


Prepared for  
Potentia Energy  
ABN: 91 646 972 619

AECOM

# Emeroo BESS Environmental Impact Report

11-Jul-2025  
Emeroo BESS

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Solar Farm, Darling Point, Australia

# Emeroo BESS Environmental Impact Report

Client: Potentia Energy

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Prepared by

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## Quality Information

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## 1.0 Introduction

Emeroo BESS Pty Ltd (being a related entity of Potentia Energy) (formerly Enel Green Power Australia) is investigating the opportunity to develop a 225MW/900MWh Battery Energy Storage System (BESS) (the Project) at the Bungala Solar Farm.

Potentia Energy is seeking to obtain an Associated Infrastructure Licence (the Licence) for the Project under the *Hydrogen and Renewable Energy Act 2023* (HRE Act). An Associated Infrastructure Licence Application was lodged with the Department for Energy and Mining (DEM) on 1 October 2024.

To support the assessment of the Licence Application an Environmental Impact Report (EIR) (this report) is required to be prepared pursuant to Section 61 of the HRE Act and Regulation 32 of the *Hydrogen and Renewable Energy Regulations 2024* (HRE Regulations).

This EIR has been prepared in accordance with the above legislative requirements which includes the Environmental Impact Assessment Criteria which was Gazetted on 31 October 2024 and the following associated draft DEM guidance documents:

- *Environmental Impact Assessment Criteria Guideline, HRE Act July 2024*
- *Environmental Impact Assessment Criteria: Requirement under Part 4 of the HRE Act. July 2024*

### 1.1 Project Background

The Bungala Solar Farm was approved in 2016 under the former *Development Act 1993* (Development Application Number 010/V031/16) and comprised of a 300MW solar farm and associated infrastructure. The approved solar farm comprised three stages.

Stages 1 and 2 have been developed and are operational with a total connection capacity of 220Mwac.

Since the original approval, a number of variations to the Development Approval were obtained for the Project, one of which included the addition of a BESS. In 2021 an approval for a 40MW/40MWh BESS was obtained, however, proceeding with this BESS option is not feasible, and thus, Potentia Energy is proposing the development of a significantly larger BESS – this Project, which is named the Emeroo BESS.

Due to changes in legislation a Licence under the HRE Act is now required for the Project, noting that the previous Development Approval recognised the suitability of the site for a BESS, albeit of smaller scale.

The Project has been strategically located within the Bungala Solar Farm adjacent to the ElectraNet Emeroo Substation, thereby allowing the development to connect directly and efficiently into the grid whilst also minimising the environmental impact of the Project given the previously developed nature of the site and its remote setting.

## 2.0 About Potentia Energy

On 9 December 2024 Enel Green Power Australia was rebranded as Potentia Energy.

Potentia Energy is a joint venture company co-owned by Enel Green Power and Inpex Corporation.

Enel Green Power (EGP), within the Enel Group, develops and operates renewable energy plants worldwide and is present in Europe, the Americas, Africa, Asia and Oceania. A world leader in clean energy, with a total capacity of around 64 GW and a generation mix that includes wind, solar, geothermal, and hydroelectric power, as well as energy storage facilities, Enel Green Power is at the forefront of integrating innovative technologies into renewable energy plants.

Inpex Corporation is Japan's largest exploration and production (E&P) company and is currently involved in projects across multiple continents, including the Ichthys LNG project in Australia (as the Operator). By thoroughly making its oil and gas business cleaner while expanding its five net zero business areas, Inpex aims to provide a stable supply of diverse and clean energy sources including oil, natural gas, hydrogen, ammonia, and renewables as a pioneer in energy transformation.

In Australia, Potentia Energy currently operates three (3) renewable energy plants totalling 310 MW of installed capacity powered by solar. Potentia Energy currently has a 76 MW wind project in final stages of commissioning in Western Australia and a 93 MW solar project, in commissioning stage, in Victoria. Additionally, Potentia Energy has a significant portfolio of wind, solar, storage and hybrid projects under development across Australia, including two multi-gigawatt renewables projects in Queensland, alongside expanding its activities in innovative solutions within its retail and trading operations.

## 3.0 Project Site and Locality

### 3.1 Project Site

The Bungala Solar Farm is located approximately 10 kilometres to the north-east of Port Augusta.

The existing solar farm is divided into two sections, with the Bungala One Solar Farm (B1) located in the southern portion of the site and the Bungala Two Solar Farm (B2) located in the north portion. The two solar farms are separated by a central access road.

The Project site is located within the boundary of the solar farms, on existing cleared land adjacent to the site entrance.

The BESS is to be sited within the north-eastern corner of B1 and will connect to the ElectraNet Emeroo Substation, which is located to the north within the south-eastern corner of B2.

The BESS site is approximately 7.65 hectares in area and is located on land formally identified as:

- Allotment 100 in Filed Plan 163829, contained within Certificate of Title Volume 5313 Folio 872

The Emeroo Substation is located on the following adjoining parcel of land:

- Allotment 99 in Filed Plan 163829, contained within the Certificate of Title Volume 5313 Folio 872

The Bungala Aboriginal Corporation owns both allotments. Potentia Energy has executed an Access Licence and Call Option to Lease Land Agreement with Bungala Aboriginal Corporation to enable the development of the BESS.

Copies of the Certificates of Title are provided in Appendix A.

The Bungala Solar Farm is located within the Nukunu (Area 2) Native Title Determination area.

### 3.2 Locality

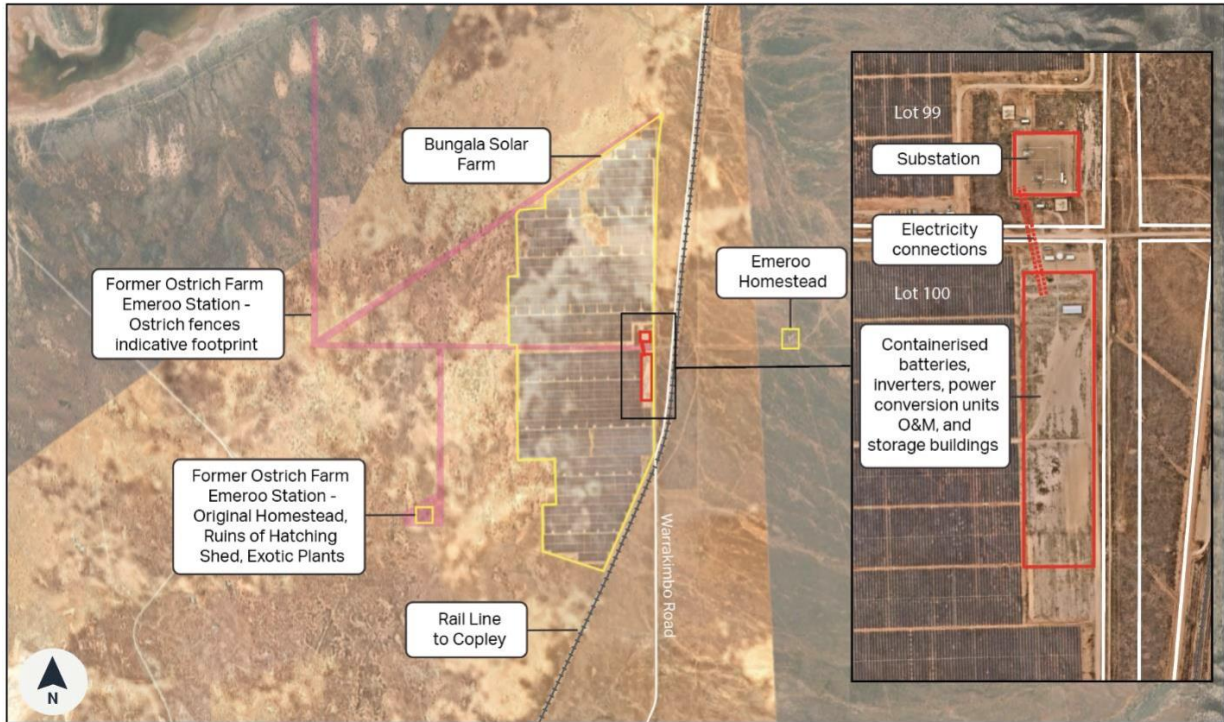
Land within the locality is extensively covered with native vegetation, with some areas used for low intensity grazing. There are only three dwellings located within a seven (7) kilometres radius of the proposed BESS site, with the nearest dwelling (being the Emeroo Homestead) located approximately 1.5 kilometres to the east of the BESS site.

Other key features within the extended locality include:

- Warrakimbo Road – approximately 150 metres to the east
- The disused Copley rail line – approximately 180 metres to the east
- The State heritage listed Ostrich Farm Ruins “Emeroo Station” – approximately 2.7 kilometres to the south-west (see Section 7.2.4)
- Port Augusta – approximately 10 kilometres to the south-west

The Project site and locality are further illustrated in Figures 1 to 3 on the following pages.

Figure 1 Project Site and Locality



Source: AECOM 2024

Figure 2 Project Site – View to the North



**Figure 3 Project Site – View to the South**

### 3.3 Consultation

Potentia Energy has conducted targeted engagement with relevant stakeholders (including relevant statutory stakeholders) regarding the proposed new battery storage system at the Bungala Solar Farm in accordance with legislative requirements.

A Consultation Report has been prepared in accordance with Regulation 33(4) of the HRE Regulation, which details:

- The persons consulted; and
- Any issues of concern raised by person consulted; and
- The steps (if any) taken or proposed to be taken by the licensee to address those concerns

A copy of the Consultation Report is provided in Appendix B.

The Project specific issues raised by stakeholders have been considered and addressed in the EIR (Section 7.0).

The Department for Energy and Mining released the EIR and Statement of Environmental Objectives for public consultation and prescribed body referral, pursuant to Sections 72 and 73 respectively of the HRE Act. In response to this consultation, submissions were received from the following agencies:

- Aboriginal Affairs and Reconciliation – Attorney-General's Department
- Department of Primary Industries and Regions
- South Australian Country Fire Service
- Department for Environment and Water
- Planning and Land Use Services – Department for Housing and Urban Development
- South Australian Arid Lands Landscape Board

In response to agency comments, a number of updates have been made to the EIR and the associated objectives within the Statement of Environmental Objectives, relating to:

- The requirement to prepare a Bushfire Management Plan and an Emergency Management Plan
- The addition of potential weed and pest impacts and management objectives.

A summary of the agency submissions, and the associated responses, is provided in Appendix C.

## 4.0 Proposed Development

### 4.1 Project Description

The proposed development comprises a 225MW/900MWh BESS to be located at the Bungala Solar Farm.

The BESS will comprise:

- Containerised batteries, inverters and power conversion units
- Switchroom and harmonic filter
- O&M and storage buildings
- Electricity connections to the existing ElectraNet Emeroo Substation, including switchyard upgrades/additional infrastructure within the existing substation
- Associated fencing, access and site works

An indicative layout is provided in Figure 4. The final layout will be subject to detailed design considerations.

A preliminary scaled site plan for the development is included in Appendix D

The proposed development also includes the decommissioning of the BESS and rehabilitation of the site, noting the Project has a design life of 25 years.

Figure 4 Proposed BESS Layout



## 4.2 Construction and Operation Details

The proposed development will be constructed over an approximate 18-month period, with construction proposed to commence in Q2 2026. It is anticipated that the construction activities will include:

- Site mobilisation
- Site preparation (clearing, benching/filling, fencing, access, establishment of laydown areas etc)
- Civil and stormwater works
- Construction of infrastructure and buildings
- Testing and commissioning

Employee numbers on the site during the construction phase will vary depending on the stage of works. However, it is estimated that up to 120 workers will be required at the peak of construction.

The operation of the facility will be limited to maintenance, operational, monitoring and associated administrative activities. It is estimated that up between 10 and 15 workers will be required for the operation of the facility.

The BESS will be a 24-hour facility. Not all staff will be required on site, with administrative functions potentially being undertaken externally.

It is anticipated that general maintenance and administrative staff will primarily be at the site during daylight hours (7am-7pm), after hours work for these activities may occur intermittently when required.

## 4.3 Management Plans

To ensure potential environmental impacts are appropriately managed during the construction and operational phases of the development, a Construction Environmental Management Plan (CEMP), Operational Environmental Management Plan (OEMP) and Decommissioning and Rehabilitation Plan will be prepared and implemented.

These plans will form part of Operational Management Plan required to be prepared pursuant to Section of 66 the HRE Act.

The CEMP will include a range of control measures to manage and minimise environmental risks during the construction phase of the project. The control measures will be specific to the site and will principally relate to the following key aspects:

- Air Quality
- Bushfire
- Cultural Heritage
- Noise
- Stormwater and Water Quality
- Traffic
- Waste Management

A specific OEMP will be prepared for the project which will describe measures to prevent or minimise environmental harm and mitigate impacts on the community. It will incorporate procedures, controls, monitoring and reporting requirements in relation to:

- Noise and vibration
- Fire risk
- Waste and pollution management
- Emergency response planning

- Complaints management

The Decommissioning and Rehabilitation Plan will guide how the infrastructure and equipment will be decommissioned and the site rehabilitated at the end of the Project life.

## 5.0 Legislative Requirements

The construction and operation of the Emeroo BESS requires an Associate Infrastructure Licence to be obtained under the HRE Act.

To inform the Licence application assessment and approval process Section 61 of the HRE Act requires an EIR to be prepared in respect of a proposed authorised operation (activity undertaken under licence).

Pursuant to Section 61(2) of the HRE Act an EIR must:

- (a) *take into account the environment, cultural and other values as those matters are relevant to the assessment; and*
- (b) *take into account risks inherent in the authorised operations to the health and safety of the public; and*
- (c) *contain sufficient information to make possible an informed assessment of the likely impact of the authorised operations on the environment; and*
- (d) *include an assessment of the environmental impact of authorised operations to which the report applies against the environmental impact assessment criteria; and*
- (e) *be prepared in accordance with the requirements of the regulations.*

The Environment Impact Assessment Criteria reference in Section 61(2)(d) was recently Gazetted on 31 October 2024, pursuant to Section 60(1) of the HRE Act. The Environment Impact Assessment Criteria requires an assessment of the following key elements:

- Elements of the Environment
- Potential Impact Events
- Confirmation of Impact Events
- Control and Management Strategies and Uncertainty Assessment
- Environmental Significance Assessment
- Statement of Environmental Objectives

With regard to Section 61(2)(e), the EIR must be prepared in accordance with the requirements of Regulation 32 of the HRE Regulations. Specially, Regulation 32(2) requires the EIR to contain the following information:

- (a) *a description of the authorised operations to be undertaken and the location at which the operations are to be undertaken;*
- (b) *a description of the specific elements of the environment that can reasonably be expected to be affected by authorised operations, with particular reference to the environment and existing land uses;*
- (c) *data relating to biodiversity within the area of land to which the report relates that can reasonably be expected to be affected by authorised operations;*
- (d) *an assessment of the cultural and heritage values of Aboriginal and Torres Strait Islander persons and other persons within the area of land to which the report relates that can reasonably be expected to be affected by authorised operations, and the public health and safety risks inherent in undertaking those operations (insofar as these matters are relevant in the particular circumstances);*
- (e) *if relevant and required by the Minister—an assessment of the continuity of supply with respect to hydrogen;*

- (f) *information on consultation that has occurred in accordance with the approved consultation plan, including specific details about relevant issues that have been raised and any response to those issues (but not including confidential information).*

## 6.0 Methodology

The EIR methodology has been developed in accordance with the relevant HRE Act requirements, including the Environmental Impact Assessment Criteria and the following associated draft DEM EIR guidance documents:

- *Environmental Impact Assessment Criteria Guideline, HRE Act July 2024*
- *Environmental Impact Assessment Criteria: Requirement under Part 4 of the HRE Act. July 2023*

Consideration has also been given to the Principles of Environmental Assessment Best Practice guidance document prepared by the International Association for Impact Assessment to provide widely agreed guidance on the principles and best practice in environmental impact assessment.

### 6.1 Screening

The purpose of a screening step in the environmental impact assessment process is to determine whether or not a proposal should be subject to an environment impact assessment and, if so, at what level of detail.

