

11 July 2025

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Attention: General Manager
Narromine Shire Council
PO Box 115
Narromine NSW 2821

SLR Project No.: 630.032409.00001

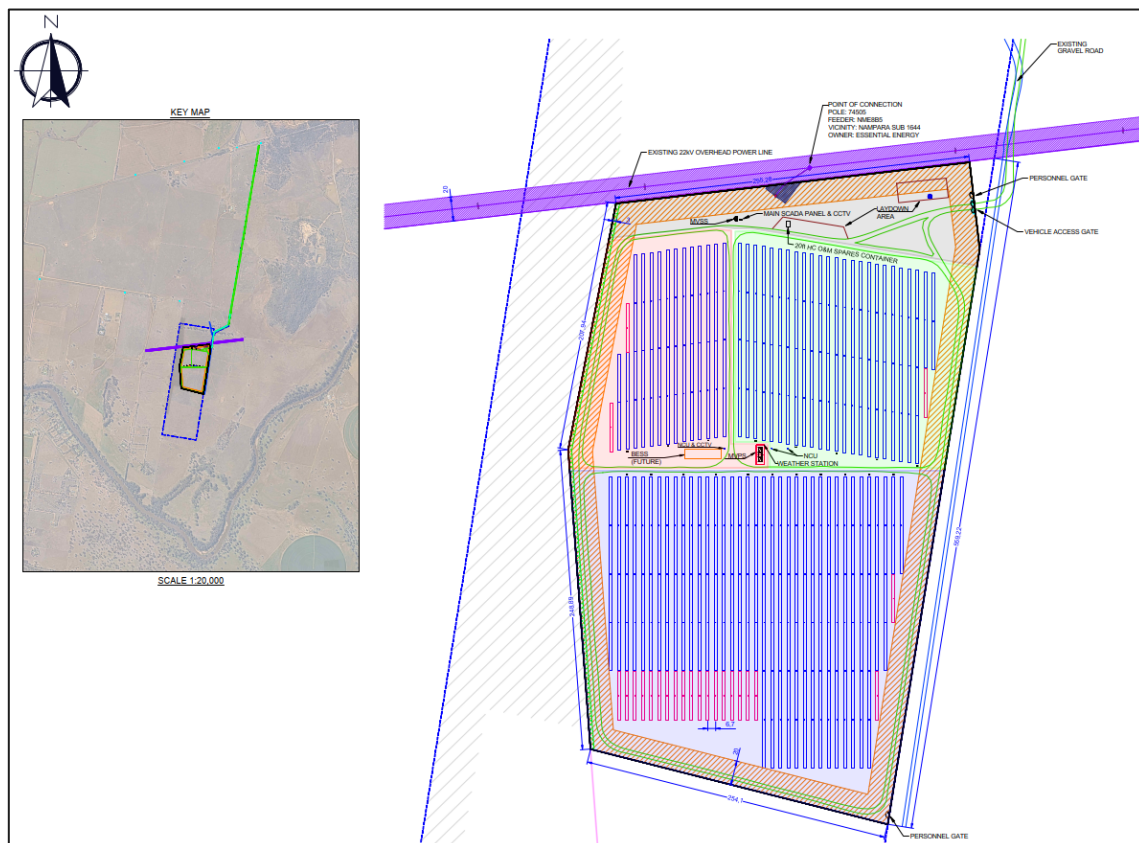
RE: Statement of Environmental Effects
s4.55(2) Modification to DA2019/47
6 Euromedah Road, Narromine NSW 2821

1.0 Introduction

SLR Consulting Australia Pty Ltd (SLR) acts on behalf of Narromine Renewable Energy Project Pty Ltd in lodging this Section 4.55(2) modification application to Narromine Shire Council (Council) to modify DA2019/47. The proposal includes modifications to the Plans to facilitate the addition of a *battery energy storage system* (BESS) to the approved Solar Farm at 6 Euromedah Road, Narromine NSW 2821.

Refer to Appendix A and Figure 1 for the endorsed site layout which includes the four (4) BESS containers in the area circled.

