

Response to Request for Further Information

*Deniliquin East BESS-SSD-
61612229*

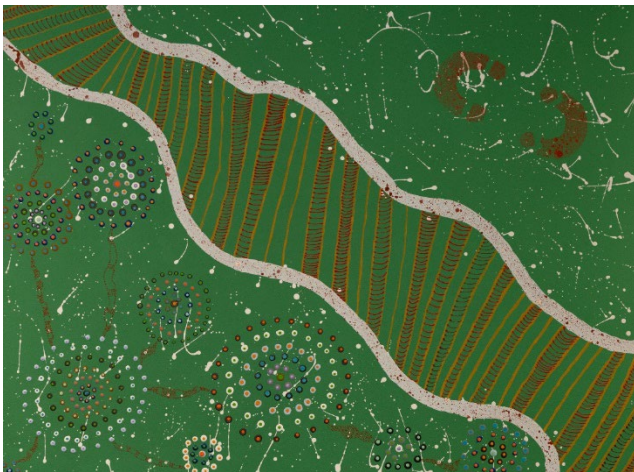
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Project Code	P0050308
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Acknowledgment of Country

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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Glossary and Abbreviations

Reference	Description
ACHA	Aboriginal Cultural Heritage Assessment
AEP	Anderson Environment and Planning
AIA	Arboricultural Impact Assessment
BAM	Biodiversity Assessment Method
BAM-C	Biodiversity Assessment Method Calculator
BC Act	<i>Biodiversity Conservation Act 2016 (NSW)</i>
BDAR	Biodiversity Development Assessment Report
BESS	Battery Energy Storage System
BSAL	Biophysical Strategic Agricultural Land
CEEC	Critically Endangered Ecological Community
CEMP	Construction Environmental Management Plan
Council	Edward River Council
DP	Deposited Plan
DPHI	Department of Planning, Housing and Infrastructure
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPA	New South Wales Environment Protection Authority
ESD	Ecologically Sustainable Development
GP	General Practitioner
ha	Hectares
HIPAP	Hazardous Industry Planning Advisory Paper
IPC	Independent Planning Commission

kV	Kilovolt
Km	Kilometre
LGA	Local Government Area
LLS	Local Land Services
MRA	MRA Consulting Group
MW	Megawatts
MWac	Megawatts, alternating current
NHVR	National Heavy Vehicle Regulator
NIA	Noise Impact Assessment
NPfi	Noise Policy for Industry
NSW	New South Wales
OSOM	Oversize and/or Over Mass Vehicle
PBP	<i>Planning for Bush Fire Protection 2019</i>
PCT	Plant Community Type
PCUs	Power Conversion Units
Planning Systems SEPP	<i>State Environmental Planning Policy (Planning Systems) 2021</i>
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
PV	Photovoltaic
REZ	Renewable Energy Zone
RFS	NSW Rural Fire Service
RNP	NSW Road Noise Policy
SAII	Serious and Irreversible Impacts
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
Site	Lot 2 in DP 528667 and Lot 2 in DP 734669
SSD	State Significant Development
SSDA	State Significant Development Application

TfNSW	Transport for New South Wales
TIA	Transport Impact Assessment
VIA	Visual Impact Assessment
Vehicle movement	A measure of traffic volume where an inbound and outbound vehicle associated with a single visit are counted together as one movement. One movement is equal to two trips.
Vehicle trip	A measure of traffic volume where inbound and outbound vehicles are counted separately, with each direction counted as one trip. Two trips are equal to one movement.
WSP	WSP Global Inc.
WMP	Waste Management Plan

1 Response to Request for Further Information

This Response to Request for Further Information Report (**Report**) has been prepared on behalf of BESS Arctic Pty Ltd c/o Gransolar Development Australia (**the Applicant**) to address the matters raised by government agencies and Edward River Council (**Council**), during the assessment of the proposed Deniliquin East Battery Energy Storage System (**project**) development at 21356 Riverina Highway, Deniliquin (**site**).

State Significant Development Application (SSD-61612229) (**SSDA**) was lodged with the Department of Planning, Industry and Infrastructure (**DPHI**) in accordance with the *State Environmental Planning Policy (Planning Systems) 2021*.

