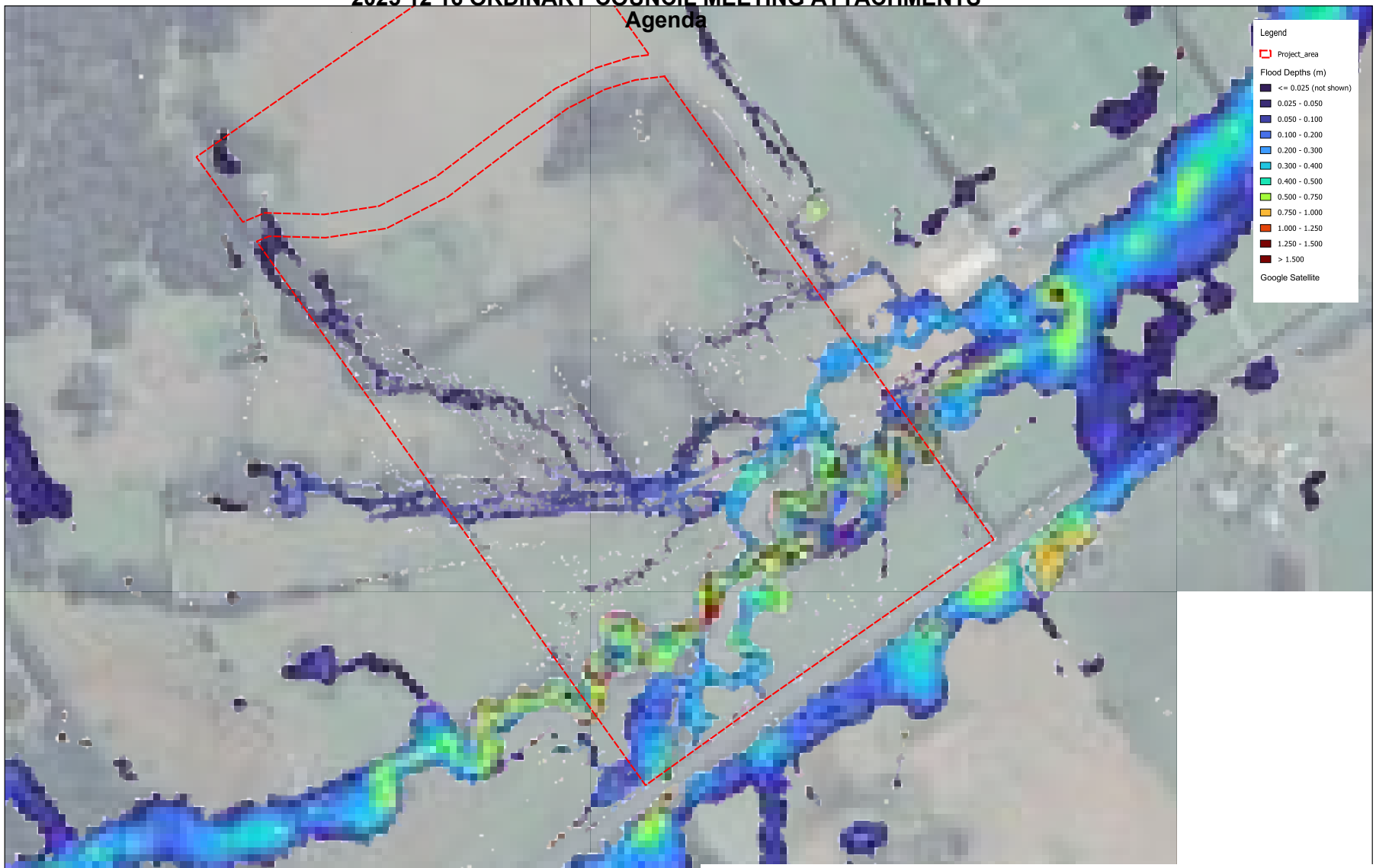
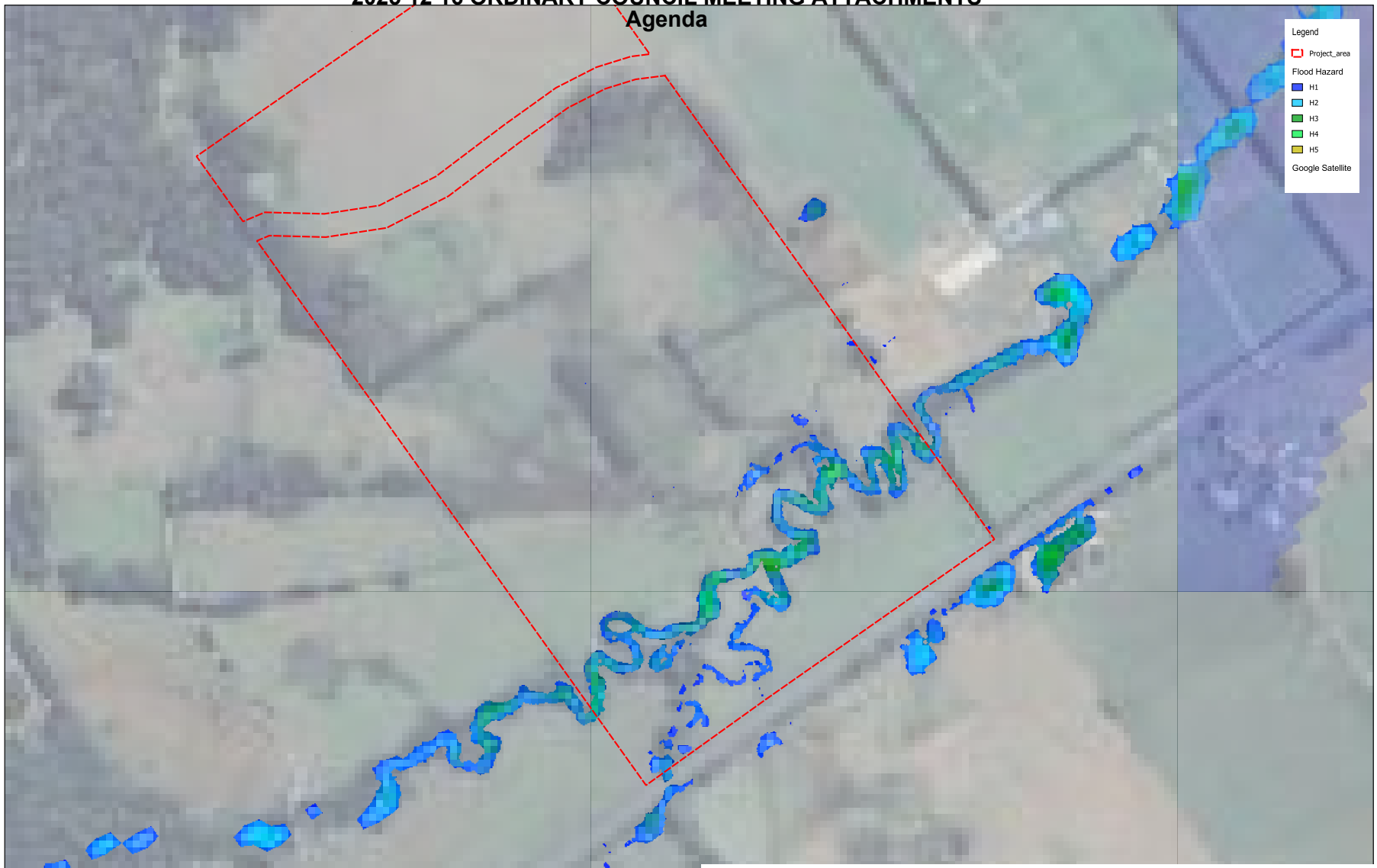
Appendix B

Flood Modelling Results


Legend
Project_area
Flood Depths (m)
<= 0.025 (not shown)
0.025 - 0.050
0.050 - 0.100
0.100 - 0.200
0.200 - 0.300
0.300 - 0.400
0.400 - 0.500
0.500 - 0.750
0.750 - 1.000
1.000 - 1.250
1.250 - 1.500
> 1.500
Google Satellite
Data Disclaimer
Surface levels have been derived using the Digial Elevation Model NorthEast2010-DEM- as publicly available and downloaded on 17/06/2025 via https://elevation.fsdf.org.au/. The mapping must not without the prior written consent of GHD be used or relied on by any other entity or person except as permitted pursuant to the Contract. GHD otherwise disclaims responsibility to any person other than the Piper River Solar Farm Pty. Ltd. arising in connection with this map. GHD also excludes implied warranties and conditions to the extent legally permissible. The services undertaken by GHD in connection with preparing this map were limited to those specifically detailed in the report and are subject to the assumptions and clarifications and scope limitations set out in the report. The map is based on conditions encounted and information reviewed at the date of preparation of the report. GHD has no responisiblity or obligation to update this map to account for events or changes occurring subsequent to the date that the report was prepared. GHD disclaims liability arising from any of the assumptions being incorrect.
Paper Size ISO A3
0
50
100 m
Map Projection: Universal Transverse Mercator (UTM)
Horizontal Datum: GDA 1994
Grid: GDA2020 / MGA zone 55
PIPER RIVER SOLAR FARM PTY. LTD
PIPER'S RIVER SOLAR FARM APPROVALS
EXISTING CONDITIONS
FLOOD DEPTHS (m)
10% AEP
Project No. 12663090
Revision No. A
Date. 11/07/2025
FIGURE 01
Document Path: \\ghdnetghd\AU\hobart\Projects\32\12643090\Tech\Design\Hydrology\02 Flood\01 QGIS\12643090-Pipers_River_TUFLOW_Master.qgz
Print Date: 11/07/2025
Data Source: Aerial Imagery (Google Maps 2025)
Created By: Daniel Gee



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Paper Size ISO A3

0 50 100 m

Map Projection: Universal Transverse Mercator (UTM)
Horizontal Datum: GDA 1994
Grid: GDA2020 / MGA zone 55

