SOUTH AUSTRALIA

Government of South Australia
Department for Energy and Mining

Consultation by the Minister

Northern Battery Energy Storage System (BESS)



energymining.sa.gov.au

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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 – Northern BESS EIR and SEO

In accordance with the Act and Regulations, the **Northern 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) and Transcontinental Port Augusta (19 February 2026).

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

- Attorney Generals Department – Aboriginal Affairs and Reconciliation (AAR)
- Department for Infrastructure and Transport (DIT)
- Department for Environment and Water (DEW)
- Department of Primary Industries and Regions (PIRSA)
- Department for Housing and Urban Development (DHUD)
- Native Vegetation Council (NVC)

- South Australian Country Fire Service (SACFS)
- South Australian Arid Lands Landscape Board (SAALLB)
- Civil Aviation Safety Authority (CASA)
- Air Services Australia
- Office of the Technical Regulator (OTR)
- Port Augusta Council

One public submission was received 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: [redacted] (AGD)

Sent: Monday, 30 March 2026 1:07 PM

To: [redacted] (DEM)

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

Subject: RE: HRE Act referral - Request for comment: Northern Battery BESS EIR & SEO

OFFICIAL

Good Afternoon [redacted],

Thank you for the opportunity to comment on an Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) written in relation to Davenport BESS Pty Ltd's Northern Battery, Battery Energy Storage System.

AAR acknowledges the Consultation Responses included as Table 2 in Attachment H, which demonstrates Davenport BESS Pty Ltd considered and addressed all feedback AAR provided on the draft EIR and SEO in November 2025. AAR confirms the amendments suggested to Davenport BESS Pty Ltd have been applied to the documents now circulated for comment.

With the amendments applied in response to AAR's previous comments AAR is satisfied the EIR and SEO now:

- adequately describe the existing heritage environment, as far as this is relevant to the proposed operations
- adequately identify the potential impacts on Aboriginal Heritage and the proposed mitigation measures are practical and are likely to achieve the desired objectives
- propose objectives with regards to Aboriginal heritage that are acceptable
- adequately met guidance and adequately refer to legislation administered by AAR

Sincerely,

[redacted] | Senior Project Officer (Heritage)
Aboriginal Affairs and Reconciliation | Attorney-General's Department

T: [redacted]
E: [redacted]

A: Level 16, Wakefield House, 30 Wakefield Street ADELAIDE SA 5000
PO Box 464, ADELAIDE SA 5000

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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.

airservices australia

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

From: Airspace Protection <Airspace.Protection@casa.gov.au>

Sent: Wednesday, 25 February 2026 11:52 AM

To: [redacted] (DEM)

Subject: F17/7289-1 - CASA Assessment Response - Port Lincoln Battery Energy - at 420 Northern Power Station Road, Port Patterson [SEC=OFFICIAL]

Follow Up Flag: Follow up

Flag Status: Flagged

You don't often get email from airspace.protection@casa.gov.au. Learn why this is important

OFFICIAL

Good afternoon [redacted]

Thank you for notifying the Civil Aviation Safety Authority (CASA) of the proposed construction and operation of the Northern Battery – Battery Energy Storage System (BESS), to be located at 420 Northern Power Station Road, Port Patterson.

CASA has reviewed the information provided and is not aware of any civil certified aerodrome for which an Obstacle Limitation Surface (OLS) would require protection, given that the nearest certified aerodrome is Port Augusta Airport which is over 7.9km away. Therefore, this development falls outside CASA's formal regulatory framework for aerodromes.

CASA is also unaware of any unregulated aerodrome which may not published in the Aeronautical Information Publications being within 2.5km of the proposed communications lattice tower site. Enquiries regarding whether there are any unregulated aerodromes in close proximity to the proposed site should be directed to the local council/shire.

Given the proposed BESS will be less than 10m above ground level (AGL) and provided that there is no impact identified on any unregulated aerodromes, CASA is not recommending any lighting or marking requirements for this proposed BESS.

Additionally, CASA agrees with the "*Environmental Impact Report (EIR) Northern Battery*", prepared by Davenport BESS Pty Ltd., that "*Construction and operational activities of the BESS are unlikely to be of a height or form that would impact upon aircraft utilising either of these airfields. However, the development would need to satisfy any relevant aviation legislative requirements".* Should any construction equipment or temporary works have the potential to impact operations at Port Augusta Airport, a separate application to CASA would be required.

I hope this information is of assistance to you.

Kind regards

[redacted]
Aerodrome Specialist – Developments

Air Navigation, Airspace & Aerodromes Branch
CASA \ Air Navigation, Transformation and Risk Division

p: 03 9518 2781
GPO Box 2005 CANBERRA ACT 2601
www.casa.gov.au

Government of South Australia
Department for Environment and Water

DEW-D0033555

Office of the Chief Executive
81-95 Waymouth Street
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GPO Box 1047
Adelaide SA 5001
Australia
Ph: +61 8 8204 1910
www.environment.sa.gov.au

[redacted]
Development Manager
AMPYR Australia Pty Ltd
Level 17, 167 Macquarie Street,
SYDNEY NSW 2000

By email: [redacted]

Dear Mr [redacted]

Project:	Northern Battery Project
Application:	Associated Infrastructure Licence (AIL) under the HRE Act
Applicant:	AMPYR Australia Pty Ltd
Location:	420 Northern Power Station Road, Port Paterson South Australia CT 5478/39 Parcel ID H120800 S349 6km to the Southeast of Robertstown in the mid-north region.

Thank you for your email dated 14 November 2025 inviting the Department for Environment and Water (DEW) to comment on the pre-lodgement application from AMPYR Australia Pty Ltd for an Associated Infrastructure Licence (AIL) under the *Hydrogen and Renewable Energy Act 2023* (HRE Act) for the Northern Battery Energy Storage System (BESS) project.

DEW acknowledges the significant time and effort invested in preparing the detailed reports and supporting information for this proposed development.

DEW has reviewed the draft Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) and associated documentation supporting the proposed AIL to construct, operate and decommission the Northern BESS, and provides the following comments related to matters within DEW's legislative responsibility pursuant to section 73 and regulation 40 of the HRE Act and associated regulations:

<u>Biodiversity Values</u>

DEW recommends the EIR include reference to, and assessment of the potential impacts on native fauna species listed under the *National Parks and Wildlife Act 1972* (NPW Act). Presently, Section 4.3.2 of the EIR focuses on assessment and potential impact to those species listed under the *Environment Protection and Biodiversity Conservation Act 1999*. DEW's data shows that up to 12 native fauna species listed under the NPW Act (nine rare and three vulnerable species) occur within a 5-kilometre radius of the project footprint, noting that only part of the records are publicly available. DEW can provide access to all data available upon request.

DEW further recommends that management of native fauna is more adequately addressed in the EIR and SEO to include, firstly, the requirement under the NPW Act to apply for a permit to catch, move, relocate or destroy native fauna (being protected animals and eggs under the NPW Act), and secondly,

the inclusion of appropriate management of native fauna in all management plans (during construction, operation and decommissioning) and any investigations. The SEO, Table 1, Objective 6, "No clearance of native vegetation or disturbance to native fauna unless approval under the relevant legislation is obtained" (pg 10) does not currently include the need to apply for a permit for native fauna management nor are all stages of the project included for the project site.

During each stage of the project and for any investigations or assessments on the project site, if the applicant needs to catch, move, relocate or destroy any protected animal or eggs, the applicant is required to apply for a permit under the NPW Act. Further information on permits to capture, release or destroy wildlife can be found at DEW's website:
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, flooding and stormwater

DEW supports that stormwater will be managed on-site; this will ensure that runoff entering the marine environment is avoided. DEW also supports that flood risk will be addressed at the detailed design phase. Any flood modelling undertaken to support the detailed design should assess a 1:100 year Average Recurrence Interval flood event and apply South Australian Government climate change projections appropriate to the assumed design life of the development.

To adopt a conservative approach, DEW recommends the applicant use:

- Data SA flood data, and
- high emissions scenario climate projections from the South Australian Climate Projections Viewer (DEW),
- using a time horizon that best aligns with the nominated design and operational life of the development (for example, 2040–2059).

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].

Yours sincerely

[redacted]

[redacted]
CHIEF EXECUTIVE

03/02/2026

Cc: [redacted], Principal Environmental Regulator, Department for Energy and Mining,
Email: DEM.EnergyRegulation@sa.gov.au

From: [redacted] (DHUD)

Sent: Wednesday, 4 March 2026 9:49 AM

To: [redacted] (DEM); DEM:Energy Regulation

Subject: FW: HRE Act referral - Request for comment: Northern Battery BESS EIR & SEO

Follow Up Flag: Follow up

Flag Status: Flagged

OFFICIAL

Hi [redacted]

I refer to the proposed Northern Battery, Battery Energy Storage System (BESS) by Davenport BESS Pty Ltd (a subsidiary of Green Gold Energy Pty Ltd), located at 420 Northern Power Station Road, Port Patterson, approximately 5 km south-east of Port Augusta.

