



25 June 2025

The Department of Planning, Housing and
Infrastructure

Contact: Chris Dwyer
Our Ref: DA 52/2025/7/1
Your Ref: SSD-85939708

Attention: Cameron Ashe

Dear Cameron,

Request for Comment – draft SEARs SSD-85939708
Rothbury Battery Energy Storage System, Ausgrid
1309 Wine Country Drive, Rothbury NSW 2304

Thank you for the opportunity to comment on draft SEARs for the Rothbury Battery Energy Storage System (BESS) by Ausgrid at 1309 Wine Country Drive, Rothbury NSW 2304.

Council has reviewed the following documents:

- Scoping Report - Rothbury Battery Energy Storage System. AECOM. 10 June 2025
- Draft SEARs – DPHI Ref PAE-86019726

The proposed development comprises:

- Construction, operation, and maintenance of a BESS with a 135 MW maximum power output capacity with 4-hour duration (i.e. 540 MWh)
- Containerised battery units (148 units) and associated infrastructure, including inverters and medium voltage transformers
- 33 kV underground cable connection from the battery units to the existing Rothbury Zone Substation via a 33 kV underground cable
- Combined switch room and control room building
- Ring Main Units (RMU)
- Onsite workshop facility
- One auxiliary transformer
- Backup diesel generator
- Onsite car parking

The Scoping Report and draft SEARs appear to address most environmental planning issues arising from the proposal, however the following matters are raised to assist DPHI in developing comprehensive SEARs.

t: 02 4993 4100 f: 02 4993 2500

p: PO Box 152 Cessnock NSW 2325

e: council@cessnock.nsw.gov.au w: www.cessnock.nsw.gov.au

ABN 60 919 148 928

Strategic Planning

Council supports energy storage and firming capacity proposals that would increase stability of the electricity network, and assist in the transition from fossil fuel to renewable energy, but only where the environmental impacts of the proposal are acceptable.

The site selection adjacent site to existing energy infrastructure is noted, however the site is also located in a highly visual rural locality, within Cessnock's Vineyard District, and on a flood prone site.

The Scoping Report at 2.1.8 identifies some relevant priorities of Council's Local Strategic Planning Statement (LSPS) however it overlooks other Planning Priorities such as Council's objectives of protecting rural land from incompatible development (Planning Priority 8); developments minimise environmental impacts and respond to site environmental characteristics and natural hazards (Planning Priority 21); rural landscape is retained and enhanced (Planning Priority 22); and the scenic and rural landscape of our Vineyards District is preserved (Planning Priority 23).

It is requested that the SEARs require the EIS to address all relevant strategic plans and statements including the Cessnock LSPS either under the 'strategic justification' or 'detailed evaluation of the merits' sections.

Cumulative impact

The Scoping Report at 6.11 notes that cumulative impacts may arise and identifies SSD and SSI developments within 10km of the site.

In addition to the developments identified, Council is aware of a proposal for a significant development on land adjoining the site to the north – the "Sunshine BESS" (**Figure 1**).

The proposed Sunshine BESS is currently undergoing pre-SEARs community consultation and Ausgrid/AECOM may not have been aware of the proposal at the time of writing the Scoping Report. A summary of the proposal may be found here [Avenis Energy Sunshine Estate BESS Factsheet](#)