PIPER RIVER SOLAR FARM PTY. LTD
PIPER'S RIVER SOLAR FARM APPROVALS

EXISTING CONDITIONS
FLOOD HAZARD
10% AEP

Project No. 12663090
Revision No. A
Date. 11/07/2025

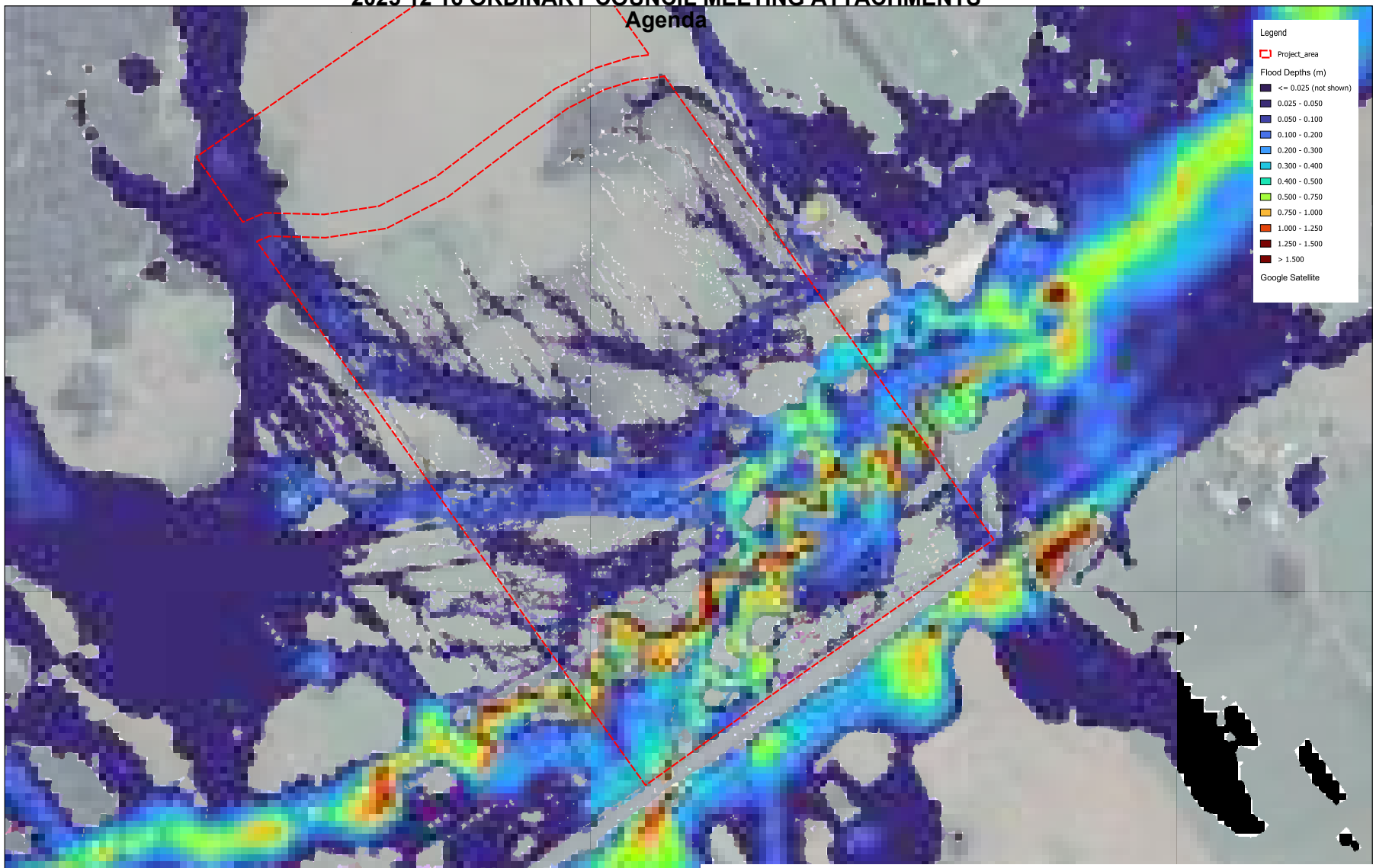
FIGURE 02

Document Path: \\ghdnet\ghd\AU\hobart\Projects\32\12643090\Tech\Design\Hydrology\02 Flood\01 QGIS\12643090-Pipers_River_TUFLOW_Master.qgz

Data Source: Aerial Imagery (Google Maps 2025)

Print Date: 11/07/2025

Created By: Daniel Gee



Data Disclaimer

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Paper Size ISO A3

0 50 100 m

Map Projection: Universal Transverse Mercator (UTM)
Horizontal Datum: GDA 1994
Grid: GDA2020 / MGA zone 55

PIPER RIVER SOLAR FARM PTY. LTD
PIPER'S RIVER SOLAR FARM APPROVALS

EXISTING CONDITIONS
FLOOD DEPTHS (m)
1% AEP

Project No. 12663090
Revision No. A
Date. 11/07/2025

FIGURE 03

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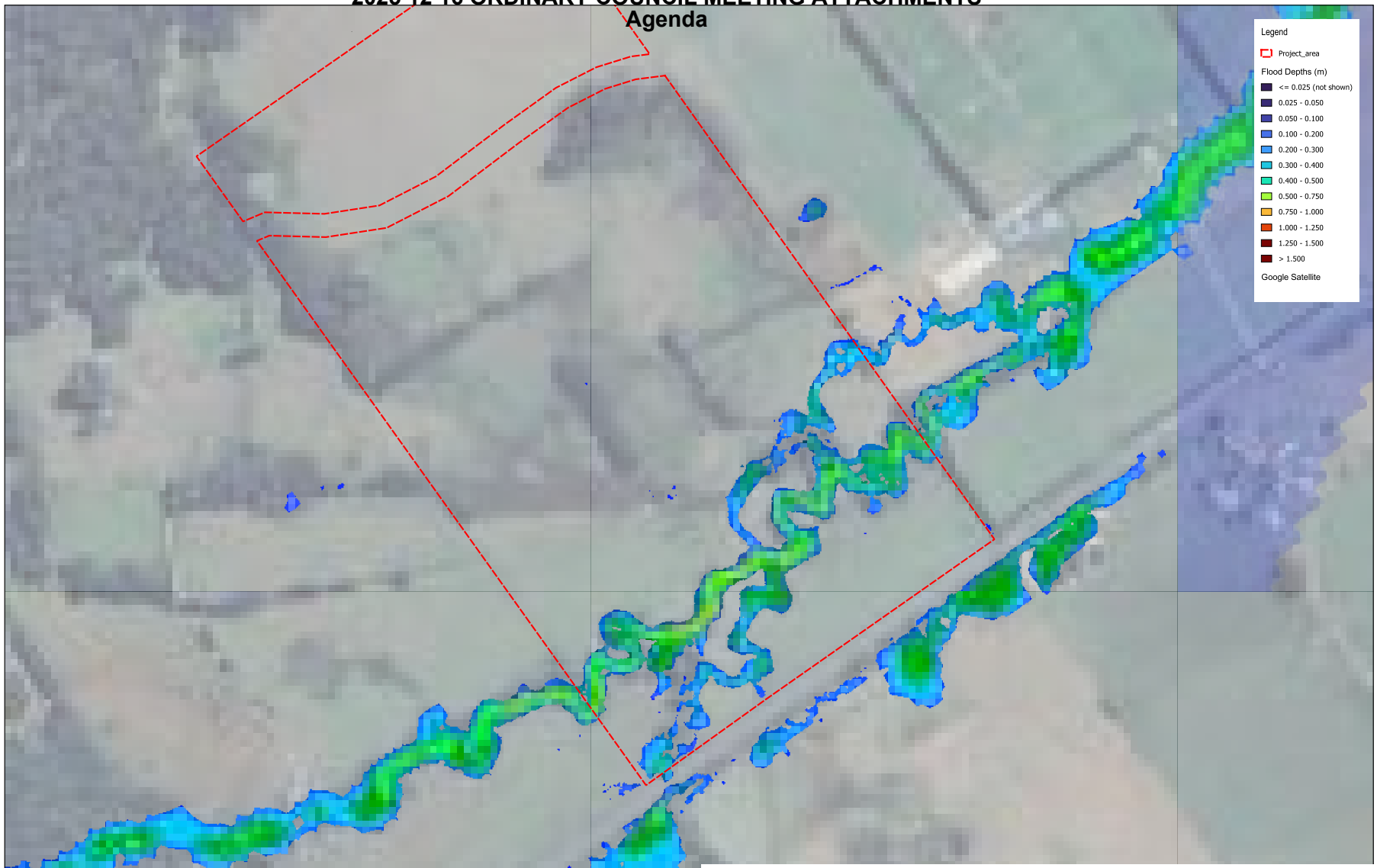
Data Source: Aerial Imagery (Google Maps 2025)

Print Date: 11/07/2025

Created By: Daniel Gee



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Paper Size ISO A3

0 50 100 m

Map Projection: Universal Transverse Mercator (UTM)
Horizontal Datum: GDA 1994
Grid: GDA2020 / MGA zone 55

PIPER RIVER SOLAR FARM PTY. LTD
PIPER'S RIVER SOLAR FARM APPROVALS

EXISTING CONDITIONS
FLOOD HAZARD
1% AEP

Project No. 12663090
Revision No. A
Date. 11/07/2025

FIGURE 04

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Data Source: Aerial Imagery (Google Maps 2025)

Print Date: 11/07/2025

Created By: Daniel Gee

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AGRICULTURAL ASSESSMENT AND COMPLIANCE REPORT

Piper River Development Pty Ltd

5560 Bridport Road, Pipers River

June 2025

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ADVISORY

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Document status
Version 1

Date	Status/issue	Reason for revision	Reviewed by	Authorised by
16 June 2025	Draft report	Technical review	JL	GM
18 June 2025	Draft report	Technical review	JL	GM
23 June 2025	Final report	QA review	GM	GM

Executive Summary

This agricultural assessment report has been prepared on behalf of the proponent, Piper River Development Pty Ltd and covers various aspects of the proposed development at 5560 Bridport Road, Pipers River.

The property in question covers approximately 24 hectares of Class 4 and 6 land.

The proposed development plan is to build a solar farm on the property, consisting of linear arrays of ground mounted solar panels and a total development area of approximately 8.5 hectares of Class 4 land.

There is no prime agricultural land on the title in question.

This agricultural assessment has concluded that the site subject to the development is capable of supporting limited agricultural land use activity due to the land capability of the property, size of suitable area, lack of access to irrigation water and the partially constrained status of the title. Therefore, the proposed development would not result in the loss of land for potential agricultural activities.

This report supports the proposed development as it does not diminish the productive capacity of the land or preclude the continued use of the land for pastoral activity at the current scale operating. Following decommissioning of the solar farm and deconstruction of the proposed infrastructure the subject property will support agricultural activity with moderate to severe limitations in the future.

The proposed development will pose negligible risk of conflict, constraint or interference to any current or future agricultural land use on neighbouring or adjoining land.

The proposed development is considered compliant with Clause 21.3.1 of the Tasmanian Planning Scheme – George Town Provisions.

Contents

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FIGURES INDEX

APPENDICES

Purpose

This report has been undertaken on behalf of Piper River Development Pty Ltd (the proponent) to support an application for a solar farm development on the property at 5560 Bridport Road, Pipers River, Tasmania 7252.

The document provides an agricultural assessment of the property in question and reports on how the proposal complies with provisions of the Tasmanian Planning Scheme. This report reviews the current agricultural usage of the property and the surrounding area in relation to the land capability and land classification. This includes soils, aspect, topography, water resource, economic feasibility, and impact of the development in relation to agricultural activities.

1 General overview

1.1 LAND CAPABILITY

The currently recognised reference for identifying land capability is based on the class definitions and methodology described in the Land Classification Handbook, Second Edition, C.J Grose, 1999, Department of Primary Industries, Water and Environment, Tasmania.

Most agricultural land in Tasmania has been classified by the Department of Primary Industries and Water at a scale of 1:100,000, according to its ability to withstand degradation. A scale of 1 to 7 has been developed with class 1 being the most productive for agriculture and resilient to degradation and class 7 the least suitable to agriculture. Class 1, 2 and 3 are collectively termed "prime agricultural land". For planning purposes, a scale of 1:100,000 is often unsuitable and a re-assessment is required at a scale of 1:25,000 or 1:10,000. Factors influencing capability include elevation, slope, climate, soil type, rooting depth, salinity, rockiness and susceptibility to wind, water erosion and flooding.

1.2 REPORT AUTHORS

Georgia McCarthy holds a Bachelor of Agriculture degree and a Post Graduate Certificate in Agricultural Consulting. She has over eight years' experience in agribusiness and agricultural consulting in Tasmania. Georgia is qualified and skilled to undertake agricultural and development assessments as well as land capability studies.

This report has been co-authored and reviewed by senior consultant, Jason Lynch. Jason Lynch possesses a Bachelor of Applied Science (horticulture) and is a certified practising agriculturalist (CPAg) with over 25 years' experience in the agricultural industry in Tasmania. He has previously been engaged by property owners, independent planners, and surveyors to undertake evaluations and studies across various council based interim planning schemes. This work involves the assessment of land for development purposes and potential conflict.

1.3 TASMANIAN PLANNING SCHEME – GEORGE TOWN

The Tasmanian Planning Scheme establishes the requirements for use and development of land in the George Town municipality in accordance with the *Land Use Planning and Approvals Act 1993.*

2 Property details

2.1 LOCATION

The subject property is owned by the proponents and is located at 5560 Bridport Road, Pipers River (Figure 1).

Table 1 Property identification details

Address	Property ID	Title reference	Hectares (approx.)
5560 Bridport Road, Pipers River	9365071	52896/2	24

The property consists of predominantly flat ground giving way to steeply sloping land and is dissected by a major stream at the southern end of the title. Some native scrub vegetation has been retained on the property and along the banks of the watercourse. Open ground on the subject property consists of unimproved pastures and common tussock grass.

