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Planning Report

Material Change of Use (Battery Storage Facility including ancillary infrastructure) and Reconfiguring a Lot (1 into 4 lots and Access easement) located at 837 Red Hill Road, Bororen (Lot 132 on FD700)



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Prepared for: The Chief Executive

Prepared on behalf of: Red Hill Renewable Energy Pty Ltd

Our Reference:	J001639:GE:SR
Site:	837 Red Hill Road, Bororen QLD 4678 Lot 132 on FD700
Date:	10 September 2026
Author:	Sera Rohan
Approver:	Sera Rohan / Evan Kruckow

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This Report has been prepared for Red Hill Renewable Energy Pty Ltd ACN 675 077 291 for the sole purpose of making a Development Application to the Department of State Development, Infrastructure and Planning (represented by the State Assessment and Referral Agency), seeking a Development Permit for a Material Change of Use (Battery Storage Facility including ancillary infrastructure) and Reconfiguring a Lot (1 into 4 lots plus access easement) on land at 837 Red Hill Road, Bororen and described as Lot 132 on FD700. This report is strictly limited to the purpose, facts and circumstances stated within. It is not to be utilised for any other purpose, use, matter or application.

Gilvear Planning has made certain assumptions in the preparation of this report, including:

a) That all information and documents provided to us by the Client or as a result of a specific search or enquiry were complete, accurate and up to date;
b) That information obtained as a result of a search of a government register or database is complete and accurate.

Gilvear Planning is not aware of any particular fact or circumstance, which would render these assumptions incorrect, as at the date of preparation of the Report.

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Signed on behalf of Gilvear Planning Pty Ltd,



Sera Rohan
PROJECT DIRECTOR
10 September 2026

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1.0 Project history

Red Hill Renewable Energy Pty Ltd (the 'Proponent' and 'Applicant') originally proposed the development of a 'hybrid' solar PV and Battery Storage Facility on the land at 837 Red Hill Road, Bororen, known as the Rutherglen Solar and Storage Project. A development application in respect of the hybrid project was lodged with Gladstone Regional Council ('Council') in August 2024 ('Rutherglen application').

Statutory public notification and community consultation took place in May 2025 resulting in Council receiving 6 properly (and 2 not properly) made submissions in respect of the Rutherglen application.

On 25 June 2025 the Queensland State Government passed the *Planning (Social Impact and Community Benefit) and Other Legislation Amendment Act 2025* that introduced the community benefit system into the planning framework and changed the assessment process for all wind and solar farms.

The Rutherglen application had not been decided when the changes came into effect. Consequently, under the *Planning Regulation 2017* (as amended) the application was taken to not be a properly made application.

As a result of the legislative change, the Proponent took the opportunity to rescope the project considering community feedback. The review resulted in a decision to remove all solar PV works from Rutherglen and scale back to a BSF only project (**Rutherglen Storage Project**). Under the new proposal, the BSF is consolidated into a 23 hectare area adjacent existing power lines in a central location within the 1,277 hectare property.

In October 2025, Red Hill Renewable Energy Pty Ltd submitted a development application to Gladstone Regional Council (Ref. DA/82/2025) for the Rutherglen Storage Project, seeking a Development Permit for Material Change of Use for an Undefined Use (Battery Storage Facility) and Substation and a Development Permit for Reconfiguring a Lot (Subdivision 1 into 3 and Access Easement) over the land.

Although not formally required at the time for BSF only projects, the Proponent nevertheless completed a Social Impact Assessment for the Rutherglen Storage Project and commenced negotiation of a Community Benefit Agreement with Council. This was undertaken in parallel with ongoing community engagement and consultation in relation to the rescoped 'BSF only' project. In addition to statutory notification requirements, engagement included two (2) public meetings and notifying adjoining landowners and those landowners within 1.5km of the site, as well as community groups and other identified stakeholders (33 in total).

On 12 December 2025, the State government introduced the *Planning (Battery Storage Facilities) and Other Legislation Amendment Regulation 2025*. As a result of the amendment – because the application had not been decided and was within the public notification period – the application was taken to not be a properly made application under section 51IA of the *Planning Regulation 2017* and not accepted under section 51 of the *Planning Act 2016*. Subsequently, Gladstone Regional Council issued the Applicant a letter on 15 December 2025 confirming the application was not properly made.

Since this time, the terms of a Community Benefit Agreement relating to the Rutherglen Storage Project have been agreed with Council and Council, at its meeting on 17 February 2026, agreed to support the

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execution of the agreement. The agreement was subsequently signed by all parties. A copy of the signed agreement is provided in Attachment 17.

On 4 February 2026, a new application seeking a Development Permit for Material Change of Use for an Undefined Use (Battery Storage Facility) over the land was lodged with the State Assessment and Referral Agency ('SARA'), but was deemed not properly made, as the application was not supported by the executed CBA.

On 5 February 2026, a separate application seeking a Development Permit for Material Change of Use for a Substation and a Development Permit for Reconfiguring a Lot (Subdivision 1 into 3 and Access Easement) was submitted to Council. This application was deemed not properly made, as Council was of the view the Substation was ancillary to the Battery Storage Facility and should be assessed by SARA as part of the first application. Council also advised that it would not consider the Reconfiguring a Lot application until after the Material Change of Use application has been decided.

The Proponent was subsequently advised by SARA that both applications could not be progressed and should be withdrawn until such time as the Minister determined the appropriate assessment manager for the proposed development applications. A request for determination under s48(6) of the Planning Act 2016 and s21(5)(b)(ii) of the *Planning Regulation 2017* was made to the Minister on 8 April 2026.

On 26 May 2026 the Minister determined that the combined assessment manager for the Material Change of Use (Battery Storage Facility, including an ancillary Substation) and the Reconfiguring a Lot is the Chief Executive of the *Planning Act 2016*. The Minister further determined that the Council should be a referral agency for the application submitted to the Chief Executive of the Planning Act, under Section 48(7) of the Planning Act, with its powers limiting to providing advice only.

Accordingly, this application in respect of the Rutherglen Storage Project is made to the Chief Executive (represented by State Assessment and Referral Agency), seeking a Development Permit for a Material Change of Use for a Battery Storage Facility (including ancillary infrastructure) and a Development Permit for Reconfiguring a Lot (Subdivision 1 into 4 lots including an access easement).

In reference to the requirements of s51(4) of the *Planning Act 2016*, a Social Impact Assessment for the project has been finalised and accepted by Gladstone Regional Council, and a Community Benefit Agreement with Council has been executed.

This report is accompanied by attachments, which have been updated to reflect State Code 27 and the relevant planning guideline, and includes an updated Community and Stakeholder Engagement Plan.

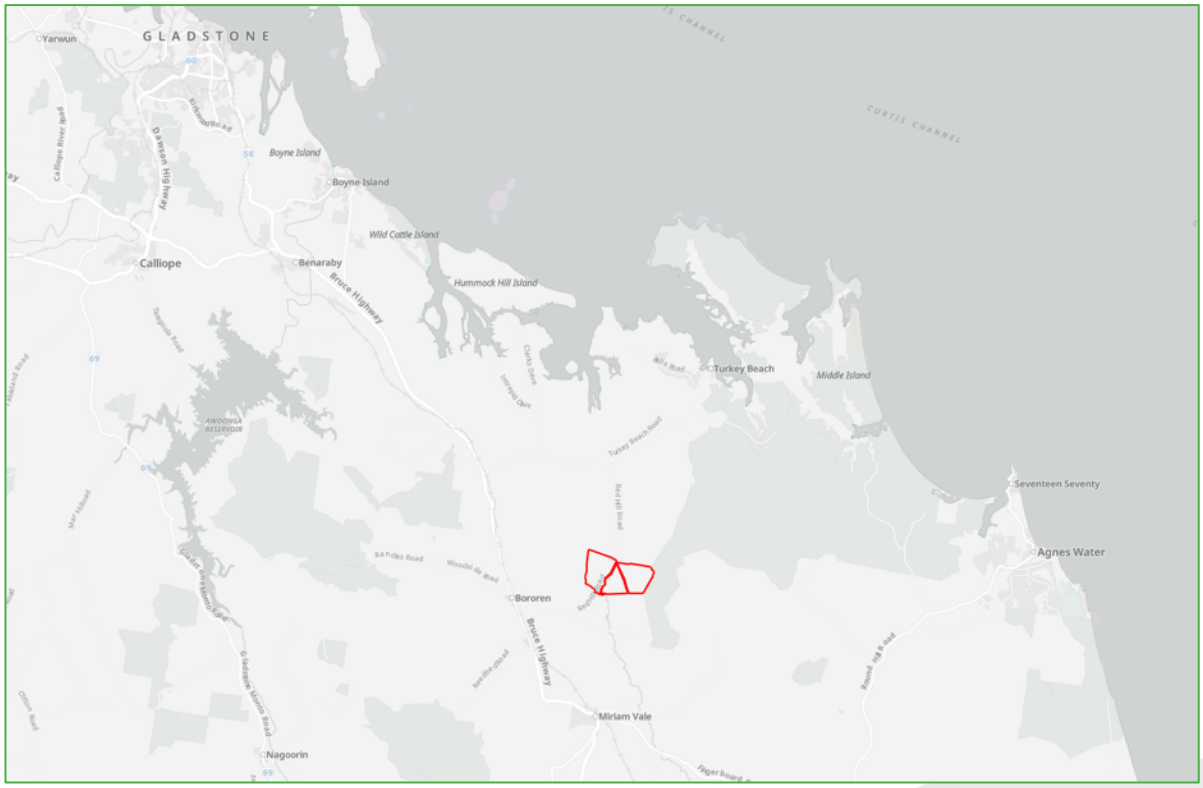
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2.0 Introduction

The following Planning Report has been prepared by Gilvear Planning Pty Ltd ('Gilvear Planning') on behalf of Red Hill Renewable Energy Pty Ltd ACN 675 077 291 ('RHRE') (the 'Applicant') in support of a Development Application submitted to the Chief Executive seeking a Development Permit for a Material Change of Use (Battery Storage Facility including ancillary infrastructure) and Reconfiguring a Lot (1 into 4 lots plus access easement) on land at 837 Red Hill Road, Bororen described as Lot 132 on FD700 (the project site).

The project site comprises a single lot which is described as Lot 132 on FD700, which has a total area of 1,277 hectares with frontage to Red Hill Road of 3km and to an unnamed, unconstructed road of 2.5km. As shown in Figure 1, the project site is located approximately 6km east of Bororen township, 10km north of Miriam Vale and 33km west of Agnes Waters, within the Gladstone Regional Council local government area. Currently, the site is used for cattle grazing, with a primary residence, caretakers dwelling and associated rural outbuildings.

Figure 1: Project site location



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It is proposed to develop part of the site (approximately 23ha) for the purposes of a Battery Storage Facility ('**BSF**') including ancillary infrastructure, notably a DCA Substation and High Voltage switchyard). To facilitate the proposed use, subdivision of the site into four (4) freehold lots is necessary to locate each individual component on separate allotments as follows:

- Lot 1 will include the BSF;
- Lot 2 will include the HV Substation ('**HV Substation**'), including a shared access road for the project components within Lots 1 and 4;
- Lot 3 is the balance lot; and
- Lot 4 includes the DCA Substation ('**DCA Substation'**).

Proposal Plans, showing the conceptual layouts intended to illustrate location of individual project components, are included within Attachment 1.

Pursuant to Schedule 10 of the *Planning Regulation 2017*, the application seeks approval from the Chief Executive for a Development Permit for Material Change of Use for Battery Storage Facility including ancillary infrastructure and a Development Permit for Reconfiguring a Lot (1 into 4 lots including access easement). Pursuant to Schedule 10, Part 2, Division 1, Table 1 of the *Planning Regulation 2017*, the development is Impact Assessable. As Proposed Lot 1, 2 and 4 are less than 250ha, Table 5.6.1 of the *Gladstone Regional Council Planning Scheme 2017* (v2.1) confirms the Reconfiguring a Lot component is Impact Assessable.

Detailed assessments have been undertaken for the project which has ultimately informed the layout, design and operational aspects of the project to ensure compliance with State Code 27 and Gladstone Regional Council planning scheme. The assessments demonstrate that the development has been designed and can be constructed and operated in a manner that minimises impacts on the existing environment, appropriately addresses the effects of noise, traffic/access, visual amenity, and safety matters on nearby sensitive land uses and receptors, minimises the loss or fragmentation of agricultural land and via an executed Community Benefits Agreement, will deliver positive benefits for the local and wider community over the life of the project.

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3.0 Summary

Table 1: Summary of Application

APPLICATION SUMMARY	
Address:	837 Red Hill Road, Bororen QLD 4678.
Real Property Description:	Lot 132 on FD700.
Site Area:	1,277ha.
Owner:	S&GH Super Pty Ltd A.C.N 615 273 777 – Refer to Certificate of Title in Attachment 2.
Applicant:	Red Hill Renewable Energy Pty Ltd ACN 675 077 291.
Easements & Encumbrances:	• Easement A on CPFD923, Easement B on FD922 to Powerlink • Refer to Certificate of Title in Attachment 2. • The site is not located on Contaminated Land – Refer to Contaminated Land Search in Attachment 2.
Proposal:	• Material Change of Use for Battery Storage Facility including ancillary infrastructure; and • Reconfiguring a Lot – Subdivision 1 into 4 lots and easement burdening Proposed Lot 2 and benefitting Proposed Lots 1 and 4 for access;
Approvals Sought:	Development Permit.
Category of Assessment:	Impact Assessable.
State Development Assessment Provisions:	State Code 27: Battery Storage Facility Development.
Referral Agencies:	Gladstone Regional Council.
Regional Plan Designation:	*Central Queensland Regional Plan 2013* – nil designation.
State Interests – State Planning Policy Mapping:	• Biodiversity - Matters of State Environmental Significance o Protected areas (estate) o Wildlife habitat (endangered or vulnerable, special least concern animal) - Regulated vegetation (Category B, C, R, essential habitat and intersecting a watercourse) • Natural Hazards Risk and Resilience

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APPLICATION SUMMARY	
	- Flood hazard area – Level 1 – Queensland floodplain assessment overlay - Flood hazard area (Local Government flood mapping) • Energy and Water Supply - Major electricity infrastructure (Powerlink)
State Interests – Referral Mapping:	• Queensland Waterways for waterway barrier works - Low and moderate waterways • Water Resources - Water resource planning area boundaries • Regulated Vegetation - Category B
Local Planning Provisions:	*Gladstone Regional Planning Scheme 2017* (v2.1): • Rural zone (no precinct); • No applicable Local Plan Area; • Biodiversity Overlay (Matters of State Environmental Significance – Regional Ecosystems, Essential Habitat); • Bushfire Hazard Overlay (Very High and High along western and eastern sides Medium and Buffer); • Building Heights and Frontages Overlay (adjoins area along eastern edge); • Regional Infrastructure Overlay (mid-section – Powerlink transmission line); • Scenic Amenities Overlay (Eastern section along steeper section); • Steep Land Overlay (Eastern section).
SARA Pre-lodgement Advice:	• Minutes of Pre-lodgement Meeting held with SARA on 15 January 2026 provided in Attachment 3. • Advice regarding the Pre-lodgement Meeting held with Gladstone Regional Council on 8 August 2025 provided in Attachment 3.
Specialist Reports:	• Attachment 1 – Proposal Plans by Gilvear Planning/Gryphon Energy. • Attachment 2 – Certificate of Title & Contaminated Land Search. • Attachment 3 – SARA and Council Prelodgement Meeting Minutes. • Attachment 4 – Ecological Constraints Letter by 4 Elements. • Attachment 5 – Risk Management Assessment and Fire Safety Study and Risk Assessment by Arriscar. • Attachment 6 – Flood Assessment and Stormwater Management Plan by WMS. • Attachment 7 – Traffic Impact Assessment and OSOM Concept by PTT. • Attachment 8 – Cultural Heritage Search. • Attachment 9 – Social Impact Assessment by ERM.

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APPLICATION SUMMARY	
	• Attachment 10 – Noise Impact Assessment by Matrix Acoustics. • Attachment 11 – Bushfire Mitigation Report by Eldon Bottcher. • Attachment 12 – MSES Report. • Attachment 13 – Wetland Mapping. • Attachment 14 – State Code 27 Compliance Responses. • Attachment 15 – Powerlink and Ergon Responses. • Attachment 16 – Infrastructure and Mining Report. • Attachment 17 – Community Benefit Agreement. • Attachment 18 – Agricultural Assessment – Gilbert and Sutherland. • Attachment 19 – Visual Impact Assessment – Charlton + Hayman Architects. • Attachment 20 – Ministerial Determination of Assessment Manager. • Attachment 21 – EPBC Decision Notice. • Attachment 22 – Butler Partners Geotechnical Report. • Attachment 23 - Decommissioning Plan • Attachment 24 – Community and Stakeholder Engagement Plan.

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4.0 Site Description

As shown in Figure 2, the project site comprises a single existing lot described as Lot 132 on FD700, which has a total area of 1,277 hectares. The project site is located approximately 6km east of Bororen township, 10km north of Miriam Vale, 33km west of Agnes Waters and 53km south-east of Gladstone, within the Gladstone Regional Council local government area.

There is a single Easement (Easement A on CPFD923 and Easement B on FD922) that traverses the property and contains high voltage electricity lines (Gin Gin to Calliope River). A 33kV Ergon line also traverses the site, although it is not contained within an easement. There are no other registered encumbrances on the site.

Topographically, the site is undulating with the Westwood Range forming the eastern boundary of the site and smaller hills along the western boundary. Aerial photography shows that the site has a concentration of vegetation along the eastern and western edges within the ranges as described above. The mid-section of the site contains scattered vegetation with large clearings. Killarney Creek forms the south-western border of the site with various smaller streams and drainage features throughout the site.

Red Hill Road and another unformed and unnamed road essentially divides the site into three sections. Access to the site is gained via Red Hill Road in the southern portion of the site, with other informal accesses elsewhere.

There is a homestead area with associated outbuildings and several dams located within the south-western portion of the site. A large portion of the site has been cleared, and this area is currently being used for pastoral purposes (i.e., cattle grazing) which is consistent with surrounding properties. Given the rural location, there is no formal reticulated infrastructure such as water or sewer, with electricity and telecommunications provided to the site.

There are no known infrastructure upgrades as affecting the site.

The location of the project site and immediate surrounding areas are shown on the aerial photograph provided in Figures 2 – 7 below.

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Figure 2: Aerial view of subject site showing easements and roads (Imagery: Queensland Globe)

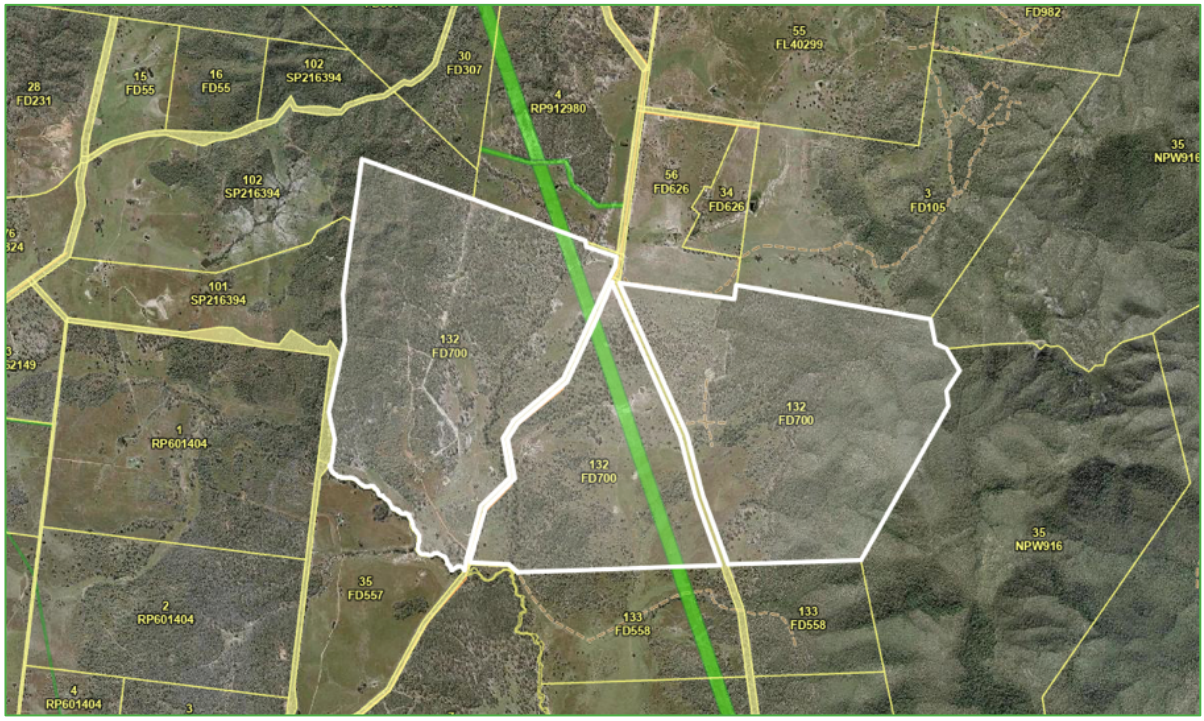


Figure 3: Killarney Creek crossing within Red Hill Road just south of the property access



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Figure 4: General view of Powerlink transmission lines traversing the property in the general location of BSF and substation



Figure 5: General view of homestead, associated outbuildings, dam and access (Imagery: Queensland Globe)



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Figure 6: General view of development area and transmission lines towards the north-eastern area of the property (looking south).