In March 2026, DPHI issued a request for further information (**RFI**) in relation to the SSDA following the submission of the response to submissions (**RTS**) report on 12th February 2026.

The Applicant has prepared all necessary information to address the RFI from DPHI and respond to additional agency feedback, in particular:

- Department of Climate Change, Energy, the Environment and Water – Conservation Programs, Heritage, and Regulation (**CPHR**)
- Edward River Council (**Council**)
- DPHI Hazards
- Murray Irrigation
- Transport for New South Wales (**TfNSW**)

No other agencies have provided further comments or requests in relation to the project.

This Report seeks to clarify and respond to all the requested information and provide acceptable solutions at this planning stage. Extensive consultation has been undertaken with all relevant stakeholders, and a summary of the consultation is provided in the following sections.

1.1 The Project

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

The inclusion of the road works necessitates an administrative amendment to the project, which will be detailed in an Amendment Report prepared and submitted under section 37 of the *Environmental Planning and Assessment Regulation 2021* (**EP&A Regulation**)

In parallel with the Amendment Report this Report addresses the following matters:

- Separation distances between BESS units and total BESS output capacity.
- Clarification of early works, including necessary road upgrades, prior to the construction of the central compound.
- Clarification of the culvert element over the Moulamein Channel.
- Waste management and workforce accommodation.
- Statutory requirements under the *Edward River Local Environmental Plan 2013* (**ERLEP**)

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 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 the separate 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 and 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.

1.2 Supporting Documentation

The following documentation is submitted with this Report and form part of the response to the RFI:

- Updated Biodiversity Development Assessment Report (**BDAR**)
- Updated Transport Impact Assessment (**TIA**)

2 Response to Agency and Council Submissions

Comments were received from a total of five government agencies and Council. This section responds to the comments and provides further information to support the assessment of the Project.

2.1 DCCEEW – Conservation Programs, Heritage and Regulation

The following table summarises the commentary from CPHR and the Applicant's response. A comprehensive response and updated BDAR can be seen appended to this report.

Topic	Comment	Applicant Response
Impact on Flood Behaviour	<i>Pre-construction, the hydraulic model must be updated to incorporate the detailed design of the proposed development, including all ancillary infrastructure and works. The updated model should accurately reflect the project's impact on flood behaviour and inform the detailed design process, ensuring that potential impacts are minimised or avoided.</i>	The Applicant acknowledges this request and commits to updating the hydraulic model during detailed design post determination of the SSDA to further inform the preparation of a Flood Emergency and Response Plan (FERP). This updated modelling will also inform the detailed design of the proposed culvert over the Moulamein Channel so that it complies with the relevant structural engineering requirements and to minimise impacts. The Applicant accepts a condition of consent to complete these actions prior to commencement of construction.
Mitigation and Management Measures	<i>Update section 5.5 of the BDAR to include mitigation measures for managing residual impacts of the project and preventing inadvertent disturbance outside of the project footprint. Mitigation measures should follow SMART principles (specific, measurable, achievable, relevant, time-bound) and include those measures already identified in the BDAR.</i>	The Applicant acknowledges this request for clarity in the BDAR. The BDAR has been updated and appended to this report. The proposed mitigation measures include: ▪ Avoidance of native vegetation and fauna habitat will be facilitated by ground-truthing and pre-clearance surveys. ▪ Establishment of fencing around no-go areas for native vegetation prior to commencement of tree clearing and earthworks. ▪ Minimisation of vegetation removal for powerline clearance. ▪ Construction will be confined to existing exotic pasture grassland and no clearance of native vegetation.

- The project will include the installation of sediment controls (e.g. silt fencing) prior to commencement of earthworks and vegetation clearing, stabilisation of disturbed soils and use of appropriately sized machinery.
- Spill kits will be available onsite, refuelling and maintenance will be undertaken away from channels.
- Lower speed limits will be enforced onsite to avoid vehicle strikes on native fauna.

It is considered that, upon the implementation of the proposed mitigation measures, the potential for residual environmental impacts can be appropriately managed.

2.2 Edward River Council

The following table summarises the commentary provided by Edward River Council and the Applicant's response.

