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5<sup>th</sup> October 2020

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DELWP  
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Dear Mitchell

**RE: PLANNING PERMIT NO. PA2000877**  
**WIMMERA PLAINS WIND ENERGY FACILITY**  
**REQUEST FOR FURTHER INFORMATION**

We refer to your request for clarifications to our response to further information in relation to the above application.

### 1 Planning Reports

*Two reports accompany the application – one in Volume 1 and the other as part of Volume 2. For our reference what is the intent of these two different documents – it would seem the Volume 1 report doesn't add any additional information, but combines information and plans found elsewhere?*

**Response:** Correct. The report in Volume 1 is a summary report bringing together all the information. The Planning report in Volume 2 expands in more detail on the planning considerations and how the proposal responds to the various planning provisions.

### 2 Aeronautical Assessment re MSA

*For context, during the approval of the Jung Wind Farm, the aeronautical report supplied with that application recommended that the MSA (Minimum Sector Altitude) of Horsham Airport would need to be raised to accommodate the proposed wind farm. The report also said "the 10Nm and 25 Nm MSA associated with Warracknabeal Airport will be penetrated by the maximum blade tip height of 380m AHD and would require amendment for compliance".*

*Correspondence with Air Services Australia attached to that report confirms the need to amend the MSA of both airports and the requirement to do this was included as C35 on the Jung WF permit.*

*The wind turbines proposed under the current application surround the Jung Wind Farm on all sides and are taller than the approved Jung turbines. Yet, the aeronautical assessment provided with this application only proposes to amend the MSA of Horsham Airport. Can you seek comment from your experts about why amendment to the MSA of Warracknabeal Airport is not needed for this wind farm? Or has that MSA already been amended as required by the Jung permit? If so, can you provide confirmation of this?*

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**Response:** The Wimmera Plains Energy Facility was assessed against the Instrument Approach Procedures current as at 7 November 2019 and they have not been changed since. The current AIP shows those charts for Warracknabeal to have a current edition date of 7 November 2019. These show that the conditions for Jung have been published.

They show the 10 NM MSA for Warracknabeal as 2300 ft AMSL. If we take the 1000 ft Minimum Obstacle Clearance margin off this figure we get a PANS OPS surface of 1300 ft.

The highest WTG for WIM is 1290 ft AMSL. When we add the 1000 ft Minimum Obstacle Clearance margin to it we get 2290 ft which is below the PANS OPS surface of 2300 ft. If this highest WTG was the determining obstacle, then the 10 nm MSA for Warracknabeal would remain at 2300 ft – it is always rounded up to the next 100 ft interval. This enables pilots to readily conform to the MSA by reading of the altimeter which is scaled in 100 ft increments.

The Wimmera Plains EF does not infringe any PANS OPS surfaces associated with Warracknabeal.

The instrument approach charts for Horsham have been amended and show a 10 NM MSA of 2300 ft.

Appendix A contains both current charts.

### 3 Application Form

*The submitted Permits Online application form doesn't include all the lots to which the planning permit relates. I would recommend attaching the table of all relevant lots featured elsewhere in the application to the standard pdf application form and resigning to confirm that all landowners have been notified of the application being made.*

*Also, the description of what the application is for may have been truncated.*

**Response:** The application form has been updated to reflect the long form application description and includes all the land owners attached in Appendix B.

### 4 Traffic Management Plan

*The map of blade transport route at Appendix A appears to be incorrect. The report describes this route as going through Nhill, but the map doesn't show this. I have held off referring the application to DoT before this is corrected.*

**Response:** The three maps relating to this issue have been updated to be one plan which shows the correct route. This is the only change to the Traffic Report prepared by Impact. An updated Volume 2 has been provided to reflect this change.

### 5 Signed Landowner Agreements

*We require copies of the signed landowner agreements to verify that the relevant landowners have consented to waive the noise and shadow flicker requirements for wind farms stipulated in the planning scheme.*

**Response:** The Landowner Agreement for the one involved landowner within 1km (dwelling 4) is attached in Appendix C.

### 6 Development Plans

*Are the Development Plans in Volume 3 the same as those included in the Volume 4 "map book"?*

*Can you please provide an indicative elevation of the above ground powerline connecting the two proposed substations? Including information re materials of construction?*

*The Noise Audit specifies that the turbine blades relied upon in the noise modelling have special "Serrated trailing edges (for noise control)" – can you please provide amended elevations of the turbine that specify this?*

**Response:** There were some modest inconsistencies between the plans contained in Volumes 1 and 4 previously submitted. Updated versions of these Volumes are now being submitted. The changes are:

- Updated Site Plan on page 42 of Volume 1
- Updated Site Plan on pages 11 and 32, and updated Map Extents on pages 42 and 43 of Volume 4.

The transmission line connecting the two substations will be supported by a series of tapered steel poles of between 36m and 42m in accordance with Powercor standards (Appendix D). Cables spanning between poles will be generally above 9m minimum ground clearance and maintained in accordance with the ground clearance requirements of AS/NZ 7000:2016. Cables will be made of aluminium alloy.

The serrated trailing edges of the turbines are shown in the photographs in Appendix E. The serrations are each only 30cm tall (approximate) over a length of only 10m (approximate). Therefore, given their very small scale, are not visible on elevation plans of turbines.

