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Goorambat East BESS

Planning Report

PREPARED FOR



DATE

24 August 2026

REFERENCE

0798824

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DOCUMENT DETAILS

DOCUMENT TITLE	Goorambat East BESS
DOCUMENT SUBTITLE	Planning Report
PROJECT NUMBER	0798824
DATE	24 August 2026
VERSION	Final
AUTHOR	Natalie Cefala
CLIENT NAME	ENGIE Australia and New Zealand

DOCUMENT HISTORY

				ERM APPROVAL TO ISSUE		
VERSION	REVISION	AUTHOR	REVIEWED BY	NAME	DATE	COMMENTS
Draft	000	Natalie Cefala	Glenn Murray	Jenny Luk	13.05.26	Draft for client review
Final	001	Natalie Cefala	Glenn Murray	Jenny Luk	26.05.26	Draft for client review
Final	002	Natalie Cefala	Natalie Cefala	Jenny Luk	26.06.26	Final for submission
Final	003	Natalie Cefala	Natalie Cefala	Jenny Luk	24.08.26	Minor amendments to address DTP RFI, Final for submission

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SIGNATURE PAGE

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Planning Report

0798824



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ACRONYMS AND ABBREVIATIONS

Acronym	Description
AEMO	Australian Energy Market Operator
AEP	Annual Exceedance Probability
AH Act	<i>Aboriginal Heritage Act 2006 (Vic)</i>
BESS	Battery Energy Storage System
BPA	Bushfire Prone Area
BOP	Balance of Plant
CEMP	Construction Environmental Management Plan
CFA	Country Fire Authority
CHMP	Cultural Heritage Management Plan
CHS	Cultural Heritage Sensitivity
COD	Commercial Operations Date
DFP	Development Facilitation Program
DTP	Department of Transport & Planning
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>
EP Act	<i>Environment Protection Act 2017 (Vic)</i>
FFG Act	<i>Flora and Fauna Guarantee Act 1988 (Vic)</i>
FZ	Farming Zone
GBCMA	Goulburn Broken Catchment Management Authority
GESF	Goorambat East Solar Farm
GETS	Goorambat East Terminal Station
kV	kilovolt
LFP	lithium-iron phosphate
LGA	local government area
MNES	Matters of National Environmental Significance
MW	megawatt
MWh	megawatt-hour
NEM	National Electricity Market
P&E Act	<i>Planning and Environment Act 1987 (Vic)</i>
PPF	Planning Policy Framework
REZ	Renewable Energy Zone
TRZ3	Transport Zone 3 – Significant Municipal Road
VTP	Victorian Transmission Plan
YYNAC	Yorta Yorta Nation Aboriginal Corporation

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1. INTRODUCTION

The Goorambat East BESS (the Project) is proposed to deliver a battery energy storage system (BESS) for large-scale electricity storage, supporting Victoria's transition toward a more renewable and reliable energy network. The Project is anticipated to have a storage capacity of up to 200 MW and up to 6 hours duration (up to 1,200 MWh) and would be co-located with the 250 MW Goorambat East Solar Farm (GESF), which became operational as of August 2026, with connection to the grid via the Goorambat East Terminal Station (GETS).

The Project is wholly located within the Benalla Rural City Council local government area (LGA), approximately 1.3 km south of Goorambat, and 175 km north east of Melbourne.

This planning report, together with the attached documentation, forms the planning permit application to the Minister for Planning (the Responsible Authority) pursuant of Clause 72.01-1. This report provides an assessment of the relevant provisions of the Benalla Planning Scheme and the Planning and Environment Act 1987 (Vic) (P&E Act).

This report should be read in conjunction with the Certificates of Title (Appendix A), the set of development plans (Appendix B) and supporting technical assessments, consisting of the following:

- Ecological Assessment (ERM, 2026) (Appendix C);
- Noise Impact Assessment (ERM, 2026) (Appendix D);
- Heritage Advisory Letter (ERM, 2026) (Appendix E);
- Traffic Impact Assessment (Impact Traffic and Transport Engineering, 2026) (Appendix F);
- Fire Risk Management Plan and Fire Safety Study (Fire Risk Consultants, 2026) (Appendix G);
- Landscape and Visual Review (Landform Architects, 2026) (Appendix H);
- Flood Impact Assessment (Water Technology, 2026) (Appendix I); and
- Consultation Summary Report (ENGIE, 2026) (Appendix J).

1.1 PROJECT RATIONALE

Victoria has legislated renewable electricity generation targets of 65 % by 2030 and 95 % by 2035, along with energy storage capacity targets of at least 2.6 GW by 2030 and 6.3 GW by 2035 according to the *Renewable Energy (Jobs and Investment) Act 2017* (Vic), as amended by the *Climate Change and Energy Legislation Amendment (Renewable Energy and Storage Targets) Act 2024* (Vic).

The Project aims to support these targets by delivering large-scale battery storage capacity to assist in integrating renewable generation, enhancing network reliability, and strengthening energy security for Victorian communities and businesses.

Co-locating a BESS within the GESF project minimises new disturbance by leveraging existing access, stakeholder relationships and proximity to the grid, while placing storage where it is operationally most effective to reduce curtailment and support system strength in the proposed Central North Renewable Energy Zone (REZ). The site balances setback to nearby dwellings, screening opportunities, flood avoidance, proximity to connection infrastructure, and constructability.

1.2 THE PROPONENT

International Power (Australia) Pty Ltd (the Proponent), a wholly owned subsidiary of ENGIE S.A., proposes to develop the Project in the Benalla Rural City municipality, in north-eastern Victoria. The Proponent is also the developer, owner and operator of the adjacent Goorambat East Solar Farm (GESF), which the Proponent constructed and is currently commissioning. The land on which this Project is located, as well as the GESF is owned by the entity Goorambat East Solar Farm Pty Ltd.

The Proponent has been active in Australia's energy market since 1996 and is an experienced developer, owner and operator of large-scale generation and storage assets across the National Electricity Market. The Proponent's current Australian portfolio of operational and under construction assets includes the 150 MW / 150 MWh Hazelwood Battery Energy Storage System in Victoria (commissioned June 2023, owned and operated by the Proponent), the operational 250 MW Goorambat East Solar Farm, the 200 MW / 400 MWh Pelican Point Battery Energy Storage System under construction in South Australia, the 489 MW Pelican Point gas fired power station in South Australia, and the Willogoleche and Canunda Wind Farms in South Australia. The Proponent also operates the Synergen fleet of peaking power stations in South Australia and retails electricity and gas to over 650,000 Australian customers through ENGIE Retail. The Proponent is supported by ENGIE S.A., a French multinational integrated energy company listed on the Paris and Brussels exchanges, which operates across approximately 30 countries with around 97,000 employees and is targeting 95 GW of installed renewable and storage capacity globally by 2030.

1.3 PROJECT TEAM

Table 1-1 lists the specialist consultants that have been commissioned by the Proponent, and contributed to this planning application, including a range of impact assessments which support the planning application (see appendices), and should be read in conjunction with this Planning Report.

TABLE 1-1 PROJECT TEAM

Technical Area	Consultant
Planning	ERM
Acoustics	ERM
Cultural Heritage	ERM
Ecology	ERM
Fire Risk	Fire Risk Consultants
Hydrology	Water Technology
Landscape and Visual	Landform Architects
Traffic	Impact Traffic and Transport Engineering

1.4 APPLICATION SUMMARY

A summary of the planning permit application details is provided in Table 1-2 below.

TABLE 1-2 PLANNING APPLICATION SUMMARY

Planning Summary	
Municipality	Benalla Rural City Council
Address	379 Goorambat-Chesney Road, Goorambat 3725
Area	~24 ha
Relevant Titles	Lot 1 PS927303N, Lot 2 PS927303N
Zones	Clause 35.07 Farming Zone (FZ) Clause 36.04 Transport Zone 3 – Significant Municipal Road (TRZ3)
Overlays	None
Other designations	Bushfire Prone Area (BPA)
Permit Triggers	35.07-1: Section 2 Use of land for a Utility Installation 35.07-4: To construct a building or carry out works associated with a Section 2 Use (Utility Installation) 35.07-4: Construction of a building within 40 m from a road in Transport Zone 3 35.07-4: Construction of a building within 100 m of a waterway 52.05: To erect a sign that provides business identification information about a business or industry on the land where it is displayed, which must not exceed 3 sqm. 52.17-1: A permit is required to remove or lop native vegetation
Relevant Particular Provisions	52.05 Signs 52.06 Car Parking 52.17 Native Vegetation 53.22 Significant Economic Development
Planning Scheme	Benalla Planning Scheme
Responsible Authority	Minister for Planning (Clause 72.01-1)
Application Pathway	Development Facilitation Program (DFP)

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2. SITE CONTEXT

2.1 SITE DESCRIPTION

The site, which is approximately 24 ha in area, is located approximately 1.3 km south of Goorambat, within the Benalla Rural City LGA, and is located 175 km north-east of Melbourne.

The GESF and the GETS land is owned/controlled by the Proponent as part of the GESF land acquisition. All necessary land tenure arrangements for construction, operation, and decommissioning are in place. The site for the proposed Project sits within the GESF and overlaps the GETS area.

It is noted that the land for the GETS has been subdivided by AusNet (approved by DTP 5 May 2025), and at the time of this planning application ownership will be transferred in the coming months for AusNet to operate the GETS.

The site consists largely of cleared agricultural land, reflecting the wider region's long-standing agricultural land-uses, with previous cropping and cattle grazing activities at the site prior to the construction of the GESF.

The site has existing accessways (which were constructed as part of the GESF) to Goorambat-Chesney Road, which runs along the eastern boundary of the site. Parallel to Goorambat-Chesney Road on the eastern side is a freight-only railway line, which runs between Benalla and Yarrawonga, via Goorambat.

There are two 220 kV transmission lines (Glenrowan Terminal-Shepparton Terminal and Dederang Terminal-Shepparton Terminal) which traverses the Project site, from south-east to north-west.

2.1.1 EASEMENTS AND ENCUMBRANCES

As shown in the Certificates of Title (Appendix A), an existing transmission corridor runs across the Project Area from the south-east to the north-west, comprising two adjoining easements (E-1 approximately 12.6 m in width and E-2 approximately 61.0 m in width, both originally in favour of the State Electricity Commission of Victoria, now operated by AusNet as transmission network service provider) with a combined width of approximately 73 m. The easement accommodates the existing 220 kV Glenrowan Terminal to Shepparton Terminal and Dederang Terminal to Shepparton Terminal transmission lines, as shown in Figure 2-1. Existing 220 kV transmission towers are typically in the order of 35–45 m in height, consistent with standard Victorian transmission infrastructure.

PS927303N also includes a 13.14m wide carriageway easement as a primary access point for AusNet to and from the GETS, using the existing accessway in the south-east of the Project Area, via Goorambat-Chesney Road, shown as E-3 on Figure 2-1.

