



Consultation by the Minister

Snowtown 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 - Snowtown BESS EIR and SEO

In accordance with the Act and Regulations, the **Snowtown 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 15 November 2025 and 9 January 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* (15 November 2025), *Plains Producer* (19 November 2025), *Yorke Peninsula Country Times* (19 November 2025) and *Port Pirie Recorder* (20 November 2025).

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

- Attorney Generals Department – Aboriginal Affairs and Reconciliation (AAR)
 - Commissioner of Highways (DIT)
 - Wakefield Regional Council
 - Department for Environment and Water (DEW)
-

-
- 
- Department for Housing and Urban Development (DHUD)
 - Department of Primary Industries and Regions (PIRSA)
 - Northern and Yorke Landscape Board (NYLB)
 - Native Vegetation Council (NVC)
 - Office of the Technical Regulator (DEM-OTR)
 - South Australian Country Fire Service (CFS)

No public submissions were received pursuant to regulation 39. Responses were received from referral bodies pursuant to regulation 40 from Wakefield Regional Council, DEW, DHUD, PIRSA, NVC, DEM-OTR and CFS. The submissions are provided below in Appendix A.

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



Appendix A – Submissions received

From: [REDACTED]
To: [REDACTED]; [DEM:Energy Regulation](#)
Cc: [REDACTED]
Subject: HRE Act referral - Request for comment: Snowtown BESS EIR & SEO
Date: Wednesday, 7 January 2026 3:11:33 PM
Attachments: [image008.jpg](#)
[image023.png](#)
[image010.jpg](#)
[image012.jpg](#)
[image014.jpg](#)
[image016.jpg](#)
[image018.png](#)
[image020.jpg](#)
[image022.jpg](#)

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Good afternoon [REDACTED],

Council has reviewed the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) for the construction and operation of the Snowtown Battery Energy Storage System (BESS) proposed to be sited adjacent the existing Snowtown substation on Wokurna Road (Lot 101 Hewitt Road Wokurna).

Council noted the following considerations relating to the Traffic Impact Assessment.

It is expected that the construction traffic will access the site via either of the two routes below: —

- Traffic generated from the south (general deliveries, quarry materials, personnel): - Augusta Highway – Wokurna Road (east);*
- Traffic generated from the north (concrete supply): — Upper Yorke Road – Wokurna Road (west).*

Wokurna Road is a locally maintained road, extending approximately 23.5 km between Upper Yorke Road and the Augusta Highway and passing immediately adjacent to the Project Area by the junction with Hewitt Road about 8 km west of the August Highway.

It is suggested that prior to the commencement of construction activities along Workurna Road, Tilt Renewables, through its delivery contractor, should arrange conditions surveys to be undertaken along the key access roads that may be used during the Project. This will provide a basis for restoring any Project related damage upon completion, if required. — The construction contractor should ensure that the roads are maintained in an appropriate condition to provide safe movement along them. This will include routine maintenance to clear roads and junctions of loose material, repairing potholes and sections of worn payment, ad-hoc maintenance to restore pavements following inclement weather. This includes dust suppression during dry periods.

Council have concerns with the projected increase of traffic (30 – 60%) on Wokurna Road during the construction phase, particularly heavy vehicles and the potential impact on the unsealed surface reducing the expected life and potential bringing forward future renewal. Council supports the above suggestions and therefore request that Tilt Renewables provide conditions surveys of Wokurna road during the construction phase and that Tilt Renewables provide a written agreement to ensure that the Wokurna Road is maintained and repaired where necessary.

Council supports all other aspects of the construction and operation phase as detailed in the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO).

Kind regards



Planning Officer

Ph 08 8862 0800| Fx 08 8862 1115 | www.wrc.sa.gov.au
Scotland Place, PO Box 167, Balaklava SA 5461



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DEW-D0033918



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Department for Environment
and Water

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Ph: +61 8 8204 1910
www.environment.sa.gov.au

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

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

Dear [REDACTED]

Project: Snowtown BESS
Application: Associated Infrastructure Licence under the HRE Act
Applicant: Tilt Renewables Australia Pty Ltd (trustee for Snowtown BESS Project Trust)
Project Area: Corner Wokurna and Hewitt Road, Wokurna, South Australia
CT 6210/929 and CT 6232/117
10 km north-west of Snowtown in South Australia's Mid North Region

Thank you for your email dated 17 November 2025, inviting the Department for Environment and Water (DEW) to comment on the application from Tilt Renewables Australia Pty Ltd for an Associated Infrastructure Licence under the *Hydrogen and Renewable Energy Act 2023* (HRE Act) in relation to the Snowtown Battery Energy Storage System (BESS).

DEW has reviewed the applicant's draft Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) for matters that fall within the DEW's area of responsibility pursuant to section 73 and regulation 40 of the HRE Act and regulations.

DEW is pleased to note that previous comments made on the pre-lodgement drafts of the EIR and SEO regarding water resources and native fauna were addressed apart from one matter related to fauna management, which is detailed below.

DEW recommends that management of native fauna is more comprehensively addressed in the EIR and SEO including environmental objectives that reflect assessment criteria, including the *National Parks and Wildlife Act 1972*, and performance criteria that clearly set out appropriate procedures to reduce impacts on native fauna in all management plans across all stages of the project.

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During each stage of the proposed development and any investigations or assessments on the project site, if the applicant needs to catch, move, relocate or destroy any protected animal or eggs, the applicant is required to apply for a permit under the *National Parks and Wildlife Act 1972*. Further information on permits to capture, release or destroy wildlife can be found at DEW's website:

<https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/capture-release>

<https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/destroy>

These comments are provided to assist you in undertaking the environmental assessment of this application and DEW officers are available to work with you and the applicant as the AIL requirements are finalised.

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

Yours sincerely

[REDACTED]

[REDACTED]

CHIEF EXECUTIVE

21/01/2026

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From: [REDACTED] (DHUD)
To: [REDACTED] (DEM)
Cc: [DEM:Energy Regulation](#)
Subject: FW: HRE Act referral - Request for comment: Snowtown BESS EIR & SEO
Date: Friday, 19 December 2025 12:25:24 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.gif](#)

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Hi [REDACTED]

I refer to the proposed Snowtown Battery Energy Storage System (BESS) by Tilt Renewables Australia Pty Ltd (trustee for Snowtown BESS Project Trust), located approximately 10km north-west of Snowtown.

