

Department of Planning, Housing and Infrastructure

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# Burroway Solar Farm

State Significant Development Assessment Report (SSD-55968733)

December 2025





## Acknowledgement of Country

The Department of Planning, Housing and Infrastructure acknowledges that it stands on Aboriginal land. We acknowledge the Traditional Custodians of the land and show our respect for Elders past and present through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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# Preface

This assessment report provides a record of the Department of Planning, Housing and Infrastructure's (the Department) assessment and evaluation of the State significant development (SSD) application for the Burroway Solar Farm, located approximately 18 kilometres north of Narromine, in the Narromine Shire local government area. The report includes:

- an explanation of why the project is SSD and who the consent authority is;
- an assessment of the project against government policy and statutory requirements, including mandatory considerations;
- a demonstration of how matters raised by the community and other stakeholders have been considered;
- an explanation of any changes made to the project during the assessment process;
- an assessment of the likely environmental, social and economic impacts of the project;
- an evaluation weighing up the project's likely impacts and benefits, having regard to the proposed mitigations, offsets, community views and expert advice; and provides a view on whether the impacts are on balance, acceptable; and
- a recommendation to the decision-maker, along with the reasons for the recommendation, to assist them in making an informed decision about whether development consent for the project should be granted and any conditions that should be imposed.

# Executive Summary

Edify Energy Pty Ltd (Edify) proposes to develop a 100 megawatt (MW) State significant development solar farm (the project) and associated 100 MW / 400 MW-hour (MWh) battery energy storage system, approximately 18 kilometres (km) north of Narromine in the Narromine Shire local government area. The site falls within the Central-West Orana Renewable Energy Zone (CWO REZ).

The site is zoned RU1 Primary Production, is located adjacent to the regional road network on land that has been largely cleared for agriculture, and has an existing 132 kilovolt (kV) transmission line that traverses the southern section of the site.

The Department of Planning, Housing and Infrastructure (the Department) exhibited the Environmental Impact Statement (EIS) for the project between 11 October 2024 and 7 November 2024 and received 83 public submissions, including 78 individual public submissions and five from special interest groups. The project received a total of 81 objections and two submissions in support. All individuals who made a submission were located more than 5 km away from the project, with the majority being located more than 100 km away. Narromine Shire Council (NSC) did not object and provided comment about waste, traffic, agricultural land, water and stormwater management, accommodation and cumulative impacts. Advice was also received from 16 government agencies and Dubbo Regional Council (DRC).

The Department consulted with Councils and relevant government agencies on key issues and inspected the site. None of the agencies, Councils or utility providers objected to the project, and they each recommended the implementation of appropriate mitigation and management measures.

Edify provided a Submissions Report and additional information addressing matters raised by NCS, agencies and public submissions. In response to DRC's concerns, Edify amended the project to include a workers accommodation camp. The amended project would lead to better outcomes and address key concerns by reducing the project's traffic impacts and reliance on local accommodation providers.

The key assessment matters are energy transition, land use compatibility and traffic and transport. The Department has undertaken a comprehensive assessment and has recommended conditions, developed in conjunction with agencies and Councils, to ensure all potential impacts are effectively minimised, managed or offset.

The site does not contain any mapped Biophysical Strategic Agricultural Land (BSAL) and land within the development footprint is categorised as Class 3 (high capability land), Class 4 (moderate capability land), Class 5 (moderate to low capability land) and Class 6 (low capability land). The project would not significantly reduce the overall agricultural productivity of the region and the site could be returned to agricultural uses in the future.

The project has been designed to avoid and minimise biodiversity impacts, with approximately 0.11 hectares (ha) of native vegetation proposed to be cleared, which would require offsetting of two ecosystem credits under the NSW Biodiversity Offset Scheme.

The Department considers the project would not result in unacceptable impacts on the capacity, efficiency or safety of the road network. Potential traffic impacts are largely restricted to the 20 month construction period and would be suitably managed through road upgrades, restricting vehicles to approved routes and implementation of a Traffic Management Plan. Access to the site would be via the Newell Highway and Eumungerie Road (a regional road).

The project is consistent with the Commonwealth's *Renewable Energy Target*, and NSW's *Climate Change Policy Framework* and *Net Zero Plan Stage 1: 2020 – 2030*, as it would contribute 100 MW of renewable energy to the National Electricity Market, including a battery with a capacity of 100 MW / 400 MWh. Importantly, the battery would enable the project to store energy for dispatch to the grid outside of daylight hours and / or during periods of peak demand, which has potential to contribute to increased grid stability and energy security.

The Department considers the site appropriate for the project as it has good solar resources, available capacity on the existing electricity network and is consistent with NSW's *Large Scale Solar Energy Guideline*.

The project would also provide flow-on benefits to the local community, including up to 250 construction jobs and a capital investment of \$379 million. Edify has also reached an in-principle agreement with NSC to enter into a voluntary planning agreement in accordance with the NSW *Benefit Sharing Guideline*, consisting of approximately \$85,000 paid annually and adjusted for consumer price index, with \$72,250 paid directly to NSC and \$12,570 dedicated towards a community benefit fund, managed by Edify. The community benefit funds would be dedicated to the local community and allocated in consultation with NSC.

The Department considers the project would not result in any significant adverse impacts on the local community or the environment, and any residual impacts could be managed through the implementation of the recommended conditions.

Overall, the Department's assessment concludes that the project would result in benefits to the State of NSW and considers the project is in the public interest. As such the Department concludes that the project is approvable subject to conditions.

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# 1 Project

## 1.1 Project overview

1. Edify Energy Pty Ltd (Edify) proposes to develop a 100 megawatt (MW) State significant development (SSD) solar farm (the project) and associated 100 MW / 400 MW-hour (MWh) battery energy storage system (BESS), approximately 18 kilometres (km) north of Narromine in the Narromine Shire local government area (LGA) (see Figure 1).
2. The project would involve construction of a solar farm, BESS, on-site temporary workers accommodation (TWA) facility, on-site substation and connection to the existing 132 kilovolt (kV) transmission line operated by Essential Energy that traverses the site. The project would also involve a minor subdivision of the substation area, which would be dedicated to Essential Energy.
3. Access to the site is proposed via Eumungerie Road. Construction of the project is anticipated to take approximately 20 months, with the solar farm, BESS component and substation taking approximately 16 months, with a peak construction period of approximately 6 months.
4. The key components of the project are summarised in Table 1, shown in Figure 2 and described in detail in the Environmental Impact Statement (EIS) and supporting documentation (see Appendix A to Appendix D).

**Table 1 | Key components of the project**

Aspect	Description
<b>Project summary</b>	<p>The project includes:</p> <ul style="list-style-type: none"><li>• approximately 200,000 solar panels mounted on a single axis tracking system (up to 4 metres (m) high) with a generating capacity of up to 100 MW;</li><li>• an on-site substation and switchyard and connection into Essential Energy's 132 kV transmission line;</li><li>• a BESS with up to 100 MW / 400 MWh capacity, either centralised or distributed throughout the site. The centralised BESS would be located in the south-eastern portion of the site near the on-site substation;</li><li>• TWA facility; and</li><li>• ancillary infrastructure including internal access tracks, security fencing, parking and maintenance buildings.</li></ul>

Aspect	Description
<b>Project area</b>	<ul style="list-style-type: none"> <li>Project Site: approximately 495 hectares (ha)</li> <li>Development footprint: approximately 396 ha</li> <li>TWA facility area: approximately 3 ha</li> </ul>
<b>Site entry and access route</b>	<ul style="list-style-type: none"> <li>Delivery vehicles would travel to the site from Port of Newcastle.</li> <li>All vehicles would access the site via either an existing or new site entry point off Eumungerie Road. As part of this assessment, use of the two site access points has been assessed.</li> <li>Existing internal access tracks would enable access to the TWA from the two site access points.</li> </ul>
<b>Road upgrades</b>	<ul style="list-style-type: none"> <li>Basic Right Turn (BAR) treatments to be installed at the site access point that is chosen for use along Eumungerie Road.</li> </ul>
<b>Construction</b>	<ul style="list-style-type: none"> <li>Construction is expected to take 20 months, including the construction of the TWA facility, with a peak period of approximately 6 months.</li> <li>Construction hours limited to Monday to Friday 7 am to 6 pm and Saturday 8 am to 1 pm.</li> </ul>
<b>Operation</b>	<ul style="list-style-type: none"> <li>The expected operational life of the infrastructure is approximately 50 years.</li> <li>The solar farm, BESS and supporting infrastructure would operate 24 hours a day, seven days a week.</li> </ul>
<b>Decommissioning and rehabilitation</b>	<ul style="list-style-type: none"> <li>At the end of the project life, all above and below ground infrastructure would be removed, and the land rehabilitated.</li> </ul>
<b>Subdivision</b>	<ul style="list-style-type: none"> <li>Subdivision would be required to facilitate connection to the transmission network and onsite switchyard (which would be Essential Energy owned).</li> </ul>
<b>Employment</b>	<ul style="list-style-type: none"> <li>Up to 250 full time equivalent (FTE) construction jobs and up to five FTE operational jobs.</li> </ul>
<b>Estimated development cost</b>	<ul style="list-style-type: none"> <li>Approximately \$379 million</li> </ul>

