prepared the following tables which summarises the agency comments and to provide further clarification where necessary. We have also noted where no further action or response is required.

Should further clarification on the information provided below be required, we would be willing to set up a meeting with the Department and relevant agency(s) to discuss any outstanding issues.

Yours sincerely,

Heather Tilley

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*Summary of agency responses received*

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Table 1-1: Environmental Protection Agency (EPA) advice

ID	EPA Advice	Response	Where addressed (if relevant)
<b>Modification Report</b>			
<b>Environment Protection Licence</b>			
1	<p>The EPA understood that the proponent intended to exclude the BESS project from the land captured by an Environment Protection Licence (EPL 766) for the former Wallerawang Power Station operated by Greenspot Wallerawang Pty Ltd (Greenspot). As a standalone project at present, the BESS project is not included within Schedule 1 of the <i>Protection of the Environment Operations Act 1997</i> (the POEO Act) as such the EPA is not the appropriate regulatory authority (ARA) as defined by the Act. On this matter, the EPA has communicated this to the DPHI on several occasions and the EPA will not be assuming responsibility for regulating potential environmental impacts associated with the project including potential noise limit exceedances.</p>	Noted.	No further action
<b>Noise</b>			
2	<p>The EPA recommended that DPHI verify that the noise assessment conducted by GHD accurately characterised the proposed operational noise sources of the BESS and be based on real-time usage as opposed to relying on sources from existing databases. The assessment performed by GHD forecasts a reduction in operational noise associated with replacement of the battery manufacturers.</p>	<p>As described in Section 3.1 of the Submissions Report, the amendments to the project has been driven by advancements in technology and the introduction of more efficient BESS components. The Amendment Report is supported by an updated Noise Impact Assessment, which has made use of Sound Power Levels (SWL) based on manufacturer specifications where possible or measurements of similar noise sources from GHD's database.</p>	<p>Section 3.1 of the Submissions Report Wallerawang BESS Updated noise impact assessment (Appendix D of the Amendment Report)</p>
	<p>However, in the event all batteries are operating simultaneously at full capacity there is a potential for noise exceedances at Area 5 (RES.0844). The EPA recommended that DPHI require the proponent to install additional physical or operational mitigation measures.</p>	<p>As shown in Table 5.2 of the updated Noise Impact Assessment, the noise levels are predicted to be below the daytime, evening, and night-time noise limits at all receiver areas when the northern and southern layouts are operating both separately and concurrently.</p> <p>As a result, it was determined that physical mitigation measures are not required.</p>	<p>Updated Mitigation Measures (Appendix C of the Amendment Report)</p>

ID	EPA Advice	Response	Where addressed (if relevant)
		<p>Mitigation Measures NV7 and NV8 (Appendix C of the Amendment Report) provide appropriate measures to manage and minimise any potential exceedances of noise criteria. These measures are provided below:</p> <ul style="list-style-type: none"> <li>NV7: The OEMP will include measures and processes for managing noise resulting from the operation of the Project, including a process for managing complaints”</li> <li>NV8: If compliance with the Project specific noise criteria is unable to be achieved through detailed design, the facility will be operated with limitations on fan duty to ensure full compliance.</li> </ul> <p>Additionally, there is a contractual obligation in place for the EPC Contractor to validate noise from the facility via real world testing prior to achieving Commercial Operations Date (COD). This would demonstrate real world testing that the facility would be in compliance with the criteria formalised in the Conditions of Consent</p> <p><b>Based on the above measures and the measures detailed in the updated Mitigation Measures (Appendix C of the Amendment Report the Amended Project is expected to comply with the noise criteria stipulated in the Conditions of Consent.</b></p>	
<b>Water</b>			
3	The EPA advised that the proponent evaluate the necessity for supplementary water controls or infrastructure to ensure compliance with Section 120 of the POEO Act.	<p>An updated Water Quality Impact Assessment (NorBE) is included in Appendix G of the Amendment Report.</p> <p>This updated NorBE assessment concluded that the amended Project would meet the required NorBE criteria in relation to stormwater management as set by Water NSW, with the proposed stormwater mitigation measures involving:</p> <ul style="list-style-type: none"> <li>Grassed swales for all paved access roads to the proposed development</li> </ul>	Updated Water Quality Impact Assessment (Appendix G of the Amendment Report)

ID	EPA Advice	Response	Where addressed (if relevant)
		<ul style="list-style-type: none"> <li>• A treatment train of Humegard GPT and bioretention basin treating stormwater runoff from the BESS facility, switching yards and access roads.</li> </ul> <p>Additionally, as described in Section 4.2.9 of the Submission Report, the lithium-ion batteries proposed to be used in the BESS layout, would be hermetically sealed and would not be expected to release any contaminants to the environment.</p> <p>Section 4.1.4 of the Submissions Report describes the safety measures included within the design of the battery system, to prevent a fire event from happening.</p> <p>In the rare case of a battery fire, it is not possible to extinguish the fire with water or foam, which means that a fire is normally left to self-extinguish and there would therefore be no fire-fighting water entering receiving waters.</p> <p>Water may be used to cool adjacent areas (i.e. not directly on a fire) if deemed necessary. Runoff in this situation would not be expected to contain substantial levels of contaminants and would be treated through the operating water management treatment train (GPTs and bioretention basins or equivalent), as described in the updated Water Quality Impact Assessment (NorBE).</p> <p><b>Based on the above measures and the measures detailed in the updated Mitigation Measures (Appendix C of the Amendment Report the Amended Project is expected to comply with Section 120 of the POEO Act.</b></p>	<p>Section 4.2.9 of the Submissions Report</p> <p>Section 4.1.1 of the Submissions Report</p>

