Attexo
APEM Group

Appendix X

State Code 27 Assessment

State Code 27: Battery storage facility development

Table 1: Purpose statement

Purpose statement	Response
The purpose of this code is to ensure that development of a battery storage facility:	
1. avoids and/or appropriately integrates risk mitigation strategies and responsive design measures to address potential fire hazards, and other environmental risks, ensuring long-term safety and resilience for people, surrounding land uses and the environment.	Assessment of risks of the Project such as thermal runaway, as well as risks to the Project from hazards such as bushfire and flooding, have identified that the Project is able to be designed, constructed and operated in a way that does not result in adverse risk or hazard. Design, construction and operational phase risk assessments and management plans will be undertaken and implemented to ensure the long-term safety and resilience of the Project.
2. minimises the loss or fragmentation of high-quality agricultural land;	The Project is located on mapped ALC Class A and B land and is located within the Rural Zone of the Cassowary Coast Regional Council Planning Scheme. However, the Project Site comprises small lots that are more suited to rural residential uses and are not of sufficient size to support an agricultural production enterprise system. Project impact has been assessed as being insignificant to the sugarcane industry based on potential removal of 11.5 ha of suitable land from future production out of approximately 56,000 ha in the Cassowary Coast local government area. Accordingly, the development of the Project on the chosen site will not result in a significant loss or fragmentation of agricultural land within the region.
3. does not result in unacceptable adverse impacts on individuals, communities, the environment, adjacent sensitive land uses and sensitive receptors, landscape values and infrastructure and services.	A range of technical assessments have been undertaken to demonstrate that the Project will not result in adverse impacts, including, but not limited to, assessment of noise, scenic amenity, ecology, transport, hazard and risk, and water. These assessments have identified that the Project has been sited and designed to minimise adverse impacts to the greatest extent possible, particularly through avoidance of sensitive values and integration of appropriate mitigation measures. Construction and operation of the Project will continue to implement appropriate mitigations to limit adverse impacts to people, infrastructure or the environment as a result of the Project.

Purpose statement	Response
4. is decommissioned in a timely and efficient manner that reuses, recycles, and/or repurposes materials to the greatest extent possible and rehabilitates the environment.	A Preliminary Decommissioning Security Report has been prepared to ensure that decommissioning can occur in a timely manner with minimal risks. Recycling of Project components, including batteries, will be prioritised and is outlined in the Preliminary Battery Recycling Strategy and backed by RWE's *Circular Economy Policy*. Project decommissioning will ensure the Project Site is rehabilitated in a safe, efficient and environmentally conscious manner.

Table 2: Material change of use performance outcomes

Performance Outcome	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** An Ecological Assessment Report (EAR) has been prepared for the Project (refer to **Appendix H** of the Planning Report). Ecological surveys for the site were undertaken to inform project layout and siting. Through iterative design processes, areas of suitable habitat for the mahogany glider (Matter of local environmental significance (MLES)) have been avoided. In addition, the mapped habitat corridor for the mahogany glider will also be buffered and retained, with fencing and other built infrastructure designed to minimise conflict with fauna movement throughout the corridor and wetland protection area, ensuring impact mahogany glider movement does not occur. The EAR concludes the proposed development also avoids impacts on Matters of state environmental significance (MSES) as well as impacts to wetlands and watercourses through siting of infrastructure. Limited trimming of vegetation may be required to meet electrical safety standards where overhead transmission lines (OHTL) span waterways. Ecological values of the Project site and ecological connectivity, waterways and wetlands are protected and maintained.
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:	**Complies with PO2** A Risk Assessment Management Report (RMAR) has been prepared by Riskcon Engineering for the Project (refer to **Appendix J** of the Planning Report).

