

Amendment Report

*Deniliquin East BESS –SSD–
61612229*

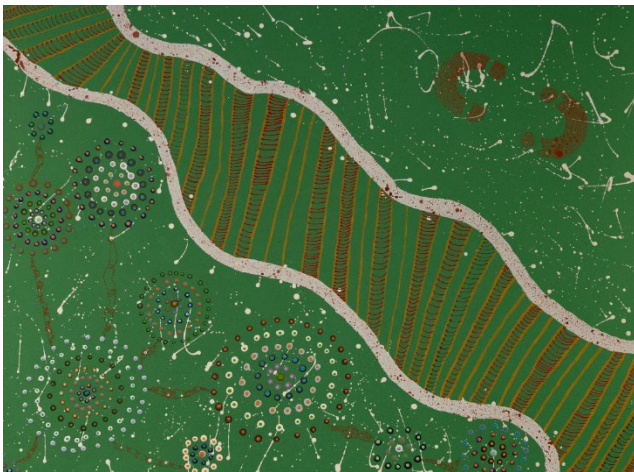
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Report Number	V2

Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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1 Introduction

This Amendment Report (**Report**) has been prepared on behalf of BESS Arctic Pty Ltd c/o Gransolar Development Australia (the **Applicant**) to amend the scope of the State Significant Development Application (**SSDA**) (**SSD-61612229**), known as the Deniliquin East Battery Energy Storage System (**Deniliquin East BESS; the project**) and located at 21356 Riverina Highway, Deniliquin (**the site**). BESS Arctic Pty Ltd is the Special Purpose Vehicle (**SPV**) owned by the Applicant for the purpose of the development of the project at the site.

The original SSDA was formally lodged with the Department of Planning, Industry and Infrastructure (**DPHI**) in May 2025 and in accordance with the *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**).

In March 2026, DPHI issued a Request for Further Information (**RFI**) following the Response to Submissions (**RTS**) report submitted on 12th February 2026.

Under the *Environmental Planning & Assessment Regulation 2021* (**the Regulations**), the Applicant for an SSD project may, with the agreement of the consent authority, amend or vary an application at any time before it is determined.

According to the SSD Guidelines, Amendments to an SSDA are required if the Applicant wants to change what it is seeking consent for and needs to amend the project description in the relevant environmental impact statement (**EIS**). These amendments may be necessary to improve the design of the project, respond to issues raised by the community in public submissions or further mitigate the impacts of the project. Refinements are separate from amendments, being changes that fit within the limits set by the project description and do not change what the Applicant is seeking consent for or require an amendment to the DA for the project.

During consultation with DPHI during the RFI phase, it was considered that an intersection upgrade to the access road for the Deniliquin TransGrid Substation should be included in the proposed development. The intersection upgrade fits within the development footprint as included in the original SSDA. Whilst this change is within the originally proposed development footprint and is also assessed and approved under the Deniliquin BESS project (SSD-72258210), the change is considered an amendment to the project and not a refinement.

As such, this Report seeks to amend the original project description pursuant to s37 of the Regulations.

2 Strategic Context

The Project continues to respond to international, national, state and regional needs to deliver reliable, low-carbon and sustainable energy into the electricity grid.

International Need

In December 2015, Australia became a signatory to the United Nations Paris Agreement on climate change. The main objectives of the Paris Agreement are to:

- Limit the increase in global temperatures to well below two degrees and pursue efforts to limit the rise to 1.5 degrees.
- Achieve net-zero emissions, globally, by the second half of the century.
- Differentiate expectations for developed nations, including Australia, that they will reduce their emissions sooner than developing nations.

The Australian Government has committed to reducing greenhouse gas emissions by 26–28% on 2005 levels by 2030. The Project would contribute to meeting the nation's international commitments to reduce greenhouse gas emissions and to Australia's effort to meet the Paris Agreement by leveraging renewable energy resources from the nearby SWREZ, increasing storage and release of renewable energy.

National Need

The Renewable Energy Target (**RET**) is an Australian Government scheme designed to reduce emissions of greenhouse gases (**GHG**) in the electricity generation sector and encourage additional renewable energy generation. The Capacity Investment Scheme (**CIS**) incentivises the development of renewable energy power, including dispatchable power, such as BESS. The scheme has an annual target of 33,000 gigawatt hours (**GWh**) until the scheme ends in 2030.

The Project would contribute to meeting the RET targets and firm alternative power generation sources, resulting in reduced GHG emissions, contributing to meeting the Paris Agreement and aiding the transition towards cleaner electricity generation.

State Need

With the objective of delivering cheaper, cleaner, and more reliable electricity to support future growth across the state, the NSW government established the following policies:

- Renewable Energy Planning Framework 2024
- NSW Transmission Infrastructure Strategy (DPE, 2018).
- NSW Electricity Strategy (DPIE, 2019).
- NSW Electricity Infrastructure Roadmap (DPIE, 2020).
- NSW Climate Change (Net Zero Future) Act 2023.
- Energy Legislation Amendment (Prioritising Renewable Energy) Bill 2026.

The project will continue to align itself towards these objectives and support the State goals for a renewable energy transition.

Regional Need

The *Riverina Murray Regional Plan 2041* (**RMRP**) aims to facilitate sustainable growth in the NSW Riverina Region by adapting to challenges posed by climate change, the housing market, and the economy.

Objective 13 of the RMRP is to support the State's transition to net zero by 2050 and deliver the SWREZ. In line with National and NSW objectives for cheaper, cleaner, and more reliable energy, and Australia's international commitments, the SWREZ is one of at least five REZs to be rolled out across NSW and is expected to attract

\$2.8 billion in private investment to the region by 2030. As set out in the *Electricity Infrastructure Investment Act 2020*, the SWREZ has an intended network capacity of 2.5 GW.

The Project would support Objective 13 of the RMRP by leveraging its strategic position near the SWREZ network capacity and enhancing the dispatchable storage capacity needed to achieve net zero emissions by 2050.

Developed in 2024, the *Edward River Community Strategic Plan: Towards 2035 (ERCSP)* outlines Edward River Council's (**Council**) development and community vision for the Region, including the township of Deniliquin. The ERCSP outlines five themes that Council would work towards achieving by 2030 through plans and strategies including, but not limited to:

- Climate Change response.
- Waste Management.
- Workforce Strategy.

The Project would align with Theme 2: *Natural Environments* of the ERCSP by introducing dispatchable storage energy into the electrical grid and reducing the reliance on fossil fuels. The Project would also align with Theme 4: *Economy: Strong, diverse and sustainable* by creating work opportunities throughout the life of the Project and introducing visitors to the region during construction. Overall, the Project would support the strategies outlined in the ERCSP.

Released in late 2025, Council released its *Renewable Energy Position Statements* aimed to support and inform the conditions of consent that DPHI may impose upon determination. The Applicant has reviewed these in close consultation with Council and has closely aligned the project to satisfy Council's positions where applicable.

3 Description of Amendments

3.1 The Project

The Project has not materially changed and is considered substantially the same development as originally submitted. However, intersection road works providing upgraded access to the TransGrid substation have been added within the existing development footprint and clarified within the development description.

