

\* Head Office / address for all correspondence:

■ \*Level 1, 135 Fryers Street, Shepparton, Vic. 3630

■ Phone: (03) 5820 7700

■ Fax: (03) 5822 4878

■ www.csmith.com.au

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

10 October 2024  
Our Ref: 20143

Minister for Planning  
c/- Divyaa Sundaravadivel, Renewable Team  
Department of Transport & Planning

Via DTP Permits Online portal

## Planning Permit PA2101321 Section 50 Amendment of Current Planning Application Goroke-Harrow Road, Charam (Crown Allotment 33, Parish of Konnepra)

Dear Divyaa,

Further to our previous discussions, we hereby seek to amend the proposed planning permit amendment under Section 50 of the Planning and Environment Act prior to notice.

This application no longer seeks to alter any conditions on this permit, as we now provide the documents originally sought to be deferred by the original proposal. It is our understanding that the approval of this documents by the CFA will enable endorsement of all current development plans under Condition 1 of the planning permit. Consequently, the following updated documents are submitted in support of this application, these are provided in addition to the documents originally submitted:

- **Risk Management Plan**  
by *Phoenix Wildfire Management (ver. 4)*
- **Fire Management Plan**  
by *Phoenix Wildfire Management (ver. 3)*
- **Emergency Management Plan**  
by *Phoenix Wildfire Management (ver. 3)*

**ADVERTISED  
PLAN**

This application still seeks to include the construction of four (4) battery energy storage system containers (BESS) and the reconfiguration of the site plan within the approved development footprint. The applicant has obtained specialist assessments of the proposed changes to demonstrate that the reconfiguration of the facility would not unduly impact any nearby sensitive land uses.

### Summary of Proposed Changes

The full extent of changes nor proposed are listed below and numbered in the figure underneath:

1. The original Site Plan proposed 12,312 panels, each generating around 500 Watts DC, for a total generation capacity of 6.16 MW DC. The model proposed was Risen Energy's Titan RSM150-8 panel, which is 2.2 metres long by 1.1 metres wide, and 35 mm thick.
  - a. The applicant has chosen to use a more efficient panel which generates 600 Watts DC. The panel is the same size as the RSM150-8.
  - b. The revised site plan proposes 10,287 panels, each generating 600 Watts DC, for a total generation capacity of 6.17 MW. The layout of the solar arrays has changed to reflect the reduced number of panels.
2. Four (4) BESS containers have been added, located in the south-east corner of the facility. The BESS have been included as they will increase the utility of the facility.

