



BUNYIP NORTH BESS AGRICULTURAL ASSESSMENT REPORT

Lot 2 PS315155 Bunyip North

June 2026

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Table 1. Project Status

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Executive Summary

This Agricultural Assessment Report examines the impact of the Bunyip North BESS (The Project), which proposes the installation of a 400MW battery energy storage system (BESS) at Lot 2 PS315155 Bunyip North, approximately 80 km south-east of Melbourne. The assessment is a desktop study of the characteristics of the locale and study site and considers the impacts the BESS will have on the farming enterprise and nearby land uses.

The siting of the proposed BESS has been influenced by its proximity to existing 220kV transmission infrastructure (four separate 220kV transmission lines cross the property) and the Princes Freeway for construction logistics purposes.

The site of the proposed BESS is currently used to graze dairy cattle, and the land has been used for this purpose since 1987. The soils are moderately productive and well suited for dairy production and benefit from flat topography and high annual rainfall.

The farming enterprise includes land under management that is both contiguous and non-contiguous to the Project site. The contiguous land totals approximately 132 hectares across the north and south of Cannibal Creek, of which approximately 120 hectares is grazable. Of this, the proposed location of the BESS is on Lot 2 PS315155, south of Cannibal Creek and north of the Princes Freeway which has an area of 36.65 hectares. Proposed access to the allotment is via a new direct access way from the Princes Freeway. The indicative development footprint of the Project within this allotment is approximately 17.5 hectares.

The proposed BESS will have negligible impacts on stocking rates, gross margin income or the long-term viability of the enterprise. The proposed position of the BESS and access will not fragment the agricultural land and will not restrict access to water or rural infrastructure. The BESS installation is largely reversible and will have no permanent impact on the productive capacity of the soils beyond the life of the project. Further, the lease income is intended to be reinvested in the host enterprise, to fund pasture renovation, and other improvements that may result in an increase in carrying capacity. As such, the Project can be considered to support and enhance the continued, sustainable agricultural production on the balance of the landholding.

The impacts of the construction of the BESS on surrounding land uses have been assessed, and the risk of land use conflict has been determined to be acceptable with the introduction of appropriate and proportional risk control measures.

Modelled data indicates that groundwater beneath the development site is shallow, ranging from approximately 1.174m to 2.189m below ground level (BGL). Groundwater in the area has beneficial uses including for agricultural purposes (irrigation and stock and domestic supply), which need to be protected. However, no groundwater impact assessment has been undertaken to support the planning permit application. Given the shallow groundwater conditions, it is considered that further investigation is warranted at the detailed design stage to verify actual groundwater levels and assess whether the proposed development will impact beneficial uses.

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1 Introduction

Environmental Resources Management (ERM) have engaged Pinion Advisory to develop a desktop agricultural assessment for a 400MW/2400MWh (400MW for 6 hours) Battery Energy Storage System (BESS) installation. The BESS is proposed to be located on Allotment 2 PS315155 which is situated north of the Princes Freeway, approximately 2.5km from the town of Bunyip in the Cardinia Shire. No site assessment has been conducted on the property with the following report based on reputable publications in the public domain, information supplied by the proponent and the landholder, and specialist assessment by Pinion Advisory.

This agricultural assessment report will accompany a planning permit application submitted to the Department of Transport and Planning under the Development Facilitation Program (DFP) pathway.

The assessment considers the extent to which the proposal will affect agricultural productivity, land capability, farm viability, and future agricultural use of the land, having regard to accepted principles for agricultural land use planning in Victoria. The report is separated into two sections:

- (a) impacts within the boundary of the farming enterprise; and
- (b) impacts that could affect neighbouring landholders.

The total area of the farm upon which the BESS project is proposed to be developed totals approximately 132 hectares of which it is estimated that 120 hectares are grazable when riparian areas along Cannibal Creek and internal roads and improvements are excluded. The BESS development area is 17.5 hectares or approximately 15% of the grazable land.

The site was selected for the proposed BESS installation because of its position along the existing 220kV transmission network which traverses the southern section of the site, and its location between the Latrobe Valley and Melbourne's major electricity demand areas (RES, 2026). Further, the sites proximity to the Princes Freeway supports ease of access to the major road network.

2 Description of the Proposal

The proposal involves the construction and operation of a 400 MW BESS within a defined area of approximately 17.5 hectares.

Key components of the development include:

- A series of battery units, inverters, cooling systems, medium voltage (MV) transformers, protection devices, ring mains units and connecting infrastructure
- Control room, switch room and maintenance buildings
- Utility connections
- Aboveground infrastructure and underground alternating current cables
- Sealed main road site access at the entrance from the Princes Freeway
- Unsealed formed internal tracks
- Fire protection equipment including water tanks, booster pumps and hydrants
- Installation of perimeter fencing
- Temporary construction laydown and vehicle turning areas for use during the construction phase which is expected to last up to 27 months
- Ancillary infrastructure (e.g. control buildings, drainage, fire management measures)

2.1 NATURE OF THE LAND USE CHANGE

The development of a BESS would introduce a utility installation within the Green Wedge Zone, which is a permitted activity with consent under the Cardinia Planning Scheme.

Land uses abutting the development include
North - Cannibal Creek (PCRZ)
South - Transport Zone 2 - Princes Freeway
East - Green Wedge Zone - farming land
West - Green Wedge Zone - farming land

2.2 NATURE OF PRECINCT WHERE LAND USE CHANGE IS PROPOSED

The project site is located adjacent to the Princes Freeway within a rural property accessible via 30 Tonimbuk Road Bunyip North. The surrounding development comprises rural properties which accommodate primary production and agricultural uses including livestock farming, dairy production and cropping. The BESS will be constructed within Allotment 2 PS315155.

2.3 SITE HISTORY

The site has a long history of farming and grazing. The property has been used as a dairy farm under its current ownership since 1987. Prior to this, the land was used for grazing beef cattle. A review of aerial images from 19/2/1979 and 16/3/1987, confirms this land use history.

3 Site Location

The allotment hosting the project site is located within a dairy farming enterprise bounded on the southern side by the Princes Freeway and by Cannibal Creek on the northern boundary. The eastern and western boundaries abut farming land. The adjoining farming land immediately north of Cannibal Creek is under the same management as the subject site.

The landholding contains multiple improved pasture paddocks that are strip grazed and rotated for hay and silage production to supplement rain-grown pasture. A homestead, shedding and yards are located on adjacent land under the same ownership (Lot 1 PS315155).

Extensive native vegetation exists in the northern section of the land abutting Cannibal Creek; none of which will be impacted by the proposal with the proponent adopting a minimum 200m infrastructure setback from the Creek.

The proposed BESS will cover approximately 17.5 hectares, or 15% of the available grazing land under the same ownership (see Figure 1).

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3.1 SITE DETAILS

Table 2 Site Identification and Location Details of the BESS

Site Identifier	Details
Address	30 Tonimbuk Road, Bunyip North, VIC 3815 (proposed new access point direct from Princes Freeway)
Crown Description	2\PS315155
LGA	Cardinia
Council Property Number	4857750100 (part)
VicRoads Reference	96 D3
Zoning	Green Wedge Zone (GWZ1)
Overlays	• Environmental Significance Overlay – Schedule 1 • Land Subject to Inundation Overlay (LSIO)* • Area of Aboriginal Cultural Heritage Sensitivity*

*The LSIO and Aboriginal Cultural Heritage Sensitivity mapping impacts the northern extent of the allotment, in proximity to Cannibal Creek, however the overlays do not impact upon the BESS project area which has been actively sited to avoid overlap.

