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Visual Impact Assessment

**Maffra Solar Farm – Lot 13\TP23981, Maffra-
Briagolong Road, Maffra 3860**

November 2022

Project Number: 22-151



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1. Introduction

1.1 Overview

This Visual Impact Assessment (VIA) has been prepared by NGH on behalf of BNRG Leeson (the proponent), to assess the potential impacts of the Maffra Solar Farm and Battery Energy Storage System (BESS) (the proposal) at Lot 13 TP23981, Maffra-Briagolong Road, Maffra, 3860.

The land is approximately 3km north by road from the town of Maffra and 20km northwest of the City of Sale, Victoria within the Wellington Shire Council Local Government Area. The subject land is zoned Farming Zone (FZ) and has an area of approximately 53.79ha. The land is rectangular in shape and the proposal is located in the western portion of the land. Lot 3 TP964820 splits the subject land and is zoned Public Use Zone (PUZ1), no works are proposed within this lot.

The proposal, refer to Figure 1-1, includes the installation of approximately 12 hectares (ha) of solar energy generating and electricity storage infrastructure and associated works in the western portion of the subject land, including:

- Single axis (tracking) solar arrays.
- Inverter/substation and BESS.
- Electricity line connection.
- Site entry.
- Internal access roads and buffer areas.
- Storage Shed, fencing, lighting, and landscaping.

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Figure 1-1 Proposal layout - Site context plan (Source: BNRG Renewables Ltd)

This VIA identifies and assesses the potential visual impacts associated with the construction, operation, and decommissioning of the proposal. The construction and decommissioning would result in temporary impacts, whereas the operation of the proposal having a minimum 30-year life span has potential to result in longer term impacts, specifically for near neighbours and road users. This assessment considers the design of the proposal in relation to the near neighbours, local road users and distant views.

The land is subject to the planning provisions of the Wellington Planning Scheme and is located on land zoned Farming Zone (FZ). This VIA considers the proposal against the purpose of the FZ and associated decision guideline Clause 35.07-6 and other relevant clauses of the scheme.

1.1.1 VIA approach

The Solar Energy Facilities Design and Development Guideline (DELWP, 2019) requires assessment of the visual impact of a solar energy facility, including:

- The sensitivity of the landscape and its ability to absorb change.
- The size, height, scale, spacing, colour and surface reflectivity of the facility's components.
- The number of solar energy facilities located close to each other another within the same landscape.
- The excessive removal, or planting of inappropriate species of vegetation.
- The location and scale of other ancillary uses, buildings and works including transmission lines, battery storage units and associated access roads.
- The proximity to environmentally sensitive areas such as public land, water courses and low-lying areas.

To address the requirements of the guideline, a VIA was completed by NGH in the following stages:

1. Background investigations and mapping, defining where the proposal may be visible in the landscape, and identifying key viewpoints such as local and main roads and dwellings within proximity of the proposal. All 'potential dwellings' as identified in Figure 1-6 are conservatively treated as dwellings for assessment purposes.
2. Photography of the landscape in the area near the proposal site.
3. Consideration of community consultation undertaken by the proponent.
4. Impact assessment, describing the potential impact on visual amenity during construction and operation of the proposal, including potential for light spill and dust impacts.
5. Consideration of the any required visual impact mitigation measures.

The impact assessment methodology used in this VIA for operational impacts is based around the Bureau of Land Management (BLM) Visual Resource Management System, developed by the BLM, US Department of the Interior (n.d.) and is consistent with similar VIA methods used by Australian State departments/agencies and is therefore considered a best practice visual impact analysis method and acceptable for the purpose of this VIA. The BLM developed a systematic process to analyse the visual impact of proposed developments. The basic philosophy states that the degree to which a development affects the visual landscape depends on the visual contrast imposed by the project. Key steps undertaken to assess the visual impact are as follows:

- Define the landscape:

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- ### 1.1.2 Terrain, character and existing vegetation

[illegible]

The proposal site is within the outer lying farming areas of Maffra, a rural town. The town is located on the rises of the Macalister River. The farming areas surrounding the site are a mix of irrigated crops and grazing land. Small areas of native plantation are located on land surrounding the proposal site. The approach to the proposal site is via the Maffra-Briagolong Road and rises from the town peaking just north of the site before travelling downhill again to the north.

