

ADVERTISED PLAN

ib vogt Development Australia Pty Ltd

Giddi Battery Energy Storage System Planning Assessment Report

This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright

April 2026



Question today Imagine tomorrow Create for the future

Giddi Battery Energy Storage System Planning Assessment Report

ib vogt Development Australia Pty Ltd

WSP

Level 11, 567 Collins St
Melbourne VIC 3000

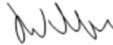


Tel: +61 3 9861 1111

Fax: +61 3 9861 1144

wsp.com

ADVERTISED PLAN

Rev	Date	Details
A	16/12/2025	DRAFT for Client review
A1	17/12/2025	Final
B	27/03/2026	DRAFT for Client review, update following DTP RFI and Community consultation drop in 1.
C	07/04/2026	Final

	Name	Date	Signature
Prepared by:	Jacqui Willis	25/03/2026	
Reviewed by:	Kerri Halliday	07/04/2026	
Approved by:	Alex Moody	07/04/2026	

WSP acknowledges that every project we work on takes place on First Peoples lands.
We recognise Aboriginal and Torres Strait Islander Peoples as the first scientists and engineers and pay our respects to Elders past and present.

This document may contain confidential and legally privileged information, neither of which are intended to be waived, and must be used only for its intended purpose. Any unauthorised copying, dissemination or use in any form or by any means other than by the addressee, is strictly prohibited. If you have received this document in error or by any means other than as authorised addressee, please notify us immediately and we will arrange for its return to us.



Table of contents

ADVERTISED PLAN

Abbreviations	iv
1 Introduction	1
1.1 Project Context	1
1.1.1 Site selection	2
1.1.2 Permit requirement	2
1.1.3 Technical Reports	2
1.1.4 Regulatory and Stakeholder Consultation	2
1.1.5 The proponent	4
1.2 Planning permit application	4
1.2.1 Purpose of this report	4
1.2.2 Approval pathway	4
1.2.3 Permit history	4
1.2.4 Supporting documentation	5
2 Site context	6
2.1 The site	6
2.1.1 Legal description	6
2.1.2 Land use and existing infrastructure	6
2.2 Surrounding context	7
2.2.1 Land use and sensitive receptors	7
2.2.2 SEC Transmission Line and Gas pipeline	7
2.2.3 Extractive industries	7
3 The Project	8
3.1 Key components	8
3.2 Program details	8
3.2.1 Construction	8
3.2.2 Decommissioning	9
3.3 Stakeholder Engagement	9
3.3.1 Engagement tools	10
4 Legislative framework	11
4.1 Commonwealth legislation	11
4.2 State legislation	11
5 Strategic framework	14
5.1 Relevant Victorian strategies	14
5.1.1 Victoria's Renewable Energy Zones	14
5.1.2 Victoria's Renewable Energy Action Plan	14



ADVERTISED PLAN

6	Planning assessment.....	16
6.1	Planning policy and controls	16
6.1.1	Municipal planning strategy	16
6.1.2	Planning policy framework.....	16
6.1.3	Land use terms	18
6.1.4	Zones.....	18
6.1.5	Overlays	20
6.1.6	Particular and general provisions.....	21
6.1.7	Decision guidelines.....	24
7	Environmental assessment.....	29
7.1	Agriculture	29
7.2	Biodiversity	30
7.3	Community Engagement	31
7.4	Contaminated Land – Preliminary Site Investigation	32
7.5	Fire Risk.....	32
7.5.1	Fire protection controls and mitigation measures	33
7.6	Flood and Hydrology.....	35
7.7	Geotechnical	36
7.8	Heritage	36
7.8.1	Aboriginal Cultural Heritage.....	36
7.8.2	Historic Heritage	37
7.9	Landscape and Visual.....	38
7.10	Noise and Vibration.....	39
7.11	Traffic.....	40
8	Conclusion.....	41
9	Limitations	42
9.1	Permitted Purpose.....	42
9.2	Qualifications and Assumptions	42
9.3	Use and Reliance	42
9.4	Disclaimer	43

List of appendices

Appendix A Certificate of Title - Lot 2 LP62063



Appendix B Concept Layout Plan and Elevations
Appendix C Community Engagement Report
Appendix D Contaminated Land – Preliminary Site Investigation
Appendix E Fire Risk Management Plan and Fire Safety Study
Appendix F Flood Risk Assessment
Appendix G Desktop Geotechnical Assessment
Appendix H Historic Heritage Assessment
Appendix I Noise and Vibration Assessment
Appendix J Traffic Impact Assessment
Appendix K Agricultural Assessment – Technical Note
Appendix L Landscape and Visual Impact Assessment

**ADVERTISED
PLAN**

Abbreviations

AH Act	<i>Aboriginal Heritage Act 2006</i>
BBPS	Baw Baw Planning Scheme
BBSC	Baw Baw Shire Council
BESS	Battery Energy Storage System
BMO	Bushfire Management Overlay
CaLP Act	<i>Catchment and Land Protection Act 1994</i>
CEMP	Construction Environment Management Plan
CFA	Country Fire Authority
CHMP	Cultural Heritage Management Plan
CMA	Catchment Management Authority
dB	Decibel
dBA	A-weighted decibel
DEECA	Department of Environment, Energy and Climate Action
DTP	Department of Transport and Planning
EE Act	<i>Environment Effects Act 1978</i>
EP Act	<i>Environment Protection Act 2017</i>
EPA	Environment Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPR	<i>Environment Protection Regulations 2021</i>
ESV	Energy Safe Victoria
FFG Act	<i>Flora and Fauna Guarantee Act 1988</i>
FRV	Fire Rescue Victoria
FZ	Farming Zone
GDE	Groundwater Dependent Ecosystems
GLaWAC	Gunaikurnai Land and Waters Aboriginal Corporation
ha	Hectare
Heritage Act	<i>Heritage Act 2017</i>
HV	High voltage
ib vogt	ib vogt Development Australia Pty Ltd

**ADVERTISED
PLAN**

kV	kilovolt
LGA	Local government area
MNES	Matters of National Environmental Significance
MW	Megawatt
MWh	Megawatt per hour
P&E Act	<i>Planning and Environment Act 1987</i>
PPF	Planning Policy Framework
REZ	Renewable Energy Zones
The Project	Giddi BESS Project
The Site	Lot 2 LP62063, 59 Rowells Road, Trafalgar East
VPPs	Victoria Planning Provisions
Wildlife Act	<i>Wildlife Act 1975</i>
WSP	WSP Australia Pty Limited

**ADVERTISED
PLAN**

1 Introduction

1.1 Project Context

ib vogt Development Australia Pty Ltd (ib vogt) is seeking to develop the Giddi Battery Energy Storage System (BESS), the Project. The Project is located in Trafalgar East, approximately 130 kilometres (km) east of Melbourne and covers an area of approximately 18 hectares.

The Giddi BESS Project will be Stage 1 of a proposed development that will include Giddi BESS and Trafalgar East Hybrid Solar Farm to be located in Trafalgar East, which spans two properties with a combined area of approximately 360 hectares. To meet grid connection requirements the proposed development of Giddi BESS and Trafalgar East Hybrid Solar Farm will be delivered across two stages.

Giddi BESS (Stage 1), includes the installation of a 360-megawatt (MW) BESS, a substation, and a 220 kilovolt (kV) connection to the existing AusNet transmission line (Rowville to Yallourn) that traverses the Site. This stage will be located on the property at 59 Rowells Road, Trafalgar East, which is currently used for growing commercial feed for cattle and sheep, and includes a goat dairy. The Project layout is shown in Appendix B.

Infrastructure associated with the Giddi BESS (Stage 1) includes:

- A 360MW BESS
- Inverters and transformers
- Rooms for control, operation and maintenance
- A switchyard
- A 220kV substation
- Internal access roads
- Perimeter boundary fencing

**ADVERTISED
PLAN**

The Trafalgar East Hybrid Solar Farm (Stage 2) includes the installation of an additional 200 MW BESS and a 200 MW solar power generation array configured with a single 200MW point of connection. This stage is located across the remainder of the Rowells Road property and the adjacent property at 363 Embletons Road which is currently used for grazing beef cattle.

Infrastructure associated with the Trafalgar East Hybrid Solar Farm (Stage 2) includes:

- A 200MW BESS
- A 200MW solar array
- Inverters and transformers
- Rooms for control, operation and maintenance
- A switchyard
- A 220kV substation
- Internal access roads
- Perimeter boundary fencing

As part of Stage 2, a small transmission easement will be required to connect the two properties. It is proposed that this connection utilise an existing council road easement between the sites or adjacent private land.

This planning permit application pertains to Stage 1 Giddi BESS only.

1.1.1 Site selection

The site has been selected based on a collection of attributes that make it an ideal location for a BESS project, including:

- immediate access to existing high capacity transmission infrastructure, removing the requirement for new transmission lines
- good separation from nearest neighbours, with the closest neighbour being approximately 1km away,
- the Project footprint is largely utilising heavily disturbed flat land currently hosting industrial scale sheds, and associated agricultural infrastructure. Accordingly there are minimal visual or environmental impacts from the Project.
- is located at the end of a cul de sac, meaning that there are very limited traffic volumes passing the site or with views over the site, along with mature roadside vegetation that provides visual screening.

1.1.2 Permit requirement

The Project requires a planning permit for the use and development of the land at the site for a *utility installation* (BESS, electrical substation, and associated infrastructure) in accordance with the following provisions of the Baw Baw Planning Scheme (BBPS).

Table 1-1 Summary of Planning Permit requirement (Source: Baw Baw Planning Scheme)

Planning Scheme reference	A Planning Permit is required for:
Clause 35.07-1 Farming Zone	Use of land for a utility installation
Clause 35.07-4 Farming Zone	Buildings and works associated with a use in Section 2 of Clause 35.07-1
Schedule to Clause 35.07 Farming Zone 1.0 Subdivision and other requirements	Earthworks which change the rate of flow or the discharge point of water across a property boundary.

1.1.3 Technical Reports

This Planning Permit Application is supported by the following technical reports, discussed further in Section 7.

- Agriculture
- Community Engagement
- Contamination and Hazards
- Fire Risk
- Flood and Hydrology
- Geotechnical
- Historic Heritage
- Landscape and Visual
- Noise and Vibration
- Traffic

**ADVERTISED
PLAN**

1.1.4 Regulatory and Stakeholder Consultation

ib vogt have had the following pre-application meetings and engagement with key stakeholders, prior to submission of this Planning Permit Application, outlined in Table 1-2.

ADVERTISED PLAN

Table 1-2 Stakeholder Consultation Activities

Tool	Key stakeholders	Details
Newsletter distribution and door knocking	Local residents/landholders within Trafalgar East (within 1 km from Project site).	The newsletter was distributed between the 5 and 6 of November 2025. — 27 properties received the newsletter. — 5 neighbouring landholders direct conversations
Email and phone for project enquiries: Email: giddibess@ibvogt.com Website: www.giddibess.com.au 1800 line: 1800 739 274	Residents within Trafalgar East.	Up to 30 March 2026, four calls and three emails have been received by Project team and followed up within the same day.
Project briefings for key stakeholders	<ul style="list-style-type: none"> — Gunaikurnai Land and Waters Aboriginal Corporation — Baw Baw Shire Council – Statutory Planning — Bettermentall – Mental health support group — Trafalgar Country Fire Authority (CFA) — Trafalgar East Community Hall — Department of Transport and Planning (DTP) 	Undertaken between June and November 2025. Key themes discussed: — Land use and location: competing demands between productive farmland and renewable energy projects — Local economic benefits — Benefit-sharing preferences — Safety considerations, risk of bushfire and emergency services — Landscape and visual impacts — Noise impacts
Project Newsletter #2 and Newspaper advertisement	Local residents and landholders within Trafalgar East. Readers of the Warragul and Drouin Gazette	Distribution of a second newsletter occurred on 12 th February 2026 to provide an update on the project and invitation for the planned Community drop in session on 24 th February 2026. A Newspaper advertisement was placed in the Warragul and Drouin Gazette on 10 th February 2026.
Community drop in session	A Community drop in session was held at the Trafalgar Public Hall on 24 th February 2026.	The session was attended by approximately 60 people, the majority of attendees living in Trafalgar, Trafalgar East, Westbury and Moe with others attending from Darnum and Yarragon. Key themes of the session related to impacts to Agricultural land use, Potential Fire risk and project location.
Project and Community benefit sharing survey	Local residents and landholders within Trafalgar East, attendees at the Community drop in session.	An online survey was created to collect feedback from the Community on the project, engagement to date and benefit sharing initiatives the Project can bring to the local area. The results of the survey will be included in the Community Engagement Outcomes Report, which is currently under preparation.