The land is zoned Green Wedge Zone (GWZ1). The purpose of GWZ1 is:

To implement the Municipal Planning Strategy and the Planning Policy Framework.

To provide for the use of land for agriculture.

To protect, conserve and enhance the biodiversity, natural resources, scenic landscapes and heritage values of the area.

To ensure that use and development promotes sustainable land management practices and infrastructure provision.

To protect, conserve and enhance the cultural heritage significance and the character of rural and scenic non-urban landscapes.

To recognise and protect the amenity of existing rural living areas.

The land use for a BESS is described in Clause 73.03 as a Utility Installation, being land used to *transmit distribute or store power*.

A Utility Installation is a Section 2 use according to Clause 35-05-1 of the Cardinia Planning Scheme and is permitted in the GWZ1 with consent.

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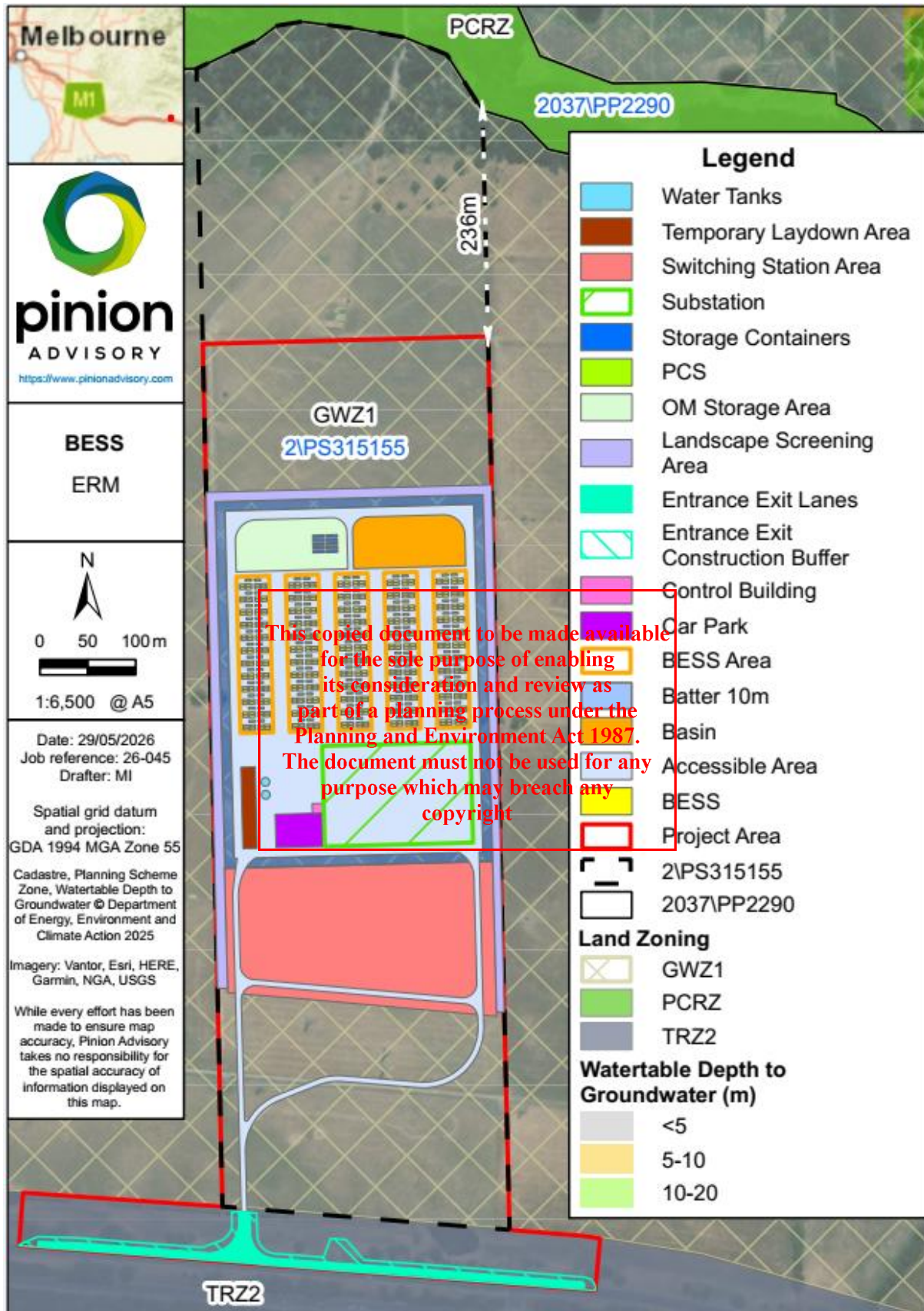


Figure 1 Location of the BESS Within Lot 2
(source: ERM)

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4 Site Characteristics

The location of the BESS installation is flat with slopes of less than 1%. Outside the BESS development footprint, the property is gently undulating with slopes of up to 3% which are typical of the locale.

The allotment hosting the BESS includes approximately four hectares of riparian vegetation abutting Cannibal Creek on the northern boundary. None of this vegetation will be impacted by the proposed development with a minimum 200m setback adopted by the proponent to avoid impact to this vegetation and the Creek itself.

Wider improvements on the property outside of the allotment include a dwelling, dairy, shedding, grain silos, cattle yards internal fencing and roads, earthen dams, and above ground water tanks, troughs, stock-feeders.

5 Geology and Soils

The soils are derived from granite derived colluvium identified as Qc4 in the GeoVic map below (Figure 2). The soils in the Bunyip area are derived from underlying granitic parent rock and are common in foothill landscapes around Bunyip North (Welsch et al, 2011).

The topsoils are coarse textured and loam to heavy sand with clay content increasing with depth. They are weakly structured which permits vigorous root exploration and penetration, however they have constraints for intensive agriculture including low to moderate water holding capacity and low cation exchange capacity which is indicative of low fertility. Granite derived colluvium soils are commonly acidic (pH5.0-6.0) which can lead to limited uptake of important nutrients (calcium, magnesium, phosphorus and molybdenum) by plants.

