Fraser Solar Farm BESS

Section 72 Amendment Assessment Report

ENTURA-1224546187-41
13 March 2026

Prepared by Hydro-Electric Corporation ABN48 072 377 158

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1. Introduction

South Energy, on behalf of Frasers Lane Development Pty Ltd, is seeking an amendment to their existing permit for the approved Frasers Solar Farm (PA1900723). The approved solar farm is on the corner of Frasers Lane and Traralgon-Maffra Road in Glengarry North, Victoria.

The amendment is being undertaken pursuant to section 72 of the *Planning and Environment Act 1987* (PE Act) and will include a 90 MW/936MWh capacity Battery Energy Storage System (BESS) on a new parcel of land to the south of the approved solar farm (Figure 1.1).

Figure 1.1: BESS footprint relative to land parcel and adjacent Frasers Solar Farm

Entura has been engaged by the applicant to undertake a planning assessment to demonstrate compliance with the relevant planning provisions of the Latrobe Planning Scheme (the 'planning scheme') applicable to the proposed development and any additional legislative requirements of the PE Act, beyond section 72.

The Planning Assessment Report accompanies the application for a planning permit amendment and has been systematically structured to identify and address all of the relevant planning policies and development standards set out in the planning scheme.

Table 1.1 summarises the details relevant to the land subject to the amendment.

Table 1.1: Project details

Category	Detail
Property Address	1205 Traralgon-Maffra Road, Glengarry North, VIC
Title Details	125B\PP3627 (CT 8295/427)
Zone	Clause 35.07 – Farming Zone (FZ)
Overlay	There are no overlays affecting this land however there is an overlay in the vicinity of the land: Clause 44.03 – Floodway Overlay (FO, RFO)
Land Use	Renewable energy facility Utility installation
Particular Provisions	Clause 52.17 – Native Vegetation Clause 53.13 – Renewable Energy Facility (other than wind facility)
Planning Permit Trigger	FZ – use and development Native Vegetation – use and development
Applicant	South Energy

1.1 Application structure

The information provided in this report will supplement the information already provided as part of the *Frasers Solar Farm Planning Assessment Report, 2020* (Appendix A). In several instances, the information and assessment required for the BESS are addressed as part of the solar farm assessment. To avoid repetition, relevant sections of this report will cross-reference Appendix A. Broadly, this report will include:

- An introduction to the overall site and the development of the BESS to support the approved solar farm.
- An assessment of the proposed amendment against the relevant provisions of the planning scheme, building on the existing assessment of the solar farm.
- A summary of specialist studies prepared for the BESS site.

The certificate of title, as well as specialist studies referred to within the main report are included as appendices at the end of this report.

1.2 The proponent

The proponent of Frasers Solar Farm, South Energy, is an independent developer company dedicated to providing a sustainable future for the energy sector through the development of renewable energy projects across various technologies including solar, wind, battery storage, and hydrogen. As of March 2026, South Energy had nine separate projects currently moving through the approvals and initial construction stages across Victoria and Western Australia, including the Frasers Solar Farm. More information for South Energy can be found on their website: https://southenergy.com.au/

2. Amendment Proposal

2.1 Solar farm permit extension

The Frasers Solar Farm was approved on 10 September 2020 by Department of Transport and Planning (DTP) as the responsible authority under permit PA1900723.

The permit includes 83 separate conditions of approval pertaining to the Fraser Solar Farm. These conditions are currently under review by the proponent and will be addressed accordingly prior to the commencement of construction, where applicable.

Under section 69 of the PE Act, an extension of time to PA1900723 was granted by DTP in June 2024. As such the current permit expiry is subject to the following:

> *Planning permit PA1900723 will now expire if one of the following applies:*
>
> - *The development has not commenced by 10 September 2026*
> - *The development has not been completed by 10 September 2028.*
> - *The use has not commenced by 10 September 2028.*

South Energy will commence construction of the Frasers Solar Farm by September 2028. As such, as part of this amendment proposal, the proponent also requests an additional extension to PA1900723 to allow for construction commencement of the solar farm as well as allowing additional time for the implementation of the BESS facility.

2.1.1 Road upgrade design plan extension

Part of the Frasers Solar Farm approval included scope to upgrade Traralgon-Maffra Road and Frasers Lane. Detailed designs for these upgrades were prepared by South Energy and consequently endorsed by DTP on 24 June 2024.

The letter of endorsement for the designs outlines that the approval is valid for a period of 2 years. As such, South Energy is additionally seeking an extension to this endorsement to be in line with the updated solar farm permit, should the extension be granted.

2.2 BESS proposal

2.2.1 The site

The proposed BESS facility (the Project) will be located at 1205 Traralgon-Maffra Road Glengarry North, Victoria, directly south of the approved Frasers Solar Farm (the Approved Project) on the corner of Frasers Lane and Traralgon-Maffra Road. These are both approximately 6km south of Toongabbie and 7km north of Glengarry (Figure 2.1).

Figure 2.1: Frasers BESS project location

The Approved Project is situated across four parcels owned by one landowner, with a combined area of 107 ha. The BESS project will add a further 5 ha to the Approved Project, therefore the project site in totality will cover an area of 112 ha. Title information is included in Appendix B.

The 5 ha area designated for the BESS project results from a subdivision of the 25 ha block at 1205 Traralgon-Maffra Road (Figure 1.1). The subdivision has been approved on 16 October 2025 (2025/190). A copy of the planning permit is included in Appendix C.

The solar farm will connect to the MWTS-MFA (Morwell Terminal Station-Maffra) 66kV overhead transmission line, which runs adjacent to the eastern boundary on the Traralgon-Maffra Road reserve. Power generated from this facility will be transmitted to the electricity grid via overhead power lines connecting from the on-site substation to the overhead transmission line. For the BESS project, there are currently two proposed options for connection:

- Option 1 – the BESS will be connected to the network through a BESS substation within the 5ha footprint; or
- Option 2 – the BESS will connect directly to the solar farm substation whereby the solar farm substation will need to adapt a varied design and capacity to allow for the BESS.

Both options are viable within the total footprint of the Project and the Approved Project.

Similar to the Approved Project, the Project site is predominantly flat and has previously been used for grazing. There are no existing dwellings on the site which is currently fenced with standard post

and wire fencing. Some vegetation will need to be removed to accommodate Project development and use. This is discussed further in section 5.4.1.

Land use in the area surrounding the site is also predominantly agricultural. A map showing the buildings in the 2km vicinity of the site is shown in Figure 2.2. It should be noted however, that these buildings include sheds and other ancillary buildings and are not solely residential properties. Because the immediate area of the site is predominantly flat and gently sloping, the project site receives considerable sunlight over the course of the day.

