Heywood BESS

100 Golf Course Road, Heywood

For Atmos Renewables

6 August 2025

cogency

Planning | Engagement | Strategy

Document Details

Heywood BESS

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Revision	Date	Description	Author	Approved
1	24/04/2025	Draft Planning Application	KD, BG	BG
2	13/05/2025	Final Planning Application Report	KD, BG	BG
3	25/06/2025	Updated Planning Application Report	KD	RW
4	1/08/2025	Updated Planning Application Report	KD	BG

We celebrate the physical and spiritual connections between Indigenous people and place expressed through the Birrarung Wilam (Common Ground) art project on the banks of Melbourne's Yarra River.

Acknowledgement of Country

Cogency acknowledges the Traditional Owners and Custodians of the land on which we meet, work and write, the Wurundjeri Woi-wurrung peoples of the Kulin nation, and their connections to land, sea, and community. We pay our respect to their Elders past and present.

Cogency also extends that respect and acknowledges the Traditional Custodians of Heywood, the Gunditjmara. We recognise and respect their cultural heritage, beliefs and continuing connection with the land and waterways. We also recognise the resilience, strength, and pride of the Gunditjmara and First Nations communities and acknowledge that Sovereignty was never ceded.

Executive summary

Atmos Renewables (Atmos) (the Proponent) has engaged Cogency Australia Pty Ltd (Cogency), a planning and engagement firm, to prepare the enclosed planning permit application package to be lodged with the Minister for Planning (the Responsible Authority) for permit approval.

This planning report supports an application for use and development of land for Utility installation (*land used to transmit, distribute or store power*), known as the Heywood battery energy storage system (BESS) (the Proposal), located in Heywood, Victoria. The Heywood BESS has a conceptual capacity up to 300MW / 1,200MWh.

The Site includes multiple parcels of land, including the primary parcel (100 Golf Course Road), with the proposed transmission connection corridor extending south within an existing high-voltage transmission easement through Mount Clay State Forest to reach the Heywood Terminal Station. The Proposal will require the development of approximately 12 hectares of the 18 hectare primary parcel and 0.8 hectares within Mount Clay State Forest transmission easement. Figure 1 presents an overview of the Site. Access to the Site is proposed via Golf Course Road. The Proposal will connect to the National Energy Market (NEM) via a 275kV underground transmission cable to AusNet's Heywood Terminal Station.

The purpose of this planning permit application package is to provide the Responsible Authority and referral authorities with comprehensive detail of the Proposal. This includes detail on the Proponent and project team, design features, potential impacts and mitigations, and compliance with relevant Acts, regulations, plans, land use controls and guidelines, contained primarily within the Glenelg Planning Scheme (Planning Scheme).

The Proposal is considered use for 'Utilities', and is classed as a Section 2 (permit required) use within the Site's three zones: Farming Zone – Schedule 1 (FZ1), Public Conservation and Resource Zone (PCRZ) and Public Use Zone (PUZ1) – Service and Utility. The Proposal and planning permit triggers are summarised in Table 1.

The Proposal requires ancillary infrastructure (substation and associated electrical infrastructure and transmission connection to existing Heywood Terminal Station), and ancillary works, such as new access points and internal tracks, native vegetation removal within the transmission corridor, security fencing, drainage, earthworks and landscaping.

This Site is ideally suited to a BESS and associated infrastructure development, due to the proximity to existing electrical infrastructure, relatively flat topography, minimal existing vegetation and proximity to nearby dwellings.

Table 1 – Site and application summary

Site	
Municipality	Glenelg Shire Council
Primary Parcel	
Address	100 Golf Course Road, Heywood 3304
Title Description	Lot 2/TP020650J
Area	18 ha
Restrictions on title	Electricity transmission easement in favour of SEC of Victoria
Transmission Corridor	
Address	Crown reserve (Mount Clay State Forest) Rifle Range Road (Council-managed road reserve) Heywood Terminal Station (79 Rifle Range Road)
Title Description	Lot 21B-A/PP3278 Lot 29-A/PP3278 Lot 27~A\PP3278
Area	0.8 ha
Restrictions on title	Yes – reservations, Forest Act, Indigenous Land Use Agreement, and mining/mineral rights are noted. This proposal does not contravene any restrictions.
Planning	
Planning Scheme	Glenelg Planning Scheme
Responsible Authority	Minister for Planning (Clause 72.01-1)
Applicable zones	35.07 Farming Zone – Schedule 1 36.03 Public Conservation and Resource Zone 36.01 Public Use Zone 1 – Service and Utility
Applicable overlays	42.01 Environmental Significance Overlay (Schedule 3) 44.06 Bushfire Management Overlay (partial)
Relevant Particular Provisions	52.06 Car Parking 52.17 Native Vegetation 53.02 Bushfire Planning 53.22 Significant Economic Development
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. 36.01-1 Section 2 Use of land for a Utility Installation. 36.01-2 To construct a building or construct or carry out works for a Section 2 Use. 36.03-1 Section 2 Use of land for a Utility Installation. 36.03-2 To construct a building or construct or carry out works. 52.06-6 To provide car parking spaces to the satisfaction of the responsible authority.
Notice and Review	53.22-4 An application under any provision of this planning scheme is exempt from the decision requirements of sections 64(1), (2) and (3), and the review rights of sections 82(1) of the Act.

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Glossary

Abbreviation	Meaning
ABS	Australian Bureau of Statistics
AEMO	Australian Energy Market Operator
AEP	Annual Exceedance Probability
AHD	Australian Height Datum
BESS	Battery Energy Storage System
CEC	Clean Energy Council
CFA	Country Fire Authority
DEECA	Department of Energy, Environment and Climate Action
DTP	Department of Transport and Planning
EPA	Environmental Protection Authority
EPBC Act	Environment Protection and Biodiversity Conservation Act
GMTOAC	Gunditj Mirring Traditional Owners Aboriginal Corporation (the RAP)
HV	High voltage
IAP2	International Association for Public Participation
LGA	Local Government Area
kV	kilovolt
MW	Megawatt
MWh	Megawatt-hour
NEM	National Energy Market (NEM)
O&M	Operations and Maintenance
RAP	Registered Aboriginal Party
REZ	Renewable Energy Zone

1. Introduction

Cogency Australia Pty Ltd (Cogency), on behalf of Atmos Renewables (Atmos) (the Proponent), has prepared this report to accompany a planning permit application for a utility-scale battery energy storage system (BESS) and ancillary infrastructure in Heywood, Victoria herby referred to as the Heywood BESS (the Proposal).

The Proposal has been informed by an extensive community and stakeholder engagement program that to date has involved meetings with the Department of Transport and Planning (DTP), Department of Energy, Environment and Climate Action (DEECA), Glenelg Shire Council, Gunditj Mirring Traditional Owners Aboriginal Corporation (GMTOAC), relevant State agencies, local businesses. Engagement activities have included near neighbours mailouts and an information stall, fact sheets and newspaper advertisements. Additional community and stakeholder engagement will coincide with the planning application process and beyond.

The Proposal is considered to have a strong alignment with the purpose of the relevant zones and overlays, as well as key State, Regional and Local policy within the Glenelg Shire Planning Scheme. Furthermore, it directly supports Federal and Victorian policy objectives in relation to energy storage and emissions reduction.

This report outlines the Proposal, details the site and locality, and provides a detailed planning assessment of the Proposal against the Glenelg Planning Scheme and relevant policy.

1.1 Proposal summary

Site and Project area

The Heywood BESS has a conceptual capacity of up to 300MW / 1200MWh. The Proposal will develop approximately 13 hectares of land and include an onsite substation, grid connection to the Heywood Terminal Station and associated infrastructure. Once operational, the Heywood BESS will provide additional stability for the national electricity market (NEM) and with its energy storage capacity on the grid can support existing and proposed renewable energy generation within Victoria's South-West Renewable Energy Zone (REZ).

The Proposal is located at 100 Golf Course Road, Heywood, within the Glenelg Shire local government area (LGA). The Proposal is split across the primary parcel at 100 Golf Course Road and the transmission corridor comprising of three land parcels in the northwest corner of Mount Clay State Forest and the Heywood Terminal Station. As shown in Figure 1, the Site technically incorporates the large parcel incorporating Mount Clay State Forest. Therefore, a Project Area has been defined more tightly to the proposed development (Figure 2).

The BESS will be wholly located within the primary parcel. The transmission corridor will run south through Mount Clay State Forest to the Heywood Terminal Station. The transmission corridor will be contained within the existing AusNet operated 500kV transmission easement to avoid and mitigate impacts to native vegetation within Mount Clay State Forest.

The primary parcel is a rural-residential and agricultural property zoned Farming Zone – Schedule 1 (FZ1), approximately 4km south-east of Heywood, 2km west of the Heywood Golf Course, on the north-west side of Mount Clay State Forest. An existing high voltage 500kV transmission line (Mortlake to Heywood) crosses north-south through the centre of the primary parcel (Figure 2).

The transmission corridor is located in the north-west corner of Mount Clay State Forest, approximately 4km south-east of Heywood and 2km west of the Heywood Golf Course. The same high voltage 500kV transmission line (Mortlake to Heywood) crosses north-south into the Heywood Terminal Station within a transmission easement in favour of AusNet.

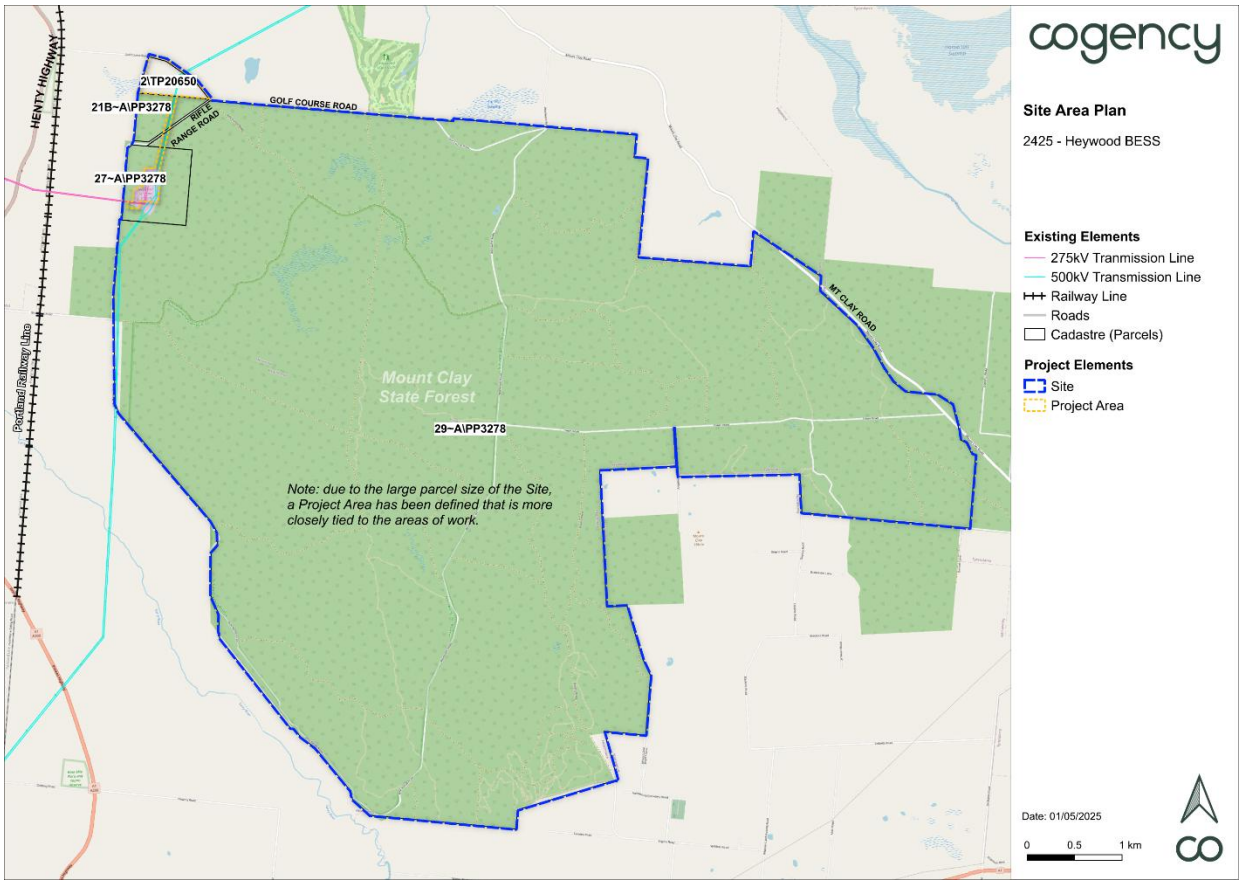


Figure 1 – The Site

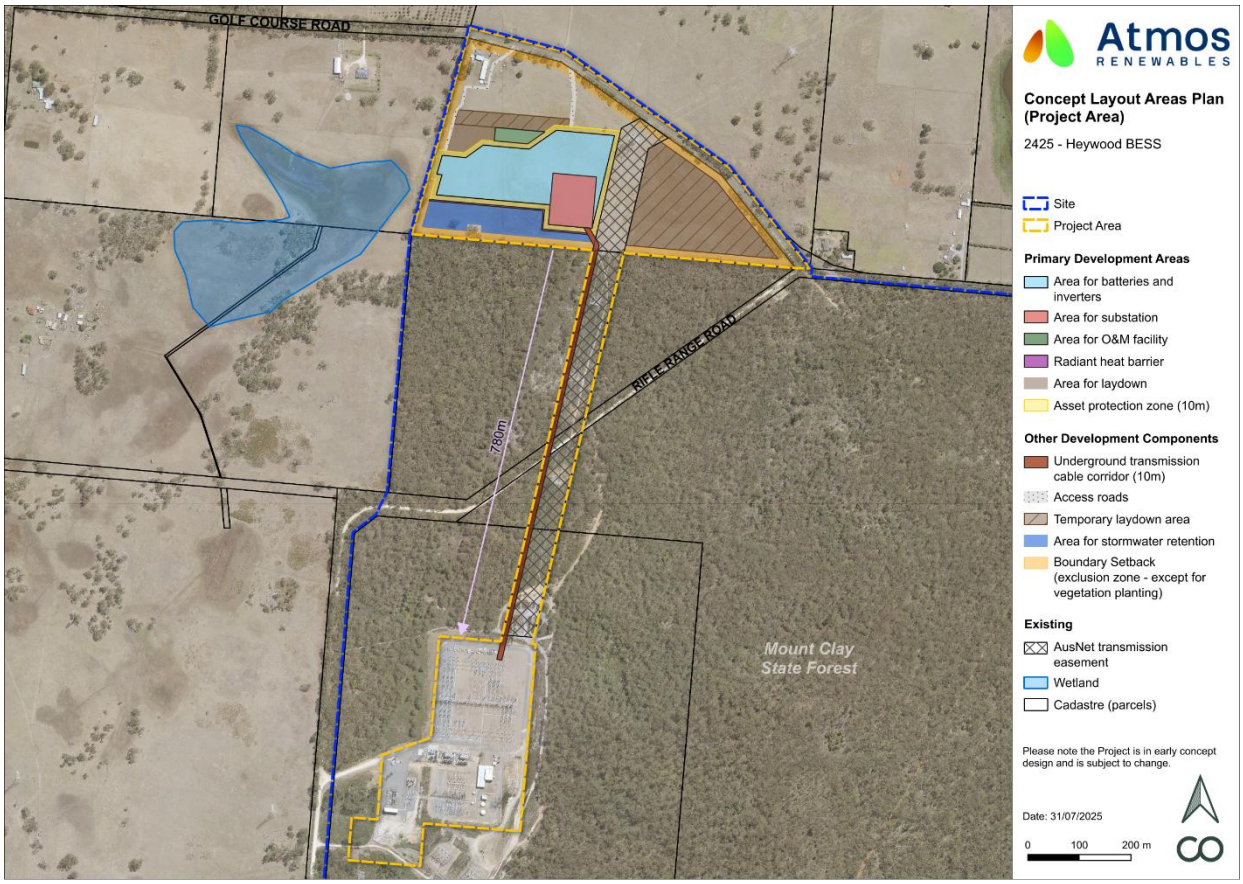


Figure 2 – Project Area Plan

The strategic advantages of the location and Site include:

- Proximity to electrical infrastructure
- The Site is generally level reducing bulk earthworks
- Farming 1 Zone (primary parcel)
- Public Use Zone 1 – Service and Utility (transmission corridor)
- Historic agricultural activities on the primary parcel meaning it contains low biodiversity value
- Large land parcel (primary parcel), allowing the Proposal to be setback from Mount Clay State Forest.
- Located away from residential areas in Heywood.
- Contains an existing cleared transmission easement (transmission corridor).

Planning triggers

The planning permit triggers are:

- Clause 35.07-1 – Use of land for a utility installation (BESS)
- Clause 35.07-4 – Buildings and works associated with a Section 2 Use (BESS)
- Clause 36.01-1 – Use of land for a utility installation (BESS)
- Clause 36.01-2 – Buildings and works associated with a Section 2 Use (BESS)
- Clause 42.01-2 – Removal of native vegetation (transmission corridor)
- Clause 52.06-6 – Car Parking
- Clause 52.17-1 – Removal of native vegetation (transmission corridor).

Project team

A consortium of suitably qualified specialist consultants has been engaged to assess and provide input into the Proposal. Table 2 lists the specialist environmental and technical consultants that have contributed to the Proposal. A range of impact assessments have been prepared to accompany this application (included as appendices) and should be read in conjunction with this Planning Report.

Table 2 – List of project consultants

Proposal consultant	Technical expertise
Cogency	Planning and Engagement
Peter Haack Consulting	Landscape and Visual Impact
SLR	Noise
One Mile Grid	Transport
Fire Risk Consultants	Bushfire risk
EcoLink	Ecology
Dalton Consulting Engineers	Hydrology
Ag-Challenge	Agriculture
GML Heritage	Aboriginal Cultural Heritage

Based on technical impact assessments, the Proposal is not expected to generate any unreasonable or significant environmental or community impacts.

1.2 Traditional Owners

Prior to European Settlement, the Heywood area was stewarded by the Gunditjmara. Gunditj Mirring Traditional Owners Aboriginal Corporation (GMTOAC) is the Registered Aboriginal Party (RAP) representing the Gundijtmara.

One of the most notable aspects of Gunditjmara culture is their sophisticated aquaculture system at nearby Lake Condah and the surrounding area featuring extensive networks of stone channels and weirs to manage eel and fish. The system is one of the world's oldest known aquaculture systems and demonstrates the ingenuity and sustainable practices of the Gunditjmara people. The Budj Bim Cultural Landscape, which includes the aquaculture system has been recognised as a UNESCO World Heritage Site, further acknowledging the importance of local indigenous culture and history.

1.3 The Proponent

Atmos (the Proponent) is a developer, owner, and operator of utility scale renewable energy generators across the Australian NEM. Established in 2020, Atmos is currently the fifth largest owner of operational renewable generation assets in Australia, with over 1 GW of registered capacity. Atmos' mission centres around powering a sustainable future for Australia and building lasting relationships with local communities. The Proponent strives to collaborate with relevant agencies, councils, government departments and other key stakeholders alongside community and First Nations engagement

2. Site & context analysis

2.1 Site context

The Site is located on rural agricultural land and on land in the north-west corner of Mount Clay State Forest in Heywood, within the Glenelg Shire LGA. Portland, Casterton and Heywood are the three largest towns in the Glenelg Shire, approximately 300 kilometres west-southwest of Melbourne. Heywood has a population of 1,815 (ABS 2021) and a high percentage of residents that identify as Aboriginal and/or Torres Strait Islander (6.7%). Heywood is known for its rich indigenous history and natural beauty.

Prior to European settlement, the areas surrounding Heywood had been under continual stewardship and care of the Gunditjmara people for tens of thousands of years. Their connections to the land and environment are reflected to this day by their strong community and the remnant complex aquaculture systems dated to at least 6,000 years old within the Budj Bim Cultural Landscape, a UNESCO World Heritage-listed site, located approximate 20km north-east.

The Site is approximately 4km south-east of Heywood and 18km north of Portland. The Site is located on Golf Course Road, a road that borders the northern edge of Mount Clay State Forest and provides access from Henty Highway to the Heywood Golf Club (2km east). The surrounding area includes rural and agricultural properties, Heywood Bushland Reserve (900m west), Mount Clay State Forest (adjacent), the Portland railway line (850m west) and the Heywood Terminal Station (800m south) (Figure 3).

The 500kV/275kV Heywood Terminal Station is owned and operated by AusNet Transmission Group (AusNet). It is a major terminal station in the Victorian 500kV transmission network and connects to South Australia via a double circuit 275kV line. The Heywood Terminal Station also connects to the Portland aluminium smelter, a large consumer of electricity, via a 500kV line.