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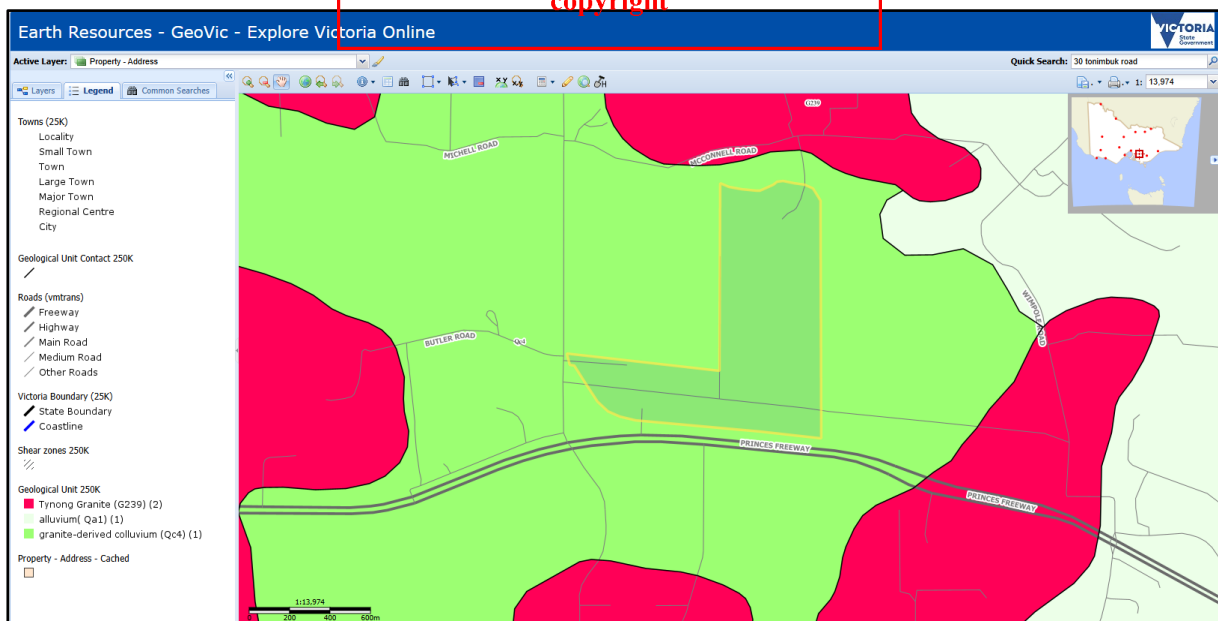


Figure 2 GeoVic Map (GeoVic accessed 12/05/2026)

A review of the GeoVic and the Earth Resources portals show that the land is not subject to any mineral or rock extraction or exploration licences.

Agricultural land capability in Victoria ranks land from highly productive land (Class 1) to land with very limited agricultural potential (Class 5) based on constraints such as soil type, slope, erosion, and water holding capacity. An assessment of the agricultural quality of land in Gippsland by Volum and Swan in 1984, sponsored by the Victorian Department of Agriculture, identified that the land in the Bunyip area is Class 3 Land – see Figure 3. Class 3 Land is defined in the Volum and Swan report as follows:

'Class 3 land generally is of limited versatility but is very good dairying and grazing land. It is sometimes suitable for orchards and extensive area cropping but not suitable for intensive uses such as vegetable growing.'

The Cardinia Planning Scheme includes a land capability map at Clause 14.01-1L. The map separates the agricultural land within the Shire into four categories - High>Good>Fair>Poor, which are not further defined. The land in the Bunyip area is in the 'Fair' category which generally corresponds to the definition of Class 3 Land in the Swan and Volum (1984) report and fits the constraints inherent to the soil type of the area.

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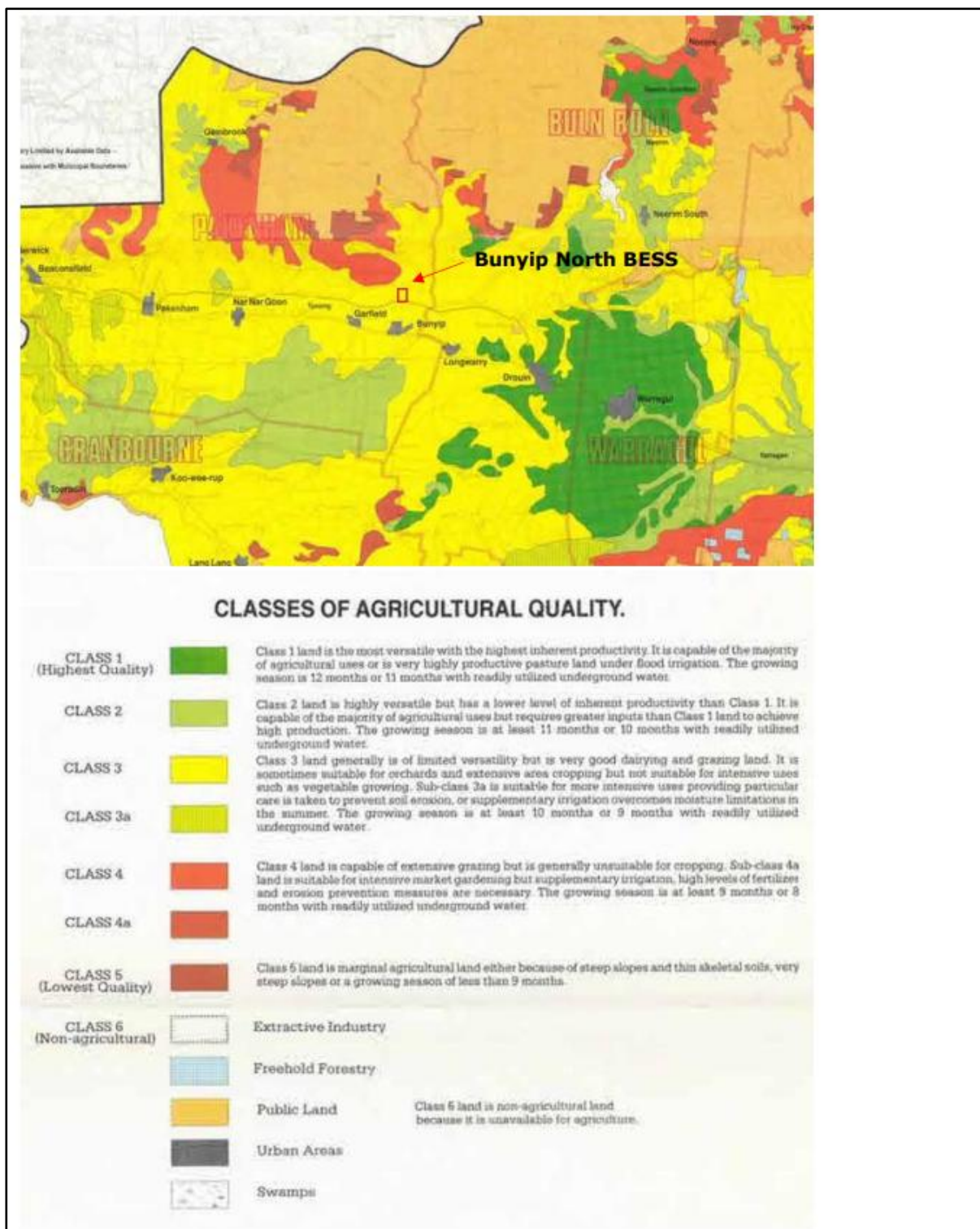


Figure 3 Soil Classification Map
(source: Swan and Volum, 1984)

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6 Climate and Rainfall

The project site is in an area of moderate to high rainfall, evenly spread throughout the year. The nearest Bureau of Meteorology station to Bunyip North is at Noojee 52km northeast of Bunyip North, followed by Powelltown, 53km north. Mean annual rainfall for Noojee (1981 to 2025) is 1112mm and 1442mm for Powelltown (1942 to 2025).

The regional weather and climate guide for West Gippsland, published by the Bureau of Meteorology and CSIRO have identified that the long-term average rainfall of the West Gippsland region is 850mm (BOM, 2019).

7 Hydrogeology

The site is within the Koo Wee Rup Water Supply Protection Area. Groundwater is shallow at less than 5m. The shallow aquifer (0-15m BGL) contains groundwater with salinity ranging from 1,001-3,500 mg/L, with beneficial uses to be protected that include, potable mineral water, irrigation, stock water, industry, ecosystem protection, and buildings and structures.

