

Ref: 531455 & 531457

22 June 2018

Hon. Richard Wynne Minister for Planning Department of Land, Environment, Water and Planning

Via email: stateplanning.services@delwp.vic.gov.au

Att: Michael Juttner, Manager Wind Farms

Dear Michael,

Moyne Shire Council submission – Planning Permit Application No. PA1800360 Removal of native vegetation associated with Minor Utility Installation for Ryan Corner and Hawkesdale Wind Energy Facilities

Council makes the following objection regarding the above planning permit application.

Regarding the proposed native vegetation removal associated with the Transmission Line (TxL), Council makes the following comments:

- Review of the Flora and Fauna Assessment (BL&A, May 2018) suggests that the vegetation surveys were conducted in late March/early April 2018. Council considers that this is not the most ideal time to survey and identify native grassland species, and suggests that the applicant be required to conduct a further survey and assessment during Spring.
- Council is concerned that the application understates the potential impacts to native vegetation by adopting a small construction footprint for each TxL pole of 3.14m². Based on recent experience for TxL construction, this area may be much greater considering road reserve constraints, the size of the poles proposed and their infrastructure lay down area, heavy vehicle movements and construction works.
- The 'Avoid and Minimise Statement' at Section 7.2.1 of the Flora and Fauna Assessment suggests that prior assessment has resulted in amendment to the TxL alignment, yet nowhere has information been provided which identifies key locations that have been avoided. The applicant may be requested to provide additional information on these matters to substantiate the claim.





Whilst the TxL infrastructure itself is regarded as a minor utility installation, and not part of this permit application, Council wishes to use this process to raise the following comments for consideration by the applicant, Ryan Corner Development Pty Ltd:

- Council's local road reserves do not always have sufficient capacity to accommodate new TxL infrastructure.
- The development plans submitted provide no indication of pole heights and diameters, pole numbering or reference to property and road reserve boundaries. Even at magnification, it is difficult to determine the exact pole locations.
- Figure 4 shows a pole located in, or just outside of McGillvrays Road road reserve.
- Figure 5 shows three (3) poles located in the Willatook-Warrong Road road reserve. There are also concerns regarding the alignment at the Poyntons Road intersection and the poles proposed in the road reserve. Council does not support poles in these road reserves.
- Figure 6 shows a pole located in the Coomete Road road reserve.
- Figure 8 shows a pole located in Tarrone North Road road reserve near the Tarrone Terminal Station intersection. This pole should be relocated away from the road reserve.
- Figure 9 indicates that the TxL runs near or within an unmade road reserve.
- Figure 10 shows a pole which appears to be located on the curve of the Tarrone North Road road reserve. Council suggests relocation or realignment to avoid the need for a pole in the road reserve at this location.
- Figure 12 shows a pole in the Tarrone Lane road reserve.
- Figure 16 shows a pole located in the Spencers Road road reserve. VicRoads should be consulted with regarding this pole location.
- Numerous TxL poles appear to be sited in the vicinity or within wetland areas and waterways. Council queries what consultation has been undertaken with the Glenelg Hopkins Catchment Management Authority for these locations.





Regarding the above TxL design comments, and following submission of this objection to DELWP, Council will contact the developer to arrange a meeting to discuss the capacity of the relevant local road reserves to accommodate new TxL infrastructure.

Should you have any questions regarding this matter, please contact Aaron Moyne, Strategic Planner / Energy and Major Projects Officer, on 5568 0580 or by email at aaronm@moyne.vic.gov.au

Kind regards,

Oliver Moles **Director Sustainable Development**

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