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Prepared for Avenis Energy

Planning Report

Winton BESS

February 2026

Project Number: 230795

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Acronyms and abbreviations

AH Act	<i>Aboriginal Heritage Act 2006</i>
AH Regulations	<i>Aboriginal Heritage Regulations 2018</i>
ACHS	Areas of cultural heritage sensitivity
BESS	Battery energy storage system
CEMP	Construction environmental management plan
CHMP	Cultural heritage management plan
CMA	Catchment management area
DCCEEW	Department of Climate Change, Energy, the Environment and Water (Cwth) (formerly DAWE)
DTP	Department of Transport and Planning
DBPA	Designated Bushfire-Prone Areas
EES	<i>Environmental Effects Act 1978</i>
EPA Act	<i>Environment Protection Act 2017</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cwth)</i>
EVC	Ecological vegetation class
FFG Act	<i>Flora and Fauna Guarantee Act 1988 (Vic)</i>
FZ	Farming Zone
ha	hectares
km	kilometres
LGA	Local government area
m	metres
MW	Megawatt

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MWh	Megawatt hour
MNES	Matters of national environmental significance
P&E Act	Planning and Environment Act 1987
PMST	Protected matters search tool
sqm	Square metres
The native vegetation guidelines	Guidelines for the removal, destruction or lopping of native vegetation
TRZ	Transport Zone
VPO	Vegetation Protection Overlay
VIC	Victoria

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Executive summary

Overview

This Planning Report has been prepared for AE BESS 10 Pty Ltd as trustee of AE BESS 10 Unit Trust (AE BESS 10) (the Proponent) to accompany a planning application for a battery energy storage system (BESS) project in northeast Victoria, approximately 14km north-east of the township of Benalla.

Avenis Energy seeks to develop a commercial scale BESS of 120MW / 480 MWh (**the Project**) in the locality of Winton, which is within the Benalla local government area (LGA). The Project is referred to as the Winton BESS.

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Site and Surrounds

The subject site that will host the BESS compound is located at 6 Bowers Road, Winton VIC 3673, and comprises two land parcels known as Lot 1 of title document TP98336, and Lot 1 of title document TP98337. The proposed use and development of the land is to be contained within Lot 1 of TP98336, with underground cabling extending toward AusNet Glenrowan Terminal Station to the south-east across road reserves and both Council and State roads into the terminal station.

The proposed underground cable route has an approximate length of 1.3km. The underground cable route is proposed from the south-east section of the site at a width of 20m, beneath the Hume Freeway, and extending along the Municipal roadside area between the Hume Freeway and Winton-Glenrowan Road. The cable route then crosses underneath Winton-Glenrowan Road where it increases in width to 40m, before entering the AusNet Glenrowan Terminal Substation.

Whereas the project has investigated an underground cable route corridor of 20m and 40m respectively, the project will aim to minimize impact to local vegetation during the design, construction and operation of the underground cable.

The AusNet Glenrowan Terminal Station comprises two land parcels, known as Lot 1 of title document TP345760 and Lot 1 of title document TP381841. The station includes a 220kV switchyard, 66kV switchyard, and two 220/66/22kV transformers. Substation augmentation works within this terminal station onto an existing bay are required to accommodate the connection of the project, as detailed further below.

The characteristics of the surrounding land are consistent with that of the subject site, being primarily undulating farmland. Single farm dwellings on lots in the surrounding area are common to the east and west of the site, with approximately 12 dwellings located within a 2km radius.

The Winton Wetlands is located to the north of the site, while the Winton Solar Farm is located to the south along Winton-Glenrowan Road. Additionally, the Mokoan Solar farm, which has recently completed construction in 2024, is located directly to the east of the subject site.

The Project

The Project includes a proposal for a commercial scale 120MW / 480MWh BESS located in the north-eastern portion of the subject site, with connection provided to the AusNet Glenrowan Terminal Station via a new 66kV underground cabling.

Planning Framework

In Victoria, a BESS of this scale is defined as a “utility installation” under Clause 73.03 (Land Use Terms) of the Victorian Planning Provisions. Pursuant to Clause 35.07 of the Benalla Planning Scheme, a permit is required for the use and development of land for a utility installation within the Farming Zone.

Clause 53.22 Significant Economic Development seeks to prioritise and facilitate the planning, assessment and delivery of projects that will make a significant contribution to Victoria’s economy and provide substantial public benefit, including jobs for Victorians. The main effect of Clause 53.22 is that the application is exempt from the decision requirements of sections 64(1), (2) and (3) and the review rights of sections 82(1) of the Act. This Project will be lodged via the Development Facilitation Pathway.

There are several additional permit triggers for the Project, including for the removal of native and planted vegetation on the site, for creating access to a road in a Transport Zone 2, and for buildings and works associated with underground cabling/connection infrastructure within the Transport Zone.

It is noted that the proponent intends to seek approval via a separate planning application for the subdivision of the lots to realign the lot boundaries, where a re-subdivision of the existing lots is proposed, and the number of lots (2) is not increased. This application would be submitted to Benalla Rural City Council.

The various provisions of the Benalla Planning Scheme and relevant Guidelines have been taken into consideration in designing and assessing the Project.

Assessment of the Proposal

For the reasons outlined further within this report, the Project is assessed to be consistent with the objectives of planning in Victoria that are set out in the Planning and Environment Act 1987. In particular, this includes the fair, orderly, economic and sustainable use, and development of land; protection of natural resources; as well as balancing the present and future interests of all Victorians.

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Further, the Project will contribute to meeting the long term and interim greenhouse gas emissions reduction targets of the Climate Action Act 2017 by charging and discharging from other renewable energy sources in Victoria. The decision on the Project should therefore appropriately take into consideration the stated storage targets for Victoria.

Finally, the Project will contribute to meeting Victoria’s storage targets of at least 2.6 GW of energy storage capacity by 2030, and at least 6.3 GW by 2035, as legislated. The Project will not result in emissions such as waste or environmental impacts. Further discussion relating to environmental and amenity impacts associated with the proposal is provided in the following sections of this report, and within the accompanying specialist report and assessments.

Environment

An ecological assessment has been undertaken by Biosis and is included in Appendix D. A permit is triggered under Clause 52.17 of the Benalla Planning Scheme for the removal of native vegetation at the site.

The proposal includes the removal of 0.646 Hectares of native vegetation, including two large tree. The strategic biodiversity value score of the native vegetation proposed for removal is 0.360 to 0.580.

Assessment of the project against the individual and combined potential effects criteria based on the level of proposed native vegetation removal, EVC bioregional conservation status, impacts on FFG Act listed species

and impacts on wetlands indicates the project is unlikely to trigger a referral to the Minister for Planning for an EES determination.

Through a sensitive design and siting of the proposed BESS, the removal of native vegetation has been avoided and minimised where possible.

As noted in the ecological report, any offset requirements can be accommodated via the purchasing of suitable offset credits within the Goulburn Broken Catchment Management Authority, or the Benalla Municipal District.

The assessment details the measures taken throughout the design and development of the project to minimise the impacts on biodiversity and native vegetation and considers the proposed removal of native vegetation necessary for the delivery of the BESS, and connection infrastructure to the Glenrowan Terminal Station.

The assessment concludes that the project, and the proposed removal of native vegetation, is unlikely to present any significantly ecological impacts. The report also includes several recommendations to manage, protect, and mitigate any potential impacts to retained vegetation during the construction phase of the project.

Landscape

A Landscape and Visual Impact Assessment has been prepared by GbLA and is included in Appendix E. A Landscape Masterplan has also been prepared which includes landscaping which acts as vegetative screening for the Project.

The photomontages contained within the report are conceptual visualisations of the proposed BESS and infrastructure with associated landscape screening. The depicted landscape screening represents a potential future state, approximately 5 years after the completion of the soft landscaping.

Five photomontages have been prepared and show that the visual impact of the proposal from surrounding private and public realm viewpoints will be low.

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Noise Impacts

A Noise Impact Assessment has been prepared by Marshall Day Acoustics, and is included in Appendix F.

The report describes the methodology used for the noise assessment, and assesses the project in accordance with the requirements of the Environmental Protection Act and other relevant Victorian noise policy.

The primary noise sources for the development will be from the battery unit, inverters and transformers. The noise control measures for the project, described in the report, include proprietary battery and inverter at-source noise mitigation (noise control kits) and noise barriers.

The equipment may run all together during any time period over 24 hours. The nearest noise sensitive receivers are located at 21 Bowers Road (approximately 180m from project boundary), 576 Winton-Glenrowan Rd (approximately 420m from project boundary), and 84 Glenwest Lane (approximately 1,200m from project boundary). The predicted noise level at the nearest sensitive receiver (21 Bowers Road) is 32dB, being below the night period noise limit, and project target of 34dB.

The noise criteria for this assessment are in accordance with the EPA Noise Protocol and apply to each sensitive receiver based on the zoning information. It is noted that the subject site and nearest dwellings are all in the Farming Zone.

The noise assessment has also considered potential cumulative noise impacts from other noise sources on the surrounding area, including the adjoining renewable energy projects/facilities.

The report concludes that predicted noise levels from the project are below the EPA noise protocol limits for day, evening and night periods. The assessment is considered conservative on the basis that it is unlikely that all equipment will run simultaneously during the night-time period.

Fire Risk

A Risk Management Plan (including a Fire Safety Study) has been prepared by Fire Risk Consultants and is included in Appendix H. The RMP has been prepared in accordance with the Design Guidelines and Model Requirements for Renewable Energy Facilities v4.4 (2023, updated 2025) (CFA Guidelines) and has been developed to support this planning application.

It is noted that a more detailed analysis will occur via an updated RMP following confirmation of a battery supplier for the project. The Risk report acknowledges the BMO and Bushfire Prone Areas as legislative controls in Victoria that regulate planning and building systems. The report then goes on to provide a Risk Assessment, which is a key requirement imposed on the development through any planning permit.

The CFA Guidelines outline the types of hazards that may need to be considered in relation to BESS infrastructure at the design, construction and operational phases. The report also provides an assessment against the CFA Guidelines which outline requirements to address the risk within renewable energy installations and align to the likely planning permit conditions recommended by the CFA. There will likely be a requirement for a Fire Management Plan which will outline detailed requirements for the provision and maintenance of fire management treatments.

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Traffic

A Traffic Impact Assessment has been prepared by Impact Traffic Engineers and is included in Appendix G. The assessment outlines that access to the BESS site is afforded from Bowers Road and Lee Road for all construction and staff movements. The report includes swept path analysis for the relevant proposed BESS site entry locations, which demonstrate safe entry and egress for vehicles can be achieved.

Additional construction traffic is expected to access AusNet Glenrowan Terminal Station and Hume Freeway and Winton-Glenrowan Road reserves, for the proposed works within the Glenrowan Terminal Station lot, and the underground cabling works. It is noted that expected construction traffic volumes associated with these works is expected to be minor, and would not generate significant additional traffic impacts.

A detailed car park design has yet to be determined, however it is assumed that during construction, vehicles will be parked either at designated laydown areas, storage locations, or where construction activities are occurring. The report notes that during operations, operational and maintenance staff vehicles will be accommodated on-site within a vehicle parking area.

The report recommends that a detailed Traffic Management Plan (TMP) be prepared once the project design is complete and prior to commencement of the project construction to confirm the requirements, particularly for sight distances and for mitigation / management works. The report notes that due consideration is required to manage construction traffic and access requirements for the project and nearby renewable energy projects/facilities, particularly with respect to the Winton Energy Reserve 1 Facility, which is expected to commence construction in 2026.

Agricultural Land

An agricultural assessment report has been prepared by Meridian Agriculture and is included at Appendix J. The Report outlines that the subject land is primarily used for grazing. The soil within the site is classed as 'moderate fertility' soils, as the land is susceptible to waterlogging, which limits productive capacity.

The assessment concludes that the proposal will have no long-term adverse impacts on the agricultural capability of the land or that of the neighbouring land, and presents no detrimental impacts to the overall productivity of the region. Additionally, any loss of agricultural productivity that would occur during the construction stage of the project is considered to be negligible.

Signage

The proposed signage is to be located on the front fence/gate. The main site access gates will display a business identification sign with a total area not exceeding 3sqm. The signage shows the Avenis business name and logo, with some information. The proposed signage is appropriate for the development, will not impact on any views or vistas, is discrete and purely for basic business signage.

Energy

Clause 19.01-1S 'Energy supply' has the objective to facilitate appropriate development of energy supply infrastructure in rural areas. The Project is assessed to accord with the direction of this Clause, including relevant strategies to support the development of energy generation infrastructure (including storage) to transition to a low-carbon economy, develop appropriate infrastructure to meet community demand for energy services, ensure energy generation projects are resilient to the impacts of climate change, support energy infrastructure projects in locations that minimise land use conflicts and that take advantage of existing resources and infrastructure networks, and facilitate energy infrastructure projects that help diversify local economies and improve sustainability and social outcomes.

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Provisions of central importance to this permit application include clause 19.01-2S (Renewable Energy), which has the objective to support the provision and use of renewable energy in a manner that ensures appropriate siting and design considerations are met, whilst 19.01-2R (Renewable Energy – Hume) contains a strategy to create renewable energy hubs that support co-location of industries to maximise resource use efficiency and minimise waste generation.

Community Engagement and Benefit Sharing

The Proponent is committed to both community engagement and benefit sharing for this project. A Community Engagement Strategy and reporting has been prepared for the project and is included in Appendix K. The outcome of this assessment includes recommendations on how to continue developing positive relationships for the Proposal as it progresses through to the Development Application and Statutory Notice period.

Conclusion

The proposed Winton BESS has been assessed against the relevant provisions of the Benalla Planning Scheme, with specific reference to Clause 35.07 (Farming Zone), Clause 36.04 (Transport Zone), Clause 53.13 (Renewable Energy Facility) and the applicable guidelines for energy facilities. The balance of policies strongly supports the BESS at the proposed location.

1. Introduction

This report has been prepared for AE BESS 10 (the Proponent) to accompany a planning application for a battery energy storage system (BESS) project in northeast Victoria, approximately 14km north-east of the Benalla township.

Avenis Energy seeks to develop a commercial scale BESS of 120MW / 480 MWh (**the Project**) in the locality of Winton, which is within the Benalla local government area (LGA). The Project is referred to as the Winton BESS.

The Project includes the BESS to be located in the north east portion of the lot. There is access to the BESS area from both Lee Road to the north and Bowers Road to the west. An underground cable route with an approximate length of 1.3km is proposed to connect the BESS to the AusNet Glenrowan Terminal Substation. The underground cable route is proposed from the south-east section of the site at a width of 20m, beneath the Hume Freeway, and extending along the Municipal roadside area between the Hume Freeway and Winton-Glenrowan Road. The cable route then crosses underneath Winton-Glenrowan Road where it increases in width to 40m, before entering the Glenrowan Terminal Substation.

Whereas the project has investigated an underground cable route corridor of 20m and 40m respectively, the project will aim to minimize impact to local vegetation during the design, construction and operation of the underground cable.

Additionally, augmentation works, including the construction of a new 66kV Bay, are proposed to the Glenrowan Terminal Substation to allow for the connection of the BESS.

Amendment VC279, which was recently gazetted on 21 August 2025, changed the land use definition of 'Minor utility installation' in the Victoria Planning Provisions and all Planning Schemes to ensure the appropriate planning assessment of large battery storage systems. Pursuant to Clause 73.03, the definition of a Minor utility installation now includes 'a battery with a storage capacity of no more than 5 megawatts'.

As such, the applicable land use for the Winton BESS is that of a 'utility installation' which requires a permit for the proposed use and development under the Farming Zone. While Amendment VC279 came into effect after lodging the pre-application for the project, it is noted that the provisions, requirements, and decision guidelines of the Farming Zone have been considered and addressed in this planning report, and the accompanying specialist assessments.

This report describes the project, site and surrounds and outlines the relevant planning provisions and guidelines applicable to the project. A detailed planning assessment is provided against the relevant provisions of the Benalla Planning Scheme.

1.1. The Site and Surrounds

1.1.1. The Site

The proposed BESS site is located at 6 Bowers Road, Winton VIC 3673, which comprises two land parcels known as Lot 1 of title document TP 98336, and Lot 1 of title document TP98337. The proposed use and development of the land associated with the proposed BESS is to be contained within Lot 1 of TP98336, with

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connection infrastructure extending across State and Council roads and reserves then into the AusNet Glenrowan Terminal to the south-east.

Figure 1-1 shows the proposed project area, with the extent of the project land outlined in red. Details of the land included within the project area is provided in Table 1-1 below.

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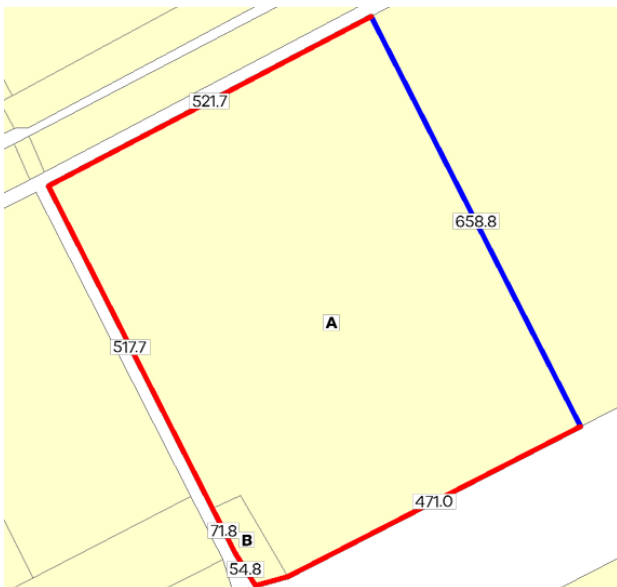
Figure 1-1 Project Area

Table 1-1 Project Land

Address	Land Description	Existing/proposed Land use
6 Bowers Road, Winton	Lot 1/TP98336 Lot 1/TP098337Y	Proposed BESS Site
Road Reserves	<ul style="list-style-type: none"> - Road casement area, comprising a section of the Hume Freeway, Winton-Glenrowan Road, and the Municipal roadside in between Winton-Glenrowan Road and Hume Freeway as shown in Figure 1-1. - Bowers Road road reserve, adjoining the proposed site access point - Lee Road road reserve, adjoining the proposed site access point 	Proposed cable route land and proposed site access points.
17 Glenwest Lane, Winton	Lot 1/TP345760 and Lot 1/TP381841	Glenrowan Terminal Station

The proposed BESS lot is shown in Figure 1-2 below, with the corresponding title descriptions for each lot. The site dimensions and lot descriptions of the Glenrowan Terminal Station are shown in Figure 1-3.