Figure 1 Proposed Amended Site Plan



Section 4.55(2) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) states that a consent authority may, on application, modify a development consent involving substantially the same development and minimal environmental impact.

1.1 Background

DA2019/47 for *Electricity Generating Works – 5MW Solar Farm* was approved by the Regional Planning Panel (RPP) on 12 November 2019. It is understood one submission was received during the exhibition, which related to glare, however this submission was withdrawn once an agreement on a shade cloth was reached between the submitter and applicant.

Public records were not available for DA2019/47.1.

DA2019/47.2 was approved by Council on 4 May 2021 to modify the conditions of consent, it does not appear there were any physical changes to the proposed physical works or use of the site. Construction of the approved solar farm has commenced at the site, which is evident in the aerial imagery (refer to Figure 1).

1.2 Site Details

6 Euromedah Road, Narromine (The site) is located east of the township of Narromine, within the Local Government Area (LGA) of Narromine Shire. The site is legally identified as Lots 41 and 46 of DP 752581. The site is irregularly shaped and covers an area of 162.34 hectares.

The site's topography is relatively flat and there are no watercourses running through the site. The site itself is mostly cleared of vegetation with a small cluster of trees located in the north westerly quadrant of the site, and on the eastern border along the Macquarie River.

Refer to Figure 2 and Figure 3 for details of the site and its surrounds.

Figure 2 Site Aerial (Source: Nearmap dated 29 May 2025)

