MORTLAKE ENERGY HUB

Environmental Management Plan Framework

Prepared for
BRIGHTNIGHT POWER
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URBIS

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We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.

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PROJECT DESCRIPTION

1.1. OVERVIEW OF PROJECT

The following Environmental Management Plan Framework (**EMPF**) has been prepared for the Mortlake Energy Hub (**the Project**) by Urbis Ltd, on behalf of BrightNight Power.

It is noted that given the early stage of the development process, this plan is a framework only and is subject to change. Further details will be provided following issue of a planning permit and confirmation with the construction team on the final detail of the Environmental Management Plan. This is expected to be addressed via condition on the Planning Permit.

The Project comprises of an area of 1,900ha, with approximately 1060 ha of panel area, at Moyne Shire Council, approximately 3km north-west of the town of Mortlake. The proposed development will comprise a 360MW solar farm, a 33kV transmission line extension and a 600MW Battery Energy Storage System (BESS) that will contribute significantly to Victoria's renewable energy generation targets of 50% by 2030 and the reduction of greenhouse gas emissions (legislated to achieve net zero by 2050).

1.2. SUBJECT SITE

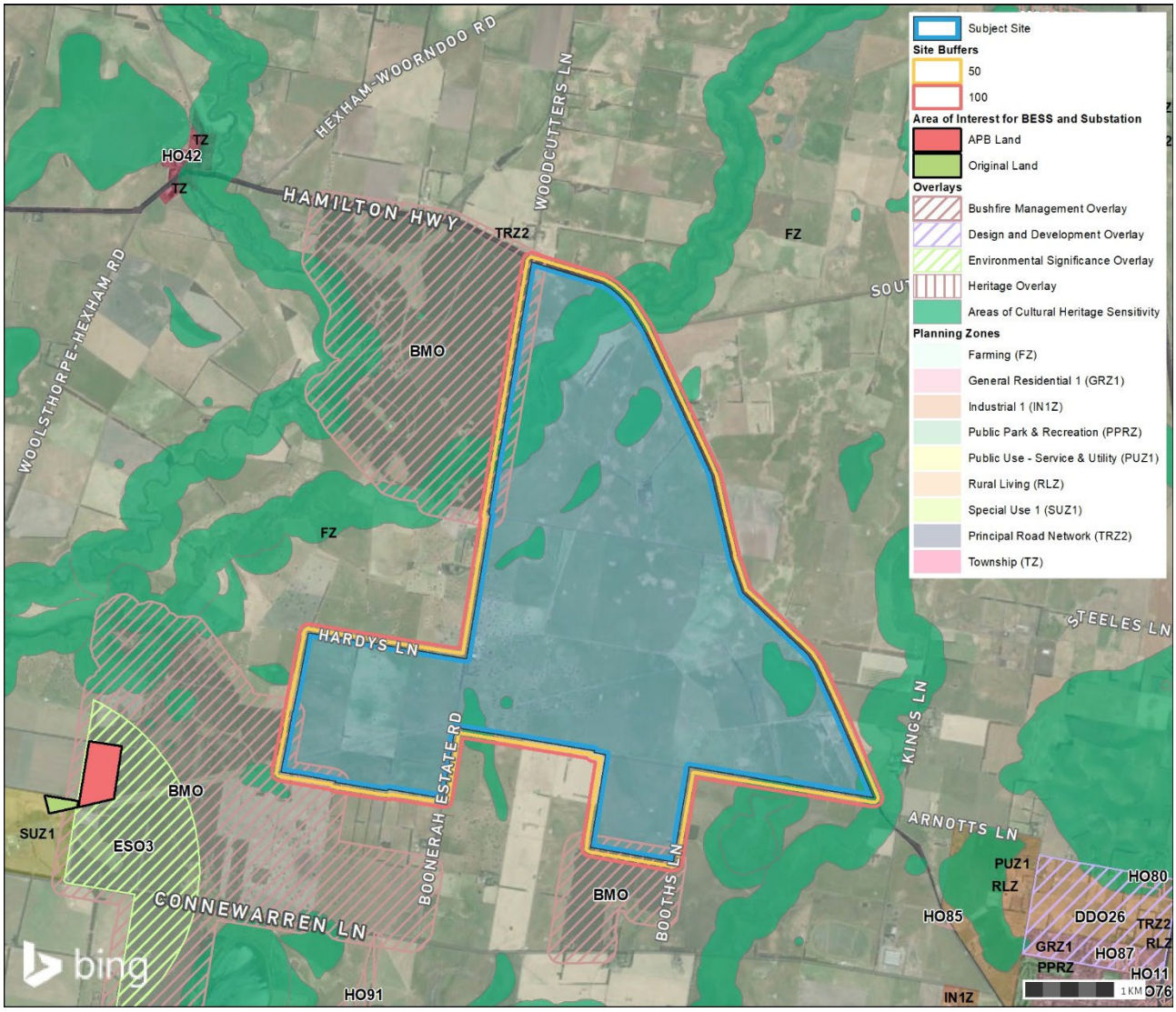
The subject site consists primarily of agricultural land and associated dwellings, as well as various outbuildings located on parts of the site. The site is covered primarily with improved pasture, with patches of native vegetation and scattered trees. The subject site sits entirely within Farming Zone (FZ) (**Figure 1**).

Salt Creek runs through the northern part of the site and the Boonerah Estate Road separates the northern part of the site from the south. High voltage powerlines cut across the site from east to west.

To the north-east is the Hamilton Highway, a declared highway providing a single lane of vehicle traffic in each direction (north-west / south-east). Beyond the Hamilton Highway is an extensive agricultural area, consisting primarily of grazing and cropping land, with dwellings scattered throughout. To the west is an extensive wooded area, and an area of agricultural land with scattered trees.

To the south is an agricultural area used for cropping. Within this area, dwellings are located at 570 Connewarren Lane and at 640 Boonerah Estate Road. Also to the south is the Mortlake Common Flora Reserve, a native grassland reserve. A dwelling is also located in this area at 35 Thulborns Lane, Mortlake.

Figure 1 Subject Site



1.3. SCOPE OF WORK

1.3.1. Construction and Operation Details

Given the early stage of the development process (at permit application stage), the following details are estimates only. It is noted that further updates will be made once this information is finalised.

Construction

- Approximately 300 workers during peak construction period
- Approximately 18-24 months construction period
  - Site Set-Up - two months
  - Civil works (access track and hardstand construction) - three months
  - Component Delivery and Installation - nine months
  - Substation Delivery and Installation - four months
  - Testing - three months
- There will likely be some overlap between the above stages. A total of 18 to 24 months from initial construction to commencement of commercial operations is anticipated with construction commencing in late 2024.

- It is anticipated that there will be a maximum of approximately 167 construction related vehicles per day during peak construction, and up to 53 construction related vehicle movements during the site peak hour (start and end of work day).

Operation

- Up to 10 to 20 full time employees for maintenance.

1.3.2. Decommissioning

At the conclusion of the Project's operational life, the Project site will be reinstated to its previous use, including the removal of all buildings and infrastructure.

The expected operational life of the Project is approximately 35 years and is anticipated to commence in 2026. Council and DTP will be notified within two (2) months of the solar farm permanently ceasing operation.

Following permanent cease of operation, all infrastructure, equipment, buildings, structures and works must be removed, and the site or the relevant part of the site must be rehabilitated and reinstated to the condition it was in prior to the commencement of development to allow it to be used for agricultural purposes (or any proposed alternative use). This includes, but is not limited to, all solar panels, power conversion units, operations and maintenance facility, control building, substation, switchyard, and above and below ground electrical infrastructure and equipment. Written consent of the responsible authority will be sought for the retention of any items of infrastructure or other works (such as access tracks or the control building) that are suitable for the ongoing agricultural use of the land (or proposed alternative use).

