State code 27: Battery storage facility development

Planning guideline State code 27: Battery storage facility development provides direction on how to address this code.

Table 27.1: Material change of use

Performance outcomes	Response
Areas of high ecological value and associated wildlife habitats	
PO1 Development is located, sited and designed to ensure that the following are protected from adverse impacts: • **protected wildlife** and associated habitats; and • areas of **high ecological value**.	**Complies with PO1 (refer to section 7.1.6.1 of the report for detailed discussion)** 4 Elements have undertaken both desktop and field surveys (February 2024 and February 2026) in accordance with the relevant methodology outlined in Appendix 1. A copy of the report is included within Attachment 4. The desktop and field surveys concluded that the development is located, sited and designed: • Outside of high ecological value aeras (i.e. MSES), including any mapped Regulated Vegetation (category A, B C and R), Wildlife Habitat and Watercourses, providing a minimum setback a of 50m to lot boundaries and 100m to built infrastructure. • Appropriately setback by 100m minimum to mapped waterway centrelines (even where not MSES). • Setback 140m minimum to protected wildlife areas and associated habitats. • Minimises the clearance of existing (non-remnant) vegetation by being located in a part of the site that is considered to be highly disturbed and not suitable for supporting wildlife habitat given its lack of native woody vegetation; • Is located outside any areas identified by the on-ground assessment as likely to or potentially containing koala habitat and/or threatened species.

Performance outcomes	Response
	Further, the development will be managed through: • Erosion and Sediment Control Plan (to manage offsite and downstream water quality to areas of high ecological value) • Environmental Management Plan for construction and management of the site that will ensure use of non-persistent and non-residual herbicides to manage weeds; • Construction of in stream works across identified waterways will meet accepted development criteria (requiring best practice) to minimize disturbance • Stormwater Management Plan that confirms all stormwater is contained on site before discharge which minimizes the potential for any impacts As such, no Offsets or specific management for particular matters is required for the project. Due to the presence of Koala Habitat, the development was referral to the Department of Climate Change, Energy, the Environment and Water for actions that may impact on Matters of National Environmental Significance, based on the material contained Attachment 4. The Minister determined that the project is 'Not a Controlled Action' on 26 March 2026. A copy of this letter is provided in Attachment 21.
Risk mitigation	
PO2 Development is designed, sited and constructed to ensure that risks from physical hazards, chemical hazards and battery failure hazards are avoided and/or mitigated with respect to: • **human health** and **safety;** and • the built and natural **environment**.	**Complies with PO2 (refer to section 7.1.6.1 of the report for detailed discussion)** An assessment of the project in relation to identification of hazardous risks (physical, chemical and battery failure) to the site and surrounding area, as well as how these risks can be mitigated and managed through appropriate design, siting, construction and operations management was undertaken by Arriscar and is included in Attachment 5. Firstly, the development has been designed and sited to physical avoid areas of natural risk (such as bushfire, erosion, flood) and are appropriately separated from sensitive environments, so that under

Performance outcomes	Response
	normal operating conditions, there is a low risk of incidents. Secondly, the technology proposed minimises the potential for incidents through various layers of detection and shut down systems to reduce the risk for incidents to occur. The design, siting and technical standards of the components further minimize the potential for explosion and contamination risk by having a fully contained system (encased in steel), with bunds for each container and then bunds for the entire development site to ensure any potential contamination can be contained. Appropriate access to the site (constructed to a sufficient standard) as well as Operational Emergency Management Plan procedures ensures the development can be operated in a manner that will avoid and/or mitigate any impacts to humans and the built and natural environment. Once operational, an Operational Emergency Safety Management Plan is proposed to be prepared to address specific hazards and ensure mitigation methods are appropriate for human health and safety in the event of an incident. Accordingly, the assessment concludes that the development has been designed, sited and can be operated to ensure that risks from physical, chemical and battery failure hazards are primarily avoided through site design, and can be mitigated with appropriate emergency management plans to ensure safety of human health and built and natural environment health on and adjoining the site.
PO3 Development mitigates the risks of fire, explosion and thermal runaway from battery storage infrastructure.	**Complies with PO3 and PO4 (refer to section 7.1.6.1 of the report for detailed discussion)**
PO4 Development is designed to ensure fire and thermal events can be contained and isolated to prevent escalation and propagation to other developments and uses on and offsite.	Please refer to Fire Safety Study and Risk Assessment prepared by Arriscar within Attachment 5. The risk of both toxic gas emission from thermal runway without ignition and exposure to personnel, as well as fire within a BESS container is considered Low in relation to the specific technology and design of the BESS. This is because there are multiple layers of safety systems embedded into the design so that the thermal radiation, explosion and toxic gas effects of BESS. The facility has been