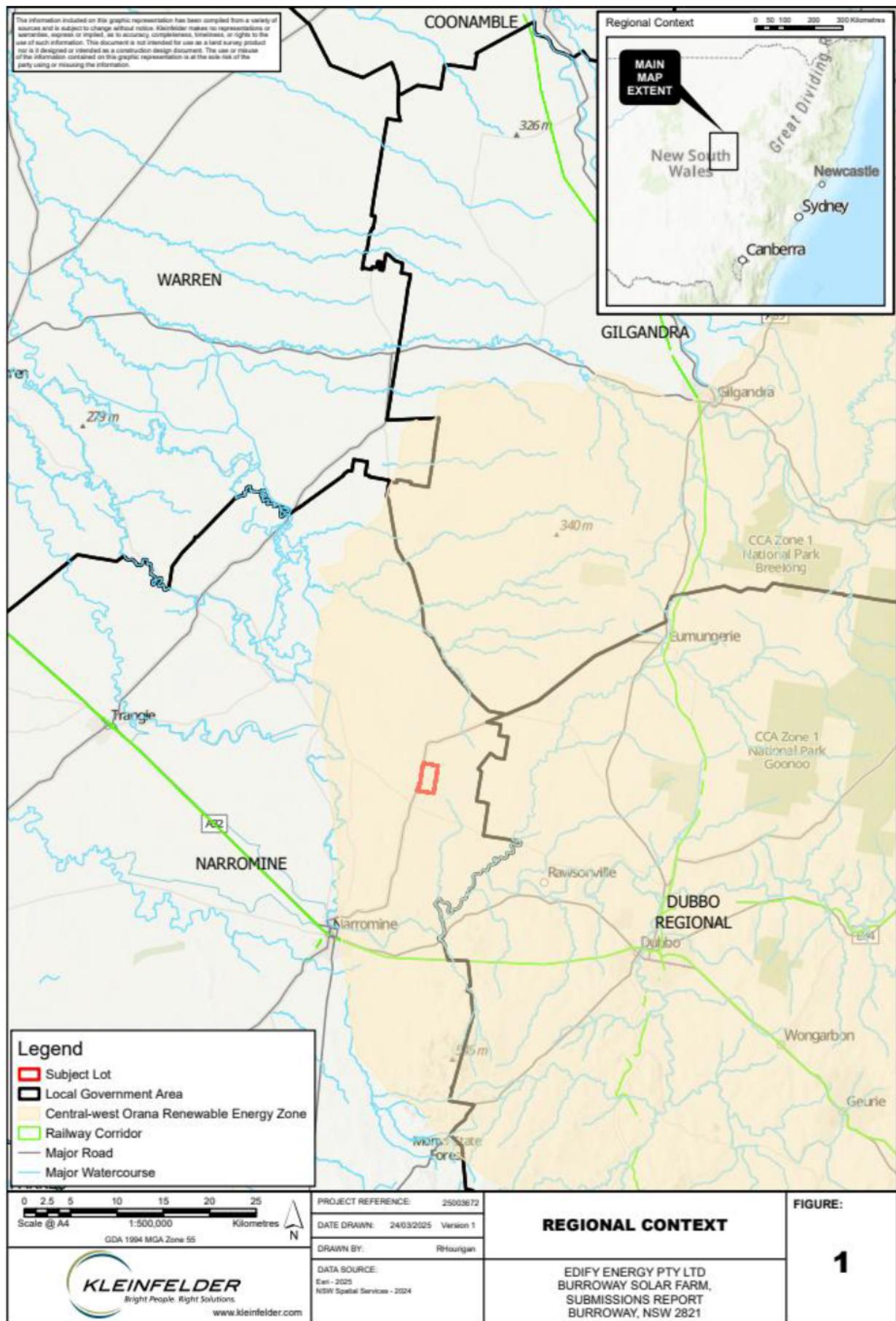


Figure 1 | Regional context map

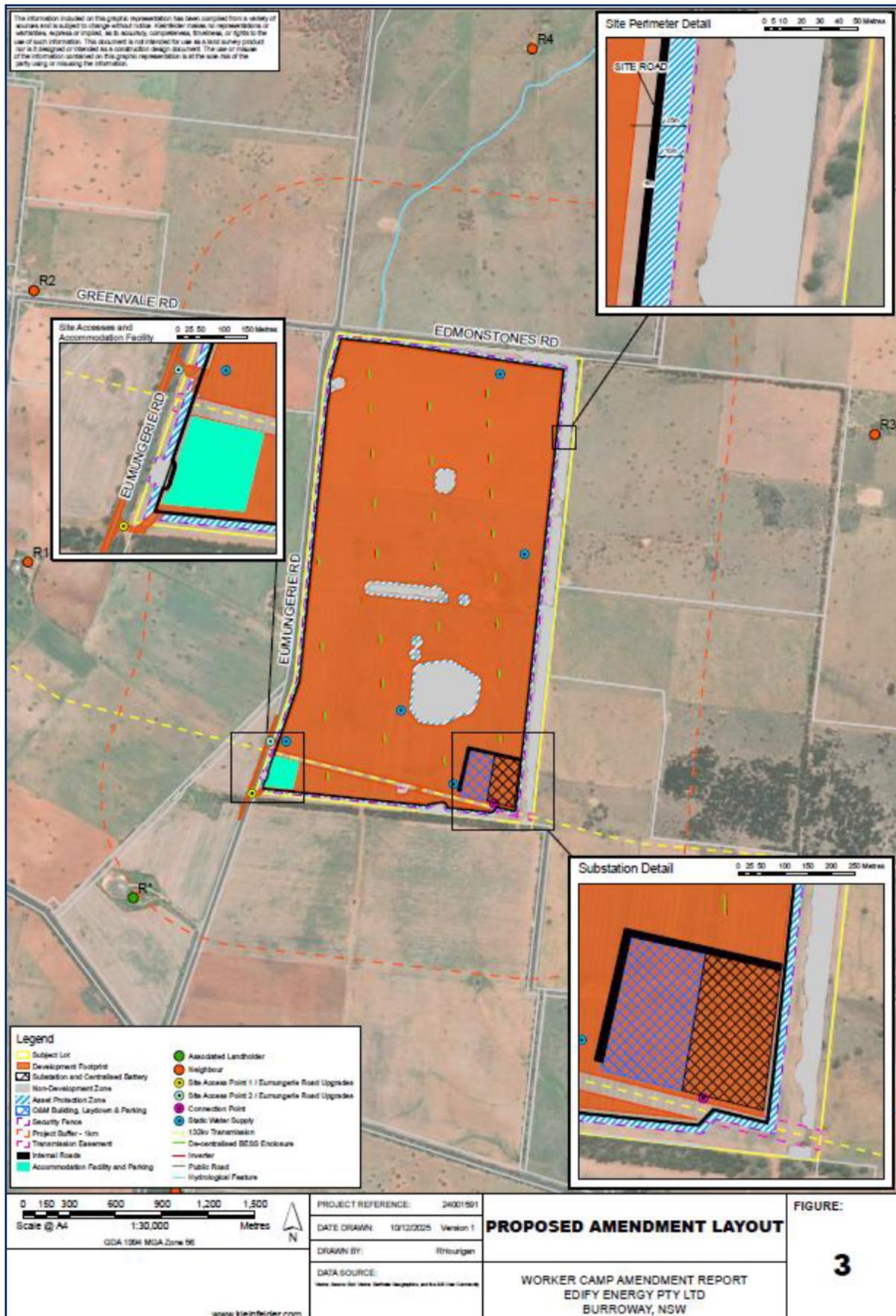
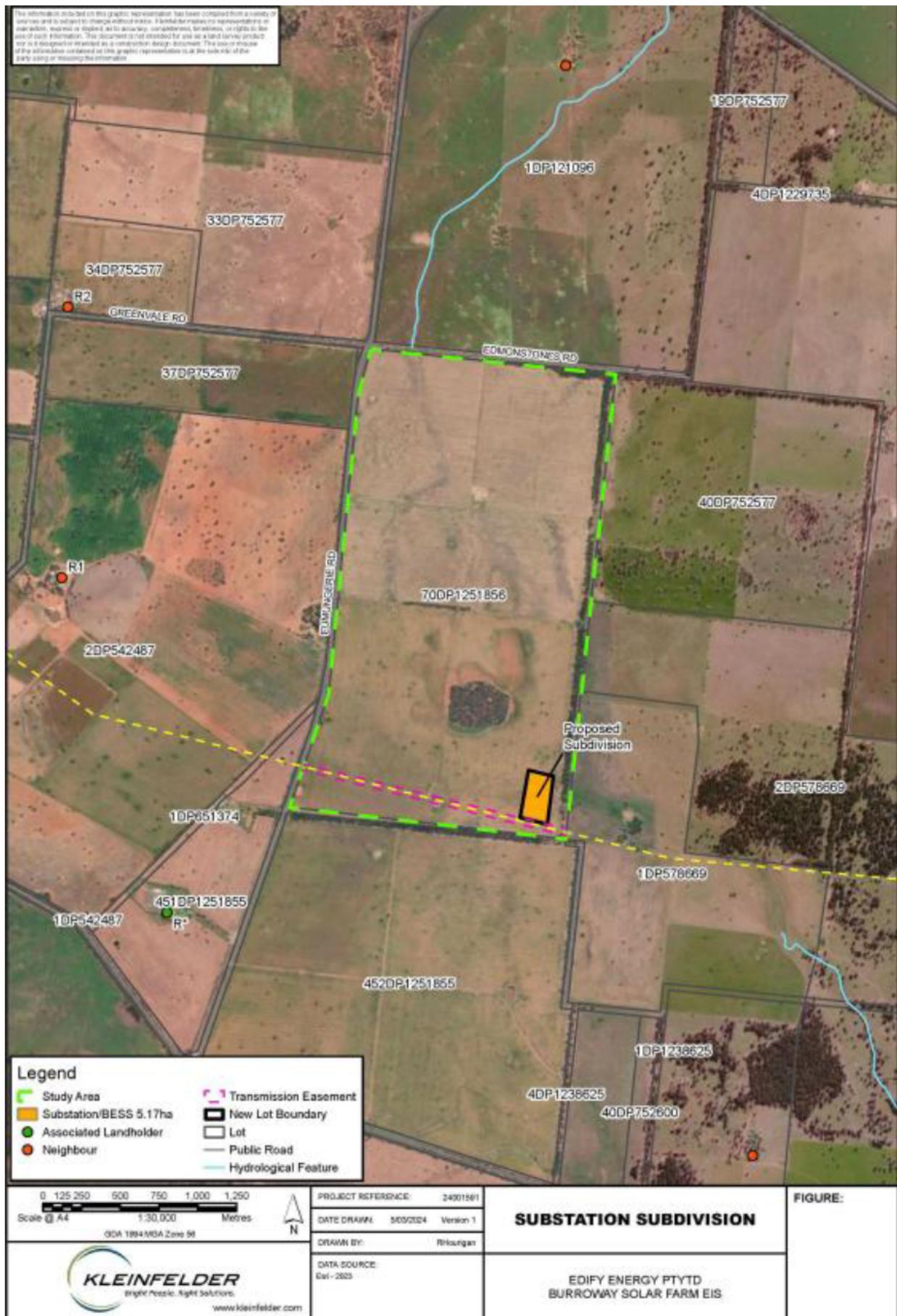


Figure 2 | Project layout



**Figure 3 | Proposed Subdivision**

## 2 Strategic Context

### 2.1 Site and surrounds

5. The site is zoned RU1 Primary Production and is largely cleared cropping land, with some native vegetation, comprising remnant woodland and native grass. There is an existing 132 kV Essential Energy transmission line which traverses the southern portion of the site. Surrounding land is predominantly zoned RU1 with some RU5 rural residential land uses.
6. The site is bound by Eumungerie Road to the west, which would provide access to the site, and Edmonstones Road to the north. The site is located within the Macquarie River Catchment, however, no watercourses exist on the site, with the exception of four farm dams.
7. Land within the site is generally flat and the site is well screened by existing vegetation running along the northern, eastern and southern borders of the site. The site does not contain any Biophysical Strategic Agricultural Land (BSAL) with approximately 55% being verified as land and soil capability Class 3 (high capability land), with the remainder comprising 17% of Class 4 (moderate capability land), 19% of Class 5 (moderate-low capability land) and 9% of Class 6 (low capability land). The project would not impact nearby land uses or agricultural activities, for both associated and non-associated landholders.
8. The development footprint has been designed to avoid site constraints such as dams, remnant woodland areas and isolated paddock trees. Permanent infrastructure would also be located on lower quality agricultural land.
9. A total of 16 receivers are located within a 5 km radius of the project area. Of these, four non-associated receivers are located within 2 km of the site, with the closest non-associated residence (R1) being located 1.8 km to the west.
10. The main aspects of the project are provided in detail in the Project Description chapter of the EIS and outlined in Table 1 above.

### 2.2 Other energy projects

11. There are two State significant renewable energy projects currently under assessment within 50 km of the project site (see Table 2).
12. Potential cumulative impacts at a regional level relate to traffic impacts along heavy vehicle access routes, loss of agricultural land and workforce accommodation and are discussed in Section 5.2.

**Table 2 |** Nearby Renewable Energy Projects

Project	Capacity (MW)	Status	Approximate distance from the project (km)
<b>Narromine BESS</b>	125	SEARs issued	20
<b>Wallaby Creek Wind Farm</b>	250	SEARs issued	35

## 2.3 Energy context

13. In 2024, NSW derived approximately 37% of its energy from renewable sources, the remainder being from fossil fuels, including 60% from coal and 3% from gas. NSW is one of the nation's leaders in large-scale renewable projects, with 45 major operational projects and 61 under construction or planned to be under construction.
14. The project's alignment with existing Commonwealth and State policies and strategies are considered in Table 3.

**Table 3 |** Energy Context

Policy	Summary
<i>Australia's Long Term Emissions Reduction Plan (2021)</i>	Sets a pathway to net zero emissions by 2050 and affirms Australia's commitment to meeting its revised 2030 target (43% below 2005 levels).
<i>Australian Energy Market Operator's 2024 Integrated System Plan (ISP)</i>	Notes: <ul style="list-style-type: none"><li>• without coal, investment is needed to meet significantly increased electricity demand requiring a six-fold increase in large-scale variable renewable energy generation;</li><li>• a mix of solar and wind is needed, and they offer complementary daily and seasonal profits; and</li><li>• forecasts there will be a demand for 83 GW of utility-scale wind and solar in the National Electricity Market by 2034-35, and 127 GW by 2049-50.</li></ul>

Policy	Summary
<p>NSW:</p> <p><i>Climate Change Policy Framework (2016),</i></p> <p><i>Transmission Infrastructure Strategy (2018),</i></p> <p><i>Electricity Strategy (2019),</i></p> <p><i>Electricity Infrastructure Roadmap (2020),</i></p> <p><i>Net Zero Plan Stage 1: 2020 – 2030 (2020) and Implementation update (2022),</i></p> <p><i>Central West and Orana Regional Plan 2036 and 2041</i></p> <p><i>Narromine Local Strategic Planning Statement (2020)</i></p>	<p>Relevant aspects of these policy documents include:</p> <ul style="list-style-type: none"> <li>• aims to achieve net zero emissions in NSW by 2050 and reduce emissions by 70% below 2005 levels by 2035;</li> <li>• notes all coal fired power plants in NSW are scheduled for closure within the next twenty years;</li> <li>• identifies REZs across NSW aimed at encouraging investment in new electricity infrastructure and unlocking additional generation capacity in order to ensure secure and reliable energy in NSW;</li> <li>• regional goals to support the State's transition to lower emissions and Narromine Shire Council's (NSC) goals to promote renewable energy production; and</li> <li>• CWO REZ was declared in December 2022 and is the first step in formalising the REZ under the <i>Electrical Infrastructure Investment Act (EI Act)</i>.</li> </ul>

## 2.4 NSW Solar Guideline

15. The Department of Planning Housing and Infrastructure (the Department) released the revised *Large-Scale Solar Energy Guideline* (the Guideline) in August 2022 to provide the community, industry, and regulators with guidance on the planning framework for assessing large-scale solar projects and identifying the key planning considerations relevant to solar energy development in NSW.
16. Edify has considered the potential visual and landscape impacts of the project in accordance with the revised guideline and the Department considers the project is consistent with the principles set out in the revised guideline. The Department released an updated solar guideline in November 2024, which does not change the key outcomes of the assessment.
17. The Solar Guideline recognises that large-scale solar projects could help to reduce reliance on fossil fuels, thereby contributing to reduction in air pollution and greenhouse gas emissions, while also supporting regional NSW through job creation and investment in communities that may not have similar opportunities from other industries.

# 3 Statutory Context

## 3.1 State significant development

18. The project is classified as State significant development (SSD) under section 4.36 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). This is because it triggers the criteria in clause 20 of Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), as it is development for the purpose of electricity generating works with a capital investment value of more than \$30 million.
19. Under section 4.5(a) of the EP&A Act and clause 1(b) of section 2.7 of the Planning Systems SEPP, the Independent Planning Commission (the Commission) is the consent authority for the project as it received more than 50 unique public submissions by way of objection during the exhibition period.

## 3.2 Amended application

20. In accordance with clause 37 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), a development application can be amended at any time before the application is determined. Edify sought to amend its application, the details of which are summarised in **Section 4.6** of this report. Under the delegation from the consent authority (i.e. the Commission for this development), the Director, Energy Assessments can agree to amendments to an application.
21. The Department accepted the amended application for the following reasons:
  - the project amendments ultimately served to reduce the potential cumulative impacts of the project as a whole (in particular traffic and accommodation);
  - the amended application directly responds to key issues raised in public submissions received by the Department during exhibition of the original application and Dubbo Regional Council's (DRC) concerns regarding accommodation pressure;
  - Edify assessed the impacts of the amended project (see **Appendix E**); and
  - the Department made the additional information available online and sent it to NSC and DRC and relevant government agencies for comment.

