

Homebush Battery Energy Storage System

State Significant Development Assessment Report (SSD-77443244)

July 2026





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 Homebush Battery Energy Storage System located at 10 Homebush Bay Drive, Homebush, in the Strathfield local government area, lodged by Ausgrid. The report includes:

- an explanation of why the project is considered 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 which weighs up the likely impacts and benefits of the project, having regard to the proposed mitigations, offsets, community views and expert advice; and provides a view on whether the impacts are on balance, acceptable
- an opinion on whether the project is approvable or not, along with the reasons, to assist the Independent Planning Commission in making an informed decision about whether development consent for the project can be granted and any conditions that should be imposed.

Executive Summary

Ausgrid proposes to develop the Homebush Battery Energy Storage System (BESS) (the project), a 200 megawatt (MW) / 431 megawatt-hour (MWh) battery and associated infrastructure, approximately 13 kilometres (km) west of Sydney's Central Business District (CBD), in the Strathfield local government area (LGA).

The project is optimally located within the Sydney Metropolitan Region where electricity demand is heavily concentrated. The project has direct transport links to the State road network to facilitate construction and is immediately adjacent the existing Mason Park Sub-transmission switching station (STSS). The project's location within Sydney's metropolitan load centre would enable the efficient storage and dispatch of energy to the grid during periods of peak demand.

The project is situated within Ausgrid's Mason Park STSS site on vacant, previously disturbed land immediately east of the existing 132 kilovolt (kV) substation.

To facilitate connection of the proposed BESS to the substation, Ausgrid has obtained a separate determination to construct a 132 / 33 kV high-voltage transformer and associated infrastructure, which is due to be constructed by early 2027. The proposed BESS would connect to the Mason Park STSS, via a proposed 33 kV underground cable.

Access to the site is via Homebush Bay Drive and the M4 Western Motorway on-ramp, and the WestConnex Fulton Hogan Egis Motorway Control Centre (MCC) Access Road, using two access points off the MCC Access Road.

The site is located on land zoned SP2 Infrastructure (Electricity Supply) under the *Strathfield Local Environmental Plan 2012* (Strathfield LEP). It is currently occupied by the Mason Park STSS and associated electrical infrastructure, a John Holland / CPB Training Academy (which is leased on Ausgrid property), a vehicle parking area and a vacant vegetated area.

The surrounding land use is largely industrial and commercial. The site is bordered to the south by the MCC Access Road and bordered to the north and east by the Direct Factory Outlet (DFO) Homebush and to the west by Mason Park STSS. Medium density residential land is located approximately 150 metres (m) to the south-east of the proposed battery unit location.

The Department exhibited the Environmental Impact Statement for the project between 19 June 2025 and 21 July 2025 and received 63 unique submissions (52 submissions from individuals and 11 submissions from organisations). Of these, 59 submissions objected to the project, 1 submission supported the project and 3 provided comment. Twelve government agencies and Strathfield Council provided advice on the project.

Around 84% of submissions (53 submissions) were received from over 100 km from the site (including submissions made from interstate), 10% (6 submissions) were from residents located regionally (5 – 100 km from the site) and 6% (4 submissions) were received from residents located locally (within 5 km of the site).

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

Ausgrid provided a Submissions Report in October 2025, and additional information addressing the concerns raised by Council, agencies and public submissions. Through the process of providing additional information in response to concerns raised by the Department, Ausgrid made minor revisions to the project layout to allow adequate battery spacing to minimise fire propagation risk, optimise internal vehicle access, reduce operational noise impacts, and improve constructability of the project. Between receipt of the Submissions Report and recommendation, Ausgrid provided responses to the Department requests for further information and clarifications, including clarification of the scope of the HV connection infrastructure project, updating the traffic impact assessment to respond to comments from Transport for NSW, and further detail on proposed landscaping.

The key assessment considerations are energy security, hazards and risk, noise and visual amenity. The Department has also undertaken a comprehensive assessment of the full range of other potential impacts and recommended a range of detailed conditions, developed in consultation with agencies, utility providers and Council, to ensure all potential impacts are effectively minimised, managed or offset.

The project is consistent with the Commonwealth's Renewable Energy Target and NSW's *Climate Change Policy Framework* and the *Net Zero Plan Stage 1: 2020-2030*, given its proximate location to load centres in the Sydney Metropolitan Region and as it would enable the storage of energy for dispatch to the grid during periods of peak demand, which has the potential to increase grid stability and energy security.

The Department consulted closely with Fire and Rescue NSW and Rural Fire Service throughout the assessment process, and considers that fire and hazards risks for the project can be managed, subject to the recommendations of the Preliminary Hazard Assessment (including minimum separation distances between BESS containers and compliance with the relevant standards and test methods) and the preparation of a Fire Safety Study.

The Department considers that construction noise can be effectively managed through mitigation measures, including development and implementation of a construction noise and vibration

management plan, scheduling high noise and vibration generating construction works during less sensitive periods and including respite hours. Operational noise levels would comply with the NSW *Noise Policy for Industry* (EPA, 2017) (NPfI) at all non-associated residential receivers and at the closest commercial premises, and active and passive recreation areas. The project would not result in unacceptable visual amenity impacts subject to mitigation measures and the recommended conditions of consent. Furthermore, the Department considers that the project would not fundamentally change the broader landscape characteristics of the area.

The Department considers the project is a compatible land use in the context of the locality, noting it would be co-located with existing electrical infrastructure and would not detract from the character of the area. The project would store and distribute energy to support reliable supply to NSW.

The project would provide flow-on benefits to the local community, including up to 100 construction jobs and one operational job. There would also be broader benefits to the State through an injection of \$215 million in capital investment into the NSW economy.

The Department considers the project would not result in significant impacts on the local community or the environment, and any residual impacts can be managed through 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 Introduction

1. Ausgrid proposes to develop a new State significant development (SSD) battery energy storage system (BESS) in Homebush, approximately 13 kilometres (km) west of Sydney's Central Business District (CBD), in the Strathfield local government area (LGA) (see **Figure 1**).
2. The project involves the development of a 200 megawatt (MW) / 431 megawatt-hour (MWh) BESS and connection to Ausgrid's 132 kilovolt (kV) Mason Park Sub-transmission switching station (STSS), which is located within the same site as the proposed project.
3. To enable connection of the BESS to the substation, Ausgrid has an approval under Part 5 of the *Environmental Planning & Assessment Act 1979* (EP&A Act) to construct a 132 / 33 kV high-voltage (HV) transformer and associated infrastructure (HV connection infrastructure project), which is due to be constructed by early 2027. This infrastructure would be available for the project to connect into once constructed.
4. Access to the site is proposed via Homebush Bay Drive, the M4 Western Motorway on-ramp, and the WestConnex Fulton Hogan Egis Motorway Control Centre (MCC) Access Road, using two access points off the MCC Access Road – the Northern Access point and the Southern Access point.
5. The Northern Access point would be constructed under the separate Part 5 determination for the HV connection infrastructure project and would be used as the primary site access for heavy vehicles and heavy vehicles requiring escort during construction. The Southern Access point would be constructed as part of the project and its use limited to light vehicles during construction. During operation, vehicles would utilise the Northern Access point, and the Southern Access point would be locked and used only as an emergency access point. No upgrades are required to any roads or intersections to facilitate access to the site.
6. Construction of the project would occur over approximately 22 months. Construction works would be limited to Monday to Friday 7 am to 6 pm, and Saturday 8 am to 1 pm. The project also allows for the upgrading and decommissioning of equipment over time. The expected operational life of the project is up to 50 years, with infrastructure upgrades expected to be required after about 20 years.
7. 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), submissions report, and supporting documentation (see **Appendix A**, **Appendix D** and **Appendix E**).

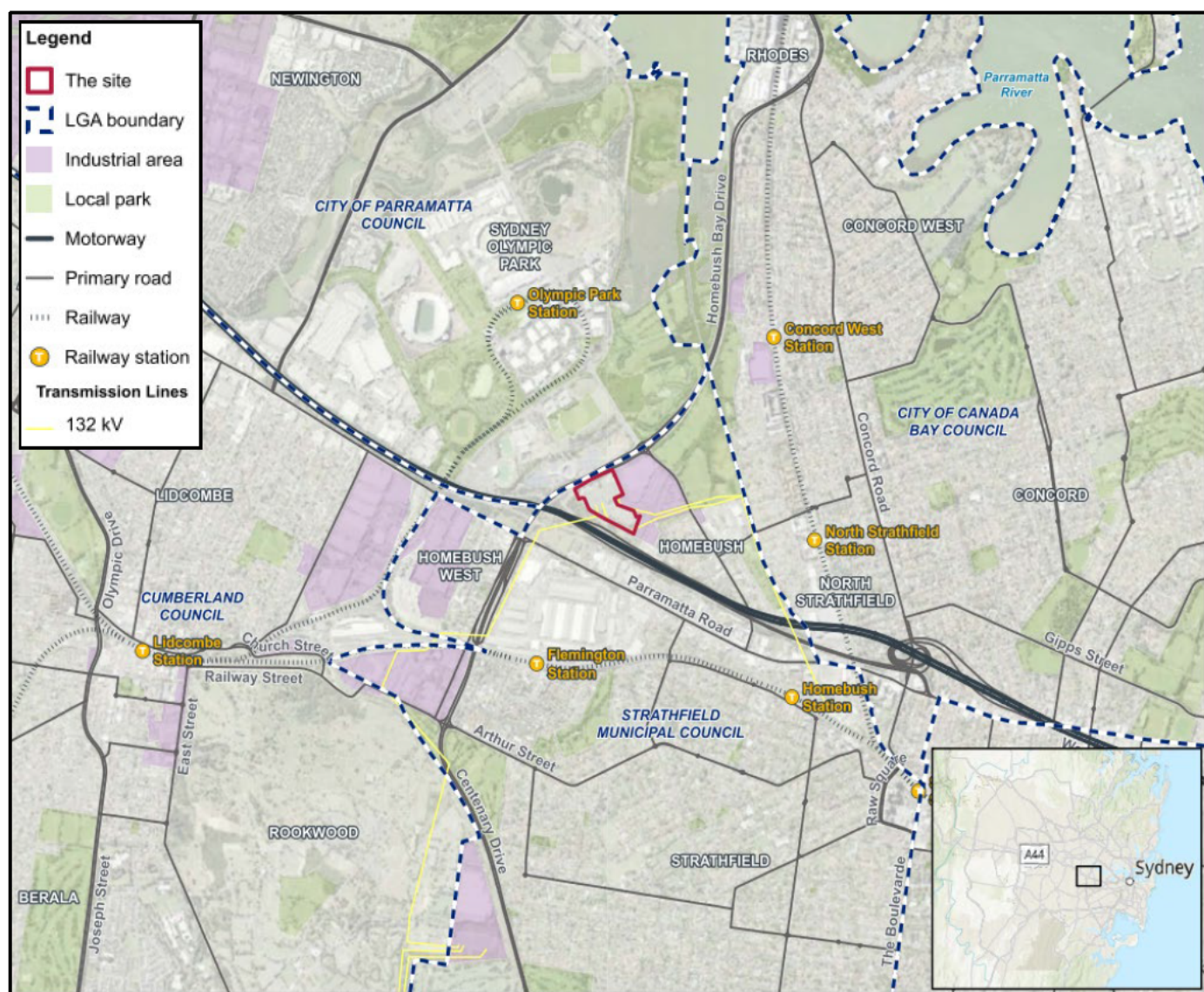


Figure 1 | Regional context map

Table 1 | Main Components of the Project

Aspect	Description
Project summary	The project would include: - a 200 MW / 431 MWh BESS, comprising lithium-ion phosphate batteries, inverters and transformers; - a 33 kV underground cable connection from the containerised battery units to the Mason Park STSS; - ancillary infrastructure including a switch room and control room building, a warehouse, ring main units, an auxiliary transformer and a backup diesel generator; and - other ancillary infrastructure including fire suppression and firewater capture, stormwater management, boundary security chain wire fencing, noise barriers, lighting, and onsite carparking.

