16 January 2025

Minister for Planning
Department for Housing and Urban Development
Via email: dhud.crownimpactassessment@sa.gov.au

RE: Request for Support of a Planning Variation to Modify Interconnection Point and Increase Project Capacity for Riverland Solar Farm & Battery Energy Storage System (Development No. 711/V030/17)

Riverland Solar Farm and Battery Energy Storage System (the Project) is a joint venture development between OX2 Holdings Pty Ltd (OX2) and Magnetar Solar Australia DAC (Magnetar Solar). OX2 is writing to request a Planning Variation for the Riverland Solar Farm and Battery Energy Storage System, previously approved under Development No: 711/V030/17. The proposed changes include:

1. Modification of the transmission line connection point, changing from connection via the 2x 132kV North West Bend–Monash lines to the Robertstown–Buronga 330kV Project Energy Connect (PEC) line traversing the Project Site.
2. Shifting the location of the Stage 1 BESS Area to achieve this connection point. This includes moving areas allocated for the Stage 1 BESS, substation, switchyard and other connection infrastructure from property parcel CT 5990/945 Section 65 to CT 5990/945 Section 66 and CT 5990/945 Section 67. It should be noted the revised development footprint remains entirely within the Property Boundary as defined in the original Development Application.
3. To make the project commercially feasible at the new 330kV point of connection, an increase in the Stage 1 BESS capacity to 300MW/1200MWh (4-hour duration).

The requested changes to Riverland Stage 1 BESS arise from revised connection strategy recommendations and updated technical advice from the Network Service Provider, ElectraNet. A detailed explanation of this rationale is presented in Section 4 below.

Please note OX2 has a target financial close date for this project of Q4 2026 and since acquiring this project, have spent significant funds and have allocated budget to complete this project including $1.5 million in grid connection studies.

We acknowledge and accept any associated application fees for this Planning Variation.

The Project is Crown sponsored under Section 49 of the *Development Act 1993* (refer to Appendix C) by the Department of Energy and Mining. On 16 December 2025, the Department of Energy and Mining confirmed support for the Planning Variation to the development approval (Refer to Appendix A).

1. About OX2

OX2 is a Swedish company that develops, builds, owns and operates large-scale renewable energy solutions globally, primarily focusing on wind and solar energy generation and battery energy storage systems. OX2 is currently Europe's largest onshore wind developer.

In May 2023, OX2 acquired ESCO Pacific Holdings Pty Ltd (ESCO Pacific), a leading Australian solar developer, marking its entry into the Australian market. We are active across Australia with our national head office in Melbourne where we have been operating for nearly 2.5 years. We have a pipeline of 11 projects in development across all mainland states, 1 project in construction and seven projects in operation.

Since entering the Australian market, we have successfully achieved financial close on four projects across Australia, the operational Glenrowan Solar Farm and the Lancaster Solar Farm, Mulwala Solar Farm and the State Electricity Commission (SEC) Renewable Energy Park – Horsham which are currently in construction.

The Riverland Project forms part of our acquired development pipeline and it is our goal to bring it to financial close in 2026. We recognise the value that this project will bring to South Australia and, more broadly, the transition to the renewable energy based grid of the future.

2. About Magnetar

This project is jointly owned by Magnetar and OX2, having originally been developed by Lyon Solar. Magnetar is a US headquartered alternative investment firm with offices in Evanston, New York and London. Magnetar was founded in September 2005 and currently has approximately $12.4bn of assets under management.

3. Project Background

The Project is a large scale solar and battery energy storage system (BESS) approved to be located approximately 10 km east of Morgan and 2 km north of Cadell. (Refer to Appendix B for a location map).