The subject property is held as private freehold. Adjacent land titles are held as private freehold and permanent timber production zone land under the Forest Management Act (one title only). An existing casement is located on the subject property (Figure 4) in the form of a reserved road.

Under the Tasmanian Planning Scheme, the subject property is zoned Agriculture. Adjacent land titles are zoned Agriculture and Rural (Figure 5).

The subject property is not located within a declared irrigation district.

There are no existing buildings located on the subject property.

Figure 1 Subject property location (blue) (Source: The LISTMap).

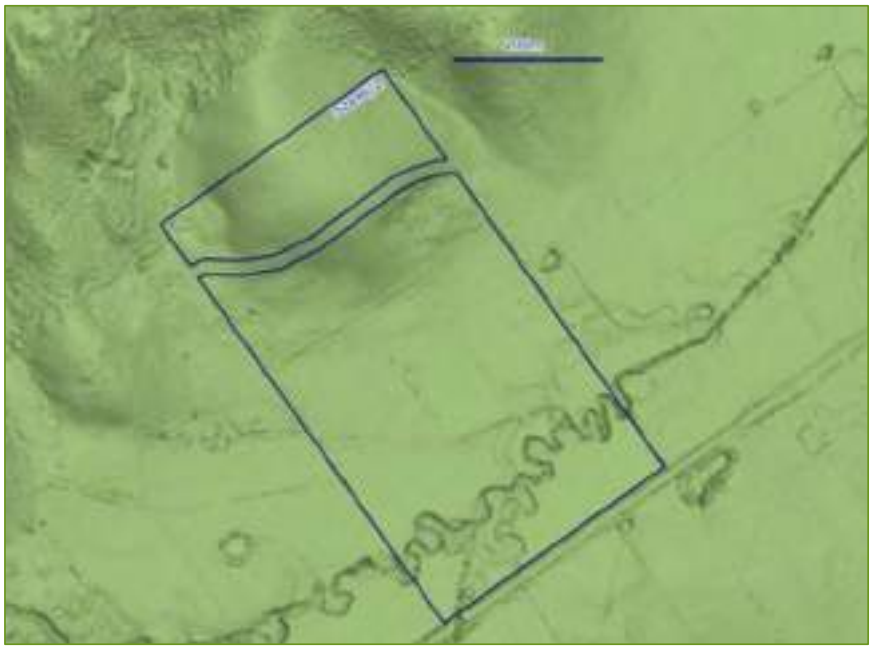


Figure 2 Topographic map of the subject property (blue outline) (Source: The LISTMap).

Figure 3 Aerial imagery of the subject property (blue outline). A casement (reserved road) dissects the property (Source: The LISTMap).

Figure 4 Land tenure of the subject property (blue outline) and surrounding land is private free hold (yellow) with one adjacent title held in tenure as permanent timber production zone land under the Forest Management Act (green). Neighbouring land is held in tenure as a regional reserve under the Nature Conservation Act (beige). An existing casement dissects the subject property, held by Crown Land (grey). (Source: The LISTMap).

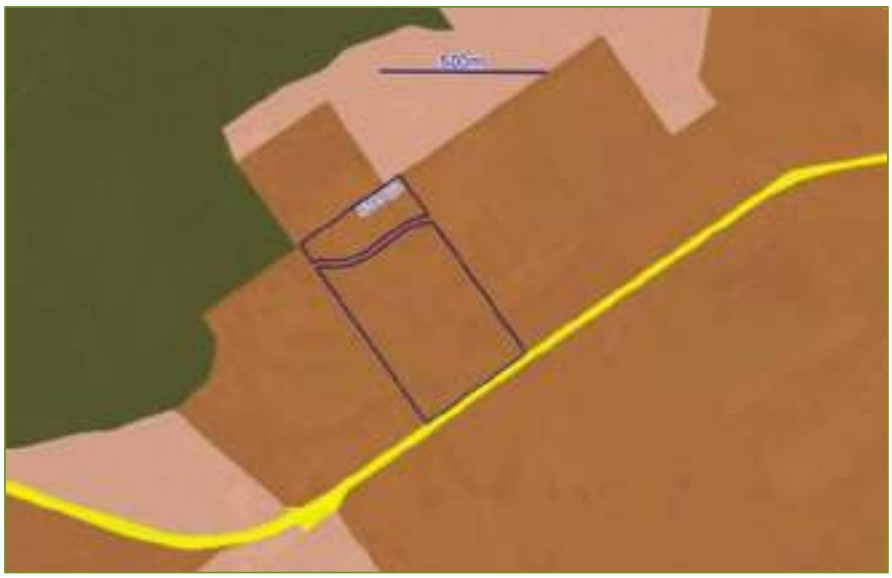


Figure 5 Under the Tasmanian Planning Scheme, the subject property (blue outline) is zoned Agriculture (brown). Adjacent properties are zoned Agriculture, Rural (beige) and Environmental Management (green). Adjacent land to the south is separated by Bridport Road which is zoned Utilities (yellow) (Source: The LISTMap).

3 Land capability

Land capability of the property was assessed according to the Tasmanian land capability classification system (Grose, 1999). Land is graded according to its ability to sustain a range of agricultural activities considering the chances of degradation of the land resource. Class 1 land is prime agricultural and Class 7 land is unsuitable for agriculture due to severe limitations. A wide range of limitations are considered, and the most significant limitation determines the final classification. For example, limitations can be in relation to soils and could include stoniness, topsoil depth, drainage and erosion hazard. Limitations to topography could include slope angle and associated erosion hazard.

3.1 SITE VISIT

Desktop research was conducted to review available data associated with geology, topography, presence of threatened native vegetation, land capability, soil information and climatic data of the property and surrounding area. Pinion Advisory consultant, Georgia McCarthy conducted a site visit on 29 May 2025 to ground-truth the information. The site assessment included inspection of the soil profile (to spade depth), an evaluation of the topography and vegetation as well as examination of land use on the subject property and neighbouring properties. These assessments consider the planned setbacks and potential impacts of the proposed development on agricultural activities.

3.1.1 Land capability assessment

The land capability assessment found the property consistent with land Classes 4 and 6. Land class definitions can be found in Table 2. Land capability assessment details can be found in Table 3. Supporting images are listed in the report Appendix.

The key land capability limitations associated with this property are:

- Soils (s): due to challenging growing conditions for pasture and/or crops associated with limitations such as topsoil depth and texture contrast frequency.
- Coarse fragments (g): due to large rock fragments at the soil surface which impact on machinery and limit growth.
- Wetness (w): due to the area lying in a topographical depression, combined with the presence of a watercourse dissecting low lying land with moderate drainage, slow permeability which presents a high risk of waterlogging and impacts on the workability and trafficability of the area.
- Complex topography (x): due to limitations caused by dissected topography which divides the land into parcels difficult to manage.

Table 2 Land capability class definitions for the property according to Grose, 1999

Class	Definition
4	Land well-suited to grazing, but which is limited to occasional cropping or to a very restricted range of crops. The length of cropping phase and/or range of crops are constrained by severe limitations of erosion, wetness, soils or climate. Major conservation treatments and/or careful management are required to minimise degradation. Cropping rotations should be restricted to one to two years out of ten in a rotation with pasture or equivalent to avoid damage to the soil resource. In some areas longer cropping phases may be possible but the versatility of the land is very limited.
6	Land marginally suited for grazing because of severe limitations. This land has low productivity, high risk of erosion, low natural fertility or other limitations that severely restrict agricultural use. This land should be retained under its natural vegetation cover.

Figure 6 Land capability of subject property (light blue lines) is consistent with Class 4 and 6 land (The LISTMap).

Table 3 Land capability assessment

Land capability class	Land characteristics							
	Geology & soils	Slope (%)	Topography & elevation	Erosion type & severity	Soil qualities	Agricultural versatility	Main land management requirements	Climatic limitations
4sw (10.5ha)	Grey to brown sandy loam kurosol soil of loose structure and uniform texture.	0-3	Flat ground, 100m ASL.	Low risk of wind erosion, moderate risk of rill or sheet erosion due to surface water movement.	Imperfectly drained, slowly permeable soils with a high risk of waterlogging. Moderate nutrient and water holding capacity.	Suitable for occasional cropping (2-in-10-year rotation) and a severely restricted range of suitable crops. Land suitable for grazing, with moderate limitations, which includes reduced grazing pressure when soils are waterlogged and/or when soil moisture is limiting and when pasture covers are reduced.	Avoid situations that lead to the exposure of bare soil, therefore maintain sufficient ground cover. The risk of compaction in winter from soil cultivation, machinery and stock movements increases significantly during periods of soil waterlogging.	Moderate climatic limitations. This region experiences cold winter and warm summer conditions. The area receives an average of 877mm annual rainfall, can experience up to 25 frost days annually, 1050 growing degree days (October to April) and 900 chill hours (May-August).
4sg (9ha)	Grey to brown sandy loam kurosol soil of loose structure with rock particles up (2-600mm in size) observed at soil surface.	0-21	Gently sloping land, giving way to steeply inclining ground, 100-120m ASL.	Moderate risk of wind erosion on bare and exposed soils. Moderate risk of rill or sheet erosion due to surface water movement.	Moderately well drained to well-drained soils, with moderate permeability and low risk of waterlogging. Moderate nutrient and water holding capacity.	Suitable for occasional cropping (2-in-10-year rotation) and a severely restricted range of suitable crops. Land suitable for grazing, with moderate limitations, which includes reduced grazing pressure when soils are waterlogged and/or when soil moisture is limiting and when	Avoid situations that lead to the exposure of bare soil, therefore maintain sufficient ground cover. The risk of erosion on loosely structured sandy soils increases significantly with soil cultivation, machinery and stock movements.	

Land capability class	Land characteristics							
	Geology & soils	Slope (%)	Topography & elevation	Erosion type & severity	Soil qualities	Agricultural versatility	Main land management requirements	Climatic limitations
						pasture covers are reduced.		
6xw (4.5ha)	Grey to brown sandy loam kurosol soil of loose structure and uniform texture.	0-7	100m ASL	Low risk of wind erosion, moderate risk of water erosion due to surface water movement. Moderate risk of stream bank erosion during periods of high water flow in the watercourse dissecting this land class.	Imperfectly drained, slowly permeable soils with a high risk of waterlogging.	Unsuitable for cropping. Some land is marginally suitable for grazing with severe limitations including reduced grazing pressure when soils are waterlogged and/or pasture covers are reduced. In reality, this land consists of complex topography due to a major watercourse dissecting the area, consisting of steep/high stream banks which makes management difficult. This watercourse is listed under the Waterway and Coastal Protection Area Guidance Map (The LISTMap) and as such a buffer zone of 70m applies.	Avoid situations that lead to the exposure of bare soil, therefore maintain sufficient ground cover. This land class is best maintained under natural vegetation.	

4 Proposed development

4.1 SOLAR FARM

The proposed development is for a solar farm to be developed on the property.

The proposed development involves the installation of ground mounted solar panels contained with in a fenced area approximately of approximately 8.5 hectares. The proposed development is planned to be located in the centre of the property at the lowest elevation. The site of the proposed solar farm has been specifically selected to maximise the balance of the property to be available for grazing livestock and to minimise the potential for negative impacts and/or interference to or from neighbouring land.

The total proposed area utilised for the development (approximately 8.5 hectares) represents approximately 35% of the total property area.

The development is proposed to be built upon a site which is considered capable of supporting limited productive agricultural land use. Agricultural activity on the subject property is limited in scale due to land capability, the size of the property, lack of access to irrigation water and the challenges imposed by the presence of a major waterway.

The productivity of agricultural activity on the subject property is further constrained by an existing casement on the title, associated buffer zones for the major watercourse (as listed under the Waterway and Coastal Protection Area Guidance Map) dissecting the land, and neighbouring Regional Reserve (held in tenure under the Nature Conservation Act) and Permanent Timber Production Zone land (held in tenure under the Forest Management Act). See Section 3 Land capability for further justification.