The Project elements remain as:

- Site preparation works including tree removal and earthworks. This will include all pre-construction works, such as fencing, surveys, safety marking, and intersection works required for the movement of OSOM vehicles at:
 - Cobb Highway / Hardinge Street, Deniliquin
 - Hardinge Street / Charlotte Street, Deniliquin
 - Charlotte Street / Davidson Street, Deniliquin
- Construction, installation and operation of a BESS including:
 - Containerised lithium-ion battery modules with approximately 100MW/200MWh nominal battery capacity and 120MW/240MWh of total installed cell capacity.
 - Power conversion units, which convert the DC power from the battery modules to 33kV AC.
 - On-site 33/132 kV substation, including power transformer and oil containment system.
 - A 33kV switch-room.
 - Control room.
 - Maintenance container.
 - A 132 kV overhead transmission line connecting with the Deniliquin Substation.
- Permanent supporting infrastructure including:
 - Upgraded site vehicle access road and culvert to provide access to Riverina Highway.
 - Internal access roads and car parking for maintenance vehicles.
 - Three 20,000-litre water tanks.
 - Security fencing and CCTV security system.
 - Acoustic barrier.
 - Landscape screening.
 - Lightning mast.
- Temporary construction facilities including:
 - Laydown area.
 - Construction materials storage area.
- Site preparation, cabling connection and connection bay. It should be noted that the location of the final connection bay has not yet been confirmed and will be finalised in consultation with TransGrid post approval during detailed design.

The additional project elements, described in this Amendment Report, which are proposed to be incorporated into the SSDA, entail the following:

- Works associated with the TransGrid substation compound, including:

- Expansion of the existing driveway to accommodate the entrance and exit of heavy vehicles of up to 19m in length.

As identified in the EIS submitted with the SSDA, the proposed BESS and supporting infrastructure are to be constructed in a single stage. In response to consultation with agencies and Council, it is clarified that site preparation works and minor road works will be completed prior to commencing construction of the central elements of the Project.

Site preparation works will entail the following:

- Artefact surveys and/or salvage
- Overhead line safety marking
- Building and road dilapidation surveys
- Geotechnical drilling, excavation or salvage
- Establishing temporary site office (in locations meeting the criteria identified in the conditions of the future consent)
- Installation of environmental impact mitigation measures, fencing and enabling works

Minor road upgrades involve:

- Provide an AUL treatment on the Riverina Highway to Lo 11 DP8566212
- Temporary removal of traffic islands, installation of kerbing and traffic mount signs and re-instatement of signage and traffic islands at:
 - Cobb Highway / Hardinge Street
 - Hardinge Street / Charlotte Street
 - Charlotte Street / Davidson Street

For clarity, the minor road upgrades **exclude** the following, which will instead be considered ancillary to the central elements of the Project and part of the main construction schedule:

- The new culvert crossing of the Moulamein Channel.
- Road treatment works or driveway upgrades associated with the site access to the TransGrid's substation. Site access upgrades to TransGrid's substation will be undertaken concurrently with the construction of the central elements of the project and will be completed prior to works within the TransGrid substation compound commencing.

3.2 Description of the Project Amendment

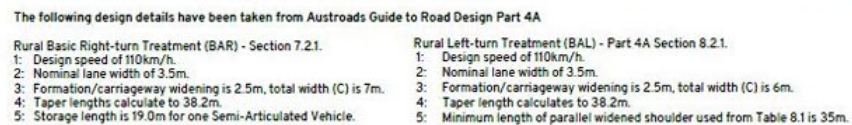
This section of the report describes the proposed amendment and provides a comparative analysis of the original development and amended proposal. It also includes an updated, detailed description of the various components of the proposal, including the proposed amendments.

The Project amendment is submitted pursuant to the provisions of Section 37 of the Regulations.

The amended Project seeks works within what was already defined as the development site. Importantly, the amendment works are within what was defined at the time as 'Project Area' for which consent is sought, and which is the primary part of the SSDA land. As such, these works and the development footprint had already been assessed for environmental and traffic impacts within the original EIS.

The proposed upgrades have already been approved as part of the adjacent Deniliquin BESS project (**SSD-72258210**) and assessed accordingly. For completion and to remove uncertainties, these works are now included as part of the Project (**SSD-61612229**).

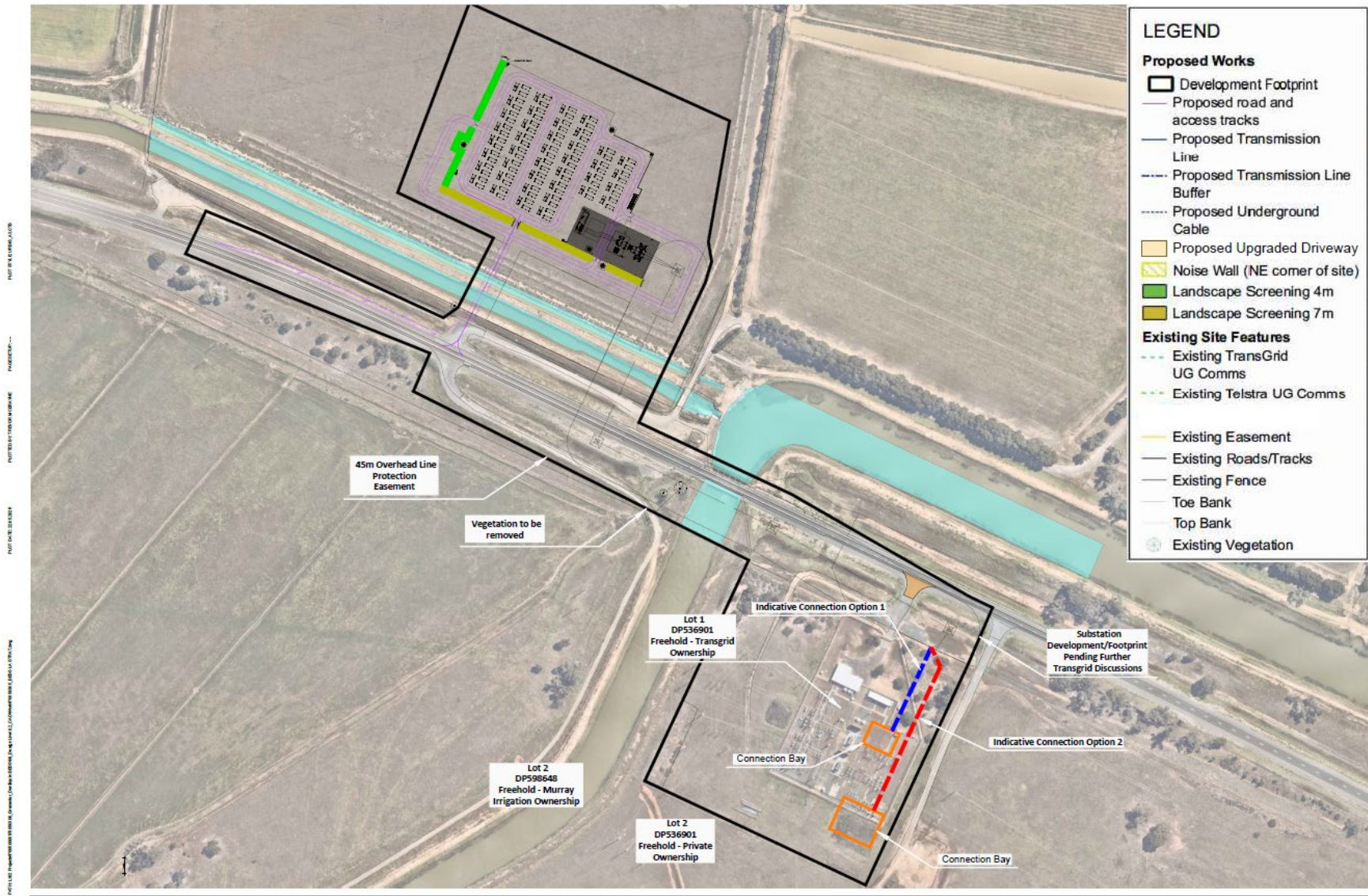
Only Substation Access upgrades and road treatments will be undertaken as part of the Deniliquin East BESS project SSD-6162229



DRAWN: SE
DATE: 08/04/2025
DWG NO: 987 S01D
SCALE at A3: 1:750



Figure 2 Deniliquin East BESS – Amended Development Layout



For the avoidance of doubt, the following Table 1 includes a comparison of the assessed project area originally in the EIS and in this Amendment Report.