Please note that dimensions are approximate.

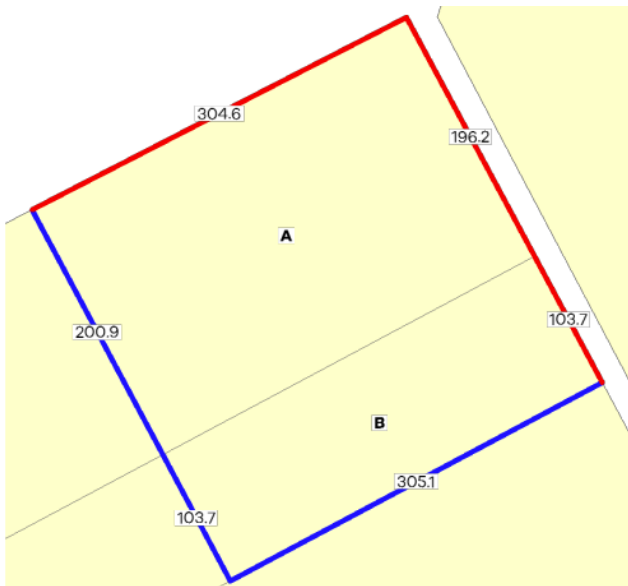


	Lot/Plan or Crown Description	SPI
A	Lot1 TP98336	1\TP98336
B	Lot1 TP98337	1\TP98337

Figure 1-2 Legal Description of 6 Bowers Road, Winton

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	Lot/Plan or Crown Description	SPI
A	Lot 1 TP345760	1\TP345760
B	Lot 1 TP381841	1\TP381841

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Figure 1-3 Legal Description of AusNet Glenrowan Terminal Station

The total land area for both lots within the BESS site at 6 Bowers Road is approximately 36.45 hectares. The land is relatively flat, with a slight fall to the north-west, and is currently used for grazing sheep and cattle. The project area also includes 21.25 hectares of road reserves, adjacent to the subject site, associated with the proposed cable route to the substation. The total site area of the Glenrowan Terminal Station, including both lots, is approximately 9.21 hectares.

The subject site is primarily comprised of grazing paddocks, with associated internal farm tracks and fencing. Additionally, there are several small water bodies around the site, and established trees and vegetation mostly located along the site boundaries adjoining Hume Freeway, Bowers Road, and Lee Road. There are railway sleepers located in the north-west corner of the site, which are the subject of their removal between VicTrack and the Environment Protection Agency (EPA). The features of the site are detailed in Figure 1-5 below.

The farm dwelling is located in the south-west portion of the site, along the Bowers Road frontage, and within Lot B as shown in Figure 1-2 above. There are also several sheds/outbuildings located within Lot B, directly to the north of the dwelling.

The existing dwelling and associated outbuildings at 6 Bowers Road are proposed to be demolished prior to operations commencing, and is therefore not considered a sensitive receiver for the purpose of the specialist assessments undertaken for the project.

The proposed vehicle access points for the project are shown in Figure 1-1, and include:

- Two access points to the BESS site, located on the western boundary of the site on Bowers Road, and the Northern site boundary on Lee Road.
- One access point for construction vehicles into the Glenrowan Terminal Station at the existing site access on Glenwest Lane.
- One access point for construction vehicles required for the underground cabling works at the area of the Hume Freeway Road Reserve opposite the Glenrowan Terminal Station.

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1.1.2. The Surrounds

The characteristics of the surrounding land generally reflect that of the subject site, being primarily undulating farmland and renewable energy projects. Single farm dwellings on lots in the surrounding area are common to the east and west of the site, with approximately 12 dwellings located within a 2km radius.

The Winton Wetlands is located approximately 2km north of the site, separated by two roads and a rail corridor. The wetlands area is within the Public Use Zone, and is bounded by an area of vegetated land within the Public Park and Recreation Zone to the South.

The Winton Solar Farm is located to the south along Winton-Glenrowan Road, while the Glenrowan and Glenrowan West Solar Farms are located to the east.

Additionally, the Mokoan Solar farm (1 and 2), which have recently completed construction, is located directly to the east of the subject site. The approved Winton Energy Reserve 1 Facility is located to the west of the site.

There is an established road network in the surrounding area, which includes the Hume Freeway directly to the south of the site.

The aerial images in Figure 1-4 and Figure 1-6, as well as the Feature and Level Survey in Figure 1-5 below show the subject site and surrounding context.



Figure 1-4 Aerial view of the proposed BESS site

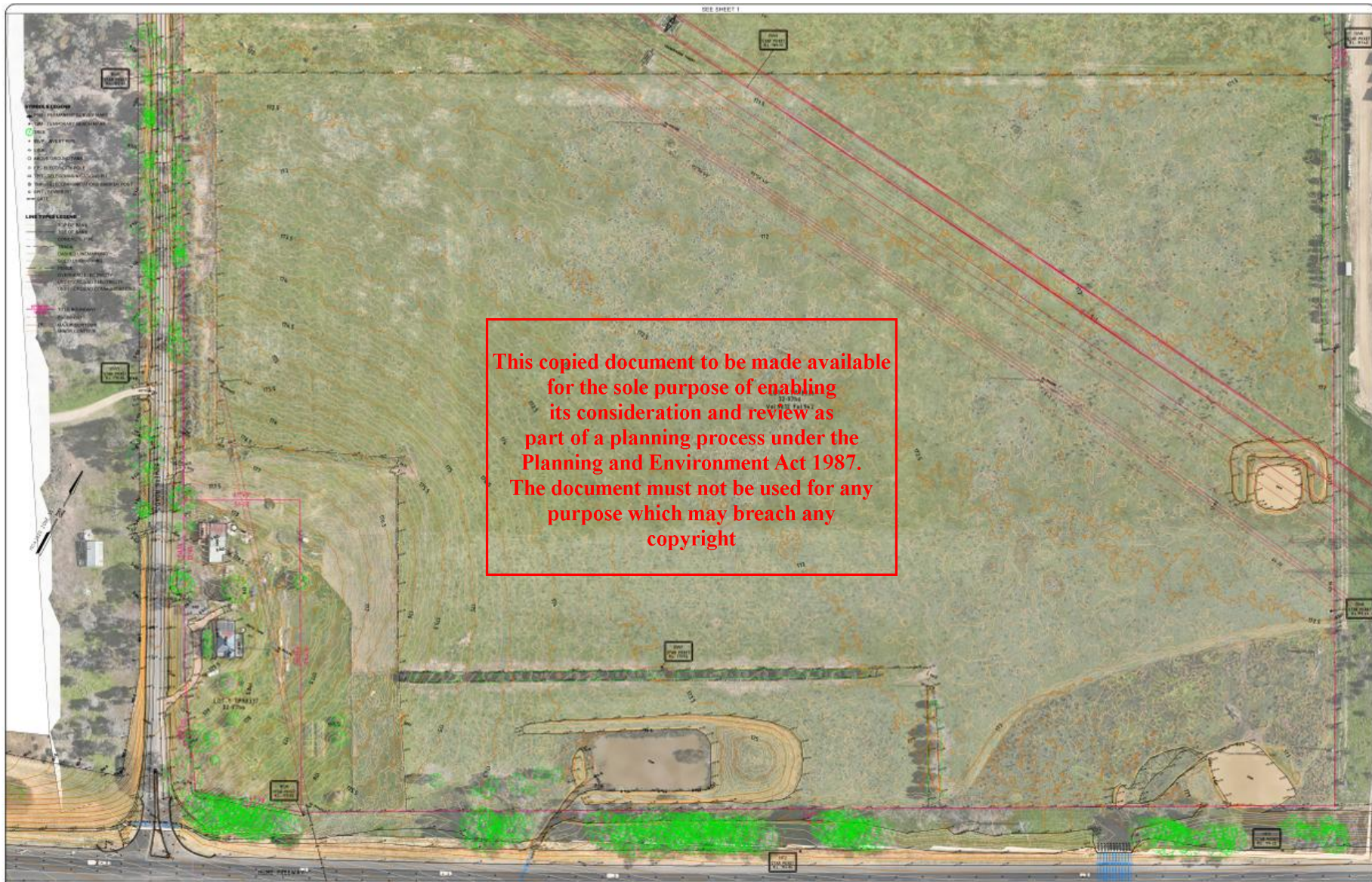


Figure 1-5 Boundary Re-establishment and Feature & Level Survey (Beveridge Williams, 2025)

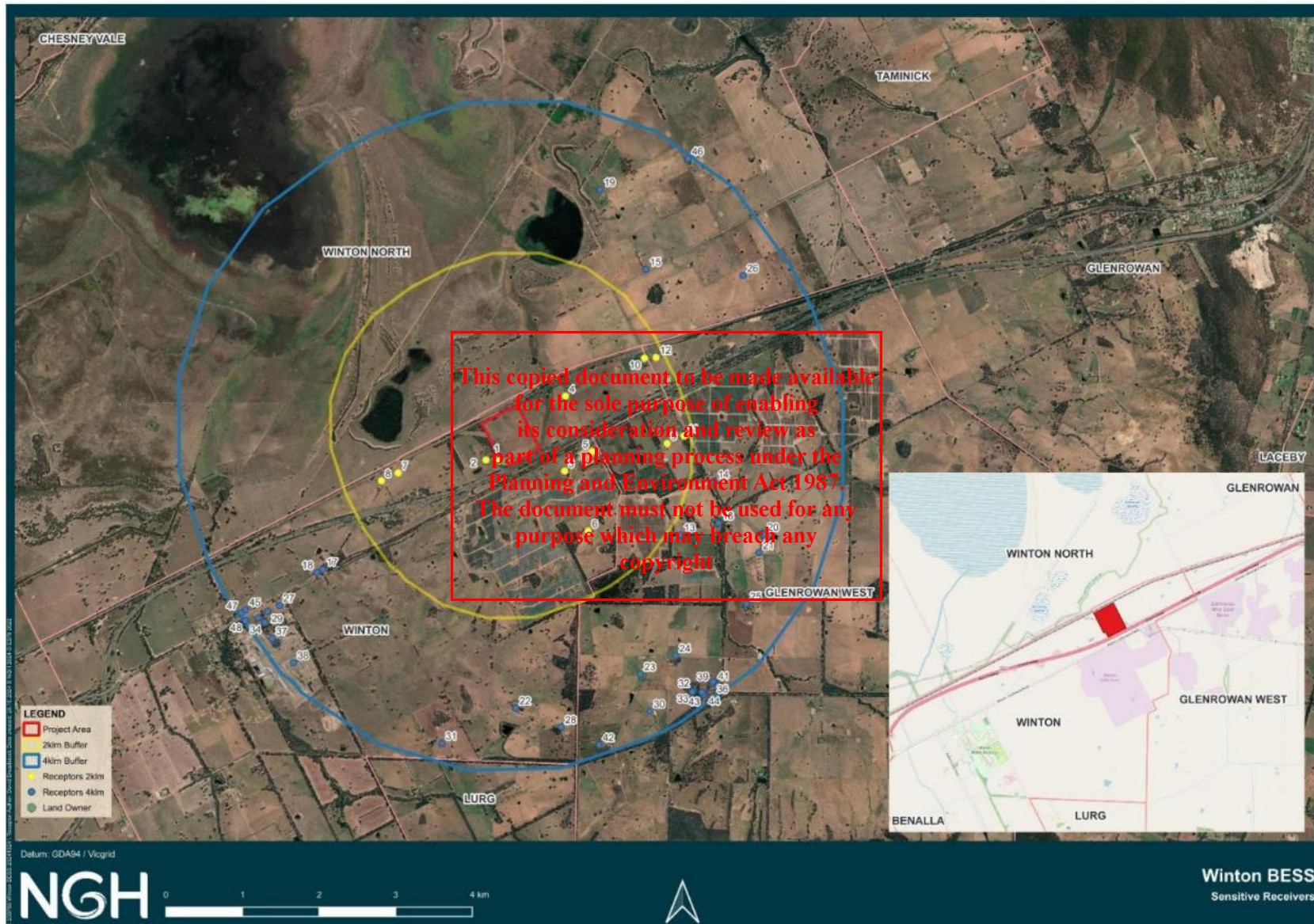


Figure 1-6 Non-involved receivers within 2km and 4km of the subject site

As shown in Figure 1-6, there are approximately 12 non-involved receivers within a 2km radius of the subject site, inclusive of residential and non-residential receivers.

The siting and design of the Project, as well as the assessment provided in this report and the accompanying specialist reports has taken into consideration the location and type of the receivers within a 2km and 4km radius of the site.

1.2. Renewable Energy Facilities in close proximity to the subject site

There are several renewable energy facilities which have recently been constructed or approved in the area surrounding the subject site. These are detailed under the corresponding headings below, and have been considered as part of the design process for this project. It is also noted that the potential cumulative impacts of these facilities have been considered in the relevant assessments of the Project.

Mokoan Solar Farm (1 and 2)

The Mokoan Solar Farm 1 and 2 is a 58MW solar project located directly to the east of the subject site. The project includes a site which was initially approved for the project in 2018, and an expansion site which was approved in 2020. The combined site area is 94 hectares, with site access provided via Nelson Road.

The project was acquired by European Energy in 2022, and has completed the construction stage. First power was produced by the Solar Farm in December 2024.

Winton Solar Farm

The Winton Solar Farm is a 185MW solar project located to the south west of the subject site, on the southern side of Winton-Glenrowan Road. Vehicle access to the site is provided directly via a crossover to Winton-Glenrowan Road.

The Solar farm is located adjacent to the Glenrowan Power Station, on a 250 hectare site. The project is currently operational as of 2022. The Solar Farm is owned by FRV.

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Winton North Solar Farm

The Winton North Solar Farm is a 100MW Solar project, with a 100MW / 200MWh BESS, located to the north-east of the subject site. The project timeline includes a construction phase between 2024-2025, and the project expected to be operational in 2025. The solar project is being developed by Marble Energy in association with Dawn Renewables.

Winton Energy Reserve 1 Facility

The Winton Energy Reserve 1 Facility is an approved project by Lochard Energy, located to the west of the subject site at 386 Lee Road, Winton. The project includes an energy generation facility (gas), and several associated utility installations, including a BESS, with connection to the Glenrowan Terminal Station via a 220kV underground transmission line. The construction stage for the Project is scheduled to commence in 2026, with a time-frame of approximately 12-18 months.

Glenrowan Solar Farm

The Glenrowan Solar Farm is a 130MW solar project located to the east of the subject site, on the southern side of Winton-Glenrowan Road and the Hume Freeway. Vehicle access to the site is provided via Winton-Glenrowan Road, onto Chivers Road.

The Solar Farm is connected to the Glenrowan Terminal Substation, with the construction phase of the project having been completed in 2023. The Solar Farm is owned by Pacific Partnerships Energy.

Glenrowan West Solar Farm

The Glenrowan West Solar Farm is a 149MW solar project located to the south-east of the subject site, on the southern side of Winton-Glenrowan Road. Access to the site is provided via Winton-Glenrowan Road, via Eleven Mile Creek Road.

The project is currently operational, with construction and commissioning completed in 2021, and is connected to the Glenrowan Substation. The Solar Farm is owned by WIRGTEN INVEST, and is expected to operate for 30 years.



Figure 1-7 Renewable Energy Facilities in the surrounding area

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2. The Project

The Project seeks to provide a commercial scale BESS located in the north-east portion of the subject site, with proposed connection via a new 66kV underground powerline onto a new 66kV bus at AusNet Glenrowan Terminal Station.

The connection for the BESS to the AusNet Glenrowan Terminal Station involves a new 66kV underground cable which would generally extend from the southern portion of the site, beneath a section of the Hume Freeway, and along the Municipal roadside between the Hume Freeway and Winton-Glenrowan Road, before crossing beneath Winton-Glenrowan Road to connect to the AusNet Glenrowan Substation.

The proposed 66kV underground cable will encroach into the existing 220kV transmission line easement on Lot 1\TP345760. The proponent will consult with AusNet and AEMO as part of the design and construction phase to ensure safety-in-design and construction risks are appropriately addressed and implemented.

This is shown in the project layout plan at Figure 1-1.

The proposal meets the following land use definition of a ‘utility installation’ pursuant to Clause 73.03 (Land Use Terms):

- *Land used to transmit, distribute or store power.*

Main construction access to the BESS site (Lot 1\TP98336) is proposed via Hume Freeway onto Bowers Road. The proposal includes two new access points to the BESS site, one located at the eastern section of the Lee Road frontage, and the second centrally at the Bowers Road Frontage, with the associated new internal accessways providing access to the proposed BESS location.

Additionally, two access points are proposed for the purpose of construction traffic associated with works located within the AusNet Terminal Substation lot and Hume Freeway / Winton-Glenrowan road reserves.

This includes an access point to the road reserve, and an access point to the Terminal Substation as shown on the Layout Plan at Figure 1-1.

The location of these two additional access points was considered due to minimized environmental impact (Hume Freeway and Winton-Glenrowan road reserves) as confirmed in the Fauna and Flora Assessment prepared by Biosis and the calculation of native vegetation removal, and existing access onto AusNet Glenrowan Terminal Station land.

It is anticipated that these proposed access points will be reviewed and finalised in co-ordination with AusNet and other relevant stakeholders as part of a traffic management plan for the project.

A complete set of the development plans are included at Appendix A.

The Project will include:

- BESS infrastructure, comprising;
 - 140 x Batteries units
 - 42 x Inverters
 - 42 x 4.6 MVA Transformers
 - 1 x 150 MVA Transformer
- Civil and structural works associated with the proposed internal access tracks;
- Construction of internal access roads, and access and egress points;

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- Landscaping, including the provision of small to medium sized trees, and understorey shrubs around the BESS infrastructure (with 10m planting buffer);
- On-site 66/33kV substation, including high voltage switchgear, transformer, harmonic filter, lightning protection mast, associated structures, control and protection equipment, and switch and control room;
- Sound walls
- Underground high voltage reticulation cabling (33kV) to provide a connection between the battery modules and inverters to the on-site 66/33kV substation;
- Construction of a new 66kV underground cable between on-site 66/33kV substation and AusNet Glenrowan Terminal Station
- Augmentation works at AusNet Glenrowan Terminal Station, including the construction of a new 66kV bay for the connection of the BESS, with associated civil and earth works, high voltage switchgear, structures, and associated control and protection equipment;
- Permanent Operations and Maintenance Facility;
- Water Storage facility (including firefighting water supply and fire water runoff containment);
- Fire suppressions systems;
- Temporary infrastructure, including construction compound, site offices and amenities, tools and material storage sheds, component laydown and work areas;
- Security Fencing;
- Car Parking, including staff parking and truck parking and unloading; and
- Business identification signage

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Augmentation works within the existing AusNet Glenrowan Terminal Station will be performed by AusNet on behalf of AE BESS 10.

