

Our ref: Moree Battery Energy Storage System (DA25/6636)

Mr Jeremy Moore  
The Trustee for AE BESS 2 Unit Trust  
52 Alfred Street  
NORTH SYDNEY NSW 2061

**Attention: Ms Sarah Hillis**

via email: [jeremy.moore@avenisenergy.com.au](mailto:jeremy.moore@avenisenergy.com.au); [sarah.h@nghconsulting.com.au](mailto:sarah.h@nghconsulting.com.au)

12 June 2025

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**Subject: Moree Battery Energy Storage System - Request for Information**

Dear Mr Moore

I refer to the above development application and the Department of Planning, Housing and Infrastructure's (the Department) previous correspondence dated 4 June 2025 which requested the provision of a response to issues raised in government advice received during the public exhibition period.

Advice has now been received from Moree Plains Shire Council (Council) and Transgrid and is appended to this correspondence for your consideration.

In addition to responding to the advice already received, you are required to submit additional information that addresses the issues identified by the Department in **Attachment 1** and respond to the matters raised by Council. Please include your response to the Department's issues and government authority advice, including those matters raised by Council, in a consolidated response.

If you have any questions, please contact Sally Munk, Principal Planner, on 9274 6431 or via email at [sally.munk@planning.nsw.gov.au](mailto:sally.munk@planning.nsw.gov.au).

Yours sincerely,



**Joanna Bakopanos**  
**A/Director, Industry Assessments**  
as delegate for the Planning Secretary

*Attached:*

- *Department's Request for Further Information*
- *Correspondence from Moree Plains Shire Council and Transgrid*

## Attachment 1

### Request for Further Information

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#### 1. Proposed Development

##### Scope of Development Application

The second figure in Section 1.2 (un-numbered figure) shows the construction extent as including the site access driveway to Bullus Driveway. However, the development description in Table 2-1 does not include the site access driveway in the scope of the development application (DA).

##### **Recommendations:**

- **The site access driveway should be part of the DA and included in the project description.**

##### Connection to the Moree Bulk Supply Point Substation

Section 2.4.5 states that Transgrid would be responsible for the works associated with the connection to the Moree Bulk Supply Point Substation. The relevant assessment pathway for these works has not been stated.

##### **Recommendations:**

- **Please confirm the assessment pathway for these works.**

##### Battery Replacement

Section 2.7 states that the battery component of the proposal would need to be replaced every 10-15 years. The SEE does not provide any details around how this will be carried out and what this would involve.

##### **Recommendations:**

- **Provide further details regarding the process for replacing the batteries, including traffic generation and anticipated timeframes (i.e. does battery replacement occur over a dedicated maintenance period, or progressively over time, as required).**

#### 2. Noise

##### Relative Increase in Noise

Section 3.3 and the Construction and Operational Noise and Vibration Impact Assessment (NVIA) at Appendix C do not include an assessment of the relative increase in noise as a result of the proposal, despite Bullus Drive and Narrabri Road being arterial roads.

##### **Recommendations:**

- **If Bullus Drive and Narrabri Road are classified as arterial roads, the NVIA must include an assessment of the relative increase in road traffic noise. This must be assessed in accordance with the section 2.4 of the EPA's Noise Policy for Industry.**

##### Road Traffic Noise

The estimated construction traffic volumes during peak construction outlined in Table 7-1 of the NVIA at Appendix C are less than the peak construction traffic volumes predicted in Table 6 of the Traffic Impact Assessment (TIA) at Appendix F. Construction traffic noise impacts may be underestimated.

##### **Recommendations:**

- **A revised assessment of construction traffic noise must be carried out using the traffic predictions in the TIA.**

### **3. Earthworks**

Section 3.14 states the site is to be filled up to a maximum of 1.8 metres to achieve the necessary stormwater management arrangements. Section 6.1.2.8 of the Moree SAP Delivery Plan states that earthworks should be cognisant of the soil type in the locality and include relevant geotechnical investigations to inform design and construction. The Delivery Plan requires the DA to be supported by an Interim Geotechnical Design Advice Letter (IGDA) informed by relevant geotechnical testing.

Council has also requested additional information be provided regarding cut and fill and has requested a geotechnical report.

#### **Recommendations:**

- **A geotechnical report and IGDA is required to support the DA consistent with the requirements of the Moree SAP Delivery Plan and to address the comments made by Council.**

### **4. Stormwater**

Section 3.14 states that the pollution reduction target for Total Nitrogen will not be met. In lieu of this, the stormwater treatment approach includes several mitigation measures to reduce nitrogen generation from the development. The commentary does not provide any details of the effectiveness of these measures or whether this approach has been successfully implemented elsewhere.

The Department notes the Moree Special Activation Precinct Master Plan states stormwater run-off at the Precinct boundary must achieve a neutral or beneficial effect on water quality (in terms of annual pollutant loads). The Moree SAP Delivery Plan states the Moree Special Activation Precinct Master Plan precinct-wide pollution load reduction target for Total Nitrogen is 45%.

Council has also requested additional information be provided to demonstrate how the development will achieve the pollution reduction target of 45% for Total Nitrogen.

#### **Recommendations:**

- **Further details are required to justify the proposed approach to minimise and mitigate Total Nitrogen discharge from the development site. This should include an evidence-based prediction of the percentage reduction this approach will achieve.**
- **If satisfactory justification cannot be provided for the alternate approach to managing Total Nitrogen, the stormwater management strategy must be revised to demonstrate how the development will achieve a pollution reduction target of 45%, in line with the comments made by Council.**