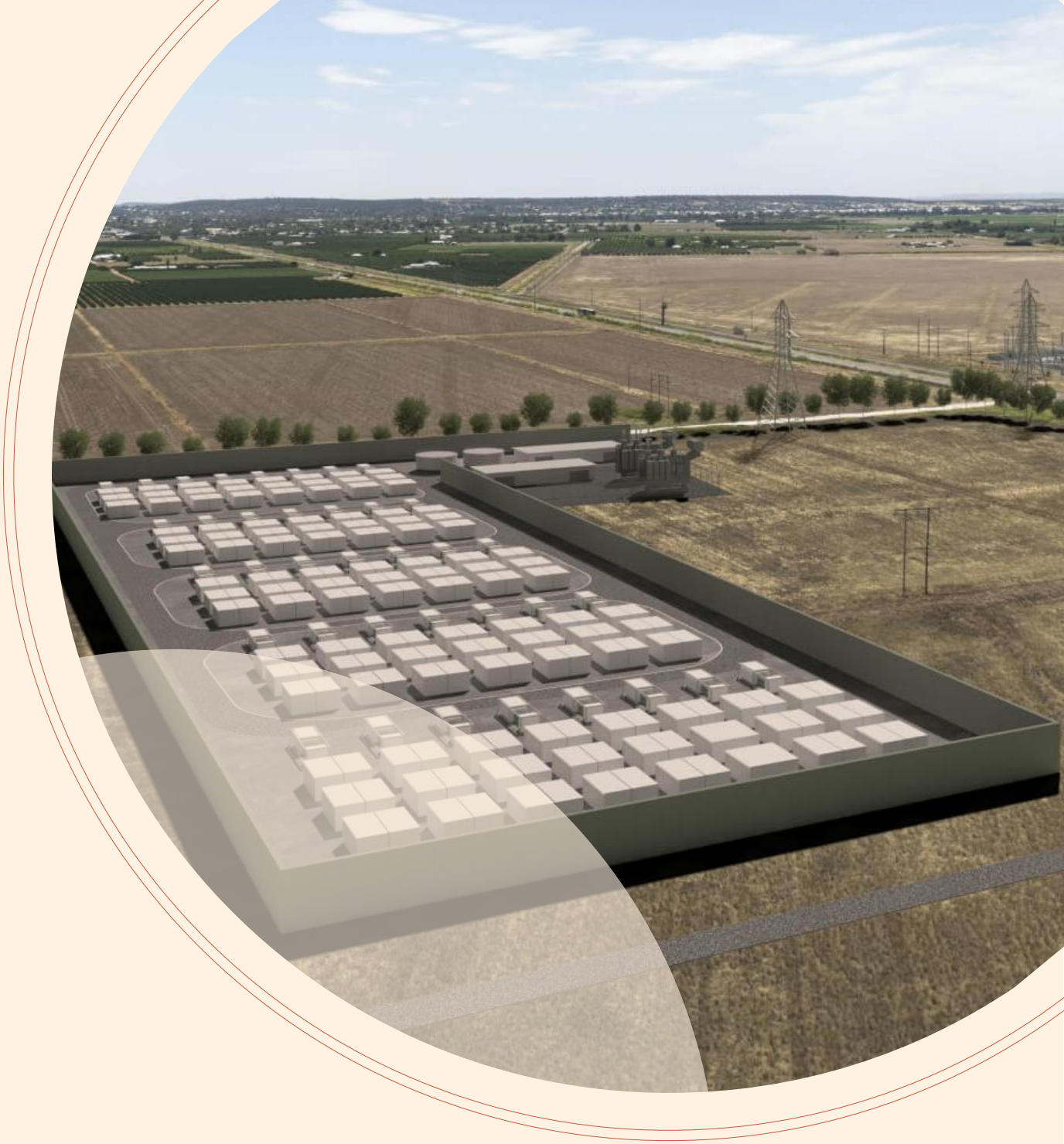

Environmental Impact Statement

Griffith Battery Energy Storage System

15 Bob Irbin Road, Yoogali NSW 2680

For Eku Energy on behalf of Griffith BESS Project Co Pty Ltd

13 November 2025

cogency

Planning | Engagement | Strategy

Document Details

Griffith Battery Energy Storage System

Project No:	2449
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Cogency Australia Pty Ltd

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Document history

Revision	Date	Description	Author	Approved
1	13/11/2025	Lodgement to DPHI	OS, RA, GC, KD	RW

We celebrate the physical and spiritual connections between Indigenous people and place expressed through the Birrarung Wilam (Common Ground) art project on the banks of Melbourne's Yarra River.

Acknowledgement of Country

Cogency acknowledges the Traditional Owners and Custodians of the land on which we meet, work and write, the Wurundjeri Woi-wurrung peoples of the Kulin nation, and their connections to land, sea, and community. We pay our respect to their Elders past and present and emerging.

Cogency also extends that respect and acknowledges the Traditional Custodians of Griffith & Yoogali, the Wiradjuri people. We recognise and respect their cultural heritage, beliefs and continuing connection with the land and waterways. We also recognise the resilience, strength, and pride of the Wiradjuri and First Nations communities and acknowledge that Sovereignty was never ceded.

EIS Declaration

Application Summary	
Project Name	Griffith Battery Energy Storage System
Application number	SSD-85372970
Address of land in respect of which the development application is made	15 Bob Irvin Road, Yoogali, NSW, 2680
Applicant details	
Applicant name	Griffith BESS Project Co Pty Ltd as trustee for the Griffith BESS Project Trust (referred to as Eku Energy)
Applicant address	360 Collins St, Suite 1, Level 34, Melbourne, VIC 3000, Australia
Details of person by whom this EIS was prepared	
Name	Rebecca Wardle
Address	Level 6, 84 William Street, Melbourne, VIC, 3000
Professional qualifications	B. Urb Plan & Dev (Melb), M. Environment (Melb) PIA, VPELA
Declaration by registered environmental assessment practitioner	
Name	Debrah Barr
Registration number	7085
Organisation registered with	Planning Institute of Australia
Declaration	The undersigned declares that this EIS: ▪ has been prepared in accordance with the Environmental Planning and Assessment Regulation 2021; ▪ contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; ▪ does not contain information that is false or misleading; ▪ addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; ▪ identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; ▪ has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement; ▪ contains a simple and easy to understand summary of the project as a whole, ▪ having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; ▪ contains a consolidated description of the project in a single Section of the EIS; ▪ contains an accurate summary of the findings of any community engagement; and ▪ contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
Signature	
Date	13/11/2025

Table of Contents

Table of Figures

List of Tables

Glossary

Abbreviation	Meaning
ABS	Australian Bureau of Statistics
ACHAR	Aboriginal Cultural Heritage Assessment Report
AEMO	Australian Energy Market Operator
AHIMS	Aboriginal Heritage Information Management System
BAM	Biodiversity Assessment Method
BDAR	Biodiversity Development Assessment Report
BESS	Battery Energy Storage System
BSAL	Biophysical Strategic Agricultural Land
CEC	Clean Energy Council
CEMP	Construction Environmental Management Plan
CIA	Cumulative Impact Assessment
CIV	Capital Investment Value
CSEP	Community and Stakeholder Engagement Plan
CTMP	Construction Traffic Management Plan
dB(A)	A-weighted noise or sound power level in decibels
DPHI	NSW Department of Planning, Housing and Infrastructure [current]
DPIE	NSW Department of Planning, Industry and Environment [former]
EPA	Environmental Protection Authority
EPBC	Environment Protection and Biodiversity Conservation
EP&A Act	NSW Environmental Planning and Assessment Act 1979
IAP2	International Association for Public Participation
ISP	Integrated System Plan
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan
LGA	Local Government Area
LVIA	Landscape and Visual Impact Assessment
kV	kilovolt
MER	Monitoring, Evaluation and Reporting
MNES	Matters of National Environmental Significance
MW	Megawatt
NEM	National Energy Market
OEMP	Operational Environmental Management Plan
OSOM	Over Size Over Mass
O&M	Operations and Management
PHA	Preliminary Hazard Analysis
RAP	Registered Aboriginal Party
REZ	Renewable Energy Zone
SEARs	Secretary's Environmental Assessment Requirements
SIA	Social Impact Assessment
SOHI	Statement of Heritage Impact
Strategy	Community and Stakeholder Engagement Strategy

TfNSW	Transport for NSW

Key Project Terms

Term	Definition
Ancillary infrastructure	All infrastructure necessary for the construction and operation of the BESS, including but not limited to internal roads, hardstands, substation, transmission connection, operation and maintenance facilities, temporary construction laydown, fencing and lighting.
Associated dwelling	Dwellings located on land within the Project area or dwellings where there is an agreement between the landowner and Proponent in place.
Development Area	The total area that would be directly impacted by the Project in the construction, operation, and decommissioning phases.
Non-associated dwelling	A dwelling on privately-owned land not within the Project area or where the landowner has not entered into an agreement with the Proponent.
Project	Griffith BESS
Project Site	The total area of the property lots impacted by the Project
Proponent	Griffith BESS Project Co Pty Ltd as trustee for the Griffith BESS Project Trust (referred to as Eku Energy)

Summary

This Environmental Impact Statement (EIS) has been prepared by Cogency Australia (Cogency) on behalf of Eku Energy on behalf of Griffith BESS Co Pty Ltd (the Proponent) for the proposed Griffith Battery Energy Storage System (BESS) and associated infrastructure (the Project). The BESS will have a delivery and storage capacity of 100 MW / 1000 MWh and will connect to the National Electricity Market (NEM) via the existing Griffith Substation. When connected, the Project will store energy during periods of low demand and release it during peak demand, providing network stability and grid forming capabilities.

The Project is primarily located at 15 Bob Irvin Road, Yoogali NSW, approximately 7 km southeast of Griffith city, within Griffith City Local Government Area. The Project is located 40 km outside of the South West Renewable Energy Zone (REZ) in a northeast direction from border of the REZ at Darlington Point.

The Project is considered State Significant Development (SSD) under Section 2.6 (b) and Schedule 1(20) of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP) because the Project is for the purpose of electricity generating works with a capital investment value in excess of $30 million.

This EIS has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the Project (SSD-85372970) on June 23, 2025, to assess potential economic, environmental and social impacts associated with the construction, operation and decommissioning of the Project, and develop environmental management measures to minimise any impacts.

Project overview

The Project involves the construction, operation and decommissioning of a BESS with a nominal capacity of 100 MW / 1000 MWh. The Project includes a 132 kV transmission connection between the Project's onsite substation and the nearby Griffith Substation.

Key elements of the Project include:

- Assembly containers, containing lithium-ion batteries.
- Transformers and inverters to combine and step up voltage.
- A switching room to convert low voltage current to medium voltage current.
- Intersection and road upgrades as required.
- 132 kV transmission connection from the onsite switching station to the Griffith Substation via underground and overhead cables subject to further investigation.
- Augmentation of the Griffith Substation, subject to Transgrid direction, to provide the construction of a new switch bay and associated bench extension, subject to needs assessment and direction from Transgrid.
- Associated ancillary infrastructure including:
  - Electrical/power conversion systems
  - Switchgear
  - Control building
  - Cabling and collector units
  - Storage and maintenance area
  - Internal access tracks
  - On-site parking
  - Security fencing and lighting
  - Temporary construction laydown area

The Project will require up to 150 full time equivalent (FTE) staff per day during peak construction and up to 2.5 FTE staff during operation.

Project refinement

Alternatives have been considered during the course of impact assessment and project design, including alternative transmissions options for connection to Griffith Substation.

Not progressing with the Project is not considered a viable option because this would avoid construction and operation impacts, but fail to meet the energy storage needs, thereby missing out on the benefits of stabilising the grid with renewable energy.

Project need

The Project is necessary to provide flexible dispatchable electricity supply to firm up the variable output from renewable sources and provide storage of surplus generation to be discharged in times of higher demand. Specifically for the region, the reactive power capability of the Griffith BESS would help to address the under-voltage instances in Southern NSW, where a trip occurs of the Darlington Point to Wagga 330 kV line[1].

Strategically, the Project aligns with state and national goals aimed at increasing renewable energy usage and reducing carbon emissions, supporting the NSW Government's clean energy targets. The Project is expected to facilitate regional economic growth by creating jobs and stimulating local economies during its construction and operational phases. The Project would also enhance the network resilience in the Riverina Murray region which is a key area designated for energy investment as demonstrated by the nearby South West REZ. Moreover, by complementing existing and future renewable developments, the Project can contribute to the transition towards a more sustainable energy future.

Approval pathway

The Project is an SSD as defined under the State Environmental Planning Policy (Planning Systems) 2021. Under this pathway, the Development Application (DA) will be assessed by the Minister for Planning and Public Spaces unless there are 50 or more public objections to the application, the applicant has made a reportable political donations disclosure or the local council has objected to the application and has not withdrawn the objection following exhibition in which case the Independent Planning Commission becomes the consent authority.

The Project is currently in the 'prepare EIS' stage, following the receipt of the SEARs on June 23, 2025. Following the lodgement of the EIS, the DA will be publicly exhibited for at least 28 days to provide the community with the opportunity to make a submission on the application. The application will then progress through the remaining steps of the SSD process, illustrated in Figure 1.

Figure 1 – EIS Process

Engagement

Eku Energy commenced early engagement in Griffith with the local community and key stakeholders including, neighbouring property owners, Griffith City Council, local First Nations groups and relevant government agencies.

These activities have included:

- Community Drop-In Sessions (January, May, August 2025)
- Doorknocks to neighbouring dwellings within 2km of the BESS Area (May 2025)

[1] https://www.transgrid.com.au/tapr/

- Community Benefit Sharing Workshop with Griffith City Council and local organisations (May 2025)
- Meetings with the Griffith Local Aboriginal Land Council (LALC) (ongoing)
- Meetings with Griffith City Council staff and councillors (ongoing)
- Letters including project updates and invitations to engagement events to dwellings within 2km of the BESS Area (May, July, August 2025)
- Public 'Meet and Greets' with the Project team at a local café in Griffith (May, August 2025)
- Advertising of engagement activities in The Area News.

These activities have been accompanied by the development of a Community Benefit Sharing Plan in consultation with the Griffith City Council. As part of this plan, Eku has committed to deliver Benefit Sharing funding to the Council and directly to the local community and First Nations stakeholders to promote local employment, supply chains and workforce development as part of the project's obligations under the Long-Term Energy Service Agreement (LTESA) awarded through the NSW Electricity Infrastructure Roadmap.

Assessment and mitigation of impacts

Section 6 of the EIS provides an assessment of the potential environmental, social and economic outcomes of the Project in accordance with the SEARs and identifies mitigation measures. Subject to the implementation of the mitigation measures, the potential environmental impacts of the Project will be acceptable and manageable. The key matters considered are briefly discussed in Table 1.

Table 1 – Summary of key impacts

Matter	Impact
Biodiversity	The Project is not expected to have a significant impact on biodiversity values due to the highly modified nature of the Development Area, no proposed native vegetation removal, and no creeks or waterbodies in the surrounding area.
Aboriginal cultural heritage	No Aboriginal heritage sites or places were identified during the survey therefore the Project is predicted to have a low or very low potential to impact Aboriginal cultural heritage.
Historic heritage	No historic heritage objects or places were identified during the survey therefore the Project is predicted to have no potential to impact historic heritage.
Land	During the construction phase, potential impacts on the Project Site land and agricultural use include the production of construction-related dust and the potential for impact on livestock through noise disturbance and vehicle movements. No loss of agricultural production or income is expected.
Landscape and visual amenity	The visual impact of the Project is very low to low primarily as a result of residences being surrounded by vegetation, as well as the occurrence of intervening vegetation in the landscape which screens or filters views of the Project components.
Noise	The predicted noise level at receivers is below the most stringent project noise trigger level of 35 dB LAeq, 15 min, by a minimum margin of 1 dB.
Transport	An increase in traffic movements is expected to take place during the construction period due to deliveries and construction workers. In the peak of the construction period, 110 to 170 light and 30 to 100 heavy vehicle movements are expected at the Project Site daily.
Water	The Project will generate an additional 13.6 ML/year of runoff, which can be managed via the proposed on-site detention basin and ensure the water balance is maintained. Effective erosion and sediment control will be required to prevent environmental degradation during and after construction.
Hazards	The lithium-ion batteries are a Class 9 Dangerous Good which introduces the risk of battery fire and ignition. The Project introduces Electric and Magnetic Fields (EMFs) within the accepted levels.
Contamination and soil	Areas of the Project Site with higher salinity may pose threat of concrete degradation for infrastructure that is placed within this soil.

Matter	Impact
	Deeper structures and installations required for the Project creates the risk of dispersion, poor infiltration, and erosion.
Social and economic	The Project creates a number of positive and negative impacts to the community including, a temporarily increase the local population, likely affecting housing, services, and local roads and traffic, and offers opportunities for local employment, skill development, and procurement.
Waste	The Project will generate waste during construction, operation and decommissioning.
Cumulative impacts	Cumulative impacts will likely be generated due to the proximity and construction timing of the Yoogali Solar Farm, Riverina Solar Farm and Hawkins Road Solar Farm.

1. Introduction

This section provides a description of the development including Project overview, objectives and background and information on the Proponent. The section also covers related developments, easements and restrictions and a summary of the structure of this Environmental Impact Statement (EIS).

This section seeks to address the following SEARs EIS requirements in some or full capacity:

- *a full description of the development, including:*
  - *a description of the physical elements of the development including the form, maximum height and materials (including ancillary infrastructure);*
  - *a high quality site plan at an adequate scale showing all infrastructure and facilities (including any infrastructure, and accommodation camps, that would be required for the development, but the subject of a separate approvals process);*
- *consistency in information presented in the EIS and all technical reports, including distances, development footprint, project design and infrastructure proposed, construction timeframes and receiver numbers;*
- *a strategic justification of the development focusing on site selection and the suitability of the proposed site with respect to potential land use conflicts with existing and future surrounding land uses (including existing land use, other proposed or approved energy facilities, major projects, rural/residential development, Crown lands within and adjacent to the project site and subdivision potential);*
- *an assessment of the likely impacts of the development on the environment, and any other significant issues identified in the above risk assessment, focusing on the specific issues identified below, including:*
  - *a description of the measures that would be implemented to avoid, mitigate and/or offset the impacts of the development*

1.1 Project overview

Cogency Australia Pty Ltd (Cogency) has prepared this Environmental Impact Statement (EIS) on behalf of Eku Energy (the Proponent), to accompany an application for a State Significant Development (SSD) for the Griffith Battery Energy Storage System (Griffith BESS) (the Project). The Project involves the construction, operation and decommissioning of a BESS with a nominal capacity to supply up to 100 MW to the National Electricity Market (NEM) for up to 10 hours (1000 MWh). It will be developed with a direct connection to the existing Transgrid managed 132 kV Griffith Substation.

The Project is located at 15 Bob Irvin Road, Yoogali on approximately 6 hectares of land. It is approximately 7 km southeast from the Griffith town centre, 3 km southeast of the Yoogali suburban centre, and 500 m south of the Griffith Substation, within the Griffith City Local Government Area (LGA) (Figure 2).

The Project objective is to provide additional storage for the electricity grid, strengthen the region's energy stability, lower wholesale electricity costs, and support the transition to net-zero. Siting adjacent to existing and proposed solar infrastructure, the project aims to support other energy infrastructure and the grid of the broader region while minimising the amenity impact on the community.

The purpose of this report is to provide the Department of Planning, Housing and Infrastructure (DPHI) with information on the economic, environmental, and social impacts of the Project, to assist with an informed assessment on the validity and approval of the Project, and ultimately for the consent authority to make a determination. This report has been prepared with consideration to the requirements of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the State environmental planning policies (SEPPs), the Griffith Local Environmental Plan (LEP), and other Local, State and Federal Government policies and guidelines. This report has been guided by the *State Significant Development Guidelines - Preparing an EIS* (2022).

A range of technical assessments have been undertaken to inform the final design of the Griffith BESS, support the preparation of this EIS, and provide a basis for the merits of the Project. They include:

- Noise and Vibration Assessment
- Social and Economic Impact Assessment

- Transport Impact Assessment
- Waste Management Plan
- Hydrology Assessment
- Landscape and Visual Impact Assessment
- Agricultural Impact Assessment
- Preliminary Site Investigation and Soil Survey
- Preliminary Hazard Analysis
- Bushfire Management Plan
- Aboriginal Cultural Heritage Assessment Report

Additionally, a Biodiversity Development Assessment Report (BDAR) Waiver has been granted in relation to the Project, and an Estimated Development Cost report has been prepared in accordance with Planning Circular PS 24-002.

The findings gathered from the preliminary assessments at the Scoping phase have helped inform the final Development Area layout and the preparation of this EIS. Following the receipt of SEARs, further relevant technical assessments have been carried out by an appointed team of expert consultants. Community and stakeholder engagement has continued in accordance with the Community and Stakeholder Engagement Plan. All of these inputs have informed the final Project justification presented in Section 7 of this EIS, which addresses the identified impacts of the Project, whilst also providing detail as to how these will be appropriately mitigated if the Project is approved to be constructed, operated and decommissioned.

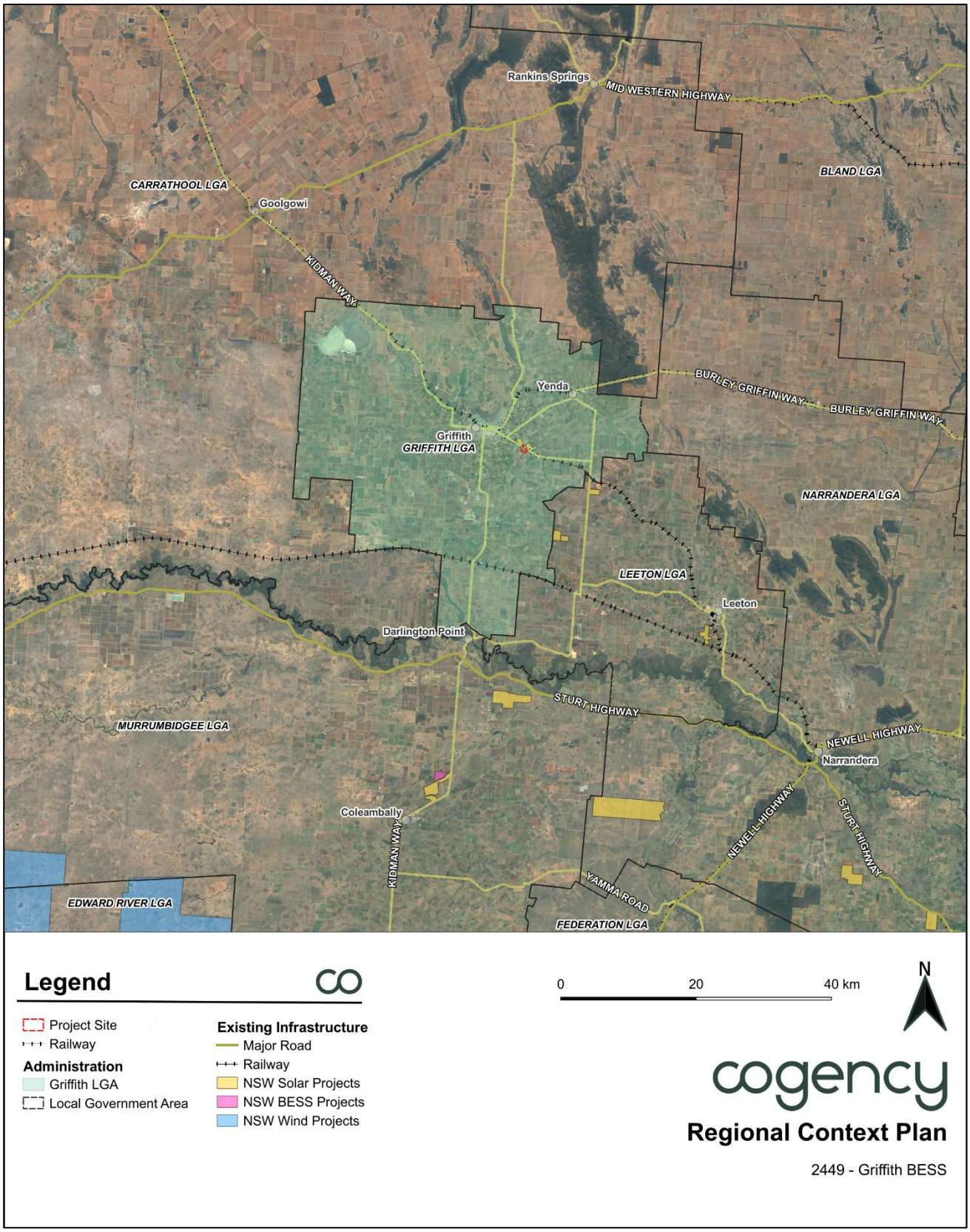


Figure 2 – Regional Context Plan

1.2 Project objectives

The objective of the Project is to store variable renewable energy when supply exceeds demand in the NEM. The stored energy can be dispatched when there is a higher demand as well as provide network stability and grid forming capabilities. The Project would enhance the grid function and operate like a 'virtual synchronous generator', which offers flexibility and maintain system strength in the NEM as coal fired power plants are progressively phased out.

Specifically, the Project seeks to:

- Facilitate NSW's shift towards renewable energy in accordance with the NSW Electricity Infrastructure Roadmap and the NSW Electricity Strategy.
- Support the energy storage and firming requirements of the national electricity market in accordance with the Australian Energy Market Operator (AEMO) 2022 Integrated System Plan for the NEM.
- Enhance the stability and resilience of the electricity network by providing energy storage, thereby ensuring consistent back-up power supply during electricity outages.
- Provide for a development that is suitable to the rural context and has no significant or unmanageable adverse environmental impacts.
- Support the locality through social and economic enhancement through the Project's construction and operational life.

1.3 Project background

As major coal power stations continue to retire and government decarbonization policies accelerate, the percentage of renewably generated electricity has increased in the NEM. The Australian Energy Market Operator (AEMO) forecasts the NEM will need to almost triple its generation capacity in response to increased electricity demand as a result of households and businesses switching from fuel and gas to renewable energy[2].

The Project intends to provide critical storage and firming services for the local and regional electrical grids as a greater share of variable renewable energy is continually developed across the Riverina Murray region. Storage and firming technologies will help maintain grid stability and inertia to balance the peaks and troughs of the increasing amounts of renewable generation across the state.

Project history

The Project has origins in utilising excess land made available by the Yoogali Solar Farm, a separate project being developed by EDP Renewables (EDPR) on land at 41 Bob Irvin Road, formerly including parts of 15 Bob Irvin Road. The Yoogali Solar Farm was approved by the Western Regional Planning Panel on behalf of Griffith City Council in 2019 under DA 291/2018 and is currently in a pre-construction phase. It will generate up to 15 MW of electricity and connect into the NEM via existing transmission infrastructure.

The Project will be located on the balance of land which is surplus to the needs of the Yoogali Solar Farm. In this way, it will make effective and efficient use of land already approved for electricity generation and directly accessible to supporting infrastructure. Griffith BESS and Yoogali Solar Farm will operate independently with separate connections into the NEM, however both proponents are working closely together during this design development and impact assessment phase to ensure a coordinated outcome is achieved.

In order to help facilitate the independent delivery of each project, DA 291/2018 has been modified to provide better physical and legal accommodation of the Project by way of rearrangement of panels to provide a simplified balance of land for the Project, and re-subdivision of lots between 15 and 41 Bob Irvin Road to allow each development to be carried out on separate parcels.

[2] https://aemo.com.au/-/media/files/major-publications/isp/2024/2024-integrated-system-plan-isp.pdf?la=en

The Project has been successfully awarded a Long Duration Storage Long Term Energy Storage Agreement (LDS LTESA) by AEMO Services which was announced on the 27th of February 2025[3]. As LDS, the Project must provide at least 8 hours of dispatch in accordance with the *Electricity Infrastructure Investment Act 2020* (EII Act). Such a contract being awarded to Griffith BESS is a recognition of the contribution that the Project will make towards system reliability, security and local communities, benefiting all NSW energy consumers over the long term. As established by the Minister for Energy under the EII Act, NSW will require at least 28 GWh of long duration energy storage by 2034. It also reinforces the Proponent's commitment to community engagement and benefit sharing which will include community benefit funding, investment into local manufacturing, investment into local training and development, local and First Nations procurement, and targeted local employment opportunities. See Section 5 for further discussion of these commitments and engagement carried out to date and planned.

1.3.1 Key impact avoidance, minimisation and offset strategies

Since the early conception of the Project, there are key strengths in the design and siting that have allowed for impacts to be managed and mitigated. Those are:

- Use of a land parcel with existing approval for electricity generation infrastructure (DA 291/2018) (Section 2, 3).
- Siting on a land parcel with little to no native vegetation or habitat value (Section 2, 6, 7).
- Early and frequent engagement with key stakeholders, neighbours and the broader community to allow for the final design to include valuable local knowledge (Section 5).
- Choice of site with a small number of potential sensitive receptors in proximity to the site (Section 2, 5, 6).
- Make efficient use of land in proximity to existing electrical infrastructure, including nearby solar farms and the Griffith Substation (Section 2, 3).

1.3.2 Changes since Scoping Report

Since the submission of the Scoping Report, there have been minimal changes to the Project and the associated Concept Layout. The minor changes relate to the alignment of the transmission corridor, to account for the multiple options being explored in coordination with Transgrid. No substantive changes have been made to the BESS layout.

As the Project moves forward through the EIS process, it is anticipated that there may be changes to the Concept Layout through the continued detailed design process, or as a result of engagement including with the public, agency advice and Griffith City Council.

This EIS and the associated technical assessments have been prepared based on a 'worst case' scenario, meaning that any changes to the Concept Layout are not expected to warrant revision of the EIS or technical assessments.

1.4 Related development

There are no existing or approved developments that would need to be incorporated into the assessment of the Project. The Project's development application includes all development required to construct and operate the Project and no separate assessment processes are proposed.

However, it is relevant to note that land adjoining the Project and within the same land ownership will be used for the Yoogali Solar Farm. Although a separate and approved development, there is a close working relationship between both proponents. Any overlapping construction period will be managed in a coordinated method by both parties to minimise impact to surrounding areas.

[3] https://aemoservices.com.au/news/media-release/250227-asl-nsw-long-duration-storage-tender-awards-more-than-1gw-and-13gwh

1.5 Easements and Restrictions

The following restrictions and covenants apply to the Project Site:

- **Easement for Transmission Line**
  - There is a 30.175 m wide transmission easement containing the 132 kV Yanco to Griffith transmission line. It crosses the site from the northwest corner to the southeast, facilitating a connection to the nearby Griffith Substation.
- **Easement for Pipeline**
  - There is a 20 m wide transmission easement along the northern boundary of the land parcel which facilitates a gas line along Irrigation Way.
- **Easement for Water Supply**
  - There is a 3 m wide easement for a water supply connection from the northwest corner, and along the western boundary of the land parcel to where there was a previous dwelling on the site at 15 Bob Irvin Road.

1.6 Proponent

Eku Energy (the Proponent) is a global energy storage development specialist who develop, build and operate battery energy storage systems with a key focus in Australia, Japan and the United Kingdom. Owned by two global financial powerhouses, a Macquarie Asset Management (MAM) managed fund and British Columbia Investment (BCI) Management Corporation, Eku Energy was established to meet the growing need for utility-scale battery storage worldwide, and exclusively focus on BESS technologies and their applications.

Their mission centres around developing and managing advanced energy storage systems that enhance grid stability, integrate renewable resources, and provide reliable, clean energy to communities. With a commitment to excellence and sustainability, the Proponent leverages cutting-edge technology and industry expertise to deliver projects that not only meet but exceed environmental and performance standards.

The Proponent currently has three other projects in Australia, including the operational Hazelwood BESS in Gippsland, and the operational Rangebank BESS in Cranbourne, Victoria, the approved Tramway Road BESS in Victoria, and the under-construction Williamsdale BESS in the Australian Capital Territory.

Key details of the Proponent are provided in Table 2.

Table 2 – Proponent details

Requirement	Details
Full name/s	Griffith BESS Project Co Pty Ltd as trustee for the Griffith BESS Project Trust (referred to as Eku Energy)
Address	360 Collins St, Suite 1, Level 34, Melbourne, VIC 3000, Australia
ABN	99 662 797 382

1.7 EIS structure and purpose

This EIS has be prepared in accordance with the SEARs, issued on 23 June 2025, and the relevant requirements of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation). Appendix A provides the SEARs and where they have been addressed.

Additionally, this EIS has been prepared in consideration of *Cumulative Impact Assessment Guidelines for State Significant Projects 2022, Undertaking Engagement Guidelines for State Significant Projects (DPE, 2022f), and the Social Impact Assessment Guideline for State Significant Projects (DPE, 2023).*

Table 3 outlines the overall structure of this EIS, prepared in accordance with the DPIE *State Significant Development Guidelines – Preparing an Environmental Impact Statement 2022* and Appendix C outlines how the form and content of this EIS complies with EP&A Regulation.

Table 3 – EIS structure

Requirement	Description	Section / Appendix
Introduction	Introduction of the Project, Proponent and provides an outline of the structure of the EIS.	Section 1
Strategic context	An outline of the strategic context for the Project, including the justification for the Project, a summary of the locality in which the Project is undertaken and an overview of the environmental, social and economic context.	Section 2
Project description	Detailed description of the Project including ancillary infrastructure, construction and operation phases and mitigation measures.	Section 3
Statutory context	Summary of the relevant State and Commonwealth statutory context applicable to the approval process for the Project.	Section 4
Engagement	Summary of consultation undertaken with the community and relevant stakeholders and key issues identified during the process.	Section 5
Assessment of impacts	Analysis of the environmental, social and economic matters relevant to the Project and the specialist assessments which have been undertaken for this EIS.	Section 6
Project justification	Justification and evaluation of the Project in regard to economic, environmental and social matters and the principles of ecologically sustainable development.	Section 7
References	List of references within this EIS.	Section 8
SEARs table	Summary of the SEARs and where they have been addressed.	Appendix A
Statutory compliance table	Summary of all statutory requirements relevant to the assessment of the Project.	Appendix C
Community engagement table	Summary of key issues raised and where they have been addressed.	Appendix D
Mitigation measures table	Summary of all mitigation and management measures proposed to be implemented for the Project.	Appendix E

Additionally, the technical studies supporting this EIS are included in the appendices, refer to Table 4, and the key outcomes are summarised in Section 6.

Table 4 – Technical assessments

Technical Study	Technical Specialist	Appendix
Biodiversity Development Assessment Report (BDAR) Waiver	Niche Ecology and Heritage	Appendix F
Aboriginal Cultural Heritage Assessment Report (ACHAR)	Red-Gum Environmental	Appendix G
Landscape and Visual Impact Assessment (LVIA)	Peter Haack Consulting	Appendix H
Noise and Vibration Assessment	Marshall Day Acoustics	Appendix I
Social and Economic Impact Assessment	Lecroma	Appendix J
Transport Impact Assessment	Onemilegrid	Appendix K
Waste Management Plan	Onemilegrid	Appendix L
Hydrology Assessment	HARC	Appendix M
Agricultural Impact Assessment	Tremain Ivery Advisory	Appendix N
Preliminary Site Investigation and Soil Assessment	ARC Environmental	Appendix O
Preliminary Hazard Analysis (PHA)	Riskcon Engineering	Appendix P
Bushfire Assessment Report	Cool Burn	Appendix Q
Estimated Development Cost (ECD) Report	Mitchell Brandtman	Appendix R

2. Strategic context

This section outlines the context and justification for the Project regarding renewable energy policy, environmental and social context, cumulative impacts, and alternatives.

This section seeks to address the following SEARs EIS requirements in some or full capacity:

- *a full description of the development, including:*
  - *confirmation if the project is designated development in accordance with the Environmental Planning and Assessment Act 1979 (EP&A Act) and the EP&A Regulation*
- *a strategic justification of the development focusing on site selection and the suitability of the proposed site with respect to potential land use conflicts with existing and future surrounding land uses (including existing land use, other proposed or approved energy facilities, major projects, rural/residential development, Crown lands within and adjacent to the project site and subdivision potential)*
- *a risk assessment of the potential impacts of the development, identifying the key issues for further assessment;*
- *an assessment of the likely impacts of the development on the environment, and any other significant issues identified in the above risk assessment, focusing on the specific issues identified below, including:*
  - *a description of the existing environment likely to be affected by the development using sufficient baseline data;*
  - *an assessment of the likely impacts of all stages of the development (which is commensurate with the level of impact), including any cumulative impacts of the site and existing, approved or proposed developments in the region and impacts on the site and any road upgrades, taking into consideration any relevant legislation, environmental planning instruments, guidelines, policies, plans and industry codes of practice including the Cumulative Impact Assessment Guideline (DPE, 2022);*
- *a detailed evaluation of the merits of the project as a whole, having regard to:*
  - *feasible alternatives to the development and its key components, including siting and project design alternatives to avoid areas of biodiversity value and high archaeological sensitivity, opportunities for shared infrastructure with proposed developments in the region, and the consequences of not carrying out the development; a detailed consideration of the capability of the project to contribute to the security and reliability of the electricity system in the National Electricity Market, having regard to local system conditions and the Department's guidance on the matter.*

2.1 Renewable energy policy context

The Project aligns with key federal, state and local strategic planning and policy commitments, see Table **5**, to increase renewable energy generation and deliver affordable electricity across Australia.

Table 5 – Summary of strategy and policy alignment

Strategy, Policy, or Plan	Description	Project Alignment
National and International Context		
United Nations Framework Convention on Climate Change Conference of Parties (COP21) – The Paris Agreement	▪ The Paris Agreement, adopted at COP21 in December 2015, is an international treaty aiming to combat climate change. Its primary goal is to limit global warming to well below 2°C above pre-industrial levels, with efforts to keep it below 1.5°C. To achieve this, the Agreement requires countries to reduce their greenhouse gas emissions and transition to low-carbon, climate-resilient economies.	▪ By increasing the availability of renewable energy in the electricity grid and reducing greenhouse gas emissions, the Project will directly support the goals of the Paris Agreement. The Paris Agreement seeks to keep global temperature rise below 2°C above pre-industrial levels. The Project will contribute by storing clean, renewable energy.