All infrastructure associated with the proposed BESS, including the proposed 66kV underground cable into AusNet Glenrowan Terminal Station will be performed by AE BESS 10 and ownership of these assets will vest in AE BESS 10 during operation of the project.

For the purpose of the assessments provided in this report, and the specialist reports in support of the Project, the following example battery has been used:

- UL1973 - Batteries for Use in Stationary and Motive Auxiliary Power Applications.
- UL9540A - Standard for Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage Systems.
- IEC62619 - Secondary cells and batteries containing alkaline or other non-acid electrolytes - Safety requirements for secondary lithium cells and batteries, for use in industrial applications.

3. Proposed Connection Route

As detailed above, the connection for the BESS to the AusNet Glenrowan Terminal Station involves a new 66kV underground cable which would generally extend from the southern portion of the site, beneath a section of the Hume Freeway, and along the Municipal roadside between the Hume Freeway and Winton-Glenrowan Road, before crossing beneath Winton-Glenrowan Road to connect to the AusNet Glenrowan Substation.

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This section of the report provides further context regarding the chosen underground transmission line connection option for the project, including a review of the alternative options considered, and justification as to why the proposed connection option has been selected.

3.1. Reasoning for proposed route selection

As part of early development, connection options for the project were discussed as part of the mandatory preliminary enquiry with the connecting NSP; AusNet. As part of this process, AusNet advised a direct connection into the AusNet Glenrowan Terminal Substation to be the most feasible connection option. Furthermore, due to the project’s enquired capacity of 120MW, for import and export, connection in the underlaying 66kV network was deemed unfeasible by AusNet - and therefore disregarded.

Following this advice, four potential connection routes were identified which complied with AusNet’s guidance. These are shown in Figure 3-1. The project only considered underground cabling along the whole extent of the proposed powerline to minimize potential ecological impacts and vegetation removal, and to satisfy the preference of Benalla Council and DTP for underground crossing over the Hume Freeway and Winton-Glenrowan Road.

Preferred and selected connection option

- Based on ecological surveys, this route has been identified as having the least amount of impact on the existing native vegetation especially in comparison to vegetation conditions north of Hume Freeway (Route A) and south of Winton-Glenrowan Road (Route C).
- This route allows a direct perpendicular crossing of Hume Freeway and the location of the required entry and exit pits for Horizontal Directional Drilling (HDD) under-boring are deemed most suitable for this crossing location. The proposed HDD locations are shown in Figure 3-1 below.
- The proposed crossing location over Hume Freeway provides the least impact and most flexibility to avoid native vegetation, due to the requirement of an increased cable bending radius to accommodate a single HDD cable.
- The affected 'area' underneath Hume Freeway is deemed to be the smallest of our selected options, especially in comparison to the alternative connection routes A and B, for which a larger bending radius under Hume Freeway is expected.

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For all considered options, a single crossing location of Winton-Glenrowan Road was selected to utilise most 'pre-disturbed' areas.

3.2. Alternative Connection Routes

As detailed above, following early consultant and connection advice provided by AusNet, three potential connection route options were explored in addition to the selected connection route proposed for the project. These options are shown in Figure 3-1.

A summary of the reasoning behind why each connection option was not pursued for the project is provided below, detailing the relevant disadvantages and issues of each route:

Alternative Connection Route A (green):

- This alignment was found to have a significantly greater impact on native vegetation north of Hume Freeway
- Additionally, this route would require a wider cable bending radius to accommodate the necessary engineering and construction (HDD) constraints, which would result in a larger area of disturbance across the Hume Freeway. These factors combined would result in greater impact to DTP's asset and a less favourable environmental outcome.

Alternative Connection Route B (pink):

- Similar engineering and construction constraints as for Yellow Route
- This route crosses private land that is now occupied by the Mokoan Solar Farm. As this land is now under the control of a competing renewable energy project, an easement for the required cable infrastructure for the project is no longer feasible.

Alternative Connection Route C (orange)

- This alignment was found to have a significantly greater impact on native vegetation south of Winton-Glenrowan Road (within the road reserve).
- Alternatively, via private land, despite engagement efforts, the landowner did not wish to grant an easement for the proposed infrastructure, removing this route from consideration.

It is considered that the proposed connection route which has ultimately been selected for the project represents the most feasible option, with the least ecological impacts. The alignment avoids environmentally sensitive areas, minimises native vegetation removal, and significantly reduces disruption to the Hume Freeway using horizontal directional drilling. By drilling perpendicular to the freeway, we can cross DTP's asset in a manner that minimises surface disturbance and avoids long-term operational impacts.

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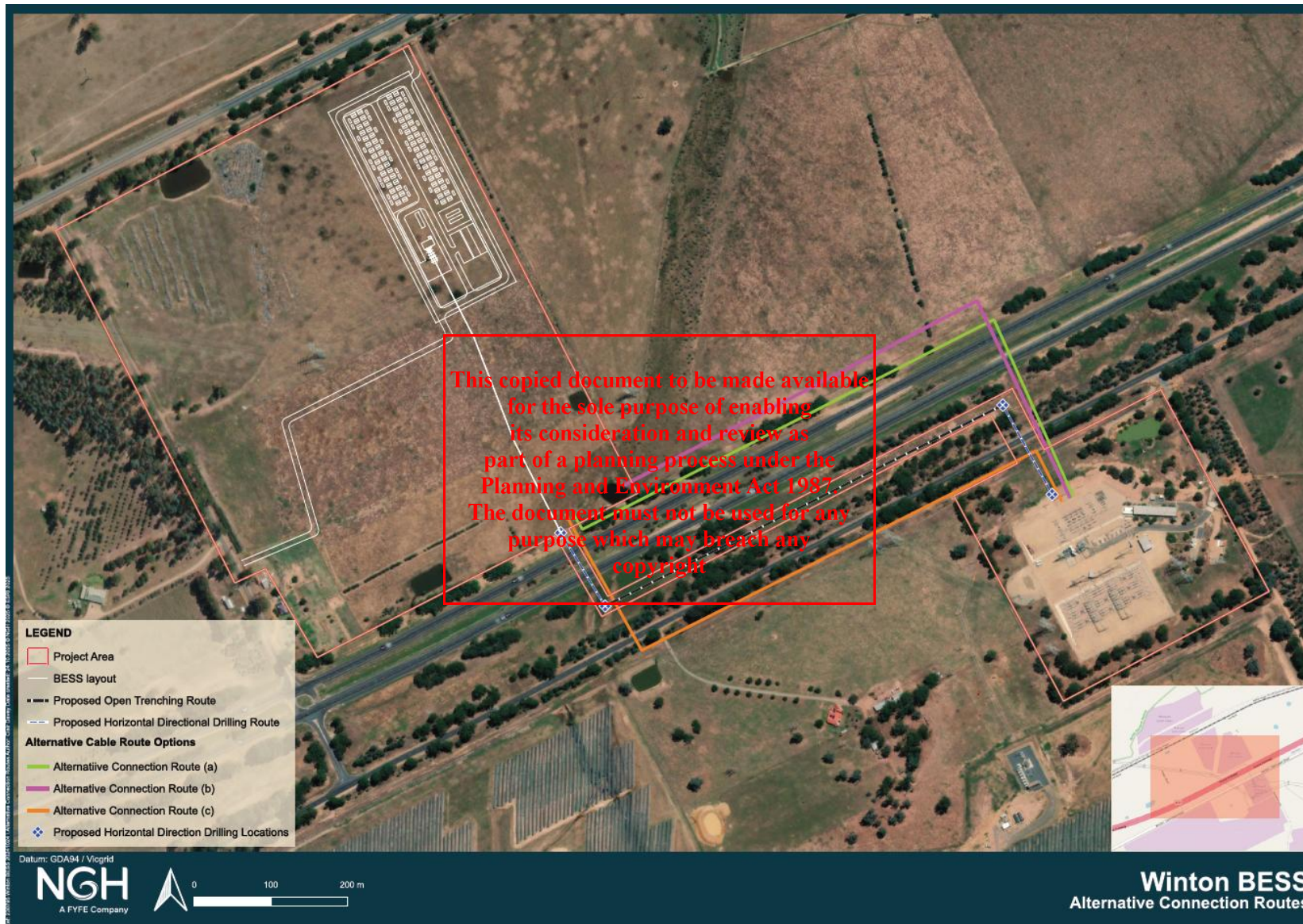


Figure 3-1 Alternative Connection Route Options

3.3. Underground cable construction methodology

The construction methodology and alignment of the proposed 66kV underground transmission line have been specifically designed to minimise environmental impacts and avoid disruption to the Hume Freeway.

Alignment Overview

The entire 66kV connection will be located underground, commencing at the Winton BESS site and terminating within the Glenrowan Terminal Substation boundary. The alignment includes:

- Underground cabling from the Winton BESS site to the northern edge of the Hume Freeway corridor;
- Horizontal Directional Drilling (HDD) adopted for crossings under the Hume Freeway and Winton-Glenrowan Road;
- Open-Cut Trench Installation along the centre of the southern Hume Freeway road reserve;
- Horizontal Directional Drilling for the whole extent of the underground cable route will be investigated during detailed design, aiming to minimize ground disturbance with road reserves.
- Final termination of the underground cable within the GTS compound.
- Designs and installation methods of the required bores and cabling will be in accordance with DTP and Council requirements.

Horizontal Directional Drilling (HDD)

To protect DTP's freeway asset and minimise environmental and traffic impacts, HDD will be utilised for all crossings of the Hume Freeway. This trenchless technique avoids surface excavation and maintains the structural integrity of the road corridor.

Key details include:

- Drill entry and exit pits will be located in the project site and the Hume Freeway road reserve, ensuring no impact to traffic or pavement infrastructure (see Figure 3-1).
- The HDD path will maintain sufficient depth beneath the pavement and subgrade to meet DTP requirements.

This approach ensures minimizing interruption to traffic flow on the Hume Freeway and avoids damage or long-term maintenance impacts to the road asset.

Open-cut trench installation within the road reserve

Following the initial HDD crossing, the cable alignment continues underground via Open-Cut trenching within the southern freeway road reserve. The trenching will occur along the centreline of the reserve, minimising vegetation clearance and avoiding impacts to adjacent landowners.

Trench construction will include:

- Installation of appropriate bedding, conduits or direct-buried cable;
- Marker tape and protection layers;
- Controlled backfilling and surface reinstatement.

All trenching activities will be carried out in accordance with relevant environmental management plans, construction standards, and occupational health and safety requirements.

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The project will investigate the use of HDD for the whole extent of the powerline route as part of the detailed design process prior to construction to further minimise the need for native vegetation removal and impact to the road reserve asset.

Final HDD Crossing and Cable Termination

At the point of entry into the Glenrowan Terminal Substation, a second perpendicular HDD crossing will allow the cable to transition beneath the southern boundary of the reserve and surface within the substation lot. This ensures direct access into the terminal infrastructure with minimal surface disturbance.

Work Area and Laydown Considerations

HDD Entry Point Laydown areas of up to 15 m × 10 m across Hume Freeway and Winton-Glenrowan Road will be required to accommodate the HDD rig and associated equipment required during drilling operations. In addition, a laydown area of 10m × 10 m at the exit point has been considered, excavation of intermediate pits (approx. 2.5m deep x 3.5 m long x 3.0 m wide) for installation of bends between HDD segments. The requirement for intermediate pits will be confirmed during detailed design.

Indicative Staging and Sequencing of Works

The scope of works includes the following:

- Two HDD segments (subject to detailed design confirming cable route being feasible as single HDD segment)
- Open-Trench Installation at HDD ends; i.e. from HDD segment 1 from BESS substation to the Hume Freeway Road Reserve and HDD segment 2 from the Hume Freeway Road Reserve to Ausnet’s Terminal Station (subject to detailed design confirming cable route being feasible as single HDD segment)
- Excavation of intermediate pits for installation of bends between HDD segments
- Final reinstatement and resurfacing

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The proposed sequencing of works is as follows:

1. Service Location – Confirm and mark the location of underground services in accordance with asset owner requirements. Service Location to be performed as part of detailed design and approval process with Third-Party Asset Owners (as required).
2. Site Setup – establish site access, drilling rigs, fluid management system, entry and exit pits, and environmental controls.
3. Open Trenching– excavate trench sections to tie-in HDD segments with the BESS site and the 66 kV terminal station.
4. Intermediate Pits – excavate pits between HDD segments for conduit bends. (as required).
 - a. Approx. dimensions: 2.5 m deep x 3.5 m long x 3.0 m wide.
5. HDD Operations – complete three HDD runs sequentially: pilot bore, reaming, conduit installation, and verification of cover and clearance. Fit conduit bends in the intermediate pits, and test conduit integrity prior to cable pulling.
6. Cable Works – install cables through conduits in bores and trenches.
7. Reinstatement & Resurfacing – backfill pits and trenches to council and landowner requirements and remove drilling fluid residues in line with environmental management procedures agreed with relevant authorities.

- 8. Demobilisation – remove plant, equipment, and temporary works, final site clean-up and handover.

The sequence of works described above is indicative and may be adjusted following further discussions with the HDD contractor and relevant authorities. Certain activities may be undertaken concurrently, or re-ordered, to suit site conditions, project requirements, and approvals, while still ensuring compliance with safety, environmental, and regulatory obligations.

Environmental and Infrastructure Impact Minimisation

The selected alignment and construction method offer a range of benefits in terms of environmental protection and infrastructure management:

- Minimal native vegetation removal, avoiding areas of remnant or sensitive vegetation;
- Minimal disruption to freeway traffic during construction due to the trenchless HDD methodology;
- No pavement cutting or surface disturbance to the Hume Freeway, maintaining the long-term integrity of the road;
- No reliance on private land access or third-party infrastructure, ensuring project certainty and reduced risk.

This route and construction methodology represent the least-impact alternative for connecting the Winton BESS to the Glenrowan Terminal Substation, balancing engineering feasibility, environmental protection, and DTP asset preservation.

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3.4. Transmission line considerations relevant to the transport system

The proposed underground 66kV transmission line from the Winton BESS to the Glenrowan Terminal Substation has been designed to avoid ongoing or long-term impacts on the transport system, particularly the Hume Freeway. However, the following considerations are relevant to the development, operation, and maintenance of both the transmission infrastructure and the transport asset:

Maintenance Access

- All cabling will be located underground with access for future maintenance designed to occur entirely within road reserve areas.
- No maintenance activities will require works on, or access to, the Hume Freeway carriageway.
- Routine inspections and any fault investigations will be managed with minimal surface disruption and in accordance with relevant utility service protocols.

No Surface Infrastructure within the Freeway Corridor

- There will be no above-ground infrastructure (e.g. poles, cabinets, joint bays) located within the Hume Freeway Road Reserve or impacting the sightlines or operational safety of the transport corridor.
- HDD entry and exit pits are located outside the freeway to ensure ongoing safety of the transport system during both construction and future maintenance.

Minimal Traffic Disruption or Road Closures

- Horizontal directional drilling beneath the freeway minimises the need for pavement cutting or lane closures.
- Maintenance access will not require major disruption to freeway operations, ensuring minimal interference with traffic flow or freeway maintenance activities.

Coordination with DTP and Utility Authorities

- the transmission line will be maintained in accordance with the applicable standards and utility service provider requirements.
- Avenis Energy will coordinate with DTP and other relevant authorities if maintenance activities ever intersect with broader road reserve works or upgrades.

Environmental and Infrastructure Protection Measures

- The underground installation ensures reduced exposure to environmental conditions (e.g. wind, fire, vehicle strikes) that typically affect overhead assets, improving reliability and safety.
- All maintenance works will be subject to environmental controls and reinstatement measures to protect adjacent vegetation and infrastructure.

Due to its underground design, use of horizontal directional drilling, and placement outside the freeway carriageway, the transmission line presents no significant ongoing maintenance risks or safety concerns to the transport system. It has been designed to operate independently and with minimal interface with DTP-managed assets, and all future maintenance activities will be contained within road reserves or project-controlled areas, without compromising the development, operation, or safety of the Hume Freeway or surrounding transport network.

For further assessment on any potential impacts of the proposed underground cabling works on the Hume Freeway and surrounding Transport system, please refer to the Assessment Memo prepared by Impact Traffic Consultants, which is provided as an addendum to the Transport Impact Assessment (Appendix G).

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4. Planning and Policy Provisions

4.1. Permit Triggers

A permit is required under the following provisions of the Benalla Planning Scheme:

- **Clause 35.07-1 (Farming Zone)** use of the land for a utility installation (section 2 use)
- **Clause 35.07-4 (Farming Zone)** buildings and works associated with a section 2 use.
- **Clause 36.04-1 (Transport Zone)** use of the land for a utility installation, where the use is not carried out by or on behalf of a relevant transport manager (section 2 use).
- **Clause 36.04-2 (Transport Zone)** for buildings and works associated with the construction of underground cabling within the Transport Zone (TRZ2).
- **Clause 42.02 (Vegetation Protection Overlay)** to remove, destroy, or lop any vegetation specified in a schedule to this overlay (VPO3 – *Regent Honeyeater Habitat/Lurg Ironbark Vegetation Protection Area*).
- **Clause 52.05-2 (Signs)** to construct or put up for display a business identification sign.
- **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.

As noted above, as a result of the change to the land use definition of 'Minor utility installation' following the recent Amendment VC279, the applicable land use definition of the Winton BESS is 'Utility installation, requiring a permit for use and development under the Farming Zone. The Proponent has undertaken studies relating to noise and fire risk as examples, to ensure that the BESS can be located on this site and suitably comply with other legislation and regulations.

This planning report, and the accompanying specialist reports, provide a comprehensive assessment of the project, which includes assessment against the provisions and decision guidelines of the Farming Zone.

Additionally, the proposed BESS location provides setbacks that are well in excess of the following minimum setback requirements specified under the Schedule to the Farming Zone:

- 100 metres from a Transport Zone 2;
- 5 metres from a site boundary; and
- 100 metres from a dwelling not in the same ownership.