Thank you for your email dated 23 January 2026 requesting comment under Sections 73(2)&(4) of the *Hydrogen and Renewable Energy Act 2023* (the Act) in relation to Davenport BESS Pty Ltd's application for an Associated Infrastructure Licence (AIL).

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

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 Strategic Employment Zone of the Planning and Design Code (the P&D Code). The zone envisages a range of industrial, logistic, storage, research and training land uses that generate wealth and employment (DO1). A renewable energy facility (other than a wind farm) is envisaged in the zone (PO1.1). The subject site abuts the Rural Living Zone to the east, which envisages residential development. DTS/DPF 1.2 (of the SE Zone) provides a list of 'appropriate' land uses for land abutting a residential zone, and a renewable energy facility is not listed. Notwithstanding, the proposed development footprint of the BESS is set back over 300m from the eastern site boundary, which will assist in mitigating interface impacts. The locality is characterised by electricity infrastructure (substations, transmission lines and towers) with numerous renewable energy facilities proposed and/or approved. To the north of the proposed BESS site on Northern Power Station Road, within the Rural Living Zone, are two approved solar farms, one constructed and the other in the early

	stages of site mobilisation. In this respect the proposal is generally consistent with the existing pattern of development in the locality. <u>Recommendations</u> ▪ If a licence is granted, conditions(s) relating to decommissioning should be included, to facilitate the removal of infrastructure and return of impacted land to its existing condition (if desired by the land owner).
Planning & Design Code	The 'Infrastructure and Renewable Energy Facilities' module of the P&D Code provides guidance for BESS developments. Development should minimise hazards, be environmentally and culturally sensitive, and manage adverse impacts on natural landscapes are residential amenity. The EIR includes an assessment against relevant provisions of the P&D Code. Key points are summarised below. <u>Setbacks and Interface Impacts</u> The subject site is adjacent to the Rural Living Zone. The nearest sensitive receiver (within the Rural Living Zone) is over 500m south-east of the proposed BESS footprint. Potential impacts to sensitive receivers within the adjacent Rural Living Zone include noise, light, visual intrusion and construction impacts. These impacts are given detailed consideration in the EIR and reflected in the SOE with appropriate assessment criteria and leading performance criteria, including: ▪ The site is located within a low lying, previously excavated area which will reduce visual impact. ▪ Landscaping is proposed around the perimeter of the facility. The landscaping approach should have regard to local conditions, in order to maximise success of vegetation growth. ▪ Noise emissions to meet Noise EPP criteria during both construction and operation. ▪ CEMP and OMP to incorporate dust management controls. <u>Infrastructure</u> The BESS is located near Davenport substation, with the connecting transmission line to be undergrounded, which will minimise the extent of transmission lines required for grid connection. The EIR states that road infrastructure upgrades will not be required, noting that access to the development site is via Northern Power Station Road (sealed, no kerbs). Temporary traffic control measures will be required during construction. <u>Environment and Heritage</u> The BESS footprint is within a disturbed area, previously used as a borrow pit. The BESS proposal requires the removal of 6.7ha of native vegetation, the majority of which has naturally regenerated on the site. There is an Aboriginal artefact scatter site within the subject land, but not within the BESS development site. The Applicant is working with Traditional Owners to undertake

	a full cultural heritage assessment and develop a Cultural Heritage Management Plan. Discovery protocols will be incorporated into the CEMP and OMP. <u>Hazards</u> The subject site is within the Bushfire – Regional Overlay. Vehicular access to the site is from Northern Power Station Road, via a private site access driveway. The final layout of the development should facilitate access within the site and incorporate firefighting water (and equipment) as required by the CFS. The project footprint is within an area of known groundwater contamination, associated with the former Port Augusta Power Sation to the west. The PSI prepared for the EIR concludes that it is considered highly unlikely that contamination would pose a risk to human health or the environment at the development site. Notwithstanding, the CEMP should include appropriate protocols for spoil and groundwater management during ground disturbing activities. <u>Recommendations</u> ▪ External lighting to be low intensity (for security purposes) and designed to limit spill in accordance with relevant Australian Standards. ▪ A post construction noise survey should be undertaken to confirm that actual noise levels meet the Noise EPP criteria. ▪ That CFS be consulted on the final site layout and operational management plan(s) to review the adequacy of mitigation measures.
Regional Plans	The current policy framework relevant for the subject site is the Far North Regional Plan (January 2026). The Far North is identified as a hub for renewable energy generation, as a key contributor to the region's economic profile. The long-term objections of the Plan are to support and facilitate renewable energy generation and storage, to contribute to a decarbonised economy and mitigate impacts of climate change. <u>Recommendations</u> NA
State Planning Policies	The proposal directly relates to State Planning Policy 12 (Energy) which seeks the facilitation of renewable energy facilities where the impact on surrounding land uses, regional communities and the natural and built environment can be minimised. Various other SPPs are relevant including SPP 4 which seeks to maintain and enhance South Australia's biodiversity and life supporting functions. The impact of the development on native vegetation and biodiversity will be considered under the *Native Vegetation Act 1991* and *EPBC Act 1999.* <u>Recommendations</u> NA
Previous decisions	Development applications by Green Gold Energy for renewable energy facilities within the locality:

	▪ 660/117/2020: Application by Green Gold Energy for a 4.95MW solar farm at 2B Marks Road, Port Paterson – REFUSED by Upper Spencer Gulf Regional Assessment Panel on 21/02/2024. ERD Court appeal with a compromise accepted on 12 June 2024, however details of the compromise are unknown (*Green Gold Energy Pty Ltd v The Corporation of the City of Port Augusta [2024] SAERC 17 (25 June 2024)*). Unknown if Green Gold is proceeding with this development. ▪ Crown sponsorship application by Green Gold Energy for a 272MW BESS at 2B Marks Road – not supported by DHUD, and Crown Sponsorship not granted by DEM. ▪ Unknown DA number: Application by Green Gold Energy for a 4.4MW solar farm at Lot 7 Northern Power Station Road, Port Augusta – APPROVED by City of Port Augusta on date unknown – construction complete.
Other matters	NA

Should you have any further queries please do not hesitate to contact me.

Kind regards

[redacted]
Project Lead, Crown and Impact Assessment
Planning and Building

Department for Housing and Urban Development

T [redacted]
W dhud.sa.gov.au

Level 10, 83 Pirie St, Adelaide SA 5000



The Department for Housing and Urban Development acknowledges First Nation people as the Traditional Owners of South Australian land and waters and we extend our respect to Elders past, present and emerging. We value and recognise the ongoing cultural heritage, beliefs and relationship First Nations peoples have with these lands and waters and the continuing importance of this today.

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In reply please quote #2026/00118, 24317045
Enquiries to [redacted] dit.landusecoordination@sa.gov.au

Government of South Australia
Department for Infrastructure and Transport

TRANSPORT STRATEGY AND PLANNING DIVISION

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Adelaide SA 5001
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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	Northern Battery, Battery Energy Storage System
Applicant	Davenport BESS Pty Ltd
Location	420 Northern Power Station Road, Port Patterson
Proposal	A Renewable Energy Infrastructure License (REIL) to deliver an operational power output of 270MW/ 1043.1 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 5 kms south-east of Port Augusta with road frontages to Port Paterson Road and Northern Power Station Road which are under the control of the Port Augusta City Council. Both these roads intersect with the Augusta Highway, which is an arterial road under the care, control and management of the CoH.

Augusta Highway is identified as a Major Traffic Route, 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'. Augusta Highway carries approximately 10,100 vehicles per day (21% commercial vehicles) and has a speed limit of 80km/h at the Northern Power Station Road intersection, transitioning to 110 km/h prior to the Port Paterson Road intersection.

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 270 MW.

The Department has reviewed the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO), including the Traffic Impact Assessment (TIA) prepared by CIRQA (Version V1.0, dated 07 October 2025). CIRQA's TIA outlines that the majority of the traffic associate with the site will be generated during the construction-phase and that there will be minimal ongoing operational vehicle movements. Access to the site will be via Northern Power Station Road, which connects directly to Augusta Highway.

The TIA assessed the performance of the Augusta Highway/Northern Power Station Road intersection and confirmed that the intersection will adequately cater for all traffic generated by the proposed development. The intersection is already provided with channelised left- and right-turn treatments, including acceleration and deceleration lanes, which support safe and efficient vehicle movements.