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Figure 1-3 View of the proposal site from the north, showing existing vegetation including plantation, and powerlines in the east (Source: NGH, 2022)



Figure 1-4 Views towards the proposal site from the south from Brewers Hill Road (near the approved Brewers Hill Road Maffra Solar Farm) (Source: NGH, 2022)

1.1.3 Community values

Community consultation for the proposal was conducted for near neighbours by the proponent, examples of views from the proposal site to the nearest dwellings are shown at Figure 1-5.

Most of the near landowners were directly engaged and the wider community and the near landowners were invited to a drop-in session at a local hall. Aspects of the proposal were discussed with the local residents, including visual amenity.

Comments from available near neighbours and drop-in session attendees included:

- General positive response.

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Figure 1-5 Examples of distance, trees and topography providing screening for existing dwellings to the southwest (dwellings slightly raised above the site with vegetation (garden, paddock, roadside and plantation trees) filtering or blocking views, and to the west (mostly roofs visible and grass paddocks and trees forming foreground views) of the proposal site (Source: NGH, 2022)

1.1.4 Visual sensitivity

The predicted sensitivity of each viewpoint can be determined considering its proximity to the proposal site and factors such as use, scenic quality and regional significance.

Criteria for proximity are as follows:

- Foreground, 0 – 1km.
- Middle ground, 1 – 2km.
- Background, more than 2km.

Criteria for scenic quality are as follows:

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- High sensitivity:
 - High use routes or areas.
 - Routes or areas of national or state significance.
 - Areas with high scenic quality (i.e., land subject to significant landscape overlay under the planning scheme).
- Moderate sensitivity:
 - Moderate use routes or areas.
 - Routes or areas of regional or local significance.
 - Areas with moderate scenic quality.
 - Dwellings.
- Low sensitivity:
 - Low use routes or areas.
 - Routes or areas of low local significance.
 - Areas with low scenic quality.

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1.1.5 Landscape character and representative viewpoints

The BLM methodology requires identification of representative viewpoints in the study area. These may be along travel routes, near waterways and recreational areas, residential areas, tourist facilities, houses, and farmland.

Considering topography, vegetation, land use, and other distinct landscape features, subject and immediately surrounding land (up to 2km, see Figure 1-6) is described as:

- Gently sloped, undulating and some slightly steeper slopes, generally from 20m AHD to 80m AHD.
- A mix of open modified agricultural (rural) landscape with rural dwellings, irrigated, cropped and grazing land with water channels (open creeks) present, and areas of woodland (natural and planted native forestry) in proximity and within the proposal site.
- Maffra township spreads north and east of the town centre due to the location of potential flood and inundation areas from the Macalister River and Avon River. Closer to the proposal site the development make up is typically small hobby scale lots changing to larger holdings.
- Rural sealed roads with established roadside vegetation, with a mix of shrubs and trees.
- Rural unsealed roads.
- Rural living (RLZ) areas including some undeveloped land to the west.
- Maffra urban and recreation areas to the south.
- Areas of Council managed land to the southwest.

The scenic quality for land within 5km was identified as follows:

- A high scenic quality for natural landscapes (reserves/wetlands, private areas of natural woodland, primary rivers, and river frontage, i.e., Macalister River, Avon River).
- A moderate scenic quality for modified landscapes (i.e., gardens around dwellings on larger rural residential lots and in urban residential areas), general agricultural areas, modified

grasslands grazing and cropped land etc, recreation areas, and areas of quality roadside vegetation, creeks, and streams.

- Lower scenic quality in areas of roads, industrial areas.

The 6 viewpoints provide a representation of the landscape character and show the variations in scenic quality of the area and available views (see Figure 1-6 for the locations and Table 2-1 for photos, all 'potential dwellings' as identified in the map are conservatively treated as dwellings for assessment purposes).

