SOUTH AUSTRALIA

Government of South Australia
Department for Energy and Mining

Consultation by the Minister

Port Lincoln Battery Energy Storage System (BESS)



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Acknowledgement of Country
As guests here on Kaurna land, we acknowledge everything this department does impacts on Aboriginal country, the sea, the sky, its people and their spiritual and cultural connection which have existed since the first sunrise. Our responsibility is to share our collective knowledge, recognise a difficult history, respect the relationships made over time, and create a stronger future. We are ready to walk, learn and work together.

Date:	Comment:
26/10/2026	First published

Public consultation – Act requirements

Under section 72 of the *Hydrogen and Renewable Energy Act 2023* (the Act), the Minister must undertake public consultation on an environmental impact report (EIR), statement of environmental objectives (SEO), and a scoping report (where a scoping report has been developed). Regulation 39 of the *Hydrogen and Renewable Energy Regulations 2024* (the Regulations), set out the requirements for public consultation.

This report has been developed pursuant to regulation 39(5), which requires that copies of written submissions and responses made during the consultation by the Minister be available for inspection on the register. Note that, under regulation 39(6) the Minister may refuse to publish submissions made on grounds that the submissions are irrelevant, offensive, or on any other grounds the Minister thinks fit.

Section 73 and regulation 40 of the Act requires that an EIR, SEO, and scoping report (where developed), refer the documents to prescribed bodies for a response. The Act and Regulations do not require that submissions and responses made during the referral period are published on the register, however, these have been included in this document for transparency and completeness.

Submissions received during the public consultation and referral period and the proponent's responses are reported below in Appendix A and B.

Public consultation – Port Lincoln BESS EIR and SEO

In accordance with the Act and Regulations, the **Port Lincoln Battery Energy Storage System (BESS) Environmental Impact Report (EIR)** and **Statement of Environmental Objectives (SEO)** were published for public consultation and referred to relevant prescribed bodies and agencies meeting the minimum of 30 business day requirement, between 14 February 2026 and 30 March 2026.

Pursuant to regulation 39(2), a notice was published specifying a place at which a copy of the relevant report and statement could be obtained and invited written submissions in relation to these reports. The notice was published in The Advertiser (14 February 2026), Eyre Peninsula Advocate (19 February) and Port Lincoln Times (19 February 2026).

The documents were provided to the following referral bodies and stakeholders for comment:

- Department for Infrastructure and Transport (DIT)
- Department for Environment and Water (DEW)
- Department for Housing and Urban Development (DHUD)
- Department of Primary Industries and Regions (PIRSA)

- South Australian Country Fire Service (SACFS)
- Air Services Australia
- Lower Eyre Council (LEC)
- Eyre Peninsula Landscape Board (EPLB)
- Environmental Protection Authority (EPA) – advice

Several public submissions were received from two adjacent landowners pursuant to regulation 39. Responses were received from referral bodies pursuant to regulation 40, from all referral bodies mentioned above. The submissions are provided below in Appendix A.

Responses to these submissions by the proponent have been extracted from the EIR and provided in Appendix B of this report. The full versions of the EIR and SEO are available on the Hydrogen and Renewable Energy Register.

Appendix A – Submissions received

From: Airport Developments <Airport.Developments@AirservicesAustralia.com>
Sent: Monday, 16 March 2026 8:40 AM
To: [redacted] (DEM); [redacted] (DEM)
Cc: [redacted] (DEM); [redacted] (DEM); airspace.protection@casa.gov.au
Subject: Airservices response: SA-MA-100 - HRE Act referral - Request for comment: Pt Lincoln BESS EIR & SEO

OFFICIAL

Hi [redacted],

I refer to your request for an Airservices assessment of the proposed activity at Lot 506 Flinders Highway, Duck Ponds, SA.

Airspace Procedures

Not requested.

Communications/Navigation/Surveillance (CNS) Facilities

We have assessed the proposed activity to the above specified height for any impacts to Airservices Precision/Non-Precision Navigation Aids, Anemometers, HF/VHF/UHF Communications, A-SMGCS, Radar, PRM, ADS-B, WAM or Satellite/Links and have no objections to it proceeding.

Note: Meteorological instruments not owned by Airservices were not considered in this assessment. In accordance with Part 139 (Aerodromes) Manual of Standards, Chapter 19, we recommend consulting with the Bureau of Meteorology (the Bureau) to ensure that the proposed activity does not adversely affect their equipment. The Bureau can be contacted at

airport.developments@bom.gov.au

Air Traffic Control (ATC) Operations

There are no additional instructions/concerns from ATC.

Summary

The proposed activity does not impact Airservices operations or facilities at any aerodrome.

[redacted]
Aeronautical Information Specialist
Da Vinci Building 101, 2A Boronia Road,
Brisbane Airport QLD 4008, Australia
www.airservicesaustralia.com

Date:	25/03/2026
Our reference:	20260325-01jp
Your reference:	NA

South Australian Country Fire Service Development Assessment Services
BUSHFIRE PLANNING HAZARD PROTECTION RESPONSE

Application	Associated Infrastructure Licence (Energy Infrastructure Facility)
Nature of Development	The BESS is proposed to facilitate 150 megawatts (MW) / 600 megawatt-hours (MWh) of energy storage. Other elements to include: • Bi-directional inverters and associated power electronics • Coupling transformer • Site office/control room building • Electrical connection between the battery modules and transformers within the BESS footprint • Installation of a connection to the Port Lincoln Substation and the electricity transmission network.
Development Number	N/A
Development/Property Name	Port Lincoln Battery Energy Storage System (BESS)
Location	Lot 506 Flinders Highway, Duck Ponds – approximately 6 km north-west of Port Augusta
Owner	Flow Power Pty Ltd
Applicant	RPS Group

LEGISLATIVE FRAMEWORK

Instrument	*Hydrogen and Renewable Energy Act 2023 (HRE Act) and Hydrogen and Renewable Energy Regulations 2024 (HRE Regulations)*
Overlay	Hazards (Bushfire – General) Overlay
Fire Authority/ Response Area	South Australian Country Fire Service/Lincoln Response Area

DECISION/SUMMARY

The South Australian Country Fire Service (SACFS) welcomes and supports development in regional and rural areas of South Australia.

This advice/comment is relevant to the following documents:

- Environmental Impact Report dated January 2026
- Statement of Environmental Objectives dated January 2026
- Concept Layout dated 15 August 2025

An officer of the SACFS has undertaken a review of the aforementioned document(s) provided on the Plan SA portal, for the planning application.

SACFS has regard for the bushfire hazard(s) to and from the site, and any mitigation measures required to prevent spread of fire to the site, or the environment as a result of the activities within the site. SACFS provides the following comments:

Bushfire Hazard Overlay

The site is located within the areas designated:

- Hazards (Bushfire – General) Overlay

The Desired Outcomes (DO) for the Hazards (Bushfire – General) Overlay identifies:

DO 1 Development, including land division responds to the general level of bushfire risk by siting and designing buildings in a manner that mitigates the threat and impact of bushfires on life and property taking into account the increased frequency and intensity of bushfires as a result of climate change.

DO 2 To facilitate access for emergency service vehicles to aid the protection of lives and assets from bushfire danger.

Fire Response Capability

The site is within the Lincoln fire station (CFS) Response Area.

Land Use

Performance outcomes for Land Use do not apply in this hazard overlay.

Siting

The SACFS recommends establishing and maintaining an Asset Protection Zone (APZ) to create a setback/buffer to any infrastructure using mineral earth breaks, roadways and/or areas of managed vegetation to prevent or prohibit the spread of bushfires to and from the site, minimising the risk to life, and or damage to buildings and property and maintain a fuel reduced zone for safe movement of occupants and firefighters.

SACFS notes the current proposal does not meet this requirement.

SACFS recommends all buildings and infrastructure such as Substation, Inverter stations, BESS and Control Buildings or other similar assets, should be located away from the property boundaries/site boundary perimeter fence or existing vegetation being retained, for the purposes of maintaining an APZ and to achieve a maximum exposure of no more than BAL 12.5 kW/m2*, in line with the separation distances provided below.

Table 1: Separation Distances

Infrastructure	Elevation	Classified Vegetation	Effective Slope	Separation Distance
Substation, Temporary Laydown and BESS Project Areas	North, East, South	Grassland	Upslope and flat land (0 degrees)	17m
	West	Grassland	Downslope >0 to 5 degrees	20m

See Access/Egress and Vegetation Management recommendations for more detail.

Access/Egress

Any future internal road networks should be designed to achieve compliance with the 'Roads' Performance Outcome relevant to the hazard overlay.

SACFS notes the proposal does not include roads of adequate design to satisfy the desired outcomes of this hazard overlay.

Perimeter roads with a minimum formed road width of 6 metres should be incorporated to achieve adequate separation between infrastructure and areas of bushfire hazard to support safer access for the purposes of fire fighting or provide mineral earth breaks for passive protection from spread of fire to and from the site.

All access/egress roads on the project site:

- Perimeter roads shall be incorporated to achieve adequate separation between infrastructure and areas of bushfire hazard including areas of remnant vegetation being retained within the boundaries of the allotments to support safer access for the purposes of fire fighting or provide mineral earth breaks for passive protection from spread of fire to and from the site.
- Shall include two (2) separate and safe exit points located on opposite ends of the road to enable multiple avenues of evacuation in the event of a bushfire.
- Shall be constructed with a formed, compacted, self-draining, all-weather surface.
- Roads shall have a minimum formed road width of 6 meters, or if constructed less than 6 metres wide, access shall include appropriately sized passing bays or turning areas, spaced no more than 200 meters apart to support safer access for the purposes of fire fighting:
    - Passing bays minimum width of 6 metres and length of 17 metres, or
    - 'T' or 'Y' shaped turning area with a minimum formed length of 11 metres and minimum internal radii of 9.5 metres.
- Incorporating cul-de-sac endings or dead end roads has either:
    - A turning area with a minimum formed surface radius of 12.5m, or
    - 'T' or 'Y' shaped turning area with a minimum formed length of 11 metres and minimum internal radii of 9.5 metres.
- Shall be constructed with a minimum external radius of 12.5m for all road curves.
- Shall not exceed a gradient of 16 degrees (29%).
- Shall incorporate solid all-weather crossings over any water-course capable of supporting fire-fighting vehicles with a gross vehicle mass (GVM) of 21 tonnes.
- Vegetation overhanging the access road shall be pruned to achieve a minimum vehicular clearance of not less than 4 metres width and a vertical height clearance of 4 metres.
- Shall allow fire-fighting vehicles to safely enter and exit the site in a forward direction by incorporating a loop road around the site.
- All access gates to be readily accessible to attending fire service units, this may be with the use of a Lockwood 003 type padlocks in accordance with AS4428.17.

Note: Other fire safety measures pertaining to roads may be prescribed by the National Construction Code.

Vegetation Management (buildings and infrastructure such as Substation, Inverter stations, BESS, and Control Buildings):

- Vegetation management shall be established and maintained as per the separation distances provided in Table 1 of each Substation/Control Building/BESS or other similar assets as follows:
    - The understorey plants within the Asset Protection Zone (APZ) shall be maintained such that when considered overall a maximum coverage of 30% is attained, and so that the leaf area of shrubs is not continuous.
    - No understorey vegetation shall be established within 10m of the Substation/Control Building site (Understorey is defined as plants and bushes up to 2m in height).
    - Grasses within the zone shall be reduced to a maximum height of 10cm during the fire danger season (e.g. by grazing, slashing or chemical treatment)
    - The APZ shall be maintained to prevent the accumulation of dead vegetation during the fire danger season.
- A single row of trees and/or shrubs are permitted for screening purposes, in accordance with the below:
    - Located no less than 10 metres from all infrastructure and not connected to other hazardous vegetation.
    - Located no less than 10 metres from the access road.
    - Shrubs shall not be planted under trees. Species, with a single stem habit are preferred, with the lower limbs removed to prevent them connecting with grassy understorey.
    - Screening plants should have low flammability characteristics, be kept in optimum health, pruned regularly and any dead vegetation removed.

Water Supply

Whilst there is presence of reticulated water in the area reticulated water supplies may be compromised during a bushfire event. Static fire water tanks for both bushfire, BESS and building fires will be required to assist in effective Fire Service intervention and suppression.

SACFS notes the current proposal does not meet this requirement.

Fire water tank (72,000L) to be made available to SA Fire Service Policy 14 requirements and include both large and small-bore suction outlets as per the policy and as follows:

- Access to the fire water tank shall be constructed of all-weather construction, with a minimum formed road surface width of 6 metres.
- Located at the main entrance to the site. If unable to achieve this, then clear signage is to be provided to clearly and quickly identify the location of the fire water tank/s.
- Fire water tanks shall be identified with signage in accordance with AS 2419.1.
- Provision shall be made adjacent the fire water tank for a nominally level hardstand area (capable of supporting fire-fighting vehicles with a gross vehicle mass (GVM) of 21 tonnes) that is a distance equal to or less than 5 metres from the water supply outlet.
- The fire water tank is required to be available to all BESS system pod/containers within 90 metres of hose lay of the static fire water tank. If this cannot be achieved, then additional static fire water tanks or a dry hydrant system may be required.

Emergency Response Planning

The Bushfire Management Plan and the Emergency Management Plan will need to be established and reviewed and updated every 12 months by the company and/or its operators. Revised versions to be forwarded to the relevant SACFS Regional Office to use as a reference. The safety of first responders must be a priority, and emergency response plans should not require firefighters to open or enter the BESS compartment at any time.

The SACFS requires the company and/or its operators to remotely monitor the installed systems and be able to remotely shut down any live systems. In addition, a representative of the company and/or its operator is to be on site within 60 minutes of the 000 call for fire service attendance.

During the construction and decommissioning phases and whilst undertaking maintenance, proponents should provide the provision of basic fire-firefighting equipment at each site, including fire extinguishers, knapsacks, and other equipment suitable for initial response actions.

The company and/or its operators will be required to engage with the Regional SACFS representative on a regular basis, regarding on-site training and site inductions for emergency service personnel.

MANIFEST BOX (or similar)

Given the complexities that the subject site presents, SACFS further recommends the installation of a Manifest Box at the main entrance of the site. This box (which looks a bit like a small meter box), should be red with white writing 'Fire Protection system' or similar, and clearly visible to fire crews as they access the site. Information contained should include, but is not limited to, a list of emergency contact phone numbers and a site plan highlighting vehicle access, turning ability, buildings and infrastructure locations, fire water i.e., fill locations, all fire protection equipment, and any on-site hazards or storage of dangerous materials i.e., LPG, fuels or chemicals. Access to the Manifest Box, if locked, must be readily accessible using a Lockwood 003-type padlock, in accordance with AS 4428.17.

BUILDING CONSIDERATIONS and BESS:

All class 2 – 9 buildings will need to comply with National Construction Code (NCC) and to include all the minimum *Deemed to satisfy* fire and life safety provisions.

Additional notes for Energy facilities or BESS:

- Access and working clearances for large emergency service vehicles to the "Electrical Transmission Area/control room area" needs to be incorporated. This includes a reasonable clear and safe working environment.
- Servicing of the detection and suppression system (if installed) within the racks will be maintained to the manufacture's and to SA Ministerial Building Standard MBS 002 "Maintaining the performance of essential safety provisions" requirements and recorded.
- The SACFS will not accept BESS container fire detection system monitoring requests unless required by the NCC.
- If a battery rack is required to be open at any time (including an emergency event), this will be done by the Company and/or its operator's staff and not the Fire Authority.
- Developers and operators should have regard for the Australasian Fire and Emergency Services Authorities Council. (2025) Large-scale battery energy storage system installations (AFAC Publication No. 3105), AFAC, Melbourne, Australia Council 2025.

SACFS, as the referral agency, reserves the right to request additional information and provide further comment, under the Planning Development and Infrastructure Act and Regulations, in particular, but not limited to Regulation 45 (3) during the Building Rules approval process.

Prepared By:	Signature:	Date:
[redacted] **Manager DAS**		25/03/2026

Government of South Australia
Department for Environment and Water

DEW-D0034535

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[redacted]
A/Manager, Environmental Regulation
Department for Energy and Mining
GPO Box 618
ADELAIDE SA 5001

By email: DEM.EnergyRegulation@sa.gov.au

Dear [redacted]

Project:	Port Lincoln Battery Energy Storage System (BESS)
Application:	Associated Infrastructure Licence (AIL) under the HRE Act
Applicant:	Utilacor Pty Ltd (a subsidiary of Flow Power Pty Ltd)
Location:	Lot 506 Flinders Highway, Duck Ponds, South Australia 5607 CT 6255/1426, DP 57355, A506 Approximately 6 km north-west of Port Lincoln in the Eyre Peninsula Region

Thank you for your email dated 16 February 2026 inviting the Department for Environment and Water (DEW) to comment on the application from Utilacor Pty Ltd for an Associated Infrastructure Licence (AIL) under the *Hydrogen and Renewable Energy Act 2023* (HRE Act) for the Port Lincoln Battery Energy Storage System (BESS) project.

DEW has reviewed the applicant's draft Environmental Impact Report and Statement of Environmental Objectives and associated documentation supporting the proposed AIL to construct, operate and decommission the Port Lincoln BESS. Comments on the potential impact of the project on matters within DEW's area of responsibility pursuant to section 73 and regulation 40 of the HRE Act and Regulations are provided in Attachment A.

In summary, DEW does not have any major concerns with this proposal and has considered the following matters, providing detailed comments in the attached submission (Attachment A):

- The project site is predominantly cleared vacant land, historically used for sheep and cattle grazing with limited native vegetation and no native vegetation clearance is anticipated.
- There is a low likelihood of State listed fauna species being present on the site however, several State species of conservation significance have been recorded within a 5-kilometre radius that should be further addressed in the documentation.
- Environmental objectives need to be amended or updated to include adequate assessment criteria and leading performance criteria for native fauna, non-Aboriginal heritage and climate change.

- Additional detail is required to ensure that management of native fauna on the site complies with the *National Parks and Wildlife Act 1972* requirements.
- There are two first order ephemeral flow path features on the project site which flow northwest toward a significant water body named Little Swamp (600 m away).
- The project site is located within the Southern Basins Prescribed Wells Areas although the applicant has indicated that no underground water will be extracted for this proposal.
- There is low risk for encountering archaeological features of potential significance on the project site and it is supported that additional detail is added to ensure measures are in place to protect any potential heritage values found during any stage of the project's 20 year life span.

Comments are provided to assist the Minister for Energy and Mining with the environmental assessment of this application and DEW officers are available if you have any questions or require further clarification or advice regarding these comments.

For further information regarding this matter, please contact [redacted], Director Planning and Heritage, DEW on [redacted] or on [redacted].

Yours sincerely

[redacted]

ACTING CHIEF EXECUTIVE

23/04/2026

Government of South Australia
Department for Environment and Water

Attachment A – Department for Environment and Water submission – Port Lincoln Battery Energy Storage System (DEW-D0034535)

Documentation for Review: Draft Environmental Impact Report and Statement of Environmental Objectives for the Port Lincoln BESS Project

Relating to the Application for: Associated Infrastructure Licence (AIL) under the *Hydrogen and Renewable Energy Act 2023* (HRE Act)

Project Name: Port Lincoln Battery Energy Storage System (BESS)
Application: Associated Infrastructure Licence (AIL) - proposal for the Port Lincoln BESS and associated infrastructure.
Applicant: Utilacor Pty Ltd (a subsidiary of Flow Power Pty Ltd)(the applicant)
Location: Lot 506 Flinders Highway, Duck Ponds, South Australia 5607, CT 6255/426, DP 57355 A506
Approximately 10km north-west of Port Lincoln
Project Area: The Project Area is proposed to be sited across one parcel of land totalling approximately 24.5 hectares (ha) in area (EIR states 26.4 ha), with a development footprint of 1.5 ha.
The land is freehold, vacant land situated adjacent to the Port Lincoln substation which the BESS is proposed to be connected to.
The Project Area is mostly cleared pasture historically used for sheep and cattle grazing, in the Rural zone and within the Lower Eyre District Council Local Government Area and the Eyre Peninsula Landscape Management Region.

The Department for Energy and Mining (DEM) is the State Agency responsible for administering the *Hydrogen and Renewable Energy Act 2023* (HRE Act) and applications for an Associated Infrastructure Licence (AIL).

Utilacor Pty Ltd (the applicant) has applied to DEM for an AIL for consideration under the HRE Act for the Port Lincoln BESS and as part of this application process has provided a draft Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) for consideration.

Under the new HRE legislation the 'administrative unit of the Public Service, under a Minister, responsible for the administration of a prescribed Act' is considered a prescribed body, which means that applications for licences will be referred to the Department for Environment and Water (DEW) for review and comment on matters relevant to the legislation DEW administers. The relevant prescribed Acts administered by DEW related to this project are:

- *National Parks and Wildlife Act 1972* (NPW Act)
- *Landscape South Australia Act 2019* (Landscape Act)
- *Heritage Places Act 1993* (HP Act)

DEM has referred this matter to DEW as a prescribed body under the HRE Act and has requested that DEW provide comment on the draft EIR and SEO, under section 73 and Regulation 40 of the HRE Act and regulations, and in doing so consider the following questions:

1. has the applicant adequately described the existing environment, as far as this is relevant to the proposed operations?
2. has the applicant adequately identified the potential impacts on the environment that may arise from the proposed operations?
3. are the proposed environmental objectives acceptable?
4. are the proposed mitigation measures practical and likely to achieve the desired objectives?
5. are the proposed assessment criteria suitable to demonstrate achievement of the proposed objectives?