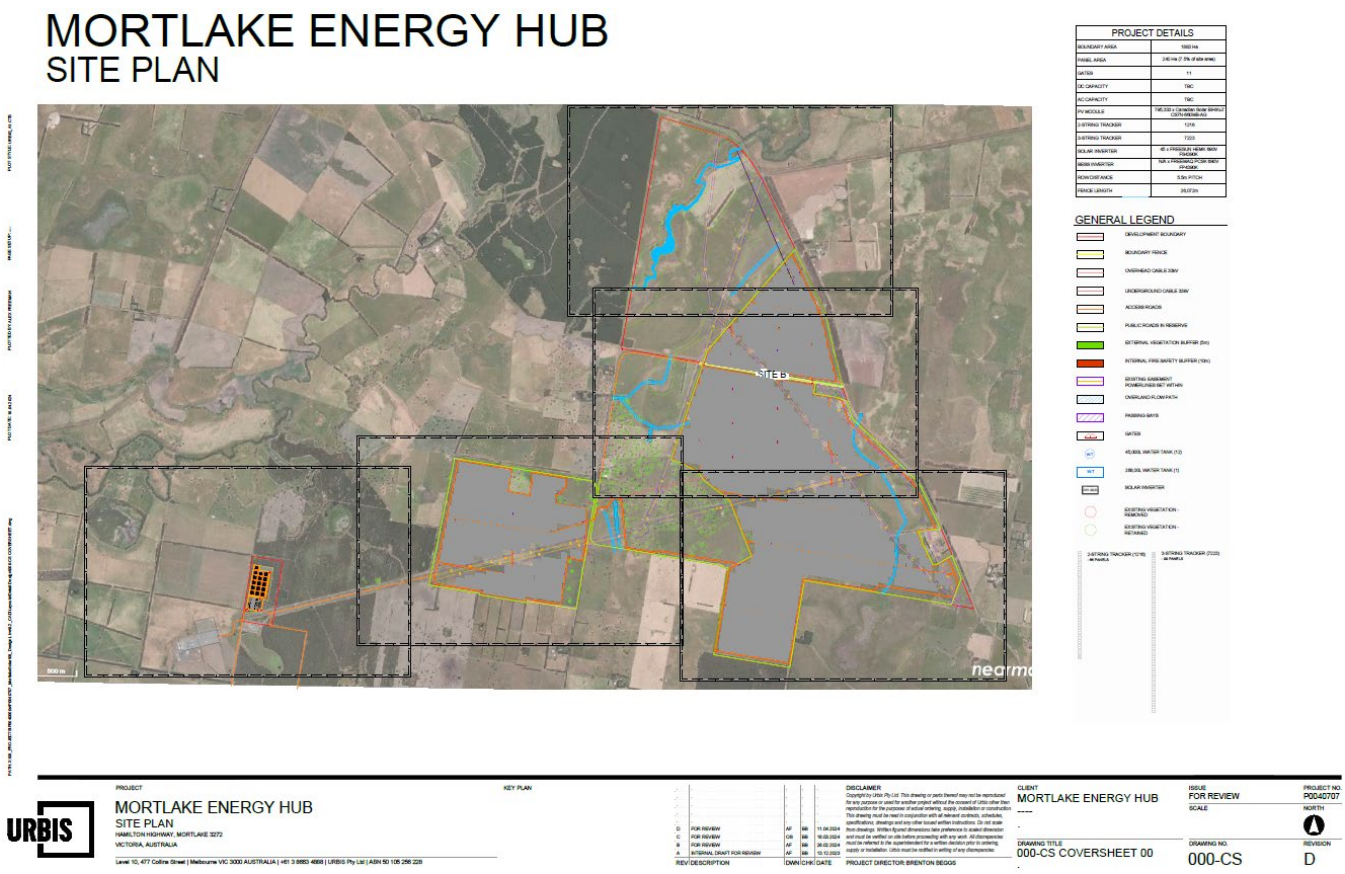
Within approximately three months of the solar energy facility permanently ceasing operation, a Decommissioning Management Plan (DMP) will be prepared by a suitably qualified and experienced person and will be submitted to, approved and endorsed by the responsible authority. The DMP will include, as a minimum:

- Identification of infrastructure, equipment, buildings and structures to be removed, and details of how these will be removed.
- Details of how the site will be rehabilitated.
- A Decommissioning Traffic Management Plan (DTMP), which will be submitted to, approved and endorsed by the responsible authority prior to decommissioning works starting. The DTMP must be approved by the relevant road management authority (or authorities) prior to submission to the responsible authority for endorsement. The DTMP must specify measures to manage traffic impacts associated with removing the infrastructure, equipment, buildings and structures from the site, to the satisfaction of the responsible authority.
- Details on how all infrastructure, plant, equipment and access tracks that are no longer required for the on-going use or decommissioning of the facility will be removed.
- Details on how any waste generation during decommissioning activities will be managed.
- Detailed measures to manage risk to the environment and human health associated to decommissioning activities, if required.
- Details on how the site, or the relevant part of the site, will be reinstated to the condition it was in prior to the commencement of development.
- Identify any other post-activity land uses, if necessary.
- A commitment that all decommissioning works identified in the DMP be completed to the satisfaction of the responsible authority as soon as practicable, but no later than approximately 12 months after the DMP is endorsed, or such other period approved by the responsible authority.
- Any other detailed measure to comply with any other relevant condition of the licence as required.

1.4. SITE PLAN

The site plan submitted as part of the Permit Application is title Site Plan – Mortlake Energy Hub under Appendix B within the Application (Figure 2).

Figure 2 Mortlake Energy Hub Site Plan



1.5. TIMING OF WORKS

Works are expected to be conducted over five stages and are anticipated to commence in late 2024. These stages and anticipated times are listed below:

- Stage 1: Site set up – two months.
- Stage 2: Civil works for access track and hardstand construction – three months.
- Stage 3: Component delivery and installation – nine months.
- Stage 4: Substation delivery and installation – four months.
- Stage 5: Commissioning (Hold Point testing) – three months

There will be some overlap between the above stages.

Work will be undertaken during 7:00am to 6:00pm Monday to Friday and 8:00am to 1:00pm on Saturdays. No work is proposed to be carried out on Sundays or Public Holidays. Timing of works will adjust to weather conditions and appropriate measures will be taken in accord to severe weather events, such as peak bushfire season, when required (Table 1).

Table 1 Weather Averages from Mortlake Racecourse (dated 23rd February 2024)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Mean High (°C)	26.2	26.2	23.9	20.0	16.2	13.6	13.1	13.9	15.9	18.2	20.9	23.6
Mean Low (°C)	11.2	11.6	10.0	8.0	6.6	5.0	4.6	4.8	5.7	6.5	8.1	9.4
Mean Rain (mm)	36.7	32.1	32.5	44.1	57.6	54.9	61.4	65.3	57.9	56.2	49.2	40.2