Heywood is located within the South West REZ, identified by the Victorian Government as an area with the significant potential for renewable energy, specifically for the coastal region's strong average wind speeds. Over the past two decades the wider Glenelg Shire region has experienced a growth in its renewable energy industry with the area being a key location for existing and proposed renewable energy facilities. Some of Victoria's earliest wind farms were constructed in the area, including the first – Codrington, in 2001. Other existing wind farms in the area include the Yambuk Wind Farm (constructed in 2007), Cape Bridgewater Wind Farm (2008), Cape Nelson South Wind Farm (2009), Cape Sir William Grant Wind Farm (2015). Other onshore and offshore projects are proposed for the area and part of Portland's coastal east is within the declared Southern Ocean Offshore Wind Zone. The Proposal will support the ongoing development of the South West REZ, providing greater capacity for renewable energy generation and distribution to the NEM.

2.2 Site analysis

The Site comprises of four parcels of land, including the primary parcel where the BESS will be located, and the transmission corridor, that crosses south through Mount Clay State Reserve to the Heywood Terminal Station. Due to the large size of Mount Clay State Reserve, a 'Project Area' has been defined more tightly around the actual development footprint (Figure 3).

The primary parcel is predominantly cleared of native vegetation with some scattered trees along the boundary. Figure 4 shows a range of site photos. The primary parcel is currently used for agricultural grazing, with a dwelling in the northwest corner that will be vacated if the Proposal is approved. The Mortlake to Heywood 500kV transmission line crosses north-south through the centre of the primary parcel. The primary parcel has a frontage to Golf Course Road on its northern boundary and is bounded by Mount Clay State Forest to the south. The existing dwelling in the north-west corner will be vacated during the Proposal's construction and operation.

The transmission corridor includes land in the north-west corner of Mount Clay State Forest, Rifle Range Road, and the Heywood Terminal Station. Mount Clay State Forest surrounds the transmission corridor and is heavily vegetated (Figure 4). The existing 500kV transmission line runs north-south in a cleared easement

managed by AusNet. The easement consists completely of midstorey and understorey vegetation as any large trees have been removed. The proposed transmission corridor from the BESS substation to the Heywood Terminal Station is located wholly within this easement. Rifle Range Road is an unsealed road that crosses halfway between the primary parcel and Heywood Terminal Station providing access to the terminal station. There are multiple small tracks from Rifle Range Road to the terminal station that cross through Mount Clay State Forest.

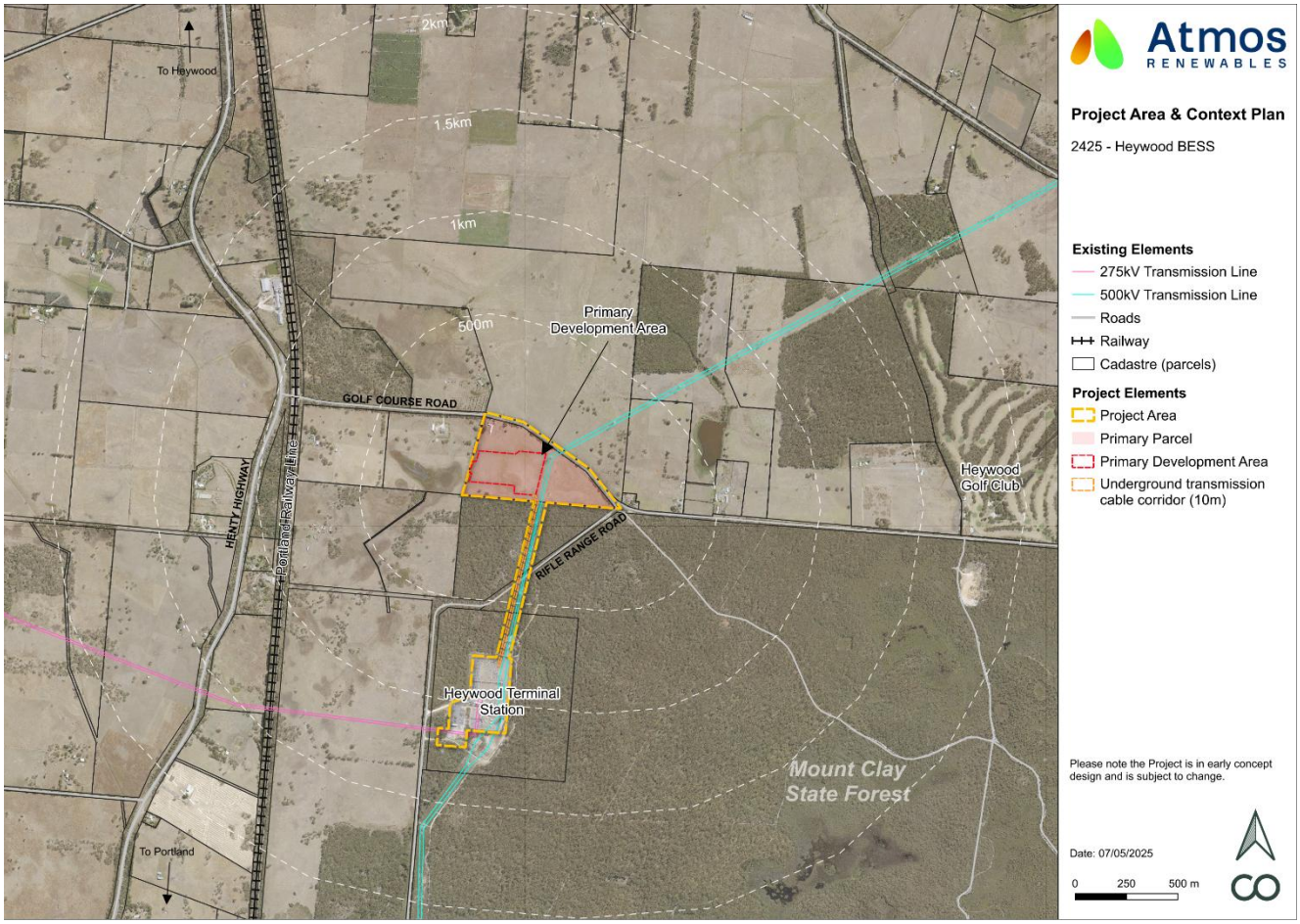


Figure 3 – Context Plan

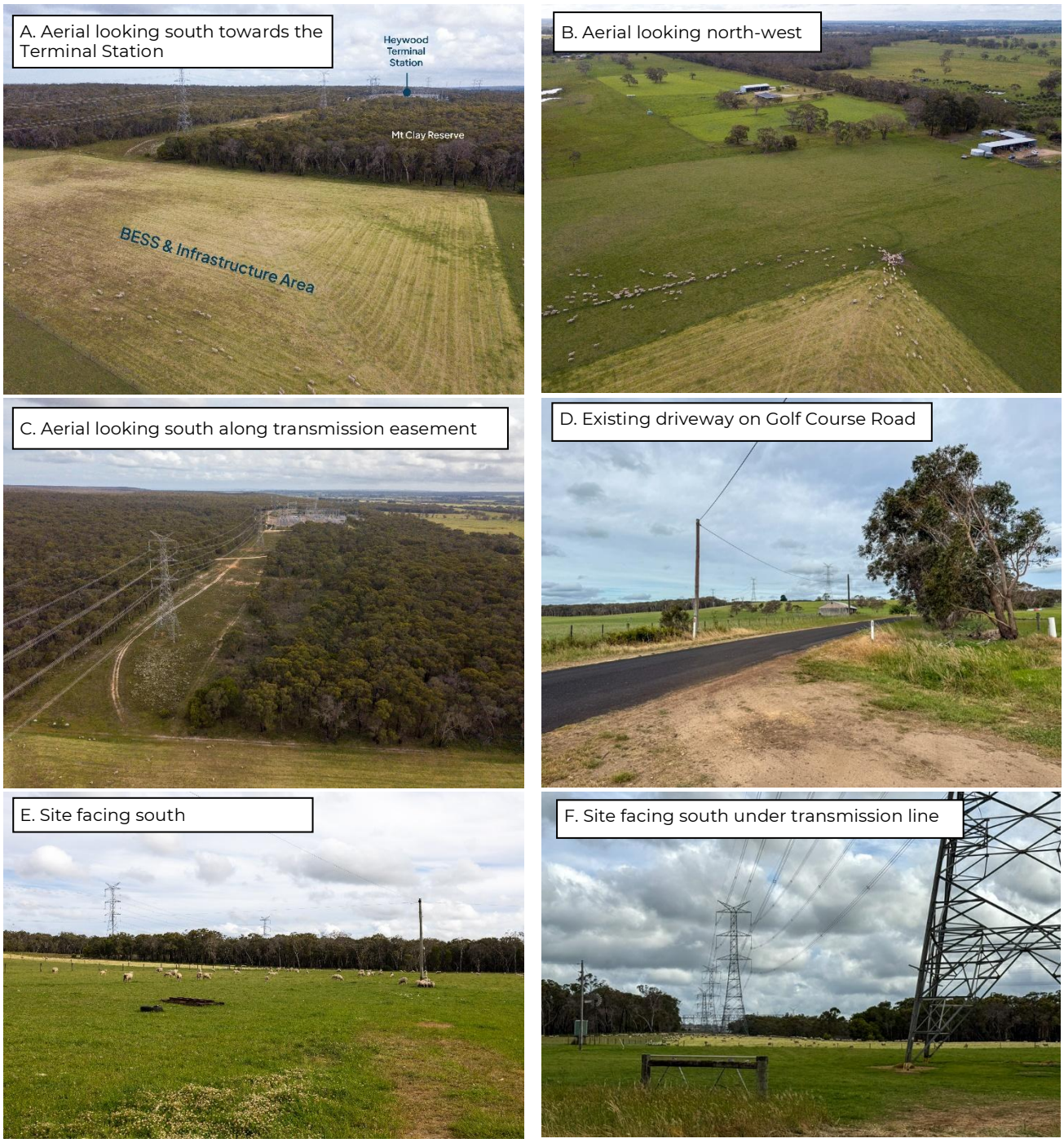


Figure 4 – Site photos

2.2.1 Site access

Access to the Site is via Golf Course Road, a Council owned road. Golf Course Road is a sealed single lane road that starts at Henty Highway (A200), crossing the Portland railway line, and runs east-west along the northern edge of Mount Clay State Forest.

2.2.2 Planning zones and overlays

The primary parcel is located within the Farming 1 Zone (FZ1) (See images within Figure 4). An Environmental Significance Overlay (ESO3) applies to the entire site and a Bushfire Management Overlay (BMO) partially applies to the southern half of the primary parcel.

The transmission corridor is located within the Public Conservation and Resource Zone (PCRZ) and Public Utility Zone 1 – Service and Utility (PUZ1). ESO3 and BMO apply to the entire transmission corridor.

The entire Site is mapped as Bushfire Prone Areas and includes areas of Cultural Heritage Sensitivity. Figure 4 provides map overviews of applicable zones and overlays, with Section 6.3 providing larger maps and a detailed planning assessment.

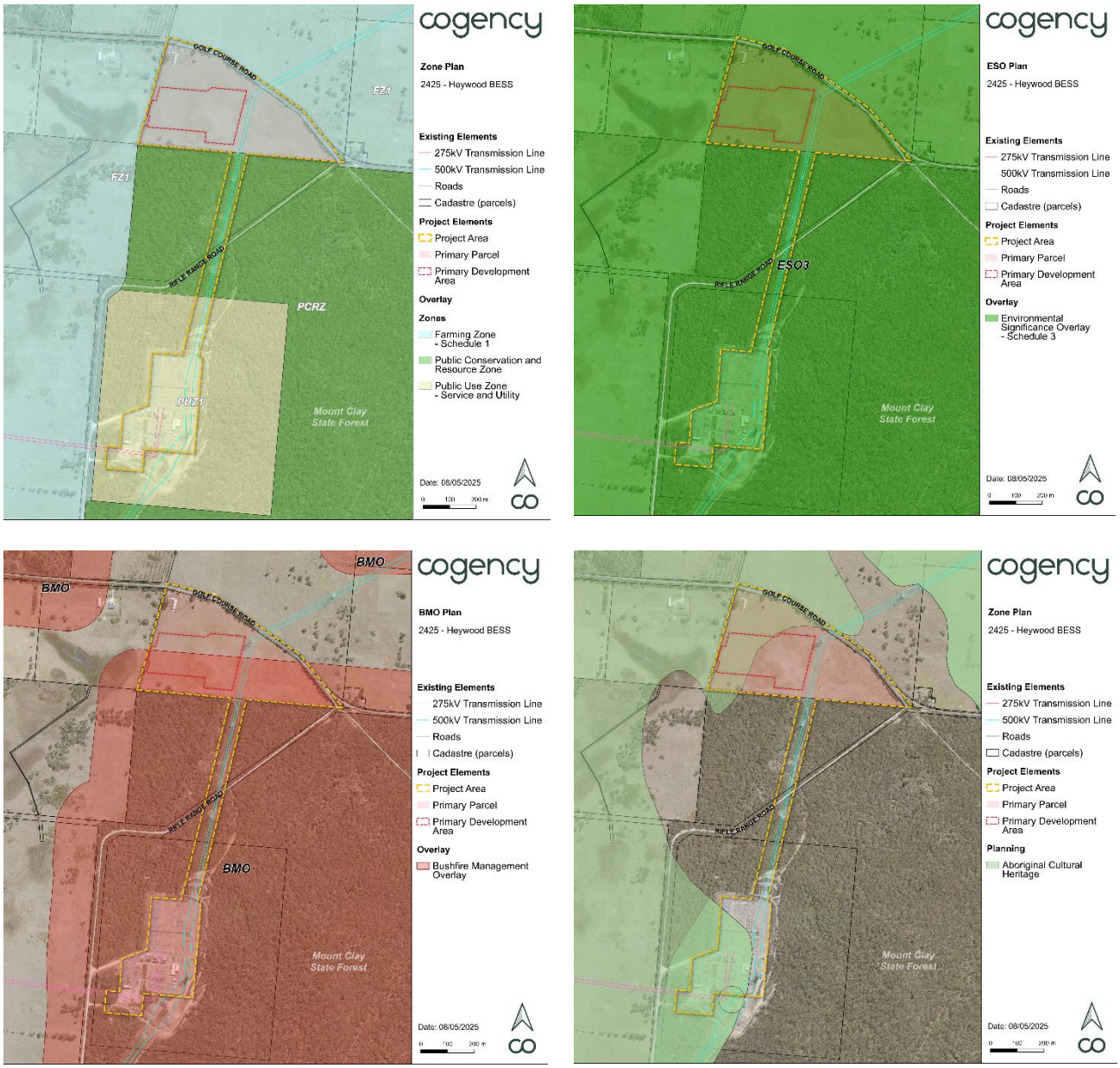


Figure 5 – Zoning and overlays summary

2.2.3 Vegetation

A biodiversity assessment has been undertaken by Ecolink (Appendix D) to identify the vegetation characteristics of the Project Area.

The primary parcel is generally cleared of native vegetation and contains pastures of exotic grasses, including environmental weeds. There are some small patches of native vegetation along the property boundary consisting of scattered trees or stands of canopy trees with little to no understorey beneath.

The transmission corridor has previously been cleared for construction of the existing 500kV overhead transmission and maintained as an active power easement. Nonetheless, there is native vegetation regrowth/colonisation consisting of native vegetation as a single large patch and smaller fragmented patches at the southern end. Trees have been removed underneath the powerline and the area was burnt in 2023, with the patches of native vegetation consisting completely of midstorey species and understorey. Outside the easement, the Mount Clay State Forest includes remnant woodland.

2.2.4 Topography and hydrology

A hydrology assessment has been undertaken by DCE (Appendix I), with LiDAR data to 0.3m accuracy. The primary parcel is generally flat with a 20m fall east-west across its extent. The elevation ranges between 31-51m AHD as shown in the Existing Conditions Plans in Appendix B. The existing slope continues outside the property boundary thus the site has external catchments to the west (a recognised wetland exists 40m west of the primary parcel boundary). There are no recognised waterways flowing through the primary parcel, although there are some overland flow paths.

The primary parcel is not subject to substantial overland flooding, however there is an overland flow path that traverses the BESS area that will need to be managed to ensure the finished level of development is above the 1% AEP flood level.

2.2.5 Existing infrastructure

The Site contains a dwelling and high voltage transmission line, identified in the existing conditions plans in Appendix B.

Dwelling: Located in the north-west corner of the primary parcel, the dwelling will be vacated during construction and operation.

High voltage transmission line: There is an easement (E-1) in favour of AusNet for the 500kV transmission line crossing north-south through the Site. The transmission line continues south from the primary parcel to the Heywood Terminal Station within a cleared transmission easement through Mount Clay State Forest.

2.2.6 Surrounding land uses

Broadly, the Site sits within a rural landscape surrounded by dwellings, agricultural land, patches of woodland and Mount Clay State Forest (see the existing conditions plan in Appendix B). The Site's surrounds include:

- Agricultural land mainly consisting of paddocks to the north, east and west.
- Henty Highway and Portland Railway Line to the west.
- Mount Clay State Forest to the south.
- Heywood Golf Club approximately 2km to the east.

Nearby dwellings

There are four dwellings on Farming Zone land within 500m of the primary parcel (Figure 6).

1. 82 Golf Course Road, approximately 180m west.
2. 181 Golf Course Road, approximately 90m east.
3. 211 Golf Course Road, approximately 320m east.
4. 99 Golf Course Road, approximately 170m north.

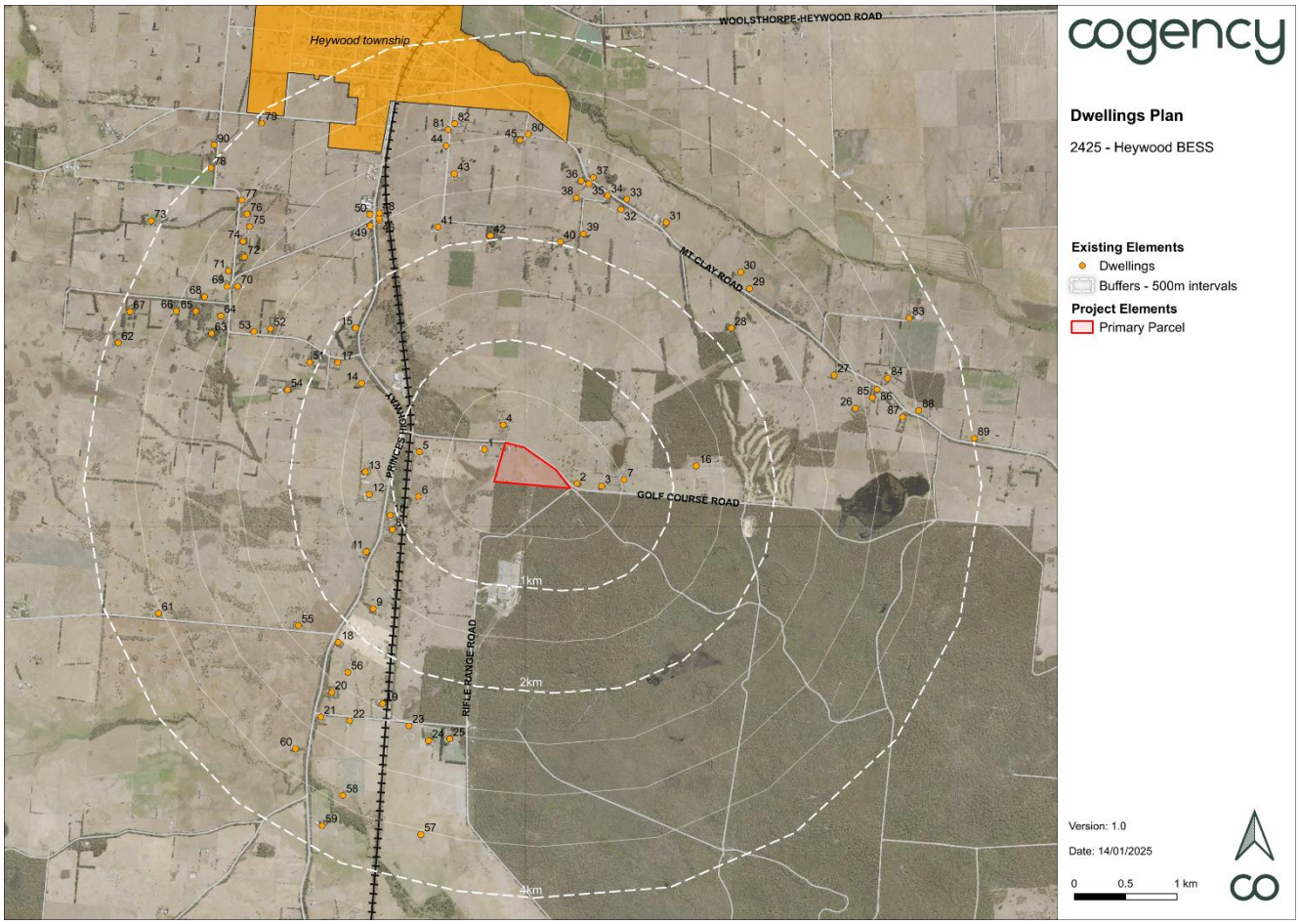


Figure 6 – Nearby dwellings plan

3. The Proposal

This chapter outlines the details of the proposed BESS as well as the Proposal's justification and benefits.