Thank you for your email dated 17 November 2025 requesting comment under Sections 73(2)&(4) of the *Hydrogen and Renewable Energy Act 2023* (the Act) in relation to Tilt Renewables’ application for an Associated Infrastructure Licence (AIL).

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

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

Criteria	Advice
Land Use	The subject site is located within the 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 13 hectares and is located directly west of the existing Snowtown substation. The project is expected to have an operational lifespan of approximately 20 years. At the end of the project the infrastructure will be decommissioned. Recommendations ■ If a licence is granted, condition(s) relating to decommissioning should be included, to facilitate the removal of infrastructure and return of impacted

	land to primary production (if desired by the landowner(s)).
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>Setbacks and Visual Impact</u> 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 aerial photo show that the nearest residential dwelling is located less than 1 kilometre to the west of the facility. It should be confirmed that the visual impact on the nearby sensitive receivers is acceptable. <u>Bushfire Risk</u> The application has been accompanied with a Preliminary Hazard Analysis which recommends the Completion of the Fire Safety Study to determine the Asset Protection Zone (APZ) and radiant heat flux. It is recommended that it be confirmed the proposed site plan is able to accommodate the asset protection zone having regard to the siting of proposed infrastructure and exiting vegetation. <u>Recommendations</u> ■ A condition requiring ongoing vegetation management within the asset protection zone is recommended.
Regional Plans	The subject site is within the Yorke Peninsula and Mid North regional planning area. The current policy framework relevant for the subject site is the Mid North Regional Plan (2011). The Plan notes that the region has been identified by the Australian Electricity Market Operator (AEMO) as a key renewable energy zone. Long term strategic objectives for energy are provided under the Energy table. Objective 5 is to facilitate renewable energy generation and storage including small scale decentralised energy supplies to support agriculture, industry and communities in isolated locations. As required by s64(1) of the PDI Act, the State Planning Commission has initiated the process to prepare a new regional plan. The draft Yorke Peninsula and Mid North Regional Plan identifies the emerging renewable energy sector as a key contributor to the region's economic landscape. <u>Recommendations</u> NA
State Planning Policies	The proposal directly relates to State Planning Policy 12 (Energy) which seeks the facilitation of renewable energy facilities where the impact on surrounding land uses, regional communities and the natural and built environment can be minimised. Various other SPPs are relevant including SPP 4 which seeks to maintain and

	enhance South Australia's biodiversity and life supporting functions. The impact of the development on native vegetation and biodiversity will be considered under the <i>Native Vegetation Act 1991</i> and <i>EPBC Act 1999</i>. Recommendations NA
Previous decisions	The subject site is adjacent to the existing Snowtown substation. The EIR has considered the cumulative visual impacts of the development when considered alongside other existing or planned developments in the area. Recommendations NA
Other matters	The existing allotment boundaries may conflict with the location of proposed infrastructure. It is queried whether the intent is to undertake a boundary realignment as part of the development. The Limited Land Division overlay applies which does not envisage the creation of allotments smaller than the Minimum Site Area applying to the land. Recommendations NA

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

Kind regards



Project Lead, Crown and Impact Assessment
Planning and Building

Department for Housing and Urban Development



W dhud.sa.gov.au

Level 10, 83 Pirie St, Adelaide SA 5000



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

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Government of South Australia
Department of Primary Industries
and Regions

Our reference: A7287870

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EXECUTIVE

Level 21
11 Waymouth Street
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GPO Box 1671
Adelaide SA 5001
Tel (08) 8429 0216

www.pir.sa.gov.au

[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 Snowtown 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 advise that the Department of Primary Industries and Regions have no comments to provide on the Environmental Impact Report and Statement of Environmental Objectives.

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

9 / 01 /2026

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Native Vegetation Council

Our ref
Your Ref

81-95 Waymouth Street
Adelaide SA 5000

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

GPO Box 1047
Adelaide SA 5001

Ph| 08 8303 9777

06 January 2026

nvc@sa.gov.au

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

Dear [REDACTED]

Thank you for the opportunity to provide comments on Tilt Renewables' application under the *Hydrogen and Renewable Energy Act 2023* for an Associated Infrastructure Licence to develop the Snowtown Battery Energy Storage System (BESS) Project. The Council appreciates the inclusion of the Data Report and the proponent's efforts to address its previous comments.

The Native Vegetation Council (Council) is an independent statutory body established under the *Native Vegetation Act 1991* (NV Act). Its functions include keeping the condition of native vegetation in the State under review and advising in relation to the preservation, enhancement and management of existing native vegetation. 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.

Under section 15 of the NV Act, the A/ Team Leader, Assessments and Compliance has delegation to respond to this referral on the Council's behalf.

I note that:

- Snowtown BESS Project Trust, a related entity of Tilt Renewables Australia Pty Ltd, is proposing to develop a 100-megawatt BESS to ensure grid stability for the adjoining Snowtown I Wind Farm.
- The Project is located north-west of the township of Snowtown, approximately 150 km north of Adelaide, South Australia. The proposed project area comprises an area of approximately 13 hectares.
- The project area largely consists of predominantly cleared farming land. Remnant native vegetation exists within adjacent roadside reserves.