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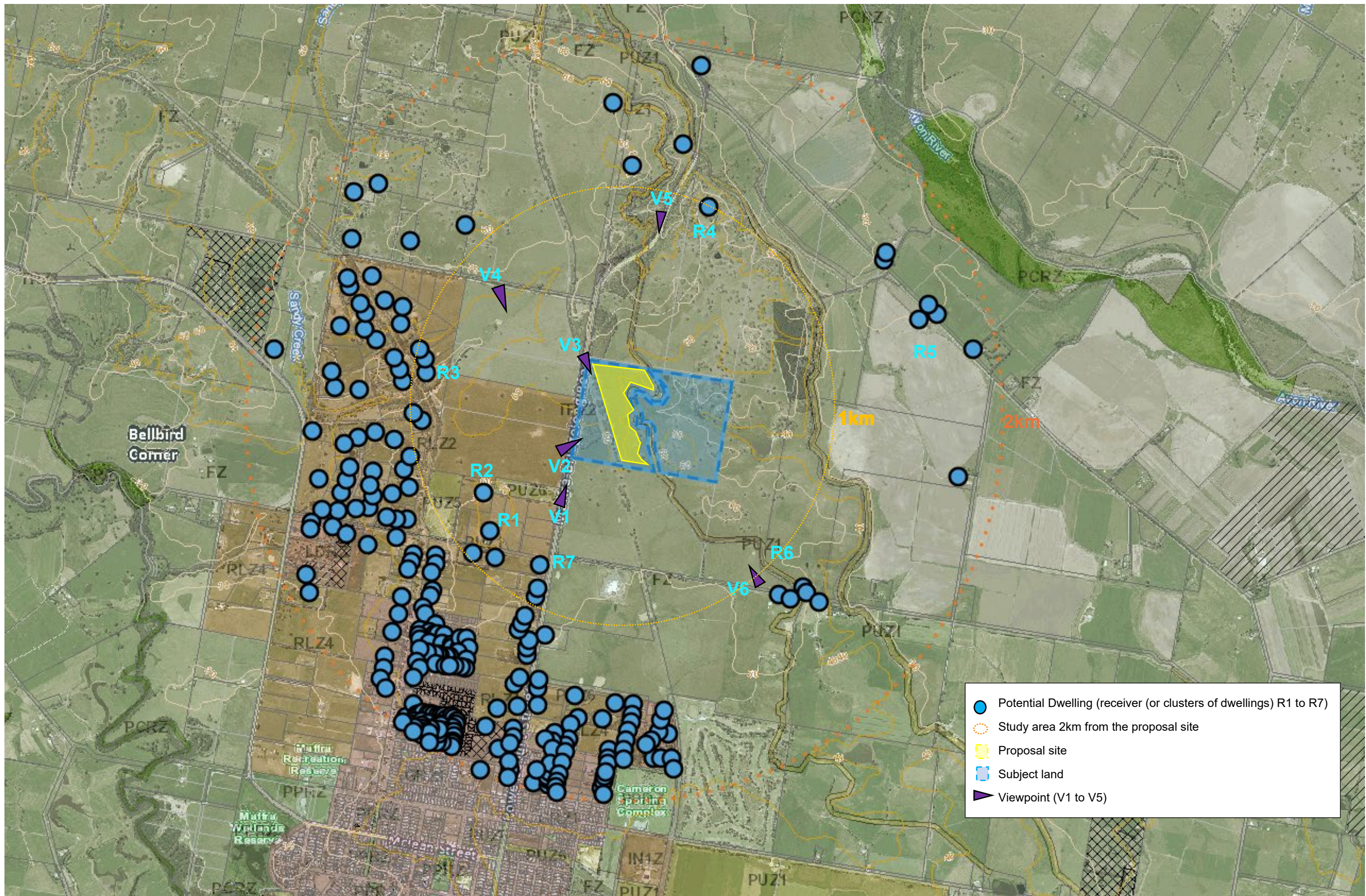


Figure 1-6 Rural dwellings within 2km of the proposal site and viewpoints (photo site and direction) (Source: NGH Adapted from Vic Plan, State of Victoria, 2022)

1.1.6 Definition of Landscape Management Zones (visual effect)

Visual Landscape Management Zones (LMZs) were assigned to each representative viewpoint. The zones were derived by combining scenic quality, viewer sensitivity and the distance to the proposal. Combined they produce a three-tiered management hierarchy: A – C, as shown in Table 1-1. The management priority for each viewpoint is listed in Table 2-1.

Table 1-1 Visual Landscape Management Zone decision matrix.

Proximity / sensitivity								
Scenic quality		Fore-ground High	Middle ground High	Back-ground High	Fore-ground Moderate	Middle ground Moderate	Back-ground Moderate	Fore-ground Low
	High	A	A	A	A	B	B	B
	Moderate	A	B	B	B	B	C	C
	Low	B	B	B	B	C	C	C

Each zone has associated objectives to guide management of visual change and to help evaluate proposed project impacts. These are shown in Table 1-2.