ID	EPA Advice	Response	Where addressed (if relevant)
<b>Submissions Report</b>			
<b>Environment Protection Licence</b>			
4	The proponent confirmed they intend to lease part of the Project Site from Greenspot. In May 2025, Lithgow City Council (LCC) determined a subdivision to create two registered lots which will become the leased premises for each respective stage of the development.	Noted	No further action
<b>Noise</b>			
5	<p>The proponent noted that the EPA is not the Appropriate Regulatory Authority (ARA) in relation to the project. The proponent also responded to the three <b>(3)</b> additional recommendations from the EPA regarding the noise assessment as follows:</p> <p><b>(1)</b> The operational noise sources from the equipment have been described in table 2.1 of the updated Noise Impact Assessment (NIA) and are mostly based on the manufacturers specifications, Australian Standard 60076:2009 or measurements of similar noise sources. The sound power levels are based on the Fluence™ Gridstack Pro 5000 Battery Enclosures on noise emission data from the supplier operating at 35 deg C operational mode.</p>	Noted	No further action
6	<b>(2)</b> The noise levels are predicted to be below the daytime, evening, and night-time noise limits at all receiver areas when the sections are operating both separately and concurrently.	Noted	No further action
7	<b>(3)</b> The revised BESS layout as assessed within Mod 1, removed the need for noise barriers to be utilised. The proponent has stated that this is due to the use of the alternate battery systems, which have lower sound power levels, along with the use of the natural terrain to minimise noise impacts. The proponent has stated that the NIA has shown that the noise barriers have minimal effect on reducing noise impacts at the identified residential areas. In	Noted	No further action

ID	EPA Advice	Response	Where addressed (if relevant)
	<p>addition, the proponent has stated that the reduced number of BESS components, due to enhanced efficiency enables the noise limits to be achieved and eliminates the need for noise barriers.</p>		
<b>Water</b>			
8	<p>Regarding potential impacts to the Coxs River due to fire water, the proponent has advised that each BESS enclosure contains multi-criteria smoke and gas (CO and H<sub>2</sub>) detectors. In the event of a runaway fire, it is not possible to extinguish the fire with water or foam, therefore the fire is normally left to self-extinguish. Water could be used to cool areas (i.e., not directly on fire) adjacent if deemed necessary, but this runoff would not contain substantial levels of contaminants.</p>	Described in line item 3 above.	<p>Updated Water Quality Impact Assessment (Appendix G of the Amendment Report)</p> <p>Section 4.2.9 of the Submissions Report</p> <p>Section 4.1.1 of the Submissions Report Water Group</p>
<b>Amendment Report</b>			
<b>Environment Protection Licence</b>			
9	<p>The proponent has stated that the project would <u>not</u> be classified as a scheduled activity under the POEO Act and therefore would not require an EPL. This corresponds with the understanding of the EPA, with the ARA likely being the responsibility of the DPHI.</p>	Noted	No further action
<b>Noise</b>			
10	<p>As you are aware the EPA has provided advice to the DPHI on this project through the original planning approval, the response to submissions, along with advice on Mod 1. The current proponent has made several changes to the proposed project which indicate a reduction in noise emissions due to the selection of alternate battery systems and mitigation equipment (e.g., silencers / fan duties) along with utilisation of topography.</p> <p>The EPA notes that as shown in Table 5-5, 'Comparison of potential operational noise between the amended project, the modified project and the approved project' p. 22 (NIA), that a</p>	Described in line item 2 above.	<p>Section 3.1 of the Submissions Report</p> <p>Wallerawang BESS Updated noise impact assessment (Appendix D of the Amendment Report)</p> <p>Updated Mitigation Measures (Appendix C of the Amendment Report)</p>

ID	EPA Advice	Response	Where addressed (if relevant)
	<p>reduction in the predicted LAeq 15min Noise level (dBA) is predicted with the GHD – Amended Project, utilising the FluenceTM Gridstack Pro 5000 system. While this reduction is a positive improvement to the overall project, the EPA has previously advised that DPHI should verify the noise assessment conducted by GHD to accurately characterise the proposed operational noise sources of the BESS and be based on real-time usage as opposed to relying on sources from existing databases. It is however noted within the submissions report that the sound power levels are based on the noise emission data from the equipment supplier.</p> <p>The EPA notes that for receiver address – 4 Millers Road, Lidsdale (RES.0844), the predicted noise levels are 35 LAeq 15min (dBA). The EPA advises that any inaccuracies in the predicted noise levels could result in a potential for noise exceedances, as communicated to DPHI in the EPA advice for Mod 1. In addition, the regulatory noise performance of the proposed project should not be dependent (reliant on low temp/low fan duty) on ambient temperature and the proponent will need to effectively manage the project to comply with the regulatory noise performance objectives under all ambient temperature and operational scenarios.</p> <p>Within the EPA response to the Mod 1 report, the EPA advised that noise barriers should be incorporated into the project, as their inclusion could assist in addressing any potential noise exceedances at surrounding residences including RES.0844. The EPA notes that the proponent has ruled out the need for noise barriers, despite the EPA advice.</p>		