3.1 Overview

The Heywood BESS Proposal includes the following key components:

- BESS compounds with a conceptual capacity of up to 300MW / 1,200MWh
- Substation and associated electrical infrastructure
- Transmission connection infrastructure (underground cable, to connect the BESS to the existing Heywood Terminal Station)
- Auxiliary power supplies
- Protection and control equipment
- Operations and maintenance building
- Access points and internal tracks
- Water storage systems and fire-fighting infrastructure
- Radiant heat wall
- Security fencing and monitoring systems
- Earthworks
- Stormwater retention
- Landscaping / screening

Refer to Figure 7 for the concept layout of the proposal. Design plans are also provided at Appendix B.

To minimise fire risk, the Proposal includes an 80-metre setback between the BESS units and Mount Clay State Forest, and 50-metre setback for the substation, ensuring that all BESS, inverter and substation components are outside the area deemed a Bushfire Attack Level (BAL) rating of BAL-19. The Proposal also includes a 10-metre asset protection zone (APZ) around the BESS area, substation and associated infrastructure.

A 15-metre offset to external boundaries and adherence to tree protection zones (TPZ) has been established to protect all scattered trees and patches of native vegetation within the primary parcel and along its boundaries (see Appendix B). Vegetation screening will surround the edges of the Proposal to reduce the visual impact to nearby sensitive receptors.

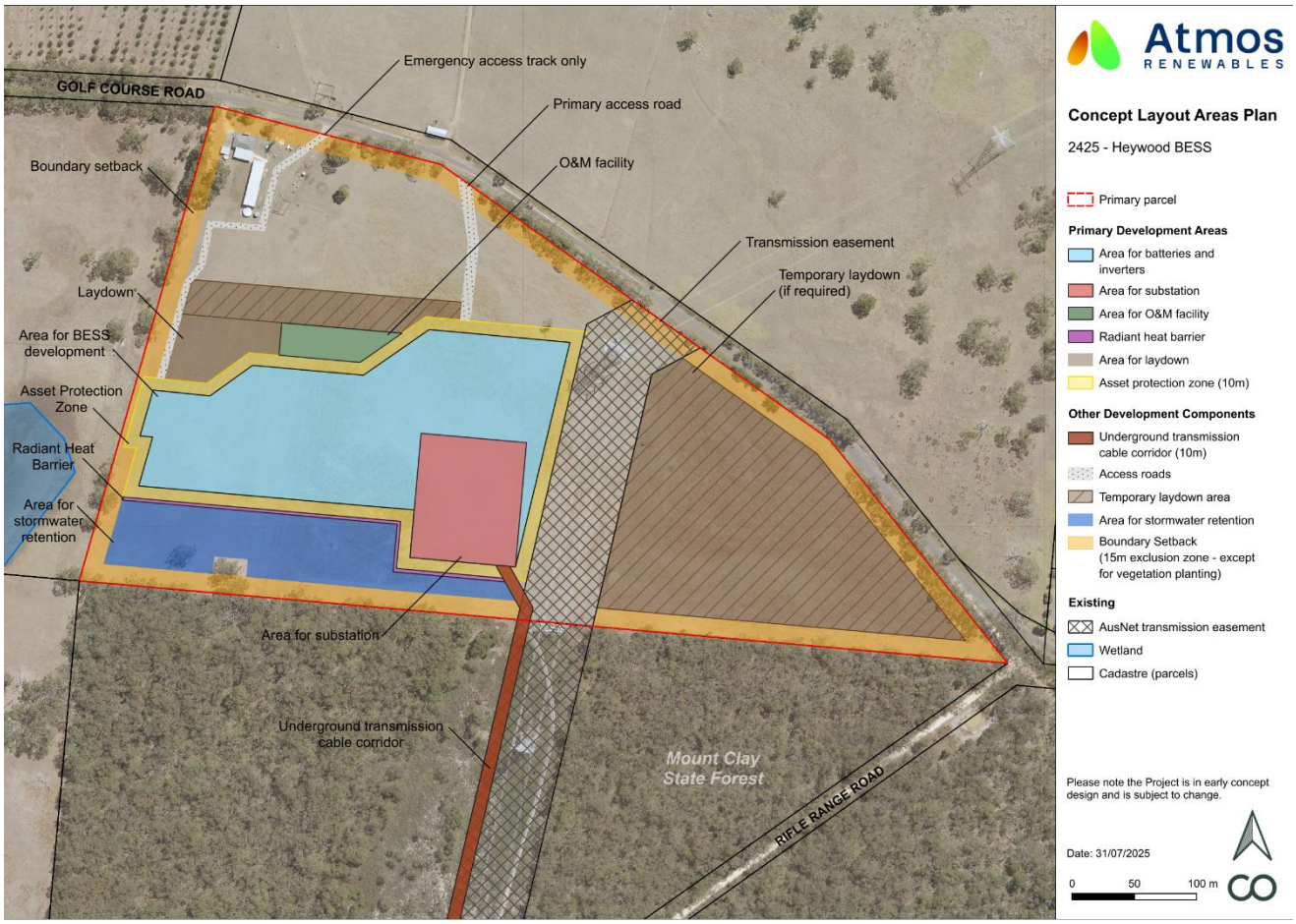


Figure 7 – Concept layout plan

3.2 Battery storage

The Proposal will most likely use Lithium Ferro(iron) Phosphate (LFP) cells. LFP battery cells are durable and have an extensive lifespan, a broader thermal operating range, and release less energy during thermal runaway than other battery technologies. This means they have a lower risk of overheating or catching fire due to their unique safety features. Figure 8 presents diagrams of the LFP cell, Battery Module and Rack.

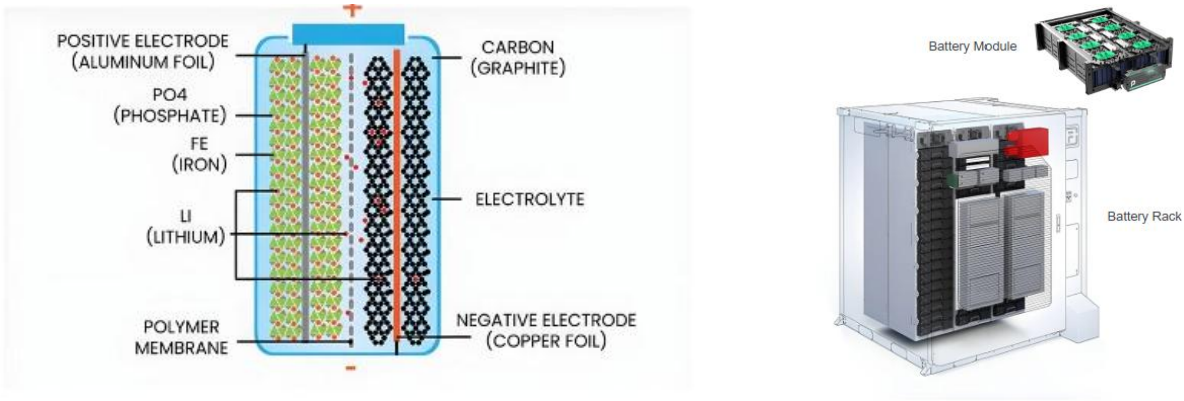


Figure 8 – LFP cells, Battery Module and Rack diagram

The Proposal includes rows of battery units (approximately 230 units) arranged with the inverters located in between the battery rows. The battery enclosures house multiple racks of modules and contain monitoring and communications equipment, a cooling system, and a fire detection and suppression system. The modularity of the batteries allow for ease of construction and maintenance.

3.3 Associated infrastructure

The Proposal includes electrical cabling and infrastructure that connects the BESS units and inverters with an on-site substation, that then allows connection to the NEM. Figure 9 provides a graphic illustration of the primary components and connections. The substation area will include a HV step-up transformer, switch room and control room.

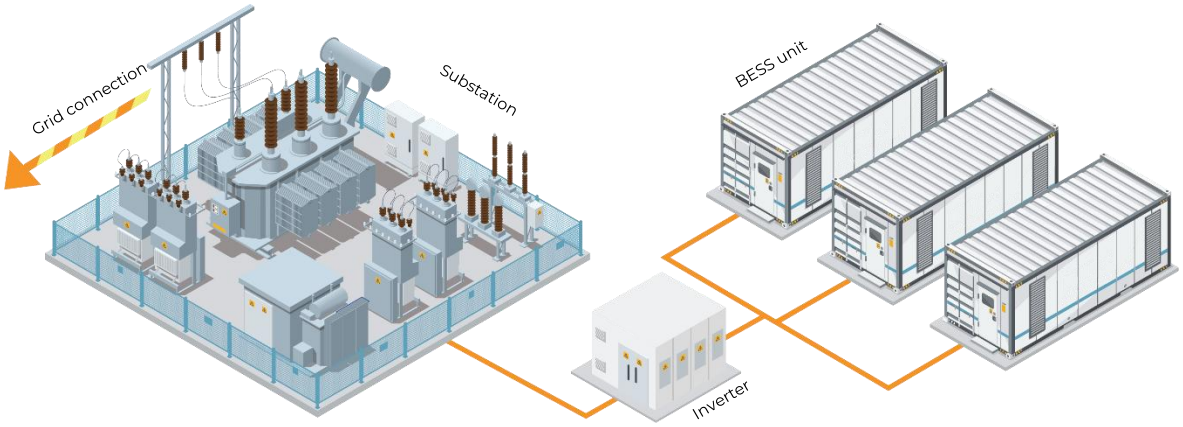


Figure 9 – Stylised representation of BESS units, inverter and substation

To support the facility's operation, there will be an operation and maintenance building located on the northern side of the BESS area.

3.4 Grid connection

The Proposal includes an underground 275kV transmission connection to the NEM at the Heywood Terminal Station. The transmission connection will run approximately 1km south from the substation within the primary parcel to the Heywood Terminal Station, via the existing transmission easement in favour of AusNet through Mount Clay State Forest. The exact connection point within the Heywood Terminal Station will be determined following further discussion with AusNet.

The transmission route is strategically located within the existing cleared transmission easement (in favour of AusNet) to avoid and minimise impacts to native vegetation (particularly trees) in Mount Clay State Forest. The construction corridor and trench have been designed to ensure no tree loss.

To install the cable, a 1-metre wide trench is required, with a total disturbance area width for construction (surface only) of 10 metres (Figure 10). The trench and construction corridor will be offset from the edge of vegetation to avoid tree loss – by ensuring the TPZ of trees surrounding the easement are sufficiently avoided. To meet AusNet safety and construction requirements, the construction corridor must be offset at least 20m from the centreline of the existing 500kV transmission.

Notably, the Heywood Terminal Station is part of the SA-Vic interconnector, so the Proposal can potentially provide support to the SA grid as well as Victorian grid.

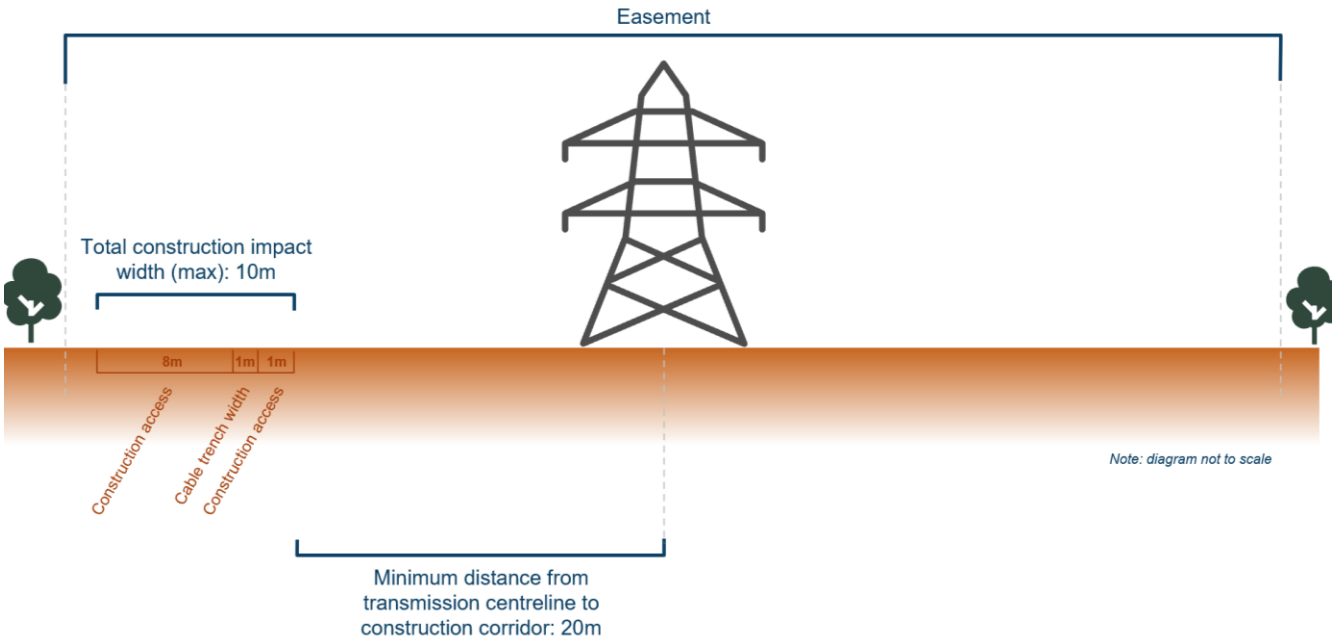


Figure 10 - Cross-section of proposed connection cable construction

3.5 Access and parking

A traffic impact assessment by One Mile Grid presents existing road and traffic conditions, as well as modelling increases in vehicle movements by the Proposal (Appendix F and Section 7.3 for more detail).

While the Site has existing agricultural and dwelling access points, they are not suitable for the required heavy-vehicle and construction movements generated by the Proposal. As such, primary access to the Site will be from a new access point to Golf Course Road, in a location of an approximately 35-metre-wide gap between existing roadside vegetation, ensuring there is no impact to native vegetation for the proposed access. A swept path and sight-distance analysis demonstrates that the proposed access point is suitable.

The road section between the Henty Highway and the Site is a sealed rural road approximately 4 metres wide. No additional works to the Golf Course Road are required.

Golf Course Rd directly connects to Henty Hwy, an arterial road running north to Heywood and beyond and south to Portland. The Portland railway line runs north-south between Henty Hwy and the Site, with an at-grade railway crossing on Golf Course Road. The railway crossing does not have boom gates, bells or lights.

Within the site the access track will run from the entrance point south to the development area, with a loop surrounding the BESS and infrastructure area. Additional internal tracks between BESS areas will provide ample circulation. These tracks will be designed to accommodate both construction and operational traffic, including access for fire trucks in accordance with CFA guidelines (Section 4.2 of the Design Guidelines and Model Requirements: Renewable Energy Facilities, Country Fire Authority (CFA), August 2023).

A secondary (emergency only) access will utilise the existing crossover and driveway at the dwelling.

Car parking for construction staff will be provided within a parking area on-site, which is expected to be in the north-western corner of the primary parcel. Given the large area of the overall site and the position of the BESS units in the southern portion of the site, all car parking demands are expected to be comfortably accommodated on-site.

3.6 Earthworks and drainage

The BESS and inverter units as well as substation and infrastructure will require engineered hardstands, necessitating earthworks (site preparation and some cut/fill). The concept design seeks to ensure that

earthworks are balanced and stormwater runoff will be effectively managed to ensure there are minimal changes to existing flow regimes (see Appendix I and Section 7.7 for more detail). The hardstands within the primary parcel will be graded to slope towards the south to protect the BESS from overland external flows and to isolate surface runoff in a retention basin and swale system. This will ensure that any water runoff can be controlled, and the post-development rate and volume of flows to the neighbouring western property will not be increased.

A vegetated swale located at the south-east boundary will collect all runoff and direct it to an intercept dam at the south-west boundary, providing volume reduction, stormwater retention and stormwater isolation. The intercept dam will ensure that there is no increase in peak flow following the development of the Proposal and, in the case of an environmental incident, will keep any contaminated runoff on-site and separate to downstream waterways.

An existing overland flow path on the northern side of the primary parcel will be partially redirected around the BESS area via a culvert and/or pipe.

3.7 Firefighting infrastructure

In accordance with the CFA Guidelines, the following infrastructure will be provided as outlined in Appendix H:

- Fire hydrant system (AS2419 – open yard protection requirements)
- Firefighting water supply
- Two access points, including an emergency access, and internal access tracks that can be used by firefighting vehicles
- Retention basin to contain contaminated firefighting water
- Radiant heat wall, approximately 5 metres high, separating the BESS units and Mount Clay State Forest.

3.8 Additional works

Perimeter vegetation screening will be provided to filter views at neighbouring residences to reduce the visual impact of the Proposal. The design and location of the screening will be informed by the Landscape and Visual Impact Assessment (Appendix G), with a Landscape Plan requested as a condition of permit.

A 2-3 metre high mesh security fence will be installed around the Primary Development Area to deter theft or vandalism and prevent unauthorised access to equipment.

3.9 Employment

The development of the Heywood BESS, an approximately $500 million investment, is expected to create approximately 100-150 direct jobs during the construction stage. These jobs will be both local and international, comprising jobs in the fields of manufacturing, electrical, civil engineering, roadworks, cabling, construction, fencing, and construction.

Beyond construction, there are expected to be around 2 FTE's intermittently at the Site for the lifetime of the Proposal[1]. These jobs will be responsible for the operations and maintenance of the facility, including reporting, safety, monitoring, and upkeep of the facility. The Proponent is committed to procuring locally to the extent possible, drawing from the skills in Heywood or wider Glenelg Shire region.

The Proposal will play an important role in growing the renewable energy generation and storage industry in Victoria. As the state's energy supply transitions to renewable energy, more demand for storage will be created.

[1] Construction and ongoing employment numbers have been calculated from similar projects across Australia. Exact employment numbers will be confirmed closer to construction.

The construction and maintenance of the Heywood BESS will include upskilling local workers and utilising local contractors and suppliers where possible. This will grow Victoria's ability to build and operate BESS projects, securing the future competitiveness of other projects in the local energy sector.

3.10 Construction, operation and decommissioning

Construction

Construction will be a key period of the Proposal's development and is expected to include the following elements:

- Delivery, assembly and installation of BESS components and ancillary infrastructure
- Installation of fencing, lighting and site signage, including safety signage
- Earthworks to achieve project bench and hardstand areas
- Establishment of temporary construction compound, car parking spaces and internal roads
- Installation of underground cabling from onsite substation to the Heywood Terminal Station

The majority of vehicles expected to service the Site during construction include a vehicle size up to and including 19m semi-trailer trucks and truck and quad dog combination trunks.

A detailed Construction and Environmental Management Plan will be prepared in accordance with any conditions of a planning permit.

Operation

The operation of the Proposal will involve charging and discharging of the housed battery units, monitoring and maintenance of the batteries, inverters, substation, internal cabling as well as general site maintenance and general security monitoring. Ongoing maintenance activities will include the testing and replacement of components, power connection and security, access tracks and security, and undertaking electrical maintenance. The Proposal is expected to have an operational lifespan of between 20 to 25 years.

Decommissioning

At the end of the Proposal's anticipated operational lifespan, (approximately 20 to 25 years), and assuming the facility is not upgraded or expanded, above ground components would be removed and re-purposed where possible. The aim of the decommissioning phase will be to return the land to its original condition and commence site rehabilitation consistent with the surrounding landscape.

Upon commencement of decommissioning, all infrastructure would be removed, with key elements including:

- Removal of all aboveground BESS and substation site infrastructure, including permitter fencing, site offices and maintenance buildings
- All laydown, bench, access tracks, and infrastructure to be decommissioned and removed.
- Project area to be returned to the condition and consistency of surrounding landscape.

Other elements, such as vegetation planting and flood retention basin will be maintained on site.

3.11 Project justification

3.11.1 Site suitability

The Site is well suited for a BESS and benefits from its location within the South West Victoria REZ and proximity to the Heywood Terminal Station. The Site is considered suitable for the use and development of a BESS for the following reasons:

- Proximity to the Heywood Terminal Station for connection to the NEM

- The Site is generally level reducing bulk earthworks
- Zoning that allows for the use
- Historic agricultural activities on the primary parcel meaning it contains low biodiversity values
- Large land parcel (primary parcel), allowing the Proposal to be set back from Mount Clay State Forest and nearby residences
- Located away from residential areas in Heywood
- Transmission connection via an existing cleared transmission easement.

3.11.2 Design iteration

The Project has had significant design evolution since Atmos initially identified the land and considered early feasibility concept design in 2023. Atmos have been actively pursuing layout evolution to avoid and minimise potential impacts.