A development application was submitted for the Project by its original proponent, Lyon Solar Pty Ltd as trustee for the Lyon Solar Unit Trust (now in liquidation), on 11 July 2017. The Project was granted Crown sponsorship by the Department of the Premier and Cabinet on 11 July 2017 in accordance with section 49 of the *Development Act 1993* (refer to Appendix C) and was approved by the Minister for Planning on 27 November 2017 (refer to Appendix D) (Development No: 711/V030/17). The nature of the proposed development is described in the approval as:

"Large scale 330 MW solar farm, with 400 MW of battery storage, located approximately 10km east of the River Murray township of Morgan. A 132 kV substation would also be constructed, with a grid connection to the existing North West Bend to Monash 132 kV transmission line. A site office, maintenance building, ablution block, parking area, undercover storage area and waste storage area would also be built. A temporary construction compound and materials laydown area would be established for the construction phase."

Refer to Appendix E for the preliminary layout plan considered as part of the original development application.

In accordance with Obligations Pursuant to the *Development Act 1993* and Development Regulations, the development approval required the following:

- *"The development must be substantially commenced within 12 months of the dates of this Notification, unless this period has been extended by the State Commission Assessment Portal."*
- *"The authorisation will lapse if not commenced within 12 months of the date of the Notification"*
- *"The applicant is also advised that any act or work authorised or required by this Notification must be completed within 3 years of the date of the Notification unless this period is extended by the Panel"*

The lack of progress in Lyon's business ultimately led to it being placed in liquidation. On 18th December 2019, Lyon was notified by Department of Planning, Transport and Infrastructure that its request for an extension had been placed 'on hold' pending resolution of outstanding matters including the payment of Development Application Fees totalling $202,502.85.

Magnetar Solar was a minority equity owner of Lyon and provided the initial development capital for the Project. Magnetar Solar, via its Investment Manager, Magnetar Financial (UK) LLP, worked with the liquidators, Richard Hughes and David Orr (the Liquidators) to formalise the purchase of the Project with a partner, ESCO Pacific. The acquisition was complete in 2020.

ESCO Pacific made payment of the outstanding Development Application Assessment fees and the project was given an extension of time on 8 May 2020 (Refer Appendix F) with the operative dates to substantially commence and complete the development being:

a. On-site construction to be commenced not later than 30th June 2023.
b. Full completion of all project elements not later than 30th June 2025.

On 6 June 2023, ESCO Pacific requested an extension of time for the operative dates due to:

1. Project Energy Connect (the new interconnector between SA and NSW) not yet being constructed and fully energisation until 2025 (at the time this was considered a good connection option).
2. The Covid-19 pandemic resulted in limitations on travelling particularly during the period of 2020-2022 and restricted the abilities for technical specialists to undertake various studies, consultation and investigations on site.

On 7 August 2023, the extension request was granted by the authorised delegate of the Minister for Planning (refer Appendix G) with the operative dates extended to be:

a. On-site construction to have substantially commenced no later than 30 June 2025
b. Completion of development must occur no later than 30 June 2027

On 3 April 2025, OX2 requested support for a staged approach to construction of the Project and a 3 year extension of time to the development approval (Development No: 711/V030/17) was

granted for the Project on 27 November 2017. Stage 1 will include the delivery of the BESS, substation and associated infrastructure and works and Stage 2 includes the delivery of the 330MW PV component.

On 9 May 2025, the requested support for a staged approach to construction of the Project and a 3 year extension of time to the development approval was granted by the authorised delegate of the Minister for Planning (refer Appendix H) with the operative dates extended to be:

Table 1: Approved Extension of Time

	Stage 1 – BESS and associated infrastructure	Stage 2 – solar PV and associated infrastructure
Commencement of Construction	30 June 2028	30 June 2029
Completion of Construction	30 June 2030	30 June 2031

4. Request Rationale for variation to Stage 1 Riverland BESS Development Approval

Following OX2's acquisition of the Riverland Solar Farm and BESS Project in 2023, OX2 undertook a series of detailed assessments to determine the most appropriate connection strategy, given the presence of three transmission lines traversing the Riverland property. The options considered included connection via one or both of the 132kV North West Bend–Monash lines or connection via the new 330kV PEC line. At that time, OX2's preferred option was connection via the 330kV PEC line.