ID	EPA Advice	Response	Where addressed (if relevant)
<b>Water</b>			
11	<p>The EPA provided advice on water management through the Mod 1 process emphasising a necessity for supplementary water controls or infrastructure to ensure compliance with Section 120 of the POEO Act. The proponent responded noting that the management approach towards potential impacts to waterways from fire water will rely on the use of fire detection systems, combined with an avoidance of utilising water or foam to respond to any potential fire. In addition, the proponent has stated that the project can be constructed and operated to have a neutral or beneficial effect (NorBE)) on water quality consistent with the provisions of the <i>State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011</i>.</p>	<p>Described in line item 3 above.</p>	<p>Updated Water Quality Impact Assessment (Appendix G of the Amendment Report)</p> <p>Section 4.2.9 of the Submissions Report</p> <p>Section 4.1.1 of the Submissions Report</p>

Table 1-2: DPHI Query

Further to the above information provided as a response to EPA advice, DPHI has requested additional information.

ID	DPHI	Response	Where addressed (if relevant)
1.	<p>Could you please advise whether adverse conditions with a F-class inversion + 2m/s wind was modelled, or whether it was just the F-class inversion?</p>	<p>The ISO algorithm use considers propagation under a well-developed moderate ground-based temperature inversion, such as commonly occurs on clear, calm nights. As part of this you can specify the downwind wind speed in m/s. The noise consultant has used 3 m/s, based on the second option in the <i>Noise Policy for Industry (EPA, 2017)</i> (NPfI) on meteorological effects where site specific meteorology can be assessed.</p> <p>The following provides more detail, and this is also included in Section 3.3. of the Updated Noise Impact Assessment (GHD, 2025).</p> <ul style="list-style-type: none"> <li>• The NPfI specifies the following two options to consider meteorological effects: <ul style="list-style-type: none"> <li>– Adopt the noise-enhancing meteorological conditions for all assessment periods for noise impact assessment purposes without an assessment of how often these conditions occur – a conservative approach that considers source-to-receiver wind vectors for all receivers and F class temperature inversions with wind speeds up to 2 m/s at night; or</li> <li>– Determine the significance of noise-enhancing conditions. This involves assessing the significance of temperature inversions (F and G class stability categories) for the night-time period and the significance of light winds up to and including 3 m/s for all assessment periods during stability categories other than E, F or G.</li> </ul> <p>Significance is based on a threshold of occurrence of 30% determined in accordance with the provisions in this policy. Where noise-enhancing meteorological conditions occur for less than 30% of the time, standard meteorological conditions may be adopted for the assessment.</p> </li> <li>• The NPfI recommends consideration of wind effects if they are “significant”. The NPfI defines “significant” as the presence of source-to-receiver wind speed (measured at 10 m above ground level) of 3 m/s or less, occurring for 30% of the time in any assessment period and season.</li> <li>• The Updated Impact Assessment (GHD, 2025) reviewed the significance of noise-enhancing conditions to determine if standard OR noise- enhancing meteorological conditions were warranted, i.e. “Determine the significance of noise-enhancing conditions”.</li> <li>• The assessment found noise-enhancing meteorological conditions were warranted, indicating that ‘F’ class temperature inversions are a feature of the area as they occur for more than 30% of the time during the winter and therefore are relevant to the assessment.</li> </ul>	<p>Section 3.3. of the Updated Noise Impact Assessment (GHD, 2025)</p> <p>(Appendix D of the Amendment Report)</p>