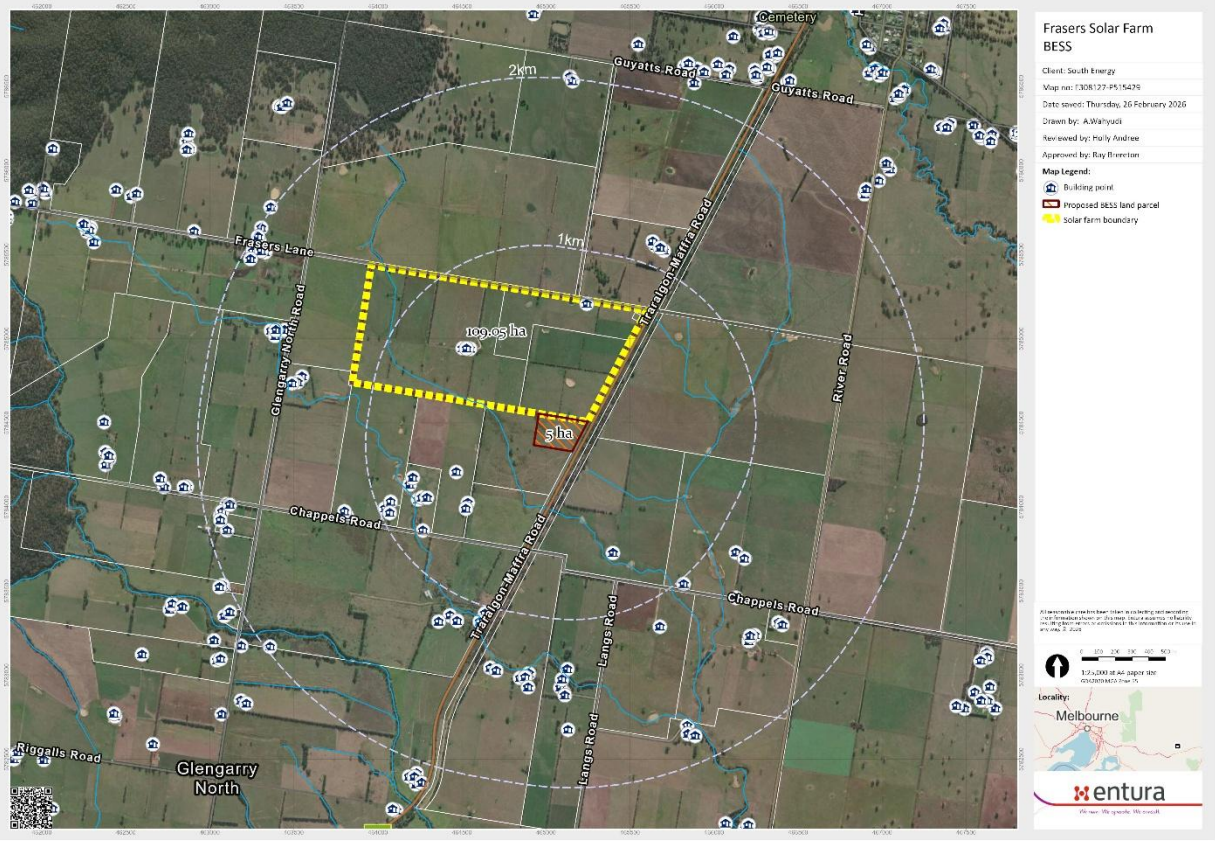

Figure 2.2: Building points within 2km of the BESS footprint

2.2.2 Description of works

In addition to the 75MW solar farm, the amended proposal will include a 936MWh BESS facility within the additional 5ha footprint. The facility will include 144 BESS modules with a maximum capacity of 6.5MWh each. The 144 BESS modules and associated power converter system (PCS) containers will take up approximately half of the 5ha Project footprint. The other half will include the necessary switchgear and operating and maintenance infrastructure required to support the BESS. The design layout for the Project has been included in Appendix D. It should be noted that the current design drawing includes an optional substation, as discussed per option 1 for network connection in section 2.1 above.

To support construction, the site will additionally include a laydown area as well as construction site offices and a construction carpark, all of which will be decommissioned and removed following the completion of project construction.

2.2.3 BESS specifications

The BESS type adopted for this Project will be a 5.01MWh liquid-cooled ESS. As mentioned, there will be 144 BESS modules. The modules will consist of a 20-foot (approximately 7m) container, including:

- Battery racks
- Integrated cabinets
- Automatic fire fighting system (including flame retardant system and fire alarm)
- Liquid-cooled system (temperature control system)
- Heat insulation system
- Independent power supply system
- Other equipment (such as caballing) to support energy storage and flow in and out of the BESS.

The modules have been designed according to the standard 20-foot container size, for convenient transportation. The container structure design is mainly steel with shell protection to ensure the modules do not corrode and are resilient to elements such as dust, sand, ultraviolet rays, and water seepage/leakage.

2.2.4 Access

Access and circulation roads have also been proposed for the Project. Access to the Project site will be internally via the Approved Project site and as such no further driveways or road crossings off Traralgon-Maffra Road will be required as part of the amendment. A more detailed review of site access and circulation is included in section 4.1 and Appendix E.

The intersection of Frasers Lane and Traralgon-Maffra Road was upgraded as part of the requirements of the original planning permit.

2.2.5 Site fencing

As with the Approved Project, the Project site will be closed to the general public throughout the construction and operational phases. An approximately 2.4m high standard security mesh fence will be installed around the perimeter of the entire site (solar farm and BESS) per industry practice, with access only available via lockable gates. Fencing will be implemented at the beginning of construction and will remain for the duration of operation.

Fencing around the perimeter of the site will be designed to reduce impacts on wildlife that may occur as a result of fauna species attempting to move through the landscape where fencing has been erected. Furthermore, the proposed fencing will be designed to withstand flood events and debris, and will protect the proposed perimeter landscaping, ensuring that the BESS and solar farm infrastructure are secure.

The exact design specifications of the fencing are not yet determined and will be finalised during the detailed design phase of the Project. Typical security fence elevations have been included in Appendix A.

Per the conditions for PA1900723, temporary fencing will further be provided in the following instances:

- Condition 6 – *"Temporary stock-proof fencing must be provided around the landscaping if grazing is to occur during planting establishment, until the landscaping is sufficiently established to the satisfaction of the responsible authority."*
- Condition 9 (I, ii) – *"the erection of a native vegetation protection fence around all native vegetation to be retained on site and on any adjoining road reserves"*
- Condition 71 – *"Before works start, a native vegetation protection fence must be erected around the tree protection zone of all scattered trees to be retained. This fence must be erected at a radius of 12x the diameter at breast height (DBH) to a maximum of 15 metres but no less than 2 metres from the base of the trunk of the tree. The protection fence must be constructed of star pickets, chain mesh or similar to the satisfaction of the responsible authority. The protection fence must remain in place until all works are completed to the satisfaction of the responsible authority."*

The above will be addressed through the implementation of a Construction Environmental Management Plan (CEMP) to be implemented prior to construction commencement. Implementation of the CEMP is discussed in further detail in section 2.4 of this report.

2.2.6 Temporary construction facilities

The Approved Project is expected to require approximately 16 months to construct, commencing in by September 2028. Construction and implementation of the BESS will occur concurrently with the Approved Project.