Topic	Comment	Applicant's Response
Servicing and Commissioning	<i>The comments regarding servicing and commissioning are unclear as to when the matters raised by council will be addressed. Servicing and site demands should be considered prior to determination to ensure the development is suitable and adequate arrangements can be made.</i>	The Applicant met with Council on the March 23rd 2026 to discuss the matters raised during the RTS Review. The following represents the agreed positions between the Applicant and Council in relation to the matters raised which requires the submission of further information post-determination of the SSDA, as follows:
Waste Management	<i>The matters raised by Council were not adequately addressed in response to submissions. Council noted in the submission (dated 9 July 2025) that the Deniliquin landfill cannot accept commercial construction waste at council's facilities, however page 10 of the Waste Management Plan in support of this development states the majority of waste will be disposed of at the Deniliquin landfill.</i> <i>Council requests this matter be addressed as the response does not consider council's concern raised.</i>	▪ Non-potable water: 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. ▪ Potable water: Council supply will be able to meet the daily potable water requirements. Future agreements and provisions for water supply will be prepared post-determination.
Employment and Accommodation	<i>Council acknowledges the response to the accommodation and employment</i>	

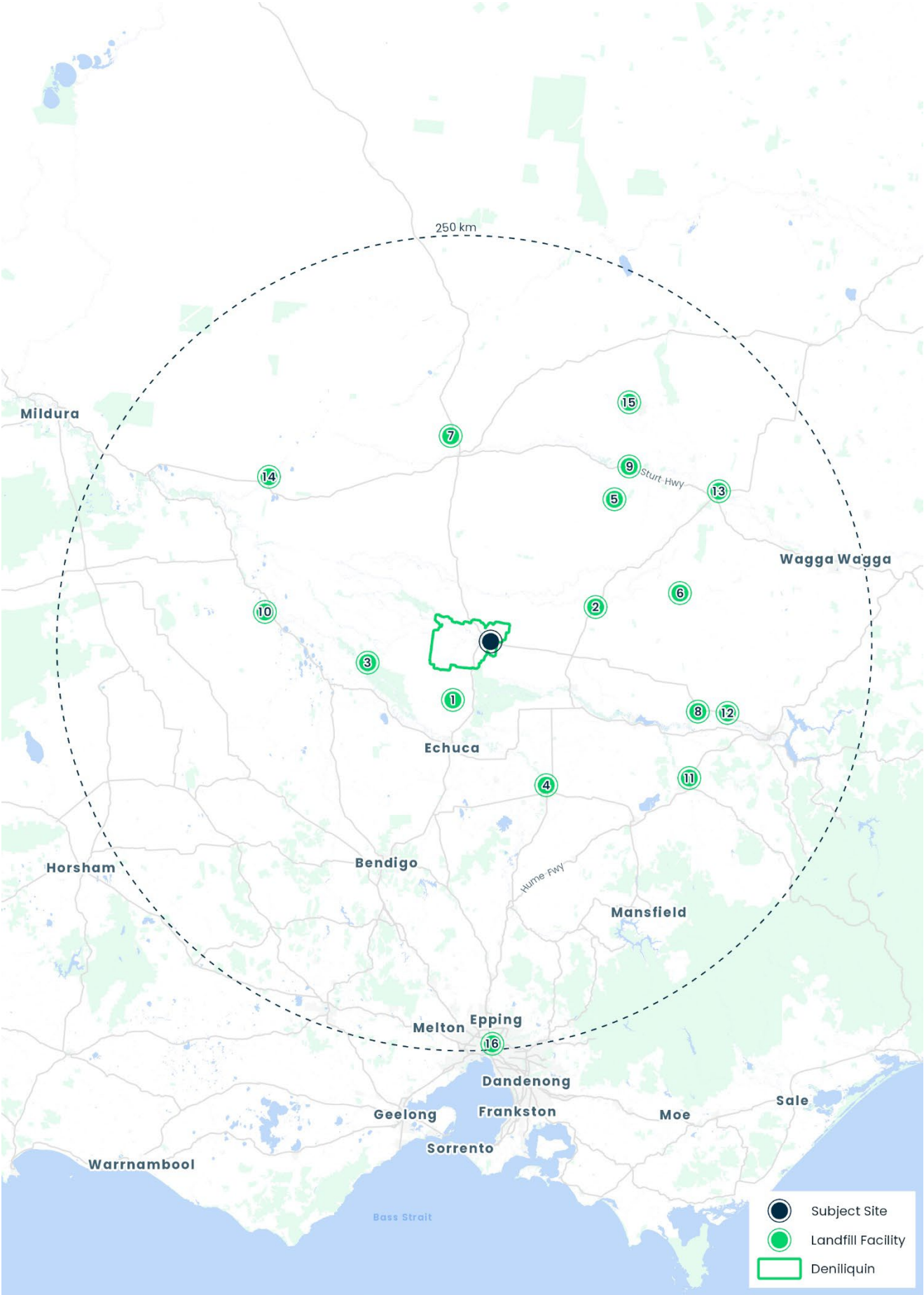
concerns, and it is noted within the response that a workforce plan will be prepared for post-approval. Edward River Council, the LGA and Deniliquin in particular, are facing current and significant challenges with accommodation shortages and availability for the current population and needs.

