Prepared by Hydro-Electric Corporation ABN 48 072 377 158
t/a Entura, Level 8, 530 Collins Street, Melbourne VIC 3000, Australia

Date: 26/02/2026

Technical memo

Project	South Energy Frasers BESS Development Approvals
Project reference	E312651 - P521998
Document number	ENTURA-1224546187-42
Subject	Native vegetation assessment

Revision history

Revision 1			
Revision description	FOR SUBMISSION		
Prepared by	Raymond Brereton	On file	23/3/2026
Reviewed by	David Procter	On file	23/3/2026
Approved by	Bunfu Yu	On file	23/3/2026

Introduction

Frasers Lane Development Pty Ltd, on behalf of South Energy, intends to lodge an amendment under Section 72 the *Planning and Environment Act 1987* for PA1900723 to include a Battery Energy Storage System (BESS) alongside the currently approved Frasers Solar Farm in Glengarry North, Victoria. The amended permit application will include an additional 25 ha parcel of land to the southeast of the solar farm (parcel: 125B\PP3627) for the development of the BESS. The BESS footprint is intended to occupy a 5 ha portion in the northeast corner of the of this parcel.

Entura has been contracted by South Energy to undertake an assessment of the natural values of the proposed BESS footprint including native vegetation as defined under Victoria Planning Provision – Clause 73-01 and flora and fauna species listed under the *Flora and Fauna Guarantee Act 1988* (Vic) FFG Act. The natural values assessment site is confined to the BESS footprint being the 5 ha portion of the land parcel where the BESS will be located.

Desktop review

A desktop review of the available information on NatureKit[1], which is an online mapping and data exploration tool for biodiversity data in Victoria, was used to identify potential Ecological Vegetation Communities (EVC's) and threatened flora and fauna species that may occur on the site. The online mapping tool did not identify any EVC's on the site although Plains Grassy Woodland/Gilgai Wetland

[1] https://www.environment.vic.gov.au/biodiversity/naturekit

Mosaic (EVC No. 259) is recorded along the road reserve to the east of the land parcel. This community is listed as Endangered in the Gippsland Plains bioregion.

A review of the Current wetlands map on the Native Vegetation Removal (NVR) Map found that there are no wetlands mapped within the site[2].

No threatened fauna species have been recorded on the site. The nearest threatened fauna record is an observation of a white-throated needletail (*Hirundapus caudacutus*) dated 05/12/1978 located 1.7 km to the north west of the site with a poor positional accuracy of +/-9 km. The white-throated needletail is listed as *Vulnerable* under the FFG Act and the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Similarly, no threatened flora species have been recorded on the site. The nearest threatened flora record is an observation of matted flax-lily (*Dianella amoena*) dated 08/12/2004 located 1.4 km to the east of the site. Matted flax-lily is listed as *Critically Endangered* under the FFG Act and *Endangered* under the EPBC Act.

There is also a record of giant honey-myrtle (*Melaleuca armillaris* subsp. *armillaris*) from the same location on the same date. Giant honey-myrtle is listed as *Endangered* under the FFG Act. This species is commonly grown in gardens, as a windbreak tree and a street tree and there are naturalised populations outside of its natural range. The location of this giant honey-myrtle record is identified as introduced on Vicflora[3] which is a comprehensive on-line guide to the wild plants of Victoria.

Native vegetation

A comprehensive walkover of the site was undertaken on the 5 and 6th of February 2026 and all flora species encountered were recorded as well as an estimate of percentage cover for each species. The complete flora list is provided in Table 1. The site is a paddock used for cattle grazing which has been resown to pasture within the last 10 years, in addition a composted soil conditioner was applied around 2020/2021 at a rate of approximately 10 tonnes per hectare. The paddock was dominated by the perennial pasture grass species *Agrostis capillaris* (brown-top bent), *Lolium perenne* (perennial ryegrass) and *Dactylis glomerata* (cocksfoot) which comprise up to 80% of the ground cover (Figure 1). Other perennial pasture grasses that were present included *Paspalum dilatatum* (paspalum), *Anthoxanthum odoratum* (sweet vernal) and *Setaria parviflora* (slender pigeon-grass). The only native perennial grass recorded was an isolated occurrence of the *Anthosachne scabra* (rough wheatgrass) which had a cover of less than 1% across the site. There was no evidence of the Plains Grassy Woodland/Gilgai Wetland Mosaic EVC on the site.

