

Prepared for Samsung C&T Renewable Energy Australia

Submissions Report

South Coree Battery Energy Storage System

Berrigan Shire, Finley, NSW

May 2026

Project Number: 251103

Submissions Report

South Coree Battery Energy Storage System



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Acronyms and Abbreviations

AR	Amendment Report
BAM	Biodiversity Assessment Method
BAL	Basic Left Treatment
BAR	Basic Right Treatment
BDAR	Biodiversity Development Assessment Report
BESS	Battery Energy Storage System
BSC	Berrigan Shire Council
DA	Development Application
DPHI	Department of Planning, Housing and Infrastructure (NSW) (formerly DPE)
EIS	Environmental impact statement
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (NSW)
ha	hectares
LFP	Lithium-iron phosphate
LGA	Local government area
m	metres
MW	Megawatt
NEM	National Energy Market
PCT	Plant Community Type
PHA	Preliminary Hazards Assessment
RAP	Registered Aboriginal Party
SEPP	State Environmental Planning Policy
SIG	Special Interest Group
SSD	State Significant Development
SR	Submissions Report
TfNSW	Transport for NSW
VPA	Voluntary planning Agreement

Terms used in this report

South Coree Battery Energy Storage System	The development, construction, operation and decommissioning of an up to 80 MW / 320 MWh (4hr) Battery Energy Storage System (BESS), generally comprising of battery storage units, transformers, access roads, underground and above ground cables, onsite substation and associated operational facilities.
Maximum energy discharge capacity	The rated output active power is around 86 MW
Maximum energy storage capacity	The effective energy storage capacity at the beginning of service life is around 345 MWh
The Project	South Coree Battery Energy Storage System
The Applicant	Samsung C&T Renewable Energy Australia Pty Ltd (SREA) on behalf of: South Coree BESS as Trustee for South Coree Pty Ltd
Involved Lands	All lots and road reserves that are intersected by the Project Site
Subject Lot	The lot of the associated receiver who would host the battery. This lot is Lot 4 DP740920
Project Site	The area of land that is being investigated for siting of the Project.
Development Footprint	The area that would be impacted directly by the Project (including temporary construction impacts). In total the Development Footprint covers an area of approximately 11.46ha (including proposed works at the Riverina Highway/Canalla Road intersection).
Indicative Layout	The Indicative Layout refers to the current concept layout of the Project that is presented in the Project Description
Associated receiver	A receiver on privately-owned land in respect of which the owner has reached an agreement with the Applicant in relation to the development and management of impacts. They are considered 'Project associated'.
Non-associated receiver	A residence on privately-owned land in respect of which the owner has not reached an agreement with the applicant in relation to the development. or A residence on privately-owned land in respect of which the owner has reached an agreement with the applicant in relation to the development, but the agreement

	does not cover the relevant impact or the performance measure for such impact under that agreement has been exceeded. Non-associated receivers are fully assessed for all environmental impacts, such as noise, vibration and visual impacts.
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Executive summary

Background

Samsung C&T Renewable Energy Australia (SREA) on behalf of South Coree BESS as Trustee for South Coree Pty Ltd (The Applicant) proposes to develop the South Coree Battery Energy Storage System (BESS) located at **384 Broockmanns Road, Finley NSW 2713**. The BESS would be connected to the nearby Transgrid Finley 132kV substation.

The main objective of the BESS is to store excess energy from the market and redistribute this energy during times of lower energy production to firm supply and meet the energy needs of the community. The capacity of the BESS at the point of connection is approximately 80 Megawatts (MW) / 320MWh (80MWh x 4 hours).

The Environmental Impact Statement (EIS) included in the Project's statutory context and information required to assess its potential economic, environmental and social impacts.

The key environmental impacts investigated in the EIS were:

- Biodiversity
- Aboriginal heritage
- Access and traffic
- Hazards and risk
- Visual amenity
- Noise and vibration
- Water resources and flooding
- Land use compatibility
- Social and economic.

The EIS was placed on public exhibition from 7 November until 5 December 2025.

[South Coree Battery Energy Storage System | Planning Portal - Department of Planning and Environment](#)

Community and agency submissions to the EIS

During the EIS public exhibition period, submissions from the public, public authorities and other interested parties in relation to the Project were invited to comment. Submissions opposing the Project most frequently cited contamination concerns followed by land use and water quality issues linked to potential contamination. The number of submissions raised are summarised below.

Public and Special Interest Group (SIG) submissions (63 total):

- 51 public objections of the Project
- 11 objections from special interest groups (including one double up submission)
- 1 comment from a public organisation

Agencies providing comments

- Department of Planning, Housing and Infrastructure (DPHI)
- Conservation Programs, Heritage and Regulation Group (CPHR)
- DPHI – Hazards
- Department of Primary Industries and Regional Development (DPI) – Agriculture
- Fire and Rescue NSW (FRNSW)
- Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Water Group
- NSW State Emergency Services (NSW SES)

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- NSW Rural Fire Service (RFS)
- Transport for NSW (TfNSW)
- Water NSW
- Transgrid

Agencies providing no comment

- Crown Lands
- DPI – Fisheries
- DPI – NSW Resources
- Heritage NSW – Aboriginal Cultural Heritage
- Heritage NSW – Historic Heritage
- Murray-Darling Basin Authority

Council and organisation submissions

- Berrigan Shire Council
- Edward River Council
- Murray Irrigation.

Of the 63 public, special interest groups (SIG) and organisation submissions received, one comment was received locally by Murray Irrigation within 100 km of the Project Site (1.6%). The remaining 62 submissions were in objection and located greater than 100km from the Project Site (98.4%). Those located more than 100km from the site are unlikely to be directly or indirectly impacted by the Project

This Submission report has been prepared to analyse the issues raised in public, SIG, organisation and government agency submissions and explain what actions the Applicant has taken since the EIS was publicly exhibited in relation to them.

Project amendments

The proposed amendments are summarised below:

- Extension of Development Footprint to the southern boundary of Lot B DP961693, to encompass future potential 132kV underground cable connection and bench extension
- Greater Intersection treatment than existing at the intersection of Canalla Road, Marantellis Road and the Riverina Highway, to support construction vehicles
- Decrease in light traffic requirements, facilitated by the use of shuttle busses
- Design refinements to increase the separation distances between battery units
- Committed to the construction of the noise wall.

The proposed amendments have resulted in an increase of Development Footprint, from 9.37ha to 11.46ha. As a result, credit obligations have increased based on the assumption of presence due to lack of survey in suitable survey periods.

Overall justification for the Project

The Project as presented in the EIS meets all relevant planning provisions and guidelines and is considered justifiable and acceptable. On balance, the Project is considered appropriate to both:

- The Site's location, being located within close proximity to an existing substation and is nearby the South West REZ

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- The Site's environmental values and the values identified by the local and broader community; impacts have generally been assessed as low, and mitigation strategies with high confidence have been adopted in consultation with potentially impacted landholders to manage residual risks.

The Project has been demonstrated to be:

- In accordance with the relevant assessment guidelines
- Responsive to local matters
- Significant in terms of local economic benefits
- Important in the renewable energy sector.

1. Introduction

1.1. Location and Project outline

Samsung C&T Renewable Energy Australia Pty Ltd on behalf of South Coree BESS Pty Ltd as Trustee for South Coree BESS Trust (The Applicant) is proposing the development of the South Coree Battery Energy Storage System (The Project). The Project would involve the construction, operation and decommissioning of a Battery Energy Storage System (BESS) with a capacity of up to approximately 80 Megawatts (MW) / 320MWh (80MWh x 4hr) at the point of connection. It would supply electricity to the National Electricity Market (NEM) during peak periods.

The Project is located at **384 Broockmanns Road** approximately 39.2 km south southeast of the nominated South-West Renewable Energy Zone (SWREZ), and approximately 5km west of the township of Finley (NSW). It is located within a land parcel that is adjacent to an existing 66 kilovolt (kV) line and in proximity to the Finley Substation and Finley Solar Farm. The immediate area consists of broadscale irrigated areas with irrigation water supplied via the Mulwala Canal.

A new site access would be constructed from Broockmanns Road on the western side of the Project. The design and construction of the new site access will be undertaken in consultation with Berrigan Shire Council.

Construction of the Project would occur over approximately 12 months limited to Monday to Friday 7am to 6pm, Saturday 8am to 3pm and no work on Sunday's or public holidays. The expected operation life of the Project is approximately 35 years with refurbishment at 20 years. The Project would primarily be operated remotely with two full time staff undertaking periodic site maintenance.

The proposed access and haulage routes are currently utilised for heavy vehicle movements and uses B-Double approved roads.

Access to the existing Transgrid substation is also required. The Transgrid substation lot, transmission route and access point has been assessed as part of the EIS.

1.2. Applicant details

The Project is being developed by Samsung C&T Renewable Energy Australia Pty Ltd on behalf of South Coree BESS Pty Ltd as trustee for South Coree BESS Trust (The Applicant) (refer to Table 1-1).

Samsung C&T Renewable Energy Australia Pty Ltd (SREA) began operations in Australia in 2022 and has solar and storage project interests across New South Wales, Victoria, and Queensland.

Table 1-1 Applicant Details

Applicant Details	Detail
The Applicant	South Coree BESS Pty Ltd as trustee for South Coree BESS Trust
Office Address	Suite 8.04, Level 8 227 Elizabeth Street Sydney, 2000

Applicant Details	Detail
ABN	19 311239 640
ACN	684 502 805

1.3. EIS preparation and exhibition

The South Coree BESS Environmental Impact Statement (EIS) was prepared in accordance with the Project Specific Secretary's Environmental Assessment Requirements (SEARs), the State Significant Development Guidelines (DPHI, 2024a) (the Guideline) and Appendix B to the Guideline – Preparing and Environmental Impact Statement (DPHI, 2022). The key environmental issues investigated in the EIS were biodiversity, Aboriginal heritage, access and traffic, hazards, visual amenity, noise and vibration, water resources and flooding, land use compatibility, and social and economic. Cumulative impacts were considered relevant to many of these areas. Detailed safeguards and mitigation measures were developed and included as commitments of the Project.

The Project EIS and supporting appendices was placed on public exhibition from 7 November until 5 December 2025.

[South Coree Battery Energy Storage System | Planning Portal - Department of Planning and Environment](#)

During this time, members of the public, Special Interest Groups (SIG), organisations and government agencies were invited to review the proposal and its assessment of impacts in full and make submissions.

1.4. Relationship to other activities

1.4.1. Land ownership, use, agreements and subdivision

The Applicant would lease part of Lot 4 DP 740920 (freehold land) from the primary landholder for the life of the Project. Electrical substations are treated as premises rather than fixtures due to the substantial and permanent nature of their construction. As such, subdivision may not be required for the Project.

If subdivision is required to create a separate allotment for the Project substation (subject to the utility provider requirements), the size and configuration would be confirmed in consultation with Transgrid and the host landowner.

For the purpose of flexibility, Development Consent for subdivision is being sought.

1.4.2. Connection to electricity network

Electrical connection from the BESS to the Transgrid Finley Substation would be via an approximately 900m, 132 kV transmission cable. Both above and below ground options were presented in the EIS. However; It is expected that the connection would be underground on the southern side of Broockmanns Road, with the easement confined to the Broockmanns Road and Canalla Road corridors. Some sections of the final connection route may be overhead, particularly within and near the existing Transgrid Finley substation.

1.4.3. Restrictions applicable to the site

There is a 10m wide easement to drain water located at the southern boundary of the Project Site (burdening Lot 4, benefitting Lot 3), adjacent to the property boundary fence (and Broockmanns Road). Construction for the access will not impact the function of the drain or easement, and it will be designed in with best practice to maintain its integrity and current function.

1.5. This report

This Submission Report has been prepared to analyse the issues raised in public and government agency submissions and explain what actions the Applicant has taken since the EIS was publicly exhibited to address submissions. It includes a

- Specific response to each issue raised¹ in the public submissions; and
- Specific response to each government agency issue raised.

The report is guided by the Appendix C to the guidelines – preparing a submissions report (DPHI, 2024b) and is structured as follows:

- Chapter 2 summarises the submissions received
- Chapter 3 summarises the actions taken by the Applicant since public exhibition of the EIS
- Chapter 4 details the Applicant's response to public and special interest group submissions
- Chapter 5 details the Applicant's responses to agencies, councils and organisations
- Chapter 6 details updated mitigation measures
- Chapter 7 details the project justification.

Appendices include:

- A. Submission register to identify where each submission received is addressed in this report. The submission ID can be used to search responses that reference this submission number
- B. An updated consolidated table of mitigation measures that form commitments of the Project, pending Project approval
- C. Updated layout plans
- D. Specialist studies:
 1. Accommodation inventory (Appendix D.1)
 2. Preliminary Hazards Assessment (Appendix D.2)
 3. Biodiversity Development Assessment Report (Appendix D.3)
 4. Flood Impact Assessment (Appendix D.4)
 5. Traffic Impact Assessment (Appendix D.5)

1.5.1. Amendment Report

An Amendment Report is relevant to the Project, and has been prepared concurrent with this Submissions Report. The proposed amendments to the Project involve an increase in the Development Footprint, to support Transgrid enabling works within their substation, amendments to the Riverina Highway / Canalla Road / Marantellis Road intersection in response to Transport for NSW (TfNSW), and minor Indicative Layout refinement to address the Department of Planning, Infrastructure and Housing (DPHI) – Hazards Team concerns on separation distances:

¹ Each issue raised in public submissions is addressed in this report, not each public submission individually. A cross-reference table is provided in Appendix A so that the response to each submission can be tracked.

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- Extension of Development Footprint to the southern boundary of Lot B DP961693, to encompass future potential 132kV underground cable connection and bench extension
- Greater intersection treatment at the s of Canalla Road, Marantellis Road and the Riverina Highway, to support construction vehicles
- Decrease in light traffic requirements, accommodated by the use of shuttle busses
- Design refinements to increase the separation distances between battery units
- Committed to the construction of the noise wall..

The proposed amendments have resulted in an increase of Development Footprint, from 9.37ha to 11.46ha. As a result, credit obligations have increased as follows:

Offset Entity	Credit obligation
PCT 76: Inland Grey Box Woodland	24+16
Southern Myotis (<i>Myotis macropus</i>)	25+15
Sloane's Froglet (<i>Crinia sloanei</i>)	+13
Spear Grass (<i>Austrostipa wakoolica</i>)	+21
Slender Darling Pea (<i>Swainsona murrayana</i>)	+9
Silky Swainson-pea (<i>Swainsona sericea</i>)	+9

Additional credit obligation for all fauna and flora (excluding PCT 76) are based on the assumption of presence, due to lack of survey in suitable survey periods.

Justification of amendments

The proposed amendments are not a result of the public submissions received on the EIS, rather a result of additional consultation by the Applicant with Transgrid, and additional TfNSW and DPHI – Hazards Team requirements. These amendments are covered in detail within the Amendment Report.

The Amendment Report concludes there are no major increase in impact, and the project remains consistent with the findings of the EIS. It meets all relevant planning provisions and guidelines and is considered justifiable and acceptable.

Figure 1-1 and Figure 1-2 illustrate the amended Indicative Layout and Development Footprint compared to the EIS submission.

Ref: 240316 South Core BESS Planning_RTS_20217 \ Figure 1-1 Project as amended Author: Sarah Hillis Date created: 17.02.2026 © NGH 2026



Datum: GDA2020 / MGA Zone 55



South Core BESS
Figure 1-1 Project as amended

Ref: 240316 South Core BESS Planning_RTS_20217 \ Figure 1-2 Development Footprint from EIS to RTS Author: Sarah Hillis Date created: 18.02.2026 © NGH 2026



South Core BESS

Figure 1-2 Development Footprint from EIS to RTS

2. Analysis of submissions

2.1. Breakdown of submissions

Submissions were received from agencies, council, special interest groups (SIG), organisations and the public individuals. Table 2-1 below summarises the submissions made to the Project.

As the Project received more than 50 unique objections, the Project is required to be referred to the Independent Planning Commission (IPC).

Table 2-1 Breakdown of submissions

Group	Submissions	Total
Public:	51 objections	51
Special interest groups:	- Save Our Surroundings – Barham - Save Our Surroundings – Moulamein - Save Our Surroundings – Swan Hill - Save Our Surroundings – Callide - Save Our Surroundings – Hay - Save Our Surroundings – Romsey - Save Our Surroundings – Redbank Plains - Save Our Surroundings – Murrumbidgee x 2 - Save Our Surroundings – Riverina - Save Our Surroundings – Lancefield	11
Organisations	Murray Irrigation	1
Public agencies providing comments:	- Department of Planning, Housing and Infrastructure (DPHI) - DPHI – Hazards - Conservation Programs, Heritage and Regulation Group (CPHR) - Department of Primary Industries and Regional Development (DPI) – Agriculture - Fire and Rescue NSW (FRNSW) - Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Water Group - NSW State Emergency Services (NSW SES) - NSW Rural Fire Service (RFS) - Transport for NSW (TfNSW) - Water NSW - Transgrid	11
Public agencies providing ‘no comments’	- Crown Lands - DPI – Fisheries - DPI – NSW Resources - Heritage NSW – Aboriginal Cultural Heritage	6

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	- Heritage NSW – Historic Heritage - Murray–Darling Basin Authority	
Councils:	- Berrigan Shire Council - Edward River Council	2

2.2. Spatial distribution of submissions

The spatial distribution of public, SIG and organisation submissions was wide, with submissions received from NSW, Victoria and Queensland (Table 2-2). Of the 63 public, SIG and organisation submissions received, one comment was received locally by Murray Irrigation within 100 km of the Project Site (1.6%). The remaining 62 submissions were in objection and located greater than 100km from the Project Site (98.4%). Those located more than 100km from the site are unlikely to be directly or indirectly impacted by the Project.

The distribution of public, SIG and organisation submissions can be seen in Table 2-4 and Figure 2-1 below.

