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Planning Permit Application Report

Tragowel Battery Energy Storage System

Loddon Valley Highway, Tragowel, Victoria

For Tragowel BESS Pty Ltd (ACN 688 019 534) as trustee for Tragowel BESS Trust (ABN 31 616 656 334)

23 April 2026

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Document history

Revision	Date	Description	Author	Approved
1	3 November 2025	Draft Planning Report	EK, AP	RW
2	29 January 2026	Updates to Draft Planning Report	AP	RW
3	30 January 2026	Final Planning Report	AP	RW
4	23 April 2026	Section 50 Amendment Updates	AP	RW

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We celebrate the physical and spiritual connections between Indigenous people and place expressed through the Birrarung Wilam (Common Ground) art project on the banks of Melbourne's Yarra River.

Acknowledgement of Country

Cogency acknowledges the Traditional Owners and Custodians of the land on which we meet, work, and write, the Wurundjeri Woi-wurrung peoples of the Kulin nation, and their connections to land, sea, and community. We pay our respects to their Elders past, present, and emerging.

Cogency also extends that respect and acknowledges the Traditional Custodians of Tragowel, the Barapa Barapa, Yorta Yorta and Wamba Wamba people. We recognise and respect their cultural heritage, beliefs and continuing connection with the land and waterways. We also recognise the resilience, strength, and pride of the Barapa Barapa, Yorta Yorta and Wamba Wamba people and acknowledge that Sovereignty was never ceded.

Executive Summary

Green Switch Australia Pty Ltd (Green Switch) and Potentia Energy Pty Ltd (Potentia) have engaged Cogency Australia Pty Ltd (Cogency), a planning and engagement firm, to prepare the enclosed planning permit application package for Tragowel BESS Pty Ltd (ACN 688 019 534) as trustee for Tragowel BESS Trust (ABN 31 616 656 335) (the Proponent) to be lodged with the Minister for Planning (the Responsible Authority) for permit approval.

This planning report supports an application for the use and development of land for a 'Utility installation' (land used to transmit, distribute, or store power), known as the Tragowel battery energy storage system (BESS) (the Proposal), located in Tragowel, Victoria. The Tragowel BESS will have an operational capacity of up to 200MW / 800MWh at the point of connection.

The Proposal is predominantly located at Loddon Valley Highway, Tragowel. It is comprised of two areas:

- BESS Development Area is the land within the Project Site where the BESS, access points, and where the carriageway interacts with the Loddon Valley Highway, associated infrastructure, and landscape planting are located.
- Transmission Development Area, being the land used for the transmission cable and easement, running from the north-east corner of the BESS Development Area into the Kerang Terminal Station.

These Development Areas are together referred to as the 'Project Site' (Figure 1).

The land within the Project Site that will be developed on is approximately 15 Ha. This is comprised of a 7 Ha area for the BESS (within a 12.3 Ha landholding) and approximately 8 Ha for the Transmission Development Area for the transmission line connection to the Kerang Terminal Station.

Primary access to the BESS Development Area will be provided from a new access point on Loddon Valley Highway. Secondary access will also be provided south of the main access point. The Proposal will connect to Victoria's high-voltage electricity transmission network via a 220kV underground transmission line to AusNet's Kerang Terminal Station. The Proposal will not form part of the Victoria to New South Wales Interconnector West (VNI West); however, it will help support electricity generation in the region.

The purpose of this planning permit application package is to provide the Responsible Authority and referral authorities with comprehensive details of the Proposal. This includes details on the Proponent and project team, design features, potential impacts and mitigations, and compliance with relevant Acts, regulations, plans, land use controls, and guidelines, contained primarily within the Gannawarra Planning Scheme (Planning Scheme).

The Proposal is considered for the use of 'Utility installation' and is classed as a Section 2 (permit required) use within the Farming Zone (FZ). Part of the Transmission Development Area is also within the Transport Zone 2 (Principal Road Network) (TRZ2). This is to the extent that the underground transmission line crosses the Loddon Valley Highway to connect to the Kerang Terminal Station. The Proposal and planning permit triggers are summarised in Table 1.

The Proposal requires ancillary infrastructure (including a substation and associated electrical infrastructure and a transmission connection to the existing Kerang Terminal Station), and ancillary works, such as new access points and internal tracks, native vegetation removal, security fencing, drainage, earthworks, and landscaping.

The Project Site is ideally suited to a BESS and associated infrastructure development, due to the proximity to existing electrical infrastructure, relatively flat topography, minimal existing vegetation, and distance to nearby dwellings.

Based on the technical work completed to date, the Proposal is not anticipated to result in significant environmental or community impacts. Instead, it will contribute to Victoria's energy storage targets, provide essential grid stability services, and deliver economic benefits to the local region. By providing more reliable and affordable energy, it aligns with a number of State, Regional, and Local policies of the Gannawarra

Planning Scheme, including energy generation, minimising impacts to native vegetation, and providing new infrastructure. As a result, it is considered that the application complies with the Gannawarra Planning Scheme, and a permit should be issued.

Table 1 – Application summary

Application Summary	
Municipality	Gannawarra Shire Council
BESS Development Area	
Address	Loddon Valley Highway, Tragowel 3579
Title Description	Crown Allotment 3(PT) Parish of Kerang, Lot 1 on Title Plan 601295P Loddon Valley Highway Road Reserve
Development Footprint	7 Ha
Restrictions on Title	None
Transmission Development Area	
Address	Loddon Valley Highway, Kerang 3579 4121 Loddon Valley Highway, Kerang 3579
Title Description	1/PS319844S (Kerang Solar Plant) 2/PS319844S (Kerang Solar Plant) TP337631V (Kerang Terminal Station) Loddon Valley Highway Road Reserve
Development Footprint	7 Ha, comprising a 2.5km long, 20-30m transmission corridor easement
Restrictions on Title	TP337631V – Appurtenant easement (dated 2013) PS319844S – Caveat AX681454K (29/01/2024, Kerang Solar Plant)
Planning	
Planning Scheme	Gannawarra Planning Scheme
Responsible Authority	Minister for Planning
Zones	35.07 - Farming Zone (FZ) 36.04 – Transport Zone – Principal road network (TRZ2)
Overlays	- Environmental Significance Overlay (ESO2 and ESO4) - Clause 42.01 - Specific Controls Overlay (SCO2) - Clause 45.12
Other Planning Considerations	Bushfire Prone Area (entire site)
Relevant Particular Provisions	52.05 Signs 52.06 Car Parking 52.17 Native Vegetation 52.29 Land Adjacent to the Principal Road Network 53.22 Significant Economic Development
Permit triggers	35.07-1 – Section 2 Use of land for a Utility installation 35.07-4 – To construct a building or works associated with a use in Section 2 of Clause 35.07-1 35.07-4 (Schedule) – A building which is within the minimum setback (100m) from a road in the Transport Zone 2 35.07-4 (Schedule) – Earthworks which change the rate of flow or the discharge point of water across a property boundary, or which increase the discharge of saline groundwater 36.04-1 – Section 2 Use of land for a Utility installation 36.04-2 – To construct a building or construct or carry out works for a Section 2 use 42.01-1 - To construct a building or construct or carry out works 42.01-2 – Remove, destroy, or lop any vegetation 52.05-14 – Development of a business identification sign 52.06-6 – To provide car parking spaces to the satisfaction of the responsible authority

	52.17-1 – Removal of native vegetation 52.29-2 – Land adjacent to the Principal Road Network (to create or alter access to a road in a Transport Zone 2)
Permit exemptions	N/A
Notice and review	53.22-4 – Application is exempt from the decision requirements of section 64(1), (2) and (3) and the review rights of section 82(1) of the <i>Planning and Environment Act 1987</i> .
Referral requirements	66.02-2 – Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the Conservation, Forests and Lands Act 1987) 66.02-4 – Electricity transmission authority 66.02-7 – Victorian WorkCover Authority 66.03 – Head, Transport for Victoria 66.04 – Secretary to the Department administering the Minerals Resources (Sustainable Development) Act 1990

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Appendix I	Risk Management Plan (including Fire Safety Study)
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Glossary

Abbreviation	Meaning
ABS	Australian Bureau of Statistics
AEMO	Australian Energy Market Operator
AHD	Australian Height Datum
BBAC	Barapa Barapa Aboriginal Corporation
BESS	Battery Energy Storage System
CFA	Country Fire Association
CDIS	Community Drop-In Session
CHMP	Cultural Heritage Management Plan
CMA	Catchment Management Authority
DDWCAC	Dja Dja Wurrung Clans Aboriginal Corporation
DEECA	Department of Energy, Environment and Climate Action
DTP	Department of Transport and Planning
EPA	Environmental Protection Authority
EPBC	Environment Protection and Biodiversity Conservation
ESO	Environmental Significance Overlay
FPSR	First Peoples State Relations
FZ	Farming Zone
HDD	Horizontal direct drilling
HTV	Head, Transport for Victoria
LFP	Lithium Ferro(iron) Phosphate
LGA	Local Government Area
kV	Kilovolt
MNES	Matters of National Environmental Significance
MPS	Municipal Planning Strategy
MW	Megawatt
MWh	Megawatt-hour
NEM	National Energy Market
NWREZ	North West Renewable Energy Zone
O&M	Operations and Management
PPF	Planning Policy Framework
RAP	Registered Aboriginal Party
REZ	Renewable Energy Zone
SCO	Specific Controls Overlay
TRZ2	Transport Zone 2 – Principal Road Network
VNI West	Victoria to New South Wales Interconnector West
VRET	Victorian Renewable Energy Target
VTP	Victorian Transmission Plan
WAC	Wiran Aboriginal Corporation
WWAC	Wamba Wemba Aboriginal Corporation
YYNAC	Yorta Yorta Nation Aboriginal Corporation

1. Introduction

Cogency Australia Pty Ltd (Cogency), on behalf of Tragowel BESS Pty Ltd (ACN 688 019 534) as trustee for Tragowel BESS Trust (ABN 31 616 656 334) (the Proponent), has prepared this report to accompany a planning permit application for a utility-scale Battery Energy Storage System (BESS) and ancillary infrastructure predominantly located at Loddon Valley Highway, Tragowel, hereby referred to as the Tragowel BESS (the Proposal). The Proponent and their experience are described in the section 1.3 of this report.

The Proposal is considered to have strong alignment with the stated purposes of the applicable zones and overlays, as well as key state, regional, and local policies within the Gannawarra Planning Scheme (the Planning Scheme). It also implements a range of Federal and Victorian policy objectives in relation to renewable energy, storage, and emissions reduction.

This report outlines the Proposal, details the site and locality, and provides a detailed planning assessment of the Proposal against the Planning Scheme and relevant policy.

1.1 Proposal Summary

The Proponent is seeking to use and develop an area of surplus agricultural grazing land in Tragowel for the purposes of a BESS.

The Proposal is located at Loddon Valley Highway, Tragowel (no street address), identified as Crown Allotment 3(PT) Parish of Kerang, Lot 1 on Title Plan 601295P. Tragowel is situated at the southern extent of the Gannawarra Shire Council Local Government Area, a part of the Loddon Mallee Region. The BESS Development Area comprises part of an approximately 23 Ha landholding, split into four paddocks. The BESS will be located on the northernmost paddock, which is approximately 12.3 Ha.

The proposed Tragowel BESS will involve the construction, operation, and decommissioning of a utility-scale BESS with an operational capacity of up to 200MW/800MWh at the point of connection. The development footprint within the Project Site will be approximately 15 Ha, incorporating 7 Ha for the BESS Development Area and 8 Ha for the Transmission Development Area.

The transmission line will be underground, extending from the north-east corner of the BESS Development Area to the Kerang Terminal Station. It will run north over private land that hosts the Kerang Solar Plant towards Old Echuca Road. It will then turn west and run underneath Loddon Valley Highway and north across Old Echuca Road, before turning west again to connect to the Kerang Terminal Station. The Transmission Development Area will be approximately 2.5 km in length and will vary in width in certain locations between 20-30m.

This Proposal is not associated with the Victoria to New South Wales Interconnector West (VNI West). The Proposal will, however, support electricity generation in the region.

Figure 1 below depicts the Project Site and boundaries.

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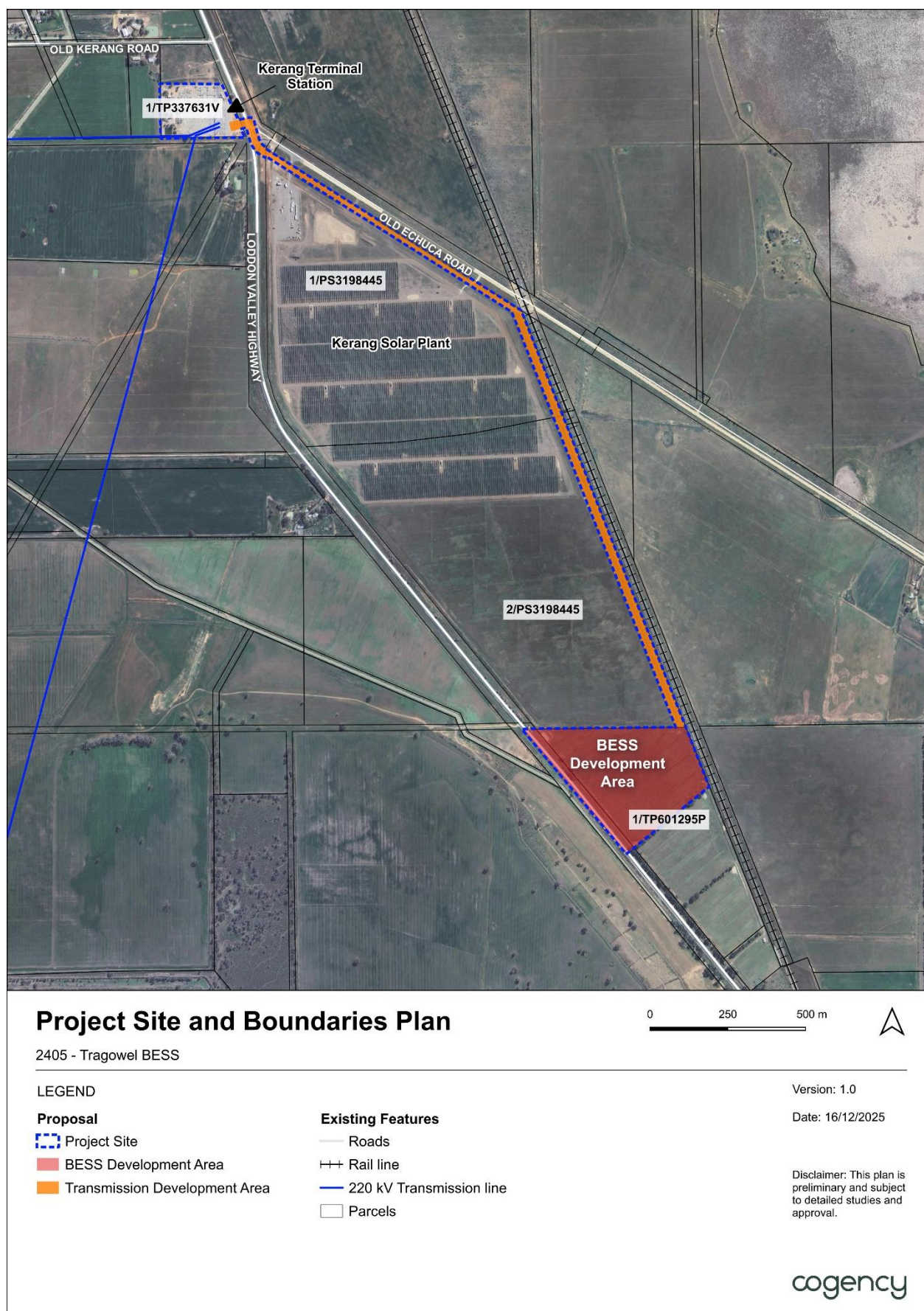


Figure 1 – Project Site and Boundaries Plan

The Proposal will include:

- BESS compounds
- Switching station and associated electrical infrastructure.
- Underground transmission connection to the existing 220/66/22kV Kerang Terminal Station
- Auxiliary power supplies
- Protection and control equipment
- Site office
- Operations and maintenance building
- Access points and internal tracks
- Water storage systems and fire-fighting infrastructure
- Security fencing and monitoring
- Earthworks/benching
- Stormwater detention basins
- Landscaping/screening

Refer to Figure 2 and Figure 3 for the concept layout of the Proposal.

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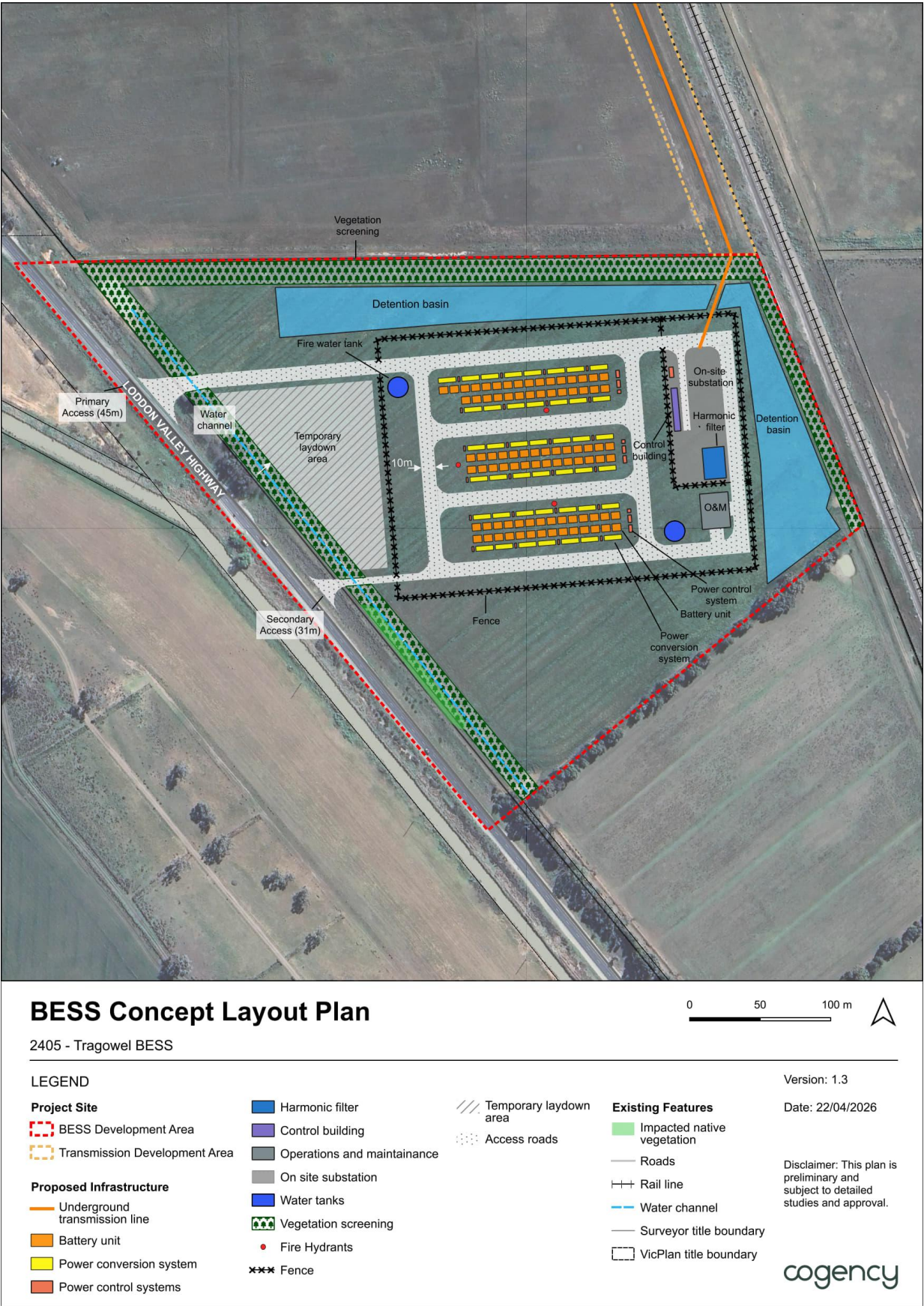


Figure 2 – Tragowel BESS Concept Layout

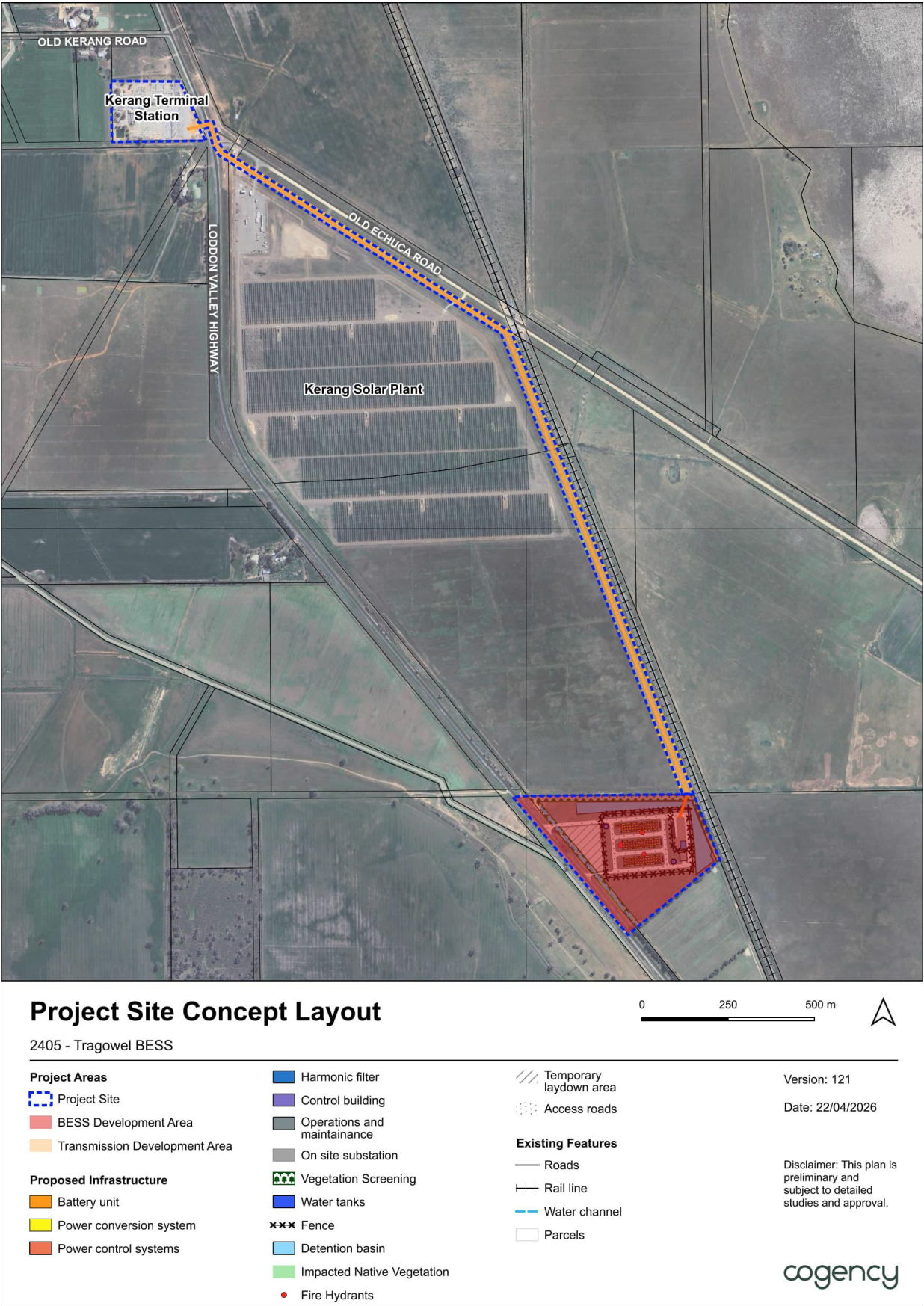


Figure 3 – Project Site Concept Layout

Once operational, the Tragowel BESS will provide critical support for existing and proposed renewable energy projects in the Loddon Mallee region and the North West Renewable Energy Zone (NWREZ).

Planning permit triggers

The Project Site is located in the Farming Zone (FZ) and is within the Environmental Significance Overlay – Schedule 4 (ESO4) and Specific Controls Overlay 2 (SCO2). Part of the Transmission Development Area runs across the Loddon Valley Highway, which is located in the Transport Zone 2 – Principal road network (TRZ2). Part of the Transmission Development Area that crosses the Loddon Valley Highway is also within the Environmental Significance Overlay – Schedule 2 (ESO2). Refer to section 6.4 for more details.

The planning permit triggers are:

- **Clause 35.07-1** – Use of land for a utility installation
- **Clause 35.07-4** – Buildings and works associated with a Section 2 Use
- **Clause 35.07-4 (Schedule)** – A building which is within the minimum setback (100m) from a road in the Transport Zone 2
- **Clause 35.07-4 (Schedule)** – Earthworks which change the rate of flow or the discharge point of water across a property boundary, or which increase the discharge of saline groundwater
- **Clause 36.04-1** – Use of land for a Utility installation
- **Clause 36.04-2** – Construct a building or construct or carry out works for a Section 2 Use
- **Clause 42.01-2** – Buildings and works
- **Clause 52.05-14** – Development of a business identification sign
- **Clause 52.17-1** – Removal of native vegetation
- **Clause 52.29-2** – Land adjacent to the Principal Road Network (to create or alter access to a road in a Transport Zone 2 (TRZ2))

In addition, car parking must be provided to the satisfaction of the Responsible Authority in accordance with **Clause 52.06-6**.

Engagement

The Proponent has undertaken a comprehensive community and stakeholder engagement program, appropriately informing nearby residents and the wider community of the Project. Consistent and clear information has been provided to stakeholders and the community, outlining the details of the Proposal and any potential impacts. Future ongoing engagement will continue post-lodgement. The project team has engaged with Department of Transport and Planning (DTP), and other key stakeholders, including the Gannawarra Shire Council, First Peoples State Relations (FPSR), First Nations groups, Country Fire Authority (CFA), North Central Catchment Management Authority (CMA), local businesses, and community members. Engagement activities have included stakeholder briefings, near neighbour mailouts and direct letter drops, a community drop-in session, fact sheets, and newspaper advertisements. The Proponent will continue to engage with these stakeholders during the post-lodgement phase.

Feedback received on the proposal so far has been generally positive, with constructive suggestions for improvement. Stakeholders and community members support the Proposal but have expressed concerns about consultation fatigue and limited communication from other renewable energy projects in the region. While participants acknowledged the potential economic and employment benefits of major infrastructure, they stressed the importance of transparent engagement and meaningful benefit-sharing.

Key themes raised during the engagement thus far include flood and fire management strategies and opportunities for early planting of vegetation for screening. Overall, the feedback indicates no strong opposition to BESS projects, and there is minimal concern regarding visual impacts or transmission line design at this stage.

Refer to section 4 for more details regarding community and stakeholder engagement undertaken as part of this Proposal.

