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3 June 2026

Department of Transport and Planning

Attention: Michael Juttner | Manager, Energy Assessment

Via Email

Dear Michael,

**Re: Request for amendment to planning permit PLNAPP19/158.01
Wangaratta-Kilfeera Road, Laceby – Laceby Solar Farm**

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This report has been prepared by Habitat on behalf of ANZA Power Pty Ltd (“the applicant”) in support of an application to amend the planning permit PLNAPP19/158.01 (“the permit”) in relation to the use and development of a solar energy facility at Lot 1 TP253930B, addressed as Wangaratta-Kilfeera Road, Laceby. The applicant seeks to amend conditions of the permit.

The permit was approved on 10 September 2020, and construction has not yet commenced.

This application seeks to amend Conditions 33, and 39(c) to 39(i). These conditions relate to the requirement for a speed reduction and road upgrade at the intersection of Snow Road and Wangaratta-Kilfeera Road, and reference the movement of B-doubles on the site.

Full details of the proposed amendments are provided in the following section.

1. Proposed amendment to conditions

It is proposed to amend condition 33 as follows, with deletions in strikethrough:

33. Before the commencement of any works on the subject land (or stages thereof) and before the engagement of any haulage contractors, a Traffic Management Plan (TMP) ~~with reduced speed limit of 80 km/hr in lieu of proposed 60 km/hr at intersection of Wangaratta-Kilfeera Road and Snow Road~~ is required.

It is proposed to amend condition 39 as follows, with deletions in strikethrough:

39. Prior to the commencement of any construction (or stages thereof) on the subject land hereby approved by this planning permit:

- a. Screening (both shade cloth and planting) along the subject land’s property boundary that faces (directly and indirectly) toward the Snow road reserve property boundary and that it shall be no lower than two (2) metres in height.*
- b. The TMP and updated TIAR shall clearly identify where access to the subject land is to be located on Wangaratta-Kilfeera Road.*
- c. ~~For vehicular access to the subject land from Wangaratta-Kilfeera Road: A Functional Layout Plan (FLP) must be submitted and approved by VicRoads. The FLP shall be drawn to scale undertaken by a VicRoads pre-qualified consultant, clearly dimensioned to show (but not limit to) the following:~~*
 - i. ~~The intersection of Snow Road and Wangaratta-Kilfeera Road.~~*
 - ii. ~~A Basic Right (BAR) turn treatment at the intersection of Snow Road and Wangaratta-Kilfeera Road in accordance with Austroads (2017) Guide to Road Design Parts 4 (Figure A28).~~*

- ~~iii. Any proposed kerb and channel as required at the intersection of Snow Road and Wangaratta-Kilfeera Road.~~
- ~~d. The swept path analysis of the following vehicles at 10 km/hr (min) and with 15 metres (min) radii:

 - ~~i. Simultaneous 19 metre semi-trailer trucks 26 metre b-double trucks (one with 0.5 metre clearances on both sides of the vehicle) entering and exiting without overlapping each other or crossing into any opposing lanes; and~~
 - ~~ii. The largest oversized or over mass vehicle as identified in the TMP (without clearances).~~~~
- ~~e. All services, trees, line marking, signs, on-road lighting, other existing accesses and crossovers (on both sides of the arterial road) and other infrastructure (e.g. power poles etc) that are to remain in place or to be relocated or removed.~~
- ~~f. Upon VicRoads' approval of the FLP, a Road Safety Audit must be undertaken at the detailed design stage in accordance with VicRoads' Road Safety Audit Policy.~~
- ~~g. The audit findings and the consultant's responses to the findings must be provided to VicRoads for review and approval.~~
- ~~h. Any mitigating works arising out of the audit must be carried out by the applicant at no cost and to the Roads Corporations' satisfaction.~~
- ~~i. The following roadworks shall be completed to the satisfaction of and at no cost to VicRoads:

 - ~~i. The BAR turn treatment at intersection of Snow Road and WangarattaKilfeera Road;~~
 - ~~ii. Any other works as required by VicRoads within the arterial road reserve.~~~~

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2. Justification

The proposed amendments have been requested for ~~copyright~~ reasons.

Firstly, the original planning permit application was submitted in 2019, and the documentation that supported the application incorporated a traffic impact assessment report (TIAR) that estimated that the construction process of the facility would generate approximately 60 truck movements per day, as well as 400 staff movements.

Since these assumptions were made, the construction model for solar farms – particularly those constructed by the applicant – has significantly changed. It is acknowledged that the estimates for the number of truck and staff movements per day were significantly inflated. Instead of the numbers previously indicated, it is instead more likely that the construction period will attract a maximum of 6 trucks per day, and a maximum of 2 buses and 8 personal vehicles for construction staff. It is noted that the truck movements will be increased to an average of 20 per day during the civil works phase, but all other phases will return to the maximum of 6 per day.

Further, the construction process is no longer proposed to utilise B-double trucks, and instead will utilise semi-trailers as the largest vehicle to the site. This change is owing to the physical size of the equipment required for the solar farm, and noting that no sizeable transformer is proposed that would require a B-double truck for transportation.

As a result of this change, the road upgrade and speed reduction is no longer considered warranted. The reduced traffic volumes, combined with the smaller vehicle sizes, mean that the intersection can accommodate the required turning movements without any road augmentation.

See attached supporting letter from a qualified traffic engineer for further explanation.

Noting the above, the need to provide a functional layout plan and road safety audit is removed. A swept path analysis has been provided in the attached report that shows that simultaneous semi-

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trailer turning movements can occur at the intersection of Snow Road and Wangaratta-Kilfeera Road without any augmentation to the road reserve.

3. Planning assessment impacts

The proposed amendments to conditions do not alter the planning policy context in which the application was approved, nor do they introduce any additional planning policy considerations.

The proposed changes reduce any impacts on surrounding properties, by reducing the amount of vehicle movements, reducing the size of trucks that will be visiting the site.

Further, the change will result in lesser disruption to local commuter, tourist, and resident traffic along Snow Road. In order to undertake the conditioned intersection upgrade, local traffic would have been disrupted throughout a period of road works, which could take several weeks and would result in significant traffic measures such as stoppages and one-way movements, as well as dust and noise generation. In the absence of this requirement, local residents will enjoy the status quo being maintained, and accordingly will experience much less disruption from the construction of the solar farm.

Noting the above, we consider the proposition to amend the condition will offer a net positive outcome on the development context, while maintaining a high standard of amenity for residents, and reducing traffic conflicts during the construction period for the solar farm.

The application is considered to have merit and deserves the support of the Department of Transport and Planning.

Should you have any queries please contact the undersigned directly on 6021 0662 or shannon@habitatplanning.com.au.

S. O'Brien

Shannon O'Brien
Senior Consultant

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