Aspect	Description
Project location	10 Homebush Bay Drive, Homebush, NSW 2140 (Lot 1 and Lot 2, DP 1316485)
Site Area	6.2 hectares (ha)
Development footprint	2.95 ha
Access route	Vehicles would travel to site via Homebush Bay Drive, the M4 Western Motorway on-ramp, and the WestConnex Fulton Hogan Egis MCC Access Road.
Site access	The site would be accessed via the Northern Access point (to be constructed as part of the HV connection infrastructure project) and the proposed the Southern Access point, off the MCC Access Road.
Construction	- The construction period would likely commence in 2027 and take approximately 22 months. - Construction hours would be limited to Monday to Friday 7 am to 6 pm, and Saturday 8 am to 1 pm.
Operation	The expected operational life of the project is 50 years, with infrastructure upgrades expected to be required after about 20 years.
Decommissioning and rehabilitation	Following decommissioning, all above ground infrastructure would be removed and the land rehabilitated to pre-development conditions.
Hours of operation	The BESS would operate 24 hours a day, 7 days a week.
Employment	Up to 100 construction jobs and 1 operational job.
Estimated development cost	\$215 million

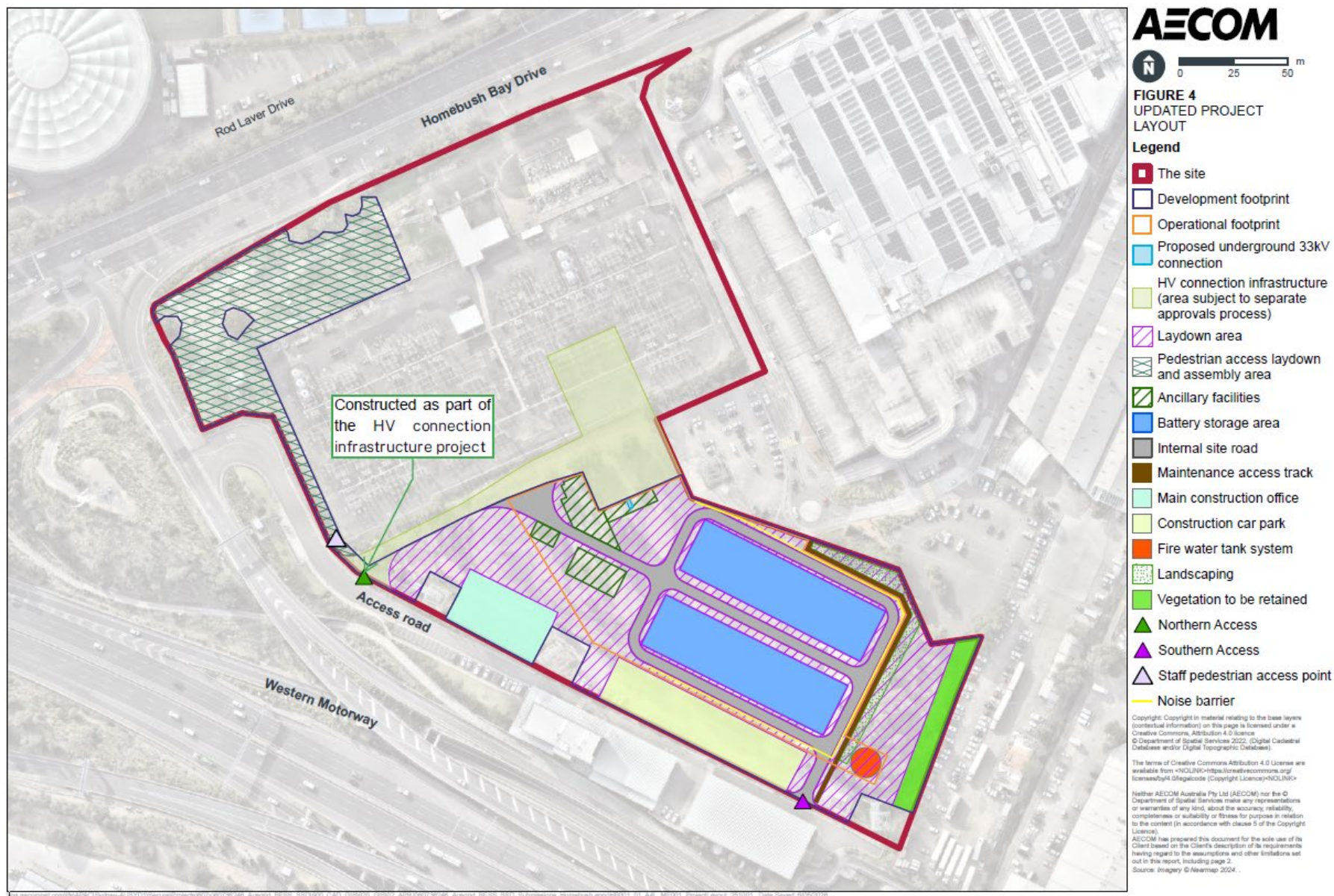


Figure 2 | Project layout

2 Strategic context

2.1 Site and surrounds

8. The project site is approximately 6.2 hectares (ha) and the development footprint covers approximately 2.95 ha. The site is located on land zoned SP2 Infrastructure (Electricity Supply) under the *Strathfield Local Environmental Plan 2012* (Strathfield LEP) and is currently occupied by the Mason Park STSS and associated electrical infrastructure, a John Holland / CPB Training Academy (which is leased on Ausgrid property), a vehicle parking area and a vacant parcel of land with regrowth vegetation on hardstand.
9. The surrounding land use is largely industrial and commercial. The site is bordered to the west by Homebush Bay drive, to the south by the MCC Access Road, to the north by the Direct Factory Outlet (DFO) Homebush and to the east by a carparking area for nearby warehouses. The M4 Western Motorway is located further to the south, with Homebush Bay Drive to the north. The nearest recreational and conservation land includes Wentworth Reserve (located approximately 150 metres (m) east), Lake Belvedere (located approximately 370 m north) and the Mason Park Wetlands (located approximately 550 m north-east).
10. The nearest non-associated residential receivers are located approximately 150 m to the south-east of the proposed battery unit location, within two-storey medium density apartments. Kinda-Mindi Early Learning childcare is located approximately 300 m south of the site.

2.2 Other energy projects

11. There are six State significant renewable energy projects within the Sydney Metropolitan Region (see **Table 2**), of which one development application was approved prior to Ausgrid's lodgement of the EIS.
12. As per the Department's *Cumulative Impact Assessment Guidelines for State Significant Projects 2021*, Ausgrid and the Department's assessments of cumulative impacts has considered the relevant future projects to be those that have been exhibited, are currently under assessment, have been referred to the IPC, or approved.
13. Cumulative impacts from renewable energy projects in the Sydney Metropolitan Region are not anticipated, as the projects would commence construction at different times or are spatially separated by established metropolitan suburbs and associated urban infrastructure.

Table 2 | Nearby SSD Renewable Energy Projects

Project	Storage Capacity (MW)	Status	Approximate distance from the project (km)
Smithfield Battery Energy Storage System	72 MW / 260 MWh	Approved	11 km west
Penrith HV Battery Energy Storage System	100 MW / 200 MWh	Proposed - Under assessment	37 km west

Project	Storage Capacity (MW)	Status	Approximate distance from the project (km)
Baulkham Hills Battery Energy Storage System	100 MW / 200 MWh	Proposed	12 km north-west
Guildford West Battery Energy Storage System	100 MW / 200 MWh	Proposed	10 km west
Kurnell Energy and Industry Precinct	800 MW / 3,800 MWh	Proposed	22 km north-west
Kamay Battery Energy Storage System	100 MW / 200 MWh	Proposed	21 km north-east

2.3 Energy context

14. The project aligns with the current strategic direction of the NSW Government which supports investment in transmission, generation, storage, and firming infrastructure to ensure secure and reliable energy in NSW. The dispatchable electricity from the project would assist with improving the stability and reliability of the electrical grid within the Greater Sydney region and reducing greenhouse gas emissions.
15. As NSW transitions away from coal fired power, there is an increasing need for battery storage to firm renewable energy sources. The *NSW Electrical Strategy (2019)* notes that all coal fired power plants in NSW are scheduled for closure within the next twenty years and that firmed renewables are the lowest cost option to replace aging coal power stations. The Australian Energy Market Operator's (AEMO) *2024 Integrated System Plan (ISP)* states that battery storage is required to provide firming capacity and to support intra-day energy shifting.
16. With a capacity of 200 MW / 431 MWh, the BESS would increase grid stability and energy security. Accordingly, the project aligns with several national and State policies, including *Australia's Long Term Emissions Reduction Plan* and the *NSW Net Zero Plan Stage 1: 2020-2030* and associated Implementation Update. These policies identify the need to diversify the energy generation mix and reduce the carbon emissions intensity of the grid while providing energy security and reliability.

3 Statutory context

3.1 State Significant Development

17. The project is classified as SSD under Section 4.36 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). This is because it triggers the criteria in section 20 of Schedule 1 of the *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.
18. 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 has received more than 50 unique public submissions by way of objection.

3.2 Permissibility

19. The site is located on land zoned as 'SP2 Infrastructure (Electricity Supply)' under the Strathfield LEP.
20. Electricity generating works are permissible with consent on any land in a prescribed non-residential zone, including the SP2 Infrastructure zone, under clause 2.36 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP). Consequently, the project is permissible with development consent.

3.3 Integrated and other approvals

3.3.1 EP&A Act Part 4

21. 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, but must be substantially consistent with any development consent for the project (e.g. approvals for any works under *the Roads Act 1993*).
22. The Department has consulted with the relevant agencies responsible for the integrated and other approvals, considered their advice in its assessment, and included suitable conditions in the recommended conditions of consent to address these matters (see **Appendix C** and **Appendix F**).

3.3.2 EP&A Act Part 5

23. Ausgrid has a determination for the construction and operation of the HV connection infrastructure project, which would facilitate connection of the project to the existing Mason Park STSS. The determination considers the construction of a 132 / 33 kV transformer and associated infrastructure and the Northern Access point and internal access roads.

Construction of these works are due to commence in mid-2026 and be completed by early 2027, with a maximum duration of 6 months. Ausgrid has confirmed that the commencement of construction for Homebush BESS would occur in 2027, and would only commence once the HV connection infrastructure project works are complete. Ausgrid has included a commitment within the mitigation measures for the project that works for the HV connection infrastructure project would not be constructed concurrently with the project. Once constructed, the HV connection infrastructure project would be available for the project to connect into.

3.3.3 EPBC Act

24. Ausgrid considers that the project does not need approval from the Commonwealth Minister for the Environment under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) as assessments undertaken to date have not identified any significant impacts on matters of national environmental significance listed under the EPBC Act.

3.4 Mandatory matters for consideration

3.4.1 Matters of consideration required by the EP&A Act

25. Section 4.15 of the EP&A Act outlines the matters that 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 Ausgrid's consideration of environmental planning instruments in its EIS (see **Section 5**). The Department has also considered relevant provisions of the environmental planning instruments in **Appendix H**.
26. In determining the application, the IPC should consider whether the project is consistent with the relevant objects of the EP&A Act (s 1.3) including the principles of ecologically sustainable development. Consideration of those factors is described in **Appendix H**.
27. As a result of the analyses in **Appendix H**, the Department is satisfied that the development is consistent with the objectives of the EP&A Act and the principles of ecologically sustainable development (ESD).

3.4.2 Biodiversity development assessment report

28. 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*).
29. The EIS included a BDAR (see **Appendix A**). The BDAR and the overall impact of the project on biodiversity values is assessed in **Section 5**.

