

11 June 2026

SLR Ref No.: 620.041534.00001-L01-Cobden RFI Response v1.0-20260610

Attention: Belinda Casic
Department of Transport and Planning
GPO Box 2392
Melbourne VIC 3001

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SLR Project No.: 620.041535.00031

RE: Response to Request for Further Information – Cover Letter
Planning Permit Application PA2604197
Cobden BESS – 89 Cobden-Scotts Creek Road, Cobden VIC 3266

1.0 Introduction

This correspondence has been prepared by SLR Consulting Australia Pty Ltd (SLR) on behalf of Cobden BESS Pty Ltd in response to Department of Transport and Planning's (DTP) Request for Further Information (RFI) for Planning Application PA2604198, relating to the proposed Battery Energy Storage System (BESS) at 89 Cobden-Scotts Creek Road, Cobden VIC 3266 (Cobden BESS).

The submitted planning application sought approval for the use and development of land for a utility installation under the Farming Zone, and to create or alter access to a road in a Transport Zone 2 (TRZ2).

This letter provides a formal response to DTP's RFI letter dated 16 February 2026 to assist in the assessment of PA2604198.

The section below provides a response to each of the items raised by DTP.

1.1 Submission

As part of this Request for Information (RFI), the full suite of application documents has been resubmitted to the Department of Transport and Planning (DTP) to enable assessment of a complete application package. The status of each document from the previous submission is outlined in Table 1 below.

Table 1 Document Status

Document	Status
Appendix A – Development Plans	Updated.
Appendix B – Certificate of Title	Unchanged from the original submission.
Appendix C – Flood Assessment Gap Analysis	Unchanged from the original submission.
Appendix D – Preliminary Site Investigation – Contamination	Unchanged from the original submission.
Appendix E – Geotechnical Desktop Study	Unchanged from the original submission.
Appendix F – Noise Impact Assessment	New document.
Appendix G – Stormwater Management Plan	New document.
Appendix H – Bushfire Risk Assessment	New document.

Document	Status
Appendix I – Hazards and Risk Assessment	New document.
Appendix J – Traffic Impact Assessment	New document.
Appendix K – Native Vegetation Assessment	New document.
Appendix L – Landscape Character and Visual Impact Assessment	New document.

2.0 Section 50 Amendment

As part of this Request for Further Information submission, a number of amendments to the proposal have been made in response to updated technical documentation and comments from DTP. Accordingly, an amendment pursuant to Section 50 of the *Planning and Environment Act 1987* has been submitted.

The key changes to the application are as follows:

- Removal of one (1) battery container per enclosure, resulting in a total of up to 66 containers and a revised battery rack ratio of 1 inverter to 3 batteries.
- Inclusion of 5m wide landscape screening along the entire perimeter of the Project Area.
- Provision of additional internal roads, hydrant locations, and associated infrastructure reconfiguration.
- A 4m high noise wall around substation transformer.

The Development Plans, Planning Report and all supporting technical documentation have been updated to reflect these changes. Refer to Table 2 for a comparison of the previous and proposed development specifications. Refer to Figure 1 and Figure 2 for the previous and revised Plans, respectively.

