Willatook Wind Farm

Date: 11 May 2026

To:
Department of Transport and Planning

environment.assessment@transport.vic.gov.au
development.assessment@transport.vic.gov.au

Department of Energy, Environment and Climate Action
pea.energyproject@deeca.vic.gov.au

Request to Apply the Handbook for the Development of Renewable Energy in Victoria

Dear Department Representatives,

I write in relation to the Willatook Wind Farm, located near Orford, Victoria, for which we are currently preparing material to support an amendment to Planning Application No. PA2201620 for the use and development of land for the purposes of a 'wind energy facility' under the *Planning and Environment Act 1987*.

The Project has progressed through a comprehensive environmental assessment under the *Environment Effects Act 1978* (Vic), with the associated Environment Effects Statement (EES). Following public exhibition (in July-August 2022) and an Independent Panel Hearing/Inquiry (in Oct-Nov 2022), Minister for Planning issued her Assessment of the EES (in July 2023). After reviewing the EES, stakeholder submissions, and the independent panel's findings, the Minister for Planning (Vic) recommended that the project could proceed, provided the design was modified to reduce potential impacts on the Brolga and Southern Bent-wing Bat.

I also note the project is a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999*, (referral 2019/8439). The Project therefore also requires assessment by the Commonwealth Minister for Environment (or delegate).

Following the Minister's Assessment, a suite of additional technical work has been undertaken to ensure full alignment with the Handbook and to respond to the specific matters identified by the Minister. These assessments apply the updated risk-based framework, mitigation hierarchy and species-specific requirements set out in the Handbook and respond directly to the Minister's recommendations.

This includes:

- A revised Brolga Impact Assessment (Nature Advisory, 2026a) prepared in accordance with the species-specific guidance in Appendix 2 of the Handbook, incorporating updated wetland characterisation, hydrological assessment, breeding habitat identification and refined buffer application.
- A revised Bat Impact Assessment (Nature Advisory, 2026b), including a detailed assessment of Southern Bent-wing Bat and other species of concern, incorporating updated analysis of long-term acoustic monitoring data, at-height activity and application of the Handbook's bat-specific guidance in Appendix 3.

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WIND PROSPECT

Willatook Wind Farm

- An Addendum Biodiversity Assessment (Nature Advisory, 2026c) to reflect the modified project design and confirm the implications of layout refinement and infrastructure changes.

The additional work undertaken post-Minister's Assessment has been deliberately targeted to address the matters identified as requiring further consideration, namely Brolga and threatened bats, with a particular focus on the Southern Bent-wing Bat.

In line with the transitional arrangements at section 4.6 of the Handbook, we request your agreement that we apply the Handbook to support a clear, coordinated application and assessment process that aligns with current government policy.

The Project applies the Handbook to guide our preparation of amended planning permit applications, including measures to avoid, minimise, mitigate and compensate for potential impacts on the Victorian Brolga and threatened bat species.

For all other threatened bird species, the existing EES technical work has been used as the primary evidence base. This information has been retrospectively assessed against the criteria and expectations of the Handbook, consistent with its risk-based and proportionate approach. This ensures that the level of further assessment is commensurate with the level of risk identified.

The application of the Handbook has been summarised in the document *Application of the Victorian Renewable Energy Handbook and Response to the Minister's Assessment* (Wind Prospect, 2026). This document also outlines how the project aligns with and responds to the relevant findings and recommendations of the Minister for Planning's Assessment under the *Environment Effects Act 1978*.

The attached table summarises our intended response to Table 6 of the Handbook. This framework will guide the structure and content of our application documentation.

We would welcome the opportunity to discuss this further. Please contact me via email (Michael.sale@windprospect.com.au) or phone (0401 915 034) with any queries.

Yours sincerely,

Michael Sale
Regional Development Manager
Wind Prospect

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WIND PROSPECT

Attachment – Outline of intended response to Table 6 of the Handbook - Matters to address when demonstrating application of the mitigation