Strategic benefit

The strategic advantages of the location and Project Site include:

- Proximity to existing high voltage electrical infrastructure and the national grid at the Kerang Terminal Station
- Proximity to existing and proposed renewable energy infrastructure, including the operational Kerang Solar Plant
- Relatively flat topography
- Separation distance to nearby dwellings and sensitive receptors
- Lack of vegetation on the Project Site

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The Tragowel BESS will provide a number of substantial benefits, including:

- Making use of land adjacent to existing electrical infrastructure
- Providing energy storage to support renewable energy generation and system reliability
- Economic opportunities for local contractors during construction and operation
- Benefit-sharing framework to support the local community

Please refer to Appendix M – Engagement Summary Report for more details on how the Proposal will seek to provide benefits to the local community and region.

Project team

In addition to Cogency, suitably qualified specialist consultants have been engaged to assess and provide input into the Proposal. Table 2 lists the specialist environmental and technical consultants who have contributed to the design iterations and assessment of the Proposal. A range of impact assessments have been prepared to accompany this application (included as appendices) and should be read in conjunction with this Planning Report.

Table 2 – Consultants

Proposal consultant	Technical expertise	Assessment (refer to Appendices)
Peter Haack Consultancy	Landscape and visual impact	Landscape and Visual Impact Assessment
SLR Consulting Pty Ltd	Noise	Noise Impact Assessment
Dalton Consulting Engineers	Hydrology	Hydrology Impact Assessment Stormwater Management Strategy
EcoLink Consulting Pty Ltd	Ecology	Biodiversity Assessment
GML Heritage Victoria Pty Ltd	Aboriginal Cultural Heritage	Cultural Heritage Due Diligence and Cultural Heritage Management Plan (CHMP)
onemilegrid	Transport	Transport Impact Assessment
Fire Risk Consultants	Bushfire risk	Risk Management Plan (including Fire Safety Study)
Ag-Challenge	Agriculture	Agricultural Assessment

Based on technical impact assessments, the Proposal is not expected to generate any unreasonable or significant environmental or community impacts.

1.2 Traditional Owners

Prior to European Settlement, Gannawarra Shire was stewarded by the Wamba Wamba, Barapa Barapa and Yorta Yorta people. There is no formally Registered Aboriginal Party (RAP) in Tragowel. Nearby RAPs are the Wamba Wamba Aboriginal Corporation (WWAC) and the Yorta Yorta Nation Aboriginal Corporation (YYNAC).

Other First Nations groups with connection to the area are the Barapa Barapa Aboriginal Corporation (BBAC), Wiran Aboriginal Corporation (WAC), and the Dja Dja Wurrung Clans Aboriginal Corporation (DDWCAC).

Engagement with First Nations is being facilitated through the appointed Cultural Heritage Consultant, GML. Since there is no RAP for the Project Area, engagement has primarily been with FPSR regarding Aboriginal cultural heritage and the CHMP process. Several First Nation groups interested in the Project Area, including BCAC, WWAC, and Wiran Aboriginal WAC, have been contacted, despite the lack of an RAP.

For a detailed summary of engagement with FPSR and First Nations, refer to section 4.3.2.3.

1.3 The Proponent

The Proponent is Tragowel BESS Pty Ltd as trustee for Tragowel BESS Trust, which is a company established by Potentia Energy, the. On behalf of the Proponent, the development of the Proposal is being managed by Potentia Energy with the support of Green Switch Australia, two experienced renewable energy and storage project developers.

1.3.1 Potentia Energy

Potentia Energy is a leading Australian renewable energy developer and asset owner, dedicated to supporting the nation's transition to clean energy. With a growing portfolio of utility-scale wind, solar, and battery storage projects, including local projects Cohuna Solar Farm and Girgarre Solar Farm. Potentia Energy is a recently formed company and jointly owned by Enel Green Power and INPEX, two global leaders in the renewable energy sector with a diverse portfolio of renewable energy projects. With an established Australian team with full project lifecycle management capabilities, Potentia Energy is aiming for a \$4 billion investment in the Australian renewable market between 2024-2028.

Potentia Energy is committed to innovation, sustainability, and championing environmental stewardship, positioning them at the forefront of the renewable energy transition. It is committed to working respectfully and collaboratively with communities, landholders, and Traditional Owners throughout every stage of project development. Its approach to community engagement is guided by the "Creating Shared Value" philosophy, which recognises that sustainable business success is intrinsically linked to delivering positive economic and social outcomes for local communities.

In partnering with Green Switch on the Tragowel BESS, Potentia Energy brings international expertise in managing renewable energy project lifecycles, a commitment to community and First Nations engagement, as well as demonstrated innovation and sustainability of project implementations. Currently, Potentia Energy owns and operates the 34 MW Cohuna Solar Farm, located 25 km east of the Project Site. Potentia Energy has a proven track record of community benefit sharing and consistent engagement with key stakeholders.

1.3.2 Green Switch Australia

Green Switch Australia (Green Switch) is a developer of utility-scale solar and storage projects, overseeing several solar farms in NSW, VIC, and ACT. The Green Switch team has been operating internationally in the renewable energy sector for over 20 years, with proven success in developing, building, owning, and operating their renewable energy projects. The leadership of Green Switch has delivered over 2.0 GW of solar renewables since 2015.

Green Switch is looking to diversify its operations further into the BESS realm, and the Tragowel BESS, located amongst a cluster of current and developing renewable energy projects in proximity to the Kerang Terminal

Station, will be its largest BESS project to date. Green Switch champions long-lasting community relations with a strong focus on landowner relationships.

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2. Site Context and Analysis

The following section provides an overview of the site context and an analysis of the site conditions for the Proposal.

The Proposal is made up of the following two areas:

- BESS Development Area, being the land proposed to be occupied by the BESS, access points and where the carriageway interacts with the Loddon Valley Highway, associated infrastructure, and landscape planting.
- Transmission Development Area being the land set aside for the transmission line and easement, comprising an Ha area of private and public land (Loddon Valley Highway road reserve), running from the BESS Development Area to the Kerang Terminal Station.

Together, these two Development Areas form part of the 'Project Site.' Additionally, it encompasses the Kerang Terminal Station and small sections of the Loddon Valley Highway Road Reserve, which will be used to facilitate the construction of the underground transmission connection.

The Project Site includes all land designated for the proposed use and development. This includes private land associated with the BESS Development Area and the Transmission Development Area.

Please refer to Figure 1 above.

2.1 Site Context

2.1.1 Overview

The Project Site is located on rural agricultural land and on land in Tragowel. Tragowel is in the Gannawarra Shire Council Local Government Area (LGA) and is part of the broader Loddon Mallee Region of north-western Victoria. The site is located approximately 7km south of Kerang and 60km south-east of Swan Hill. Tragowel has a population of only 83 residents (ABS, 2021). Kerang, the next closest town to the Project Site, has a population of 3960 (ABS, 2021).

The Proposal is predominately located on Loddon Valley Highway, a road that runs north-west from Bendigo to Kerang and connects to the Murray Valley Highway to the north of the Project Site. The surrounding area includes rural and agricultural properties, the Tragowel Swamp Nature Conservation Reserve to the south-east, Kerang Airport to the north-west, and the Swan Hill railway line to the east.

The 220kV/66kV/22kV Kerang Terminal Station, located to the north-west of the BESS Development Area, and within the Transmission Development Area, is owned and operated by AusNet Transmission Group (AusNet).

Figure 4 below depicts the broader context surrounding the Project Site.

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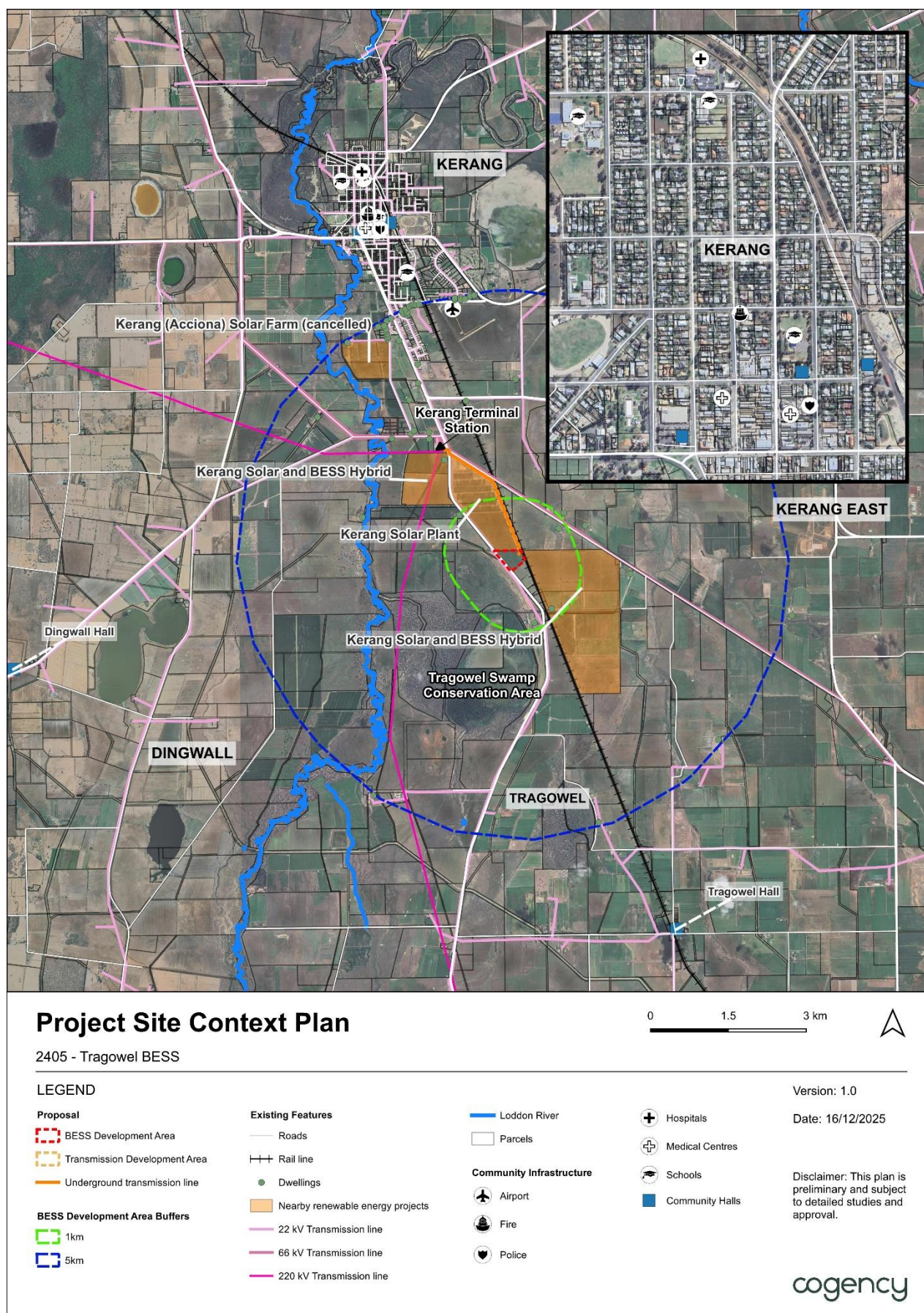


Figure 4 – Project Site Context Plan

2.1.2 North West Renewable Energy Zone

The Project Site is located within the proposed North West Renewable Energy Zone (REZ) (Figure 5). The North West REZ is one of six proposed REZs under the 2025 Victorian Transmission Plan (VTP) (Figure 6). The North West REZ (Figure 7) is located between Kerang and Swan Hill and is comprised of parts of the Swan Hill, Gannawarra, Loddon and Buloke local government areas.

The development of REZs across the state is a key initiative in Victoria's energy transformation. REZs are areas which have been identified as optimal locations to host abundant renewable energy resources, such as solar, wind and battery infrastructure, the full development of which can ensure the timely and cost-effective delivery of secure and clean energy for Victoria.

VicGrid is the responsible entity for planning and delivering the North West REZ.

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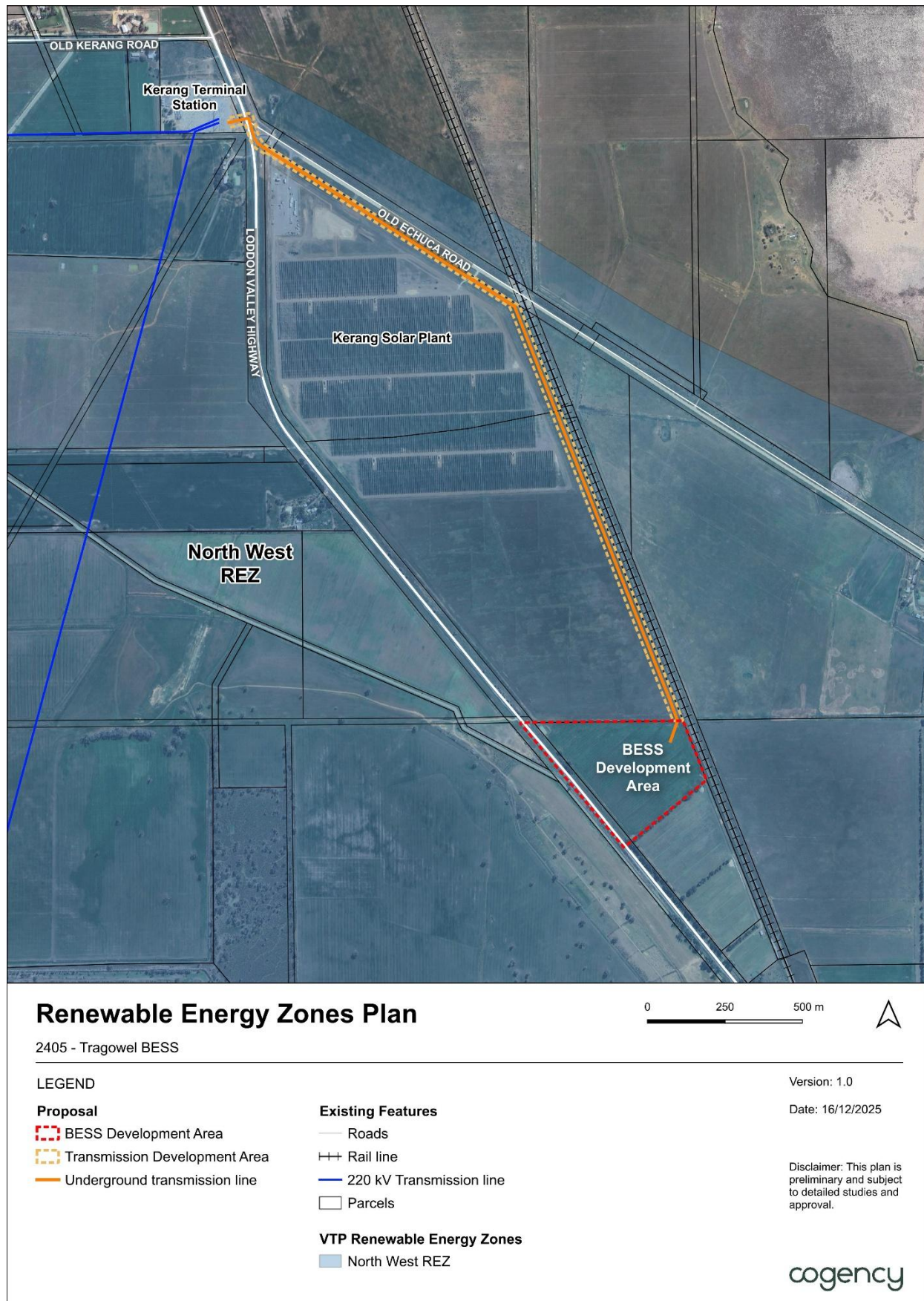


Figure 5 - Renewable Energy Zones Context

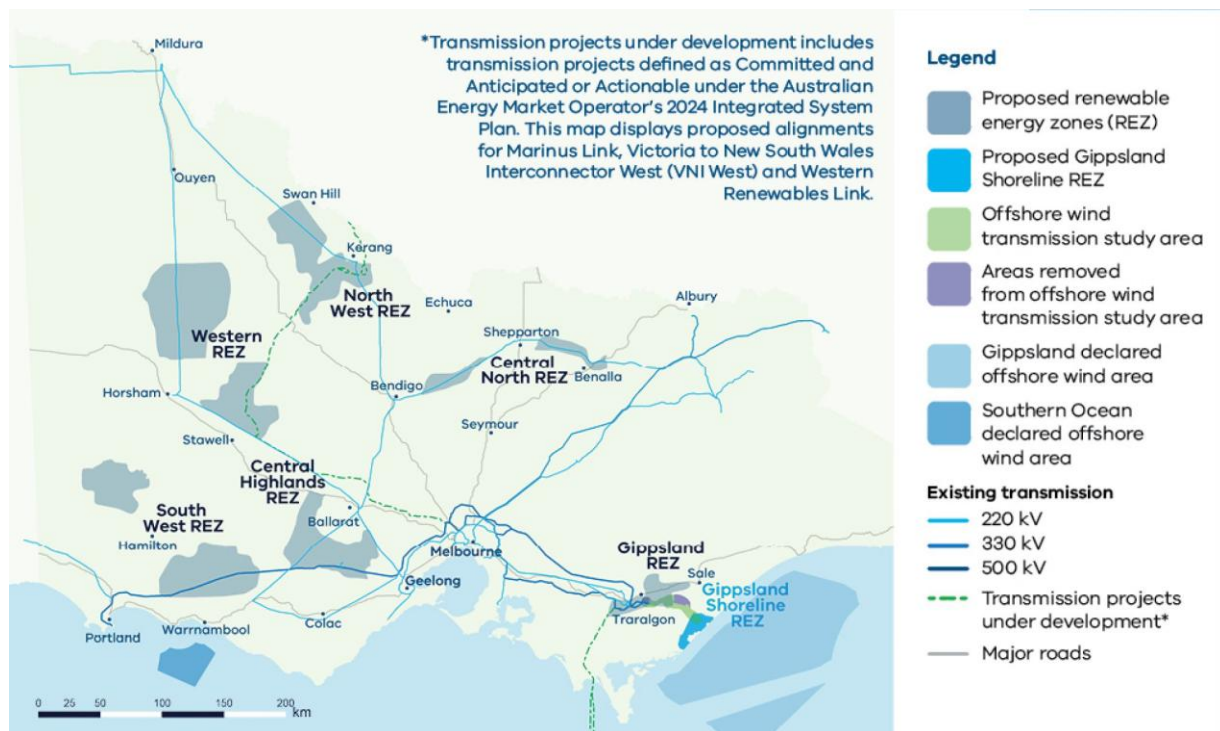


Figure 6 – Victoria Renewable Energy Zones Map (Source: VicGrid)

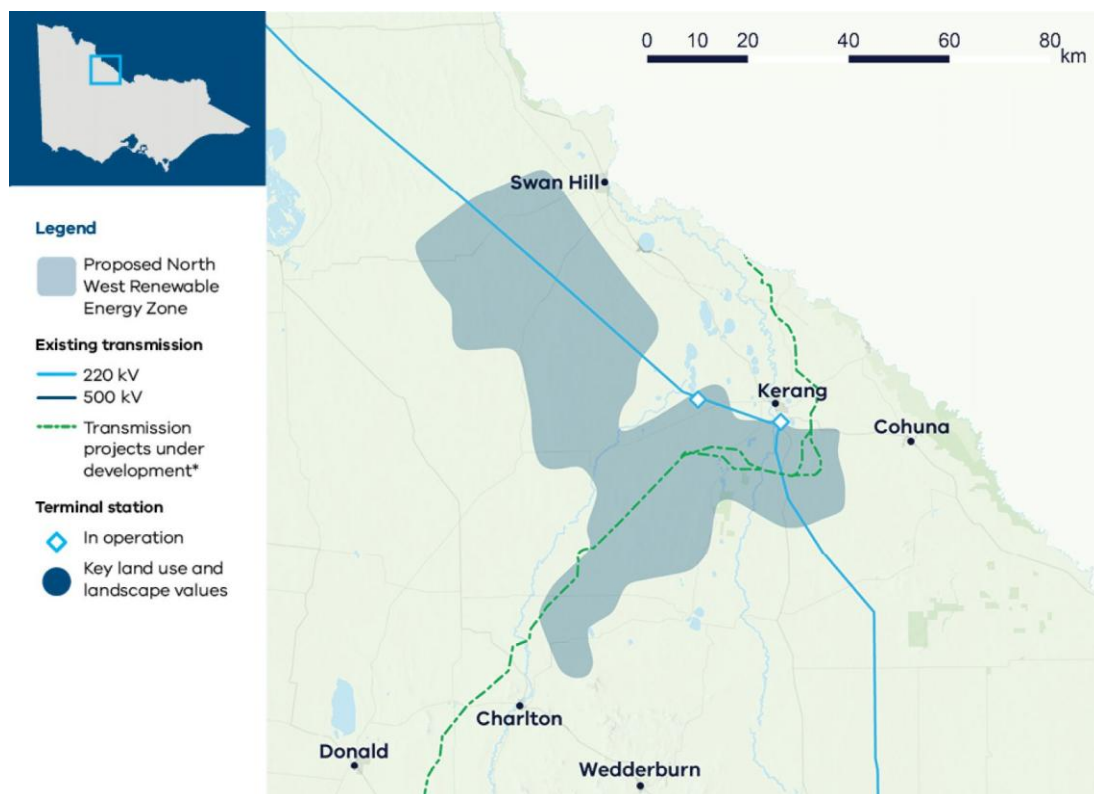


Figure 7 - North West REZ (Source: VicGrid)

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2.2 Site Analysis

The following sub-sections provide an overview of the topographical features, infrastructure and land uses applicable to the Project Site and surrounds.

Certificates of Title for the Project Site are provided at Appendix A.

2.2.1 Overview

The Proposal is located at Loddon Valley Highway, Tragowel. The BESS Development Area is part of a larger 23 Ha agricultural land holding that has been split into four separate paddocks. The Proposal will utilise the largest and northernmost of the paddocks, being a 12.3 Ha landholding.

The BESS Development Area is primarily used for animal grazing and growing fodder crops. In the north-west corner of the BESS Development Area, there is a small farming dam and an informal irrigation channel constructed by the landowner. The land is flat, with few trees, resulting in clear views of the site from the Loddon Valley Highway and the BESS Development Area.

The Transmission Development Area includes private land (including the land that hosts the Kerang Solar Plant), the Loddon Valley Highway, and the Kerang Terminal Station. The Transmission Development Area will be approximately 2.5km in length and between 20-30m in width, with the transmission cable being underground. The existing 220kV transmission line, managed by AusNet, runs north-east and south-east of the Proposal.

The Project Site was selected due to its proximity to several solar farm projects in various stages of development and the Kerang Terminal Station (refer to Section 2.2.8 and Figure 12). The closest dwelling is located approximately 860m east of the BESS Development Area and has therefore been considered in relation to potential noise, visual amenity, and community sentiment concerns. However, the BESS Development Area benefits from the existing vegetation along its southern boundary and is advantageously located south of Kerang Solar Plant, effectively screening the BESS from dwellings to the north and south.

Table 3 – Project Site photographs



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2.2.2 Easements and caveats

The easements and caveats that apply to the Project Site are summarised in Table 4.

Table 4 – Easements and caveats

Property Address	Parcel	Easement	Caveat	Relevance to Proposal
Loddon Valley Highway, Tragowel (BESS Development Area)	TP601295P	N/A – no easements	N/A – no caveats	N/A
44 Old Echuca Road, Kerang (Transmission Development Area – Kerang Solar Plant)	1/PS319844 2/PS319844	N/A – no easements. Note – easement removed in 2016	Caveat AX681454K (29/01/2024, Kerang Solar Plant)	The Proponent has a right to obtain an easement over PS319844S as part of the Transmission Development Area (see section 2.2.2 below)
Loddon Valley Highway – Road Reserve (Transmission Development Area)	N/A	N/A	N/A	The underground transmission line intersects with the highway, with works proposed in the road reserve. Work proposed in TRZ2 – Principal Road network, with consent to lodge

Property Address	Parcel	Easement	Caveat	Relevance to Proposal
				received from Head, Transport of Victoria.
4121 Loddon Valley Highway, Kerang (Transmission Development Area – Kerang Terminal Station)	TP337631V	Appurtenant easement (dated 2013)	N/A – no caveats	Influences the transmission line route and the bay to connect into

2.2.3 Site Tenure

The Proponent will lease the BESS Development Area from the current landowner. The lease will be for a period of 23 years, with the option to extend by a further 20 years. At the end of the lease period and as a condition of the lease, the Proponent is required to remove the BESS and associated project infrastructure and restore the land to its pre-lease condition (that is, farmland).

The land on which the Transmission Development Area is located is, in part, owned by Green Switch Australia No 21, a company related to Green Switch. Green Switch Australia No 21 owns the land that hosts the Kerang Solar Plant (which is currently subject to a lease). The Proponent has a right to obtain an easement over the land forming the transmission line route in the Transmission Development Area.

2.2.4 Existing Access

Existing access to the Project Site is currently made via a concealed crossover from the Loddon Valley Highway, approximately 500 m south of the Project Site, with an unsealed intra-site access track that runs between the four paddocks, which includes the BESS Development Area. The intra-site access track leads to the southeastern corner of the Project Site.

Loddon Valley Highway forms part of the Principal Road Network and runs north-south between Murray Valley Highway in Kerang to Calder Highway in Ironbark (Bendigo). Loddon Valley Highway is single traffic lane in both directions.

2.2.5 Planning zones, overlays, and other planning considerations

The Proposal is subject to a number of zones and overlays under the Gannawarra Planning Scheme.

The Project Site is located within the Farming Zone (FZ). Part of the Transmission Development Area is in the Transport Zone 2 – Principal Road Network (TRZ2), where the transmission cable crosses under the Loddon Valley Highway to connect into the Kerang Terminal Station.

An Environmental Significance Overlay – Schedule 4 (ESO4) and a Specific Controls Overlay – Schedule 2 (SCO2) apply to the Project Site. The SCO2 does not apply to the Proposal. An Environmental Significance Overlay – Schedule 2 (ESO2) also applies to the Transmission Development Area, where the transmission cable crosses the Loddon Valley Highway.

Other key planning considerations include Bushfire Prone Areas (mapped across the Project Site) and areas of Aboriginal Cultural Heritage Sensitivity (adjacent to the proposed BESS Development Area and the Loddon Valley Highway). Figure 8 to Figure 11 provides map overviews of the applicable zones and overlays.

Section 6 provides a more detailed planning assessment with respect to the zone and overlay controls.