## 3.3 Permissibility

22. The site is zoned as RU1 Primary Production under the *Narromine Local Environmental Plan 2011* (Narromine LEP). Eumungerie Road is zoned as SP2 Infrastructure.

23. The project is permissible with consent as electricity generating works are permissible with consent on any land in a prescribed non-residential zone, including RU1 and SP2 zones, under clause 2.36 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP).

### **3.4 Integrated and other approvals**

24. Under section 4.41 of the EP&A Act, a number of other approvals are integrated into the SSD approval process and therefore are not required to be separately obtained for the project. Under section 4.42 of the EP&A Act, a number of further approvals are required, provided such approvals are substantially consistent with any development consent for the project (e.g. approvals under the Roads Act 1993).

25. The Department has consulted with the relevant government agencies responsible for the integrated and other approvals, including the future network operator Essential Energy, considered their advice in its assessment of the project, and included suitable conditions in the recommended conditions of consent to address these matters (see [Appendix F](#)[Appendix E](#)).

### **3.5 Commonwealth approvals**

26. Under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), assessment and approval are required from the Australian Government if a project is likely to impact on a Matter of National Environmental Significance (MNES), as it is considered to be a ‘controlled action’.

27. On 16 April 2025, a delegate of the Australian Government Department of Climate Change, Energy, the Environment and Water (DCCEEW) determined the project was not a ‘controlled action’ under the EPBC Act.

28. Therefore, the project does not need approval from the Australian Government as it would not result in impacts on MNES.

### **3.6 Renewable energy zone**

29. The EII Act coordinates investment in transmission, generation, storage and firming infrastructure in NSW and gives effect to the Electricity Infrastructure Roadmap. Under section 19 of the EII Act, the Minister for Energy may declare a renewable energy zone comprising a specified geographical area of the State, and specified generation, storage or network infrastructure.

30. This project is located in the geographical area specified in the CWO REZ declaration, which would comprise all planned, new and existing network infrastructure, with an intended network capacity of 4.5 gigawatts.

### **3.7 Mandatory matters for consideration**

31. Section 4.15 of the EP&A Act outlines matters a consent authority must take into consideration when determining development applications. The Department has considered these matters in its assessment of the project, as well as Edify's consideration of environmental planning instruments in the EIS. The Department has also considered relevant provisions of the environmental planning instruments in Appendix G.

### **3.8 Objects of the EP&A Act**

32. In determining the application, the consent authority should consider whether the project is consistent with the relevant objects of the EP&A Act (section 1.3) including the principles of ecologically sustainable development (ESD). Consideration of those factors is described in Appendix H. As a result of the analyses in Appendix H, the Department is satisfied that the project is consistent with the objectives of the EP&A Act and the principles of ESD.

### **3.9 Biodiversity development assessment report**

33. Section 7.9(2) of the *Biodiversity Conservation Act 2016* (BC Act) requires all SSD applications to be accompanied by a Biodiversity Development Assessment Report (BDAR) unless it is determined that the project is not likely to have any significant impact on biodiversity values (as identified in the BC Act and in the *Biodiversity Conservation Regulation 2017* (BC Regulation)). The BDAR (see Appendix A) and the overall impact of the project on biodiversity values is assessed in Section 5.5.

## **4 Engagement**

### **4.1 Department's engagement**

34. The Department publicly exhibited the EIS from 11 October 2024 to 7 November 2024, advertised the exhibition in the *Narromine Star* newspaper and notified surrounding landowners. The Department also consulted with NSC, DRC and government agencies throughout the assessment and inspected the site and surrounding areas in May 2025.

35. The Department notified and sought comment from Essential Energy in accordance with the Transport and Infrastructure SEPP. The Department also sought comment from EnergyCo (Enco) as the future network operator of the CWO REZ.

## 4.2 Summary of Council's submission

36. NSC did not object to the project but raised matters regarding:

- the design of proposed site access points;
- clarification regarding the proposed substation;
- waste and stormwater management;
- water supply and demand requirements; and
- preparation of an accommodation and employment strategy, in consultation with NSC.

37. Edify consulted with NSC to address its concerns and further responded to NSC's comments within the Submissions Report. NSC did not raise any additional concerns on the Submissions Report.

38. DRC raised concerns regarding the movement of heavy vehicles along Burroway Road and the use of rental accommodation within their LGA.

## 4.3 Summary of advice received from government agencies

39. During EIS exhibition, the Department received advice from 16 Government agencies. A summary of the advice is provided in Table 4 and full copies of the advice are provided in Appendix B.

**Table 4 | Summary of agency advice**

Agency	Advice summary
<b>Heritage NSW</b> <b>Group within</b> <b>NSW DCCEEW</b> <b>(HNSW)</b>	<ul style="list-style-type: none"> <li>• Noted the site does not contain and is not in the vicinity of any listed heritage items.</li> <li>• Flagged the adjacent 'Kookaburra' homestead and noted a detailed assessment of the historical significance of the homestead is to be undertaken if the project area is amended in the future.</li> <li>• Supports the findings of Edify's heritage study and the implementation of an unanticipated finds protocol during construction.</li> </ul>

Agency	Advice summary
<b>HNSW (Aboriginal Cultural Heritage)</b>	Requested evidence of ongoing consultation with Registered Aboriginal Parties (RAPs) and an updated Aboriginal Heritage Information Management System (AHIMS) search.
<b>Conservation Programs, Heritage and Regulation Group of the NSW Department of Climate Change, Energy, the Environment and Water (CPHR) (former Biodiversity, Conservation and Science Group)</b>	<ul style="list-style-type: none"> <li>Requested the BDAR be certified in accordance with section 6.15(1) of the <i>Biodiversity Conservation Act 2016</i> (BC Act).</li> <li>Flagged inconsistencies between native vegetation cover percentages shown in the Biodiversity Assessment Method calculator and spatial data files provided.</li> <li>Requested additional justification to support the plant community types (PCT) selected and those excluded.</li> <li>Noted that all sensitive regulated land is to be excluded from the development footprint.</li> <li>Edify provided an updated BDAR as part of the Submissions Report package to address CPHR's comments.</li> </ul>
<b>Fire and Rescue NSW (FRNSW)</b>	Recommended conditions of consent to require the development of a Fire Safety Study, Emergency Plan, Emergency Services Information Package and Emergency Responders Induction Package. The Department included these in the recommended conditions of consent.
<b>NSW Rural Fire Service (NSW RFS)</b>	Requested additional justification to support the location chosen for the centralised BESS option, noting that it would be located more than 1 km away from the site access point, and noted that the land is located in grassland fire hazard. Edify provided further justification and mitigation measures to address NSW RFS's concerns who raised no further issues in its comments on the Submissions Report.

Agency	Advice summary
TfNSW	<ul style="list-style-type: none"> <li>• Requested further information regarding: <ul style="list-style-type: none"> <li>– an additional intersection assessment for the intersection of Newell Highway / Eumungerie Road;</li> <li>– consideration of the use of rail crossings along the heavy vehicle routes; and</li> <li>– Oversize and Over mass (OSOM) vehicle studies to identify pinch points and vertical clearances.</li> </ul> </li> <li>• Edify provided an updated Transport Impact Assessment (TIA) as part of the Submissions Report to address TfNSW's comments.</li> </ul>
<b>Department of Primary Industries and Agriculture (DPI Agriculture)</b>	<p>Noted proposed mitigation measures are generally adequate to address agricultural impacts and land use conflicts. Recommended implementation of a grazing management plan, a 70% ground cover target, measures to mitigate biosecurity risks, and removal of all infrastructure upon decommissioning. Edify included these suggestions in the updated mitigation measures.</p>
<b>Water Group within NSW DCCEEW (Water Group)</b>	<ul style="list-style-type: none"> <li>• Requested: <ul style="list-style-type: none"> <li>– clarification on the project's water demand and supply;</li> <li>– confirmation of the licensing arrangements for any dams on site; and</li> <li>– methods of disposal of sewerage and identification of a local water utility that can service the site.</li> </ul> </li> <li>• Edify provided further information in the Submissions Report on these matters.</li> </ul>

40. Essential Energy, EnergyCo, Air Services Australia, Crown Lands, Water NSW, the Department of Primary Industries (Fisheries), the Siding Springs Observatory (SSO) and the Department of Regional NSW – Mining, Exploration and Geoscience (MEG) raised no concerns.

#### 4.4 Summary of public submissions

41. During exhibition, the Department received 83 public submissions, including 78 from individuals and five from interest groups, consisting of 81 objections and two in support.

42. Of the 83 public submissions, no individuals were located within 5 km of the project, with 7% being located 5-100 km away from the project and the majority of submitters (93%) being

located more than 100 km away from the project. Of the 93% of submissions made, 18 submissions were received from submitters interstate.

#### **4.4.1 Submissions in objection**

43. Public submissions objecting to the project cited a range of matters, with the key matters including the reliability of renewable energy and potential impacts on and loss of agricultural land, biodiversity impacts, visual amenity impacts, contamination risks, waste and bushfire risk.
44. The Department has undertaken a detailed assessment of these issues in **Section 5** of this report, including consideration of advice from government agencies and Councils.

#### **4.4.2 Submissions in support**

45. Two public submissions supported the project, stating the project is essential for transitioning from coal-powered energy and would assist with achieving zero emissions. It was noted the project would also provide social benefits to the community in the form of monetary investment, local employment and procurement opportunities.

### **4.5 Response to submissions**

46. Following the public exhibition period, the Department asked Edify to respond to issues raised in the submissions and advice received from government agencies. Edify provided a Submissions Report to the Department on 20 May 2025 (see **Appendix C**). The Department published the Submissions Report on the NSW Planning Portal and forwarded it to relevant government agencies and Councils for comment. The Australian Rail Track Corporation (ARTC) was also contacted but no comments were received.
47. There were no residual concerns raised by agencies following review of the Submissions Report.

### **4.6 Amendment Report**

48. Following consideration of DRC's comments, Edify amended its application to include a TWA facility as detailed in the Amendment Report (see **Appendix E**). The TWA would be capable of housing 250 workers. The location of the TWA is shown in **Figure 2** above and a comparison of the original and amended project is detailed within **Table 5**.

**Table 5 | Amendment comparison**

Aspect	EIS Project	Amended Project	Difference
<b>Project Site</b>	495	495	No change
<b>Development Footprint</b>	396	396	No change
<b>Schedule of Lands</b>	The project comprises one lot.	The project comprises one lot.	No change
<b>Targeted Capacity (Solar)</b>	100 MW	100 MW	No change
<b>BESS Capacity</b>	100 MW / 400 MWh	100 MW / 400 MWh	No change
<b>Construction Duration</b>	12-18 months	20 months	8 months
<b>Construction Workforce Accommodation</b>	Use of available rental and motel accommodation in Narromine and Dubbo.	TWA facility proposed on site to accommodate up to 250 workers.	250 person TWA facility introduced.
<b>Water Demand</b>	Five 45,000 litre (L) water supply tanks to be provided.  22 mega litres (ML) of water required during construction, comprising 18.9 ML of non-potable water and 3.1 ML of potable water	The TWA would include an additional 20,000 litre water supply tank.  Operation of the TWA would require an additional 62,500 L of potable water per day during peak construction.	An additional 20,000 L water tank to be provided for firefighting purposes within the TWA footprint.  An additional 62,500 L of potable water would be required per day during peak construction.
<b>Waste</b>	The main waste source would be generated from the cardboard packaging used to deliver solar panels to the site.	The TWA would generate an additional 2,250 kilograms (kg) of waste per day, along with 125 L of grease/oil.	An additional 2,250 kg of different forms of waste would be generated by the TWA, along with 125 L of grease/oil.

Aspect	EIS Project	Amended Project	Difference
<b>Operational Lifespan</b>	50 years	50 years (solar farm). The accommodation camp would be operational for the duration of the solar and battery project construction phase, which is anticipated to be 16 months.	TWA facility component included as separate to operational lifespan of the solar farm.

## 5 Assessment

49. The Department has undertaken a comprehensive assessment of the merits of the project. This report provides detailed discussions of the key issues, namely energy transition (Section 5.1), land use compatibility (Section 5.2), traffic and transport (Section 5.3) and accommodation (Section Accommodation5.4).

50. Several other issues have also been considered. These issues are considered relatively minor and are assessed in Table 7 in Section 5.5.

### 5.1 Energy Transition

51. The project aligns with a range of national and State policies (see Section 2), which identify the need to diversify the energy generation mix and reduce carbon emissions while providing energy security and reliability.

52. With a generating capacity of 100 MW, the project would generate enough electricity to power about 42,441 homes. This is consistent with the *NSW Climate Change Policy Framework* of achieving net zero emissions by 2050.

53. The inclusion of a battery (100 MW / 400 MWh) would enable the project to store energy for dispatch to the grid outside of daylight hours and/or during peak demand, increasing grid stability and energy security.

54. The project is located in the CWO REZ, which is a declared REZ. The project would contribute to the continued growth of renewable energy generation and storage capacity in the REZ, with direct access to the transmission network and abundant solar resources.

55. As such, the project would play an important role in:

- increasing renewable energy generation and capacity;
- firming the grid by including 100 MW / 400 MWh of energy storage; and
- contributing to the transition to a cleaner energy system as coal fired generators are retired.

## 5.2 Land use compatibility

### 5.2.1 Provisions of the LEP

56. The site is located on land within the RU1 Primary Production zone under Narromine LEP.

57. Under the Transport and Infrastructure SEPP, electricity generating works are permissible with consent on any land in a prescribed non-residential zone, including land zoned RU1 Primary Production.

