

**LEVEL 10
477 COLLINS STREET
MELBOURNE VIC 3000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

3 March 2023

Marty Vahala
Manager, Development Approvals and Design, Renewables
The Department of Transport and Planning, formerly the Department of Environment,
Land, Water and Planning

Dear Marty,

RFI AND REFERRAL RESPONSE LETTER PLANNING PERMIT PA2201886

1. INTRODUCTION

Urbis continues to act on behalf of the permit applicant with regards to the above-mentioned planning application seeking to construct and operate a renewable energy facility at 1000 Little River-Ripley Road, Little River.

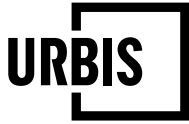
We write in response to the Departments request for further information (RFI) dated 28 November 2022. This letter also seeks to address referral comment received by the following authorities:

- Department of Energy, Environment and Climate Action – Barwon South West
- City of Greater Geelong Council
- Country Fire Agency (CFA)
- Secretary of DELWP
- The Country Fire Authority

We enclose the following documentation to assist the Department in their assessment of the application:

Requested information:

- Regional Context Plan prepared by Urbis, dated February 2023
- Location Plan prepared by Urbis, dated February 2023
- Updated Landscape strategy prepared by Urbis, dated 22 February 2023
- Updated Signage plans prepared by Urbis, dated February 2023
- Updated planning Report prepared by Urbis, dated March 2023
- Updated Noise Assessment prepared by NDY, dated 15 February 2023



- Photos - Habitat zones and Trees (all veg being removed and retained)
- Materials and Finishes Schedule prepared by Urbis, dated February 2023
- Updated Flora and Fauna Assessment prepared by Biosis, dated 27 February 2023
- Native Vegetation Removal Report prepared by DEECA, dated 28 February 2023
- Typical Access to Rural Properties drawing prepared by Urbis, dated February 2023
- Heritage overlay maps prepared by Urbis dated February 2023

Amended Documents:

- Amended Planning Permit Application form
- Amended site plans and elevations prepared by Urbis dated 24th February 2023

PROPOSED AMENDMENTS

In order to address the issues raised within the departments RFI letter, the following amendments have been made to the proposal:

- Reconfiguration of PV solar layout in order to conserve 27 existing scattered trees and 5 patch trees.
- Addition of noise reduction infrastructure

2. RESPONSE TO INFORMATION REQUIRED

The following itemised table outlines the responses to the items requested.

Item	Further information requested	Response/ Reference
1.	Confirmation regarding whether business identification signage is proposed as part of this application. If permission is being sought for the erection of business identification signage, the application form will need to be amended accordingly.	We confirm permission is sought for business identification signage. Please see attached an updated permit application form as requested.
2.	Updated plans to address the following:	Please refer to the updated site plans prepared by Urbis dated 24 February 2023 as follows:
i.	Clearly dimensioned plans. Given the scale of the development, it may be prudent to separate the plans into multiple sections (in addition to the entire site plan) and provide additional magnified plans.	Please refer to additional site plans 300-SO, 301-SO and 302-SO which have been prepared as separate detailed site plans convenience.

Item	Further information requested	Response/ Reference
ii.	Location of any new poles associated with the new connection to powerline.	Please refer to site plan 302, noting the underground connection from the BESS to the substation and the location of the poles for the Overhead connection from the substation to the power line where the site point of connection to the grid is situated
iii.	Details/layout of all proposed ancillary infrastructure, including internal cable routes, firefighting infrastructure, laydown area, internal tracks, car parking etc. including measures as stipulated in the CFA's Guidelines for Renewable Energy Installations (2021)	<p>The following ancillary infrastructure has been included within the updated site plans:</p> <ul style="list-style-type: none"> – Water tanks – Acoustic sound barriers – Inverters – Fences – Internal roads – Underground power cable connection between the BESS and Substation. – All internal cable routes will follow access tracks or are located within the tracker installation area. – Car parking within the construction staging area <p>We note, all the requirements specified in the CFA's Guidelines for Renewable Energy Installations (2021) are included in the design as details in the Fire Risk Assessment.</p>
iv.	Depiction of property boundaries and formal identification and addresses for other lots.	<p>Please refer to the 'Titles' map provided in Appendix E, which shows titles within the site and in surrounding properties.</p> <p>We note the updated site plan also indicates the external property boundaries as necessary.</p>
v.	Clearly identify all native and non-native vegetation, and whether the native vegetation is to be retained or removed.	Please refer to the provided survey plan at appendix B identifying all native and non native vegetation on-site. This includes planted trees, mapped shrub species (technically not trees), weed species and some non-indigenous trees.