Matter to be addressed	Description
Description of project risks and impacts	Brolga and Southern Bent-wing Bat were identified through the EES and the Minister's Assessment as the key species of concern. These findings have been further informed by detailed technical assessments prepared by Nature Advisory, including the Brolga Impact Assessment (Nature Advisory, 2026a), Bat Impact Assessment (Nature Advisory, 2026b) and Biodiversity Assessment (Nature Advisory, 2026c). Brolga have been recorded at a number of locations within and surrounding the Project area, and Southern Bent-wing Bat has also been recorded, albeit at low levels of activity. The primary risk to these species is potential interaction with turbines, with a secondary risk of disturbance associated with infrastructure located within or near habitat features such as breeding wetlands and higher-value foraging corridors. The Cockatoo Swamp wetland complex (for Brolga) and the Shaw River corridor (for bats) were identified as key habitat features and have been the focus of avoidance and design refinement. As a result, potential impacts are expected to be limited and predominantly indirect and localised, with limited potential for direct collision risk. Other threatened bird and bat species have also been assessed, but are considered to be of lower risk based on their ecology, recorded activity and limited interaction with the Project.
Description of measures for avoidance, minimisation and mitigation	The Project has applied the mitigation hierarchy in accordance with the Handbook, with a primary focus on avoidance through strategic siting and the application of turbine-free buffers around key habitat features, including Brolga breeding wetlands within the Cockatoo Swamp complex and higher-value bat habitat associated with the Shaw River corridor. These measures have been informed by detailed, species-specific assessments and represent the most effective means of reducing risk Where complete avoidance was not practicable, impacts have been minimised through iterative design refinement and micro-siting, as well as design measures such as increasing the minimum blade tip height to reduce overlap with the typical flight height of bat species. Residual risks have been mitigated through operational controls, including low wind speed curtailment and blade feathering, consistent with the Minister's Assessment and Handbook guidance. The effectiveness of these measures is supported by extensive site-based survey data, species-specific behavioural information and demonstrated outcomes from comparable wind farm developments, and will be further supported through monitoring and adaptive management (see *Application of the Victorian Renewable Energy Handbook and*

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WIND PROSPECT

Matter to be addressed	Description
	Response to the Minister's Assessment; Wind Prospect, 2026 for a detailed description)
Description of residual impacts	Residual impacts and risks to threatened bird and bat species are expected to be low following application of the mitigation hierarchy. For the species of greatest concern, namely Brolga and Southern Bent-wing Bat, residual impacts are limited and clearly characterised. For Brolga, residual impacts relate to a localised section of underground cable and access track within a Breeding Wetland Buffer, which will be constructed outside the breeding season and subject to monitoring, and the presence of a turbine within a disturbance buffer for a Potential Breeding Wetland (12a), which is addressed through compensatory measures in accordance with the Handbook. For Southern Bent-wing Bat, residual impacts are associated with a low, but a residual risk of collision with turbines remains. This risk is managed through operational mitigation measures and an adaptive management framework, including the capacity to increase cut-in speeds and implement additional controls in response to any recorded mortalities. While some uncertainty remains inherent in predicting wildlife interactions, these residual impacts are considered capable of being appropriately managed, with limited uncertainty that they would not be able to be addressed through the mitigation hierarchy.
Description of compensatory measures	Compensatory measures are proposed for Brolga in response to the residual impact associated with a turbine located within a disturbance buffer for a Potential Breeding Wetland (12a), in accordance with the requirements of the Handbook. The proposed approach focuses on improving breeding habitat function through the enhancement and management of wetlands and surrounding habitat, including hydrological restoration, vegetation management and long-term protection of suitable breeding areas to deliver a landscape-scale benefit consistent with the intent of the Handbook. The compensation strategy has been developed with input from species experts, including Nature Advisory and Odonata, and informed by engagement with DEECA and local stakeholders, including Landcare groups. It draws on established approaches applied at other wind farm developments in south-west Victoria. Based on this evidence base and the targeted nature of the proposed measures, the compensation is considered likely to be effective in addressing the residual impact.
Description of implementation of measures	Measures under the mitigation hierarchy will be delivered by the Project owner/operator through the Environmental Management Framework, including the Bat and Avifauna Management Plan (BAMP), Brolga Compensation Plan, Construction Environmental Management Plan (CEMP) and other relevant management plans, secured through planning permit conditions. These plans establish clear implementation pathways, monitoring and reporting requirements, and adaptive

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	management triggers, with financial provision made by the Project to ensure delivery of mitigation and compensatory measures over the life of the Project. Nature Advisory will provide key ecological expertise to support implementation, monitoring and adaptive management. Compensatory measures for Brolga will be implemented with input from suitably qualified third parties, including Odonata for specialist advice on compensation design, with roles and responsibilities to be formalised through agreements. These arrangements will be supported by clear governance, monitoring and review processes to manage uncertainty and ensure outcomes are achieved, including the ability to refine measures over time and provide for independent audit or review where required.
Monitoring, reporting, evaluation and adaptive management	Monitoring, reporting and adaptive management will be implemented through the Environmental Management Framework, including the Bat and Avifauna Management Plan (BAMP) and Brolga Compensation Plan, which establish post-construction monitoring programs, reporting requirements and defined trigger thresholds for management response. This includes monitoring of bird and bat activity and mortality, evaluation of mitigation effectiveness and regular reporting to relevant authorities. Adaptive management will be applied through defined response pathways, including refinement of operational controls (such as increased cut-in speeds) and adjustment of compensatory measures where required. Implementation milestones and ongoing performance will be tracked through monitoring outcomes, compliance reporting and periodic review over the life of the Project.

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