- The provided Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) detail the development of the BESS and related infrastructure.
- The EIR's inclusion of the following potential direct and indirect impacts that the project may engender:
 - o Direct: native vegetation clearance vegetation along the road reserve for the site entrances and exits
 - o Indirect: altered hydrology, water quality impacts, and dust generation
- The project is designed to avoid areas within the locality of potential habitats for Commonwealth and State listed threatened species, which are concentrated around vegetation associations situated in roadside reserves.
- The proponent will submit a Level 2 Clearance Application to Council, reflecting the potential for VA A1 and VA A2 to provide habitat for Pygmy Blue-tongue Lizards, Southern Whiteface, and Yellow-tailed Black Cockatoo. The proposed clearance footprint is detailed in the EIR (page 17) and appended Data Report (see Appendix C).
- A Data Report from a Council Accredited Consultant is appended to the EIR. The Data Report details Significant Environmental Benefit (SEB) calculations, noting that the total SEB points required for the clearance of 0.0247 ha is 0.69. The proponent intends to offset this clearance via a payment of \$586.58 into the Native Vegetation Fund. This payment includes a \$30.58 administration fee.
- Further detail regarding environmental management strategies will be contained within the future draft Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP), which will be developed to comply with legislative requirements. These documents will also discuss the proponent's approach to reducing the indirect impacts of altered hydrology and dust generation. Assessment criteria include:
 - o No unauthorised clearance of native vegetation
 - o Enlisting an appropriately qualified professional to collect and report on all ecological data in accordance with *Hydrogen and Renewable Energy Regulations 2024* 32(2)(c)

On behalf of the Council, I provide the following comments:

- The Data Report notes that the proposed clearance is **Seriously at variance** with Principle of clearance 1(b) of the NV Act. Under the NV Act, the Council must not make a decision that is seriously at variance with those principles unless the SEB is deemed suitable to outweigh the value of retaining the vegetation and/or the provided moderating factors sufficiently minimise risk. The proponent notes the lack of suitable or important habitat for Southern Whiteface, Pygmy Blue-tongue Lizard, and Yellow-tailed Black Cockatoo.
- When submitting applications for clearance under the *Native Vegetation Regulations 2017*, the proponents must have regard to, and give effect to, the mitigation hierarchy. Details regarding the mitigation hierarchy are outlined in the Department for Environment and Water's 'Mitigation Hierarchy' page¹. The EIR and Ecological

¹ See: <https://www.environment.sa.gov.au/topics/native-vegetation/clearing/mitigation-hierarchy>

Assessments contain some information about the proponent's intent to 'avoid' and 'minimise' clearance where possible. Notable project measures include:

- Selecting a project site within previously cleared land,
 - Situating the proposed BESS in close proximity to the substation, thereby avoiding the potential for additional clearance to facilitate connection,
 - Avoiding the clearance of intact vegetation and habitats, including observed *Maireana rohrlachii* (Rohrlach's Bluebush), *Acacia pycnantha* over exotic herbs and grasses, and woodlands with tall trees or dense tree cover
 - Micro-siting primary access points to avoid and/or minimise impacts on remnant native vegetation, where possible,
 - Rehabilitating the site by removing Declared weeds under the *Landscape South Australia Act 2019*, and,
 - Offsetting clearance via a payment into the Native Vegetation Fund.
- The Council appreciates the proponent's efforts to avoid impacts to higher quality vegetation in proximity to the Project Area, including *Acacia pycnantha* over exotic herbs and grasses and the *Maireana rohrlachii* (Rohrlach's Bluebush) located within the vicinity of Hewitt Road. As previously noted, the Council strongly encourages that, where possible, the project design avoids the clearance of vegetation that is growing or is situated on land comprising a road reserve, as it is considered to be of significant ecological value, often containing threatened plant species and vegetation communities that may provide habitat for native wildlife.

The Council welcomes future opportunities to discuss any clearance of native vegetation and provide comment on future drafts of the CEMP and OEMP.

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

Yours sincerely

[REDACTED]

[REDACTED]

A/ Team Leader, Assessments and Compliance
NATIVE VEGETATION BRANCH

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From: DEM:OTR Electricity Infrastructure <otr.electricityinfrastructure@sa.gov.au>
Sent: Wednesday, 7 January 2026 3:24 PM
To: [REDACTED]
Cc: DEM:Energy Regulation <DEM.EnergyRegulation@sa.gov.au>; [REDACTED]
Subject: RE: HRE Act referral - Request for comment: Snowtown BESS EIR & SEO

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Hi [REDACTED]

Further to [REDACTED]'s comments of 18/11/2025:

From: DEM:OTR Electricity Infrastructure <otr.electricityinfrastructure@sa.gov.au>
Sent: Tuesday, 18 November 2025 10:02 AM
To: [REDACTED]
Subject: RE: HRE Act referral - Request for comment: Snowtown BESS EIR & SEO

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Hi [REDACTED]

The Snowtown BESS received OTR certification on 13 May 2025, and the proposal appears consistent with the certificate issued.

Regards,

Jurisdictional System Security Engineer

Department for Energy and Mining
[REDACTED]

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The Snowtown BESS SEO does not mention (in section 4 Reporting) electric shock, electrical burns or prescribed fire reporting under the *Electricity Act 1996* section 63 and Electricity

(General) Regulations 2012 regulation 70.

A SRMTMP approved under the Electricity Act is maintained by Tilt Renewables for the Snowtown 1 Windfarm so they should have no issue with meeting SRMTMP submission requirements for the new BESS.

Regards,

[REDACTED]
Senior Electrical Officer

Department for Energy and Mining
[REDACTED]

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SA CFS Development Assessment Services

BUSHFIRE PLANNING HAZARD PROTECTION RESPONSE

Application	Crown Development (Energy Infrastructure Facility)
Nature of Development	A 100-megawatt (MW) Battery Energy Storage System (BESS) with up to 4-hour duration, including onsite buildings, and ancillary infrastructure
Development Number	N/A
Development/Property Name	Snowtown BESS
Location	Located approximately 10 kilometres (km) northwest of Snowtown in South Australia – 823 Wokurna Road, Wokurna
Owner	Tilt Renewables Australia Pty Ltd
Applicant	WSP Australia Pty Ltd (WSP)

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 – General) Overlay
Fire Authority/ Response Area	South Australian Country Fire Service

DECISION/SUMMARY

The South Australian Country Fire Service (SACFS) welcomes and supports development in regional and rural areas of South Australia. SACFS has no objection in principle with the proposal, but provide these comments for your attention.

This advice/comment is relevant to the following documents:

- Snowtown BESS Environmental Impact Report Nov 2025
- Snowtown BESS Statement of Environmental Objectives Nov 2025

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

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

Bushfire Hazard Overlay

The site is located within the areas designated:

- Hazards (Bushfire – General) Overlay

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

DO 1 Development, including land division responds to the 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 Mundoorra Brigade 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 alike should be located no less than 17 metres from the property boundaries or existing remnant vegetation being retained, for the purposes of maintaining an APZ.