Performance outcomes	Response
	designed with adequate separation distances between BESS containers and transformers to prevent escalation of incidents and protect adjacent infrastructure. Accordingly, the development has been designed and can be operated to ensure the risks of fire, explosion and thermal runway events can be contained and isolated on site.
Incident response	
PO5 Development is designed to facilitate effective and efficient emergency service access and response in the event of a fire, bushfire (including cleared fire fighting areas at the interface of hazardous vegetation), explosion, contamination leak or any other incident requiring an emergency service response.	**Complies with PO5 (refer to section 7.1.6.1 of the report for detailed discussion)** Please refer to Fire Safety Study and Risk Assessment prepared by Arriscar within Attachment 5. Firstly, the development has been designed to avoid areas of vegetation (i.e. bushfire risk) and are appropriately separated so that under normal operating conditions, there is a low risk of incidents. Secondly, the design, siting and technical standards of the components minimize the potential for explosion and contamination risk by having a fully contained system, with bunds for each container and bunds for the entire development site to ensure any potential contamination can be contained. A future Operational Emergency Management Plan will be prepared as a condition of approval, based on the risk matrix and mitigation measures outlined in the report and in collaboration with relevant Departments and Emergency Service providers. This includes adequate access to the site via Red Hill Road and the proposed access, which will be constructed to an appropriate standard that allows for emergency services to effectively respond to any incidents where required.
PO6 The development: • provides appropriate fire detection, monitoring and notification to the site operator; and • ensures the electrical safety of the facility, in the event of an incident requiring emergency response.	**Complies with PO6 (refer to section 7.1.6.1 of the report for detailed discussion)** Please refer to Fire Safety Study and Risk Assessment prepared by Arriscar within Attachment 5. Each BESS container includes: • Monitoring systems that monitor temperature, voltage, system trip in event of electrical shorts or overheating and fire alarm control panels and local control stations.

Performance outcomes	Response
	• Cooling systems to maintain safe operating temperatures and prevention of overheating; • Fire detection systems including alarms as well as aerosol fire suppression units installed in each container. • Water mist systems can be remotely activated. • Adequate spacing between battery racks and containers to prevent escalation. • Regular and ongoing maintenance for the life of the project. • Combustible gas detectors and exhaust fans ensure rapid removal of toxic gases generated during battery overheating or failure, with dispersion limited to within 11m of the containers and therefore contained on site. The fire control logic for the BESS containers is as follows: • Gas detector sensing 10% LEL of combustible gas will initiate a LEVEL 1 alarm and start the exhaust fan. The fan will not stop until the detector shows < 10% LEL. • In the event of ignition, a smoke detector or heat detector (1-oo-2) will initiate a LEVEL 1 fire alarm in the BMS, activate sounder and VAD for operator intervention. • If both the smoke detector and heat detector are activated, a LEVEL 2 fire alarm is raised in the BMS. Sounder and VAD are activated and aerosol is released (automatically if in AUTO mode or manually from control room. The ventilation fan is stopped to prevent the aerosol being extracted out. • Finally, a dry pipe water sprinkler unit is installed that can be activated once the firewater pump is manually started. The nearest fire brigade is located at Bororen rural fire station. The fire protection and suppression system for the BESS are designed to meet the requirements of NFPA 855 and other Australian Standards listed.
PO7 Development demonstrates that there is capacity to provide a reliable, sustainable and fit-for-purpose water supply.	**Complies with PO7 (refer to section 7.1.6.1 of the report for detailed discussion)** Please refer to Fire Safety Study and Risk Assessment prepared by Arriscar within Attachment X.