58. In addition, based on a broader reading of the Narromine LEP, and consideration of the objectives of the RU1 zones and other strategic documents for the region, such as the Central West Orana Regional Plan 2041, and the Narromine Local Strategic Planning Statement 2020, the Department considers that there is no clear intention to prevent the development of a solar farm on the subject land.

59. The project is consistent with the objectives of the RU1 zoning under the LEP, particularly by:

- providing diversity in primary industry enterprises and systems appropriate for the area;
- minimising fragmentation and alienation of resource lands; and
- minimising conflict between land uses within this zone and land uses within adjoining zones.

60. Economically, Narromine Shire LGA has traditionally relied on agriculture. The introduction of solar energy generation would contribute to a more diverse local economy, thereby supporting the local economy and community.

61. Furthermore, the proposed solar farm would encourage renewable energy development which is consistent with key government strategic planning guidance, including the Central West and Orana Regional Plan 2036 and 2041, which includes an objective to promote renewable energy opportunities.

## 5.2.2 Potential Loss of Agricultural Land

62. The project has a development footprint of approximately 396 ha, the majority of which has been previously used for cropping. A total of 37 submissions objecting to the project raised concerns regarding establishing a solar farm on productive agricultural land.

63. Edify undertook a detailed assessment of the impact of the project on the local and regional agricultural industry and justification for the project considering lower impact alternatives, in accordance with the *Large Scale Solar Energy Guideline* (Solar Guideline). The Department has considered the principles within its assessment.

64. Edify's assessment concluded that the temporary impacts on agriculture are considered negligible in the context of the gross commodity values and land use coverage of the agricultural industries operating within the LGA, and noting impacts to existing agricultural activities within the site would be offset through financial compensation to the involved landowner. The landowner would also be able to continue their agricultural operations within lots surrounding the site throughout the life of the project.

65. Edify's assessment also verified the site is not mapped as BSAL and has Land and Soil Capability Mapping for NSW ranging between Class 3 to Class 6, as summarised in Table 6.

**Table 6 | Land capability classes**

Class	Description	Site (ha)	Development Footprint (ha)
<b>3</b>	Moderate limitations, suitable for grazing and cultivation with careful management of limitations	272.1 (55%)	225 (57%)
<b>4</b>	Moderate to severe limitations, suitable for grazing and occasional cultivation with management of practices	84.6 (17%)	70 (17.5%)
<b>5</b>	High limitations, suitable for grazing and some horticulture with careful management	95.9 (19%)	71 (18%)
<b>6</b>	Severe limitations, more suitable for grazing, occasional cultivation for fodder crops	42.3 (8.5%)	30 (7.5%)

66. The inherent agricultural capability of the land would not be affected by the project due to the relatively low scale of the development and Edify would be required to return the land back to existing levels of agricultural capability following decommissioning of the project.

Further, Edify has indicated that siting of permanent infrastructure has avoided higher quality land within the project with the BESS and substation being primarily located on class 6 land.

67. Regarding potential cumulative impacts, the project's development footprint, combined with the other proposed, approved and/or operational SSD solar farms in the Central West and Orana region (16,853 ha) would be approximately 17,249 ha. The loss of 17,249 ha of agricultural land represents a small proportion (0.19%) of the 8.9 million ha of land currently used for agricultural output in the CWO region. Given the nature and scale of the established agricultural industries within the region, significant impacts to regional agricultural infrastructure are unlikely to occur and the project would result in negligible reduction in overall productivity of the region.
68. The Department notes that DPI Agriculture did not raise concerns that the project would compromise the long-term use of the land for agricultural practices, subject to the removal of project infrastructure at decommissioning and either the implementation of agrisolar, or the maintenance of a 70% ground cover, if agrisolar is not implemented. These recommended management measures consider biosecurity risks, pests, weeds, soil degradation and land degradation to avoid long-term impacts associated with large-scale development of traditionally agricultural land. Edify has committed to the development of a Grazing Management Plan or Vegetation Management Plan in response to the recommendations made by DPI Agriculture.
69. The potential temporary loss of a small area of agricultural land in the region and other potential land use conflicts must be balanced against:
  - the broader strategic goals of the Commonwealth and NSW governments for the development of renewable energy into the future;
  - the environmental benefits of solar energy, particularly in reducing greenhouse gas emissions;
  - the economic benefits of solar energy in an area with good solar resources and capacity in the existing electrical network; and
  - the benefits of dispatchable energy for grid stability and reliability.
70. The Department considers the project would not fragment or alienate any resource lands in the LGA and that the land is capable of being returned to agricultural use following decommissioning. Further, the Department considers the project represents an effective and compatible use of the land within the region and that the site is suitable to accommodate the development.

### 5.2.3 Mitigation Measures and Recommended Conditions

71. The Department has recommended conditions requiring Edify to maintain the agricultural capability of the site, including establishing ground cover and maintaining grazing within the site where practicable. Edify would be required to fully reinstate the agricultural capability of the land following decommissioning of the project, including the requirement to return the development footprint to its existing land and soil capability. In addition, Edify has proposed a number of mitigation measures consistent with the Solar Guideline to reduce potential impacts and minimise land use conflict, including:

- ongoing consultation with stakeholders to identify and address concerns when they arise;
- implementing a Grazing Management Plan if agrisolar is adopted during operations, or develop a Vegetation Management Plan where agrisolar is not viable;
- implementing measures to minimise soil disturbance and erosion; and
- appropriate management of pest species and biosecurity risks.

72. The Department notes that DPI Agriculture was satisfied the project would not compromise the long-term use of the land for agricultural purposes, subject to the implementation of the mitigation measures described above and recommended conditions.

73. With the implementation of the recommended conditions and Edify's proposed mitigation measures, the Department considers that the project would not result in land use conflicts.

### 5.3 Traffic and Transport

74. Four submissions received during the EIS exhibition periods raised concerns about potential traffic impacts on local roads during the construction period, road damage and safety.

75. TfNSW initially provided comments in relation to additional intersection assessments, the use of rail crossings along heavy vehicle routes and further identification of pinch points along heavy vehicles requiring escort routes. NSC raised concerns regarding project vehicles travelling along Eumungerie Road and consideration of additional turn treatments that would be required to accommodate the project's traffic, including a Basic Left Turn treatment (BAL). DRC raised concerns regarding the proposed use of Burroway Road for heavy vehicle movements and requested it be upgraded to the most recent Austroads standards.

76. Construction of the project would involve delivery of plant, equipment and materials, including movement of heavy vehicles requiring escort, which, primarily during construction, has the potential to impact the local and regional road network.

77. In response to submissions and advice received from TfNSW and NSC and DRC, Edify amended its Traffic Impact Assessment to address these matters raised.

### **5.3.1 Traffic routes and site access**

78. Components for the project would be transported from Port of Newcastle via Newell Highway, Burroway Road (for use by heavy vehicles requiring escort and high-risk heavy vehicles requiring escort only) and Eumungerie Road. A second vehicle route has also been identified for heavy vehicles travelling to the site from Narromine, in accordance with the TfNSW Restricted Access Vehicle Map.

79. Edify initially proposed a third transport route from Port Botany for the project, however, this route was later removed following advice from Transport for NSW's Special Permits Unit (SPU), which identified key constraints. The SPU also advised that, for the Port of Newcastle route, any heavy vehicles requiring escort crossing the Strus Bridge over the Hunter River at Denman (Structure BN 1575) must be limited to a maximum axle load of 14.5 tonnes. In response, the Department has recommended a condition of consent to require Edify to seek all relevant approval needed before use of heavy vehicles requiring escort associated with the project.

80. The remaining two haulage routes proposed would utilise roads that are approved for use by B-Double vehicles. These routes avoid townships, which would minimise road noise and traffic impacts. All vehicles associated with the project were originally going to access the site via Eumungerie Road, using approved haulage routes via Newell Highway, Burroway Road and Dubbo-Burroway Road. However, in response to DRC's concerns, Edify has committed to avoiding the use of Burroway Road and Dubbo-Burroway Road by all heavy vehicles. Burroway Road would only be needed to facilitate the movement of three heavy vehicles requiring escort return movements only. All other heavy vehicles would access the site using the Narromine haulage route. DRC supported the change and NSC did not raise concerns with these amended access arrangements.

81. TfNSW did not raise concerns with the use of the Narromine haulage route, however, requested further traffic surveying to identify the network AM and PM peak hours for the Mitchell Highway / Manildra Street and Mitchell Highway / Warren Road intersections and mitigation measures to ensure vehicle movements at two intersections occur outside the network peak period. Accordingly, the Department has recommended a condition of consent to require Edify to prepare a Traffic Management Plan (TMP), including the provision of additional traffic surveying and the identification of measures to mitigate traffic impacts at the two intersections that would result from the project.

82. The two primary site access points along Eumungerie Road are shown in Figure 2. While both site access points would need to be used during pre-construction works, this application would only allow for the upgrade and use of one access point during the main construction stages. Edify has confirmed this arrangement and indicated the existing site access point would be closed if the other is built.

83. All vehicles would access the site from the south along Eumungerie Road by turning right into the site, with no traffic accessing the site from the north. As part of its submission on the EIS, NSC requested Edify to consider if travelling to and from the site only from the south would be a possibility and if a Basic Left Turn (BAL) treatment would be required to accommodate this turn movement. Edify confirmed all vehicles would be limited to travelling to the site from the south only. On this basis, the Department has recommended a condition of consent to this effect. NSC did not raise further concerns regarding this matter in its comments on the Submissions Report.

### 5.3.2 **Traffic volumes**

84. The main increase in project related traffic would occur during months 9-14 of the 20 month construction period. The construction of the TWA facility would occur prior to construction of the solar farm and BESS, over a period of approximately 8 weeks.

85. The estimated peak daily vehicle movements during construction would be up to 58 heavy vehicles and 44 light vehicles. Heavy vehicle movements would be highest during the months 9-14 of construction, reducing to 25 heavy vehicle movements during off-peak construction months. The traffic study demonstrated there is capacity on Eumungerie Road to accommodate background and project related traffic. A maximum of 11 heavy vehicle movements would be required per hour during peak construction. The project would also result in three heavy vehicles requiring escort movements during the construction, upgrading and decommissioning stages.

86. A construction workforce of approximately 250 personnel would be on-site during the peak construction phase, with workers being primarily sourced from Dubbo and Narromine.

87. As construction activities would be restricted to daytime hours, construction related vehicles would use the local road network during the day only. Heavy vehicles up to 26 metres in length would be used for transporting material and components to the site.

88. Traffic generation during operations would be significantly less than the construction phase, with only a small number of maintenance staff required that are expected to generate up to eight light vehicle movements per day and the occasional heavy vehicle movement for water servicing requirements.

### **5.3.3 Road upgrades**

89. Use of the existing or the proposed site access from Eumungerie Road would require sealed BAR turn treatment. NSC has reviewed the strategic design prepared for the site access and raised no concerns following Edify's commitment to limit vehicles to turn right into the site only.
90. The Department is satisfied with the road upgrades proposed and has conditioned the application accordingly.

### **5.3.4 Cumulative impacts**

91. As discussed in Section 2.2, there are two proposed renewable energy projects within 50 km of the project (i.e. Narromine BESS and Wallaby Creek Wind Farm). A section of the ARTC Inland Rail Project would also be located along Eumungerie Road, in proximity to the site.
92. Joint traffic impacts of the project and the Inland Rail project have the potential to create an 8.7% increase in traffic during the peak construction period, however the TIA prepared for the project found the State road network has sufficient capacity to accommodate construction traffic of the proposed projects.
93. Edify has committed to ongoing consultation with the applicants of nearby projects to manage vehicle movements and the preparation of a traffic management plan, which would outline a range of traffic management measures in order to ensure the construction traffic would have a minimal impact to the capacity and safety of the surrounding road network.
94. The Department has included a requirement for a TMP, including provisions to minimise potential cumulative traffic impacts during construction to ensure the site access intersection treatment is appropriate. Edify has also committed to reducing project related traffic by using shuttle buses. TfNSW and the Department are supportive of this approach and the commitments made by Edify.

### **5.3.5 Recommended conditions**

95. Subject to the recommended conditions, the Department, NSC, DRC and TfNSW are satisfied the project would not result in significant impacts on road network capacity, efficiency or safety. The Department has recommended conditions of consent requiring Edify to:
  - undertake relevant road upgrades prior to commencement of construction;
  - require all vehicles associated with the project to enter and exit the site from the south via Eumungerie Road;

- restrict the number of vehicles during construction, upgrading and decommissioning to the identified peak volumes;
- ensure length of vehicles (excluding heavy vehicles requiring escort) don't exceed 26 metres; and
- prepare and implement a TMP in consultation with TfNSW, NSC and DRC, including provisions for dilapidation surveys along Burroway Road, Dubbo-Burroway Road, Warren Road and Eumungerie Road, the operation of shuttle buses, and details of the measures that would be implemented to address road safety.

## 5.4 Accommodation

96. Up to 250 workers would be required during the peak construction period (about six months). One public submission raised concerns regarding the employment of workers outside of the Narromine LGA, however, as part of their EIS, Edify committed to maximising local employment opportunities for workers within the local community to reduce pressure on local accommodation and services. This would be facilitated through the development of an Accommodation and Employment Strategy (AES) before the commencement of construction. NSC supported this approach.

97. As part of their EIS package, Edify provided a Social Impact Assessment which assessed the social impacts of the proposed development, particularly on local businesses and the economy. The SIA identified the likelihood of increased pressure on accommodation availability, and the reduction of available rental and short-term accommodation, however, Edify's assessment concluded there is sufficient accommodation in Narromine and Dubbo to accommodate the project construction workforce.