Figure 7: General view of project site looking towards Eurimbula National Park from the northern portion of the project site.



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5.0 Background

5.1 Pre-lodgement Advice - SARA

A formal pre-lodgement meeting with SARA officers was held on 15 January 2026 to discuss the project, approach, and technical inputs required. Minutes of the meeting are provided in Attachment 3. A summary of outcomes of that meeting, is provided in Table 2 below.

Table 2: Summary of application requirements

DISCUSSION POINTS	SARA RESPONSE	APPLICATION RESPONSE
a) In relation to PO2-PO7 is it a requirement to demonstrate access to water via a water license or other tenure? b) Does the provision of an agreement/letter from QFD with regard to access, etc., suffice for compliance with PO5?	a) In the instance, the development relies on a water license or other tenure for water supply for fire-fighting purposes, documentation to demonstrate that this water can be made available when needed should be provided to address PO7 of State code 27 of the State Development Assessment Provisions (State code 27 of the SDAP). b) With regard to access (PO5), you will need to prepare a Fire Safety Study (FSS), which demonstrates that cleared fire-fighting areas at the interface of hazardous vegetation or asset protection zones (APZ) are accessible. The measures should be justified as part of the overall fire safety strategy as described in the FSS, and the emergency response plan would be developed following consultation with QFD and reflecting the measures agreed in the FSS.	Arriscar have completed a Fire Safety Study and relevant Natural Hazard and Risk Assessments for the project (refer to Attachment 5). A copy of this study was provided to QFD on 8 May 2026. Confirmation that 2 x 180,000L (total of 360kL) water tanks of water are required for the project which is to be provided via above ground tanks, and appropriate fire pump/generator. This will initially be filled through water delivered to the site. Longer term, it is intended to provide an excavated basins within proposed Lot 1 for stormwater detention and containment. Attachment 1 includes proposal plans showing the indicative location of these water storage areas. Access to the site is provided via shared easement within Proposed Lot 2, benefitting Lot 1 and Lot 4 and will contain an 8m wide access to relevant standards. A 50m area around the infrastructure is also contained within each lot, and will be cleared and accessible, in addition to the spacing between

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		each container and other elements. Approval from Gladstone Regional Council for Operational Works will be required to construct the works; however the works are outside of a watercourse and therefore do not require a separate water license. Refer to section 7.6 of this report for further discussion.
In relation to compliance with PO8 and s51(4)(b) of the Planning Act, does the Community Benefit Agreement need to be fully executed? Or is a letter from Council sufficient.	The Community Benefit Agreement will need to be fully executed before SARA will accept the development application as properly made, in accordance with section 51(4)(b) of the *Planning Act 2016*.	A Social Impact Assessment has been completed by ERM and is included in Attachment 9. A fully executed Community Benefit Agreement is also provided as Attachment 17. An updated Community and Stakeholder Engagement Plan is also provided as Attachment 24. Refer to section 7.6 of this report for further information.
PO9 - Agricultural land - despite the land not being mapped as 'high quality agricultural land' as defined by the Code, will this need to be demonstrated by a suitably qualified person?	Applicants are required to submit an Agricultural Land Assessment (ALA) report that demonstrates the proposal does not result in an unacceptable loss of high-quality agricultural land. The ALA report should address the following: • identify whether the site contains high-quality agricultural land values (as defined in State code 27 of the SDAP) • clarify and map the amount of hectares of high-quality agricultural land the footprint of the BSF will impact • if the number of hectares of impacted	Gilbert and Sutherland have undertaken a preliminary Agricultural Land Assessment in accordance with State Code 27, and a copy is provided in Attachment 18. The report confirms that the land does not impact upon high-quality agricultural land. Refer to section 7.6 of this report for further discussion.

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	high-quality agricultural land is believed to constitute 'no unacceptable loss' - provide a short ALA report supporting this conclusion as evidence of compliance with PO9 - PO12. Please note: if the project footprint is expected to affect a material quantum (to be determined on a case-by-case basis) of high-quality agricultural land values, a comprehensive ALA must be prepared. Further information on what is included in a comprehensive ALA can be found in the Planning Guideline: State code 27: Battery Storage Facility.	
PO16-PO19 - when demonstrating 'buffers' - are these based on State Code 16 distances, or those stipulated in planning schemes, or other technical standards or simply by confirmation from an ecologist or engineer?	To demonstrate any buffers from waterways, wetlands and drainage lines for PO16-PO19, an Ecological Assessment Report and/or other specialist reporting should be prepared to support any proposed setbacks.	Setbacks to watercourses and Matters of State Environmental Significance are a minimum of 100m to any component of development. This is considered sufficient by the Ecological report prepared by 4 Elements included within Attachment 4. Refer to section 7.6 of this report for further discussion.
PO22-PO23 - Visual Impact - we have photomontages, and it is fully enclosed with an earth berm - is a VIAR required in that instance?	To demonstrate compliance with PO22, the project should be supported by a Visual Impact Assessment Report (VIAR) which details impacts on defined areas of high scenic and/or landscape amenity and surrounding sensitive receptors, and proposed mitigation measures to manage these impacts.	Please refer to Visual Impact Assessment prepared by Charlton + Hayman Architects within Attachment 19. Also refer to Section 7.6 of this report which discusses the impact of the project on viewsheds in the area.

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PO29-PO30 - is a letter from Powerlink required to demonstrate that 'appropriate electrical infrastructure is available'?	To demonstrate that the proposal has 'appropriate electrical infrastructure' and meets PO30, the development should be supported by a plan that shows the location of the indicative electrical connection. As part of the assessment process, 3rd party advice will be sought from Powerlink, and therefore engagement is encouraged and welcome to support the proposal. Connection and supply elements of the project to be delivered 'generally in accordance with' their depiction on an approved project layout plan.	Please refer to proposal plans included as Attachment 1 which show the proposed connection into the existing Gin Gin to Calliope River HV line within Easement A on CPFD923 275kV transmission line traversing the site; and previous responses from Powerlink and Ergon within Attachment 15.
a) PO31-35 Guidelines on decommissioning/battery recycling - are these still in development and when will they be released? b) What is the expectation at submission in relation to this with respect to Decommissioning Security Report?	a) SARA is currently preparing additional guidance on the requirements for the Decommissioning Security Report, including the timing of its provision and the management of commercially sensitive information. b) To demonstrate compliance with PO35, the project should be supported by a Decommissioning Security Report. This report needs to provide evidence of the proposed financial security (bonds, financial guarantees or similar) that will ensure compliance with decommissioning at the end of construction and at the end of operations, at no cost to landowners (that are not project operators) or the government.	Please refer to Attachment 23, which includes a Decommissioning Security Report for the proposal. Please refer to section 7.6 for further discussion.

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5.2 Pre-lodgement Advice – Council

A formal pre-lodgement Meeting with Council officers was held on 8 August 2025 to discuss the previous application approach, defined terms, and technical inputs required. It is noted that the advice was provided on the basis of a now superseded design. Follow-up advice received from Council regarding the meeting is provided in Attachment 3. A summary of outcomes of that meeting, focusing upon requirements and the application approach, is provided in Table 3 below.

Since this time, the Proponent continued to collaborate with Council in the formulation of a Social Impact Assessment (Attachment 9) and negotiation and execution of the Community Benefit Agreement (Attachment 17).

It is understood that Council will remain a referral agency for the application, with its powers limited to providing advice only.

Table 3: Summary of application requirements

DISCUSSION POINTS	COUNCIL RESPONSE	APPLICATION RESPONSE
Reconfiguring a Lot component	• Boundary lines should take into account waterways and potentially as of right clearing for bushfire firebreaks. • Council suggested that a long-term lease subdivision would better suit the temporary nature of the development and assist in consideration of the Rural Zone Code requirement to not fragment rural land/land uses.	Each freehold parcel has been designed to account for both Bushfire and Asset protection. Setbacks of a minimum of 100m to waterways and both mapped Matters of State and National Environmental Significance, as confirmed by 4 Elements, have been maintained for the project. There is a single waterway crossing which will be shared by all project lots (proposed lots 1,2 and 4) to minimise disturbance. At this stage, it is intended that the crossing will meet the Accepted Development Criteria for waterway crossings, subject to any future applications to Gladstone Regional Council for Operational works approvals. Each parcel has been designed to accommodate the components of the Rutherglen Storage Project – the Battery, the DCA Substation, the HV Substation and the shared access road. This has been informed by engagement with Powerlink and third parties, who

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		may ultimately construct, own and operate each component and the underlying land parcel. Freehold tenure for each project lot is the only 'bankable' option from a project structuring and financing perspective. A shared easement benefitting Lots 1 and 4 over a private road within Proposed Lot 2 is proposed to provide vehicular access for all three project lots to and from Red Hill Road. To support long-term land use outcomes for the property consistent with its existing rural zoning and to safeguard against unintended uses of proposed lots 1, 2 and 4 should the proposed development not proceed, it is proposed to title the lots only once the BSF and DCA Substation are constructed. Where Lot 2 (HV Substation) is required to be titled prior to construction commencing, it is proposed that a covenant under section 97A (6A) of the Land Title Act 1994 be placed over Lot 2 that limits the use of the lot to agricultural uses or, if lawfully permitted under a development approval, electricity infrastructure (HV Substation). Further discussion and justification is provided in section 6.0 and 7.6.
Biodiversity	Development should comply with the Biodiversity Code in relation to setbacks to waterways and minimise impacts in relation to waterway crossings that are necessary to service the development. An ecological assessment will be required to determine compliance with the Biodiversity code.	The development has been designed to avoid areas of mapped Matters of State Environmental Significance, including a minimum setback of 100m to the nearest watercourses. Access through the waterways is minimised by limiting vehicular access to a single shared access within that part of the mapped waterway which can accommodate a waterway crossing that complies with the accepted development criteria of the

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	Council indicated that revegetation/rehabilitation of waterways is an expectation of the Biodiversity Code and exact locations of this requirement will be a consideration of the Environment team as part of the assessment and imposition of reasonable and relevant conditions.	Waterway Barrier Works Code and is generally in a location that is currently utilised as a crossing. An ecological assessment is included within Attachment 4. On 26 March 2026 the delegate for the Minister for the Environment and Water decided that the proposed action to establish a battery storage facility and associated infrastructure on the subject site was not a controlled action under the EPBC Act and does not require further assessment approval under the EPBC Act before it can proceed. A copy of the EPBC decision notice is included within Attachment 21. Revegetation and stabilisation of the waterways within proximity to the development will be undertaken in accordance with Council's requirements.
Hazard and Risk assessment	Hazards report, including fire hazard will be a key document and will need to be aligned with the Bushfire Management Plan and Stormwater Plan etc.	A Risk Management Assessment Report (including a Fire Safety Study) has been undertaken by Arriscar in accordance with State Code 27, please refer to Attachment 5. Please also refer to the Flood Assessment and Stormwater Management Plan prepared by WMS at Attachment 6 and the Bushfire Mitigation Report prepared by Eldon Bottcher Architect at Attachment 11.
Application requirements	Proposal plans are required to ensure the application is properly made and should include (at a minimum): • Site plans • Elevation plans	Proposal Plans are provided at Attachment 1 and include: • Subdivision plans. • Layout plans showing typical arrangement of the HV Substation.

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	• Section plans • Earthworks plans	• Earthworks plans. We note that the Earthworks plans are conceptual in nature only, given that detailed engineering design is not yet complete.
Social Impact Assessment and Community Benefit Agreement requirements	Council have not yet developed a Social Impact process and/or Community Benefit program.	Council accepted the Proponent's Social Impact Assessment and executed a Community Benefit Agreement in accordance with Council's *Renewable Energy Community Benefits Sharing Policy* dated 7 October 2025.

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6.0 Proposal

6.1 Project Justification – State and Local Context

The Queensland Energy Roadmap 2025 is the most recent strategic framework which is intended to improve current energy assets and build what is required for the future to ensure an affordable, reliable and sustainable energy transition. It reinforces the Queensland Government's commitment to expanding renewable energy assets, with key initiatives including the establishment of Regional Energy Hubs to replace the previously identified Renewable Energy Zones, and the introduction of a new Code of Conduct. A core component of the Energy Roadmap focuses on private sector investment into new energy generation, including renewables developments.

Regional Energy Hubs will facilitate cost-efficient, shared transmission connections for new energy generation projects.

Relevant to the project site and Gladstone area generally, the Roadmap identifies:

- The 'Gladstone Project' as a priority project, which is intended to deliver essential network upgrades and reinforcement projects, with commissioning required by 2029 if not earlier to ensure ongoing system security and reliability in recognition of the planned closure of Gladstone Power Station.
- Planned upgrades of the existing transmission lines are also committed, including the Gin Gin to Wurdong and Gin Gin to Calliope River transmission lines (i.e. 'Backbone Transmission') which traverse the site.
- The projected closure of the 1,680MW Gladstone Coal Fired Power Station before 2035, will necessitate an increase in alternative generation projects supported by grid scale battery storage facilities to replace the baseload power generation lost from the closure of this and other coal fired power stations.
- By 2030, Queensland's energy system is expected to host at least 3.1 GW of short duration batteries or 2.4 GW more than in 2025 and by 2035, an additional 1.6 – 3.4 GW of medium-duration storage compared to 2025.

The Roadmap recognises the important and essential role battery storage facilities play in firming variable renewable energy, managing minimum system load and supporting coal unit reliability. It states:

> *In an increasingly variable energy system, a large amount of storage capacity will be required to shift energy from when it is produced to when it is required. This has material benefits on system efficiency, optimising generation and network investment requirements.*

The Rutherglen Storage Project will support the objectives of the Energy Roadmap by providing grid-scale storage capacity in a sparsely populated and largely unseen location that directly adjoins transmission lines, in an area that requires storage capacity to accommodate the projected increase in renewable energy within the region and provide support for baseload power.

The Rutherglen Storage Project will also deliver broader benefits.

Energy think tank Ember, in its latest electricity review, writes:

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"Batteries have outgrown their initial niche role as a grid stability service and are now core infrastructure designed to store excess daytime electricity and release it in the evening and at night."

In 2025, batteries reduced price swings on the energy spot market by shifting daytime supply to meet evening demand. The Rutherglen Storage Project, as an important addition to Queensland's storage capacity, will help shield the State from both global shocks and domestic demand surges, helping drive electricity prices lower for the benefit of all Queenslanders.

6.2 Project Description

The Rutherglen Storage Project is to be developed within a central part of the project site and specifically includes the following components:

- **Material Change of Use** including:

    a) **A Battery Storage Facility** (not more than 400MW) capable of both storing and exporting electrical energy and is electrically connected to the national grid (via a substation and HV Substation). This will be owned by the Proponent.

    b) **Ancillary infrastructure** including:

        - a DCA Substation ('**DCA Substation'**) that will be owned by the Proponent or a third party specialised asset owner. The DCA substation will contain 33kV/275kV power transformers. Its function is twofold - to receive the electricity from the Battery Storage Facility (in 33kV) and change the voltage of the electrical output (to 275kV) to distribute that power to the transmission network via the HV Substation when exporting; or to receive power via the HV Substation at 275kV and change the voltage to 33kV to distribute to the Battery Storage Facility when importing.
        - HV Switchyard ('**HV Substation'**) which provides for the control of electricity flow and accepts/imports the 275kV electricity from the DCA Substation and is the point of connection for the Battery Storage Facility via a 'cut in' (i.e. physical wires) into the existing transmission network. This enables Powerlink to switch circuits on or off, isolate faults and maintain grid stability. As a contestable asset under the National Electricity Rules (known as an "Identified User Shared Asset (IUSA)), the HV Substation may be owned and operated by the primary network provider (Powerlink), the Proponent or a specialised asset owner.
        - Internal transmission, cabling, and inverters.
        - Operation and maintenance facility and laydown area.
        - Utilities such as on-site sewer and water, including water tanks for fire and on site detention.
        - Security and fencing.
        - Carparking

- **Reconfiguring a Lot** to create four (4) lots as follows:

    a) Proposed Lot 1, which will have a total area of approximately 12.6ha and will accommodate the Battery Storage Facility, accessed via the shared easement within Proposed Lot 2.

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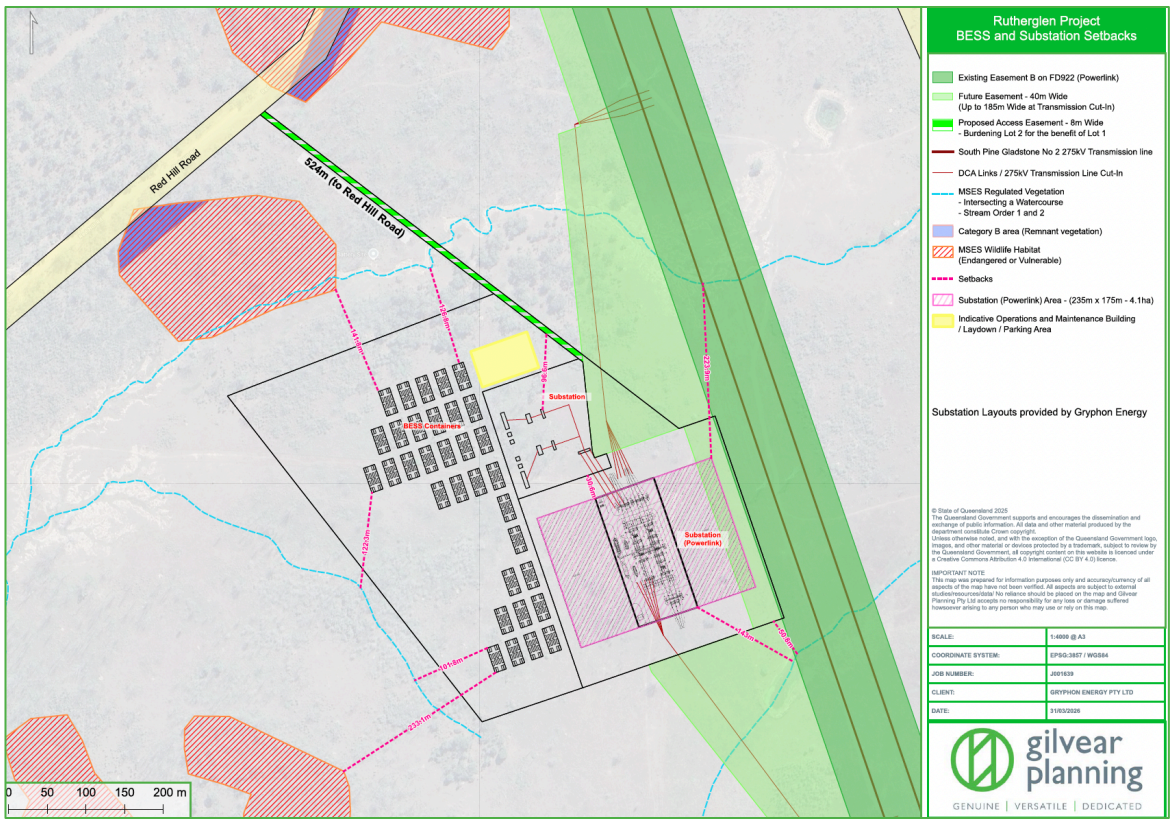
b) Proposed Lot 2, which will have an area of approximately 8.5 ha and will accommodate the proposed HV Substation. This lot also includes a shared access road to Red Hill Road benefitting Lots 1 and 4 via an access easement.

c) Proposed Lot 3, which is to comprise the balance area of approximately 1,254.1 ha which will continue to be used for agricultural purposes.

d) Proposed Lot 4, which will accommodate the DCA Substation and is approximately 1.8ha accessed via the shared easement within Proposed Lot 2.