Since securing the site over eighteen months ago, significant stakeholder engagement and technical investigations have informed changes. Atmos has undertaken a comprehensive suite of technical investigations to inform and support the concept layout design. The early feasibility and concept design has evolved significantly, leading to lodgement of a planning permit application in May 2025.

Notably, this evolution has included agreement with AusNet to co-locate the underground transmission connection within the existing high voltage transmission easement, allowing full avoidance of the high-quality, remnant native vegetation within Mt Clay State Park. Having managed to fully avoid native vegetation on the primary parcel, the only remaining ecological considerations for the project relate to impact on the native understorey/grassland in the existing transmission line easement for the connection from the on-site substation to the HTS.

Other key influences include design evolution to avoid and address a range of considerations, including noise, cultural heritage, biodiversity, existing infrastructure and hydrology.

The significant efforts to redesign to achieve avoidance, minimisation and mitigation of potential impacts means that the Project has received positive feedback from a range of stakeholders, including DEECA, DTP, AusNet and community members.

Selecting the Location

The primary drivers for selecting the site at Heywood are:

1. Direct access to the Heywood Terminal Station – with 500kV and 275kV transmission line connections – allowing the project to easily connect into the grid
2. Location within the SWREZ, with proximity to existing and proposed renewable energy generation projects and the major energy user Portland Aluminium, as well as South Australian interconnector
3. Cleared agricultural land, suitable for avoiding ecological constraints.

Summary of Influences

Atmos has iteratively evolved the project design to respond to site values and engineering requirements.

The primary factors influencing design from a commercial and engineering perspective include:

- Addressing land tenure with Crown Land status and existing transmission easements towards and including the Heywood Terminal Station
- Responding to AusNet requirements for installation of underground transmission cable within their easement (construction corridor width and placement)
- Managing electrical engineering safety and design standards.

To accommodate the desired project capacity the total development footprint (including ancillary infrastructure, but excluding laydown areas and transmission corridor), would be approximately 5 hectares.

The primary site values (discovered through technical investigations) that have influenced design iterations include:

- Maximising separation distances from neighbouring residences (closest non-involved dwellings to the north and east) for noise protocol adherence
- Identifying an appropriate buffer to Mt Clay Reserve woodland – since determined to be 80m from vegetation edge / property boundary to reduce bushfire risk
- Avoiding and minimising impacts to native vegetation as much as possible (the HTS is surrounded by remnant forest (Crown Land – Mount Clay, EVC 16), with existing high-voltage connections to the north, west and south)
- Avoiding cultural heritage material or high sensitivity areas (limited artefacts found through complex testing)
- Providing sufficient runoff capture and storage to address Council requirements of maintaining existing run-off flow rates, volume and water quality (responding to the low-lying nature of the adjacent land that the primary parcel naturally slopes towards)

These primary considerations are presented in a chronological evolution within in Table 3.

Future detailed design will further refine the layout, with expected minor changes likely to address new technical information, engineering requirements, and stakeholder and community feedback.

Design Iterations

The initial site selection and concept design has changed significantly in response to the factors described above.

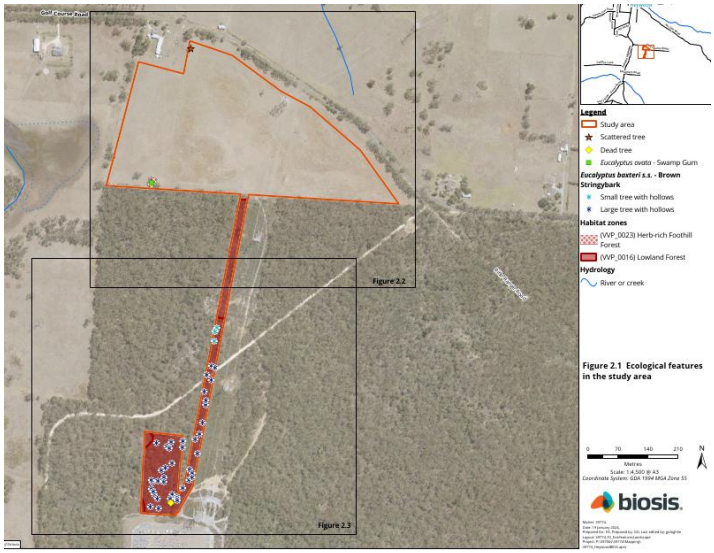
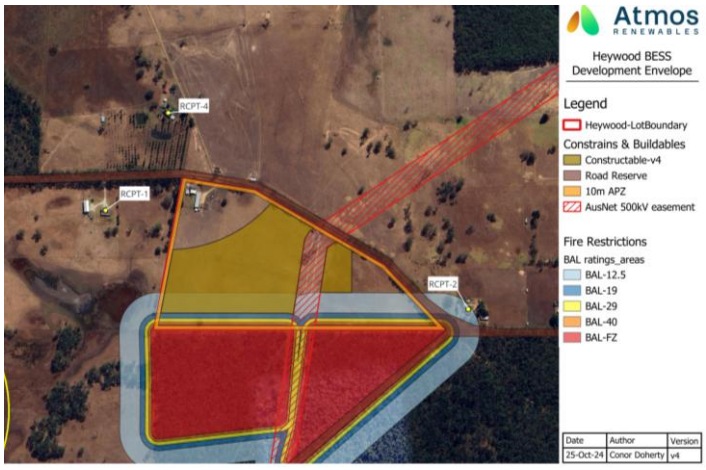
The original project design involved an underground cable and substation located within the densely vegetated area of Mt Clay State Park. Biosis (2023) undertook a flora and fauna assessment of the project at that time and identified the impacts would include 3.176 ha of native patch vegetation including several threatened flora species. 44 trees with hollows were also to be impacted resulting in impact to habitat critical to the survival of the Gang-gang cockatoo, blue-winged parrot and red-tailed black cockatoo.

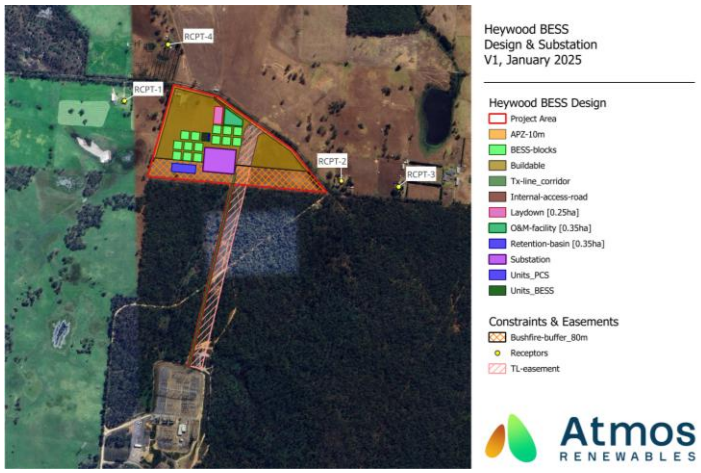
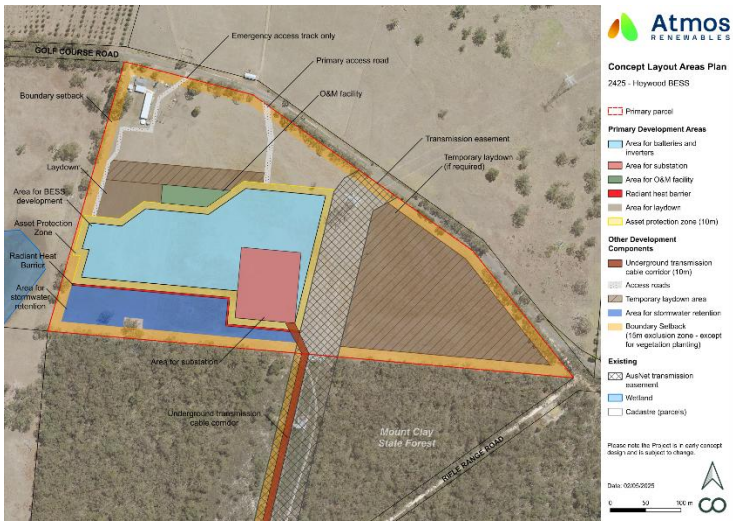
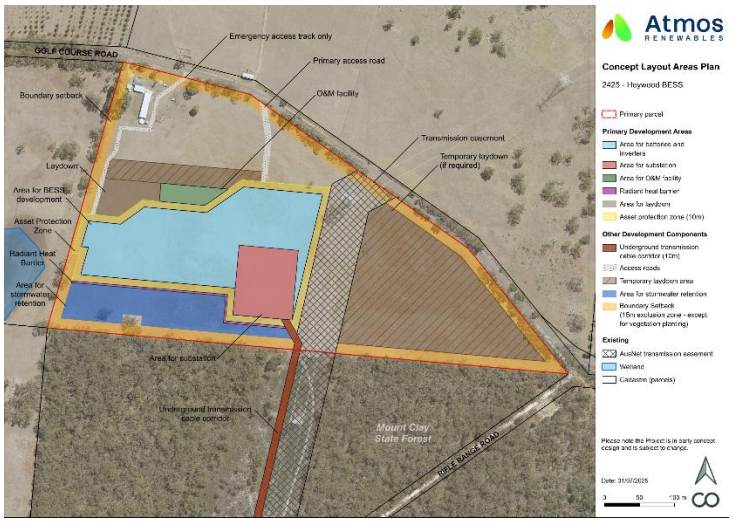
Due to the unacceptable nature of these impacts, Atmos moved the substation to cleared land and investigated horizontal directional drilling (HDD) as an installation method for the underground cable. Whilst this reduced the extent of impacts, the HDD launch and exit pads still resulted in large areas of native vegetation removal and associated impacts on threatened flora and fauna. As a result, Atmos considered HDD use unfeasible for the project

At this time, Atmos investigated the potential of locating the cable within the cleared, existing transmission line easement that connects the battery site and Heywood Terminal Station. Whilst not initially the preferred option by AusNet, engineering studies and extensive consultation with AusNet's technical operations team demonstrated that the cable could be installed and operated safely near the existing 500kV overhead transmission line. Moving the cable to within the previously cleared easement has resulted in the avoidance of the highest quality native vegetation and has avoided all impacts to trees or habitat for the threatened bird and bat species that utilise the area.

The current design requires a ten-metre-wide corridor extending from the private property down to the Heywood Terminal Station. Arboriculturist (Ryder, 2025) advice has confirmed that the construction corridor area will be able to sufficiently avoid impacts to the trees and their roots (ensuring no tree loss) located west of the powerline easement. Therefore, native vegetation impacts are limited to the 10m-wide construction footprint within this cleared, existing easement. A further stipulation by AusNet regarding the cable construction corridor in the early planning application phase has meant that it will be located at least 20m from the transmission centreline.

Table 3 - Design Iterations

Design version (date)	Changes/notes	Influences
Q4 2023		
	The initial concept design had to avoid the existing 500kV transmission easement, requiring transmission connection within Mt Clay State Reserve woodland.	*AusNet's initial position was to exclude construction within the existing easement.*
Q2/3 2024		
 Below: BAL assessment 	Transmission connection secured to run within existing easement. Substation moved to primary parcel. Development area 'pushed' away from woodland edge and from neighbouring dwellings.	*Biosis investigation noted extremely high constraints due to ecological values. Due to that, Atmos worked with AusNet to negotiate approval to utilise the existing easement.* *Noise and fire feasibility studies identified constraints.* *Setback applied to neighbouring dwellings to the north, east and west to ensure compliance with noise criteria.* *Buffer applied to Mt Clay State Park to ensure BESS units were not within 12.5 BAL zone.*

Q1 2025		
	Minor changes in footprint (including boundary exclusion area) and arrangement of components. BAL exclusion area and external boundary setbacks.	*Protection of trees in road reserve and setbacks to neighbours.*
Q2 2025		
	Refinements to achieve application concept. Transmission cable set back from forest edge within transmission corridor to protect trees. Additional property secured (neighbour) to address noise limit. Access point updated.	*Arborist report on trees, TPZs and setbacks to avoid tree losses.* *Complex testing results for cultural heritage (limited artefacts).* *Radiant heat barrier & 2nd (emergency) access.* *Drainage concept design (retention basin).* *Safe sight distances on Golf Course Road.*
Q3 2025		
	Refinements to cable construction corridor. Minimum setback of 20m from transmission centreline (construction corridor moving approximately 6m west of previous alignment).	*AusNet requirements to achieve their safety and construction requirements.*

3.11.3 Why battery energy storage?

Battery energy storage is essential to ensuring Australia's electricity grid is prepared for the phase out of traditional coal fired power stations in the coming decades. The variability of renewable energy sources means that there is a need for storage within the grid to supply power during periods of low generation.

Further, the continued popularity of domestic rooftop solar is leading to an oversupply of generation in the middle of the day during sunny periods, offering the opportunity to store power during this time, and release it in the evening. Battery storage technology has advanced to a point where the delivery of numerous grid-supporting batteries is cheaper and more efficient compared to other energy storage solutions such as pumped hydro. They will contribute to form a crucial part of ensuring an adequately firmed renewable energy capacity, as directed in AEMO's Integrated System Plan, which highlights a need for 46GW/640GWh of dispatchable storage by 2050.

The Heywood BESS will strengthen grid stability for communities in the region through the ability to rapidly increase or decrease output, by providing 'ancillary services' such as frequency and voltage support.

In supporting the introduction of more renewable energy generation, the Proposal will assist with Victoria's renewable energy transition and support the legislated Victorian Renewable Energy Target for 50% of electricity to be sourced from renewables by 2030, which will increase to 65% by 2030 and 95% by 2035. Importantly, the Proposal will be crucial to achieving the soon to be legislated Victorian energy storage targets of at least 2.6 GW by 2030 and 6.3 GW by 2035.

4. Community and stakeholder engagement

Community and stakeholder engagement is fundamental to delivering positive and effective outcomes for both energy projects and the local community. Proactive, meaningful, inclusive and robust engagement can be seen as a direct investment in both strong communities and the success of the renewable energy transition.

Atmos has sought to ensure cooperative and mutually supportive participation by key community and stakeholder groups in line with the CEC Best Practice Charter for Renewable Energy Projects (2021) and the International Association for Public Participation's (IAP2) Public Participation Spectrum (2018).

4.1 Engagement objectives, principles and commitments

Atmos acknowledges that active and early engagement with the community and other relevant stakeholders is a crucial part of the planning process. It helps to foster greater understanding of and support for the Proposal, and to improve the design and development outcomes through the exchange of knowledge and information.

Atmos is committed to delivering best practice engagement, with the overarching objective of ensuring that the identified community and stakeholder groups are proactively and meaningfully informed, consulted and involved, and that the benefits of the Proposal are genuinely felt by local community.

The Engagement summary report (Appendix K) presents the engagement objectives and principles for the Project. These include:

- Engage in a respectful and inclusive manner
- Prioritise clear, accessible, timely and accurate information about the Project
- Protect and preserve Country, cultural heritage and the environment
- Ensure economic and social benefits are shared
- Ensure and encourage cultural competency
- Implement feedback, monitor progress and report back.

4.1.1 Best Practice Charter

In 2022, Atmos became a signatory to the Clean Energy Council (CEC) Best Practice Charter. The Charter outlines a voluntary set of commitments they will uphold in the development of current and new clean energy projects. Signatories commit to engage respectfully with the communities in which they plan and operate projects, to be sensitive to environmental and cultural values and to make a positive contribution to the regions in which they operate. The principles from the Charter closely align with Atmos' company values of integrity, safety, courage and humility.

4.1.2 First Nations commitment

Beyond the statutory requirements of the Proposal, Atmos is committed to ensuring sensitive and respectful engagement with the First Nations communities.

Atmos released their Reflect Reconciliation Action Plan in November 2024 that focused on ensuring they are recognised as an inclusive, culturally competent and culturally safe organisation. Atmos seeks to build strong partnerships with the Aboriginal and Torres Strait Islander peoples, communities, and organisations, in the areas in they are developing and operating projects, to progress their vision for greater involvement and shared benefits with First Nations Peoples. There are four reconciliation action plan levels that provide a structured approach for companies to advance reconciliation and Atmos is committed to continuing their reconciliation journey through their second plan.

The Proponent recognises that the transition of renewable energy presents an opportunity to collaborate with First Nations communities and establish partnerships that empower First Nations people to participate in the social, economic and environmental benefits of projects.

The Proponent is committed to:

- Consulting early to establish a foundation of trust and mutual understanding.
- Building relationships before seeking knowledge and information.
- Creating local contractor and supplier opportunities for First Nations peoples.
- Creating opportunities for First Nations businesses in the areas of procurement, training, employment, and tourism services.

4.1.3 Commitment to engagement

The engagement approach for the Heywood BESS has been guided by the IAP2 Core Values and the Public Participation Spectrum. The spectrum is founded on the premise that different stakeholders will have varied levels of involvement in decision-making.

For the purposes of this Proposal, Atmos commits to 'inform', 'consult' and 'involve' the appropriate stakeholders through an effective engagement process based on the objectives and promises outlined in the spectrum in Figure 11.

	Inform	Consult	Involve	Collaborate	Empower
Community engagement objective	Provide balanced and objective information. Assist the community in understanding all aspects of the project, including possible problems/issues.	Obtain feedback from the community on plans, options and/or decisions.	Work directly with the community throughout all stages of the project. Ensure community concerns and aspirations are consistently understood and considered.	Partner with the community in each aspect of planning, development and decision-making, including the development of alternatives and the identification of the preferred solution.	Place decision-making in the hands of the community, so the community leads the development of the renewable energy project.
Promise to community	Keep the community informed through all stages of development, including issues and delays.	Keep the community informed, listen and acknowledge suggestions and concerns. Provide feedback on how input influenced the decision.	Work with the community to ensure concerns and aspirations are directly reflected in the alternatives developed. Provide feedback on how input influenced the decision.	Look to the community for direct advice and innovation in formulating solutions. Incorporate advice and recommendations into decisions to the maximum extent possible.	Implement what the community decides.

General community and local members

Regulators, key stakeholders and near neighbours

Figure 11 – Engagement commitment in relation to the IAP2 spectrum

4.2 Engagement to date

This section details the engagement Atmos, with support from Cogency, has undertaken during the feasibility and design phases of the Proposal to inform the design and planning application.

The engagement program to date is presented in summary groups for near-neighbours, the local community and other stakeholders. A detailed summary of key stakeholder and community engagement is attached to this report (Appendix K).

The Project was publicly announced over the course of four weeks in January 2025, supported by targeted stakeholder and community engagement, and the team has sought to monitor and respond to interest in the Project from local stakeholders.

A variety of different communication materials have been created and distributed throughout the engagement process. These included fact sheets, posters, a newspaper advertisement, project specific email and a webpage within the Atmos website. Copies of these communication materials are provided in an appendix of the Engagement Summary Report.

4.2.1 Near-neighbour engagement

To date, Atmos have spoken directly with all landowners along Golf Course Road (seven residences as well as vacant farming lots). Communication activities began in 2023 and have included letters, phone calls, and in person meetings.

On 3 February, a letter of introduction was sent to 42 neighbours within 2km of the primary parcel introducing them to the project team and informing them of the Proposal. The correspondence included an invitation to attend the forthcoming information stall. Neighbours within 1km were also offered a one-on-one meeting with the project team.

There was a range of sentiment across the neighbours, directly tied to proximity to the primary parcel. All neighbours have been highly engaged with the Proposal. Their noted concerns included:

- Property value impacts
- Insurance premium impacts
- Noise and visual impacts
- Traffic impacts
- Construction disruption.

Atmos are continuing to engage with near-neighbours who hold concerns as well as those supportive of the Project. Follow-up meetings have been held one-on-one with neighbours on Golf Course Road in May 2025, with many technical queries considered addressed. Some outstanding concerns remain on visual impact and property value.

4.2.2 Stakeholder engagement

As part of the early design and engagement phase of the Proposal, the team undertook several engagement activities prior to the planning submission, in accordance with the engagement strategy. Summaries of these engagement meetings are included in the Engagement Summary Report. Meetings and communication have included:

- DTP (Planning) and DEECA (Environment)
- Glenelg Shire Council (Executive team and Councillors)
- GMTOAC
- Heywood Golf Club

- AusNet.

Councillor comments included:

- Questioned how a BESS lowers wholesale electricity prices.
- Number of jobs.
- Opportunities for local contractors and construction accommodation.
- Noise and fire risks of the Proposal.
- Compensation and community benefits.
- Decommissioning and recycling opportunities.

4.2.3 Community engagement

To ensure the broader community had opportunities to be involved in the Project, the project team hosted an information stall at the Heywood Wood, Wine and Roses Festival 22 February 2025. The purpose of the information stall was to provide information about the Proposal to the community, provide an opportunity for community members to ask questions and voice their opinions, encourage engagement in the planning process, as well as establish a point of contact for the Proposal.

The stall introduced the Project in-person to interested community members and stakeholders, with over 30 attendees. This allowed community members to ask questions regarding the technical elements of the Proposal and conduct in person discussions with members of the proposal team.

Table 4 summaries the key details of the information stall.