A 60x60m area in the northeast corner of the Project site will be used as a construction compound. This will include a laydown area, site offices, and a carpark and will support the temporary construction buildings proposed within the Approved Project footprint. Construction compounds are temporary and will be removed following the completion of construction.

2.2.7 Hours

Similarly to the Approved Project, construction operations for the Project will take place between 7.00am and 6.00pm, Monday to Friday and 7.00am and 1.00pm on Saturdays. This remains in line with the recommended construction noise hours per the Environment Protection Authority Victoria. No external floodlighting will be used during construction or operation.

2.3 Landscaping

Landscaping will be used to improve the condition and amenity of the Approved Project as needed and will also help minimise visual impacts from the development. Planting of appropriate vegetation of varying height and density, with a minimum of 2m, will provide satisfactory screening along the site boundaries wherever required, noting that some areas of the site cannot be vegetated in order to maintain asset fire protection zones. The landscape buffer will contain a variety of indigenous species characterised by local plant communities.

It is anticipated that the Project site will include similar landscaping plans, allowing for bushfire management where required and as necessary.

2.4 Environmental Management and required plans

In June 2023 the following reports and plans for the Frasers Solar Farm were submitted to DTP and consequently endorsed in December 2023:

- Environmental Management Plan prepared by NGH and GRS consultants titled 'Frasers Solar Farm – Project Number: 23-0048' and dated August 2023 (required under condition 7 of PA1900723).
- Construction Environment Management Plan prepared by South Energy GRS consultants titled 'Frasers Solar Farm', revision A3 and dated 24 August 2023 (required under condition 9 of PA1900723).
- Drainage, Stormwater and Erosion control plan prepared by Entura titled 'Frasers Solar Farm' and dated 13 December 2023 (required under condition 10 of PA1900723).
- Native Vegetation Management Plan prepared by NGH consultants titled 'Frasers Solar Farm' and dated 14 April 2023 (required under condition 11 of PA1900723).
- Glint and Glare assessment prepared by Entura consultants titled 'Frasers Solar Farm – Glint and glare assessment' and dated 23 June 2023 (required under condition 12 of PA1900723).
- Predictive noise assessment prepared by ARUP consultants titled 'Frasers Solar Farm noise assessment reference: AC01', version 2 and dated 9 July 2023 (required under condition 16 of PA1900723).
- Complaints Investigation and Response Plan (CIRP) prepared by South Energy GRS consultants titled 'Frasers Solar Farm', revision A2 and dated 9 May 2023 (required under condition 34 of PA1900723).
- Native vegetation credit ID 2023-0800 (required under condition 75 of PA1900723).

Based on the above, additional management plans or amendments to the existing plans will be prepared, where necessary, to address the inclusion of the new land parcel the specific risks associated with BESS infrastructure.

3. Legislative framework

All relevant legislation to the project is discussed in detail in section 5 of Appendix A. In most cases, all legislation relevant to the Approved Project is similarly relevant to the Project. As with the solar farm, the implementation of the BESS facility will **not** require:

- A referral under the *Environment Protection and Biodiversity Act 1999;*
- An Environment Effects Statement under the *Environment Effects Act 1978;* or
- A Protected Flora Licence or Permit under the *Flora and Fauna Guarantee Act 1988*.

Additional legislation relevant to key matters is further detailed below in section 1.

4. Key matters

4.1 Traffic

A traffic and transport assessment was prepared by OneMileGrid for the BESS project. The report is provided in Appendix E.

The Project is proposed to be accessed internally via the Approved Project site. The Project therefore does not require any traffic management onto external roads outside of what has already been proposed as part of the Approved Project (refer section 6.10 of Appendix A). Based on the findings outlined in Appendix E, the planned road upgrades to the Traralgon-Maffra Road/Frasers Lane intersection, as part of the Approved Project, are considered appropriate in catering for the proposed BESS.

Based on the site's connection to the surrounding road network, particularly Princess Highway to the south, it is expected that the majority of traffic movements to and from the site will, similarly to the Approved Project, be made via Traralgon-Maffra road to the south west (Figure 4.1).

Source: OpenStreetMap

Figure 4.1: Proposed transport route

Frasers Lane, Traralgon-Maffra Road, and the Princess Highway are all approved higher mass limit roads and are suitable for standard heavy vehicle deliveries to the site. The majority of heavy vehicle movements to accommodate the Project will be with 20 m tandem tipper and trailers, or 19/20m articulated vehicles (semi-trailers). The approved upgrades to the Traralgon-Maffra Road / Frasers Lane intersection has been designed to accommodate vehicles up to 35.4 m A-triples, and are therefore considered appropriate to allow for the safe and efficient movement of all construction related heavy vehicle traffic. Any oversize over mass (OSOM) vehicles required for the Project will similarly be accommodated by the same proposed access route.

It is anticipated that there will be short-term elevated vehicle movements during the construction phase of both the BESS and solar farm. These movements however are expected to have minimal impact on the operation of the existing road network due to the relatively low traffic volumes in the

area, where volumes generated by development are expected to be easily absorbed into the surrounding network.

It is acknowledged that the combination of both projects will increase daily traffic volumes along Frasers Lane by approximately 240 vehicles per day (during the peak construction period). Currently, Frasers Lane carries approximately 50 vehicles per weekday. The proposed access for the site is located 50m from the Traralgon-Maffra Road intersection and will therefore only impact a small portion of Frasers Lane. As such, the Project is not expected to cause significant impacts to road users or significantly impact pavement deterioration. Regardless, the section of pavement used on Frasers Lane will be regularly monitored for any damage during construction, as recommended in Appendix E.

4.2 Noise

A noise impact assessment was prepared by SLR Acoustics for the BESS project. The report is provided in Appendix F.

The assessment has been undertaken pursuant to the Victorian EPA Publication 1826.4 *"Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises and entertainment venues"* (the noise protocol) – being the primary assessment tool for the determination of unreasonable noise from commercial and industrial premises. The assessment has been prepared based noise limits in rural areas for utility installations, as further discussed in section 3 of Appendix F.

Ten sensitive receivers were identified within 2km of the Project area, one of which is project involved. The predictive noise modelling undertaken in relation to these receivers incorporates operational noise emissions from both the BESS facility and the solar farm. Accordingly, the applicable project-specific noise limits for the combined operation of the BESS and the solar farm within a rural area under the noise protocol include:

- Day (7am – 6pm): 45 dBA
- Evening (6pm – 10pm): 39 dBA
- Night (10pm – 7am): 34 dBA

Results from the cumulative operational model indicates that the above noise limits can be achieved at all sensitive receivers if the following measures are implemented:

- Equipment Manufacturer (OEM) treatment for the modules/battery containers and inverter units; and
- Installing a 6m high noise barrier along the southern and western boundaries of the Project site to provide shielding to the nearest – as indicated on the site layout (Appendix D).

Low frequency noise was also assessed in accordance with Victorian EPA publication 1996 *"Noise Guidelines: Assessing low frequency noise"*. Under these guidelines, low frequency noise is defined by significant acoustic energy within a frequency range defined by one-third octave bands 10Hz to 160Hz, often perceived as thumping or humming. The results from the low frequency noise assessment indicates no exceedances of the predicted frequency bands and therefore presents a low risk of adverse low frequency noise effects on sensitive receivers.

