



Powering a Sustainable Future

Viewbank Solar Farm

Planning Assessment Report

19 February 2021

Project No.: 0493694

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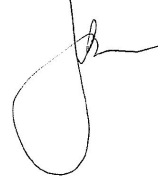
19 February 2021

Viewbank Solar Farm

Planning Assessment Report



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CONTENTS

EXECUTIVE SUMMARY	VII
1. INTRODUCTION	1
1.1 About FRV	1
2. SITE DESCRIPTION AND ANALYSIS	2
2.1 Subject Site.....	2
2.2 Area	8
2.3 Native Vegetation	8
2.4 Waterway.....	8
2.5 Heritage	8
3. PROPOSAL.....	10
3.1 Project Description.....	10
3.2 Infrastructure Connections and Licences.....	11
3.3 Vegetation Removal	12
3.4 Traffic and Access	12
3.5 Construction Process.....	12
3.6 Stakeholder Engagement and Community Benefits	13
4. RELEVANT VICTORIAN PLANNING PROVISIONS	14
4.1 State and Regional Planning Policy Framework	14
4.2 Local Planning Policy Framework	14
4.3 Planning Controls	16
4.3.1 Farming Zone	16
4.3.2 Road Zone	17
4.4 Overlays.....	17
4.4.1 Land Subject to Inundation Overlay	17
4.4.2 Floodway Overlay	17
4.5 Particular Provisions	18
4.5.1 Clause 52.17 – Native Vegetation.....	18
4.5.2 Land Adjacent to a Road Zone, category 1.....	18
4.5.3 Clause 53.13 – Renewable Energy Facility (Other Than Wind Energy Facility).....	18
4.5.4 Referral Provisions.....	18
4.6 Other Relevant Documents.....	20
4.6.1 Solar Energy Facilities Design and Development Guidelines (Department of Environment, Land, Water and Planning, 2019)	20
4.6.2 The Hume Regional Growth Plan	20
4.6.3 Goulburn Broken Regional Catchment Strategy	21
4.6.4 Greater Shepparton Floodplain Development Plan (Precinct of Mosquito Depression)	21
4.6.5 Clause 9 of the Incorporated Document – Earthworks Controls in the Shire of Campaspe City of Greater Shepparton and the Moira Shire August 2015.....	22
4.6.6 Goulburn Broken Catchment Management Strategy	23
5. PLANNING ASSESSMENT	23
5.1 Renewable Energy, Employment and Social Benefits	23
5.1.1 Renewable Energy Production and Sustainable Development.....	23
5.1.2 Economic Benefit	24
5.2 Renewable Energy Facility Planning Particular Provision.....	24
5.3 Impact on Agricultural Land and Irrigated Land	25
5.3.1 Irrigated Land.....	25
5.3.2 Agricultural Land.....	28
5.3.3 Similar Planning Applications for Solar Energy Facilities	32

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PLAN**

5.3.4	Engagement with GMW	33
5.4	Amenity Impacts	33
5.4.1	Reducing Impact to Neighbouring Properties	33
5.4.2	Landscape and Visual Impact/Photomontage.....	35
5.4.3	Glare/Glint.....	35
5.4.4	Noise.....	35
5.4.5	Responding to Community Concerns	36
5.5	Biodiversity	37
5.5.1	Avoid, Minimise, Offset Statement	37
5.5.2	Potential Cumulative Impacts	38
5.6	Heritage	39
5.7	Traffic.....	39
5.7.1	Traffic Impact	39
5.7.2	Access	39
5.7.3	Car Parking.....	40
5.8	Surface Water Impact	40
5.9	Bushfire Risk.....	41
5.10	Managing Environmental Risks	42
6.	CONCLUSION.....	43

APPENDIX A	CERTIFICATES OF TITLE
APPENDIX B	CONTEXT FIGURES PREPARED BY ERM
APPENDIX C	LAYOUT PLANS AND INDICATIVE FIGURES BY FRV
APPENDIX D	BIODIVERSITY ASSESSMENT PREPARED BY ECOLINK CONSULTING
APPENDIX E	TRAFFIC ASSESSMENT PREPARED BY CARDNO
APPENDIX F	AGRICULTURAL ASSESSMENT BY RMCG
APPENDIX G	STAKEHOLDER ENGAGEMENT PLAN/FACTSHEET/COMMUNITY LETTER PREPARED BY KJA
APPENDIX H	SURFACE WATER ASSESSMENT BY WATER TECHNOLOGY
APPENDIX I	CORRESPONDENCE FROM GOULBURN BROKEN CATCHMENT MANAGEMENT AUTHORITY
APPENDIX J	GLINT AND GLARE ASSESSMENT BY ERM
APPENDIX K	NATIVE VEGETATION REMOVAL REPORT BY DELWP
APPENDIX L	CULTURAL HERITAGE ASSESSMENT BY ANDREW LONG AND ASSOCIATES
APPENDIX M	PHOTOMONTAGE BY GREEN BEAN DESIGN
APPENDIX N	NOISE IMPACT ASSESSMENT BY ERM
APPENDIX O	APPLICATION FORM
APPENDIX P	CFA GUIDELINES ASSESSMENT BY ERM
APPENDIX Q	VISUAL IMPACT ASSESSMENT BY GREEN BEAN DESIGN

List of Tables

Table 1 Referral Provisions.....	18
Table 2: Clause 53.13 Decision Guidelines.....	24

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List of Figures

Figure 2-1 Title Details 3
Figure 3-1 Site Layout Plan..... 11
Figure 4-1 Planning Zones and Overlays Map 16

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EXECUTIVE SUMMARY

This Planning Report supports a planning permit application for a renewable energy facility (solar farm), utility installation (battery storage facility or BESS and powerlines), minor utility installation (substation); buildings and works and native vegetation removal in Northern Victoria, within the areas known as Cooma and Girgarre East. The project is known as the Viewbank Solar Farm (the Project).

The 75 MW (AC) grid connected solar farm is expected to generate enough power to supply 37,400 typical Victorian homes. The battery energy storage system ("BESS") will be a 25MW system, which will further enable increased penetration of green, renewable energy into the National Electricity Market. The Viewbank Solar Farm will help reduce greenhouse gas emissions by up to 132,000 tonnes of CO₂ each year and will be connected to PowerCor's existing 66kV distribution network, which runs directly south of the site.

State and Regional Policy provide strong support for renewable energy facilities, with policies broadly seeking to encourage generation of renewable energy, diversification of the economy and utilisation of existing infrastructure. This support is tempered to some degree with policy seeking to protect areas of environmental, agricultural, amenity, landscape and heritage value. In this regard, renewable energy facilities, which can be achieved without unreasonably impacting the abovementioned values, should be supported.

The site is located entirely within the Farming Zone, with a Floodway Overlay and Land Subject to Inundation Overlay also affecting the subject site.

Under the provisions of the Greater Shepparton Planning Scheme, a planning permit is required for the use of the land as a renewable energy facility (solar farm) and ancillary utility infrastructure (battery storage, powerlines and a substation), to construct and carry out works associated with the proposed use and to remove native vegetation. The Renewable Energy Facility (other than Wind Energy Facility and Geothermal Energy Extraction) provisions apply to all applications that seek approval for a renewable energy facility.

Detailed assessments have been undertaken, which consider planning, biodiversity, surface water, agricultural, glint and glare and traffic implications of the proposal. All technical assessments are referred to in this report and included as part of the planning permit application. The project demonstrates compliance with the Planning Scheme. A mandatory Cultural Heritage Management Plan is required and is currently being prepared for the project.

The assessments have found that the project is supportable under the provisions of the Planning Scheme. Subject to conditions that will ensure appropriate land management, including native vegetation protection and pest and weed control, the project is not considered to pose detrimental impact to the surrounding agricultural land, amenity or safety of the area or habitat for native species, and will generate renewable energy in a location serviced by existing electricity infrastructure. In this regard, the project is considered suitable for planning support.

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1. INTRODUCTION

Environmental Resources Management Australia Pty Ltd (ERM) has been appointed by FRV Services Australia Pty Ltd (FRV) to undertake a planning assessment for a proposed solar farm on the land generally known as No 85 McCague Road Cooma (part of site) and No. 90 McCague Road Girgarre East (Viewbank Solar Farm).

This Planning Report provides the overarching explanation of the Project including an outline of the operations, potential for impacts and assessment against relevant policy provisions. Technical assessments have been conducted to inform the concept design of the Project and support the Planning Application. The key findings of these technical assessments are summarised in this report, with the assessments included as appendices to this report.

This report concludes that the Project is consistent with relevant policies and provisions of the Shepparton Planning Scheme and should be supported by way of issuing of planning approval, with appropriate conditions as identified within this report and throughout the planning assessment process.

1.1 About FRV

FRV Services Australia (FRV) is a global renewable energy solutions provider and leading solar developer.

FRV has been active in Australia since 2010 and is a leader in solar development, both in Australia and overseas. FRV was the first company to deliver a Project-financed solar farm (the Royalla Solar Farm near Canberra) that has been operating since August 2014. This Project was the winner of the first solar auction held by the ACT government in 2013. FRV is also responsible for the Moree Solar Farm located in northern New South Wales, which has been operating since March 2016.

FRV are in the advanced stages of construction of the Winton Solar Farm, in Winton, Victoria. The Winton Solar Farm was selected for the Victorian Renewable Energy Auction Scheme (VREAS) to support the Victorian Renewable Energy Targets (VRET) of 50% by 2030. The aim of the VRET is to reduce Victoria's greenhouse gas emissions intensity by up to 2.2 million metric tonnes. The Winton Solar Farm will create 150 jobs, and FRV continues to support and deliver other community obligations under the VRET Support Agreement.

In October 2018 FRV signed a Power Purchase Agreement with Snowy Hydro Limited for Goonumbla Solar Farm (NSW, 84MWp, operating), making Winton and Goonumbla Solar Farms, FRV's fifth and sixth large scale solar projects in Australia. In early 2020 FRV acquired Sebastopol Solar Farm (NSW, 110MWp) and signed a Power Purchase Agreement with Snowy Hydro Limited in February 2020. The Project has reached financial close and construction started in October 2020. Additionally, FRV completed the development of Metz Solar Farm in NSW and construction is expected to start before end of 2020.

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2. SITE DESCRIPTION AND ANALYSIS

This Section includes a description of the subject site and the surrounding area. Refer to Appendix B for figures illustrating the context provided below.

2.1 Subject Site

The subject site is approximately 5km east of Stanhope and 30km west of Shepparton. In relation to Melbourne, the site is approximately 200km to the north. The subject site is illustrated in Figure 2-2 overleaf.

The subject site is approximately 217 ha and is farmland that is used for cropping and grazing. While there is irrigation infrastructure located within the subject site, it is not currently irrigated.

The topography of the land is generally flat, with an elevated area to the north of the site. The property then slopes down towards the irrigation areas, which also includes a natural drainage channel and swamp that are located to the south west corner. It is noted that the site has private channels only and there are no GMW irrigation channels on site. There is an existing dwelling and associated buildings on the site at 90 McCague Road, Girgarre East to the north of the subject site. It is proposed to remove these dwellings as part of the project.

The titles, which comprise this site, are outlined below. A copy of each title is included within Appendix A.

The site comprises of six parcels of land, including:

- Allot. 4 PARISH OF GIRGARRE EAST
- Allot. 5 PARISH OF GIRGARRE EAST
- Allot. 50 PARISH OF GIRGARRE EAST
- Allot. 51 PARISH OF GIRGARRE EAST
- Allot. 53 PARISH OF GIRGARRE EAST
- Lot 1 TP119726 (part of 85 McCague Road, Cooma)

The first five listed lots are associated with the site address 90 McCague Road, Girgarre East. Lot 1 on TP119726 belongs to the address 85 McCague Road, Cooma. 85 McCague Road, Cooma is actually located to the north of the site, however Lot 1 on TP119726 is located to the south of the address. See Figure 2-1 for details.

The site also comprises the following road reserves:

Midland Highway, Girgarre East Figure 2.1 shows that the site includes part of the address '85 McCague Road' (Lot 1 on TP119726). The first image shows the entire site boundary associated with the project. The second image shows that Lot 1 on TP119726 is associated with 85 McCague Road (red outline), whilst 90 McCague Road, Cooma is highlighted and corresponds with the boundaries in the first image.