OX2 engaged ElectraNet to review these findings. As the PEC line was a newly commissioned interconnector, ElectraNet advised that connection to the 330kV PEC line was not feasible within the Riverland Property Boundary and could only occur at the South Australia/New South Wales border, more than 100 kilometres from the project site. Conversely, ElectraNet confirmed that connection could be achieved via the utilisation of both 132kV North West Bend–Monash lines traversing the site. On this basis, OX2 elected to proceed with the 132kV option and submitted an Extension of Time (EOT) and staging request to the South Australian Planning Authority in April 2025 [1].

Following the above, in August 2025 during a project meeting, ElectraNet strongly recommended against pursuing connection via the two North West Bend–Monash 132kV lines, advising that a 150 MW BESS connection would materially restrict ElectraNet's operation of these lines and would also be constrained under normal system conditions. This advice was later confirmed in ElectraNet's Connection Options Report, which stated that not only is the 330kV PEC line the preferred option, but connection to the PEC line is now feasible within the Riverland Property Boundary.

Based on this updated advice from ElectraNet, and following OX2's EOT and staging request in March 2025 [1], the project now requires a change in the point of connection within the Riverland property from the two 132kV lines to the 330kV PEC line to ensure the project's viability.

Given the above, OX2 is writing to request a Planning Variation for the Stage 1 Battery Energy Storage System, previously approved under Development No: 711/V030/17. The proposed changes include:

1. Modification of the transmission line connection point, changing from connection via the 2x 132kV North West Bend–Monash lines to the Robertstown–Buronga 330kV Project Energy Connect (PEC) line.
2. Shifting the location of the Stage 1 BESS Area to achieve this connection point. This includes moving areas allocated for the Stage 1 BESS, substation, switchyard and other connection infrastructure from property parcel CT 5990/945 Section 65 to CT 5990/945 Section 66 and CT 5990/945 Section 67.
3. To make the project commercially feasible at the new 330kV point of connection, an increase in the Stage 1 BESS capacity to 300MW/1200MWh (4-hour duration).

A preliminary layout plan prepared to support this Planning Variation is provided in Appendix I. This plan illustrates the revised indicative development footprint for Stage 1 of the Riverland BESS, including the BESS area, substation, switchyard, 330kV overhead transmission line and internal access tracks.

OX2 notes that the revised location of the Stage 1 BESS including the substation, switchyard and associated interconnection infrastructure remains within the same Project Site as described in Section 2: Project Description of the original Development Application [2]. The interconnection infrastructure such as the switchyard and the 330kV overhead transmission line is proposed to be located on property parcel CT 5990/945 Section 67. This parcel, together with CT 5990/945 Sections 65 and 66, forms the Property Boundary as defined in Table 2-1: Property Details and illustrated in Figure 2-1: Proposed Project Site in the original Development Application. Site access for Stage 1 BESS will continue to be via Morgan–Renmark Road and Woods and Forest Road, consistent with the previous Development Application.

Based on the amendments to Stage 1 BESS outlined above, OX2 requests a Planning Variation to modify the existing development approval to be able to obtain the required secondary consents to allow construction to commence.

5. Overview of Project amendment

On 6 November 2025, OX2 met with the Planning and Land Use Services team within the Department for Housing and Urban Development. During this meeting, the Department advised that a formal submission for a Planning Variation to the existing development approval is required to reflect the proposed project amendments. This submission needed to also include an updated Crown Sponsor support letter and updated OTR certificate, both of which are provided in Appendix A and Appendix J, respectively

In accordance with the Department's advice, OX2 provides a discussion around any additional considerations arising from the proposed amendments on the suite of studies previously undertaken as part of the approved Development Application (Development No. 711/V030/17). It is OX2's understanding that these updated considerations will be referred to the relevant agencies for review and consultation.