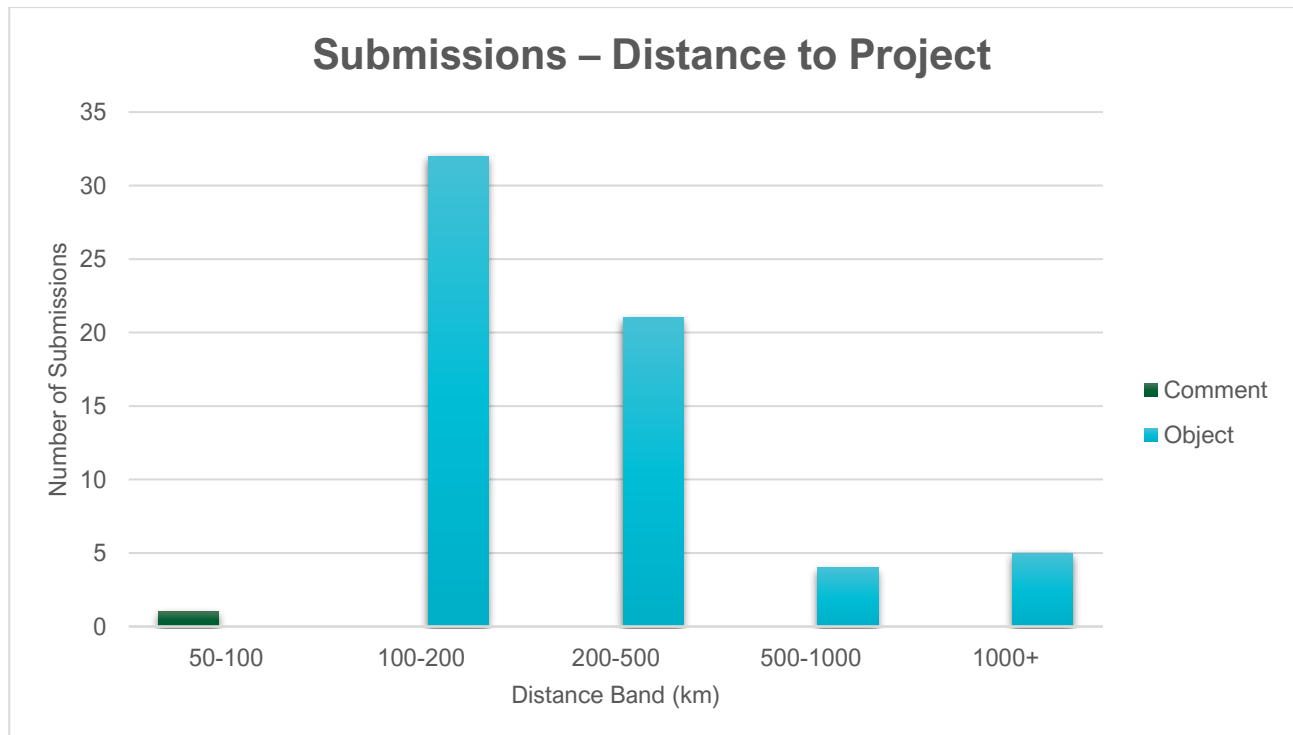
Table 2-2 Distribution of submissions by State

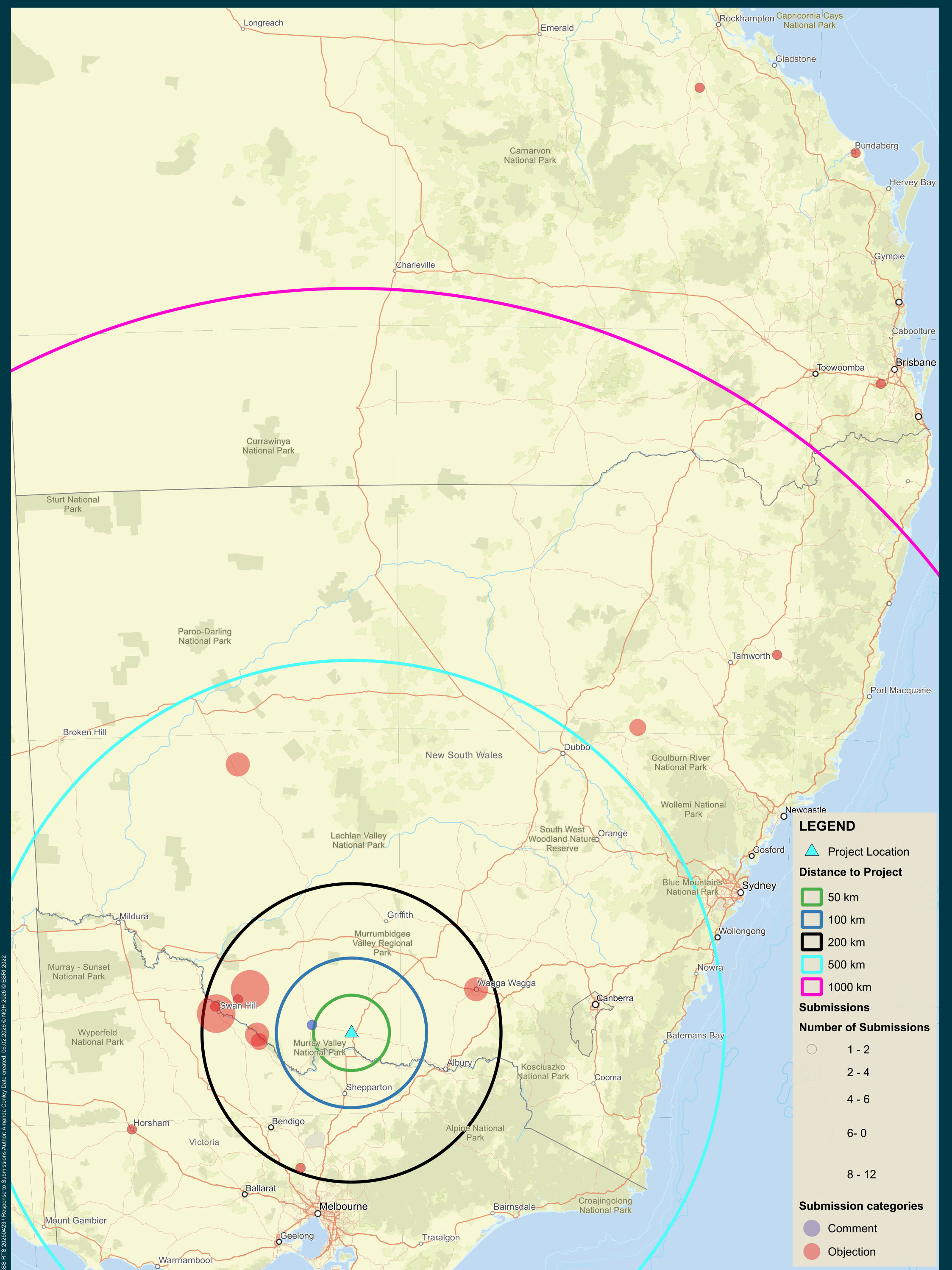
State	Count	%Total
New South Wales	41	65%
Queensland	5	8%
Victoria	17	27%

Table 2-3 Distribution of submissions by distance

Distance from Project	Count	%Total
0-50	0	0%
50-100	1	1.6%
100-200	32	51%
200-500	21	33%
500-1000	4	6.4%
1000+	5	8.0%

Table 2-4 Distribution of submissions by distance





Datum: GDA2020 / MGA Zone 55

2.3. Categorisation of issues raised in submissions

Twenty-seven separate issues were identified from the public and SIG in 21 suburbs across NSW, Qld and Vic (refer Figure 2-1). Their prevalence has been ranked (noting comments as well as objections) in Figure 2-2. Most submissions raised more than one issue in relation to the Project.

The key reason cited in objections was potential hazards. This was linked in many cases to contamination concerns.

The number of public submissions is also categorised by the Department of Planning, Housing and Infrastructure (DPHI) guideline category requirements in Figure 2-2 and Table 2-5. This categorisation is used in Section 4 to respond to each issue raised.

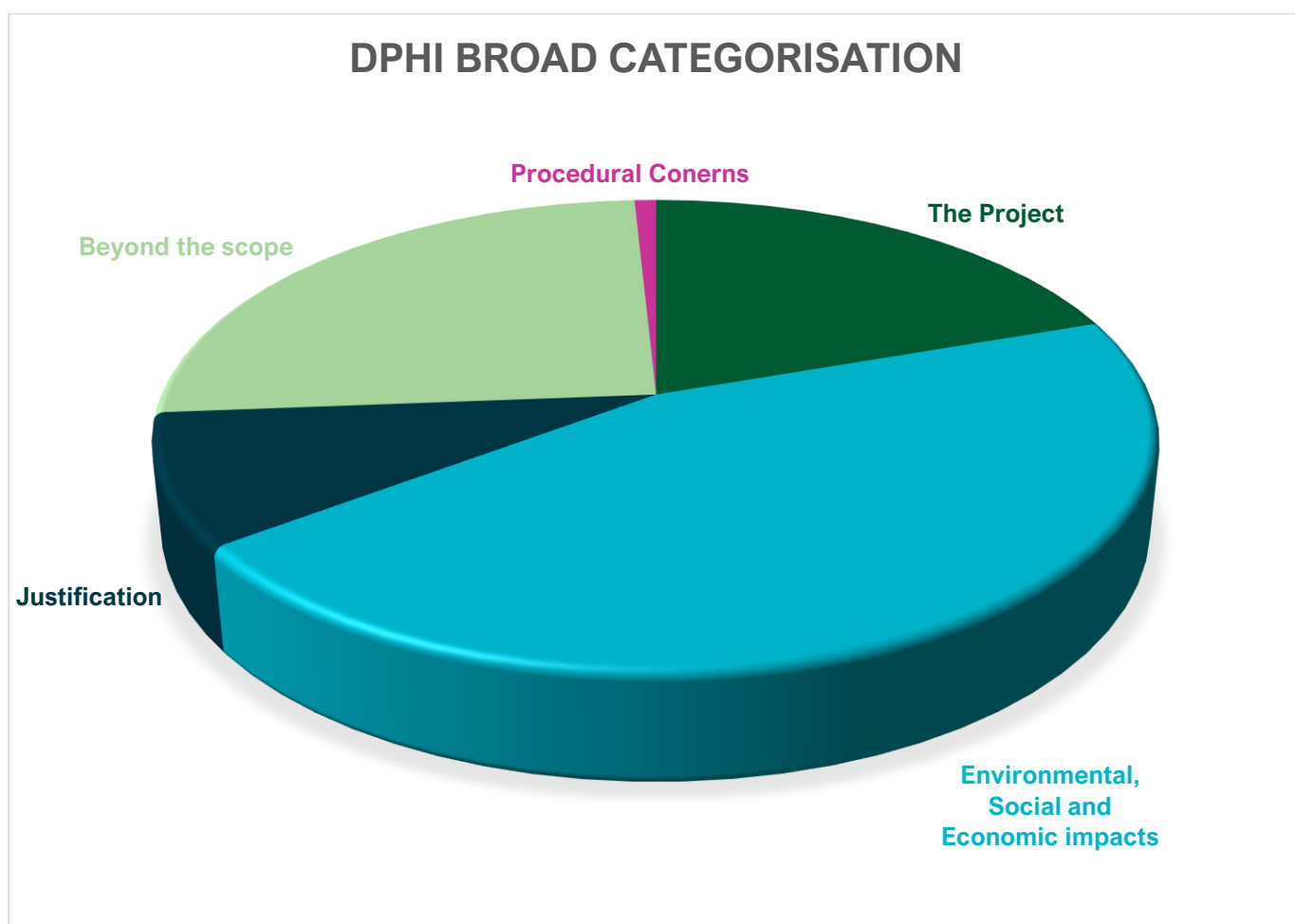


Figure 2-2 Issues raised from public submissions

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Table 2-5 Issues raised in public submissions categorised by DPHI guideline category and prevalence

Category	Issue category	Issue	Issue count	Prevalence	Section addressed
The Project itself	Location	Located near Mulwala Canal and existing farmland	9	15	Section 4.1.1
		Located in the “Riverina Food bowl”	16	4	Section 4.1.1
Procedural concerns	Biodiversity assessment	Survey inadequacy	1	27	Section 4.2.1
Environmental, social and economic impacts	Hazards and Risks	Contamination	38	1	Section 4.3.1
		Fire / explosion	22	2	
		Toxic waste	14	6	
		PFAS/BIFAS	10	14	
		Heavy metals	9	16	
	Land, water and land use	Agricultural land use	21	3	Section 4.3.2
		Water quality	17	7	
		Soil degradation	15	5	
		Water use	3	22	
	Socio-economic	Cost of electricity	13	12	Section 4.3.3
		Modern day slavery	2	26	

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Category	Issue category	Issue	Issue count	Prevalence	Section addressed
		Human health and food security	14	8	
	Amenity	Air pollution	9	17	Section 4.3.4
		Noise	6	19	
	Waste and decommissioning	Decommissioning	6	20	Section 4.3.5
		Waste	3	23	
	Biodiversity	Flora and fauna	12	13	Section 4.3.6
	Traffic	Road dilapidation and safety	6	21	Section 4.3.7
Justification	Grid stability	Grid stability	14	9	Section 4.4.1
Beyond the scope of the Project	Foreign ownership	Foreign ownership	14	10	Section 4.5.1
	Unrelated projects	Unrelated Projects	9	18	Section 4.5.2
	Government Policy	Net Zero	4	24	Section 4.5.3
	Funding	Use of public funds	3	25	Section 4.5.4

3. Actions taken since public exhibition

3.1. Amendments to the project

As detailed in Section 1.5.1, minor amendments have been made to support Transgrid enabling works within their substation, amendments to the Riverina Highway / Canalla Road / Marantellis intersection in response to TfNSW, and minor Indicative Layout refinement to address the DPHI – Hazards Team concerns on separation distances.

The proposed amendments have resulted in an increase of the Development Footprint by 2.09ha, with minor increases to the credit obligations.

There is no major increase in other impacts.

As such, the amendments are justifiable. The proposed amendments are not a result of the public submissions received on the EIS, rather a result of additional consultation by the Applicant with Transgrid and additional TfNSW and DPHI - Hazards requirements. These amendments are covered in detail within the Amendment Report.

3.2. Consultation

During the preparation of the response to submissions, the following consultation was undertaken with agency stakeholders. Copies of relevant correspondence (where relevant) is included within the relevant Specialist Report in Appendix D.

3.2.1. Agencies and other stakeholders

During the preparation of the response to submissions, the following consultation was undertaken with agency stakeholders. Copies of relevant correspondence (where relevant) is included within the relevant Specialist report in Appendix D.

Agency stakeholder	Date	Consultation comments
Transgrid	05/12/2025	Transgrid requested the development footprint be extended further south to the southern boundary of its land parcel (Lot B DP961693) to encompass the 132kV underground cable connection and potential bench extension.
Essential Energy	10/12/2025	The Applicant received an in-principal agreement for 132kV transmission line connection along Broockmanns Road (proposed underground), encroaching into the essential energy easements.
TfNSW	12/02/2026	The Applicant, NGH and Amber facilitated a meeting with members from TfNSW, BSC and DPHI to discuss the proposed upgrade requirements to the Riverina Highway/Canalla Road/Marantellis Road intersection. Clarification was sought on the Finely BESS proposal, as not to

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Agency stakeholder	Date	Consultation comments
		over or under-scope the intersection treatment put forward for the Project. No resolution was made on the day of meeting. The OSOM route and conflict with the light-post was discussed with BSC and resolved.
TfNSW Special Permits Unity	06/02/2026	Amber requested guidance on the anticipated bridge and culvert assessment for the proposed OSOM route. Results are pending. The application was sent on 6 February 2026 and the assessment reference number is PT3076. Follow up emails have been sent in March and May and at the time of writing (19 May 2026) the assessment is yet to be provided.
Berrigan Shire Council (BSC)	12/02/2026	The Applicant, NGH and Amber facilitated a meeting with members from TfNSW, BSC and DPHI to discuss the proposed upgrade requirements to the Riverina Highway/Canalla Road/Marantellis Road intersection. See above for further detail. In addition to the above, Council confirmed they had no issue with the use of B-doubles on Canalla Road.
	07/01/2026 – 16/03/2026	The Applicant reached out to BSC in January 2026, to seek feedback on the proposed Voluntary Planning Agreement (VPA) following the October 2025 Ordinary Council Meeting. BSC noted that the VPA was consistent with the Council's definitions, and if successful financial contributions would be implemented similar to the Council Small Business Grant Program. The formal VPA was sent by the Applicant in February 2026, with minor amendments suggested. Following this, the VPA was accepted March 16, 2026.
	11/03/2026	Council provided an updated Letter of Consent to lodge the Development Application to the Applicant, which included the proposed intersection upgrade with the Riverina Highway/Canalla Road/Marantellis Road.
	27/03/2026	Council confirmed water supply via standpipe or private service supplier, should the Mulwala Canal shutdown period impact construction water supply.

Submissions Report

South Coree Battery Energy Storage System

Agency stakeholder	Date	Consultation comments
Murray Irrigation	25/03/2026	Murray Irrigation had confirmed in the EIS, and again on 25 March 2026, that they could supply the water in principal, subject to formal application, operational review, and approval closer to the required supply date. The Engineering, Procurement and Construction (EPC) contractor would be required to comply with the Murray Irrigation Works Policy for water access. See Section 5.2.3 for further detail on consultation outcomes.
CPHR/BOS Helpdesk	06/02/2026	NGH reached out to CPHR and the BOS Helpdesk to confirm habitat suitability and species excluded from the BAM-C. A response from the BOS Helpdesk was received February 6 2026, confirming the exclusion of listed species based on habitat constraints.

3.2.2. Community consultation

Pre-EIS exhibition

Prior to the EIS being published on the Major Projects Portal, the Applicant posted a letter to all residences within 2km of the Project and stakeholders who registered their interest with the Project. The letter notified all residences and registered stakeholders that the EIS would soon be published on the Portal, with a link and instructions on how to view and make a submission.

One neighbour responded to the Applicant via email, seeking further clarification on assessment. The Applicant responded personally to the neighbour. No further correspondence was received.

No local objections were received in the submission period, as such further consultation with the community was not necessary.

Post-EIS exhibition

The Registered Aboriginal Parties (RAPs) who registered their interest with the Project were invited to comment on the Addendum Aboriginal Cultural Heritage Assessment Report (ACHA), that was required to support the amendments to the Project.

A copy of the draft addendum ACHA report was provided to all the RAPs for comment on 27 February 2026, with a minimum 28-day review period.

The Registered Aboriginal Parties (RAPs) who registered their interest with the Project were invited to comment on the Addendum Aboriginal Cultural Heritage Assessment Report (ACHA), that was required to support the amendments to the Project (Appendix D.1 of the Amendment Report).

A copy of the draft addendum ACHA report was provided to all the RAPs for comment on 27th February 2026 with comments requested by close of business on 27th March 2026. A reminder email was sent a week prior to the end of the comment period. One response was received thanking NGH for providing the draft addendum for review but no comments were received on the draft addendum ACHA.

3.3. Further assessment

To support the amendments and respond to agency submissions, further assessment and updates were made to the following specialist studies:

- Accommodation inventory (Appendix D.1)
- Preliminary Hazards Assessment (Appendix D.2)
- Biodiversity Development Assessment Report (Appendix D.3)
- Flood Impact Assessment (Appendix D.4)
- Traffic Impact Assessment (Appendix D.5)
- Addendum Aboriginal Cultural Heritage Assessment (Appendix D.1 of the Amendment Report)
- Noise Memo (Appendix D.2 of the Amendment Report).

4. Public and SIG submissions

The issues raised in the public and SIG submissions have been grouped as set out in Table 2-5 above, to allow more specific responses to be provided. Each *issue* raised in public submissions is addressed in this report, not each submission individually. A cross-referenced table is provided in Appendix A so that the response to each individual submission can be tracked.

4.1. The Project itself

4.1.1. Location

Issue

Regarding the Project's location:

- Nine submissions raised concerns that it would be located near the Mulwala Canal, near to existing farmland.
- 16 submissions raised concerns that the Project would be located in the "Riverina Food Bowl"

Submission ID:

SE-101330496 SE-101339716 SE-101345707 SE-101349966 SE-101361459 SE-101362460
SE-101362462 SE-101358208 SE-100314233 SE-101119957 SE-101121710 SE-101129708
SE-101209207 SE-101243707 SE-101244229 SE-101249957 SE-101330496 SE-101339716
SE-101349966 SE-101360707 SE-101361459 SE-101362462 SE-101358208 SE-101244715

Project response

The location of the BESS has a strong justification, as detailed within the strategic context (Section 2) of the EIS. It is located within close proximity to the existing substation where it will contribute to the resilience of the energy network supplying this rural area. The BESS is located closely to existing electrical infrastructure (including the existing Finley Solar Farm) and generally minimised the impact of additional transmission by using existing road corridor. This minimises additional impacts and fragmentation of agricultural land.

The environmental assessment details the site selection justification. While it is located near the Mulwala Canal (approx. 570m), the Project is not intersecting the canal, nor will it negatively impact on the function of the canal. The proposed transmission line would also be built in accordance with Murray Irrigation guidelines.

The site itself is small and would not fragment agricultural land or impact significantly on local or regional agricultural production. In addition, the Project would not negatively impact the current associated receivers operations.

4.2. Procedural matters

4.2.1. Flora and fauna assessment

Issue

Regarding procedural matters:

- One submission raised issue with the lack of adequate survey for EPBC listed species, with none carried out for the Sloane's Froglet or fish

Submission ID:

SE-101349966

Project response:

The presence of one threatened fauna species under the *Biodiversity Conservation Act 2016* (BC Act) the Southern Myotis (*Myotis macropus*) has been detected on site associated with riparian corridors. Its presence has been appropriately mitigated and offset.

The timing and effort for the threatened flora and fauna species (including the Sloane's Froglet) were undertaken within the recommended survey period in accordance with Biodiversity Assessment Method (BAM), as detailed within Section 2 of the Biodiversity Development Assessment Report (BDAR) and Section 6.1.1 of the EIS. This has since been updated following advice from CPHR, to provide further detail.

No species listed under the *Environmental Protection Biodiversity Conservation Act* (EPBC Act) have been identified as having the potential to be significantly impacted by the development. The EPBC Act referral (EPBC 2025/10152) determined that the proposal is not a controlled action.

Fisheries NSW have not identified any key fish habitat near the site. As such, survey for fish were not required.

4.3. Environmental, social and economic impacts

To assist navigation, the submissions below are subcategorised by their general impact area:

- Hazards and risks
- Land, water and land use
- Socio economic
- Amenity
- Waste and decommissioning
- Biodiversity impacts
- Traffic

4.3.1. Hazards and Risk

Issue

46 submissions raised concerns regarding the potential for the BESS components to

- Explode like a bomb
- Create toxic fires
- Undergo Thermal runaway
- Leak toxic substances that will contaminate the soil, surface water and ground water
- Be abandoned as toxic waste
- Training and standards for first responders if the BESS ignites as it is:
 - Difficult to extinguish
 - Created toxic emissions

NB: Some submissions had concerns across multiple areas.

Submissions Report

South Coree Battery Energy Storage System

Submission Id:

SE-100314233 SE-100598459 SE-101119957 SE-101121710 SE-101129708 SE-101143459
SE-101149223 SE-101191964 SE-101197980 SE-101198216 SE-101209207 SE-101210210
SE-101216207 SE-101249957 SE-101330496 SE-101339716 SE-101340488 SE-101345707
SE-101349966 SE-101357708 SE-101357710 SE-101359211 SE-101359212 SE-101360221
SE-101360224 SE-101360232 SE-101361457 SE-101361462 SE-101362207 SE-101362211
SE-101362460 SE-101362462 SE-101132220 SE-101191958 SE-101205214 SE-101233749
SE-101244715 SE-101358208 SE-101360457 SE-101362457.