Table 1-2 Visual Landscape Management Zone management objectives.

Management priority	Management objectives
A	<p>Maximise retention of existing visual amenity.</p> <p>Landscapes are least able to absorb change. Developments may lead to a major change.</p>
B	<p>Maintain existing visual amenity, where possible.</p> <p>Protect dominant visual features. Developments may be allowed to be visually apparent.</p>
C	<p>Less importance for retaining existing visual amenity.</p> <p>Landscapes can absorb change. Developments may be allowed to dominate but should reflect existing forms and colours where possible.</p>

The management zone and consideration of management objectives for each viewpoint is listed in Table 2-1.

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2. Potential impacts

A VIA for the operation stage of the proposal has been conducted considering:

- The specific elements of the proposal including the site access and internal roads, fencing, lighting, substation/inverter, solar panel array areas, battery system, ancillary shed and landscaping. Associated effects of light spill and dust impacts (that can also result in air quality impacts).
- The potential for the proposal to be viewed from representative viewpoints (receivers and road users).
- The degree of contrast the proposal would have within the identified LMZ. LMZs were assigned to viewpoints based on the results of the field work, and the contrast at that viewpoint was evaluated based on evaluation criteria listed in section 2.1.
- The findings of the Glint and Glare Assessment (MOIR.L.A, 2022), that showed there are 17 free standing dwellings within 1 km of the Project. Based on the desktop assessment no potential “Yellow” glare was found for the residential receptors. Four (4) route receptors were identified as part of the assessment. Based on the glare assessment no potential “Yellow” glare was found for the route receptors from the Project. Vegetation screening present around the proposal site is shown in Figure 2-1.



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Figure 2-1 Screening vegetation mapped for the proposal site (MOIR.L.A, 2022)

2.1 Evaluation criteria

The ratings for the degree of contrast created by the proposal at each viewpoint have the following definitions (U.S. Department of the Interior, n.d.):

- High contrast: the proposal would be dominant within the landscape and generally not overlooked by the observer; the visual change would not be absorbed.
- Medium contrast: the proposed activity would be moderately dominant and noticed; the visual change would be partially absorbed.
- Low contrast: the proposed activity would be seen but would not attract attention; the visual change would be well absorbed.
- Indistinct: contrast would not be seen or would not attract attention; the visual change would be imperceptible.

To determine if the objectives for the visual LMZ's are met, the contrast rating for the viewpoint is compared with the relevant management objectives to give a visual impact level. The visual impact level is consequently defined as:

- High impact: contrast is greater than what is acceptable.
- Medium impact: contrast is acceptable.
- Low impact: visual contrast is little or not perceived and is acceptable.

For high impact viewpoints, mitigation must be considered. Mitigation for moderately impacted receivers is considered on a case-by-case basis. No mitigation is warranted for low impacts.

2.1.1 Evaluation results (resultant visual impact)

Table 2-1 evaluates the expected level of visual impact from the 6 representative viewpoints, V1-V6, representing the rural dwellings and public viewpoints (local roads) within 2km of the proposal site. Figure 2-2 below represents traffic travelling along Maffra-Briagolong Road and the extent of roadside and plantation vegetation providing screening.



Figure 2-2 View north and northeast towards the proposal site from Maffra-Briagolong Road (NGH 2022)

The evaluation in Table 2-1 below considers the existing landscape factors at each viewpoint and potential for views of the proposal site without any mitigation measures, and then considered any

necessary proposed mitigation measures giving the resulting (mitigated) visual impact rating for each viewpoint.

Table 2-1 Visual impacts at representative viewpoints and their associated receivers.

VIEWPOINT 1 (V1) (representing dwellings within Maffra and those located south of the site along Maffra-Briagolong Road – represented by R7)		
Summary of viewpoint		Viewpoint description / impact
Landscape	Urban and rural-residential (large lots) and associated dwellings with garden boundary plantings, gently sloped down to the south, open grazing land and paddock trees. Roadside vegetation.	<p>V1 representing views from dwellings and traffic travelling north towards the proposal site, identified by R7 on Figure 1-6. This viewpoint is located to the south of the subject land on Maffra-Briagolong Road and has an elevation of approximately 50m AHD. This viewpoint is located approximately 1.1km from the solar farm.</p> <p>The topography, buildings and fences, roadside vegetation and paddock vegetation would currently screen all views to the proposal. Additional traffic would be a temporary impact during construction. The proposal would include a management plan that would address traffic management.</p> <p>No specific visual mitigation is necessary.</p>
Scenic quality	Moderate	
Proximity	Middle ground	
Sensitivity	Moderate to Low	
LMZ objective	B to C	
Contrast	Not visible.	
Inherent visual impact	Low.	
Mitigated visual impact	N/A – no mitigation necessary.	