This Planning Variation will address how the proposed amendments interact with the original Physical Environmental, Biological Environmental, and Socio-Economic assessments. The following topic areas are detailed:

1. Geology and Soil
2. Water
3. Climate and Air Quality

4. Fire
5. Biological Environmental Assessment
6. Land Use
7. Aboriginal Heritage
8. Noise
9. Visual Impact
10. Traffic
11. Socio-Economic Environmental Assessment

5.1 Geology and soil

OX2 does not anticipate that the conclusions or recommended mitigation measures outlined in the original Geology and Soil Assessment [2], prepared as part of Development Application No. 711/V030/17, will change as a result of the revised BESS configuration or the areas proposed for the transmission line and switchyard infrastructure. As the updated Stage 1 BESS footprint remains within the study area assessed in the original Geology and Soil Assessment and within the Property Boundary approved under the original Development Approval, the existing commentary and recommendations relating to erosion and sedimentation, soil compaction and inversion, soil contamination, and associated mitigation and management measures remain applicable.

Accordingly, the requirements relating to geology and soils set out in the Conditions of Approval (refer Appendix D), including the Construction Environmental Management Plan (CEMP), Soil Erosion and Drainage Management Plan (SEDMP) and Operational Environmental Management Plan (OEMP), are not expected to change, as the conclusions and recommended mitigation measures of the original Geology and Soil Assessment remain suitable.

5.2 Water

OX2 does not anticipate that the conclusions or recommended mitigation measures outlined in the original Water Assessment [2], prepared as part of Development Application No. 711/V030/17, will change as a result of the revised BESS configuration or the areas proposed for the transmission line and switchyard infrastructure. As the updated BESS Stage 1 footprint remains within the study area assessed in the original Water Assessment and within the property boundary approved under the original Development Approval, the existing commentary and recommendations relating to water remain applicable.

Accordingly, the requirements relating to water set out in the Conditions of Approval (refer Appendix D), including the CEMP, SEDMP, OEMP and stormwater design are not expected to change, as the conclusions and recommended mitigation measures of the original Water Assessment remain suitable.

OX2 would also like to note that the revised footprint for the BESS, transmission line and switchyard infrastructure avoids the watercourse features identified under the original Development Approval (Development No. 711/V030/17).

5.3 Climate and air quality

OX2 does not anticipate that the conclusions or recommended mitigation measures outlined in the original Climate and Air Quality assessment [2], prepared as part of Development Application No.

711/V030/17, will change as a result of the revised BESS configuration or the areas proposed for the transmission line and switchyard infrastructure. As the updated Stage 1 BESS footprint remains within the Property Boundary approved under the original Development Approval, the existing commentary and recommendations relating to climate and air quality remain applicable.

Accordingly, the requirements relating to climate and air quality set out in the Conditions of Approval (refer Appendix D), including the CEMP and OEMP, are not expected to change as the conclusions and recommended mitigation measures of the original Climate and Air Quality Assessment remain suitable.

5.4 Fire

OX2 does not anticipate that the conclusions or recommended mitigation measures outlined in the original Fire Assessment [2], prepared as part of Development Application No. 711/V030/17, will change as a result of the revised BESS configuration or the areas proposed for the transmission line and switchyard infrastructure. The updated Stage 1 BESS footprint remains within the Property Boundary approved under the original Development Approval and continues to fall within the mapped Bushfire Protection Area under the Mid Murray Council Development Plan. Accordingly, the existing commentary and recommendations relating to bushfire risk remain applicable.

Measures for fire prevention, fire-fighting, site access and emergency response procedures will continue to be developed in consultation with the South Australian Country Fire Service (CFS) and incorporated into the relevant management plans.

Before submitting this Planning Variation, OX2 contacted the South Australian CFS to share its intentions and ensure early communication prior to the formal referral.