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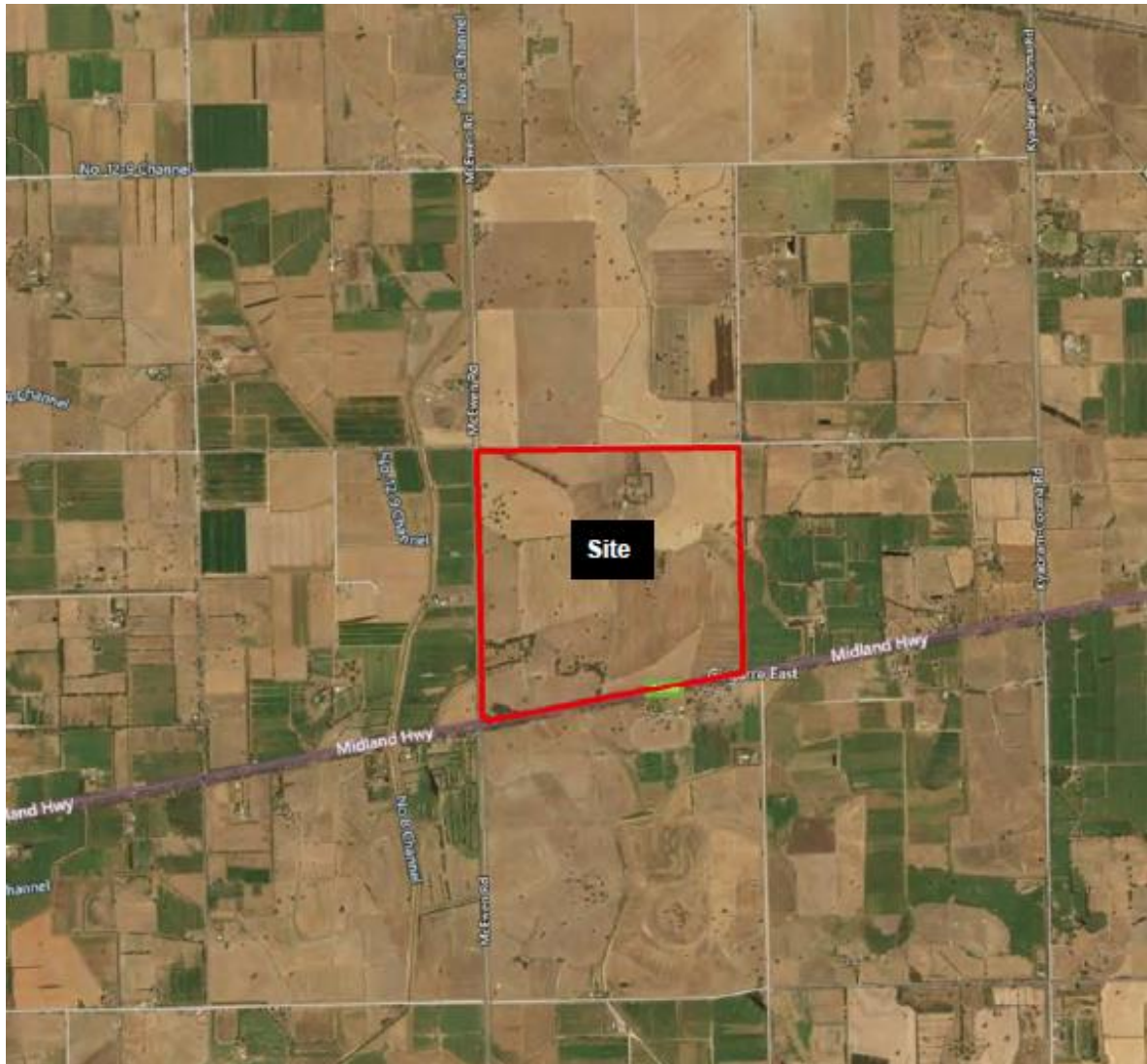
Figure 2-1 Title Details



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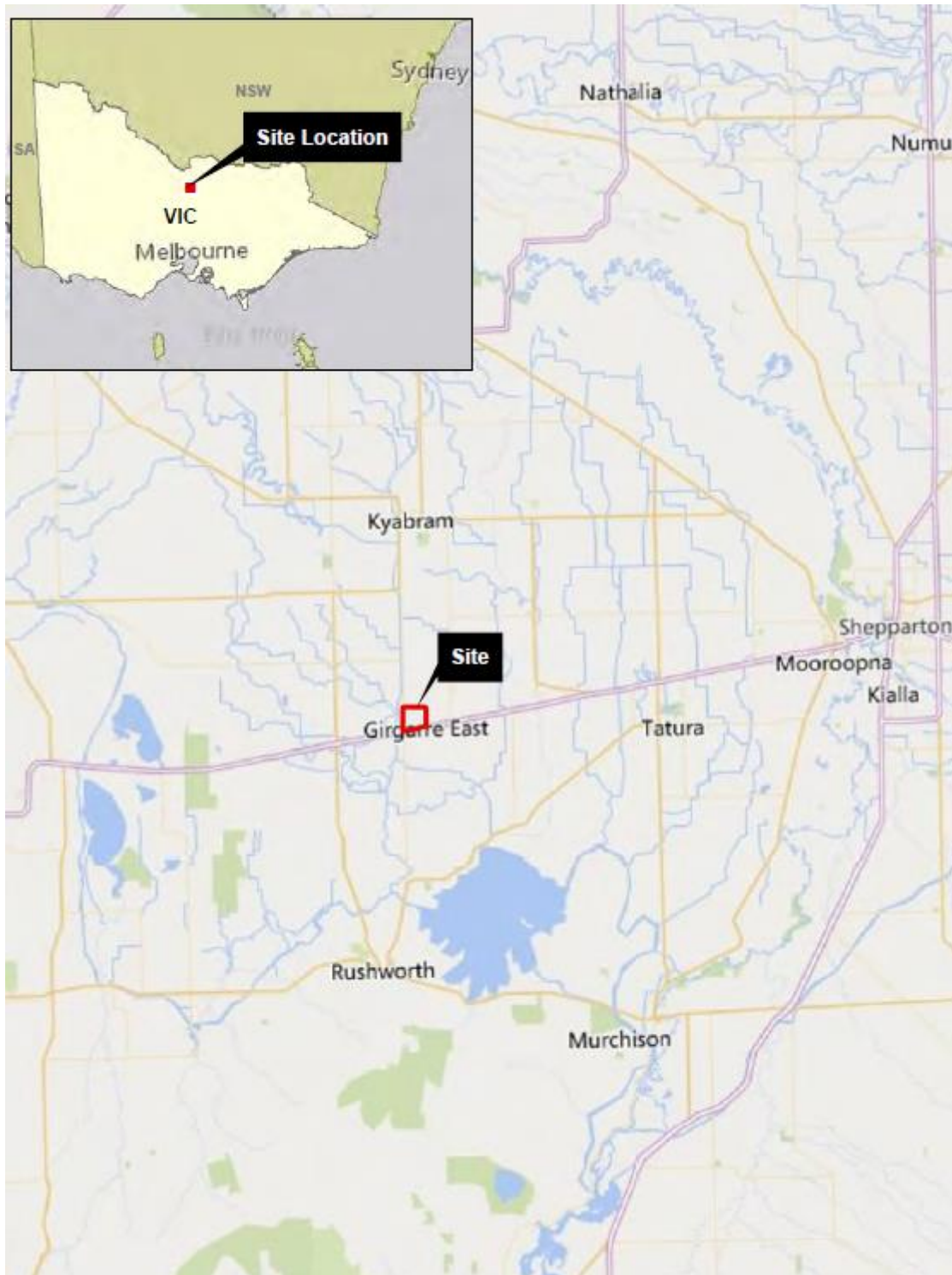
Figure 2-2 Subject Site



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Figure 2-3 Subject Site and Surrounds



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Figure 2-4 Site Photographs



Looking east to southeast toward the Midland Highway from the western part of the site



Looking north to northeast toward McCague Road from the eastern part of the site

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Looking north to northwest toward McCague Road from the centre of the site



Looking west to north-west toward McCague Road from the eastern section of the site

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2.2 Area

The Midland Highway is located to the south boundary of the site and the site is bound by Poole Road, McEwan Road, and McCague Road.

The Powercor Stanhope to Shepparton 66kV Sub-Transmission Line also runs along Midland Highway.

The broader area is generally used for agricultural purposes with associated dwellings and infrastructure, with the notable exceptions being;

- Cooma Recreation Reserve and Cooma Evangelical Memorial Uniting Church 8km north-east;
- Stanhope township approximately 8km west;
- Girgarre township approximately 12km north-west; and
- Merrigum township approximately 17km north-east.

2.3 Native Vegetation

The subject site is located within the Victorian Riverina bioregion of Victoria. The study area is largely cleared of native vegetation and dominated by pastures and exotic grasses.

The native vegetation and habitat of the site has been a key driver of the proposed layout, and the layout of the solar farm has taken care to retain as many of the larger trees and native vegetation as possible. Refer Section 3.3 of this report for additional detail.

2.4 Waterway

There is a mapped wetland in the south-west of the study area which is a low-lying area planted with Australian Native Eucalypts.

The waterbodies that run through the site include small artificial bodies such as irrigation channels and dams.

2.5 Heritage

There is no heritage overlay or historic heritage mapped on the site or within the broader area.

As shown in Figure 2-5, the subject site is located an area of Aboriginal Cultural Heritage Sensitivity and the activity area contains a prior waterway. Furthermore, the proposed activity is considered a high impact activity and therefore a mandatory CHMP is required.

A mandatory Cultural Heritage Management Plan is currently being prepared for the project.

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Figure 2-5 Area of Cultural Heritage Sensitivity



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3. PROPOSAL

3.1 Project Description

The 75 MW grid connected solar farm is expected to generate enough power to supply 37,400 typical Victorian homes. The battery energy storage system (“BESS”) will be a 25 MW system intended to provide grid stability services to the electricity network, which will further enable increased penetration of green, renewable energy into the National Electricity Market. The Viewbank Solar Farm will help reduce greenhouse gas emissions by up to 132,000 tonnes of CO₂ each year and will be connected to PowerCor’s existing 66kV sub transmission line, which is located to the south of the site, along the Midland Highway.

It should be noted that Solar PV panels are increasing in efficiency and hence watt-ratings. Therefore, the final generating capacity of the as-built solar farm within the development footprint (ie. its nameplate rating) will not be known until after the commencement of construction. This will not alter the proposed development footprint. The PV panels will be arranged in rows spaced several metres apart on a single axis-tracking system that will change the orientation of the panels throughout the day to follow the sun. The solar PV panels will be up to 4.2m tall when tilted at their maximum tilt angle. It is proposed that Viewbank Solar Farm will include:

- Separate arrays of PV modules including inverters and an underground cable network, with the following setbacks:
 - 3.5m – 7.5m setbacks between the solar panel rows;
 - A 30m perimeter setback around the subject site;
 - Minimum of 10m setback from areas of Aboriginal cultural sensitivity; and
 - Minimum of 10m setback from wetland area.
- Utility installations including a 25 MW Battery Energy Storage System (BESS) and powerlines to connect the facility to the grid (the powerline will be located on the subject site and within the Midland Highway road reserve);
- An on-site dedicated solar farm substation to connect the Project to PowerCor’s sub transmission line. The proposed height of the substation is 8m;
- Native Vegetation Planting along sections of Midland Highway and Poole Road (as per Department of Transport requirements). Indicative planting has been shown in line with existing planting on Midland Highway and has been located in areas where the largest impact is considered to occur. It is requested that a landscaping plan be requested as part of permit conditions;
- Site Office (to include firefighting supplies) and associated staff car parking; and
- Site access provided from Poole Road (off Midland Highway), with a secondary or emergency access off McEwen Road and internal access tracks.

PV modules will be fixed to and supported by a ground-mounted framing structure, aligned in rows oriented in a north-south direction. Single axis tracking technology will be used for the project so that the panels can change their orientation throughout the day to follow the sun and maximise the energy captured. The proposed panel height is up to 4.2m.

It should be noted that Solar PV panels are increasing in efficiency and hence watt-ratings every year, which means that the final generating capacity of the as-built solar farm within the development footprint (ie. its nameplate rating) will not be known until after the commencement of construction.

This will not alter the proposed development footprint. The PV panels will be arranged in rows spaced several metres apart, on a single axis-tracking system. It is noted that the final design detail has not been finalised and the use of a single axis tracking system with a single row of PV panels (1P) or a double row of PV panels (‘2P’) is yet to be determined, therefore it is important that the assessment

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is based on the 'worst case scenario' as relevant to each aspect. Ultimately, the maximum panel height of 4.2m is sought for approval.

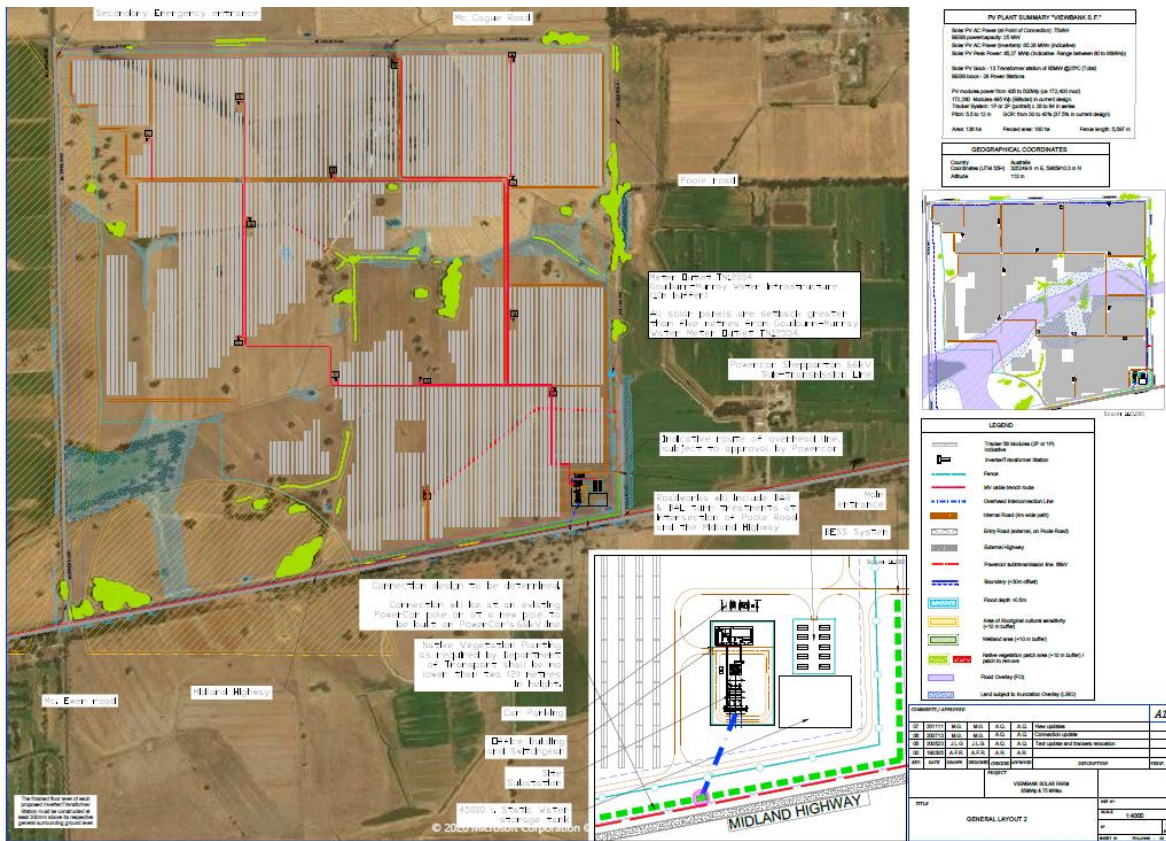
In terms of vegetation to be removed, 0.237 ha of the lowest quality native vegetation patches are to be removed (out of a total of 4.79 ha, or 6% of the native vegetation patches within the study area, and eight Scattered Trees (one small and seven large), out of the 115 Scattered Trees (or a loss of 7%). For the purposes of calculating the native vegetation offsets, the proposed seeks an impact of 0.769 ha.