Attachment A – Department for Environment and Water submission – Port Lincoln BESS (DEW-D0034535)

Report Reference / DEM questions / Value	Topic / Comments
Existing Environment	**Has the applicant adequately described the existing environment, as far as this is relevant to the proposed operations?** The Department for Environment and Water (DEW) notes and recommends the following: <u>Biodiversity</u> • the existing environment and biodiversity values have been sufficiently identified in the desktop assessment, noting a site assessment was carried out on 4 June 2025 to identify native vegetation in accordance with the NV Act and habitat suitable for threatened biota listed under both NPW Act and the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). <u>Native Fauna</u> • The applicants assessment is correct which identified that no native fauna listed under the NPW Act was likely to be present on the proposed project site and unlikely to occur due to lack of habitat although there may be bird or bat presence that needs to be addressed in terms on native fauna management (see further details under Mitigation Measures and Assessment Criteria headings below). • There are a number of known records of several NPW and EPBC listed species within 5km and within 500m, some of which relate to the proximity to a waterbody (Little Swamp) north-east of the proposed project site, including the known regionally critical Yellow-tailed Black Cockatoos (NPW Act listed as Vulnerable). Whilst indirect impact risk for bird and bat species is low, DEW advises that the EIR and SEO need to include measures to ensure that potential impact event of fauna disturbance via pathway vehicle movement etc are mitigated by driver induction and reporting sightings with a low level of risk (see details in sections below). <u>Water Resources</u> <u>Groundwater</u> • The project site is partially located within the Southern Basins Prescribed Wells Area (SB PWA) (the larger eastern portion of the land) where any dewatering of underground water from trenches or excavations within the SB PWA requires an authorisation or allocation. The boundaries of the SB PWA can be found in a detailed map on DEW's WaterConnect site here: https://www.waterconnect.sa.gov.au/Pages/Advanced-Map-Search.aspx • It is noted that a well unit number 6028-02373 (borehole) drilled in 2002 is located on the project site and identified for stock use. • If the project requires underground water for consumptive use (including dust suppression, cooling, construction or any other purpose other than stock and domestic purposes, fire-fighting and public-access road making) then a water allocation is required pursuant to the *Landscape South Australia Act 2019* (Landscape Act). Please contact the DEW Water Licensing Branch on (08) 372 7561 or at dew.mywater@sa.gov.au for advice regarding matters concerning underground water authorisation or allocations including any usage for worker facilities and potable use.

	• Any use of underground water for construction or concrete batching from groundwater sources needs to be assessed by DEW as to whether a well construction permit and authorisation to take water is required, this is also required to be included in the EIR. • The applicant has addressed details reflecting the location of the project site being within the SB PWA and groundwater requirements under the Landscape Act and that there is no expected use or impact on groundwater from this proposed development (EIR pg 29). • Any potential impacts to groundwater will need to be taken into account in the EIR and SEO. <u>Surface Water / Watercourses</u> • There are no watercourses located on the project site although there is a nearby waterbody (Little Swamp), impacts to which will need to be addressed in the EIR and SEO (see details in sections below). <u>Flood</u> • The applicant has identified the flood risk to be very low after considering the site topography, relative slope and onsite observations. Comments related to assessment and mitigation as detailed in sections below. <u>Heritage – Non-Aboriginal</u> • The applicants assessment is correct regarding no known heritage impacts on the proposed project site or within close proximity. Due to this, DEW considers there is a low risk of the project encountering archaeological features of potential significance although DEW recommends measures to protect any potential heritage values found during any stage of the project's 20 year life (see details in sections below). <u>Native Vegetation</u> *Note: The Native Vegetation Council assess native vegetation clearance matters. This is not a matter for DEW.*
Potential Impacts	**Has the applicant adequately identified the potential impacts on the environment that may arise from the proposed operations?** DEW notes and recommends the following: <u>Native Fauna</u> • The applicant has correctly identified native fauna and most impacts, although despite there being no recorded presence of NPW listed native fauna onsite, native fauna may access the site where these potential impacts need to be adequately addressed to include the management of native fauna and mitigation of risks. This is especially required due to the multiple NPW endangered and vulnerable species present within 5 km including bird and bat populations that may access the site or be at risk of injury due to collisions with vehicles or entanglement with fencing. • **Fencing** ○ In recent years, high-security fencing, in areas nearby to the project site, has inadvertently caused entanglement and mortality of Grey-headed Flying Foxes (GHFF; NPW Act listed as Rare and EPBC Act listed as Vulnerable), particularly where high-tensile wires are used.

- While GHFF are not currently established in the southern Eyre Peninsula, intermittent population movements have been recorded in recent years. Observations, including reports from citizen scientists, indicate that this species is moving through the Little Swamp catchment.
- GHFF presence is an emerging consideration across South Australia, with infrastructure providers such as SA Power Networks increasingly required to plan for and mitigate associated risks.
- While impacts vary by infrastructure type, this species warrants consideration within the proponent's design and risk management framework.

- **Lighting**
  - There are already substantive lighting treatments on the adjoining Port Lincoln substation and prison complex (as raised in the Visual Impact Assessment report, page 28). The proposed development has committed to the application of *AS 4282:1997 – Control of the Obtrusive Effects of Outdoor Lighting* (refer EIR Section 5.0, p.50 and associated technical reports), together with planned vegetative buffering to mitigate visual and amenity impacts.
  - Notwithstanding these measures, DEW notes that the Little Swamp wetland, located within approximately 2km of the proposed site, is utilised by NPW Act listed birds and EPBC listed migratory shorebirds, including two species identified within the EPBC Matters of National Environmental Significance (MNES) table. Given the existing and anticipated cumulative light environment, consideration should be given to minimising light spill and skyglow during the operational phase.
  - Artificial lighting is a recognised pressure for migratory shorebirds, particularly in relation to disorientation, altered foraging behaviour, and disturbance of roosting patterns. The Common Greenshank (*Tringa nebularia*; EPBC *Endangered*), recorded within the broader locality, is known to rely on both diurnal and nocturnal foraging within shallow waters and mudflats to meet energetic requirements. Increased light pollution may contribute to habitat degradation for this species.
  - Similarly, the Sharp-tailed Sandpiper (*Calidris acuminata*; EPBC *Vulnerable*) is sensitive to artificial lighting, which can interfere with foraging efficiency, rest during migration, and the use of preferred dark roost sites. Management of operational lighting will therefore be important to minimise potential cumulative impacts on migratory shorebird values associated with the Little Swamp wetland system.

- During each stage of the proposed development and any investigations or assessments on the project site, should the applicant need to catch, move, relocate or destroy any protected animal or eggs, the applicant is required to apply for a permit under South Australian legislation to DEW. Further information can be obtained at DEW's website to apply for a permit to capture, release or destroy wildlife at:
  https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/capture-release
  https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/destroy

Water Resources

- The applicant has described in the EIR that no native water resources will be utilised for this project and there are no impacts expected.

	• As described above, should the project require underground water, for concrete batching for example, or any other uses, a well construction permit may be required pursuant to the *Landscape South Australia Act 2019* (Landscape Act). Please contact the DEW Water Licensing Branch on (08) 8372 7561 for advice regarding matters concerning underground water authorisations (see more contact details in below section), this is also required to be included in the EIR. <u>Heritage - Non-Aboriginal</u> • As described in above section, DEW considers there is a low risk of the project encountering archaeological features of potential significance. Despite the risk being considered low for encountering archaeological features of potential significance, DEW advises that the EIR and SEO need to include measures to ensure that, any historical archaeological feature uncovered during any stage of the project is protected and managed in accordance with the *Heritage Places Act 1993*. Further to this, any activities authorised under the *Hydrogen and Renewable Energy Act 2023* must not contravene the requirements of the *Heritage Places Act 1993*. • DEW notes that the EIR, Appendices A.5 "Desktop Heritage Assessment" recognises legal obligations and puts forward heritage management options (Appendices A.5, Pg 3). DEW was pleased to see these detailed inclusions and further recommends that all management plans are updated to include the following risk mitigation strategies for historical archaeology: o Completion of supporting heritage impact assessment o Development of a CEMP and OMP with project specific management and mitigation measures to include: ▪ All workers to undergo site inductions for historical archaeology ▪ Implementation of an unexpected historical archaeology discovery procedure (stop work, engage archaeologist to assess significance of the find, and recommence work only once authorisation received from the archaeologist) ▪ Immediate reporting to DEW if a site/object of heritage significance is disturbed without appropriate permit/approval ▪ Reporting to DEW of any other event where unknown historical heritage is discovered. <u>Native Vegetation</u> *Note: The Native Vegetation Council assess native vegetation clearance matters. This is not a matter for DEW.* • The EIR states that no native vegetation clearance issues are anticipated.
Environmental Objectives	**Are the proposed environmental objectives acceptable?** DEW notes and recommends the following: • The SEO does have sufficient environmental objectives or describe the objectives adequately in Table 2 "Environmental Objectives and Assessment Criteria" (SEO pp. 4-13). • The following objectives need to be added or amended related to prescribed acts under DEW's administration and adequately complete the corresponding assessment criteria, leading performance criteria and control measures:

	○ No clearance of native vegetation or disturbance to native fauna unless prior approval under the relevant legislation is obtained ○ Minimise greenhouse gas emissions during construction, operation, decommissioning and rehabilitation phases ○ No damage, disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and places unless authorised under the relevant legislation • The SEO has an appropriate immediately reportable incident related to adverse impacts on biodiversity.
Mitigation Measures	**Are the proposed mitigation measures practical and likely to achieve the desired objectives?** Further to details described above under **Potential Impacts,** DEW recommends and notes the following: <u>Native Fauna</u> • Impacts and mitigation measures on native fauna need to be adequately addressed to include the management of native fauna, including potential risk of injury due to factors such as collisions with vehicles or any entanglement in fencing or other infrastructure. • DEW recommendations regarding permits required to catch, move, relocate or destroy any protected animal or eggs need to be incorporated in the mitigation measures and withing relevant management plans during each stage of the proposed development and any investigations or assessments on the project site. Further, to manage situations where there is injury to native fauna, management plans need to incorporate relevant assessments and procedures. • **Fencing** – as described earlier in this submission: ○ In recent years, high-security fencing, in areas nearby to the project site, has inadvertently caused entanglement and mortality of Grey-headed Flying Foxes (GHFF; NPW Act listed as Rare and EPBC Act listed as Vulnerable) particularly where high-tensile wires are used. ○ While impacts vary by infrastructure type, this species warrants consideration within the proponent's design and risk management framework. • **Lighting** – as described earlier in this submission: ○ Given the existing and anticipated cumulative light environment, consideration should be given to minimising light spill and skyglow during the operational phase. ○ Management of operational lighting will therefore be important to minimise potential cumulative impacts on migratory shorebird values associated with the Little Swamp wetland system. <u>Flood</u> • Whilst the flood risk has been identified as very low by the applicant, DEW advises that for any flood risk the applicant needs to check whether the current flood hazards overlay reflects the latest available flood studies and understanding of future flood risk under recently revised climate change projections. • Assessment of impacts under 1 % AEP only is unlikely to be sufficient in light of future climate change. In the case of a flood risk assessment being undertaken for the site (and access to and from the site) this assessment must use an up-to-date flood

	study that considers current and future flood risk in line with national guidance under Australian Rainfall and Runoff, including climate change scenarios. Climate Change • The project needs to ensure that whole of life GHG emissions of the project are minimised as much as practicable irrespective of the project leading to renewable electricity generation and thus contributing to minimising greenhouse GHG emissions from the electricity sector. • GHG emissions needs to be minimised from construction, operation and decommissioning activities. This should include selection and use of materials and products with reduced embodied emissions including the use of alternative materials and technologies (e.g. green concrete, BESS with lower carbon footprint e.g. via battery chemistry, recycled content, improved manufacturing) and materials with high recycled content (steel, copper, road base etc). • The project needs to implement waste management approaches that consider minimising material quantities in the design and that maximise the recycling and re-use of demolition materials. Equipment selection should include consideration of recycling and reuse at end of life. • The project needs to undertake an assessment of climate change related risks for the duration of its life including impacts of severe weather (e.g. heatwaves and storm events) and identify measures to minimise these impacts. This should include managing the impacts of flooding, bushfires and extreme wind gusts on the ongoing operation of the installation. • Details described above need be addressed in the EIR and SEO in relation to mitigation measures and assessment criteria. For the following topics, please refer to details in other sections for consideration to update the EIR and SEO • Heritage – Non-Aboriginal – please refer to section above. • Water Resources / Flood

Assessment Criteria	**Are the proposed assessment criteria suitable to demonstrate achievement of the proposed objectives?**
	
	As recommended above in the Environmental Objectives section and Mitigation Measures sections above, DEW recommends updating the SEO and EIR to include the environmental objectives and ensure the associated risk assessment criteria, leading performance criteria and control and management strategies are then adequately addressed in line with this.
	
	Native Fauna
	• DEW recommends to including "Applicable Non-Legislated Standards" and include the following codes of practice for humane destruction of wildlife where relevant for any injured native animal on site which is located at: https://www.environment.sa.gov.au/topics/animals-and-plants/animal-welfare/codes-of-practice/codes-of-practice-humane-destruction-wildlife
	  ○ Native Birds - https://cdn.environment.sa.gov.au/environment/docs/cop_humanedestructionbirds.pdf
	  ○ Wombats – https://cdn.environment.sa.gov.au/environment/docs/cop-wombat-2018.pdf
	  ○ Common brushtail possum – https://cdn.environment.sa.gov.au/environment/docs/cop_possum.pdf
	  ○ Flocking birds - https://cdn.environment.sa.gov.au/environment/docs/cop_flockingbirds.pdf

	○ Kangaroos and Wallabies – https://cdn.environment.sa.gov.au/environment/docs/code-of-practice-kangaroos-wallabies-non-commercial.pdf The *Animal Welfare Act 1985* can be referred to if there is not a relevant code on DEW's website and additionally advice for management of wildlife can be referred to within Table 5.2 with a link to the DEW's website advice located at https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife and species specific information on the native fauna including: Grey-headed flying foxes - https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/grey-headed-flying-foxes Snakes – https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/snakes Possums – https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/possums Wombats - https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/wombats Little Corellas - https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/little-corellas Climate Change • As described in the Potential Impacts section above, the EIR and SEO need to address both mitigation measures and assessment criteria duration of its life including GHG emissions and climate change risks such as managing the impacts of flooding, bushfires and extreme wind gusts on the ongoing operation of the installation. For the following topics, please refer to details in other sections for consideration to update the EIR and SEO • Heritage – Non-Aboriginal – please refer to section above. • Water Resources
	Contact details
Contact details	**Department for Environment and Water** **Planning and Assessment Team** Contact: [redacted], Coordinator Assessments Email: DEWPlanningandAssessment@sa.gov.au **Water Licensing and Well Permits** Contact: Water Licensing Branch Email: dew.mywater@sa.gov.au Website: https://www.environment.sa.gov.au/licences-and-permits/water-licence-and-permit-forms/eyre-peninsula Phone: (08) 8372 7561, option 2
Contact details	**Native Vegetation**

	For any clearance of native vegetation that is associated with this project, approval will need to be sought from the Native Vegetation Council (NVC) in accordance with the *Native Vegetation Act 1991*, and its regulations. The Native Vegetation Branch within DEW supports the NCV. For native vegetation clearance application information, the contact details are below. Contact: Native Vegetation Branch Native Vegetation & Pastoral Management Division Department for Environment and Water Email: DEWNVC@sa.gov.au Phone No: (08) 8303 9777

Hi [redacted]

I refer to the proposed Port Lincoln Battery Energy Storage System, (BESS), by Flow Power Pty Ltd. Located at Lot 506 Flinders Highway, Duck Ponds, approximately 6km north-west of Port Lincoln.

Thank you for your email dated 16 February 2026 requesting comment under Sections 73(2)&(4) of the Hydrogen and Renewable Energy Act 2023, (the Act) in relation to Flow Power Pty Ltd application for an Associated Infrastructure Licence (AIL) to undertake the construction and operation of the Port Lincoln Battery Energy Storage System (BESS). The (BESS) is proposed to facilitate 150 megawatts (MW)/600 megawatt-hours (MWh) of energy storage.

The Crown and Impact Assessment Team, Department for Housing and Urban Development (DHUD), has reviewed the Statement of Environmental Objectives (SEO) and Environmental Impact Report (EIR).

The following comments and recommendations are made in DHUD's capacity as the administrative unit responsible for the administration of the *Planning, Development and Infrastructure Act 2016,* and a prescribed body pursuant to regulation 40 of the *Hydrogen and Renewable Regulations 2024*.

Criteria	**Advice**
Land Use	The subject site is located within the Rural Zone of the Planning and Design Code. The Zone envisions uses that support, '*the economic prosperity of South Australia primarily through the production, processing, storage and distribution of primary produce, forestry and the generation of energy from renewable sources*.' DO1. The zone also seeks that, '*The productive value of rural land for a range of primary production activities and associated value adding, processing, warehousing and distribution is supported, protected and maintained*.' PO1.1. A *Renewable Energy Facility* is listed as an envisaged form of development intended for the zone. The subject site is a rural property, approximately 26.4-hectares, with the BESS development located in a small irregular area in the western portion. The site is a freehold property that is currently vacant. The BESS is intended to connect into the Port Lincoln Substation and electricity

	transmission network, to the site's immediate north. The life span of the project is 20 years. Recommendations • If a licence is granted, condition(s) relating to decommissioning should be included, to facilitate the removal of infrastructure and return of impacted land to predevelopment condition.
Planning & Design Code	The application has been accompanied with an Environmental Impact Report (EIR) which includes a planning and land use assessment. **<u>Setbacks and Visual Impacts</u>** General Development Policies, *Interface between Land Uses,* seeks, *Development is located and designed to mitigate adverse effects on or from neighbouring and proximate land uses*, DO1 Recommendations • A condition ensuring ongoing maintenance and management of the proposed vegetation screening is included, particularly around its initial planting and establishment. Consideration to additional screening further around the BESS. **<u>Bushfire Risk</u>** The EIR includes a detailed Fire Safety assessment and incorporation of several fire suppressant or mitigation measures to reduce the impact of a fire either on or from the BESS. Recommendations • NA **<u>Aboriginal and non-aboriginal heritage</u>** Noted site is within the Native Title Claims of the local Barngarla People for the project site. Preliminary investigations noted an absence of recorded Aboriginal or non-Aboriginal heritage places within the site area. Recommendations

	• Further consultation with local Barngarla People or their representatives to obtain relevant further information that may pertain to the site. • The inclusion of advisory note/s/ ensuring an adequate Heritage Plan and measures included to ensure if heritage items and or artefacts are identified on site there is an appropriate plan in place. In accordance with the Aboriginal Heritage Act 1988 and The Heritage Places Act 1993. **<u>Surface Water and Flooding</u>** Several key stormwater design elements included in the BESS proposal. Recommendations • The proposed design causes no increased stormwater runoff or diversion to areas outside of the site., with particular regard to the Little Swamp water body that appears lower than the subject site. **<u>Airport Building Heights (Regulated) Overlay</u>** As identified in the overlay the site is includes the Airport Building Heights (Regulated) Overlay. Generally, any development within this overlay requires a referral to the airport-operator for the relevant airport, (Port Lincoln Airport). Recommendations • The Environmental Impact Report notes the CEMP will liaise with the Civil Aviation Safety Authority. Recommended to discuss as soon as practical with the appropriate authority regarding the proposal to ensure appropriate feedback can be obtained prior to construction commencing.
Regional Plans	The subject site is within the Eyre and Western Regional Plan, January 2026. Within this plan Port Lincoln is identified as a Regional City. The plan identifies the region as having the opportunity 'to become a renewable energy powerhouse for South Australia, complementing its existing economic base.'

	The Regional Plan encourages and supports the provision of sustainable, renewable energy generation and storage options. Noting the regions issues relating to reliability, quality, and ageing infrastructure combined with the extent and area the network covers encourage multiple renewable energy options to be developed to address these concerns. *'The siting of any new large-scale renewable energy facility should avoid scenic landscapes and environmentally or culturally significant areas'*. The location of the proposal adjacent the Port Lincoln Substation is considered appropriate in keeping similar land uses clustered together and minimising the visual impact on areas that have no equivalent development. <u>Recommendations</u> Even though it is considered ideal to place complimentary land uses adjacent one another, further investigation into the incorporation of screening through vegetation plantings to prevent a mass of infrastructure dominating the landscape may be worth consideration, noting the sparsity of mature trees in the immediate vicinity.
State Planning Policies	The proposal directly relates to State Planning Policy 12 (Energy), that envisages, '*The provision of sustainable, reliable and affordable energy is essential in meeting the basic needs of communities and ensuring the long-term supply of key services across South Australia.*' Policies 12.1, 12.2, 12.3and 12.4 are worth key consideration. <u>Recommendations</u> NA
Previous Decisions	NA
Other matters	NA

[redacted]

Planning Officer, Crown and Impact Assessment, Planning and Land Use Services

Department for Housing and Urban Development

16 March 2026

In reply please quote #2026/00118, knet 24316960
Enquiries to [redacted] – dit.landusecoordination@sa.gov.au

Government of South Australia
Department for Infrastructure and Transport

TRANSPORT STRATEGY AND PLANNING DIVISION

GPO Box 1533
Adelaide SA 5001
DX 171

T 1300 872 677
W dit.sa.gov.au

ABN 92 366 288 135

Build. Move. Connect.

