

24 August 2020

Mitchell Connelly  
Planner  
Renewables Team  
DELWP  
Delivery via email:

Dear Mitchell,

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

We refer to your request for further information and now provide the following to address that request. We note that to satisfy the request the following items have been amended:

Volume 1 – Reference to the number of turbines reduced from 54 to 52 in the report.

Volume 2 – Planning report prepared by Energy Forms updated to reflect the reduction in turbines from 54 to 52 turbines.

– An updated Shadow Flicker Report to respond to this request.

Volume 3 - Updated plans to show the reduction in turbines from 54 to 52.

Additional Plans showing the locations of the proposed accessways.

**1. Confirmation of the proposed Megawatts (MW) that the development will produce.**

The proposal was originally for approx. 302MW (54 turbines with 5.6MW nominal capacity) as stated in the Executive Summary and page 2 of the Planning report prepared by Energy Forms submitted with the original application. However, with the removal of turbines 45 and 46 (see item 10 below for more information) the proposal is now for approx. 291MW. We have updated the cover and planning report to reflect these changes (in the accompanying Volume 2). As the change is a reduction in footprint and impact, the other consultant reports lodged with the application will continue to be relied upon.

**2. Confirmation of the area of the development footprint. The application states that the 'subject land' is 3,800ha however the application does not detail the area of the actual development footprint albeit does indicate that the development footprint is much smaller than the total land area of 3,800ha.**

The proposed land area to be developed is 52.72 ha as shown in Table 1 Land Parcels on Page 7 of the planning report prepared by Energy Forms submitted with the application and now in the updated version (Volume 2). This is the approximate development footprint area and will reduce slightly as a result of the reduction in the two turbines.

**This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright**

3. Provide details on the parcel/land description details of the two crown land parcels and any road reserves that are included within the application. It is noted that ownership and land identification details have been provided for the 42 privately owned parcels however these details have not been provided for crown land and road reserves.

The Crown Land and public land parcels are included in Table 1 Land Parcels on Page 7 of the planning report prepared by Energy Forms and submitted with the original application (Volume 2). It remains unchanged in the amended Volume 2.

4. A plan which overlays the development over the mapped overlay areas (LSIO and BMO) and areas of cultural heritage sensitivity. It is acknowledged that the application states that the development is outside the overlays and areas of cultural sensitivity however these areas do appear to be within the development footprint and the extent to which this occurs (if at all) needs to be ascertained.

There are areas of cultural sensitivity and LSIO within the Project Envelope. The project footprint does encroach in the areas affected by the LSIO as shown in Figure 3 of the project report (Vol 1) prepared by BayWa r.e which was submitted with the application. The works in the LSIO area are minor works for cabling.

The project footprint encroaches on a small area of land which is of potential cultural sensitivity located along Finlaysons Road (as shown on Site Map 9). The area will be used for a cable trench in the road reserve. A voluntary CHMP has been prepared for this project. Advice has been sought our heritage adviser and is summarized as follows:

**Summary of Advice:**

- The project layout has been amended subsequent to the Complex Assessment.
- The Finlaysons Road area of cultural heritage sensitivity will be impacted by cable trenching.
- This area of sensitivity is highly likely to have been subject to significant ground disturbance, which if established as fact, means it is no longer an area of cultural heritage sensitivity.
- Additional testing under the existing voluntary CHMP will establish whether or not significant ground disturbance has occurred.
- There is no consideration of a mandatory CHMP requirement once significant ground disturbance is established.
- Additional testing should also include layout amendments subsequent to the last stage of the Complex Assessment.

A copy of the letter from Green Heritage accompanies this letter.

5. Provide further details on the current and ongoing agricultural use of the land. It is acknowledged that the site is made up of 44 parcels which are currently used for agricultural purposes and that the wind farm will occupy a large portion of the total site. It is unclear what agricultural uses will continue outside the development footprint and whether any agricultural use will occur in conjunction with the wind farm use within the development area.