The proposal seeks to provide car parking spaces to the satisfaction of the Responsible Authority pursuant to Clause 52.06-6.

4.2. Referrals

We understand the following section 55 referrals apply:

- **Head, Transport for Victoria:** An application under Clause 52.29 (Land Adjacent to the Principal Road Network) must be referred to Head of Transport for Victoria as a determining referral authority, as specified under Clause 66.03.

- **Relevant electricity transmission authority (Ausnet):** An application to construct a building or construct or carry out works on land within 60 metres of a major electricity transmission line (220Kilovolts or more) or an electricity transmission easement, must be referred to the relevant electricity transmission authority as a determining referral authority, as specified under Clause 66.02-4. As noted above, the proposed 66kV underground cable will encroach into the existing 220kV Transmission Line easement on lot 1/TP345760. The proponent will consult with AusNet and AEMO as part of the design and construction phase to ensure safety-in-design and construction risks are appropriately addressed and implemented.
- **Victorian WorkCover Authority:** An application for a utility installation where a fire protection quantity is exceeded under the Dangerous Goods (Storage and Handling) Regulations 2012 (VDGR) must be referred to the Victorian WorkCover Authority as a determining referral authority. The fire protection quantity for lithium-ion batteries is 20 tonnes under the VDGR. The weight of lithium-ion batteries that is proposed will exceed this quantity.
- Secretary to the **Department of Environment, Land, Water and Planning** (as constituted under Part 2 of the Conservation, Forests and Lands Act 1987) (Now DEECA)

4.3. Other Notice

Benalla Rural City Council would be given notice of the application.

Owners and occupiers of nearby land would also be given notice of the application, to be determined by the regulator assessing the planning application.

The CFA are to be given notice of the application.

DEECA and Benalla Rural City Council in their respective roles with interests in the public road would be given notice of the application and a process to update the license/and or facilitate the use of the road for connection infrastructure will occur.

4.4. Zone and Overlay Provisions

Clause 35.07 Farming Zone

The subject land is located within the Farming Zone (FZ). shown in Figure 3-1. The purposes of the FZ are:

- *To implement the Municipal Planning Strategy and the Planning Policy Framework.*
- *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 specified purposes identified in a schedule to this zone*

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Figure 4-1 Zoning Map

Clause 36.04 Transport Zone 2

Part of the subject site along the southern boundary is located within the Transport Zone, where the land directly adjoins the Hume Freeway.

The purposes of the Transport Zone are:

- To implement the Municipal Planning Strategy and the Planning Policy Framework.
- 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.

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Buildings and works associated with a utility installation requires a permit in the TRZ2. Additionally, the use of the land for a utility installation, where the use is not carried out by or on behalf of a relevant transport manager (section 2 use) also requires a permit in the TRZ2. A permit is therefore triggered under the TRZ2 for the use, and buildings and works associated with the underground cabling/connection infrastructure for the BESS, which extends along and beneath a section of the Hume Freeway to the Glenrowan Terminal Substation.

Pursuant to Clause 36.04-3 (Application Requirements) of the Transport Zone, an application by a person other than a relevant transport manager on land within the TRZ1 or TRZ2 must be accompanied by the written consent of the Head, Transport for Victoria.

Accordingly, a letter of consent indicating that Head, Transport for Victoria generally or conditionally consents to the application being made has been obtained and is provided at Appendix L

Clause 37.01 Special Use Zone – Schedule 4 (SUZ4)

The SUZ4 relates to the Glenrowan Terminal Station Facility.

The purpose of the zone is to provide for the future use and development of the Glenrowan Terminal Station Facility, and to ensure that use and development of the land does not adversely impact upon the operation of the Terminal Facility.

No permit is required for buildings and works associated with a Section 1 use, which includes Utility installation. As such, there is no permit requirement for the proposed augmentation works to the Ausnet Glenrowan Terminal Station, detailed under Section 2 of this Report.

Notwithstanding, it is considered that the proposed works are consistent with the purpose of the SUZ4.

Vegetation Protection Overlay – Schedule 3 (VPO3)

There are no Overlays which directly affect the Subject site. However, as shown in Figure 3-2 below, the VPO3 affects an area of land to the south and east of the subject site along the Hume Freeway – where part of the underground cabling works is proposed to occur.

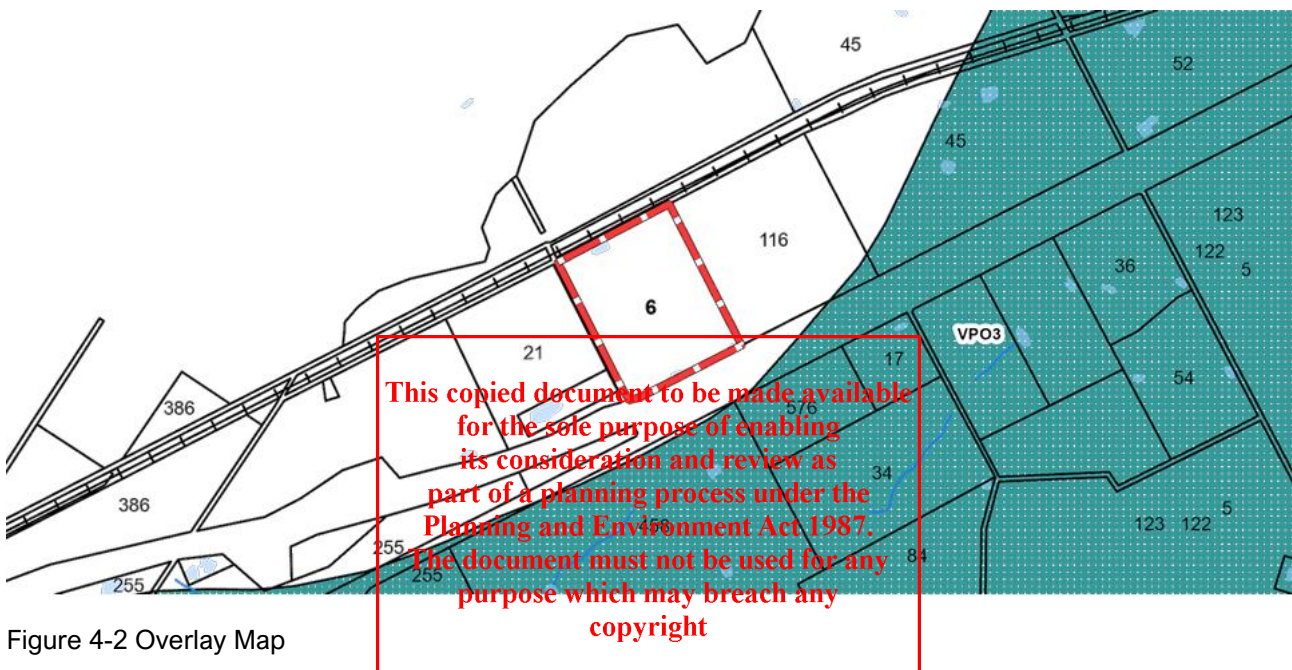


Figure 4-2 Overlay Map

The purposes of the VPO are:

- To implement the Municipal Planning Strategy and the Planning Policy Framework.
- To protect areas of significant vegetation.
- To ensure that development minimises loss of vegetation.
- To preserve existing trees and other vegetation.
- To recognise vegetation protection areas as locations of special significance, natural beauty, interest and importance.
- To maintain and enhance habitat and habitat corridors for indigenous fauna.
- To encourage the regeneration of native vegetation.

Additionally, Schedule 3 to the VPO contains the following vegetation protection objective:

- To protect and stop the removal of native vegetation in areas that support Regent Honeyeater.

4.5. Particular Provisions

Signage (Clause 52.05)

The purposes of this Clause are:

- To regulate the development of land for signs and associated structures.

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- To ensure signs are compatible with the amenity and visual appearance of an area, including the existing or desired future character.
- To ensure signs do not contribute to excessive visual clutter or visual disorder.
- To ensure that signs do not cause loss of amenity or adversely affect the natural or built environment or the safety, appearance or efficiency of a road.

A permit is required for business identification signage and must not exceed 3sqm.

There are a range of siting and design and impact considerations listed in the decision guidelines that apply to all signs.

Car Parking (Clause 52.06)

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The purposes of this clause are:

- To ensure that car parking is provided in accordance with the Municipal Planning Strategy and the Planning Policy Framework.
- To ensure the provision of an appropriate number of car parking spaces having regard to the demand likely to be generated, the activities on the land and the nature of the locality.
- To support sustainable transport alternatives to the motor car.
- To promote the efficient use of car parking spaces through the consolidation of car parking facilities.
- To ensure that car parking does not adversely affect the amenity of the locality.
- To ensure that the design and location of car parking is of a high standard, creates a safe environment for users and enables easy and efficient use.

No permit trigger applies under this Clause, however car parking is required to be provided to the satisfaction of the responsible authority under Clause 52.06.6 where there is no car parking rate specified under the table to Clause 52.06.

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Native Vegetation (Clause 52.17)

The purposes of this clause are:

- To ensure that there is no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation. This is achieved by applying the following three step approach in accordance with the Guidelines for the removal, destruction or lopping of native vegetation, Department of Environment, Land, Water and Planning, 2017 (the native vegetation guidelines):
 1. Avoid the removal, destruction or lopping of native vegetation.
 2. Minimise impacts from the removal, destruction or lopping of native vegetation that cannot be avoided.
 3. Provide an offset to compensate for the biodiversity impact if a permit is granted to remove, destroy, or lop native vegetation.
- To manage the removal, destruction or lopping of native vegetation to minimise land and water degradation.

It is proposed to remove 0.646 hectares of native vegetation. The application falls within the Detailed Assessment Pathway.

Land adjacent to the Principal Road Network (Clause 52.29)

The purposes of this clause are:

- To ensure appropriate access to the Principal Road Network or land planned to form part of the Principal Road Network.
- To ensure appropriate subdivision of land adjacent to Principal Road Network or land planned to form part of the Principal Road Network.

The proposal includes a new site access point to Bowers Rd, which falls just within the Transport Zone 2. As such, the permit requirement to create or alter access to a road in a Transport Zone 2 is applicable, and an assessment against the provisions of Clause 52.29 is provided in Section 4 of this report.

Significant Economic Development (Clause 53.22)

The purposes of this clause are:

- To prioritise and facilitate the planning, assessment and delivery of projects that will make a significant contribution to Victoria’s economy and provide substantial public benefit, including jobs for Victorians.
- To provide for the efficient and effective use of land and facilitate use and development with high quality urban design, architecture and landscape architecture.

Clause 53.22-1 applies to any planning application if the conditions in Table 1 are met. For Category 1 within Table 1, the use must be specified in Table 2, and the corresponding conditions must also be met.

The proposed use is a utility installation, and it meets the relevant conditions by being for the transmission, distribution, or storage of electricity with an installed capacity of 1 megawatt or greater, as required by Table 2. Clause 53.22 therefore applies.

The main effect of 53.22 is that the application is exempt from the decision requirements of sections 64(1), (2) and (3) and the review rights of section 82(1) of the Environment Act 1987.

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4.6. Planning Policy Framework (PPF)

This section lists the key policies from the PPF that are relevant to the proposal. Further detail is provided in the assessment section of this report.

Clause 12 Environmental and landscape values

Clause 12 states that planning should help to protect the health of ecological systems and the biodiversity they support (including ecosystems, habitats, species and genetic diversity) and conserve areas with identified environmental and landscape values.

Planning must implement environmental principles for ecologically sustainable development that have been established by international and national agreements. Foremost amongst the national agreements is the Intergovernmental Agreement on the Environment, which sets out key principles for environmental policy in Australia. Other agreements include the National Strategy for Ecologically Sustainable Development, National Greenhouse Strategy, the National Water Quality Management Strategy, Australia’s Strategy for Nature 2019-2030, the National Forest Policy Statement and National Environment Protection Measures.

Planning should protect, restore and enhance sites and features of nature conservation, biodiversity, geological or landscape value.

Clause 12.01-1S ‘Protection of biodiversity’ has the objective to protect and enhance Victoria’s biodiversity. For the reasons outlined further within this report, the Project is assessed to be consistent with these clauses. A highly relevant provision to this planning permit application is **Clause 12.01-2S ‘Native vegetation**

management', which has the objective to ensure that there is no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation.

For the reasons outlined further within this report under the assessment of biodiversity, and within the accompanying Flora and Fauna Assessment at Appendix D, the Project is assessed to suitably apply the three-step approach of avoiding the removal of native vegetation, minimising removal that cannot be avoided, and providing an offset to compensate for the removal.

Finally, the Project is considered to accord with **Clause 12.05-2S 'Landscapes'**, which has the objective to protect and enhance significant landscapes and open spaces that contribute to character, identity and sustainable environments. In particular, reference is made to the results of the LVIA, which are outlined in more detail below.

Clause 12.01-1S includes the following strategies to achieve the objectives:

- Use biodiversity information to identify important areas of biodiversity, including key habitat for rare or threatened species and communities, and strategically valuable biodiversity sites.
- Strategically plan for the protection and conservation of Victoria's important areas of biodiversity.
- Ensure that decision making takes into account the impacts of land use and development on Victoria's biodiversity, including consideration of:
 - o Cumulative impacts.
 - o Fragmentation of habitat.
 - o The spread of pest plants, animals and pathogens into natural ecosystems.
- Avoid impacts of land use and development on important areas of biodiversity.
- Consider impacts of any change in land use or development that may affect the biodiversity value of national parks and conservation reserves or nationally and internationally significant sites; including wetlands and wetland wildlife habitat designated under the Convention on Wetlands of International Importance (the Ramsar Convention) and sites utilised by species listed under the Japan-Australia Migratory Birds Agreement (JAMBA), the China-Australia Migratory Birds Agreement (CAMBA), or the Republic of Korea-Australia Migratory Bird Agreement (ROKAMBA).
- Assist in the identification, protection and management of important areas of biodiversity.
- Assist in the establishment, protection and re-establishment of links between important areas of biodiversity, including through a network of green spaces and large-scale native vegetation corridor projects.
- Support land use and development that contributes to protecting and enhancing habitat for indigenous plants and animals in urban areas.

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Clause 12.01-2S includes the following strategies to achieve the objectives:

- Ensure decisions that involve, or will lead to, the removal, destruction or lopping of native vegetation, apply the three-step approach in accordance with the Guidelines for the removal, destruction or lopping of native vegetation (Department of Environment, Land, Water and Planning, 2017):
 - o Avoid the removal, destruction or lopping of native vegetation.
 - o Minimise impacts from the removal, destruction or lopping of native vegetation that cannot be avoided.

- Provide an offset to compensate for the biodiversity impact from the removal, destruction or lopping of native vegetation.

Clause 13 Environmental Risks and Amenity

Clause 13 relates to environmental risks and amenity, calling for planning to strengthen the resilience and safety of communities through best practise environmental management.

Clause 13.01-1S ‘Natural hazards and climate change’ has the objective to minimise the impacts of natural hazards and adapt to the impacts of climate change through risk-based planning, while clause **13.02-1S ‘Bushfire planning’** has the objective to strengthen the resilience of settlements and communities to bushfire through risk-based planning that prioritises the protection of human life. The Project is assessed to accord with the direction of these policies. If a permit is granted, it is expected that conditions will be imposed requiring the submission and approval of an Emergency Management Plan incorporating a Fire Management Plan.

Clause 13.03-1S ‘Floodplain management’ has the objective to assist the protection of life, property, and community infrastructure from flood hazard, including coastal inundation, riverine and overland flows; the natural flood carrying capacity of rivers, streams, and floodways; the flood storage function of floodplains and waterways; and floodplain areas of environmental significance or of importance to river, wetland, or coastal health.

Provisions of central importance to this permit application include **Clause 13.05-1S ‘Noise management’**, which has the objective to assist the management of noise effects on sensitive land uses, as well as clause **13.07-1S ‘Land use compatibility’**, which has the objective to protect community amenity, human health and safety while facilitating appropriate commercial, industrial, infrastructure or other uses with potential adverse off-site impacts.

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Clause 14 Natural resource management

Clause 14.01-1S ‘Protection of agricultural land’ has the objective to protect the state’s agricultural base by preserving productive farmland. The primary relevant strategy of this Clause is to balance the potential off-site effects of a use or development proposal (such as degradation of soil or water quality and land salinisation) against the benefits of the proposal.

Clause 14.01-2S relates to sustainable agricultural land use and includes strategies to ensure agricultural use and productive rural land use activities are managed to maintain the long-term sustainable use and management of existing natural resources. While agricultural issues are not considered to be a key consideration in this permit application, a detailed assessment of these matters is provided in the following sections of this report. An Agricultural Assessment is also provided by Meridian Agriculture, and included at Appendix J.

The Project is considered to accord with the above clauses, including relevant strategies to avoid permanent removal of productive agricultural land from the state’s agricultural base, protect productive farmland that is of strategic significance in the local or regional context, protect productive agricultural land from unplanned loss due to permanent changes in land use, and protect strategically important agricultural and primary production land from incompatible uses.

Clause 15 Built Environment and Heritage

Clause 15.01-6S relates to Design for rural areas with the objective to ensure that development respects valued areas of rural character. The strategies to achieve this include:

- *Ensure that the siting, scale and appearance of development protects 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.*

Clause 15.01-6L contains Council’s local policy relating to rural design, which applies to the construction of a building in rural zones. The strategies of this clause are:

- *Encourage the use of muted colours for building materials.*
- *Encourage siting and design that reduces the visual impact of the building on the landscape.*

Clause 15.03 – relates to heritage and aboriginal cultural heritage, however we note that there are no overlays or mapped areas affecting the subject site.

Clause 17 Economic Development

Clause 17.01-1S ‘Diversified economy’ has the objective to strengthen and diversify the economy, while **Clause 17.01-1R ‘Diversified economy - Hume’** has the relevant strategy to encourage appropriate new and developing forms of industry, agriculture, tourism and alternative energy production.

Clause 18 Transport

Clause 18.01-1S ‘Land use and transport integration’ has the objective to facilitate access to social, cultural, and economic opportunities by effectively integrating land use and transport, while **Clause 18.02-4S ‘Roads’** has the objective to facilitate an efficient and safe road network that integrates all movement networks and makes best use of existing infrastructure.

Additionally, **‘Clause 18.01-2L Transport System’** has a number of strategies relevant to the project, including to protect the Hume Freeway from sensitive uses, and encourage development to be set back from main roads and the Hume Freeway to reduce the effects of noise.

