



8 August 2022

Ms Lizzie Blandthorn  
The Hon. Minister for Planning  
Level 16  
8 Nicholson Street  
East Melbourne VIC 3002

Via email : [planning.panels@delwp.vic.gov.au](mailto:planning.panels@delwp.vic.gov.au)  
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Dear Minister

**Environment Effects Statement (EES) and Planning Permit Application  
P2201620 - Willatook Wind Farm**

Council has resolved at its meeting of the 2 August, 2022 to make a submission opposing and objecting to the EES and Planning Permit Application for the Willatook Wind Farm.

Additionally Council requests to be heard at any Panel convened to consider the project and submissions to it.

Council's submission will be based on a technical assessment of the proposal, how the project responds to the planning policy framework of the Moyne Planning Scheme, and advocacy on behalf of its community.

Moyne Shire has lived experience of wind farm development and in its role as responsible authority for administration and enforcement of planning permits issued for projects, wishes to inform you and the Panel of the challenges faced on a project and Shire wide basis.

Council's current resolution is to oppose all new wind farms in Moyne. Its draft position is to seek that the State government pause the issue of any new wind farm planning permits until such time that strategic land use planning is carried out for the South West Renewable Energy Zone (SWREZ), introduces a 5km setback from townships, undergrounds transmission infrastructure and has a decommissioning strategy.



Key elements of this submission relate to:

### Cumulative Impacts

The western cluster of wind farms in the Shire already has 244 turbines approved, over 4 wind farms. Adding another 59 turbines leads this to over 300 turbines in the landscape.

*Proximity to settlements* – the wind farm is to be sited 4km north-east of the township of Orford. Council is concerned that this is too close and is seeking a minimum 5km buffer between any settlement and a wind farm to limit amenity impacts of noise, electromagnetic interference, and impact on viewsheds. Conversely, it also seeks this 5km buffer to allow, unencumbered, the potential development and growth of any town.

*Viewsheds* – whilst the planning framework sets out the standards for presenting impacts on viewsheds, there needs to be consideration of the real impacts versus the technical assessment. The social impacts of living in a changed landscape cannot be dismissed or planted out.

Additionally, the reliance on existing windrows for screening needs further consideration as the age and health of the trees has not been factored into the assessment. Some landowners may be relying on the goodwill of their neighbours to retain shelterbelts to obscure the visual impact.

### *Construction Impacts*

Whilst limited to a 2 year framework, the short term impact of construction is significant and raises community concern. Council's experience is that the importance of the regulatory framework established by any issued planning permit is of lost in translation between the hierarchy between permit holders and contractors on a site.



Lack of adequate management leads to construction impacts such as:

- Road construction occurring in winter which increases costs
- Light vehicle traffic numbers underestimated and uncontrolled
- Approved access points not always used
- Biosecurity arrangements between properties need to be adhered to.
- Change in working hours sought at last minute due to weather impacts
- Need to build in infringements frameworks to create an easy compliance pathway within management plans
- Housing impacts

#### Traffic Impact Assessment

Woolsthorpe –Heywood Road at the development site is not fit for purpose. It has been rated one of the poorest quality rural roads in Victoria. The impact assessment has recognised that the road need to be upgraded for the project and such upgrade should occur prior to on-site construction occurring (other than the on-site quarry establishment).

Light Vehicle impacts are underestimated in project construction but need to be factored in as this is a significant change to traffic volumes and use. Use of non-approved local traffic routes largely occurs by the light vehicle fleet. Commensurate maintenance, upgraded entrances, and impact on agricultural uses such as stock and machinery movement across seasons is not well canvassed in the TIA.

Traffic Management Plans need to incorporate the use of Road Quality Auditors, maintenance regimes and commitments to ensure safety of all road users.

#### Aviation

The Warrnambool Airport is of strategic importance for the region. The economic benefits of the airport and growing passenger and freight services in the region cannot be understated. The EES seeks a change to approach measurements to allow full turbine height, particularly relevant to 5 turbines. Based on the agent of change principles, the Willatook wind farm should have no impact on the existing airport and should modify turbine height to comply.