Project response:

The issue of fire and contamination is understandably a key concern to the wider community, who have concern for local members of the Rural Fire Brigade who may be called to attend local fires, whether they start on a BESS site or in the surrounding farmland.

The key to fire management is incident prevention. BESS's are designed, operated and constructed to prevent fires and leaks:

- The chosen BESS technology for the South Coree is Tesla Megapack – lithium-iron phosphate (LFP). LFP batteries are more stable and far less toxic when compared to traditional lithium-ion Batteries (LiB) This composition is less prone to thermal runaway.
- Tesla Megapacks **do not** contain heavy metal combinations such as nickel manganese cobalt (NMC), nickel cobalt aluminium (NCA), or lithium cobalt oxide (LCO).
- The design of the BESS units and their separation distances are prescribed to control thermal runaway, should one of the units malfunction. The batteries would be installed in accordance with the updated Preliminary Hazards Assessment (PHA) which exceeds the manufacturers recommendations (Appendix D.2).
- Risks of battery fires are addressed through built in prevention mechanisms and real-time safety monitoring.
- Trained service teams are on call 24/7 to respond to issues before they can escalate.

The PHA submitted as part of the EIS evaluated the risk of these events and prescribed standards and mitigation measures to address them such that the risk is now considered acceptable.

The Project acknowledges that BESS fires may be difficult to extinguish, however, appropriate education and training would inform local fire authorities in managing heat load, potential fire propagation and smoke emissions.

Fire and emergency response procedures must be agreed in consultation with the Rural Fire Service, Fire Rescue NSW, Berrigan Shire Council and other relevant emergency Services. This commitment was stipulated in Mitigation Measure **H01**, however has been updated for clarity in Section 6 of this report. Collaboration with the local emergency services will ensure that they are familiar with the BESS layout and safety protocols. This collaboration enhances effectiveness of emergency response in the unlikely event of an incident.

The PHA and Section 6.4.5 of the EIS considered the access requirements in line with the NSW RFS Planning for Bushfire Protection (PBP) 2019 to ensure safe egress from the site and that defensible spaces are provided around the facility. Specifically, the following design considerations will be met to ensure that the Project is accessible and trafficable:

- Minimum 11m asset protection zone (APZ)
- Management of APZ maintained to the standard of an inner protection area
- Preparation of a Bush Fire Emergency Management and Operations Plan
- Inclusion of 2 x 50,000 L static water supply.

Submissions Report

South Coree Battery Energy Storage System

As for fire explosion risk is generally considered to be low when managed appropriately. Tesla Megapacks are designed to incorporate gas detection, ventilation, pressure release and fire detection systems to mitigate flammable gas build up. Compliance with Australian standards and fire safety strategies are an explicit requirement for grid connected BESS sites, including for fire prevention and emergency response planning.

The Project would be decommissioned in accordance with the conditions of consent. Decommissioning is addressed further in Section 4.3.5.

4.3.2. Land, water and land use

Issue

- 32 unique submissions raised concerns that the batteries would during construction, operation and decommissioning, release heavy metals and toxins into the soil and water.
- 11 submissions specifically noted PFAS and BIFAS's potential to contaminate soil and water resources and have a negative impact on human health.
- 21 submissions raised concerns that the Project would impact on agricultural land with one specifically noting that the Project would "sterilise" the land for agricultural use.
- Several submissions were concerned that there is no clear plan for future removal and land restoration

Submission ID:

SE-101121710 SE-101126457 SE-101129708 SE-101191964 SE-101197980 SE-101198216
SE-101209207 SE-101216207 SE-101216213 SE-101241458 SE-101359212 SE-101359217
SE-101360216 SE-101360218 SE-101360221 SE-101360224 SE-101360226 SE-101360229
SE-101360232 SE-101360234 SE-101361459 SE-101362460 SE-101132220 SE-101209975
SE-101358208 SE-101360208 SE-101362457 SE-101244211.

Project response:

Toxins

The PHA assessed the Project's battery risks including potential for chemical leaks from the BESS. This included potential to release electrolytes (liquid/vented gas) from the battery cell coolant leak, refrigerant leaks and exposure to hazardous materials. The likelihood rating for these events resulting in consequences with controls in place was concluded as very unlikely.

As described in the PHA, the controls that would be in place include adopting all recommendations provided by the *Victorian Big Battery Fire Statement of Technical findings* – Victorian Government 2021 and relevant standards.

The separation distances between modules proposed by the Project meets minimum separation requirements, based on the latest PHA requirements.

PFAS components are limited to the internal electrodes and binder, electrolyte and separator of the battery. The battery would be fully encased and would unlikely pose a threat to soil and water resources or employees on the site. Batteries would be housed in self-bunded containers and if in the unlikely event of a rupture to a battery, would be captured removed and treated. Personnel handling the batteries would use appropriate personal protective equipment.

Binders (within the battery cell) are usually comprised of polyvinylidene fluoride (PVDF) which are technically classified as PFAS, however, when compared to PFAS the chemical structure differs (Henry, et al., 2018) PFAS are considered a molecule (short in structure and light weight) and PVDF are considered polymers (long chain and heavy weight) and as such, unlike PFAS molecules, PVDF polymers;

Submissions Report

South Coree Battery Energy Storage System

- Has a high molecular weight
- Are not bioavailable
- Do not migrate or leach easily.

Functionally, PVDF behaves very differently from PFAS, PFOA or PFOS.

BIFAS contamination refers to the presence of PFAS chemicals in biosolids, compost, and related environmental materials, and occurs when recycled organic material contain PFAS. The Project does not produce biosolids, compost of organic material. As detailed above, the risk of PFAS or PVDF contaminating soils for future use is also low. In addition, battery components will be recycled at appropriately licensed facilities.

Agriculture and toxins

For the purposes of the Project the word “sterilise” is not in reference to sterilising soil chemically. It means to remove the land from the current land use of Agricultural production. It is a term which references the limiting impact the Project would have for mining resources activities or any alternative land use for the life of the Project. The Project Site would be rehabilitated to a safe, non-polluting state suitable for Agricultural enterprises in line with current irrigation activities in the local region.

Decommissioning and rehabilitation

Decommissioning and rehabilitation including land restoration would be undertaken by the owners of the Project at the time of decommissioning. This is a commitment in the Project and is captured in the Decommissioning plan.

4.3.3. Socio economic

Issue

29 unique submissions raised concerns around the Project’s impact on:

- Food security
- Use of public funds to build or decommission the project
- Cost of electricity
- Modern day slavery
- Impact on human health from contamination and pollution of agricultural lands.

Submission ID:

SE-100314233 SE-100598459 SE-101119957 SE-101121710 SE-101126457 SE-101129708
SE-101143459 SE-101149223 SE-101209207 SE-101216207 SE-101216213 SE-101239467
SE-101241458 SE-101243707 SE-101244229 SE-101249957 SE-101330496 SE-101339716
SE-101340488 SE-101349966 SE-101357708 SE-101357710 SE-101360707 SE-101361459
SE-101362462 SE-101209975 SE-101233749 SE-101244715 SE-101358208.

Project Response:

Food security

As described throughout the EIS, the Project Site is quite small and will not impact on nor fragment on Agricultural production in this area. Contamination concerns are addressed in Section 4.3.1, however, it is very unlikely that there will be contamination of soil or water in particular that used for current or future agricultural enterprises destined for human consumption.

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South Coree Battery Energy Storage System

As stated in Section 6.9 of the EIS, the Project Site (where the BESS infrastructure would be located) constitutes 4.97 hectares of the 367524.84ha (0.00135%) of Class 3 land in the region.

Funding

The Project is fully funded by private company. It is not supported by any government subsidies, or the tax payer.

Cost of electricity

The NSW Government (NSW Climate and Energy Action) indicate that the benefits of distribution connected batteries when installed at or near substations, they can:

- Support the secure integration of more renewables into the grid, such as wind and solar.
- Improve the efficiency and competitiveness of the NSW electricity market, driving down generation cost.
- Store energy during low-demand periods and release it during times of peak demand, deferring the need for costly network upgrades.

Ethical considerations

It is acknowledged that the BESS industry faces challenges in environmental, social and governance performance due to a heavy reliance on component manufacturing limited to particular geographic regions. Lithium and cobalt are both critical battery components, but their mining and processing often involves labour abuses and ethical malpractices.

As part of the Applicant's due diligence during the tendering process, they will review the original equipment manufacturer (OEM) modern slavery approach. The preferred OEM at this stage is Tesla. Tesla has a stringent procurement auditing process. Its Responsible Sourcing Policies outline a robust approach to forced labour, modern slavery, child labour and human trafficking. It has published a Modern Slavery Transparency Statement which sets out mitigating steps it has taken around its sourcing of raw materials for batteries.

It also meets the Applicant's Management of Partners expectations and is taking a range of actions to address modern slavery in its supply chain. Tesla acknowledges that there are modern slavery risks in the global battery supply chain and is transparent about the challenges and the mitigations it applies. The Applicant will continue to work closely with the supplier to identify and address any modern slavery risks.

Human health

Contamination of agricultural land including soils and water (both surface and groundwater) is covered in Section 4.3.1. Through the implementation of appropriate safeguards and mitigation measures, it is unlikely that the Project would adversely affect the soils and water quality. As such it is unlikely that the Project would negatively impact on human health through the soil-water-food pathway.

4.3.4. Amenity (air quality and noise)

Issue

16 submissions raised concerns regarding air quality in the event of a fire and noise emissions from the Project.

- Toxic smoke events
- Unmitigable hazardous smoke
- Continuous noise impacting nearby residents and daily life

Submission ID:

SE-101119957 SE-101143459 SE-101149223 SE-101216213 SE-101330496 SE-101340488
SE-101359208 SE-101359211 SE-101359217 SE-101360216 SE-101360234 SE-101191958
SE-101205214 SE-101209975 SE-101233749 SE-101244211

Project response:*Smoke*

In recent years, concern has been growing within communities in proximity to BESS developments, as well as wider NSW. In regard to air quality, concern has been raised to the potential release of toxic pollutants from battery containers in the event of a battery fire, and the potential impacts on human health and safety of the nearby community and first responders.

There have been up to 88 recorded incidents of BESS failures worldwide since 2011 (EPRI, 2024). Industry efforts to improve BESS safety have rapidly developed over recent years with a sharp decrease in failure rate.

Below provides a review of available literature from recent notable events, both in Australia and overseas, and discuss the implications in the event of a battery fire on ambient air quality.

The Victorian Big Battery Fire**Background**

The Victorian Government issued the *Victorian Big Battery Fire Report of Technical Findings* (Fisher Engineering, 2022) following the events at the Victorian Big Battery (VBB) on 30 July 2021.

The VBB experienced a fire that started in one Tesla Megapack (MP1), comprised of lithium-ion battery cells, which spread to a neighbouring Megapack (MP2) during the installation and commissioning phase. MP1 was manually shut down at 7:20am without any abnormal conditions.

Smoke was then observed from MP1 at 10:00am, leading to the isolation of all Megapacks and a call to emergency services. The Country Fire Authority (CFA) set up a 25m perimeter and applied cooling water to nearby battery containers to limit exposures. The fire spread to MP2 around noon due to strong winds pushing flames from MP1. The CFA allowed MP1 and MP2 to burn out as per Tesla's guidelines, without direct water application. The fire was contained to MP1 and MP2, burning out over six hours with no injuries or explosions. Visible fire subdued by 4:00pm, with a fire watch and site monitoring for three days before the formal investigation began on August 2, 2021.

Post event monitoring

The Environmental Protection Authority (EPA) Victoria deployed two mobile air quality monitors within 2km of the VBB site. Locations were chosen where there was potential to impact the local community. The key pollutants measured included:

- Hydrogen Fluoride (HF): A toxic gas that can be released during the combustion of certain materials, including lithium-ion batteries
- Carbon Monoxide (CO): A colourless, odorless gas that can be harmful when inhaled in large amounts.
- Particulate Matter: These are tiny particles that can penetrate deep into the lungs and even enter the bloodstream, posing significant health risks.
- Volatile Organic Compounds (VOCs): These are organic chemicals that can easily become vapours or gases, contributing to air pollution and potential health hazards.

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Following the incident, the EPA monitors confirmed “good air quality in the local community”. It should be noted that measurements were not taken during the peak of the fire event, and were taken approximately two hours after the fire was extinguished. As such, the data could not be used to understand airborne pollutants during the event. The data did demonstrate that the air quality in the surrounding area was “good” and no long-lasting air quality concerns arose from the event.

During the fire event, the CFA worked with site personnel to manage water run-off into a catchment area. Water samples were collected and tested for potential contamination, with results showing minimal impact from the fire. As a precaution, the water was later removed and taken to a licensed waste facility for treatment and disposal.

Conclusion

The findings of the *Victorian Big Battery Fire Report of Technical Findings* (Fisher Engineering, 2022) highlights that the fire was effectively contained and managed without causing significant harm to the environment or public health. Despite the fire spreading between two Megapacks, the coordinated response by the CFA and site personnel, along with post-event monitoring by the EPA, ensured that the impacts to air and water quality remained within safe levels. The incident did not result in long-lasting environmental impacts or injuries.

Moss Landing Vistra Battery Fire, California

Background

The United States Environmental Protection Agency (US EPA) completed an air monitoring assessment following the Moss Landing Vistra Battery Fire (U.S. EPA, 2025). The Moss Landing Vistra battery fire occurred on January 16, 2025, at the 300MW battery energy storage facility in Monterey County, California. The BESS Facility relied on nickel-manganese-cobalt (NMC) lithium-ion cells, a high-energy-density chemistry known for its susceptibility to thermal runaway. The fire broke out during routine operations. The fire burned for approximately two days, and was contained to the Moss 300 building, preventing it from spreading to other energy storage facilities or the nearby natural gas plant. The nearest residents to the fire were location approximately 1.5km from the facility, and as a precaution, approximately 1,200 nearby residents were evacuated for 24 hours.

Monitoring during and post event

Similarly to the VBB, the US EPA monitored for hydrogen fluoride, along with other particulate matter. A total of nine monitoring stations were installed shortly after the fire started, with two at the BESS facility, and the other seven located in communities surrounding the facility. Monitoring stations were sited to account for changes in wind direction and potential drift to nearby communities. The EPA recorded that:

- EPA’s monitoring showed concentrations of particulate matter to be consistent with the air quality index throughout the Monterey Bay and San Francisco Bay regions, with no measurements exceeding the moderate air quality level.
- Hydrogen fluoride gas was measured at one second intervals and there were no exceedances of California’s human health standards.

The California Department of Toxic Substances Control (DTSC) conducted preliminary soil screening on January 24, 2025. (County of Monterey, 2025). They focused on areas most likely to be impacted by the fire, such as pathways and locations frequented by the public. The soil was tested for heavy metals like cobalt, manganese, nickel, and copper. Water sampling was also undertaken with samples collected from five small water systems near the Moss Landing power plant. These samples were tested for metals including lithium, cobalt, nickel, aluminium, and copper.

Submissions Report

South Coree Battery Energy Storage System

Initial results showed that the levels of these metals did not exceed drinking water standards. At this stage, the County of Monterey Health Department continues to monitor soil and water quality, with plans for further testing based on the results of the initial screenings.

Conclusion

These results confirmed that the fire did not pose a significant threat to air quality or public health in the surrounding areas, with preliminary screening on water and soil detailing that pollutants and potential contaminants were within acceptable levels. While the evacuation order was undertaken as a precaution due to the nature of the event with new and unknown factors at the time, the findings show that the order was not necessary.

Air Quality, Dispersion Modelling and Risk Assessment Review

Background

An Air Quality, Dispersion Modelling and Risk Assessment, incorporating a literature review, was undertaken by Calvin Consulting (Calvin Consulting, 2022). The assessment provided a detailed analysis of potential emissions from BESS's. The assessment focused on a proposed BESS located 15km west-northwest of Cochrane, Alberta, with the proposed battery chemistry being LFP (the same chemistry as the South Coree BESS). Source and emission data were derived based on the literature review, including reported laboratory test data. Air quality dispersion modelling was performed taking into account local wind data, groundcover, terrain influences, on-site building influences and the location of the closest residences.

Assessment results

The assessment concluded that:

- In the event of a BESS fire, maximum concentrations for Hydrogen Fluoride and Carbon Monoxide are predicted to exceed ambient air quality levels in close proximity to the BESS site, as would be expected during a fire.
- All concentrations are predicted to comply with their applicable ambient air quality levels beyond the BESS facility perimeter.
- From a health or safety perspective, all maximum 10-minute average concentrations beyond the BESS perimeter line are predicted to be well within applicable Immediately Dangerous to Life of Health (IDLH) limits
 - The assessment did not predict any significant off-site health or safety impact associated with BESS emissions in the event of a fire
- Given the safety features of the BESS systems being considered and the low probability of a BESS fire from LFP batteries, coupled with the acceptable off-site maximum predicted air quality and IDLH concentrations, the risk to the public and nearby receivers in association with this project was deemed to be low.

Based on the events and findings from both the Victorian Big Battery fire and the Moss Landing Vistra battery fire, and incorporating the Air Quality, Dispersion Modelling and Risk Assessment findings from Calvin Consulting, it can be concluded that impacts to air quality from a BESS fire are unlikely to significantly affect the health and safety of the nearby community and first responders.

In the unlikely event of a fire event, water may be used for smoke, gas and vapour knockdown to prevent off-site impact, firewater would be managed with details provided in the Fire Water Management Procedure (mitigation measure **FH03**).

Noise

Submissions Report

South Coree Battery Energy Storage System

Specialist studies undertaken indicate that it is unlikely that there will be any exceedances during construction or operation for any non-associated receiver. There are no operational noise exceedances for non-associated receivers for the Project. The Project has committed to a noise wall to mitigate potential noise impacts to the associated receiver.

4.3.5. Waste and decommissioning

Issue

Nine submissions were concerned that

- The infrastructure including batteries would not be able to be recycled
- There is no clear plan for decommissioning
- The taxpayer would have to foot the bill
- No guarantee that the land would be restored

Submission ID:

SE-100314233 SE-101149223 SE-101357710 SE-101359217 SE-101360224 SE-101360234
SE-101132220 SE-101191958 SE-101209975 SE-101244715 SE-101358208 SE-101360208.

Project response:

Waste and Recycling

The EIS detailed the likely construction and operational waste streams associated with the Project and included their potential for reuse, recycling and disposal options. Recycling and reuse options were identified for ancillary buildings and structures. Recycling options were identified for LFP batteries and electrical cables.

It is noted that recycling of battery components in Australia is currently in its infancy. It is expected that the recycling of batteries will scale with demand. The CSIRO is confident that the LFP batteries are highly recyclable and would be used to make new batteries in the future as the demand. Currently, commercial businesses selling second life LFP batteries supporting water pumping and camping are emerging.

B-Cycle is a government backed scheme which is run by the Battery Stewardship Council and authorised by the Australian Competition and Consumer Commission (ACCC) to promote the safe use and disposal of batteries including LFP batteries. In 2024, there are 10 B-Cycle accredited, EPA - permitted and licensed recyclers of mixed batteries including LFP batteries in Australia that are collecting, sorting and processing batteries. There is one processor currently recycling commercial sized LFP batteries. The number of recycling plants with these accreditations is anticipated to grow with demand.

As identified in the EIS, there are a number of strong recycling commitments. The Project has committed to recycling all batteries at an accredited B-Cycles accredited, EPA permitted and licensed recycler of LFP batteries.

Decommissioning

The NSW government does not require decommissioning bonds for BESS facilities. The Project would be decommissioned in accordance with the associated landholder agreement, the decommissioning plan proposed within the EIS and would be subject to Conditions of Consent, and mitigation measures specifically covering decommissioning. This would ensure full and safe decommissioning and the return to the site to a stable productive agricultural site.

It is noted that pending project approval, the approval would not be time limited. If the site is not repowered at the end of its useful life, then it would be decommissioned at some future time. The decommissioning

phase would involve removal of all above ground infrastructure (including concrete slabs and footing) and below ground infrastructure where possible and return of the site to its existing land condition.

4.3.6. Biodiversity Impacts

Issue

13 Submissions raised concerns on the impacts on:

- Destructive to native flora and fauna
- Impacts to critically endangered fauna
- Cumulative environmental impacts
- Loss of vegetation
- Concern for endangered species
- Concerns for impacts to Mulwala canal and nearby wetlands

Submission ID:

SE-101198216 SE-101340488 SE-101359208 SE-101359212 SE-101359217 SE-101359222
SE-101360216 SE-101360218 SE-101360221 SE-101360224 SE-101360229 SE-101362462
SE-101205214

Project Response:

The Project has been developed to avoid impacts on native vegetation and habitat. The Project is located on cleared agricultural land. The land siting the Project, along with the transmission route and the receiving Transgrid lot has been surveyed and reported on in the Biodiversity Assessment Report (BDAR). This report identified any potential impacts to biodiversity values along with appropriate mitigation measures.