The HRE Act and the Environmental Impact Assessment Criteria are not conclusive on the inclusion of a screening step. In accordance with Section 62(1) of the HRE Act, a licence cannot be granted unless a statement of environmental objectives (SEO) is in force. In accordance with Section 62(2) of the HRE Act, the SEO must address the matters contained in the EIR. This requirement indicates that there is no current approved method for screening authorised operations, with all projects being required to undertake an EIR.

### 6.2 Scoping - Desktop assessment of environmental elements

A desktop assessment of the environmental elements listed as a minimum requirement in the draft Environmental Impact Assessment Guideline (July 2024) was undertaken using publicly available data of the project site and surrounds. Relevant technical investigations undertaken to support the Bungala Solar Farm project were also used to inform the desktop assessment.

This desktop assessment was approached as a scoping step in accordance with the environmental impact assessment best practice guidelines (International Association for Impact Assessment, 2019). The purpose of performing a scoping step early in the environmental assessment process is to determine the impacts and issues that are likely to be important.

The outcomes of the desktop assessment have guided the assessment of the environmental elements potentially impacted (and not impacted) by the proposed development within Section 7.0.

### 6.3 Environmental Risk Assessment

An environmental risk assessment was undertaken to identify potential issues that could reasonably be expected to impact receptors. The risk assessment was undertaken based on the initial risk of the proposed action prior to any mitigating measures being applied.

The risk assessment takes into account both the likelihood and a consequence of potential environmental impact events. The likelihood and consequence descriptors were determined based on the draft Environmental Impact Assessment Criteria Guideline and is consistent with the principles of the AS/NZ ISO 31000:2009 (ISO 31000) Risk Management – Principles and Guidelines (Standards Australia, 2009).

Table 1 and Table 2 outline the likelihood and consequence definitions respectively. The risk matrix presented in Table 3 aligns the consequence and likelihood with either low, medium, high or very high risks.

The initial risk ratings were assessed in consideration of the existing environmental conditions and management controls at the site, and the proposed design as specified in 4.0.

For environmental elements where potential impacts are identified further assessment was undertaken.

**Table 1 Likelihood definitions for the environmental risk assessment**

Rating	Descriptors
<b>Almost certain</b>	Expected to occur in most circumstances
	Guide: is expected to occur multiple times within a year or incident is clearly imminent
<b>Likely</b>	Probably occur in most circumstances
	Guide: is expected to occur approximately once per year
<b>Possible</b>	Could occur at some time
	Guide: likely to occur approximately once every 5 years
<b>Unlikely</b>	Not expected to occur
	Guide: likely to occur approximately once every 5-10 years
<b>Rare</b>	Exceptional circumstances only
	Guide: likely to occur with less frequency than once every 10 years

**Table 2 Consequence definitions for the environmental risk assessment**

Rating	Descriptors
<b>Severe</b> Widespread, serious, permanent effect	Incident is reportable to the regulator, serious permanent/persistent and irreversible damage is caused to an area or asset outside of the immediate vicinity of the project. Incident causes significant public interest and media coverage.
<b>Major</b> Wider spread, moderate to long-term effect	Incident is reportable to the regulator and notable damage is caused to an area or asset from which it will take more than 10 years to recover with long-term evidence of the incident resulting. Or Incident is reportable to the regulator and public concern raised.
<b>Moderate</b> Localised, short-term to moderate effect	Moderate but repairable damage that will take up to 10 years to recover. Or Incident is reportable to the regulator.
<b>Minor</b> Localised, short-term effect	Minor damage to the environment or heritage asset or area that is immediately contained on site. It will take less than two years for the resource or asset to fully recover or it will only require minor repair. Or Disturbance to scarce or sensitive environmental or heritage resources.
<b>Insignificant</b> No impact or no lasting effect	Negligible damage that is contained on site. And The damage is fully recoverable with no permanent effects, taking less than six months to fully recover.

**Table 3 Environmental risk matrix**

	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Low	Medium	High	Very High	Very High
Likely	Low	Medium	High	High	Very High
Possible	Low	Medium	Medium	High	High
Unlikely	Low	Low	Medium	Medium	High
Rare	Low	Low	Low	Medium	Medium

## 6.4 Assessment of significance

All potential impact events were assessed for their significance. The significance assessment presented in Section 7.5 took into account the control and management strategies that were identified for each impact event in Section 7.4.

Significance was assessed based on the parameters required in the Environmental Impact Assessment Criteria. Table 4 outlines the criteria that were considered in the assessment of significance.

**Table 4 Criteria used to assess significance of potential impacts**

Criteria	Description
Avoidance	Yes – the potential impact can be avoided through the identified controls
	No – the potential impact cannot be avoided through the identified controls
Frequency	Constant – Impacts are present throughout the life of the project
	Regular – Impacts are experienced on a regular, on-going basis but are not constant
	Low – Impacts occur for only short periods
	Rare – Impacts not expected or only occur in exceptional circumstances
Duration	Permanent – Impacts to the environment are permanent and non-reversible
	Long term – Impact to the environment persist for a period of years but are reversible
	Short term – impacts of less than a year duration and are reversible
Extent	Localised – impacts are confined to the project site and immediate surrounds
	Regional – impacts are spread on a regional scale
Severity	High – Large degree of change from existing conditions
	Low – Minor degree of change from existing conditions
Cumulative effects	Yes – identified receptors are already impacted by similar activities
	No – identified receptors are not already impacted by similar activities
Sensitivity of receiving environment	Low – small number of receptors identified, or, significance of receptor is low
	High – large number of receptors identified, or, receptors have been identified as protected under specific legislation

## 7.0 Environmental Impact Assessment

### 7.1 Screening

As the proposed project is to construct and operate a BESS facility of more than 5MW capacity, assessment and approval under the HRE Act, including the preparation of an EIR is required.

The Environmental Impact Assessment Criteria Guideline (the HRE Act Guidelines) published in October 2024 (DEM, 2024) talks to the adoption of a risk-based approach, wherein the level of detail of the assessment should be commensurate to the potential impacts and the management of anticipated impacts should be prioritised.

The level of assessment for this project reflects the low risk of significant environmental impacts from the proposed activities that has been identified.

### 7.2 Scoping - Desktop assessment of environmental elements

This section provides a description of the environment through the lens of the different elements of the environment as specified as a minimum to address in the HRE Act Guidelines published in October 2024 (DEM, 2024). Using publicly available data and relevant technical investigations undertaken to support the Bungala Solar Farm project, each element was assessed to determine a baseline of current conditions and assess whether or not it would be reasonably expected to be affected by the proposed activities.

In accordance with the Guidelines the concerns of external stakeholders have been considered in the impact assessment. As detailed in Consultation Report, the proponent has been engaged with local and regulatory stakeholders since 2017 in relation to the existing Bungala Solar Farm. In stakeholder meetings held to address the BESS proposal, three issues were raised as of concern:

- Traffic and associated dust management,
- Employment, and
- Community development.

The management of traffic and dust was raised in relation to past construction activities for Bungala Solar Farm.

For each environmental element that was found to be reasonably expected to be affected; all potential environmental receptors are identified, and relevant legislated or recognised standards are identified (see Section 7.2.16)

Based on this preliminary investigation, potential impact events are identified for further assessment in Section 7.3.

#### 7.2.1 Biophysical Environment

The Project Area is located within the Southern Flinders IBRA subregion of the Flinders Lofty Block IBRA region. The Flinders Lofty Block region covers 57,930 km<sup>2</sup>, and is characterised by chenopod shrublands, samphire shrublands and forbland. The land in the north of the bioregion, where the Project is located, is mainly used for agricultural grazing and nature conservation. The climate varies from north to south with the northern section of the bioregion having a semi-arid and arid climate with hot dry summers and cool mild winters. (Government of South Australia, Undated).

The footprint of the project is small in relation to the extent of the Bioregion with no clearing of vegetation or earthworks in previously undisturbed areas being proposed. The project will not have a solid, liquid, or gaseous discharge to the surrounding biophysical environment. Furthermore, the project is not expected to impact on any aqueous environments as there will be no interaction with any surface or groundwater environments.

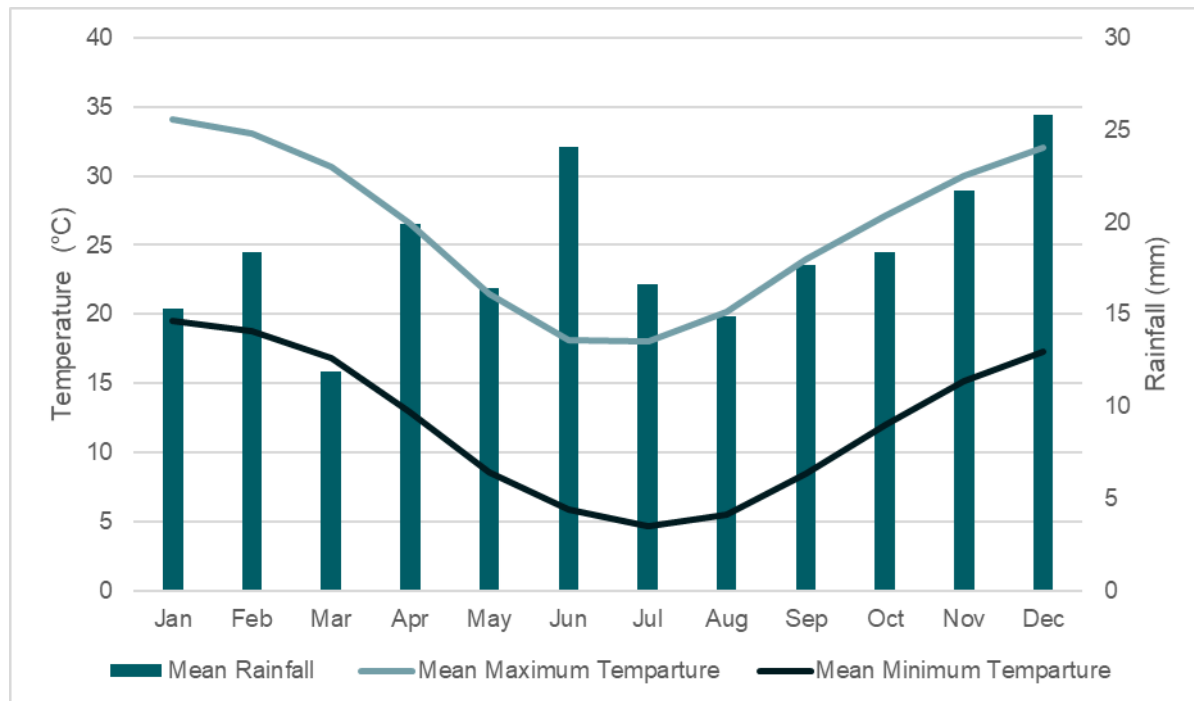
**Summary**

No potential environmental impact events have been identified. No potential receptor has been identified.

This element of the environment is **not reasonably expected to be impacted** by the proposed activities.

**7.2.2 Climate**

The Port Augusta Aero weather station (Station Number: 018201) is located approximately 16 km southwest of the Project Area and has records for rainfall and temperature available between 2001 and 2024 (BOM 2024). Records show the area has a mean average annual rainfall of 220.7 mm, a mean maximum temperature of 34.1 (January) and a mean minimum temperature of 4.7 (July) (BOM 2024). See Figure 5 for average monthly rainfall and temperatures for the Port Augusta Aero weather station.



**Figure 5 Average monthly temperatures and rainfall at Port Augusta Aero weather station between 2001 and 2004 (Station Number: 018201) (BOM 2024)**

Climate change projections for the area show that the South Australian Arid Lands region will, under a medium emissions scenario (RCP 4.5) experience a hotter, drier climate in the coming decades. Annual average maximum daily temperatures are projected to rise by 1.8°C by 2040. Average annual rainfall is expected to decrease by 9% by 2040, with average annual summer rainfalls increasing by 6% while autumn, winter and spring average rainfalls are projected to decrease by 14%, 18% and 16% respectively. (DEW, 2024)

The project proposes to establish a battery storage facility that will provide an opportunity to “firm” renewable energy that is produced in the system by providing storage during capacity during periods of peak production and releasing back to the network in times of peak demand. By providing a method of storage, the need for baseline energy production through the burning of fossil fuels is avoided.

**Summary**

The project is assessed as having a **positive impact** on the climate. However, this impact will be global in nature and not necessarily reflected in the local climate of the Project Area.

### 7.2.3 Public health and safety

The site is located in a remote location and public access is restricted through controlled access and fencing. The site is accessible by a single access road, Warrakimbo Road which is estimated to accommodate a very low traffic volume given the limited development it services.

The nearest recreational areas are The Dutchmans Stern Conservation Park located approximately 8.5 km northeast of the Project Area and Mount Brown Conservation Park located approximately 15 km southeast of the Project Area. The northern-most suburb of Port Augusta, Davenport, is located approximately 8 km southwest of the Project Area.

The facility does not propose to have any direct emissions to air or water that have the potential to spread beyond the boundary of the site.

#### **Summary**

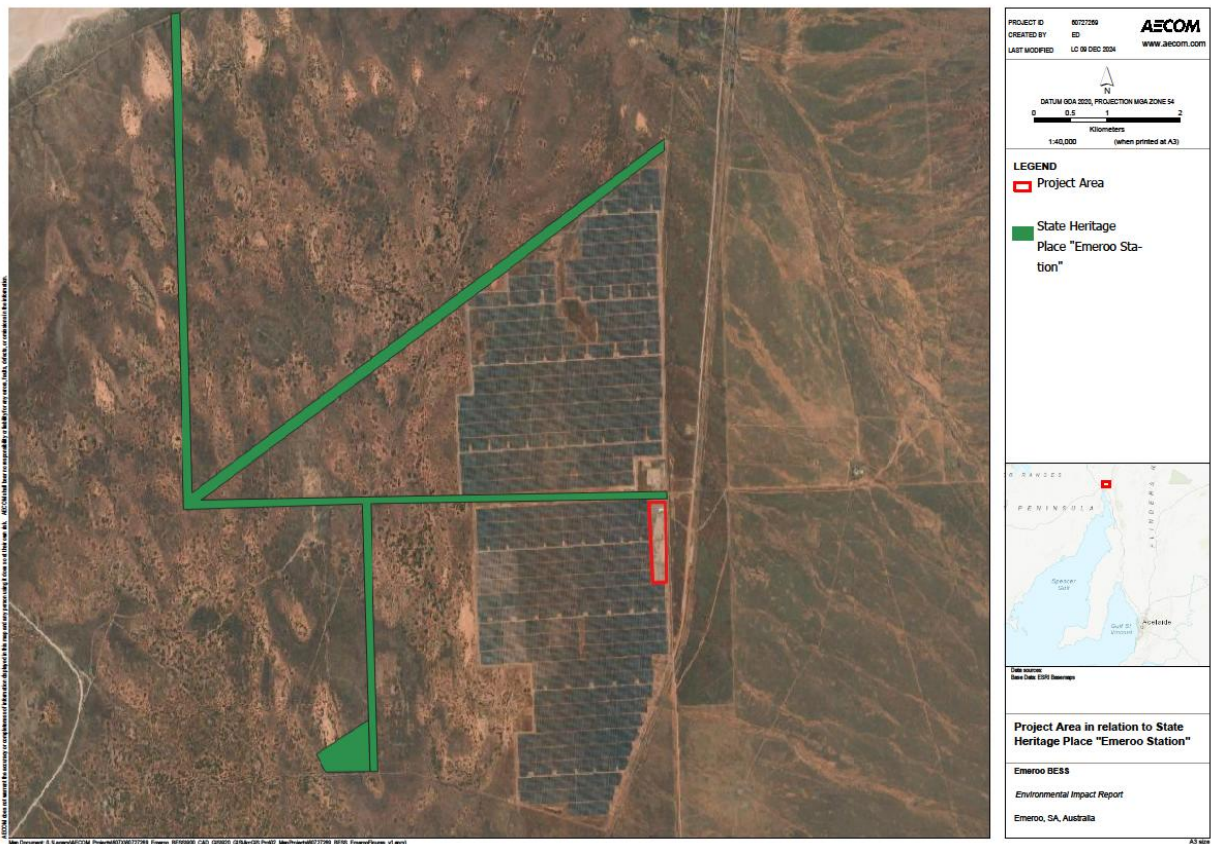
No potential environmental impact events have been identified. No potential receptor has been identified.