Table 1-3: Conservation Programs, Heritage and Regulation Group (CPHR) advice

	CPHR Advice	Response	Where addressed (if relevant)
1	<p>CPHR has reviewed the Amendment Report and Submissions Report against the project Biodiversity Development Assessment Report (BDAR) and is seeking clarification on the impact to native vegetation for the proposed project.</p> <p>The description of the project footprint in Table 3.1 of the Submissions Report indicates that there will be a decrease of approximately 2.6 hectares of impact to the BESS, switchyard and ancillary development in areas mapped as non-native vegetation. Table 3.1 also indicates that the area for the ephemeral creek, landscaping etc. will increase from 6 hectares to 10 hectares. It is not clear whether there will be an additional impact to native vegetation.</p>	<p>The area for the ephemeral landscaping has increased as a result of the decreased footprint of the BESS and associated infrastructure.</p> <p>The area for the ephemeral landscaping was assessed in the Biodiversity Development Assessment Report as consisting of planted <i>Pinus radiata</i>. The area of the Project Site subject to a Pine Plantation Deed (between Greenspot and Forestry Corporation of NSW). The pine plantation was harvested by Forestry Corporation of NSW in 2024.</p> <p>As such, there would be no additional impacts to native vegetation as a result of the increase in the ephemeral creek landscaping area.</p>	<p>Biodiversity Development Assessment Report (Arcadis, 2021)</p> <p>Environmental Impact Assessment (Arcadis, 2021)</p>
2	<p>The modified layout depicted in Figure 3.2 of the Amendment Report appears to intersect with vegetation consistent with Plant Community Type (PCT) 1299, as mapped in Figure 3-4 of the BDAR. CPHR is seeking clarification on whether there will be an increase in impact to native vegetation in the areas mapped in Figure 3.2 and described in Table 3.1.</p> <p>If the project increases impacts to biodiversity values, a BDAR may be required in accordance with section 7.17 of the <i>Biodiversity Conservation Act 2016</i>.</p>	<p>The locations of the transmission line structures remains unchanged from the locations proposed in the Modification Report. However, to allow for some flexibility and to accommodate disturbance during construction of the transmission line structures, the transmission line corridor was shifted south by 15 metres. This area has been previously assessed in the original Biodiversity Development Assessment Report (Arcadis, 2021).</p> <p>Figure 1 below compares the extent of vegetation zones for the EIS / Modification Report (red dotted line) and the Amendment Report (solid black line). As shown, the location of the transmission line structures remains unchanged from that shown in the Modification Report and the area of disturbance assessed in the Addendum BDAR, also remains unchanged.</p> <p><b>Impacts to PCT 1299, are consistent with what was assessed in the Addendum BDAR and as such, a subsequent BDAR is not required.</b></p>	<p>Addendum BDAR (Arcadis, 2025)</p> <p>Modification Report (Arcadis, 2025)</p>

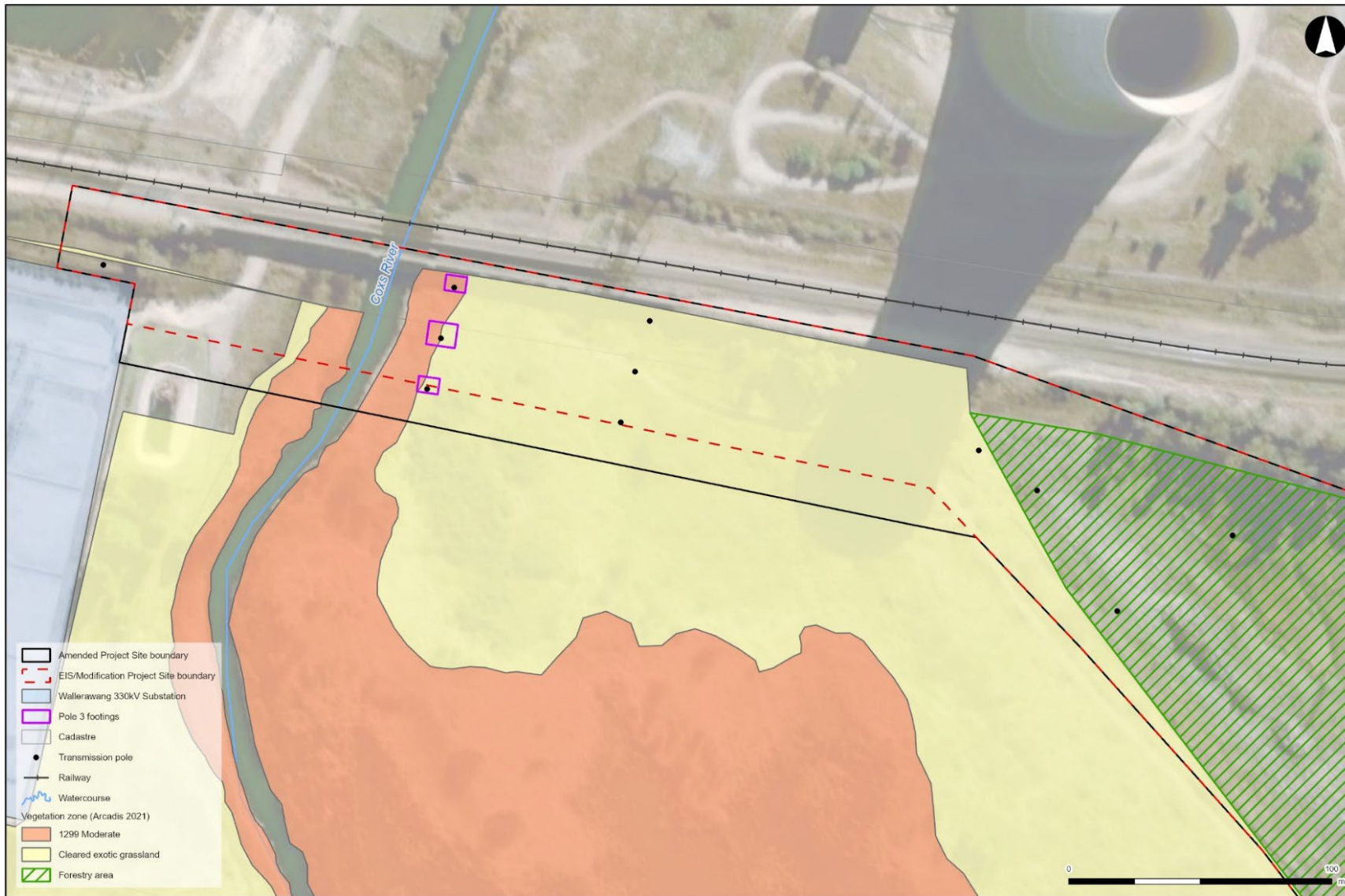


Figure 1: Comparison of the EIS/Modification site boundary (red dotted line) and Amendment Report site boundary in relation to the mapped vegetation zones