Performance outcomes	Response
	There are two 180,000L water tanks, fitted with appropriate fire fighting connections on site. This will be initially filled by water imported to the site, and then maintained through rainfall events and or from surplus water from the two detention basins provided on site for both stormwater and fire fighting purposes if required.
Social impacts	
PO8 Development demonstrates that either: • a **community benefit agreement** has been entered into for development requiring social impact assessment; or • where a **community benefit agreement** has not been entered into, **social impacts** of the development, including workforce accommodation, local business and industry impacts, community health and well-being, are identified, managed, mitigated, counterbalanced and monitored.	**Complies with PO8 (refer to section 7.1.6.1 of the report for detailed discussion)** ERM have completed a Social Impact Assessment, including an assessment of how these impacts will be managed and monitored through future actions and plans, for the life of the project. A copy of this report is included within Attachment 9. Ultimately, this informed a Community Benefit Agreement with Gladstone Regional Council which was executed on 1 April 2026. A copy of the executed CBA is included as Attachment 17. In relation to funding commitments, the CBA requires the project proponent to: a. make a monetary contribution to Council's Community Benefit Fund; b. provide initial 'one-off' funding to a cross section of local community groups; c. commit funding in support of a local community benefit sharing program; and d. commit funding in support of a neighbourhood benefit program. The CBA also confirms the developer's intention to enter into a separate Shared Benefits Agreement with First Nations Peoples. The funding commitments exclusive of payments to First Nations Peoples total more than $215 MWh pa over the 20+ year life of the project, representing total funding of more than $6.8 million (assuming the target nameplate capacity is achieved). Continued Community and Stakeholder engagement will occur as outlined in the Community and Stakeholder Engagement Plan within Attachment 24.

Performance outcomes	Response
Agricultural land	
PO9 Development is located and designed to ensure there is no unacceptable loss of **high-quality agricultural land**.	**Complies with PO9-PO12 (refer to section 7.1.6.1 of the report for detailed discussion)** Refer to Gilbert and Sutherland Agricultural Assessment within Attachment 18. Gilbert and Sutherland have undertaken an Agricultural Assessment for the project which confirms that the site does not contain any high-quality agricultural land as defined. The footprint of the development will impact a maximum of 3.6ha of Class C2 ALC land. There is no quantifiable material loss of produceable agricultural land within the site or locale. That is, there development will not result in an unacceptable loss of high-quality agricultural land.\ There is no stock route on or adjoining the property.
PO10 Development does not fragment **high-quality agricultural land** in a way that restricts connectivity of agricultural land necessary to ensure its ongoing productivity and operation.	
PO11 Development is constructed to maintain the fertility and soil attributes of **high-quality agricultural land** and to enable **decommissioning** at the end of operations to return the land to pre-construction agricultural land productive value.	
PO12 Development on or adjacent to the **stock route network** maintains its operational efficiency and ongoing integrity and function.	
Natural hazards	
PO13 Development is located and sited to avoid **natural hazard** areas including **high erosion risk** areas and **bushfire prone areas.**	**Complies with PO13 (refer to section 7.1.6.1 of the report for detailed discussion)** Natural hazards include flood, bushfire, erosion, storm tide inundation, landslide, earthquake and wind actions. We note that the land is not subject to landslide or storm tide inundation. Please refer to the following reports: • Flood – WMS Flood and Stormwater Assessment – Attachment 6. • Erosion – WMS Flood and Stormwater Assessment – Attachment 6 and Butler Partners Geotechnical Report – Attachment 22. • Bushfire – Eldon Bottcher Bushfire Management Plan – Attachment 11 and Arriscar Fire Safety Study – Attachment 5. The design and layout of the development has been informed through an assessment of the findings of the above reports so that the development avoids natural hazard areas, summarized as follows:

Performance outcomes	Response
	Flood • Overland flows from the Rain on Grid model indicate that flow depths traversing the site are collected and conveyed via the natural channels, with modelled flow depths in the channels typically in the range of 0.5m to 1.5m. Sheet (non-channelised) flow is less than 500mm of the 1% AEP and 0.5% AEP events. • The Switchyard key electrical components are immune to stormwater and riverine flooding up to and including the 0.1% AEP storm event (and therefore out of the 0.2% and 0.5% AEP per Table 8.7.2.3.2 of the planning scheme). Bushfire • Hazardous vegetation which is located at the western and eastern edges of the project site, further than 400m from the development. The development area maintains sufficient setback from established vegetation and will ensure appropriate asset protection areas around the infrastructure to minimize potential for fire spread beyond the property boundary. Erosion • Butler Partners confirmed that the development footprint is outside areas subject to significant erosion, although does contain soils that may be susceptible for dispersion. • Earthworks can be managed through treatment of soils, erosion and sediment control measures and compaction, with various foundation methods to be investigated to minimise operational impacts. • Site specific Environmental Management Plan will also be prepared to manage construction and operational erosion and sediment control. Measures will include locating chemicals appropriately, appropriate management of weeds, minimising impacts of crossings within watercourses and drainage control measures that are designed to accommodate 1 in 10 year ARI in a way that mimics natural flows, in a slow and contained manner. Extreme Weather