Performance Outcome	Response
• human health and safety; and • the built and natural environment.	The RMAR demonstrates that the development will be designed, sited and constructed to ensure human health, the built and natural environment are protected. Further, hazard identification and quantitative modelling confirm that impact distances for credible scenarios, such as facility fires, do not reach the site boundary or affect adjacent equipment. The likelihood of a hazardous event with off-site consequences is determined to be near negligible due to inherent safety features (e.g. advanced battery management systems). The Project design also incorporates risk management features such as transformer oil bunding and a facility fire water hydrant system designed to AS 2419.1, with an accompanying emergency containment system to ensure potentially contaminated firefighting water is not released to the environment.
PO3 Development mitigates the risks of fire, explosion and thermal runaway from battery storage infrastructure.	**Complies with PO3** A Fire Safety Study (FSS) and Risk Assessment Management Report (RMAR) has been prepared by Riskcon Engineering for the Project (refer to **Appendix I** and **Appendix J** of the Planning Report). The FSS and RMAR demonstrate that the development mitigates the risk of fire, explosion and thermal runaway from the battery storage infrastructure. The design and siting of the BESS facility has been developed to prevent incident propagation between battery units and associated infrastructure as modelling indicates that radiant heat levels from potential transformer fires are insufficient to ignite adjacent units or equipment. The FSS concludes that Project design and fire protection adequately manage credible fire risks at the site.
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.	**Complies with PO4** A FSS and RMAR has been prepared by Riskcon Engineering for the Project (refer to **Appendix I** and **Appendix J** of the Planning Report). The RMAR confirms that safety will be ensured through Project design and comprehensive management protocols. The BESS units will utilise stable Lithium Iron Phosphate (LFP) chemistry and will be equipped with alarmed fire detection, liquid cooling, and pressure relief systems. While the design is sufficient to manage fires without additional suppression, RWE commits to preparing a site-specific, final Safety and Emergency Management Plan (SEMP). All site personnel will undergo formal induction and training in these emergency response protocols. A minimum of 432,000 L of dedicated facility fire water storage and an associated hydrant system designed to AS 2419.1 will be provided in the BESS area.

Performance Outcome	Response
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** A FSS and a Draft SEMP has been prepared by Riskcon Engineering for the Project (refer to **Appendix I** and **Appendix K** of the Planning Report). The FSS recommends a dedicated, static firefighting water supply to ensure adequate resources are available for incident management. The BESS site will provide at least 432,000 L of water stored in dedicated, on-site tanks. This volume provides sufficient firewater for 3 hydrants operating at 10 L/s each for 4 hours in accordance with AS 2419.1-2021: Fire hydrant installations. The Bushfire Hazard Assessment and Management Plan (BHAMP) prepared by Meridian Urban (refer to **Appendix N** of the Planning Report) also identifies the need for a 40,000 L static, on-site water tank for bushfire protection only, which will be provided in addition to the water supply identified for facility fire and incident management. The water supply infrastructure includes internal hydrants and booster connections which will be accessible to Rural Fire Service Queensland (RFSQ) and Queensland Fire Department (QFD) vehicles. The FSS, Bushfire Management Plan and SEMP will be finalised prior to construction and will be implemented throughout the life of the Project.
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** The proposed Project layout and design accommodate fire hydrant coverage to the BESS facility and emergency vehicle assess throughout the entire development footprint, including two site access points, perimeter access roads and internal tracks that allow for safe emergency vehicle manoeuvring. The Draft Safety and Emergency Management Plan (Draft SEMP) (refer to **Appendix K** of the Planning Report) confirms that all access points and hardstand areas will be maintained to support the weight and turning circles. Fire detection, monitoring, and electrical safety systems implemented during construction and operation will be based on the Original Equipment Manufacturer (OEM) specifications and will be documented in the finalised FSS and SEMP prior to construction.
PO7 Development demonstrates that there is capacity to provide a reliable, sustainable and fit-for-purpose water supply.	**Complies with PO7** A dedicated static water supply for emergency firefighting, including bushfire, will be established at the BESS facility. As required by the Fire Safety Study (FSS) and Bushfire Hazard Assessment and Management Plan (refer to **Appendix J** and **Appendix N** of the Planning Report) the total volume