Item	Further information requested	Response/ Reference
		Importantly, the revised site plan has been updated to show all native vegetation to be retained and removed.
vi.	For native vegetation to be retained, show the Tree Protection Zones (calculated in accordance with AS4970) if works are proposed within 30m of the tree.	<p>The site plan has been updated to include TPZs for all native vegetation to be retained, calculated in accordance with AS4970.</p> <p>We note, a maximum of up to 15m buffering has been provided to all retained patch vegetation.</p>
vii.	A site context plan similar to the “location plan” shown inset on the submitted development plans showing surrounding characteristics, boundaries and formal identification of neighbouring properties, sensitive uses and other significant features (e.g. native vegetation to be retained/removed) to accurately describe the site and surrounding area.	Please refer to the Regional Context Plan prepared by Urbis in response to the Departments comments.
viii.	A plan showing all dwellings within 1km of the project area, noting the distance from the nearest proposed infrastructure.	Please refer to the Regional Context Plan prepared by Urbis in response to the Departments comments.
ix.	Dimensioned setbacks of all infrastructure from facility and title boundaries.	Site plans have been updated to show dimensioned setbacks of all infrastructure from title boundaries.
x.	Title boundaries of the subject site and neighbouring land clearly shown on plans.	Site plans have been updated to show title boundaries of the subject site. Please refer to the ‘Titles’ map provided in Appendix E for adjoining title information.
xi.	Include schedule of proposed materials and finishes, including all external finishes associated with the	Please refer to the provided materials and finishes schedule prepared by Urbis dated 17 February 2022

Item	Further information requested	Response/ Reference
	proposed infrastructure and fencing detail.	
xii.	The location of any proposed landscaping.	<p>Planting generally in accordance with the Landscape Strategy has been show on the revised site plan.</p> <p>Noting it is our expectation that a detailed landscape will be submitted subject to permit conditions, post the issuance of a permit.</p>
xiii.	Location of proposed signage.	Please refer to the updated site plan showing the location of proposed business identification signage onsite.
xiv.	Details of any mitigation measures recommended in assessment reports shown on the plans.	<p>The site plans have been updated in accordance with all recommended mitigation measures. These include:</p> <ul style="list-style-type: none"> – Vegetive screening – Fire safety infrastructure – Noise abatement – Vegetation retention and removal – Carparking and roads
xv.	Update indicative business signage plan, to make reference to Category 4 signage controls at Clause 52.05-14.	Signage plans have been updated to make reference to the correct Category 4 signage controls at Clause 52.05-14.
3.	Should the application seek permission to erect business identification signage, the town planning report would need to be updated to include an assessment against Clause 52.05 of the Greater Geelong Planning Scheme.	<p>The town planning report has been updated to include a response to the decisions guidelines of Clause 52.05-8 of the Greater Geelong Planning Scheme.</p> <p>Please refer to Section 7.5.3 of the updated planning report prepared by Urbis dated February 2023.</p>

Item	Further information requested	Response/ Reference
4.	An approved Cultural Heritage Management Plan. Noting the findings of the desktop cultural heritage assessment and draft Cultural Heritage Management Plan indicate Aboriginal cultural heritage to be present within the activity area.	The CHMP Desktop and Standard assessment has been completed. The complex assessment is currently underway with field work expected to be complete by the end of March and CHMP approved by the end of April.
5.	Confirmation regarding the number of static water tanks proposed. Noting the town planning report refers to 6 water tanks (each comprising 45,000L) whilst the fire risk assessment report and plans refer to the provision of 7 static water tanks (total of 315,000L) as part of the proposal.	The number of static water tanks referred to in the town planning report has been updated to 7 in accordance with the fire risk assessment.
6.	Updated Landscape Strategy, which provides greater clarity in relation to the specific species proposed to be planted for each of the referenced planting typologies.	Please refer to the updated planting schedules and typologies in the provided landscape strategy prepared by Urbis.

3. REFERRAL RESPONSE TO SECRETARY OF DELWP

Pursuant to Section 55 of the Planning and Environment Act, 1987, the Secretary of DELWP has requested the following information:

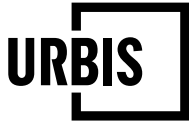
Item	Further Information Requested	Response
1.	An amended avoid and minimise statement, The statement must describe any efforts to further avoid the removal of and minimise the impacts on biodiversity and other values of native vegetation, and how these efforts focussed on areas of native vegetation that have the most	<p>Please refer to Section 5.1 of the updated flora and fauna Assessment prepared by Biosis, dated February 2023.</p> <p>(a), (b) In regard to site selection the developer needed to find land for lease that had access to the 220kv powerlines that run across the site to connect to the grid. Noting this they started engaging with nearby landowners from 2019. At</p>