1 April 2026

[redacted]
Senior Environmental Compliance Officer
Department of Energy and Mining
GPO Box 618
ADELAIDE SA 5001
[redacted]

Dear [redacted]

RENEWABLE ENERGY INFRASTRUCTURE LICENCE

Application	Port Lincoln Battery Energy Storage System
Applicant	Flow Power Pty Ltd (trustee for Port Lincoln BESS Project Trust)
Location	Lot 506 Flinders Highway, Duck Ponds
Proposal	A Renewable Energy Infrastructure License (REIL) over approximately 26.4 ha to deliver an operational power output of 150MW/ 600 MWh of energy storage.

The above application has been referred to the Commissioner of Highways (CoH) in accordance with *Hydrogen and Renewable Energy Act 2023*, as the prescribed body listed in Part 6, Section 40 (2) of the *Hydrogen and Renewable Energy Act Regulations 2024*.

CONSIDERATION

The subject land is located 6 kms north-west of Port Lincoln with road frontage to Pound Lane that is under the control of the Lower Eyre Peninsula Council. Pound Lane intersects with Western Approach Road, which is an arterial road under the care, control and management of the CoH.

Western Approach Road is identified as a Primary Freight Route and Direct Tourist Route under the Department of Infrastructure and Transport's 'A Functional Hierarchy for South Australia's Land Transport Network'. This section of road carries approximately 1,900 vehicles per day (20.5% commercial vehicles) and has a speed limit of 110 km/h at the Ponds Lane Junction.

Traffic and Road Safety

The subject application seeks approval for the installation of a Battery Energy Storage System (BESS) with a proposed output capacity of 150 MW.

The Department has reviewed the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO), including the Traffic Impact Assessment (TIA) prepared by RPS Group (dated 19 August 2025). The TIA outlines that the project will generate temporary construction-phase traffic and minimal ongoing operational vehicle movements. Access to the site will be via Pound Lane, which connects to Western Approach Road and ultimately to Flinders Highway.

It is noted that during the construction phase, traffic volumes meet the warrants for Basic Auxiliary Left (BAL) and Basic Auxiliary Right (BAR) turn treatments at the Western Approach Road / Pound Road intersection. The assessment considered the performance of this intersection and concluded that it has adequate capacity, operates safely, and complies with the relevant design standards.

As part of the project, a Traffic Management Plan will be provided. It is noted that as part of this plan it is proposed to reduce the speed limit on Western Approach Road from 110 km/h to 80 km/h for the duration of construction (10 weeks).

The Department is generally supportive of the traffic assessment for the subject proposal and concurs with the recommendations.

ADVICE

The Department for Infrastructure and Transport supports the proposal subject to the following conditions:

1. Prior to construction, a 'Construction Traffic Management Plan (CTMP)', shall be prepared to the satisfaction of the Commissioner of Highways. The TMP shall address matters including, but not limited to the following:

   a) Traffic volumes, distributions, routes and types of vehicles to be used in the construction phase of the development.

   b) A Traffic Management Plan (TMP) for each phase of construction of the development, including any road and access changes and any proposed upgrades and/or closures. The TMP shall also show all traffic devices to be utilised (including variable message signs) and any proposed traffic restrictions. The applicant shall notify DIT's Traffic Management Centre (TMC) – Roadworks on 1800 434 058 or email dit.roadworks@sa.gov.au to gain approval for any road works, or the implementation of a traffic management plan during the construction phase. Before any construction works the contractor(s) shall complete a 'Notification of Works' form via the following link:

      https://www.dit.sa.gov.au/contractor_documents/works_on_roads_by_other_organisations

   c) Managing impacts to infrastructure within the road reserve.

   All vehicle movements shall be undertaken in accordance with the TMP.

2. All costs associated with the design and construction of any required arterial road upgrades/modifications required to facilitate the project (including, but not limited to, project management and any necessary road drainage upgrades, etc) shall be borne by the applicant.

   Note: The applicant shall contact DIT's Asset Manager – Zone 3, [redacted] or mobile [redacted] to obtain approval and discuss any technical issues regarding the required works. It should be noted that the applicant will need to enter into a Deed of Agreement with DIT for any road works on the arterial road network.

3. Any infrastructure within the road reserve that is demolished, altered, removed or damaged during the construction of the project shall be reinstated to the satisfaction of the relevant asset owner, with all costs being borne by the applicant.

The following note provides important information for the benefit of the applicant and is required to be included in any approval:

- As Restricted Access Vehicles (including oversize and over mass components) are proposed to be utilised, the applicant must ensure that all necessary approvals/permits are obtained from the National Heavy Vehicle Regulator (refer link: https://www.nhvr.gov.au).

Yours sincerely

[redacted]

MANAGER, TRANSPORT ASSESSMENT
for COMMISSIONER OF HIGHWAYS

From: [redacted] (EPA)

Sent: Monday, 16 March 2026 10:19 AM

To: [redacted] (DEM)

Cc: [redacted] (DEM); [redacted] (DEM); [redacted] (DEM)

Subject: RE: Advice around noise policy

OFFICIAL

Hi [redacted],

Thanks for the email.

Clause 11(2) of the Environment Protection (Commercial and Industrial Noise) Policy 2023 notes that the location of measurement for a noise assessment at a noise-affected premises should be "within or near, and at the same approximate elevation as, an area frequented by persons residing, working or sleeping at the premises…".

Clause 19(2)(b) required the assessments to be undertaken at "future premises … determined by the Authority to be premises that might be adversely affected by the noise source". The guidelines for the use of the noise policy notes that "this should only occur where … an approved development application exists for future dwellings…". It is noted that the land owner has an intention to subdivide the land, however, no approval has been granted yet.

If the location marked out in red currently doesn't have a clear purpose where someone might be working, sleeping, or regularly frequented, and no approved development application exist for new residential land uses, then the noise policy does not require an assessment at this location.

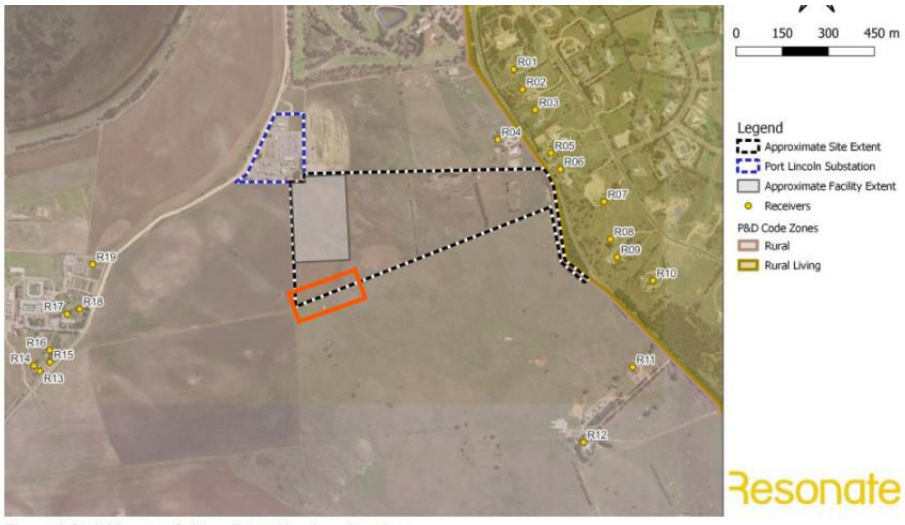


Figure 1 Aerial image of site, adjacent land, and zoning

Happy to chat further if you have any questions.

Cheers,

[redacted]

From: Landscape SA: EPLB Referrals

Sent: Thursday, 16 April 2026 9:11 AM

To: [redacted] (DEM); Landscape SA: EPLB Referrals

Cc: [redacted] (DEM); [redacted] (DEM)

Subject: RE: HRE Act referral - Request for comment: Pt Lincoln BESS EIR & SEO

Follow Up Flag: Follow up

Flag Status: Flagged

OFFICIAL

Hi [redacted],

The Eyre Peninsula Landscape Board (EPLB) has reviewed the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) submitted by Flow Power Pty Ltd in support of the Associated Infrastructure Licence application for the Port Lincoln Battery Energy Storage System, under the Hydrogen and Renewable Energy Act 2023.

EPLB is a prescribed body under the Act and has considered the proposal in relation to matters within the Board's responsibilities.

Based on the information provided, EPLB considers that:

- the existing environment has been adequately described for the purposes of the application;
- potential environmental impacts relevant to the Board's remit have been appropriately identified, and proposed mitigation measures are practical and likely to be effective;
- the proposed environmental objectives and assessment criteria are acceptable; and
- relevant legislation and guidance administered by this agency have been appropriately acknowledged.

Accordingly, EPLB has no objection to the granting of an Associated Infrastructure Licence for the Port Lincoln BESS, subject to the implementation of the proposed environmental management and mitigation measures outlined in the EIR and SEO.

Please contact me if further information is required.

Kind regards,

[redacted]
Manager, Planning & Engagement
Eyre Peninsula Landscape Board
P [redacted] | M [redacted]

From: [redacted]@lec.sa.gov.au>
Sent: Tuesday, 14 April 2026 9:57 AM
To: Lower Eyre Council – Development; [redacted] (DEM)
Cc: [redacted]
Subject: RE: HRE Act referral - Pt Lincoln BESS EIR & SEO comment

> You don't often get email from sacheenh@lec.sa.gov.au. Learn why this is important

Good morning [redacted]

Please note further to the below, I note that Council has no plans or intention to upgrade the road in the foreseeable future, either to make the full length bitumen or suitable for HML.

Kind Regards,

[redacted]
Acting Chief Executive Officer

Lower Eyre Council
PO Box 41 | Cummins SA | 5631
Ph: [redacted] | M: [redacted]
Email: [redacted]
Website: www.lowereyrepeninsula.sa.gov.au

"Working with our Rural and Coastal Communities"

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From: Lower Eyre Council – Development <development@lec.sa.gov.au>
Sent: Tuesday, 14 April 2026 9:52 AM
To: [redacted]@sa.gov.au

Cc: [redacted]@lec.sa.gov.au>; [redacted]@lec.sa.gov.au>
Subject: HRE Act referral - Pt Lincoln BESS EIR & SEO comment

Hi [redacted],

Please find below our submission from Lower Eyre Council.

In relation to the planning merits the site is located within the Rural Zone which envisages renewable energy facilities, provided they maintain the primary production activities. Based on the location and existing substation the proposed development would be considered an appropriate land use and site.

Based on the information provided as it relates to potential environmental impacts during the lifecycle of the facility we can provide the following comments:

1. The proposed development is located within an area that has identified pest weed (African Boxthorn) as per the ecological assessment undertaken by Eco Logical Australia. It is strongly encouraged appropriate measures and conditions are put in place to minimise the risk of spread, and appropriate clearance/treatment of the area be undertaken prior to construction commencing.

2. Understanding the facility creates an inherent fire risk, consideration should be given to appropriate facilities and infrastructure to help reduce the potential spread of any fire, e.g. firefighting equipment or fire-retardant chemicals stored on site. Council anticipates this information will be provided at a later stage as part of a Fire Management Plan during the Stage 3 of the licensing and approvals.

3. Access is proposed via Pound Road, which is a semi sealed road, confirmation of construction methodology should be considered to limit large vehicle access via this road. Alternatively upgrades to impacted roads should be undertaken to support development and construction.

   Confirmation should also be provided regarding access through existing free hold land, if there is an existing right of way established.

   There is no information on traffic type and volume for either construction or future servicing in the development submission. It can be accepted that Pound Lane is not fit for Restricted Access Vehicle (RAV) access other than infrequent occasional use under permit. The pavement condition would not support Higher Mass Limit (HML) use.

   The 2025 traffic counter returned 291 vehicles per day, up from the 244 mentioned in the submission. Council has no long-term intention of upgrading this road.

4. Acoustic report highlights 4m acoustic barriers and suggest spilt level benching. Confirmation should be provided to demonstrate spilt level benching will be incorporated to as per acoustic requirements. This earthworks design will also assist in limiting the impact of scaring to the land.

Based on the information provided and the context of the site it is not anticipated the proposed development will have a significant impact on the environment if the above items can be address appropriately.

Thankyou.

Kind Regards,

[redacted]
Development Administration Officer

Lower Eyre Council
PO Box 41 | Cummins SA | 5631
Ph: [redacted]
Email: [redacted]@lec.sa.gov.au
Website: www.lowereyrepeninsula.sa.gov.au

"Working with our Rural and Coastal Communities"



Flow Power Pty Ltd - Port Lincoln Battery Energy Storage System

Department of Primary Industries and Regions South Australia (PIRSA) feedback

General Comments
PIRSA notes the property has historically been used for livestock production, but the land is not currently used for that purpose, and the dwelling is vacant. Consideration for livestock biosecurity risks, including when accessing the site via the easement, should be made as the adjacent land may be used for livestock production in the future and as there is a mandated referral relating to the *Livestock Act 1997.*

Application ID	23210288
Created	26/03/2026 9:40 AM
Modified	26/03/2026 9:44 AM

Name	SH & ND Linsell
Organisation	
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR
Comments	Why is the installation of a Battery system (being the primary function of the land) not considered a 'change of land use'. Land in this area is rural and a battery system is not rural. Even on this website the consultation sits under "industry" and the land is not industrial.

Application ID	23210338
Created	26/03/2026 9:45 AM
Modified	26/03/2026 9:47 AM

Name	SH & ND Linsell
Organisation	
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Noise
Comments	The battery system will create an ongoing noise during any time that it is functioning - This noise is modelled to reach our home. Whilst the model indicates it will be within 'acceptable' levels, how is this measured ongoing given there is only 1db before it exceeds appropriate levels?

Application ID	23210359
Created	26/03/2026 9:47 AM
Modified	26/03/2026 9:49 AM

Name	SH & ND Linsell
Organisation	
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Noise
Comments	All noise predictions are based on modelling - what happens if once this is built, the modelling is wrong and the noise levels are higher than predicted?

Application ID	23214717
Created	26/03/2026 5:17 PM
Modified	26/03/2026 5:18 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Noise
Comments	Why is the noise levels only considered at our house and not at all points in our property? We have the right to enjoy the whole of our land and therefore not be impacted by the noise of the BESS.

Application ID	23214731
Created	26/03/2026 5:18 PM
Modified	26/03/2026 5:25 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Noise
Comments	we have concerns that the BESS will impact the noise levels throughout our property impacting any homes that may built in future developments. Our property has been considered for development for many years and this is a future option for us. The Premier has stated housing is a major issue for the state and this development will negatively on our ability to develop the land due to the noise impact

Application ID	23214783
Created	26/03/2026 5:26 PM
Modified	26/03/2026 5:28 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Noise
Comments	we have raised concerns with FLOW about the noise levels and they issued us with a copy of a site plan that shows a 4m high wall on the northern end of the facility which will reduce the noise levels to the Golf Course only. Why is the only consideration for golfers who are only impacted for a short period but nothing for those of us who live within the vicinity of the proposed project.

Application ID	23214756
Created	26/03/2026 5:21 PM
Modified	26/03/2026 5:30 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Noise
Comments	we run cattle and there is scientific evidence that rural animals can be impacted by ongoing noises which can impact their nurturing/milking of their young and in turn can impact their wellbeing. This will then impact our income from our cattle and therefore again disadvantaging us as landholders.

Application ID	23214808
Created	26/03/2026 5:30 PM
Modified	26/03/2026 5:37 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Noise
Comments	Has their been consultation with each inmate at the Port Lincoln Prison about the noise impacts this will have on them. The prison is considered their home and their wellbeing needs to be taken into account.

Application ID	23214791
Created	26/03/2026 5:28 PM
Modified	26/03/2026 5:41 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Noise
Comments	What is the process if the noise levels are breached? and how many times will a breach need to occur before the licence will be revoked? Should FLOW be fined for breaching the noise levels, will that fine be passed onto the landholders who are the ones impacted directly by that breach?

Application ID	23214854
Created	26/03/2026 5:41 PM
Modified	26/03/2026 5:46 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Noise
Comments	Who is measuring the noise levels and when? If FLOW are measuring their own noise levels, how can we be assured they are not altered to remain within the allowed decibels. Noise levels should be measured independently from FLOW via a calibrated system installed at neighbouring properties to measure the noise levels to show when this exceeds the licence.

Application ID	23214880
Created	26/03/2026 5:48 PM
Modified	26/03/2026 5:49 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Visual
Comments	We are concerned of the visual impact this BESS will have on our current outlook from our home - no options as yet have ameliorated these concerns

Application ID	23214839
Created	26/03/2026 5:38 PM
Modified	26/03/2026 5:51 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Visual
Comments	we have concerns that the BESS will visually impact from most of our property impacting any homes that may built in future developments. Our property has been considered for development for many years and this is a future option for us. The Premier has stated that housing is a major priority and this project will detrimentally impact this.

Application ID	23214898
Created	26/03/2026 5:52 PM
Modified	26/03/2026 5:53 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Visual
Comments	We have had discussions with FLOW regarding a green screen between the BESS and the outer lying areas of the property. We have noted a green screen will not cover the visual impact from higher up the hill, even if they install mounds to increase the height

Application ID	23214925
Created	26/03/2026 5:55 PM
Modified	26/03/2026 5:58 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Visual
Comments	any trees/shrubs will take 8-10 years to grow to a point they screen out the BESS. If FLOW water the trees in excess to increase the growth rate, the trees are likely to be weak and will fall over starting the process again. This does not therefore provide a suitable green screen to reduce visual impacts on neighbours, especially as much of the neighbouring properties look downward onto the project so trees will likely need to be significantly tall to screen.

Application ID	23214934
Created	26/03/2026 5:58 PM
Modified	26/03/2026 6:00 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Visual
Comments	The EIR mentions current trees on the boundary fence, however, these have been ring-barked by car tyres that were put in place by the owner when planted - these trees are weak and are dying, thus providing no screening nor a suitable future option for screening

Application ID	23215850
Created	26/03/2026 10:06 PM
Modified	26/03/2026 10:09 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Visual
Comments	FLOW have claimed we don’t want a green screen, however, we stated we wanted to ensure that the green screen was not just randomly planted and had consideration to placement, type of tree, maintenance of the trees, impact of the weather on them, fire risk. FLOW have manipulated conversations with affected landholders to make it look like we are not trying to find a solution.

Application ID	23215859
Created	26/03/2026 10:10 PM
Modified	26/03/2026 10:13 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Visual
Comments	We have discussed with FLOW about the possibility that the remainder of the land not used by the BESS as a park that could then create a possible boundary to any future rural living developments, however, FLOW have stated they cannot enter into any commitments/agreements as they do not own the land the facility is proposed on. Why is it that FLOW and pick and choose which parts of a proposed development they engage with and which ones they don't rather than looking for real resolution/ideas to reduce the impact on neighbouring properties.

Application ID	23215878
Created	26/03/2026 10:13 PM
Modified	26/03/2026 10:15 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Fire Risk
Comments	We have concerns if the BESS facility catches on fire, the thermal run-away will place us (as neighbours) at risk but also the broader issue for the City of Port Lincoln if the resulting fire continues to more populated areas of Port Lincoln

Application ID	23215881
Created	26/03/2026 10:15 PM
Modified	26/03/2026 10:18 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Fire Risk
Comments	In FLOW's fire report, they are reliant on the local CFS to respond to their facility if there is a fire. In the event on a thermal run-away, the batteries could explode causing the surrounding areas to catch alight. In the time it will take for the CFS to respond, gain access to the site, and start cooling or suppressing the fire, the fire would have travelled likely uphill towards the city of Port Lincoln thus potentially burning out many properties and homes along the way. In addition, the direction of a fire would be directly towards the proposed main entrance of the site thus reducing the CFS's ability to reach the main facility

Application ID	23215891
Created	26/03/2026 10:18 PM
Modified	26/03/2026 10:22 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Fire Risk
Comments	Any fire of this facility is likely to cause the access from Flinders Highway to be cut, thus increasing the time it will take for any emergency services to attend/respond. This places homes on the outskirts of Port Lincoln at significant risk. Given there is a build up of pines and other trees lining Flinders Highway, there is a risk this vegetation if alight will increase the likelihood of falling embers further into the city of Pt Lincoln and create a vegetation corridor for a fire to travel into Port Lincoln with little ability to extinguish it.

Application ID	23215899
Created	26/03/2026 10:22 PM
Modified	26/03/2026 10:26 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Fire Risk
Comments	FLOW's fire risk report only focusses on the risk to the BESS facility and not from the BESS facility to other neighbouring homes, properties or community. This report was written by a company that is based interstate and clearly does not have local knowledge of fire behaviour in this area

Application ID	23215916
Created	26/03/2026 10:26 PM
Modified	26/03/2026 10:28 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Fire Risk
Comments	FLOW's fire report states they are reliant on Little Swamp as a "permanent water source". This is evidence the author of the report has no knowledge of the local area as Little Swamp is dry for parts of the year including the period of fire danger season/summer.

Application ID	23215917
Created	26/03/2026 10:28 PM
Modified	26/03/2026 10:36 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR/SEO - Fire Risk
Comments	We have concerns with a propose green screen which may increase the fire risk to neighbouring properties if not managed properly. The SEO only mentions there will be a maintenance plan but no details are provided as to what this is or even what type of green screen is being proposed.

Application ID	23215942
Created	26/03/2026 10:37 PM
Modified	26/03/2026 10:41 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Fire Risk
Comments	The plans include a pit for storing any water runoff in the event FLOW need to extinguish a fire on one of the batteries. Given BESS' cannot be put out with water, how big is this pit going to be in Litres as this is not clear

Application ID	23215983
Created	26/03/2026 10:51 PM
Modified	26/03/2026 11:01 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR/SEO - Fire Risk
Comments	If a fire was to occur, any water that is not FULLY captured and contained in a pit will enter the underground water aquifer - which is illegal. The EIR has assessed this as unlikely and notes the groundwater levels are too deep to be impacted. the Dept for Environment and Water have been clear in past development applications that there is to be NO impact of potentially contaminated water entering an underwater system - this is why feed lotting of cattle is prohibited from this area due to 'potential' risk.