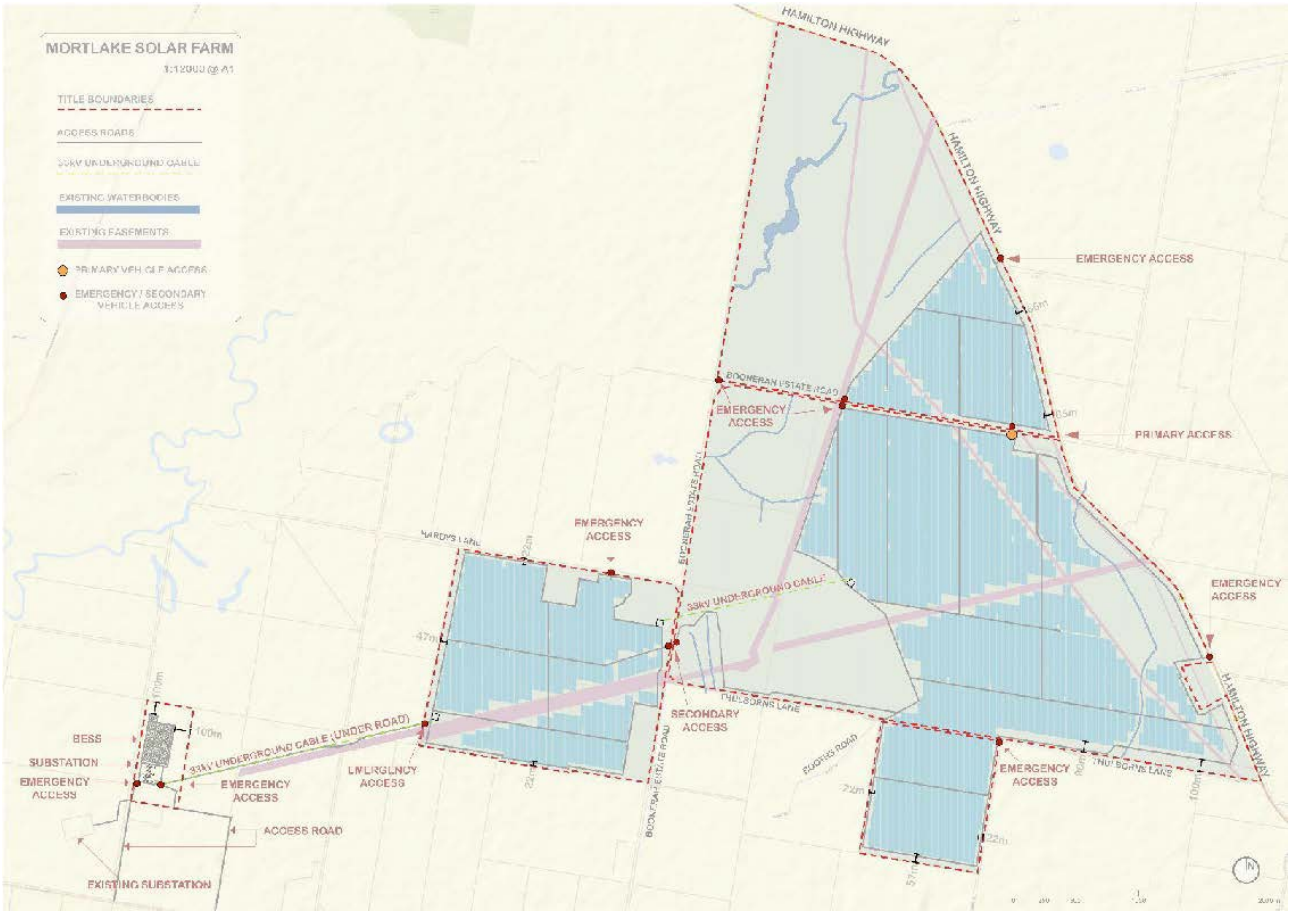
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Mean number of days of rain ≥ 1 mm	4.2	3.7	5.7	7.0	9.8	10.2	12.2	12.6	10.9	9.5	6.7	6.1

1.6. SITE ACCESS

The primary access points to the site will be via Boonerah Estate Road via an upgraded road and intersection treatment at the Hamilton Highway / Boonerah Estate Road intersection. Secondary access to the site will be via Thulborns Lane. Access to the proposed BESS will be via Connewarren Lane.

The aforementioned vehicle access points are shown in **Figure 3**.

Figure 3 Vehicle Access Points



Source: Urbis

1.7. DILAPIDATION SURVEY

Before works commence, the EPC contractor will prepare a dilapidation survey including a written report and photos of any existing damage to public infrastructure, which will be submitted to Moyne Shire Council. The condition of table drains, gravel road surfaces, seals, signs and other public infrastructure fronting the property and abutting at least two properties either side of the development will be included.

PROJECT ROLES & CONTACTS

The following section outline the likely project roles and key accountabilities during the lifecycle of the project. In addition, the Project Team assigned to the project construction and operation by BrightNight Power as the Applicant would also be responsible and accountable for the following actions:

- Prepare and submit the EMP and other relevant management plans and strategies required under the Planning Permit and conditions of consent and submit (as required) to the responsible authority for approval.
- Engage suitably qualified personnel to manage each phase of the development.
- Maintain website and communication channels including email, postal address, and phone line.
- Notify Council and DTP of commencement and finalisation of construction.
- Notify Council and DTP, and any other relevant agency, of an incident or non-compliance.
- Identify if an amendment to the Planning Permit is required.
- Review internal environmental audit report and ensure performance is maintained.
- Where necessary, revise this EMP and other management plans and submit amendments (as required) for approval to the relevant authority.

1.8. CONSTRUCTION

1.8.1. Project Manager

The appointed Project Manager will have overall responsibility and accountability for environmental performance on the project. The Projector Manager is responsible for ensuring consistency with the relevant legislative standards of Australia, including the applicable Australian Standards, along with contractual obligations.

The Project Manager also has further responsibility to procure provision of appropriate resources to ensure the effective implementation of this EMP. The Project Manager is also responsible for ensuring the compliance with Planning Permits as set out in the EPC Contract, reviewing internal audit reports and notifying Council, DTP and any other relevant agency of commencement of construction, incident reporting and non-compliance.

1.8.2. Construction Site Manager

Reporting to the Project Manager, the appointed Site Manager will be accountable for the construction project team and contractors in respect to environmental performance on site through:

- Maintain a working knowledge of the management system and environmental management plans and monitor compliance for the requirements of this EMP.
- Coordinate incident response, including ensuring incident investigation is undertaken and corrective actions carried out.
- Ensure relevant training and qualifications are completed by personnel and maintain induction records.
- Ensure that communication and reporting systems are established and maintained during the development of the project.
- Ensure that complaints are received, registered, and responded to in a proper manner as per the Community Notification Strategy.
- Participate in Environmental Auditing and implement recommendations and corrective actions.

1.8.3. Health, Safety and Environment (HSE) Coordinator

The appointed Project EHS (Environmental Health and Safety) Advisor will report to the Site Manager. The HSE Advisor will perform a key role in the implementation, maintenance, and monitoring of compliance to

this EMP, of categorical importance for the health and safety of the employees on site during the construction lifecycle. Their main responsibilities are:

- Maintain a working knowledge of the environmental management system, environmental management plans, and be aware of all environmental legislative requirements.
- Maintain working knowledge of environmental risks and impacts of the development and measures required to be put in place.
- Undertake an HSE Risk Assessment for the development.
- Carry out site inspections and maintain monitoring of environmental performance.
- Develop a Corrective Action Register.
- Maintain records of compliance with the development consent and management plans.
- Maintain Complaints Register and respond to complaints or nominate a delegate to respond.
- Monitor the Complaints Register weekly to identify any trends in complaints.
- Investigate incidents and identify preventative actions.
- Prepare incident report and implement corrective actions.
- Participate in Independent Environmental Audits and implement recommendations.

1.8.4. EPC Contractors and Sub-contractors

- Undertake works in compliance with the EMP, other management plans and strategies.
- Complete required training and attend toolbox talks where relevant.
- Notify EPC Site Manager of any non-compliance or incidents.
- All personnel are responsible for undertaking activities in accordance with this EMP framework.

1.9. OPERATION

Due to the nature of the passive operation of the solar farm, significantly less environmentally sensitive activities are expected compared to the construction phase. Nevertheless, the operational phase of the project is still subject to the requirements of this EMP framework, and all operational personnel will be responsible for undertaking all the activities in accordance with it.

1.9.1. Operation and Maintenance Site Manager

- Ensure compliance with Integrated Management System of the company.
- Ensure this EMP and other management plans are implemented.
- Review and update the EMP and other management plans as required.
- Carry out site inspections and environmental monitoring.
- Maintain complaints register and respond to complaints.
- Manage incident response.
- Investigate incidents and identify preventative actions.
- Notify the company management of incidents and non-compliances.
- Participate in Independent Environmental Audit and implement recommendations.
- Responsible for overseeing HSE management of the operation activities.

1.9.2. Operation and Maintenance Contractors

- Operating in compliance with the EMP and other management plans and the conditions of the Planning Permit.
- Notifying the Site Manager of any non-compliance and incidents.

1.10. PROJECT CONTACTS

Once appointed, the following table will provide the contact information for key personnel involved in the lifecycle of the project and is an integral part of the EMP compliance, monitoring and reporting. Key personnel are to be appointed following issue of the planning permit. Concrete details will be provided as part of the EMP prior to the commencement of the project.

Table 2 Project Roles & Contacts

Project Role	Name	Company	Contact Details
Project Manager			
EPC Project Manager			
EPC Site Manager			
EPC HSE Coordinator			
O&M Site Manager			

Table 3 is to be populated by BrightNight Power following contract award and project resourcing prior to construction commencing and notification will be issued to DTP, Council and all relevant parties.

ENVIRONMENTAL STRATEGY

1.11. SUMMARY OF STATUTORY LEGISLATION

The following table outlines the relevant State and Commonwealth legislation relevant to this EMP and associated management plans.