The BDAR indicates the following:

- The Project Site lies within a predominantly cleared and fragmented landscape used for agriculture, limiting habitat connectivity. This is consistent with the surrounding landscape.
- The Project includes clearing of 8.30 hectares of low-quality native grassland. The low quality indicates the grassland is predominately exotic and generates minimal offset requirements.
- The Project and roadside vegetation are cleared of native trees and shrubs. No trees or woodland zones will be cleared. No threatened fauna was detected.

Impacts to the Mulwala canal and nearby wetlands is not expected as Stormwater management and Fire water management are intended to manage water movement on site.

4.3.7. Traffic

Issue

6 submissions raised concerns regarding the impact of increase traffic created by the Project in regard to:

- Potential safety risks
- Damage to the road infrastructure.

Submission ID:

SE-101340488 SE-101191958 SE-101209975 SE-101244715 SE-101358208 SE-101360208

Project response:

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Safety

A Traffic Management Plan (mitigation measure **TA01**) will be developed to manage traffic movements to and from the site. This is a commitment in the EIS, and takes into account local traffic movements. All construction traffic movements in the early morning and afternoon peaks as well as all heavy vehicle movements will access the site from the Riverina Highway and Canalla Road.

The Project will also predominately be operated remotely. And as such, very little traffic is required during the operational period.

Road damage

The specialist Traffic Impact Assessment accompanying the EIS indicates that dilapidation surveys and necessary road maintenance of Canalla Road and Brockmans Road on the project access route, should road maintenance be required (mitigation measure **TA05**).

Along the broader road network, a schedule of road upgrades has been provided in the report which has identified minor road works comprising of temporary roadside hardstand are proposed to accommodate the largest vehicles combinations expected to deliver plant to site.

4.4. Justification

4.4.1. Grid stability

Issue

14 submissions raised concerns around the Projects capacity to firm energy supply;

Specifically concerns include

- Battery systems are intermittent and undermine base load Australian coal energy projects
- Weaken grid security

Submission ID:

SE-100314233 SE-101119957 SE-101129708 SE-101143459 SE-101209207 SE-101210210
SE-101216207 SE-101243707 SE-101249957 SE-101357708 SE-101357710 SE-101233749
SE-101244715 SE-101358208

Project response:

BESS role in the grid

Utility scale batteries increase NSW and the nation's energy security by providing dispatchable energy on demand during troughs in variable renewable energy outputs and are regulated by the NSW government. AEMO has determined that Battery Energy Storage Systems are an efficient way to store energy as part of an overall energy firming strategy for the grid which is increasingly important with sources such as wind and solar coming online. Considered with these renewable energy generation sources, the NSW Electricity Strategy notes that 'firmed' renewables are the cheapest energy option moving forward (NSW DPIE, 2019).

The South Coree BESS would have a capacity of up to approximately 80MW / 320MWh (4 hours). This storage duration is sufficient to rapidly respond to fluctuations in electricity supply and demand, helping to balance the grid and ensure the reliable power supply, by storing excess electricity during periods of low demand and releasing it during peak demand, batteries help smooth out the intermittent nature of renewable energy sources. It can also enhance grid resiliency by providing backup power during emergencies, network contingencies or power outages. They can quickly respond to disruptions, ensuring continuity of critical

services and reducing downtime. In areas prone to extreme weather events or where grid infrastructure is less reliable, batteries can play a crucial role in maintaining power supply and supporting essential operations.

Grid Forming connections

The Australian Energy Market Operator (AEMO) released a fact sheet in 2022 [Grid-forming BESS connection fact sheet](#) which indicates that to connect to the National Electricity Network NEM, the BESS needs to be operating in line with the National Energy Regulator (NER) rules, regulations and schedules. This enables the grid to maintain table operation when voltage disturbances are prevalent (AEMO, 2022).

4.5. Beyond the Scope of the Project

4.5.1. Foreign ownership

Issue

14 submissions raised concerns around foreign ownership,

Specifically, they are concerned that the Project:

- The grid could be controlled by foreign interests
- The grid would become unreliable as the foreign owner could “switch off electricity”
- Would impact on national security
- Cyber security implications from reliance on foreign made components.
- Electricity market would be played leaving consumers paying high costs for energy leading to energy poverty

Many submissions are concerned that the components of the Project are supplied from the Communist China Party and as such believe that this in itself creates national security issues.

Submission ID:

SE-101126457 SE-101129708 SE-101191964 SE-101197980 SE-101210210 SE-101239467
SE-101243707 SE-101249957 SE-101345707 SE-101357710 SE-101360461 SE-101233749
SE-101244715 SE-101358208

Project response:

Energy grid security and national security.

The Project is consistent with all Commonwealth, State, regional and local strategic plans and policies related to the delivery and storage of energy set out in the *NSW Electricity Infrastructure Investment Roadmap*.

In the instance where there is foreign ownership, the control of the asset would be subject to Foreign Investment Review Board conditions.

The control of the asset would be subject to the company that owns it. To access the NEM network, certain IT and security obligations must be met.

- IT and security provisions and obligations are required to comply with IT security imposed by Transgrid for connecting to the network.
- The inclusion of the asset does not impact the supply system; it is independent of the NEM and Transgrid system.
- There would not be any supply or stability issues or interruption in the unlikely event of the shutdown of this asset on the wider system stability.

Energy prices

The energy prices are governed by the National Electricity Rules [AEMO | Legislation and regulation](#). They determine how companies can operate and participate in the competitive generation and retail sectors, they also govern the economic regulation of electricity and distribution networks (AEMO, 2025). The National Electricity Rules provide the regulatory framework and processes for market operations, power system security, network connections and access, pricing for network services in the NEM and national transmission planning (AEMC, 2025).

4.5.2. Unrelated projects

Issue

10 submissions raised concerns around unrelated projects including:

- Wind projects
- Solar projects
- The desire for coal fire energy or nuclear energy

Submission ID:

SE-101119957 SE-101143459 SE-101191964 SE-101197980 SE-101330496 SE-101340488
SE-101359212 SE-101362460 SE-101244715 SE-101359215

Project response:

This Project is a stand-alone BESS located in close proximity to an existing substation near Finley NSW.

There will be no impact or interaction with wind and solar infrastructure beyond storing and firming the supply of energy.

Alternative energy considerations are likely to have their place but are not related to this project.

4.5.3. Government policy

Issue

Four submission raised concerns that the Project would not contribute to reaching Net Zero because

- Mining of rare earth associated with constructing the components of the electrical infrastructure is “refined and transported through fossil-intensive supply chains”.
- Suppliers of components do not adhere to comparable carbon or net-zero targets.

Submission ID

SE-101340488 SE-101357708 SE-101209975 SE-101362457

Project response:

The Project acknowledges that there are upstream emissions associated with the manufacture and supply of electrical infrastructure and components, and that supplier carbon reduction and net zero commitments vary internationally. These emissions arise from global supply chains and are outside the direct control of the Project. Accordingly, they are not considered further in the assessment beyond acknowledgement as embodied emissions associated with construction.

Notwithstanding these embodied emissions, the Project is consistent with the NSW Net Zero Plan Stage 1: 2020–2030 and the NSW Electricity Infrastructure Roadmap, which identify energy storage as essential

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enabling infrastructure for the transition to a low-emissions electricity system. The Project will provide firming capacity, energy shifting and essential system services, supporting increased renewable energy integration and reducing reliance on fossil-fuel-based generation. The system-wide operational emissions reductions enabled over the Project's operational life materially outweigh the one-off embodied emissions associated with construction.

4.5.4. Funding

Issue

Three submissions raised concerns that the Project would be subsidised by the government.

Submission ID:

SE-100598459 SE-101143459 SE-101149223

Project response:

The Project is wholly owned and funded by a private asset owner who is leasing the land from a private landholder through a lease agreement. No Government or public funding has been offered or accepted for the development of the Project at any stage.

It is noted at the development of the renewable energy industry in Australia (and grid firming related to it) has been very much on the back of foreign experience and capital. NSW has been fortunate to have attracted this capital and experience to commence the transitioning the National Energy Market to more sustainable footing, as coal plants are scheduled for retirement and the appetite to approve new coal generation facilities expires. For taxpayers and Australian businesses, there is a net benefit from the Project. Employment is generated at the planning, construction and operational stages.

5. Agency and organisation submissions

As detailed in Table 2-1, the following Agencies cited no further comment:

Crown Lands
DPI – Fisheries
DPI – NSW Resources
Heritage NSW – Aboriginal Cultural Heritage
Heritage NSW – Historic Heritage
Murray–Darling Basin Authority

As such, no further commentary has been provided, and these agencies have been excluded from the following section. Below are the responses to Agencies requesting further information.

5.1. Agency submissions

5.1.1. Department of Planning, Housing and Infrastructure

Submission	Response	Reference location
The Department requires an accommodation inventory to be submitted as part of the Response to Submissions in consultation with relevant councils to demonstrate sufficient accommodation is available	An Accommodation inventory has been complete, which concludes that Finley and surrounding towns possess adequate short-term accommodation capacity to meet the Project's peak workforce needs, provided that proactive coordination occurs with local operators. Overall, the Project's scale, duration, and construction scheduling have been designed to minimise cumulative and community impacts. While the broader housing market remains tight, the temporary nature of the Project workforce and its alignment with	Appendix D.1

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Submission	Response	Reference location
	off-peak tourism months significantly reduce the risk of community pressure.	
Noise wall – please confirm whether this will be included in the project and that its impacts are adequately assessed and mitigated.	The noise wall has been wholly assessed as part of the Project and agreed with the associated landowner. As such, its inclusion is requested as part of this DA for approval.	N/A
As part of the statutory compliance table in the RTS / Amendment Report, we require further information on how the relevant LEP / SEPP provisions have been addressed for the project.	Updated and detailed within Section 4 of the Amendment Report.	Section 4 of the Amendment Report
Access to Finley Substation – the TIA notes that access to the Finley Substation would be required for the project; however, it does not provide any detail on the vehicles expected to use this access, the anticipated number of movements, or an assessment of the safety of these movements on the surrounding road network. Please provide further detail within the TIA, including: - The types of vehicles accessing the substation (including maximum vehicle lengths); - The number and frequency of vehicle movements; and - An assessment of the safety and operational impacts of these movements on the road network. The Project description in the Amendment report will also need to be updated to reflect the use of this access during construction.	Access to the Finley substation would be required to enable construction of the 132kV cable connection and potential bench extension. The following clarifications have been made: - Section 4.3: The proposed traffic volumes are inclusive of the traffic anticipated to be generated by the connection works at the Finley Substation. - Section 8.2: In order to confirm suitable access for the connection works at the substation, a swept path assessment has been undertaken of a 26m B-Double at the existing access. This assumes absolute worse-case vehicle type accessing the substation. The swept path assessment provided in Appendix D of the updated TIA confirms that the existing access and road can suitably accommodate the largest project vehicles to and from the substation. - Figure 11: The map for the proposed project access route has been updated to include the existing Finley substation.	Appendix D.5

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Submission	Response	Reference location
	4. The safety and operational impacts of these movements are assessed within the construction traffic assessment. The TIA identifies that the local road network and associated intersections on the proposed access route are suitable to accommodate the traffic generated by the proposal without significant adverse safety or operational impacts.	
Hourly vehicle numbers – The TIA indicates that heavy vehicle trips in the peak hour are predicted at 4 trips (i.e. 2 movements under the definition applied in the conditions) per hour. However, the total daily trips are predicted to be 64 trips (32 movements). If distributed evenly across construction hours, this would result in a higher number of movements per hour than those identified for the peak hour. As the proposed conditions seek to impose both daily and hourly limits on heavy vehicle movements, it is necessary to clearly understand the maximum number of heavy vehicle movements that may occur in any given hour (not limited to the nominated peak hour) and to demonstrate that the road network has sufficient capacity to accommodate these movements. Please confirm within the TIA: - The maximum number of heavy vehicle movements expected per hour; and - That the surrounding road network can accommodate these movements.	Further clarity has been provided in Section 4.3 of the updated TIA around traffic numbers: - The peak hour assessed in Table 7 of the TIA applies for when the site will generate the most traffic in an hour – generally in the morning and afternoon when staff come and go. The level of heavy vehicles in that peak hour does not represent the highest levels in an hour for heavy vehicles, as that would occur over the course of day outside road network peak periods. - It is anticipated that up to 20 heavy vehicle trips (10 trucks arriving and departing) would occur in an hour outside the construction and road network peak hours. This represents approximately one heavy vehicle entering or departing every 3 minutes. This level of traffic can be readily accommodated by the surrounding road network without adverse impacts. It is also noted that the peak of 20 heavy vehicle trips per hour would not occur consistently throughout the day and reflects a worse case in a given hour. An example of this is one-off construction activities such as a concrete pour.	Appendix D.5

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Submission	Response	Reference location
	Recommended conditions are as follows: <i>The Applicant must ensure that the:</i> (a) <i>development does not generate more than:</i> (i) <i>32 heavy vehicle (including up to 4 heavy vehicle requiring escort) movements a day during construction, upgrading or decommissioning;</i> (ii) <i>2 heavy vehicle (including up to 1 heavy vehicle requiring escort) movements per hour during construction and network peak hours; and 10 per hour outside the construction and network peak hours in construction, upgrading or decommissioning;</i> The TIA notes that cumulative impact scenario would continue to be reviewed post approval. As per Section 9.2 of the TIA; it is noted that if the cumulative assessment indicates that traffic volumes are less than that assumed in the conservative assessment presented in Section 7 (e.g. if Finley BESS is not constructed concurrently with the project) it may be appropriate to generate higher levels of traffic, subject to the consideration and approval of the relevant road authorities.	
Please confirm whether the shuttle bus meets the definition of a 'light vehicle' or whether it is a 'heavy vehicle' and should be included in the heavy vehicle numbers for the project.	The updated TIA has defined shuttle buses in Table 6 to be light vehicles, as they do not meet this definition of heavy vehicles: <i>As defined by the Heavy Vehicle National Law (NSW), but excluding light and medium rigid trucks and buses no more than 8 tonnes and with no more than 2 axles</i>	Appendix D.5
Subdivision: the current reports imply that subdivision may be sought	Transgrid have not confirmed if the Project substation requires to	Section 4 and

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Submission	Response	Reference location
for the project; however, no supporting detail or subdivision plan has been provided: • If subdivision is not proposed as part of the current application, please clearly state this in the report (i.e. confirm that subdivision does not form part of the project). • If subdivision is proposed, please provide a subdivision plan and any other relevant supporting information.	be subdivided or not. The need for subdivision will be confirmed in ongoing consultation with Transgrid and confirmed in detailed design. However, for the purpose of flexibility, Development Consent for subdivision is being sought. A subdivision plan is provided below in Figure 5-1, and the Statutory context for the Project around subdivision under the minimum lot size has been detailed within Section 4 and Appendix A of the Amendment Report.	Appendix A of the Amendment Report Figure 5-1 below

Ref: 240316 South Coree BESS Planning_RTS_20217\Figure 5-1 Subdivision Plan Author: Sarah Hillis Date created: 29.05.2026 © NGH 2026



Datum: GDA2020 / MGA Zone 55



South Coree BESS
Figure 5-1 Proposed subdivision

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5.1.2. Department of Planning, Housing and Infrastructure - Hazards

Submission	Response	Reference location
What would be the maximum Effective Energy Storage Capacity at the beginning of service life, as defined in Figure 1 of IEC 62933-1 Ed. 2.0 b:2024, Electrical Energy Storage (EES) Systems—Part 1 for the BESS?	The rated output active power is around 86 MW. The effective energy storage capacity at the beginning of service life is around 345 MWh.	N/A
Please provide justification for the proposed separation of the batteries by 2.44 metres, including the following: a) Additional detail on the key equations and assumptions used in the fire modelling, including but not limited to: i. A list of the key equations applied in the modelling; ii. Assumed parameters such as flame height, emissivity, and atmospheric transmissivity; iii. Material properties used in modelling, including thermal conductivity, density, and specific heat capacity; iv. Any assumptions regarding surface insulation, protective coatings, or internal thermal barriers, details of any software or modelling tools used to develop and analyse the fire scenarios. b) Provide justification for why a direct flame impingement model was not used in the modelling, given the assumption of a 45-degree flame angle; c) Provide justification for why the cell venting temperature was not considered a critical parameter in the modelling	The Applicant has revised the BESS layout in response to this feedback, to increase the separation distances between BESS units (to 3.05m) such that the arrangement is consistent with the applicable requirements of NFPA 855. The PHA has been updated on the basis of the revised compliant layout.	Appendix D.2

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Submission	Response	Reference location
Re-examine the area allocated for the batteries and demonstrate that the layout allows for adequate spacing to minimise the risk of fire propagation, incorporating the findings of RFI 2 (if necessary).	The updated layout and Development Footprint assessed as part of the EIS allows for adequate spacing to minimise the risk of fire propagation.	Appendix C Appendix D.2

5.1.3. Conservation Programs, Heritage and Regulation Group

Submission	Response	Reference location
Flooding		
The FIA hydraulic model should be updated with the detailed design to accurately investigate flood behaviour. Incorporate the detailed design of the Project into the hydraulic model to accurately investigate the impact of flooding on the proposed development.	The intention of early modelling and studies is to be conservative in the planning assessment stage. The Project will update the hydraulic model during detail design. A new mitigation measure (F11) has been included, to commit to the updated hydraulic model and Flood Impact Assessment (FIA).	Section 5.2 and Appendix B
Finalise flood risk mitigation measures with a sufficient level of detail and justification for implementation. The proponent should define and justify the “adequate” freeboard, and subsequently, the finished level for the infrastructure. Given the nature of the proposed development, RD recommends that critical infrastructure is elevated at or above the probable maximum flood level where practicable.	Section 4.2.3– Design Considerations and Recommendations of the updated FIA (Appendix D.4) has been updated to include the adopted finished floor level (FFL) of the 1% Annual Exceedance Probability (AEP) plus 500mm freeboard. This is justified via the NSW Flood Risk Management Manual (NSW Government 2023). The adopted FFL not only provides substantial freeboard above the 1% AEP event but, also results in critical infrastructure being elevated approximately 200 mm above the modelled Probable Maximum Flood (PMF) level.	Appendix D.4 Section 5.2 and Appendix B

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Submission	Response	Reference location
	Mitigation measure FH01 has been updated to state BESS infrastructure will be constructed above the 1% AEP and PMF.	
Finalise the FIA, and future Flood Emergency Response Plan, in accordance with the recommendations provided by the NSW SES.	Section 4.3.1 and Table 4-1 – NSW SES Recommendations and Response of the updated FIA (Appendix D.4) demonstrates how the recommendations provided by the NSW SES have been addressed. This includes: • Duration of inundation to isolation • PMF consideration • Access/egress road resilience • Cumulative impacts • DCCEEW consultation • Infrastructure flood resilience.	Appendix D.4
Biodiversity		
The following ecosystem credit species have been excluded in the BDAR: • Brown Treecreeper • Grey-crowned Babbler • South-eastern Hooded Robin • Swift Parrot. The justification provided for the exclusion of these species relates to habitat degradation, which does not comply with Section 5.2.2(2) of the BAM. Ecosystem credit species can only be excluded based on	NGH reached out to CPHR and the BOS Helpdesk to confirm habitat suitability and species excluded from the BAM-C. Consultation undertaken with BOS help desk on 14th May 2025 confirmed appropriate to exclude ecosystem species lacking habitat. Consultation included in Section 5.1.1 and Appendix F.1	Appendix D.3 (BDAR Section 5 and Table 5-1)

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Submission	Response	Reference location
listed geographic limitations, habitat constraints or vagrancy. We note that this is a minor issue and is unlikely to impact the credit obligation, however the BDAR should be amended to ensure consistency with the BAM. Revise all predicted credit species removed from further assessment in accordance with Section 5.2.2(2) of the BAM. Update relevant sections of the BDAR, including Table 10, and BAM-C to include any species identified as requiring assessment.		
Biodiversity offsets need to be removed from Table 8.5, as they are not a mitigation measure and replaced where relevant with appropriate actions to ensure best practice mitigation measures are implemented for the project. Mitigation measures should follow SMART principles (specific, measurable, achievable, relevant, and time-bound). Measures need to be given unique identifiers for auditing purposes and to ensure each measure is tracked through the consent and post-approval processes. This also applies to measures in the EIS.	Mitigation measure B04 has been removed. Mitigation measures updated in Table 8-5 of the updated BDAR. SMART principles and unique identifiers have been applied to each mitigation measures. Recommended mitigation measures from CPHR have been incorporated. All mitigation measures in the EIS have unique Identifiers to allow for post approval auditing and processes.	
Provide additional evidence to demonstrate how the presence of Sloane's Froglet was excluded.	Additional detail on habitat for the Sloane's Froglet and survey effort have been detailed within Section 5.3.2 and Appendix D.3 of the updated BDAR. A small refinement has been made to mitigation measure B01, to ensure fencing and pre-clearance surveys for Sloanes' Froglet are considered in the Biodiversity Management Plan.	Appendix D.3 (BDAR Section 5.3.2 and Appendix D.3) Appendix B

