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28 March 2023

Kurtis Wathen
Department of Planning and Environment
By Email: kurtis.wathen@dpie.nsw.gov.au

Re: SSD-33344237 - Bellambi Heights Renewable Project - Project update and refinements

Dear Kurtis,

1 Introduction

Vena Energy Services (Australia) Pty Ltd (VEA) proposes to develop the Bellambi Heights Renewable Project (SSD-33344237), within the Mid-Western Regional Council local government area and the Central-West Orana Renewable Energy Zone (CWO REZ). The project is in the locality of Beryl, approximately 6.5 km north-west of the township of Gulgong, New South Wales (NSW). VEA submitted a Scoping Report (EMM, 2022) in March 2022 (referred to herein as the Scoping Report), and Secretary's environmental assessment requirements (SEARs) for the project were issued in May 2022.

The purpose of this letter is to notify the Department of Planning and Environment of refinements to the project, namely that VEA has made the decision to remove the large-scale solar generation component from the project. This has occurred as a result of ongoing investigations undertaken as part of the environmental impact statement (EIS) for the project.

2 Project refinements

The Scoping Report (EMM, 2022) described the project as being located on Lot 101 and 102 of deposited plan (DP) 1203462, and including:

- a large scale solar photovoltaic (PV) generation facility along with battery storage and associated infrastructure, with a generation capacity of approximately 200 megawatts (MW) (equivalent of approximately 400 gigawatt hours (GWh) of energy annually);
- a battery energy storage system (BESS) with a capacity of approximately 200 MW and up to two hours of storage; and

- a switchyard connecting the solar farm and BESS to an existing 330 kV transmission line, which will be operated by TransGrid.

The Scoping Report (Section 1.1) envisaged further refinements to the project would take place prior to submission of the EIS as project design progressed.

Based on EIS investigations completed during 2022, in particular flooding and biodiversity, project refinements have occurred, which have resulted in VEA making the decision to remove the large-scale solar generation component from the project. The primary reasons for the removal of the large-scale solar generation component are:

- on the basis of environmental investigations and constraints analysis, a reduction in developable area within the site occurred, with the project footprint for solar generation reducing from around 304 hectares (ha) (as stated in the Scoping Report in March 2022), to around 224 ha (as at November 2022);
- the reduction in project footprint would have resulted in a solar farm design with a generation capacity significantly less than originally proposed; and
- VEA concluded that a solar farm with a constrained buildable footprint, in the proposed location, given the economic market, is not considered feasible.

However, VEA proposes to continue with the development application for the project, progressing ahead with:

- the BESS with a capacity of approximately 408 MW with up to 2 hrs storage, an increase from 200 MW as described in the Scoping Report; and
- a switchyard connecting the BESS to the existing 330 kV transmission line, as described in the Scoping Report.

The project name has been amended to reflect the refinements, and will now be known as the ***Bellambi Heights Battery Energy Storage System (Bellambi Heights BESS)***.

The proposed BESS and switchyard will require a footprint of around 20-25 ha on Lot 101 and 102 of DP 1203462. The physical layout and design of the project and how it has been refined, compared to the description in the Scoping Report, is presented in Table 2.1. An indicative project layout and development footprint is provided in Figure 2.1.

Table 2.1 Comparison of BHRP physical layout and design

Element	Project described in Scoping Report, March 2022	Proposed refinements, March 2023
Project name	Bellambi Heights Renewable Project	**Bellambi Heights Battery Energy Storage System**
Project area	Around 304 ha covering two properties, being Lots 101 and 102 of Deposited Plan 1203462 at 696 Castlereagh Highway and 79 Puggoon Road, Beryl, NSW 2852.	Around 20-25 ha covering part of two properties, being Lots 101 and 102 of Deposited Plan 1203462 at 696 Castlereagh Highway and 79 Puggoon Road, Beryl, NSW 2852.
Solar farm	Generation capacity of approximately 200 MW. The solar farm will comprise solar modules, mounting structures, inverter stations, weather stations, internal access tracks and associated cabling.	No longer proposed.