4.2 SETBACK DISTANCES

The boundary setbacks of the proposed development are outlined in Table 4 and Figure 7.

Table 4 Proposed development setback distances

Boundary direction	Map identifier (refer to Figure 8)	Distance (m)
N	A	260
E	B	20
S	C	223
W	D	25

**Setback distances could be subject to minor change.*

Figure 7 Proposed solar farm development (marked red) in the centre of the property, with proposed setbacks shown (white lines) (The LISTMap).

5 Land use activity

5.1 CURRENT AGRICULTURAL ACTIVITIES CONDUCTED

The subject property is currently utilised for low input and low intensity pastoral activity (livestock grazing) on unimproved pastures. A small beef finishing enterprise is currently operated by adjacent land holders, with approximately 35 beef calves grazing on the subject property (no western boundary fence currently exists between the subject property and the adjacent western title).

5.2 POTENTIAL AGRICULTURAL ACTIVITIES CONDUCTED

5.2.1 Pastoral use

The subject property is covered by Class 4 and 6 land which would support pastoral use with moderate to severe limitations. Considering the property size, land capability and topography, in conjunction with the growing season duration and rainfall, it would be reasonable to suggest a carrying capacity of approximately 17 DSE/ha (total potential carrying capacity of approximately 407 DSE/annum).

For beef cattle, a 500kg breeding cow assumes an average carrying capacity rating of 15 DSE per cow/calf unit (Meat & Livestock Australia and NSW Department of Primary Industries). Therefore, it is reasonable to consider this property has the potential to run 26 cow/calf breeding units per annum. Selling calves as 300kg weaners, the beef enterprises represent a total annual gross margin opportunity of approximately $18,300 (assuming a gross margin of $45/DSE) or an average of $760/ha. The actual value of any livestock grown on the property will vary with the prevailing market conditions.

It should be noted that the livestock grazing on the property would require supplementary feeding, such as silage or hay, when pasture growth is limiting. The gross margin returns will be diminished based on the amount of supplementary feeding required.

Based on the current condition of the property it would be realistic to consider the carrying capacity to be closer to 150 DSE/annum (approximately 10 cow/calf breeding units/annum) due to the degraded and unimproved state of the current pasture, proportion of undeveloped land retained as native vegetation and the significant grazing pressure from browsing wildlife.

To develop the property for grazing purposes would require significant investment including:

- Clearing of remnant vegetation
- Pasture development of cleared land
- Drainage
- Construction of browsing wildlife proof boundary fencing
- Construction of additional internal paddock fences
- Install a reticulated stockwater system
- Construction of stock yards
- Input of lime to lift the soil pH
- Input of fertilisers to achieve optimal soil nutrient levels for pastures.

The cost to develop the subject property for grazing purposes may reach in excess of $100,000 and based on the potential financial returns it would not be a viable or sustainable business venture.

In reality, due to a combination of the land capability of the property, in conjunction with the limited area of available land, and the economics associated with the potential pastoral development of the property, it would not be realistic nor economically sustainable to convert and establish the property further for pastoral land use activity.

5.2.2 Cropping use

Area classified as Class 6 land is unsuitable for cropping.

There is approximately 19.5 hectares of Class 4 land on the subject property that could theoretically support a sustainable annual cropping rotation of approximately 4 hectares, with a severely restricted range of crop types. All cropping activity on this property would be significantly limited due to topographic limitations and soil drainage/waterlogging issues.

Any cropping activity possible on the subject property is further limited by the lack of available irrigation water and the existing watercourse and associated buffer zone dissecting the property. The potential productivity of this land class is further constrained by the presence of a reserved road dissecting this land class on the subject property and difficulty in and securing cropping contracts for such small parcels of land.

5.2.3 Perennial horticulture

Perennial horticulture crops listed as *well-suited* for areas on the subject property consisted of blueberries and sparkling wine grapes only (with soil management), according to the ESM-Versatility Index (The LISTMap). These crop types were listed as well-suited for only a portion of Class 4 land (approximately 4 hectares) on the upper slope of the property. Major limitations on the subject property being suitable for perennial horticultural activity relate to drainage, aspect and climate (frost and growing degree days) in addition to soil qualities (type and depth).

Furthermore, horticulture crops would require significant capital investment in infrastructure, water and irrigation. Due to the absence of irrigation water on the property, the small area of land listed as suitable, the limitations on land capability and the significant economic cost associated with establishment and operation, a horticulture enterprise at the property would be considered unfeasible.

5.3 IMPACT ON AGRICULTURAL ACTIVITIES TO NEIGHBOURING LAND

The land use activity on directly adjacent land titles includes:

- North: Title reference 52896/1 (10.5ha), predominantly consisting of residual native vegetation cover with unimproved pasture on open ground and no agricultural activity undertaken. There is no residential dwelling is associated with this title.

- North East: Property ID 2535113 (19.9ha). 100% of the property has been retained as residual native vegetation, held under the Forestry Management Act. No residential dwelling is associated with this title.

- East: Title reference 168858/1 (24.6ha), consisting of semi-improved pastures for livestock grazing (equine agistment and breeding and beef cattle grazing). A residential dwelling is located on this title, approximately 205m from the proposed development on the subject property.

- South: Title reference 52896/4 (26.6ha), consisting of semi improved and improved pastures for livestock grazing of moderate input and intensity. No residential dwelling is located on this title. This title is separated from the subject property by Bridport Road.

- West: Title reference 52896/3 (24.2ha), consisting of unimproved pastures for low scale, low intensity livestock grazing. Approximately 10% of the property has been retained as residual native vegetation cover. A residential dwelling is located on the subject property, approximately 390m from the proposed development on the subject property.

Agricultural activity on the adjacent properties to the east, west and south involves dryland pastoral use (horses and beef cattle), conducted at low to moderate intensity and scale. The properties to the north are almost entirely or completely covered by native vegetation and not used for agricultural land use activity. The closest infrastructure for livestock management (arena and equine management facilities) is located on the eastern adjacent title, approximately 115m from the proposed development on the subject property (Figure 8). The proposed development on the subject property is considered to have negligible impact on normal operational activities associated with agricultural use on neighbouring land and would not interfere or constrain agricultural activity on these land titles.

Figure 8 The closest infrastructure for livestock management is located approximately 115m from the proposed development on the subject property (orange marker) and used for equine management (arena and round yard). (Source: The LISTMap).

5.4 IMPACT OF AGRICULTURAL ACTIVITY ON NEIGHBOURING LAND TO THE PROPOSED DEVELOPMENT

The subject property's interaction with adjacent properties includes:

- North: Agriculture zoned land, not currently utilised for agricultural activity.

- North East: Rural zoned land, not currently utilised for agricultural activity.

- East: Agricultural zoned land, currently utilised for low intensity, low input dryland pastoral activity (livestock grazing).

- South: Agriculture zoned land, currently utilised for moderate intensity, moderate input dryland pastoral activity (livestock grazing). This title is separated from the subject property by Bridport Road.

- West: Agriculture zoned land, currently utilised for low intensity, low input dryland pastoral activity (livestock grazing).

Normal operational activities associated with agricultural use on neighbouring land are not expected to have any unreasonable impact on or interference with the proposed development on the subject property. The naturally occurring landscape buffers (distance, vegetation and topography) of the surrounding area will provide sufficient separation from neighbouring agricultural activity and significantly reduce any impact the activity has to the proposed development on the subject property. An assessment of the key risks is summarised in Table 5.

Table 5 Potential risk from agricultural land use activities on neighbouring land

Potential risk from neighbouring agricultural land activity	Extent of risk & possible mitigation strategy
1. Spray drift and dust	Risk = low. Existing buffer distances, topography and presence of existing significant parcels of native bushland vegetation would help mitigate the impact of sprays and dust if applied under normal recommended conditions. Spraying events should be communicated in a timely manner to the landholder. The application of all agricultural chemicals must abide by the Tasmanian Code of practice for ground and aerial spraying 2014 and any applicable agricultural chemical label requirements.
2. Noise from machinery, livestock and dogs	Risk = low. Some occasional machinery traffic will occur when working and undertaking general farming duties on adjacent land which is expected to be periodic and infrequent. The property is located in a rural area, and it is accepted that some noise emission will be created from normal primary industry, farming and land use activity.
3. Irrigation water over boundary	Risk = low. Irrigation is not practiced on any adjoining land.
4. Stock escaping and causing damage	Risk = moderate. Boundary fences will need to be established and/or repaired and maintained in sound condition. Ensure that fences and livestock are checked regularly.
5. Electric fences	Risk = low. Mitigated by the proponent attaching appropriate warning signs on boundary fencing if required.

5.5 IMPACT OF PROPOSED DEVELOPMENT ON AGRICULTURAL ACTIVITY OF NEIGHBOURING LAND

The proposed development, in consideration with the buffer zones, physical barriers and agricultural land use, have all been assessed as low risk impact to agricultural activity on neighbouring land. These potential impacts are usually manifested as complaints which could be made by residents of nearby dwellings. Other risks to neighbouring agricultural activity are outlined in Table 6.

Table 6: Potential risk from proposed development on neighbouring agricultural land use and activity

Potential risk to neighbouring agricultural land activity	Extent of risk & possible mitigation strategy
1. Trespass	Risk = low. Mitigation measures include installation and maintenance of sound boundary fencing, lockable gates and appropriate signage to warn visitors about entry onto private land, report unauthorised entry to police.
2. Theft	Risk = low. Ensure there is good quality boundary fencing on neighbouring properties and appropriate signage to deter inadvertent entry to property, limit vehicle movements, report thefts to police.
3. Damage to property	Risk = low. As for theft.
4. Weed infestation	Risk = low. Risks are expected to be low provided weed management is undertaken and routine weed control activities are performed. The proponent is committed to proactive management of weed control.
5. Fire outbreak	Risk = low. Fire risk can be mitigated by careful operation of burn-offs and disposal of rubbish. In summer, mowing/grazing of long dry grass and vegetation is important.
6. Dog menace to neighbouring livestock	Risk = low. No residential dwelling is planned as part of the proposed development and as such no dogs will be kept on the title. Any dogs present on the subject property at various times would be managed as per the guidelines determined by the George Town council.

5.6 IMPACT OF PROPOSED DEVELOPMENT ON AMENITY OF DWELLINGS ON NEARBY LAND

There are eight residential dwellings on neighbouring land within a one-kilometre radius of the centre of the proposed development on the subject property (Figure 9). The closest residential dwelling, as present on property title reference 168858/1, is located approximately 205m away, on the eastern adjacent title.

Due to the nature of the proposed development (solar farm) and considering the separation distances, road, topography and native vegetation acting as natural buffers between the proposed development and neighbouring residential dwellings, it is anticipated that the proposed development would have negligible impact on or compromise the function of, any amenity of nearby dwellings or the surrounding settlements.