Application ID	23215999
Created	26/03/2026 11:01 PM
Modified	26/03/2026 11:05 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - impact on future development opportunities
Comments	Our property has been included in discussions and past applications from the DCLEP for subdivision of this land for rural living. This BESS will impact our ability to sell the allotments due to noise and visual impacts and we should be fairly compensated for this loss of future development opportunities.

Application ID	23216031
Created	26/03/2026 11:19 PM
Modified	26/03/2026 11:21 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - impact on future enjoyment of land
Comments	we have owned this land since 2000, our children have grown up on this property, therefore they have a right to the future enjoyment of this land as this is their home. Should they wish, they should have the ability to subdivide to build their own homes on this land as a generational investment without the risk of visual/noise impacts.

Application ID	23216035
Created	26/03/2026 11:21 PM
Modified	26/03/2026 11:23 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Public Consultation Process
Comments	FLOW sent us an email dated 13/2/2026, stating the EIR and SEO are available to view as part of the public consultation, they have embedded a link https://www.energymining.sa.gov.au/ptlincoln-bess, however when you follow the link, the page is not found. How can the public comment on something they cannot access -

Application ID	23216040
Created	26/03/2026 11:23 PM
Modified	26/03/2026 11:24 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Public Consultation Process
Comments	It is of concern the only documents that are available for public consulation/consideration are those prepared by and submitted by FLOW. These documents would be heavily skewed in the favour of FLOW as they are keen to build this facility. There needs to be a balanced view of pros and cons to this type of facility for community consideration.

Application ID	23216048
Created	26/03/2026 11:24 PM
Modified	26/03/2026 11:27 PM

Name	SH & ND Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Public Consultation Process
Comments	We received an email from FLOW on 19/9/2025 as part of our ongoing communication to raise our concerns about this project, in this email, FLOW reference offering us a Neighbour Benefit Agreement. They state When Flow Power develops an energy project, we are committed to delivering benefits in the communities we work. To acknowledge the potential visual impact as well as potential disruption during construction, Flow Power would like to offer a Neighbourhood Benefit Scheme through a combination of annual payments and a one-off payment up front during construction if the project goes ahead. We've put something together and would really appreciate your thoughts on this. The offer includes: An annual payment of 2,000 per year (starting in line with operations) for the life of the project (20 years). This payment increases with CPI annually. A 5,000 payment in line with commencement of construction. This offer is voluntary and completely up to you. This offer does not stop you from voicing concerns or raising complaints to Flow Power at any stage of the project. The agreement asks you to refrain from formally objecting to the project to the state government." We are highly offended that FLOW only view our visual impact as being valued at 2000 per year and are also highly offended if we are to accept this offer, that we are to 'refrain from formally objecting to the project to the state government'. We take this to be likened to a bribe for our silence.

Application ID	23230719
Created	30/03/2026 2:10 PM
Modified	30/03/2026 2:24 PM

Name	Scott Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Consultation with Stakeholders
Comments	In phone conversations with FLOW, the Project Development Officer stated FLOW would not provide an offer to landholders impacted, however, would consider one if submitted by a landholder. We provided a proposal to FLOW on 20/12/2025 including what we believed was a fair justification of the future impact on development of the land, including 2 properties on the market of similar value to our land. FLOW responded on 15/2/2026 declining the offer, maintained their existing offer of the neighbourhood payment (which included us having to refrain from formally objecting to the project) and noted they would discuss with the DCLEP a community benefit fund - this is in no way working with us as the most affected by this project. The DCLEP main site is Cummins (76kms) away from the BESS facility. Again this appears to be 'bribing' the DCLEP to approve the project going ahead without genuine consideration of the impact to direct neighbours to the project.

Application ID	23230908
Created	30/03/2026 2:25 PM
Modified	30/03/2026 2:40 PM

Name	Scott Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - local jobs
Comments	The EIR states "The Project will also provide much needed jobs for Port Lincoln and the Lower Eyre Peninsula during the construction phase", however there is no documentation to support this claim, nor does the documents indicate how many this will be. In conversations with FLOW, they have repeatedly stated they will not commit to agreeing to any local businesses being involved as they don't own the land and as Tier 1 project, this decision is up to the major contractor once engaged - therefore there is no guarantee that any 'locals' will be employed or contracted on this project.

Application ID	23231113
Created	30/03/2026 2:41 PM
Modified	30/03/2026 3:11 PM

Name	Scott Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - Consultation with Stakeholders
Comments	In a conversation with x2 wardens from Pt Lincoln Prison, they have not had any communication about the BESS project (either via FLOW directly, Dept of Mining or internally). This raises concerns for the ongoing wellbeing of the prisoners and the staff who will be highly affected by the noise emitted from the project. Also of concern is a major stakeholder that may not have received any information about the project.

Application ID	23231735
Created	30/03/2026 3:40 PM
Modified	30/03/2026 3:56 PM

Name	Scott Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - property access
Comments	The EIR indicates the main entrance will be via Flinders Highway. during construction this will cause significant obstructions to traffic given that much of the area of Boston use this to enter Pt Lincoln of a morning and after school/work as Lincoln Highway is very congested. The entrance is partially obscured to traffic as well as those entering and exiting the site with risk of slow moving traffic coming in an out of the project area.

Application ID	23231927
Created	30/03/2026 3:57 PM
Modified	30/03/2026 4:01 PM

Name	Scott Linsell
Organisation	Farmer
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	EIR - impact on future development opportunities
Comments	This project, by being adjacent to our land, is likely to impact future development opportunities due to the visual and noise impacting on the landholders enjoyment of their own property. Given primary producers have limited superannuation options, the ability to sub-divide has always been an option to self fund retirement and this will be unfairly impacted by the project.

Application ID	23228060
Created	30/03/2026 9:40 AM
Modified	30/03/2026 10:12 AM

Name	Bernadette Zollo and Hagen Zerk
Email	[redacted]@gmail.com
Which sections of the EIR and/or SEO does your feedback relate to?	Concerns for BESS
Comments	Please find Attached Letter stating our concerns for BESS being installed on the adjoining property to Our Home. We would Appreciate that our concerns be heard and negotiations personally be addressed., as we are the Ones that will be everyday living next to the BESS, and dealing with the Significant devaluation of our Home and Property. Regards Hagen Zerk And Bernadette Zollo
Attachments	Dear Flow Power Team- (1).pdf

Flow Power Team,

I am writing to formally express my concerns regarding the proposed installation of battery infrastructure on the adjoining property to my residence.

While I understand the broader benefits of energy storage projects, I am deeply concerned about the direct and negative impacts this development will have on my property, my family's wellbeing, and the long-term value of my land.

Firstly, I believe the presence of a large-scale battery installation will significantly affect the valuation of my property. The proximity of such infrastructure is likely to deter potential buyers and reduce market appeal, ultimately resulting in financial loss. This is particularly concerning given that my property currently benefits from a peaceful setting and unobstructed views, both of which will be compromised.

The visual impact of the development is another major issue. The introduction of industrial-scale infrastructure into what is currently a natural or semi-rural outlook will detract substantially from the aesthetic quality of my property. This change will not only affect my enjoyment of my home but will also contribute to its devaluation.

In addition, I am concerned about the potential noise generated by the battery system. While I understand that projected noise levels may be provided in decibels on paper, these figures do not adequately represent the real-world experience of living near such a facility. Noise perception is highly subjective and situational, and without personally experiencing the operational sound, it is difficult to accept assurances that it will not be disruptive to myself and my family.

There are also serious concerns regarding the risk of fire associated with battery storage systems. I would like detailed information on how these risks will be managed, including safety protocols, emergency response measures, and any containment systems that will be implemented to protect nearby properties.

Furthermore, I do not believe the current financial offer made in relation to visual screening through vegetation is sufficient. Given the scale of the impact, I believe Flow Power should take full responsibility for the design, implementation, and maintenance of appropriate vegetation screening to adequately shield my property from the development. This should not be left as a burden for me to manage.

In addition to the above, I request that a significantly increased financial compensation package be considered. The current offer does not adequately reflect the cumulative impacts this development will have, including the loss of property value, Subdivision options for my Property, reduced visual amenity, potential noise disturbance, and perceived safety risks. I will incur a tangible financial loss as a direct result of this project, and it is reasonable that any agreement includes compensation that properly accounts for this ongoing and long-term detriment.

In light of the above, I request that Flow Power reconsider its current position and enter into further negotiations regarding appropriate compensation. This should include full coverage of effective visual screening measures with natural Vegetation, as well as a revised and increased monetary offer that reflects the devaluation of my property and the broader impacts on my quality of life.

I would appreciate a detailed response addressing each of these concerns, as well as an opportunity to discuss this matter further.

Yours sincerely,

Bernadette Zollo and Hagen Zerk

[redacted]

Phone: [redacted]

Email: [redacted]@gmail.com

Appendix B – Responses to submissions received (excerpt from EIR)

APPENDIX A.11

Document: Comments Register - EIR & SEO
Project: Port Lincoln BESS
Application No.: AIL015
Applicant: Flow Power

Summary of Submissions and Responses – Statutory Public Consultation

Comment #	Topic/Section	Agency and Public Submissions comments	Proponent/Consultant Response	Document/Section
1			**Bernadette Zollo and Hagen Zerk (adjacent landowners)**	
1.0	Land valuation concern	Firstly, I believe the presence of a large-scale battery installation will significantly affect the valuation of my property. The proximity of such infrastructure is likely to deter potential buyers and reduce market appeal, ultimately resulting in financial loss. This is particularly concerning given that my property currently benefits from a peaceful setting and unobstructed views, both of which will be compromised.	While the Hydrogen and Renewable Energy Act 2023 and Regulations do not establish a framework for assessing or compensating land valuation, the amenity impacts underlying that concern – visual and noise – have been assessed in the EIR and are managed through enforceable commitments in the SEO, which becomes a condition of the licence under s62(7) of the HRE Act. Visual: assessed in EIR Section 8.12, with landscape screening committed under SEO Objectives 11 and 12 (VA1/VA2), including establishment and ongoing maintenance for the life of the project. Flow Power is facilitating screening on site and additionally remains willing, at its cost, to establish and maintain screening on the submitters' land if they wish to take up that offer. Noise: the noise assessment demonstrates compliance with the Environment Protection (Commercial and Industrial Noise) Policy 2023 at the nearest receivers (EIR Section 8.8), and a post-construction noise survey is committed under SEO Objective 6 to verify the modelled levels in operation, with operational compliance under Objective 7.	EIR Section 8.8, Section 8.12; SEO Objective 6, 7, 11, 12
2.0	Visual impact	The visual impact of the development is another major issue. The introduction of industrial scale infrastructure into what is currently a natural or semi-rural outlook will detract substantially from the aesthetic quality of my property. This change will not only affect my enjoyment of my home but will also contribute to its devaluation.	Flow Power has added a landscaping buffer along the eastern boundary of the site to assist in screening the site visually from the neighbouring property to the east. EIR - Section 8.12 Visual Amenity addresses mitigation. SEO - Table 2 includes control measures to address visual impact. The visual impact has been assessed in EIR Section 8.12 (including the Pound Lane viewpoint photomontage), and mitigation is committed through SEO Objectives 11 and 12 (VA1/VA2). A landscaping buffer has been added along the eastern boundary to help screen the BESS from the neighbouring property, and a southern-boundary landscaping section has also been incorporated. Flow Power has offered to develop landscape screening in consultation with the landowners. Following the landowners' October 2025 request that no works proceed on their property without their written consent, that offer remains open.	EIR Section 8.12; SEO Objective 11, 12 (VA1/VA2)
3.0	Noise	In addition, I am concerned about the potential noise generated by the battery system. While I understand that projected noise levels may be provided in decibels on paper, these figures do not adequately represent the real-world experience of living near such a facility. Noise perception is highly subjective and situational, and without personally experiencing the operational sound, it is difficult to accept assurances that it will not be disruptive to myself and my family.	The Environment Protection (commercial and industrial noise) Policy 2023 (the Noise Policy) is applicable under the Environment Protection Act 1993 and is also listed as an example of applicable government legislation for assessment of noise impacts under the HRE Act. Noise emissions from site have been modelled in SoundPLAN Environmental Software v9.1 program, using the Conservation of Clean Air and Water in Europe (CONCAWE) algorithms. As the proposed BESS facility may operate at any given time, noise emissions must be assessed for both day and night time compliance. The predicted indicative noise levels comply with the Noise Policy day and night time criteria at all receivers and addressed all criteria under HRE Environmental Impact Assessment based on: • All inverters to be installed with attenuation kit • All equipment orientation to be aligned as shown in site plan • Civil benching as proposed by Flow Power • Four metre high solid noise barrier with extent. The noise wall has been included on the north eastern sections of the site plan to ensure compliance with the EPA noise policy. EPA (South Australia) has reviewed the EIR and confirmed compliance. The SEO details Flow Power's requirements with respect to noise compliance: Objective 6 - Noise and Vibration (NV1 Constriction Phase) including (but not lmited to): - Construction noise management adressed in the CEMO and adhered to. - Activities restricted to daytime hours as far as practicable -Vehicles and equipment are turned off when not in use. Objective 7 - Noise and Vibration (NV2 Operational phase) including (but not limited to): - Operational noise management including noise attenuation measures addressed in the OEMP are adhered to. Operational noise has been modelled (SoundPLAN v9.1, CONCAWE algorithms) for both day and night, and the predicted levels comply with the Environment Protection (Commercial and Industrial Noise) Policy 2023 at all receivers, based on inverter attenuation kits, equipment orientation, civil benching and a four-metre solid noise barrier. EPA (SA) has reviewed the assessment and confirmed it accords with the Noise Policy (EIR Section 8.8). A post-construction noise survey is committed under SEO Objective 6, undertaken in accordance with an approved Operational Environmental Management Plan / Noise Management Plan, to verify in operation that the modelled levels are achieved; operational noise is managed under Objective 7 (NV2), with complaints handling.	EIR Section 8.8; SEO Objective 6, 7 (NV1/NV2)

Document: Comments Register - EIR & SEO
Project: Port Lincoln BESS
Application No.: AIL015
Applicant: Flow Power

Comment #	Topic/Section	Agency and Public Submissions comments	Proponent/Consultant Response	Document/Section
4.0	4. Fire Risk	There are also serious concerns regarding the risk of fire associated with battery storage systems. I would like detailed information on how these risks will be managed, including safety protocols, emergency response measures, and any containment systems that will be implemented to protect nearby properties.	Fire risk for the surrounding properties as the result of BESS construction and operation is well mitigated due to the high level of controls including managed asset protection zones (APZ) and firefighting infrastructure. Additional detail has been added to the concept layout of the project in line with the recommendations of the South Australian Country Fire Service (SACFS) specifying the required Asset Protection Zones (APZ) and on-site water supply. The Project EIR and SEO further demonstrates Flow Power's obligations: EIR Section 10 'Control and Management Strategies' — Impact Event PH&S1 SEO Objective 4 - Public Health and Safety (PH&S1) Fire risk to surrounding properties is managed through a layered set of controls. The site concept layout has been updated to incorporate the South Australian Country Fire Service (SACFS) recommendations – managed Asset Protection Zones (17 m to the north, east and south boundaries; 20 m to the west), perimeter access roads, two access points, and on-site water supply for firefighting. These are assessed in the EIR and detailed in EIR Section 10 (Control and Management Strategies, Impact Events PH&S1/PH&S2). The SEO makes the key commitments enforceable through Objectives 4 and 5 (PH&S1/PH&S2): preparation of a Fire Safety Study and Fire Risk Management Plan (determining safety clearances, radiant-heat-flux withstand requirements and firefighting methodologies at detailed design), and installation and maintenance of an independent fire detection system to manufacturer specifications and Ministerial Building Standard MBS 002. Flow Power will continue to consult SACFS through design, construction and operation. The Fire Safety Study is finalised at detailed design (pre-construction); the SEO commitment ensures it is completed and complied with before the relevant works proceed.	EIR Section 10 (PH&S1/PH&S2); SEO Objective 4, 5
5.0	Insufficient offer of compensation	Furthermore, I do not believe the current financial offer made in relation to visual screening through vegetation is sufficient. Given the scale of the impact, I believe Flow Power should take full responsibility for the design, implementation, and maintenance of appropriate vegetation screening to adequately shield my property from the development. This should not be left as a burden for me to manage. In addition to the above, I request that a significantly increased financial compensation package be considered. The current offer does not adequately reflect the cumulative impacts this development will have, including the loss of property value, Subdivision options for my Property, reduced visual amenity, potential noise disturbance, and perceived safety risks. I will incur a tangible financial loss as a direct result of this project, and it is reasonable that any agreement includes compensation that properly accounts for this ongoing and long-term detriment. In light of the above, I request that Flow Power reconsider its current position and enter into further negotiations regarding appropriate compensation. This should include full coverage of effective visual screening measures with natural Vegetation, as well as a revised and increased monetary offer that reflects the devaluation of my property and the broader impacts on my quality of life.	The EIR and SEO has been drafted in line with South Australian regulatory and legislative requirements (Hydrogen and Renweable Energy Act 2023, and the Hydrogen and Renewable Energy Regulations 2024) which does not prescribe land valuation. The neighbour benefit offer extended is in line with industry best practice.	-
2			**Air Services Australia**	
6.0	Aviation	Assessment undertaken by Air Services for any impacts to Airservices Precision/Non-Precision Navigation Aids, Anemometers, HF/VHF/UHF Communications, A-SMGCS, Radar, PRM, ADS-B, WAM or Satellite/Links. No objections to the proposal. No additional instructions from Air Traffic Control Operations (ATC). The proposed activity does not impact Airservices operations or any aerodrome	Air Services have confirmed no impact to its equipment or operations.	EIR Section 8.11
3			**Planning and Land Use Services - Department of Housing and Urban Development**	
7.0	Decommissioning	Recommendation - If a licence is granted, condition(s) relating to decommissioning should be included, to facilitate the removal of infrastructure and return of impacted land to predevelopment condition.	EIR Section 4.3 'Management Plans' — Decommissioning and Rehabilitation Plan as part of OEMP. SEO Table 2 — Objective 14 'Rehabilitation (General)': 'OEMP includes a Decommissioning and Rehabilitation Plan.	EIR Section 4.3; SEO Objective 14 (Rehabilitation)

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8.0	Vegetation screening	Recommendation - A condition ensuring ongoing maintenance and management of the proposed vegetation screening is included, particularly around its initial planting and establishment. Consideration to additional screening further around the BESS	This recommendation is in line with Flow Power's expectations. Additional landscaping screening to the south and the east of the project has also been included. EIR Section 8.12 'Visual Amenity' — mitigation treatments). SEO Table 2 — Objective 12 (VA2 Operational Phase): 'Landscaping treatments are maintained in accordance with the landscape concept plan prepared by RPS.'	EIR Section 8.12; SEO Objective 12 (VA2)
9.0	Barngala People	Recommendation - Further consultation with local Barngarla People or their representatives to obtain relevant further information that may pertain to the site.	Flow Power is actively engaged with Barngala People and their representatives and is committed to undertaking further assessments of the project site beyond the desktop assessment prepared to inform the EIR and SEO. Should a licence be granted, a Cultural Heritage Management Plan will be prepared with the Barngala People. Flow Power has commenced engagement with the Barngarla People, who are identified as a key stakeholder (refer EIR Section 5 and Section 8.4). The Federal Court has determined that native title does not exist in the Project area, and the heritage desktop assessment (IHC) concluded a low risk of encountering Aboriginal sites or objects. Flow Power's position is that the most significant next step in our engagement with the Barngarla Determination Aboriginal Corporation (BDAC) – being the development of a Cultural Heritage Management Plan (CHMP) – is best undertaken following the grant of the AIL, when project certainty allows BDAC's input to be used effectively. The EIR (Section 8.4) and SEO (Objective 1 – AH1) commit to preparation of a CHMP, an unexpected-finds protocol with stop-work procedures, and ongoing engagement with the Barngarla People throughout the Project. The development and adherence to a Cultural Heritage Management Plan (CHMP), in consultation with the Barngarla People, has now been added as a leading performance criterion in SEO Objective 1 (AH1) and EIR Table 10 (AH1). The AH1 control measure has been updated from 'Develop Heritage Management Plan' to 'Develop and adhere to a CHMP in consultation with the Barngarla People'.	EIR Section 8.4; SEO Objective 1 (AH1)
10.0	Heritage	Recommendation - The inclusion of advisory note/s/ ensuring an adequate Heritage Plan and measures included to ensure if heritage items and or artefacts are identified on site there is an appropriate plan in place. In accordance with the Aboriginal Heritage Act 1988 and The Heritage Places Act 1993	As per above recommendation, a Cultual Heritage Management Plan will be prepared. In addition, cultural heritage is addressed in the EIR & SEO: EIR Section 8.4 'Heritage (Aboriginal and non-Aboriginal)' — heritage risk mitigation, including the five-bullet list of measures. SEO Table 2 — Objective 1 (AH1 'Aboriginal Heritage'): control measure 'Establish an unexpected finds protocol and include in the CEMP. Aboriginal and non-Aboriginal heritage is managed under EIR Section 8.4 and SEO Objective 1 (AH1), including a CHMP, an unexpected-finds protocol and stop-work procedures. Substantive CHMP development with BDAC is proposed following licence approval so that the engagement is meaningful and an efficient use of BDAC's time. As per comment #9 – the CHMP, developed and adhered to in consultation with the Barngarla People, is now captured as a leading performance criterion in SEO Objective 1 (AH1) and EIR Table 10 (AH1).	EIR Section 8.4; SEO Objective 1 (AH1)
11.0	Civil Aviation	Recommendation - The Environmental Impact Report notes the CEMP will liaise with the Civil Aviation Safety Authority. Recommended to discuss as soon as practical with the appropriate authority regarding the proposal to ensure appropriate feedback can be obtained prior to construction commencing	Noting the correspondence receiced AirServices Australia, Flow Power will provide this directly to CASA, including any updates to the project layout. Flow Power notes there are no anticipated material changes to project structure heights on the site, and no aenometers/aerials are proposed to be constructed on site.	EIR Section 8.11
12.0	Stormwater runoff	Recommendation - The proposed design causes no increased stormwater runoff or diversion to areas outside of the site., with particular regard to the Little Swamp water body that appears lower than the subject site.	This recommendation is in line with Flow Power's expectations. EIR Section 8.7 'Surface water' — EIR Appendix A.2 (ELA hydrology assessment, 2025). EIR Section 10 — Flood and Surface Water Mitigation - Design Response to Flooding SEO Table 2 — Objective 8 (SW1) and Objective 9 (SW2): Stormwater Management Plan, GDE avoidance.	EIR Section 8.7, Section 10; SEO Objective 8, 9 (SW1/SW2)