It is proposed that sheep will be able to graze around and between the panels, providing useful management of groundcover, and continuing the agricultural use of the land.

The construction period of the project is expected to be up to 14 months. During construction, a site office compound and temporary laydown areas will be established.

The lifespan of the project is estimated to be 30 years. At the end of its useful life, the solar farm can be decommissioned and traditional agricultural use will resume back on site (noting the planning controls relevant at the time of decommissioning will be applicable).

Figure 3-1 Site Layout Plan



3.2 Infrastructure Connections and Licences

In terms of making best use of existing infrastructure, the subject site intersects PowerCor's 66kV distribution line to the south. It is proposed to connect into the distribution line via an on-site substation. This removes the need to establish further distribution lines in this area.

An overhead line (within the Midland Highway road reserve) will need to be constructed to connect the on-site substation to the existing distribution line. The connection design is to be determined

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pending future agreements. The options are to connect to an existing PowerCor pole or at a new pole to be built on PowerCor's 66kV line. The overhead line will consist of approximately 150m distance with poles that are the same height as the existing powerline. The solar farm substation height is expected to be in the range of 6-8 metres, subject to PowerCor's confirmation. It is expected that the highest points of the substation will be approximately the same height as the existing PowerCor poles on Midland Highway.

3.3 Vegetation Removal

The Biodiversity Assessment prepared by Ecolink Consulting surveyed the native vegetation onsite.

Viewbank Solar Farm has undertaken extensive design work to support the retention of existing native vegetation on the site. The current development design has been developed to minimise impacts to both the patches of native vegetation and the scattered trees within the study area, whilst still meeting functional requirements of the proposed Solar Farm, including a road access track, transmission connection, battery storage facility and solar arrays. The proposed development plan footprint avoids areas determined to be of the highest ecological value, which are located in the 'woodland' areas of the study area.

The south-west portion of the site includes a mapped wetland, which has been planted with Australian Native Eucalypts. The wetland is artificial, is of moderate to high quality, and is likely to provide habitat to invertebrates, frogs, reptiles, birds and small native fish. The planted area is also likely to provide foraging and nesting resources to a range of birds and arboreal mammals. The proposed layout plan fully avoids and protects this area.

The removal of native vegetation forms a key assessment of the planning application. Seven large Scattered Trees and one small Scattered Tree are proposed to be removed to enable construction of the project. This equates to an impact of 7% of the total Scattered Trees on the site. The removal of trees will be managed according to the *Victorian Guidelines for the Removal, Destruction or Lopping of Native Vegetation*. In addition to the removal of scattered trees, 0.273 ha of native vegetation patches will be removed. These patches of low quality, noting the high quality patches will be protected, and that the proposed impact to the native vegetation patches comprises only 6% of the total native vegetation patches on the site.

Management measures for the protection of native vegetation during the construction, operation and decommissioning stages of the solar farm are welcomed to be included in a Construction Management Plan required by the planning approval. Guidance for the required protection areas is included within the Biodiversity Report and the proposed layout incorporates the required tree protection zones for the retained trees and vegetation patches.

3.4 Traffic and Access

A series of gravel access roads will provide access within the site and include access from Poole Road (main access) with additional access points from McEwen Road (secondary/emergency access). It is expected that all external public roads will be able to cater for movements generated by the proposed development.

Please refer to the Traffic Assessment prepared by Impact Traffic Engineering in Appendix E.

3.5 Construction Process

Viewbank Solar Farm hopes to commence construction in 2021 and to commence operations in 2022. It is expected that a Construction Management Plan will be required to be prepared and submitted to the responsible authority for approval as a condition of the planning permit.

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3.6 Stakeholder Engagement and Community Benefits

3.6.1.1 Stakeholder Engagement

A stakeholder engagement plan has been prepared for the project (see Appendix G) that outlines the project's commitment to engage key stakeholders and community members throughout the development and construction phase. Letters were sent to neighbours on 11 June 2020 informing them of the proposal and inviting them to contact FRV with any questions about the development. No inquiries have been received at the time of writing. Initial discussions with several other key stakeholder groups such as City of Greater Shepparton, Goulburn Broken CMA, GMW and DELWP have already occurred as part of the pre-application process. Formal stakeholder engagement will continuously be implemented as the permit application progresses. A website has also been published.

3.6.1.2 Employment, Supplier and Business and Community Benefits

A range of employment and supplier opportunities will be generated during construction. Construction is expected to take approximately 14 months and require a workforce of 150 people. Where possible, FRV (through its construction contractor) will maximise the opportunities provided to local businesses and contractors. Non-local staff are likely to reside in the Shepparton region. During this stage of the project, accommodation, meals and support services will be required to support construction activities, which will stimulate business locally. Additionally, there will be opportunities for local companies to supply raw materials and construction plant.

After the facility has been constructed and is operational there will be a requirement for support services as part of the maintenance regime of the solar farm. This includes preventative maintenance for the solar farm equipment, washing solar panels, and land management (eg weed spraying). It is expected that 4-5 full-time staff would be required during operation of the solar farm.

FRV are committed to supporting the local communities where their projects are located. No specific plan for community benefit schemes are currently proposed, this will be prepared as part of ongoing community engagement during the course of the planning application.

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4. RELEVANT VICTORIAN PLANNING PROVISIONS

The *Planning and Environment Act 1987* (the Act) provides the legal framework for Victoria's planning system. The purpose of the Act is to establish a framework for planning the use, development and protection of land in Victoria. The Act enables the establishment of the Victorian Planning Provisions and Planning Schemes.

The planning controls, policies and provisions of the Greater Shepparton Planning Scheme affect the subject site.

4.1 State and Regional Planning Policy Framework

The relevant sections of the State Planning Policy Framework include:

- Clause 12 Environmental and Landscape Values
 - Clause 12.01 Biodiversity
 - Clause 12.01-1 Protection of Biodiversity
 - Clause 12.01-2 Native Vegetation Management
 - Clause 12.03 Water Bodies and Wetlands
 - Clause 12.05-2 Landscapes
- Clause 13 Environmental Risks and Amenity
 - Clause 13.02-1 Bushfire Planning
- Clause 14 Natural Resource Management
 - Clause 14.01-1 Protection of Agricultural Land
 - Clause 14.02-1S Catchment Planning and Management
 - Clause 14.02-3S Protection of declared irrigation districts
- Clause 17 Economic Development
 - Clause 17.01R Diversified Economy – Hume
- Clause 19 Infrastructure
 - 19.01-1S Energy Supply
 - 19.01-2R – Renewable Energy - Hume

4.2 Local Planning Policy Framework

The relevant sections of the Local Planning Policy Framework include:

- Clause 21.03 Vision Sustainability Principles and Strategic Directions:
 - The Council Plan contains the following Vision:
 - *Greater Shepparton, As the Food Bowl of Australia, A Sustainable Innovative and Diverse Community. Greater Future.*
 - In support of its Vision, Council has adopted the following themes and principles:
 - Settlement, Housing & Urban Design
 - *Commitment to growth within a consolidated and sustainable development framework*

- Community Life

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- *Enhance social connectedness, physical and mental health and wellbeing, education and participatory opportunities in order to improve liveability and provide a greater range of community services.*
- Environment
 - *Conservation and enhancement of significant natural environments and cultural heritage.*
 - Economic Development
 - *Promote economic growth, business development and diversification, with a focus on strengthening the agricultural industry.*
 - Infrastructure
 - *The provision and re-structure of urban and rural infrastructure to enhance the performance of the municipality and facilitate growth.*
- Clause 21.05-1 Natural Environment and Biodiversity
 - Objectives include:
 - *To maintain and enhance biodiversity of native flora and fauna communities;*
 - *To protect and manage the natural resources of water, air and land;*
 - *To identify natural landscape features which are to be protected and managed; and*
 - *To ensure planning for residential and rural residential growth provides for biodiversity protection and enhancement measures.*
- Clause 21.05-2 Floodplain and Drainage Management
 - Objectives include:
 - *To recognise the constraints of the floodplain on the use and development of land.*
- Clause 21.05-3 Best Practice Land Management
 - Objectives include:
 - *To provide a supply of high quality water for urban and agricultural use;*
 - *To minimise the degree of salinity through an integrated regional surface water management program;*
 - *To reduce greenhouse gas emissions;*
 - *To direct development according to identified land capability and suitability; and*
 - *To recognise the threat posed to surface water and groundwater quality by non-reticulated domestic wastewater systems.*
- Clause 21.05-4 Cultural Heritage
 - Objectives include:
 - *To ensure that places of cultural heritage significance are conserved or restored;*
 - *To ensure that development does not adversely affect places of cultural heritage significance;*
 - *To conserve and enhance significant views and settings in any heritage precinct; and*
 - *To ensure that archaeological remains are not inadvertently damaged or destroyed.*
- Clause 21.06-1 Agriculture
 - Objectives include:
 - *To ensure that agriculture is and remains the major economic driver in the region;*
 - *To facilitate growth of existing farm businesses;*

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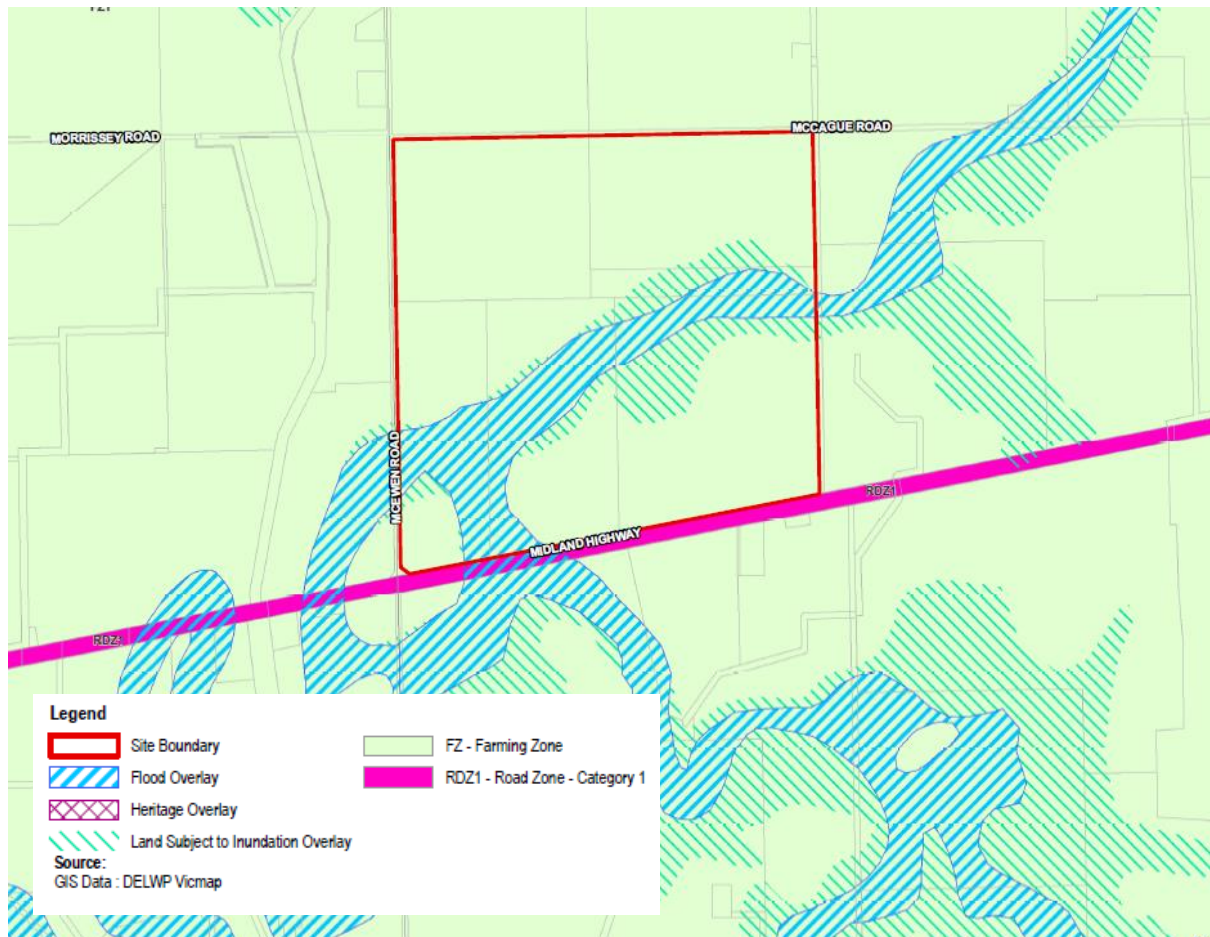
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- To facilitate growth of new agricultural investment; and
- To provide for small scale, specialized agriculture.

4.3 Planning Controls

The Farming Zone, the Floodway Overlay and Land Subject to Inundation Overlay (see Figure 4-1) affect the site.

Figure 4-1 Planning Zones and Overlays Map



4.3.1 Farming Zone

The site is located within the Farming Zone pursuant to Clause 35.07 of the Planning Scheme.

The purpose of this zone is:

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

Under the provisions of Clause 35.07-1, a planning permit is required for the use of the site as a renewable energy facility (solar farm), a utility installation (BESS and powerline to connect substation

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to the grid) and a minor utility installation (sub station) and ancillary uses. The use must meet the requirements of Clause 53.13.

Pursuant to **Clause 35.07-4**, a permit is required for building and works for Section 2 (permit required) uses.