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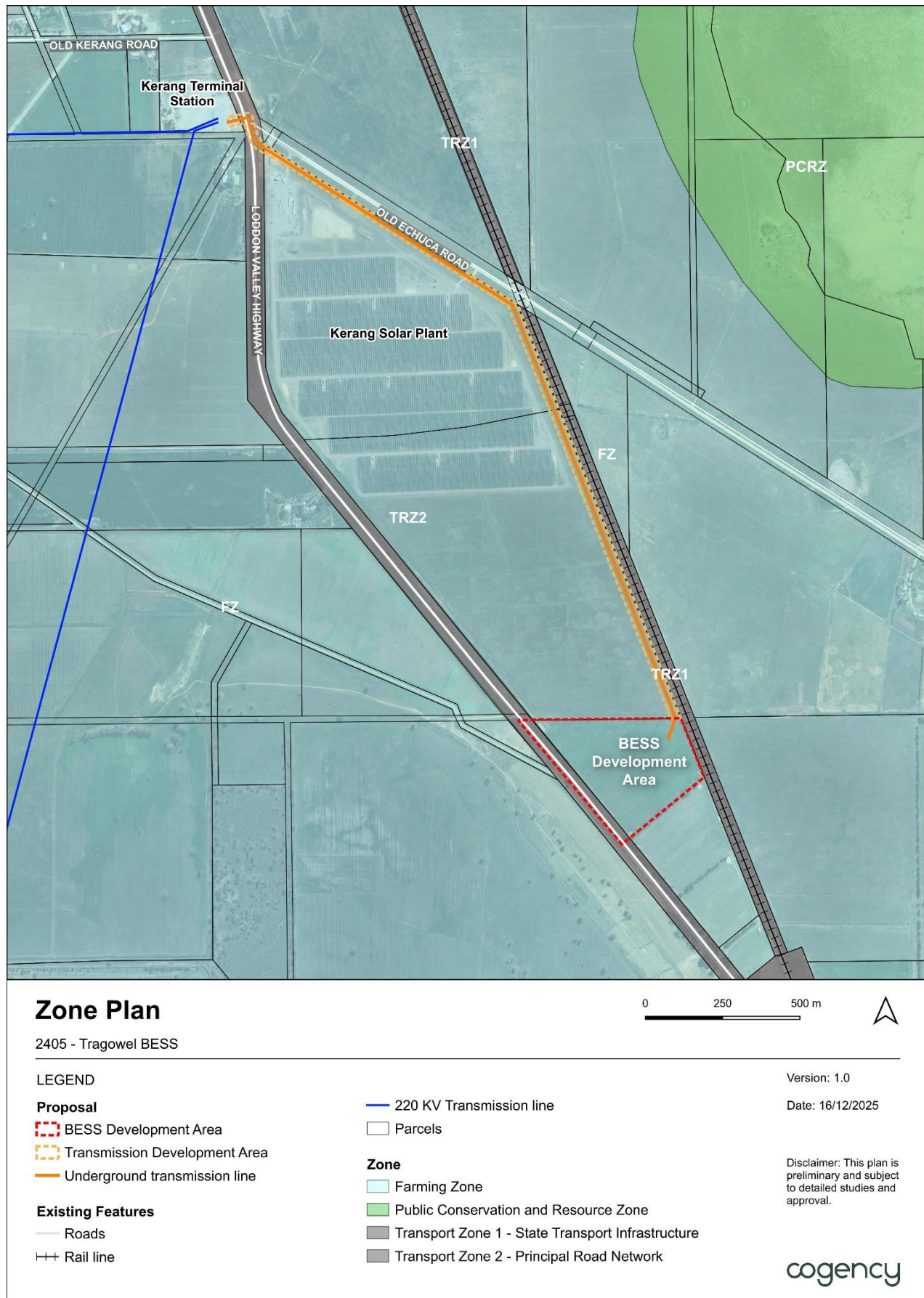


Figure 8 - Zone Map

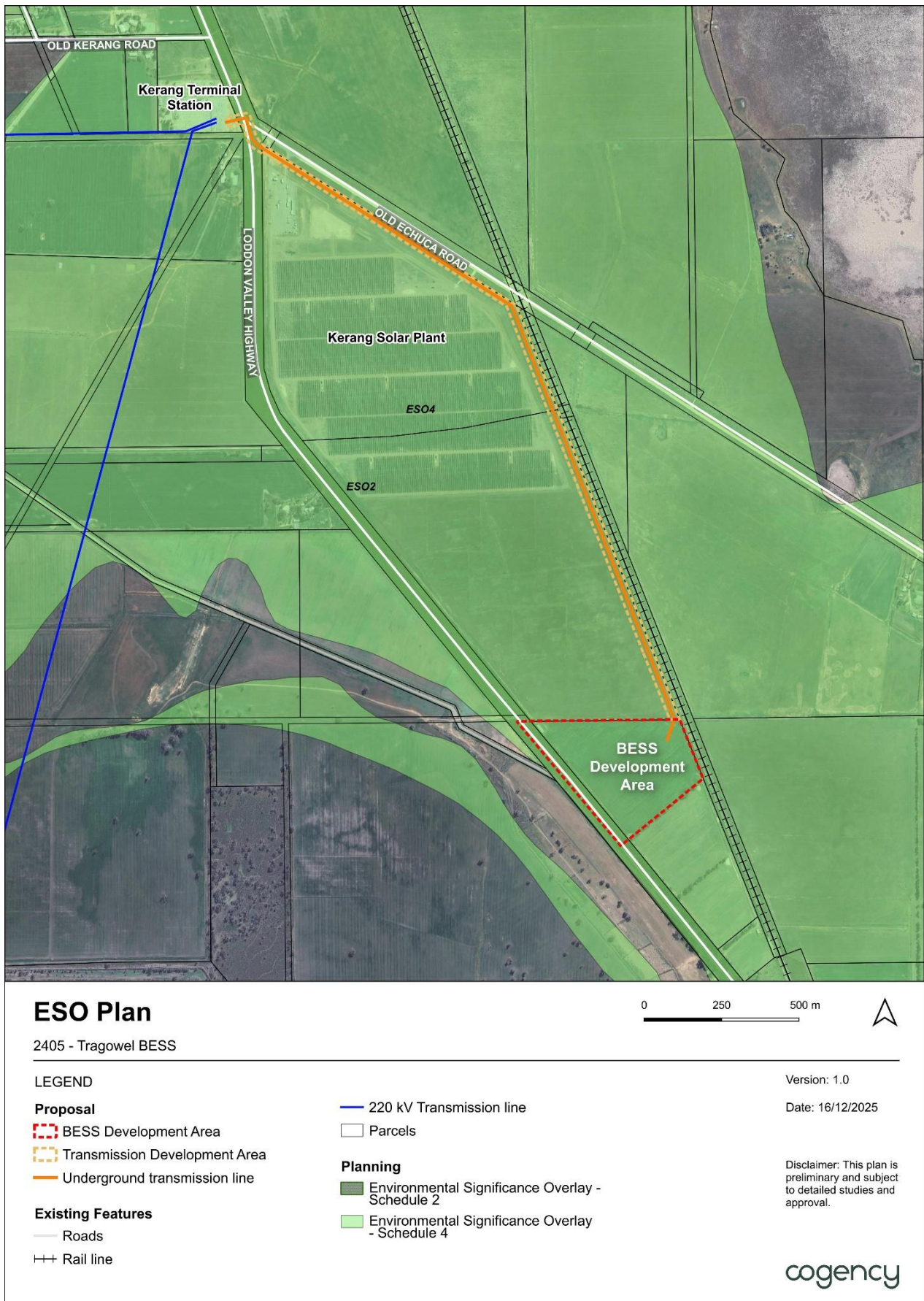


Figure 9 - Environmental Significant Overlay Map

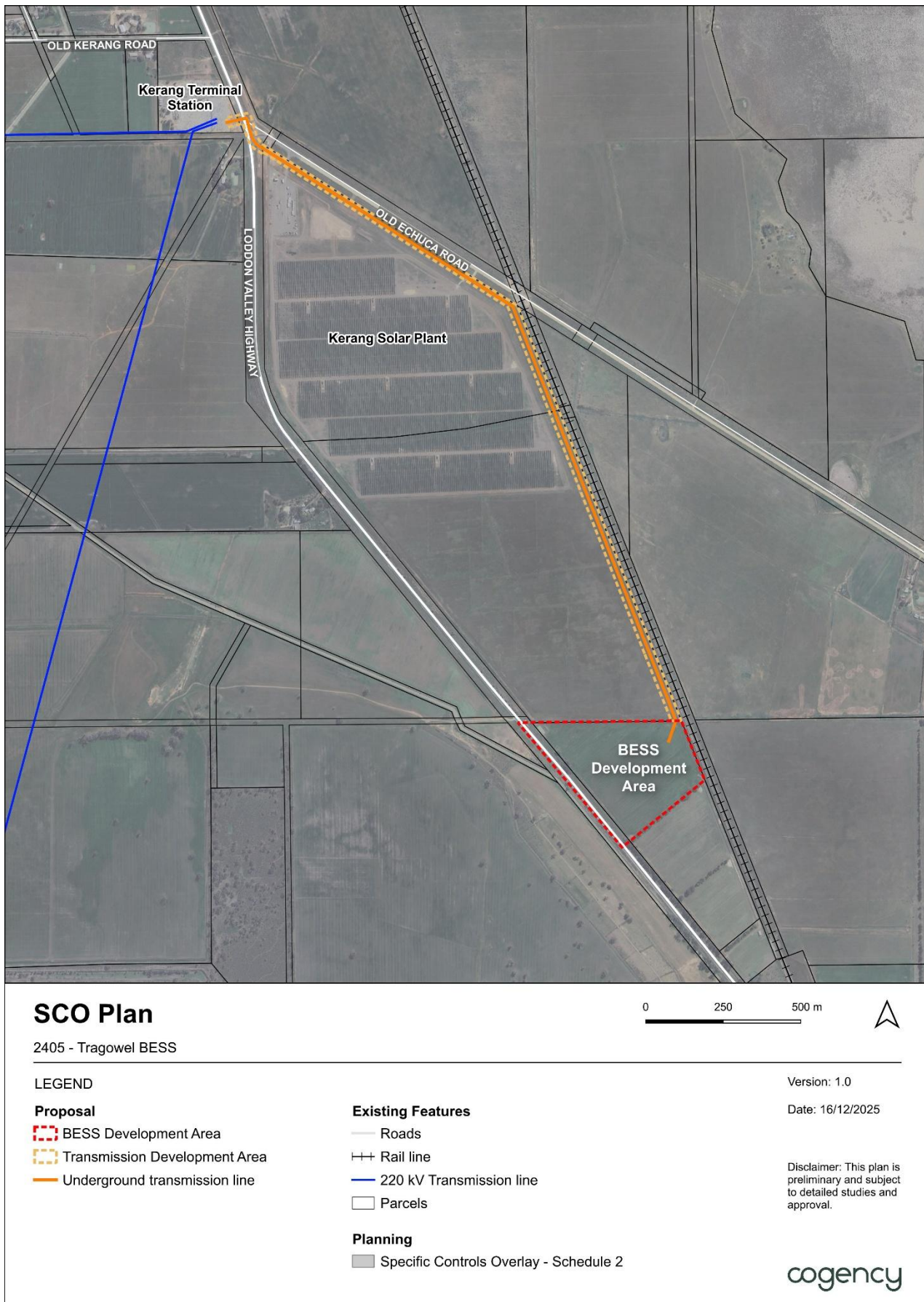


Figure 10 - Specific Controls Overlay Map



Figure 11 - Other Planning Considerations Map

2.2.6 Vegetation

The BESS Development Area is located on agricultural land that is primarily used for animal grazing and growing fodder crops. The BESS Development Area is generally cleared of native vegetation, with patches of invasive grass species and environmental weeds. Existing tree coverage provides vegetation screening along the southern boundary of the BESS Development Area.

There are areas of native vegetation along the western fence line of the BESS Development Area located adjacent to the existing farming irrigation channel located in the Project Site.

The Transmission Development Area is generally cleared of native vegetation with similar coverage of invasive grass species and environmental weeds as the proposed BESS Development Area. Some isolated indigenous species were identified.

Please refer to section 7.1 for further information regarding the vegetation within the Project site.

2.2.7 Topography and hydrology

The BESS Development Area is generally flat and is graded to fall to the north and east. The elevation ranges between 78.5 and 79.45 m AHD,

The Project Site is not immediately adjacent to waterways. There is, however, an existing farm dam at the north-west corner of the BESS Development Area. This dam feeds into a small flood irrigation channel along the western fence line located within the Project Site.

A major irrigation channel is located on the west side of the Loddon Valley Highway that services farming properties in the local area. The site is located within the Loddon River floodplain, with the Loddon River located to the west of the Project Site (see Figure 4).

The BESS Development Area is subject to overland flooding, experiencing a peak 1% AEP flow from the west of 12.3 m³ per second. The maximum level of flooding across the site has been determined to be 79.45m AHD.

2.2.8 Existing infrastructure

2.2.8.1 Energy and Transmission

The Project Site is currently serviced by transmission infrastructure. The AusNet managed Kerang Terminal Station is located 2.4 km north-west of the BESS Development Area and is connected to 220kV/66kV/22kV transmission and distribution power lines.

The immediate and broader area surrounding the Project Site also hosts proposed, approved and operational renewable energy projects. Table 5 sets out the details of nearby renewable energy projects (Figure 12).

Table 5 – Nearby renewable energy projects

Project	Key information
Kerang Solar Plant Distance to Proposal: Adjacent (north) Status: Operational Developer: British Solar Renewables (BSR) Energy	The Kerang Solar Plant is an approximately 30 MW solar energy facility connected to the Kerang Terminal Station. The plant is operated by British Solar Renewables. The land is currently owned by a Green Switch's sister company, Green Switch Australia No 21. The Kerang Solar Plant reached full output in mid-June 2025 and officially opened in October 2025.
Kerang Solar and BESS Hybrid Distance to Proposal: Adjacent (east) and 2km north-west Status: Approved Developer: Australian Clean Energy (ACE) Power	Kerang Solar and BESS Hybrid comprises two closely located sites in southern Kerang, both near the Proposal. Combined, the ACE Power project will provide 161 MW of solar energy and a BESS of 55 MW/ 110 MWh. The Kerang Solar and BESS Hybrid was approved by Gannawarra Shire Council in 2012. Approval for grid connection was received from AEMO in late 2025. Construction is expected to commence in late 2025.

<u>Kerang BESS</u> Distance to Proposal: 2km north-west Status: Approved Developer: ACE Power	Within their Kerang Solar and BESS Hybrid project (see above), ACE Power also received approval from the Gannawarra Shire Council in 2012 for the construction of a 103 MW/206 MWh BESS within the northern site. Approval for grid connection was received from AEMO in late 2023. Construction is expected to commence in late 2025.
<u>Kerang (Acciona) Solar Farm</u> Distance to Proposal: 4.5km north-west Status: Cancelled Developer: Acciona	The Kerang (Acciona) Solar Farm is a proposed 40 MW solar energy facility at 62 Collins Road, Kerang. The project received development approval from the Gannawarra Shire Council in 2017. The 100-ha site was expected to be developed in late 2018. The Proponent understands that the permit has since lapsed and has been cancelled.

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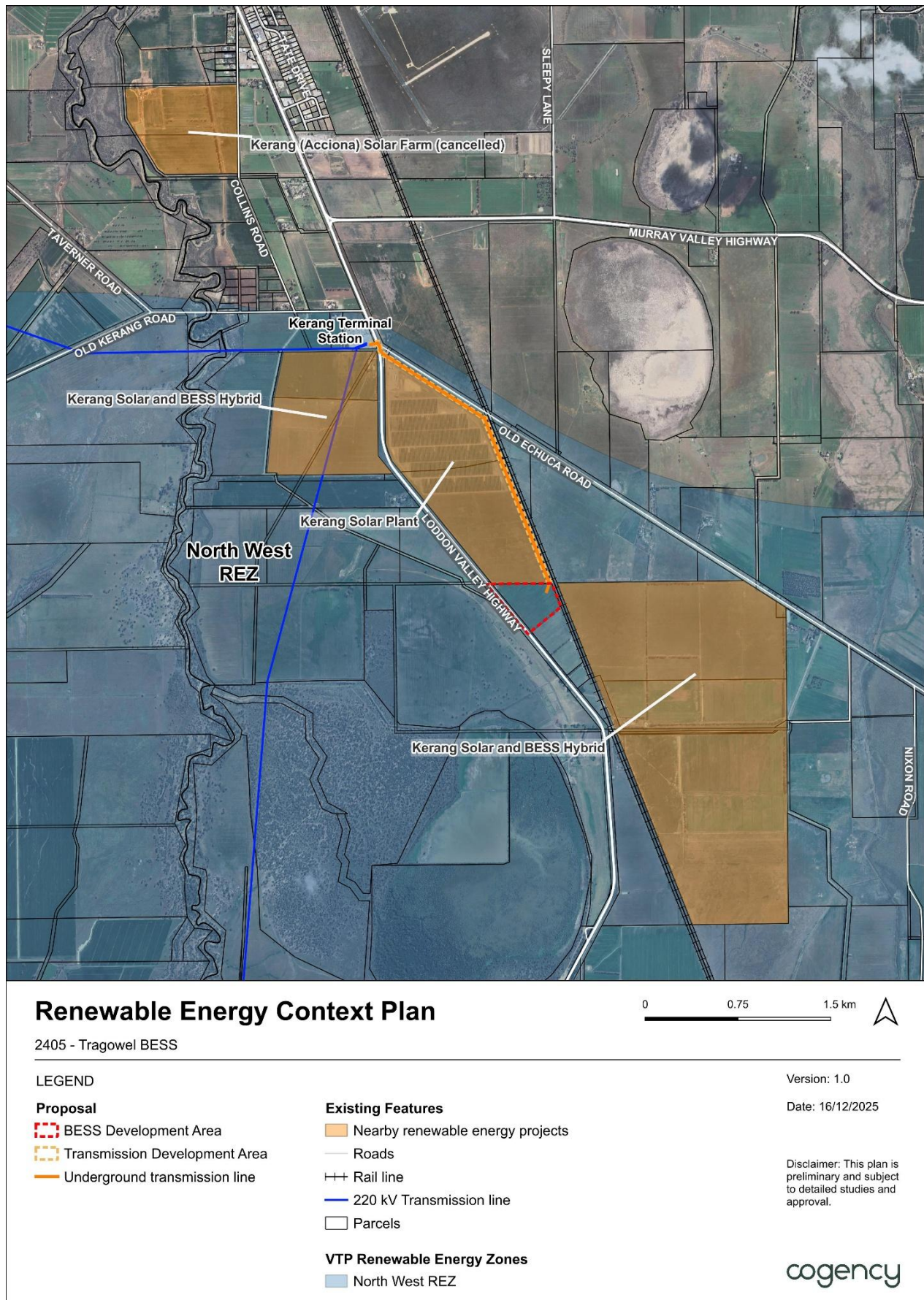


Figure 12 – Existing Energy Infrastructure Context

2.2.9 Surrounding Land Uses

The Project Site is located in a predominantly rural and agricultural area. Land uses surrounding the Project Site include:

- Agricultural land, mainly consisting of paddocks, to the west, east, and south.
- Renewable energy and electricity generation infrastructure to the north (Kerang Solar Plant and Kerang Terminal Station).
- Tragowel Swamp Nature Conservation Reserve to the south-east.
- Transport infrastructure, including the Loddon Valley Highway to the west and Swan Hill railway line to the east.

Refer to Figure 4

2.2.10 Nearby Dwellings

There are a number of dwellings and potentially sensitive receptors in proximity to the Proposal (Figure 13). There are nine dwellings located within 2.5 km of the BESS Development Area, with four of those dwellings located within one km of the BESS Development Area. 47 dwellings have also been identified within five km of the BESS Development Area.

The following dwellings are located within one km of the BESS Development Area:

- 13 McPhail Road, Kerang East, approximately one km to the south (Dwelling 1)
- 3739 Loddon Valley Highway, Kerang, approximately one km to the south-west (Dwelling 2)
- 3987 Loddon Valley Highway, Kerang, approximately one km to the north-west (Dwelling 3)
- 258 Old Echuca Road, Kerang East, approximately 860 m to the east (Dwelling 4).

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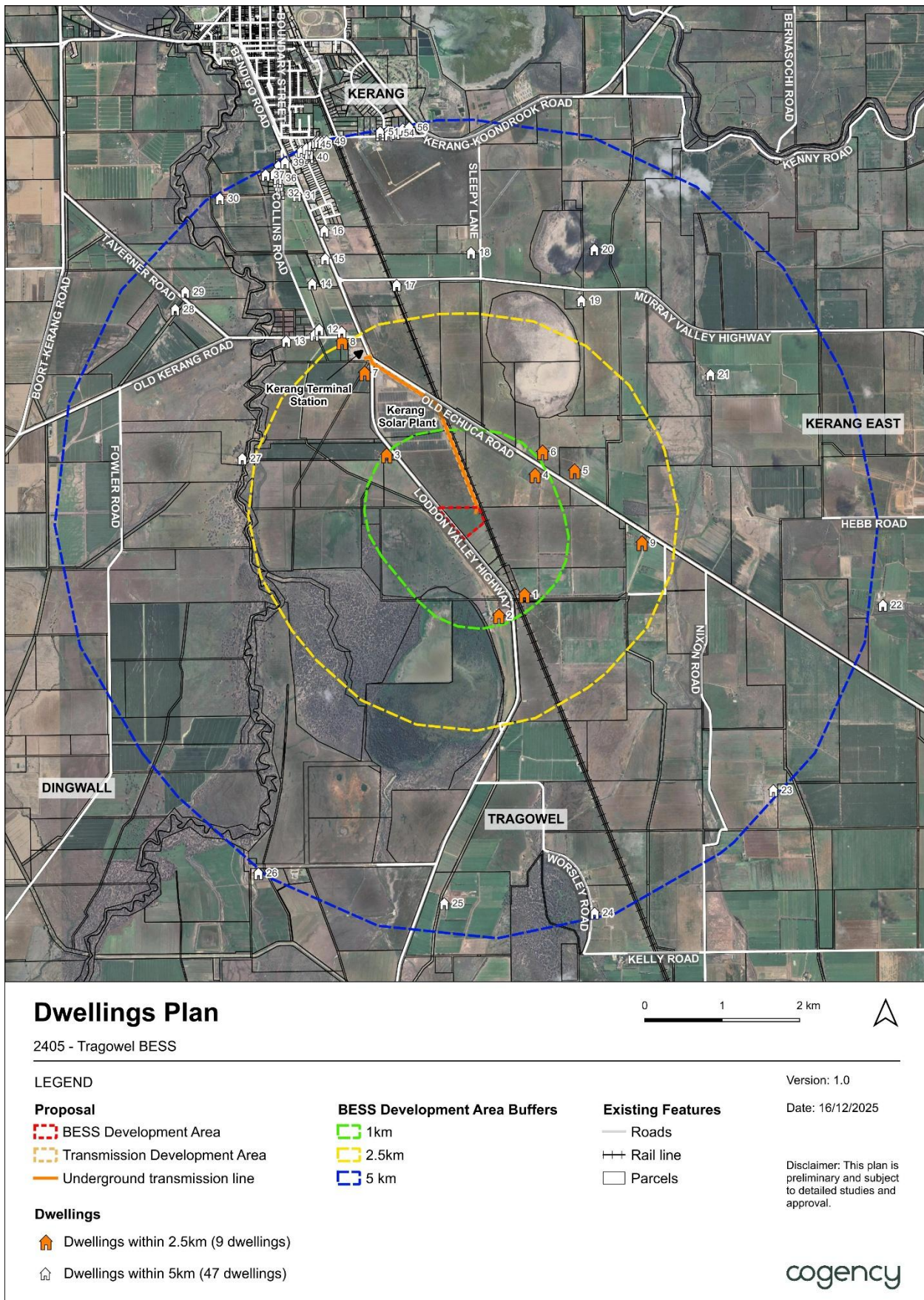


Figure 13 - Dwellings Plan

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3. The Proposal

This section outlines the details of the Proposal as well as justifications and benefits.

3.1 Overview

The Proposal will include:

- BESS compounds
- Switching station and associated electrical infrastructure
- Underground transmission connection to the existing 220/66/22kV Kerang Terminal Station
- Auxiliary power supplies
- Protection and control equipment
- Site office
- Operations and maintenance building
- Access points and internal tracks
- Water storage systems and fire-fighting infrastructure
- Security fencing and monitoring
- Earthworks/benching
- Stormwater detention basins
- Landscaping/screening

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Refer to Figure 2 and Figure 3 for the concept layout of the Proposal. Design plans are also provided at Appendix B.

3.2 Battery Storage

The Proposal is anticipated to use Lithium Ferro(iron) Phosphate (LFP) cells. Figure 14 presents diagrams of a typical LFP cell, Battery Module, and Rack.

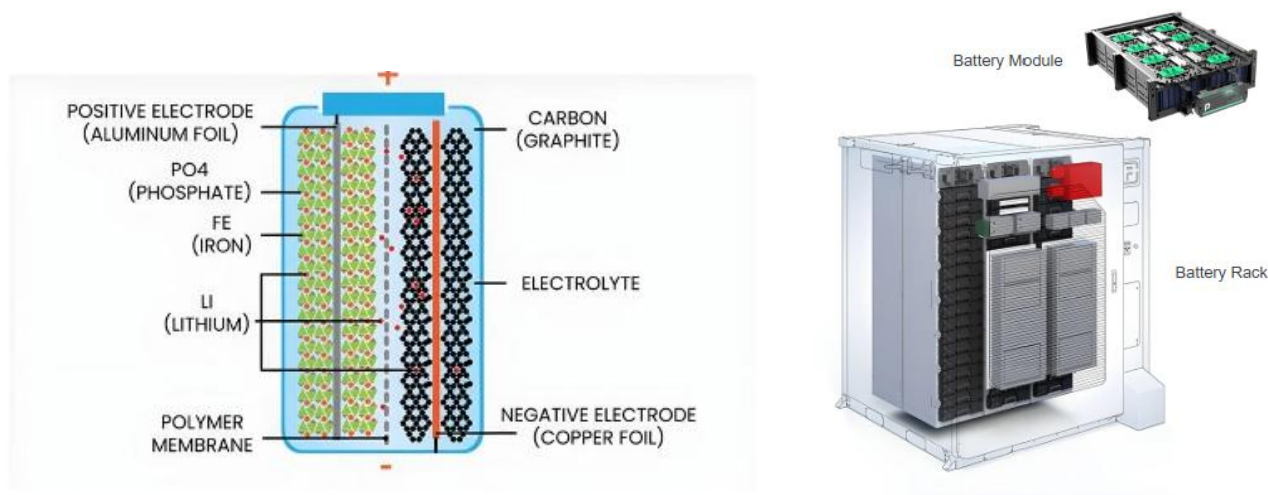


Figure 14 – LFP cells, Battery Module and Rack diagram

The Proposal includes rows of battery units (approximately 172 units), with power conversion system (PCS) in rows on the outside of rows of battery units (refer to Figure 14). Four BESS units are coupled to each PCS. The current layout provides for approximately 3.5 m of separation between BESS units side-to-side, and approximately 1.3 m of separation end-to-end. The battery enclosures house multiple racks of modules and

contain monitoring and communications equipment, a cooling system, and a fire direction and suppression system. The modularity of the batteries allows for ease of construction and maintenance.