Strategy, Policy, or Plan	Description	Project Alignment
	▪ Each country sets its targets, known as nationally determined contributions (NDCs), which are reviewed and updated every five years to reflect increasing ambition and progress. ▪ The Agreement also emphasises the importance of financial and technical support for developing countries to help them mitigate and adapt to climate change impacts.	▪ The Project aligns with Australia's NDCs under the Paris Agreement. These NDCs include targets for reducing emissions and increasing the use of renewable energy sources. By providing additional storage for renewable energy generation, the Project supports these targets and helps Australia meet its emissions reduction commitments.
Integrated System Plan 2024 (AEMO)	▪ AEMO's Integrated System Plan (ISP) is a roadmap for the transition of the NEM power system, with a clear plan for essential infrastructure that will meet future energy needs. The ISP's optimal development path sets out the needed generation, storage and network investments to transition to net zero by 2050 through current policy settings and deliver significant net market benefits for consumers.	▪ The Project would contribute to the energy storage targets as outlined in the ISP and provide grid support services and stability as new variable renewable energy sources enter the NEM.
Net Zero Plan	▪ The Net Zero Plan will guide the Australian Government in the transition to the legislated target of net zero greenhouse gas emissions by 2050. The Plan will determine a 2035 emissions reduction target which is due by the end of February 2025. The Plan will set out government priorities, establish policies and measures to drive down emissions and support ongoing and new investment in low emissions and renewable activities.	▪ The Project will support the transition towards net zero greenhouse gas emissions by 2050 and the 2035 emissions reduction target.
Commonwealth Renewable Energy Target Scheme (RET)	▪ The RET aims to encourage greater uptake of renewable energy generation nationally, at both a large and small scale. ▪ The Large-scale Renewable Energy Target (LRET) is targeting 33,000 GW/h of new renewable energy generation each year.	▪ The Project enables greater uptake of large-scale renewable energy installations across the electricity grid by freeing up capacity. By storing electricity generated in excess in off-peak periods, the Project will permit solar and wind installations to remain producing for more of the day.
State Context		
Climate Change (Net Zero Future) Act 2023	▪ The *Climate Change (Net Zero Future) Act 2023* legislates NSW's ambitious approach to addressing climate change, enshrining a whole-of-government climate action to deliver net zero by 2050.	▪ The Project will support the transition towards net zero greenhouse gas emissions by 2050 and the interim targets of 50% reduction on 2005 levels by 2030 and 70% reduction on 2005 levels by 2035.
NSW Electricity Strategy	▪ The NSW Electricity Strategy is the NSW Government's plan for a reliable, affordable and sustainable electricity future that supports a growing economy.	▪ The Project aligns with the *NSW Electricity Plan* by contributing to the replacement of ageing generation equipment (i.e. coal-fired power stations) by storing

Strategy, Policy, or Plan	Description	Project Alignment
	▪ The Strategy sets out three major goals. The first includes ensuring investment in generation technologies. The second guarantees an Energy Security Target if a level of capacity is not met by the market. The third is to ensure the NSW Government has the power to handle electricity emergencies. ▪ The Electricity Plan details the generation, transmission, distribution, and retail elements that combine to provide the State's electricity network. ▪ While the Plan states that the NSW Government has a neutral approach to electricity generation technology, it details that both NSW and Commonwealth laws prohibit the development of nuclear power stations. Furthermore, the Plan explains that the State's aging coal-fired power stations are reaching the end of their technical lives.	renewable energy for the electricity grid. ▪ The Project will help manage demand and maximise share of renewable energy in the NEM.
NSW Transmission Infrastructure Strategy	▪ The *NSW Transmission Infrastructure Strategy* is a comprehensive plan by the NSW Government aimed at transforming the state's energy infrastructure. This plan seeks to support the development of REZ's in the Central-West, New England, and South-West regions, projected to generate significant private investment, regional economic growth, and job opportunities.	▪ The Project aligns directly with the Strategy by storing excess energy during periods of high generation and disperse during periods of high demand which will help lower household electricity costs.
NSW Electricity Infrastructure Roadmap	▪ The NSW Electricity Infrastructure Roadmap is the State's comprehensive plan to transition to renewable energy. It aims to ensure reliable, affordable, and sustainable energy for the future. Key components include the development of REZ's, supporting new transmission infrastructure, encouraging investment in renewable generation and storage, and creating jobs.	▪ The Project will significantly contribute to the NSW Electricity Infrastructure Roadmap by enhancing the state's renewable energy capacity. ▪ The Project aligns with the Roadmap's goals of reducing greenhouse gas emissions and lowering electricity costs for consumers. The Project will create construction and ongoing jobs and stimulate economic growth in the region, further supporting the state's broader economic and environmental objectives outlined in the Roadmap.
Regional Context		
Riverina Murray Regional Plan 2041	▪ The *Riverina Murray Regional Plan 2041* is a land use plan for the Riverina Murray region, within which the Griffith BESS is situated. ▪ The *Plan* recognises the importance of agriculture for the region's economy as it acts as 'Australia's food bowl'.	▪ The Project will assist in the region's effort to contribute to the target through facilitating greater capacity for renewable energy in the region, whilst carefully considering the local impacts flagged on p.59 of the Plan. ▪ The strategic site selection of the BESS has minimised impact on

Strategy, Policy, or Plan	Description	Project Alignment
	▪ The vision for the region to 2041 is implemented through objectives, strategies and actions for the three parts of the plan: Environment, Communities and places, and Economy. ▪ Under Objective 13, 'Support the transition to net zero by 2050', the region has expressed a desire to play an active role in the NSW target for net zero emissions by 2050.	productive agricultural land and visual impact, working toward negligible conflict in relation to those outlined in the Plan.
Riverina & Murray Joint Organisation (RAMJO) Statement of Strategic Regional Priorities	▪ This *Statement* represents the high-level strategic priorities of 11 of the councils within the Riverina Murray region, including Griffith. ▪ The *Statement* outlines seven 'Priority Pillars' to achieve the desired diverse population growth over the medium term.	▪ One of the seven 'Priority Pillars' is to 'Improve Energy Security and Affordability'. The Project directly supports the outcomes identified within this pillar by increasing energy access for the region as well as improving 'regional energy security'.
Riverina & Murray Joint Organisation (RAMJO) Regional Energy Strategy	▪ This *Regional Energy Strategy* outlines the challenges being faced by the RAMJO in relation to energy infrastructure and consumption. It explains the challenges and opportunities that Councils are facing in relation to the energy transition and what should be done to improve financial and sustainability efficiencies. ▪ The RAMJO also specifies the opportunity presented by the growing prominence of 'more flexible and location based renewable energy generation and storage.'	▪ The Project supports RAMJO's Regional Energy Strategy by providing greater grid stability and energy security for regional communities. ▪ The Project's commitment to developing a benefit sharing scheme additionally supports RAMJO's desire to reap the benefits of the renewable energy transition across the region.
Western Riverina Regional Economic Development Strategy – 2023 Update	▪ This update to the *Economic Development Strategy (EDS)* provides a more recent strategy for the Western Riverina region, including how key industries are performing and which are emerging into relevance. It also highlights the progress made since the EDS was first developed in 2018. ▪ Renewable energy is mentioned with the EDS is as a key 'growing source of investment' across the region. Griffith Solar Farm, located opposite the Project Site, is identified as a 'significant contributor' to the industry and energy network of the Western Riverina.	▪ The Project will further expand the region's renewable energy industry which is identified in the Update as emerging and a key opportunity for growth in investment in the local economy. Through supporting local employers and manufacturers through the lifecycle of the Project, there will be a positive impact on the region's economy.

Strategy, Policy, or Plan	Description	Project Alignment
Local Context		
Griffth Community Strategic Plan 2025 – 2035	▪ The *Community Strategic Plan* seeks to provide a high-level vision for the Griffith LGA over the next 10 years. The goals and priorities established within the document serve to guide the actions of council officers and subsequent development of policies/objectives over the 10-year period. ▪ The document establishes four key themes for Griffith City LGA, Leadership, Liveable, Growing, and Sustainable. Each of these are assigned to various objectives and strategies.	▪ The Project is of relevance to the local community's response within the Plan regarding the Sustainability theme. By relieving grid pressure and allowing a greater level of renewable energy generation within the region, the Project promotes 'efficient use of natural resources'. ▪ The Project will also assist in alleviating an identified strategic risk to Griffith, that being climate change threats. The Project, and BESS projects more broadly are key enablers of a faster transition away from fossil fuel energy use and therefore can assist in mitigating future climate risks to the LGA.
Growing Griffith to 2045 – Griffith Local Strategic Planning Statement	▪ The *Griffith Local Strategic Planning Statement (LSPS)* provides a land use planning vision for the Griffith LGA for the next 25 years. It establishes key values for the land use of the area and these inspire four themes of planning related actions and priorities of the council. ▪ The Griffith Council has a strong focus on the revitalisation and improvement of the Griffith CBD, while also maintaining strong economic activity across the council area through residential expansion and improved built form.	▪ The Project assists in further supporting the expansion of solar energy which is identified in the LSPS as 'ideal' for the area. BESS installations increase the capacity of the energy grid which can assist in storing surplus energy generated by solar farms during off-peak periods.

2.2 Environmental and social context

2.2.1 Location and context

This section describes the geographical and community context of the Project. The Project Site is located at the intersection of Bob Irvin Road and Irrigation Way, in the suburb of Yoogali, within the Griffith City Council. Refer to Sections 2.2.1.1 and 2.2.1.2 for a description of the regional context and community context.

The Project is made up of a number of 'areas' which are defined as follows:

- Project Site – comprises one primary title (15 Bob Irvin Road) and five secondary titles for the access, transmission and substation land
- Development Area – total area that would be directly impacted by the Project in the construction, operation, and decommissioning phases
- Indicative BESS Area – a subset of the 'Development Area' which comprises land set aside for the construction and operation of the BESS
- Indicative Transmission Corridor – a subset of the 'Development Area' which comprises the transmission corridor, within which the transmission route options are proposed
- Outside Development Area – a subset of the 'Project Site' which comprises land that is not intended to be developed as part of the Project.

The Site Layout Plan, showing the abovementioned areas is shown in Figure 3. For further details on the abovementioned areas, refer to Sections 3.2 and 3.3.

Figure 3 – Site Plan

2.2.1.1 Regional Context

The Project is located within the Griffith City LGA and is a part of the Riverina Murray region of southern NSW. The Riverina Murray region, sitting entirely within the Murray Darling Basin, is well known for its productive agriculture and favourable geographic connections to Victoria, ACT and the rest of NSW.

Griffith City is one of 20 LGAs within the Riverina Murray region and is one of the three primary regional centres of the region. Yoogali is a 'village' of Griffith sitting southeast of the Griffith CBD by approximately 3 km. At the 2021 Census, there were 1,334 people living in Yoogali, compared to 19,505 living in Griffith.

Griffith, Yoogali and their surrounds are all within the Murrumbidgee Irrigation Area (MIA), which has allowed for continuous agricultural prosperity within the region across many decades. Notably, the Riverina wine region, which is centred on Griffith, is the largest viticulture region in NSW and the second largest in Australia.

Renewable energy is becoming a key industry of Griffith with multiple solar farms proposed, already operating or within the planning process at the time of writing. Yoogali is not within a Renewable Energy Zone (REZ), however is just 40 km northwest of the boundary of the NSW South West REZ.

Locating BESS facilities both within and outside of designated REZs is an important part of the broader energy development picture, because the primary purpose of supporting infrastructure such as grid-scale storage is to provide stability for existing and new electrical infrastructure, regardless of location. Furthermore, a large portion of existing storage development is currently located outside REZs and continued development outside of these areas will be required to support a full transition to renewable energy. In other words, future projects are permissible and should be anticipated to occur outside formally designated REZs.

Access to Griffith and Yoogali is facilitated through several NSW State Roads and Highways which include Burley Griffin Way to the east and Kidman Way to the south and west, as well as the Newell Highway and Sturt Highway further east and south.

The broader region that the Project sits within is illustrated in Figure 5. Notably, south toward Darlington Point, there are a number of larger scale renewable energy projects, closer or within the South West REZ. Griffith City as an LGA has a limited but growing number of renewable energy projects.

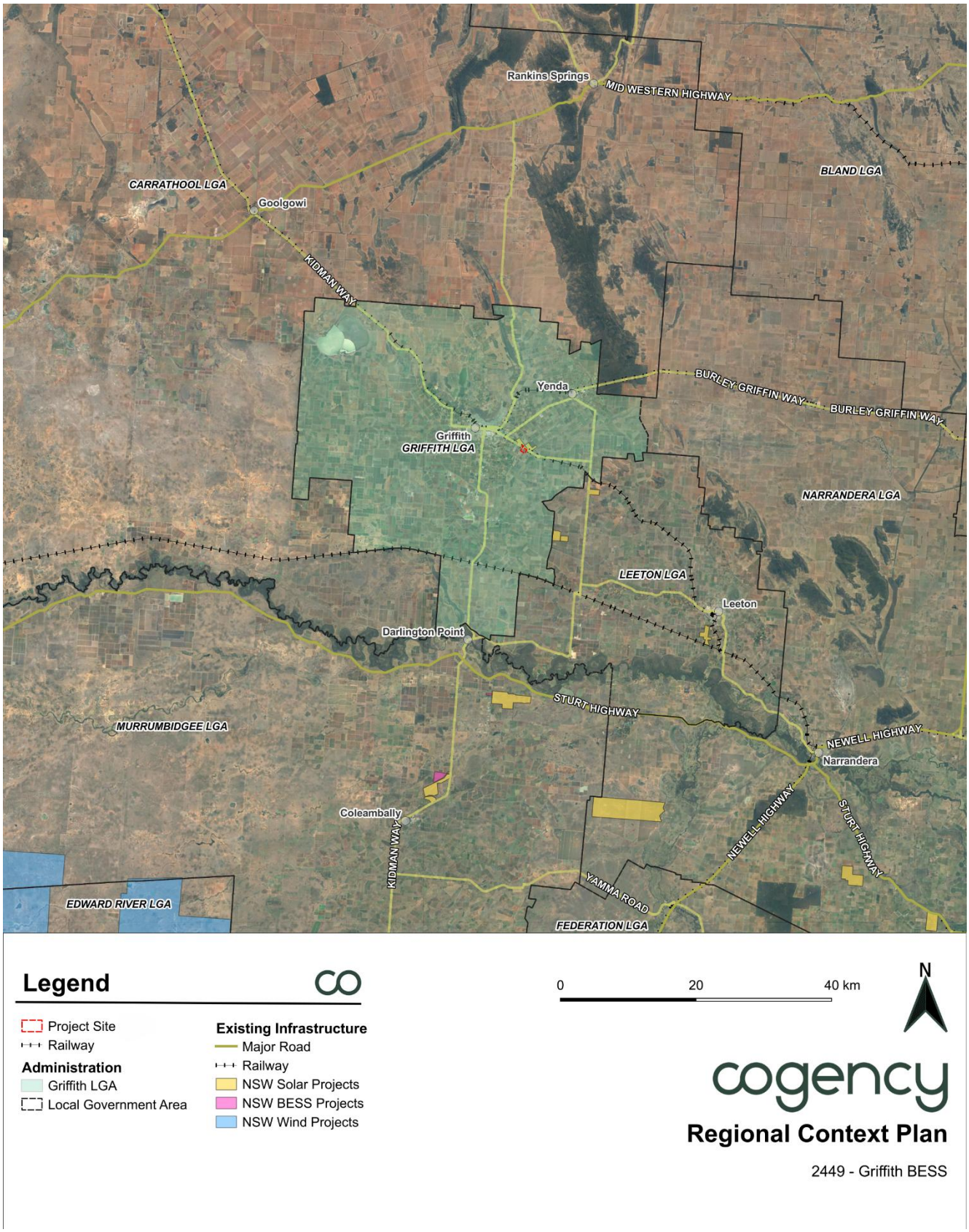


Figure 4 – Regional Context Plan

2.2.1.2 Community Context

The Project Site is located on Wiradjuri land, which is the largest nation of Aboriginal and Torres Strait Islander people in NSW and Australia. Known as the land of three rivers (Macquarie, Lachlan, Murrumbidgee), the Wiradjuri people have a strong connection to the waterways that border their lands.

Prior to white settlement of the area, it is estimated that 12,000 people spoke the Wiradjuri language. Across the Griffith LGA, 4.1% of the population is Indigenous and is represented in governance by the Griffith Local Aboriginal Land Council (LALC). The Murrumbidgee River has remained a focal point not only for the Wiradjuri people but also the wider settler community. A totem of the Wiradjuri, the goanna, is celebrated through the design of the Three Ways Cultural Park in Griffith.

Today, Yoogali and Griffith as a city is a highly multicultural area. The population of Griffith (19,505) and Yoogali (1,334) has grown by 7-8% in the period between the 2016 and 2021 Census, reflecting broader migration patterns from urban areas due to changing lifestyles following the COVID-19 pandemic. In Yoogali, the leading ancestry of residents is Italian (41%), which is similar in Griffith. Italian migration, which occurred primarily from 1880 – 1940, was key in establishing Griffith's regional economy as many immigrants chose to open businesses and instigate commercial farms. The Riverina wine region includes many wineries with Italian names and heritage. There is also an above average Indian population across the region, with the annual Griffith Shaheedi Tournament being held to celebrate the Sikh community in Griffith.

In Yoogali, the leading industry of work is wine and other alcoholic beverage manufacturing, followed by supermarket and poultry processing work. Notably, the median age of residents is above the national/state medians, with an additional higher proportion of families with children and significant Catholic religious affiliation. The local employment industries are on the labour-intensive side, with lower rates of university enrolment and high school completion. There are high rates of labour force participation (67.4%) in Yoogali, with weekly incomes above the state and national averages.

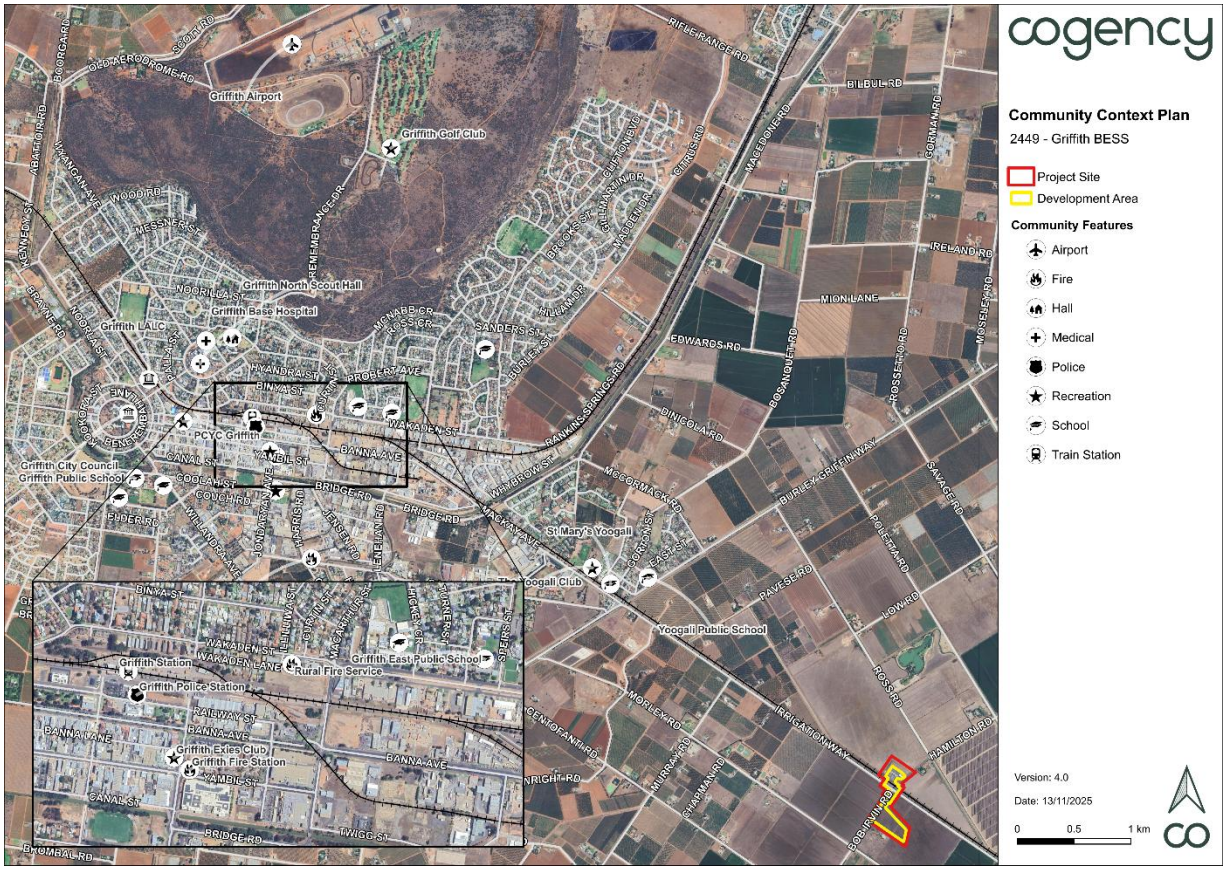


Figure 5 – Community Context Plan

2.2.2 Project Site and land use

The Project Site is surrounded by a mix of electricity infrastructure uses and agricultural land. Adjoining the land parcel on the eastern boundary is active farmland utilising the Irrigation Way irrigation channel. Across Morley Road and Bob Irvin Road to the west and south of the Project Site are agricultural and rural residential land uses. To the north, across Irrigation Way, is the Griffith Substation that the Project intends to interface with, as well as the 36 MW Griffith Solar Farm which has been operational since 2018.

Broadly, Yoogali is a combination of agricultural land, rural lifestyle residencies, and electricity infrastructure. There is little natural, native vegetation across the area due to the longstanding pastoral history of the area. On the approach to the Yoogali/Griffith town centres, heading northwest on Irrigation Way, the land parcels become denser and smaller. There are several smaller commercial farms that operate in Yoogali, servicing the Griffith area and beyond.

The Project Site and most of the surrounds are classed as a '3' within the *Land and Soil Capability* dataset by the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW). This is considered to have 'moderate limitations', requiring intervention in order to make the land agriculturally productive and without persevering issues[4]. This is mapped in Figure 7, with some land approximately 1.5 km west of the Project Site classed as 6 (very severely limited), comprising the Mirrool Creek and surrounding vegetation.

There are 48 dwellings identified within 2km of the Project Site (Figure 6), of which 3 of these are within 1km and 1 within 500m of the Project Site. These dwellings have been engaged with directly, which is outlined further in Section 5 of this report.

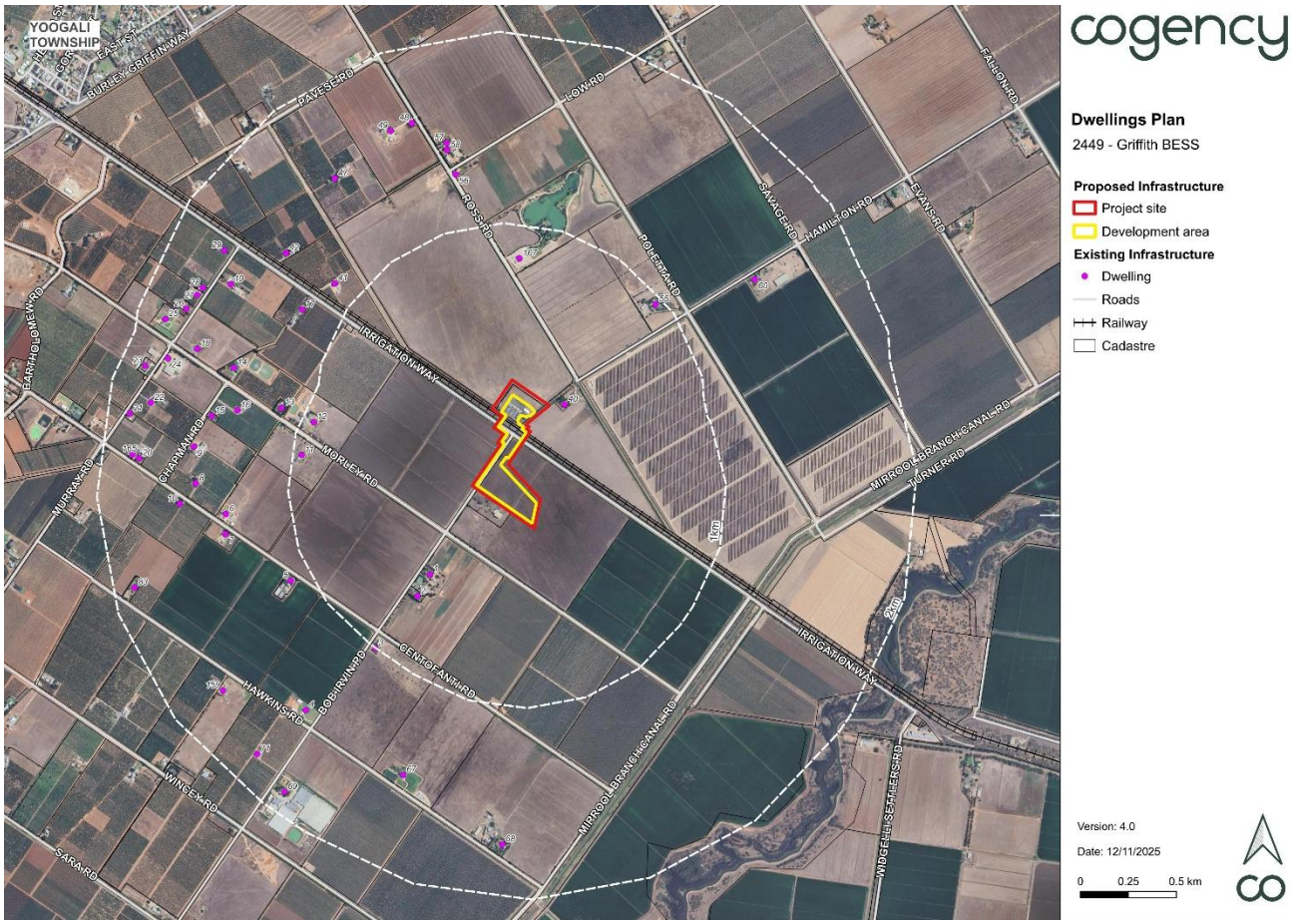


Figure 6 – Dwellings within 2km

[4] Land and Soil Capability – Central West Catchment Management Authority (2008)

Figure 7 – Land and Soil Capacity Plan

2.2.3 Aboriginal heritage

An Aboriginal Cultural Heritage Due Diligence Assessment (ACHDDA) was completed in May 2025 based on desktop and field surveys of the Development Area.

A desktop assessment using the NSW Government's Aboriginal Heritage Information Management System (AHIMS) Search Tool measuring approximately 2 kilometres surrounding the Project Site, and additionally on the Project Site itself has been undertaken.

While there were no records within the Project Site, there are 35 records of sites within a 2km radius. The closest, 49-2-0153 "Yoogali Site 3, Artefact", is located approximately 400m north of the BESS Area, next to the Griffith Substation.

A walkover of the Development Area found zero Aboriginal artefacts, objects, places, undisturbed areas of potential, or culturally modified trees. It was also acknowledged that mechanical disturbance to the Project Site over many years of agricultural use have likely permanently altered any pre-existing natural landscape features.

2.2.4 Historic heritage

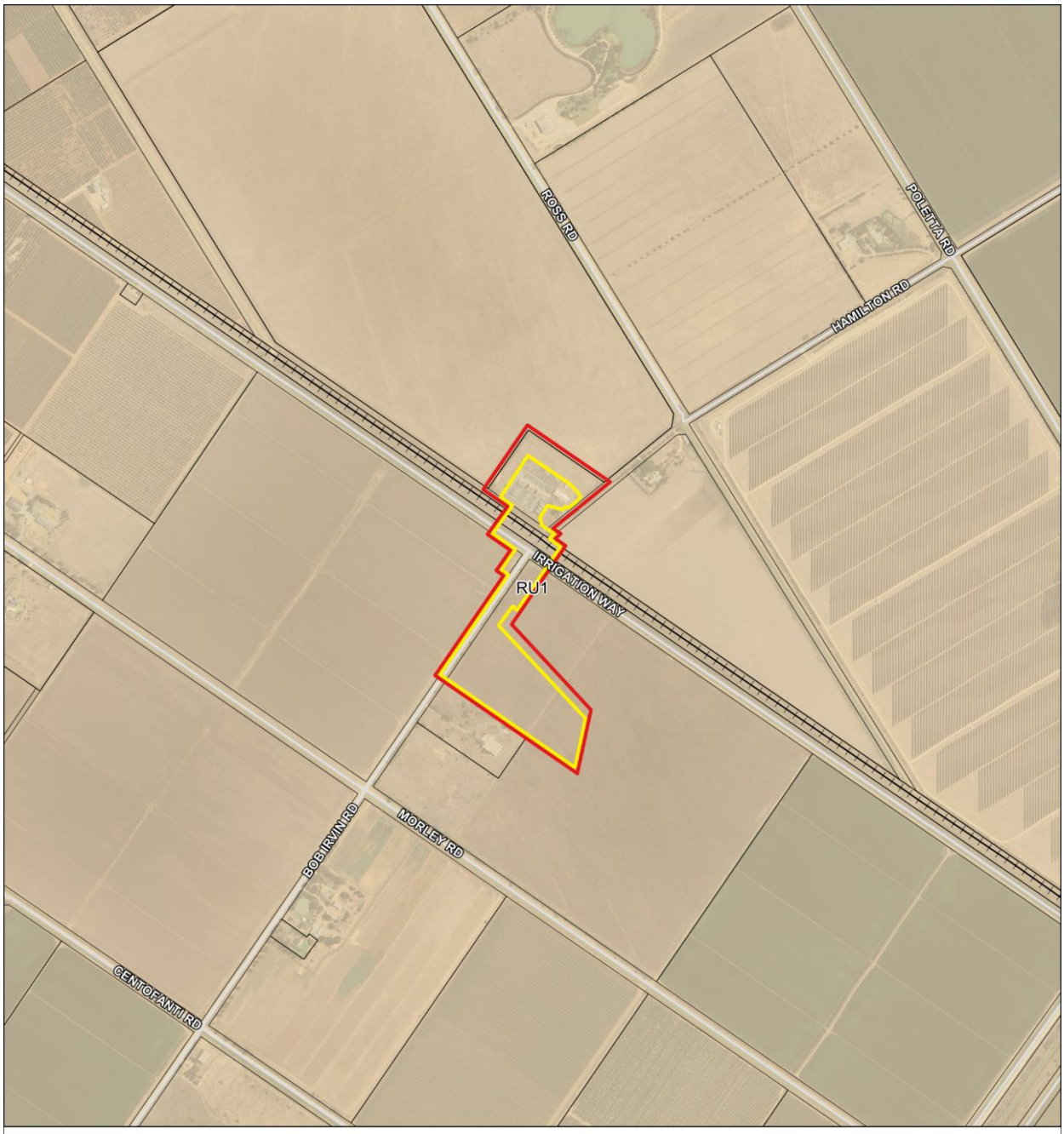
There are no sites recorded on the NSW State Heritage Register nor World Heritage Sites list within the vicinity of the Project Site. There are similarly no records on the Australian Heritage Database for the entirety of Yoogali.

2.2.5 Land Categorisation under the Land Management Framework

The Project Site is zoned RU1 – Primary Production under the Griffith Local Environmental Plan 2012 (LEP). Under the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (T&I SEPP) electricity generating works are permitted with consent in RU1.

As discussed above, under the NSW Land and Soil Capacity (LSC) assessment scheme, the land within the Project Site is classified as Class 3 (Figure 7). This land class represents high capability land with only moderate limitations that must be actively managed to achieve agricultural productivity.

The zoning of the Project Site and surrounds are illustrated in Figure 8. There is no other immediate zoning to the Project, aside from RU1.



Zoning Plan

2449 - Griffith BESS

0 0.25 0.5 km

LEGEND

Proposed Infrastructure
- Project Site
- Development Area

Existing Instructure
- Roads
- Railway
- Cadastre

Land Zoning
- RU1 - Primary Production

Version: 2.0

Date: 12/11/2025

Disclaimer: This plan is preliminary and subject to detailed studies and approval.

cogency

Figure 8 – Zoning Plan

2.3 Key risks and hazards

2.3.1 Hydrology and Waterways

To the north of the Project Site running parallel to Irrigation Way, there is an existing 20 m wide open irrigation channel. Along Bob Irvin Road, along the western edge of the Project Site, there is a 3m water pipeline supplying to a previous dwelling at 41 Bob Irvin Road. The broader area is irrigated and forms part of MIA within the Murray Darling Basin. The Mirrool Creek runs approximately 2 km south and southeast of the Project Site and the major Murrumbidgee River runs 30 km south of the Project Site. The broader catchment is drained via the Mirrool Creek Branch Canal which is located closer to eastern boundary of the Project Site.

Griffith has been prone to flood events in the past and as such, the Mirrool Irrigation Area which sits as a sub area of MIA, has been examined and more directly managed by Griffith City Council.

In 2012, a record flood event occurred within this catchment which saw 147 mm of rain fall within 16 hours, exceeding a 0.1% AEP. While the Project Site itself was not inundated, much of the surrounding region suffered significant infrastructure damage and has experienced ongoing social trauma. As described in the investigation of the flood event Griffith Main Drain J and Mirrool Creek Flood Study (BMT WBM, 2015):

> *"There are two main mechanisms governing flood behaviour in the Main Drain J catchment. Runoff from within the catchment produces high flow conditions within the irrigation drainage channels and presents a flood risk to communities such as Yoogali, Hanwood and other areas adjacent to Main Drain J. Significant floods within the Mirrool Creek catchment also present a risk to the community of Yenda, as evidenced by the March 2012 flood. Myall Park can flood from both local catchment runoff and Mirrool Creek flood events."*

Models by this most-recent study found that the Project Site is not expected to be subject to flooding under any of 10%, 5%, 2%, 1%, 0.5%, or 0.2% AEP scenarios and is subsequently not covered by the Flood Prone Area extent (Torrent Consulting, 2021). This is largely due to the protection afforded by the Mirrool Canal and Creek.

Advice provided by the NSW DCCEEW confirms that whilst the Project is mapped within the Main Drain J catchment, it is not 'considered not prone to mainstream flooding' (Figure 9). The *Griffith Main Drain J and Mirrool Creek Flood Study* (2015) is not conclusive in its assessment of direct flood risk of the Project, and thus risk assessment has been supplemented by the reporting undertaken by HARC which has confirmed there is a minimal level of flood risk resulting from the Project, nor that the Project is in threat of.

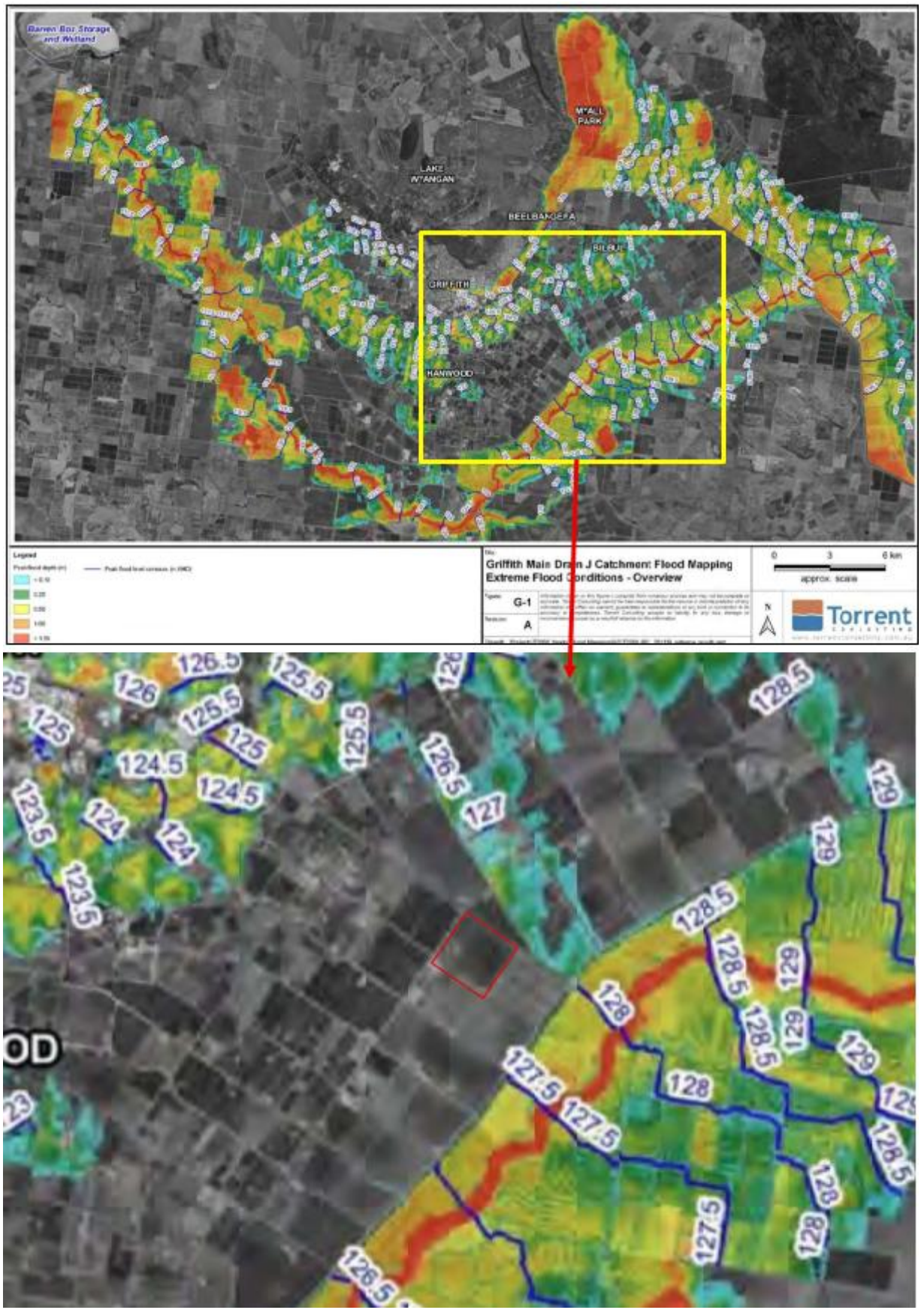


Figure 9 – Flood Extend from Griffith Main Drain J and Mirrool Creek Flood Mapping (2021) (Appendix M)

2.3.2 Bushfire Risk

Parts of the primary Project Site are located within a designated bushfire prone area under the NSW Rural Fire Service land mapping. The Indicative BESS Area itself (2/DP1252779) is not mapped as Bushfire Prone Land, however Category 0 'vegetation buffer' mapping applies to the interior perimeter of lots 1/DP1252779 and 2/DP1252779, affecting the Indicative BESS Area and Transmission Corridor (Figure 10).

The vegetation buffer of 30 m from Category 3 land is to identify vegetation and areas where there is the highest risk of ignition from surrounding bushfire. Category 3 land, which wholly covers Bob Irvin Road, Irrigation Way and the Griffith Substation, is medium bushfire risk vegetation.

Additionally, land in the Transmission Corridor between beyond lot 2/DP1252779, including Irrigation Way and the Griffith Substation, is mapped as Category 3 'medium bush fire risk vegetation'.

The wider region has not been subject to significant bushfire activity historically, however there are persistent fire threats. Swathes of parcels in Yoogali, east of the Project Site, are Category 3 Bushfire Prone Land which marks a 'medium bushfire risk'.

The Bushfire Prone Land in the surrounding area has been mapped in Figure 10.