4.3.2 Road Zone

The purpose of this zone is:

- To implement the Municipal Planning Strategy and the Planning Policy Framework;
- To identify significant existing roads;
- To identify land which has been acquired for a significant proposed road.

Under the provisions of **Clause 36.04-2**, a permit is required to construct a building or construct or carry out works for a use in Section 2 of Clause 36.04-1.

4.4 Overlays

4.4.1 Land Subject to Inundation Overlay

The purpose of this overlay is:

- To implement the Municipal Planning Strategy and the Planning Policy Framework;
- To identify land in a flood storage or flood fringe area affected by the 1 in 100-year flood or any other area determined by the floodplain management authority;
- To ensure that development maintains the free passage and temporary storage of floodwaters, minimises flood damage, is compatible with the flood hazard and local drainage conditions and will not cause any significant rise in flood level or flow velocity;
- To reflect any declaration under Division 4 of Part 10 of the Water Act, 1989 where a declaration has been made;
- To protect water quality in accordance with the provisions of relevant State Environment Protection Policies, particularly in accordance with Clauses 33 and 35 of the State Environment Protection Policy (Waters of Victoria); and
- To ensure that development maintains or improves river and wetland health, waterway protection and flood plain health.

Under the provisions of **Clause 44.04-2**, a permit is required to construct a building or to construct or carry works.

4.4.2 Floodway Overlay

The purpose of this overlay is:

- To implement the Municipal Planning Strategy and the Planning Policy Framework;
- To identify waterways, major floodplains, drainage depressions and high hazard areas which have the greatest risk and frequency of being affected by flooding;
- To ensure that any development maintains the free passage and temporary storage of floodwater, minimises flood damage and is compatible with flood hazard, local drainage conditions and the minimisation of soil erosion, sedimentation and silting;
- To reflect any declarations under Division 4 of Part 10 of the Water Act, 1989 if a declaration has been made;
- To protect water quality and waterways as natural resources in accordance with the provisions of relevant State Environment Protection Policies, and particularly in accordance with Clauses 33 and 35 of the State Environment Protection Policy (Waters of Victoria); and

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- *To ensure that development maintains or improves river and wetland health, waterway protection and flood plain health.*

Under the provisions of **Clause 44.03-2**, a permit is required to construct a building or to construct or carry our works.

4.5 Particular Provisions

The following provisions of the Planning Scheme are applicable to the project.

4.5.1 Clause 52.17 – Native Vegetation

The purpose of this provision is to ensure that impacts on native vegetation do not result in a net loss to biodiversity and do not significantly degrade the land and water. This provision necessitates meeting the requirements of the *Guidelines*, an incorporated document to the Planning Scheme discussed in Ecolink's biodiversity assessment.

Pursuant to this clause, a permit is required to remove, destroy or lop native vegetation, including dead native vegetation. Exclusions are listed in Clause 52.17-7.

0.237 ha of the lowest quality native vegetation patches are proposed to be removed (out of a total of 4.79 ha, or 6% of the native vegetation patches within the study area, and eight Scattered Trees (one small and seven large), out of the 115 Scattered Trees (or a loss of 7%) are proposed to be removed.

For the purposes of calculating the native vegetation offsets, the proposed seeks an impact of 0.769 ha.

4.5.2 Land Adjacent to a Road Zone, category 1

The purpose of this provision is to ensure appropriate access to identified roads and ensure that appropriate subdivision of land adjacent to identified roads.

The proposal does not include an additional creation or alteration of a road in a Road Zone, Category 1.

4.5.3 Clause 53.13 – Renewable Energy Facility (Other Than Wind Energy Facility)

The purpose of this clause is:

'To facilitate the establishment and expansion of renewable energy facilities, in appropriate locations, with minimal impact on the amenity of the area.'

This Clause applies to an application under any provision of the Planning Scheme to use or develop land for a renewable energy facility (other than a wind energy facility). The Clause provides an outline of Application Requirements and Decision Guidelines.

4.5.4 Referral Provisions

The table below outlines the referral requirements for the project under the Greater Shepparton Planning Scheme.

Table 1 Referral Provisions

Control	Kind of Application	Referral Authority	Type of Authority
Clause 66.02-2 Native Vegetation	To remove, destroy or lop native vegetation in the Detailed Assessment Pathway as defined in the Guidelines for the removal, destruction or lopping of native vegetation	Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the	Recommending referral authority

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	(Department of Environment, Land, Water and Planning, 2017).	Conservation, Forests and Lands Act 1987)	
Clause 66.02-12 Declared irrigation districts	An application to use or develop land for a renewable energy facility within an irrigated district declared under part 6A of the <i>Water Act 1989</i> .	Secretary to the Department administering the <i>Water Act 1989</i>	Recommending referral authority
Clause 44.03-6 Floodway Overlay	An application under the overlay outside the waterway management district of Melbourne Water Corporation.	Relevant floodplain management authority	Recommending referral authority
Clause 44.04-7 Land Subject to Inundation Overlay	An application under the overlay outside the waterway management district of Melbourne Water Corporation	Relevant floodplain management authority	Recommending referral authority
Schedule to Clause 66.04 - Clause 5 to the Incorporated Document at Clause 81 <i>Earthworks Controls in the Shire of Campaspe, City of Greater Shepparton and the Moira Shire August 2015 Incorporated Document</i>	When the application involves 'works' that adjoin GMW assets When the application involves 'works' that potentially impact on GMW works or interests. (such as pumping to channels, subways under GMW channels, works within 30 metres of GMW assets etc.) When the proposed 'works' have complex drainage impacts	Goulburn – Murray Rural Water Corporation (GMW)	Determining referral authority
Schedule to Clause 66.04 - Clause 5 to the Incorporated Document at Clause 81 <i>Earthworks Controls in the Shire of Campaspe, City of Greater Shepparton and the Moira Shire August 2015 Incorporated Document</i>	When the application involves 'works' that adjoin a declared road under the management of the Roads Corporation.	Roads Corporation	Determining referral authority
Schedule to Clause 66.04 - Clause 5 to the Incorporated Document at Clause 81 <i>Earthworks Controls in the Shire of Campaspe, City of Greater Shepparton and the Moira Shire August 2015 Incorporated Document</i>	An application for 'works'. An application that may	Relevant floodplain management authority	Recommending referral authority

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Incorporated Document at Clause 81 <i>Earthworks Controls in the Shire of Campaspe, City of Greater Shepparton and the Moira Shire August 2015 Incorporated Document</i>	impact on or within 30 metres of a waterway.		
Schedule to Clause 66.04 - Clause 5 to the Incorporated Document at Clause 81 <i>Earthworks Controls in the Shire of Campaspe, City of Greater Shepparton and the Moira Shire August 2015 Incorporated Document</i>	An application for works	Secretary to the Department of Environment, Land, Water and Planning	Determining referral authority

4.6 Other Relevant Documents

4.6.1 *Solar Energy Facilities Design and Development Guidelines (Department of Environment, Land, Water and Planning, 2019)*

These guidelines were developed to provide applicants, the community, regulators and responsible authority information around the assessment and development process for large-scale solar energy facilities in Victoria. They provide proponents guidance around improving their proposal to minimise impacts on local communities and address the appropriate legislation. A detailed response to this is provided in Section 5.2 of this report.

4.6.2 *The Hume Regional Growth Plan*

The Hume Regional Growth Plan (HRGP) provides a regional approach and understanding of land use planning in the Hume Region, which includes Greater Shepparton.

The HRGP establishes a vision, principles and strategies for long-term prosperity and sustainable growth.

The HRGP seeks to protect the environmental and heritage assets, including the region's significant cultural landscapes and its areas of high biodiversity values, including threatened species. It also seeks to protect valuable agricultural land (noting the region's high reliance on agriculture and manufacturing) while supporting diversification of the economy.

The HRGP identifies the subject site and western region as being of high quality agricultural land.

The areas of High Quality Agricultural Land are identified through soil quality mapping. This is considered in site specific detail within the Agricultural Assessment included within Appendix F and within Section 5.2 of this report.

4.6.3 Goulburn Broken Regional Catchment Strategy

The Goulburn Broken Regional Catchment Strategy (RCS) provides the integrated framework or 'blueprint' for management of land, water and biodiversity resources.

The site is located within the Agricultural Floodplains area, which encompasses the Shepparton Irrigation Region (SIR) and northern parts of the Catchment to the Murray River. The following points provide the focus for the Agricultural Floodplains area. This includes:

- *Connect native vegetation on private land to the Goulburn and Broken Rivers, Barmah Forest and Broken Creek;*
- *Keep shallow watertables below plant root zones and coordinate disposal of saline water;*
- *Protect the unique character of Barmah Forest and key rivers, such as the Lower Goulburn River and Broken Creek and wetlands through delivery of environmental water and land management;*
- *Integrate efficient water use with other environmental features into farm design;*
- *Identify new ways to farm sustainably in variable climatic conditions;*
- *Influence water policy to protect and secure water for farmers and the environment through community leadership.*

4.6.4 Greater Shepparton Floodplain Development Plan (Precinct of Mosquito Depression)

This floodplain development applies to Mosquito Depression and tributary floodplains and this area is affected by the Urban Floodway Zone, Floodway Overlay and Land Subject to Inundation Overlay pursuant to the Greater Shepparton Planning Scheme. The local floodplain development plan provides a performance based approach for decision making that reflects local issues and best practice, including flood risk assessment, in floodplain management.

The Mosquito Depression has a long history of flooding, with major floods occurring in 1950, 1955, 1956, 1974 and 1993. Tatura and Merrigum are at substantial risk of flooding. Based on flood mapping completed, major flooding is generally confined to the depression systems in the upper catchment areas, as well as along drainage lines and flood storage areas. To minimise overland flooding from the depression systems during large flood, buildings and works need to be located away from drainage lines and flow paths. Flood impacts for FO areas are generally greater than LSIO areas, as the velocities, depths and frequency of flooding are generally greater.

The development plan does not include any specific guidance for renewable energy facilities. However, there is guidance on particular development requirements for industrial areas. Whilst not specific to renewable energy facilities, the proposal has been assessed against these requirements.

Section 8.2 of the Development Plan states that industrial buildings within an LSIO must have a floor level set at least 300mm above the 100 year ARI flood level (nominated flood protection level).

Furthermore, Section 9.2 states that for developments within FO or LISO:

- The construction of any new non habitable building must be sited on the highest available ground unless the applicant can demonstrate to the satisfaction of the responsible authority and floodplain management authority that an alternative site is more suitable.
- Any non-habitable building must be aligned so that their longitudinal axis is parallel to the predicted direction of flood flow.

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- Any earthworks do not obstruct natural flow paths or drainage lines on land located within the overlay.
- Any earthen land fill at the site of a new building or a building extension should be no more than 2 metres from the building footprint.
- Any works that are designed to protect the immediate surrounds of existing habitable dwellings, where the floor level is below the 100-year ARI flood level, and do not enclose an area of more than 1,000m² including the footprint of works.

Section 5.8 of this report includes a response to flooding concerns.

4.6.5 *Clause 9 of the Incorporated Document – Earthworks Controls in the Shire of Campaspe City of Greater Shepparton and the Moira Shire August 2015*

The objectives of this document includes:

- To manage and provide for long term land sustainability, improved salinity, and a reduction in nutrient levels leaving a property.
- To manage the drainage system for the region in a way that allows the reasonable flow of water through the region.
- To provide a consistent approach to earthworks and drainage management in the catchment regardless of municipal boundaries or whether land is within the irrigation region.
- To allow floodplains to function so as to provide flood conveyance and flood storage.

The Incorporated Document relates to a permit for any works under the Floodway Overlay (at Clause 44.03-1) and the Land Subject to Inundation overlay (at Clause 44.04-1).

An application for earthworks (or works) must be referred under Section 55 of the Planning and Environment Act 1987 to the following authorities and in the following circumstances as listed in Clause 66.04 of the Planning Scheme:

Relevant Floodplain Management Authority

- When the application involves works on land that is liable to flooding as identified in the Land Subject to Inundation and Floodway Overlays.
- When the application involves works that may impact on or within 30m of a waterway.
- *Goulburn – Murray Rural Water Corporation (GMW)* When the application involves ‘works’ that adjoin GMW assets.
- When the application involves ‘works’ that potentially impact on GMW works or interests.

Road Corporation

- When the application involves ‘works’ that adjoin a declared road under the management of the Roads Corporation

Before deciding on a permit application, and in addition to the decision guidelines in Clause 65, the responsible authority must consider, as appropriate:

- The SPPF and LPPF, the MSS and local planning policies.
- The objectives of the relevant land and water management plan.
- The objectives and provisions of the Water Act.
- The need to establish and maintain reasonable flow of water through the area.

The written advice of the relevant authorities that it is satisfied that the works proposed are reasonable and will not adversely alter or will improve drainage in the area.

It is noted that this document and its references mainly refer to the impacts of farming on reasonable flow of water through the area. The proposal does not include any farming works, however, the proposed solar farm will include works and these works will be assessed against the provisions of the Water Act and need to establish and maintain reasonable flow of water through the area. Section 5.8 of this report includes a response to flooding concerns.

4.6.6 Goulburn Broken Catchment Management Strategy

The site is located within the Productive Plains sub-catchment social-ecological systems (SES) which is identified as the foothills and floodplains towards the north of the Catchment.

The area includes:

- Habitat provided by vegetation along waterways, roadsides, ranges and spring soak wetlands
- Dryland farming including cattle, sheep, cropping and viticulture and many farms remain in same families for generations with average farming populations ageing
- Rivers and creeks in moderate condition and wetlands in moderate to good condition.
- Landcare and conservation management networks establish sustainable farming practices and protect threatened species
- More habitat loss, ageing farming populations and declining social connection are threats to biodiversity and farming futures

Major threats to biodiversity in this SES include continued fragmentation and loss of species diversity resulting in a shift from the fragmented (10-30 per cent extent) to a relictual ecosystem (relictual is defined as less than 10 per cent native vegetation cover).

Agriculture is a dominant land use in the SES, however land use varies in relation to soil type and climatic condition as a result of erosion, organic matter decline, soil acidification and contamination, compaction, salinization and biodiversity decline which are all a threat to soil in the SES.