5.5 Biological Environmental Assessment

The Biological Environmental Assessment prepared for the original Development Application (Development No. 711/V030/17) was undertaken by T&M Ecologists in March 2017 [4]. This assessment included a desktop review of flora and fauna species of significance within a 10 km buffer of the site, as well as an on-site field survey. The field survey encompassed properties CT 5990/945 Sections 65, 66, and 67, along with contingency areas immediately east and northeast of the property boundary to account for potential infrastructure placement.

On 6 November 2025, OX2 met with the Native Vegetation Council Division of the South Australian Department for Environment and Water (DEW) to discuss OX2's proposed changes to the Stage 1 Riverland BESS. It was communicated that, as the revised Stage 1 BESS footprint remains within the original Biological Environmental Assessment study area, including the on-site field survey investigation area, no additional field survey work is required. OX2 was further advised that the previous biodiversity study remains adequate for determining vegetation and habitat impacts.

As the updated Stage 1 BESS footprint remains within the study area assessed in the original Biological Environmental Assessment and within the property boundary approved under the original Development Approval, the existing commentary and recommendations relating to vegetation, fauna, and associated mitigation and management measures remain applicable.

OX2 notes that ecological features identified in the original assessment, such as wombat warrens, continue to be avoided in the revised BESS, transmission line and switchyard locations. In addition,

the alignment of the revised internal access track is expected to result in reduced impacts on sensitive native vegetation communities, including *Eucalyptus gracilis*, *Eucalyptus socialis*, and *Sclerolaena* shrubland, when compared to the alignment proposed in the July 2025 request for a staged approach to securing SEB offsets [5].

Given the above, the requirements relating to native flora and fauna, weed and pest management, as set out in the Conditions of Approval (refer Appendix D), including the CEMP and OEMP, are not expected to change as the conclusions and recommended mitigation measures outlined in the original Biological Environmental Assessment remain applicable.

OX2 notes that, whilst no additional on-site survey is required, the Native Vegetation Council has advised that the Significant Environmental Benefit (SEB) offset credit requirements must be recalculated to reflect the revised development footprint. Following determination of this Planning Variation, OX2 intends to submit a formal request to the Native Vegetation Council to secure updated SEB offsets for the project, consistent with the revised footprint.

5.6 Land use

OX2 does not anticipate that the conclusions or recommended mitigation measures outlined in the original Land Use Assessment [2], prepared as part of Development Application No. 711/V030/17, will change as a result of the revised BESS configuration or the areas proposed for the transmission line and switchyard infrastructure. The updated Stage 1 BESS footprint remains within the Property Boundary approved under the original Development Approval and forms part of the same bundle of freehold farming land parcels that comprise the Project Site, as defined in the original Development Application. Accordingly, the existing commentary and recommendations relating to land use and associated mitigation and management measures remain applicable.

In line with this, the requirements relating to land use set out in the Conditions of Approval (refer Appendix D), including the preparation and implementation of the CEMP, SEDMP and OEMP, are not expected to change, as the conclusions and recommended mitigation measures of the original Land Use Assessment remain appropriate.

5.7 Aboriginal Heritage

The Aboriginal Cultural Heritage assessment [6] for the project was undertaken by Vivienne Wood Heritage Consultant and prepared as part of the original Development Application (Development No. 711/V030/17). The assessment comprised a desktop review of historical and archival sources, including a review of the Aboriginal Affairs and Reconciliation (AAR) Register, together with a pedestrian survey of the proposed development area undertaken in collaboration with representatives of the First Peoples of the River Murray and Mallee Region native title group (RMMAC).

The desktop assessment covered all land parcels within the approved Property Boundary, namely CT 5990/945 Section 65, CT 5990/945 Section 66 and CT 5990/945 Section 67. The pedestrian survey undertaken in 2017 primarily covered the solar farm footprint located within CT 5990/945 Section 65 and CT 5990/945 Section 66. Several artefacts and other cultural materials were identified during the survey, however these were located outside the approved development footprint.