It would be remiss for any SSD development and/or Project to not comprehensively address the housing pressures and accommodation challenges as part of the development and design of the project, and the cumulative impacts from the wider REZ within our region. Noting this, Council would expect an Accommodation and Employment Strategy to be prepared prior to the determination of the development to ensure adequate arrangements and/or alternatives (i.e. accommodation camps, legacy housing, etc.) have been appropriately considered and can be implemented should the development be supported.

The response provided within the 'Submission Report' does not adequately consider or address the concerns of Edward River Council.

- **Wastewater:** The Applicant will source independent third-party contractors and arrangements to manage wastewater for the project.
 - **Waste Management:** Council confirmed that the Deniliquin Landfill is unable to accept waste from the project. The Applicant acknowledges this position and will review the Waste Management Plan (**WMP**) in consultation with Council prior to construction commencing to identify locations for disposal of construction and operational waste and will engage third-party contractors to deliver the requirements of the final WMP. A preliminary review of regional landfill locations has identified potential alternative sites for disposal that will be considered during the finalisation of the WMP prior to commencing construction. These alternate sites are shown in **Figure 1 and Table 1** below. The Applicant accepts a condition of consent requiring an updated WMP to be prepared prior to commencement of construction.
 - **Employment and Accommodation Strategy:** The Applicant and Council agreed to the preparation of an updated Employment and Accommodation Strategy prior to commencement of construction. The Applicant is willing to coordinate with Council on the finalisation of the Employment and Accommodation Strategy. The Applicant accepts a condition of consent requiring an updated Employment Accommodation Strategy to be prepared prior to commencement of construction.
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Figure 1 Potential Alternative Landfill Locations – their feasibility will be clarified within the final WMP



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Table 1 Potential Alternative Landfill Locations – their feasibility will be clarified within the final WMP

Map ID	Facility Name	LGA	Distance from site (km)
1	Moama Waste Management Facility	Murray River Council	43
2	Jerilderie Tip	Murrumbidgee Council	68
3	Barham Landfill	Murray River Council	77
4	Shepparton Landfill	Greater Shepparton City Council	94
5	Tharbogang Recycling and Waste Disposal Facility	Murrumbidgee Council	116
6	Urana Landfill	Federation Council	120
7	Hay Transfer Station	Hay Shire Council	130
8	Corowa Waste Management Centre	Federation Council	134
9	Darlington Point Waste Depot	Murrumbidgee Council	137
10	Swan Hill Landfill	Swan Hill Rural City Council	140
11	Bowser Landfill	Wangaratta City Council	148
12	Howlong Waste Management Centre	Federation Council	152
13	Narrandera Landfill	Narrandera Shire Council	168
14	Balranald Landfill	Balranald Shire Council	170
15	Tharbogang Recycling and Waste Disposal Facility	Griffith City Council	170
16	East Brunswick Transfer Station	Merri-Bek City Council	247

2.3 DPHI Hazards

DPHI Hazards reviewed the RTS and concluded that the provided information addressed all previous comments and has suitably minimised the risks of the proposed development. As such, no further hazard-related conditions were recommended, beyond the following:

- Battery energy discharge and storage limit of 100 MW / 240 MWh, based on the information supplied and to ensure consistency with the final design.
- Preparation of a Fire Safety Study in accordance with DPHI's Hazardous Industry Planning Advisory Paper No. 2 – Fire Safety Study, demonstrating that the final battery design minimises the risk of escalation to adjacent batteries.
- Conditions requiring that the quantity of dangerous goods stored remains below the 'Applying SEPP 33 Guideline' thresholds, and that all fuels and chemicals are stored in accordance with relevant Australian Standards or EPA requirements, to minimise risks associated with dangerous goods.

