

**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**



23 July 2026

Divyaa Sundaravadivel
Senior Planner, Energy Assessment
The Department of Transport and Planning
Lodged via online

**ADVERTISED
PLAN**

Dear Divyaa,

Planning Permit Application PA2604389 – Mologa Solar Hybrid – RFI Response

1 Introduction

Urbis continues to act on behalf of the permit applicant, Potentia Energy Pty Ltd in relation to planning permit application PA2604389 at Bendigo–Pyramid Road & Mologa–Durham Ox Road

We write in response to Council's Request for Further Information (RFI) dated 15 June 2026 and the preliminary comments received.

In support of this submission, please find enclosed:

- Combined Certificate of Title
- Updated Application Form
- Amended Town Planning Report prepared by Urbis, and dated 23 July 2026
- Site Plan prepared by Urbis, and dated 23 July 2026
- Landscape Strategy prepared by Urbis, and dated 23 July 2026
- Elevations and Specifications prepared by Urbis, and dated 23 July 2026
- Biodiversity Impact Assessment prepared by Ecology Systems, and dated 1 June 2026
- Bushfire Risk Assessment prepared by Ecology and Heritage Partners, dated 29 June 2026
- Risk Management Plan prepared by Ecology and Heritage Partners, dated 29 June 2026
- Noise Impact Assessment prepared by WSP, dated 23 July 2026
- Updated Hydrology and Irrigation District Assessment prepared by Ecological Australia, dated 23 July 2026
- Updated Transport Impact Assessment prepared by Urbis, dated 23 July 2026
- Updated Visual Impact Assessment prepared by Urbis, dated 23 July 2026

ADVERTISED PLAN



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

2 RFI Response

The table below provides a response to each of Council's RFI items.

Table 1 – RFI Response

RFI ITEM	Response and Document Reference
1. <i>The application form amended to include all correct landowners, all lots associated with this project, and all permit triggers, including clause 52.29-2.</i> <i>Note: If it is simpler than adding all addresses to the amended application form, a list of all lots impacted by the proposal can be included in a cover letter, and the amended application form can state 'refer to attached letter'</i>	Please refer to the updated application form.
2. <i>A full copy of all certificates of titles, title plans, and section 72 (1) agreement (Instrument X210216E) under the Conservation Forest and Lands Act 1987 (searched within the past 30 days). Any section 173 agreements and/or covenants listed on the register search statement, and all relevant associated documents must be provided.</i>	A full copy of all certificates of titles and associated covenants have been provided.
3. <i>Amend development plans to scale to show the following:</i>	Please refer to the enclosed updated Site Plans, Elevations & Specifications.
a. <i>Separate site plan to show all the land parcels associated with the project</i>	Please refer to the enclosed site plan which includes all the land parcels associated with the project.
b. <i>Location of native vegetation to be removed and retained for the proposal</i>	Please refer to the enclosed separate Tree Retention & Removal Plan, within the overall Site Plan package.
c. <i>Location of car parking area, warehouse and workshop shown on site plan</i>	The car parking, warehouse and workshop will be located within the O&M footprint, which is showed on the Site Plan as a hatched area. The O&M layouts will be informed by final detailed design which is done after the planning permit is approved.

ADVERTISED PLAN



		The applicant is willing to accept a condition on the permit that endorsed plans nominate the location of carparking and buildings within the O&M area. Refer to section 3.2 of the Town Planning Report.
d.	<i>All existing and proposed crossovers to be labelled for primary or emergency use</i>	The Site Plans have been updated to include all existing and proposed crossovers to be labelled for primary or emergency use.
e.	<i>Indicative floor layout and elevation plans for the terminal station, O&M facilities, control rooms, workshop, and warehouse</i>	The detailed information requested is not considered to be required at this stage as this will be completed and confirmed at the detailed design stage and submitted to DTP at permit endorsement stage. Ample information has been provided at this stage of the application process.
f.	<i>Update the indicative substation details plan to show the dimensions of the BESS units and PCU, and all components to be labelled on the indicative power transformer plan.</i>	Please refer to drawings 905-DE and 906-DE in the Elevations & Specifications package, which have been updated to include additional information on the BESS units and PCU dimensions. Further detail is not considered to be required at this stage and will be provided as part of the detailed engineering drawings at permit endorsement stage.
g.	<i>Elevation plan for the proposed grid connection infrastructure (e.g. powerlines)</i>	The grid connection will be directly to the new terminal station through an overhead line. This has been annotated on both the Site Plans and the Elevations & Specifications.
h.	<i>Plan notation to detail the resting angle of the solar panels</i>	The resting angle (60 degrees) has now been included on the Site Plans as an annotation and on the Elevations in drawing no. 901-DE.