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V1 View from representing dwellings within Maffra and those located south of the site along Maffra-Briagolong Road (near 273 Maffra-Briagolong Road) (Source: NGH, 2022)

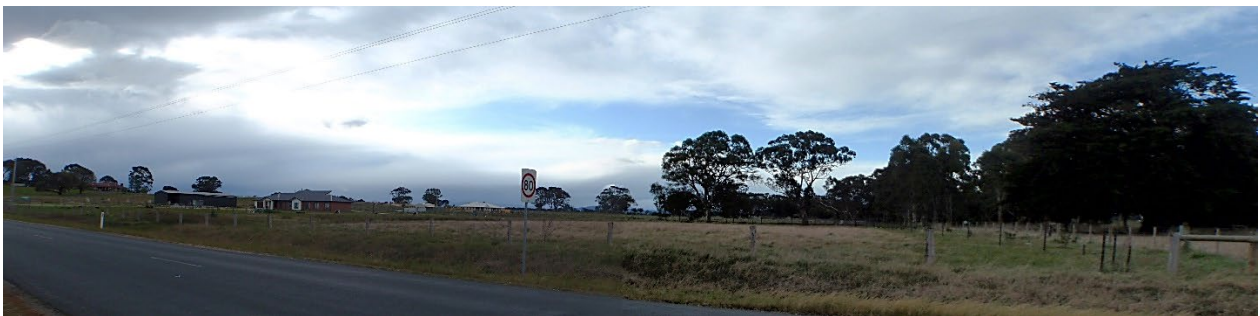
VIEWPOINT 2 (V2) (representing dwellings R1 and R2, and all dwellings along Sandy Creek Road and all dwellings to the southeast and traffic opposite the site along Maffra-Briagolong Road)

Summary of viewpoint		Viewpoint description / impact
Landscape	Rural and associated dwellings with garden plantings, gently sloped (R1 and R2 are on the rise of the hill), open grazing land and roadside and paddock vegetation.	<p>V2 representing views from dwelling R1 and R2 is located to the southeast of the subject land, considering views towards the southern end of the proposal site. The viewpoint is on an elevation of approximately 60m AHD. This viewpoint is located approximately 650m from the solar farm with R1 and R2 further to the southeast at a minimum distance of 850m.</p> <p>There roadside vegetation, plantation vegetation and paddock vegetation would currently partially to fully screen all views to the proposal.</p> <p>The proposal would have low contrast as the colour of trees and shrubs would be a similar (dark) colour to the solar infrastructure providing for good integration and ability of the landscape to absorb impacts from this viewpoint. The proposed shed located in the southwest corner of the proposal site would be light in colour, this would be consistent with the rural character of the site and agricultural buildings (materials, colour and scale) in the surrounding area, for example the building located at 40 Brewers Hill.</p> <p>This viewpoint was assessed as generally having a moderate to low sensitivity due to proximity of dwellings, however, minimal to no view is expected. If there is a view of the proposal, the view duration could be expected to be longer due to the close proximity to the site, however, would</p>
Scenic quality	Moderate	
Proximity	Foreground	
Sensitivity	Moderate to Low	
LMZ objective	B to C	
Contrast	Low to not visible.	

Inherent visual impact	Moderate to Low	be a broken and filtered view. Impacts associated with construction may result in visual impacts including lighting and dust. The proposal would include a management plan that would address lighting location and effects. The lighting would be built to relevant standards controlling light spill.
Mitigated visual impact	Low	



View from V2 located at the entry to the Council storage lot-looking northeast towards the proposal site (Source: NGH, 2022)



View from Sandy Creek Road, showing roadside vegetation and rise in land (Source: NGH, 2022)

VIEWPOINT 3 (V3) (representing dwellings to the west and northwest of the proposal site and traffic using McCubbins Road and Three Chains Road)

Summary of viewpoint		Viewpoint description / impact
Landscape	Rural with associated dwellings with garden and boundary plantings. Gently sloped, open grazing land. Roadside vegetation and woodland.	V3 representing views from dwellings located to the west and northwest of the subject land on an elevation of approximately 60m to 70m AHD. This viewpoint is located approximately 1km from the proposal site. This viewpoint is located approximately 650m from the solar farm with R1 and R2 further to the southeast at a minimum distance of 850m. The roadside vegetation, plantation vegetation and paddock vegetation would currently partially to fully screen all views to the proposal.