It is understood that there may be additional noise impacts during construction, as a result of increased traffic and minor ground works and installation. However, construction will only take

place during daytime on weekdays and Saturdays, thus it is considered that the temporary noise pollution is acceptable.

4.3 Natural values

A natural values assessment was prepared by Entura for the BESS project. The report is provided in Appendix G.

Desktop and field investigations for the Project site were undertaken by a suitably qualified ecologist in February 2026.

The investigations found no threatened flora or fauna species within the site nor any mapped wetlands. One large dead tree was recorded in the northeastern corner of the Project site, meeting the definition of a large scattered tree under the *Guidelines for the removal, destruction or lopping of native vegetation*. This tree and its required buffer have been avoided in Project design with the closest infrastructure being an access road approximately 35m to the southwest of the tree.

There is a patch of *Juncus gregiflorus* at the western end of the site. This is considered to meet the definition of a patch of native vegetation under the *Guidelines for the removal, destruction or lopping of native vegetation*. This patch however is considered exempt from requiring a permit to remove native vegetation as discussed in section 5.2.4 of this report.

4.4 Cultural heritage

An Aboriginal and cultural heritage review was undertaken by Landskape for the BESS project site. The memo is provided in Appendix H.

The Project site has been assessed by a suitably qualified heritage advisor against the Victorian *Aboriginal Heritage Regulations 2018*. Under these regulations (r.7), an Aboriginal Cultural Heritage Management Plan is required if:

a) *All or part of the activity area for the activity is an area of cultural heritage sensitivity (not subject to significant ground disturbance); and*

b) *All or part of the activity is a high impact activity.*

Although the Project meets part B of this regulation – being a utility installation that will result in significant ground disturbance greater than 25m^2, constituting a high impact activity – the Project site is not located within an area of cultural heritage sensitivity. A mandatory Aboriginal Cultural Heritage Management Plan is therefore not required for the Project.

Additionally, the Victorian Aboriginal Heritage Register lists no previously identified Aboriginal cultural heritage places within the Project area.

In the unlikely event that any Aboriginal cultural heritage places or items are encountered during works, all activities likely to harm the identified material will cease immediately and will not recommence until the appropriate consultation and management measures have been implemented.

4.5 Landscape and visual impact

A landscape and visual impact assessment was prepared by SLR Consulting for the BESS project. The full report is provided in Appendix I.

The project site is characterised by flat topography in a rural setting. The assessment found that there would be no views of the BESS project from the townships of Glengarry and Toongabbie. Of the eight viewpoints that have been assessed, seven were rated as having an impact ranging from 'negligible' to 'minor', and one, at Traralgon-Maffra Road, as 'moderate'.

The viewpoint assessed as having 'moderate' impact is located approximately 100m from the project, on the verge of the Traralgon-Maffra Road (refer Figure 4.2). As such, it is expected that the project's key infrastructure will be clearly visible. However, for those travelling along the road, views of the project will be brief as observers will be passing through.

Figure 4.2: Viewpoint assessed as having 'moderate' visual impact (Source: SLR Consulting)

Key landscape features within the area, including Boola Boola State Forest, Moondarra State Park, and the Strzelecki Ranges will not be adversely affected by the proposed BESS project.

4.6 Surface water

A hydrology and flood study was prepared by GRS Engineering for the proposed BESS project. The full report is provided in Appendix J.

A detailed hydraulic assessment was conducted to understand the behaviour of surface water flow, including velocity and localised flooding. This assessment concluded that runoff flows across the BESS site is unlikely to form pools or low points which would then permanently accumulate flow, however deeper water levels may form in the east of the site where it reaches the road reserve. Further, runoff velocities are generally low, reducing the likelihood of erosion resulting from water movement.

Flood studies were conducted based on 1% AEP and 5% AEP events. These assessments suggest that the site does not pose significant flood risks. Any risks posed by flood however should be further minimised through applying the following measures:

- Designing drainage, undertaking earthworks, or undertaking other measures to redirect surface flow where structures will be affected by unacceptable depths, namely towards the east of the site.
- Implementing erosion control measures where flow velocities may lead to erosion (i.e. >0.6 m/s). Control measures could include energy dissipaters or soil stabilisers.
- Ensure the maintenance and cleaning of the road culverts located to the east of the Project site (on Traralgon-Maffra Road) to avoid higher/deeper water levels accumulating.

Relevant mitigation measures will be included in the CEMP and implemented during construction.

4.7 Bushfire

A bushfire risk management plan and fire safety study was prepared by Fire Risk Consultants for the BESS project. The full report is provided in Appendix K.

The risk assessment process assessed potential fire hazards common to the construction, commissioning, and operational phases of the Project. In accordance with the risk frameworks outlined in Appendix K, the residual risk profile (post implementation of recommended treatments) is considered to be low to moderate. This outcome reflects the technology and design considerations proposed for the Project, including:

- Integrated fire detection and suppression systems within each battery unit;
- Multiple above ground firefighting water storage tanks connected to AS2419.1-2021 compliant fire hydrant systems;
- Minimum 19m fire breaks between site fencing and BESS infrastructure;
- Emergency vehicle access compliant with model requirements, including roading specifications to accommodate emergency service vehicle weights up to 15 tonnes;
- A site-specific Fire Management Plan, and Emergency Management Plan; and
- Ongoing maintenance and monitoring protocols aligned with relevant Australian and international standards.

The proposed battery units (described in the section 2.2.3) have undergone UL9540A testing, validating their resilience against thermal runaway and fire spread. The site layout (Appendix D), infrastructure and operational procedures have been designed to mitigate the risk of fire to both onsite assets and the surrounding area. The broader landscape is considered to have a normal bushfire risk profile for a grassland dominated, predominantly agricultural area.

Through the use of existing measures to minimise risk as well as providing additional recommended treatments to ensure any present risks are effectively mitigated, Appendix K demonstrates that the Project meets the requirements of the *CFA Design Guidelines and model Requirements for Renewable Energy Facilities*.

5. Regulatory assessment

The proposed development is subject to the Latrobe Planning Scheme. Relevant provisions are discussed in this section.

5.1 Strategic Planning and Planning Frameworks

Section 7.1 of Appendix A provides a comprehensive review of the relevant planning frameworks and strategic objectives to the project, these include:

- The Victorian Policy Planning Framework (PPF)
- The Municipal Strategic Statement (MSS), and
- The Local Planning Policy Framework

Implementation of the BESS will similarly meet the relevant objectives in the above frameworks. Points of note relevant to the implementation of the BESS include:

- Where objectives such as protecting environmental values are discussed, the BESS site will further any mitigations or offsets required in addition to the solar farm site. Further, the BESS site has been located so to avoid significant impacts on local waterways. For example, the facility will sit in the front eastern portion of the property to avoid the section of Four Mile Creek that also cuts through south-western corner of the solar farm site.
- Construction and operation of the BESS will require more workers and therefore supporting employment in the area beyond what construction and operation of the solar will already contribute. This will further support the local economy through bringing more people to the area.
- The storage and firming capacity of the BESS will support efficient resource development and use by ensuring energy generated is not lost during peak periods.
- Similar to the solar farm, the BESS site is located on low quality agricultural land. The property for the BESS facility is proposed to be subdivided to ensure most of the land can remain to be used for grazing purposes in the future.