ADVERTISED PLAN

1.1.5 *The proponent*

ib vogt is a leading utility-scale solar development platform with a global footprint and a 20-year track record of 4.7GW of PV built or under construction. From their head office in Berlin, they currently have a 55GW global development pipeline of PV, wind and BESS, including a forecast 20GW target for BESS projects by 2028, and independent power producer (“IPP”) business model. This includes successfully raising a cumulative euro €4.4 Billion (\$AUD 7.26 Billion) of project financing. ib vogt currently have over 900 employees operating across 34 countries, and utilised joint venture arrangements in 19 countries. They operate across the entire renewable project lifecycle including:

- Project Development
- Financing and Power Purchase Agreements
- Engineering, Procurement and Construction
- Operations and maintenance
- Asset management

ib vogt have had a presence in Australian operations since 2016 with the development and construction of the 11MW Williamsdale Solar Farm in the ACT. Notably this was the first single axis tracker project developed in Australia. The 60MW Yanco Solar farm in NSW was sold to Origin Energy in 2022. ib vogt currently have a substantial pipeline of 1.8GW of PV and BESS projects under development in Australia. A number of these projects are focused on colocation with agricultural operations, mainly sheep grazing.

1.2 Planning permit application

1.2.1 *Purpose of this report*

ib vogt has engaged WSP Australia Pty Limited (WSP) to prepare an Application for Planning Permit on their behalf to support the statutory approval requirements for the Project. The purpose of this report is to respond to the statutory planning objectives, and to summarise the potential impacts and appropriate management measures during the construction and operation phases of the project. It is anticipated that the construction contractor will complete the detailed design phase of the project generally in accordance with the development layout plan presented in this Application for a Planning Permit.

1.2.2 *Approval pathway*

In accordance with Clause 72.01 of the BBPS, The Project requires approval from the Minister for Planning for the use and develop of the land at the site for a utility installation ‘to transmit, distribute or store power’. This report and supporting documentation form the Application for a Planning Permit which is deemed to be consistent with Section 47 of the *Planning and Environment Act 1987* (P&E Act).

The project is also eligible for assessment under Clause 53.22 (Significant Economic Development) and DTP’s Development Facilitation Program.

Pursuant to the P&E Act, technical assessments are expected to support the approvals process. A summary of the required technical studies has been listed in Section 1.1.3.

1.2.3 *Permit history*

No current planning permits relevant to the proposed development currently exist on the site. A search of the Baw Baw Shire Council and Ministerial Planning Registers identified that there are no currently advertised, or recent relevant planning permit applications within 5km of the Project site.

1.2.4 *Supporting documentation*

This Application for a Planning Permit comprises the following components:

- Completed application form, Certificate of Title (Appendix A) and application fee
- Details of the site locality, key features and existing conditions
- A description of the project
- An outline of the legislative and strategic framework
- An assessment of the planning and environmental considerations
- Information, studies, and technical reports as listed in Section 1.1.3 and summarised in Section 7 of this report.

**ADVERTISED
PLAN**

2 Site context

2.1 The site

The Project is located in Trafalgar East, approximately 130 kilometres (km) east of Melbourne and covers an area of approximately 18 hectares. It is located within the Baw Baw Shire local government area (LGA). The site is approximately 3.7km north of Princes Freeway.

2.1.1 Legal description

The site is legally identified as Lot 2 LP62063, 59 Rowells Road, Trafalgar East, Victoria 3824. The Project is located entirely within the existing parcel boundary. The site is owned by Penelope Anne Gandar.

The Certificate of Title is provided as Appendix A.

Address	59 Rowells Road, Trafalgar East, Victoria
Lot and Plan Number:	Lot 2 LP62063
Registered Proprietor:	Penelope Anne Gandar
Standard Parcel Identifier (SPI):	2\LP62063
Local Government Area (Council):	Baw Baw
Council Property Number:	2218 (Part)

The site sits within a property comprising four parcels, with the site being Lot 2. The overall property has a combined area of 272.64 ha and 8,794 metres perimeter.

The site is subject to a Covenant for the existing Gas Pipeline (Instrument D429818), and a Caveat by Trafalgar Renewables Pty Ltd, part of the proponents option agreement for the site, both have been included in Appendix A for reference.

2.1.2 Land use and existing infrastructure

The Project site is currently occupied by a goat dairy, and associated infrastructure. There is a small caretakers dwelling at the site entry which is planned to be retained during construction of the proposed project. Recent aerial photography of the site taken in August 2025 is provided in Figure 2-1 below.

**ADVERTISED
PLAN**



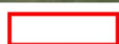
 Giddi BESS Project Area

Figure 2-1 Aerial imagery of the Project Area (Source: MetroMap, August 2025)

2.2 Surrounding context

2.2.1 *Land use and sensitive receptors*

Land use surrounding the project primarily agricultural land with scattered rural residential lots. Dominant farming activities within vicinity of the project include cattle grazing, some sheep grazing and small scale cropping. The nearest sensitive receptor is a rural residential dwelling at 31 Millers Road, Trafalgar East.

2.2.2 *SEC Transmission Line and Gas pipeline*

A ~ 80m wide easement runs through the property to the north of the Project area for the 220kV Rowville to Yallourn Transmission Line. Historical records indicate that this corridor has been used for electricity transmission from the Latrobe Valley to Melbourne since the 1920's, with the current 220kV infrastructure in place since the 1960's. A ~35m wide easement for a Gas pipeline also runs through the property.

The location of both easements is shown in Appendix A Certificate of Title, and in Appendix B Concept Layout Plan and Elevations.

2.2.3 *Extractive industries*

There are no existing or proposed Extractive Industry Work Authorities or Interest Areas within 2km of the Giddi BESS project area.

**ADVERTISED
PLAN**

3 The Project

The Project is seeking approval of a planning permit for the use and development of the land for a utility installation and earthworks which may change the rate or flow or the discharge point of water on a property boundary. Approval for the project is sought in accordance with the BBPS as outlined in Section 6.

3.1 Key components

Stage 1 includes the installation of a 360-megawatt (MW) BESS, a substation, and a 220 kilovolt (kV) connection to the existing AusNet transmission line (Rowville to Yallourn) that traverses the Site. This stage will be located on the property at 59 Rowells Road, Trafalgar East, which is currently used for growing commercial feed for cattle and sheep, and includes a goat dairy.

Infrastructure associated with Stage 1 includes:

- 360MW BESS
- inverters and transformers
- rooms for control, operation and maintenance
- switchyard
- 220kV substation
- internal access roads
- perimeter boundary fencing

**ADVERTISED
PLAN**

3.2 Program details

3.2.1 Construction

During construction, it is understood that the following considerations will be applicable to the subject site:

Construction Timeframe

Construction is expected to take up to 20 months from the point of site establishment through to project commissioning and rehabilitation and is anticipated to comprise the following stages of works:

- Site Preparation and Civil Works – 3 months.
- Fencing and landscaping – 3 months
- Battery Storage Installation – 13 months.
- Substation & switchyard – 7 months.
- Grid Connection and Commissioning – 5 months.

Construction Hours

It is expected that construction and development of the site will be undertaken in line with typical working hours for a construction project. These are:

- Weekdays – 7 am to 6 pm
- Saturday – 7 am to 1 pm.

ADVERTISED PLAN

3.2.2 Decommissioning

Battery cells typically have a lifespan of around 15 years, as the battery cells degrade they will typically be replaced on a container by container basis.

Subject to favourable economic conditions and projected reductions in battery costs, the facility has the potential to remain in service for several decades. If decommissioning is required, all above-ground infrastructure will be dismantled and removed, and the site will be reinstated to its pre-development condition.

There will be an emphasis on recycling of batteries and metals, and any hazardous waste will be managed in accordance with best practice standards and regulatory requirements.

3.3 Stakeholder Engagement

Throughout the planning and development of the project, ib vogt have undertaken consultation with interested and affected parties to inform the community and key stakeholders of the project and obtain feedback.

Table 3-1 details the stakeholders that been consulted throughout the project development to date.

Table 3-1 Stakeholders

Stakeholder	Purpose	Consultation method	Date
Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC)	Project Introduction and CHMP 20778 Inception	In person, on Project Site. Attended by representatives from GLaWAC, ib vogt and EMM Consulting.	26 June 2025
Baw Baw Shire Council	Project Introduction and Pre-application meeting	In person, Baw Baw Shire Council Office – Drouin, attended by ib vogt and WSP.	5 November 2025
Trafalgar Country Fire Authority	Project Introduction and Pre-application meeting	In person, attended by ib vogt and WSP.	6 November 2025
Department of Transport and Planning – Energy Assessment	Project Introduction and Pre-application meeting	Online, Microsoft Teams, attended by ib vogt and WSP.	19 November 2025
Community – Door knocking	Project Introduction (where available), newsletter and/or ‘Sorry we missed you card delivery.’	In person, attended by ib vogt and WSP.	5 & 6 November 2025
Community – drop in information session	Provide project information, answer questions, collect feedback and inputs for Community benefit sharing initiatives.	In person, Trafalgar Public Hall. Attended by ib vogt and WSP.	24 th February 2026

Feedback and questions received as part of this engagement have been incorporated and addressed in this planning permit application. ib vogt will continue to liaise with stakeholders through the development of the Project, including:

- Department of Transport and Planning

- Department of Environment, Energy and Climate Action
- Fire Rescue Victoria
- Energy Safe Victoria
- Baw Baw Shire Council
- Local Community and surrounding landholders
- Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC)

3.3.1 *Engagement tools*

The Project has implemented and will be implementing further engagement tools throughout the planning process, construction and operation of the project.