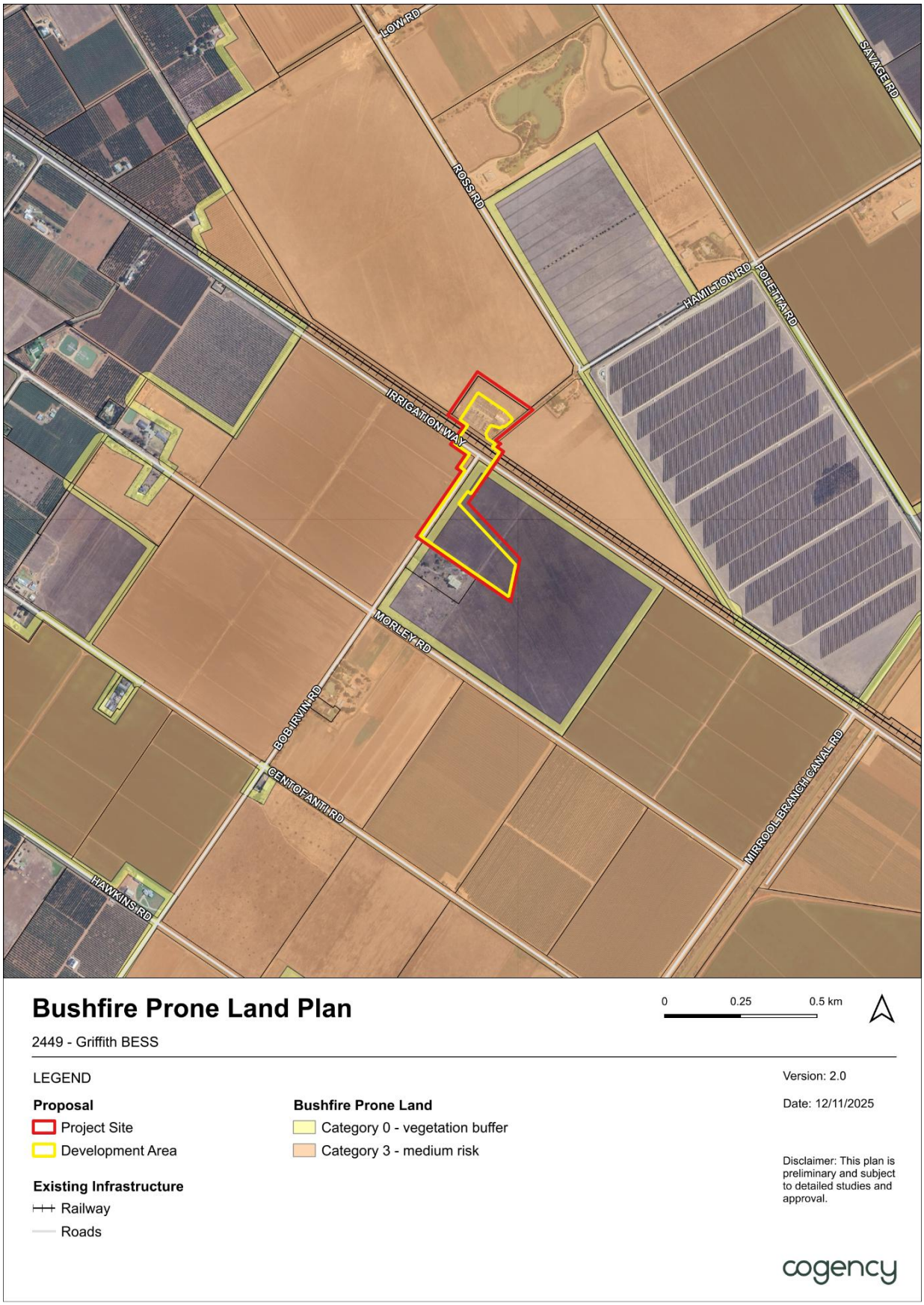


Figure 10 – Bushfire Prone Land Plan

2.4 Cumulative impacts

Cumulative impact, as defined in the NSW *Cumulative Impact Assessment Guidelines for State Significant Projects (2022),* are the 'result of incremental, sustained and combined effects of human action and natural variations over time and can be both positive and negative.'

There are several renewable energy projects proposed or operational in Yoogali and across the Griffith LGA that may generate cumulative impacts (see Section 6.13). In particular, there are three solar farm projects within 1.5 km of the Project that propose to connect to the Griffith Substation where cumulative impacts are likely to occur due to their proximity.

- The Riverina Solar Farm (SSD-7482) is an approved 30 MW solar farm located northwest of the Project, surrounding the Griffith Substation and surrounding parcels along Ross Road and Irrigation Way. Since its approval in 2016, there has been little activity on the site by means of construction. It is unknown when the full construction program is due to commence, however when operational, it is planned to connect underground with a 32 kV transmission line into the Griffith Substation.
- The Yoogali Solar Farm, approved by Griffith City Council in 2019 (DA 291/2018), is located on the balance of land at 15 Bob Irvin Road (2/DP1252779) not used for the Griffith BESS and 41 Bob Irvin Road (1/DP1252779), both being contiguous and commonly owned land. In October 2025, DA 291/2018 was modified by Griffith City Council to approve a realigned solar array layout and re-subdivision of lots 1 and 2 in DP1252779 to place the Griffith BESS and Yoogali Solar Farm each on separate and dedicated lots.
- Hawkins Road Solar Farm, approved by Griffith City Council in September 2025 (DA 189/2023.2), is located approximately 1.2 km southeast at 293 Hawkins Rd, Yoogali. The Solar Farm includes a sub 5 MW BESS and intends to connect into the nearby 33kv overhead line. It is unknown when the full construction program is due to commence.

Consideration of cumulative impacts associated with surrounding development has been assessed in accordance with the Cumulative Impact Assessment Guidelines for State Significant Projects and discussed in Section 6.13.

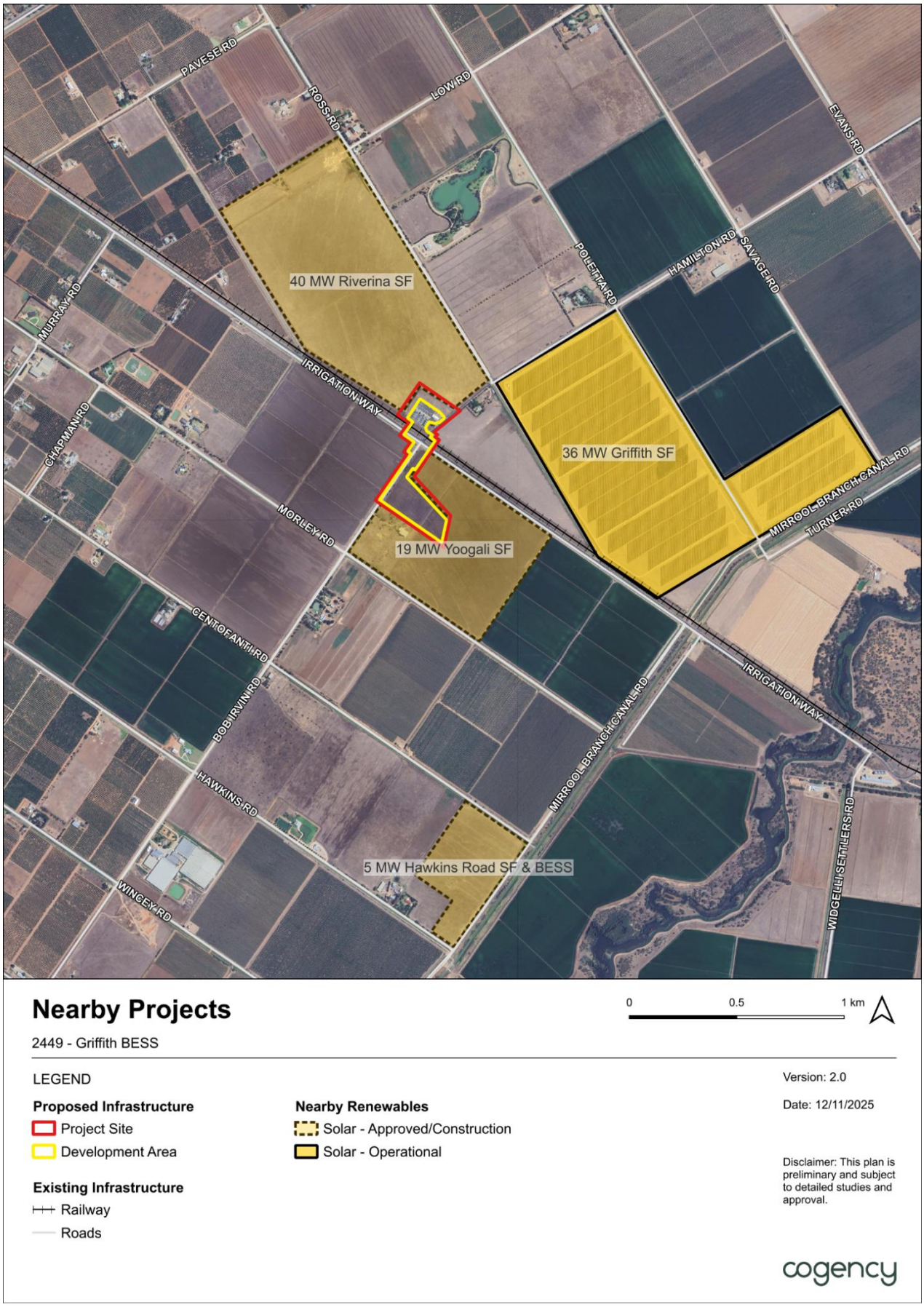


Figure 11 – Nearby Major Projects Plan

2.5 Project alternatives

During the planning and design phase of the Project, a range of alternatives were considered by the Proponent in response to technical assessments and community feedback to minimise potential adverse impacts. The alternatives considered included:

Alternative Location

The Project Site's characteristics are highly conducive to BESS development. The Project Site is traversed by two existing transmission lines, is located close to a State Road, on surplus land with insignificant agricultural capacity and limited ecological value. Importantly, the Project Site is immediately adjacent to existing electrical infrastructure, including the Griffith Substation, two 132kV transmission lines, and three solar farm projects that are either operational or approved. Locating the BESS amongst this electricity infrastructure creates a level of cohesion in the land uses of the area, meaning that the visual impact of the BESS is somewhat mitigated through the highly modified landscape.

A majority of the Project Site has been approved for the Yoogali Solar Farm by Griffith City Council in 2018. This decision is emblematic of the Project Site's agricultural potential being outweighed by a need for renewable energy assets in the area. This Project seeks to enhance the development potential of the land, without consuming further agricultural land, by reallocating the boundaries of the approved Yoogali Solar Farm to allow for an independent BESS to nestle adjacent.

When choosing a potential site for the BESS, the final Project Site, in terms of its features and availability for such a development, was the best choice. Where other sites may have been somewhat suitable in their landscape and topography, they were unavailable for development or lacked the unique location and siting amongst other electrical infrastructure.

Alternative Siting

Within the Project Site, the BESS siting has been chosen for the optimal proximity to the Griffith Substation, given the desired size of the battery compound itself, as well as the easement and associated infrastructure for the existing 132 kV Griffith to Yanco transmission line. Moving further south along Bob Irvin Road, or easternly along Irrigation Way would increase the cost and scale of transmission infrastructure required to connect the BESS to the Griffith Substation because of the increased distance. Crossing the easement to the north would require reducing the physical area of the BESS, likely lowering the capacity of the Project to an undesirable level.

The final siting was also informed by the design considerations of the approved Yoogali Solar Farm, also on the same site. The allocated space on the parcel to the Project allows the Yoogali Solar Farm to also make a meaningful contribution to the NEM, whilst remaining commercially viable. This has informed the reasoning as to why the title of the Project does not largely encroach upon the narrow strip of land between Irrigation Way and the transmission line easement. This has been maintained for the solar farm, as the panels can better fill this space.

BESS Technology and Provider

The Proponent, in the development and design of the BESS, has chosen Lithium-ion technology for the battery units. This was considered over other available technologies due to the cost of implementation, usable life, and the physical space required of such battery units in meeting the desired storage and duration combination.

Emerging battery technologies, such as solid-state batteries, sodium-ion batteries and flow batteries are being developed to address the limitations of current lithium-ion technology. These innovations promise benefits like higher energy densities, faster charging times and enhanced safety. However, despite these advancements, lithium-ion batteries remain the most advanced and dependable technology available today. Their proven track record, established manufacturing processes, and continuous incremental improvements ensure that lithium-ion batteries continue to be the preferred choice for a wide range of applications, particularly large-scale energy storage needs.

The brand/provider of the battery units is still under consideration. The final choice will be informed by the quality, cost, and availability of a unit in meeting the capacity and duration desired for the Project.

Smaller BESS

When determining the split between the BESS and solar farm of the entire land parcel at 15 & 41 Bob Irvin Road, Yoogali, a smaller capacity/duration BESS was considered as an alternative pathway for the project. Under the approval for the Yoogali Solar Farm by Griffith City Council in 2019 (DA 291/2018), there was provision for an ancillary 10 MW BESS. The decision to move away from this dual delivery has been influenced largely by the changing priorities for renewable energy infrastructure since 2019.

High levels of uptake of rooftop and commercial solar installations across Australia have resulted in increased instances of daytime generation excess that cannot be adequately captured and utilised within the grid. The prominence of utility-scale BESS installations across Australia from the early 2020s has aimed at increasing the capacity of the grid to absorb excess generation to then release in peak periods where often, the sun is not shining.

Thus, a smaller BESS was rejected on the basis of the necessity of larger BESS installations in assisting the uptake of further renewable energy facilities by increasing grid capacity.

Transmission Line

A direct transmission connection and associated easement to one of the bays at the nearby 132kV/330kV Griffith Substation through a combination of underground and overhead cabling is being considered, subject to further design development.

Multiple route options are being explored, subject to ongoing consultation with Transgrid. The EIS has assessed these options, and ultimately, one option will be selected through this process.

Alternative transmission routes were also explored, including both overhead and underground routes extending northwards to the Griffith Substation, however these alternative options were either less direct, transgressing land in different ownership, or conflicting with existing features such as easements.

Do nothing

The ‘do nothing’ option would involve not constructing and operating the Project at the Project Site. The identified objectives and benefits of the Project would not be realised. While this approach may alleviate potential cumulative and amenity impacts, it would not support the Commonwealth and NSW Government and local or regional strategies and policies to reduce emissions, improve grid stability resilience, and increase investment in regional communities and new technologies. As such, it is considered that this option is not in the public interest.

3. Project description

This section provides a comprehensive description of the Project in full, covering the various aspects and associated works of the construction, operational and decommissioning phases of the Project.

This section seeks to address the following SEARs EIS requirements in some or full capacity:

- *a full description of the development, including:*
  - *details of construction, operation and decommissioning, including any staging of the development;*
  - *a description of the physical elements of the development including the form, maximum height and materials (including ancillary infrastructure);*
  - *a high quality site plan at an adequate scale showing all infrastructure and facilities (including any infrastructure, and accommodation camps, that would be required for the development, but the subject of a separate approvals process);*
  - *the Project Area (as per Table 1 of the SSD guidelines – preparing an environmental impact statement) and Development Footprint (disturbance area including but not limited to areas for infrastructure, road works, access tracks, defendable space, fencing and temporary laydown);*
  - *a high quality detailed constraints map identifying the key environmental and other land use constraints that have informed the final design of the development.*
- *consistency in information presented in the EIS and all technical reports, including distances, development footprint, project design and infrastructure proposed, construction timeframes and receiver numbers*
- *an assessment of the likely impacts of the development on the environment, and any other significant issues identified in the above risk assessment, focusing on the specific issues identified below, including;*
  - *a description and assessment if staging of the project is proposed including any site mobilisation or pre-construction works;*
  - *a description of the measures that would be implemented to avoid, mitigate and/or offset the impacts of the development; and*
  - *a description of the measures that would be implemented to monitor and report on the environmental performance of the development.*

3.1 Overview

The Project involves the construction, operation and decommissioning of a BESS with a nominal capacity of up to 100 MW / 1000 MWh. The Project includes a 132kV transmission connection between the Project's onsite substation and the adjacent Griffith Substation, traversing Irrigation Way and the Yanco-Griffith Railway. It will supply electricity to the NEM during peak demand periods.

A BESS operates by storing electrical energy for later use and are becoming increasingly crucial for grid stabilisation, integrating renewable energy and providing backup power during times of variable electricity generation. The Project will be a typical BESS installation, consisting of lithium-ion batteries, a Battery Management System (BMS) for monitoring, inverters to convert Direct Current (DC) to Alternate Current (AC) electricity, a cooling system, noise suppression systems and a control system. The Project would also involve a direct transmission connection to the adjacent 132 kV/330 kV Griffith Substation through transmission connection comprising an either overhead and underground solution (route alignment subject to further investigation and agreement with Transgrid), perimeter fencing, internal access tracks and road upgrade works.

The BESS has been configured within the broader landholding as such to minimise the reduction in size of the collocated Yoogali Solar Farm, whilst also retaining proximity to the Griffith Substation and access via Bob

Irvin Road. Access to the BESS will be facilitated via an access point along Bob Irvin Road, approved as part of the Yoogali Solar Farm (but no longer required as part of the solar farm).

A summary of the key elements is provided in Table 6 and the indicative layout is provided in Figure **12**.

Table 6 – Project Summary

Project element	Description
Site address	15 Bob Irvin Road Yoogali 2680 (**Indicative BESS Area** and **Indicative Transmission Corridor**) Part of 11 Hamilton Road Yoogali 2680 (**Griffith Substation**) Part of 2778 Centofanti Road Yoogali 2680 (**Indicative Transmission Corridor**) Part of Irrigation Way, Bob Irvin Road, Yanco-Griffith Railway (**Access** and **Indicative Transmission Corridor**)
Title details	2/DP1252779 (proposed 11/DPx) Part of 1/DP865611 Part of 139/DP751709 Part of 11/DP1198376 Part of 2500/DP1195971
Project Site	~48 ha
Development footprint	~6 ha
Operational BESS area	~2 ha
Storage capacity	100 MW / 1000 MWh
Ancillary infrastructure	▪ Control room ▪ Access tracks ▪ Transformers ▪ Site office ▪ Carpark ▪ Fencing ▪ New switch bay and bench extension in Griffith Substation (subject to needs assessment and direction from Transgrid).
Grid connection	132 kV, overground or underground (options being explored within the 'Indicative Transmission Corridor') to the Griffith Substation.
Site access	Site access will be facilitated through a new crossover to be established on the western boundary of the Project Site on Bob Irvin Road, approved as part of the Yoogali Solar Farm, but now no longer required for the Solar Farm. Secondary access will also be created from Bob Irvin Road. Access tracks will be established entirely independent of those for the Yoogali Solar Farm, which will also likely use Bob Irvin Road for access.
Employment	150 FTE during construction, 2.5 FTE during operation.
Construction	The construction period is expected to be 22 months with ideal construction commencement by 2026. Construction activity is expected to be able to occur within standard construction hours.
Vehicle movements	In the peak of the construction period, 110 to 170 light and 30 to 100 heavy vehicle movements are expected at the Project Site daily. During operation, up to 10 light vehicles are expected at the Project Site daily, with heavy vehicles only expected during annual inspections.
Operation lifespan	25 years
Decommissioning	During the construction period, the Development Area will be continually decommissioned where areas of the Project Site are no longer required for construction use. At the end of the BESS lifespan, a Decommissioning Strategy will be presented to the landholder and DPHI for review. At this point, the land will be returned to agricultural use if that is what decided as the best outcome.

3.2 Project area

The Project Site includes one primary title and five secondary titles. The primary title (2/DP1252779), addressed as 15 Bob Irvin Road, Yoogali, will comprise the final BESS site and most of the associated infrastructure. It is proposed that this lot will be re-titled as Lot 11 (Deposit Plan yet to be determined) in accordance with subdivision approved by DA 291/2018, separate to this EIS and DA.

These are summarised in Table 7.

Table 7 – Summary of Project Site components

Project Site	Components	Addresses	Lots
Indicative BESS Area	Battery units Inverters Transformer Switch room Control building Workshop Water tanks Water detention basin Laydown area Access tracks Primary access Secondary / emergency access	15 Bob Irvin Road Bob Irvin Road	Part 2/DP1252779 (Approved 11/DPx) Road reserve
Indicative Transmission Corridor	Transmission cable (above or below ground to be determined), trenching and pylons as required Connection to substation bay	15 Bob Irvin Road 2778 Centofanti Road 11 Hamilton Road, Griffith Substation Irrigation Way, MR8 Irrigation Way, drainage Yanco-Griffith Railway	Part 2/DP1252779 (Approved 11/DPx) 139/DP751709 1/DP865611 Road reserve 2500/DP1195971 11/DP1198376
Griffith Substation potential works area	Works to augment the Griffith Substation, subject to needs assessment and direction by Transgrid	11 Hamilton Road, Griffith Substation	1/DP865611

3.2.1 Primary Project Site land

This primary land for the BESS Area (2/DP1252779) is flat and cleared with limited remnant native vegetation aside from the road frontage onto Bob Irvin Road. It has historically included a dwelling, however this has been demolished. There is one shed remaining on the land that is intended to be demolished as part of the construction program of the Yoogali Solar Farm.

This parcel will be most disturbed by the construction of the BESS and will physically host majority of the associated infrastructure. In the design of the layout on the land, effort has been made to minimise disturbance particularly along the Bob Irvin Road reserve along the western boundary, as this is area with any notable native/exotic vegetation and limited habitat values.

Once established and in the operational phase, it is unexpected for any further disturbance to the land to occur until the decommissioning phase where a decision will be made as to how the land may be rehabilitated to cleared, agricultural land.

3.2.2 Secondary Project Site land

The Project Site also encompasses, fully or partially, five secondary titles. These are primarily for the sake of the transmission corridor from the BESS Area into the Griffith Substation, adjacent and across Irrigation Way to the Project. As a result, the Project Site and Development Area encompasses the following titles:

2778 Centofanti Road - 139/DP751709

Up to 1,000 square metres of the north-east corner of 2778 Centofanti Road (139/DP751709) may be accessed for hosting part of the transmission connection to Griffith Substation. Subject to further investigation, cabling will traverse from this land over or under Irrigation Way, the Yanco-Griffith Railway, and land owned by the MIA for a drainage reserve. This property is used for irrigated cropping, however the subject section proposed to be utilised for transmission comprises the periphery not actively cropped.

Irrigation Way (Yanco-Griffith Railway) - 11//DP1198376

This is a narrow landholding between Irrigation Way to the south and the Irrigation Way drainage reserve to the north. It currently contains a single, unelectrified, standard gauge rail track that connects passengers and freight between Yanco and Griffith semi-regularly. The implication for this land as a result of the Project is likely to be minimal, as the 132 kV line connecting the BESS and the Griffith Substation will either be overground or underground, well within clearance of the railway in this section. This parcel is owned by Transport for NSW and managed by UGL Regional Linx.

Irrigation Way (drainage reserve) - 2500//DP1195971

Up to 1,229 square metres of this drainage reserve land may be accessed for transmission to Griffith Substation either overhead or underground. No works within this parcel are anticipated.

Irrigation Way (road reserve)

Irrigation Way is an NSW State Road, as designated by Transport for NSW. It is a two-lane road connecting Yoogali to Griffith moving northwest from the Project Site; as well as the town of Leeton, southeast from the site.

In addition to the road itself, there is a 10 m wide irrigation channel on the southern side of the roadway that is managed by Murrumbidgee Irrigation. This irrigation channel, from which Irrigation Way its name from, is a critical asset to the broader MIA.

The disturbance to Irrigation Way, both in the roadway and irrigation channel is expected to be minimal during the operation phase of the Project as the 132 kV transmission line connecting the BESS Area to the Griffith Substation cross Irrigation Way either overhead or underground. However, during the construction and decommissioning phase, any impact will be managed through Transport for NSW and MIA directly as the responsible authorities.

11 Hamilton Road, Yoogali (Griffith Substation) – 11/DP1198376

The Griffith Substation, owned and operated by Transgrid, will provide the interface between the Project and the NEM. The Griffith Substation is equipped with three 132 kV bays that currently supply the local 33 kV network as well as connecting to the 132 kV lines to Darlington and Yanco.

In the process of establishing the connection between the Project and the Griffith Substation, disturbance is expected to occur within the parcel boundary as the 132 kV line is retrieved from underground or routed from the new overground line into a new connection is established at one of the three bays. Installation of new pylons for the new 132 kV line is expected to be the primary work undertaken, as well as the cabling required along the BESS' 132 kV line. This work will be overseen and approved by Transgrid on previously highly disturbed and industrialised land.

The Project will connect into a new 132 kV bay to be installed for the Project, from pylons to be installed within the substation land on the existing cleared land south of the substation footprint itself. A bench extension may be required to facilitate the proposed new switchbay, and any associated cabling within the Griffith Substation. Further detail on the exact infrastructure requirements at and into the Griffith Substation will be determined in coordination with Transgrid.

3.3 Project layout and design

This Section describes the proposed layout and design which form the physical elements of the Project.

3.3.1 BESS Area

The BESS Area consists of all the Project elements except for the transmission connection. The key elements are detailed below including the battery units, onsite substation, transformers, access tracks, operations and maintenance buildings. See Figure 12 for the Site Layout Plan.

3.3.1.1 Battery Units

The Indicative BESS Area of the Project will comprise up to 222 lithium-ion battery modules installed in banks in rows of seven or eight. Each unit is approximately 2.9m high x 6m long x 2.4m wide (Figure 13). The minimum separation distance between each unit is 2.5m. At maximum capacity, these will be capable of outputting up to 100 MW of power of and storing up to 1000 MWh of energy.

3.3.1.2 Onsite substation

A substation will be located onsite to allow the BESS to connect to the NEM by stepping voltage up and down. The substation includes a 33kV switch room, control building, capacitor bank area, a 33/132kV transformer and outdoor switchgear.

The main transformer is approximately 6.5m high, and the control building is 5.7m high.

3.3.1.3 Associated Electrical Infrastructure

Accompanying the battery modules will be inverters and transformers, enabling connection to the Griffith Substation. Beyond these, a control room will be installed to allow direct physical interface with the battery controllers. A site office, for any staff present on site during the operational phase will also be located within the BESS area, with car parking and other basic amenities provided.

Other associated infrastructure includes:

- O&M building: Estimated building height of 3.7m
- O&M Warehouse: 4m high
- 2x 250kL fire water tanks: 2.5m high
- Spare parts shipping containers: 2.6m high. The domed canopy between the two containers brings the total height to around 5m.

3.3.1.4 Access tracks

Primary site access for construction and operational purposes will be created from Bob Irvin Road, approximately 200 metres south of Irrigation Way. This access will be constructed in advance of the proposed works as part of a separate development consent granted by Council for the Yoogali Solar Farm (DA 291/2018) and is assumed to be an existing condition for the purpose of this Project. Accordingly, no additional permissions are sought by this application for the primary access.

A secondary site access for emergency purposes will also be established on Bob Irvin Road, on the south-western edge of the Project Site, approximately 300 metres from Irrigation Way. Impact to native vegetation will be avoided in the creation of this secondary access.

Both primary and secondary access will connect to internal access tracks, providing complete coverage to each row of battery units and around the perimeter following the inside of the security fence. Access tracks will be provided at a minimum of 4 metres to enable safe access by emergency service vehicles. The exact position of the roads will be determined during the detailed design phase. Internal access tracks are private roads designed and constructed only for construction, operation and maintenance purposes.

3.3.1.5 Earthworks and drainage

Topsoil will be scraped from the BESS area and new clean fill imported to help create a consistent and stable foundation for installation of the battery modules and other infrastructure. Any topsoil removed will be retained on site. Noting the extremely flat existing topography of the Site, the BESS area will be graded to allow stormwater to drain into water detention basins located outside the BESS area. These basins will prevent any change to the existing flows of water and sediment across boundaries and also accommodate the capture of any firefighting water, should it be used on site, allowing for safe disposal. Detailed design of the water detention basins will continue to be developed.

Additional earthworks will be required for electrical transmission and cabling, including cut-and-cover trenching underneath the existing high-voltage transmission easement. Should the transmission connection to the Griffith Substation be made via an underground connection, it is expected that horizontal directional drilling will be used between across Bob Irvin Road, land in 2788 Centofanti Road, Irrigation Way, and the Yanco-Griffith Railway. This will result in negligible ground disturbance for the majority of the transmission corridor and no significant changes to surface or drainage conditions are expected.

3.3.1.6 Potential New Switch Bay at Griffith Substation

To enable the grid connection of the BESS, a new switch bay may need to be installed at Transgrid's Griffith 132 kV substation. This may require extending the switchyard bench to the south to accommodate the new switch bay and associated high-voltage equipment. Additionally, underground cable connections may be installed through the Griffith 132 kV switchyard to connect the new switch bay equipment. Further detail will be determined in coordination with Transgrid.

Figure 12 – Site Layout Plan

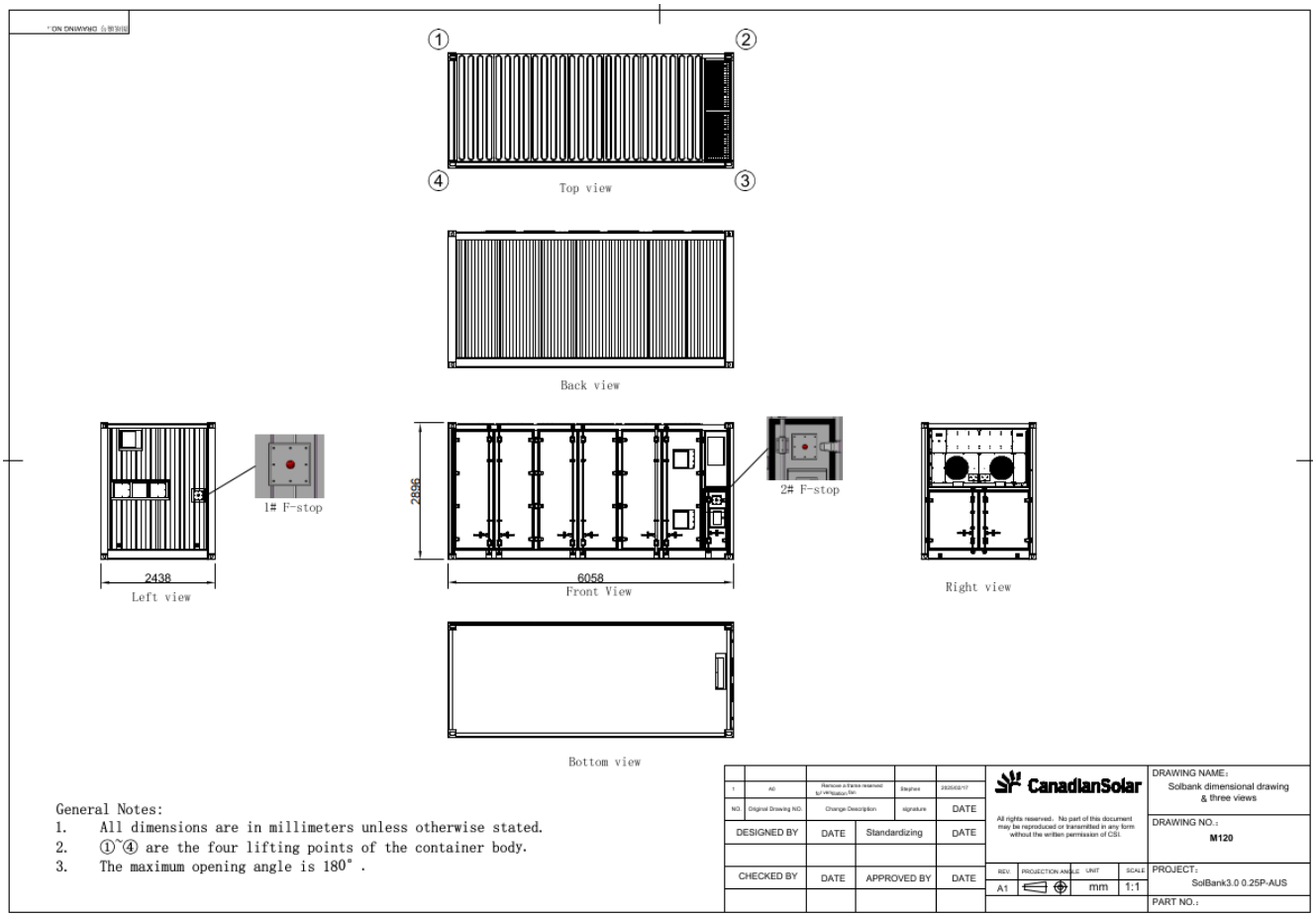


Figure 13 – BESS Unit elevation

3.4 Proposed activities

3.4.1 Construction

The construction phase of the Project is expected to last approximately 22 months, with a planned start date in 2026. During the construction phase, traffic levels accessing the Project Site are expected to range between 110 – 170 light vehicles and 30 – 100 heavy vehicles per day. These movements will fluctuate depending on the intensity of the period of construction.

Key activities and milestones of the construction phase are:

- Preparation of the site for BESS and associated infrastructure installation, including site levelling.
- Delivery and installation of battery units and associated infrastructure.
- Transmission line connection to Griffith Substation.
- BESS pre-electrification and testing prior to operation.

Across this period, the Project and related contractors are expected to employ 150 FTE staff. This has been estimated from the experience of the Proponent in similar installations, as well as the industry averages for BESS.

3.4.2 Operational

The operation of the Project would involve the storage of energy during periods of low demand and discharged during periods of high demand. The storage and discharge of electrical energy occurs independently of any external activity or physical movements. In other words, the BESS structure and facility

remain in a constant physical state regardless of operational status. Sophisticated computer systems control the functioning of each BESS unit.

Within the operational phase, there is minimal day-to-day activity relative to the construction phase. Operational activities involve remote monitoring of equipment daily and site and equipment maintenance as required, likely requiring 2.5 full-time staff. Traffic movements would be minimal with light vehicles occasionally requiring access for maintenance activities. Heavy vehicles may also occasionally require access to replace larger components as necessary.

An Operational Environmental Management Plan (OEMP) will be prepared to mitigate and manage environmental impacts during operation.

3.4.3 Decommissioning

At the end of operation, the Project will be fully decommissioned including:

- Removal of all above-ground, non-operational equipment.
- Removal of any underground equipment buried at a depth shallower than 0.5 meters.
- Cleanup of any residual contamination and disposal of any generated waste.

Opportunities for repurposing the facility, re-using equipment, and recycling materials will be investigated during decommissioning. Any materials that cannot be re-used or recycled will be disposed of at an appropriate facility.

A decommissioning plan will be prepared when required at the Project's end of life. The Project area will be returned a condition suitable for dryland cropping unless it is required for an alternative land use.

4. Statutory context

The EP&A Act and the EP&A Regulation provide the framework for planning and approval and environmental assessment in NSW. The EP&A Act and Regulation are supported by a number of environmental planning instruments, which include State Environmental Planning Policies (SEPPs) and Local Environmental Plans (LEPs). This section outlines the key statutory requirements for the Project under the EP&A Act and other Local, State and Federal Government Guidelines.

This section seeks to address the following SEARs EIS requirements in some or full capacity:

- *a full description of the development, including:*
  - *confirmation if the project is designated development in accordance with the Environmental Planning and Assessment Act 1979 (EP&A Act) and the EP&A Regulation;*
- *a detailed evaluation of the merits of the project as a whole, having regard to:*
  - *the requirements in Section 4.15 of the EP&A Act, including the objects of the Act and how the principles of ecologically sustainable development have been incorporated in the design, construction and ongoing operations of the development.*

4.1 NSW Planning Framework

The EP&A Act and the EP&A Regulation provide the overall framework for guiding land use planning and development controls within NSW. This broad framework establishes the roles of state, regional and local planning authorities and also includes regional plans that set long-term visions for growth and development. The EP&A Act and EP&A Regulation are supported by several Environmental Planning Instruments (EPIs), which include SEPPs and the LEP.

Part 4, Division 4.7, Section 4.36(2) of the EP&A Act states:

A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

Section 2.6(1) of the Planning Systems SEPP 2021 states:

(1) Development is declared to be State significant development for the purposes of this Act if-

a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and

b) the development is specified in Schedule 1 or 2.

Clause 20(a) of Schedule 1 of the Planning Systems SEPP 2021 declares electricity generating works (using any energy source including wind) that has an estimated development cost of more than $30 million.

Accordingly, the Project is considered SSD under Section 4.36(2) of the EP&A Act in conjunction with Section 2.6(1) and Clause 20(a) of Schedule 1 of the Planning Systems SEPP 2021, since it is not permissible without consent under Part 4 of the Act, defined as electricity-generating works, and has an anticipated development cost in excess of $30 million.

Under Section 4.12(8) of the EP&A Act, a development application (DA) for SSD is to be accompanied by an EIS that meets the requirements the EP&A Regulation. This EIS has been prepared to respond to the SEARs received for the Project on 23 June, 2025 (SSD-85372970).

Were it not an SSD, the Proposal would be a declared designated development—'battery storage facilities'—under Schedule 3 Part 2 Section 7 of the EP&A Regulation.

4.2 Statutory Requirements for the Project

Table 8 and Table 9 identify the relevant statutory requirements for the Project and where they have been addressed in this EIS.

Table 8 – NSW Statutory Requirements

Statutory Matter	Statutory Reference	Consideration
Power to grant consent	▪ Part 4, Section 4.5(a) and 4.36(2) of the EP&A Act ▪ Section 2.6 of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP) ▪ Clause 20(a) of Schedule 1 of the Planning Systems SEPP	▪ The Project is an SSD ▪ The consent authority for SSD is the Minister for Planning and Public Spaces or the Independent Planning Commission in the event that the Council or community (over 50 submissions) object to the proposal ▪ The assessment will be coordinated by DPHI.
Permissibility	▪ Part 2 of the Griffith LEP ▪ Section 2.7 of the T&I SEPP ▪ Section 2.36 of the T&I SEPP	▪ The Project Site is located within the RU1 Primary Production Zone and the proposed use, electricity generating works, is not permissible with consent in this zone; However: ▪ Section 2, Section 2.7 of the T&I SEPP: overrides any inconsistencies between the instruments. ▪ Section 2.36(1)(b) of the T&I SEPP: allows for the development for electricity-generating works with consent on land in a non-prescribed residential zone ▪ Considering the above, the Project is permissible with consent.
Other approvals	▪ *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) ▪ *Native Title Act 1993* ▪ *Biodiversity Conservation Act 2016* ▪ *Biosecurity Act 2015* ▪ *Contaminated Land Management Act 1997* ▪ *Crown Land Management Act 2016* ▪ *Electricity Supply Act 1995 and Electricity Network Assets (Authorised Transactions) Act 2015* ▪ *Native Title (New South Wales) Act 1974* ▪ *Protection of the Environment Operations (POEO) Act 1997* ▪ *Roads Act 1993* ▪ *Waste Avoidance and Resource Recovery Act 2001*	▪ The Project may need to seek approvals as required under these Acts.
Pre-conditions to exercising the power to grant consent	N/A	▪ No pre-conditions to exercising the power to grant approval have been identified for the Project.
Mandatory matters for consideration	▪ Section 4.15 of the EP&A Act ▪ Requirements of other legislation (refer to 'Other approvals')	▪ What the consent authority must take into consideration ▪ What approvals the Project will need to seek under other Acts (refer to 'Other approvals')

4.2.1 Power to Grant Consent

The EP&A Act sets out that the applicable approval pathway for the Project as the State Significant Development (SSD) process. The Project will require SSD Approval pursuant to Clause 4.36 of the EP&A Act:

> *4.36 Development that is State significant development*
>
> *(1) For the purposes of this Act, State significant development is development that is declared under this section to be State significant development.*
>
> *(2) A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.*
>
> *(3) The Minister may, by a Ministerial planning order, declare specified development on specified land to be State significant development, but only if the Minister has obtained and made publicly available advice from the Independent Planning Commission about the State or regional planning significance of the development.*
>
> *Editorial note—*
>
> *For orders under this subsection, see the Historical notes at the end of this Act.*
>
> *(4) A State environmental planning policy that declares State significant development may extend the provisions of the policy relating to that development to State significant development declared under subsection (3).*

Section 2.35 of the T&I SEPP defines the Project as 'electricity generating works', being:

> *a building or place used for the following purposes, but does not include a solar energy system—*
>
> *(a) making or generating electricity,*
>
> *(b) electricity storage.*

The Planning Systems SEPP sets out SSD's at Schedule 1. The Project triggers SSD through Schedule 1, Clause 20:

> *20 Electricity generating works and heat or co-generation*
>
> *Development for the purpose of electricity generating works or heat or their co-generation (using any energy source, including gas, coal, biofuel, distillate, waste, hydro, wave, solar or wind power) that—*
>
> *(a) has a capital investment value of more than $30 million, or*
>
> *(b) has a capital investment value of more than $10 million and is located in an environmentally sensitive area of State significance.*

As the estimated capital investment value of the Project is greater than $30 million, and the Project requires development consent under Part 4 of the Act, the Project is required to be assessed as an SSD.