Table 1-4: Lithgow City Council advice

#	Lithgow City Council Advice	Response	Where addressed (if relevant)
1	<p>As per Council’s original response dated 11 December 2025, Council further has no objection to the proposed development subject to the following additional recommended conditions be placed on the consent should the application be approved:</p> <ul style="list-style-type: none"> <li>Subdivision- A Development Application is to be lodged to Council for the subdivision of the leased area.</li> </ul>	<p>Greenspot lodged a subdivision development application with Lithgow City Council on 10 February 2025. The subdivision was determined by Council on 15 May 2025.</p>	<p>No further action</p>
2	<ul style="list-style-type: none"> <li>The Voluntary Planning Agreement be amended to reflect the modification proposal.</li> </ul>	<p>This is currently being undertaken in discussion with the Applicant</p>	<p>No further action</p>
3	<p>Council’s previous recommended conditions, dated 7 March 2022, should further remain as conditions. This included:</p> <p>The mitigation measures for the key environmental issues identified within the Environmental Impact Statement are to be implemented with the additional plans submitted to Council for approval prior to commencement of work. These plans include:</p> <ul style="list-style-type: none"> <li>Construction and Operational Traffic Management Plan,</li> <li>Construction Noise and Vibration Management Plan,</li> <li>Erosion and Sediment Control Plan,</li> <li>Construction Flora and Fauna Management Plan,</li> <li>Landscape Plan, and</li> <li>Air Quality Management Plan.</li> </ul>	<p>Noted – these are post approval requirements</p>	<p>No further action</p>

#	Lithgow City Council Advice	Response	Where addressed (if relevant)
4	<p>Prior to commencing any construction works, the following provisions of the Environmental Planning and Assessment Act 1979 are to be complied with:</p> <ul style="list-style-type: none"> <li>a. a Construction Certificate is to be obtained in accordance with Section 81A(2)(a) of the Act, and</li> <li>b. a Principal Certifying Authority is to be appointed and Council is to be notified of the appointment in accordance with Section 81A(2)(b) of the Act and Form 7 of the Regulations, and</li> </ul> <p>Council is to be notified at least two days prior of the intention to commence building works, in accordance with Section 81A(2)(c) of the Act in Form 7 of Schedule 1 of the Regulations.</p>	Noted – these are post approval requirements	No further action

Table 1-5: Water NSW advice

#	Water NSW Advice	Response	Where addressed (if relevant)
1	<p>WaterNSW considers that the modification application should meet the requirements for a neutral or beneficial effect (NorBE) on water quality within the Sydney Drinking Water Catchment, as per the requirements placed on the original application.</p> <p>WaterNSW has reviewed the report and supporting information and notes the following:</p> <ul style="list-style-type: none"> <li>the applicant has undertaken further detailed design due to the availability of more efficient BESS equipment, resulting in increased BESS storage capacity, a reduction in the number of BESS components (battery containers) required, a reduced layout footprint from 9ha to 6.4ha, and therefore a condensed civil works scope.</li> </ul>	Noted	No further action required
2	<ul style="list-style-type: none"> <li>The proposed roads may incorporate grass lined swales, where deemed appropriate by the civil/drainage designer. Roads will be all weather and unsealed (i.e. crushed rock finish).</li> </ul>	Noted	No further action required
3	<ul style="list-style-type: none"> <li>The proposed stormwater measures now include two larger bioretention basins and GPTs or equivalent mitigation (one for each layout), to achieve NorBE. However, the Updated Water Quality Assessment prepared by Arcadis (dated 2/5/2025) does not specify the updated bioretention basin surface and filter areas in Table 2-7. Information contained in this table reflects the earlier modification layout which proposed three smaller bioretention basins.</li> </ul>	<p>The Updated Water Quality Assessment (dated 2/5/2025) has been corrected. The calculations were based on the two bioretention basins, however Table 2-7 was missed during these updates. This has now been corrected. See below.</p> <div data-bbox="1064 1077 1713 1284" style="border: 1px solid black; padding: 5px;"> <p>Bioretention-basins- (Figure-1-3)▣</p> <ul style="list-style-type: none"> <li>→ 880-m<sup>2</sup>-approximate-surface-area.▣</li> <li>→ 780-m<sup>2</sup>-total-filter-area▣               <ul style="list-style-type: none"> <li>→ Bioretention-Basin-1-=-330-m<sup>2</sup>▣</li> <li>→ Bioretention-Basin-2-=-450-m<sup>2</sup>▣</li> </ul> </li> <li>→ 0.3-m-extended-detention-depth▣</li> </ul> </div>	<p>Updated Water Quality Assessment (Revision 5) dated 04/07/2025 (Appendix G of the Amendment Report)</p>