The document specifies that the productive Plains SES's relative stability presents an opportunity to address incremental threats and to develop general resilience in advance of an uncertain future. Management measures relevant to the project include:

- Work with landholders to protect and improve biodiversity on private land and build understanding of its contribution to sustainable and profitable farming
- Create awareness and acceptance of sustainable management practices to improve land and soil condition

5. PLANNING ASSESSMENT

Policies of the State Planning Policy Framework have been assessed above below and are outlined as topics relevant to the local policies:

5.1 Renewable Energy, Employment and Social Benefits

5.1.1 Renewable Energy Production and Sustainable Development

Victoria's Renewable Energy Action Plan recognises that renewable energy is already the cheapest and cleanest new power generation source, and that by acting now on renewable energy, we give ourselves the best opportunity to capitalise on the transformation and transition, reducing the risk of higher late adoption costs. The Planning Policy Framework recognises this broader aim, most specifically within Clause 19.01-2 of the Planning Scheme, which establishes that the development of well-sited renewable energy facilities is to be facilitated in Victoria.

The Project would generate clean and renewable energy, enough to power approximately 37,400 average Victorian homes and avoid the production of over 132,000 tonnes of CO₂ per annum, on

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average over the project's expected 30-year lifetime. There is existing transmission infrastructure to the south of the subject site that facilitates connection to the grid, which the project will make excellent use of existing infrastructure.

By producing renewable energy and reducing greenhouse gas emissions, the proposal is consistent with Clause 15.02-1S, which seeks to encourage land use and development, which minimises greenhouse gas emissions. Further, the Project would contribute positively to the economic diversity and development within the municipality and would generate clean and renewable energy for the benefit of all Victorians (Clause 15.02-1).

The site is well located for a solar facility in terms of its proximity to existing infrastructure, as it makes use of the existing electricity network, minimising the footprint of the required high voltage electrical infrastructure that would be needed to connect the solar farm to the grid. Subsequently, this avoids the need to impact neighbouring land and remove vegetation for transmission line easements, and deriving further benefit from the existing infrastructure, as sought under Clause 19 and Clause 21.05. Avoidance of native vegetation and avoiding areas of flood risk has been a key driver of the layout and protection of adjoining land uses has been recognised through adequate setbacks. Impacts will be further mitigated through the implementation of appropriate construction and operational management requirements.

5.1.2 Economic Benefit

As mentioned in Section 3.6 of this report, the project will create jobs and supplier opportunities during construction and operation, which can be sourced locally. Construction is expected to last approximately 14 months and will require a workforce of approximately 150 people. During construction, accommodation, meals and support services will be required to support construction activities, which will create indirect business opportunities in the local area. These various employment, supplier and business opportunities will assist in achieving the objectives of Clause 35.07-1, Clause 17 and local and regional policy objectives for a diversified local economy.

The operation of the site will create four to five permanent jobs, further supporting local employment opportunities.

The opportunity to support diversification of the economy, with specific reference to solar generation opportunities, is also recognised in the Hume Regional Growth Plan.

5.2 Renewable Energy Facility Planning Particular Provision

Clause 53.13 of the Planning Schemes provides specific guidance on planning applications for renewable energy facilities. An assessment against the specific provision of Clause 53.13 is detailed in Table 2 below.

Table 2: Clause 53.13 Decision Guidelines

Decision Guideline	Response
The effect of the proposal on the surrounding area in terms of noise, glint, light spill, vibration, smell and electromagnetic interference.	The layout plan achieves a minimum setback of 30m and is responsive to flood risks, the need to protect as much native vegetation on the site as possible, bushfire management and amenity concerns (glint and glare, noise and the like). The proposal will further minimise its impact on the surrounding area through measures detailed within the project's Construction and Operations Management Plans (expected to be a requirement of any permit issued). Refer to Section 5.3 of this report for additional detail.

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Decision Guideline	Response
The impact of the proposal on significant views, including visual corridors and sightlines.	There are no significant views relevant to this site. Localised views have also been considered within the Landscape Visual Impact and Glare Assessment (Appendix J). Refer to Section 5.3 of this report.
The impact of the proposal on strategically important agricultural land, particularly within declared irrigation districts.	Protection of strategically important agricultural land has been fully considered in the proposal. Refer to Section 5.3 of this report.
The impact of the proposal on the natural environment and natural systems.	Environmental management and protection of natural environment is a core driver of the design of the site layout. Refer to Section 5.9 of this report.
The impact of the proposal on the road network.	Some traffic management measurements may be required. Refer to Section 5.6 of this report.
<i>Solar Energy Facilities Design and Development Guideline</i> (Department of Environment, Land, Water and Planning, August 2019).	In preparing this application regard has been had to the guidelines and this report and associated sub consultant reports address all relevant requirements.

The proposal complies with the provisions of Clause 53.13.

5.3 Impact on Agricultural Land and Irrigated Land

5.3.1 Irrigated Land

The site is currently operating as a mixed farming enterprise consisting of grazing (prime lambs) and cropping.

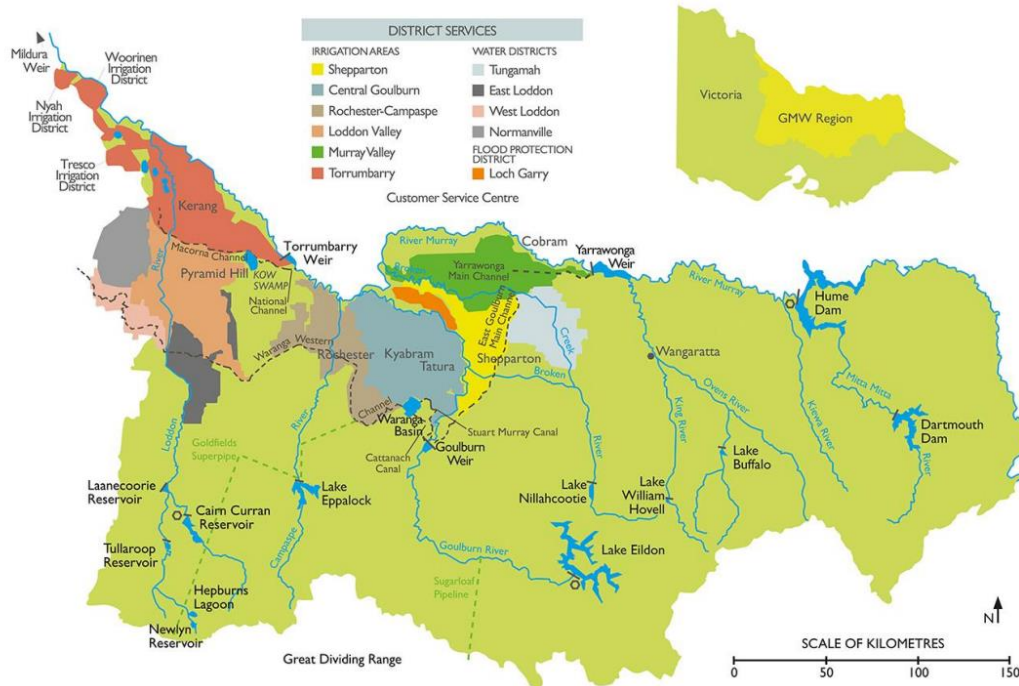
Clause 35.07 (Farming Zone) seeks to, amongst other things, provide for and conserve agricultural land, encourage the retention of employment and population to support rural communities and encourage use and development of land based on comprehensive and sustainable land management practices and infrastructure provision.

The site is located within the Goulburn Murray Irrigation District (see Figure 3) and has access to the irrigation delivery system via one service point. An Agricultural Land Assessment was prepared by RMCG (Appendix F) to assess the implications of this.

Figure 5-1 Goulburn Murray Water's Irrigation Districts

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The site consists of approximately 217ha and less than half (98ha) of that land is irrigated. Page 9 of the Agricultural Land Assessment shows the areas of irrigated, dryland and non-productive land on the site.

Figure 5-2 Site Area Breakdown



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The farm is located in the GMID and is connected to a modernised backbone channel which is located outside of the property boundary. The site contains a single irrigation service point that connects the property to the irrigation network. The site also contains a number of private drainage channels; however, these do not connect through to other properties. The irrigation infrastructure on the property is highly variable and ranges from poor to moderate. Figure 6 shows the location of the channel and service point.

Figure 5-3 GMID Irrigation Connection Point



Whilst the site has access to the irrigation delivery system, there are also physical and practical considerations that limit the irrigation potential of the site.

The Agricultural Land Assessment at Appendix F also outlines water availability issues with GMID. The report refers to a report by Tim Cummings and Associates (2016) which highlighted the change in water ownership which reflects the changes that have been experienced in the region. This report highlighted the change in water ownership by irrigators within the GMID had fallen by 40% since June 2001. Although water entitlement ownership does not reflect water usage (as irrigators can purchase and trade-in allocation water), the statistic certainly confirms that the amount of water allocated to irrigation property-owners within the GMID has fallen dramatically. The proposed use of the site as a solar farm, the use of irrigated water would not be required which would result in more water being available for other surrounding farms in the region.

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For the subject site, a large section of the irrigation area (39ha or 40%) which is located in the centre of the property, is characterised by long bays (up to 690m) that are relatively flat. The characteristics of these bays would limit their capacity to achieve good water use efficiency. The current landowner has indicated that the start-up irrigation takes up between 15 to 18 hours to water a single bay. Whereas ideal watering times would be 4 to 6 hours.

In general, the water environment has changed significantly over the past 10 to 15 years with reduced water availability resulting in an increased water price. Therefore, irrigated farms need to increase the efficiency of their water use by improving the onsite irrigation infrastructure. Improved infrastructure allows for improved flow rates which increases the ability of the farm to grow and remain competitive for water. In terms of the subject site, for the farm to remain financially viable, water efficiency would need to be improved by upgrading current infrastructure.

Clause 14.02-3 (Protection of Declared Irrigation Districts) aims to plan and manage for sustainable change within irrigation districts declared under Part 6A of the *Water Act 1989*. Strategies include:

- *Identify and plan for the future needs of communities to adapt and adjust to land use change within an irrigation district;*
- *Protect agricultural land serviced by irrigation infrastructure to ensure the future viability of an irrigation district;*
- *Ensure non-agricultural land use does not undermine the integrity of irrigation infrastructure and complements existing and future agricultural production;*
- *Ensure land use change within an irrigation district does not negate the potential opportunities for a rural water corporation to make adjustments to the footprint of an irrigation district that are identified under an approved plan or strategy; and*
- *Ensure land use change does not limit the ability of future investment in irrigation infrastructure that achieves the intended benefits of minimising water loss, and improved irrigation service efficiency to the farm gate and overall agricultural production.*

The proposed use of the site as a solar farm acknowledges and respects the above-mentioned strategies. The development of the solar farm will not impact any of the current infrastructure on the site and surrounds, allowing the rural water corporation to continue existing efforts. The proposed use will not impact the existing backbone channel and service point and this infrastructure will remain in place for future use as the proposed use is temporary in nature. Furthermore, the private drainage channels on the site do not connect through to other properties so there will be no impact on surrounding farms or irrigation channels. Sheep grazing will also continue on the site during the life of the solar farm operation. Therefore, the site will retain part of its original agricultural use.

Decommissioning of the solar farm (including the removal of solar infrastructure) would also allow the site to return to full agricultural use. Furthermore, whilst the property is not proposed to be irrigated, the annual fee will still be paid directly to GMW via DS which contribute the ongoing viability of the irrigation district.

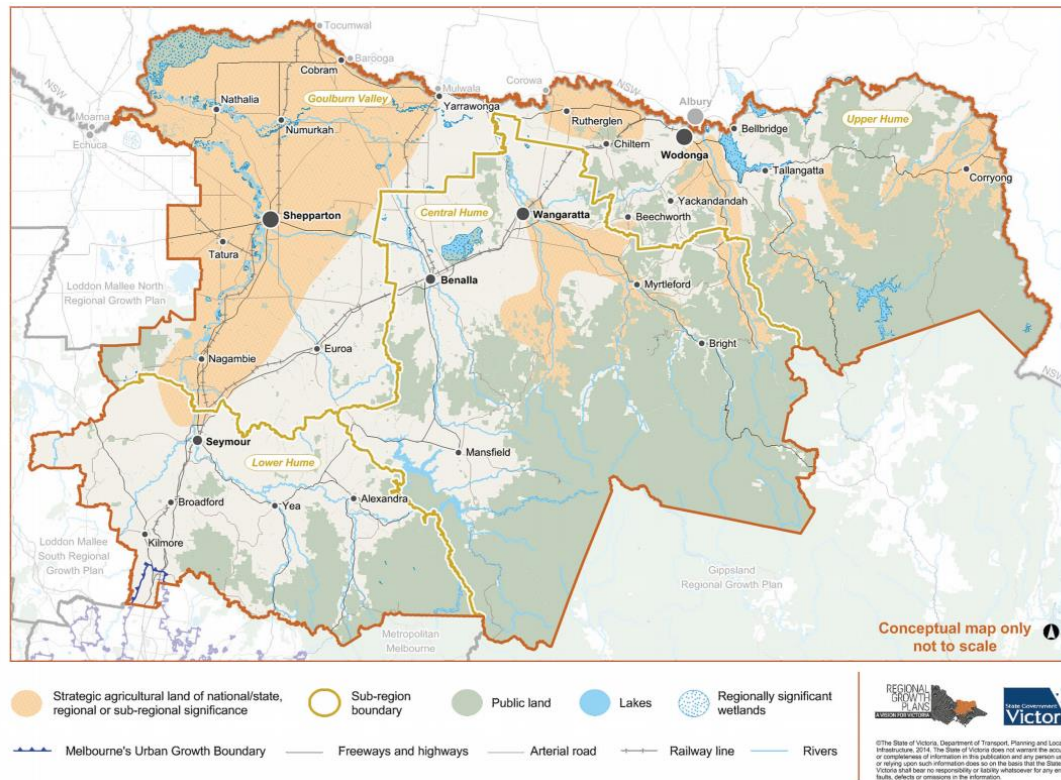
5.3.2 Agricultural Land

The Hume Regional Growth Plan is generally supportive of renewable energy development to diversify the economy and ensure security. The plan recognises the economic benefit that uses other than traditional agriculture can provide to the regions, and such uses are broadly supported. The site is located in the Hume Regional Growth Plan and identified as Strategic Agricultural Land.