# ADVERTISED PLAN

**Chris Smith**

& ASSOCIATES  
PTY LTD

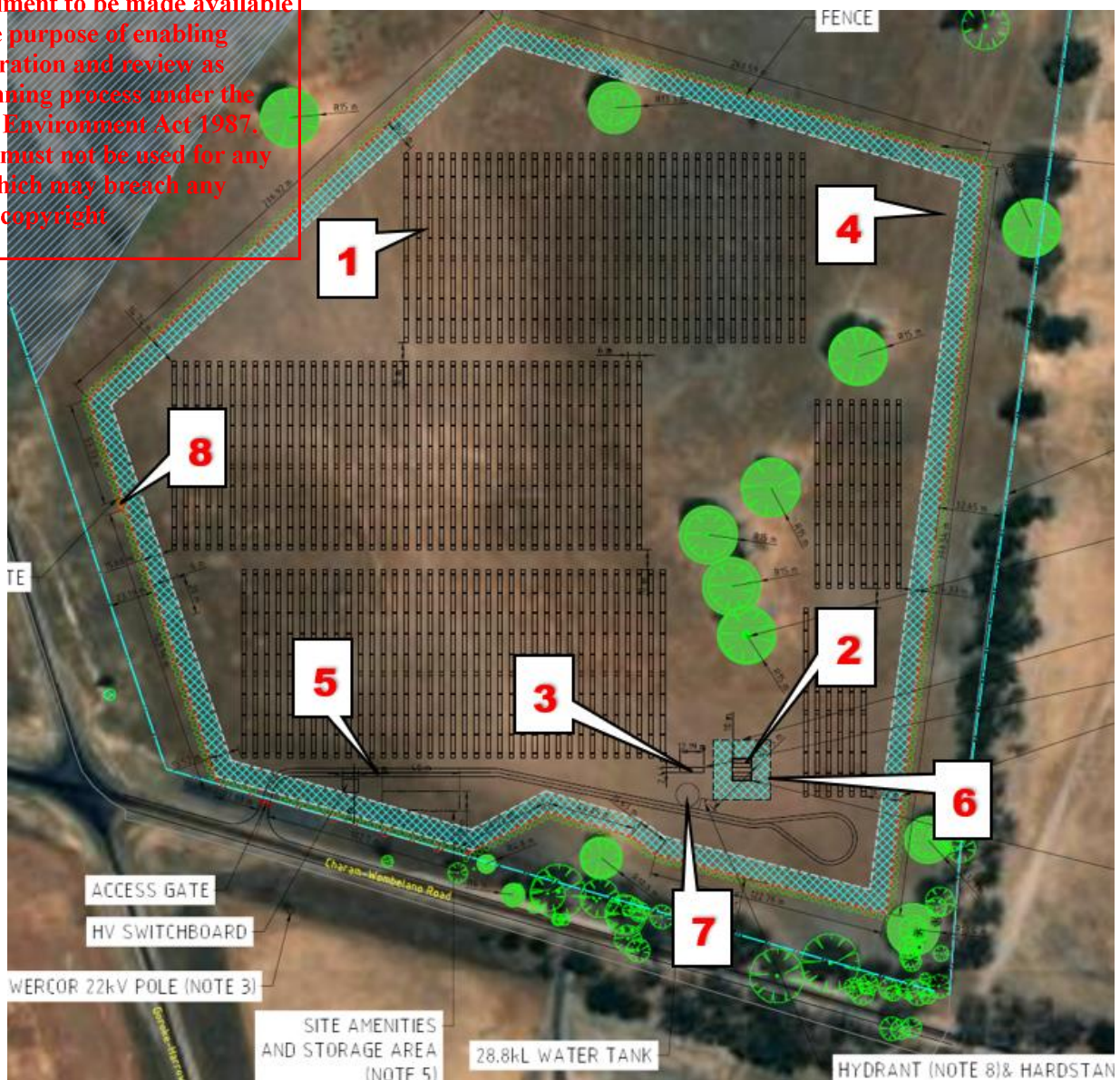
3. The Medium Voltage Power Station (MVPS) has been relocated to the south-east corner of the facility. The purpose of the change is to reduce the amount of cable required.
4. The perimeter road has been removed. This was done because the CFA's 'Design Guidelines and Model Requirements for Renewable Energy Facilities (Version 4, August 2023) no longer require a perimeter road for micro solar farms.

To comply with the requirements of the CFA's 'Design Guidelines and Model Requirements for Renewable Energy Facilities (Version 4, August 2023), the following fire protection features have been added to the facility:

5. An all-weather internal road has been added, from the main gate to the BESS.
6. An Asset Protection Zone has been added around the BESS containers.
7. A water tank, hydrant and hardstand area have been added, close to the BESS, along the internal road.
8. A secondary gate has been added to the western side of the facility.

The change in the site plan is for the solar array configuration only, the development will remain within the approved footprint. Therefore, the overall land use and extent of development has not meaningfully changed in any way.

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



Summary of changes

# ADVERTISED PLAN

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

## Assessment of Proposed Changes

### Glint and Glare Assessment

The permit was approved based on a Glint and Glare Impact Assessment (Environmental Ethos, dated 15/8/2021). The assessment has been updated based on the revised site layout. This assessment has considered the potential impact of the amended facility on nearby receptors within a 2km radius of the facility.

The SGHAT did not identify any local roads to be affected by glare. Therefore, concluded that no impact is likely from this proposal. The assessment also concluded that there would be no glare on any nearby dwellings, nor any other sensitive receptors as a result of the proposed tracking arrays.