Performance Outcome	Response
	of water supplied is anticipated to include at least 432,000 L for facility firefighting purposes and 40,000 L for bushfire fighting purposes. It is understood that the exact volumetric requirements for this supply are dependent on the final BESS layout and the selected fire suppression strategy, which will be addressed in the final FSS and BMP prior to construction.
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.** A Social Impact Assessment Report (SIA) has been developed for the Project (refer to **Appendix F** of the Planning Report). A Community Benefit Agreement (CBA) was executed between RWE and Cassowary Coast Regional Council on 19th May 2026 (refer to **Appendix G** of the Planning Report). This agreement formalises the Project's commitment to delivering tangible long-term benefits to the local community in Tully.
Agricultural land	
PO9 Development is located and designed to ensure there is no unacceptable loss of **high-quality agricultural land**.	**Complies with PO9** The Project will not result in a significant loss to high-quality agricultural land (HQAL) values. An Agricultural Land Assessment (ALA) (refer to **Appendix L** of the Planning Report) has been prepared and describes that while there is mapped agricultural land classification (ALC) Class A and B within the site, it is not a sufficient size to support an agricultural production enterprise system. At a biophysical level, the Project Site's most likely and valuable agricultural use is considered to consist of: • 11.5 ha of potential sugarcane land • 9.5 ha of potential grazing land • 6 ha of wetland that is not suitable for agricultural use • 1 ha of residential and farm infrastructure.

Performance Outcome	Response
	Impact to agricultural production is estimated to be valued at $71,155 in gross annual productivity based on data from the 2024 Tully sugar district productivity plan (sugarcane production data and cane gross value) and an extrapolation from the indicative regional annual commodity values for livestock grazing. Development of the Project represents an insignificant loss 0.02% of potential sugarcane land from future production in the LGA (approximately 56,000 ha), which is considered insignificant to the broader regional agricultural economy. Therefore, there is no unacceptable loss of HQAL as a result of the Project.
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.	**Complies with PO10** The ALA (refer to **Appendix L** of the Planning Report) confirms that the Project Site comprises small sized lots that are physically constrained and fragmented from larger farming units. The site includes approximately 6 ha of wetland which is unsuitable for agriculture, this represents 19.1% of the total site area, which would be excluded from any agricultural or other land use. The Project ensures the long-term preservation of the land as the proposed development is reversible, and the site can be rehabilitated to rural use at the end of the project life, ensuring no permanent alienation or fragmentation of the underlying soil resource.
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.	**Complies with PO11** The Project ensures the long-term preservation of the land. The BESS facility will be 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.	**Complies with PO12** The proposed Project is not located within or adjacent to a stock route network.
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** A Natural Hazards and Extreme Weather Risk Assessment (NHEWRA) (refer to **Appendix M** of the Planning Report) has been prepared for the Project. The NHEWRA identifies exposure to extreme heat and heatwave, severe storms, cyclones and bushfire as the most significant risks relevant to the design, construction, and operation of the Project. The Project site is not exposed to landslide