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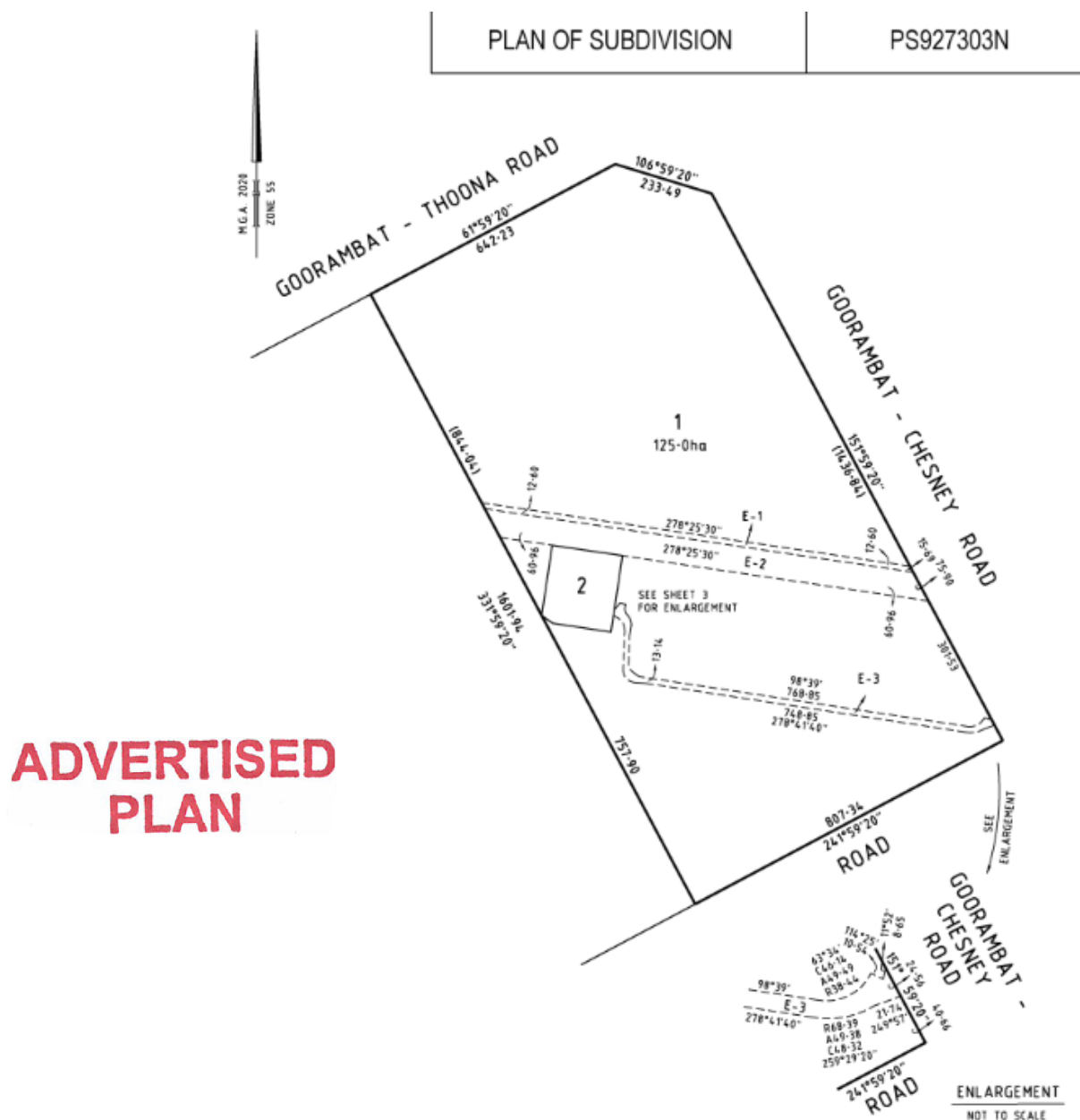


FIGURE 2-1 CERTIFICATE OF TITLE PROJECT PARCELS

2.2 SITE SURROUNDINGS

The GESF surrounds the Project in all directions, and surrounding land is largely agricultural in use. Along the eastern boundary of the Project is Goorambat-Chesney Road and the freight-only railway line, with the GESF continuing further to the east. To the north is Goorambat-Thoona Road, and further north along Goorambat-Chesney Road is the township of Goorambat, with Broken Creek to the west.

The region is largely flat plains. The site avoids major waterways and areas of higher environmental sensitivity identified through prior GESF assessments, which are largely located along Broken Creek, located about 2 km west of the site. Although a minor waterway passes through the Project Area, the Goulburn Broken Catchment Management Authority (GBCMA) determined during the GESF planning process that it no longer functions as a natural waterway, due to historic man-made changes for agriculture.





FIGURE 2-3 NORTHERLY AERIAL VIEW OF PROPOSED BESS AREA (ENGIE, 2025)

2.3 OTHER APPLICATIONS

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2.3.1 GOORAMBAT EAST SOLAR FARM

The Project is proposed to be co-located with the GESF, which received planning approval in January 2020 under Planning Permit P0102/019 (amended on 2 September 2022) with Benalla Rural City Council as the Responsible Authority.

The GESF is a 250 MW solar farm originally located across eight land parcels in the Parish of Goorambat, comprising Lots 1 and 2 TP399580 (now Lots 1 and 2 PS927303N), Lots 1 and 2 TP179662, Lot 1 TP161528, and Crown Allotments 39B, 41 and 59A on PP2704, totalling approximately 631 ha.

Following the registration of Plan of Subdivision PS927303N on 2 June 2026 (refer to Section 2.3.2), the GETS footprint has been excised into Lot 2 on PS927303N (which will be transferred to AusNet), with remaining land (including the GESF and the GoBESS Project Area) retained by the Proponent as Lot 1 PS927303N.

The GESF and GETS became operational as of August 2026.

2.3.2 SUBDIVISION APPLICATION OF THE GETS

AusNet applied for a two-lot subdivision and creation of a carriageway easement for 379 Goorambat-Chesney Road, Goorambat (Lots 1 and 2 of TP399580) to the Minister for Planning via the DFP (PA2403438). A permit was granted on 5 May 2025.

The Plan of Subdivision PS927303N was registered with Land Use Victoria on 2 June 2026, excising the GETS footprint within the former Lots 1 and 2 TP399580 into Lot 2 on PS927303N for transfer to AusNet as owner and operator of the terminal station. The remaining land, which includes part of the GESF and the entirety of the Goorambat East BESS Project Area (other than the GETS itself), will be retained by the Proponent as Lot 1 on PS927303N.

3. PROJECT PROPOSAL

3.1 OVERVIEW

The Project, located at 379 Goorambat-Chesney Road, Goorambat, on Lot 1 PS927303N (formerly Lots 1 and 2 TP399580), is a proposed BESS of up to 200 MW and up to 6 hours duration (up to 1,200 MWh). The proposed Project is co-located with the 250 MW GESF, which became operational in August 2026, and is located in Goorambat approximately 12 km north of Benalla, Victoria.

The Project will provide fast-response storage to support network reliability, integrate renewable generation and reduce curtailment by storing excess energy and discharging during peak demand. The Project leverages existing GESF infrastructure where practical (including the southern accessway, internal access tracks, construction laydown area, car parking and the GETS connection). GESF assets remain separate from this planning permit application, and continue to operate under Planning Permit P0102/019. Key proposed infrastructure and components include:

- Modular lithium-iron-phosphate (LFP) battery enclosures within fenced compounds;
- Power conversion systems (inverters/PCS) and MV step-up transformers;
- 33 kV internal collector network to a BESS 33 kV switchroom and control building;
- Fire safety systems (hydrants, water supply tanks and fire-breaks) designed in consultation with the CFA and to relevant Australian/International standards;
- Security fencing, CCTV, low-spill lighting compliant with AS 4282;
- A new accessway from Goorambat-Chesney Road (TRZ3);
- Internal access tracks, laydown areas, temporary construction compounds and stormwater/drainage controls;
- Operational and maintenance facility, car parking, and business identification signage;
- Stormwater management infrastructure;
- Site offices and amenities (re-using GESF facilities where available); and
- Landscape mitigation measures (native vegetation plantings, visual screening).

Figure 3-1 and Figure 3-2 show the current indicative layout based on known information at this stage, however, the proposed Project will require further design refinement, subject to planning approval and permit conditions.

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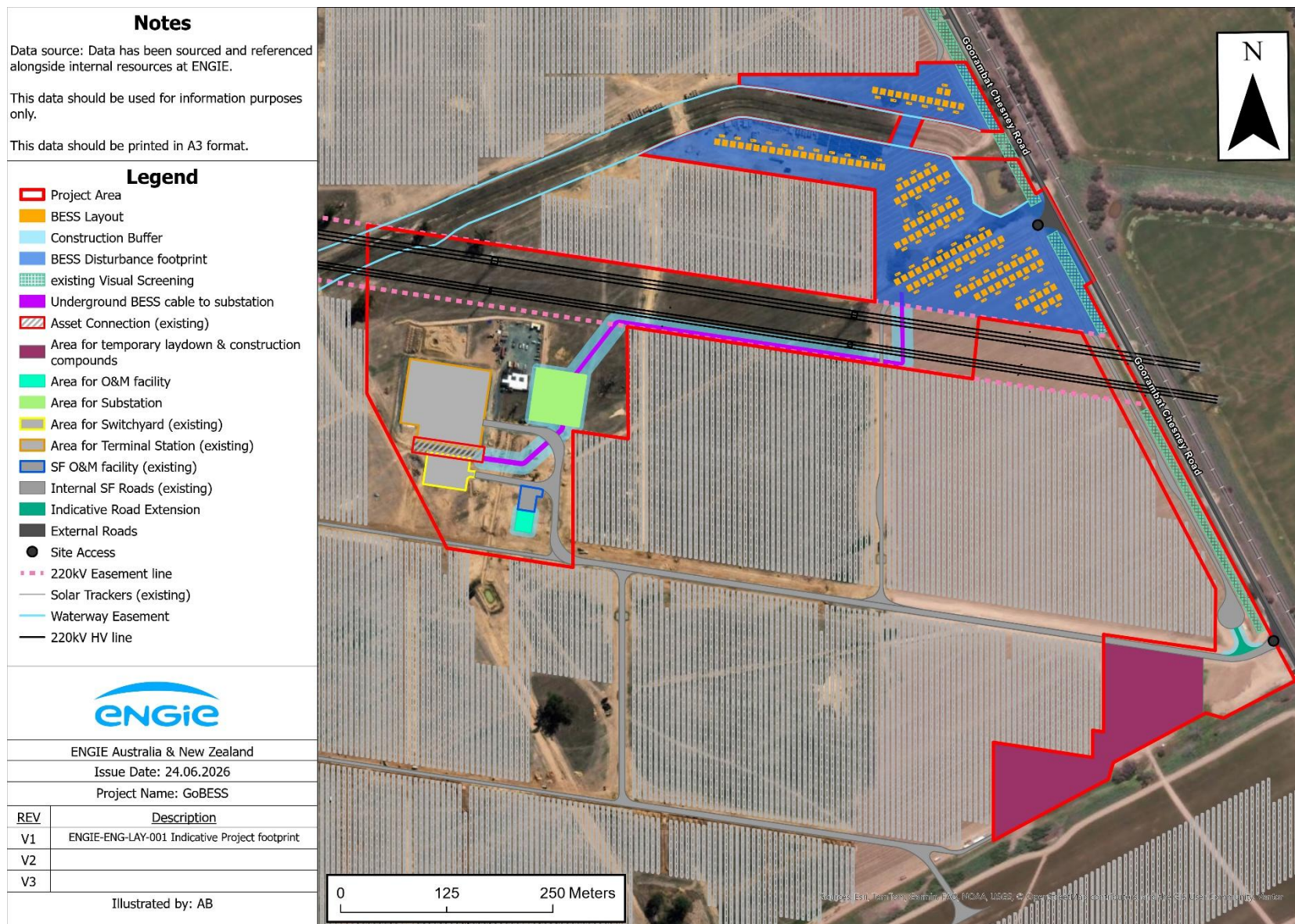