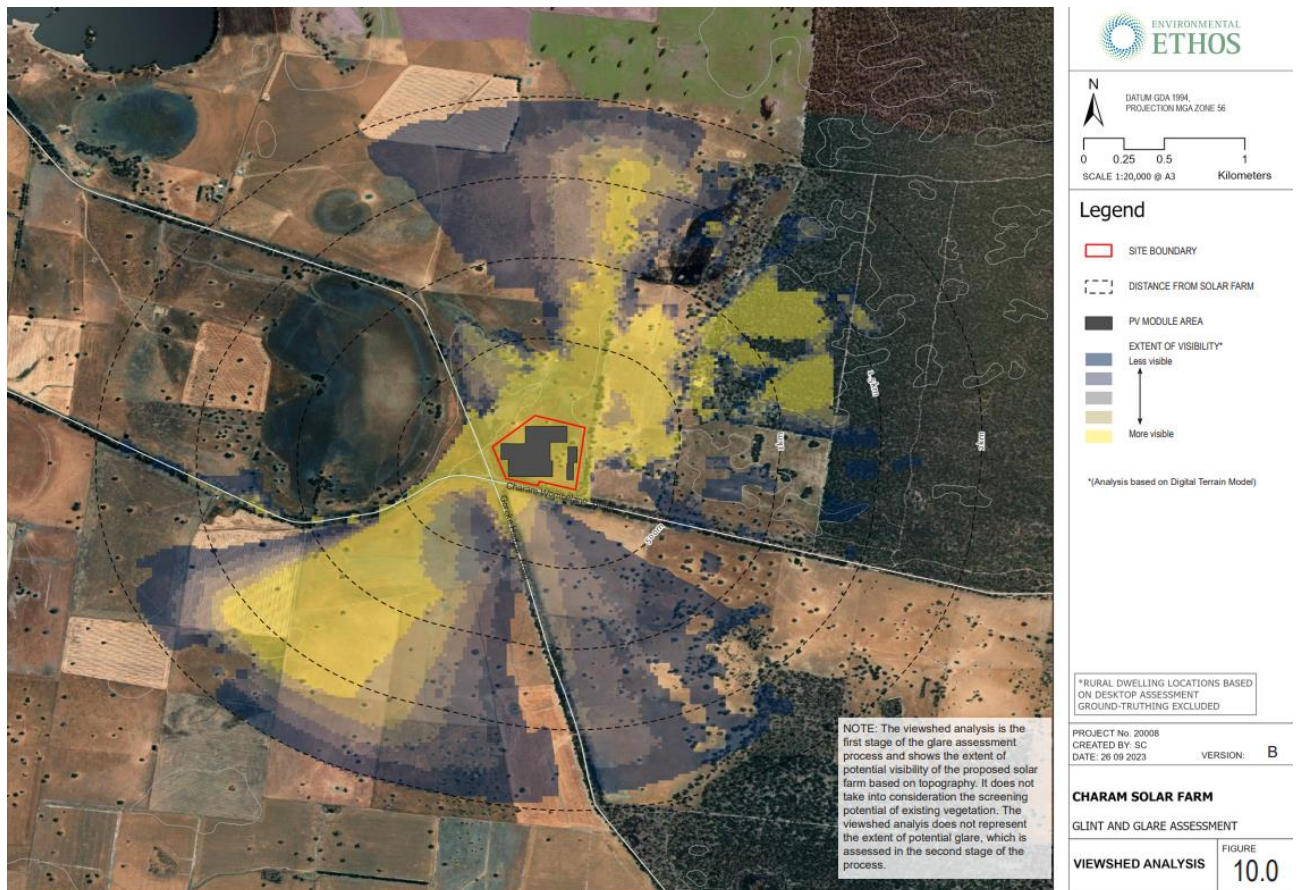


Table 2. SGHAT Assessment Results

Sensitive Receptor	Glare Potential
Charam Wombelano Road	No Glare
Harrow Goroke Road	No Glare

### Acoustic Assessment

Prepared by ADP Consulting, this acoustic assessment has assessed the potential noise impacts on the surrounding area against the standards of the **EPA's 1826.4: Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises and entertainment venues** ("Noise Protocol" herein).

