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Tuesday, 29 October 2024

Project number: M240567 Reference: M240567LT1A

Sherrin Yeo Mint Renewables Level 31, 60 Martin Place, Sydney, New South Wales 2000

Dear Sherrin,

Dederang BESS Peer Review of Acoustic Report This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright

1 Introduction

As requested, we have undertaken a review of the environmental noise assessment prepared for the proposed Dederang Battery Energy Storage System (BESS). This letter sets out the findings of our review.

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2 Background

The proposed Dederang BESS is to be constructed at a site on Dederang Road, west of the intersection with Kiewa Valley Road. The site is located close to the existing Dederang Terminal Station and is also located north of the site of another proposed, but not approved, BESS project being the Kiewa Valley BESS.

The Dederang BESS would have a nominal 400 MWh capacity and include noise sources consisting of BESS modules, inverters and transformers, along with an on-site substation including a step-up transformer.

An environmental noise assessment of the proposed Dederang BESS has been prepared by Sonus and is documented in Sonus report S7646C10 *Dederang BESS Environmental Noise Assessment* dated October 2024 (Sonus Report). We note that the October 2024 version of the Sonus Report has been revised from a previous version (August 2024) upon which we previously provided comments and that comments we provided previously have been satisfactorily addressed.

3 Peer review comments

Our comments on the Sonus Report are provided in Table 1.

Section	Comment	Recommendations
Section 2 – Legislative and Policy Context	The legislative and policy context in the Sonus Report considers relevant aspects of the <i>Alpine Planning Scheme</i> and the <i>Environment</i> <i>Protection Regulations</i> (the Regulations), including associated Environment Protection Authority (EPA) Victoria publications. The report also gives consideration to the <i>Environment Protection Act 2017</i> and general environmental duty.	Nil

Table 1 Peer review comments

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Section Comment **Recommendations** Section 4 Appropriate noise limits have been established in accordance with the Nil. Noise Limits Regulations that are based on the Zoning Levels established as per the Noise Protocol. It is noted that the background noise levels presented in the Sonus Report indicate that, at the time of the measurements, there was significant influence from insect noise that was constant throughout the monitoring. Sonus has correctly noted that this noise may not be present at all times of year and, therefore has used the Zoning Levels to set the noise limits. While it is not appropriate to use the insect noise to justify higher noise limits it also means that the limits are set considerably lower than the background noise levels that do occur with the insect noise occurring. As such, during periods of the year where insect noise is present, the insect noise is likely to be at a noise level significantly higher than that produced by the Dederang BESS. Section 5 The approach taken by Sonus to establish noise criteria considering Nil. Cumulative noise from both the existing Dederang Terminal Station and the future Noise Kiewa Valley BESS is considered appropriate and consistent with EPA Victoria guidance. The approach will require Dederang BESS and Kiewa Valley BESS to 'share' the effective noise limits, which is an appropriate approach given that neither have been granted formal planning approval at this stage. Section 7 The noise prediction methodology is considered appropriate and Nil. Noise consistent with good practice for environmental noise prediction in Predictions Victoria. A 2 to 5 dB tonal adjustment has been applied that is understood to be associated with high frequency noise from the inverters. From discussions with Sonus, it is understood that this tone would be unlikely to be clearly audible at times of insect noise, but may be audible in the absence of insect noise and therefore has been applied to ensure that the site would comply with the noise limits in the absence of insect noise. Section 8 The assessment against the criteria is considered appropriate. Nil. Assessment With respect to the low frequency noise predictions, predictions are only against criteria shown for frequencies of 25 Hz to 160 Hz and it is noted that this is a result of limitations in the data provided by manufacturers. EPA Victoria Publication 1996 allows for some low frequency one-third octave bands to be excluded where the C-weighted noise level is low, which we expect would be the case here. As such, we note that we expect that the exclusion is consistent with EPA Victoria Publication 1996 and do not expect any risk of problematic low frequency noise in this frequency range.

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Section	Comment	Recommendations
Section 9 Mitigation	The Sonus Report presents potential mitigation measures to address the predicted tonal noise that occurs at 3.15 kHz.	Nil.
	We consider that the mitigation presented would be capable of providing the minimum required reduction as set out in the Sonus Report, noting that it is generally easier to attenuate noise at these frequencies. The removal of, or reduction of, tonal noise is also considered consistent with the principles of the general environmental duty.	

4 **Conclusion**

We have undertaken a peer review of the environmental noise assessment prepared by Sonus for the Dederang BESS. We consider that the assessment has been conducted in accordance with relevant legislation, policy and guidelines in Victoria and in accordance with good practice noise modelling procedures.

Please let me know if you have any queries or wish to discuss the above.

Yours sincerely,

Tom Evans Director p +61 3 9020 3888 m +61 421 279 929 tom.evans@resonate-consultants.com

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