The BESS units and PCS will be placed on piers. The piers will have a finished height of 79.75 m AHD to ensure all electrical equipment is above flood levels.

The Proposal includes a managed firebreak of 10 m surrounding all battery units, switching station, and associated infrastructure, in line with the *Country Fire Authority's Design Guidelines Model Requirements Renewable Energy Facilities* (August 2025) (CFA Guidelines).

3.3 Associated Infrastructure

The Proposal includes electrical cabling and infrastructure that connects the BESS units and power conversion units with an on-site substation, which then allows connection to the state's electricity transmission network.

The substation area will include a harmonic filter and control building. The substation, operation and management (O&M) building and related ancillary infrastructure will be on an engineered earthwork platform to ensure they are located above projected flood water levels (refer to Figure 15).

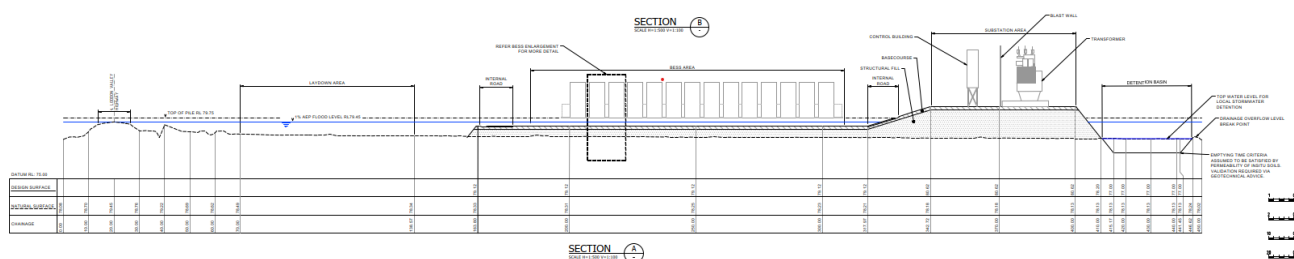


Figure 15 - BESS Development Area Section

To support the facility's operation, there will be an O&M building located in the south-eastern corner of the BESS Development Area (refer also to Figure 2 in Section 1.1).

3.4 Grid Connection

The Proposal includes an underground 220kV transmission line which will connect to the Victorian high-voltage electricity transmission network at the Kerang Terminal Station. The transmission line will run from the north-east corner of the BESS Development Area north over private land towards Old Echuca Road. The transmission line will then turn and head west to the Loddon Valley Highway and the Kerang Terminal Station. The Transmission Development Area will be approximately 8 ha, and 2.5 km in length and between 20-30 m in width.

The Transmission Development Area has been strategically located to minimise impacts on Aboriginal cultural heritage, native vegetation, and to minimise disruption at the Kerang Terminal Station. The justification for the location of the Transmission Development Area is further detailed in section 3.11 below.

3.4.1 Construction of the transmission line

Two construction methods are proposed to facilitate the underground transmission line connection to the Kerang Terminal Station.

Where the transmission line runs from the north-east corner of the BESS Development Area north over private land towards Old Echuca Road, trenching is proposed. This would involve digging a trench approximately 2 – 3 m wide, with a maximum depth of 1.5m. The final depth of the trench will be determined during detailed design and in consultation with AusNet.

Where the underground transmission line heads west and crosses the Loddon Valley Highway to connect to the Kerang Terminal Station, the transmission line would be installed using horizontal direct drilling (HDD). Through this method, the transmission line would be installed underneath the road, seeking to avoid

disrupting the road surface. HDD involves drilling a pilot bore along the proposed transmission corridor, enlarging the bore through reaming, and pulling HDPE conduits into place. Once installed, the transmission line cable is threaded through the conduits, which are then backfilled with a low-thermal-resistivity cementitious grout to enhance thermal performance and provide mechanical stability.

To facilitate the burying of the transmission line, entry and exit insertion pits would need to be established on either side of the highway to enable the transmission line to be threaded through the conduits.

An entry pit would be located on the approach side of the highway reserve, and an exit pit would be positioned near the Kerang Terminal Station entry point. Drilling will typically occur at a depth of approximately 1.2–1.5 m below ground level, subject to geotechnical conditions and regulatory requirements.

The works are expected to take approximately 8–12 working days.

3.5 Access and parking

The BESS Development Area will be accessed by a new access point at Loddon Valley Highway, via a 45m wide crossover with a 10m wide entrance. A secondary access point is proposed approximately 185 m south of the main entry and will be a 6m wide entrance. Swept paths have been undertaken for the Proposal, demonstrating simultaneous two-way movements at the site access for vehicles up to 20 m. However, further detailed design will be undertaken, with the final design of the access points designed to accommodate the largest vehicle type accessing the site during construction.

Access within the BESS Development Area is provided by a 10 m wide access track surrounding all battery units and associated infrastructure. The access track will run from the entrance point east to the BESS Development Area, with a loop surrounding the BESS and infrastructure, connecting to the secondary access point. Additional internal tracks between the rows of BESS units will provide ample circulation.

The internal access tracks will be approximately 10m wide and are designed to accommodate both construction and operational traffic, including access for fire trucks. This has been developed in accordance with the Country Fire Authority Guidelines (Section 4.2 of the *Design Guidelines and Model Requirements: Renewable Energy Facilities, Country Fire Authority, August 2024*), which require access roads to be a minimum of 6 metres

Car parking for construction staff will be provided within a parking area on-site. This is proposed to be in the north-west section of the BESS Development Area. Given the large area of the overall site and the position of the BESS units, all parking demands are expected to be comfortably accommodated on-site.

3.6 Earthworks and drainage

The BESS Development Area will generally follow the natural ground level where practical. To facilitate the development of the Proposal, the BESS Development Area will be graded.

All electrical infrastructure within the BESS Development Area will be mounted using piers, whereby the piers will have a finished height of up to 1.5 m above the existing ground level. The height of the piers has been selected to ensure the electrical infrastructure is placed above the 1% AEP flood level of 79.45 m AHD. Gravel will be placed underneath the mounted BESS components (refer to Figure 16 and Figure 17).

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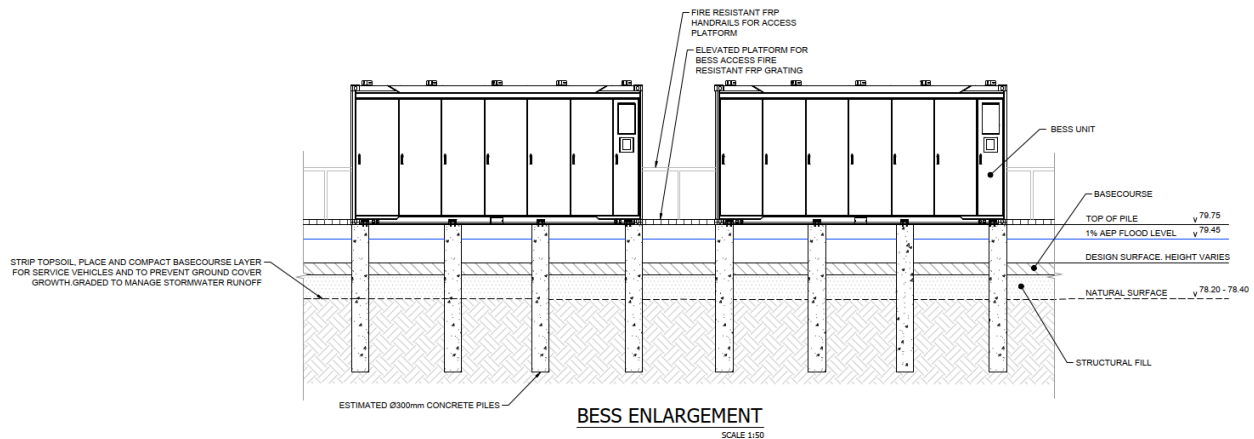


Figure 16 - BESS Elevation Diagram

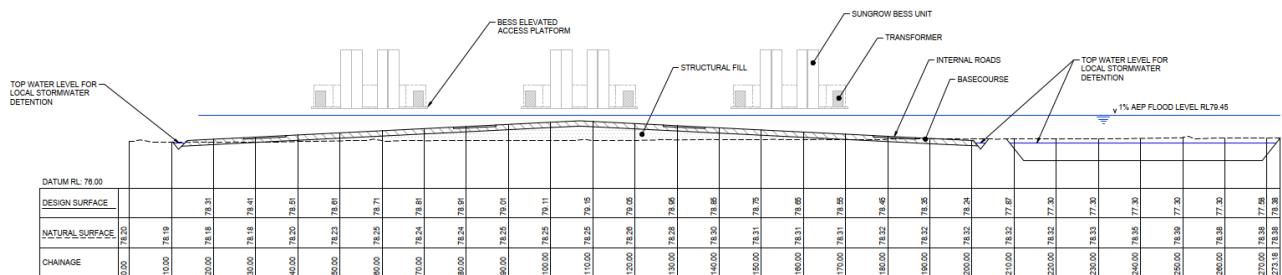


Figure 17 - BESS Elevation Diagram

The substation and O&M building will be constructed on an engineered raised earth platform, approximately 80.62 m AHD (refer to Figure 15 above and Appendix J). To accommodate and raise the equipment above the flood levels, some site preparation and cut/fill will be required. However, some fill material for the earthworks will be transported to the Project Site.

The maximum height of flooding has been determined to be 79.45 m AHD. The catchment authority, the North Central CMA, has advised that all Proposal infrastructure is to be placed at a floor height of 79.75 m AHD (or higher). The BESS Development Area varies in level but is currently approximately 78.3 m AHD. The final height of both the piers and engineered fill is expected to be between 1.3 m and 1.5 m.

Raising all elements of the Proposal, either via piers or raised earth platforms, allows for flood protection and the conveyance of stormwater in the event of inundation. To effectively manage stormwater runoff, the BESS Development Area will be graded to direct water through a vegetated swale into the proposed detention basins. These detention basins will provide storage for retention and function as intercept dams. Additionally, a pumped overland outlet will discharge water to the adjacent property to the north of the Project Site. Refer to section 7.7 for more details on hydrology and stormwater runoff management.

The concept design seeks to ensure that earthworks are balanced, and stormwater runoff will be effectively managed to ensure there are minimal changes to existing flow regimes.

3.7 Firefighting infrastructure

In accordance with the CFA Guidelines, the following infrastructure will be provided:

- Fire hydrant system (AS2419 – open yard protection requirements)
- Firefighting water supply

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- Two access points, including emergency access and internal access tracks that can be used by firefighting vehicles
- Detention basins to contain contaminated firefighting water
- Perimeter firebreak of 10m around the property boundary.

Refer to Appendix I for more details.

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3.8 Additional works

Perimeter vegetation screening will be provided along the northern, western and eastern boundaries of the BESS Development Area to filter views from high-sensitivity viewpoints and reduce the visual impact of the Proposal. The perimeter vegetation screening will consist of a minimum 5m wide vegetated strip, located within the designated vegetation screening areas. The proposed design and location of the screening are informed by the Landscape and Visual Impact Assessment (Appendix G).

An approximately 2-3m high mesh security fence will be installed within the BESS Development Area. The fence will secure an approximately 4 to 4.5 Ha area, to deter theft or vandalism, and prevent unauthorised access to equipment. The height and design finishes of the security fence will be finalised during detailed design, with respect to the existing environment.

3.9 Employment

The development of the Tragowel BESS represents an investment of approximately \$250 million. This Proposal is expected to create around 80 to 120 direct jobs during the construction phase. These jobs will be both local and international, comprising jobs in the fields of manufacturing, electrical, civil engineering, roadworks, cabling, construction, and fencing.

Beyond construction, there are expected to be around 5 FTEs intermittently for the lifetime of the Proposal. These jobs will be responsible for the operations and maintenance of the facility, including reporting, safety, monitoring, and upkeep of the facility. The Proponent is committed to procuring locally to the extent possible, drawing from the skills in Tragowel, Kerang, or the wider Gannawarra Shire region.

The Proposal will play an important role in growing the renewable energy generation and storage industry in Victoria. As the state's energy supply transitions to renewable energy, more demand for storage will be created.

The construction and maintenance of the Tragowel BESS will include upskilling local workers and utilising local contractors and suppliers where possible. This will grow Victoria's ability to build and operate BESS projects, securing the future competitiveness of other projects in the local energy sector.

3.10 Construction, Operation and Decommissioning

Construction

Construction will be a key period of the Proposal's development and is expected to include the following elements:

- Delivery, assembly, and installation of BESS components and ancillary infrastructure
- Installation of fencing, lighting, and site signage, including safety signage
- Earthworks to achieve project bench and hardstand areas
- Establishment of temporary construction compound, car parking spaces, and internal roads
- Installation of underground cabling from the onsite substation to the Kerang Terminal Station involving trenching and horizontal direct drilling

The construction phase is expected to be approximately 12- 18 months.

A detailed Construction and Environmental Management Plan will be prepared in accordance with any conditions of a planning permit.

Operation

The operation of the Proposal will involve charging and discharging of the housed battery units, monitoring and maintenance of the batteries, inverters, switching station, internal cabling as well as general site maintenance and general security monitoring.

Ongoing activities will include the testing and replacement of components, power connection and security, access tracks, and security and undertaking electrical maintenance. The Proposal is expected to have an operational lifespan of initially 23 years, with the option to extend to 43 years (subject to a lease extension - see Section 2.2.3).

Decommissioning

At the end of the Proposal's anticipated operational lifespan and lease term, in accordance with the terms of the lease, the above-ground components would be removed and re-purposed where possible. The decommissioning phase will aim to return the land to its original condition (that is, farmland) and commence site rehabilitation consistent with the surrounding landscape.

Upon commencement of decommissioning, all infrastructure would be removed, with key elements including:

- Removal of all aboveground BESS and substation site infrastructure, including perimeter fencing, site offices, and maintenance buildings
- All laydown, bench, access tracks, and infrastructure to be decommissioned and removed
- Project Site to be returned to pre-lease condition (farmland) and consistency of the surrounding landscape

Other elements, such as the vegetation screen planting, will be retained. Additional features, such as the water detention basins, will be maintained on site at the request of the landowner.

3.11 Project Justification

3.11.1 Site Suitability

The Project Site is well-suited for a BESS and benefits from its location within the proposed North West Victoria REZ and proximity to existing electrical infrastructure, such as the Kerang Terminal Station (Figure 5 and Figure 7).

The Project Site, in particular the BESS Development Area, is considered suitable for the use and development of a BESS for the following reasons:

- Relatively flat topographic conditions, reducing bulk earthworks
- Reasonable distance from sensitive receptors (nearest sensitive dwelling is approximately 800 m from the site)
- Co-located with other energy infrastructure
- Close to grid connection point, via Kerang Terminal Station
- Not characterised as having State significant landscape values or State significant agricultural land
- Minimal existing native vegetation within the Project Site
- Zoning that allows for the use
- History of agricultural activities on the BESS Development Area, meaning it contains low biodiversity values.

3.11.2 Design Iteration

The Proposal has had significant design evolution since the Proponent initially identified the land and considered an early feasibility concept in 2024. Since then, the Proponent has actively revised the Project Site to avoid and minimise potential impacts.

The primary drivers for selecting the Project Site at Tragowel are:

- Direct access to the Kerang Terminal Station – with 220 kV transmission line connections – allowing the Proposal to easily connect into the grid
- Location within the proposed REZ, with proximity to existing and proposed renewable energy generation projects
- Cleared agricultural land, suitable for avoiding ecological constraints.
- Sympathetic setting with good distance between Project Site and sensitive receptors

The Proponent, however, has iteratively evolved the Proposal design to respond to site values (discovered through technical investigations) and engineering requirements.

The three key elements of the Proposal that have undergone design iterations are:

- The Transmission Development Area
- The transmission line running underground (instead of overhead)
- Layout of the BESS within the BESS Development Area.

The specific design iterations for these elements of the Proposal, and factors influencing the siting and design, are summarised further below. These primary considerations are presented in chronological order in

Table 6.

The BESS layout is likely to be further refined as the detailed design progresses, with expected minor changes likely to address new technical information, engineering requirements, and stakeholder and community feedback (as required).

3.11.2.1.1 Transmission line route

In the early planning stages, two transmission corridor options identified: the 'Green cable route' and the 'Orange cable route' (Figure 18). Technical investigations and assessments were undertaken to determine the most suitable and appropriate route for the transmission line. These assessments included ecology, cultural heritage, hydrology, and agricultural impact assessments.

The 'Green cable route,' was proposed to follow the eastern side of the Loddon Valley Highway, while the 'Orange cable route' was proposed along the western edge of the Swan Hill railway line and the southern road verge of Old Echuca Road. Both options were proposed to extend from the substation on the BESS site and run approximately 2.5km north-west from the BESS Development Area to connect into the Kerang Terminal Station.

The Green cable route was initially the preferred transmission corridor for the Proposal, with the Orange cable also considered, particularly due to the potential to secure easements for land access. Based on technical assessments, the Green cable option was determined to be more constrained and less suitable for the Proposal. Key considerations included its intersection with areas of Aboriginal Cultural Heritage sensitivity (see Figure 11) and the potential presence of lunettes - crescent-shaped dunes of clay and sand - within the southern and central areas of the Green cable route. Additionally, the Green cable posed a greater impact on native vegetation, requiring some removal, although this would have remained limited.

The Orange cable route was found to have minimal impact on ecology, native vegetation, and Aboriginal Cultural Heritage. Consequently, it was determined to be the preferred transmission corridor, and the Project Site was subsequently updated to reflect the chosen Transmission Development Area.

3.11.2.1.2 Underground Transmission Line

In the early feasibility and design phases, both overhead and underground options were considered for the transmission line.

Having regard to land constraints of the proposed transmission easement, visual and landscape impacts, as well as general community sentiment about electricity transmission infrastructure, the Proponent determined the transmission line would run underground from the substation to the connection point at the Kerang Terminal Station. The underground option was chosen to minimise the visual impact of the transmission line on the surrounding area and requires less space for the easement.

3.11.2.1.3 BESS Layout

The BESS layout has also undergone significant design changes. In particular, to mitigate and manage flood risk and impact on the BESS, and within the BESS Development Area. The BESS was originally sited on the western side of the BESS Development Area (Figure 19). This was due to proximity to the Loddon Valley Highway. Technical hydrology assessment, however, concluded that the potential flood risk for the proposed location of the BESS was a constraint.

Accordingly, the BESS layout was revised to respond to the constraints of the project site and to help mitigate and minimise potential flood impacts, with the BESS located more centrally within the BESS Development Area and raised on platforms.

Flood risk and impacts have also informed the proposed construction methodology, earthworks, and siting of the BESS (refer to Section 3.6).

Table 6 – Proposal Design

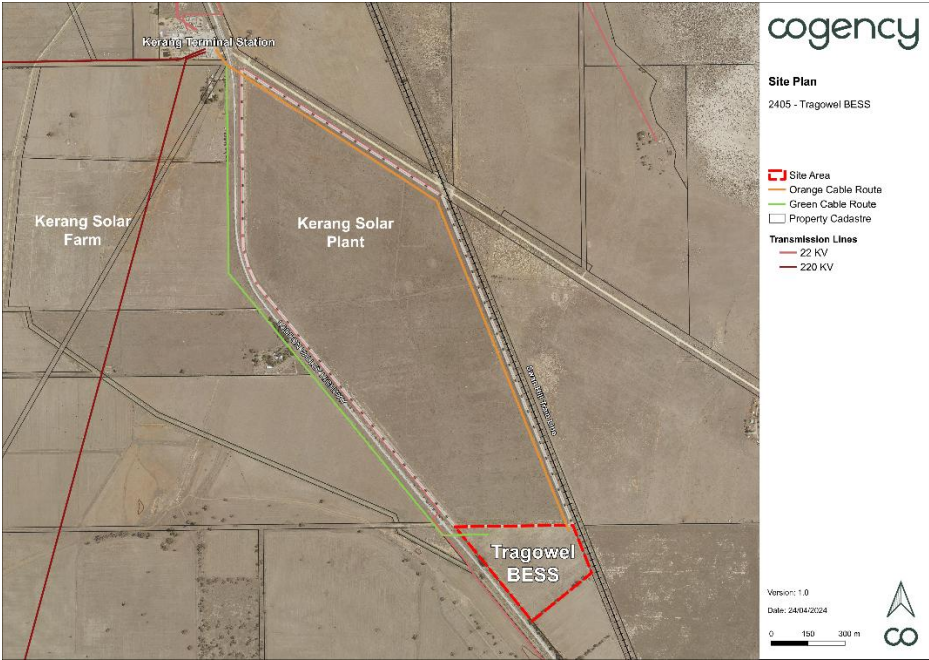
Design version	Summary of design iteration	Influencing Factors
	Early-stage design explored two transmission cable routes (Green and Orange).	<i>Green cable route option was originally considered the preferred transmission cable route. Orange cable route option was also explored, and subsequently selected.</i>

Figure 18 - Transmission Cable Route Options

Design version	Summary of design iteration	Influencing Factors
	Early-stage siting of the BESS in the western portion of the BESS Development Area.	Proximity to Loddon Valley Highway
	Refinement to reflect Orange cable route selected for transmission corridor, running along the western edge of the Swan Hill railway line.	<i>Technical investigations (ecology, cultural heritage, agriculture) indicated that the Green cable route was more constrained and determined that the Orange cable route was preferred.</i>

Figure 19 - Initial BESS layout design

Figure 20 - Transmission Corridor (Orange cable route) (February 2026)

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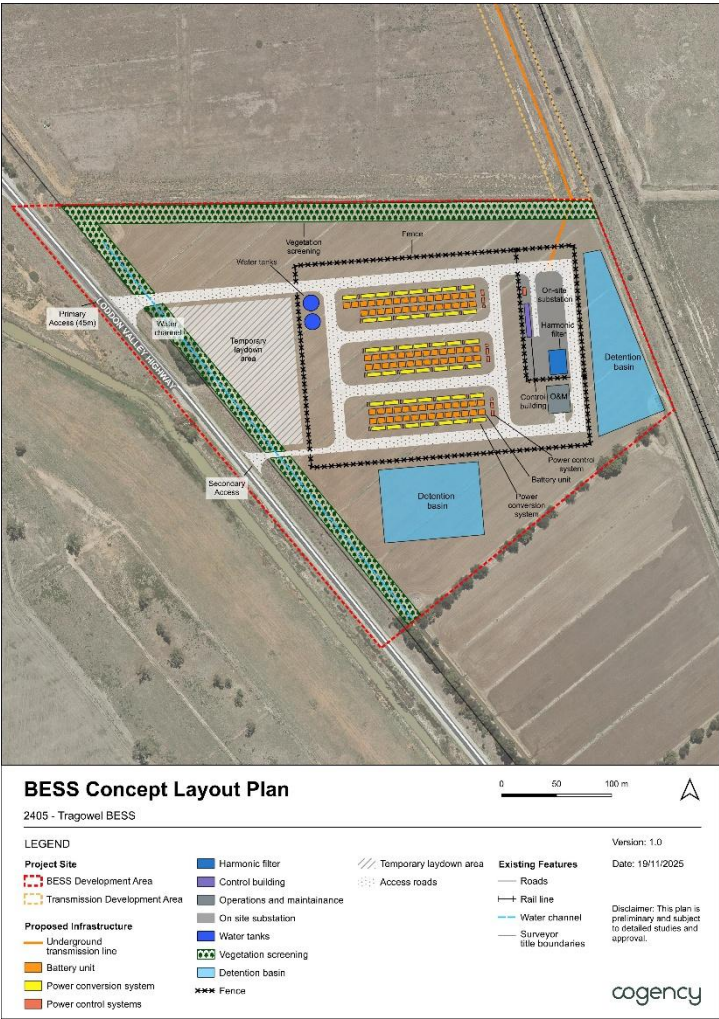
Design version	Summary of design iteration	Influencing Factors
 BESS Concept Layout Plan 2405 - Tragowel BESS Version: 1.0 Date: 19/11/2025 LEGEND Project Site - BESS Development Area - Transmission Development Area Proposed Infrastructure - Underground transmission line - Battery unit - Power conversion system - Power control systems Existing Features - Roads - Rail line - Water channel - Surveyor title boundaries Other Features - Harmonic filter - Control building - Operations and maintenance - On site substation - Water tanks - Vegetation screening - Detention basin - Fence Temporary laydown area Access roads Disclaimer: This plan is preliminary and subject to detailed studies and approval.	Refinement made for Planning Permit Submission in February 2026	Technical investigations (flooding) confirmed that the proposed siting and design of the BESS increased potential flood risk and impact.