This element of the environment is **not reasonably expected to be impacted** by the proposed activities.

### 7.2.4 Heritage (Aboriginal and non-Aboriginal)

To inform the Development Application for the Bungala Solar Farm, within which the proposed BESS facility exists, heritage assessments including archaeological surveys were undertaken. These investigations identified both Aboriginal and Non-Aboriginal Heritage values within the Bungala Solar Farm site, meaning there is a high degree of certainty as to the presence of heritage values both within and adjacent to the Project Area.

The footprint of the State Heritage listed Former Ostrich Farm, Emeroo Station (State Heritage ID: 12702), extends through centre of the Bungala Solar Farm. The heritage values of the site include the Original Homestead, Ruins of Hatching Shed, Exotic Plants and Ostrich Fences. This footprint relates to the location of the Ostrich Fences. No fence elements remain adjacent to the site and therefore this State Heritage Place is unlikely to be impacted by the Project (see Figure 6).



**Figure 6 The location of the project showing proximity to the State Heritage Place “Emeroo Station”**

While the known heritage values of The Ostrich Farm are not present within the site of the proposed BESS facility, the risk remains that unknown heritage values associated with the State Heritage Place may be encountered during construction.

The project will require a presently unknown level of excavation across the site during the construction phase. As the heritage values of the site are well known, and the works are contained to previously disturbed soils, the risk of encountering unknown non-Aboriginal archaeological finds is considered low.

The Bungala Solar Farm has operated under an Aboriginal Heritage Management Plan since 2017. Stage 1 of the Bungala Solar Farm (which the BESS Project Area is situated within) were assessed as being of low to moderate archaeological sensitivity. Aboriginal stone artifacts identified at the site are of low archaeological significance, however they are of high cultural significance (Jacobs, 2017).

The risk remains that unregistered Aboriginal archaeological finds may be encountered during construction. This risk is mitigated through retaining all construction activities within areas of previously disturbed soils. The entire Project Area was previously disturbed during the construction of Stage 1 of the Bungala Solar Farm.

**Summary**

Damage or disturbance of unregistered Aboriginal heritage sites, objects and/or other places has been identified as a potential environmental impact event during the construction stage. The relevant receptor has been identified as Aboriginal heritage and communities. Damage or disturbance to the State Heritage Place has also been identified as a potential environmental impact event during the construction stage. The relevant receptor has been identified as non-Aboriginal heritage.

This element of the environment has the **potential to be impacted** by the proposed activities.

### 7.2.5 Soil

The project is proposed on an area of previously developed hardstand in an area that has a historical use as agricultural land. There is no historical land use that could indicate any soil contamination.

The operational phase does not include any solid, liquid or gaseous outputs that could pollute the soil.

Unplanned events such as spills that occur from failure of equipment are considered to be at a low risk of occurring. Should they occur, there is no pathway to affect soils due to the proposed design and management practises seeking to retain all stormwater on site, and the potential receptor is not considered to be sensitive.

#### Summary

No potential environmental impact events have been identified.

This element of the environment is **not reasonably expected to be impacted** by the proposed activities.

### 7.2.6 Groundwater quality and quantity

A review of active and historical bores within a 5km radius of the Project Area through the WaterConnect platform (Government of South Australia 2024) revealed that the ground water depth is variable and generally at a depth of between 30 m and 80 m below ground level. Total dissolved solids in the area are also high (>2000 mg/L) which suggests that the groundwater has limited potential for use. No active registered wells were identified within 5km downstream of the Project Area.

The proposed activities do not require the extraction of groundwater for either the construction, operation or decommissioning phase. The project will furthermore not lead to an increase in impermeable area. It is therefore not reasonable to expect that the project will have any impact on the quantity of groundwater.

The project does not have any solid, liquid or gaseous outputs that could affect the quality of groundwater. Unplanned events such as spills that occur from failure of equipment are considered to be at a low risk of occurring. Should they occur, there is no pathway to affect groundwater due to the proposed design and management practises seeking to retain all stormwater on site, as well as the considerable depth to the groundwater table. The potential receptor is not considered to be sensitive due to samples of groundwater in the area showing a low general groundwater quality, and no identified active uses from the same groundwater source.

#### Summary

No potential environmental impact events have been identified.

Groundwater quality and quantity are **not reasonably expected to be impacted** by the proposed activities.

### 7.2.7 Surface water and stormwater

A desktop assessment of the site using NatureMaps showed that there are no waterways present within the Project Area (see Figure 7). Watercourses in close proximity to the Project Area are Order One, ephemeral waterways that do not have permanent water. The proposed activities will, therefore, not divert or alter any water courses, disturb the bed or banks of any waterways.

The project does not involve any solid, liquid or gaseous outputs that have the potential to impact the quality of waterways.

The Project Area is not within a surface water catchment area, defined by the Department for Environment and Water as catchments from which surface runoff flows to the sea, a major waterbody, or a major river.

Unplanned events such as spills that occur from failure of equipment are considered to be at a low risk of occurring. Should they occur, there is no pathway to affect surface water due to the proposed design

and management practises seeking to retain all stormwater on site, and the potential receptor is not considered to be sensitive.

### Summary

No potential environmental impact events have been identified.

This element of the environment is **not reasonably expected to be impacted** by the proposed activities.

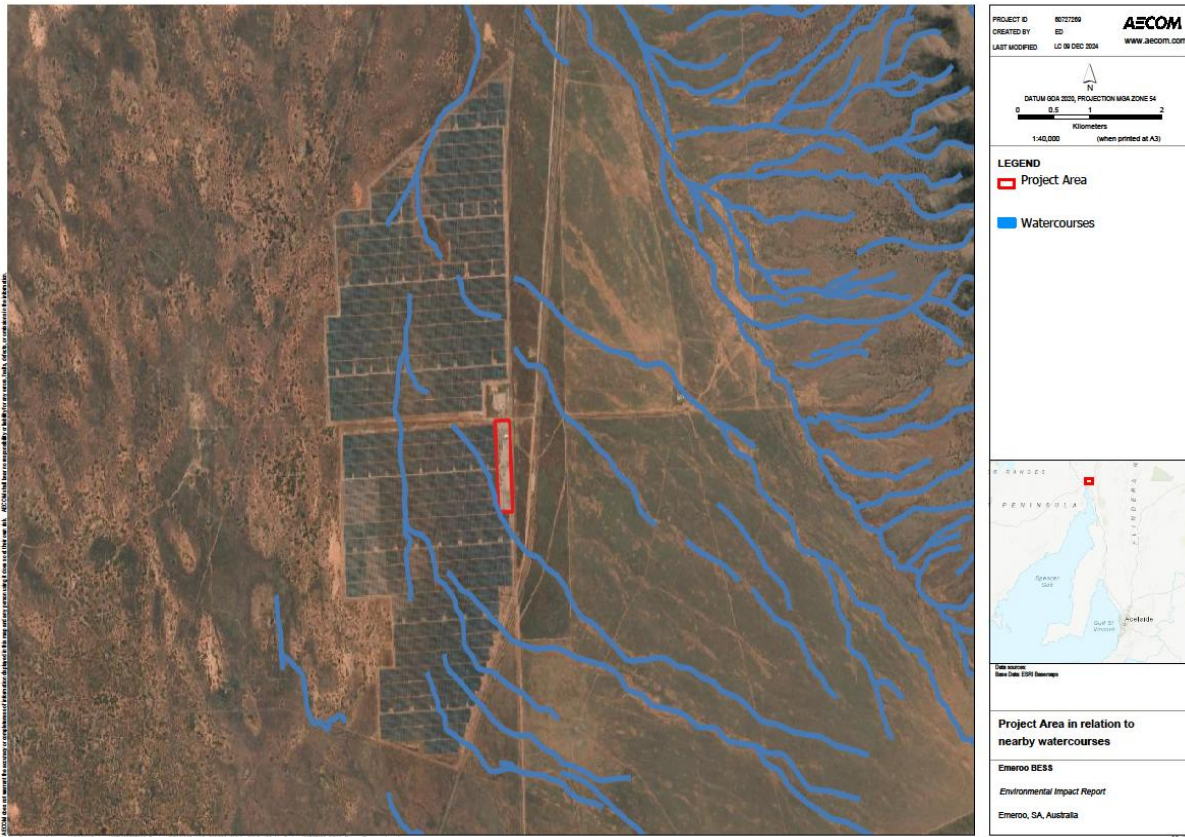


Figure 7 Watercourses in proximity to the Project Area

### 7.2.8 Noise and vibration

Battery facilities do emit noise, largely from the ancillary cooling fans that are required to regulate heat and avoid occurrence of fire. The noise profile of the site is expected to vary and not be constant with a higher noise profile during activation events (when energy is being actively stored and released). No vibratory impacts are expected during operation.

The construction phase will also produce noise and vibrations due to activities such as truck movements (including reverse signals), and excavation. Construction phase impacts are temporary and reversible.

The nearest sensitive receiver to the facility (Emeroo Homestead) is located approximately 1.5 km east of the proposed site. While it is understood that nobody currently resides at Emeroo Homestead, it has been identified as a potential receptor to noise impacts due to its potential to be used as both a residence and a workplace. Due to the distance from the site, vibration impacts are not expected.

While the distance to the nearest resident is large, the landscape is flat with no landforms between the proposed site and the identified receptor which would allow noise from the site to potentially travel great distances under optimal conditions.

Further assessment as part of the detailed design phase will be undertaken to ensure the Project's compliance with the relevant EPA Noise Policy requirements.

### **Summary**

Local residents being disturbed by noise from construction and operational activities has been identified as a potential environmental impact event during the construction and operational phases. The relevant receptor has been identified as potential local residents at Emeroo Homestead (currently not used as a residence).

This element of the environment has the **potential to be impacted** by the proposed activities.

#### **7.2.9 Air quality**

During construction, there are expected to be short-term air-quality impacts due to dust. Dust was raised as a concern by stakeholders with reference to dust issues that were experienced during construction of the Bungala Solar Farm.

Air quality impacts from construction activities for the BESS facility are considered to be of shorter duration and lower intensity than was experienced during construction of the Bungala Solar Farm. This is due to the smaller area of construction, as well as the site already having undergone development including clearing and levelling.

The proposed activity does not include any outputs during operation that could affect air quality.

Unplanned events such as the planned facility being impacted by fire (either originating within the facility itself or from bushfire) are considered to be at a low risk of occurring. Recent data has shown that global failure rates of grid-scale BESS facilities is 0.2 failures for each GW of BESS deployment (EPRI 2024). Should they occur, the number of sensitive receptors that have the potential to be impacted are considered to be low.

### **Summary**

Local residents being disturbed by dust from construction and transport activities has been identified as a potential environmental impact event during the construction phase. Decreased air quality due to fire that originates at the facility has also been identified as a potential environmental impact during the operation phase. The relevant receptor has been identified as potential local residents at Emeroo Homestead (currently not used as a residence).

This element of the environment has the **potential to be impacted** by the proposed activities.

#### **7.2.10 Existing land use and infrastructure**

The Project, being a battery energy storage facility, is captured within the definition of a 'renewable energy facility' as outlined in the Land Use Definitions Table in Part 7 of the South Australian Planning and Design Code (the Code).

The Project area is located within the Rural Zone (BESS site) and the Remote Areas Zone (Emeroo Substation). A renewable energy facility is a desired form of development within both Zones.

The project does not require any change in land use.

The Project Area is adjacent to both the existing Bungala Solar Farm (Stage 1 and Stage 2 as well as a potential future Stage 3).

Other adjacent land uses are agricultural, and it is not anticipated that the project will impact on these uses.

### **Summary**

The project is assessed as having a **positive impact** on the existing land use and infrastructure due to the colocation with the existing Renewable Energy infrastructure at Emeroo.

### 7.2.11 Native flora, fauna and sensitive ecosystems

The proposed construction and operation of the BESS is to occur within an area of previously disturbed and highly developed land that has previously been cleared of native vegetation as part of the approvals for the Bungala Solar Farm. This clearance was approved under the *Native Vegetation Act 1991* (NV Act). Any regrowth of vegetation at the site is permitted to be cleared under Regulation 8(9) of the NV Act, which allows clearance of regrowth within five years of the original clearance consent or within five years of subsequent clearance of regrowth.

A desktop ecology assessment was undertaken by AECOM in December 2024 to assess any potential impacts to flora, fauna and threatened ecological communities as a result of the proposed BESS facility (AECOM 2024). A review of relevant databases identified one Threatened Ecological Community, four state (provisional) threatened ecosystems, seven EPBC Act listed threatened flora species, one NPW Act listed threatened flora species, 18 EPBC Act listed threatened fauna, one NPW Act listed fauna species, and seven EPBC Act listed migratory species with potential to occur within 5 km of the Project Area.

A likelihood of occurrence assessment was undertaken for these communities, ecosystems and species, and concluded that all EPBC Act and NPW Act listed communities and threatened species are unlikely to occur within the Project Area due to the absence of any trees, vegetated areas or other suitable habitat .

The likelihood of occurrence assessment concluded that two bird species listed as migratory under the EPBC Act have the potential to overfly the Project Area, however as these species do not have appropriate habitat within the Project Area itself, they are considered highly unlikely to be impacted by the project.

Several weed and pest species are known to occur in the area, including Weeds of National Significance (WoNS) and Declared weeds under the LSA Act.

#### **Summary**

The movement of people, materials and vehicles during the construction and operation phases has the potential to introduce, spread, and/or attract weed and pest species at the site

This element of the environment has the **potential to be impacted** by the proposed activities.

### 7.2.12 Visual amenity

The proposed site is within an area currently occupied by a solar farm. The nearest residence, Emeroo Homestead, is located approximately 1.5 km from the site, and is currently understood to be uninhabited. Due to the distance, the existing view of the Bungala Solar Farm and the small scale of development relative to the existing solar farm, impacts to visual amenity are not reasonably expected to occur.

#### **Summary**

No potential environmental impact events have been identified.

This element of the environment is **not reasonably expected to be impacted** by the proposed activities.

### 7.2.13 Traffic

The site is serviced solely by Warrakimbo Road to its east, which is an unsealed local road. Warrakimbo Road currently accommodates low traffic volumes.

Consistent with the solar farm, the construction of the BESS will result in an increase of traffic movements along Warrakimbo Road and on the wider network.

Upgrades to Warrakimbo Road may be required to support construction activities. Also, appropriate management strategies may need to be implemented to support construction traffic without adverse impacts to the Warrakimbo Road, the wider network and the local community.

Once established, the traffic impacts of the BESS will be negligible and comparable to the low traffic volumes generated by the existing Solar Farm.

### **Summary**

Increased traffic during the construction phase has the potential to impact local road users.

This element of the environment has the **potential to be impacted** by the proposed activities.

### **7.2.14 Economic and/or social value**

Considering the nature of the BESS and its colocation within the existing Solar Farm, no adverse social impacts have been identified.

The Project capital costs are expected to be in the order of approximately \$550 million and will result in significant economic benefits to the State and local community through direct expenditure and employment during the construction and operation phases.

Further BESS projects of this scale assist to lower the cost of energy generation in the NEM and wholesale electricity prices in South Australia as they soak up the excess renewable energy at times of high generation and dispatch it during periods of lower renewable generation whilst also assisting to flatten the demand and supply curve for renewables.

### **Summary**

The project is assessed as having a **positive impact** on the local economy and broader economic and social impacts for electricity grid customers.

### **7.2.15 Summary of Scoping Study**

The following table summarises the results of the scoping study. Each of the elements of the environment that can reasonably be expected to be negatively impacted as a result of the proposed activities will be considered further in this EIR. Elements of the environment that cannot be reasonably expected to be affected by the proposed activities, or that are assessed as having a positive impact, are not considered further.