Table 1 Development Footprint – Comparison of areas between the original project and amendments

Element	Original Development (hectares)	Amended Development (hectares)
Development Footprint Area	10.7	No Change
Mapped RUI	7.7	No Change
Developed land mapped RUI	3.53	No Change
Mapped SP2 land	3.0	No Change
Native vegetation	0.72	No Change
Non-native vegetation	4.25	No Change
Cleared land	4	No Change
Native vegetation to be cleared as part of the project	0.03	No Change

The project, as amended, does not seek an increase to its originally proposed development footprint, nor includes any additional part of the wider site area for its operation beyond what was originally assessed.

4 Statutory Context

4.1 Statutory Requirements

Table 1 categorises and summarises the relevant requirements in accordance with the DPHI *State Significant Development Guidelines*.

Table 2 Identification of Statutory Requirements for the Project

Statutory Relevance	Action
Power to grant land use classification and consent authority	Schedule 1, Section 20 of the Planning Systems SEPP, identifies that development for 'electricity generating works', is to be considered State significant if the Project: (a) <i>has an estimated development cost of more than \$30 million, or</i> (b) <i>has an estimated development cost of more than \$10 million and is located in an environmentally sensitive area.</i> The Project, as amended, is still development for the purpose of electricity generating works using solar power and has an estimated development cost of approximately \$118,000,000 and therefore exceeds the \$30 million threshold. The Project is State-significant development under Part 4 Division 4.7 of the EP&A Act 1979. The consent authority will be the NSW Independent Planning Commission (IPC), as more than 50 unique submissions were received in response to the public exhibition of the SSDA.
Permissibility	The broader Project area is zoned <i>RUI – Primary Production</i> and <i>SP2 – Infrastructure</i> under the newly consolidated <i>Edward River Local Environmental Plan 2013 (ERLEP)</i>. Previously, electricity-generating works were permitted with consent in the <i>RUI</i> and <i>SP2</i> zones under the <i>Deniliquin LEP</i>. The <i>ERLEP</i> changes to the zoning permissibility made this use of land prohibited in <i>RUI</i> and <i>SP2</i>. Notwithstanding, section 2.6(1)(a) of the Planning Systems SEPP identifies that electricity generating works are permitted with consent within any land in prescribed zones under the T&I SEPP, which states in Part 2.3 Development Controls, division 4, section 2.35 that: <i>Electricity generating works means a building or place used for the following purposes –</i> <i>Making or generating electricity,</i> <i>Electricity storage</i> The T&I SEPP, states in section 2.36: <i>Development for the purpose of electricity generating works may be carried out by any person with consent on the following land –</i>

- (a) *In the case of electricity generating works comprising a building or place used for the purpose of making or generating electricity using waves, tides, or aquatic thermal as the relevant fuel source-on any land,*
- (b) *In any other case – any land in a prescribed non-residential zone.*

The RU1 and SP2 zones are prescribed non-residential zones. Therefore, the Project, as amended, is still permissible with consent under section 2.36 (i) of the T&I SEPP.

Commonwealth Legislation

EPBC Act

Under the EPBC Act any action (which includes a development, the Project or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (**MNES**) (including nationally threatened ecological communities and species and listed migratory species), must be referred to the Commonwealth Minister for the Environment. If an action is considered likely to have significant impact on any MNES, it is declared a “Controlled Action” for which formal Commonwealth approval is required.

As outlined in the BDAR (Appendix F) several MNES were assessed. After careful assessment, no threatened flora or fauna species were identified as occurring on the Site. The BDAR concluded that the Project will not result in a significant impact on any threatened species.

A protected matters search within 10km of the Site was undertaken to identify potential EPBC Act listed TECs that may occur on-site and wider area. The following TECs were identified for consideration:

- Natural Grasslands of the Murray Valley Plains.

PCT 44, which is the only PCT impacted by the Project, is associated with the abovementioned EPBC-listed TECs

As such, consideration is provided to the EPBC listing advice to determine if assessed vegetation meets the relevant criteria. No assessed vegetation meets the key diagnostic characteristics required for the EPBC listing of Natural Grasslands of the Murray Valley Plains TEC.

No other EPBC-listed MNES were identified as potentially occurring on the Site.

The Project, as amended, does not include further removal to native vegetation.

Accordingly, a referral to the Commonwealth Department of Climate Change, Energy, the Environment and Water is not required for the Project.

Native Title Act 1993 (Cth)

The Native Title Act 1993 recognises and protects native title rights to the Aboriginal and Torres Islander people of Australia. It allows a native title determination application to be made for land and/or waters where native title has not been previously and validly extinguished. A native title grants rights to certain uses and negotiations over the land.

There are currently no native title determinations over the Site.

A search of the National Native Title Tribunal (**NNTT**) registers and databases was undertaken on 28 February 2024. The search identified no pending Native Title claims or Native Title registrations for the subject area. The NNTT was also

contacted by email on 28 February 2024 to request a formal search of the NNTT Register. A reply was received on 28 February 2024 indicating that although there is one Native Title claim (VC2021/001) which intersects with the subject area, this claim was not accepted for registration. Therefore, there are no Native Title matters overlapping with the subject area.

Other Approvals – New South Wales

Conveyancing Act 1919

The Project will require the execution of a lease by the owners of Lot 11 on DP 856212. A lease of the land for the Project is treated as a lease of premises, regardless of the duration of the lease.

Consistent Approvals

Roads Act 1993

The Project will require consent from TfNSW as the road authority under Section 138 for works undertaken on Riverina Highway including the bridges and the extended development footprint by this Amendment Report.

Section 4.42(1)(f) of the EP&A Act 1979, provides that consent under section 138 cannot be refused if it is necessary for carrying out SSD that is authorised by a development consent under Division 4.7 and the road works are substantially consistent with the consent for the SSD.

Protection of the Environment Operations Act 1997 (POEO Act)

As per Schedule 1 of the POEO Act, a licence is required for the activities listed within the schedule. Electricity generation – general electricity works is listed in section 17, meaning the generation of electricity by means of electricity plant that, wherever situated, is based on, or uses, any energy source other than wind power or solar power. A BESS does not participate in the generation of electricity, rather the Project will only store and discharge electricity to the grid.

As such, no activities identified in Schedule 1 are proposed as part of this application. An Environment Protection Licence is not required.

Approvals not required as part of the SSD Application

Water Management Act 2000

Pursuant Section 4.41 of the E&PA Act, the Project will not require a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91.

Fisheries Management Act 1994

Pursuant Section 4.41 of the EP&A Act, the Project will not require a permit under section 201, 205 or 219 of the FM Act to block fish passage, dredge or carry out reclamation work on water land.

Heritage Act 1977

Pursuant Section 4.41 of the EP&A Act, the Project will not require an approval under Part 4, or an excavation permit under section 139.

National Parks and Wildlife Act 1974

Pursuant Section 4.41 of the EP&A Act, the Project will not require an Aboriginal heritage impact permit under section 90.

Rural Fires Act 1997

Pursuant Section 4.41 of the EP&A Act, the Project will not require a bush fire safety authority under section 100B.

4.2 Pre-Conditions

Table 2 outlines the pre-conditions to exercising the power to grant approval that are relevant to the Project and the section where these matters are addressed within the EIS.