Figure 21 - BESS Concept Layout (February 2026)

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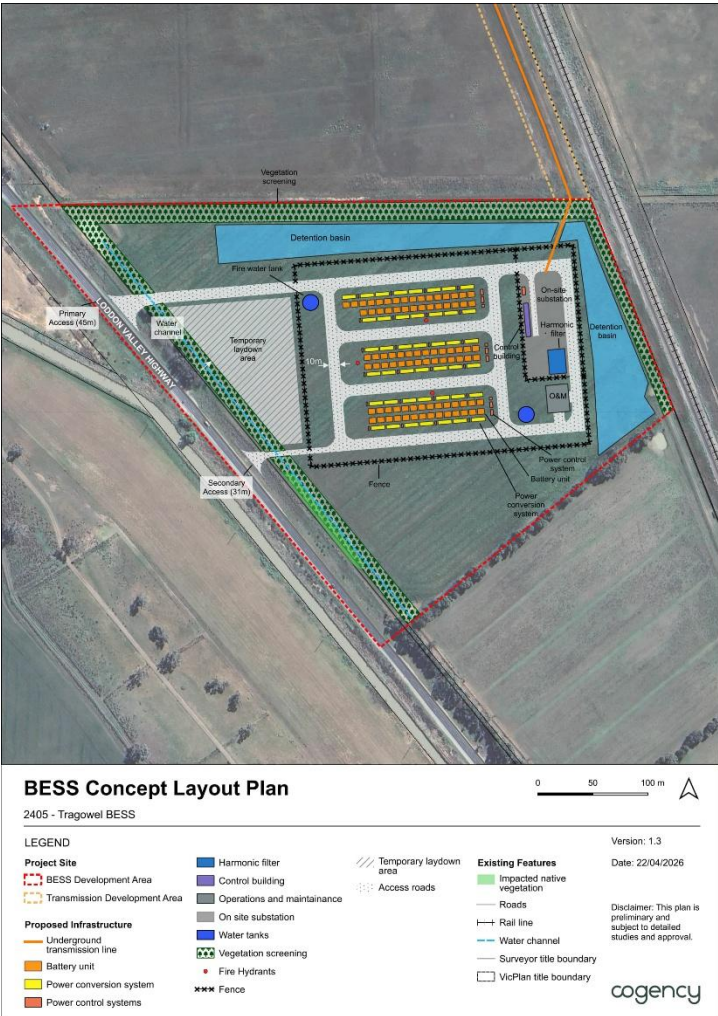
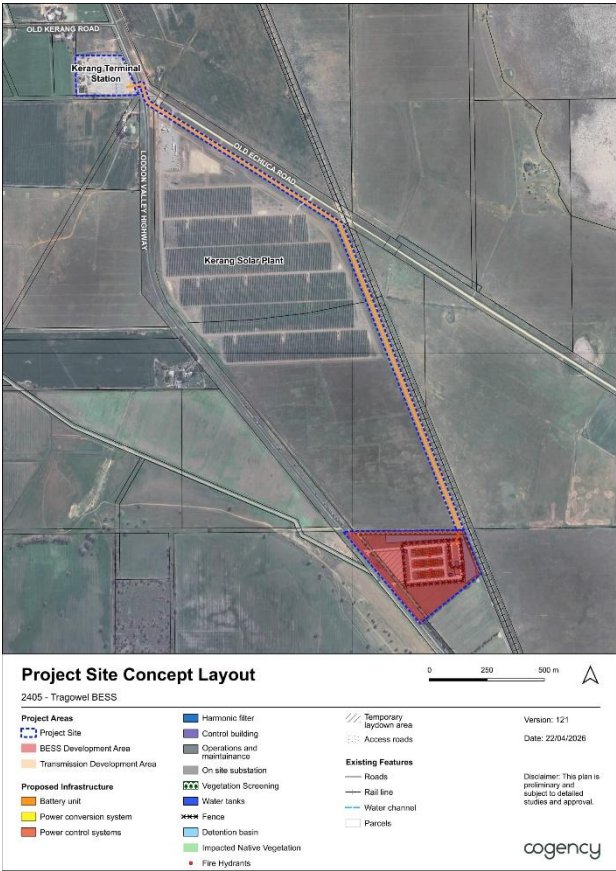
Design version	Summary of design iteration	Influencing Factors
 BESS Concept Layout Plan 2405 - Tragowel BESS LEGEND Project Site - BESS Development Area - Transmission Development Area Proposed Infrastructure - Underground transmission line - Battery unit - Power conversion system - Power control systems Existing Features - Harmonic filter - Control building - Operations and maintenance - On site substation - Water tanks - Vegetation screening - Fire Hydrants - Fence Other Features - Temporary laydown area - Access roads - Impacted native vegetation - Roads - Rail line - Water channel - Surveyor title boundary - VicPlan title boundary Version: 1.3 Date: 22/04/2026 Disclaimer: This plan is preliminary and subject to detailed studies and approval. cogency	Refinements made to the final design for Section 50 Amendment	Minor changes to address discrepancies in stormwater management and vegetation screening prior to advertising

Figure 22 - Final BESS Concept Layout Plan (as shown in Figure 2)

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Design version	Summary of design iteration	Influencing Factors
 Figure 23 – Final Transmission Corridor (Orange cable route) (as shown in Figure 3)	Refinements made to the final design for Section 50 Amendment	<i>Minor changes to address discrepancies in stormwater management and vegetation screening prior to advertising</i>

3.11.3 Why Battery Energy Storage?

There are a number of reasons for developing a BESS in Victoria.

Battery energy storage is essential to ensuring Australia’s electricity grid is prepared for the phase out of traditional coal-fired power stations in the coming decades. The variability of renewable energy sources means that there is a need for storage within the grid to supply power during periods of low generation.

Further, the continued popularity of domestic rooftop solar is leading to an oversupply of generation in the middle of the day during sunny periods, offering the opportunity to store power during this time and release it in the evening.

Battery storage technology has advanced to a point where the delivery of numerous grid-supporting batteries is cheaper and more efficient compared to other energy storage solutions, such as pumped hydro.

They will contribute to form a crucial part of ensuring an adequately firm renewable energy capacity, as directed in AEMO’s Integrated System Plan, which highlights a need for 46GW/640GWh of dispatchable storage by 2050.

The Tragowel BESS will strengthen grid stability for communities in the region through the ability to rapidly increase or decrease output, by providing ‘ancillary services’ such as frequency and voltage support.

In supporting the introduction of more renewable energy generation, the Proposal will assist with Victoria’s renewable energy transition and support the legislated Victorian Renewable Energy Target for 50% of electricity to be sourced from renewables by 2030, which will increase to 65% by 2030 and 95% by 2035.

Importantly, the Proposal will be crucial to achieving the soon to be legislated Victorian energy storage targets of at least 2.6 GW by 2030 and 6.3 GW by 2035.

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4. Community and Stakeholder Engagement

Community and stakeholder engagement is fundamental to delivering positive and effective outcomes for both energy projects and the local community. Evidence from across Australia and internationally has shown that effective engagement increases the likelihood of establishing and maintaining energy facilities that bring the most mutual benefit to all stakeholders. Proactive, meaningful, inclusive, and robust engagement practices can therefore be seen as an investment in two outcomes: strong communities and the future success of the energy industry.

This Section outlines the engagement principles, details of the engagement activities, and the materials provided to the stakeholders and community.

For full details, please refer to Appendix C (Communication Materials) and Appendix M (Engagement Summary Report).

4.1 Objectives

The community and stakeholder engagement plan developed for the Proposal is in accordance with DTP's *Community Engagement and Benefit Sharing in Renewable Energy Development: A Guide for Renewable Energy Developers (updated 2021)*, the Clean Energy Council's *Best Practice Charter for Renewable Energy Projects* (2018), and the *Engagement Institute's Public Participation Spectrum* (2018).

The Proponent acknowledges that active and early engagement with the community and other relevant stakeholders is a crucial part of the planning process, as it helps to foster greater understanding of and support for the Proposal, and to improve the design and development outcomes through the exchange of knowledge and information.

The Proponent is committed to delivering best practice engagement, with the overarching objective of ensuring that the identified community and stakeholder groups are proactively and meaningfully informed, consulted and involved, and that the benefits of the Proposal are genuinely felt by the local community.

The engagement objectives are to:

1. Build strong connections with the host landowner, neighbours, local industry, and the wider Tragowel community to gather support for the Proposal during the planning process.
2. Promote the Proposal's benefits by establishing clear and consistent messaging to manage misinformation about the Proposal, ensuring people can access information, provide feedback, and stay informed.
3. Develop a thorough understanding of the local aspirations and concerns that relate to the Proposal and work with them to achieve mutually beneficial outcomes.
4. Deliver a robust engagement program that informs and consults stakeholders (as appropriate) throughout the Proposal's lifecycle, and sets clear expectations, to build trust in the processes and understanding of the technology.
5. Keep an up-to-date record providing evidence of all engagement activities undertaken throughout the process and establish a comprehensive database of stakeholders for the life of the Proposal.

4.2 Principles

The *Best Practice Charter for Renewable Energy Projects* (2018), developed by the Clean Energy Council, outlines a voluntary set of commitments for those engaged in the development of clean energy projects. These commitments serve to clearly communicate the standards that proponents of renewable energy projects will need to uphold. The following nine principles of engagement will define engagement on the Tragowel BESS during all phases of the Proposal, including design, planning, construction, operation, and decommissioning.

Beyond the statutory requirements of the Proposal, the Proponent is committed to ensuring sensitive and respectful engagement with the First Nations communities. The Proponent's approach to engagement with Traditional Owners is based on principles adopted from *First Nations Clean Energy Network's Aboriginal and Torres Strait Islander Best Practices Principles for Clean Energy Projects* (2022).

Table 7 presents the engagement principles for the Proposal.

Table 7 – Engagement Principles

Mutual benefit and respect Deliver shared outcomes of mutual benefit in an equitable way for the local host community, landowners, and developer. Provide a space for genuine dialogue where people can participate in respectful discussions that help to identify mutually agreeable solutions. Proactive, well-planned, and regular engagement is effective in achieving mutual understanding and openness. 	Relationship-building Build genuine local relationships, networks and links to key local leaders or organisations, by enabling many avenues for interaction and involvement, and allowing key stakeholders to become project advocates and feedback loops. Help the local community to identify positively with the project and integrate it into their sense of community and place. 	Authenticity Have a strong, authentic, and local presence in the local community by providing dedicated staff who are reliably and readily available as the community's trusted 'translator' of technical knowledge, to explain information to the community and stakeholders in a simple yet effective way and to address any misinformation. 
Ongoing engagement Provide diverse and ongoing opportunities for engagement throughout the lifecycle of the project. Monitor and evaluate the community engagement, benefit sharing and social impact management programs to identify areas for improvement and/or modification. 	Responsiveness Listen and respond to community needs and concerns in a comprehensive and timely manner. Maintain a record of the key issues raised and/or complaints received to date and how they were resolved. 	Social feasibility Understand, minimise, and offset the risk of negative social impacts across a project's lifecycle by taking into consideration the many social factors, and using appropriate social analysis tools and integrating them, alongside the technical and economic factors, into the proposed development. 
Inclusiveness Identify a wide range of different stakeholders across the local and regional communities and ensure that the channels and methods of engagement are tailored to the needs of each stakeholder group so that they are engaged with appropriately and effectively. 	Transparency, trust, and accountability Commit to an ongoing process of monitoring, evaluating, and disclosing information about the project's activities and impacts. Adhere to promises and commitments, to help develop legitimacy and credibility – and ultimately trust – within the community. Provide transparency about the process and how decisions are made. 	Fairness Ensure that consultation is two-way and that opportunities exist for local community members and other stakeholders to participate, with access to balanced information, and having their ideas justly considered, responded to, and incorporated where possible. 

4.3 Engagement Activities

As part of the early design and planning phase of the Proposal, the project team, with support from Cogency, undertook several engagement activities prior to the planning submission in accordance with the engagement strategy. These activities are described below, with further detail supplied in the attached Engagement Summary Report (Appendix M).

The engagement program to date has focused on near neighbours, the local community, and other stakeholders.

A variety of different communication materials were distributed to stakeholders and the community throughout the engagement process. These include fact sheets, posters, a newspaper advertisement, and a webpage within the Tragowel BESS website.

Copies of these communications materials are provided in Appendix C.

4.3.1 Community Engagement

4.3.1.1 Website Development

A website was developed and launched in September 2025 to provide a single source of information for stakeholders and the local community, to provide updates as the Proposal progresses, and to provide an opportunity to contact the project team with any enquiries. The website can be accessed at <https://potentiaenergy.com.au/project/tragowel-bess/>.

4.3.1.2 Fact Sheets

On 21 and 22 August 2025, a letter of introduction and fact sheet were mailed or delivered via direct letter drop to 57 properties within 5 kilometres of the Project Site. The purpose of the letter and fact sheet was to introduce the Proposal and inform residents of planned engagement activities. This included information regarding an upcoming neighbourhood doorknock and community drop-in session.

4.3.1.3 Door Knock

A community doorknock was held on 17 and 18 September 2025 to reach out to households living closest to the Proposal. The purpose of the door knock was to introduce the proposed Tragowel BESS, explain BESS technology and the need for it, while also providing residents to ask questions or raise immediate concerns.

The project team door-knocked nine dwellings within a 2.5 km radius of the proposed BESS, with calling cards left for residents who were not available on the day. Figure 24 shows the Door Knock Plan.

Five of the nine community members who were door knocked were home. Of those five, two expressed positive sentiment, one was neutral, and two expressed concerns.

Key concerns raised by near-neighbours included:

- Suspicion of developers
- Impacts from the existing renewable energy projects
- Floods
- Fire risk
- Lack of knowledge around project technology.

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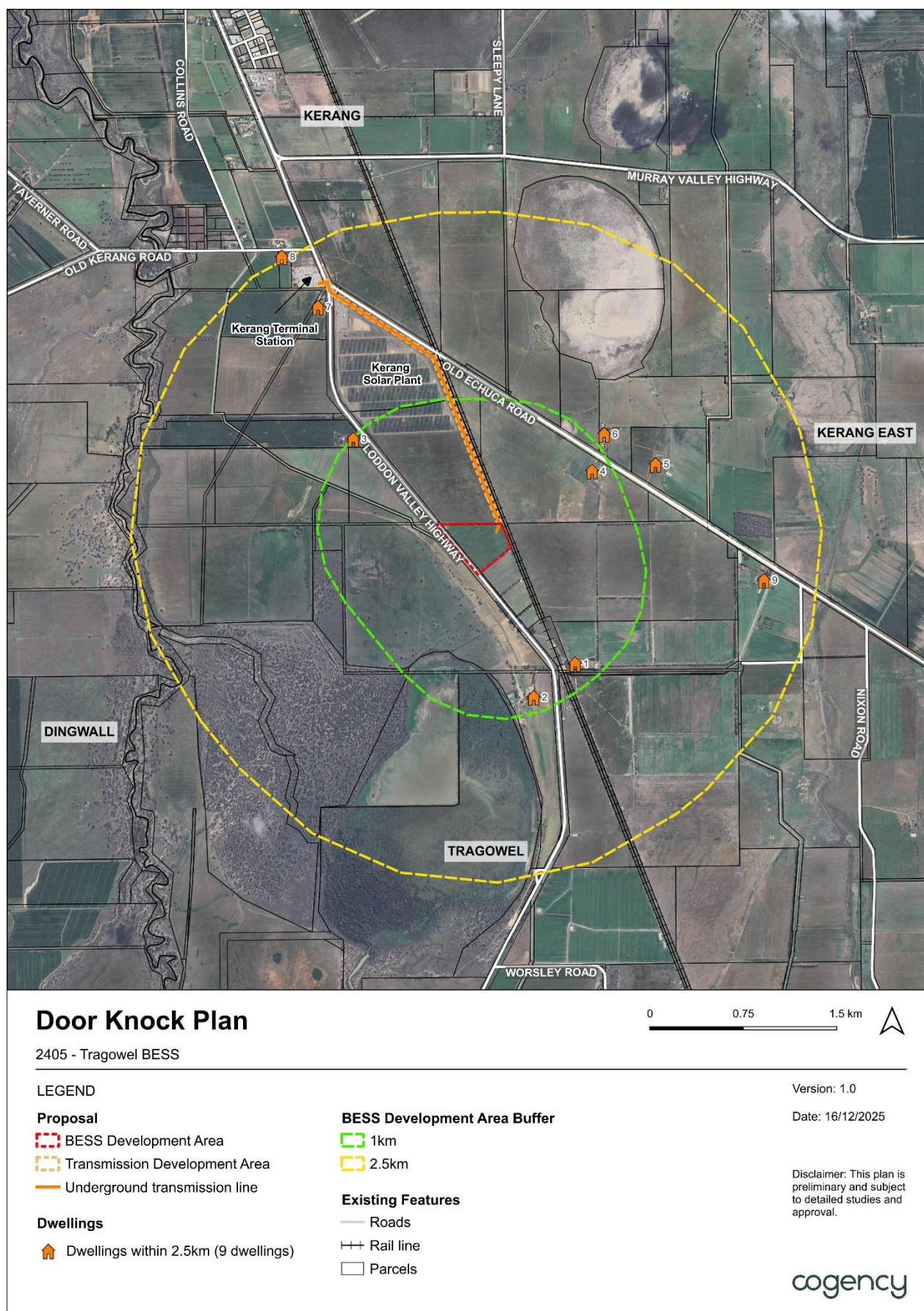


Figure 24 - Door Knock Plan

4.3.1.4 Community Drop-In Session

To ensure that the broader community had opportunities to be involved and provide input on the Proposal, a Community Drop-In Session (CDIS) was held on Tuesday, 11 November 2025, at the Kerang Memorial Hall between 1:00 pm and 5:00 pm (Figure 25 and Figure 26). The purpose of the session was to give the local community and other stakeholders an opportunity to meet the project team, learn more about the Proposal, ask questions in person and encourage engagement in the planning process. The CDIS also allowed community members to establish points of contact for the Proposal.

The drop-in session was hosted by Green Switch and Potentia Energy, supported Cogency, and included seven members of the project team. Information included fact sheets, a site plan, multiple A1 boards (including 'Project overview', 'About the Proponents', 'What is a BESS', 'Planning pathway', and a concept layout of the BESS).



Figure 25 - Community Drop In Session

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Figure 26 - Community Drop In Session

The CDIS was advertised in both the print and online publications of local newspapers (Gannawarra Times and North West Farmers) during the weeks beginning 27 October 2025 and 3 November 2025. On 16 October 2025, invitations to the community drop-in session were also mailed or delivered directly to 57 properties within five km of the site.

Email invitations, including the project fact sheet, were also sent to the following people/organisations:

- Gannawarra Shire Council – including the planning & economic development team, community wellbeing team, and infrastructure and development team, and the Councillors
- Wamba Wamba Aboriginal Corporation
- Barapa Barapa Aboriginal Corporation
- Wiran Aboriginal Corporation
- CFA HQ and Kerag Fire Brigade
- DTP
- First Peoples State Relations
- Member for Mallee (Upper House)
- Member for Murray Plains (Lower House)

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The above organisations were invited to distribute the community information day email around their networks.

Eight people attended the CDIS including officers and a Councillor from Gannawarra Shire Council, a member of the Kerang Fire Brigade and local community members.

Attendees expressed a mix of curiosity, support, and concern regarding the Proposal. While they were generally not opposed to BESS proposals, many were disappointed by the lack of communication from proponents of other BESS or renewable energy projects in the area.

Overall, attendees recognised the potential benefits of major infrastructure projects in creating jobs, upskilling local workers, and diversifying the region's economy. However, they emphasised the importance of genuine engagement with the local community, sustainable benefit-sharing ideas, and clear communication.

Some of the topics raised by the community and discussed with the project team were:

- Fire management questions
- Flood management questions
- Sentiment of consultation fatigue among the broader community
- Native vegetation and pest management
- Ideas for benefit sharing

A valuable outcome of the drop-in session was ideas for benefit-sharing within the local community, including:

- Focus on strategic partnerships and capacity building within the community
- Social inclusion programs, including to support elderly residents
- Sustainable neighbourhood house programs
- Arts and culture events
- Mental health first aid for young people
- Youth workforce training and certification (to retain local workforce).

Attendees were encouraged to provide contact information to receive updates from the project team. Those who provided a contact email address were sent a thank you email on 3 December 2025 encouraging further feedback and queries to be directed to the project team.

4.3.2 Stakeholder engagement

4.3.2.1 DTP

A pre-application meeting was held on 26 April 2024 with members of the DTP Renewables Development and Approval Area team, Michael Juttner, and Hannah Wright. The purpose of the meeting was to receive high-level feedback and guidance on the planning application process. The meeting broadly discussed the following aspects of the Proposal:

- Planning application pathway and lodgement
- Cultural heritage
- Biodiversity and relevant planning controls (Environmental Significance Overlay)
- Bushfire risk and mitigation measures
- Engagement with relevant authorities, including the North Central Catchment Management Authority and the Country Fire Authority.

4.3.2.2 Gannawarra Shire Council

A pre-application meeting was held in May 2024 with Gannawarra Shire Council and the Tragowel BESS project team to introduce the Proposal and give a formal briefing presentation.

A subsequent meeting was held on 17 September 2025. Given the length of time since the initial pre-application meeting, the purpose of the briefing was to re-engage with Gannawarra Shire Council about the Proposal. The presentation focused on the planning process, key engagement expectations, and key issues, including the DFP process, native vegetation removal, fire, noise, and traffic issues.

Broadly, the Council gave in-principal support of the Proposal at both pre-application meetings, with discussions focusing on the following aspects:

- Sensitive receptors and nearby dwellings
- Landscape and visual impact mitigation measures
- Consultation fatigue within local community
- Other major infrastructure projects proposed in the area
- Engagement and benefit sharing opportunities, including Council's own 'Community Benefits Model.'

4.3.2.3 FPSR and First Nations Groups

Engagement with First Nations has primarily occurred through the appointed Cultural Heritage Consultant, GML. Currently, there is no RAP designated for the region where the Project Area is located. As a result, most communication has taken place directly with FPSR concerning Aboriginal cultural heritage and the CHMP process.

Despite the absence of an RAP, several First Nation groups have been contacted that have an interest in the region surrounding the Project Area. These groups include the BCAC, WWAC, and Wiran Aboriginal WAC.

Pre-field work meetings have been held with FPSR in May 2025. Findings of the desktop assessment and the archaeological discoveries in the vicinity and potential findings in the activity area were presented. The methodology for both standard assessments (surveys) and complex assessments (excavations) was discussed, with the understanding that the locations for subsurface testing would be agreed upon in consultation with field representatives from BBAC and WWAC.

Before commencing the standard and complex assessments, a draft of the desktop assessment was shared with BBAC, WWAC, and WAC for their review and comments. However, representatives from these Traditional Owner Groups provided no further feedback.

4.3.2.4 CFA

A pre-application meeting was held on 17 April 2024 with Matthew Allen from the CFA. The purpose of the meeting was to identify any potential risks and considerations that may inform the design of the BESS.

The following issues were discussed at the meeting:

- Secondary / emergency access
- Siting of the BESS to mitigate flood risk
- Bushfire risk prevention measures, including landscaping
- Fire protection equipment requirements and CFA guidelines.

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Initial contact has been established with the local Kerang CFA. The proponent will continue to engage with CFA HQ and local CFA brigades to minimise fire and bushfire risk to the fullest extent possible.

4.3.2.5 North Central CMA

A pre-application meeting was held on 29 May 2024 with Nathan Treloar from the North Central CMA. The purpose of the meeting was to understand the potential flooding risks associated with ESO4 and any considerations that may inform the design of the BESS.

The following issues were discussed at the meeting:

- Flooding in the region
- Impact to Loddon Valley Highway in the event of flood
- Engagement with local community about previous flood experiences

- Flood protection and mitigation measures

DCE, the subconsultant responsible for hydrology and stormwater management at the Project Site, completed additional correspondence with North Central CMA in August 2025. Communication occurred through email, online meetings, and phone calls. Following the pre-application meeting, North Central CMA provided further information regarding the groundwater levels at the Project Site.

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5. Legislation, Policy, and Guidelines Context

This section outlines the legislative, policy, and guidelines relevant to the Proposal.

5.1 Policy and strategic summary and alignment

The Proposal is strategically supported by a number of policies at the Commonwealth, State, Regional, and Local levels. When viewed holistically, the Proposal supports the relevant objectives and actions of these policies, with particular regard to efforts for greater energy storage to decarbonise Australia's energy generation, in turn minimising greenhouse gas emissions and supporting renewable energy generation infrastructure.

Table 8 outlines the policies, legislation, and plans that are relevant to the Proposal and provides a brief assessment of the Proposal's alignment with the relevant objectives and actions of each policy and/or strategy.

Table 8 – Policy and strategic alignment

Legislation / Policy	Relevant Objectives & Actions	Proposal Alignment
Commonwealth		
Paris Climate Agreement 2016	- Strengthen the global response to the threat of climate change - Maintain global average temperature to well below 2°C above pre-industrial levels and pursue efforts to limit temperature increase to 1.5°C - Achieve net zero emissions by 2050 and inscribe low emissions technology stretch goals.	The Proposal will contribute to Australia's commitment to the Paris Climate Agreement by allowing more renewable energy projects to connect to the National Energy Market (NEM) and is in line with recent Federal announcements regarding a long-term emissions reduction strategy.
Climate Change Act 2022	- Advance Australia's response to climate change - Promote accountability in governance and policy making with regard to climate change - Achieve Australia's greenhouse gas emissions reduction targets, per s 10 of the Act, at least 43% below 2005 levels by 2030, and net zero by 2050.	- The Proposal supports Australia's greenhouse gas reduction targets by storing and distributing new renewable energy that can contribute to the replacement of fossil fuel-based energy - This Proposal will also help reduce reliance on fossil fuels by enhancing the reliability and stability of renewables, contributing to grid decarbonisation - The Proposal will also provide construction and maintenance jobs for the local and wider community, helping develop a new employment industry centred on green infrastructure.
Australian Renewable Energy Target Scheme	- Reduce greenhouse gas emissions in electricity sector - Encourage generation of electricity from sustainable and renewable sources - Investment in new renewable energy projects until the target of 33,000 gigawatt-hours of renewable electricity generation is met and sustained until 2030.	The Proposal supports Australia's renewable energy targets by seeking to reduce greenhouse gas emissions through the storage and distribution of electricity through renewable sources.
AEMO Integrated System Plan 2024	- Provide essential support for Australia's energy transition - Triple grid-scale variable renewable energy by 2030, and increase it six-fold by 2050 - Almost quadruple firming capacity to support variable renewable energy.	- The Proposal will contribute to grid stability and management - The Proposal will help improve firming capacity for the NEM and Victoria's electricity transmission network as it transitions to variable renewable energy sources.
Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)	- Ensures that development proposals do not significantly impact Matters of National Environmental Significance (MNES) - Ensures that development avoids or mitigates impacts on biodiversity,	An assessment of the Proposal against MNES listed under the EPBC Act has been undertaken as part of the Biodiversity Assessment (refer to Section 7.1 and Appendix D).