Table 4 – Consultation summary of the information stall

Engagement Objective	Success Criteria
Date & time	Saturday 22 February 2025, 11:00am to 3:00pm
Location	Heywood Town Green, Edgar Street, Heywood
Team members	Billy Greenham, Associate Director, Cogency Kate Munro, Head of Development, Atmos Baifu Du, Senior Project Manager, Atmos
Event promotion	▪ 2 x 1/8 page advertisements in The Portland Observer ▪ 75 x letters to neighbours
Stall set up	Marquee set up with one table, one pull up banner, flyers, factsheets, and registration forms.
No. of attendees	34 people visited the stall. Most people interacted for more than a cursory moment.
Overall sentiment	The majority of visitors had a positive sentiment towards the additional energy storage, understood the rationale, and while having asked questions most commonly about fire risk, they appreciated the responses. Multiple Councillors and the Glenelg Shire Council CEO came to visit and discuss the Proposal as a follow-up to the online Councillor Workshop. Overall, the Councillor sentiment seems to be quite strongly positive towards the project and the engagement program. Two members of the Heywood Fire Brigade came to ask questions. Overall, they had a positive sentiment towards the project and understood the Proposal will be designed to mitigate fire risk. They expressed an interest in meeting the Proposal's fire consultant to learn how to manage the Proposal.
Key themes	▪ Fire risk (considering proximity to the forest) ▪ Whether this project would lead to additional renewable energy projects or transmission upgrades ▪ Timing of construction.

5. Legislation, policy and guidelines context

The Proposal is strategically supported by a number of renewable energy and climate change related policies at the Commonwealth, State, Regional and Local levels. When viewed holistically, the Proposal supports the relevant objectives and actions of these policies, with particular regard to efforts for greater energy storage to decarbonise Australia's energy generation, in turn minimising greenhouse gas emissions and supporting renewable energy generation infrastructure.

5.1 Policy and strategic summary and alignment

Table 5 outlines the policies, legislation and plans that are relevant to the Proposal and provides a brief assessment of the Proposal's alignment with the relevant objectives and actions of each policy and/or strategy.

Table 5 – Policy and Strategy Alignment

Legislation / Policy	Relevant Objectives & Actions	Project Alignment
Commonwealth		
Paris Climate Agreement 2016	▪ Strengthen the global response to the threat of climate change. ▪ Maintain global average temperature to well below 2°C above pre-industrial levels and pursue efforts to limit temperature increase to 1.5°C. ▪ Achieve net zero emissions by 2050, and inscribe low emissions technology stretch goals.	▪ The Proposal will contribute to Australia's commitment to the Paris Climate Agreement by supporting the efficacy of nearby wind farms in Portland and allowing more renewable energy projects to connect to the NEM. This is in line with recent Federal announcements regarding a long-term emissions reduction strategy.
Climate Change Act 2022	▪ Advance Australia's response to climate change. ▪ Promote accountability in governance and policy making in regard to climate change. ▪ Achieve Australia's greenhouse gas emissions reduction targets, per section 10 of the Act, at least 43% below 2005 levels by 2030, and net zero by 2050.	▪ The Proposal supports Australia's greenhouse gas reduction targets by storing and distributing new renewable energy that can contribute to the replacement of fossil fuel-based energy. ▪ This Proposal will also help reduce reliance on fossil fuels by enhancing the reliability and stability of renewables, contributing to grid decarbonisation. ▪ The Proposal will also provide construction and maintenance jobs for the local and wider community, helping develop a new employment industry centred on green infrastructure.
Australian Renewable Energy Target Scheme	▪ Reduce greenhouse gas emissions in electricity sector. ▪ Encourage generation of electricity form sustainable and renewable sources. ▪ Investment in new renewable energy projects until the target of 33,000 gigawatt-hours of renewable electricity generation is met and sustained until 2030.	▪ The Proposal supports Australia's renewable energy targets by seeking to reduce greenhouse gas emissions through the storage and distribution of electricity through renewable sources.
Draft AEMO Integrated System Plan 2024	▪ Provide essential support for Australia's energy transition. ▪ Triple grid-scale variable renewable energy by 2030, and increase it seven-fold by 2050. ▪ Quadruple firming capacity to support variable renewable energy.	▪ The Proposal will connect to the NEM at the Heywood Terminal Station and will contribute to grid stability and management. ▪ The Proposal will help improve firming capacity for the NEM as it transitions to variable renewable energy sources.

Legislation / Policy	Relevant Objectives & Actions	Project Alignment
Environmental Protection and Biodiversity Conservation Act 1999	▪ Environmental law that provides environmental protection in relation to Matters of National Environmental Significance (MNES). ▪ Ensures that development avoids or mitigates impacts on biodiversity, particularly on listed species or ecological communities. ▪ To protect threatened species and ecological communities. ▪ To promote ecologically sustainable development. ▪ To enhance Australia's capacity to address environmental challenges.	▪ The Proposal has been intentionally designed and sited to avoid and minimise impacts on flora and fauna, including MNES. ▪ Once completed, targeted Spring surveys will determine whether a referral under the EPBC Act is required,
State		
Aboriginal Heritage Act 2006	▪ To recognise, protect and conserve Aboriginal cultural heritage in Victoria in ways that are based on respect for Aboriginal knowledge and cultural and traditional practices. ▪ To promote the management of Aboriginal cultural heritage as an integral part of land and natural resource management.	▪ The Proposal is located on the traditional lands of the Gunditjmara and the Gunditj Mirring TOAC is the RAP for the land. ▪ The Proposal has been intentionally designed and sited to minimise impacts to areas of designated Cultural Heritage Sensitivity.
Climate Change Act 2017	▪ To set a long-term greenhouse gas emissions reduction target.	▪ The Proposal will directly contribute to the State's stated greenhouse gas emissions reduction targets by supporting the production and dispersion of renewable energy.
Environment Effects Act 1978	▪ If a project is expected to have significant environmental effects, an Environment Effects Statement (EES) may be required to be prepared and submitted to the Minister for assessment of the environmental effects of the works.	▪ The Project does not have significant environmental effects, with a self-assessment completed against EES criteria.
Environment Protection Act 2017	▪ Provides the EPA powers and tools to prevent and minimise the risks of harm to human health and the environment from pollution and waste. ▪ Provides the EPA with the ability to pursue stronger sanctions and penalties to hold environmental offenders to account.	▪ The Proposal is consistent with the purposes of the EP Act. ▪ Assessments are being undertaken to understand how the Proposal may impact the natural environment and health of the surrounding community and mitigation measures will be implemented should impacts be considered unacceptable (refer to Section 7).
Flora and Fauna Guarantee Act 1988	▪ To prevent taxa and communities of flora and fauna from becoming threatened and to recover threatened taxa and communities so their conservation status improves. ▪ To identify and mitigate the impacts of potentially threatening processes to address the important underlying causes of biodiversity decline.	▪ The Proposal requires the removal of some threatened flora species within the Mt Clay Reserve Crown Land. Engagement with DEECA is ongoing. ▪ Through early and ongoing engagement, DEECA acknowledged the efforts to avoid and minimise the impacts on native vegetation and has agreed on a planning strategy that allows the lodgement and assessment of this planning application in advance of targeted spring surveys in inform any Permit to Take requirements. ▪ The planning application is accompanied by a Biodiversity Assessment (refer to Appendix D) which addresses the requirements in the FFG Act.
Heritage Act 2017	▪ To protect and conserve the cultural heritage of the state. ▪ To create offences and other enforcement measures to protect and conserve cultural heritage.	▪ The Proposal is generally consistent with the objectives of the Act as it would not disturb any places of European heritage.

Legislation / Policy	Relevant Objectives & Actions	Project Alignment
Planning and Environment Act 1987	▪ To establish a framework for planning the use, development and protection of land in Victoria. ▪ Provides legal weight to instruments under the Act, including the Victorian Planning Provisions, planning schemes (such as the Glenelg Shire Planning Scheme), regulations and Ministerial directions.	▪ The Proposal is in accordance with the general objectives for planning and land use within Victoria ▪ It has been selected for its strategic location, in close proximity to existing electrical infrastructure and renewable energy facilities ▪ Planning approval from the Minister for Planning is being sought as part of this application. A detailed assessment against the relevant provisions of the Glenelg Planning Scheme has been provided at Section 6.
Renewable Energy (Jobs and Investment) Act 2017 & Victorian Renewable Energy Target (VRET)	▪ To increase the proportion of Victoria's electricity generated by the means of large-scale facilities that utilise renewable energy sources. ▪ To contribute to achieving the renewable energy targets, and energy storage targets. ▪ To support the development of projects and initiatives to encourage investment, employment and technology development in Victoria in relation to renewable electricity generation, and energy storage. ▪ To contribute to the reduction of greenhouse gas emissions in Victoria and to achieve associated environmental and social benefits. ▪ To promote the transition of Victoria to a clean energy economy. ▪ To contribute to the security of electricity supply in Victoria.	▪ The proposed BESS will be key to achieving Victoria's ambitious energy storage targets of at least 2.6 GW by 2030. ▪ The battery storage capacity of the Proposal supports the Victorian Government's goals of providing reliable, affordable and clean energy. ▪ The Proposal will also contribute to Victoria's renewable energy targets by allowing more renewable energy generators to connect to the grid.
Road Management Act 2004	▪ To establish a system for the management of safe and efficient public roads that best meet the needs and priorities of State and local communities.	▪ The planning application is accompanied by a Transport Assessment (refer to Section 7.3), that outlines the proposed strategies for road management. The proposal is consistent with the road management principles outlined in the *Road Management Act 2004*.
Dangerous Goods Act 1985	▪ To promote the safety of persons and property in relation to the manufacture, storage, transport, transfer, sale and use of dangerous goods. ▪ To ensure that adequate protections are taken against certain fires, explosions, leakages and spillages of dangerous goods. ▪ To ensure that information relating to dangerous goods is provided by occupiers and owners of premises to the relevant authorities. ▪ To allocate responsibilities to occupiers and owners of premises to ensure that the health and safety of workers and the general public is protected.	▪ The planning application is accompanied by a Risk Management Plan (refer to Section 7.6), that assesses the hazard associated with the Proposal. ▪ Atmos has extensive experience in the development of grid-scale battery storage systems that commonly utilise LFP call technology and are familiar with the associated dangerous goods and hazards handling processes in the respective states and territories they have worked in. ▪ Elements of the Proposal classified as Dangerous Goods will be listed within the site's Dangerous Goods register. Maintenance programs will be enacted to ensure all elements containing Dangerous Goods will be maintained in accordance with manufacturer specifications and relevant Australian Standards.
Victoria's Climate Change Strategy	▪ Transition the state to a clean energy future, promote the creation of clean energy jobs and strengthen the energy system. ▪ Invest in innovative technologies. ▪ Reduce greenhouse gas emissions levels by 28-33% from 2005 levels by 2025 and 45-50% by 2030.	▪ The Proposal will help support the State's transition to a clean energy future by providing critical storage and dispersion of renewable-generated electricity. ▪ The Project will contribute to the State's emissions reduction targets by allowing a greater mix of renewable energy in the electricity grid and storing energy that would otherwise be generated through fossil fuel sources. ▪ The Proposal will utilise the latest LFP cell battery technology which is constantly adapting and innovating to meet best practice standards.

Legislation / Policy	Relevant Objectives & Actions	Project Alignment
Design Guidelines and Model Requirements for Renewable Energy Facilities (Country Fire Authority) 2022	▪ Provides standard considerations and measures in relation to fire safety, risk and emergency management to be considered when designed and operating new renewable energy facilities. ▪ Provides design guidelines for battery facilities in bushfire prone areas.	▪ The planning application is accompanied by a Fire Hazard and Risk Assessment (refer to Section 7.6), that assesses the Proposal against the CFA Guidelines. ▪ The CFA have been and will continue to be consulted during the design, construction and operation phases.
Regional		
Great South Coast Regional Growth Plan	▪ Support the development of energy facilities in appropriate locations where they take advantage of existing infrastructure and provide benefits to the regional community. ▪ Require the protection and proper maintenance of infrastructure and assets, including local roads, during the development and construction of energy projects. ▪ Plan for and sustainably manage the cumulative impacts of alternative energy development. ▪ Support continued development of the energy industry.	▪ The Proposal is appropriately located away from Heywood residential areas and near existing electrical infrastructure. ▪ Atmos is a leading renewable energy company and has deep experience maintaining and operating renewable and clean energy infrastructure across Australia. ▪ The Project supports existing and future alternative energy development in the region and helps to develop the local energy industry.
The Great South Coast Regional Strategic Plan	▪ Meet the future labour and skill demands of current and emerging industries. ▪ Invest in renewable energy development and position ourselves to become Australia's alternative energy centre. ▪ Invest in renewable energy knowledge and skills development. ▪ Reduce community and industry consumption of non-renewable resources.	▪ The Proposal will support future investment in renewable energy development by providing opportunities to upskill the local labour force and increasing demand within the local manufacturing industry for manufactured goods in the construction of the Proposal. ▪ The Proposal will help reduce the consumption of non-renewable resources by increasing the share of renewably generated electricity in the grid.
Local		
Glenelg Shire 2040 Community Plan	▪ Our Natural Environment priority - Work together to address and mitigate the effects of climate change. ▪ Our Industry, Education and Employment priority - Encourage diverse employment opportunities. ▪ Glenelg Central - Job growth through innovation, consideration of potential for renewable energy and recycling schemes.	▪ The Proposal will help Heywood mitigate the effects of climate change by increasing the availability of renewable energy and reducing the dependence on fossil fuel-based electricity. ▪ The Proposal will create jobs and training opportunities in the renewable energy sector helping to diversify the skill base in Heywood and surrounds.

6. Planning assessment

The Site is subject to the Glenelg Planning Scheme (Planning Scheme), that outlines a range of State, Regional and Local policies, along with detailed planning provisions, that direct future use and development of the site. Table 6 presents identified planning permit triggers under the Planning Scheme.

Table 6 – Planning permit triggers

Clause	Trigger
Clause 35.07-1 **Farming Zone 1**	Use of land for a utility installation (BESS)
Clause 35.07-7 **Farming Zone 1**	To construct a building or carry out works associated with a Section 2 use.
Clause 36.01-1 **Public Use Zone 1**	Use of land for a utility installation (BESS)
Clause 36.01-2 **Public Use Zone 1**	To construct a building or carry out works associated with a Section 2 use.
Clause 36.03-1 **Public Conservation and Resource Zone**	Use of land for a utility installation (BESS)
Clause 36.03-2 **Public Conservation and Resource Zone**	To construct a building or carry out works.
Clause 52.06-6 **Car Parking**	To provide car parking.
Clause 52.17-1 **Native vegetation**	To remove, destroy or lop native vegetation, including dead native vegetation.

6.1 Clause 02 Municipal Planning Strategy (MPS)

The Municipal Planning Strategy (MPS) is provided at Clause 02 of the Planning Scheme and provides the context, vision and strategic directions of Glenelg Shire Council. Relevant Clauses include:

- Clause 02.01 – Context – This clause provides an overview of the current social, economic and environmental context of the municipality
- Clause 02.02 – Vision – This clause sets out the vision for the municipality in line with the Council Plan
- Clause 02.03 – Strategic Directions – This clause provides the strategic direction for the municipality in line with strategic framework plans at Clause 02.04.

The MPS contains a Strategic Framework Plan that, in relation to the Site, indicates a high voltage powerline crosses through the Site and that Mount Clay State Forest is Crown Land.

Table 7 sets out the strategic direction sub-clauses and provisions relevant to the Proposal and an assessment against them.

Table 7 – Relevant Strategic Directions and Assessment

Sub-Clause	Relevant Provisions	Assessment
Clause 02.03-1 **Settlement**	▪ Securing the economic future of Portland, Heywood, Casterton, Dartmoor and Nelson by broadening their employment base.	▪ The Proposal contributes to the growing renewable energy sector that is predominantly centred around Portland. ▪ Located in Heywood, the Proposal will create new employment opportunities within the renewables sector to help broaden the local employment base.
Clause 02.03-2 **Environmental and landscape values**	▪ Manage biodiversity within the municipality by protecting native vegetation and retaining habitats for native fauna.	▪ The Proposal has been sited to avoid and minimise the removal of native vegetation and impacts to biodiversity within the Mount Clay State Forest area.

	▪ Protect the Shire's significant landscapes, waterways, wetlands, woodlands and natural environments, including the World Heritage listed Budj Bim Cultural Landscape.	▪ A biodiversity assessment has been prepared to inform the design development and assessment of the Proposal.
Clause 02.03-3 Environmental risks and amenity	▪ Manage bushfire risk by discouraging development in areas prone to bushfire risk and supporting planning and development considerations that minimise the impact of fire.	▪ The Proposal has been considerate to the *Design Guidelines and Model Requirements: Renewable Energy Facilities* (CFA, 2023) and is supported by a Fire Hazard and Risk Assessment.
Clause 02.03-6 Employment and industry	▪ Promote employment and industrial growth by supporting use and development that increases employment in the Shire particularly in Glenelg's key employment/industry sectors. ▪ Renewable energy is highlighted as one of the key industry sectors in the Shire.	▪ The Proposal will create job and manufacturing opportunities in the renewable energy sector, one of the Shire's key industry sections.

Assessment

The Project aligns with the MPS, including the vision of Glenelg Shire, by minimising environmental impacts to protect the natural environment, preparing Glenelg Shire for the impacts of climate change, and growing the municipality's renewable energy and storage economy.

6.2 Planning Policy Framework

The Planning Policy Framework (PPF) sets out the objectives and strategies that guide land use and development within the municipality. Table 8 sets out the relevant PPF Clause objectives and strategies and provides an assessment against them.

Table 8 – Relevant PPF Objectives, Strategies and Assessment

Clause	Relevant Provisions	Assessment
Clause 12 Environmental and Landscape Values		

Clause 12.01-1S
Protection of biodiversity
	▪ Ensure that decision making takes into account the impacts of land use and development on Victoria's biodiversity, including consideration of:
	  ▪ Cumulative impacts.
	  ▪ Fragmentation of habitat.
	  ▪ The spread of pest plants, animals and pathogens into natural ecosystems.
	▪ Avoid impacts of land use and development on important areas of biodiversity.
		▪ The Proposal has been intentionally sited on previously disturbed agricultural land to minimise biodiversity impacts.
		▪ The primary parcel is currently used for grazing and is largely devoid of significant ecological values.
		▪ The transmission corridor is located within the existing cleared transmission easement to minimise impacts to biodiversity in Mount Clay State Forest.
		▪ See Appendix D and Section 7.1 for further detail.

Clause 12.01-1L Protection of biodiversity	▪ Retain eucalypt trees, in particular Red Gum, Brown Stringybark, and Desert Stringybark, as a significant environmental and landscape asset which contributes to the survival of the endangered red-tailed black cockatoo (RtBC).	▪ The Proposal has been informed by ecological and arboricultural assessments that have successfully avoided impacts to RtBC-relevant trees, including a dead hollow-bearing tree at the primary access point.

Clause 12.01-2S
Native vegetation management
	▪ Ensure decisions that involve, or will lead to, the removal, destruction or lopping of native vegetation, apply the three-step approach in accordance with the Guidelines for the removal, destruction or lopping of native vegetation (Department of Environment, Land, Water and Planning, 2017).
	  ▪ Avoid the removal, destruction or lopping of native vegetation.
	  ▪ Minimise impacts from the removal, destruction or lopping of native vegetation that cannot be avoided.
	  ▪ Provide an offset to compensate for the biodiversity impact from the removal, destruction or lopping of native vegetation.
		▪ The Proposal has undergone numerous design iterations to avoid and minimise potential environmental impacts.
		▪ The Proposal fully avoids native vegetation on the primary parcel.
		▪ Initially, the transmission corridor was located outside the existing easement which would have resulted in significant impacts to native vegetation.
		▪ The Proponent successfully negotiated with AusNet to locate the Proposal's transmission corridor within the easement, designed with sufficient space around trees to avoid tree loss via direct lopping or TPZ impacts.
		▪ An avoid, minimise and mitigate statement is included in Appendix D.

Clause 12.05-2S Landscapes	▪ Ensure significant landscape areas such as forests, the bays and coastlines are protected.	▪ The transmission corridor is located within the existing transmission easement to protect the landscape of Mount Clay State Forest and avoid the removal of canopy trees. ▪ The Proposal avoids indigenous vegetation along roadsides and avoids TPZ to protect canopy trees.
Clause 12.05-2L Landscapes	▪ Protect indigenous vegetation along roadsides, coastal edges, waterways, wetlands, estuaries, hill slopes, and other viewing corridors. ▪ Design and site structures to minimise the loss of canopy trees and understorey vegetation.	
Clause 13 Environmental Risks and Amenity		
Clause 13.01-1S Natural hazards and climate change	▪ Respond to the risks associated with climate change in planning and management decision making processes. ▪ Develop adaptation response strategies for existing settlements in risk areas to accommodate change over time. ▪ Site and design development to minimise risk to life, health, property, the natural environment and community infrastructure from natural hazards.	▪ The Proposal will provide a flexible and reliable energy storage solution that can readily respond to fluctuating energy demands and renewable energy generation. By storing excess energy during periods of low demand and releasing it during peak demand periods, the Proposal would help mitigate the impacts of extreme weather events of the electrical grid and enhance energy resilience. ▪ By decentralising energy storage and reducing dependence on centralised power plants, the Proposal would allow for more flexible and sustainable growth patterns, particularly in areas more vulnerable to climate-related hazards. ▪ The Proposal is sited and designed according to rigorous standards to minimise risk to life and the environment.