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 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.
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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 alike as follows:
 - The understorey plants within the Vegetation Management Zone (VMZ) 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 VMZ 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 proposal does not meet all the requirements below.

Fire 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 water supply shall be constructed of all-weather construction, with a minimum formed road surface width of 3 metres.
- Fire tanks shall be identified with signage in accordance with AS 2419.1.
- Provision shall be made adjacent the water supply 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 6 metres from the water supply outlet.
- **The water supply 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 on a regular base with 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 within the racks will be maintained to the manufactures 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 Service.
- 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: [REDACTED] Manager DAS	Signature: [REDACTED]	Date: 28/11/2025
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Appendix B – Responses to submissions received (excerpt from EIR)

Table H.1 Response to comments raised by prescribed referral bodies during consultation by the Minister under Section of the *Hydrogen and Renewable Energy Act 2023*

Referral body	Comment raised by referral body	Steps (if any) taken or proposed to be taken by the licensee to address those comment
CFS	<i>Bushfire Hazard Overlay</i> <i>The site is located within the areas designated:</i> — <i>Hazards (Bushfire – General) Overlay</i> <i>The Desired Outcomes (DO) for the Hazards (Bushfire – General) Overlay identifies:</i> <i>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.</i> <i>DO 2 To facilitate access for emergency service vehicles to aid the protection of lives and assets from bushfire danger.</i>	None required.
CFS	<i>Fire Response Capability</i> <i>The site is within the Mundoora Brigade fire station (CFS) response area.</i>	None required.
CFS	<i>Land Use</i> <i>Performance outcomes for Land Use do not apply in this hazard overlay.</i>	None required.
CFS	<i>Siting</i> <i>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.</i> <i>SACFS recommends all buildings and infrastructure such as Substation, Inverter stations, BESS and Control Buildings or alike should be located no less than 17 metres from the property boundaries or existing remnant vegetation being retained, for the purposes of maintaining an APZ.</i> <i>See Access/Egress and Vegetation Management recommendations for more detail [below].</i>	As discussed in Section 4.3.2.3 and Appendix G of the EIR, the Project has committed to maintain a standard 10 metre (m) (minimum) perimeter asset protection zone. Tilt Renewables acknowledges the CFS’s recommendation to maintain a 17 m setback for Substation, Inverter stations, BESS and Control Buildings from property boundaries or remnant vegetation and confirms that this recommended setback is met through the current indicative Project layout presented in Figure 4.1 of the EIR. Tilt Renewables will seek to maintain this 17 m setback for the relevant components through to detailed design, with any deviation to be subject to final approval by the CFS. It is noted that the recommended setback is not applicable to the ‘substation’ given that the existing Snowtown substation was subject to previous planning approvals and is built.
CFS	<i>Access/Egress</i> <i>Any future internal road networks should be designed to achieve compliance with the ‘Roads’ Performance Outcome relevant to the hazard overlay.</i> <i>SACFS notes the proposal does include roads of adequate design to satisfy the desired outcomes of this hazard overlay.</i> <i>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.</i> <i>All access/egress roads on the project site:</i> — <i>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.</i> — <i>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.</i> — <i>Shall be constructed with a formed, compacted, self-draining, all-weather surface.</i> — <i>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:</i> — <i>Passing bays minimum width of 6 metres and length of 17 metres, or</i> — <i>‘T’ or ‘Y’ shaped turning area with a minimum formed length of 11 metres and minimum internal radii of 9.5 metres.</i> — <i>Incorporating cul-de-sac endings or dead end roads has either:</i>	As noted in the CFS comments, the indicative Project layout currently meets the design specification of Deemed to Satisfy/Designated Performance Feature 5.1 under the Hazards (bushfire – general risk) Overlay of the Planning and Design Code. Tilt Renewables will seek to maintain these specifications through to the detailed design stage, with any deviation in the final design to be discussed with the CFS. As depicted in Figure 4.1 of the EIR, the proposed internal road network includes roads with a minimum width of 6 m which provide separation between Project infrastructure and areas of roadside vegetation and cropping land.

Referral body	Comment raised by referral body	Steps (if any) taken or proposed to be taken by the licensee to address those comment
	— <i>A turning area with a minimum formed surface radius of 12.5m, or</i> — <i>‘T’ or ‘Y’ shaped turning area with a minimum formed length of 11 metres and minimum internal radii of 9.5 metres.</i> — <i>Shall be constructed with a minimum external radius of 12.5m for all road curves.</i> — <i>Shall not exceed a gradient of 16 degrees (29%).</i> — <i>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.</i> — <i>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.</i> — <i>Shall allow fire-fighting vehicles to safely enter and exit the site in a forward direction by incorporating a loop road around the site.</i> — <i>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.</i> Note: Other fire safety measures pertaining to roads may be prescribed by the National Construction Code.	
CFS	Vegetation Management (buildings and infrastructure such as Substation, Inverter stations, BESS and Control Buildings): — <i>Vegetation management shall be established and maintained within 17 metres of each Substation/Control Building/BESS or alike as follows:</i> - o <i>The understorey plants within the Vegetation Management Zone (VMZ) 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.</i> — <i>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).</i> — <i>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)</i> — <i>The VMZ shall be maintained to prevent the accumulation of dead vegetation during the fire danger season.</i> — <i>A single row of trees and/or shrubs are permitted for screening purposes, in accordance with the below:</i> — <i>Located no less than 10 metres from all infrastructure and not connected to other hazardous vegetation.</i> — <i>Located no less than 10 metres from the access road.</i> — <i>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.</i> — <i>Screening plants should have low flammability characteristics, be kept in optimum health, pruned regularly and any dead vegetation removed.</i>	As discussed above, Tilt Renewables acknowledges the CFS’s recommendation to maintain a 17 m setback for Project infrastructure from property boundaries and existing remnant vegetation. This recommended setback is met through the current preliminary design presented in this EIR, and Tilt Renewables will seek to maintain this through to the detailed design stage, with any deviation in the final design be subject to approval from the CFS. It is noted that the recommended setback is not applicable to the ‘substation’ given that the existing Snowtown Substation was subject to previous planning approvals and is built. The allowance for a single row of trees and/or shrubs for screening purposes is acknowledged. At this stage of the Project, no vegetation screening is proposed.