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The Project is assessed to be consistent with these objectives as well as relevant strategies to protect existing transport infrastructure from detriment that would impact on the function of the asset, protect the Principal Road Network to provide high mobility for through traffic and the efficient movement of freight, as well as provide an adequate supply of car parking that is appropriately designed and located. A more detailed assessment of traffic matters is provided below.

Clause 19 Infrastructure

Clause 19.01-1S ‘Energy supply’ has the objective to facilitate appropriate development of energy supply infrastructure.

The Project is considered to accord with the direction of this Clause, including the relevant strategies to support the development of energy generation 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, support energy infrastructure projects in locations that minimise land use conflicts, including in any renewable energy zones declared under section 63 of the *National Electricity (Victoria) Act 2005*, support energy infrastructure projects in locations that take advantage of existing and planned resources and infrastructure networks, and facilitate energy infrastructure projects that help diversify local economies and improve sustainability and social outcomes.

Provisions of central importance to this permit application include **Clause 19.01-2S ‘Renewable energy’**, which has the objective to support the provision and use of renewable energy in a manner that ensures appropriate siting and design considerations are met.

This clause includes the following strategies relevant to the proposal:

- *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.*
- *Facilitate renewable energy development in appropriate locations, including in any renewable energy zones declared under section 63 of the National Electricity (Victoria) Act 2005.*
- *Protect renewable energy infrastructure against competing and incompatible uses.*
- *Set aside suitable land for future renewable energy infrastructure.*
- *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.*

The policy guidelines ask for consideration of the following documents as relevant:

- The long-term emissions reduction target specified in section 8 of Part 2 of the *Climate Action Act 2017*.
- Interim emissions reduction targets determined under Division 2 of Part 2 of the *Climate Action Act 2017*.
- Adaptation action plans prepared under Division 2 of Part 5 of the *Climate Action Act 2017*.

Relevant policy documents include:

- Victoria's Climate Change Strategy (Department of Environment, Land, Water and Planning, May 2021)
- Community Engagement and Benefit Sharing in Renewable Energy Development in Victoria (Department of Environment, Land, Water and Planning, July 2021)

And to a lesser extent, consideration should be given to the *Solar Energy Facilities Design and Development Guideline* (Department of Environment, Land, Water and Planning, October 2022).

Clause 19.01-2R ‘Renewable energy - Hume’, has strategies to create renewable energy hubs that support co-location of industries to maximise resource use efficiency and minimise waste generation and to support opportunities to generate renewable energy from waste.

4.7. Legislation

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4.7.1. Planning and Environment Act 1987 (Vic)

The purpose of the P&E Act is to establish a framework for planning the use, development, and protection of land in Victoria in the present and long-term interests of all Victorians.

The objectives of planning in Victoria are:

- a) to provide for the fair, orderly, economic and sustainable use, and development of land.

- b) to provide for the protection of natural and man-made resources and the maintenance of ecological processes and genetic diversity.
- c) to secure a pleasant, efficient and safe working, living and recreational environment for all Victorians and visitors to Victoria.
- d) to conserve and enhance those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value.
- e) to protect public utilities and other assets and enable the orderly provision and co-ordination of public utilities and other facilities for the benefit of the community.
- f) to facilitate development in accordance with the objectives set out in paragraphs (a), (b), (c), (d) and (e).
- g) to facilitate the provision of affordable housing in Victoria.
- h) to balance the present and future interests of all Victorians.

4.7.2. Environmental Effects Act 1978 (Vic)

Under the *Environment Effects Act 1978* (EE Act), assessment of the potential environmental impacts or effects of a proposed development may be required. The process is not an approval process itself, rather it enables statutory decision-makers to make decisions about whether a project with potentially significant environmental effects should proceed.

If the Minister for Planning decides that an Environment Effects Statement (EES) is required, the proponent is responsible for preparing the EES and undertaking the necessary investigations.

It is assessed that the Project does not require a referral under the EE Act as it does not trigger any criteria for individual potential environmental effects or criteria for a combination of potential environmental effects.

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4.7.3. Environmental Protection Act 2017 (Vic)

The *Environment Protection Act 2017* (EPA Act), as significantly amended by the *Environment Protection Amendment Act 2018* and other Acts, came into effect on 1 July 2021. It includes environmental obligations and protections for all Victorians and changes Victoria’s focus for environment protection and human health to a prevention-based approach. It includes the general environmental duty and gives the Environment Protection Authority (EPA) enhanced powers and tools to prevent and minimise the risks of harm to human health and the environment from pollution and waste.

EPA employs a variety of tools collectively referred to as 'permissions,' encompassing licenses, permits, and registrations. These tools serve as EPA's authorisation for the management of activities with potential environmental impact. The framework is designed to facilitate businesses in fulfilling their environmental obligations effectively.

The determination of whether a license, permit, or registration is necessary hinges on the perceived risk and nature of the activity in question. The Permissions proposal pathway guideline, outlined in Publication 1995, offers valuable assistance in discerning the appropriate permission required and provides guidance on the application process.

Effective July 1, 2021, certain activities that previously did not require EPA authorisation now trigger obtaining a permission due to the associated risks they may pose. The use of land for a renewable energy facility falls outside the definition of a prescribed activity, therefore no EPA approval is required.

4.7.4. Aboriginal Heritage Act 2006 (Vic)

The Aboriginal Heritage Act 2006 (AH Act) provides for the protection of Aboriginal cultural heritage in Victoria. It allows different organisations, groups, and bodies to connect and better enforce and preserve policies regarding Aboriginal Heritage. It does this through:

- Establishing the Victorian Aboriginal Heritage Council.
- Establishing Registered Aboriginal Parties.
- Establishing the Victorian Aboriginal Heritage Register.
- CHMPs and Cultural Heritage Permit processes.

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4.7.5. Aboriginal Heritage Regulations 2018 (Vic)

The *Aboriginal Heritage Regulations 2018* (AH Regulations) give effect to the AH Act. Principally, the AH Regulations define 'high impact activities' and 'areas of cultural heritage sensitivity'. Where a high impact activity is proposed in an 'area of cultural heritage sensitivity', a CHMP must be prepared, however there are no mapped areas on this site.

4.7.6. Climate Action Act 2017 (Vic)

The *Climate Action Act 2017* (CA Act) provides Victoria with the legislative foundation to manage climate change risks, maximise the opportunities that arise from decisive action, and drive our transition to a climate-resilient community and economy with net-zero emissions by 2050.

The title of this Act was changed from the *Climate Change Act 2017* to the *Climate Action Act 2017* by section 3 of the *Climate Change and Energy Legislation Amendment (Renewable Energy and Storage Targets) Act 2024*, No. 9/2024.

References to this Act were updated in the relevant Clauses of the Planning Scheme as part of Amendment VC268, which was recently gazetted on 5 September 2025.

It sits alongside other key Victorian Government energy and climate change initiatives including Victoria's Climate Change Framework and the Victoria's Renewable Energy Action Plan.

Among other purposes, the *CA Act* sets a long-term greenhouse gas emissions reduction target, provides for the setting of 5-yearly interim greenhouse gas emissions reduction targets; facilitates the consideration of climate change issues, and sets policy objectives and guiding principles to inform decision-making.

Section 6 states that for the purposes of the *CA Act*, “the long-term emissions reduction target for the State is an amount of net zero greenhouse gas emissions by the year 2045”. Section 20 states, “the Government of Victoria will endeavour to ensure that any decision made by the Government and any policy, program or process developed or implemented by the Government appropriately takes account of climate change if it is relevant by having regard to the policy objectives and the guiding principles”.

The relevant Victorian Renewable Energy Targets, as legislated in the *Renewable Energy (Jobs and Investment) Act 2017 (Vic)* include:

- 25% by 2020 (achieved)
- 40% by 2025
- 65% by 2030
- 95% by 2035.

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Specifically in relation to storage, the targets are:

- at least 2.6 GW of energy storage capacity by 2030
- at least 6.3 GW by 2035.

4.7.7. Environmental Protection and Biodiversity Conservation Act 1999 (Cth)

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is the Australian Government’s central piece of environmental legislation. It provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places — defined in the EPBC Act as matters of national environmental significance.

The objectives of the EPBC Act are as follows:

- to provide for the protection of the environment, especially those aspects of the environment that are matters of national environmental significance; and
- to promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources; and
- to promote the conservation of biodiversity; and
- (c-a) to provide for the protection and conservation of heritage; and
- to promote a co-operative approach to the protection and management of the environment involving governments, the community, land holders and indigenous peoples; and
- to assist in the co-operative implementation of Australia’s international environmental responsibilities; and
- to recognise the role of indigenous people in the conservation and ecologically sustainable use of Australia’s biodiversity; and
- to promote the use of indigenous peoples’ knowledge of biodiversity with the involvement of, and in co-operation with, the owners of the knowledge.

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As noted under Section 4.1 of the Ecological Assessment prepared by Biosis at Appendix D, it is considered unlikely that a significant impact on any Matters of National Environmental Significance (MNES) would result from the proposed action. EPBC Act referral is therefore unlikely to be required.

4.7.8. Flora and Fauna Guarantee Act 1988 (Vic)

The *Flora and Fauna Guarantee Act 1988* (FFG Act) is the main Victorian legislation governing the conservation of threatened species and ecological communities and addresses the management of processes that threaten native flora and fauna. It enables the listing of threatened species and communities and threats to native species, and the declaration of critical habitat necessary for their survival.

There is suitable habitat within the study area (i.e., along roadsides) for a range of flora and fauna species. Flora species which may occur within the study area include Buloke Woodlands, Grey Box, White Box-Yellow Box, Creekline, Grey Box-Buloke, and Northern Plains Grassland Community. Fauna species which have the potential to occur within the study area include Swift Parrot, Painted Honeyeater, Regent Honeyeater, Diamond Firetail, and Brown Treecreeper (south-eastern).

The ecological assessment notes that a Protected Flora Permit is not required for the subject site, however may be required if any protected species are impacted on roadsides.

4.7.9. Renewable Energy (Jobs and Investment) Act 2017

As legislated in the *Renewable Energy (Jobs and Investment) Act 2017* (REJI Act), Victoria's renewable energy targets are:

- 25% by 2020 (achieved)
- 40% by 2025
- 65% by 2030
- 95% by 2035.

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In relation to storage, the targets are:

- at least 2.6 GW of energy storage capacity by 2030
- at least 6.3 GW by 2035. Meeting these targets will:

Meeting these targets will:

- Create investment in new renewable energy projects in Victoria.
- Support the reliability of Victoria's electricity supply.
- Create thousands of jobs.
- Put downward pressure on electricity prices.
- Reduce emissions from electricity generation.

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4.8. Other Guidelines and Relevant Documents

Design Guidelines and Model Requirements for Renewable Energy Facilities v4, CFA 2023

The purpose of the CFA Guidelines is to provide standard considerations and measures in relation to fire safety, risk, and emergency management to be considered when designing, constructing and operating new renewable energy facilities and utility installations, and upgrading existing facilities. The CFA Guidelines are designed to:

- Reduce the occurrence and consequences of fire at renewable energy facilities through risk-based design and enable safe and effective emergency response through the provision of fire protection systems.
- Inform fire and risk management processes for all phases of a facility's lifespan, through the preparation of RMPs and FMPs by facility operators.
- Support operators to prepare EMMPs that effectively consider bushfire.
- Support the preparation of planning applications and their assessment by authorities.

The CFA Guidelines set out design guidelines and model requirements in relation to matters such as emergency vehicle access, firefighting water supply, fire protection systems, landscape screening and on site vegetation, fire breaks, separation of solar panel banks. Regarding these and other matters, the CFA recommend that facility operators develop a Fire Management Plan and Emergency Management Plan.

Community Engagement and Benefit Sharing in Renewable Energy Development in Victoria: A guide for renewable energy developers (DELWP 2021)

This guide sets the Victorian Government's expectations for leading practice community engagement and benefit sharing across all renewable energy technologies. Sections 1 and 2 provide renewable energy

developers with detailed information about community engagement and benefit sharing and explain why both are important to secure a strong social license to operate (SLO).

Renewable energy developers are encouraged to draw on local expertise and knowledge to inform their plans, including the experience of Traditional Owner groups and Aboriginal Victorians. The document encourages best practice engagement and discusses Community Benefit Sharing.

Use of a government road

To use the government road (Hume Freeway), for connecting infrastructure, permission is required from the relevant land manager.

- Where there is a Government Road Reserve – all approvals and requirements relating to development within the Road Reserve must be from the Municipal Council.
- Services are a permitted use of Government Road reserves and approval is required from Benalla Rural City Council.
- Consent would be required to use the government road for underground connection cabling.
- The consent would be requested from DEECA, while Council approval may also be sought so that they are aware of the location of any underground cables.
- The type of consent is to be determined by DEECA as this depends on how they categorise the infrastructure.
- Obtaining consent is a condition of the State Government and is broadly supportive of renewable energy and storage projects.
- Avoiding removal of native vegetation on the government road is strongly encouraged.
- There may be some fees associated with obtaining permission to use the government road.

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Hume Regional Growth Plan

The Hume Regional Growth Plan (Victorian Government, 2014) is listed as a background document under Clause 72.08 of the Benalla Planning Scheme. The plan effectively maps out the region’s strategy to encourage and accommodate growth and manage change over the next 30 years.

The Hume Regional Growth Plan outlines the following strategies and initiatives that are directly relevant to the proposed Winton BESS:

- Infrastructure to support renewable energy initiatives;
- Transitioning some previous agricultural areas toward other uses such as renewable energy generation;
- Develop renewable energy generation and decentralised systems as part of Hume’s electricity network to accommodate future growth;
- Promote renewable energy hubs to co-locate industries to maximise resource use efficiency and minimise waste generation.

In particular, Part C (11.3 – Energy and earth resources) of the Regional Growth Plan discusses the opportunities that existed within the Hume Region for sustainable electricity generation, and includes the following recommendation:

The region is home to key electricity distribution infrastructure, such as substations and networks. Sustainable electricity generation that is connected to existing infrastructure could offer a regional advantage, particularly as the technology used to generate sustainable electricity improves.

Victorian Transmission Plan (VicGrid, 2025)

The Victorian Transmission Plan was recently released by VicGrid, and outlines the first long-term strategic plan for transmission and renewable energy zone development in Victoria. The plan was formally introduced into the Planning Scheme through the recent Amendment VC268, which specifically updated Clause 19.01-1S (Energy Supply) and Clause 19.01-2S (Renewable Energy) of the Victoria Planning Provisions.

The Victoria Transmission Plan sets out the new energy infrastructure required to meet Victoria’s renewable energy targets, with a focus on minimising impacts to communities, landholders and Traditional Owners.

The key features of the plan include:

- Proposed renewable energy zones: 6 designated areas across Victoria which are most suitable to host new renewable energy generation.
- Proposed Gippsland Shoreline Renewable Energy Zone; and
- Transmission network upgrades: Proposed transmission projects from 2025-2040, including upgrades to existing terminal stations, to reconstruction existing transmission infrastructure, and 4 new transmission projects.

We expect the Winton BESS will be located within the eastern section of the proposed Central North Renewable Energy Zone (REZ) once REZ boundaries are formally gazetted. The proposed Central North REZ has been identified as an area with access to solar and wind energy that can provide flexibility in supporting Victoria’s overall energy mix.

5. Assessment of the Proposal

5.1. Planning Assessment

This section provides a comprehensive assessment of the Project against the relevant planning and policy considerations.

5.1.1. Legislation

For the reasons outlined further within this report, the Project is assessed to be consistent with the objectives of planning in Victoria that are set out by the *P&E Act*. In particular, this includes the fair, orderly, economic and sustainable use, and development of land; protection of natural resources; as well as balancing the present and future interests of all Victorians.

Further, the Project will contribute to meeting the long term and interim greenhouse gas emissions reduction targets of the *Climate Action Act*. The decision on the Project should therefore appropriately take into consideration the stated storage targets for the state.

Finally, the Project will contribute to meeting Victoria’s storage targets, as legislated. The Project will not result in emissions such as waste and or environmental impacts.

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5.1.2. Planning Policy Framework

5.1.2.1. Environmental and Landscape Values

The assessment provided in this report, and within the Ecological Assessment completed by Biosis, as well as the Visual Impact Assessment provided by GbLA, demonstrates that the proposal is consistent with the objectives and strategies of Clause 12 (Environmental and landscape values), with specific reference to Clauses 12.01-1S, Clause 12.01-2S, and Clause 12.05-2S.

As noted above, the project suitably applies the three-step approach of avoiding the removal of native vegetation, minimising removal that cannot be avoided, and providing an offset to compensate for the removal.