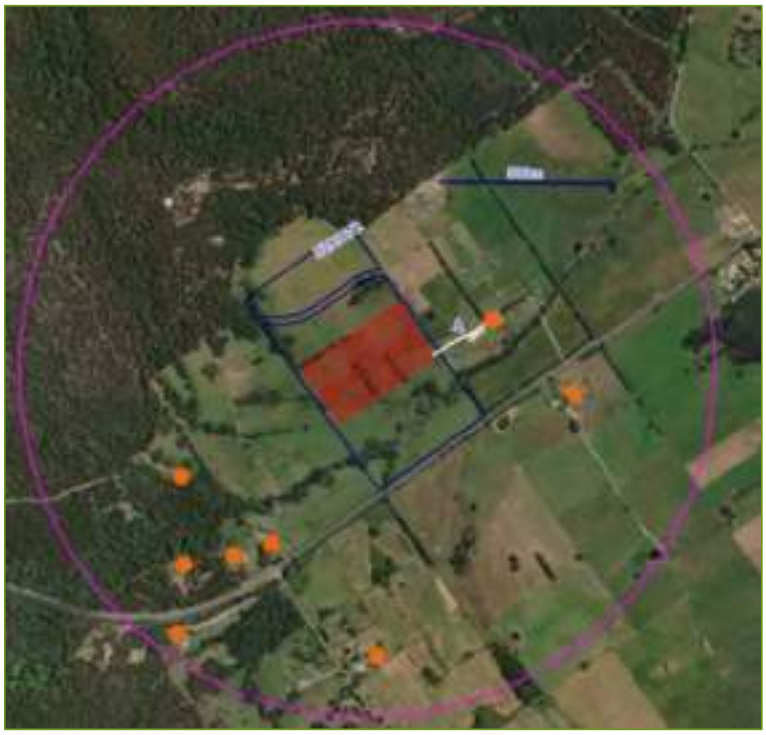


Figure 9 There are eight residential dwellings (orange markers) on adjacent land titles within a 1000m radius (pink circle) of the proposed development on the subject property. The closest residential dwelling on adjacent land would be located approximately 205m from the proposed development (setback marked as 'A') (The LISTMap).

5.7 WATER STORAGE AND RESOURCES

The property is not serviced by TasWater for the provision of water and sewerage services (The LISTMap).

There are no dams or bores located on the property.

The property is not located within in a declared irrigation district.

There are two main waterways, a minor stream, as well as several natural drainage lines present on the subject property (Figure 10).

On the southern area of the property, Back Creek flows in a west to east direction and is fed by Eddie Creek from the south and an unnamed tributary which drains the central area of the block (The LISTMap).

Figure 10 three definite watercourses are present on the subject property (light blue lines) (The LISTMap).

These watercourses are listed within the Waterway and Coastal Protection Area, under C7.0 Natural Assets Code of the Tasmanian Planning Scheme – State Planning Provisions and as such, associated buffer zones apply (Figure 10) (The LISTMap).

Figure 11 The watercourses present on the subject property are listed under the Waterway and Coastal Protection Area Guidance Map and as such an associated buffer zone applies (marked green). A listed wetlands (marked blue) and related buffer zones is also present on neighbouring land to the south (marked blue) (The LISTMap).

6 Planning compliance report

6.1 CLAUSE 21.0 AGRICULTURE ZONE

6.1.1 Clause 21.3.1 Discretionary use

Objective
That uses listed as discretionary: (a) support agricultural use, and (b) protect land for agricultural use by minimising the conversion of land to non-agricultural use.
Response
The proposed development is for a utilities development which would provide for the generation of electricity (ground mounted solar energy installations greater than 18m^2). This development does not meet the requirements of Section 4.0 Exemptions under the Tasmanian Planning Scheme and is considered a Discretionary Use, hence the concentration on the response to Performance Criteria P2 (a, b and c).
Performance criteria
P2 A use listed as Discretionary, excluding Residential, must minimise the conversion of agricultural land to non-agricultural use, having regard to: (a) the area of land being converted to non-agricultural use; (b) whether the use precludes the land from being returned to an agricultural use; (c) whether the use confines or restrains existing or potential agricultural use on the site or adjoining sites.
Response
P2 (a) The subject property is currently utilised for agricultural activity (pastoral activity) albeit at a low level of intensity and scale. The property is significantly constrained in its agricultural use due to the low land capability of the land parcel, the small size of the property, and the complete lack of access to irrigation water. There are no existing buildings, infrastructure or dwellings on the subject property. Further limiting agricultural activity on the subject property is the absence of internal fencing, livestock infrastructure (i.e. yards), watering points and the disrepair/absence of western and northern boundary fences. The planned location of the proposed development has been selected to maximise the balance of land on the property for agricultural use, avoid interference with existing watercourses and road reserve dissecting the title, and to reduce any impact or interference from or to activities or amenities on neighbouring land. The total area proposed for the development is approximately 8.5 hectares, with the balance of the land (15.5 hectares) available for continuation of the current grazing activity. (b) The proposed development includes the construction of linear arrays of ground mounted solar panels (total maximum height of 3m), a battery storage system and 22kV underground powerline within a 367m x 234m (2.1m high) fenced area (to be constructed as part of the development). This development would be constructed using modern building materials, which would not preclude the land from being returned to an agricultural use. Once the solar farm has reached its operational life and is decommissioned, all infrastructure can be dismantled and removed, and the site fully rehabilitated and returned back to agricultural use, as per continuation of the grazing activities. Only minor earthworks are involved in the development, and therefore minimal soil disturbance would occur. In terms of site remediation following decommissioning of the solar farm, required activities include the removal of all infrastructure (solar arrays, footings, battery and ancillary buildings etc), remediation of the soil (e.g. ground leveling, application of lime/gypsum) and pasture renovation as required (resowing). The legacy infrastructure (e.g.

boundary fencing, internal roads and tracks) would likely allow for an improved level of property management and associated agricultural productivity (as per grazing livestock).

(c) The subject property is suitable for agricultural activity in its current state and in the future albeit with moderate to severe limitations on the type and scale of activity due to land capability, limited size of suitable area, lack of access to irrigation water and its partially constrained status. The location of the proposed development has been selected specifically to minimise any impact on potential agricultural use on the subject property and on adjoining titles. Low intensity, low input dryland livestock grazing activity (approximately 35 beef cattle calves) is currently operating on the subject property. This livestock enterprise is owned and managed by the adjacent western land holder and could continue to operate operate on the subject property in conjunction with the proposed development, subject to appropriate infrastructure being installed (boundary and internal fences, gates and stock watering points). Agricultural activity on adjoining titles is limited to low intensity, dryland livestock grazing on two properties only. Dryland livestock grazing of moderate intensity operates on one adjacent property to the south and this title is separated from the subject property by Bridport Road. The setback distances of the proposed development from the subject property boundaries exceed the requirements and are sufficient to minimise impacts or interference from the proposed development to adjoining properties. See Section 4.2 Setback distances for further information. Based on the type (utilities) and location of the proposed development, it is not anticipated to have a negative impact on the current and future land use activities which could be undertaken on the adjacent and nearby properties.

7 Conclusion

1. The property is covered by class 4 and 6 land.
2. The property is capable of supporting small scale pastoral activity with moderate to severe limitations.
3. The proposed development will not preclude pastoral activity from continuing to operate on the subject property in its current state or preclude the return of the land proposed for the development to agricultural use in the future.
4. The proposed development is sensitive to the adjacent land use activity and is not anticipated to create any negative impacts and/or constrain on the capability/capacity of the neighbouring properties which are to be actively managed and used for agricultural land use activity.
5. The subject property is not within a declared irrigation zone and has no access to irrigation water.
6. The proposal is consistent with the Tasmanian Planning Scheme Agriculture zone purpose, use standards, acceptable solutions and performance criteria statements 21.3.1.

8 References

Cotching B. (2009) Soil Health for Farming in Tasmania.

Grose C.J. (1999) Land Capability Handbook: Guidelines for the Classification of Agricultural Land in Tasmania. 2nd Edition, DPIWE, Tasmania.

Isbell R.F., National Committee on Soil and Terrain (2021), 'The Australian Soil Classification. 3rd edn.' CSIRO Publishing Melbourne.

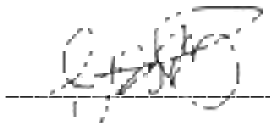
Noble K.E. (1993) Land Capability Survey of Tasmania, Pipers, report and 1:100 000 map. Department of Primary Industry and Fisheries, Tasmania.

Spanswick S.B, Kidd D. & Dimmock G.M. (2001) Beaconsfield-George Town Soil Report: Reconnaissance Soil Map Series of Tasmania, DPIPWE, Tasmania

Tasmanian Planning Scheme.

9 Declaration

I declare that I have made all the enquiries which I consider desirable or appropriate, and no matters of significance which I regard as relevant have, to my knowledge, been withheld.



Miss Georgia McCarthy BAg & GradCert AgCons
Agricultural Consultant
Pinion Advisory
June 2025

Mr Jason Lynch BAppSc (hort.)
Snr Agricultural Consultant
Pinion Advisory
June 2025

Appendix 1 Supporting images

Figure 12 Grey to brown sandy loam kurosol soils. Taken at site assessment 29/5/2025.

Figure 13 Southern boundary of the subject property, facing east on Bridport Road. Taken at site assessment 29/5/2025.

Figure 14 Southern boundary of the subject property, facing west on Bridport Road. Taken at site assessment 29/5/2025.

Figure 15 Eastern boundary of the subject property facing adjacent title TR: 168858/1.

Figure 16 4sw land class land at the southern end of the subject property, facing north west. Taken at site assessment 29/5/2025.

Figure 17 The subject property is dissected by Back Creek which disrupts the title with complex topography, making management and trafficability of the area difficult. Taken at site assessment 29/5/2025.

Figure 18 6xw land class land on the subject property. Complex topography characterised by the deep watercourse dissecting the area, making management difficult. Taken at site assessment 29/5/2025.

Figure 19 Back Creek, listed as a major stream (The LISTMap) dissects the subject property. Taken at site assessment 29/5/2025.

Figure 20 The complex topography caused by Back Creek running through the property, breaks the land up into small parcels which are difficult to manage separately or as a whole. Taken at site assessment 29/5/2025.

Figure 21 The watercourse is characterised by high stream banks and a wide floor, unsafe for livestock to negotiate. Taken at site assessment 29/5/2025.

Figure 22 The western boundary on the subject property, facing north. Boundary fencing between the subject property and adjacent title TR: 52896/3 is in disrepair. Taken at site assessment 29/5/2025.

Figure 23 The western boundary on the subject property, facing south. Boundary fencing between the subject property and the adjacent title TR: 52896/3 is in disrepair. Taken at site assessment 29/5/2025.

Figure 24 Centre of the location for the proposed solar farm development, facing south. Class 4sw land, low lying and consisting of degraded and unimproved pastures. Taken at site assessment 29/5/2025.

Figure 25 Approximately 30 calves have access to the subject property for grazing (livestock owned and managed by the western adjacent land holder). Pastoral use could continue in conjunction with the proposed development, subject to adequate boundary fencing and access to stock watering points. Taken at site assessment 29/5/2025.

Figure 26 Overlooking the location of the proposed development on the subject property. taken from the north at the highest elevation on the subject property, facing south towards Bridport Road. Taken at site assessment 29/5/2025.

Figure 27 Northern boundary of the subject property, facing north towards adjacent title TR: 52896/1. Boundary fencing is in disrepair. Taken at site assessment 29/5/2025.

Figure 28 Land Class 4g land at the highest elevation on the subject property consists of large rock fragments observed at the soil surface. Taken at site assessment 29/5/2025.

Figure 29 overlooking the eastern adjacent land title (TR: 168858/1) from the highest elevation on the subject property. This title is used for livestock grazing of horses and cattle, with a residential dwelling located approximately 205m from the proposed development on the subject property. Taken at site assessment 29/5/2025.

Figure 30 Southern adjacent land to the subject property (TR: 52896/4) is used for livestock grazing of moderate intensity and is separated from the subject property by Bridport Road. Taken from Bridport Road at site assessment 29/5/2025.

Figure 31 Access to the subject property is via Bridport Road. Taken at site assessment 29/5/2025.

Department of State Growth

Salamanca Building Parliament Square
4 Salamanca Place, Hobart TAS
GPO Box 536, Hobart TAS 7001 Australia
Email permits@stategrowth.tas.gov.au Web www.stategrowth.tas.gov.au
Ref: SRA-24-838

Tasmanian Government

Simon Lukies
GHD obo Piper River Solar Farm
By email: simon.lukies@ghd.com

Dear Simon

Crown Landowner Consent Granted - Lot 2 Bridport Road, Pipers River

I refer to your recent request for Crown landowner consent relating to the development application at Lot 2 Bridport Road, Pipers River (FR 52896/2) for Relocation of access and closure/surrender of second access.

