

(BESS)Our Ref: 5959.08

13 December 2021

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**RANGEBANK BESS
Response to Section 54 Request
280 Evans Road CRANBOURNE WEST
DELWP Ref: PA2101362**

We continue to act on behalf of Macquarie Corporate Holdings Pty Limited in regard to the above Planning Permit Application for the Rangebank BESS, a significant energy resource initiative, in Cranbourne West and provide the following response to DELWP's letter dated 27 October 2021 requesting further information pursuant to Section 54 of the *Planning and Environment Act 1987*.

We provide the following revised and additional documentation for consideration in response to the matters raised:

1. Planning Permit Application Form (revised);
2. Planning Report, Version 3, prepared by KLM Spatial dated December 2021;
3. Rangebank BESS Site Plan, Plan, Elevations 5959.08 PE01_V4, Sheets 1-4, KLM Spatial, 25/11/21;
4. Landscape Concept Design Package Rangebank BESS, Pollen Studio, Issue 9, 10/12/21;
5. Substation Elevation 220/33kV Substation, Drawing No. CRB-DRW-FLN-51-005 prepared by Fluence 17/11/21;
6. Heavy Duty Vehicle Crossing Standard Drawings for Subdivisions in Growth Areas, EDCM, December 2015;

These documents are now reference in the updated planning report, with Attachment numbers for the report noted in file names.

The key changes to the plans from that previously submitted are as follows:

- The vehicle entry to the site is located further south on Battery Court, so as to better respond to the topography, and associated details are included in relation to the grade of access ways into the site and treatment of landscaping areas adjacent to Battery Court.
- Indicative detail is provided for the main substation/transformer yard including fencing.

We provide the following response to the specific items raised in the DELWP request.

1. The application form unintentionally included the cost of the BESS Cable which has been applied for separately under Planning Permit PA2101364. We have updated the application form to reflect the correct amount which aligns with the MPL Certificate at \$80,200,000.
2. The Planning Report submitted with the application has been revised to address the following:
 - We confirm that the bulk earthworks associated with Planning Permit PA20-0983 are currently underway on site and completion is anticipated by the end of February 2022. We do not object to the inclusion of a condition requiring the earthworks to be completed prior to the commencement of works associated with this current permit application, as this will clearly occur.
 - Further commentary was requested in relation to the proposal as being generally in accordance with the Cranbourne West PSP. This has been provided in detail in Section 6.2.2 of the revised report (p.35-36), and is summarised as follows:

The benefits of security of electricity supply and increased energy efficiency for the region and the wider metropolitan area, proposed by the Rangebank BESS, finds justification in the Vision for the PSP,

The vision therefore is to produce an integrated living and working environment that fosters a diverse and dynamic blend of lifestyle and commerce opportunities, unprecedented in an outer suburban location.....Cranbourne West will become known as a leading example of best practice in sustainable urban development. This will set it apart from other developments and lift the identity of Cranbourne, attracting residents, businesses and visitors who place a premium on ecologically, socially and economically responsible lifestyles.

The strength of the proposal in meeting the Vision and the Utility and Energy objectives, which promote *resource management* and *sustainable technology*, through the provision of a leading edge energy storage facility not located elsewhere in the metropolitan area, is considered to outweigh the Business Park guidelines which propose that office and warehouse uses should (but not must) be directed to this area. These traditional land uses can be accommodated on many other undeveloped sites across Cranbourne West, whilst the proposed substantial investment in the Rangebank BESS and resultant wide-ranging benefits rely upon the chosen location adjoining the Ausnet terminal. Whilst the BESS will generate substantial skilled employment in the construction phase (an average of 50-80 staff on site at any time) and six (6) ongoing skilled roles on and off site, its presence will negligibly impact overall employment numbers in the expansive Cranbourne West precinct.

The facility responds to key design guidelines set down in the PSP including streetscape presentation, and appropriately considers the amenity of the adjoining residential area in Breens Road, as demonstrated by the comprehensive *Acoustic Report* and *Preliminary Hazard Assessment*, and specifically by the provision of mitigation measures including an acoustic fence, and landscaping of this sensitive interface.

For these reasons, and as otherwise outlined in further detail in the report, the Rangebank BESS proposal is considered to be generally in accordance with the Cranbourne West PSP.

- The revised Landscape Plan incorporates the levels from the endorsed Earthworks Plan and is amended to indicate:
 - i. Relocation of the entry further south on Battery Court to a location where the adjacent grade along the western boundary is lesser,
 - ii. Suitable planting on the embankment adjacent to Battery Court,
 - iii. Internal grades of the access roads (1 in 20) to provide for appropriate large vehicle access, and
 - iv. Revised elevations and sections from Battery Court and Breens Road incorporating existing surface level and the approved ground levels from the endorsed Bulk Earthworks Plan.

The western section of the acoustic wall will be located above current natural surface level, whilst the eastern section of the wall will be located either at or below current surface levels, based on the approved earthworks levels. The top of 4.5 metre wall will sit between 4-5 metres above existing ground levels (prior to approved earthworks now underway).