5.2 Latrobe Planning Scheme

The development is located within the Latrobe local government area, and as such is subject to the Latrobe Planning Scheme, administered under the *Planning and Environment Act 1987*.

5.2.1 Use classification

The approved use of the land for the solar farm has been classified as follows:

- The grid connection is classified as a **Utility Installation** as, despite being 66 kV, it is directly related to an **Energy generation facility**.
- The solar farm is classified as a **Renewable Energy Facility**, as it harnesses renewable energy sources from the sun.

The BESS facility will fall within the **Renewable Energy Facility** classification as it includes structures that will be used in connection with the generation of energy by renewable resource and will not be supplying energy for the existing use of the land.

5.2.2 Zone

Clause 35.07 – Farming Zone

Both the solar farm and BESS are located entirely within the **Farming Zone** (clause 35.07), as shown in Figure 5.1.

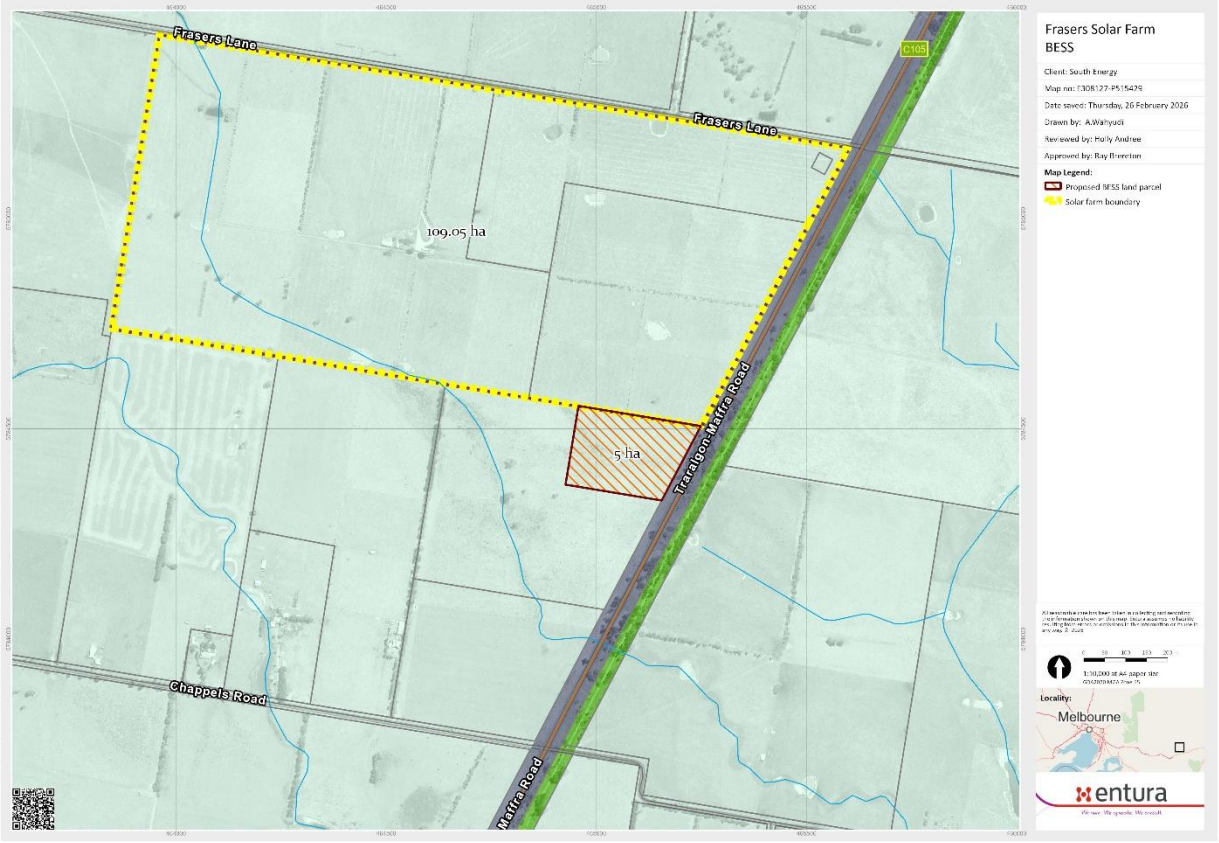

Figure 5.1: Farming Zone over Project site and adjacent Approved Project site

Within this zone a renewable Energy Facility is classed as a Section 2 (permit required).

It is considered that the amendment to the proposal furthers the zone purposes outlined in Clause 35.0, as justified in Table 5.1.

Table 5.1: Clause 35.0 (zone purpose) provisions

Zone Purpose	Response
To implement the Municipal Planning Strategy and the Planning Policy Framework.	The solar farm proposal has been assessed against the Planning Policy Framework in section 7.1 of Appendix A, which has subsequently been approved. It is considered that this amendment aligns with the solar farm which has already been justified to further the themes under the Latrobe Council vision and is suitable under the Local Planning Policy Framework.
To provide for the use of land for agriculture.	Along with the generation of renewable energy, the proposed solar farm will allow for continued partial grazing of low value agricultural land whilst the BESS site will be subdivided to ensure a large portion of the property remains accessible for agricultural purposes. Future full agriculture use will be reinstated following site decommission.
To encourage the retention of productive agricultural land.	The proposal and associated minimal earthworks will minimise disturbance to the land. Upon decommissioning at the end of the lifespan of the solar farm and BESS, the site will be reinstated to its agricultural use.
To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture.	The proposed solar farm and BESS will provide the farming business with a guaranteed income stream of at least 30 years, which will significantly assist to revive the agricultural ventures on site, and maintain its viability from a financial perspective. No new dwellings are proposed.
To encourage the retention of employment and population to support rural communities.	The site has been selected due to its low agricultural value. The proposal will therefore further the local economy and provide employment opportunities
To encourage use and development of land based on comprehensive and sustainable land management practices and infrastructure provision.	The creation of local jobs during the construction phase will provide economic benefits for local companies and employment for the local population. These will provide benefits to the local economy.

The BESS amendment is considered to also align with the existing justification for solar farm against the Decision Guidelines for the Farming Zone, as listed under Clause 35.07-6. The relevant guidelines are provided in Table 5.2.