3.4.3 Draft Development Consent

30. The Department has included discretion in a small number of the draft conditions as a mechanism for an applicant to seek approval from the Secretary for minor matters that do not warrant a modification application. Such matters include, vehicle numbers, timing of management plans, and improvements to battery technology that have no additional environmental impact.
31. This discretion is subject to the same level of scrutiny and assessment as any modification, against applicable legislation, policies and guidelines. Importantly, consultation is undertaken with all stakeholders relevant to any particular request, including councils, agencies, roads authorities and the public.
32. NSW has an urgent need for renewable energy generation and technologies are rapidly advancing. Some detailed design factors are only known upon financial close or execution of contracts with contractors, which occurs post development approval.
33. This discretion is a crucial tool in providing an avenue to achieve outcomes and resolutions for progressed projects that are working towards, or are under, construction.
34. In summary, the Department provides Planning Secretary's Discretion provisions:
 - to account for updated technology at the time of construction from the time of approval, allowing applicants to adopt technologies which would not result in additional impacts; and
 - to account for changes required when an applicant receives financial investment and can appoint contractors. The appointment of these contractors often necessitates some project refinements as project details are finalised; and
 - to provide scope for applicants where changes would not be sufficient to warrant a modification.
35. Significantly, discretion is only ever granted following the Department's assessment of the request, which is undertaken in consultation with relevant stakeholders.

4 Engagement

4.1 Department’s engagement

- 36. The Department publicly exhibited the EIS from 19 June 2025 until 21 July 2025 and notified neighbouring landowners. The Department consulted with Council and relevant government agencies throughout the assessment and inspected the site in December 2025 to assess the potential visual impacts of the project and to understand the matters raised in submissions in more detail.
- 37. The Department also notified and sought comment from Ausgrid and Transport for NSW in accordance with the Transport and Infrastructure SEPP, as discussed in **Section 4.1.1**.

4.1.1 Response to submissions

- 38. Following the public exhibition period, the Department asked Ausgrid to respond to the issues raised in submissions and the advice received from government agencies. Ausgrid provided a submissions report to the Department in October 2025 (see **Appendix D**) and provided additional information during the Department’s assessment (see **Appendix E**).
- 39. The Department published the submissions report on the NSW Planning Portal and forwarded the submissions report to relevant government agencies and Council for comment. Between receipt of the Submissions Report and recommendation, Ausgrid provided responses to the Department requests for further information and clarifications, including clarification of the scope of Part 5 works, updating the traffic impact assessment to respond to comments from Transport for NSW, and further detail on proposed landscaping.

4.2 Summary of advice received from government agencies

- 40. During exhibition of the EIS, the Department received advice from 12 government agencies. A summary of the advice is provided in **Table 3**. A link to the full copies of the advice is provided in **Appendix C**.

Table 3 | Summary of agency advice

Agency	Advice Summary
Conservation Programs, Heritage and Regulation Group (CPHR) within NSW DCCEW	Requested further information on flooding and clarification on the vegetation clearing that occurred on the project site between April and June 2024. Ausgrid revised the Water Impact Assessment as part of the response to submissions. On review, CPHR confirmed all matters relating to flooding raised during exhibition of the EIS were adequately addressed. In the advice on the Submission Report, CPHR requested the Biodiversity Development Assessment Report (BDAR) be updated to assess the additional

Agency	Advice Summary
	project features in Table 2 of the Submissions Report. Ausgrid clarified that these features were simply renamed ancillary infrastructure already assessed in the original BDAR. CPHR accepted Ausgrid's clarification, and confirmed there were no outstanding matters.
Heritage NSW (HNSW) Group within NSW DCCEEW	Requested updates to the Aboriginal Cultural Heritage Assessment Report (ACHAR) to include an extensive Aboriginal Heritage Information Management System (AHIMS) search and to use those results to inform predictive modelling. Requested an update to Appendix C of the ACHAR to demonstrate that all Aboriginal stakeholders identified by statutory agencies were invited to register for consultation, and an update to Appendix D of the ACHAR to demonstrate that the project methodology was sent to Aragung Aboriginal Cultural Heritage Site Assessments and Ginniderra Aboriginal Corporation. Ausgrid addressed the above matters as a part of the Submissions Report. HNSW confirmed all matters raised during the exhibition of the EIS were adequately addressed.
Transport for NSW (TfNSW)	Recommended conditions of consent, including requirements for access from the classified road network, preparation of a Plan of Management (PoM) and Construction Pedestrian and Traffic Management Plan (CPTMP) and obtaining a Road Occupancy Licence (ROL) for construction impacts on traffic flows from the M4 Western Motorway on-ramp. In response to the proposed changes to internal construction vehicle movements in the Submissions Report, TfNSW raised concerns about road safety risk to the transport network. Ausgrid addressed the concerns through provision of an updated Traffic Impact Assessment (TIA) and draft Construction Traffic Management Plan (CTMP). TfNSW confirmed that the issues raised were resolved, subject to its recommended conditions.

41. Fire and Rescue NSW, Rural Fire Service, Water Group within NSW DCCEEW, Crown Lands, DPIRD – NSW Resources, Ausgrid, Sydney Water, Sydney Olympic Park Authority and the NSW EPA did not raise any recommendations or concerns with the project.

4.2.1 Summary of Council's submission

42. Strathfield Council provided comments on the project. A summary of the issues raised by Council is provided in **Table 4** below and a link to the submissions in full is provided in **Appendix C**.

Table 4 | Summary of issues raised by Council

Council	Submission summary
Strathfield Council	Requested further detail regarding visual amenity impacts and the loss of vegetation and canopy cover as a result of the development and commented on traffic, stormwater detention, contamination and noise impacts. On review of the Submissions Report prepared by Ausgrid, Council confirmed that most of matters raised above had been addressed. Council requested further refinement to reduce visual amenity impacts in relation to the noise walls and the use of canopy tree plantings, and that a detailed landscape plan (including a comprehensive planting schedule) be prepared in consultation with Council prior to commencement of operation. Requested monetary contributions under its Indirect Development Contributions Plan equivalent to 1% of the estimated cost of the development. The Department responded to Council's request noting that, as the project would not generate ongoing demand for transport, social or community infrastructure managed by Council, the Department considers that applying a Section 7.11 or 7.12 levy under the EP&A Act is not justified.

4.3 Summary of public submissions

43. The Department received 63 unique submissions during the public exhibition period of the EIS (52 submissions from individuals and 11 submissions from organisations). There were 59 submissions that objected to the project, one submission supported the project and three provided comment. Further detail is provided in **Table 5**, below, **Appendix G** and a link to all submissions in full is provided in **Appendix B**.

Table 5 | Breakdown of public submissions

Submitter distance to development footprint	Objection	Support	Comment	Total
< 5km	1	1	2	4
5-25km	4	0	1	5
25-100km	1	0	0	1
> 100km	34	0	0	34
Interstate	19	0	0	19
TOTAL	59	1	3	63

44. Around 84% of submissions were received from over 100 kms from the site (including submissions made from interstate), 10% were from residents located regionally (5 – 100 km from the site) and 6% were received from residents located locally (within 5 km of the site). Local submissions typically focused on impacts and matters related to the local community, where

submitters located at greater distances from the site raised broader concerns including the justification for renewable energy developments and concerns with State and national policies.

45. The key issues raised by the public relate to hazards, fire risk, renewable energy scepticism and fumes / toxic gas. The key issues raised in public submissions are shown in **Figure 3**.

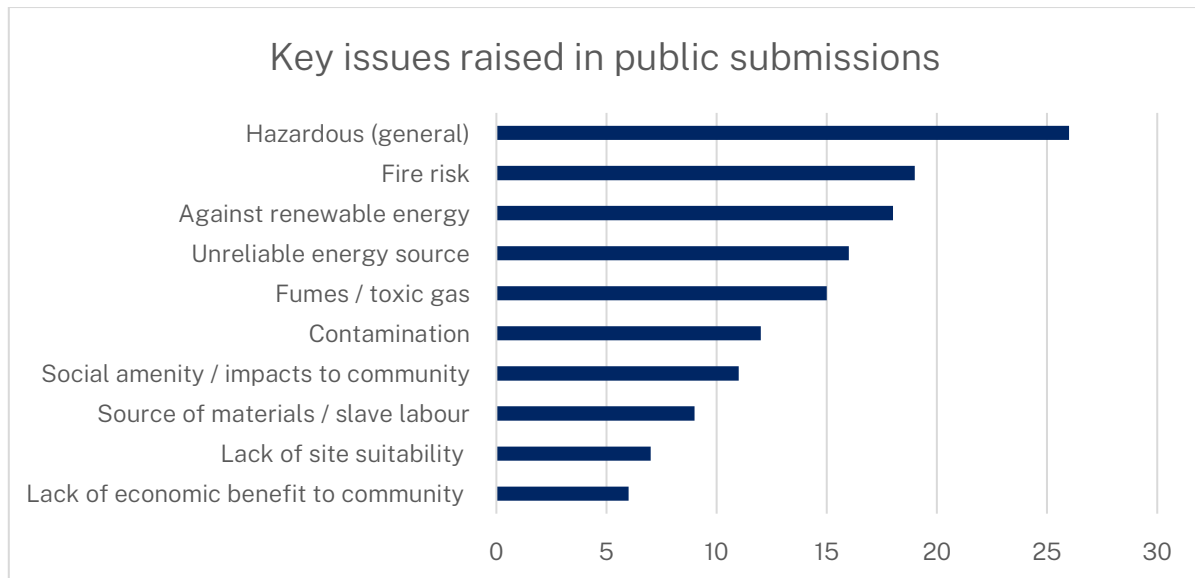


Figure 3 | Key issues raised in submissions

46. Other issues raised in objections included contamination, impacts to social amenity and community, source of materials, site suitability and lack of economic benefits to the community.
47. A further breakdown and summary of key issues raised by the public is summarised in **Appendix G. Section 5** of this report provides the Department's consideration of these matters and recommended conditions.

5 Assessment

48. The Department has undertaken a comprehensive assessment of the merits of the project. This report provides a detailed discussion of the key issues, namely the energy transition (**Section 5.1**), hazards and risk (including fire risk and contamination) (**Section 5.2**), noise (**Section 5.3**) and visual amenity (**Section 5.4**).
49. The Department has also considered the full range of other potential impacts associated with the project, as detailed in **Section 5.5**.

5.1 Energy transition

50. Concerns about the energy transition and renewable energy scepticism were raised in 34 submissions.
51. The project aligns with a range of Commonwealth and State policies (see **Section 2**), which identify the need to diversify the energy generation mix and reduce the carbon emissions intensity of the grid while providing energy security and reliability.
52. The project would support the State's continued transition away from traditional power generation derived from fossil fuels, which is largely dispatchable, to renewable energy generation such as wind and solar, which is inherently variable.
53. The AEMO's 2024 ISP forecasts that there will be a demand for 36 gigawatts (GW) / 522 gigawatt-hours (GWh) of energy storage capacity in the National Electricity Market by 2034-35, and 56 GW / 660 GWh by 2049-50. The ISP highlights the need for different forms of storage to support this growth, by providing storage of varied depths and technologies to time-shift electricity supply and smooth out peaks and troughs in renewable generation.
54. Battery storage, such as this one, provide 'firming capacity' by contributing to dispatchable energy availability during peak energy demands or when renewable production is low.
55. Importantly, the project would also contribute to energy security and reliability by providing frequency control ancillary services, meaning the project would contribute to energy supply.

5.2 Hazards and Risks

56. During exhibition, concerns about hazards, including the risk of fire, fumes / toxic gas, bushfire and/or contamination were raised in 31 public submissions.

5.2.1 Hazards analysis

57. Ausgrid's Preliminary Hazard Analysis (PHA) prepared as part of the EIS considered the risk associated with the transport and storage of hazardous materials associated with construction of the project, as well as operation of the BESS (including LFP BESS units, coolants associated with transformers and BESS units, and chemicals for maintenance activities), in accordance with

the *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP), and the relevant Hazardous Industry Planning Advisory Papers.