Item	Further Information Requested	Response
	<p>value. The statement should include a description of the following:</p> <p>(a) Strategic level planning - any regional or landscape scale strategic planning process that the site has been subject to that avoided and minimised impacts on native vegetation across a region or landscape.</p> <p>(b) The site selection process, indicating how the proposed development of a highly vegetated site can be reconciled with the requirement to avoid loss of native vegetation.</p> <p>(c) Site level planning - how the proposed use or development has been sited or designed to avoid and minimise impacts on native vegetation.</p> <p>(d) That no feasible opportunities exist to further avoid and minimise impacts on native vegetation without undermining the key objectives of the proposal.</p>	<p>this time they canvassed all landowners on all land adjacent to the current site boundaries (as well as the existing site boundaries). Given the large capacity a minimum of 550ha of developable land was required to make the site economically viable. Noting land would be lost to factors such as:</p> <ul style="list-style-type: none"> - Native Vegetation - Cultural Heritage - Land features (water ways etc) - Easements - High gradient land - Land unsuitable for construction (i.e. shallow rock) <p>They knew they would need a larger area to accommodate these constraints. The developer after engaging for 2 years with landowners secured the 7 parcels of land for this site which make up 735ha (of which only 505ha can be developed noting the above constraints). Although less can be developed that originally required if the developer is willing consider this as this is on the threshold of what can be considered economically viable and this may be enough land dependent of types of panels or size of BESS that can be incorporated. These technologies which would make all the difference in achieving the aimed MW capacity would be known at the time of construction. The developer is willing to undertake this risk to ensure the site goes into operation but achieves its net nature and environment (both ecology and in terms of carbon emissions) goals.</p> <p>Reasons nearby land was unable to be leased included:</p> <ul style="list-style-type: none"> - Owners not interested due to seeking to sell or rezone land for future residential. - Surrounding Land use zoning including the Rural Conservation Zone earmarked for - Land being land banked by overseas corporation for rezoning or land being incorporated into Melbourne Growth Areas

Item	Further Information Requested	Response
		<p>(c) The site has undergone several design iterations where knowledge of the site was improved, in particular the locations of key ecological features such as habitat for threatened species, locations of FFG Act listed trees and FFG Act and EPBC Act listed threatened ecological communities. Further detail on the avoidance of native vegetation removal and the planning permit design process please refer to section 5.1.2 of the Biosis report.</p> <p>As discussed below, following discussion with the Department on the 15 December 2022, the proposal has undergone significant reduction in the number of panels in order to preserve a greater number of scattered trees onsite (27 scattered and 5 patch trees).</p> <p>In the design presented in the original Planning Permit application, 97 of the 187 scattered trees and 10 of the 38 patch trees were identified for removal. In the current design, scattered tree impacts have been reduced to 70 trees and patch reduced to 5 trees. This equates to 33% of all the trees mapped within the study area (reduced from 47% of all the trees).</p> <p>(d) At this stage, no feasible opportunities exist to further avoid and minimise impacts on native vegetation without undermining the key objectives of the proposal. Any further reduction in development area would render the project economically unviable and the project would not be able to proceed.</p>
2.	Recent dated photos of all the native vegetation proposed to be removed. The photos provided with the current application material are limited and general in nature. They also include photos of native vegetation to be retained. Photos of all vegetation	Please refer to the photos (VQA_01-VQ_34) provided by Biosis, indicating all native vegetation proposed to be removed.

Item	Further Information Requested	Response
	<p>proposed to be removed must be provided, including the patch vegetation. Photos of groups or clusters of trees are acceptable if it is clear which will be removed.</p>	
3.	<p>The application requirements detailed in Clause 4.0 of Schedule 4 to the Environmental Significance Overlay in the planning scheme, in full. This includes, but is not limited to:</p> <p>(a) Information about impacts on rare or threatened species habitat, including:</p> <ul style="list-style-type: none"> (i) The relevant section of the Habitat importance map for each rare or threatened species requiring a species offset. (ii) The species' conservation status for each rare or threatened species that habitat is proposed to be removed for. (iii) The proportional impact of the removal of native vegetation on the total habitat for that species (e.g. whether their habitats are highly localised habitats, dispersed habitats, or important areas of habitat within a dispersed species habitat). <p>(b) A follow up vegetation survey in spring/summer to determine the extent and the quality of native vegetation patches more accurately in the study area. It is recommended that the grass is not slashed or grazed in the months leading up to spring/summer vegetation surveys to assist with the identification of any native vegetation on the site.</p>	<p>a) Detailed information regarding impacts to rare or threatened species habitat is not required under Clause 4.0 of Schedule 4 to the Environmental Significance Overlay.</p> <p>However, we note, the study area is predominantly on private land, does not contain any declared 'critical habitat' for the purposes of the FFG Act and the flora species within the site are not being taken for the purpose of commercial sale.</p> <p>b) The study area was assessed in summer and autumn, which is within the preferred seasonal time for survey of grassy vegetation.</p> <p>c) Please refer to section 5.1.5 of the Biosis report for a description potential ground disturbance due to the proposal.</p> <p>d) It is our expectation that a Land and Environment Management Plans will be submitted prior to the commencement of works as a condition to any planning permit granted for the development.</p> <p>This allows for final detailed design changes to occur prior to the issuance of a permit to without the need to unnecessarily update supporting management plans, specifically related to vegetation removal.</p>