The relevant sections of the Planning Report are extracted and expanded on below in response to Point 5 of the Request for Further Information letter.

**Section 1.1.2**

- The existing use of the site is predominantly agriculture in the form of broad acre cropping.

**Section 6.1**

- The broader community will benefit from a new stabilising factor in the agricultural economy.

**Section 6.2**

- Cropping/grazing uses can easily continue around the turbines through the life of the facility.
- The facility provides a stable source of income for agricultural landholders through leasing small parts of their land to host turbines. This can assist with fluctuations in commodity prices, crop yields, and assist with investing in agriculture by using the stable income for purchasing agricultural business investments.
- The effect of the facility on sustainable agricultural potential of the land is negligible, with the small amount of land being utilised able to be reinstated after the life of the facility without significant impacts on future uses.

- *The operation of the wind energy facility will not limit the agricultural capabilities of adjoining land or land in the wider vicinity.*

### **Current agricultural use of the land**

As outlined above, the current agricultural use of the subject site is predominantly broad acre cropping, which is an as of right use under the Horsham Planning Scheme.

### **Ongoing agricultural use**

The wind farm will occupy a small portion of the total site area. As detailed in Table 1 of the planning report, a total works area of 52.72ha applies over a site area of 3801.74ha, which proportionally is a development footprint of approximately 1.38%.

It is envisioned that agricultural use of the subject land will continue as broadacre cropping into the foreseeable future, with income from hosting turbines supplementing agricultural activities, creating a more resilient agricultural enterprise. Cropping will likely continue around the foundations of the turbines and in any areas generally not affected by the development footprint of turbines and other site infrastructure.

Agricultural uses adjoining the subject site will not be affected by the proposal and will likely continue as broadacre cropping.

There are many examples of ongoing agricultural use of broadacre cropping around wind turbines around Victoria.

It should be noted that the continuance of agricultural activities is an informal understanding between the proponent and the host landholders. Wind farm infrastructure will be used and operated by the proponent under a leasing arrangement with the landholders. The ongoing agricultural use of all other subject land outside of the development footprint will remain under the discretion of the landholder and not the proponent, therefore it would be inappropriate to make a commitment on the ongoing use of this land.

It should also be noted that the agricultural use of the subject land is potentially a secondary concern to the health of the region's agricultural economy. For example, where an alternate use of the subject site would improve the resilience and productivity of the region's agricultural economy as whole, it may be preferable to use the subject site for this alternate use over agriculture itself.

Given the contribution of the wind farm to renewable energy generation, climate change mitigation (and therefore mitigation of impacts on agriculture from climate change) and regional economic diversification, and the low agricultural productivity of the land, the ongoing use of cropping on the subject site around the development footprint is not a significant concern.

### **6. Clarification that the proposed 54 turbines are in addition to the two turbines that have previously been approved as part of planning permit PA1800346 (Jung wind farm).**

We confirm that this proposal was originally for 54 turbines and in addition to the approved 2 turbines of the Jung Wind Farm. However, in accordance with item no. 10 below a decision has been made to remove turbines 45 and 46 (see item 10's response for more info). For the avoidance of any doubt, this proposal is for 52 turbines and this is in addition to the 2 turbines already approved for the Jung Wind Farm.

### **7. A plan showing the aviation safety detail for the proposed met masts.**

A plan is included in the updated Volume 3 plans (last page). It shows detail of where marker balls will be installed on the guy wires and which sections will be painted in red and white.

### **8. A plan which indicates the access points to the wind farm development and details on whether these access points are existing or new, if widening or other modifications are required and any impacts that these access points will have on native vegetation. It is noted that the application documents list three main access points and seeks approval under the provisions of the Road Zone Category 1 however no other detail has been provided.**

**If additional roadside native vegetation is impacted as a result of new or modified access points then the application will need to be amended to address the loss of additional native vegetation.**

Updated plans have been prepared and are included in the PDF plans "20200720 WIM accessway locations.pdf".