FIGURE 3-1 CONCEPT LAYOUT PLAN

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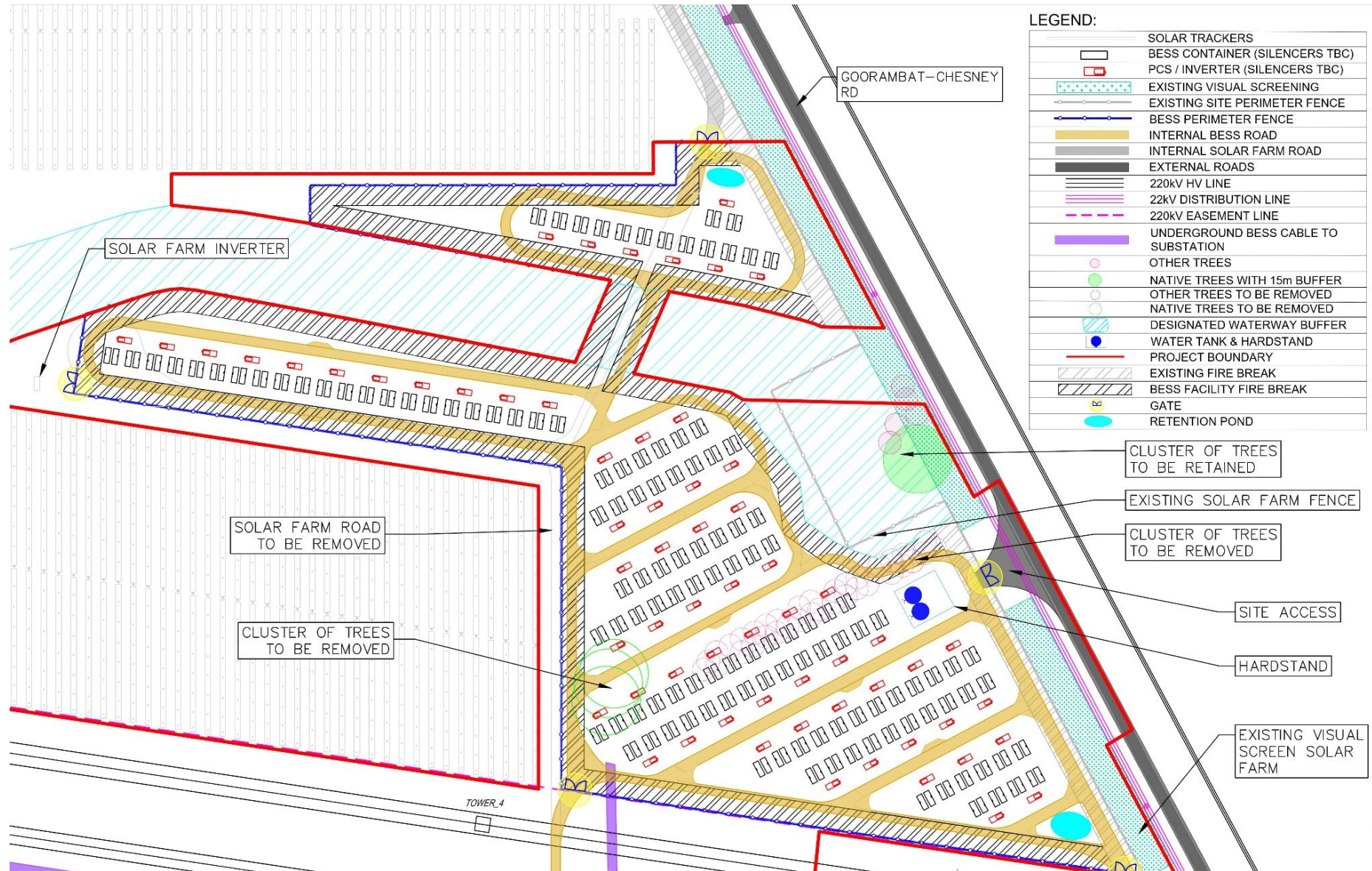


FIGURE 3-2 BESS LAYOUT PLAN

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3.2 LAND USE

The proposal is defined as a 'Utility Installation' under the land use definitions outlined in Clause 73.03 of the Benalla Planning Scheme.

3.3 PROJECT INFRASTRUCTURE

The Project is a 200MW / ~1,200 MWh BESS to be co-located with the GESF. The proposed BESS is designed to:

- Store energy from both the adjacent solar farm and the grid, enabling flexible dispatch.
- Discharge electricity into the grid during peak demand periods, supporting grid reliability and renewable integration.
- Operate with an expected 1–2 full charge/discharge cycles per day, depending on market and grid conditions.
- The BESS will operate 24/7, with automated control systems managing charging and discharging based on grid needs and market signals.

3.4 GRID CONNECTION

The Project is strategically located adjacent to the Dederang Terminal to Shepparton Terminal and Glenrowan Terminal to Shepparton Terminal transmission lines, which traverse the Project and GESF area.

The Project will connect to the GETS (constructed for GESF and soon to be owned and operated by AusNet following transfer of Lot 2 on PS927303N) via an AC-coupled 33 kV interface. The concept envisages a new underground 33 kV cable connection from the BESS collector to GETS, with potential augmentation of the existing GESF point of connection arrangements at GETS to accommodate BESS export, in accordance with the standard National Electricity Rules connection pathways (NER 5.3.4 for the BESS, and NER 5.3.9 to adjust the existing GESF Point of Connection (POC) where applicable). A detailed connection strategy is subject to further detailed design, and will be confirmed with AEMO, VicGrid and AusNet.

3.5 ACCESS AND PARKING

Primary construction and operational access to the site is proposed to be from the creation of a new accessway from Goorambat–Chesney Road. A secondary accessway will be to the southern laydown area, also from Goorambat–Chesney Road, however this has already been constructed as part of the approved GESF. Access design will be confirmed in consultation with Benalla Rural City Council and Department of Transport and Planning (DTP) where the interface with Transport Zone 3 (TRZ3 – Significant Municipal Road) applies. Existing internal GESF access tracks and access will be reused where practical, with some minor adjustments to allow for the Project and associated infrastructure.

The BESS will utilise existing car parking infrastructure developed for the GESF. This parking was originally sized for the GESF construction phase and is oversized for ongoing operational needs, making it suitable for shared use by the BESS during both construction and operational phases.

3.6 EARTHWORKS AND DRAINAGE

Stormwater will be managed through swales, basins and level spreaders to match pre-development flows and maintain water quality, noting the Project footprint avoids the Floodway Overlay or Land Subject to Inundation Overlay. While further detail will be determined through detailed design, more information can be found in Section 6.7.

Earthworks will be minimised by utilising the existing relatively flat topography of the site, with localised cut and fill required for equipment pads, internal access tracks and stormwater controls. Earthworks will be undertaken in accordance with a Construction Environmental Management Plan (CEMP) (Section 3.9.1), and the GBCMA Works on Waterway permit if required.

3.7 VEGETATION REMOVAL AND SCREENING

The Project will result in the removal of 0.211 ha of native vegetation, comprising 0.085 ha of woodland patches (including four Large Patch Trees) and 0.125 ha in the form of three Scattered Trees (one large and two small). All impacted vegetation represents Endangered Plains Woodland (EVC 803) within the Victorian Riverina Bioregion. As the removal is less than 0.5 ha and occurs in Location Category 2, the proposed clearing is subject to the Intermediate Assessment Pathway under Clause 52.17 of the Benalla Planning Scheme. Appropriate efforts have been made to avoid and minimise impacts by locating infrastructure within previously disturbed areas and retaining the majority of native vegetation and scattered trees on-site. Further detail on this can be found in Section 6.1 and Appendix C.

There is already existing landscape screening for the Project, which has been implemented as part of the GESF (refer to the Landscape and Visual Review in Appendix H). This screening is largely located along Goorambat-Chesney Road, with the exception of the transmission easement crossover, which will likely result in the only views to the Project being from a short section of Goorambat-Chesney Road.

3.8 EMPLOYMENT

Although this is indicative only and subject to change through selection of a Balance of Plant (BOP) contractor in the detailed design stage, some indicative employment figures have been provided below.

Construction

- Peak Workforce: ~140–150 personnel
- Average Workforce: ~80–90 personnel

Operation

- On-Site FTE: ~1
- Off-Site FTE: ~1-2

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3.9 CONSTRUCTION, OPERATION AND DECOMMISSIONING

Construction of the Project is anticipated to be completed in one stage. The GESF has already been constructed, and the proposed Project will be built to connect to the GETS.

3.9.1 CONSTRUCTION

Construction of the proposed 200 MW / 1,200 MWh BESS is expected to follow a conventional sequence typical of large-scale electrical infrastructure projects. The works would be managed to ensure safety, environmental protection and minimal disturbance to surrounding land uses. The construction methodology will be refined during detailed design and contractor engagement; however, the key stages are anticipated to include:

- Site establishment – The Project will attempt to utilise as much of the existing GESF facilities where possible, however where necessary the following may be required: installation of temporary facilities including site offices, amenities, laydown and storage areas, access tracks, fencing, and erosion- and sediment-control measures;
- Civil works – site preparation, earthworks and grading to achieve suitable ground levels, drainage installation, and construction of equipment pads or foundations;
- Electrical and mechanical installation – delivery and placement of battery enclosures or containers, inverters, transformers, and associated balance-of-plant infrastructure. This may include underground and above-ground cabling, switchgear, and communications systems;
- Grid connection works – construction or modification of the connection to the existing electricity network (at 220 kV or 33 kV) or integrating with the existing solar farm infrastructure, utilising shared electrical assets where appropriate, whilst coordinating with the AusNet;
- Commissioning – staged energisation and functional testing of electrical systems to verify compliance with grid and safety requirements; and
- Demobilisation and rehabilitation – removal of temporary facilities and reinstatement of disturbed areas, including re-establishment of groundcover and surface drainage.

Construction activities are expected to occur over a period of approximately 12–18 months followed by the commissioning of the Project, subject to weather conditions, final design and procurement schedules. Construction hours would generally align with standard working hours, generally in accordance with EPA Publication 1834.2 daytime construction hours, with any out-of-hours work to be managed in accordance with future relevant approvals, if required. All works would be undertaken in accordance with a CEMP that addresses environmental controls, traffic management, noise and dust mitigation and waste handling, consistent with applicable Victorian regulatory and industry requirements.

3.9.2 OPERATION

The BESS will be operated and maintained in accordance with industry best practices and relevant regulatory requirements to ensure safe, reliable, and efficient performance over its operational life.

Operations Overview

The BESS will be remotely monitored and controlled via a central operations centre, which will oversee energy dispatch, system performance, and safety. The system will respond to market signals and grid requirements, including instructions from relevant authorities such as the AEMO and the local network service provider. Operational control includes the ability to start, stop, and isolate the system as needed to maintain safety and compliance.

Maintenance Activities

Maintenance of the BESS will be carried out through a combination of scheduled and responsive activities. These include:

- Preventive Maintenance: Regular inspections, testing, and servicing of equipment to ensure optimal performance and reduce the risk of faults;
- Corrective Maintenance: Timely response to any faults or performance issues to restore normal operation; and
- Site Maintenance: General upkeep of site infrastructure, including vegetation management, fire safety systems, and facility maintenance.

During the initial years of operation, maintenance will be performed by specialist contractors under long-term service agreements. These contractors will be responsible for both the battery system and associated balance of plant infrastructure. Over time, operational responsibilities may transition to internal teams, depending on Project needs and resource availability.

3.9.3 DECOMMISSIONING

At the end of the operational life of the proposed 200 MW / 1,200 MWh BESS, the facility will be decommissioned in a safe, orderly and environmentally responsible manner.

Decommissioning works are expected to be generally comparable in scale and nature to construction activities but will focus on the removal rather than installation of infrastructure.

Indicative decommissioning activities may include:

- Electrical isolation and disconnection – safe de-energisation and disconnection of the BESS and associated electrical infrastructure from the grid, undertaken in consultation with AusNet and the AEMO as required;
- Removal of infrastructure – dismantling and removal of above-ground components such as battery enclosures or containers, inverters, transformers, switchgear, cabling, and ancillary structures;
- Material recovery and recycling – recovery of reusable materials and recycling or disposal of components (including battery modules) in accordance with prevailing regulations, industry standards and available recycling technologies at the time of decommissioning;
- Site rehabilitation – removal of foundations where practicable, regrading and reinstatement of disturbed areas, and re-establishment of groundcover to achieve a stable and safe post-operational condition consistent with the surrounding land use or landowner preferences; and
- Environmental and safety management – implementation of controls to manage noise, dust, waste, and potential contamination risks during decommissioning, consistent with applicable Victorian environmental and occupational health and safety requirements.

While full decommissioning is anticipated at the end of the operational life, the option to undertake a repowering or equipment replacement program may be considered at that time.

Such an initiative would be subject to separate assessment and approvals. A detailed Decommissioning and Rehabilitation Plan would be prepared closer to the end of the facility's operational life, in consultation with relevant authorities, to reflect current standards, legislation and best practice at that time.