Performance outcomes	Response
	• The risk of cyclone damage is low on the site, and very low intensity earthquake impact region.
PO14 Where development cannot be located and sited to avoid **natural hazard** areas (e.g. **Bushfire prone areas**, and **high erosion risk** areas), demonstrate that: • there is no suitable alternative location; • infrastructure can function effectively during and after a **natural hazard** event; and • mitigation measures are implemented to reduce the risk to people, property and the **environment** to a tolerable level.	**Complies with PO14 (refer to section 7.1.6.1 of the report for detailed discussion)** Please refer to the following reports: • Flood – WMS Flood and Stormwater Assessment – Attachment 6. • Erosion – WMS Flood and Stormwater Assessment – Attachment 6 and Butler Partners Geotechnical Report – Attachment 22. • Bushfire – Eldon Bottcher Bushfire Management Plan – Attachment 11 and Arriscar Fire Safety Study – Attachment 5. In relation to flood events - WMS have undertaken a flood assessment (refer to Attachment x), which confirms that the BESS containers and Substation are located on land that is not subject to flood (up to 0.1% AEP) and therefore can function effectively during and after a natural hazard event (flood). For Bushfire – a Bushfire Hazard and Management Plan has been prepared by Eldon Bottcher (refer to Attachment 11), which confirms the development site is located more than 400m from hazardous vegetation, avoiding the risk of bushfire. Appropriate water supply is provided for on site to ensure that there is no damage to the facility in the event of a bushfire in the area. While the site contains soils that are considered 'high erosion risk' and this is managed through earthworks and appropriate land management including permanent erosion and sediment control to minimize impacts. This includes containment of all stormwater and managed dispersion (refer to Attachment 6 and 11) to mitigate the risk of erosion and stormwater discharge in flood events. The site is not subject to storm tide inundation or landslide. Arriscar have undertaken an assessment of both wind (cyclone) and earthquake events and

Performance outcomes	Response
	considers the location has a low susceptibility of such factors (refer to Attachment 5).
PO15 Bushfire hazard is identified and risk is mitigated through strategies for vegetation management, landscape management, water supply, provision of appropriate access, identification of safe assembly or evacuation routes and establishing cleared and maintained asset protection zones around infrastructure that is wholly contained on site.	**Complies with PO15 (refer to section 7.1.6.1 of the report for detailed discussion)** Please refer to Bushfire Management Plan prepared by Eldon Bottcher Bushfire Management Plan – Attachment 11 and Arriscar Fire Safety Study within Attachment 5. All infrastructure are located more than 400m from hazardous vegetation, on land that is primarily cleared. Sufficient area (50m) around the development to the external perimeters of the lot boundaries will also be maintained to further reduce the risk of Bushfire entering the site. Appropriate water supply is provided through provision of 2 x 180,000L water tanks with appropriate fittings in addition to excavated detention basins. Access is provided from a Red Hill Road (a constructed road), with 8m wide access track from a single access point with appropriate signage. All infrastructure and maintenance buffers are wholly contained on site.
Protecting water quality and stormwater management	
PO16 Development: • minimises the disturbance of **high risk soils**; and • manages the release of soil based contaminants.	**Complies with PO16 (refer to section 7.1.6.1 of the report for detailed discussion)** Butler Partners undertook a field investigation with respect to geotechnical attributes of the land, a copy of their report is within Attachment 22. The development proposes earthworks to establish a level pad, which includes earth berms on the western side (the lowest point) and a series of lined detention basins. Earthworks and foundations will be designed to minimize the impact to high risk soils . Essentially, the layout includes an enclosed stormwater system, dispersed amongst grassed areas, or gravel etc. such that the natural flow and stormwater quality will be affected in a minor way by: • Containment through bunding of each BESS container controlled via automated bund valves as well as detention basins as a second layer of containment for any accidental or incident related releases. • During normal operating conditions, clean rainfall is discharged to detention basis and controlled