58. Ausgrid undertook a preliminary risk screening in accordance with the Department's *Hazardous and Offensive Development Application Guidelines – Applying SEPP 33*. The screening concluded that the transport and storage of hazardous materials for the project would not exceed the relevant risk screening thresholds, and the project is not considered to be potentially hazardous.
59. The PHA provided with the EIS considered risks associated with fires or explosions associated with lithium-ion battery fault and thermal runaway (i.e. overheating of chemicals in the battery), toxic gas dispersion and electromagnetic fields. The assessment concluded that, at a project level, potential risks could be minimised through appropriate design measures (e.g. separation distances between BESS units, setbacks to receivers, physical protection and automatic control systems) and the site includes sufficient area to accommodate the BESS components with adequate separation to the nearest residential receivers and between BESS units.
60. The PHA found that there is only a remote likelihood that toxic gases may be released in the event of the worst-case thermal runaway event. The PHA concluded that any toxic gases from a BESS fire are unlikely to pose a significant off-site hazard due to the BESS' outdoor location. Any hot smoke plumes would rise and disperse rapidly to below harmful levels. It also determined that the risk is comparable to that of a typical building fire, concluding that health and safety impacts at nearby locations such as public roads, DFO Homebush, and surrounding residential areas would be minimal.
61. During exhibition, the Department sought clarification on the originally proposed 2.44 m separation distance between BESS units, which could result in the risk of fire propagation (i.e. spreading) between battery units. In response, Ausgrid revised the layout to increase the separation distance between units to 3 m, resulting in a small decrease in the setback to the site boundary from 16 m to 11.8 m. The outcomes of the design changes were addressed in an addendum memorandum to the PHA. The memorandum concluded that, despite the decreased setback to the site boundary, the predicted heat radiation levels at nearby receivers would remain below the injury risk criteria specified in *HIPAP 4: Risk Criteria for Land Use Safety Planning*. The increased separation distance between battery units addressed the fire propagation concern and improves the overall fire risk management. The overall risk profile for the project was determined to be acceptable, as demonstrated through:
 - the PHA and supporting memorandum - which identified that the area allocated for the BESS is sufficient for the batteries and other associated equipment, and committed to appropriate separation distances between battery units and from receivers to minimise risk;
 - the separation of the nearest residential receiver being approximately 150 m to the south-east of the proposed battery unit location which provides separation for any potential heat radiation impacts from fires associated with the battery; and
 - the project's compliance with the *International Commission on Non-Ionizing Radiation Protection* guidelines for electric, magnetic and electromagnetic fields.
62. The Department consulted with FRNSW throughout the assessment and in preparing the recommended conditions of consent. FRNSW advised conditions requiring Ausgrid to prepare a

Fire Safety Study and a comprehensive Emergency Plan in consultation with FRNSW, would satisfy its recommendations and advised it had no further comments or concerns on the project.

63. To further ensure risks would be managed, a range of conditions have been recommended, including:
- infrastructure and engineering controls being installed and maintained (such as fire protection systems, fire-fighting equipment and vents);
 - conditions limiting the MW and MWh of the BESS and requiring the spacing of battery units to align with the risk assessments undertaken; and
 - preparation and implementation of an Emergency Plan and a Fire Safety Study in accordance with the requirements of the Hazardous Industry Planning Advisory Paper (HIPAP) No. 2 and FRNSW *Fire Safety Guideline Technical Information – Large scale external lithium-ion battery energy storage systems – Fire safety study considerations* to ensure that proposed fire prevention, detection, protection and fire-fighting measures are appropriate for the project.
64. The Department considers the fire and hazard risks for the project can be managed, subject to the recommendations of the PHA, preparation of a Fire Safety Study, and the Department's recommended conditions of consent, noting FRNSW has no outstanding concerns.

5.2.2 Contamination

65. Concerns about contamination were raised in 12 public submissions.
66. Ausgrid prepared a Preliminary and Detailed Site Investigation (PDSI), which included a desktop review, intrusive soil sampling investigations and laboratory analysis. The concentrations of all relevant contaminants of potential concern detected in the analysed soil samples were below the Health Investigation Levels for commercial and industrial land uses and open space. The PSDI concluded that no unacceptable human health risks associated with land contamination were identified in the areas assessed, and that the site could be made suitable for the proposed commercial and industrial land use scenario.
67. Due to access constraints onsite (i.e. overhead powerlines), potential contamination risks within three areas of concern could not be fully assessed within the PDSI. A Supplementary Contamination Assessment (SCA) was undertaken to assess one of these areas and concluded that, while no contamination requiring remediation was detected within assessed areas of the site, the presence of asbestos was identified in a previous investigation. Ausgrid has committed to undertaking a visual inspection by a suitably qualified person (licensed asbestos assessor) and a visual clearance report, prior to commencing construction.
68. Ausgrid provided further information during the Department's assessment to clarify that excavation is not proposed within the two inaccessible areas; however, should any excavation or ground disturbance within these areas be required, Ausgrid has committed to assessment of these areas. Should significant contamination be found, Ausgrid has further committed to management of residual risks through a Remedial Action Plan.
69. The Department considers contamination risk to be low, noting that the PDSI and SCA identified no unacceptable human-health risks. The two small areas that could not be accessed represent

an isolated risk of asbestos, that could be managed through standardised, well-established management methods. The Department is satisfied that contamination has been suitably assessed and that the site can be made suitable for the intended use, subject to the recommended conditions.

70. The Department has recommended conditions of consent requiring the preparation and implementation of a Detailed Site Investigation (DSI) and, where necessary, a Remedial Action Plan, prior to disturbance of soils within the inaccessible areas, to ensure any contamination is identified, managed and / or remediated, prior to construction of the battery energy storage facility. Should a Remedial Action Plan be required, a Site Audit Statement and Site Audit Report must be provided to the NSW Environment Protection Authority (NSW EPA) and Planning Secretary, confirming that the site has been made suitable for the intended land use. With these measures in place, the Department is satisfied that the site would be suitable for the proposed development.
71. The Department has recommended a condition of consent requiring the preparation and implementation of an unexpected contamination finds procedure to guide responses to finds of contaminated, hazardous or unsuitable material for the development.

5.2.3 Bushfire risk

72. Concerns about increased bushfire risk were raised in two public submissions.
73. The site is not mapped as bushfire prone land and a bushfire risk assessment under the *Planning for Bush Fire Protection 2019* (RFS, 2019) is not required.
74. The likelihood of a bushfire affecting the site is very low given its location within a developed commercial / industrial area with very minimal vegetation and the nearest mapped bushfire prone land being approximately 6 km from the site.
75. Given the low likelihood of bushfire, the RFS and the Department consider that no bushfire-specific conditions are required, and that any residual fire-related risks (such as a BESS fire igniting nearby land or an external fire affecting site infrastructure), can be effectively managed through the recommended conditions detailed in **Section 5.2.1**, including measures to manage onsite fire ignition risks, which would further minimise any residual bushfire risk.

5.2.4 Recommended conditions

76. The Department has recommended the following conditions of consent to manage hazards and risks associated with the development:
 - the BESS must not exceed the proposed total Maximum Energy Discharge Capacity of 200 MW and Maximum Energy Storage Capacity of 431 MWh across the project site and must be installed in an arrangement described in the EIS;
 - prepare a Fire Safety Study that meets the requirements of FRNSW and to the satisfaction of the Planning Secretary;
 - prepare an Emergency Plan and Emergency Services Information Package for the project;

- the development must include a minimum 10 m trafficable fire break around the perimeter of the battery storage area;
- all chemicals, fuels and oils to be stored in accordance with Australian Standards and EPA requirements;
- if excavation is proposed in the inaccessible areas, prepare a detailed site investigation (DSI) for those areas, and if the DSI identifies contamination requiring remediation to make the area suitable, prepare and implement a Remedial Action Plan to manage and/or remediate the contamination;
- if a Remedial Action Plan is required, provide a Section A1 or A2 Site Audit Statement (with Environmental Management Plan and Site Audit Report) to the EPA and Planning Secretary; and
- prepare and implement an Unexpected Finds Procedure to managed unexpected finds of contamination or unsuitable material throughout construction.

5.3 Noise

77. Three public submissions raised concerns about potential noise impacts (2 submissions on operational noise and 1 submission on construction noise).
78. Ausgrid prepared a Noise and Vibration Impact Assessment (NVIA) which assessed noise impacts at 48 selected, non-associated sensitive receivers located within 500 m of the site boundary, comprising:
 - 27 residential receivers;
 - 13 commercial receivers, including retail outlets (including DFO Homebush), IT and financial service providers, car repair and maintenance providers, and business and corporate offices;
 - 7 active recreation areas, including sporting facilities at Sydney Olympic Park (including Ken Rosewall Arena and Tennis World) and sporting grounds (including Mason Park and Bressington Park); and
 - 1 passive recreation area - Mason Park Wetlands.

5.3.1 Construction noise

79. The NVIA assessed six construction phases, identifying 'vegetation removal / site clearing' as the noisiest construction phase. The modelling assumed that for the 'vegetation removal / site clearing' phase all construction equipment would operate at the site boundary. For the other construction phases, it was assumed that construction machinery would operate at the outer extent of the areas designated for access roads, BESS units and noise walls.
80. Noise from construction is expected to exceed the Noise Management Level (NML) for residential receivers of 55 dB(A) under the EPA's *Interim Construction Noise Guidelines* (ICNG) at all 27 non-associated residential receivers for all construction phases by up to 24 dB(A). During the worst-case construction phase - 'vegetation removal / site clearing' – the 'highly affected' noise criterion of 75 dB(A) would be exceeded at 19 non-associated residential receivers by up

to 9 dB(A). The Department notes that this phase is only expected to last up to two weeks and is short-term.

81. Construction noise would also exceed the NMLs for commercial receivers (70 dB(A)), active recreation areas (65 dB(A)) and passive recreation areas (60 dB(A)), for the 'vegetation removal / site clearing' phase by up to 19 dB(A). Nine non-residential receivers would also exceed the relevant criteria during 'site establishment', 'civil works' and / or 'landscaping and noise wall' phases of construction, which are expected to last 3 months each.
82. Where construction noise levels are predicted to exceed the NMLs, Ausgrid would implement reasonable and feasible mitigation measures in accordance with the ICNG and in consultation with the community, in accordance with the recommendations of the NVIA, which include notification and offers of respite for some receivers. Ausgrid has also committed to scheduling high noise and vibration generating works during standard daytime working hours, and limiting works that would exceed 75 dB(A) at receivers to blocks of no more than three hours at a time, with at least one hour of respite.
83. Ausgrid has committed to developing and implementing a construction noise and vibration management plan (CNVMP) in accordance with the ICNG. The CNVMP would help minimise impacts on nearby residents by identifying feasible noise mitigation measures and best-practice construction management procedures and community engagement measures that would be implemented during construction to reduce noise disturbance where predicted noise levels exceed the relevant management goals. The Department has recommended conditions requiring Ausgrid to adhere to standard construction hours and minimise noise generated by construction, upgrading and decommissioning activities on site in accordance with best practice requirements outlined in the ICNG.

5.3.2 Operational noise

84. During preparation of the Submissions Report, Ausgrid refined the project design to further reduce operational noise impacts. This refinement included configuring the 8.5 m high noise walls along the northern, eastern and southern sides of the battery units and to address hazards related aspects. Ausgrid has also committed to limiting fan duty cycle speeds to ensure compliance with relevant noise criteria.
85. Operational noise modelling was assessed under worst-case, noise-enhancing meteorological conditions. With the proposed mitigation measures, operational noise levels would comply with the minimum criteria under the *NSW Noise Policy for Industry* (EPA, 2017) (NPfI) at all non-associated residential receivers during the daytime, evening and night-time periods. The Department notes that, as the assessment was undertaken under worst-case, noise-enhancing meteorological conditions, the predicted noise levels represent a conservative scenario. Compliance with the applicable noise criteria under these conditions provides confidence that noise levels would also comply during normal operating conditions, when noise transmission is generally less favourable.
86. For the surrounding non-residential receivers, which are not treated as noise-sensitive receivers under the NPfI, Ausgrid's assessment found that predicted noise levels would comply with the relevant criteria at the closest commercial premises, active recreation area and passive

recreation area. The Department has included recommended conditions of consent to manage operational noise impacts at residential, commercial and recreational facilities.