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

ADVERTISED PLAN



i	Any bushfire and noise mitigation measures	Bushfire mitigation measures are already included on the Site Plans, in the form of the emergency accesses, water tanks, fire buffers. Please refer to the legend which confirms all these measures are currently shown.
j	Location and dimension of business identification sign(s)	Please refer to the Elevations & Specifications on Drawing No. 903-DE which includes the dimensions of the business identification signs, along with the location of the signage shown on the Site Plan.
4.	Amend Planning Report to address the following:	Please refer to the enclosed updated Planning Report.
a.	Assessment under the relevant decision guidelines for permit trigger under clauses 52.05, 52.17, 52.19, or Loddon Planning Scheme	Please refer to section 6.12 for an assessment against Clause 52.05 and the last sub-section for an assessment against Clause 52.17 decision guidelines. A permit is not triggered pursuant to Clause 52.29 as there is no new or altered access to a TR22 road proposed and has been removed from the proposal / report.
b.	Confirm whether a mandatory or voluntary CHMP is required Note: There are several inconsistencies throughout the report.	The CHMP is confirmed to be mandatory, and this is reflected in the updated Town Planning Report.
c.	Details of the proposed outcome for the existing outbuildings on site, including whether these buildings will be demolished, decommissioned, or retained	Refer to Section 3 – Proposal, which expresses that the outbuildings will be retained.
d.	Update section 3.1.6 to explain in detail how the proposal will connect to the grid network, including the location, extent and nature of any proposed	Section 3.1.6 has been updated to express that the grid connection will be from the Terminal Station on site directly

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

ADVERTISED PLAN



	overhead or underground transmission lines and associated infrastructure	to the 220kV transmission line that runs north-south through the site.
e.	Provide a response to Clause 14.02 of the Loddon Planning Scheme, including whether the proposal can meet the minimum 50m vegetated buffer zones along each side of a waterway under Clause 14.02-1S. Where the minimum buffer cannot be met, please provide justifications demonstrating why the proposed buffer distance is acceptable	Please refer to Section 6.5 (Planning Policy Framework) for a response to Clause 14.02-1S. In accordance with this policy a 50-metre setback from Blind Creek is provided. There are other drainage channels and natural depressions that connect dams across the site which are not defined as waterways as per Planning Practice Note 97 – Strategic planning for waterways (PPN97) and 5 metre setbacks are provided to these channels.
f.	Confirm if the proposal complies with the restrictions outlined in section 72(1) agreement Conservation Forest and Lands Act 1987 for Crown Allotment 17C Section A Parish of Mologa	Please refer to Section 3.2.3 of the Town Planning Report. The proposal complies with the restrictions outlined in the Section 72(1) Agreement under the Conservation, Forests and Lands Act 1987 (Instrument X210216E, dated 14 December 2000). The agreement applies to native vegetation and land within Crown Allotment 17C, Section A, Parish of Mologa. No development is proposed within this Crown Allotment and will continue to be fenced off. Accordingly, the proposed development will continue to comply with the restrictions applying to that land.
	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	
g.		Please refer to Section 6.1 which now includes a GHG Emissions Reduction Benefits section and Appendix S within the Town Planning Report.
5.	Amend NIA to address the following:	See below. Please refer to the updated Noise impact Assessment prepared by WSP.