Table 3 Pre-Conditions

Statutory Reference	Pre-condition	Relevance
Environmental Planning and Assessment Regulation 2021	An EIS must be prepared in accordance with the SEARs issued for the Project, and contain the relevant information identified in sections 190 and 192 of the EP&A Reg. 2021. An Amendment Report must be prepared pursuant to section 37 of the EP&A Reg 2021, after an application has been submitted to the consent authority. If the amendment will result in a change to the development, the application must contain details of the change, including the name, number and date of any plans that have changed, to enable the consent authority to compare the development with the development originally proposed.	The EIS addresses the SEARs issued by the Secretary pursuant to section 175 and contains the detailed information identified in section 190 and section 192 of the Regulations. Specifically, it includes a statement prepared by a Registered Environmental Assessment Practitioner. This Amendment Report has been prepared in accordance with s37 of the Regulations and includes details of the proposed changes.
R&H SEPP – section 4.6(1)	A consent authority must be satisfied that the land is suitable in its contaminated state – or will be suitable, after remediation – for the purpose for which the development is proposed to be carried out.	The Project involves a change of use from agricultural activities to electricity generation works (renewable). An assessment of land use site history has been concluded, noting that the site has been used for grazing for the last 30 years and there is no indication of land use activities, land disturbance or practices that would potentially result in contaminated locations or activities. A Preliminary Site Investigation (PSI) was prepared by Premise and submitted during the RTS phase, concluding that there are no contaminated materials present on the site.
ERLEP 2013	(3) Before granting development consent for earthworks (or for	The Project, as amended, includes minor earthworks for

Clause 6.1 (3) (Earthworks)	development involving ancillary earthworks), the consent authority must consider the following matters— (a) the likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development, (b) the effect of the development on the likely future use or redevelopment of the land, (c) the quality of the fill or the soil to be excavated, or both, (d) the effect of the development on the existing and likely amenity of adjoining properties, (e) the source of any fill material and the destination of any excavated material, (f) the likelihood of disturbing relics, (g) the proximity to, and potential for adverse impacts on, any waterway, drinking water catchment or environmentally sensitive area, (h) any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.	site preparation The impacts of the earthworks have been devised with consideration of the environment, managing stormwater and minimising the likelihood of disturbing relics. The final extent of earthworks involves a total area of approximately 4 hectares, including adjacent road works. The total earthworks required for the BESS area on Lot 11 DP856212 is 3.53 hectares. Mitigation measures to avoid and minimise erosion are outlined in the EIS. There will be limited fill requirements for the project, most likely only associated with the deceleration lane along the Riverina Highway. Although the exact fill quantum is unknown until final engineering detail is provided, the Applicant is committed to only utilising recycled excavated soil on the site (if any) or locally sourced Virgin Exacavated Natural Material (VENM).
ERLEP 2013 Clause 6.3(4) (Terrestrial Biodiversity)	(4) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that— (a) the development is designed, sited and will be managed to avoid any significant adverse environmental impact, or (b) if that impact cannot be reasonably avoided by adopting feasible alternatives—the development is designed, sited and will be managed to minimise that impact, or	The Project footprint, as amended, has been designed to avoid all Biodiversity Sensitivity as identified in the LEP.

(c) if that impact cannot be minimised—the development will be managed to mitigate that impact.

ERLEP 2013

Clause 6.8 (Essential services)

Development consent must not be granted to development unless the consent authority is satisfied that any of the following services that are essential for the proposed development are available or that adequate arrangements have been made to make them available when required—

- (a) the supply of water,
- (b) the supply of electricity,
- (c) the disposal and management of sewage,
- (d) stormwater drainage or on-site conservation,
- (e) suitable road access.

The supply of electricity, stormwater drainage and suitable road access have been considered and are described within the Detailed Description of the EIS, relevant technical assessments, and as amended in this report.

The management of wastewater is proposed to be arranged on a regular basis by independent contractors. Wastewater will be collected on-site and treated off-site.

The supply of electricity will be provided by on-site diesel generators, whose impact has been assessed within the EIS.

Suitability of road access is provided by the proposed road upgrades, as amended in the project description.

The Applicant has engaged Council for the supply of potable water for the workers during construction. Council has confirmed availability, subject to a separate agreement post-determination at a cost for the Applicant.

The Applicant acknowledged that Council would not be able to provide non-potable water. The Applicant advised Council that the existing Water Access Licence covers the predicted water needs for the project. Notwithstanding, the Applicant also committed to sourcing non-potable water from other sources, independent of Council's supply.

4.3 Mandatory Considerations

Table 3 outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS originally submitted and remain valid.

Table 4 Mandatory Consideration

Statutory Reference	Mandatory Consideration	Section in EIS (originally submitted)
Consideration under the EP&A Act and Regulation		
Section 1.3	Relevant objects of the EP&A Act (a) <i>to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,</i> (b) <i>to promote the supply, delivery and maintenance of housing, including affordable housing,</i> (c) <i>to promote productivity through the development and management of the State and its resources,</i> (d) <i>to protect the environment, including the conservation of threatened species of native animals and plants and ecological communities and their habitats,</i> (e) <i>to promote resilience to climate change and natural disasters through adaptation, mitigation, preparedness and prevention,</i> (f) <i>to promote the sustainable management of built and cultural heritage, including Aboriginal cultural heritage,</i> (g) <i>to promote good design, amenity and the proper construction and maintenance of built environments, including the protection of the health and safety of the occupants of buildings,</i> (h) <i>to provide opportunities for participation in environmental planning and assessment,</i> (i) <i>to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</i> (j) <i>to promote a proportionate and risk-based approach to environmental planning and assessment,</i> (k) <i>to promote the orderly and economic use and development of land.</i>	Section 7, Appendix C

Section 4.15	Relevant environmental planning instruments: ▪ Planning Systems SEPP. ▪ T&I SEPP. ▪ R&H SEPP. ▪ B&C SEPP. ▪ ERLEP 2013 (and DLEP 2013 as originally submitted). ▪ Relevant draft environmental planning instruments.	Sections 6 and 7; Appendix C
	Relevant planning agreement or draft planning agreement: ▪ Planning agreement for the Project between the Applicant and Council.	Section 3.2.12 and Section 6.2.3
	Development control plans: ▪ Deniliquin DCP 2016.	Section 7
	The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	Section 6
	The suitability of the Site for the development.	Sections 2.6 and 6
	The public interest.	Section 7
Environmental Planning and Assessment Regulation 2021	(1) <i>A development application must—</i> (a) <i>be in the approved form, and</i> (b) <i>contain all the information and documents required by—</i> (i) <i>the approved form, and</i> (ii) <i>the Act or this Regulation, and</i> (c) <i>be submitted on the NSW planning portal.</i>	Signed Declaration
Mandatory relevant considerations under EPIs		
R&H SEPP – section 3.7	<i>In determining whether a development is—</i> (a) <i>a hazardous storage establishment, hazardous industry or other potentially hazardous industry, or</i> (b) <i>an offensive storage establishment, offensive industry or other potentially offensive industry,</i> <i>consideration must be given to current circulars or guidelines published by the Department of Planning relating to hazardous or offensive development.</i>	Section 6.1.9

R&H SEPP – section 4.6(1)	(1) A consent authority must not consent to the carrying out of any development on land unless— (a) it has considered whether the land is contaminated, and (b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and (c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.	Section 6.1.3
T&I SEPP section 2.122 (4)	(4) Before determining a development application for development to which this section applies, the consent authority must— (a) give written notice of the application to TFNSW within 7 days after the application is made, and (b) take into consideration— (i) any submission that RMS provides in response to that notice within 21 days after the notice was given (unless, before the 21 days have passed, TFNSW advises that it will not be making a submission), and (ii) the accessibility of the Site concerned, including— (A) the efficiency of movement of people and freight to and from the Site and the extent of multi-purpose trips, and (B) the potential to minimise the need for travel by car and to maximise movement of freight in containers or bulk freight by rail, and (iii) any potential traffic safety, road congestion or parking implications of the development.	Section 6.1.6
Edward River LEP 2013 (and Deniliquin LEP 2013 as originally submitted)	Objectives and land uses for RU1 – Primary Production and SP2 – Infrastructure Zones. Part 4 – Principal development standards. Part 5 – Miscellaneous provisions. Part 6 – Additional local provisions.	Appendix C
Considerations under other legislation		
BC Act – section 7.14	(1) This section applies to an application for development consent for State significant development under Part 4 of the Environmental	Section 6.1.1

Planning and Assessment Act 1979, or an application for approval for State significant infrastructure under Part 5.1 of the Environmental Planning and Assessment Act 1979, that is required under Division 2 to be accompanied by a biodiversity development assessment report.

