



Consultation by the Minister

Plains BESS



Department for Energy and Mining

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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:
14/10/2026	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 - Plains BESS EIR and SEO

In accordance with the Act and Regulations, the **Plains 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 28 February 2026 and 15 April 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* (28 February 2026), *The Leader* (4 March 2026) and *Plains Producer* (4 March 2026).

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

- Attorney Generals Department – Aboriginal Affairs and Reconciliation (AAR)
 - Commissioner of Highways (DIT)
 - Department for Environment and Water (DEW)
 - Department of Primary Industries and Regions (PIRSA)
-

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- Department for Housing and Urban Development (DHUD)
 - Native Vegetation Council (NVC)
 - DEM Office of the Technical Regulator (DEM-OTR) and Mining Regulation Branch
 - South Australian Country Fire Service (CFS)
 - Goyder Regional Council

One public submission was received pursuant to regulation 39. Responses were received from referral bodies pursuant to regulation 40 from AAR, DEW, PIRSA, DHUD, NVC, DEM-OTR, CFS and Goyder Regional Council. 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

Application ID	23302417
Created	14/04/2026 11:08 AM
Modified	14/04/2026 11:14 AM

Name	Sarah Binns
Email	binnsy2013@live.com
Which sections of the EIR and/or SEO does your feedback relate to?	All
Attachments	Plains Battery Energy Storage System (BESS) Response.pdf

Department for Energy and Mining, Government of South Australia
GPO Box 618
Adelaide, South Australia 5001

Re: Associated Infrastructure Licence Application – Plains Battery Energy Storage System (BESS)

To: Department for Energy and Mining, Government of South Australia,

I write to formally oppose the proposed Plains Battery Energy Storage System (BESS) at Rocky Plains, South Australia.

This submission is made with regard to the assessment framework under the Hydrogen and Renewable Energy Act 2023 (SA) (the Act), including the requirement that projects demonstrate appropriate environmental, social, and safety outcomes, and are consistent with the broader public interest.

Failure to satisfy the objects and assessment criteria of the Act

The Act requires that renewable energy infrastructure be developed in a manner that avoids or minimises environmental harm, protects community safety, and delivers a net public benefit. Given the scale of the proposal, unresolved concerns remain regarding risk minimisation and long-term impacts. The precautionary principle—well recognised in Australian environmental law—requires that where there is scientific uncertainty and risk of serious harm, decision-makers should err on the side of caution. This principle was articulated in *Telstra Corporation Limited v Hornsby Shire Council*, which confirms that lack of full scientific certainty should not delay preventative measures (*Telstra Corporation Limited v Hornsby Shire Council*, 2006).

Safety risks and inconsistency with risk management obligations

The Act requires that proponents demonstrate that risks to public safety are adequately mitigated. Peer-reviewed research confirms that lithium-ion BESS installations present significant hazards, including thermal runaway, fire, explosion, and toxic gas emissions (Edwards & Dobson, 2025; Zhang et al., 2023; Wang et al., 2025). These risks are amplified at large scale and present particular challenges for emergency response (Liu et al., 2024; U.S. Environmental Protection Agency [EPA], 2024). In *Walker v Minister for Planning*, the Court emphasised that decision-makers must properly consider environmental risks and their consequences (*Walker v Minister for Planning*, 2007).

Ecological impacts and biodiversity risk

The Act requires avoidance and minimisation of environmental impacts, including impacts on biodiversity and ecosystems. The proposed development may result in vegetation clearance, habitat fragmentation, and disturbance to native fauna. Ecological research demonstrates that habitat fragmentation can significantly degrade ecosystem function even where clearing

is partial. The importance of considering indirect impacts was affirmed in *Minister for Environment and Heritage v Queensland Conservation Council* (Minister for Environment and Heritage v Queensland Conservation Council, 2004).

Land use conflict and rural amenity

The Act requires consideration of impacts on land use and local communities. The introduction of a large industrial facility into a rural agricultural setting raises concerns regarding visual impact, noise, and rural character. These impacts are recognised in planning law as valid grounds for refusal where inconsistent with locality character, as demonstrated in *Newcastle & Hunter Valley Speleological Society Inc v Upper Hunter Shire Council* (Newcastle & Hunter Valley Speleological Society Inc v Upper Hunter Shire Council, 2010).

Lifecycle, decommissioning, and environmental legacy

The Act requires that infrastructure be managed across its full lifecycle. Battery degradation, hazardous waste, and disposal challenges present ongoing risks (Zhao et al., 2022; Vykhodtsev et al., 2021). End-of-life battery management is an emerging global environmental issue, with increasing volumes of waste requiring specialised handling (Wu, 2026).

Economic benefit versus public risk

While the proposal may deliver grid benefits, long-term local economic gains are likely limited. Where risks remain significant and uncertain, it is not clear that the proposal delivers a net public benefit consistent with the Act. For these reasons, the Plains BESS proposal:

- does not adequately minimise environmental and safety risks
- fails to demonstrate consistency with the precautionary principle
- raises significant ecological and land-use concerns
- presents unresolved lifecycle risks

Accordingly, approval would be inconsistent with the objects and intent of the Hydrogen and Renewable Energy Act 2023 (SA).

I respectfully request that the application be refused or deferred pending further assessment and stronger safeguards.

Kind regards,

Sarah Binns BBus (Mgmt & HRM)
Robertstown Property Owner
binnsy2013@live.com

References

Edwards, P. P., & Dobson, P. J. (2025). Remarks on the safety of lithium-ion batteries for large-scale battery energy storage systems. *Fire Technology*.

<https://doi.org/10.1007/s10694-024-01682-x>

Liu, Z., et al. (2024). Advances in safety of lithium-ion batteries for energy storage systems. *Energy Reviews*.

Minister for Environment and Heritage v Queensland Conservation Council (2004) 139 FCR 24 (High Court of Australia).

Newcastle & Hunter Valley Speleological Society Inc v Upper Hunter Shire Council (2010) NSWLEC 48.

Telstra Corporation Limited v Hornsby Shire Council (2006) NSWLEC 133.

U.S. Environmental Protection Agency. (2024). Battery energy storage systems: Key safety considerations. <https://www.epa.gov>

Vykhodtsev, I., et al. (2021). Techno-economic modelling of battery energy storage systems. <https://arxiv.org/abs/2106.08702>

Walker v Minister for Planning (2007) 157 LGERA 124.

Wang, Q., et al. (2025). Advances in fire safety of lithium-ion battery energy storage systems. *Energy Reports*.

Wu, D. (2026). Fire and explosion hazards in lithium-ion battery lifecycle. *Fire*, 9(2), 76.

Zhang, Y., et al. (2023). Hazard analysis of lithium-ion battery energy storage systems. *Journal of Loss Prevention in the Process Industries*.

Zhao, X., et al. (2022). Battery degradation modelling and implications for energy storage systems. <https://arxiv.org/abs/2211.12481>

OFFICIAL

From: [REDACTED]
Sent: Tuesday, 14 April 2026 4:16 PM
To: [REDACTED]
Cc: AAR:Correspondence <AAR.Correspondence@sa.gov.au>; [REDACTED]
[REDACTED]
Subject: RE: HRE Act referral - Request for comment: Plains BESS

Dear [REDACTED],

Thank you, for your email to Aboriginal Affairs and Reconciliation (AAR) on 2 March 2026 and 7 April 2026 requesting comments on the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) covering the Plains Energy Project Pty Ltd application for a licence to construct and operate the Plains BESS.

The EIR states that no heritage is recorded at the site. The central archives and the Register are not an exhaustive record of Aboriginal heritage in South Australia. Undiscovered or unrecorded Aboriginal heritage may still exist within a search area, even if it is not recorded in the archives, as the EIR also acknowledges.

The unexpected finds protocol to be developed should as a minimum be consistent with the attached Aboriginal Heritage Discovery Protocols. All discoveries of suspected human remains must be reported first to SAPOL. Discoveries of other Aboriginal heritage must be reported to the Minister via Aboriginal Affairs and Reconciliation per section 20 of the *Aboriginal Heritage Act, 1988 (AH Act)*.

In the event that Aboriginal heritage is discovered and cannot be avoided, authorisations under the *AH Act* will need to be obtained. It is best practice to continue consultation with Traditional Owners through the application for authorisations process. This requirement should be included in Proposed Controls/Management Approach at Table 32.

Sincerely,

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

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

Attorney-General's Department Disclaimer:

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DEW-D0034539



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

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

Dear [REDACTED]

Project: Plains Battery Energy Storage System (BESS)
Application: Associated Infrastructure Licence (AIL) under the HRE Act
Applicant: Plains Energy Project Pty Ltd
Location: 1844 Plains Road, Rocky Plains SA 5381
CT 5438/739, Parcel ID H120800 S349
Approximately 6 km south-east of Robertstown in the Mid-North region

Thank you for your email dated 2 March 2026 inviting the Department for Environment and Water (DEW) to comment on the application from Plains Energy Project Pty Ltd for an Associated Infrastructure Licence (AIL) under the *Hydrogen and Renewable Energy Act 2023* (HRE Act) for the Plains Battery Energy Storage System (BESS) project.

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

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

- The applicant has considered most of DEW's comments through pre-lodgement and updated the draft EIR and SEO accordingly in relation to water requirements and management plan details, noting that native fauna management during the operational stage of the development remains to be addressed.
- A Native Vegetation Clearance Data Report was not yet available for review.

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- The project site is on rural land that is highly disturbed and historically used for grazing and dryland cropping land with limited native vegetation and the applicant will apply to the Native Vegetation Council for any anticipated native vegetation clearance.
- There is a low likelihood of State listed fauna species being present on the site and it is noted the applicant amended the EIR and SEO to address management of native fauna on the site for the stages of construction and decommissioning although DEW recommends this is also addressed at the operational stage to fully comply with the *National Parks and Wildlife Act 1972* requirements.
- Minor amendments to the environmental objectives are recommended to include adequate assessment criteria and leading performance criteria for native fauna and non-Aboriginal heritage.
- There is low risk of encountering archaeological features of potential significance on the project site and it is supported that additional detail is added to ensure measures are in place to protect any potential heritage values found during any stage of the project's 25–30-year life span.

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

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

Yours sincerely

[REDACTED]

CHIEF EXECUTIVE

06/05/2026

Attachment A: DEW submission – Plains BESS Project

Attachment A – Department for Environment and Water submission – Plains BESS Project

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

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

Project Name: Plains Battery Energy Storage System (BESS) Project

Applicant: Plains Energy Project Pty Ltd (a subsidiary of Enduring Group Pty Ltd) (the applicant)

Application: Associated Infrastructure Licence (AIL) – the applicant is proposing to contribute to South Australia’s renewable energy targets by developing four stages of BESS to facilitate 1000 megawatts (MW) / 5000 megawatt-hours (MWh) of energy storage. The applicant will also construct an associated project substation and ancillary infrastructure.

Location: 1844 Plains Road, Rocky Plains, SA, 5381, CT 5478/739, Parcel ID H120800 S349

Approximately 6km south-east of Robertstown and 134 km north-east of Adelaide, in the Mid-North Region of South Australia

Project Area: The Project Area is proposed to be sited on one parcel of land totalling approximately 215 hectares (ha) in area.