The deeper aquifer (15-215m BGL) contains groundwater with salinity ranging from 3,501-13,000 mg/L, with limited beneficial uses to be protected that include stock water, industry, ecosystem protection, and buildings and structures.

There are three licenced stock and domestic bores within a 5km radius of the site.

WRK 108774 1.0 km south

WRK 117126 3.75 km east

WRK 130550 5.0 km south-east

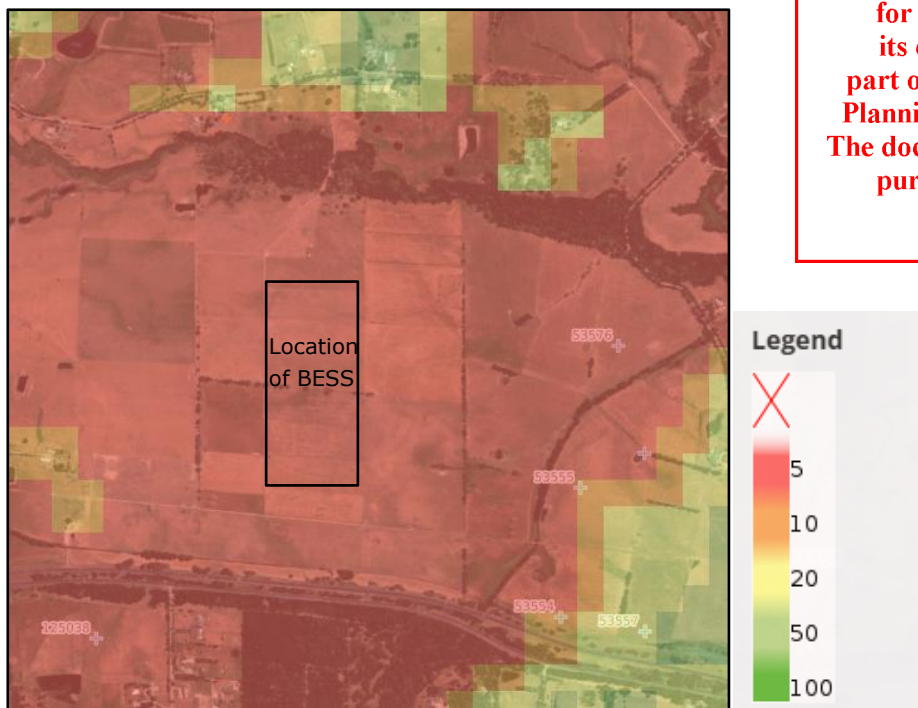


Figure 5 shows the modelled depth to groundwater within the proposed BESS location with five randomly selected locations indicating a depth to groundwater ranging from 1.174m BGL to 2.189m BGL.

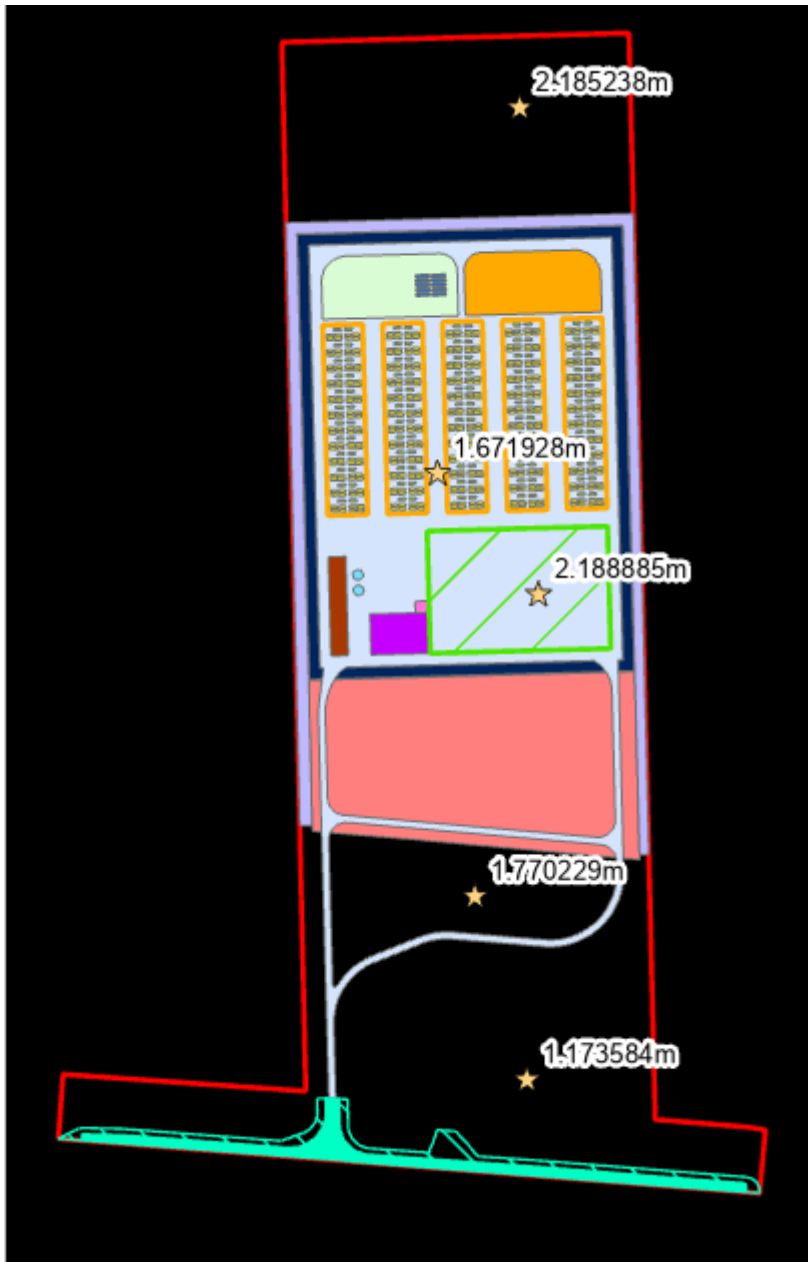


Figure 5 Depth to Groundwater Within Development Footprint
(source: Visualising Victorias Groundwater)

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8 On Farm Impacts

8.1 ACCESS TO RURAL INFRASTRUCTURE

The footprint of the BESS will not fragment the landholding or restrict access to water or rural infrastructure. Water is distributed by a reticulated watering system that fills tanks and troughs at multiple locations across the farm for access by stock. Tanks, pipelines and troughs can be easily relocated if required. Passage to critical infrastructure, including the dairy, holding yards, loading ramps, feed and water troughs will not be restricted by the proposed BESS development.

8.2 CARRYING CAPACITY

The Agriculture Victoria Dairy Monitoring Project identifies that the average stocking rate for dairy farms in Gippsland is 1.9 lactating cows per hectare - this figure has been used to assess on-farm impacts.

The landowner has indicated that the herd is a mix of beef and dairy cattle, with the numbers of beef cattle fluctuating depending on seasonal conditions. It is understood that currently the herd consists of 160 lactating dairy cows and approximately 60 beef cattle. Based on a stocking rate of 1.9 cows per hectare, the removal of 17.5 hectares will theoretically reduce the dairy herd by 33 cows. However, in practice this number can be offset by extending the dairy grazing area into contiguous areas of the farm that are currently opportunistically grazed by beef cattle; doing so will ensure that the dairy specific infrastructure remains fully utilised. The impact to beef cattle numbers can likewise be offset by removing them to non-contiguous land in the same area that is owned or leased by the farmer.