The assessment concluded that the intersection has sufficient capacity, operates safely, and complies with relevant design standards. All turn-path analyses and sight-distance assessments included in the TIA demonstrate compliance with Austroads requirements. DIT has reviewed the findings of the TIA and agrees with CIRQA's conclusions. It is noted that the Construction Environmental Management Plan will also include a Traffic Management component, which is supported. This will need to be provided to the Department for Infrastructure and Transport for review prior to the commencement of construction.

Further to the above, it is noted that an upgrade of Augusta Highway/Northern Power Station Road intersection is already underway, with completion expected in mid-2026. This upgrade is being delivered under the Freight Highway Upgrade Program. At present, the Augusta Highway/Northern Power Station Road intersection is gazetted for use by PBS Level 3 vehicles; however, the project will upgrade the intersection to accommodate higher-productivity vehicles up to PBS Level 4 (equivalent to 53.5-metre triple road trains). This will further enhance the intersection's capacity and safety performance beyond what is required for the proposed development.

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 that impact on the arterial road network. 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 arterial road modifications/upgrades 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 [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 all proposed intersection and junction upgrades on the DIT 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

Native Vegetation Council

81-95 Waymouth Street
Adelaide SA 5000

GPO Box 1047
Adelaide SA 5001

Ph| 08 8303 9777

nvc@sa.gov.au

Our ref
Your Ref

Contact: [redacted] Policy Officer
Telephone: [redacted]

13 April 2026

[redacted]
Department for Energy and Mining
GPO Box 618
Adelaide, SA 5000
Email: DEM.EnergyRegulation@sa.gov.au

Dear [redacted],

Thank you for the opportunity to comment on Green Gold Energy Pty Ltd's (GGE) application under the *Hydrogen and Renewable Energy Act 2023* for an Associated Infrastructure Licence (AIL) to develop the Northen Battery Project. The Council appreciates the inclusion of the Data Report and the proponent's efforts to address previous comments.

The Native Vegetation Council (Council) is an independent statutory body established under the *Native Vegetation Act 1991* (NV Act). Its functions include keeping the condition of native vegetation in the State under review and advising in relation to the preservation, enhancement and management of existing native vegetation for the wellbeing of all South Australians. Further functions involve encouraging the re-establishment of native vegetation and research, considering applications to clear native vegetation, determining offsets, and enforcing compliance with the NV Act. The Council's work occurs on the lands and waters of the First Nations peoples of this country.

In addition to this submission, it is noted that the Council has issued its preliminary advice regarding the formal clearance application pursuant to the NV Act. Previous advice raised no objection to the development, subject to the satisfaction of the Significant Environmental Benefit (SEB) obligations and AIL approval.

I note that:

- Davenport BESS Pty Ltd, a subsidiary of GGE, is proposing to contribute to South Australia's renewable energy targets by developing a 270 MW Battery Energy Storage System (BESS) and an associated transmission corridor. The proposed project requires 208 battery containers and 52 inverters.

- The project site is located at 420 Northern Power Station Road, Port Paterson, which is situated approximately 300 km north of Adelaide, South Australia. The proposed project footprint comprises an area of approximately 995 ha. The site is situated amongst multiple regional renewable energy project sites.

- The project footprint has a long history of disturbance associated with energy generation. Scattered native vegetation remains on the site and was subject to two historical native vegetation clearance applications.

- The project is designed to avoid a small area of native vegetation contained within the north-west corner of the project site. Other areas of the subject land are located within a South Australian Property and Planning Atlas (SAPPA) Conservation Zone, though these are excluded from the project footprint.

- The proponent has lodged an application to clear native vegetation under Regulation 12, Schedule 1, Clause 34 on 22 October 2025 as a Level 3 application.

- The EIR identifies the following potential sources of direct and indirect impacts on the site's native vegetation:
    - The direct impacts of native vegetation clearance, introduction, spread or regeneration of declared pest plants and animal species, fire sparked from overheating or electrical faults during installation and equipment testing, spread of bushfire, and fire caused by malfunction of BESS.
    - The indirect impacts of dust generation, vehicle impacts, soil contamination, and reduced hydrology.

- Further detail regarding environmental management strategies and assessment will be contained within future drafts of the Construction Environmental Management Plan (CEMP) and Operations Management Plan (OMP). These documents will also discuss the proponent's proposed mitigation of noise, dust, vehicle and weed impacts.

I provide the following comments:

- The proponent has adequately referred to and updated documentation to reflect previous Council advice, incorporating the recommended sources of indirect impacts on native vegetation and providing additional information regarding offset options and regeneration. After having sought advice regarding on-ground offsets, the proponent now proposes to address the significant environmental benefit via payment into the Native Vegetation Fund.

- There is potential for the EIR to recognise the potential impact that native vegetation clearance may have on the following receptors:
    - air quality
    - biodiversity
    - soil composition
    - surface water.

- When discussing Upper Spencer Gulf Marine Park (see section 4.3), the EIR notes that, 'Native vegetation refers to any naturally occurring local plant species which are indigenous to Australia, from small ground covers and native grasses to large trees and water plants.' The Council notes that, under the NV Act, native vegetation is defined as a plant or plants of a species that is indigenous specifically to South Australia. This

includes a plant or plants growing in or under waters of the sea. However, it does not include a plant or part of a plant that is dead, or a plant intentionally sown or planted (unless otherwise declared by the Act itself or its regulations). The Council encourages greater specificity when defining native vegetation.

- The SEB requirement of 131.11 SEB points to be achieved by payment into the Native Vegetation Fund of $14,635.22 ($13,872.25 (GST exclusive) and $762.97 administration fee (GST inclusive)) has been calculated properly.

Thank you again for the opportunity to provide comments. If you have any questions about this submission, please contact [redacted], Policy Officer, on telephone number [redacted] or email [redacted].

Yours sincerely

[redacted]

[redacted]

A/ Team Leader, Assessments and Compliance

NATIVE VEGETATION BRANCH

DELEGATE TO NATIVE VEGETATION COUNCIL

From: DEM:OTR Electricity Infrastructure

Sent: Tuesday, 17 February 2026 11:32 AM

To: [redacted] (DEM)

Subject: RE: HRE Act referral - Request for comment: Northern Battery BESS EIR & SEO

Follow Up Flag: Follow up

Flag Status: Flagged

OFFICIAL

Hi[redacted],

The Northern BESS project appears consistent with the OTR certificate issued.

Regards

[redacted]
Jurisdictional System Security Engineer

Department for Energy and Mining
T [redacted] | M [redacted] | E [redacted]

DISCLAIMER:
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Davenport BESS Pty Ltd - Northern Battery, Battery Energy Storage System

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

General Comments
The proponents have acknowledged the accommodation constraints within Port Augusta and the wider region, particularly given the number of major projects currently proposed. They have committed to working collaboratively with Council to identify the most appropriate accommodation solutions. One option identified is the establishment of temporary workers' accommodation on land within the local area, subject to relevant planning and regulatory approvals. It is encouraging that the proponents of the Northern Battery project recognise that the concurrent/proposed development of other infrastructure projects in the region presents opportunities to collaborate with other developers in the provision of shared temporary workers' accommodation. This cooperative approach could deliver broader and more lasting benefits for the regional economy and community, i.e. new business opportunities. Such collaboration addresses several critical challenges, including housing and accommodation pressures, workforce availability, and service delivery impacts. By working together, project proponents can more effectively meet workforce needs, reduce cumulative impacts on the community, build local confidence, and support, and leave a more positive legacy for the region.
Environmental Impact Report
• Pg 29 – 4.2.1 Surface Water – "Whilst the SAPPA and NatureMaps show water within the boundaries of the subject land, none will be impacted by the Northern Battery facility." Water may not be impacted by the facility, however the facility maybe impacted by water under certain scenarios; what is the risk of, not just surface but also marine waters impacting the site? • Pg 70 – 4.8.6 – Community Benefit Program - Initially Community Benefit is $40,000pa to support a variety of local projects, will a percentage be allocated to First Nations initiatives or is there separate funding for First Nations? What is the proposed long-term benefit sharing? (see below Objective 9) • Pg91 – 5.2.6.4 – Fire management requires identification of water storage, however identification of water sources and quality for the site is required, i.e. will the water be sourced from SA Water or use other sources of water, i.e. recycled water or stormwater diversion?

Statement of Environmental Objectives
• Pg13- Objective 10 – compliance with Landscape SA Act if dealing with the management of surface water, including Stormwater. • Pg12 – Objective 9 - Establish and operate a community benefit fund for the life of the project with a minimum annual contribution to the scheme of $150/MWh indexed for CPI annually; how is this determined?