Clause 13.02-1S
Bushfire
	▪ Identify bushfire hazard and undertake appropriate risk assessment by:
	  ▪ Applying the best available science to identify vegetation, topographic and climatic conditions that create a bushfire hazard.
	  ▪ Consulting with emergency management agencies and the relevant fire authority early in the process to receive their recommendations and implement appropriate bushfire protection measures.
		▪ The Proposal has been designed in accordance with the *Country Fire Authority's Design Guidelines Model Requirements Renewable Energy Facilities* (March 2022) and includes mandatory bushfire safety design elements such as perimeter fire breaks, access roads for emergency vehicles, adequate water access and associated fire protection and suppression systems.
		▪ Extensive consultation has been undertaken with the Country Fire Authority to inform the Proposal's design including battery and inverter placement with respect to emergency management access, fire suppression systems, and proximity Mount Clay State Forest.
		▪ A Risk Management Plan (Appendix H) has been prepared and informed the design of the Proposal and fire mitigation measures.

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. ▪ Minimise the impact on human health from noise exposure to occupants of sensitive land uses (residential use, child care centre, school, education centre, residential aged care centre or hospital) near the transport system and other noise emission sources through suitable building siting and design (including orientation and internal layout), urban design and land use separation techniques as appropriate to the land use functions and character of the area.	▪ The Proposal is a considered a noise emitting development and has been adequately separated from sensitive land uses. ▪ A noise assessment (Appendix E) has been prepared and informed the layout of the Proposal and requirement of any noise mitigation measures. Noise emitting elements have been setback from dwellings towards the south of the primary parcel, as much as possible.
Clause 13.07-1S Land use compatibility	▪ Ensure that use or development of land is compatible with adjoining and nearby land uses. ▪ Avoid locating incompatible uses in areas that may be impacted by adverse off-site impacts from commercial, industrial and other uses.	▪ The Proposal has been located on land that currently hosts electricity infrastructure to avoid land use compatibility conflicts. ▪ The Proposal has been sited and designed to minimise adverse off-site impacts and meet relevant noise limits by ensuring

	▪ Avoid or otherwise minimise adverse off-site impacts from commercial, industrial and other uses through land use separation, siting, building design and operational measures.	appropriate separation distance and mitigation measures (see Appendix E).
Clause 14 Natural Resource Management		
Clause 14.01-1S Protection of agricultural land	▪ Avoid permanent removal of productive agricultural land from the state's agricultural base without consideration of the economic importance of the land for the agricultural production and processing sectors.	▪ The Proposal is located on agricultural land (FZ1). ▪ An Agricultural Impact Assessment (Appendix J) has been prepared and confirms the site is not considered significant agricultural land. ▪ The BESS footprint does not cover the entirety of site, leaving the option open for the balance portion of land to continue use as grazing land.
Clause 14.02-2S Water quality	▪ Ensure that land use activities potentially discharging contaminated runoff or wastes to waterways are sited and managed to minimise such discharges and to protect the quality of surface water and groundwater resources, rivers, streams, wetlands, estuaries and marine environments.	▪ The Proposal includes a large drainage retention pond to ensure there is no increase in rate or volume of water runoff leaving the site and impacting groundwater resources and nearby wetlands. ▪ In the event of contaminated water, the water can be held in the retention pond for proper management.
Clause 15 Built Environment & Heritage		
Clause 15.01-6S Design for rural areas	▪ Ensure that the siting, scale and appearance of development protects and enhances rural character. ▪ Site and design development to minimise visual impacts on surrounding natural scenery and landscape features including ridgelines, hill tops, waterways, lakes and wetlands.	▪ The Proposal is located adjacent to a substation and other electricity infrastructure to help minimise non-natural visual impacts to the surrounding landscape. ▪ A landscape and visual impact assessment (Appendix G) has been prepared to further assess this impact and inform mitigation measures.
Clause 15.03-2S Aboriginal cultural heritage	▪ Identify, assess and document places of Aboriginal cultural heritage significance, in consultation with relevant Registered Aboriginal Parties, as a basis for their inclusion in the planning scheme. ▪ Provide for the protection and conservation of pre-contact and post-contact Aboriginal cultural heritage places. ▪ Ensure that permit approvals align with the recommendations of any relevant Cultural Heritage Management Plan approved under the Aboriginal Heritage Act 2006.	▪ A CHMP is being prepared and will inform the detailed design stage of the Proposal to ensure places of Aboriginal cultural heritage significance are avoided and protected. ▪ See Section 7.2 for further details.
Clause 17 Economic Development		
Clause 17.01-1S Diversified economy	▪ Facilitate growth in a range of employment sectors, including health, education, retail, tourism, knowledge industries and professional and technical services based on the emerging and existing strengths of each region. ▪ Support rural economies to grow and diversify.	▪ The Proposal would help to facilitate growth in a new and innovative employment sector, thereby supporting rural economies to grow and diversify.
Clause 19 Infrastructure		
Clause 19.01-1S Energy supply	▪ Support the development of energy generation, storage, transmission, and distribution infrastructure to transition to a low-carbon economy. ▪ Develop appropriate infrastructure to meet community demand for energy services. ▪ Ensure energy generation, storage, transmission and distribution infrastructure and projects are resilient to the impacts of climate change. ▪ Facilitate the production and distribution of zero emission gases and fuels.	▪ The Proposal directly supports this clause by providing storage to assist in the transition to a low carbon economy. It would also facilitate energy infrastructure development in an appropriate location. It takes advantage of existing infrastructure, provides benefits to industry and the community, supports the transition to a low-carbon economy with renewable energy and greenhouse emission reductions, helps diversify the local

	▪ Support energy infrastructure projects in locations that minimise land use conflicts and that take advantage of existing resources and infrastructure networks. ▪ Facilitate energy infrastructure projects that help diversify local economies and improve sustainability and social outcomes.	economy and improve sustainability and social outcomes.
Clause 19.01-2S Renewable Energy	▪ Facilitate renewable energy development in appropriate locations. ▪ Consider the economic, social and environmental benefits to the broader community of renewable energy generation while also considering the need to minimise the effects of a proposal on the local community and environment.	

6.3 Zones and overlays

The primary parcel is located within the Farming Zone – Schedule 1 (FZ1).

The transmission corridor to the Heywood Terminal Station is located within both the Public Conservation and Resource Zone (PCRZ) and Public Use Zone (PUZ1) (Figure 12).

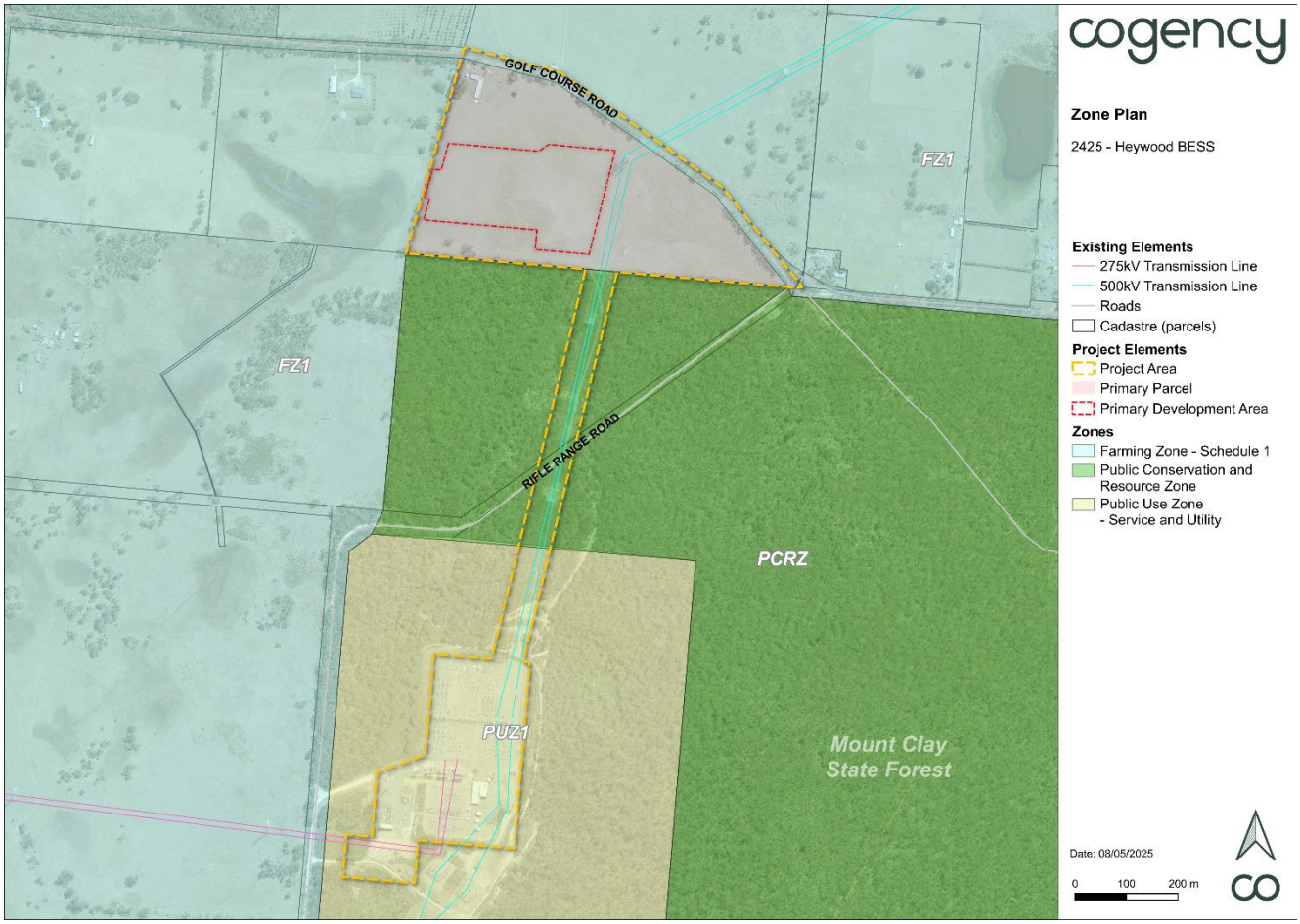


Figure 12 – Zone Plan

6.3.1 Clause 35.07 Farming Zone (FZ1)

The purpose of the Farming Zone is:

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

Clause 73.03 (Land Use Terms) of the Planning Scheme defines 'utility installation' as 'land used to transmit, distribute or store power'. As a result, the most appropriate definition of the Proposal is a 'utility installation'.

Permit triggers in the FZ1 applying to the Project are:

- Pursuant to Clause 35.07-1 (Table of uses), 'utility installation' is a Section 2 – Permit required use.
- Pursuant to Clause 35.07-4 (Buildings and works), a permit is required to construct or carry out buildings or works associated with a Section 2 use.
- Clause 35.07-6 (Decision guidelines) sets out the guidelines for the Responsible Authority to consider before deciding on an application, these have been set out and responded to in Table 9.
- Pursuant to Schedule 1 to Clause 35.07, a permit is required for earthworks which change the rate of flow or the discharge point of water across a property boundary or which increase the discharge of saline groundwater.

Table 9 provides an assessment against the relevant decision guidelines within the FZ1.

Table 9 – Farming Zone Decision Guidelines and Assessment

Decision Guidelines	Assessment
General issues: 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 Proposal is appropriately located on land that is capable of accommodating the proposed use of a utility installation. ▪ The Site is particularly suitable for the proposed use given the proximity to existing infrastructure and distance from sensitive receptors. ▪ No Regional Catchment Strategy applies to the land.
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 Proposal would result in the net loss of approximately 12ha of agricultural land. Given the low agricultural potential of the land and the relatively small footprint of development, this loss of agricultural land is considered to be acceptable. ▪ The Proposal would not limit the operations of adjoining and nearby properties.

▪ 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.	
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 Proposal avoids all areas of native vegetation on the primary parcel and is located within a cleared transmission easement to minimise impacts to biodiversity within Mount Clay State Forest. ▪ The Proposal includes a retention pond to ensure there is no increase in rate or volume of water runoff leaving the site and impacting groundwater resources and nearby wetlands. ▪ In the event of contaminated water, the water can be held in the retention pond for proper management. ▪ See Appendix D and Section 7.1 for further details.
Design and siting issues: ▪ The need to locate buildings in one area to avoid any adverse impacts on surrounding agricultural uses and to minimise the loss of productive agricultural land. ▪ The impact of the siting, design, height, bulk, colours and materials to be used, on the natural environment, major roads, vistas and water features and the measures to be undertaken to minimise any adverse impacts. ▪ The impact on the character and appearance of the area or features of architectural, historic or scientific significance or of natural scenic beauty or importance. ▪ The 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 Proposal has been designed and sited to occupy the smallest footprint, minimising the loss of agricultural land and avoiding existing transmission infrastructure. ▪ By collocating the Proposal on land with existing electrical infrastructure, the BESS and ancillary infrastructure will not present a significant change to the visual landscape. ▪ The materials and finishes of the proposed BESS will not present a significant additional visual impact ▪ Proposed vegetation screening and retaining roadside trees will reduce the visual impact of the BESS to the existing landscape. See Appendix G and Section 7.4 for further details. ▪ Construction activities will require traffic management measures. More details can be found in the Transport Impact Assessment.

6.3.2 Clause 36.01 Public Use Zone (PUZ1)

The purpose of the Public Use Zone is to recognise public land use for public utility and community services and facilities and to provide for associated uses that are consistent with the intent of the public land reservation or purpose.

Pursuant to Clause 36.01-1 (Table of uses), 'any other use' is a Section 1 – Permit not required use if the following conditions are met:

- The use must be for the purpose described in the table to Clause 36.01-6 which corresponds to the notation on the planning scheme map.
- The use must be carried out by or on behalf of the public land manager.

A 'utility installation' meets the 'service and utility' public land use condition, however the Proposal does not meet the second condition. Therefore, the Proposal becomes a Section 2 – Permit required use.

Pursuant to Clause 36.01-2 (Buildings and works), a permit is required to construct or carry out buildings or works associated with a Section 2 use.

Pursuant to Clause 36.01-3 (Application requirements), an application for a permit by a person other than the relevant public land manager must be accompanied by the written consent of the public land manager. The Proposal has obtained written consent of the public land manager of the Heywood Terminal Station (DEECA) (Appendix C).

Clause 36.01-4 (Decision guidelines) sets out the guidelines for the Responsible Authority to consider before deciding on an application, these have been set out and responded to in Table 10.

Table 10 – Public Use Zone 1 decision guidelines and assessment

Application requirements	Assessment
▪ The comments of any Minister or public land manager having responsibility for the care or management of the land or adjacent land. ▪ Whether the development is appropriately located and designed, including in accordance with any relevant use, design or siting guidelines.	▪ The Proposal has considered the *Design Guidelines and Model Requirements: Renewable Energy Facilities* (CFA, 2023) through the siting of the BESS, incorporating appropriate buffers to Mount Clay State Forest. ▪ The proposed use as Utility suits the purpose of the zone. ▪ Public Land Manager consent has been granted, and the application will be assessed by relevant departments as part of the planning referral process, to inform Landowner Consent (that has been lodged separately).

6.3.3 Clause 36.03 Public Conservation and Resource Zone (PCRZ)

The proposed transmission corridor is located on approximately 0.8 ha of land within Mount Clay State Forest which is located within a Public Conservation and Resource Zone (PCRZ) (Figure 12).

The purpose of the Public Conservation and Resource Zone is to:

- Protect and conserve the natural environment and natural processes for their historic, scientific, landscape, habitat or cultural values.
- Provide facilities which assist in public education and interpretation of the natural environment with minimal degradation of the natural environment or natural processes.
- Provide for appropriate resource-based uses.

Pursuant to Clause 36.03-1 (Table of uses), a 'utility installation' is a Section 1 – Permit not required use if either of the following conditions are met:

- A use conducted by or on behalf of a public land manager, Parks Victoria or the Great Ocean Road Coast and Parks Authority, under the relevant provisions of the Local Government Act 2020, the Reference Areas Act 1978, the National Parks Act 1975, the Fisheries Act 1995, the Wildlife Act 1975, the Forests Act 1958, the Water Industry Act 1994, the Water Act 1989, the Marine Safety Act 2010, the Port Management Act 1995 or the Crown Land (Reserves) Act 1978.
- Specified in an Incorporated plan in a schedule to this zone.

The Proposal does not meet either condition, therefore a 'utility installation' becomes a Section 2 – Permit required use.

Pursuant to Clause 36.03-2 (Permit requirement), a permit is required to construct a building or construct or carry out works.

Pursuant to Clause 36.03-3 (Application requirements), an application for a permit by a person other than the relevant public land manager must be accompanied by the written consent of the public land manager. The Project has obtained written consent of the public land manager of Mount Clay State Forest (DEECA) (Appendix C).

Clause 36.03-6 (Decision guidelines) sets out the guidelines for the Responsible Authority to consider before deciding on an application, these have been set out and responded to in Table 9.

Table 11 – Public Conservation and Resource Zone decision guidelines and assessment

Application requirements	Response
▪ The comments of any public land manager or other relevant land manager having responsibility for the care or management of the land or adjacent land. ▪ Whether the development is appropriately located and designed, including in accordance with any relevant use, design or siting guidelines.	▪ The Proposal has considered the *Design Guidelines and Model Requirements: Renewable Energy Facilities* (CFA, 2023) through the siting of the BESS, incorporating appropriate buffers to Mount Clay State Forest. ▪ Public Land Manager consent has been granted, and the application will be assessed by relevant departments as part of the planning referral process, to inform Landowner Consent (that has been lodged separately).

6.3.4 Clause 42.01 Environmental Significance Overlay (ESO3)

The entire Site is covered by the Environmental Significance Overlay – Schedule 3 (ESO3) (Figure 13).

The purpose of the Environmental Significance Overlay is:

- To identify areas where the development of land may be affected by environmental constraints.
- To ensure that development is compatible with identified environmental values.

Schedule 3 to Clause 42.01 (ESO) seeks to protect and conserve the critical habitat of the endangered South-eastern Red-tailed Black Cockatoo through the retention of live and dead hollow bearing trees within the bird's range and the retention of Brown Stringybark and Desert Stringybark trees within the bird's known feeding area. ESO3 expands on the permit requirements and decision guidelines specific to the protection of South-eastern Red-tailed Black Cockatoo habitat.

Pursuant to Section 3.0 (Permit requirement) a permit is not required because the Proposal does not impact any trees specifically protected under the ESO3, including:

- A dead, hollow-bearing Eucalyptus tree with a trunk diameter greater than 40 centimetres at 1.3 metres above ground level.
- A hollow bearing eucalypt tree (live).
- Brown Stringybark Eucalyptus baxteri or Desert Stringybark Eucalyptus arenacea with a trunk diameter of greater than 30 centimetres at 1.3 metre above ground level (live).

It is noted that the Proponent has specifically worked with AusNet to ensure that the cable construction corridor does not result in tree loss.