The Project Area is currently designated as a Rural Zone with a long history of disturbance associated with livestock and dryland cropping that is located within the Regional Council of Goyder Local Government Area, the Northern and Yorke Landscape Management Region and the Ngadjuri Nation.

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

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

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

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

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

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

Report Reference / DEM questions / Value	Topic / Comments					
Applicant responses to DEW's comments on pre-lodgement draft EIR & SEO EIR Pg 136	6	Department of Environment and Water	10/12/25	Biodiversity values Seek to review the draft data report: Water Resources Any use of water for construction on site or concrete batching from water sources needs to be included in the EIR Provided further advice and contact details to assist with issues relating to water resources, native vegetation, wildlife permits.	A Draft data report can be provided to DEW. It is confirmed that the project will not require a temporary batch plant and all water requirements will be trucked to site. Advice has been included in the evaluation tables in the EIR Contact details have been recorded and will be included in the OMP – which will inform all management plans for all phases (construction, operation and decommissioning).	EIR Chapter 2.3, p6 Tables F1 – Fauna, WC1 – Water Course SEO Tables F1 and WC1
	The Department for Environment and Water (DEW) notes and appreciated amendments made by the applicant following the pre-lodgement comments made by DEW dated 10 December 2025 which included: 1. water requirements will be trucked to site and no temporary batch plant required; 2. a data report can be provided to DEW; and 3. advice and contact details have been included in the evaluation tables in the EIR have been updated to address issues related to native fauna, native vegetation and water resources. DEW notes that native fauna is not included in the SEO within table F1 for the Operational Management Plan (OMP). Whilst there may be lower risk of injury or impacts to native fauna during this stage DEW recommends the OMP is included in this section to ensure management or injuries to native animals is adequately addressed during the operational stage, for example in the case of entanglement of native fauna in fencing or injury from vehicle movement. DEW would welcome to receive a data report when this becomes available, noting that the providing is mainly in relating to native vegetation matters which is a matter for the Native Vegetation Council (as detailed below).					
Existing Environment	Has the applicant adequately described the existing environment, as far as this is relevant to the proposed operations? DEW agrees with the evaluation of the existing environment, noting the details provided above to address native fauna management and heritage information further in this document. The Department for Environment and Water (DEW) notes and recommends the following: <u>Heritage – Non-Aboriginal</u> • DEW agrees with the applicant’s assessment of no known heritage impacts on the project site or within close proximity. Due to this, DEW considers there is a low risk of the project encountering archaeological features of potential significance although DEW recommends measures to protect any potential heritage values found during any stage of the project’s 25-30 year life. <u>Native Vegetation</u>					

	<i>Note: The Native Vegetation Council assess native vegetation clearance matters. This is not a matter for DEW.</i>
Potential Impacts	Has the applicant adequately identified the potential impacts on the environment that may arise from the proposed operations? DEW notes that updates have been made at pre-lodgement stage and reinforces the following: - During each stage of the proposed development and any investigations or assessments on the project site, should the applicant need to catch, move, relocate or destroy any protected animal or eggs, the applicant is required to apply for a permit under South Australian legislation to DEW. Further information can be obtained at DEW's website to apply for a permit to capture, release or destroy wildlife at: https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/capture-release https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/destroy <u>Heritage - Non-Aboriginal</u> - As described in above section, DEW considers there is a low risk of the project encountering archaeological features of potential significance. Despite the risk being considered low for encountering archaeological features of potential significance, DEW advises that the EIR and SEO need to include measures to ensure that, any historical archaeological feature uncovered during any stage of the project is protected and managed in accordance with the <i>Heritage Places Act 1993</i>. Further to this, any activities authorised under the <i>Hydrogen and Renewable Energy Act 2023</i> must not contravene the requirements of the <i>Heritage Places Act 1993</i>. - DEW recommends that all management plans include the following risk mitigation strategies for historical archaeology: - Completion of supporting heritage impact assessment - Development of a CEMP and OMP with project specific management and mitigation measures to include: - All workers to undergo site inductions for historical archaeology - Implementation of an unexpected historical archaeology discovery procedure (stop work, engage archaeologist to assess significance of the find, and recommence work only once authorisation received from the archaeologist) - Immediate reporting to DEW if a site/object of heritage significance is disturbed without appropriate permit/approval - Reporting to DEW of any other event where unknown historical heritage is discovered. <u>Native Vegetation</u> <i>Note: The Native Vegetation Council assess native vegetation clearance matters. This is not a matter for DEW.</i> - The EIR states that no native vegetation clearance issues are anticipated.

Environmental Objectives	Are the proposed environmental objectives acceptable? DEW notes and recommends the following: • The SEO is amended related to prescribed acts under DEW's administration and adequately complete the corresponding assessment criteria, leading performance criteria and control measures: ○ F1 is amended to include that "No disturbance to native fauna unless prior approval under the relevant legislation is obtained" ○ Minimise greenhouse gas emissions during construction, operation, decommissioning and rehabilitation phases ○ No damage, disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and places unless authorised under the relevant legislation • The SEO has an appropriate immediately reportable incident related to adverse impacts on biodiversity.
Mitigation Measures	Are the proposed mitigation measures practical and likely to achieve the desired objectives? Further to details described above under Potential Impacts, DEW recommends and notes the following: <u>Native Fauna</u> • Impacts and mitigation measures on native fauna are recommended to be reconsidered to include impacts at the operational stage of the project in relation to the management of native fauna, including potential risk of injury due to factors such as collisions with vehicles or any entanglement in fencing or other infrastructure. • DEW recommendations regarding permits required to catch, move, relocate or destroy any protected animal or eggs need to be incorporated in the mitigation measures and withing relevant management plans during each stage of the proposed development and any investigations or assessments on the project site. Further, to manage situations where there is injury to native fauna, management plans need to incorporate relevant assessments and procedures. For <u>Heritage – Non-Aboriginal</u> – please refer to section above.
Assessment Criteria	Are the proposed assessment criteria suitable to demonstrate achievement of the proposed objectives? As recommended above DEW recommends updating the SEO and EIR in relation to Native Fauna management to including "Applicable Non-Legislated Standards" and include the following codes of practice for humane destruction of wildlife where relevant for any injured native animal on site which is located at: https://www.environment.sa.gov.au/topics/animals-and-plants/animal-welfare/codes-of-practice/codes-of-practice-humane-destruction-wildlife ○ Native Birds - https://cdn.environment.sa.gov.au/environment/docs/cop_humanedestructionbirds.pdf ○ Wombats – https://cdn.environment.sa.gov.au/environment/docs/cop-wombat-2018.pdf ○ Common brushtail possum – https://cdn.environment.sa.gov.au/environment/docs/cop_possum.pdf ○ Flocking birds - https://cdn.environment.sa.gov.au/environment/docs/cop_flockingbirds.pdf

	○ Kangaroos and Wallabies – https://cdn.environment.sa.gov.au/environment/docs/code-of-practice-kangaroos-wallabies-non-commercial.pdf The <i>Animal Welfare Act 1985</i> can be referred to if there is not a relevant code on DEW's website and additionally advice for management of wildlife can be referred to within Table 5.2 with a link to the DEW's website advice located at https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife and species specific information on the native fauna including: Grey-headed flying foxes - https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/grey-headed-flying-foxes Snakes – https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/snakes Possums – https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/possums Wombats - https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/wombats Little Corellas - https://www.environment.sa.gov.au/topics/animals-and-plants/living-with-wildlife/little-corellas
	Contact details
Contact details	<u>Department for Environment and Water</u> Planning and Assessment Team Contact: [REDACTED], Coordinator Assessments Email: DEWPlanningandAssessment@sa.gov.au
Contact details	<u>Native Vegetation</u> For any clearance of native vegetation that is associated with this project, approval will need to be sought from the Native Vegetation Council (NVC) in accordance with the <i>Native Vegetation Act 1991</i>, and its regulations. The Native Vegetation Branch within DEW supports the NCV. For native vegetation clearance application information, the contact details are below. Contact: Native Vegetation Branch Native Vegetation & Pastoral Management Division Department for Environment and Water Email: DEWNV@sa.gov.au Phone No: (08) 8303 9777



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[REDACTED]
Senior Environmental Compliance Officer
Department for Energy and Mining

Email: [REDACTED]
DEM.EnergyRegulation@sa.gov.au

Dear [REDACTED]

Thank you for the referral for the Plains Battery Energy Storage System in accordance with section 73 of the *Hydrogen and Renewable Energy Act 2023*.

As the authorised and delegated representative of the Minister for Primary Industries and Regional Development under section 73 of the *Hydrogen and Renewable Energy Act 2023*, I provide the following feedback on the draft Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO):

PIRSA notes that the property is used for livestock production and that the proponent has considered pathogen risks associated with the project, however the documentation does not reference contamination risks to livestock. Consideration of contamination risks to livestock should be made especially as there is a mandated referral relating to the *Livestock Act 1997*.

Should you require any further information, please contact the Office of the Chief Executive at PIRSA.OCE@sa.gov.au in the first instance.

Thank you for the opportunity to comment on this matter.

Yours sincerely

[REDACTED]
[REDACTED]
CHIEF EXECUTIVE

15/04/2026

From: [REDACTED] (DHUD)
To: [REDACTED] (DEM)
Cc: DHUD:Crown Impact Assessment
Subject: RE: HRE Act referral - Request for comment: Plains BESS
Date: Monday, 13 April 2026 3:28:26 PM
Attachments: [image001.gif](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)
[image017.png](#)
[image018.gif](#)

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Hi [REDACTED],

Thank you for your email dated 2 March 2026 requesting comment under Sections 73(2)&(4) of the Hydrogen and Renewable Energy Act 2023 (the Act) in relation to a proposal by Plains Energy Project Pty Ltd (part of Shift Energy group) for a Battery Storage Energy System (BESS) (1x250MW/25000MWh and 3 x 250MW/1000MWh) and a project substation located at 1844 Plains Road, Rocky Plains and an application for an Associated Infrastructure Licence (AIL).

The proponent also requested that the project is designated to enable a possible future upgrade of ElectraNet’s existing transmission line and associated substation (which are not part of this application).