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Port Augusta
CITY COUNCIL

AR26/23385

Date 15th April 2026

To whom it may concern

RE: NORTHERN BESS ENVIRONMENTAL IMPACT REPORT AND STATEMENT OF ENVIRONMENTAL OBJECTIVES – COMMENTS

Council is in receipt of the EIR report and Statement of Environmental Objectives (SEO) for the Northern BESS prepared Pursuant to section 72 of the *Hydrogen and Renewable Energy Act 2023* (HRE Act).

The proposed Battery Energy Storage facility is situated on land owned by Port Augusta Operations at 420 Northern Power Station Road. We have reviewed the documentation and herewith submit our comments in relation to the salient issues for the City of Port Augusta.

Land Description Discrepancy

A discrepancy has been identified in the legal description of the subject land. The EIR (page 12, "Exclusions and Constraints") references Certificate of Title Volume 6226 Folio 253, whereas Council records identify the land as CT Volume 6325 Folio 957.

Accuracy in land identification is critical in statutory consultation processes. This inconsistency presents a potential legal risk and may expose the process to challenge. It is recommended that this error be rectified promptly, and consideration be given to recommencing consultation with the correct details if required.

Scope of Receiving Environment

Council considers that the description of the receiving environment is overly narrow, being limited primarily to immediate physical attributes. A comprehensive assessment should also include socioeconomic characteristics of Port Augusta, including relevant statistical indicators and community needs.

In particular, an economic impact assessment should address:

- Potential inequities arising from reduced rate revenue compared to alternative developments; and
- Mechanisms to offset such impacts, including developer contributions or other funding arrangements to support Council service provision.

Scope Limitations and Associated Infrastructure

The EIR and SEO exclude areas of the subject land outside the immediate development footprint. This limitation is not considered reasonable, particularly where associated infrastructure—such as access roads—will be constructed within the broader landholding as a direct consequence of the development.

Key details are currently unclear, including:

- The location and design of the access road;
- Construction standards, including provision for all-weather access; and
- Flood resilience of access infrastructure.

These elements should be clearly defined and included within the assessment.

Land Tenure and Infrastructure Governance

Given that the subject land surrounds the development site and will accommodate shared infrastructure, Council considers that appropriate land tenure and governance arrangements are essential.

Leasehold arrangements alone may be insufficient to manage long-term obligations. Alternative mechanisms should be considered, including:

- Community Title arrangements to manage shared infrastructure and multiple land interests; or
- A formal Land Management Agreement.

Such mechanisms must ensure:

- Clear allocation of responsibilities for infrastructure delivery and maintenance; and
- Transferability of obligations to future landowners.

Council recommends that legal arrangements be formalised and included within the EIR, with input from Crown Law as part of the assessment process.

Traffic and Access

With concurrent development occurring within the subject land (including the Hallett Group project), it is critical to ensure safe and efficient traffic movements.

The EIR should:

- Clearly identify the internal access road on site plans (consistent with the depiction of the Davenport Substation connection);
- Illustrate the relationship between the proposed access road and the Hallett site entrance; and
- Define responsibilities for construction and ongoing maintenance of all internal road infrastructure from Northern Power Station Road to the development site.

Access infrastructure must be designed to maintain functionality during a 1% AEP flood event, including seal level rise impacts during the operational life of the project, and be secured through legally binding agreements that extend beyond current ownership arrangements.

Flood Risk and Mitigation

Flooding has not been adequately addressed in the current EIR.

Council's site analysis indicates that the development site may be subject to inundation of up to 1.5 m AHD above existing ground levels, without additional consideration being given to the impacts of sea level rise over the operational duration of the project.

Given the essential infrastructure nature of the proposal, a higher standard of flood resilience is warranted.

It is recommended that:

- A revised flood and stormwater assessment be prepared;
- Appropriate mitigation measures be incorporated to maintain pre-development runoff conditions; and
- Advice be sought from the Stormwater Management Authority and the State Emergency Service (SES).

Noise Impacts

While the acoustic assessment concludes compliance with the Environment Protection (Commercial and Industrial Noise) Policy 2023, Council notes that proposed flood mitigation measures (e.g. raising the site or "perching" BESS units) may alter noise propagation.

Given the proximity of the Rural Living Zone to the east, including existing and future dwellings, it is recommended that:

- The acoustic assessment be reviewed following finalisation of flood mitigation design; and
- Any changes in elevation be explicitly considered in noise modelling.

Conclusions and Recommendations

Council acknowledges that the proposal represents essential infrastructure of regional, state, and national significance. However, the following matters require resolution:

- Establishment of legally enforceable and transferable arrangements for land access and shared infrastructure, through:
    - A Land Management Agreement; or
    - Community Title arrangements; or
    - Alternative mechanisms ensuring long-term certainty;
- Preparation of a revised flood and stormwater report addressing identified risks and incorporating appropriate mitigation measures;

- Inclusion of a socioeconomic assessment addressing community impacts and mechanisms for financial contributions to offset reduced rating capacity; and

- Review of the acoustic assessment following finalisation of flood mitigation design.

Please do not hesitate to contact me on [redacted] or via email [redacted] should you have any questions.

Yours faithfully

[redacted]

[redacted]
Acting Manager Growth and Regulatory Services

HRE – Northern Battery BESS EIR & SEO AGENCY COMMENTS

Government of South Australia

Document control
KC:
ES:
BD:
DM: 1.5
CE: 1
MW:
AS:
JS: 0.5

Raised by:
SAALLB – South Australian Arid Lands Landscape Board **due 30th March 2026**

Section	Issue	Comments	Raised by:	Response
5.2.4.4	Removal of pest plants from site prior to construction	The movement of declared pest plants material or potential containment requires appropriate permitting by either SAALLB or PIRSA (Weed species dependent), under Section 186 of the Landscape SA Act 2019	Biosecurity	
EIR, 5.2.5.4, pg 89	Extra control measure to consider for reducing fauna vehicle collisions	Consider adding a control measure around minimising driving at times of higher animal activity and reduced visibility (such as dawn and dusk).	Ecology	
EIR 4.2 Pg 89	Water Resources	The land is within the SAALLB Non-prescribed area.	Water	

Date:	27/03/2026
Our reference:	20260327-01jp
Your reference:	NA

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

Application	Associated Infrastructure License (AIL) (Energy Infrastructure Facility)
Nature of Development	The project incorporates a BESS with a nameplate capacity of up to 270 MW, comprising approximately 208 batteries with nominal 1043.1 MWh storage capacity. Other infrastructure to include: • Inverters • Substation • Site amenities.
Development Number	N/A
Development/Property Name	Northern BESS Project
Location	420 Northern Power Station Road, Port Paterson
Owner	Davenport BESS Pty Ltd ATF Davenport BESS 2 Trust (the Project Company)
Applicant	MasterPlan SA Pty Ltd

LEGISLATIVE FRAMEWORK

Instrument	*Hydrogen and Renewable Energy Act 2023 (HRE Act) and Hydrogen and Renewable Energy Regulations 2024 (HRE Regulations)*
Overlay	Hazards (Bushfire – Regional) Overlay
Fire Authority/ Response Area	South Australian Country Fire Service/Stirling North 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 (EIR) Northern Battery dated January 2026
- Statement of Environmental Objectives (SEO) Northern Battery dated January 2026
- Attachment A Plans and Technical Specifications

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 – Regional) Overlay

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

DO 1 Development, including land division responds to the relevant level of bushfire risk and is sited and designed to mitigate 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 Stirling North 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 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 no less than 19 metres from the property boundaries/site boundary perimeter fence or existing vegetation being retained, for the purposes of maintaining an APZ and to achieve maximum exposure of no more than BAL 12.5 kW/m^2.

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 within 19 metres 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 notes the reference to onsite worker accommodation and requests that all accommodation buildings are appropriately compliant for this intended use.