Performance outcomes	Response
	discharge can occur. • During isolated incidents, all water can be contained on site through bunds and then removed. No piped stormwater drainage network is proposed. The management of stormwater will retain the natural flows from bunded areas (clean water) to a series of detention basins, and ultimately discharged or released as required as part of an incident response rather than stormwater system. Ongoing monitoring will ensure that there is no release of soil based contaminants.
PO17 Development maintains the water quality of receiving waters, **waterways** and wetlands by: • avoiding locating in **waterways** and wetlands; • minimising crossings of and interference with natural drainage lines, farm drainage and irrigation infrastructure; • minimising erosion and sediment run off; • managing drainage control; and • preserving the bank stability of affected **waterways** and drainage lines avoiding non-essential hardening or unnatural modification of the **waterway**.	**Complies with PO17 – PO19 (refer to section 7.1.6.1 of the report for detailed discussion)** The proposed development has been designed to be located outside of any mapped watercourse and is sufficiently setback from all mapped watercourses by a minimum of 50m to property boundaries and 100m to infrastructure as shown in the Proposal Plans within Attachment 1. WMS undertook a flood and stormwater assessment of the site to inform the ongoing management of stormwater. A copy of their assessment is provided for reference in Attachment 6. In summary: • No modification to watercourses is required. There is a single waterway crossing of a Stream Order 1 crossing; and appropriate design of this crossing will be undertaken to meet or exceed the requirements of the Accepted Development Waterway Barrier Works crossing Code either through culvert or bed level crossing to ensure safe egress and minimal impact on the waterway. • The development also includes a constructed berm, which also acts as a bund that ensures appropriate water containment on site. Development prevents the release of contaminants to surface water and groundwater through:
PO18 Development prevents the release of contaminants to surface water or groundwater in the event of an incident, including a fire or explosion.	
PO19 Development minimises interference with overland flow paths.	

Performance outcomes	Response
	• Containment via bunding of each BESS container controlled via automated bund valves as well as lined detention basins as a second layer of containment for any accidental or incident related releases. • During normal operating conditions, clean rainfall is discharged to detention basis and controlled discharge can occur. • During isolated incidents, all water can be contained on site through bunds and then removed. No piped stormwater drainage network is proposed. The management of stormwater will retain the natural flows from bunded areas (clean water) to a series of detention basins and ultimately discharged or released as required. Stormwater will continue to flow across the site largely unchanged by the development. The proposed detention basins and containment measures form part of an incident response rather than stormwater system. The development does not alter existing catchment drainage behaviour and does not affect run off from existing development.
Acoustic amenity and vibration	
PO20 Construction, operation, maintenance and **decommissioning** meets the **acoustic quality objectives** for **sensitive receptors** on or adjacent to the site identified in the Environmental Protection (Noise) Policy 2019.	**Complies with PO20 and PO21 (refer to section 7.1.6.1 of the report for detailed discussion)** Refer to Matrix Acoustics Noise and Vibration Assessment within Attachment 10.
PO21 Construction, operation, maintenance and **decommissioning** does not cause vibration impacts that adversely affect the operational performance or **sensitive receptors** within or adjacent to the site.	The report confirms that: • The background noise monitoring confirmed significant insect noise at both logger locations, which is a feature of the area. • A 3D noise model was constructed of the area and used to predict noise levels for construction and operation of the development. The model used 'worst case' assumptions including construction hours (i.e. 7am – 6pm) and operational noise modelling (i.e. 100% of BESS units running and inverters at 80% capacity) against the most stringent criterion for daytime hours.