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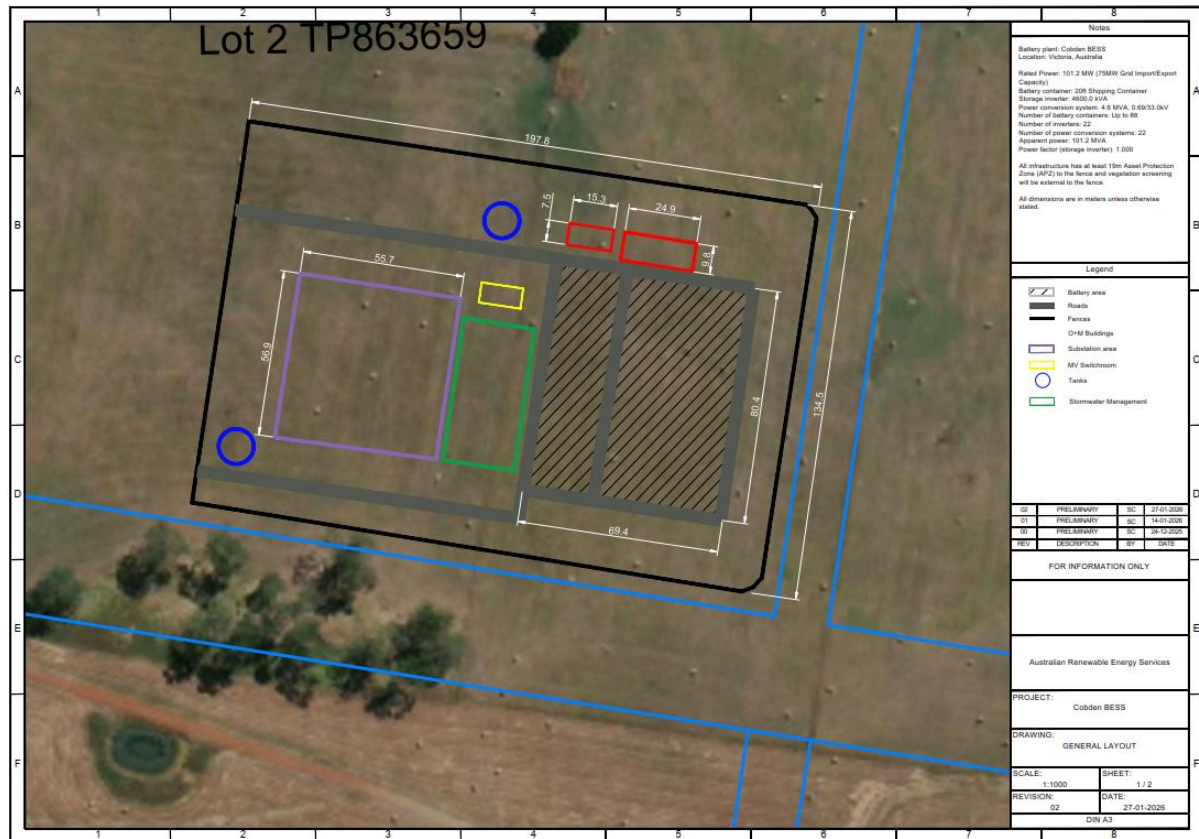
Table 2 Previous vs Revised Specifications

Specification	Previous	Revised
No. of Battery Containers	Up to 88	Up to 66
No. of Battery Racks per Enclosure	4-6	3
Battery Container	20ft Battery Energy Storage System	20ft Battery Energy Storage System
Storage Inverter	4600.0 kVA	4600.0 kVA
Power Conversion system	4.6 MVA, 0.69/33.0kV	4.6 MVA, 0.69/33.0kV
Dimensions	L: 6058mm x W: 2438mm x H: 2896mm (20 foot high cube shipping container)	L: 6058mm x W: 2438mm x H: 2896mm (20 foot high cube shipping container)
Weight	<18t	<18t
Battery Chemistry	Lithium-iron-phosphate	Lithium-iron-phosphate
Inverters	22	22
MV Transformers	22	22



Specification	Previous	Revised
Substation	1 x 66/33kV Transformer, 2 x 66kV lines out	1 x 66/33kV Transformer, 2 x 66kV lines out

Figure 1 Previous Plan



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Figure 2 Revised Plan



3.0 Response to RFI

#	Requested Information	Response
Amended Application Form		
1.	The application form amended to include all permit triggers.	Please refer to the enclosed Application Form. The following permit triggers continue to apply to the proposal: - Clause 35.07-1 Use of Land (Farming Zone) - Clause 35.07-4 Buildings and Works (Farming Zone) - Clause 52.29-2 Create or alter access to a road in a Transport Zone 2 (Land Adjacent to the Principal Road Network)
Lodgement of the following outstanding reports/plans including but not limited to:		
2.	Landscape Plan	The Landscape Plan is included in Appendix C of the enclosed Landscape Character and Visual Impact Assessment (LVIA), provided at Appendix L.
3.	Assessment of the proposal against the CFA's 'Guidelines for Renewable Energy Installations'.	An assessment of the proposal against CFA's 'Guidelines for Renewable Energy Installations' is provided in Section 7.3.1 of the enclosed Planning Report.