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Submission	Response	Reference location
Revise the mitigation measures outlined in Table 8.5 of the BDAR and in the BMP.	Mitigation measures updated in Table 8-5 of the BDAR	Appendix D.3 BDAR Table 8-5
Section 1.1.3 of the BDAR states that the proposal will connect to the Finley substation southwest of the site, via an underground or overhead 132 kV transmission line. However, potential impacts from the transmission line are not mentioned in the BDAR. If the transmission line is to be overhead, the BDAR must assess the impact of transmission strike on threatened entities and their habitat, taking into account flight paths for resident, nomadic and migratory species likely to fly over the proposed development site. Impacts should be based on published literature and other reliable sources. If the transmission line is to be underground, impacts to water bodies or any hydrological processes that sustain threatened entities which occur on the subject land must be considered in accordance with Section 6.1.4 and 8.3.4 of the BAM. Relevant sections of the BDAR should be amended accordingly, including appropriate mitigation measures.	Assessment of impacts updated in Section 8.3 of the BDAR	Appendix D.3 BDAR Section 8.3

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5.1.4. Department of Primary Industries and Regional Development – Agriculture

Submission	Response	Reference location
Any rehabilitation and decommissioning strategy will include removal of all above and below ground infrastructure to allow greater opportunity for irrigated agricultural activities following decommissioning.	Section 6.9.3 – Decommissioning of the EIS states that all infrastructure both above ground and below ground would be removed during the decommissioning stage. Mitigation Measure LU02 commits to removal of all above and below ground cabling and infrastructure.	Appendix B
Preparation of the Pest and Weed Management Plan will specifically address biosecurity, weed and pest impacts relating to irrigated agriculture and the irrigation system in the vicinity of the proposal.	Mitigation measure SO6 commits to a Pest and Weed Management Plan to manage biosecurity, pest animals and weeds. Mitigation measure SO6 has been updated to specify the management plan should be tailored to irrigated agriculture and the irrigation system, as detail in Section 6.9.3 – Land Use Compatibility of the EIS.	Appendix B
Site rehabilitation upon decommissioning will include “Land forming to return the site to the pre-existing slope and flat features suitable for flood irrigation practices draining to the south (existing drainage)’ and will recognise historic irrigated land uses at the site and in the vicinity.	Mitigation Measure LU04 has been updated to include “and will recognise historic irrigated land uses at the site and in the vicinity”	Appendix B
If any subdivision is required by the utility provider thus resulting in lots that are smaller than the minimum lot size, no additional dwelling eligibilities are to be created.	It is not anticipated that subdivision will be required. However, if subdivision is required it would be solely for the siting of electrical infrastructure (i.e. the substation). No additional dwelling entitlements would be created. For the purpose of flexibility, Development Consent for subdivision	N/A

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Submission	Response	Reference location
	is being sought. A dwelling already exists on the balance of the land. As such, the current dwelling entitlement is exhausted.	

5.1.5. Fire and Rescue NSW

Submission	Response	Reference location
Prior to construction a Fire Safety Study (FSS) is developed in accordance with the requirements of the Hazardous Industry Planning Advisory Paper (HIPAP) No.2 and submitted to FRNSW for review. - The FSS is to be used to inform the design and as such it is FRNSW Position that the FSS be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ). - The FSS should be prepared consistent with the FRNSW Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations.	Mitigation measure H01 has been updated to specifically state the following are required to be developed in consultation with Council and relevant emergency services prior to construction and/or occupation: - Fire safety study - Emergency response plan - Bush Fire Emergency Management and Operations Plan - Emergency Services Information Package.	Section 5.2 and Appendix B
Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.15	As above	Section 5.2 and Appendix B

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Submission	Response	Reference location
Prior to occupation or commissioning an Emergency Services Information Package (ESIP) is developed for the site in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans	As above	Section 5.2 and Appendix B

5.1.6. Department of Climate Change, Energy, the Environment and Water – Water Group

Submission	Response	Reference location
Identify the potential locations of water supply works and complete an impact assessment of their construction and operation on the water source.	Consultation with Murray Irrigation during the EIS and RTS has noted the following: • All Temporary Water Access requests are subject to review and approval. • Temporary Water Access requests will only be considered closer to the supply date • The primary consideration is identification of a safe and suitable access point to the Murray Irrigation water source. • Murray Irrigation generally supplies water between mid-August and mid-May, subject to downstream demand. • Water availability is not guaranteed and may be impacted by MIL's operating mode. • If availability at the requested location is constrained, an alternative access point nearby via the Mulwala Canal may be considered. From a Works Policy perspective, any approved access would also need to comply with Murray Irrigation's Works Policy requirements,	N/A

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Submission	Response	Reference location
	including (but not limited to): • Formal approval prior to any works or installation of temporary infrastructure. • Access arrangements that do not impact channel integrity, operations, or third-party users. • Appropriate safety and access controls where access is via MIL tracks or public roads. • Reinstatement obligations, including maintaining MIL tracks in a condition similar to or better than pre-access condition. • Completion of any required site assessment and Maintenance/Works Supervisor approval prior to commencement. No works are to proceed until the application has been assessed and formal approval granted. As such, it is not appropriate at this time to identify the potential locations of water supply. Assessment of impact and mitigation controls are a part of the Temporary Water Access request, and will be discussed further with Murray Irrigation. However, construction access and water supply would comply with Murray Irrigation's Works Policy requirements. Mitigation Measure FH09 notes that prior to construction, an appropriate water access license will be obtained and temporary water allocations purchased from the water trade market. The Project will adhere to any licensing rules and regulations.	
Demonstrate sufficient entitlement can be obtained to account for water take from the relevant water sources.	Consultation with Murray Irrigation has confirmed water supply in principle. However, as note above Temporary Water Access Requests are subject to review and approval closer to the supply	N/A

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Submission	Response	Reference location
	date. BSC have also confirmed construction water supply, should access to the Mulwala Canal be unavailable.	

5.1.7. NSW State Emergency Services

Submission	Response	Reference location
Additional information regarding the duration to inundation and of isolation to be clearly outlined in the Flood Impact Assessment to inform the appropriate emergency management measures for the site.	Section 4.3.1 of the updated FIA (Appendix D.4) notes the following: <i>“The flat topography results in ponding and slow drainage, with the site potentially isolated for up to 13 hours during a 360-minute 1% AEP storm event and up to 22 hours during a 1440-minute 1% AEP storm event, while during a PMF event, the site would potentially be isolated up to 33 hours (1.4 days). Notably, peak inundation typically occurs 7.5 to 10 hours after rainfall commencement, providing sufficient lead time for implementation of flood emergency procedures including evacuation and pre-positioning of emergency supplies. This warning period allows occupants to safely relocate before access routes become impassable”</i>	Appendix D.4
Ensure the flood emergency response planning considers events up to and including the PMF event. The impact of flooding on the roadways should also go beyond immediately adjacent to the site to fully understand any evacuation constraints and ensure that any people that may be at the site during a flood event are able to evacuate to an	Section 4.3.1 of the updated FIA (Appendix D.4) notes the following: <i>“PMF modelling has been undertaken and demonstrates that critical infrastructure will be elevated to 108.24 m AHD, which is 200 mm above the modelled PMF level (108.04 m AHD). The FERP</i>	Appendix D.4

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Submission	Response	Reference location
area above the PMF before access routes getting cut. Evacuation must not require people to drive or walk through flood water.	<i>(to be developed as part of the detailed design stage of the project once the site layout has been finalised) will be triggered in advance of access road inundation, enabling evacuation before Broockmanns Road becomes impassable. During PMF events, the site will be evacuated prior to access being cut, with personnel evacuating to Finley (above PMF) via Broockmanns Road before H2-H3 hazard conditions develop. No evacuation will require driving or walking through floodwater.</i> <i>The hydraulic model extent will be extended further during the detailed design phase to inform the Flood Emergency Response Plan (FERP) on roads impacted outside of the catchment which the site is located within"</i>	
Request the consideration of flood resilience of the proposed access/egress roads, noting that access off Broockmanns Road "would require upgrading to enable safe entry and exit from the Project Site for all vehicles"5.	Section 4.3.1 of the updated FIA (Appendix D.4) notes the following: <i>"The main access via Broockmanns Road remains trafficable and maintains H1 hazard classification during the 1% AEP event. However, during extreme events (0.2% AEP and PMF), extensive inundation occurs across the broader Finley area due to the flat topography and network of raised irrigation channels.</i> <i>Upgrading Broockmanns Road to provide rising road access to the 0.2% AEP standard would require raising substantial sections of the road corridor beyond the immediate site frontage, which is beyond the scope of this project.</i> <i>The FERP will address this constraint through early warning triggers and pre-emptive evacuation procedures, ensuring site personnel evacuate via Broockmanns Road before it becomes impassable in</i>	Appendix D.4

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Submission	Response	Reference location
	<i>extreme events. Site access upgrades will incorporate localised drainage improvements to maintain safe vehicle access during frequent flood events”</i>	
Consider the cumulative impacts of the multiple proposed and existing developments on the flood behaviour in this area, particularly considering the increase in impervious surfaces (proposed hardstand areas, paved roads,6 noise wall,7 etc., that could impact on flood behaviour. There are several other proposed BESS projects in Finley, with two proposed sites (Berrigan and Finley BESS) and the Finley Solar Farm - currently operational, located adjacent/in proximity to the proposed Subject.	Section 4.3.1 of the updated FIA (Appendix D.4) notes the following: <i>“The existing Finley Solar Farm and the Finley BESS are located within the flood model extent and have been accounted for in the baseline terrain used for flood modelling. Design modelling demonstrates negligible afflux at neighbouring property boundaries, with the conservative block-fill approach representing worst-case scenario conditions. Further cumulative assessment incorporating the proposed Berrigan BESS is not currently practicable due to the absence of detailed design information (finished levels, site layout, infrastructure footprints) for that development.</i> <i>Should detailed design information for other proposed developments become available, cumulative flood impact assessment will be considered as part of the post approval detailed design flood modelling”.</i>	Appendix D.4
Request the consideration of flood resilience of the infrastructure, which is likely to be damaged or contaminated by flood water, to events up to and including the PMF. This could include placing any sensitive infrastructure such as battery storage, inverters, etc., above the PMF level, if feasible, to minimise risk to property, associated services and financial losses.	Section 4.3.1 of the updated FIA (Appendix D.4) notes the following: <i>“All critical infrastructure (battery storage, inverters, transformers, switchgear, and control systems) will be elevated to a finished floor level of 108.24 m AHD. This design provides 500 mm freeboard above the 1% AEP level (107.74 m AHD) and approximately 200 mm clearance above the modelled PMF level (108.04 m AHD),</i>	Appendix D.4

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Submission	Response	Reference location
	<i>thereby exceeding the NSW SES recommendation to place sensitive infrastructure above PMF where feasible. This approach minimises risk to property and financial losses from extreme flooding events”</i>	

5.1.8. NSW Rural Fire Service

Submission	Response	Reference location
The NSW Rural Fire Service has reviewed the information provided and advises that the development should incorporate the following mitigation measures: - Asset Protection Zones for a distance of 11 metres (as indicated in Sections 2.7 and 3.2 of the Preliminary Hazard Analysis prepared by Pando Consulting Revision 0.2 dated 21/5/2025); - Access layout generally as depicted in Figure 3.2 Project Site Layout of the Preliminary Hazard Analysis prepared by Pando Consulting Revision 0.2 dated 21/5/2025; - Access design and construction that complies with Table 7.4a of Planning for Bush Fire Protection 2019; - Static water supply (SWS) of 50,000 litres including access for fire fighting vehicles to within 4 metres of the SWS outlet; - Provision of a Fire Emergency Management Plan that at minimum includes: - Ongoing bush fire fuel management within the site (including APZs and their continued maintenance),	As part of the PHA and mitigation measure H03 of the EIS, the Project has committed to the requested mitigation measures. For clarity, mitigation measure H03 has been updated to state the individual requirements for detailed design. Mitigation measure H01 commits to the development of a Bush Fire Emergency Management and Operations Plan.	Section 5.2 and Appendix B

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Submission	Response	Reference location
- Site infrastructure plan (including but not limited to the location and capacity of stored water), - Site access and internal road plan, - Location of hazards (physical, chemical etc) that may impact on fire fighting operations, - Work that should not be carried out during Total Fire Bans, and - Has been developed in consultation with the local RFS District Office taking into account the consequence of an incident at the facility will have on emergency service resources and also any necessary site awareness training for first responders.		

5.1.9. Transport for NSW

Submission	Response	Reference location
Key issue 1: Traffic assessments		
a. Swept Path Assessments Swept path assessments have not been completed for the design heavy vehicle (i.e. 26 metre B-double, as indicated in Section 4.21 of the TIA) at impacted State Road intersections, particularly the Riverina Highway/Canalla Road intersection, as Canalla Road is not an approved B-double access road. Swept paths for the design vehicle are shown to indicate that there is	Swept path assessments have been completed showing the B-Double design vehicle undertaking concurrent left-in/ left-out and right-in/right-out movements.	Appendix D.5 (Traffic Impact Assessment, Appendix E, Sheet 04-05)

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Submission	Response	Reference location
no conflict with concurrent left-in/ left-out and right-in/right-out movements. Swept paths are to be produced in accordance with Austroads Design Vehicles and Turning Path Templates.		
b. Use of network peak hour in assessment The traffic assessments, including the turn warrant assessments, use the traffic volumes of background and construction vehicles during the peak construction timeframe, i.e. 6am – 7am. To adequately assess the ‘worst case scenario’, the traffic volumes used must be the peak construction traffic at peak construction time (plotted on the x axis) and the peak background traffic at peak network time, i.e. the 6am – 7am construction traffic volumes plus 8am – 9am background traffic volumes (plotted on the y axis). The background network peak-hour volumes must include the annual growth rate applied linearly to the peak of construction, and the cumulative traffic volumes of other projects at EIS or the approved stage that would have a coinciding construction schedule and construction traffic present in the background through or turning volumes. The traffic assessment assumptions and turn warrants assessment must be updated within the revised TIA. The strategic concept designs for the intersection of Riverina Highway/Canalla Road will need to be revised if a higher-order intersection treatment, beyond what is currently proposed (BAR/BAL), is warranted based on the revised turn-warrant assessment or provide alternative mitigation measures (i.e shuttle bus etc) to ensure that the project construction traffic volumes for the peak of construction can comply with the BAR/BAL intersection treatment.	The traffic model has been updated to assess coinciding construction traffic and network traffic peaks. A shuttle bus service has been introduced to reduce the volume of traffic accessing the key intersections during peak hours. The turn treatment assessment generates a requirement for a BAR/BAL treatment, which is proposed.	Appendix D.5 (Traffic Impact Assessment, Section 7.1)

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Submission	Response	Reference location
If the turn warrants assessment is not updated to account for the 'worst case scenario' then the construction traffic will be restricted to the project peak hour and construction traffic will not be permitted within the network peak hour.		
Key issue 2: Turn treatments and required road upgrades at Riverina Highway / Canalla Road The existing turn treatments are deficient as they do not comply with Austroads. The proponent is to provide strategic concept designs demonstrating compliance with <i>Austroads Guide to Road Design Part 4A</i> . The project intersection strategic designs must be updated based on the outcome of the updated analysis, and to ensure that the largest vehicles using the intersection can be accommodated within the pavement. TfNSW requires the following matters to be addressed in the revised TIA.		
a. Issue with existing Basic Right Turn (BAR) treatment i. The Basic Right Turn treatment on Riverina Highway, which facilitates the right turn into Canalla Road, does not comply with Austroads. The increased traffic and proposed design vehicles will exacerbate the current safety issues with the non-compliant BAR. Strategic concept designs will be required to be submitted that demonstrate the scope of the upgrades necessary to the existing BAR to achieve compliance with Austroads and TfNSW requirements. The strategic concept designs will need to address the following specific non-compliances with the existing BAR: BAR does not meet the minimum requirement for the situation whereby a road user is not allowed to enter a dedicated left turn lane to pass / navigate around a stored vehicle turning right into the side road. The proponent must design a compliant BAR intersection treatment	i. An upgraded BAR/BAL concept design has been provided allowing the B-Double design vehicle to store to undertake a right turn allowing other road users to navigate around in the left lane. Consideration of the Martenellis Road has also been considered as part of the design. The BAR/BAL design demonstrates that intended road users of each local road can safely enter/exit the state road network. ii. The hold lines are suitably set back from the Riverina Highway to ensure that vehicle paths do not cross which is confirmed by swept paths where vehicles do not cross the centre line of the approach road. It is proposed to undertake a Road Safety Audit (RSA) prior to construction. This has been included as a new mitigation measure TA06 .	Appendix D.5 (Traffic Impact Assessment, Appendix E, Sheet 01-08) Section 6 Appendix B

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Submission	Response	Reference location
and line mark the edge line at a constant 3.5m from the centreline to provide a widened shoulder to satisfy the requirement of a BAR (refer to Austroads Guide to Road Design Part 4A, Section 7). The re-design will impact the existing treatments to Marantellis/Riverina Highway. The proponent in their re-design will therefore, need to consider what an appropriate BAR treatment is for both the Canalla and Marantellis Road intersections with the Riverina Highway and ensure both roads have compliant treatments. Consideration to upgrading the intersection with opposing CHRs should be given by the proponent due to the unconventional existing intersection design. ii. A hold line is to be included set back from the through edge line to hold side road traffic free of the widened shoulder to ensure the BAR intersection treatment will operate as intended. Austroads Figure 7.1 demonstrates requirements for a compliant hold line setback. The setback should take into consideration the unconventional design of the road.		
b. Other considerations iii. Bus bays: The proponent is to demonstrate a safe and conforming solution for the intersection upgrades that take into consideration the existing bus bays. The proponent is to be aware that if modifications to the bus bays are required to achieve an optimal design, consultation will need to occur. Consideration of relocating the bus bays to allow for an improved, optimized design, should be given. There is potential for a rear end type crash when the bus bay is in use, as there appears to be insufficient offset between the intersection treatment and the bay. Line marking the edge line through at a constant offset should also be	iii. The eastbound bus bay remains as per current design. The westbound bus bay has been moved west to account for the wider Canalla Road connection to Riverina Highway. Mitigation Measure TA03 has been updated to include additional control measures for bus safety if required. It is proposed to undertake a Road Safety Audit (RSA) prior to construction. This has been included as a new mitigation measure TA06. iv. The BAR turn treatment has been designed using a C value of	Appendix D.5 (Traffic Impact Assessment, Appendix E, Sheet 01-02 and 04-10) Section 6 Appendix B Appendix D.5

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Submission	Response	Reference location
considered. iv. Road Train width requirement: The Riverina Highway is a gazetted Road Train route (i.e B-triples) at this location. The strategic concept designs are to demonstrate an increase of the width of the AUL(s) and BAR for the Canalla Road/Riverina Highway intersection to accommodate the road train heavy vehicles passing the turning project traffic. See advisory note for references to Austroads. v. Swept paths: Swept paths are required to be provided for the largest heavy vehicle and high-risk OSOM configuration (corresponding to the design and check vehicle) required to use each intersection, access point or navigate pinch points along the high-risk OSOM routes. This must be prepared following Austroads Design Vehicles and Turning Path Templates.	7.0m to accommodate the B-Triple vehicles using this route. v. Swept path assessment demonstrates all vehicles that will be using the intersections. The Riverina Highway / Canalla Road intersection swept path also shows a 19m semi-trailer accessing the site pre BAR/BAL upgrade.	Sheet 01-02
Key issue 3: High-risk OSOM route assessment		
An NHVR Route ID is to be provided for each proposed OSOM route.	NHVR Route ID provided for both OSOM routes.	Appendix D.5 (Traffic Impact Assessment, Sections 6.2.1 and 6.2.2)
Laden dimensions and weight of the vehicle configuration and loads are to be provided within the revised TIA. TfNSW is requires these dimensions in order to complete a full assessment.	Full details of the vehicle load combination have been provided	Appendix D.5 (Traffic Impact Assessment, Section 6.1 and Appendix G)