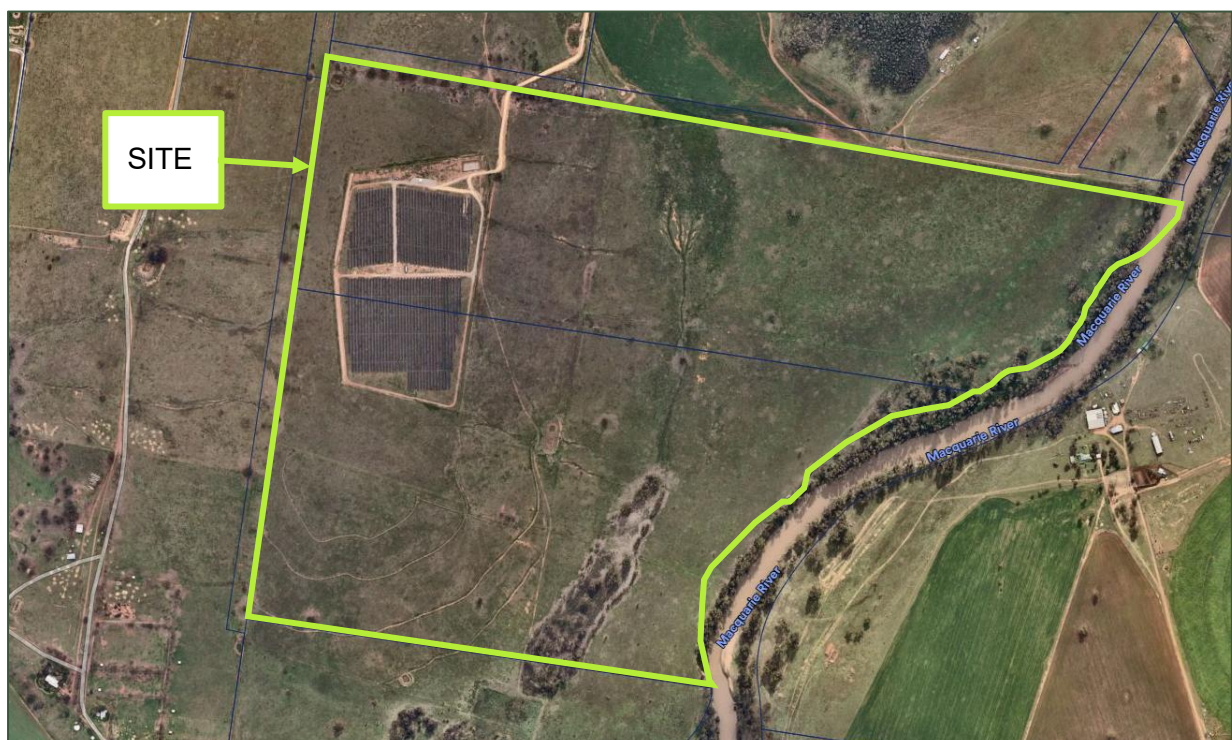
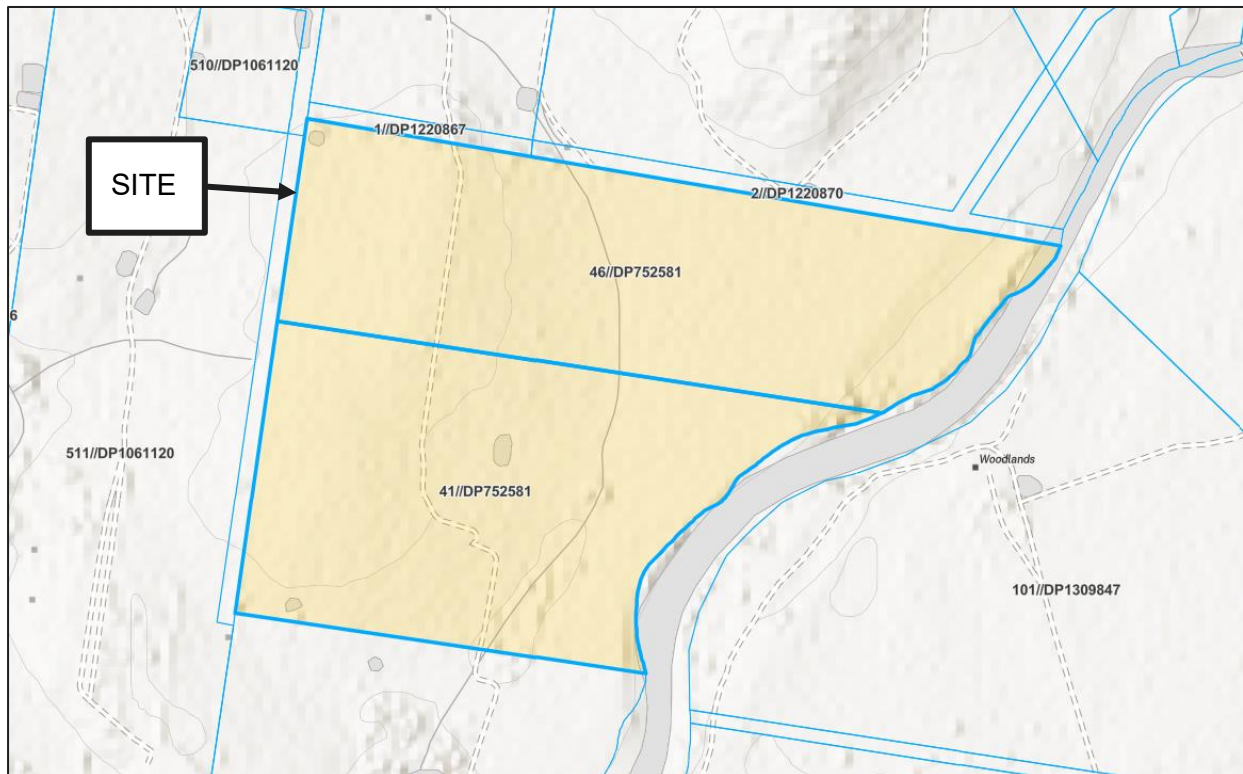


Figure 3 Site Cadastre (SDT Explorer)



2.0 Proposal

The proposal seeks to modify the approved Plans to incorporate a Battery Energy Storage System (BESS) into the existing Solar Farm development. The BESS will consist of four standalone battery units and ten DC-DC converters.

The dimensions for the proposed battery units are:

- 6.1 m (L) × 2.4 m (W) × 2.9 m (H), indicative figure shown in Figure 4.

Figure 4 BESS Container



And the DC converters are:

- 1.0 m (L) × 1.0 m (W) × 2m (H), indicative shown in Figure 5.