3.10 DESIGN EVOLUTION

The Project has evolved through a structured design process informed by site characteristics, technical assessments, and engagement with regulators and the community. The current indicative layout reflects the outcome of this iterative process to ensure the siting and layout respond appropriately to site constraints and environmental sensitivities. Further refinement will continue through detailed design, subject to planning approval, permit conditions, contractor engagement, further community and regulator engagement and final equipment selection.

3.10.1 STRATEGIC SITING: CO-LOCATION WITH THE GESF

The strategic decision of co-locating a BESS within the GESF was made early in the development process and is the foundation of the design. Co-location delivers significant benefits compared with a standalone BESS, including:

- Operational benefit where storage is most effective in reducing curtailment of nearby solar and wind generation and supporting system strength;
- Use of the existing GETS, removing the need for a new terminal station and associated new transmission infrastructure;
- Re-use of land already disturbed by the GESF, avoiding the need to clear or convert additional agricultural land;
- Re-use of GESF infrastructure where practical, including internal access tracks, the southern accessway, the construction laydown area, the operations and maintenance car parking, and security and lighting infrastructure reducing the Project impacts; and
- Continuity of established stakeholder relationships with adjoining landholders, Benalla Rural City Council, the Country Fire Authority, the GBCMA, AusNet and YYNAC.

3.10.2 SITE SELECTION WITHIN THE GESF LAND HOLDING

Within the GESF land holding, 6 candidate sites were assessed in late 2025 (Figure 3-3). Each site was evaluated against a consistent set of planning, environmental, engineering and constructability criteria, comprising:

- Proximity to the GETS and the length of 33 kV underground cabling required;
- Quality of access to and the ability to re-use the existing GESF accessway;
- Native vegetation and the ability to avoid impacts to Large Trees and higher value patches;
- Proximity to noise sensitive receivers and the ability to achieve compliance with the EPA Publication 1826.5 Noise Protocol limits;
- Flood behaviour, including hazard areas, and the ability to maintain the GBCMA designated waterway 15 m buffer agreed for the GESF;
- The ability to remain outside areas of Cultural Heritage Sensitivity;
- Visual impacts to the surrounding area and compatibility with the existing screening for the GESF;
- Fire risk and the ability to comply with the relevant CFA guidelines for BESS;
- Constructability, including topography, ground conditions and proximity to the existing GESF construction laydown area; and
- The ability to coexist with the existing 220 kV transmission easements.

Option 3 was selected as the preferred option as it best balances these criteria:

- Closest to the GETS, minimising the length of new 33 kV underground cabling and reducing the extent of cable trenching across the site;
- Re-uses the existing GESF accessway from Goorambat–Chesney Road, with a single new dedicated accessway required;
- Sits partly on previously disturbed land within the GESF, minimising additional native vegetation impacts;
- Sits outside the GBCMA designated waterway 15 m buffer and mostly outside the higher flood hazard areas;
- Provides sufficient setback from the nearest noise sensitive receivers;
- Remains outside areas of Cultural Heritage Sensitivity;
- Has limited visibility, restricted to a short section of Goorambat–Chesney Road; and
- Is immediately adjacent to an existing GESF construction laydown area.

Following site selection, the layout within Site 3 has been refined through multiple iterations in response to the findings of the supporting technical assessments and stakeholder engagement. The current indicative layout (Figure 3-1 and Figure 3-2) reflects the cumulative outcome of these refinements. Equipment selection, final BESS unit sizing and quantity, internal road and cable routing, fencing and landscape detail will be confirmed at detailed design once the BOP contractor and the BESS Original Equipment Manufacturer (OEM) have been selected. Any change at detailed design that would result in new or additional impacts beyond those assessed in this Planning Report and the supporting technical assessments will be subject to further assessment in accordance with permit conditions.



FIGURE 3-3 BESS SITE OPTIONS

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4. PLANNING ASSESSMENT

4.1 STRATEGIC CONTEXT

4.1.1 PLAN FOR VICTORIA

Plan for Victoria is the State's overarching strategic policy that sets out the guiding principles for development in the State.

The plan is structured around five key pillars. These include:

- Pillar 1 - Housing for all Victorians;
- Pillar 2 - Accessible jobs and services;
- Pillar 3 - Greater Places, suburbs and towns;
- Pillar 4 - Sustainable environments; and
- Pillar 5 - Self-determination and caring for Country.

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The Sustainable Environments pillar sets out the State's vision for transitioning to renewable energy as part of Victoria's pathway to net zero emissions, including a reduction in reliance on fossil fuels. The plan recognises that regional Victorian communities are well placed to host and benefit from renewable energy infrastructure investment, including battery energy storage projects, and seeks to enable the delivery of affordable, reliable and clean energy in appropriate locations to support businesses and communities.

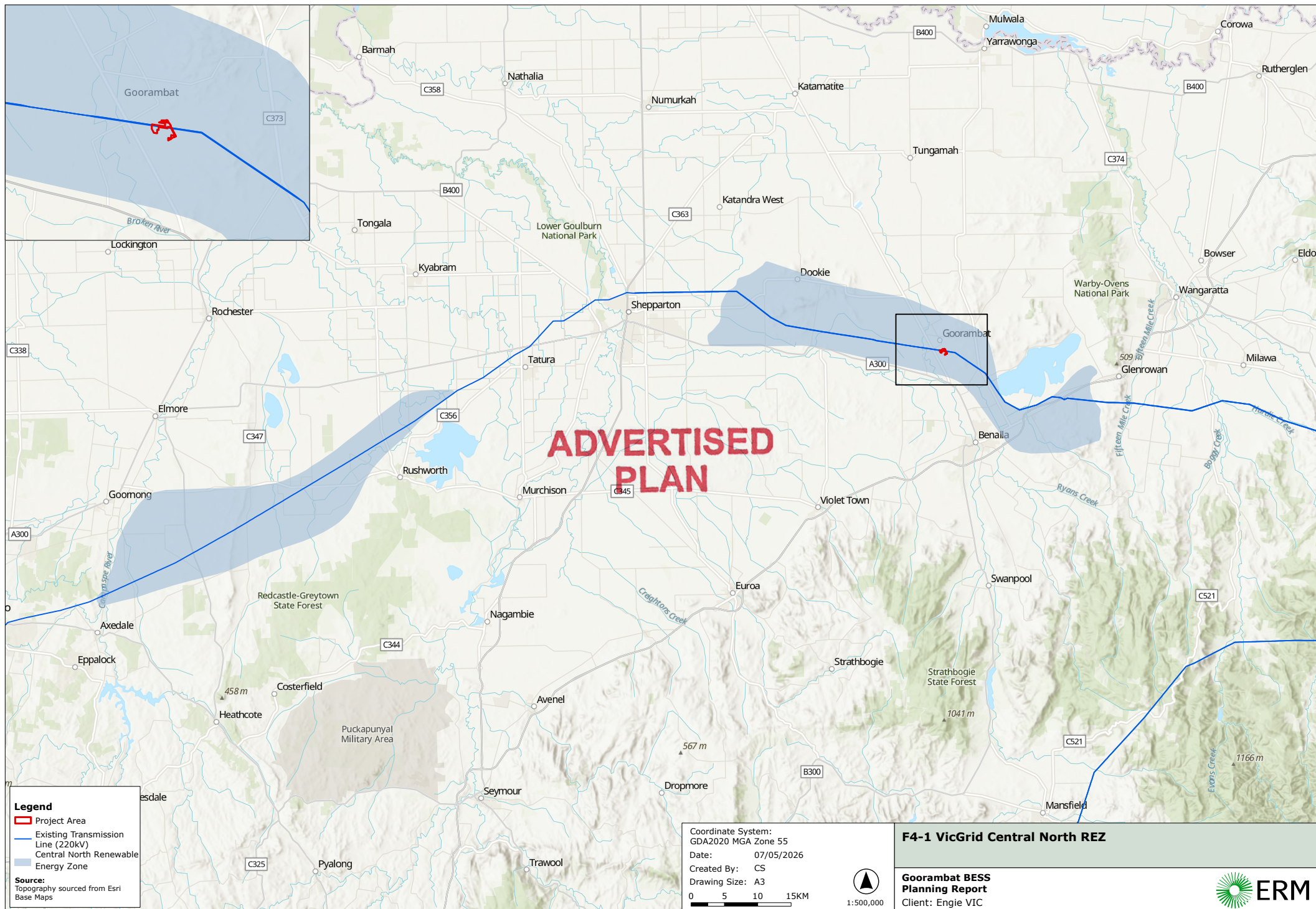
4.1.2 VICTORIAN TRANSMISSION PLAN

In August 2025, VicGrid released the 2025 Victorian Transmission Plan (VTP), a strategic plan for renewable energy infrastructure in the State, to deliver better outcomes for Victorian consumers and communities.

The VTP outlines the allocated REZ across Victoria, as well as investment in new transmission infrastructure. The REZ are identified as the most suitable areas to host new renewable energy generation, and energy storage to support the planned transmission network. In relation to specifically energy storage, the VTP seeks to deliver an additional 4.8 to 7.7 GW of battery energy storage to build storage capacity and resilience across Victoria's future and existing renewables network. The VTP also recognises agriculture's contribution to Victoria's economy and has considered the REZ in areas where typical farming practices have potential to co-exist with renewable projects.

The Project is located within the proposed Central North REZ, which according to the VTP has been designed in response to feedback from the community regarding the potential impacts on biodiversity and farmland in the region. It is acknowledged that agriculture is important to the regional economy, and the proposed REZ avoids the most highly productive areas of the Goulburn Murray Irrigation District.

As of May 2026, the Minister for Energy and Resources declared five of the six proposed onshore REZ and the Gippsland Shoreline REZ. The Central North REZ was not one of the declared zones and will be subject to further consultation with the community, industry and Traditional Owners. Although this zone remains an area of interest for future renewable energy development, as VicGrid prepares for the 2027 Victorian Transmission Plan, they will continue to consider feedback before the Central North REZ can be formally declared.



4.1.3 HUME REGIONAL GROWTH PLAN

The Hume Regional Growth Plan provides a regional approach to land use planning in the Hume Region, which includes the municipalities of Alpine, Benalla, Greater Shepparton, Indigo, Mansfield, Mitchell, Moira, Murrindindi, Strathbogie, Towong, Wangaratta and Wodonga. The plan identifies opportunities to encourage and accommodate growth and to manage change in the region over the next 30 years, building on the directions of the Hume Strategy for Sustainable Communities 2010–2020. The vision for the plan is that *“the Hume Region will be resilient, diverse and thriving. It will capitalise on the strengths and competitive advantages of the four sub-regions, to harness growth for the benefit of the region and to develop liveable and sustainable communities.”*

Section 11.2 (Agriculture) details the strategy for agriculture in the region, as one of Australia’s major food-producing regions. While maintaining and enhancing the contribution to the production of diverse agricultural commodities is a key component of the region’s economic future, it is also acknowledged that decline in certain types of agricultural land use has changed over time due to policy or demand. One objective is to ‘Support changing farm sizes, methods, strategies and land uses’, where some areas used by industries in decline could transition to other land uses such as forestry, renewable energy generation, carbon farming and conservation activities.

Section 11.3 (Energy and earth resources), includes an objective to ‘explore opportunities for renewable energy generation and alternative waste treatment.’ This objective states that key electricity infrastructure such as substations and transmission networks are located in the Hume region, and this connection could provide opportunities to the region to locate renewable energy infrastructure, supporting the location of renewable energy hubs in Shepparton, Wodonga, Wangaratta, Benalla and Seymour, co-located with industry to maximise resource use efficiency in the region.

The Project aligns with the Hume Regional Growth Plan by supporting renewable energy and making use of existing electricity infrastructure in the region. The Project:

- Supports renewable energy by providing large-scale storage that helps integrate renewables and improve grid reliability;
- Builds on existing electricity assets by co-locating with the approved GESF and connecting via the GETS;
- Supports local jobs and investment during construction and operation; and
- Is located on cleared agricultural land and limits new disturbance by utilising land within the GESF boundary, including repurposing GESF internal access and laydown area.