I, Fiona McLeod, Director Asset Management, the Department of State Growth, having been duly delegated by the Minister under section 52 (1F) of the *Land Use Planning and Approvals Act 1993* (the Act), and in accordance with the provisions of section 52 (1B) (b) of the Act, hereby give my consent to the making of the application, insofar as it affects the State road network and any Crown land under the jurisdiction of this Department.

The consent given by this letter is for the making of the application only insofar as that it impacts Department of State Growth administered Crown land and is with reference to your application dated 25 November 2024, and the approved documents, as accessible via the link below:

https://files.stategrowth.tas.gov.au/index.php/s/WrLyKnyzuaVYV7U

A copy of the Instrument of Delegation from the Minister authorising the delegate to sign under section 52 of the Act can also be accessed via the above link.

Please access and download these documents for your records as soon as possible as this link will expire six months from the date of this letter.

In giving consent to lodge the subject development application, the Department notes the following applicable advice:

Access – construction or alteration (Access works permit required)

In giving consent to lodge the subject development application, the Department notes that the proposed access to the State road network will require the following additional consent:

The consent of the Minister under Section 16 of the *Roads and Jetties Act 1935* to undertake works within the State road reservation.

For further information please visit https://www.transport.tas.gov.au/roads_and_traffic_management/permits_and_bookings/new_or_altered_access_onto_a_road_driveways or contact permits@stategrowth.tas.gov.au.

On sealed State roads all new accesses must be sealed from the road to the property boundary as a minimum.

Pursuant to Section 16 of the *Roads and Jetties Act 1935*, where a vehicle access has been constructed from land to a State highway or subsidiary road, the owner of that land is responsible for the maintenance and repair of the whole of the vehicular access.

Other types of works (pipeline, etc.) OR Construction of infrastructure in the road reserve/on Crown land (Works permit required)

In giving consent to lodge the subject development application, the Department notes that the works in the State road network will require the following additional consent:

The consent of the Minister under Section 16 of the *Roads and Jetties Act 1935* to undertake works within the State road reservation.

For further information please visit https://www.transport.tas.gov.au/roads_and_traffic_management/permits_and_bookings or contact permits@stategrowth.tas.gov.au.

Access licence requirement

Subject to approval of the development application by Council and subject to the satisfactory closure, relocation, and upgrade of the access, Access Licence No. A1400-L74-024, issued pursuant to Part IVA of the *Roads and Jetties Act 1935* (the Act), will be required to be varied. Please note that access licences are issued to the registered landowner under strict conditions. Access Licence No. A1400-L74-022 is to be surrendered to the Department as provided for under the Act.

For further information or to apply to vary Access Licence No. A1400-L74-024 and surrender Access Licence No. A1400-L74-022, please contact Property Assets on (03) 6166 3442 or property.assets@stategrowth.tas.gov.au

Mineral exploration

It is noted that PID 9365071 is covered by Exploration Licence SEL10/2023
Authority of exploration licence (under the *Mineral Resources Development Act 1995*)
(1) A licence authorises the holder of the licence, a person authorised by the holder of the licence, and a person acting under a contract of service, or a contract for services, with the holder of the licence–

(a) to explore, in accordance with the conditions of the licence, in the area of land specified in the licence for minerals, or minerals within the category of minerals, specified in the licence; and
(b) to enter on, and pass over, Crown land for that purpose, in accordance with the conditions of the licence; and
(c) subject to subsection (2), to enter on, and pass over, private land, in accordance with the conditions of the licence, for that purpose.

(2) A person may only enter on, or pass over, private land by giving written notice in an approved form to the owner or occupier of the land 14 days or any shorter period the owner or occupier allows before doing so.

(3) A person must not hinder or obstruct a licensee from carrying out any activity under the licence.

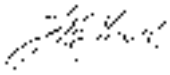
Penalty: Fine not exceeding 100 penalty units.

(4) A person must not sell any mineral recovered during exploration without the approval of the Director.

Penalty: Fine not exceeding 500 penalty units or revocation of the licence, or both.

The Department reserves the right to make a representation to the relevant Council in relation to any aspect of the proposed development relating to its road network and/or property.

Yours sincerely



Fiona McLeod
DIRECTOR ASSET MANAGEMENT

Delegate for the Minister administering the *Roads and Jetties Act 1935*

19 March 2025

cc: General Manager, George Town Council

Executive Summary

This summary sets out the primary grounds with scheme/code references and the missing information preventing a proper assessment.

Issue	Scheme / Code Clause	What's missing / Why it fails	Evidence pointer
No Glint & Glare study (equestrian & road receptors)	C9.5.1 P1(a), C9.5.2 (a-c) C8.6.1(b); 21.3.1 P2(c)	No receptor-specific modelling of occurrence /duration /intensity; equestrian safety cannot be assessed.	No study supplied
Scenic Road Corridor	C8.6.1(b)	Reduction of scenic value	Code C8.0
No LVIA from private viewpoints	C8.6.2 P2(a–f)	No photomontages / visual simulations adjoining equine training facility	Zone Code 21
No operational & construction noise modelling at equine receptors	C9.5.1 P1(a)	No tonal/low-frequency assessment; no construction noise/vibration analysis.	Code C9.0
Bushfire – no TFS-endorsed EMS / BHMP	C13.5.2 (A2, A3, P1)	No endorsed strategy; no BESS isolation/thermal runaway plan; no standoff distances.	Code 13
Flood-prone site with no Flood Hazard Report	C12.6.1 (b) P1.1,P1.2; C12.5.2 (hazardous use)	1% AEP mapping applies; no qualified report to show tolerable risk/no off-site effects.	Code 12.0
Stormwater redirected to Back Creek; interception of spring flows	C7.6.1 P1 (a-e, f,i) Waterway & Coastal Protection	Boundary swales/outfalls expedite delivery to creek; risk to neighbour's lower dam not addressed.	Code 7.0
Attenuation Code applies (sensitive equestrian use; chemical storage)	C9.5.1 A1/P1; Table C9.1	BESS = Storage–Chemicals (500 m). A1 not met; P1 not satisfied on evidence. BESS does not support Agriculture	Code 9.0

Natural Assets – Wedge-tailed eagle habitat/perching	C7.6.2 (a,c) P1.1 (d) P1.2 (d)	No targeted raptor survey; line-of-sight disturbance risk overlooked.	Code 7.0
BESS detail missing; Hazardous Use	C9 C13 C12	Capacity only known from prior docs (~22,016 kWh); no chemistry/layout. WHS Schedule 11 manifest triggers unaddressed.	No details submitted
Stakeholder engagement inadequate	General decision-making weight 21.3.1 P2(c)	41 questions unanswered; screening acknowledged as ineffective; no equine-specific studies commissioned.	Questions supplied, no answer

Relief Sought

Refuse the application for non-compliance with 21.3.1 P2(c), C8 (Scenic), C9 (Attenuation), Bushfire Code A2/A3/P1, C12 (Flood), and C7 (Natural Assets).

Alternatively, issue a Request for Further Information (RFI) requiring:

1. Stand-alone Glint & Glare Study – receptors mapped (arena, round yard, boundary paddocks, laneways, Bridport Rd), outputs by occurrence/duration/intensity and mitigation tested.

2. LVIA photomontages from private viewpoints within the equestrian facility and Bridport Rd.

3. Operational and construction noise modelling at equine receptors (incl. tonal penalties, worst-case met).

4. TFS-endorsed Emergency Management Strategy and Bushfire Hazard Management Plan (incl. BESS isolation/thermal, standoff, signage, water supply).

5. Flood Hazard Report by a suitably qualified person for C12.6.1 P1.1–P1.2 and C12.5.2 (if hazardous use applies).

6. Stormwater/WQMP demonstrating no increase to Back Creek peaks and no interception of spring/soak flows supplying the neighbour's lower dam.

7. Hazardous chemicals inventory and Schedule 11 screening (placarding/manifest/emergency plan if triggered).

8. Targeted wedge-tailed eagle survey and assessment (vantage watches, perch/flight-line mapping; July–January constraints).

Response to Planning Application DA-2025-15 – Pipers River Solar Farm

Submitted to: George Town Council
Date: 18.08.25
Regarding: Development Application DA-2025-15 – 5550 Bridport Road, Pipers River – TPS Energy Pty Ltd
Submitted by: C & J Waters

Introduction

This submission is lodged in response to the planning application for the proposed Pipers River Solar Farm at 5550 Bridport Road.

The purpose of this response is to set out clear, evidence-based grounds for objection under the Tasmanian Planning Scheme – George Town, focusing on the incompatibility of the development within the Agriculture Zone's assessment criteria, by confining and restricting the agricultural use that will be placed on our adjoining eastside property, safety risks posed, risks to environmental and protected species.

Property outline: 5456 Bridport Road, Pipers River, Tasmania
Commercial Horse Stud.
Paddocks: 20
Horses: 13
Holding Yards: 8
Areana :20x 60m
Round yard: 20m
Hay Shed: 9x21m
Paddock & Shelters: 6
Horse Runs :4
Foal Yards: 3
Grazing Paddock: 8

Given the **~90 m** proximity and direct line-of-sight across most active areas, routine use of the **arena, round yard and boundary paddocks** would present a foreseeable, unacceptable **spook/bolt** risk, rendering them effectively unusable for training and handling. This is **material interference** with a lawful agricultural/equestrian use and **fails Agriculture Zone 21.3.1 P2(c) and Attenuation Code C9.5.1 P1(a)**.

Fig.1 5456 Bridport Rd, property layout

Fig.2 Proposed Solar Array and adjoining property

Fig.3 Proposed solar array as visible from 5456 Bridport Rd (67% of property)

Single-panel visibility survey (method & finding).

To demonstrate how the proposal would affect the legitimate use of our existing agricultural/equestrian land, we installed **one standard PV module** (specifications at **Appendix 3**) at a **test location 99 m west of the eastern boundary fence**, positioned on the **proposed array edge** (i.e., **79 m inside the eastern edge of the proposed array boundary**; see **Figure 3**). From there, we undertook a **visibility audit from 69 mapped viewpoints** across the property (arena, round yard, all paddocks, horse day yards, handling area and float parking). The panel was **visually detectable from approximately 67% of the equine property**, demonstrating broad line-of-sight exposure to the future array. Detailed results, photos and coordinates are provided in **Appendix 2**.
Access to **5550 Bridport Rd** for the test was provided by **D. Barwick (TPG Consultant)**.

Summary of Grounds for Objection

This proposal is opposed on the following key grounds:

1. **Non-compliance with the Agriculture Zone purpose** – loss of productive grazing land and precedent for non-agricultural industrial use.

2. **Adverse impact on neighbouring horse training facilities** – noise, glare, movement, and potential spooking hazards within 20m direct line-of-sight.

3. **Non-Compliance with the Scenic Protection Code** - scenic value means the specific characteristics or features of the landscape that collectively contribute to a scenic protection area or a scenic road corridor

4. **Bushfire hazard** – Lack of bushfire management plan and increased ignition sources in a mapped bushfire-prone area.

5. **Non-compliance with the Attenuation code** – unreasonable impact of amenity of an existing sensitive use

6. **WHS storage of hazardous chemicals** - manifest quantity of hazardous on stored onsite

7. **Environmental risks, Natural Assets Code** – habitat loss, threatened fauna disturbance and waterway disturbance

8. **Flood-Prone Areas Hazard Code** — applicability & evidence

9. **Stormwater Runoff & Waterway Impacts (Back Creek)** – Affect on waterway and adjoining property

10. **Rebuttal to the Agricultural Assessment** – Adjoining Equestrian Property

11. **Stakeholder engagement** – Consultation and stakeholder engagement

12. **Battery Energy Storage System (BESS)** — insufficient detail, planning consequences, and Agriculture Zone fit

13. **Socio-economic assessment** - community benefits summary.