(2) The Minister for Planning, when determining in accordance with the Environmental Planning and Assessment Act 1979 any such application, is to take into consideration under that Act the likely impact of the proposed development on biodiversity values as assessed in the biodiversity development assessment report. The Minister for Planning may (but is not required to) further consider under that Act the likely impact of the proposed development on biodiversity values.

Development Control Plans

Deniliquin DCP 2016	Clause 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD. As such, there is no requirement for assessment of the Project against the Deniliquin DCP 2016 for this SSDA. Notwithstanding this, best-practice consideration has been given to the DCP.	Section 7
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5 Assessment of Impacts

5.1 Overview and Comparative Analysis

The amended project includes works within the TransGrid substation compound to enable the expansion of the existing driveway, in order to allow heavy vehicles of up to 19m in length to be able to safely enter and exit the compound safely. Importantly, no additional environmental impacts will arise as a result of this formal inclusion, as these were already assessed as part of the SSDA works.

The preliminary drawings for this necessary expansion are provided in Figure 1, and they were approved and conditioned as part of the nearby SSD-72258210. The project commits to undertaking the same upgrades to the TransGrid substation compound access and road treatments, should SSD-72258210 not have them completed when pre-construction works begin. The Final Updated Road Upgrades drawings will be prepared to the satisfaction of the Planning Secretary as part of the Transport Management Plan.

The updated Transport Impact Assessment (**TIA**) has included consideration of the swept path analysis in the TransGrid access intersection and concluded that the proposed upgrades are suitable for the project (SSD-61612229), subject to the implementation of proposed road treatment works and a Transport Management Plan.

Element	Original Development	Amended Development
Land Use Activity	Electricity generation – Battery Energy Storage System, and associated ancillary infrastructure, connection works and pre-construction enabling activities	No change
Vegetation Removal	Extent of disturbance to existing vegetation – 260m ² No offset requirements are required as calculated per the BAM-C	No change
Traffic Generation	- Up to 20 light vehicles per day (classified as up to a utility vehicle towing a trailer) - Up to 4 heavy rigid vehicle movements per day (classified as up to a 12.5m long rigid truck) These volumes are maximums and pre-construction works volumes would usually be minimal day-to-day. - No more than 25 heavy vehicle movements a day (a maximum of 3 heavy vehicle movements per hour) during construction, upgrading or decommissioning. - One high-risk heavy vehicle requiring escort	There are no proposed changes to the assessed traffic generation for accessing the BESS site. As outlined in Section 5.2, further assessment of traffic generation has been completed related to the TransGrid substation upgrade works.

Vehicle Movement	All project-related vehicles will not turn right from the Riverina Highway into the Site Access.	No changes are proposed to the assessed access for the BESS site. The updated TIA prepared in response to DPHI's request for information has clarified the mitigation measures for site access will include CCTV monitoring to restrict construction vehicles turning right from the Riverina Highway. The proposed amendment to include the upgrade to the Substation has also been assessed in the updated TIA. Construction vehicles that may access the Substation Compound from the west, including light vehicles and vehicles of up to 19 metres, will need to turn right into the Substation site. This will be facilitated by the provision of road treatments to facilitate road safety and will be included within the final Traffic Management Plan (TMP) in consultation with TfNSW. The strategic design of the intersection upgrade as identified in Section 3.2 has been adopted from the strategic design in the TIA for the approved Deniliquin BESS project SSD-72258210.
Development Footprint	Schedule of lands as follows: - Lot 1 DP536901 - Lot 11 DP856212 - The land identified for road upgrades at: - The Riverina Highway to provide an AUL treatment into the Site. - Cobb Highway/Hardinge Street - Hardinge Street / Charlotte Street - Charlotte Street / Davidson Street	Schedule of lands as follows: - Lot 1 DP536901 - Lot 11 DP856212 - The land identified for road upgrades at: - The Riverina Highway to provide an AUL treatment into the Site. - Cobb Highway/Hardinge Street - Hardinge Street / Charlotte Street - Charlotte Street / Davidson Street - The Riverina Highway to provide access into the TransGrid Deniliquin Substation and road treatment.
Operational Life	Between 30 and 40 years	20 years, as per the letter of offer with Council

5.2 Assessment of Transport Impacts for the TransGrid Substation Upgrade works

The TransGrid Substation Upgrade works are expected to generate a maximum of 60 vehicle movements per day during peak construction periods. Table 5 provides a breakdown of indicative worker and construction vehicle trips and sizes for the upgrade works.

This assessment of maximum vehicle movements applies specifically to the TransGrid Substation Upgrade construction works and is separate to the limits assessed and applied specifically to the BESS construction works.

Table 5 Total vehicle traffic volumes during peak Transgrid Substation works

Vehicle type	Number of daily movements (vpd)	AM Peak hour trips (vph)	PM Peak hour trips (vph)
Shuttle Buses	4	4	4
Utility Vehicles	6	6	6
Total Light Vehicles	20	10	10
HRV's	50	6	0
AV's			
Total Heavy Vehicles	50	6	0
Total Vehicle Generation	60	16	10

One vehicle movement = a vehicle arriving **and** leaving (equals two trips)

One vehicle trip = a vehicle arriving **or** a vehicle leaving – i.e. inbound and outbound trips counted separately

TransGrid Substation Works Traffic Impact on Riverina Highway

All construction vehicle traffic associated with the TransGrid Substation works will follow the same haulage route as the primary construction phase of the BESS site. All workers will be accommodated under the same arrangement as the primary construction phase of the BESS site.

All vehicles associated with the construction works for the TransGrid Substation shall originate from and depart toward the west. On this basis, the peak hour construction traffic generation on the Riverina Highway during TransGrid Substation works is summarised in Table 6.