Legislation	Details
Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)	Works to progress in accordance with requirements in order to avoid impacts on Matters of National Environmental Significance (MNES). The project is highly unlikely to impact on any MNES and thus an EPBC referral is not required.
Environment Effects Act 1978	Requires certain public works to have an environmental impact assessment carried out before proceeding. The Project does not trigger the need for an EES Referral.
Planning and Environment Act 1987	Legislation under which the Project permit would be issued if approved.
Flora and Fauna Guarantee Act 1988	Key piece of Victorian legislation for the conservation of threatened species and communities and for the management of potentially threatening processes. Works to progress in accordance with biodiversity requirements in order to avoid unauthorised impacts on these matters.
Wildlife Act 1975	Framework for members of the community wishing to control, possess, display, breed, trade-in or interact with wildlife. An Authority to Control Wildlife (ATCW) authorisation will be required.
Aboriginal Heritage Act 2006	A chance finds protocol has been prepared to outline obligations under this Act.
Heritage Act 2017	A chance finds protocol has been prepared to outline obligations under this Act.
Environment Protection Act 2017	The Act defines how the Environment Protection Authority Victoria (EPA) works as an independent statutory authority. Subordinate legislation such as regulations sit under this Act.

1.12. COMMUNCATIONS, REPORTING AND RESPONDING TO ENVIRONMENTAL COMPLAINTS

Premier Strategy has been engaged to undertake consultation (on behalf of BrightNight Power) with Council, relevant agencies and the local community including affected surrounding landowners.

Premier Strategy informed adjacent property owners of scope of works, possible impacts and main mitigation measures. Further consultation by DTP will be undertaken via the public notice of the Planning Permit application. Ongoing matters raised by stakeholders will be assessed and responded to, as required.

BrightNight Power will continue to keep direct neighbours, stakeholders and the community informed of the project approval process and pre-construction, construction, and operation phases by:

- Continuing to engage with the community about the project, its impacts, and the approval process.
- Providing information through a letterbox drop on how the community's views have been addressed.
- Enabling the community to seek clarification about the project through the two-way communication channels.

When the final EMP is approved, a complaints website and phone line will be enabled to receive any feedback from the local community if any environmental concerns are raised regarding construction or operational phases. All received complaints will be recorded to analyse possible non-compliance and will be responded to, if possible, with mitigation actions to address any possible environmental and/or community impact.

1.13. MONITORING AND AUDITING

It is anticipated that a system of daily walkthrough inspections formulated for the Project will be undertaken by the responsible person from each contractor. The Site Manager would also participate routinely in walkthrough inspections, at least weekly.

This shall ensure daily visual inspections of all construction activities and work areas are conducted to monitor compliance with this EMP framework regarding operations, emergency, and risk management.

Environmental monitoring requirements are to be established prior to and during construction and during operation of the Solar Farm to include:

- Acoustic assessment to comply with operational noise criteria in accordance with *Part 2: Noise limits – Rural area method of EPA Publication 1826.4*.
- Cultural heritage finds.
- Dust generation monitoring.
- Water quality monitoring.
- Any other matters identified in the EMP.

1.14. ENVIRONMENTAL AWARANESS TRAINING

Project Managers and Project Contractors shall be responsible for ensuring that all Project personnel under their control receive both initial and ongoing environmental awareness training to ensure they are familiar with their environmental responsibilities under the EMP.

Project induction will provide all new site employees with an overview of the Project environmental management system and key aspects of the EMP prior to allowing access to the worksite. In addition, each individual contractor shall be required to provide all new employees with environmental induction training which addresses their own Integrated Management System and which at a minimum detail:

- Individual responsibilities under the plan.
- Risk management strategies for assessing potential environmental impacts and for developing appropriate management or control strategies for any activity perceived to pose an environmental risk.
- Key environmental concerns and associated control strategies.
- How hazardous or dangerous goods will be handled.
- Waste minimisation, recycling, and disposal guidelines.
- Incident and emergency response actions including reporting and recording guidelines.
- Complaint handling procedures.

The Induction Training program will be provided to the company's Project Manager for adequacy review prior to inductions taking place.

Project managers, contractors and the HSE Coordinator shall conduct ongoing environmental awareness training for key issues throughout the Project using targeted presentations at daily job pre-starts, toolbox meetings etc, and the use of targeted literature.

Project managers and contractors shall maintain a register of all environmental training provided which records the nature of the training, dates, the names of persons trained, and trainer details as well as any refresher training, if required, after any incident or non-compliance.

1.15. INCIDENT REPORTING

All employees will be required to report environmental incidents. A computerised database should be used for the reporting and recording of these incidents. All employees should have access to the system either directly or through their supervisor. The report would cover what happened, what was done immediately to rectify or control the situation, and corrective actions to be undertaken to prevent the recurrence of the incident.

All environmental incidents shall be investigated to determine the cause and the actions to be taken. Investigations are undertaken as per the procedure, and environmental incidents and corrective actions are reviewed at team meetings.

Throughout the lifecycle of the project, the EPC Site Manager and O&M Site Manager are responsible, during their respective project stages, for reporting any incident which causes or threatens to cause direct environmental harm or through the cumulative impacts and its interaction with previous existing conditions to Council, DTP or any other relevant agency.

1.16. ANNUAL REPORTING

Within 12 months of the approval and annually thereafter an Annual Environmental Management Report is to be submitted to DTP. The report must address the matters required by the project approval plus the matters identified below.

The annual report should additionally address the following matters:

- Identify the standards and performance measures that apply to the project.
- Describe the works carried out in the last 12 months.
- Describe the works that will be carried out in the next 12 months.
- Include a summary of the complaints received during the past year and compare this to the complaints received in previous years (if any).
- Include a summary of the monitoring results for the project during the past year.
- Include an analysis of these monitoring results against the relevant:
  - Impact assessment criteria/limits.
  - Monitoring results from previous years as per relevant management plans.
- Identify any trends in the monitoring results over the life of the project.
- Identify any non-compliance during the previous year.
- Describe what actions were, or are being, taken to ensure compliance.

ENVIRONMENTAL RISK MANAGEMENT

1.17. AIR QUALITY

Objectives

The main objectives of this section of the EMP framework are to comply with Air Quality criterion, specifically dust risk criteria as per EPA legislation, and to perform the development in a manner that minimises dust generation, which could pose a health risk, and prevent dust affecting adjoining dwellings.

Management Strategies and Controls

To minimise impacts and potential emissions from vehicles, equipment or dust generation form work, the following mitigation measures are proposed:

- All equipment is to comply with EPA 1897 measures for machinery hygiene to reduce dust risk.
- All machinery is to be maintained and be in good working order.
- Vehicles and equipment are to be inspected prior to use daily.
- Set appropriate and site-specific speed limits to minimise generating dust.
- Unsealed roads are to be sealed or at a minimum covered with gravel, as soon as practicable.
- Truck loads are to be covered upon entering and exiting the site.
- Water tankers are to be used to control dust where required.
- Avoid dry sweeping of large areas.
- Rehabilitation and stabilisation through vegetation of surfaces left unsealed after the completion of works.
- Truck wheel washes or other dust removal measures to be adopted. However, if a large volume of wastewater is being generated, it should be treated as ‘waste’ and managed in line with the waste hierarchy, preferably capturing and reusing the waster for wetting exposed areas, if possible.
- Stockpiles to be covered or grass seeded if left unused for an extended period, as per EPA 1895.

Monitoring would be undertaken by visual observations where construction activities could generate fugitive dust emissions such as stockpiles, unsealed roads and any excavation and filling activities. The requirement for dust monitoring may be reviewed if complaints are received.

1.18. BIODIVERSITY

Objectives

The main objectives of this section of the EMP framework are to ensure protection of native vegetation related to the planning permit and limit impacts where possible. Four plant species considered noxious weeds within the *Catchment and Land Protection Act 1994* were recorded in the study area and as such mitigation measures to avoid their propagation are also proposed. This section also relates to the landscape plan, to ensure management measures for newly planted vegetation.

Management Strategies and Controls

Subject to the final approval, it is anticipated that the following strategies and controls will be undertaken, as required:

- Before work begins, all personnel undertaking works relating to, or potentially impacting flora and fauna will be made aware of all relevant permit conditions and associated statutory requirements or approvals.
- In accordance with AS4970-2009, before any works start, including removal of native vegetation, temporary fences will be installed around areas of retained native vegetation to protect them from any accidental impacts. The fencing will be constructed of star pickets and plain wire, strong webbing, or other clearly visible and durable materials.