**Table 5 Elements of the environment that can be reasonably expected to be affected by the proposed activities.**

Element of the environment	Can the element of the environment be reasonably expected to be impacted by the project? (Y/N)	Is impact assessed and negative or positive?	If negative impact, is this impact assessed as significant based on the sensitivity of the environment? (Y/N)
Biophysical environment	N	N/A	N/A
Climate	Y	Positive	N/A
Public health and safety	N	N/A	N/A
Aboriginal and Non-Aboriginal Heritage	Y	Negative	N
Soil	N	N/A	N/A
Groundwater	N	N/A	N/A
Surface water	N	N/A	N/A

Element of the environment	Can the element of the environment be reasonably expected to be impacted by the project? (Y/N)	Is impact assessed and negative or positive?	If negative impact, is this impact assessed as significant based on the sensitivity of the environment? (Y/N)
Noise and Vibration	Y	Negative	N
Air quality	Y	Negative	N
Existing land use and infrastructure	Y	Positive	N/A
Native flora, fauna and sensitive ecosystems	Y	Negative	N
Visual amenity	N	N/A	N/A
Traffic	Y	Negative	N
Economic or social value	Y	Positive	N/A

### 7.2.16 Identification of potential receptors and applicable legislation

Table 6 identifies the potential receptors and application legislation and standards relating to the elements of the environment expected to be affected.

**Table 6 Environmental elements, views of affected parties, legislation, standards and receptors**

Environmental element	Views of affected parties	Applicable legislation	Applicable non-legislated standards	Environmental receptor
Aboriginal Heritage	Existing Cultural Heritage Management Plan in place at the site	<i>Aboriginal Heritage Act 1988</i> <i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Commonwealth)</i> <i>Native Title Act 1993 (Commonwealth)</i>	Cultural Heritage Management Plan for Bungala Solar Farm	Native title holders Local communities
Non-Aboriginal Heritage	Stakeholders identified concern that heritage elements of The Ostrich Farm may remain on the site	<i>Heritage Places Act 1993</i> <i>Planning, Development and Infrastructure Act 2016</i>	N/A	Non-Aboriginal heritage
Air Quality	Dust management during construction was identified by external stakeholders as a key concern	<i>Environment Protection Act 1993</i> <i>Environment Protection (Air Quality) Policy 2016</i>	N/A	Local residents and other road users adjacent to the site

Environmental element	Views of affected parties	Applicable legislation	Applicable non-legislated standards	Environmental receptor
Noise	N/A	<i>Planning, Development and Infrastructure Act 2016</i> <i>Local Nuisance and Litter Control Act 2016</i>	Environment Protection (Commercial and Industrial Noise) Policy 2023 Indicative noise factor guidelines for the Environment Protection (Commercial and Industrial Noise) Policy 2023	Local residents

### 7.3 Environmental Risk Assessment

Using the environmental risk assessment method detailed in Section 6.0, the elements of the environment that could reasonably be expected to be affected by the proposed activities in section 7.2.16 were assigned a risk rating. All potential impact events are further assessed in section 7.5.

Table 7 Environmental Impact Assessment

Environmental element	Phase of project	Impact ID	Potential impact event	Source	Pathway	Environmental receptor	Uncertainty and assumptions	Sensitivity to change	Confirmation of source – pathway – receptor	Risk rating
Aboriginal Heritage	Construction	AH1	Damage or disturbance of unregistered Aboriginal heritage sites, objects and/or other places	Earthworks	Soil disturbances	Aboriginal heritage and communities	The site has previously undergone Aboriginal Heritage surveys in collaboration with the Native Title holders. There is a high level of understanding of the heritage significance of the site. The design and construction methodology is not known and the level of excavation and depth of excavation is unknown.	Due to the high level of investigations at the site and previous earthworks, there is considered to be a low sensitivity to change. The site has an existing Heritage Management Plan that was developed in consultation with the Native Title holders.	Uncertain – While the source and the pathway is confirmed, the presence of a receptor is unconfirmed	Medium: Unlikely likelihood, Moderate consequence
Non-Aboriginal Heritage	Construction	NAH1	Impacts to unknown heritage elements of the State Heritage Place	Earthworks	Soil disturbances	Non-Aboriginal heritage	There are no known elements of the Ostrich Farm remaining on or adjacent to the site, as confirmed through site inspections, as the site has been previously cleared and developed.  The design and construction methodology is not known and the level of excavation and depth of excavation is unknown.	As there are no visible heritage elements of The Ostrich Farm remaining on or adjacent to the site, there is considered to be a low sensitivity to change.	Uncertain – While the source and pathway is confirmed, the presence of a receptor is unconfirmed	Medium: Unlikely likelihood, Moderate consequence
Air Quality	Construction	AQ1	Dust from construction activities and vehicle movements are a nuisance to local residents and other users of Warrakimbo Road	Earthworks at the site, vehicle movements on Warrakimbo Road	Wind	Potential local residents at Emeroo Homestead. It is understood that there is a currently nobody residing at	The number and type of vehicle movements per day is currently unknown. Severity of impacts is related to climatic conditions.	Severity of impacts is related to climatic conditions. Depending on construction methodology, number of truck	Source, pathway and receptor confirmed	Medium: Possible likelihood, Minor consequence

Environmental element	Phase of project	Impact ID	Potential impact event	Source	Pathway	Environmental receptor	Uncertainty and assumptions	Sensitivity to change	Confirmation of source – pathway - receptor	Risk rating
						Emeroo Homestead, however the property has the potential to be utilised as both a residence and a workplace.		movements can change.		
Air Quality	Operation	AQ2	Fire originating from the BESS facility	Failure of battery units	Fire spreading through burning of flammable materials	The BESS facility, neighbouring properties	Fire originating from BESS facilities are a rare occurrence due to a high level of controls. It is therefore uncertain that this impact will occur.	During the detailed design of the site, there is potential to reduce impacts through implementation of controls.	Uncertain – While the pathway and receptor are confirmed, the source is unconfirmed.	Medium Rare likelihood Major consequence
Traffic	Construction	T1	Increased traffic on local roads	Truck movements delivering components to site	Local roads	Users of local roads	The number and type of vehicle movements per day is currently unknown. The route that will be taken to site is also unknown.	Depending on construction methodology, number of truck movements can change.	Source, pathway and receptor confirmed	Low Unlikely likelihood, Minor consequence
Noise	Construction	N1	Local residents disturbed by noise due to construction activities	Movement of vehicles including reverse signals; Excavation, Pile driving	Acoustic waves through air	Potential local residents at Emeroo Homestead. It is understood that there is a currently nobody residing at Emeroo Homestead, however the property has the potential to be utilised as both a residence and a workplace.	The design and construction methodology has not yet been determined and therefore noise modelling has not been undertaken.	During the detailed design of the site, there is potential to reduce impacts through implementation of controls.	Uncertain – While the source has been confirmed, it is uncertain if the noise will reach any receptors	Medium: Possible likelihood, Minor consequence
	Operation	N2	Local residents disturbed by noise on an ongoing basis	Battery units; Cooling units	Acoustic waves through air	Potential local residents at Emeroo Homestead. It is understood that there is a currently nobody residing at Emeroo Homestead, however the property has the potential to be	The detailed design of the BESS is not yet finalised and therefore noise modelling has not been undertaken	During the detailed design of the site, there is potential to reduce impacts through implementation of controls. There is potential to implement physical controls such as noise walls at the site and potential to	Uncertain - While the source has been confirmed, it is uncertain if the noise will reach any receptors	High Possible likelihood, Moderate consequence

Environmental element	Phase of project	Impact ID	Potential impact event	Source	Pathway	Environmental receptor	Uncertainty and assumptions	Sensitivity to change	Confirmation of source – pathway - receptor	Risk rating
						utilised as both a residence and a workplace.		implement noise mitigations at the receptor.		
Native flora and fauna	Construction	FF1	Increased risk of weed and pest incursion	Movement of people, materials and vehicles	Movement of people, materials and vehicles	Receiving environment including native flora and fauna	The design and construction methodology is not known. Severity of impacts would be related to the effectiveness of management measures to be implemented.	As the site has been previously cleared and developed, there is considered to be low sensitivity to change.	Source, pathway and receptor confirmed	Medium: Possible likelihood, Minor consequence
	Operation	FF2	Increased risk of weed and pest incursion	Movement of people, materials and vehicles	Movement of people, materials and vehicles	Receiving environment including native flora and fauna	Severity of impacts would be related to the effectiveness of management measures to be implemented.	As the site has been previously cleared and developed, there is considered to be low sensitivity to change.	Source, pathway and receptor confirmed	Medium: Possible likelihood, Minor consequence

## 7.4 Control and Management Strategies

This section introduces the potential control measures that have been identified for any potential impact identified in section 7.2.16. Control measures identified in this section are based on mitigations that have been committed to as part of project design, standard management procedures and requirements under other legislation.

**Table 8 Control measures, environmental objectives and criteria**

Impact event ID	Control measures	Proposed environmental objective	Assessment criteria	Leading performance criteria
<b>Aboriginal Heritage</b>				
AH1	<ul style="list-style-type: none"> <li>Develop Heritage Management Plan</li> <li>Establish unexpected finds protocol</li> <li>Conduct heritage induction and regular training for all personnel</li> </ul> <p>Where damage is unavoidable:</p> <ul style="list-style-type: none"> <li>Authorisations under the <i>Aboriginal Heritage Act 1988</i> are sought</li> <li>Appropriate consultation with Aboriginal parties</li> <li>Employ Risk management approach (limited to avoiding and protecting the heritage).</li> </ul>	No damage, disturbance or interference to Aboriginal sites, objects or remains.	<p>Avoid damage, disturbance or interference to Aboriginal sites, objects or remains as required by the SA <i>Aboriginal Heritage Act 1988</i>.</p> <p>Where damage or interference to Aboriginal heritage is unavoidable then application for authorisation in accordance with section 23 of the <i>Aboriginal Heritage Act 1988</i> will be sought.</p> <p>Where unexpected heritage discoveries occur, discoveries are to be reported to Aboriginal Affairs &amp; Reconciliation Attorney-General's Department (AAR) as soon as reasonably practical in accordance with section 20 of the <i>Aboriginal Heritage Act 1988</i>.</p>	<p>Heritage Management Plan is adhered to and effective.</p> <p>All ground disturbance work will be undertaken in accordance with agreed Heritage Management Plan.</p> <p>Activities confined to existing cleared areas.</p> <p>Training and induction for all personnel to educate on the importance of heritage controls.</p> <p>Procedures, systems and plans in place if heritage values encountered.</p>

Impact event ID	Control measures	Proposed environmental objective	Assessment criteria	Leading performance criteria
			Discoveries of potential human remains must be reported to SAPOL immediately via 131 444.	
<b>Non-Aboriginal Heritage</b>				
NAH1	<ul style="list-style-type: none"> <li>Implement mitigation measures through CEMP</li> <li>Establish unexpected finds protocol</li> <li>Conduct heritage induction and regular training for all personnel</li> </ul> <p>Where damage is unavoidable:</p> <ul style="list-style-type: none"> <li>Adhere to the requirements of the <i>Heritage Places Act 1993</i> and <i>Planning, Development and Infrastructure Act 2016</i>.</li> <li>Employ Risk management approach (limited to avoiding and protecting the heritage).</li> </ul>	No impact to the State Heritage Place.	<p>Avoid any impact to the State Heritage Place as per the <i>Heritage Places Act 1993</i>.</p> <p>Where unexpected discoveries occur, adhere to the requirements of the <i>Heritage Places Act 1993</i> and <i>Planning and Development and Infrastructure Act 2016</i>.</p>	<p>CEMP is adhered to and effective.</p> <p>All ground disturbance work will be undertaken in accordance with CEMP measures.</p> <p>Activities confined to existing cleared areas.</p> <p>Training and induction for all personnel to educate on the importance of heritage controls.</p> <p>Procedures, systems and plans in place if heritage values encountered.</p>
<b>Air Quality</b>				
AQ1	<ul style="list-style-type: none"> <li>Establish Traffic Management Plan including controls for the number of truck movements per day</li> </ul>	No public nuisance impacts from dust as a result of construction activities	<p>No public nuisance impacts from dust as a result of construction activities.</p> <p>Procedures, controls, and reporting requirements in</p>	Traffic management plan developed in collaboration with local government and is adhered to.

Impact event ID	Control measures	Proposed environmental objective	Assessment criteria	Leading performance criteria
	<ul style="list-style-type: none"> <li>Implement dust suppression management measures such as watering of roads through CEMP</li> <li>Establish stakeholder complaints management procedure including documentation</li> <li>No unresolved reasonable complaints.</li> </ul>		<p>relation to air quality to be outlined in the CEMP.</p> <p>A Traffic Management Plan will be established to reduce air quality impacts associated with vehicle movements.</p>	<p>Dust suppression addressed in CEMP.</p> <p>Consultation with local residents on implementation of dust suppression.</p>
AQ2	<ul style="list-style-type: none"> <li>Ensure compliance with all relevant standards and requirements including the Fire and Emergency Service Act</li> <li>Conduct regular fire safety audits, document incident reports, and document compliance with regulations</li> <li>Appropriate fire-fighting equipment to be available on site and maintained, including dedicated firewater storage</li> <li>Employ weatherproof design elements to reduce the risk of water ingress and short-circuiting, with consideration of the challenges in</li> </ul>	<p>Fires originating at the BESS facility contained to the site. No adverse risk to public health and safety as a result of fire or smoke from BESS.</p>	<p>Compliance with fire management systems and procedures.</p> <p>Procedures, controls, monitoring, reporting and auditing requirements in relation to bushfire risk and control and ongoing operational fitness to be conducted in accordance with the approved CEMP and OEMP, including a Bushfire Management Plan and Emergency Management Plan</p>	<p>Comprehensive fire management plans included in the CEMP and OEMP are adhered to and effective.</p> <p>Auditing demonstrates compliance.</p>

Impact event ID	Control measures	Proposed environmental objective	Assessment criteria	Leading performance criteria
	extinguishing fires in affected racks <ul style="list-style-type: none"> <li>• Implement fire prevention procedures such as designated smoking areas, operational procedures, firebreaks and regular inspections of vegetation</li> <li>• Implement additional fire considerations for high fire danger days and periods of drought</li> <li>• Conduct regular fire safety and emergency response training for all personnel</li> <li>• Implement safety, testing, maintenance and inspection procedures for firefighting equipment</li> <li>• Obtain any necessary permits such as safe work permits</li> <li>• Regularly review and update fire safety and emergency response procedures</li> </ul>			
<b>Traffic</b>				
T1	<ul style="list-style-type: none"> <li>• Implement management procedures to reduce impacts through a Traffic Management Plan.</li> </ul>	No adverse impacts to local road uses during the construction phase.	A Traffic Management Plan will be established to implement traffic management strategies to	Traffic Management Plan developed in collaboration with local government and is adhered to.