Table 6 Total peak hour TransGrid Substation construction traffic on Riverina Highway

	Estimated Existing Traffic Volume (vph)	Total Construction Trips (vph)	Total Traffic Volume (vph)	Percentage Increase
Eastbound (inbound)				
AM	134	14	148	10.4%
PM	148	2	150	1.4%
Westbound (outbound)				
AM	77	2	79	2.6%
PM	92	8	100	8.7%

All volumes represent one inbound or one outbound vehicle per table sub-heading

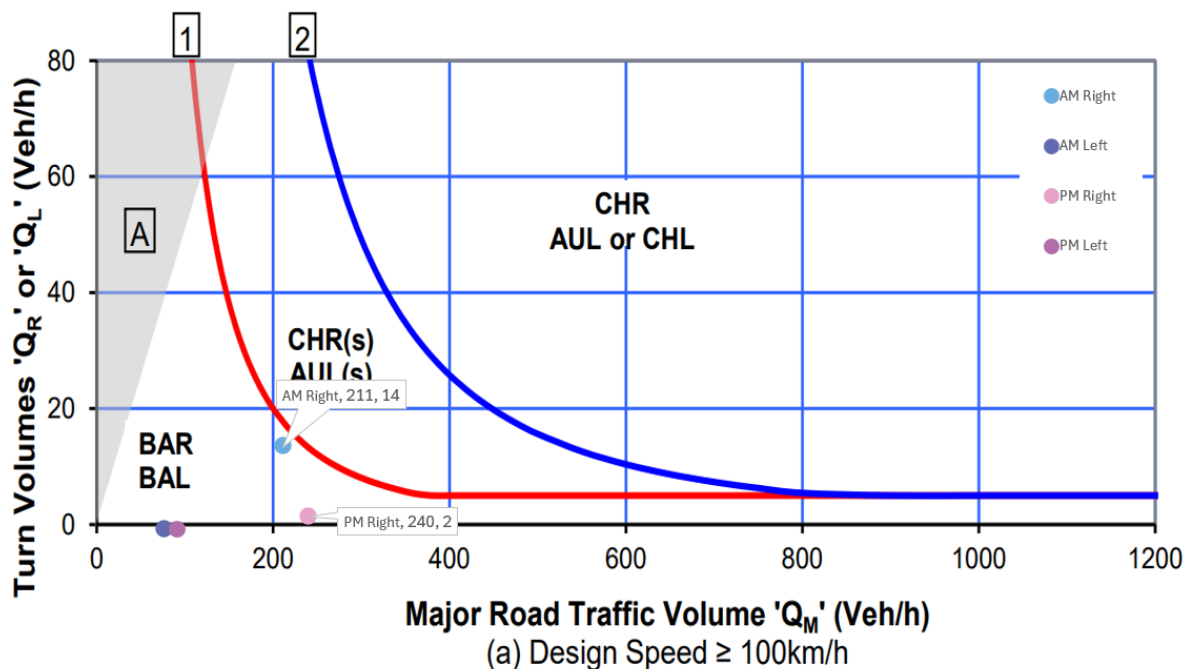
All construction traffic associated with the upgrade works will access the TransGrid Deniliquin Substation site via the existing access point.

An assessment of this access point has been undertaken against Austroads *Intersections, Interchanges and Crossings Management Section 3.3.6 Warrants for Basic Access (BA), Auxiliary Lanes (AU) and Channelised Lanes (CH) Turn Treatments*. The relevant volumes applicable to this assessment are summarised in Table 7.

Table 7 Major Road traffic volumes and proposed turn treatment types

Movement	AM Peak Hour (vph)	PM Peak Hour (vph)	Proposed Turn Treatment Type
Left turn	$Q_M = 77$	$Q_M = 92$	No change
Right turn, no splitter	$Q_M = 134 + 77 + 0 = 211$	$Q_M = 148 + 92 + 0 = 240$	Rural Basic Right Turn Treatment (BAR)

Figure 2 Austroads turn lane warrant assessment – TransGrid Substation works



Based on the assessment in Table 7 and Figure 2, the access requires a BAR treatment on the Riverina Highway to facilitate the efficient movement of construction vehicles associated with the TransGrid Deniliquin Substation upgrade works.

The access design for the TransGrid site access has been prepared by Amber and approved as part of the application for the Deniliquin BESS (SSD-72258210). Figure 3 provides an extract of the strategic concept design for the site access approved for the Deniliquin BESS project.

It is unknown at this stage if the Deniliquin BESS project will provide the intersection upgrade prior to the project requiring it. For efficiency reasons, there may be potential for collaboration between the projects, though this would be determined at a later stage. However, it is acknowledged that this project relies on the intersection upgrade, and thus, the applicant commits to delivering the BAR upgrade in the event that it is not upgraded prior to the project requiring it.

It is proposed to provide an intersection upgrade in line with that shown in Figure 3, already approved as part of SSD-72258210. The intersection upgrade relates to only the access to the TransGrid Substation and would not include the access upgrade to the adjoining property to the east.

TransGrid's Deniliquin Substation access to be upgraded

Private access upgrade not included for Deniliquin East BESS scope

The following design details have been taken from Austroads Guide to Road Design Part 4A

Rural Basic Right-turn Treatment (BAR) - Section 7.2.1.

- 1: Design speed of 110km/h.
- 2: Nominal lane width of 3.5m.
- 3: Formation/carriageway widening is 2.5m, total width (C) is 7m.
- 4: Taper lengths calculate to 38.2m.
- 5: Storage length is 19.0m for one Semi-Articulated Vehicle.

Rural Left-turn Treatment (BAL) - Part 4A Section 8.2.1.

- 1: Design speed of 110km/h.
- 2: Nominal lane width of 3.5m.
- 3: Formation/carriageway widening is 2.5m, total width (C) is 6m.
- 4: Taper lengths calculate to 38.2m.
- 5: Minimum length of parallel widened shoulder used from Table 8.1 is 35m.

Concept Access Design
Deniliquin BESS
Intersection Design (BAR/BAL)

DRAWN: SE
DATE: 08/04/2025
DWG NO: 987 501D
SCALE at A3: 1/750

Amber 00

The swept path assessment in Figure 4 confirms that the largest construction vehicle can suitably enter and exit the TransGrid Deniliquin Substation access.

TransGrid's Deniliquin Substation access to be upgraded

Private access upgrade not included for Deniliquin East BESS scope

Vehicle Envelope
500mm Clearance
Reverse Manoeuvre
Min. Design Speed 5km/h

4200 13700 1300 9500 400 1600 5400

AV

Tractor Width : 2500
Trailer Width : 2500
Tractor Track : 2500
Trailer Track : 2500
Lock to Lock : 6.0s
Steering Angle : 28.3
Articulating Angle 70.0

mm

Concept Access Design
Deniliquin BESS
Transgrid Substation Swept Path Assessment

DRAWN: SE
DATE: 08/04/2025
DWG NO: 987 501D
SCALE at A3: 1:500

Amber 06

Assessment of Impacts 26

The neighbouring Deniliquin BESS project also undertook a sight distance assessment for the TransGrid Substation access point. This confirms that suitable SISD is provided at the Riverina Highway and site access intersection. For completeness, this assessment is extracted and shown in Figure 5.

Figure 5 Extract of sight distance assessment for TransGrid Substation access (prepared by others)

Austroads Guide to Road Design Part 4A: Unsignalised and Signalised Intersections specifies the Safe Intersection Sight Distance (SISD) as the minimum sight distance which should be provided along the major road at any intersection. Table 3.1 of the guide specifies the SISD required for various design speeds. Given Riverina Highway has a speed limit of 100km/hr a design speed of 110km/hr has been adopted which requires an SISD of 300 metres based on a reaction time of 2.5 seconds.

The available sight distance at both access points exceeds the requirements of the Austroads Guide given the relatively flat and straight alignment of the road network. It is noted that some larger trees on the site boundary may need to be pruned to maintain adequate sight distance towards the east for the BESS site access. The sight distance for each direction is depicted within Figure 20 and SISD drawings provided in Appendix E.

Source: Amber Organisation Pty Ltd, Traffic Impact Assessment, dated 15/09/2025 (from NSW SSD Portal)

Therefore, the inclusion of the proposed amendments has been adequately assessed, and it is concluded that the works do not generate a greater environmental impact than what the project originally proposed. The proposed amendments will ensure the appropriate traffic management during the connection phase into the substation at the later stages of the construction program and prior to testing and energisation.