5.3.3 Road traffic noise and vibration

87. Road traffic noise during construction and operation would comply with the relevant criteria in the EPA's *Road Noise Policy*. Peak road traffic would occur during a peak 6-month construction period, with limited vehicle movements required during operation.
88. Compliance with the continuous maximum vibration nuisance criteria is predicted to occur at separation distances over 50-60 m, and compliance with building damage criteria is predicted at 60 m. Given that all receivers are located more than 70 m from construction works (from the site boundary), no vibration impacts are predicted during construction or operation.

5.3.4 Cumulative noise

89. Ausgrid considered cumulative construction noise and vibration impacts with other types of major projects and Strathfield Council Development Applications (DA) within 1 km of the project. Due to potentially overlapping construction periods, Ausgrid considered the construction of a warehouse and distribution centre at 179-181 Parramatta Road, Homebush West (DA 10.2024.128.1) and the upgrade works to the Homebush Bay Drive / Australia Avenue intersection. With the implementation of construction noise mitigation measures and due to the short duration of the project's noisiest construction phase (vegetation removal / site clearing) the Department considers that any potential cumulative construction noise impacts would be minimal. Due to the distance between the projects, cumulative vibration impacts on sensitive receivers are not anticipated.
90. Ausgrid considered the cumulative noise impacts during operation of the project with the HV connection infrastructure project, which is also located on the site. The cumulative noise assessment concluded that with the project mitigation measures and operational controls applied, compliance with the applicable criteria would be achieved at all receivers.
91. With the implementation of mitigation measures, cumulative noise impacts are expected to be minimal during construction, operation or decommissioning, and cumulative road noise impacts would comply with the EPA's *Road Noise Policy*.

5.3.5 Recommended conditions

92. The Department has recommended conditions requiring Ausgrid to minimise noise during the life cycle of the project.
93. To manage construction noise impacts the Department has recommended conditions restricting works to standard construction hours (i.e. 7 am to 6 pm Monday to Friday, and 8 am to 1 pm Saturday), with no works permitted on Sundays or NSW public holidays.
94. To manage operational noise impacts, the Department has recommended conditions requiring Ausgrid to meet operational noise criteria, take all reasonable and feasible steps to minimise

operational noise and undertake monitoring once the project is operational (including preparation of a Noise Monitoring Report).

95. With implementation of the proposed mitigation measures and recommended conditions of consent, including compliance with the NPfI, the Department considers that noise can be appropriately managed and would not impact the amenity of the locality.

5.4 Visual amenity

96. Five public submissions raised concerns about impacts to visual amenity. The concerns included potential impacts on viewpoints and on landscape character.
97. Ausgrid provided a Visual Impact Assessment (VIA) with the EIS, and a VIA memo with the Submissions Report.
98. The Department visited the site in December 2025 to assess visual impacts.

5.4.1 Visual context

99. The existing site and surrounding landscape are predominantly flat and largely industrial and commercial, with transmission towers, overhead powerlines, the nearby M4 Western Motorway and DFO Homebush, Sydney Olympic Park and other industrial facilities being the dominant features in the immediate surrounds.
100. The nearest residential receivers are located in two-storey apartments approximately 150 m south-east of the proposed battery unit location, however, existing intervening vegetation partially screens views toward the site. The main visual receivers of the site are from the DFO Homebush carpark, and motorists and cyclists travelling eastward on the M4 Western Motorway on-ramp and Western Motorway on-ramp / Access Road intersection.
101. The HV connection infrastructure project has been approved and is expected to be constructed by 2027. Once constructed it will increase the electrical infrastructure in the area around the site.

5.4.2 Visual mitigation

102. Mitigation measures include boundary screen plantings between the noise wall and perimeter fence along the north and east of the site, and retaining trees to minimise the loss of urban canopy cover where possible. Where possible, Ausgrid has committed to retaining trees within the site and providing tree canopy replacement planting where feasible.

5.4.3 Assessment

103. Ausgrid assessed visual impacts of the project from four representative viewpoints including from the M4 Western Motorway on-ramp (west), the DFO Homebush multi-storey carpark (north-east), residences at 9 Verley Drive (south-east), and Tennis World in the Sydney Olympic Park (north). Viewpoints represent potential views from both private residences and the public domain.

104. The project assessed a ‘worst-case’ visual impact based on 8.5-m-high noise walls assessed without the mitigation of the proposed landscape planting. The noise wall would be the most visible component, screening views of the battery units and ancillary infrastructure at ground level. Based on the worst-case scenario, the VIA concluded that the visual impacts at all representative viewpoints during construction and operation would be low to negligible due to intervening infrastructure, intervening buildings and vegetation and topography.
105. Council raised concerns about the visual impact of the noise wall and the loss of vegetation and canopy cover. In response, Ausgrid refined their development footprint to avoid some vegetation removal and prepared a landscape plan which identified areas for landscape planting. Ausgrid has also committed to retaining trees on site where feasible to minimise loss of urban canopy cover. However, it is noted that vegetation screening cannot be provided where it would present a hazard risk or conflict with fire breaks or overhead transmission infrastructure, including the minimum 10 m wide firebreak around the battery units included in the recommended conditions of consent.
106. Council also raised concerns about potential visual impacts on future high-rise residential development as part of the Homebush Transport Oriented Development precinct. The Visual Impact Assessment Memo, provided with the submissions report confirmed that, while views from the elevated apartments would include the battery units and ancillary infrastructure visible above the noise walls, the project would be visually consistent with existing adjacent electrical infrastructure and appear less bulky than nearby commercial and industrial buildings. The visual impact to these apartments was assessed to be very low.
107. Council confirmed that the matters raised above had been addressed subject to the recommended conditions of consent and the Department considers that the visual impacts can be appropriately mitigated through the management measures and recommended conditions. Furthermore, the project would be a minor cumulative increase to the existing and approved electrical infrastructure in the immediate vicinity of the project and would not fundamentally change the broader landscape characteristics of the area.

5.4.4 Recommended conditions

108. The Department has recommended conditions requiring Ausgrid to:
- develop a Landscape Plan in consultation with Council, prior to construction of the battery energy storage facility;
 - establish and maintain the vegetation buffer (landscaping) in accordance with the Landscape Plan, prior to commencing operation;
 - ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape;
 - minimise the off-site visual impacts of the development; and
 - minimise the off-site lighting impacts of the development.

5.5 Other issues

109. The Department's consideration of other issues is provided in **Table 6**.

Table 6 | Assessment of other issues

Issue	Recommended Conditions
Biodiversity • Five public submissions raised concerns about potential biodiversity impacts. • The site and surrounds have been extensively disturbed by historic and ongoing commercial, industrial and electricity supply activities. • The project site covers an area of 6.2 ha, which includes a development footprint of 2.95 ha. • A streamlined <i>Biodiversity Assessment Method 2020</i> (BAM) assessment for small areas was undertaken in the Biodiversity Development Assessment Report (BDAR), as the project does not exceed the area clearing threshold for small area developments as prescribed in the BAM. • A total of 0.6 ha of native vegetation would be cleared for the project, comprising 0.05 ha of good quality PCT 3962 Coastal Floodplain Phragmites Reedland, 0.17 ha of degraded PCT 4023 Coastal Valleys Riparian Forest, 0.12 ha of highly degraded PCT 4023 Coastal Valleys Riparian Forest and 0.26 ha of planted native vegetation that does not align with a mapped PCT. • Two Threatened Ecological Communities (TEC) listed under the <i>NSW Biodiversity Conservation Act 2016</i> (BC Act) are associated with PCTs on site: - Freshwater Wetlands on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions, associated with PCT 3962; and - Swamp Oak Floodplain Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions, associated with PCT 4023. • The impacts on native vegetation would generate 2 ecosystem credits for PCT 3962 (good quality), 3 ecosystem credits for PCT 4023 (degraded) and 1 ecosystem credit for PCT 4023 (highly degraded) under the BC Act and would be retired in accordance with the <i>NSW Biodiversity Offsets Scheme</i>. The planted native vegetation does not require offsetting under the BAM.	• Prior to carrying out any works that could directly or indirectly impact the biodiversity values requiring offset, retire the applicable biodiversity offset credits in accordance with the <i>NSW Biodiversity Offsets Scheme</i>. • All native vegetation retained during construction must be maintained and managed, including weed control and replacement of any retained vegetation that is removed or damaged as a result of the project.

Issue	Recommended Conditions
• The Department considers that the proposed impacts to 0.6 ha of native vegetation would make a negligible contribution to cumulative biodiversity impacts in the region. The Department notes that Ausgrid has refined the development footprint to retain vegetation by reducing the laydown area in the northern and south-eastern portions of the site. Ausgrid has committed to minimising the loss of urban canopy cover and retaining existing vegetation within the proposed laydown areas wherever practicable. Ausgrid has identified an area in the south-east of the development footprint that would not be used for construction or operation of the project. Vegetation clearing within this area would be avoided unless it is demonstrably required for safety reasons, to maintain tree health as confirmed through an arborist assessment, or for necessary weed management only. • CPHR raised no issues with the final project and advised that the BDAR met all relevant requirements. • The Department has recommended a condition requiring the remaining native vegetation onsite is appropriately managed and maintained. • Noting the above, the Department and CPHR consider the project is unlikely to result in a significant impact on biodiversity values.	
Traffic	
• Ten public submissions raised concerns about potential impacts on road safety and from construction and operational traffic. • All project related vehicles would access the site via Homebush Bay Drive, the M4 Western Motorway on-ramp, and the WestConnex Fulton Hogan Egis MCC Access Road (MCC Access Road). All plant deliveries would arrive from Port of Newcastle or Port Botany using this route. No local roads would be used by the project. • The site would be accessed from two access points off the MCC Access Road – the Northern Access point, which would be constructed as a part of the HV connection infrastructure project, and the Southern Access point, which would be constructed as part of the project. • The Northern Access point would operate as a shared access for the HV connection project and would be used by heavy vehicles, including heavy vehicles requiring escort (HVRE), during construction. During operation, the Northern Access point would serve as the primary access to the site. The Southern Access	• Comply with daily limits on the number of heavy vehicles accessing the site during construction, upgrading and decommissioning. • Ensure the length of vehicles does not exceed 26 m. • Restrict project related heavy vehicles to the use of the approved access routes only. • Prepare and implement a Traffic Management Plan in consultation with Council and

Issue	Recommended Conditions
point would be used only by light vehicles during construction and would remain locked during operation, available solely for emergency access. • During peak construction, the project would generate daily movements of up to 67 light vehicles, 19 heavy vehicles and 6 HVRE. Operational traffic would be negligible, generating a maximum of 2 vehicle movements per week. During the assessment process, the Department sought clarification from Ausgrid regarding the number of vehicles proposed, particularly noting that no high-risk heavy vehicles requiring escort would be required. Ausgrid has confirmed the numbers are appropriate for construction (and subsequent stages). • Traffic modelling indicates the proposed transport routes would have sufficient capacity to accommodate peak construction traffic at an acceptable level of service (LOS) A, with exception to right-turns at the Homebush Bay Drive / Western Motorway on-ramp intersection during morning peak hour, which would decrease the level of service (LOS) from a D to an E. During the peak construction period, the right-turn movement at this intersection recorded a degree of saturation (DoS) of 0.761 in the morning peak hour which is considered to still be operating at a 'good' level of service for a signalised intersection. The LOS E is attributed to the average delay of 59.5 seconds which is caused by the short green time of this phase and the overall cycle time of the signals, which requires vehicles making this movement to typically wait for one cycle. Overall, the Department considers that, while some movements may experience delays, the net change as a result of the additional project related traffic, would be minimal. • TfNSW raised concerns that allowing heavy-vehicle ingress and egress via the Northern Access point could introduce unnecessary risk by causing egressing heavy vehicles to block the MCC Access Lane, potentially affecting the safe operation of the M4 Motorway. In response, Ausgrid provided an updated TIA that includes a commitment to managing heavy-vehicle movements during construction through traffic control, with heavy vehicles stopped on the MCC Access Road or within the site as required to allow safe passing. TfNSW confirmed they are satisfied the concerns have been addressed, subject to the recommended conditions of consent. • Maintenance of the MCC Access Road would be handled under an <i>Access and Interface Agreement</i> between Ausgrid and Transurban. • Ausgrid considered the potential for cumulative traffic impacts from surrounding major projects within the Strathfield and surrounding LGAs and found that the road network would have sufficient capacity to accommodate traffic if concurrent construction were to occur, for which TfNSW did not raise concern	TfNSW and details of the measures that would be implemented to address road safety.