#	Water NSW Advice	Response	Where addressed (if relevant)
4	<ul style="list-style-type: none"> <li>The updated Flood Impact Assessment prepared by HARC Services Pty Ltd (dated 5/5/2025) also indicates that the proposed Bioretention Basin 1 may fall within the 1% and 5% Annual Exceedance Probability flood level (AEP). As per WaterNSW's guideline, Using MUSIC in the Sydney Drinking Water Catchment (WaterNSW, 2023), it is preferred that stormwater measures be located above the 2% AEP to prevent impairment of longer-term treatment performance and avoid structural damage.</li> </ul>	This would be further considered during detailed design	No further action required
5	<ul style="list-style-type: none"> <li>Lithium-Ion Batteries (LIBs) are proposed as part of the BESS and may present fire, explosion and toxic gas release hazards. The Preliminary Hazard Assessment (updated in November 2024) determined that given the BESS location within a remote area with large separation distances to the nearest residential dwellings, no off-site impacts are expected from fire, explosions and release of vented gas from the battery cells. The overall risk was identified as being low (broadly acceptable) for all hazards identified.</li> </ul>	Noted	No further action required
6	<ul style="list-style-type: none"> <li>Given the scale of the project, the limited global experience with large capacity grid connected LIB BESSs, WaterNSW considers that further assessment of the potential hazards and risks associated with the LIB BESS (although proposed to be hermetically sealed) on water quality should be undertaken – particularly given the site's proximity to the Coxs River.</li> </ul>	<p>As described in Section 4.2.9 of the Submission Report, the Safety Data Sheet (SDS) for the proposed BESS model for the Amended Project states that batteries are hermetically sealed and designed to withstand temperatures and pressures encountered during normal use. Under normal conditions of use, there is no physical danger of ignition, explosion or chemical danger of hazardous materials leakage. The materials contained in this battery may only represent a hazard if the integrity of the battery is compromised or if the battery is mechanically, thermally or electrically abused.</p> <p>As also described in Section 4.2.4 of the Submission Report, there six layers of safety systems within the batteries:</p> <ol style="list-style-type: none"> <li>Battery Enclosure is certified under UL9540 and IEC 61439 standards</li> <li>The battery system is disconnected in case of excessive cell temperature, over- and under-voltage, and excessive current</li> </ol>	<p>Section 4.2.9 of the Submission Report Section 4.2.4 of the Submission Report</p> <p><b>References:</b> <i>Fluence (2024): Gridstack Pro 5000 Safety Systems Guide (30 August 2024) [Doc No. 00SQ-GUD-BSC-00- 002]</i> <i>Safety Data Sheet (SDS) [Doc No. 2023-A-39]</i></p>

#	Water NSW Advice	Response	Where addressed (if relevant)
		<p>during charge or discharge. This system is designed in accordance with UL1998</p> <ol style="list-style-type: none"> <li>3. The fire alarm systems results in shutting down battery system and complies with a SIL 2 under IEC 61508</li> <li>4. Site Energy Plan will be prepared to minimise further impacts to the first responders in the case of a fire or gases escaping</li> <li>5. A venting system is installed to minimise gas accumulation. This system is designed in accordance with NFPA 69 standards.</li> <li>6. The deflagration panels provide the sixth (mitigation) layer of safety. They act as a redundant system if the venting mechanism fails.</li> </ol> <p>These systems are designed to minimise the events that would impact the integrity of the batteries.</p> <p>In the rare case of a battery fire (if any of the above systems fail), it is not possible to extinguish the fire with water or foam, which means that a fire is normally left to self-extinguish and there would therefore be no fire-fighting water entering receiving waters.</p> <p>Water may be used to cool adjacent areas (i.e. not directly on a fire) if deemed necessary. Runoff in this situation would not be expected to contain substantial levels of contaminants and would be treated through the operating water management treatment train (GPTs and bioretention basins or equivalent), as described in the updated Water Quality Impact Assessment (NorBE).</p> <p><b>Based on the above measures and the measures detailed in the updated Mitigation Measures, including the preparation of the Stormwater Management Plan (Appendix C of the Amendment Report) the risk of contamination from the batteries impacting the Coz Reiver is considered low.</b></p>	<p><i>Fluence (2024): First Responder Safety Guide (22 May 2024) [Doc No. 00SQ-INS-FLN-90-001]</i></p>
7	WaterNSW requests that the following plans be prepared in consultation with WaterNSW for long-term sustainable water quality management:	Noted – these are post approval requirements	No further action required at this stage