8.3 ECONOMIC IMPACTS

Gross margins per hectare for dairy producers in the region are variable and are dependent on seasonal and market conditions. The Dairy Farm Monitoring Project for 2024-2025 identified that the average production in Gippsland was 503 kg milk solids (MS) per cow, or 955kg MS per hectare at a stocking rate of 1.9 cows per hectare. The gross income for Gippsland dairy farms in the 2024-2025 financial year was \$9.05 per kg of milk solids, equating to a gross income of \$8,649 per hectare. For the same period variable costs were \$4.93/kg MS and overhead costs were \$3.03/kg MS, equating to total production costs of \$7,607 per hectare, resulting in a gross margin of \$1,042 per hectare. Therefore, removing 17.5 hectares from production will result in a loss of gross margin income of \$18,235 per annum.

The 2024-2025 season may be considered atypical and was influenced by a 9% decrease in farm-grown feed, a 10% decrease in average milk price and an 11% increase in interest and lease costs. To illustrate the impact that seasonal and market variability have on profitability, the gross margins for the previous five seasons are shown in Table 3 below (adjusted to 2024-2025-dollar equivalents).

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Table 3 Gross Income for Gippsland Dairy Farms 2020-2025

Season	Milk Solids (MS) (kg/cow)	Gross Income (\$/kg MS)	Total Variable Costs (\$/kg MS)	Total Overhead Costs (\$/kg MS)	Gross Margin (\$/kg MS)	Gross Margin (\$/ha)
2024-2025	503	9.05	4.93	3.03	1.09	1,042
2023-2024	506	10.29	4.68	3.01	2.60	2,500
2022-2023	506	11.21	5.25	3.03	2.93	2,816
2021-2022	471	9.03	4.50	2.92	1.61	1,441
2020-2021	485	8.53	3.80	2.63	2.1	1,935
Average	494	9.62	4.63	2.92	2.07	\$1,947

(Source: Dairy Farm Monitor Project 2024-2025)

Using the five-year average gross margin for illustrative purposes - the removal of 17.5 hectares from production equates to the **loss of gross margin income of \$34,069 per annum** without any offset or mitigation measures. As previously mentioned, the farmer can utilise other contiguous land to offset this loss. Additionally, the income from the lease of the land is expected to exceed the loss of agricultural derived income.

Land values in West Gippsland have been increasing 8-10% year on year and the stable reliable supplementary passive income generated by the BESS lease will offset the lost agricultural derived income and underwrite the viability of the farming enterprise for the development and operational life of the BESS, estimated to be 20 years.

8.4 LAND CAPABILITY AND REVERSIBILITY

While productive, the land is not considered strategic or high value irrigated agricultural land at a regional or state level.

It is estimated that topsoil will be stripped to a depth of between 200mm to 400mm during construction of the BESS, while excavations for concrete footings for key components such as battery containers and underground cables will require deeper excavation.

The modular design of the BESS allows for a straightforward decommissioning and removal process at its end-of-life, enabling for land remediation, reinstatement of topsoil and its return to agricultural production. The reversibility of the development significantly reduces the permanent impact on agricultural land capability. RES has advised that the proposed future terminal station will remain after the decommissioning of the BESS as an extension to the Victorian Declared Shared Network. The terminal station has a footprint of approximately four hectares.

8.5 VIABILITY

The proposed development will remove approximately 17.5 hectares of productive grazing land from production which equates to 15% of the total contiguous landholding. This theoretically equates to a loss of 33 cows from the herd. However, in practice this loss can be effectively mitigated by the landholder and it is recognised that the balance of the allotment will be retained for agricultural use. Regardless, the loss of 33 head is

insignificant compared to the state of Victoria's herd numbers of 4.3 million head (ABARES, 2025). It is considered that the existing farming operation can proceed largely unchanged.

The proposal is unlikely to reduce the gross farm income of the enterprise for the following reasons:

- A repurposing of contiguous land currently used for opportunistic beef cattle backgrounding. These cattle will be moved to non-contiguous land under the same management to support maintenance of the current herd size.
- Supplementary income from the BESS lease will effectively offset the loss of annual income from farming activities. Furthermore, this passive income will not be subject to the seasonable variability and market forces that impact the overall farming enterprise. As such this income is considered as stable, low risk income to be used to reinforce the viability of the farming enterprise.

8.6 SUPPORT AND ENHANCEMENT OF AGRICULTURAL PRODUCTION

Beyond maintaining the existing farming enterprise, the project can be considered to support and enhance it as the landowner has indicated that the stable, passive lease income from the BESS will support reinvestment in the land under management, including:

- Pasture renovation to reduce weeds and increase feed production resulting in a potential increase in carrying capacity across the broader farming enterprise;
- Maintenance and upgrades to existing on-farm infrastructure including fencing and laneways; and
- Improved resilience of the dairy operation to seasonal and market volatility through diversification of farm income.

Reinvestment of lease income on pasture renovation and infrastructure improvements may lift the productive capacity on the balance of the contiguous and non-contiguous landholdings beyond pre-project levels, such that the net effect of the project on agricultural production at the property scale may be positive rather than neutral. At the regional scale, retention of the dairy enterprise at existing herd numbers, combined with reinvestment-driven uplift in carrying capacity, supports the continued contribution of this property to West Gippsland's dairy sector.

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9 Off Farm Impacts

This assessment has been undertaken to determine the potential land use conflicts between the proposed development of a BESS and existing land uses in the locale. This section aims to objectively assess the effect of a proposed land use on neighbouring land uses which are primarily associated with agriculture, rural lifestyle and transport. Conflicts may occur when one land user is perceived to infringe on the rights, values, or amenity of others. Rural amenity issues are the most common land use conflict, followed by environmental protection issues (DPI, 2011).

The planning permit application for the BESS developed by ERM details the stakeholder engagement that has occurred with government agencies, traditional owners, adjoining landholders and the larger community. Consultation is summarised in Table 5-1 and Appendix J of the Planning Permit Application. The table below has been adopted from Appendix J of the Consultation Summary Report and summarises the concerns that have been raised about the project.

Table 4 Summary of Concerns

Theme	Number of concerns raised
Fire safety	4
Ecology and environment	2
Land use	2
Visual amenity	1
Noise	2
Property values	1
Traffic /construction	1

9.1 RISK ASSESSMENT AND CONTROL

The risk ratings (severity of the consequences) have been established by assessing the consequences of the risks and the likelihood of the risks occurring. The following risk matrix has been adapted from the Land Use Conflict Risk Assessment Guide (DPI, 2011).

Table 5 Risk Matrix

	Probability				
	A Almost certain	B Likely	C Possible	D Unlikely	E Rare
Consequence					
1 Severe	25	24	22	19	15
2 Major	23	21	18	14	10
3 Moderate	20	17	13	9	6
4 Minor	16	12	8	5	3
5 Negligible	11	7	4	2	1

A risk ranking of 11-25 is deemed an unacceptable risk; A risk ranking of 1-10 is deemed an acceptable risk

A land use conflict risk register for the proposed BESS development has been prepared and is appended to this report (see Appendix 1).