- A dedicated project webpage, www.giddibess.com.au
- Regular project newsletters
- Dedicated project phone number 1800 739 274 and email address, giddibess@ibvogt.com

**ADVERTISED
PLAN**

4 Legislative framework

4.1 Commonwealth legislation

The key Commonwealth legislation that applies to the Project is outlined in Table 4-1 below:

Table 4-1 Commonwealth legislation

Legislation	Summary
Environment Protection and Biodiversity Conservation Act 1999	<p>The <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cwlth) (EPBC Act) protects Matters of National Environmental Significance (MNES) including nationally threatened species and ecological communities, wetlands of international importance, and migratory species.</p> <p>The Commonwealth Minister for the Environment and Water is responsible for administering the EPBC Act. Under the EPBC Act, an action (i.e. project, an activity) will require approval from the Minister if the action will have or is likely to have a significant impact on a MNES.</p> <p>No EPBC Act-listed species or communities are considered likely to occur or be impacted by the proposed works. An EPBC Act referral is not recommended.</p> <p>Further detail is provided in Section 7.2.</p>

4.2 State legislation

The relevant state legislation that applies to the Project are outlined in Table 4-2 below:

Table 4-2: State legislation

Legislation	Summary
<i>Environment Effects Act 1978</i>	<p>The <i>Environment Effects Act 1978</i> (EE Act) provides for assessment of some proposed projects (works) that may have a significant effect on the environment. Assessment under the EE Act will inform the approval decisions but will not result in an approval in its own right. The Minister for Planning administering the EE Act decides whether an EES should be prepared.</p> <p>Impacts of the project are not likely to meet the referral criteria set out in the <i>Ministerial guidelines for assessment of environmental effects under the Environment Effects Act 1978 (Ministerial Guidelines) (DSE 2006)</i>. No further assessment is required under the EE Act.</p>
<i>Planning and Environment Act 1987</i>	<p>The P&E Act provides the legal framework for the operation of Victoria's planning system.</p> <p>The P&E Act sets out procedures for preparing and amending the Victorian Planning Provisions (VPPs) and planning schemes, obtaining permits under schemes, settling disputes, enforcing compliance with planning schemes and other administrative procedures.</p> <p>The main functions of the P&E Act are to:</p> <ul style="list-style-type: none"> — set the broad objectives for planning in Victoria — set the main rules and principles for how the Victorian planning system works — set up the key planning procedures and statutory instruments in the Victorian planning system; and

ADVERTISED PLAN

Legislation	Summary
	<ul style="list-style-type: none"> — define the roles and responsibilities of the Minister, councils, governments, government departments, the community and other stakeholders in the planning system. <p>The objectives of the P&E Act, of relevance to the project are:</p> <ul style="list-style-type: none"> — ‘provide for the fair, orderly, economic and sustainable use, and development of land’ — ‘facilitate appropriate development in accordance with the objectives’ — ‘balance the present and future interests of all Victorians.’ <p>Under the P&E Act, the project will require planning approval for:</p> <ul style="list-style-type: none"> — Use of land — Buildings and works — Earthworks — Native vegetation removal <p>The requirements of the P&E Act are discussed further in Section 6 of this report.</p>
<i>Environment Protection Act 2017</i>	<p>The <i>Environment Protection Act 2017</i> (EP Act), was significantly amended by the <i>Environment Protection Amendment Act 2018</i>, came into effect on 1 July 2021. It led to a shift in Victoria’s focus for environment protection and human health to a prevention-based approach, introducing new environmental obligations and protections, which requires actors under the EP Act to take reasonable and practical steps to reduce the human and environmental health risks of their activities.</p> <p>Further detail is provided in Section 7.10 and Appendix I (Operational Noise Assessment).</p>
<i>Environment Protection Regulations 2021</i>	<p>The <i>Environment Protection Regulations 2021</i> (EP Regulations) support the objectives of the EP Act, aiming to prevent or minimise risks of harm to human health or the environment from pollution or waste. They further the purposes of, and give effect to, the EP Act by providing a detailed framework for the practical implementation of the EP Act’s principles.</p> <p>Of relevance to the Project, is that the EP Regulations give effect to the EP Act by imposing obligations in relation to noise pollution and permissible activities under the Act, specifying matters in relation to environmental noise.</p> <p>Further detail is provided in Section 7.10 and Appendix I (Operational Noise Assessment).</p>
<i>Aboriginal Heritage Act 2006</i>	<p>The <i>Aboriginal Heritage Act 2006</i> (AH Act) and <i>Aboriginal Heritage Regulations 2018</i> provides the framework for protections to Aboriginal Heritage throughout Victoria. The <i>Aboriginal Heritage Regulations 2018</i> require a Cultural Heritage Management Plan (CHMP) to be prepared in circumstances involving both:</p> <ul style="list-style-type: none"> — Activities to be completed on land within an area of Aboriginal cultural heritage sensitivity, as described in the <i>Aboriginal Heritage Regulations 2018</i> (Part 2, Division 3). — Activities considered to be ‘high impact’ under the <i>Aboriginal Heritage Regulations 2018</i> (Part 2, Division 5). Section 52(3) of the AH Act provides that no statutory authorisation can be given before a CHMP is approved. <p>Whilst the activity is considered to be ‘high impact’, the site is not located within a mapped area of Aboriginal Cultural Heritage Sensitivity. Accordingly, a mandatory CHMP is not required. A voluntary CHMP is under preparation for Stage 1 of the project.</p>

Legislation	Summary
<p><i>Flora and Fauna Guarantee Act 1988</i></p>	<p>The <i>Flora and Fauna Guarantee Act 1988</i> (FFG Act) provides a framework for the conservation and management of Victoria’s native species, and the processes that threaten native flora and fauna are listed in the schedules of the Act.</p> <p>No threatened flora listed under the FFG Act were observed within the study area. No threatened flora species are considered likely to occur.</p> <p>Similarly, no FFG Act Protected flora species (plant taxa which are not threatened but require protection from removal for other reasons) were recorded, in line with the recent changes to the Declared Protected Flora Guidelines (DEECA, 2024).</p> <p>Further detail is provided in Section 7.2.</p>
<p><i>Wildlife Act 1975</i></p>	<p>The <i>Wildlife Act 1975</i> (Wildlife Act) is the primary legislation in Victoria for the protection of wildlife. The Act requires that wildlife research (i.e. fauna salvage and relocation) is regulated through a permit system, which is managed by DEECA.</p> <p>Authorisation for fauna removal/relocation must be obtained under the Wildlife Act through a licence granted by DEECA. Any persons involved in fauna removal, salvage capture or relocation of fauna during mitigation measures must hold a current Management Authorisation under the Wildlife Act.</p> <p>No habitat for fauna listed under the FFG Act was identified on site. Authorisation under the <i>Wildlife Act 1975</i> will not be required. Further detail is provided in Section 7.2.</p>
<p><i>Catchment and Land Protection Act 1994</i></p>	<p>The purpose of the <i>Catchment and Land Protection Act 1994</i> (CaLP Act) is to manage land and water resources and to control noxious weeds and pest animals. Landowners have the responsibility to take all reasonable steps to prevent the growth and spread of Controlled species. Trade in Restricted species is prohibited.</p> <p>Two CaLP listed weeds were recorded within the study area. Measures to control the spread of these weeds (and other pathogens) during construction must be contained within the CEMP.</p> <p>Further detail is provided in Section 7.2.</p>
<p><i>Heritage Act 2017</i></p>	<p>The <i>Heritage Act 2017</i> (Heritage Act) regulates the protection and conservation of places of heritage significance. The Heritage Act establishes the Victorian Heritage Register and the Victorian Heritage Inventory, for which consents or permits must be obtained before any historic site is disturbed.</p> <p>The project does not contain any items listed on the Victorian Heritage Inventory or Register. If items that meet the listing criteria are identified within the project during construction, permits and consents would be required.</p> <p>Further information is provided in Section 7.8.2 and Appendix H (Historic Heritage Assessment).</p>

**ADVERTISED
PLAN**

5 Strategic framework

Strategic planning in Victoria is a systematic process that involves the identification of long-term goals and the associated strategy development. Applicable plans and strategies at the state level are addressed in Section 5.1. Further discussion of Strategic context is provided in Appendix C (Community Engagement Report).

5.1 Relevant Victorian strategies

5.1.1 Victoria's Renewable Energy Zones

Renewable Energy Zones (REZ) are areas identified as the preferred places to host wind and solar projects and batteries for storage. The 2025 Victorian Transmission Plan has identified 6 proposed renewable energy zones, shown in Figure 5-1.

The project is not located within the proposed Gippsland REZ. Given the importance of new dispatchable generation the project must rely on access to the existing transmission infrastructure (220kV AusNet transmission line) which traverses the property.

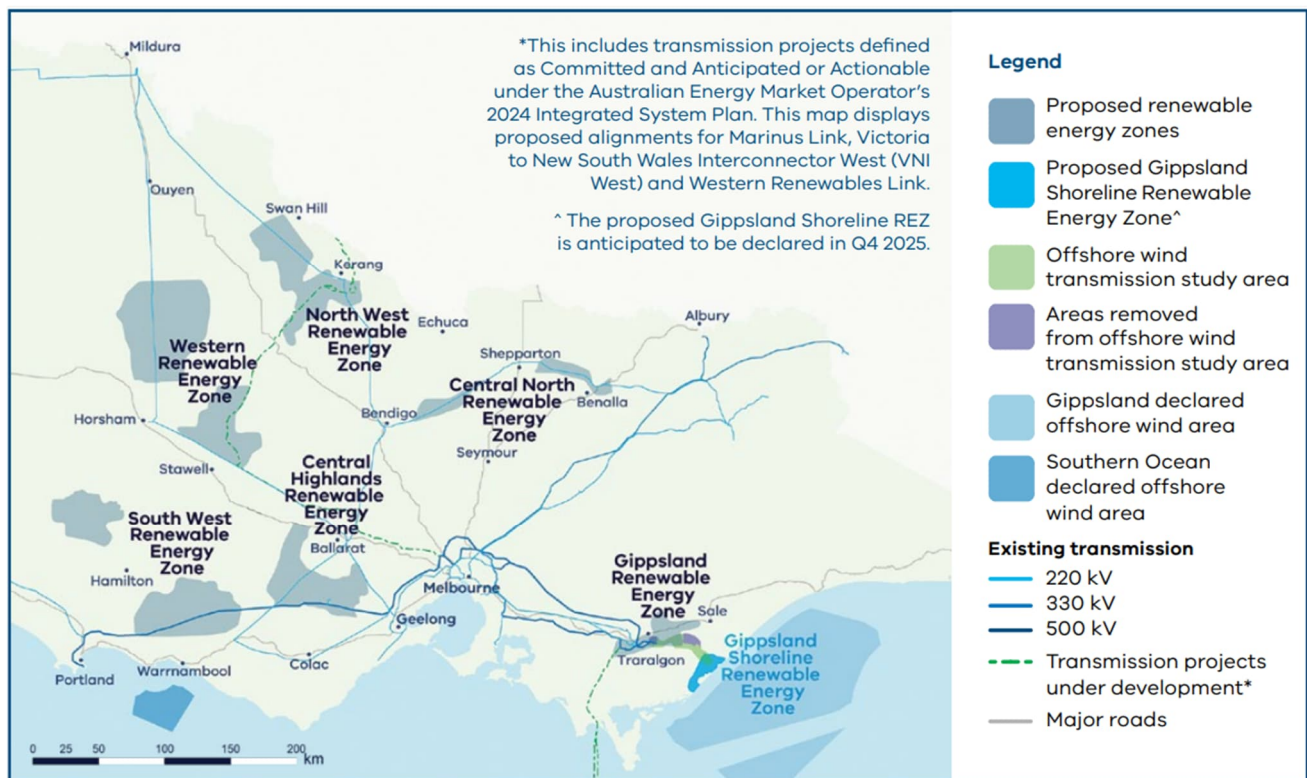


Figure 5-1 Map of Renewable Energy Zones (Source: Victorian Transmission Plan, VicGrid 2025)

5.1.2 Victoria's Renewable Energy Action Plan

The State Government's Renewable Energy Action Plan establishes the strategy for Victoria ensuring a renewable, affordable and reliable energy network whilst reaching net zero emissions energy sector by 2050. Key to the plan is using large scale renewable energy technology and ensuring grid stability. The plan includes a number of key actions relevant to the project:

- Supporting local energy projects across Victoria
- Delivering a more flexible approach to grid connections
- Exploring innovative smart grid, microgrid and storage models

The Project aligns directly with the strategic directives of the plan, particularly through the development of a BESS which enhances the security and reliability of electrical supply.

**ADVERTISED
PLAN**

6 Planning assessment

6.1 Planning policy and controls

The BBPS establishes policies for the use and development of land and provides a framework within which land use planning decisions can be made. A summary of the relevant State and local planning policies is provided below. These have been assessed and applied to the project.

6.1.1 Municipal planning strategy

The Municipal Planning Strategy serves as the overarching strategic planning policy for the Baw Baw Shire. It guides future land use and development within the Shire, and outlines key objectives and responses to emerging issues, ensuring effective management and sustainable growth for the community.

The Strategy outlines the shared economic strengths between Baw Baw Shire and other West Gippsland

The Project is poised to bolster economic activity within the shire through job creation and infrastructure development. Its strategic location, adjacent to the existing 220kV transmission line demonstrates effective land use planning. This location not only capitalizes on the existing electrical infrastructure but also allows for the protection of environmentally and agricultural significant areas elsewhere within the shire. In essence, the Project embodies the shire's vision by creating a balance between economic development, environmental and agricultural preservation.