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 Rural Zone of the Planning and Design Code (the Code) which anticipates a range of primary production activities and renewable energy facilities. The Zone seeks to protect and maintain the productive value of rural land, with renewable energy facilities and ancillary development sited to minimise significant fragmentation or displacement of existing primary production. The project area is approximately 170ha and is located near the existing Bunday substation. The site has road frontages to Plains Road and has primary site access from Rocky Plains Road. The location of a future ElectraNet substation is also identified on the plans. The BESS equipment is expected to have an approximate operating life span of 25-30 years. At the end of the project the infrastructure will be

	decommissioned. The region surrounding the area known as “Bundey” has attracted a number of renewable energy projects. The approved facilities nearby include: • Geranium Plains Solar Farm and BESS (directly adjacent the subject site) • Genaspi Solar Farm • EPS Energy – Robertstown & Solar Bess • EPS Energy – Robertstown Solar Farm While there are several approvals in place only one has been constructed. The cumulative impacts have been considered in the EIR report. ElectraNet has been consulted with respect to their existing OTL infrastructure. Their feedback included advice with regard to setbacks from this infrastructure. ElectraNet also requested that space be provided to accommodate the duplication of the OTL and an additional substation. This has been provided in the layout but does not form part of the Licence application. It is noted that a temporary concrete batch plant and use of local water resources will not be required for this development. Water will be carted and stored on-site. The site contains two designated water courses, one along the northern boundary and one in the southern half of the site. The impact of the development on native vegetation (Level 3 clearance) will be considered under the Native Vegetation Act 1991. <i>It is recommended that 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 primary production (if desired by the landowner(s)).</i>
Planning & Design Code	The application has been accompanied with an Environmental Impact Report (EIR) which includes a planning and Land use assessment. A suite of technical studies has been provided. <u>Noise</u> The applicant recommends that the final selection of equipment includes noise control measures (e.g. engineering attenuation to the battery and inverter systems and/or restrictions of the operating capacity of the cooling systems). The recommendation is for a noise assessment to be undertaken prior to construction, which accounts for the final layout and equipment and noise control measures and any adjustment for tonality, to ensure the BESS satisfies the Policy. The final selection of equipment will have regard to the requirement to meet the Policy. Different equipment may require a different approach to noise (i.e engineering attenuation

and/or operating restrictions such as limiting nighttime noise by the reduction of cooling capacity of the system) .

The applicant advises that a final noise assessment will be prepared based on the final design and the equipment selected. This will be provided to DEM to demonstrate compliance.

[It is recommended that the final noise assessment be included as a condition of the licence, to the satisfaction of DEM.](#)

Stormwater

The applicant gave consideration to shift the facility site footprint further south to avoid the impact on the northern water course. However, this would impact the remnant stand of native vegetation. Locating the battery on the southern side of this remnant vegetation would have noise implications for the residence to the southeast of the site and increase visual impact on Rocky Plains Road. The applicant considers that on balance, if properly designed and rehabilitation is managed, the impact to the northern watercourse will have the least consequence. They advise that a suitable design solution and rehabilitation approach will be developed and they will obtain a Water Affecting Activity Permit for this action.

[It is recommended that stormwater management with final plans be included as a condition of the licence, to the satisfaction of DEM.](#)

Setbacks and Visual Impact

Performance outcome 2.1 of the 'Infrastructure and Renewable Energy Facilities' - General Development Policy sets out standards to reduce visual impact of above ground infrastructure.

The BESS infrastructure has a 400-550m setback from Rocky Plains Road. The setback to the Plains Road is 80m. The applicant acknowledges that there will be visual impact along Plains Road and portions of Rocky Plains Road.

The applicant has also acknowledged that there will be a visual impact for the neighbour to the west (as they are on elevated ground with sweeping views of the site). There is limited potential to address the visual impacts for this neighbour within the BESS site boundary. Landscape screening along the eastern boundary of the subject site will not provide effective screening for the dwelling. In addition, given the local soil and climatic conditions it will be challenging to establish effective landscape screening. Some strategically placed vegetation located closer to the dwelling may assist with screening without removing longer distance views, although the resident of this dwelling has not agreed to this approach. The applicant advises they will further investigate the visual

	impact to the neighbour to the east and have discussions with the affected landowner. It is noted to the south-west the site is screened by a low ridgeline which includes a patch of remnant vegetation. The development will be viewed from Rocky Plains Road. The applicant advises that landscape screening options will be considered, particularly at the eastern end of the site and where roadside screening is ineffective. It is recommended that the applicant consult further with affected neighbours and endeavour to provide levels of screening which minimises visual impact – or find an alternative solution to satisfy their concerns. It is recommended that final landscape / screening plans be provided to the satisfaction of DEM and that this is included as a condition of the licence. Bushfire Risk The applicant advises that the proposal is unlikely to exacerbate the potential for natural hazards such as flooding and bushfire. However, the development will need to be designed to appropriate standards to ensure that it is protect from such hazards. BESS operators should engage with the CFS when designing, installing and operating BESS facilities to ensure that CFS response processes are not compromised.
Regional Plans	The subject site is within the Yorke Peninsula and Mid North regional planning area. The Plan notes that the region has been identified as an area of high suitability to produce solar and wind powered renewable energy generation. The subject site is adjacent (and possibly intersecting) the ElectraNet Transmission Asset Corridor Investigation Area. See snip below: 
State Planning	The proposal directly relates to State Planning Policy 12 (Energy) which seeks the facilitation of renewable energy facilities where the impact on

Policies	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 <i>Native Vegetation Act 1991</i> and <i>EPBC Act 1999</i>. The applicant acknowledges that the planning system identifies the need for renewable energy facilities and designates the Rural Zone as the preferred location for such facilities subject to addressing impact issues. The policy also highlights a range of potential impact issues and mitigation solutions. They acknowledge that there will be some level of visual impact but that this should be minimised where practical and possible.
Previous decisions	The subject land is located near a number of approved renewable energy facilities. Directly north of the subject site is an approved development site for a renewable energy facility including 250MW solar farm, 150MW/300MWh battery storage and substation at Geranium Plains (DA 422/V010/21). This approval is valid with a commencement date of 19 July 2028 and completion date of 19 July 2030. Image below shows the location of this approved site.  The EIR has considered the cumulative visual impacts of this development when considered alongside other existing or planned developments in the area.
Other matters	N/A

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

Kind Regards

[Redacted Signature]

Team Leader, Crown Development
State Assessment
Planning and Land Use Services

Department for Housing and Urban Development



Level 10, 83 Pirie Street, Adelaide SA 5000

Telephone 1800 752 664

<http://www.plan.sa.gov.au>

If you are visiting our office please phone or email ahead to make sure security access arrangements.



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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Native Vegetation Council

81-95 Waymouth Street
Adelaide SA 5000

GPO Box 1047
Adelaide SA 5001

Ph| 08 8303 9777

Contact: [REDACTED] Policy Officer
Telephone: [REDACTED]

13 April 2026

nvc@sa.gov.au

[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 provide comments on Plains Energy Project Pty Ltd's (the proponent) proposed application under the *Hydrogen and Renewable Energy Act 2023* (HRE Act) for an Associated Infrastructure Licence (AIL) to develop the Plains Battery Energy Storage System (BESS) project.

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.

I note that:

- The proponent (a subsidiary of Enduring Group Pty Ltd) is proposing to contribute to South Australia's renewable energy targets by developing four stages of BESS to facilitate 1000 megawatts (MW) / 5000 megawatt-hours (MWh) of energy storage. The Proponent will also construct an associated project substation and ancillary infrastructure.
- The project site is located near Rocky Plains, which is situated approximately 134 km north east of Adelaide, South Australia. The proposed project is wholly contained within a single property, comprising an area of approximately 215 hectares.

- The project site is situated within the Murray Mallee IBRA Subregion, approximately 5% of which is currently mapped as remnant native vegetation, increasing the importance of vegetation preservation. Of this remnant vegetation, only 26% is formally protected.
- The project area is currently designated as a Rural Zone, with a long history of disturbance associated with livestock and dry land cropping. There are patches of native vegetation remaining on site, situated within road reserves and/or areas of high elevation.
- An Accredited Native Vegetation Consultant conducted an initial environmental survey of the site, using both the Scattered Tree Assessment Method (STAM) and Bushland Assessment Method (BAM) to assess remnant vegetation. The site's remnant vegetation was classified as low quality, largely consisting of native chenopod regeneration, colonising species, and scattered paddock trees. Roadside vegetation was considered to have higher biological diversity than that contained within the site itself, though it was also considered to be lower quality. During this survey, three vegetation associations were assessed and mapped:
 - o *Senna artemisioides* spp. shrubland
 - o *Maireana* spp. shrubland
 - o *Eucalyptus oleosa* +/- *Eucalyptus phenax* Mallee over *Maireana* spp.
- No threatened flora species, fauna species, or Threatened Ecological Communities were identified during the initial environmental survey. However, the EIR also notes that Spiller's wattle (*Acacia spilleriana*) has been recorded within the search area within the previous 20 years. Spiller's wattle is classified as Endangered at both the National and State level.
- Multiple pest species were identified amongst the site's remnant vegetation. Noted species include one African boxthorn (*Lycium ferocissimum*) plant, which is considered a Weed of National Significance.
- Some of the site's roadside vegetation will be impacted by the current project design. However, the proponent intends to avoid the clearance of a distinct area of remnant native vegetation. The EIR also notes intent to minimise the impact footprint and establish a formal Rehabilitation Plan to guide progressive and effective rehabilitation efforts.
- When discussing native vegetation, the EIR notes the proponent's intent to seek clearance approval under the NV Act. However, as the final clearance footprint has not been finalised, an application to clear native vegetation is yet to be lodged. The EIR also reflects the legislated requirement for an appropriate Significant Environmental Benefit (SEB) to offset clearance, while noting intent to offset any clearance via payment into the Native Vegetation Fund.
- Further detail regarding environmental rehabilitation, management and assessment details will be contained within the future draft Construction Environmental Management Plan (CEMP) and Operations Management Plan (OMP).

I provide the following comments:

- The Native Vegetation Clearance Data Report has not yet been provided to the Council. While the Council appreciates the opportunity to provide comment on the draft EIR and SEO, the inclusion of a Data Report would provide the Council with the

additional information required to provide informed and appropriate commentary and direction. Please note that the Data Report must also detail how the mitigation hierarchy was applied.

- The EIR refers to a preliminary ecological impact assessment investigation and both the STAM and BAM scoresheets (see section 3.4, table 13). The Council will require a copy of each scoresheet to assess the adequacy of SEB calculations. A copy of these spreadsheets must also be included with future applications for native vegetation clearance. Furthermore, assessment must be completed with a current version of the scoresheet (dated 9 September 2025).
- The Proponent will provide a SEB to offset any proposed clearance, noting their preference to offset any clearance via payment into the Native Vegetation Fund. The Council will require the proponent to demonstrate a reasonable attempt to provide an on-ground offset before accepting payment into the Native Vegetation Fund.
- Where possible, project design should avoid and/or minimise the clearance of vegetation situated on land comprising a road reserve. Native vegetation in these identified areas can have significant ecological value, often containing threatened plant species and vegetation communities that may provide habitat for native wildlife. To this end, the Council identifies an opportunity for the proponent to incorporate buffer zones for identified road reserves. The inclusion of buffer zones ensures ongoing protection and provides space for potential growth.
- The EIR provides insufficient information to assess whether the proposed clearance is at variance with Principles of native vegetation clearance, as outlined in Schedule 1 of the NV Act. This includes, but is not limited to, any native vegetation that is significant as a remnant in an area which has been extensively cleared.

Under the NV Act, the Council must not make a decision that is seriously at variance with those principles.