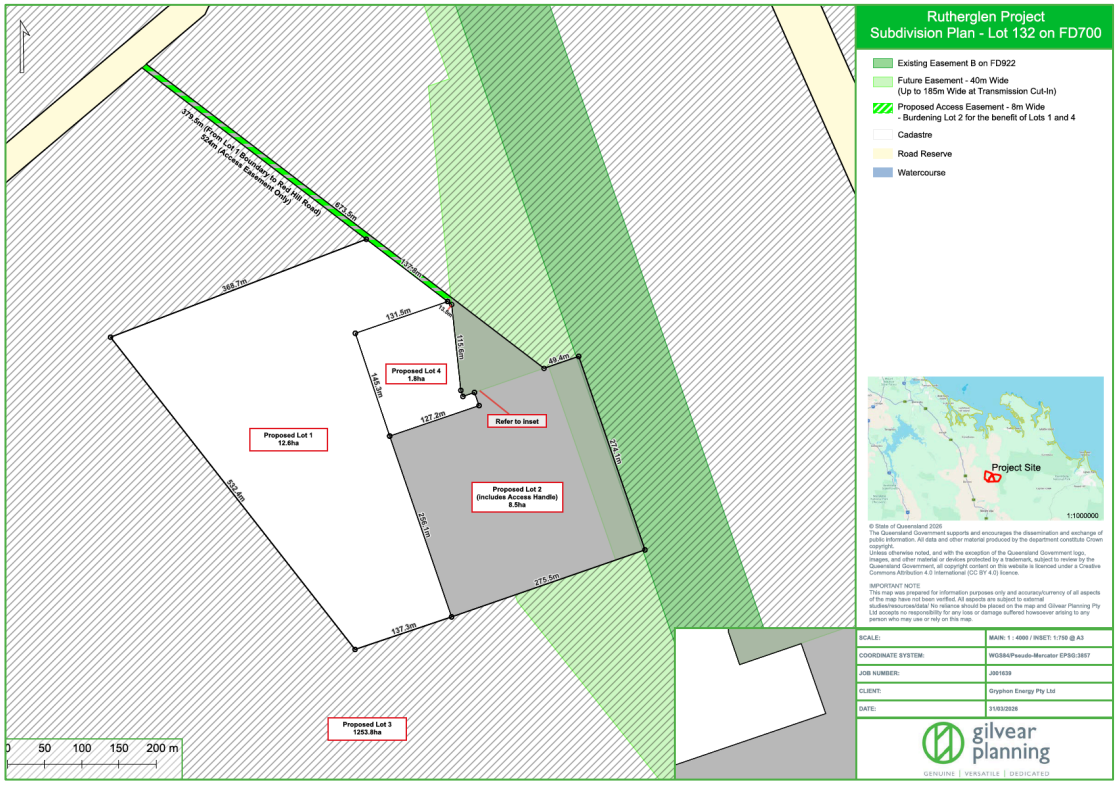
Proposal Plans are included in Attachment 1 and Figure 8, 9 and 10 below.

Figure 8: Concept Plan (Source: Gilvear Planning/Red Hill Renewable Energy).



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Figure 9: Concept Subdivision Plan (Source: Gilvear Planning/Red Hill Renewable Energy)



Due to the preliminary nature of the proposal, we note that:

- Operational Works applications for specific aspects of civil works will be made separately where required (internal roads, earthworks, intersection upgrades and the like).
- Access across watercourses will be required and at this stage, it is assumed access works can comply with the accepted development criteria for Waterway Barrier Works. Where compliance is not achieved, separate Operational Works applications will be made for waterway barrier works as well as associated approvals under other Acts if necessary.
- A separate application will be made for non-resident workforce accommodation, if such accommodation is required (at this stage it is not considered necessary).
- Final configuration and areas of the lots will be determined post detail and identification survey and detailed engineering design and will be subject to a separate compliance process.
- A future electricity easement adjoining the existing Powerlink easement is shown in the Proposal Plans; however, no approval is sought for this component and is shown for information purposes only.

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6.3 Detailed Project Components

The following sections provide further detail on the project components listed above.

6.3.1 BATTERY STORAGE FACILITY

A Battery Storage Facility ('BSF'), which will have a capacity of not more than 400MW, is intended to be located upon Proposed Lot 1, which contains a development area of approximately 12.6 hectares. The final capacity of the BSF will be the nameplate capacity (in MW) as agreed between the Proponent and Australian Energy Market Operator Limited (AEMO) on completion of grid studies. Each battery container is comprised of a 2.5MW/5MWh Lithium-Iron Phosphate ('LFP') battery. A single PCSM inverter is required for three (3) batteries. A total of 33 battery 'sections' of 15.192m x 33.384m (each consisting of twelve battery packs and four inverters) are proposed in a compact layout within the development area, separated by 10m gravel access paths. The final number of battery sections and battery packs will depend on the agreed nameplate capacity of the BSF and battery performance specifications. Both batteries and inverters will be mounted on concrete pillars/slab and will be housed within a steel container, such that no underground footings are required. Underground cabling will connect each section to the DCA Substation.

Figure 10 shows the indicative built form of typical battery and inverter components, and Figure 11 shows an artist's impression of a typical layout.

Figure 10: Individual inverter on the LHS and battery component on RHS



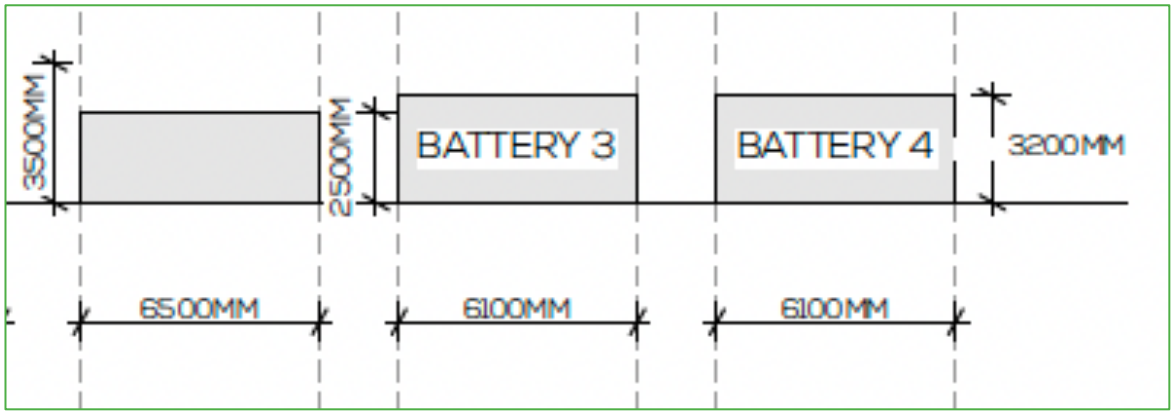
Figure 11: Artist render layout of a Rutherglen BSF and substation



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While the final technology decision has not been made, it is likely that the battery components will be up to 3.2m in height, 6.1m in maximum length and 2.4m in maximum width. Inverters would be up to 6.5m in length, 2m in maximum width and maximum height of 2.5m as shown in Figure 12.

Figure 12: Section of typical battery plus inverter layout which is repeated across the site



Lithium-Iron Phosphate or Lithium ferrous phosphate ('LFP') battery chemistry is an advanced subtype of Lithium-Ion battery known for its added safety features, high energy density and extended life span. LFP's are less prone to fires and thermal runaway when compared to Li-ion batteries through:

- In-built fire detection and (aerosol) extinguishment within each battery container;
- High insulation electrical design;
- Explosion proof mechanical design; and
- Higher level of monitoring through sensors and timely alerts.

Essentially, the current technology ensures that the potential for over-heating is limited through constant monitoring and early detection, diagnosis and troubleshooting of any errors in BSF performance.

6.3.2 ANCILLARY INFRASTRUCTURE

6.3.2.1 SUBSTATIONS

There are two 'Substations' proposed within the site – a Dedicated Connection Asset or DCA Substation and Identified User Shared Asset ('IUSA') Switchyard or High Voltage ('HV') Substation.

The DCA substation will contain 33kV/275kV power transformers and will be located within Proposed Lot 4, directly adjacent to the BSF within Lot 1. Its function is two- fold - to receive the electricity from the Battery Storage Facility (in 33kV) and change the voltage of the electrical output (to 275kV) to distribute that power to the transmission network via the HV Substation when exporting; or to receive power via the HV Substation (at 275kV) and change the voltage to 33kV to distribute to the Battery Storage Facility when importing. The DCA substation is an integral and essential component of the Battery Storage Facility- the BSF can't operate without it.

The DCA Substation (within Lot 4) will ultimately connect to the High Voltage ('HV') Substation within Lot 2. As a contestable asset under the National Electricity Rules (known as an "Identified User Shared Asset

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(IUSA)), the HV Substation may be owned and operated by the primary network provider (Powerlink), the Proponent or a specialised asset owner.

*[**Note**: The terms "HV Substation", "HV Switchyard" and "IUSA Substation" are often used interchangeably in this report and refer to the same thing. There is a slight technical distinction between switchyard and substation:*

- ***Switchyard**: Specifically refers to the yard itself where the switches, breakers, and busbars are located in the open air*
- ***Substation**: a broader term that includes the switchyard plus the indoor control buildings, relay systems, and automation software that coordinate everything]*

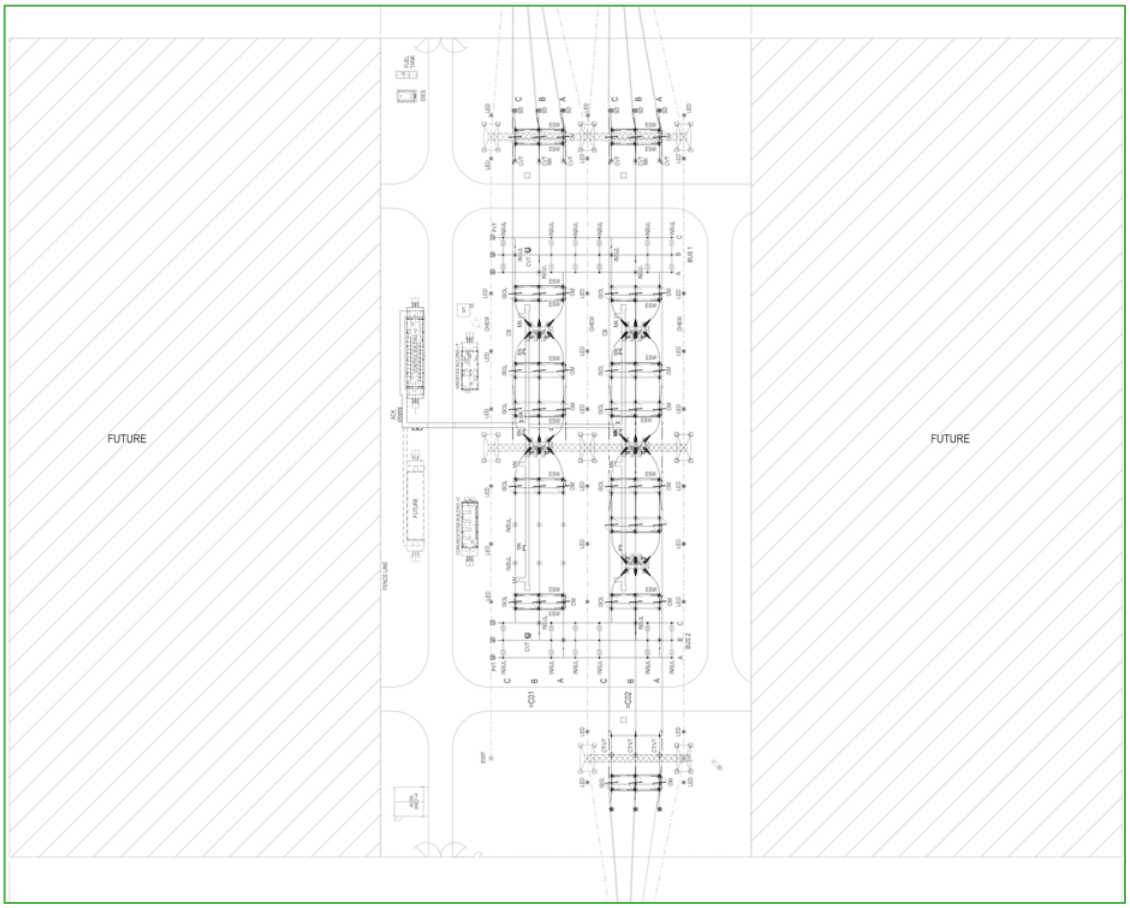
The HV Substation allows for the control of electricity flow. This enables Powerlink to switch circuits on or off, isolate faults and maintain grid stability. The HV Substation is the point of connection of the BSF (via the DCA Substation) via a 'cut in' into the existing Gin Gin to Calliope River HV line within Easement A on CPFD923 which adjoins the eastern boundary of the development. Like the DCA Substation, the HV Substation is an integral and essential component of the Battery Storage Facility, as it cannot operate without it.

The HV Substation for the project will be located within Proposed Lot 2, on the western side of Easement A. The set back of the switchyard from the existing Powerlink Easement allows for proposed widening of the electricity easement corridor associated with the proposed future upgrade of the existing transmission lines, including the addition of a third line (feeder 813). Appropriate setbacks from equipment and associated substation infrastructure is provided to accommodate the future easement expansion and future switchyard expansion as required by Powerlink (or a third party) as part of Preliminary Agreements. A copy of both Powerlink and Ergon's previous responses is provided as Attachment 15.

The final design for the HV Substation will be refined, in consultation with Powerlink, once the ultimate nameplate capacity, technology and layout for the Battery Storage Facility is determined during the detailed design phase of the project. From discussions with Powerlink, the HV Substation may include a layout similar to that in Figure 13 below.

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Figure 13: Shows the layout of a typical switchyard, including area for future expansion



6.3.2.2 OPERATIONS AND MAINTENANCE FACILITY

Operational and maintenance buildings will support the day-to-day function of the BSF and allow space for storage of plant and equipment, as well as office and meeting spaces to accommodate staff, contractors and visitors to the site. A nominal area within Lot 1 (BSF Lot) to the north of the DCA Substation (Lot 4) is provided to accommodate this. Although some co-sharing of facilities with the HV Substation is possible, it is currently proposed that the BSF will have its own operations and maintenance facility.

6.3.2.3 UTILITIES

On-going water requirements will be provided via the on-site water resources and if required supplemented by the provision of rain water tanks and pump/filter to provide water for drinking and servicing use. Where insufficient rainwater is received, rainwater tanks will be refilled via water tanker. All potable water will be provided in accordance with Australian Drinking Water Guidelines. It is expected that temporary maintenance staff will be responsible for individual supply of water when visiting the site.

An on-site sewerage collection and treatment facility will be provided to cater for the minimal permanent staff via domestic sewerage treatment systems. Construction staff will be provided with temporary facilities

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as part of the Construction Management Plan for the project. The following options exist for on-site sewerage systems:

- Conventional domestic sewage treatment plants (secondary treatment or better);
- Septic tanks (primary treatment);
- Composting systems;
- Holding tank with removal by tanker.

It is proposed that a conventional domestic sewage treatment infrastructure for the project will be provided. The location of the system will be determined during the final design phase of the project.

Water supply for firefighting purposes will also be provided on the site initially via 2 x 180,000L above ground tanks, fitted with appropriate fire pumps and connections as well as a generator; and then supplemented through the construction of stormwater detention ponds within Lot 1 which may also provide additional water storage if necessary as shown in the Stormwater Management Plan within Attachment 6.

6.3.2.4 SECURITY, FENCING AND LIGHTING

Security fencing will be installed around the perimeter of the BSF and substation with low intensity lighting (except as required for safety and emergency purposes). While the details of the final structure will be determined during detailed design, the initial proposal includes security fencing outside the immediate perimeter with the balance of boundary fencing to be developed with stock proof fence.

Signage will be clearly displayed identifying hazards present within the development areas. CCTV will also be used to manage security on the subject site. Such cameras will utilise night-vision technology that does not require external or flood lighting.

Lighting for the site will be compliant with Australian /New Zealand Standard AS/NZ 4282:2023- Control of Obtrusive Effects of Outdoor Lighting, or its latest version, and provides for:

- safety of personnel accessing the site at night time;
- security to deter unauthorised access; and
- emergency evacuation and emergency response purposes.

Low intensity external lighting will be utilised to minimise impacts on nearby sensitive receptors, including environmental receptors, noting that the Visual Impact Assessment Report determined that the development will be largely unseen by nearby sensitive receptors, refer to Attachment 19.

6.3.2.5 EARTHWORKS

Given the nature of the proposal and existing topography, earthworks will inevitably be required to create appropriately levelled areas for the battery modules and ancillary facilities. A conceptual earthworks plan is provided in Attachment 1. It is proposed to cut an average of 0.76m (1.99m maximum) and fill an average of 0.6m (2.21m maximum) across the area of development to achieve levels of between 52.86m to 61.7m RL's. A bund along the western side of the BSF is proposed at approximately 2.8m in height for a length of

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over 800m. Essentially, this will result in the proposed battery facility being located within an almost fully bunded area which will assist with noise, visual aspects and stormwater flows across the development site.

In addition, excavation is required to create necessary detention infrastructure that will be established on site to provide secondary containment for both stormwater and the full volume of fire-fighting water plus 24-hours of rainfall. This is subject to detailed engineering design in accordance with the Stormwater Management Plan in Attachment 6.

All construction activities will be undertaken with erosion and sediment control techniques in accordance with the best practice guidelines prepared by the International Erosion Control Association. Essentially, during construction, typical erosion and sediment control measures will be implemented, which will enable the provision of control drains to ensure conveyance and treatment of water prior to discharge into the natural environment. Temporary detention ponds will be provided as part of the initial earthworks in the same location as the future detention ponds, particularly through the earthworks phase of development. All works will be established, operated and monitored in accordance with the Stormwater Management Plan (refer to Attachment 6) as described below; in addition to site specific Erosion and Sediment Control Plans prepared for the project as a condition of any approval.