Summary of overall Traffic generation

For clarity, Table 8 summarises the final traffic generation as assessed in the updated TIA, by project phase inclusive of:

- Pre-construction minor works
- Primary BESS construction (peak)
- TransGrid Substation Upgrade works (peak)
- Transmission line connection works
- Operation

It should be noted that the Applicant commits to these phases being sequential, and associated vehicle movements do **not** overlap with each other.

5.3 Assessment of Heritage Impacts

In response to comments from DPHI, it is noted that a part of the substation area was not explicitly identified during the site survey by Urbis and the Registered Aboriginal Parties (**RAPs**). The substation area was originally assessed in the EIS phase, and it is not subject to this Amendment Report.

For clarity, the Aboriginal Cultural Heritage Assessment (**ACHA**) prepared by Urbis covered the entire development footprint as identified within the proposed Base Plan in Appendix B submitted with the EIS. The subject area in the ACHAR identified the area of site survey. Through consultation with the registered Aboriginal parties, it was agreed that survey of land within the substation was not required due to the land's highly disturbed nature. Notwithstanding, all aspects of the proposed impacts of the development footprint have been assessed, consulted on with registered Aboriginal stakeholders, and the provided conclusions and recommendations are still valid. No additional investigation or consultation is needed, nor any updates required to the ACHAR to support this Amendment Report.

Table 8 Summary of proposed traffic generation by project phase

Project phase	Vehicle type	Number of daily movements (vpd)	AM Peak hour trips (vph)	PM Peak hour trips (vph)
Pre-construction minor works	Light vehicles	20	4	4
	Heavy vehicles (HRV ≤12.5 m)	4	1	1
	Total	24	5	5
Primary BESS construction (peak)	Light vehicles (shuttle + utilities)	10	10	10
	Heavy vehicles (HRV, low loader, B-double)	50	6	0
	Total	60	16	10
TransGrid substation works (peak)	Light vehicles	20	10	10
	Heavy vehicles (HRV)	50	6	0
	Total	60	16	10
Transmission line connection works	Heavy vehicles – Stage 1	24	4	4
	Heavy vehicles – Stage 2	20	4	4
Operation	Light vehicles	2–6 (approx.)	Negligible	Negligible
	Heavy vehicles	Occasional	Negligible	Negligible

One vehicle movement = a vehicle arriving **and** leaving (equals two trips)

One vehicle trip = a vehicle arriving **or** a vehicle leaving – i.e. inbound and outbound trips counted separately

6 Justification of the Amended Project

6.1 Project Design

The Project, as amended, has been designed to:

- Provide the most efficient use of available land.
- Minimise the footprint of physical disturbance (such as native vegetation clearance or soil and water disturbance).
- Minimise impacts on sensitive landforms and the local environment through the provision of high-quality management measures and processes.
- Minimise the likelihood of pollution to the soil and water environment through the adoption of industry-standard controls.
- Minimise any risks from the nature of the Project and conflict with surrounding land uses.
- Minimise any impacts on agricultural resources by carefully adopting construction measures to provide a net positive outcome for the region.
- Minimise any impacts onto the local road network and infrastructure through the establishment of safe sight distances and a deceleration lane in consultation with TfNSW and TransGrid.

6.2 Strategic Context

The Project, as amended, will continue to support the delivery of battery storage to benefit the local and regional communities in respect to reliable and cost-effective power. The Project assists in delivering the objectives outlined in the NSW Electricity Strategy and Climate Change Act. Additionally, the Project is consistent with the NSW Electricity Infrastructure Roadmap.

Renewable energy is one of the fundamental pillars in achieving the transition from fossil fuels, establishing energy independence and security and achieving Net Zero. Given the number and scale of the proposed renewable energy projects within the nearby SWREZ, the Project will offer additional firming capacity and energy security to the region. This is in line with the international and national need for achieving a decarbonised economy and the Paris Agreement and signatory targets as a key step in mitigating the impacts of climate change.

Regionally, the Project aligns with both the Riverina Murray Regional Plan 2041 (**RMRP**), the Edward River Local Strategic Plan (**LSPS**) 2020 and the Edward River Growth Strategy 2050 regarding environmental protection and economic goals, particularly towards Objective 11 and 13 of the RMRP 2041. This objective aims to support the State's transition to its Net Zero 2050 objective. The South-West region is one of the Renewable Energy Zones across NSW and is expected to attract \$2.8 billion in investment by 2030.

The Project is located near the SWREZ on a site with accessible road access, which helps connecting the Site to both the Melbourne and Geelong Ports and allows for easy access during the construction. Additionally, the close location to the Deniliquin Substation precludes the need to construct significant additional components and capitalise on existing infrastructure to firm renewable energy capacity as early as possible.

6.3 Statutory Context

The assessment of the relevant Environmental Planning Instrument concludes that the Project as amended complies with the relevant provisions within the relevant instruments as summarised below:

- The Project has been assessed and designed with respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act and addressed in Table 4.

- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulations.
- Consideration is given to the relevant matters for consideration as required under the BC Act and the SSD is supported by a BDAR accordingly.
- This SSDA pathway has been undertaken in accordance with the Planning Systems SEPP as the Project is classified as SSD.
- The Project complies with all of the relevant provisions under the Edward River LEP 2013.
- The Project been assessed in accordance with the R&H SEPP and it complies with the relevant clauses.
- The Project generally accords with the relevant provisions of the Deniliquin DCP 2016.

Table 9 Project Consistency

Object	Consistency with the Project as amended
<i>To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources</i>	Resources within the Project's development footprint include both the land that is being used for agricultural production and land with biodiversity, hydrology and Aboriginal Cultural Heritage values. This constitutes the <i>natural resources</i> that must be properly managed, developed or conserved. The Project has avoided the biodiversity values of the land and has a limited footprint on the present native vegetation. The development footprint can be returned to its original agricultural land use at the completion of the Project's operation. Measures to avoid and minimise will be implemented during the construction and operational phases to ensure the appropriate management and conservation of natural resources.
<i>To promote the supply, delivery and maintenance of housing, including affordable housing</i>	Although the Project does not involve the direct delivery of housing, the project commits towards reducing its impact on local short-term accommodation for its workforce through the preparation of a comprehensive and refined Workforce Accommodation Strategy prior to construction and in close consultation with Edward River Council.
<i>To promote productivity through the development and management of the State and its resources</i>	The Project will leverage the State's existing electrical infrastructure to provide for stable renewable energy to feed into the national grid, which will assist with the energy transition and improve the productivity of the overall network.
<i>To protect the environment, including the conservation of threatened species of native</i>	As discussed in the BDAR, the Project will have a negligible impact on the native biodiversity values of the region, as its location has been

<i>animals and plants and ecological communities and their habitats</i>	appropriately selected to avoid these as much as possible. Any residual impacts will be further mitigated during construction and operation.
<i>To promote resilience to climate change and natural disasters through adaptation, mitigation, preparedness and prevention</i>	The nature of the Project will enable the energy transition towards renewable energy generation, which in itself will promote resilience to climate change by helping reduce carbon emissions. Furthermore, the Project includes mitigation measures to prevent impacts derived from bushfire and flooding risks, the only potential natural disasters that may impact its normal operation.
<i>To promote the sustainable management of built and cultural heritage, including Aboriginal cultural heritage,</i>	The Project does not involve any impact on built heritage. An Aboriginal Cultural Heritage Assessment (ACHA) has been prepared as part of the EIS. Although the ACHA has concluded that the Project has a low risk of affecting any potential Aboriginal values on the site, the Project will include mitigation measures, such as an Unexpected Finds Protocol, to eliminate any potential impact on the Aboriginal cultural heritage of the site.
<i>To promote good design, amenity and the proper construction and maintenance of built environments, including the protection of the health and safety of the occupants of buildings,</i>	The Project does not relate to the built environment.
<i>To provide opportunities for participation in environmental planning and assessment</i>	There has been an extensive range of community consultation activities and resources to provide the community with the information about the Project and seek feedback.
<i>To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment</i>	The EIS describes the economic, environmental and social context of the Project as well as its potential impacts, which would allow informed consideration of these aspects in determining the application. The Project will contribute to the sustainable and continued production of net-zero and clean energy storage.
<i>To promote a proportionate and risk-based approach to environmental planning and assessment</i>	The Project will incorporate measures to avoid and minimise potential impacts based on the nature of the impacts and proportionate to their risk.
<i>To promote the orderly and economic use and development of land</i>	The orderly and economic use of the land can be best achieved by development that is permissible by the relevant environmental planning instruments in accordance with prevailing controls.