Scenic quality	Moderate.	<p>The proposal would have low contrast as the colour of trees and shrubs would be a similar (dark) colour to the solar infrastructure providing for good integration and ability of the landscape to absorb impacts from this viewpoint.</p> <p>This viewpoint was assessed as generally having a moderate to low sensitivity due to proximity of dwellings, however, minimal to no view is expected. If there is a view of the proposal, the view duration could be expected to be longer due to the proximity to the site, however, would be a broken and filtered view. Impacts associated with construction may result in visual impacts including lighting and dust. The proposal would include a management plan that would address lighting location and effects. The lighting would be built to relevant standards controlling light spill.</p>
Proximity	Middle ground.	
Sensitivity	Moderate.	
LMZ objective	B to C	
Contrast	Low to not visible.	
Inherent visual impact	Moderate to Low	
Mitigated visual impact	Low	



V3 View from the northwest (McCubbins Road) towards the proposal site (Source: NGH, 2022)

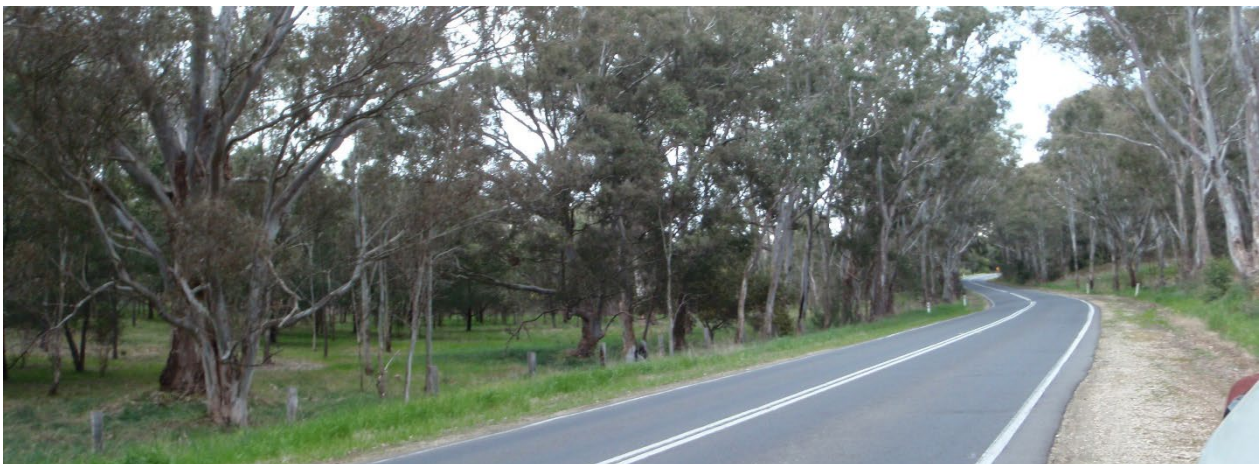


McCubbins Road/Maffra-Briagolong Road intersection looking south (Source: NGH, 2022)

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VIEWPOINT 4 (V4) (representing dwelling R4 and those dwellings north, northeast and east of the proposal site and Maffra-Briagolong Road traffic travelling south towards the proposal)

Summary of viewpoint		Viewpoint description / impact
Landscape	Rural with associated dwellings. Gently sloped down to the north, open grazing land. Roadside vegetation, plantation, and woodland.	<p>V4 represents views from dwelling R4 located to the northeast of the subject land on the same elevation to the proposal site, approximately 60m AHD. A rise in the land is between the proposal site and R4 up to approximately 70m AHD. This viewpoint is located approximately 1km from the solar farm.</p> <p>The topography, buildings and fences, roadside vegetation and paddock vegetation would currently screen all views to the proposal for R4, except for views from the access driveway to R4 and from Maffra-Briagolong Road adjacent to the entry point to the site. There are expected to be minimal impacts due to the speed of travel and use of the areas.</p> <p>The topography would currently screen all views to the proposal for all dwellings north of R4, to the northeast and east.</p> <p>No specific visual mitigation is necessary.</p> <p style="text-align: center;">ADVERTISED PLAN</p>
Scenic quality	Moderate	
Proximity	Middle ground	
Sensitivity	Moderate to Low	
LMZ objective	B to C	
Contrast	Not visible.	
Inherent visual impact	Low.	
Mitigated visual impact	N/A – no mitigation necessary.	