The Applicant acknowledges these comments and accepts them to be included as part of the conditions of consent.

2.4 Murray Irrigation

The following table summarises the commentary from Murray Irrigation and the Applicant's response.

Topic	Comment	Applicant Response
Contact Requirements	<i>Prior to any works being commenced on or near Murray Irrigation's infrastructure, Murray Irrigation requires the Applicant to contact Murray Irrigation at least six (6) months prior to construction commencing to allow sufficient time for all the relevant information to be reviewed.</i>	The Applicant and DPHI met with Murray Irrigation on March 18th 2026. The Applicant acknowledged the requirement to contact Murray Irrigation prior to construction commencing and remains committed to continuing communication during the period of construction of the culvert over the Moulamein Channel. Murray Irrigation also advised that the construction timeframes for the culvert are seasonal, and so timing will need to be coordinated carefully with Murray Irrigation.
Moulamein Channel	<i>Upon review of the Submissions Report, in addition to the above, Murray Irrigation is seeking further clarity on the infrastructure required at the location on the Moulamein Channel.</i>	It was agreed that final engineering details will be prepared post-determination. Murray Irrigation also proposed that these works be undertaken by their own contractor team. This will be further explored post-determination and in consultation with Murray Irrigation.

2.5 TfNSW

The following table summarises the commentary from TfNSW and the Applicant's response.

Topic	Comment	Applicant Response
Traffic Analysis Requires Clarification on Riverina Highway Turn Treatments	<i>Section 4.7.3 (of the EIS) states that there are no anticipated right turn movements during construction; however, the potential for right turns still exists as no mitigation measures have been advised or commitments to the prohibition of the right turn as part of the TIA assessment. The revised TIA aims to provide a commitment and enforceable traffic mitigation measures and conditions of consent that would be implemented to prohibit the right turn traffic movements into the access from Riverina Highway or review, within a revised turn warrant assessment, the required right turn movements and intersection treatments that would be needed to facilitate the right turn movement.</i>	In a meeting with TfNSW on Thursday, March 30th 2026, it was agreed that construction vehicle access routes, and specifically the "no right turn into the site entry" for construction-related vehicles, could be managed via mitigation measures such as CCTV. It was agreed that a No Right Turn sign, as previously proposed, is not appropriate given the adjacent property using the northern access point. To enforce the no right turn, the Applicant agrees to a condition of consent worded similarly to the below: <i>Unless the Planning Secretary agrees otherwise in writing, all project related construction vehicles are prohibited from turning right from Riverina Highway into the site access.</i> <i>The Applicant must prepare a Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Planning Secretary. This plan must include details to prevent project related vehicles from turning right from the Riverina Highway into the site access.</i> Details of such measures will be developed in consultation with TfNSW and Council. The Applicant commits to continual monitoring of the site access during construction, which could include CCTV video with computer-vision detection and incident logging as part of the final Transport Management Plan (TMP). Additional measures will also be implemented, such as the inclusion of site access requirements within induction processes and regular reminders at daily prestart meetings.
	<i>Revised strategic designs will need to be provided considering the above. See advisory note. Strategic designs have issues raised in part 3 that require amendments. Please review and submit to TfNSW.</i>	Strategic Designs have been updated and appended within the updated Traffic Impact Assessment (TIA).
	<i>The swept paths demonstrate that the proposed bridge will not have two-way functionality with swept</i>	The proposed culvert between the Riverina Highway and the site is approx. 6 metres wide, allowing a two-way functionality for light