Item	Further Information Requested	Response
	<p>(c) A description of any proposed disturbance of surface soil or rocks associated with the proposal.</p> <p>(d) A land and environmental management plan, including:</p> <ul style="list-style-type: none"> (i) Any proposals for revegetation, including proposed species, and ground stabilisation. (ii) How any vegetation removal will be offset. (iii) Weed management, including species to be targeted and proposed management techniques. (iv) Pest animal management, including species to be targeted and proposed management techniques. 	
4.	<p>Identification of any culturally significant trees to be removed or protected.</p>	<p>Three scarred trees were recorded at the site one on Granite Hills and 2 on flood plains. The location of these are identified in Appendix I Cultural; Heritage Standard Assessment. No development is proposed to occur within 20m of these trees including their removal</p>
5.	<p>An offset statement providing evidence that an offset that meets the offset requirements for the native vegetation to be removed has been identified and can be secured in accordance with the Guidelines for the removal, destruction or lopping of native vegetation (DELWP, 2017). A suitable statement includes evidence that the required offset:</p> <p>(a) can be met by a first party offset, either partially or fully,</p>	<p>Please refer to the proposed offset strategy at section 5.5 of the Biosis report.</p> <p>We note, the offset target for the current proposal will be achieved via a third-party offset.</p> <p>Biosis are currently undertaking a review of the Native Vegetation Credit Register via Veglink to determine availability of the required credits for purchase from a native vegetation credit owner. Evidence that the required offset is available will be provided separate from this response.</p> <p>Noting, the required offset would be secured following approval of the application to remove</p>



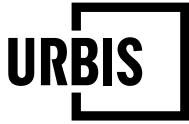
Item	Further Information Requested	Response
	(b) will be established as a new offset and has the agreement of the proposed offset provider, or (c) is available to purchase from a third party.	native vegetation and in accordance with the Guidelines all offsets will be secured prior to the removal of native vegetation.

3.1. CITY OF GREATER GEELONG

Pursuant to Section 55(2) of the Planning and Environment Act, 1987, the City of greater Geelong has requested the following information:

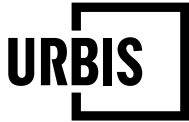
Item	Further Information Requested	Response
1.	A revised site plan clearly identifying the proposed solar panel areas and locations of proposed signage.	Please refer to the revised site plan prepared by Urbis dated February 2023
2.	Clarification the proposed signage is not prohibited. This area (farming zone) has maximum limitation and is identified as Category 4 – Sensitive areas, where Business identification signage must not have a total display area to each premises that exceeds 3sqm.	The proposed signage is in accordance with the requirements as outlined in the Zone as well as the Victorian Planning Scheme’s Particular Provisions (Clause 52.05-8 Decision Guidelines). Please refer to section 7.5.3 of the town planning report prepared by Urbis dated February 2023.
3.	The revised site plan to also include the extent of the overlays HO294 and HO295.	Please refer to the revised site maps indicating the extent of heritage Overlays HO294 and HO295.
4.	Confirmation that the proposed solar facility is outside the heritage registration for Mount Rothwell Homestead (identified in the Greater Geelong Planning Scheme as HO295).	We confirm the proposed facility is outside of the heritage registration for Mount Rothwell Homestead (HO295). Please see maps showing extent of heritage overlay with respect to the development site. We note, we have been in discussion with the property owner regarding potential impact to the heritage significance of this property.