Referral body	Comment raised by referral body	Steps (if any) taken or proposed to be taken by the licensee to address those comment
CFS	Water Supply <i>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.</i> <i>SACFS notes the proposal does not meet all the requirements below.</i> <i>Fire 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:</i> — <i>Access to the water supply shall be constructed of all-weather construction, with a minimum formed road surface width of 3 metres.</i> — <i>Fire tanks shall be identified with signage in accordance with AS 2419.1.</i> — <i>Provision shall be made adjacent the water supply 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 6 metres from the water supply outlet.</i> — <i>The water supply 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.</i>	As discussed in Appendix G of the EIR, the final arrangement and capacity of the static water tanks will be subject to detailed design and will consider the requirements of the CFS, as discussed in Section 4.3.2.3 of the EIR. This section of the EIR was previously updated in response to CFS feedback to specify the following: <i>‘...The water storage tanks will incorporate the following:</i> — <i>Final capacity of water storage tanks on site to be determined in consultation with CFS based on the outcomes of the detailed design process</i> — <i>Incorporate both large and small-bore suction outlets as per South Australian Fire Authorities Built Environment Section Policy No. 14: Above Ground Water Storage Tanks for Fire Fighting Purposes (2016)</i> — <i>Be serviced by all-weather access tracks, with a minimum formed road surface width of 3 m</i> — <i>Be signed in accordance with AS 2419.1 Fire hydrant installations</i> — <i>Incorporate an adjacent, nominally level hardstand area (capable of supporting fire-fighting vehicles with a gross vehicle mass of 21 tonnes) that is a distance equal to or less than 6 m from the water supply outlet</i> — <i>Be capable of servicing the BESS containers within 90 m of hose lay of the static fire water tank (unless otherwise services by an alternative static water tank or dry hydrant system’).</i> No further updates have been made to the EIR or SEO in response to this comment. Tilt Renewables acknowledges that under the indicative Project layout provided in Figure 4.1 of the EIR, the requirement for water supply to be available to all BESS system pod/containers within 90 m of hose lay of the static fire water tank is not achieved. Further iterations of the design will seek to achieve this requirement through amendment of the existing static fire water tanks and/or inclusion of additional static fire water tanks, or alternatively, through incorporation of dry hydrant systems. The existing control measure for impact event BF2 in Table 9.3 of the EIR has been updated to specify this commitment: — <i>‘Onsite water storage tanks with the final volume to be specified in the Emergency Management Plan developed in consultation with the CFS and in consideration of the South Australian Fire Authorities Built Environment Section Policy No. 14: Above Ground Water Storage Tanks for Fire Fighting Purposes, Country Fire Authority of Victoria Design Guidelines and Model requirements for Renewable Energy Facilities (CFA Guidelines) and AS 2419.1-2021 Fire hydrant installations. <u>Onsite water storage tanks shall be designed such that, at a minimum, water supply is available to all BESS system pod/containers within 90 metres of hose lay of the static fire water tank. Where this cannot be achieved, dry hydrant systems will be provided to the satisfaction of the CFS’.</u></i>
CFS	Emergency Response Planning <i>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.</i> <i>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.</i> <i>During the construction and decommissioning phases and whilst undertaking maintenance, proponents should provide the provision of basic fire-firefighting equipment at each site, including fire extinguishers, knapsacks, and other equipment suitable for initial response actions.</i> <i>The Company and/or its operators will be required to engage on a regular base with on-site training and site inductions for emergency service personnel.</i> <u><i>MANIFEST BOX (or similar)</i></u> <i>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,</i>	As discussed in Appendix G of the EIR, the following amendments were made to the EIR in response to these CFS requirements: — The sixth point in the key items list for the Emergency Management Plan detailed in Section 4.3.2.3 was updated with the following clarification: <i>‘emergency response actions, <u>will prioritise the safety of individuals (including but not limited to first responders), and will avoid the need for firefighters to open or enter BESS compartments at any time’.</u></i> — The ninth point for inclusions in the Construction Environmental Management Plan in Section 4.3.1.3 was updated with the following clarification: <i>‘Emergency and fire management, including a summary of the Emergency Management Plan’</i> — Induction requirements in Section 4.3.2.3 were updated to clarify: <i>‘Site personnel and visitors will be required to undertake a site induction prior to entering the site; and will include induction of key emergency management procedures. <u>Furthermore, regular engagement will be undertaken with the CFS with relation to on-site training and site inductions for emergency service personnel’.</u></i> — Section 4.3.2.3 of the EIR was updated to include the following measure: <i>‘Access to the Project Area for emergency service responders will be maintained throughout operation. This may be via installation of a Manifest Box at the main entrance of the site. The Manifest Box would have a red design with white writing ‘Fire Protection system’ or similar, designed to be visible to emergency response personnel on approach to the site. The Manifest Box would include the following information (at a minimum): a list of emergency</i>