4.2 PLANNING POLICY

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4.2.1 RESPONSIBLE AUTHORITY

The Responsible Authority for the administration and enforcement of the Planning Scheme or provision of the Planning Scheme is specified in Clause 72.01-1.

Under Clause 72.01-1 of the Benalla Planning Scheme, the Minister for Planning is the Responsible Authority for matters arising under Divisions 1, 1A, 2 and 3 of Part 4 of the *Planning and Environment Act 1987*. This includes any endorsement, approval or satisfaction required by a permit or the scheme, where the land is used or developed for:

- A utility installation used to transmit or distribute electricity; or
- Use or development to which Clause 53.22 (Significant Economic Development) applies.

4.2.2 DEVELOPMENT FACILITATION PROGRAM

As the proposal seeks to develop land that includes a utility installation used to “*transmit or distribute electricity; or store electricity if the installed capacity is 1 megawatt or greater*”, pursuant to Clause 53.22-1, the application is eligible to be assessed under the Development Facilitation Program (DFP) in accordance with Clause 53.22 Significant Economic Development of the Benalla Planning Scheme.

4.2.3 PLANNING POLICY FRAMEWORK

The Planning Policy Framework (PPF) seeks to ensure that the objectives of planning in Victoria (as set out in Section 4 of the P&E Act) are fostered through appropriate land use and development policies and practices. The PPF informs the preparation and implementation of local planning policy objectives and the introduction of zone and overlay controls, and seeks to integrate relevant environmental, cultural, social and economic factors in the interest of net community benefit and sustainable development. Those clauses most relevant to the current proposal include:

TABLE 4-1 RELEVANT PLANNING POLICIES ASSESSMENT

Clause	Objective	Assessment
12.01-1S Protection of biodiversity 12.01-2S Native vegetation Management	To protect and enhance Victoria’s biodiversity. To ensure that there is no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation.	An ecological assessment undertaken by ERM confirms that the Project avoids areas of significant native vegetation and fauna habitat. There are few biodiversity values associated with the Project Area, which is largely confined to previously modified agricultural land. Refer to Appendix C and Section 6.1 for further details.
12.03-1S River and riparian corridors, waterways, lakes, wetlands and billabongs	To protect and enhance waterway systems including river and riparian corridors, waterways, lakes, wetlands and billabongs, applying to land within 200 m from the centreline of a waterway.	The Project is adjacent to a designated waterway, which in engagement with Goulburn Broken Catchment Management Authority (GBCMA), has agreed to a reduced buffer of 15 m either side of the waterway, in line with that which was previously agreed for the GESF. Refer to Appendix I and Section 6.7 for further details.
Clause 12.05-2S Landscapes	Protect and enhance significant natural landscapes so development does not undermine their natural qualities. Strengthen landscape quality, open-space connections and environmental performance in key areas (such as green wedges, conservation areas and	The Project is located in flat, modified agricultural landscape, and does not impact any significant natural landscapes. As outlined in the Landscape and Visual Review undertaken by Landform Architects, the Project is proposed to be located

Clause	Objective	Assessment
	non-urban land), recognising the landscape as both an aesthetic asset and a functioning natural system.	within the existing GESF, set back from public road frontages and is not prominent within the existing setting. Refer to Appendix H and Section 6.6 for further details.
Clause 13.02-1S Bushfire Planning	To strengthen the resilience of settlements and communities to bushfire through risk-based planning that prioritises the protection of human life. ADVERTISED PLAN	The Project is located within a Bushfire Prone Area, like much of Victoria, and has been designed to minimise bushfire risk through appropriate siting, access, and infrastructure design. A Fire Risk Management Plan and Fire Safety Study prepared by Fire Risk Consultants concludes that the Project can comply with the Country Fire Authority's Design Guidelines and Model Requirements for Renewable Energy Facilities (v4.4, 2025) and manage bushfire risk to an acceptable level through appropriate design, access, firefighting water supply and ongoing management measures, without increasing risk to surrounding land or communities. Refer to Appendix G and Section 6.5 for further details.
Clause 13.05-1S Noise management	Ensure that development is not prejudiced and community amenity and human health is not adversely impacted by noise emissions.	A Noise Impact Assessment by ERM assessed potential operational noise impacts from the Project against the Noise Protocol noise limits. Applying the equal sharing principle (Publication 1997) to consider the co-located GESF and GETS, the modelling results for the BESS indicate that Project noise levels are compliant with the Project Noise Limits for all assessment periods. Refer to Appendix D and Section 6.2 for further details.
Clause 14.01-1S Protection of Agricultural Land	Identify and assess productive agricultural land (including primary production and intensive agriculture) using state, regional and local context. Prioritise protection of farmland that is strategically significant to the local or regional economy. Avoid the permanent, unplanned loss of productive agricultural land through inappropriate land use change.	The Project utilises land that is surrounded by the GESF and would otherwise be unlikely to continue with agricultural uses. The siting of the Project minimises the loss and fragmentation of productive rural land as it utilises land within the GESF area. A previous Agricultural Assessment for the GESF that included the Project Area determined that the land is classed as 3 or "Average" (on a scale of 1 to 5). Refer to Section 6.8 for further details.

Clause	Objective	Assessment
Clause 14.02-1S Catchment Planning and Management Clause 14.02-1L Catchment planning and management - Benalla	To assist the protection and restoration of catchments, waterways, estuaries, bays, water bodies, groundwater, and the marine environment.	The results of the flood modelling assessment (Appendix I) that undertook hydrology and hydraulic modelling confirms that the Project will not alter local hydrology, and the works do not obstruct major flow pathways or result in adverse hydraulic impacts. Refer to Section 6.7 for further details.
Clause 17.01-1R Diversified economy – Hume	Encourage appropriate new and developing forms of industry, agriculture, tourism and alternative energy production.	The Project is an appropriate use to diversify the regional economy, as the location of the Project and the co-located GESF are within the allocated Central North REZ (VicGrid, 2025), encouraging uses that are compatible with the continuation of agricultural uses in the surrounding area.
19.01-1S Energy supply 19.01-2S Renewable energy 19.01-2R Renewable energy – Hume	To facilitate appropriate development of energy supply infrastructure. To support the provision and use of renewable energy in a manner that ensures appropriate siting and design considerations are met. Create renewable energy hubs that support co-location of industries to maximise resource use efficiency and minimise waste generation.	The development of a BESS contributes towards the Victorian State Government renewable energy goals. The Project will improve grid reliability and in turn provide a secure, reliable and cost-effective energy source to Victoria, particularly due to the Project having a strategic location within the Central North REZ (VicGrid, 2025), and adjacent to the Glenrowan Terminal to Shepparton Terminal and the Dederang Terminal to Shepparton Terminal transmission lines that traverse the Project Area.

4.2.4 ZONES

The Project is located within the Farming Zone, and the accessway via Goorambat-Chesney Road is within the Transport Zone (TRZ3 – Significant Municipal Road). Refer to Figure 4-2.

The proposal to develop a BESS is broadly consistent with the purposes of the FZ and TRZ3 as stated in the Benalla Planning Scheme. The purposes and permit trigger assessment are outlined in Table 4-2 and an evaluation of the proposal against the decision guidelines of Clause 35.07 of the FZ and Clause 36.04 of TRZ3 are provided in Table 4-3.

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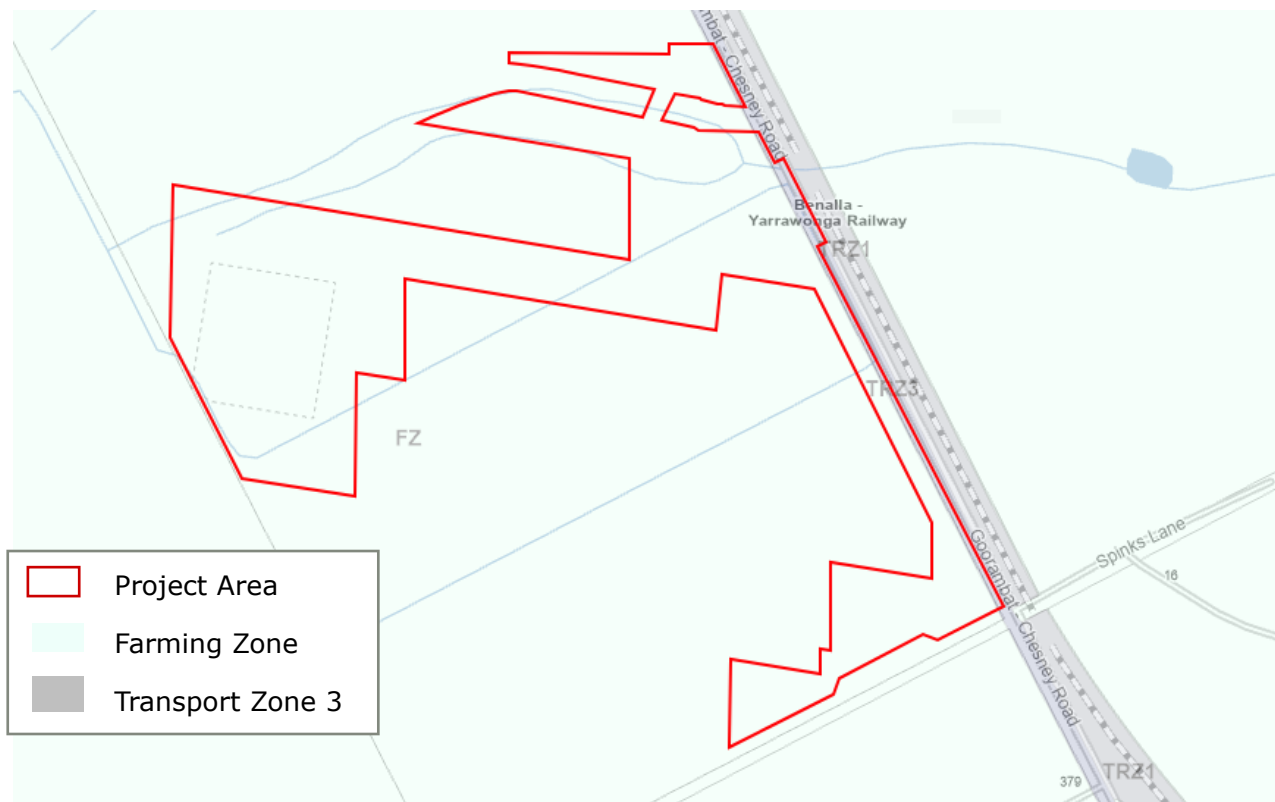


FIGURE 4-2 PROJECT ZONING CONTROLS

TABLE 4-2 ZONING ASSESSMENT

Clause	Relevant purposes	Permit trigger analysis
Clause 35.07 Farming Zone (FZ)	- To implement the Municipal Planning Strategy and the Planning Policy Framework. - To provide for the use of land for agriculture. - To encourage the retention of productive agricultural land. - To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture. - To encourage the retention of employment and population to support rural communities. - To encourage use and development of land based on comprehensive and sustainable land management practices and infrastructure provision. - To provide for the use and development of land for the specific purposes identified in a schedule to this zone.	Pursuant to Clause 35.07-1, a permit is required for use and development of a utility installation, as a Section 2 use, on Farming Zone land. Under Clause 35.07-4 a permit is required for buildings and works associated with a Section 2 Use. In accordance with Clause 35.07-4, a permit is required for buildings with a setback of less than 40 m from a TRZ3 road, as specified in the Schedule to Clause 35.07 Farming Zone. In accordance with Clause 35.07-4, a permit is required for construction of a building within 100 m from a waterway.