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Submission	Response	Reference location
The route assessment identifies heavy-massed and large-axle group load vehicles. Bridge and culvert assessments are required for TfNSW assets and can be obtained by contacting TfNSW Special Permits Unit via spu@transport.nsw.gov.au . The result of bridge assessments may require a change to the route which must be accounted for in the updated route assessment.	Bridge and culvert assessment request has commenced through TfNSW SPU. At the time of writing, the assessment findings are pending. .	Appendix D.5 (Traffic Impact Assessment, Section 1.3 and Appendix G)
Consider the level of escort required for the high-risk OSOM. A police escort may be required for high-risk OSOM traversing multiple lanes, as shown in the provided swept paths.	Notation added to swept path assessment where police escort is required in NSW	Appendix D.5 (Traffic Impact Assessment, Appendix A)
The route study demonstrates that medians will be tracked over, including at the intersection of the Newell Highway and Riverina Highway. The proponent is to investigate whether the high-risk OSOM can avoid tracking over any medians or other infrastructure on the state road network.	The swept path assessment at Newell Highway / Riverina Highway intersection has been redone to avoid tracking over median islands or kerbs.	Appendix D.5 (Traffic Impact Assessment, Appendix G, Sheet 30)
A light / power pole has been indicated to fall within the 0.5m vehicle clearance zone at the Newell Highway / Riverina Highway intersection, see Figure 1.	The swept path assessment at Newell Highway / Riverina Highway intersection has been redone to give suitable clearance to the power pole	Appendix D.5 (Traffic Impact Assessment, Appendix G, Sheet 30)
Key issue 5: Pre-construction minor works		

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Submission	Response	Reference location
Staging/timing of pre-construction minor works/enabling works requires clarification. The updated TIA needs to quantify the traffic volumes, timeframes, and routes (same or different from construction), as well as mitigation measures (e.g., TTM, current traffic conditions) and flow-on impacts for all stages, as required by TfNSW's Response to Secretary's Environmental Assessment Requirements (SEARs).		
The proponent is to provide a separate analysis of pre-construction minor works to the construction analysis. This should include the list of requirements provided by the SEARs, including: Identification of the traffic volumes and traffic types, inclusive of the largest design vehicle, including those specifically in the AM/PM peak hours. Swept path analysis is required for the existing intersection if concurrent turning movements for the design heavy vehicle are intended at this intersection during the pre-construction minor works phase. Identification of any measures proposed to reduce the project traffic and impacts during this period, i.e carpooling, shuttle buses, staggering of traffic and inclusion of enforceable mitigation measures that can be monitored for compliance. Provide a schedule of the proposed pre-construction minor works. Assess any overlap of construction and pre-construction minor works periods must be included in the traffic assessment for this stage, before completion of the intersection upgrade. The AM/PM peak hour must be consistent with the traffic volumes that would be generated during this period by the existing land use. Avoid network peak hours where possible. Include measures to inform the community and key stakeholders of	Available information on the Pre-Construction works has been added which demonstrates that considerably less construction traffic will use the road network during this period. Swept path assessments confirm that the current intersection can safely accommodate the expected vehicle types. Pre-construction traffic would be expected to access the project site in a manner comparable to the nearby Finley Solar Farm which is now operational. It is also noted that operational traffic generated by the Finley Solar Farm has been captured by the traffic surveys undertaken. Mitigation measure TA01 has been updated to include a cumulative traffic impacts assessment as part of the Traffic Management Plan, to ensure the proposed intersection treatment carries a safe and compliant level of traffic.	Appendix D.5 (Traffic Impact Assessment, Section 4.2) refer Sheet 10 of Appendix D.5 Section 6 Appendix B

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Submission	Response	Reference location
the increased traffic during this period. Identify any temporary widening or works that may be required to accommodate swept paths for the design vehicle during this period within a strategic concept design. No OSOM will be permitted during this period, unless swept paths are provided that demonstrate that the intersection or access will be able to accommodate the turn of the OSOM movement within the existing pavement.		
TfNSW Advisory Notes		
Strategic concept designs are required for works along the state road network route. Strategic-Design-requirements-for-DA-Factsheet.pdf	Strategic design for the BAR/BAL upgrade at Riverina Highway / Canalla Road has been provided. No other NSW State roads require works.	Appendix D.5 (Traffic Impact Assessment, Appendix E Sheet 01)
Basic Right Turn treatment must meet the requirements of Austroads Guide to Road Design Part 4A. Ensure the C value is compliant for road trains as part of Figure 7.1.	7.0m minimum C value has been used in the BAR design.	Appendix D.5 (Traffic Impact Assessment, Appendix E Sheet 01)
The updated route study must include a reference to a Route ID utilising the NHVR portal website. Route Planner Tool.	NHVR route IDs are provided for both OSOM routes.	Appendix D.5 (Traffic Impact Assessment, Sections 6.2.1 and 6.2.2)

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Submission	Response	Reference location
Bridge assessments for TfNSW assets can be obtained by contacting spu@transport.nsw.gov.au.	Contact with TfNSW SPU has been made. The application was sent on 6 February 2026 and the assessment reference number is PT3076. Follow up emails have been sent in March and May 2026, and the assessment is yet to be provided.	Appendix D.5 (Traffic Impact Assessment, Section 1.3, Appendix G)
All pavement that is to accommodate the project traffic, heavy vehicles, light vehicles, and high-risk OSOM, is to consist of permanent pavement treatments that are consistent with the existing state road pavement.	Riverina Highway / Canalla Road intersection is the only location where additional paving is required in NSW. Intersection to be upgraded to surrounding state road pavement standard.	Appendix D.5 (Traffic Impact Assessment, Appendix E Sheet 01)
It is noted that the Newell Highway section on the proposed OSOM Route crosses the non-operational CRN rail Corridor from Narrandera to Tocumwal at Tocumwal. If any adverse impacts to CRN corridors are identified, the applicant shall seek approvals from UGLRL and TfNSW. Please note that the applicant must adhere to the transport management and safety requirements of UGLRL and TfNSW for matters involving the CRN rail corridor.	THE CRN rail corridor crosses Newell Highway at Narrandera only. This crossing will not be impacted by the OSOM vehicle route. Other vehicles will follow normal protocol when using TfNSW and UGLRL assets.	N/A
If the proponent requires the use of UGLRL assets, the applicant must consult with UGLRL. This can be done through lodgement of a request for a permit via the National Heavy Vehicle portal, or directly to UGLRL via heavyvehicle@uglregionallinx.com.au. The applicant must submit the request at least two (2) months before passage and include the specifications of their OSOM and heavy vehicles (axial loading and axial spacing as well as dimensions of the heavy vehicles) with the	Heavy vehicles will follow normal protocol before using UGLRL assets through usual permit requests with NHVR.	Appendix D.5 (Traffic Impact Assessment, Section 4.3)

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Submission	Response	Reference location
lodgement of the request.		

5.1.10. Water NSW

Submission	Response	Reference location
Water NSW has reviewed the EIS and found that the proposal is not located near any Water NSW land, assets or infrastructure. Therefore, we have no comments or requirements regarding the proposal. We do note, for the applicants information, that the Ulupna 2 and Mulwala 17A (drainage) Channels are located in close proximity to the project site. If not occurring already, consultation should be undertaken with the Murray Darling Basin Authority (MDBA) regarding potential impacts on these irrigation channels.	MDBA have provided a submission to this DA, stating: <i>"Our preliminary assessment of the information available indicates the proposal is unlikely to pose any significant impacts to the water resources of the southern Murray Darling Basin"</i>	N/A

5.1.11. Transgrid

Submission	Response	Reference location
For the avoidance of doubt and ultimate flexibility, Transgrid Group requests that the development footprint be extended further south to the southern boundary of its land parcel (Lot B DP961693) to encompass the 132kV underground cable connection and potential bench extension.	The Development Footprint has been extended to the southern boundary of the land parcel. Refer to Figure 1-1 and Figure 1-2 above.	Figure 1-1 and Figure 1-2

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5.2. Council and organisation submissions

5.2.1. Berrigan Shire Council

Submission	Response	Reference location
The submitted information appears to be consistent with what the team at Samsung C&T Renewable Energy Australia (SREA) showed Council staff throughout 2025, with more details provided to address Council's comments on the SEAR. I have no further comment on the proposal at this time and await your informed assessment against all relevant policy and legislation and feedback from the community consultation.	Noted – The Applicant thanks you for your comment and collaboration on the Project.	N/A

5.2.2. Edward River Council

Submission	Response	Reference location
Council acknowledges the EIS is supported by a Landscaping and Visual Assessment provided as part of the application. The proposed project is set approximately 5km from the council LGA boundary, and it is considered unlikely there will be adverse visual impacts due to the siting. Noting this, consideration should be given to the surrounding sensitive receivers and Berrigan Shire Community.	The Visual Impact Assessment (VIA) as detailed within the EIS notes the following: • 11 non-associated receivers were identified within 2km of the Project • 2 of the non-associated receivers were identified as having a MODERATE visual impact rating • With the proposed screening, receivers with a MODERATE visual impact rating were reduced to LOW. As such, all non-associated receivers will have a LOW to NIL visual	N/A

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Submission	Response	Reference location
	impact. As such, due consideration has been given to the surrounding sensitive receivers and the Berrigan Shire Community.	
Council acknowledges the EIS is supported by a PHA, and it would be anticipated that the appropriate supporting studies and documentation be prepared as identified within the PHA recommendations.	Mitigation measure H01 states the following are required to be developed in consultation with Council and relevant emergency services prior to construction and/or occupation: • Fire safety study • Emergency response plan • Bush Fire Emergency Management and Operations Plan • Emergency Services Information Package.	Section 5.2 and Appendix B
Council acknowledges the general assessment within the EIS in relation to accommodation and employment concerns within the region and it is noted that an Accommodation and Employment Strategy will be prepared post-approval but prior to construction. As identified within the EIS, Edward River Council, the LGA and Deniliquin in particular, are facing current and significant challenges with accommodation shortages and availabilities 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.	As detailed above, an Accommodation inventory has been complete, which concludes that Finley and surrounding towns possess adequate short-term accommodation capacity to meet the Project's peak workforce needs, provided that proactive coordination occurs with local operators. The commitment for a detailed AES closer to the construction stage with updated timing and employee numbers remains, details as mitigation measure SIA01.	Appendix D.1
Council acknowledges the EIS is accompanied by a Traffic Impact	By definition, over-size over-mass (OSOM) vehicles include non	N/A

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Submission	Response	Reference location
Assessment and generally addressed road related routes, movements and likely impacts. It is noted that the subject BESS may overlap construction period with the Deniliquin BESS and Deniliquin East BESS, in addition to other REZ projects, and suitable mitigation and management measures will need to be implemented to ensure there are no significant impacts for other road users. It would be anticipated that the Projects coordinate heavy vehicle movements along the state and local road networks. ERC confirms the Project does not propose OSOM movements through Deniliquin/Cobb Highway.	high-risk vehicles such as cranes, drum rollers, dump trucks, concrete pumps, excavators, graders, compactors, cable trenching and laying equipment etc. As noted within the TIA, materials and equipment will generally be sourced from within the Berrigan Shire or surrounding LGAs where practicable, with all larger plant expected to be delivered from the Port of Melbourne. The TIA assumes heavy vehicles (including non high-risk OSOM vehicles) will have a distribution of 70% from the east and 30% from the west. As such, there is no commitment for OSOM vehicles avoiding Deniliquin/Cobb Highway. However, it is confirmed and a project commitment that all OSOM vehicles delivering plant and large project components (including the high-risk OSOM) will come from the east, avoiding Deniliquin.	

5.2.3. Murray Irrigation

Submission	Response	Reference location
Murray Irrigation notes in section 3.4.3 Water demand and supply, the supply of water for construction purposes will be sourced from the Mulwala Canal using a simple hose and pump arrangement. It is noted that an agreement with Murray Irrigation will need to be discussed prior to construction and the water will ultimately be sourced by the construction contractor. This section notes the operational water	Mitigation Measure FH09 notes that prior to construction, an appropriate water access license will be obtained and temporary water allocations purchased from the water trade market. The Project will adhere to any licensing rules and regulations. The Applicant notes in Section 3.2.3 of the EIS that transmission	Appendix B Section 3.2.3 of the EIS

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Submission	Response	Reference location
requirements would be minimal with building runoff or water delivered on-site meeting the operational needs for water. Murray Irrigation notes section 3.8.4 refers to the Mulwala Canal being drained between May – August most years for maintenance. The location of water extraction during this time will be the subject of further negotiations and consultation. Murray Irrigation notes the inclusion of the comments in section 5.4.1, early consultation with Murray Irrigation is vital, prior to construction commencing, regarding access to water from the Mulwala Canal and the transmission lines crossing the Mulwala Canal.	line crossings of the Murray Irrigation managed Mulwala No 19b channel, Essential Energy 66kV easement, and drainage easement within freehold property would be undertaken in accordance with the relevant utility authority requirements (such as the Murray Irrigation Works Policy and the EE Encroachment Process), and subject to detailed design planning and consultation.	

6. Updated mitigation measures

A full set list of safeguards and mitigation measures are provided below in Table 6-1 below details those mitigation measures that have either been amended (as shown in **red**) or added as a response to community and agency submissions:

Table 6-1 Updated mitigation measures

Mitigation number	Mitigation measure	Project Stage
Biodiversity		
B01	A Biodiversity Management Plan (BMP) would be prepared prior to construction to include all recommendations of the BDAR. It will include but not be limited to: • Unexpected Threatened Species Finds Procedure will include: ○ Stop work procedures, where relevant ○ Further surveys to delineate the population ○ AoS or liaison with appropriate agencies. • Implementation of hygiene protocols for plant and equipment entering and exiting the construction site. • Management of wastewater to the receiving environment • Clear physical demarcation of the boundary between areas to be retained and areas slated for clearing • Waste Management protocols • Weed and pathogen management plan and protocols • Clearing limits • Trained ecologist on site during clearing events • Exclusion fencing and pe-clearing surveys for Sloanes' Froglet	All Stages
B04	Retire the offsets as calculated by the BDAR in accordance with the Biodiversity Offsets Scheme	Prior to construction
Traffic and access		
TA01	A Traffic Management Plan will be developed to minimise the impact of construction traffic and would include: • Neighbours of the Project to be consulted and notified regarding the timing of major deliveries which may require additional traffic control and disrupt access	Pre construction

Mitigation number	Mitigation measure	Project Stage
	- Heavy vehicles will avoid travel during peak bus operating times (7:30am – 8:30 and, and 3:00pm – 4:00pm) - All haulage vehicles are to use the access route via: - Riverina Highway - Canalla Road - Left turn onto Broockmanns Road - Requirement for site specific TMP's that include appropriate safety signage manage traffic and guide road users including regulatory signs that dictate rules and restrictions, warning signs alerting to potential hazards, guide signs for navigation, and temporary signs for events or road works - Details of shuttle bus program including: - Limiting car parking for light vehicles on-site - Regular toolbox meeting sessions identifying method of travel to work and strongly encouraging use of the shuttle buses. - Identifying the bus drop off/pick up locations and clearly communicating these locations with the workforce. - Allocating a team member to be responsible for enforcement and management of the shuttle buses. - Identifying mechanisms to be put in place for shuttle buses so that the peak light vehicle numbers do not exceed the estimates in the TIA and final Conditions of Consent. - A Cumulative Project Impact Assessment for the Riverina Highway / Canalla Road intersection to verify construction timeframes and that the intersection carries a safe and compliant level of traffic. - Mitigation measuresTA01 to TA04.	
TA03	On-site mitigation measures would be included in the TMP and would include - On-site speed restrictions - Dust suppression - Loading and unloading would occur within the work area, not on streets or roads - All vehicles associated with the Project would park onsite - Carparking and loading areas to be designed in accordance with the relevant Australian - Where required, additional traffic control measures, driver	All stages

Mitigation number	Mitigation measure	Project Stage
	briefings, and communication protocols will be implemented to maintain the safety and reliability of school bus services and school children within the project area.	
TA06	A design stage Road Safety Audit (RSA) will be undertaken prior to construction.	Prior to construction
Hazards		
H01	The following plans are to be developed in consultation with Council and relevant emergency services prior to construction or occupation (as required): • Fire safety study • Emergency response plan • Bush Fire Emergency Management and Operations Plan ○ Detailed measures to prevent or mitigate fires igniting ○ Work that should not be carried out during total fire bans ○ Availability of fire-suppression equipment, access and water ○ Storage and maintenance of fuels and other flammable materials ○ Notification of the local NSW RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation, proposed to be carried out during a bush-fire fire danger period to ensure weather conditions are appropriate ○ Appropriate bush fire emergency management planning • Emergency Services Information Package. The results of the PHA should be incorporated as inputs into these plans.	Prior to construction Prior to occupation
H03	The detailed design of the BESS will comply with the requirements of the layout plans and Sections 2.7, 3.2 and 4.4 of the approved PHA, including separation distances, UL9540A test reports, relevant version of the Planning for Bushfire Protection Guideline, and OEM recommendations. During the early phase of detailed design, the Applicant will confirm the proposed fire-fighting strategy in consultation with relevant emergency services. The detailed design phase will also incorporate: • Provision for containment and management of contaminated	Design

Mitigation number	Mitigation measure	Project Stage
	fire-fighting water, including the design of impervious surfaces, bunding, sumps, or isolation valves to prevent release to stormwater or natural waterways Early and ongoing consultation with relevant emergency services to review fire-fighting system design, access, containment measures, and emergency management arrangements, consistent with guidance in the FRNSW <i>Technical Information Sheet – Large-Scale External Li-BESS Fire Safety Study Considerations (2023)</i>.	
Water resources and flooding		
FH01	Increase levels to maintain adequate freeboard of BESS infrastructure to ensure the site is constructed above the 1% AEP and PMF event to reduce risk from flooding.	All stages.
FH11	Detailed design will be incorporated into the hydraulic model to investigate flood behaviour. The outcomes of the modelling will be documented in an updated Flood Impact Assessment, in consultation with Council and relevant emergency services. Flood impacts should not increase or significantly change as a result of the detailed design.	Design
Soils		
SO6	Development of a Pest and Weed Management Plan suitable for irrigated agriculture and the irrigation system to manage: - Biosecurity - Pest animals - Weeds. The management plan will incorporate: - Vehicle hygiene and washdown procedures - Targeted pest and vermin management procedures - Targeted weed management plan (as required).	All stages
Land use compatibility		
LU04	Land forming would return the site to the preexisting slope and flat features suitable for flood irrigation practices draining to the south (existing drainage), and will recognise historic irrigated land uses at the site and in the vicinity.	Decommissioning

7. Project justification

7.1. Evaluation, subsequent to Project changes

In response to submissions received, six mitigation measures have either been added or amended, and one mitigation measure removed to address environmental concerns raised by agencies, SIG, organisations and the public.

As detailed above, the proposed amendments are not a result of the public submissions received on the EIS, rather a result of additional consultation by the Applicant with Transgrid, and additional requirements from TfNSW and DPHI - Hazards. As such, these amendments are covered in detail within the Amendment Report.

7.2. Ecologically sustainable development

Ecologically Sustainable Development (ESD) involves the effective integration of social, economic and environmental considerations in decision-making processes. In NSW, the concept has been incorporated into legislation including the EP&A Act, the EP&A Regulation and the Protection of the Environment Administration Act 1991 (NSW).

The Project has considered and addressed the principles of ESD, which involved the effective integration of social, economic and environmental considerations in decision making processes. With reference to the South Coree BESS.

- The precautionary principle has been adopted in the assessment of impact all potential impacts have been considered and mitigated commensurate with risk. Where uncertainty exists, measures have been included to address the uncertainty.
- Potential impacts have been assessed as likely to be localised and reversible and would not diminish the options regarding land and resource uses and biodiversity conservation available to future generations.
- The Project would disturb areas of highly degraded agricultural land and previously disturbed habitat. The assessment has identified that the works would not impact significantly on the biological diversity and ecological integrity of the locality.
- Iterations of the design of the Project has incorporated avoidance, minimisation and mitigation of impacts. The Project does not impact on any trees.
- Visual impacts have been minimised by locating the BESS nearby to existing substation which forms part of the landscape character and vegetation screening.

Based on the likely costs and benefits of the proposed BESS, the Project is considered to comply with the principles of ESD.

The aims, structure and content of the EIS have incorporated ESD principles. The mitigation measures in Appendix B provide an auditable set of environmental management commitments to these parameters. Based on the social and environmental benefits accruing from the Proposal at a local and broader level, and the assessed impacts on the environment and their ability to be managed, it is considered that the Proposal would be ecologically sustainable within the context of ESD.

7.3. Overall justification

The Project as presented in the EIS meets all relevant planning provisions and guidelines and is considered justifiable and acceptable. On balance, the Project is considered appropriate to both:

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- The Site's location, being located within close proximity to an existing substation and is nearby the South West REZ
- The Site's environmental values and the values identified by the local and broader community; impacts have generally been assessed as low, and mitigation strategies with high confidence have been adopted in consultation with potentially impacted landholders to manage residual risks.