The Project is permissible with consent under the T&I SEPP and consistent with statutory and strategic planning controls.

The Project will result in a positive economic benefit, with appropriate mitigation and management measures to reduce adverse environmental and social impacts.

6.4 Community Views

Community views have expressed both negative and positive aspects of the Project. Consultation has reflected some concerns from the community relating to some environmental and social impacts and the Project has included consideration of these views where possible.

Some of the responses to the Project were:

- The inclusion of a visual buffer for adjoining neighbours to mitigate possible visual impacts.
- The inclusion of acoustic mitigation measures to eliminate any residual noise impacts.
- The Applicant has coordinated a proposed public benefit offer to contribute annually to a community benefit fund administered by Council.

Further community consultation has not been deemed necessary as part of this Amendment Report, as the works involved are minimal and of negligible material impact. Notwithstanding, consultation is underway with key stakeholders including TransGrid, Murray Irrigation and the Applicant for the adjacent Deniliquin BESS project (**SSD-72258210**). The Applicant is committed to continued engagement with the key stakeholders through the project lifecycle.

6.5 Likely Impacts of the Proposal

The Project has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment:** the Project addresses the principles of ecologically sustainable development (**ESD**) in accordance with Clause 193 of the EPA Regulations 2021 and as outlined below:
 - Precautionary principle: the precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation. The Project has evaluated measures to avoid environmental impacts where possible and mitigate them if unavoidable; a comprehensive assessment of all the risk-weighted consequences has been undertaken for each environmental impact for all feasible options.
 - Intergenerational equity: the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations. The Project will ensure intergenerational equity is maintained across society by providing a sustainable source of energy that helps decarbonise and mitigate the future impacts of climate change.
 - Conservation of biological diversity and ecological integrity: the Project has been designed to avoid the most important on-site natural values where possible and mitigate and minimise other impacts where unavoidable. Avoidance of impacts includes retaining valuable areas of high biodiversity for conservation, as well as construction measures to ensure no residual impacts are produced on retained native vegetation, such as tree protection zones and protective fencing.

- Improved valuation, pricing and incentive mechanisms: the holistic consideration of environmental resources that may be affected because of the Project have been considered, including environmental and agricultural. It has been concluded that neither the ecological services of the region nor the agricultural value of the land will be significantly or permanently affected by the Project. It is considered that the economic prospects from the Project will result in a net positive outcome for the region.
- **Social**: It is considered that all feasible options have been included as part of the Project design, such as workforce accommodation and services, to avoid any stress on local resources and the cumulative impacts with other projects onto the socio-economic fabric of the region as much as possible.
- **Economic**: It is considered that the Project will result in a net positive economic outcome for the region, including the generation of employment for the community during construction and operation. Other land uses, such as surrounding agricultural activities, will not be impacted by the Project.

6.6 Suitability of the Site

The Site is considered highly suitable for the Project for the following reasons:

- It is permissible under the T&I SEPP.
- It fully complies with all the Statutory Requirements.
- It is considered that it can be developed without significantly impacting surrounding land uses and the environment.
- It has limited environmental values, most of which have been avoided.
- The presence of the existing nearby Deniliquin Substation will allow the Project to capitalise on existing electrical infrastructure and deliver sustainable energy as soon as possible.
- Where impacts were not possibly avoided, the physical nature of the Site has allowed for the inclusion of mitigation measures.

The following environmental impacts have been considered during the design phase of the Project, which has resulted into its current form:

- The Project will have no impact on biodiversity values on-site, such as native vegetation.
- The provision of stormwater retention works to avoid and minimise any potential impacts from the Project onto the surface water quantity. Other mitigation measures, such as self-bunded containers, will be implemented to avoid impacts onto the water quality of the area. A Soil and Water Management Plan will be prepared prior to the construction of the Project with measures to monitor and mitigate any further residual impacts.
- Landscaping buffers and screening are proposed to ameliorate the visual impact of the Project on the public domain.
- The selection of noise-efficient components has been included during the acoustic assessment. This process validated the avoidance of residual acoustic impacts in accordance with the *Noise Policy for Industry 2017 guidelines*.
- Construction of a bridge and deceleration lane onto the Riverina Highway and an appropriate internal road system have been provided to accommodate vehicle movements during construction.
- Employment and funding will be provided to the wider community, which will affect positively the regional economy.
- The Site is appropriate and compatible with certain surrounding agricultural practices during operation. The Site will also be able to be remediated properly after decommissioning, re-instating its inherent agricultural value to the region.

- Consideration has been given to the limitations of the regional waste management systems. A certified waste management contractor will be engaged prior to the construction of the Project, which will assist with the transport of waste streams generated that cannot be re-used on-site.

6.7 Public Interest

The Project is considered in the public interest for the following reasons:

- The Project is consistent with the relevant Commonwealth's Renewable Energy Target, NSW's *Climate Change Act*, NSW's *Climate Change Policy Framework* and *Net Zero Plan Stage 1: 2020–2030*.
- The Project is consistent with the relevant planning controls, including the EP&A Act and relevant EPIs.
- The Project will contribute 100MW of reliable, firming energy to the National Electricity Market, in the form of a 100MW/200MWh BESS. This will help achieve the Integrated System Plan long-term objectives.
- The Project is in close proximity to the SWREZ, declared by the Minister for Energy in 2022 under section 24(1) of the *Electricity Infrastructure Investment Act 2020*. Although outside of its boundaries, the Project will assist the objectives of the REZ, helping unlock additional reliable capacity in NSW.
- The Site is appropriate, with available connection to the existing electricity network and accessible transport routes.
- The Project will provide flow-on benefits to the local community, including 50 construction jobs at its peak, up to two operational jobs, and contributions to the Edward River Council as stipulated in the Planning Agreement to improve local services and infrastructure.
- There will be broader benefits to the State and Commonwealth, with the injection of \$100 million in capital into the NSW economy.
- No significant environmental, social and economic impacts will result from the Project. Residual impacts can be minimised, mitigated and/or offset where necessary.

Having considered all relevant matters, it is concluded that the Project, as amended, continues to be appropriate for the Site and approval is recommended, subject to appropriate conditions of consent.

7 Conclusion

This Amendment Report has been prepared in accordance with the *State significant development guidelines – preparing an amendment report (March, 2026)*.

This Amendment Report demonstrates that the proposed development remains consistent with the strategic and statutory planning provisions that apply to the site. The potential environmental impacts arising from the proposed development have been comprehensively assessed and can be mitigated, minimised and/or managed to avoid unacceptable impacts to the site or the locality. All additional amendments have been thoroughly reviewed and responded to in this report and supporting documentation.

Accordingly, the site remains suitable for the proposed development and continues to be in the public interest. The Applicant kindly requests that the Project be approved, subject to appropriate conditions.

Disclaimer

This report is dated June 2026 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of BESS Arctic Pty Ltd C/o Gransolar Group (**Instructing Party**) for the purpose of Amendment Report (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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