

26 March 2019

sent by email correspondence

Mr Anthony Ko  
Planning Officer  
Resource and Energy Assessments – Planning Services  
NSW Department of Planning & Environment  
320 Pitt Street  
Sydney NSW 2000

Via email: Anthony.Ko@planning.nsw.gov.au

Dear Anthony

**Submissions Report - Response to submissions in relation to Modification 2**  
Hay Solar (SSD 8113)

This Submissions Report responds to submissions made by community, industry and government agencies on the Hay Sun Farm - Modification 2 report submitted to the NSW Department of Planning and Environment (DPE) on 14 February 2019 for the modification of the approved solar PV renewable energy generation facility known as the Hay Sun Farm as proposed for development by Plains SF No1. Pty Ltd.

**Submission**

DPE received four submissions on the submitted Hay Solar – Modification 2, being three from government agencies and one from the general public. The Hay Solar - Modification 2 exhibition period commenced on 7 March 2019 and concluded on 20 March 2019.

Appendix 1 of this Submissions Report addresses each submission with reference to the relevant party and additional information and response from Plains SF No1. Pty Ltd.

Plains SF No1. Pty Ltd is pleased to provide this report to DPE and looks forward to progressing the application for consent to develop, construct and operate this significant solar energy generation facility in New South Wales.

Sincerely



Jason Gibson  
Senior Development Manager, Overland Sun Farming Pty Ltd on behalf of  
Plains SF No1 Pty Ltd

# Appendix 1

## 1 RESPONSE TO GOVERNMENT AGENCY SUBMISSIONS

### 1.1 DIVISION OF RESOURCES & GEOSCIENCE

The Division has reviewed the Modification Application for the Hay Solar Farm (SSD 8113 Mod 2). As there is no change to the project development footprint, the Division advises that there are no new requirements or issues to address regarding mineral resources or exploration and mining titles.	Plains SF No1. Pty Ltd acknowledges and thanks NSW Division of Resources & Geoscience for its response.
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### 1.2 OFFICE OF ENVIRONMENT AND HERITAGE

<p>The modification seeks approval to install a battery storage system on the eastern side of the approved site sub-station. The proposed battery system will cover an area of approximately 30,000m2 and is to be located within the approved development footprint and outside identified areas of native vegetation and cultural heritage sensitivity within the site.</p> <p>Given this, OEH has no issue with the proposed modification.</p> <p>We note that if the modification is approved, the development would continue to be subject to conditions 12 and 18 of the original approval. These relate to site management plans for biodiversity and Aboriginal cultural heritage.</p>	Plains SF No1. Pty Ltd acknowledges and thanks NSW Office of Environment and Heritage for its response.
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### 1.3 ROADS & MARITIME SERVICES

<p>Roads and Maritime Services has reviewed the documentation supporting the proposed modification for the placement of a battery storage system on the site of the proposed solar farm. It is noted that the battery storage system is to be located within the northern part of the solar farm site and that the additional traffic generation is not significant when compared to the approved daily volumes limitations as per the current consent.</p> <p>The proposed transportation and construction of the battery storage system will need to be addressed as part of the required TMP for the construction of the overall facility.</p> <p>Based on the documentation provided Roads and Maritime Services advises that it would have no objection to the proposed modification.</p>	<p>Plains SF No1. Pty Ltd acknowledges and thanks NSW Office of Environment and Heritage for its response.</p> <p>Plains SF No1. Pty Ltd understands the requirement to address the transportation of the BSS within the TMP for the construction of the overall facility and will comply with the requirement.</p>
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### 1.4 FIRE & RESCUE NSW

<p>Due to the emerging hazards and risks associated with battery storage facilities, FRNSW recommends the following:</p> <ol style="list-style-type: none"><li>1. That a comprehensive ERP is developed for the site.</li><li>2. That the ERP specifically addresses foreseeable on-site and off-site fire events and other emergency incidents (e.g. fires involving solar panel arrays, bushfires in the immediate vicinity) or potential hazmat incidents.</li><li>3. That the ERP detail the appropriate hazard control measures that would need to be implemented to safely mitigate potential</li></ol>	<p>Plains SF No1. Pty Ltd acknowledges and thanks Fire &amp; Rescue NSW for its response.</p> <p>Plains SF No1. Pty Ltd understands the requirement to incorporate the BSS within the ERP the overall facility and will comply with the requirement.</p>
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<p>risks to the health and safety of firefighters and other first responders (including electrical hazards). Such measures would include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures, minimum evacuation zone distances and a safe method of shutting down and isolating the photovoltaic and battery storage systems (either totally or partially, as determined by risk assessment).</p> <p>4. Other risk control measures that may need to be implemented in a fire emergency (due to any unique hazards specific to the site) should also be included in the ERP.</p> <p>5. That two copies of the ERP (detailed in recommendation 1 above) be stored in a prominent 'Emergency Information Cabinet' located in a position directly adjacent to the site's main entry point/s.</p>	
<p>6. Once constructed and prior to operation, that the operator of the facility contacts the relevant local emergency management committee (LEMC). The LEMC is a committee established by Section 28 of the State Emergency and Rescue Management Act 1989. LEMCs are required to be established so that emergency services organisations and other government agencies can proactively develop comprehensive inter agency local emergency procedures for significant hazardous sites within their local government area. The contact details of members of the LEMC can be obtained from the relevant local council.</p>	<p>Plains SF No1. Pty Ltd understands the requirement to contact the LEMC prior to the operation of the facility and will comply with the requirement.</p>