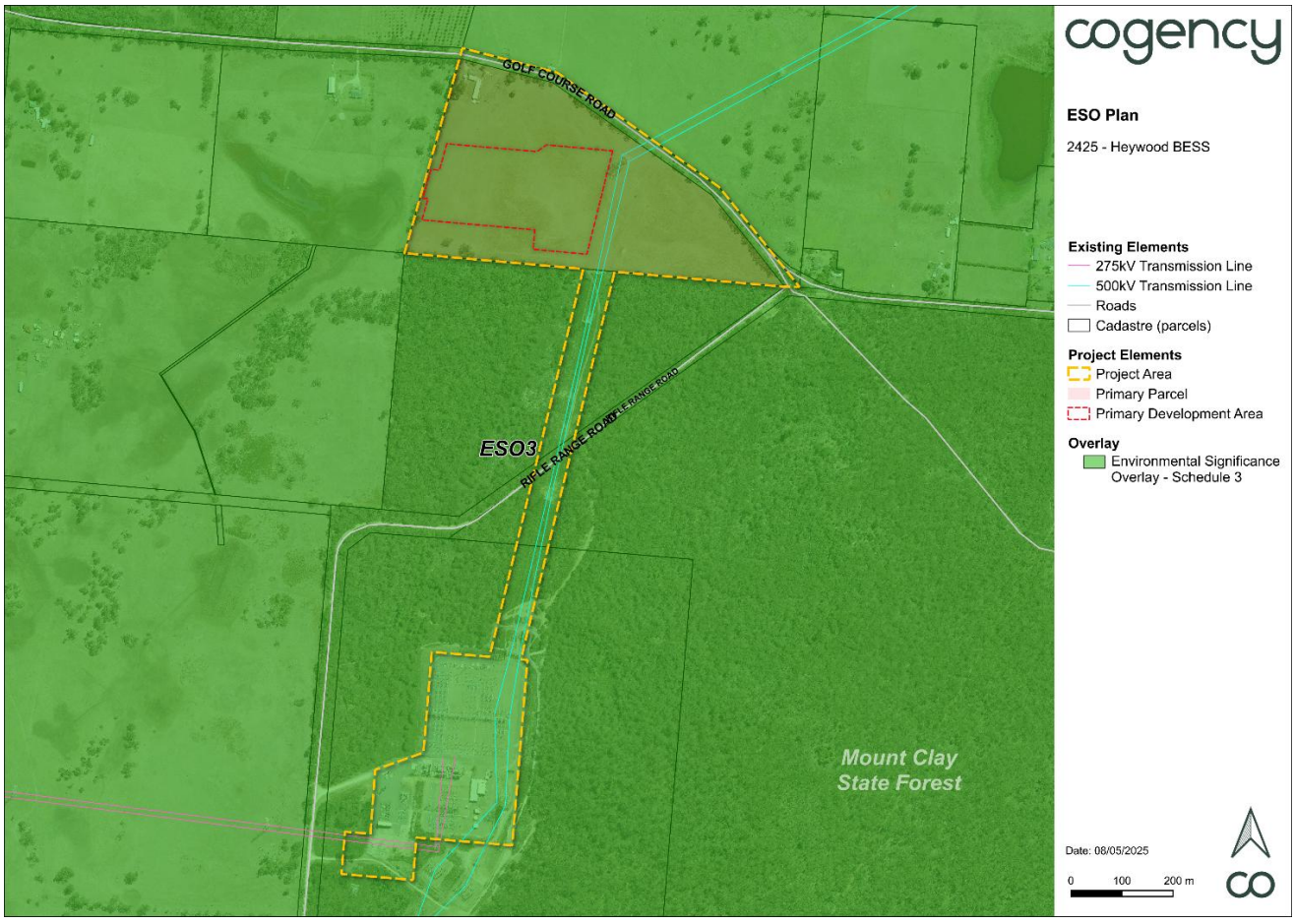


Figure 13 – ESO plan

6.3.5 Clause 44.06 Bushfire Management Overlay (BMO)

Part of the Site in included within the Bushfire Management Overlay (BMO) under the Glenelg Planning Scheme, refer to Figure 14.

The purpose of the Bushfire Management Overlay is:

- To ensure that the development of land prioritises the protection of human life and strengthens community resilience to bushfire.
- To identify areas where the bushfire hazard warrants bushfire protection measures to be implemented.
- To ensure development is only permitted where the risk to life and property from bushfire can be reduced to an acceptable level.

Pursuant to Clause 44.06-2 (Permit requirement), a permit is not required to construct a building or construct or carry out works associated with a 'utility installation'.

The site is also wholly located within the mapped 'Bushfire Prone Area'.

The layout of the Proposal must consider the Design Guidelines and Model Requirements: Renewable Energy Facilities 2023 and feedback from the relevant emergency services authority (CFA). The planning application is accompanied by a Risk Management Plan (see Appendix H), that concludes the Proposal meets the guidelines.

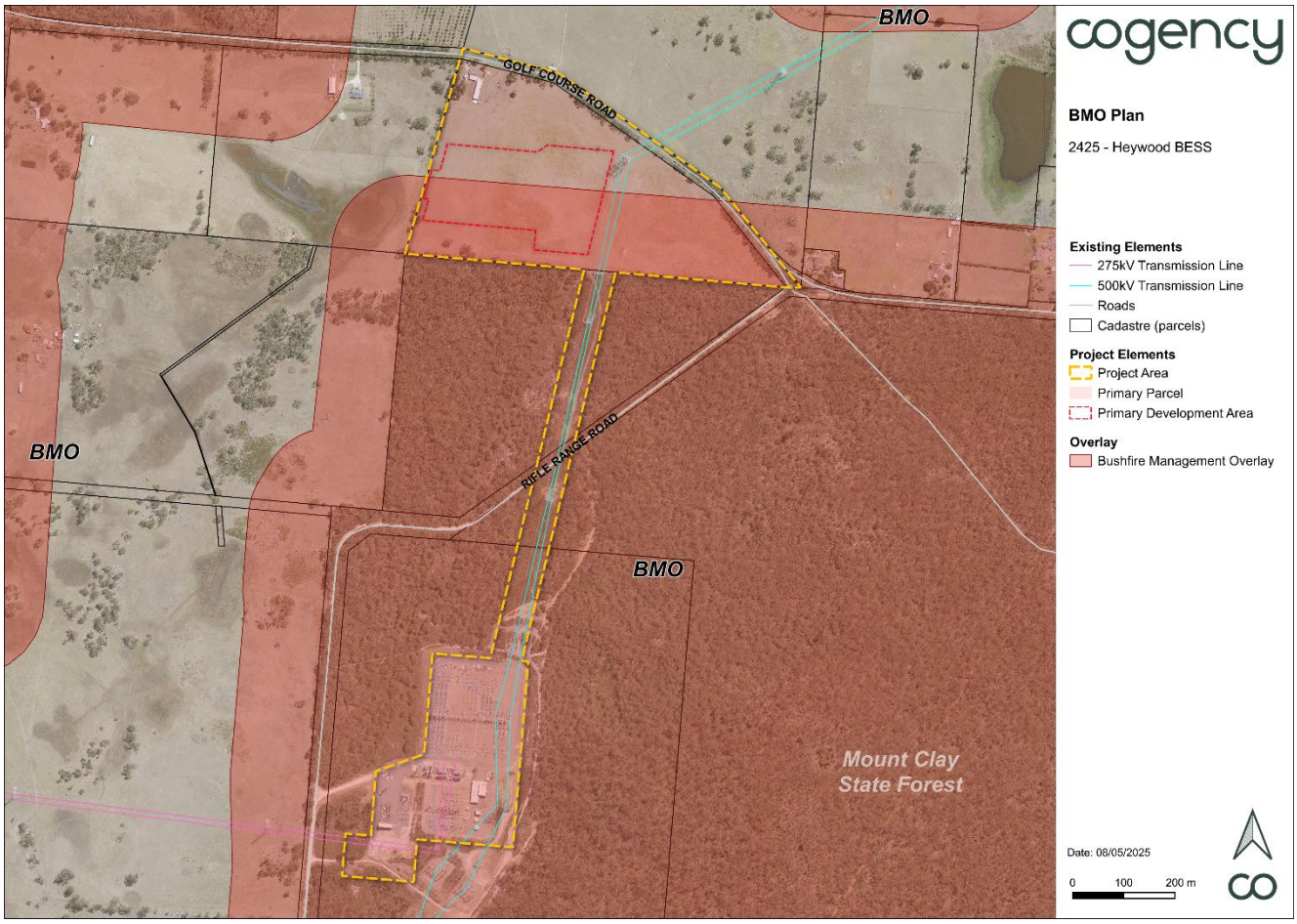


Figure 14 – BMO plan

6.4 Particular Provisions

Particular provisions are planning controls that apply only to certain uses and development or to particular aspects of certain uses and development. The following Particular Provisions of the Latrobe Planning Scheme are considered relevant to the Proposal. Their purposes, permit triggers, application requirements, referrals, and decision guidelines are considered in below.

Table 12 – Particular Provisions

Particular Provision	Planning Permit Requirements	Assessment
Clause 52.06 Car Parking	Car parking must be provided to the satisfaction of the responsible authority (Clause 52.06-6).	▪ Car parking for operation and construction staff will be provided onsite. ▪ Given the large area of the overall site and the position of the BESS units in the western portion of the site, all car parking demands are expected to be comfortably accommodated on-site.
Clause 52.17 Native Vegetation	A planning permit is required to remove, destroy or lop native vegetation, including dead native vegetation (Clause 52.17-1). An application to remove, destroy or lop native vegetation must comply with the application requirements specified in the Guidelines for the removal, destruction or lopping of native vegetation (Department of Environment, Land, Water and Planning, 2017).	▪ A Biodiversity Assessment (Appendix D) has been undertaken which identifies where native vegetation is located within the site. ▪ The amount of native vegetation removal is anticipated to be a maximum of 0.775ha within the transmission corridor. ▪ Notably, the design ensures no tree loss (direct lopping or impacts, or impacts to more than 10% of a TPZ).
Clause 53.22 Significant Economic Development	An application is exempt from the decision requirements of section 64(1), (2) and (3) and the review rights of section 82(1) of the P&E Act (Clause 53.22-4).	▪ This application is made under Clause 53.22, exempting the application from the review rights of section 82(1).

6.5 General Provisions

The following General Provisions of the Planning Scheme are considered relevant to the Proposal, among other more general provisions. Broadly, General Provisions set out exemptions, decision guidelines, and referral and notice provisions.

Table 13 – Referral requirements

General Provision	Planning Permit Requirements	Assessment
Clause 66.02-2 Native vegetation	The Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the Conservation, Forests and Lands Act 1987) is a recommending referral authority for an application to remove, destroy or lop native vegetation in the Detailed Assessment Pathway as defined in the Guidelines for the removal, destruction or lopping of native vegetation (Department of Environment, Land, Water and Planning, 2017).	This application will be referred to the Secretary to the Department of Environment, Land, Water and Planning.
Clause 66.02-4 Major electricity line or easement	The electricity transmission authority is a determining referral authority for an application to construct a building or construct or carry out works on land within 60 metres of a major electricity transmission line (220 Kilovolts or more) or an electricity transmission easement.	This application will be referred to the electricity transmission authority. It is noted that Atmos has and continues to consult with AusNet (the electricity transmission authority) in relation to the proposed connection to the Heywood Terminal Station.

Clause 66.02-7 **Industry, utility or warehouse**	The Victorian WorkCover Authority is a determining referral authority to use land for a utility installation if the fire protection quantity is exceeded under the Dangerous Goods (Storage and Handling) Regulation 2012.	This application will be referred to the Victorian WorkCover Authority.

7. Technical impact assessment and mitigation measures

To inform the design and planning of this Proposal, a range of specialist technical assessments have been undertaken. These cover various topics and include contextual site assessments, describe potential impacts, and inform the design and measures required to avoid, minimise or mitigate those impacts. The site context and characteristics relevant to each technical assessment, as well as proposed impact mitigation measures, are summarised in the following sections of this chapter. The full technical reports are attached as appendices to this report.

7.1 Biodiversity

A Biodiversity Assessment was completed by Ecolink Consulting Pty Ltd, provided at Appendix D. The assessment was undertaken to determine the ecological constraints of the Site and to inform the design development process. Broadly, the assessment found that the primary parcel mostly consisted of pastures comprising exotic grasses and environmental weeds, with a few areas of indigenous vegetation comprising of small patches and scattered trees with little to no understorey beneath. Within the existing transmission easement in Mount Clay State Reserve, large trees have been removed. Vegetation within the easement consisted completely of midstorey and understorey. Vegetation near the Heywood Terminal Station was fragmented by several tracks and had a slightly lower diversity of plants and higher invasion of weeds.

The assessment found that there is potential for the presence of threatened flora species and generally protected flora species underneath the powerline easement. A targeted survey will be undertaken in Spring to ascertain presence of these species and inform a 'permit to take' under the FFG Act. Notably, within the primary parcel, all native vegetation has been avoided due to design evolution, as described in Section 3.11.2.

23 fauna species and other generalist species were recorded within the study area during the current assessment and 13 threatened fauna species have been recorded within 3km of the study area. The understorey vegetation within the powerline easement is likely to support habitat for foraging and cover for a range of indigenous mammals including ground-dwelling fauna such as Swamp Antechinus, Southern Brown Bandicoot, Long-nosed Potoroo and Heath Mouse. DEECA have agreed that it is likely these species will be present and have allowed this planning application can proceed with the assumed presence of these species.

The Proposal will result in the loss of approximately 0.775 ha of native vegetation within the existing transmission easement. The assessment includes a Native Vegetation Removal report in its appendix.

Impact mitigation

The Biodiversity Assessment recommends a number of avoidance and minimisation strategies including:

- To inform regulatory approvals:
  - Undertake a targeted survey for threatened flora species, and to inform a Protected Flora Permit
  - Undertake a 'Significant Impact Test' to determine if there is a significant impact to EPBC Act-listed fauna
  - Determine if a referral to the Commonwealth Department of Climate Change, Energy, the Environment and Water is required following the outcome of the flora survey
- Post approval, subject to regulatory approvals:
  - Engage a zoologist or wildlife handler salvage any wildlife from vegetation prior to its removal
  - Secure appropriate offsets for any approved impacts to native vegetation through an accredited Offset Broker
  - Prepare a Fauna Management Plan to manage fauna during the construction of the powerline connection
  - Prepare a Rehabilitation Plan to ensure that areas of ground disturbance are successfully recolonised and/or revegetated with appropriate vegetation
  - Prepare a Construction Environment Management Plan (or equivalent), including a 'Tree Management Plan' or similar, to ensure construction avoids any tree losses.

7.2 Aboriginal cultural heritage

A CHMP is being prepared by GML Heritage Pty Ltd to support the development of the Proposal.

Initial assessment by GML Heritage concluded that the location of the Proposal is within a landform that would typically have been used by Gunditjmara people in the past and that there is potential for Aboriginal cultural heritage material, most likely in the form of stone artefacts, to be present.

The Site also includes areas of Aboriginal Cultural Heritage Sensitivity (Figure 15). In accordance with section 7 of the Aboriginal Heritage Regulations 2018, a CHMP is required for an activity if all or part of the activity area is an area of cultural heritage sensitivity and all or part of the activity is a high impact activity. A 'utility installation' is defined as a high impact activity in accordance with section 46(1)(b) of the Aboriginal Heritage Regulations 2018.

GML Heritage has and will continue to work closely with GMTOAC to develop the CHMP.

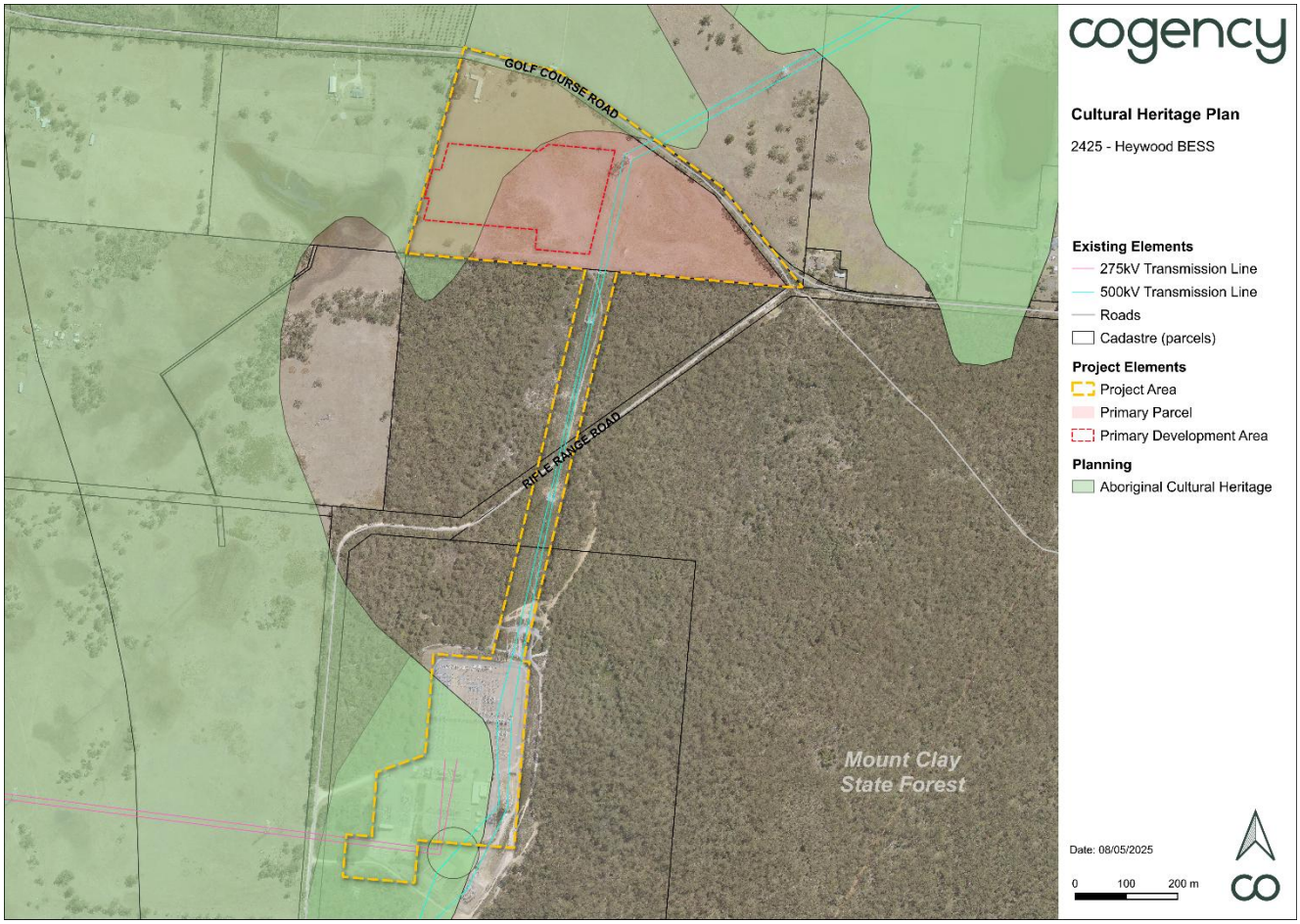


Figure 15 – Aboriginal Cultural Heritage Sensitivity Plan

Impact Mitigation

The development of the CHMP involves:

- A desktop assessment to determine the potential for Aboriginal cultural heritage to be present (draft completed)
- A standard assessment to identify any visible Aboriginal cultural heritage, establish the nature, extent and context of any Aboriginal cultural heritage, and assess the archaeological sensitivity of the landforms present (completed)

- A complex assessment to undertake subsurface testing if Aboriginal cultural heritage is expected subsurface (completed)
- Preparation of CHMP, consultation with GMTOAC, and approval of CHMP from GMTOAC (underway).

Complex testing has been undertaken, and the results have informed the design, with a small number of scattered artefacts found.

Once the assessments are complete, conditions and contingencies will be developed to manage impacts to Aboriginal cultural heritage within the site during the construction and operation of the BESS.

7.3 Transport

A Transport Impact Assessment has been prepared by One Mile Grid and is provided at Appendix F. The impact assessment outlines existing traffic conditions, proposed traffic generation and the impact of the Proposal on the road network.

The Site will be accessed via a new access point on Golf Course Road, which is a sealed local road and provides a single traffic lane in each direction and gravel and grassed verges on either side.

The traffic impact assessment concludes the Proposal is not anticipated to have an adverse impact on the operation of the surrounding road network network and has been designed to allow for appropriate vehicle access to the Site.

During the construction phase, the traffic impact assessment concluded:

- The existing Henty Highway / Golf Course Road intersection has sufficient width and dedicated turning lanes to accommodate OSOM deliveries and modelled traffic movements;
- During the construction phase, the proposed BESS will create short-term, elevated levels of vehicle movements, though the level of traffic generated is expected to have a minimal impact on the operation of the external road network;
- Car parking will be comfortably provided on-site as required.

Impact mitigation

The transport impact assessment recommends the following traffic management measures:

- Temporary speed limit reduction along Golf Course Road in the vicinity of the site, recommended speed limit: 60 km/hr
- Temporary speed limit reduction along Henty Highway in the vicinity of the Golf Course Road intersection, recommended speed limit: 80 km/hr
- Radio communications between construction vehicles at all times
- All construction traffic to be coordinated with timing of trains along Portland Railway Line
- All movements by OSOM vehicles to be controlled via Traffic controllers
- Truck warning signage to be installed on Golf Course Road and Henty Highway in the vicinity of the site.

During the construction phase, provision will be made for staff to travel to the Site via buses to reduce traffic.

A Construction Traffic Management Plan and overall Construction Management Plan should consider how construction vehicles will interact with surge increases to traffic volumes on Golf Course Road and Henty Highway, particularly during events at the nearby Heywood Golf Club. To reduce conflicts between construction traffic and event traffic, it may be beneficial to limit construction deliveries on event days.

7.4 Landscape and visual impact

A Landscape and Visual Impact Assessment (LVIA) has been prepared by Peter Haack Consulting and is provided at Appendix G. Key considerations of the LVIA include:

- The number and location of sensitive viewing locations
- The duration of the view – either static (generally long term - > 1 hour) and mobile (generally short term continually moving and static for no longer than 5 minutes
- The degree to which the proposed works would be visible
- The quality of the landscape setting
- The degree to which the Project contrasts or is compatible with the visual character of the setting – the visual modification level.