Legislation / Policy	Relevant Objectives & Actions	Proposal Alignment
	- particularly on listed species or ecological communities - To protect threatened species and ecological communities - To promote ecologically sustainable development - To enhance Australia's capacity to address environmental challenges.	- The Proposal has been intentionally designed and sited to avoid and minimise impacts on flora and fauna, including MNES. - No significant impacts to MNES are expected, and a referral under the EPBC Act is not required.
State		
Climate Change Act 2017	To set a long-term greenhouse gas emissions reduction target.	The Proposal will directly contribute to the State's stated greenhouse gas emissions reduction targets by supporting the production and dispersion of renewably generated electricity.
Renewable Energy (Jobs and Investment) Act 2017 & Victorian Renewable Energy Target (VRET)	- To increase the proportion of Victoria's electricity generated by the means of large-scale facilities that utilise renewable energy sources - To contribute to achieving the renewable energy targets, and energy storage targets - To support the development of projects and initiatives to encourage investment, employment, and technology development in Victoria in relation to renewable electricity generation, and energy storage - To contribute to the reduction of greenhouse gas emissions in Victoria and to achieve associated environmental and social benefits - To promote the transition of Victoria to a clean energy economy - To contribute to the security of the electricity supply in Victoria.	- The proposed BESS will be key to achieving Victoria's ambitious energy storage targets of at least 2.6 GW by 2030. - The battery storage capacity of the Proposal supports the Victorian Government's goals of providing reliable, affordable, and clean energy. - The Proposal will also contribute to Victoria's renewable energy targets by allowing more renewable energy generators to connect to the grid.
Victoria's Climate Change Strategy 2026-30	- Build a balance of renewable generation and storage infrastructure to keep the state's electricity system stable and sustainable as the state transitions to renewable energy - Invest in Victoria's electricity sector, including building large-scale energy storage to support renewables - Reduce greenhouse gas emissions levels by 28-33% from 2005 levels by 2025 and 45-50% by 2030.	- The Proposal aligns with the State's transition to a renewable energy future and delivers the State's objectives to build more battery infrastructure to provide critical storage and facilitating the distribution of electricity generated from nearby renewable sources. - The Proposal will contribute to the State's emissions reduction targets by allowing a greater mix of renewable energy in the electricity grid and storing energy that would otherwise be generated through fossil fuel sources. - The Proposal will utilise the latest LFP cell battery technology, which is constantly adapting and innovating to meet best practice standards.
Environment Effects Act 1978	- If a project is expected to have significant environmental effects, an Environment Effects Statement may be required to be prepared and submitted to the Minister for assessment of the environmental effects of the works - If a project is determined to be public works, the proponent must cause an Environmental Effects Statement to be prepared and submitted to the Minister for assessment of the environmental effects of the works.	- An assessment of the Proposal against ecological values has been undertaken as part of the Biodiversity Assessment (refer to Section 7.1 and Appendix D). - No significant impact on ecological values is expected, and an Environmental Effects Statement is not warranted.
Planning and Environment Act 1987 (P&E Act)	- To establish a framework for planning the use, development, and protection of land in Victoria - Provides legal weight to instruments under the P&E Act, including the Victoria Planning Provisions, planning	- The Proposal is in accordance with the general objectives for planning and land use within Victoria - It has been selected for its strategic location, in proximity to existing electrical infrastructure and renewable energy facilities

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Legislation / Policy	Relevant Objectives & Actions	Proposal Alignment
	schemes (such as the Gannawarra Planning Scheme), regulations, and Ministerial directions.	Planning approval from the Minister for Planning is being sought as part of this application. A detailed assessment against the relevant provisions of the Gannawarra Planning Scheme has been provided in Section 6.
Aboriginal Heritage Act 2006	- To recognise, protect and conserve Aboriginal cultural heritage in Victoria in ways that are based on respect for Aboriginal knowledge and cultural and traditional practices - To promote the management of Aboriginal cultural heritage as an integral part of land and natural resource management.	- The Proposal is located on the traditional land of the Barapa Barapa, Yorta Yorta, and Wamba Wamba peoples. - There is no RAP for the land on which the Proposal is located. The Proponent has sought to engage with nearby RAPs, including the Wamba Wamba Aboriginal Corporation and Barapa Barapa Aboriginal Corporation, and Wiran Aboriginal Corporation. The Proponent has also engaged with First Peoples State Relations and Aboriginal Affairs Victoria. - A Voluntary CHMP is being prepared for the Proposal (Section 7.2 and Appendix E)
Heritage Act 2017	- To protect and conserve the cultural heritage of the State - To create offences and other enforcement measures to protect and conserve cultural heritage.	The Proposal is generally consistent with the objectives of the Act, as it would not disturb any places of European heritage.
Environment Protection Act 2017 (EP Act)	- Provides the Environment Protection Authority (EPA) powers and tools to prevent and minimise the risks of harm to human health and the environment from pollution and waste - Provides the EPA with the ability to pursue stronger sanctions and penalties to hold environmental offenders to account.	The Proposal is consistent with the purposes of the EP Act.
Flora and Fauna Guarantee Act 1988 (FFG Act)	- To prevent taxa and communities of flora and fauna from becoming threatened and to recover threatened taxa and communities so their conservation status improves. - To identify and mitigate the impacts of potentially threatening processes to address the important underlying causes of biodiversity decline.	- The Proposal is consistent with the purposes of the FFG Act in that it does not impact threatened species or communities. - The Planning Application is accompanied by a Biodiversity Assessment (refer to Section 7.1 and Appendix D) which addresses the requirements in the FFG Act.
Road Management Act 2004	To establish a system for the management of safe and efficient public roads that best meet the needs and priorities of State and local communities.	The planning application is accompanied by a Transport Impact Assessment (refer to Section 7.3 and Appendix F), which outlines the proposed strategies for road management. The proposal is consistent with the road management principles outlined in the <i>Road Management Act 2004</i>.
Water Act 1989	- To provide for the integrated management of waterways in Victoria - To promote the orderly, equitable and efficient use of water resources in Victoria.	- The planning application is accompanied by a Hydrology Assessment (refer to Section 7.7 and Appendix J), which outlines how the Proposal will interact with water resources. - The Project Site is not adjacent to any existing waterways.
Dangerous Goods Act 1985	- To promote the safety of persons and property concerning the manufacture, storage, transport, transfer, sale, and use of dangerous goods. - To ensure that adequate protections are taken against certain fires, explosions, leakages, and spillages of dangerous goods. - To ensure that information relating to dangerous goods is provided by occupiers and owners of premises to the relevant authorities. - To allocate responsibilities to occupiers and owners of premises to ensure that the health and safety of workers and the general public is protected.	- The planning application is accompanied by a Risk Management Plan (including Fire Safety Study) (refer to Section 7.6 and Appendix I), which assesses the hazard associated with the Proposal. - The Proponent has extensive experience in the development of grid-scale battery storage systems that commonly utilise LFP cell technology, and are familiar with the associated dangerous goods and hazards handling processes in the respective states and territories they have worked in. - Elements of the Proposal classified as Dangerous Goods will be listed within the site's Dangerous Goods register. Maintenance programs will be enacted to ensure all

Legislation / Policy	Relevant Objectives & Actions	Proposal Alignment
		elements containing Dangerous Goods will be maintained in accordance with manufacturer specifications and relevant Australian Standards.
Design Guidelines and Model Requirements: Renewable Energy Facilities 2023	- Provides standard considerations and measures about fire safety, risk, and emergency management to be considered when designing and operating new renewable energy facilities. - Provides design guidelines for battery facilities in bushfire-prone areas.	- The planning application is accompanied by a Risk Management Plan (including Fire Safety Study) (refer to Section 7.6 and Appendix I), which assesses the Proposal against the guidelines. - The CFA will be consulted during the design, construction, and operation phases.
Regional		
Loddon Mallee North Regional Growth Plan 2014	- Provides an integrated planning framework to direct and manage sustainable growth across the region. - Acknowledges that the region is renowned for renewable energy production and innovation. - Acknowledges that opportunities for economic development and diversification arise from increasing viability of renewable and alternative energy. - Outlines strategies and actions to support renewable energy development and generation.	The Proposal is aligned with the region's renewable energy production and supports emerging economic development opportunities. ADVERTISED PLAN
Mallee Regional Economic Development Strategy 2022	- Provides strategic direction for the Mallee Regional to drive economic growth and development. - Acknowledges that natural endowments and energy infrastructure support renewable energy generation in the region. - Identifies that strengthening renewable energy capabilities is a key strategic direction for the region.	The Proposal supports the Mallee Region's key economic development strategic priorities.
Loddon Mallee Climate Ready Plan	- Provides strategic direction and action for regional climate change adaptation. - Identifies renewable energy is a key sector that contributes to climate change mitigation, as well as economic growth in the region.	- The Proposal supports the continued growth and development of the region's renewable energy sector and is aligned with the plan's climate change adaptation strategies. - The Proposal will contribute to providing a secure and reliable renewable energy supply.
Loddon Mallee Renewable Energy Roadmap	- Outlines the region's vision for a renewable energy future, and opportunities for investment in the region - Acknowledges battery storage technology is an emerging technology that will help manage grid stability, enabling load and generation flexibility - Acknowledges the importance of battery storage for managing solar generation and peak demand. - States that identifying strategic locations in the transmission and distribution grid where batteries can help stabilise energy supply and shift electricity generation to peak periods	- The Proposal supports the Roadmap's vision and strategic priorities by delivering energy infrastructure to support the region's renewable energy transition. - The Proposal also contributes to a secure and reliable energy supply in the region.
North Central Regional Catchment Strategy (RCS)	- Provides a vision and overarching strategy for the management of land, water, and biodiversity within the North Central Catchment Management Authority's catchment area - Acknowledges that the Irrigated Riverine area (the local area in the North Central Regional Catchment area in which the site is located) is mostly agricultural and rural landholders play a critical role in managing natural resources	- The Proposal supports the priority directions and outcomes of the North Central RCS. - The Proposal has been designed and sited to ensure that flood irrigation of the farmed paddocks can be isolated from the BESS Area. - The Proposal is also committed to ensuring the protection of local biodiversity, including through the minimising impact to native vegetation and procuring offsets for the removal of native vegetation where required.

Legislation / Policy	Relevant Objectives & Actions	Proposal Alignment
	- Identifies that changes to more intensive land use have potentially adverse environmental impacts (e.g. loss of biodiversity, effluent run-off). The strategy also recognises that renewable energy development presents opportunities to contribute to local biodiversity and RCS outcomes - Relevant priority directions and outcomes for the Irrigated Riverine area include improved management of irrigation and drainage systems, considering efficiency of water use and opportunities for ecological connectivity, by 2041.	
Local		
<i>Council Plan 2025-2029</i>	- Provides a strategic direction for the region's mid to long-term economic and urban growth and development - Acknowledges that the region is an emerging hub for renewable energy infrastructure (including solar and battery projects) - A key objective for the plan is a thriving and diverse economy that includes renewable energy.	The Proposal will contribute to Gannawarra's renewable energy generation capabilities and support key economic development objectives.
<i>Economic Development Strategy 2019-2024</i>	- Outlines a vision and strategies and actions towards economic development across the Shire to 2024. - Acknowledges that its agriculture sector is the pillar of its economic base. - The strategy recognises that renewable energy is a growth sector and that there is an opportunity to continue to leverage renewable energy developments to support investment, employment, rate revenue, and business potential. - Recognises that the area is well suited to renewable energy infrastructure, including solar and battery technology.	- The Proposal is located in proximity to the existing and future energy infrastructure, thereby reducing fragmentation of agricultural land. - The Proposal is not proposed on land with high agricultural capability (refer to Section 7.8 and Appendix K). - The Proposal is consistent with the strategic direction to grow the region's emerging industry and renewable energy sector.
<i>Climate Change Adaption and Mitigation Strategy</i>	- Provides strategic direction and objectives for climate change adaptation and mitigation in the region, and details action plans to achieve Council's climate vision. - Acknowledges that facilitating large-scale renewable energy projects is a key pathway action to achieve its strategic priority to maximise the opportunities of the low carbon transition.	The Proposal supports Council's strategic priorities and is directly aligned with Council's objective to facilitate the development of new large-scale renewable energy projects.

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6. Planning Assessment

This section outlines the relevant provisions of the Planning Scheme and, where appropriate, provides assessment directly against them.

6.1 Planning permit triggers

The Planning Scheme outlines a range of State, Regional and local policies, along with detailed planning provisions, that direct use and development, including the land on which the Proposal is located.

Table 9 identifies the planning permit triggers under the Planning Scheme that apply to the Proposal.

Table 9 – Planning permit triggers

Clause	Permit requirement
Clause 35.07-1 Farming Zone	Use of land for a Utility installation (BESS)
Clause 35.07-7 Farming Zone	To construct a building or carry out works associated with a Section 2 use (i.e. Utility installation)
Clause 35.07-4 (Schedule) Farming Zone	Buildings within the minimum setback (100m) from a road in the Transport Zone 2
Clause 35.07-4 (Schedule) Farming Zone	Earthworks which change the rate of flow or the discharge point of water across a property boundary, or which increase the discharge of saline groundwater
Clause 36.04-1 Transport Zone	Use of land for a Utility installation (BESS)
Clause 36.04-2 Transport Zone	Construct a building or construct or carry out works for a Section 2 use (i.e. Utility installation)
Clause 42.01-2 Environmental Significance Overlay – Schedule 2	Building and works
Clause 52.05-14 Signs	Development of a business identification sign
Clause 52.06-6 Car parking	Provide car parking to the satisfaction of the Responsible Authority
Clause 52.17-1 Native vegetation	To remove, destroy or lop native vegetation, including dead native vegetation
Clause 52.29-2 Land adjacent to the Principal Road Network	To create or alter access to a road in a Transport Zone 2 (TRZ2) (Principal Road Network)

6.2 Municipal Planning Strategy

The Municipal Planning Strategy (MPS) is provided at Clause 02 of the Planning Scheme and provides the context, vision, and strategic directions of Gannawarra Shire Council. Relevant Clauses include:

- Clause 02.01 – Context – This clause provides an overview of the current social, economic, and environmental context of the municipality
- Clause 02.02 – Vision – This clause sets out the vision for the municipality in line with the Council Plan
- Clause 02.03 – Strategic Directions – This clause provides the strategic direction for the municipality in line with strategic framework plans at Clause 02.04.

Table 10 sets out the strategic direction sub-clauses and provisions relevant to the Proposal and an assessment against them.

Table 10 – Relevant Strategic Directions and Assessment

Sub-clause	Relevant Provision	Assessment
Clause 02.03-3 Environmental risks and amenity	- Planning for environmental risks seeks to plan for the likelihood of additional extreme weather events, including droughts, fire, flood, and storms - Planning for flooding seeks to minimise the potential for damage and risks to public safety from flooding.	- The Proposal has been considerate to the <i>Design Guidelines and Model Requirements: Renewable Energy Facilities</i> (CFA, 2024) and is supported by a Risk Management Plan (including Fire Safety Study) (refer to Section 7.6 and Appendix I). - The Proposal has been designed and sited to minimise the impacts of flooding, in particular at the BESS Development Area. The Proposal is supported by a Hydrology Impact Assessment and Stormwater Management Strategy (refer to Section 7.7 and Appendix J).
Clause 02.03-4 Natural resource management	- Planning for agriculture seeks to protect the agricultural base for the municipality and discourage the fragmentation of productive agricultural land. - Planning for water management seeks to manage floodwaters, stormwater runoff, effluent and waste materials.	- The Proposal has been sited in proximity to the existing and future energy infrastructure in the Gannawarra Shire region, reducing fragmentation of agricultural land. - The Proposal is not proposed on land with high agricultural capability (refer to Section 7.8 and Appendix K). - As above, the Proposal is supported by a Stormwater Management Strategy (refer to Appendix J).
Clause 02.03-9 Infrastructure	Planning for infrastructure seeks to encourage the use and development of land for solar energy production.	- The Proposal complements the region's strategic direction to promote solar energy infrastructure development. - It also supports the region's transition to renewable energy, reduces dependence on energy outside the municipality, and contributes to a reduction in greenhouse emissions.

6.3 Planning Policy Framework

The Planning Policy Framework (PPF) sets out the State, regional and local objectives and strategies that guide land use and development within the municipality.

Table 11 sets out the relevant PPF clause objectives and strategies and provides an assessment against them.

Table 11 – Relevant PPF Objectives, Strategic Directions and Assessment

Clause	Objectives and Strategies	Assessment
Clause 12 – Environmental and Landscape Values		
Clause 12.01-1S Protection of biodiversity	- Ensure that decision making takes into account the impacts of land use and development on Victoria's biodiversity, including consideration of: - Cumulative impacts - Fragmentation of habitat - The spread of pest plants, animals, and pathogens into natural ecosystems. - Avoid impacts of land use and development on important areas of biodiversity.	- The Proposal has been intentionally located on a site that is used for agricultural purposes and largely void of significant ecological values. - The development of the transmission line (within the Transmission Development Area) will require the removal of one small patch of native vegetation. Native vegetation impacts have been minimised as far as practicable and the transmission corridor selected avoids extensive patches of native vegetation. - A Biodiversity Assessment has been prepared (refer to section 7.1 and Appendix D) to inform the design development and assessment of the Proposal with consideration of ecological values.
Clause 12.01-1L Flora and fauna protection	Restrict uses in native grassland areas to grazing and other farming that is compatible with their preservation and maintenance	
Clause 12.01-2S Native vegetation management	Ensure that there is no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation.	

Clause	Objectives and Strategies	Assessment
Clause 13 – Environmental risks and amenity		
Clause 13.01-1S Natural hazards and climate change	- Respond to the risks associated with climate change in planning and management decision making processes. - Develop adaptation response strategies for existing settlements in risk areas to accommodate change over time. - Site and design development to minimise risk to life, health, property, the natural environment, and community infrastructure from natural hazards.	- The Proposal will provide a flexible and reliable energy storage solution that can readily respond to fluctuating energy demands and renewable energy generation. By storing excess energy during periods of low demand and releasing it during peak demand periods, the Proposal would help to mitigate the impacts of extreme weather events on the electrical grid and enhance energy resilience. - By decentralising energy storage and reducing dependence on centralised power plants, the Proposal would allow for more flexible and sustainable growth patterns, particularly in areas more vulnerable to climate-related hazards. - The Proposal is sited and designed according to rigorous standards to minimise risk to life and the environment.
Clause 13.02-1S Bushfire planning	- Identify bushfire hazard and undertake appropriate risk assessment by applying the best available science to identify vegetation, topographic and climatic conditions that create a bushfire hazard - Consulting with emergency management agencies and the relevant fire authority early in the process to receive their recommendations and implement appropriate bushfire protection measures	- The Proposal has been designed in accordance with the <i>Country Fire Authority's Design Guidelines Model Requirements Renewable Energy Facilities</i> (August 2025) and includes mandatory bushfire safety design elements such as perimeter fire breaks, access roads for emergency vehicles, adequate water access and an associated fire protection and suppression system. - Consultation has been undertaken with the CFA by Fire Risk Consultants inform the Proposal's design and fire risk mitigation equipment and infrastructure - A Risk Management Plan (including Fire Safety Study) (Section 7.6 and Appendix I) has been prepared and informed the design of the Proposal and fire mitigation measures.
Clause 13.03-1S Floodplain Management	- Avoid intensifying the impact of flooding through inappropriately located use and development. - Ensure that land use on floodplains minimises the risk of waterway contamination occupying during floods and floodplains are able to function as temporary storage to moderate peak flows and downstream impacts.	- The Proposal is located in the Loddon River floodplain. The Proposal has been sited and designed to minimise risk of flooding and waterway contamination. - A Hydrology Impact Assessment and Stormwater Management Strategy (Section 7.7 and Appendix J) has been prepared and informed the design of the Proposal and flood mitigation measures.
Clause 13.05 Noise management	Ensure that development is not prejudiced and community amenity and human health is not adversely impacted by noise emissions.	- The Proposal is considered a noise-emitting development and has been adequately separated from sensitive land uses. - A Noise Impact Assessment (Section 7.5 and Appendix H) has been prepared and informed the layout of the Proposal and requirements of any noise mitigation measures.
Clause 13.07-1S Land use compatibility	- Ensure that use or development of land is compatible with adjoining and nearby land uses - Avoid or otherwise minimise adverse off-site impacts from commercial, industrial, and other uses	The Proposal has been located on land that is in proximity to renewable energy infrastructure and transmission infrastructure and

Clause	Objectives and Strategies	Assessment
	through land use separation, siting, building design and operational measures.	is therefore compatible with nearby land uses. The Proposal has been sited and designed to minimise adverse off-site impacts and meet relevant noise limits by ensuring appropriate separation distances and mitigation measures (Section 7.5 and Appendix H)
Clause 14 – Natural Resource Management		
Clause 14.01-1S – Protection of agricultural land	- Avoid permanent removal of productive agricultural land from the state's agricultural base without consideration of the economic importance of the land for the agricultural production and processing sectors. - Protect productive agricultural land from unplanned loss due to permanent change in land use. ADVERTISED PLAN	- The Proposal comprises the use of agricultural land (FZ). The BESS Development Area is currently used for sheep grazing and the production of fodder. - An Agriculture Assessment (Appendix K) has been prepared and confirms that, while the Proposal will alter the agricultural use of the BESS Development Area, the BESS Development Area is not otherwise high-quality agricultural land (see also Section 7.8). - The Proposal is also not expected to have any adverse impact on surrounding farms or agricultural activity. - Once the BESS ceases operations, the Proponent is required to return the site to its pre-lease condition, specifically for farmland purposes, avoiding the permanent removal of productive agricultural land.
Clause 14.01-1L Protection of agricultural land – Gannawarra	Encourage the consolidation of agricultural land into larger parcels and discourage the fragmentation of agricultural land.	The Proposal is strategically located in proximity to other renewable energy projects and energy infrastructure. This reduces the fragmentation of productive agricultural land.
Clause 14.02-2S Water quality	Ensure that land use activities potentially discharging contaminated runoff or wastes to waterways are sited and managed to minimise such discharges and to protect the quality of surface water and groundwater resources, rivers, streams, wetlands, estuaries, and marine environments.	- The Proposal includes detention basins to ensure that there is no increase in the rate or volume of water runoff leaving the site and impacting groundwater resources. In the event of contaminated water, the water can be held in the detention basins for proper management. - See Section 7.7 and Appendix J for further details.
Clause 15 – Built Environment and Heritage		
Clause 15.01-6S Design for rural areas	- Ensure that the siting, scale, and appearance of development protect and enhances rural character - Protect the visual amenity of valued rural landscapes and character areas along township approaches and sensitive tourist routes by ensuring new development is sympathetically located - Site and design development to minimise visual impacts on surrounding natural scenery and landscape features including ridgelines, hill tops, waterways, lakes, and wetlands.	- The Proposal is located in proximity to existing and future energy generation and transmission infrastructure, which already represent significant non-natural elements in the landscape. - The Landscape and Visual Impact Assessment (refer to Section 7.4 and Appendix G) has been prepared to further assess this impact and inform mitigation measures. The Assessment confirms that, to the extent the Proposal is consistent with existing energy infrastructure, it will not materially change the existing landscape character or adversely affect visual impacts.

Clause	Objectives and Strategies	Assessment
Clause 15.03-2S Aboriginal cultural heritage	- Provide for the protection and conservation of pre-contact and post-contact Aboriginal cultural heritage places - Ensure that permit approvals align with the recommendations of the relevant CHMP approved under the <i>Aboriginal Heritage Act 2006</i>.	- A Cultural Heritage Due Diligence Assessment has been prepared for the Proposal. The assessment identified a total of 77 Aboriginal sites within a 3 km radius of the study area (noting that this extends beyond the Project Site) - Two areas of Aboriginal Heritage Sensitivity intersect with the study area, positioned along the initial transmission line corridor (refer to Section 3.11.2) - The report identifies that the study area exhibits varying degrees of land disturbances. However, the report concludes that <i>significant ground disturbance</i> (Regulation 4, <i>Aboriginal Heritage Regulations 2018</i> (Regulations)) cannot be confirmed across the entire study area (including in the areas of Aboriginal cultural heritage sensitivity). - Pursuant to the Regulations, a CHMP does not need to be prepared for a high impact activity (which includes 'utility installation') if all the area of cultural heritage sensitivity within the activity area has been subject to significant ground disturbance. - While the Project Site has no identified areas of Aboriginal cultural heritage sensitivity, the Proponent prepared a Voluntary CHMP for the Proposal, which was approved on the 30 December 2025, to inform the detailed design stage of the Proposal and ensure that places of Aboriginal cultural heritage significance are avoided and protected. The Cultural Heritage Due Diligence Assessment informed the development of the CHMP. - See Section 7.2 and Appendix E for further details.
Clause 17 – Economic Development		
Clause 17.01-1S Diversified economy	- Protect and strengthen existing and planned employment areas and plan for new employment areas - Facilitate growth in a range of employment sectors based on the emerging and existing strengths of each region - Support rural economies to grow and diversify.	The Proposal would help to facilitate growth in a new and innovative employment sector, thereby supporting the region's economy to grow and diversify.
Clause 17.01-1R Diversified economy – Loddon Mallee North	Support emerging and potential growth sectors, such as nature-based tourism, mining and renewable energy generation and protect these activities from urban encroachment.	The Proposal supports the region's priority emerging economic sectors, specifically growth in the renewable energy generation sector.
Clause 19 - Infrastructure		
Clause 19.01-1S Energy supply	- Support the development of energy generation, storage, transmission, and distribution infrastructure to transition to a low-carbon economy - Develop appropriate infrastructure to meet community demand for energy services - Ensure energy generation, storage, transmission and distribution infrastructure and projects are resilient to the impacts of climate change	- The Proposal is directly aligned with the objectives and strategies of the PPF for infrastructure. This includes by providing storage to assist in the transition to a low carbon economy. - The Proposal would facilitate energy infrastructure development

Clause	Objectives and Strategies	Assessment
	- Support energy infrastructure projects in locations that minimise land use conflicts, including in any renewable energy zones declared under section 63 of the <i>National Electricity (Victoria) Act 2005</i> - Support energy infrastructure projects in locations that take advantage of existing and planned resources and infrastructure networks - Facilitate energy infrastructure projects that help diversify local economies and improve sustainability and social outcomes. - Facilitate renewable energy generation and storage to meet on-site energy needs.	in an appropriate location and take advantage of existing infrastructure. The Proposal would provide benefits to industry and the community, support the transition to a low-carbon economy with renewable energy and greenhouse emission reductions and help diversify the local economy and improve sustainability and social outcomes.
Clause 19.01-2S Renewable energy	- Facilitate renewable energy development in appropriate locations, including any renewable energy zones declared under section 63 of the <i>National Electricity (Victoria) Act 2005</i> - Consider the economic, social, and environmental benefits to the broader community of renewable energy generation while also considering the need to minimise the effects of a proposal on the local community and environment.	ADVERTISED PLAN
Clause 19.01-2R Renewable energy – Loddon Mallee North	Support and facilitate renewable energy generation and protect these activities from urban encroachment.	

6.4 Zones and Overlays

6.4.1 Clause 35.07 Farming Zone (FZ)

The Project Site is located in the Farming Zone (FZ) and subject to a Schedule to the zone.

The purpose of the FZ is:

- To provide for the use of land for agriculture
- To encourage the retention of productive agricultural land
- To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture
- To encourage the retention of employment and population to support rural communities
- To encourage use and development of land based on comprehensive and sustainable land management practices and infrastructure provision
- To provide for the use and development of land for the specific purposes identified in a schedule to this zone.

Clause 73.03 (Land Use Terms) of the Planning Scheme defines 'Utility installation' as 'land used to transmit, distribute or store power.' As a result, the most appropriate land use term for the Proposal is 'utility installation.'

Permit triggers in the FZ applying to the Proposal are:

- Pursuant to Clause 35.07-1 (Table of uses), 'utility installation' is a Section 2 – Permit required use.
- Pursuant to Clause 35.07-4 (Buildings and works), a permit is required to construct or carry out buildings or works associated with a Section 2 use.
- Pursuant to the Schedule to Clause 35.07-4, a permit is required for buildings within the minimum setback (100m) from a road in the Transport Zone 2.
- Pursuant to Schedule to Clause 35.07-4, a permit is required for earthworks which change the rate of flow or the discharge point of water across a property boundary, or which increase the discharge of saline groundwater.

Clause 35.07-6 (Decision guidelines) sets out the guidelines for the Responsible Authority to consider before deciding on an application. Table 12 provides an assessment against the relevant decision guidelines in FZ.