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**	[redacted]	27/03/2026

Application ID	23032967
Created	24/02/2026 9:28 AM
Modified	24/02/2026 9:52 AM

Name	Vicki Hewett
Email	[redacted]
Which sections of the EIR and/or SEO does your feedback relate to?	Both EIR and SEO

Comments	The consultation process for this project with local residents has been respectful and constructive. As a resident living near the proposed site, I feel that our concerns regarding health and wellbeing, environmental impacts, and other potential effects of the project have been genuinely heard and appropriately addressed within the planning process. In particular, I note that project-related traffic will not use Port Paterson Road, which has been identified in other proposals for the area as a "low traffic" and is a very dusty road which runs along two sides of our property. Instead, traffic will be directed to the sealed Old Power Station Road, which is better suited to accommodate increased vehicle movements during the construction phase. I also acknowledge that the dust management plan includes provisions to halt work on days when dust generation may adversely impact nearby residents. Importantly, the selected project site does not involve clearing previously undisturbed native vegetation and is therefore unlikely to significantly affect the native flora and fauna located along Port Paterson Road. Additionally, the project is situated at a sufficient distance from residential properties to ensure that noise impacts will be minimal. As our area is classified as "Rural Living," I do not believe this project will have any substantial negative impact on our lifestyle or wellbeing. On the contrary, it may provide further opportunities for our local community. Thank you for the opportunity to provide feedback.