Impact event ID	Control measures	Proposed environmental objective	Assessment criteria	Leading performance criteria
	<ul style="list-style-type: none"> <li>Establish stakeholder complaints management procedure including documentation</li> <li>No unresolved reasonable complaints.</li> </ul>		<p>reduce impacts associated with construction vehicle movements.</p> <p>Stakeholder complaints related to dust are documented and reasonable steps taken to resolve complaints can be demonstrated.</p>	
<b>Noise</b>				
N1	<ul style="list-style-type: none"> <li>Compliance with noise regulations and effective noise control measures as required</li> <li>Establish stakeholder complaints management procedure including documentation</li> <li>No unresolved reasonable complaints.</li> </ul>	No public nuisance impacts from noise as a result of construction activities	<p>No public nuisance impacts from noise as a result of construction activities.</p> <p>Procedures, controls, and reporting requirements in relation to construction noise to be outlined in the CEMP.</p> <p>Compliance with the SA EPA Environment Protection (Commercial and Industrial Noise) Policy 2023.</p> <p>Stakeholder complaints related to noise are documented and reasonable steps taken to resolve complaints can be demonstrated.</p>	<p>Construction noise management addressed in CEMP.</p> <p>Site activities planned and undertaken to minimise disturbance to local community.</p> <p>Infrastructure and equipment operated and maintained in accordance with manufacturer specifications.</p>

Impact event ID	Control measures	Proposed environmental objective	Assessment criteria	Leading performance criteria
N2	<ul style="list-style-type: none"> <li>• Compliance with noise regulations and effective noise control measures as required</li> <li>• Implement design features to reduce noise profile</li> <li>• Investigate implementation of noise reducing applications at the receptor</li> <li>• Establish stakeholder complaints management procedure including documentation</li> <li>• No unresolved reasonable complaints.</li> <li>• Demonstrate (through noise modelling) that noise levels do not exceed the indicative noise levels for Rural Zone as set out in Appendix 1 of the Indicative noise factor guidelines for the Environmental Protection (Commercial and Industrial Noise) Policy 2023: -57dB(A) during the day</li> </ul>	No public nuisance impacts from noise as a result of operation	<p>No public nuisance impacts from noise as a result of operation.</p> <p>Procedures, controls, monitoring, reporting and auditing requirements in relation to operational noise and ongoing operational fitness to be conducted in accordance with the approved OEMP.</p> <p>Compliance with the SA EPA Environment Protection (Commercial and Industrial Noise) Policy 2023.</p> <p>Demonstrate, through noise modelling, that noise levels do not exceed the indicative noise levels for Rural Zone as set out in Appendix 1 of the Indicative noise factor guidelines for the Environmental Protection (Commercial and Industrial Noise) Policy 2023: -57dB(A) during the day -49dB(A) during the night</p>	<p>Operational noise management addressed in OEMP.</p> <p>Site activities planned and undertaken to minimise disturbance to local community.</p> <p>Infrastructure and equipment operated and maintained in accordance with manufacturer specifications.</p> <p>Noise levels do not exceed indicative noise levels.</p>

Impact event ID	Control measures	Proposed environmental objective	Assessment criteria	Leading performance criteria
	-49dB(A) during the night.			
<b>Native flora and fauna</b>				
FF1	<ul style="list-style-type: none"> <li>Develop a Weed and Pest Management Plan including vehicle hygiene protocols and awareness training for project personnel</li> <li>Develop a Waste Management Plan</li> </ul>	No introduction or spread of weed and pest species. Existing weeds and pests on the site to be managed.	<p>Management of declared weeds should be in accordance with requirements of the LSA Act.</p> <p>A Waste Management Plan will form part of the CEMP, including measurements to prevent pest predator species from being attracted to the site or having access to waste.</p>	<p>Weed and pest management will be addressed in the CEMP and adhered to.</p> <p>Training for personnel on importance of weed and pest controls.</p>
FF2	<ul style="list-style-type: none"> <li>Develop a Weed and Pest Management Plan including vehicle hygiene protocols and awareness training for project personnel</li> <li>Develop a Waste Management Plan</li> </ul>	No introduction or spread of weed and pest species. Existing weeds and pests on the site to be managed.	<p>Management of declared weeds should be in accordance with requirements of the LSA Act.</p> <p>A Waste Management Plan will form part of the OEMP, including measurements to prevent pest predator species from being attracted to the site or having access to waste.</p>	<p>Weed and pest management will be addressed in the OEMP and adhered to.</p> <p>Training for personnel on importance of weed and pest controls.</p>

## 7.5 Environment Significance Assessment

This section assesses the significance of the residual environmental impact, taking into account the application of mitigation measures identified in section 7.4.

The assessment of significance takes into account the frequency, duration, extent and severity of residual impacts, as well as the sensitivity of the receiving environment and any cumulative impacts. See section 6.4 for a description of the criteria applied.

The assessment demonstrates that the potential impacts of proposed activities can be reduced to as low as reasonably practicable (ALARP) with standard management procedures and legislative requirements. No project specific mitigations have been identified as necessary.

**Table 9 Environmental significance assessment**

Impact ID	Avoidance	Frequency	Duration	Extent	Severity	Cumulative Effects	Sensitivity of receiving environment	Outcome
AH1	Unknown – based on uncertainty, the potential exists to encounter heritage values not previously identified during surveys	Rare – exceptional circumstances only	Permanent – damage to heritage values is permanent	Localised – impacts confined to project site	High – permanent loss of Aboriginal heritage	Yes – Entirety of the site has been previously disturbed during the development of the Bungala Solar Farm, and is mapped as an area of low to moderate archaeological sensitivity.	Low – Site has previously been surveyed to identify and record Aboriginal heritage values.	Potential impacts managed to ALARP by adoption of control measures through Heritage Management Plan
NAH1	Unknown – based on uncertainty, the potential exists to encounter	Rare – exceptional circumstances only	Permanent – damage to heritage values is permanent	Localised – impacts confined to project site	High – permanent loss of non-Aboriginal heritage	Yes – Entirety of the site has been previously disturbed during the	Low – there are no visible remaining elements of the State Heritage Place	Potential impacts managed to ALARP by adoption of control

Impact ID	Avoidance	Frequency	Duration	Extent	Severity	Cumulative Effects	Sensitivity of receiving environment	Outcome
	heritage values not previously identified during surveys					development of the Bungala Solar Farm.	on or adjacent to the site.	measures through CEMP.
AQ1	No – truck movements and excavation are required to construct the facility and cannot be avoided	Low – impacts only present during construction and likely to fluctuate based on construction activities and climatic conditions	Short term – impacts during construction. Immediately reversible on completion of construction.	Localised – impacts confined to project site and immediate surrounds.	Low – impacts are uncertain due to a lack of certainty around construction methodology. Due to the distance to the nearest receptor, it is unlikely that dust from construction activities would constitute a severe impact.	No	Low – the number of sensitive receptors is low.	Potential impacts managed to ALARP through the implementation of traffic management and dust suppression procedures.
AQ2	No – Fire remains a rare occurrence that cannot be avoided absolutely	Rare – exceptional circumstances only	Long term – Recovery from effects of fire can take several years	Localised – impacts confined to project site and immediate surrounds	Low – Impacts to air quality in the event of a fire would be short term and pollutants would quickly dissipate to safe levels.	No	Low – The number of sensitive receptors is low.	Potential impacts managed to ALARP by adoption of control measures

Impact ID	Avoidance	Frequency	Duration	Extent	Severity	Cumulative Effects	Sensitivity of receiving environment	Outcome
T1	No – increased traffic movements are required to construct the facility and cannot be avoided	Low – impacts only present during construction and likely to fluctuate based on construction activities	Short term – impacts during construction. Immediately reversible on completion of construction.	Localised – impacts confined to project site and immediate surrounding local road network.	Low – impacts are uncertain due to a lack of certainty around construction methodology. Due to the limited volumes of traffic the local road network accommodates, it is unlikely that construction traffic would constitute a severe impact.	No	Low – The number of sensitive receptors is low.	Potential impacts managed to ALARP by adoption of control measures through the implementation of a Traffic Management Plan.
N1	No -	Low – impacts only present during construction and likely to fluctuate based on construction activities and wind direction	Short term – impacts during construction. Immediately reversible on completion of construction.	Localised – impacts confined to project site and immediate surrounds.	Low – impacts are uncertain due to a lack of certainty around construction methodology. Due to the distance to the nearest receptor, it is unlikely that construction noise would	No	Low – the number of sensitive receptors is low.	Potential impacts managed to ALARP through the implementation of a CEMP.

Impact ID	Avoidance	Frequency	Duration	Extent	Severity	Cumulative Effects	Sensitivity of receiving environment	Outcome
					constitute a severe impact.			
N2	Yes – impacts can be avoided through implementation of mitigations. To be confirmed with noise modelling.	N/A	N/A	N/A	N/A	Yes – cumulative noise impacts from the existing solar farm should be considered.	Low – the number of potential receptors is low.	Potential impacts avoided through design with noise modelling to be undertaken to demonstrate that noise levels do not exceed the indicative noise levels for Rural Zone
FF1	Yes – impacts can be avoided through implementation of mitigations.	N/A	N/A	N/A	N/A	Yes – cumulative impacts from the existing solar farm should be considered.	Low – no sensitive flora, fauna or community values identified on this site.	Potential impacts managed to ALARP through the implementation of weed and pest management measures.
FF2	Yes – impacts can be avoided through implementation	N/A	N/A	N/A	N/A	Yes – cumulative impacts from the existing solar farm	Low – no sensitive flora, fauna or community values	Potential impacts managed to ALARP through the implementation

Impact ID	Avoidance	Frequency	Duration	Extent	Severity	Cumulative Effects	Sensitivity of receiving environment	Outcome
	n of mitigations.					should be considered.	identified on this site.	n of weed and pest management measures.

## 8.0 Conclusion

Potentia Energy propose to develop and operate the Emeroo BESS within the Bungala Solar Farm.

The EIR has been prepared in accordance with the relevant requirements of the HRE Act and HRE Regulations and DEM guidelines.

The EIR has identified that the Project will result minimal environmental impacts largely due to characteristics of the site and nature of the development and surrounding environment.

The identified potential impacts can be reduced to ALARP via standard environmental management practices and design measures to achieve legislative requirements. No project-specific mitigation measures have been identified as necessary.

The principal potential impact relates to noise which require further assessment and potential mitigation. It is considered possible that the indicative noise levels permitted for the Rural Zone can be achieved.

Further investigations are to occur during the detailed design stage with any necessary design and attenuation measure implemented prior to the operation of the facility. The measures and/or approach to confirm the facility's compliance with the relevant EPA Noise Policy will be addressed within the OEMP.

## 9.0 References

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# Appendix A

## Certificates of Title



The Registrar-General certifies that this Title Register Search displays the records maintained in the Register Book and other notations at the time of searching.



## Certificate of Title - Volume 5313 Folio 872

Parent Title(s)	CT 4360/722				
Creating Dealing(s)	TG 7944969				
Title Issued	13/12/1995	Edition	7	Edition Issued	16/08/2019

## Estate Type

FEE SIMPLE

## Registered Proprietor

BUNGALA ABORIGINAL CORPORATION  
OF 1 YOUNG STREET PORT AUGUSTA SA 5700

## Description of Land

ALLOTMENTS 91, 92 AND 93 FILED PLAN 163829  
IN THE AREA NAMED EMEROO  
HUNDREDS OF CROZIER AND DAVENPORT

ALLOTMENTS 94 AND 95 FILED PLAN 163829  
IN THE AREA NAMED WAMI KATA  
HUNDREDS OF CROZIER AND DAVENPORT

ALLOTMENTS 96, 97, 98 AND 99 FILED PLAN 163829  
IN THE AREA NAMED EMEROO  
HUNDREDS OF CROZIER AND DAVENPORT

ALLOTMENTS 100 AND 101 FILED PLAN 163829  
IN THE AREA NAMED WAMI KATA  
HUNDREDS OF CROZIER AND DAVENPORT

ALLOTMENT COMPRISING PIECES 102 AND 103 FILED PLAN 163829  
IN THE AREA NAMED WAMI KATA  
HUNDREDS OF CROZIER AND DAVENPORT

## Easements

SUBJECT TO EASEMENT(S) OVER THE LAND MARKED A FOR WATER SUPPLY PURPOSES TO THE MINISTER FOR INFRASTRUCTURE (TG 7944969)

## Schedule of Dealings

Dealing Number	Description
8334276	CAVEAT BY ABORIGINAL AND TORRES STRAIT ISLANDER COMMISSION
12714471	LEASE TO BUNGALA ONE PROPERTY PTY. LTD. (ACN: 614 425 651) COMMENCING ON 07/04/2017 AND EXPIRING ON 07/04/2047 OF PORTION (AREA BG1A AND AREA BG1B IN F252231)
12714472	MORTGAGE OF LEASE 12714471 TO NATIONAL AUSTRALIA BANK LTD. (ACN: 004 044 937)
12714494	LEASE TO ELECTRANET PTY. LTD. (ACN: 094 482 416) COMMENCING ON 07/04/2017 AND EXPIRING ON 28/02/2049 OF PORTION (SUBSTATION BG2B AND BUNGALA SOLAR ACCESS BG2B OF F252232)
12723115	UNDERLEASE OF LAND IN LEASE 12714471 TO BUNGALA ONE OPERATIONS PTY. LTD.

(ACN: 614 425 660) COMMENCING ON 07/04/2017 AND EXPIRING ON 06/04/2047

12773011	LEASE TO BUNGALA TWO PROPERTY PTY. LTD. (ACN: 615 612 756) COMMENCING ON 26/07/2017 AND EXPIRING ON 25/07/2047 OF PORTION (AREA BG2C AND BG2D IN F252285)
12773012	MORTGAGE OF LEASE 12773011 TO NATIONAL AUSTRALIA BANK LTD. (ACN: 004 044 937)
12773013	UNDERLEASE OF LAND IN LEASE 12773011 TO BUNGALA TWO OPERATIONS PTY. LTD. (ACN: 615 612 765) COMMENCING ON 26/07/2017 AND EXPIRING ON 24/07/2047
13888055	CAVEAT BY BUNGALA THREE PTY. LTD. (ACN: 619 211 602) OVER PORTION (BGN3 IN F252919)
13888056	CAVEAT BY BUNGALA THREE PTY. LTD. (ACN: 619 211 602) OVER PORTION (BGN1, BGN2 AND BGNX IN F252285)
13888057	CAVEAT BY BUNGALA SOLAR HOLDING PTY. LTD. (ACN: 614 424 529) OVER PORTION (BGN4 IN F252285)
14115732	PARTIAL WITHDRAWAL OF CAVEAT 13888056
14115733	CAVEAT BY BUNGALA THREE PTY. LTD. (ACN: 619 211 602)

## Notations

**Dealings Affecting Title** NIL

**Priority Notices** NIL

**Notations on Plan** NIL

### Registrar-General's Notes

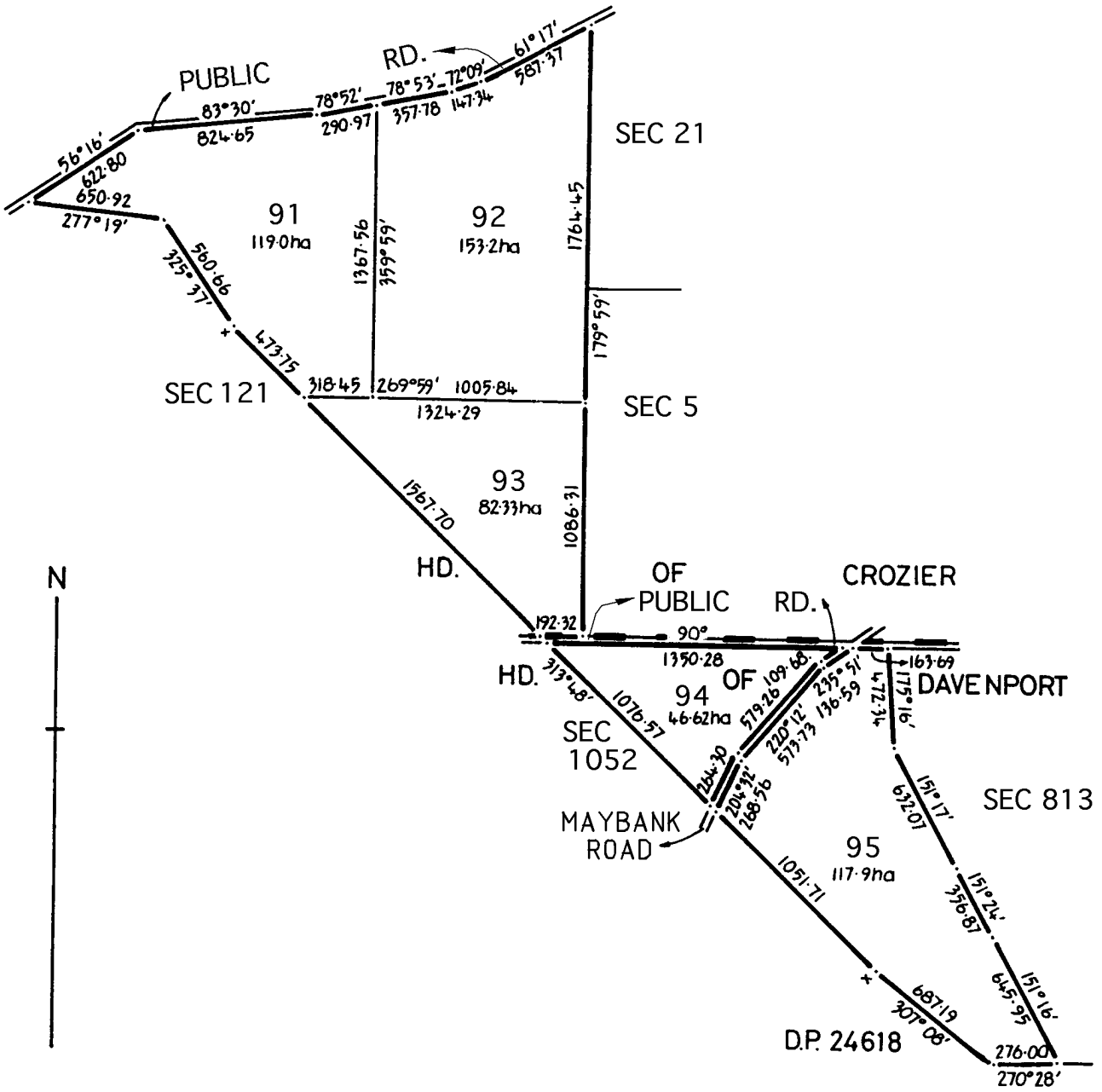
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 APPROVED FILED PLAN FOR LEASE PURPOSES FX252231  
 APPROVED FILED PLAN FOR LEASE PURPOSES FX252232  
 APPROVED FILED PLAN FOR LEASE PURPOSES FX252285  
 APPROVED FILED PLAN FOR LEASE PURPOSES FX252919  
 UNAPPROVED FX253270  
 APPROVED FX252488  
 FOR INFORMATION PURPOSES ONLY FX251900  
 FOR INFORMATION PURPOSES ONLY FX252583  
 FOR INFORMATION PURPOSES ONLY FX253270

### Administrative Interests

SIGNIFICANT ENVIRONMENTAL BENEFIT NVR2018-3160-010

This plan is scanned for Certificate of Title 4360/722  
 See title text for easement details.