- The Council encourages recognition of the indirect impact that other events may have on native vegetation and/or biodiversity as potential receptors. These include:
 - o Direct interference with water courses and potential for disruption of flow and reduced water quality (impact ID #WC1).
 - o Contaminated and/or excessive runoff entering a water course, resulting in reduced water quality and/or erosion (impact ID #WC2).
 - o Any increase in accidents on local roads that involve other vehicles or fauna (impact ID #T1).
 - o The generation of excessive dust, which may cause unreasonable nuisance to neighbours (impact ID #AQ1).
 - o The poor materials and waste management (impact ID #MW1).

Further, the Council notes the potential for the loss of native vegetation to impact other receptors, such as biodiversity, fauna, soil composition, the water course, and air quality.

- The Council encourages greater specificity regarding the proponent's approach to weed management, particularly with regard to the declared weed, African boxthorn

(*Lycium ferocissimum*). Further detail regarding appropriate management measures can be found on the Department of Primary Industries and Regions¹ website.

- The Council supports the proponent's proposal to use native species for visual screening, as proposed in the Leading Performance Criteria for impact ID#VI1. Prioritising native vegetation in future revegetation works maximises biodiversity outcomes and contributes to mitigating the impacts of climate change. It also provides other benefits, such as habitat and food for common and threatened species, tourism opportunities, improved water quality, and enhanced wellbeing for all.
- When detailing the assessment criteria for SEO ID #NV1 & 2, the Council encourages the Proponent to include:
 - o Any excavation or fill material surplus to the requirements of the development must be disposed of such that it will not adversely impact on native vegetation, contribute to erosion or sedimentation, or facilitate the spread of pest plant and pathogenic material.
 - o Any rehabilitation works to be conducted in accordance with applicable State and Commonwealth legislation.

Thank you again for the opportunity to provide comments at this early stage. 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

¹ See: [African boxthorn - PIRSA](#), accessed 20 March 2026.

From: [DEM:OTR Electricity Infrastructure](#)
To: [REDACTED]
Subject: RE: HRE Act referral - Request for comment: Plains BESS
Date: Monday, 2 March 2026 3:47:08 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.gif](#)

OFFICIAL

Hi [REDACTED]

This proposal appears consistent with the certificate issued by the OTR.

Regards

[REDACTED]
Jurisdictional System Security Engineer

Department for Energy and Mining
[REDACTED]

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Date:	13/04/2026
Our reference:	20260413-01jp
Your reference:	NA

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

Application	Associated Infrastructure Licence (AIL) (Energy Infrastructure Facility)
Nature of Development	Development to comprise of four stages of BESS, including associated infrastructure and a project substation with proposed capacities as follows: 1x 250MW/2000MWh and 3 x 250MW/1000MWh.
Development/Property Name	Plains Battery Energy Storage System (BESS)
Location	1844 Plains Road, Rocky Plain – approximately 6km from Robertstown
Owner	Plains Energy Project Pty Ltd
Applicant	Shift Energy

LEGISLATIVE FRAMEWORK

Instrument	<i>Hydrogen and Renewable Energy Act 2023 (HRE Act) and Hydrogen and Renewable Energy Regulations 2024 (HRE Regulations)</i>
Overlay	Hazards (Bushfire – Regional) Overlay
Fire Authority/ Response Area	South Australian Country Fire Service/ Robertstown 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:

- Plains BESS Project Statement of Environmental Objectives dated 21/01/2026
- Plains BESS Project Environmental Impact Report dated 21/01/2026

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 Robertstown 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 recommends all buildings and infrastructure such as Substation, Inverter stations, BESS and Control Buildings or other similar assets, should be located no less than 17 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.

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 17 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-fighting equipment at each site, including fire extinguishers, knapsacks, and other equipment suitable for initial response actions.

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

MANIFEST BOX (or similar)

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

BUILDING CONSIDERATIONS and BESS:

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

Additional notes for Energy facilities or BESS:

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

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

Prepared By: Manager DAS	Signature: 	Date: 13/04/2026
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REF:3.36.1.1

8 April 2026

[REDACTED]
Senior Environmental Compliance Officer
Department for Energy and Mining
Via Email: DEM.EnergyRegulation@sa.gov.au

Dear [REDACTED],

Re: Plains Battery Energy Storage System (BESS)

The Regional Council of Goyder (Council) has examined the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) in relation to the Plains Battery Energy Storage System (Plains BESS).

Council understands that Plains Energy Project Pty Ltd (a subsidiary of Enduring Group Pty Ltd) has made an application pursuant to the *Hydrogen and Renewable Energy Act 2023* (HRE Act) for an Associated Infrastructure Licence (AIL) to undertake the construction and operation of the Plains BESS. The BESS is proposed to facilitate 1000 megawatts (MW) / 5000 megawatt-hours (MWh) of energy storage.

The Plains BESS is proposed at 1844 Plains Road, Rocky Plains, approximately 6km from Robertstown and within the Regional Council of Goyder Local Government Area.

Council appreciates that the applicant has considered and incorporated numerous comments made on the project as part of the community engagement phase of the project. Council's comments are generally reflected in the EIR.

Council has no objection to the proposed Plains BESS development as it is appropriately located within the Rural Zone and a locality that contains existing and approved energy infrastructure. Furthermore, the locality does not contain a large number of sensitive receivers.

Following a review of the EIR and SEO (dated February 2026), Council provides comments on three areas of interest, namely traffic management during construction, the community benefit scheme and workers accommodation.

Traffic

Council acknowledges that the EIR and SEO incorporate the preparation of a Traffic Management Plan (TMP) in consultation with the Department for Infrastructure and Transport (DIT) and the Regional Council of Goyder. The preparation of the TMP is supported, however Council would seek to ensure that TMP adequately reflects that any/all necessary road upgrades to the local road network during construction be undertaken at the cost of the developer.

Currently the EIR and SEO are written in such a manner that there would be a dilapidation survey of the local road network and then works undertaken to repair any damage post construction. This approach is not acceptable to Council, and it is necessary for the TMP to identify works required as part of the final design phase and to be undertaken prior to construction commencing. Any such work would need an infrastructure agreement with Council. The TMP should include:

- *An agreement with the Regional Council of Goyder that all necessary road upgrading (including drainage and water run-off measures), junction/intersection treatments and maintenance costs (for the duration of the construction phase) are to be borne by the developer.*
- *Any necessary road works on the local or arterial road network (outlined in sub clause above) shall be designed and constructed to relevant standards (i.e. Austroads Guidelines and Australian Standards) to the satisfaction of the road authority, with all associated costs to be borne by the developer.*
- *Any road works on the local or arterial road network required to provide safe access to the development or is identified by the TMP shall be designed and constructed in accordance with Austroads Guidelines and Australian Standards and to the satisfaction of the relevant road authority, with all associated costs to be borne by the applicant.*

Community Benefit Scheme

Council supports the development of a Community Benefit Sharing Program, which will benefit the Regional Council of Goyder community. Council would like the opportunity to discuss this fund with you further, particularly the proposed contribution and opportunities for project-based activities.

The EIR references a contribution of \$40,000 per stage per annum. Whilst this amount is generous, Council considers that is lower than industry best practice and respectfully requests that it be reviewed. It is Council's understanding that current community funds are more inline with \$150 per megawatt hour per annum.

It is requested that the SEO further confirms that the Community Benefit scheme be operational at the commencement of construction, for the life of the project and with annual indexation. The SEO should also reference the annual contribution amount and indexation.



Workers Accommodation

Discussions in the EIR regarding the potential impact of workers accommodation on local accommodation (permanent and short-term) are noted and well appreciated by Council.

The EIR indicates that during peak activity the workforce may reach 150 employees. It is also noted that the project timeframe indicates construction to commence in or about the first quarter of 2028 and extend for approximately 18 months. This construction timeframe will coincide with other renewable energy projects within the Council area and broader region. Consequently, Council supports the development of a Workforce Accommodation Strategy as contained in the EIR and SEO. Council would encourage further liaison regarding the preparation of this plan at the earliest opportunity.

Thank you for the opportunity to provide comment and we would be pleased to discuss these matters at a mutually convenient time.