Performance Outcome	Response
	or coastal hazards, nor is an earthquake likely to occur within the next 50 years which is beyond the design horizon of the Project. Flood risk is avoided through siting infrastructure associated with the Project completely outside of Flood Hazard Area (outside of the 1% Annual Exceedance (AEP) flood event), and additionally with a design floor level equal to the 0.2% AEP adopted for the site. A Preliminary Erosion and Sediment Control Plan (P-ESCP) has been developed for the Project (refer to **Appendix P** of the Planning Report) to demonstrate that potential erosion and sedimentation impacts associated with Project establishment are able to be effectively managed. The PS-ESCP establishes a baseline standard for soil erosion and sediment controls that will be applicable to Project construction works and will inform a detailed construction-phase ESCP. The Project will be designed, constructed and operated in a manner that responds to the potential impacts of extreme weather events.
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** The Project Site is not exposed to landslide or coastal hazards, nor is an earthquake likely to occur within the next 50 years. The NHEWRA (refer to **Appendix M** of the Planning Report) identifies severe storms as an almost certain hazard within the locality throughout the life of the Project. The site also faces potential exposure to cyclones, strong winds, and extreme heat and heatwaves. The NHEWRA concludes that appropriate design and mitigation measures will reduce these risks to a tolerable level, which will be outlined in the Project's Safety and Emergency Management Plan (SEMP) to be developed prior to construction. The majority of the BESS development footprint is located outside of mapped bushfire prone areas. A small portion of the western facility sits within the SPP mapped 'Potential impact buffer'. However, the Bushfire Hazard Assessment and Management Plan (BHAMP) (refer to **Appendix N** of the Planning Report) concludes that current SPP mapping does not accurately reflect the actual bushfire hazard risk due to actual, limited vegetation cover. Similarly, the SPP mapped 'High potential bushfire intensity' area where the grid connection passes contain little to no vegetation. As such, it is considered that the Project avoids genuine bushfire prone areas. The Flood Assessment and Stormwater Management Plan prepared by Water Technology (refer to **Appendix O** of the Planning Report) found that any flood inundation can be mitigated through

Performance Outcome	Response
	site development works such as fill, grading and re-leveling and stormwater infrastructure. The adopted design floor level equal to the 0.2% AEP will effectively mitigate risk of flood inundation.
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** As outlined in the BHAMP and NHEWRA (refer to **Appendix N** and **Appendix M** of the Planning Report), the BESS is to be protected by a cleared, on-site Asset Protection Zone (APZ) engineered to a 10kW/m^2 radiant heat threshold and supported by ongoing vegetation management. To further reduce risk and ensure safe evacuation, the site will incorporate two direct access points to Sandy Creek Road, a dedicated 40,000 L static bushfire fighting water supply, and comprehensive emergency protocols that define the safe assembly areas and specific bushfire response procedures.
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** A Preliminary Erosion and Sediment Control Plan (P-ESCP) has been developed for the Project (refer to **Appendix P** of the Planning Report). The P-ESCP concludes that the Project ranges between high and extreme erosion risk dependent on the predicted rainfall amounts and identifies the baseline requirements to be included within the Project's construction erosion and sediment control plans. These plans will be developed prior to the commencement of works and implemented throughout the construction period of the Project. Upon completion of construction, the BESS development footprint will be completely stabilised by compacted hardstand, aggregate groundcover and landscaping with a stormwater drainage system to manage runoff as described in the SMP (refer to **Appendix O** of the Planning Report).
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	**Complies with PO17** The Project has avoided and minimised crossings of, and interference with, natural drainage lines, waterways and wetlands to the greatest extent possible. Limited trimming of regulated vegetation associated with waterways may be required to meet electrical safety standards where the OHTL spans the watercourse and wetlands. The Stormwater Management Plan (SMP) (refer to **Appendix O** of the Planning Report) demonstrates there will be an overall net improvement in the runoff water quality discharging