Referral body	Comment raised by referral body	Steps (if any) taken or proposed to be taken by the licensee to address those comment
	<i>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</i>	<i>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, would be readily accessible using a Lockwood 003-type padlock, in accordance with AS 4428.17</i> Fire detection, warning, control and intercom systems – Control and indicating equipment. <i>Alternative site access arrangements may be implemented in agreement with the CFS’.</i> No further updates have been made to the EIR or SEO in response to this comment.
CFS	<i>BUILDING CONSIDERATIONS and BESS:</i> <i>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.</i> <i>Additional notes for Energy facilities or BESS:</i> — <i>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.</i> — <i>Servicing of the detection and suppression system within the racks will be maintained to the manufactures and to SA Ministerial Building Standard MBS 002 “Maintaining the performance of essential safety provisions” requirements and recorded.</i> — <i>The SACFS will not accept BESS container fire detection system monitoring requests unless required by the NCC.</i> — <i>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 Service.</i> — <i>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.</i>	As discussed in Appendix G of the EIR, the following amendments were made to the EIR in response to these CFS requirements: — The bushfire management measures listed in Section 4.3.2.3 were updated to include the following: — <i>‘Where practicable, the final design of the Project will be developed in consideration of the Australasian Fire and Emergency Services Authorities Council Large-scale battery energy storage system installations (Publication No. 3105) (2025)’.</i> — <i>‘All class 2 – 9 buildings will need to comply with National Construction Code.</i> — <i>‘Infrastructure will be serviced by a network of internal access tracks designed in consideration of the CFA Guidelines, which will be constructed of an all-weather surface and will allow movement of emergency service vehicles in a forward direction around the site. The access track network will be maintained to facilitate safe access for emergency service vehicles and site evacuation, <u>in particular facilitating access and working clearance for large emergency service vehicles to the Control Room and areas in proximity to transmission lines’.</u></i> — The mitigation measures relating to Thermal Runaway in Section 8.10.3 were updated to the following: — <i>‘To reduce the risk of a thermal runaway event, WSP (2025e) recommends the design and installation of an independent fire detection system, in addition to the Battery Management System that is expected to be inbuilt to each inverter battery module. <u>The fire detection system should be maintained in accordance with the manufacture’s specifications and Ministerial Building Standard MBS 002 ‘Maintaining the performance of essential safety provisions’</u></i> — The following clarification was added to the control measures for impact event ID BF1: <i>‘Fire detection systems will be installed in BESS Yards <u>and maintained in accordance with the manufacture’s specifications and Ministerial Building Standard MBS 002 ‘Maintaining the performance of essential safety provisions’.</u> Secure and reliable network communications within BESS yards will also be maintained’.</i> No further updates have been made to the EIR or SEO in response to this comment. Furthermore, Tilt Renewables acknowledges that the CFS will not accept BESS container fire detection system monitoring requests unless required by the National Construction Code. It should be noted that there is currently no requirement under the National Construction Code for fire monitoring systems within BESS compounds to be alarmed through the local fire brigade.

Referral body	Comment raised by referral body	Steps (if any) taken or proposed to be taken by the licensee to address those comment
DEW	DEW is pleased to note that previous comments made on the pre-lodgement drafts of the EIR and SEO regarding water resources and native fauna were addressed apart from one matter related to fauna management, which is detailed below. DEW recommends that management of native fauna is more comprehensively addressed in the EIR and SEO including environmental objectives that reflect assessment criteria, including the National Parks and Wildlife Act 1972, and performance criteria that clearly set out appropriate procedures to reduce impacts on native fauna in all management plans across all stages of the project. During each stage of the proposed development and any investigations or assessments on the project site, if the applicant needs to catch, move, relocate or destroy any protected animal or eggs, the applicant is required to apply for a permit under the National Parks and Wildlife Act 1972. Further information on permits to capture, release or destroy wildlife can be found at DEW's website: — https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/capture-release — https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/destroy	Specific fauna management measures will be developed in the Operational Management Plan (OMP). An additional assessment criteria has now been added to impact events NV1, NF1 and NF2 and Environmental Objective 1: — ‘Works are undertaken in accordance with the NPW Act’. The following assessment criteria has also been added to impact events NF1 and NF2 and Environmental Objective 1 within the EIR and SEO: — ‘A permit under National Parks and Wildlife Act 1972 is secured for any instance for which Tilt Renewables, or its contractor(s), need to catch, move, relocate or destroy any protected animal or eggs from the Project Area during any stage of the Project’. Please also note that review of these assessment criteria identified a duplication under impact events NV1 and NF1. Subsequently, the assessment criteria: ‘All ecological data collected by an appropriately qualified professional and reported in accordance with HRE Regulations 32(2)(c)’ has been deleted from these impact events, as it is addressed under the remaining assessment criteria: ‘All biodiversity data collected by an appropriately qualified professional and reported to the BDBSA and DEM pursuant to HRE Regulations 32(2)(c)’. The corresponding assessment criteria for Environmental Objective 1 has subsequently been updated to reflect this wording.
DHUD	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 13 hectares and is located directly west of the existing Snowtown substation. The project is expected to have an operational lifespan of approximately 20 years. At the end of the project the infrastructure will be decommissioned. <u>Recommendations</u> — If a licence is granted, conditions(s) relating to decommissioning should be included, to facilitate the removal of infrastructure and return of impacted land to primary production (if desired by the landowner(s)).	It is anticipated that this requirement will be achieved through the existing assessment criteria for Environmental Objective 2: — The OMP is to include a DRMP (or similar) that outlines how any infrastructure or equipment will be decommissioned and the land rehabilitated’. The following assessment criteria for Environmental Objective 2 has also been updated to emphasise that the removal of infrastructure will be included in landowner consultation: — ‘Rehabilitation (including the removal of infrastructure) undertaken in consultation with the relevant landowner and in accordance with the Environment Protection Act 1993, Landscape South Australia Act 2019 and Native Vegetation Act 1991. It can also be noted that under the existing leading performance criteria for this Environmental Objective, Tilt Renewables has committed to providing the final Decommissioning and Rehabilitation Management Plan to the Department for Environment and Mining for approval at least six months prior to commencement of decommissioning activities. It is expected that the plan will need to reasonably demonstrate that the land will be satisfactorily rehabilitated and that activities will be undertaken in accordance with relevant environmental legislation.
DHUD	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>Setbacks and Visual Impact</u> 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 aerial photo show that the nearest residential dwelling is located less than 1 kilometre to the west of the facility. It should be confirmed that the visual impact on the nearby sensitive receivers is acceptable. <u>Bushfire Risk</u> The application has been accompanied with a Preliminary Hazard Analysis which recommends the Completion of the Fire Safety Study to determine the Asset Protection Zone (APZ) and radiant heat flux. It is recommended that it be confirmed the proposed site plan is able to accommodate the asset protection zone having regard to the siting of proposed infrastructure and exiting vegetation. <u>Recommendations</u> — A condition requiring ongoing vegetation management within the asset protection zone is recommended.	It is expected that DHUD’s comment regarding ongoing vegetation management within the asset protection zone for the Project will be achieved through the existing leading performance criteria for Environmental Objective 12: — ‘Asset protection zones will be maintained throughout operation of the authorised operations. Regular inspections will be undertaken and recorded in accordance with the OMP’. It can also be confirmed that the nearest sensitive receiver to the Project is an involved stakeholder. Ongoing consultation has been undertaken with this stakeholder and at this stage of the Project no concerns regarding the location of the Project nor visual impacts have been raised. It should be noted that the Landscape Character and Visual Impact Assessment undertaken for the Project (see Appendix K of the EIR) assessed this location as a sensitive receptor requiring assessment for potential visual impacts, but subsequently recommended that the development of the Project was not likely to result in a significant impact to visual amenity at this location. It was further deemed that the implementation of vegetative screening as a mitigation measure was not considered necessary. However, in the instance that future complaints are raised by this stakeholder, Tilt Renewables would work with the stakeholder to reasonably address the complaint, as per the applicable assessment criteria under Environmental Objective 10: — ‘In the event complaints are raised from stakeholders, all reasonable measures will be taken to resolve the complaint in a timely manner’.