Based on the outcomes of the background research, field survey and consultation with First Peoples representatives, Vivienne Wood's 2017 report [6] concluded that no sites of Aboriginal archaeological, anthropological, historical or cultural significance were identified within the proposed development area.

OX2 acknowledges that, while the original desktop assessment included property CT 5990/945 Section 67, the original pedestrian survey did not extend into the areas of this parcel now proposed to accommodate interconnection infrastructure associated with the Stage 1 BESS, including the switchyard and overhead transmission line.

To address this, OX2 has engaged RMMAC and Vivienne Wood Consulting to extend the study area of the original pedestrian survey to include the additional areas proposed for the Stage 1 BESS development footprint. This cultural heritage survey is scheduled to be undertaken on-site mid January 2026, in collaboration with representatives of RMMAC and will include a pedestrian survey of the proposed development footprint within CT 5990/945 Section 67, south of the 330kV PEC transmission line.

OX2 understands that a cultural heritage pedestrian survey is not required for the acceptance or determination of this Planning Variation and is progressing the on-site pedestrian survey as a separate workstream. Notwithstanding this, OX2 engaged RMMAC and Vivienne Wood Consulting to also undertake an updated Taa Wika search, which is provided as part of this Planning Variation submission (refer to Appendix K). The updated search identified no previously recorded Aboriginal heritage sites within the revised project areas. The closest recorded site (6829-8213) corresponds to site MGSF17_01, which was identified during the original survey.

Accordingly, the existing commentary and recommendations relating to Aboriginal cultural heritage in the original Development Approval, including the associated mitigation and management measures, continue to apply, and the requirements set out in the Conditions of Approval (refer Appendix D) are not expected to change.

5.8 Noise

The Environmental Noise Assessment prepared as part of the original Development Application (Development No. 711/V030/17) was supported by an operational noise assessment undertaken by Sonus [7] and investigated the combined noise from the operation of noise sources likely to be associated with the project. The original assessment evaluated noise emissions from the BESS units located along the western boundary of the project site and confirmed compliance with the 35 dB(A) noise limits specified under the Environment Protection (Noise) Policy 2007.

The Noise Assessment commented that the closest permanent noise-sensitive receptors are residences located in and near Cadell, with the nearest two residences situated adjacent to the Murray River. These receptors were identified as being more than 1.3 km to the south-west and south of the site boundary, and approximately 1.5 km from the preliminary location of the closest project infrastructure.

Under the original configuration, the nearest noise-sensitive receptor was located approximately 3.8 km from the BESS infrastructure. Under the proposed revised Stage 1 BESS configuration, the BESS site has been relocated approximately 2 km north-east of the previous location assessed in the original Environmental Noise Assessment. As a result, the closest noise-sensitive receptor is

now approximately 5 km from the BESS infrastructure, representing an increase in separation distance of approximately 1.2 km relative to that assessed in the approved Noise Assessment.

While OX2 acknowledges that the number of BESS units differs from the original assessment, given the increased separation distance to the nearest noise-sensitive receptors and the location of the revised BESS, switchyard and transmission line infrastructure, the conclusions of the original Noise Assessment remain applicable.

On this basis, the mitigation and management measures identified in the approved Noise Assessment remain applicable and as a result, the noise-related requirements specified in the Conditions of Approval (refer Appendix D), including the CEMP and OEMP, are not expected to change.

5.9 Visual

The Visual Assessment, prepared as part of the original Development Application [2], evaluated the existing visual amenity and landscape and included an analysis of selected viewpoints from a number of publicly accessible locations surrounding the project site where all or part of the development would be visible.