V4 View from Maffra-Briagolong Road north of the proposal site (Source: NGH, 2022)



Proposed site entry point location - located in the northwest corner of the proposal site (Source: NGH, 2022)

VIEWPOINT 5 (V5) (representing dwellings at R6 located along Brewers Hill Road)

Summary of viewpoint		Viewpoint description / impact
Landscape	Rural with associated dwellings with garden and boundary plantings. Flat and sloped land down to the Avon River, open grazing land with paddock trees.	<p>V5 represents views from dwellings to the southeast of the proposal site, this area is lower than the proposal site, on an elevation of approximately 50m AHD.</p> <p>The topography and paddock vegetation would currently screen all views to the proposal site.</p> <p>No specific visual mitigation is necessary.</p> <p style="text-align: center; color: red; font-weight: bold; font-size: 1.5em;">ADVERTISED PLAN</p>
Scenic quality	Moderate	
Proximity	Middle ground	
Sensitivity	Moderate to Low	
LMZ objective	B to C	
Contrast	Not visible.	
Inherent visual impact	Low.	
Mitigated visual impact	N/A – no mitigation necessary.	



V5 View from Brewers Hill Road - Southeast of the proposal site (Source: NGH, 2022)

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3. Results summary

3.1 Low or no residual impact

The area is dominated by open rural land with associated dwellings, woodland, and paddock vegetation. Vegetation and topography prevent some or all views of the site, for most if not all dwellings and road users.

The impacts, post general management and design mitigation, are assessed as Low or no impacts. The proposal is consistent regarding the context of planning scheme policy encouraging renewable energy with *minimal* impact (not ‘no impact’) on amenity, the proposed level of visual impact is considered acceptable.

3.1.1 Potential cumulative impacts

Adverse cumulative impacts occur when the infrastructure or activities at the proposal site exacerbate the negative impacts of other activities occurring nearby. Views from most viewpoints and surrounding land would remain as existing and would be dominated by agricultural land uses and established vegetation.

Even though there is a similar development within 1km of the site, refer to Figure 3-1, there are only minimal cumulative visual impacts due to the minimal and no views to the proposal site from most viewpoints. The most likely cumulative impacts are for road users travelling along Maffra-Briagolong Road. The other closest solar farm approved in the area is over 17km from the proposal site and would have no cumulative visual impacts.