Performance outcomes	Response
	• Noise modelling indicates that with the installation of the earth berm, the proposed development will comply with the noise criteria for Rural environments contained in the *Environmental Protection (Noise) Policy 2019*. • Ongoing noise monitoring will be required during construction and operation of the project. • No vibration equipment is anticipated to be used for the project in construction or operation. Accordingly, the project complies with the Performance Outcomes PO20 and PO21 of the State Code 27 by meeting the requirements of *Environmental Protection (Noise) Policy 2019.*
Visual impact	
PO22 Development is sited and designed to: • minimise visual impacts on **sensitive receptors**; • protect the **landscape values** and **scenic amenity** of the surrounding landscape; and • provide screening and buffering to **sensitive receptors** the greatest extent feasible.	**Complies with PO22 – (refer to section 7.1.6.1 of the report for detailed discussion)** Charlton + Hayman Architects have undertaken a detailed Visual Assessment of the project, and a copy of the report is provided in Attachment 19. The visual catchment of the area includes 15 sensitive receptors as identified in the noise report, public viewing points along Red Hill Road and potential outlooks from walking tracks and camping areas within Eurimbula National Park to the East of the development site. The existing intervening topography and vegetation will largely screen views of the subject site from key aspects/view corridors and adjoining receptors. There are 15 sensitive receptors within 3.5km of the project, with the closest (2.4km) being the host receptor (which will be demolished). There are two other receptors (R2 and R8) which may result in view towards the development due to their elevation relative to the development. It is noted that R8 is located on the property to the north ('Eurimbula') for which a large scale solar and battery development is proposed and is currently unoccupied, as it is intended to be office/control building for that development. Notwithstanding, existing vegetation on the eastern side of the Battery and parts of the berm are likely to partially obscure the view from this receptor. Similarly, R2 which is the closes receptor at 2.3km west of the development ('Greenslopes') which provides workers accommodation for the cattle property. There is heavily vegetated pockets along Killarney Creek and pockets of vegetation along western part of the Battery facilities which is

Performance outcomes	Response
	likely to substantially, if not fully screen the view of the Battery, considering that this property is not visible from the development site. Due to the distance of the project from key public areas (i.e. 500m from Red Hill Road), the development being located adjacent existing High Voltage transmission lines, and the relatively low height of the battery components (being 3.5m maximum), and established vegetation, the project is not anticipated to significantly alter the landscape or visual amenity within the region. It is proposed to construct a 2.7m high berm around the perimeter of the battery development, which will largely obscure the development from view from Red Hill Road,
Lighting	
PO23 Lighting associated with the development provides safe and effective illumination for site operations and maintenance, whilst minimising environmental impacts and visual impacts on **sensitive receptors**.	**Can comply with PO23 (refer to section 7.1.6.1 of the report for detailed discussion)** All external lighting will be low intensity lighting (except where for safety and emergency purposes) and will shine downwards in accordance with AS/NZS 4282:2023.
Transport networks	
PO24 Construction, operation, maintenance and **decommissioning** activities associated with the development do not adversely impact the efficiency and condition of **transport networks** and infrastructure.	**Complies with PO24-PO28 (refer to section 7.1.6.1 of the report for detailed discussion)** PTT undertook a detailed Traffic Impact Assessment and Conceptual OSOM of the project in accordance with PO24-PO28 of the Code. The purpose of the assessment was to evaluate the required access arrangements, traffic generation and impact on the surrounding road network. A copy of their reports is provided for reference in Attachment 7. The reports, read together confirm that the development can be constructed, operated and maintained including decommissioned without adversely impacting transport networks. • The construction phase will be over a 9-12 month period. • Vehicular access to the site will be facilitated from Red Hill Road. • Heavy vehicles will travel to the site from the Port of Gladstone, via the Bruce Highway. • Predicted traffic generation during the construction phase is around 50vpd and 20vph during peak periods.
PO25 Construction, operation, maintenance and **decommissioning** activities associated with the development do not compromise the safety of users of the **transport network**.	
PO26 Development delivers necessary upgrades to the **transport network** to ensure construction activities and ongoing maintenance do not adversely impact **transport networks** and infrastructure.	
PO27 Development demonstrates that a safe, viable and practical haulage route can be secured to accommodate the movement of **oversize/overmass** vehicles during construction and ongoing maintenance activities.	
PO28 Development provides safe, efficient, and sustainable	