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Table 6 Matrix Descriptors

Descriptor	Explanation
Severe	- Severe and/or permanent damage to the environment - Irreversible - Severe impact on the community - Neighbours are in prolonged dispute and legal action involved
Major	- Serious and/or major long-term impact to the environment - Long-term management implications - Serious impact to the community - Neighbours are in serious dispute
Moderate	- Moderate and/or medium-term impact to the environment and community - Some ongoing management implications - Neighbour disputes occur
Minor	- Minor and/or short-term impact to the environment and community - Can be effectively managed as part of normal operations - Infrequent disputes between neighbours
Negligible	- Very minor impact to the environment and community - Can be effectively managed as part of normal operations - Neighbour disputes unlikely
Almost Certain	Common or repeating occurrence
Likely	Known to occur or has occurred
Possible	Could occur
Unlikely	Not likely to occur
Rare	Practically impossible

9.1.1 Fire Safety

Battery storage fires are rare in Australia with only two confirmed incidents at large installations since 2021. Both fires occurred during commissioning or early operation, not during steady-state service. The fires were confined to either one or two battery modules (Fisher Engineering, 2022) (Genex, 2023).

The proposed development includes equipment that could increase the risk of fires starting within the development site or increase the impacts of bushfires encroaching on the development site. The risk posed by fire resulting from the proposed BESS has been assessed in the Risk Management Plan (including Fire Safety Study) prepared by Fire Risk Consultants that determined the indicative design and layout can meet the requirements of the CFA Guidelines and adequately manage the fire risk to an acceptable level.

The following controls have been identified to mitigate the risk to an acceptable level:

- Internal automated fault monitoring processes
- Cooling systems and fire suppression systems within individual battery units
- Internal barriers within individual battery units to prevent fire spreading to adjoining units
- Separation distances between individual battery units and rows of batteries in accordance with CFA guidelines
- Asset Protection Zone (an area where vegetation is managed or removed) surrounding the BESS
- Access road surrounding the BESS footprint to permit access by emergency vehicles
- Dedicated water supply for firefighting operations.

Fire Risk Consultants developed a Risk Management Plan that includes a Fire Safety Study. This study is a CFA requirement for large-scale installations exceeding 1MWh where design,

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capacity, complexity, location, or operational factors necessitate enhanced fire and explosion safety analysis (CFA, 2025).

The inherent risk score of the BESS for fire impacts without any controls has been assessed as 15, which represents an unacceptable risk. The implementation of the above controls will reduce the residual risk score to 10 which is acceptable.

9.1.2 Biodiversity

The Ecological Assessment Report concludes that the BESS project can proceed with minimal environmental risk with the following mitigation measures:

- Avoid all known habitats with potential to support Growling Grass Frog, with a minimum 200m buffer
- Identification and protection of retained native vegetation and fauna habitat through the development of a Construction Environmental Management Plan (CEMP) to the satisfaction of the responsible authority.
- Undertake targeted species surveys and reassessment of impacts, if the development footprint is extended into the 200m buffer

The inherent risk score of the BESS without any controls has been assessed as 13, which represents an unacceptable risk. The implementation of the above controls will reduce the residual risk score to 6 which is acceptable.

9.1.3 Surface Water

The key findings of the Flood Modelling Assessment indicate that the BESS footprint is largely flood free, with localised areas subject to shallow sheet flow during 1:100-year flood events, indicating a low flood hazard to the environment.

The inherent risk score of changes to flood regimes arising from the development of the BESS without any controls has been assessed as 3 which represents an acceptable risk. The completion of a post development flood impact assessment is recommended, which is not expected to change the residual risk score to 3 (acceptable).

9.1.4 Groundwater

No groundwater assessment has been completed in support of the planning permit application; however, existing modelled data indicate that groundwater at the site is shallow and of suitable quality for multiple beneficial uses that must be protected, including for agricultural purposes. Given the topography of the BESS site is almost flat, it is expected that earthworks will be relatively shallow, while concrete footings for the battery containers and trenches for the underground cables will require deeper excavation. It is recommended that the depth to groundwater be verified during the detailed design phase to identify if there are any feasible contamination source – receptor pathways that may impact groundwater e.g. lubricant and fuel spills during construction.

The inherent risk score of the BESS without any controls has been assessed as 9, which represents an acceptable risk. Ensuring adequate separation to groundwater will reduce the residual risk score to 6 which is also acceptable.

9.1.5 Biosecurity

No biosecurity assessment has been undertaken for the development. A biosecurity plan should be developed and incorporated into the Construction and Environmental Management Plan (CEMP) to manage biosecurity risks prior to construction. Generic and

easily achievable biosecurity control measures include ensuring that contractor vehicles attending the site are clean and free of mud and organic debris and are restricted to internal roads associated with the BESS, staying away from farm tracks. Biosecurity signage should be placed on the access gate, and weeds should be monitored and controlled before setting seed.

The inherent risk score of the BESS impacting farm biosecurity without any controls has been assessed as 13, which represents an unacceptable risk. The implementation of the above controls will reduce the residual risk score to 9 which is acceptable.

9.1.6 Dust

No air quality assessment has been undertaken in support of the planning permit application. Although dust generation will be restricted to the construction phase of the development, the proximity to the Princes Freeway will require mitigation with simple and well established control measures including: enforcing speed limits on unsealed tracks, watering of unsealed tracks to prevent dust emissions, ceasing dust emitting activities on windy days when dust plumes encroach on the Freeway, and the use of cover crops or soil binders to reduce the extent of exposed areas that may generate dust.

The inherent risk score of the BESS generating nuisance dust without any controls has been assessed as 18, which represents an unacceptable risk. The implementation of the above simple controls will reduce the residual risk score to 10 which is acceptable.

9.1.7 Noise

The planning permit application is supported by a noise impact assessment which modelled the cumulative noise emissions from the proposed BESS and the proposed adjacent Wimpole Battery. The noise impact assessment, based on the projected emissions from the Wimpole BESS in the absence of any noise abatement for that project, concluded that modelled emissions comply with the Noise Protocol noise limits and that no mitigation is required.

The inherent risk score of the BESS generating offensive noise without any controls has been assessed as 3, which represents an acceptable risk. As no controls are considered warranted, the residual risk assessment score remains at 3 (acceptable).

9.1.8 Traffic Impacts

The planning permit application is supported by a traffic impact assessment that identifies that the construction phase will result in an additional 118 vehicle movements per day, including 42 heavy vehicle movements. This is a significant number of additional movements that would in most rural settings represent an unacceptable land use risk. However, as the site is accessed via the Princes Freeway which carries approximately 30,000 vehicles per day (two-way traffic) the additional traffic can easily be accommodated.

The traffic impact assessment has identified the BESS development requires an auxiliary left turn lane to be constructed prior to the BESS construction phase commencing. Without the left turn lane, the inherent risk score of the traffic impacts associated with the BESS is calculated as 14 which is unacceptable. However, the installation of the auxiliary left turn reduces the residual risk score to 10, which is acceptable.

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9.1.9 Visual Amenity

The planning permit application is supported by a landscape and visual impact assessment. The main visual receptors are road users, local landholders and bushwalkers from elevated vantage points. All the vantage points that were assessed, returned a low to negligible impact score due to intervening topography and roadside or riparian vegetation, or the brief duration the BESS could be observed by road users travelling at 80km per hour.