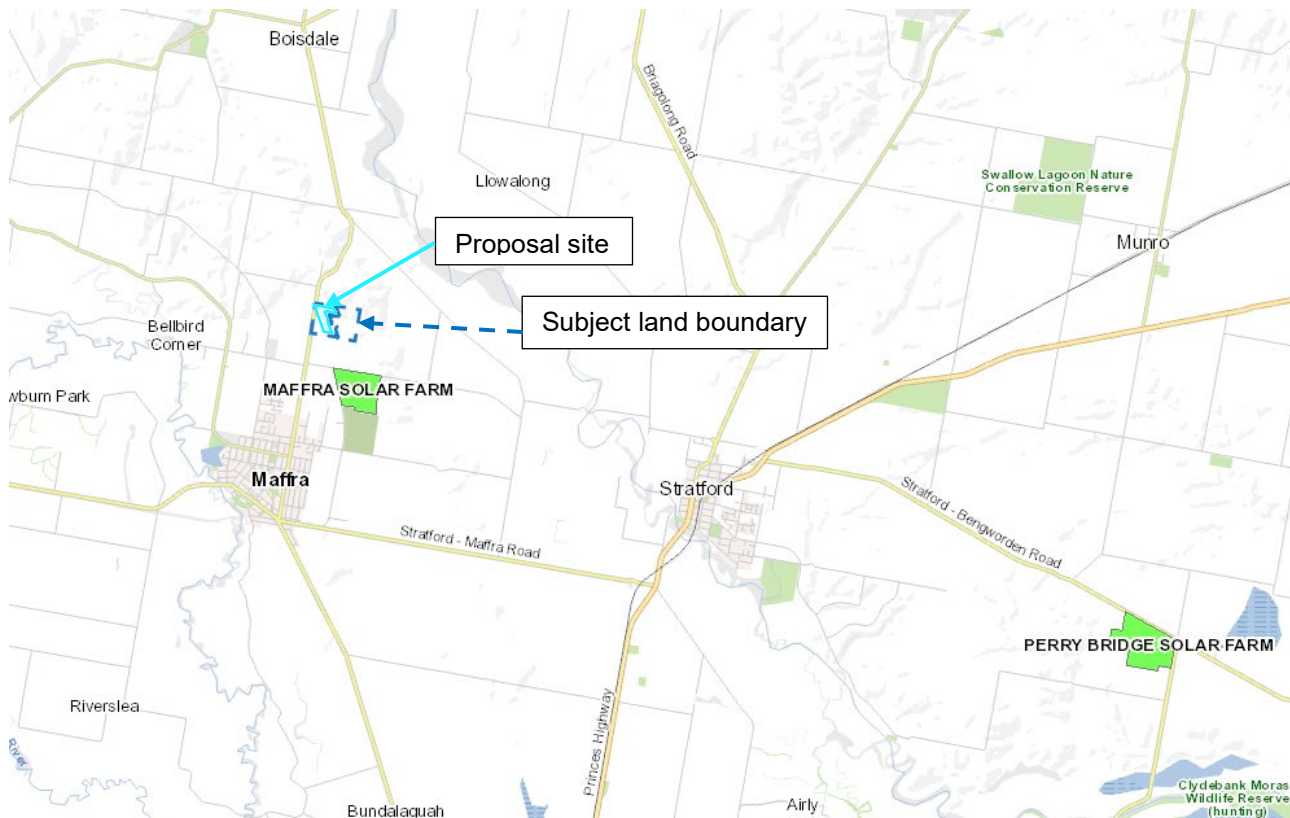


Figure 3-1 Distance to Solar Farms (approved) near the proposal site (Source: VicPlan, 2022)

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3.1.2 Assessment

The proposed Maffra Solar Farm would meet the relevant provisions of the Wellington Planning Scheme, specifically the provisions of clause 53.13 as it relates to protection of amenity and visual impacts associated with the design of the proposal. The proposal would be consistent with the FZ purpose, as they relate to visual impacts, specifically:

- *To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture.*
 - The proposal would not have adverse visual impacts affecting the use of land for agriculture (including changes to the landscape, views, traffic, light spill, and dust). The dwellings within 2km of the proposal site would have reasonable amenity protected through the design of the solar farm and implementation of management plans.

The proposal would also be consistent with the farming zone decision guideline Clause 35.07-6

- *General issues - Whether the site is suitable for the use or development and whether the proposal is compatible with adjoining and nearby land uses.*
 - The proposal would be compatible with adjoining agricultural land uses and associated dwellings as the mitigated visual impact rating is low or no impact.
- *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 proposal has been sited to allow for best screening by existing vegetation.
 - The proposal is compatible with surrounding developments as the height is minimised, the scale of the solar farm is a small utility scale, the topography minimises potential views to a few receivers, the colours and materials of infrastructure would where possible have low contrast with the existing vegetation.
 - The management and design measures would provide for some further integration with the landscape and minimisation and avoidance of potential impacts.

The proposal has been designed to minimise visual impacts consistent with the DELWP guidelines for solar facilities.

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4. Conclusion

This VIA has assessed the potential impacts of the Maffra Solar Farm and Battery Energy Storage System (BESS) (the proposal) at Lot 13\TP23981, Maffra-Briagolong Road, Maffra 3860.

The siting within the lease area, colours and materials to be used, and low and short term road use all minimises the visual effects of the proposal. The siting and existing vegetation minimises visual impacts on the agricultural visual character and natural scenic qualities of the area.

This VIA has determined that the impacts are low to no impact for road users and dwellings within 2km of the proposal site. Within the context of planning scheme policy encouraging renewable energy with *minimal* impact (not 'no impact') on amenity, the proposed level of visual impact is considered acceptable.

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