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13.0	Screening	Recommendation - Even though it is considered ideal to place complimentary land uses adjacent one another, further investigation into the incorporation of screening through vegetation plantings to prevent a mass of infrastructure dominating the landscape may be worth consideration, noting the sparsity of mature trees in the immediate vicinity.	Flow Power has added a landscaping buffer along the eastern and southern boundaries of the site to assist in screening the site visually from the neighbouring properties to the east and south, and has added noise walls to the south, helping to further shield the visual impact of the BESS from that direction. EIR Section 8.12 'Visual Amenity' — mitigation treatments paragraphs (landscaping along western flank of BESS, eastern boundary buffer, southern noise wall). SEO Table 2 — Objectives 11 (VA1) and 12 (VA2): landscape concept plan controls.	EIR Section 8.12; SEO Objective 11, 12 (VA1/VA2)
14.0	Land Use	The subject site is located within the Rural Zone of the Planning and Design Code. The Zone envisions uses that support, 'the economic prosperity of South Australia primarily through the production, processing, storage and distribution of primary produce, forestry and the generation of energy from renewable sources.' DO1. The zone also seeks that, 'The productive value of rural land for a range of primary production activities and associated value adding, processing, warehousing and distribution is supported, protected and maintained.' PO1.1. A Renewable Energy Facility is listed as an envisaged form of development intended for the zone. The subject site is a rural property, approximately 26.4-hectares, with the BESS development located in a small irregular area in the western portion. The site is a freehold property that is currently vacant. The BESS is intended to connect into the Port Lincoln Substation and electricity transmission network, to the site's immediate north. The life span of the project is 20 years.	Noted. The Project is a Renewable Energy Facility – an envisaged and desired form of development within the Rural Zone – and supports the Zone's objective of energy generation from renewable sources. The Project does not require a change of land use and is compatible with surrounding primary production.	EIR Section 8.11
15.0	Setbacks & Visual Impact	The application has been accompanied with an Environmental Impact Report (EIR) which includes a planning and land use assessment. Setbacks and Visual Impacts General Development Policies, Interface between Land Uses, seeks, Development is located and designed to mitigate adverse effects on or from neighbouring and proximate land uses, DO1	Noted. The BESS is sited and designed to mitigate adverse interface effects, with significant setbacks to sensitive receptors (nearest dwelling >600 m) and landscape/screening treatments. Visual impacts are assessed in the EIR and VIA and managed through SEO Objectives 11 and 12 (VA1/VA2); noise interface effects are addressed in the EIR and SEO Objectives 6 and 7.	EIR Section 8.8, Section 8.12; SEO Objective 6, 7, 11, 12
16.0	Bushfire Risk	Bushfire Risk The EIR includes a detailed Fire Safety assessment and incorporation of several fire suppressant or mitigation measures to reduce the impact of a fire either on or from the BESS. Recommendations • NA	Noted. Bushfire risk is assessed in the EIR and managed through fire safety/suppression measures and SEO Objectives 4 and 5 (PH&S1/PH&S2), developed in consultation with the SACFS and in accordance with the SACFS Renewable Energy Facilities Guide (refer to comments #23, #24 and #28).	EIR Section 8.3; SEO Objective 4, 5
17.0	Aboriginal & Non-Aboriginal Heritage	Aboriginal and non-aboriginal heritage Noted site is within the Native Title Claims of the local Barngarla People for the project site. Preliminary investigations noted an absence of recorded Aboriginal or non-Aboriginal heritage places within the site area.	Noted. The Federal Court has determined native title does not exist in the Project area, and the heritage desktop assessment (IHC) identified no recorded Aboriginal or non-Aboriginal heritage places within the site. Heritage is managed through the EIR and SEO Objective 1 (AH1), including a CHMP, unexpected-finds protocol and stop-work procedures (refer to comments #9 and #10).	EIR Section 8.4; SEO Objective 1 (AH1)
18.0	Surface Water & Flooding	Surface Water and Flooding Several key stormwater design elements included in the BESS proposal.	Noted. Key stormwater design elements (a Stormwater Management Plan, erosion and sediment control, preservation of ephemeral flow paths and protection of Little Swamp) are committed to in the EIR and SEO Objectives 8 and 9 (SW1/SW2) and Objective 23 (SW3). Detailed stormwater design will be finalised at the detailed design phase (refer flood responses).	EIR Section 8.7, Section 10; SEO Objective 8, 9 (SW1/SW2), 23 (SW3)

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19.0	Airport Building Heights Overlay	Airport Building Heights (Regulated) Overlay As identified in the overlay the site is includes the Airport Building Heights (Regulated) Overlay. Generally, any development within this overlay requires a referral to the airport-operator for the relevant airport, (Port Lincoln Airport).	Noted. The site is within the Airport Building Heights (Regulated) Overlay for Port Lincoln Airport. Given the minimal height of the proposed BESS infrastructure (well below the adjacent transmission towers and substation) and the intervening distance, the prescribed airspace will not be penetrated. Flow Power will consult with CASA and, where required, refer to the airport operator; this is addressed in the EIR and will be incorporated as a requirement in the CEMP.	EIR Section 8.11
20.0	Regional Plans	The subject site is within the Eyre and Western Regional Plan, January 2026. Within this plan Port Lincoln is identified as a Regional City. The plan identifies the region as having the opportunity 'to become a renewable energy powerhouse for South Australia, complementing its existing economic base.' The Regional Plan encourages and supports the provision of sustainable, renewable energy generation and storage options. Noting the regions issues relating to reliability, quality, and ageing infrastructure combined with the extent and area the network covers encourage multiple renewable energy options to be developed to address these concerns. 'The siting of any new large-scale renewable energy facility should avoid scenic landscapes and environmentally or culturally significant areas'. The location of the proposal adjacent the Port Lincoln Substation is considered appropriate in keeping similar land uses clustered together and minimising the visual impact on areas that have no equivalent development.	Noted and supported. The Project is consistent with the Eyre and Western Regional Plan (January 2026), which identifies the region's opportunity to become a renewable energy powerhouse and supports sustainable, renewable energy generation and storage. The Project contributes to network reliability and quality.	EIR Section 8.14
21.0	State Planning Policies	The proposal directly relates to State Planning Policy 12 (Energy), that envisages, 'The provision of sustainable, reliable and affordable energy is essential in meeting the basic needs of communities and ensuring the long-term supply of key services across South Australia.' Policies 12.1, 12.2, 12.3and 12.4 are worth key consideration. Recommendations NA	Noted. The Project aligns with State Planning Policy 12 (Energy), supporting the provision of sustainable, reliable and affordable energy and the long-term supply of key services across South Australia.	EIR Section 8.14
4			EPA	
22.0	Noise	Clause 11(2) of the Environment Protection (Commercial and Industrial Noise) Policy 2023 notes that the location of measurement for a noise assessment at a noise-affected premises should be "within or near, and at the same approximate elevation as, an area frequented by persons residing, working or sleeping at the premises...". Clause 19(2)(b) required the assessments to be undertaken at "future premises ... determined by the Authority to be premises that might be adversely affected by the noise source". The guidelines for the use of the noise policy notes that "this should only occur where ... an approved development application exists for future dwellings...". It is noted that the land owner has an intention to subdivide the land, however, no approval has been granted yet. If the location marked out in red currently doesn't have a clear purpose where someone might be working, sleeping, or regularly frequented, and no approved development application exist for new residential land uses, then the noise policy does not require an assessment at this location.	Flow Power notes that this correspondence confirms the noise assessment has been carried out in line with the the Environmental Protection (Commercial and Industrial Noise) Policy 2023. The assessment and modelling was carried out by qualified acoustic engineers. The noise assessment report has been updated to include the effects of the additional noise wall to the south. EIR Section 8.8 'Noise and vibration' EIR Appendix A.8 Resonate environmental noise assessment.	EIR Section 8.8, Appendix A.8

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5		Country Fire Service		
23.0	CFS general	South Australia Country Fire Service has regard for the bushfire hazard(s) to and from the site, and any mitigation measures required to prevent spread of fire to the site, or the environment as a result of the activities within the site. SACFS provides the following comments: - The site is located within the areas designated Hazards (Bushfire General) Overlay. - The site is within the Lincoln fire station (CFS) response area - Performance outcomes for Land Use do not apply inthis hazard overlay	Noted. The 'Port Lincoln BESS – CFS Bushfire Planning Compliance Table' has been prepared and is referenced in the EIR (Section 8.3) and accompanies the EIR (Appendix A10). The table assesses the Concept Layout (17 April 2026) and supporting management plans against each SACFS requirement and recommendation.	EIR Section 8.3 & CFS Compliance Table
24.0	Sitting	- The SACFS recommends establishing and maintaining an Asset Protection Zone (APZ) to create a setback/buffer to any infrastructure using mineral earth breaks, roadways and/or areas of managed vegetation to prevent or prohibit the spread of bushfires to and from the site, minimising the risk to life, and or damage to buildings and property and maintain a fuel reduced zone for safe movement of occupants and firefighters. - SACFS notes the current proposal does not meet this requirement -SACFS recommends all buildings and infrastructure such as Substation, Inverter stations, BESS and Control Buildings or other similar assets, should be located away from the property boundaries/site boundary perimeter fence or existing vegetation being retained, for the purposes of maintaining an APZ and to achieve a maximum exposure of no more than BAL 12.5 kW/m2*, in line with the separation distances provided below: North, East, South elevations: 17m separation distance West elevation: 20m separation distance	Noted & concept layout amended to show compliant APZ in line with CFS comments. APZs have been included in the latest revision of the project design layout, demonstrating compliance with this recommendation of 17m APZ for north, east, south boundaries and 20m APZ for west boundary. EIR Section 4.1 'Proposed Development (BESS Facility)' — site layout (Figure 2 Concept Layout Plan) shows APZ separations. EIR Section 10 'Control and Management Strategies' — Impact Events PH&S1 and PH&S2 control measures SEO Table 2 — Objectives 4 (PH&S1) and 5 (PH&S2): APZ and fire safety controls. SACFS guidance – the SACFS Renewable Energy Facilities Guide (https://resources-production.safecom.sa.gov.au/current/docs/renewable-energy-facilities-guide.pdf) – is now referenced in EIR Section 8.3 and in the PH&S1 and PH&S2 control measures (Table 10), and in the SEO Objectives 4 and 5 control measures. A criterion that the final site design will be developed in consultation with the SACFS and comply with the Guide has been added to SEO Objectives 4 and 5.	EIR Section 8.3, Table 10; SEO Objective 4, 5
25.0	Access/Egress	Access / Egress: SACFS notes that the proposal does not inclue roads of adequate design to satisfy the desired outcomes of the Hazard Overlay. Perimeter roads with a minimum formed road width of 6 metres should be incorporated to achieve adequate separation between infrastructure and areas of bushfire hazard to support safer access for the purposes of fire fighting or provide mineral earth breaks for passive protection from spread of fire to and from the site.	Noted. The updated revision of the project layout shows the road detail, 6m width and with a secondary point of egress at the south-east corner of the site Consultation with the Department of Corrections (DoC) commenced in 2025 for the development of a new access easement between Pound Lane and the project site meeting the minimum road widths for access and egress to the project site. DoC have offered in-principle support for the development of this easement, requesting that the appropriate time to commence the formal process, following the granting of a licence for the project (correspondence uploaded to DEM Sharepoint with this submission.)	EIR Section 10 (PH&S1/PH&S2)
26.0	Vegetation Management	Vegetation management shall be established and maintained as per the separation distances provided in Table 1 of each Substation/Control Building/BESS or other similar assets: -The understorey plants within the Asset Protection Zone (APZ) shall be maintained such that when considered overall a maximum coverage of 30% is attained, and so that the leaf area of shrubs is not continuous. -No understorey vegetation shall be established within 10m of the Substation/Control Building site (Understorey is defined as plants and bushes up to 2m in height). -Grasses within the zone shall be reduced to a maximum height of 10cm during the fire danger season (e.g. by grazing, slashing or chemical treatment) -The APZ shall be maintained to prevent the accumulation of dead vegetation during the fire danger season. A single row of trees and/or shrubs are permitted for screening purposes located no less than 10m from all infrastructure and not connected to other hazardous vegetation. Located no less than 10m from the access road. Shrubs shall not be planted under trees. Species with a single stem habit are preferrd with the lower limbs removed to prevent toem connecting with grassy understorey. Screening plants should have low flammability characteristics, be kept in optimum health, pruned regularly and any dead vegetation removed.	We note that there is some landscaping planting within the western APZ which meets the requirements laid out by CFS. See updated concept layout and concept landscape plan in Appendix A1 of the EIR.	EIR Appendix A.1

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27.0	Water Supply	- Whilst there is presence of reticulated water in the area reticulated water supplies may be compromised during a bushfire event. Static fire water tanks for both bushfire, BESS and building fires will be required to assist in effective Fire Service intervention and suppression. - SACFS notes the current proposal does not meet this requirement. - Fire water tank (72,000L) to be made available to SA Fire Service Policy 14 requirements and include both large and small-bore suction outlets as per the policy and as follows: Access to the fire water tank shall be constructed of all-weather construction, with a minimum formed road surface width of 6 metres. • Located at the main entrance to the site. If unable to achieve this, then clear signage is to be provided to clearly and quickly identify the location of the fire water tank/s. • Fire water tanks shall be identified with signage in accordance with AS 2419.1. • Provision shall be made adjacent the fire water tank for a nominally level hardstand area (capable of supporting fire-fighting vehicles with a gross vehicle mass (GVM) of 21 tonnes) that is a distance equal to or less than 5 metres from the water supply outlet. • The fire water tank is required to be available to all BESS system pod/containers within 90 metres of hose lay of the static fire water tank. If this cannot be achieved, then additional static fire water tanks or a dry hydrant system may be required	This recommendation is in line with Flow Power's expectations. A hardstand for 2 x tanks with a combined capacity of a minimum of 288kL is included in the project design at the entrance to the site and shown on the updated layout. See updated concept layout and concept landscape plan in Appendix A1 of the EIR.	EIR Appendix A.1
28.0	Emergency Response Planning	The Bushfire Management Plan and the Emergency Management Plan will need to be established and reviewed and updated every 12 months by the company and/or its operators. Revised versions to be forwarded to the relevant SACFS Regional Office to use as a reference. The safety of first responders must be a priority, and emergency response plans should not require firefighters to open or enter the BESS compartment at any time. - The SACFS requires the company and/or its operators to remotely monitor the installed systems and be able to remotely shut down any live systems. In addition, a representative of the company and/or its operator is to be on site within 60 minutes of the 000 call for fire service attendance. - During the construction and decommissioning phases and whilst undertaking maintenance, proponents should provide the provision of basic fire-firefighting equipment at each site, including fire extinguishers, knapsacks, and other equipment suitable for initial response actions. - The company and/or its operators will be required to engage with the Regional SACFS representative on a regular basis, regarding on-site training and site inductions for emergency service personnel. MANIFEST BOX (or similar) - Given the complexities that the subject site presents, SACFS further recommends the installation of a Manifest Box at the main entrance of the site. This box (which looks a bit like a small meter box), should be red with white writing ‘Fire Protection system’ or similar, and clearly visible to fire crews as they access the site. Information contained should include, but is not limited to, a list of emergency contact phone numbers	The Project EIR and SEO further demonstrates Flow Power's obligations: EIR Section 4.3 'Management Plans' — Operational Environmental Management Plan EIR Section 10 'Control and Management Strategies' — Impact Events PH&S1 and PH&S2: SEO Table 2 — Objectives 4 (PH&S1) and 5 (PH&S2) control measures: emergency response plan in OMP, fire detection system maintained per MBS 002. The final site design will be developed in consultation with the South Australian Country Fire Service (SACFS) and will comply with the relevant requirements of the SACFS Renewable Energy Facilities Guide.	SEO Objective 4, 5

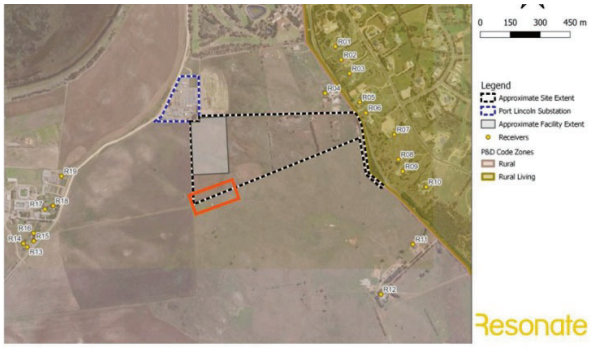
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		and a site plan highlighting vehicle access, turning ability, buildings and infrastructure locations, fire water i.e., fill locations, all fire protection equipment, and any on-site hazards or storage of dangerous materials i.e., LPG, fuels or chemicals. Access to the Manifest Box, if locked, must be readily accessible using a Lockwood 003-type padlock, in accordance with AS 4428.17. Additional notes for Energy facilities or BESS: • Access and working clearances for large emergency service vehicles to the "Electrical Transmission Area/control room area" needs to be incorporated. This includes a reasonable clear and safe working environment. • Servicing of the detection and suppression system (if installed) within the racks will be maintained to the manufacture's and to SA Ministerial Building Standard MBS 002 "Maintaining the performance of essential safety provisions" requirements andm recorded. • The SACFS will not accept BESS container fire detection system monitoring requests unless required by the NCC. • If a battery rack is required to be open at any time (including an emergency event), this will be done by the Company and/or its operator's staff and not the Fire Authority. • Developers and operators should have regard for the Australasian Fire and Emergency Services Authorities Council. (2025) Large-scale battery energy storage system installations (AFAC Publication No. 3105), AFAC, Melbourne, Australia Council 2025		
6			**Department of Primary Industries and Regions South Australia**	
29.0	General	General comments: PIRSA notes the property has historically been used for livestock production, but the land is not currently used for that purpose, and the dwelling is vacant. Consideration for livestock biosecurity risks, including when accessing the site via the easement, should be made as the adjacent land may be used for livestock production in the future and as there is a mandated referral relating to the Livestock Act 1997.	Flow Power notes this correspondence and has undertaken its engagement with the Department of Primary Industries and Regions. PIRSA advised that the mandated referral is the referral to the Minister administering the Livestock Act 1997 under section 73 of the HRE Act, and that all relevant aspects of that Act (including disease and contamination risk to livestock) should be considered irrespective of whether livestock are present. The EIR (Section 8.10) addresses livestock biosecurity raised by PIRSA: (i) spill/contamination risk to surrounding livestock; (ii) risk should livestock be run/agisted on the balance of the parcel (~22 ha) in future; and (iii) disease transmission/contamination through use of the access easement. Management is via the CEMP (wash-down/inspection – with particular attention to easement vehicles – and spill prevention). The SEO (Objective 3 – NFF1) biosecurity assessment criterion and leading performance criterion have been updated accordingly. Detection of a declared weed, pathogen or pest introduced/spread by Project activities is an immediately reportable incident.	EIR Section 8.10; SEO Objective 3 (NFF1)
7			**Department for Insfratructure and Transport**	
30.0	Traffic impacts	The Department is generally supportive of the traffic assessment for the subject proposal and concurs with the recommendations. ADVICE The Department for Infrastructure and Transport supports the proposal subject to the following conditions: 1. Prior to construction, a 'Construction Traffic Management Plan (CTMP)', shall be prepared to the satisfaction of the Commissioner of Highways. The TMP shall address matters including, but not limited to the following: a) Traffic volumes, distributions, routes and types of vehicles to be used in the construction phase of the development. b) A Traffic Management Plan (TMP) for each phase of construction of the development, including any road and access changes and any proposed upgrades and/or closures. The TMP shall also show all traffic devices to be utilised (including variable message signs) and any proposed traffic restrictions. The applicant shall notify DIT's Traffic Management Centre (TMC) – Roadworks on 1800 434 058 or email dit.roadworks@sa.gov.au to gain approval for any road works, or the implementation of a traffic management plan during the construction phase. Before any construction works the contractor(s) shall complete a 'Notification of Works' form via the following link: https://www.dit.sa.gov.au/contractor_documents/ works_on_roads_by_other_organisations c) Managing impacts to infrastructure within the road reserve. All vehicle movements shall be undertaken in accordance with the TMP.	The Project EIR and SEO demonstrates Flow Power's obligations: EIR Section 8.13 Traffic and Transport EIR Section 10 Control and Management Strategies SEO Table 2 — Objective 10 (T1 Traffic and Transport) The DIT recommendations have now been added as leading performance criteria in SEO Objective 10 (T1) and EIR Table 10 (T1): (i) a Construction Traffic Management Plan (CTMP), or equivalent, prepared prior to construction to the satisfaction of the Commissioner of Highways and included within the OEMP; and (ii) relevant permits for Restricted Access Vehicles obtained from the National Heavy Vehicle Regulator.	SEO Objective 10 (T1)