Table 12 – Farming Zone Decision Guidelines and Assessment

Decision Guidelines	Assessment
General issues: ▪ The Municipal Planning Strategy and the Planning Policy Framework. ▪ Any Regional Catchment Strategy and associated plan applying to the land. ▪ The capability of the land to accommodate the proposed use or development, including the disposal of effluent. ▪ How the use or development relates to sustainable land management. ▪ Whether the site is suitable for the use or development and whether the proposal is compatible with adjoining and nearby land uses. ▪ How the use and development make use of existing infrastructure and services.	▪ The Proposal is aligned with relevant provisions of the MPS and PPF (see Table 10 and Table 11). ▪ The North Central Regional Catchment Strategy applies to the site. The Proposal is aligned with the priority directions and outcomes set out in the North Central RCS, including with regards to irrigation measures and contributing to local biodiversity and other RCS outcomes (Table 8). ▪ The Proposal is appropriately located on land that is capable of accommodating the proposed use of a 'Utility installation'. ▪ The site is particularly suitable for the proposed use, having regard to proximity to existing transmission infrastructure, co-location with renewable energy generation infrastructure and distance from sensitive receptors. The Proposal is compatible with nearby land uses.
Agricultural issues and the impacts from non-agricultural uses: ▪ Whether the use or development will support and enhance agricultural production. ▪ Whether the use or development will adversely affect soil quality or permanently remove land from agricultural production. ▪ The potential for the use or development to limit the operation and expansion of adjoining and nearby agricultural uses. ▪ The capacity of the site to sustain the agricultural use. ▪ The agricultural qualities of the land, such as soil quality, access to water and access to rural infrastructure. ▪ Any integrated land management plan prepared for the site.	▪ The Proposal would result in the net loss of approximately 12.3 Ha of agricultural land. Given the low agricultural potential of the land, and the relatively small footprint of development, the loss of the agricultural land is considered to be acceptable. ▪ The Proposal would not limit the productive operations of adjoining and nearby properties, including area within the Kerang Solar Plant that is intended to be used for sheep grazing activities.
Environmental issues ▪ The impact of the proposal on the natural physical features and resources of the area, in particular on soil and water quality. ▪ The impact of the use or development on the flora and fauna on the site and its surrounds.	▪ The Proposal avoids all areas of native vegetation to the extent possible. The Transmission Development Area and the transmission corridor have been selected to avoid extensive areas of native vegetation (refer to Section 3.11). ▪ The Proposal includes detention basins to ensure that there is no increase in the rate or volume of water runoff leaving the BESS Development Area and impacting groundwater resources. In the event of contaminated

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Decision Guidelines	Assessment
▪ The need to protect and enhance the biodiversity of the area, including the retention of vegetation and faunal habitat and the need to revegetate land including riparian buffers along waterways, gullies, ridgelines, property boundaries and saline discharge and recharge area. ▪ The location of on-site effluent disposal areas to minimise the impact of nutrient loads on waterways and native vegetation.	water, the water can be held in the detention basins for proper management. ▪ See Section 7.1 and Appendix D for further details.
Design and siting issues ▪ The need to locate buildings in one area to avoid any adverse impacts on surrounding agricultural uses and to minimise the loss of productive agricultural land. ▪ The impact of the siting, design, height, bulk, colours, and materials to be used, on the natural environment, major roads, vistas and water features and the measures to be undertaken to minimise any adverse impacts. ▪ The impact on the character and appearance of the area or features of architectural, historic, or scientific significance or of natural scenic beauty or importance. ▪ The location and design of existing and proposed infrastructure including roads, gas, water, drainage, telecommunications, and sewerage facilities. ▪ Whether the use and development will require traffic management measures.	▪ The Proposal has been designed and sited to occupy the smallest footprint, by occupying only one of the four paddocks within a larger landholding, thereby minimising the loss of agricultural land. ▪ By locating the Proposal on land in proximity to existing renewable energy infrastructure and transmission infrastructure, the BESS and ancillary infrastructure will not present a fragmentation of agricultural land or a significant change to the visual landscape. The BESS and associated infrastructure have also been designed to utilise materials and finishes that do not present a significant additional visual impact. ▪ Proposed vegetation screening and existing vegetation screening along the southern boundary of the BESS Development Area reduce the visual impact of the BESS on the surrounding area. See Section 7.4 and Appendix G for further details. ▪ Construction activities will require traffic management measures. See Appendix F and Section 7.3 for further details.

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6.4.2 Clause 36.04 Transport Zone 2 – Principal Road Network (TRZ2)

Part of the BESS Development Area and the Transmission Development Area that incorporate the Loddon Valley Highway are within the Transport Zone 2 – Principal Road Network (TRZ2).

The purpose of the Transport Zone is to:

- To provide for an integrated and sustainable transport system.
- To identify transport land use and land required for transport services and facilities.
- To provide for the use and development of land that complements, or is consistent with, the transport system or public land reservation.
- To ensure the efficient and safe use of transport infrastructure and land comprising the transport system.

Pursuant to Clause 36.04-1 (Table of uses), a Utility installation is a Section 1 use (Permit not required) if the use is carried out by or on behalf of a relevant transport manager. The Proposal is not being carried out by or on behalf of a relevant transport manager and therefore does not meet the condition. The Proposal is therefore a Section 2 use (Permit required).

Pursuant to Clause 36.04-2 (Permit requirement), a permit is required to construct a building or construct or carry out works for any use in Section 2.

Pursuant to Clause 36.04-3 (Application requirements), an application by a person other than a relevant transport manager on land shown on a planning scheme map as TRZ1 or TRZ2 must be accompanied by the written consent of the Head, Transport for Victoria (HTfV), indicating that the HTfV consents generally or

conditionally to either the application being made or the application being made and to the proposed use or development. The Proponent has obtained written consent of the HTfV (Appendix L).

Clause 36.04-5 (Decision guidelines) sets out the guidelines for the Responsible Authority to consider before deciding on an application. Table 13 provides an assessment against the relevant decision guidelines in TRZ.

Table 13 – Transport Zone Decision Guidelines and Assessment

Decision Guidelines	Assessment
▪ The Municipal Planning Strategy and the Planning Policy Framework ▪ The effect of the proposal on the development, operation, and safety of the transport system ▪ Whether the development is appropriately located and designed, including in accordance with any relevant use, design, or siting guidelines.	▪ To facilitate the construction of the underground transmission line and connection to the Kerang Terminal Station, works will be required within the Loddon Valley Highway road reserve. ▪ It was determined that the proposed transmission line works are expected to have only a minor and temporary impact on the arterial road network, with Loddon Valley Highway expected to remain open to through traffic throughout the process. ▪ Appropriate traffic management measures, such as temporary speed reductions and construction warning signage may be required to ensure safety for both workers and motorists. ▪ Pursuant to <i>Clause 36.04-3</i> of the Gannawarra Shire Council Planning Scheme, the Head, TfV consents to an application for a planning permit proposing the construction of a 220kv underground transmission line via horizontal direction drilling being made (refer to Consent Letter).

6.4.3 Clause 42.01 Environmental Significance Overlay (ESO)

The Project Site is covered by the Environmental Significance Overlay – Schedule 4 (ESO4). Part of the Transmission Development Area is also covered by the Environmental Significance Overlay – Schedule 2 (Highway Protection Environs). This applies to the part of the Transmission Development Area where the transmission line crosses the Loddon Valley Highway to connect to the Kerang Terminal Station.

The purpose of the Environmental Significance Overlay is:

- To identify areas where the development of land may be affected by environmental constraints
- To ensure that development is compatible with identified environmental values.

Pursuant to Clause 42.01-2 (Permit requirement), a permit is required to:

- construct a building or construct or carry out works (unless a schedule to Clause 42.01 specifically states that a permit is not required)
- remove, destroy, or lop any vegetation, including dead vegetation.

6.4.3.1 ESO4 – Areas of poor drainage or potentially subject to inundation

Schedule 4 to Clause 42.01 seeks to assist in the implementation of flood management studies. Section 2 to Schedule 4 (Environmental objective to be achieved) states that the ESO4 seeks to:

- identify land in urban and non-urban areas which is potentially liable to inundation by overland flow or sheet flooding and is likely to suffer from poor drainage which could inhibit development.
- ensure that any development maintains the free passage and temporary storage of floodwaters, minimises flood damage, is compatible with the flood hazard and with local drainage conditions and will not cause any significant rise in flood levels or flow velocity.

There are no permit exemptions in Section 4 to Schedule 4 (Permit requirement) that apply to the Proposal. Accordingly, Clause 42.01-2 applies such that a permit is required to construct a building or construct or carry out works in the Project Site which is covered by the ESO4.

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6.4.3.2 ESO2 – Highway Protection Environs

Schedule 2 to Clause 42.01 recognises that highways provide views of the open rural landscape that are a feature that defines the rural image of the municipality. Section 2 to Schedule 2 (Environmental objective to be achieved) states that the ESO2 seeks to:

- To maintain and enhance the safety and amenity of main roads.
- To preserve and enhance the tree lined character of the roadsides along the approaches to the towns and along main roads.
- To preserve and improve scenic views from land in a Transport Zone 2 or Transport Zone 3 and to preserve and enhance the visual character of the areas adjacent to a Transport Zone 2 or Transport Zone 3, both approaching and within the towns.
- To ensure that all existing trees and natural features which are within the overlay area are conserved within the limits of practicability and are not wantonly damaged, destroyed or removed.
- To require new buildings and their associated works, gardens, and landscape areas to be designed and maintained in a manner so as to harmonise with the visual character of their surrounds.
- To preserve the amenity and service capability of land in a Transport Zone 2 or a Transport Zone 3 and environs.

There are no permit exemptions in Section 3 to Schedule 4 (Permit requirement) that apply to the Proposal. The planned removal of native vegetation as part of this proposal is not located in areas designated under ESO2, therefore a permit is not required under Clause 42.01-2. However, a permit is required under Clause 42.01-2 for constructing a building or carrying out works in the area of the Transmission Development Corridor that falls under the ESO2 designation.

6.4.3.3 ESO Decision guidelines

Clause 42.04-5 (Decision guidelines), Section 5 to Schedule 4 (Decision guidelines) and Section 5 to Schedule 2 sets out the guidelines for the Responsible Authority to consider before deciding on an application. Table 14 provides an assessment against the relevant decision guidelines in ESO.

Table 14 – Environmental Significance Overlay Guidelines and Assessment

Decision Guidelines		Assessment
Clause 42.01 – Environmental Significance Overlay		
▪ The Municipal Planning Strategy and Planning Policy Framework. ▪ The statement of environmental significance and the environmental objective contained in a schedule to this overlay. ▪ The need to remove, destroy or lop vegetation to create a defensible space to reduce the risk of bushfire to life and property. ▪ Any other matters specified in a schedule to this overlay.		▪ The Proposal has been designed and sited to avoid significant impacts to the natural environment. ▪ The Proposal is unlikely to have any significant effect on any threatened flora, fauna, or ecological communities protected under the FFG Act or the EPBC Act ▪ Native vegetation will be removed as part of the Proposal. Two small patches of native vegetation (totalling 0.214 ha) are proposed to be removed to accommodate the transmission corridor. These patches are relatively isolated in the landscape and unlikely to provide habitat for local fauna species. ▪ Overall, the vegetation loss represents a very small proportion of the native vegetation recorded in the study area.
Schedule 4 to Clause 42.01		
▪ Any comments of the floodplain management authority		▪ Correspondence with the North Central CMA, the floodplain management authority, was undertaken as part of this Proposal. ▪ Information was provided regarding the groundwater levels of the Project Site. Based on the CMA advice, and Hydrology investigations, the infrastructure will need to be placed a minimum of 300mm above finished surface levels. ▪ The BESS Development Area will generally follow the natural ground level where practical. However, to mitigate flood risk, the substation and O&M areas will be constructed on an engineered raised earth platform approximately 1.3 m above the BESS area.

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Decision Guidelines	Assessment
Clause 42.01 – Environmental Significance Overlay	
	All electrical infrastructure within the BESS Unit area will be pile-mounted at a minimum height of 1.3 m above the platform level, with a 1.5 m wide O&M steel grating platform provided at the base of the equipment.
Schedule 2 to Clause 42.01	
- The responsible authority must give a notice of an application adjoining a Transport Zone 2 in accordance with section 52(1)(c) of the Act to the authority specified in Clause 66.06 or a schedule to that clause - The effect of any development on the safety and operation of the road - The prevention of ribbon development in the vicinity of the main road - The preservation of the amenity of the neighbourhood and the need to prevent unnecessary intrusive development in visually exposed areas - The need to retain a buffer strip of vegetation in the vicinity of roads and property boundaries, or in visually prominent areas of the site - The need to control the exterior colours and finishes of buildings, structures, and works that directly affect the visual quality of the area, and to encourage, where appropriate, such buildings, structures and works to respect the character and atmosphere of the surrounding town.	- Access to the Proposal is required from Loddon Valley Highway. Additional work will be necessary within the Loddon Valley Highway Road reserve to accommodate the underground transmission line connection to the Kerang Terminal Station. - The Proposal does not require any proposed road upgrades and will not negatively impact the safety or amenity of the Loddon Valley highway. - To ensure the safety of the Loddon Valley Highway during construction of the Proposal, a Construction Traffic Management Plan will outline appropriate mitigation measures. - No vegetation within the Loddon Valley highway road reserve is proposed for removal as part of the Proposal. Trees will be protected and retained along the site's boundary adjacent to the highway to help screen the Proposal. - Scenic views will be maintained due to the colocation of the Proposal to nearby electrical infrastructure and the existing Kerang Solar Plant. - Buildings associated with the Proposal are setback appropriately from the highway and will be screened using existing and additional vegetation.

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6.4.4 Clause 45.12 - Specific Controls Overlay (SCO2)

The Project Site is covered by the Specific Controls Overlay (SCO). The purpose of the SCO is to achieve a particular land use and development outcome in extraordinary circumstances.

Clause 45.12-1 (Use or development) provides that land affected by the SCO may be used or developed in accordance with a specific control contained in the incorporated document corresponding to the notation in the planning scheme map (and as specified in the schedule to the SCO). The incorporated document may:

- Allow the land to be used or developed in a manner that would otherwise be prohibited or restricted
- Prohibit or restrict the use or development of the land beyond the controls that may otherwise apply
- Exclude any other control in this scheme.

The Incorporated Document, 'Goulburn-Murray Water: Connections Project and Water Efficiency Project – Incorporated Document' specifies that the purpose of the SCO2 is to allow the use and development of the land for the purpose of irrigation modernisation works to be undertaken by or on behalf of the Goulburn-Murray Water Corporation (section 2).

Section 3 of the Incorporated Document states that the document applies to the use and development of land undertaken by or on behalf of Goulburn-Murray Water for the purposes of the Goulburn-Murray Water Connections Project and the Goulburn-Murray Water – Water Efficiency Project.

The Incorporated Document does not contain any provision that prohibits or limits the use and development of land subject to the SCO2 for the purpose of the Proposal. The SCO2, therefore, does not apply to the Proposal.

6.5 Particular Provisions

Particular provisions are planning controls that apply only to certain uses and development or to particular aspects of certain uses and development. The following Particular Provisions of the Gannawarra Planning Scheme are considered relevant to the Project. Their purposes, permit triggers, application requirements, referrals, and decision guidelines are considered in Table 15 below.

Table 15 – Particular Provisions

Particular Provision	Planning Permit Requirements	Assessment
Clause 52.05 Signs	A planning permit is required for the development of land for a business identification sign within Category 4 – sensitive areas (Clause 52.05-14). The total display area to each premises must not exceed three square metres.	- A small business identification sign is proposed to be placed at the entrance to the site. The sign would be no more than 3 sqm and would provide for appropriate identification of the facility and direction for workers and visitors. - The details of the sign will be finalised in detailed design.
Clause 52.06 Car Parking	Car parking must be required to the satisfaction of the responsible authority (Clause 52.06-6).	- Car parking for construction staff will be provided within a designated parking area within the BESS Development Area. Given the large area, all car parking demands during construction are expected to be comfortably accommodated on-site. - For the operational phase of the Proposal a smaller car parking area will be provided, with the design and provision of car parking to be finalised during detailed design.
Clause 52.17 Native Vegetation	A planning permit is required to remove, destroy or lop native vegetation, including dead native vegetation (Clause 52.17-1). An application to remove, destroy or lop native vegetation must comply with the application requirements specified in the <i>Guidelines for the removal, destruction or lopping of native vegetation</i> (Department of Environment, Land, Water and Planning, 2017).	- A Biodiversity Assessment has been undertaken which identifies where native vegetation is located within the site (Section 7.1). - Where possible, impacts on native vegetation have been avoided and minimised through careful planning and design of the Proposal. - However, two patches of native vegetation will need to be removed to allow for the construction of the underground transmission cable and the perimeter fencing of the BESS Development Area. - This will result in the removal of approximately 0.214 Ha of native vegetation.
Clause 52.29 Land Adjacent to the Principal Road Network	A planning permit is required to create or alter access to a road in a Transport Zone 2 (TRZ) (Clause 52.29-2).	- Access is proposed to be created to Loddon Valley Highway, on the western boundary of the BESS Development Area. The proposed access will facilitate fully directional vehicle movements into and out of the BESS Development Area. - As determined by the Transport Impact Assessment (Refer to Appendix F), the Proposal provides adequate sight distances from the access points along the site boundary. As such, the Proposal is not expected to have any material impact on the operation of the road or any impact on public safety.
Clause 53.22 Significant Economic Development	An application is exempt from the decision requirements of section 64(1), (2), and (3) and the review rights of section 82(1) of the P&E Act (Clause 53.22-4)	This application is made under Clause 53.22, exempting the application from the review rights set out in section 82(1) of the P&E Act.

6.6 General Provisions

The following general provisions of the Planning Scheme are considered relevant to the Proposal, among other more general provisions. Broadly, general provisions set out exemptions, decision guidelines, and referral and notice provisions.

Table 16 below summarises the relevant referral requirements for the Proposal.

Table 16 – Referral requirements

General Provision	Referral Requirements	Assessment
Clause 66.02-2 Native vegetation	The Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the <i>Conservation, Forests and Lands Act 1987</i>) is a recommending referral authority for an application to remove, destroy or lop native vegetation in the Detailed Assessment Pathway as defined in the <i>Guidelines for the removal, destruction or lopping of native vegetation</i> (Department of Energy, Environment and Climate Action, 2025).	This application will be referred to the Secretary of the Department of Energy, Environment and Climate Action (DEECA).
Clause 66.02-4 Major electricity line or easement	The electricity transmission authority is a determining referral authority for an application to construct a building or construct or carry out works on land within 60 metres of a major electricity transmission line (220 Kilovolts or more) or an electricity transmission easement.	This application will be referred to the electricity transmission authority. It is noted that the Proponent has and continues to consult with AusNet (the electricity transmission authority) in relation to the proposed connection to the Kerang Terminal Station.
Clause 66.02-7 Industry, utility installation, or warehouse	The Victorian WorkCover Authority is a determining referral authority to use land for a utility installation if the fire protection quantity is exceeded under the <i>Dangerous Goods (Storage and Handling) Regulation 2012</i> .	This application will be referred to the Victorian WorkCover Authority.
Clause 66.03 Referral of Permit Applications Under Other State Standard Provisions	The Head, Transport for Victoria is a determining referral authority for an application to create or alter access to a road declared as an arterial road.	This application will be referred to the Head, Transport for Victoria.
Section 1.0 of Schedule 1 to Clause 66.04 Referral of Permit Applications Under Local Provisions	The Secretary to the Department administering the <i>Minerals Resources (Sustainable Development) Act 1990</i> is a determining referral authority for an application within SUZ1.	This application will be referred to the Secretary to the Department administering the <i>Minerals Resources (Sustainable Development) Act 1990</i> .

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7. Technical Impact Assessment and Mitigation Measures

To inform the design and planning of this Proposal, a range of specialist technical assessments have been undertaken. These cover various topics and include contextual site assessments, describe potential impacts, and inform the design and measures required to avoid, minimise, or mitigate those impacts. The site context and characteristics relevant to each technical assessment, as well as proposed impact mitigation measures, are summarised in the following sections of this section. The full technical reports are attached as appendices to this report.

7.1 Flora and Fauna

A Biodiversity Assessment was prepared by Ecolink Consulting Pty Ltd. A copy of the assessment dated 4 December 2025 is provided at Appendix D. The assessment was undertaken to determine the ecological constraints of the site and inform the design development process.

The assessment found that the majority of vegetation within the broader Project Site consists of invasive grasses and environmental weeds, reflecting a long history of agricultural land use. Only isolated occurrences of indigenous native species were recorded, primarily along fencelines and within the proposed Transmission Corridor. Native vegetation present on the site was generally of low to moderate quality.

No threatened flora species or threatened ecological communities listed under the *Flora and Fauna Guarantee Act 1988* (FFG Act) were found to be present within the Project Site. An assessment of MNES listed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) was completed. No threatened flora species or threatened ecological communities under the EPBC Act were found to be present within the Project Site. The assessment identified several fauna EPBC-listed species as having potential to occur within the Project Site; however, these species are now considered unlikely to be present due to the absence or degradation of suitable habitat within the Project Site.

Targeted surveys determined there is a moderate likelihood that some bird species (such as the Australian Shoveller, Sharp-tailed Sandpiper, and Common Greenshank) may occasionally utilise or fly over the Project Site. However, the Proposal is not expected to result in significant impacts to these species. Additionally, Blackseed Glasswort, Bush Minuria, Spiny Lignum, and Samphire Skink were initially assessed as having a moderate likelihood of occurrence within the Project Site; however, targeted flora and fauna surveys did not locate these species. The proposed Transmission corridor avoids preferred habitat areas for Samphire Skink.

Ecolink completed targeted flora surveys along the road reserves, including the Loddon Valley Highway, and also confirmed that no protected flora species are present, and therefore a Permit to Take Protected Flora is not required, and the Proposal complies with the ESO2.

The main ecological values that will be impacted by the Proposal are native vegetation. Where possible, the Proposal has avoided and minimised impacts to native vegetation through careful siting and design. Two small patches of native vegetation (totalling 0.214 ha) are proposed to be removed to accommodate the transmission corridor. These patches are relatively isolated in the landscape and unlikely to provide habitat for Samphire Skink. Patch 1 will be removed to facilitate site access, security fencing, and to accommodate the planted visual screening. Patch 2, located along the eastern boundary and adjacent to the train line, cannot be avoided to accommodate components of the Proposal. Overall, the vegetation loss represents a very small proportion of the native vegetation recorded in the study area.

The design of the proposal has focused on avoiding and minimising ecological impacts by placing infrastructure away from areas with higher-quality vegetation. The main ecological impact is the removal of some native vegetation, which has been kept to a minimum through careful planning and siting of the infrastructure. In conclusion, the assessment determined that the proposed works are unlikely to significantly affect any threatened flora, fauna, or ecological communities protected under the FFG Act or the EPBC Act.

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Impact Mitigation

The Biodiversity Assessment recommends a number of avoidance and minimisation strategies, including:

- The Proposal must be considerate of the native vegetation recorded on site, and all infrastructure (including roads and infrastructure) must be sited away from the highest quality native vegetation where possible.
- Retain trees within the BESS development area, where possible, to address the objectives of the ESO2.
- Any retained trees, inclusive of their Tree Protection Zone, should be avoided wherever safe and practicable in accordance with the Tree Protection Zone as per the Australian Standards for the Protection of Trees on Development Sites (Standards Australia 2009); and
- Native vegetation, which is to be retained, is protected from construction activities, in accordance with a Construction Environment Management Plan.

7.2 Aboriginal Cultural Heritage

A Voluntary CHMP has been prepared by GML Heritage Victoria Pty Ltd (GML Heritage) to support the development of the Proposal. The Voluntary CHMP was approved by FPSR on 30 December 2025. A copy of the Desktop Cultural Heritage Assessment dated 27 October 2025 is provided at Appendix E. This has been prepared to support the development of the Voluntary CHMP and this Planning Application.

Despite a transmission line route being chosen, the Desktop Cultural Heritage Assessment evaluates the opportunities and constraints related to both transmission line route options that were originally explored, as well as the potential risks to Aboriginal cultural heritage.

Within their assessment, GML defined a 'study area' which comprised the overall 23 Ha rural landholding where the Proposal would be located, plus additional land within the adjacent Kerang Solar Plant and part of the Loddon Valley Highway road reserve to explore any potential cultural heritage sensitivity for two transmission connection options – the green cable route and the orange cable route. Refer to Figure 27.

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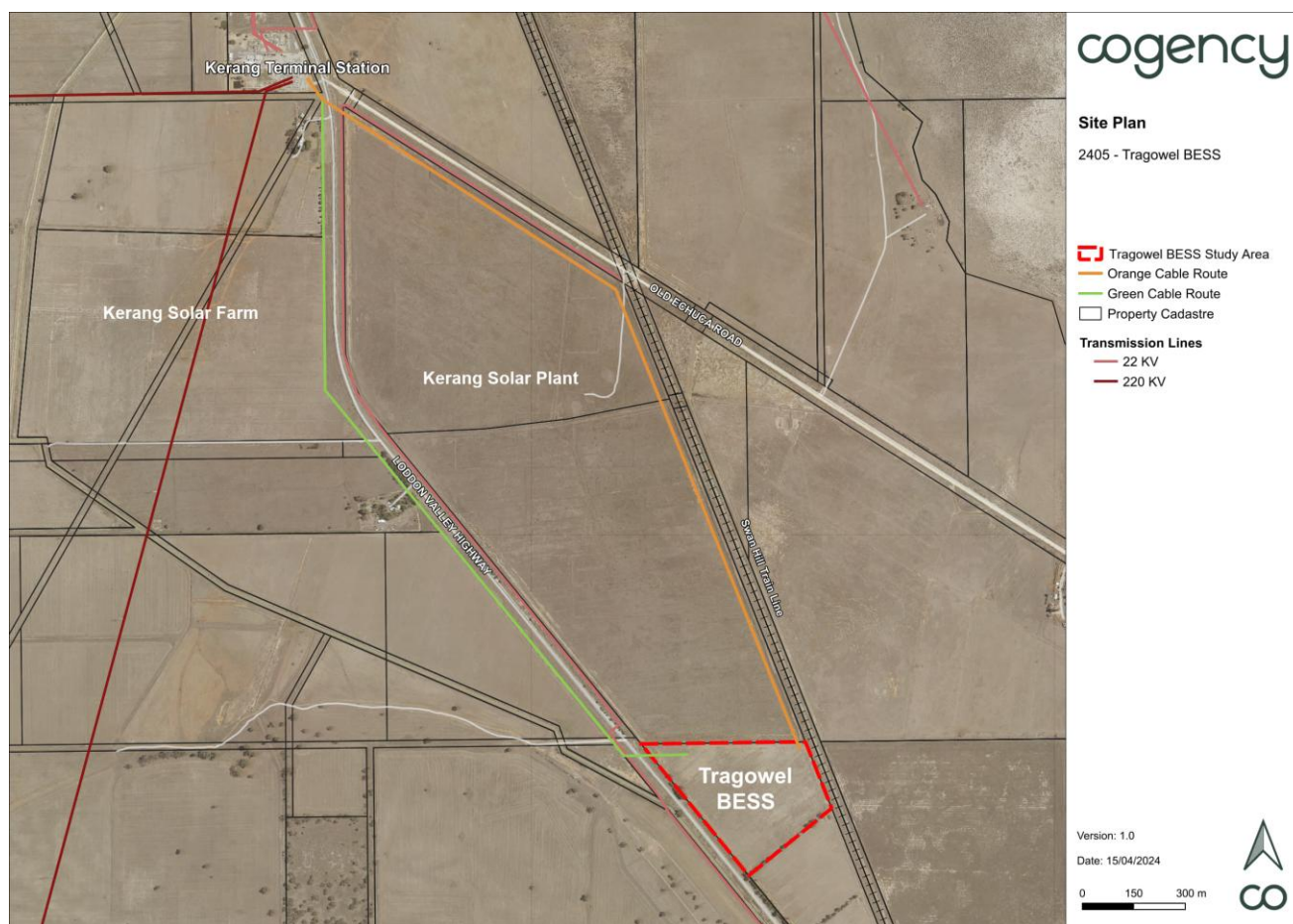


Figure 27 – GML Study Area Plan

The report identified a total of 77 Aboriginal sites with 85 components registered within a 3 km radius of GML's study area. These sites are primarily recorded as scarred trees and earth features, such as mounds. Most of these Aboriginal sites are located along the perimeter of Tragowel Swamp or in association with elevated sandy lunette landforms, with stone artifacts predominantly made from quartz.