Yours sincerely

CHIEF EXECUTIVE OFFICER



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

13/13/04/2026	Zeljka Danilovic	Native Vegetation Council (NVC)	Government Referral (s.73 HRE Act)	Indirect Impacts on Native Vegetation & Biodiversity	The Council encourages recognition of the indirect impact that other events may have on native vegetation and/or biodiversity as potential receptors. These events include: • Direct interference with water courses and potential for disruption of flow and reduced water quality and impact (ID #WVC1). • Contaminated and/or excessive runoff entering a water course, resulting in reduced water quality and erosion (Impact ID #WVC2). • Any increase in accidents on local roads that involve other vehicles or fauna (Impact ID #T1). • The generation of excessive dust, which may cause unreasonable nuisance to neighbours (Impact ID #D2). • The poor materials and waste management (Impact ID #MW1). Further, the Council notes the potential for the loss of native vegetation to impact other receptors, such as biodiversity, fauna, soil composition, the water course, and air quality. The Council encourages greater specificity regarding the weed management, particularly with regard to the declared weed, African boxthorn (<i>Lycium ferocissimum</i>). Further detail regarding appropriate management measures can be found on the Department of Primary Industries and Regions website.	The Council encourages recognition of indirect impacts on native vegetation and biodiversity, including interference with water courses and water quality (WVC1), contamination/excessive runoff (WVC2), increased accidents involving fauna on local roads (T1), excessive dust nuisance (AQ1), and poor materials/waste management (MW1).	Noted and accepted. The EIR already assesses each of the nominated indirect impact pathways through specific impact elements: WVC1 (Tables 27 – Water Courses), WVC2 (Table 28 – Water Quality/Runoff), T1 (Table 31 – Traffic/Fauna), AQ1 (Table 34 – Air Quality/Dust), and MW1 (Table 35 – Materials and Waste). Each table includes a confirmed SPR connection assessment and a Proposed Management Approach. The CEMP/OMP and CEMP will explicitly cross-reference the plan and Fauna Management Plan to these indirect pathways, ensuring biodiversity protection is integrated across all management plans. The NVC's recognition of these linkages will be acknowledged in the next revision of the SEO.	No	
14/13/04/2026	Zeljka Danilovic	Native Vegetation Council (NVC)	Government Referral (s.73 HRE Act)	Weed Management – African Boxthorn		The Council encourages greater specificity regarding the proponent's approach to weed management, particularly in relation to the declared weed African boxthorn (<i>Lycium ferocissimum</i>), which is a Weed of National Significance identified on site.	Noted and accepted. The Weed, Pathogen and Pest Control Management Plan within the CEMP/OMP (Impact ID: WPP1, Table 33) addresses this matter including a biosecurity risk assessment as part of CEMP/OMP preparation and a communication protocols with adjacent landowners to facilitate coordinated weed management. A specific reference to African boxthorn (<i>Lycium ferocissimum</i>) as a Weed of National Significance has been included.	Yes	Table 11 WPP1: updated to specifically reference African boxthorn (<i>Lycium ferocissimum</i>) as a Weed of National Significance
15/13/04/2026	Zeljka Danilovic	Native Vegetation Council (NVC)	Government Referral (s.73 HRE Act)	Native Species for Visual Screening (Supportive)	The Council supports the proponent's proposal to use native species for visual screening, as proposed in the Leading Performance Criteria for Impact (DPM1). Prioritising native vegetation in future revegetation works maximises biodiversity outcomes and contributes to mitigating the impacts of climate change. It also provides other benefits, such as habitat and food for common and threatened species, tourism opportunities, improved water quality, and enhanced wellbeing for all.	The Council supports the proponent's proposal to use native species for visual screening/Leading Performance Criteria, Impact ID #V11. Prioritising native vegetation in revegetation works maximises biodiversity outcomes and contributes to climate change mitigation.	Noted	No	
16/13/04/2026	Zeljka Danilovic	Native Vegetation Council (NVC)	Government Referral (s.73 HRE Act)	SEO ID N1Y & N2 – Additional Assessment Criteria	When detailing the assessment criteria for SEO ID N1Y & 2, the Council encourages the Proponent to include: • Any excavation or fill material surplus to the requirements of the development must be disposed of such that it will not adversely impact on native vegetation, contribute to erosion or sedimentation, or facilitate the spread of pest plant and pathogenic material. • Any revegetation works to be conducted in accordance with applicable State and Commonwealth legislation.	The Council encourages the proponent to include additional criteria in the SEO ID (1) native vegetation, contribute to erosion/sedimentation, or facilitate spread of pest plant and pathogenic material; (2) Rehabilitation works to be conducted in accordance with applicable State and Commonwealth legislation.	Noted and accepted. This impact issue was identified under the topic of "Landform" which includes both matters raised by the NVC. The Landform table has been updated to more specifically reference the Native Vegetation Act, the comment made by NVC and the two matters raised have been included in the Proposed Control/Management Approach.	Yes	Table 1 L1Y: amended to include Native Vegetation Act, NVC comment
17/08/04/2026	David J. Stevenson	Regional Council of Goyder	Government Referral (s.73 HRE Act)	Traffic Management Plan – Road Upgrades	Council acknowledges that the ER and SEO incorporate the preparation of a Traffic Management Plan (TMP) in consultation with the Department for Infrastructure and Transport (DTI) and the Regional Council of Goyder. The preparation of the TMP is supported. However Council would seek to ensure that TMP adequately reflects that any/all necessary road upgrades to local roads during construction undertaken at the cost of the developer. Currently the ER and SEO are written in such a manner that there would be a duplication survey of the local road network and then works undertaken to repair any damage road construction. This approach is not acceptable to Council, and it is necessary for the TMP to identify works required as part of the final design phase and to be undertaken prior to commencing. Any such work would need an infrastructure agreement with Council. The TMP should include: • An agreement with the Regional Council of Goyder that all necessary road-upgrading (including drainage and water run-off measures), junction/intersection treatments and maintenance works (only for the duration of the construction phase) are to be borne by the developer. • Any necessary road works on the local or arterial road network shall be designed and constructed to relevant standards (i.e. Austroads Guidelines and Australian Standards) to the satisfaction of the road authority, with all associated costs to be borne by the developer. • Any road works on the local or arterial road network required to provide safe access to the development or as identified by the TMP shall be designed and constructed in accordance with Austroads Guidelines and Australian Standards and to the satisfaction of the relevant road authority, with all associated costs to be borne by the applicant.	Council supports preparation of a Traffic Management Plan (TMP) but opposes the current approach of a post-construction disruption survey and report. Council requires the TMP to identify all necessary road upgrades prior to construction commencing, with all costs borne by the developer. An infrastructure agreement with Council is required. Road works must comply with Austroads Guidelines and Australian Standards.	Noted and accepted. The impact issue was identified under the topic of "Landform" which includes both matters raised by the NVC. The Landform table has been updated to more specifically reference the Native Vegetation Act, the comment made by NVC and the two matters raised have been included in the Proposed Control/Management Approach.	Yes	Table 1 L1Y: amended to include Native Vegetation Act, NVC comment
18/08/04/2026	David J. Stevenson	Regional Council of Goyder	Government Referral (s.73 HRE Act)	Community Benefit Scheme – Contribution Level	Council supports the development of a Community Benefit Sharing Program, which will benefit the Regional Council of Goyder community. Council would like the opportunity to discuss this first with you further, particularly the proposed contribution and opportunities for project-based activities. The EIR references a contribution of \$40,000 per stage per annum. Whilst this amount is generous, Council considers that is lower than industry best practice and respectfully requests that it be reviewed. It is Council's understanding that current community funds are more in line with \$150 per stage per annum. It is requested that the SEO further confirm that the Community Benefit scheme be operational at the commencement of construction, for the life of the project and with annual indexation. The SEO should also reference the annual contribution amount and indexation.	Council supports the Community Benefit Sharing Program but considers the proposed \$40,000 per stage per annum to be below industry best practice (current benchmark is approximately \$150,000 per annum). Requests the contribution be reviewed and increased. The SEO should confirm the scheme is operational from commencement of construction, for the life of the project, with annual indexation.	Noted. The proponent is committed to a Community Benefit Scheme as documented in the SEO (Impact ID: C1) and EIR Table 45. The proponent respectfully disputes Council's characterisation of the \$40,000/stage/annum contribution as below industry benchmark. The cited benchmark of \$150,000 is understood to be \$150,000 per annum, which for this project equates to an average of approximately \$37,500 per annum – less than the proponent's current offering. The proponent also notes that this project carries significant financial constraints not shared by comparable projects connecting to the Robertson substation. Unlike those projects, the proposed is required to build and control a dedicated route substation (in addition to the normal project sub-station) to facilitate grid connection, which represents a substantial capital imposition and limits the financial returns available to support community contributions. Having regard to these factors, the proponent considers the proposed contribution of \$40,000/stage/annum to be fair and reasonable in the context of this project, and does not propose to increase this offering.	No	
19/08/04/2026	David J. Stevenson	Regional Council of Goyder	Government Referral (s.73 HRE Act)	Workers Accommodation Strategy	Discussions in the EIR regarding the potential impact of workers accommodation on local accommodation (employment and short-term use) are well represented by Council. The EIR indicates that during peak activity the workforce may reach 150 employees. It is also noted that the project timeframe indicates construction to commence in or about the first quarter of 2028 and extend for approximately 18 months. This construction timeframe will coincide with other renewable energy projects within the Council area and broader region. Consequently, Council supports the development of a Workforce Accommodation Strategy as contained in the ER and SEO. Council would encourage further liaison regarding the preparation of this plan at the earliest opportunity.	Council notes that peak workforce may reach 150 employees during construction (ID: C23). It is noted that this coincides with other regional renewable energy projects in the region. Council supports development of a Workforce Accommodation Strategy as referenced in the ER and SEO, and encourages further liaison at the earliest opportunity.	Noted and accepted. The proponent acknowledges the potential for peak workforce (ID: C23) – i.e. maximum staff to coincide with other regional renewable energy projects, subject to all projects proceeding on schedule. The SEO Table addressing Accommodation (Impact ID: C23) has been updated to include the Council comments and a requirement to liaise with Council regarding the timing of other projects.	Yes	Table 19 C23: amended to include Stakeholder view and additional Control/Management Approach that includes liaison with Council.
20/02/03/2026	Mark Burns	Dept. for Energy and Mining – OTR Electricity Infrastructure	Government Referral (s.73 HRE Act)	System Security / OTR Certificate	This proposal appears consistent with the certificate issued by the OTR.	The proposal appears consistent with the certificate issued by the OTR. No further concerns raised.	Noted	No	
21/13/04/2026	Gabrielle McMahon	Dept. for Housing and Urban Development (DH4D)	Government Referral (s.73 HRE Act)	Decommissioning Conditions	The subject site is located within the Rural Zone of the Planning and Design Code (the Code) which anticipates a range of primary production activities and renewable energy facilities. The zone seeks to protect and maintain the production of rural land, with an aim to encourage rural and secondary development suited to minimise significant fragmentation or displacement of existing primary production. The project area is approximately 170ha and is located near the existing Brundley substation. The site has frontage to Plains Road and has primary site access from Rocky Plains Road. The location of a future Electrohub substation is also identified on the plans. The EIES equipment is expected to have an approximate operating life span of 25-30 years. At the end of the project the infrastructure will be decommissioned. The region surrounding the area known as "Brundley" has attracted a number of renewable energy projects. The approved facilities nearby include: • Generation Plains Solar Farm and BESS (directly adjacent the subject site) • Genasol Solar Farm • EPS Energy – Robertson & Solar Bliss • EPS Energy – Robertson Solar Farm While there are several approvals in place only one has been constructed. The cumulative impacts have been considered in the EIR report. Electrohub has been consulted with respect to their existing OTL infrastructure. Their feedback included advice with regard to setbacks from this infrastructure. Electrohub also requested that space be provided to accommodate the duplication of the OTL and an additional substation. This has been provided in the layout but does not form part of the Licence application. It is noted that a temporary concrete batch plant and use of local water resources will not be required for this development. Water will be carted and stored on-site. The site contains two designated water courses, one along the northern boundary and one in the southern half of the site.	The subject site is located within the Rural Zone of the Planning and Design Code (the Code) which anticipates a range of primary production activities and renewable energy facilities. The zone seeks to protect and maintain the production of rural land, with an aim to encourage rural and secondary development suited to minimise significant fragmentation or displacement of existing primary production. The project area is approximately 170ha and is located near the existing Brundley substation. The site has frontage to Plains Road and has primary site access from Rocky Plains Road. The location of a future Electrohub substation is also identified on the plans. The EIES equipment is expected to have an approximate operating life span of 25-30 years. At the end of the project the infrastructure will be decommissioned. The region surrounding the area known as "Brundley" has attracted a number of renewable energy projects. The approved facilities nearby include: • Generation Plains Solar Farm and BESS (directly adjacent the subject site) • Genasol Solar Farm • EPS Energy – Robertson & Solar Bliss • EPS Energy – Robertson Solar Farm While there are several approvals in place only one has been constructed. The cumulative impacts have been considered in the EIR report. Electrohub has been consulted with respect to their existing OTL infrastructure. Their feedback included advice with regard to setbacks from this infrastructure. Electrohub also requested that space be provided to accommodate the duplication of the OTL and an additional substation. This has been provided in the layout but does not form part of the Licence application. It is noted that a temporary concrete batch plant and use of local water resources will not be required for this development. Water will be carted and stored on-site. The site contains two designated water courses, one along the northern boundary and one in the southern half of the site.	Noted. The HRE system already includes the requirement for a Decommissioning Plan and, as a Regulated environment, a "condition" in the sense of the planning system is not necessary. Furthermore, the SEO identifies the need for a Decommissioning Plan in Section 2.2 and the SEO Objective tables identify which impact issues need to be included in this Plan, along with any industry requirements and standards that evolve over time. An additional paragraph has been added to Section 2.2 of the SEO to further emphasise this aspect.	No	Section 2.2 - 67 paragraph added to recognise Decommissioning Plan
21A								Yes	
22/13/04/2026	Gabrielle McMahon	Dept. for Housing and Urban Development (DH4D)	Government Referral (s.73 HRE Act)	Noise – Final Noise Assessment	The application has been accompanied with an Environmental Impact Report (EIR) which includes a planning and Land use studies and a final noise assessment. A suite of technical studies has been provided. The applicant recommends that the final selection of equipment includes noise control measures (e.g. engineering attenuation to the battery and inverter systems and/or restrictions of the operating capacity of the cooling systems). The recommendation is for a noise assessment to be undertaken prior to construction, which accounts for the final layout and equipment and noise control measures and any adjustment for tonality, to ensure the BESS satisfies the Policy. The final selection of equipment will have regard to the equipment to meet the Policy. Different equipment may require a different approach to noise (i.e. engineering attenuation and/or operating restrictions such as limiting nighttime noise to the reduction of cooling capacity of the system). The applicant advises that a final noise assessment will be prepared based on the final design and the equipment selected. This will be provided to DEM to demonstrate compliance. It is recommended that the final noise assessment be included as a condition of the licence, to the satisfaction of DEM.	The applicant has committed to a final noise assessment based on final design and equipment selected. DEM recommends the final noise assessment (including for final layout, equipment and noise control measures including tonality) be included as a condition of the licence, to the satisfaction of DEM.	Noted. As indicated above, the need for a "condition" is questioned. The SEO N2 Table specifies planning and Land use studies and a final noise assessment. The requirement to undertake a final noise assessment and submit this to DEM prior to commencement of construction.	No	
23/13/04/2026	Gabrielle McMahon	Dept. for Housing and Urban Development (DH4D)	Government Referral (s.73 HRE Act)	Stormwater Management	The applicant gave consideration to shift the facility site footprint further south to avoid the impact on the northern water course. However, this would impact the remnant stand of native vegetation. Locating the battery on the southern side of the remnant vegetation would require modifications for the residence to the southwest of the site and increase visual impact on Rocky Plains Road. The applicant considers that no balance. If properly designed and installed the impact to the northern watercourse will have the least consequences. They advise that a suitable design solution and rehabilitation approach will be developed and they will obtain a Water Affecting Activity Permit for this action. It is recommended that stormwater management with final plans be included as a condition of the licence, to the satisfaction of DEM.	Noted that the northern watercourse will be affected and the applicant will obtain a Water Affecting Activity Permit. Recommends that stormwater management with final plans be included as a condition of the licence, to the satisfaction of DEM.	Noted. The need for a "condition" is questioned and it is noted that stormwater matters rest with Council rather than DEM. The proponent confirms the requirement to obtain a Water Affecting Activity Permit is specified in the SEO WVC1. SEO Table WVC2 address site stormwater management and specified the need for a stormwater management system to be designed and agreed. However, it is acknowledged that the design should be agreed with Council as the authority responsible for stormwater management and the wording of this council be improved.	Yes	Table 6 WVC2: amended to clarify the role of Council regarding the stormwater management system