ADVERTISED PLAN



a. <i>Confirm whether the assumptions, such as the infrastructure is operating at full capacity (100%) (e.g. cooling fans etc.)</i>	The Noise Impact Assessment has been updated to adopt conservative modelling inputs and methods, as described in Section 4.1, based on anticipated worst-case operating conditions. This approach allows the infrastructure to charge and discharge over a 24-hour period without operational restriction while demonstrating compliance with the relevant EPA noise limits. The infrastructure is not expected to operate continuously at full capacity (100%), and operational management measures will be implemented during site operation to ensure compliance with the applicable noise criteria is achieved and verified.
b. <i>Confirm whether the proposal includes a 7m noise barrier wall, and whether this mitigation measure has been incorporated into the noise modelling and predictions. Note, if this is proposed, it should be detailed on the plans</i> 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	As outlined in Section 4.1.2, a conceptual 7-metre noise wall was modelled to assess its effectiveness in reducing operational noise levels. The modelling indicated that the barrier would achieve only around a 1 dB reduction in noise levels. Given the limited acoustic benefit relative to the scale and material extent of the structure required, noise barriers were determined to be an unreasonable and impractical mitigation measure. Accordingly, noise barriers have been excluded from the noise assessment and are not incorporated into the project design. This has been clarified in Section 4.1.2 and reflected in the prediction tables presented in Section 5 of the report.
c. <i>Provide a separate table presenting the predicted noise levels without any noise mitigation measure (i.e. noise barrier wall) to demonstrate the effectiveness of the proposed mitigation</i>	As outlined above, modelling demonstrated that the conceptual noise wall would provide only a marginal reduction in noise impacts. On this basis, the noise wall was not

ADVERTISED PLAN



Note: It is unclear whether the proposal includes a 7m noise barrier wall. This mitigation measure is not shown on the development plans and is not referenced in the Planning Report.

considered an effective or practical mitigation measure and has therefore not been included in the operational noise modelling or proposed as part of the project design, as reflected in the development plans and Town Planning Report.

No updates to the prediction tables were required, as noise barriers were not included as part of the assessed scenario. This has been clarified in the report.

6.

Amend Bushfire Risk Assessment and Risk Management Plan to ensure it reflects the latest CFA Design Guidelines and Model Requirements for Renewable Energy Facilities (Version 4.4, June 2025).

Please refer to the enclosed updated Bushfire Risk Assessment and Risk Management Plan which now specifies the latest CFA Design Guidelines and Model Requirements for Renewable Energy Facilities (Version 4.4, June 2025). We confirm the Bushfire Risk Assessment and Risk Management Plan were assessed against the 2025 version.

This update assessment to be made available for the public and Model 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

7.

Amend BIA to confirm whether any proposed works, including but not limited to, creation of vehicle access points, will impact or require the removal of native vegetation. If so, please update the NVRP accordingly and update the avoid and minimise statement to satisfy the Guidelines.

Please refer to the enclosed updated Biodiversity Impact Assessment.

Note: The submitted BIA assesses a previous version of the proposal comprising 7 access points, whereas the current proposal includes 10 access points, as referenced in the Traffic Impact Assessment.

8.

Preliminary Assessment, comments raised for consideration:

See below.

a.

The suitability of the site will require careful consideration given its location within a declared irrigation district. Clause 14.02-3S seeks to protect the future viability of irrigation districts by preventing non-agricultural uses on land serviced, or formerly serviced, by irrigation infrastructure. DTP notes that

Justification in relation to Clause 14.02-3S is provided in Section 6.6 of the Town Planning Report.

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



there is limited policy support for renewable energy facilities and associated utility installations within declared irrigation districts.

- b. *It is recommended that you consider whether the submitted technical reports should be updated to consider any cumulative impacts associated with the approved Prairie Solar Farm (approx. 5.2km from subject site), including but not limited to traffic, glint and glare, noise, and visual impacts. Alternatively, the Planning Report can be updated to factor any cumulative impacts.*

Given the separation distance of more than 5 km between the Prairie Solar Farm and the subject site, adverse cumulative impacts are not anticipated and a detailed cumulative impact assessment is not considered necessary.

Glint and glare impacts from the proposed development are contained within the site and have been appropriately mitigated through design measures. As a result, the development is not expected to generate cumulative glint and glare impacts in combination with the Prairie Solar Farm.

In relation to visual impacts, proposed landscaping and screening measures will provide an effective visual buffer for nearby neighbours and other sensitive interfaces. Given the distance between the two developments, the Prairie Solar Farm is not expected to contribute to any cumulative visual impact.

Noise emissions associated with the development are expected to remain within the site boundaries. Accordingly, cumulative noise impacts are not anticipated.

With respect to traffic, there is potential for increased traffic volumes should construction of both developments occur concurrently. However, as the timing and overlap of construction activities cannot be confirmed at this stage, a cumulative traffic impact assessment is not currently possible.