Part 4 Division 4.7 of the Act allows the consent authority to determine and grant consent for SSD development applications.

4.2.2 Consent Authority

The Minister for Planning and Public Spaces will be the consent authority for the Project in accordance with Division 4.2, Section 4.5 of the EP&A Act. However, in accordance with section 2.7 of the Planning Systems SEPP, the Independent Planning Commission (pursuant to clause 2.7 of the Planning Systems SEPP) is the consent authority for the following types of SSD:

a) *Development in respect of which the council of the area in which the development is to be carried out has duly made a submission by way of objection under the mandatory requirements for community participation in Schedule 1 to the Act,*

b) *Development in respect of which at least 50 persons (other than a council) have duly made submissions by way of objection under the mandatory requirements for community participation in Schedule 1 to the Act; and*

c) *Development the subject of a development application made by a person who has disclosed a reportable political donation under section 10.4 to the Act in connection with the development application.*

Therefore, the Minister for Planning and Public Spaces is the consent authority for this SSD application, if none of the above criteria are triggered, and DPHI will coordinate the assessment of the application on behalf of the Minister. The requirement for the IPC to be the determining authority is to be confirmed following the completion of the EIS public exhibition.

4.2.3 Permissibility

As identified above, the Project is considered 'electricity generating works' in accordance with section 2.35 of the T&I SEPP. Pursuant to the Griffith LEP, 'electricity generating works' are prohibited in land zoned RU1 Primary Production.

However, in this instance, and pursuant to Part 2.1, section 2.7(1), the T&I SEPP prevails over the Griffith LEP and accordingly allows development of a BESS with consent on land zoned RU1 Primary Production, as Part 2.3, section 2.36 of the T&I SEPP states that:

> *(1) Development for the purpose of electricity generating works may be carried out by any person with consent on the following land –*
>
> *(b) any land in a prescribed non-residential zone.*

The RU1 Primary Production is listed as a non-residential zone. As such, the Project and ancillary works including installation of a transmission line connection to the Griffith Substation is permissible with consent as an SSD.

4.2.4 Other Approvals

Under the *SSD Guidelines – Preparing an Environmental Impact Statement,* the Project must be assessed against other approvals that may be required to carry out the Project. Some of these are mandatory approvals within the EP&A Act, whilst others are contained within relevant state and federal legislation and instruments. The following Section identifies any other approvals that are required to carry out the Project, grouped into Consistent approvals, EPBC Act approval, and other approvals.

4.2.4.1 Consistent approvals

The following approvals cannot be refused if the Project is approved and must be substantially consistent with the approval.

Table 9 – Consistent approvals

Legislation	Requirement
Fisheries Management Act 1994	Under Section 144 of the Act, SSD applications must consider whether they require an aquaculture permit. As defined in the Act, aquaculture refers to: ▪ cultivating fish or marine vegetation for the purposes of harvesting the fish or marine vegetation or their progeny with a view to sale, or ▪ keeping fish or marine vegetation in a confined area for a commercial purpose (such as a fish-out pond.

Legislation	Requirement
	The Project does not intend to incur any interaction with fish or marine vegetation, and as such does not require an aquaculture permit under this Act.
Coal Mine Subsidence Compensation Act 2017	This Act outlines the compensation framework for the impacts of coal mine subsidence in NSW. Under Section 22, approval must occur for development occurring within a designated 'mine subsidence district' which is granted by the Chief Executive. No part of the Project Site falls within a Mine Subsidence District and therefore does not require approval under this Act.
Mining Act 1992	Part 5 of this Act is concerned with mining leases, which are also a mandatory consideration for approval within Section 4.42 of the EP&A Act. The Project, in all phases of its life, does not seek to mine for minerals in any capacity and as such, a mining lease is not required for the Project.
Petroleum (Onshore) Act 1991	Under Division 5 of this Act, the grant of production leases and rights of leaseholders is outlined. A production lease under this Act allows the leaseholder to: ▪ prospect in and on the land comprised in the lease for petroleum, and ▪ conduct petroleum mining operations in and on the land comprised in the lease, and ▪ construct and maintain on the land such works, buildings, plant, waterways, roads, pipelines, dams, reservoirs, tanks, pumping stations, tramways, railways, telephone lines, electric powerlines and other structures and equipment as are necessary for the full enjoyment of the lease or to fulfil the lessee's obligations under it. The Project does not seek to prospect, nor mine for petroleum across any part of the Project Site and as such, is not seeking a production lease under this Act.
Protection of the Environment Operations Act 1997	Under Section 4.42 of the EP&A Act, an SSD must consider the need for an environment protection licence. Under the *Protection of the Environment Operations Act 1997,* an environment protection licence is required: ▪ to authorise the carrying out of scheduled development work at any premises, as required under section 47, ▪ to authorise the carrying out of scheduled activities at any premises, as required under section 48, ▪ to authorise the carrying out of scheduled activities not related to premises, as required under section 49, ▪ to control the carrying out of non-scheduled activities for the purpose of regulating water pollution resulting from any such activity, as referred to in section 122. Within Schedule 1 of this Act, electricity storage is omitted as a premises-based activity that would trigger the need for an environment protection license under section 48. As such, the Project is not pursuing the grant of an environmental protection license.
Roads Act 1993	Section 138 of this Act states: A person must not (a) erect a structure or carry out a work in, on or over a public road, or (b) dig up or disturb the surface of a public road, or (c) remove or interfere with a structure, work or tree on a public road, or (d) pump water into a public road from any land adjoining the road, or (e) connect a road (whether public or private) to a classified road, otherwise than with the consent of the appropriate roads authority. Consultation has occurred across the planning phase of the Project with TfNSW. Specific briefings on the necessary works likely required by the Project on the Irrigation Way, state road MR8, have occurred. It is expected that access to Irrigation Way will be required for installation of transmission infrastructure across Irrigation Way to the Griffith Substation. If the transmission connection is made via an underground cable, there may be additional temporary disturbance to parts of the land or carriageway for the carrying out of construction.

Legislation	Requirement
	Approval may therefore be required under sections 138(1)(a) and 138(1)(b) for works in, and disturbance of, the roadway. Consent under section 138 of this Act cannot be refused if necessary for carrying out an SSD if development consent has been issued.
Pipelines Act 1967	This Act requires a party to obtain a licence where a person wishes to: ▪ commence, or continue, the construction of a pipeline, or ▪ alter or reconstruct a pipeline. Under Section 3 of this Act, a pipeline is defined as 'a pipe or system of pipes for the conveyance of any substance, whether in a gaseous, liquid or solid state'. The Project, whilst being located around a number of pipeline easements, drains and the Irrigation Way irrigation channel, will not seek to construct, alter, or reconstruct any of these existing assets. As such, a licence under this Act is not being sought by the Project.

4.2.4.2 EPBC Act approval

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is the Commonwealth Government's overarching environmental legislation providing a legal framework for protecting the Australian natural environment, its inherent biodiversity as well as naturally and culturally significant places. Its application primarily revolves around ensuring that the proposed development does not significantly impact the environment, particularly Matters of National Environmental Significance (MNES).

The Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) provides the Protected Matters Search Tool (PMST) for project proponents. This tool supports preliminary desktop assessment to evaluate the potential impacts of development on MNES within a site and its surrounding areas.

At the time of writing this EIS, an assessment of the Project Site was conducted using the PMST to gain a preliminary understanding of the Project's potential impacts on MNES. The assessment included the Project Site and an additional 10 km buffer zone. A summary of the findings is presented in Table 10.

Table 10 – EPBC Act PMST Search Summary

Matter	Comment
World Heritage Properties	No World Heritage Properties were identified in the PMST search area.
National Heritage Place	No National Heritage Places were identified in the PMST search area.
Wetlands of International Importance (RAMSAR)	4 RAMSAR listed wetlands were identified in the PMST report area.
Listed Threatened Ecological Communities	One listed TEC was found to be likely to occur within the Project site: ▪ Grey Box (Eucalyptus microcarpa) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia (*Endangered)* Three listed TEC were found to maybe occur within the Project site: ▪ Weeping Myall Woodlands *(Endangered)* ▪ Poplar Box Grassy Woodland on Alluvial Plains *(Endangered)* ▪ White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland *(Critically Endangered)* One listed TEC was found to potentially occur within the 10km buffer area: ▪ Buloke Woodlands of the Riverina and Murray-Darling Depression Bioregions *(Endangered).*
Listed Threatened Species	A total of 37 threatened species or species habitat were noted to occur within the PMST report area.

Matter	Comment
List Migratory Species	A total of 8 listed migratory species or species habitat were noted to occur within the PMST report area.

A detailed assessment of the Project's potential impact on MNES by a qualified ecologist will be undertaken to inform whether a referral under the EPBC Act to the Minister for the Environment is warranted and will inform a pre-referral meeting. The Minister will determine if the Project will be considered a controlled action and whether it requires formal assessment and approval under the EPBC Act.

4.2.4.3 Native Title Act 1993

The *Native Title Act 1993* (Commonwealth) provides a legislative framework to provide a national system for the recognition and protection of Aboriginal land rights, tenure and land sovereignty and for coexistence with the national land management system. The *Native Title Act 1993* sets up processes to determine where native title exists, how future activity impacting upon native title may be undertaken and to provide compensation where native title is impaired.

A search of the National Native Title Register and National Native Title Tribunal Spatial Data identified three unsuccessful native title determinations undertaken by the Griffith LALC over the 2017-2023 period. These occurred on land parcels within the Griffith town centre. There are no current or previous Native Title determinations that have occurred in Yoogali and therefore, the Project Site.

4.2.4.4 Heavy Vehicle National Law

As large, long structures, approval will be required for the transportation of some of the electrical infrastructure components (for example, transformers). A maximum of five OSOM vehicle deliveries will occur over the course of the construction of the Project. An OSOM route assessment has been conducted in the Traffic Impact Assessment (Appendix K) with some further investigation required to identify most appropriate route from the Port to the Project Site and identify any required road upgrades.

4.2.4.5 Other State Legislation and Instruments

A number of other pieces of state level legislation and instruments are applicable to the Project (refer to Table 11 and Table 12). These have been extracted from the SEARs awarded to the Project, as well as other instruments that a relevant to the nature of the Project.

Table 11 – Relevant NSW legislation

Legislation	Requirement
Biodiversity Conservation Act 2016	This Act aims to conserve threatened species, populations and ecological communities through ensuring appropriate assessment, management and regulation of actions that may damage critical or other habitat for a listed threatened species, or may otherwise significantly affect a threatened species, population or ecological community. Given the highly modified nature of the Development Area, and no proposed native vegetation removal, the Project is not likely to have a significant impact on biodiversity values, in particular threatened species and ecological communities listed under the BC Act (Appendix F).
Biosecurity Act 2015	Under this Act, all plants are regulated with a general biosecurity duty to prevent, eliminate or minimise any biosecurity risk they may pose. Section 22 requires that any person who deals with any plant, who knows (or ought to know) of any biosecurity risk, has a duty to ensure the risk is prevented, eliminated or minimised, so far as is reasonably practicable. Measures to prevent, eliminate or minimise any biosecurity risk are discussed in Section 6.3 and Appendix N.
Contaminated Land Management Act 1997	This Act outlines the circumstances in which notification of the NSW Environment Protection Authority (EPA) is required in relation to the contamination of land. Following a Soil Assessment (Appendix O), the Development Area has been found to be clear of contaminants that would endanger humans as well as the BESS itself in the construction and operation phases.

Legislation	Requirement
Crown Land Management Act 2016	This Act provides for the administration and management of Crown lands in NSW. Crown land may not be occupied, used, sold, leased, licensed, dedicated, reserved or otherwise dealt with unless authorised by the Act. There are no areas of Crown land and travelling stock reserves/routes within the Project Site and should any work be proposed in a new area of Crown Land at a later time, approval would be sought from NSW Crown Lands.
Native Title (New South Wales) Act 1974	This Act provides for native title in relation to land or waters. The Project does not affect land subject to a native title claim or determination, or land to which an Indigenous Land Use Agreement applies.
Waste Avoidance and Resource Recovery Act 2001	This Act encourages the most efficient use of resources in order to reduce environmental harm. The waste and resource impacts of the Project have been assessed in Waste Management Plan (Appendix L). The Waste Management Plan recommends measures to reduce and avoid waste generation in compliance with this Act and relevant regulations including the SafeWork NSW – Codes of Practice.

Table 12 – Relevant planning instruments

Planning Instrument	Relevant Consideration(s)
Transport and Infrastructure SEPP	Under Division 4, Section 2.36(1) of the T&I SEPP, development for the purpose of electricity generating works (the Project), may be carried out by any person with consent on the following land: a) … any land in a prescribed non-residential zone The Project will be sited on land Zoned RU1 – Primary Production under the LEP, a prescribed non-residential zone, and therefore is permissible with consent.
State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP) (formerly State Environmental Planning Policy No. 33 – Hazardous and Offensive Development)	Section 3 of the Resilience and Hazards SEPP aims to: *a) Ensure that any measures proposed to be employed to reduce the impacts of a potentially hazardous or dangerous industry development are taken into account* *b) Ensure that the consent authority has sufficient information to assess whether the development is hazardous or offensive and to impose conditions to reduce or minimise any adverse impact* In accordance with Section 3.7 of the Resilience and Hazards SEPP, consideration will be given to current guidelines published by the DPHI regarding hazardous or offensive development. Section 4 of the Resilience and Hazards SEPP provides a state-wide planning approach to the remediation of contaminated land. Under Section 4.6(1), a consent authority is required to consider whether a proposed development site is contaminated before granting consent. Following a soil survey (detailed in Appendix O), the Development Area has been found to be clear of contaminants that would endanger humans as well as the BESS itself in the construction and operation phases. As such, remediation of the land, under this SEPP, is not required for the Project.
Griffith LEP	The Project EIS will directly address relevant components of the Griffith LEP, including: Section 1.2 – Aims of Plan: – To minimise land use conflict in general by creating areas of transition between different and potentially conflicting land uses, – To provide a variety of development options to meet the needs of the community with regard to housing, employment and services, – To manage and protect areas of environmental significance. Objectives and permissible uses of the RU1 – Primary Production Zone. The objectives of the RU1 Zone include: ▪ To encourage sustainable primary industry production by maintaining and enhancing the natural resource base. ▪ To encourage diversity in primary industry enterprises and systems appropriate for the area. ▪ To minimise the fragmentation and alienation of resource lands. ▪ To minimise conflict between land uses within this zone and land uses within adjoining zones.

Planning Instrument	Relevant Consideration(s)
	▪ To permit a range of activities that support the agricultural industries being conducted on the land and limit development that may reduce the agricultural production potential of the land. Clause 7.10 – Essential services: Development consent must not be granted to development unless the consent authority is satisfied that any of the following services that are essential for the development are available or that adequate arrangements have been made to make them available when required— (a) the supply of water, (b) the supply of electricity, (c) the disposal and management of sewage, (d) stormwater drainage or on-site conservation, (e) suitable vehicular access.

4.2.4.6 Approvals required if not an SSD project

Under the SSD Guidelines – Appendix B, *State significant development guidelines – preparing an environmental impact statement,* this report must consider approvals that would have been required if the project was not an SSD project.

Section 4.41 of the EP&A Act exempts the following additional approvals for an approved SSD. These include:

- An excavation permit under section 139 of the *Heritage Act 1997*
- A permit under section 201,205, or 2019 of the *Fisheries Management Act 1994*
- An Aboriginal heritage impact permit under section 90 of the *National Parks and Wildlife Act 1979*
- A bushfire safety authority under section 100B of the *Rural Fires Act 1997*
- A water use approval under section 89, a water management work approval under section 90 or an activity approval under section 91 of the *Water Management Act 2000*

Assessment and consideration against each of these approvals is contained within Table 13.

Table 13 – Section 4.41 Approvals which are not required

Legislation	Requirement
Fisheries Management Act 1994	Section 4.41 of the EP&A Act specifies that consideration must occur for the Project under sections 201, 205, and 219 of the *Fisheries Management Act 1994*. These sections correspond to the following actions as prohibited without a permit: ▪ Dredging or reclamation (section 201) ▪ Harm of marine vegetation (section 205) ▪ Blocking the passage of fish (section 219). The Project does not intend to harm, alter, or block marine vegetation or fish. The Project Site does not contain any marine vegetation nor fish and as such, the Project would not require a licence under this Act.
Heritage Act 1977	Section 4.41 of the EP&A Act specifies that consideration must occur for the Project under Part 4 or section 139 of the *Heritage Act 1977*. These sections relate to the approvals required to undertake the following: ▪ Disturb, demolish, move, alter or incur damage where an interim heritage order or listing on the State Heritage Register applies to a place, building, work, relic, moveable object, precinct, or land (Part 4). ▪ Excavate any land knowing or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed (Section 139). Across the Project Site, there is no place, building, work, relic, moveable object, precinct, or land that is under an interim heritage order, nor on the State Heritage Register. Excavation is planned

Legislation	Requirement
	across the Development Area with no reasonable cause that a relic may be encountered. As such, the Project would not require approvals under these two components of this Act.
National Parks and Wildlife Act 1974	Section 4.41 of the EP&A Act specifies that consideration must occur for the Project under section 90 of the *National Parks and Wildlife Act 1974*. This section relates to Aboriginal heritage impact permits. An Aboriginal heritage impact permit is required where development activity intends to disturb and potentially destroy a known Aboriginal place or object. The Project Site does not contain any identified Aboriginal heritage sites or items and an Aboriginal heritage impact permit is subsequently not sought. Nevertheless, an Aboriginal cultural heritage assessment report (ACHAR) in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW, 2010) and Part 6 of the *National Parks and Wildlife Act 1974* has been prepared for this Project. The outcomes of the ACHAR are discussed in Section 6.2 and Appendix G.
Rural Fires Act 1997	Section 4.41 of the EP&A Act specifies that consideration must occur for the Project under section 100B of *Rural Fires Act 1997*. This section relates to a bush fire safety authority. A bushfire safety authority is required where development for a designated 'special fire protection purpose' under section 100B(6), is intended to occur on bush fire prone land. The Project does not satisfy any prescribed definitions of a special fire protection purpose and a bush fire safety authority is not required.
Water Management Act 2000	Section 4.41 of the EP&A Act specifies that consideration must occur for the Project under sections 89, 90 and 91 of the *Water Management Act 2000*. These sections relate to the approvals required to undertake the following: ▪ Water use for a particular purpose (section 89) ▪ Water supply, drainage, and/or flood work (section 90) ▪ Controlled activity and/or aquifer interference (section 91). The Project does not impede upon any waterways or require use of water from a water source covered under this Act. Therefore, approval under any of these sections of this Act would not be required.

4.2.5 Preconditions to exercising the power to grant consent

There are no pre-conditions to exercise the power to grant approval that haven been identified for the Project.

Table 14 – Preconditions to grant consent

Statutory Reference	Comment	Section / Appendix
EP&A Regulation 2021	Section 190 of the EP&A Regulation specifies the form required of the EIS that is required to accompany an application for SSD. Section 192 of the EP&A Regulations specifies mandatory content of an EIS. This EIS has been prepared in accordance with this regulation and includes the form specified under section 190 as an appendix.	Appendix C
T&I SEPP Section 2.119	Section 2.119 of this SEPP details the requirements for consideration prior to approval where a development has a frontage to a classified road. The aim of this provision is to ensure that new development does not impede upon the classified road, and vice versa. The consent authority must consider the proposed access to the development, with preference for it to be not on the classified roads, as well as the impact that the classified road will have on the development. The Project Site has a frontage to Irrigation Way, which is gazetted as Road Number 80 within the *Roads Act 1993*. However, all site access (primary, secondary, emergency) will be facilitated on Bob Irvin Road, a local road along the western edge of the BESS Area. Due to the industrial nature of the development, it is not sensitive to the noise and emissions from the road. Additionally, it is not expected to emit smoke nor dust in a manner that will impede the function of Irrigation Way.	Included in EIS submission
T&I SEPP Section 2.48	Section 2.48 of the SEPP details that consent is required for development to be carried out: ▪ *(i) within or immediately adjacent to an easement for electricity purposes (whether or not the electricity infrastructure exists), or* ▪ *(ii) immediately adjacent to an electricity substation, or* ▪ *(iii) within 5m of an exposed overhead electricity power line.*	Included in EIS submission

Statutory Reference	Comment	Section / Appendix
	In order to receive consent for this portion of works associated with the Project at the Griffith Substation and around the existing 132 kV Yanco to Griffith line, TransGrid will receive written notice of the proposed works. Received comments in relation to the planned works are to be considered by the consenting authority prior to granting consent.	
Resilience and Hazards SEPP 2021	The Resilience and Hazards SEPP outlines the mandatory consideration of contamination and the need for remediation in the determination of a development application (section 4.6). As a part of the EIS process, a Preliminary Site Investigation and Soil Assessment has been undertaken with findings confirming that the land is not contaminated, and as such, development on the Project Site may proceed under this SEPP.	Appendix O Section 6.7
Biodiversity Conservation Act 2016	Under Section 7.9 of the Biodiversity Conservation Act 2016, an application for SSD is to be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. The Project has chosen the route of a BDAR Waiver, cognisant of the low biodiversity value of the Project Site, and thus minimal vegetation impact from development and operation.	Appendix F Section 6.1
Griffith LEP 2014 Section 7.1	Under section 7.1 of the Griffith LEP, earthworks as a part of development must be considered for their impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land. This impact must be considered by the consent authority prior to granting consent. For the Project, the earthworks relevant to this section of the Griffith LEP involve; the construction of the BESS and associated infrastructure, the installation of a transmission line between the Project and the Griffith Substation, and earthworks at the Griffith Substation to connect the new 132 kV cable into a bay of the substation. The potential impact to cultural or heritage items has been considered in the ACHAR.	Appendix G Section 6.2
Griffith LEP 2014 Section 7.3	The level at which terrestrial biodiversity (section 7.3) will be threatened, impacted, or damaged by the development is also considered under this LEP. Prior to granting approval, a consent authority must be assured of avoidance or mitigation of impact. The Project is not anticipated to impact biodiversity values due to the site being highly disturbed.	Appendix F Section 6.1

4.2.6 Mandatory matters for consideration

The following table identifies matters that the consent authority is required to consider in deciding whether to grant approval.

Table 15 – Mandatory considerations table

Section 1.3 of the EP&A Act	
Object	**Response**
▪ To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources.	▪ The project provides necessary grid firming services and will otherwise support the penetration of renewable energy sources in NSW. ▪ Technical specialists have been engaged to assess and report on the potential for the project to impact upon the natural and other resources of the state and local areas. ▪ The impacts have been summarised in Section 6
▪ To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment.	▪ Ecologically sustainable development is considered in Section 7.6.

▪ To promote the orderly and economic use and development of land.	▪ The orderly and economic use of land is best served by development that is permissible under the relevant planning regime and predominately in accordance with the prevailing planning controls. ▪ The project comprises a permissible development, which is consistent with the statutory and strategic planning controls and is in close proximity to similar land uses including the Griffith substation and surrounding transmission lines. ▪ As detailed in this EIS, the project will result in positive economic impacts, with appropriate mitigation measures and management strategies being proposed to reduce any adverse environmental and social impacts.
▪ To protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats.	▪ Impacts to the environment have been avoided and minimised through careful site selection, following the key strategies outlined in Section 1.3.1.
▪ To provide increased opportunity for community participation in environmental planning and assessment.	▪ As described in Section 5 of this EIS, there have been a range of engagement activities to inform the community about the project and to seek community (and other stakeholders) feedback. ▪ This EIS provides further detailed information regarding the project and its potential impacts. It will be placed on public exhibition by DPHI, and community members will be able to make formal submissions. ▪ A report will be prepared responding to these submissions.

Section 4.15 of the EP&A Act

Consideration	Response
(a) The provisions of - (i) Any environmental planning instrument.	▪ See Section 4 and Table 15
(ii)Any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved).	▪ At the time of preparing this EIS, there were no known proposed environmental planning instruments that are relevant to the application.
(iii) Any development control plan.	▪ Pursuant to Clause 2.10 of the Planning Systems SEPP, development control plans do not apply to SSD projects. As such, the Griffith Development Control Plan No. 3 – Industrial Development, is not to be considered.
(iiia) Any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4.	▪ There are no relevant planning agreements that have been entered into by the Proponent with a planning authority (or 2 or more planning authorities) that pertain to the Project.
(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph).	▪ This EIS has been prepared in accordance with the requirements of the EP&A Regulation.
(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	▪ A detailed assessment has been undertaken with respect to the Project's environmental social and economic impacts in Section 6 and the relevant appendices.
(c) the suitability of the site for the development.	▪ The site is considered suitable for the Project as outlined in Section 7.1 of this EIS.
(d) any submissions made in accordance with this Act or the regulations.	▪ Submissions on the EIS received during the public exhibition period will be addressed. ▪ Consultation informing the EIS has been undertaken with the community and other stakeholders (see Section 5).

(e) The public interest.	▪ The approval of the Project is considered to be in the public interest for the reasons outlined in Section 7.3

Environmental planning instrument (EPI)	
Instrument	**Response**
Planning Systems SEPP	▪ The Planning Systems SEPP identifies development that is significant to the state of NSW. ▪ A development application is declared to be SSD if the development is not permissible without development consent under Part 4 of the EPA Act, and the development is specified in Schedule 1. ▪ The Project is declared to be SSD as electricity generating works are not permissible without development consent, and the Project is specific in Schedule 1 for the purposes of electricity generating works with a capital investment of greater than $30 million. ▪ Under Section 2.10, development control plans (whether made before or after the commencement of this Policy) do not apply to SSD.
T&I SEPP	▪ Section 2.48 of the T&I SEPP requires that development within or adjacent to an electricity easement or adjacent to a substation be referred to the relevant electricity supply authority. ▪ There is a transmission line easement within the site. As such, the application must be referred to the electricity supply authority. ▪ The transmission line through the Project Site, as well as the Griffith Substation where the Project intends to connect to, are owned and managed by Transgrid. They have been engaged across the design process and the Project will ultimately be formally referred to Transgrid for comment which must be considered by DPHI in the final determination.
Resilience and Hazards SEPP	▪ Pursuant to Section 3.11, a preliminary hazard analysis (PHA) has been prepared for the Project in accordance with current guidelines (Appendix P). ▪ Under Section 3.12, the consent authority must consider the PHA.
Griffith LEP	▪ Pursuant to Section 2.3 (2) the consent authority must have regard to the objectives for development in a zone when determining a development application. ▪ The objectives of the RU1 – Primary Production Zone are: – To encourage sustainable primary industry production by maintaining and enhancing the natural resource base. – To encourage diversity in primary industry enterprises and systems appropriate for the area. – To minimise the fragmentation and alienation of resource lands. – To minimise conflict between land uses within this zone and land uses within adjoining zones. – To permit a range of activities that support the agricultural industries being conducted on the land and limit development that may reduce the agricultural production potential of the land. – To permit tourist facilities that promote an appreciation of the rural environment and associated agricultural and horticultural activities, while ensuring the continued economic viability of the land. The Project is compatible with the zone objectives on the basis that it is utilising a site that has been cleared and not farmed for extended periods. It also seeks to develop land that has already been assessed and approved for use for electricity infrastructure by Griffith City Council (Yoogali Solar Farm). This maintains the level of active agricultural land across the region.
Griffith LEP Section 7.1 (Earthworks)	▪ Before granting development consent for earthworks (or for development involving ancillary earthworks), the consent authority must consider the following matters— – the likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development, – the effect of the development on the likely future use or redevelopment of the land, – the quality of the fill or the soil to be excavated, or both, – the effect of the development on the existing and likely amenity of adjoining properties, – the source of any fill material and the destination of any excavated material, – the likelihood of disturbing relics, – the proximity to, and potential for adverse impacts on, any waterway, drinking water catchment or environmentally sensitive area,

	– any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development. ▪ The Project will restrict developed outflows to pre-development rates for the 1% AEP and appropriately manage generated runoff via an on-site detention basin to avoid detrimental effects on drainage patterns. ▪ The Project's design and installation is considerate of the soil conditions and will implement the mitigation measures outlined in the Preliminary Site Investigation and Contamination Assessment (Appendix G).
Griffith Section 94a Development Contributions Plan 2010	▪ Part C.4 Land to which this Plan applies – This Plan applies to the entirety of the Griffith LGA, including the Project Site area, as Yoogali falls within Griffith City. ▪ Part C.7 How does this Plan operate? – The Plan specifies that it applies where Council is the determining authority for a particular development application. Considering the Project is a State Significant Development (SSD), under Part 4.5(a) of the EP&A Act, the Minister for Planning and Public Spaces is the consent/determining authority. As such, the Project is not required to pay Development Contributions under this Plan to Griffith City LGA. ▪ Reflected in previous SSD determinations near the Project (SSD7482 + SSD6604), it has been upheld by DPHI that considering the impact and use of electricity generating installations on local government services and infrastructure, there is no merit in applying the Plan and charging the levy to such projects.

5. Engagement

The Proponent is committed to ongoing delivery of best-practice engagement, with the overarching objective of ensuring that the identified community and stakeholder groups are proactively and meaningfully informed, consulted and involved and that the benefits of the project are genuinely felt by the local community. Furthermore, the Proponent pledges to treat members of the local community and other stakeholders fairly, courteously, consistently and ethically.

Thus far, engagement has been carried out with the Griffith community, neighbours of the project site in the suburb of Yoogali, key state and federal government agencies, and local community organisations with particular emphasis on community benefit sharing ideation. These stakeholders were identified during the Scoping phase of the project via the development and implementation of the Community and Stakeholder Engagement Plan (CSEP), elaborated on in Section 5.3. The feedback received during this engagement phase informed the Project design, layout and preparation of this EIS, details of which are noted in Section 5.5.

This section explains how the EIS meets the SEARs requirements, including engagement obligations, during its preparation. In accordance with the Project-specific SEARs, the EIS requirements are listed in Table 16.

Table 16 – Engagement SEARs requirements

Engagement requirement	Relevant Section
Engagement A model for community benefit-sharing, prepared in accordance with the Benefit-Sharing Guideline, including the terms of any proposed voluntary planning agreement with the relevant local council	Section 5.8
detail how engagement undertaken was consistent with the Undertaking Engagement Guidelines for State Significant Projects (DPHI, 2024)	Section 5.3, 5.4, 5.5
describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, an explanation should be provided.	Section 5.3, 5.4, 5.5
Consult with the relevant local, State or Commonwealth Government authorities, infrastructure and service providers, community groups, affected landowners and any exploration licence and/or mineral title holders.	Section 5.3, 5.4, 5.5
Undertake detailed consultation with affected landowners surrounding the development, the owners of all exploration licences across the proposed development site, the operator of any pipelines on or adjacent to the site, and all relevant government agencies, including the relevant local Council.	Section 5.3, 5.5

5.1 Objectives and approach

A CSEP was prepared at commencement of the Project to outline principles, objectives and an action plan to guide engagement through all phases of the Project. The CSEP includes social demographic analysis, stakeholder identification, engagement risk analysis and mitigation, and key messaging.

Development of the CSEP was informed by the following guidelines and sought to meet, or exceed, performance requirements within these guidelines:

- Undertaking Engagement Guideline for State Significant Projects – DPHI, 2024
- Benefit-Sharing Guideline – DPHI, 2024
- Public Participation Spectrum – Engagement Institute (formerly International Association of Public Participation), 2018
- Best Practice Charter for Renewable Energy Projects – Clean Energy Council, 2021
- Leading Practice Principles: First Nations and Renewable Energy Projects – Clean Energy Council, 2024.

The engagement approach developed in the CSEP highlights the importance of early and proactive engagement, building trusted relationships, partnering with key community stakeholders, and enabling open and transparent discussion about the Project. It aligns with local engagement and benefit principles, as

identified in the *Undertaking Engagement Guideline for State Significant Projects* (DPHI, 2024), that provides a framework for community engagement in the context of SSD.

Based on those guidelines, five key community engagement objectives were articulated:

1. Ensure transparent and accessible communication of Project information to the community.
2. Engage a diverse range of stakeholders to gather input and address concerns.
3. Proactively address and mitigate potential negative impacts while maximising positive Project outcomes.
4. Respect and incorporate Indigenous perspectives, cultural heritage, and knowledge into the Project.
5. Establish a flexible engagement strategy that can adapt to changing circumstances and address emerging issues.

5.2 Engagement tools

To support the engagement approach, a range of tools were used for the engagement activities carried out. Communication materials were produced to be objective, balanced and relay Project information in an effective manner, free from technical jargon. Stakeholder and community feedback was recorded and used to inform design and planning of the Proposal (see Section 2.5).

The communication tools and activities were designed to ensure that the Griffith community and stakeholders are effectively informed, consulted and involved in the Project, to reduce to the extent possible:

- The risk of conflict between community, stakeholders, and the Project
- Any intrusion and disruption to businesses and land uses
- Concerns around consultation fatigue
- Cumulative impacts of development.

The following table lists the engagement tools and activities used across the Project lifecycle.

Table 17 – Communication and engagement tools and techniques

Tool	Description and purpose	Stakeholders	Level of engagement
Presentation and briefing pack	To provide clear and concise information about the project as it develops. To notify the stakeholders about key milestones in the project and how to influence the planning and design. To avoid the spread of misinformation and to mitigate concerns, where possible.	All stakeholders	Inform | Consult |
Introductory door knocking letter	To introduce Eku Energy and the Project. To inform about dates, times and process of the door knock, and how to contact the Project team.	Neighbouring landowners	Inform | Consult
Letter of introduction	Direct letters delivered to households within a ~2km the Project (to be agreed with client/project team), details of upcoming events (such as Community Drop In Sessions), participation opportunities, and project updates. To inform stakeholders of upcoming studies and assessment activities that may be relevant to their property to provide detailed information about the work and consultant details.	Neighbouring landowners Local businesses	Inform | Consult

Tool	Description and purpose	Stakeholders	Level of engagement
Door knocking	Engagement teams go door-to-door to liaise with all dwellings and landowners within ~2km of the Project. To provide an opportunity for the project team to meet neighbouring landowners face-to-face. To inform neighbouring landowners about the Project, process, and upcoming community information sessions.	Neighbouring landowners	Inform | Consult
Face to face and online stakeholder meetings/ interviews	To establish rapport and insulate ongoing relationships with primary stakeholders and key neighbours. To inform, consult or involve interested and concerned local community members and stakeholder groups. To identify potential risks and issues associated with the Project's construction or operation. To mitigate negative issues or spreading of misinformation. To provide a direct feedback mechanism.	State and Local government Community groups Neighbouring landowners	Inform | Consult | Involve
Contact phone and email address	To establish a point of contact via email and phone to stakeholders wanting to learn more about the Project, voice their concerns or raise matters of interest during all phases. To allow for initial introductions and quick responses to community members and stakeholders regarding the Project, leading to possible further engagement via the range of other tools/methods. To be widely distributed through external communication and media.	All stakeholders	Inform | Consult
Project website/ webpage	To provide clear and user-friendly information about the Proponent, team, and the Project itself. To be updated regularly as the Project develops to address concerns and mitigate the spread of misinformation. To provide a central location for all technical documents relating to the Project, regularly uploaded with up-to-date information. The website can be found at: https://www.ekuenergy.com/aus/projects/griffith-bess	All stakeholders	Inform | Consult
Surveys & polls (Feedback submission, and Community benefit & supplier registrations)	To provide a platform to receive structured responses on specific issues to obtain quantitative measurable results that can be reported on monthly throughout the Project lifecycle. Made available through both digital and print media.	All stakeholders	Inform | Consult
Fact sheets and information posters	To provide clear and concise information about the Project as it develops. To be written in plain English to translate complex project information, and incorporating the use of	All stakeholders	Inform

Tool	Description and purpose	Stakeholders	Level of engagement
	visual tools like videos, graphics and iconography where possible. To notify the community about key milestones in the Project and how to get involved, and to avoid the spread of misinformation and to mitigate concerns where possible.		
Media release	To ensure members of the local and wider community are advised about the Project status, project milestones and lodgement details through publications in local and regional media outlets. To engage a wide audience through publications in local, regional, and state media outlets.	Local media State media	Inform
Local advertising	To promote the community information session and project information in the local radio, newspaper and online.	Local media	Inform
Community drop-in sessions	To facilitate strong face to face interactions between the project team (including the Proponent and key technical consultants) and the community / stakeholders. To be informed about the Project and consult the project team and government representatives at critical stages of the process. To provide Project information through mixed visual media, to assist the community / stakeholders in better understanding the Project. To provide an opportunity for community members to clarify information, voice their ideas and concerns, encourage engagement in the planning process and to establish a point of contact for the Project.	Nearby landowners Local community members Griffith City Council community Local businesses Local politicians	Inform | Consult
Community Benefit Sharing Afternoon Tea	To provide a specific time and place to have conversations with local not-for-profits about funding that the project can provide, should it be approved. Focused less on technical and planning elements of the Project and more on understanding community needs and building local relationships that can lead to improving social value from the Project.	Targeted local stakeholders	Inform | Consult
Coffee Catch Up	To provide an informal means of engaging with the project team in a regularly frequented local café. Project collateral to be kept to a minimum and the project team to hand out fact sheets. Informal meetings also to take place with regional authority representatives.	All stakeholders	Inform | Consult
Thank you email	To facilitate strong face to face interactions between the project team (including the Proponent and key technical consultants) and the community / stakeholders. To be informed about the Project and consult the project team and government representatives at a critical stage of the process (i.e. pre-lodgement of the	All stakeholders	Inform | Consult

Tool	Description and purpose	Stakeholders	Level of engagement
	planning application and during the public advertising period). To provide project information through mixed visual media, to assist the community / stakeholders in better understanding the Project. To provide an opportunity for community members to clarify information, voice their ideas and concerns, encourage engagement in the planning process and to establish a point of contact for the Project.		

5.3 Stakeholder identification

Stakeholders are defined as people, groups, organisations and communities that may be directly or indirectly *impacted* by the Project, hold a strong *interest* or have an *influence* on the Project and its outcomes. These stakeholders were initially mapped during the Scoping Phase, through the development of the CSEP.

The stakeholders detailed in this section will likely evolve over time and comprise of locally affected individuals, the organisations that represent them in a formal or informal capacity, national or state government authorities, political representatives, and Traditional Owners or their formal representatives.

The key stakeholders identified for the Project are provided in Table 18.