24/13/04/2026	Gabrielle McIlhann	Dept. for Housing and Urban Development (DHUD)	Government Referral (s 73 HRE Act)	Visual Impact & Landscape Screening	Performance outcome 2.1 of the Infrastructure and Renewable Energy Facilities – General Development Policy sets out standards to reduce visual impact of above ground infrastructure. The BESS infrastructure has a 400-550m setback from Rocky Plains Road. The setback to the Plains Road is 80m. The applicant acknowledges that there will be visual impact along Plains Road and portions of Rocky Plains Road. The applicant has also acknowledged that there will be a visual impact for the neighbour to the west (as they are on elevated ground with sweeping views of the site). There is limited potential to address the visual impacts to this neighbour within the BESS site boundary. Landscape screening along the eastern boundary of the subject site will not provide effective screening for the dwelling. In addition, given the local soil and climatic conditions it will be challenging to establish effective landscape screening. Some strategically placed vegetation located closer to the dwelling may assist with screening without needing longer distance views, although the resident of this dwelling has not agreed to this approach. The applicant advises they will further investigate the visual impact to the neighbour to the east and have discussions with the affected landowner. It is noted to the south-west the site is screened by a low vegetation which includes a path of remnant vegetation. The development will be viewed from Rocky Plains Road. The applicant advises that landscape screening options will be considered, particularly at the eastern end of the site and where roadside screening is ineffective. It is recommended that the applicant consult further with affected neighbours and endeavour to provide levels of screening which minimises visual impact – or find an alternative solution to satisfy their concerns. It is recommended that final landscape screening plans be provided to the satisfaction of DEM and that this is included as a condition of the licence.	Acknowledges visual impact along Plains Road and Rocky Plains Road. Notes visual impact on the neighbour to the west (elevated ground with sweeping views) is difficult to fully address within the site boundary. Recommends the applicant consult further with affected neighbours and provide final landscape screening plans as a condition of the licence to the satisfaction of DEM.	Noted. The proponent acknowledges the visual impact identified by the visual assessment (EPC Group, September 2025, EIR Impact ID: V11, Table 58). The proponent has consulted directly with the occupant of the dwelling to the west, who has confirmed they do not wish to have a landscape screen established on their property. The SEO also states the need for on-going consultation. The SEO sets out that the proponent will consider landscape screening options along the road through where effective and viable, and a final landscape and native revegetation plan will be prepared once detailed design and final pad levels are available. However, it is acknowledged that the visual impact evaluation and response should be undertaken in consultation with DEM and Council and submitted to DEM for agreement.	Yes	Table 14 V11 Leading Performance Criteria and Assessment Criteria have been amended to include consultation with Council and DEM on visual impact and the preparation of the plan to the satisfaction of DEM.
25/13/04/2026	Gabrielle McIlhann	Dept. for Housing and Urban Development (DHUD)	Government Referral (s 73 HRE Act)	Buflife Risk	The applicant advises that the proposal is unlikely to exacerbate the potential for natural hazards such as flooding and bushfire. However, the development will need to be designed to appropriate standards to ensure that it is protected from such hazards. BESS operators should engage with the CFS when designing, installing and operating BESS facilities to ensure that CFS response processes are not compromised.	Notes the development must be designed to appropriate standards to ensure protection from bushfire hazard. Recommends BESS operators engage with the CFS when designing, installing and operating facilities to ensure CFS response processes are not compromised.	Noted and accepted. The proponent confirms that bushfire risk is assessed in the EIR (Impact ID: FR1, Table 39) and that the BESS will be designed, installed and operated to appropriate standards to address bushfire hazard. The proponent has received detailed requirements from SACFS (Items 26-32) which will be incorporated into the detailed design and the Fire and Emergency Management Plan with the S90MPP. A hazard study will be undertaken prior to construction to inform final design, including SA CFS Bushfire planning for Energy Infrastructure design requirements. The proponent commits to ongoing engagement with SACFS Regional Office throughout design, construction and operation. Emergency response plans will be designed to ensure first responder safety is not compromised.	No	
25A/13/04/2026	Gabrielle McIlhann	Dept. for Housing and Urban Development (DHUD)	Government Referral (s 73 HRE Act)	Additional background information	The subject site is within the Yorke Peninsula and Mid North regional planning area. The Plan notes that the region has been identified as an area of high suitability to produce solar and wind powered renewable energy generation. The subject site is adjacent (and possibly intersecting) the ElectraNet Transmission Asset Corridor Investigation Area. 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 its 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. The applicant acknowledges that the planning system identifies the need for renewable energy facilities and designates the Rural Zone as the preferred location for such facilities subject to addressing impact issues. The policy also highlights a range of potential impact issues and mitigation solutions. They acknowledge that there will be some level of visual impact but that this should be minimised where practical and possible. The subject land is located near a number of approved renewable energy facilities. Directly north of the subject site is an approved development site for a renewable energy facility including 250MW solar farm, 155MW/320MWH battery storage and substation at Geronimo Plains (EIA-CC2019/121). This approval is valid with a commencement date of 19 July 2028 and completion date of 19 July 2030. The EIR has considered the cumulative visual impacts of this development when considered alongside other existing or planned developments in the area for the Yorke Peninsula and Mid North regional planning area. The Plan notes that the region has been identified as an area of high suitability to produce solar and wind powered renewable energy generation. The subject site is adjacent (and possibly intersecting) the ElectraNet Transmission Asset Corridor Investigation Area. 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.	Background information	NA	No	
25B					Various other SPPs are relevant including SPP 4 which seeks to maintain and enhance South Australia's biodiversity and its 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. The applicant acknowledges that the planning system identifies the need for renewable energy facilities and designates the Rural Zone as the preferred location for such facilities subject to addressing impact issues. The policy also highlights a range of potential impact issues and mitigation solutions. They acknowledge that there will be some level of visual impact but that this should be minimised where practical and possible.				
26/13/04/2026	Leah Bartholomew	SA Country Fire Service (SACFS)	Government Referral (s 73 HRE Act)	Slings – Asset Protection Zone (APZ)	SACFS recommends establishing and maintaining an Asset Protection Zone (APZ) to create a buffer/buffer to any fuelled landscape in the area for the Yorke Peninsula and Mid North regional planning area. All access/egress roads on the project site. 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 17 metres from the property boundaries/lot 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 W/VWIR.	SACFS recommends establishing and maintaining an APZ to create a buffer/buffer to any fuelled landscape in the area for the Yorke Peninsula and Mid North regional planning area. All buildings and infrastructure (Substation, Inverter stations, BESS, Control Buildings) should be located no less than 17 metres from the property boundaries/lot boundary perimeter fence or existing retained vegetation, to maintain an APZ and achieve maximum exposure of no more than BAL 12.5 W/VWIR.	Noted and accepted. The proponent confirms that a hazard study will be undertaken to inform detailed layout, design and management. This would result in an Asset Protection Zone (APZ) established and maintained around all BESS infrastructure, the substation, inverter stations and control buildings. This requirement will be incorporated into the detailed layout design as a primary using constraint and into the Fire and Emergency Management Plan within the S90MPP/CEMP. The APZ will be maintained for the life of the project. The design will be reviewed by a qualified fire safety/bushfire planning professional to confirm compliance with CFS requirements.	Yes	Table 17 FR1 has been updated to specifically reference the requirement for an APZ
27/13/04/2026	Leah Bartholomew	SA Country Fire Service (SACFS)	Government Referral (s 73 HRE Act)	Access / Egress – Road Design	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. 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 safe access for the fighting or provide internal walk breaks for passive protection from spread of fire. • That include two (2) separate and safe points located on opposite ends of the road. • That be constructed with a formed, compacted, self-draining, all-weather surface. • Roads shall have a minimum formed road width of 6 metres, or if constructed less than 6 metres wide, access shall include appropriately sized passing bays or turning areas, spaced no more than 200 metres apart. • Incorporating cut-deck endings with either: a turning area with minimum surface radius of 12.5m, or 'T' or 'Y' shaped turning area with minimum formed length of 11 metres and minimum internal radii of 9.5 metres. • That be constructed with a minimum external radius of 12.5m for all road curves. • That not exceed a gradient of 16 degrees (20%). • That incorporate solid all-weather crossings over any water-course capable of supporting fire-fighting vehicles with a GVM of 21 tonnes. • Vegetation overhanging the access road shall be pruned to achieve minimum clearance of not less than 4 metres with a 4 metres height. • That 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 using Loadlock 003 type barriers in accordance with AS4429.17.	Notes current proposal does not include roads of adequate design to satisfy desired outcomes of the Hazards (Bushfire – Regional) Overlay. Requires perimeter roads 20m wide, 2 separate exit points on opposite ends, all-weather compacted surfaces, passing bays or turning areas 200m apart, cut-deck endings turning radius 12.5m, maximum gradient 16 (20%), all-weather crossings for 21 GVM vehicles, vegetation clearance 2.4m with height; loop road, Loadlock 003 padlocks on gates.	Noted and accepted. The proposed layout is conceptual only. The proponent confirms that all internal site access and perimeter roads will be designed to meet all SACFS requirements. The final layout and design, including road design will be prepared by a qualified civil engineer and submitted to SACFS Regional Office for comment and approval prior to construction. These requirements will be incorporated into the detailed civil design documentation.	Yes	Table 17 FR1 has been updated to specifically reference road design and confirm the need for liaison and approval by SACFS
28/13/04/2026	Leah Bartholomew	SA Country Fire Service (SACFS)	Government Referral (s 73 HRE Act)	Vegetation Management – APZ	Vegetation management shall be established and maintained within 17m of each Substation/Control Building/BESS or other similar assets as follows: • The vegetation management 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. • Grasses within the zone shall be reduced to a maximum height of 10cm during the fire danger season. • The APZ shall be maintained to prevent the accumulation of dead vegetation during the fire danger season. • Single row of trees and/or shrubs are permitted for screening purposes. • 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.	Vegetation management within 17m of Substation/Control Building/BESS assets understorey within APZ 50% coverage (not continuous), no understorey within 10m. 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. Grasses within the zone shall be reduced to a maximum height of 10cm during the fire danger season. The APZ shall be maintained to prevent the accumulation of dead vegetation during the fire danger season. Single row of trees and/or shrubs are permitted for screening purposes. 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.	Noted and accepted. All vegetation management requirements within and around the APZ will be incorporated into the CEMP Site Maintenance and Management Plan and the Fire and Emergency Management Plan. These maintenance and management plans will also be used to ensure the landscape and native revegetation plan to ensure screening objectives are consistent with the management requirements.	Yes	Table 17 FR1 has been updated to specifically reference vegetation management and confirm the need for liaison and approval by SACFS
29/13/04/2026	Leah Bartholomew	SA Country Fire Service (SACFS)	Government Referral (s 73 HRE Act)	Water Supply – Static Fire Water Tank	Whilst there is presence of reticulated water in the area reticulated water supply may be compromised during a bushfire event. Static fire water tanks for bushfires, BESS and buildings that 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 in Service Policy 14. 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. • Available to achieve this, their clear signage is to be provided to clearly and quickly identify the location of the fire water tanks. • Fire water tanks shall be identified with signage in accordance with AS 24 18.1. • Provision shall be made adjacent the fire water tank for a normally 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/container within 90 seconds of hose lay of the static fire water tank. If this cannot be achieved, then additional static fire water tanks at a dry hydrant system may be required.	Notes current proposal does not meet water supply requirements. Requires a static fire water tank (72,000L), minimum to SA Fire Service Policy 14 standards, including large and small-bore suction outlets, all-weather access road 20m wide, signage per AS 2418.1, level hardstand for 21 GVM vehicles 5m from outlet, and coverage of all BESS pod/container within 90m hose lay (additional tanks or dry hydrant system if not achievable).	Noted. An noted previously, the detailed design has not been undertaken. The proponent confirms that the on-site fire water supply will be designed and installed to comply with SA Fire Service Policy 14. It should be noted that this project will be required to provide a SRMPP which will also address fire risk. Once the detailed design commences, the intent is to engage further with SACFS as agree an appropriate and technically sound fire water supply management that reflects the specific characteristics of large-scale BESS technology.	Yes	Table 17 FR1 has been updated to specifically reference water supply and confirm the need for liaison and approval by SACFS