**ADVERTISED
PLAN**

ADVERTISED PLAN



c. <i>The application has been referred to the following referral authorities:</i> ▪ <i>WorkSafe Victoria (determining)</i> ▪ <i>Head, TfV (determining)</i> ▪ <i>DEECA Water (recommending)</i> ▪ <i>North Central CMA (recommending)</i> ▪ <i>DEECA (intradepartmental advice for native vegetation)</i>	WorkSafe Victoria (determining) - Still awaiting referral response. Head, TfV (determining) - No objection, Conditional agreement. DEECA Water (recommending) - Object to granting of a planning permit. However, we note DEECA Water are not a determining authority. Justification in relation to Clause 14.02-3S is provided in Section 6.6 of the Town Planning Report. North Central CMA (recommending) - See in table below for response. DEECA (intradepartmental advice for native vegetation) - Please refer to the updated Biodiversity Impact Assessment which includes the required changes from DEECA. The applicant accepts the conditions provided from DEECA. Ausnet - Noted.
---	---

d. <i>Please ensure that all application documents are consistent, and that any updates/amendments made to the development plans in response to the above are consistent with the relevant assessments (e.g., ensure the infrastructure assessed in the noise report is the same as that which is shown on the plans).</i> <i>It is noted that the submitted technical reports do not reference the latest version of the site plan or include all addresses associated with this project. It is suggested that reference to 5 Mitiamo-Kerang</i>	All application documentation is consistent.
---	---

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

Road, Mologa, be removed as a standalone project reference.

3 Referral Response

The table below provides a response to each of the Referral Authorities items.

Table 2 – Referral Response

RFI ITEM	Response and Document Reference
North Central CMA	
1. Amended plans which locate development a minimum of 50 metres from the banks of waterways, in accordance with Clause 12.03-1S and 14.02-1S of the Campaspe Planning Scheme.	Please refer to Section 6.5 (Planning Policy Framework) for a response to Clause 14.02-1S. A 50-metre setback from Blind Creek has been included in the updated Site Plans to be in accordance with Clause 12.03-1S and 14.02-1S of the Campaspe Planning Scheme.
2. The flood modelling must be updated to consider the impacts of breakout flows from adjacent catchments that occur, particularly the Loddon River, which impacts the subject site. Additionally, the modelling must consider the potential change in hydraulic roughness due to the solar panels proposed across the majority of the site. The modelling must consider the effects of climate change in accordance with Australian Rainfall and Runoff 2019. Model input and output files must be provided to the North Central CMA for review, including flood levels, depths, velocities, hazard, DEMs and afflux layers.	The lodged Hydrology Assessment adopted a rain-on-grid modelling approach for the local contributing catchment area. This approach was informed by the LSIO and 1% AEP flood mapping available via VicPlan, which indicates breakout flooding from the Loddon River is unlikely to impact the site. Accordingly, the existing modelling does not include the Loddon River system. There are currently no established guidelines for assigning hydraulic roughness parameters to solar farm developments. As the proposed PV arrays are elevated above ground level, it is considered unlikely they would materially affect site hydrology or hydraulics. The existing Hydrology Assessment includes a roughness sensitivity assessment, which supports the adopted Manning's roughness coefficient of 0.035 as a conservative assumption. The lodged Hydrology Assessment considered climate change in accordance with ARR2019 guidance, including modelling of the 1% AEP event under SSP1-2.6, SSP2-4.5 and SSP3-7.0 scenarios. Results are presented in Section 5.2 of the report.

Requested model inputs and outputs have been provided via the shared OneDrive link in the email provided to Divyaa.

4 Conclusion

We trust this information is sufficient to assist you with your continued assessment of this application.

Should any of the requested information not be satisfied or remain outstanding, we respectfully request a one (1) month extension on behalf of the permit applicant to provide the requested information under Section 54A of the *Planning and Environment Act 1987*.

If you have any questions or require any additional information, please do not hesitate to contact me on the below details.

Kind regards,

A handwritten signature in black ink, appearing to be "J. Chomley", written over a light blue horizontal line.

Jack Chomley
Consultant
+61 3 8639 9720
jchomley@urbis.com.au

**ADVERTISED
PLAN**

**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**