Figure 5-4 Hume Regional Growth Plan – Strategic Agricultural Land

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Noting the approximate 30-year lifespan of the solar farm, the land will be rested from dry-land cropping activities, whilst grazing activities are intended. It is anticipated that sheep will be able to be grazed on the subject site during the operation of the solar farm, which will reduce the need for mechanical slashing on the vegetative ground cover underneath and in between the solar arrays and provide useful maintenance of the ground cover, particularly in summer when bushfire prevention is necessary. Considering the 30-year lifespan of the project, it is intended that this is a temporary use and that the land can be used for agricultural purposes in the near future.

At the end of the solar farm's lifespan, the land is anticipated to return to agricultural land use once it is decommissioned. The project will not result in the fragmentation of land. It is expected a condition on any permit issued will include requirements for a decommissioning plan to be prepared at the time of decommissioning.

An Agricultural Land Assessment was prepared by RMCG (Appendix F) to analyse the local climate, soils and topography and vegetation to assess agricultural capability and capacity. The site represents a small proportion of the total available land to dryland agriculture within the region and is unlikely to have any strategic effect.

The surrounding land is currently being used for a range of agricultural activities including dairy and mixed farming enterprises. There are no horticultural enterprises in the immediate vicinity of the site and therefore there will be no implications on the agricultural activities of the neighbouring properties.

The site can be described as having approximately:

- 40% Group II soils (Shepparton fine sandy loam);
- 30% Group III soils (Lemnos loam, Erwen Loam normal phase);
- 20% Group VI soils 9 (Soils of prior stream beds Type 2); and
- 10% Group V soils and unidentified soil (Congupna clay loam, Goulburn clay loam).

Forty percent (40%) of the area is classified as Group II soils (Goulburn Valley Area -Legend to soils and crop suitability grouping) which are quality soils suitable for horticultural crops (except citrus) such as cereals, lucerne, perennial and annual pastures. However, its distribution across the site is patchy,

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making it impractical to fully utilise these soils. These soils are also at risk of inundation as the areas are identified as subject to inundation. Horticultural crops are highly susceptible to inundation.

Group III soils are considered good for a range of irrigated crops. Whilst they are good soils, they are not as productive as Group I and Group II soils. The majority of Group III soils is that the majority are located on areas that are not developed for irrigation. Furthermore, the topography of the site is limited considering that the soil type is located in the northern section of the property, which is unsuitable for gravity irrigation.

Group IV soils are not recommended for irrigation and represent the lowest quality soils in the region.

The current land is farmed for prime lamb production and cropping purposes. The total combined agricultural output from the site is assessed as being in the order of \$200,000. A typical farm needs to generate about \$250 – 500k gross income in order to have sufficient net income for one family farm. Therefore, the property is considered to have marginal return.

ABS data for 2015/16 shows the total agricultural value for the Greater Shepparton Shire at \$555,525,447. Therefore, the production from this property represents 0.04% of the Council's agricultural production. From a state perspective, the property represents 0.002% of the state's agricultural value of output. From these numbers, the potential economic output from the site is considered insignificant at a regional and state level.

Data from the Goulburn Murray Irrigation District Technical Report shows that in the Central Goulburn area, the site represents approximately 0.61% of the missed farming properties, which in turn is only 20% of the area, used for agriculture in the Central Goulburn irrigation area. It is considered that the site area and potential loss of land is insignificant at a regional level and the loss of the agricultural production from the proposed site is insignificant at a regional and state level.

Clause 14.01-1 (Protection of Agricultural Land) of the Planning Scheme aims to protect the state's agricultural base by preserving productive farmland. Strategies include:

- *Identify areas of productive agricultural land, including land for primary production and intensive agriculture;*
- *Avoid permanent removal of productive agricultural land from the state's agricultural base without consideration of the economic importance of the land for the agricultural production and processing sectors;*
- *Protect productive agricultural land from unplanned loss due to permanent changes in land use; and*
- *In considering a proposal to use, subdivide or develop agricultural land, consider the impacts on the continuation of primary production on adjacent land, with particular regard to land values and the viability of infrastructure for such protection.*

As made evident by this section of the report it is clear that the subject site is not identified as productive agricultural land. Therefore, the proposal is not limiting or removing any existing productive agricultural land. Furthermore, the proposed solar farm will not have a permanent impact on the agricultural status of the land. Whilst being used for energy purposes, sheep grazing will occur and no existing irrigation infrastructure will be impacted. Therefore, the proposal will not have a negative impact on the surrounding land as the existing irrigation infrastructure is not connected to any other properties. The surrounding properties also include various land uses and are not reliant on the subject site.

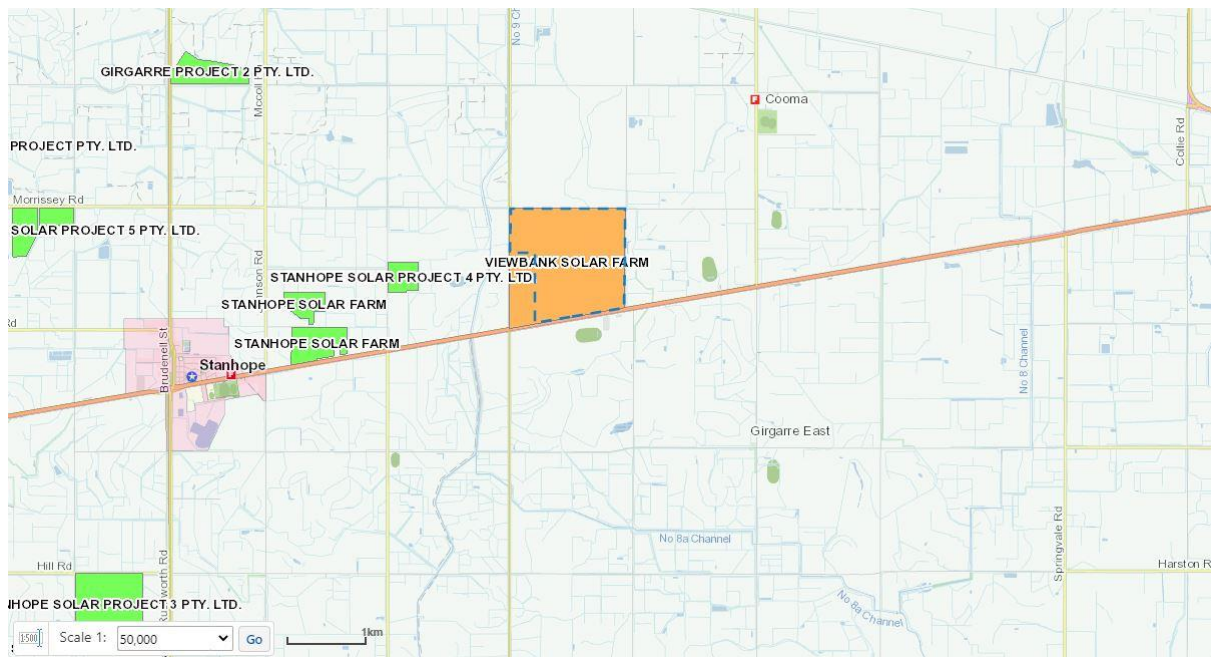
Noting the lack of good quality soils on the site, it is considered that a Solar Farm is an appropriate use of the site considering that this use can still accommodate for the purpose of the Farming Zone. The proposed land use will provide local employment, supplier and business opportunities through the development of the Solar Farm.

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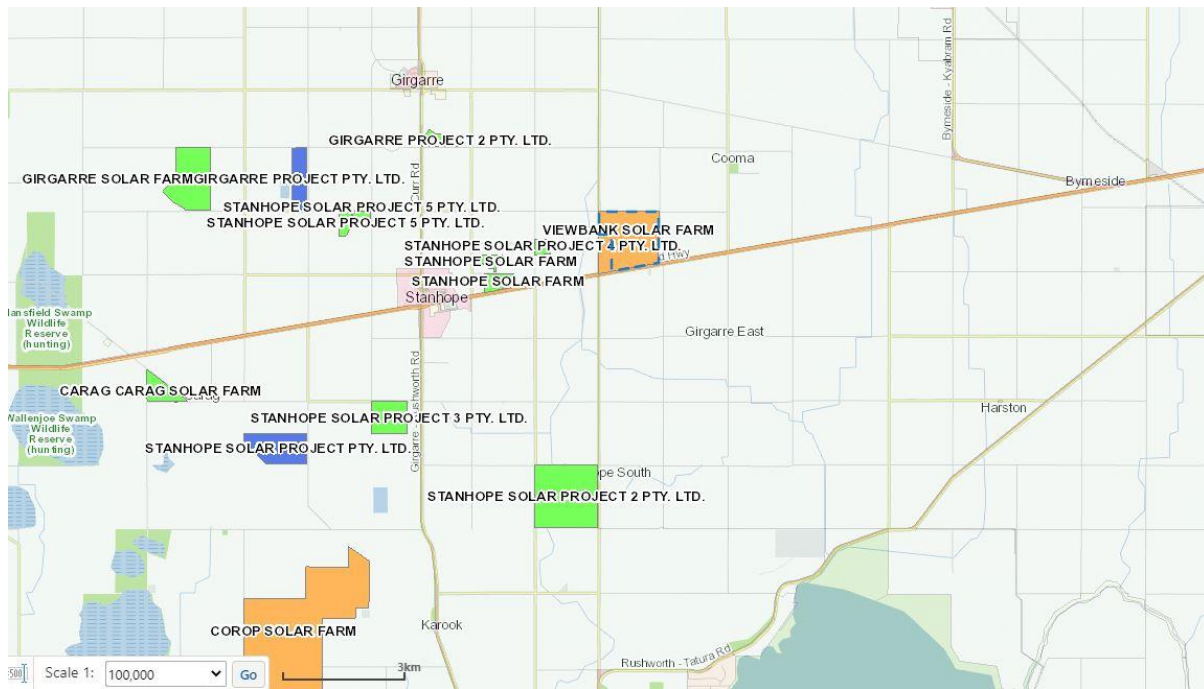
Figure 7 includes an excerpt from Vicplan which shows the proposed and existing solar farms within the area. The figure shows that to the west of the subject site, there are a number of smaller solar farms towards the township of Stanhope. There are no solar farms located to the east of the site. Whilst there are a number of solar farms within the surrounding area, the proposed solar farm is located within a pocket with limited renewable facilities. As discussed in this section, the current farming practices on the site do not grossly contribute to the surrounding area and are not seen as a loss as this proposed use will not be a permanent change to the land use.

Figure 5-5 Solar Farms within the Surrounding Areas



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5.3.3 Similar Planning Applications for Solar Energy Facilities

The Agricultural Land Assessment at Appendix F outlines a number of previous solar farm applications in the Farming Zone and irrigated areas that have been assessed. The following examples demonstrate that these facilities did not represent a loss of significant agricultural land, nor would they affect the ability of farming on neighbouring agricultural land.

VCAT issued a planning permit for the construction of a solar energy facility at Naring (Moirā Shire Council) on the basis that:

Having regard to the generally benign nature of the proposed use, the proposal is unlikely to adversely impact on the capacity of surrounding agricultural land to continue to be used for that purpose; and It is of some relevance that the proposal will not permanently or irretrievably remove the site from agricultural production. Upon decommissioning of the use, the site is capable of being restored to agriculture use. Furthermore, the Minister for Planning approved four solar energy facilities in the City of Greater Shepparton in 2018. A Planning Panel considered applications and recommended that the Minister for Planning issue all four planning permits. The Panel included the following findings with regards to agriculture:

- *The use of the subject land areas for solar energy facilities is consistent with priority agricultural land-use in State planning policy and uses in the Farming Zone. Using and developing the subject sites for solar energy facilities can, subject to appropriate permit conditions, harmoniously achieve agricultural production and renewable energy outcomes. The four proposed solar energy facilities, individually and cumulatively, will not remove agricultural land to the extent that would conflict with State or local planning policy;*
- *Any temperature increase within 30 metres will be negligible, however, any photovoltaic array should be separated by this distance from any neighbouring property boundary. Accordingly, neighbouring residences, orchards, horticulture, farming for cattle and livestock, and insect population numbers will not be impacted by the solar energy facilities; and*
- *The Farming Zone is appropriate for the four solar energy facilities. The facilities are of a scale that cannot be accommodated in existing industrial zoned areas. They will not adversely impact surrounding existing and future farm operations, or the broader Irrigation District. The soil types on the subject land are lower quality than other parts of the Irrigation District with higher value agricultural production.*

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5.3.4 Engagement with GMW

The “Solar Energy Facilities Design and Development Guideline (Department of Environment, Land, Water and Planning, August 2019)” suggests that “if a proponent plans to locate a solar energy facility in an irrigation district, it should consult early with the relevant rural water corporation, to determine the appropriateness of the location”.

FRV and ERM have been attempting to engage with Goulburn Murray Water (GMW) to obtain pre-application advice since September 2019. Due to GMW’s logistical issues, the project team did not receive a referral response (Stage 1 of the pre-application process) until 12 February 2020. In addition to the above, the project team requested a pre-application meeting with GMW in October 2019, however no response was ever received.

After initial discussions with DELWP Planning, they internally followed up with DELWP – Water in December 2019, as it was considered necessary to get some level of feedback on the project from an irrigation perspective. From that process we were encouraged to continue to engage with GMW (which was occurring).