14. **No Glint & Glare study** – risk to equestrian operations

15. **Lack of screening proposal** – lack of even a proposed screening

16. **Reduction in adjoining property value** - purpose-built equestrian property with significant capital invested in arenas, yards and infrastructure.

17. **Insufficient information provided –** for council to properly assess impacts under the Planning Scheme / relevant Codes

18. Proposal Conclusion

19. Appendix and Annex

1. Non-Compliance with Planning Scheme and Zoning Intent

Under **21.1 Agriculture Zone Purpose Statements**:

21.1.1 seek to protect agricultural land from non-agricultural uses that preclude future agricultural activity or conflict with surrounding uses.

The proposal represents a significant conversion of Class 4 agricultural land to industrial-scale energy production.

21.1.2 (a) ***Conflicts adjoining properties agricultural use.***
Comment:
The adjoining eastern property is a registered horse stud and training facility for 12 years.
The glint, glare and noise from the proposed solar farm will affect 70% of our property (see appendix A).

21.1.2 (b) ***Use of land for non-agricultural use in irrigation districts***.
Comment:
The Tamar Irrigation Scheme – Tranche Three – Phase One, secured funding for the preliminary business case in December 2024. The scheme covers Beaconsfield, Legana, Rowella, Hillwood, Pipers Brook and Pipers River.
The business case is due to submitted in August 2025.
As the owners of 5456 Bridport Road, Pipers River, we signed onto the scheme in December 2023.

See Appendix 1 – Tamar Irrigation Agreement

Given the presence of high-value agricultural enterprises nearby, the conversion sets an undesirable precedent for replacing rural production with non-agricultural infrastructure.

21.3.1 P1 (a) ***Access to a specific naturally occurring resource on the site or on land in the vicinity of the site.***
Comment:
Suboptimal solar resource (persistent shading): The surrounding landform and vegetation make this a poor site for a solar array. A natural hill rising **35+ m** directly in front of the proposed field, combined with tall boundary trees (total visual barrier **~75 m**), will cast **recurring afternoon and winter shading** across large parts of the array. That means output will **not reach peak optimal performance** and claimed generation figures may be overstated—while the setting also intensifies visual bulk and landscape conflict along the rural frontage.

Seasonal yield + grid-charging = non-agricultural utility use: Local PV observations show winter output can drop by **~75%**, and this site already faces landform/vegetation shading. In those conditions, any battery units associated with the array would likely **import from the grid** to charge and then discharge at peaks—i.e., commercial energy arbitrage—not an agricultural activity. The applicant itself classifies the proposal as **Utilities – electricity generation (Discretionary)** and acknowledges it does **not directly service or support an agricultural use**. Under the Agriculture Zone, discretionary uses must **support agricultural use** and **minimise conversion to non-agricultural use**; this proposal does neither.

21.3.1 P2 (c) ***Whether the use confines or restrains existing or potential agricultural use on the site or adjoining sites.***

Comment:

The proposal would **confine and restrain** the established equestrian/agricultural use on the adjoining land.

Visual movement & reflections: Panel shimmer, shifting light bands, and service-vehicle activity are credible **spook triggers**, forcing the operator to **avoid or curtail** paddock turnout, track work, arenas and yards near the interface.

Noise disturbance: Inverter/transformer hum and irregular maintenance activity **disrupt training windows** and routine handling, elevating risk of bolts/falls and **restricting normal operations**.

Construction impacts: Heavy vehicles, reversing alarms and dust plumes render boundary paddocks/laneways **unsafe or unusable** for periods, **constraining day-to-day management**.

Contagion & recurrence: Horses are flight-prone; a startle in one becomes **herd-wide**, and because horses circulate across the property, exposure is **recurrent and mobile**, amplifying operational constraints.

Effect on future use & layout constraints: The interface impacts deter the ability to run the equestrian/agricultural operation as the paddocks are currently laid out; with the array visible from ~67% of the property, routine turnout, training and handling across boundary and central paddocks becomes a foreseeable, unacceptable risk of injury to riders/handlers and horses. This confines and restrains the ongoing and future use of the adjoining land**.**

Conclusion: By materially interfering with and constraining the neighbouring lawful equestrian/agricultural operation, the proposal **fails 21.3.1 P2(c)**.

2. Impact on Surrounding Land Uses (Horse Training Facility)

The proposed solar arrays are within **90 metres** of an established horse training facility, and in the **adjacent** grazing paddocks with **direct line-of-sight** to the panel field.

Concerns include:

Panel orientation adjoining property elevation. The 11,986 panels will be positioned to face north (000°), the layout of our property boundaries and paddocks is 327°, this creates an angle of 33° when viewed directly. Solar panels glass surface which is subject to glint and glare, will move with sun during daylight hours along with the changing trajectory of the sun over the seasons.

No visual proof from where it matters: The applicant provides **no photomontages or visual simulations from private receptors**—despite the array being visible from **~67% of the neighbouring equestrian property** (including paddocks, arenas and yards). Without LVIA imagery from these viewpoints, the true extent of visual impact on a sensitive agricultural/equestrian use cannot be assessed.

Visual movement and reflection: Horses are prey animals with panoramic peripheral vision and a low startle threshold. Sudden movement (maintenance vehicles, personnel, shifting light bands across panel rows as sun and cloud change) and unexpected specular flashes from modules, frames, fencing, battery housings or vehicles can trigger a **spook**—an explosive flight response. Startle is **contagious** in herd settings: if one horse reacts, others follow. The result is a foreseeable safety hazard across paddocks, training tracks, yards and laneways—riders unseated, handlers dragged, horses bolting into fences or structures, road near-misses, and injuries including lacerations, tendon damage and fractures. Because horses graze and circulate all day, exposure is recurrent and mobile, not confined to a single viewpoint or time of day.

Visual movement and reflection: Sudden glints, maintenance vehicle movements, and flashing reflections from panels can spook horses, risking rider injury.

Noise disturbance: Tonal inverter hum, transformer low-frequency drone, and intermittent maintenance alarms/impacts are potent spook triggers for horses accustomed to rural quiet—raising risks of bolts, falls, and injury.

Construction-phase disruption: Peaks of heavy vehicles and plant (low-loaders, gravel trucks, cranes), constant reversing alarms/percussive works, and dust plumes will **compromise equine training and welfare**—elevating spook/bolt incidents, respiratory irritation, eye injuries, unsafe footing, and rider/handler injury risk.

Constitutes an unreasonable and direct interference with the established, lawful equestrian/agricultural use on the adjoining land. 21.3.1(c)

See Appendix 2 – Panel Simulation Receptor Points 1-69
See Appendix 3 – Solar Panel Simulation Specifications

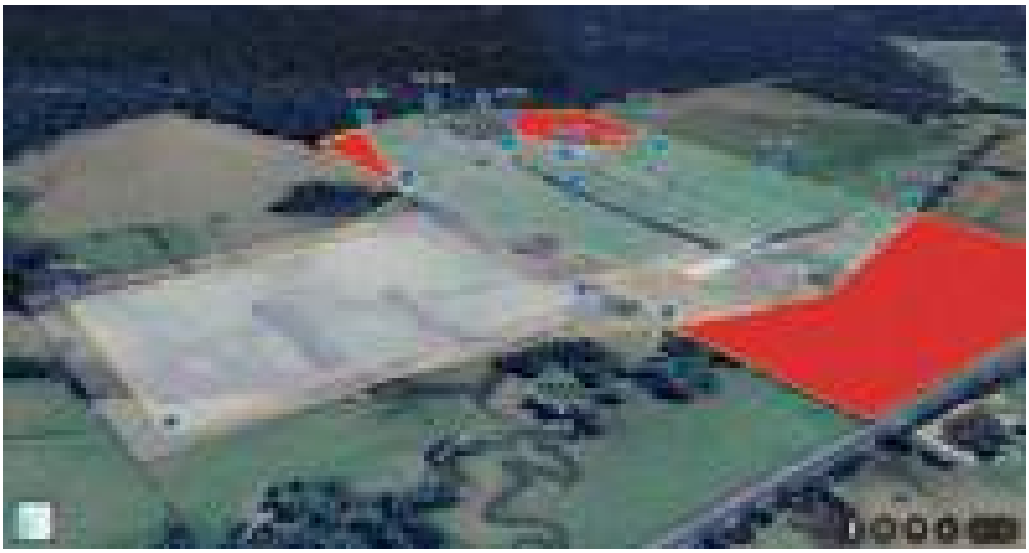


Fig.4 Elevation and effect of proposed solar array on 5456 Bridport Rd

3. Non-Compliance with the Scenic Protection Code

The site falls within the **Bridport Road Scenic Road Corridor (C8.0)**, where management objectives are to preserve open rural vistas and avoid intrusive development.

C8.6.2 **Development within a scenic road corridor**
Objective: That:
(b) buildings and works do not cause an unreasonable loss of the scenic value of scenic road corridors.
Performance Criteria; P2

Buildings or works within a scenic road corridor must not cause an unreasonable reduction of the scenic value of the road corridor, having regard to:

(a) the topography of the site;
Comment;
The proposed panel array is situated over rising gradient ranging from ~94 (eastern side) at its lowest point to ~105m at its highest (western side).
The stated installed panel height is 3.269m above ground level
The Bridport road rises on gradual slope from east to west, measures 96m on the eastern edge of the boundary fence (proposed development) to 105m at the end of the straight.
When view from varying places along the scenic road corridor the panels will rise 14.3m above ground level from inside the designated development area and up to ~7.64m at ground level along the scenic road corridor.

Fig.5 95% of the panel array will be visible from Bridport Rd, scenic route

(b) proposed reflectance and colour of external finishes;
Comment:
Industrial character incompatible with rural setting: An industrial-scale, 11,986-panel installation enclosed by a galvanised high-security fence will be plainly visible from Bridport Road. The compound, internal panel blocks and associated infrastructure read as a continuous, engineered form that is incongruous with surrounding farmland and does not blend with the rural landscape, resulting in a clear adverse impact on rural character and scenic corridor values.

(c) design and proposed location of the buildings or works;
Comment:
Due to the rising slope of the land, the panel field is upslope of the road corridor, making the rows appear taller and more prominent to road users and neighbours. The rectilinear, contiguous block layout, combined with perimeter security fencing and service infrastructure, reads as a single engineered mass rather than dispersed rural elements. Positioned within established sightlines and only intermittently screened by patchy tree cover, the array will present year-round visual exposure (especially in winter when foliage is sparse), resulting in a dominant, non-recessive form inconsistent with the surrounding rural landscape. (d) the extent of any cut or fill required;

(e) any existing or proposed screening;
Comment:
Existing vegetation is patchy and discontinuous (shelterbelts/windbreaks with gaps at gateways, creek lines and low points). On the upslope alignment, these belts sit below the panel field from key road and neighbouring viewpoints, so they do not intercept sightlines to a 367 m × 234 m compound. Seasonal thinning further reduces screening effectiveness in winter when visual contrast is highest. The application proposes no additional screening. Even if perimeter planting were proposed now, it would take years to achieve sufficient height and density to address the bulk and apparent height of the panels—and would most likely remain patchy in nature due to species form, wind pruning, maintenance gaps and the site's topography—leaving a long-term period of unmitigated exposure to Bridport Road scenic corridor.

See Appendix 4 – Solar panel visibility from Bridport Rd

(f) the impact on views from the road; and
Comment:
For travellers on Bridport Road (Scenic Road Corridor), the array will present a sustained, unobstructed view of an industrial-scale compound (≈367 m × 234 m, high-security fence, multiple module blocks). The straight alignment and long sight distances create prolonged viewing durations in both directions. Because the land rises away from the road, the panel rows read taller and more prominent, while existing shelterbelts are patchy and sit below the sightline, offering little interception—especially in winter. The result is a dominant engineered foreground plane replacing open farmland, with intermittent glint and service-vehicle movement adding visual distraction for drivers at 100 km/h, undermining the scenic values of the corridor.