This is detailed further in the Flora and Fauna Assessment prepared by Biosis which is included at Appendix D. The main findings of that assessment are summarised in the Table below, with specific reference to key biodiversity legislation and policy:

Table 5-1 Ecological Assessment against Government Legislation and Policy (Biosis, 2025)

Legislation/Policy	Relevant ecological feature on site	Permit/approval required	Notes
<p>Environment Protection and Biodiversity Conservation Act 1999</p>	<p>Five EPBC Act listed fauna species assessed as likely to occur with a medium or higher likelihood:</p> <ul style="list-style-type: none"> • Swift Parrot • Regent Honeyeater • Painted Honeyeater • Diamond Firetail • Brown Treecreeper (south-eastern) <p>One EPBC Act listed threatened ecological community:</p> <ul style="list-style-type: none"> • Grey Box (<i>Eucalyptus microcarpa</i>) Grassy Woodland and Derived Native Grassland of South-eastern Australia 	<p>Referral not recommended as significant impact on matters of national environmental significance considered unlikely.</p>	<p>Targeted survey for Sloane’s Froglet (<i>Litoria sloanei</i>) was undertaken in suitable habitat on the BESS site, with no individuals recorded, and as such the species is considered to have a low likelihood of occurrence. Suitable habitat is also Present along the connection route corridor but there will be no impacts on areas of potential habitat. The study area contains Swift Parrot and Regent Honeyeater foraging species such as Mugga Ironbark, Grey Box, White Box and Yellow Box. There will be minimal impacts on Grey Box (0.499 ha) dominated patch vegetation. This vegetation removal is not considered to constitute a significant impact on Swift Parrot and Regent Honeyeater. Painted Honeyeater, Diamond Firetail and Brown Treecreeper (south-eastern) may occasionally forage in the study area, but the impacts on small patches of habitat is not considered to constitute a significant impact on these highly mobile species. There will be no impacts on vegetation representing the Grey Box Grassy</p>

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Legislation/Policy	Relevant ecological feature on site	Permit/approval required	Notes
			Woodland community.
Flora and Fauna Guarantee Act 1988	Listed Flora species, communities and protected flora species recorded on site.	Protected Flora Permit not required on private land but may be required if any protected species are impacted on roadsides.	The BESS site is private land with public road reserves to be crossed by the connection route. If there are protected species under the FFG Act that are impacted by the works associated with the cable route, a Protected Flora Permit may be required.
Planning & Environment Act 1987	All indigenous vegetation to be removed, destroyed or lopped.	Planning permit required to remove, destroy or lop native vegetation. Permit application needs to address provisions of the Benalla Planning Scheme and Vegetation Protection Overlay 3 (VPO3). The Minister for Planning is the responsible authority for BESS sites and associated development in Victoria.	An assessment against Victoria's Guidelines for the removal, destruction or lopping of native vegetation is provided in Section 5 for a Detailed Assessment Pathway planning application. A response to VPO3 application requirements and guidelines (Regent Honeyeater Habitat / Lurg Ironbark vegetation protection area) is provided in Section 4 of this report.
Catchment and Land Protection Act 1994	Noxious weeds, pest animals.	Several established pest animals and plants occur or are likely to occur within the study area. These include European Brown Hare <i>Lepus europaeus</i> and European Rabbit <i>Oryctolagus cuniculus</i> .	Established pest species are a serious threat to primary production, Crown land, the environment or community health in Victoria. Avenis Energy has the responsibility to take all reasonable steps to prevent the spread of, and as far as possible eradicate, established pest species within the study area.
Environmental Effects Act 1978	Native vegetation, wetlands and threatened species.	The individual and combined effects criteria are unlikely to be triggered for biodiversity impacts.	The individual and combined potential effects criteria based on the level of proposed native vegetation removal, EVC bioregional conservation status, impacts on FFG Act listed species and impacts on wetlands indicates the project is unlikely to trigger an EES referral.

This copy and Vegetation Protection Overlay 3 (VPO3) is 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 should not be used for any purpose which may breach any copyright.

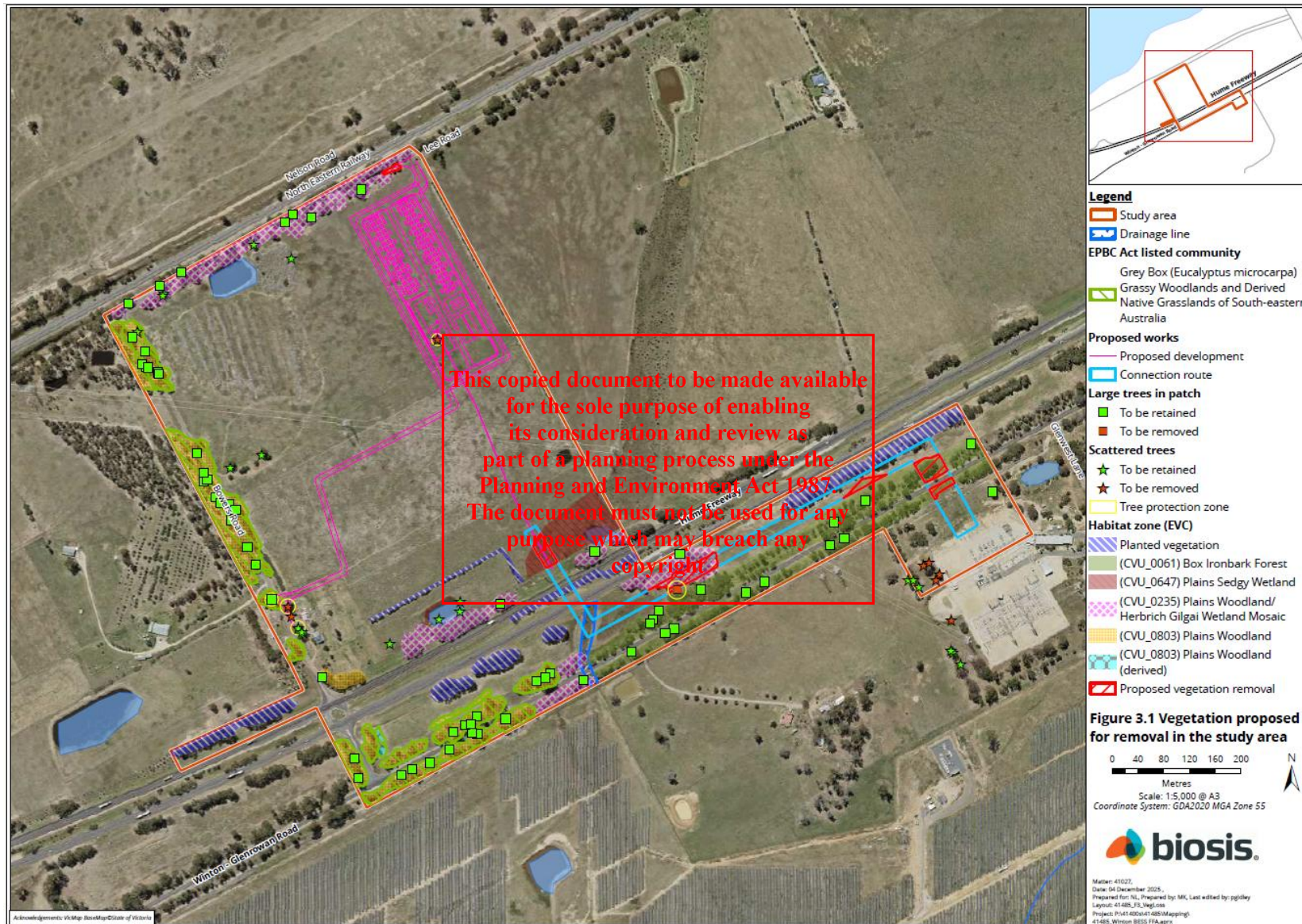


Figure 5-1 'Vegetation Proposed for Removal in the Study Area' map Figure (Biosis, 2025), with proposed vegetation removal shown in red.

Landscape / Visual Impact Assessment

A Visual Impact Assessment has been prepared by GbLA and is included at Appendix E. The Landscape assessment takes into account views to the site where the BESS is to be located from surrounding public and private realm locations.

Photomontages have been prepared from five locations, shown in the map in Figure 5-2 below.

Viewpoint 1:

- Bowers Road, Winton – looking north-east towards the proposed BESS

Viewpoint 2:

- Hume Freeway, Winton - Looking north towards the proposed BESS.

Viewpoint 3:

- Hume Freeway, Winton – Looking north towards the proposed BESS.

Viewpoint 4:

- Corner of Lee Road and Bowers Road, Winton – Looking east towards the proposed BESS.

Viewpoint 5:

- Lee Road, Winton – Looking south towards the proposed BESS.

The photomontages provided within the Visual Impact Assessment are conceptual visualisations of the proposed BESS and associated infrastructure, with the provision of landscape/vegetation screening. The depicted landscape screening represents a potential future state at the site, approximately 5 years after the completion of the soft landscaping.

A site visit and review of the context and landscape surrounding the subject site informed the determination of key visual receptors for the proposal. This review included an analysis of aerial photography, topographic survey, and site assessment.

A terrain and wire frame model of the proposed BESS facility has been integrated into the proposed photomontage for each of the visual receptor locations.

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LANDSCAPE MASTERPLAN AND SENSITIVE RECEIVER LOCATIONS



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KEY

- Title Boundary
- Existing Contours (0.2m interval)
- Surveyed Existing Tree/Shrub
- Other Existing Tree/Shrub
- Existing vegetation to be removed
- Existing tree to be retained
- Overhead Power Line
- Existing Road
- Existing Fence
- Proposed 4.5 High Sound Barrier
- Proposed 6m High Sound Barrier
- Proposed Cyclone Fence
- 10m Planting Buffer
- Proposed small to medium sized trees and understory shrubs.
- Visual receiver location
- Proposed Vehicle Access Point

Proposed 5-Year Screening Plant Schedule

5-Year Growth Height Summary for Proposed Trees

Scientific Name	Common Name	5-Year Height (Optimal)	5-Year Height (Suboptimal)	Mature Size (H x W)	Growth Rate	Qty
<i>Acacia saligna</i>	Blackwood Wattle	3-6m	1.5-3m	12-30m x 5m	Fast	9
<i>Acacia robusta</i>	Lightwood	3-4m	2-2.5m	6-10m x 4-6m	Fast	5
<i>Quercus tereticaedea</i>	Bull Oak	3-4m	1-2m	7-8m x 3-4m	Moderate	7
<i>Eucalyptus microcarpa</i>	Grey Box	3-6m	1.5-3m	10-25m x 15m	Moderate to Fast	8
<i>Eucalyptus leucocylon</i>	Yellow Gum	3-6m	1.5-3m	10-30m x 6-20m	Moderate to Fast	6
Total:						35

5-Year Growth Height Summary for Proposed Shrubs

Scientific Name	Common Name	5-Year Height (Optimal)	5-Year Height (Suboptimal)	Mature Size (H x W)	Growth Rate	Qty
<i>Acacia acinaces</i>	Gold Dust Wattle	1.5-2.5m	0.8-1.5m	2-3m x 2m	Moderate to Fast	68
<i>Bursaria spinosa</i>	Sweet Bursaria	2.5-3m	1.5-2m	3-6m x 2-4m	Moderate	19
<i>Callistemon sieberi</i>	River Bottlebrush	2-3m	1-2m	3-8m x 1-2m	Fast	33
<i>Dodonaea viscosa</i>	Sticky Hop Bush	2-4m	1-2m	1-8m x 2-4m	Fast	18
<i>Indigofera australis</i>	Austral Indigo	1.5-2m	1-1.2m	2-3m x 2m	Fast	43
<i>Pitoposium angustifolium</i>	Gumbi Gumbi	2-4m	1-2m	4-10m x 3-5m	Moderate	18
Total:						199

- Notes:**
- Optimal Conditions: Full sun, well-drained soil, regular watering during establishment (8-12 weeks), and minimal stressors (e.g., frost, drought).
 - Suboptimal Conditions: Poor soil, limited water, heavy shade, or extreme climate conditions.
 - Plant Installation: Assume all plant material will be installed as tubestock plants.
 - Tubestock: Small plants (50mm pots) take 6-18 months to establish, with faster-growing species (e.g., *Callistemon sieberi*, *Dodonaea viscosa*, *Indigofera australis*) reaching greater heights in 5 years.
 - Sources: Growth estimates are based on general species characteristics, nursery data, and web resources.

Project No: 24057
 Winton BESS
 6 Stovers Lane, Winton
 GbLA.COM.AU
 1 : 4000 @ A1 | 1 : 8000 @ A2 | 1 : 16000 @ A3 | 1 : 32000 @ A4
 02/02/2025



Figure 5-2 Extract from Landscape Masterplan, with visual receiver locations numbered 1-5 (GbLA, 2025)

A summary of the assessment for each of the four identified viewpoints is provided below:

Viewpoint 1:

The view from the west of the BESS facility has been taken at the central section of the Bowers Road frontage.. The distance to the nearest BESS units from the receptor location is 225m. The proposed BESS units will be visible from the receptor location, however a 10m wide native vegetation buffer, including native trees and shrub planting, is proposed on the outer side of the security fencing to filter views from Bowers Road.

The visual impact assessment rating is considered low, having regard for the proposed buffer planting at maturity, and the existing solar panel installations to the north and east of the site.

Viewpoint 2:

The view looking north to the south of the BESS facility has been taken along the Hume Freeway, within the western portion of the southern boundary of the site. The receptor location is indicative of a view from a vehicle travelling along the Hume Freeway. The nearest BESS unit is 500m from this receptor location.

Views to the proposed BESS from this location will be filtered by the existing vegetation within the subject site, while the proposed 10m wide native vegetation buffer outside of the security fencing on the southern and western sides of the BESS will further restrict views from this receptor location.

The visual impact assessment rating is considered low once the buffer planting reaches maturity.

Viewpoint 3:

The view looking north at the south of the BESS facility has been taken along the Hume Freeway, in the eastern portion of the southern boundary of the site. The receptor location is indicative of a view from a vehicle travelling along the Hume Freeway. The nearest BESS unit is 390m from this receptor location.

The proposed BESS units will be visible from the receptor location, however a 10m wide native vegetation buffer, including native trees and shrub planting, is proposed on the outer side of the security fencing on the southern side of the BESS to filter views from the Hume Freeway.

The visual impact assessment rating is considered low once the buffer planting reaches maturity.

Viewpoint 4:

The view from the north-west of the BESS facility has been taken at the corner of Bowers Road and Lee Road. The receptor location is approximately 390m from the nearest BESS unit.

The proposed BESS infrastructure will be largely screened by the acoustic barriers located along the western side of the facility, which are proposed in grey-green finish. The proposed 10m wide native vegetation buffer will provide additional visual screening and will assist in softening the built form of the facility when viewed from this viewpoint, and the surrounding landscape.

The visual impact assessment rating is considered low-moderate from this receptor location once the proposed planting reaches maturity.

Viewpoint 5:

The view looking south directly to the north of the BESS facility has been taken at the proposed Lee Road site access point location. The receptor location is approximately 65m from the nearest BESS unit.

The proposed BESS infrastructure will be partially screened by the proposed acoustic barriers, which will be finished in muted tones to reduce visual contrast with the surrounding landscape. The proposed access road

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from Lee Road, and the facility fencing will also be visible from this viewpoint. The proposed 10m wide native vegetation screening will further assist with integrating the facility within the surrounding landscape.

Having regard for the existing solar facility located directly to the east and north of this receptor location, and the absence of sensitive receivers around this location, the visual sensitivity of this viewpoint is assessed as low.

The visual impact assessment rating is considered moderate from this receptor location once the proposed planting reaches maturity.

Visual Impact Assessment Summary

Ultimately, the assessment demonstrates that the proposal will not be highly visible from the surrounding public and private realm locations. Existing vegetation around the site provides a visual buffer for the BESS, while the proposed landscape screening will further assist to ensure the proposal integrates appropriately within the surrounding undulating landscape.

The project has been sited and designed with due consideration for the natural form and key features of the surrounding area. The muted grey-green colour palette of the BESS infrastructure will further aid in integrating the BESS within the existing landscape, and the proposed native vegetation screening.

It is submitted that there will be no unreasonable visual impacts resulting from the proposed BESS and associated infrastructure.

5.1.2.2. Environmental Risks and Amenity

The assessment provided within this report and the accompanying specialist reports, demonstrate that the proposal meets the relevant objectives and strategies of Clause 13 (Environmental Risks and Amenity), including Clauses 13.01-1S, 13.02-1S, 13.03-1S, 13.05-1S, and 13.07-1S.

The specialist reports accompanying this application, which address bushfire risk, flooding and stormwater impacts, noise emissions, and ecological impacts, provide detailed assessment of these environmental and amenity considerations, and outline mitigation and management measures to address the relevant risks and amenity impacts associated with the proposed BESS, and the environmental features of the subject site and surrounding area.

It is considered that community amenity and human health will not be adversely impacted by the extent of noise emissions, or any potential environmental risks associated with the proposed BESS,

The suitable siting, design and location of the project will ensure that any resulting impacts are appropriate to the land use functions and character of the area. On balance, it is concluded that the Project is compatible with adjoining and nearby land uses and that, as far as reasonably practicable, any off-site impacts are avoided or otherwise minimised through siting, design, and operational measures.

Noise Emissions

A Noise Impact Assessment has been prepared by Marshall Day Acoustics, and is included in Appendix F.

The report describes the methodology used for the noise assessment and assesses the project in accordance with the requirements of the Environmental Protection Act and other relevant Victorian noise policy.

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The primary noise sources for the development will be from the battery unit, inverters and transformers. The noise control measures for the project, described in the report, include proprietary battery and inverter at-source noise mitigation (noise control kits) and noise barriers.

The equipment may run all together during any time period over 24 hours. The nearest noise sensitive receivers are located at 21 Bowers Road (approximately 180m from project boundary), 576 Winton-Glenrowan Rd (approximately 420m from project boundary), and 84 Glenwest Lane (approximately 1,200m from project boundary).

The predicted noise level at the nearest sensitive receiver (21 Bowers Road) is 32dB, being below the night period noise limit, and project target of 34dB.

The noise criteria for this assessment are in accordance with the EPA Noise Protocol and apply to each sensitive receiver based on the zoning information. It is noted that the subject site and nearest dwellings are all in the Farming Zone.

The noise assessment has also considered potential cumulative noise impacts from other noise sources on the surrounding area, including the adjoining renewable energy projects/facilities.

The report concludes that predicted noise levels from the project are below the EPA noise protocol limits for day, evening and night periods. The assessment is considered conservative on the basis that it is unlikely that all equipment will run simultaneously during the night-time period.

Fire and Risk Assessment

A Fire Risk Management Plan (RMP), which includes a fire safety study, has been prepared by Fire Risk Consultants and is included at Appendix H.

The RMP has been prepared in accordance with the *Design Guidelines and Model Requirements for Renewable Energy Facilities v4.4 (2023, updated June 2025)* (CFA Guidelines) and has been developed to support this planning application.

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It is noted that a more detailed analysis and assessment will occur via an updated RMP once any planning permit has been issued, and a battery manufacturer has been selected for the Project.

As per the CFA Guidelines, this report also aligns with *NSW Planning’s Hazardous Industry Planning Advisory Paper 2: Fire Safety Study Guidelines (2011)*. The report addresses the relevant matters of this and the CFA Guidelines.

The RMP details the following typical fire safety systems in Table 4-1 that are likely to be installed within Battery Units.

