

Mologa Solar Farm and BESS

Environmental Management Plan Framework

May 2026

Prepared for: Potentia Energy

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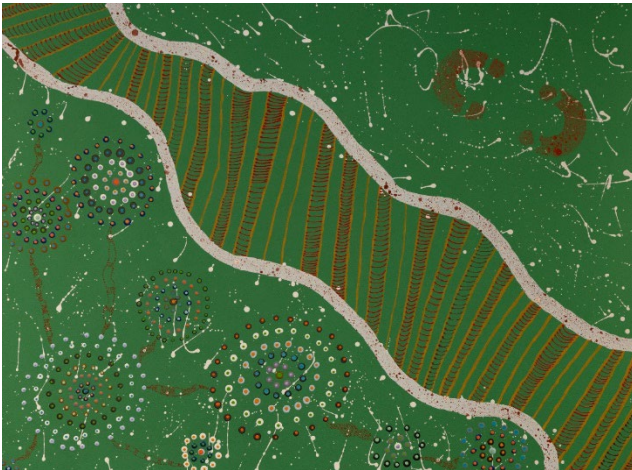
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Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

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1 Project description

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1 Project Description

1.1 Overview

The following Environmental Management Plan Framework (EMPF) has been prepared for the Mologa Solar Farm and Battery Energy Storage System (BESS) (the project) by Urbis Ltd, on behalf of Potentia Energy.

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

The Project is located across an approximately 591-hectare (ha) area comprised of nine parcels of privately-owned land and a government road in Mologa in the Loddon Shire local government area (LGA) in northern Victoria (the project area).

The proposed solar hybrid project comprises:

- A 250 MW solar photovoltaic (PV) facility
- A 250 MW, 4-hour Battery Energy Storage System (BESS)
- An on-site substation
- Mologa Terminal Station

A 220 kV transmission line easement runs north-south along the western portion of the site. The proposed BESS and substation will connect directly to this existing transmission infrastructure, enabling efficient integration with the electricity grid.

The facility will require the installation of the following infrastructure:

- Approximately 500,000 photovoltaic (PV) panels, mounted on tracking frames that are pile-driven into the ground without concrete foundations. The mounting posts are 'H' or 'Z' section steel piles, resulting in minimal ground disturbance and no requirement for bulk excavation. The panels will be mounted on single-axis tracking systems, allowing them to tilt and follow the sun from east to west throughout the day.
- Approximately 76 power conversion units (PCUs) mounted on metal piers (steel posts or columns rather than a full concrete slab). These units will be distributed throughout the panel array and will connect back to the BESS and substation.
- A Battery Energy Storage System and Substation Compound, within which the BESS units (approximately 272 containerised batteries and 68 inverters) will be installed on reinforced concrete hardstand pads, designed to accommodate structural loads and site-specific ground conditions.

The following infrastructure will be located within the compound:

- Containerised Battery Energy Storage System (BESS) modules
- A single transformer substation forming the on-site point of connection
- Ancillary buildings, including:
 - Control room
 - Switchgear room
 - Operations and maintenance (O&M) building
 - Workshop
 - Storage building
 - Dedicated water storage tanks
 - Fire protection infrastructure, including fire breaks, hydrants, suppression systems

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- The Mologa Terminal station (MGTS) is proposed to be connected into the existing overhead 220kV network between Kerang Terminal Station (KGTS) and Bendigo Terminal Station (BETS). The MGTS will contain three (3) bays with the space for up to eight (8) bays. Of the three bays, one will connect to the KGTS 220kV, one to the BETS and one connecting the on-site substation into the MGTS. Future works as part of the Mologa Terminal Station and remaining bays will be subject to relevant planning approvals
 - The scope of works for the MGTS includes the following Shared Network Assets:
 - Establishment of the MGTS including:
 - Bench and drainage.
 - Conduits and cable trench works.
 - Lighting protection.
 - Earth grid and structure earthing connections.
 - Station supplies.
 - Control room including:
 - Protection and control equipment.
 - Metering.
 - Low voltage AC and DC supplies.
 - Security systems (CCTV, security cabinet and cardex access).
 - VESDA and fire indication panel.
 - Air conditioning units.
 - Spare panels.
 - 220kV Switchyard including:
 - Benched area for two breaker and one-half diameters, including primary plant, interplant connection, marshalling boxes, GPO and lightning protection.
 - One breaker and one-half diameters installed as a double switched breaker bay to connect to the KGTS 220kV line.
 - One breaker and half diameter, installed with a single breaker in the bay, connecting BETS 220kV line and Potentia's overhead line.