#### Cumulative impact to aerial spraying

Aerial spraying as part of farming activities is a concern raised in every wind farm proposal. The cumulative impact of being able to continue to spray aerially needs to be considered having regard to this proposal, the existing Macarthur wind farm and the three proposed wind farms being Ryan Corner, Hawkesdale and Woolsthorpe.



### Environmental impacts

Brolga – there are existing interim controls for Brolga consideration whilst new guidelines have been released for community consultation that incorporate no-go zones. The status of brolgas as a threatened species is raised in many of the community submissions.

Again, Council should encourage the Panel to consider data collected from both proposed and operational wind farms in considering the impacts of this wind farm on this species.

### Waterway management

Council is expecting that the Glenelg Hopkins Catchment Management Authority will make a detailed submission. The Shaw River and Moyne River run through the site and construction impacts need to be carefully managed including works on waterway permits being issued.

### Biosecurity between farms

As a wind farm involves multiple land holdings, biosecurity to protect existing agricultural operations is an issue. Environmental management plans create a complex suite of measures during both construction and operation. Improvement to this framework is required to deliver better on site outcomes on individual properties and between farms including access, weed control, road construction, stack and stockpile sites and use and rehabilitation. Again, ensuring key indicators for action and compliance is required having regard to any plan being endorsed as a planning permit associated document.

Learnings from 10 years of reporting – BAM plans for operational wind farms have required reporting for at a minimum the first 2 years of operational wind farms. The results should be consolidated and assessed as part of the consideration of this and future projects.

### Community Concerns

Noise – Council acknowledges that noise is now the remit of the EPA but this is the single largest concern of the community. The accuracy of the background noise assessment, and how complaints will be assessed requires consideration. The technical assessments show that cumulative noise from other windfarms should be within the limits set by the NZ standard. What it fails to acknowledge is that some of our landowners may be subject to constant turbine noise due to the siting of turbines from various wind farms and wind coming from different directions and may not get any reprieve.

The recent Supreme Court decision relating to the Bald Hills Wind Farm should be examined as part of this assessment. Background and predictive noise assessment



must be reviewed to ensure accuracy and rigour has been applied so that amenity, particularly at night, meets the required NZ standard.

### Community Benefit Sharing

Whilst sitting outside the regulatory process, the community benefit sharing and neighborhood payment schemes are a key element of project development. Benefit sharing programs need to be recognised in some way to ensure any project approval does not undermine any community trust built on the basis of community benefits.

Additionally, local employment, contractor selection, local % being built into projects needs active consideration. Council has an expectation that local content should be part of securing and investing in the Shire.

Local content has been embedded in VRET (Victorian Renewable Energy Targets) Auction schemes and should be similarly applied to all projects. It must be considered having regard to the social and economic impact assessment study.

The community benefit sharing approach outlined provides a modest level of local contribution. Given comparable windfarms and the development of the industry this is a disappointing outcome. The cumulative impact of multiple projects in Moyne needs to drive substantial community benefit beyond that outlined and needs to consider a system of indexing the offer over the life of the project, providing an additional regional contribution.

### Reliance on Planning Permit

Council is concerned that after such a lengthy and detailed EES process that there should not be a need for extensive management plans. Additionally, the management plans are written by subject matter experts and do not provide a satisfactory planning compliance outcome. The framework for such plans needs to be further considered if a planning permit is issued for this project.

Council, through its lived experience wants to provide permit conditions that facilitate active compliance and ease of monitoring.

### Learnings from other projects

Council is in the position where it can provide valuable insights and learnings from multiple wind farm projects. Data collected from various permits, management plans and complaints processes should be analysed when considering this project.

DELWP should take a lead in this regard.



Lack of Strategic planning to support wind farm

The state government through Vicgrid has just commenced transmission planning. Part of this process has involved identifying the need to carry out strategic land use planning. Key to this work is Council's interim wind farm position which seeks a pause on the issue of all new planning permits for wind farms until this work is completed, including setting a threshold for the number of turbines in Moyne.

Conclusion

Council requests the opportunity to be heard at Panel.

Please contact Michelle Grainger, Manager Energy Projects, on 5558 7860 or 0408987357 or via email at [mgrainger@moyne.vic.gov.au](mailto:mgrainger@moyne.vic.gov.au).

Yours faithfully

Ian Smith  
**Mayor**