Figure 5 DC-DC Converter



This addition is intended to enhance the operational efficiency and energy dispatch capabilities of the Solar Farm by enabling the storage and regulated release of generated electricity. The proposed infrastructure will be installed within the existing site boundaries and will utilise current access and service infrastructure, minimising the need for additional construction or site disturbance.

2.1 Plan Amendments

The updated plan sheets are detailed below, and new plan details are marked in red:

Plan/Report Title	Reference No	Revision	Prepared by	Date
Site Layout and Detail	10009-CIV-03-003	A1	MPower	02/12/2020

Justification

The proposed modification seeks approval under Clause 4.55(2) of the *Environmental Planning and Assessment Act 1979*, on the basis that the development as modified will remain substantially the same as the development originally approved.

The proposed BESS is ancillary to the approved solar farm, maintains the use as *electricity generation works* and will be integrated within the existing development footprint. The BESS will be constructed within the boundaries of the approved site and will utilise existing access roads and infrastructure, thereby avoiding the need for additional works.

The modification does not alter the scale, intensity, or character of the approved development. It will not result in any new or increased environmental impacts. The BESS will



be located in an area already managed for solar infrastructure and will not affect the site's visual character or surrounding land uses.

The inclusion of the BESS will enhance the functionality, reliability, and efficiency of the existing renewable energy system, while maintaining consistency with the originally approved purpose and land use. Accordingly, the proposed modification satisfies the requirements of Clause 4.55(2), as it does not result in a development that is materially different from that originally approved.



3.0 Relevant Legislation and Planning Controls

3.1 Environmental Planning and Assessment Act 1979

The appropriate approval path for the proposed modification is a s4.55(2) under the EP&A Act.

(2) Other modifications *A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if—*

(a) it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all), and

Comment: The proposed development is substantially the same as the approved development. The consent was originally granted for a solar farm and associated infrastructure, under the parent use of *electricity generation works*. The proposed changes involve the addition of four BESS units to support the solar farm.

(b) it has consulted with the relevant Minister, public authority or approval body (within the meaning of Division 4.8) in respect of a condition imposed as a requirement of a concurrence to the consent or in accordance with the general terms of an approval proposed to be granted by the approval body and that Minister, authority or body has not, within 21 days after being consulted, objected to the modification of that consent, and

Comment: The proposed does not seek to amend any conditions imposed by the Regional Planning Panel and this modification can be approved by Council as the consent authority.

(c) it has notified the application in accordance with—

(i) the regulations, if the regulations so require, or

(ii) a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and

Comment: In accordance with Narromine Shire Council's Community Engagement Strategy (2024), the proposed S4.55(2) modification application will be required to be notified.

(d) it has considered any submissions made concerning the proposed modification within the period prescribed by the regulations or provided by the development control plan, as the case may be.

Subsections (1) and (1A) do not apply to such a modification.



Comment: It is acknowledged that the planning authority must review any objections or comments submitted by interested parties concerning the modification prior to making a decision on the modification.

3.2 State Environmental Planning Policy (Transport and Infrastructure) 2021

3.2.1 Chapter 2 Infrastructure

Division 4 Electricity generating works or solar energy systems

The aim of SEPP (Transport and Infrastructure) 2021 is to provide greater flexibility in the location of infrastructure and service facilities. This SEPP identifies certain electricity generating works that are permitted with consent, without consent, as exempt development, as complying development and works that are prohibited.

Clause 2.36 Development permitted with consent

Development for the purpose of electricity generating works may be carried out by any person with consent on the following land—

- a) in the case of electricity generating works comprising a building or place used for the purpose of making or generating electricity using waves, tides or aquatic thermal as the relevant fuel source—on any land,*
- b) in any other case—any land in a prescribed non-residential zone.*

prescribed non-residential zone means any of the following land use zones or a land use zone that is equivalent to any of those zones—

- (a) RU1 Primary Production,*
- (b) RU2 Rural Landscape,*
- (c) RU3 Forestry,*
- (d) RU4 Primary Production Small Lots,*
- (e) E4 General Industrial,*
- (f) E5 Heavy Industrial,*
- (g) IN1 General Industrial,*
- (h) IN2 Light Industrial,*
- (i) IN3 Heavy Industrial,*
- (j) IN4 Working Waterfront,*
- (k) SP1 Special Activities,*
- (l) SP2 Infrastructure,*
- (m) W4 Working Waterfront.*

The site is zoned RU1 Primary Production, a prescribed non-residential zone, the proposed solar farm and associated electricity generating works are permitted with consent under Clause 2.36 of SEPP (Transport and Infrastructure) 2021.