6.3.3 PROPOSED FREEHOLD LOTS

Having regard to the requirements of potential investors and Powerlink, it is proposed to establish the following freehold lots as shown generally in Figure 14 below and Attachment 1:

a) Proposed Lot 1 has a total area of approximately 12.6ha and will accommodate the Battery Storage Facility and Operational and Maintenance facilities which will be owned by the Proponent. Access to the Lot is via an Easement from Red Hill Road within Proposed Lot 2, which will contain a shared access road that is 8m wide and approximately 673m in length (about 524m to Lot 1). The shared access is intended to minimise the impact on watercourse crossings compared to each lot having its own access road.

b) Proposed Lot 2 has an area of approximately 8.5 ha and will accommodate the proposed HV Substation which will be owned by Powerlink, the Proponent or a third party operator. Powerlink or third party require a freehold title for the Switchyard and will not accept a long-term lease. Proposed Lot 2 will be accessed via the shared private road described above located entirely within Proposed Lot 2 and will have a 15m frontage to Red Hill Road. Powerlink will also be able to access the Switchyard from Red Hill Road via existing tracks within the existing Powerlink Easement (A on FD700 and B FD922). The lot has been designed to accommodate the future easements identified by Powerlink for the Gin Gin to Calliope River upgrade to the existing transmission network. The future easements do not form part of this application and are provided as indicative only.

c) Proposed Lot 3 comprises the balance of the land (approximately 1,254.1 ha), including the existing homestead, caretakers dwelling, farm sheds, access road, grazing activities, and future easements identified by Powerlink for the Gin Gin to Calliope River upgrade to the existing transmission line.

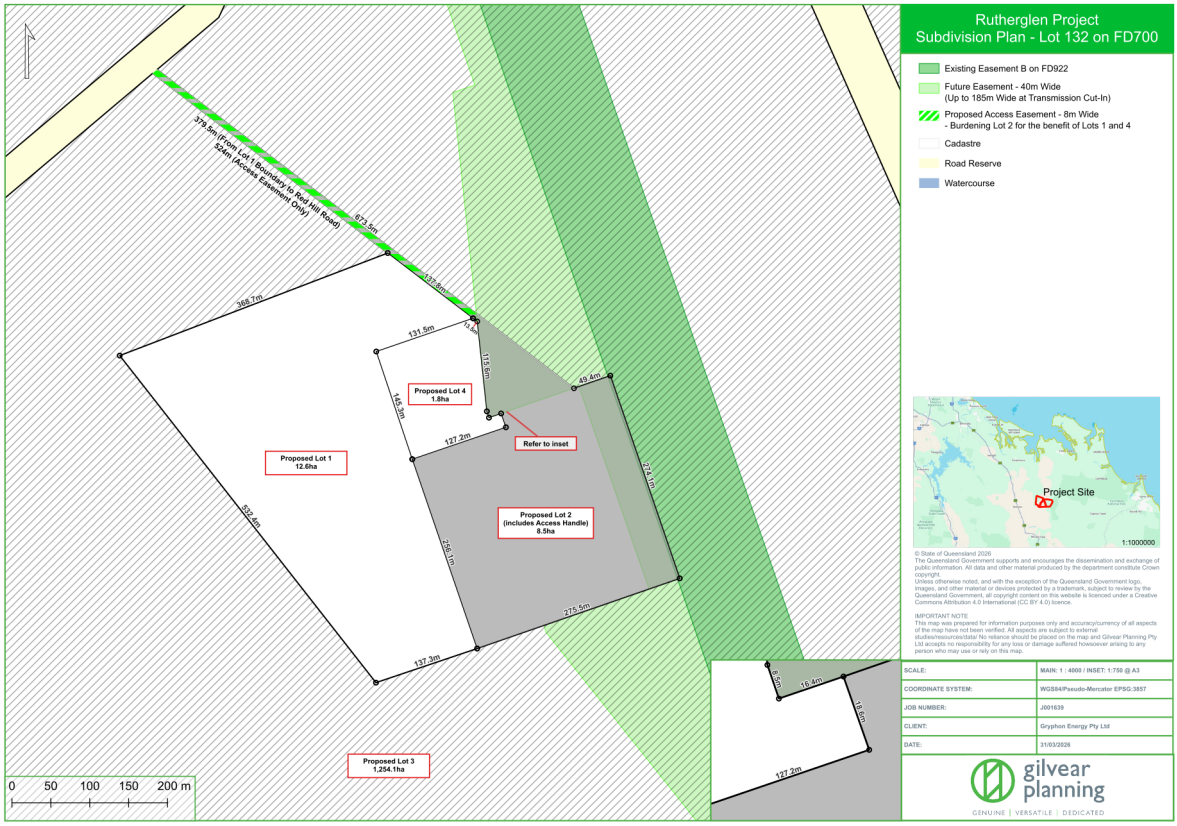
d) Proposed Lot 4 will contain the DCA Substation which will be owned by the Proponent or a third party. Access to Proposed Lot 4 is via an Easement from Red Hill Road within Proposed Lot 2,

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which will contain a shared access road that is 8m wide and approximately 673m in length (about 524 m to Lot 4).

The configuration and sizing of Proposed Lots directly reflects the requirements of project stakeholders and to ensure that there is sufficient land to accommodate the development, including fire breaks and asset protection areas, water supply and stormwater containment, as well as minimising the impacts to agricultural land.

Figure 14: Proposed subdivision layout



As part of ongoing engagement with Gladstone Regional Council, an issue regarding the timing of the subdivision was raised, and in particular, a preference to create the lots or undertake the Reconfiguration of a Lot component of the application only once the Material Change of Use has been approved and construction of the BSF has commenced.

To overcome Council's concern about creating small lots in a rural area and the risk of the lots potentially being used for unintended purposes, proposed Lots 1 and 4 will not be created until such time as construction of the BSF and DCA Substation are complete. Where Lot 2 is required to be created prior to the construction of the HV Substation, it is proposed that a Restrictive Covenant, in favour of the Local Government (per s97A of the *Land Title Act 1994*) is placed on title of Lot 2 that restricts the future use of the proposed lot. Restrictive covenants in Queensland are legally binding conditions placed on a property's title that limit how land can be used or developed. Once registered they bind all future owners. Under section 97A of the *Land Title Act 1994*, the covenant may only be in favour of the State, a State Government Entity

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or a local government (Council). The covenant must relate to land use, building use, or the protection of environmental or cultural features.

To support long-term land use outcomes for the property consistent with its existing rural zoning, it is proposed that a covenant be placed over HV Substation lot (Lot 2) that limits the use of the lot to agricultural uses or, electricity infrastructure if lawfully permitted under a development approval. Such a covenant would prevent the land from being used for other non-agricultural uses if the HV Substation does not progress or upon the decommissioning of the HV Substation. The grant of the covenant could be a condition of the development approval, as contemplated under section 97A (6A) of the *Land Title Act*.

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7.0 Statutory Planning Considerations

This section provides an overview of the legislative context of the application under the relevant provisions of the *Planning Act 2016* (the 'Act') and *Planning Regulation 2017* (the 'Regulation').

7.1 Planning Act 2016

7.1.1 CONFIRMATION OF DEVELOPMENT

The proposed development is not prohibited. This has been established by considering all relevant instruments which can provide prohibitions under the Act including:

- Schedule 10 of the Regulation;
- Relevant categorising instruments including *Gladstone Regional Council Planning Scheme 2017 (v2.1).*

7.1.2 DEFINED TERMS AND ANCILLARY INFRASTRUCTURE

The proposed Material Change of Use for which a Development Permit is required under the Act is "Battery Storage Facility", which is defined under Schedule 24 of the Regulation as follows:

> ***Battery Storage Facility*** *means the use of premises for the operation of 1 or more battery storage devices.*

A Battery Storage Device is defined as follows:

> ***Battery storage device*** *–*
>
> *(a) means plant that –*
>
> *(i) converts electricity into stored energy; and*
>
> *(ii) releases stored energy as electricity; and*
>
> *(b) includes any equipment necessary for the operation of the plant.*

The proposal includes ancillary infrastructure that is necessary for the operation of the plant, including a DCA Substation which will contain transformers and other equipment that convert electrical energy from one voltage to another, and a HV Substation (i.e. HV Substation) that switches the electrical current between circuits and connects the substation to the grid via a cut in to the existing power lines. These are essential parts of the BSF to ensure the energy can be imported to the batteries for storage and then exported to the grid. That is, the batteries cannot operate in the absence of the Substations and there is no need for the Substations without the batteries (i.e. each are co-dependent upon the other). Similarly, the internal transmission, cabling, inverters, operation and maintenance facility, laydown area, internal access roads and carparking and service infrastructure, such as on-site sewer and water are necessary for the operation of the plant and equipment.

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The second component is defined as Reconfiguring a Lot, being the creation of new freehold lots, including access easement benefitting Lots 1 and 4 over a private road within Lot 2 that provides vehicular access to and from a constructed road (Red Hill Road). Such lots are created to satisfy project structuring and financing requirements only, and do not change the operation of the uses as described above or the interdependency of the project components from a land use perspective.

7.1.3 ASSESSABLE DEVELOPMENT

In accordance with s43 of the *Planning Act 2016*, the development proposed by this application includes:

- Material Change of Use for a Battery Storage Facility that is made assessable under Schedule 10, Part 2, Division 2, Table 1 of the Regulation; and
- Reconfiguring a Lot that is made assessable under Table 5.6.1 of the *Gladstone Regional Council Planning Scheme 2017 v2.1*.

7.1.4 ASSESSMENT MANAGER

The Assessment Manager for this development application is the Chief Executive, represented by the State Assessment and Referral Agency (SARA), as determined by the Minister in accordance with section 48(6) of the Act and section 21(5)(b)(ii) of the Regulation.

Specifically, the Minister has further determined that Gladstone Regional Council should be a referral agency for the application, with its powers limited to providing advice only.

Please refer to Ministerial determination within Attachment 20.

7.1.5 CATEGORY OF ASSESSMENT

Pursuant to Schedule 10, Part 2, Division 2, Table 1 of the Regulation, the proposed Material Change of Use for Battery Storage Facility is Impact assessable. Further, Table 5.6.1 of the Gladstone Regional Council Planning Scheme (v2.1) confirms that the Reconfiguring a Lot component is Impact Assessable.

7.1.6 STATUTORY CONSIDERATIONS FOR ASSESSABLE DEVELOPMENT

The decision rules in the statutory framework of the Act for Impact Assessable applications are set out in section 45(5) and 60(3) of the Act and section 29 to 31 of the Regulation.

Section 45(5) of the Act states,

An impact assessment is an assessment that

(a) must be carried out —
  i. against the assessment benchmarks in a categorising instrument for the development; and
  ii. having regard to any matters prescribed by regulation for this subparagraph; and

(b) may be carried out against, or having regard to, any other relevant matter, other than a person's personal circumstances, financial or otherwise.

Section 30(1) of the Regulation states that assessment benchmarks generally include:

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For section 45(5)(a)(i) of the Act, the impact assessment must be carried out against the assessment benchmarks for the development stated in schedule 9 and 10.

Schedule 10, Part 2, Division 2, Table 1 of the Regulation prescribes the State Development Assessment Provisions ('SDAP') as the assessment benchmarks – which for this application is State Code 27: Battery Storage Facility Development.

Section 31(1) of the Regulation states that:

For section 45(5)(a)(ii) of the Act, the impact assessment must be carried out having regard to—

- ***(a) the matters stated in schedules 9 and 10 for the development; and***
- ***(b) if the prescribed assessment manager is the chief executive—***
  - ***i. the strategic outcomes for the local government area stated in the planning scheme; and***
  - ***ii. the purpose statement stated in the planning scheme for the zone and any overlay applying to the premises under the planning scheme; and***
  - ***iii. the strategic intent and desired regional outcomes stated in the regional plan for a region; and***
  - ***iv. the State Planning Policy, parts C and D; and***
  - *v. for premises designated by the Minister—the designation for the premises; and*
- *(c) if the prescribed assessment manager is a person other than the chief executive or the local government—the planning scheme; and*
- *(d) if the prescribed assessment manager is a person other than the chief executive—*
  - *i. the regional plan for a region; and*
  - *ii. the State Planning Policy, to the extent the State Planning Policy is not identified in the planning scheme as being appropriately integrated in the planning scheme; and*
  - *iii. for designated premises—the designation for the premises; and*
- ***(e) any temporary State planning policy applying to the premises; and***
- ***(f) any development approval for, and any lawful use of, the premises or adjacent premises; and***
- ***(g) the common material.***

These are discussed further in the following sections.

7.1.6.1 STATE DEVELOPMENT ASSESSMENT PROVISIONS – STATE CODE 27: BATTERY STORAGE FACILITY DEVELOPMENT

As noted above, Schedule 10 confirms that the relevant assessment benchmarks are set out in the State Development Assessment Provisions, being State Code 27: Battery Storage Facility Development. A response to the Code is provided at Attachment 14 and summarised below.

PO1 – AREAS OF HIGH ECOLOGICAL VALUE AND ASSOCIATED WILDLIFE HABITATS

Performance Outcome PO1 requires the development to be located, sited and designed to ensure that protected wildlife and associated habitats and areas of high ecological value are protected from adverse impacts. *Protected wildlife* and *high ecological value* are defined terms under the Code, which mean wildlife that is protected under the *Nature Conservation Act 1992* and Matters of State Environmental Significance as defined in Schedule 2 of the *Queensland Environmental Offsets Regulation 2014* respectively.

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The subject site contains mapped Wildlife Habitat (Special Least Concern and Endangered or Vulnerable), (i.e. protected wildlife); and the proposed development is located entirely outside these areas. The closest mapped feature – which is the Endangered or Vulnerable sub-category – is setback approximately 142m from the northern section of the proposed development and 233m from the southern side.

In terms of areas which meet the definition of *high ecological value*, the subject site is mapped as containing the following Matters of State Environmental Significance ('MSES'):

- Category B (Remnant Vegetation);
- Category C (High Value Regrowth);
- Category R (Reef Regrowth);
- Wildlife Habitat (Special Least Concern; Endangered or Vulnerable);
- Regulated Vegetation Intersecting a Watercourse (Stream Orders: 1, 2, and 3); and
- Queensland Waterways for Waterway Barrier Works (Risk of Impact: Low, Moderate, and High).

4 Elements Consulting were engaged to undertake an initial environmental assessment of the project and have undertaken two field inspections in February 2024 and again in February 2026. Following on-site investigations and desk top studies, their report concluded that the proposed project will not impact a Matter of State or National Environmental Significance. A copy of the report is contained within Attachment 4.

Simply put, the 4 Elements Report demonstrates that the project will not impact upon any Matters of State or National Environmental Significance because the development:

- Is located entirely within an area designated as Category X vegetation;
- Minimises the clearance of existing (non-remnant) vegetation by being in a part of the site that is considered to be highly disturbed and not suitable for supporting wildlife habitat given its lack of native woody vegetation;
- Is located outside any areas identified by the on-ground assessment as likely to or potentially containing koala habitat and/or threatened species; and
- Provides generous buffers to the *high ecological value* areas (of a minimum of 50m to lot boundaries and 100m to project components).

Access to the project area requires crossing a Stream Order 1 Watercourse/ Low Risk Waterway. The intended location of this crossing is within a part of the mapped waterway which can comply with the accepted development criteria of the Waterway Barrier Works Code and is generally in a location that is currently utilised for crossing. Where compliance is not achieved, separate Operational Works applications will be made for waterway barrier works as well as associated approvals under other Acts if necessary.

Due to the presence of Koala Habitat, the development was referred to the Department of Climate Change, Energy, the Environment and Water for actions that may impact on Matters of National Environmental Significance, based on the material contained in Attachment 4. The Minister determined that the project is 'Not a Controlled Action' on 26 March 2026. A copy of this letter is provided in Attachment 21.

PO1 is therefore satisfied.

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PO2–PO7 – RISK MITIGATION AND INCIDENT RESPONSE

An assessment of the project in relation to identification of hazardous risks (physical, chemical and battery failure) to the site and surrounding area, as well as how these risks can be mitigated and managed through appropriate design, siting, construction and operations management was undertaken by Arriscar and is included in Attachment 5.

Firstly, the development has been designed to avoid areas of vegetation (i.e. bushfire risk) and is appropriately separated so that under normal operating conditions, there is a low risk of incidents.

Secondly, the design, siting and technical standards of the components minimise the potential for explosion and contamination risk by having a fully contained system, with bunds for each container and bunds for the entire development site to ensure any potential contamination can be contained. Appropriate access to the site (constructed to a sufficient standard) as well as Operational Emergency Management Plan procedures ensures the development can be operated in a manner that will avoid and/or mitigate any impacts

In summary, the report confirms:

- The current technology ensures that the potential for over-heating is limited through constant monitoring and early detection, diagnosis and troubleshooting of any errors in BSF performance. Specifically, each BSF container includes:
    - Monitoring systems that monitor temperature, voltage, system trip in event of electrical shorts or overheating and fire alarm control panels and local control stations.
    - Cooling systems to maintain safe operating temperatures and prevention of overheating.
    - Fire detection systems including alarms as well as aerosol fire suppression units installed in each container.
    - Water mist systems can be remotely activated.
    - Adequate spacing between battery racks and containers to prevent escalation.
    - Regular and ongoing maintenance for the life of the project.
    - Combustible gas detectors and exhaust fans ensure rapid removal of toxic gases generated during battery overheating or failure, with dispersion limited to within 11m of the containers and therefore contained on site.
- There is minimal risk of fire or explosion due to the battery technology that is being used, noting that LFP's are less prone to fires and thermal runaway when compared to Li-ion batteries through:
    - in-built fire detection and aerosol extinguishment within each battery container.
    - high insulation electrical design.
    - explosion proof mechanical design.
    - higher level of monitoring through sensors and timely alerts.
- Modelling shows that the thermal radiation and overpressure effects, explosion and toxic gas effects of BSF fires would be confined within the site and no injurious offsite effects.
- The separation distance between containers should enable approach by firefighting personnel (i.e. no less than 10m).
- Any gas concentrations that may produce injury or irritation would be confined entirely within the site boundary.

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- While the proposal does not meet the requirements for classification as a Major Hazard Facility, State Code 21 has been used to 'inform' the assessment, and the proposal complies with the Performance Outcomes specified in State Code 21.

Recommendations provided within the report (that will be incorporated in the design of the Battery Storage Facility and relevant operation management plans) include:

- The use of firewalls for transformers in separate bunds, if a separation distance of 10m from each cannot be achieved.
- Calibration and half-yearly testing of the combustible gas detector and exhaust fan start on gas detection.
- Installation of an alarm that indicates failure of exhaust fan in BSF containers, when operational.
- Development of an Emergency Response Plan that addresses the specific hazards identified in the Hazard Analysis and ensures emergency response personnel take appropriate precautions to protect themselves.
- Designing the transformer bund to contain 110% of the oil volume in the transformer tank and firewater applied as per NFPA 855-2020.
- Development of a schedule for function testing of electrical protection and fire protection safeguards.

A detailed Operational Emergency Management Plan (OEMP), Construction Environmental Management Plan (CEMP) and final project-specific Fire Safety Study (FSS), incorporating detailed design outcomes and consultation with Queensland Fire Department and/or local emergency services, will be prepared prior to commencement of construction.

These plans will provide well-defined incident response strategies and procedures that will ensure rapid detection, clear communication and coordinated action with Queensland Fire Department and/or local emergency services.

Accordingly, Performance Outcomes PO2 – PO7 are met.

PO8 – SOCIAL IMPACTS

A Social Impact Assessment has been prepared by ERM in accordance with section 106W of the *Planning Act 2016* and is included at Attachment 9.

The assessment identified the following social impacts resulting from the proposal:

- Reduced community cohesion.
- Reduced trust and confidence in community engagement.
- Creation of direct employment opportunities.
- Increased economic benefits.
- Potential impact on social infrastructure and services.
- Perceived land use incompatibility.
- Potential impact on social amenity.
- Potential impact on community health and safety.
- Potential impact on cultural heritage.

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The significance of the above social impacts was then considered based on specific factors (detailed in the report) and given an impact rating. The impact ratings were then re-assessed after applying mitigating and/or enhancement strategies to produce a Residual Impact Significance rating for each impact, both at the construction phase and operation phase of the development. Taking into account both phases for each impact and therefore 18 ratings in total (nine impacts x two phases), as a whole the ratings were: 22% Positive, 22% Negligible, 33% Minor, and 22% Moderate. The assessment did not determine any social impact with a Residual Impact Significance rating of Major.