Table 18 – Key stakeholders

Stakeholder Group	Description
Near neighbours (affected localities)	▪ Landowners bordering the Project site: – Adjacent – Near (within 2-3km radius from site boundary) ▪ Wider Griffith and Yoogali Communities
Businesses and business associations	▪ Business within the Griffith City Council Area ▪ Griffith Business Chamber ▪ Wamara (construction) ▪ One Basin CRC ▪ Charles Sturt University ▪ Western Riverina Community College ▪ Country University Centre Health Hub ▪ Enterprise Plus
Traditional owners, Indigenous communities, heritage representatives	▪ Griffith Local Aboriginal Land Council ▪ NSW Environment and Heritage
Government bodies, regulators	▪ Griffith City Council councillors, General Manager, Economic Development Coordinator and Community Development Coordinator Also including but not limited to: ▪ Department of Planning, Housing and Infrastructure ▪ Scheme Financial Vehicle ▪ NSW Climate and Energy Action ▪ Department of Climate Change, Energy, the Environment and Water ▪ Minister for Planning and Public Spaces ▪ Fire Rescue NSW ▪ Department of Industry – Lands and Waters ▪ UGL Regional Linx ▪ Department of Primary Industries and Regional Development ▪ Cwlth Department of Climate Change, Energy and the Environment ▪ Aus Industry / Cwlth Department of Industry Science and Resources
Relevant local members	▪ Electorate of Farrer (Federal) – Sussan Ley MP ▪ Electoral district of Murray (State) – Helen Dalton MP

Stakeholder Group	Description
Regulators and authorities	▪ Environment Protection Authority ▪ NSW Rural Fire Service ▪ Transgrid ▪ Australian Energy Market Operator ▪ EnergyCo ▪ Transport for NSW ▪ Regional Development Australia Riverina Emergency services: ▪ NSW Rural Fire Services (RFS) ▪ State Emergency Services (SES) ▪ Rural Fire Service – Griffith Brigade
Community / interest groups	▪ Griffith Rotary Club ▪ Intereach ▪ Grown Our Own ▪ Soroptimist International ▪ Griffith Progress Association ▪ Yoogali Progress Association
Utility/asset managers	▪ Transgrid (electricity transmission network) ▪ Essential Energy (electricity distribution network) ▪ Murrumbidgee Irrigation (irrigation water supplier) ▪ APA (gas transmission network)
Local media	▪ The Riverine Grazier ▪ Region Riverina ▪ The Daily Advertiser ▪ ABC Riverina ▪ Southern Riverina News ▪ The Area News ▪ Southern Cross Austereo ▪ WIN TV/News

5.4 Engagement to date

Engagement with the community and key stakeholders commenced in September 2024 as part of the pre-Scoping phase of the Project. Feedback collected during initial consultation activities has been used to inform the design of the Project to minimise impacts where possible, such as noise and traffic impacts from construction and operation.

Following the lodgement of the Scoping Report and the receipt of SEARs, engagement has continued with the community and key stakeholders regarding the final designs, and the model for delivering social and economic value between the Proponent, Griffith City Council and the community.

The following table provides an overview of key engagement activities carried out with the community and stakeholders until the EIS submission, including feedback received. It should be noted that additional communication, including email correspondence, has been carried out variously across the life of the Project but has not been included in each instance for brevity and confidentiality.

Table 19 – Key stakeholders

Stakeholder	Date	Tools	Key details
Neighbours and local community	January 2025	**Mailout**	▪ Mailout conducted for properties within 2km radius ▪ Consisted of flyer and render of the proposed project, offering to arrange a meeting to brief neighbours on the project drop-in session.
	20 January 2025	**Advertising**	▪ Advertising of the upcoming Community Drop-In Session via: – the Proponent's website – *Win News* advertisement – *The Area News* print advertisement.

Stakeholder	Date	Tools	Key details
	30 January 2025	**Community Drop-In Session**	▪ Held at Griffith Senior Citizens Hall ▪ Supported by communication materials including advertisement, stakeholder invitation email and project information boards ▪ 2 community members attended the session.
	16 April 2025	**Mailout**	▪ Mailout conducted for properties within a 2km radius ▪ Consisted of letter and project overview flyer, further detailing upcoming consultation activities.
	30 April 2025	**Doorknock**	▪ Door knocking conducted to properties within 2km of the site, 39 overall dwellings visited ▪ 22 residents were absent, 14 discussions were had. For those that were absent, a 'sorry, we missed you' card was left behind with the contact details of the team ▪ Neighbour discussions provided feedback and local insight, particularly regarding flood management ▪ Concerns were raised around road condition, fire, noise, lighting and radiation ▪ Local RFS member was consulted and was not concerned about the Project.
	14 May 2025	**Community Benefit Sharing Afternoon Tea**	▪ The Afternoon Tea at Griffith Exies Club was attended by 6 local representatives, all of whom shared contact details and took materials to distribute within their local networks ▪ The event provided a forum for local not-for-profits, social enterprises, and community groups to meet the project team, learn about the proposal, and discuss the proposed community benefit sharing scheme ▪ Questions raised included fire management and flammability, the effect of the BESS on local solar generation, and broader issues of social equity and local benefit ▪ Attendees suggested practical opportunities for community benefit sharing, and noted positive reception to the proactive approach compared with other energy projects ▪ Feedback emphasised that the wider community responds to personal engagement initiatives and word-of-mouth communication, with more participation expected as locals share information and see the Project team regularly visit the community.
	15 May 2025	**Community Drop-In Session**	▪ Session was hosted at Griffith Library and 11 people attended, including community members, local representatives and council members ▪ Event was promoted through print media via *The Area News*, and targeted emails to stakeholders, with invitations extended to wider networks and follow-up engagement opportunities. ▪ Materials provided included factsheets and display boards ▪ Questions were raised around fire management, technology impacts, noise, decommissioning, supply chain ethics, local property values and capability of local first responders ▪ Benefit sharing suggestions included grants and scholarships to local students, support for community health and rehabilitation initiatives, youth engagement programs and sponsorship of local events. ▪ Feedback reflected both support and opposition: some attendees expressed concerns about visual impact, battery recycling, and trust in renewable projects, while others welcomed proactive engagement and identified opportunities for local benefit sharing and skills development.
	16 May 2025	**Coffee Catch Up**	▪ Hosted at local café Limone, providing informal opportunity for locals to meet the Project team. ▪ 9 people spoke to the Project team during the event ▪ Conversations covered community concerns such as thermal runway and fire safety protocols, RFS response capability, noise, decommissioning, and local road impacts during harvest season

Stakeholder	Date	Tools	Key details
			▪ Benefit sharing ideas included funding an outdoor cinema screen, scholarships and placement support for students, youth engagement initiatives, a roller disco, and a music festival incorporating local cultural skills. ▪ Research and education stakeholders identified partnership opportunities and supported benefit sharing through training and scholarships.
	16 July 2025	**Mailout**	▪ Mailout conducted to houses within 2km radius consisting of SEARs update newsletter ▪ 39 of 53 letters were marked Return to Sender, with no consistency against letters delivered in the April mailout ▪ The Proponent via the Applicant, engaged with Australia Post to resolve the Return to Sender issue without a successful outcome. ▪ Following this, the Project landowner consulted the local Griffith Post Office who marked the address list on file with corresponding PO Box numbers.
	5 August 2025	**Mailout**	▪ Mailout conducted to houses within a 2km radius ▪ Consisted of SEARs update newsletter *(to addresses that had not received them previously due to being marked Return to Sender),* and upcoming engagement opportunities ▪ Letters marked Return to Sender were hand delivered by the Project team when they were in Griffith to host the Community Drop-In Session.
	20 August 2025	**Community Drop-In Session**	▪ CDIS was hosted at Griffith Library and 11 people attended, including local contractors, neighbours and community members ▪ Concerns and questions around BESS operations, fire risk, noise mitigation, removal of agricultural lands and energy supply reliability were brought up ▪ Contractors expressed interest in supplying services during construction and requested capability statements, and regular Project updates ▪ Community members highlighted social needs that could use funding, including transport for ageing residents and increasing accessibility for people with disabilities ▪ Actions from the session included sharing capability statements with contractors, coordinating project updates, investigating the funding of an outdoor screen, community benefit initiatives, and ongoing follow-up with stakeholders.
	21 August 2025	**Coffee Meet and Greet**	▪ Hosted at local café Limone, providing informal opportunity for locals to meet the Project team. ▪ 15 people spoke to the Project team, including passers-by, site workers, local farmers, and community stakeholders, with questions ranging from BESS capacity and operation to project purpose and development consent timelines ▪ Concerns raised included aesthetics and visual impact, screening effectiveness, safety of lithium-ion technology, and appropriateness of placing batteries on agricultural land ▪ Local economic and social issues were highlighted, including employment opportunities, housing shortages, support for small businesses, and funding gaps in community programs ▪ Stakeholders showed interest in engagement and benefit sharing, with some offering to provide input, attend meetings, or support local business and community initiatives connected to the Project.
Griffith City Council	September - December 2024	**Face-to-face Meeting**	▪ Meeting with Griffith City Council Community & Economic Development team ▪ Identified areas of local and social benefit contributions; engagement channels including Council Café (informal Councillors & Community meeting) ▪ Council's Investment Prospectus specifically identifies energy infrastructure investment as a priority. ▪ Suggested (1) industry partnerships to support nearby intermodal freight hub; (2) Grow Our Own for employment pathways.

Stakeholder	Date	Tools	Key details
	February 2025	**Face-to-face Meeting *(Special Council Meeting)***	▪ Special General Meeting help with Councillors to introduce the proposed Project, share information about BESS technology and gain feedback on upcoming community and stakeholder engagement opportunities ▪ Engaged with Community and Economic Development Team to maximise local industry participation and benefit sharing approach.
	February 2025	**Online Meeting**	▪ Ran through three-month plan for engagement and sought feedback ▪ Explained state significant development (SSD) process ▪ Request for a timeline of the planning process and clear direction as to where/when Council will be able to formally engage with the Scoping Report/EIS ▪ Council representatives commended proactive door knocking of neighbours ▪ Discussed benefit sharing approach and discussed relevant local stakeholders ▪ Planned to undertake a detailed meeting with Council's Community Development Coordinator.
	March 2025	**Online Meeting**	▪ Provided more information about Proponent's three areas of benefit sharing funding ▪ Council requested sample benefit sharing Terms of Reference and Fund documents for Eku's other projects ▪ Helped identify where there are gaps in funding that could benefit the community (e.g. Council provides funding for events, but not capital expenditure, insurance etc.) ▪ Provided contact details for local not-for profit groups to progress benefit sharing development ▪ Provided recommendations on venues for future engagement and community events.
	1 August 2025	**Online Meeting**	▪ Council reported general support for the proposed project, with minor public concerns regarding energy prices and safety; community benefits are being promoted to local groups by Council representatives. ▪ Update on pre-EIS engagement including with local stakeholders, with introductions and briefings planned. ▪ Social licence discussions emphasise good-faith agreements, local content prioritisation (focused on Griffith), and clarity on benefit fund distribution. ▪ Eku's pre-construction funding has been approved to include some early community initiatives, including an outdoor cinema.
	19 August 2025	**In-person Meeting (City Councillors Workshop)**	▪ Questions were raised about bushfire risk versus battery fires and training for local RFS, noting prior engagement at Deniliquin BESS ▪ Clarification provided on sourcing of materials: majority of battery cells from overseas, with some steel potentially locally sourced for foundations ▪ NSW Government submissions and public exhibition process confirmed, including opportunity for community feedback and possible additional community drop-in session hosted during exhibition period ▪ Local economic context noted, including low regional unemployment (2–3%) and potential use of local advice and expertise for project planning and operations.
	10 September 2025	**Online Meeting**	▪ Provided project introduction and update to incoming General Manager. Continued discussion of benefit sharing program and opportunities to co-design benefit sharing program structure and distribution.
Department of Planning, Housing and Infrastructure (NSW)	13 March 2025	**Online Meeting**	▪ Clearly differentiating Yoogali Solar Farm and the Griffith BESS as separate projects ▪ Suitability of timeline ▪ Refer to SEARs for other NSW projects ▪ Approach to include Biodiversity Development Assessment Report (BDAR) waiver.
	19 June 2025	**Online Meeting**	▪ Post SEARs meeting

Stakeholder	Date	Tools	Key details
			▪ New Aboriginal Heritage Information Management System (AHIMS) search required, approval needed from DPHI and Heritage NSW ▪ Progress update on benefit with Council. ▪ EIS must include landowner consents and confirmed water amounts.
	27 June 2025	**Phone Call**	▪ Call with lead DPHI planner for the Project ▪ Hazard assessment to address primary spacing, flame risk, and other relevant standards; risk assessment support available from specialist team ▪ Site access proposed via existing crossover, with process requirements to be confirmed ▪ Agency input considered, including heritage, local government, transport, and irrigation authorities; follow-up meetings and advice to confirm requirements ▪ Project timing and logistics coordinated to support EIS lodgement, including preparation of exhibition materials and early engagement with relevant contractors.
	03 July 2025	**Phone Call**	▪ DPHI advised that if Council have approved new crossover access into site, then it is an existing condition and does not need to be re-assessed during EIS.
TfNSW	13 March 2025	**Online Meeting**	▪ Transport routes still under review; both options may need assessment if undecided by EIS ▪ Site access via Bob Irvin Road; upgrades may be required at Irrigation Way intersection ▪ Underground cable to Griffith Terminal Station will cross Irrigation Way and railway; design to be perpendicular ▪ TfNSW requested full vehicle breakdown and confirmed a Works Authorisation Deed likely needed
	04 July 2025	**Online Meeting**	▪ Advice that transport routes should be very detailed ▪ Site access route is acceptable from Bob Irvin Road.
Local industry partners	September 2024	**Briefings**	▪ Online introductory meetings to introduce the proposed Project with potential industry partners (Western Riverina Community College; Griffith TAFE).
	December 2024	**Briefings**	▪ Griffith TAFE – introduced project, explored employment pathways and workforce alignment for the Project ▪ Western Riverina Community College - learnt about curriculum and advanced training services to support Project's workforce (i.e. construction training); explored College's investment areas and needs from a benefits sharing perspective.
	04 June 2025	**Introduction**	▪ Introduction, Eku Energy introduction to Wamarra, First Nations owned and operated civils contractor. Introduced the project and discussed potential opportunities to include First Nations workforce on Eku Energy projects. Explored initiatives that Wamarra are supporting in First Nations education and employment.
	30 June 2025	**Online Meeting**	▪ TAFE NSW - Discussion with Partnerships and Growth Lead. Outlined our investment commitments to enhance local employment and workforce capability. Discussion around partnership opportunities in the Riverina more broadly, including Griffith, Leeton, Hay and Narrandera
Transgrid	May 2024	**Online Meeting**	▪ Submission of Connection Enquiry; receipt of successful connection enquiry response ▪ Detailed grid analysis and studies in preparation of grid application.
	Ongoing	**Email and Phone Correspondence**	▪ Connection Process Agreement entered into in December 2024 ▪ Grid application expected to be lodged by July 2025 ▪ Detailed grid modelling continuing.

Stakeholder	Date	Tools	Key details
Griffith LALC	December 2024	**In person Meeting**	▪ Met CEO and offered introduction to Wamarra (Aboriginal owned construction business) and other Aboriginal owned trade services in the area. Also able to provide cultural heritage assessment services ▪ CEO requested introduction to Wamarra for sub-contracting ▪ Listened and learnt about local Wiradjuri people and areas of potential partnership for the Project.
	1 May 2025	**In person Meeting**	▪ CEO provided feedback on the site and benefit sharing opportunities with GLALC ▪ Desire for Aboriginal youth to find employment avenues, including in energy ▪ Concerns raised that projects make commitments that aren't followed through ▪ Desire to ensure that cultural artefacts are routinely identified and recorded by agricultural producers.
	20 August 2025	**In person Meeting**	▪ Expressed continued interest in developing the benefit sharing approach. Requests made for stronger First Nations procurement, including use of subcontractors.
	03 October 2025	**Site Walkover**	▪ Detailed site walkover for ACHAR with heritage consultant, LALC, and RAPs, including Damian Wall (Red-Gum Environmental Consulting), Stephen Young (GLALC), Robert Simpson (Marri Culture & Heritage Consultants), Desma Newman (Guggaburra Yiramiilan). ▪ No new heritage, historic, or archaeological sites were identified.
Heritage NSW	8 July 2025	**Online Meeting**	▪ Specific opportunities raised included support for the ranger program and transport bus, revival of the Tikandi facility, and funding for the 3 Ways NRL team. ▪ Ran through engagement conducted to date with GLALC, including for the submission of the Scoping Report ▪ Provided details of introductory meetings and site walkover with GLALC ▪ HNSW expectation that full ACHAR carried out with GLALC.
RFS	29 April 2025	**Face to face Meeting**	▪ Pre SEARs meeting held with Griffith RFS ▪ Griffith RFS did not voice major concerns or issues about the Project ▪ Local team have experience on BESS and renewables fires ▪ Regularly engage with FRNSW, but operate separately ▪ RFS will always be first responder and bring in FRNSW when BESS fire confirmed.
APA	14 April 2025	**Online meeting**	▪ Discussed requirements for working in and around the gas pipeline and easement ▪ Process for achieving agreements (commercial, basic) ▪ Options for passing over, versus under the pipeline ▪ APA understanding of asset location ▪ APA shared standard conditions for works near APA Gas Transmission Pipelines
	04 July 2025	**Phone call**	▪ Progress update and reiteration of APA requirements and expectations
Murrumbidgee Irrigation	27 March 2025	**Online meeting**	▪ Requirements for new works applications to pass over or under the irrigation channel ▪ Timing opportunities and constraints should any works in the channel be required, including modification to existing culverts

Stakeholder	Date	Tools	Key details
	06 May 2025	**Online meeting**	▪ Discussion of novel transmission corridor option to share irrigation channel

5.5 Community views

Key issues raised by the community and stakeholders during the EIS are summarised in Table 20. This identifies the main themes of concerns, the feedback that was heard and how this EIS responds to these issues.

Table 20 – Summary of community feedback, including issues and benefits

Theme	Feedback	How this EIS responds
Fire risk and safety	Concerns were raised around fire risk and management, notably the interactions between BESS fires and bushfires. The community questioned whether the local RFS would be adequately trained and resourced.	Eku acknowledges community concerns regarding fire risk, including potential interactions between BESS incidents and bushfires. The BESS design incorporates state-of-the-art fire detection, suppression systems, and safety controls, compliant with Australian standards and best practice guidelines. A comprehensive Fire Safety Study and Emergency Plan will be developed prior to any construction in consultation with, and approved by, the local RFS, FRNSW, and DPHI. This will include design, site-specific training, and emergency response protocols with consideration of a reasonable worst-case fire scenario both to and from the battery storage. To assist this, a bushfire assessment has been completed by Cool Burn (Section 6.10) which has defined existing conditions and baseline design requirements to afford protection of assets from landscape fires encroaching the Site. The project team will ensure that local fire services are adequately informed, trained, and resourced to respond to any incidents. Risk assessments will be continuously updated to address both operational and environmental fire scenarios.
Battery technology and supply chain	Some community members expressed unease towards the use of Lithium-Ion technology, supply chain concerns and the origin of materials used in the BESS units. Questions were also raised around whether BESS technology could affect local solar generation.	Eku acknowledges community concerns regarding Lithium-Ion technology, supply chains, and material sourcing, as well as potential effects on local solar generation. The proposed BESS will use commercially proven Lithium-ion technology, compliant with all relevant safety and environmental standards. Materials will be sourced from reputable suppliers meeting global industry standards, and procurement processes consider environmental, ethical, and regulatory requirements. The BESS is designed to integrate with the local electricity network, supporting rather than displacing existing solar generation, by storing excess energy during peak production and releasing it when demand is higher, improving overall system reliability and grid stability. Eku Energy has also committed to source at least 32.2% of all project inputs from Australian suppliers and will ensure that a minimum of 10% of all steel used is procured from Australian steel

Theme	Feedback	How this EIS responds
		manufacturers. These commitments form part of the obligations of the LTESA and have been endorsed by Council.
Visual, noise and amenity impacts	Feedback highlighted concerns about the visual impact of the battery unity, with questions around the visibility of the Project. Amenity issues included concerns around noise impacts, light pollution and potential effects on local property values.	Eku acknowledges community concerns regarding visual impact, noise, lighting, and potential property effects. A comprehensive landscape and visual impact assessment was undertaken to inform this EIS as detailed in Section 6.4. Mitigation measures include a recommendation on the material selection, with the BESS units and buildings being ameliorated through the use of a non-reflective finish of a natural green/grey/brown colour, as found in the landscape of the setting. Noise modelling detailed in Section 6.5 has used conservative (i.e. more impactful that realistically expected) construction and operational noise scenarios with consideration of nearby sensitive receptors including neighbour dwellings. It found that the Project will comply with the EPA *NSW Noise Policy for Industry* and *Interim Construction Noise Guideline* in its current form. Adherence to both limits will form part of the conditions of consent, if granted, and therefore the Project will not be permitted to operate if the limits are exceeded. Further mitigation options, such as physical layout, noise walls, and operational limits can be implemented to ensure compliance. Lighting will be limited to safe operational needs with baffling and orientation to limit external spill and glow. Conditions to this effect are expected in the consent, if granted, which will require the Project complies with *Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting*. The project will maintain transparent engagement, consulting with neighbours to refine visual and amenity outcomes and ensure any impacts are managed in accordance with regulatory and community expectations.
Site suitability and agricultural land use	Some stakeholders opposed the use of irrigated, agricultural land for renewable projects, expressing scepticism about the need for large-scale energy infrastructure in farming areas. However, many also noted their support for the location, noting it was on disturbed land, within an existing approved development at a reasonable distance to residential areas.	Section 7.1 provides a background of the site selection process, which highlights the suitability of the site in terms of proximity to supporting energy infrastructure, the previous disturbance of the site, and the limited environmental constraints at the site. The Project would not occupy or remove any irrigation land from active agricultural use because the Site has been selected to make efficient and complementary use of land already approved for the Yoogali Solar Farm. The Yoogali Solar Farm, like Griffith Solar Farm nearby, has been sited adjacent to the existing energy transmission and distribution infrastructure of the Griffith Substation built in the 1960s. This clustering of energy uses minimises amenity changes and impact to agricultural land, as well as maximises energy efficiency in the grid.
Energy affordability and reliability	Community questioned if the BESS would increase energy prices, and raised concerns about power supply, reliability and impacts on vulnerable households.	The Griffith BESS is a project of state significance, having been awarded a NSW LDS LTESA from AEMO Services in February 2025. Engagement with the community has focused on explaining how the agreement will provide an eight-hour duration storage capacity to store excess renewable energy

Theme	Feedback	How this EIS responds
		and dispatch it during periods of high demand. When it is operational, the BESS seeks to balance supply and demand, reduce energy price volatility, and contribute to the stability of the electricity grid in the NEM.
Benefit sharing	Questions were raised about the balance of funding towards Council, First Nations communities and the broader community. Broader issues of social equity were highlighted, including housing shortages, limited job opportunities and the lack of funding for local programs.	Through early engagement with Griffith City Council, local not-for-profit organisations and local education and employment providers has ensure the project team understand the needs and aspirations in relations to building social and economic value in Griffith. As a result of conversations throughout the planning stage of the Project, the Proponent seeks to increase the overall benefit sharing commitment from the Project. Further to the LDS LTESA Social Licence Commitments, the Proponent is discussing opportunities to align the Project's total funding for benefit-sharing with the DPHI *Benefit-Sharing Guideline for large-scale renewable energy projects*. Feedback informed the benefit sharing approach detailed in Section 5.8.
Local procurement and job opportunities	Contractors and suppliers expressed strong interest in project participation, with calls for greater involvement of First Nations subcontractors. Some stakeholders requested clarity on how "local" would be defined, emphasising the inclusion of Griffith itself.	Information has been gathered during engagement activities to date regarding local businesses and subcontractors to take forward to the Project's principal construction contractor. Eku Energy has engaged with local contractors for initial studies (site surveys and geotechnical investigations), and principal contractor is required to engage local workforce and businesses, with suitable governance to be implemented to comply with LTESA obligations. As per the LDS LTESA Social Licence Commitments, the Project will invest in the enhancement of local employment and workforce capability. During operations, the Project will invest in local supply chains or local innovators, supporting the region's ongoing economic development and innovation.
Governance and process	The community noted a desire for transparency throughout the EIS and approvals process, including timing of lodgement, public exhibition and benefit-sharing agreements. Suggestions on engagement included town hall-style meetings during exhibition if requested, and clearer information on benefit sharing and social license agreements.	Eku remains committed to meeting and exceeding the Griffith community's expectations about communication the project. This has meant delivering a range of engagement activities that sought to reach locals in the places they frequented as well as hosting formal community drop-in sessions to ensure a range of people could understand the project and provide feedback during the preparation of the EIS, in line with guidelines for State Significant Projects.

5.6 Public exhibition of the EIS

The EIS will be placed on public exhibition for a minimum of 28 days in accordance with the *EP&A Act* and SSD approval pathway. Interested parties will be notified via public advertising of public exhibition, along with where to view the EIS and how to make written submissions to DPHI.

Information about the EIS will be made available on:

- The Project website: https://www.ekuenergy.com/aus/projects/griffith-bess

- DPHI Major Projects Portal: https://www.planningportal.nsw.gov.au/major-projects

Engagement carried out following public exhibition of the EIS is detailed in the following section.

5.7 Ongoing and future engagement

Ongoing engagement with the community and stakeholders will continue during the EIS exhibition and assessment phase. During the public exhibition period, the community and other stakeholders will be advised of the opportunity to review the EIS and make written submissions to DPHI regarding the Project.

Engagement carried out after exhibition of the EIS will most likely focus on responding to any key and substantive issues raised in submissions. A submissions report would then be prepared by the Proponent for submission to DPHI which would respond to community and stakeholders' comments on the EIS and be publicly available via the DPHI Major Projects website.

Ongoing engagement will include:

- Advertising the EIS public exhibition in local newspapers and promote on website.
- Email or call previously engaged community members to inform them on next steps for the Project and provide further newsletters.
- Email stakeholders that have been met with to update them on timing and provide any responses to their questions or concerns that were raised during the proposed Project.
- Other additional stakeholder meetings and liaison, as required.

5.7.1 Complaints management process

The Proponent has established a Complaints Management Process that aims to establish an open and transparent complaint handling procedure. This approach ensures that complaints and queries will be handled fairly and objectively.

This process is underpinned by the following principles:

1. Anyone can make a complaint via the multiple established communications channels
2. Complaints are assessed and explored impartially by staff
3. Action is taken to resolve the complaint, where reasonable
4. Responses to complaints are returned within established timeframes
5. Complaints are reviewed to understand issues and improve where applicable
6. Complainant information is managed in accordance with privacy laws
7. The procedure applies to all project staff
8. All enquiries and complaints will be recorded in the Project consultation database.

5.8 Powering Big Dreams Benefit Sharing Model

Eku is committed to working in partnership with the community to help identify and support initiatives with impact that can deliver long-term, broad-reaching benefits for residents and community members. Powering Big Dreams is about co-creating programs that turn big dreams into reality for local communities like Griffith.

The Eku team will seek ideas from not-for-profit organisations to support initiatives that align with the following three principles:

- Employment and education: initiatives that support educational or employment outcomes.
- Social connectedness: initiatives that support community connectedness, wellbeing and liveability.
- Environment: initiatives that support or drive sustainability and environmental outcomes.

The project will share funding in two waves - the first during the construction period which is likely to be from mid-2026 to late 2027, and second when Griffth BESS is operational from 2028.

The committed LDS LTESA Social Licence Commitments are expected to generate social and economic value in Griffith. Early engagement with Griffith City Council, local not-for-profit organisations, GLALC, and local education and employment providers has ensured the project team understands the needs and aspirations for building social and economic value in Griffith. The funds will be delivered to local community, First Nations, local employment and local content over the life of the Project. As a result of conversations throughout planning stage of the Project, the Proponent seeks to increase the overall benefit sharing commitment from the Project. Further to the LDS LTESA Social Licence Commitments, the proponent is discussing opportunities to align the Project's total funding for benefit-sharing with the DPHI *Benefit-Sharing Guideline for large-scale renewable energy projects*. This includes an opportunity to deliver further benefit-sharing through a VPA with Council.

Details of the application process and information sessions for applying for funding are intended to be run in 2026.

6. Assessment and mitigation of impacts

As per the Project-specific SEARs, the following key issues required to be addressed have been included in this section:

- Biodiversity
- Heritage
- Land
- Landscape and Visual
- Noise
- Transport
- Water and Soils
- Hydrology
- Hazards
- Bushfire
- Social
- Economic and Benefit-Sharing
- Waste

This section seeks to address the following SEARs EIS requirements in some or full capacity:

- *consistency in information presented in the EIS and all technical reports, including distances, development footprint, project design and infrastructure proposed, construction timeframes and receiver numbers*
- *a risk assessment of the potential impacts of the development, identifying the key issues for further assessment;*
- *an assessment of the likely impacts of the development on the environment, and any other significant issues identified in the above risk assessment, focusing on the specific issues identified below, including:*
  - *a description of the existing environment likely to be affected by the development using sufficient baseline data;*
  - *an assessment of the likely impacts of all stages of the development (which is commensurate with the level of impact), including any cumulative impacts of the site and existing, approved or proposed developments in the region and impacts on the site and any road upgrades, taking into consideration any relevant legislation, environmental planning instruments, guidelines, policies, plans and industry codes of practice including the Cumulative Impact Assessment Guideline (DPE, 2022);*
  - *a description and assessment if staging of the project is proposed including any site mobilisation or pre-construction works;*
  - *a description of the measures that would be implemented to avoid, mitigate and/or offset the impacts of the development; and*
  - *a description of the measures that would be implemented to monitor and report on the environmental performance of the development.*

6.1 Biodiversity

A BDAR Waiver (Appendix F) was prepared by Niche Environment and Heritage Pty Ltd (Niche) in response to the SEARs (Table 21) and summarised in this section. Section 7.9(2) of the NSW Biodiversity Conservation Act 2016 (BC Act) states that a State Significant Development (SSD) application must be accompanied by a BDAR unless the Planning Agency Head (or delegate) and the Environment Agency Head (or delegate) determines that the proposed development is not likely to have any significant impact on biodiversity values. This determination is referred to as a BDAR waiver.

Table 21 – Biodiversity SEARs requirements

Requirement	Relevant Section
Biodiversity An assessment of the biodiversity values and the likely biodiversity impacts of the project in accordance with Section 7.9 of the Biodiversity Conservation Act 2016 (NSW) (BC Act), having regard to the Biodiversity Assessment Method (BAM) 2020 and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must: ▪ be prepared using the approved BDAR template; ▪ document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the BAM; ▪ assess the impacts associated with all ancillary infrastructure, including the transport route road upgrades; ▪ include an assessment for serious and irreversible impacts (SAII) in accordance with Section 9.1 of the BAM; ▪ include a strategy to offset any residual impacts of the development in accordance with the BC Act; and ▪ be finalised by an accredited assessor as BAM-compliant within 14 days of submission; unless Conservation Programs, Heritage and Regulation Group (CPHR) and the Department of Planning, Housing and Infrastructure (DPHI) determine the proposed development is not likely to have any significant impacts on biodiversity values.	6.1
An assessment of the likely impacts on listed aquatic threatened species, populations or ecological communities, scheduled under the Fisheries Management Act 1994, and a description of the measures to minimise and rehabilitate impacts;	6.1.2
A cumulative impact assessment of biodiversity values in the region from nearby developments; and	6.13.3.1
If an offset is required, details of the measures proposed to address the offset obligations.	6.1.2

6.1.1 Existing

The Development Area is situated adjacent to the approved Yoogali Solar Farm, currently under development, and covers an area of approximately 5.1 hectares. The Development Area has been highly modified by previous clearing of vegetation and agricultural practices (irrigation, cropping, horticulture and grazing). Most of the site has been laser levelled for irrigated cropping and has been farmed for many years.

The Development Area consists predominantly of exotic grasses and forbs with an average of 22% regenerating native rushes and grasses (dominated by Juncus usitatus – Common Rush), and some widely spaced Weeping Myall (Acacia pendula) shrubs. The Development Area has high levels of bare earth (27%), exotic plants (51%) and the diversity of native plants is very low and dominated by Juncus usitatus which grows in moist disturbed sites. The few remnant areas of roadside vegetation along Bob Irvin Road and Irrigation Way are mapped as Category 2 – Regulated Land Area (not identified as vulnerable or sensitive).

No habitats suitable for threatened species were recorded during the site assessment. The vegetation at the Development Area provides low quality fauna habitat limited to potential foraging habitat for mobile species that may visit infrequently. No important habitat features (karst, caves, crevices, cliffs and other geological features of significance, rocks) occur at the Development Area. There were no habitat features (fallen timber, shrubs, trees or rocks) recorded in the BESS Area.

6.1.2 Impacts

Given the highly modified nature of the Development Area, and no proposed native vegetation removal, the Project is not likely to have a significant impact on biodiversity values. The only vegetation that is expected to be removed as part of the Project is highly degraded vegetation that consists of predominantly exotic grasses and forbs. Furthermore, no vegetation within the Development Area is mapped as a native Plant Community Type (Figure 3) and the majority of vegetation within the development site is mapped as Category 1 – Exempt Land on the Draft Native Vegetation Regulatory Map (Figure 14).

There are no farm dams, other rivers, streams or wetlands within or adjacent to the Development Area. Mirrrol Creek occurs approximately 2km south-east of the development site. The Project is not anticipated to impact any creek system or waterbody in the surrounding area. The only waterbodies that occur proximate to the Development Area are two irrigation canals that do not support any aquatic habitats. Therefore, no impacts to aquatic threatened species, populations or ecological communities under the Fisheries Management Act 1994 are expected.

Figure 14 – Native vegetation regulatory map

6.1.3 Mitigation measures

The BDAR waiver concludes that the Project will not result in direct or indirect impacts on biodiversity values. Therefore, no mitigation measures are proposed, no offsets are required and no cumulative impacts are anticipated.

6.2 Aboriginal and Historic Heritage

An Aboriginal Cultural Heritage Assessment Report (ACHAR) (Appendix G) was prepared by Red Gum Environmental Consulting Pty Ltd (Red Gum) in response to the SEARs (Table 22)and summarised in this section.

The ACHAR examines Aboriginal and Historic heritage values within the Development Area and includes desktop searches of archaeological databases, consultation with the local Aboriginal community, field survey, and preparation of management and mitigation recommendations.

Table 22 – Heritage SEARs requirements

Requirement	Relevant Section
Heritage An Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and the Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), identifying, describing, and assessing any impacts to any Aboriginal cultural heritage sites or values associated with the site (including impacts from any proposed earth works, construction works and road upgrades), including results of archaeological test excavations (where required), undertaken in accordance with the relevant standards and requirements, unless Heritage NSW and DPHI agree otherwise;	Appendix F
Evidence of adequate consultation with Aboriginal communities in determining and assessing impacts, identifying and selecting options for avoidance of Aboriginal cultural heritage and identifying appropriate mitigation measures (including the final proposed measures), having regard to the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010); and	6.2.2
Assess the impact to historic heritage having regard to the Guidelines for Preparing a Statement of Heritage Impact.	6.2.1

6.2.1 Existing

Aboriginal Heritage

An extensive AHIMS search conducted on 17/01/25 and 13/10/25 returned zero records within the Project Site and eight records within a 5km buffer. The closest Aboriginal cultural heritage site to the Development Area was recorded 170 metres north of the site (49-2-0153 “Yoogali Site 3, Artefact).

A field survey was undertaken on 3/10/25 which included three Traditional Owner survey participants. A total area of 2.6ha was traversed which centred on 12 exposure sites. No artefacts or Potential Archaeological Deposits (PAD) were recorded during the survey period. It is considered that the paucity of the finds was due to the Site’s long history of intensive agriculture. Given that no new areas of Aboriginal heritage were identified during the survey, and the long history of agricultural pursuits and its associated impacts on the landscape, it was determined that no Survey Units within the Development Area warrant further archaeological investigation.

The survey results indicate the scientific significance of the Development Area is ‘Low to Nil’, the cultural significance is ‘low to medium’ and the archaeological significance is ‘low to nil’.

Therefore, the Development Area is predicted to be of low or very low archaeological potential and sensitivity and hence, the survey results are assessed to have provided a reasonably reliable indication of the archaeological status of the area.

Historic Heritage

The Development Area has been used for a variety of agricultural activities since the 1840s, including pastoral grazing, irrigated farming and rice and wheat cropping. The Development Area also includes sections of Irrigation Way and the Griffith to Narrandera railway line have been in operation since 1912 and 1922 respectively. As a whole, the Development Area should be considered to have been intensively used for around 100 years, which has created reasonable substantial disturbance to land surfaces.

A search of heritage databases was undertaken on 13/10/2025 and returned no records within or in the vicinity of the Development Area and no historic objects or places were identified during the field survey undertaken on 3/10/25.

The historical archaeological potential of the Development Area is considered to be 'Nil' due to the scarce and unsubstantial built structures, the long-term use of for irrigated cropping and grazing, and the paucity of historical material observed during survey.

6.2.2 Consultation

Aboriginal community consultation was undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (State of NSW and Department of Environment 2010) (Consultation Requirements)* and clause 80C of the *NSW National Parks and Wildlife Regulation 2009*.

Consultation involved notifying potentially interested Aboriginal Stakeholders of the ACHAR and inviting them to provide feedback on the cultural heritage significance of the Development Area. Cultural values were also further discussed with all six Registered Aboriginal Party (RAP) groups during the heritage surveys.

Consultation did not reveal any new sites of Aboriginal cultural heritage, nor reveal new information on the past utilisation of the landscape. Therefore, the cultural significance of the Development Area is considered to be low to moderate.

6.2.3 Impacts

No Aboriginal or historic heritage sites or places were identified during the survey therefore the Project is predicted to have a low or very low potential to impact Aboriginal cultural heritage and no impact to historic heritage.

6.2.4 Mitigation measures

Despite the low potential to impact aboriginal and historic heritage, the additional recommendations were made to minimise impacts:

1. The Proponent should ensure that all employees and contractors are aware that it is an offence under Section 86 of the NPW Act to harm or desecrate an Aboriginal object unless that harm has been subject to approval as part of the necessary approvals process.
2. Protection of Cultural Knowledge: Any cultural knowledge shared throughout this process must remain under community control. Approvals must be sought from the relevant contributors before any material is published, used in reports, or shared publicly.
3. No further archaeological research is considered to be necessary or warranted in regard to the proposed Griffith BESS project. No areas of potential archaeological deposits or Aboriginal heritage objects have been identified.
4. Prior to ground disturbance, the proponent is to engage a heritage specialist to prepare a Cultural Heritage Management Plan (ACHMP) to address the potential for finding additional Aboriginal artefacts during construction following development consent. The ACHMP will outline an unexpected finds protocol and an unexpected skeletal remains protocol, and induction policies that will include a cultural heritage awareness procedure. Preparation of the ACHMP should be undertaken in consultation with the Griffith LALC and all Traditional Owner RAPs consulted as part of this ACHAR.

5. The Construction Environment Management Plan (CEMP), or equivalent, should reinforce how the cultural landscape is considered throughout the project and detail the rehabilitation of the Assessment Area. This should be undertaken in consultation with the Griffith LALC and all Traditional Owner RAPs consulted as part of this ACHAR.
6. All works proposed must be constrained to within the Development Area (including access tracks and lay down areas).
7. Further archaeological assessment would be required if the proposal activity extends beyond the area of the current investigation. This would include consultation with the Griffith LALC, plus all Traditional Owner RAPs consulted as part of this ACHAR and may also include further field survey.
8. All topsoil removed during the construction of road access within the Development Area is to remain on site and used in rehabilitation works. This will ensure that in the low likelihood that this soil may contain Aboriginal objects, they will remain 'on country'.