The assessment concluded that there were few publicly accessible locations from which the development would be visible, including Morgan–Renmark Road to the south, Woods and Forest Road to the west, and certain locations near Cadell. Under the revised Stage 1 BESS configuration, the BESS footprint and interconnection infrastructure have been relocated further from Morgan–Renmark Road, Woods and Forest Road and the township of Cadell. On this basis, OX2 considers that visual amenity impacts will be reduced relative to those identified in the original assessment.

To support the assessment of this Planning Variation, OX2 has included indicative elevation drawings for Stage 1 BESS infrastructure such as the BESS units, inverter and transformer (refer to Appendix L). OX2 would like to note that the BESS and inverter OEMs are yet to be confirmed, and the drawings are provided for general reference only. While container and inverter dimensions are indicative, significant variations are not anticipated. Additionally, the transformer drawing provided is sized at 220kV/33kV and as the Riverland transformer is expected to be 330kV/33kV, this may result in an increase of approximately 1000mm compared to the elevation drawing provided.

Indicative general arrangement drawings have also been included in Appendix L for other key equipment such as the substation and switchyard. OX2 notes that elevation drawings for these components are typically prepared during the detailed design phase and is therefore difficult to be provided at this stage. However, to assist in review indicative substation heights can be expected to be approximately 8–9m for transformers and busbars, with gantries reaching up to around 15m. Lightning masts and may exceed these heights if required. Further details on heights and elevations will be able to be provided as design progresses.

OX2 would also like to note that community consultation undertaken to date has indicated minimal local concern regarding potential visual impacts associated with the project.

Based on the above, OX2 does not anticipate any changes to the conclusions or recommended mitigation measures outlined in the original Visual Assessment prepared as part of Development Application No. 711/V030/17. The existing commentary and recommendations relating to visual amenity, including associated mitigation and management measures, remain applicable under the revised Stage 1 BESS configuration.

Accordingly, the visual-related requirements specified in the Conditions of Approval (refer Appendix D), including those within the CEMP and OEMP, are not expected to change.

5.10 Traffic

The Traffic Assessment prepared for the approved Development Application (Development No. 711/V030/17) was supported by a Road Impact Assessment undertaken by Advisian [8]. The assessment included an evaluation of the existing road network, project traffic generation estimates and an assessment of the project's impacts on the surrounding road network.

OX2 provides the following commentary in relation to traffic impact considerations associated with the proposed alteration to the Stage 1 BESS configuration:

1. Under the revised Stage 1 BESS configuration, OX2 anticipates that the BESS construction traffic profile will vary from the previously approved development, reflecting the increased BESS capacity. Importantly though, due to the staged delivery of the Riverland Solar Farm and BESS project, BESS construction traffic will not coincide with solar construction traffic and as a result overall traffic impacts are expected to be comparatively reduced, with lower peak construction traffic volumes.

2. It is anticipated that the substation transformers will be the highest and widest loads to be delivered to site and may require transport via heavy and/or oversize transport vehicles, governed by oversize vehicle permit regulations. OX2 would like to note that as the Project's capacity is intended to increase, there will be an associated increase in transformer size and hence heavy and/or oversize transport vehicles requirements. While final dimensions are not yet confirmed due to ongoing detailed design, indicative transformer drawings have been provided in Appendix L to assist the review of this Planning Variation request. It should be noted that given the 330kV connection voltage, one potential configuration may involve utilisation of two of the transformers outlined in Appendix L. (Please also note the transformer drawing provided in Appendix L is sized at 220kV/33kV. As the Riverland transformer is expected to be 330kV/330kV, this may result in an increase of approximately 1000mm compared to the elevation drawing provided).

3. The primary construction access point is proposed to remain on the southern boundary of the project site, directly off Morgan–Renmark Road, consistent with the initial Traffic Assessment [8] and the approved Conditions of Approval (refer Appendix D). Conditions associated with the intersection treatment are also anticipated to remain unchanged and will comprise a sealed intersection with BAL and CHR(S) treatments.