The development infrastructure will be distributed around the project area through multiple access points:

Main Access point from/to Henty Highway (RDZ1):

- The development of the facility will require to utilize Henty Highway as a delivery route for large turbine components. The components will be distributed into the network of local roads via three main access points which are intersections of local roads with Henty Highway within the project area. These are:
  - o Henty Highway / Shearwoods Road
  - o Henty Highway / Banyena Road
  - o Henty Highway / Ladlows Road
- All three main access points are already existing and may require a temporary signage removal and only minor gravelling as per swept path analysis described in the Traffic Impact Assessment report included in Volume 2.
- These are labelled A, B, C in the Access Points Overview Map attached and each access point is shown in a closer detail on a individual map.
- Only one main access point, Henty Highway / Banyena Rd, will have an impact on native vegetation.

Secondary Access point from/to local roads:

- There are 42 proposed newly created access points from local roads into private parcels which will require widening to deliver large turbine components.
- Furthermore, 8 existing access points from one local road to another (e.g. an intersection of Finlaysons Rd and Dogwood Rd) will be utilized and will require road widening to fit large turbine components as a part of the proposed upgrade of local roads.
- Secondary access points are numbered 1 - 50 in the Access Points Overview Map. Only two of these access points (#28, #42) will impact native vegetation and detailed maps of them are provided.

The proponent notes that the total area of impacted native vegetation is assumed to be significantly lower than what is calculated in the Ecological Assessment Report and no trees will need to be removed. The calculated impact of the development on native vegetation is determined by spatial intersection of two datasets each from a different source:

- Vegetation data collected in the field during EHP site surveys;
- Development Footprint based on official cadastral boundaries.

Cadastral boundaries particularly in rural areas are not spatially accurate often being “shifted” by several meters from their correct location. EHP collected their vegetation data in the field with GPS tracking devices which tend to show much better positional accuracy. Therefore, given the mutual geospatial inconsistency of the two datasets, overlaying them may result in undesirable intersections and excess of calculated vegetation impact.

**9. An updated shadow flicker report which includes an executive summary, maps, a conclusion and any recommendations to improve its accessibility for decision makers and the public.**

An updated shadow flicker report is included in the updated Volume 2.

**10. Clarification about the impact of the Mining Licence on the application. The application documents indicate that part of the development area is encumbered by an existing mining licence/s (shown in pink on the existing conditions plan). Please provide additional information on the mining licence/s and how this impacts on the proposed wind farm development.**

Turbines 45 and 46 and related infrastructure (access tracks, cable trenches and hard stands) have been removed from the layout to avoid the quarry licence with reference WA518 (northern-most). There is now no infrastructure on the land affected by the licence.

The configuration of the cable trench connecting turbine 54 has been changed to completely avoid quarry licence WA29 (middle).

A plan showing quarry licence areas, reference numbers and wind farm layout is included in updated plans package in Volume 3.

As the change to the project and plans is a reduction in the number of turbines and development footprint, it results in a lesser impact and therefore the other expert consultant reports can continue to be relied upon.

**11. Clarification of landowner, and their consent to use Crown Land: It is noted that two crown land parcels are included within the site. The use of these parcels is likely to require landowner consent from DELWP (on behalf of the Crown) which is done under delegation from the Grampians Region. We would recommend that you contact the Grampians Region (ph: 5336 6856) to discuss this component of the project.**

An email has been sent to the Grampians Region at [publicland.ballarat@delwp.vic.gov.au](mailto:publicland.ballarat@delwp.vic.gov.au) on the 1<sup>st</sup> July 2020 and a further email on the 28<sup>th</sup> July 2020 as per their current process. No reply has been received to date however consent will be sought to use the referred Crown Land parcels.

If you have any queries in relation to this information please contact me on 0408 587 095 or [fi.cotter@energyforms.com.au](mailto:fi.cotter@energyforms.com.au)

Sincerely,



Fi Cotter,

Energy Forms