3.3 State Environmental Planning Policy (Resilience and Hazards) 2021

3.3.1 Chapter 3 – Hazardous and Offensive Development

This SEPP requires the consent authority to consider the potential contamination status of the land prior to approving a development.

The management measures identified within the approved DA will continue to serve the site and will be enacted as part of this modification.

3.4 Narromine Local Environmental Plan 2011

The site is located within the Narromine LGA and is subject to the Narromine LEP 2011. The site is zoned RU1 Primary Production under the LEP.

Zone RU1 Primary Production

1 Objectives of zone

- *To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.*
- *To encourage diversity in primary industry enterprises and systems appropriate for the area.*
- *To minimise the fragmentation and alienation of resource lands.*
- *To minimise conflict between land uses within this zone and land uses within adjoining zones.*

2 Permitted without consent

Environmental protection works; Extensive agriculture; Forestry; Home occupations; Roads; Water reticulation systems

3 Permitted with consent

Agritourism; Air transport facilities; Airstrips; Animal boarding or training establishments; Aquaculture; Bed and breakfast accommodation; Boat launching ramps; Boat sheds; Building identification signs; Business identification signs; Camping grounds; Cellar door premises; Cemeteries; Community facilities; Correctional centres; Depots; Dual occupancies (attached); Dwelling houses; Eco-tourist facilities; Environmental facilities; Extractive industries; Farm buildings; Farm stay accommodation; Flood mitigation works; Freight transport facilities; Heavy industrial storage establishments; Heavy industries; Helipads; Home-based child care; Home businesses; Home industries; Home occupations (sex services); Industrial training facilities; Information and education facilities; Intensive livestock agriculture; Intensive plant agriculture; Jetties; Landscaping material supplies; Mooring pens; Moorings; Open cut mining; Recreation areas; Recreation facilities (major); Recreation facilities (outdoor); Roadside stalls; Rural industries; Rural workers' dwellings; Sewerage systems; Veterinary hospitals; Water recreation structures; Water supply systems

4 Prohibited

Any development not specified in item 2 or 3

The development is defined as *electricity generating works*. . This is prohibited in the RU1 zone and relies on the provisions of the State Environmental Planning Policy (Transport and Infrastructure) 2021.



Clause 6.1 Earthworks

The proposed modification will not impact the approved earthworks at the site.

The proposed modification results in the approved development still being consistent with all other LEP clauses applicable to the site.

Clause 6.4 Terrestrial biodiversity

The site is partially mapped as Environmentally Sensitive Land on the Terrestrial Biodiversity Map. The proposed modification does not result in the removal of any vegetation or disturbance to fauna habitat, it is unlikely to have any adverse impact on the ecological value and significance on the biodiversity of the site.

Clause 6.6 Groundwater vulnerability

The site is mapped Vulnerable Land on the Groundwater Vulnerability Map. The proposed BESS modification does not involve the use, storage, or disposal of any solid or liquid waste or chemicals. The system is a closed, self-contained unit and designed in accordance with best practice environmental and engineering standards to prevent any leakage or infiltration. It poses no risk of groundwater contamination or impact on groundwater-dependent ecosystems.

3.5 Narromine Shire Council Development Control Plan 2011

The Narromine Shire Council DCP 2011 applies to the site. The minor nature of the modifications proposed do not impact the compliance of the development with relevant DCP controls as assessed under the original application and thus do not warrant reassessment.

4.0 Environmental Assessment & Justification

The following is an assessment of the environmental effects of the proposed development as described in the preceding sections of this SEE. The assessment considers only those matters under Section 4.15(1) of the EP&A Act 1979 that are relevant to the proposed development.