98. NSC did not raise concerns regarding the use of local accommodation, subject to their involvement in the development of the AES, however, DRC raised concerns regarding the use of rental accommodation within their LGA and noted there is limited rental accommodation available to service the project's workforce. It requested further consideration and assessment of accommodation availability.

99. To address DRC's concerns, Edify amended the project to include the provision of a TWA facility.

### 5.4.1 TWA facility

100. Edify proposed a TWA facility through the Amendment Report to address potential impacts on accommodation availability in the area. The proposed TWA facility would house up to 250

construction staff and would require 10-15 servicing staff, accommodated in local regions during the 20 month construction phase of the project.

101. The addition of the TWA facility would reduce potential cumulative impacts on local traffic and the availability of short-term accommodation in the local and regional area.

#### **5.4.2 TWA servicing arrangements**

102. Edify has demonstrated means of servicing the TWA in relation to water, sewage, waste, electricity and medical services as follows:

- Water supply options and regulatory pathways have been identified to support the water requirements of the project. Edify has detailed the required water demands of the project and demonstrated that NSC would be able to meet these demands.
- Edify has identified two sewage treatment options, being an on-site sewage treatment plant, or collection and disposal of sewage to the Dubbo Sewage Treatment Plant, subject to availability and competing demand at the time of disposal. The Department is satisfied that feasible options for treating sewage are available.
- Edify has consulted with Trangie Waste Facility confirming capacity to accept most waste generated during construction and operation of the project, with NSC capable of accepting remaining anticipated waste. The Department has recommended condition a condition of consent to require Edify the preparation of a Waste Management Plan (WMP) prior to construction commencing.
- Edify has proposed that an on-site medical and first aid room would be established. Additionally, Edify has proposed the implementation of a telehealth service for workers, offering virtual access to a general practitioner. NSW Health have recommended a nurse be present on site everyday, with at least telehealth access to a GP. The Department supports NSW Health's request and has recommended a condition of consent to ensure Edify provide appropriate access to an onsite prescribing nurse and GP, in consultation with NSW Health.
- Electricity for the TWA facility would be generated on-site via diesel generators.
- Edify has also committed to employing security personnel who would be present on site at all times.

#### **5.4.3 Conclusion**

103. Edify has committed to engage with NSC, DRC and the local community to develop the AES prior to commencing construction to provide a detailed review of the level of current

workforce being accommodated in the region on projects which have already begun construction and how this is impacting occupancy rates.

104. The Department is satisfied that the proposed TWA facility is capable of being effectively serviced, with final details of the provision of services to be determined through the post approval stage of development, prior to construction. Accordingly, the Department considers the proposed TWA facility to be a suitable means of mitigating potential increased demand for housing and associated residential services in the region.
105. On this basis, the Department is satisfied the project has been designed to minimise opportunities for cumulative traffic and accommodation impacts, noting the project's location in the CWO REZ. The Department considers that with the provision of a TWA, implementation of an AES, and considering the short-term nature of construction, potential impacts on housing and short-term accommodation availability can be appropriately mitigated and managed.

#### **5.4.4 Recommended conditions**

106. In addition to specific traffic, amenity and operating conditions, the Department has recommended conditions of consent requiring Edify to:
  - prepare an AES, before the commencement of construction, in consultation with both NSC and DRC, prior to the commencement of construction;
  - prepare an Accommodation Camp Management Plan in consultation with NSC and DRC prior to commencing construction of the TWA facility; and
  - ensure utilities at the TWA facility, including water, wastewater, waste and electricity, are designed and located in accordance with NRC's specifications.

## 5.5 Other issues

107. The Department's consideration of other issues is summarised in Table 7 below.

**Table 7 |** Assessment of other issues

Issue	Recommended conditions
<b>Biodiversity</b> <ul style="list-style-type: none"><li>Thirty-seven public submissions raised concerns regarding impacts to biodiversity on site.</li><li>The project would have a development footprint of 396 ha and has been designed to avoid impacts to remnant vegetation, except for upgrades along Eumungerie Road which are required to enable site access.</li><li>The project would have a limited impact to the site's biodiversity. The required road upgrade works would require the clearing of 0.11 ha of one Plant Community Type (PCT), <i>PCT 55 – Belah Woodland on alluvial plains and low rises in central NSW wheatbelt to Pilliga and Liverpool Plains region</i> (PCT 55). This would require the clearing of one mature tree, a small amount of woody regrowth, and derived native grassland (DNG).</li><li>In its comments on the EIS, CPHR requested further justification to support the categorisation of vegetation as PCT 55, rather than an alternate PCT. Edify provided further justification in an amended BDAR which was submitted to CPHR who accepted Edify's response and raised no further concerns.</li><li>Sixteen ecosystem credit species were associated with PCT 55. One was determined not to be onsite, and the 15 others were assumed present, resulting in a total of two ecosystem credits that Edify must offset prior to carrying out any development that could impact biodiversity values on site.</li><li>Public submissions raised specific concerns regarding potential impacts to the Silver Leaf Mountain Gum, Latham's Snipe and the Eastern Curlew. Within their BDAR, Edify assessed and identified all potential flora and</li></ul>	<ul style="list-style-type: none"><li>Prior to carrying out any development that could directly or indirectly impact the biodiversity values requiring offset, Edify must retire the biodiversity credits.</li><li>Prior to carrying out any development that could directly or indirectly impact biodiversity values, Edify must prepare a Biodiversity Management Plan.</li></ul>

Issue	Recommended conditions
<p>fauna species that do or could potentially occur on site. Silver Leaf Mountain Gum, Eastern Curlew and Latham's Snipe were not found on the site due to the absence of appropriate wetlands on site, which is their usual habitat.</p> <ul style="list-style-type: none"> <li>CPHR did not raise concerns regarding the potential candidate species that were assessed as part of the BDAR. On this basis, the Department supports the findings of the BDAR and considers that the project would not result in adverse impacts to the Silver Leaf Mountain Gum, Latham's Snipe and the Eastern Curlew.</li> <li>The TWA facility has been located to avoid biodiversity values on site.</li> <li>On this basis, and with the recommended conditions, the Department considers the project would not result in adverse impacts to the site or surrounding locality's biodiversity values.</li> </ul>	

## Heritage

### Aboriginal Cultural Heritage

- Edify has undertaken surveys of the project site in consultation with Registered Aboriginal Parties (RAPs).
- Surveys identified 15 Aboriginal cultural heritage sites, comprising of four artefact scatters and 11 isolated finds. All recorded sites have been evaluated to be of high cultural significance but of low archaeological and aesthetic value.
- The project would directly impact five of the fifteen sites, comprising of one low density artefact scatter and four isolated finds. The remaining ten sites fall within site exclusion zones and would be avoided, with one item, Kookaburra OS3 requiring fencing due to its proximity to project infrastructure. The TWA has been located to avoid further impacts to Aboriginal cultural heritage.
- Prior to the commencement of construction, the five impacted sites would be salvaged in accordance with a Heritage Management Plan (HMP) that would be prepared in consultation with RAPs and Heritage NSW.

- Prior to commencing construction, prepare a HMP for the development. The plan must include a description of measures that would be implemented to avoid harm to all objects/sites located outside the identified development footprint and a surface collection and salvage methodology for the relevant Aboriginal

Issue	Recommended conditions
<ul style="list-style-type: none"> <li>The HMP would also include an unexpected finds procedure which would be followed should any Aboriginal artefacts or skeletal material be identified during construction.</li> <li>Heritage NSW did not raise concerns with the Aboriginal cultural heritage impacts of the project. On this basis, and with the implementation of these measures, the Department considers that the project is unlikely to result in significant impacts on the Aboriginal heritage values of the locality.</li> </ul>	<p>objects and sites identified for collection.</p> <ul style="list-style-type: none"> <li>Edify must ensure the development does not cause direct or indirect impacts on Aboriginal heritage items located outside of the approved development footprint.</li> <li>Prior to the commencement of construction, Edify must prepare a Chance Finds Protocol in consultation with RAPs and Heritage NSW.</li> </ul>
<p><u>Historic Heritage</u></p> <ul style="list-style-type: none"> <li>No heritage items listed on Commonwealth, National, or State registers are located within or surrounding the site.</li> <li>Site inspections identified one item of historic heritage on the site, the Kookaburra homestead complex (Kookaburra-HS01). The homestead was identified as having no significant heritage value and would not be impacted by the project.</li> <li>The Department considers that the project would not have any adverse impacts on local heritage items in the area.</li> </ul>	
<p><u>Visual</u></p> <p><u>Visual</u></p> <ul style="list-style-type: none"> <li>Fifteen submissions raised concerns regarding potential visual impacts associated with the project and its impact on the rural landscape.</li> <li>The area surrounding the site is primarily characterised by agricultural rural landscapes and open spaces.</li> </ul>	<ul style="list-style-type: none"> <li>Minimise off-site visual impacts of the development.</li> <li>Ensure the visual appearance of ancillary infrastructure (including</li> </ul>

Issue	Recommended conditions
<ul style="list-style-type: none"> <li>There are four non-associated receivers within 2 km of the site. The closest receiver (R1) is approximately 1.8 km away.</li> <li>The visual impact assessment prepared for the project, undertaken in accordance with the Solar Guideline, found the predicted visual impact on all four residential receivers would be negligible due to distance, topography and intervening vegetation.</li> <li>Edify's visual assessment also considered the project's impact on 12 public viewpoints within 5 km of the site. All identified viewpoints were along public local and regional roads surrounding the site. The viewshed analysis determined the project would have a very low to low visual impacts to identified public viewpoints, including with the provision of the TWA facility.</li> <li>The site is located within 200 km of the Dark Sky region from the Siding Spring Observatory, as such, Edify has committed to not utilising any permanent night lighting within the solar farm, unless needed for maintenance or in the event of an emergency. The SSO did not raise any concerns with the application. Further, lighting for the TWA would point inwards to minimise any potential impacts.</li> <li>The Department considers the visual impacts associated with the project are negligible and can be appropriately mitigated with the management measures and recommended conditions of consent.</li> </ul>	<ul style="list-style-type: none"> <li>the TWA facility) blends in as much as possible with the surrounding landscape.</li> <li>Minimise off-site lighting impacts of the development.</li> <li>Consider the impacts of the development on the nearby Narromine to Narrabri Inland Rail Project.</li> </ul>
<p><u>Glare</u></p> <ul style="list-style-type: none"> <li>Edify's glare assessment demonstrated that glare impacts would not be experienced by any residences or public roads surrounding the development.</li> <li>However, it was noted ARTC's Narromine to Narrabri section of the future Inland Rail project would be located within 1 km of the project, along the western side of Eumungerie Road. Limited public information available at the time hindered Edify's ability to assess potential impacts of the project on the future Inland Rail. Nonetheless, the Department notes no glint and glare impacts would be experienced by road users travelling from both directions along Eumungerie Road.</li> </ul>	

Issue	Recommended conditions
<ul style="list-style-type: none"> <li>Edify's assessment recommended the development of an Environmental Management Plan which would require Edify to undertake further glare assessment once detailed documentation for the relevant section of the Inland Rail is made available. The Department has recommended a condition of consent to require consideration of the project's glare impacts to this portion of the Inland Rail.</li> <li>Subject to the recommended conditions, the Department is satisfied the project would not cause significant glint or glare to nearby residences, road or rail users or aircraft.</li> </ul>	
<p><b>Noise</b></p> <ul style="list-style-type: none"> <li>Four submissions raised concerns regarding potential noise impacts of the project.</li> <li>Edify's Noise and Vibration Assessment (NIA) indicates that construction noise would be below the project noise trigger levels and well below the 'highly noise affected' criterion of 75 dB(A) in the EPA's <i>Interim Construction Noise Guideline</i> (the ICNG) at all non-associated residents.</li> <li>Edify's assessment also provided noise modelling to assess both the centralised and distributed BESS options. Modelling found that operational noise from both BESS design options would comply with the project noise trigger levels under the <i>NSW Noise Policy for industry</i> (EPA, 2017) at all non-associated receivers.</li> <li>Notwithstanding, Edify has committed to a range of noise mitigation measures to prevent the occurrence of unexpected noise issues, including locating all potential noise-generating infrastructure, in particular the substations and BESS facilities, at an appropriate distance away from nearby non-associated residences. Edify has also committed to the development of a Construction Noise Management Plan to further mitigate noise impacts during construction.</li> <li>Edify's updated noise assessment submitted as part of the Amendment Report also predicted noise levels for the plant associated with the operation of the TWA facility to be below the night-time noise management level (NML) of 35 dB(A) LAeq (15 min).</li> </ul>	<ul style="list-style-type: none"> <li>Minimise noise generated by the construction, upgrading or decommissioning activities on site in accordance with best practice requirements outlined in the ICNG.</li> <li>Comply with the noise management levels as derived from the <i>NSW Noise Policy for Industry</i> (EPA, 2017) at any non-associated residence.</li> <li>Restrict construction hours to Monday to Friday, 7 am –</li> </ul>