	<i>paths shown on top of each other. The proponent must provide further queuing analysis to demonstrate queuing on the state road network will not occur on the state road network as a result.</i>	vehicles. As per the swept path assessment presented in the TIA the width allows only one-way movement for B-Double vehicles. An updated assessment of the suitability of the element is included in Section 4.9.3 of the TIA.
Pre-Construction Minor Works	<i>The previous letter requested specific and quantified detail on pre-construction minor works in points a-k. Section 4.9 provided by the proponent doesn't include the detail requested. This must be provided in the updated TIA.</i>	The updated TIA includes a full assessment of the traffic impacts during the pre-construction minor works phase. The largest vehicle required for pre-construction minor works is a 12.5-metre-long heavy rigid vehicle; however, smaller rigid flatbed trucks may be used to transport any necessary equipment to and from the site. Similar to worker trips for pre-construction minor works, heavy vehicle movements will be ad-hoc in nature. A complete evaluation of vehicle trips and the nature of the required jobs is presented in the updated TIA.
Strategic Concept Design Amendments on Site Access West – Cobb Highway	<i>The following amendments are still required to strategic concept designs:</i> <i>Site Access West – Cobb Highway</i> <i>i.</i> <i>The design proposes that the side road centre line marking is skewed and does not appear to tie into the centreline of the proposed access, nor the existing side road. Please revised in updated TIA.</i> <i>ii.</i> <i>The design proposed that the side road give way to intersection line marking (TB and TB1) is to be installed in along the shoulder of the main line. This is incorrect. The C1 line marking should extend at this offset and the TB and TB1 line marking set back behind the AUL to allow a hazard free run out area.</i> <i>iii.</i> <i>The design proposed that R2-6N no right turn signage be installed. Is this signage intended for all vehicle movements for both the development access and the existing access arrangements. Please clarify if it is intended to restrict right turn movements during construction only.</i>	Strategic Designs as requested by TfNSW have been prepared and appended to the updated TIA. <i>Note the strategic concept design has been updated for the site access intersection with the Riverina Highway.</i> <i>No site access is proposed to the Cobb Highway.</i>

	iv. <i>Full swept paths of all turning movements are required.</i> v. <i>The swept paths show a conforming left turn movement. Is the left turn movement able to be undertaken with a vehicle store in the through lane? Centrelink marking needs to be demonstrated.</i>	
Safe Intersection Sight Distance	<i>SISD is be calculated from the posted speed plus 10km/h as noted on the previous letter. Posted speed is 100km/h therefore a required to be calculated at 110km/h. Please review e to h from the previous letter and provide response in the updated TIA.</i>	The updated TIA has re-calculated SISDs in accordance with the nominated speeds. The results show that the required sight distance is provided, meeting the SISD requirement for the 5.0 metre offset stipulated in Section 3.2.2 of <i>Austroads Guide to Road Design Part 4A: Unsignalised and Signalised Intersections</i>.
Existing Site Access	<i>Table 4 includes an error and does not make clear this has been addressed. Update the TIA to included clarification.</i> <i>Section 4.7.3.4 includes detail on the rural property accesses. Further mitigation measures are required to be detailed to reduce safety concerns.</i>	Table 4 has been amended in TIA for clarity. The Applicant has engaged with the adjacent neighbour regarding their typical daily movements and use of their rural farm property access. This engagement revealed daily traffic volumes of 20 inbound trips and 20 outbound trips associated with residents and the small on-site business. These movements are spread across the day and are considered negligible from a traffic impact perspective. Notwithstanding, the mitigation measures established in the strategic concept design include the provision of Give Way signage in accordance with Australian Standard 1742.2-2022 <i>Manual of uniform traffic control devices Part 2: Traffic control devices for general use</i>.
Bridge Construction	<i>Section 3.3 confirms that two-way movement over the bridge is possible however swept paths does not demonstrate simultaneous movement over the bridge. The proponent is to clarify and provide updated swept paths.</i>	The proposed culvert between the Riverina Highway and the site is approximately 6 metres wide, allowing a two-way functionality for light vehicles. As per the swept path assessment presented in the updated TIA the width allows only one-way movement for B-Double vehicles.
Transmission Line Crossing Over the Riverina Highway	<i>The concept designs in Appendix C need to demonstrate the location of infrastructure and impacts (excavation or fill) relative to the road reserve, including demarcation of local and state classified road reserves. Exact measurements of all</i>	Strategic Designs have been completed and appended in the updated TIA, with consideration to the fill and clearances of the transmission line.

required clearances need to be shown on the plans.

The TIA notes that this level of information is not available at the planning approval stage. TfNSW requires this information to be demonstrated on the strategic plans prior to determination.