30	13/04/2026	Leah Bartholomew	SA Country Fire Service (SACFS)	Government Referral (s.73 HRE Act)	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 either in the open air. 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 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 003 call for fire service attendance. During the construction and decommissioning phases and whilst undertaking maintenance, proponents should provide the provision of basic fire-fighting equipment on each site, including fire extinguishers, respirators, 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.	The Bushfire Management Plan and Emergency Management Plan to be established and reviewed and updated annually, revised versions forwarded to relevant SACFS Regional Office. First responder safety is a priority – emergency response plans must require firefighters to open or enter BESS compartments. Operator to remotely monitor and shut down live systems, company representative on-site 60 minutes of a 003 call. Basic firefighting equipment to be provided during construction, decommissioning and maintenance. Regular engagement with Regional SACFS for on-site training and site inductions.	Noted. The proponent confirms that the SEO Table FR1, requires that a Fire and Emergency Response Management Plan be prepared and form part of the SRMNP and CEMP. These can be reviewed annually and up-dated as required, with updated versions forwarded to the relevant SACFS Regional Office. Emergency response plans will be designed with first responder safety as the primary objective – to confirm, firefighters will not be required to open or enter BESS compartments under any circumstances. SCADA remote monitoring and automated shutdown capability will be operational from commissioning, enabling remote management of all live systems. The Management Plan will document in more detail the specific, existing or incident responses, provision of appropriate basic firefighting equipment on site during all construction, maintenance and decommissioning activities and will address engagement with the Regional SACFS as well as training, familiarisation and site inductions for all staff and contractors. These commitments are consistent with EIR Impact (De. FR1 Table 39) and ERI (Table 37) and the SEO.	Yes	Table 17 FR1 has been up-dated to include an annual review as a Leading Performance Criteria.
31	13/04/2026	Leah Bartholomew	SA Country Fire Service (SACFS)	Government Referral (s.73 HRE Act)	Manifest Box	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 set with white writing 'Fire Protection System' or similar, clearly visible to the crew 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, the water (i.e., fill locations), all of the protection equipment, and any on-site hazards or storage of dangerous materials (i.e., LPG, tanks 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.	SACFS recommends installation of a Manifest Box at the main site entrance (noted box with white writing 'Fire Protection System' or similar, clearly visible to fire crews). Box to contain: emergency contact numbers, the site plan showing vehicle access, turning areas, building/infrastructure locations, fire water fill points, all of the protection equipment, and on-site hazards or storage of dangerous materials. Access via Lockwood 003-type padlock (AS 4428.17).	Noted and accepted. This requirement will be incorporated into the Fire and Emergency Response Management Plan for the CEMP, OEMP and SRMNP.	Yes	Table 17 FR1 and Table 15 ERI: have been updated to include the requirement for a Manifest box at the main site entrance and emergency services are specified as part of the local communications protocol.
32	13/04/2026	Leah Bartholomew	SA Country Fire Service (SACFS)	Government Referral (s.73 HRE Act)	Building Considerations & BESS	All class 2 – 5 buildings will need to comply with National Construction Code (NCC) and to include at the minimum Deemed-to-satisfy fire and the safety provisions. Additional rules for Energy facilities or BESS: -> Access and working conditions for large emergency service vehicles to the Electrical Tensioning Area/Control room are needs to be incorporated. This includes a reasonable clear and safe working environment. -> Servicing of the detection and suppression system (if installed) within the nodes will be maintained to the manufacturer's and to SA Minimal Building Standard (MBS 002). Maintaining the performance of essential safety provisions requirements and record. -> The SACFS will not accept BESS contain 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 to the Australian Fire and Emergency Services Authorities Council, (2025) Large-scale battery energy storage system installations (AFAC Publication No. 3105), AFAC, Melbourne, Australia, Council 2025.	All Class 2-5 buildings must comply with the NCC, including minimum Deemed-to-Satisfy fire and the safety provisions. Additional requirements: access/clearance for large emergency vehicles to electrical/control room areas, detection and suppression system servicing to manufacturer and MBS 002 requirements. SACFS will not accept BESS contain fire detection system monitoring requests unless required by NCC; battery rack opening during any event is operator's responsibility. Fire Authority. Reference: AFAC Publication No. 3105 (2025) – Large-scale BESS installations.	Noted and acknowledged. As part of the detailed design process, all of these elements will be addressed and certified to comply with the National Construction Code (NCC), including all Deemed-to-Satisfy fire and the safety provisions. The detailed design will incorporate adequate access routes and clearances for large emergency vehicles to a electrical, control room and BESS areas. The proponent acknowledges and accepts full responsibility for any battery rack opening or BESS compartment access during an event – This is the operator's responsibility and will be the responsibility of the Fire Authority under any circumstances. AFAC Publication No. 3105 (2025) – Large-scale Battery Energy Storage System Installations – will be the primary reference document throughout the design, construction and operational phases. These commitments will be incorporated into the SRMNP and the Fire and Emergency Management Plan.	Yes	FR1 has been up-dated to include reference to AFAC Publication No. 3105 (2025) – Large-scale Battery Energy Storage System Installations. Table 39 (ERI) and 17 (SEO) have been up-dated – Assessment Criteria refers to current Electricity Act, NCC and SACFS design requirements.
33	24/04/2026	Jeremy Sibbald	Aboriginal Affairs and Reconciliation	Government Referral (s.73 HRE Act)	Discovery protocol	The unexpected finds protocol to be developed should as a minimum be consistent with the attached Aboriginal Heritage Discovery Protocol. At discovery of suspected human remains that be reported first to SAPOL. Discoveries of other Aboriginal heritage must be reported to the Minister via Aboriginal Affairs and Reconciliation per section 20 of the Aboriginal Heritage Act, 1988 (AH Act).	The unexpected finds protocol to be developed should as a minimum be consistent with the attached Aboriginal Heritage Discovery Protocol. At discovery of suspected human remains must be reported first to SAPOL. Discoveries of other Aboriginal heritage must be reported to the Minister via Aboriginal Affairs and Reconciliation per section 20 of the Aboriginal Heritage Act, 1988 (AH Act).	Noted and accepted. The Aboriginal Heritage Discovery Protocol has been referenced in XXX and appended to the SEO to ensure consistency of approach. The advice regarding reporting has been added as a stakeholder note.	Yes	Table 10 H1: has been up-dated to refer to the protocol, AAR advice and
34	24/04/2026	Jeremy Sibbald	Aboriginal Affairs and Reconciliation	Government Referral (s.73 HRE Act)	Best practice	In the event that Aboriginal heritage is discovered and cannot be avoided, authorities under the AH Act need to be obtained. It is best practice to continue consultation with Traditional Owners through the application for authorisations process. This requirement should be included in Proposed Controls/Management Approach at Table 32.	In the event that Aboriginal heritage is discovered and cannot be avoided, authorities under the AH Act need to be obtained. It is best practice to continue consultation with Traditional Owners through the application for authorisations process. This requirement should be included in Proposed Controls/Management Approach at Table 32.	Noted and accepted. As requested the SEO has been up-dated to include this best practice approach.	Yes	Table 10 H1: has been up-dated to include the AAR advice and the Proposed Controls/Management Approach has also been up-dated
35	6/05/2026	Ben Bruce	Department for Environment and Water	Government Referral (s.73 HRE Act)	Native Fauna	DEW notes that native fauna is not included in the SEO within table F1 for the Operational Management Plan (OMP). Whilst there may be lower risk of injury or impacts to native fauna during this stage DEW recommends the OMP is included in this section to ensure management or injuries to native animals is adequately addressed during the operational stage, for example in the case of entanglement of native fauna in fencing or injury from vehicle movement.	DEW notes that native fauna is not included in the SEO within table F1 for the Operational Management Plan (OMP). Whilst there may be lower risk of injury or impacts to native fauna during this stage DEW recommends the OMP is included in this section to ensure management or injuries to native animals is adequately addressed during the operational stage, for example in the case of entanglement of native fauna in fencing or injury from vehicle movement.	Noted and accepted. The SEO table relating to Fauna has been up-dated to include the Operational Management Plan. The OEMP would include a relevant section on the water.	Yes	Table 4 F1: has been up-dated to include the operational phase