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Clause	Relevant purposes	Permit trigger analysis
Clause 36.04 Transport Zone (TRZ3)	- To implement the Municipal Planning Strategy and the Planning Policy Framework. - To provide for an integrated and sustainable transport system. - To identify transport land use and land required for transport services and facilities. - To provide for the use and development of land that complements, or is consistent with, the transport system or public land reservation. - To ensure the efficient and safe use of transport infrastructure and land comprising the transport system. ADVERTISED PLAN	The Project proposes to create access to Goorambat-Chesney Road for the purpose of access to the utility installation use. Pursuant to Clause 36.04-1, a permit is not required for any use of land listed in Clause 62.01 that meets the requirements of Clause 62.01. This includes 'the use of land for a Road, except within the Urban Floodway Zone and a Public Conservation and Resource Zone' and 'the use of land in a road if the use is associated with the use of adjoining land and is authorised by the Council under a local law'. The Project's interface with Goorambat-Chesney Road (including any upgrades or changes to access arrangements within the TRZ3) are detailed in the Traffic Impact Assessment (Section 6.4), and will be refined through detailed design in consultation with Benalla Rural City Council and DTP.

TABLE 4-3 DECISION GUIDELINES FOR APPLICATIONS WITHIN THE FZ AND TRZ3

Decision Making Criteria	Evaluation of Project
<i>Farming Zone</i>	
General Issues - The Municipal Planning Strategy and the Planning Policy Framework. - Any Regional Catchment Strategy and associated plan applying to the land. - The capability of the land to accommodate the proposed use or development, including the disposal of effluent. - How the use or development relates to sustainable land management. - Whether the site is suitable for the use or development and whether the proposal is compatible with adjoining and nearby land uses. - How the use and development makes use of existing infrastructure and services.	The proposed use and development of land for a utility installation is considered compatible with the surrounding land uses which comprise mostly agricultural activities. The Project would have no effects that would limit the operation of adjoining or nearby agricultural uses. At the end of its operational life, the Project may be upgraded or repowered, subject to the relevant land agreements and planning approval requirements. If the Project is not upgraded or repowered, it would be decommissioned in accordance with applicable approvals and regulatory requirements. Decommissioning would generally include the removal of all above ground equipment and restoring the land to its original use.

Decision Making Criteria	Evaluation of Project
Agricultural issues and the impacts from non-agricultural uses • Whether the use or development will support and enhance agricultural production. • Whether the use or development will adversely affect soil quality or permanently remove land from agricultural production. • The potential for the use or development to limit the operation and expansion of adjoining and nearby agricultural uses. • The capacity of the site to sustain the agricultural use. • The agricultural qualities of the land, such as soil quality, access to water and access to rural infrastructure. • Any integrated land management plan prepared for the site. • Whether Rural worker accommodation is necessary having regard to: ◦ The nature and scale of the agricultural use. ◦ The accessibility to residential areas and existing accommodation, and the remoteness of the location. • The duration of the use of the land for Rural worker accommodation.	The proposed use makes use of existing infrastructure and services, being co-located with the GESF, and strategically located to connect to the GETS, enabling connection to the existing 220 kV transmission line that is adjacent to the Project. The Project proposes a non-agricultural use, however, it is co-located with the approved and constructed GESF and GETS. The Project has been designed to minimise impacts on agricultural land and surrounding farming operations, and also allows for these activities to continue in the surrounding area. The Project has a relatively small footprint and utilises land within the GESF area that would likely not be used for agricultural activities otherwise, therefore limiting fragmentation of productive farmland elsewhere. The Project will not alter agricultural qualities of the land such as soil quality or access to water.
Accommodation issues • Whether the dwelling will result in the loss or fragmentation of productive agricultural land. • Whether the dwelling will be adversely affected by agricultural activities on adjacent and nearby land due to dust, noise, odour, use of chemicals and farm machinery, traffic and hours of operation. • Whether the dwelling will adversely affect the operation and expansion of adjoining and nearby agricultural uses. • The potential for the proposal to lead to a concentration or proliferation of dwellings in the area and the impact of this on the use of the land for agriculture.	n/a ADVERTISED PLAN

Decision Making Criteria	Evaluation of Project
- The potential for accommodation to be adversely affected by noise and shadow flicker impacts if it is located within one kilometre from the nearest title boundary of land subject to: - A permit for a wind energy facility; or - An application for a permit for a wind energy facility; or - An incorporated document approving a wind energy facility; or - A proposed wind energy facility for which an action has been taken under section 8(1), 8(2), 8(3) or 8(4) of the <i>Environment Effects Act 1978</i>. - The potential for accommodation to be adversely affected by vehicular traffic, noise, blasting, dust and vibration from an existing or proposed extractive industry operation if it is located within 500 metres from the nearest title boundary of land on which a work authority has been applied for or granted under the <i>Mineral Resources (Sustainable Development) Act 1990</i>.	ADVERTISED PLAN
Environmental issues - The impact of the proposal on the natural physical features and resources of the area, in particular on soil and water quality. - The impact of the use or development on the flora and fauna on the site and its surrounds. - The need to protect and enhance the biodiversity of the area, including the retention of vegetation and faunal habitat and the need to revegetate land including riparian buffers along waterways, gullies, ridgelines, property boundaries and saline discharge and recharge area. - The location of on-site effluent disposal areas to minimise the impact of nutrient loads on waterways and native vegetation.	The Project avoids high value fauna habitats, and with standard construction controls in place, no significant impacts to flora or fauna are expected. While the Project will result in the removal of 0.211 ha of native vegetation, comprising 0.085 ha of woodland patches (including four Large Patch Trees) and 0.125 ha in the form of three Scattered Trees (one large and two small), appropriate efforts have been made to avoid and minimise impacts by locating infrastructure within previously disturbed areas and retaining the majority of native vegetation and scattered trees on-site. Field surveys confirmed that the site provides generally poor-quality habitat, with no threatened flora or fauna recorded during surveys. Development of a sustainable land management plan and effluent disposal are not applicable to the proposal.
Design and siting issues - The need to locate buildings in one area to avoid any adverse impacts on surrounding agricultural uses and to minimise the loss of productive agricultural land. - The impact of the siting, design, height, bulk, colours and materials to be used, on the natural	The Project location has been selected due to its location adjacent to the existing GESF and GETS, as well as the 220 kV transmission line which traverses the Project Area. The Project has been designed to consider appropriate setbacks and is sited within

Decision Making Criteria	Evaluation of Project
environment, major roads, vistas and water features and the measures to be undertaken to minimise any adverse impacts. • The impact on the character and appearance of the area or features of architectural, historic or scientific significance or of natural scenic beauty or importance. • The location and design of existing and proposed infrastructure including roads, gas, water, drainage, telecommunications and sewerage facilities. • Whether the use and development will require traffic management measures. • The need to locate and design buildings used for accommodation to avoid or reduce noise and shadow flicker impacts from the operation of a wind energy facility if it is located within one kilometre from the nearest title boundary of land subject to: ◦ A permit for a wind energy facility; or ◦ An application for a permit for a wind energy facility; or ◦ An incorporated document approving a wind energy facility; or ◦ A proposed wind energy facility for which an action has been taken under section 8(1), 8(2), 8(3) or 8(4) of the <i>Environment Effects Act 1978</i>. • The need to locate and design buildings used for accommodation to avoid or reduce the impact from vehicular traffic, noise, blasting, dust and vibration from an existing or proposed extractive industry operation if it is located within 500 metres from the nearest title boundary of land on which a work authority has been applied for or granted under the <i>Mineral Resources (Sustainable Development) Act 1990</i>.	the existing GESF so that visual impacts are limited. There are no archaeological, historic or other heritage features within the Project Area. The Nearest mapped Aboriginal Cultural Heritage Sensitivity (CHS) relates to Broken Creek, located to the west of the Project. The Project is not located within any overlays that indicate environmental, landscape or historic significance to be protected. The Project utilises infrastructure from the GESF, such as internal roads and the construction laydown area. ADVERTISED PLAN
<i>Transport Zone 3 – Significant Municipal Road</i>	
Before deciding on an application, in addition to the decision guidelines in Clause 65, the responsible authority must consider, as appropriate: • The Municipal Planning Strategy and the Planning Policy Framework. • The effect of the proposal on the development, operation and safety of the transport system.	The Project will not adversely affect the development, operation or safety of the transport system. The Project proposes access via Goorambat-Chesney Road, providing a safe and efficient connection for construction vehicles. Traffic during operation will be minimal and limited to periodic maintenance. A Traffic Management Plan will be implemented to manage vehicle

Decision Making Criteria	Evaluation of Project
Whether the development is appropriately located and designed, including in accordance with any relevant use, design or siting guidelines.	movements during the construction phase. The layout of the Project has been designed to ensure safe access and movement within the Project Area.

4.2.5 OVERLAYS

There are no overlays in the Project Area.

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4.2.6 BUSHFIRE PRONE AREA

The Project Area, like much of Victoria, is located within a designated BPA. The proposed BESS land use is not a listed land use in Clause 13.02 of the Benalla Planning Scheme. However, it is anticipated that a Fire Management Plan and Emergency Management Plan will be prepared prior to development of the Project as a condition of planning permit.

A Fire Risk Management Plan and a Fire Safety Study have been developed in accordance with the CFA's *Design Guidelines and Model Requirements for Renewable Energy Facilities* (v4.4, 2025), and *Fire Safety Studies for Battery Energy Storage Systems Guidelines* (v1, June 2025), to assess initial fire risks and safety of the Project. The assessment determined that fire risk can be managed to an acceptable level through a combination of design, infrastructure and operational controls. Further detail can be found in Section 6.5 and Appendix G.

4.2.7 PARTICULAR PROVISIONS

The particular provisions are specific prerequisites or planning provisions for a range of particular uses and developments and apply consistently across the state. Unless specified otherwise, the particular provisions apply in addition to the requirements of a zone or overlay.

TABLE 4-4 PARTICULAR PROVISIONS

Clause	Purpose	Permit trigger analysis
Clause 52.05 Signs	- To regulate the development of land for signs and associated structures. - To ensure signs are compatible with the amenity and visual appearance of an area, including the existing or desired future character. - To ensure signs do not contribute to excessive visual clutter or visual disorder. - To ensure that signs do not cause loss of amenity or adversely affect the natural or built environment or the safety, appearance or efficiency of a road.	A permit is required for the display of business identification sign. The Farming Zone is in Category 4 – Sensitive Areas, where pursuant to Clause 52.05-14, business identification signage up to an area of 3 sqm at a single premises is a Section 2 (permit required) sign type.

Clause	Purpose	Permit trigger analysis
Clause 52.06 Car Parking	- To ensure that car parking is provided in accordance with the Municipal Planning Strategy and the Planning Policy Framework. - To ensure the provision of an appropriate number of car parking spaces having regard to the demand likely to be generated, the activities on the land and the nature of the locality. - To support sustainable transport alternatives to the motor car. - To promote the efficient use of car parking spaces through the consolidation of car parking facilities. - To ensure that car parking does not adversely affect the amenity of the locality. - To ensure that the design and location of car parking is of a high standard, creates a safe environment for users and enables easy and efficient use.	A planning permit is not required under the Benalla Planning Scheme, and Clause 52.06, as car parking provided as part of the GESF will be sufficient for construction and operations of this Project. Car parking requirements will be confirmed during the detailed design phase of the Project and will comply with the dimensions required under Clause 52.06-9 of the Benalla Planning Scheme. As the Planning Scheme does not specify a car parking rate for the utility installation land use, the number of spaces will be determined based on the expected peak construction workforce and to the satisfaction of the Responsible Authority, in accordance with Clause 52.06.
Clause 52.17 Native Vegetation Removal	To ensure that there is no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation. This is achieved by applying the following three step approach in accordance with the Guidelines for the removal, destruction or lopping of native vegetation (Department of Energy, Environment and Climate Action, 2025) (the Guidelines).	A permit is required for the removal of native vegetation. The Project will result in the removal of 0.211 ha of native vegetation, comprising 0.085 ha of woodland patches (including four Large Patch Trees) and 0.125 ha in the form of three Scattered Trees (one large and two small). All impacted vegetation represents Endangered Plains Woodland (EVC 803) within the Victorian Riverina Bioregion. As the removal is less than 0.5 ha and occurs in Location Category 2, the proposed clearing is subject to the Intermediate Assessment Pathway under Clause 52.17 of the Benalla Planning Scheme. Appropriate efforts have been made to avoid and minimise impacts by locating infrastructure within previously disturbed areas and retaining the majority of native vegetation and scattered trees on-site.
Clause 53.22 Significant Economic Development	To prioritise and facilitate the planning, assessment and delivery of projects that will make a significant contribution to Victoria's economy and provide substantial public benefit, including jobs for Victorians.	This Project is classified as a Category 1 application under Clause 53.22 of the Benalla Planning Scheme. The Category 1 conditions outlined in Table 1 (Clause 53.22-1) state the application must be for a use specified in Table 2.