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The project will also include the following ancillary infrastructure:

- Laydown areas for equipment, machinery, materials, waste storage, and stockpiling.
- Internal access roads will be constructed throughout the site to facilitate access to PV panels and electrical infrastructure for operation and maintenance activities. Internal access roads will comprise unsealed, compacted crushed-rock tracks constructed throughout the site to provide all-weather access for construction, operation, maintenance and emergency vehicles. The roads will be designed to minimise earthworks and follow existing ground contours where practicable.
- Perimeter fire breaks - generally comprise cleared and compacted mineral earth and/or crushed rock surfaces, maintained free of vegetation to provide fuel-free separation zones and emergency vehicle access
- Perimeter security fencing and lighting infrastructure
- Landscape buffers comprising high, medium, and low-density trees and shrubs, generally approximately 5 metres in width
- Water storage tanks for the solar farm component, located at designated emergency access points

Potential additional works to include:

- Underground and overhead electrical cabling – subject to final locations of PCU units.
- Drainage infrastructure, including swales, culverts, and sediment control measures – subject to final storm water management recommendations.
- Temporary construction facilities, including site offices and amenities – subject to final CMP

The project will contribute significantly to Victoria's renewable energy generation targets of 50% by 2030 and the reduction of greenhouse gas emissions (legislated to achieve net zero by 2050).

1.2 Subject site

The project area is located approximately 65km north of Bendigo and 51km west of Echuca and is currently used primarily for agricultural purposes. The project area and surrounding environment form part of a broader space used for rural and lifestyle farming and is characterised by large-sized, mostly cleared pastoral holdings across a generally flat topography.

The project area is zoned Farming (FZ) under the Loddon planning scheme and is bounded by Mologa-Durham Ox Road to the north, Mitiamo-Mologa Road to the east, and Bendigo-Pyramid Road (TR22) to the west. Old Church Road passes from north to south through the project area from Mologa-Durham Ox Road. Vehicle access is available via Old Church Road and all roads listed above. Old Church Road is accessible from the east (Mitiamo-Mologa Road) via Degills Lane and is accessible from the west (Bendigo-Pyramid Road) via Yarrowalla East Road.

Blind Creek runs through the eastern extent of the project area from north to south. There are several farm dams, and two sheds present in the project area. Canopy trees, including 9 scattered native trees are located to the east and southern boundary of the project area.

The subject site is approximately 591 hectares (ha) and is described by the following Certificates of Title:

- Crown Allotment 6 Section A Parish of Mologa.
 - Volume: 9056 & Folio: 961
- Crown Allotment 7 Section A Parish of Mologa
 - Volume: 2429 & Folio: 740
- Crown Allotment 8 Section A Parish of Mologa
 - Volume: 7628 & Folio: 185
- Crown Allotment 17 Section A Parish of Mologa
 - Volume: 9056 & Folio: 962
- Crown Allotment 17A, 18A, & 18 Section A Parish of Mologa
 - Volume: 10991 & Folio: 175
- Crown Allotment 17B Section A Parish of Mologa
 - Volume: 2667 & Folio: 397
- Crown Allotment 17C Section A Parish of Mologa
 - Volume: 10407 & Folio: 536

The project area is bounded to the south by the lot/parcel boundaries of (from east to west) 23~A\PP3145, 19A~A\PP3145, 19~A/PP3145 and 9~A\PP3145.