Table 5.2: Clause 35.07-6 Decision Guidelines provisions

Decision Guidelines	Response
General Issues	
The Municipal Planning Strategy and the Planning Policy Framework.	The relevant provisions of the MSS and PPF, as well as zones and overlays provisions are identified and satisfactorily addressed in section 7 of Appendix A. It is considered the BESS facility supports what has already been outlined by the solar farm.
Any Regional Catchment Strategy and associated plan applying to the land.	No Regional Catchment Strategy is associated with the subject site.
The capability of the land to accommodate the proposed use or development, including the disposal of effluent.	The site is found to be suitable for the proposed development. It meets the relevant requirements of the Latrobe Planning Scheme. There will be no disposal of effluent which can impact on the natural values on site and in surrounding areas.
How the use or development relates to sustainable land management.	The proposed solar farm addresses the elements of sustainable land management by integrating the management of land and environmental resources to meet human living needs, such as the provision and firming of electricity.
Whether the site is suitable for the use or development and whether the proposal is compatible with adjoining and nearby land uses.	The development will not compromise adjacent land uses. The adjacent and nearby uses include power and terminal stations. The proposed solar farm and BESS continues the land use for energy provision, but by means of a more sustainable generation and storage method.
How the use and development makes use of existing infrastructure and services.	There is no electrical infrastructure currently on-site. A transmission line is located parallel to the eastern boundary on the road reserve. New electrical infrastructure will be constructed to connect the generated electricity to the electricity grid.
Agricultural issues and impacts from non-agricultural uses	
Whether the use or development will support and enhance agricultural production	The additional property will be subdivided to allow 20ha of the 25ha block to remain accessible for grazing.
Whether the use or development will adversely affect soil quality or permanently remove land from agricultural production.	The proposal will not cause effluent spillage or leakage. The use will not affect soil quality or result in permanent removal of land.

Decision Guidelines	Response
The potential for the use or development to limit the operation and expansion of adjoining and nearby agricultural uses.	The proposed solar farm and BESS is not expected to limit the potential of operation of adjoining or nearby uses. The proposal will also offer benefit to the surrounding uses particularly on a local level, including the generation and long-term storage of electricity from a renewable source.
The capacity of the site to sustain the agricultural use.	Partial agriculture use is expected to continue in the presence of the proposal such as through grazing of sheep after the construction phase is completed. The site is capable to be reinstated to its full agricultural use after decommissioning.
The agricultural qualities of the land, such as soil quality, access to water and access to rural infrastructure.	The proposed development will complement agricultural uses of the site. It will not prevent access to water and rural infrastructure.
Any integrated land management plan prepared for the site.	There was no identified need to prepare a land management plan as part of this development.
Dwelling issues	
Whether the dwelling will result in the loss or fragmentation of productive agricultural land.	No dwellings are proposed as part of the development.
Whether the dwelling will be adversely affected by agricultural activities on adjacent and nearby land due to dust, noise, odour, use of chemicals and farm machinery, traffic and hours of operation.	
Whether the dwelling will adversely affect the operation and expansion of adjoining and nearby agricultural uses.	
The potential for the proposal to lead to a concentration or proliferation of dwellings in the area and the impact of this on the use of the land for agriculture.	
Environmental issues	
The impact of the proposal on the natural physical features and resources of the area, in particular on soil and water quality.	The proposal does not result in any spillage or leakage, which would otherwise impact on the natural physical features or resources of the area. According to hydraulic modelling (see Appendix H), the likelihood of erosion due to water movement on site is low, however management measures have been proposed

Decision Guidelines	Response
	to ensure these impacts are as minimal as possible for the Project site.
The impact of the use or development on the flora and fauna on the site and its surrounds.	The site for the proposed development is largely cleared. To allow for the development, some native vegetation will need to be removed, which will be appropriately offset. No significant flora and fauna have been identified on the site.
The need to protect and enhance the biodiversity of the area, including the retention of vegetation and faunal habitat and the need to revegetate land including riparian buffers along waterways, gullies, ridgelines, property boundaries and saline discharge and recharge area.	The site is agricultural land which is used for grazing, and supports no habitat features which contributes to biodiversity. While a watercourse runs adjacent to the site, the siting of the BESS facility considerably stays clear of the flow path of the watercourse and is therefore not considered to have an impact on the watercourse. Development has also avoided named waterway, Four Mile Creek, in the northwestern corner of the proposed site.
The location of on-site effluent disposal areas to minimise the impact of nutrient loads on waterways and native vegetation.	The proposed use will not generate effluent that will impact waterways and native vegetation.
Design and siting issues	
The need to locate buildings in one area to avoid any adverse impacts on surrounding agricultural uses and to minimise the loss of productive agricultural land.	The solar farm site has capitalised on the area available to allow for panels and the supporting temporary infrastructure to support construction. As such, the BESS facility is required to be sited on a new parcel of land. To ensure as little impact as possible, all elements of the BESS facility have been designed and placed on the property in a way to ensure use of the whole property is not required. Of the 25ha property, only 5ha close to the eastern boundary will be required for the BESS facility. Thus, leaving ample space for agricultural uses to continue on the property.
The impact of the siting, design, height, bulk, colours and materials to be used, on the natural environment, major roads, vistas and water features and the measures to be undertaken to minimise any adverse impacts.	In line with the solar farm, the BESS facility will be setback a minimum of 10 m from the site boundary, which comprises of a 10m wide vegetation buffer and 10m wide access track. Although used as a fire buffer, the setback also ensures that visual impact is minimised from the road.

Decision Guidelines	Response
The impact on the character and appearance of the area or features of architectural, historic or scientific significance or of natural scenic beauty or importance.	The visual impact resulting from the solar farm on nearby uses and character of the area is low. Results from the assessment suggest that the visual impacts from the proposal is deemed acceptable given the neighbouring uses. There are no identified architectural, historic, scientific areas of significance within the area. Landscaping may be implemented to minimise visual impacts for the development.
The location and design of existing and proposed infrastructure including roads, gas, water, drainage, telecommunications and sewerage facilities.	There is no existing infrastructure on the proposed BESS facility site. The location of the BESS has been chosen to minimise visual clutter and ensure minimal impact to natural values whilst being sited in an appropriate location to support the operation of the solar farm.
Whether the use and development will require traffic management measures.	The use will not generate the need for traffic management measures. A traffic and transport assessment has been undertaken and determined that the existing eastern access on Frasers Lane is suitable to cater for the entering and exiting of vehicles, which will be used for both solar farm and BESS. There is minimal on-site activity required during the lifecycle of the project.

5.2.3 Overlays

According to VicPlan, there are no planning overlays that directly affect the proposed BESS site (Figure 5.2). There are floodway overlays within the vicinity of the site – approximately 1.5km to the south of the site and approximately 3km to the north near Toongabbie, as well as a Bushfire Management overlay approximately 1.5km northeast of the site.

Flood considerations have been addressed in Appendix J and bushfire risk is addressed in Appendix K.