The report further details a Preliminary Social Impact Management Plan which will be implemented through a range of protocols and plans which include both monitoring and performance indicators including:

- Community Stakeholder Engagement Plan and Complaints Management System which will establish ongoing engagement activities, and a system to record and report on complaints received.
- Worker Code of Conduct and Project Inductions which will ensure contractors are aware of expectations during construction.
- Local Employment Plan and First Nations Employment Targets including Workforce Upskilling and Training Opportunities which will report on construction contractor targets and opportunities for involvement in the construction of the project.
- These are supported by a commitment on the part of the project proponent to engage and coordinate with accommodation providers and other proponents to minimize impacts in relation to workforce accommodation during construction.
- Construction and Operational Environmental Management Plans to record and report impacts in relation to technical aspects affecting amenity (noise, air, dust and so forth).

As a result of the Social Impact Assessment, a Community Benefit Agreement ('CBA') was negotiated and finalized with Council and sets out how the project will contribute towards the Gladstone Regional Council's Renewable Energy Community Benefits Policy and separately deliver community benefits to the Project's host communities.

In relation to funding commitments, the CBA requires the project proponent to:

a. make a monetary contribution to Council's Community Benefit Fund;
b. provide initial 'one-off' funding to a cross section of local community groups;
c. commit funding in support of a local community benefit sharing program; and
d. commit funding in support of a neighbourhood benefit program.

The CBA also confirms the developer's intention to enter into a separate Shared Benefits Agreement with First Nations Peoples.

The funding commitments exclusive of payments to First Nations Peoples (summarised in the Table 4 below) total more than $215 per MWh pa over the 20+ year life of the project, representing total funding of more than $6.8 million (assuming the target nameplate capacity is achieved).

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Table 4: Community Benefit Agreement Funding Commitments

Sub-program	Funding Commitment	Estimated annual payment assuming nameplate capacity of 1600 MWh (excluding CPI increases)
Initial 'one off' funding to local community groups	$40,000	
Monetary Contribution to Council controlled Community Benefit Fund	$150/ MWh pa	$240,000
Council Fund Administration Fee	5% of Monetary Contribution	$12,000
Commitment to local community benefit program	$50/ MWh pa	$80,000
Commitment to neighbourhood benefit program	$15/ MWh pa	$24,000
TOTAL	$215/MWh pa plus $40,000	$356,000

A copy of the fully executed Community Benefit Agreement which confirms the above commitments, is provided as Attachment 17.

The proposed framework for ongoing community engagement prior to and after development assessment submission, and during construction and operation of the BSF, was co-designed with Gladstone Regional Council and embedded in the Community Benefits Agreement. The framework provides for the establishment and implementation of a Neighbour Reference Group and Community Engagement Forum . These forums and supporting engagement strategy will be used for overall project communication, obtaining community feedback, and addressing specific concerns and complaints.

The Proponent has updated its Community and Stakeholder Engagement Plan since signing the Community Benefit Agreement in March 2026 to reflect the engagement structures in the CBA and to incorporate more granular plans for community and stakeholder engagement. A copy of the updated CSEP is included as Attachment 24.

Broadly, community consultation for the project that has occurred since May 2025, includes:

- Provision of project updates to the Host Landowner and immediate neighbours.
- Regular meetings with the Gladstone Regional Council to provide Project updates and discuss technical matters.
- Ongoing engagement with First Nations Peoples, including project briefing to the directors of FNBGGGTB on 18 September 2025.
- A Community Town Hall Briefing on 27 November 2025, that was attended by 26 stakeholders at the Bororen Community Hall.
- One-on-one meetings with Immediate Neighbours on 3 and 4 December 2025.
- In-person meetings with over 17 community members in Bororen and Miriam Vale in December 2025.
- In person meetings with Gladstone Regional Council and Mayor;

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- Briefing to State and Federal Members of Parliament;
- Ongoing updates through emails, fact sheets and provision of technical information to local community groups, neighbours and Council. The full suite of fact sheets can be downloaded from the project website under 'Fact Sheets' AMPYR/ Rutherglen Battery.

As such the proposal meets PO 8.

PO9–PO12 – AGRICULTURAL LAND

Gilbert and Sutherland have undertaken a staged Agricultural Assessment for the project which confirms that the site does not contain any high-quality agricultural land as defined. The report confirms that:

- The footprint of the development will impact a maximum of 3.6ha of Class C2 ALC land which is not a quantifiable material loss of produceable agricultural land within the site or locale. Accordingly, there is no unacceptable loss of high-quality agricultural land in accordance with PO9.
- There is no fragmentation of high-quality agricultural land and the balance of the land can continue to be used for cattle grazing in compliance with PO10.
- The development will be constructed in a way that will not reduce the soil attributes of the land in accordance with PO11.
- The site does not contain, nor adjoin a stock route in accordance with PO12.

As such, the proposal meets PO9-PO12.

PO13–PO15 – NATURAL HAZARDS

Natural hazards refers to flood, bushfire, erosion, storm tide inundation, landslide, earthquake and wind actions. It is noted that the development footprint is not subject to landslide or affected by storm tide inundation. Further, the potential for cyclone events and earthquakes is also considered low.

Flood

WMS undertook a flood and stormwater assessment of the site, to firstly determine the appropriate developable area to avoid 0.5% AEP storm event and to then inform the ongoing management of stormwater. A copy of their assessment is provided for reference in Attachment 6 and confirms that:

- Overland flows from the Rain on Grid model indicate that flow depths traversing the site are collected and conveyed via the natural channels, with modelled flow depths in the channels typically in the range of 0.5m to 1.5m. Sheet (non-channelised) flow is less than 500mm of the 1% AEP and 0.5% AEP events.
- The HV Substation key electrical components are immune to stormwater and riverine flooding up to and including the 0.1% AEP storm event (and therefore out of the 0.2% and 0.5% AEP per Table 8.7.2.3.2 of the planning scheme).

The proposal plans show a minimum 100m setback from all project components to the closest waterways on site. All overland flows are essentially contained on site within a series of bunds to minimise risk of contamination where an incident occurs. This ensures that no contamination is likely beyond the extent of the bunds within the development footprint.

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Erosion

Butler Partners undertook a field investigation with respect to geotechnical attributes of the land, a copy of their report is within Attachment 22. In summary:

- There were two areas showing significant erosion on the site, which is located outside the development footprint.
- One area of minor erosion along Red Hill Road tracks in south-western section of the site (within Killarney Creek).
- Surface Soils are primarily pale brown sandy clay soils, with higher gravel content on internal, informal access tracks.
- Alluvial sandy soils observed along waterway banks, with changes unable to be considered due to extensive grass coverage. No observable signs of erosion or instability along creek banks, although some exposed roots in some locations.
- Two soil samples indicate a moderate to high potential for dispersion (Emerson Class No. 2) which can be managed through treatment, erosion and sediment control measures and compaction during earthworks/disturbance.
- Access tracks will need to be upgraded to accommodate suitable subgrades (not less than 150mm).
- Options are provided for various foundation methods for the site which can be investigated during detailed engineering design prior to construction.

Overall, the development is located outside areas subject to high erosion risk, and there are appropriate methods proposed to ensure the development can be constructed and operated to minimise risk for erosion.

In addition, as the development includes disturbance areas of more than 2,500m^2 and the construction timeframe will exceed 6 months, erosion factors will be managed through the requirements of the Stormwater Management Plan included as Attachment 6, which includes a recommendation for the preparation of a certified Erosion and Sediment Control Plan that meets the Best Practice Erosion and Sediment Control Guideline published by the IECA, 2008. A site – specific Environmental Management Plan will also be prepared to outline measures and controls to minimise potential impacts from chemical spills/leaks and discharge of treated and untreated wastewater. Such measures include:

- Locating chemicals more than 100m from watercourses (which is achieved through site layout, that is setback a minimum of 100m from any watercourse on site).
- Use of glyphosate – based products or similar to manage weeds to minimise potential risk of harmful herbicide by-products entering surface water.
- In stream crossings to comply with Accepted Development Code for waterway barrier works.
- Installation and operation of any septic tanks to be designed in accordance with Australian Standards.
- All drainage control works will be designed to meet 1 in 10 year ARI events.
- Minimise exposure of disturbed soils and diversion of water run off from undisturbed areas around disturbed areas;
- Determination of appropriate erosion and sediment control measures to correspond with identified erosion risk rating and potential soil loss rate, average monthly rainfall and the like.
- Construction of a berm around the full perimeter to capture stormwater run off.

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Accordingly, the development has been designed to accommodate appropriate earthworks and detention basins, and together with suitable erosion and sediment control, the risk for erosion can be minimised.

Bushfire

Eldon Bottcher undertook a Bushfire Mitigation assessment, and a copy of that report is provided in Attachment 11. While the proposal is located on land subject to bushfire hazard, we note:

- The development is located outside of high and medium bushfire hazard areas of the SPP mapping.
- Extensive land clearing around the development site (including within the adjacent Powerlink easement) provides a minimum 100 metre buffer that will protect the BSF from the risks posed by bushfire and other natural hazards that could affect the site. The development components are located further than 400m from the hazardous vegetation on site.
- The development is not for a sensitive land use as it does not increase the number of people or property on the site.
- A private access road from Red Hill Road, being 8m wide constructed access with turnaround facility, together with 2 x 180,000L water tanks are sufficient for both emergency access and bushfire and firefighting on site.

In addition, Arriscar undertook a Fire Safety Study and Risk Assessment, incorporating the outcomes of the Eldon Bottcher report, which is included as Attachment 5 that addresses fire risks associated with battery developments. As noted above, the report confirms:

- Lithium-Iron Phosphate or Lithium ferrous phosphate ('LFP') battery chemistry is an advanced subtype of Lithium Ion battery, which is less prone to fires and thermal runaway when compared to Li-ion batteries through: in-built fire detection and (aerosol) extinguishment within each battery container, high insulation electrical design, explosion proof mechanical design, and higher level of monitoring through sensors and timely alerts.
- Access to the development will be via an 8m wide access track from Red Hill Road and accommodate sufficient manoeuvring for emergency vehicles.
- The proposed development has been designed to accommodate a minimum of 45m asset protection zone, which consists of gravel and hardstand areas, and includes the 2.7m high earth mound, which will be grassed, reducing the risk of a fire on the site starting a bushfire on adjoining land or a bushfire on adjoining land affecting the BSF.
- The development is setback 1.2km from the nearest adjoining property boundary.

Overall, the risk of bushfire emanating from or impacting upon the property is minimised through layout, choice of technology and management of the development.

Accordingly, the proposal complies with PO13-PO15.

PO16–PO19 – PROTECTING WATER QUALITY AND STORMWATER MANAGEMENT

The proposed development has been designed to be located outside of any mapped watercourse and is sufficiently setback from all mapped watercourses by a minimum of 100m as shown in the Proposal Plans within Attachment 1.

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WMS undertook a flood and stormwater assessment of the site, to firstly determine the appropriate developable area to avoid 0.5% AEP storm event and to then inform the ongoing management of stormwater. A copy of their assessment is provided for reference in Attachment 6 and confirms that:

- Flows from the watercourses traversing the BSF parcel do not encroach any of the battery stations for the 0.5% AEP storm event (defined flood event).
- Overland flows from the Rain on Grid model indicate that flow depths traversing the site are collected and conveyed via the natural channels, with modelled flow depths in the channels typically in the range of 0.5m to 1.5m. Sheet (non-channelised) flow is less than 500mm of the 1% AEP and 0.5% AEP events.
- Key electrical components of the Substations are immune to stormwater and riverine flooding up to and including the 0.1% AEP storm event (and therefore out of the 0.2% and 0.5% AEP per Table 8.7.2.3.2 of the planning scheme). Modelled wet cells within the defined extent containing the substation are from the local catchment, not external flows.
- There is a single waterway crossing of a Stream Order 1 crossing; and appropriate design of this crossing will be undertaken to meet or exceed the requirements of the Accepted Development Waterway Barrier Works crossing Code either through culvert or bed level crossing to ensure safe egress and minimal impact on the waterway.
- The development also includes a constructed berm, which also acts as a bund that ensures appropriate water containment on site.

In terms of water quality, as the layout is essentially an enclosed system, with stormwater primarily dispersed amongst grassed areas, or gravel such that the natural flow and stormwater quality will be affected in a minor way by:

- Containment through bunding of each of the battery and inverter groups, controlled via automated bund valves as well as detention basins as a second layer of containment for any accidental or incident related releases.
- During normal operating conditions, clean rainfall is discharged to detention basins and controlled discharge can occur.
- During isolated incidents, all water can be contained on site through bunds and then removed.

No piped stormwater drainage network is proposed. The management of stormwater will retain the natural flows from bunded areas (clean water) to a series of detention basins and ultimately discharged or released as required. The proposed detention basins and containment measures form part of an incident response rather than stormwater system. The development does not alter existing catchment drainage behaviour and does not affect run off from existing development.

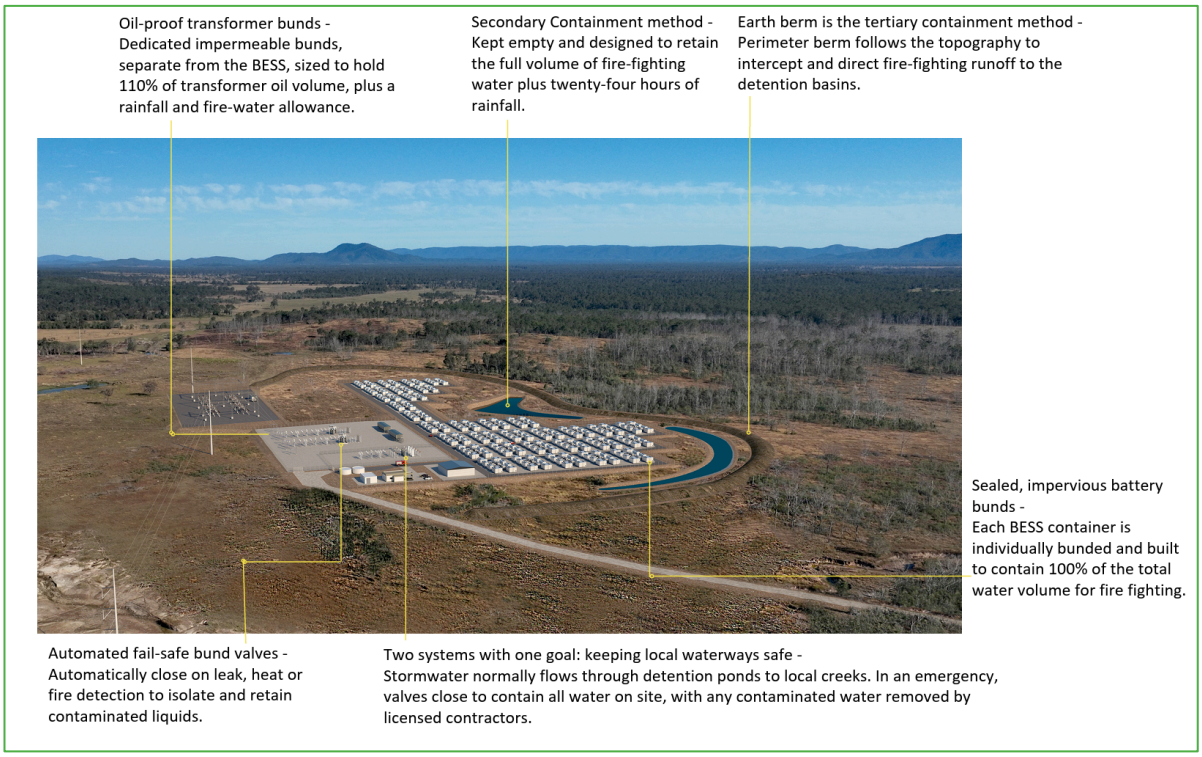
Stormwater will be managed across the site in accordance with the Site Based Stormwater Management Plan included as Attachment 6, which will be updated once detailed engineering designs are finalised and reflect any relevant conditions of approval.

The indicative water management system as described above is shown below in Figure 15.

Accordingly, the development complies with PO16 – PO19.

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Figure 15: Indicative Water Containment Management System (source: AMPYR/Gryphon Energy Fact Sheets)



PO20–PO21 – ACOUSTIC AMENITY AND VIBRATION

Matrix Acoustics undertook a Noise Impact Assessment for the project, including noise monitoring to determine the ambient noise environment and assessed the potential impact on 15 sensitive receptors located within 1.3km and 5.8km from the project site.

A copy of the report is provided in Attachment 10. It should be noted that:

- The background noise monitoring confirmed significant insect noise at both logger locations, which is a feature of the area.
- A 3D noise model was constructed of the area and used to predict noise levels for construction and operation of the development. The model used 'worst case' assumptions including construction hours (i.e. 7am – 6pm) and operational noise modelling (i.e. 100% of battery units running and inverters at 80% capacity) against the most stringent criterion for daytime hours.
- Noise modelling indicates that with the installation of the earth berm, the proposed development will comply with the noise criteria for Rural environments contained in the Environmental Protection (Noise) Policy 2019. It is noted that acoustic attenuation was required only to ensure compliance at the existing homestead on the project site. All external receptors are compliant without attenuation.
- Ongoing noise monitoring will be required during construction and operation of the project.
- No vibration equipment is anticipated to be used for the project in construction or operation.

Accordingly, the project complies with PO20 and PO21 by meeting the requirements of *Environmental Protection (Noise) Policy 2019.*

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PO22–PO23 – VISUAL IMPACT AND LIGHTING

Charlton + Hayman Architects undertook a detailed Visual Assessment of the project, and a copy of the report is provided in Attachment 19. The visual catchment of the area includes 15 sensitive receptors as identified in the noise report, public viewing points along Red Hill Road and potential outlooks from walking tracks and camping areas within Eurimbula National Park to the East of the development site.

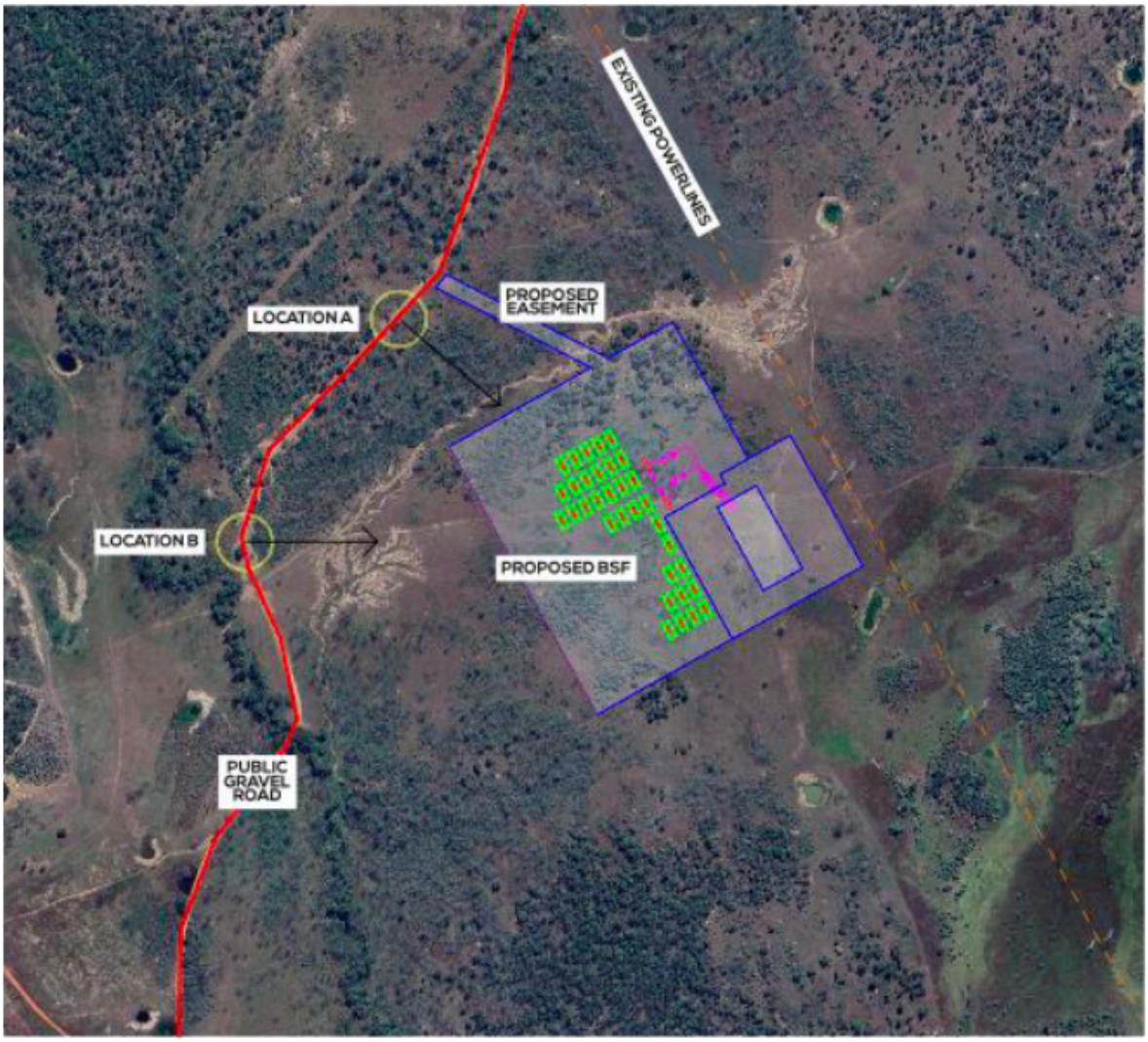
The existing intervening topography and vegetation will largely screen views of the subject site from key aspects/view corridors and adjoining receptors. There are 15 sensitive receptors within 3.5km of the project, with the closest (2.4km) being the host receptor (which may be demolished or re-purposed). There are three other receptors (R2, R8 and R10) which may have views towards the development due to their elevation relative to the development. It is noted that R8 is located on the property to the north ('Eurimbula') for which a large scale solar and battery development is proposed and is currently unoccupied, as it is intended to be office/control building for that development. Notwithstanding, existing vegetation on the eastern side of the BSF and parts of the berm are likely to partially obscure the view from this receptor. R2 (which is the closest receptor at 2.3km west of the development) provides workers accommodation for the "Greenslopes" cattle property. Heavily vegetated areas along Killarney Creek and pockets of vegetation between Greenslopes and the BSF are likely to substantially, if not fully, screen the view of the BSF from the Greenslopes receptor, considering that this property is not visible from the development site.