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Figure 1 The project area and surrounding environment



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1.3 Scope of work

1.3.1 Construction and operation details

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

Construction

- Approximately 300 workers during peak construction period(s).
- Approximately 18-24 month construction period, consisting of:
 - Site preparation and set-up
 - Civil works, including access track and hardstand construction
 - Component Delivery and Installation
 - Substation Delivery and Installation
 - Testing
- There will likely be some overlap between the above stages. A total of 18 to 24 months from initial construction to commencement of commercial operations is anticipated with construction commencing in 2028 (subject to receiving the required approvals).
- It is anticipated that approximately 80% of workers would arrive at the site via minibus (approximate 10-person occupancy) with 20% arriving in light vehicles (approximate 3-person average occupancy).
- It is expected that up to 88 light vehicle trips (44 inbound and 44 outbound) will be generated by construction staff vehicle movements per day at peak times. Conservatively assuming that all workers arrive and depart the site in the same hour, this results in:
 - Up to 24 inbound minibus movements and 20 inbound light vehicle movements during the AM peak hour,
 - Up to 24 outbound minibus movements and 20 outbound light vehicle movements during the PM peak hour.
- It is expected that up to 68 heavy vehicle trips (34 inbound and 34 outbound) will be generated by heavy vehicle movements (B-Doubles, Semis and Rigid Trucks) per day at peak times.

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Operation

- Up to 8 full-time employees for maintenance.

1.3.2 Decommissioning

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

The expected operational life of the Project is approximately 30-35 years and operations are anticipated to commence in 2030. Council and DTP will be notified within three (3) months of the solar farm and/or BESS permanently ceasing operation.

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

be sought for the retention of any items of infrastructure or other works (such as access tracks or the control building) that are suitable for the ongoing agricultural use of the land (or proposed alternative use).

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

The DMP will include, as a minimum:

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

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1.4 Timing of works

Works are expected to be conducted over five stages and are anticipated to commence in 2028, subject to receiving the required approvals. These stages and anticipated times are listed below:

- Stage 1: Site establishment and preparation
- Stage 2: Civil works for access track and hardstand construction
- Stage 3: Component delivery and installation
- Stage 4: Substation delivery and installation
- Stage 5: Commissioning (Hold Point testing)

There will be some overlap between the above stages.

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

Table 1 Temperature and rainfall averages

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Mean maximum (°C)	31.8	31.3	27.9	22.9	18.1	14.7	14.1	16.1	19.2	22.9	26.8	29.8	23.0
Mean minimum (°C)	15.3	15.2	13.0	9.5	6.7	4.6	4.0	4.9	6.6	8.8	11.4	13.5	9.5
Mean rainfall (mm)	24.6	23.1	26.8	26.5	35.3	35.7	34.5	36.4	35.1	37.2	30.0	27.8	373.0
Mean no. of days of rain ≥ 1 mm	2.8	2.4	2.8	3.5	5.2	6.2	6.8	6.7	5.7	5.4	4.0	3.3	54.8
Mean daily global solar exposure (kWh m²)	7.6	6.8	5.4	3.9	2.8	2.2	2.4	3.2	4.4	5.8	6.8	7.6	4.9

Source: Kerang weather station (ID 080023); solar exposure from Mincha weather station (080036) (dated 25 November 2025)

1.5 Site access

There are currently proposed to be approximately ten (10) vehicle access points to the site in order to comply with the Country Fire Authority (CFA) requirements.

Of the approximately ten (10) site access points, three (3) are proposed to be used for primary access (i.e., during construction, operation and decommissioning) and seven (7) are proposed to be used for emergency access:

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- Two (2) points providing site access from the west via Bendigo–Pyramid Road (TR22). Of the access points located along Bendigo–Pyramid Road:
 - Two (2) existing emergency access points proposed:
 - The southernmost existing access point proposed for emergency use is located approximately 2.18 km south of the intersection of Bendigo–Pyramid Road and Mologa–Durham Ox Road at the southwestern corner of the project area.
 - The northernmost existing access point proposed for emergency use is located approximately 840 m south of the intersection of Bendigo–Pyramid Road and Mologa–Durham Ox Road.
- Four (4) points providing site access from the north via Mologa–Durham Ox Road. Of the access points located along Mologa–Durham Ox Road:
 - One (1) proposed primary access point:
 - The proposed primary access point is located approximately 600 m east of the intersection of Mologa–Durham Ox Road and Bendigo–Pyramid Road.
 - One (1) proposed emergency access point:
 - The proposed emergency access point is located at the eastern edge of the transmission tower easement running north–south through the western portion of the project area, approximately 310 m east of the intersection of Mologa–Durham Ox Road and Bendigo–Pyramid Road.
 - Two (2) existing emergency access points:
 - The centrally located existing access point proposed for emergency use is located approximately 1.64 km east of the intersection of Mologa–Durham Ox Road and Bendigo–Pyramid Road.
 - The easternmost existing access point proposed for emergency use is located approximately 600 m west of the intersection of Mologa–Durham Ox Road and Bendigo–Pyramid Road.
- Four (4) points for accessing the site via Old Church Road. Of the access points located along Old Church Road:
 - One (1) proposed primary access point:
 - The proposed primary access point is located approximately 1.37 km south of the intersection of Mologa–Durham Ox Road and Old Church Road, at the southernmost extent of Old Church Road within the project area. This would provide primary access to the project area west of Old Church Road.
 - One (1) existing primary access point:
 - The existing access point proposed for primary use is located approximately 1.37 km south of the intersection of Mologa–Durham Ox Road and Old Church Road, at the southernmost extent of Old Church Road within the project area. This would provide primary access to the eastern portion of the project area, east of Old Church Road.
 - One (1) proposed emergency access point:
 - The proposed emergency access point is located approximately 720 m south of the intersection of Mologa–Durham Ox Road and Old Church Road and would provide access to the project area east of Old Church Road
 - One (1) existing emergency access point :
 - The existing access point proposed for emergency use is located approximately 720 m south of the intersection of Mologa–Durham Ox Road and Old Church Road and would provide access to the project area west of Old Church Road.

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Old Church Road passes from north to south through the eastern portion of the project area from Mologa-Durham Ox Road in the north and is accessible from the east from Degills Lane via Kerang-Mitiamo Road and is accessible from the west from Yarrowalla East Road via Bendigo-Pyramid Road.

All entry points will be designed to accommodate a CFA firefighting vehicle at a minimum.

1.6 Dilapidation survey

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

Before commencing construction, the contractor will conduct a dilapidation survey of the following roads used as haulage routes for construction:

- Mologa-Durham Ox Road between the proposed primary site access and Bendigo-Pyramid Road.
- Bendigo-Pyramid Road between Mologa-Durham Ox Road and Boort-Mitiamo Road.

The origin point for the over-size over-mass (OSOM) deliveries has not been finalised, however the preliminary route between the site and the Northern Highway traverses Echuca-Mitiamo Road and Bendigo-Pyramid Road.

The Northern Highway is pre-approved for the reference OSOM combination and provides good connections to other pre-approved routes including the Hume Freeway, Goulburn Valley Freeway and Murray Valley Highway (pending confirmation of the OSOM origin point).

The unladen OSOM vehicle will use the same preliminary route to exit the site to the Northern Highway.

It should be noted that the ultimate nature of the dilapidation surveys will be subject to agreement with Loddon Shire Council and DTP. A copy of the road dilapidation report shall be submitted to Council/DTP prior to the commencement of works and once construction works are completed.

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Project roles and

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2 Project roles and contacts

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

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

2.1 Construction

2.1.1 Project manager

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

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

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2.1.2 Construction site manager

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

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

2.1.3 Health, Safety and Environment (HSE) Coordinator

The appointed Project HSE (Health, Safety and Environment) Coordinator will report to the Site Manager. The EHS Coordinator will perform a key role in the implementation, maintenance, and monitoring of compliance to this EMP, of categorical importance for the health and safety of the employees on site during the construction lifecycle. Their main responsibilities are:

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

2.1.4 EPC contractors and sub-contractors

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

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2.2 Operation

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

2.2.1 Operation and maintenance site manager

- Ensure compliance with Integrated Management System of the company.
- Ensure this EMPF and other management plans are implemented.
- Review and update the EMPF and other management plans as required.
- Carry out site inspections and environmental monitoring.
- Maintain complaints register and respond to complaints.
- Manage incident response.
- Investigate incidents and identify preventative actions.
- Notify the company management of incidents and non-compliances.

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- Participate in Independent Environmental Audit and implement recommendations.
- Responsible for overseeing HSE management of the operation activities.

2.2.2 Operation and maintenance contractors

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

2.3 Project contacts

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

Table 2 Project roles and contacts

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

Table 2 is to be populated by Potentia Energy following contract award and project resourcing prior to construction commencing and notification will be issued to DTP, Council and all relevant parties.