- Pre-construction site assessment to confirm that vegetation and trees to be retained have been adequately protected from impact.
- Where possible, construction stockpiles, machinery, internal roads, and other infrastructure should be placed away from areas supporting retained native vegetation.
- Removal of any habitat trees or shrubs (particularly hollow-bearing trees or trees/shrubs with nests) should be preferably undertaken between February and September to avoid the breeding season for most fauna species. If any habitat trees or shrubs are proposed to be removed, this should be undertaken under the supervision of an appropriately qualified zoologist to salvage and translocate any displaced fauna.
- Implementation of Tree Protection Zones (TPZs) to prevent indirect losses of native vegetation during construction activities in the West Lake Hub.
- Where suitable, salvage tree hollows of hollow bearing trees to be lost. Where possible introduce habitat into areas to be retained. Salvaged hollows could be attached to trees to mitigate impacts to arboreal fauna or birds, or placed in the understorey to provide habitat for ground dwelling fauna.
- As indigenous flora provides valuable habitat for indigenous fauna, it is recommended that any landscape plantings that are undertaken as part of the proposed works are conducted using indigenous species sourced from a local provenance.
- Where possible, supplement the loss of hollows from the removed large trees by placing nesting boxes in the retained scattered trees where appropriate.
- All construction personnel should be aware of ecologically sensitive areas to minimise the likelihood of inadvertent disturbance to areas marked for retention. Native vegetation (areas of sensitivity) should be included as a mapping overlay on any construction plans.
- Undertaking pre-clearing inspections by a suitably qualified zoologist or wildlife handler to confirm the on-site location of fauna immediately prior to habitat removal.
- If any native wildlife is found injured or stressed at the worksite, then the site supervisor should contact WIRES 1300 094 737.
- Ensure that vehicle wheels and machinery entering the site do not carry weed plant material or seeds.
- Ensure that areas with declared noxious weeds are properly cleared and treated where possible, avoiding accidental propagation of seedlings.
- Limit noise disturbance in proximity to the minor Grey-headed Flying Fox Camp. Where possible time loud construction events outside of the period of October to December when the majority of Grey-headed Flying Fox births occur.
- Construction should avoid sediment deposits and other hydrological impacts. Monitoring during construction should be undertaken and the implementation of sediment traps or other erosion control measures could be proposed if deemed necessary during peak construction months.
- Night lighting shall be restricted to the minimum amount required to safely operate the site to minimise light pollution and adverse effects on nocturnal species such as bats. This will include using:
  - light shields to direct light and reduce light spill.
  - low beam vehicle lights except where safety is compromised.

1.19. FIRE AND HAZARDS

Objectives

The main objectives of this section of the EMP framework are to recommend measures to mitigate and respond to bushfires and on-site fire events complying with Country Fire Authority Guidelines 2023.

Management Strategies and Controls

Subject to the final approval and input from the CFA, it is anticipated that the following strategies and controls will be undertaken, as required:

- The Emergency Management Plan must be adhered to Preliminary Bushfire Risk Assessment and regard given to the CFA's Guideline for Renewable Energy Installations.
- Fire breaks, APZ and site access routes to be constructed and maintained for the facility prior to infrastructure installation and any other construction works.
- All plant, vehicles and earth moving machinery to be kept clean of any accumulated flammable material (e.g. soil and vegetation).
- All operations involving earth moving equipment, vehicles, slashers, hot works (e.g. grinders, welders) and any other works with potential to generate ignitions, to cease while the FDR is forecast to be Extreme or greater and / or a Total Fire Ban is declared, unless they are undertaken in an area free of combustible materials.
- Controls are put in place to avoid or minimise the risk of other anthropogenic ignition sources such as from cigarettes, cooking fires, vehicles.
- All vehicles should contain a fire extinguisher and all activities with ignition risk potential should have a fire extinguisher readily available nearby and someone trained in how to use it.
- The handling and storage of flammable goods is undertaken in accordance with AS1940-2017.
- Promote awareness amongst employees, contactors and other site visitors to prevent all potential fire ignitions within the subject site and especially on days of elevated fire danger (i.e. High FDR or above).
- All construction activities to cease and no persons to be onsite on days of Catastrophic FDR.
- Vegetative fuels throughout the solar farm site be maintained in a minimal condition by grazing, slashing, mowing or herbicide treatment. Where fuel management is not possible under the PV panels, other lower risk ground cover should be considered e.g. mineral earth, gravel or non-curing ground cover vegetation.

1.20. HERITAGE

Objectives

The main objectives of this section of the EMP framework are to implement measures regarding unexpected heritage items being encountered and ensuring they are managed appropriately to protect their historical significance.

Management Strategies and Controls

Subject to the final approval, it is anticipated that the following strategies and controls will be undertaken, as required.

- Cultural awareness training session for all site contractors and sub-contractors prior the commencement of works.
- Site Chance Finding Protocol to be followed for the appropriate management and collection of historical objects or archaeological deposits if found on site.
- Scarred Tree #1 (ST1) as mapped and surveyed by ELA in December 2023 should have a protective buffer as guided by the voluntary CHMP.
- Any other voluntary CHMP measures.

1.21. NOISE & VIBRATION

Objectives

The main objectives of this section of the EMP framework are to take all necessary steps to ensure that no noise or other disturbance during construction or operation impact detrimentally to the amenity of adjoining receivers and to comply with relevant statutory requirements to noise limits.

Management Strategies and Controls

- Project noise limits must be kept in accordance with EPA 1826

Table 3 Applicable Project Noise Limits

Periods (as defined in EPA 1826)		dB level limit
Day	7:00-18:00 Monday-Saturday	49dB
Evening	18:00-22:00 Monday-Saturday 7:00-22:00 Sundays and public holidays	40dB
Night	22:00-7:00 All days	34dB

- Construction work will be undertaken, when scheduled, during 7:00am to 6:00pm Monday to Saturday. No work will be carried out on Sundays or Public Holidays unless separate approvals have been obtained.
- Within the first year of operational life after construction, a Post-Construction Acoustic Assessment will be prepared and submitted to the responsible authority.
- Consideration will be given during selection of equipment with a lower sound power level where possible.

1.22. SOIL AND WATER

Objectives

The main objectives of this section of the EMP framework are to outline measures to manage potential flood, surface water quality and stormwater run-off impacts, enable appropriate site drainage without altering flooding regimes to surrounding sites and prevent unnecessary soil disturbance.

Management Strategies and Controls

Subject to the final approval, it is anticipated that the following strategies and controls will be undertaken, as required:

- Gross pollutant traps may be installed at constructed culverts to maintain water quality levels downstream. This would also work as a sediment control protection measure, as a sediment trap.
- If possible, vegetation to be planted around the culverts to provide additional biological treatment for the stormwater runoff.
- Soil disturbance is to be avoided where possible, especially around water bodies, such as through the use of handheld machinery rather than heavy machinery. Where soil is disturbed stabilisation and rehabilitation is to be undertaken, for example through vegetation, rolled erosion control products or spray-on soil stabilisers.
- In all excavation activities, subsoil and topsoil are to be separated and replaced in their natural configuration to assist revegetation.
- Topsoil is to be stockpiled appropriately to minimise weed infestation, maintain soil organic matter, and to maintain soil structure and microbial activity.
- Tree felling must avoid soil disturbance where possible.

1.23. TRAFFIC AND TRANSPORT

Objectives

The main objective of this section of the EMP framework is to maintain the surrounding road network, avoid damage to existing infrastructure and to reduce impacts of potential traffic increases and maintain a safe road network.