Table 5-2 Overview of fire safety systems (from RMP)

Fire Safety System	Description
Battery Management System (BMS)	The BMS constantly monitors cell and pack level voltage, temperature, State of Charge (SOC), and other parameters to ensure early detection of pre fault conditions, and immediate detection of fault events. Should any parameter exceed a permissible value, the BMS will disconnect the affected Battery Units and send an alarm to the monitoring centre. The BMS can be regularly updated as new technologies or learnings are introduced into the software

Detection and suppression systems	The Battery Units will be fitted with smoke, heat and gas detectors and an aerosol suppression system to detect and suppress fires. These systems will be connected to a Fire Indicator Panel located within a central area and will also be monitored through the Supervisory Control and Data Acquisition (SCADA) system.
Site controller and Monitoring (SCADA)	Beyond the built-in safeguards of the BMS described above, the Battery Units will have 24/7 remote monitoring, diagnostics, and troubleshooting capabilities, without the need to have a technician on site. Customers and first responders will benefit from immediate support from trained technicians via the monitoring centre. Additionally, the facility will have a local SCADA system.
Emergency system shutdown	In the event of an emergency on site, the Battery Units can be shut down locally, or remotely. A system shutdown will result in electrical isolation of the battery strings and cessation of battery charging or discharging.
IP Rating	<p>The IP (Ingress Protection) rating varies for each manufacturer, but it will likely be elevated in that it will prevent ember ingress into the Battery Units. The IP rating is defined by the international standard EN 60529 (British Standard BS EN 60529:1992). The first digit relates to the ability for solids to enter the enclosure and the second digit indicates the ability for liquids to enter the enclosure. Most Battery Units are a minimum of IP55 rating, and this is classified as:</p> <ul style="list-style-type: none"> • Ingress of dust is not entirely prevented, but it must not enter in sufficient quantity to interfere with the safe operation of the equipment. • Water projected by a nozzle (6.3 mm) against enclosure from any direction shall have no harmful effects. <p>In the unlikely event of a bushfire in the surrounding vegetation that develops embers, the IP rating will likely reduce the ability for embers to enter the Battery Unit.</p>
Explosion prevention	The chosen Battery Unit will comply with Clause 9.6.5.1.5 of NFPA 855. This clause permits compliance with either NFPA 68 or NFPA 69. The explosion prevention system that is provided will be designed to direct overpressure, and any other explosive events or flammable gases, away from the Battery Unit.

The RMP acknowledges the BMO and Bushfire Prone Area as legislative controls in Victoria that regulate planning and building systems. The subject land is located more than 2km from the BMO and the BPA covers the whole of the site and surrounding land. Recent bushfire history in the surrounding landscape includes a bushfire in 2010 to the north of the site, which moved through North Winton and the Lake Mokoan area, and impacted 759 hectares of land. The available data does not indicate any bushfire impact on the subject site.

The risk assessment is structured to assess risk using the following frameworks:

- Assessment against Clause 13.02 – 1S of the Benalla Planning Scheme.
- Assessment against the requirements of the CFA Guidelines Design Guidelines and Model Requirements: Renewable Energy Facilities 2023 including the Fire Safety Study requirements outlined within the NSW Planning Guidelines.
- Risk assessment that meets section 5 of the CFA Guidelines.

The potential bushfire hazards and scenarios that may impact the site are outlined within Table 4-2 below.

Table 5-3 Assessment against Clause 13.02 (from RMP)

Bushfire Hazard Type	Conditions	Likely Scenario	Considerations
The site for development	<p>Once completed, the BESS will comply with the conditions specified within the CFA Guidelines that include the management of vegetation around the Project site during the fire danger period.</p> <p>During construction, there is a risk of a fire igniting and spreading through unmanaged grassland vegetation.</p>	<p>A bushfire starting on the property is a possibility during the construction phase of the Project.</p> <p>Fires starting because of construction or operational activities have the potential to leave the property and enter adjoining areas. There is sufficient grassed areas and connectivity in some directions for a fire to spread rapidly under elevated fire danger conditions.</p> <p>Management of vegetation during the construction phase will occur regularly and be maintained during the fire danger period.</p> <p>Following construction the Project will have either all vegetation removed or managed as per the requirements of the Fire Management Plan that conforms with the CFA Guidelines.</p>	<p>During the construction phase, if the vegetation on site is retained, it will be managed during the fire danger period.</p> <p>During the fire danger period the grassed areas will be managed as per the CFA Guideline requirement. Hot works are not to occur within 10 metres of vegetation (including grass and other plants) during the fire danger period.</p> <p>When the fire danger conditions are elevated (Catastrophic Fire Danger Rating), the Emergency Management Plan will outline procedures to close the site during the construction phase and limit operations unless critical.</p> <p>The access roads will be established at the commencement of the construction phase and be maintained for the life of the Project.</p>
Neighbourhood and local conditions (1 km)	<p>Within one kilometre of the development, the surrounding landscape is generally grassland with some groups of woody vegetation associated with roads or private property.</p> <p>Directly to the west of the site is woody vegetation associated with the neighbouring property. The total area of this vegetation on this property is approximately 9.7ha and is more than 200m from the BESS. This vegetation may allow for some ember generation to impact the subject site.</p> <p>There is also the potential for</p>	<p>The likely scenario is for a fire to start in the broader landscape and travel towards the site under north westerly or south westerly wind conditions. Under strong wind conditions a grassfire can travel quickly across the landscape. Grassfires are heavily influenced by the quantity of fuels within the paddocks and the wind strength.</p> <p>Roadsides may contribute to bushfire spread when they haven't been managed prior to a bushfire commencing.</p> <p>When the fire reaches the property to the west or Bill Friday Swamp, embers may be</p>	<p>The vegetation management around the BESS will limit the impact of a fire. Under reduced fire danger conditions, surrounding roads may slow or stop the fires spreading towards the development.</p> <p>The vegetation management requirements will limit the chances of a bushfire starting on the site and impacting on the surrounding landscape.</p> <p>The BESS area and associated infrastructure will be provided with adequate setback from</p>

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	<p>a fire to start within the Winton Wetlands. Winton Wetlands generally consists of grassland with some eucalyptus vegetation. This will likely result in some ember generation as the fire moves towards the site.</p> <p>There is also the potential for a bushfire to start along the surrounding road network grassland environment and spread towards the Project.</p> <p>The surrounding road network provides access and egress opportunities for emergency services.</p>	<p>generated.</p>	<p>unmanaged vegetation.</p>
<p>Landscape conditions (20km)</p>	<p>The landscape hazard surrounding the development mostly consists of grassland associated with agricultural land. There are some forested areas in the broader landscape that may elevate the landscape hazard, including:</p> <ul style="list-style-type: none"> • Mount Meg Nature Conservation Reserve 9km to the northwest / North, • Reef Hills State Park 17km to the southwest on the western side of Benalla, and • Warby-Ovens National Park 9km to the northeast. 	<p>The likely bushfire behaviour that will result in the greatest intensity and risk to the development is typically from either the northwest or southwest. In the context of this development, the areas to the northwest and southwest are grasslands with some fragmentation introduced by roads. Forested areas are also present to the northwest and southwest, however, are considered small enough and far enough apart to limit the intensity of a bushfire travelling through this area.</p> <p>To the northwest, the closest forested vegetation is located more than 9 km from the site. Embers may travel towards the site and start grassfires closer to the site. However, impacts from the grass fires can be managed through standard vegetation management on site.</p> <p>To the southwest, the closest forested vegetation that is considered a landscape hazard is 17km from the site and is unlikely to result in ember attack due to the distance from the site.</p> <p>The most likely fire impact is from a grassfire impacting the site from the northwest or southwest.</p>	<p>The protection of the Project through the provision of vegetation management arrangements will reduce bushfire intensity.</p> <p>The vegetation management arrangements will be effective regardless of the fire starting locally or having travelled to the site.</p> <p>The provision of multiple access roads will increase the ability for firefighters to access the areas surrounding the Project.</p>

The assessment provided against the provisions of Clause 13.02-1S demonstrates the following:

The development is within an area where bushfires are possible, but unlikely to directly impact the site. The bushfire risk is minorly influenced by the forested areas to the northwest and southwest. However, the impact to the site is most likely going to be from grassfires that start in the local area or spread from the landscape.

The Project has been designed to limit both the potential impact from grassfires impacting the site and to limit the risk of fires leaving the property and entering the surrounding landscape. As the development is required to achieve the requirements outlined within the CFA Guidelines as a minimum, this will ensure that the settlement planning objectives are achieved.

Assessment against the CFA Guidelines is also provided in the RMP, which addresses fire risk requirements within renewable energy installations. This includes the requirement for a Fire Management Plan, which will outline detailed requirements for the provision and maintenance of fire management treatments, summarised as follows:

1. *Access to the site to include full perimeter access to the BESS area, including appropriate widths and load limits from access gates.*
2. *Perimeter firebreak of 10 metres from screening vegetation, as well as a 10m firebreak around property infrastructure.*
3. *Provision of a static water supply (576,000 litres) made of concrete or steel and located more than 10 metres from any infrastructure.*
4. *Fire hydrant system that complies with AS2419.1, and booster assembly and pumps that enables appropriate pressures at the fire hydrant.*
5. *Minimum fire water retention of 576,000 litres.*
6. *Fire Management Plan as per the requirements of the CFA Guidelines.*
7. *Emergency Management Plan as per the requirements of the CFA Guidelines.*
8. *Emergency Information Book and Emergency Information Containers located at the primary access entrance.*

A detailed Risk Assessment has been conducted by FRC in accordance with the requirements of Section 5 of the CFA Guidelines, with consideration for the potential hazards relating to BESS infrastructure at the design, construction and operation phases of the Project.

The analysis of the fire risk states that BESS infrastructure is largely acknowledged as having limited potential to cause fires. It goes on to say:

'Fires have occurred previously and where possible these have been considered during the assessment of risk outlined in this report. The occurrence of fires in large scale battery packs is not common. Fires have occurred and these are usually contained to a single battery pack. The range of sensors that are fitted to the systems will in most cases enable the early shut down that will prevent thermal runaway from occurring.'

The risk identification section of the report identifies hazards including electrical hazards, fire causing spread to adjoining infrastructure, fire causing offsite impacts, fire on the site, fire water runoff, dangerous goods exposure and danger to staff and firefighters. The likelihood and consequence of each risk is assessed and included in Table 11 – 18 in the Risk Assessment report, based off the Risk Matrix shown in Figure 4-3 below.

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			Impact Score				
			1	2	3	4	5
			Insignificant	Minor	Moderate	Major	Catastrophic
Fire Risk Consultants Risk Assessment Matrix	People	Slight Injuries- First Aid Treatments (cuts/bruises)	Significant Injuries - Medical Treatment, non-permanent injury	Major Injuries - Incapacitations or requiring time off work	Single Fatality or Permanent Disability	Multiple Fatalities	
	Environment	Short term damage / Low financial loss, negligible environmental impact	Limited but medium term damage / On-site release immediately contained	Major but recoverable ecological damage / On-site release contained with outside assistance	Heavy ecological damage with costly restoration / Off-site release contained with outside assistance and little detrimental impact	Permanent widespread ecological damage / Toxic release off-site with detrimental effect / Likely EPA prosecution	
	Plant / Equipment	Slight Damage (< \$10 000)	Component level replacement /repair (\$10 000 - \$50 000)	Equipment level replacement /repair (\$50 000 - \$200 000)	Multiple equipment replacements (\$200 000 - \$1M)	Massive widespread equipment damage (ie plant/equipment write-off) (\$1M +)	
Likelihood	A	Almost Certain The event is expected to occur in most circumstances / 75%-99% / Has occurred frequently at the location	Low (5)	Moderate (10)	Very High (18)	Extreme (23)	Extreme (25)
	B	Likely The event will probably occur in most circumstance / 50% - 75% / Has occurred frequently in the company	Low (4)	Moderate (9)	Very High (17)	Very High (20)	Extreme (24)
	C	Possible The event should occur at some time. Likely to occur some time / 25% - 50% / Has occurred many time in the industry, but not in the company	Low (3)	Moderate (8)	High (13)	Very High (19)	Very High (22)
	D	Unlikely The event could occur at some time. Unlikely but possible / 10% - 25% / Has occurred once or twice in the industry	Low (2)	Low (7)	High (12)	High (15)	Very High (21)
	E	Rare The event may occur only in exceptional circumstances. Assumed it may not be experienced / 0% - 10% / Unheard of in the industry	Low (1)	Low (6)	Moderate (11)	High (14)	High (16)

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Figure 5-3 Risk Matrix in the Fire RMP

The RMP ultimately concludes that the proposed Winton BESS provides a design, layout and siting which can meet the requirements of the CFA Guidelines. This includes two access points to the BESS Site, located on Bowers Road and Lee Road. The RMP indicates that the Lee Road access point is likely to be the primary access point for firefighting purposes.

Additionally, the systems and mitigation procedures to be implemented during the design, construction and operation of the Project will ensure the fire risks identified in the report can be sufficiently managed to an acceptable level.

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5.1.2.3. Natural Resource Management

Agriculture

It is considered that agricultural issues are not a key consideration for the purpose of this application, having regard for the footprint of the proposed BESS, the minor loss of agricultural land (approximately 3.5 hectares) within the context of the overall site (approximately 30 hectares), and the limited productive potential of the site due to the moderate soil quality and low recent fertilizer history. Further, the site is of no strategic importance from an agricultural or productivity perspective.

Notwithstanding, it is submitted that the proposal is responsive to the provisions of Clause 14.01 (Agriculture), and specifically Clause 14.01-1S and 14.01-2S.

Due consideration has been given to the impacts of removing the land from primary production based on its agricultural productivity, the impacts of the continuation of primary production on nearby land, compatibility between the Project and the existing uses of the surrounding land, and the potential impacts of the spread of plant and animal pests into agricultural areas.

The proposed BESS is located in the north-east corner of the site, allowing for the ongoing use of the other paddocks on the lot for farming.

Hydrology

A Hydrological Report has been prepared by Cumulus Engineering (included at Appendix I), which provides a detailed assessment of flooding and stormwater impacts associated with the proposed BESS. In turn, this assessment has recommended management strategies for the Project relating to floodplain management and stormwater quality and quantity to appropriately mitigate any potential flood risks.

This assessment has informed the design and siting of the Project, to ensure stormwater runoff from the site is appropriately managed, through best practice stormwater treatment.

The assessment includes modelling for the existing conditions and design scenarios, as well as the 1% AEP flood event for existing and proposed conditions at the site. A summary of the key findings from the hydrological modelling and analysis of the site and surrounds is provided below:

1% AEP Results (Proposed design conditions)

- *The results of the 1% AEP design conditions indicate that overall flood behaviour remains largely consistent with existing conditions, however the raised fill pad has resulted in some localised changes to flood levels, including both increases and decreases. A minor increase in flood level of up to 72mm is observed on the adjoining property to the east. This afflux is confined to a small, localised area adjacent to the eastern boundary of the subject site.*
- *The flood hazard classification across most of the site is H1 (no restrictions). Localized areas of increased hazard are present, including H2 (unsafe for small vehicles) along the southern edge of the BESS footprint and H3 (unsafe for vehicles and the elderly) at the northwest low point area. The proposed alternative road to Bowers Road, as shown in the design layout plan, is generally classified under H1 (no restriction) with only a small proportion that is just south of the raised pads, indicating moderate risk for vehicle access during flood conditions.*
- *From the south-western to the south-eastern boundaries of the blocked BESS footprint, there are notable increases in water levels, reaching up to 336mm. Conversely, the area north of the raised pads*

Dispared by Cumulus Engineering (included at Appendix I), which provides a detailed assessment of flooding and stormwater impacts associated with the proposed BESS. In turn, this assessment has recommended management strategies for the Project relating to floodplain management and stormwater quality and quantity to appropriately mitigate any potential flood risks.

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as well as along the northern boundary of the site, experiences decrease in water levels, with reductions ranging from 17mm to 56mm.

Ultimately, the report concludes that while the design introduces localised increases in water heights, these changes are minor and do not significantly impact the overall floodplain dynamics.

The assessment recommends the incorporation of the following design features for emergency management into the Project to suitably mitigate potential flood risks and stormwater impacts:

- A cut-off drain along the southern boundary of the BESS should be included to direct runoff around the BESS and to north-east corner of the site. This will mitigate the afflux observed on the boundary of the property east of the subject site, as well as any ponding along the southern side of the BESS fill pad.
- The fill pad should be raised above the applicable 1% AEP flood level and the base of the batteries/racks/containers set at a minimum 300mm above the 1% AEP flood level.
- The primary access track to Lee Road should be raised due to local ponding in that area with a culvert included near the front entrance.
- An emergency flood-free access route from the BESS site to the south-west exit of the site via Bowers Road should be incorporated into the design to ensure flood-free access in a 1% AEP event.

Based on the assessment completed, the Project site has the capacity to satisfy criteria for appropriate management of water quality and flood impacts. It is therefore submitted that the Project is consistent with relevant provisions of Clause 14.02 (Water), the objective and strategies of Clause 12.03-1L (River and riparian corridors, waterways, lakes, wetlands, and billabongs), and the objectives and strategies relating to floodplain management contained within Clause 13.03-1S.

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5.1.2.4. Built Environment and Heritage

The Project is assessed to be consistent with the relevant objectives and related strategies under Clause 15, as the siting, scale, and appearance of the proposed BESS is assessed to protect rural character, protect the visual amenity of surrounding rural landscape, and minimises visual impacts on surrounding natural scenery and landscape features.

A detailed assessment of visual amenity and landscape matters is provided in the Visual Impact Assessment at Appendix E, which includes photomontages illustrating the integration of the proposed BESS and associated infrastructure within the surrounding environment, as viewed from Lee Road, the adjoining property to the west, and the Hume Freeway.

Clause 15.03-1S ‘Heritage conservation’ has the objective to ensure the conservation of places of heritage significance, while clause 15.03-2S ‘Aboriginal cultural heritage’ has the objective to ensure the protection and conservation of places of Aboriginal cultural heritage significance.

The Project is consistent with these objectives and their related strategies. This includes the protection of natural heritage sites and man-made resources, encouraging appropriate development that respects places with identified heritage values, ensuring an appropriate setting and context for heritage places is maintained or enhanced, identifying and assessing places of Aboriginal cultural heritage significance, and providing for the protection and conservation of pre-contact and post-contact Aboriginal cultural heritage places.

Cultural Heritage

The Winton BESS is considered a high impact activity under the Aboriginal Heritage Regulations 2018 as a utility installation, other than a telecommunication facility, where there works affect an area exceeding 25 square metres. However, the project is not located within an area of cultural heritage sensitivity. A mandatory CHMP is therefore not required for this project.

5.1.2.5. Economic Development

The Project is broadly consistent with the provisions of Clause 17 (Economic Development) and will support the rural economy to grow and diversify as well as facilitating employment in the region’s emerging renewable energy and storage sector.

The project is anticipated to create approximately 80-90 full time equivalent (FTE) construction jobs, as well as 1-2 FTE ongoing operation jobs. Additionally, the project will provide a positive contribution to the local economy, through increased revenue associated with accommodation, food, and other services in the local area.

