



Enquiries to: Michelle Grainger
Telephone: (03) 5558 7860
Our ref: 2006-0221-2 Hawkesdale

10 November, 2021

Minister for Planning
c/ DELWP
8 Nicholson Street
MELBOURNE VIC 3000
Email: developmentapprovals@delwp.vic.gov.au

Dear Minister Wynne,

2006-0221-2 Hawkesdale Wind Farm – Amendment to Planning Permit Application

Council takes this opportunity to make a submission to the amendment to planning permit application on notice for the Hawkesdale Wind Farm and asks that consideration is given to the following matters:

The nature and extent of changes proposed by the amendment application for the wind farm outlined in the attached notice;

Council supports:

- Administrative corrections to the permit preamble to accurately update and describe the land to which the permit applies.
- Amending the address of the land to update title details.
- Revising the wind turbine model.
- Amending Condition 11 (d). Council has approved a Traffic Management Plan (Version 14) and advised the permit holder of this

Council objects to :

- Re-wording of Condition 3(d) to reflect removal of shorter (160 metre high) turbines. Council does not object to reduction in the number of turbines however it objects to the nominated turbines.
Council is not convinced that there is any planning merit to removal of the 3 turbines as submitted by the permit holder. The amendment application, in addressing this matter fails to provide any significant justification that supports the removal of the 3 smallest turbines.

Council has previously made submissions to you and the permit holder GPG that the wind farm is located too close to the township of Hawkesdale. Any removal of turbines should be based on planning principles to protect the amenity of the locality.

The township of Hawkesdale should warrant a higher amenity threshold than dwellings on surrounding farming land. Therefore in the interests of securing the best land use outcome the 3 turbines to be removed from the wind farm layout should be those closest to the town. Council strongly submits that if any turbines are to be removed then they should be Turbines A 19, A 21, and A 23.

Council seeks to draw your attention to Clause 19.01-25 Renewable Energy to support this view where the provisions seek to ensure appropriate siting and design consideration are met in promoting the provision of renewable energy and in particular:-

“Considering the economic and environmental benefits to the broader community of renewable energy generation while also considering the need to minimise the effects of a proposal on the local community and environment”.

- The removal of Condition 4 – landscaping of the on-site substation should still be required and be planned and located having regard to the issues raised in the bushfire management plan.

An onsite substation has an industrial appearance and is at odds with the rural landscape of the farming zone. The existing conditions to landscape the substation should be amended, not deleted as requested, to require a greater buffer between the substation and the planting to ensure bushfire safety.

Any significant detrimental effects which the amendment will have on the use and enjoyment of land;

As the wind farm is close to the town of Hawkesdale, Council requests that the Minister consider the noise impacts from the wind farm having regard to the NZ Standard NZS 6808:2010 Acoustics – Wind Farm Noise, should special audible characteristics be considered? This would apply an additional 5dB threshold set above the 40dB noise output. In particular, I ask that you consider this having regard to the decision of the Golden Plains Wind Farm and its proximity to the Rokewood township.

In particular, and at a minimum, from a noise perspective, the updated turbine model, should be referenced having regard to the Background Noise assessments that were submitted to accompany the extension of the permit in 2020.

Condition 3 outlines turbine specifications, it would benefit from including the maximum sound level which the turbine can emit.



Council has carried out its own background noise assessment for the Hawkesdale Wind Farm and can provide the Minister with the technical assessment report if that would assist your assessment of the amendment application.

The content of the Moyne Planning Scheme provisions as they relate to the amendments proposed for the wind farm.

The Moyne Planning Scheme, and in particular Clause 52.32 – Wind Energy Facilities has been amended since the issue of the amended permits in 2017. The Environment Protection Act 2017 now assigns the EPA as the primary regulator for compliance with the New Zealand Standard for Acoustic Noise from Wind Turbines as of 1 July, 2021.

Council raised this issue with the permit holder seeking further changes to this amendment application. The permit holder has agreed to seek to update the noise related conditions during the construction phase of the permit and prior to commissioning of the turbines.

Council requests the Minister to amend and update the noise conditions of the permit to reflect the current planning scheme requirements now, as part of this amendment application. This is in the interests of reducing regulatory burden on Council as the responsible authority for administration and enforcement of the planning permit.

Advocacy on behalf of its community

Council, whilst the amendment application has been on notice has consulted with its community.

Concern has been raised regarding the wind farm changing the nature and character of the Hawkesdale township. The Hawkesdale and District Development Association Committee (HADDAC) is concerned that the wind farm may potentially have a negative effect on the growth and development of the town. Additionally, it has noted the stress this is causing some residents. Consultation from the permit holder has been limited and it queries the public claims of contact being made with those within 5km of the wind farm stated in newsletters.

Off-site impacts such as noise, visual amenity, concern about bushfire safety and impacts on the Hawkesdale P12 School have been raised.

In particular, with the specification of a new wind turbine model being nominated the issues of noise emissions, compliance with the standard and data to support the revised model should be interrogated. The lived experience of the Macarthur Wind Farm located approximately 10 km from Hawkesdale raises anxiety for the community. Council has heard there is limited local support for the development of the wind farm and the major concern relates to noise disturbance.



Cumulative impacts have been raised noting the adjoining Woolsthorpe Wind Farm and Ryan Corner Wind Farm are seeking to start construction at a similar time to Hawkesdale Wind Farm, that along with the existing Macarthur Wind Farm will create a cluster of turbines.

Fire Management has been raised including how the surrounding road sides will be managed to limit fuel loads. Aerial firefighting should not be limited due to the presence and the cumulative impact of many wind farms in the district.

The amendment application as it relates to flora and fauna should ensure wetlands have been mapped and impacts on birds in particular reassessed.

Scepticism exists in the community that those who may be offered benefits schemes such as host and neighbouring landholders are limited in their right to voice concerns or lodge complaints.

Any revised turbine layout should ensure that they are not located any closer to boundaries than what has been previously approved. Limitations on being able to construct buildings on surrounding farm land should not be increased by the siting of wind turbines.

Devaluation of property has been raised as a concern by some members of the community.

Council has heard that the community is concerned about the lack of consultation by the permit holder with the local community on why it is seeking to amend its permit. This includes feedback from participating landholders, neighbours and those within 5km of the windfarm.

Additionally, the framework and role of the Environment Protection Act 2017 and the general environmental duty obligations have been cited as a major change to the policy framework for wind farms.

It has been suggested that if the amendment applications are to be supported than they should be scaled back by reducing the number of turbines by 70%, reducing the size of the turbines by 60% and turning the turbines off between overnight from 7pm to 7am and during school holidays and on public holidays.

Conclusion

Council thanks you for the opportunity to comment on the planning permit amendment applications.



Council is the responsible authority for administration and enforcement of the planning permit and amendments to it for the Hawkesdale Wind Farm. As such Council seeks that any amendment to conditions or approval of management plans carefully considers wording to ensure the permit provide for measurable and quantifiable outcomes.

Again I wish to reiterate in conclusion that the primary concern Council seeks you to address in considering this planning permit amendment application is to ensure the 3 turbines to be removed from the development are the 3 closest to the township of Hawkesdale. Increasing the buffer between the wind farm and the township is seen as a crucial measure to protect the amenity of the town.

Please contact Michelle Grainger, Manager Energy Projects (5558 7860 or mgrainger@moyne.vic.gov.au) should you wish to discuss this submission further.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Daniel Meade". The signature is fluid and cursive.

Daniel Meade
Acting Mayor