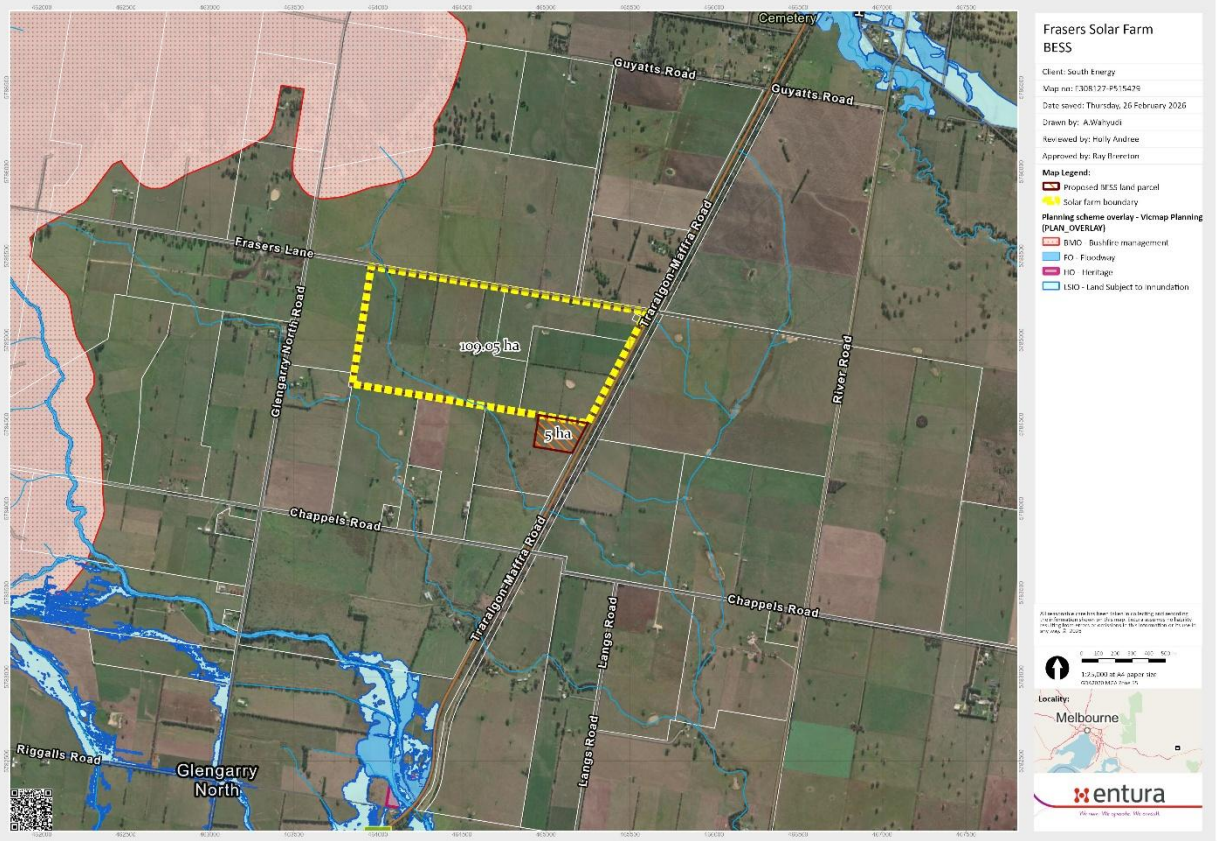

Figure 5.2: Overlays relevant to the Project site

5.2.4 Particular provisions

Particular provisions are specific provisions for particular uses and are applied in addition to the requirements of the zones and overlays. Three provisions were required to be considered for the Approved Project (see section 7.2.4 of Appendix A), two of which will also be applicable to the Project.

Clause 52.17 – Native Vegetation

This particular provision applies to the proposed works as it involves the removal of native vegetation. DEECA's *Guidelines for the Removal, Destruction or Lopping of Native Vegetation* (the Guidelines) has been addressed in the Biodiversity report, included in Appendix G.

There is an area of vegetation where at least 25 per cent of the total perennial understorey plant cover is native namely the area of *Juncus gregiflorus* at the western end of the site which would meet the definition of a patch of native vegetation as defined in the *Guidelines for the removal, destruction or lopping of native vegetation*. Namely that there is *'an area of vegetation where at least 25 per cent of the total perennial understorey plant cover is native'*. However, the site would appear to be exempt from requiring a planning permit for the removal of native vegetation because it is covered by exemption 2.24 Regrowth in '*Exemptions from requiring a planning permit to remove, destroy or lop native vegetation – Guidance*' because it is regrowth that is *'Native vegetation that is to be removed, destroyed or lopped that has naturally established or regenerated on land lawfully cleared of naturally established native vegetation, and is: – less than 10 years old*'.

The guidance describes that the primary purpose of the exemption is '*to not require a permit for the removal of native vegetation that has regrown in an area that has been lawfully cleared'. Land lawfully cleared includes clearing that was legal at the time it originally occurred, and the area has been periodically maintained as cleared land since then, including within the last 10 years*.' As noted and pictured in Appendix G, the site has been cleared and resown for pasture within the past 10 years and continuously managed as grazing land.

The Project is therefore considered exempt from requiring a planning permit for the removal of native vegetation to accommodate the BESS facility.

The required removal of vegetation for the Approved Project (as detailed in section 7.2.4 of Appendix A) remains in place and subject to the conditions of PA1900723.

Clause 53.13 – Renewable energy facility

The proposal warrants the need to address Clause 53.13, which relates to the proposed use or development of land associated with renewable energy facilities (except wind and geothermal energy extraction).

It is considered that the amendment supports the approved proposal and satisfactorily meets the application requirements, as addressed in Table 5.3.

Table 5.3: Clause 53.13 – Renewable Energy Facility provisions

Application Requirements	Response
A site and context analysis, including:	
A site plan, photographs or other techniques to accurately describe the site and the surrounding area.	Site plans are included in Appendix D, which includes the proposed infrastructure. The site and surrounding area have been described in Section 2.1 of this report.
A location plan showing the full site area, local electricity grid, access roads to the site and direction and distance to nearby accommodation, hospital or education centre.	A BESS module layout and grid connection map are included in Appendix D. A location map is shown in Figure 2.1 of this report.
A design response, including:	
Detailed plans of the proposed development including, the layout and height of the facility and associated building and works, materials, reflectivity, colour, lighting, landscaping, the electricity distribution starting point (where the electricity will enter the distribution system), access roads and parking areas.	Design plans and site layout for the BESS modules, and associated infrastructure are included in Appendix D.
Accurate visual simulations illustrating the development in the context of the	A Landscape and Visual Impact Assessment (LCVIA) has been included as part of this planning report (refer to Appendix I). It has