Overall, this demonstrates that the project team have been seeking advice from GMW since the start of the process as the advice is considered to be valuable because GMW is a critical stakeholder. After this period, the project team continued to engage with GMW to obtain comments as part of the Stage 2 pre application process. On 20th July 2020, GMW advised the project team to engage with DELWP Water instead. The project team also held a pre application meeting with DELWP Planning and DELWP Environment in April 2020. DELWP Water were invited but did not attend the meeting.

In July 2020, a meeting was held with the project team with DELWP Planning and DELWP Water where advice was provided. This advice included concerns with the proposal because of internal policies that do not support any solar farms within an irrigation district. It is noted that there is no planning policy that states such a fact and a response has been provided to this concern in Section 5.3 of this report.

5.4 Amenity Impacts

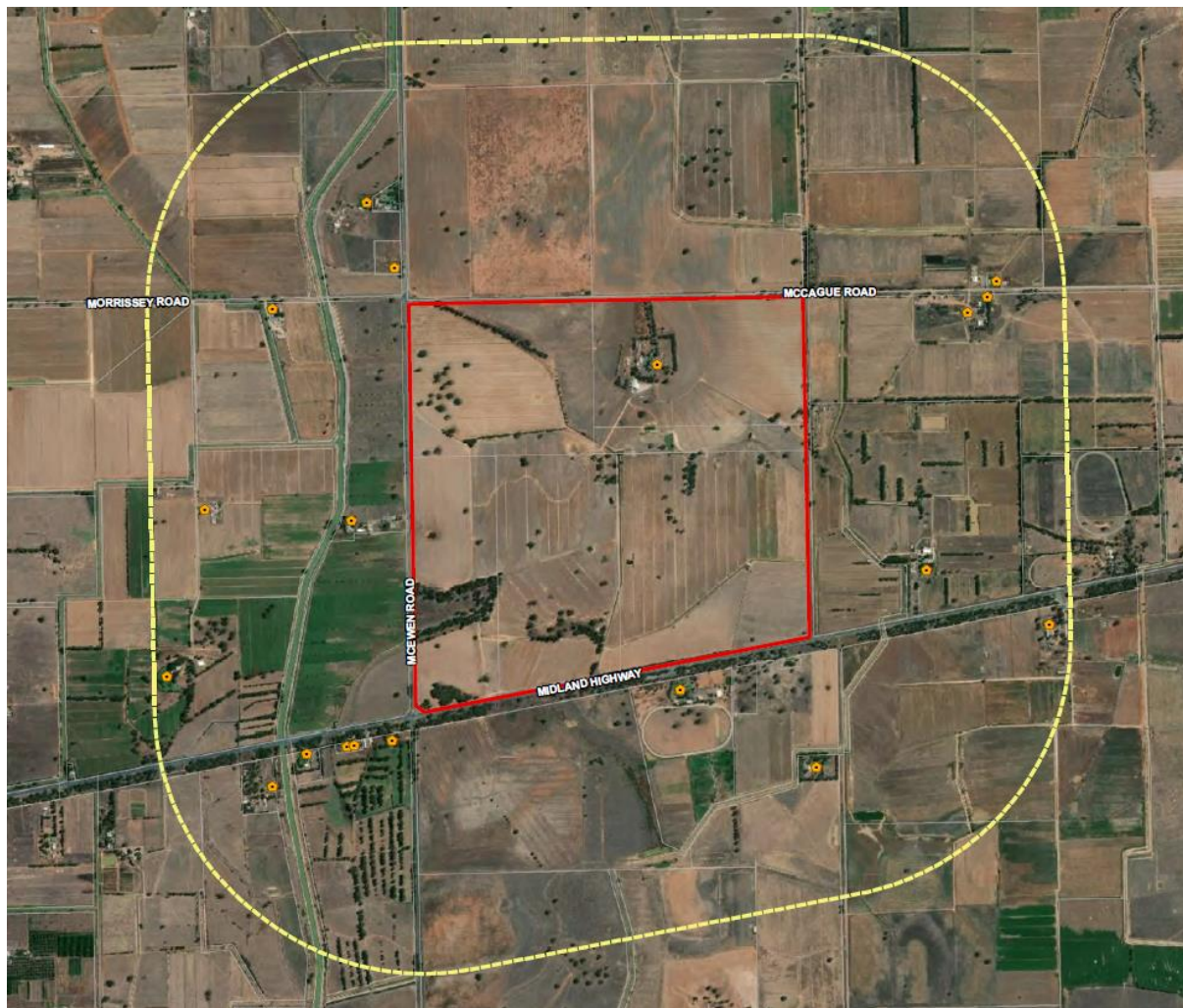
5.4.1 Reducing Impact to Neighbouring Properties

There are 18 dwellings within a 1km radius of the site (see Figure 5). Most of the dwellings are scattered but a small cluster is located to the north-east and south-west of the site.

Figure 5-6 Dwellings within a 1km Radius of the Site

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Communication between FRV and adjoining landowners (and the broader community) has been initiated and will continue and a feedback process will be put in place should any concerns arise.

The proposed development achieves a minimum setback of 30m around the site, with much of the site exceeding the 30m setback minimum.

In terms of traffic impacts, the Traffic Impact Assessment (Appendix E) concludes that the proposed Solar Farm will have minimal impact to the operation of the existing road network. Measures to be undertaken to minimise impact include providing the main access to the site from Poole Road, which will limit queuing along Midland Highway. Furthermore, at peak construction, the Solar Farm traffic will add approximately 177 one-way vehicles per day. Having consideration for the short construction period alongside traffic management strategies, there should be relatively minimal impact on the surrounding area.

Noise impact to adjoining properties will be considered and a Noise Assessment will be provided to DELWP acknowledging this, in due course.

It is expected a condition on the permit will require a Construction Management Plan and Operation Management Plan be submitted to the satisfaction of the responsible authorities. These plans would provide direction on how the site would be managed through constructions and through operations, on matters such as management of construction hours, management of dust risks, and management of pests.

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5.4.2 Landscape and Visual Impact/Photomontage

A Landscape and Visual Impact Assessment has been prepared by Greenbean Design at Appendix Q. The LVIA determined that the landscape surrounding the solar farm site, as well as landscape on the broader viewshed, has a low visual sensitivity to change and a relatively high visual absorption capability.

The LVIA determined that the visual impact of the solar farm is likely to be low for dwellings and key public view locations and that the Viewbank Solar Farm:

- Will have no visual impact on the principal rural townships within the surrounding landscape;
- Will result in no significant impact on views from local roads and highways;
- Will result in no significant cumulative visual impacts, and
- Will result in no significant visual impact from key public viewpoints.

A Photomontage Assessment prepared by Green Bean Design has been provided at Appendix M. The results concluded that the Solar Farm would have an overall low visual impact on adjoining properties and on the surrounding landscape. The Photomontage Assessment has been prepared showing the panels at the most extreme (or maximum) tilt angle possible as a worst case scenario. This scenario would only apply during the first and last hour of the day.

Landscape features surrounding the proposed solar farm are robust and the introduction of constructed elements associated with the solar farm would not be incongruous with the surrounding landscape. The proposed solar farm would generally complement the scale, landform and land use pattern of the surrounding landscape and will not create a noticeable deterioration in existing views from most sensitive view locations.

Views toward the proposed solar farm from sections of the Midland Highway corridor would be screened and/or partially filtered by roadside tree planting and trees within the south west portion of the proposed solar farm site. The proposed solar farm site would be visible to local traffic from Poole Road, McEwen Road and McCague Road. Views would be transitory and short term in nature but likely to occur on a regular basis for those travelling to and from local dwellings.

Approved solar farms including the Stanhope Solar Farm projects around 5 km to the south, and 1 – 2 km west of the proposed solar farm site. The potential for direct and indirect cumulative visual impacts would be largely mitigated by distance between solar farms as well as tree cover surrounding dwellings. Sequential cumulative visual impacts may occur from the Midland Highway but would be limited where approved solar farms are offset and not visible from the highway corridor

5.4.3 Glare/Glint

The glare assessment prepared by ERM, is based on the Forge Solar Glare Gauge Analysis Tool (provided at Appendix J).

The Glare Assessment was undertaken for the parameters of a 2m and 4.2m high Single Axis PV trackers with smooth glass and an Anti-Reflective Coating applied. The results showed that the single axis rotational PV array configuration results in no potential glare impacts to neighbouring properties and roads (McCague Road, McEwen Road, Midland Highway and Poole Road.

Furthermore, the presence of existing vegetation, buildings and landscape screening along the site boundaries will largely obstruct any views of the facility and offset any potential glare impacts. The use of antireflective coating on the PV arrays has further reduced the potential for glare impacts occurring from these locations.

5.4.4 Noise

A noise assessment prepared by ERM has been provided at Appendix N.

The noise assessment includes the inverters across the site, as described in Table 6.1 of the Noise Report. The noise contribution from these inverters is only 48 dBA therefore noise levels at approximately 2m away would be less than 36 dBA.

During the construction period, the core hours of onsite activity are between 7am and 5pm each weekday. Work may need to be undertaken on Saturdays from time to time. Construction hours on a Saturday would be 9am to 5pm unless otherwise advised. If work is to occur outside normal working hours as defined by the EPA, the project will comply with the applicable noise limits specified in EPA publication 1254 for work undertaken outside of normal working hours.

It is expected that a condition on any permit issued will require a Construction Management Plan, which will specify construction hours and noise requirements.

5.4.4.1 EPA's Noise from Industry in Regional Victoria (NIRV)

The guidelines provide the methods to set noise levels for industry in regional Victoria by providing a balance between protecting community wellbeing and amenity near industrial premises and supporting the social and economic value of industry in regional Victoria. The guidelines set out recommended maximum noise levels.

The recommended maximum noise levels for utilities is:

- Day 45 dB(A);
- Evening 39 dB(A);
- Night 34 dB(A).

The noise assessment summarised the relevant noise levels for the project:

- The highest predicted (Leq, 30 minute) noise level is 60 dBA at R16 associated with the "Site Preparation and Establishment" (CON01). R16 is the closest receptor to the south of the site, in close proximity to the proposed Substation and BESS sites.
- The highest (Leq, 30 minute) noise levels associated with the "Site Preparation and Establishment" (CON01) i.e. >50 dBA are predicted at receptors R10 to R18.
- The highest (Leq, 30 minute) noise levels associated with the "Delivery of Infrastructure" (CON02) i.e. >50 dBA are predicted at receptor R16.
- The highest (Leq, 30 minute) noise levels associated with the "General Construction of Infrastructure" (CON03) i.e. >50 dBA are predicted at receptors R12 to R18.

These predicted noise levels are associated with predicted 30-minute noise values calculated via modellings for the purposes of the assessment in accordance with the Publication 1254. The predicted noise levels will only be experienced for limited periods of time when works are occurring (in close proximity to each receptor); they will not be experienced for full daytime periods.

5.4.5 Responding to Community Concerns

A Stakeholder Management Plan has been prepared for the project, which outlines how community or stakeholder concerns or feedback will be able to be communicated to FRV, and what the grievance management process will be. Refer Appendix G for the Stakeholder Engagement Plan and Community Letter.

Consultation on the project has commenced, and will continue through the course of the planning application. Letters have been sent to neighbouring properties, however, no consultation discussions have been held.

During construction, the appointed lead construction contractor would establish and maintain a hotline for complaints and concerns relating to amenity impacts related to on-site activities. FRV will monitor the contractor's handling of complaints and ensure that the community receives appropriate responsiveness and that issues are being addressed appropriately.

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5.5 Biodiversity

Protection of native vegetation is a key driver of the proposed layout. Refer to the Flora and Fauna Assessment undertaken by Ecolink Consulting within Appendix D for further information on the vegetation removal.

Overall, as part of the Flora and Fauna assessment, the subject site was found to include four ecological vegetation classes. Of significance is the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) threatened ecological community: Grey Box (*Eucalyptus microcarpa*) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia. The vegetation was located along the southern road reserve of the Midland Highway. Care has been taken to avoid the removal of vegetation in this area, as can be seen on the layout plan (refer Appendix C).

There are three threatened flora species previously recorded within three kilometres of the study area: Buloke *Allocasuarina luehmannii*, Common Joyweed *Alternanthera Nodiflora* and Branching Groundsel *Senecio Cunninghamii var. Cunninghamii*. A further five threatened flora species are predicted to occur within the study area based on the Protected Matters Search Tool (Department of Agriculture Water and the Environment 2020a).

The current assessment recorded one Buloke in the study area, which is listed as Endangered within Victoria (Department of Environment and Primary Industries 2014) and listed under the FFG Act. There are no historical records of threatened flora species within the study area. The high level of modification associated with agricultural development of the study area make it highly unlikely that any threatened flora species, other than the recorded Buloke, persist within the study area, or will be impacted by the proposed development of the study area.

The artificial wetland in the south-west of the study area is likely to support a range of species from different groups. Although the vegetation surrounding is not classified as native vegetation, this area is considered to be of moderate ecological constraint as the area may support a small number of threatened species.

In terms of vegetation to be removed; 0.237 ha of the lowest quality native vegetation patches are proposed to be removed (out of a total of 4.79 ha, or 6% of the native vegetation patches within the study area. In addition, eight Scattered Trees (one small and seven large), out of the 115 Scattered Trees (or a loss of 7%) are proposed to be removed.

The limited removal of biodiversity on the land and continued grazing use responds to the management measures of the Goulburn Broken Catchment Management Strategy which includes:

- Work with landholders to protect and improve biodiversity on private land and build understanding of its contribution to sustainable and profitable farming;
- Create awareness and acceptance of sustainable management practices to improve land and soil condition;

Offsets of vegetation to be removed will be sought through required measures, refer to the Nature Advisory Flora and Fauna Report within Appendix D for additional information.

5.5.1 Avoid, Minimise, Offset Statement

The purpose of this provision is to ensure that impacts on native vegetation do not result in a net loss to biodiversity and do not significantly degrade the land and water. This provision refers to the requirements of the *Guidelines for the removal, destruction or lopping of native vegetation, 2017*, an incorporated document to the Planning Scheme. An assessment against the above mentioned guidelines has been discussed in Ecolink's Biodiversity Assessment (refer Appendix D).