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

Attachment I

Summary of Submissions During Statutory Consultation

Table 26 Summary of Submissions During Statutory Consultation

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
1	**Department for Environment and Water (DEW)**		
1.1	DEW recommends that the EIR includes reference to, and assessment of the potential impacts on native fauna species listed under the *National Parks and Wildlife Act 1972* (NPW Act). Currently the EIR Section 4.3.2 focuses on the EPBC species. DEW data notes up to 12 native fauna species (NPW Act 9 rare and 3 vulnerable) within 5km of project site.	The Native Vegetation Clearance Data Report prepared by Environments by Design which accompanied the EIR contained an analysis of native fauna species.	EIR Section 4.3.2 – additional wording included in the discussion regarding native fauna.
1.2	DEW recommends management of native fauna is more adequately addressed in the EIR and SEO. NPW Act requires a permit to catch, move, relocate or destroy native fauna. All management plans should include appropriate management of native fauna.	Noted and EIR and SEO amended to reference requirement for permits to be included in CEMP and OMP.	EIR Ecology *Impact ID #E1 altered to reference permit requirements under the NPW Act.* EIR Ecology Impact ID #E1 and SEO Objective 6 amended Leading performance criteria amended to include: • CEMP and OMP note requirement pursuant to the NPW Act that permits are required to catch, move, relocate or destroy native fauna.
1.3	SEO Table 1 – Objective 6 does not currently include the need to apply for a permit for native fauna management, nor are all stages of the project included for the project site.	As above.	As above.
1.4	DEW supports stormwater being managed on site to avoid runoff entering the marine environment. Any flood modelling undertaken to support the detailed design should assess a 1:100 ARI flood event and apply SA Government climate change projections.	Flood modelling has not been undertaken. The final site layout would take account of flood mitigation. The requirement to apply SA Government climate change projections is noted.	No alterations to EIR/SEO required.
2	**Department for Infrastructure and Transport, Transport Strategy and Planning Division (DIT)**		
2.1	DIT notes that the Traffic Impact Assessment (TIA) undertaken by CIRQA, concluded that the intersection of Augusta Highway and Northern Power Station Road has sufficient capacity, operates safely, and complies with relevant design standards. All turn-path analyses and sight-distance assessments included in the TIA demonstrate compliance with Austroads requirements. DIT has reviewed the findings of the TIA and agrees with CIRQA's conclusions.	Noted	No alterations to EIR/SEO required.
2.2	DIT notes and supports that the Construction Environmental Management Plan (CEMP) will include a Traffic Management component. DIT seek to review a Traffic Management Plan prior to the commencement of construction.	Preparation of traffic management control measures in CEMP/OMP contained within EIR – Traffic Impact ID#T1 and leading performance criteria and SEO Objective 9.	No alterations to EIR/SEO required.
2.3	DIT advised that an upgrade of Augusta Highway/Northern Power Station Road intersection is underway, with completion expected in mid-2026. This upgrade is being delivered under the Freight Highway Upgrade Program. At present, the Augusta Highway/Northern Power Station Road intersection is gazetted for use by PBS Level 3 vehicles; however, the project will upgrade the intersection to accommodate higher-productivity vehicles up to PBS Level 4 (equivalent to 53.5-metre triple road trains). This will further enhance the intersection's capacity and safety performance beyond what is required for the proposed development.	Noted.	No alterations to EIR/SEO required.
2.4	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 proponent acknowledges the requirement for a traffic management plan and will defer to DEM regarding the methodology for inclusion of DIT recommendations for conditions.	Amendment of Leading Performance Indicator updated in the EIR (Impact ID#T1) - Leading Performance Indicator. Amendment of and SEO (Obj. 9) - Leading Performance Indicator.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
2	**Department for Infrastructure and Transport, Transport Strategy and Planning Division (DIT)**		
	(c) Managing impacts to infrastructure within the road reserve. 2. All costs associated with the design and construction of any arterial road modifications/upgrades 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. 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.	The proponent acknowledges the requirement for a traffic management plan and will defer to DEM regarding the methodology for inclusion of DIT recommendations for conditions.	No alterations to EIR/SEO required.
3	**South Australian Arid Lands Landscape Board (SAALLB)**		
3.1	EIR Section 5.2.4.4 - Removal of pest plants from site prior to construction - The movement of declared pest plants material or potential containment requires appropriate permitting by either SAALLB or PIRSA (Weed species dependent), under Section 186 of the *Landscape SA Act 2019*.	Noted and an additional control measure included in EIR Declared Pests, Plants and Animals – Impact ID#DP1 and SEO Objective 5.	Additional wording in control measure - EIR Declared Pests, Plants and Animals – Impact ID#DP1. SEO Objective 5 – additional leading performance criteria: • Obtain permits, as required pursuant to *Landscape SA Act 2019* for removal and movement of declared pest plants material or potential contamination.
3.2	EIR Section 5.2.5.4 - Consider adding a control measure around minimising driving at times of higher animal activity and reduced visibility (such as dawn and dusk).	Noted and additional control measure included in EIR Ecology Impact ID #E2.	Additional wording in control measure - EIR Ecology Impact ID #E2.
3.3	EIR 4.2 – Water resources - The land is within the SAALLB Non-prescribed area.	Section 4.2 references the Northern and Yorke Non-prescribed area in error and this should be the SAALLB Non-prescribed area.	Correction to EIR Section 4.2 text.
4	**Aboriginal Affairs and Reconciliation (AAR) – Attorney-General's Department (AGD)**		
4.1	With the amendments applied in response to AAR's previous comments AAR is satisfied the EIR and SEO now: • adequately describe the existing heritage environment, as far as this is relevant to the proposed operations. • adequately identify the potential impacts on Aboriginal Heritage and the proposed mitigation measures are practical and are likely to achieve the desired objectives. • propose objectives with regards to Aboriginal heritage that are acceptable. • adequately met guidance and adequately refer to legislation administered by AAR.	Noted.	No alterations to EIR/SEO required.
5	**Civil Aviation Safety Authority (CASA)**		
5.1	CASA has reviewed the information provided and is not aware of any civil certified aerodrome for which an Obstacle Limitation Surface (OLS) would require protection, given that the nearest certified aerodrome is Port Augusta Airport which is over 7.9km away. Therefore, this development falls outside CASA's formal regulatory framework for aerodromes.	Noted.	No alterations to EIR/SEO required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
5	**Civil Aviation Safety Authority (CASA)**		
5.2	CASA is also unaware of any unregulated aerodrome which may not published in the Aeronautical Information Publications being within 2.5km.	Noted.	No alterations to EIR/SEO required.
5.3	Given the proposed BESS will be less than 10m above ground level (AGL) and provided that there is no impact identified on any unregulated aerodromes, CASA is not recommending any lighting or marking requirements for this proposed BESS.	Noted.	No alterations to EIR/SEO required.
5.4	CASA agrees with the "*Environmental Impact Report (EIR) Northern Battery"*, prepared by Davenport BESS Pty Ltd., that "*Construction and operational activities of the BESS are unlikely to be of a height or form that would impact upon aircraft utilising either of these airfields. However, the development would need to satisfy any relevant aviation legislative requirements".* Should any construction equipment or temporary works have the potential to impact operations at Port Augusta Airport, a separate application to CASA would be required.	Noted.	No alterations to EIR/SEO required.
6.0	**South Australian Country Fire Service (CFS)**		
6.1	The site is located within the Hazards (Bushfire – Regional) Overlay (of the Planning and Design Code).	The subject land is within the Hazards (Bushfire – Regional) Overlay of the Planning and Design Code and the policies of this Overlay are being utilised as a guide for the CFS comments. Interpretation and application of the performance features by the CFS are one-way of achieving the policy intent of the Planning and Design Code Overlay. It is however important to note that a BESS (and renewable energy) facility is not a land use that would require referral and assessment by the CFS if the application was to be determined pursuant to the *Planning, Development and Infrastructure Act 2016*. Subsequently the final design of the BESS should be undertaken with reference to the Overlay policy in consultation with the CFS.	The CFS is a prescribed referral body pursuant to the Fire and Emergency Services Act 2005. The EIR and SEO have addressed comments raised by the CFS and include the following: -Compliance with the SA CFS Design Check List. -Compliance with the relevant Hazards (Bushfire - Regional) Overlay policies of the Planning and Design Code. -Site familiarisation (induction) with the local CFS prior to construction. -Development of a Fire Management Plan in consultation with and to the satisfaction of the SA CFS prior to operation, to be included in the OMP. No alterations to the EIR/SEO is required.
6.2	CFS previously provided the proponent with the CFS Renewable Energy Checklist. CFS notes that matters still requiring confirmation/achievement in final design include: • Inclusion of a second exit. • Repositioning of the retention pond to allow for easy access around the asset protection zone (APZ). • Sufficient firefighting capability for all BESS units within a 90m radius of the water source. • Internal road design.	The final design of the BESS will reference the CFS Renewable Energy Facilities Checklist and specifically address vehicle movements (internal road design, secondary site exits, asset protection zone, and water supply. The proponent has prepared an initial response to the Renewable Energy Facilities Design Checklist and liaised with the CFS. In finalising the design, further consultation will be undertaken with the CFS. Currently EIR control measures – Fire Management: Impact ID#FM3 incorporates reference to the design addressing the CFS Renewable Energy Checklist, along with preparation of Emergency Management Plans.	Amendments made to all references in the EIR/SEO, in particular: • EIR 5.2.6.1 (Table 16) • EIR Impact ID#FM1 - Control Measure, Assessment Criteria and Leading Performance Criteria • EIR Impact ID#FM2 - Control Measure, Assessment Criteria and Leading Performance Criteria • EIR Impact ID#FM3 - Control Measure, Assessment Criteria and Leading Performance Criteria • EIR Impact ID#FM4 - Control Measure, Assessment Criteria and Leading Performance Criteria
6.3	SACFS recommends all buildings and infrastructure such as Substation, Inverter stations, BESS and Control Buildings or other similar assets, should be located no less than 19 metres from the property boundaries/site boundary perimeter fence or existing vegetation being retained, for the purposes of maintaining an APZ and to achieve maximum exposure of no more than BAL 12.5 kW/m².	The final site layout will incorporate asset protection zones. Buildings will be constructed in accordance with the National Construction Code – as referenced in EIR control measures – Fire Management: Impact ID#FM3.	No alterations to EIR/SEO required.
6.4	Vegetation management shall be established and maintained within 19 metres of each Substation/Control Building/BESS.	As per 6.2 above.	No alterations to EIR/SEO required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
6.0	**South Australian Country Fire Service (CFS)**		
6.5	SA CFS seek to restrict vegetation 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.	These requirements do not appear to reflect the location and form of vegetation proposed for screening purposes. As per 6.1 above, the final design will incorporate asset protection zones whilst incorporating vegetation sought for visual screening.	Proposed Landscape Plan (LandSkap 2025, Visual Impact Assessment, Page 12) shows a Landscape Zone proposed around the boundary of the site and which sits wholly outside of the Asset Protection Zone of 10m in width that surrounds the BESS infrastructure. In addition, a 2.1 metre high chain mesh fence will sit between the Asset Protection Zone and any landscaping. No alterations to EIR/SEO required.
6.6	CFS note that there is reticulated water in the area however this 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.	Noted and static water supplies will be incorporated into the final design.	No alterations to EIR/SEO required.
6.7	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.	Noted and the OMP will establish appropriate review of documentation.	No alterations to EIR/SEO required.
6.8	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.	Noted and reference to a manifest box has been included in EIR control measures – Fire Management: Impact ID#FM3.	Amended wording in EIR control measures – Fire Management: Impact ID#FM3.
6.9	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.	Currently EIR control measures – Fire Management: Impact ID#FM3 references construction in accordance with the NCC.	No alterations to EIR/SEO required.
6.10	CFS notes the reference to onsite worker accommodation and requests that all accommodation buildings are appropriately compliant for the intended use.	Onsite workers accommodation is referenced as one option and not part of the project. Any proposal for workers accommodation on the subject land would be subject to a separate AIL.	No alterations to EIR/SEO required.
7.0	**Vicki Hewett (member of the public and resident of 40 Port Paterson Road, Port Paterson)**		
7.1	Notes that consultation process with local residents was respectful and constructive.	Noted.	No alterations to EIR/SEO required.
7.2	Project related traffic will utilise Old Power Station Road and not Port Paterson Road. This vehicle movement network is appropriate.	Noted.	No alterations to EIR/SEO required.
7.3	Dust management includes provision to stop work on days that may adversely impact nearby residents.	Noted.	No alterations to EIR/SEO required.
7.4	Site is appropriate given it was previously disturbed and unlikely to significantly affect native flora and fauna along Port Paterson Road.	Noted.	No alterations to EIR/SEO required.
7.5	The project will not have a substantial negative impact on rural living lifestyle and wellbeing.	Noted.	No alterations to EIR/SEO required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
8.0	**Department of Primary Industries and Regions (PIRSA)**		
8.1	PIRSA acknowledge that the proponents recognise the accommodation constraints within Port Augusta and the wider region, particularly given the number of major projects currently proposed. PIRSA support the proponents working collaboratively with Council to effectively meet workforce needs, reduce cumulative impacts on the community, build local confidence, and support, and leave a more positive legacy for the region.	Noted.	No alterations to EIR/SEO required.
8.2	EIR pg 29 – 4.2.1 Surface Water – "Whilst the SAPPA and NatureMaps show water within the boundaries of the subject land, none will be impacted by the Northern Battery facility." Water may not be impacted by the facility, however the facility maybe impacted by water under certain scenarios; what is the risk of, not just surface but also marine waters impacting the site?	Refer 1.4 above.	No alterations to EIR/SEO required.
8.3	EIR pg 70 – 4.8.6 – Community Benefit Program - Initially Community Benefit is $40,000pa to support a variety of local projects, will a percentage be allocated to First Nations initiatives or is there separate funding for First Nations? What is the proposed long-term benefit sharing? (see below Objective 9)	The Proponents are committed to building respectful, enduring and mutually beneficial partnerships with First Nations peoples across Australia, working with First Nations peoples as empowered participants and partners in Australia's clean energy future. The Proponents have also commenced discussions with Traditional Owners, the Nukunu people, to develop a meaningful partnership for delivery of the project. This approach will build off AMPYR's award-winning First Nations equity partnership for the Bulabul Battery in Wellington NSW, to provide intergenerational benefits through a long-term equity revenue stream.	No alterations to EIR/SEO required.
8.4	EIR pg 91 – 5.2.6.4 – Fire management requires identification of water storage, however identification of water sources and quality for the site is required, i.e. will the water be sourced from SA Water or use other sources of water, i.e. recycled water or stormwater diversion?	Sourcing water supply is currently under investigation and may incorporate a combination of SA Water reticulated water and other sources, which may include transportation of water to the project.	EIR Section 3.1.2 added to include high-level water supply details.
8.5	SEO pg 13- Objective 10 – compliance with Landscape SA Act if dealing with the management of surface water, including stormwater.	Noted and *Landscape South Australia Act 2019* added to SEO Objective 10.	SEO Objective 10 – add reference to *Landscape South Australia Act 2019* in Assessment Criteria. Amendment to EIR WQES1, WQES2 & WQES3 Assessment Criteria.
8.6	SEO Pg12 – Objective 9 - Establish and operate a community benefit fund for the life of the project with a minimum annual contribution to the scheme of $150/MWh indexed for CPI annually; how is this determined?	The community benefit fund is determined by the Proponent. Refer discussion in 8.3 above and 13.2 below.	No alterations to EIR/SEO required.
9.0	**Department for Housing and Urban Development (DHUD)**		
9.1	**Land Use** The subject site is located within the Strategic Employment Zone of the Planning and Design Code (the P&D Code). The zone envisages a range of industrial, logistic, storage, research and training land uses that generate wealth and employment (DO1). A renewable energy facility (other than a wind farm) is envisaged in the zone (PO1.1). The subject site abuts the Rural Living Zone to the east, which envisages residential development. DTS/DPF 1.2 (of the SE Zone) provides a list of 'appropriate' land uses for land abutting a residential zone, and a renewable energy facility is not listed. Notwithstanding, the proposed development footprint of the BESS is set back over 300m from the eastern site boundary, which will assist in mitigating interface impacts. The locality is characterised by electricity infrastructure (substations, transmission lines and towers) with numerous renewable energy facilities proposed and/or approved. To the north of the proposed BESS site on Northern Power Station Road, within the Rural Living Zone, are two approved solar farms,		