6.1.2 Planning policy framework

The Planning Policy Framework (PPF) sets the overall context for spatial planning and decision making for Victoria. It seeks to ensure that the *'objectives of planning in Victoria are fostered through appropriate land use and development planning policies and practices'*. As demonstrated in the following Table 6-1, the project meets the requirements of the PPF as set out in the Victoria Planning Provisions (VPPs).

Table 6-1 Planning Policy Framework (Source: Baw Baw Planning Scheme)

Clause	Policy	Relevance
11.01-1R Settlement – Gippsland	Trafalgar is identified as a Secondary town for Moderate growth. The strategy supports moderate population and growth within township boundaries of Trafalgar, subject to land capability for or extension of reticulated services. Trafalgar East is not specified in the Settlement strategy.	The project is located in Trafalgar East, and is not specifically identified as a Settlement area in the PPF. The development of the project will not inhibit the development of Settlement in the designated areas.
11.02-1S Managing growth	The objective of Clause 11.02-1S is to ensure sufficient development opportunities are available to meet the needs of current and future Victorians. The PPF specifies the need to <i>'Maintain access to productive natural resources and an adequate supply of well-located land for energy generation, infrastructure and industry.'</i>	The project proposes to develop energy storage and distribution infrastructure adjacent to the existing 220kV transmission line.
12.01 Biodiversity	Support land use and development that contributes to protecting and enhancing habitat for indigenous plants and animals in urban areas.	The project is being developed on land previously cleared for agricultural land use, and dominated by industrial scale sheds and infrastructure used for the goat dairy. No Native Vegetation Removal is required.

ADVERTISED PLAN

Clause	Policy	Relevance
12.05 Significant Environments and Landscapes	<p>To protect and enhance significant landscapes and open spaces that contribute to character, identity and sustainable environments.</p> <p>Improve the landscape qualities, open space linkages and environmental performance in significant landscapes and open spaces, including green wedges, conservation areas and non-urban areas.</p> <p>Ensure important natural features are protected and enhanced.</p>	<p>The project site is not located within an identified significant landscape area, and is co-located with existing transmission infrastructure and existing roadside vegetation.</p> <p>Refer to Section 7.5 for further information on the assessment of Fire Risk.</p>
13.02 Bushfire	<p>Reducing the vulnerability of communities to bushfire through the consideration of bushfire risk in decision making at all stages of the planning process.</p> <p>Consider as relevant:</p> <p><i>AS 3959-2018 Construction of Buildings in Bushfire-prone Areas</i> (Standards Australia, 2018)</p> <p><i>Building in bushfire-prone areas - CSIRO & Standards Australia</i> (SAA HB36-1993, 1993)</p> <p>Any bushfire prone area map prepared under the <i>Building Act 1993</i> or regulations made under that Act</p>	<p>The project is located within a designated bushfire prone area. Appendix E(Fire Risk Management Plan and Fire Safety Study) has been prepared to support the planning permit application and to address the requirements of CI 13.02-1S.</p> <p>Refer to Section 7.5 for further information on the assessment of Fire Risk.</p>
13.05 Noise	<p>To assist the management of noise effects on sensitive land uses.</p> <p>Ensure that development is not prejudiced and community amenity and human health is not adversely impacted by noise emissions.</p>	<p>As noted in Section 7.10, the noise and acoustic impacts of the Project can be appropriately managed.</p>
18.02 Movement Networks	<p>To facilitate an efficient and safe road network that integrates all movement networks and makes best use of existing infrastructure.</p>	<p>Construction of the Project will utilise existing truck haulage routes for the current goat dairy. As noted in Section 7.11, the existing infrastructure is considered adequate from a traffic engineering perspective.</p>
19.01 Energy	<p>To facilitate appropriate development of energy supply infrastructure.</p> <p>Ensure energy generation, storage, transmission and distribution infrastructure and projects are resilient to the impacts of climate change.</p> <p>Support energy infrastructure projects in locations that take advantage of existing and planned resources and infrastructure networks.</p> <p>Consider the economic, social and environmental benefits to the broader community of renewable energy generation while also considering the need to minimise the effects of a proposal on the local community and environment.</p>	<p>The site is optimal for a BESS project due to its proximity to existing transmission infrastructure, good separation from nearest neighbours (1km), and utilising heavily disturbed land currently hosting large industrial scale sheds and associated infrastructure.</p> <p>BESS facilities, such as that proposed by the Project provide:</p> <ul style="list-style-type: none"> — provide frequency control ancillary services (FCAS) and

ADVERTISED PLAN

Clause	Policy	Relevance
		inertia via grid forming inverters to enhance grid stability — help firm variable renewable energy generation.

6.1.3 Land use terms

Clause 73.03 Land Use Terms of the VPP defines land use associated with the Project as a *utility installation* as shown in Table 6-2.

Table 6-2 Land use terms

Project component	Land use term	Definition
Battery storage Electrical substation Switchyard Transmission line	<i>Utility installation</i>	<i>Land used: c) to transmit, distribute or store power</i>

6.1.4 Zones

Zones are the primary method of organising land and apply to all land in Victoria. Land is zoned for particular uses, such as residential, commercial and industrial. The zone that the project sits within is shown in Figure 6-1 assessed in Table 6-4.



Figure 6-1 Planning Zones (DTP, VicPlan November 2025)

ADVERTISED PLAN

Table 6-3 Zoning purpose

Planning zone	Purpose
35.07 Farming Zone (FZ)	<p><i>To implement the Municipal Planning Strategy and the Planning Policy Framework.</i></p> <p><i>To provide for the use of land for agriculture.</i></p> <p><i>To encourage the retention of productive agricultural land.</i></p> <p><i>To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture.</i></p> <p><i>To encourage the retention of employment and population to support rural communities.</i></p> <p><i>To encourage use and development of land based on comprehensive and sustainable land management practices and infrastructure provision.</i></p> <p><i>To provide for the use and development of land for the specific purposes identified in a schedule to this zone.</i></p>

Table 6-4 Zoning permit requirements

Planning zone	Permit requirements	Relevance
Clause 35.07 Farming Zone (FZ)	<p>Under clause 35.07-1:</p> <p><i>A permit is required for a:</i></p> <ul style="list-style-type: none"> <i>— Utility installation (other than Minor utility installation and Telecommunications facility)</i> <p><i>Under Clause 35.07-4:</i></p> <p><i>A permit is required to construct or carry out any of the following:</i></p> <ul style="list-style-type: none"> <i>— A building or works associated with a use in Section 2 of Clause 35.07-1</i> <i>— Earthworks specified in a schedule to this zone, if on land specified in a schedule</i> <i>— A building which is within any of the following setbacks:</i> <ul style="list-style-type: none"> <i>— The setback from a Transport Zone 2 or land in a Public Acquisition Overlay if the Head, Transport for Victoria is the acquiring authority and the purpose of the acquisition is for a road specified in a schedule to this zone or, if no setback is specified, 50 metres.</i> <i>— The setback from any other road or boundary specified in a schedule to this zone.</i> 	<p><u>Use</u></p> <p>A permit is required under Clause 35.07-1 for a utility installation.</p> <p><u>Buildings and works, earthworks</u></p> <p>A permit is required under Clause 35.07-4 for buildings and works, as well as earthworks.</p> <p><u>Setbacks</u></p> <p>A permit is not required for setbacks.</p>

ADVERTISED PLAN

Planning zone	Permit requirements	Relevance
	<ul style="list-style-type: none"> — <i>The setback from a dwelling not in the same ownership specified in a schedule to this zone.</i> — <i>100 metres from a small second dwelling not in the same ownership.</i> — <i>100 metres from a waterway, wetlands or designated flood plain or, the distance specified in the schedule to this zone.</i> — <i>Any distance specified must be less than 100 metres.</i> <p>Under the Schedule to Clause 35.07:</p> <p>A permit is required on all land in the farming zone for:</p> <ul style="list-style-type: none"> — <i>Earthworks which change the rate of flow or the discharge point of water across a property boundary</i> 	

6.1.5 Overlays

Planning Overlays may include a schedule that enables more specific local objectives, purposes or requirements for specified land than its Zone. Overlays that are relevant to the Project are shown in Figure 6-2 and are discussed in Table 6-5

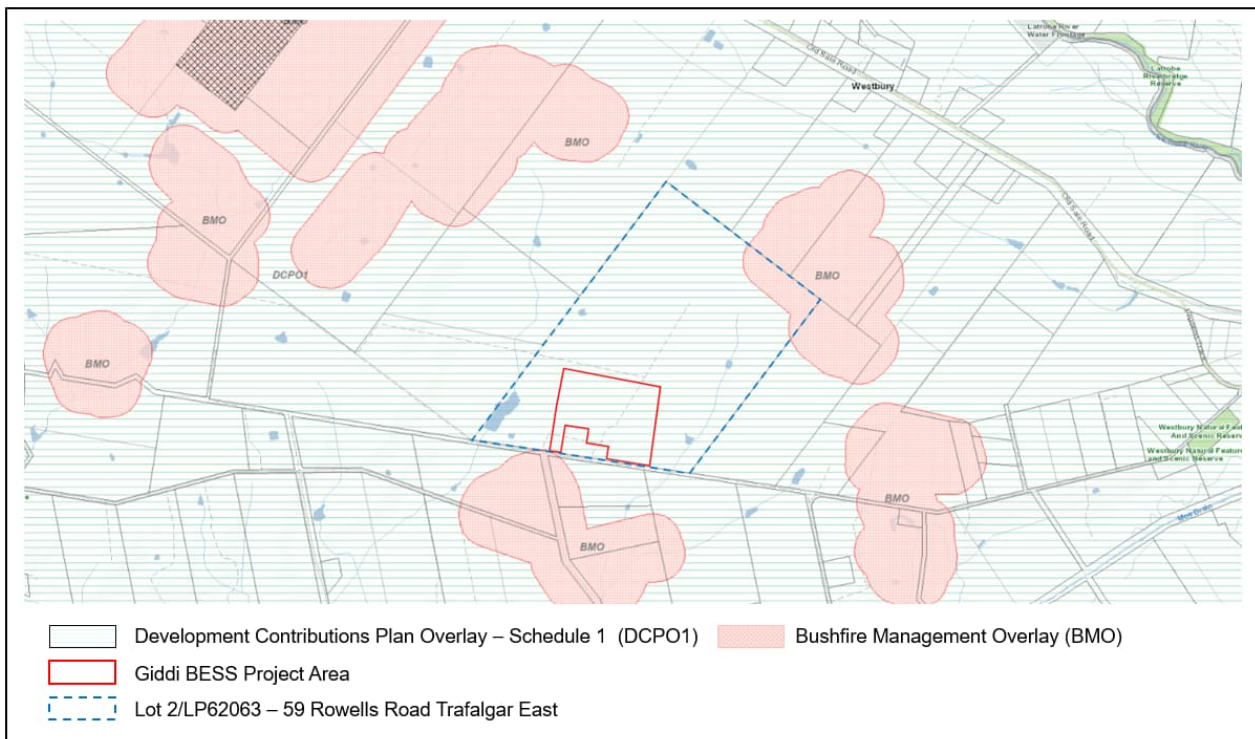


Figure 6-2 Planning overlays in relation to the site (DTP VicPlan, November 2025)

ADVERTISED PLAN

Table 6-5 Planning overlay permit requirements

Planning zone	Overlay requirement	Relevance
Clause 45.06 Development Contributions Plan Overlay – Schedule 1 Baw Baw Shire Development Contributions Plan	<p>The Plan applies to all land within the boundaries of the 63 areas designated in Baw Baw Shire Development Contributions Plan from area 1a to area 48.</p> <p>The Plan provides for different amounts of levy to be payable in specified areas, which are shown on the Plans to this Schedule, and in the <i>Baw Baw Shire Development Contributions Plan</i> (December 2023).</p>	<p>The project is located within designated area 48, which comprises all areas of Baw Baw Shire outside of Warragul and Drouin.</p> <p>In Area 48, the required contributions for Business and Industry are \$0.00.</p>

6.1.6 Particular and general provisions

Particular provisions are specific planning requirements for a range of identified uses and developments. They apply consistently across the State and are common to all planning schemes.