Performance Outcome	Response
• preserving the bank stability of affected **waterways** and drainage lines avoiding non-essential hardening or unnatural modification of the **waterway**.	from the site. This will be achieved through the implementation of appropriate stormwater quality management measures. The Project will be constructed to maintain or improve the water quality of receiving waters, waterways and wetlands through development and implementation of a final ESCP prior to construction.
PO18 Development prevents the release of contaminants to surface water or groundwater in the event of an incident, including a fire or explosion.	**Complies with PO18** To prevent the release of contaminants to surface water or groundwater during an incident such as fire or explosion, the BESS is sited on a compacted hardstand area and includes an emergency containment storage. As detailed in the SMP (refer to **Appendix O** of the Planning Report), the emergency containment storage has been sized to capture the full volume of water provided on-site for facility firefighting purposes (432,000 L). The emergency containment system will be located offline and upstream of the bioretention basin, to ensure potentially contaminated firefighting water is not released to the environment. The emergency containment system will be refined through detailed design of the Project.
PO19 Development minimises interference with overland flow paths.	**Complies with PO19** A Flood Assessment has been prepared by Water Technology (refer to **Appendix O** of the Planning Report) to characterise existing overland flow flood behaviour within and surrounding the Project site. The assessment concluded that overland flow from the north is conveyed via culverts beneath Tully Gorge Road before diverging east and west, ultimately draining to the Tully River without posing a flood risk to the Project site. The Project site experiences only shallow overland flow and some localised ponding along the southern site boundary, and mapped inundation identifies runoff travelling towards downstream waterways. The Project does not interfere with conveyance flowpaths for external flows through the Project site and can be developed to accommodate existing flow paths with minimal interference.
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** A Noise and Vibration Impact Assessment (NVIA) (refer to **Appendix Q** of the Planning Report) has been prepared for the Project by Marshall Day Acoustics. The operational noise levels

Performance Outcome	Response
	associated with all Project infrastructure have been assessed in accordance with the Queensland Environmental Protection (Noise) Policy 2019 (EPP Noise). The assessment considered operational noise associated with the nominated Tesla battery/inverter unit, MV transformer and HV transformer specifications. Noise levels associated with this infrastructure have been assessed in accordance with the EPP Noise. This assessment concludes that the Project is able to be operated to achieve compliance with criteria stated in the Planning Scheme and EPP Noise. Temporary construction noise in Queensland is not measured against the acoustic quality objectives under the EPP Noise. Accordingly, the Department of Transport and Main Roads' *Transport Noise Management Code of Practice: Volume 2 – Construction Noise and Vibration*, dated May 2023 (Code of Practice Vol. 2) has instead been used to identify relevant criteria for construction noise. The maximum predicted construction noise level for Project construction (56 dB) is within the acceptable range for airborne construction noise criteria within in the Code of Practice Vol. 2, which identifies a minimum upper limit of 65 dB. Construction noise can additionally be appropriately managed and mitigated through: • implementation of a Construction Noise and Vibration Management Plan (CNVMP) to be developed prior to Project construction • Implementation of standard work hours of 6:30am to 6:30pm Monday-Saturday, and no generation of noise on Sundays or public holidays.
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.	**Complies with PO21** Construction of the Project is anticipated to take 18 months to complete, vibration activities during the construction phase (i.e., use of piling hammers) will be sporadic and temporary rather than continuous and are not anticipated to cause any adverse vibration due to the proximity to the nearest sensitive receptor (dwelling), being approximately 480 m. No adverse vibration impacts are anticipated during the Project's operation and maintenance phases. The Project will be supported by a CNVMP that will be finalised prior to Project construction. The CNVMP will establish construction vibration protocols and mitigation measures under an avoid, minimise and management hierarchy.
Visual impact	
PO22 Development is sited and designed to:	**Complies with PO22**