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#	Requested Information	Response
		Refer to Appendix H for the Bushfire Risk Assessment which has been prepared based on these guidelines.
4.	<i>Visual Impact Assessment</i>	A detailed summary of the findings of the Landscape Character and Visual Impact Assessment (LVIA) is provided in Section 7.10 of the enclosed Planning Report. Please refer to the LVIA at Appendix L for a detailed assessment.
5.	<i>Agricultural Impact Assessment</i>	An Agricultural Impact Assessment is not considered necessary for this application. The proposal for a Battery Energy Storage System will not result in the loss or fragmentation of productive agricultural land and will not impact the operation of surrounding farming activities. The site can accommodate the proposed use without creating land use conflict or constraining existing or future agricultural uses in the locality. The development has been designed to sit comfortably within the rural context and does not introduce off-site impacts (such as noise, traffic or amenity issues) that would affect agricultural productivity. Importantly, the project is reversible, with the land capable of being returned to agricultural use once decommissioned. Noting the above, the proposal does not present any agricultural impacts, and an Agricultural Impact Assessment is not considered necessary. Refer to Section 7.11 of the Planning Report for additional detail.
6.	<i>Biodiversity Impact Assessment</i>	It is considered that a standalone Biodiversity Impact Assessment is not necessary for this application as the biodiversity considerations of the site have been appropriately assessed within the Native Vegetation Assessment, provided at Appendix K. The Native Vegetation Assessment included both a desktop review (including EPBC Protected Matters Search and State database interrogation) and a field-based survey, which is typical of a biodiversity assessment in Victoria. This confirmed the following: • The Project Area is entirely located within highly modified land, comprising improved/modified pasture associated with agricultural use (cattle grazing). • No native vegetation occurs within the Project Area, and therefore no removal of native vegetation is proposed. • Mapped native vegetation occurs only outside the Project Area (i.e. isolated patches beyond impact areas). • Vegetation surrounding the dwelling is planted vegetation and qualifies for the

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#	Requested Information	Response
		Clause 52.17 exemption as it is planted vegetation (Cl. 52.17-7) and therefore not native vegetation; - No threatened flora or fauna species listed under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) or the Flora and Fauna Guarantee Act 1988 (FFG Act) were recorded during the field assessment. - The Subject Site does not provide suitable habitat capable of supporting listed threatened species. - The proposal is unlikely to result in a significant impact on any Matters of National Environmental Significance (MNES), and therefore referral under the EPBC Act is not required. In addition: - The Subject Site is located within Location Category 1, indicating low biodiversity sensitivity. - As no native vegetation removal is proposed, the project does not trigger the need for Biodiversity assessment. Noting the above, it is considered that the submitted Native Vegetation Assessment sufficiently assesses the biodiversity values of the Subject Site and demonstrates that the proposal will not result in significant biodiversity impacts. As such, the preparation of a standalone Biodiversity Impact Assessment would not provide any additional information.
7.	<i>Native Vegetation Removal Report if any native vegetation is proposed to be removed.</i>	A detailed summary of the findings of the Native Vegetation Assessment is provided in Section 7.6 of the enclosed Planning Report. No native vegetation is proposed to be removed under Clause 52.17. Please refer to Appendix K for a detailed assessment.
8.	<i>Noise Impact Assessment</i>	A detailed summary of the findings of the Noise Impact Assessment is provided in Section 7.8 of the enclosed Planning Report. Please refer to the NIA at Appendix F for a detailed assessment.
9.	<i>Stormwater Management Plan</i>	A detailed summary of the findings of the Stormwater Management Plan (SMP) is provided in Section 7.9 of the enclosed Planning Report. Please refer to the SMP at Appendix G for a detailed assessment.
10.	<i>Traffic Impact Assessment</i>	A detailed summary of the findings of the Traffic Impact Assessment (TIA) is provided in Section 7.7 of the enclosed Planning Report.

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#	Requested Information	Response
		Please refer to the TIA at Appendix J for a detailed assessment.

3.1 Preliminary Assessment

In addition to the items requested above, DTP has provided the following preliminary comments for consideration at this stage of the application. Responses to each of the comments raised are provided below.