Particular and general provisions that have relevance to the Project are listed in Table 6-6 and Table 6-7 below:

Table 6-6 Particular provisions

Clause	Permit requirements	Relevance
52.06 Car Parking	<p>Under Clause 52.06-5:</p> <p><i>A permit is required to reduce (including reduce to zero) the number of car parking spaces required under Clause 52.06-5 or in a schedule to the Parking Overlay.</i></p>	<p>The use of land for a utility installation is not specified under Clause 52.06-5 and therefore 52.06-6 applies. The number of car parking spaces provided for the new use of land must be to the satisfaction of the responsible authority.</p>
52.17 Native vegetation	<p>Under Clause 52.17-1:</p> <p><i>A permit is required to remove, destroy or lop native vegetation, including dead native vegetation. This does not apply:</i></p> <ul style="list-style-type: none"> — <i>If the table to Clause 52.17-7 specifically states that a permit is not required.</i> — <i>If a native vegetation precinct plan corresponding to the land is incorporated into this scheme and listed in the schedule to Clause 52.16.</i> — <i>To the removal, destruction or lopping of native vegetation specified in the schedule to this clause.</i> <p><i>The requirement to obtain a permit does not apply to:</i></p> <ul style="list-style-type: none"> — <i>Grasses</i> 	<p>No removal of native vegetation is proposed. 52.17 does not apply.</p>

Clause	Permit requirements	Relevance
	<p><i>Native grass that is to be mowed or slashed for maintenance only, provided that the grass is:</i></p> <ul style="list-style-type: none"> — <i>located within a lawn, garden or other landscaped area; or</i> — <i>maintained at a height of at least 10 centimetres above ground level.</i> <p>— <i>Utility installations</i></p> <ul style="list-style-type: none"> — <i>Native vegetation that is to be removed, destroyed or lopped to the minimum extent necessary:</i> <ul style="list-style-type: none"> — <i>to maintain the safe and efficient function a Minor utility installation; or</i> — <i>by or on behalf of a utility service provider to maintain or construct a utility installation in accordance with the written agreement of the Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the Conservation, Forests and Lands Act 1987).</i> 	
<p>53.22 Significant Economic Development</p>	<p><i>The provisions of this clause prevail over any inconsistent provision in this planning scheme.</i></p> <p><i>This clause applies to an application under any provision of this planning scheme if the condition corresponding to a category in Table 1 is met.</i></p> <p><i>This clause does not apply to an application to subdivide land, other than an application to subdivide land that includes either:</i></p> <ul style="list-style-type: none"> — <i>A renewable energy facility; or</i> — <i>A utility installation used to:</i> <ul style="list-style-type: none"> — <i>Transmit or distribute electricity; or</i> — <i>Store electricity if the installed capacity is 1 megawatt or greater.</i> 	<p>A planning permit is required for a utility installation used to:</p> <ul style="list-style-type: none"> — Transmit or distribute electricity; or — Store electricity if the installed capacity is 1 megawatt or greater must be proposed. <p>As the proposed development is for a 360MW BESS, Clause 53.22 applies.</p> <p>Under this clause, the application is exempt from decision requirements of sections 64(1), (2) and (3), and the review rights of sections 82(1) of the Act.</p> <p>The project is also eligible for assessment under the Development Facilitation Program.</p>

ADVERTISED PLAN

Table 6-7 General provisions

Clause	Requirements	Relevance
<p>66.02-2</p> <p>Native vegetation</p>	<p><i>Kind of application:</i></p> <ul style="list-style-type: none"> — <i>To remove, destroy or lop native vegetation in the Detailed Assessment Pathway as defined in the Guidelines for the removal, destruction or lopping of native vegetation (Department of Environment, Land, Water and Planning, 2017).</i> — <i>To remove, destroy or lop native vegetation if a property vegetation plan applies to the site.</i> — <i>To remove, destroy or lop native vegetation on Crown land which is occupied or managed by the responsible authority.</i> <p><i>Referral authority:</i></p> <ul style="list-style-type: none"> — <i>Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the Conservation, Forests and Lands Act 1987)</i> <p><i>Type of referral authority:</i></p> <ul style="list-style-type: none"> — <i>Recommending referral authority</i> 	<p>No removal of native vegetation is required, referral of the application to DEECA is not required.</p>
<p>66.02-7</p> <p>Industry, utility installation or warehouse</p>	<p><i>Kind of application:</i></p> <p><i>To use land for an industry, utility installation or warehouse if any of the following apply:</i></p> <ul style="list-style-type: none"> — <i>A fire protection quantity is exceeded under the Dangerous Goods (Storage and Handling) Regulations 2012.</i> — <i>A notification is required under the Occupational Health and Safety Regulations 2017.</i> — <i>A licence is required under the Dangerous Goods (Explosives) Regulations 2011.</i> — <i>A licence is required under Dangerous Goods (HCDG) Regulations 2016 and the use is not associated with agriculture.</i> <p><i>Referral authority:</i></p> <ul style="list-style-type: none"> — <i>The Victorian WorkCover Authority</i> <p><i>Type of referral authority:</i></p> <ul style="list-style-type: none"> — <i>Determining referral authority</i> 	<p>As none of the listed items apply, the project does not require referral to the Victorian Workcover Authority.</p>

**ADVERTISED
PLAN**

ADVERTISED PLAN

6.1.7 Decision guidelines

In accordance with clause 65.01 of the BBPS, before deciding on an application or approval of a plan, the responsible authority must also consider relevant decision guidelines. These are outlined below in Table 6-8, and Table 6-9.

Table 6-8 BBPS Decision guidelines

Decision guideline	Assessment
The matters set out in section 60 of the Act.	This report has been written in accordance with the matters outlined in section 60 of the P&E Act.
Any significant effects the environment, including the contamination of land, may have on the use or development.	Significant effects to the environment are avoided through appropriate mitigations as outlined in the environmental assessment in Section 7.4.
The Municipal Planning Strategy and the Planning Policy Framework.	The Project is consistent with the Municipal Planning Strategy and PPF as outlined in Section 6.1.1 and Section 6.1.2.
The purpose of the zone, overlay or other provision.	Refer to Section 6.1 for discussion regarding zones, overlays and other provisions of the BBPS.
Any matter required to be considered in the zone, overlay or other provision.	Refer to Section 6.1 for discussion regarding zones, overlays and other provisions of the BBPS.
The orderly planning of the area.	The development of the Project on the site that is adjacent to an existing 220kV Transmission Line allows for a conglomeration of land uses and exhibits orderly planning within the area. Sufficient separation is provided for sensitive residential land uses, with the nearest residential receiver located ~1km to the south.
The effect on the environment, human health and amenity of the area.	As demonstrated through the technical assessments in Section 7, the Project can be undertaken without presenting adverse impacts on the environment or human health.
The proximity of the land to any public land.	The site is not located proximally to public land.
Factors likely to cause or contribute to land degradation, salinity or reduce water quality.	A groundwater and surface water assessment has been prepared to demonstrate that land degradation, salinity, or water quality will not be impacted by the Project. This is discussed in Section 7.6 and can be found in Appendix F (Flood Risk Assessment).
Whether the proposed development is designed to maintain or improve the quality of stormwater within and exiting the site.	A Flood Risk Assessment has been prepared to demonstrate that stormwater quality is unlikely to be affected by the proposal. This is discussed in Appendix F (Flood Risk Assessment).
The extent and character of native vegetation and the likelihood of its destruction.	The proposal does not require the removal of Native Vegetation.

ADVERTISED PLAN

Decision guideline	Assessment
Whether native vegetation is to be or can be protected, planted or allowed to regenerate.	The proposal does not require the removal of Native Vegetation.
The degree of flood, erosion or fire hazard associated with the location of the land and the use, development or management of the land so as to minimise any such hazard.	The site is not subject to flooding or erosion, and these have not been identified as areas of assessment in pre-application meetings with DTP and BBSC. Bushfire is a likely hazard, however, mitigations have been identified in Appendix E (Fire Risk Management Plan and Fire Safety Study). The project design has been prepared with consideration to the Design Guidelines and Model Requirements Renewable Energy Facilities v4, 2023. Refer to Section 7.5 for further information on the assessment of Fire Risk.
The adequacy of loading and unloading facilities and any associated amenity, traffic flow and road safety impacts.	The Traffic Impact Assessment (detailed in Appendix J) has determined that the site has suitable access to accommodate the proposed development and is unlikely to present adverse amenity, traffic flow, or road safety impacts on the local and wider road network.
The impact the use or development will have on the current and future development and operation of the transport system.	Once operational, the site is expected to generate minimal vehicle movements each week. This will present a negligible impact to the transport network.

Table 6-9 Farming Zone decision guidelines

Decision guideline	Assessment
General issues	
Any Regional Catchment Strategy and associated plan applying to the land.	The site sits within the West Gippsland Catchment Management Authority (CMA) and is subject to the West Gippsland Strategic Plan.
The capability of the land to accommodate the proposed use or development, including the disposal of effluent.	The land is suitable for the proposed use due to the adjacent land uses and the specialist assessments which are detailed further in Section 7
How the use or development relates to sustainable land management	The use of land for a BESS ensures an ongoing use to support sustainable energy generation that ties in with existing and proposed land uses in the area as described in Section 5.
Whether the site is suitable for the use or development and whether the proposal is compatible with adjoining and nearby land uses.	The site is suitable for the development of a BESS and is commensurate with adjoining land uses, including the 220kV Transmission Line.

Decision guideline	Assessment
How the use and development makes use of existing infrastructure and services	The Project will connect to existing transmission infrastructure.
<i>Agricultural issues and the impacts from non-agricultural uses</i>	
Whether the use or development will support and enhance agricultural production.	N/A
Whether the use or development will adversely affect soil quality or permanently remove land from agricultural production.	<p>The development of a BESS can be appropriately managed in a way that would not permanently remove the land from agricultural production.</p> <p>This could be through the development of the BESS on a concrete slab or platform, which could be removed and planted over once the BESS was decommissioned.</p> <p>Such details have not been identified at this stage of the Project and are likely to be addressed during once the detailed design and construction plan have been finalised.</p> <p>Refer to Appendix K for further information on the assessment of agricultural land impacts.</p>
The potential for the use or development to limit the operation and expansion of adjoining and nearby agricultural uses.	Although the proposed works are incompatible with agricultural use, the emerging character of the adjoining uses suggests that the conglomeration of energy generation infrastructure in the immediate area allows for the maximisation of agricultural land use opportunities elsewhere in the surrounds.
The capacity of the site to sustain the agricultural use.	N/A
The agricultural qualities of the land, such as soil quality, access to water and access to rural infrastructure.	The site has been previously cleared and possesses minimal agricultural quality.
Any integrated land management plan prepared for the site.	N/A
<p>Whether Rural worker accommodation is necessary having regard to:</p> <ul style="list-style-type: none"> — The nature and scale of the agricultural use. — The accessibility to residential areas and existing accommodation, and the remoteness of the location. 	<p>ADVERTISED PLAN</p>

ADVERTISED PLAN

Decision guideline	Assessment
The duration of the use of the land for Rural worker accommodation.	N/A
<i>Environmental issues</i>	
The impact of the proposal on the natural physical features and resources of the area, in particular on soil and water quality.	As demonstrated in Appendix F (Flood Risk Assessment), the Project will not present adverse impacts on the site's soil and water quality.
The impact of the use or development on the flora and fauna on the site and its surrounds.	The Project is not expected to impact any fauna, this is described in further detail in Section 7.2.
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.	N/A, The Project does not impact native vegetation or Flora/Fauna habitat.
The location of on-site effluent disposal areas to minimise the impact of nutrient loads on waterways and native vegetation	N/A
<i>Design and siting issues</i>	
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 development of the Project on the site that is adjacent to the 220kV Rowville to Yallourn Transmission Line allows for a conglomeration of land uses and maintains and preserves agricultural land use in the wider area.
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.	As demonstrated in Section 7.9, the project is anticipated to have minimal visual impact to sensitive receivers. Refer to Appendix L for further information on the assessment of landscape and visual impacts.
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 proposed works will be reflective of the existing character of the area, noting the proximity to the 220kV Transmission Line.