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
9.0	**Department for Housing and Urban Development (DHUD)**		
	one constructed and the other in the early stages of site mobilisation. In this respect the proposal is generally consistent with the existing pattern of development in the locality. **Recommendations** • If a licence is granted, conditions(s) relating to decommissioning should be included, to facilitate the removal of infrastructure and return of impacted land to its existing condition (if desired by the land owner).	Noted.	No alterations to EIR/SEO required.
9.2	**Planning and Design Code** The 'Infrastructure and Renewable Energy Facilities' module of the P&D Code provides guidance for BESS developments. Development should minimise hazards, be environmentally and culturally sensitive, and manage adverse impacts on natural landscapes are residential amenity. The EIR includes an assessment against relevant provisions of the P&D Code. Key points are summarised below. Setbacks and Interface Impacts The subject site is adjacent to the Rural Living Zone. The nearest sensitive receiver (within the Rural Living Zone) is over 500m south-east of the proposed BESS footprint. Potential impacts to sensitive receivers within the adjacent Rural Living Zone include noise, light, visual intrusion and construction impacts. These impacts are given detailed consideration in the EIR and reflected in the SOE with appropriate assessment criteria and leading performance criteria, including: • The site is located within a low lying, previously excavated area which will reduce visual impact. • Landscaping is proposed around the perimeter of the facility. The landscaping approach should have regard to local conditions, in order to maximise success of vegetation growth. • Noise emissions to meet Noise EPP criteria during both construction and operation. • CEMP and OMP to incorporate dust management controls. Infrastructure The BESS is located near Davenport substation, with the connecting transmission line to be undergrounded, which will minimise the extent of transmission lines required for grid connection. The EIR states that road infrastructure upgrades will not be required, noting that access to the development site is via Northern Power Station Road (sealed, no kerbs). Temporary traffic control measures will be required during construction. Environment and Heritage The BESS footprint is within a disturbed area, previously used as a borrow pit. The BESS proposal requires the removal of 6.7ha of native vegetation, the majority of which has naturally regenerated on the site. There is an Aboriginal artefact scatter site within the subject land, but not within the BESS development site. The Applicant is working with Traditional Owners to undertake a full cultural heritage assessment and develop a Cultural Heritage Management Plan. Discovery protocols will be incorporated into the CEMP and OMP. Hazards The subject site is within the Bushfire – Regional Overlay. Vehicular access to the site is from Northern Power Station Road, via a private site access driveway. The final layout of the development should	Noted. Additional control measure included in EIR Visual Impact: Impact ID #VI2. Control measure relating to noise modelling, mitigation and monitoring are included in EIR Noise: Impact ID #'s 1, 2 and 3. Amended leading performance criteria relating compliance and consultation with the SA CFS is included in EIR Fire Management: Impact ID #'s 1, 2, 3 and 4.	Additional control measure added to EIR Visual Impact: Impact ID #VI2. External lighting of buildings, structures and site to be low intensity and designed to limit spill in accordance with Australian Standard AS/NZS 4282. EIR Visual Impact: Impact ID #VI2 and SEO Objective 12 additional leading performance criteria included: • External lighting of buildings, structures and site designed to limit spill in accordance with Australian Standard AS 4282:2023 – Control of Obtrusive Effects of Outdoor Lighting. EIR Noise: Impact ID #3 and SEO Objective 8 additional leading performance criteria included: • Undertake a post construction noise survey to ensure compliance with the Environment Protection (Commercial and Industrial (Noise) Policy 2023. EIR Fire Management: Impact ID #'s 1, 2, 3 and 4, control measures and assessment measures have been updated to reference compliance with SA CFS Guide: Renewable Energy Facilities – Solar, Battery Storage Systems & Wind Generation (Version 1).