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Environmental strategy

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3 Environmental strategy

3.1.1 Summary of statutory legislation

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

Table 3 State and Commonwealth legislation and relevance to project

Legislation	Details
Environment Protection and Biodiversity Conservation Act 1999 (Cwth)	Works to progress in accordance with requirements in order to avoid impacts on Matters of National Environmental Significance (MNES). The project is unlikely to impact on any MNES, however, a self referral will occur to provide a definitive conclusion that the project is not a controlled action under the EPBC Act.
Environment Effects Act 1978	Requires certain public works to have an environmental impact assessment carried out before proceeding. The Project does not trigger the need for an EES Referral.
Planning and Environment Act 1987	Legislation under which the Project permit would be issued if approved.
Flora and Fauna Guarantee Act 1988	Key piece of Victorian legislation for the conservation of threatened species and communities and for the management of potentially threatening processes. Works to progress in accordance with biodiversity requirements in order to avoid unauthorised impacts on these matters.
Catchment and Land Protection Act 1994	The CaLP Act identifies and classifies certain species as noxious weeds or pest animals and provides a system of controls on noxious species.
Wildlife Act 1975	Framework for members of the community wishing to control, possess, display, breed, trade-in or interact with wildlife.
Aboriginal Heritage Act 2006	Urbis is currently preparing a mandatory Cultural Heritage Management Plan 20827 with the Registered Aboriginal Party, the Dja Dja Wurrung Clans Aboriginal Corporation A chance finds / unexpected finds protocol will be prepared as part of CHMP 20827 to outline obligations under this Act.
Climate Change Act 2017	The Act outlines Victoria's long-term carbon emission targets to achieve Net Zero. The proposal is consistent with the Act and would help achieve these objectives, as outlined in Section 4.11.

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Legislation	Details
Environment Protection Act 2017	The Act defines how the Environment Protection Authority Victoria (EPA) works as an independent statutory authority. Subordinate legislation such as regulations sit under this Act.

3.2 Communications, reporting and responding to environmental complaints

Urbis has been engaged on behalf of Potentia Energy to undertake consultation with Council, relevant agencies and the local community, including affected surrounding landowners.

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

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

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

An online form, email address and phone numbers are provided on the project webpage to receive feedback and complaints from the community, if any environmental concerns are raised regarding construction and operational phases. All received complaints will be recorded to analyse possible non-compliance and will be responded to, if relevant, with mitigation actions to address possible environmental and/or community impacts.

3.3 Monitoring and auditing

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

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

Environmental monitoring requirements are to be established prior to and during construction and during operation of the solar farm and BESS to include:

- Acoustic assessment to comply with operational noise criteria in accordance with *Part 1A(2): Noise limits – Rural area method of EPA Publication 1826.5*.
- Cultural heritage finds.
- Dust generation monitoring.
- Water quality monitoring.
- Any other matters identified in the EMP.

3.4 Environmental awareness training

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

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

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

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

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

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

3.5 Incident reporting

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

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

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

3.6 Annual reporting

Within 12 months of the approval and annually thereafter an Annual Environmental Management Report is to be prepared to ensure compliance with approval conditions and would need to be provided should the project be audited. The report must address the matters required by the project approval plus the matters identified below:

- Identify the standards and performance measures that apply to the project.
- Describe the works carried out in the last 12 months.
- Describe the works that will be carried out in the next 12 months.
- Include a summary of the complaints received during the past year and compare this to the complaints received in previous years (if any).

- Include a summary of the monitoring results for the project during the past year.
- Include an analysis of these monitoring results against the relevant:
 - Impact assessment criteria/limits.
 - Monitoring results from previous years as per relevant management plans.
- Identify any trends in the monitoring results over the life of the project.
- Identify any non-compliance during the previous year.
- Describe what actions were, or are being, taken to ensure compliance.

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Environmental risk

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management

4 Environmental risk management

4.1 Air quality

Objectives

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

Management strategies and controls

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

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

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

4.2 Biodiversity

Objectives

The main objectives of this section of the EMP framework are to ensure protection of native vegetation related to the planning permit and limit impacts where possible. Four species of weeds were identified within the subject site, two of which (African boxthorn *Lycium ferocissimum* and Paterson's Curse *Echium plantagineum*) are listed as 'Regionally Controlled Weeds' under the *Catchment and Land Protection Act 1994*. As such, mitigation measures to avoid their propagation are also proposed. This section also relates to the landscape plan, to ensure management measures for newly planted vegetation.

