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Mr Wayne Jones
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By email: Wayne.Jones@planning.nsw.gov.au

12 August 2022

Dear Mr. Jones,

RE: SSD 8889679 Liddell Battery and Bayswater Ancillary Works

Further to our previous correspondence dated 21 June 2022, and as discussed during the meeting between AGL Macquarie and the Department of Planning Post-Approvals team on Wednesday 20 July 2022, we provide the following information for consideration and approval by the Planning Secretary.

Condition A7 – Request to Stage Management Plans

In accordance with condition A7(a) of the development consent for SSD 8889679, AGL Macquarie requests permission from the Planning Secretary to stage management plans for the works in the following way:

Stage 1

Commencement	September 2022
Estimated Duration	16-18 months
Description of works	<p>Decoupling works:</p> <ul style="list-style-type: none">Alternative network connection arrangements for the Liddell 33 kilovolt (kV) switching station that provides electricity to infrastructure required for the ongoing operation of Bayswater and associated ancillary infrastructure and potential third-party industrial energy users.

Stage 2

Commencement	To be determined
Estimated Duration	To be determined
Description of works	<p>The Battery:</p> <ul style="list-style-type: none">A grid connected Battery Energy Storage System with capacity of up to 500 MW and 2 GWh <p>Bayswater Ancillary Works (BAW):</p> <ul style="list-style-type: none">Works associated with the ongoing operation of Bayswater which includes (but is not limited to), upgrades to ancillary infrastructure such as pumps, pipelines, conveyor systems, roads and assets to enable maintenance, repairs, replacement, expansion or demolition <p>Consolidated consents:</p> <ul style="list-style-type: none">A modern consolidated consent for the continued operation of Bayswater through the voluntary surrender and consolidation into this application of various existing development approvals required for the ongoing operation of AGLM assets.



The decoupling works are required to be completed first as they provide alternative network connection arrangements for the Liddell 33 kV switching station. The switching station provides electricity to infrastructure required for the ongoing operation of Bayswater and associated ancillary infrastructure. The decoupling works allow for the shutdown and demolition of Liddell to proceed without disruption to the ongoing operation of Bayswater Power Station. The closure of Liddell is planned for April 2023 which is 8 months away.

To support the overarching Environmental Management Strategy for the development, AGL Macquarie proposes that the initial subplans will focus on the Stage 1 decoupling works only. We request permission from the Planning Secretary to prepare and submit the following documents for the Stage 1 decoupling works only at this time:

- Condition B22 – Aboriginal Cultural Heritage Management Plan (ACHMP)
- Condition C1(e)(i) – the following subplans:
 - soil and stormwater
 - noise
 - air quality
 - contaminated land
 - waste; and
 - traffic.

Management plans and applicable subplans for Stage 2 works will be prepared, submitted, and approved by the Planning Secretary prior to those works commencing. Given the long lead time to Stage 2 works, there is the potential for the scope of works to change. Should this occur, a revised staging plan will be forwarded to the Planning Secretary for review and approval prior to the commencement of works.

Condition C1 – Environmental Management Strategy

Per condition C1 of the development consent, the following subplans will be produced for the relevant stages of work. These subplans will be specific to the decoupling activities and will address, and provide mitigation measures for, the key concerns of the EIS (as listed). However, they will be concise, high-level, and will be a framework to inform the development of the Contractor's management plans, strategies and programs.

Each subplan will outline potential risks and mitigation measures identified through the impact assessment conducted for the EIS. Additional recommended subplan sections are listed below for each environmental aspect:

Soil and Stormwater:

- Managing activities in proximity to waterways
- General Erosion and Sediment Controls
- Water Quality Monitoring

Noise:

- Construction noise management measures
- Out of Hours Work Protocol

Contaminated Land:

- Assessment and classification of excavated material



- Leaks and Spills
- Unexpected Finds Protocol

Waste:

- Waste Management Hierarchy
- Waste Classification, Segregation, Transport and Disposal

Air Quality:

- Construction Dust Management
- Construction Greenhouse gas emissions

Traffic:

- Oversized/Overmass Vehicle Movements
- Risk of collisions

The information used for the development of the subplans will be sourced directly from the EIS; no further assessments are expected to be required to develop the subplans within the strategy.

Applicability of Other Conditions:

We request the Department's consideration and concurrence on the following points:

Condition	Stage 1 (Decoupling works)	Stage 2 (Remaining works)
B2 Fire Safety Study	Not required – relates to the battery energy storage system only.	Condition B2 requires that a Fire Safety Study be undertaken prior to commencing construction of the battery energy storage system.
B5 Emergency Plan	Not required – relates to the battery energy storage system only.	Condition B5 requires that a comprehensive Emergency Plan and detailed emergency procedures be prepared for the battery energy storage system.
B8 Biodiversity Management Plan (BMP)	Not required – the clearing of native vegetation is not required as part of the Stage 1 decoupling works, so our understanding is that a BMP is not required for this stage of the project.	Should clearing of native vegetation be required for future stages of works, a BMP will be prepared and submitted to the Department for review and approval.
B22 Aboriginal Cultural Heritage Management Plan (ACHMP)	Submitted to DPE on 8 July 2022. (SSD-8889679-PA-1)	ACHMP to be prepared for future stages of work.
C1 Environmental Management Strategy	Condition C1 requires that an Environmental Management Strategy be prepared for the development and include the subplans listed in (e)(i). See request to stage above.	The prepared EMS is intended to be used for future stages of work, however separate subplans will be prepared specific to those works.
	It is our understanding that there is no DPE requirement to produce a Construction Environment Management Plan (CEMP). Despite this, it is expected that the Principal Contractor will produce a CEMP to the satisfaction of AGLM, but this will not require DPE approval.	



Close

In closing, we request endorsement from the Planning Secretary for the following:

1. The staged approach as described above is permitted, including the preparation of environmental management subplans for the Stage 1 decoupling works only at this time.
2. A Biodiversity Management Plan is not required for the decoupling works as there will be no clearing of native vegetation.

We thank you for your time in considering the requests and proposed approaches detailed within this letter, and would appreciate the Department's feedback at your earliest convenience.

Should you have any questions in relation to the information contained in this letter, please don't hesitate to contact me on the details below, or Summer Steward at Summer.Steward@agl.com.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'KW', is enclosed within a light blue rectangular border.

Kimberley Wilson

Environmental Advisor
for AGL Macquarie

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