Referral body	Comment raised by referral body	Steps (if any) taken or proposed to be taken by the licensee to address those comment
DHUD	<i>The subject site is within the Yorke Peninsula and Mid North regional planning area. The current policy framework relevant for the subject site is the Mid North Regional Plan (2011).</i> <i>The Plan notes that the region has been identified by the Australian Electricity Market Operator (AEMO) as a key renewable energy zone. Long term strategic objectives for energy are provided under the Energy table. Objective 5 is to facilitate renewable energy generation and storage including small scale decentralised energy supplies to support agriculture, industry and communities in isolated locations.</i> <i>As required by s64(1) of the PDI Act, the State Planning Commission has initiated the process to prepare a new regional plan. The draft Yorke Peninsula and Mid North Regional Plan identifies the emerging renewable energy sector as a key contributor to the region’s economic landscape.</i> <u>Recommendations</u> — NA	None required.
DHUD	<i>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.</i> <i>Various other SPPs are relevant including SPP 4 which seeks to maintain and enhance South Australia’s biodiversity and life supporting functions. The impact of the development on native vegetation and biodiversity will be considered under the Native Vegetation Act 1991 and EPBC Act 1999.</i> <u>Recommendations</u> — NA	None required. It can be noted that an application for native vegetation clearance for the Project was lodged with the NVC on 3 December 2025. Furthermore, the Significant Impact Assessment undertaken for the Project confirmed that the Project is not likely to impact any <i>Environment Protection and Biodiversity Act 1999</i> (EPBC Act) listed flora or fauna species, and as such, no referral under the EPBC Act is required for the Project (WSP Australia Pty Limited, 2025b).
DHUD	<i>The subject site is adjacent to the existing Snowtown substation. The EIR has considered the cumulative visual impacts of the development when considered alongside other existing or planned developments in the area.</i> <u>Recommendations</u> — NA	None required.
DHUD	<i>The existing allotment boundaries may conflict with the location of proposed infrastructure. It is queried whether the intent is to undertake a boundary realignment as part of the development. The Limited Land Division overlay applies which does not envisage the creation of allotments smaller than the Minimum Site Area applying to the land.</i> <u>Recommendations</u> — NA	Tilt Renewables confirms that no boundary realignment is proposed as part of this Project. The Project will be located across two land parcels: — Piece 101 of Deposited Plan 117950 of Certificate of Title (CT) 6210/929. This parcel is owned by a private landowner. A lease option has been secured across this parcel to facilitate the Project. — Allotment 100 of Deposited Plan 117950 of CT 6232/117. This parcel is owned by Snowtown Wind Farm Pty Ltd, a subsidiary of Tilt Renewables Australia Pty Ltd, and as such, no lease option deed is required.
PIRSA	<i>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 advise that the Department of Primary Industries and Regions have no comments to provide on the Environmental Impact Report and Statement of Environmental Objectives.</i>	None required.
OTR	<i>The Snowtown BESS received OTR certification on 13 May 2025, and the proposal appears consistent with the certificate issued.</i>	None required.
OTR	<i>The Snowtown BESS SEO does not mention (in section 4 Reporting) electric shock, electrical burns or prescribed fire reporting under the Electricity Act 1996 section 63 and Electricity (General) Regulations 2012 regulation 70.</i>	An additional section has been added to Section 4 of the SEO to address these additional reporting requirements: <i>‘4.6 Reporting to the Technical Regulator</i> <i>Any accident involving or associated with any electricity infrastructure, electrical installation or electrical equipment that results in electric shock, electrical burns or a prescribed fire is a notifiable incident under Section 63 of the Electricity Act 1996.</i> <i>As per Regulation 70 of the Electricity (General) Regulations 2012, a report must be made to the Technical Regulator of the following incidents:</i> — <i>in the case of a death resulting from the accident—immediately by telephone.</i> — <i>in the case of a person requiring medical assistance resulting from the accident—within 1 working day of the accident.</i>