Item	Further Information Requested	Response
5.	<p>Written advice is sought from the Wadawurrung Traditional Owners Aboriginal Corporation given that this is an Aboriginal Heritage Place identified in the Schedule to the Heritage Overlay for HO294.</p>	<p>The site and development area does not overlay with the Aboriginal Heritage Place identified in the schedule to the Heritage Overlay H0294</p> <p>The Proponent has engaged with the Wadawurrung Traditional Owners Aboriginal Corporation since 2020 and this is ongoing as a CHMP is being prepared for the site (with the complex field assessment currently underway). We also aware that Department of Transport and Planning have sought referral comments from the Wadawurrung Traditional Owner Aboriginal for this Corporation for this application.</p>
6.	<p>An environmental management plan including, a construction management plan, any rehabilitation and monitoring as required by Clause 53.13 of the Greater Geelong Planning Scheme.</p>	<p>It is our expectation that these documents will be submitted and approved by the responsible authority prior to the commencement of works or at such other time which is agreed by the Responsible Authority.</p> <p>Once approved the plans will then form part of the permit.</p>
7.	<p>An updated Acoustic report, referencing current Environment Protection Act 2017 and any other relevant EPA guidelines (1826.4: Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises and entertainment venues and 1843:</p> <p>Civil construction, building and demolition guide at a minimum) and including any mitigation measures based on current legislation.</p>	<p>Please refer to the updated NIRV assessment prepared by Norman Disney & Young Revision 2.0.</p>
8.	<p>Provide confirmation as to whether staff amenities that will result in liquid waste will be included onsite. If there are, an Onsite wastewater system will be</p>	<p>There will be no on-site effluent disposal. The site will have a compost toilet for maintenance workers which will be maintained on a regular</p>



Item	Further Information Requested	Response
	required and site plan demonstrating type and size of system is required as part of the planning assessment.	basis with any compost waste being disposed of off-site.
9.	Request the preliminary vehicle crossing layouts for the proposed access points are provided with swept paths provided for the largest design vehicle expected to enter the site to confirm the access points will be functional.	A design drawing showing the Department of Transport standard Rural crossing has been provided. It would be expected that any new access points on Little River Ripley Road would be constructed in accordance with this specification to accommodate b-double trucks. This design drawing should be reviewed in conjunction with the Traffic Impact Assessment submitted as part of Appendix N of the planning permit documentation.
10.	Confirmation that the Cultural Interpretation and Ecological Corridor is not proposed to be a public space and would remain privately managed and maintained land.	The Cultural Interpretation and Ecological Corridor will remain privately managed and maintained land.
11.	Diagrams for Planting Typology 1-5 are missing and are required.	Please refer to the planting typologies in the updated landscape strategy prepared by Urbis. Noting the updated landscape strategy now features a total of 4 typologies.
12.	Clarification is sought for a small section of typology 5 medium shrub planting, and small section of typology 4 screen planting with no trees.	The landscape strategy has been updated and typology 4 and 5 have been amalgamated to clarify the planting types. Further details have been provided for all planting typologies identified within the updated landscape strategy.
13.	An updated map series in the Biosis Report that shows higher resolution images of native vegetation on site overlaid with the proposal and all its associated infrastructure (ideally separated into individual properties).	Please refer to the updated site plan prepared by Urbis dated February 2023. Plans indicate all native vegetation proposed for removal and retention, overlaid with the proposal and associated infrastructure.

Item	Further Information Requested	Response
14.	A review of the wetland mapped patch in the southeast property, as shown in Figure 2.1 of the Biosis Report.	<p>Please refer to section 3.2.7 of the Biosis Report, which states the two patches of EVC 125 Plains Grassy Wetland in the south-east section of the study area are not considered to represent examples of ‘Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains’ as they are associated with a constructed dam, and the area would not have supported wetland plants prior to the construction of the dam.</p> <p>We note, no development is proposed in these areas.</p> <p>Management of these wetlands during construction will be addressed in a Construction Management plan and Environmental management plan to ensure the wetlands are not drained or adversely affected as a result of the development.</p>
15.	Updated map series to show high resolution maps (ideally by individual property) with mapped values, methods (GSM transects and SLL tile grid locations) and results of targeted surveys (including locations of FFG Act listed species).	<p>Please refer to the updated site plan prepared by Urbis dated February 2023.</p> <p>Please refer to additional site plans 300-SO, 301-SO and 302-SO which have been prepared as separate detailed site plans convenience.</p> <p>The results of targeted surveys (including locations of FFG Act listed species) has been appropriately mapped within the Biosis report – please refer to Figures 2.1 and 3.</p>
16.	An offset statement providing evidence that an offset that meets the offset requirements for the native vegetation to be removed has been identified and can be secured in accordance with the Guidelines. A suitable statement includes evidence that the required offset:	<p>Please refer to the proposed offset strategy at section 5.5 of the Biosis report.</p> <p>We note, the offset target for the current proposal will be achieved via a third-party offset.</p> <p>Biosis are currently undertaking a review of the Native Vegetation Credit Register to determine availability of the required credits for purchase from a native vegetation credit owner. Evidence</p>