36	6/05/2026	Ben Bruce	Department for Environment and Water	Government Referral (s.73 HRE Act)	Heritage - Non-Aboriginal	Heritage - Non-Aboriginal: DEW agrees with the applicant's assessment of no known heritage impacts on the project site or within close proximity. Due to this, DEW considers there is a low risk of the project encountering archaeological features of potential significance although DEW recommends measures to protect any potential heritage values found during any stage of the project's 25-30 year life. DEW considers there is a low risk of the project encountering archaeological features of potential significance. Despite the risk being considered low for encountering archaeological features of potential significance, DEW advises that the EIR and SEO need to include measures to ensure that, any historical archaeological features uncovered during any stage of the project is protected and managed in accordance with the Heritage Places Act 1993. Further to this, any activities authorised under the Hydrogen and Renewable Energy Act 2023 must not contravene the requirements of the Heritage Places Act 1993.	Heritage - Non-Aboriginal: DEW agrees with the applicant's assessment of no known heritage impacts on the project site or within close proximity. Due to this, DEW considers there is a low risk of the project encountering archaeological features of potential significance although DEW recommends measures to protect any potential heritage values found during any stage of the project's 25-30 year life. Heritage: DEW considers there is a low risk of the project encountering archaeological features of potential significance. Despite the risk being considered low for encountering archaeological features of potential significance, DEW advises that the EIR and SEO need to include measures to ensure that, any historical archaeological features uncovered during any stage of the project is protected and managed in accordance with the Heritage Places Act 1993. Further to this, any activities authorised under the Hydrogen and Renewable Energy Act 2023 must not contravene the requirements of the Heritage Places Act 1993.	Noted. The applicant highlights that this is a proposal for infrastructure. Once constructed, infrastructure does not move, change location or disturb unused land. It is possible that future works may be required (e.g. up-grades to access) at which point the "construction" phase objectives become relevant again. The applicant appreciates the Agency's design to be thorough if it is considered unnecessary to require a management plan for an event that highly unlikely to occur. Furthermore, the SEO does not require the requirement for all landowners to conform to all relevant laws.	No	
37	6/05/2026	Ben Bruce	Department for Environment and Water	Government Referral (s.73 HRE Act)	Protected Fauna	Protected Fauna: During each stage of the proposed development and any investigations or assessments on the project site, should the applicant need to catch, move, relocate or destroy any protected animal or stage, the applicant is required to apply for a permit under South Australian legislation to DEW. Further information can be obtained at DEW's website to apply for a permit to capture, release or destroy wildlife.	Protected Fauna: During each stage of the proposed development and any investigations or assessments on the project site, should the applicant need to catch, move, relocate or destroy any protected animal or stage, the applicant is required to apply for a permit under South Australian legislation to DEW. Further information can be obtained at DEW's website to apply for a permit to capture, release or destroy wildlife at: (two web site links provided)	Noted and accepted. This advice and links is already included in Table F1 under 'Stakeholder Views'	No	
38	6/05/2026	Ben Bruce	Department for Environment and Water	Government Referral (s.73 HRE Act)	Historical Archaeology	DEW recommends that all management plans include the following risk mitigation strategies for historical archaeology: - Completion of supporting heritage impact assessment. - Development of a CEMP and OMP with project specific management and mitigation measures to include: - All workers to undergo site inductions for historical archaeology. - Implementation of an unexpected historical archaeological discovery procedure (stop work, engage archaeologist) to assess significance of the find, and commence work only once authorisation received from the archaeologist. - Immediate reporting to DEW if a subsided of heritage significance is disturbed without appropriate permit/consent. - Reporting to DEW of any other event where unknown historical heritage is discovered. SEO Amended: F1 is amended to include that "No disturbance to native fauna unless prior approval under the relevant legislation is obtained".	DEW recommends that all management plans include the following risk mitigation strategies for historical archaeology. Completion of supporting heritage impact assessment. Development of a CEMP and OMP with project specific management and mitigation measures to include: All workers to undergo site inductions for historical archaeology. Implementation of an unexpected historical archaeological discovery procedure (stop work, engage archaeologist) to assess significance of the find, and commence work only once authorisation received from the archaeologist. Immediate reporting to DEW if a subsided of heritage significance is disturbed without appropriate permit/consent. Reporting to DEW of any other event where unknown historical heritage is discovered. SEO Amended: F1 is amended to include that "No disturbance to native fauna unless prior approval under the relevant legislation is obtained".	Noted. The approach is noted and generally supported. For the reasons specified above, this is considered relevant to those phases of the project that involve land disturbance, construction and decommissioning/rehabilitation. The Heritage (H1) table already requires and Archaeological and Cultural Heritage Management Plan, including a stop work procedure. The table has been up-dated to provide more detail on the contents of the ACRMP. It is also noted that the reporting in the SEO includes immediate reporting to DEW of any disturbance to Aboriginal and non-Aboriginal heritage (with appropriate permits and approvals) and Reportable Incident "An event where an excavation outside a culturally cleared area has occurred or the conditions of a cultural heritage clearance have not been complied with (other than an immediately reportable incident)".	Yes	Table 10 H1: updated to further clarify the content of the ACRMP
39	6/05/2026	Ben Bruce	Department for Environment and Water	Government Referral (s.73 HRE Act)	Native Fauna	SEO Amended: F1 is amended to include that "No disturbance to native fauna unless prior approval under the relevant legislation is obtained".	SEO Amended: F1 is amended to include that "No disturbance to native fauna unless prior approval under the relevant legislation is obtained".	Noted and accepted	Yes	Table 4 F1: requirement included under Assessment Criteria
40	6/05/2026	Ben Bruce	Department for Environment and Water	Government Referral (s.73 HRE Act)	Greenhouse gas emissions	SEO Amended: Minimise greenhouse gas emissions during construction, operation, decommissioning and rehabilitation phases.	SEO Amended: Minimise greenhouse gas emissions during construction, operation, decommissioning and rehabilitation phases.	The applicant does not accept this change. While this is admirable aim, it lacks clarity in terms of the specific actions that would be required and does not relate to any specific impact event.	No	
41	6/05/2026	Ben Bruce	Department for Environment and Water	Government Referral (s.73 HRE Act)	Historical Archaeology	SEO Amended: No damage, disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and places unless authorised under the relevant legislation.	SEO Amended: No damage, disturbance or interference to Aboriginal heritage and non-Aboriginal heritage sites, objects, remains and places unless authorised under the relevant legislation.	Noted and accepted. The Heritage (H1) table already includes two similar statements but it is acknowledged that the proposed statement has greater clarity.	Yes	Table 10 H1: Updated to replace existing statement with proposed under Assessment Criteria
42	6/05/2026	Ben Bruce	Department for Environment and Water	Government Referral (s.73 HRE Act)	Reportable Incidents	The SEO has an appropriate immediately reportable incident related to adverse impacts on biodiversity.	The SEO has an appropriate immediately reportable incident related to adverse impacts on biodiversity.	Noted. As indicated above, the SEO already includes reference to reporting in relation to native vegetation and fauna. It is not clear what other "incident" should be reported.	No	
43	6/05/2026	Ben Bruce	Department for Environment and Water	Government Referral (s.73 HRE Act)	Native Fauna	Native Fauna: Impacts and mitigation measures on native fauna are recommended to be reconsidered to include impacts at the operational stage of the project in relation to the management of native fauna, including potential risk of injury due to factors such as collisions with vehicles or any entanglement in fencing or other infrastructure.	Native Fauna: Impacts and mitigation measures on native fauna are recommended to be reconsidered to include impacts at the operational stage of the project in relation to the management of native fauna, including potential risk of injury due to factors such as collisions with vehicles or any entanglement in fencing or other infrastructure.	Noted and accepted. SEO table F1 has been up-dated to include potential fauna impacts during operation phase.	Yes	Table 4 F1: has been up-dated to include the operational phase
44	6/05/2026	Ben Bruce	Department for Environment and Water	Government Referral (s.73 HRE Act)	Native Fauna	DEW recommendations regarding permits required to catch, move, relocate or destroy any protected animal or stage need to be incorporated into the relevant management plan during each stage of the proposed development and any investigations or assessments on the project site. Further, to manage situations where there is injury to native fauna, management plans need to incorporate relevant assessments and procedures.	DEW recommendations regarding permits required to catch, move, relocate or destroy any protected animal or stage need to be incorporated into the relevant management plan during each stage of the proposed development and any investigations or assessments on the project site. Further, to manage situations where there is injury to native fauna, management plans need to incorporate relevant assessments and procedures.	Noted and accepted. SEO table F1 has been up-dated to include potential fauna impacts during operation phase.	Yes	Table 4 F1: has been up-dated to include the operational phase
45	6/05/2026	Ben Bruce	Department for Environment and Water	Government Referral (s.73 HRE Act)	Native Fauna	As recommended above DEW recommends updating the SEO and EIR in relation to Native Fauna management to include "Applicable New South Wales Native Fauna legislation" and the following codes of practice for humane destruction of wildlife where relevant for any injured native animal on site (refer to DEW website for relevant codes of practice). The Animal Welfare Act 1985 can be referred to if there is not a relevant code on DEW's website and additionally advice for management of wildlife can be referred to within Table 5.2 on the DEW website, species specific information on the native fauna is also available via DEW's website.	As recommended above DEW recommends updating the SEO and EIR in relation to Native Fauna management to include "Applicable New South Wales Native Fauna legislation" and the following codes of practice for humane destruction of wildlife where relevant for any injured native animal on site which is located at: (relevant web links provided). The Animal Welfare Act 1985 can be referred to if there is not a relevant code on DEW's website and additionally advice for management of wildlife can be referred to within Table 5.2 with a link to the DEW's website advice located at: https://www.environment.sa.gov.au/topics/animals-and-plant-life/wildlife-and-species-specific-information-on-the-native-fauna-including-general-fauna-links (provided)	Noted and accepted. SEO Table F1 has been updated to include the information that is additional to what has already included.	Yes	Table 4 F1: has been up-dated to include the Codes of Practice and web links.

Further information

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