Issue	Recommended Conditions
Subject to the conditions, the Department considers that the project would not result in significant impacts to the road network capacity, efficiency or safety.	
Water	
- Nine public submissions raised concerns about potential water impacts. <u>Surface Water</u> - The site drains south-east to Saleyards Creek, a highly modified ephemeral open drainage channel, forming part of the local stormwater network and contained with shallow vertical concrete bank, which is located immediately east of the site. Saleyards Creek intersects Powells Creek, a highly modified first order watercourse, approximately 600 m north-east of the site. - Water quality within Saleyards Creek and Powells Creek is generally poor, characterised by low dissolved oxygen, elevated nutrient and heavy metal concentrations, and high turbidity. - Other surface water bodies in proximity to the site include Belvedere Lake, located approximately 370 m to the north of the site, and Mason Park Wetlands, located approximately 550 m to the north-east of the site. Badu Mangroves Wetlands are located approximately 1.2 km north of the site. - Potential surface water impacts during construction would primarily relate to earthworks and associated erosion and sediment generation. The Department is satisfied that Ausgrid's commitment to prepare and implement erosion and sediment controls in accordance with <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) would adequately manage these risks. - Other potential construction risks in relation to water quality relate to the use of hazardous materials during construction and the potential exposure of acid sulfate soils (see further discussion in the Soils sub-section below). Ausgrid has committed to prepare and implement a Construction Environmental Management Plan (CEMP) and a detailed Soil and Water Management Plan (SWMP) which would detail controls for the handling of hazardous materials. The Department has recommended conditions requiring storage and handling of chemicals, fuels and oils to be in accordance with the relevant Australian Standards and the NSW EPA guidelines. The Department has also recommended conditions of consent requiring the preparation of an Acid Sulfate Soil Management Plan.	- Ensure there is sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. - Ensure the project is designed, constructed and maintained to reduce impacts on water resources. - Minimise any soil erosion 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. - Water infrastructure must be designed, installed and maintained to avoid unlicensed or uncontrolled discharge of water. - Include a flood response plan for access to and from the site in event of flooding, in the Traffic Management Plan.

Issue	Recommended Conditions
- During operation, no significant volumes of chemicals or fuels would be stored on site and the battery units would be self-contained. Fuel would be stored in bunded areas and all stormwater runoff from the BESS area would be captured, prior to discharge from site. - Ausgrid has committed to installing a water-quality treatment chain designed to meet the pollution-reduction targets set out in Strathfield Council's Development Control Plan. Ausgrid has committed to managing water quality impacts during operation through ensuring all fuels, hazardous materials and transformers (containing mineral oils) are stored and handled safely, including the use of compliant bunding in accordance with relevant Australian standards. - With the implementation of these measures the Department considers there would be limited impacts to surface water. <u>Groundwater</u> - Based on the topography of the site, the inferred groundwater flow direction within the site is to the south-east towards Saleyards Creek. Ausgrid's Water Impact Assessment (WIA) identified that groundwater was not encountered in four of the five geotechnical boreholes drilled for the project, with one borehole in the south-eastern portion of the site recording shallow, unconfined groundwater at approximately 1 m below ground level (m bgl) (or, at 2.8 m AHD). A borehole drilled for Ausgrid's SCA encountered groundwater at 1.2 m bgl. The WIA concluded that, given the minor depths of excavation required for the project (extending to a maximum depth of 0.5 m) the likelihood of groundwater interception and impacts to groundwater are low. - No groundwater dependent ecosystems (GDEs) are located within the site. In the surrounding area, several potential GDEs, ranging from low to high potential, are located within 1.5 km of the project including the Mason Park Wetlands, Bressington Park and the Badu Mangroves Wetlands in Bicentennial Park. The WIA concluded that the project is unlikely to adversely affect groundwater resources or GDEs. - Operational activities present a potential risk of contaminating groundwater through diesel spills or oil leaks; however, with the water quality management and mitigation measures listed above in place, the likelihood of operational impacts on groundwater is considered low.	- In the Emergency Plan include: - details on flood emergency responses; and - emergency management and evacuation procedures and identification of specific emergency exit routes to be used during a flood event.

Issue	Recommended Conditions
<u>Flooding</u> • The site is identified as flood prone land under the Strathfield LEP. The <i>Powells Creek and Saleyards Creek Revised Flood Study</i> (WMAwater 2016), undertaken on behalf of Council, maps the site as being in both a mainstream and overland flood planning area, with the southern portion of the site mapped as ‘flood fringe’. • In response Council comments requesting on-site stormwater detention to reduce peak flood depths in Saleyards and Powells creeks, Ausgrid clarified that the project would not result in a substantial increase in impervious surfaces, and therefore an on-site stormwater detention is not considered necessary. Council raised no further concerns regarding flooding. • In response to comments from CPHR, Ausgrid prepared an Updated Flood Assessment that indicates for all modelled events up to and including the 1% annual exceedance probability (AEP) event the BESS unit pad surface levels would be elevated above flood levels by nearly 1.6 metres. During the future PMF climate scenario (2080) shallow, local overland flow was predicted across the BESS unit pads, with deeper flows along roadways. • Flood modelling for events up to the PMF under both current (2030) and future (2080) climate scenarios indicates slight improvements in flooding outside the site under the developed scenario, with only minor increases in flood depths south of the site that do not alter peak flood hazard categories, as these low-lying areas are already prone to inundation and tailwater effects from Saleyards Creek. • For all modelled conditions, up to and including the PMF under the 2080 climate change scenario, the site has predominantly been modelled as low hazard vulnerability (H1) and would generally remain safe for vehicles, people, and buildings. Localised flood hazards up to the H5 classification (unsafe for vehicles and people) are anticipated to occur only on the access roads at the south and north of the battery enclosure and in the south-east of the site, adjacent to Salesyard Creek, outside of the operational footprint. • Ausgrid has committed to addressing flooding during detailed design, including locating all critical infrastructure above the future (2080) PMF level for Salesyard Creek, where practicable. Ausgrid has also committed to preparation of a Flood Emergency Response Plan outlining how risks to life and property from flood would be managed during construction. <u>Water Supply</u> • The project would require up to 5.7 megalitres (ML) of water (5.5 ML of non-potable and 0.2 ML of potable water), during a maximum construction period of 22 months, for dust suppression, landscaping and workforce	

Issue	Recommended Conditions
consumption. Construction water would be sourced from Sydney Water via an approved standpipe. Potable water would be supplied through bottled water or the existing mains connection at the site, which would be augmented to facilitate the project. - Operational water supply would be sourced from mains connection. No water is proposed to be used for dirt suppression or emergency management purposes. - The Water Group and Council raised no concerns with the proposed water supply. - The Department requested further information regarding access to a secure water supply for firefighting purposes, including evidence of consultation with the water supplier (Sydney Water). Ausgrid confirmed it received a Statement of Available Pressure and Flow from Sydney Water, which stated that suitable water servicing for firefighting is available, with additional pumps potentially required to achieve suitable water pressure. Ausgrid would determine the requirement for water pumps as part of the Fire Safety Study. - The Department is satisfied that Ausgrid has demonstrated access to a reliable and sufficient water supply and has recommended conditions requiring Ausgrid to ensure it has sufficient water for all stages of development. - Subject to the recommended conditions, the Department considers that the project would not result in significant impacts on water resources.	
Soils	
- The site is located across three different soil landscapes (the Birrong soil landscape in the north, Blacktown soil landscape in the centre, and Disturbed Terrain in the south). Soil loss hazard ranges from very low to low. - Ausgrid undertook erosivity and dispersion tests on six soil samples and identified sodic soils in four samples indicating potential for moderate dispersion risk during earthworks and vegetation clearing. To manage this risk Ausgrid has committed to preparing a Soil and Water Management Plan (SWMP), including an Erosion and Sediment Control Plan (ESCP), which would adopt appropriate erosion and sediment control measures in accordance with <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) (the Blue Book). These plans would confirm the potential for dispersive soils and identify suitable measures to manage potential dispersive soils. Ausgrid has also confirmed sufficient space is available within the designated laydown areas to accommodate any erosion and sediment measures required.	- Prepare and implement an Acid Sulfate Soil Management Plan prior to commencing construction. - Minimise any soil erosion 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.

Issue	Recommended Conditions
- The EIS notes that the project is located on relatively level land and only minor earthworks are required to level and grade the area for the containerised battery units and ancillary infrastructure. No earthworks would be required to construct the laydown areas. - The site is mapped as potentially containing Acid Sulfate Soils under the Strathfield LEP. As noted above, Ausgrid prepared a PDSI and SCA, which assessed the potential for acid sulfate soils on site. Acid sulfate soils, in the form of potential acid sulfate soils, were identified within several test pits and boreholes at depths ranging from the surface to at least 2 m bgl. As excavations for the project would be minor and would not extend below a depth of 0.5 m bgl, the likelihood of disturbing acid sulfate soils is low. Ausgrid has committed to preparing an Acid Sulfate Soil Management Plan to outline management and treatment methodologies to be implemented during soil disturbance. - Council raised no concerns regarding soils on the site. - The Department considers the risk of encountering acid sulfate soils during construction to be low and manageable through standard practices, if required. The Department has recommended conditions of consent requiring preparation and implementation of an Acid Sulfate Soil Management Plan prior to commencing construction. The recommended conditions also require the project to be designed, constructed and maintained to minimise soil erosion and sediment generation. With these measures in place the Department is satisfied that there would be limited impact on soils.	
Heritage	
- Three public submissions raised concerns about heritage. <u>Aboriginal Cultural Heritage</u> - An Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared for the project in consultation with Registered Aboriginal Parties (RAPs), which included background research and site surveys. No Aboriginal cultural heritage items or areas of archaeological sensitivity were identified on site. - If Aboriginal artefacts or skeletal material are identified during construction of the project, Ausgrid has committed to ceasing work and implementing an Unexpected Aboriginal Heritage Finds Protocol. - Accordingly, the Department and Heritage NSW consider the project would not significantly impact the Aboriginal heritage values of the locality.	Prepare and implement a Chance Finds Protocol in consultation with Aboriginal stakeholders and Heritage NSW.

Issue	Recommended Conditions
<u>Historic Heritage</u> No heritage items listed on Commonwealth, National, or State registers are located within the site. Heritage NSW and Council did not raise concerns regarding historic heritage.	
Land Use Compatibility	
- Seven public submissions raised concerns about land use suitability, and one submission raised concerns about loss of agricultural land. - The site is located immediately adjacent to an Ausgrid owned substation and would have direct access to the electricity network. - The site has been used for electricity distribution related works since 1968 and is zoned SP2 Infrastructure (Electricity Supply). The area surrounding the site is primarily used for industrial and commercial uses. - The Department considers that the project is suitable within the land use context of the locality, is consistent with objectives of the SP2 Infrastructure (Electricity Supply) land use zone under the Strathfield LEP, and would not detract from the character of the area or result in any land use conflicts. - Given the site context, and in consideration of the impacts of the project, the Department considers the project would not result in the loss of agricultural land, and any amenity impacts of the development could be managed through the recommended conditions of consent.	No specific land use conditions required.
Waste	
- Four public submissions raised concerns about waste. - Waste generated during construction would be managed in accordance with a waste management plan and the waste hierarchy approach of avoidance and reuse before consideration is given to disposal. - Ausgrid has committed to preparing and implementing a Waste Management Plan for all phases of the project. - Standard construction waste such as green waste (vegetation), wastewater, personnel waste and excess excavated materials would be generated during construction of the project, with materials recycled where possible or taken to an appropriate waste disposal facility. Waste facility locations in Auburn and Strathfield have been identified and would utilise the proposed access route.	- Minimise the waste generated by the development. - Classify all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> (or its latest version). - Store and handle all waste on site in accordance with its classification.

