cogency

4 June 2025

Graham Rogers & Trent Henderson
Central Highlands Council

By email: development@centralhighlands.tas.gov.au

Our Project Ref: 2212

RE: Response to request for Further Information, Weasel Solar Farm DA 2024/55

Dear Graham and Trent,

Thank you for your Request for Further Information (RFI) dated 14 April 2025. Please find below our response to each of the requests in Table 1.

We trust the information provided in this response is sufficient to consider the application ready for assessment. If Council considers that this response has not answered all of Council's requests, please advise accordingly as soon as possible.

Table 1 — RFI Responses

Request		Response
1.	Plans need to be consistent with cl. 6.1.3 of the Tasmanian Planning Scheme – Central Highlands. Site Analysis & Site Plan need to show the current landscape and clearly indicate all works and development associated with the proposed project. This includes, but is not limited to, the following: a) Setback distances of all structures and works, b) Location of topographical features c) Any recommendations or requirements within the specialist reports need to be shown.	The Site Analysis, Site Plan, and Master Plan have been revised to comprehensively illustrate all proposed works and development associated with the Weasel Solar Farm. Updates include the addition of key topographical features and the inclusion of minimum setback distances to the perimeter of the development. Furthermore, the plans now incorporate annotations reflecting recommendations from specialist reports, particularly in relation to stormwater runoff management and the design of internal road intersections with existing waterways. A contents page to the design pack provides a summary of plans within Appendix B as well as directs readers to plans contained within other technical documents.
2.	Discretionary uses in the Agriculture Zone Having regard to the purpose of the zone (cl. 21.1) and the objective of cl. 21.3.1 of the Scheme, further clarity is required on how the project minimises the conversion of agricultural land to a non-agricultural use.	The Agricultural Report submitted with the application confirms that the Development Area comprises marginal agricultural land with limited suitability for high-value production, consistent with the RFI's own assessment. Importantly, the report demonstrates that the proposed development can support continued agricultural use through the co-location of sheep grazing within the solar farm footprint. The proposed co-location of the solar panels with sheep grazing ensures that agricultural activity continues on the land, thereby minimising the extent of conversion to a non-agricultural use in line with the intent of the Scheme. As concluded within the Agricultural Report: The Weasel Solar Farm would result in the permanent loss of 8.22 hectares of pastureland however this loss would be outweighed by the significant ongoing operational and management benefits associated with the proposed development including a likely reduction ewe and lamb mortality and overall improved livestock productivity.
2 a)	Please provide confirmation that the layout and arrangement are sufficiently spaced to facilitate and promote pasture growth underneath to accommodate livestock grazing.	The solar farm layout provides spacing between rows of at least 10m and a minimum height clearance that ensures suitability for sheep grazing (and management). The design plans have been updated with annotations to note the spacing. Only a marginal amount of land will be taken from agricultural production (for the BESS and infrastructure hardstand), with the Agricultural Report noting this is not a significant loss. Additionally, the Agricultural Report concludes there are agricultural output