Issue	Recommended conditions
<ul style="list-style-type: none"> <li>Road traffic noise during construction and operation along Eumungerie Road would comply with the relevant criteria in the EPA's <i>Road Noise Policy</i> (RNP).</li> <li>Vibration impacts from construction works would not impact any nearby receivers and no operation ground vibration sources were identified.</li> <li>The Department considers that noise generated during construction and operation of the project can be appropriately managed through implementation of the proposed mitigation measures and adherence with the recommended conditions.</li> </ul>	6 pm and Saturday, 8 am – 1 pm.
<h3>Water and Erosion</h3> <p><u>Flooding and Surface Water</u></p> <ul style="list-style-type: none"> <li>The site is not mapped as flood prone land and does not contain any water bodies, apart from several manmade dams. The nearest watercourse is Kookaburra Creek, located seven km to the west of the site.</li> <li>Edify has committed to placing temporary stockpiles away from any potential water flow paths to minimise impacts to onsite water behaviour.</li> <li>None of the government agencies consulted with raised specific concerns in relation to the flood impacts of the project. However, on the Amendment Report NSW State Emergency Services (NSW SES) recommended further consideration of emergency management plans during flood events to address potential road closures along Dubbo-Burroway Road, Burroway Road and Warren Road. As such, in discussions with NSW SES, the Department has recommended conditions of consents to require the preparation of a flood response plan as part of the TMP and NSW. NSW SES are satisfied the updated recommended conditions of consent.</li> <li>As such, the Department considers the potential additional flood impacts associated with the project to be minor and acceptable. Further, subject to the preparation and implementation of the flood response plan, the Department and NSW SES are satisfied that the flood risk could be appropriately managed.</li> </ul>	<ul style="list-style-type: none"> <li>Prepare a flood response plan, as part of the TMP, detailing procedures and options for safe access to and from the site in the event of flooding.</li> <li>Design, construct and maintain the development in a manner that does not materially alter the flood storage capacity, flood flows or hydrological characteristics of the site or surrounds.</li> </ul>

Issue	Recommended conditions
<p><u>Groundwater</u></p> <ul style="list-style-type: none"> <li>The project is not expected to affect groundwater resources, including groundwater dependent ecosystems, due to limited excavation depths during construction.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure the solar panels and ancillary infrastructure do not cause impacts from any increased water being diverted off the site or alter hydrology off site.</li> </ul>
<p><u>Water Supply</u></p> <ul style="list-style-type: none"> <li>Three public submissions questioned the water supply requirements for the project.</li> <li>In its advice on the EIS, Water Group requested that Edify quantify site water demands during construction and operation, along with any licensing arrangements for dams on site.</li> <li>Edify's amended water assessment identified the project would require a total of 76 mega litres (ML) of water during construction, comprising 38 ML of non-potable water and 38 ML of potable water. An additional 350 to 500 kilolitres (kL) of water would be required during operation each year for cleaning, maintenance and staff amenities.</li> <li>In consultation with NSC, Edify clarified its ability to obtain sufficient water volumes to satisfy the project's water demand from three Council owned water sources, including a potable water standpipe (ie structures connected to water supply) on Nymagee Street and raw water standpipes on McGrane Way and at Narromine Wetlands dam, which are all within 18 to 20 km of the site.</li> <li>Once operational, water requirements would either be trucked to the site or provided via stormwater collection or the use of two 35 kL water storage tanks.</li> <li>The site would also contain five 45,000 L water tanks, for bushfire and other non-potable uses. Another 20,000 L tank would be set aside for use during operation.</li> <li>Subject to the recommended conditions, the Department considers that the project would not result in significant impacts on water resources.</li> </ul>	<ul style="list-style-type: none"> <li>Prepare a Soil and Water Management Plan.</li> <li>Minimise any soil erosion and control sediment generation in accordance with the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual and ensure the project is constructed and maintained to avoid causing erosion on site.</li> </ul>
<p><u>Erosion and Sediment Control</u></p>	

Issue	Recommended conditions
<ul style="list-style-type: none"> <li>Water Group and DPI Agriculture made specific recommendations in relation to managing potential erosion and sedimentation risks associated with the project.</li> <li>Sodic subsoils at the proposed BESS location and switchyard areas present the greatest erosion risk on site.</li> <li>Edify has committed to preparing an Erosion and Sediment Control Plan and would implement temporary erosion measures to manage any potential overland water flow and stormwater run-off, in accordance with the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) and <i>International Erosion Control Association Australasia Guidelines</i>.</li> <li>In response to DPI Agriculture's recommendations, Edify has also committed to the development of a Vegetation Management Plan (VMP), if agri-solar is not feasible on site. The VMP would provide ground cover maintenance measures to guide the establishment and maintenance of 70% groundcover duration operation.</li> <li>The Department considers that any erosion and sedimentation risks associated with the project could be effectively managed by complying with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual and the <i>Managing Urban Stormwater: Soils and construction – Volume 2A manual</i> (Landcom, 2008).</li> </ul>	
<b>Dust</b> <ul style="list-style-type: none"> <li>One public submission raised concerns regarding potential air quality impacts as a result of the development.</li> <li>Construction of the project involves earthworks for site preparation, vegetation clearance, and construction of road upgrades. Other sources of dust would include vehicles travelling on unsealed roads and wind-blown emissions during operations.</li> <li>Edify has committed to managing dust generated during construction of the project by implementing standard dust control measures in accordance with the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom,</li> </ul>	<ul style="list-style-type: none"> <li>Minimise the dust generated by the development.</li> <li>Prepare and implement a TMP, which includes measures to minimise dust</li> </ul>

Issue	Recommended conditions
<p>2004), including watering of unsealed roads and exposed surfaces during road upgrade works. Edify would manage traffic-related dust generation through the implementation of a TMP.</p> <ul style="list-style-type: none"> <li>• The Department considers the likelihood of dust generation during operation of the project is low given the distance of the project from receivers and that ground cover would be quickly established across the site.</li> <li>• The Department considers that dust generated during construction and operation of the project could be appropriately managed through implementation of the proposed mitigation measures and adherence with the recommended conditions.</li> </ul>	generated by construction traffic.
<p><b>Hazard and Bushfire risk</b></p> <p><u>Bushfire</u></p> <ul style="list-style-type: none"> <li>• The site is located on bushfire prone land, as such Edify prepared a Bushfire Strategic Study and would be required to comply with the RFS's <i>Planning for Bushfire Protection 2019</i> (PFB 2019).</li> <li>• The Bushfire Strategic Study identified that parts of the site are located within the Category 2 land, with no Category 1 land.</li> <li>• In its comments on the EIS, RFS raised concerns regarding the distance of the centralised BESS option from the site entry point and required further justification from a fire protection perspective.</li> <li>• Edify provided further justification regarding the proposed BESS location in the Submissions Report, which committed to providing five 45,000 L water tanks throughout the site, rather than one 20,000 L water tank, for firefighting purposes to be available on site at all times. The Submissions Report was sent to RFS for comments, who raised no further concerns.</li> <li>• Edify also provided a bushfire assessment to consider the impact of the TWA facility and found the acceptable solutions to satisfy the aims and objectives of PFB 2019 by establishing and maintaining appropriate asset</li> </ul>	<ul style="list-style-type: none"> <li>• The centralised BESS must not exceed a total storage capacity of 400 MWh across the project site and must be installed in an arrangement consistent with the EIS.</li> <li>• The decentralised BESS must not exceed 20 MWh of energy storage collocated.</li> <li>• Minimise the fire risks of the development, including</li> </ul>

Issue	Recommended conditions
<p>protection zones and defendable space, access, water supply, and emergency management arrangements. FRNSW and RFS did not raise concerns regarding the amended application.</p> <ul style="list-style-type: none"> <li>The Department considers that the bushfire risks could be suitably controlled through the implementation of standard fire management procedures and recommendations made by FRNSW and RFS, to which Edify has committed, including: <ul style="list-style-type: none"> <li>measures including APZs in accordance with <i>Planning for Bushfire Protection 2019</i>;</li> <li>preparation of a Fire Safety Study (FSS) in consultation with FRNSW;</li> <li>preparation of an Emergency Services Information Package (ESIP) in accordance with relevant FRNSW guidelines; and</li> <li>development and implementation of a comprehensive Emergency Plan (EP).</li> </ul> </li> </ul>	<p>managing vegetation fuel loads on-site.</p> <ul style="list-style-type: none"> <li>Prepare a FSS and an EP for the development.</li> <li>Ensure the project complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2019</i> and Standards for APZs.</li> </ul>
<p><u>Hazard</u></p> <ul style="list-style-type: none"> <li>Edify prepared a Preliminary Hazards Analysis (PHA) in accordance with <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (Resilience and Hazards SEPP). The PHA provided recommendations for the appropriate BESS separation distances, including in relation to radiant heat, overpressure, toxic release and electromagnetic fields. The PHA concluded that the project is not considered to be potentially offensive with respect to the Resilience and Hazards SEPP.</li> <li>Following review of the EIS and PHA, the Department considers that: <ul style="list-style-type: none"> <li>dangerous goods stored on-site would unlikely exceed the threshold limits in <i>Hazardous and Offensive Development Application Guidelines – Applying SEPP 33</i>;</li> <li>the project is not 'potentially hazardous' as per the Resilience and Hazards SEPP relating to the storage of dangerous goods; and</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Ensure the quantities of dangerous goods stored and handled at the site are below the threshold quantities listed in the Department's <i>Hazardous and Offensive Development Application Guidelines – Applying SEPP 33</i> at all times.</li> <li>All chemicals, fuels and oils to be stored in accordance with Australian</li> </ul>

Issue	Recommended conditions
<ul style="list-style-type: none"> <li>– the project meets the qualitative risk criteria outlined in the Department's <i>Hazardous Industry Planning Advisory Paper No. 4 'Risk Criteria for Land Use Safety Planning'</i>.</li> <li>• The Department is satisfied that all avoidable risks have been avoided and the risks from a major hazard have been reduced by separation to nearby residents. The Department also notes that there are no existing high-risk installations nearby.</li> <li>• Subject to the recommended conditions, and implementation of the management measures committed to by Edify, the Department considers that the risks associated with the project can be adequately managed.</li> </ul>	<ul style="list-style-type: none"> <li>Standards and EPA requirements.</li> <li>• Prepare an unexpected finds procedure to ensure potentially contaminated materials are appropriately managed.</li> </ul>
<p><u>Contamination</u></p> <ul style="list-style-type: none"> <li>• Twenty-seven public submissions raised concerns regarding contamination.</li> <li>• Edify considered contamination within the EIS, which included a contaminated land search and search of the public register of the <i>Protection of the Environment Operations Act 1997</i>. Both searches indicated the site does not contain any listed contamination sites.</li> <li>• The Department has considered the contaminated land provisions of the Resilience and Hazards SEPP and requested that Edify prepare a preliminary site investigation (PSI) into potential contamination across the site. Edify provided a PSI which involved a site inspection, conducted by a suitably qualified and experienced contaminated land consultant, to identify potential sources of contamination.</li> <li>• The PSI found no records of significant potentially contaminating activities or commercial/industrial activities on site and concluded that the land is unlikely to contain significant contamination. However, the PSI did identify old building materials which may contain asbestos and recommended they be removed by a licensed demolition contractor.</li> </ul>	

Issue	Recommended conditions
<ul style="list-style-type: none"> <li>The PSI report also recommended an unexpected finds protocol, should suspected asbestos be encountered on the site. Edify has committed to implement an unexpected finds protocol to manage any contamination that may be uncovered during earthworks across the site.</li> <li>Noting the outcomes of the PSI, the Department considers that the proposed use of the land is not intensive and low risk, even if historical contamination is identified, noting that during operations only a very small number of people would be required to access the site on any regular basis.</li> <li>Regarding the possible contamination of the site from the solar farm itself, the Department's <i>Frequently Asked Questions – Large Scale Solar Guideline</i> document outlines that the use of metals in solar panels has not been found to pose a risk to the environment as they are enclosed in thin layers between sheets of glass or plastic within the solar panel. To readily release contaminants into the environment, solar panels would need to be ground to a fine dust. As such, contamination of soil resulting from the project is not expected.</li> <li>Accordingly, the Department considers that the contamination risks from the project are minimal and can be appropriately managed.</li> </ul>	
<h3 data-bbox="188 901 1657 981">Waste</h3> <p><u>Waste Management</u></p> <ul style="list-style-type: none"> <li>NSC raised concerns regarding the proposed waste management on site. Sixteen submissions also raised concerns regarding the project waste management.</li> <li>The TWA facility would generate approximately 2,250 kg of waste per day during the peak of its operations (6 months of the 20 month construction period).</li> <li>Edify has identified waste treatment facilities capable of accepting most waste streams to be produced by the development within the Narromine Shire LGA. Edify contacted NSC who confirmed the Trangie Waste Facility is</li> </ul>	<ul style="list-style-type: none"> <li>Prepare a WMP prior to commencing construction.</li> <li>Minimise the waste generated by the development.</li> <li>Classify all waste generated on site in accordance with the EPA's</li> </ul>

Issue	Recommended conditions
<p>able to receive construction and general waste types generated by the project. NSC raised no further concerns regarding waste in its comments on the Submissions Report.</p> <ul style="list-style-type: none"> <li>Edify has committed to preparing and implementing a WMP in consultation with both NSC and DRC, which would be utilised to develop construction, operation and decommissioning waste management plans and include measures to minimise waste and to guide the recycling, reuse and disposal of materials.</li> </ul>	<p><i>Waste Classification Guidelines 2014 (or its latest version).</i></p> <ul style="list-style-type: none"> <li>Store and handle all waste on site in accordance with its classification.</li> </ul>
<p><u>Sewage</u></p> <ul style="list-style-type: none"> <li>NSW DCCEEW Water required further information regarding sewerage management for the site.</li> <li>The TWA facility is anticipated to produce approximately 62,500 L of wastewater per day over the duration of the peak construction period. Edify intend to service the site via one of two options: <ul style="list-style-type: none"> <li>an on-site sewage treatment system; or</li> <li>collection in a septic holding tank and delivery of liquid waste to a licensed facility with capacity to take sewage.</li> </ul> </li> <li>Edify may also investigate opportunities to treat and reuse water onsite using the onsite treatment plant (if provided) to service the project's non-potable water demand during construction. Alternatively, DRC have indicated the Dubbo Sewage Treatment Plant may be capable of servicing the site.</li> <li>Alternatively, Edify advised it had consulted with NSC and DRC regarding sewerage management who recommended use of the Dubbo Sewerage Treatment Plant as there are no septic receival stations available in Narromine. Edify confirmed they contacted the Dubbo Sewerage Treatment Plant who indicated they can accept liquid waste associated with the project. DCCEEW Water reviewed the Submissions Report, Amendment Report and draft conditions of consent and did not raise any further concerns regarding liquid waste management measures.</li> <li>The Department considers that project-related waste can be effectively managed with the implementation of the proposed mitigation measures and recommended conditions of consent.</li> </ul>	<ul style="list-style-type: none"> <li>Remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.</li> </ul>