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Clause	Purpose	Permit trigger analysis
	To provide for the efficient and effective use of land and facilitate use and development with high quality urban design, architecture and landscape architecture. ADVERTISED PLAN	The Category 1 condition to provide information demonstrating the feasibility of the proposed development to the satisfaction of the Minister for Planning is not required for an application for the use or development of land for a utility installation. The Project is for the use and development of a 'utility installation (other than a data centre)', and meets the specified conditions for Table 2, whereby the Project will: Store electricity if the installed capacity of 1 megawatt or greater. Additionally, this application is made under Clause 53.22, exempting the application from the decision requirements of sections 64(1), (2) and (3), and the review rights of section 82(1) of the P&E Act.

4.2.8 OTHER RELEVANT LEGISLATION

Other relevant legislation and any implications for the proposal is summarised in Table 4-5.

TABLE 4-5 OTHER RELEVANT LEGISLATION

Legislation/Policy	Objective	Goorambat East BESS
Commonwealth		
<i>Climate Change Act 2022</i>	Legislates national emissions reduction targets: 43% below 2005 levels by 2030 and net zero by 2050.	The proposed Project will directly contribute to enabling the State's energy transition and renewable energy targets.
<i>AEMO Integrated System Plan 2024</i>	A roadmap for the transition of the National Electricity Market (NEM) power system, planning for essential infrastructure that will meet future energy needs.	The proposed Project will support the operations of the GESF, and connect to the NEM via the GETS, contributing to grid stability and management.
<i>Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)</i>	Environmental law that provides environmental protection in relation to Matters of National Environmental Significance (MNES).	The proposed Project does not directly impact the biodiversity values identified in the Study Area, and with appropriate mitigation measures implemented in construction and post-construction phases, significant impacts to MNES are considered unlikely. No potentially significant impacts were found to be likely to result from the Project. Further detail is provided in Appendix C.

Legislation/Policy	Objective	Goorambat East BESS
State		
<i>Aboriginal Heritage Act 2006 (AH Act) / Aboriginal Heritage Regulations 2018</i>	Aboriginal cultural heritage is primarily protected by the AH Act and the <i>Aboriginal Heritage Regulations 2018</i> . Under this legislation, Aboriginal cultural heritage is protected by requiring planning permit applicants to prepare a CHMP if and when their proposed actions pose a risk to Aboriginal cultural heritage. Under the AH Act actions are considered to pose a risk to Aboriginal cultural heritage, and therefore require the preparation of a mandatory CHMP, when they are both a “high impact activity” and occur in an “area of cultural heritage sensitivity”.	The proposed Project has been intentionally designed and sited outside any areas of CHS. Therefore, the Project does not trigger a requirement for a mandatory CHMP requirement. As per the GESF, the Proponent has decided to progress without a CHMP, as the Project Area sits within the GESF area. Refer to the Heritage Assessment Letter (Appendix E). ADVERTISED PLAN
<i>Climate Change and Energy Legislation Amendment (Renewable Energy and Storage Targets) Act 2024 (Vic)</i>	Aims to drive Victoria's transition to net-zero by legislating specific renewable energy, energy storage, and offshore wind targets while embedding climate change considerations into land-use planning.	The project supports these objectives by directly contributing to Victoria's legislated renewable energy and storage objectives. The Project will provide up to 200 MW / 1,200 MWh of storage, contributing to Victoria's legislated storage targets of at least 2.6 GW by 2030 and 6.3 GW by 2035, while also improving wider network reliability and grid stability.
<i>Environment Effects Act 1978 (EE Act)</i>	Environmental impact assessment of proposed project works capable of having a significant effect on the environment.	An assessment of the Project against ecological values has been undertaken as part of an Ecological Assessment (Appendix C). No significant effects on ecological values are anticipated, and an Environment Effects Statement is not required.
<i>Environment Protection Act 2017 (EP Act) / Environment Protection Regulations 2021</i>	The EP Act focuses on the general environmental duty (GED) which requires all Victorians to take reasonable and practical steps to reduce the human and environmental health risks of their activities. The <i>Environment Protection Regulations 2021</i> supports the EP Act by setting out specific duties, permissions, and controls for managing waste, noise, air and	A development licence, operating licence, permit or registration is not required under the EP Act. However, the Project will comply with the GED by implementing measures to minimise environmental risks during construction and operation. Waste including soil and any hazardous substances, will be managed in accordance with industry best practice and disposed of via appropriately licenced waste contractors. Waste

Legislation/Policy	Objective	Goorambat East BESS
	water pollution and other environmental risks.	minimisation, reuse and recycling will be prioritised where practicable. A Noise Impact Assessment (Appendix D) was completed in accordance with the Noise Protocol. The Project is predicted to comply with all relevant operational noise limits, consistent with the GED requirements under the EP Act.
<i>Flora and Fauna Guarantee Act 1988 (FFG Act)</i>	Under the FFG Act, a permit is required to take (kill, injure, disturb, or collect) threatened or protected flora species from public land.	No flora, fauna or ecological communities listed as threatened under the FFG Act will be impacted by the Project. A protected flora permit will not be required. The planning application is accompanied by an Ecological Assessment Report (refer to Appendix C) which addresses the requirements in the FFG Act.
<i>Heritage Act 2017</i>	The <i>Heritage Act 2017</i> sets out procedures to identify places of state heritage significance, and of historical archaeological value	The Project Area does not contain any items listed on the Victorian Heritage Register; therefore, no approval is required under <i>Heritage Act 2017</i>. Refer to the Heritage Assessment Letter (Appendix E)
<i>Planning and Environment Act 1987</i>	A framework for urban planning and the use and development of land in the State of Victoria.	The proposed Project is in accordance with the general objectives for planning and land use within Victoria, as it has been selected for its strategic location. A detailed assessment against the relevant provisions of the Benalla Planning Scheme has been provided at Section 4.2.
<i>Road Management Act 2004</i>	To manage the safety and efficiency of public roads to best meet the needs and priorities of State and local communities.	The planning application is accompanied by a Traffic Impact Assessment (refer to Section 6.4), that outlines the proposed strategies for road management. The Proposed Project is consistent with the road management principles outlined in the <i>Road Management Act 2004</i>.
<i>Dangerous Goods Act 1985 / Dangerous Goods (Storage and Handling) Regulations 2012</i>	To ensure that adequate protections are taken against certain fires, explosions, leakages and spillages of dangerous goods, and to ensure the health and safety of workers and the general public is protected.	The Project will involve the storage and management of lithium-ion batteries, which are classified as dangerous goods. All requirements of the dangerous goods legislation would be followed. The planning application is accompanied by a Fire Risk Management Plan and a Fire Safety Study (Appendix G), that assesses the hazards associated with the Proposed Project.

Legislation/Policy	Objective	Goorambat East BESS
<i>Water Act 1989</i>	Provides the legal framework for managing Victoria's water resources. The main purpose of the <i>Water Act 1989</i> is to: promote the equitable and efficient use of water resources; make sure water resources are conserved and properly managed and increase community involvement in conserving and managing water resources.	The Project is not within a waterway and therefore, a Works on Waterways approval will not be required. A buffer of 15 m from the banks of the nearby waterway has been agreed with the GBCMA. For further detail refer to Section 6.7 and Appendix I.

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5. COMMUNITY AND STAKEHOLDER ENGAGEMENT

5.1 PRE-APPLICATION STAKEHOLDER ENGAGEMENT

Ongoing consultation with relevant government authorities, service providers, and stakeholders has been undertaken to inform the Project design and approvals pathway. Key stakeholders engaged with before the planning application was submitted are outlined below.

TABLE 5-1 SUMMARY OF PRE-APPLICATION ENGAGEMENT

Stakeholder	Summary
Energy Assessment Team, DTP	A pre-application meeting was held on 11 February 2026. Ongoing correspondence on application progress and submission readiness.
Benalla Rural City Council	A pre-application meeting was held on 1 September 2025 with Council planning and technical services staff. A project update meeting was held on 25 March 2026 alongside the GESF site visit. There is also ongoing correspondence to provide updates and opportunity to engage further.
Country Fire Authority	A pre-application meeting was held on 4 June 2026 with the CFA Risk and Fire Safety Unit, supported by Fire Risk Consultants, to walk through the draft Fire Risk Management Plan and Fire Safety Study (Appendix G).
Goulburn Broken Catchment Management Authority	Engagement with GBCMA has been ongoing since 2024 for the GESF. GBCMA were engaged with in preparation of the Flood Impact Assessment (Appendix I) and setback requirements from the designated waterway.
Yorta Yorta Nation Aboriginal Corporation (YYNAC)	An introductory meeting was held on 23 April 2026 to present the Project and discuss Yorta Yorta's priorities. YYNAC are seeking continuing engagement with a clear proposal from ENGIE on benefit sharing, work opportunities and procurement formalised through a Memorandum of Understanding (MOU). The Proponent will continue to work closely with YYNAC to formalise an agreement and build an ongoing relationship.
AusNet	Ongoing technical and commercial engagement with AusNet since 2024, covering GESF and GETS. Engagement on connection for the Project ongoing.
VicGrid	The Project is located within the proposed Central North REZ. Engagement with VicGrid has been ongoing since release of the 2025 Victorian Transmission Plan and will continue in the lead up to the release of the 2027 Victorian Transmission Plan.
AEMO	Ongoing engagement on the connection pathway under the National Electricity Rules (NER 5.3.4 and NER 5.3.9).
Adjoining landowners	Landowners have been engaged with both for the GESF and in the lead up to this planning application. Further details can be found in Section 5.2.
Wider community	The wider community have been informed and given the opportunity to provide feedback on the Project. Further details can be found in Section 5.2.

5.2 COMMUNITY CONSULTATION

Community engagement began in August 2025 with neighbouring landholders and expanded to the broader community from February 2026. Activities have included direct outreach, stakeholder briefings, a public drop-in session, community representative meetings, First Nations meeting and a site visit to GESF. These activities were undertaken to raise awareness, gather feedback, and inform project design.

Overall community sentiment has been mixed but constructive, with strong interest in understanding project impacts and ensuring risks are well managed. Key concerns raised include fire risk and emergency response capacity, noise impacts, environmental and water management, and the transparency of the planning process.

There is also a clear expectation that the Project will deliver meaningful and equitable community benefits. A consistent theme across consultation has been the importance of trust, transparency, and ongoing engagement, with community members wanting to see how their feedback influences the design of the Project.

The Proponent has responded to feedback by undertaking additional technical assessments (such as noise and flood modelling), engaging closely with agencies such as the CFA, and incorporating mitigation measures into the project design.

The Proponent is committed to continued engagement throughout planning, construction, and operations, including updates, further community engagement sessions, and collaboration with stakeholders and Traditional Owners.

For further detail on these activities and the feedback received, the Consultation Summary Report can be found in Appendix J.

5.3 COMMUNITY BENEFITS FUND

The Proponent will establish a Community Benefits Fund to deliver long-term, meaningful outcomes for the local community. The Fund will provide a transparent framework for investing in initiatives that align with community priorities and contribute to social, environmental and economic wellbeing.

A core principle of the Fund is co-design. The Proponent will work in partnership with the Goorambat community to collaboratively identify priorities, shape funding criteria and guide decision-making. The value of local knowledge and lived experience is recognised, and intention is the Community Benefit Fund reflects what matters most to the local community.

A dedicated Traditional Owner stream will form part of the Community Benefit Fund, reflecting the Proponent's commitment to a meaningful, long-term relationship with YYNAC, as the Registered Aboriginal Party for the local area.

The co-design of the Community Benefit Fund with the local community will take place after assessment and approval of the planning permit.