#	Water NSW Advice	Response	Where addressed (if relevant)
	<ul style="list-style-type: none"> <li>• a final Stormwater Management Plan including:               <ul style="list-style-type: none"> <li>- details of how potential water quality impacts will be avoided and/or minimised through project design, and route and site selections for the hardstand areas (including that required during the construction phase)</li> <li>- detailed design plans showing the site layout including stormwater quality treatment measures to treat stormwater runoff from the proposed impervious areas such as the BESS, building roofs, internal access tracks and hardstand areas, and measures required for watercourse crossings (both temporary and permanent). This should include detailed cross sections and placement of stormwater measures outside of the 2% AEP, and</li> <li>- updated stormwater quality modelling, to be refined as part of detailed design, showing a comparison of pre- and post-development scenarios on water quality parameters of key concern (Total Suspended Solids, Total Phosphorus and Total Nitrogen). The modelling should also be consistent with the EIS and Modification Amendment and Submissions Report and supporting documentation, particularly for the effective impervious area for access tracks and BESS infrastructure. WaterNSW will require an electronic copy of the stormwater quality model</li> </ul> </li> <li>• management and maintenance of stormwater management measures as part of an Operational Environmental Management Plan (OEMP), and</li> <li>• a Conceptual Soil and Water Management Plan(s) for the construction, operational and decommissioning phases of the project.</li> </ul>		

Table 1-6: Heritage NSW advice

#	Heritage NSW Advice	Response	Where addressed (if relevant)
<b>Response to Submissions</b>			
1	<p>Our previous advice on the Modification Report dated 13 December 2024 provided provisional agreement with the proposed management measures and recommendations (Sections 7 and 8 of the ACHAR), however, we requested additional information and clarification in relation to the Aboriginal community consultation, the analysis and discussion presented in the Archaeological Report and requests relating to the Aboriginal Heritage Information Management System (AHIMS) search and site card updates (our reference: HMS 8108). The responses provided in the Submissions Report, along with the additional information provided in the Updated Aboriginal Cultural Heritage Assessment Report (ACHAR; Appendix C of the Submissions Report) have adequately addressed the Aboriginal cultural heritage matters previously raised by Heritage NSW.</p>	Noted.	No further action required
<b>Amendment Report</b>			
2	<p>It is understood that since the exhibition of the Modification Report the Applicant has undertaken further detailed design resulting in a number of amendments including a reduction in the BESS layout footprint and a shift in the transmission line boundary placing it 15 meters south of its previously approved alignment to provide more flexibility for transmission line pole location and associated construction. Additional assessment and consultation with project registered Aboriginal Parties (RAPs) has been undertaken to assess the impacts of the proposed amendments and has been presented in the Addendum ACHAR (NGH, 2025) provided as Appendix E of the Amendment Report.</p> <p>The Addendum ACAHR outlines that the test excavations completed as part of the Modification assessment sufficiently characterised the overall low density of Wallerawang BESS AFT+ PAD 01 (AHIMS#45-1-2844) and the low potential for the associated landforms more broadly. Much of the central area initially identified as PAD, for example, was determined to retain negligible archaeological potential due to the presence of standing water and boggy conditions. The proposed extension to the transmission line corridor between 10 and 23m south of the test pits programme area is considered in the Addendum ACAHR to be reasonable based on the nature of the terrain and the extrapolation of the exiting test excavation results across the same landforms. The Addendum ACHAR concludes that the proposed amendments do not introduce any additional impacts to Aboriginal heritage items beyond those already addressed in the Modification ACHAR as the area of construction corridor and the construction techniques are the same as previously assessed. Heritage NSW agrees with the proposed management recommendations (Section 8 of the updated ACHAR and Section 8 of the Addendum ACHAR) and has no further comments on the proposal at this time.</p>	Noted.	No further action required

Table 1-7: DCCEEW Water Group advice

#	DCCEEW Advice	Response	Where addressed (if relevant)
1	The RTS has been reviewed by NSW DCCEEW Water Group and NSW DCCEEW Water Group has no further comments.	Noted.	No further action required

Table 1-8: FRNSW advice

	FRNSW Advice	Response	Where addressed (if relevant)
1	<p>FRNSW refers to our previous letter dated 12 December 2024, Advice on Amendment Report (D24/145628), for <b>WALLERAWANG BATTERY STORAGE – CASTLEREAGH HIGHWAY, WALLERAWANG (SSD-14540514-MOD-1)</b>.</p> <p>All recommendations made in this letter remain applicable to this project. FRNSW submit no additional comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation at this stage.</p>	Noted.	No further action required

Table 1-9: Rural Fire Service advice

#	Rural Fire Service Advice	Response	Where addressed (if relevant)
1	<p>It is noted that the Applicant has not yet submitted a revised bush fire assessment report for the proposal, as required in the previous NSW RFS correspondence dated 13 February 2025.</p> <p>Given the changes to the site layout, which affect the positioning of the proposed Asset Protection Zones as advised by the bush fire consultant, an updated report is considered necessary.</p> <p>Notwithstanding, the NSW RFS does not object to the proposed amendments under MOD 1, subject to compliance with the previous correspondence dated 13 February 2025.</p>	The Bushfire Assessment Report has been updated to consider the new layout	Updated Bushfire Assessment (Bushfire Consulting, July 2025) (Appendix J of the Amendment Report)