The proposed changes remain well below the acceptable Noise Protocol standards. Any noise generated from the inverters, batteries and from the array motors would adequately dissipate prior to reaching any of the identified receptors – being one residence 2.5 kilometres north west on Mclennans Road, approximately 2 kilometres away from the site and the Konnepra State Forest 1.25 kilometres east of the development site.

# ADVERTISED PLAN

**Chris Smith**

& ASSOCIATES  
PTY LTD

For reference, the minimum acceptable noise levels under the Noise Protocol are illustrated in the **Table 3**, below. This table should be cross referenced with the anticipated noise levels at each respective receptor/dwelling modelled in the below tables:

Table 1 Noise emission criteria summary for the local residences and State Forest

Day of operation	Time of operation	Noise Limit, dB(A) Residences	Noise Limit, dB(A) State Forest
<b>Monday to Friday</b>	Day (7am to 6pm)	46	45
	Evening (6pm to 10pm)	41	40
	Night (10pm to 7am)	36	35
<b>Saturday</b>	Day (7am to 1pm)	46	45
	Evening (1pm to 10pm)	41	40
	Night (10pm to 7am)	36	35
<b>Sunday</b>	Evening (7am to 6pm)	41	40
	Night (10pm to 7am)	36	35

It should be noted that the cumulative noise emission from the operations of the proposed development are to meet the specific noise criteria in Table 1.

Table 2 Plant and equipment sound power levels

Equipment in use	Sound Power Level, dB(A)
TBEA Inverter noise	81
NEXTracker Motor (each, approx. 132off)	49
BESS ST2752UX Liquid Cooling Battery Container System* (each, approx. 8off for worst case scenario)	97

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

\*ADP is unaware of the equipment selection at this stage, manufacturer data has been chosen to represent typical noise associated with solar power generation and storage.

Table 3 Noise emission levels at closest sensitive receivers

Receiver location	Time of day	Receiver noise levels, dB(A)	Criteria, dB(A)	Compliance
Residence to the north-west, on Mclennans Road	Day (7am to 6pm)	22	46	Yes
	Evening (6pm to 10pm)	22	41	Yes
	Night (10pm to 7am)	22	36	Yes
Konnepra State Forest	Day (7am to 6pm)	31	45	Yes
	Evening (6pm to 10pm)	31	40	Yes
	Night (10pm to 7am)	31	35	Yes



## Arboricultural Impact Assessment & TPMP

The permit was approved based on an Arboricultural Impact Assessment (Tree Care Consulting, dated 6/4/2022). The assessment has been updated based on the revised site layout. The assessment found that the proposed layout will not impede on the Tree Protection Zones (TPZs) of any trees within the development site and near the development site. The revised Site Plan includes the TPZs calculated in the report.

A **Tree Protection Management Plan** has been prepared to ensure that trees are protected during construction.

## Amendment Pathway

In light of the above information, the changes to the approved layout do not result in a substantial transformation to the approved solar energy facility. The external dimensions of the facility remain comparable and the setback from the northern/front boundary remains as per the currently approved facility.

Amenity impacts on surrounding dwellings will be appropriately managed by the landscape screening currently approved and no acoustic or visual mitigation beyond that required by the existing permit would be required.

The proposed batteries that are to be installed within the approved facility are categorised as “*minor utility installations*” under the Planning Scheme and are not subject to planning approval. Nevertheless, the BESS have been shown on the amended plans to satisfy the relevant authorities that best practice design has been applied.

For the reasons outlined in this correspondence, it is considered unlikely that there would be any undue impact on off-site amenity arising from the proposed amendment.

Therefore, it is requested that the Minister approve the sought changes to Planning Permit PA2101321.

Should you require any further information in this matter, please do not hesitate to contact our office.

Yours sincerely,



**Duncan Lewis**

Town Planner

[duncan.lewis@csmith.com.au](mailto:duncan.lewis@csmith.com.au)

Direct: (03) 5820 7728

Doc No.: 20143\_L\_Permit Amendment, Charam Solar Farm\_181223

## ADVERTISED PLAN

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