		benefits to 'agrisolar', with likely improved sheep wool production and conditions for lambing due to solar panel partial shading. While there are no Australian-based guidelines on solar design to support sheep grazing yet, there is growing proof of the co-location benefits. The design relies upon current best practice and professional knowledge – gained from other existing projects and research sources. A minimum spacing of 10m is sufficient to allow vehicle movement, sunlight penetration and support grass growth.
2 b)	Please clarify the intended management plans for the construction compound shown on the Master Plan. Specifically, what is the timespan for its use and what rehabilitation plan is to occur on the site of this area to grazing pasture is proposed.	There are three construction compound areas that are intended to facilitate the construction works e.g. delivery area for materials, temporary worker facilities, parking, hardstand, etc. The northernmost (A) is outside of the proposed PV area, thus is surplus to requirements post-construction. It will be removed upon completion of works. The central (B) and southernmost (C) are intended to form part of the PV area footprint. Their temporary status will be superseded once construction approaches completion to enable the PV array to be built. The exact management and rehabilitation can be required as a condition of permit, via the Construction Management Plan.
2 c)	In regard cl. 21.3.1 P2 of the Scheme, please provide clarification on the livestock grazing management of the site. Does the design and layout of the panels restrict the grazing option to sheep only, or can cattle graze through the site?	While cattle grazing is not currently suited to large-scale solar farms (due to risk of damage by cows), the Proponent has prepared a letter (attached) outlining that the area proposed for development is not suitable for cattle grazing and has no intention of cattle grazing that area. Sheep grazing remains a compatible and practical use beneath and between the solar arrays.
3.	**Building Heights in the Agriculture Zone** The development application indicates that the project will have a maximum building height of 18.5m for the "Vertical Post Structures", or power poles. At 18.5m the height relies on the Performance Criteria cl. 21.4.1 P1 of the Scheme. Please demonstrate that the height is "necessary for the operation" of the project, for example, why cannot the power be fed underground	The use of overhead lines for internal transmission is necessary for the operation of the Project. The collection of power from solar arrays is then conveyed via 33kV transmission to the on-site substation and step-up to the high-voltage connection. The potential alternative of underground internal transmission is not feasible or desirable, as compared to overhead: ▪ There is greater ground disturbance associated with trenching, as well as inability to 'oversail' existing vegetation. The internal transmission routes intersect multiple waterways, with the overhead option able to avoid disturbance within those Natural Asset Code areas. ▪ Underground transmission typically requires broader easement clearance. ▪ Underground transmission is significantly more expensive. Furthermore, the existing high-voltage transmission line is overhead and significantly taller and more dominant visually than the proposed overhead 33kV transmission. A dedicated internal transmission plan has been added to the design pack, noting the likely location of poles along both options of internal transmission (only one route will be utilised, but is subject to detailed design and electrical modelling). This plan shows the separation from non-involved dwellings. As a further consideration for overhead transmission; taller poles means longer spans (and wider easements), requiring an engineering balancing act to be calculated through detailed design. Ground clearance requirements and cable swing calculations will need to be determined during detailed design, and must align with Australian Standards for electrical conductors.
3 a)	Additionally, it must be demonstrated that no unreasonable impact will be caused on adjoining properties, including the Highland Lakes Road, having regard to: a) the proposed height of the building; b) the topography of the site; c) the bulk and form of the building; d) separation from existing use on adjoining properties; e) the nature of the existing uses on adjoining properties; and	The plan pack has been updated to include additional setback annotations from the development, including distance to Highland Lakes Road. Photomontages included in the LVIA include the 33kV overhead transmission (particularly Viewpoint 2, from Highland Lakes Road). The report assesses potential visual impacts and concludes that there is low impact. Notably, the topography of the Site, existing vegetation, and significant distances to non-involved dwellings means the visual impact of the proposal is low. Additionally, landscape screening is proposed to further ameliorate views. The existing context also needs to be considered, with high-voltage overhead transmission lines in the direct foreground/line-of-sight between Highland Lakes Road and the Development Area. The majority of the solar farm is hidden by topography and existing vegetation. Option 1 for internal transmission runs adjacent to the existing high-voltage transmission line easement, on the far side as viewed from Highland Lakes Road, to benefit from existing infrastructure and avoid creating a distinctly separate and 'new' line of transmission distant and distinct to existing.

	f) any buffers created by natural or other features.	
3 b)	The "Vertical Post Structures", or power poles, along with all proposed structures must be shown on a set of plans that map out setbacks and routes in relation to title boundaries, other powerlines and separation from all dwellings.	New plan created focusing on layout of internal transmission. Plans modified with additional dimensions and setbacks.
4.	**Building Setbacks in Building Heights in the Agriculture Zone** To demonstrate the siting of buildings minimises potential conflict with use on adjoining properties, pursuant to cl. 21.4.2 of the Scheme, documentation must be provided that indicates the setback of all works and development as defined by the Land Use Planning & Approvals Act 1993, to the Lot boundaries associated with the site.	Plans have been updated and illustrate the setbacks to property boundaries and non-involved dwellings. The dimensioning particularly focuses on 'distance to perimeter security fence', as that is the outermost physical development.
5.	Parking & Sustainable Transport Code In accordance with the applicable standards listed under cl. C2.6 – Development Standards for Buildings & Works, plans must be provided that demonstrate the project is compliant with: a) Construction of parking areas - cl. C2.6.1, b) Design & Layout of parking areas – cl. C2.6.2, c) Number of accesses for vehicles – cl. C6.2.3,	Plans (by Pitt&Sherry) have been updated and illustrate the concept parking layouts and construction of parking areas. Access points have previously been identified in the TIA and its plans. Additional plan updates (Appendix B) have included notes that: ▪ All internal track waterway crossings will be designed with appropriate culverts, and construction techniques/sediment control will be in place to manage stormwater and runoff appropriately. ▪ Existing overland flow paths will be maintained. ▪ Any large, impermeable surfaces will have drainage management for any runoff concentration, particularly if natural drainage is towards waterways. ▪ Detailed design plans will be prepared (as a condition of permit) for all waterway crossings and hardstand areas , along with the Construction Management Plan (and/or Environment Management Plan) that addresses soil and water management and erosion risk. Both the TIA, Ecological & Natural Assets Code Assessment and Hydrology reports address at a high-level, the interaction of culverts and waterways.
6.	Road & Railway Assets Code Consistent with the requirements of the Road & Rail Assets Code C3.0 of the Scheme, please provide plans of all associated work for the access to the site of any public road. Documentation need to demonstrate that the access design and location is suitable for the vehicles using the site during construction and the ongoing life of the project.	The TIA includes an assessment of the proposed access points (primary, secondary and tertiary/emergency), including safe sight distances, swept path analysis and indicative design plans. The preparation of the TIA was informed by discussions with DoSG, including their Crown landowner consent to lodge the application. The TIA included a number of recommendations that could be incorporated post-approval as detailed design. These recommendations have been reiterated by DoSG in their referral response (provided to the project team on 01/05/25). The proposed access points have been designed to ensure compliance with the Road & Rail Assets Code C3.0 of the Scheme. Documentation, including the Traffic Impact Assessment and the Swept path analysis (Appendix C,) Traffic Impact Assessment demonstrate the suitability of the access locations for both construction and long-term operational phases. Key measures include: - Swept paths from public roads are shown in Appendix C, demonstrating access suitability for B-doubles and semi-trailers. Each access point will be widened by 30 metres and existing culverts will be extended to accommodate turning movements. - To maintain sight lines, existing signs at the Highland Lakes Road/Waddamana Road intersection will be repositioned, ensuring safe vehicle exit from Access A. - Entrances to Weasel Plains Road and Access A, B, and C will be upgraded to rural sealed standard and sealed back 30 metres from the highway, reducing mud and gravel transfer to Highland Lakes Road. Pitt&Sherry have updated their design pack within the TIA.

