

Megan Ramsdale

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BY EMAIL

3 September 2025

Dear Megan,

**Proposed State Significant Development Hume North Battery Energy Storage System (BESS) –
32 Trout Farm Road, Lake Hume Village**

In December 2024, AlburyCity lodged a submission to the Department of Planning, Housing and Infrastructure via the NSW Major Project Planning Portal in response to the proposed 74MW/148Mwh BESS. The following issues were raised:

- Visual Impact;
- Noise impact to adjacent residential properties;
- Risk Management – specifically Drinking Water Quality Risk;
- Water Demand;
- Environment;
- Social Impact.

An amended proposal has been referred to AlburyCity for comment.

The proposed amendments to address the above issues are outlined in the Amendment Proposal Report prepared by Jacobs dated 8 August 2025. It is noted that detailed plans have not been provided and therefore the following comments and observations are limited to the information provided.

Drinking Water Quality Risk

Significant concerns remain about the location of the proposed development, in close proximity to the region's drinking water supply. The Updated Preliminary Hazards Analysis, prepared by Planager, dated 5 May 2025, evaluates the potential impacts of contaminated runoff on the water

quality of the Murray River, which supplies drinking water to the region. However, the analysis does not adequately address the protection of drinking water quality. Council recommends the Updated Preliminary Hazards report be independently peer reviewed by a suitably qualified risk management expert.

Should the consent authority be satisfied that the risks to drinking water quality of the Murray River are acceptable and decide to grant approval, the following conditions are recommended for inclusion in any consent issued:

- The existing consent for 20MW/40Mwh BESS at 62 Murray Street, Lake Hume Village must be surrendered.
- Confirm the proponent's commitment to delivering community benefits through a formal agreement with AlburyCity.
- All outdoor and security lighting must be designed to minimise light pollution, in accordance with Australian Standard 4282 and National Light Pollution Guidelines for Wildlife, (May 2023, Version 2.0).
- Barbed wire fence is only permitted where it is a security requirement (such as AS/NZS 2067 or Critical Infrastructure Resilience Strategy (Department of Home Affairs, 2023)). Where barbed wire must be installed, additional mitigation measures must be implemented to reduce risk to Squirrel Gliders and other fauna, including:
 - lowering the fence to the minimum height required to maintain security but aiming to avoid high barriers for gliders,
 - the use of smooth wire or plain wire on the top strand of fencing,
 - installation of wildlife-friendly fencing designs that allow safe movement, and visibility enhancements.
 - regular monitoring of fence lines to be undertaken to identify and respond to any wildlife entanglement incidents.
- The implementation of recommendations contained within the supporting technical reports prepared by Jacobs Group Pty Ltd, dated 17 July 2025;
 - Updated Biodiversity Assessment Report (BDAR)
 1. Construction Environmental Management Plan (CEMP)
 2. Project Environmental Management Strategy
 - Updated Noise and Vibration Impact Assessment report
- Lodging the following construction management plans to the satisfaction of the consent authority:
 - Erosion and Sediment Control Plan
 - Construction Management Plan and
 - Stormwater Management Plan.

Please note that a section 138 Road Opening Permit must be obtained from Council prior to undertaking any works within the road reserve. The precise location of critical infrastructure must be verified, and a detailed longitudinal section of the proposed road over the Hume Wastewater Treatment Plant discharge submitted. This section must clearly show the location and extent of cut and fill over the sewer main and include consideration of the existing manhole, to the satisfaction of AlburyCity Water Authority. Refer to the '*Guidelines for Building near AlburyCity Water and Wastewater Assets*'.

If you have any queries about the matters raised, please contact me on 0400 485 429 or at david.christy@alburycity.nsw.gov.au

Regards,



David Christy
Acting Deputy CEO
Infrastructure, Planning and Environment