The proponent is to clarify if a new access is required to construct and maintain the infrastructure. Access points or access tracks will need detailed traffic, turn warrant assessment and strategic concept designs (accompanied by swept path analysis of the largest heavy vehicle that can turn concurrently and an SISD assessment that demonstrates compliant SISD can be achieved.

The proponent notes they will use the existing accesses for construction of transmission line works. Each access required for the project is to be assessed for suitability to the standard outlined in the SEARs. Please ensure this is captured in the updated TIA.

There are no new or additional accesses into the TransGrid Substation required related to the construction of the transmission line over the Riverina Highway. Swept paths have been provided in the updated TIA that confirm that, subject to the proposed driveway upgrades, the project can safely accommodate all the required vehicles into the TransGrid Substation.

It has been assessed that up to one inbound and one outbound movement are expected at each access point in any given hour.

These levels of traffic generation do not warrant further assessment. The SISD available at the existing rural property access point on the southern side of the Riverina Highway is excellent and exceeds the requirement of 367 metres specified under *Austroads Guide to Road Design, Part 4A, Unsignalised and Signalised intersections*.

Nevertheless, the transmission line works will not be undertaken until the TransGrid Substation site access point is upgraded to a BAR in alignment with the assessment in the updated TIA. In addition, the BESS site access, which will be used to construct the northernmost pylon, will be upgraded to include an AUL deceleration lane in accordance with the Strategic Design.

On this basis the proposed transmission line connection works will result in no operational or safety impacts on the Riverina Highway or surrounding road network.

Port of Melbourne Route

Bridge and culvert assessments are required for the route. For TfNSW assets the proponent can contact TfNSW Special Permits Unit (see advisory note 7). The route assessment is to be revised based on the outcomes of the TfNSW bridge and culvert assessments.

The Concept Route Assessment has been revised following consultation with TfNSW and appended in the updated TIA.

Bridge assessments must be provided as appendix to the TIA.

The pull-over bays and rest areas have been identified with swept paths. Please ensure the full dimensions are demonstrated on the updated plans.

2.6 DPHI

The following table provides clarification to queries raised during consultation with DPHI:

Topic	Comment	Applicant Response
Updated assessment to address consolidated Edward River LEP – electricity supply	<i>Provide further information regarding the electricity supply for the project in reference to the Edward River LEP</i>	The Applicant clarifies that all the electricity utilised during construction will be generated on-site with diesel generators. The fuel quantities have already been assessed in relation to the Preliminary Hazard Assessment (PHA) and are safe and within the current industry standards.
Development footprint	Clarification and confirmation of the development footprint	The Applicant wishes to reiterate the components of the project. As presented in the SSDA and assessed in the EIS, the schedule of lands within the development footprint includes: ▪ Lot 1 DP536901 ▪ Lot 11 DP856212 ▪ The land identified for road upgrades at the Riverina Highway for site access into Lot 1 DP536901 and as specified in the updated TIA. ▪ The land identified for road upgrades at the Riverina Highway for site access into Lot 11 DP856212 and as specified in the updated TIA. ▪ The road intersections located at: – Cobb Highway / Hardinge Street – Hardinge Street / Charlotte Street – Charlotte Street / Davidson Street The TransGrid compound had been identified within the EIS as part of the development footprint, and environmental assessments have been undertaken to assess potential impacts of the Project. However, the associated road upgrades are now proposed to be included as part of the project scope. This has necessitated the preparation of a separate Amendment Report, which will formally seek to include this limited scope as part of the SSDA. See Table 2 for a breakdown of the site area.