Item	Further Information Requested	Response
	<ul style="list-style-type: none"> – is available to purchase from a third party, or – will be established as a new offset and has the agreement of the proposed offset provider, or – can be met by a first party offset. 	<p>that the required offset is available will be provided separate from this response.</p> <p>Noting, the required offset would be secured following approval of the application to remove native vegetation and in accordance with the Guidelines all offsets will be secured prior to the removal of native vegetation.</p>
17.	Nocturnal fauna/ targeted bat surveys	<p>Trees within the site provide roosting and/or nesting opportunities for a range of locally common, hollow-dependent woodland avifauna, arboreal mammals and microbats. However, no bat species or habitats suitable for roosting or nesting were recorded within the subject area. As such, targeted surveys were not considered this stage.</p> <p>It is expected that a Wildlife Management Plan including specifications for native fauna identification, monitoring, protection, salvage, and relocation measures will be implemented during removal of nature vegetation, in particular removal of large hollow bearing trees, and the construction by a licensed native fauna handler as a condition of the permit, should a permit be issued.</p>
18.	Targeted Growling Grass Frog surveys.	<p>There is a medium likelihood of the Growling Grass Frog occurring in the study area.</p> <p>Farm dams within the study area represent low quality habitat for Growling Grass Frog and are considered unsuitable to support breeding activities The local viability of Growling Grass Frog is not considered dependent on these waterbodies, singly or in combination.</p> <p>As such, the Growling Grass Frog was not considered for targeted surveys.</p>

Item	Further Information Requested	Response
		Please refer to section 6 of the Biosis report for further details relate to the impact on the Growling Grass Frog environs.
19.	Consideration of the impacts of 2.3m perimeter fencing on wildlife and Matters of National Environmental Significance under the EPBC Act.	<p>Elgin energy have begun preparing a referral to the Australian Government (Minister for Planning) to determine whether the projects should be considered under the EPBC Act for impacts to these species based on the recommendations of the provided Flora and Fauna assessment prepared by Biosis.</p> <p>It is expected that the commonwealth is to advise on any potential impacts due to perimeter fencing as necessary.</p> <p>We note, the proposed fencing is commensurate with standard solar farm development.</p>
20.	An updated Avoid and Minimise Statement in the Biosis Report that meets the application requirements of ESO4 and Clause 52.17.	Please refer to section 5 of the updated Flora and Fauna report prepared by Biosis.
21.	An updated Biosis Report that provides a description of the effect of the proposed development in relation to other areas of native vegetation or native fauna habitat, including any proposed conservation reserves, streams and waterways. This includes Mt Rothwell Sanctuary, You Yangs Regional Park, Little River and its associated waterways.	<p>Wider studies in relation to other areas of native vegetation or native fauna habitat outside of the subject site will not be considered prior to submission of EPBC and EES referrals.</p> <p>Noting the project is located within modified grazing and cropland that is primarily cleared of native patch vegetation and the condition of scattered trees and patches of native vegetation, including threatened Plains Grassland, is likely to continue to decline under the current management regime.</p>

Item	Further Information Requested	Response
22.	A Land and Environment Management Plan that meets the application requirements of ESO4.	Following discussions with the City of Greater Geelong on 8 February 2023, it was accepted that Land and Environment Management Plans are typically submitted prior to construction and would be expected to be conditioned onto any planning permit granted for the development.
23.	Consideration of vegetation losses associated with reducing fire risk and what vegetation is considered exempt or requires a permit.	There is no vegetation proposed to be removed to accord with reducing fire risk from the development. The site has been designed to comply with the CFA's Design Guidelines and Model Requirements for Renewable Energy Facilities (2022). It should be made clear that the project has been designed to minimise native vegetation removal and this includes removal for fire risk and hence siting and designing of components has accounted for this meaning no additional vegetation is required to be removed to reduce fire risk.

3.2. COUNTRY FIRE AUTHORITY (CFA)

The following provides a response to matters raised by the CFA on 13 February 2023, regarding the proposed development.