Issue	Recommended conditions
<b>Community Benefit</b>	
<ul style="list-style-type: none"> <li>The Department considers that, in addition to its contribution to its energy transition, the project would generate direct and indirect benefits to the local community, including: <ul style="list-style-type: none"> <li>up to 250 construction workers would be required during the 6-month peak construction period. Workers would be primarily locally sourced from Narromine and Dubbo;</li> <li>expenditure on business in the local economy;</li> <li>the procurement of goods and services by Edify and associated contractors; and</li> <li>the Department considers that the project would not result in any significant or widespread reduction in land values in areas surrounding the project.</li> </ul> </li> <li>Further, Edify has reached an in-principle agreement with NSC to enter into a voluntary planning agreement (VPA) in accordance with the <i>NSW Benefit Sharing Guideline</i>, consisting of approximately \$85,000 paid annually and adjusted for consumer price index, with \$72,250 paid directly to NSC and \$12,570 dedicated towards a community benefit fund, managed by Edify, to be dedicated to the local community, in consultation with NSC.</li> <li>The project is unlikely to result in significant demand on community services and infrastructure given the relatively low level of local employment generated once it is operational.</li> <li>The Department considers that the project would have a positive socio-economic impact on the local community.</li> </ul>	<ul style="list-style-type: none"> <li>Edify implement its offer to enter into a planning agreement with NSC.</li> <li>Prepare an AES for the project in consultation with NSC and DRC, with consideration to prioritising the employment of local workers.</li> </ul>
<b>Land Value</b>	<ul style="list-style-type: none"> <li>One public submission received during the exhibition period raised concerns regarding property devaluation.</li> <li>The Department considers that the project would not result in any significant or widespread reduction in land values in areas surrounding the project.</li> </ul>

Issue	Recommended conditions
<ul style="list-style-type: none"> <li>• The Department notes that: <ul style="list-style-type: none"> <li>– the project is permissible under the Transport and Infrastructure SEPP;</li> <li>– a detailed assessment of the merits of the project has found that the project is unlikely to generate significant economic, environmental or social impacts;</li> <li>– the impacts of the project can be further minimised by imposing suitable conditions on the project, and requiring a range of standard mitigation measures;</li> <li>– the Department considers that the visual impacts of the project on the surrounding residences and road users would be minor and not be significant; and</li> <li>– the Land and Environment Court has ruled on several occasions that the assessment of the impacts of projects on individual property values is not generally a relevant consideration under the EP&amp;A Act, unless the project would have significant and widespread economic impacts on the locality, which is not the case in this instance.</li> </ul> </li> </ul>	
<b>Insurance</b> <ul style="list-style-type: none"> <li>• Four public submissions received during the exhibition period raised concerns regarding increased insurance costs.</li> <li>• The Department notes that the Insurance Council of Australia is not aware of any instances where Insurance Council Members have been unable to provide insurance or have increased premiums as a result of a farm (or a neighbouring property) hosting energy infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>• No specific conditions required.</li> </ul>
<b>Subdivision</b>	

Issue	Recommended conditions
<ul style="list-style-type: none"> <li>Edify requires subdivision for the project for an area of approximately 1.91 ha (as shown in <b>Figure 3</b>). Subdivision is required to transfer the ownership of the switchyard and grid connection infrastructure to Essential Energy once commissioned.</li> <li>The proposed subdivision would be below the minimum lot size of 400 ha identified in the Narromine LEP. Under section 4.38(3) of the EP&amp;A Act, development consent for the project can be granted despite the subdivision component of the application being prohibited by the LEP.</li> <li>NSC did not raise any concerns with the proposed subdivisions and indicated it supported the proposed subdivision throughout its discussions with Edify on the EIS.</li> <li>The Department considers that the subdivision should be approved as it: <ul style="list-style-type: none"> <li>is necessary for the operation of the project (including the substation);</li> <li>would not result in any additional dwelling entitlements on the subdivided lots; and</li> <li>is consistent with the key objects of the RU1 zone as it would encourage diversity and primary industry enterprises and minimises conflict between land uses.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Subdivide the proposed land in accordance with requirements of the EP&amp;A Act, EP&amp;A Regulation and the <i>Conveyancing Act 1919</i> (NSW).</li> </ul>
<h4 data-bbox="188 957 1657 1029">Decommissioning and Rehabilitation</h4> <ul style="list-style-type: none"> <li>The operational life of the project is 50 years, however there is potential to operate for a longer period of time if solar panels are upgraded over time, which would be permitted under the recommended conditions of consent.</li> <li>The Solar Guideline identifies four key decommissioning and rehabilitation principles for circumstances where an applicant ceases operating a project. These are: the removal of project infrastructure, returning the land to its pre-existing use, including rehabilitating and restoring the pre-existing LCS Class where previously used for agricultural purposes, and the owner/operator of the project should be responsible for the decommissioning and rehabilitation and this should be reflected in an agreement with the host landowner(s).</li> </ul>	<ul style="list-style-type: none"> <li>Include rehabilitation objectives requiring the TWA area to be rehabilitated within 12 months of the commencement of operations and the remaining site to be</li> </ul>

Issue	Recommended conditions
<ul style="list-style-type: none"> <li>With the implementation of objective-based conditions and monitoring requirements, which are consistent with these key principles, the Department considers that the TWA and solar farm would be suitably decommissioned at the end of the project life. The TWA is required to be decommissioned within 12 months of the commencement of operations, and the remaining site is to be decommissioned within 18 months after the cessation of operations, and the site would be appropriately rehabilitated.</li> </ul>	rehabilitated within 18 months of cessation of operations.

## 6 Evaluation

108. The Department has assessed the development application, EIS, Submissions Report and additional information and has carefully considered:
  - submissions received from members of the community;
  - comments provided by NSC and DRC; and
  - advice received from State and local Government agencies.
109. The Department has considered the objectives of the EP&A Act, including ESD principles, and relevant considerations under section 4.15(1) of the EP&A Act. The Department has given consideration to Edify's evaluation of the project's merits against applicable statutory and strategic planning requirements.
110. The project is a permissible land use with consent under the provisions of the Transport and Infrastructure SEPP and is located on agricultural land, most of which has been historically used for cropping.
111. The project has been designed to avoid site constraints, including most heritage and native vegetation, while maintaining its ability to utilise the existing electricity infrastructure and road network. This is consistent with the Solar Guideline's focus on avoiding or minimising impacts during site selection and design.
112. The project would not result in any significant reduction in overall agricultural productivity of the region. Following decommissioning, the site could be returned to agricultural land and restored to its original productivity potential. The Department considers there would be no significant visual impacts on surrounding residences, due to distance from non-associated residences and intervening topography and vegetation.
113. To address the residual impacts including land compatibility, traffic and hazards, the Department has recommended a range of stringent conditions, developed in consultation with agencies and Councils, to ensure these impacts are effectively minimised, managed or offset.
114. The Department considered the submissions made through the exhibition of the project and the issues raised by the community and agencies during consultation. These matters have been addressed through changes to the project and the recommended conditions of consent.
115. Importantly, the project would assist in transitioning the electricity sector from coal and gas-fired power stations to low emissions sources and is consistent with the goals of the NSW's Climate Change Policy Framework and the Net Zero Plan Stage 1: 2020 – 2030. It would have a generating capacity of 100 MW of clean electricity, which is enough to power approximately

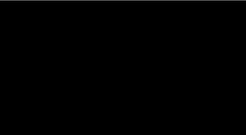
42,441 homes, and 100 MW / 400 MWh of energy storage to dispatch energy to the grid when energy generation from renewable resources is limited.

116. The Department considers that the project achieves an appropriate balance between maximising the efficiency of the solar resource development and minimising the potential impacts on surrounding land users and environment. Through job creation, capital investment and a contribution to NSC in accordance with section 7.11 EP&A Act, the project would also stimulate economic investment in renewable energy and provide flow-on benefits to the local community.
117. Overall, the Department's assessment concludes that the project would result in benefits to the State of NSW and considers the project is in the public interest. As such the Department concludes that the project is approvable subject to conditions (see Appendix F).
118. This assessment report is hereby presented to the Commission to determine the application.

Prepared by:

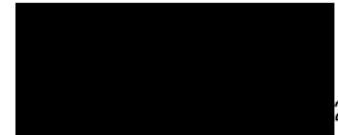
Rita Hatem, Senior Environmental Assessment Officer  
Nestor Tsambos, Team Leader

Recommended by:



22/12/25

Iwan Davies  
Director  
Energy Assessments



22/12/25

Chris Ritchie  
Executive Director  
Energy, Resources and Industry

# Appendices

## Appendix A – Environmental Impact Statement

## Appendix B – Submissions and government agency advice

## Appendix C – Submissions Report

## Appendix D – Additional information

## Appendix E – Amendment Report

## Appendix F – Recommended Development Consent

Appendices A to F available at:

<https://www.planningportal.nsw.gov.au/major-projects/projects/burroway-solar-farm.>

## Appendix G – Consideration of community views

The Department exhibited the EIS for the project from 11 October 2024 and 7 November 2024 and received 83 unique submissions from the public (five from special interest groups), of which 81 objected to the project.

The Department consulted with government agencies, Narromine Shire Council (NSC) and Dubbo Regional Council (DRC) throughout the assessment process.

The key issues raised by the community (including in public submissions) and considered in the Department's Assessment Report include energy transition, land use compatibility and traffic and transport impacts of project.

Other issues are addressed in detail in the Department's Assessment Report.

**Table 8 | Consideration of community views**

Issue	Consideration
<b>Energy Transition</b> <ul style="list-style-type: none"><li>Impacts of renewable energy development</li></ul>	<b>Assessment</b> <ul style="list-style-type: none"><li>Community submissions raised concerns regarding the impacts of renewable energy development and their location.</li><li>The project aligns with national and state policies by diversifying energy generation, reducing carbon emissions, and enhancing energy security, with a solar capacity of</li></ul>

Issue	Consideration
<ul style="list-style-type: none"> <li>Location of renewable energy projects</li> </ul>	<p>100 MW, the project would generate enough electricity to power about 42,441 homes. This is consistent with the NSW Climate Change Policy Framework of achieving net zero emissions by 2050.</p> <ul style="list-style-type: none"> <li>The site is also located in the Central West and Orana REZ, which was declared due to its abundant solar resources and direct access to the electricity grid at a location with available network capacity. Therefore, the project is consistent with the Central West and Orana Regional Plan.</li> <li>The inclusion of a battery (100 MW / 400 MWh) would enable the project to store energy for dispatch to the grid outside of daylight hours and/or during peak demand, increasing grid stability and energy security.</li> <li>The project is located in the CWO REZ, which is a declared REZ. The project would contribute to the continued growth of renewable energy generation and storage capacity in the REZ, with direct access to the transmission network and abundant solar resources.</li> <li>As such, the project would play an important role in increasing renewable energy generation and capacity and contributing to the transition to a cleaner energy system as coal fired generators retire.</li> </ul>
<b>Compatibility of the proposed land use</b> <ul style="list-style-type: none"> <li>Impact on and loss of agricultural land</li> <li>Site suitability</li> </ul>	<p><u>Assessment</u></p> <ul style="list-style-type: none"> <li>Thirty-seven submissions received during the EIS exhibition period raised concerns about establishing a solar farm on agricultural land. Five submissions raised concerns regarding the suitability of the site for the project.</li> <li>The project has been designed to avoid higher quality agricultural land, with the siting of the permanent infrastructure being located on land ground-truthed as Class 6 under the Land and Soil Capability Mapping for NSW (OEH 2017).</li> <li>The combined development footprint with the other proposed, approved and/or operational SSD solar farms in the Central West and Orana region (16,853 ha) would be approximately 17,249 ha. The loss of 17,249 ha of agricultural land represents a tiny proportion (0.19%) of the 8.9 million ha of land currently used for agricultural output in the CWO region. It would result in a negligible reduction in the overall productivity of the region.</li> <li>The site is intended to continue to be used for grazing purposes during operation and is to be returned to agricultural use following decommissioning. Accordingly, the Department is satisfied that the project would not result in any significant reduction in agricultural productivity of the region or of local agribusiness.</li> </ul>