Other species of weed not listed under the *Catchment and Land Protection Act 1994* include Wimmera Rye-grass *Lolium rigidum* (also known as Annual rye-grass) and Trailing African Daisy *Dimorphotheca fruticosa*. Whilst these species are not listed under the *Catchment and Land Protection Act 1994*, management of these weed species is required in order to reduce potential impacts to native vegetation and to maintain agricultural productivity of the land,

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In particular, Wimmera rye-grass is associated with 'Annual Ryegrass Toxicity' in livestock. As the project is intended to include agrisolar opportunities in the form of livestock (sheep) grazing during operations, appropriate measures to prevent proliferation of this species are required to avoid and minimise potential impacts to agricultural land uses.

Management strategies and controls

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

- Before work begins, all personnel undertaking works relating to, or potentially impacting flora and fauna will be made aware of all relevant permit conditions and associated statutory requirements or approvals.
- In accordance with AS4970-2009, before any works start, including removal of native vegetation, temporary fences, or similar where appropriate, will be installed around areas of retained native vegetation to protect them from any accidental impacts. The fencing will be constructed of star pickets and plain wire, strong webbing, or other clearly visible and durable materials.
- Where possible, construction stockpiles, machinery, internal roads, and other infrastructure should be placed away from areas supporting retained native vegetation.
- A minimum 30-metre buffer to Blind Creek and minimum 5-metre landscape buffer around areas of native vegetation and site boundaries.
- Installation of appropriate exclusion fencing and sediment controls around retained waterways, watercourses and wetlands vegetation. Sediment controls should be monitored weekly or after intense rainfall events.
- All retained wet areas, farm dams, and drainage lines should be fenced off, or similar where appropriate, to reduce the risk of personnel or equipment entering these areas and spreading weeds and/or pathogens (i.e., chytrid fungus). Part of the planning and construction site protocols are to be present around these areas and other waterways. These should be monitored and enforced by the EPC Project Manager.
- Removal of any habitat trees or shrubs (particularly hollow-bearing trees or trees/shrubs with nests) should be undertaken between February and September to avoid the breeding season for most fauna species. A licenced wildlife salvage team should be on-site during tree removal to catch and relocate (if appropriate) any wildlife encountered in hollow-bearing trees or dams. If any native wildlife is found injured or stressed at the worksite, then the site supervisor should contact WIRES 1300 094 737.
- Implementation of Tree Protection Zones (TPZs) to prevent indirect losses of native vegetation during construction activities.
- As indigenous flora provides valuable habitat for indigenous fauna, it is recommended that any landscape plantings that are undertaken as part of the proposed works are conducted using indigenous species sourced from a local provenance.
- Installation of wildlife-friendly fencing should be provided for linear woodland patches.
- All construction personnel should be aware of ecologically sensitive areas to minimise the likelihood of inadvertent disturbance to areas marked for retention. Native vegetation (areas of sensitivity) should be included as a mapping overlay on any construction plans.
- Ensure that vehicle wheels and machinery entering the site do not carry weed plant material or seeds.
- Ensure that areas with declared noxious weeds (as well as non-declared weeds, such as Wimmera rye-grass) are properly cleared and treated if possible, avoiding accidental propagation of seedlings.
- Sterile exotic crops or native ground cover species should be considered, where practical if plantings are required beneath solar panels to minimise the impact of weed incursion into retained native vegetation.

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- All material stockpiles, vehicle parking and machinery storage will be located within cleared areas or areas proposed for clearing, away from ecological sensitive areas.