	Requested information	Response
1	Limited fire brigade access to the BESS installation. According to the plans, the nearest entrance is over 1.6km to the BESS, and requires travelling through two non-related areas of the facility, and under powerlines. We recommend review of the design to ensure efficient and safe access for fire brigade vehicles. CFA's expectation would be the provision of an access point near the BESS.	<p>The development complies with the CFA's Design Guidelines and Model Requirements for Renewable Energy Facilities (2022). This includes setbacks, buffers and water access for the BESS. The BESS also has fire suppression systems designed into it (and detailed in the application).</p> <p>The BESS has been located so that it has proximity to the substation, but is not in the direct view of any adjoining dwellings or roads. The BESS will be supplied with an additional water tank and can also be accessed from the north via Little Ripley River Road avoiding the need to access under the existing powerlines. We consider all these factors and the compliance with the CFA guideline to be an adequate design response without impacting the</p>

	Requested information	Response
		amenity of adjoining residences or cultural heritage or ecology values of the site.
2	There is no fire water supply proposed for the BESS. Based on the information provided with the application, CFA's expectation would be a 576kL water supply provided adjacent to the BESS. This is in addition to the water supplies proposed in the application.	We would be happy to comply with the requirement for a fire water supply of 576kl for the proposed BESS as a condition on the permit.

4. PROPOSED AMENDMENTS IN RESPONSE TO PRLIMINARY ISSUES OUTLINED IN THE RFI AND REFERRALS

Our responses to the preliminary issues outlined in the RFI are as follows:

Native Vegetation Removal

Following discussion with the Department on the 15 December 2022, the proposal has been amended to investigate opportunities to minimise the removal of scattered trees.

As indicated on Figure 1, the design has avoided the majority of plains grassland within the site in order to avoid significant impact to critically endangered FFG Act listed species (Golden Sun Moth), even though it is considered low quality vegetation. Note, whilst this patch of EVC heavier soil Plains Grassland is considered to be of low quality, it meets the key condition threshold for Natural Temperate Grassland of the Victorian Volcanic Plain (EPBC Act listed).

The revised design now seeks to avoid the installation of solar panels immediately south-east of the ecological corridor in order to preserve a greater number of scattered trees. These trees have been prioritised for retention, as they assist in improving connectivity and the area of remnant vegetation along Sandy Creek. In the design presented in the original Planning Permit application, 97 of the 187 scattered trees and 10 of the 38 patch trees were identified for removal. In the current design, scattered tree impacts have been reduced to 70 trees and patch reduced to 5 trees. This equates to 33% of all the trees mapped within the study area (reduced from 47% of all the trees). Please refer to Figure 3 Below.

Consideration has been given to the installation of solar panels in areas of low-quality plains grasslands located in the north west of the subject which are not considered Golden sun moth habitat, in order to preserve a greater number of scattered trees onsite. However, following further geotechnical investigation into the western portion of the site, variable surface condition were identified with shallow rock encountered in numerous locations, specifically basalt boulders as shown in figure 2.

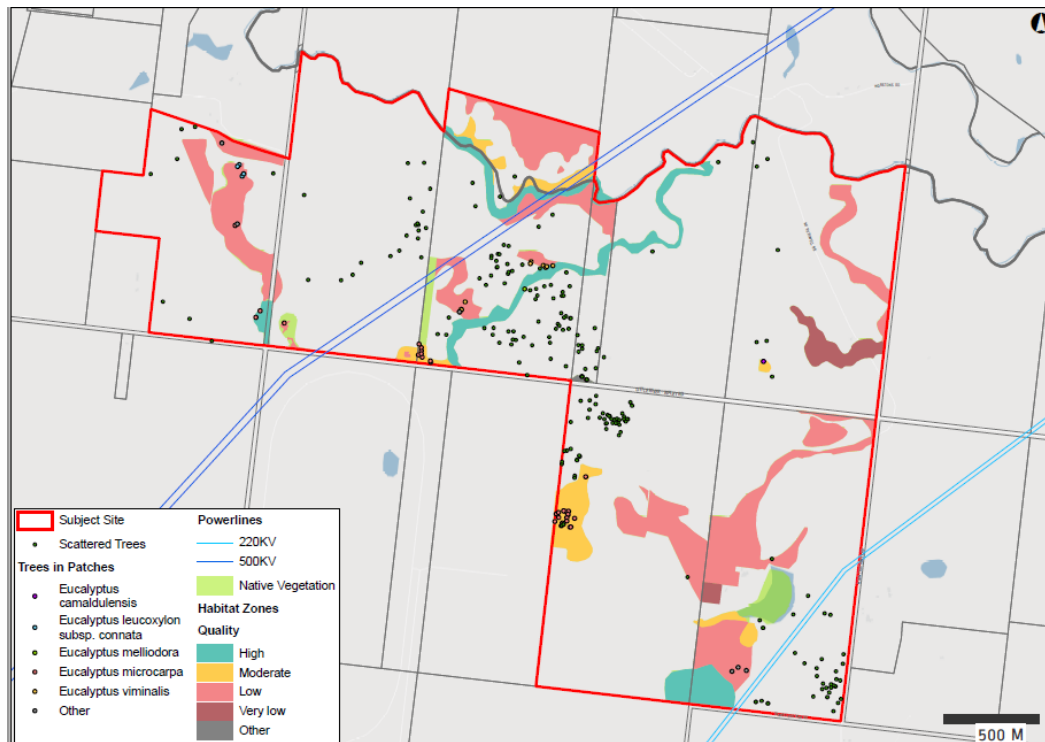
The presence of shallow rock significantly impedes on the ability to install piles/rodes that support solar panels. With a potentially irregular rock surface and floaters such as basalt and granite, many