4.1 Noise

The closest residential receiver is approximately 760m to the south west from the nearest point of the development. The BESS units and inverters are expected to generate minimal operational noise, primarily limited to low-level hum from cooling systems. This is expected to be negligible to the nearest residential receiver and noise will be further buffered by solar panels which surround the units. Construction noise will be short-term and minimal as the units are predominantly constructed off site.

4.2 Visual Impact

As shown in Figure 1, the BESS units and associated converters are centrally located within the existing solar panel arrays. The solar trackers have a hub height of approximately 1.5 m, with a maximum panel height of around 2.9 m at full tilt. The height of the BESS units will not exceed that of the solar panels. The site is enclosed by 1.8 m high security fencing, and landscape screening is required along the western boundary as a condition of consent.



Accordingly, the proposed modification is not expected to result in any additional visual impacts beyond those already approved.

4.3 Bushfire

The site is mapped as being within both Category 3 and Vegetation Buffer on the bushfire prone land map. A Bushfire Assessment Report was submitted with DA2019.47.2. As there are no habitable buildings on site, the report has recommended a 10-metre APZ around all infrastructure on site which was subsequently conditioned. Additionally, the risk associated with the BESS is considered low due to the safety measures incorporated within the design, including the installation of fire suppression systems within the containers, which detect and control fire events promptly to minimise potential hazards to the site and surrounding environment.

The proposed BESS installation has been carefully designed to minimise bushfire risk through appropriate siting, construction materials, and operational controls. The project team is committed to ongoing compliance with all relevant bushfire safety regulations and will liaise with FRNSW and the NSW Rural Fire Service as required during the commissioning and operational phases.

4.4 Traffic, Carparking and Access

A Construction Traffic Management Plan (CTMP) was prepared for DA2019.47.2, which addressed the impacts of construction to the surrounding road network, particularly for the use semi-articulated vehicles. It was determined that the construction of the solar did not adversely impact the local road network capacity.

The proposed modification will not impact the original assessment, and it is considered that any further construction involved is minimal compared to the wider solar farm construction requirements and will not adversely impact the local road network capacity.

4.5 Waste Management

The proposed modification will have negligible impact on construction waste at the site and will not produce any operational waste.



5.0 Conclusion

The proposed BESS addition is minor in nature and does not change the overall function of the approved development. It is considered that the proposed modification will not result in any additional significant impacts than those previously considered and approved by Council.

It is considered that the changes are in accordance with the intent of the consent and there are no detrimental impacts resulting from this amendment. Therefore, given the merit of the proposal and the absence of any significant adverse impacts, the modification is considered to be worthy of Council's support.