Issue	Recommended Conditions
- During operation, generation of waste would include maintenance and operational waste and on-site office waste and would be managed using conventional waste collection, handling and disposal procedures. - During decommissioning, waste management would focus on avoidance, reuse and finally disposal. Ausgrid has committed to recycling batteries at an approved recycling facility or returned to the manufacturer for refurbishment. - The Department has recommended conditions requiring Ausgrid to reduce waste, recycle where possible, and to dispose of all waste generated on site in accordance with the EPA's <i>Waste Classification Guidelines 2014</i> and taken to a facility licenced to accept that waste. Accordingly, the Department considers that the waste generated by the project would be appropriately managed.	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.
Social and Economic - Eleven public submissions raised concerns about social impacts, and another eight raised concerns about potential economic impacts and property devaluation. - The project would generate direct and indirect benefits to the local community, including: - about \$215 million capital investment into the NSW economy; - up to 100 construction jobs and 1 operational job; and - a commitment to procure local goods and services by Ausgrid and their contractors, along with the hiring of local workers. - 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. Construction impacts would be temporary and can be managed through standard conditions without creating a need for new or upgraded local public infrastructure. Given that the project would not generate ongoing demand for transport, social or community infrastructure managed by Council, the Department considers that applying a Section 7.11 or 7.12 levy under the EP&A Act is not justified. - The Department is aware that Ausgrid and Council are negotiating a Voluntary Planning Agreement (VPA). The VPA contributions to Council would comprise contributions to a range of Council infrastructure projects, as agreed by Council. This agreement is separate to the Department's assessment of the project. - Noting the above, the Department considers that the project would have positive socio-economic impacts on the community.	No specific social and economic conditions required.

Issue	Recommended Conditions
Cumulative Impacts - Ausgrid undertook an assessment with reference to the <i>Cumulative Impact Assessment Guidelines for State Significant Projects</i> that considered the potential cumulative impacts with other nearby SSD, State significant infrastructure (SSI), major projects and local Council DAs. - Cumulative impacts from renewable energy projects in the Sydney Metropolitan Region are not anticipated, as the projects would commence construction at different times or are spatially separated by established metropolitan suburbs and associated urban infrastructure. Ausgrid considered potential cumulative impacts with other types of major projects and Strathfield Council DAs within 1 km of the project, including the construction of a warehouse and distribution centre at 179-181 Parramatta Road, Homebush West (DA 10.2024.128.1) and the upgrade works to the Homebush Bay Drive / Australia Avenue intersection. Ausgrid's assessment concluded that potential cumulative water quality, noise and vibration, and traffic and transport impacts of the project with these projects would not be significant. - Council raised no concerns regarding cumulative impacts. - Potential cumulative impacts have been addressed by the Department, operational noise (Section 5.3.2), construction noise and vibration (Section 5.3.4), and visual impacts (Section 5.4). All other issues are expected to have negligible or minor cumulative impacts. - The Department considers that any residual cumulative impacts associated with the project and surrounding operations, would be adequately managed through the proposed mitigation measures and conditions of consent.	Prepare and implement a Traffic Management Plan, including measures to minimise potential cumulative traffic impacts with other projects in the area construction, upgrading or decommissioning works.
Air quality - Construction of the project would generate airborne dust emissions from ground disturbing works such as earthworks for site preparation, vegetation clearance and the movement of vehicles, as well as emissions from vehicles, construction plant and equipment. - Ausgrid has committed to managing air quality impacts during construction by implementing standard dust control measures, including the use of water trucks / hoses, covering loads when transporting materials and equipment, adjusting works under adverse weather conditions (hot, dry, and windy conditions), undertaking visual air-quality monitoring to verify the effectiveness of controls, maintaining plant and equipment in good condition, and minimising idling by switching off plant and machinery when not in use.	- Minimise the dust generated by the development. - Maintain and operate all plant in a proper and efficient manner.

Issue	Recommended Conditions
The Department considers that air quality impacts from the project would be appropriately managed through implementation of the proposed mitigation measures and adherence with the recommended conditions.	
Decommissioning and Rehabilitation	
- The operational life of the project is approximately 50 years, with upgrades to battery units anticipated after about 20 years. - The Department has developed standard conditions for battery projects to cover this stage of the project life cycle, including clear decommissioning triggers and rehabilitation objectives. - With the implementation of these measures, the Department considers that the battery would be suitably decommissioned at the end of the project life, or within 18 months if operations cease unexpectedly, and that the site would be appropriately rehabilitated.	Comply with rehabilitation objectives requiring the site to be rehabilitated within 18 months of cessation of operations.

6 Evaluation

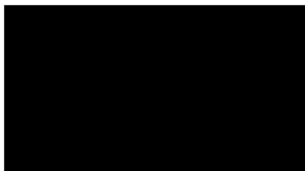
110. The Department has assessed the development application, EIS, Submissions Report, Amendment Report and additional supporting documents provided by Ausgrid and has carefully considered:
- submissions received;
 - comments provided by Council; and
 - advice received from government agencies.
111. The site is located on land zoned SP2 Infrastructure (Electricity Supply) and is permissible with consent in accordance with the Transport and Infrastructure SEPP. The site has been previously used for industrial purposes and is appropriately sited adjacent to the existing Ausgrid Mason Park Sub-transmission switching station with access to the State Road network via the WestConnex Fulton Hogan Egis Motorway Control Centre Access Road.
112. The Department has considered the objectives of the EP&A Act (at the time of exhibition of the EIS), including the Ecologically Sustainable Development principles, and relevant considerations under Section 4.15(1) of the EP&A Act. The Department has given consideration to Ausgrid's evaluation of the project's merits against applicable statutory and strategic planning requirements.
113. The project has been sited and designed to avoid native vegetation and mitigate noise and amenity impacts, while maintaining its ability to utilise the existing electricity infrastructure and road network. Any residual impacts would be minor and can be managed through the recommended conditions.
114. The Department considers that there would be no significant visual impacts on surrounding residences, due to intervening existing electrical infrastructure, vegetation and topography. In addition, Ausgrid has proposed vegetation screening to further reduce potential visual impacts. The Department considers the project would not result in unacceptable noise amenity impacts, and that operational noise can be effectively managed through mitigation measures including noise walls, battery enclosure orientation and management of fan speeds.
115. The project would result in the loss of approximately 0.6 ha of native vegetation. With appropriate management measures and ecosystem credits, the Department considers the biodiversity impacts to be acceptable.
116. Of the 63 submissions received during the exhibition of the EIS, four submissions came from within 5 km of the site (one objection, one submission of support and two comments). The Department considered the submissions made through the exhibition of the project and the issues raised by the community, agencies and Council during consultation, including energy security, fire safety and firefighting risk, contamination risk, amenity impacts and site suitability. These matters have been addressed through the recommended conditions of consent, including strict requirements to manage any hazards and fire risk, and amenity impacts.
117. The project would provide flow-on benefits to the area, including up to 100 construction jobs during peak construction and a capital investment of \$215 million.

118. The project is strategically located within the Sydney Metropolitan Region where electricity demand is heavily concentrated. The project benefits from direct access to the State road network to facilitate construction and ongoing servicing, and is immediately adjacent the existing Mason STSS. Its location within Sydney's metropolitan load centre would enable the efficient storage and dispatch of energy to the grid during periods of peak demand, supporting network reliability.
119. On balance, the Department considers the site to be appropriate for a BESS as it has ready access to major electricity transmission network infrastructure. Further, the project would provide additional and substantial investment towards improving the reliability of the energy network, storage and firming capacity to the National Energy Market, and additional services to assist grid stability, including frequency control ancillary services.
120. On balance, the Department considers that the project is in the public interest and is approvable, subject to the recommended conditions of consent (see **Appendix F**).
121. This assessment report is hereby presented to the Commission to determine the application.

Prepared by:

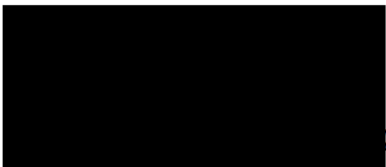
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2/07/2026

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Appendices

Appendix A – Environmental Impact Statement

Appendix B – Submissions

Appendix C – Agency advice

Appendix D – Submissions report

Appendix E – Additional information

Appendix F – Recommended development consent

Appendices A to G available at: <https://www.planningportal.nsw.gov.au/major-projects/projects/homebush-battery-energy-storage-system>

Appendix G - Consideration of community views

The Department exhibited the EIS for the project from 19 June 2025 until 21 July 2025 and received 63 unique submissions from the community (59 objections, 1 supporting submission and 2 comments), including 9 objections from organisations.

Around 84% of submissions (53 submissions) were received from over 100 kms from the site (including submissions made from interstate), 10% (6 submissions) were from residents located regionally (5 – 100 km from the site) and 6% (4 submissions) were received from residents located locally (within 5 km of the site).

The Department consulted with government agencies and Council throughout the assessment process.

The key issues raised by the community (including in public submissions) and considered in the Department's Assessment Report include hazards, fire risk, the renewable energy transition and scepticism, and fumes / toxic gas.

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

Issue	Consideration
Hazards (fire risk, and fumes / toxic gas)	<i>Assessment</i> • Ausgrid has undertaken a Preliminary Hazards Analysis (PHA) which concluded that the risks would not exceed the acceptable risk criteria or can be mitigated subject to implementation of the recommendations. • The PHA concluded that toxic gases from a fire within the BESS would be unlikely to create significant off-site impacts, as the outdoor setting would allow smoke to rise and disperse quickly. It found the overall risk to be similar to a standard building fire, with minimal health and safety impacts expected for nearby roads, the Direct Factory Outlet, or surrounding homes. • The site is not mapped as bushfire prone land and a bushfire risk assessment under the <i>Planning for Bush Fire Protection 2019</i> (RFS, 2019) is therefore not required. • To actively manage fire risk, a minimum 10 m trafficable fire break around the perimeter of the battery storage area would be established and maintained. • A Fire Safety Study would be prepared along with an Emergency Plan to support the development. • Conditions • The BESS must not exceed the proposed total Maximum Energy Discharge Capacity of 200 MW and Maximum Energy Storage Capacity of 431 MWh across the project site and must be installed in an arrangement described in the EIS. • Develop a Fire Safety Study prior to the commencement of construction of the battery storage facility (including associated foundations and cabling). • Develop an Emergency Plan and Emergency Services Information Package prior to commencement of commissioning of the battery storage facility. • Include a minimum 10 m trafficable fire break around the perimeter of the battery storage area. • Store and handle all chemicals, fuels and oils to be stored in accordance with relevant standards.

Issue	Consideration
Hazards (contamination)	<i>Assessment</i> • Ausgrid prepared a Preliminary and Detailed Site Investigation (PDSI) and Supplementary Contamination Assessment (SCA) which concluded that no unacceptable land contamination human health risks were identified for the site within the soils assessed. • Ausgrid has clarified that excavation is not proposed within two inaccessible areas on the site which have been noted as data gaps within the SCA. However, should excavation within these areas be required, Ausgrid has committed to assessment of these areas. Should significant contamination be found, Ausgrid has further committed to management of residual risks through a Remedial Action Plan (RAP). • On this basis, the Department considers contamination risk to be low, and that the site can be made suitable for the project, subject to implementation of the proposed mitigation measures and the recommended conditions. <i>Conditions</i> • If excavation is proposed in the inaccessible areas, prepare a detailed site investigation (DSI) for those areas, and if the DSI identifies contamination requiring remediation to make the area suitable, prepare and implement a RAP to manage and/or remediate the contamination. • If a RAP is required, provide a Section A1 or A2 Site Audit Statement (with Environmental Management Plan and Site Audit Report) to the EPA and Planning Secretary. • Prepare and implement an Unexpected Finds Procedure to managed unexpected finds of contamination or unsuitable material throughout construction.
Renewable energy transition	<i>Assessment</i> • The project aligns with a range of Commonwealth and State policies, which identify the need to diversify the energy generation mix and reduce the carbon emissions intensity of the grid while providing energy security and reliability. • Battery storage provides ‘firming capacity’ by contributing to dispatchable energy availability during peak energy demands or when renewable production is low. • The project would contribute to energy security and reliability by providing frequency control ancillary services and system restart ancillary services, meaning the project would contribute to energy supply. <i>Conditions</i> • Minimise harm to the environment.