LAST PLAN REF : D.P. 24618

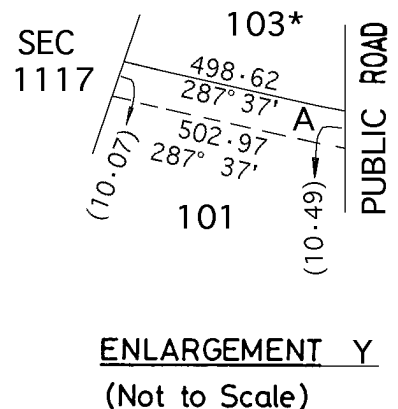
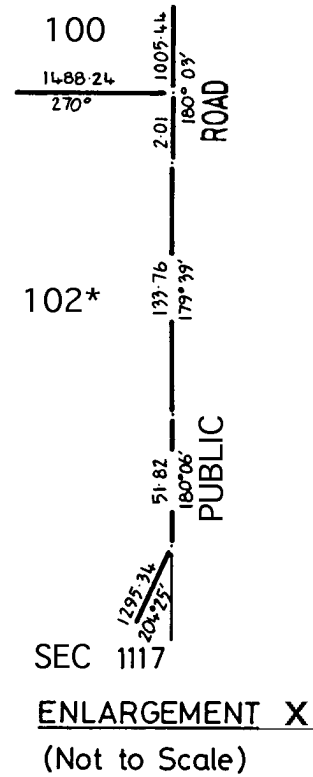
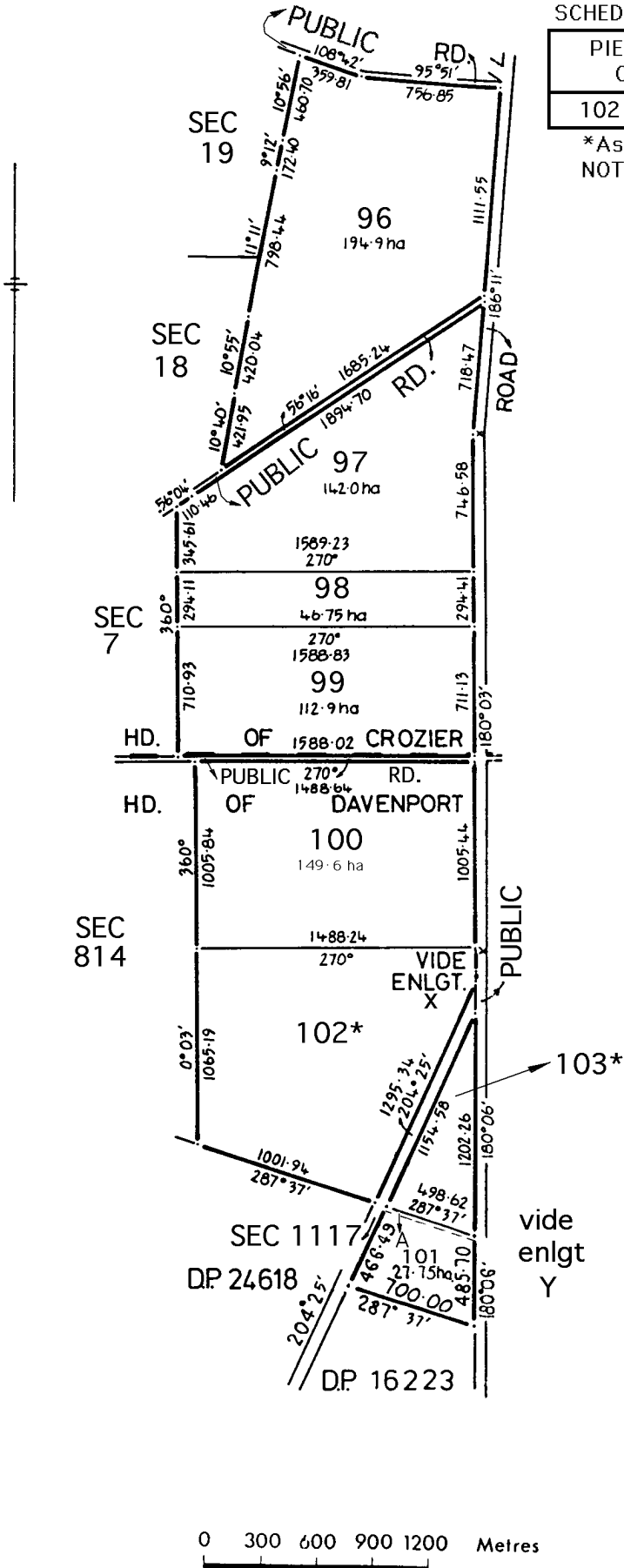


Note : Subject to all lawfully existing plans of division

**SCHEDULE OF PIECES COMPRISED IN ONE ALLOTMENT**

PIECES COMPRISED IN ONE ALLOTMENT	TOTAL AREA
102 AND 103	186.2 ha

\*Asterisk denotes PIECE identifier only.  
 NOTE: All remaining parcels are each an allotment.



# Appendix B

## Consultation Report

# Emeroo BESS Consultation Report

26-Feb-2025  
Emeroo BESS

# Emeroo BESS Consultation Report

Client: Potentia Energy

ABN: 91 646 972 619

Prepared by

**AECOM Australia Pty Ltd**

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ABN 20 093 846 925

26-Feb-2025

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## Quality Information

Document Emeroo BESS Consultation Report

Ref


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Date 26-Feb-2025

Originator Hannah Kennedy

Checker/s Tom Hateley

### Revision History

Rev	Revision Date	Details	Approved	
			Name/Position	Signature
0	18-Dec-2024	Final for Submission	Tom Hateley Associate Director - Planning	
1	24-Jan-2025	Final for Submission	Tom Hateley Associate Director - Planning	
2	26-Feb-2025	Final for Submission	Tom Hateley Associate Director - Planning	

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## 1.0 Introduction

### 1.1 Project overview

The Bungala Solar Farm is located approximately 10km northeast of Port Augusta, within regional South Australia. The Bungala Solar Farm is a 220MWac photovoltaic (PV) solar farm that has been operational since 2020.

The existing solar farm is located on land owned by the Bungala Aboriginal Corporation (BAC), with the land leased to the solar farm.

Emeroo BESS Pty Ltd (being a related entity of Potentia Energy) Potentia Energy is proposing to develop a 225MW/900MWh Battery Energy Storage System (BESS) (the Project) at the Bungala Solar Farm.

Potentia Energy is seeking to obtain an Associated Infrastructure Licence (the Licence) for the Project under the *Hydrogen and Renewable Energy Act 2023* (HRE Act). An Associated Infrastructure Licence Application was lodged with the Department for Energy and Mining (DEM) on 1 October 2024.

The BESS will comprise:

- Containerised batteries, inverters and power conversion units
- Substation
- O&M and storage buildings
- Electricity connections to the existing Bungala Solar Farm substation, including upgrades/additional infrastructure within the existing substation
- Associated fencing, access and site works

### 1.2 Consultation report overview

#### 1.2.1 Purpose of the document

This report seeks to summarise the consultation that occurred and it proposed to occur with key stakeholders regarding the proposed new battery storage system at Bungala Solar Farm, and satisfy the legislative requirements outlined below.

A key input to this Consultation Report was the Bungala BESS Engagement and Social Licence Commitments Report (ERM, 2024), and the engagement register prepared by Potentia Energy.

#### 1.2.2 Legislative requirements

In accordance with Sections 61 and 63 of the HRE Act, a licensee is required to undertake consultation on the proposed Environmental Impact Report (EIR) and Statement of Environmental Objectives (SEO) for the project.

Having regard to the land tenure and other interests over the Project site, the following stakeholders are required to be consulted by the licensee pursuant to Regulation 33(2)(b) of the *Renewable Energy Regulations 2024* (HRE Regulations).

**Table 1 Statutory Stakeholders**

Stakeholder	Relevance
Bungala Aboriginal Corporation	Regulation 33(2)(b)(i) – Landowner
Nukunu Wapma Thura Aboriginal Corporation	Regulation 33(2)(b)(i) & (ii) – Landowner/Native Title Holder
Torrens Energy (SA) Pty Ltd	Regulation 33(2)(b)(i) – Landowner/Tenement holder (GEL 572)
Port Augusta City Council	Regulation 33(2)(b)(v)(A) – Relevant Council

Stakeholder	Relevance
Outback Communities Authority	Regulation 33(2)(b)(v)(B) – Relevant Authority for area of the site outside of a Council area

This consultation report seeks to satisfy the requirements under Regulation 33(4) of the *Hydrogen and Renewable Energy Regulations 2024* (HRE Regulations), being:

- Preparation of a consultation report setting out-
  - The persons consulted; and
  - Any issues of concern raised by person consulted; and
  - The steps (if any) taken or proposed to be taken by the licensee to address those concerns

Consultation has occurred and is proposed to occur with the relevant statutory persons outlined in Regulation 33(2)(b) of the HRE Regulations and other relevant community stakeholders.

The Project specific issues raised by stakeholders to-date have been considered and addressed in the EIR and SEO. Any additional matters raised during the upcoming consultation will also be captured in the EIR and SEO.

Upon formal submission of the EIR and SEO, the Minister will undertake public consultation on the EIR and SEO as required under section 72 of the HRE Act, in accordance with Regulation 39 of the HRE Regulations. Any feedback received during this consultation process will be further considered and incorporated, where relevant, into the EIR and SEO prior to finalisation

## 2.0 Site context and neighbours

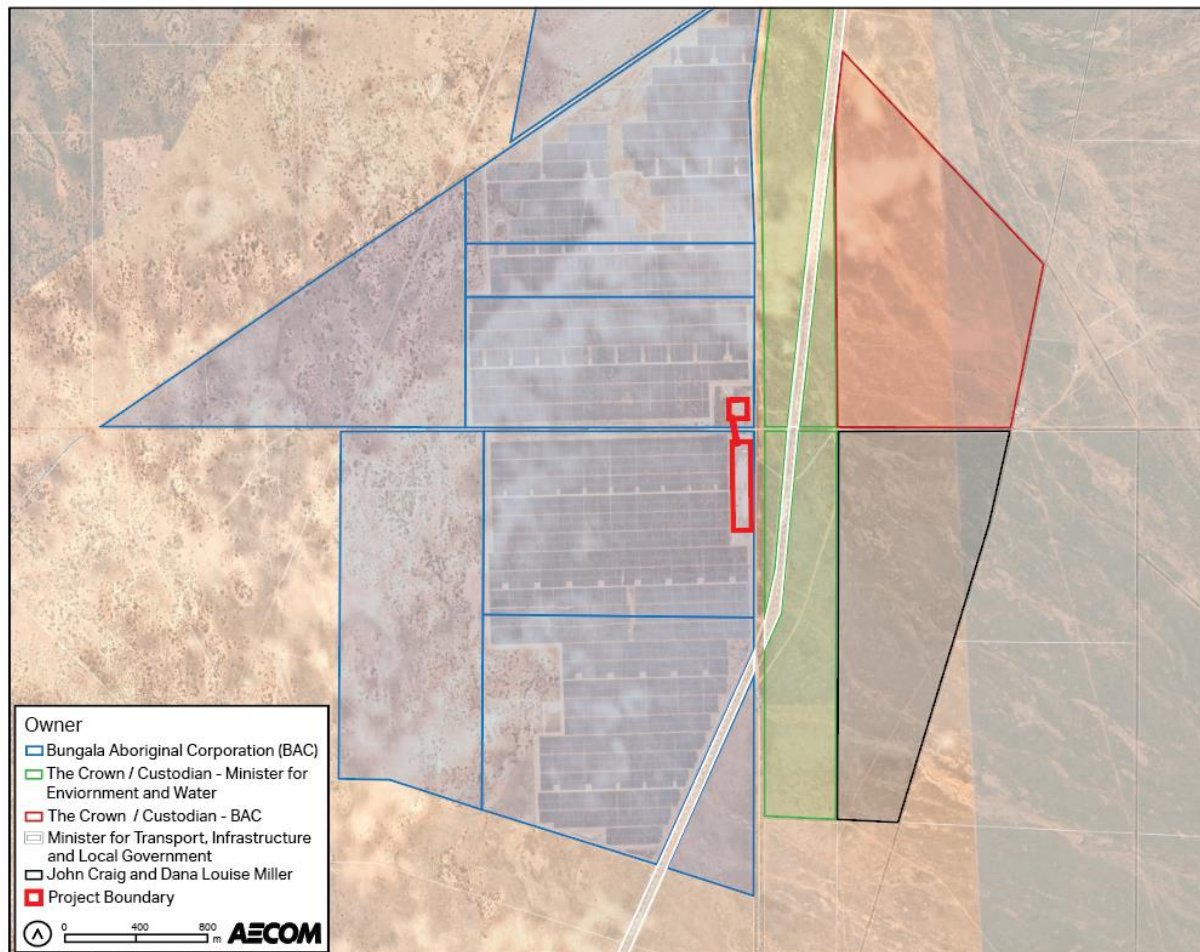
Fit for purpose consultation has been/proposed to be undertaken with the relevant statutory stakeholders as required under the HRE Act. Given the nature of the project, relatively minor interest and issues from stakeholders are anticipated in relation to the BESS specifically.

This is in part due to the relatively remote location, and the adjoining land owners being familiar with the solar farm project, and involved in the project such as the Bungala Aboriginal Corporation (BAC), who own the land where the BESS is proposed, as well as the solar farm land to the north, south, west. BAC are also the custodians of the Crown Land located to the east, shown in Figure 1, which contains the Emeroo Homestead (nearest sensitive receiver).

To the east of the proposed BESS site is a road, under the care and control of the Port Augusta City Council (portion of road south of BESS site) and Minister for Transport and Infrastructure (portion of road north of the BESS site), and narrow parcels of land under the control of the Minister for Environment and Water.