Decision guideline	Assessment
<p>The location and design of existing and proposed infrastructure including roads, gas, water, drainage, telecommunications and sewerage facilities.</p>	<p>The Project is appropriately sited to allow for the maximisation of existing and proposed infrastructure, being the 220kV Transmission line.</p> <p>The site also makes provision of key transport connections in the area, and does not require additional roadworks to facilitate the proposed project.</p>
<p>Whether the use and development will require traffic management measures.</p>	<p>Once operational, the site is expected to generate approximately six vehicle movements per week. This will present negligible impacts to the transport network.</p>
<p>The need to locate and design buildings used for accommodation to avoid or reduce noise and shadow flicker impacts from the operation of a wind energy facility if it is located within one kilometre from the nearest title boundary of land subject to:</p> <ul style="list-style-type: none"> — A permit for a wind energy facility; or — An application for a permit for a wind energy facility; or — An incorporated document approving a wind energy facility; or — A proposed wind energy facility for which an action has been taken under section 8(1), 8(2), 8(3) or 8(4) of the <i>Environment Effects Act 1978</i> 	<p>N/A</p> <p style="text-align: center;">ADVERTISED PLAN</p>
<p>The need to locate and design buildings used for accommodation to avoid or reduce the impact from vehicular traffic, noise, blasting, dust and vibration from an existing or proposed extractive industry operation if it is located within 500 metres from the nearest title boundary of land on which a work authority has been applied for or granted under the <i>Mineral Resources (Sustainable Development) Act 1990</i>.</p>	<p>N/A</p>

ADVERTISED PLAN

7 Environmental assessment

This section provides a summary of the project's environmental impacts and should be read in conjunction with the specialist assessments (enclosed in the Appendices, where applicable) that were undertaken in support of the project.

7.1 Agriculture

A summary of the potential impacts of the project on agricultural land is provided below, with further information included in an Agricultural Assessment, Technical Note (Appendix K).

Existing conditions

As noted in Section 2.1.2, the Project site is currently occupied by industrial scale sheds used by a goat dairy, and associated infrastructure, The goat dairy has approximately 4-5 employees.

Assessment

The Agricultural Assessment considered three main criteria for evaluating the agricultural impact of the Project, including:

- Quality of agricultural land
- Economic Evaluation and Relative Value to the Region and State, and;
- Strategic Importance of the land

In absence of specific guidance for the Development of BESS, the assessment has adopted the Solar Energy Facilities – Design and Development Guideline (DELWP, October 2022).

Table 7-1 Solar Energy Facility Guideline Considerations - Strategically Important Agricultural Land

Solar Energy Facility Decision Guidelines	Relevance to the Project
The impact on the loss of the site if it has high – quality soils, particularly soils that are niche to a type of crop or other agricultural activity	The site is classified as having moderate quality soils. The soils are suitable for grazing. They are not considered to be niche or desirable for high value horticultural crops.
The potential loss of reliable, accessible water (such as irrigated areas) and its impact at a local or regional scale	The site is not currently serviced by irrigation infrastructure because of the current use as a goat dairy and that the site is covered in sheds. The groundwater found on the remainder of the property is not a regulated irrigated water source but can easily be transferred to other properties on the large aquifer region. The impact at a local and regional scale is negligible.
The impact of fragmentation and a change of land use to non-agriculture activity on local and regional productivity and output	The area is only 0.006% of the agricultural land in the Baw Baw Shire. The impact of a change of land use is minimal in this circumstance. If multiple BESS sites are commissioned in the local region, the cumulative effect could have an impact on agriculture. The impact on productivity and output is not significant and will not have a notable impact on the region.
The impact of a change of land use on recent and/or current efforts to modernise and reform agricultural activity in the area	There are no recent and/or current efforts to modernise and reform agricultural activity in the area

ADVERTISED PLAN

Solar Energy Facility Decision Guidelines	Relevance to the Project
Whether the land has specifically been set aside or defined for agricultural use and development in a planning scheme or other strategic document	The Baw Baw planning scheme identifies the site location as being within a farming zone and has allowances for a Renewable energy facility (other than Wind energy facility) with a permit. There are no significant landscape overlays.
Whether the change in land use is to the detriment of a government’s previous or existing investment and support for the site or the area	There has not been any other investment or support for this site or area from the Governments that would experience a detrimental effect
Whether the proposed solar energy facility can co-locate with other agricultural activity to help diversify farm income without reducing productivity.	The proposed BESS is not suitable to co-locate with agriculture, however it will not impact on neighbouring agriculture.
The impact of the proposal on the protection of declared irrigation districts	The site is not in one of the protected declared irrigation districts set out in the VPP guidelines.

Conclusion

The Assessment has concluded that whilst the site has potential to remain agriculturally productive the proposed development of the land for a BESS is not expected to have a significant economic impact on agricultural production at the regional and state level.

7.2 Biodiversity

An examination of aerial photography (Google, 2025) shows that much of the Study Area and surrounding land appear to be predominantly cleared and utilised for farming and agricultural purposes.

Pre-1750 vegetation modelling indicates the site was historically dominated by Lowland Forest EVC 16 and contained patches of Swampy Riparian Complex EVC 126, and Riparian Scrub/Swampy Riparian Woodland Complex EVC 17.

A site assessment was undertaken by two WSP ecologists on 19 – 21 August 2025.

The site for the Giddi BESS contains infrastructure associated with its use as a goat dairy, such as industrial scale sheds and associated infrastructure. The land surrounding the site primarily consists of grassed paddocks with roaming cattle. The wider Study Area has predominately been revegetated or recolonised by flora species of indigenous, Australian native, and exotic origin. Remnant treed vegetation persists along the roadside of the Study Area boundaries (e.g. Rowells Road).

Two significant flora species were assessed to have at least a moderate likelihood of occurrence; multiple stands of both of these significant flora species were recorded from the wider Study Area however they were not recorded in the Giddi BESS site:

- Strzelecki Gum *Eucalyptus strzeleckii*– EPBC Act Vulnerable; FFG Act – critically endangered
- Green Scentbark *Eucalyptus fulgens* – FFG Act endangered.

Neither are likely to be impacted by Project works.

The fauna likelihood of occurrence assessment identified 12 significant fauna species with a moderate likelihood of occurrence, of which potential fauna habitat was identified for one species, the Growling Grass Frog (EPBC Act and FFG Act Vulnerable) in a ~1.88 ha farm dam within proximity (~180 m west) to the proposed Giddi BESS development. Targeted surveys were undertaken for the species during peak activity in December 2025 and January 2026. No Growling Grass Frogs were identified within the project site.

ADVERTISED PLAN

Similarly, potential fauna habitat was identified for the Giant Gippsland Earthworm (EPBC Act Vulnerable; FFG Act endangered) in farmland across the site. However, the potential suitable habitat occurs outside of the known distribution for this species; the Giant Gippsland Earthworm was consequently deemed a low likelihood of occurrence, and the species was not considered further.

No threatened ecological communities listed under the EPBC Act or FFG Act were identified during the site assessment.

No native vegetation was identified on the Giddi BESS site and no native vegetation clearance is required for the project.

7.3 Community Engagement

The Community Engagement Report (Appendix C) for the Project outlines a socially informed approach to guide communications and engagement activities. It includes a scoping of social impacts based on targeted engagement, secondary data research, and review of technical papers, as well as recommendations for managing these impacts and a high-level benefit-sharing framework.

The report supports the Project's application for planning and environmental approvals by ensuring engagement is evidence-based, inclusive, and responsive to the local community context. Developed through the collection and analysis of relevant socio-economic data from the local area, the strategy informs a targeted and appropriate engagement approach that reflects the needs, values, and expectations of the community.

Existing conditions

The Project is located in Trafalgar East within the Gippsland region. Trafalgar East is a small rural locality in the Baw Baw Shire, with a population of approximately 401 residents as of the 2021 Census. The area is characterised by its quiet, close-knit community, low population density, and strong connection to the natural environment. Agriculture, particularly cattle farming, is the primary industry, reflecting the area's rural character and economic reliance on farming activities.

Community Engagement Activities

The following Community Engagement activities have been carried out for the Giddi BESS project, to 27th March 2026.

Project Newsletter #1 and Door knocking: Distribution of a project newsletter to 27 properties in the area surrounding the project on 5th and 6th November 2025. As part of this process, the project team spoke directly with five neighbouring landholders to the Project site. If residents were not at their properties during door-knocking, a 'Sorry we missed you' contact card was left along with the project newsletter to make sure they were informed about the Project and upcoming engagement opportunities

Email, phone number and website for the project site: A dedicated project phone number 1800 739 274, email address, giddibess@ibvogt.com and website www.giddibess.com.au have been set up for the project.

Project Newsletter #2 and Newspaper advertisement: Distribution of a second newsletter occurred on 12th February 2026 to provide an update on the project and invitation for the planned Community drop in session on 24th February 2026. A Newspaper advertisement was placed in the Warragul and Drouin Gazette on 10th February 2026.

Community drop in session: A Community drop in session was held at the Trafalgar Public Hall on 24th February 2026. The session was attended by approximately 60 people, the majority of attendees living in Trafalgar, Trafalgar East, Westbury and Moe with others attending from Darnum and Yarragon. Key themes of the session related to impacts to Agricultural land use, Potential Fire risk and project location.

Attendees of the session who provided ib vogt with their contact details (email and/or phone) have been sent a link to updated frequently asked questions document, now available on the project website.

ADVERTISED PLAN

Project and Community benefit sharing survey: An online survey was created to collect feedback from the Community on the project, engagement to date and benefit sharing initiatives the Project can bring to the local area. The results of the survey have been included in the Community Engagement Outcomes Report, refer to Appendix C-1.

Ongoing engagement

The following engagement activity is planned for the project.

Project Newsletter #3: Distribution of a further project update to coincide with public exhibition of the project, providing instructions and the link for interested stakeholders to provide feedback to the Department of Transport and Planning.

Community Engagement Outcomes Report: A Community Engagement Outcomes Report has been prepared and presents a summary of engagement undertaken to date, community sentiment, results of the recent Project and Community benefit sharing survey, to guide further engagement with project stakeholders, refer to Appendix C-1.

Email, phone number and website for the project site: The dedicated project phone number 1800 739 274, email address, giddibess@ibvogt.com and website www.giddibess.com.au for the project will be continually monitored and updated as the project progresses.

7.4 Contaminated Land – Preliminary Site Investigation

To identify any current or historical contaminating activities at the site and immediate surrounding areas that may impact on approvals or site development a Preliminary Site Investigation was prepared by WSP (Appendix D, November 2025).

The assessment was completed in general accordance with current industry standards and with consideration of, but not limited to, the following guidelines:

- Environment Protection Amendment Act 2017.
- National Environment Protection (Assessment of Site Contamination) Measure (as amended 2013).
- Department of Environment, Land, Water and Planning Potentially Contaminated Land Practice Note 30, July 2021.
- Ministerial Direction No.1: Potentially Contaminated Land.

The assessment concluded that there is a medium potential for contamination within the proposed Giddi BESS area, from the current use of the land for chemical and fuel storage. The investigation has recommended that further soil and groundwater investigation could be undertaken to assess potential impacts.

7.5 Fire Risk

A Fire Risk Management Plan and Fire Safety Study has been undertaken for the project by Fire Risk Consultants (Appendix E).

In accordance with Victorian planning and fire service requirements for the project area, the design has been undertaken in accordance with the Country Fire Authority Guidelines – *Design Guidelines and Model Requirements – Renewable Energy Facilities* (CFA Guidelines, V4.4, June 2025), the Victorian Planning Provisions and the Baw Baw Planning Scheme.