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31.0	Costs on road upgrades	All costs associated with the design and construction of any required arterial road upgrades/modifications required to facilitate the project (including, but not limited to, project management and any necessary road drainage upgrades, etc) shall be borne by the applicant. Note: The applicant shall contact DIT's Asset Manager – Zone 3, Mr Daniele Hockey (08) 8648 5297 or mobile 0403 094 106 (daniele.hockey@sa.gov.au) to obtain approval and discuss any technical issues regarding the required works. It should be noted that the applicant will need to enter into a Deed of Agreement with DIT for any road works on the arterial road network.	Noted.	SEO Objective 10 (T1)
32.0	Road reserve	Any infrastructure within the road reserve that is demolished, altered, removed or damaged during the construction of the project shall be reinstated to the satisfaction of the relevant asset owner, with all costs being borne by the applicant. The following note provides important information for the benefit of the applicant and is required to be included in any approval: • As Restricted Access Vehicles (including oversize and over mass components) are proposed to be utilised, the applicant must ensure that all necessary approvals/permits are obtained from the National Heavy Vehicle Regulator (refer link: https://www.nhvr.gov.au).	Noted.	SEO Objective 10 (T1)
8			**Scott and Nicole Linsell (adjacent landowners)**	
33.0	Land use	Why is the installation of a Battery system (being the primary function of the land) not considered a 'change of land use'. Land in this area is rural and a battery system is not rural. Even on this website the consultation sits under "industry" and the land is not industrial.	The project site is located within a Rural Zone under the South Australian Planning and Design code which recognises renewable energy development as a legitimate rural land use. The project site is also located within a designated South Australian Renewable Energy Zone.	EIR Section 8.11
34.0	Noise	The battery system will create an ongoing noise during any time that it is functioning - This noise is modelled to reach our home. Whilst the model indicates it will be within 'acceptable' levels, how is this measured ongoing given there is only 1db before it exceeds appropriate levels?	Operational noise compliance is committed through the SEO: Objective 7 (NV2) requires operational noise consistent with the Environment Protection (Commercial and Industrial Noise) Policy 2023, with complaints management. To verify the modelling in practice, a post-construction noise survey is committed under Objective 6, undertaken under an approved Operational/Noise Management Plan by a qualified acoustic consultant. The noise assessment (EIR Section 8.8; Resonate, EIR Appendix A.8) demonstrates compliance at the nearest receivers with the modelled mitigation in place. Where verification or complaints indicate an exceedance, it is managed under the SEO and is a compliance matter for DEM, with Flow Power to bring into compliance.	EIR Section 8.8; SEO Objective 6, 7 (NV1/NV2)
35.0	Noise	All noise predictions are based on modelling - what happens if once this is built, the modelling is wrong and the noise levels are higher than predicted?	Flow Power used conservative modelling assumptions. The assessment used conservative SoundPLAN modelling assumptions (EIR Section 8.8; Resonate, Appendix A.8), and Flow Power has further de-risked the outcome by adding a noise wall along the southern boundary to the same specification as the northern and eastern walls. Compliance does not rest on the model alone: a post-construction noise survey is committed under SEO Objective 6 to measure operational noise and confirm it meets the Noise Policy criteria, with operational compliance and complaints handling under Objective 7.	EIR Section 8.8; SEO Objective 6, 7
36.0	Noise	we have concerns that the BESS will impact the noise levels throughout our property impacting any homes that may built in future developments. Our property has been considered for development for many years and this is a future option for us. The Premier has stated housing is a major issue for thestate and this development will negatively on our ability to develop the land due to the noise impact.	EPA South Australia has confirmed the locations selected for the noise assessment are in line with the Environment Protection (Commercial and Industrial Noise) Policy 2023. The noise assessment carried out by Resonate noise consultants (2025 & 2026 - Appendix A8) demonstrates compliance with the Policy.	EIR Section 8.8; SEO Objective 6, 7

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37.0	Noise	Why is the noise levels only considered at our house and not at all points in our property? We have the right to enjoy the whole of our land and therefore not be impacted by the noise of the BESS.	Feedback received from the South Australian EPA notes: "Clause 11(2) of the Environment Protection (Commercial and Industrial Noise) Policy 2023 notes that the location of measurement for a noise assessment at a noise-affected premises should be "within or near, and at the same approximate elevation as, an area frequented by persons residing, working or sleeping at the premises...". "Clause 19(2)(b) required the assessments to be undertaken at "future premises ... determined by the Authority to be premises that might be adversely affected by the noise source". The guidelines for the use of the noise policy notes that "this should only occur where ... an approved development application exists for future dwellings...". It is noted that the land owner has an intention to subdivide the land, however, no approval has been granted yet." "If the location marked out in red currently doesn't have a clear purpose where someone might be working, sleeping, or regularly frequented, and no approved development application exist for new residential land uses, then the noise policy does not require an assessment at this location." Note: See image below showing the location marked out in red which was prepared for the adjacent landowner at their request.  Figure 1 Aerial image of site, adjacent land, and zoning	EIR Section 8.8; SEO Objective 6, 7
38.0	Noise	we have raised concerns with FLOWabout the noise levels and they issued us with a copy of a site plan that shows a 4m high wall on the northern end of the facility which will reduce the noise levels to the Golf Course only. Why is the only consideration for golfers who are only impacted for a short period but nothing for those of us who live within the vicinity of the proposed project.	The noise wall on the north-eastern sections of the site was recommended by the project noise consultants (Resonate) to mitigate noise levels for the dwelling to the east. Noting this submission, Flow Power proposes to construct the same height (4M) noise wall on the southern section of the development footprint. The site layout has been updated to reflect this. While noise modelling demonstrates full compliance, Flow Power proposes to introduce a noise wall the full length of the southern boundary of the Project footprint to further attenuate noise. With the inclusion of the southern noisewall, the noise levels at Mr and Mrs Linsell's property would be 36dB which is 9dB below the permissable EPA Noise Policy limits (night). The report prepared by Resonate Noise consultants is found the EIR - Attachment A8.	EIR Section 8.8; SEO Objective 6, 7

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39.0	Livestock	we run cattle and there is scientific evidence that rural animals can be impacted by ongoing noises which can impact their nurturing/milking of their young and in turn can impact their wellbeing. This will then impact our income from our cattle and therefore again disadvantaging us as landholders.	On the specific concern raised – the potential for ongoing noise to affect the nurturing/milking behaviour and wellbeing of cattle – Flow Power has had regard to the peer-reviewed literature on livestock noise tolerance published by the CSIRO: Kearton TR, Almeida A, Cowley FC, Tait LA (2024) 'Review of the potential impacts of freight rail corridors on livestock welfare and production', Animal Production Science. While this review considers freight rail noise rather than BESS , the dB thresholds relate to the physiological and behavioural tolerance of sheep and cattle to noise generally, rather than to the specific source of that noise, and are considered a reasonable and conservative basis for assessing this concern. The review finds: - typical ambient farm noise sits at approximately 34–35 dB; - noise becomes a stressor actively avoided by livestock at around 100 dB; - measurable production effects (reduced feed consumption, milk yield and milk release rate in dairy cattle) are associated with exposure around 105 dB; and hearing loss in sheep and other livestock is associated with exposure around 120 dB. The operational noise level predicted at the submitters' property, including the southern noise wall, is 36 dB, which is below the typical ambient farm noise baseline reported in the literature and substantially below the 105 dB and 120 dB thresholds associated with production and hearing effects respectively. On this basis, the Project's predicted operational noise levels are not expected to have a discernible effect on the wellbeing, nurturing/milking behaviour or productivity of livestock on the submitters' property. Operational noise compliance is committed under SEO Objective 7 (NV2), with a post-construction noise survey under Objective 6 to verify the modelled levels are achieved in practice.	EIR Section 8.8; SEO Objective 6, 7
40.0	Noise	Has their been consultation with each inmate at the Port Lincoln Prison about the noise impacts this will have on them. The prison is considered their home and their wellbeing needs to be taken into account.	Flow Power has actively engaged with Port Lincoln Prison and with the Department of Corrections more broadly including: 1. Inviting Operational staff to the community open day where Flow Power met with Prison Staff. 2. . Providing project information and contacts to both the Port Lincoln Prison and the Department of Corrections. 3. MS Teams meeting with the Department of Corrections to discuss the development and future access/egress point (easement) to be established on DoC land. 4. Provision of the EIR and SEO documentation to the Port Lincoln Prison managment and key contacts 5. Provision of the EIR and SEO to the Department of Corrections. Consultation is demonstrated in the EIR - Attachment A9. The prison buildings were also considered as receivers in the noise assessment completed by Resonate.	EIR Section 5, Section 8.8, App A.9; SEO Objective 6, 7
41.0	Noise	What is the process if the noise levels are breached? and how many times will a breach need to occur before the licence will be revoked? Should FLOW be fined for breaching the noise levels, will that fine be passed onto the landholders who are the ones impacted directly by that breach?	Flow Power will engage a qualified acoustic engineer to undertake operational noise assessments. The findings the noise assessments can be published on the project website. DEM is the appropriate authority to issue and manage infringements. Operational noise monitoring and compliance are committed through the SEO: Objective 7 (NV2) requires compliance with the Noise Policy and resolution of reasonable complaints, and Objective 6 includes a post-construction noise survey to validate the modelling. The thresholds, processes and consequences of any breach – including infringement and any licence action – are matters for DEM as regulator under the HRE Act. Flow Power would be the party subject to any enforcement, and would be required to ensure the project is brought into compliance, in the unlikley event of an exceedance.	SEO Objective 6, 7
42.0	Noise	Who is measuring the noise levels and when? If FLOW are measuring their own noise levels, how can we be assured they are not altered to remain within the allowed decibels. Noise levels should be measured independently from FLOW via a calibrated system installed at neighbouring properties to measure the noise levels to show when this exceeds the licence.	Noise monitoring will be undertaken by a qualified, independent acoustic consultant using calibrated noise loggers; the consultant captures and reports the data and is professionally obliged to report it factually. The monitoring and post-construction validation requirements are called up in the SEO (Objective 6 post-construction survey; Objective 7 operational compliance), and the records form part of compliance reporting under the Operational Environmental Management Plan.	SEO Objective 6, 7

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43.0	Visual impact	We are concerned of the visual impact this BESS will have on our current outlook from our home - no options as yet have ameliorated these concerns.	Flow Power has included 4m noise walls and a landscaping buffer on the southern side of the BESS equipment to ameliorate the noise and visual impact of the equipment. Landscaping will be undertaken in line with the requirements of the CFS comments. The noisewall and indicative landscaping are shown on the updated layout in the EIR- Appendix A1.	EIR Section 8.12; SEO Objective 11, 12 (VA1/VA2)
44.0	Visual impact	we have concerns that the BESS will visually impact from most of our property impacting any homes that may built in future developments. Our property has been considered for development for many years and this is a future option for us. The Premier has stated that housingis a major priority and this project will detrimentally impact this.	Should any future subdivision application be approved, Flow Power is committed to working together with our neighbours to develop an acceptable landscaping solution to help mitigate the project's impact on these new neighbouring properties. The South Australian Government also has a focus on renewable energy generation and storage, and its policy is that electricity generation would be sourced from net 100 per cent renewables by 2027. This project is constent with the State Government's Hydrogen Jobs Plan and new Hydrogen and Renewable Energy Act - key planks of the State Prosperity Project to support investments in renewable energy.	EIR Section 8.12; SEO Objective 11, 12 (VA1/VA2)
45.0	Visual impact	We have had discussions with FLOW regarding a green screen between the BESS and the outer lying areas of the property. We have noted a green screen will not cover the visual impact from higher up the hill, even if they install mounds to increase the height.	The visual impact assessment for the proposal makes provisions for landscaping to reduce visual impact. Should DEM grant a licence for the project, Flow Power anticipates that an on-site landscape plan be a condition of the licence, in line with the concept landscape plan shown in the EIR - Appendix A1. Flow Power remains open to provide landscaping at neighbouring properties should they wish to accept this offer. Landscape and screening treatments are committed in the EIR (Section 8.12) and SEO (Objectives 11 and 12 – VA1/VA2), including implementation and maintenance in accordance with the landscape concept plan. Optional landscaping treatments at the relevant viewpoints can be provided, and Flow Power remains open to designing and funding screening on the submitters' land to target the views that matter most to them.	EIR Section 8.12; SEO Objective 11, 12 (VA1/VA2)
46.0	Screening	any trees/shrubs will take 8-10 years togrow to a point they screen out theBESS. If FLOW water the trees in excess to increase the growth rate, the trees are likely to be weak and will fall over starting the process again. This does not therefore provide a suitable green screen to reduce visual impacts on neighbours, especially as much of the neighbouring properties look downward onto the project so trees will likely need to be significantly tall to screen.	Tube-stock screening takes time to reach screening maturity – this is a temporary, time-bound residual impact of the Project, acknowledged in the visual assessment (EIR Section 8.12). Mature trees are not preferred because they establish poorly and have lower survival rates. A landscape plan is committed under SEO Objectives 11 and 12 (VA1/VA2), which require establishment and appropriate ongoing maintenance of landscaping for the life of the project – including watering to a regime that supports healthy growth, weed management, and replacement of any unsuccessful plantings.	EIR Section 8.12; SEO Objective 11, 12 (VA1/VA2)
47.0	Screening	The EIR mentions current trees on theboundary fence, however, these have been ring-barked by car tyres that were put in place by the owner when planted -these trees are weak and are dying, thus providing no screening nor a suitable future option for screening.	Flow Power will investigate the health of these trees and, where their longevity is compromised, may remove them; any removal will first obtain the appropriate approvals, including any clearance required under the Native Vegetation Act 1991 (Native Vegetation Council) where applicable, and is managed through the CEMP (EIR Section 8.10). New landscape treatment at the BESS site is committed under SEO Objectives 11 and 12 and is intended to provide screening that does not depend on the condition of the existing boundary trees.	EIR Section 8.10, Section 8.12; SEO Objective 11, 12
48.0	Screening	FLOW have claimed we don't want agreen screen, however, we stated we wanted to ensure that the green screen was not just randomly planted and had consideration to placement, type of tree, maintenance of the trees, impact of the weather on them, fire risk. FLOW have manipulated conversations with affected landholders to make it look like we are not trying to find a solution.	To help respond to this point, a landscaping section along the southern boundary of the site has been added. The landscaping planting will be in full compliance with the requirements from CFS and if a licence is granted for the project, a landscape plan would be prepared. This would outline the detail of planting methods and the ongoing landscaping maintenance regime for the lifetime of the project, which would include managing weeds and replacing any unsuccessful plantings. EIR - Section 8.12 - Visual Amenity EIR - Appendix A1. A landscaping section has been added along the southern boundary, to be planted in compliance with CFS requirements, and a landscape plan is committed under SEO Objectives 11 and 12 (VA1/VA2) and EIR Section 8.12. That plan will set out planting method, species selection, fire-risk-compliant placement and the ongoing maintenance regime for the life of the project, including weed management and replacement of unsuccessful plantings.	EIR Section 8.12; SEO Objective 11, 12 (VA1/VA2)

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49.0	Land use	We have discussed with FLOW about the possibility that the remainder of the land not used by the BESS as a park thatcould then create a possible boundary to any future rural living developments, however, FLOW have stated they cannot enter into any commitments/agreements as they do not own the land the facility is proposed on. Why is it that FLOW and pick and choose which parts of a proposed development they engage with and which ones they don't rather than looking for real resolution/ideas to reduce the impact on neighbouring properties.	Flow Power is not able to make representations about future divisions to the land or neighbouring land. We note the land is currently zoned rurally. We remain open to engaging with neighbouring landowners in the event of approval of future rezoning or other future developments.	EIR Section 8.11
50.0	Fire Risk - thermal runaway	We have concerns if the BESS facility catches on fire, the thermal run-away will place us (as neighbours) at risk but also the broader issue for the City of Port Lincoln if the resulting fire continues to more populated areas of Port Lincoln.	The following commitments are made enforceable in the SEO: - To reduce the risk of a thermal runaway event the design and installation of an independent fire detection system, in addition to the Battery Management System that is expected to be inbuilt to each inverter battery module. - The fire detection system is to be maintained in accordance with the manufacturer's specifications and Ministerial Building Standard MBS 002 'Maintaining the performance of essential safety provisions'. Control and monitoring network communications within BESS yards is to be be designed and maintained such that they remain secure and reliable throughout the operation phase. - Completion of a fire safety study and fire risk management plan to determine the required safety clearances, radiant heat flux withstand requirements and firefighting methodologies during detailed design. EIR - Section 8.13 - Public Health & Safety EIR - Section 10 - Control and Management Strategies EIR - Appendix A1 - CFS compliant concept layout SEO - Table 2 - Objectives 4 & 5 (PH&S1 & PH&S2)	EIR Section 10 (PH&S1/PH&S2); SEO Objective 4, 5
51.0	Fire Risk	In FLOW's fire report, they are reliant onthe local CFS to respond to their facility if there is a fire. In the event on a thermal run-away, the batteries could explode causing the surrounding areas to catch alight. In the time it will take for the CFS to respond, gain access to the site, and start cooling or suppressing the fire, the fire would have travelled likely uphill towards the city of Port Lincoln thus potentially burning out many properties and homes along the way. In addition, the direction of a fire would be directly towards the proposed main entrance of the site thus reducing the CFS's ability to reach the main facility.	CFS have reviewed the EIR and SEO and made recommendations which Flow Power have incorporated. EIR Section 10 8.3 Public health and safety — CFS engagement EIR Section 10 PH&S1/PH&S2 control measures SEO Table 2 Objectives 4/5 (PH&S1/PH&S2).	EIR Section 10 (PH&S1/PH&S2), App A.1; SEO Objective 4, 5
52.0	Fire Risk	Any fire of this facility is likely to cause the access from Flinders Highway to be cut, thus increasing the time it will take for any emergency services to attend/respond. This places homes onthe outskirts of Port Lincoln at significant risk. Given there is a build up of pinesand other trees lining Flinders Highway, there is a risk this vegetation if alight will increase the likelihood of falling embers further into the city of Pt Lincoln and create a vegetation corridor for a fire to travel into Port Lincoln with little ability to extinguish it.	SACFS have assessed the proposal and made recommendations for any approval conditions to include: - Compliant APZs (updated site plan confirms compliance -EIR Appendix A1) - Perimeter roads meeting the required standards, including two (2) accesss points (updated site plan confirms compliance -EIR Appendix A1) The Project SEO further demonstrates Flow Power's obligations: SEO Table 2 Objective 4 & 5- Public Health and Safety (PH&S1 & PH&S2) with control measures including but not limited to: - Preparation of a Fire Safety Study & Risk Management Plan - Installation of an independent fire detection system, in addition to the Battery Management System that is expected to be inbuilt to each inverter battery module. The fire detection system should be maintained in accordance with the manufacturer's specifications and Ministerial Building Standard MBS 002 'Maintaining the performance of essential safety provisions'.	EIR Section 10 (PH&S1/PH&S2), App A.1; SEO Objective 4, 5
53.0	Water source	FLOW's fire report states they are relianton Little Swamp as a "permanent water source". This is evidence the author of the report has no knowledge of the local area as Little Swamp is dry for parts of the year including the period of fire danger season/summer.	The project will have dedicated 288Kl water storage on site and does not rely on Little Swamp as a water source. The bushfire report has been updated to reflect Little Swamp being dry periodically. EIR - Appendix A1 - Concept Layout EIR - Appendix A4 - Bushfire Risk Assessment	EIR App A.1, App A.4

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54.0	Fire risk	We have concerns with a propose greenscreen which may increase the fire risk to neighbouring properties if not managed properly. The SEO only mentions there will be a maintenance plan but no details are provided as to what this is or even what type of green screen is being proposed.	An Operational Environmenal Maintenance Plan (OEMP) is prepared for all Flow Power projects to manage vegetation and grass management (as well as other items). Vegetation management requirements would be developed as part of a landscaping plan and the specific maintenance requirements included in the OEMP. The landscaping screening will comply with CFS requirements to manage fire risk: A single row of trees and/or shrubs are permitted for screening purposes located no less than 10m from all infrastructure and not connected to other hazardous vegetation. Located no less than 10m from the access road. Shrubs shall not be planted under trees. Species with a single stem habit are preferred with the lower limbs removed to prevent them connecting with grassy understorey. Screening plants should have low flammability characteristics, be kept in optimum health, pruned regularly and any dead vegetation removed. EIR Section 10 Control and Management Strategies— Impact Events PH&S1/PH&S2: vegetation management requirements (CFS-compliant screening: 10m setback, single row, low flammability species, pruned, dead vegetation removed). EIR Section 4.3 Management Plans — OEMP to address vegetation and grass management. SEO Table 2 — Objective 13 Site Preparation Works (Weed Management) and Objectives 4 & 5 (PH&S1/PH&S2).	EIR Section 4.3, Section 10 (PH&S1/PH&S2); SEO Objective 4, 5, 13
55.0	Water runoff	The plans include a pit for storing anywater runoff in the event FLOW need to extinguish a fire on one of the batteries. Given BESS' cannot be put out with water, how big is this pit going to be in Litres as this is not clear.	A retention basin is included in the site layout and is able to capture at minimum 432,000L of water. EIR - Appendix A1 - Concept Layout showing 432kL retention basin.	EIR App A.1; SEO Objective 9
56.0	Fire risk	If a fire was to occur, any water that isnot FULLY captured and contained in a pit will enter the underground water aquifer- which is illegal. The EIR has assessed this as unlikely and notes the groundwater levels are too deep to be impacted. the Dept for Environment and Water have been clear in past development applications that there is to be NO impact of potentially contaminated water entering an underwater system -this is why feed lotting of cattle is prohibited from this area due to'potential' risk.	Contaminated firewater will be managed in accordance with EPA and SA Water guidance (Environment Protection Act 1993 and Environment Protection (Water Quality) Policy 2015), and removed by a licenced liquid waste contractor to an approved facility as required. EIR Section 8.7 'Surface water EIR Section 10 Control and Management Strategies— 'Flood and Surface Water Mitigation' sub-section, in particular 'Environmental Consequences of Flooding' (potential mobilisation of contaminants in unlikely event of flood coincident with infrastructure damage or spill). EIR Appendix A.2 (ELA hydrology assessment, 2025). SEO Table 2 —Objective 9 - Surface Water (Operational Phase) to ensure no significant disturbance to surface drainage patterns and no adverse impaccts to surface water and groundwater quality or quantity during the operational phase, with control measures including but not limited to: - Maintain stormwater system in accordance with the Stormwater Management Plan to appropriately manage surface runoff and discharge from impervious areas such as the BESS. - The drainage system for the regulated activity (BESS) is operated and maintained to appropriately manage all stormwater flows and water quality. -Groundwater dependent ecosystems are avoided. Management of waste water will be included in the project OEMP.	EIR Section 8.7; SEO Objective 9, 23
57.0	Land use	Our property has been included in discussions and past applications from the DCLEP for subdivision of this land for rural living. This BESS will impact our ability to sell the allotments due to noise and visual impacts and we should be fairly compensated for this loss of future development opportunities.	Through consultation with landowner to the south, it's understood that the subdivision of 363 Flinders Highway, Duck Ponds, SA was not approved. PLAN SA does not show any current applications and the Department of Housing and Urban Development have confirmed this.	EIR Section 8.8, Section 8.12; SEO Objective 6, 7, 11, 12
58.0	Land use	we have owned this land since 2000, our children have grown up on this property, therefore they have a right to the future enjoyment of this land as this is their home. Should they wish, they should have the ability to subdivide to build their own homes on this land as a generational investment without the risk of visual/noise impacts.	Noted.	