Management Strategies and Controls

The strategies and specific controls will be outlined in a Traffic Management Plan (TMP) prepared for the project as a condition of consent and in consultation with Council, VicRoads and any other relevant stakeholders. It is expected to include, as a minimum, measures to ensure that:

- Internal site access roads are to be constructed to the requirements of the CFA.
- Vehicle maintenance and monitoring controls to be undertaken by the EPC contractors and sub-contractors.
- Noise controls to be installed where reasonable and practicable.
- Schedule for construction vehicle movements to be consistent with the allowed working hours (7:00 and 18:00 Monday to Saturday) for all stages. Any site access required during operational period will generally be Monday to Friday between 6:00 and 16:00 but may occasionally take place on Saturdays if necessary.
- Shuttle services and schedules from surrounding towns or accommodation premises as required.
- Consultation plans with the local community and monitoring of related traffic complaints (if received).
- Confirmation of expected traffic volumes generated by the solar farm for all work stages.
- Identification of all Heavy Vehicle (HV) and Over-Dimensional (OD) vehicle haulage routes for all work stages.
- A mechanism to review identified haulage route road conditions prior to the commencement of works.
- Mechanisms/agreements (if deemed necessary) to maintain haulage route roads and road infrastructure, including local public roads used by site traffic, during construction works and to reinstate roads to at least pre-construction conditions.
- Qualify any requirement for specific work stage construction traffic management plans.
- Qualify and identify any relevant mechanisms for OD vehicle permits and traffic management requirements.
- Confirm on-site the adequacy of available sight distances along all proposed site access locations and intersections.

1.24. VISUAL AMENITY & LIGHT SPILL

Objectives

The main objectives of this section of the EMP framework are to minimise glint and glare impacts to surrounding land uses during operation, minimise negative visual amenity impacts on neighbouring sites and to address any light spill impacts on adjacent sites.

Management Strategies and Controls

Subject to the final approval, it is anticipated that the following strategies and controls will be undertaken, as required:

- Urgent maintenance works during hours of darkness may have external security lights. Any operation during darkness hours should have consideration to lighting impacts on adjacent receivers when possible.
- All lighting installed and operated at the site must comply with AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting.
- A solar module resting angle between 12 and 60 degrees is recommended to avoid any potential glare impacts to any receptor within 1km of the site including road users (the resting angle for the tracking systems is expected to be between 45 and 60 degrees). No further operational measures are required bar to keep the resting angle over 12 degrees at all time.
- Landscaping will be implemented in accordance with the Landscaping Strategy to ameliorate any possible impacts on adjacent receivers.

1.25. WASTE

Objectives

The main objective of this section of the EMP framework is to ensure that generated waste during construction, operation and decommission is disposed responsibly and lawfully in accordance with EPA legislation.

Management Strategies and Controls

A Waste Management Plan is to be prepared as a condition of consent, detailing all measures to be taken through the lifecycle of the project, these could include, but are not limited to:

- Any waste material that is unable to be reused, re-processed or recycled will be disposed at a facility approved to receive that type of waste.
- Site induction to include waste management information.
- Recording of all waste by contractors.
- Use of pre-order and prefabricated material where possible.
- Waste recycling through separation and storage of recyclable and non-recyclable materials. Separate storage for putrescible, cardboard, and mixed recycling waster.
- Collection of waste by a licensed contractor.
- Green waste (including compost from the onsite) and topsoil is to be recycled for use in site landscaping if possible.
- Waste collection must only take place during working hours and days only.
- Any hazardous waste is to be segregated from other waste types and stored in bunded areas and managed to prohibit spills or washing off.

1.26. ENVIRONMENTAL MANAGEMENT SYSTEMS

The construction and operation of the Project must be in accordance with environmental management systems that are consistent with AS/NZS ISO 14001. This is to be undertaken by the construction team during the development of its construction methodology. Environmental management systems provide organisations with a framework and systematic approach to achieving their organisation level objectives for environmental management and sustainability and driving continuous improvement.

Environmental management systems for the Project must be consistent with the parent company organisation level policies, plans, procedures, Project-specific management plans, and activities to provide a systematic method of managing the environmental aspects of the Project that are within each organisation's control or influence. Key components must include:

- Leadership and commitment.
- Environmental policy.
- Responsibilities and authorities for environmental management.
- Environmental risk and opportunity assessment and actions to address these.
- Requirements for setting and achieving objectives and achieving compliance with environmental legislation.
- Requirements for competency and awareness.
- Communication and reporting.
- Management of documentation and records.
- Operational control including emergency preparedness and response.
- Monitoring procedures and internal and external audit program.
- Processes for responding to incidents and non-conformance and implementing corrective and preventative action.
- Review and continuous improvement.

Contractors must develop and implement an environmental management system that is certified to AS/NZS ISO 14001. The environmental management system must be appropriate to the contractor's activities for the Project and be reviewed by BrightNight Power.

1.27. SUSTAINABILITY AND CLIMATE

The proposed Mortlake Energy Hub would greatly contribute towards achieving Victoria's climate targets for 2030 and net zero by 2050. With approximately 360MW of installed peak PV power, the proposal would help reduce a significant amount of CO_{2e} annually, assuming a Scope 2 emissions factor of 0.85 as per the 2022-2023 EERS release.

This would equate to a reduction of 1% of Victoria total annual Greenhouse Gas Emissions (GHG) from 2021 from electricity as energy source. This would translate into approximately 11% of the 2030 Victoria Renewable Energy target and approximately 5% of the 2035 Renewable Energy target.

DISCLAIMER

This report is dated 06 May 2024 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of BrightNight Power **(Instructing Party)** for the purpose of EMPF **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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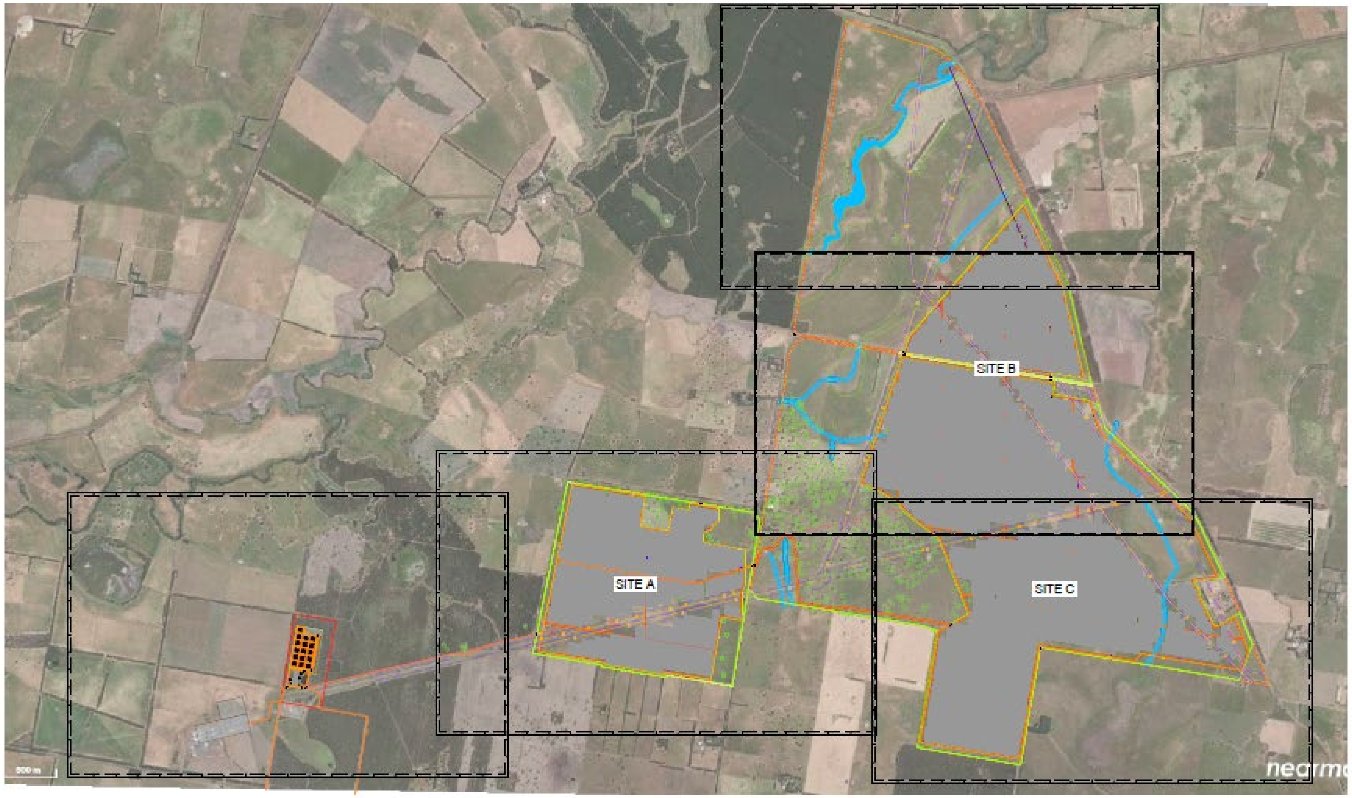
This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