See Appendix 5 – Solar panel array height simulation

4. Non-compliance with the Bushfire-Prone Areas Code

Context: (Hazardous use)
The proposal includes BESS of 22,016kWh
The approximate weight of such a system depending on the technology used would be approximately **110,000kg or 110 Metric Tonnes.**
To estimate weight;
1. **Calculate Total Energy:** 22MWh = 22,000kWh = 20,000,000Wh
2. **Estimate energy density:** Lithium batteries have an energy density of between 15-250 Wh/kg
Let's assume 200Wh/kg for these calculations
3. **Calculate Approximate Weight:**
Weight = Total Energy / Energy Density
22,000,000 Wh / 200Wh/kg = 110,000kg or 110 Metric Tonnes
This a rough estimate, the BESS included in the project would depend on the technology used, cell configuration and packaging.

Why is this important?
It means that the proposed development is guided by the Work Health and Safety (WHS) regulations in regards to 'Manifest Quantity of Hazardous Chemicals' stored in a workplace for lithium batteries, *one where the total combined lithium batteries being, used, handled, stored or installed exceeds a specified threshold.*
For lithium batteries, in Tasmania this threshold is 2,500 – 10,000 kg or more according to Worksafe Tasmania. When a workplace exceeds these quantities, it's required to maintain a hazardous chemical manifest.

C13 Bushfire-Prone Areas Code

C13.3.1 Definition of terms in this Code:
Term:
hazardous use
Definition:
means a use where:
(a) the amount of hazardous chemicals used, handled, generated or stored on a site exceeds the manifest quantity as specified in the Work Health and Safety Regulations 2012; or

C13.5.2 Hazardous uses
Objective:
Hazardous uses can only be located on land within a bushfire-prone area where tolerable risks are achieved through mitigation measures that take into account the specific characteristics of both the hazardous use and the bushfire hazard.

Performance criteria P1:
A hazardous use must only be located in a bushfire-prone area if a tolerable risk from bushfire can be achieved and maintained, having regard to:
(a) the location, characteristics, nature and scale of the use;
Comment:
The site is mapped bushfire-prone and the proposal comprises an industrial-scale PV utility (≈11,986 panels) with inverters/transformers and a BESS inside a 2.1 m security-fenced compound on rising ground with adjacent vegetation. Its nature (continuous DC generation and stored chemical energy) and scale (extensive cabling, large module surface area, multiple plant enclosures) elevate both ignition likelihood and consequence. The rural, limited-access location, proximity to a 100 km/h scenic road and a neighbouring equestrian/agricultural operation, and the absence of an endorsed, use-specific emergency strategy mean a tolerable risk has not been demonstrated or shown maintainable over the project life under P1(a)

(b) whether there is an overriding benefit to the community;
Comment:
No overriding community benefit has been demonstrated. In particular, the proposed battery energy storage system (BESS) is not tied to any public service outcomes (e.g., guaranteed outage back-up for the locality). Given the site's shading and winter under-performance, the BESS would likely import grid energy and discharge at peak—i.e., operate as a commercial arbitrage asset. Any gains accrue privately to the proponent, while round-trip losses and market effects provide no assured benefit to local consumers. Against this, the community bears concrete local disbenefits: scenic corridor impact, construction and traffic disturbance on a scenic corridor, heightened bushfire/BESS hazard and responder risk, and material interference with the neighbouring equestrian/agricultural operation. A privately captured trading benefit does not outweigh these site-specific harms; therefore, an overriding community benefit is not shown.

(c) whether there is no suitable alternative lower-risk site;
Comment:
The applicant has provided no alternatives assessment (site selection matrix, constraints mapping, or multi-criteria analysis) to demonstrate that this location is the only viable option. On the contrary, multiple lower-risk site typologies exist that would avoid or materially reduce the impacts identified here:

Industrial/brownfield land (e.g., within or adjacent to the Bell Bay industrial precinct), already characterised by utilities and hardstand, outside scenic road corridors and sensitive rural receptors.

Lower-capability rural land (Class 6–7) or Rural/Utilities-zoned tracts without equestrian/agricultural interfaces, steep upslope views, or waterway buffers.

Sites outside mapped bushfire-prone areas or with demonstrably lower fuel loads and clearer appliance access.

Locations not visible from Bridport Road's Scenic Corridor and not in direct line-of-sight to an equestrian facility.

Co-location with existing substations/linear infrastructure or use of industrial rooftops/parking canopies, reducing new ground disturbance and visual bulk.

Sites without uphill horizons or tall boundary vegetation should be selected to ensure maximum PV productivity; otherwise, converting agricultural land to a commercial utility is unjustified given the avoidable efficiency losses at this location.

Proximity to a single 22 kV pole or local line does not establish necessity at this exact site; comparable connection opportunities exist along the network and should be evaluated against landscape, safety, and land-use conflict risks. In the absence of a transparent alternatives study showing that no feasible lower-risk site is available, the proposal fails P1(c).

(d) the emergency management strategy and bushfire hazard management plan as specified in A2 and A3 of this Standard; and
Comment:
Neither a TFS-endorsed Emergency Management Strategy (A2) nor a certified Bushfire Hazard Management Plan (A3) has been provided. Accordingly, the proposal does not demonstrate how tolerable bushfire risk will be achieved and maintained over the project life. There is no documented provision for ignition prevention, fuel-load management/APZs, fire-appliance access and water supply, PV/BESS isolation and arc-flash controls, BESS thermal-runaway/emissions management, standoff distances, responder safety protocols, or incident mapping/signage. In the absence of these A2/A3 deliverables, the use fails P1(d).

(e) other advice, if any, from the TFS.
Comment:
The application file contains no Tasmanian Fire Service (TFS) advice or evidence of consultation. Council therefore has no TFS position to consider on key matters for a hazardous PV/BESS utility (e.g., appliance access, water supply, isolation and responder safety, compartmentation, emissions management). In the absence of documented TFS input, the decision-maker cannot be satisfied that a tolerable risk can be achieved and maintained, and P1(e) is not met on the information provided.

Acceptable Solutions A2
An emergency management strategy, endorsed by the TFS or accredited person, that provides for mitigation measures to achieve and maintain a level of tolerable risk that is specifically developed to address the characteristics, nature and scale of the use having regard to:
(a) the nature of the bushfire-prone vegetation including the type, fuel load, structure and flammability; and
Comment:
No **Emergency Management Strategy** endorsed by TFS or an accredited person has been provided. The site is mapped bushfire-prone and the proposal introduces credible ignition sources (PV modules, inverters, battery units, construction plant) within a 2.1 m fenced compound. In the absence of an endorsed, use-specific strategy addressing vegetation type, fuel load, structure and flammability, the application **does not demonstrate tolerable risk** and **fails A2**.

(b) available fire protection measures to:
(i) prevent the hazardous use from contributing to the spread or intensification of bushfire;

Comment:
The application **does not demonstrate** how the proposed PV/BESS utility will avoid becoming a fire load or vector. There is **no TFS-endorsed strategy** showing (1) fuel-free setbacks or non-combustible zones within the compound, (2) vegetation/fuel-load management inside and adjacent to fencing, (3) separation/isolation between inverters, transformers, battery units and cable routes to limit lateral fire spread, (4) containment and isolation arrangements for **battery thermal events** (thermal runaway, venting), (5) materials specification for perimeter fencing, cable trays and enclosures to avoid propagating fire, or (6) site layout features that compartmentalise plant to prevent escalation. In the absence of these specifics, the proposal **fails A2(b)(i)** for hazardous uses under the Bushfire-Prone Areas Code

(ii) limit the potential for bushfire to be ignited on the site;
Comment:
The application does not demonstrate how ignition sources will be limited, as required under A2(b)(ii) of the Bushfire-Prone Areas Code. There is no endorsed emergency management strategy identifying ignition pathways or controls for PV/DC cabling and terminations, inverters/transformers, any BESS units, construction plant/vehicles (including parking on cured grass), hot works, or fault/arc events—nor any weather-triggered operational constraints, fuel-load standards, or lightning/over-voltage protection specifications. Despite including local fire history mapping within 1 km, the proponent asserts the Code "does not apply," leaving ignition risk unaddressed. Accordingly, the proposal fails A2(b)(ii).

(iii) prevent exposure of people and the environment to the hazardous chemicals, explosives or emissions as a consequence of bushfire; and
Comment:
The application does not demonstrate how exposure to hazardous chemicals or emissions will be prevented during a bushfire event, as required under A2(b)(iii) of the Bushfire-Prone Areas Code. The Code expressly expects an endorsed emergency management strategy addressing this issue, yet none is provided.

Comparable material for the Cimitiere Plains solar farm acknowledges that combustion of PV components (e.g., backing sheet/EVA) can produce hazardous gases requiring breathing apparatus—underscoring the relevance of A2(b)(iii) for solar installations. The current application provides no inventory of hazardous materials, no discussion of potential emissions, and no controls to prevent exposure for neighbours, road users, livestock, or responders.

A **battery energy storage system (BESS)** fire presents distinct hazards that the application does not address. In a bushfire or fault scenario, lithium-ion cells can enter **thermal runaway**, producing **high-temperature jet flames** and **recurring re-ignition** over many hours or days. Off-gassing generates **toxic and corrosive vapours** (e.g., hydrogen fluoride and other acidic/irritant gases), creating harmful **smoke plumes** for neighbours, road users and livestock (heightened risk for horses with sensitive airways). Enclosure off-gases can accumulate and **deflagrate** (over-pressure event) if not safely vented, endangering responders and bystanders. Fire-water used to cool or control a BESS event can become **contaminated runoff** (dissolved metals/electrolyte by-products), resulting in **soil**

and water contamination of adjoining paddocks, creeks and stock dams. **Radiant heat** and ember production from a BESS/plant fire also raise the risk of **escalation** to nearby vegetation and structures. None of these BESS-specific exposure pathways (to people, animals, or the environment) are identified or managed in the application, so it **fails to demonstrate** compliance with A2(b)(iii).

Further, the applicant asserts the Bushfire Code "does not apply," despite the site being mapped bushfire-prone—leaving A2(b)(iii) entirely unaddressed. This is a material deficiency preventing assessment of tolerable risk.

(iv) reduce risk to emergency service personnel.
Comment:
The application does not demonstrate how risks to first responders will be reduced. There is no pre-incident plan, no documented PV/BESS isolation procedures (arrays remain energised in daylight; back-feed/arc-flash risk), and no standoff distances or hazard characterisation for BESS thermal events and off-gassing. Access provisions are uncertain (all-weather appliance access, load ratings, turning heads, perimeter routes, overhead clearances), while a 2.1 m security fence and locked gates create potential entrapment/egress issues. There is no inventory of hazardous materials/SDS, no signage or site mapping, and no confirmation of on-site water supply for firefighting. In this state, the proposal fails to show that risk to emergency service personnel is acceptably reduced under A2(b)(iv).

Acceptable Solutions A3
A bushfire hazard management plan that contains appropriate bushfire protection measures that is certified by the TFS or an accredited person.
Comment:
No BHMP certified by the TFS or an accredited person has been provided. Given the site is mapped bushfire-prone and the proposal introduces hazardous utility infrastructure (PV/BESS, inverters, cabling within a fenced compound), the absence of a certified plan means the application does not satisfy Acceptable Solution A3 and cannot demonstrate that appropriate bushfire protection measures will be in place.

Recent bushfire history:
The application's reliance on LISTmap "detailed recent bushfire history" is inaccurate/incomplete. In late 2023, a dry-lightning ignition occurred in the reserve behind our property. The fire burned through the reserve and approximately 1 hectare of native forest on our land, then ran down the western boundary toward the applicant's property, and was contained only by heavy machinery and the TFS. Had the fire reached the fodder paddock, it is reasonably foreseeable it would have spread through our property and adjoining properties. This recent, local incident demonstrates a higher site-specific ignition and spread risk than the applicant depicts, undermines any claim that bushfire risk is low or that the Bushfire-Prone Areas Code is inapplicable, and confirms that a tolerable risk has not been demonstrated on the information provided.