5.1.2.6. Transport

The project is assessed to appropriately respond to the relevant objectives and strategies under Clause 18 (Transport), with specific reference to Clause 18.01-1S, 18.02-4S, and 18.01-2L. This includes the need to protect existing transport infrastructure and the Principal Road Network, and to provide adequate supply of appropriately designed and located car parking on site.

A Traffic Impact Assessment has been prepared by Impact Traffic Engineers and is included in Appendix G.

A summary of the Assessment and proposed Traffic/car parking conditions associated with the proposed BESS site is provided below:

- Access to the BESS site is afforded from Bowers Road and Lee Road for all construction and staff movements. These access points are shown in Figure 1-1 above.
- It is considered that existing conditions along Bowers Road and Lee Road can accommodate the construction traffic associated with the proposed BESS without the provision of passing bays or major road upgrades required.
- A detailed car park design has yet to be determined, however it is assumed that during construction, vehicles will be parked either at designated laydown areas, storage locations, or where construction activities are occurring. The report notes that during operations, operational and maintenance staff vehicles will be accommodated on-site within a vehicle parking area located adjacent to the site office.
- Swept path analyses show that the BESS site access will be able to cater for 26 m B-double vehicles into and out of the site.
- An assessment of the ability of OSOM vehicles to access the BESS site and AusNet Glenrowan Terminal Station will need to be undertaken as part of the NHVR application process to confirm if any temporary traffic management measures will be required for the haulage of any over-sized deliveries.
- A desktop assessment of sight distances has been undertaken and indicate that the proposed BESS site access points have site lines of at least 300m in each direction – see Figure 4-4 and 4-5 below.

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Figure 5-4 Bowers Road Site Access - Sight Distance Assessment (Source: Impact Traffic Consultants, 2025)



Figure 5-5 Lee Road Site Access - Sight Distance Assessment (Source: Impact Traffic Consultants, 2025)

- Having regard for the existing conditions at the Bowers Road/Hume Freeway intersection, it is anticipated that restricting right-in and right-out movements where possible for heavy vehicles may be required, given the median break in the Freeway.
- Existing local road conditions at the proposed BESS site access points along Bowers Road and Lee Road can accommodate the passing of turning vehicles via the road pavement and shoulder, without the provision of a basic right turn (BAR), given these movements are temporary.
- The anticipated peak construction traffic volumes for the proposed BESS is estimated to be 52 vehicles if all staff were to primarily drive to the site, comprising 40 light vehicles, and 12 heavy vehicles.
- A further reduction in vehicle movements can be achieved by transporting workers to and from site via shuttle bus movements, or car-pooling, though this is not considered a necessary mitigation measure.
- It is noted that the Winton BESS is proposed to commence construction mid-2028 over a 12-month period, while the nearby Winton Energy Reserve 1 Facility is schedule to commence in 2026 over a

12-18 month period. Cumulative traffic impacts arising from both projects has therefore been considered in the Traffic Impact Assessment, though any cross-over in the construction periods and associated traffic is anticipated to be minimal give the respective construction timelines.

- Conservatively assuming that the peak construction activities of both projects coincide, 164 peak hour movements along Bowers Road would be anticipated. While this is a significant increase in the context of the local road network, it is expected that these short-term movements would be manageable.
- The short-term increase in traffic movements may result in the need for more frequent maintenance/repair work to the local road network.
- In relation to operational traffic, it is estimated that the BESS site will have up to four (4) daily vehicle movements associated with routine maintenance during operations. There will also be, on occasion some additional movements associated with more thorough maintenance. This level of traffic will be negligible and have no discernible impact on the operation of the surrounding road network.

Additionally, a summary of the proposed access points and anticipated volumes for construction traffic associated with the underground cabling works, and works within the Glenrowan Terminal Station, is provided below:

- Construction access for works associated with the Glenrowan Terminal Station is proposed via the primary entrance to the site via Glenwest Lane.
- Construction access for works associated with the underground cabling is proposed via a road reserve access point to the north of the Glenrowan Terminal Station lot, shown in the layout plan at Figure 1-1.
- The anticipated peak construction traffic volumes for works within the Glenrowan Terminal Station lot is expected to be 8 light vehicles per day and approximately 89 heavy vehicles per week, as well as a total of 4 non-high risk CSOM vehicles over a 6-month period.
- Anticipated peak construction traffic volumes for the underground cabling works is estimated to be 8 light vehicles and 6 heavy vehicles.

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The report recommends that a detailed Traffic Management Plan (TMP) be prepared once the project design is complete and prior to commencement of the project construction to confirm the requirements, particularly for sight distances and for mitigation / management works. The TMP would include traffic management requirements for construction traffic associated with the Terminal Station and underground cabling works, in coordination with AusNet and other stakeholders as required.

The report concludes that there are no traffic and transport grounds that should prohibit the issue of a permit.

5.1.2.7. Infrastructure

The project is considered to accord with the direction and relevant strategies of Clause 19.01-1S, 19.01-2S, and 19-01-2R, most notably as the proponent seeks to support the provision and use of renewable energy with a new Battery Energy Storage System. The proposal has appropriately taken into consideration all relevant design and siting requirements to mitigate environmental and amenity impacts.

Having regard for the number of renewable energy facilities (existing and approved) in close proximity to the subject site, the proposal also directly addresses the strategy under Clause 19.01-1R to create renewable energy hubs that support co-location of industries to maximise resource use efficiency and minimise waste generation.

It is submitted that the Project is consistent with the direction provided, including to consider the economic, social, and environmental benefits to the broader community of renewable energy generation and storage while also considering the need to minimise the effects of a Project on the local community and environment.

The Project is ideally located near an existing substation with ready access to existing roads (including the Hume Freeway), outside of a declared irrigation district and not on state-significant productive agricultural land. There are a limited number of nearby sensitive receivers surrounding the site, in an area where there is relatively low risk to natural hazards. Further, the Project has been designed to suitably avoid, minimise, and offset the removal of native vegetation.

5.1.3. Farming Zone

Pursuant to clause 35.07-6, before deciding on an application, the responsible authority must consider the following decision guidelines, as appropriate.

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 makes use of existing infrastructure and services.*

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.*

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 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.*

Design and siting issues

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- 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 following assessment is provided against the decision guidelines that are relevant to this proposal.

General issues

- As detailed above, the Project is assessed to accord with the PPF. Additionally, the Project is consistent with the vision and strategic directions of the Municipal Planning Strategy.
- The Project site is suitable for the use and development, being largely cleared of native vegetation, adjacent to the existing electricity network, a sufficient distance from existing urban areas, adequately distanced from other renewable energy facilities, away from floodplains as well as major water courses and wetlands, with ready access to main roads, and outside of a declared irrigation district.
- The Project is compatible with adjoining and nearby land uses, with surrounding land being primarily used for agricultural activities and renewable energy facilities. There are several dwellings near to the Project site, but it is assessed that any amenity or other impacts on these sensitive uses are acceptable.

The Project makes suitable use of existing infrastructure, including the electricity network and road network.

Agricultural issues and the impacts from non-agricultural uses

- While the Project will not directly enhance agricultural production, it will support agricultural production. The project will support the diversification of income streams, which can increase the resilience of primary producers.
- The Project is not considered to have any adverse effects on the ability of surrounding property owners to use their land for agricultural purposes, and will have negligible impact on the agricultural sector in the wider region.
- The agricultural qualities of the land are of no strategic importance. The land is like much of the surrounding farmland, with mostly moderate quality soils. The Project would not have a significant impact on the overall productivity of the region or the state.
- The footprint of the proposed BESS is approximately 3.5 hectares. The remaining area of approximately 30 hectares will retain the capacity for agricultural operations. Given the site cannot be irrigated, it is anticipated that any future agricultural activities at the site would be primarily dryland grazing.

This is discussed further in the Agricultural Assessment provided by Meridian Agriculture (2025) – see Appendix J. As detailed in this assessment, the proposed BESS will have no long-term detrimental impacts on the productive capacity of the soil, the overall productivity of the region, or the ability of neighbouring agricultural businesses to operate. The soils at the site are of moderate quality, with low recent fertilizer history which limits their productive capacity. Additionally, it is noted that the site is not located within an irrigation district.

Environmental issues

- The Project will have limited and acceptable impacts on the natural physical features and resources of the area, including soil and water quality. The operation of the Project presents no significant issues, while the construction process can be managed to avoid, mitigate, and remedy any potential environmental impacts.
- While the Project involves the removal of native vegetation, the relevant three-step approach of ‘avoid, minimise, and offset’ has been appropriately followed. Native vegetation matters are addressed in further detail in this report. The Project is expected to have limited and acceptable impacts on any flora and fauna on the site and in the surrounds.
- The Project is assessed to have no significant impacts on the biodiversity of the area, with any impacts limited to the removal of native vegetation, which has been appropriately avoided and minimised, and will be offset. The provision of future landscaping will also perform a revegetating function and may provide habitat for fauna.

For further detail on the potential environmental impacts of the proposal, proposed mitigation measures, and native vegetation removal/offsets, please refer to the Ecological Assessment provided by Biosis (2025) at Appendix D.

Design and siting issues

- The Project will have limited and acceptable visual amenity and landscape impacts and suitably minimises any adverse impacts in terms of siting, design, height, bulk, and materials. This is further addressed in the assessment of landscape and visual amenity matters above, and in the Visual Impact Assessment provided at Appendix E.
- The Project has limited and acceptable impacts on the character and appearance of the area as well as features of historic or scientific significance or of natural scenic beauty or importance.
- The Project has been designed and located to take account of existing infrastructure, including roads powerlines, and the existing Glenrowan Transmission Substation.
- While the Project is not expected to require significant traffic management measures during its operation, it will require such measures during its construction. It is anticipated that any permit that is issued will require the preparation and approval of a TMP. It is expected that suitable measures can be found and implemented. Traffic matters are commented on in further detail in this report above. Additionally, all relevant traffic considerations associated with the proposal have been assessed and provided in the Traffic Impact Assessment, prepared by Impact Traffic Engineering (2025), at Appendix G.

Based on the above, the Project is assessed to meet the purposes of the FZ and is consistent with the relevant decision guidelines.

5.1.4. Transport Zone 2

Pursuant to Clause 36.04-5, before deciding on an application, the responsible authority must consider the following decision guidelines, as appropriate:

- *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.*

It is considered that the proposal is consistent with the purpose and decision guidelines of Clause 36.04, having regard for the design and siting of the proposed BESS, and the proposed new accessways, and any potential effect on the operation and safety of the Hume Freeway and surrounding road network. The proposed use and development of the underground cabling is consistent with the provisions of Clause 36.04, and has been sited to ensure there would be no adverse impacts upon the operation and safety of the transport system.

Potential traffic impacts of the proposal are discussed under the Transport assessment above, while a comprehensive Traffic Impact Assessment is provided at Appendix G. That assessment ultimately determines there are no traffic and transport grounds that should prohibit the issue of a permit.

The design and route of the proposed underground cabling within the TRZ2, which will connect the BESS with the Glenrowan Terminal Substation, has been designed in collaboration with VicRoads and Benalla Rural City Council, and with regard to the location of existing easement routes.

Accordingly, there would be no adverse impacts on the safety and operation of the Hume Freeway resulting from the construction of the proposed underground cabling.

5.1.5. Vegetation Protection Overlay – Schedule 3

Schedule 3 to Clause 42.02 relates to the Regent Honeyeater Habitat/Lurg Ironbark Vegetation Protection Area. The VPO3 includes the following decision guideline, in addition to those listed under Clause 42.02-5:

- *The recommendations of the “Regent Honeyeater Recovery Plan”, Department of Natural Resources and Environment 1997, and the status of vegetation shown on the map series “Remnant Vegetation of the Lurg Hills”, Sally Mann and Doug Robinson, 1992.*

The VPO3 does not affect the subject site, however it covers the eastern section of the proposed connection route to the Glenrowan Terminal Station.

A detailed assessment of the project against the provisions of the VPO3 is provided under Section 4.2.3 of the Flora and Fauna Assessment completed by Biosis (Appendix D). The majority of remnant and planted tree species to be removed are Grey Box and River Red-Gum, which are not listed in the VPO. Additionally, the assessment notes that natural mature strands of Mugga Ironbark along Winton-Glenrowan Road will be avoided where the connection route enters Glenrowan Terminal Station.

5.1.6. Land adjacent to the Principal Road Network (Clause 52.29)

The proposal includes a new site access point to Bowers Road, which is located just within the Transport Zone 2, and therefore requires a permit under Clause 52.9-2.

Clause 52.29-6 lists the following decision guidelines which the responsible authority must consider, in addition to those listed under Clause 65:

- *The Municipal Planning Strategy and the Planning Policy Framework*
- *The views of the relevant road authority*
- *The effect of the proposal on the operation of the road and on public safety*
- *Any policy made by the relevant road authority pursuant to schedule 2, clause 3 of the Road Management Act 2004 regarding access between a controlled access road and adjacent land.*

As noted above, a Traffic Impact Assessment has been prepared for the project and is provided at Appendix G. This includes a comprehensive assessment of the proposed new access to the site off Bowers Road, and

concludes that sufficient sight distances of at least 300m, and the necessary design requirements can be provided for this access to ensure it does not result in any adverse impacts in terms of road or public safety.

5.1.7. Signage

The proposed signage is to be located on the front fence/gate at the Bowers Road proposed site access point, and is located within the Transport Zone 2. Pursuant to Clause 36.04-6, there is no permit trigger for the proposed signage under the Transport Zone. The sign category which applies to signage within the TRZ2 is the category which applies to the adjoining zone nearest to the land (Farming Zone). The applicable category for signage requirements within the Farming Zone is Category 4.

The main site access gates will display a business identification sign with a total area not exceeding 3sqm. The signage shows the Avenis business name and logo, with some information.

The proposed signage is appropriate for the development, will not impact on any views or vistas, is discrete and purely for basic business signage.

6. Community engagement and benefit sharing

The Proponent is committed to both community engagement and benefit sharing for this project. A Community Engagement Strategy and reporting has been prepared for the project and is included in Appendix K Community Engagement Summary Report.

This assessment has applied a broad engagement approach, aiming to gather insights into the current state of community sentiment towards the Proposal through a community information session and targeted stakeholder meetings. Additional engagement methods included two rounds of posted letters, emails, phone calls, provision of Project materials (Fact Sheet and FAQ), and an online survey.

Engagement was conducted with sensitive receivers and broader community members, and worked to address queries, concerns, and opportunities.

Community and stakeholder engagement included multiple in-person conversations with non-associated receivers and community members, a pop-up information session, face-to-face meetings with Council and other stakeholders, 84 posted letters, 3 phone calls, 62 emails to targeted stakeholders, and online meetings with Members of Parliament and Council representatives.

A summary of the opportunities and concerns identified in relation to the project is provided below:

Opportunities	Challenges
<ul style="list-style-type: none"> • Potential for community benefit sharing tailored to the Benalla and Winton communities, with a focus on accessible and lasting legacy outcomes. • Exploration of potential agricultural and environmental uses for residual land. • Opportunities for local partnerships, including a 7-hectare vegetation planting 	<ul style="list-style-type: none"> • Cumulative impacts during the construction period, particularly when considering nearby developments. • Concerns in relation to visual impact • Concerns regarding noise during both construction and operation phases. • Access and traffic management during construction.

<p>initiative and potential landscape linkages or ecological corridors.</p> <ul style="list-style-type: none"> • Interest in a potential new or modified bus route servicing Bowers Road. • Potential for worker accommodation to be delivered in partnership with Winton Raceway. 	<ul style="list-style-type: none"> • Personal property impacts: <ul style="list-style-type: none"> ○ Land devaluation ○ Increases in property insurance • Differentiating the Project from surrounding solar farms • Fire management or reputation of BESS's + fires
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The outcome of this assessment includes recommendations on how to continue developing positive relationships for the Proposal as it progresses through to the Development Application and Statutory Notice period.

7. Conclusion

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The proposed Winton BESS has been assessed against the relevant provisions of the Benalla Planning Scheme, with specific reference to Clause 35.07 (Farming Zone), Clause 36.04 (Transport Zone), Clause 53.13 (Renewable Energy Facility) and applicable guidelines for energy facilities.

The balance of policies strongly supports the BESS facility at the proposed location. The site has low agricultural significance and is not within an irrigation district.

Ecological impacts are minimal and acceptable, with only 0.646 hectares of native vegetation affected. Appropriate offsets will be provided in accordance with Clause 52.17, and the ecological assessment completed by Biosis confirms no significant risks to local biodiversity.

Bushfire risk will be managed to an acceptably low-level following CFA Guidelines. As detailed in the Fire Risk Management Plan, the Project design provides comprehensive fire management systems, including a Battery Management System (BMS) and permitter fire breaks, to effectively mitigate potential fire hazards.

The proposed BESS will have minimal impact on the amenity of the surrounding area regarding noise, light spill, vibration, smell, and electromagnetic interference. Noise levels will comply with the EPA Noise Protocol, ensuring no adverse effects on nearby sensitive receptors.

The Landscape and Visual Impact assessment demonstrates that the proposal can sit comfortably within the landscape and not result in any significant visual impacts to sensitive receivers or public realm locations. Landscape screening will further soften the views to the site.

There will be no significant impact on local roads, and ongoing operational impacts are expected to be negligible. The design ensures that significant views, including visual corridors and sightlines, are preserved.

It is respectfully submitted that the proposed BESS is consistent with relevant policies and warrants the issuance of a planning permit, subject to conditions. Furthermore, the proposal includes appropriate measures for community engagement and ongoing ecological monitoring, ensuring that any potential residual impacts are effectively managed.

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Appendix A - Proposal Plans

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Appendix B – Certificate of Title

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Appendix C – Title Re-establishment / Feature & Level Survey

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Appendix D Flora and Fauna Assessment

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Appendix E - Visual Impact Assessment

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Appendix F – Noise Impact Assessment

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Appendix G – Traffic Impact Assessment

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Appendix H - Fire Risk Management Plan

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Appendix I - Hydrological Assessment

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Appendix J - Agricultural Impact Assessment

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Appendix K Community Engagement Summary Report

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Appendix L Written Consent of the Head, Transport for Victoria

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SYDNEY REGION

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Surry Hills NSW 2010
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BEGA

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NEWCASTLE - HUNTER & NORTH COAST

2 Dick Street
Newcastle West NSW 2302
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WAGGA WAGGA - RIVERINA & WESTERN NSW

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Wagga Wagga NSW 2650
T. (02) 6971 9696

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SUNSHINE COAST

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WODONGA

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