SITE PLAN

MORTLAKE ENERGY HUB
SITE PLAN



PROJECT DETAILS	
BOUNDARY AREA	[illegible]
PANEL AREA	[illegible]
GATES	[illegible]
DC CAPACITY	[illegible]
AC CAPACITY	[illegible]
PV MODULES	[illegible]
STRING TRACKERS	[illegible]
SOLAR INVERTER SKID	[illegible]
BESS INVERTER SKID	[illegible]
ROW DISTANCE	[illegible]
SECURITY FENCE LENGTH	[illegible]

GENERAL LEGEND

- DEVELOPMENT BOUNDARY
- PERIMETER FENCE
- SECURITY FENCE
- UNDERGROUND CABLE 33kV
- ACCESS ROADS
- PUBLIC ROADS IN RESERVE
- EXTERNAL VEGETATION BUFFER
- INTERNAL FIRE SAFETY BUFFER (10m)
- EXISTING EASEMENT POWERLINES SET WITHIN
- OVERLAND FLOW PATH
- PASSING BAYS
- GATES
- WATER TANK
- WATER TANK
- SOLAR INVERTER
- EXISTING VEGETATION - REMOVED
- EXISTING VEGETATION - RETAINED

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PROJECT
MORTLAKE ENERGY HUB
SITE PLAN
HAMILTON HIGHWAY, MORTLAKE 3272
VICTORIA, AUSTRALIA

KEY PLAN

REV	DESCRIPTION	DWN	CHK	DATE
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D	FOR REVIEW	AP	BB	[illegible]
C	FOR REVIEW	[illegible]	BB	[illegible]
B	FOR REVIEW	AP	BB	[illegible]
A	INTERNAL DRAFT FOR REVIEW	AP	BB	[illegible]

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CLIENT
MORTLAKE ENERGY HUB

DRAWING TITLE
000-CS COVERSHEET 00

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PROJECT
MORTLAKE ENERGY HUB
SITE PLAN
HAMILTON HIGHWAY, MORTLAKE 3272
VICTORIA, AUSTRALIA

KEY PLAN

REV	DESCRIPTION	DWN	CHK	DATE
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D	FOR REVIEW	AP	RB	11.04.2024
C	FOR REVIEW	CB	RB	19.03.2024
B	FOR REVIEW	AP	RB	28.02.2024
A	INTERNAL DRAFT FOR REVIEW	AP	RB	13.12.2023

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001-CS DETAIL PLAN 01

ISSUE
FOR APPROVAL

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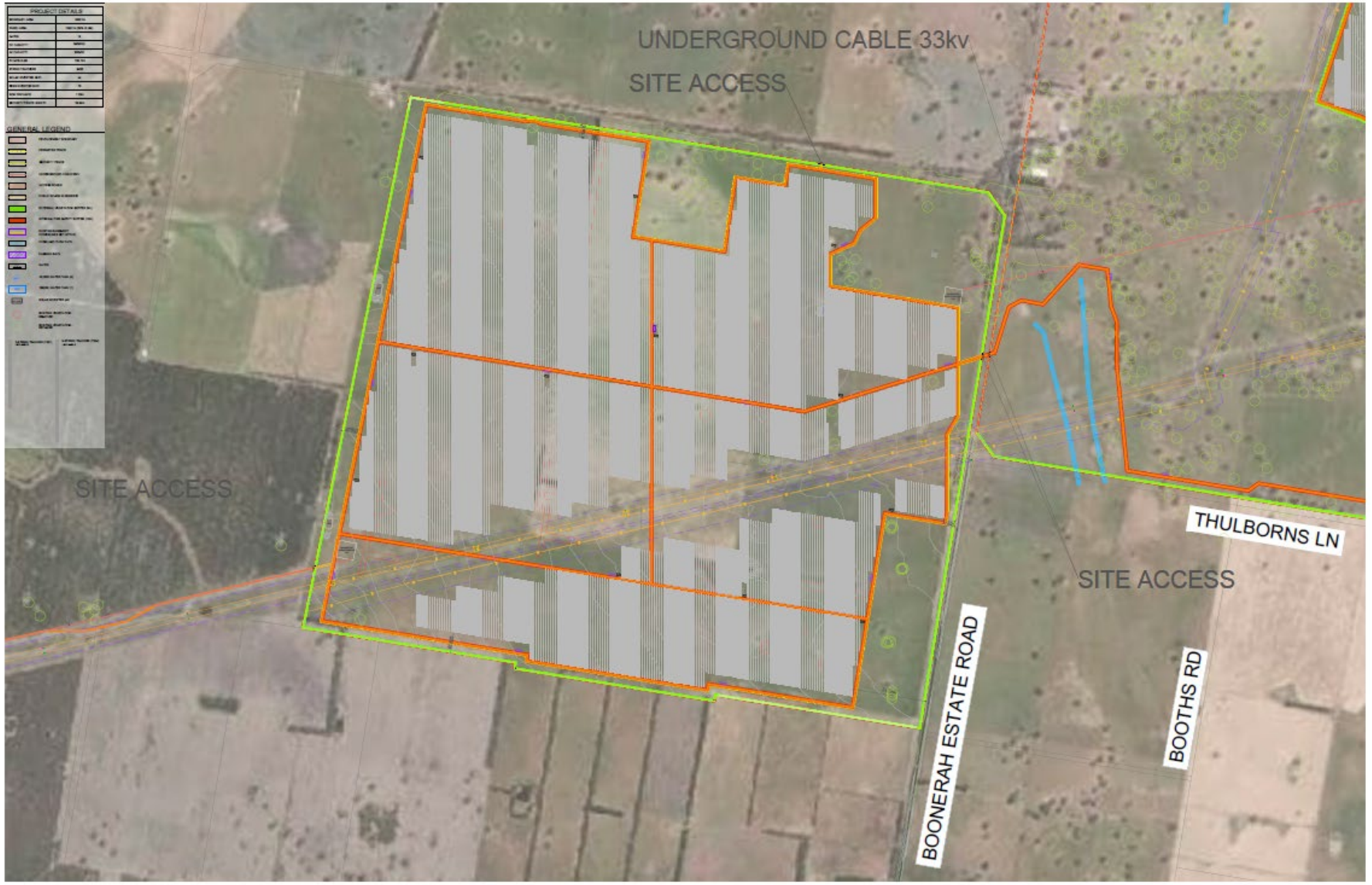

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PROJECT
MORTLAKE ENERGY HUB
SITE PLAN
HAMILTON HIGHWAY, MORTLAKE 3272
VICTORIA, AUSTRALIA

KEY PLAN

REV	DESCRIPTION	DWN	CHK	DATE
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D	FOR REVIEW	AP	RB	11.04.2024
C	FOR REVIEW	CK	RB	16.03.2024
B	FOR REVIEW	AP	RB	28.02.2024
A	INTERNAL DRAFT FOR REVIEW	AP	RB	15.12.2023

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MORTLAKE ENERGY HUB

DRAWING TITLE
002-CS DETAIL PLAN 02

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MORTLAKE ENERGY HUB

SITE PLAN

HAMILTON HIGHWAY, MORTLAKE 3272

VICTORIA, AUSTRALIA

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E	FOR APPROVAL	AF	RB	29.04.2024
D	FOR REVIEW	AF	RB	11.04.2024
C	FOR REVIEW	AF	RB	05.03.2024
B	FOR REVIEW	AF	RB	26.02.2024
A	INTERNAL DRAFT FOR REVIEW	AF	RB	15.12.2023