The Project objectives centre on the construction of a viable and appropriate energy storage facility that will provide a meaningful contribution to the state's transition to renewable energy. Additional storage provided by this project will better integrate the contribution of renewables and should act to stabilise the grid and drive prices down. These objectives are considered achievable.

The Project aims to construct and operate the BESS within a site that minimises potential environmental impacts. The land is sited within a suitable planning context, low environmental impacts (such as biodiversity, heritage, hydrology, traffic, noise and social) within proximity to existing electrical infrastructure, and on a location that maximises land use outside the central township of Finley.

The broader context of the Project and the Projects' ability to deliver strategic benefits in this context are also provided. These demonstrate a Project which is

- Responsive to local matters
- Significant in terms of local economic benefits
- Important in the energy storage sector.

The feasibility of alternatives is considered in the EIS, which concludes that the benefits of the Project would outweigh the impacts. The Project has been designed to be responsive to the features of the Project Site:

- Land: The landowner supports the Project and has entered into an agreement for the development.
- Environment: The open landscape (minimal trees) and current agricultural use means the design can be flexible to avoid any sensitive areas.
- Community: Low rural settlement density and the ability to provide large setback distances to neighbouring dwellings will reduce potential for community impacts.
- Council: The Council is generally supportive and recent community engagement has indicated there is no strong opposition to the Project.
- Planning: The State Government and local Council are supportive and there is a well-defined planning approvals pathway to assess the Project.
- NEM: The ability to connect to the BESS directly to the grid via the adjacent Transgrid 132kV substation brings significant benefits as the network has the capacity to absorb the energy stored within the BESS and deliver it anywhere in the network.
- Design: The preliminary design, as shown in the Indicative Infrastructure Layout, has demonstrated a viable project while minimising any potential impacts to the environment or the local and regional community.

If constructed the Project will address the following key issues identified in the EIS

- Assist Australia's energy transition from fossil fuels to renewable energy and contribute to achieving net-zero emissions by 2050
- Provide system strength services to the transmission (and distribution) networks in the area and therefore provide security of supply and safeguard the energy network
- Increase economic activity locally and more broadly through grid investment
- Deliver direct employment and labour opportunities
- Avoid, minimise, and mitigate adverse impacts on the environment and community during construction and operation

- Establish a strong network of positive relationships within the local community
- Make efficient use of existing electrical infrastructure, notably Finley Substation.

7.4. Alignment with government policies and statutory requirements

The South Coree BESS is appropriately located to support grid firming in a region transitioning to renewable generation sources. The Project strategically located within close proximity to an existing substation and is nearby the South West REZ. If constructed the Project would have a contribution to storing power and stabilising the grid for an estimated 30 years.

As detailed in the EIS, the Project is in alignment with local, state and Australian government policies related to this transition including:

- 2024 Integrated System Plan (ISP)
- Climate Change (Net Zero Future) Act 2023
- NSW Net Zero Plan
- NSW Electricity Infrastructure Roadmap (2020)
- NSW Transmission Infrastructure Strategy (2018)
- NSW Electricity Strategy (2019)
- Riverina Murray Regional Plan 2041
- Berrigan Local Environmental Plan 2013
- Berrigan Shire Local Strategic Planning Statement 2020-2042
- Berrigan Shire Community Strategic Plan 2040
- Berrigan Shire Council Energy Strategy 2021

7.5. Conclusion

If the Project were not to proceed, the Project's benefits, including contributing to network stability would not be realised. BESS are needed in NSW and the Project is proposed in very close proximity to the existing Finley Transgrid substation and minimises the need for additional transmission connection infrastructure. The environmental and social impacts of the Project can be readily managed with the implementation of the existing and updated mitigation measures specifically designed for this Project in response to the identified need. The project is considered to be justified and in the public interest.

8. References

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Appendix A Submissions register

Group	Submission ID (Public and SIG)	Name and location (for individuals)	Section where the submission is addressed in the report.
Public	SE-100314233	Ian Mcdonald Walcha New South Wales 2354	Section 4.1.1, 4.3.1, 4.3.3, 4.3.5, 4.4.1
	SE-100598459	Withheld Withheld Coolah New South Wales 2843	Section 4.3.1, 4.3.3, 4.5.2
	SE-101119957	Withheld Withheld Harefield New South Wales 2650	Section 4.1, 4.3.1, 4.3.3, 4.3.4, 4.4.1, 4.5.2
	SE-101121710	Withheld Withheld Wagga Wagga New South Wales 2650	Section 4.1, 4.3.1, 4.3.2, 4.3.3
	SE-101126457	Withheld Withheld Kepnock Queensland 4670	Section 4.3.2, 4.3.3, 4.5.1
	SE-101129708	Withheld Withheld Griffith New South Wales 2680	Section 4.1, 4.3.1, 4.3.2, 4.3.3, 4.5.1
	SE-101143459	Withheld Withheld Wagga Wagga New South Wales 2650	Section 4.3.1, 4.3.3, 4.3.4, 4.4.1, 4.5.2, 4.5.4
	SE-101149223	Withheld Withheld Hay New South Wales 2711	Section 4.3.1, 4.3.3, 4.3.4, 4.3.5, 4.5.4
	SE-101191964	Withheld Withheld Hay New South Wales 2711	Section 4.3.1, 4.3.2, 4.5.1, 4.5.2
	SE-101197980	Withheld Withheld Hay New South Wales 2711	Section 4.5.1 4.5.2 4.5.4
	SE-101198216	Withheld Withheld Lancefield Victoria 3435	Section 4.3.1, 4.3.2, 4.3.6
	SE-101209207	Withheld Withheld Springfield_Q Queensland 4300	Section 4.1.1, 4.3.1, 4.3.2, 4.3.3, 4.4.1, 4.5

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Group	Submission ID (Public and SIG)	Name and location (for individuals)	Section where the submission is addressed in the report.
	SE-101210210	Withheld Withheld Redbank Plains Queensland 4301	Section 4.3.1, 4.4.1, 4.5, 4.5.1
	SE-101216207	Withheld Withheld Leeton New South Wales 2705	Section 4.3.1, 4.3.2, 4.3.3, 4.4.1, 4.5
	SE-101216213	Withheld Withheld Leeton New South Wales 2705	Section 4.3.2, 4.3.3, 4.3.4, 4.3.6
	SE-101239467	Withheld Withheld Swan Hill Victoria 3585	Section 4.3.3, 4.5.1
	SE-101241458	Withheld Withheld Cunninyeuk New South Wales 2734	Section 4.3.2, 4.3.3
	SE-101243707	Withheld Withheld Cunninyeuk New South Wales 2734	Section 4.1.1, 4.3.3, 4.4.1, 4.5.1
	SE-101244211	Withheld Withheld Swan Hill Victoria 3585	Section 4.3.2, 4.3.4
	SE-101244229	Withheld Withheld Swan Hill Victoria 3585	Section 4.1.1, 4.3.3
	SE-101249957	Withheld Withheld Swan Hill Victoria 3585	Section 4.1.1, 4.3.1, 4.3.3, 4.4.1, 4.5.1
	SE-101330496	Withheld Withheld Swan Hill Victoria 3585	Section 4.1.1, 4.3.1, 4.3.3, 4.3.6, 4.5.2, 4.5.4
	SE-101339716	Withheld Withheld Moulamein New South Wales 2733	Section 4.1.1, 4.3.1, 4.3.3
	SE-101340488	Annette Smith Hay New South Wales 2711	Section 4.3.1, 4.3.3, 4.3.4, 4.3.6, 4.3.7
	SE-101345707	Withheld Withheld Tyntynder South Victoria 3586	Section 4.1.1, 4.3.1, 4.5.1
	SE-101349966	Withheld Withheld Wagga Wagga New South Wales 2650	Section 4.1.1, 4.3.1, 4.5.1
	SE-101357708	Withheld Withheld Coolah New South Wales 2843	Section 4.3.1, 4.3.3, 4.4.1, 4.5.3

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Group	Submission ID (Public and SIG)	Name and location (for individuals)	Section where the submission is addressed in the report.
	SE-101357710	Withheld Withheld Coolah New South Wales 2843	Section 4.1.1, 4.5.1
	SE-101359208	Withheld Withheld Barham New South Wales 2732	Section 4.3.4, 4.3.6
	SE-101359211	Withheld Withheld Moulamein New South Wales 2733	Section 4.3.1, 4.3.4
	SE-101359212	Withheld Withheld Barham New South Wales 2732	Section 4.3.1, 4.3.2, 4.3.6,
	SE-101359215	Withheld Withheld Gannawarra Victoria 3568	Section 4.5.2
	SE-101359217	Withheld Withheld Swan Hill Victoria 3585	Section 4.3.2, 4.3.4, 4.3.5, 4.3.6
	SE-101359222	Withheld Withheld Moulamein New South Wales 2733	Section 4.3.6
	SE-101360216	Withheld Withheld Moulamein New South Wales 2733	Section 4.3.2, 4.3.4, 4.3.6
	SE-101360218	Withheld Withheld Swan Hill Victoria 3535	Section 4.3.2, 4.3.6
	SE-101360221	Withheld Withheld Moulamein New South Wales 2733	Section 4.3.1, 4.3.2, 4.3.6
	SE-101360224	Withheld Withheld Swan Hill Victoria 2585	Section 4.3.1, 4.3.2, 4.3.5, 4.3.6,
	SE-101360226	Withheld Withheld Gannawarra Victoria 3568	Section 4.3.2
	SE-101360229	Withheld Withheld Barham New South Wales 2732	Section 4.3.2, 4.3.6
	SE-101360232	Withheld Withheld Moulamein New South Wales 2733	Section 4.3.1, 4.3.2
	SE-101360234	Withheld Withheld Gannawarra Victoria 3568	Section 4.3.2, 4.3.4, 4.3.5
	SE-101360461	Withheld Withheld Barham New South Wales 2732	Section 4.5.1

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Group	Submission ID (Public and SIG)	Name and location (for individuals)	Section where the submission is addressed in the report.
	SE-101360707	Withheld Withheld Horsham Victoria 3400	Section 4.3.1, 4.3.3
	SE-101361457	Withheld Withheld Moulamein New South Wales 2733	Section 4.3.1
	SE-101361459	Withheld Withheld Barham New South Wales 2732	Section 4.3.1, 4.3.2, 4.1.1
	SE-101361462	Withheld Withheld Moulamein New South Wales 2733	Section 4.3.1
	SE-101362207	Withheld Withheld Romsay Victoria 3585	Section 4.3.1
	SE-101362211	Withheld Withheld Moulamein New South Wales 2733	Section 4.3.1
	SE-101362460	Withheld Withheld Moulamein New South Wales 2733	Section 4.1.1, 4.3.1, 4.3.2, 4.5.2
	SE-101362462	Withheld Withheld Moulamein New South Wales 2733	Section 4.1.1, 4.3.1, 4.3.3, 4.3.6
Special interest groups	SE-101132220	Noel Hicks Griffith New South Wales 2680	Section 4.3.1, 4.3.2, 4.3.5
	SE-101191958	John Clark Hay New South Wales 2711	Section 4.3.1, 4.3.4, 4.3.5, 4.3.7
	SE-101205214	John Mcbratney Lancefield Victoria 3435	Section 4.3.1, 4.3.4, 4.3.6
	SE-101209975	Eunice Steinhardt Redbank Plains Queensland 4301	Section 4.3.2, 4.3.3, 4.3.4, 4.3.5, 4.3.7, 4.5.3
	SE-101233749	Tegan Hare Swan Hill New South Wales 3585	Section 4.3.1, 4.3.2, 4.3.5
	SE-101244715	Cedric Creed Goovigen Queensland 4702	Section 4.1.1, 4.3.1, 4.3.3, 4.3.5, 4.3.7, 4.4.1, 4.5.1, 4.5.2
	SE-101358208	Lynette Lablack Wagga Wagga New South Wales 2650	Section 4.1.1, 4.3.1, 4.3.2, 4.3.3, 4.3.5,

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Group	Submission ID (Public and SIG)	Name and location (for individuals)	Section where the submission is addressed in the report.
	SE-101359456		4.3.7, 4.4.1, 4.5.1, 4.5.2
	SE-101360208	Jeffery Maney Barham New South Wales 2732	Section 4.3.2, 4.3.5, 4.3.7
	SE-101360457	Hare Ann Moulamein New South Wales 2733	Section 4.3.1
	SE-101362457	Phoebe Ruth Romsay Victoria 3434	Section 4.3.1, 4.3.2, 4.5.3

Appendix B Consolidated Mitigation measures

A full set list of safeguards and mitigation measures are provided below. New mitigation measures and those that have been amended are shown in **red**.

Mitigation number	Mitigation measure	Project Stage
Biodiversity		
B01	A Biodiversity Management Plan (BMP) would be prepared prior to construction to include all recommendations of the BDAR. It will include but not be limited to: • Unexpected Threatened Species Finds Procedure will include: ○ Stop work procedures, where relevant ○ Further surveys to delineate the population ○ AoS or liaison with appropriate agencies. • Implementation of hygiene protocols for plant and equipment entering and exiting the construction site. • Management of wastewater to the receiving environment • Clear physical demarcation of the boundary between areas to be retained and areas slated for clearing • Waste Management protocols • Weed and pathogen management plan and protocols • Clearing limits • Trained ecologist on site during clearing events • Exclusion fencing and pe-clearing surveys for Sloanes' Froglet	All Stages
B02	As part of the overall Environmental Management System (EMS) to ensure protection of waterways: • Preparation of a Stormwater Management Plan (SWMP) and Erosion Sediment Control Plan (ESCP) in accordance with the 'Blue book' (Landcom, 2004).	Prior to construction
B03	Adaptive management strategy to prevent trampling of unexpected threatened flora. • All plans will be progressively reviewed and updated throughout all stages • All adaptive management strategy plans including the BMP will form part of an overall Environmental management strategy.	All Stages

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Mitigation number	Mitigation measure	Project Stage
B04	Retire the offsets as calculated by the BDAR in accordance with the Biodiversity Offsets Scheme	Prior to construction
Aboriginal Heritage		
AH01	The Environment Management System (EMS) would incorporate safeguards and mitigation relevant to Aboriginal heritage, including an unexpected finds protocol for Aboriginal objects (refer Appendix B1, of the ACHA) Aboriginal heritage should also be included in any induction for the Project.	All stages
AH02	If unexpected Aboriginal objects are identified during works the relocation of the objects should be undertaken by a qualified archaeologist with a representative of the RAPs, as selected by the Proponent/Project Owner, and be consistent with Requirement 26 of the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> . The relocation area must be within the Subject Lots in an area that will not be disturbed into the future. If an alternative relocation area outside the Subject Lots for the Project is required due to unforeseeable reasons, additional consultation with the RAPs must occur.	All stages
AH03	In the unlikely event that human remains are discovered during the development works, all work must cease in the immediate vicinity and the unexpected find protocol followed. The local NSW police must be notified. Further assessment would be undertaken to determine if the remains were ancestral Aboriginal or not. In the event that any remains are determined to be ancestral Aboriginal in origin Heritage NSW must be notified.	All stages
AH04	Further archaeological assessment would be required if the proposed development activity extends beyond the area assessed. This would include consultation with the RAPs and may include further field survey.	All stages
Access and Traffic		
TA01	A Traffic Management Plan will be developed to minimise the impact of construction traffic and would include: Neighbours of the Project to be consulted and notified	Pre construction

Mitigation number	Mitigation measure	Project Stage
	regarding the timing of major deliveries which may require additional traffic control and disrupt access - Heavy vehicles will avoid travel during peak bus operating times (7:30am – 8:30 and, and 3:00pm – 4:00pm) - All haulage vehicles are to use the access route via: - Riverina Highway - Canalla Road - Left turn onto Broockmanns Road - Requirement for site specific TMP's that include appropriate safety signage manage traffic and guide road users including regulatory signs that dictate rules and restrictions, warning signs alerting to potential hazards, guide signs for navigation, and temporary signs for events or road works - Details of shuttle bus program including: - Limiting car parking for light vehicles on-site - Regular toolbox meeting sessions identifying method of travel to work and strongly encouraging use of the shuttle buses. - Identifying the bus drop off/pick up locations and clearly communicating these locations with the workforce. - Allocating a team member to be responsible for enforcement and management of the shuttle buses. - Identifying mechanisms to be put in place for shuttle buses so that the peak light vehicle numbers do not exceed the estimates in the TIA and final Conditions of Consent. - A Cumulative Project Impact Assessment for the Riverina Highway / Canalla Road intersection to verify construction timeframes and that the intersection carries a safe and compliant level of traffic. - Mitigation measures TA01 to TA04.	
TA02	Implement a community information and awareness program to inform the community of traffic disruptions. This would include; - Press releases in local newspapers. - Specific emails, newsletters and individual letter drops to neighbouring residents along the access route to the Project. - Provision of a website providing details of the status of works and contact details for complaints or enquiries.	All stages

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Mitigation number	Mitigation measure	Project Stage
	- Provide key contact personnel and contact details, including out of hours contact information to residents, schools, public activities and business operating alongside the local route. - Neighbours of the BESS would be consulted and notified regarding the timing of major deliveries which may require additional traffic control and disrupt access.	
TA03	On-site mitigation measures would be included in the TMP and would include - On-site speed restrictions - Dust suppression - Loading and unloading would occur within the work area, not on streets or roads - All vehicles associated with the Project would park onsite - Carparking and loading areas to be designed in accordance with the relevant Australian Where required, additional traffic control measures, driver briefings, and communication protocols will be implemented to maintain the safety and reliability of school bus services and school children within the project area.	All stages
TA04	Driver Protocols would be included in the TMP and would include - All vehicles would enter and exit the site in a forward direction - Heavy vehicles will avoid peak school bus times - Safety initiatives to minimise risk and disruption to residential and or school bus zones would be implemented - Vehicles would only utilise designated transport routes - Construction vehicle movements are to abide by finalised heavy vehicles schedules as agreed and permitted by the relevant authorities. - All permits for working within the road reserve must be received from the relevant authority prior to works commencing.	All stages
TA05	Schedule of Road upgrades would be included in the TMP and would include - Dilapidation surveys and necessary road maintenance of Canalla Road and Broockmanns Road on the Project access route (as required) - Minor roadworks where required (TIA Section 6.5) would be	All stages

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Mitigation number	Mitigation measure	Project Stage
	undertaken prior to works commencing.	
TA06	A design stage Road Safety Audit (RSA) will be undertaken prior to construction.	Prior to construction
Hazards		
H01	The following plans are to be developed in consultation with Council and relevant emergency services prior to construction or occupation (as required): • Fire safety study • Emergency response plan • Bush Fire Emergency Management and Operations Plan ○ Detailed measures to prevent or mitigate fires igniting ○ Work that should not be carried out during total fire bans ○ Availability of fire-suppression equipment, access and water ○ Storage and maintenance of fuels and other flammable materials ○ Notification of the local NSW RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation, proposed to be carried out during a bush-fire fire danger period to ensure weather conditions are appropriate ○ Appropriate bush fire emergency management planning • Emergency Services Information Package. • The results of the PHA should be incorporated as inputs into these plans.	Prior to construction Prior to occupation
H02	APZs to be maintained in accordance with Appendix 4 of PBP for the life of the Project	Design
H03	The detailed design of the BESS will comply with the requirements of the layout plans and Sections 2.7, 3.2 and 4.4 of the approved PHA, including separation distances, UL9540A test reports, relevant version of the Planning for Bushfire Protection Guideline, and OEM recommendations. During the early phase of detailed design, the Applicant will confirm the proposed fire-fighting strategy in consultation with relevant emergency services. The detailed design phase will also incorporate:	Design

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Mitigation number	Mitigation measure	Project Stage
	- Provision for containment and management of contaminated fire-fighting water, including the design of impervious surfaces, bunding, sumps, or isolation valves to prevent release to stormwater or natural waterways - Early and ongoing consultation with relevant emergency services to review fire-fighting system design, access, containment measures, and emergency management arrangements, consistent with guidance in the FRNSW <i>Technical Information Sheet – Large-Scale External Li-BESS Fire Safety Study Considerations (2023)</i>.	
H04	Dangerous or hazardous materials shall be stored and handled in accordance with AS1940-2004: The storage and handling of flammable and combustible liquids.	Design Construction Operation
H05	All recommendations from the Victorian Big Battery Fire Statement of Technical Findings – Victorian Government 2021 will be implemented.	Design
Visual amenity		
VA01	Building design - Consider use of materials that integrate with the surrounding landscape - Where practicable use suitable colours and finishes for project infrastructure to minimise visual impacts - Where practicable Noise wall be painted in a neutral colour (not white)	Design
VA02	Dark Sky Planning guidelines and national light Pollution Guidelines for Wildlife will be considered during detailed design Cut off and direct light fittings (or similar technologies would be used where appropriate to minimise glare and light spill onto private property).	Design
VA03	Landscaping will be installed in accordance with the conceptual landscape plan, including screen planting along the east and south of the BESS facility. The final location and extent of landscaping will be determined during detailed design. During detailed design would consider the key principals: Planting should remain in keeping with existing landscape	Design