6.3 Land Use and Agriculture

An Agricultural Impact Assessment (Appendix N) has been prepared by Tremain Ivey Advisory to assess against parts of the Key Issue, Land, identified in the Project SEARs. In particular, the following elements of the requirement have been included in the scope of the assessment:

Requirement	Relevant Section
Land	
An assessment of the potential impacts of the development on existing land uses on the site and adjacent land, including: ▪ agricultural land, flood prone land, nearby drinking water catchments, Crown lands, mining, quarries, mineral or petroleum rights (if relevant);	6.3.2
An assessment of the compatibility of the development with existing land uses, during construction, operation and after decommissioning, including: ▪ Completion of a Land Use Conflict Risk Assessment in accordance with the Department of Industries Land Use Conflict Risk Assessment Guide (if required); ▪ an assessment of impact on agricultural resources and agricultural production on the site and region; and	6.3.2.2 6.3.2.3

Further, this assessment has:

- Described the current socio-economic and environmental situation relevant to agricultural enterprises in the Project Site
- Assessed the impacts of the Project on agriculture in the Project Site and in the surrounding region
- Formulated mitigation and management measures to minimise the impacts on agriculture in the Project Site and in the surrounding region.

6.3.1 Existing

The assessment found that whilst the BESS Area, and broader landholding at 15 and 41 Bob Irvin Road was once used for irrigated, dryland cropping; these uses have ceased as the land parcel was approved for the Yoogali Solar Farm in 2018. The soil is classed as Class 3 under the Land and Soil Capability Assessment Scheme classification conducted by the NSW Government in 2012. Class 3 is high capability land with moderate limitations. Interventions are expected to be required for productive agricultural use. The Project Site is also classed as state significant agricultural land by DPHI, however this is highly related to areas developed for irrigation as opposed to the soil/land capacity itself. It is, however, not mapped as biophysical strategic agricultural land.

There are a number of weed and other pest species present in the environs of the Project Site and surrounds. These include the Boneseed weed most commonly, as well as foxes and wild rabbits.

The Griffith LGA's second largest industry is agriculture, forestry and fishing. Historically the Project's land was utilised for this industry, producing broadacre crops. While the land currently fallowed, it is estimated that that the primary Project Site would have been capable of producing $2,000 per hectare per year. Resumption of the Project Site to any form of agricultural production was assessed as not viable for the following reasons:

- The high cost of reinstating a connection to the irrigation for the small land area would be unfeasible
- The land would not produce productively as a standalone dryland cropping area
- Incorporation with a larger cropping enterprise would be difficult due to the small land size and relative isolation
- Grazing of livestock would be inefficient due to the management required but only small number of livestock that could be run.

6.3.2 Impacts

6.3.2.1 Construction

During the construction phase of the Project, the assessment found the following as potential impacts on the Project Site land, and agricultural use:

- A loss of 0.006% of Griffith LGA's gross agricultural production income, if the land were to be used for irrigated cropping. However, as this use as ceased with the approval of the Yoogali Solar Farm, there is no loss of production or income expected.
- The production of construction-related dust with the potential to reduce the quality and yield of neighbouring pastures.
- There is potential for impact on livestock through noise disturbance and vehicle movements. Yet, the level of livestock in the vicinity of the Project is low, meaning that the disturbance will be minimal.

6.3.2.2 Operation

Once operational, the Project is expected to be fairly negligible in terms of impact on surrounding agricultural uses and productivity. This is attributable to the low level of traffic and activity at a BESS across a typical operating day. The primary impact during the operational period is from loss of land use. This has been assessed as a gross loss of $8,600 per annum, if the land were to be returned to prior use for irrigated cropping.

6.3.2.3 Land Use

A Land Use Conflict Risk Assessment (LUCRA) was also undertaken as part of this assessment, with the methodology established by DPI (2011). The results, before any mitigation measures were considered, ranged from D1 (19) to C4 (8). Following the hypothetical implementation of mitigation measures, the revised risk ratings ranged from A5 (11) to D5 (2). Whilst A5 is considered 'high risk', this result is the lowest score possible where an activity is 'almost certain'. In this case, this score is assigned to the long-term loss of agricultural land during operation.

6.3.3 Mitigation measures

Table 23 sets out the mitigation measures that were considered in the LUCRA assessment to lower risk rating scores.

Table 23 – LUCRA Mitigation Measures

Impact	Mitigation measures	Timing
Biosecurity	▪ All project vehicles to be cleaned and free of biosecurity matter before entering or leaving the Project area. ▪ New or existing infestations of any priority weed or unidentified weed will be reported to the appropriate weeds authority. ▪ Where present within the Project area, weeds will be managed in accordance with the Biosecurity Act 2015 and the relevant regional strategic weed management plans. ▪ Disturbed areas will be stabilised and appropriately rehabilitated in line following the completion of construction.	Construction
Disruption	▪ Nearby landowners will be consulted regarding the proposed timing and location of construction works, especially where some restriction on vehicular or stock movements would be necessary. This will minimise disruption to agricultural activities on neighbouring properties.	Detailed design and construction
Dust	▪ Dust suppression measures such as water carts and road polymers to keep dust levels down will be implemented. Vehicle speeds will be limited to reduce dust generation. ▪ Disturbed areas will be stabilised and appropriately rehabilitated following the completion of construction.	Construction
Livestock disturbance	▪ Procedures will be implemented so that potential impacts or conflicts between neighbouring livestock and construction activities are appropriately managed. Procedures will be developed in consultation with affected landowners and will include management of: – Noise intensive activities during sensitive periods within the livestock production cycle (such as lambing and calving) – Vehicle movements and other activities within the vicinity of livestock – Movement of stock away from potential stressors created by construction activities.	Construction and operation
Fire	▪ A bushfire plan will be prepared for the Project and will include mitigation measures applicable to construction and operation activities undertaken during the bushfire danger period. ▪ Fire loads will be minimised within the project area through control of vegetation.	Construction and operation
Rehabilitation	▪ Disturbed areas will be stabilised and appropriately rehabilitated following the completion of construction.	Construction
Decommissioning	▪ A decommissioning plan will be prepared when required at the Project's end of life. The Project area will be returned a condition suitable for dryland cropping unless it is required for an alternative land use. ▪ Access tracks and other bare areas will be rehabilitated to native pasture which may include addition of topsoil, restored drainage, and restoration of vegetation. ▪ Above ground infrastructure will generally be removed, unless a future use is identified. Underground infrastructure (such as cables and footings) may be removed where practical to a depth of 0.5 metres below ground surface but may otherwise remain. ▪ Any contamination or waste will be removed or managed according to regulations. Weed infestations will be controlled during the decommissioning process, if possible.	Decommissioning

6.4 Landscape and Visual

A Landscape and Visual Impact and Visual Assessment Report (LVIA) (Appendix H) has been prepared by Peter Haack Consulting following the guidance offered by:

- Guidance for Landscape and Visual Impact Assessment (GLVIA), Third Edition, Landscape Institute and Institute of Environmental Management & Assessment (2013).
- Guidance Note for Landscape and Visual Assessment, Australian Institute of Landscape Architects (AILA) (2018).
- Guideline for Landscape Character and Visual Impact Assessment – Environmental Impact Assessment Practice Note EIA-N04, NSW Transport (2023).

The LVIA has been prepared to meet the following requirements of the Project SEARs, within the key issue of Land.

Table 24 – Landscape and Visual (Land) SEARs requirements

Requirement	Relevant Section
Land a detailed assessment of the likely visual impacts of all components of the project on surrounding residences (including approved developments, lodged development applications and dwelling entitlements), and key locations, scenic of significant vistas and road corridors in the public domain; and	6.4.2
Details of measures to mitigate and/or manage potential impacts (including a draft landscaping plan for on-site perimeter planting, with evidence it has been developed in consultation with affected landowners).	6.4.3

6.4.1 Existing

The existing landscape environs at the Project Site are a mix of modifications for infrastructure and flat, cleared terrain. The surrounding Griffith Substation and operational Griffith Solar Farm are large-scale installations in the landscape, as well the existing 132 kV overhead transmission lines that converge at the Griffith Substation.

The surrounding area is comprised of a patchwork of intensive agricultural and horticultural activities arranges in blocks, with crops ranging in size from low growing forms to vineyards and citrus orchards. The lack of nearby elevated topography, which reduces opportunities for overlooking, combined with the blocks of dense orchards and vegetation surrounding residences, results in views to the Project Site being often filtered or screened.

The primary Landscape Character Unit (LCU) of the surrounds of the Project is agricultural. This is characterised by low scenic quality, as land use is focussed on production and infrastructure. The cleared nature of the land, as well as lack of diverse topography and vegetation contribute to reduced scenic values. As such, the absorptive quality of the landscape is high, given the flat topography and existing vegetation that acts well as existing screening at residences and along road reserves.

6.4.2 Impacts

The viewshed expected from the Project is expected to be approximately 5km, given the clear landscape and very flat topography of the surrounds. The LVIA has assessed the sensitive receptors within 2km of the Project, where there is potential for higher sensitivity viewpoints.

Of the six residences within 1km of the Project, four are highly screened and two are partially screened from view of the BESS Area. Within 1-2 km from the BESS Area, 22 residences are highly screened, 12 are partially screened, whilst six have minimal screening. Of these six, vegetation has only been assessed at the residence itself and does not take into account intervening vegetation that may obstruct views between the property and the Project.

The LVIA found there were 15 viewpoints within 2 km of the Project from uses considered to be of higher sensitivity and fall within the viewshed of the Project. All viewpoints are assessed as having ‘no’ or ‘low to moderate’ impacts within only one viewpoint (VP15 – Lots with entitlements at Morely Road) with a moderate impact.

Overall, the visual impact of the Project is very low to low, primarily as a result of residences being surrounded by vegetation, as well as the occurrence of intervening vegetation in the landscape which screens or filters views of what are mostly low project components.

6.4.3 Mitigation measures

The following ameliorations were proposed to mitigate the landscape and visual impacts of the Project:

- **Material selection** – BESS units and buildings should be ameliorated, where feasible and not interfering with equipment functionality, through the use of a non-reflective finish of a natural green/grey/brown colour, as found in the landscape of the setting.

6.5 Noise

Noise and Vibration Assessment (Appendix I) was prepared by Marshall Day Acoustics in response to the SEARs (Table 25) and summarised in this section.

The assessment assess the relevant operational and construction noise of the BESS with regard to the NSW EPA Noise Policy for Industry (2017), NSW DECC Interim Construction Noise Guideline dated (2009), NSW Department of Climate Change, Energy, the Environment (DECCW) publication NSW Road Noise Policy (2011), and NSW DECC Assessing Vibration: A Technical Guideline (2006).

Table 25 – Noise SEARs

Requirement	Relevant Section
Noise An assessment of the construction noise impacts (including impacts from proposed road upgrades) of the development in accordance with the Interim Construction Noise Guideline (ICNG), operational noise impacts in accordance with the NSW Noise Policy for Industry (2017), assess traffic noise having regard to the NSW Road Noise Policy (DECCW, 2011) and cumulative noise impacts (considering other developments in the area), including (where appropriate): ▪ identification of impacts associated with construction, site emission and traffic generation at noise affected sensitive receivers, including the provision of operational noise contours; ▪ details of noise monitoring survey, background noise levels and amenity noise levels at the most-affected residential receivers; ▪ details of likely daily charging/discharging load profile, manufacturer specifications for plant and equipment and noise source inventory (including intensity, quantity, location, directivity and frequency information)]; ▪ an assessment of 'worst case' noise emission scenarios during periods of discharging and charging; ▪ consideration of annoying characteristics of noise and prevailing meteorological conditions in the study area; and ▪ details and analysis of the effectiveness of proposed management and mitigation measures to adequately manage identified impacts, including a clear identification of residual noise and vibration impacts following application of these mitigation measures and details of any ▪ proposed compliance monitoring programs.	6.5

6.5.1 Existing

The Project is located in a rural environment with 48 receivers identified within 2 km of the Project.

In accordance with the Noise Policy for Industry, all receivers have been determined to have *'Rural Residential'* receiver category.

Based on this, Table 26 provides the relevant project noise trigger levels associated with the Project.

Table 26 – Project noise trigger levels, dB LAeq, 15 min

Time of day	Project noise trigger level
Day	40
Evening	35
Night	35

6.5.2 Impacts

Operational noise

On the basis that the Project has the potential to operate under worst-case scenario operational conditions at any time of day, evening or night, the most stringent noise trigger, being 35 dB LAeq, 15 min, applies as the controlling factor for compliance.

Nine of the 48 identified receivers had a predicted noise level of greater than 25 dB LAeq 15 min, but below the most stringent project noise trigger level of 35 dB LAeq, 15 min, by a minimum margin of 1 dB.

It is noted that the operational noise assessment is inherently conservative, particularly with respect to the adoption of worst-case operation of all cooling systems. In the evening and night periods, when ambient temperatures are lower, cooling system operation will be reduced. Noise levels during reduced cooling system operation will be lower than predicted by this assessment.

Construction noise and vibration

Noise affected management levels are predicted to be exceeded during construction, however work practices and mitigation measures would be employed to mitigate the impact of construction noise and vibration.

Traffic noise assessment

The Project has the potential to have relative traffic noise level increases as a result of proposed construction activities along Bob Irvin Road during both day and night periods and along Hanwood Avenue during the night period.

The road traffic noise assessment defined the minimum setback distance along these roads as 40 and 80 m from Bob Irvin Road in the day and night periods respectively and 90 m from Hanwood Avenue during the night period. There is one receiver located within the predicted day setback zones, and five receivers located within the predicted night setback zones.

There is also potential for road traffic noise impacts should the alternative OSOM route of Murray Road be relied upon.

The increase in traffic noise from the already low existing volumes may result in a noticeable increase in noise during some periods of construction. Noise mitigation options are generally limited for local roads, with community consultation and regular communication being the most effective and practical means of minimising adverse impacts.

6.5.3 Mitigation measures

No mitigation measures are required for operational noise, as the predicted noise level at receivers is below the most stringent project noise trigger level of 35 dB LAeq, 15 min, by a minimum margin of 1 dB.

To mitigate construction noise and vibration impacts a Construction Nosie and Vibration Management Plan will be prepared which may include:

- universal work practices
- consultation and notification
- plant and equipment, e.g. utilising bored piling in lieu or impact or vibratory piling
- on-site controls
- work scheduling
- transmission path and at-receiver considerations
- restricting works to normal construction hours.

To mitigate traffic noise impacts:

- residents residing nearby to Bob Irvin Road and Hanwood Avenue be included in consultation prior to, and during, construction
- limiting construction traffic speed for the affected road sections
- reducing the maximum number of OSOM movements to once or twice each night
- scheduling OSOM for times when adverse impact is less likely, e.g. the very start of the night period and the very end of the night period, to reduce the potential for sleep disturbance

6.6 Transport

A Traffic Impact Assessment (Appendix K) was prepared by One Mile Grid in response to the SEARs (Table 27) and summarised in this section. The assessment aims to identify key traffic impacts associated with the construction and operation of the proposed battery energy storage system and identify any infrastructure necessary to support the use and mitigate potential impacts.

Table 27 - Transport SEARs

Requirement	Relevant Section
Transport An assessment of the peak and average traffic generation, including light vehicles (including shuttle buses), heavy vehicles, heavy vehicles requiring escort, high risk heavy vehicles requiring escort (noting Table 1 in TfNSW Fact Sheet - Transport Management Plans for Over Size and/or Overmass Movements in NSW) and construction worker transportation;	6.6.2
An assessment of the likely transport impacts to the site access route(s) from the above listed vehicles including the site access point(s) and any Crown land, particularly in relation to the capacity and condition of the roads, road safety and intersection performance;	6.6.2
A concept Level Route Analysis required for heavy vehicles requiring escort and high risk heavy vehicles requiring escort; a cumulative impact assessment of traffic from nearby developments (including mining operations); and	6.6.2
Provide details of measures to mitigate and / or manage potential impacts (developed in consultation with the relevant road authorities) including: ▪ a schedule of all required road upgrades (including resulting from heavy vehicle and over mass / over dimensional traffic haulage routes), ▪ strategic concept designs of proposed road upgrades (including the site access point); and ▪ road maintenance contributions, and any other traffic control measures.	6.6.3

6.6.1 Existing

The Project is located on the south side of Irrigation Way, on Bob Irvin Road, on the same land as the approved but yet to be constructed Yoogali Solar Farm. Current access to the site is via a concealed crossover and access track to Bob Irvin Road.

Road network

Bob Irvin Road is a local road that is unsealed for the 2.5km section between Irrigation Way to Wincey Road, adjacent to the site, that is approximately 10m wide, allowing two-way traffic movements, The sealed section between Wincey Road and Hanwood Avenue is approximately 5m wide pavement with gravel shoulders.

Irrigation Way is a state controlled arterial road running between Griffith and Narrandera. Irrigation Way provides a single traffic lane in each direction with a combination of sealed and gravel shoulders on both sides. A drainage channel runs parallel to the alignment of Irrigation Way on the south side of the road reservation, which sits between the subject site and the Irrigation Way carriageway. A 100km/h speed limit applies to Irrigation Way.

The intersection between Irrigation Way / Bob Irvin Road / Hamilton Road is provided as a standard four-way intersection, with no formal turn lanes provided on either approach.

Existing traffic conditions

Traffic survey data was collected at three intersections along Irrigation Way on 29/05/2025 between 6:30am and 9:30am, and between 2:30pm and 7:00pm. Survey data indicates there is an average of around 2,238 vehicles per day (two way) over a seven-day period. Bob Irvin Road has an average of 109 vehicles per day (two way) over a seven-day period with a heavy vehicle percentage of 13.9%.

6.6.2 Impacts

The Project and Yoogali Solar Farm will be operated separately and delivered by separate entities, however these entities are working closely together to ensure a coordinated construction and functional outcome.

Construction timeline

Construction is expected to take place over an 18 – 24-month period. Construction personnel and heavy vehicle deliveries are expected to vary significantly during the construction period, though two key peak periods have been identified, during the peak earth works, and for BESS delivery and installation works.

Construction hours are generally to be limited to the following (unless required for specific activities):

- Monday to Friday: 7:00 AM to 5:00 PM;
- Saturday: 7:00 AM to 1:00 PM.

Construction workers

During the typical construction period, the site is expected to accommodate a maximum of 45 staff on-site at a given time. Peak activity is expected to occur during the civil works phase and electrical works phase, with a maximum of 55 and 105 workers expected on site.

Construction traffic generation

During the typical construction period, up to 20 heavy vehicle deliveries are expected per day with the timing of these deliveries distributed throughout the day. In the peak of the construction period, 110 to 170 light and 30 to 100 heavy vehicle movements are expected at the Project Site daily. The anticipated daily traffic generated by the Project is illustrated in Table 28.

Table 28 – Anticipated daily traffic movements

Stage	Light Vehicles	Buses	Heavy Vehicles	Total
Typical Construction	110	0	40	**150**
Civil Works Peak	130	0	100	**230**
Electrical Works Peak	170	8	30	**208**
Typical Operation	10	0	0	**10**
Annual Inspections	20	0	4	**24**

The majority of heavy vehicle deliveries are expected to be via rigid trucks, semi-trailers and tandem tipper and trailers (truck and dogs). Other heavy vehicles that will require occasional access are low loader trailers and B-Double's (BD). The largest vehicles that will access the site will be OSOM vehicles approximately 37 metres in length associated with the delivery of the Main TX, and switch room / control room buildings. It is expected that a maximum of 5 OSOM vehicle deliveries will occur over the course of the construction of the Project. The OSOM vehicles are considered 'high risk' as they meet the height and rear overhang criteria, however no escort vehicles for daytime and nighttime travel are required.

Access Route

Construction vehicles and deliveries will likely originate from the Port of Melbourne, Port Botany, Port Kembla and other locations in New South Wales, Victoria and South Australia. The greatest constraint to site access in the Irrigation Way / Bob Irvin Road intersection. The swept path assessment indicates that heavy vehicle movements for vehicles larger than or equal to 19m semi-trailers, including OSOM delivers cannot be comfortably accommodated without modifying the intersection. Due to the proximity of the irrigation channel, such upgrades would be highly complex and limited to short seasonal windows.

OSOM route

The origin location for OSOM vehicles has not been finalised at this early stage, however Port Kembla, Wollongong is the most likely origin location. Figure 15 illustrates the proposed OSOM route and a full OSOM route assessment is included in the Traffic Impact Assessment (Appendix K). Two pinch points along the route have been identified requiring further investigation to confirm if clearance heights are sufficient.

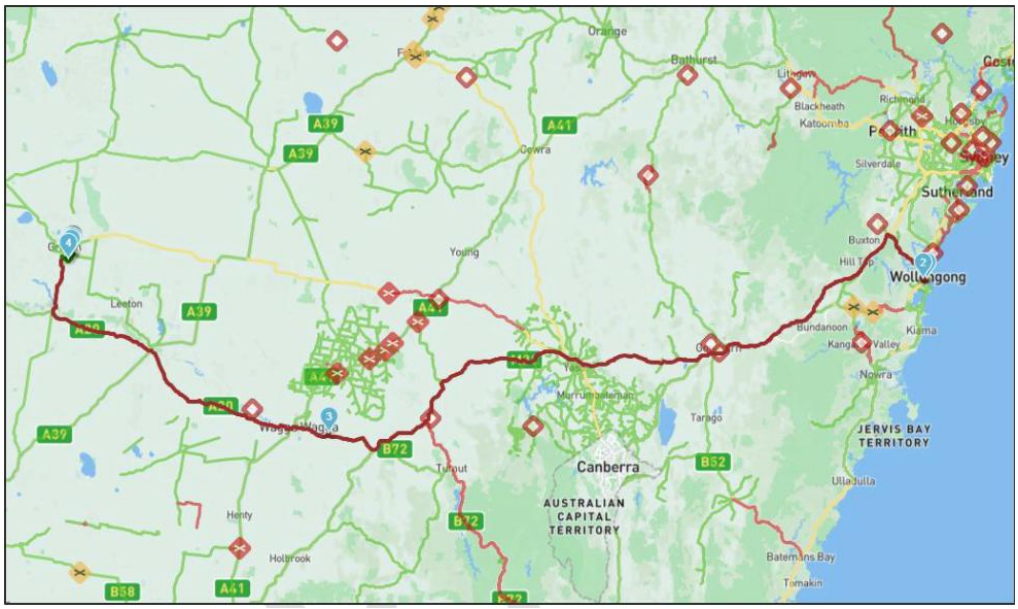


Figure 15 – Proposed OSOM Route to Port Kembla (NHVR Route ID 2NZHH-0 v1)

6.6.3 Mitigation measures

The proposed access strategy aims to divert heavy vehicle inbound movements away from the Irrigation Way / Bob Irvin intersection, directing them instead to approach from the south via Hanwood Avenue and Bob Irvin Road. While the Bob Irvin Road / Irrigation Way intersection is not the preferred route for inbound truck movements, it is considered appropriate to provide outbound truck movements. This would reduce the interaction and potential conflict between heavy vehicles on the local roads surrounding the site.

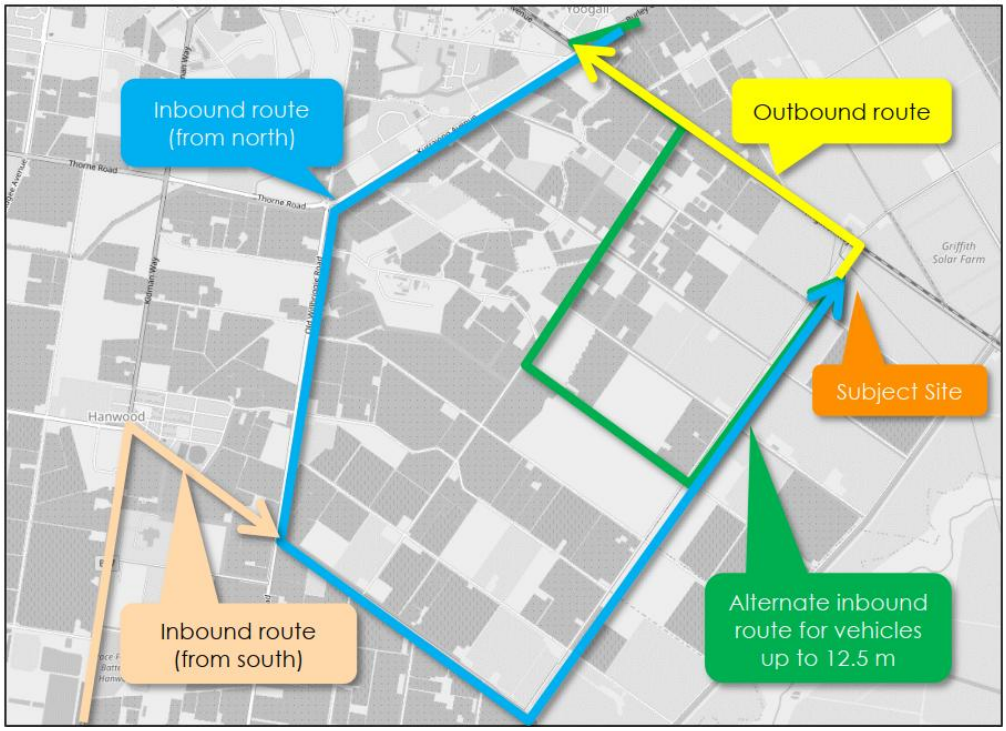


Figure 16 – Proposed vehicle access routes

6.7 Land Contamination and Soil

A Preliminary Site Investigation (PSI) and Contamination Assessment has been prepared by ARC Environmental (Appendix O) in October 2025 to address the Project SEARs within the Key Issue of 'Land'.

Table 29 – Contamination SEARs

Requirement	Relevant Section
Land a preliminary investigation into potential contamination across the site, in accordance with the State Environmental Planning Policy (Resilience and Hazards) 2021 (Hazards SEPP) (as required).	6.7.1
An assessment of the potential impacts of the development on existing land uses on the site and adjacent land, including: ▪ A soil survey to determine the soil characteristics and consider the potential for salinity, acid sulfate soils, and erosion to occur;	6.7.2

The scope of works, beyond the above specification imposed through SEARs, included the following tasks:

- A desktop review of available data in relation to the environmental setting and history of the Site and surrounding areas
- Review of the Yoogali Solar Farm consent conditions and existing plans, to determine any off-site considerations
- Site inspection to confirm results of the desktop review of the Site and adjacent off-Site areas
- Advancement of eight (8) soil bores to a maximum depth of 1.2 metres below ground level (mbgl)
- Description of the soil profile in general accordance with the Unified Soil Classification System (USCS) and other logging procedures, with features such as seepage, discolouration, staining, odours, and other indicators of contamination noted
- Collection of soil samples at near surface, 0.5 mbgl and 1.0 mbgl, as well as at horizons exhibiting visual or olfactory evidence of contamination

- Collection of duplicate samples in separate zip lock bags to screen for volatile organic compounds (VOCs) using a calibrated photo-ionisation detector (PID)
- Laboratory analysis of selected soil samples by a laboratory accredited by the National Association of Testing Authorities (NATA) for the methods used
- Collation and interpretation of the data, including a quality assurance / quality control (QA/QC) data validation process, and preparation of the PSI report.

6.7.1 Existing

The Project Site, and particularly the BESS Area, has a long history as cleared, agricultural land. Over the course of this history, three contaminants of potential concern were identified; being pesticide and herbicide chemicals associated with farming uses, as well as contaminants from an above-ground fuel storage tank just over the southern border of the site. Through the assessment carried out by ARC Environmental, which involved soil sampling, boring and testing, these contaminants were found to be of a negligible level that did not warrant the need for further investigation.

6.7.2 Impacts

Aside from potential contaminants which were measured to be at negligible levels for the purposes of the Project's development and operation, the soil was also assessed for salinity, sodicity and stability.

The salinity of the site is very low for majority of the BESS Area, except for the northern area closer to Irrigation Way. For this portion of the Project Site, higher salinity may pose threat of concrete degradation for infrastructure that is placed within this soil.

Sodicity across the site also increases with depth, which creates risk of dispersion, poor infiltration, and erosion within and around deeper installation or structures.

The soil was also found to be relatively unstable, measured against the Emerson Aggregate Test. This creates a risk of erosion where soil is to be possibly reused across the site.

6.7.3 Mitigation measures

The design of Griffith BESS has considered such soil conditions and as such, proposes an installation that is flat and shallow to avoid sloping and depth that could encounter more sodic soil. Further to this, the following measures when excavating and reusing soil across the site are recommended:

- Avoid development designs that increase the potential for dispersion and erosion of the soil currently in place. For instance, slope batters should not be created with reworked soil from the Project Site.
- Treat the soil from the Project Site, with gypsum or other chemical amelioration methods, if reuse is required for landscaping.

6.8 Hydrology

A Hydrology Assessment has been undertaken by HARC in November 2025 (Appendix M). The purpose of the study is to:

- Assess the existing hydrological and flooding conditions of the site;
- Evaluate potential impacts of the proposed development on local and regional flooding;
- Ensure compliance with Griffith City Council requirements and relevant guidelines; and
- Respond to the applicable SEARs (SSD-85372970) dated 23 June 2025.

The assessment meets the following Project SEARs requirements, primarily within the Water and Soils key issue:

Table 30 – Hydrology SEARs

Requirement	Relevant Section
Water and Soils an assessment of the likely impacts of the development (including flooding and flood modelling) on surrounding watercourses (including their Strahler Stream Order), groundwater resources and surface water movements, and measures proposed to monitor, reduce and mitigate these impacts including water management;	6.8.2
a site water balance for the development;	6.8.2
details of water requirements and supply arrangements for construction and operation (including consultation with suppliers);	6.8.2 Appendix M
a description of the erosion and sediment control measures that would be implemented to mitigate any impacts in accordance with Managing Urban Stormwater: Soils & Construction (Landcom, 2004) and Managing Urban Stormwater: Soils and construction – Volume 2A manual (Landcom, 2008);	6.8.2
assessment of the impacts of the development on hydrology and groundwater (if extraction or interference is proposed), including any changes to overland flows and groundwater levels on-site or off-site, and detail design solutions and operational procedures to manage impacts;	6.8.2
where the project involves works within 40 metres of any river, lake or wetlands (collectively waterfront land), identify likely impacts to the waterfront land, and how the activities are to be designed and implemented in accordance with the DPI Guidelines for Controlled Activities on Waterfront Land (2018) and (if necessary) Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (DPI 2003), and Policy & Guidelines for Fish Habitat Conservation & Management (DPE, 2013); and	n/a – the Project does not involve works within 40 metres of a river, lake or wetlands
identification of any flood risk on site having regard to adopted flood studies, the potential effects of climate change and any relevant provisions of the NSW Flood Risk Management Manual; ▪ where the development could alter flood behaviour, affect flood risk to the existing community or expose its users to flood risk, provide a flood impact and risk assessment (FIRA) prepared in accordance with the Flood Impact and Risk Assessment – Flood Risk Management Guide LU01; ▪ detailed design solutions and operational procedures to mitigate flood risk where required.	6.8.2

6.8.1 Existing

The site is located within the Mirrool Creek Catchment between Mirrool Creek and the Griffith urban area. The Mirrool Creek Branch Canal lies southeast of the site, adjacent to Lot 141, with Mirrool Creek flowing on the opposite side of the canal. The subject property is bordered by open irrigation channels along both its northern and southern edges. Additionally, Main Drain J is positioned to the northwest of the site.

The catchment is known for flooding, and many flood studies have been conducted in this area dating back to 1978.

The Mirrool Branch Canal provides full protection from regional flooding up to the Probable Maximum Flood (PMF) event. As such, the site is only impacted by local rainfall with a very small catchment area.

6.8.2 Impacts

The Project can be developed without adverse hydrological or flooding impacts on neighbouring properties or the broader catchment. Specifically, the Hydrology Assessment found that:

- The Project Site is protected from regional flooding by the Mirrool Branch Canal and associated drainage infrastructure, following development the site remains unaffected by flooding
- An on-site detention volume of 1,210 m^3 is required to restrict developed outflows to pre-development rates for the 1% Annual Exceedance Probability (AEP) event (determined via a Runoff Routing Model (RORB))

- External flooding does not enter the site even under the 0.2% AEP event (determined via a Two-Dimensional Unsteady Flow (TUFLOW) model)
- Runoff from the adjacent Yoogali Solar Farm is able to be managed by directing flows to the existing outfall along the northern boundary
- The Project will generate an additional 13.6 ML/year of runoff, which can be managed via the proposed on-site detention basin and ensure the water balance is maintained (determined via a Model for Urban Stormwater Improvement Conceptualisation (MUSIC))
- Effective erosion and sediment control will be required to prevent environmental degradation during and after construction.
- The site will require water for dust suppression, earthworks, concreting, and amenity use during the construction phase. Potable water will not be sourced from a mains connection, and no new connections are proposed as part of this development. Water will be sourced externally through a licensed private supplier or from Griffith City Council, and imported to site via water tankers. The total construction water demand is expected to be in the order of 20 megalitres (ML) over an estimated 22-month construction period.
- Water consumption for workforce amenities and drinking purposes is estimated at up to 1 kilolitre (kL) per day, based on typical site staffing levels, while approximately 20 kL of water will be required for the initial filling of on-site fire tanks.
- During operation, water use will be limited to the maintenance of on-site amenities and the washing of vehicles and equipment. Potable water will be trucked to site and stored in a 15 kL tank located adjacent to the O&M building.
- Rainwater harvesting will supply water for amenities and other non-potable uses.
- Under normal operation, the project does not anticipate any fire-water use.
- As no connection to mains water is proposed and all water will be supplied externally by licensed suppliers, the project will have negligible impact on local water resources during operation.
- No extraction from surface water or groundwater sources is proposed. Given the modest quantities required and reliance on external supply, no impacts to local surface or groundwater resources are expected.
- Fire protection water will be stored in dedicated tanks designed in accordance with the results of the Fire Safety Study.

6.8.3 Mitigation measures

The following recommendations have been made as a result of the assessment:

- an on-site detention volume of 1,210 m^3 is required to restrict developed outflows to pre-development rates for the 1% AEP event, this will be sufficient to manage the indicated additional runoff and ensure offsite impacts are avoided
- A site specific Erosion and Sediment Control Plan, prepared in accordance with the IECA Best Practice Erosion and Sediment Control manual, will be required to mitigate risks during construction and operation.

6.9 Hazards

A Preliminary Hazards Assessment has been undertaken by Riskcon Engineering in October 2025. Using the Hazardous Industry Planning Advisory Papers (HIPAP) No. 6 and No.4, the assessment meets the following Project SEARs requirements, primarily within the Hazards key issue.

Table 31 – Hazards SEARs

Requirement	Relevant Section
Health an assessment of potential hazards and risks including but not limited to fires, spontaneous ignition, electromagnetic fields for the proposed grid connection infrastructure against the International Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines for limiting exposure to Time-varying Electric, Magnetic and Electromagnetic Fields;	6.9.2
Dangerous Goods A preliminary risk screening completed in accordance with the State Environmental Planning Policy (Resilience and Hazards) 2021.	6.9.2
Battery Energy Storage System A Preliminary Hazard Analysis (PHA) prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guideline for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011). The PHA must consider all recent standards and codes and verify separation distances to on-site and off-site receptors to prevent fire propagation and compliance with Hazardous Industry Advisory Paper No. 4, Risk Criteria for Land Use Safety Planning (DoP, 2011). The PHA must consider the effect of bushfires on batteries or other components of the BESS.	6.9.2

6.9.1 Existing

The area around the site was not assessed as posing hazard to the development of the Project.

6.9.2 Impacts

6.9.2.1 Dangerous goods

Lithium-ion is classed as a Class 9 Dangerous Good by the Australian Code for the Transport of Dangerous Goods by Road and Rail. As such, there is risk of thermal runaway which can then heat the battery to the point of combustion and explosion.

6.9.2.2 Battery fire and ignition

With any lithium-ion battery, there are still several degradation processes that can occur to cause thermal runaway. These effects arise primarily as a result of high discharge, overcharging, or water ingress into the battery which results in a host of by-products being formed within the battery during charge and discharge cycles.

The Project has selected a battery with a Lithium-ion phosphate chemistry, considered to be one of the safest battery chemistries within the industry. While there is still a level of risk of combustion, the LFP technology combined with each battery container's fire protection devices makes thermal runaway fire unlikely.

In the unlikely event of fire, there is a chance of toxic gas dispersion, should the BESS modules be affected. In such case, even under the worst conditions with high-speed wind, the safe distance from the battery is 54m. This is therefore considered a low impact scenario, given the distance of any sensitive receptors to the BESS Area as well as the dilution that occurs as distance increases to emitted gases.

6.9.2.3 Electromagnetic fields

There is a level of Electric and Magnetic Fields (EMFs) created by the installation of a BESS, whereby transmission lines, transformers and the electrical components found within BESS units are all able to produce EMFs in the range of 30 to 300 Hz. Even considering the new infrastructure to be installed amongst existing transmission lines and the Griffith Substation, the BESS Area would not exceed the 2,000 mG limit for prolonged exposure. Additionally, the closest residence is over 500 m away from the EMF generating sources at the BESS; hence, the potential for the EMF to exceed the accepted levels is considered negligible.

6.9.3 Mitigation measures

The following recommendations have been made as a result of the assessment:

- BESS to be installed in accordance with manufacturer specifications, UL9540A report and LSFT recommended clearances based on testing.
- BESS to be installed with fire protection systems specified by the manufacturer and UL9540A report.
- Before construction, detailed design (noting any relevant conditions from the Fire Safety Study and Emergency Plan) to validate the system can be installed in the project area whilst meeting the recommended clearances of the manufacturer and test results.
- UL testing information shall be made available to the certifying authority.
- The vent covers of the BESS shall be constructed of non-combustible material.
- The vents shall not be located above battery packs within the BESS container.

6.10 Bushfire

A Bushfire Assessment Report (BAR) report (Appendix Q), prepared by Cool Burn Fire + Ecology in September 2025, meets the specified to assess Bushfire as a Hazard within the Key Issues of the SEARs as follows:

> *Bushfire – a bush fire hazard assessment completed by a suitably qualified consultant and identify potential hazards and risks associated with bushfires / use of bushfire prone land including the risks that a BESS would cause a bush fire and demonstrate compliance with Planning for Bush Fire Protection 2019.*

The scope of the BAR, beyond addressing the above SEARs, included:

- Describing the existing environment and consider the suitability of the site with respect to bushfire
- Assessing the impacts of constructing and operating the project on bushfire risk
- Considering the potential for cumulative impacts with other localised development including the Yoogali Solar Farm
- Recommending measures to mitigate and manage the impacts identified
- Working in compliance with the NSW *Planning for Bushfire Protection* (2019) (PBP) publication.

6.10.1 Existing

The Project is located within the Northern Riverina Fire Weather District, which yields a Fire Danger Index (FDI) result of 80. This is favourably lower than other regions, such as the Greater Hunter, which scores 100 against the index. Across the region, bushfire season typically spans October to March with extreme danger periods in January and February. The region also records a Grassland Fire Danger Index of 110.

The Griffith LGA has no history of recorded significant fire events, with the exception of smaller grass fires that may not have been recorded. Despite this, the Project Site includes areas of moderate risk Category 3 Bushfire Prone Land (BFPL) and vegetation buffers.

6.10.2 Impacts

The risk profile of the Project Site, as it currently exists, has been assessed as unlikely to be altered by the operation of Griffith BESS. This is attributable to the flat, cleared nature of the land. The Grassland classified vegetation is expected to be reduced from the construction of the Project, further limiting ignition risk. In accordance with Appendix 1 of the PBP (2019), all areas surrounding the site except for the road/rail reserves and Griffith Substation have been assessed as Grassland.