Issue	Consideration
	<ul style="list-style-type: none"> <li>• Agricultural operations of adjoining landholders would not be impacted as erosion and sediment risks can be managed effectively by implementing a control plan, water pollution is not permitted, and noise and dust would not be significant.</li> <li>• The site is located on land zoned RU1 Primary Production and SP2 Infrastructure under the Narromine LEP. As such, the project is permissible with consent through the Transport and Infrastructure SEPP.</li> <li>• The site is located in the Central West and Orana REZ, which was declared due to its abundant solar resources and direct access to the electricity grid at a location with available network capacity.</li> <li>• The project is consistent with the Central West and Orana Regional Plan.</li> <li>• On this basis, and noting DPI Agriculture's comments on the project, the Department considers the project would not fragment or alienate any resource lands in the LGA, the land is suitable for the project and is capable of being returned to agricultural use following decommissioning.</li> </ul> <p><u>Recommended conditions</u></p> <ul style="list-style-type: none"> <li>• Maintain agricultural land capability.</li> <li>• Maintain the groundcover of the site following construction or upgrading, maintain the groundcover with appropriate perennial species and manage weeds within the groundcover.</li> <li>• Minimise any soil erosion associated with the construction, upgrading or decommissioning of the development.</li> <li>• Ensure that noise associated with the construction, operation, upgrading and decommissioning of the project complies with the relevant noise criteria.</li> <li>• Minimise dust generated by the development.</li> </ul>
<b>Accommodation</b>	<p><u>Assessment</u></p> <ul style="list-style-type: none"> <li>• Up to 250 workers would be required during the peak construction period (about six months). Edify originally proposed the use of local accommodation within Narromine and Dubbo to accommodate the project's workforce, however, DRC raised concerns and noted there is limited available accommodation within their region.</li> <li>• In response to DRC's concerns, Edify amended the project to include a temporary workers accommodation camp (TWA) to house 250 workers (at peak).</li> <li>• Edify has demonstrated the following means of servicing the TWA in relation to water, sewerage, waste, electricity and medical services:</li> </ul>

Issue	Consideration
	<ul style="list-style-type: none"> <li>– NCS confirmed water could be sourced through the use of NSC standpipes;</li> <li>– Edify would either provide an on-site sewage treatment plant, or collect and dispose of sewage to the Dubbo Sewage Treatment Plant;</li> <li>– NSC confirmed the Trangie Waste Facility can take the project's waste;</li> <li>– on-site diesel generators would provide electricity;</li> <li>– the TWA would include a medical room, a general practitioner would be made available on site every fortnight or as required. NSW Health have also recommended a nurse be present on site everyday, with at least telehealth access to a GP. The Department has recommended a condition of consent to ensure Edify provide appropriate access to an onsite prescribing nurse and GP, in consultation with NSW Health.</li> <li>– security personnel would be present on site at all times.</li> </ul> <ul style="list-style-type: none"> <li>• The Department is satisfied that the proposed TWA facility is capable of being effectively serviced and would address key concerns raised by DRC by mitigating the project's reliance on local accommodation providers.</li> </ul>
	<p><b><u>Recommended conditions</u></b></p> <ul style="list-style-type: none"> <li>• Prepare an Accommodation and Employment Strategy (AES) and an Accommodation Camp Management Plan prior to commencing construction in consultation with NSC and DRC.</li> <li>• Ensure utilities at the TWA facility, including water, wastewater, waste and electricity, are designed and located in accordance with NRC's specifications.</li> </ul>
<b>Biodiversity</b>	<b><u>Assessment</u></b>
<ul style="list-style-type: none"> <li>• Impacts on flora and fauna</li> </ul>	<ul style="list-style-type: none"> <li>• Thirty-seven public submissions raised concerns regarding potential biodiversity impacts associated with the project.</li> <li>• The project site predominantly comprises areas currently utilised for agricultural activities and also supports patches of remnant vegetation.</li> <li>• Edify designed the project to avoid and minimise impacts on high quality vegetation and habitat, creating clear exclusion zones and avoiding remnant vegetation on site.</li> <li>• The project would have a limited impact to the site's biodiversity, clearing 0.11 ha of vegetation and generating a total of 16 ecosystem credits under the BC Act which would be retired through the NSW Biodiversity Offset Scheme.</li> <li>• Public submissions raised specific concerns regarding potential impacts to the Silver Leaf Mountain Gum, Latham's Snipe and the Eastern Curlew. Within their BDAR, Edify assessed and identified all potential flora and fauna species that do or</li> </ul>

Issue	Consideration
	<p>could potentially occur on site. Silver Leaf Mountain Gum, Eastern Curlew and Latham's Snipe were not found on the site.</p> <ul style="list-style-type: none"> <li>Overall, the Department considers that the project is unlikely to result in a significant impact on biodiversity values.</li> </ul> <p><b><u>Recommended conditions</u></b></p> <ul style="list-style-type: none"> <li>Edify must not clear any native vegetation or fauna habitat located outside the approved disturbance areas.</li> <li>Retire the applicable biodiversity offset credits in accordance with the NSW Biodiversity Offsets Scheme.</li> <li>Prepare and implement a Biodiversity Management Plan in consultation with CPHR, including measures to protect and manage vegetation and fauna habitat outside the approved disturbance area.</li> </ul>
<b>Visual</b> <ul style="list-style-type: none"> <li>Impacts on landscape and rural character</li> <li>Visual amenity</li> </ul>	<p><b><u>Assessment</u></b></p> <ul style="list-style-type: none"> <li>Fifteen public submissions raised concerns regarding the visual amenity impacts of the project.</li> <li>There are four non-associated receivers within 2 km of the site. The closest receiver (R1) is approximately 1.8 km away. The visual impact assessment prepared for the project indicated the visual impact on all four residential receivers would be negligible due to distance, topography and intervening vegetation. The project would also not result in glint and glare impacts to residences.</li> <li>The site is located within 200 km of the Dark Sky region from the Siding Spring Observatory, as such, Edify has committed to not utilising any permanent night lighting within the solar farm, unless needed for the TWA, maintenance or in the event of an emergency.</li> <li>The Department considers the visual impacts associated with the project are negligible and can be appropriately mitigated with the management measures and recommended conditions of consent.</li> </ul> <p><b><u>Recommended conditions</u></b></p> <ul style="list-style-type: none"> <li>Minimise off-site visual impacts of the development.</li> <li>Ensure the visual appearance of ancillary infrastructure blends in as much as possible with the surrounding landscape.</li> <li>Minimise off-site lighting impacts of the development.</li> </ul>
<b>Hazards</b>	<p><b><u>Assessment</u></b></p>

Issue	Consideration
<ul style="list-style-type: none"> <li>• Risk of bushfire</li> <li>• Risk of contamination</li> </ul>	<ul style="list-style-type: none"> <li>• Forty-one public submissions raised concerns about fire hazards/contamination combined.</li> </ul> <p><u>Bushfire</u></p> <ul style="list-style-type: none"> <li>• The site is located on bushfire prone land, as such Edify prepared a Bushfire Strategic Study and would be required to comply with the RFS's <i>Planning for Bushfire Protection 2019</i>.</li> <li>• The Bushfire Strategic Study identified that parts of the site are located within the Category 2 land, with no Category 1 land.</li> <li>• The Department considers that the bushfire risks can be suitably controlled through the implementation of standard fire management procedures and recommendations made by FRNSW and RFS.</li> </ul> <p><u>Contamination</u></p> <ul style="list-style-type: none"> <li>• Community submissions raised concerns regarding contamination of the subject site. Edify prepared a Preliminary Site Investigation (PSI) report that was prepared in consideration of <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>.</li> <li>• The PSI report found no records of significant potentially contaminating activities or commercial/industrial activities on site and concluded that the land is unlikely to contain significant contamination.</li> <li>• Regarding the possible contamination of the site from the solar farm itself, the Department's Frequently Asked Questions – Large Scale Solar Guideline document outlines that the use of metals in solar panels has not been found to pose a risk to the environment as they are enclosed in thin layers between sheets of glass or plastic within the solar panel. To readily release contaminants into the environment, solar panels would need to be ground to a fine dust. As such, contamination of soil resulting from the proposal is not expected.</li> <li>• The Department considers the project site is suitable for development subject, and contamination risks from the project are minimal and can be appropriately managed.</li> </ul> <p><u>Recommended Conditions</u></p> <ul style="list-style-type: none"> <li>• The BESS must not exceed the proposed total energy storage capacity of 400 MWh across the project site and must be installed in an arrangement consistent with the EIS.</li> <li>• The decentralised BESS must not exceed 20 MWh of energy storage collocated.</li> <li>• A Fire Safety Study and Emergency Plan be prepared for the development.</li> </ul>

Issue	Consideration
	<ul style="list-style-type: none"> <li>• Ensure the project complies with the relevant asset protection requirements in the NSW RFS's <i>Planning for Bushfire Protection 2019</i> and Standards for APZs.</li> <li>• All chemicals, fuels and oils to be stored in accordance with Australian Standards and EPA requirements.</li> </ul>
<b>Waste</b>	<p><u>Assessment</u></p> <ul style="list-style-type: none"> <li>• Sixteen submissions also raised concerns regarding the project waste management.</li> <li>• Edify has identified waste treatment facilities capable of accepting most waste streams to be produced by the development within the Narromine Shire LGA. Edify contacted NSC who confirmed the Trangie Waste Facility is able to receive construction and general waste types generated by the project and temporary workers facility. Council raised no further concerns regarding waste in its comments on the Submissions Report.</li> <li>• Edify have also identified the Dubbo Sewerage Treatment Facility to service the wastewater volumes that would be generated by the TWA.</li> <li>• Edify has committed to preparing and implementing a Waste Management Plan (WMP) in consultation with NSC and DRC.</li> <li>• The Department considers that project-related waste can be effectively managed with the implementation of the proposed mitigation measures.</li> </ul> <p><u>Recommended conditions</u></p> <ul style="list-style-type: none"> <li>• Prepare and implement a waste management plan, including a wastewater management plan, prior to commencing construction in consultation with NSC and DRC.</li> <li>• Minimise the waste generated by the development.</li> <li>• Classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (or its latest version).</li> <li>• Store and handle all waste on site in accordance with its classification.</li> <li>• Remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.</li> </ul>

## Appendix H – Statutory considerations

### Objects of the EP&A Act

In line with the requirements of section 4.15 of the EP&A Act, the Department's assessments of the project has given detailed consideration to a number of statutory requirements. These include:

- the objects found in section 1.3 of the EP&A Act; and
- the matters listed under section 4.14(1) of the EP&A Act, including applicable environmental planning instruments and regulations; and

The Department has considered all these matters in its assessment of the project and has provided a summary of this assessment in Table 9 below.

**Table 9 | Objects of the EP&A Act and how they have been considered**

Summary
Objects of the EP&A Act

The objects of most relevance to the Consent Authority's decision on whether to approve the project are found in section 1.3(a), (b), (c), (e) and (f) of the EP&A Act.

The Department considers the project encourages the proper development of natural resources (Object 1.3(a)) and the promotion of orderly and economic use of land (Object 1.3(c)), particularly as the project:

- is a permissible land use on the subject land;
- is located in a logical location for efficient solar energy development;
- is able to be managed such that the impacts of the project could be adequately minimised, managed, or at least compensated for, to an acceptable standard;
- would contribute to a more diverse local industry, thereby supporting the local economy and community;
- would not fragment or alienate resource lands in the LGA; and
- is consistent with the goals of NSW's *Climate Change Policy Framework and Net Zero Plan Stage 1: 2020 – 2030 and Implementation update* (2022) and would assist in meeting Australia's renewable energy targets whilst reducing greenhouse gas emissions.

The Department has considered the encouragement of Ecologically Sustainable Development (ESD) (Object 1.3 (b)) in its assessment of the project. This assessment integrates all significant socio-economic and environmental considerations.

In addition, the Department considers that appropriately designed SSD solar farm development, in itself, is consistent with many of the principles of ESD. Edify has also considered the project against the principles of ESD. Following its consideration, the Department considers that the project can be carried out in a manner that is consistent with the principles of ESD.

Consideration of environmental protection (Object 1.3(e)) is provided in **Section 5** of this report. Following its consideration, the Department considers that the project could be undertaken in a manner that would at

## Summary

least maintain the biodiversity values of the locality over the medium to long term and would not significantly impact threatened species and ecological communities of the locality. The Department is also satisfied that any residual biodiversity impacts could be managed and/or mitigated by imposing appropriate conditions and retiring the required biodiversity offset credits.

Consideration of the sustainable management of built and cultural heritage (Object 1.3(f)) is also provided in **Section 5.5** of this report. Following its consideration, the Department considers the project would not significantly impact the built or cultural heritage of the locality, and any residual impacts can be managed and/or mitigated by imposing appropriate conditions.

## State significant development

Under section 4.36 of the EP&A Act the project is considered a State Significant Development.

Under section 4.5(a) of the EP&A Act and clause 1(b) of section 2.7 of the Planning Systems SEPP, the Independent Planning Commission is the consent authority for the development as the project received more than 50 unique public submissions by way of objection.

## Environmental Planning Instruments (EPIs)

The *Narromine Local Environmental Plan 2011* (LEP) applies to the extent of determining the permissibility of the project. The project is located in RU1 and SP2 land use zone under the LEP and is permissible with consent under the provisions of the Transport and Infrastructure SEPP, as discussed in **Section 3.2**.

In accordance with the Transport and Infrastructure SEPP, the Department has given written notice of the project to Essential Energy (s2.48) and TfNSW. The Department has considered the advice received and, where appropriate, developed conditions of consent to address recommendations and advice of these authorities.

Edify completed a preliminary risk screening in accordance with *State Environmental Planning Policy No 33 – Hazardous and Offensive Development* and confirmed the project was not categorised as potentially hazardous or potentially offensive development. A preliminary hazard analysis (PHA) prepared for the project concluded the risk profile of the project was tolerable and that there was negligible risk of off-site consequences associated with the project. Edify has committed to implementing all controls recommended by the PHA. Accordingly, the Department is satisfied that the project is not potentially hazardous or potentially offensive development and does not pose an unacceptable risk to community or environment.

The Department has also considered the provisions of Resilience and Hazards SEPP (Chapter 4). The site is not listed as a contaminated site in the NSW EPA Contaminated Land Record and list of NSW contaminated sites. Given the site has historically been used for agricultural uses, the Department considers the site would be suitable for the project.