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Mitigation number	Mitigation measure	Project Stage
	character - Species selection is to be typical of the area - Planting layout should avoid screening views of the broader landscape - Avoid the clearing of existing vegetation. Where appropriate reinstate any lost vegetation - Allow native vegetation to regrow over any areas of disturbance	
Noise and vibration		
NV01	Establish a complaints procedure including signage and other means to advertise the contact number regarding complaints. Respond to complaints in a timely manner and keep relevant parties informed of progress.	All stages
NV02	Noise impacts to the associated receiver R1 are subject to the landowner agreement and detailed design. This may include implementation of a noise wall along the site boundary. at property treatment or other compensatory measures in accordance with the agreement.	All stages
NV03	For construction works conducted within close proximity to the dwelling / building of Receiver R1, potential noise exceedances to this receiver would be managed by implementing time restrictions and/or providing periods of repose for residents, where feasible and reasonable.	During construction
NV04	The following noise management measures should be considered as part of a Noise Management Plan. - Plant and equipment should be properly maintained - Avoid any unnecessary noise when carrying out manual operations and when operating plant - Any equipment not in use for extended periods during construction work should be switched off. - Good relations with people living and working in the vicinity of a construction site should be established at the beginning of a project and be maintained throughout the project - Keep people informed of progress and take complaints seriously - The person selected to liaise with the community should be adequately trained and experienced in such matters.	Prior to and during construction

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South Coree Battery Energy Storage System

Mitigation number	Mitigation measure	Project Stage
Water resources and flooding		
FH01	Increase levels to maintain adequate freeboard of BESS infrastructure to ensure the site is constructed above the 1% AEP and PMF event to reduce risk from flooding.	All stages.
FH02	Develop Flood Emergency Response Plan (FERP)	Prior to construction
FH03	A Fire Water Management Procedure would be included within the Emergency Response plan in accordance with CFA guidelines, applicable Australian Standards for handling hazardous materials and EPA regulations.	Design
FH04	Erosion and sediment control measures will be implemented to mitigate any impact in accordance with Managing Urban Stormwater: Soils & Construction (Landcom, 2004), including for water access at any location.	Prior to construction Construction
FH05	All staff would be appropriately trained in the minimisation and management of accidental spills.	All stages.
FH06	The refuelling of plant and machinery would be undertaken in impervious bunded areas on hardstand areas only.	All stages
FH07	Machinery would be checked daily to ensure there is no oil, fuel or other liquids leaking from the machinery. All staff would be appropriately trained through toolbox talks for the minimisation and management of accidental spills.	Construction Operation
FH08	An incident management procedure to address any spills and pollution incidents will be developed and implemented. The procedure would be incorporated into the Construction and Operation Environmental Management Plans and include a requirement to notify EPA for incidents that cause material harm to the environment (refer s147-153 Protection of the Environment Operations Act).	All stages
FH09	Prior to construction, an appropriate water access license will be obtained and temporary water allocations purchased from the water trade market. The Project will adhere to any licensing rules and regulations.	Prior to construction Construction Operation

Submissions Report

South Coree Battery Energy Storage System

Mitigation number	Mitigation measure	Project Stage
FH10	Ensure appropriate drainage controls are incorporated into the design to minimise the area of disturbance, runoff and pollutant generation. This would include consideration of water used during and emergency fire event.	Design
FH11	Detailed design will be incorporated into the hydraulic model to investigate flood behaviour. The outcomes of the modelling will be documented in an updated Flood Impact Assessment, in consultation with Council and relevant emergency services. Flood impacts should not increase or significantly change as a result of the detailed design.	Design
Soils		
SO1	Progressive and adaptive Erosion and Sediment Control Plans (ESCP) and Soil and Water Management Plan (SWMP) will be prepared for the Project in accordance with Landcom Soils and Construction: Managing Urban Stormwater (Landcom, 2004) and include, but not be limited to: • Minimising the extent and duration of ground disturbance • Progressive rehabilitation of disturbed areas • Stockpile management of topsoil to prevent soil structural decline. Topsoil will be stripped and stockpiled separately. Stockpiles will be stabilised with a groundcover (i.e. geotextile or similar) if stockpiling is required for more than six weeks • Spill Response Procedure • Unexpected Finds Procedure, for contaminated soil • Maintain at least 70% groundcover where applicable throughout the site during operation to reduce the risk of erosion	All stages
SO2	A comprehensive agronomic nutrient soil survey sampling and analysis prior to construction to establish a baseline nutrient data set would be undertaken to: • Support rehabilitation of the Project Site land to Class 3 Agricultural land on decommissioning. • Support preparation of the vegetative screening area to provide a growing environment which is conducive to achieving a successful vegetative screen.	Pre construction Decommissioning
SO3	A Revegetation and Rehabilitation Plan for decommissioning will be prepared and include stabilisation and topsoil amelioration (e.g., incorporation of organic matter to improve soil structure or gypsum to improve structure, reduce hard-setting surfaces and reduce soil	Decommissioning

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South Coree Battery Energy Storage System

Mitigation number	Mitigation measure	Project Stage
	dispersion).	
SO4	Avoid altering the groundwater and surface water regime to prevent mobilisation of any salt stores, however low, in the soil.	All phases
SO5	Reference the soil survey results (this document), Australian Soil and Land Survey Handbook (CSIRO, 2009), Guidelines for Surveying Soil and Land Resources (CSIRO, 2008) and the Land and Soil Capability Assessment Scheme: second approximation (NSW OEH, 2012) when returning the site to the BESS farmland capability	Decommissioning
SO6	Development of a Pest and Weed Management Plan suitable for irrigated agriculture and the irrigation system to manage: • Biosecurity • Pest animals • Weeds. The management plan will incorporate: • Vehicle hygiene and washdown procedures • Targeted pest and vermin management procedures • Targeted weed management plan (as required).	All stages
SO7	A post decommissioning PSI with supplementary soil testing would be undertaken with recommendation to a detailed site investigation if required. This would occur prior to significant soil disturbance.	Decommissioning
Land use compatibility		
LU01	A Revegetation and Rehabilitation Plan is to be prepared in consultation with NSW Department of Primary Industries prior to decommissioning to return the land to safe and productive agricultural land.	Decommissioning
LU02	All above ground and below ground cabling and infrastructure would be removed,	Decommissioning
LU03	An agronomic soil survey would be undertaken prior to construction and post decommissioning to inform soil nutrient amelioration prior to revegetation.	Decommissioning
LU04	Land forming would return the site to the preexisting slope and flat features suitable for flood irrigation practices draining to the south (existing drainage), and will recognise historic irrigated land uses at the	Decommissioning

Submissions Report

South Coree Battery Energy Storage System

Mitigation number	Mitigation measure	Project Stage
	site and in the vicinity.	
Non-Aboriginal heritage		
NAH1	Should an item of historic heritage be identified, the Heritage NSW would be contacted prior to further work being carried out in the vicinity in accordance with the Non-Aboriginal Heritage unexpected finds procedure in the EIS.	All Stages
Social and economic impacts		
SIA01	Community and Stakeholder Engagement Strategy would be prepared. The following key engagement needs that have been identified for stakeholder and community engagement in the upcoming phases of the Project would be included in the strategy: • Ensure open, transparent, timely, and accessible communication of Project information to reduce uncertainty and address community concerns. • Proactively address both real and perceived concerns about potential amenity and safety impacts, including traffic, noise, visual changes, and environmental impacts. • Maintain regular engagement with local councils, particularly during the construction phase, to monitor, discuss, and adaptively respond to emerging concerns from the community and local businesses. • Develop accessible and responsive grievance and remedy mechanisms to ensure that community concerns and complaints are handled appropriately and fairly. • Clearly communicate accommodation arrangements for both construction and operational workforces, including their expected footprint and duration. • Provide robust engagement with the community to address and alleviate concerns based on perception as well as technical realities. • Collaborate with local councils and relevant regional stakeholders to support initiatives that promote regional economic and social development. • Engage economic development agencies to share and promote	Prior to construction

Submissions Report

South Coree Battery Energy Storage System

Mitigation number	Mitigation measure	Project Stage
	the Project's positive outcomes, showcasing the renewable energy industry's contribution to the region.	
SIA02	An Accommodation and Employment Strategy (AES) would be prepared. To mitigate potential impacts on housing and accommodation within the Project's social locality, it is recommended that the AES be developed in consultation with local Councils and key stakeholders. The AES should: - Propose measures to ensure an adequate supply and availability of accommodation for both construction and operational workforces. - Prioritise accommodation options that minimise adverse social impacts on local communities, particularly those related to housing affordability and availability for existing residents. - Collaborate with the Council and local stakeholders to undertake an inventory of under-utilised buildings that could be repurposed as temporary workforce accommodation. - Facilitate the employment of local residents wherever feasible, including through the use of locally registered contractors who may already employ a local workforce. This approach can reduce the need for importing labour and minimise accommodation pressure. - Engage with education and training providers such as TAFE to identify local skills gaps and sponsor upskilling or certification programs aligned with Project workforce needs, contributing to regional capacity building. - Develop and implement workforce behaviour and safety policies, including clear expectations for conduct while in transit, on-site, in accommodation, and when interacting with local communities. Where possible, coordinate with community liaison officers or representatives from other renewable energy or major infrastructure projects in the region to ensure a harmonised approach to workforce management and minimise cumulative impacts on local housing, services, and businesses.	Prior to construction
SIA03	A Community Benefit Sharing Program (CBSP) implemented as part of the Voluntary Planning Agreement (VPA) would be prepared with the aim to maximise benefits for local community members throughout the	Prior to construction

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South Coree Battery Energy Storage System

Mitigation number	Mitigation measure	Project Stage
	Project lifecycle. The Applicant has committed to entering into a VPA for the Project with the Council. The CPSP will: • Ensure initiatives offer ongoing opportunities for meaningful community involvement and decision-making. • Include representation from Traditional Owners and other key local Aboriginal stakeholders to uphold inclusive and culturally respectful engagement. In addition to the CBSP, the Applicant will explore opportunities to support local initiatives through community sponsorships. To ensure that both the CBSP and community sponsorships deliver meaningful and lasting impact, the Applicant could: • Continue to consult with local communities to identify needs and priorities and tailor CBSP initiatives accordingly over the life of the Project. • Collaborate with other renewable energy developers and industry stakeholders to ensure coordination and complementarity of benefit programs across the region, reducing the risk of duplication and improving effectiveness.	
Resource use and waste generation		
RR01	A Waste Management Plan (WMP) would be developed in consultation with Council to minimise waste, including: • Identification of opportunities to avoid, reuse and recycle, in accordance with the waste hierarchy. • Quantification and classification of all waste streams. • Confirmation and evidence of waste management agreements with waste facilities prior to the disposal of any waste product. • Defining appropriate lines of communication for each waste stream so any restrictions can be identified. • Provision for recycling management on-site. • Provision of toilet facilities for on-site workers and identify that sullage would be disposed of (i.e., pump out to local sewage treatment plant). • Tracking of all waste leaving the site. • Disposal of waste at licenced facilities permitted to accept the waste.	Construction and operation

Submissions Report

South Coree Battery Energy Storage System

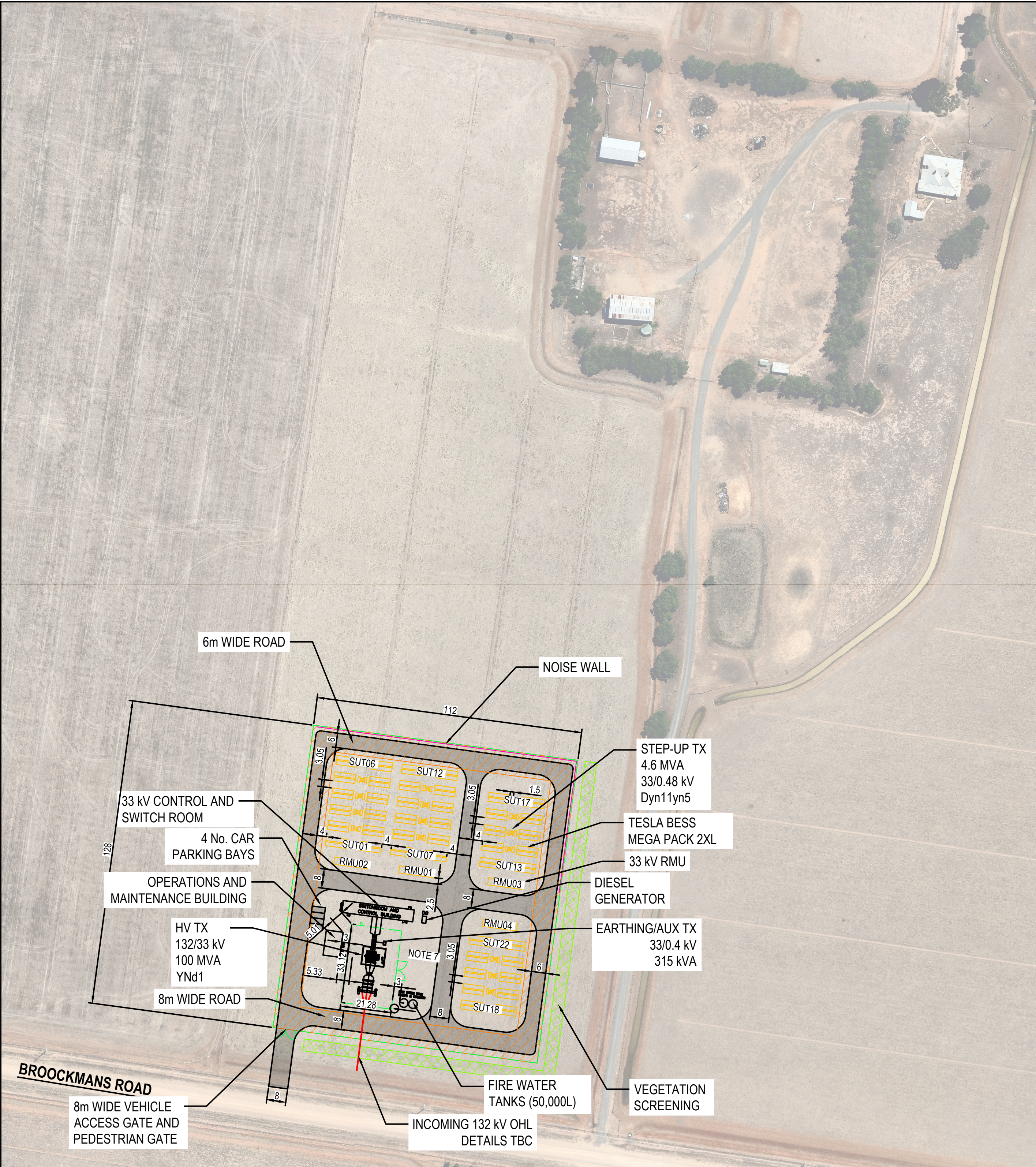
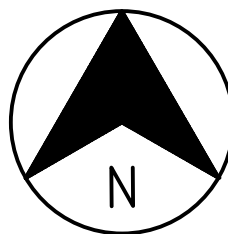
Mitigation number	Mitigation measure	Project Stage
	Requirements for hauling waste (such as covered loads).	
RR02	A septic waste management system would be installed and operated according to the Berrigan Shire Council regulations.	Construction Operation
RR03	Where possible, waste would be removed on a daily basis, or as soon as reasonably practical, to maintain the Development Footprint being litter free.	Construction
RR04	LFP Batteries would be kept, stored, managed and transported according to manufacturer's instructions and the ADG Code. Any spent batteries would be recycled at a B-Cycle accredited, EPA permitted and licensed recycler of LFP batteries.	Construction Operation Decommissioning
RR05	Develop a Decommissioning Waste Management Plan, when the project is planned for decommissioning.	Decommissioning
Air quality and climate		
A1	Management protocols in the EMS will include measures to minimise impacts on air quality including: - Identification of high-risk construction activities with potential to generate dust, and control measures for the activities and periods where dust generating works should not take place (eg during high winds) - A process for monitoring dust on-site and weather conditions, as well as procedures for altering management measures where required - A map identifying locations of nearby receivers - Notification of relevant stakeholders to hours of work and duration of work - An accessible complaints process with a timely response protocol.	All stages
A2	Dust generation by vehicles accessing the site and earthworks at the site will be suppressed using water applications or other means as required, using visual cues. - Covering dirt, sand, soil, or any loose material while in transport - Clean-up of any material spillage on the roads - Limiting construction vehicle speeds on unsealed roads - Checking of weather conditions (such as wind strength and	Construction Decommissioning

Submissions Report

South Coree Battery Energy Storage System

Mitigation number	Mitigation measure	Project Stage
	direction) prior to major potential dust emitting activities	
A3	Stockpiles will be covered or stored in areas not subject to high wind, and vehicle loads of material which may create dust would be covered while using the public road system.	Construction Decommissioning
A4	All vehicles and machinery used at the site will be in good condition, fitted with appropriate emission controls and comply with the requirements of the POEO Act, relevant Australian standards and manufacturer's operating recommendations. Plant will be operated efficiently and turned off when not in use.	All stages
A5	Fires and material burning is prohibited on site.	All stages

Appendix C Updated layout plans



PLAN
SCALE 1:1000

PROJECT INFORMATION

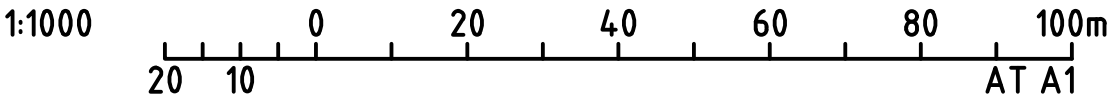
- CLIENT: SAMSUNG C&T
- LOCATION: SOUTH COREE, NSW
- ESTIMATED STORAGE CAPACITY: 80 MW / 320 MWh
- BESS: 88 x 979 kW TESLA MEGAPACK 2XL

LEGEND:

- 132 kV AC LINE
- ASSET PROTECTION ZONE
- BESS YARD FENCE
- NOISE WALL
- VEGETATION SCREENING

NOTES:

- THIS LAYOUT IS A PRELIMINARY CONCEPT LAYOUT TO DETERMINE FOOTPRINT. THE LAYOUT SHALL BE DEVELOPED FURTHER IN DETAILED DESIGN.
- ACCESS INTO THE STATION AND ACCESS ROADS TO BE CONFIRMED.
- ALL DIMENSIONS IN METERS UNLESS SPECIFIED
- AMENITIES ROOM TO BE INCLUDED INSIDE SWITCHROOMS.
- BESS DIMENSIONS TO BE CONFIRMED BY TESLA.
- STORAGE CAPACITY AT POINT OF CONNECTION (POC) IS CALCULATED BY OTHERS.
- INDICATIVE LOCATION FOR CRANE PAD TO THE EAST OF THE TRANSFORMER TO ALLOW FOR CRANE SETUP FOR TRANSFORMER INSTALLATION / REMOVAL.



CONCEPT DESIGN

F	CONCEPT DESIGN - VEGETATION SCREENING, NOISE WALL, PARKING BAYS UPDATES	RB	JR	RM	DB	23/06/25
E	CONCEPT DESIGN - SHIFT LAYOUT NORTH 5m	RB	JR	RM	DB	06/05/25
D	CONCEPT DESIGN - LAYOUT MODIFICATIONS - SHIFTING AWAY FROM EE EASEMENT	RB	JR	RM	DB	24/04/25
H	CONCEPT DESIGN	MK	GM	RM	JD	04/02/26
G	CONCEPT DESIGN - SHIFT SWITCH YARD RMU01/02 SOUTH 3m AS BESS GAP 3.05m	MK	GM	RM	JD	29/01/26
REV	DESCRIPTION	DESIGNED	DRAWN	REVIEWED	APPROVED	DATE



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CLIENT SAMSUNG C&T FINLEY, NSW			
DRAFTER G.MIN	DESIGNER M.KENYI	REVIEWER R.MEYER	APPROVER J.DARKER

TITLE SOUTH COREE 80 MW BESS SITE LAYOUT CONCEPT DESIGN			
PROJECT DATUM -	Original Size A1	MIDDLETON GROUP DRAWING NUMBER	
SCALE 1:1000	E	24211-E-DRG-001	H
	CODE	DRAWING NUMBER	REV

Appendix D Specialist studies

D.1 Accommodation and employment inventory

D.2 Preliminary Hazards Assessment

D.3 Biodiversity Development Assessment Report

D.4 Flood Impact Assessment

D.5 Traffic Impact Assessment

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