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 assessment 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 (at the time of exhibition of the EIS); and
- the matters listed under Section 4.15(1) of the EP&A Act (at the time of exhibition of the EIS), including applicable environmental planning instruments and regulations.

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

Table H- 1 | Assessment against the provisions of the EP&A Act

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 energy storage adjacent to an existing substation;
- 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.

The Department has considered the principles 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 and seeks to avoid any potential serious or irreversible environmental damage, based on an assessment of risk-weighted consequences.

In addition, the Department considers that appropriately designed SSD solar facility development, in itself, is consistent with many of the principles of ESD. Ausgrid 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 least

Summary

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** 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 the way of objection to the application.

Table H-2 | Department’s assessment against the provisions of the relevant State Environmental Planning Policies (SEPP)

Clause	Consideration and Comments
State Environmental Planning Policy (Resilience and Hazards) 2021	
Chapter 3 – Potentially Hazardous and Offensive Development Object to ensure that in considering any application to carry out potentially hazardous or offensive development, the consent authority has sufficient information to assess whether the development is hazardous or offensive and to impose conditions to reduce or minimise any adverse impact.	Ausgrid provided a risk screening in its Preliminary Hazard Analysis confirming the transport and storage of hazardous materials for the project would not exceed the relevant risk screening thresholds and the project is not considered to be potentially hazardous in respect of the storage of dangerous goods. Consequently, the Department considers that the project is not categorised as potentially hazardous or potentially offensive development. Ausgrid’s PHA and updated Preliminary Hazard Analysis memorandum confirmed that the fire risks associated with the BESS meet the qualitative risk criteria outlined in Hazardous Industry Planning Advisory Paper No. 4, and that the implementation of the identified controls would appropriately minimise the risk of fire propagation between batteries. Consequently, the Department considers that the project does not exceed the acceptable risk criteria and would not significantly increase risks to the surrounding areas.

Clause	Consideration and Comments
Chapter 4 – Remediation of land Object to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment – (a) by specifying when consent is required for remediation work, and (b) by specifying certain considerations that are relevant in determining development applications.	The Department noted that the site is not listed as a contaminated site in the NSW EPA Contaminated Land Record and list of NSW contaminated sites. A Preliminary and Detailed Site Investigation (PDSI) was prepared by a suitably qualified person, which identified no unacceptable land contamination human health risks within the soils assessed. Due to access constraints onsite, potential contamination risks within three areas of concern could not be fully assessed within the PDSI. A Supplementary Contamination Assessment (SCA) was undertaken to assess one of these areas and concluded that, while no contamination requiring remediation was detected within assessed areas, the presence of asbestos was identified from a review of a previous investigation. Ausgrid has committed to undertaking a visual inspection by a suitably qualified person (licensed asbestos assessor) and a visual clearance report, prior to commencing construction. The Department notes that sampling covered a majority of the site and considers that the risk of contamination within the site has been sufficiently characterised and that the risk of contamination in the inaccessible areas is low. Additionally, Ausgrid has confirmed that soil disturbance within those areas would be avoided where feasible and that excavation is not proposed within the two inaccessible areas. The Department further considers that any remediation works that may be required in these areas would be minor and would not change the design or impacts of the project. To confirm the status of contamination within areas that were previously inaccessible, the Department has recommended conditions of consent requiring further assessment of soils prior to disturbance of soils in those areas and, if contamination is found, the development and implementation of a Remedial Action Plan (RAP) and a Site Audit Statement. Subject to these recommended conditions of consent the Department is satisfied that the site could be made suitable for commercial and industrial land use scenarios.
State Environmental Planning Policy (Transport and Infrastructure) 2021	
Section 2.48 – Determination of development applications – or other development	In accordance with the Transport and Infrastructure SEPP, the Department has given written notice of the project to Ausgrid (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. The development does not have frontage to any classified roads (s2.119).

Table H- 3 | Assessment against the provisions of the Strathfield LEP

Clause	Consideration and Comments
Strathfield LEP 2012	
<u>Section 5.10 Heritage conservation</u> The consent authority must, before granting consent, consider the effect of the proposed development on the items or areas of historic and Aboriginal heritage significance.	Ausgrid assessed Aboriginal and historic heritage in Table 4-5 of the EIS and in the Aboriginal Cultural Heritage Assessment Report (ACHAR). These assessments concluded that the project would not impact any items of Aboriginal or historic heritage significance. The Department has considered the effect of the proposed development on the items or areas of historic and Aboriginal heritage significance in Section 5.5 of the Department's Assessment Report and concludes that the project would not significantly impact the historic or Aboriginal heritage values of the locality.
<u>Section 5.21 Flood Planning</u> Development consent must not be granted for development on land within the flood planning area unless the consent authority is satisfied that the project is compatible with flood behaviour, will not worsen flood impacts for others, will allow safe occupation and evacuation, incorporates appropriate life-safety measures, and avoids environmental harm.	A Planning Certificate requested and received from Strathfield Council identified the site as being within a flood planning area. Ausgrid assessed flooding impacts in the Water Impact Assessment (WIA). This is noted in Section 5.5 of the Department's Assessment Report. The Department considers that the project would not change flood function or behaviour and would not worsen flood impacts of other development or properties. The project would not impact Saleyard Creek and Ausgrid would avoid impacts to vegetation along the drainage line, where feasible, which would maintain the stability of the banks. Ausgrid have committed to designing the project to be above the 1% annual exceedance probability (AEP) event and ensuring all infrastructure would be structurally sound and stable in the probable maximum flood (PMF) event. Ausgrid has committed to preparing and implementing a Flood Emergency Response Plan (FERP), prior to construction, which would address safe occupation and evacuation.
<u>Section 6.1 Acid sulfate soils</u> Development consent must not be granted under this clause for the carrying out of works unless an acid sulfate soils management plan has been prepared for the proposed works in accordance with the Acid Sulfate Soils Manual and has been provided to the consent authority.	This is noted in Section 5.5 of the Department's Assessment Report. The site is mapped under the LEP as being potentially affected by Class 2 and 5 ASS. Ausgrid prepared a PDSI and SCA, which assessed the potential for acid sulfate soils (ASS) on site. ASS, in the form of potential acid sulfate soils (PASS), were identified within several test pits and boreholes at depths ranging from the surface to at least 2 metres below ground level (m bgl). As excavations for the project would be minor and would not extend below a depth of 0.5 m bgl, the likelihood of intercepting ASS is low. Ausgrid's SCA reported groundwater at 1.2 m bgl, and given the minor depths of excavation required for the project, the likelihood of groundwater interception and impacts to groundwater are also low. Ausgrid has committed to preparing an ASS Management Plan (ASSMP) to outline management

Clause	Consideration and Comments
	and treatment methodologies to be implemented during soil disturbance. The Department notes that the risk of encountering acid sulfate soils for the project is low and could be managed by standard management practices. The Department has recommended a condition of consent requiring preparation and implementation of an Acid Sulfate Soil Management Plan (ASSMP) in accordance with the <i>Acid Sulfate Soils Manual</i> (1998), prior to commencing construction.
<u>Section 6.2 Earthworks</u> Ensure earthworks do not have a detrimental environmental impact. The consent authority must consider: • drainage patterns and soil stability • future redevelopment of the land • quality and source of fill • amenity impacts on adjoining properties • likelihood of disturbing relics • proximity to and potential impacts on waterways	Due to the relatively flat terrain of the Project Area, bulk earthworks would be restricted to site levelling and grading for hardstand for the containerised battery units and ancillary infrastructure. No earthworks would be required to construct the laydown areas. There would be no major cut and fill work or significant stockpiling of earth. The Department's consideration of these matters is summarised in Section 5.5 of the Assessment Report. <u>Drainage patterns and soil stability</u> Erosion from concentrated flows would be minimised through appropriate drainage, erosion and sediment control measures, as required under recommended condition B23(a) and (b). The Department has recommended conditions requiring that the project has water storage infrastructure to avoid unlicensed or uncontrolled discharge of water (recommended condition B23(c)) and does not cause any increased water being diverted off the site or alter hydrology off site (recommended condition B23(d)). <u>Future use or redevelopment of the land</u> As stated in the Assessment report, the Department considers the site could be rehabilitated when the project is decommissioned and has recommended rehabilitation objectives requiring Ausgrid to ensure the site is safe, stable and non-polluting (condition B33). <u>Quality of fill and its source</u> The extent and volume of excavations and fill material, as well as its use, storage and management, would be identified during detailed design. As noted above, the extent of earthworks for the project would be minor, due to the flat terrain of the site. The Department considers that excavated and fill material can be appropriately managed through the recommended conditions. <u>Amenity impacts on adjoining properties</u> Subject to the recommended conditions and implementation of the visual mitigation measures, the Department's assessment concluded that the project would not have any unacceptable visual amenity

Clause	Consideration and Comments
	impacts on adjoining properties (see Section 5.4.2 of the Department's Assessment Report). Construction noise impacts from earthworks would exceed the 'highly affected' noise criterion of 75 dB(A) at non-associated receivers; however, these impacts would be temporary, not lasting more than 2 weeks during the noisiest construction stage and Ausgrid have committed to respite hours (see Section 5.3.1 of the Department's Assessment Report). With implementation of the mitigation measures proposed by Ausgrid and the recommended conditions of consent, the Department considers that earthworks for the project would result in minimal and temporary impacts on the amenity of adjoining receivers. <u>Likelihood of impacts on relics</u> As noted above, the project would not impact on Aboriginal or historic heritage items. The Department has recommended a condition requiring the preparation and implementation of a Chance Finds Protocol, to manage potential impacts to unexpected Aboriginal heritage relics (recommended condition B12). <u>Proximity and potential for adverse impacts on waterways</u> The project is not within a drinking water catchment or environmentally sensitive area. Saleyards Creek and Powells Creek would be avoided and the site does not contain any natural watercourses (Section 5.5 of the Department's Assessment Report). Recommended conditions require the Applicant to not alter offsite hydrology and ensure water infrastructure is designed, installed and maintained to avoid unlicensed or uncontrolled discharge of water (recommended condition B23). With the implementation of these conditions the Department considers that impacts to waterways are unlikely.

Clause	Consideration and Comments
<u>Section 6.4 Essential services</u> The consent authority must be satisfied that essential services are available or can be made available, including: (a) the supply of water, (b) the supply of electricity, (c) the disposal and management of sewage, (d) the disposal and recycling of waste, (e) stormwater drainage or on-site conservation, (e) suitable road access.	Existing essential services, such as water supply, electricity connections, sewer connections, stormwater drainage are provided within the site. Essential services infrastructure would be augmented to facilitate the project, where required. During construction sewage would be collected, pumped-out and transported offsite for disposal via the existing sewage system. During operation the project would be connected directly to the existing sewer line that services the Mason Park STSS. Waste generated during construction would be reused where possible, or transported to an offsite recycling or disposal facility. Waste generated during operation would be managed using conventional waste collection, handling and disposal procedures. The Department has recommended a condition to this effect (B34). Suitable vehicular access to the site is proposed from via an existing driveway to the WestConnex Fulton Hogan Egis Motorway Control Centre, from the M4 Western Motorway on-ramp (eastbound).