Figure 1 demonstrates the limited impact the project has on neighbours due to siting and ownership of adjoining land parcels.

Figure 1: BESS project boundary and neighbouring land ownership map



### 3.0 Consultation history

The consultation history below has been extracted from the Engagement and Social Licence Commitments Report (ERM, 2024) and summaries the broader engagement and stakeholder relationships that have developed over many years.

EPGA commenced targeted engagement with key stakeholders in 2017 as part of the Bungala Solar Farm early works. It is noted that consultation with the BAC had commenced in the years prior, however, this was primarily undertaken by Potentia Energy and the previous developer, in order to facilitate land leasing arrangements.

This initial targeted engagement with stakeholders covered matters such as potential issues and impacts associated with the solar project, the best approach to future engagement, and identification of opportunities to Create Shared Value (CSV). Target stakeholders comprised representatives from:

- Bungala Aboriginal Corporation;
- Port Augusta City Council;
- Department of Energy and Mining;
- Regional Development Australia Far North; and
- Outback Communities Authority.

Issues and opportunities initial raised by stakeholders primarily related to:

- Cultural heritage management;

- Traffic and dust management
- Employment and upskilling potential
- Community development.

Since the initial engagement in 2017, Potentia Energy has undertaken a range of engagement activities with stakeholders to ensure compliance with the Planning Approval conditions, and to provide regular updates and discuss potential CSV opportunities. In 2019, Potentia Energy formally updated the approvals for the Bungala Solar Farm to include installation of 40MW BESS. This change in the approval necessitated engagement with the relevant State and Local Government representatives (such as the Department of Infrastructure and Transport, and the Port Augusta City Council), as well as with the BAC.

During the Construction Phase of the Bungala Solar Farm, Potentia Energy implemented a Community and Stakeholder Engagement Plan and employed a locally based Community Liaison Officer (CLO) to guide stakeholder engagement. The CLO helped Potentia Energy to better carry out the actions specified within the Community and Stakeholder Engagement Plan, connect directly with the local community, be provided with local insight into local issues/concerns, and more effectively communicate project-related information. The Project website was used to provide regular updates to stakeholders.

Potentia Energy also sought to maintain open and transparent stakeholder engagement as the Bungala Solar Farm transitioned into the Operation Phase. The project website was retained, and face-to-face engagement activities continued to be carried out by Potentia Energy on an ad hoc basis, typically in response to local community interest or requests. These engagement activities have included facilitating site visits for interested stakeholders. The CLO was also retained, with the CLO's knowledge of the local community helping Potentia Energy to identifying various benefit sharing / CSV initiatives and understand local community sentiments toward the Bungala Solar Farm.

## 4.0 Project specific consultation

### 4.1 Who was consulted?

Potentia Energy undertook a series of stakeholder meetings in April and May 2024 in order to understand stakeholder issues and/or concerns specifically related to the inclusion of the proposed BESS at the site, and identify potential new CSV activities or initiatives that Potentia Energy could look to implement within the local community.

An overview of the main stakeholder meeting is presented in Table 2.

**Table 2 list of stakeholders consulted about the BESS**

	Stakeholder	Date
1	Bungala Aboriginal Corporation (BAC)	23 April 2024
2	Port Augusta Rotary Club (RCPA)	24 April 2024
3	Regional Development Australia Far North (RDAFN)	1 May 2024
4	Outback Communities Authority (OCA)	1 May 2024
5	Port Augusta City Council	9 May 2024
6	Port Augusta Community Outreach (PACO)	22 May 2024

Stakeholders are in regular contact with Potentia Energy to support ongoing and effective relationships. From April to December 2024 Potentia Energy have interacted with stakeholders via a mix of methods including face-to-face meetings, virtual meetings, phone calls, and emails.

A total of 68 interactions with stakeholders have been recorded during the abovementioned timeframe, including the meetings detailed in Table 2. Additional community stakeholders in contact with Potentia Energy include the Port Augusta Secondary School, Polly Farmer Foundation and RSL Club Port Augusta.

Some stakeholder interactions focused exclusively on the proposed BESS, others included a range of matters about the BESS, the existing solar farm, and community development.

In addition, since April 2024 Potentia Energy has undertaken consultation with the following State Government agencies to inform the approval requirements for the BESS project:

- Department for Energy and Mining (DEM)
- Department for Trade and Investment – Planning and Land Use Services (PLUS)

The focus of the consultation that has occurred with stakeholders was specifically on the potential impacts of the BESS and any recommended controls which have been considered and addressed in the EIR and SEO. The consultation was therefore undertaken in accordance with Regulation 33(2)(d) and 33(2)(e) of the HRE Regulations.

## 4.2 What issues were raised?

An overview of input raised by stakeholders during BESS related discussions is provided in Table 3.

Of the four main issues raised by stakeholders in 2017 (as mentioned in Section 3.0), three were raised again in the 2024 meetings. A short summary is provided under the main topics of interest:

- **Traffic and dust:** The management traffic and dust was raised primarily by stakeholder in reference to past activities (i.e. construction of Bungala Solar Farm) rather than in the context of the proposed BESS.
- **Housing:** Project stakeholders stated that housing availability has declined in the Port Augusta area and is a matter of ongoing concern for the residents of Port Augusta, as it is elsewhere within Australia. Rising rental costs have seen an increase in homelessness which has been identified as a common issue in Port Augusta and often raised by the community as their number one concern.
- **Employment:** The lack of employment was mentioned by stakeholders as a serious concern amongst community members and was linked to various other social issues apparent within Port Augusta, such as anti-social behaviour and drug/alcohol addictions.
- **Cultural heritage management:** Concern regarding cultural heritage management was not raised in any of 2024 the meetings. Proactive engagement with First Nations communities and managing cultural values was stated by various stakeholders as being key to maintain a successful relationship with the local community.

## 4.3 What was done with the feedback?

Most of the stakeholder feedback provided related to wider issues in Port Augusta and Regional South Australia, rather than feedback specific to the proposed BESS. This suggests stakeholders were not notably concerned with the nature of the proposed development in terms of the location, height, materials, vehicle access, environmental impact etc. This outcome was somewhat anticipated given the subsidiary nature of the BESS, to support the existing solar farm facility. Also, the site distance from Port Augusta (approximately 10km) provides a relatively remote and discrete area for the proposed BESS.

Dust concerns were raised, not specially for the BESS, rather past activities on the site. Nonetheless in response to the feedback, dust (and traffic) impacts have been considered in the EIR and SEO with dust suppression proposed to be addressed in the Construction Environmental Management Plan (CEMP).

Wider issues that were raised included the lack of affordable and available housing, and lack of employment in the wider area. Suggestions were given as to how the proposed development could have a positive impact on the community, through employment and upskilling of locals. Some of

opportunities for CSV activities are mentioned in Table 3, and were reviewed in more detail as part of the Social Licence Commitments Report.

Table 3: Overview of stakeholder discussions about the BESS, in April and May 2024

#	Interview Details	Stakeholder	Project Feedback	Engagement Comments	CSV and Design Response Opportunities
1	23 April 2024	<b>Bungala Aboriginal Corporation (BAC)</b>  Ray Willis - CEO	<ul style="list-style-type: none"> <li>The BAC has a good understanding of the Bungala Solar Farm</li> <li>Positive towards the Project and Potentia Energy Team</li> </ul>	<ul style="list-style-type: none"> <li>Suggests ongoing engagement with the BAC (as-needs basis)</li> <li>Internal uncertainties within BAC organisations at present which may impact engagement</li> <li>Recommends engagement with the new CEO and Board after Annual General Meeting</li> </ul>	<ul style="list-style-type: none"> <li>None provided during interview but advised that he may send suggestions through at a later stage</li> </ul>
2	24 April 2024	<b>Rotary Club of Port Augusta (RCPA)</b>  Nathan O'Brien – President	<ul style="list-style-type: none"> <li>Nil</li> </ul>	<ul style="list-style-type: none"> <li>RCPA meets on Wednesday evenings</li> <li>RCPA to be updated through provision of bulletins and/or emails</li> <li>Suggested Potentia Energy use local social media pages, local radio, and local newspaper as outlets</li> <li>Suggested use of imagery to help information dissemination within the local community</li> <li>Presence of other communities (e.g. Indian/Sikh) within Port Augusta may require a different type of engagement</li> <li>Suggested Potentia Energy set up an information booth at the local Lions Club</li> </ul>	<ul style="list-style-type: none"> <li>Suggested Potentia Energy look into opportunities to support the lower socio-economic population of Port Augusta</li> <li>Employment opportunities would be appreciated within the community</li> <li>Early childhood education provides another opportunity for CSV – opportunity for students to learn more about renewable energy</li> </ul>
3	01 May 2024	<b>Regional Development Australia Far North (RDAFN)</b>  Claire Wiseman – CEO	<ul style="list-style-type: none"> <li>Was previously involved in training opportunities with the Bungala Solar Farm</li> <li>Mentioned the small rates received by Council and the impact on infrastructure associated with renewable energy projects</li> <li>Identified dust as an issue</li> <li>Identified housing shortage and anti-social challenges</li> </ul>	<ul style="list-style-type: none"> <li>Local community is well organised through social media</li> <li>Interested in information on workforce size (in relation to housing pressure/concerns)</li> <li>RDAFN has monthly team catch up meetings with Council and recommends attendance to Potentia Energy</li> </ul>	<ul style="list-style-type: none"> <li>Suggests investigating long-term legacy options, such as the establishment of a community benefit funds to facilitate local projects</li> <li>Suggested potential investment in training and upskilling opportunities, cultural initiatives, and education</li> <li>Suggested potential initiatives to combat housing shortages and issues with anti-social behaviour</li> </ul>

#	Interview Details	Stakeholder	Project Feedback	Engagement Comments	CSV and Design Response Opportunities
			as key considerations for Port Augusta		<ul style="list-style-type: none"> <li><a href="#">Conference &amp; Trade Expo - Tactic</a> is occurring in July and recommends Potentia Energy to be in attendance</li> </ul>
4	01 May 2024	<p><b>Outback Communities Authorities (OCA)</b></p> <p>Philip Gibb - Manager Policy and Community Affairs</p> <p>Margaret Howard – Director</p>	<ul style="list-style-type: none"> <li>Raised that the infrastructure associated with renewable energy projects is a cost to local governments</li> <li>Raised that local housing pressures are impacting the local community.</li> </ul>	<ul style="list-style-type: none"> <li>Suggests milestone-based engagement (email) as OCA has dual reporting responsibility to State Government</li> <li>Key interest is understanding on local employment opportunities</li> <li>Raised the importance to reach out to traditional owners</li> <li>Presence of other communities within Port Augusta may require a different type of engagement</li> </ul>	<ul style="list-style-type: none"> <li>Suggests sustainable community fund to support outback communities to transition from energy systems to other means of energy generation</li> <li>Encourages localised employment opportunities</li> <li>Suggests educational initiatives through providing other Potentia Energy examples across Australia</li> </ul>
5	09 May 2024	<p><b>City of Port Augusta</b></p> <p>Linley Shine – Mayor</p> <p>John Banks – CEO</p>	<ul style="list-style-type: none"> <li>Asked about the lifespan of a BESS</li> <li>Mentioned that dust issues and visual impacts were a concern in relation to tourism at early stages of Bungala Solar Farm</li> <li>Stated that the access road is prone to flooding</li> </ul>	<ul style="list-style-type: none"> <li>Suggests future planning and agreements will require engagement</li> </ul>	<ul style="list-style-type: none"> <li>Supports long-term agreements and partnerships, noting that a 3-5 year agreement with Potentia Energy would be preferable</li> <li>Funding for road improvements (flood proofing)</li> <li>Suggests community education on renewable energy which may positive impact tourism</li> <li>Potential to improve Port Augusta's reputation through arts events</li> <li>Suggests connection with 2025 Technical College (Year 10 onwards, hub with housing for 44 students) and opportunities for apprenticeships – Council can help Potentia Energy by making the appropriate introductions</li> <li>Suggests Potentia Energy present to the Aboriginal Advisory Committee in person, at a bi-monthly meeting (is a voice-type model that advises Council).</li> </ul>

#	Interview Details	Stakeholder	Project Feedback	Engagement Comments	CSV and Design Response Opportunities
6	22 May 2024	<p><b>Port Augusta Community Outreach (PACO)</b></p> <p>Theresa Hines – CEO</p> <p>Zoe Martin – Project Manager</p>	<ul style="list-style-type: none"> <li>Suggests that the Project should look at apprenticeships and training opportunities, along with working with schools and youth</li> </ul>	<ul style="list-style-type: none"> <li>Suggests large community gatherings to present the project, as well as one-on-ones with representatives</li> <li>Raised the importance of access to information (e.g. through use of local Aboriginal radio station, newspaper, and glossy brochures)</li> <li>PACO has a close relationship with BAC and the Nukunu</li> </ul>	<ul style="list-style-type: none"> <li>Local employment opportunities are key given high unemployment rates (e.g. for civil works like fencing and vegetation management), with approximately 25% of the population living off less than \$600 per week</li> <li>Opportunities for Potentia Energy to support initiatives to address current social issues, including anti-social behaviour, domestic violence, addiction, and poor literacy and numeracy rates</li> </ul>

## 5.0 Additional Consultation

As identified in section 1.2.2, a number of stakeholders are required to be consulted by the licensee pursuant to Regulation 33(2)(b) of the HRE Regulations.

Additional consultation, specially on the BESS project, occurred with the following statutory stakeholders from 30 January 2025 to 13 February 2025, as these stakeholders were not consulted during the initial consultation phases detailed in section 4.0:

- Torrens Energy (SA) Pty Ltd
- Nukunu Wapma Thura Aboriginal Corporation

The outcomes of this consultation is summarised in Table 4.

**Table 4 Additional Landowner Consultation Summary**

Stakeholder	Comments	Response
Torrens Energy (SA) Pty Ltd	Raised no concerns or issues associated with the BESS project.	Noted.
Nukunu Wapma Thura Aboriginal Corporation (Nukunu)	Advised that due a large volume of work on at the moment, it has not been able to consider the EIR and SEO. The Project will be raised at the next available board meeting.	Potentia will continue to engage with Nukunu to ensure cultural heritage considerations are appropriately considered and addressed by the Project and will adopt any required management requirements within the OMP.

## 6.0 Summary

This report seeks to summarise the consultation that occurred with key stakeholders regarding the proposed new battery storage system at Bungala Solar Farm, and to satisfy the legislative requirements.

Fit for purpose consultation has been undertaken with the relevant statutory stakeholders and required under the HRE Act. Given the nature of the project, relatively minor interest and issues from stakeholders were anticipated in relation to the BESS specifically.

This is in part due to the relatively remote location, and the adjoining landowners being familiar with the solar farm project, and involved in the project such as the Bungala Aboriginal Corporation.

Engagement with stakeholders occurred from April to December 2024. Targeted meetings were held with key stakeholders in April to May 2024 to discuss the BESS. Additional consultation with landowners, as defined by the HRE Act, occurred from 30 January 2025 to 13 February 2025.

Most of the stakeholder feedback provided to-date related to wider issues in Port Augusta and Regional South Australia, rather than feedback specific to the proposed BESS. This suggests stakeholders were not notably concerned with the nature of the proposed development in terms of the location, height, materials, vehicle access, etc. This outcome was somewhat anticipated given the subsidiary nature of the BESS, to support the existing solar farm facility, and the discrete location.

Dust concerns were raised, not specially for the BESS, rather past activities on the site. Nonetheless in response to the feedback, dust impacts have been considered in the EIR with dust suppression proposed to be addressed in the Construction Environmental Management Plan (CEMP).

Wider issues that were raised included the lack of affordable and available housing, and lack of employment in the wider area. These matters will be considered further as part of the Social Licence Commitments and Potentia Energy's ongoing desire to support the local community.