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MORTLAKE ENERGY HUB

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DRAWING TITLE
003-CS DETAIL PLAN 03
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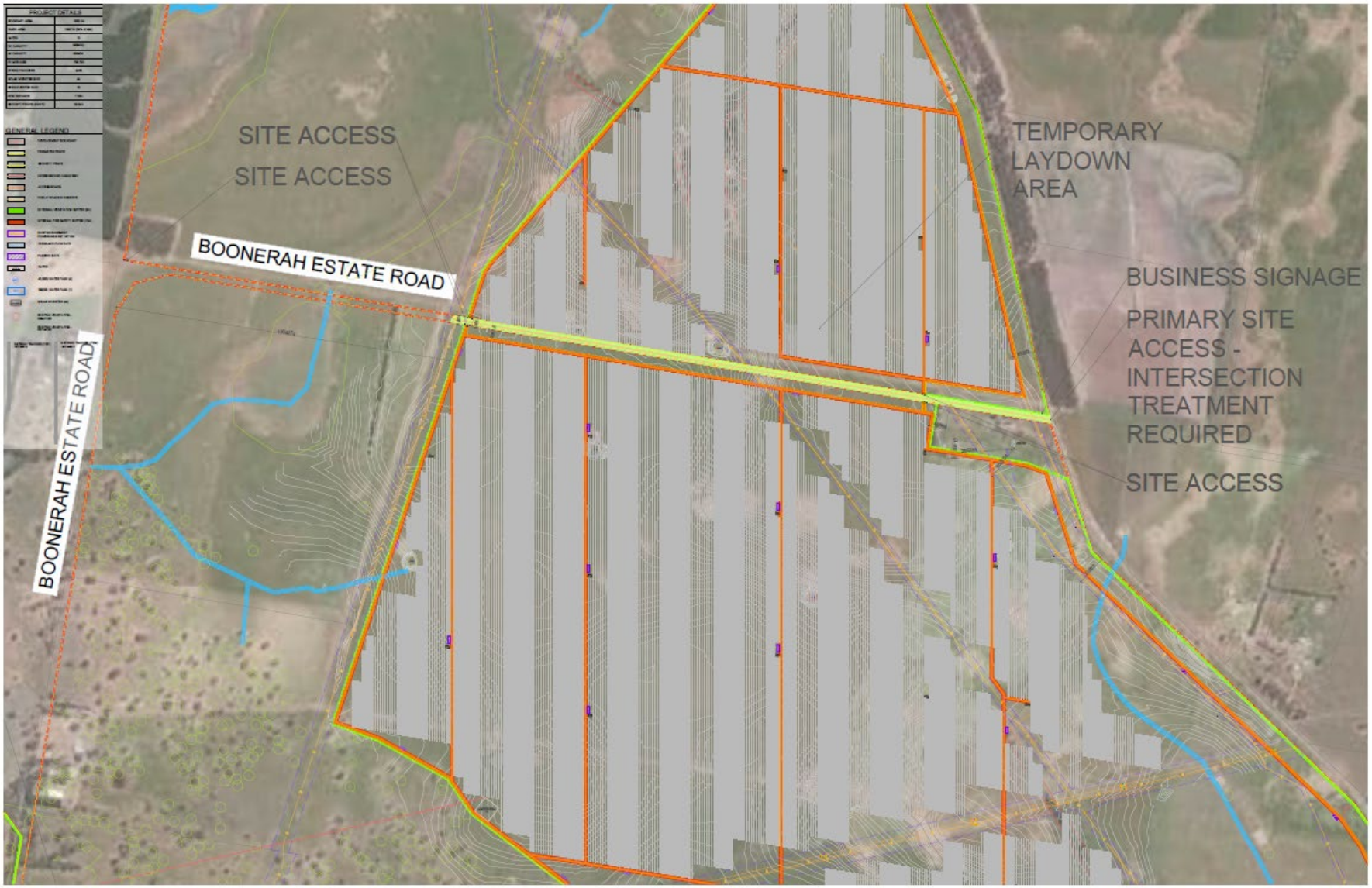

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MORTLAKE ENERGY HUB
SITE PLAN
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KEY PLAN

REV	DESCRIPTION	DWN	CHK	DATE
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D	FOR REVIEW	AF	RB	11.04.2024
C	FOR REVIEW	OB	RB	16.03.2024
B	FOR REVIEW	AF	RB	28.02.2024
A	INTERNAL DRAFT FOR REVIEW	AF	RB	15.12.2023

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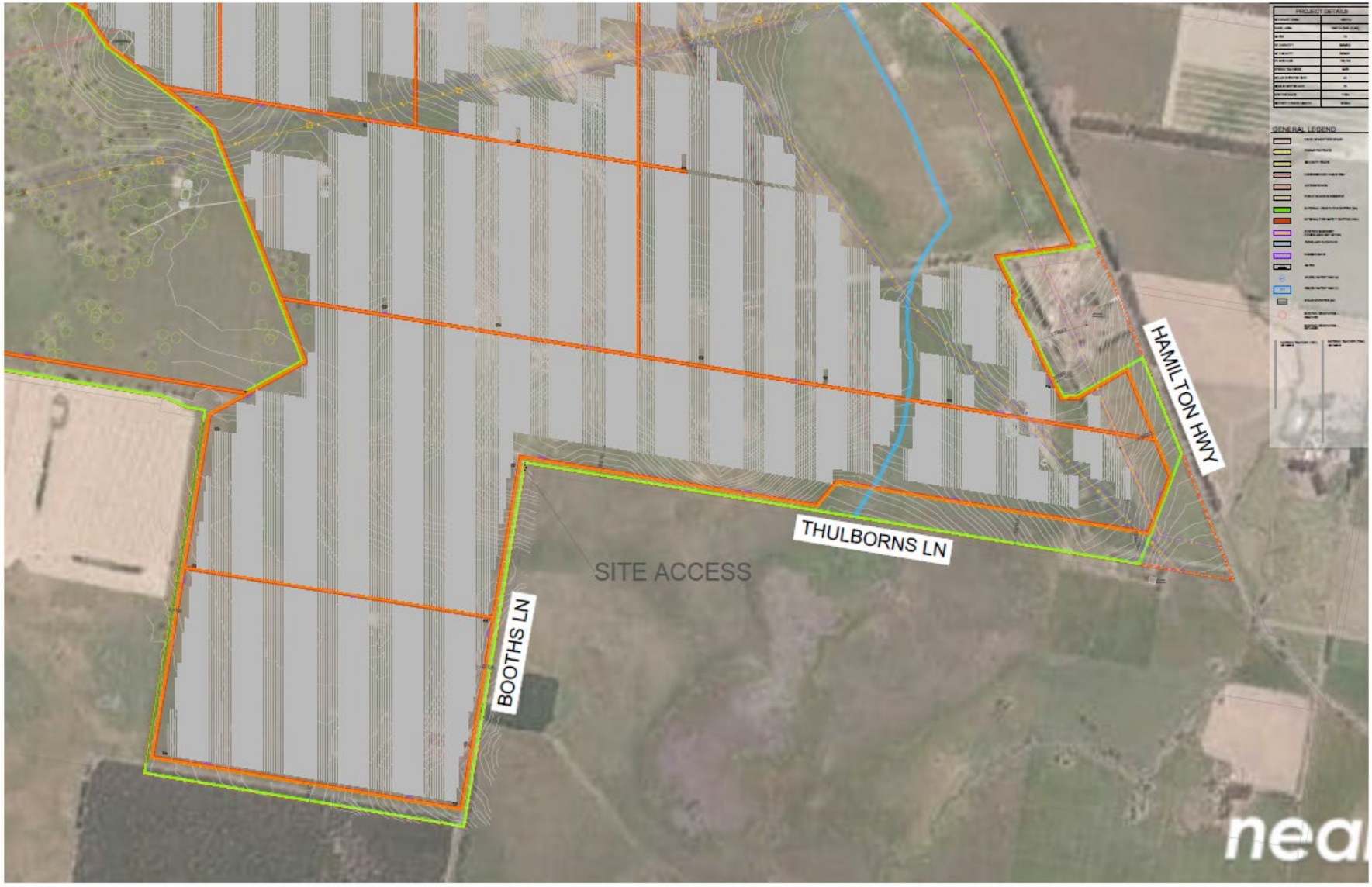

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MORTLAKE ENERGY HUB
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KEY PLAN

REV	DESCRIPTION	DWN	CHK	DATE
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C	FOR REVIEW	CR	BR	18.03.2024
B	FOR REVIEW	AF	BR	28.02.2024
A	INTERNAL DRAFT FOR REVIEW	AF	BR	15.12.2023

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