Table 2.1 Comparison of BHRP physical layout and design

Element	Project described in Scoping Report, March 2022	Proposed refinements, March 2023
Battery energy storage system	Capacity of approximately 200 MW and up to two hours of storage.	Increase in capacity to approximately 408 MW and up to two hours of storage.
Facility substation and grid connection	A facility substation connected to the solar farm and BESS inverter stations as well as a switchyard will be established to connect the project to the transmission network. The proposed switchyard is adjacent to the existing 330 kV transmission line network and will be constructed and operated by TransGrid. No new transmission lines are expected for the project.	No change.
Administration and control area	Facility substation and control rooms, BESS, administration buildings with amenities, O&M workshops, and car parking sufficient for employees and contractors.	No change.
Site access	Primary and secondary access points on Puggoon Road.	Primary access from the Castlereagh Highway, given the reduction in project footprint and ecological constraints along Puggoon Road. A new access will be constructed and will replace the existing access to the property on the Castlereagh Highway (see Figure 2.1).
Construction	Construction of the project expected to be completed over a period of up to 36 months, comprising 12-18 months for the solar component and 12-18 months for the BESS component, depending on construction staging, and may be completed in two stages.	Construction of the project over a period of: • up to 20 months, if undertaken in a single stage, or • if staged, an initial construction period over 13-18 months, followed by a second construction period of 12-15 months (commencing approximately 6-12 months after the initial stage).
Construction workforce	Peak workforce of up to 400 employees and contractors.	Peak workforce of up to 100 employees and contractors if constructed in a single stage, with a reduced peak of 80 employees and contractors for a staged construction scenario.
Operation workforce	Workforce of 5-8 full-time staff throughout operations. Regular maintenance will be required throughout the operational life of the project.	No permanent workforce on site during operations. Approximately 6-10 staff would complete routine operations and maintenance activities approximately one full week each month throughout the operational life of the project.
Capital investment value	Greater than $30 million	Greater than $30 million