The inherent risk score of the visual impact of the BESS without any controls has been assessed as 5, which represents an acceptable risk. As no controls are considered warranted, the residual risk assessment score remains at 5 (acceptable).

9.1.10 Dangerous Goods

Lithium-ion batteries are Class 9 Miscellaneous Dangerous Goods (DG) under the Australian Dangerous Goods (ADG) Code. As such, they require transportation on vehicles that are appropriately licenced and equipped. Additionally, BESS installations must meet Fire Rescue Victoria (FRV) requirements and be inspected and licenced by Energy Safe Victoria (ESV). The BESS will require notification to FRV and WorkSafe Victoria and the site will require a manifest of the DGs to be kept on site and readily available to emergency response personnel.

The inherent risk score of the BESS without any controls to mitigate the risks of the Dangerous Goods has been assessed as 14, which represents an unacceptable risk. The controls detailed in Section 9.1.1 Fire, are applicable to the storage of lithium-ion batteries and when implemented will reduce the residual score to 10, which is acceptable.

9.1.11 Waste Management

Waste will be generated during the construction and operational phase of the project and will be managed in accordance with the CEMP that is yet to be developed to the satisfaction of the responsible authority. The Planning Permit Application states that wastes including soil and hazardous substances will be managed in accordance with industry best practice and duties under the GED. It is noted that any soil removed from the site will require classification as per EPA Publication 1828.3 Waste Disposal Categories: Characteristics and Thresholds, prior to disposal at a lawful place.

Windblown lightweight packaging waste may pose a risk to road users due to the proximity of the Princes Freeway. Packaging waste is to be stored in accordance with applicable laws and project approvals, being generally in suitably sized wind protected and vermin proof containers and removed from the site regularly by licenced contractors.

Due to the proximity of the BESS to the Princes Freeway, the inherent risk score associated with waste generation has been assessed as 14 which is unacceptable. The application of appropriate controls lowers the residual score to 10 which is acceptable.

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10 Conclusion

This agriculture assessment report has evaluated the on-farm and off-farm impacts of the proposed Bunyip North BESS, located adjacent to the Princes Freeway and accessible via the property access at 30 Tonimbuk Road, Bunyip North, approximately 80 km south-east of Melbourne in West Gippsland. The BESS development footprint is 17.5 hectares, and the land is currently used for grazing dairy and beef cattle.

The site has moderately productive soils but is of no strategic regional or State agricultural importance. The loss of 17.5 hectares of grazing land will theoretically reduce the herd size by 33 cows resulting in an annual income loss of \$34,000. However, in practice, this loss can be offset through operational adjustments to stocking density on remaining pasture. Additionally, the low-risk supplementary income generated from the BESS lease is projected to offset the theoretical loss of income from removing 17.5 hectares from dairy production that is subject to seasonal and market fluctuations. The income from the BESS lease will represent a passive stable income to the landowner for that portion of the land.

Beyond maintaining the existing farming enterprise, the project can be considered to support and enhance it through the reinvestment of the BESS lease income for pasture renovation which may lead to an increase in carrying capacity. The BESS income is also available for use to upgrade or replace aging farm infrastructure such as fencing and laneways.

The construction of the BESS will not fragment the agricultural land or impede access to water or rural infrastructure. The proposed access directly from the Princes Freeway will help to avoid interaction or impact on the balance of the land outside of the subject allotment.

The construction of the BESS will have no long-term detrimental impacts on the productivity of the soil and is largely reversible at the end of its service life, supporting a return to pre-construction agricultural use of the land.

Wider scale impacts have been considered in the context of potential land use conflicts of the BESS installation with existing land uses and have been assessed to be acceptable, with the implementation of appropriate controls.

This desktop assessment has identified that groundwater in the area is shallow and of suitable quality for multiple beneficial uses including irrigation and stock and domestic water supply. The inherent and residual risk to groundwater has been assessed as acceptable, however it is recommended that the depth to groundwater be confirmed and any feasible contaminant source– receptor pathway be identified and mitigated by an appropriately qualified specialist, prior to finalisation of the detailed design stage.

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RISK REGISTER																			
Construction or Operational Hazard	Risk No.	Risk Event	Phase		Sensitive Receptors				Inherent Risk Assessment			Management Strategy Control Measures	Performance Targets	Residual Risk Assessment			Supporting/Reference Documentation	Land Use Conflict Y/N	Performance Monitoring
			Set up/ Construction	Operations / Production		Location and proximity to site	How hazard may harm or damage sensitive receptor	Evidence to support assessment	Likelihood	Consequence	Risk Rating			Likelihood	Consequence	Risk Rating			
<i>DUST</i>	1	Dust generated from construction activity Dust generated from additional traffic movements on site	Yes	No	1. Residential properties 2. Environment (Cannibal and Tea Tree Creek and roadside native vegetation) 3. Road users - Princes Freeway	1. Nearest residence 320m south of proposed unsealed tracks 2. Tea Tree Creek 600m east, Cannibal Creek 1.2km north 3. Princes Freeway 60m south	1. Affecting household amenity 2. Sedimentation of waterways. Reduction of light, reduction of gaseous exchange in plants 3. Obstructing vision of road users	1. Proximity to site	Possible	Major	18 Unacceptable	Dust will be largely limited to construction phase. Unsealed roads to be watered as required and internal speed limits adhered to. Works to cease when dust plumes extend over Princes Freeway	Number of complaints received from neighbours	Rare	Insignificant	10 Acceptable	NSW EPA Construction Site Guidance Note No air quality impact assessment has been conducted	NO	Number of complaints received
<i>TRAFFIC IMPACTS</i>	3	Impacts to the safety and function of the road network	Yes	No	1. Traffic network infrastructure	1. Princes Highway 60m south	1. Additional movements damaging infrastructure or increasing the risk of harm to humans, animals, fish or plants	1. Traffic Impact Assessment Report	Unlikely	Major	14 Unacceptable	Amber traffic assessment identifies that an auxiliary left turn (AUL) lane is required prior to the construction phase commencing	Construction phase will result in additional 118 vehicle movements per day. The road network is able to accommodate the additional traffic	Rare	Major	10 Acceptable	Amber Traffic Impact Assessment	NO	AUL to be constructed and Traffic Management Plan to be developed Number of accidents in this reach of the Freeway
<i>NOISE</i>	4	Noise generated from construction and operation of the BESS	Yes	Yes	1. Residential properties	Nearest residence ~320m south of BESS	Affecting household amenity	Noise Impact Assessment	Rare	Minor	3 Acceptable	None required - ERM assessment indicates that predicted noise levels at all nearest sensitive receptors comply with Noise Protocol noise limits for day, evening and night periods.	NSW Noise Policy for Industry 2017 threshold criteria Day 46 dB(A) Evening 41dB(A) Night 36dB(A)	Rare	Minor	3 Acceptable	ERM Noise Impact Assessment	NO	Number of complaints received
<i>BIODIVERSITY</i>	5	1. Loss of breeding or foraging habitat	Yes	No	1. Local waterways and water bodies	1. Cannibal Creek 1200m North 2. Tea Tree Creek 600m East 3. Farm dams 650m West	1. Physical loss of breeding and foraging habitat 2. Disturbance to breeding and foraging behaviour	1. ERM Ecological Assessment Report	Possible	Moderate	13 Unacceptable	Minimum of 200m buffer zones between known habitat of threatened species Impacts largely limited to construction phase	No impacts to no known habitat of threatened species - e.g. growing grass frog No removal of native vegetation is proposed	Rare	Moderate	6 Acceptable	ERM Ecological Assessment Report	NO	Pre-clearance survey results
<i>SURFACE WATERS</i>	6	1. Erosion 2. Pollution 3. Flood impacts	Yes	Yes	1. Local waterways - Cannibal Creek and 2. Tea Tree Creek	1. Cannibal Creek 1200m North 2. Tea Tree Creek 600m East	1. Changed overland flow patterns	1. Flood Assessment Report	Rare	Minor	3 Acceptable	Water Technology Flood Modelling Assessment indicates that most of the BESS is in a flood free area and represents a LOW flood risk The design includes a detention basin to detain water on site	Complete a post development flood Impact assessment at detailed design phase	Rare	Minor	3 Acceptable	Water Technology Flood Impact Assessment 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	NO	Completion of post development noise impact assessment Stormwater detention areas are to be located where the main flow paths converge - to be determined at detailed design stage