Preliminary Comment	Response
<i>As there are works occurring within the Cobden-Port Campbell road reserve for the powerline connection, consent from the relevant road authority (Head, Transport for Victoria) will be required for the application being made and for the proposed use or development. Head, Transport for Victoria can be contacted via statutory.planning@raods.vic.gov.au.</i>	This matter was acknowledged in the submitted Planning Report. It was identified that consent from the Head, Transport for Victoria (HTfV) would be required for works within the Cobden Port Campbell Road reserve associated with the powerline connection. Following lodgement of the application in January 2026, consultation has been undertaken with HTfV, including a meeting to discuss the proposal in detail. Following this meeting, HTfV issued a Clearance Letter confirming its support for the proposal, subject to conditions which is enclosed in this submission. Further details regarding this consultation and outcome are provided in Section 4.1 of this letter.
<i>Please note that as the proposal requires the submission of outstanding reports/plans and may result in additional permit triggers, you are required to lodge a Section 50 amendment once all documents are ready to be lodged.</i>	It is confirmed that no additional permit triggers have arisen from the findings of the outstanding reports. A Section 50 Amendment has been submitted as part of this RFI lodgement to amend the current proposal in response to technical documentation and DTP comments. The proposed changes are outlined in Section 1 of this letter.
<i>Please ensure that all application documents are consistent, and that any updates/amendments made to the development plans in response to the above are all consistent with the relevant assessments (e.g., ensure the infrastructure assessed in the noise report is the same as that which is shown on the plans).</i>	Following finalisation of the requested technical documentation, all application materials have been updated to ensure consistency across the complete application package.

4.0 Regulatory Engagement

4.1 Head, Transport for Victoria

A planning permit is triggered under Clause 52.29 (Land Adjacent to Transport Zone 2), requiring referral of the application to the Head, Transport for Victoria (HTfV). Following submission of the application documentation in January 2026, a meeting was held on 17 March 2026 between SLR, ARES and representatives from HTfV, including Laura Hooper and Dave Fary, to discuss the Project in detail.



The meeting sought to obtain in-principle support for the Project and to discuss key transport matters, including:

- Access to Cobden-Port Campbell Road, including access location, sight distance requirements and design considerations
- Intersection treatments, including the temporary removal and reinstatement of concrete medians at the Cobden–Warrnambool Road / Cobden-Port Campbell Road intersection to facilitate OSOM vehicle movements
- Potential road upgrades
- Construction vehicle access arrangements
- Planning permit requirements

HTfV indicated support for the proposal and subsequently issued the enclosed Clearance Letter dated 20 March 2026, outlining general conditions to be addressed and incorporated into the Planning Permit.

4.2 Country Fire Authority

The site is located within a designated bushfire prone area, and engagement with the Country Fire Authority (CFA) has been undertaken to support consideration of bushfire risk and emergency management requirements. Following submission of the application documentation, a meeting was held on 23 March 2026 between SLR, ARES and representatives from the CFA, including Matthew Allen, Peter Lockwood and Ben Taylor, to discuss the proposal in detail.

The purpose of this meeting was to seek in-principle support for the proposal and to obtain CFA input on key bushfire and emergency management considerations, including:

- The overall risk profile of the development, including CFA's general perception of risks associated with Battery Energy Storage System (BESS) facilities and approaches to managing internal container fire events
- Availability of local CFA resources, including appliance capabilities and typical hose diameters likely to be utilised at the site
- Insights from recent Victorian bushfire events, including lessons learned relevant to emergency planning for the facility
- Advice regarding the proposed BAL-12.5 outcome and associated Asset Protection Zones (APZ)
- Any specific CFA requirements to be incorporated into the project design, having regard to the CFA's Renewable Energy Facility Guidelines

At that meeting, the CFA indicated they would be willing to review the Bushfire Risk Assessment prior to lodgement. However, no formal feedback had been received from the CFA at the time of lodgement.

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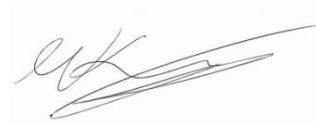
5.0 Conclusion

We trust the information provided is sufficient to support DTP's assessment of the application. However, should any additional information be required, we respectfully request an extension of up to two months to allow for its preparation and submission.

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Appendices:

Head, Transport for Victoria Clearance Letter

Application Form

Planning Report

Appendix A – Development Plans

Appendix B – Certificate of Title

Appendix C – Flood Assessment Gap Analysis

Appendix D – Preliminary Site Investigation – Contamination

Appendix E – Geotechnical Desktop Study

Appendix F – Noise Impact Assessment

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