## 7 Noise Audit

*There is a statement in the concluding remarks in the Noise Audit that "The sound power characteristics of the turbines can be managed by operational controls to produce lower noise outputs if required." Can you confirm that this is just a design feature that will not need to be relied upon to achieve noise levels at nearby dwellings compliant with the New Zealand Standard?*

**Response:** Infotech Research Letter is attached in Appendix F. It states:

*"In response to this question I can reply that the predictive noise assessment for the proposed Wimmera Plains Wind Farm undertaken by Marshall Day Acoustics does predict compliance with the noise limits given in the New Zealand Standard NZS 6808:2010 of 40 dB LA90(10 min) or background plus 5 dB whichever is greater.*

*I can say that this option of using operational controls to meet noise levels is unlikely to be required if the plans are true and the sound power output of the turbines chosen is a maximum 104 dB(LWA). I understand that the prediction of noise levels used in the Marshall Day Acoustics report was conservative in its assumptions that included adding 1 dB to the sound power output of the turbines.*

*The conclusion in the audit report simply provides reassurance to the reader that further wind farm noise controls are possible."*

## 8 Landscape/Visual impact assessment

*The viewpoints selected for the photomontages do not match the locations of the dwellings closest to and most surrounded by the proposed wind turbines (dwellings 5, 6 and 19). Therefore, it's difficult for us to assess the visual impact to these dwellings. Can additional photomontages be prepared for these locations?*

**Response:**

Additional photomontages for these locations will be prepared and submitted to the RA in the near future. We submit that the application can be put out for public comment without these additional montages as the below views are generally representative of other photomontages already provided.

Notwithstanding, the views from these receptors are described on the Landscape and Visual Impact Assessment (LVIA) prepared by Green Design on Table 14 - Dwelling visual effect matrix (pages 55 through to 81). The exception is receptor 6 because, at the time of preparation of the LVIA, receptor 6 was a participant stakeholder. These descriptions are transcribed below:

*Receptor 5 – "Short distance and direct views extend from the dwelling and curtilage in a north to south east direction toward wind turbines within the project site. Views toward wind turbines within the north west to south west portions of the project site would be partially filtered and/or screened by tree planting surrounding and beyond the dwelling. Degree of existing screening at dwelling: Low to Moderate. Potential visual effect: Moderate to High."*

*Receptor 19 – "Short distance and direct views extend from the dwelling and curtilage in a northeast through to south-west direction toward wind turbines within the project site. Views are likely to be restricted to upper portions of the turbine structures (nacelle and blades) by tree cover to the east of the dwelling. Degree of existing screening at dwelling: Moderate. Potential visual effect: High."*

It is reasonable to anticipate that the visual effect at Receptor 6 will also be in the range Moderate to High.

## 9 Native Vegetation impacts

*The Native Vegetation maps provided with the Ecology Report state that the access to be created from Banyena Rd to T37 and T38 is through planted vegetation. This appears to be the case for the planted trees but what about the understorey? The report lacks any description of the planted veg, its understorey or applicability of the relevant permit exemption.*

*Some areas of Native Veg proposed to be removed coincide with areas where Native Veg has been permitted for removal under the Jung permit. How has the calculation of NVR associated with this application treated such areas? I would assume that the Jung NVR cannot discount that needed for this app, should the Jung WF permit hypothetically not be acted upon.*

*The Access Points maps show the most detailed plans of NVR provided – however not all NVR across the project site is shown. Do additional plans exist showing other NVR in more detail? The Ecology Report maps show the location of NVR but not much detail re extent or patch ID in relation to the DELWP NVR report table.*

### **Response to 1<sup>st</sup> paragraph:**

The planted vegetation within the study area, and near T37 and T38 is predominantly non-native to Victoria (i.e. Sugar Gum, Yate, Swamp Mallet), or not indigenous to the Horsham area. Although some species are native to other areas of Victoria, given that they are clearly planted and arranged in linear strips (i.e. windrows), the clearing of this vegetation is exempt from requiring a planning permit under the 'planted vegetation' exemption detailed in Clause 52.17-7 of the Horsham Rural City Planning Scheme.

The understory below the canopy of planted vegetation is dominated by exotic flora – predominantly Barley, Rye-grass, and/or Wheat. Where a patch of native vegetation was present within the road reserve, this was mapped as per the definitions detailed in the Guidelines (DELWP 2017). No native vegetation will be impacted through the creation of access to T37 or T38.

### **Response to 2<sup>nd</sup> paragraph:**

The 0.009 hectares of native vegetation approved for removal under Permit PA 1800346 has been accounted for in the 'past removals' section of the impact assessment as required under the Guidelines (DELWP 2017). The extent of past removals informs the assessment pathway of the application. The native veg removal and offset obligations approved for removal under Permit PA 1800346 have been secured by Baywa. re (credit extract provided in Appendix G), and no further action is required relating to this under the current application.

### **Response to 3<sup>rd</sup> paragraph:**

The cadastral maps are not accurate. The layout plans show the proposed access track alignment and the actual location of native vegetation as opposed to the cadastral layer. Using the cadastral boundaries, the project would result in the removal of 0.2521 ha of native vegetation. In Appendix H an example map illustrating this is presented. Based on the actual "on the ground location" of the native vegetation recorded by Ecology and Heritage Partners as part of the Ecological Assessment and the alignment of the existing road which will be upgraded and used as a new access track, it is most likely that this vegetation will be predominantly retained. To err on the side of caution however, we have calculated the native vegetation losses and offsets on the higher calculation of mapped losses as opposed to actual.

If you have any further queries regarding this information, please contact me.

Regards,



Fi Cotter,  
Energy Forms