<ol style="list-style-type: none"> <li>7. To ensure that the facility's existing and proposed fire prevention, detection, protection and firefighting measures are appropriate to the specific fire hazards and adequate to meet the extent of potential fires, a comprehensive fire safety study (FSS) is recommended to be undertaken.</li> <li>8. That the FSS is developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper No.2 (HIPAP No.2).</li> <li>9. That the FSS is required to be approved by FRNSW. We request FRNSW approval of the FSS is a condition of consent.</li> <li>10. That the development of the FSS considers the limited operational capability of local fire agencies and the need for the facility to achieve an adequate level of on-site fire and life safety independence.</li> <li>11. To achieve a satisfactory level of fire safety, it is our recommendation that the FSS is developed in close consultation with FRNSW.</li> </ol>	<p>Plains SF No1. Pty Ltd understands the requirement to undertake an FSS in consultation with Fire &amp; Rescue NSW prior to the construction of the BSS and will comply with the requirement.</p>
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## 2 RESPONSE TO PUBLIC SUBMISSIONS

### 2.1 ANTHONY GARDNER

<p>Why is the cynic in me questioning whether the reasons justifying this Modification are genuine and complete? As offered:</p> <ul style="list-style-type: none"><li>- manage electricity output to meet demand</li><li>- improve the reliability of electricity output</li><li>- provide frequency control and ancillary services to the electricity network.</li></ul> <p>Others have been more expansive, admitting that BES will provide an additional source of revenue. Still others admit the benefits of being able to charge from the grid after the sun has set.</p> <p>The altruistic reasons given above somehow don't justify the expenditure of tens of millions of dollars. Would I have expected to see some comment on consultation with the grid operator about the modification and its impacts and location? Probably.</p> <p>Why is the cynic in me thinking that information is being withheld from the public? In the concurrent submission of Modification 1, in addition to the EIS, there is:</p> <ul style="list-style-type: none"><li>- a covering letter (published)</li><li>- an Application (published)</li><li>- a political donations statement (unpublished). In the Application, the applicant states that it has made a contribution(s) in the past two years.</li></ul>	<p>Plains SF No1. Pty Ltd acknowledges and thanks Anthony Gardner for his response.</p> <p>Plains SF No1 Pty Ltd considers that the submitted information in support of the proposed Modification 2 provides information that addresses planning requirements as relevant to the construction, operation and decommissioning of the works.</p>
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<p>- Other relevant unpublished documents</p> <p>Supporting this Modification 2, only the EIS exists.</p> <p>The cynic in me is surprised that only BES systems of 30 MW and above require a Preliminary Hazard Analysis. Only this week, television aired a whole program where a 747 was bought down by fire caused by much smaller lithium batteries. How can you make the statement that there will be no additional environmental impacts if you haven't done a Hazard Analysis on a project Mod with known hazards.</p> <p>The cynic in me is not surprised that the developer has chosen, after DPE input, a battery size of a maximum of 29MW.</p> <p>However, I cant grasp why 30 containers requires an area 50% greater than the MCG and proportionally way out of scale with the much larger Hornsdale "big battery". Nor can I grasp how this will cause no "additional surface disturbance" as mentioned in a number of places.</p> <p>The cynic in me is also not surprised that DPE, according to the developer, has classed this Modification as minor. We have seen before the department predicting the outcome of an Application before the merit assessment.</p> <p>In the section on heavy vehicle movements, the applicant clearly implies that the BES will be constructed concurrently with the solar farm. Somehow, I don't believe the commitment is there and will not be until the State or Federal Government, in desperation, announces a BES subsidy.</p> <p>In the letter to the Council, the developer writes: "The batteries, if installed..."</p>	
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<p>I smiled as I read the comment on decommissioning the batteries, with the implication that the batteries will last as long as the projected life of the solar farm.</p> <p>And finally, the cynic in me will be waiting for the Assessment, undoubtedly positive, that restricts the BSE to 29MW max, that insists that the BSE with the security and reliability benefits it purports to bring, ala Finkel, must be completed in parallel with the solar farm, that states the battery can only be constructed in the location specified and that thoroughly reviews the claim that there are no additional environmental impacts.</p>	
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