Table 1-10: DPHI Hazard advice

#	DPHI Hazard Advice	Response	Where addressed (if relevant)
1	<p><b>Scope Consistency</b></p> <p>The amended modification increases the BESS discharge and storage capacity and specifies battery numbers: 180 for the northern BESS and 240 for the southern. This equates to 880 MWh and 1,360 MWh respectively, or a total of 2,240 MWh based on nominal storage capacities. However, this differs from the total capacity stated in the proposal.</p> <p>The team acknowledges potential differences due to round-trip efficiency and nominal grid connection limits but requested clarification of the maximum proposed discharge and storage capacity for BESS in the amended modification (see RFI 1).</p> <p><b>Request for more information</b></p> <p>Noting the number of batteries described in the Preliminary Hazard analysis, please clarify the proposed energy storage and discharge capacity of the batteries for amended modification.</p>	<p>Taking into the system losses, oversizing of capacity allows for a warranted degradation curve and that functional performance is measured via revenue and check meters located at the 330kV Point of Connection.</p> <p>The sizing of the system is also governed and permitted by the AEMO and Transgrid approved Generator Performance Standards (GPS). Nominal energy is different to actual energy capacity – whereby inconsistency in cell performance is remedied via contingency in design.</p> <p>The applicant confirms that the following energy storage and discharge capacity is proposed for the amended Project.</p> <ul style="list-style-type: none"> <li>• a northern layout of 300 MW (775 MWh) and 2.6 hours capacity at maximum discharge rate</li> <li>• a southern layout of 300 MW (1,200 MWh) and four hours capacity at maximum discharge rate.</li> </ul>	No further action required
2	<p><b>Level of Analysis</b></p> <p>The Applicant updated the preliminary hazard Analysis (PHA Rev 4) BESS. The PHA is in general accordance with the Department’s Hazardous Industry Planning Advisory Paper No. 6 (HIPAP 6) and the Multi-Level Risk Assessment (MLRA) framework. The assessment involved a Level 1 qualitative risk assessment.</p> <p>The team is satisfied with the Level 1 qualitative risk assessment, noting the separation to the nearest resident is 550 metres from the site.</p>	Noted	No further action required

#	DPHI Hazard Advice	Response	Where addressed (if relevant)
	<p><b>Hazardous Events</b></p> <p>The Preliminary Hazard Analysis (PHA Rev 4) has identified thermal runaway and the resulting radiant heat and toxic products from thermal decomposition as key hazards associated with the operation of the BESS.</p> <p>Radiant heat levels were evaluated using fire modelling, which was based on radiant heat flux calculations employing geometric view factor methods between a planar flame and a differential receptor element. A flame surface temperature of 1,000 °C was assumed, with full ignition of the front face or side of the battery</p> <p>Toxic products were evaluated using dispersion modelling for carbon monoxide, benzene, and hydrogen fluoride. The modelling found that the impacts of these potential toxic products would be contained within the site boundaries.</p> <p>The team is satisfied that the radiant heat and potential toxic products from thermal decomposition will not affect surround land use, noting the separation to the nearest resident is 550 metres from the site.</p>	Noted	No further action required
	<p><b>Battery Separation</b></p> <p>The PHA Rev 4 used the Fluence Gridstack Pro 5000 battery to establish separation distances. Large-scale fire testing identified a front-facing separation of 3.05 metres, with side-to-side and back-to-back distances of 1.5 metres and 0.51 metres respectively.</p> <p>Radiant heat effects were found to be contained within the site boundaries.</p> <p>The team is satisfied that the large-scale fire testing is appropriate to inform separation distances and minimise fire propagation risk.</p>	Noted	No further action required

#	DPHI Hazard Advice	Response	Where addressed (if relevant)
1	<p><b>Area Allocated to Batteries</b></p> <p>The Applicant has provided layouts in Figures 2.6, 5.1, and 5.2 of PHA Rev 4, showing 180 batteries in the north BESS and 240 in the south BES.</p> <p>The team is satisfied that sufficient area has been allocated to allow for battery separation and minimise the risk of fire propagation.</p>	Noted	No further action required

Table 1-11: Transgrid advice

#	Transgrid Advice	Response	Where addressed (if relevant)
1	<p>We can advise this is a customer project and the Transgrid Group will continue liaising with the proponent directly regarding the grid connection. The applicant will need to work with Transgrid to establish a suitable access pathway as part of this project for the connection works within Transgrid’s Wallerawang Substation.</p> <p>It is Transgrid Group’s expectation that the proponent will be responsible to procure all Statutory approvals and property related tenure arrangements as part of this project and consult with Transgrid to understand these requirements.</p> <p>The proponent will also need to advise how they’ll achieve the requirements of Transgrid’s Easement Guidelines and demonstrate that Transgrid is able to achieve maintenance activities around its existing structures safely. For preliminary advice on Transgrid’s Easement Guidelines, please refer to the following hyperlink:  <a href="https://www.transgrid.com.au/safety/community-safety/">https://www.transgrid.com.au/safety/community-safety/</a></p>	<p>The original Project Approval (August 2022) and subsequent Amendment Report (August 2025) always took into account the connection to the Transgrid substation.</p> <p>In response to further consultation with Transgrid, the Amendment Report has been updated to improve clarity in relation to the connection and its inclusion in the Project Approval.</p>	Various sections and updated Project description within the Amendment Report