

Appl. Ref.:PA2101109

3<sup>rd</sup> November 2021

██████████  
Planner, Development Approvals and Design  
Statutory Planning Services, Planning  
Department of Environment, Land, Water and Planning

Dear ██████████

Re: APPLICATION FOR PLANNING PERMIT PA2101109, WOMBELANO WIND FARM  
REQUEST FOR FURTHER INFORMATION

Dear ██████████

In response to your correspondence dated 22<sup>nd</sup> October 2021, and as discussed by email and via telephone conversation, please find attached our updated application, submitted under Section 50 of the Act.

We trust that this submission will allow you to properly assess our application.

By way of summary, we have updated and clarified the following:

Item 1: We have refined our application to focus on the Vestas V162 wind turbine, limiting our application to that specific wind turbine. This means that:

- The Planning Report has been updated to reflect the single wind turbine proposed and a swept path analysis has been completed by our civil engineer on the curve in the track along the southern site boundary;
- Appendix 1: Photomontages – have been reduced to just one set of photomontages, showing a 170 m rotor diameter, providing a conservative model of the visual impact. We have updated the background document to reflect this change.
- Appendix 2: No change to the Ecological Impact Report.
- Appendix 3: Acoustic impact – the original report specifically modelled the 6 MW V162 wind turbine. Thus, this is unchanged.
- Appendix 4: Traffic Report – the original report allowed for the transport of blades from a 170 m rotor; we have not updated this aspect of the report as it provides conservatism.
- Appendix 5: EMI – this was based on a 250 m hub height, thus no update is required.
- Appendix 6: Aviation – this was based on a 250 m hub height, thus no update is required.
- Appendix 7: Booklet of Maps – we have updated the wind turbine elevation to show the dimensions of the Vestas V162 wind turbine.
- Appendix 8: Economic Impact Assessment – no change.
- Appendix 9: Geotechnical Survey – no change.
- Appendix 10: Proposed permit conditions – updated to reflect the reduced rotor diameter.
- Appendix 11: Land titles – no change.
- Appendix 12: Anemometry – no change.
- Appendix 13: Indicative Construction Drawings – no change.

Item 2a: A reference to all permit triggers:

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We understand that there was some concern about the need for Business Identification Signage – however, unlit signs less than 3 m<sup>2</sup> are proposed as part of the development, thus not requiring a permit trigger. The location of the signage was shown in Figure 32, Figure 33 and Figure 45. This has been removed.

Item 2b: Attachment of list of lots and roads reserves attached to the application form:

This list has been extracted into a separate document: “Land Impacted by Proposal.pdf”. We do not appear to be able to edit the application form in the portal to reference this. Please advise on how you wish us to proceed.

Item 3: Inconsistency of the proposed primary access point:

We have updated the maps showing the access only from the south in Figure 32 and 45. We have also resubmitted Cardno’s Traffic Study to include updated swept path analysis for entrance from the south. An explanatory note has been added to the Planning Report stating:

*Vegetation removal assessment has been completed based on approach of over-length vehicles from the south and this approach is shown in Figure 32 and Figure 45.*

We also note explicitly in the Planning Report, that existing site access points will not require additional works beyond general maintenance, and that these access points are important for emergency vehicle access.

Further, we have provided an additional figure showing the overlay of the proposed vegetation removal with Cardno’s swept path analysis, which demonstrates ample space for the over-length loads to pass.

Item 4: Updated Biodiversity Study

We understand DELWP’s concern that the Proponent has mapped TPZs at the new site entrance, whilst in the expert consultant report no TPZs were mapped. In correspondence dated 25<sup>th</sup> October 2021, Subject: FW: WWF between the Proponent and DELWP (Mr Neville), we forwarded you remarks from EHP’s Natural Heritage Team Leader Jeremy Coyne stating:

*The site entrance to the south does not have any large or scattered trees, so therefore there is no need to show any TPZs.*

We note your concern about trees 43 and 96. We have added specific mapping and analysis to the Planning Report to address these concerns. The outcome of the mapping and analysis are summarised as follows:

- The 11.1 m wide construction track impacts approximately 6% of the TPZ of Tree 96 (DBH: 0.56 m; Type: *Allocasuarina luehmannii*, 1.5 m encroachment), resulting in 0.6 m buffer from “being impacted” (i.e. 10% impact).
- The 11.1 m wide construction track misses the TPZ of Tree 43 (DBH: 0.52 m; Type: *Allocasuarina luehmannii*) by 0.12 m.

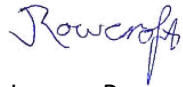
In response to your note regarding blade drop risk, we have provided a brief analysis of the risk associated with blade throw as a new appendix: Appendix 14. This analysis assessed the likelihood of blade drop and blade fragmentation, based on Australian wind turbines. I continue to take issue with the implication that the life of a person who is on the subject site is somehow of less value than someone who is not on the subject site. As such, our analysis attempts to provide a conservative

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characterisation of the overall likelihood of a blade throw incident impacting human life. We estimate that the return period for such an incident is 8 million years per wind turbine. As such, the residual risk is considered to be broadly acceptable.

Further, it is noted that due to the addition of figures to the body of the report, the figure numbers have been updated and may not match previously submitted versions.

Kind regards,



Jerome Rowcroft on Behalf of the Wombelano Wind Farm Development Team  
Secretary, Wind Projects Australia Project 1 Pty Ltd  
Director, Wind Projects Australia Pty Ltd

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