The report also highlights two areas of Aboriginal Cultural Heritage Sensitivity that intersect within the green cable route area, positioned along the Loddon Valley Highway (refer to Figure 28). Based on previous archaeological assessments, these areas were identified as lunette landforms. However, further complex testing determined that these features were not present.

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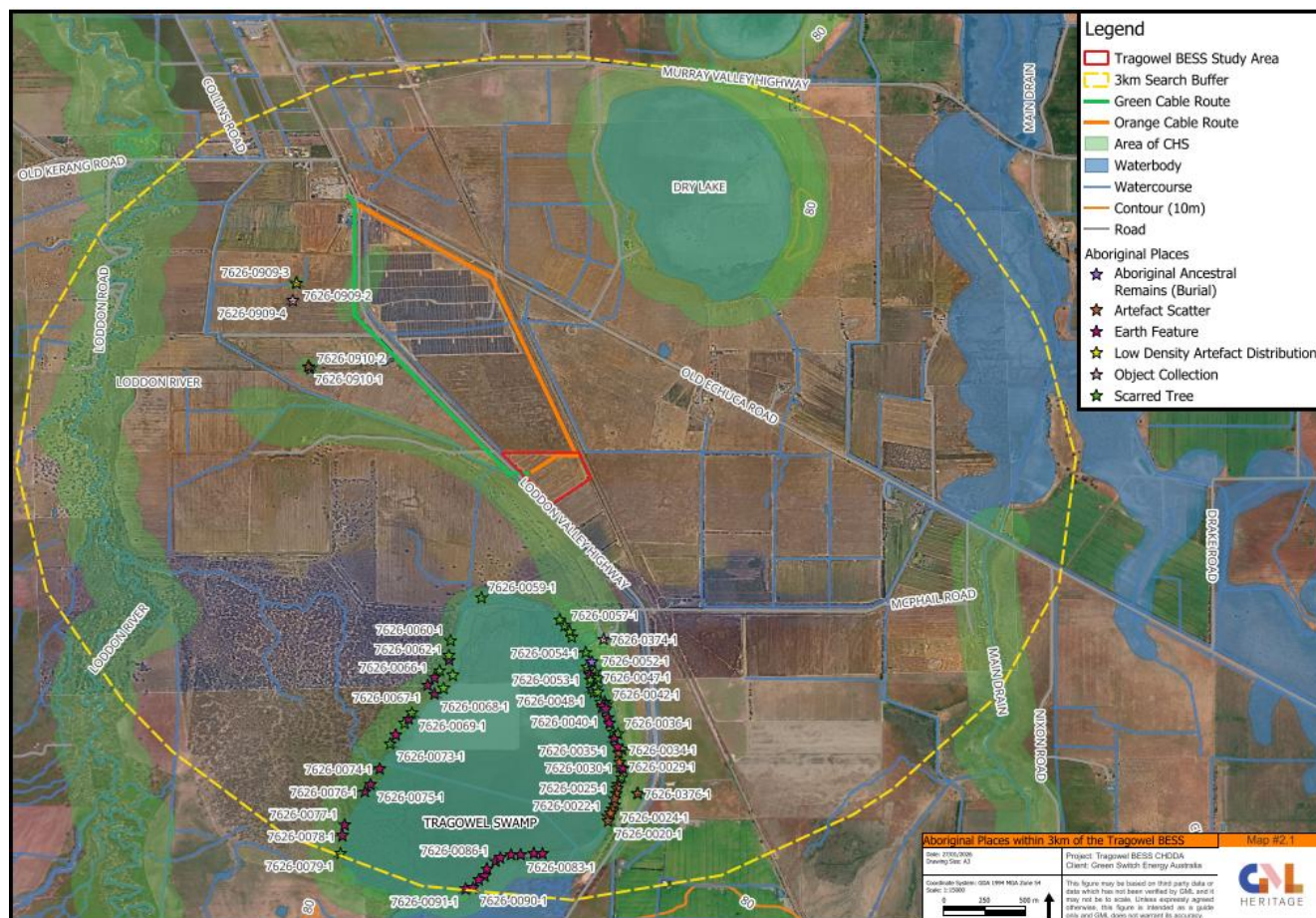


Figure 28 - Aboriginal Places within 3km of the Tragowel BESS

While the study area has experienced varying degrees of disturbance due to land use practices, the report concludes that Significant Ground Disturbance cannot be confirmed across GML's study area, nor in the areas of cultural heritage sensitivity associated with the lunette landforms along the western extent of the study area.

According to section 7 of the Aboriginal Heritage Regulations 2018, a CHMP is necessary when an activity occurs in an area of cultural heritage sensitivity and involves a high-impact activity. As defined under section 46(1)(b) of the Aboriginal Heritage Regulations 2018, a 'utility installation' qualifies as a high-impact activity.

Whilst the transmission line selected along the eastern extent of the study area has no identified areas of Aboriginal cultural heritage sensitivity, the Proponent has opted to complete a Voluntary CHMP for this Proposal. GML Heritage has collaborated with FPSR and interested Traditional Owner Groups to develop the Voluntary CHMP, which was approved on 30 December 2025 and will continue this partnership moving forward.

Impact Mitigation

The CHMP prepared for the proposal has been submitted to FPSR and was approved by the Victorian Aboriginal Heritage Register on 30 December 2025.

The preparation of the CHMP has involved:

- A desktop assessment to determine the potential for Aboriginal cultural heritage to be present
- A standard assessment was undertaken from 27 to 28 May and developed in consultation with representatives from BBAC and WWAC. The standard assessment was undertaken to identify any visible Aboriginal cultural heritage, establish the nature, extent, and context of any Aboriginal cultural heritage, and assess the archaeological sensitivity of the landforms present

- A complex assessment was undertaken from 28 to 30 May 2025 following the standard assessment. This assessment was developed in consultation with field representatives from BCAC and WWAC and was undertaken to determine the stratigraphy and general subsurface nature of the Project Site.
- Consultation with and approval from First Peoples State Relations.

These assessments determined that no Aboriginal cultural heritage was located in the Project site, and that the activity will not harm any known Aboriginal cultural heritage in the region. Despite this, the conditions and contingencies have been developed to manage impacts to Aboriginal cultural heritage (both tangible and intangible values) within the broader region during the construction and operation of the BESS.

7.3 Transport

A Transport Impact Assessment has been prepared by onemilegrid. The impact assessment outlines existing traffic conditions, proposed traffic generation, and the impact of the Proposal on the road network. A copy of the assessment dated 29 January 2025 is provided at Appendix F.

Access to the Project Site is proposed through two new entry points on the Loddon Valley Highway. The primary entry point will serve as the main route for all vehicles to enter and exit the Project Site while the secondary entry point will be designated for emergency access. Both access points are situated within the Transport Zone (TRZ2) and feature a single traffic lane in each direction, along with grassed verges on either side.

The assessment determined that the proposed access points can accommodate the proposed vehicles entering and exiting the Project Site without the need to provide right and left turn lanes or further road upgrades along the Loddon Valley Highway.

The assessment concludes that during the peak construction phase, the Proposal will create short-term, elevated levels of traffic; however, the level of traffic generated is expected to have a minimal impact on the operation or safety of the local road network based on its existing conditions. During the construction period, a detailed Construction Traffic Management Plan (CTMP) will be prepared and detail any proposed traffic mitigation measures. Additionally, during operation, the Proposal is expected to have a negligible impact on the local road network.

Impact Mitigation

The Transport Impact Assessment recommends the following traffic impact mitigation measures to be implemented as part of the CTMP:

- Temporary speed limit reduction along Loddon Valley Highway in the vicinity of the site, recommended speed limit: 80 km/hr (to be finalised in consultation with DTP).
- Radio communications between construction vehicles at all times.
- All movements by OSOM vehicles to be controlled via Traffic controllers; and
- Truck warning signage to be installed on Loddon Valley Highway in the vicinity of the site

The primary access will be used for a period of 18 months during construction, with the most intensive traffic occurring over a peak period of up to six months. After this, once the Proposal becomes operational, traffic volumes will significantly reduce requiring no further mitigation.

7.4 Landscape and Visual

A Landscape and Visual Impact Assessment (LVIA) has been prepared by Peter Haack Consulting. A copy of the LVIA dated 21 January 2026 is provided at Appendix G. Key considerations for the LVIA include:

- The number and location of sensitive viewing locations

- The duration of the view – either static (generally long term > 1 hour) and mobile (generally short term, continually moving and static for no longer than 5 minutes)
- The degree to which the proposed works would be visible
- The quality of the landscape setting
- The degree to which the Proposal contrasts or is compatible with the visual character of the setting – the visual modification level.

The LVIA identifies 11 sensitive viewpoints within a 2 km radius of the BESS Development Area. Refer to Figure 29 for further details on the identified viewpoints. The LVIA determined that the existing agricultural landscape of the BESS Development Area and its surrounds is of relatively “low scenic quality.” Within the nearby area, there is existing electrical infrastructure that contributes to the landscape, including the Kerang Terminal Station, the Kerang Solar Plant, and existing overhead transmission lines and towers.



Figure 29 – Assessed viewpoint locations (LVIA, Peter Haack Consulting)

The assessment found that the landscape surrounding the Proposal has a generally moderate capacity to absorb changes. The area features flat terrain with vegetation that varies from scattered patches to occasional dense clusters. Most sensitive viewpoints do not have a clear line of sight to the Proposal, as even relatively low vegetation (up to eye level) is effective in blocking views.

It is considered that the development of the Proposal would not constitute a large change to the existing character of the local area. It was determined that the proposed “co-location” of the Proposal near existing infrastructure is in accordance with best practice, constraining the cumulative visual impact of the infrastructure to a reasonably limited area.

Before mitigation, only a limited number of sensitive viewpoints (Viewpoint 2 and Viewpoint 7) near the Proposal were identified as experiencing a high or moderate level of impact. While the Proposal will be visible from Viewpoint 2 and Viewpoint 7, the flat topography suggests that planting additional vegetation will likely be very effective in visually screening the Proposal. Overall, aside from these viewpoints, the Proposal is assessed as having a relatively low level of visual impact or not being visible at all, thanks to existing vegetation, particularly around the rural residences.

Mitigation measures are proposed to further minimise potential visual impacts

Impact Mitigation

The LVIA proposes the following amelioration strategies:

- Perimeter screen planting along northern, eastern and western boundaries of the site
- Use non-reflective, neutral colours for BESS Units and associated infrastructure

A landscape amelioration strategy is included in the LVIA. A condition of the permit would require a landscape plan to be prepared and approved.

7.5 Noise Impact

A Noise Impact Assessment has been prepared by SLR Consulting Pty Ltd. A copy of the assessment dated 27 January is provided at Appendix H.

Key considerations for the Noise Impact Assessment include:

- Determining the existing noise environment of the project area through background noise monitoring
- Modelling the expected noise emissions from the construction and operation of the proposed BESS
- Assessing the expected noise impacts against the various requirements of the EPA
- Consideration of cumulative noise impacts of existing and planned industry in the surrounding project area.

The assessment identified 4 sensitive receptors within approximately 1 km of the BESS Development Area and concluded that:

- Construction of the Proposal may be intermittently audible at some nearby receivers; however, noise impacts are expected to be minor due to the separation distances, the temporary nature of works, and construction being limited to EPA-defined normal working hours (day period only).
- Construction noise will be managed through restrictions to daytime works, appropriate equipment selection and maintenance, workforce training, and ongoing community engagement.
- Operational noise from the Proposal is predicted to comply with the applicable Noise Protocol at all sensitive receivers for all relevant time periods under 2 scenarios applied in the assessment, which included the following:
 - Scenario 1: Day and evening – Batteries at 45 C, inverter 85% power load (refer to Figure 30)
 - Scenario 2: Night – Batteries at 35 C, inverter 85% power load (refer to Figure 31)
- Cumulative operational noise from the Proposal in combination with the existing Kerang Solar Plant and the proposed Kerang BESS and Solar Farm Hybrid was assessed, with compliance demonstrated at all sensitive receivers.
- Low-frequency noise was assessed in accordance with the relevant Low Frequency Guidelines, with results indicating a low risk of problematic low-frequency noise at the nearest sensitive receivers.

- The existing acoustic environment within the Tragowel Swamp Conservation Reserve was qualitatively assessed with reference to the Environmental Reference Standard (ERS), with the Proposal expected to be inaudible in the southern portion of the Reserve and not expected to noticeably alter the existing noise environment in the northern portion.

Overall, the Project is considered to meet relevant regulatory requirements and is not expected to result in unreasonable acoustic impacts on the surrounding area; as a result, no additional noise mitigation measures are required for the Proposal

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Figure 30 – Operation Noise Assessment Scenario 1 (NIA, SLR)



Figure 31 – Operation Noise Assessment Scenario 2 (NIA, SLR)

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Impact Mitigation

During construction, potential noise impacts will be mitigated by restricting works to daytime hours, appropriate equipment selection and maintenance, workforce training, and ongoing community engagement. Once operational, no further impacts are anticipated on nearby sensitive receptors, meaning no further noise mitigation measures are proposed.

7.6 Fire Hazard and Bushfire Risk

A Risk Management Plan (including Fire Safety Study) was prepared by Fire Risk Consultants. A copy of the assessment dated 19 January 2026 is provided at Appendix I.

The objective of the assessment was to identify primary fire risks associated with the implementation, function, and location of the Proposal, including the BESS units.

The scope of the assessment was to:

- Provide a risk review consistent with fire risk assessment techniques for hazardous industry planning,
- Undertake a bushfire hazard assessment to understand potential bushfire scenarios,
- Ensure compliance with Country Fire Authority (CFA) requirements to address fire risk within renewable energy and energy storage facilities,
- Recommend mitigation measures if required.

The assessment concludes that the indicative design and layout of the Proposal meet the requirements of the CFA Guidelines and can adequately manage fire risk to an acceptable level. Through a combination of careful site selection, layout design, mitigation measures, and operational controls, the Proposal is considered to have a low residual fire risk that can be effectively managed during its construction and operation. Consultation has been undertaken with the CFA by Fire Risk Consultants inform the Proposal's design and fire risk mitigation equipment and infrastructure

The assessment identified that the most common risks associated with the Proposal include electrical faults, dangerous goods, and potential impacts on staff or firefighters during a fire. These risks are not unique to this proposal; they are inherent to all grid-scale BESS facilities. In each case, the proposed measures, such as 24/7 SCADA monitoring, strict maintenance protocols, technical response plans, and controlled site access, would help to minimise these risks to acceptable levels. The design of the Proposal ensures that a fire originating from one battery unit is highly unlikely to spread to adjacent units. Additionally, firefighting agencies will not be required to conduct internal suppression, which is in line with current fire management practices for BESS.

Flood considerations have been integrated into the overall risk framework of this assessment. The proposed elevated infrastructure, situated above historical flood levels, will ensure safe platform access and allow the Proposal to withstand the impacts of simultaneous flood and fire scenarios. It is recognised that access for fire brigades may be limited during major flood events.

Once a BESS supplier has been selected, an updated Risk Management Plan will be provided to confirm these conclusions prior to construction.

Impact Mitigation

The Risk Management Plan (including Fire Safety Study) identifies the following requirements to be implemented to satisfy the objectives of the relevant authorities:

- **Adopt design and construction techniques and solutions to mitigate fire risk**, including implementing separation distances between battery units, ensuring fire-rated construction for all BESS units, non-combustible surfacing throughout the BESS, and impact protection barriers surrounding battery units and critical electrical infrastructure.
- **Ensure access to and around the site**, by providing a 4m perimeter road capable of supporting a 15-tonne vehicle access, and multiple access points into the BESS area.

- **Ensure sufficient water supply**, including by installing AS2419.1 compliant hydrant systems with minimum 432,000 L static water supply, and providing dual-outlet hydrants at key access points.
- **Implement vegetation and fuel management measures**, including managing grass height during fire danger periods and maintaining separation between vegetation screening and battery units, and maintaining 10 m firebreaks around the site and all infrastructure.
- **Adopt monitoring and maintenance systems**, including by conducting 24/7 SCADA monitoring, implementing rapid technician deployment protocols, and routine inspections of equipment and systems.
- **Establish and implement dangerous goods handling practices**, including conducting smoke and gas modelling to support firefighting and warning systems, and maintaining a complaint Dangerous Goods Register, providing spill containment measures, and establishing procedures in the event of Dangerous Goods leaking.
- **Promote flood resilience**, by ensuring platform heights meet or exceed historic flood levels, providing safe access for firefighters during periods of flood, and incorporating flood-fire scenario procedures in the Emergency Management Plan.
- **Develop and implement emergency management procedures**, including an Emergency Management Plan in accordance with CFA Guidelines, Emergency Information Container at primary entrance, and undertaking initial and ongoing engagement with the CFA.

7.7 Hydrology and Stormwater Management

A Hydrology Impact Assessment and Stormwater Management Strategy was prepared by Dalton Consulting Engineers. The assessment looked at the existing conditions of the Project Site, as well as post-development hydrology, informing the design of the Proposal and providing appropriate management strategies. A copy of the assessment dated 30 January 2026 is provided at Appendix J.

The assessment discusses the impacts of on-site filtration and surface water quality, including water quality in adjacent land and waterways, and stormwater and run-off management. Since the Proposal is situated within the Loddon River floodplain and is subject to the ESO4, the assessment takes into account riverine flooding. It also evaluates the Proposal against the design requirements set forth by the North Central CMA to ensure adherence to the standards established under ESO4 (refer to section 6.4.3.1)

The general design standards under the ESO4 and North Central CMA provided to the Proponent are outlined in Table 17, with additional commentary around how the proposal effectively addresses these requirements by design.

Table 17 – Assessment of the Proposal against North Central CMA Design Requirements

Design standards	Compliance of Proposal
Finished floor levels of all buildings and critical infrastructure to be set no lower than 79.7 m AHD.	The concept design of the Proposal provides additional elevation of assets above this level. The BESS units will be placed at a minimum level of 79.75 m AHD, higher than the CMA's requirement of 79.7 m AHD.
No obstruction of flood flows for the reduction in flood storage. Flood conveyance in all directions and a cut-fill balance are required.	Creation of raised earth benches (fill pads) and the use of piers to elevate the BESS units ensure protection of the Proposal from external flows, as well as minimising any impacts to existing flood flows.
Safe access must be provided, even during periods of prolonged flooding.	Safe vehicular access to the Proposal is achieved based on the current concept design.
A fill pad set at 79.4 m AHD.	The substation and control building areas will be filled to a level of 80.62 m AHD, higher than the CMA's requirement of 79.4 m AHD. The cut-fill balance can be achieved through the development of the Proposal
The design of the fill pad is such that it is protected from wave action erosion during	Side slopes will be applied to the raised earth bench (fill pads) within the Project Site, providing erosion protection against wave action that may occur during extended periods of inundation.

Design standards	Compliance of Proposal
prolonged periods of inundation.	
Preparation of a flood response plan.	A flood response plan will be prepared during detailed design
Achievement of best practice stormwater guidelines.	Best practice stormwater guidelines will be achieved through compliance with IDM design standards.

For a comprehensive overview of how the Proposal meets compliance with the design standards, refer to section 4 within Appendix J.

The assessment concludes that the Proposal can be developed on the Project Site with minimal impact on the existing hydrological conditions. Furthermore, stormwater runoff can be managed according to the requirements established in the initial discussions with the Council and the North Central CMA. The proposed stormwater management plan also ensures that the requirements set by CFA for the containment of firefighting runoff will be met. The proposed stormwater management provides green engineering solutions that treat stormwater to improve downstream water quality beyond statutory requirements.

Impact Mitigation

The following measures will be implemented to meet design standards and ensure effective flood and stormwater management:

- No assets (including batteries) will be located lower than 79.75 m AHD, exceeding CMA requirements.
- The BESS Development Area will be graded to drain by a vegetated swale to the proposed detention basins that serve as retarding basins and intercept dams.
- A pumped overland outlet will discharge to adjacent paddocks to the Bess Development Area, where the water will dissipate.
- Elevated BESS units located on piers allow for flow conveyance in the event the BESS Development Area is inundated.

The report provides confidence that the stormwater run-off generated by the Proposal can be managed on-site under the proposed developed conditions. As a condition of approval, it would be expected that detailed design finalisation would include updated modelling and drainage storage calculations.

7.8 Agriculture

An Agricultural Impact Assessment was prepared by Ag-Challenge Consulting. A copy of the assessment dated November 2025 is provided in Appendix K.

Assessment of the Proposal identifies that the BESS Development Area is considered suitable for its current purpose of grazing polled Dorset lambs and Suffolk sheep stud. The predominant soil type across the farming property is not appropriate for intensive agricultural practices and is primarily limited to grazing and fodder production. Due to extensive grazing activities, the infrastructure on-site consists mainly of fencing and a water supply.

The BESS Development Area has access to irrigation water from Goulburn Murray Water, which flows through a farm channel along the western edge of the project site, with the offtake located approximately 600m to the south. The current irrigation infrastructure within the BESS Development Area is deemed limited because of the low-value soils in the surrounding area. While the ability to flood irrigate the farmland is advantageous, the limited versatility of the soils diminishes the overall value of this asset, and subsequently the agricultural land in the BESS Development Area.

The development of the Proposal will result in the parcel of land being unsuitable for flood irrigation or grazing. However, the agricultural productivity of the land is more closely tied to the availability of irrigation water than to the land itself. The assessment found that the irrigation water currently available within the BESS Development Area can be effectively redistributed to other parts of the farming property to increase their productivity. As a result, there will be minimal negative impacts on agricultural productivity. The report concludes that the development of the Proposal will not have any detrimental impacts on the surrounding farm businesses, which are primarily grazing properties.

Impact Mitigation

The assessment recommends that the remaining balance of the land be used to relocate irrigation water to mitigate the loss of agricultural land for grazing and the productivity of the water resources.

The flood irrigation channel along the western edge of the site will be removed, and the water will be redirected towards the three paddocks that will remain part of the broader farming operations on the project site.

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8. Conclusion

This Planning Application demonstrates that the proposed Tragowel BESS application, for use and development of land for a Utility installation, is an appropriate use and form of development for the Project Site.

The 200MW/800MWh BESS is a key energy infrastructure development for the Gannawarra Shire and the wider Loddon Malle region. The Proposal will provide critical electricity grid services, significant regional economic benefits, and a major contribution to Victoria's energy storage targets.

Approval of this planning permit application is considered appropriate for the following reasons:

- The Proposal provides significant dispatchable energy storage, supporting Victoria's energy storage targets, and local existing and future energy generation projects and energy intensive users
- The Proposal is strategically located near the Kerang Terminal Station and the existing 220kV transmission line. It is also located in proximity to existing and proposed renewable energy infrastructure projects
- The Proposal is located within a highly modified landscape character, currently used for agricultural grazing
- The Proposal has been sited such that it is a sufficient distance from residential land and nearby sensitive receptors
- The BESS Development Area and Transmission Development Area have been located to minimise biodiversity impacts and native vegetation removal
- Loddon Valley Highway provides direct heavy vehicle access to the highway network, without the need for construction traffic to pass through residential areas, or otherwise require road upgrades
- The Proposal will have significant local and regional economic benefits, including:
 - Direct investment of approximately \$250 million, and local economic benefits through a proposed community benefit sharing scheme
 - Creation of approximately 80-120 construction jobs and 5 FTE operational jobs
 - Prioritisation of local employment opportunities to the extent possible for construction, operation, and maintenance, as well as supporting training and development of an emerging energy industry in Victoria's proposed North West REZ
- The Proposal is highly consistent with the key planning provisions of the Planning Scheme, including the relevant zones (FZ and TRZ2) and overlays (ESO2, ESO4 and SCO2)
- The Proposal strongly supports relevant State and local policy in relation to energy storage, emission reductions, infrastructure provision, and economic development within the Gannawarra Shire region
- The Proposal addresses fire safety requirements within the CFA Guidelines
- The Proposal addresses flooding and stormwater run-off management in line with ESO4 design standards and the North Central CMA requirements
- The development is considered appropriate to the Project Site's surrounds and does not unreasonably impact the amenity of nearby residences. Noise modelling demonstrates that the Proposal is capable of meeting Noise Protocol obligations upon operation. The components have been sited to minimise visual appearance to neighbours, and vegetation screening will further reduce visibility
- Construction impacts are manageable and will be further detailed in the environmental and construction management plans.

The application is supported by technical assessments that outline detailed investigations and justifications for the Proposal. Based on these technical assessments, the Proposal is not expected to generate any unreasonable or significant environmental or community impacts.

The Proponent has also undertaken a comprehensive community and stakeholder engagement program, appropriately informing nearby residents and the wider Tragowel and Kerang communities of the Proposal. Consistent and clear information has been provided to stakeholders and community members about the details of the Proposal, any potential impacts, and how to get involved.

The project team has engaged with DTP and other key stakeholders, including Gannawarra Shire Council, FPSR, CFA, and North Central CMA. The local community and stakeholders will continue to be engaged with during the exhibition and assessment phases of the application, and through the post-permit phase. The design concept has and will continue to evolve in response to technical assessments, community, and stakeholder feedback.

Considering the above reasons, it is requested that the Minister for Planning grant approval for this planning permit application.

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Appendices

Appendix A	Certificate of Title
Appendix B	Application Plans
Appendix C	Communication Materials
Appendix D	Biodiversity Assessment
Appendix E	Cultural Heritage Due Diligence Assessment
Appendix F	Transport Impact Assessment
Appendix G	Landscape and Visual Impact Assessment
Appendix H	Noise Impact Assessment
Appendix I	Risk Management Plan (including Fire Safety Study)
Appendix J	Hydrology Impact Assessment and Stormwater Management Strategy
Appendix K	Agricultural Impact Assessment
Appendix L	Head, Transport for Victoria Consent
Appendix M	Engagement Summary Report

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Appendix M Engagement Summary Report

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Our collaborative teams bring a uniquely nuanced understanding of planning processes and the technical aspects of renewable energy property, infrastructure, and circular economy projects, which helps to build a strong rapport and trust with local community members and stakeholders.

Unlike many in-house engagement and planning teams that are managed separately, our planners work in collaboration with our engagement practitioners to ensure that stakeholder and community consultation is at the heart of the planning process and a critical tool for delivering positive outcomes for our clients.

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