The "Bethome" homestead (R10) is located on a hilltop approximately 5km south -east of the development area. Occupants would presently see the transmission lines that run through the project site due to Bethome's elevated position and the fact Bethome looks down the electricity corridor, which is clear of vegetation. Because of the land contours, it is unlikely Bethome would see the Rutherglen BSF when constructed, but they would probably see the tops of the 3 switchyard towers constructed on the IUSA Lot (as shown in Figures 16 &17). As the switchyard towers will read as part of the transmission line infrastructure and given their distance from Bethome, visibility of the top of the towers is unlikely to materially change the existing visual impact of the transmission lines on R10.

Due to the distance of the project from key public areas (i.e. 500m from Red Hill Road), the development being located adjacent existing High Voltage transmission lines, and the relatively low height of the battery components (being 3.5m maximum), and established vegetation, the project is not anticipated to significantly alter the landscape or visual amenity within the region. The construction of the proposed 2.7m high berm around the perimeter of the battery development, will largely obscure the development from view from Red Hill Road, as demonstrated in Figures 16 - 18 below.

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Figure 16: Location of sensitive receptors within the vicinity of the site



SATELLITE IMAGE OF THE PROPOSED SITE SHOWING PHOTOGRAPHIC LOCATIONS:

SCALE:

0M 100M 200M 300M 400M 500M 600M 700M 800M 900M 1000M

N

LEGEND:

LOCATION OF PHOTOGRAPH

PUBLIC GRAVEL ROAD

EXISTING POWER LINES

FENCE AROUND PROPOSED BSF

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Figure 17: view of the developed site, from Red Hill Road (Location A).



Figure 18: View towards the project from Red Hill Road (Location B)



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In relation to visual impacts from lighting, all external lighting will be low intensity lighting (except where required for safety and emergency purposes) and will shine downwards in accordance with AS/NZS 4282:2023. Accordingly, the proposal complies with PO22 and PO23.

PO24–PO28 – TRANSPORT NETWORKS

PTT undertook a detailed Traffic Impact Assessment and Conceptual OSOM of the project in accordance with PO24-PO28 of the Code. The purpose of the assessment was to evaluate the required access arrangements, traffic generation and impact on the surrounding road network. A copy of their reports is provided for reference in Attachment 7.

The key points of the assessment confirm:

- The construction phase will be over a 9-12 month period.
- Vehicular access to the site will be facilitated from Red Hill Road.
- Heavy vehicles will travel to the site from the Port of Gladstone, via the Bruce Highway.
- Predicted traffic generation during the construction phase is around 50vpd and 20vph during peak periods.
- Once operational, the traffic generation is significantly less and relatively infrequent.
- The traffic generated by the construction and operational phases of the project is not expected to have a significant adverse impact on the surrounding road network operations.
- There will be six (6) OSOM vehicle trips associated with the delivery of transformers (for the Substation) and battery modules. It is expected that all OSOM vehicle movements would originate from the Port of Gladstone and therefore, travel to/from the north of the site.
- There are several 'pinch points' identified for the OSOM route as follows:
    - Bruce Highway/Red Hill Road intersection, requiring temporary traffic management and minor temporary widening.
    - Red Hill Road Level Crossing (Chainage 0.05km) – no specific mitigation, coordination required with Queensland Rail during construction.
    - Red Hill Road Culvert Crossing (Chainage 0.5km, 1.4km) – confirmation of load carrying capacity required.
    - Red Hill Road Sealed Section (0km to 3km) – widening required including vegetation clearing.
    - Red Hill Road unsealed section (3km-10.1km) – localised widening including potential vegetation removal.
    - Red Hill Road 90-degree bend (Chainage 5.9km) at Smallcombs Road – road widening and vegetation clearing for sight distances.
    - Red Hill Road Cattle Grid and Creek Crossing (Chainage 8.2km) – at the southern boundary of the subject site – the cattle grid is to be removed and creek crossing upgraded (culvert structure).
    - Red Hill Road Floodway (Chainage 9.1km) – upgraded culvert structure.
    - Red Hill Road Cattle Grid (Chainage 9.4km) – to be removed and pavement reinstated.

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The assessment recommends that:

1. To accommodate construction site access, Red Hill Road should be widened to 9m, with a 9m wide access driveway and corner radii of approximately 15m.
2. The entire extent of Red Hill Road is to be widened to a maximum of 7m (with additional widening on bends) or the existing 5m-6m wide roadway be retained, but passing bays be provided at regular intervals and/or traffic management and control measures be implemented.
3. Vegetation within the Road Reserve to the north of the site be removed to improve sight distances.
4. Sufficient parking areas to be provided on-site to ensure no parking occurs on the surrounding road network.
5. On-site parking area is to be constructed in accordance with AS2890.1 for the operational phase of the development.
6. As part of the OSOM permit process, an assessment of OSOM vehicle access be undertaken prior to the delivery of relevant components to the site and will use pilot or escort vehicles in addition to the OSOM permits once the assessment of the load characteristics and dimensional requirements are confirmed for the components.
7. Appropriate road upgrades are to be provided for as noted above and can be accommodated through additional permit process with Gladstone Regional Council and/or Department of Transport and Main Roads accordingly.

In terms of the types of vehicles used during construction, battery modules and other components will be delivered on 40ft trailers from the Port of Gladstone and staged over the project construction so that they are delivered on a 'Just In Time' basis to minimise the need for storage of equipment on-site. During construction, most materials will be delivered in containers, so while there will be a mix of vehicle types, the largest proportion of vehicles will be single trailers.

Internally, the main access 'roads' will be constructed at the commencement of construction works with full details being provided in the Construction Management Plan. All necessary access between module areas will generally be via existing access tracks where possible and where necessary, existing culvert and bed level crossings will be utilised and upgraded or constructed once final engineering design is completed.

Externally, there will be a single main access point to the site proposed from Red Hill Road, to ensure larger construction vehicles can enter and exit the site safely. Up to 20 parking spaces can be provided on-site at the control room/laydown area to cater for the permanent staff in addition to the temporary contractors on-site.

It is anticipated that a Pavement Impact Assessment will likely be required to be provided as part of the Construction Management Plan and as a result of any conditions of approval. Such assessments will ensure that the approved transport route to the project will be left in the same condition as the pre-construction of the project, with agreed standards to be met for both sealed and unsealed sections. It is also anticipated that a maintenance bond or guarantee will be provided by the applicant to ensure works are carried out, in addition to a contribution for the accelerated degradation of the sealed section of the approved transport route as confirmed through the dilapidation surveys.

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In addition, a Traffic Management Plan will be prepared as part of the detailed engineering stage of the project and will ensure provision of traffic control devices generally in accordance with the Manual of Uniform Traffic Control Devices issued by Queensland Transport, as well as other measures to ensure the safety and efficiency of the road network.

Accordingly, the proposal complies with PO24-PO28.

PO29–PO30 – INFRASTRUCTURE

Searches undertaken from publicly available information (Qld Globe data sets and Resource Authority – Public Reports, contained in Attachment 16), confirms that the land is not subject to any current Exploration or Mining Permits or leases, including Petroleum Pipelines. There is a single Mineral Exploration Permit that was granted in September 2025 (EPM29097) which is 2km from the western edge of the overall project site, and 4km west from that part of the site proposed to be developed. The Exploration Permit was granted to Dart Exploration until 31 August 2030.

In relation to relevant infrastructure required for the project:

- On-going water requirements will be provided via the on-site water resources and if required supplemented by the provision of rain water tanks and pump/filter to provide water for drinking and servicing use. Where insufficient rainwater is received, rainwater tanks will be refilled via water tanker. All potable water will be provided in accordance with Australian Drinking Water Guidelines. It is expected that temporary maintenance staff will be responsible for individual supply of water when visiting the site.
- 2 x 180,000L capacity tank/s will be provided on the project site for fire fighting purposes, which will be filled from external water sources and fitted with appropriate fire fighting connection fittings and generator. In addition, two basins will be constructed within Lot 1 to accommodate and capture any run-off on the site and then discharge as clean water as required. The design and function of the fire suppression system will be developed in consultation with State and regional emergency service providers.
- An on-site sewerage collection and treatment facility will be provided to cater for the minimal permanent staff via domestic sewerage treatment systems. Construction staff will be provided with temporary facilities as part of the Construction Management Plan for the project. It is proposed that a conventional domestic sewage treatment infrastructure (secondary treatment or greater) for the project will be provided. The location of the system will be determined during the final design phase of the project. Alternative options including septic tanks (primary treatment), composting systems and holding tank with removal by tanker will be explored.
- As outlined above, there is a single Easement (Easement A on CPFD923 and Easement B on FD922) that traverses the property and contains a 275kV (South Pine (Warner T) to Gladstone 2 (Maurice Hill T)) HV transmission line. A 33kV Ergon line also traverses the site, although it is not contained within an easement. The BSF will ultimately connect to the existing 275kV Gin Gin to Calliope River - (South Pine (Warner T) to Gladstone 2 (Maurice Hill T)) HV transmission line through the DCA Substation (which will convert the electricity from 33kV to 275kV) which will be connected to the HV Substation (the 'cut in') which does not form part of this application. Both Powerlink and Ergon have provided

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responses as part of the previous application, a copy of which is provided as Attachment 15. In addition, a Preliminary Connection Enquiry has been made with Powerlink which confirms both capacity of the line and suitability of the project for connection.

Accordingly, the proposal complies with PO29-PO30

PO31–PO35 – DECOMMISSIONING

A Decommissioning Security Report is provided as Attachment 23.

It is intended that after a period of 20 years, a decision will be made to replace or repower parts of the BSF to either extend the life of the development or decommission the project. The Proponent has an Option to purchase the land from the current landowner. The Proponent intends to exercise the Option and become the freehold landowner of the development site before commencement of construction.

It is understood that any conditions of approval will require both an End of Construction and End of Operations Decommissioning Plan/s which reflects any Rehabilitation Management Plans and Site Stabilisation Plans. Noting that the part of the site to be developed does not contain any significant ecological features, and is not high-quality agricultural land, the expectation would be to reinstate the land as pasture when the project is decommissioned.

If the BSF is decommissioned after 20 years (or some later date), it is intended that the decommissioning process will follow the 'reverse' of the construction process, that is:

8. All of the 'above ground' infrastructure (buildings, containers, physical structures) would be removed;
9. Any below ground infrastructure (cabling etc) would be removed;
10. Any hardstand (including concrete) would be removed and returned to pre-development state (grass/pasture); and
11. The earth berm would be retained insitu and/or spread across the development site to be used for rehabilitation/pasture growth.

With respect to the End of Operations Management Plan, the proponent is committed to following the waste hierarchy as outlined in the *Waste Reduction and Recycling Act 2011* (i.e. avoiding, reducing, reusing and recycling), with an aim to support and partner with companies who promote a 'circular economy' approach to major components.

Opportunities for recycling BSF componentry are limited at this time, while there are established industries with respect to other components (concrete/copper etc). There are many end-of-life challenges related to the physical disassembling of componentry and costs (and risks) associated with transportation of disassembled components. Also, recovery of critical chemical components (such as Lithium iron Phosphate) is still in its infancy, as there is currently little or no value in the chemical components on their own.

However, with the evolving nature of renewables technology and the timeframes (20+ years) before a decision will need to be made with respect to decommissioning, it is expected that more advanced recycling processes will exist at cessation of operation of the BSF that will allow for the reuse, recycle and/or

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repurpose of materials. It is the proponent's intention to pursue these opportunities in accordance with best industry practice at the time.

The quantification of security is outlined in the Decommissioning Plan and essentially, is $7m in 2026 costs. It is proposed to use a sinking fund structure as security for the decommissioning costs. The sinking fund will begin accumulation at year 10 of operation, allowing the BSF to first generate stable merchant or tolling revenue and then have the financial burden of decommissioning spread over the remaining operational life of the BSF. As the Proponent will own (not lease) the land containing the BSF, it is unnecessary to protect the interests of a third-party landowner and the phased contribution structure will ensure the project remains 'bankable'.

A licensed corporate trustee (like Equity Trustees or Australian Unity Trustees) will be appointed to manage the sinking fund. The trustee will hold the funds under a strictly drafted Decommissioning Trust Deed.

The security structure will provide the following protections:

1. **Ring Fencing:** The capital contributed to the sinking fund is legally separated from the BSF's operating entities. If the developer or operator becomes insolvent during the 20+ year lifespan of the BSF, the decommissioning funds remain protected in trust for their sole intended purpose.
2. **Fiduciary Administration:** The trustee ensures that the funds are only invested in permitted, low risk defensive asset classes (eg high-grade cash equivalents or government bonds) to preserve capital
3. **Strict Draw Down Rules:** The developer/operator cannot tap into the sinking fund for operational fixes or capacity upgrades (repowering/augmentation). The trustee will only release the funds at verified milestones to cover specific decommissioning activities and costs (eg removal of equipment, battery recycling, removal of in-ground structures, site revegetation etc)
4. **Access to funds:** If the developer/operator fails to decommission the BSF in accordance with relevant development approval conditions, any third party landowner or a government agency may access the funds to carry out the relevant decommissioning works by following the processes set out in the Decommissioning Trust Deed.
5. **Periodic Reassessments:** The Decommissioning Trust Deed will allow for independent reassessment of decommissioning costs every 5 years, having regard to estimated salvage values. If the fund's balance falls short of updated liability projections, contribution rates will be increased, or a top-up security (such as a bank guarantee or surety bond) will be provided.

As an alternative to building a sinking fund via a trustee and depending on the availability and cost of financial security instruments, the Proponent may instead provide a bank guarantee or letter of credit as security for decommissioning costs. The bank guarantee would be from a trading bank that is an approved security provider under the Queensland Financial and Performance Management Standard, 2009 and would contain an unconditional, irrevocable promise to pay the secured amount on demand. The landowner (if different from the Proponent) or a government authority would be able to call on the bank guarantee to pay the decommissioning costs if the proponent/operator defaults on its decommissioning obligations.

Accordingly, the proposal complies with PO31-PO35

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7.1.6.2 REFERRAL TRIGGERS

Pursuant to Schedule 10, Part 9, Division 2, Table 1 and 2, the application requires referral to Powerlink due to Easement A on CPFD923 and Easement B on FD922 that traverses the property and contains high voltage electricity lines (Gin Gin to Calliope River). A 33kV Ergon line also traverses the site, although it is not contained within an easement.

Previous responses from both Powerlink and Ergon as part of the previous application are contained in Attachment 15.

The Minister has also determined under Section 48(7) of the Planning Act that Gladstone Regional Council should be a referral agency for the application, with its powers limited to providing advice only.

7.1.6.3 REGIONAL PLAN

The subject site is located within the *Central Queensland Regional Plan 2013*, however there are no specific designations applying to the site.

7.1.6.4 STATE PLANNING POLICY

The proposal is required to be assessed against Part C and Part D of the *State Planning Policy 2017*.

The project site is currently mapped as containing the following State Interests in relation to the *State Planning Policy 2017*:

- Biodiversity
  - Matters of State Environmental Significance
    - Protected areas (estate);
    - Wildlife habitat (endangered or vulnerable, special least concern animal);
    - Regulated vegetation (Category B, C, R, essential habitat and intersecting a watercourse);
- Natural Hazards, Risk and Resilience
  - Flood hazard area – Level 1 – Queensland floodplain assessment overlay;
  - Flood hazard area (Local Government flood mapping);
- Energy and Water Supply
  - Major electricity infrastructure (Powerlink).

Part C provides that the Purpose of the State Planning Policy is to secure a liveable, sustainable and prosperous Queensland. The State Planning Policy requires that State Interests are integrated in local planning instruments, regional plans and development decisions in order to:

- Strengthen our economy;
- Promote strong communities;
- Protect our environment;
- Wisely manage our resources; and
- Inform and respond to investment in infrastructure.

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An assessment against the Guiding Principles of Part C is provided in Table 4 below, demonstrating that there is no significant conflict or likelihood of non-compliance.

Table 4: Part C Guiding Principles of the State Planning Policy

GUIDING PRINCIPLE	COMPLIANCE STATEMENTS
Clearly focus on the delivery of outcomes	The proposal has been informed and specifically designed to integrate and balance economic, environmental, and social needs of current and future generations in order to achieve ecological sustainability. The proposal supports stated objectives, needs and aspirations of the community at the state, regional and local level.
Reinforce the role of local planning schemes as the integrated, comprehensive statement of land use policy and development intentions for a local area	The proposal coordinates and integrates land use policy for the local area by considering national, state, regional and local matters, to the extent relevant.
Support the efficient determination of appropriate development	The proposal intends to result in development outcomes that are certain, responsive and performance based.
Enable positive responses to change, challenges and opportunities	The proposal utilises contemporary information, responds to challenges, and incorporates community needs and aspirations.
Promote confidence in the planning system through plans and decisions that are transparent and accountable	The proposal intends to provide outcomes that reflect balanced community views and aspirations.

An assessment against the State Interest Statements of Part D is provided in Table 5 below, demonstrating that there is no significant conflict or likelihood of non-compliance.