The CFA Guideline also state that the NSW Planning’s *Hazardous Industry Planning Advisory Paper 2: Fire Safety Study Guidelines (2011)* should be utilised. The various requirements outlined within the Advisory Paper have been included with in the fire risk report.

The Giddi BESS has been assessed using a comprehensive fire risk management and safety framework, incorporating both national standards and site-specific considerations. The Fire Risk Management Plan (FRMP) and Fire Safety Study

(FSS) demonstrate that the proposed development meets the requirements of the *CFA Design Guidelines and Model Requirements for Renewable Energy Facilities*.

The risk assessment process assessed potential fire hazards common to the construction, commissioning and operation phases of the Giddi BESS development. In accordance with the risk frameworks outlined in the report, the residual risk profile (post-treatment) is considered to be low to moderate. This outcome reflects the robust design considerations and contemporary technology proposed for the project.

The project is well situated within the landscape to minimise the impact of fires entering or exiting the project area, with the broader landscape considered to have a normal bushfire risk profile for a grassland dominated, predominantly agricultural area.

The Fire Risk Management Plan provides a clear pathway for the safe development and operation of the BESS, detailing how fire risk is effectively managed throughout the life of the project.

7.5.1 Fire protection controls and mitigation measures

The proposed BESS system has a multi-level, automated approach to fire safety and suppression. The approach uses sensors to monitor battery behaviour and real time metrics, such as current, voltage, battery rack temperatures and the presence of combustible gas. The system can shut down automatically, electrically isolating faulty battery containers through the operation of contactors. The systems are designed for extreme safety, and meet industry standard tests including *UL9540A: Test Method for BESS*, which verify that no fire spreads outside the container.

These components are discussed in more detail below:

- **Intelligent Monitoring & Early Warning (BMS):** The Battery Management System (BMS) continuously monitors cell voltage, current, and temperature, identifying unhealthy batteries to prevent hazards. It can detect internal short-circuits and provide early warnings to reduce fire probability
- **Electrical Isolation (E-Stop):** Upon detection of a fire or critical fault, the system initiates an automatic E-Stop, which breaks the electrical circuit and isolates the battery racks to prevent the fire from spreading further. There is also a manual "Emergency Stop" button which can be pressed to activate the emergency isolation.
- **Passive Fire Protection:** CATL (the proposed BESS technology for the project) uses liquid cooling and non-flammable materials to prevent thermal propagation. For instance, the EnerC+ container includes a 24-hour uninterruptible power supply (UPS) for its fire suppression system, which operates even if the main power is lost.
- **Fire suppression** As an outdoor non-walk-in battery energy storage system, set of fire suppression system solutions with detection, explosion control and fire extinguishing functions. The fire extinguishing control strategy is divided into four levels:

In the unlikely event of a fire at the proposed facility, the following hierarchy of fire mitigation control measures are available at the site.

1 Alarm warning

Each BESS container has multiple sensors inside it to detect thermal runaway and fire events early. The sensors include temperature sensors inside the battery container, smoke detectors inside the container and the electrical compartment, as well as a gas detectors (H₂) inside the container.

The alarm would immediately notify the on-site operator of the fault. All detection signals are received and processed by the fire control panel, and the hydrogen (H₂) detector can be linked with the explosion-proof fan system (level 2).

**ADVERTISED
PLAN**

Refer to Figure 7-1 – which provides an extract from the CATL datasheet on the detector types:

No	type	quantity	remarks
1	Heat detector	2	Detection of temperature, in the battery room
2	Smoke detector	2+1	Detection of smoke particles, two in the battery room, and one in the electrical room
3	H ₂ detector	2	Detection of H ₂ , in the battery room
4	Fire control panel	1	Receive detector signals and control fire extinguishing system and explosion-proof system, in the electrical room

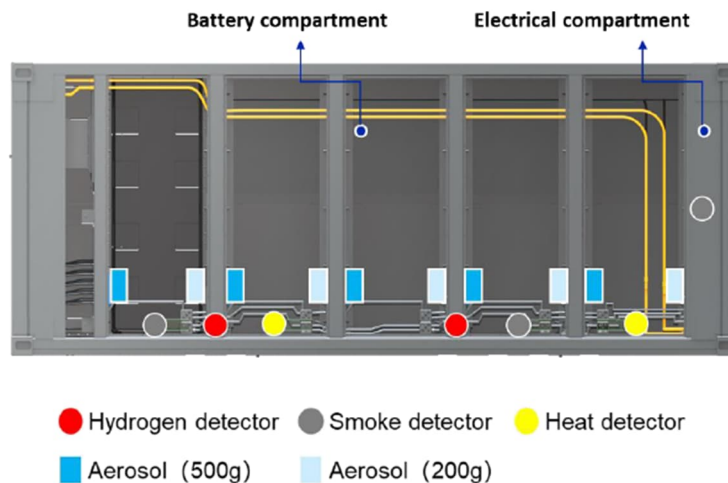


Figure 7-1 CATL Datasheet extract, Detector types

2 Ventilation and smoke exhaust to prevent deflagration.

Every container is fitted with an explosion proof fan system and louvers which operate automatically when the combustible gas concentration gets above a reasonable threshold.

3 Aerosol is released to extinguish the initial fire.

When an initial fire occurs in the battery room, a fire alarm signal will occur, and the fire extinguishing system will automatically control the release of aerosol (inert gas), which can also be triggered manually.

4 Dry pipe spraying to control the spread of fire.

As a last line of defence, the container is fitted with a dry pipe system to control the spread of a fire. As part of the Giddi BESS, we are installing a network of fire hydrants at 60m intervals which can be used in conjunction with the dry pipe system to control the spread of fire.

Lithium Iron Phosphate batteries do not contain metallic Lithium that reacts violently with water, as such water is often considered the best extinguishing agent for these fires because it has a high cooling capacity, which is used to prevent thermal runaway propagation.

Figure 7-2 provides a diagram of the dry pipe system installation

ADVERTISED
PLAN

ADVERTISED PLAN

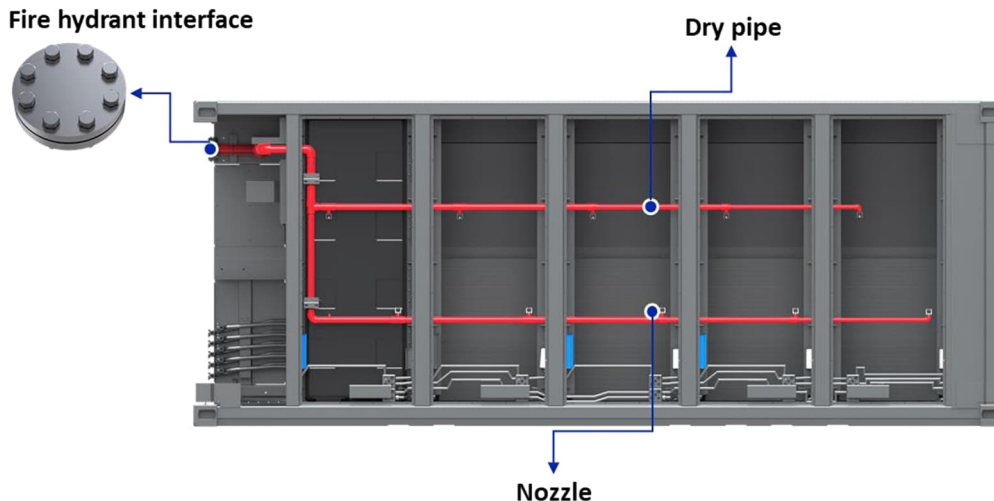


Figure 7-2 Dry pipe system configuration

In addition to the systems discussed above, the other components which make a BESS project, such as the inverters, power plant controller, internal reticulation and the HV substation also have levels of electrical isolation, redundancy and manual override opportunities built in.

Should a fault occur and the emergency alarm is activated (either automatically) or via the emergency stop buttons, the inverters have the capability to shut down and further isolate the batteries electrically. If further isolation is required, or as a precaution, the entire BESS facility can be isolated from the grid through opening the isolators and circuit breakers at the HV substation and switchroom. In an event where there is an emergency, the facility will switch over to backup emergency power provided through on site generators.

As a barrier to protect the environment from any possible contaminants, the battery containers have an internal bund, which is meant to contain any contaminated liquid used in fire suppression. However, should there be a physical breach, or the bund overflows, the site is proposed to incorporate retention basins lined with a geo-membrane. This would necessitate environmental cleanup of the site, but the contamination will be contained to the facility only. It is important to note that the retention basin is also not the first protection barrier, but rather an additional redundancy.

7.6 Flood and Hydrology

To define the existing flood conditions, a pre-development hydrology and flood study has been prepared by WSP (Appendix F). The assessment provides the following key information:

Characterise existing/pre-development (base case) flood conditions at the site area, including the floodplain extent, water levels and flow velocities for the 1% annual exceedance probability (AEP) event, with considerations of climate change.

Based on the modelled flow regime, identify suitable bench levels for the proposed BESS based on the 1% AEP plus selected climate change scenario and recommend high level flood mitigation measures.

The assessment concludes that:

- The 1% AEP pre-development flood depths across most of the site are generally shallow (<0.6m).
- Proposed development footprint is likely to intersect with natural overland flow paths, and therefore flood mitigation infrastructure may be required at future design stages.
- Indicative minimum bench levels should be set at least 600 mm above the estimated maximum pre-development 1% AEP flood levels.

- Overall, the results provide a conservative and suitable planning-level assessment to support the current planning application. Further post-development hydraulic modelling and stormwater management design will be required to confirm flood mitigation measures and the long-term resilience of the infrastructure at the proposed development.

The study has recommended that Post-development flood modelling should be undertaken once the final project layout and internal drainage design are available, and that a detailed drainage and stormwater management strategy be prepared. Engagement with West Gippsland CMA and the Baw Baw LGA, including submitting the post-development flood model for review, should continue through the detail design phase to provide alignment with regulatory expectations.

Additional information is available in Appendix F.

7.7 Geotechnical

A desktop geotechnical assessment has been prepared by WSP (Appendix G) to assess and comment on the key geotechnical risks associated with the proposed BESS development and provide a recommended scope for future site investigations to support detailed design.

According to the Geological Survey of Victoria (GSV) 1:50,000 Trafalgar geological mapsheet (8121-4 1st Edition, 1983), the mapped surface geology at the site is Tertiary age Haunted Hills Gravels (Tph).

The Haunted Hills Gravel unit typically comprises clay, sand and gravel in varying proportions, with typical compositions including gravelly clay or clayey sand. The material is described as ‘unconsolidated’ on the geological mapsheet and this is likely to refer to the material generally not having cemented to a rock strength material. The material is generally encountered as a ‘dense’ or ‘very dense’ sand or gravel or ‘hard’ clay, based on definitions in AS1726:2017 Geotechnical Site Investigations, and is occasionally encountered as a cemented material with ‘very low’ or ‘low’ rock strength.

The assessment notes that as footings for proposed infrastructure remain unknown at this stage, a site investigation is recommended to provide a more detailed assessment of the geotechnical conditions of the site and relevant design parameters.

7.8 Heritage

7.8.1 *Aboriginal Cultural Heritage*

Whilst the development of a BESS is defined as a ‘high impact activity’ under the Aboriginal Heritage Regulations 2018, The project is not located within an area of Aboriginal Cultural Heritage Sensitivity and therefore the preparation of a Cultural Heritage Management Plan (CHMP) is not mandatory under the Aboriginal Heritage Act 2006.

**ADVERTISED
PLAN**

ADVERTISED PLAN

ib vogn have elected to undertake a voluntary CHMP, Heritage Advisors, EMM Consulting have been engaged to prepare the voluntary CHMP in consultation with Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) who are the Registered Aboriginal Party for the project area and administer the CHMP process.



Figure 7-3 Location of mapped area of Aboriginal Cultural Heritage Sensitivity in relation to the site (Source: DTP VicPlan, November 2025)

The CHMP process is ongoing, and is proposed to include a desktop and standard level assessment, with field investigations to commence in January 2026.