The LVIA identifies 18 sensitive viewpoints within 2 kilometres of the primary parcel. The viewpoints are at rural dwellings, along Henty Highway, and the Heywood Golf Club. The LVIA provides an assessment of each of the viewpoints including the viewing distance, duration and frequency of view, visual use area, visual sensitivity, visual modification and visual impact. The LVIA also recommends proposed amelioration planting, with an assessment of the resulting residual impact should the amelioration be implemented.

Generally, sensitive viewpoints beyond one kilometre of the primary parcel were found to have negligible or low visual impacts due to existing screening by vegetation and topography. Only three viewpoints have the potential for a high or moderate level of impact, one of which is a dwelling (R1) that Atmos have an agreement to purchase. To minimise the level of impact at this viewpoint, Atmos will either vacate the dwelling or provide additional amelioration measures. Following proposed amelioration of screen planting around the primary parcel, the residual impacts at all four locations are expected to be low.

Impact mitigation

A number of amelioration strategies are proposed, including:

- Project layout – siting components of the Proposal to maximise the distance to sensitive receptors and making effective use of existing vegetation and natural topography.
- Perimeter screen planting – establish screen planting to fill gaps in existing vegetation.
- Material selection – use non-reflective finishes and natural or neutral colours, as found in the landscape setting.

A landscape amelioration strategy is included in the LVIA appendix. A condition of permit would require a Landscape Plan to be prepared and approved.

7.5 Noise impact

A Noise Impact Assessment has been prepared by SLR Consulting Pty Ltd in June 2025. Refer to Appendix E for the Noise Impact Assessment.

Key considerations for the Noise Impact Assessment involved:

- Determining the existing noise environment of the project area through background noise monitoring,
- Modelling the expected noise emissions from the construction and operation of the proposed BESS,
- Assessing the expected noise impacts against the various requirements of the EPA,
- Consideration of cumulative noise impacts of existing and planned industry in the surrounding project area.

The assessment identified six sensitive receptors within 800 metres of the Site, and concludes that:

- Operational noise compliance can be achieved at all times without a noise wall at all receivers.

- A 3 dBA exceedance at night is predicted at the closest receiver, R1, however Atmos have an agreement to purchase the land and will either vacate the dwelling or provide additional noise mitigation measures to ensure compliance.
- The BESS is expected to be inaudible from the more utilised and accessible southern parts of the Mount Clay State Forest and it is not expected to noticeably alter or negatively impact the existing soundscape in other parts of the forest.

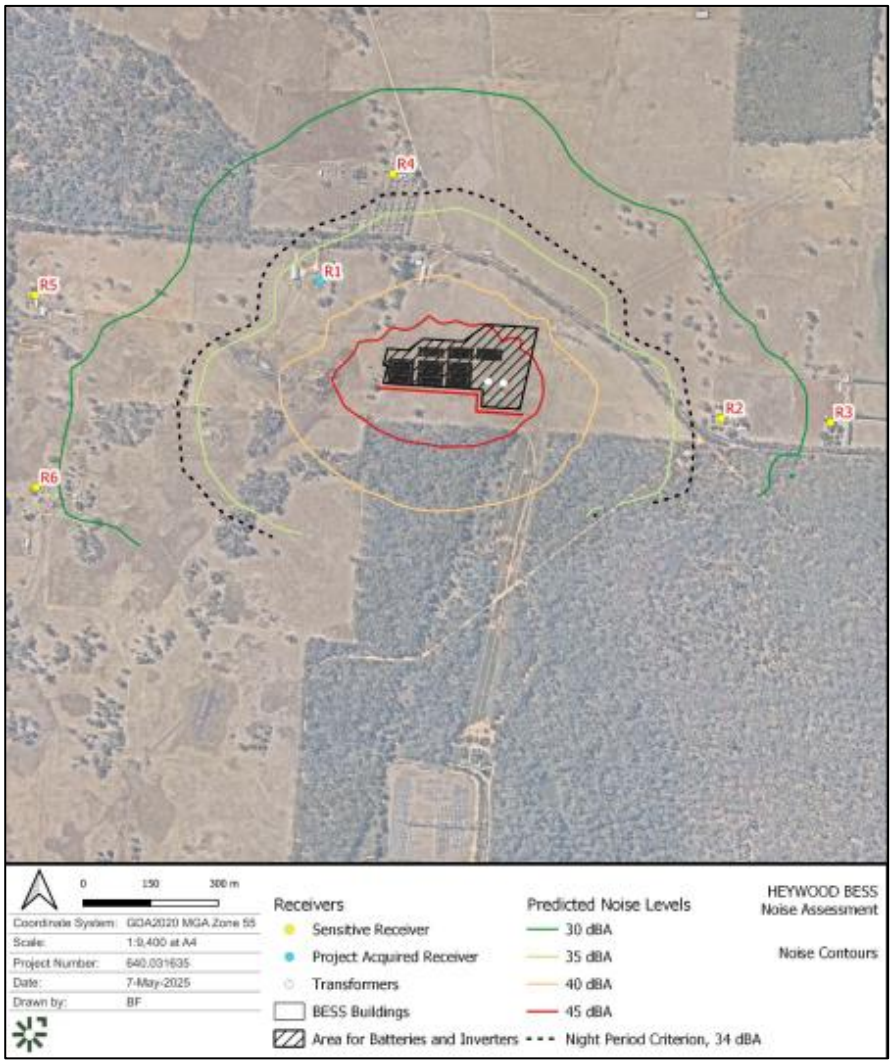


Figure 16 – Operational Noise Contours (SRL Consulting)

Impact Mitigation

In the event that R1 becomes a noise sensitive receiver in the future, compliance with the Noise Protocol can be established by constructing a 4 m noise wall along the western boundary and part of the northern boundary, as shown in Figure **17** and the Noise Mitigation Scenario Plan (Appendix B).

The Proposal is predicted to achieve operational compliance at all other receivers, at all times; hence no further mitigation measures are suggested.

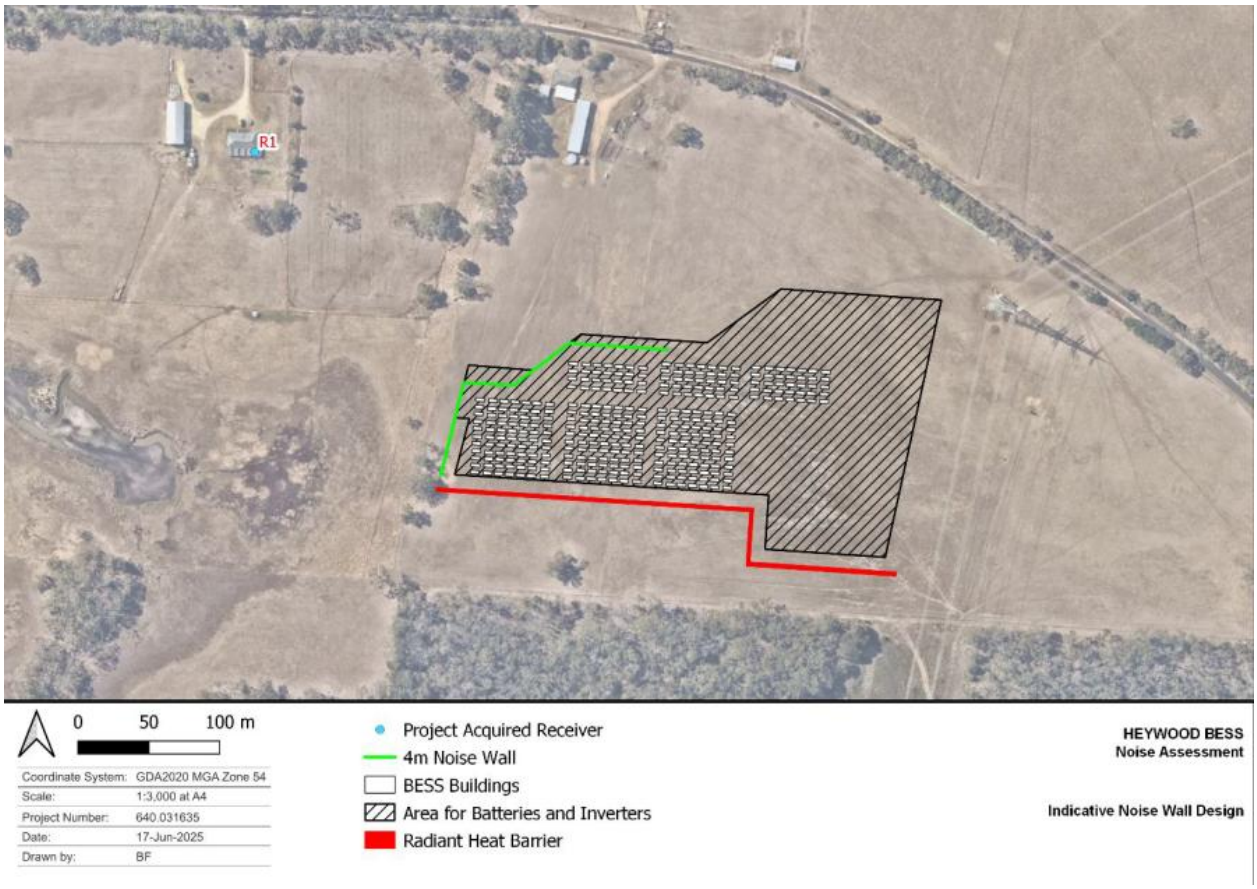


Figure 17 - Indicative noise wall (SLR Consulting)

7.6 Fire hazard and risk

A Risk Management Plan (RMP) was prepared by Fire Risk Consultants in May 2025. Refer to Appendix H for the RMP.

The objective of the report was to identify primary fire risks associated with the implementation, function, and location of the Proposal, including the BESS units.

In particular, the scope of works was to:

a. Provide a risk review consistent with fire risk assessment techniques for hazardous industry planning
b. Undertake a bushfire hazard assessment to understand potential bushfire scenarios
c. Ensure compliance with Country Fire Authority (CFA) requirements to address fire risk within renewable energy installations
d. Recommend mitigation measures if required

The report concludes that the indicative design and layout of the Proposal meets the requirements of the CFA guidelines and can adequately manage fire risk to an acceptable level. Once a BESS supplier has been selected, an updated RMP will be provided to confirm these conclusions prior to construction.

Impact mitigation

As part of the RMP, Fire Risk Consultants recommend that the following requirements be implemented to satisfy the objectives of the relevant authorities:

- Access to the site to include full perimeter access to the BESS area, including appropriate widths and load limits from access gates.
- Provision of dual access from Golf Course Road to allow responding emergency services to enter the BESS area, regardless of site conditions.

- Perimeter firebreak of 10 metres around site infrastructure.
- A minimum setback of at least 80 metres between the BESS units and the Mt Clay forest.
- A minimum setback of at least 50 metres between the substation and the Mt Clay forest.
- Fire hydrant system that complies with AS2419.1, including a static water supply, booster assembly and pumps that enables appropriate pressures at the fire hydrant.
- Minimum fire water retention of 576,000 litres.
- Fire Management Plan as per the requirements of the CFA Guidelines.
- Emergency Management Plan as per the requirements of the CFA Guidelines.
- Emergency Information Book and Emergency Information Containers located at the primary access entrance.

7.7 Hydrology

A Hydrology and Stormwater Management Strategy was prepared by DCE in May 2025 and is provided at Appendix I. The assessment looked at the existing conditions of the Site, as well as post-development hydrology, informing the design and demonstrating appropriate management.

The report discusses the impacts of on-site infiltration and surface water quality, including water quality in adjacent land and waterways and stormwater management.

The assessment concludes that the Proposal can manage stormwater appropriately and that the proposed adoption of vegetated swales and the intercept dam exceeds the statutory guidelines for stormwater treatment (meaning stormwater quality is higher than required).

Impact mitigation

The report recommends the following measures (Figure 18):

- Indicative grading of the primary parcel to protect the utility installation from 1% AEP overland flows
- Culvert to allow external flows from the east to be diverted through the primary development area
- Construction of stormwater drainage swale along the southeastern boundary of the development footprint to collect surface runoff and direct it to the intercept dam
- Construction of an intercept dam located to the south of the development footprint to fulfill the following stormwater management goals:
  - Provide retention volume to retain peak flows to those experienced in the existing condition
  - Provide stormwater volume reduction, limiting volume to that experienced in the existing condition
  - Provide a way to isolate surface runoff from the subject site to protect downstream waterways in an environmental incident.

The report provides confidence that the stormwater run-off generated by the Project can be managed on-site to pre-development conditions. As a condition of approval, it would be expected that detailed design finalisation would include updated modelling and drainage storage calculations.

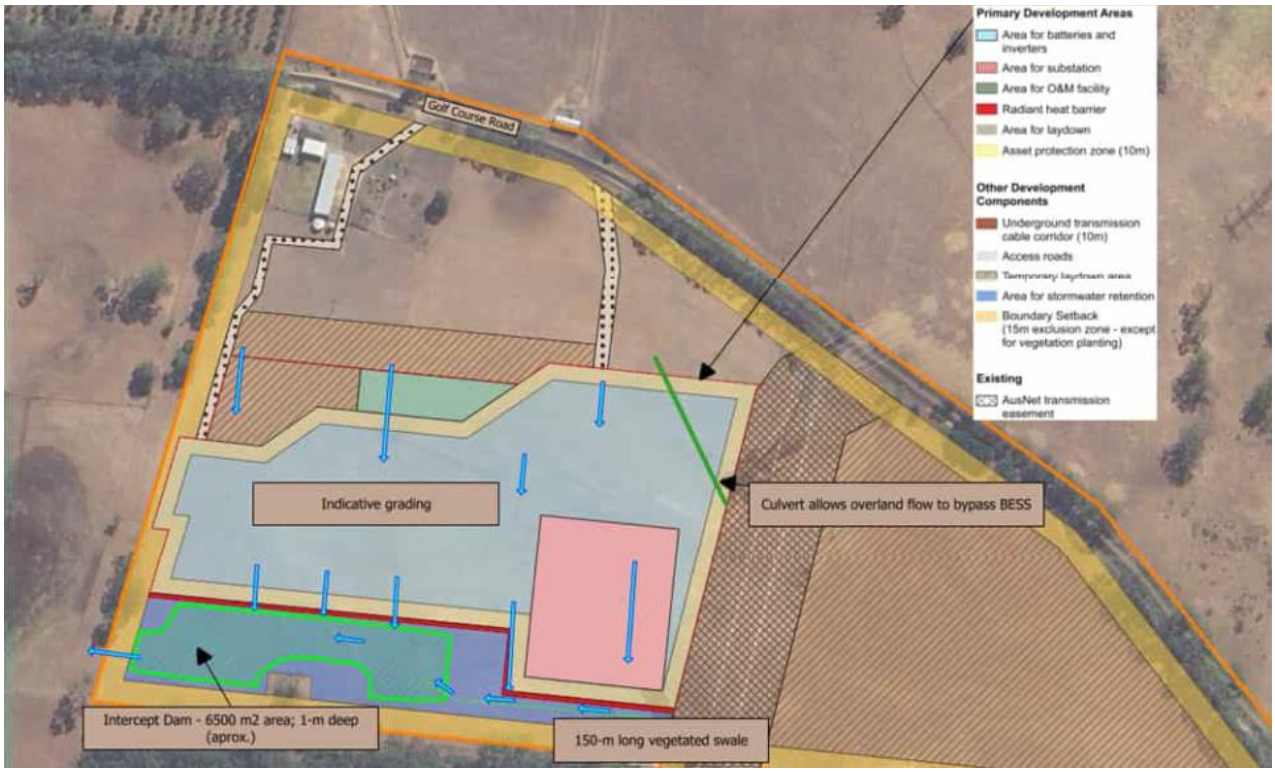


Figure 18 – Stormwater Management Overview Plan

7.8 Agriculture

An Agricultural Impact Assessment was prepared by Ag-Challenge Consulting and is provided at Appendix J.

The assessment identifies the primary parcel as well suited to grazing use and broadacre cropping but is not overly suitable for intensive irrigation development or suitable for further significant investment in agricultural infrastructure. The land is currently utilised for grazing ewes and lambs.

The primary parcel is not considered high quality agricultural land due to a lack of versatility as a result of sandy soils, lack of irrigation water and the area being mapped as a salinity province. The development of the Proposal will not result in a significant loss of agricultural sheep production. The report concludes that there are no perceived detrimental impacts of the development of the BESS facility to the surrounding farm businesses, which are predominantly beef grazing properties

Impact mitigation

The report recommends the remaining balance of land should be retained for agriculture, whether for grazing, broadacre cropping, and or fodder production, to minimise the loss of agricultural productive land. Atmos will consider agricultural grazing as part of the balance land grass management.

8. Conclusion

As demonstrated within this Planning Report, the proposed Heywood BESS, for the use and development of land for a Utility installation, is an appropriate use and form of development for the Site.

This BESS (with conceptual capacity up to 300MW/1,200MWh) is a key energy infrastructure development for Heywood and the wider Glenelg Shire region, providing critical electricity grid services, significant regional economic benefits and a major contribution to Victoria's energy storage targets.

Approval of this planning permit application is considered appropriate for the following reasons:

- It provides significant dispatchable energy storage, supporting Victoria's energy storage targets, and local existing and future energy generation projects and energy-intensive users;
- It is strategically located near the Heywood Terminal Station (a part of the Heywood interconnector – connecting SA and Victoria) and the existing 500kV transmission line;
- The Proposal is located within a highly modified landscape character, currently used for agricultural grazing and existing electricity infrastructure, and is a sufficient distance from residential land;
- The design has been carefully developed to be highly responsive to site opportunities and constraints. It avoids the more sensitive areas of the site considering cultural heritage, biodiversity values, and fire risk;
- The Proposal has been sited in the south-western portion of the primary parcel to maximise the distance to nearby sensitive receptors;
- The primary parcel has been historically cleared of native vegetation, and native vegetation removal has been avoided and impacts to natural values minimised;
- The transmission corridor is located within the existing 500kV transmission easement which has been cleared of trees to minimise biodiversity impacts to Mount Clay State Forest;
- Golf Course Road provides direct heavy vehicle access to the highway network, without the need for construction traffic to pass through residential areas or necessitate road upgrades;
- The Proposal will provide significant local and regional economic benefits, including:
  - Creation of approximately 100-150 construction jobs and 2 ongoing operational jobs;
  - Prioritisation of local employment opportunities to the extent possible for construction, operation and maintenance, as well as supporting training and development of an emerging energy industry in Victoria's South West REZ;
- It is highly consistent with the key planning provisions of the Glenelg Planning Scheme, including FZ1 and the relevant overlays;
- The Proposal strongly supports relevant state and local policy in relation to energy storage, emission reductions, infrastructure provision, and economic development within the Glenelg Shire region;
- The Proposal addresses fire safety requirements within the CFA Guidelines;
- The development is considered appropriate to the Site's surrounds and does not unreasonably impact the amenity of nearby residences. Noise modelling demonstrates the Proposal is capable of meeting Noise Protocol obligations upon operation. The components have been sited to minimise visual appearance to neighbours and vegetation screening will further reduce visibility;
- Construction impacts are manageable and will be further detailed in the environmental and construction management plans.

The application is supported by a suite of technical investigations that provide detailed assessment and justification of the Proposal. Based on these technical assessments, the Proposal is not expected to generate any unreasonable or significant environmental or community impacts. Lastly, the Proponent has undertaken a comprehensive community and stakeholder engagement program, appropriately informing nearby residents and the wider Glenelg Shire communities of the Proposal. Consistent and clear information has

been provided to stakeholders and community members about the details of the Proposal, any potential impacts, and how to get involved.

The project team has engaged with DTP and other key stakeholders including GMTOAC, DEECA, Glenelg Shire Council, and the CFA. Local community and stakeholders will continue to be engaged with during the exhibition and assessment phases of the application, and through the post-permit, construction and operation phases. The design concept has and will continue to evolve in response to technical assessments, community and stakeholder feedback.

Considering the above reasons, it is requested that Minister for Planning grant approval for this planning permit application.

Appendices

Appendix A	Certificates of Title
Appendix B	Application Plans
Appendix C	Public Land Manager Consent
Appendix D	Biodiversity Assessment
Appendix E	Noise Impact Assessment
Appendix F	Transport Impact Assessment
Appendix G	Landscape and Visual Impact Assessment
Appendix H	Risk Management Plan
Appendix I	Hydrology Assessment
Appendix J	Agriculture Impact Assessment
Appendix K	Engagement Summary Report
Appendix L	Arboricultural Assessment

Appendix A Certificates of Title

Appendix B Application Plans

Appendix C Public Land Manager Consent

Appendix D Biodiversity Assessment

Appendix E Noise Impact Assessment

Appendix F Transport Impact Assessment

Appendix G Landscape and Visual Impact Assessment

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Appendix I Hydrology Assessment

Appendix J Agriculture Impact Assessment

Appendix K Engagement Summary Report

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