Table 5: Part D State Interest Statements of the State Planning Policy

STATE INTEREST	STATEMENT	COMPLIANCE COMMENT

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Housing supply and diversity	Diverse, accessible and well-serviced housing, and land for housing, is provided and supports affordable housing outcomes.	This is not considered directly relevant to the proposal, given the State Interest Statement focus on housing. Batteries can improve the efficiency of the energy system and keep prices low by better integrating variable renewable infrastructure. This will help alleviate cost of living pressures and increase disposable income available for home ownership or rental accommodation. As the batteries are modular and can be installed relatively quickly, a large construction workforce won't be required, reducing the need for worker accommodation in the local community and the pressure this would otherwise put on housing affordability. The proposal will therefore not cut across or offend the achievement of well-located growth in residential areas or affect housing affordability.
Liveable communities	Liveable, well-designed and serviced communities are delivered to support wellbeing and enhance quality of life.	The proposal ensures that the region supports the local economy and the community in general by helping to maintain a reliable and resilient electricity system through the energy transformation. The project design will also support Queensland's transition to a low-carbon energy system and will help achieve the State's renewable energy targets.
Agriculture	The resources that agriculture depends on are protected to support the long-term viability and growth of the agricultural sector.	Gilbert and Sutherland have confirmed that there is no material impact on high-quality agricultural land. Refer to their advice contained in Attachment 18. The subject site is not mapped as containing any Strategic Cropping Land, Priority Agricultural Areas or Agricultural Class A or B Land. In addition, the site does not contain or adjoin a stock route network. Further, the site has not historically been utilised for large scale agricultural activities, although it is used for low density cattle grazing.

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		The development site (inclusive of the HV Substation) will occupy an area of approximately 23 hectares out of a total site area of 1277 hectares, of which approximately 600 hectares is used for cattle grazing. Accordingly, the loss of usable agricultural land is less than 4%. Battery Storage Facilities are a modular development type that are lightly affixed to the land. This means the facilities are able to be readily removed upon decommissioning, with the land able to be returned to its pre-development state and as such the long-term productive capacity of the future rural land is not compromised.
Development and construction	Employment needs, economic growth, and a strong development and construction sector are supported by facilitating a range of residential, commercial, retail, industrial and mixed use development opportunities.	The proposal ensures that the region supports the local economy by helping to maintain a reliable and resilient electricity system through the energy transformation. The relatively modest construction workforce is expected to provide a stimulus to local businesses such as convenience store, cafes, motels/hotel and service station, through increased demand for food and beverage, short term accommodation and fuel.
Mining and extractive resources	Extractive resources are protected and mineral, coal, petroleum and gas resources are appropriately considered to support the productive use of resources, a strong mining and resource industry, economical supply of construction materials, and avoid land use conflicts where possible.	The proposal does not involve mining or extractive resources, and does not impact upon any existing or historical Mining resources and infrastructure permits.
Tourism	Tourism planning and development opportunities	The proposal does not involve tourism.

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	that are appropriate and sustainable are supported, and the social, cultural and natural values underpinning tourism developments are protected.	
Biodiversity	Matters of environmental significance are valued and protected, and the health and resilience of biodiversity is maintained or enhanced to support ecological processes.	There are mapped areas of Matters of State Environmental Significance relating to the waterways/drainage features and vegetation across the site which are avoided by both property boundaries, layout of the development and establishment of appropriate buffers. Please refer to the Ecological Report at Attachment 4.
Coastal environment	The coastal environment is protected and enhanced, while supporting opportunities for coastal-dependent development, compatible urban form, and maintaining appropriate public use of and access to, and along, state coastal land.	The site is not within a Coastal Management District, nor subject to any coastal hazards. The proposed stormwater management and water containment system will prevent any contaminated runoff resulting from an on-site fire or explosion from entering surface water or groundwater and potentially impacting the Baffle Creek catchment or Great Barrier Reef Marine Park. Refer to WMS Stormwater Management Report within Attachment 6.
Cultural heritage	The cultural heritage significance of heritage places and heritage areas, including places of Aboriginal and Torres Strait Islander cultural heritage, is conserved for the benefit of the community and future generations.	The Applicant is committed to complying with its Cultural Heritage Duty of Care for the project and note that: • As the site is freehold, Native Title has been extinguished. • First Nations Bailai, Gurang, Gooreng Gooreng, Taribelang Bunda People Aboriginal Corporation RNTBC ICN 8650 ('PBC') is the registered Cultural Heritage Party for the adjoining waterway. • There are no registered cultural heritage sites upon the site as

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		confirmed via a Cultural Heritage Search contained in Attachment 8. • Historical aerial imagery confirms continued, significant vegetation clearance over the area to be developed. • It is acknowledged that 'residual heritage values' may exist within rocky outcrops, sand ridges, watercourses and wetlands on the site. The Applicant has approached the PBC with a view to having a cultural heritage assessment undertaken for the subject site and, if appropriate, negotiation of a Cultural Heritage Management Plan ('CHMP'). The Applicant will continue to monitor the requirements and need for a cultural heritage assessment and once a final investment decision and layout has been confirmed, a decision with respect to negotiation of a CHMP will be confirmed.
Water quality	The environmental values and quality of Queensland waters are protected and enhanced.	Water quality will be managed through retention of natural and vegetated swales to ensure water quality is maintained in accordance with the SPP Code. Please refer to the Flood Assessment and Stormwater Management Plan at Attachment 6.
Emissions and hazardous activities	Community health and safety, and the natural and built environment, are protected from potential adverse impacts of emissions and hazardous activities. The operation of appropriately established industrial development, major infrastructure, and sport and recreation activities is ensured.	A Hazard Analysis has been carried out by Arriscar to address the relevant risks associated with battery developments, which is within Attachment 5. A detailed Operational Emergency Management Plan (OEMP), Construction Environmental Management Plan (CEMP) and a final Fire Safety Study (FSS) will be prepared prior to commencement of construction. These plans will provide well-defined incident response strategies and procedures that will ensure rapid detection, clear communication and coordinated action with Queensland Fire Department and/or local emergency services.

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Natural hazards, risk and resilience	The risks associated with natural hazards, including the projected impacts of climate change, are avoided or mitigated to protect people and property and enhance the community's resilience to natural hazards.	The proposal does not occur on land affected by landslide or storm tide inundation. While the development is located on land subject to bushfire hazard, development is not for a sensitive land use as it does not increase the number of people or property on the site. A Bushfire Mitigation Report has been prepared for the site and is included as Attachment 11. Land susceptible to flood has been identified by WMS and excluded from the development envelopes as shown in the Flood Assessment and Stormwater Management Plan contained in Attachment 6.
Energy and water supply	The timely, safe, affordable and reliable provision and operation of electricity and water supply infrastructure is supported and renewable energy development is enabled.	The proposed battery development will be a significant addition to the region's major electricity infrastructure which services major industrial users in Gladstone State Development Area, Gladstone Port and other locations in the Gladstone region. The use of grid forming storage inverters in the Rutherglen Storage Project allows energy to be exported to the grid in a way which strengthens (not weakens) the transmission network. The system design will help maintain a reliable and resilient electricity system through the energy transition as well as helping achieve the State's renewable energy targets. The Rutherglen Storage Project, as a major addition to Queensland's storage capacity, will help shield the State from both global shocks and domestic demand surges, helping drive electricity prices lower for the benefit of all Queenslanders Engineering and flooding assessments confirm the development can be constructed and operated to ensure it will not compromise water quality or degrade the land.

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Infrastructure integration	The benefits of past and ongoing investment in infrastructure and facilities are maximised through integrated land use planning.	Both Powerlink and Ergon have provided responses as part of the previous application, a copy of which is provided as Attachment 15. In addition, a Preliminary Connection Enquiry has been made with Powerlink which confirms both capacity of the line and suitability of the project for connection to the grid.
Transport infrastructure	The safe and efficient movement of people and goods is enabled, and land use patterns that encourage sustainable transport are supported.	PTT undertook a detailed Traffic Impact Assessment and Concept OSOM strategy for the project. The purpose of the assessment was to evaluate the required access arrangements traffic generation and impact on the surrounding road network. A copy of their reports is provided for reference in Attachment 7.
Strategic airports and aviation facilities	The operation of strategic airports and aviation facilities is protected, and the growth and development of Queensland's aviation industry is supported.	The site is not affected by airport infrastructure.
Strategic ports	The operation of strategic ports and priority ports is protected and their growth and development is supported.	The site is not affected by port infrastructure. As most of the BSF componentry will be manufactured offshore and arrive in Australia through the Port of Gladstone, the project will provide additional throughput that will support the growth and development of Port of Gladstone.

We note that there are no temporary State Planning Policies applying to the site or the development.

7.1.6.5 LOCAL PLANNING PROVISIONS

Within the *Gladstone Regional Council Planning Scheme* (v2.1), the site is included within the Rural Zone and is affected by a number of Overlays, including:

6. Biodiversity (MSES – Regional Ecosystems and Essential Habitat);

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7. Bushfire Hazard (across all sites – Very High and High along western and eastern sides (associated with more dense vegetation), with balance being medium hazard);
8. Building Heights and Frontages (adjoins area along eastern edge);
9. Regional Infrastructure (mid-section – Powerlink transmission line);
10. Scenic Amenities (eastern section along steeper section); and
11. Steep Land (eastern section).

STRATEGIC FRAMEWORK

A summary of the development in relation to the Strategic Framework is provided in Table 6 below.

Table 6: Strategic Framework Summary

STRATEGIC FRAMEWORK THEME AND SUMMARY OF RELEVANT OUTCOMES	COMPLIANCE SUMMARY
Gateway to the World The strategic outcomes focus on Gladstone's role as a world class 'industrial city' with major industries of state and global importance. It also recognises agricultural and rural and uses as a valuable economic and social resource with fragmentation not supported. Major electricity, bulk water infrastructure and pipeline corridors including into the Gladstone State Development Area, Gladstone Power Station and Gladstone Port are protected from encroachment by development that would compromise their integrity and function.	The proposed battery development will be a significant addition to the region's major electricity infrastructure which services major industrial users in Gladstone State Development Area, Gladstone Port and other locations in the Gladstone region. The use of grid forming storage inverters in the Rutherglen Storage Project allows energy to be exported to the grid in a way which strengthens (not weakens) the transmission network. The system design will help maintain a reliable and resilient electricity system through the energy transition as well as helping achieve the State's renewable energy targets. While located on rural land, the site is not high- quality agricultural land, with low density cattle grazing being the current highest and best use. Cattle grazing can continue to occur in the undeveloped areas of the project site during the lifespan of the Project. Engineering and flooding assessments confirm the development can be constructed and operated to ensure it will not compromise water quality or degrade the land.
Community Living Housing growth, mix and affordability in urban areas.	This is not considered directly relevant to the proposal, given the focus on residential development to accommodate growth. Batteries can improve the efficiency of the energy system and keep prices low by storing excess daytime electricity and releasing it in the evening and at night. This reduces price swings on the energy spot market by shifting daytime supply to meet evening demand, helping to reduce

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	electricity prices and provide a market for excess daytime energy generation of all types. This will help alleviate cost of living pressures and increase disposable income available for home ownership or rental accommodation. As the batteries are modular and can be installed relatively quickly, a large construction workforce won't be required, reducing the need for worker accommodation in the local community and the pressure this would otherwise put on housing affordability. The proposal will therefore not cut across or offend the achievement of well-located growth in residential areas or affect housing affordability.
Connecting Our Place Connecting community through community wellbeing, people and places, transport, freight and global information and communication networks.	Again, while not entirely relevant to the development proposal itself, as this theme is focussed on urban development and connections, the proposal ensures that the Gladstone Region supports the local economy and the community in general by helping to maintain a reliable and resilient electricity system through the energy transformation. The project design will also support Queensland's transition to a low-carbon energy system and will help achieve the State's renewable energy targets.
Building it Better – Our Urban Areas Urban redevelopment, new neighbourhoods, density and infrastructure planning and investment.	As the proposal is within the Rural Zone, this strategic element is not directly or indirectly applicable to the development.
Our Environment and Heritage Sustainable management of the natural environment and resources, recreational space and resilience to environmental change and natural hazards.	The layout of the development has been informed through a basic assessment of mapped ecological features, which have then been avoided through site selection for the development footprint and the establishment of appropriate buffers. On ground assessments will continue to occur to further refine the layout to ensure that the development does not result in a significant impact on protected wildlife and associated habitats and areas of high ecological value. The development can be constructed and operated in a manner that ensures the environmental values of the site and adjoining sites are not affected by the development. The battery storage facilities will not

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	be installed near protected vegetation areas or biodiversity areas and the development will not pose an unacceptable risk to flora and fauna. Further, the layout has been informed through detailed site assessments to ensure the development components are not located on land that is subject to flood, bushfire or other natural hazard. Safety considerations in relation to fire and explosion risk have been accounted for in the choice of battery technology, operating system and risk management plans. While there is no known heritage sites on the development site, further reengagement and a general duty of care is acknowledged as part of the process.
Our Rural and Coastal Townships and Places	Bororen is considered a 'highway town', which is not intended to accommodate urban scale development or large residential development. Rural fragmentation is also not supported. The proposal will not impact on the overall function of Bororen and not place an unnecessary burden on the services provided in town. The modest construction workforce is expected to provide a stimulus to local businesses such as convenience store, cafes, motels/hotel and service station, through increased demand for food and beverage, short term accommodation and fuel. For more detail refer to the Social Impact Assessment prepared by ERM and included at Attachment 9

RURAL ZONE CODE

The land is entirely located within the Rural zone, the purpose of which is to:

(a) Provide for rural uses and activities;
(b) Provide for other uses and activities which are compatible with
  (i) existing and future rural uses and activities; and
  (ii) the character and environmental features of the zone
(c) Maintain the capacity of land for rural uses and activities by protecting and managing significant natural resources and processes.

This site has not historically been utilised for large scale agricultural activities; although it does contain low density stocking of cattle which is a Rural use. It is particularly relevant to note that the site is not mapped as containing Agricultural Class A or B land.

The proposed Battery Storage Facility is considered compatible with the existing and future rural uses, character and environmental features of the Rural Zone, having regard to the following:

- Battery Storage Facilities are generally fixed in terms of their locational attributes – that is, they are required to be located on land that is generally quite flat, mostly cleared in areas having low ecological

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value, have low risk of flooding, suitable geotechnical conditions, within close proximity to a transmission line or substation, and supported by a road network that provides (or can be easily be upgraded to provide) well graded, wide vehicular access – these characteristics are met by the project site.

- The site is not mapped as containing Strategic Cropping Land or Priority Agricultural Land.
- The design provides sufficient buffers to key environmental features (i.e., watercourses and remnant vegetation); as such, the development is compatible with environmental and landscape character features.
- The fact battery storage facilities are a modular development type that are lightly affixed to the land means the facilities are able to be readily removed upon decommissioning, with the land able to be returned to its pre-development state and as such the long-term productive capacity of the rural land is not compromised. This is confirmed through the Decommissioning and Security Plan included as Attachment 23.
- Proposed Lots 1 and 4 will not be titled until the BESS and DCA Substation are constructed to avoid any potential for smaller freehold lots to be created absent the purpose intended. Lot 2 is required to be created prior to the construction of the HV Substation and to overcome any potential for that lot to be created without construction of the intended purpose, it is proposed to establish a statutory covenant over Lot 2. Such a covenant would prevent the land from being used for other non-agricultural uses if the HV Substation approval is not acted upon. The grant of the covenant could be a condition of the development approval, as contemplated under section 97A (6A) of the Land Title Act. The balance of Lot 3 (1,254 ha) will be available for rural purposes.
- The lifespan of a typical BSF is 20 years (and with necessary upgrades and replacements, could extend further) and is therefore 'temporary' in nature.
- The character and environmental features of the site will be largely unchanged. The proposed development footprint (inclusive of the HV Substation) will be confined to an area of approximately 23 hectares in the centre of the project site and adjacent the existing transmission lines. Essentially, the development will appear as an extension to the existing electricity infrastructure that exists within the project site, and which contributes to the existing character of the site and the wider landscape. In addition, the visual assessment undertaken shows that there is minimal visual intrusion of the development upon public viewpoints, which is largely obscured by the proposed earth berm.

In summary, the development will preserve the long-term capacity of the land for rural uses whilst being designed and operated in a manner that is relatively low-profile and respectful of adjoining sensitive land uses and receptors. The size, type and location of the development is entirely compatible with the existing electricity infrastructure within the project site and will not diminish or materially alter the rural character of the site or the wider landscape.

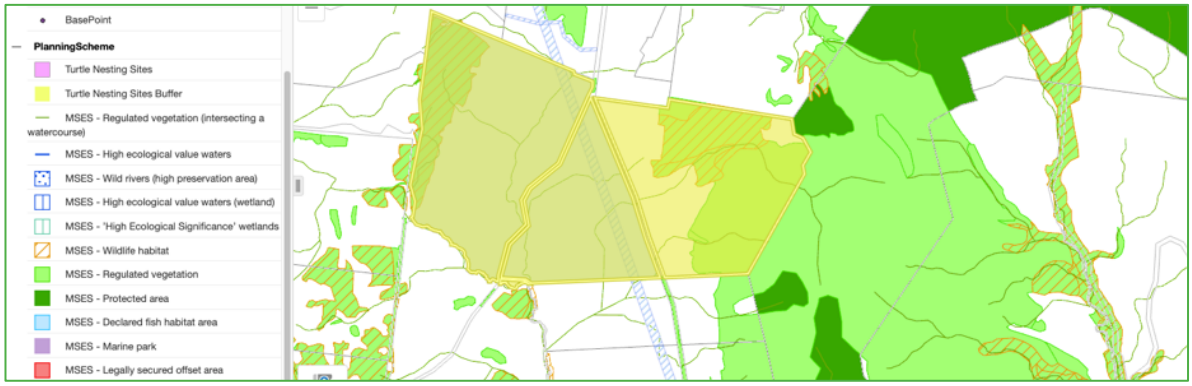
OVERLAY CODES

BIODIVERSITY OVERLAY CODE

The project site is mapped as containing Matters of State Environmental Significance including Essential Habitat and Regulated Vegetation as shown in Figure 19 below.

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Figure 19: Biodiversity Overlay Mapping (source: Gladstone Regional Council Mapping)



The layout includes sufficient buffers to the edge of the mapped vegetation and mapped watercourses as follows:

- 50m from the centreline of the mapped watercourses (Stream order 1 and 2);
- More than 100m from the edge of Regulated Vegetation.

Section 8.2.3.1 of Council's Biodiversity Overlay Code states:

'*This code applies to development where the code is identified as applicable in the table of assessment for the biodiversity overlay code and applies to any of the following areas identified on the overlay maps:*

1. *Matters of State Environmental Significance (MSES) overlay map:*
    a. *MSES – regulated vegetation (intersecting a watercourse).*
    b. *MSES – high ecological value waters.*
    c. *MSES – high ecological value waters (wetland).*
    d. *MSES – wild rivers (high preservation area).*
    e. *MSES – 'high ecological significance' wetlands (also referred to as a Wetland Protection area).*
    f. *MSES – wildlife habitat.*
    g. *MSES – regulated vegetation.*
    h. *MSES – protected area.*
    i. *MSES – declared fish habitat.*
    j. *MSES – marine park.*
    k. *MSES – legally secured offset area.*

This is generally consistent with the definition of Matters of State Environmental Significance within the *State Planning Policy 2017* version, which has not been adequately integrated within the planning scheme per section 2.1. Accordingly, the mapping related to the Overlay is per the State Planning Policy Mapping (July 2017 version), which is included as Attachment 12 and for completeness, also includes the Matters of State Environmental Significance report for the site, including those features defined under the *Environmental Offsets Act 2014*.

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To be clear, the requirements relate only to the MSES as stated in the Overlay and shown in the SPP Mapping. On that basis, the following outlines how the development has been designed to avoid Matters of State Environmental Significance[1].

