



Your ref: SSD-85939708
Our ref: DOC26/ 398273-1

Gracie Jackel

Environmental Assessment Officer

Energy, Resources & Industry Assessments | Department of Planning, Housing and Infrastructure
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Subject: EIS Exhibition Engagement - Rothbury BESS (SSD-85939708)

Dear Gracie,

Thank you for your email request dated 19 June 2026 seeking advice from the Marine, Coastal, Estuaries and Flood (MCEF) branch of the Conservation Programs, Heritage and Regulation Group (CPHR) on EIS Exhibition Engagement - Rothbury BESS (SSD-85939708) .

MCEF has reviewed the information provided and considers that the proposal can proceed to the next stage of assessment provided the issues in this letter are addressed (see Attachment 1).

The flood assessment is considered to adequately address the flood modelling, flood impact and climate change requirements of the SEARs through the use of both local and regional flood models, assessment of existing and developed conditions, consideration of future climate scenarios, PMF modelling and provision of flood impact mapping. In addition, off-site flood impacts are minor and would not result in material increases in flood hazard.

If you have any questions about this advice, please do not hesitate to contact our Coast Estuary & Flood team at mcef.planning@dcceew.nsw.gov.au.

Yours Sincerely

Neil Kelleher
Senior Team Leader, Coast Estuary & Flood
Regional Delivery (Hunter Central Coast)
Marine Coast Estuary & Flood
Conservation Programs, Heritage & Regulation Group

17 July 2026

Attachment 1 - MCEF Comments

Rothbury Battery Energy Storage System

In preparing this advice MCEF has reviewed the following documents:

- Battery Energy Storage System – Rothbury, Water Impact Assessment, GHD for Ausgrid 16 April 2026 (WIA)

Key Assessment Issues

1.	<i>Residual PMF Flood Risk and Land Use Compatibility</i>	The flood assessment includes local and regional flood modelling and demonstrates that the proposed BESS pad is elevated above the critical future 1% AEP flood level (2080 SSP5-8.5) with freeboard. The assessment also demonstrates that the site remains subject to inundation during the PMF event, with high flood hazard affecting the site and surrounding road network. The report concludes that operational flood impacts are generally minor and would not result in material off-site flood impacts. Recommended action: <i>Provide additional justification demonstrating that the proposed land use is compatible with the residual PMF flood hazard and that risks associated with PMF inundation have been appropriately considered in the detailed design and operation of the facility.</i>
	<i>Extent and Timing</i>	Pre-determination

2.	<i>PMF Resilience of BESS Infrastructure</i>	The assessment demonstrates that the site would be inundated during the PMF event and that access roads would also be affected. While the flood assessment considers flood behaviour and impacts, it does not clearly demonstrate the resilience of battery containers, associated hazardous materials and ancillary infrastructure under extreme flood conditions. Council's advice specifically requested consideration of battery unit behaviour during major flood and PMF events. Recommended action: <i>Provide engineering justification confirming that battery units, transformers, hazardous material storage areas and associated infrastructure would remain stable, secure and environmentally safe during extreme flood events, including the PMF.</i>
	<i>Extent and Timing</i>	Pre-determination

3.	<i>Emergency Management and Flood Response Planning</i>	The assessment recognises that flood hazard remains within the broader site during extreme events and recommends development of operational procedures for personnel during flood events. However, evidence of consultation outcomes with Cessnock City Council and the NSW State Emergency Service (SES), as required by the SEARs, has not been provided within the assessment.
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		Recommended action: <i>Prior to determination, provide evidence of consultation with Council and the SES regarding flood emergency management arrangements, including procedures for site access, personnel safety, emergency response and contingency measures during extreme flood events.</i>
	<i>Extent and Timing</i>	Pre-determination

4.	<i>Construction Phase Flood Response Procedures</i>	Construction-phase flood impacts are considered to be negligible; however the assessment identifies potential risks associated with inundation of works areas, transport of sediment and construction materials, obstruction of flood paths by temporary works and restricted site accessibility during flood events. The report recommends preparation of a Construction Environmental Management Plan (CEMP) and Soil and Water Management Plan (SWMP) but does not identify specific flood-response triggers and actions for construction activities. Recommended action: <i>Ensure the CEMP and SWMP include construction flood response procedures, including trigger levels for cessation of works, flood forecasting and monitoring arrangements, management of stockpiles and temporary works, site evacuation procedures and measures to prevent mobilisation of materials during flood events.</i>
	<i>Extent and Timing</i>	Pre-determination