profiles would normally be required to fully characterize rock depths. Additionally, if the areas have large uneven outcrops, these areas will need to be flattened and evened, which would result in significant time and cost implications. Overall, the presence of rock in the western portion of the site makes the installation of solar panels infeasible.

We note the proposed location of the BESS does not require the removal of any native vegetation and perimeter fencing and access tracks have been adjusted avoid individual trees where possible. The proposed substation compound which take up a very small percentage of the total site area has been appropriately located immediately west of the transmission lines that run through the south of the site. This is to allow direct connection via cables on power poles at the primary point of connection.

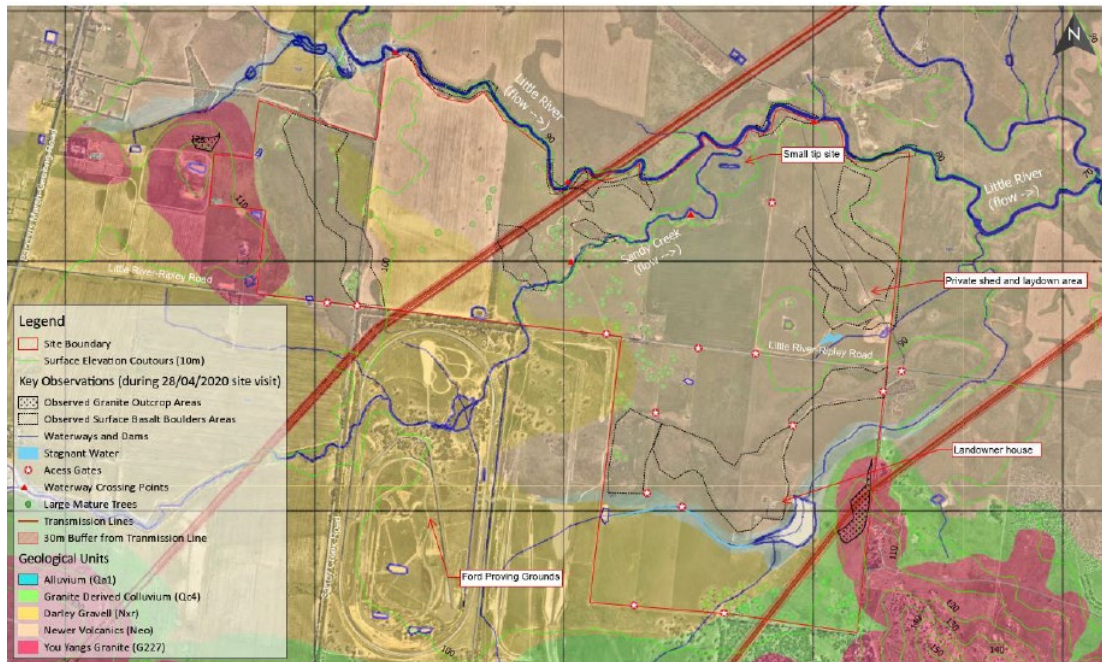
There is currently no alternative location which would reduce the impact on native vegetation without resulting in significant amenity impact to neighbouring properties to the east. Noting the plains grassland proposed for removal is of poor quality and not considered important native vegetation (please refer to Figure 1&2 below).

Figure 1 Vegetation Quality Assessment



Source: Urbis 2023

Figure 3 Site plan presenting indicative geological units contained within the proposed site boundaries



(Source: SMEC Little River Desktop Study, Document Ref. 30042852G Rev1, Dated 26/05/20).

5. CONCLUSION

We trust this response and the enclosed information suitably addresses the matters raised in the further information request. Should this information in whole or part not constitute, in the Department's view, a satisfactory response, please accept this letter as a request to extend the time to provide information under Section 54A of the Planning and Environment Act 1987.

Yours sincerely,

Callum Goldby
 Consultant
 +61 3 8663 4964
 cgoldby@urbis.com.au