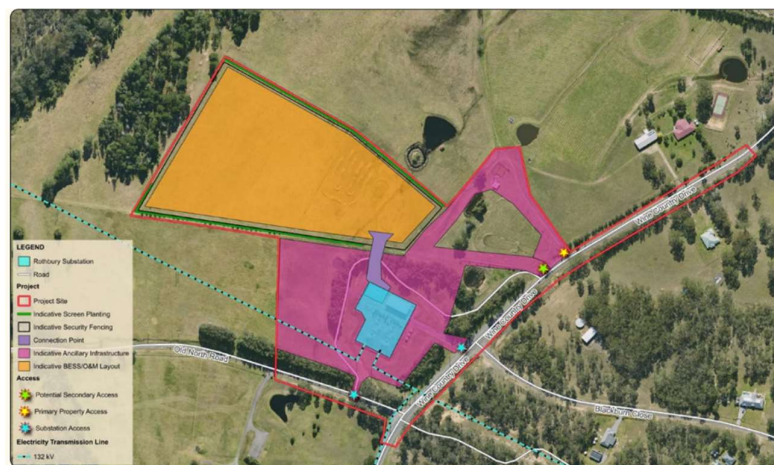


Figure 1 – Proposed Avenis “Sunshine” BESS adjacent to the subject site

Of particular concern is the cumulative visual (and possible noise, traffic, and hazards) impacts if both the Ausgrid and Avenis proposals are realised.

The draft SEARs address this issue by requiring *an assessment of the likely impacts of all stages of the development (which is commensurate with the level of impact), including any cumulative impacts of the site and existing, approved or proposed developments in the region and impacts on the site and any road upgrades, taking into consideration any relevant legislation, environmental planning instruments, guidelines, policies, plans and industry codes of practice including the Cumulative Impact Assessment Guideline (DPE, 2022).*

The Scoping Report does not address the proposed Avensis development, and it is requested that the proponent be reminded of the requirement to consider relevant cumulative impacts in the EIS.

Environmental Health

Waste Management

The site is not serviced by reticulated water or sewer. Whilst the proposal includes a largely unmanned operation, there will be periods when it will be staffed and provision of essential services should be considered and addressed. Council would expect the construction management plans would address temporary facilities during construction phase.

The draft SEARs address water supply arrangements under 'Water and Soils' section. It is requested that the SEARs also require waste management (i.e. sewage management) to be addressed either under this section or under the 'Waste' section.

Lighting and Security

It is assumed that given the isolated nature of the site, 24 hour operation and being largely unmanned, site security will be a key issue, particularly lighting. Light spill should be considered at design stage to prevent and/or control impacts on sensitive receivers and the environment in general. It is requested that the SEARs require lighting and security to be addressed either under the 'Landscape and Visual' section or a new section for example, 'Security'.

Flooding and Stormwater

The site is flood prone, and the draft SEARs address flood risks at the 'Water and Soils' section. To further guide the EIS, it is requested that the SEARs identify impacts in a Probable Maximum Flood (PMF) event and include reference to the provisions of the Cessnock Local Environmental Plan 2011, Clauses 5.21 and 5.22. Specifically, the impact of flooding in a major storm event and PMF on the battery units (floating/relocation due to flood waters) should be addressed. If the battery units are raised above PMF, the visual impact assessment should take the increased height into account.

Stormwater flows from the development should be addressed in the draft SEARs, possibly under the 'Water and Soils' section. In this regard water quality parameters as set out in Council's Engineering Guidelines for Design and Construction should be referenced, and met.

Local Developer Contributions

The proposal is identified within the Benefit-Sharing Guideline 2024 for battery energy storage systems being a grid-scale rechargeable batteries that can store energy from different sources and discharge it into the electricity grid when needed. The draft SEARs

address this under the 'Economic and Benefit Sharing' section. If the proponent wishes to proceed with this pathway a voluntary planning agreement would be negotiated with Council.

Alternatively, should a benefit sharing planning agreement not be reached then the proposal would be subject to the Cessnock City Council s7.12 Contributions Plan 2017. Based on current information a total monetary contribution of \$2,650,000 would be applicable to the proposal.

It is requested that local developer contributions are addressed by the applicant through SEARs and the EIS, and/or by direct liaison with Council.

I trust the above information assists you in developing comprehensive SEARs for Ausgrid's Rothbury BESS project. Council looks forward to receiving the SSD and EIS for comment once it is formally lodged.

If you require any further information, please do not hesitate to contact me on telephone 02 4993 4254 or via email chris.dwyer@cessnock.nsw.gov.au.

Yours faithfully

A handwritten signature in dark ink, consisting of a stylized 'C' and 'D' followed by a long horizontal flourish.

Chris Dwyer
Principal Development Planner