Additional request via email 01/05/25: 1. **Overland Flow Maintenance:** plans need to show that all overland flow is to be maintained. However, if affected, please demonstrate how this will be managed in concept. 2. **Natural Waterway Crossings:** These crossings are to be designed to accommodate a 1-in-100 RTA storm event, applicable to the needs of the location. 3. **Driveway Layout:** Provide a conceptual plan for the driveway layout with enough detail to address its construction and drainage. This does not need to be an engineering-designed plan but should be clear and sufficiently detailed to indicate the route and topography. 4. **Access Location and Vegetation Removal:** Include the access location and details regarding any vegetation that may need to be removed for the driveway layout or sightlines to the road. 5. **Reference to Standards:** Please refer to Tasmanian Standard Drawings as a reference for driveway and access construction.	Additional notations on plans note that all overland flow paths will be maintained. While internal access tracks do cross some waterways (and associated Natural Assets Code), the hydrology report demonstrates that these typically avoid H2 and above flooding (specifically avoided as informed by hydrology modelling). Additionally, Section D4 of the Ecological & Natural Assets Code Assessment addresses code Performance Criteria and mitigations. The development will ensure that stormwater discharge into waterways is managed appropriately. Furthermore, notations have been added (Design Plans, Appendix B) that culvert design, detailed design, stormwater management and construction sediment control will be completed as part of detailed design and an Environment / Construction Management Plan post-approval. That said, the principle commitments include ensuring that there will be: ▪ Existing overland flow paths will be maintained (in a 1-in-100 RTA event). Exact crossing and culvert design will be completed post-approval, however, informed by hydrology/flood modelling. ▪ All internal track waterway crossings will be designed with appropriate culverts, and construction techniques/sediment control will be in place to manage stormwater and runoff appropriately. Table 7 of the Ecological & Natural Assets Code Assessment presents recommended management measures to address, including: – Minimise soil disturbance and sediment release. – Control erosion and sedimentation risk. – Avoid contaminant spills. – Stabilise and rehabilitate banks. ▪ Any large, impermeable surfaces will have drainage management for any runoff concentration, and will not allow direct, unfiltered discharge directly into waterways. ▪ Design and works will reference the Derwent Estuary Program's "Erosion and sediment control" (2023) for additional measures. ▪ Detailed design plans will be prepared (as a condition of permit) for all waterway crossings and hardstand areas , along with the Construction Management Plan (and/or Environment Management Plan) that addresses soil and water management and erosion risk. The design plans within the Appendix of the TIA contain indicative engineering designs for public road access points and demonstrate the capacity for upgrading to accommodate construction traffic as necessary. Internal access tracks are indicative only and subject to detailed design. Their exact layout cannot be finalised at this point in time. The principles committed to above and noted on design plans is sufficient for planning assessment. The design plans (and existing conditions photographs) within the TIA demonstrate that the existing crossover points to be augmented for project access do not require removal of vegetation. The masterplan documents within the Appendix B Design Plans do not contain detailed access or construction drawings, as these details are contained in indicative design plans (to relevant standards) within the TIA. The DoSG request for conditions on permit stem from the TIA recommendations. The Proponent is satisfied with the conditions as suggested for the planning permit.

Should you have any questions on the above, please do not hesitate to contact me on 0422 424 144 or at billy@cogencyaustralia.com.au.

Yours Sincerely,

Billy Greenham
Associate Director
Cogency Australia

CC: Kathy Bradburn, Senior Administration Officer
Louisa Brown, Senior Planner