Transport Impact Assessment considerations	Clarifications on vehicle movement and trip terminologies, and their application across the TIA for consistency. Clarification on Heavy Vehicle definitions.	The definitions of ‘vehicle movement’ and ‘vehicle trip’ have been included in the glossary of this report as well as the TIA. The definition of High Risk-Heavy Vehicle Requiring Escort (HV-HVRES) is clarified within the TIA. The following clarifications on heavy vehicle movements and trips are noted during the liaison with DPHI: ▪ Daily: A maximum of 50 daily heavy vehicle (HV) movements during project construction ▪ Network AM peak hour (8:00 AM – 9:00 AM): A maximum of six (6) inbound heavy vehicle (HV) trips during project construction ▪ Network PM peak hour (4:15 PM – 5:15 PM): Zero (0) heavy vehicle (HV) movements during project construction ▪ Across other construction hours: a maximum of six (6) heavy vehicle (HV) movements during project construction These limits apply specifically to the BESS construction and exclude pre-construction minor works.
Operational Life	Confirm the operational life of the project and when refurbishments may be required.	The operational life of the project is predicted to be 20 years, as confirmed with Council in the letter of offer. Refurbishments will need to be completed on an ad hoc basis and subject to operational requirements; thus, it is not possible to predict their frequency at this stage.
Bushfire Mitigation requirements	Confirm the applicant is committing to manage the entire 38m to north, 10 metres to the east, 13 metres to the south and 35 metres to the west as fire breaks	The Applicant confirms commitment to the maintenance of the boundaries as described as Assets Protection Zones (APZs). This meets the minimum requirements in the <i>Planning for Bushfire Protection 2019 guidelines</i> and as assessed in the EIS, which prescribe a minimum width of 10 metres.
Visual Impact and Landscape	Clarification is sought in relation to the typologies of the landscape buffers, as well as a provision of the cumulative visual impacts.	The Southern boundary will be 7m only. Any mention in the body of the Landscape Report referencing 4m for the southern boundary is a typo. Cumulative visual impacts are considered negligible and do not necessitate further assessment. The central components of the project and the adjacent Deniliquin BESS will be completely screened from the public domain with landscape buffers. The only remaining infrastructure unable to be screened will be the proposed transmission line. Notwithstanding, noting the Deniliquin BESS only proposes an underground connection, there is no potential for this item to induce any cumulative visual impact further to what has already been assessed in our VIA.
Clarifications on the Noise Impact Assessment and	Clarification is sought in relation to the duration of the construction	The Applicant has provided the following indicative timeframes during the construction stage:

mitigation measures	activities and whether Table 7.3 of the Noise and Vibration Impact Assessment (NVIA) represents the final predicted operational noise levels and if the noise wall will be part of the final detailed design.	▪ Vegetation Clearance: 1 week ▪ Access and Earthworks: 18 weeks total (Main Access Track: 5 weeks; Bulk Earthworks: 13 weeks) ▪ Foundations and Pads: 23 weeks total, works concurrent: (BESS Feeders: 5–7 weeks each; Major Transformer: 9 weeks; Substation: 10 weeks) ▪ Equipment Installation: 13 weeks total (BESS Components: ~1 week per feeder; Substation Transformer: 5 weeks; O&M Building: 4 weeks; Control Building: 1 week) ▪ Demobilisation/Rehabilitation: Unconfirmed at this stage. For the purpose of evaluation, an indicative timeframe of 15 to 20 weeks could be appropriate. The Applicant also confirms that Table 7.3 of the NVIA assesses final predicted operational noise levels subject to all mitigation measures, of which the noise wall will be part of. Therefore, the noise wall will indeed be part of the final detailed design.
Dust Mitigation	Clarification on the extent to which dust mitigation is warranted.	The Applicant notes that water utilised for dust mitigation refers to cleaning purposes and during construction only. There will be no significant impacts arising from this issue; therefore, an ad hoc approach to its management will be proposed as part of a final CEMP.
Aboriginal Cultural Heritage Assessment	Clarification on the coverage of the ACHAR subject area and the development footprint	The ACHAR 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.

For the avoidance of doubt, the following Table 2 includes a comparison of the assessed project area originally in the EIS and in this Amendment Report.

Table 2 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.

3 Conclusion

The RFI issued by DPHI dated 9 March 2026 raised a number of issues, including servicing and commissioning, traffic impacts, and updates to the BDAR. The RFI was issued by DPHI under section 36 of the EP&A Regulations.

Representatives of the Applicant and its consultant team met with DPHI, Murray Irrigation, Edward River Council and TfNSW in meetings between March and May 2026 to discuss the scope of the additional information sought and to agree on practical resolutions.

This Report and the associated technical reports present a comprehensive response to the RFI request and should be read together. The following updated technical reports have been submitted to address the RFI:

- Updated BDAR
- Updated TIA, including Strategic Concept Designs.

This Report and the appended technical reports respond to the RFI, demonstrate that the project will not result in any unacceptable adverse environmental impact. In this regard, the proposed works are consistent with the EP&A objectives.

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