Performance outcomes	Response
vehicular access to the site for all vehicle types anticipated through construction, operation, maintenance and **decommissioning**.	• Once operational, the traffic generation is significantly less and relatively infrequent. • The traffic generated by the construction and operational phases of the project is not expected to have a significant adverse impact on the surrounding road network operations. • There will be six (6) OSOM vehicle trips associated with the delivery of transformers (for the Substation) and battery modules. It is expected that all OSOM vehicle movements would originate from the Port of Gladstone and therefore, travel to/from the north of the site. • There are several 'pinch points' identified for the OSOM route which require temporary widening, traffic management, culvert upgrades and removal of cattle grids. Further detailed assessments, including a Pavement Impact Assessment and OSOM Strategy will be prepared closer to construction commencement, as part of further permitting processes required. It is also noted that provision for any upgrades will be borne by the proponent in accordance with the commitments made within the Community Benefit Agreement.
Infrastructure	
PO29 Development is located and designed to avoid unacceptable impacts resulting from proximity to current or approved **resource activity** or **pipeline** near or on the site.	**Complies with PO29 (refer to section 7.1.6.1 of the report for detailed discussion)** Searches undertaken from publicly available information (Qld Globe data sets and Resource Authority – Public Reports, contained in Attachment 16), confirms that the land is not subject to any current Exploration or Mining Permits or leases, including Petroleum Pipelines. There is a single Mineral Exploration Permit that was granted in September 2025 (EPM29097) which is 2km from the western edge of the overall project site, and 4km west from that part of the site proposed to be developed. The Exploration Permit was granted to Dart Exploration until 31 August 2030.
PO30 Development is serviced by all relevant infrastructure commensurate with its scale and operational requirements.	**Complies with PO30 (refer to section 7.1.6.1 of the report for detailed discussion)** Given the rural nature of the site, there are no reticulated water or sewer or stormwater services to the site. There is a 22kV line for residential electricity connections and existing satellite telecommunications. The development will utilize water tanks and on site effluent disposal, as well as on site stormwater

Performance outcomes	Response
	management through sheet flows and containment. A constructed access from Red Hill Road will be provided as outlined above.
Decommissioning	
PO31 Relevant components of development, both after completion of construction and at cessation of operations, are **decommissioned** in a timely and efficient manner.	**Complies with PO31** Refer to proposed Decommissioning Security Report included as Attachment 23. It is intended that after a period of 20 years, a decision will be made to replace or repower parts of the BESS to either extend the life of the development or decommission the project. The proponent has an Option to purchase the land from the current landowner. The proponent intends to exercise the Option and become the freehold landowner of the development site before commencement of construction. It is understood that any conditions of approval will require both an End of Construction and End of Operations Decommissioning Plan/s which reflects any Rehabilitation Management Plans and Site Stabilisation Plans. Noting that the part of the site to be developed does not contain any significant ecological features, and is not high-quality agricultural land, the expectation would be to reinstate the land as pasture when the project is decommissioned. If the Battery Storage Facility is decommissioned after 20 years (or some later date), it is intended that the decommissioning process will follow the 'reverse' of the construction process, as detailed in the Decommissioning Plan. Essentially, following decommissioning: • Infrastructure will be removed, • Disturbed land will be rehabilitated; • Grazing activities can recommence across rehabilitated areas; and • Existing rural access arrangements can be retained where beneficial to future agricultural operations. With respect to the End of Operations Management Plan, the proponent is committed to following the waste hierarchy as outlined in the *Waste Reduction and Recycling Act 2011* (i.e. avoiding, reducing,
PO32 Development **decommissioning** ensures that: • materials removed from site are minimised; • materials that are removed from the site are disposed of at approved disposal facilities capable of receiving the materials; and • opportunities to reuse, recycle and/or repurpose the materials are deployed to the greatest extent feasible.	
PO33 Decommissioning at end of operations ensures disturbance footprints are **rehabilitated**, and **waterways** and drainage patterns are reinstated.	
PO34 Decommissioning incorporates design features that enable reuse, recycling, and recovery of battery components and associated infrastructure at end-of-life.	
PO35 Decommissioning plans are secured by bonds or financial guarantees or other mechanism/s to safeguard compliance.	

Performance outcomes	Response
	reusing and recycling), with an aim to support and partner with companies who promote a 'circular economy' approach to major components. Opportunities for recycling BESS componentry are limited at this time. There are many end-of-life barriers facing the utility-scale energy storage industry. These include challenges related to the physical disassembling of componentry and costs (and risks) associated with transportation of disassembled components. Also, recovery of critical chemical components (such as Lithium iron Phosphate) is still in its infancy, as there is currently little or no value in the chemical components on their own. However, recycling of many individual components (such as copper) is an established industry and with the evolving nature of renewables technology and the timeframes (20+ years) before a decision will need be made with respect to decommissioning, it is expected that more advanced recycling processes will exist at cessation of operation of the BESS that will allow for the reuse, recycle and/or repurpose of materials. It is the proponent's intention to pursue these opportunities in accordance with best industry practice at the time. The quantification of security is outlined in the Decommissioning Security Report and essentially, is $7m in 2026 costs. It is proposed to use a sinking fund structure as security for the decommissioning costs and secured through a Decommissioning Trust Deed which will be binding on successors in title and administered through a licensed corporate trustee.