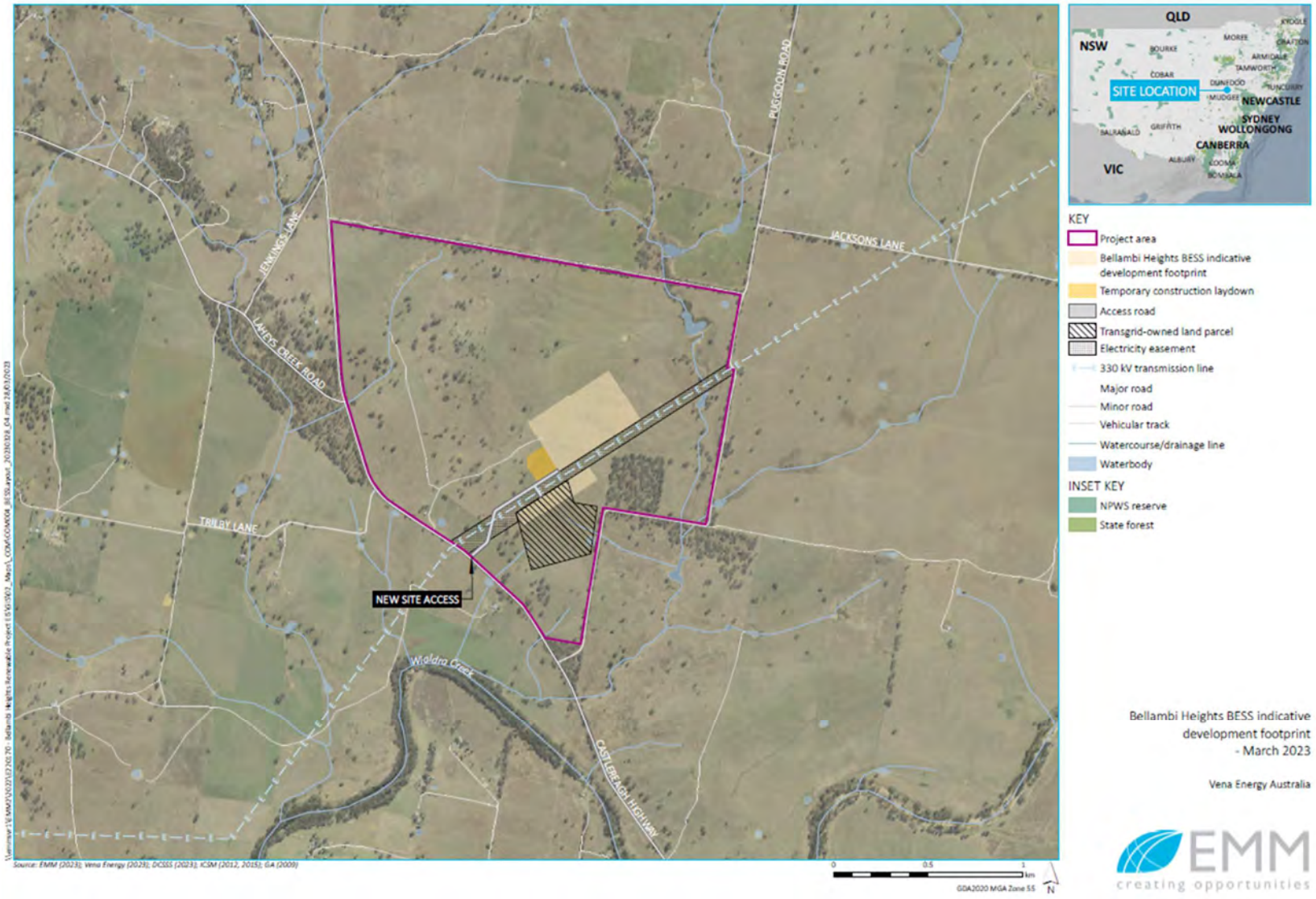

Figure 2.1 **Bellambi Heights BESS – indicative development footprint March 2023**

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3 Stakeholder consultation

VEA has informed neighbours and the local community, Mid-Western Regional Council and other stakeholders of the recent project refinements, with a view to minimising confusion and informing the community of the outcomes of design refinements.

During 2022, VEA continued to complete environmental investigations to support the EIS. Engagement with the community occurred during October and November 2022 and included:

- meeting with Mid-Western Regional Council's General Manager and Director of Development on 10 November 2022;
- project website updates informing stakeholders that EIS investigations and project refinement was underway and that a project community information session would be held on Saturday 26 November 2022;
- a personally addressed letter and project update newsletter was sent to eight landowners who directly adjoin the project site, or through EIS technical assessments are deemed to be directly affected by the project in ways other than proximity (i.e. visual amenity, traffic). These stakeholders were also offered a personal, in-person or online project briefing and informed of a project community information session to be held on Saturday 26 November 2022;
- a personally addressed letter and project update newsletter was sent to 66 landowners who do not directly adjoin the site, but live within 3km of the project site. These stakeholders were also offered a personal, in-person or online project briefing and informed of a project community information session to be held on Saturday 26 November 2022;
- a project update newsletter was sent to 1,597 recipients in the broader community (i.e. all households in the suburbs of Beryl and Gulgong) which included details of a project community information session to be held on Saturday 26 November 2022;
- a project community information session was held on Saturday 26 November 2022 at the Gulgong Memorial Hall from 9am to 1pm, and was attended by two community stakeholders;
- face to face meetings with four stakeholders surrounding the project site on 5 December 2022 and completion of photography to inform the visual assessment.