With the ongoing threat of climate change, days of fire danger could be expected to increase. This could result in the Project existing in an environment that is more susceptible to bushfire of its operational life. Consideration has been taken in the mitigation measures to not only adhere to the PBP (2019), but also to provide a level of mitigation management that exceeds the requirements for today's conditions.

6.10.3 Mitigation measures

The following mitigation measures have been designed to comply with the specifications and requirements set out in Section 8 of PBP (2019). They are intended to be effect for the life of the Project.

- Establishment of an Asset Protection Zone (APZ) around the BESS Area at a minimum distance of 10 m to achieve a bushfire attack level (BAL) of 29 or below. During the construction phase, an APZ will also be established around all temporary construction buildings, also at a 10m buffer.
- Within the APZ buffer, the Inner Protection Area (IPA) should be landscaped as follows to minimise rate of spread and general fire intensity:
    - Total tree canopy will not exceed 15%, with planting and overhang away from structures.
    - Shrubbery should not form more than 10% ground cover and must not be planted under trees.
    - Grass is to be kept mown or slashed.
- During the construction period, safe access must be maintained with the public road system, accompanying a dedicated emergency and evacuation plan for all workers on site. Any temporary structures will not be constructed from non-combustible materials.
- All internal roads are to be at least 4 m wide, and an internal road is to be constructed around the BESS Area within the IPA. The secondary access from Bob Irvin Road must be connected to the internal track network.
- A minimum 20,000L Static Water Supply (SWS) is to be installed prior to construction. The SWS, for RFS use, will be fitted with a 65mm Storz outlet and will have a hard ground surface for access up to 4 m.
- A Construction Environmental Management Plan (CEMP) must be prepared with requirements for hot works permits, 24-hour emergency contact details, location of hazards, situation awareness and evacuation planning, and storage/handling of hazardous/flammable materials. This can also be accompanied by a Pre-incident Plan (PIP) which provides emergency services with key locations on-site for bushfire management.

6.11 Social and Economic

A Social and Economic Impact Assessment (SEIA) has been prepared by Lecroma Pty Ltd (Appendix J) in alignment with the social impact assessment (SIA) phase of the SIA process as outlined within the *Social Impact Assessment Guideline for State significant projects* (NSW DPHI, 2025). It also integrates Lecroma's established evaluation framework based on the Sustainable Livelihoods and Resilient Communities approaches. Through this assessment, the following two Key Issues of the Project SEARs have been addressed:

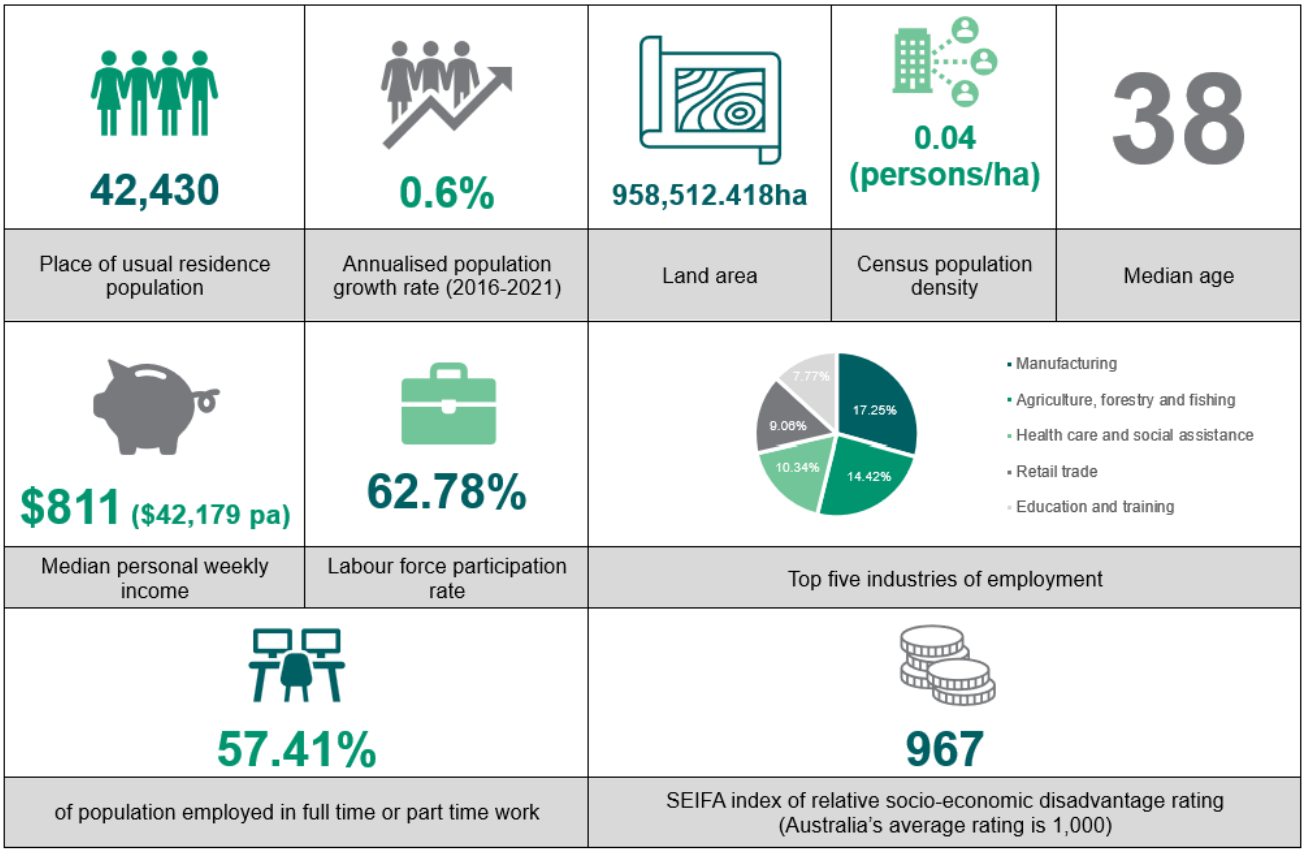
- **Social** – including an assessment of the social impacts or benefits of the project for the region and the State as a whole in accordance with the Social Impact Assessment Guideline (DPE, 2023), including consideration of any increase in demand for community infrastructure services, and consideration of construction workforce accommodation.
- **Economic and Benefit-Sharing** – including an assessment of the economic impacts or benefits of the project for the region and the State as a whole and provide details of any proposed voluntary benefit sharing, having regard for the Benefit-Sharing Guideline 2024 and Private Agreement Guideline 2024.

The assessment was informed by a combination of desktop research, field engagement by specialists, and primary consultation with community members, local stakeholders, and government representatives. It establishes a detailed social and economic baseline and applies impact prediction, evaluation, and management processes to ensure potential risks are addressed, and local benefits are maximised.

6.11.1 Existing

As an initial component of the SIA, the social locality of the Project was defined as those who reside in towns within a 60-minute drive of the Project. Beyond these towns, the Project Site and the Yoogali locality is the centrepiece, and any primary transport routes within this area is also considered.

Figure 17 – Key demographic data for the social locality (shows key profile data for the social locality, including demographic, industry and employment data. Being primarily defined by a 60-minute drive from the project area, the social locality boundary cuts through several towns, which is accounted for in the statistics in Table 14.



Source: ABS 2021 Census Population and Housing, REMPLAN 2025

Figure 17 – Key demographic data for the social locality (Appendix J)

6.11.1.1 Key insights and trends

6.11.1.1.1 Griffith and neighbouring LGAs

Griffith LGA is a growing, youthful community with a diverse economy (manufacturing, agriculture, construction), strong local infrastructure, and a rich natural and cultural heritage. The area faces challenges of housing availability and affordability, health care access, cost of living and retaining young people, but sees opportunities related to employment, multiculturalism, events and liveability (Griffith City Council 2025).

Griffith LGA, and the neighbouring LGAs of Murrumbidgee (population 3,353), Carrathool (population 2,866) and Leeton (population 11,452) are likely to be the place of residence for some future employees. They are also likely to be the base of companies that provide construction and operation stage goods and services for the project. Griffth town centre and hubs within these other LGAs are also likely to experience some social impacts including transport impacts and noise or rural amenity impacts.

6.11.1.1.2 Yoogali township

Yoogali has a small, stable population, strong agricultural identity, limited but valued social infrastructure, and is reliant on the nearby regional town of Griffith as an important hub for social connection, infrastructure and commercial services, employment, active recreation, and industrial manufacturing.

The local community is likely to identify with both the opportunities and challenges presented by this Project. Neighbours may be sensitive to any increases in traffic volumes or heavy-vehicle movements along the Project route. They may also experience noise, dust and visual impacts during construction. Because of the location of the Project within an existing approved solar farm, long-term visual impacts are expected to be minimal.

The proposed Project is expected to generate approximately 150 FTE construction jobs and 2.5 FTE operation jobs. Yoogali's small economic base and dependence on surrounding centres for paid work may shift if the community can capitalise on the opportunity to increase local hiring and diversify employment pathways for residents who currently rely on external labour markets.

6.11.2 Impacts

6.11.2.1 Social Impacts

Lecroma identified 16 potential impact themes across several social impact categories including 'livelihoods', 'way of life', and 'community'. Impacts were evaluated for significance using a structured matrix, considering likelihood, magnitude, and sensitivity. Table 32 – Evaluated significance of social impacts shows the potential impacts and their evaluated significance.

Table 32 – Evaluated significance of social impacts

Impact	Social impact category	Evaluated significance
1. Economic benefits for the social locality and region	Livelihoods	Very high
2. Electricity reliability and prices	Livelihoods	Very high
3. First Nations people and culture	Culture	High
4. Accommodation and housing	Way of life; Community	High
5. Temporary population changes	Community; Way of life	Medium
6. Roads and traffic	Accessibility; Way of life	Medium
7. Landscape character and visual amenity	Surroundings and social amenity	Medium
8. Land use and rural livelihoods	Livelihoods	Medium
9. Noise and light pollution	Surroundings and social amenity	Medium
10. Fire and other hazards	Surroundings and social amenity	Low
11. Community cohesion and mental well-being	Community	Low
12. Land values and insurance	Livelihoods	Low
13. Waste and decommissioning	Surroundings and social amenity	Low
14. Biodiversity / ecological	Surroundings and social amenity	Low
15. Flood and storm water risk	Surroundings and social amenity	Low
16. Contamination / soil	Surroundings and social amenity	Negligible

Of the 16 identified potential social impacts, most are manageable with mitigation. Two are evaluated to be of 'very high' significance, with two considered to be of 'high' significance, five 'medium' significance, six 'low' significance, and one of 'negligible' significance.

The construction stage will temporarily increase the local population, likely affecting housing, services, and local roads and traffic. While these pressures are expected to be short-term, proactive engagement, local workforce participation, and accommodation planning are recommended to minimise disruption.

Conversely, the Project offers opportunities for local employment, skill development, and procurement. Its long-term operational presence will reinforce the area's role in the renewable energy transition, fostering pride, resilience, and economic diversification. Several impacts were rated as 'low' to 'medium' significance due to the site's strategic co-location within existing infrastructure.

6.11.2.2 Economic Impact

The economic impact assessment shows the Project is expected to contribute positively to both the regional and NSW economy in both the construction and operation stages.

The Project capital expenditure that is directly attributable to the BESS construction comprises the works agreement costs (35.51%) and supply agreement costs (64.49%). The economic impact modelling was done through an input-output model derived using REMPLAN (an online analytical tool and information resource for economic development and planning), with a multiplier effect. The model was developed using the total number of FTE jobs that the Project is expected to create in the construction and operation stages. Three scenarios were developed for economic impact modelling based on workforce sourcing zones: conservative case, base case, and optimistic case, and were applied in the construction stage analysis.

During the construction period, with modelling undertaken by REMPLAN, the Project injects significantly into the regional and broader NSW economies through the following effects:

- Direct effect – direct spending by the Project
- Supply-chain effect – businesses who have been employed by the Project spend on their suppliers to meet the Project's needs
- Consumption effect – spending of the incomes generated by the previous two effects.

The Project is expected to have a negligible economic impact on the agriculture sector, but is likely to create other positive economic impacts such as supporting grid stability and peak-price reduction (arbitrage), contributing to energy efficiency and economic value, maintaining air quality and health benefits which reduces the burden on the healthcare system and thus benefits the wider economy, and enhancing fiscal flows, skills, and industry development.

A cost-benefit analysis of the Project was conducted using agriculture as an alternative land use for the project area. While the site has not been cropped for a long time, it was formerly used for irrigated cropping, with an estimated return of $8,600 per annum. This value was considered as the opportunity cost of using the proposed land for the Project instead of using it for agriculture. This opportunity cost was used to assess the impact on the regional and NSW economy, during the project construction and operation period if the project area were used for agriculture. The analysis indicates that the Project will generate a larger overall positive economic impact than if the project area is used for agriculture.

Early engagement with Griffith City Council, local not-for-profit organisations, GLALC, and local education and employment providers has ensured the project team understands the needs and aspirations for building social and economic value in Griffith. As a result of conversations throughout the planning stage of the Project, the Proponent seeks to increase the overall benefit sharing commitment from the Project. Further to the LDS LTESA Social Licence Commitments, the Proponent is discussing opportunities to align the Project's total funding for benefit-sharing with the DPHI *Benefit-Sharing Guideline for large-scale renewable energy projects*.

6.11.3 Mitigation measures

Lecroma notes the Proponent's stakeholder engagement program has demonstrated a clear commitment to building social licence and responsive project development. Feedback from the community and Council has shaped mitigation measures, benefit sharing commitments, and the ongoing engagement plan for the construction and operational stages.

Key insights from engagement included strong local interest in job creation, supplier opportunities, and visible benefit-sharing; concerns about fire risk, land use, and battery safety; and a desire for long-term transparency and communication. Feedback directly influenced mitigation planning, the design of community benefits activities, and ongoing communication strategies.

Lecroma's SEIA sets out six key recommendations supported by specific actions designed to enhance positive outcomes and mitigate negative social impacts identified throughout the assessment.

The recommendations are:

1. Incorporate recommendations from independent technical assessments to refine project design and implementation
2. Implement benefit sharing commitments, including the LDS LTESA social licence commitments and additional funding or other commitments
3. Develop and implement a Workforce Accommodation Plan, if deemed necessary by Council
4. Develop and implement a Local Content Plan to help deliver on local content commitments made under the LDS LTESA
5. Continue consultation with key stakeholder groups throughout the life of the Project
6. Regularly review strategy and implementation of Community and Stakeholder Engagement Plan throughout the life of the Project.

Residual negative social impacts, once mitigation and enhancement measures are applied, are expected to be 'low' to 'negligible' for most categories, except for impacts related to First Nations people and culture, accommodation and housing and temporary population changes, which may persist at a 'medium' significance level. For the two positive social impacts evaluated to have a 'very high' significance, the predicted residual impact after enhancement measures is forecast to remain 'very high'.

For this Project, Lecroma noted that a Social Impact Management Plan is not considered necessary because the SEIA identified that social impacts were minor to moderate, predictable, and effectively addressed through existing mitigation and engagement measures. The assessment demonstrated that social risks could be managed through the ongoing engagement framework, benefit sharing commitments, and monitoring mechanisms already incorporated into the project design.

However, for ongoing engagement, and for the four most significant social impacts, the SEIA sets out an adaptive Monitoring, Evaluation, Reporting, and Learning Framework to track project performance, community sentiment, and social outcomes throughout the project lifecycle. A Complaints Management Process will ensure all community concerns are logged, addressed promptly, and reviewed to inform continuous improvement.

The SEIA concludes that the Project is likely to generate substantial local and regional benefits while presenting manageable social risks. Overall, the SEIA finds that with effective implementation of mitigation, enhancement, and engagement strategies the Project can deliver net positive social and economic outcomes for Yoogali and the wider region, outperforming the site's former agricultural use. Success will rely on ongoing transparency, proactive management, and collaboration with stakeholders throughout the project lifecycle.

6.12 Waste

A Waste Management Plan (Appendix L) was prepared by One Mile Grid in response to the SEARs (Table 33) and summarised in this section. The plan was prepared with due consideration of the *NSW Waste and Sustainable Materials Strategy 2041* and relevant Council documentation.

Table 33 – Waste SEARs

Requirement	Relevant Section
Waste Identify, quantify and classify the likely waste stream to be generated during construction, operation, and decommissioning, and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste (in consultation with waste facilities, including Council)	6.12.2

6.12.1 Existing

As rural land, the site has no existing waste considerations relevant to the Project.

6.12.2 Impacts

The Project will generate waste during construction, operation and decommissioning. The following table summarises the expected waste streams during these phases.

Table 34 – Expected waste stream

Construction	Operation	Decommissioning
excavation spoil, concrete, metals, plastics, packaging	general garbage and commingled recyclables	electrical components, including batteries, transformers, and cables

The Waste Management Plan provides greater detail relating to the quantity of waste from each stream and across phases and provides proposes approaches to waste management implementation to avoid impacts.

6.12.3 Mitigation measures

The Management Plan recommends the following general measures:

- Reduce and avoid waste generation through improved resource efficiency measures and industrial ecology partnerships
- Separate recycling streams at source to enable collection separate from residual waste
- Work with suppliers to reduce packaging and waste in supply chains
- Implement and maintain best practice resource recovery systems
- Actively seek other businesses that may use your waste as an input material in their business
- Ensure that waste streams are collected by legitimate operators and taken to appropriate facilities
- Specify and purchase recycled materials
- Work with other producers to take responsibility for the end-of-life management of problem wastes
- Ensure all staff and stakeholders are aware of their responsibilities with regard to waste and bin management; and
- Comply with regulations, including the SafeWork NSW – Codes of Practice.

6.13 Cumulative impacts

This section of the EIS considers the cumulative impacts of the proposed development with other planned or future developments in the locality. The Project is located in an area where there is a notable number of new renewable energy developments that are proposed, approved, under construction or seeking expansion. These developments are expected to bring substantial investment in communities and job opportunities in the region. However, the scale and cumulative impacts of the new development in the Riverina Murray region can impact on communities and the environment during construction and operation.

It is important to note that not all proposed developments would be constructed or become operational, nonetheless, this cumulative impact assessment has considered all reasonable cumulative impacts of the Project.

6.13.1 Assessment methodology

The level of assessment and type of assessment required for each key matter assessed was based on the scale and nature of the potential cumulative impacts, available information in publicly available planning documents and uncertainties associated with each relevant future development. Where construction timeframes are not known, predictions have been made about the likelihood of overlapping construction periods, based on the most current and publicly available information at the time of writing this EIS.

Within the NSW *Cumulative Impact Assessment Guidelines for State Significant Projects,* four incremental assessment approaches are outlined to apply to different key issues that are being investigated. These are:

- Incremental assessment – assessment of direct project impact on existing condition of a key issue.
- Combined incremental assessment – assessment of the project's specific overall impact on existing condition of the environment.
- Issue-specific Cumulative Impact Assessment (CIA) – assessment of cumulative impact on a specific key issue given the project and potential for future projects.
- Combined CIA – assessment of the combined cumulative impact on all key issues, given the project and potential for future projects.

From the Project SEARs, as well as in alignment with the definition provided with the NSW *Cumulative Impact Assessment Guidelines for State Significant Projects,* the following have been identified as **key matters** for assessment for the Project:

- Biodiversity (SEARs)
- Land use (SEARs)
- Noise (SEARs)
- Traffic & Transport (SEARs)
- Landscape & Visual (self-identified)
- Bushfire (self-identified)
- Social & Economic (self-identified)

For each key matter, issue-specific CIA has been undertaken and findings are presented in the following sections. The Project has then been assessed under the combined CIA methodology, considering all of these cumulative impacts on key matters.

The following matters were not considered further in this assessment given the potential impacts would be localised and minor or where there is no potential overlap:

- Aboriginal heritage
- Historic heritage

- Hydrology
- Hazards (excluding bushfire)
- Soil and Land Contamination

6.13.2 Developments in the region

There are several renewable energy projects within the region, at differing stages of the approval process. It is anticipated that there will be additional renewable energy projects proposed in the vicinity of the Project Site that are not known at the time of preparing this report. At this time, the closest renewable energy developments to the Project are described in Table 35 and those within a 1km radius of the Project Site are shown in Figure 18.

Table 35 – Nearby Renewable Energy Projects

Project Name	Project Type and Capacity (MW/MWh)	Status	Distance to Project Site	Developer
Griffith Solar Farm (SSD 6604)	36 MW Solar farm	Operational	~600 m Northeast	Neoen/Bouygues-Construction
Riverina Solar Farm (SSD 7482)	40 MW solar farm	Approved – Pre-construction	~500 m Northwest	Suntech/EPS Energy
Yoogali Solar Farm	15 MW solar farm	Approved – Seeking modification	Shared property	EDP Renewables
Hawkins Road Solar Farm	4.95 MW solar farm Sub 5 MW BESS	Approved – modification approved	1.2 km southeast	ACE Energy
Yanco Solar Farm	72 MW solar farm	Approved – Pre-construction	40 km southeast	Origin Energy
Woodlands BESS	200 MW/800 MWh BESS	Approved – Pre-construction	37 km south	Risen
Darlington Point Solar Farm	333 MW solar farm	Operational	38 km south	Edify
Yanco BESS	250 MW/1100 MWh BESS	With DPHI for determination	40 km southeast	ACEnergy
Comet Park BESS	150 MW/600 MWh	Planning – preparing EIS	42 km southeast	Samsung C&T Renewable Energy Australia
Boags Creek Solar Farm	300 MW solar farm	Planning – preparing EIS	40 km south	Edify

The Griffith area, as a key regional centre in the Riverina Murray region, is host to other SSD proposals related to core industry and infrastructure of the city. These are described in the below Table 36. Although these identified are not in the same electricity generation and supply industry as the Project, awareness of other SSD proposals is vital in consideration of cumulative impacts of the Project.

Table 36 – Nearby SSD Proposals

Project Name	Project Type	Status	Distance to Project Site	Developer
De Bortoli Winery	Winery	Operational	6 km north	De Bortoli Wines Pty Ltd
McWilliams Winery Expansion Project	Winery	Operational	7 km southwest	McWilliam's Wines Pty Ltd
Griffith Bio-hub	Bioenergy facility	Planning – Preparing EIS	9 km southwest	Optimal Renewable Gas
Riverina Bioenergy Facility	Bioenergy facility	Planning – Preparing EIS	9 km southeast	Valorify

Project Name	Project Type	Status	Distance to Project Site	Developer
Griffith Private Hospital	Hospital	Operational	8 km northwest	St Vincent's
Griffith Base Hospital Redevelopment	Hospital	Construction	8 km northwest	NSW Government

Of these identified related and non-related SSD developments across the broader region, the **Yoogali Solar Farm**, **Riverina Solar Farm** (SSD 7482) and **Hawkins Road Solar Farm** (DA 189/2023.2) have been considered most relevant for the purposes of cumulative impact assessment (CIA). The other renewable energy SSD projects in the region are at different stages of the SSD process to the Project as well as their distance being considered beyond the scope of what may incite causally linked impact on the key matters.

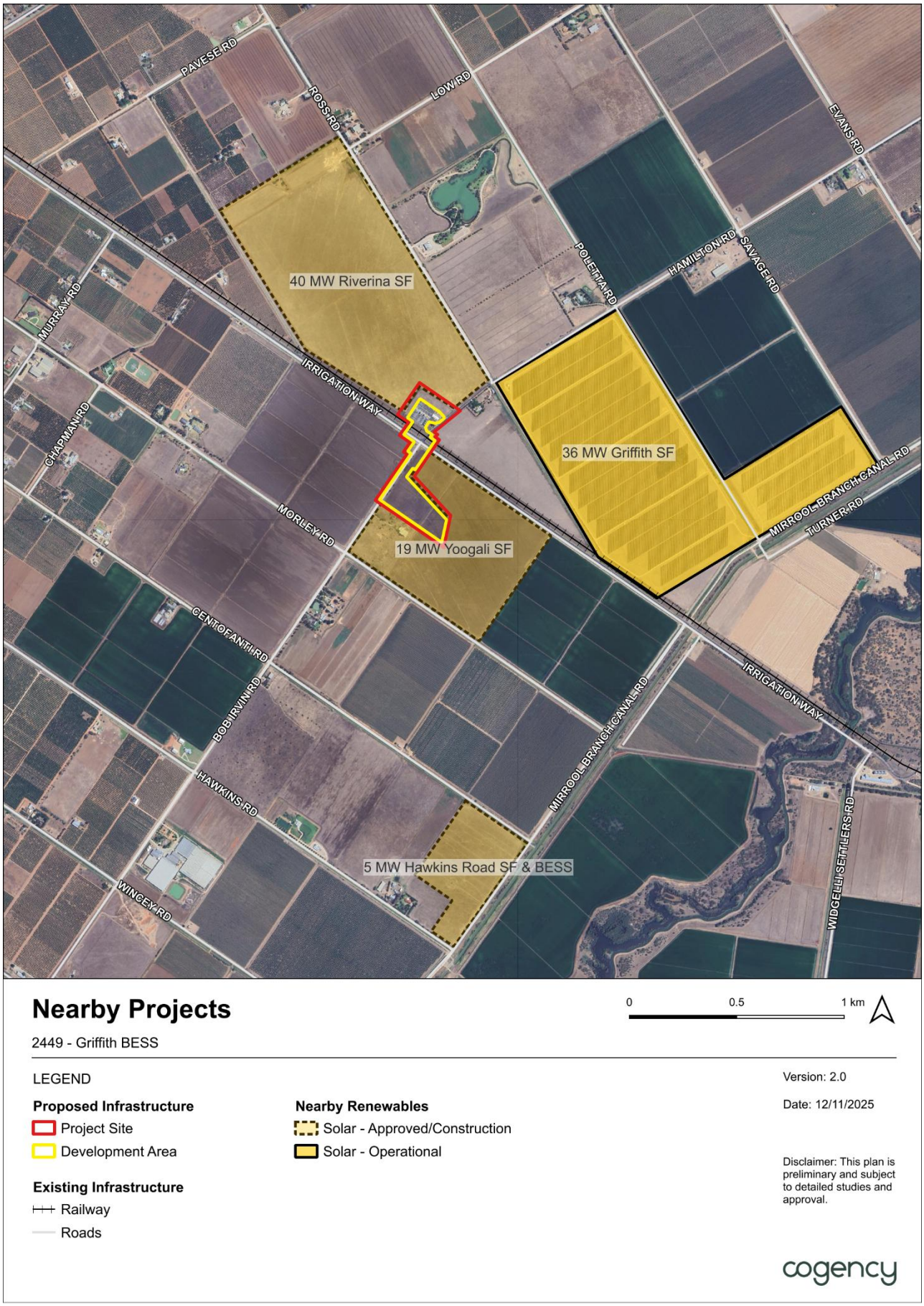


Figure 18 – Nearby projects plan

6.13.3 Issue-specific CIA

6.13.3.1 Biodiversity

There are no proposed impacts to native vegetation and the Project not likely to have a significant impact on biodiversity values due to the Project Site's highly disturbed condition. Therefore, the Project will not result in cumulative impacts.

6.13.3.2 Land use

Across the Griffith LGA and the vicinity of the Project, there are several renewable energy SSDs and regional developments (RD) that are operational, in planning, or under construction. Each of these occupy relatively small areas given the mass of irrigation land across the municipality, and amounts to use of approximately 0.2% of the current irrigation land available in the Griffith LGA.

Given the small footprint of the Project, the cumulative impacts on agriculture in the region arising from the Project being constructed and operated near other major projects would be minor. The land has already been reserved and approved for use as a solar farm and therefore, the Project is not reducing the amount of active agricultural activity in the region. Further, impact on existing surrounding agricultural activity is expected be minimal.

6.13.3.3 Noise

Cumulative noise is addressed within the Noise Policy for Industry through amenity noise levels. The recommended amenity noise level during the evening is 45 dB LAeq, 15 min for rural residential receivers.

Where the solar farm infrastructure is not operating, as would be the case for a majority of the night period, cumulative noise levels would be driven by the Project and Griffith Substation only, resulting in cumulative noise levels in the order of 35 dB LAeq, 15 min.

The road traffic noise assessment considered Project only and cumulative scenarios, finding no negligible difference in the results.

Based on the above, it is expected that the intent of the Noise Policy for Industry with respect to cumulative industrial noise is satisfied and the risk of cumulative noise impact is not significant.

6.13.3.4 Traffic and Transport

An assessment of the three closest developments determined the key project with the potential to produce cumulative traffic impacts is the Yoogali Solar Farm, which is to be delivered concurrently with the proposed development.

Given the low likelihood of the Riverina Solar Farm being constructed, and the differences in access routes, the Riverina Solar Farm project is not anticipated to generate cumulative impacts.

The resultant cumulative traffic impacts of the Yoogali Solar Farm which proposes to utilise the same routes, and the Hawkins Road Solar Farm is an increase in vehicle movements during the peak construction phase from 83 to 124 movements. However, due to the temporary and tidal nature of construction traffic, the low traffic speeds, and that the Irrigation Way / Bob Irvin Road intersection is not proposed to be used for inbound traffic movements, no intersection upgrades or road widening works are required.

It is recommended that the pavement on the side of Bob Irvin Road is monitored to identify if any maintenance is required during or after completion of the construction phase. This process may be supported through the preparation of a pre-construction condition report and a post-construction dilapidation report. Overall, the level of traffic generated is expected to have a minimal impact on the operation of the external road next work.

6.13.3.5 Landscape and Visual

The LVIA considered cumulative landscape and visual impacts in terms of sequential cumulative impacts and simultaneous visuals impacts:

- Sequential cumulative impacts: expected to be limited as the Project will likely appear as an extension of the existing Griffith Substation and the operating Griffith and approved Yoogali and Riverina solar farms. While a 750m long section of Irrigation Way would have energy infrastructure located on both sides of the road, this would equate to approximately 27 seconds when travelling at 100km/h
- Simultaneous cumulative impacts: expected to be minimised as a result of the Project being 'indented' within the approved Yoogali Solar Farm, removing the perception that the Project is further surrounding sensitive viewpoints.

No additional amelioration is required to respond to cumulative impacts and no residual impacts remain.

6.13.3.6 Bushfire

There is the potential for cumulative impacts on bushfire risk to occur from an increase in solar energy generation and storage in the locality due to the Griffith BESS, the Yoogali Solar Farm, and the Griffith Solar Farm. However, seeing as these projects have all progressed through the applicable planning process, it can be assumed that all will have considered bushfire risk as well as being designed in adherence to PBP (2019).

During construction periods, traffic management will ensure the safe access to work sites as required. The potential for overlap of construction periods is still unlikely to overwhelm the road network and restrict access of emergency services and egress from the area.

The positive mitigation techniques planned for the Project, combined with an increased level of site observation may also aid in earlier detection and mitigation of bushfires in the immediate region. As such, the risk profile of the location of the BESS is unlikely to be significantly altered by the construction and operation of the BESS.

6.13.3.7 Social & Economic

The Social and Economic Impact Assessment details the potentially positive and negative cumulative impacts of the Project. The assessment acknowledges that regional projects create opportunities for local and regional workforces, attract skilled workers and families, reduce outmigration to cities, and boost labour force participation. They can revitalise inland regional economies that have struggled under globalisation and structural adjustment.

However, rapid policy-driven growth in renewable energy projects may also push up construction wages, divert workers from other sectors, and raise costs as firms pass wage pressures to consumers. These impacts will depend on the labour mix drawn from within regions, externally, or via DIDO/FIFO arrangements, as well as broader market adjustments. Short-term pressures may also extend to inputs like quarry materials and concrete, driving up prices and creating shortages for other industries.

In sum, there is a complex picture of potential cumulative impacts to consider given the unique local and large scale of renewable energy generation projects proposed. On balance, these impacts have the potential to be transformative for the social locality and region in more positive than negative ways, pending how successfully the proposed impact management measures are implemented.

Most potential impacts identified for this Project are also of a cumulative nature and therefore cannot be addressed by the Proponent in isolation. Responsibility to address these impacts will fall collectively to numerous proponents developing projects in the Griffith LGA and surrounds, alongside the NSW Government, to develop appropriate strategies to manage, mitigate and/or enhance identified impacts.

6.13.4 Combined CIA conclusions

Given cumulative impacts of the Project are largely anticipated to be negligible, with the exception of some potential cumulative social and economic impacts.

Social and economic impacts are complex, with the potential to be transformative for the social locality and region in more positive than negative ways, pending how successfully the proposed impact management measures are implemented.

Therefore, the Project would result in a negligible contribution to combined cumulative impacts with other developments. That is, there would be negligible contribution to combined effects of different issue-specific cumulative impacts that would affect a particular population, environmental area or location.

7. Justification

This section provides a justification of the Project as a whole, evaluating the suitability of the Project, key impacts, engagement and cumulative impacts discussed in this EIS.

This section seeks to address the following SEARs EIS requirements in some or full capacity:

- *consistency in information presented in the EIS and all technical reports, including distances, development footprint, project design and infrastructure proposed, construction timeframes and receiver numbers*
- *an assessment of the likely impacts of the development on the environment, and any other significant issues identified in the above risk assessment, focusing on the specific issues identified below, including:*
  - *a description of the existing environment likely to be affected by the development using sufficient baseline data;*
  - *an assessment of the likely impacts of all stages of the development (which is commensurate with the level of impact), including any cumulative impacts of the site and existing, approved or proposed developments in the region and impacts on the site and any road upgrades, taking into consideration any relevant legislation, environmental planning instruments, guidelines, policies, plans and industry codes of practice including the Cumulative Impact Assessment Guideline (DPE, 2022);*
  - *a description and assessment if staging of the project is proposed including any site mobilisation or pre-construction works;*
  - *a description of the measures that would be implemented to avoid, mitigate and/or offset the impacts of the development; and*
  - *a description of the measures that would be implemented to monitor and report on the environmental performance of the development;*
- *a detailed evaluation of the merits of the project as a whole, having regard to:*
  - *the requirements in Section 4.15 of the EP&A Act, including the objects of the Act and how the principles of ecologically sustainable development have been incorporated in the design, construction and ongoing operations of the development;*
  - *the suitability of the site with respect to potential land use conflicts with existing and future surrounding land uses;*
  - *feasible alternatives to the development and its key components, including siting and project design alternatives to avoid areas of biodiversity value and high archaeological sensitivity, opportunities for shared infrastructure with proposed developments in the region, and the consequences of not carrying out the development; a detailed consideration of the capability of the project to contribute to the security and reliability of the electricity system in the National Electricity Market, having regard to local system conditions and the Department's guidance on the matter.*

7.1 Design of the Project and site suitability

The Griffith BESS is appropriately located to support grid firming in a region transitioning to renewable generation sources. The Project is strategically located adjacent to an approved Solar Farm, and is nearby the Griffith Substation and South West REZ.

The feasibility of alternatives is considered in Section 2.5, which concludes that the benefits of the BESS would outweigh the impacts. The Project has been designed to be to be responsive to the site's environmental features. Specifically, the Project has:

- Sought to use a land parcel with existing approval for electricity generation infrastructure (DA 291/2018)
- Sited the BESS Area on a land parcel with little to no native vegetation or habitat value

- Engaged in early and frequent engagement with key stakeholders, neighbours and the broader community to allow for the final design to include valuable local knowledge
- Chosen a site with a small number of potential sensitive receptors in proximity
- Made efficient use of land in proximity to existing electrical infrastructure, including nearby solar farms and the Griffith Substation.

If constructed, the Project will address the following key issues identified in Section 6:

- Facilitate NSW's shift towards renewable energy in accordance with the NSW Electricity Infrastructure Roadmap and the NSW Electricity Strategy.
- Support the energy storage and firming requirements of the national electricity market in accordance with the Australian Energy Market Operator (AEMO) 2022 Integrated System Plan for the NEM.
- Enhance the stability and resilience of the electricity network by providing energy storage, thereby ensuring consistent back-up power supply during electricity outages.
- Provide for a development that is suitable to the rural context and has no significant or unmanageable adverse environmental impacts.
- Support the locality through social and economic enhancement through the Project's construction and operational life.

7.2 Consistency with the strategic context and statutory requirements

As outlined in Section 6 and 7.1, the Griffith BESS is appropriately located to support grid firming in a region transitioning to renewable generation sources. If constructed the Project would have a contribution to storing power and stabilising the grid for an estimated 25 years.

The Project is in alignment with local, State, Australian government legislation and policy and global policies related to this transition, including:

- United Nations Framework Convention on Climate Change Conference of Parties (COP21) – The Paris Agreement
- Integrated System Plan 2024(AEMO)
- Net Zero Plan
- Commonwealth Renewable Energy Target Scheme (RET)
- Climate Change (Net Zero Future) Act 2023
- NSW Electricity Strategy
- NSW Transmission Infrastructure Strategy
- NSW Electricity Infrastructure Roadmap
- Riverina Murray Regional Plan 2041
- Riverina & Murray Joint Organisation (RAMJO) Statement of Strategic Regional Priorities
- Riverina & Murray Joint Organisation (RAMJO) Regional Energy Strategy
- Western Riverina Regional Economic Development Strategy – 2023 Update
- Griffth Community Strategic Plan 2025 – 2035
- Growing Griffith to 2045 – Griffith Local Strategic Planning Statement

Further to broad policy support and alignment, the Project has been successfully awarded an LDS LTESA by AEMO Services which was announced on the 27th of February 2025. As LDS, the Project must provide at least 8 hours of dispatch in accordance with the EII Act. Such a contract being awarded to Griffith BESS is a

recognition of the contribution that the Project will make towards system reliability, security and local communities, benefiting all NSW energy consumers over the long term. As established by the Minister for Energy under the EII Act, NSW will require at least 28 GWh of long duration energy storage by 2034. It also reinforces the Proponent's commitment to community engagement and benefit sharing which will include community benefit funding, investment into local manufacturing, investment into local training and development, local and First Nations procurement, and targeted local employment opportunities.

The Project has demonstrated it is permissible, in Section 4. As a State Significant Development, the Project has been assessed in accordance with *Environmental Planning and Assessment Act 1979* (EP&A Act). It is permissible in accordance with T&I SEPP. Mandatory matters have been considered including biodiversity, hazards and native title.

7.3 Community views, interest and benefit

The Proponent is committed to the ongoing delivery of best-practice community and stakeholder engagement, consistent with the *Undertaking Engagement Guidelines for State Significant Projects* (DPHI, 2024) and the Project-specific SEARs. Engagement has been undertaken with the Griffith community, neighbouring residents in Yoogali, relevant State and Commonwealth agencies, and local organisations to ensure that community views have informed the design, layout and preparation of this EIS. Feedback gathered since the pre-Scoping phase has contributed to measures that minimise potential construction and operational impacts, including noise, traffic and visual amenity.

Consultation identified several key areas of community interest, including fire risk management and emergency preparedness, the sourcing and safety of lithium-ion battery technology, and the appropriateness of agricultural land use for renewable energy infrastructure. While some stakeholders expressed concerns regarding land use and visual impact, others recognised the site's suitability given its location within a previously approved development area and distance from residential dwellings.

Community members and local organisations also demonstrated strong interest in the equitable distribution of benefits and governance of the proposed benefit-sharing model, with particular focus on transparency, inclusion of First Nations groups, and opportunities for local procurement and employment. Contractors and suppliers sought clarity on definitions of "local" participation to ensure fair representation of Griffith-based businesses.

The Proponent will continue to engage transparently with the community, Griffith City Council and other stakeholders to refine and implement a model for social and economic benefit-sharing in accordance with the benefit-sharing guideline. Through this approach, the Project aims to ensure that local communities experience tangible, lasting benefits alongside broader regional contributions to energy security and resilience.