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59.0	Consultation	FLOW sent us an email dated 13/2/2026,stating the EIR and SEO are available to view as part of the public consultation,they have embedded a link https://www.energymining.sa.gov.au/ptlincoln-bess, however when you follow the link,the page is not found. How can the public comment on something they cannot access -	The consultation link provided by DEM was made live at the commencement of the public consultation period, which began on Saturday 14 February 2026.	
60.0	Technical reports	It is of concern the only documents that are available for public consulation/consideration are those prepared by and submitted by FLOW. These documents would be heavily skewed in the favour of FLOW as they are keen to build this facility. There needs to be a balanced view of pros and cons to this type of facility for community consideration.	Noted. Flow Power has prepared the project documentation based on the requirements of the relevant legislation and regulations. The Department of Energy and Mining have thoroughly reviewed these documents throughout the application process and requested additional information to ensure application requirements were met.	
61.0	Benefit agreement	We received an email from FLOW on 19/9/2025 as part of our ongoing communication to raise our concerns about this project, in this email, FLOW reference offering us a Neighbour Benefit Agreement. They state When Flow Power develops an energy project, we are committed to delivering benefits in the communities we work. To acknowledge the potential visual impact as well as potential disruption during construction, Flow Power would like to offer a Neighbourhood Benefit Scheme through a combination of annual payments and a one-off payment up front during construction if the project goes ahead. We've put something together and would really appreciate your thoughts on this. The offer includes: An annual payment of 2,000 per year (starting in line with operations) for the life of the project (20 years). This payment increases with CPI annually. A 5,000 payment in line with commencement of construction.This offer is voluntary and completely up to you. This offer does not stop you from voicing concerns or raising complaints to Flow Power at any stage of the project. The agreement asks you to refrain from formally objecting to the project to the state government." We are highly offended that FLOW only view our visual impact as being valued at 2000 per year and are also highly offended if we are to accept this offer, that we are to 'refrain from formally objecting to the project to the state government'. We take this to be likened to a bribe for our silence.	Noted. Flow Power has prepared the project documentation based on the requirements of the relevant legislation and regulations. A voluntary neighbourhood benefit offer is outside the remit of the HRE Act and the HRE Regulations. The Neighbourhood Benefit Offer is a consistent approach to all Flow Power projects developed and built to date and not bespoke to this project. The offer remains voluntary.	EIR Section 8.8, Section 8.12; SEO Objective 6, 7, 11, 12

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62.0	Benefit agreement	In phone conversations with FLOW, theProject Development Officer stated FLOW would not provide an offer to landholders impacted, however, would consider one if submitted by a landholder. We provided aproposal to FLOW on 20/12/2025 including what we believed was a fair justification of the future impact on development of the land, including 2 properties on the market of similar value to our land. FLOW responded on 15/2/2026 declining the offer, maintained their existing offer of the neighbourhood payment (which included us having to refrain from formally objecting to the project) and noted they would discuss with the DCLEP a community benefit fund - this is in no way working with us as the most affected by this project. The DCLEP main site is Cummins (76kms) away from the BESS facility. Again this appears tobe 'bribing' the DCLEP to approve the project going ahead without genuine consideration of the impact to direct neighbours to the project.	Community Benefit Funds are a consistent approach to all current Flow Power project developments, and are designed based on best practice set by governments and regulatory bodies such as the Clean Energy Council. Community Benefit Funds are often intended to benefit the communities close to where a project is built (e.g., Port Lincoln). Flow Power has extended a Neighbour Benefit Offer to close neighbours. The Neighbour Benefit Offer is separate to Community Benefit Funds. Flow Power will continue to extend the Neighbour Benefit Offer to close neighbours regardless of if objections were made or not.	
63.0	Social - Jobs	The EIR states "The Project will alsoprovide much needed jobs for Port Lincoln and the Lower Eyre Peninsula during the construction phase", however there is no documentation to support this claim, nor does the documents indicate how many this will be. In conversations with FLOW, they have repeatedly stated they will not commit to agreeing to any local businesses being involved as they don't own the land and as Tier 1 project, this decision is up to the major contractor once engaged - therefore there is no guarantee that any 'locals' will be employed or contracted on this project.	Flow Power will not formally engage contractors ahead of a licence/approval being granted. After the Department's decision, and if the decision is an approval, Flow Power remains committed to using local workforce following the appointment of a principal contractor. The appointment of a principal contract cannot take place until the project has received an approval. Anticipated workforce numbers for the construction period of the project are included in: EIR Section 8.14 outlining a base case of: - 84 full time equivalent (FTE) jobs during construction - Supply chain effect being 100 FTE - Consumption effect being 50 FTE - Total effect on regional and SA economy being 234 FTE.	EIR Section 8.14 (Table 6)
64.0	Social Impact	In a conversation with x2 wardens from Pt Lincoln Prison, they have not had any communication about the BESS project (either via FLOW directly, Dept of Mining or internally). This raises concerns for the ongoing wellbeing of the prisoners and the staff who will be highly affected by the noise emitted from the project. Also of concern is a major stakeholder that may not have received any information about the project.	Flow Power has actively enaged with Port Lincoln Prison and with the Department of Corrections more broadly including: 1. Inviting Operational staff to the community open day where Flow Power met with Prison Staff 2. Providing project information and contacts to both the Port Lincoln Prison and the Department of Corrections 3. MS Teams meeting with the Department of Corrections to discuss a future access/egress point (easement) to be established on DoC land. 4. Provision of the EIR and SEO documentation to the Port Lincoln Prison management and key contacts 5. Provision of the EIR and SEO to the Department of Corrections	EIR - Appendix A.9;
65.0	Traffic	The EIR indicates the main entrance will be via Flinders Highway. during construction this will cause significant obstructions to traffic given that much of the area of Boston use this to enter Pt Lincoln of a morning and after school/work as Lincoln Highway is very congested. The entrance is partially obscured to traffic as well as those entering and exiting the site with risk of slow moving traffic coming in an out of the project area.	Primary access to the site is from Western Approach Road (B100) servicing Pound Lane where the access point is. Western Approach Road carries an estimated 1,900 vehicles per day (AADT), 20% of which are heavy vehicles. Pound Lane carries 291 vehicles per day (2025). A traffic impact assessment has been undertaken by a qualified Traffic Engineer and concludes that the existing road network can sufficiently and safely accomodate the construction traffic associated with the project. The requirement to prepare and implement the TMP is committed to in the SEO (Objective 10 – T1) to manage temporary impacts to the road network and site access in line with the Department for Infrastructure and Transport comments.Its detailed preparation is required to be prepared prior to construction- when contractor methodology, staging and final vehicle volumes are known. The Department for Infrastructure and Transport notes that it supports this project.	EIR Section 8.13; SEO Objective 10 (T1)
66.0	Land use	This project, by being adjacent to our land, is likely to impact future development opportunities due to the visual and noise impacting on the landholders enjoyment of their own property. Given primary producers have limited superannuation options, the ability to sub-divide has always been an option to self fund retirement and this will be unfairly impacted by the project.	Noted. Flow Power has prepared the project documentation based on the requirements of the relevant legislation and regulations.	

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9			Lower Eyre Council	
67.0	Pest weed	The proposed development is located within an area that has identified pest weed (African Boxthorn) as per the ecological assessment undertaken by Eco Logical Australia. It is strongly encouraged appropriate measures and conditions are put in place to minimise the risk of spread, and appropriate clearance/treatment of the area be undertaken prior to construction commencing.	The Project SEO accounts for the presence of African Boxthorn in the region and includes control measures which would be implemented as part of the Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP). Specifially the SEO lists thee performance criteria and control measures: Objective 3- Native Flora and Fauna (ID: NFF1) and; Objective 13 - Site Preparation Works (Weed Management)	SEO Objective 3 (NFF1) & 13 (Weed Management)
68.0	Fire risk	Understanding the facility creates an inherent fire risk, consideration should be given to appropriate facilities and infrastructure to help reduce the potential spread of any fire, e.g. firefighting equipment or fire-retardant chemicals stored on site. Council anticipates this information will be provided at a later stage as part of a Fire Management Plan during the Stage 3 of the licensing and approvals.	Noted and Flow Power welcomes this recommendation. In addition to this, Flow Power will comply with CFS requirements regarding design inputs and requisite fire fighting equipment to be stored on site. A comprehensive Fire Safety Study by a qualified specialist Fire Engineering consultancy will be undertaken to inform detailed site design. As will all of our projects, Flow Power will continue to consult with CFS throughout the design, construction and operation of the Project. The Project SEO further demonstrates Flow Power's obligations: Objective 4 - Public Health and Safety (PH&S1) with control measures including but not limited to: - Preparation of a Fire Safety Study & Risk Management Plan - Installation of an independent fire detection system, in addition to the Battery Management System that is expected to be inbuilt to each inverter battery module. -The fire detection system should be maintained in accordance with the manufacturer's specifications and Ministerial Building Standard MBS 002 'Maintaining the performance of essential safety provisions'. The the SACFS Renewable Energy Facilities Guide is now referenced and a CFS-consultation criterion has been added to SEO Objectives 4 and 5. Objective 5 (PH&S2 – external bushfire) specifically addresses fire originating from the surrounding landscape and the associated controls (APZ, firefighting water supply, CFS access).	SEO Objective 4, 5 (PH&S1/PH&S2)
69.0	Traffic	Access is proposed via Pound Road, which is a semi sealed road, confirmation of construction methodology should be considered to limit large vehicle access via this road. Alternatively upgrades to impacted roads should be undertaken to support development and construction. Confirmation should also be provided regarding access through existing free hold land, if there is an existing right of way established. There is no information on traffic type and volume for either construction or future servicing in the development submission. It can be accepted that Pound Lane is not fit for Restricted Access Vehicle (RAV) access other than infrequent occasional use under permit. The pavement condition would not support Higher Mass Limit (HML) use. The 2025 traffic counter returned 291 vehicles per day, up from the 244 mentioned in the submission. Council has no long-term intention of upgrading this road in the foreseeable future, either to make the full-length bitumen or suitable for HML.	The SEO requires the Project will prepare a Traffic Management Plan (TMP) which will detail quantity of vehicle type and movements to and from the site: Objective 10 - Traffic and Transport (T1). Flow Power notes that the Department for Infrastructure and Transport supports the proposal subject to the following conditions: 1. Prior to construction, a 'Construction Traffic Management Plan (CTMP)', shall be prepared to the satisfaction of the Commissioner of Highways. The TMP shall address matters including, but not limited to the following: a) Traffic volumes, distributions, routes and types of vehicles to be used in the construction phase of the development. b) A Traffic Management Plan (TMP) for each phase of construction of the development, including any road and access changes and any proposed upgrades and/or closures. The TMP shall also show all traffic devices to be utilised (including variable message signs) and any proposed traffic restrictions. The applicant shall notify DIT's Traffic Management Centre (TMC) – Roadworks gain approval for any road works, or the implementation of a traffic management plan during the construction phase. Before any construction works the contractor(s) shall complete a 'Notification of Works' c) Managing impacts to infrastructure within the road reserve. All vehicle movements shall be undertaken in accordance with the TMP. In addition to the preparation of a TMP, a full pre-construction dilapidation survey will be undertaken. Post construction, a full assessment will again be undertaken and condition of the road restored if there is any impact on the road as a result of the Project Flow Power also welcome consultation with Lower Eyre Council during the preparation of the Project TMP. EIR Section 8.13 updated to reflect 2025 vehicle count. EIR Appendix A7 Traffic Impact Assessment updated to reflect 2025 vehicle count. The Traffic Impact Assessment prepared by RPS (EIR Appendix A.7) concludes that the existing road network, including Pound Lane, can adequately and safely accommodate the construction and operational phase traffic associated with the Project. A Traffic Management Plan (committed to in SEO Objective 10 – T1) will be prepared to manage construction-phase traffic, including vehicle types, movements, routing and temporary speed reductions, in consultation with Council. The plan will include pre-construction dilapidation.	SEO Objective 10 (T1)
70.0	Noise	Acoustic report highlights 4m acoustic barriers and suggest spilt level benching. Confirmation should be provided to demonstrate spilt level benching will be incorporated to as per acoustic requirements. This earthworks design will also assist in limiting the impact of scaring to the land.	Flow Power confirms the 4m acoustic barrier will be constructed in line with the benching levels. Flow Power will provide the civil drawings during detailed design to confirm benching and acoustic wall heights. EIR - Section 8.8 - Noise & Vibration EIR - Appendix A1 - Concept Layout EIR - Appendix A8 - Environmental Noise Assessment	EIR Section 8.8, Appendix A.1, Appendix A.8

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10			**Department for Environment and Water**	
71.0	Biodiversity - Native Fauna	The assessment must acknowledge NPW Act and EPBC listed species records within 5km and 500m of the site, specifically Yellow-tailed Black Cockatoos, and address indirect impact risk from vehicle movement. Driver induction and fauna sighting reporting must be included.	The desktop assessment has identified a number of known records of NPW Act and EPBC Act listed species within 5 km and within 500 m of the project site. Of particular note, Yellow-tailed Black Cockatoos (Calyptorhynchus funereus; NPW Act listed as Vulnerable) are recorded in the vicinity of the site, with records associated with proximity to Little Swamp, a waterbody located approximately 600 m north-west of the project site. Whilst no NPW Act listed native fauna is considered likely to be present on the project site itself due to the predominantly cleared pasture habitat and absence of suitable nesting or foraging resources, the potential for transient bird and bat species to access or move through the site cannot be excluded. Indirect impact risk to listed species from Project activities is considered low; however, the potential for fauna disturbance via vehicle movement on site access routes has been identified as a pathway requiring management. To address this, the EIR and SEO have been updated to include the following measures: • Driver induction requirements for all construction and operational staff and contractors, including awareness of listed species in the locality and obligations under the NPW Act. • A fauna sighting reporting protocol, requiring all personnel to report sightings of native fauna on or adjacent to the site to the Environment Manager or equivalent. EIR Section 8.10 Native flora and fauna EIR Section 10 Control and Management - 'Native Fauna Management', 'Vehicle Movement SEO Table 2 — Objective 3 (NFF1) control	EIR Section 8.10, Section 10; SEO Objective 3 (NFF1)
72.0	Groundwater	The EIR must confirm the site's location within the Southern Basins Prescribed Wells Area (SB PWA), note the existing borehole on site, and state that any dewatering or consumptive use of underground water requires authorisation under the Landscape South Australia Act 2019.	Flow Power confirms that no underground water use is currently anticipated for this Project. Should this position change during detailed design or construction, the applicant will contact the DEW Water Licensing Branch prior to any such use commencing. The following sections of the EIR and SEO have been updated to reflect DEW comments: EIR Section 8.6 Groundwater EIR Section 10 - Flood & Surface Water mitigation updates	EIR Section 8.6
73.0	Watercourses	The EIR must confirm there are no watercourses on site and address potential impacts to Little Swamp as a nearby sensitive waterbody.	No defined permanent surface water features, including watercourses or water bodies, are located within the project site boundary (SA WaterConnect, accessed 3 June 2025). Two first-order ephemeral flow path features have been delineated within the site using high-resolution topographic survey data and validated by field observation (Eco Logical Australia, 2025). Little Swamp, a high potential aquatic wetland and groundwater dependent ecosystem (GDE), is located approximately 600 m north-west of the project site and represents the primary downstream surface water receptor. Surface water runoff from the site drains generally north-west towards Little Swamp via the ephemeral flow paths identified. Potential impacts to Little Swamp from Project activities are addressed in the Potential Impacts and Mitigation Measures sections of this EIR. EIR Section 8.7 Surface water EIR Section 10 - Flood & Surface Water mitigation updates	EIR Section 8.7, Section 10
74.0	Flood risk	The EIR must confirm the basis for the low flood risk conclusion, reference the datasets used, and confirm current flood overlay mapping has been reviewed.	Flood risk at the project site has been assessed by Eco Logical Australia (2025) based on site topography (0.1 m resolution site survey, dated 27 June 2025), regional terrain data (SRTM 1-second DEM, ELVIS), rainfall records (BoM station 018205) and mapped drainage features (SA WaterConnect). Current flood hazard overlay mapping for the site area has been reviewed and is consistent with the findings of the assessment. The site is characterised by undulating topography with an average gradient of approximately 6.1%, draining from a high point of approximately 126 m AHD in the south-east to a low point of approximately 98 m AHD in the north-western corner. No defined watercourses are present within the site. Two ephemeral flow path features have been identified, draining towards Little Swamp to the north-west. Considering the site topography, ephemeral and internally draining nature of surface drainage, and absence of defined watercourses, the likelihood of significant flooding at the site is considered very low. This assessment has been undertaken having regard to Australian Rainfall and Runoff (2019) principles, including consideration of climate change impacts on future rainfall intensity and runoff behaviour. Refer to the Hydrology Assessment (Eco Logical Australia, 2025) for full details. EIR Section 8.7 - Surface water EIR Section 10 - Flood & Surface Water mitigation updates including confirmation of data sets. SEO Objective 23 (SW3 – Flooding) updated and requires a detailed flood risk assessment prior to the commencement of construction, assessing at least the 1% and 2% AEP events using the most recent available data and considering current and future flood risk in accordance with Australian Rainfall and Runoff (2019) (including the August 2024 update to Book 1, Chapter 6) and climate change scenarios.	EIR Section 8.7, Section 10; SEO Objective 23 (SW3)