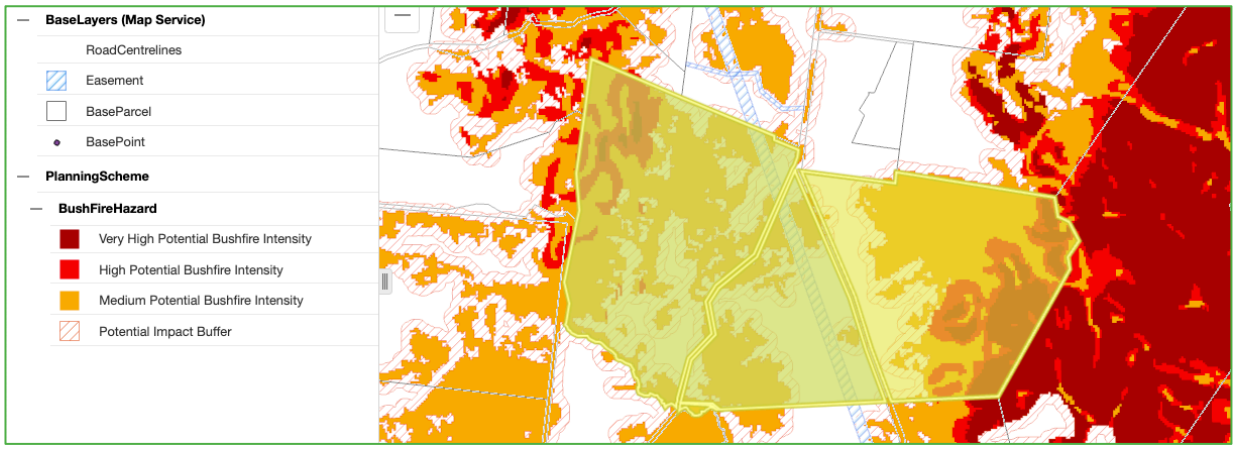
The site does not contain any protected areas or marine parks. Eurimbula National Park adjoins the site to the East which is a Protected Area, and the development is setback further than 1km from the common boundary.

The layout of the project was informed by a desktop assessment and field survey based on vegetation and watercourses mapped under the *Vegetation Management Act 1999* and *Fisheries Act 1994* being the Regulated Vegetation (Watercourse) mapping layer and Qld Waterways for waterway barrier works layers respectively. Watercourses mapped under the *Vegetation Management Act 1999* require a 'defined distance' to be achieved which is outlined in State Code 16: Native Vegetation Clearing (Table 2). That is, a minimum of 10m for Stream order 1 and 2, and 25m for Stream order 3 and 4. The minimum distance has been exceeded for all infrastructure proposed on-site.

BUSHFIRE OVERLAY CODE

The subject site is mapped as containing areas of Very High, High and Medium Potential bushfire intensity with the areas surrounding this identified as potential impact buffer as shown in Figure 20 below. This largely reflects remnant vegetation mapping, and also reflects the State Planning Policy Bushfire mapping.

Figure 20: Bushfire Overlay Mapping



The Bushfire Overlay Code requires that the development provides a site-specific bushfire hazard assessment to demonstrate that the development provides sufficient water supply and does not increase the risk to people or property, as well as provide appropriate road and fire access trails.

Eldon Bottcher Architects have prepared a Bushfire Mitigation Report for the site and is included as Attachment 11 – this assessment confirms that for bushfire purposes, a 100m buffer from the edge of the

[1] *Matters of State Environmental Significance as defined in the Biodiversity Overlay Code and State Planning Policy.*

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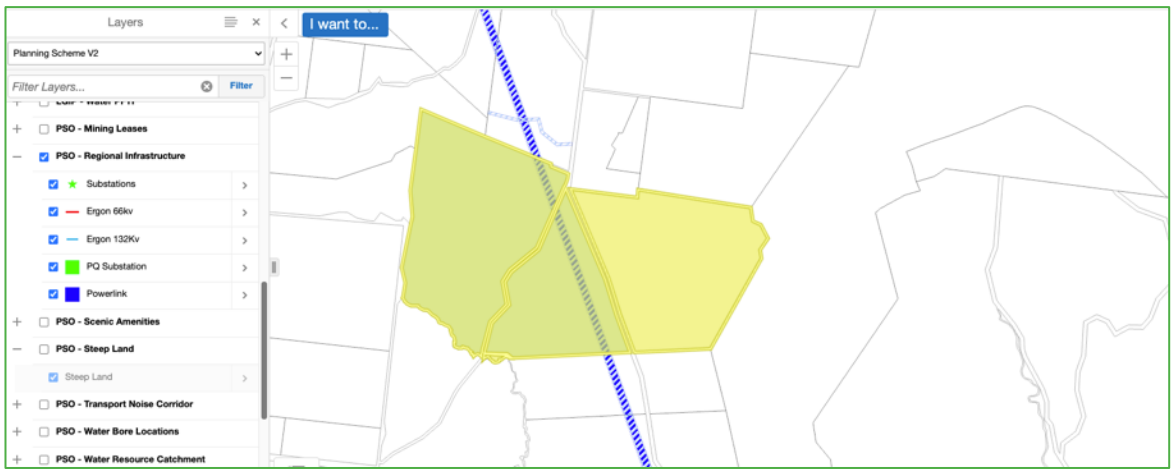
development components is sufficient to mitigate bushfire hazard. The project is setback further than 100m from vegetation which comprises a bushfire hazard on the site.

Overall, the development is capable of complying with the requirements of the Bushfire Hazard Overlay Code.

REGIONAL INFRASTRUCTURE OVERLAY CODE

The subject site is mapped as containing a Powerlink Easement as shown in Figure 21 below.

Figure 21: Regional Infrastructure Mapping



The relevant Code requires that a 3m landscape buffer is provided, where adjoining major electricity infrastructure, incorporating advanced trees and shrubs that will grow to a minimum height of 10m. Minimum clearances under Schedules 4 and 5 of the *Electrical Safety Regulations 2002* are required to be maintained, with no earthworks undertaken within 20m of a transmission tower or pole or 10m of a distribution infrastructure tower or pole.

Given that the proposal contemplates a cut in to the transmission line and will include infrastructure that is located directly adjacent to the easement, the separation will not be achieved for those project components. However, setbacks to the Battery components have been established from the existing transmission infrastructure as required by the Code.

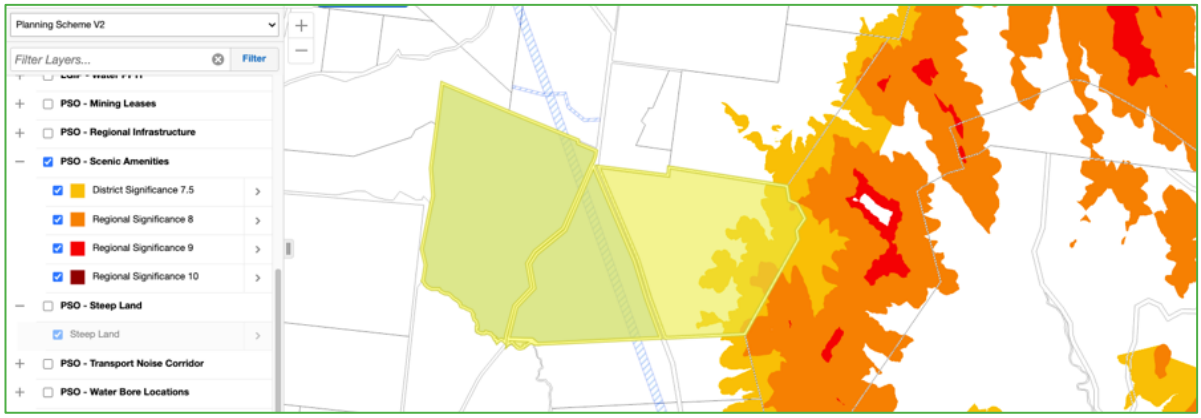
As such, the proposal complies or is capable of complying with the Regional Infrastructure Overlay Code.

SCENIC AMENITY OVERLAY CODE

The eastern part of the site which contains the foothills of the Westwood Ranges is considered District Significance 7.5 as shown in Figure 22 below. As no development is located within the mapped area, the Scenic Amenity Overlay Code is not considered to apply.

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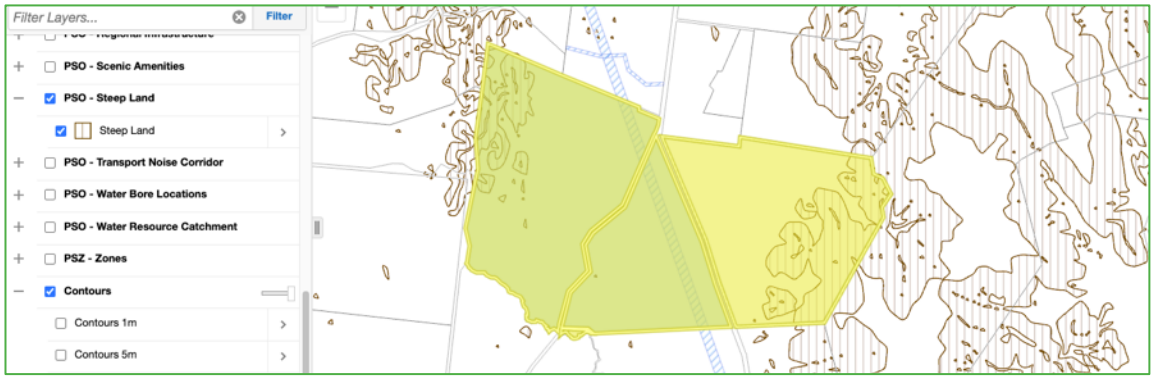
Figure 22: Scenic Amenity Overlay Mapping



STEEP LAND OVERLAY CODE

Both Eastern and Western parts of the site contain mountain ranges which include sections of steep land (i.e. grades of 15% or greater) as shown in Figure 23 below. The development is compliant with the acceptable outcomes of the code, as no part of the development is located on the land identified on the Steep Land Overlay Code.

Figure 23: Steep Land Overlay Mapping



DEVELOPMENT CODES

DEVELOPMENT DESIGN CODE

This Code requires all development to achieve the minimum infrastructure standards including:

- Infrastructure provision including water, sewer, stormwater, access and parking;
- Impacts of development on the environment and amenity of the locality area are avoided.

In relation to compliance of the proposal:

- Potable water can be supplied on-site as per the Engineering Design Planning Scheme Policy through existing bores, dams, water tanks and the like, with appropriate pumps and filters provided to ensure drinking water meets appropriate standards. Ongoing potable water supply is only required for the on-site management with temporary maintenance staff expected to be responsible for individual supply.

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- On-site wastewater treatment will be provided for permanent staff via domestic sewerage treatment systems in accordance with Engineering Design Planning Scheme Policy and Australian Standards which will maintain ecological processes. This will include conventional domestic sewerage treatment plants, septic tanks, composting systems or holding tanks.
- Electricity and telecommunications are provided to site (or provisioned for in the case of telecommunications).
- Firefighting infrastructure is provided through access to sufficient water sources in the form of 2 x 180,000L above ground tanks and 300,000L excavated detention basins). Appropriate fittings on water tanks will be provided.
- As demonstrated in Attachment 6, stormwater can be managed to ensure there is no increase in flood level flow velocity or duration upstream, downstream or on adjacent properties; and is designed and constructed in accordance with the Engineering Design Planning Scheme Policy.
- An Erosion and Sediment Control Plan, prepared by a suitably qualified person that considers both construction and operational aspects of the development, can be provided as a condition of approval.
- All earthworks will be designed and constructed in accordance with the Engineering Design Planning Scheme Policy.
- Access driveways, internal roads and manoeuvring areas will be designed and constructed in accordance with the Engineering Design Planning Scheme Policy and certified by an RPEQ as part of a future Operational Works approval.
- Waste and storage of waste will be provided on-site in accordance with the Waste Management Planning Scheme Policy and will be detailed in a Construction Environmental Management Plan to ensure waste is managed appropriately during construction.

Accordingly, the proposal is compliant, or capable of complying (through conditions) with relevant assessment benchmarks of the Development Design Code.

LANDSCAPING CODE

Due to the relatively isolated nature of the site, the presence of existing vegetation across the site and the proposed layout of the development including the proposed earth berm, it is not anticipated that significant landscaping will be necessary, except where required to screen the view of the project from public view points along Red Hill Road. The development may be conditioned to provide further landscaping details, where necessary.

7.1.6.6 DEVELOPMENT APPROVAL FOR, AND ANY LAWFUL USE OF, THE PREMISES OR ADJACENT PREMISES

There are no known development approvals over the subject site, which has been continually used for cattle grazing and electricity transmission since 1985.

Adjoining the site to the north, the 'Eurimbula PV and Storage Project' (DA/14/2018) was initially approved in 2018 by way of Negotiated Decision Notice which issued a Development Permit for a Material Change of Use (Code assessable) for a Renewable Energy Facility and Substation.

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A Minor Change pursuant to s81 of the *Planning Act 2016* was approved in April 2023 which included the following changes to the original approval:

- Revised location of the BSF;
- Increase in the BSF size from 81.3MW/163MWh to 1GW/2GWh;
- Increase in solar array from 300MWdc to 750MWdc; and
- The relocation and/or addition of a substation (for the BSF).

Accordingly, the 'changed' approval includes a Development Permit for a Renewable Energy Facility, Substation and Battery Storage Facility. To the best of our knowledge, the approval has not progressed to construction, with the currency period due to expire on 29 August 2026. We understand that Council have recently refused an application to extend the currency period, which was subsequently appealed by the applicant in early August 2025. The outcome of the appeal is unknown at this stage.

The application is relevant to the proposal in that overall, the proposal will complement the approved development (if constructed) by providing grid forming and strengthening infrastructure to the overall transmission system.

7.1.6.7 OTHER RELEVANT MATTERS

In assessing the application, SARA, as part of the assessment of the common material, must consider any other relevant matters raised in the Development Application. Accordingly, the following are considered relevant to the assessment of the application.

1. Consistency with advancing the Gladstone Regional Economic Transition Roadmap

Electricity generation has been a significant part of the development of Gladstone both in terms of employment and character of the area since the early 1970's, through the establishment and operation of Queensland's largest Power Station, located at Callemondah. It also continues to be an important focus to support future economic growth in Gladstone as a world class industrial city.

The *Gladstone Region Economic Transition Roadmap*, released in October 2022 identifies renewable energy as a key driver to diversify its traditional industrial base. Increased emission and reduction targets to support renewables growth is considered one of the key themes to deliver energy security, reliability and affordability. This requires:

- building enough renewable energy, **firming, storage, transmission and distribution to reliably and affordably meet current and future demands**;
- constructing and upgrading the infrastructure (eg transmission, transport) needed to support the renewable energy sector; and
- investing in the infrastructure needed to develop the hydrogen supply chain which requires available renewable energy.

The proposed Rutherglen storage facility will support Queensland's transition from traditional forms of generation which rely on burning carbon intensive fossil fuels to a low-carbon energy system and will help achieve the State's renewable energy targets. The BSF will ensure future demand is met by providing storage and firming elements that are necessary for the reliable transmission and supply of

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electricity to key industrial sectors and support growth more generally, together with helping to reduce electricity prices for all Queenslanders.

2. Compliance with Higher Order State Policies

(a) The proposed storage development provides firming for the grid which will help maintain a reliable and resilient electricity system, which in turn supports the overall development of renewable energy in Queensland.

(b) The proposed storage development supports the renewable energy agenda for Queensland in general. Between 2015 and 2021 Queensland's renewable energy sector contributed over $10 billion of investment across the State and supported more than 7,000 construction jobs. The proportion of electricity generated by renewable sources has grown from less than 8% in 2015 to more than 20% in 2021 (Source: Technical Discussion Paper, Delivering Queensland Renewable Energy Zones, 2021)

(c) The proposed development supports the Energy Roadmap released by the Queensland Government:

- Critical network upgrades and reinforcement of the transmission network in Gladstone must be commissioned by 2029 to ensure ongoing system security and reliability and toexpand the network; as well as replacement of Calliope – Wurdong and Calliope – Larcome 275kV lines. The transmission lines traversing the site will form part of the overall network upgrade, and the longer term upgrades to these lines have been accommodated for within the future easement corridor.
- 4.3GW of short duration storage is required to optimise variable energy generation and maximise system efficiency. The Rutherglen Storage Project will contribute up to 400MW of capacity to meet this target.
- The Roadmap notes the likely retirement of the Gladstone Power Station by 2029, which provides 1,680MW of baseload power. Short duration storage is critical to support the committed renewable projects which have been announced to help replace the base load power currently provided by the Gladstone Power Station.
- Focus on gas fired generation capacity in Gladstone, supported by short duration storage projects, such as the Rutherglen BSF.

(d) The proximity of the proposed storage development to electricity transmission lines allows a direct connection without the need for new easements or other land access arrangements. This is consistent with the goals of the State Planning Policy as the development provides an opportunity to efficiently leverage the State's existing transmission infrastructure in the transition to a low-carbon energy system. In addition, the site's key features (see section 3(a) below) were critical in determining the suitability of the project site for a BSF development.

3. Compatibility with rural area

(a) Infrastructure projects such as Battery Storage Facilities have specific locational requirements which are met by the project site in terms of:

- elevation;
- slope gradient and topography;

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- proximity to electricity transmission infrastructure;
- located on land that is largely cleared;
- located on land that is generally free of flooding and coastal constraints;
- located in an area where the proposed development will have very limited visual or other amenity impacts on neighbours or the general public;
- not located on prime agricultural land;
- well graded, wide vehicular access;
- proximity to major road, rail and port infrastructure during the project construction period; and
- access to workers and worker accommodation in Gladstone region during the project construction period.

(b) The land is not suitable for large scale cropping or other agriculture uses and is only suitable for low density cattle stocking, which is able to continue (if desired) on the undeveloped areas of the site throughout the lifespan of the project.

(c) The nature of the development being 20+ years (or with necessary upgrades and replacements, up to 40 years), provides an opportunity for the land to be returned to its pre-development state and used for rural production if it is not practical or feasible to continue using the land as a Battery Storage Facility after the proposed development has reached the end of its economic life. This will largely depend on the new technologies which exist at that time and how the renewable energy sector has evolved.

(d) The character and environmental features of the site will be largely unchanged by the proposed development. The development footprint will be confined to an area of approximately 23 hectares in the centre of the project site and adjacent the existing transmission lines. The development will read as part of the electricity infrastructure which already exists within the site and which contributes to the existing character of the site and the wider rural landscape.

4. Ability to manage impacts and absence of unacceptable impacts

(a) The project layout has been informed through detailed assessments including:

i. Bushfire Mitigation Report, prepared by Eldon Bottcher Architects and included as Attachment 11, which confirms the project can be developed and operated without increasing the hazard to people or property.

ii. Flood and Stormwater Management Assessment, prepared by WMS and included as Attachment 6, which ensures the location of the infrastructure is not within known flood areas and can be designed to appropriately manage stormwater such that no nuisance is caused upstream or downstream.

iii. Traffic Assessment, prepared by PTT and included as Attachment 7, which confirms that the construction and operational traffic can be safely managed, with appropriate upgrades to be of longer term benefit to the local community.

iv. Visual montages, prepared by Hayman+Charlton Architects confirms minimal impacts upon areas of scenic amenity due to the proposed berm.

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v. Hazard Analysis, prepared by Arriscar at Attachment 5, that concludes that there is minimal risk of fire or explosion due to the battery technology that is being used and the proposed mitigation and fire intervention measures

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8.0 Conclusion

This report supports a Development Application by Red Hill Renewable Energy Pty Ltd to the Chief Executive for a Development Permit for Material Change of Use for a Battery Storage Facility (including ancillary infrastructure) and Reconfiguring a Lot (1 into 4 lots including access easement).

The Rutherglen Storage Project includes a Battery Storage Facility, a DCA Substation and HV Substation, with ancillary infrastructure, to be located on 3 individual lots, with a balance lot to continue in rural use.

The proposal is strategically and locationally justified. It aligns with Queensland's energy transition by delivering up to 400MW of storage capacity in the Gladstone region and is appropriately sited on cleared land directly adjacent to existing 275kV transmission infrastructure.,.

The technical assessments support the suitability of the development. They confirm the proposal avoids unacceptable impacts on ecological values, can manage flood, stormwater, bushfire and hazard risks, and will not result in unacceptable noise, visual or traffic impacts. The project has also been supported by social impact assessment, community consultation and an executed Community Benefit Agreement.

Overall, the Rutherglen Storage Project is an appropriate form of development on the project site, is consistent with the relevant State and local planning framework and is capable of complying with the applicable assessment benchmarks. The application should therefore be approved, subject to reasonable and relevant conditions.

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