Yours sincerely,

SLR Consulting Australia

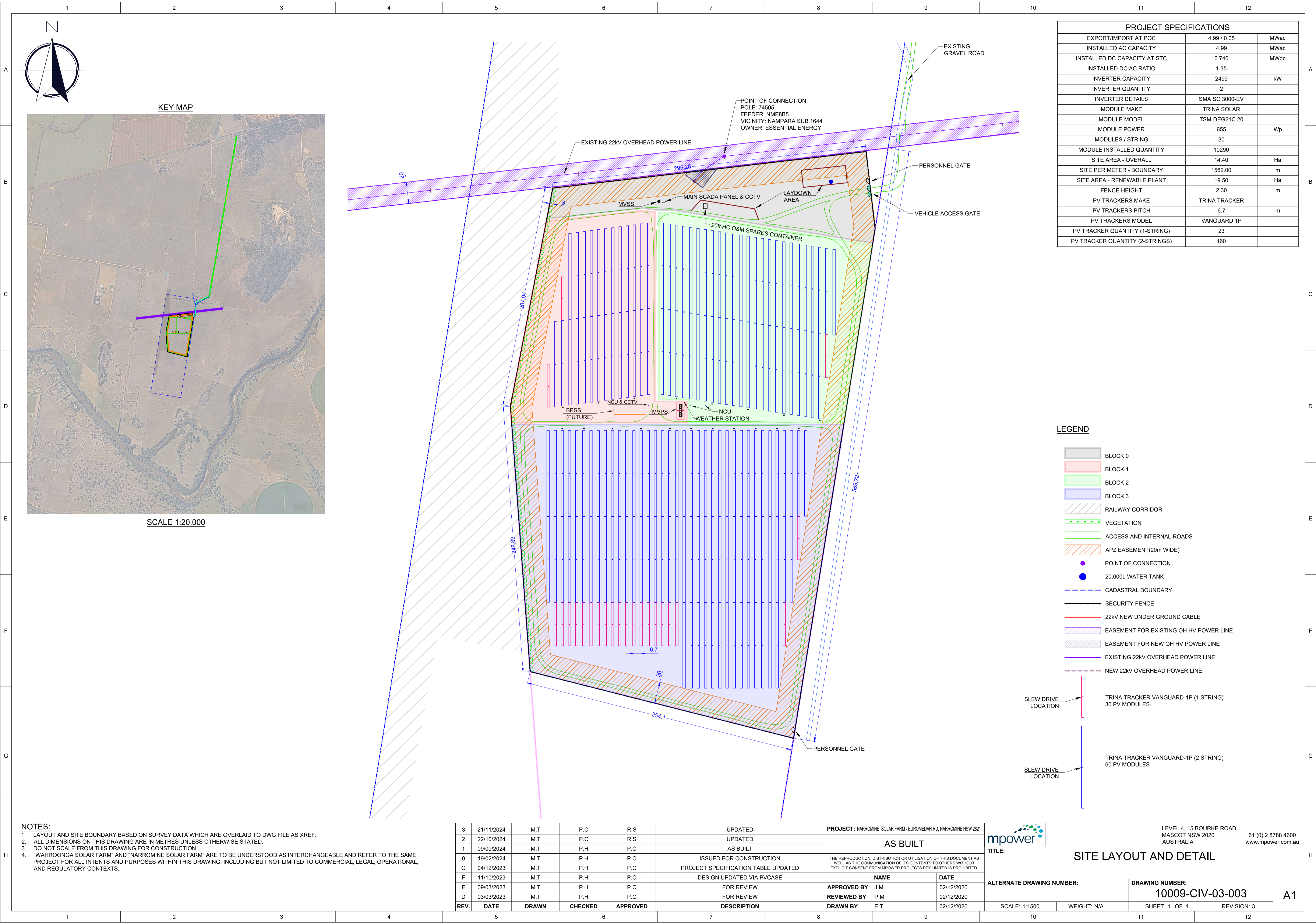


David Cant

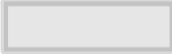

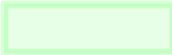










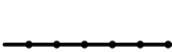



Project Consultant – Planning
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Appendix A Architectural Plans





LEGEND

	BLOCK 0
	BLOCK 1
	BLOCK 2
	BLOCK 3
	RAILWAY CORRIDOR
	VEGETATION
	ACCESS AND INTERNAL ROADS
	APZ EASEMENT(20m WIDE)
	POINT OF CONNECTION
	20,000L WATER TANK
	CADASTRAL BOUNDARY
	SECURITY FENCE
	22kV NEW UNDER GROUND CABLE
	EASEMENT FOR EXISTING OH HV POWER LINE
	EASEMENT FOR NEW OH HV POWER LINE
	EXISTING 22kV OVERHEAD POWER LINE
	NEW 22kV OVERHEAD POWER LINE


SLEW DRIVE LOCATION

TRINA TRACKER VANGUARD-1P (1 STRING)
30 PV MODULES

SLEW DRIVE LOCATION

TRINA TRACKER VANGUARD-1P (2 STRING)
60 PV MODULES

3	21/11/2024	M.T	P.C	R.S	UPDATED	PROJECT: NARROMINE SOLAR FARM - EUROMEDAH RD, NARROMINE NSW 2821 AS BUILT
2	22/10/2024	M.T	P.C	R.S	UPDATED	
1	09/09/2024	M.T	P.H	P.C	AS BUILT	
0	19/02/2024	M.T	P.H	P.C	ISSUED FOR CONSTRUCTION	
G	04/12/2023	M.T	P.H	P.C	PROJECT SPECIFICATION TABLE UPDATED	
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