Following the refinement of the project in early 2023, VEA engaged with key stakeholders to inform them of the project refinements, including:

- meeting with Mid-Western Regional Council's General Manager and Director of Development on 7 February and 8 March 2023;
- phone call to DPE with a follow up email sent on 8 February 2023;
- phone calls to four affected stakeholders surrounding the project site on 8 February 2023;

- letters to 69 stakeholders within 3 km of the site posted 14 February 2023 via express registered post;
- VEA and EMM hosted a stall for the project at the Gulgong Show on Saturday 18 February 2023. Across a 7.5 hour period, the project team engaged with 23 stakeholders including directly affected landowners (3), elected representatives (1), business owners (5), industry groups (2) and residents from Beryl, Gulgong and Mudgee (12). Refinements to the project were specifically discussed and a plan (as per Figure 2.1) showing the revised project footprint was available for review and discussed with stakeholders.

Neighbours, broader community stakeholders and Mid-Western Regional Council all provided positive feedback on the refinements, in particular regarding the reduced visual impacts. VEA is currently in the process of informing other key stakeholders including government agencies that provided input to the SEARs.

4 Environmental assessment

The project refinements have resulted in the removal of the solar generation component of the original project, resulting in a substantive reduction in the project footprint from in the order of 304 ha, to approximately 20-25 ha. This has resulted in reduced environmental impacts based on the removal of a substantial area of land from the project footprint that will no longer be impacted. As the BESS and switchyard components have not materially changed, the level of assessment proposed for the refined project are considered adequate and comprehensive. Commentary on the level of assessment proposed for environmental matters is provided in Table 4.1. Assessment would continue to be in accordance with the SEARs.

Table 4.1 Level of assessment of environmental matters

Matter	Level of assessment – Scoping Report, 2022	Proposed level of assessment based on project refinements, March 2023	Comments
Amenity – Visual	Detailed	Detailed	The project refinements will result in a reduction in visual impacts for the project due to the reduced footprint and removal of solar panel infrastructure.
Biodiversity	Detailed	Detailed	The project refinements will result in a reduction in biodiversity impacts for the project due to the reduced footprint.
Heritage – Aboriginal	Detailed	Detailed	The project refinements will result in a reduction in Aboriginal heritage impacts for the project due to the reduced footprint.
Traffic	Detailed	Detailed	The project refinements will result in a reduction in traffic impacts for the project due to the reduced construction period and traffic generation.
Hazards and risks	Standard	Standard	The project refinements will result in a reduction in hazard and risk impacts for the project due to a reduction in the scale and nature of the development.
Heritage – Historical	Standard	Standard	The project refinements will result in a neutral change in historical heritage impacts for the project.

Table 4.1 Level of assessment of environmental matters

Matter	Level of assessment – Scoping Report, 2022	Proposed level of assessment based on project refinements, March 2023	Comments
Social and economic	Standard	Standard	The project refinements will result in a reduction in social and economic impacts for the project due to the reduced footprint, and associated reduction in amenity and construction-related impacts, reduced construction workforce and reduced visual impacts.
Land	Standard	Standard	The project refinements will result in a reduction in land impacts for the project due to the reduced footprint.
Water	Standard	Standard	The project refinements will result in a reduction in water impacts for the project due to the reduced footprint.
Amenity – Noise and vibration	Standard	Standard	The project refinements will result in a reduction in noise and vibration impacts for the project during the construction period.
Air quality	Standard	Standard	The project refinements will result in a reduction in air quality impacts for the project during the construction period.

5 Closing

This letter outlines the project refinements to the Bellambi Heights Renewable Project (SSD-33344237), now to be known as the Bellambi Heights Battery Energy Storage System. The refinements to the project represent an orderly and logical response to the constraints identified during the process of environmental investigations undertaken as part of the preparation of the EIS.

Key stakeholders have been engaged and informed of the refinements and have responded positively to the project refinements. The SEARs issued in May 2022 will still substantively apply to the project.

VEA and EMM are working towards finalising the EIS based on the project refinements, with an EIS to be submitted in the first half of 2023.

Yours sincerely

Kate Cox
Associate Environmental Scientist

Michelle Veney
Associate Director