Performance Outcome	Response
• 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.	Iris Visual + Design has prepared a Scenic Amenity Impact Assessment (SAIA) Report (refer to **Appendix R** of the Planning Report). The SAIA Report identified several areas in proximity to the site with potential views of the proposed development. However, the assessment concludes that there will be negligible residual impacts from Project infrastructure within the surrounding area due to existing vegetation screening along Tully Gorge Road and northeast of the site and the low-lying, rural landform. To minimise any visual impact on sensitive receptors, a Landscape Plan has been prepared by Cusp Landscape Architecture + Urban Design (refer to **Appendix S** of the Planning Report). A combination of screening vegetation at the lot boundary, including scattered tree planting will be implemented.
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**.	**Complies with PO23** All lighting used during construction and operation will be designed and operated in accordance with *AS/NZS 4282:2023 Control of the obtrusive effects of outdoor lighting*.
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** The Project's construction, operation, maintenance and decommissioning activities will maintain transport network efficiency and user safety, as detailed in the Traffic Impact Assessment (TIA) (**Appendix T** of the Planning Report) prepared by Cambray Consulting. The net increase in traffic demands as a result of the Project is negligible in the context of the broader road network.
PO25 Construction, operation, maintenance and **decommissioning** activities associated with the development do not compromise the safety of users of the **transport network**.	**Complies with PO25** The TIA (**Appendix T** of the Planning Report) concludes no safety related mitigation works are required to facilitate traffic movements to and from the Project site. The traffic capacity analysis implies that the state-controlled road network and local road network can accommodate the trips generated from the Project. Additionally, the TIA indicates that there is appropriate sight distance along Sandy Creek Road for all access points.

Performance Outcome	Response
PO26 Development delivers necessary upgrades to the **transport network** to ensure construction activities and ongoing maintenance do not adversely impact **transport networks** and infrastructure.	**Complies with PO26** The Project incorporates necessary upgrades to the two site access points from Sandy Creek Road to appropriately accommodate construction activities, as described in the TIA (**Appendix T** of the Planning Report). Ratio Consultants have prepared a Heavy Vehicle and Oversize Overmass (OSOM) Construction Concept Strategy (OSOM Strategy) to identify a safe and feasible route for the delivery of Project components to the site (**Appendix U** of the Planning Report). The OSOM Strategy includes swept path assessment for the rail crossing of Dean Road in proximity to the Bruce Highway. Assessment of the largest proposed vehicle configuration found that the movement through the intersection and railway crossing should not require modification or upgrades for the OSOM movements.
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.	**Complies with PO27** The OSOM Strategy (**Appendix U** of the Planning Report) has considered in detail the proposed route from the Port of Townsville to the Project site to be suitable for the delivery of OSOM components. While there are potential height restrictions due to the transported height of the 132/33 kV high-voltage transformer (5.2 m on a low loader), an alternative counterflow on North Townsville Road has been identified. RWE has requested a meeting with the Port of Townsville to explore the potential use of the Port to support delivery and logistics of key project components, including approximately 188 BESS units and high-voltage transformers. RWE's forward engagement program includes seeking input on project logistics from the Department of Transport and Main Roads, CCRC, the National Heavy Vehicle Regulator and private sugar cane rail line operators.
PO28 Development provides safe, efficient, and sustainable vehicular access to the site for all vehicle types anticipated through construction, operation, maintenance and **decommissioning**.	**Complies with PO28** The Project's construction and operation activities will maintain transport network efficiency and user safety, as detailed in the Traffic Impact Assessment (TIA) Report (**Appendix T** of the Planning Report). Permanent site access to the Project site will be via two points along Sandy Creek Road. The proposed access points are considered to be safe, efficient and sustainable with minor vegetation management required to maintain appropriate sight distances.
Infrastructure	

Performance Outcome	Response
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.	**Not applicable.** The Project is not located in an area in proximity to a current or approved resource activity or pipeline. There are no anticipated impacts to these types of infrastructure.
PO30 Development is serviced by all relevant infrastructure commensurate with its scale and operational requirements.	**Complies with PO30** Reticulated water supply and domestic electrical infrastructure are available at the Project Site and will be used where appropriate by the Project. This may comprise connection via the existing dwellings, if they are retained and used for O&M facilities, or to a newly constructed O&M building. Water supply for the Project will further include: • rainwater harvesting to be used for potable supplies where possible • freshwater potentially trucked in during drought periods • on-site firewater supplies for both facility fire and bushfire fighting purposes • bulk water supply from a CCRC supply point located approximately 6 km north of the Project Site.
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** Decommissioning will be managed appropriately through the following overarching Project management plans: • Prior to the finalisation of construction of the Project, an End of Construction Decommissioning Management Plan (ECDMP) will be prepared • Prior to the cessation of operations of the Project, an End of Operations Decommissioning Management Plan (EODMP) will be prepared. Preliminary end of operations decommissioning strategies have been discussed in the Preliminary Decommissioning Security Report (**Appendix V** of the Planning Report).
PO32 Development **decommissioning** ensures that:	**Complies with PO32**