7.4 Economic, social, environmental and cumulative impacts and uncertainties

The environmental issues of the Griffith BESS have been investigated through specialist investigations and the resulting mitigation strategies are considered feasible to address the impacts identified. Key uncertainties of the assessment activities are acknowledged below.

Overall, the results obtained in this EIS can be considered with moderate to high confidence, given the limited nature of the impacts and uncertainties. To ensure flexibility in the final consent, where required, conservative considerations have been given to all potential impacts.

Similarly, while an indicative Project Layout and Design is provided to provide a clearer understanding of what would be constructed, the delineation of a broader Project Site and Development Area at this stage provides the assessment and approval some resilience should there be minor layout changes through the detailed design process. Together this 'worst case' approach ensures that all impacts of construction, as well as operation and decommissioning are captured in the environmental assessment section of this EIS and that any recommendations and mitigation strategies would be appropriate to the final detailed design.

Regarding uncertainty, the investigation of key environmental matters found:

- Assessment of landscape and visual impacts is a qualitative (subjective) assessment, individuals are likely to associate different visual experiences to the Project Site.
- Assumptions needed to be made relating to the methodology of construction works.
- There are limitations to the noise assessment method regarding tonality and octave band data, while it is not expected to be a risk for the Project, tonality factors will continue to be reviewed as the Project progresses and will be a core consideration during tender and procurement.
- The SEIA cannot capture every idea and perspective put forward during the social impact assessment process and instead highlights themes that emerged through engagement activities.
- Community views are informed by a representative sample of community members and stakeholders consulted, and do not necessarily reflect the views of the entire community.
- All economic modelling has inherent limitations. In this case:
  - Supply chain complexity: actual local content may vary depending on subcontractor decisions and market conditions
  - Energy market volatility: revenue estimates from arbitrage and Frequency Control Ancillary Services are subject to fluctuations in energy prices and regulation
  - Employment intensity: labour efficiency may differ depending on final delivery method (Engineering, Procurement and Construction versus staged contractor model).
- In the economic impact modelling, the decommissioning impacts were not quantified as the process and timeframe are uncertain.

The Project demonstrates responsiveness to the findings of the specialist assessments. Project outcomes in terms of impacts on key economic, social and environmental values of the Project Site are summarised as follows in Table 37. A consolidated list of Project mitigation measures is provided at Appendix E.

Table 37 – Project impact summary

Matter	Impact
Biodiversity	The Project is not expected to have a significant impact on biodiversity values due to the highly modified nature of the Development Area, no proposed native vegetation removal, and no creeks or waterbodies in the surrounding area.
Aboriginal cultural heritage	No Aboriginal heritage sites or places were identified during the survey therefore the Project is predicted to have a low or very low potential to impact Aboriginal cultural heritage.
Historic heritage	No historic heritage objects or places were identified during the survey therefore the Project is predicted to have no potential to impact historic heritage.
Land	During the construction phase, potential impacts on the Project Site land and agricultural use include the production of construction-related dust and the potential for impact on livestock through noise disturbance and vehicle movements. No loss of agricultural production or income is expected.
Landscape and visual amenity	The visual impact of the Project is very low to low primarily as a result of residences being surrounded by vegetation, as well as the occurrence of intervening vegetation in the landscape which screens or filters views of the Project components.
Noise	The predicted noise level at receivers is below the most stringent project noise trigger level of 35 dB LAeq, 15 min, by a minimum margin of 1 dB.
Transport	An increase in traffic movements is expected to take place during the construction period due to deliveries and construction workers. In the peak of the construction period, 110 to 170 light and 30 to 100 heavy vehicle movements are expected at the Project Site daily.
Water	The Project will generate an additional 13.6 ML/year of runoff, which can be managed via the proposed on-site detention basin and ensure the water balance is maintained. Effective erosion and sediment control will be required to prevent environmental degradation during and after construction.
Hazards	The lithium-ion batteries are a Class 9 Dangerous Good which introduces the risk of battery fire and ignition.

Matter	Impact
	The Project introduces Electric and Magnetic Fields (EMFs) within the accepted levels.
Contamination and soil	Areas of the Project Site with higher salinity may pose threat of concrete degradation for infrastructure that is placed within this soil. Deeper structures and installations required for the Project creates the risk of dispersion, poor infiltration, and erosion.
Social and economic	The Project creates a number of positive and negative impacts to the community including, a temporarily increase the local population, likely affecting housing, services, and local roads and traffic, and offers opportunities for local employment, skill development, and procurement.
Waste	The Project will generate waste during construction, operation and decommissioning.

7.5 Compliance monitoring and communication

As described at Section 6, a suite of management plans is proposed to be prepared to support the management and implementation of Project commitments and mitigation measures. This includes:

- Construction Environmental Management Plan (CEMP)
- Operation Environmental Management Plan (OEMP)
- Decommissioning Environmental Management Plan (DEMP)
- Cultural Heritage Management Plan (ACHMP)
- Construction Noise and Vibration Management Plan (CNVMP)
- Construction Traffic Management Plan (CTMP)

Each management plan would include performance indicators, timeframes, implementation and reporting responsibilities, communications protocols, a monitoring program, auditing and review arrangements, emergency responses, induction and training and complaint/dispute resolution procedures, as required. A monitoring and auditing program would clearly identify any residual impacts following mitigation.

The plans would incorporate all of the specific protocols and mitigation measures contained in this EIS and any additional applicable requirements from the DPHI's Conditions of Consent. They would be submitted to DPHI for endorsement prior to commencement of works. In addition to the Project specific management plans, in line with other State Significant Development consents, it is expected that the DPHI would condition the following in relation to this Project:

- Detailed plans of the final layout, showing comparison to the approved layout, prior to commencing construction
- Incident and non-compliance notification requirements
- Independent environmental audits.

7.6 Ecologically sustainable development

The principles of ecologically sustainable development (ESD), as listed in clause 193 of the EP&A Regulation, are as follows:

- **the precautionary principle**, namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and an assessment of the risk-weighted consequences of various options.
- **inter-generational equity**, namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations

- **conservation of biological diversity and ecological integrity**, namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration
- **improved valuation**, pricing and incentive mechanisms, namely, that environmental factors should be included in the valuation of assets and services such as:

- polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement
- the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste
- environmental goals, having been established, should be pursued in the most cost-effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.

The Precautionary Principle

This EIS has been prepared utilising the precautionary principle. That is, if threats are perceived as possibly leading to serious or irreversible environmental damage, then either the non– development of the Project would occur, or the development modified to ensure that such threats do not exist.

This EIS assesses the economic, environmental and social impacts associated with the Project. A conservative, 'worst case' approach was adopted for the assessments. No threat of serious or irreversible environmental damage is considered likely as a result of this Project. Section 6 details the expected impacts and ongoing management measures to minimise environmental and social impacts.

Inter-generational equity

The Project would not impact on natural or cultural features to a level that would compromise the health, diversity or productivity of the environment to a level that would impact on future generations. Furthermore, this Project would provide stability and reliability to the renewable energy supply in the area. This would help facilitate the transition to low carbon energy generation and help to reduce greenhouse gas emissions to minimise climate change implications for future generations.

Conservation of biological diversity and ecological integrity

The EIS 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 Proposal has incorporated avoidance, minimising and mitigation of impacts. The Proposal does not impact on any native vegetation. The Project Site is located on agricultural land which is comprised of exotic vegetation. Further, the Project Site has previously been approved for a Solar Farm Development, meaning no additional ecological impact as a result of the Project.

Environmental management measures have been identified to reduce the severity of impacts, namely indirect impacts, of the Proposal on biodiversity.

Improved valuation

Environmental matters were considered during the iterative design of this Project to ensure environmental impacts were avoided or minimised through design and/or mitigation measures. Environmental management safeguards and mitigation measures would be implemented during the construction, operation and decommissioning of this Project that will ensure impacts are manageable.

7.7 Conclusion

This EIS has been prepared pursuant to Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (the EP&A Act), Part 8, Division 5 of the Environmental Planning and Assessment Regulation 2021 (the EP&A Regulation), State Significant Development Guidelines – Preparing an Environmental Impact Statement (DPIE, 2022) and SEARs issued by DPHI on 23 June 2025 in response to the Scoping Report.

An assessment of potential environmental impacts has identified limited minor adverse residual impacts to the environment that would require the implementation of appropriate controls to ensure compliance in accordance with relevant legislation, standards and guidelines. Measures are proposed during both construction and operation to ensure impacts are appropriately managed. These measures would ensure compliance with relevant legislation and any conditions of approval.

During the public exhibition of this EIS, the community, local council and government agencies are invited to make informed submissions in relation to the Project. The consent authority would consider any formal submissions made during the exhibition period. The Applicant's response to all matters raised in submissions will also be exhibited as Department of Planning, Housing and Infrastructure (DPHI) commence preparation of their own assessment of the Project's impacts and its merits and make a recommendation regarding its ability to be approved.

Please take the opportunity to make a submission directly to the DPHI and to participate in the future engagement activities planned prior to the Project's determination.

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Appendices

Appendix A	SEARs table
Appendix B	Plans package
Appendix C	Statutory compliance table
Appendix D	Community engagement table
Appendix E	Mitigation measures table
Appendix F	Biodiversity Development Assessment Report (BDAR) Waiver
Appendix G	Aboriginal Cultural Heritage Assessment Report (ACHAR)
Appendix H	Landscape and Visual Impact Assessment (LVIA)
Appendix I	Noise and Vibration Assessment
Appendix J	Social and Economic Impact Assessment
Appendix K	Transport Impact Assessment
Appendix L	Waste Management Plan
Appendix M	Hydrology Assessment
Appendix N	Agriculture Impact Assessment
Appendix O	Preliminary Site Investigation and Soil Assessment
Appendix P	Preliminary Hazard Analysis (PHA)
Appendix Q	Bushfire Assessment Report
Appendix R	Estimated Development Cost (EDC) Report

Appendix A SEARs table

Requirement	Relevant Section
General requirements	
▪ A stand-alone executive summary	Summary
▪ a full description of the development, including: – details of construction, operation and decommissioning, including any staging of the development; – a description of the physical elements of the development including the form, maximum height and materials (including ancillary infrastructure); – a high quality site plan at an adequate scale showing all infrastructure and facilities (including any infrastructure, and accommodation camps, that would be required for the development, but the subject of a separate approvals process); – the Project Area (as per Table 1 of the SSD guidelines – preparing an environmental impact statement) and Development Footprint (disturbance area including but not limited to areas for infrastructure, road works, access tracks, defendable space, fencing and temporary laydown); – a high quality detailed constraints map identifying the key environmental and other land use constraints that have informed the final design of the development; and – confirmation if the project is designated development in accordance with the Environmental Planning and Assessment Act 1979 (EP&A Act) and the EP&A Regulation	Section 3
▪ consistency in information presented in the EIS and all technical reports, including distances, development footprint, project design and infrastructure proposed, construction timeframes and receiver numbers;	Whole document
▪ a strategic justification of the development focusing on site selection and the suitability of the proposed site with respect to potential land use conflicts with existing and future surrounding land uses (including existing land use, other proposed or approved energy facilities, major projects, rural/residential development, Crown lands within and adjacent to the project site and subdivision potential);	Section 2.5 Section 6.3 Section 7.1
▪ a risk assessment of the potential impacts of the development, identifying the key issues for further assessment;	Section 6
▪ an assessment of the likely impacts of the development on the environment, and any other significant issues identified in the above risk assessment, focusing on the specific issues identified below, including:	Section 6
– a description of the existing environment likely to be affected by the development using sufficient baseline data;	Section 6
– an assessment of the likely impacts of all stages of the development (which is commensurate with the level of impact), including any cumulative impacts of the site and existing, approved or proposed developments in the region and impacts on the site and any road upgrades, taking into consideration any relevant legislation, environmental planning instruments, guidelines, policies, plans and industry codes of practice including the Cumulative Impact Assessment Guideline (DPE, 2022);	Section 6 Section 6.13
– a description and assessment if staging of the project is proposed including any site mobilisation or pre-construction works;	N/A
– a description of the measures that would be implemented to avoid, mitigate and/or offset the impacts of the development; and	Section 6 Appendix E
– a description of the measures that would be implemented to monitor and report on the environmental performance of the development;	Section 7.5
▪ a model for community benefit-sharing, prepared in accordance with the Benefit-Sharing Guideline, including the terms of any proposed voluntary planning agreement with the relevant local council;	Section 5.8

Requirement	Relevant Section
▪ a consolidated summary table of all the proposed environmental mitigation, management and monitoring measures, identifying all the commitments in the EIS; and	Appendix E
▪ a detailed evaluation of the merits of the project as a whole, having regard to:	
– the requirements in Section 4.15 of the EP&A Act, including the objects of the Act and how the principles of ecologically sustainable development have been incorporated in the design, construction and ongoing operations of the development;	Section 7.1 Section 7.2
– the suitability of the site with respect to potential land use conflicts with existing and future surrounding land uses;	Section 6.3 Section 6.13.3.2
– feasible alternatives to the development and its key components, including siting and project design alternatives to avoid areas of biodiversity value and high archaeological sensitivity, opportunities for shared infrastructure with proposed developments in the region, and the consequences of not carrying out the development;	Section 2.5
– a detailed consideration of the capability of the project to contribute to the security and reliability of the electricity system in the National Electricity Market, having regard to local system conditions and the Department's guidance on the matter.	Section 2 Section 7
Estimated Development Cost and Employment ▪ Provide the estimated development cost (EDC) of the development prepared in accordance with the relevant planning circular using the Standard Form of EDC Report; and	Section 3.1 Appendix R
▪ Provide an estimate of the retained and new jobs that would be created during the construction and operational phases of the development, including details of the methodology to determine the figures provided.	Section 3.4
The development application must also be accompanied by: ▪ the consent of the owner/s of the land (as required in Section 23(1) of the EP&A Regulation); and	Attached to application
▪ a declaration from a Registered Environmental Assessment Practitioner that the EIS includes the information specified in the Department's Registered Environmental Assessment Practitioner Guidelines.	EIS Declaration
Key Issues	
Biodiversity – including: ▪ an assessment of the biodiversity values and the likely biodiversity impacts of the project in accordance with Section 7.9 of the Biodiversity Conservation Act 2016 (NSW) (BC Act), having regard to the Biodiversity Assessment Method (BAM) 2020 and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must: – be prepared using the approved BDAR template; – document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in 4 accordance with the BAM; – assess the impacts associated with all ancillary infrastructure, including the transport route road upgrades; – include an assessment for serious and irreversible impacts (SAII) in accordance with Section 9.1 of the BAM; – include a strategy to offset any residual impacts of the development in accordance with the BC Act; and – be finalised by an accredited assessor as BAM-compliant within 14 days of submission; unless Conservation Programs, Heritage and Regulation Group (CPHR) and the Department of Planning, Housing and Infrastructure (DPHI) determine the proposed development is not likely to have any significant impacts on biodiversity values;	Section 6.1 Section 6.13.3.1 Appendix F

Requirement	Relevant Section
▪ an assessment of the likely impacts on listed aquatic threatened species, populations or ecological communities, scheduled under the Fisheries Management Act 1994, and a description of the measures to minimise and rehabilitate impacts; ▪ a cumulative impact assessment of biodiversity values in the region from nearby developments; and ▪ if an offset is required, details of the measures proposed to address the offset obligations	
Heritage – including: ▪ an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and the Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), identifying, describing, and assessing any impacts to any Aboriginal cultural heritage sites or values associated with the site (including impacts from any proposed earth works, construction works and road upgrades), including results of archaeological test excavations (where required), undertaken in accordance with the relevant standards and requirements, unless Heritage NSW and DPHI agree otherwise; ▪ evidence of adequate consultation with Aboriginal communities in determining and assessing impacts, identifying and selecting options for avoidance of Aboriginal cultural heritage and identifying appropriate mitigation measures (including the final proposed measures), having regard to the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010); and ▪ assess the impact to historic heritage having regard to the Guidelines for Preparing a Statement of Heritage Impact	Section 6.2 Appendix G
Land – including: ▪ a detailed justification of the suitability of the site and that the site can accommodate the proposed development having regard to its potential environmental impacts, land contamination, permissibility, strategic context and existing site constraints; ▪ an assessment of the potential impacts of the development on existing land uses on the site and adjacent land, including: – agricultural land, flood prone land, nearby drinking water catchments, Crown lands, mining, quarries, mineral or petroleum rights (if relevant); – a soil survey to determine the soil characteristics and consider the potential for salinity, acid sulfate soils, and erosion to occur; – a cumulative impact assessment of nearby developments; and – the development potential of that land; and ▪ an assessment of the compatibility of the development with existing land uses, during construction, operation and after decommissioning, including: – consideration of the zoning provisions applying to the land, including subdivision (if required); – completion of a Land Use Conflict Risk Assessment in accordance with the Department of Industries Land Use Conflict Risk Assessment Guide (if required); – an assessment of impact on agricultural resources and agricultural production on the site and region; and	Section 6.3 Section 6.13.3.2 Appendix N
▪ a preliminary investigation into potential contamination across the site, in accordance with the State Environmental Planning Policy (Resilience and Hazards) 2021 (Hazards SEPP) (as required).	Section 6.7 Appendix O
▪ a detailed assessment of the likely visual impacts of all components of the project on surrounding residences (including approved developments, lodged development applications and dwelling entitlements), and key locations, scenic of significant vistas and road corridors in the public domain; and ▪ details of measures to mitigate and/or manage potential impacts (including a draft landscaping plan for on-site perimeter planting, with evidence it has been developed in consultation with affected landowners).	Section 6.4 6.13.3.5 Appendix H
Noise – including:	Section 6.5 Section 6.13.3.3

Requirement	Relevant Section
▪ an assessment of the construction noise impacts (including impacts from proposed road upgrades) of the development in accordance with the Interim Construction Noise Guideline (ICNG), operational noise impacts in accordance with the NSW Noise Policy for Industry (2017), assess traffic noise having regard to the NSW Road Noise Policy (DECCW, 2011) and cumulative noise impacts (considering other developments in the area), including (where appropriate): – identification of impacts associated with construction, site emission and traffic generation at noise affected sensitive receivers, including the provision of operational noise contours; – details of noise monitoring survey, background noise levels and amenity noise levels at the most-affected residential receivers; – details of likely daily charging/discharging load profile, manufacturer specifications for plant and equipment and noise source inventory (including intensity, quantity, location, directivity and frequency information)]; – an assessment of 'worst case' noise emission scenarios during periods of discharging and charging; – consideration of annoying characteristics of noise and prevailing meteorological conditions in the study area; and – details and analysis of the effectiveness of proposed management and mitigation measures to adequately manage identified impacts, including a clear identification of residual noise and vibration impacts following application of these mitigation measures and details of any proposed compliance monitoring programs.	Appendix I
Transport – including: ▪ an assessment of the peak and average traffic generation, including light vehicles (including shuttle buses), heavy vehicles, heavy vehicles requiring escort, high risk heavy vehicles requiring escort (noting Table 1 in TfNSW Fact Sheet - Transport Management Plans for Over Size and/or Overmass Movements in NSW) and construction worker transportation; ▪ an assessment of the likely transport impacts to the site access route(s) from the above listed vehicles including the site access point(s) and any Crown land, particularly in relation to the capacity and condition of the roads, road safety and intersection performance; ▪ a concept Level Route Analysis required for heavy vehicles requiring escort and high risk heavy vehicles requiring escort; a cumulative impact assessment of traffic from nearby developments (including mining operations); and provide details of measures to mitigate and / or manage potential impacts (developed in consultation with the relevant road authorities) including: – a schedule of all required road upgrades (including resulting from heavy vehicle and over mass / over dimensional traffic haulage routes), – strategic concept designs of proposed road upgrades (including the site access point); and – road maintenance contributions, and any other traffic control measures.	Section 6.6 Section 6.13.3.4 Appendix K
Water and Soils – including: ▪ an assessment of the likely impacts of the development (including flooding and flood modelling) on surrounding watercourses (including their Strahler Stream Order), groundwater resources and surface water movements, and measures proposed to monitor, reduce and mitigate these impacts including water management; ▪ a site water balance for the development; ▪ details of water requirements and supply arrangements for construction and operation (including consultation with suppliers); ▪ a description of the erosion and sediment control measures that would be implemented to mitigate any impacts in accordance with Managing Urban Stormwater: Soils & Construction (Landcom, 2004) and Managing Urban Stormwater: Soils and construction – Volume 2A manual (Landcom, 2008); ▪ assessment of the impacts of the development on hydrology and groundwater (if extraction or interference is proposed), including any changes to overland flows and	Section 6.7 Section 6.8 Appendix M Appendix O

Requirement	Relevant Section
groundwater levels on-site or off-site, and detail design solutions and operational procedures to manage impacts; ▪ where the project involves works within 40 metres of any river, lake or wetlands (collectively waterfront land), identify likely impacts to the waterfront land, and how the activities are to be designed and implemented in accordance with the DPI Guidelines for Controlled Activities on Waterfront Land (2018) and (if necessary) Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (DPI 2003), and Policy & Guidelines for Fish Habitat Conservation & Management (DPE, 2013); and ▪ identification of any flood risk on site having regard to adopted flood studies, the potential effects of climate change and any relevant provisions of the NSW Flood Risk Management Manual; – where the development could alter flood behaviour, affect flood risk to the existing community or expose its users to flood risk, provide a flood impact and risk assessment (FIRA) prepared in accordance with the Flood Impact and Risk Assessment – Flood Risk Management Guide LU01; – detailed design solutions and operational procedures to mitigate flood risk where required.	
Hazards – including: ▪ *Health* - an assessment of potential hazards and risks including but not limited to fires, spontaneous ignition, electromagnetic fields for the proposed grid connection infrastructure against the International Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines for limiting exposure to Time-varying Electric, Magnetic and Electromagnetic Fields; ▪ *Bushfire* – a bush fire hazard assessment completed by a suitably qualified consultant and identify potential hazards and risks associated with bushfires / use of bushfire prone land including the risks that a BESS would cause a bush fire and demonstrate compliance with Planning for Bush Fire Protection 2019; ▪ *Dangerous Goods* - a preliminary risk screening completed in accordance with the State Environmental Planning Policy (Resilience and Hazards) 2021; and ▪ *Battery Energy Storage System* - a Preliminary Hazard Analysis (PHA) prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guideline for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011). The PHA must consider all recent standards and codes and verify separation distances to on-site and off-site receptors to prevent fire propagation and compliance with Hazardous Industry Advisory Paper No. 4, Risk Criteria for Land Use Safety Planning (DoP, 2011). The PHA must consider the effect of bushfires on batteries or other components of the BESS; ▪ *Pipeline* - Report on the consultation outcomes with the pipeline operator to ensure the safety of the pipeline is appropriately considered and any specific concern raised by the pipeline operator is capable of being adequately addressed	Section 6.9 Appendix P
Social – including an assessment of the social impacts or benefits of the project for the region and the State as a whole in accordance with the Social Impact Assessment Guideline (DPE, 2023), including consideration of any increase in demand for community infrastructure services, and consideration of construction workforce accommodation.	Section 6.11 Section 6.13.3.7 Appendix J
Economic and Benefit-Sharing – including an assessment of the economic impacts or benefits of the project for the region and the State as a whole and provide details of any proposed voluntary benefit sharing, having regard for the Benefit-Sharing Guideline 2024 and Private Agreement Guideline 2024.	Section 5.8 Section 6.11
Waste – including: ▪ identify, quantify and classify the likely waste stream to be generated during construction, operation, and decommissioning, and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste (in consultation with waste facilities, including Council)	Section 6.12 Appendix L
Plans and Documents	
The EIS must include all relevant plans, diagrams and relevant documentation required in accordance with the SSD Guidelines and under Part 3 of the EP&A Regulation. Provide these as part of the EIS rather than as separate documents. In addition, the EIS must include high quality files of maps and figures of the subject site and proposal.	Whole document

Requirement	Relevant Section
Legislation, Policies & Guidelines	
The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans as identified.	Section 2, 4, 6 and 7
Consultation	
During the preparation of the EIS, you should consult with the relevant local, State or Commonwealth Government authorities, infrastructure and service providers, community groups, affected landowners and any exploration licence and/or mineral title holders. In particular, you must undertake detailed consultation with affected landowners surrounding the development, the owners of all exploration licences across the proposed development site, the operator of any pipelines on or adjacent to the site, and all relevant government agencies, including the relevant local Council. The EIS must: ▪ detail how engagement undertaken was consistent with the Undertaking Engagement Guidelines for State Significant Projects (DPHI, 2024); and ▪ describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, an explanation should be provided.	Section 5
Expiry Date	
If you do not lodge a Development Application and EIS for the development within 2 years of the issue date of these SEARs, your SEARs will expire. If an extension to these SEARs will be required, please consult with the Planning Secretary 3 months prior to the expiry date.	Lodgement is within 2 years of SEARs issue date.

Appendix B Plans package

Appendix C Statutory compliance table

Statutory reference	Requirement	Relevance	Section in EIS
Commonwealth Legislation			
Native Title Act 1993			
	Native Title claims may come into conflict with the progression of development on land that is being contested. Native Title must be recognised and protected where necessary.	No Native Title claims have been made against any of the Project Site, nor are in progress.	Section 4.2.4.3
Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)			
Matters of National Environmental Significance	Protection of MNES and identification of potential impact.	An EPBC referral is being prepared for the Project, with the expectation that there will be no significant impact found as a result of the Project.	Section 4.2.4.2
State Legislation			
Environmental Planning and Assessment Act 1979 (EP&A Act)			
Section 1.3 – Objects of the Act	The Project aligns with the Objects of the Act.	The Project complies with all Objects of the Act, except for Object (d), as the Project is not concerned with the delivery of housing.	Entire EIS
Section 4.15(1)	The application must consider: ▪ Any environmental planning instrument	The Project has considered the following instruments: ▪ Transport and Infrastructure SEPP (2021) ▪ Resilience and Hazards SEPP (2021) ▪ Griffith Local Environmental Plan (2014)	Section 4.2.4.5
	▪ Any proposed instrument	There are no related proposed planning instruments at the time of writing.	N/A
	▪ Any development control plan	The Project has considered the *Griffith Section 94a Development Contributions Plan* (2010)	Section 4.2.6
	▪ Any planning agreement that has been entered into or drafted	There are no relevant planning agreements that have been entered into by the Proponent as the developer.	Section 4.2.6
	▪ Any relevant Regulations under the EP&A Regulation	The EIS has been prepared in accordance with the requirements of the EP&A Regulation.	Section 4.2.6
	▪ Likely impacts of the development	The impacts, across key issues outlined in the Project SEARs, have been identified and considered.	Section 6
	▪ Suitability of the site for development	The site is considered suitable for development given the small size, existing approval for a solar farm and	Section 7.1

		proximity to existing and planned electrical infrastructure.	
	▪ Any submissions made in accordance with the EP&A Act	Public consultation has informed and will continue to inform the Project.	Section 5
	▪ The public interest	Approval of the Project is considered to be in the general public interest.	Section 7.3
Environmental Planning and Assessment Regulation 2021 (EP&A Regulation)			
Section 23 – Persons who may make development applications	Written consent is required for development applications on land where the applicant is not the owner of the land.	Landowner consent has been obtained for all parcels encompassed in the Project Site, from all affected landowners.	Attached to EIS lodgement.
Section 24 – Content of development applications	A development application must meet be lodged in the specified form through the NSW planning portal, and the corresponding fees paid.	The Project EIS has been lodged and fees paid through the NSW planning portal.	This application.
Section 192 – Content of environmental impact statement	An environmental impact statement must contain the following: ▪ a summary of the environmental impact statement	The EIS has included the mandatory elements as required.	Executive Summary
	▪ a statement of the objectives of the development, activity or infrastructure,		Section 3 Section 7
	▪ an analysis of feasible alternatives to the carrying out of the development, activity or infrastructure, considering its objectives, including the consequences of not carrying out the development, activity or infrastructure,		Section 2.5
	▪ an analysis of the development, activity or infrastructure, including— – a full description of the development, activity or infrastructure, and – a general description of the environment likely to be affected by the development, activity or infrastructure and a detailed description of the aspects of the environment that are likely to be significantly affected, and – the likely impact on the environment of the development, activity or infrastructure, and		Section 3 Section 4 Section 6

	– a full description of the measures to mitigate adverse effects of the development, activity or infrastructure on the environment, and – a list of the approvals that must be obtained under another Act or law before the development, activity or infrastructure may lawfully be carried out,		
	▪ a compilation, in a single section of the environmental impact statement, of mitigation measures		Appendix E
	▪ the reasons justifying the carrying out of the development, activity or infrastructure, considering biophysical, economic and social factors, including the principles of ecologically sustainable development set out in section 193.		Section 7
Biosecurity Act 2015			
Section 22 - Biosecurity duty—dealings with biosecurity matter and carriers	Any person who deals with any plant, who knows (or ought to know) of any biosecurity risk, has a duty to ensure the risk is prevented, eliminated or minimised, so far as is reasonably practicable.	The Project will adopt appropriate measures to prevent, eliminate or minimise any biosecurity risk.	Section 6.3
Biodiversity Conservation Act 2016			
	Threatened species, populations and ecological communities must be appropriately managed through protection and mitigation of development impacts.	The Project will not significantly impact on biodiversity values.	Section 6.1
Roads Act 1993			
Section 138 – Works and structures	Consent is required in order to perform works on a public road.	The Project may require work on Irrigation Way and Bob Irvin Road if transmission to Griffith Substation is to be undergrounded. If so, consent will be acquired as required under this Act.	Section 4.2.4.1
National Parks and Wildlife Act 1974			
Section 90 – Aboriginal heritage impact permits	In the presence of Aboriginal heritage sites and/or items, an Aboriginal heritage impact permit may be granted to alter or disturb these instances.	The Project Site does not contain any identified Aboriginal heritage sites or items and an Aboriginal heritage impact permit is subsequently not sought.	Section 4.2.4.6 Section 6.2
Contaminated Land Management Act 1997			

Section 60 – Duty to report contamination	Where land is found to be contaminated, the EPA must be notified.	The Development Area has been found to be clear of contaminants that would endanger humans as well as the BESS itself in the construction and operation phases.	Section 4.2.4.5 Section 6.7

Appendix D Community engagement table

Theme raised by community	EIS Section
Fire risk and safety	Section 2.3.2 Section 6.10 Section 6.13.3.6
Battery technology and supply chain	Section 3.3.1.1 Section 6.9 Section 7.1
Visual, noise and amenity impacts	Section 6.4 Section 6.5 Section 6.11
Site suitability and agricultural land use	Section 2.2.2 Section 6.3 Section 6.11 Section 6.13.3.2 Section 7.1
Energy affordability and reliability	Section 2.1 Section 7.3 Section 7.6
Benefit sharing	Section 5.8
Local procurement and job opportunities	Section 5.8 Section 6.11 Section 6.13.3.7 Section 7.4
Governance and process	Section 5.7 Section 7.5

Appendix E Mitigation measures table

Impact	Mitigation measure	Timing
General		
Construction impacts	A CEMP will be prepared for the Project. The CEMP will detail how the performance outcomes, commitments, and environmental management measures for the Project will be implemented and achieved during construction. The CEMP will also provide the roles and responsibilities of key construction personnel and describe how environmental risks associated with the Project will be managed.	Prior to construction
Operational impacts	An OEMP will be prepared to mitigate and manage environmental impacts during operation of the Project. The OEMP will include a program for monitoring and reviewing the performance of environmental controls, and where agreed corrective actions are implemented if necessary.	Prior to operation
Decommissioning impacts	A Decommissioning and Rehabilitation Plan will be prepared in consultation with the Associated Landowner prior to the cessation of operations. This Plan will identify the infrastructure that will be retained for the benefit of the landowner.	Prior to decommissioning
Biodiversity		
None expected	The Project will not result in direct or indirect impacts on biodiversity values. No mitigation measures are proposed.	Ongoing
Aboriginal and Historic Heritage		
Harm or desecration of an Aboriginal object	The Proponent should ensure that all employees and contractors are aware that it is an offence under Section 86 of the NPW Act to harm or desecrate an Aboriginal object unless that harm has been subject to approval as part of the necessary approvals process.	Ongoing
Cultural knowledge	Any cultural knowledge shared throughout this process must remain under community control. Approvals must be sought from the relevant contributors before any material is published, used in reports, or shared publicly.	Ongoing
Unexpected finds	Prior to ground disturbance, the proponent is to engage a heritage specialist to prepare a Cultural Heritage Management Plan (ACHMP) to address the potential for finding additional Aboriginal artefacts during construction following development consent. The ACHMP will outline an unexpected finds protocol and an unexpected skeletal remains protocol, and induction policies that will include a cultural heritage awareness procedure. Preparation of the ACHMP should be undertaken in consultation with the Griffith LALC and all Traditional Owner RAPs consulted as part of this ACHAR.	Ongoing
Unintended impact	All works proposed must be constrained to within the Development Area (including access tracks and lay down areas).	Construction
Removal of culturally significant soil	All topsoil removed during the construction of road access within the Development Area is to remain on site and used in rehabilitation works. This will ensure that in the low likelihood that this soil may contain Aboriginal objects, they will remain 'on country'.	Construction
Land Use and Agriculture		
Neighbourhood disruption	Nearby landowners will be consulted regarding the proposed timing and location of construction works, especially where some restriction on vehicular or stock movements would be necessary. This will minimise disruption to agricultural activities on neighbouring properties.	Detailed design and construction
Biosecurity	▪ All project vehicles to be cleaned and free of biosecurity matter before entering or leaving the Project area. ▪ New or existing infestations of any priority weed or unidentified weed will be reported to the appropriate weeds authority.	Construction

Impact	Mitigation measure	Timing
	▪ Where present within the Project area, weeds will be managed in accordance with the Biosecurity Act 2015 and the relevant regional strategic weed management plans. ▪ Disturbed areas will be stabilised and appropriately rehabilitated in line following the completion of construction.	
Dust	Dust suppression measures such as water carts and road polymers to keep dust levels down will be implemented. Vehicle speeds will be limited to reduce dust generation	Construction
Livestock disturbance	▪ Procedures will be implemented so that potential impacts or conflicts between neighbouring livestock and construction activities are appropriately managed. Procedures will be developed in consultation with affected landowners and will include management of: – Noise intensive activities during sensitive periods within the livestock production cycle (such as lambing and calving) – Vehicle movements and other activities within the vicinity of livestock – Movement of stock away from potential stressors created by construction activities.	Construction and Operation
Landscape and Visual		
Visual impact	Nearby landowners will be consulted regarding the proposed timing and location of construction works, especially where some restriction on vehicular or stock movements would be necessary. This will minimise disruption to agricultural activities on neighbouring properties.	Detailed design and construction
Building material juxtaposition	BESS units and buildings should be ameliorated through the use of a non-reflective finish of a natural green/grey/brown colour, as found in the landscape of the setting.	Ongoing
Noise		
Noise and vibration impact	To mitigate construction noise and vibration impacts, a Construction Nosie and Vibration Management Plan should be prepared.	Construction
Transport		
Traffic impact	The proposed access strategy aims to divert heavy vehicle inbound movements away from the Irrigation Way / Bob Irvin intersection, directing them instead to approach from the south via Hanwood Avenue and Bob Irvin Road.	Construction
Land Contamination and Soil		
Reuse and excavation of soil	• Avoid development designs that increase the potential for dispersion and erosion of the soil currently in place. For instance, slope batters should not be created with reworked soil from the Project Site. • Treat the soil from the Project Site, with gypsum or other chemical amelioration methods, if reuse is required for landscaping.	Construction
Hydrology		
Developed outflows	An on-site detention volume of 1,210 m^3 is required to restrict developed outflows to pre-development rates for the 1% AEP event, this will be sufficient to manage the indicated additional runoff and ensure offsite impacts are avoided.	Operation
General risk	A site specific Erosion and Sediment Control Plan, prepared in accordance with the IECA Best Practice Erosion and Sediment Control manual, will be required to mitigate risks.	Construction and Operation
Hazards		
BESS installation	The BESS is to be installed in accordance with manufacturer, UL9540A report and LSFT recommended clearances based on testing. It should also be installed with fire protection systems specified by the manufacturer and UL9540A report.	Detailed design and operation

Impact	Mitigation measure	Timing
Ventilation and fire risk	The vent covers of the BESS shall be constructed of non-combustible material. The vents shall not be located above battery packs within the BESS container.	Ongoing
Bushfire		
Fire spread	Establishment of an Asset Protection Zone (APZ) around the BESS Area at a minimum distance of 10 m to achieve a bushfire attack level (BAL) of 29 or below. During the construction phase, an APZ will also be established around all temporary construction buildings, also at a 10m buffer.	Ongoing
Construction	Safe access must be maintained with the public road system, accompanying a dedicated emergency and evacuation plan for all workers on site. Any temporary structures will not be constructed from non-combustible materials. A Construction Environmental Management Plan (CEMP) must be prepared with requirements for hot works permits, 24-hour emergency contact details, location of hazards, situation awareness and evacuation planning, and storage/handling of hazardous/flammable materials. This can also be accompanied by a Pre-incident Plan (PIP) which provides emergency services with key locations on-site for bushfire management.	Construction
Water supply	A minimum 20,000L Static Water Supply (SWS) is to be installed prior to construction. The SWS, for RFS use, will be fitted with a 65mm Storz outlet and will have a hard ground surface for access up to 4 m.	Detailed design and construction
Access and egress	All internal roads are to be at least 4 m wide, and an internal road is to be constructed around the BESS Area within the IPA. The secondary access from Bob Irvin Road must be connected to the internal track network.	Ongoing
Social and Economic		
Workforce accommodation	Develop and implement a Workforce Accommodation Plan.	Construction
Social licence	Implement benefit sharing commitments, including the LDS LTESA social licence commitments and additional funding or other commitments.	Ongoing
Local sourcing	Develop and implement a Local Content Plan to help deliver on local content commitments made under the LDS LTESA.	Ongoing (for duration of LDS LTESA)
Waste		
General waste	▪ Reduce and avoid waste generation through improved resource efficiency measures and industrial ecology partnerships; ▪ Separate recycling streams at source to enable collection separate from residual waste; ▪ Work with suppliers to reduce packaging and waste in supply chains; ▪ Implement and maintain best practice resource recovery systems; ▪ Actively seek other businesses that may use your waste as an input material in their business; ▪ Ensure that waste streams are collected by legitimate operators and taken to appropriate facilities; ▪ Specify and purchase recycled materials; ▪ Work with other producers to take responsibility for the end-of-life management of problem wastes; ▪ Ensure all staff and stakeholders are aware of their responsibilities with regard to waste and bin management; and ▪ Comply with regulations, including the SafeWork NSW – Codes of Practice.	Construction, operation and decommissioning

Appendix F Biodiversity Development Assessment Report (BDAR) Waiver

Appendix G Aboriginal Cultural Heritage Assessment Report (ACHAR)

Appendix H Landscape and Visual Impact Assessment (LVIA)

Appendix I Noise and Vibration Assessment

Appendix J Social and Economic Impact Assessment

Appendix K Transport Impact Assessment

Appendix L Waste Management Plan

Appendix M Hydrology Assessment

Appendix N Agriculture Impact Assessment

Appendix O Preliminary Site Investigation and Soil Assessment

Appendix P Preliminary Hazard Analysis (PHA)

Appendix Q Bushfire Assessment Report

Appendix R Estimated Development Cost (EDC) Report

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