3. The plans associated with the application are amended as follows:
 - i. An indicative elevation of the 220/33kV substation/transformer yard is provided. The transformer has a height of approximately 7.7m, whilst the two lightning masts have a height of approximately 21 metres, and the light poles have a height of approximately 11 metres. We note that the fence around the yard is 3 metres in height and will be topped with security wire to prevent unauthorised access.
 - ii. The lightning mast height included in the indicative substation elevation represent the worst-case scenario and will be reduced in height to the minimum required during detailed design
 - iii. Setbacks of the proposed infrastructure from the powerline easement and boundaries have been added to the Site Plan.
 - iv. The revised plan notes there will be no fencing on the southern boundary. The acoustic wall at a height of 4.5 metres is setback approximately 3.26 metres from that boundary.
 - v. The vehicle crossover to Battery Court is located further south to better address site levels and is shown as having a minimum width of 6 metres. With an indicative alignment, avoiding a proposed light pole. No other proposed pits or similar are located in the vicinity of the crossover. We have provided the standard drawing *Heavy Duty Vehicle Crossing Standard Drawings for Subdivisions in Growth Areas, EDCM*, and the crossover will be designed and constructed in accordance with this standard at the appropriate time. A Vehicle Crossing Permit will be sought from the City of Casey prior to construction.
4. The revised Landscape Plan incorporates the levels from the endorsed Bulk Earthworks Plan. The elevations from Battery Court and Breens Road show existing ground level and the approved earthworks level.

An embankment will lie along the western boundary adjacent to Battery Court. The development area and infrastructure will therefore sit above the level of the proposed road. The core transformers at the west end of each row of battery cubes are typically limited in height to 3.6 metres, and will be setback some 17 metres from the road (other than in the vicinity of the entrance). Accordingly, it is not considered that the development will present as having excessive bulk or imposing on views from the road. The development is likely to be recessive in appearance, and will be largely screened once the embankment planting is established.

The elevation of the acoustic wall as viewed from Breens Road, will in the western and central section be approximately 0.25-0.5 metres above existing surface level. The eastern section of the wall facing Breens Road will be at natural surface or up to 0.5 metres below natural surface. The 4.5 metre tall acoustic wall height could therefore be considered as appearing between 4 metres to 5 metres above the existing current natural ground level, according with the approved earthworks levels.

The distance between the acoustic wall and neighbouring residential properties of more than 23 metres, is considered an appropriate separation, and will not result in overshadowing of these properties. The wall may be visible above rear/side fences, however at a maximum height of 5 metres above existing natural surface, the wall, will in comparison, have a lesser height than a typical modern warehouse or industrial building, which could be reasonable expected to be constructed on the land. (We note a height of 5 metres is less than that of a typical double storey dwelling).

5. During recent discussions with yourself, it was indicated that all construction vehicles associated with the project will make use of Battery Court, Rangebank Drive and the signalised intersection at Thompsons Road to access the site. Rangebank Drive and Battery Court are anticipated to be completed in April 2022, and the intersection is already operational. These roads are to be built to industrial standards and will be capable of carrying vehicles up to and including B-doubles. Given the substantial capacity of the proposed roads and sizeable intersection your advice was that that a Traffic Impact Assessment for construction traffic was not warranted. Traffic management and haulage routes will be addressed as part of an Environment Management Plan which is expected to be a condition of any permit that issues

We provide the following information concerning the likely volumes of construction traffic associated with the development, and are confident the proposed roads will cater for the proposed vehicles.

Traffic types and volumes

Work Stage	Average light vehicle trips per day	Average heavy vehicle trips per day
Stage 1	40	10
Stage 2	60	15
Stage 3	60	15
Operations	2	0

Temporary car parking will be provided on site for construction vehicles which will be easily accommodated given the absence of development elsewhere on the land. After construction has been completed, it is anticipated that there will be routine management and maintenance which will generate a low number of vehicles.

In addition to the above, DELWP raised preliminary concerns with the proposal. We provide the following response to those concerns and outline where we have amended the proposal:

- We confirm the most recently endorsed Bulk Earthworks Plan approved on 20/8/21 is relied upon by this application. We understand that DELWP has a copy of this plan.
- As previously outlined, the crossover location has been relocated further south as the fall of the land is only 1.3 metres rather than 2 metres adjacent to the road. The accessways will be graded to 1 in 20 into the site, to ensure ease of access for large vehicles. The 23 metre width of Battery Court will allow adequate space for a left turn into the site off the road.

The width of the crossover is a minimum of 6 metres and the plans have been updated to reflect this change. Full details of the crossing will be provided at the detailed design stage however, we provide the standard drawing for a Heavy Duty Vehicle Crossing for reference.

- The application does not include signage and the sign previously shown near the entrance has been removed from the plan.
- The landscape plan has been updated include root barriers adjacent to the acoustic wall to avoid root damage as trees establish.
- The Rangebank BESS will generate ongoing highly skilled employment opportunities both on-site and off-site as below:
 - 2 full time staff in Operation and Management roles (24 hour control room with regular visits to site),
 - 2 full time roles in the trading room (managing and monitoring electricity trading contracts), and
 - 2 full time staff in project support roles within Fluence (equipment supply company).

The project will be a catalyst for the creation of a new Fluence spares warehouse in the general vicinity (location to be determined) which will result in the employment of additional local support staff.

During the construction stage the Rangebank BESS will employ an average number of 50-80 workers, but this may at times increase to a peak workforce of up to 150 workers on site.

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Construction Stage	Details	Duration	Average number for employees on site
Stage 1	Site establishment, drainage, construction of foundations, hardstands and associated civil works	3 months	50
Stage 2	Delivery and installation of BESS electrical infrastructure	4 months	80
Stage 3	Commissioning and testing	2 months	80
Ongoing Operations	Ongoing operations and maintenance		2

The Rangebank BESS will contribute highly skilled employment opportunities in Cranbourne West in accordance with the intent of the Precinct Structure Plan.

Should you have any further queries, or the information provided and/or the above responses is deemed unsatisfactory, we request an extension of time be granted to enable us to provide a further response. An extension of 30 days is sought in that instance.

We trust the above is acceptable and look forward to progressing towards the issue of a planning permit and look forward to hearing from you in due course. If you have any queries regarding the above, please contact the undersigned on [REDACTED] or via email [REDACTED]

Yours Sincerely

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