7.8.2 Historic Heritage

A Historical Heritage assessment was prepared by EMM Consulting (Appendix H) to evaluate the potential archaeological resources of the study area and comprised a desktop assessment and field survey.

The assessment included searches of the following registers and databases to identify previously recorded heritage places within the study area.

Commonwealth: World Heritage List; National Heritage List; Commonwealth Heritage List

State: Victorian Heritage Inventory (VHI), Victorian Heritage Register (VHR), Victorian Way Heritage Inventory

Local: Local council Heritage Overlay (Baw Baw Shire Council), local council planning scheme (Baw Baw Shire Council)

Non-Statutory: Register of the National Estate; National Trust Register.

No registered places or archaeological sites were identified within the Project Area.

A field survey to assess the historical heritage landscape of the study area was conducted on 12 November 2025. The aims of the historical heritage field survey were to:

- Validate the findings of the desktop assessment
- Record features of interest that may have historical heritage significance and would therefore require management within the study area.

No historical places, objects, or areas of historical archaeological potential were identified during the pedestrian survey.

7.9 Landscape and Visual

The Landscape and Visual Impact Assessment has been prepared by Iris Visual Planning and Design (Iris) (Appendix L) to consider landscape and visual amenity values.

As there are no specific legislative requirements for landscape and visual impact assessment in Australia, the assessment has adopted the following professionally accepted national and international guidelines:

- Guidance Note for Landscape and Visual Assessment (GNLVA), Australian Institute of Landscape Architects (2018)
- Guidelines for Landscape and Visual Impact Assessment, the UK Landscape Institute and the Institute of Environmental Management and Assessment (2013).
- In addition, the assessment of impact to the landscape at night is guided by *AS4282: Control of the obtrusive effects of outdoor lighting* (Standards Australia, 2023).

The assessment of impact to landscape values is based on identifying the ‘sensitivity’ of the landscape and the ‘magnitude of change’ caused by the Project. These two are then combined to assign an overall level of landscape impact.

The Landscape and Visual impact assessment concluded that the landscape sensitivity and magnitude of change from the proposal is low, and the proposed substation and BESS would be relatively discrete in the landscape, located between the transmission line and adjacent tree-lined local roads. An image of the existing view and a visualisation of the proposed Project looking west from Millers Road are provided in Figure 7-4 and Figure 7-5 below.

Additional photomontages are available within Appendix L.



Figure 7-4 View west from Millers Road (Existing)

**ADVERTISED
PLAN**

ADVERTISED PLAN



Figure 7-5 View west from Millers Road (Proposed Giddi BESS)

7.10 Noise and Vibration

To assess potential for operational noise impact, an assessment has been undertaken by WSP (Appendix I). The following legislation and documents guide the acceptability of industrial noise within Victoria and were used to guide this assessment:

- Environmental Protection Act 2017: General Environmental Duty
- EPA Publication 1826.5: Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises and entertainment venues (Noise Protocol)
- EPA publication 1997: Technical Guide: Measuring and analysing industry noise and music noise

Noise Limits and Assessment

The predicted operational noise assessment (including adjustments for tonal characteristics) for Stage 1 compared the cumulative predicted noise levels from the site against the EPA 1826.5 limits to assess compliance. This resulted in the following calculation of noise limits for the Project, shown in Table 7-2.

Table 7-2 Reduced noise limits to account for cumulative noise (Appendix I)

NSA	Reduced EPA 1826 noise limits, dBA		
	Day	Evening	Night
R4, R5, R6	42	36	31
All other NSA	45	39	34

The predicted operational noise assessment (including adjustments for tonal characteristics) for Giddi BESS is shown in Table 7-3. A comparison of the cumulative predicted noise levels from the site have then been compared against the EPA 1826 limits to assess compliance.

Table 7-3 Giddi BESS Noise Assessment Result (Appendix I)

NSAs	Predicted noise level, L_{eq} dBA			Tonal noise character adjustment, L_{eq} dBA			Effective noise level, L_{eff} dBA			EPA 1826 limits ¹ , dBA			Complies?		
	D	E	N	D	E	N	D	E	N	D	E	N	D	E	N
R1	35	35	29	0	0	2	35	35	32	45	39	34	Yes	Yes	Yes
R2	30	30	25	0	0	0	30	30	18	45	39	34	Yes	Yes	Yes
R21	32	32	27	0	0	0	32	32	22	45	39	34	Yes	Yes	Yes
R24	34	34	28	0	0	0	34	34	17	45	39	34	Yes	Yes	Yes

ADVERTISED PLAN

Results

Predicted noise levels at all identified noise-sensitive areas comply with the applicable EPA 1826 noise limits for day, evening, and night periods.

Mitigation options have been explored, including source noise attenuation for the inverter, which has been determined as the best practicable option for noise mitigation.

7.11 Traffic

To assess potential traffic and transport impacts, an assessment has been undertaken by WSP (Appendix J).

The traffic impact assessment discusses the traffic implications of the proposed development, including an assessment of the estimated site generated traffic movements, both during construction and under general operational conditions. In conjunction with this, the report has also been prepared to discuss the suitability of the identified site access arrangements and the ability of this arrangement to adequately cater for the traffic demands of the site during peak construction stages.

In the preparation of this assessment, the following documents have been considered:

- Austroads Guide to Road Design
- Department of Transport and Planning (DTP) Supplements to Austroads
- Baw Baw Planning Scheme
- DELWP – Solar Energy Facilities – Design and Development Guidelines – October 2022

A summary of the proposal and preceding traffic assessment is provided as follows:

Construction of the site will take approximately 20 months, during which time a peak workforce of 145 staff is expected.

During peak construction the proposed development of the site is anticipated to generate in the order of 88 daily vehicle movements comprising:

- 68 light vehicle movements.
- 20 heavy vehicle movements.

Giddi BESS site access is to be facilitated via Rowells Road and Access A and B. Whilst these access arrangements already are adequate to accommodate a B-Double truck, some consideration may be warranted in relation to upgrading the road surface along Rowells Road on approach and also at the Heartsridge Road intersection to cater towards the volume of construction vehicles travelling this path.

Traffic volumes as generated by the site during peak construction are anticipated to be adequately accommodated within the wider surrounding road network with minimal change to existing operations and functionality, noting the generated volumes do not trigger a need to upgrade existing intersections based on turn warrant treatment thresholds.

Heavy vehicle movements up to the size of a 26.0m B-Double are already accommodated within sections of the road network leading to the subject site and as such, it is not anticipated that there will be any requirement to provide any significant modifications to the road network to continue to accommodate these movements during the sites construction.

Based on access to surrounding farmland during the construction of Giddi BESS it is expected that there will be ample room to facilitate vehicle circulation and parking for construction staff within the site for the duration of works.

Based on the preceding assessment, the proposed site development is considered appropriate from a traffic engineering perspective given surrounding conditions and the nature of the development.

8 Conclusion

This report has been prepared in support of an Application for a Planning Permit for:

- The use of land for a utility installation in accordance with Clause 35.07-1
- Buildings and works for a utility installation in accordance with Clause 35.07-4
- Earthworks which change the rate of flow or the discharge point of water across a property boundary in accordance with the Schedule to Clause 35.07

This report has described ib vogt's proposed BESS development at the site and the potential environmental and amenity impacts of the project. The project is consistent with the purpose of the relevant zones and overlays and the objectives of the relevant planning policies of the BBPS.

The project has been designed in consideration of the surrounding community, environment and other land uses and is considered appropriate for the following reasons:

- The project will contribute to the emerging character of the site and surrounds as a renewable energy hub through effective land use planning, whilst enabling the rural and agricultural character of the wider area to be maintained. Including;
 - immediate access to existing high capacity transmission infrastructure, removing the requirement for new transmission lines
 - good separation from nearest neighbours, with the closest neighbour being approximately 1km away,
 - the Project footprint is largely utilising heavily disturbed flat land currently hosting industrial scale sheds, and associated agricultural infrastructure. Accordingly there are minimal visual or environmental impacts from the Project.
 - location at the end of a cul de sac, meaning that there are very limited traffic volumes passing the site or with views over the site, along with mature roadside vegetation that provides visual screening.
- The project has been informed by a number of technical investigations and consultation with key stakeholders including DTP, DEECA, FRV, ESV, and the BBSC.
- A key consideration of the project design has been the avoidance and minimisation of potential environmental, landscape and amenity impacts, whilst ensuring the project can effectively service energy storage requirements.

Overall, the assessments undertaken demonstrates that the project represents an appropriate land use and developmental outcome, with respect to relevant planning controls and the site's context, and therefore it is respectfully requested that approval is granted for this permit application.

**ADVERTISED
PLAN**

9 Limitations

This Report is provided by WSP Australia Pty Limited (*WSP*) for ib vogt Development Australia Pty Ltd (*Client*) in response to specific instructions from the Client and in accordance with WSP's proposal dated 6 June 2025 and agreement with the Client dated 7 August 2025 (*Agreement*).

9.1 Permitted Purpose

This Report is provided by WSP for the purpose described in the Agreement and no responsibility is accepted by WSP for the use of the Report in whole or in part, for any other purpose (*Permitted Purpose*).

9.2 Qualifications and Assumptions

The services undertaken by WSP in preparing this Report were limited to those specifically detailed in the Report and are subject to the scope, qualifications, assumptions and limitations set out in the Report or otherwise communicated to the Client.

Except as otherwise stated in the Report and to the extent that statements, opinions, facts, conclusion and / or recommendations in the Report (*Conclusions*) are based in whole or in part on information provided by the Client and other parties identified in the report (*Information*), those Conclusions are based on assumptions by WSP of the reliability, adequacy, accuracy and completeness of the Information and have not been verified. WSP accepts no responsibility for the Information.

WSP has prepared the Report without regard to any special interest of any person other than the Client when undertaking the services described in the Agreement or in preparing the Report.

9.3 Use and Reliance

This Report should be read in its entirety and must not be copied, distributed or referred to in part only. The Report must not be reproduced without the written approval of WSP. WSP will not be responsible for interpretations or conclusions drawn by the reader. This Report (or sections of the Report) should not be used as part of a specification for a project or for incorporation into any other document without the prior agreement of WSP.

WSP is not (and will not be) obliged to provide an update of this Report to include any event, circumstance, revised Information or any matter coming to WSP's attention after the date of this Report. Data reported and Conclusions drawn are based solely on information made available to WSP at the time of preparing the Report. The passage of time; unexpected variations in ground conditions; manifestations of latent conditions; or the impact of future events (including (without limitation) changes in policy, legislation, guidelines, scientific knowledge; and changes in interpretation of policy by statutory authorities); may require further investigation or subsequent re-evaluation of the Conclusions.

This Report can only be relied upon for the Permitted Purpose and may not be relied upon for any other purpose. The Report does not purport to recommend or induce a decision to make (or not make) any purchase, disposal, investment, divestment, financial commitment or otherwise. It is the responsibility of the Client to accept (if the Client so chooses) any Conclusions contained within the Report and implement them in an appropriate, suitable and timely manner.

In the absence of express written consent of WSP, no responsibility is accepted by WSP for the use of the Report in whole or in part by any party other than the Client for any purpose whatsoever. Without the express written consent of WSP, any use which a third party makes of this Report or any reliance on (or decisions to be made) based on this Report is at the sole risk of those third parties without recourse to WSP. Third parties should make their own enquiries and obtain independent advice in relation to any matter dealt with or Conclusions expressed in the Report.

9.4 Disclaimer

No warranty, undertaking or guarantee whether expressed or implied, is made with respect to the data reported or the Conclusions drawn. To the fullest extent permitted at law, WSP, its related bodies corporate and its officers, employees and agents assumes no responsibility and will not be liable to any third party for, or in relation to any losses, damages or expenses (including any indirect, consequential or punitive losses or damages or any amounts for loss of profit, loss of revenue, loss of opportunity to earn profit, loss of production, loss of contract, increased operational costs, loss of business opportunity, site deprecation costs, business interruption or economic loss) of any kind whatsoever, suffered on incurred by a third party.

**ADVERTISED
PLAN**