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6. ENVIRONMENTAL ASSESSMENT SUMMARY

In support of this permit application, the following potential impacts were assessed to confirm that the proposal is consistent with the Benalla Planning Scheme:

- Ecology;
- Noise;
- Historic and cultural heritage;
- Traffic;
- Fire hazard and risk;
- Visual and landscape;
- Hydrology and flooding; and
- Agricultural.

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A summary of the key findings of the technical assessments prepared in support of this application are provided below.

6.1 ECOLOGY

An Ecological Assessment was prepared by ERM for the proposed Project to identify biodiversity values within the development footprint and assess potential impacts under relevant Victorian and Commonwealth legislation. The ecology Study Area, comprising approximately 30.8 ha of highly modified agricultural land, is dominated by cleared pasture and solar farm infrastructure, with limited and highly disturbed native vegetation present as small patches of Plains Woodland (EVC 803) and scattered Grey Box trees.

Field surveys confirmed that the site provides generally poor-quality habitat, with no threatened flora or fauna recorded during surveys, and only common, widespread bird species observed. While several threatened species have been identified as having the potential to occur in the broader locality, the ecology Study Area does not provide important or high-quality habitat for these species.

The Project will result in the removal of 0.211 ha of native vegetation, comprising 0.085 ha of woodland patches (including four Large Patch Trees) and 0.125 ha in the form of three Scattered Trees (one large and two small). All impacted vegetation represents Endangered Plains Woodland (EVC 803) within the Victorian Riverina Bioregion. As the removal is less than 0.5 ha and occurs in Location Category 2, the proposed clearing is subject to the Intermediate Assessment Pathway under Clause 52.17 of the Benalla Planning Scheme. Appropriate efforts have been made to avoid and minimise impacts by locating infrastructure within previously disturbed areas and retaining the majority of native vegetation and scattered trees on-site.

Native vegetation offsets will be required, with a total offset requirement of 0.049 General Habitat Units with a minimum Strategic Biodiversity Value of 0.3378 and protection of at least five large trees, to be secured within the Goulburn Broken Catchment or Benalla Rural City Council area. Subject to the implementation of recommended mitigation measures, including vegetation protection controls, pre-clearance fauna checks, and appropriate construction management, the Project is not expected to result in significant adverse ecological impacts at the local or regional scale.

The Ecological Assessment can be found in Appendix C.

6.2 NOISE

The Noise Impact Assessment for the proposed Project evaluates potential operational noise impacts at nearby Noise Sensitive Areas (NSAs) in accordance with the *Environment Protection Regulations 2021* and EPA Publication 1826.5 (Noise Protocol).

The assessment applies the equal sharing principle of Publication 1997 to the Noise Protocol noise limits to consider potential cumulative noise impacts from the co-located GESF and GETS, while assessing the Project in isolation. Project Noise Limits were derived for each NSA based on the methodology provided in Publication 1826.5 and Publication 1997 utilising relevant land use zoning information and separation distances and noise levels predicted through noise modelling were compared against these limits.

The modelling results for the BESS indicate that Project noise levels are compliant with the Project Noise Limits for all assessment periods (day, evening and night) at all NSAs. Opportunities for alternative combinations of mitigation strategies that result in equivalent or improved noise impact mitigation performance will be considered in the detailed design phase.

The assessment demonstrates that the Project can meet the General Environmental Duty through appropriate equipment selection, siting and mitigation, with final measures to be confirmed during detailed design, with further assessment recommended to consider the noise contributions of the GESF and GETS at the NSAs.

The Noise Impact Assessment can be found in Appendix D.

6.3 HERITAGE

The Heritage Assessment for the proposed Project found no registered Aboriginal cultural heritage places or historic heritage sites within the Project Area. Reviews of Aboriginal and historic heritage registers, planning scheme heritage overlays, and Commonwealth heritage databases confirmed that the nearest registered sites are several kilometres away. The Project Area has been subject to long-term agricultural use and prior disturbance, substantially reducing the likelihood of intact historic heritage remains.

The Project Area is not located within an area of CHS, and while the development constitutes a high-impact activity under the *Aboriginal Heritage Regulations 2018*, a mandatory CHMP is not triggered. Desktop investigations indicate a low potential for unknown Aboriginal cultural heritage, given the absence of permanent water sources and the highly modified landscape. Notwithstanding this low risk, all Aboriginal heritage is protected under the *Aboriginal Heritage Act 2006*, and it is recommended that an Unexpected Finds Protocol be implemented during construction.

The Heritage Assessment Letter can be found in Appendix E.

6.4 TRAFFIC

The Traffic Impact Assessment prepared by Impact Traffic Engineering evaluates the transport implications of the proposed Project, located within the approved GESF. Site access will be provided via a new access point from Goorambat-Chesney Road, with the surrounding road network comprising Benalla-Tocumwal Road, Goorambat-Thoona Road and Goorambat-Chesney Road. All key roads and intersections have recently been upgraded or are currently accommodating construction traffic associated with the solar farm. The assessment confirms

that appropriate sight distances are available at the site access and nearby intersections, and swept path analysis demonstrates that 26-metre B-double vehicles can safely access the site without the need for additional turning lanes or permanent road upgrades.

During peak construction, the Project is expected to generate up to 212 two-way vehicle movements per day, comparable to or less than traffic generated during the solar farm construction phase, which will have concluded prior to commencement of BESS works. No cumulative traffic impacts are therefore anticipated. Once operational, traffic generation will be minimal and limited to occasional maintenance visits. Subject to the preparation of a detailed Traffic Management Plan and standard road maintenance arrangements during construction, the assessment concludes that the local and arterial road network has sufficient capacity to accommodate the Project and that there are no traffic or transport grounds that would preclude the grant of a planning permit.

The Traffic Impact Assessment can be found in Appendix F.

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6.5 FIRE RISK

A Fire Risk Management Plan (including a Fire Safety Study) has been prepared by Fire Risk Consultants for the proposed Project, to assess and manage potential fire and bushfire risks during construction and operation. The assessment was undertaken in accordance with Clause 13.02 (Bushfire Planning) of the Benalla Planning Scheme and the CFA *Design Guidelines and Model Requirements for Renewable Energy Facilities* (v4.4 2025). The site is located within a designated Bushfire Prone Area but is not affected by the Bushfire Management Overlay and is characterised by predominantly flat, cleared agricultural land with a grassland fuel profile. A landscape-scale assessment identified that the most credible bushfire scenarios relate to grassfires approaching from the north-west or south-west; however, the surrounding fragmented landscape, existing road network and ongoing vegetation management would substantially limit fire intensity and spread.

The FRMP confirms that the proposed Project has been designed to ensure no net increase in fire or bushfire risk to surrounding land, infrastructure or the broader community. Key mitigation measures include minimum 10-metre perimeter fire breaks and asset protection zones, compliant emergency vehicle access and internal road networks, multiple static firefighting water supplies designed to AS2419.1, and advanced fire detection, suppression and explosion mitigation systems within each battery unit. A site-specific Fire Management Plan and Emergency Management Plan will be implemented and maintained for the life of the Project, with ongoing vegetation control, monitoring and liaison with emergency services. Overall, the residual fire risk is assessed as low to moderate and acceptable, confirming the Project is consistent with bushfire planning policy and CFA requirements.

The Fire Risk Management Plan and Fire Safety Study can be found in Appendix G.

6.6 LANDSCAPE AND VISUAL

The Landscape and Visual Impact Review by Landform Architects concludes that the Project would result in limited and low visual impacts. The BESS is co-located within the approved and constructed GESF and would be largely screened by existing infrastructure, vegetation, and approved landscape planting. The assessment was informed by site inspection, photomontages, and a review of the relevant planning controls and endorsed GESF Landscape Screening Management Plan.

Visibility of the BESS would be confined to a short section of Goorambat–Chesney Road, where a break in existing solar panels and vegetation occurs beneath the 220 kV transmission line easement. Views from this location are experienced only briefly by users of the local road, with no roadside stops or fixed vantage points. Where visible, the BESS would be read in the context of the existing solar farm and transmission infrastructure, is comparable in height to existing panels, and maintains a low profile within the landscape, resulting in a low overall visual impact.

From all other assessed locations, including Goorambat township, Benalla–Tocumwal Road, and Goorambat–Thoona Road, the Project would not be visible due to distance, intervening infrastructure, and screening vegetation. The endorsed GESF Landscape Screening Management Plan will further reduce visibility over time as planting matures, resulting in a progressive reduction in already limited views.

The Landscape and Visual Impact Review can be found in Appendix H.

6.7 HYDROLOGY AND FLOODING

A Flood Impact Assessment was undertaken for the proposed Project to assess flood behaviour under existing and developed conditions for the 1% Annual Exceedance Probability (AEP) event, including a future climate change scenario (SSP3-7.0, 2100). Two-dimensional hydraulic modelling confirms that flooding across the site is generally shallow and characterised by low flow velocities, with overland flows dispersing across the site and discharging to Broken Creek.

The proposed BESS has been designed to achieve finished floor levels at least 300 mm above the 1% AEP flood level in accordance with GBCMA requirements. Modelling of the developed scenario demonstrates that the proposal does not obstruct major flow paths or materially alter flood conveyance, with only minor and localised changes in flood depth and velocity. Flood hazard classifications remain unchanged, access and egress routes are maintained within low-hazard categories, and off-site impacts are negligible, limited to minor changes in flood depth of approximately 1–2 mm. Similar outcomes are predicted under the climate change scenario. Overall, the assessment confirms that the proposed Project will not increase flood risk on-site or to surrounding land. Further assessment will be undertaken through detailed design to determine drainage management for the Project.

Engagement was also undertaken with Benalla Rural City Council and GBCMA to confirm retaining the 15 m development buffer from the banks of the designated waterway that runs through the BESS area, which aligns with the previous agreement for the GESF application.

The Flood Impact Assessment can be found in Appendix I.

6.8 AGRICULTURAL

An agricultural assessment was not commissioned for this specific Project, as the Project Area sits within the previously assessed area for the GESF. The Agricultural Assessment prepared by Phillips Agribusiness for the GESF planning application concludes that the subject land (inclusive of the proposed Project Area) is predominantly comprised of Goorambat Plains soils, which are classified as Class 3 (average) agricultural land. The land is best suited to dryland broadacre cropping (cereals and oilseeds) using best-practice minimum tillage systems, with livestock generally limited to opportunistic stubble grazing. While the land is productive under

appropriate management, it is not considered to be of strategic agricultural significance when assessed in a local, regional or state context, particularly when compared with higher-quality irrigated land within the Goulburn Murray Irrigation District. The assessment finds that removal of the land from agricultural production would represent a small proportion of available dryland farming land in the Benalla region and would not result in a material impact on agricultural output.

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7. CONCLUSION

The Goorambat East BESS is an appropriate development that is consistent with the objectives of the *Planning and Environment Act 1987* and the Benalla Planning Scheme, and responds directly to State and regional planning policy supporting renewable energy generation and electricity storage.

The Project is a strategically located utility installation that will provide up to 200 MW of storage capacity (up to 1,200 MWh) to support system reliability, reduce renewable curtailment and strengthen energy security. Its co-location within the approved and constructed Goorambat East Solar Farm and connection via the existing Goorambat East Terminal Station represents an efficient and logical siting outcome, leveraging existing disturbed areas, access and electricity infrastructure and minimising the need for additional off-site works.

The Project is compatible with the purposes and decision guidelines of the Farming Zone, and the interface with Transport Zone 3 (Goorambat–Chesney Road) can be managed through detailed access design and traffic management measures in consultation with the relevant authorities. The development is a low-intensity, non-urban use with a confined footprint, and minimises impacts on agricultural productivity and environmental values.

The supporting technical assessments confirm that potential impacts relating to traffic, bushfire risk, ecology and native vegetation, noise, landscape and visual amenity, flooding and cultural heritage have been appropriately assessed and can be managed to acceptable levels through further design refinement and permit conditions. Overall, the Project will deliver a clear net community benefit by contributing to Victoria's transition to a reliable and resilient energy system and is considered to be in accordance with the relevant planning controls and policies as assessed in this Planning Report.

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8. REFERENCES

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