4. The internal project access track to the Stage 1 BESS, substation and switchyard has been revised since the April 2025 request for EOT and Staging Approach [1] to reflect the revised BESS location. OX2 has redesigned the internal access track to provide a more direct route from the site access point to the BESS area. The indicative internal access track is provided as part of the layout provided in Appendix I. These changes to the internal access track will be achieved through the following:
    a) Primary access (construction traffic) - via a perimeter track predominantly along the eastern property boundary of CT5990/945 Section 65 within the road reserve.
    b) Secondary access (light vehicles only) - via a perimeter track predominantly along the northern boundary of CT5990/945 Section 65.
    c) Indicative internal access track width - OX2 expects internal access tracks to typically be in the order of 6-10m in width, consistent with the initial Development Application

[2]. OX2 has allowed for a conservative disturbance footprint of up to 15m in width to accommodate construction activities, OSOM requirements and any unforeseen constraints. It should be noted that the 15m width represents the disturbance footprint only and not the operational track width. The disturbance footprint associated with the internal access tracks will be appropriately incorporated into the SEB offset calculations. Further, the alignment of the revised internal access track is expected to result in reduced impacts on sensitive native vegetation communities (including *Eucalyptus gracilis*, *Eucalyptus socialis*, and *Sclerolaena* shrubland) when compared to the alignment proposed in the July 2025 request for a staged approach to securing SEB offsets

5. Intended transport routes for Construction equipment, building materials and project components remain unchanged to the initial Traffic Assessment [8].

Before submitting this Planning Variation, OX2 reached out to the South Australian Department for Infrastructure and Transport to share its intentions and ensure early communication prior to the formal referral.

5.11 Socio-economic Assessment

OX2 does not anticipate that the conclusions or recommended mitigation measures outlined in the approved Socio-Economic Assessment, prepared as part of Development Application [2], will change as a result of the revised Stage 1 BESS configuration. The updated Stage 1 BESS footprint remains within the Property Boundary approved under the original Development Approval and forms part of the same bundle of freehold farming land parcels that comprise the Project Site, as defined in the original Development Application. Accordingly, the existing commentary and recommendations relating to Socio-Economic impacts and associated mitigation and management measures remain applicable.

In line with this, requirements relating to the Socio-economic Assessment set out in the Conditions of Approval (refer Appendix D) are not expected to change.

Summary

OX2 recognises the Project as key in our development pipeline and we are committed to moving forward with the Project. OX2 has a proven and demonstrable track record of delivering utility scale solar in the Australian and European markets.

We appreciate your consideration of our proposal. If you have any questions, please do not hesitate to reach out to the undersigned.

Sincerely,

Catherine Way
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References

[1] O. A. P. Ltd, “RE: Request for support for a staged approach to delivery and an extension of time – Riverland Solar Farm and Battery Energy Storage System (Development No: 711/V030/17),” 3 April 2025.

[2] E. &. C. Services, “RIVERLAND SOLAR AND STORAGE PROJECT - Development Application,” 12 July 2017.

[3] T. Ecologists, “Ecological Assessment to Support Native Vegetation Clearance Application,” June 2017.

[4] OX2 Holdings Australia Pty Ltd, “Request for support for a staged approach to securing the SEB offset requirements for Riverland Solar Farm and Battery Energy Storage System (Ref:NVAP Mtg 79 Item 3.3),” 23 July 2025.

[5] V. a. W. C. Wood, “An Aboriginal Cultural Heritage Study of the Proposed Riverland Solar,” Report to ESG & Carbon Services, June 2017.

[6] S. P. Ltd, “Lyon Riverland Solar Project-Environmental Noise Assessment,” June 2017.

[7] Advisian, “Riverland Solar Farm and Storage Project Road Impact Assessment,” Advisian, 2017.

[8] S. A. D. o. P. a. Development, “Conditions of Approval; Development Application: 711/V030/17,” Crown Development and Public Infrastructure and Electricity INfrastruction Development Decision , July 2017.