RISK REGISTER																			
Construction or Operational Hazard	Risk No.	Risk Event	Phase		Sensitive Receptors				Inherent Risk Assessment			Management Strategy Control Measures	Performance Targets	Residual Risk Assessment			Supporting/Reference Documentation	Land Use Conflict Y/N	Performance Monitoring
			Set up/ Construction	Operations / Production		Location and proximity to site	How hazard may harm or damage sensitive receptor	Evidence to support assessment	Likelihood	Consequence	Risk Rating			Likelihood	Consequence	Risk Rating			
GROUNDWATER	7	Groundwater interception during construction	Yes	No	1. Land forming and excavations for footings, earth pits and cable trenches	1. Shallow groundwater beneath the site 0-5m	1. Groundwater level and groundwater quality impacts	1. Visualising Victoria GW depth map	Unlikely	Moderate	9 Acceptable	Groundtruthing modelled depth to groundwater Servicing and refuelling vehicles to be within a dedicated compacted or sealed area Spill kits to be available on site Cut areas are to be minimised Footings to be <1m deep Land agreements specify that a minimum of 200mm of topsoil is to be imported over subsurface works at end of operational life to restore the land to a condition suitable for grazing	Volume of topsoil imported for rehabilitation purposes	Rare	Moderate	8 Acceptable	No groundwater assessment completed	NO	Compliance with civil cut and fill design
VISUAL AMENITY	8	1. Line of sight from neighbours 2. Impacts to road users	Yes	Yes	1. Dwellings 2. Road users	1. Dwellings within 320m of the project area 2. Road receptors within 60m of the project area	Impairment of existing visual amenity, landscape character and scenic quality	1. Landscape and Visual Impact Assessment	Unlikely	Minor	9 Acceptable	1. Site selection to minimise line of site opportunities 2. Screening plants if required	Impacts will remain negligible to low	Unlikely	Minor	9 Acceptable	Landform Landscape and Visual Impact Assessment	NO	Operator is to keep a complaints register and address visual amenity related complaints
WASTE MANAGEMENT	9	1. Waste generated from construction activity	Yes	No	1. Waste generated during construction	1. Immediate surrounding receiving environment 2. Road users	1. Soil contamination 2. Traffic accident	1. Waste Management Plan 2. CEMP	Unlikely	Major	14 Unacceptable	1. Waste during construction to be placed in appropriate vermin proof containers and regularly removed from site by appropriately licenced contractors	Compliance with CEMP	Rare	Major	10 Acceptable	CEMP and Waste Management Plan	NO	Degvelopment of a CEMP and Operational Management Plan Operator is to keep a complaints register and address waste related complaints within 48 hours

RISK REGISTER																			
Construction or Operational Hazard	Risk No.	Risk Event	Phase		Sensitive Receptors				Inherent Risk Assessment			Management Strategy Control Measures	Performance Targets	Residual Risk Assessment			Supporting/Reference Documentation	Land Use Conflict Y/N	Performance Monitoring
			Set up/ Construction	Operations / Production		Location and proximity to site	How hazard may harm or damage sensitive receptor	Evidence to support assessment	Likelihood	Consequence	Risk Rating			Likelihood	Consequence	Risk Rating			
STORAGE and TRANSPORT of HAZARDOUS SUBSTANCES and DANGEROUS GOODS	10	Exposure to Hazardous Substances and Dangerous Goods (DG)	Yes	Yes	1. Employees and contractor staff 2. Immediate vicinity of Dangerous Goods and Hazardous Substances	1. Immediate surrounding receiving environment	1. Hazardous substances and Dangerous Goods on site during construction phase 2. Hazardous substances and Dangerous Goods on site during construction phase	1. Planning Permit Application Table 4-6	Unlikely	Major	14 Unacceptable	Battery Management System to monitor and isolate individual batteries that are operating outside of programmed parameters. Isolation and shutdown can occur automatically, remotely or locally	Dangerous goods and hazardous substances to be stored according to the following guidance and legislation <i>National Occupational Health and Safety Commission - Storage and Handling of Workplace Dangerous Goods</i> <i>Dangerous Goods Act 1985</i> <i>Dangerous Goods (Storage and Handling) Regulations 2022</i> FRV Guideline GL-55 Battery Energy Storage Systems	Rare	Major	10 Acceptable	Emergency Response Management Plan to be developed	NO	Notification of DG manifest to VIC WorkSafe and Fire and Rescue VIC
BIOSECURITY	11	Introduction of 1. weeds 2. pests and 3. diseases	Yes	Yes	1. Immediate environment 2. Immediate and surrounding environment 3. Employees and contractors and herd	1. Areas that contractors and imported stock have access to 2. Host and surrounding farms 3. Staff , contractors and stock exposed to potential disease	Introduction of 1. weeds 2. pests and 3. diseases	ERM Planning Permit Report	Possible	Moderate	13 Unacceptable	All vehicles accessing the farm to be clean and free of mud and debris and restricted to dedicated internal roads Develop a biosecurity plan identifying actions in the instance of a biosecurity breach or outbreak of disease	Duties under the Plant Biosecurity Act 2010 (VIC) and Plant Biosecurity Regulations 2016 (VIC) Biosecurity Act 2015 (Cth)	Unlikely	Moderate	9 Acceptable	Disease management plan is included in the OMP Weed management plan is included in the OMP Pest management plan is included in the OMP	NO	Regular monitoring of pest, disease and weed burden
FIRE	12	Fire starting on the site or bushfire encroaching on the site	Yes	Yes	1. Employees, contractors and lessors 2. Stock and biological assets 3. Structures and dwellings	1. Immediate surrounding receiving environment	1. Loss of life 2. Loss of livestock 3. Loss of building assets	Risk Management Plan (including fire safety)	Rare	Critical	15 Unacceptable	Adherence to the risk mitigation actions contained within the report, being: 1. Inclusion of Asset Protection Zones (APZs) 2. Minimum standards for landscaping 3. Minimum standards for access roads 4. Dedicated static water supply for firefighting purposes 5. Electricity services to be underground 5. Drafting of a Bushfire Emergency Management and Operations Plan 6. Internal modular fire suppression systems in each battery container	Risk Management Plan (including fire safety study)	Rare	Major	10 Acceptable	Bushfire Assessment Report and accompanying recommendations	NO	Regular site assessments and control fuel loads surrounding structures Certification of the electrical components in the facility Regular inspection of fixed and mobile fire protection equipment

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