4.3 Fire and hazards

Objectives

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

Management strategies and controls

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

- The Emergency Management Plan must adhere to the Bushfire Risk Assessment and regard given to the CFA's Guideline for Renewable Energy Installations.
- Safe distances are to be maintained to electricity transmission lines.
- The internal road network has been designed to accommodate a standard CFA fire truck. Passing bays are located at least every 500 metres. Roads provide extensive access to the BESS, substation, and panel areas.
- 45,000L litre static water supply tanks at the primary vehicle entrance to each part of the facility.
- A 5-metre-wide landscape buffer is proposed around the boundary of the site to screen the solar energy facility and BESS from view. This planting is not considered to be a fire risk due to its narrow width and location at least 20 metres from solar panels and other infrastructure.
- 10-metre-wide perimeter fire breaks have been incorporated around the entire proposal, which will be trafficable, to ensure appropriate separations from the solar panel extent.
- All fire breaks must be free of vegetation and, at all times, no plant material or equipment of any kind is to be stored in the fire breaks.

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4.4 Heritage

Objectives

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

Management strategies and controls

Subject to final approval, it is anticipated that the following strategies and controls will be undertaken, as required. These include a summary of the measures outlined in the Cultural Heritage Management Plan (CHMP) to identify and protect any Aboriginal Cultural Heritage Items that could exist on the site.

- Cultural Heritage Induction for all site contractors and sub-contractors prior to the commencement of any works. The induction must be facilitated by a representative of the Dja Dja Wurrung Clans Aboriginal Corporation (DJAARA) and assisted by a Heritage Advisor. Details about the induction process should be followed as outlined in the CHMP.
- Prior to any works, DJAARA must be notified at least 10 days prior to the commencement of works. Similarly, DJAARA must be notified in no later than 10 business days after all works have been completed.
- A copy of the approved CHMP must be available and present onsite for the duration of the works.
- Information regarding Aboriginal Cultural Heritage, including the CHMP should be treated as Sensitive Information and not be distributed in any way without DJAARA's written permission.

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- A total of 3 heritage inspections must be undertaken throughout the duration of the works (subject to the conditions and recommendations of the CHMP). The Registered Aboriginal Party (RAP) must provide at least 3 business days' notice prior to the time they wish to enter the Activity Area.
- All material collected during the preparation of the CHMP from the Activity Area must be returned to DJAARA within 3 months of the approval of the CHMP. The RAP will be the caretakers of the Aboriginal cultural heritage and may choose to rebury the artifacts within an agreed location, as outlined in the CHMP.
- Heritage Advisors have the opportunity to complete artifact analysis at the DJAARA office with assistance from the Field Services Officers (FSOs), this is preferential to DJAARA. DJAARA requires 5 days' notice to book the office space.
- When the design and construction methodology for the Solar Farm and BESS are finalised, and before the commencement of the works, a meeting must be held between the Project Manager, Site Manager and the RAP. The purpose of the meeting is to discuss the location, nature and extent of any ground-disturbing works and determine the locations that will be either salvaged or avoided.
- No Works within Updated Areas of Potential and Registered Aboriginal Places should be undertaken as outlined in the CHMP. Fencing should be erected and these matters discussed during the induction session.
- If Salvage Zones as determined by the CHMP are to be impacted, archaeological salvaging will be undertaken following the methodology outlined in the CHMP.
- Contingency Plans for unexpected discoveries of Aboriginal Cultural Heritage and dispute resolution will need to follow matters as outlined in the CHMP.
- A non-compliance might trigger the requirement for a cultural heritage audit under Part 6 of the *Aboriginal Heritage Act 2006*. If non-compliance is identified, the following measures need to be undertaken:
 - Cease all works within the Activity Area.
 - Notify the RAP and First Peoples – State Relations (FP-SR) at the following email address: compliance.aboriginalvictoria@dpc.vic.gov.au
 - Follow the contingency plans within the CHMP for discovery of unidentified Aboriginal Cultural Heritage during the works.
 - Prepare a program of remedial action in consultation with the RAP, Project Manager, Site Manager, and a Heritage Advisor if required.

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4.5 Noise and vibration

Objectives

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

Management strategies and controls

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

Table 4 Applicable project noise limits

Periods (as defined in EPA 1826)	Noise level limit(dB)
Day 7:00–18:00 Monday–Saturday	45
Evening 18:00–22:00 Monday–Saturday	39

Periods (as defined in EPA 1826)**Noise level limit(dB)**

	7:00-22:00 Sundays and public holidays	
Night	22:00-7:00 All days	34

- Construction work will be undertaken, when scheduled, during 7:00am to 6:00pm Monday to Saturday. No work will be carried out on Sundays or Public Holidays unless separate approvals have been obtained.
- Potentially impacted neighbours will be notified at least 14 days prior to construction commencing.
- Within the first year of operational life after construction, a Post-Construction Acoustic Assessment will be prepared and submitted to the responsible authority.
- Consideration will be given during selection of equipment with a lower sound power level where possible. Use low-noise saw blades where possible.
- Connect to the electricity grid as early as possible to avoid the use of diesel generators.
- Sequencing operations so that vibration-causing activities do not occur simultaneously.