Introduced perennial herb species recorded on the site included *Hypochoeris radicata* (cats' ear), *Leontodon saxatilis* (hairy hawkbit), *Trifolium repens* (white clover), *Acetosella vulgaris* (sheep sorrel) and *Rumex crispus* (curled dock) which comprise up to 20% of the vegetation cover of the site. The dominant introduced herbs were *Hypochoeris radicata* and *Trifolium repens* which comprised up to 30% of the vegetation cover locally. The perennial introduced shrub *Rubus fruticosus* aggregate (blackberry)

[2] https://mapshare.vic.gov.au/nvr/removal

[3] https://vicflora.rbg.vic.gov.au/

was commonly present across the site and comprised approximately 5% cover. There was also one plant of *Rosa rubiginosa* (sweet briar) recorded within the site. Both these introduced shrubs are listed as Regionally Controlled Weeds in the East Gippsland Region. The introduced annual herbs *Cirsium vulgare* (spear thistle) and *Xanthium spinosum* (Bathurst burr) were recorded at the site and are also Regionally Controlled Weeds. Controlled weeds are introduced plants that are usually widespread in a region and ongoing control measures are required to prevent their spread. Landowners have a responsibility to take all reasonable steps to prevent the growth and spread of regionally controlled weeds on their land[4].

The graminoid *Juncus gregiflorus* (green rush) was common in an ephemeral drainage line that crossed the western boundary of the site from the northwest to the southeast (Figure 3). The drainage line is an unnamed minor tributary of Four Mile Creek which joins another unnamed tributary before joining Four Mile Creek approximately 2 km southeast of the site. The cover of *Juncus gregiflorus* within drainage line varied from 30% or more at the northwestern end to 15% at the southeastern extent on the site (Figure 2, Figure 3). There were also occasional occurrences of *Juncus procerus* (tall rush) within the drainage line.

There is one large dead tree located in the northeastern corner of the site (Figure 2). The dead tree had a height of approximately 7 m and diameter at breast height (DBH) of 153 cm which meets the criteria for a large tree because it has a DBH of 40 centimetres or more and it is taller than 3 metres (*Guidelines for the removal, destruction or lopping of native vegetation, Version 1.1*).

Figure 1: View of site showing dominance of pasture species

[4] https://agriculture.vic.gov.au/biosecurity/weeds/invasive-plant-classifications

Figure 2: Map of vegetation at the site

Figure 3: View of ephemeral drainage line with *Juncus gregiflorus*

Figure 4: large dead tree on the site

Native vegetation assessment and recommendations

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*[5]. 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*'. As noted above the paddock has been resown to pasture in the last ten years and has been continuously managed as grazing land for cattle.

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*.' The land in question has been cleared historically for grazing and used for grazing within the last 10 years.

There is a large dead tree located in the northeastern corner of the site proposed BESS site which meets the definition of a large scattered tree[5]. The extent of a large scattered tree (dead or alive) is the area of a circle with a 15 metre radius (with the trunk at the centre of the circle) in hectares which for the single dead tree would equate to 0.07 ha. However, it is understood that this tree, including its 0.07 ha extent as a large scattered tree, will be retained. The closest proposed BESS infrastructure to the dead tree is an access road approximately 35 m to the southwest.

[5] https://www.environment.vic.gov.au/__data/assets/pdf_file/0021/91146/Guidelines-for-the-removal,-destruction-or-lopping-of-native-vegetation,-2017.pdf

Table 1: Flora species recorded from the BESS site (5/2/2026)

Key: i – introduced, C - Regionally Controlled Weed[6]

Species name	Common name	Status
DICOTYLEDON		
Asteraceae		
Cirsium vulgare	Spearthistle	i, C
Erigeron sumatrensis	Flaxleaf fleabane	i
Hypochoeris radicata	Cats' ear	i
Leontodon saxatilis	Hairy hawkbit	i
Lotus subbiflorus	Birdsfoot-trefoil	i
Sonchus asper	Prickly sowthistle	i
Xanthium spinosum	Bathurst burr	i, C
Fabaceae		
Trifolium repens	White clover	i
Trifolium subterraneum	Subterranean clover	i
Gentianaceae		
Centaurium erythraea	Common centaury	i
Malvaceae		
Malva nicaeensis	Mallow of Nice	i
Plantaginaceae		
Plantago lanceolata	Ribwort plantain	i
Polygonaceae		
Acetosella vulgaris	Sheep sorrel	i
Polygonum aviculare	Hogweed	i
Rumex crispus	Curled dock	i
Rosaceae		
Rosa rubiginosa	Sweet briar	i, C
Rubiaceae		
Rubus fruticosus aggregate	Blackberry	i, C
Solanaceae		
Solanum nigrum	Black nightshade	i
MONOCOTYLEDON		

Species name	Common name	Status
Juncaceae		
Juncus procerus	Tall rush	
Juncus gregiflorus	Green rush	
Poaceae		
Agrostis capillaris	Brown-top bent	i
Anthosachne scabra	Rough wheatgrass	
Anthoxanthum odoratum	Sweet vernal	i
Bromus catharticus	Prairie grass	i
Dactylis glomerata	Cocksfoot	i
Lolium perenne	Perennial ryegrass	i
Paspalum dilatatum	Paspalum	i
Setaria parviflora	Slender pigeon-grass	i
Vulpia myuros	Rats-tail fescue	i