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75.0	Heritage	The EIR must confirm no known heritage impacts on or near the site, note the low risk of encountering archaeological features, and confirm measures are in place to protect any heritage values found during the project's 20-year life.	A Desktop Heritage Assessment has been undertaken for the project site (refer EIR Appendix A.5). The assessment confirms there are no known non-Aboriginal heritage places, objects or sites recorded on the project site or within close proximity. Whilst the risk of encountering archaeological features of potential significance during Project activities is considered low, the project site has not been subject to archaeological survey and the possibility of subsurface heritage deposits cannot be entirely excluded, particularly given the 20-year operational life of the Project. Measures to identify, protect and manage any historical archaeological features encountered during any stage of the Project have been incorporated into the EIR and SEO, and are detailed in the Mitigation Measures section below. EIR Section 8.4 Heritage Aboriginal and non-Aboriginal EIR Appendix A.5 IHC Desktop Heritage Assessment	EIR Section 8.4
76.0	Grey-headed Flying Foxes (GHFF) - Fencing	The EIR must address the risk of GHFF entanglement in high-security fencing, particularly high-tensile wire. The species must be considered in project design and risk management despite not being currently established in southern Eyre Peninsula.	This comment has been updated in EIR Section 8.10. GHFF entanglement risk is managed through the fencing design measures in EIR Section 10 (Native Fauna Management). High-security perimeter fencing is proposed for the BESS development footprint. In areas nearby to the project site, high-tensile wire fencing has been associated with entanglement and mortality of GHFF. This risk has been identified as a potential impact pathway and has been incorporated into the project's design. EIR Section 8.10 Native flora and fauna— updated to include DEM referenced fauna EIR Section 10 — 'Native Fauna Management / Fencing' . SEO Table 2 — PH&S and NFF1 - OEMP.	EIR Section 8.10, Section 10
77.0	Lighting - Cummulative Impacts on Fauna	The EIR must address the cumulative light environment and potential impacts of operational lighting on NPW Act listed birds and EPBC listed migratory shorebirds using Little Swamp, specifically the Common Greenshank and Sharp-tailed Sandpiper.	The cumulative-lighting/migratory-shorebird content updated in EIR Section 8.10. Lighting mitigation is set out in EIR Section 10 (Lighting – Migratory Shorebirds). EIR Section 8.10 'Native flora and fauna' updated to include— Common Greenshank, Sharp-tailed Sandpiper and cumulative lighting paragraphs. EIR Section 10 — 'Lighting' updated to include Migratory Shorebirds (AS 4282:1997, shielded luminaires, post-construction audit). SEO Table 2 — Objectives 11 (VA1) and 12 (VA2): updated to show assessment criteria reference AS 4282-1997. SEO Table 2 — Objective 17 (NFF4): updated to include 'Minimise light during operational phase to avoid cumulative impact'.	EIR Section 8.10, Section 10
78.0	Fauna Permits	The EIR must note that permits are required under South Australian legislation to catch, move, relocate or destroy any protected animal or eggs during any stage of the project.	This requirement will be incorporated into all relevant management plans, including the Construction Environmental Management Plan (CEMP) and Operational Management Plan (OMP). EIR Section 8.10 Native flora and fauna— updated to reflect DEW feedback on protected animal/eggs capture, relocation or destruction & required permits EIR Section 10 — Native Fauna Management - updated to reflect injured Fauna updates SEO Table 2 —updated and reflected in NFF5 control measures and permit requirements implemented in CEMP/OEMP.	EIR Section 8.10, Section 10

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79.0	Heritage	Despite low risk, the EIR must include measures for unexpected heritage discovery, including a stop-work procedure, engagement of an archaeologist, and immediate reporting to DEW. A heritage impact assessment must be completed and the CEMP/OMP updated accordingly.	Despite the low assessed risk of encountering archaeological features of potential significance, the following heritage risk mitigation measures are incorporated into the EIR and all relevant management plans: 1. Completion of a supporting heritage impact assessment prior to construction commencement. 2. Development of a Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP) incorporating the following project-specific heritage management measures: a. All workers and contractors to undergo site inductions covering obligations in relation to historical archaeology and the Heritage Places Act 1993. b. Implementation of an Unexpected Historical Archaeological Discovery Procedure: upon discovery of any potential archaeological feature, all work in the immediate vicinity must cease; an archaeologist must be engaged to assess the significance of the find; works must not recommence until authorisation is received from the archaeologist and, where required, from DEW. c. Immediate reporting to DEW if any site or object of potential heritage significance is disturbed without appropriate permit or approval. d. Reporting to DEW of any other event where unknown historical heritage is discovered during any Project phase. EIR Section 8.4 'Heritage (Aboriginal and non-Aboriginal)' — heritage risk mitigation. SEO Table 2 — Objective 1 (AH1 Aboriginal Heritage): control measure 'Establish an unexpected finds protocol and include in the CEMP. All works stop in the vicinity of the Aboriginal heritage discovery.'	EIR Section 8.4; SEO Objective 1 (AH1)
80.0	NV, fauna, GHG emissions, heritage	Three additional or amended objectives must be added to SEO Table 2: (a) no clearance of native vegetation or disturbance to native fauna without prior approval; (b) minimise GHG emissions across all project phases; (c) no damage to Aboriginal or non-Aboriginal heritage without authorisation.	The following objectives added or amended in SEO Table 2 to reflect DEW comments: OBJECTIVE 1 – Native Vegetation and Native Fauna No clearance of native vegetation or disturbance to native fauna unless prior approval under the relevant legislation has been obtained, including under the Native Vegetation Act 1991, National Parks and Wildlife Act 1972, and any other applicable legislation. Assessment Criteria: • No native vegetation cleared without NVC approval. • No protected fauna disturbed, relocated or destroyed without a valid DEW permit. • Zero reportable incidents involving unlawful disturbance to native vegetation or fauna. Leading Performance Indicators: • Pre-clearance surveys completed and NVC advice obtained prior to any ground disturbance. • Fauna management induction completed by all staff prior to site access. • Fauna sighting register maintained throughout construction and operation. OBJECTIVE 2 – Greenhouse Gas Emissions Minimise greenhouse gas emissions during construction, operation, decommissioning and rehabilitation phases of the Project as far as is practicable. Assessment Criteria: • GHG emissions from construction, operation and decommissioning are identified, quantified and minimised through selection of materials and methods with reduced embodied emissions. • Materials with high recycled content used where practicable (steel, copper, road base, etc.). • Waste management approaches maximise recycling and reuse of construction and demolition materials. Leading Performance Indicators: • GHG assessment completed at detailed design phase. • Materials selection criteria documented in CEMP. • Waste Management Plan developed prior to construction commencement. OBJECTIVE 3 – Aboriginal and Non-Aboriginal Heritage No damage, disturbance or interference to Aboriginal heritage or non-Aboriginal heritage sites, objects, remains or places unless authorised under the relevant legislation, including the Aboriginal Heritage Act 1988 and Heritage Places Act 1993. Assessment Criteria: • Zero reportable incidents involving unauthorised disturbance to heritage sites or objects. • Any unexpected heritage discovery managed in accordance with the Unexpected Discovery Procedure in the CEMP/OMP. • Immediate notification to DEW of any heritage disturbance without appropriate authorisation. Leading Performance Indicators: • Heritage impact assessment completed prior to construction. • All workers inducted on heritage obligations prior to site access. • Unexpected Discovery Procedure included in CEMP and OMP. The amended objectives are clarified as: Objective 15–18 = Native Flora and Fauna (NFF2–NFF5); Objective 19 = Native Vegetation (NV1); Objective 20 = Heritage (H1); Objective 21 = Greenhouse Gas Emissions (GHG1); Objective 22 = Climate Change (CC1); Objective 23 = Surface Water (SW3).	SEO Table 2, Objective 15–23

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81.0	Fauna	Mitigation measures must address management of native fauna including risk of vehicle collision, fencing entanglement, and injured fauna. DEW permit requirements must be incorporated. Management plans must include fauna injury assessment and response procedures.	The following native fauna mitigation measures required by DEM are to be incorporated into the CEMP and OEMP, and are outlined in the EIR & SEO: EIR Section 10 - Native Fauna Management - Vehicle Movement: • All construction and operational staff and contractors to complete a fauna awareness induction prior to site access, including identification of NPW Act and EPBC Act listed species recorded in the locality (including Yellow-tailed Black Cockatoos, GHFF, Common Greenshank and Sharp-tailed Sandpiper) and obligations under the NPW Act. • Site speed limits to be enforced on all internal access tracks to minimise the risk of fauna collision. • A fauna sighting register to be maintained, with sightings of listed or notable species reported to the Environment Manager within 24 hours. EIR Section 10 - Fencing: • Perimeter fencing design to be reviewed at detailed design phase to minimise the risk of GHFF entanglement. Where high-tensile wire is proposed, alternatives or modifications (e.g. visibility markers, fencing height and configuration adjustments) shall be considered in accordance with current best practice guidance for GHFF-compatible infrastructure. • Fencing to be regularly inspected for evidence of fauna entanglement throughout the operational phase, with any entanglement incidents immediately reported and responded to. EIR Section 10 - Injured Fauna: • Should any native fauna be found injured on or adjacent to the project site, the Environment Manager is to be notified immediately. Response procedures in accordance with DEW's living-with-wildlife guidance and relevant codes of practice for humane destruction of wildlife (refer Assessment Criteria section) are to be followed. • A DEW permit must be obtained prior to any capture, relocation or destruction of protected fauna. Permit applications: https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/capture-release SEO Table 2 - impact Events NFF1 and PH&S1/PH&S2 included in the CEMP/OEMP Fauna mitigation content has been updated in EIR Section 10, and the original agency comment placed in the agency-comment column. Mitigation measures (vehicle movement, fencing, injured fauna, DEW permits) are in EIR Section 10 (Native Fauna Management) and reflected in the SEO fauna objectives.	EIR Section 10; SEO Objective 15–19
82.0	Light spill	Mitigation measures must minimise light spill and skyglow during the operational phase to reduce cumulative impacts on migratory shorebird values at Little Swamp.	The following measures updated to reflect DEW comments: EIR Section 10 • Operational lighting design to comply with AS 4282:1997 – Control of the Obtrusive Effects of Outdoor Lighting, as committed to in the EIR. • Lighting to be directed downward and inward where practicable, using shielded or full cut-off luminaires to minimise light spill beyond the project footprint. • Lighting intensity and hours of operation to be minimised to that necessary for safety and security, with motion-sensing or programmable controls used where practicable to reduce unnecessary illumination during low-activity periods. • Vegetative buffering, as proposed in the Visual Impact Assessment, to be implemented and maintained to assist in screening light from the Little Swamp direction. • A post-construction lighting audit to be undertaken within 12 months of operational commencement to confirm compliance with AS 4282:1997 and to identify any additional mitigation required to address light spill towards Little Swamp. • Any lighting changes during the operational phase to be assessed against potential impacts on migratory shorebird values at Little Swamp prior to implementation. SEO Table 2 — Objectives 11 &12 (VA1/VA2) reference AS 4282-1997.	EIR Section 10
83.0	Flood	Flood and surface water mitigation measures must be updated to address climate change, reference ARR 2019, and ensure current flood hazard data has been used. Refer to detailed flooding rows prepared separately.	Detailed EIR update for the following which collectively address DEW's requirements for flood and surface water: EIR Section 10 • EIR – Datasets and Methodology Statement • EIR – Climate Change Statement • EIR – Design Response to Flooding • EIR – Environmental Consequences of Flooding These updates address: use of current datasets and flood hazard overlays; ARR 2019 methodology; climate change consideration; infrastructure design response; and environmental consequences including erosion, sediment transport and contaminant mobilisation. EIR Section 8.7 Surface water— (ARR 2019 reference). SEO Table 2 — Objectives 8 (SW1) and 9 (SW2): Stormwater Management Plan, EPA dewatering guideline, hydrology mitigation per ELA (2025). The EIR has been amended to state that dewatering is not anticipated and that, where required, it would be undertaken in accordance with the EPA dewatering guideline and the Landscape South Australia Act 2019.	EIR Section 8.6, Section 10 (SW1)

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84.0	GHG emissions	The EIR must address: minimising whole-of-life GHG emissions; use of low-embodied-carbon materials; waste minimisation and recycling; and a climate change risk assessment covering heatwaves, storms, flooding, bushfires and extreme wind. These must be reflected in the SEO.	The following climate change measures are incorporated into the EIR and SEO: EIR Section 10 — Climate Change Mitigation (GHG and Severe Weather) sub-section: • GHG Emissions • Climate Change Risk Assessment (heatwaves, storms/flooding, bushfire, extreme wind for the 20-year operational life). SEO Table 2 — PH&S1/PH&S2 (bushfire/thermal runaway) & SW1/SW2 (flooding/stormwater) which also reference mitigation measures in the OEMP.	EIR Section 10; SEO Objective 4, 5, 8, 9 (PH&S1/PH&S2/SW1/SW2)
85.0	Wildlife	The SEO must include 'Applicable Non-Legislated Standards' referencing DEW's codes of practice for humane destruction of wildlife, DEW living-with-wildlife guidance, and species-specific information for relevant fauna including GHFF, snakes, possums, wombats and little corellas.	The DEW codes of practice for the humane destruction of wildlife and the DEW living-with-wildlife guidance are referenced in the SEO native-fauna assessment criteria. Codes of Practice – Humane Destruction of Wildlife (DEW): • Native Birds • Wombats • Common Brushtail Possum • Flocking Birds: • Kangaroos and Wallabies Where no relevant code of practice is available on the DEW website, the Animal Welfare Act 1985 is to be referred to. Living with Wildlife Guidance (DEW) – referenced in: EIR Section 4.3 relevant management plans SEO Table 2 — Incorporated under 'Applicable Non-Legislated Standards' for Impact Event NFF1.	SEO Table 2 (fauna objectives)
86.0	GHG emissions	The SEO must include assessment criteria and control measures for GHG emissions and climate change risks including flooding, bushfires and extreme wind across the duration of the project's life.	The following assessment criteria for climate change updated: EIR Section 10 — Climate Change Mitigation (GHG and Severe Weather) full assessment criteria/leading indicators in GHG and Climate Change Risk Assessment. SEO Table 2 — controls/criteria flow through PH&S1, PH&S2, SW1, SW2; dedicated Climate Change SEO	EIR Section 10; SEO Objective 4, 5, 8, 9, 22 (PH&S1/PH&S2/SW1/SW2/CC1)
87.0	Flood	All DEW flood requirements addressed in the separate flooding update table prepared by DEW.	All flood-related EIR and SEO updates has been addressed to comply with DEW comments: EIR Section 8.7 'Surface water' (existing-environment flood risk paragraphs) EIR Section 10 — 'Flood and Surface Water Mitigation' sub-section SEO Table 2 — Objectives 8 (SW1) and 9 (SW2) 'Surface Water'.	EIR Section 8.7, Section 10; SEO Objective 8, 9 (SW1/SW2)

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88.0	General	The Department for Environment and Water (DEW) notes and recommends the following: Biodiversity • the existing environment and biodiversity values have been sufficiently identified in the desktop assessment, noting a site assessment was carried out on 4 June 2025 to identify native vegetation in accordance with the NV Act and habitat suitable for threatened biota listed under both NPW Act and the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Native Fauna • The applicants assessment is correct which identified that no native fauna listed under the NPW Act was likely to be present on the proposed project site and unlikely to occur due to lack of habitat although there may be bird or bat presence that needs to be addressed in terms on native fauna management (see further details under Mitigation Measures and Assessment Criteria headings below). • There are a number of known records of several NPW and EPBC listed species within 5km and within 500m, some of which relate to the proximity to a waterbody (Little Swamp) north-east of the proposed project site, including the known regionally critical Yellow-tailed Black Cockatoos (NPW Act listed as Vulnerable). Whilst indirect impact risk for bird and bat species is low, DEW advises that the EIR and SEO need to include measures to ensure that potential impact event of fauna disturbance via pathway vehicle movement etc are mitigated by driver induction and reporting sightings with a low level of risk (see details in sections below). Water Resources Groundwater • The project site is partially located within the Southern Basins Prescribed Wells Area (SB PWA) (the larger eastern portion of the land) where any dewatering of underground water from trenches or excavations within the SB PWA requires an authorisation or allocation. The boundaries of the SB PWA can be found in a detailed map on DEW's WaterConnect site here: https://www.waterconnect.sa.gov.au/Pages/Advanced-Map-Search.aspx • It is noted that a well unit number 6028-02373 (borehole) drilled in 2002 is located on the project site and identified for stock use. • If the project requires underground water for consumptive use (including dust suppression, cooling, construction or any other purpose other than stock and domestic purposes, fire-fighting and public-access road making) then a water allocation is required pursuant to the Landscape South Australia Act 2019 (Landscape Act). Please contact the DEW Water Licensing Branch on (08) 372 7561 or at dew.mywater@sa.gov.au for advice regarding matters concerning underground water authorisation or allocations including any usage for worker facilities and potable use. • Any use of underground water for construction or concrete batching from groundwater sources needs to be assessed by DEW as to whether a well construction permit and authorisation to take water is required, this is also required to be included in the EIR. • The applicant has addressed details reflecting the location of the project site being within the SB PWA and groundwater requirements under the Landscape Act and that there is no expected use or impact on groundwater from this proposed development (EIR pg 29). • Any potential impacts to groundwater will need to be taken into account in the EIR and SEO. Surface Water / Watercourses • There are no watercourses located on the project site although there is a nearby waterbody (Little Swamp), impacts to which will need to be addressed in the EIR and SEO (see details in sections below). Flood • The applicant has identified the flood risk to be very low after considering the site topography, relative slope and onsite observations. Comments related to assessment and mitigation as detailed in sections below. Heritage – Non-Aboriginal • The applicants assessment is correct regarding no known heritage impacts on the proposed project site or within close proximity. Due to this, DEW considers there is a low risk of the project encountering archaeological features of potential significance although DEW recommends measures to protect any potential heritage values found during any stage of the project's 20 year life (see details in sections below). Native Vegetation Note: The Native Vegetation Council assess native vegetation clearance matters. This is not a matter for DEW.	Addressed across the EIR and SEO. Biodiversity/native fauna: EIR Section 8.10 and Section 10 (Native Fauna Management) include driver induction, fauna sighting reporting, fencing and injured-fauna measures, and DEW permit requirements; The SEO native-fauna objectives have been updated. Groundwater/SB PWA: EIR Section 8.6 confirms the site's partial location within the SB PWA, the on-site borehole (well unit 6028-02373) and that no underground water use is anticipated, with DEW acknowledged as the source. Surface water/watercourses: EIR Section 8.7 confirms no watercourses on site and addresses Little Swamp as the downstream receptor. Heritage: EIR Section 8.4 confirms low risk with unexpected-finds and stop-work measures.	EIR Section 8.6, Section 8.10, Section 10; SEO native-fauna objectives

Document: Comments Register - EIR & SEO
Project: Port Lincoln BESS
Application No.: AIL015
Applicant: Flow Power

Comment #	Topic/Section	Agency and Public Submissions comments	Proponent/Consultant Response	Document/Section
89.0	Flood	Flood • Whilst the flood risk has been identified as very low by the applicant, DEW advises that for any flood risk the applicant needs to check whether the current flood hazards overlay reflects the latest available flood studies and understanding of future flood risk under recently revised climate change projections. • Assessment of impacts under 1 % AEP only is unlikely to be sufficient in light of future climate change. In the case of a flood risk assessment being undertaken for the site (and access to and from the site) this assessment must use an up-to-date flood study that considers current and future flood risk in line with national guidance under Australian Rainfall and Runoff, including climate change scenarios. LC NOTE: Include in the SEO and will be undertaken prior to commencement of construction and submitted with the OMP.	Addressed. ELA's hydrology assessment (2025) is a qualitative desktop and field-validated study; it concluded the likelihood of significant flooding is very low but did not include detailed flood modelling or design-event (AEP) analysis. To address DEW's comment, a binding commitment has been added to the SEO (Objective 23 – SW3, Flooding) requiring that a detailed flood risk assessment be undertaken PRIOR to the commencement of construction, assessing at least the 1% and 2% AEP events using the most recent available data and considering current and future flood risk in accordance with Australian Rainfall and Runoff (2019) (including the August 2024 update to Book 1, Chapter 6) and climate change scenarios. The EIR (Sections 8.7 and 10) has been updated to align with this commitment.	EIR Section 8.7, Section 10; SEO Objective 23 (SW3)
90.0	Climate Change	Climate Change • The project needs to ensure that whole of life GHG emissions of the project are minimised as much as practicable irrespective of the project leading to renewable electricity generation and thus contributing to minimising greenhouse GHG emissions from the electricity sector. • GHG emissions needs to be minimised from construction, operation and decommissioning activities. This should include selection and use of materials and products with reduced embodied emissions including the use of alternative materials and technologies (e.g. green concrete, BESS with lower carbon footprint e.g. via battery chemistry, recycled content, improved manufacturing) and materials with high recycled content (steel, copper, road base etc). • The project needs to implement waste management approaches that consider minimising material quantities in the design and that maximise the recycling and re-use of demolition materials. Equipment selection should include consideration of recycling and reuse at end of life. • The project needs to undertake an assessment of climate change related risks for the duration of its life including impacts of severe weather (e.g. heatwaves and storm events) and identify measures to minimise these impacts. This should include managing the impacts of flooding, bushfires and extreme wind gusts on the ongoing operation of the installation. • Details described above need be addressed in the EIR and SEO in relation to mitigation measures and assessment criteria.	Addressed in the EIR and SEO. EIR Section 10 (Climate Change Mitigation – GHG and Severe Weather) commits to minimising whole-of-life GHG emissions (low-embodied-carbon materials, lower-carbon battery chemistry, recycled content, waste minimisation and end-of-life recycling) and to a climate change risk assessment addressing heatwaves, storms/flooding, bushfire and extreme wind across the Project's 20-year life. Corresponding objectives and assessment criteria are included in the SEO (Objective 21 – GHG1 and Objective 22 – CC1).	EIR Section 10; SEO Objective 21 (GHG1), 22 (CC1)
11			**Eyre Peninsula Landscape Board**	
91.0	General	1. The Eyre Peninsula Landscape Board (EPLB) has reviewed the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) submitted by Flow Power Pty Ltd in support of the Associated Infrastructure Licence application for the Port Lincoln Battery Energy Storage System, under the Hydrogen and Renewable Energy Act 2023. EPLB is a prescribed body under the Act and has considered the proposal in relation to matters within the Board's responsibilities. Based on the information provided, EPLB considers that: • the existing environment has been adequately described for the purposes of the application; • potential environmental impacts relevant to the Board's remit have been appropriately identified, and proposed mitigation measures are practical and likely to be effective; • the proposed environmental objectives and assessment criteria are acceptable; and • relevant legislation and guidance administered by this agency have been appropriately acknowledged. Accordingly, EPLB has no objection to the granting of an Associated Infrastructure Licence for the Port Lincoln BESS, subject to the implementation of the proposed environmental management and mitigation measures outlined in the EIR and SEO.	Flow Power welcomes both the review and comments from the Eyre Peninsula Landscape Board and is committed to implementing the environmental and amenity management measures put forward in the Project EIR and SEO.	General – EIR and SEO

Further information

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