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
9.0	**Department for Housing and Urban Development (DHUD)**		
	facilitate access within the site and incorporate firefighting water (and equipment) as required by the CFS. The project footprint is within an area of known groundwater contamination, associated with the former Port Augusta Power Sation to the west. The PSI prepared for the EIR concludes that it is considered highly unlikely that contamination would pose a risk to human health or the environment at the development site. Notwithstanding, the CEMP should include appropriate protocols for spoil and groundwater management during ground disturbing activities. **Recommendations** • External lighting to be low intensity (for security purposes) and designed to limit spill in accordance with relevant Australian Standards. • A post construction noise survey should be undertaken to confirm that actual noise levels meet the Noise EPP criteria. That CFS be consulted on the final site layout and operational management plan(s) to review the adequacy of mitigation measures.		
9.3	**Regional Plans** The current policy framework relevant for the subject site is the Far North Regional Plan (January 2026). The Far North is identified as a hub for renewable energy generation, as a key contributor to the region's economic profile. The long-term objections of the Plan are to support and facilitate renewable energy generation and storage, to contribute to a decarbonised economy and mitigate impacts of climate change. **Recommendations** NA	Noted.	No alterations to the EIR/SEO required.
9.4	**State Planning Policies** The proposal directly relates to State Planning Policy 12 (Energy) which seeks the facilitation of renewable energy facilities where the impact on surrounding land uses, regional communities and the natural and built environment can be minimised. Various other SPPs are relevant including SPP 4 which seeks to maintain and enhance South Australia's biodiversity and life supporting functions. The impact of the development on native vegetation and biodiversity will be considered under the *Native Vegetation Act 1991* and *EPBC Act 1999.* **Recommendations** NA	Noted.	No alterations to the EIR/SEO required.
9.5	**Previous Decisions** Development applications by Green Gold Energy for renewable energy facilities within the locality: • 660/117/2020: Application by Green Gold Energy for a 4.95MW solar farm at 2B Marks Road, Port Paterson – REFUSED by Upper Spencer Gulf Regional Assessment Panel on 21/02/2024. ERD Court appeal with a compromise accepted on 12 June 2024, however details of the compromise are unknown (*Green Gold Energy Pty Ltd v The Corporation of the City of Port Augusta [2024] SAERC 17 (25 June 2024)*). Unknown if Green Gold is proceeding with this development. • Crown sponsorship application by Green Gold Energy for a 272MW BESS at 2B Marks Road – not supported by DHUD, and Crown Sponsorship not granted by DEM.	Noted.	No alterations to EIR/SEO required.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
9.0	**Department for Housing and Urban Development (DHUD)**		
	• Unknown DA number: Application by Green Gold Energy for a 4.4MW solar farm at Lot 7 Northern Power Station Road, Port Augusta – APPROVED by City of Port Augusta on date unknown – construction complete.	Noted.	No alterations to EIR/SEO required.
9.6	**Other matters** n/a	N/A.	N/A.
10.0	**Office of Technical Regulator (OTR)**		
10.1	OTR advises that the Northern BESS project appears consistent with the OTR certificate issued.	OTR Certificate has been issued and is current.	No alterations to EIR/SEO required.
11.0	**Airservices Australia**		
11.1	The proposed activity does not impact Airservices operations or facilities.	Noted.	No alterations to EIR/SEO required.
11.2	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.	Noted.	No alterations to EIR/SEO required.
12.0	**Native Vegetation Council**		
12.1	NVC appreciates the proponents efforts to address previous comments. The proponent has adequately referred to and updated documentation to reflect previous Council advice, incorporating the recommended sources of indirect impacts on native vegetation and providing additional information regarding offset options and regeneration. After having sought advice regarding on-ground offsets, the proponent now proposes to address the significant environmental benefit via payment into the Native Vegetation Fund.	Noted.	No alterations to EIR/SEO required.
12.2	The Native Vegetation Council (the Council) has issued its preliminary advice regarding the formal clearance application pursuant to the NV Act. Previous advice raised no objection to the development, subject to the satisfaction of the Significant Environmental Benefit (SEB) obligations and AIL approval. The SEB requirement of 131.11 SEB points to be achieved by payment into the Native Vegetation Fund of $14,635.22 ($13,872.25 (GST exclusive) and $762.97 administration fee (GST inclusive)) has been calculated properly.	Noted. EIR Ecology: Impact ID #E1 incorporates control measures which include: • Limit vegetation clearing to that approved by Native Vegetation Council (NVC). • All vegetation clearing or disturbance is approved and undertaken in compliance with approved plans and relevant conditions (if any). • Any payment into the native vegetation fund is done so in accordance with the relevant assessment methodology and associated standards. SEO Objective 6 Leading Performance Criteria notes the need to pay SEB contribution. The proponent is aware of its obligations regarding payment of SEB into the native vegetation fund.	No alterations to EIR/SEO required.
12.3	NVC has indicated there is potential for the EIR to recognise the potential impact that native vegetation clearance may have on the following receptors: air quality; biodiversity; soil composition; surface water.	These potential impacts are acknowledged and considered to be generically covered in the EIR and references are considered appropriate given the nature of the development, its confined locality and current environmental condition.	Amendment of EIR Impact ID#E1 - Receptors.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
12.0	**Native Vegetation Council**		
12.4	NVC have commented that when discussing Upper Spencer Gulf Marine Park (see section 4.3), the EIR notes that, 'Native vegetation refers to any naturally occurring local plant species which are indigenous to Australia, from small ground covers and native grasses to large trees and water plants.' The Council notes that, under the NV Act, native vegetation is defined as a plant or plants of a species that is indigenous specifically to South Australia. This includes a plant or plants growing in or under waters of the sea. However, it does not include a plant or part of a plant that is dead, or a plant intentionally sown or planted (unless otherwise declared by the Act itself or its regulations). The Council encourages greater specificity when defining native vegetation.	The comments by NVC are noted, however Section 4.3 of the EIR is a general overview and not intended to be a discussion of the definition of native vegetation.	No alterations to EIR/SEO included.
13.0	**Port Augusta Council**		
13.1	Port Augusta Council (the Council) notes that the legal description of the land is inaccurate and the inconsistency presents a potential legal risk and exposes the statutory process to challenge.	In preparing the AIL application a search of the current Certificate of Title was undertaken and noted as Volume 6226 Folio 253. This Certificate of Title reference was applicable in October 2025 when the AIL was prepared. Since that time the Certificate of Tile has been updated to Volume 6325 Folio 957 (issued in December 2025). Copies of the CT at the time of lodgement of the AIL and the current CT are included in Attachment A of the EIR for clarity. The description of this land is unaltered, namely Allotment 8 in Deposited Plan 55700, Hundred of Davenport. It is considered that Council's concerns regarding the land description discrepancy is overstated, for the following reasons: • CT 6226/253 is the parent title of CT 6325/253 • The allotment and deposited plan reference is unaltered • All publicly available documentation, including the EIR clearly identified the land spatially as required by the HRE Act and Regulations, including land co-ordinates.	Reference in the EIR to the Certificate of Title has been updated.
13.2	Council considers the description of the receiving environment narrow with a focus on physical attributes and should include a socio-economic analysis. In particular, Council suggest an economic impact assessment addressing: • Potential inequities arising from reduced rate revenue compared to alternative developments; and • Mechanisms to offset such impacts, including developer contributions or other funding arrangements to support Council service provision.	The scope of the environment is considered to be appropriate and commensurate with the form and impact of development. Matters of rating and Council revenue are considered to be outside of the scope and requirements for HRE legislation. Developer contributions to the community are incorporated in the form of neighbour agreements and community benefit sharing, as discussed in Section 4.8.6 of the EIR. The community benefit program has been discussed with Council and this will be ongoing. Social Environment, land use and infrastructure: Impact ID #SOC2 – control measure: Community benefit initiatives to support community services/activities (community benefit scheme). SEO Objective 9 – leading performance indicator currently references a community benefit fund. The proponent proposes to update the wording relating to community benefits to reinforce the variety of options available for projects to the community, and also to specifically reference First Nations communities.	Alter SEO Objective 9 to read: Establish and deliver community benefit programs for the duration of the project. Programs may be delivered in partnership with Council or regional community associations and include funding for specific community initiatives, a community benefit fund or grants program, neighbour agreements, or targeted funding for First Nations communities. Over the life of the project, combined program contributions are expected to average between $100 and $150 per MWh annually, depending on the initiatives identified in consultation with Council and the community.
13.3	Council is concerned that the EIR and SEO exclude areas outside of the development footprint and consider details in relation to location and design of access road; construction standards of access and flood resilience of access are unclear.	The site of the development has been appropriately defined as required by the HRE legislation and this definitional approach varies for other land use applications that maybe considered under other legislation, such as the Planning, Development and Infrastructure Act (PDI Act).	No alterations to EIR/SEO included.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
13.0	**Port Augusta Council**		
		Vehicle access is appropriately defined in the Traffic Impact Assessment which accompanies the EIR. DIT have considered the proposed access route for the project and have no objection to the use of Augusta Highway and Northern Power Station Road to provide access to internal driveways. The internal driveways will be designed and constructed to satisfy all of the relevant environmental considerations established by the EIR and SEO. A final design will be prepared which details construction standards and addresses flood resilience. Again, the approach to satisfying these design matters vary from a standard land use application under the PDI Act. It is noted that the EIR incorporates several references to appropriate vehicle access to satisfy CFS requirements, which would ensure they are of a suitable design standard.	
13.4	Council comments on land tenure and governance and states that Leasehold arrangements alone may be insufficient to manage long-term obligations, particularly in relation to shared infrastructure. Alternative mechanisms should be considered, including: • Community Title arrangements to manage shared infrastructure and multiple land interests; or • A formal Land Management Agreement. Council recommends that legal arrangements be formalised and included within the EIR, with input from Crown Law as part of the assessment process.	It appears that these concerns relate to shared infrastructure within the site by various tenants. Respectfully it is considered that lease arrangements between the proponent and the landowner and other tenants of the subject land is outside of the scope of the AIL and more specifically the EIR and SEO. Furthermore, the use of a Land Management Agreement or Community Title have no role to play in this development as it is not being assessed or approved under the Planning, Development and Infrastructure Act. DEM will assess the information included in the AIL, EIR and SEO against the criteria of the HRE legislation. Evidence of the lease arrangements have been provided to DEM and further legal arrangements in this process are considered unwarranted.	No alteration to the EIR/SEO required.
13.5	Council has sought further clarification regarding internal access relevant to another development (Hallett site) on the subject land and responsibilities for construction and ongoing maintenance of the internal road infrastructure.	It is acknowledged that provision of suitable internal access for the development is appropriately provided, which is discussed in the Traffic Impact Assessment and will form part of the final design. Further confirmation regarding final design is included in EIR Traffic Impact ID #T1 and SEO Objective 9. The matters of responsibility and maintenance between tenants of the subject land is considered to be a matter for discussion and agreement with the landowner (and other tenants) and not a matter to be resolved as part of the EIR.	Amend EIR Traffic Impact ID #T1 and SEO Objective 9 to include: Final detailed design of the project to include internal road network and addresses any shared access, CFS requirements and flood mitigation (if/as necessary)
13.6	Access infrastructure must be designed to maintain functionality during a 1% AEP flood event, including sea level rise impacts during the operational life of the project, and be secured through legally binding agreements that extend beyond current ownership arrangements.	The final design of the project will further consider access and potential impact from flooding. Analysis undertaken by WGA in the Stormwater Management Strategy which informed the EIR. This analysis focused on the BESS site and did not specifically address the access, however, indicates that there will be minimal inundation within the site boundary in a 1% AEP event.	As per 13.5 above, amended wording in EIR Traffic Impact ID #T1 and SEO Objective 9.
13.7	Council considered that flood risk and mitigation was not adequately addressed in the EIR.	The Stormwater Management Strategy prepared by WGA which informed the EIR reviewed the available floor mapping which has previously been prepared by Water Technology, 2020). WGA noted that the available flood mapping for the 1% annual exceedance probability (AEP) event indicates that the site is in an area which is subject to shallow flooding (refer Figure 2 of the WG report). The maps indicate that while there are areas of inundation around the site, there is likely to be minimal inundation within the site boundary in a 1% AEP event. WGA acknowledge that while the results of the previous flood study	Amend ERI Water Quality. Erosion and Sedimentation: Impact ID # WQES2 and SEO Objective 10 to include: • Undertake surface water and flood risk assessment to inform final design taking account of potential impacts of climate change.

	Summary of Submission	Discussion and Response	Reference to Response in EIR/SEO
13.0	**Port Augusta Council**		
		provide a useful guide as to the potential inundation levels and associated flood risk, they recommend that independent, project specific flood modelling be carried out in detailed design and the potential impacts of climate change on flooding should also be considered. The final design of the project will further consider potential flooding and this has now been reflected in the EIR and SEO.	
13.8	Council indicated that should the flood investigations result in the alteration of site levels that it may impact on noise modelling undertaken and may require reassessment.	It is acknowledged that changes in site levels may impact noise modelling. The final design of the project, post selection of models of batteries and inverters will require further noise modelling, as stated in the EIR (Noise Impact ID #N3) - Noise modelling required prior to finalisation of design with selected models of batteries and inverters.	No alteration to EIR/SEO required.

Further information

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Department for Energy and Mining