Referral body	Comment raised by referral body	Steps (if any) taken or proposed to be taken by the licensee to address those comment
		— <i>in any other case—within 10 working days of the accident.</i> <i>The following parties are responsible for reporting of notifiable incidents under the Section 63 of the Electricity Act 1996:</i> — <i>if the accident involves part of an electricity entity's infrastructure—by the electricity entity</i> — <i>if the accident happens while an electrical worker is working on an electrical installation or equipment and the electrical worker is able to make the report—by the electrical worker</i> — <i>in any other case—by the occupier of the place in which the accident happens’.</i>
OTR	<i>A SRMTMP approved under the Electricity Act is maintained by Tilt Renewables for the Snowtown 1 Windfarm so they should have no issue with meeting SRMTMP submission requirements for the new BESS.</i>	None required.
NVC	<i>The Data Report notes that the proposed clearance is Seriously at variance with Principle of clearance 1(b) of the NV Act. Under the NV Act, the Council must not make a decision that is seriously at variance with those principles unless the SEB is deemed suitable to outweigh the value of retaining the vegetation and/or the provided moderating factors sufficiently minimise risk. The proponent notes the lack of suitable or important habitat for Southern Whiteface, Pygmy Blue-tongue Lizard, and Yellow-tailed Black Cockatoo.</i>	Tilt Renewables acknowledges that the proposed clearance is Seriously at variance with Principle or clearance 1(b). The Native Vegetation Clearance Data Report for the Project (WSP Australia Pty Limited, 2025a) (see Appendix C of the EIR) provides the following moderating factors to be considered by the NVC: — The proposed clearance area contains no suitable habitat for Pygmy Blue-tongue Lizard, and is considered non-essential habitat — Native vegetation exists in the broader area for common species occurring in the Project Area, and the area clearance is not considered essential habitat to maintain local populations of these species. — The habitat under application is not considered important or critical habitat for any of the listed threatened or migratory species which have been assessed as potentially occurring within the Project Area. The clearance will have a negligible impact on fauna species local populations over the long term (i.e. next 20 to 50 years).
NVC	<i>When submitting applications for clearance under the Native Vegetation Regulations 2017, the proponents must have regard to, and give effect to, the mitigation hierarchy. Details regarding the mitigation hierarchy are outlined in the Department for Environment and Water’s ‘Mitigation Hierarchy’ page1. The EIR and Ecological Assessment contain some information about the proponent’s intent to ‘avoid’ and ‘minimise’ clearance where possible. Notable project measures include:</i> — <i>Selecting a project site within previously cleared land,</i> — <i>Situating the proposed BESS in close proximity to the substation, thereby avoiding the potential for additional clearance to facilitate connection,</i> — <i>Avoiding the clearance of intact vegetation and habitats, including observed Maireana rohrlachii (Rorhach’s Bluebush), Acacia pycnantha over exotic herbs and grasses, and woodlands with tall trees or dense tree cover</i> — <i>Micro-siting primary access points to avoid and/or minimise impacts on remnant native vegetation, where possible,</i> — <i>Rehabilitating the site by removing Declared weeds under the Landscape South Australia Act 2019, and,</i> — <i>Offsetting clearance via a payment into the Native Vegetation Fund.</i>	Tilt Renewables confirms that these measures were included in the application for native vegetation clearance for the Project that was lodged with the NVC on 3 December 2025.
NVC	<i>The Council appreciates the proponent’s efforts to avoid impacts to higher quality vegetation in proximity to the Project Area, including Acacia pycnantha over exotic herbs and grasses and the Maireana rohrlachii (Rohrlach’s Bluebush) located within the vicinity of Hewitt Road. As previously noted, the Council strongly encourages that, where possible, the project design avoids the clearance of vegetation that is growing or is situated on land comprising a road reserve, as it is considered to be of significant ecological value, often containing threatened plant species and vegetation communities that may provide habitat for native wildlife.</i>	The significant ecological value of roadside vegetation is acknowledged. The native vegetation clearance presented in that EIR is a worst-case scenario. Further investigative works will be undertaken as part of the detailed design process to determine the best location for site access points, to further reduce impacts to native vegetation, where possible. In addition, these investigative works will also consider the topography and geology of the area, as well as vertical clearance to existing transmission lines. Further measures to minimise impacts to native vegetation in the road reserve will include: — clearly delineating the area to be cleared — undertaking vegetation condition and dust deposition monitoring during construction and decommissioning — implementing weed and biosecurity monitoring and control measures.

Referral body	Comment raised by referral body	Steps (if any) taken or proposed to be taken by the licensee to address those comment
Wakefield Regional Council	<i>Council noted the following considerations relating to the Traffic Impact Assessment.</i> It is expected that the construction traffic will access the site via either of the two routes below: — — Traffic generated from the south (general deliveries, quarry materials, personnel): – Augusta Highway – Wokurna Road (east); — Traffic generated from the north (concrete supply): — Upper Yorke Road – Wokurna Road (west). Wokurna Road is a locally maintained road, extending approximately 23.5 km between Upper Yorke Road and the Augusta Highway and passing immediately adjacent to the Project Area by the junction with Hewitt Road about 8 km west of the August Highway. It is suggested that prior to the commencement of construction activities along Workurna Road, Tilt Renewables, through its delivery contractor, should arrange conditions surveys to be undertaken along the key access roads that may be used during the Project. This will provide a basis for restoring any Project related damage upon completion, if required. — The construction contractor should ensure that the roads are maintained in an appropriate condition to provide safe movement along them. This will include routine maintenance to clear roads and junctions of loose material, repairing potholes and sections of worn payment, ad-hoc maintenance to restore pavements following inclement weather. This includes dust suppression during dry periods. <i>Council have concerns with the projected increase of traffic (30 – 60%) on Wokurna Road during the construction phase, particularly heavy vehicles and the potential impact on the unsealed surface reducing the expected life and potential bringing forward future renewal. Council supports the above suggestions and therefore request that Tilt Renewables provide conditions surveys of Wokurna road during the construction phase and that Tilt Renewables provide a written agreement to ensure that the Wokurna Road is maintained and repaired where necessary.</i>	The following assessment criteria for impact event T1 and Environmental Objective 8 has been updated to specify that conditions surveys for Wokurna Road will be provided to the Wakefield Regional Council: — <i>‘Prior to the commencement of construction activities along Wokurna Road, Tilt Renewables, through its delivery contractor, will arrange condition surveys to be undertaken along the key access roads that may be used during the Project. <u>Any condition surveys for Wokurna Road are to be provided to the Wakefield Regional Council.</u> Ongoing monitoring of the road pavement condition will be undertaken along the Project transport routes, with maintenance undertaken as required to remediate any Project-related impacts’.</i> An additional leading performance criteria has been added to impact event T1 and Environmental Objective 8 to specify that Tilt Renewables will provide a written agreement to the Wakefield Regional Council confirming that they will maintain and repair any damage or degradation to Wokurna Road resulting from Project works. — <i>‘A record is to be kept of the written agreement between Tilt Renewables and the Wakefield Regional Council that Tilt Renewables will maintain and repair any damage or degradation to Wokurna Road resulting from Project works’.</i>
Wakefield Regional Council	<i>Council supports all other aspects of the construction and operation phase as detailed in the Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO).</i>	None required.

Further information

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