Performance Outcome	Response
• 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.	Materials to be removed from the BESS development footprint and grid connection during the end of construction and end of operations decommissioning stages will seek to follow higher order preferences than disposal as per the waste and resource management hierarchy to minimise landfill waste. The Decommissioning Security Report and the Preliminary Battery Recycling Strategy (refer to **Appendix V** and **Appendix W** of the Planning Report) has considered: • High-level actions in accordance with the waste and resource management hierarchy and circular economy principles • Key potential waste streams associated with end of construction and end of operations decommissioning. RWE will continue to investigate end-of-life options for the Project (i.e., BESS components) which will inform waste and resource recovery options to support the ECDMP, EODCMP and final Battery Recycling Strategy. These investigations will be carried out in consultation with CCRC and relevant stakeholders and will continue as the Project progresses.
PO33 Decommissioning at end of operations ensures disturbance footprints are **rehabilitated**, and **waterways** and drainage patterns are reinstated.	**Complies with PO33** The Project infrastructure and disturbance will be decommissioned and rehabilitated in a timely and efficient manner as summarised in the Preliminary Decommissioning Security Report (refer to **Appendix V** of the Planning Report). Rehabilitation objectives and methods will reinstate disturbed land to allow for the return of the current land use (i.e., agriculture). Prior to decommissioning of the Project, an EODMP will be prepared to outline how the Project will be decommissioned. Decommissioning at the end of operations will be carried out in accordance with Project Rehabilitation Management Plan and Site Stabilisation Plan – Operations as part of the EODMP.
PO34 Decommissioning incorporates design features that enable reuse, recycling, and recovery of battery components and associated infrastructure at end-of-life.	**Complies with PO34** Materials removed from the Project development footprint during the end of operations decommissioning stage will be managed in accordance with the waste and resource management hierarchy. This approach prioritises reuse and recycling over waste disposal to landfill as outlined in the *Waste Reduction and Recycling Act 2011* and backed by RWE's *Circular Economy Policy*. This commitment has been detailed in the Preliminary Battery Recycling Strategy (PBRS) (refer to **Appendix W** of the Planning Report).

Performance Outcome	Response
	The PBRS acknowledges that there will be significant advances in recycling technology and capacity in Australia prior to end of operations decommissioning. RWE commits to the delivery of a final Battery Recycling Strategy as part of the EODMP.
PO35 Decommissioning plans are secured by bonds or financial guarantees or other mechanism/s to safeguard compliance.	**Complies with PO35** RWE is committed to ensure that Project decommissioning will occur with full financial accountability and minimal risk to the State and/or CCRC. The Project design ensures that the construction phase creates no specific infrastructure that requires a separate removal process, as such there are no requirements for decommissioning activities at the completion of construction. Any minor site works are considered part of the standard construction budget and therefore financial security is not necessary for end of construction decommissioning. RWE will decommission the Project at its end of life in accordance with the Preliminary Decommissioning Security Report (DSR) (refer to **Appendix V** of the Planning Report) and Project approval conditions. The DSR provides the framework for the closure process and preliminary cost estimates. The DSR sets out the Decommissioning Security Arrangement which is via a land ownership-based security mechanism. RWE Renewables Australia Pty Ltd currently holds an option to acquire the Project land. Prior to construction, the Proponent has the right to and will exercise the option and become the registered owner of the land on which the Project is located.