# Appendix C

## Agency Submission Summary

Agency	Comments	Response
<b>Aboriginal Affairs &amp; Reconciliation Attorney-General's Department</b>	<p>Provided general comments in relation to:</p> <ul style="list-style-type: none"> <li>• Potentia's previous and ongoing engagement with BAC, Nukunu the broader Aboriginal Community and other Aboriginal parties.</li> <li>• The existing Aboriginal Heritage Management Plan for Bungala Solar Farm.</li> <li>• The unknown level of excavation required and increase in footprint size since approval for a previous design in 2021.</li> <li>• Project area's previous disturbance during construction of stage 1 BS Farm.</li> <li>• Identification of potential environmental impacts during construction</li> <li>• Project area does not interact with any Aboriginal sites on the AAR central archives</li> <li>• Obligations under the AHA (Section 23, Section 20).</li> </ul>	<p>Comments noted – No action required.</p>
	<p>Recommended the following for ID AH1 in Table 8 of the EIR:</p> <ul style="list-style-type: none"> <li>• in the 'Control measures' column, AAR notes that an 'Employ Risk management approach' would not be possible if heritage cannot be avoided. This measure should be amended to clarify that the approach would be limited to avoiding and protecting the heritage. This comment is also relevant to Table 1 of the SEO.</li> <li>• in the 'Control measures' column, AAR recommends that Potentia considers including, as a control measure, the engagement of Aboriginal heritage monitors to observe ground-disturbing works.</li> <li>• AAR recommends that a reference to reporting Aboriginal heritage be included. The reference should state that section 20 of the Act requires discoveries of heritage to be reported to AAR as soon as reasonably practical, and discoveries of potential human remains must be reported to SAPOL immediately via 131 444.</li> <li>• both references to 'sites or objects' should be amended to read 'Aboriginal sites, objects or remains'.</li> </ul>	<p>Amend as recommended with the exception of the second dot point relating to monitoring.</p> <p>In recognition of the highly disturbed site, a reference to be added that all ground disturbance work will be undertaken in accordance with agreed AHMP.</p>

Agency	Comments	Response
	<p>Recommended the following for ID AH1 in Table 9 of the EIR:</p> <ul style="list-style-type: none"> <li>in the 'Avoidance' column, if avoidance relates to the risk of unknown heritage within the Project area, then AAR suggests that the word 'No' here be amended to 'Unknown'. The current wording suggested that impacts to heritage are inevitable, which AAR does not consider to be Potentia's intent here.</li> <li>in the 'Cumulative Effects' column, the reference in this column to 'Aboriginal heritage values in the project area have already been disturbed due to the development of the Bungala Solar Farm' is unclear to AAR. Please clarify whether this is a reference to Aboriginal sites, objects or remains (and therefore a potential breach of section 23 of the Act) or other areas/landforms that may hold cultural sensitivity (e.g. waterways). This is an important difference that should be clarified (and the column amended if appropriate).</li> </ul>	Amend as recommended.
<b>Department of Primary Industries and Regions</b>	<p>Noted the following in relation to the <i>Livestock Act 1997</i> (relevant to Consultation Report and Environmental Report):</p> <ul style="list-style-type: none"> <li>PIRSA is not aware of any livestock disease or residue issues associated with the land in scope.</li> <li>PIRSA note that the land in scope has been assigned a Property Identification Code (PIC) under the <i>Livestock Act 1997</i>. This indicates that livestock may be present on or around the site for the Battery Energy Storage System (BESS). PIRSA note that the persons to whom the PIC is registered do not appear in the list of stakeholders that Potentia Energy consulted outlined on page 4 of the Emeroo BESS Consultation Report.</li> </ul>	<p>The BESS is to be constructed on cleared land within the existing solar farm and will not impact on existing grazing activities. Potentia will undertake consultation separately and during the construction process with persons to whom the PIC is registered to, as required.</p> <p>No action required.</p>
	<p>Noted the following relevant to the SEO, page 8:</p> <ul style="list-style-type: none"> <li>Fire originating from the BESS facility – Include response for weather conditions that maybe experienced, i.e. during extreme and catastrophic days or to do with drought. Note SA</li> </ul>	Text to be added to the Achieving Objectives column of Impact ID AQ2 recommending additional considerations for high fire danger days.

Agency	Comments	Response
	<p>has been experiencing extremely dry conditions with dust buildup on electrical equipment leading to arcing/sparking.</p> <p>Decommissioning and Rehabilitation Plan to consider (SEO, page 12 and 13):</p> <ul style="list-style-type: none"> <li>• Ensure leading practice in land rehabilitation, noting the arid environment and the time required for vegetation to reestablish.</li> <li>• Ensure the waste management hierarchy is addressed in the decommissioning, especially in recycling/reusing/recovery etc of materials and infrastructure before disposing. Are there any measures that can be taken during construction to prevent waste or enable the reuse, recycling and recovery?</li> </ul>	<p>Comments noted - to be addressed as part of the OEMP and the Decommissioning and Rehabilitation Plan, including any measures to prevent waste or enable reuse, recycling and recovery.</p> <p>No action required.</p>
	<p>General comment:</p> <p>The SEO does not outline any ongoing community engagement regarding the project, whilst there will be a complaints process, it is also important to consider having information on the project that can be shared with the community during the various stages, especially important in building community support for the project and future activities.</p>	<p>The SEO is not required to address general ongoing community engagement, pursuant to the HRE Act/Regulations.</p> <p>It is noted that Potentia Energy are active in the community and regularly engage with relevant stakeholders and the community in relation to the Bungala Solar Farm which includes various Create Shared Value initiatives (refer to Consultation Report). This will continue in association with the BESS.</p> <p>No action required.</p>
<p><b>South Australian Country Fire Service (SACFS)</b></p>	<p>Provided general comments in relation to:</p> <ul style="list-style-type: none"> <li>• Bushfire Hazard Overlay, Fire Response Capability and Land Use.</li> </ul>	<p>Comments noted – No action required.</p>
	<p>Provided design recommendations in relation to:</p> <ul style="list-style-type: none"> <li>• Siting – establishment of an Asset Protection Zone and location of infrastructure at a minimum distance of 17 m from property boundaries or existing remnant vegetation.</li> </ul>	<p>Design recommendations will be addressed as part of the detailed design process and OEMP.</p> <p>Reference to establishing a Bushfire Management Plan and Emergency Management Plan to be added</p>

Agency	Comments	Response
	<ul style="list-style-type: none"> <li>• Access/Egress – internal road networks should achieve compliance with relevant hazard overlay, roads should be a minimum width of 6 m and include adequate separation.</li> <li>• Access/Egress roads on the project site – should achieve adequate separation, meet design and manoeuvring requirements, and any other safety measures prescribed by the National Construction Code.</li> <li>• Vegetation Management – vegetation management zone within Asset Protection Zone including management of understorey vegetation, grasses and dead vegetation.</li> <li>• Water Supply – inclusion of static fire water tanks in accordance with SA Fire Service Policy 14 requirements.</li> <li>• Emergency Response Planning – establishment of a Bushfire Management Plan and Emergency Management Plan to be established, on-site training and site inductions for emergency service personnel.</li> <li>• Building Considerations and BESS – comply with National Construction Code, incorporation of additional notes for energy facilities or BESS including clearances for large emergency service vehicles, servicing of detection and suppression systems, and use of correct personnel to open battery rack.</li> </ul>	to associated EIR/SEO impact ID AQ2 as a subplan to the OEMP/CEMP.
<b>Department for Environment and Water (DEW)</b>	<p>Provided the following notes related to native vegetation, biodiversity values and threatened species:</p> <ul style="list-style-type: none"> <li>• Previous clearance consent was provided by NVC for the Bungala Solar Farm that included part of the Emeroo BESS site. Regulation 8(9) allows for regrowth to be cleared within 5 years of the original clearance consent or within 5 years of subsequent clearance of regrowth.</li> <li>• DEW expects that the potential presence of any EPBC and NPW Act listed species is adequately addressed in the EIR and SEO under the HRE Act.</li> </ul> <p>Recommends the following:</p>	<p>Comments noted.</p> <p>Submission of AECOM desktop report is not considered to be required as the key outcomes are provided/summarised in EIR. As the site has been cleared and developed, potential impacts to native and listed species have not been identified.</p> <p>In response to the management of weeds of significance, and Impact ID/Objective relating to weed and pest incursion will be included in EIR &amp; SEO. It is noted that the specific weed management measures will be addressed in CEMP/OEMP.</p>

Agency	Comments	Response
	<ul style="list-style-type: none"> <li>Provide a copy of the AECOM 2024 desktop ecology study to DEW for greater understanding of statements made in section 7.2 and 7.2.15 (EIR).</li> <li>Further consideration of flora, fauna and weed impacts in SEO section 4.</li> <li>Noted that 2 weeds of significance (Buffel Grass and African Boxthorn) that may require additional control measures in addition to vehicle hygiene.</li> </ul>	
	<p>Provides the following notes in relation to state heritage:</p> <ul style="list-style-type: none"> <li>State Heritage Place (The Ostrich Farm, SHP ID 12702) is located across several parcels of land including at the Emeroo BESS location, and includes fencing posts and gates.</li> <li>DEW is concerned that heritage elements remain on the Emeroo BESS site that need to be identified and protected.</li> <li>Photos have been provided showing potential heritage fencing at the Bungala Solar Farm (provided in Enclosure 1).</li> </ul> <p>Requests the following:</p> <ul style="list-style-type: none"> <li>Confirmation that the proposed development will not impact any remnant heritage fencing, could be provided in the form of photos with a map showing location of each photo.</li> <li>Contractors working on construction of the BESS to be made aware of requirements of the Heritage Places Act 1993 (including stop works protocol, notification of SA Heritage council, permits).</li> </ul>	<p>The Ostrich Farm, SHP ID 12702 boundary is extensive as it aligns with cadastral boundaries referenced in the listing rather than the specific location of remnant items associated with the listing.</p> <p>No elements of the State Heritage Place exist on or adjacent to the site, noting the BESS site consists of developed, cleared land.</p> <p>It is noted that the images provided in Enclosure 1 do not have any reference to location, however, these do not exist within/adjacent the site.</p> <p>Relevant find procedures and requirements, pursuant to the <i>Heritage Places Act 1993</i> will be incorporated included in the CEMP.</p> <p>No action required.</p>
	<p>Provides the following note in relation to wildlife permits:</p> <ul style="list-style-type: none"> <li>Should the applicant need to catch, move, or relocate or destroy any protected animal or eggs, application of a permit is required under SA legislation.</li> </ul>	<p>This requirement can be included/addressed in the CEMP/OEMP.</p> <p>No action required.</p>
<b>Planning and Land Use Services</b>	Reviewed the EIR and SOE documents and supports the conclusions that the proposal would result in minimal environmental impacts that could be adequately addressed via standard environmental	Noted – No action required.

Agency	Comments	Response
	management practices (i.e. in accordance with a CEMP, OEMP and Decommissioning & Rehabilitation Plan).	
<b>South Australian Arid Lands Landscape Board (SALB)</b>	<p>Recommended the following in relation to weed management:</p> <ul style="list-style-type: none"> <li>Adding appropriate lines detailing how weed control will be monitored and managed. Actions such as car hygiene practices and staff training are imperative parts of effective declared weed management. This is especially important if company cars are driven in different parts of the state or up and down the highway regularly. Buffel grass is commonly found along Augusta Highway so spread of this weed should be considered.</li> </ul>	Impact ID/Objective relating to weed and pest incursion to be included in the EIR & SEO. It is noted that the specific weed management measures will be addressed in CEMP/OEMP.
	<p>Recommended the following in relation to pest management:</p> <ul style="list-style-type: none"> <li>Adding appropriate lines detailing how pest animals will be monitored and managed. Note that there is a waste management plan that will form part of the OMP (EIR - Section 4.3 Management Plans). We suggest that it is included in this plan, waste management will also be considered from the perspective that pest predator species (such as cats and foxes etc.) will not be attracted to the site or have access to waste.</li> </ul>	Impact ID/Objective relating to weed and pest incursion to be included in the EIR & SEO. It is noted that the specific pest management measures will be addressed in CEMP/OEMP.
	Noted that surface water is not reasonably expected to be impacted by the proposed activities and therefore hasn't been identified as an environmental objective/potential impact event, however are interested in knowing how frequently the identified ephemeral watercourses flow in the Bungala Solar Farm and how surface and stormwater flows are managed. Are there any learnings that will be applied to the current project area?	Anecdotally, watercourses flow infrequently in the area. Surface and stormwater flow management will be addressed in the detailed design and management measures included in the CEMP/OMP, as required.  No action required.

# Appendix D

## Preliminary Site Plan

Plot Date: 2024-09-18 10:15 am. Filename: 525831-W00001-DRG-EL-0001.DWG



**SITE LAYOUT**  
SCALE: 1:2000

**LEGEND:**

- SITE BOUNDARY FENCE
- MEDIUM VOLTAGE POWER STATION
- BATTERY BLOCK
- AUX TRANSFORMER (NOTE 8)
- FIRE WATER TANK

SYSTEM RATING	225MW/900MWh
NUMBER OF INVERTERS	74
INVERTER RATING	CHARGING 3.95MVA DISCHARGING 4.4MVA
MVPS TRANSFORMER RATING	4.4MVA
NUMBER OF BATTERY CONTAINERS	370
BATTERY CONTAINER SUPPLIER AND MODEL (NOTE 9)	CATL EnerC+ 1.528MW 2.874MWh

**NOTES:**

1. THIS DRAWING SHOWS THE 33KV CONNECTION OPTION.
2. FINAL LOCATION OF THE RETENTION POND IS SUBJECT TO THE LOWEST POINT ON SITE.
3. ALL UNDERGROUND SERVICES TO BE IDENTIFIED AND LOCATED PRIOR TO ANY WORK BEING PERFORMED ON THE 33KV CABLE CORRIDOR, ACCESS ROAD AND FENCING.
4. LAYOUT SUBJECT TO CONNECTION AGREEMENT AND DETAILED DESIGN.
5. EXISTING STRUCTURE WITHIN PROJECT SITE WILL BE REMOVED.
6. LAYDOWN AREA TO BE IDENTIFIED DURING DETAILED DESIGN.
7. LOCATION OF THE GATES WILL BE CONFIRMED DURING DETAILED DESIGN, CONSIDERING RESTRICTIONS FOR THE SOLAR FARM SITE.
8. AUX TRANSFORMER SIZING SUBJECT TO DETAILED DESIGN.
9. BATTERY CONTAINER SUPPLIER TO BE CONFIRMED BEFORE DETAILED DESIGN.

DRAFT

REFERENCE DRAWINGS		
REV	DATE	REVISION DETAILS
A	2024.05.27	ISSUED FOR REVIEW
B	2024.05.28	UPDATES AS PER CLIENT FEEDBACK
C	2024.07.05	UPDATES AS PER CLIENT FEEDBACK
D		UPDATED TO 225MW/900MWh BESS

REFERENCE MODELS					
REV	DRAWN	DESIGNED	VERIFIED	APPROVED	
A	M.C	E.C/C.M	P.F	J.H	
B	J.K	E.C/C.M	P.F	J.H	
C	M.C	E.C/C.M	P.F	J.H	
D	J.K	E.C/C.M	P.F	J.H	


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CERTIFICATION	No.	CERTIFIER	DATE

CLIENT



CLIENT DOCUMENT NUMBER	REV

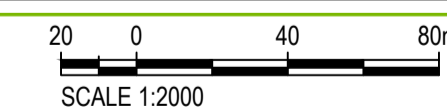
Coordinate system -  
Height datum -



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CONSTRUCTION STATUS	
NOT FOR CONSTRUCTION	
DRAWN BY	M.CHAPMAN
DESIGNED BY	E.CHEN/C.MASON
STATUS	SUITABLE FOR REVIEW AND COMMENT
CODE	S3
DOCUMENT STATE	SHARED

PROJECT			
EMEROO BESS			
TITLE			
EMEROO BATTERY ENERGY STORAGE SYSTEM OVERALL SITE LAYOUT			
DOCUMENT CODE			
525831-W00001-DRG-EL-0001			
SCALE	SIZE	REFERENCE No.	REV
1:2000	A1	EL-0001	D



All written dimensions take precedence over scaled dimensions.