4.6 Soil and water

Objectives

The main objectives of this section of the EMPF framework are to outline measures to manage potential flood, surface water quality and stormwater runoff, to ensure appropriate site drainage without altering flooding regimes to surrounding sites and prevent unnecessary soil disturbance.

Management strategies and controls

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

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

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4.7 Traffic and transport

Objectives

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

Management strategies and controls

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

- Internal site access roads are designed and are to be constructed to the minimum requirements of the CFA as set out in the *CFA Design Guidelines and Model Requirements for Renewable Energy Facilities (Version 4, 2023)*.
- Vehicle maintenance and monitoring controls to be undertaken by the EPC contractors and sub-contractors.
- Noise controls to be installed where reasonable and practicable.
- Schedule for construction vehicle movements to be consistent with the standard working hours (7:00 and 18:00 Monday to Saturday) for all stages. Any site access required during operational period will generally be Monday to Friday between 6:00 and 16:00 but may occasionally take place on Saturdays if necessary.
- Consultation plans with the local community to monitor and respond to traffic complaints (if received).
- Confirmation of expected traffic volumes generated by the solar farm for all work stages.
- Identification of all Heavy Vehicle (H/V) and Over Dimensional (OD) vehicle haulage routes for all work stages.
- A mechanism to review identified haulage route road conditions prior to the commencement of works.
- Mechanisms/agreements (if deemed necessary) to maintain haulage route roads and road infrastructure, including local public roads used by site traffic, during construction works and to reinstate roads to at least pre-construction conditions.
- Qualify any requirement for specific work stage construction traffic management plans.
- Qualify and identify any relevant mechanisms for OD vehicle permits and traffic management requirements.
- Confirm on-site the adequacy of available sight distances along all proposed site access locations and intersections.

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4.8 Visual amenity and light spill

Objectives

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

Management strategies and controls

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

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- Urgent maintenance works during hours of darkness may require external security lights. Any operation during darkness hours should have consideration to lighting impacts on adjacent receivers when possible.
- All lighting installed and operated at the site must comply with *AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting*.
- Landscaping will be implemented in accordance with the Landscaping Strategy to ameliorate any possible visual and glint and glare impacts on adjacent receivers.
- Using non reflective or muted toned materials for the transmission towers, if possible.

4.9 Waste

Objectives

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

Management strategies and controls

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

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

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4.10 Environmental management systems

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

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

- Leadership and commitment.
- Environmental policy.

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

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

Potentia Energy has an integrated management system (IMS) policy, comprising of health, safety, environmental and quality commitments.

Within this policy, Potentia Energy commits to Providing an Environmentally Compliant workplace, by achieving the following objectives:

- Providing instruction, training, and coaching to improve awareness and sense of responsibility, and adopt environmentally compliant behaviour.
- Applying appropriate controls to eliminate or mitigate environmental impact as far as is reasonably practicable when developing, constructing, operating and maintaining power plants and selling electricity, applying all controls required under applicable environmental legislation.
- Continually improving the IMS management system by applying a "plan, do, check, act" methodology, which shall include evaluation of performance metrics by Top Management in relation to Environmental performance

Potentia also commits to Protecting the Environment within its operations, though:

- Preventing Pollution
- Sustainable Resource Use
- Protection of Biodiversity

Potentia Energy is also certified to ISO45001, ISO 14001 and ISO9001.

4.11 Sustainability and climate

The proposed solar farm and BESS would greatly contribute towards achieving Victoria's climate targets for 2030 and net zero by 2050. With approximately 250 MW of installed peak PV power, this would allow Victoria to meet around 10.4% of the 2030 Renewable Energy Storage Target of 2.6 GW for 2030 and just under 4% of the 2035 target of 6.3 GW.

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Disclaimer

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