Pursuant to this clause, a permit is required to remove, destroy or lop native vegetation, including dead native vegetation. Exclusions are listed in Clause 52.17-7. The project proposes the removal of seven large Scattered Trees, one small Scattered Tree and 0.273ha of native vegetation patches. As

such; a permit is required pursuant to Clause 52.17-1. Offsets are to be provided, as specified within DELWP's Native Vegetation Report (refer Appendix K).

The layout of the proposed solar farm was driven by the need to avoid as much vegetation as possible, and where impacts were to occur, to minimise the impact of the loss of that vegetation through protecting patches, as many large trees as possible and protecting dead trees that provide habitat.

Given the high level of vegetation protected onsite, and noting the care that has been taken in the layout plan to protect the vegetation onsite, the application is considered to demonstrate an avoid, minimise and offset approach in accordance with DELWP's expectations.

Solar farms require a minimum quantity of solar panels to be electrically connected to each inverter station. This creates a modular style of design for solar farm layouts, consisting of 'blocks' of panels. Breaking up the layout of these 'blocks' (i.e. increasing the distance between the panels and the inverter they are connected to) requires longer distances of cabling and trenching, having a knock on effect of increased costs, more disruption to the site for trenching and poor electrical efficiency due to longer cables. FRV need to balance the above with the requirement to ideally retain all indigenous native trees and vegetation patches.

In addition to avoiding the disruption of continuous 'blocks' of panels, retained trees are a source of shade on the solar panels, meaning the layout must accommodate the tree being retained, its Tree Protection Zone, and a setback so that panels are not in the shade of the tree. This can result in a large area, depending on the tree height and location.

Initial design revisions attempted to retain all 115 scattered trees (including dead trees) and 39 patches of native vegetation, however this was not possible.

When shifting the modular 'blocks' to avoid as many trees as possible, there were several options found for the revised design. To select the trees to be removed, trees classified as 'small' were a preference for removal over 'large' trees as classified on pages 22-24 of the Ecolink report (at Attachment D).

A majority of scattered trees are being retained, and have a Tree Protection Zone of 15m applied to them. Seven large trees are proposed to be removed. The Tree Protection Zone has not been applied to dead trees.

Retained trees will also be protected by ensuring that works affect less than 10% if the TPZ in accordance with the Australian Standard for the Protection of Trees within Development Sites (AS 4970 – 2009). A 15 metre buffer will be applied to all trees, including those within patches of native vegetation to ensure that no impacts occur.

A Native Vegetation Removal Report issued by DELWP has also been provided at Appendix K.

5.5.2 Potential Cumulative Impacts

Clause 12.01-1 of the Greater Shepparton Planning Scheme outlines that decision making when it comes to impacts on biodiversity should take into consideration cumulative impacts, fragmentation of habitat and the spread of pest plants, animals and pathogens into natural ecosystems

The surrounding landscape is highly disturbed and native vegetation is fragmented and scarce. Native vegetation has been largely cleared to allow for irrigated crops and other agricultural activities to take place. The project proposes to retain and, importantly, protect, a significant amount of existing vegetation on the site. The proposed native vegetation removal is minor compared to the scale of the site and surrounds and is not anticipated to result in unreasonable cumulative impacts.

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5.6 Heritage

As recommended by the Cultural Heritage Assessment prepared by Andrew Long and Associates (Appendix L), it was recommended that because the activity area contains a prior waterway (which is considered to be an area of cultural heritage sensitivity) and the proposed activity (the construction of a solar farm (is a high impact activity), that in accordance with r.7 of the regulations, a mandatory CHMP is required.

A mandatory Cultural Heritage Management Plan is currently being prepared for the project by Andrew Long and Associates.

5.7 Traffic

Cardno were engaged by ERM to undertake a traffic impact report, assessing the impact of heavy vehicles to the local road network during construction and operations. Refer to Appendix E for a copy of the report.

5.7.1 Traffic Impact

During construction, the solar farm is expected to generate 354 additional daily traffic movements during the peak construction period. During peak construction 60 vehicle movements (17%) are expected to be heavy vehicle traffic. This level of traffic is expected to have minimal impact on the surrounding network, given the short period of time during peak construction.

It is anticipated that the main access will accommodate 2 to 3 staff and approximately 4 to 6 daily movements. On occasion, some additional movements associated with maintenance that is more thorough are expected. These nominal numbers are not expected to have any impact on the surrounding network.

Furthermore, the addition of a utility installation within the Road Zone Category 1 will not impact the operation of the road or public safety. Any future development will be located in a location where no physical or visual impact will result.

5.7.2 Access

5.7.2.1 Operation

During operation, the main access to the site will be accessed from Poole Road with an emergency access point from McEwen Road. A series of gravel roads will provide access around the site and to the solar modules.

5.7.2.2 Construction

During construction, site access is proposed to be via Poole Road and approximately 130m north of Midland Highway. As the traffic volume along Poole Road is expected to be low, it is unlikely that construction vehicles will queue back onto Poole Road. Further analysis is expected to be completed as part of a Traffic Management Plan following confirmation of source material locations, construction methodology and schedule of works.

In terms of construction, the anticipated route for heavy vehicles are as follows:

Port of Melbourne, Footscray Road, West Gate Freeway, Western Ring Road, Hume Freeway, Goulburn Valley Freeway, High Road, Bendigo-Murchison Road, Gigarre-Rushworth Road, Midland Highway, Poole Road and Site Access.

These roads are VicRoads pre-approved B-Double routes, includes of the Council controlled McEwen Road. Poole Road is not a pre-approved B-Double route and therefore additional upgrade works may be required on the short section of the road from Midlands Highway to the site access.

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The vehicles travelling on this route will be delivering solar farm componentry including solar modules, panels and substation elements are likely to be sourced internationally via the Port of Melbourne.

Hardstand areas and access tracks are to be constructed of coarse and fine gravel and the delivery of these materials will access the site via Midland Highway and other local roads as required.

Dust settling water will also be used during the drier months of construction and this water is likely to be sourced from Shepparton-Mooroopna or Stanhope via the local road network.

Construction staff are also anticipated to be accommodated in Shepparton-Mooroopna or other local towns including Stanhope and Tatura. It is expected that they will access the site via Goulburn Valley Highway and Poole Road.

5.7.3 Car Parking

Details regarding temporary car parking facilities have not been addressed. Generally, a temporary car park will be set up on the construction site, near the administration area and close to the site entrance. Permanent car parking for an appropriate number of spaces will be available post construction and will be located to the north of the office building, with the ability to use the internal access tracks as required.

5.8 Surface Water Impact

A Surface Water Assessment was provided by Water Technology (Appendix H) and outlines that the proposed solar farm layout was informed by the flood modelling which was undertaken as part of the preparation of the Surface Water Assessment and feedback from engagement with the floodplain authority. The Assessment also provides a response to relevant planning controls.

The LSIO seeks to identify land in a flood storage or flood fringe area and ensure that development maintains free passage and minimises flood damage.

The FO seeks to identify areas that have the greatest risk and frequency of being affected by flooding whilst ensuring that any development minimises flood damage and is compatible with flood hazard.

The design of the solar farm layout is considered highly responsive to the flood risk. It is noted the advice included in the Surface Water Assessment states that additional solar arrays would be able to be placed into the shallow flood areas, however the proposed layout avoids nearly all shallow flood areas.

The surface water assessment confirmed that the existing Land Subject to Inundation Overlay (LSIO) and Floodway Overlay (FO) controls are likely to be over-estimated as they are based on a survey from the 1950s and the topography of the land has changed since.

Prior to the lodgement of the application, advice was sought from Goulburn Broken Catchment Management Authority (CMA). Their response (dated 16 October 2019) is included in Appendix I. Critically; they advised that the Goulburn Broken CMA would not object to the proposed Solar Farm, subject to the following conditions:

1. No building and works shall be placed within 30 metres of the depression as identified as Floodway Overlay (FO) in Figure 1. It was recommended that a survey be required to determine the thalweg location. However, it was found that there is no depression following the Flood Overlay as a thalweg could not be found. This further supports the opinion that the LSIO and FO are over estimated.
2. Operation and maintenance buildings, and the like, are to be located on highest available land with floor level set at least 300 millimetres above the general surround ground level;
3. Inverter buildings may be located in LSIO, provided their floor levels are set at least 300 millimetres above the applicable 100-year ARI flood.

The layout plan was prepared incorporating the advice of the CMA, as well as the recommendations

from Water Technology.

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Further to the advice of the Goulburn Broken CMA, it is noted that the stormwater draining of the solar panels is expected to be of a similar quality to rainwater. Runoff from the uphill panels will flow across the ground and under the downhill panels and it is unlikely to affect baseline surface water quality in the receiving environment. It is expected that a condition on any permit issued will require appropriate measures to manage stormwater as part of both construction and operation of the solar farm, and some recommendations on that point are made within the Surface Water Assessment.

In response to the Goulburn Broken Regional Catchment Strategy (RCS), the proposal is considered to be consistent with the focus of the Agricultural Floodplains area. The use and development of the land as a solar farm will not have any detrimental impact on the surrounding agricultural land and waterbodies.

Stormwater management is an important consideration on solar farm sites as the addition of panels across large areas has the potential to increase erosion and runoff if not treated properly. The proposal includes a shadow under each of the solar panels where rainfall will not fall directly on the ground. Therefore, runoff from the uphill panel will be able to flow across the ground and under the downhill panel. This will ensure that the solar panels do not decrease the existing impervious surface. As the panels will change direction to track the sun, the drop line of runoff from the panels will vary depending on the time of the day.

The design of the solar farm layout will also meet general stormwater management principles such as retaining vegetation cover across the site and providing a gap between each row of solar panels to allow for effective runoff.

Design of the solar farm can also allow for the current water supply channels to remain intact so that the land can be returned to irrigated agriculture after the life of the solar farm. The supply channel on the eastern boundary of the site (where the water metering point is) will not be impacted. Furthermore, anywhere the layout design shows panels over a drainage channel on the site, the channel will be back filled during construction.

Overall, the site has a low flood risk across the site and there will be limited impact on surface water flood risk issues as a result of the development of the land with solar panels.

5.9 Bushfire Risk

The site is not subject to a Bushfire Management Overlay, although it is within a designated bushfire prone area and the provisions of Clause 13.02-1S are relevant.

Clause 13.05 places a strong emphasis on the protection of human life over all other policy considerations. Careful consideration has been given to the design and siting of the proposal in accordance with the *Guidelines for Renewable Energy Installation, 2019* with specific measures incorporated to minimise and reduce fire risk.

In the CFA Guidelines there are a number of conditions regarding design features for access tracks, fire breaks, water storage, training and groundcover maintenance which have either been incorporated into the proposed layout design as per the CFA comments or can be added to conditions or specified within an Operational Environmental Management Plan or Construction Management Plan for the site.

Accordingly, the proposed solar farm is considered acceptable in terms of bushfire management under the Planning Scheme.

A Bushfire Risk Assessment has been provided at Appendix P. This document has also been provided to the CFA. Any comments received will be passed on to DELWP.

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5.10 Managing Environmental Risks

As required by Clause 13, planning should, amongst other things, aim to avoid or minimise natural and human-made environmental hazards, environmental degradation and amenity conflicts, and adopt a best practice environmental management and risk management approach.

As discussed elsewhere in this report, FRV has considered potential risks upfront, so they can be proactively minimised or mitigated. This is reflected in the layout of the project, particularly in terms of;

- Avoiding removal of much of the vegetation onsite;
- Implementing appropriate tree protection zones to ensure the native vegetation and wetland areas which are not to be removed are to be appropriately protected;
- Locating access to the site to avoid roadside and onsite native vegetation;
- Designing a layout plan that takes a highly conservative approach to flood risks; and
- Providing a minimum of a 30m setback around the subject site to respond concerns regarding heat island effects.

It is expected a condition on any permit issued will require FRV to prepare a Construction Management and Operational Management Plan. This will provide further opportunity for FRV to demonstrate what steps are being taken to minimise or negate environmental risks that cannot be addressed at this early stage of the project.

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6. CONCLUSION

This report supplements a planning permit application for the use and development of Viewbank Solar Farm. The layout of the solar farm was designed by carefully considering the subject site's context, natural environment, constraints and advice received from pre-application meetings with relevant authorities.

Existing 66kV distribution lines to the south of the site, which allows for the evacuation of the electricity generated by the solar farm via a new on-site substation. This means a minimal footprint for other distribution line easements that would have otherwise been required and makes efficient use of existing infrastructure.

The site is also located within the Goulburn Murray Irrigation District but the proposal does not aim to impact existing irrigation infrastructure or processes.

There is a lack of good quality soils on the site. For example, Class II soils are patchy and are not located in a large enough area to support utilisation. Therefore, it is considered that a Solar Farm is an appropriate use of the site considering that this use can still accommodate for the purpose of the Farming Zone. The proposed land use will provide local employment, supplier and business opportunities through the development of the Solar Farm.

Critically, the Project will not make permanent changes to the land and the land would revert to agricultural land use once the solar farm is decommissioned at the end of its 30-year lifespan.

The Project provides an opportunity to diversify the local economy and land use. The Viewbank Solar Farm will generate employment during construction and operation as well as opportunities for suppliers and contractors. Indirect economic benefits will also occur as part of the Project, particularly during construction where there will be a number of people working onsite who are likely to utilise local businesses, including food and drink premises.

The design of the solar farm has sought to minimise and avoid the removal of native vegetation wherever possible, with a specific focus on protecting the vegetation identified as providing habitat for significant species.

It is proposed to remove seven large Scattered Trees and one small Scattered Tree, as well as 0.273 ha of the lowest quality native vegetation in patches. This equates to a proposed loss of 6% of the total native vegetation patch areas (4.79) and 7% of the total Scattered Trees (115). There is specific focus on protecting all the native vegetation patches and vegetation that may provide valuable habitat. In this regard, the proposal is considered to achieve the 'avoid, minimise and offset' approach required for native vegetation removal.

Given the above, we submit the Viewbank Solar Farm is suitable for planning support.

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