Application Requirements	Response
surrounding area and from key public view points.	been supported by photomontage imagery undertaken at three sensitive receptors or localities, and two viewpoints nearby to the area. It is concluded that due to the flat topography of the area, the solar farm results in low visual impact to its surroundings. Furthermore, vegetation screening may be implemented for screening, especially from public viewpoints such as road users of Traralgon-Maffra Road and Frasers Lane.
The extent of vegetation removal and a rehabilitation plan for the site.	Some native vegetation will need to be removed as part of the development, however is exempt from requiring a permit to remove and subsequent offsets, due to the age and nature of the vegetation (see section 5.2.4 and Appendix F). A Landscape Plan has been prepared for the solar farm which demonstrates that mitigation measures have been considered for this proposal. Where applicable and safe to do so (i.e. keeping bushfire protection in mind), landscaping provisions may additionally be applied to the BESS site to align with the solar farm.
Written report and assessment, including:	
An explanation of how the proposed design derives from and responds to the site analysis.	This planning assessment report is considered to satisfactorily address the proposal, the amenity impacts including visual and traffic, and how the proposal design responds to the site analysis. A desktop Aboriginal heritage assessment has been undertaken for the Project. The assessment reported that there have been no Aboriginal or historical cultural heritage items or sites have been previously recorded on the project site It is expected that there will be an increase in noise and vibration impacts during the construction phase of the project, resulting from normal operation of machinery and truck movements. Works will not be undertaken outside of standard hours unless approval has been sought from the relevant agencies. The operational noise impacts is expected to be minimal, due to the use of low noise-emitting infrastructure, and the nearest
A description of the proposal, including the types of process to be utilised, materials to be stored and the treatment of waste.	
Whether a Works Approval or Licence is required from the Environment Protection Authority.	
The potential amenity impacts such as noise, glint, light spill, emissions to air, land or water, vibration, smell and electromagnetic interference.	
The effect of traffic to be generated on roads.	
The impact upon Aboriginal or non-Aboriginal cultural heritage.	
The impact of the proposal on any species listed under the *Flora and Fauna Guarantee Act 1988* or *Environment Protection and Biodiversity Conservation Act 1999*.	

Application Requirements	Response
	residence located 600m away from the BESS facility.
A statement of why the site is suitable for a renewable energy facility including, a calculation of the greenhouse benefits.	A feasibility study was undertaken prior to the development approvals phase to determine the suitability of the site for the proposed solar farm development. The assessment determined that the site was suitable, based on factors including infrastructure and topography. A statement of the solar farm benefits is discussed in Section 2.6 of Appendix A. The siting of the BESS directly adjacent to the solar farm further supports the overall objectives of the approved project. The BESS' capability of storing and releasing accumulated solar power on demand further supports the provision of a renewable energy resource and limiting the use of other sources that emit greenhouse gases.
An environmental management plan including, a construction management plan, any rehabilitation and monitoring.	An environmental management plan for the solar farm is currently being prepared in line with the conditions outlined in PA1900723. The scope of this, and other associated plans, will be broadened to include the BESS facility as well as addressing any additional permit requirements, subject to approval of the amendment.

The proposal is also considered to be compliant with the decision guidelines for the Particular Provisions for Renewable Energy Facility, as listed under Clause 53.13. The relevant guidelines are discussed in Table 5.4.

Table 5.4: Clause 53.13 – decision guidelines for renewable energy facilities provisions

Decision Guidelines	Response
The effect of the proposal on the surrounding area in terms of noise, glint, light spill, vibration, smell and electromagnetic interference	Noise impacts during construction will be low. Construction activities will take place only during permitted hours of work in the daytime. There are no nearby airports or flight paths in the vicinity. A suitably-sized landscape buffer will be applied along the site boundaries to achieve visual impact mitigation. Electromagnetic interference is considered insignificant from the proposal development

Decision Guidelines	Response
	due to very low levels emitted from solar farms, BESS modules, and associated other assets. There are no vibration or smell impacts that is expected from the development of the solar farm.
The impact of the proposal on significant views, including visual corridors and sightlines.	A visual impact assessment has been included as part of this planning report. It has been supported by photomontage imagery undertaken at three receptors nearby to the area. It is concluded that due to the flat topography of the area, and the limited quantity of sensitive receptors, the solar farm results in low visual impact to its surroundings. Furthermore, vegetation screening may be implemented for screening, especially considering road users along Traralgon-Maffra Road.
The impact of the proposal on the natural environment and natural systems.	South Energy seeks to increase the benefits and sustainability of its projects. The proposed development is considered to provide landscape benefits through landscaping and management of the site during its operational phase.
Whether the proposal will require traffic management measures.	No specific traffic management is required for the development. There is minimal traffic movement during the construction and operational phases at the site.

5.3 Notification

Public notification of the Project will be determined by the relevant authority (DTP) on review of this amendment report. In addition, referral agencies must be consulted, and the responsible authority must take any comments into account when determining the matter.

5.4 Incorporated Documents

Clause 72.04 lists documents which are incorporated in, and therefore form part of the planning scheme. Relevant documents are discussed below.

5.4.1 Guidelines for the removal, destruction or lopping of native vegetation

The Native Vegetation Guidelines (DELWP, 2017) were prepared by the Victorian Government to assist in the assessment and offset for the removal, destruction or lopping of native vegetation. The guidelines are called in under Clause 52.17 of the planning scheme as an application requirement.

The guidelines outline:

- The assessment of impacts from removing native vegetation on biodiversity and other values.
- How offsets are calculated and established to compensate for the loss in biodiversity value from the removal of native vegetation.

The objective for permitted clearing of native vegetation is that there is no net loss in the contribution made by native vegetation to Victoria's biodiversity.

Although the Project is considered exempt from requiring a permit to remove native vegetation on site (refer section 5.2.4), these guidelines are still relevant as they are required to support the justification of the exemption.

6. Conclusion

This report has considered the relevant planning requirements to allow for a section 72 amendment to be applied the approved Frasers Solar Farm Project (PA1900723). The amendment will allow for an additional 5ha of land to be used to the southeast of the Approved Project site for the implementation of a BESS facility at 1205 Traralgon-Maffra Road, Glengarry North, Victoria. The intent of the BESS is to support the operation of the solar farm through storing excess solar power generated during peak times.

The amendment is considered to align with the existing approval and as such is consistent with the requirements of the Latrobe Planning Scheme including the Municipal Strategic Statement, Local Planning Policy Framework, and the relevant zone and overlay provisions.

The environmental risks identified as part of the amendment are considered to be easily managed. In most cases, they have already been considered as part of the Approved Project. It is expected that the already approved EMP, CEMP and other associated management plans (see section 2.4) will be revised following approval of the amendment, to account for the BESS facility, with additional provisions in place to ensure the safety of the facility. These additions will be accounted for prior to the commencement of BESS construction.

Key avoidance and minimisation measures that will be implemented for the site include:

- Avoiding the large dead tree identified in the northeast of the site;
- Using internal access via the solar farm to avoid removal of vegetation in the adjoining Traralgon-Maffra road reserve as well as limiting impacts on traffic flow along this key road;
- Constructing a 6m high acoustic wall to ensure noise levels on nearby sensitive receptors remain within the required limits at all times of the day; and
- Implementing measures to ensure surface water flow does not contribute to impacts from erosion on the site.

In addition to the conditions imposed on the Approved Project, these measures will ensure the site can be appropriately and effectively managed. As such, the proposed amendment is not expected to result in any additional adverse impacts on surrounding values or local amenity.

The Project is considered to comply with the relevant regulatory frameworks and accordingly should be recommended for approval.

Appendices

A Frasers Solar Farm Planning Report

B Certificate of Title

C Subdivision Planning Permit

D Concept plan

E Traffic impact assessment

F Noise impact assessment

G Natural values assessment

H Aboriginal and cultural heritage memo

I Landscape and visual impact assessment

J Hydrology assessment

K Bushfire risk management plan

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