

24th March 2026

Minister for Planning,
C/ Department of Transport and Planning,
GPO Box 2392,
Melbourne VIC 3001

Dear Minister

Planning Permit Application PA2503812 – Watta Wella Wind Farm

The Northern Grampians Shire Council (NGSC) appreciates the opportunity to make a submission on the Watta Wella Wind Farm planning permit application currently being considered by the Minister.

NGSC is strongly invested in ensuring renewable energy developments carefully consider and address the significant community and local impacts caused by such projects.

NGSC have reviewed the application documents and have a number of concerns which require resolution prior to the issue of any Planning Permit.

A number of permit conditions are also required (contained in Appendix 1) and are requested to be imposed on any permit to issue.

A full copy of NGSC's specific concerns are contained in the attached comment register (Appendix 2). A summary of NGSC's primary concerns are outlined below:

Cumulative Impacts

The Watta Wella Permit application fails to consider the cumulative impacts of the multiple large-scale renewable energy and transmission projects proposed in the region, including the Joel Joel Battery Energy Storage System (BESS) project, VNI-West and the WRL project. These projects are immediately adjacent to the Watta Wella Wind Farm and have overlapping construction timeframes, resulting in cumulative impacts, which include:

- the impacts of construction noise, traffic and dust on nearby residents,
- the impacts of traffic on the safety and road access of local road users, including on the condition and serviceability of local roads.
- The impacts of the significant construction workforce on local services and infrastructure.

A significant number of the technical reports fail to consider the cumulative impact should all these projects be under construction simultaneously, which is the probable scenario given the projected timeframes for the various projects.

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Worker Housing

The permit application states that the project will have up to 380 workers during construction; however the application does not propose to provide any dedicated worker housing. Rather, the application asserts that the proponent will prepare an Accommodation and Employment Strategy. An Accommodation and Employment Strategy (which has not yet been developed) is not considered sufficient to address the current lack of housing in the surrounding area, and it remains unclear where the large workforce will be accommodated in a manner which will not significantly adversely impact on the local populations of nearby communities. Provision of additional housing must be made a requirement of any permit and should be required to be delivered prior to commencement of construction works.

For context, the Northern Grampians Shire Council and surrounding local government areas have an extremely low rental vacancy rate and very low unemployment. If workers are to move to the region to work on the project, they will add to competition for housing. If workers in the region change jobs to work on the project, their employers will be challenged to recruit replacement workers due to the lack of housing in the area.

The housing issues will be further exacerbated given the project development will coincide (at least in part) with the Joel Joel BESS, Western Renewables Link and VNI-West. The permit application does not identify or address any cumulative impacts on housing of the four projects.

Furthermore, the Social Impact assessment indicates that the 'Future Growth Area Master Plan (NG SHIRE 2024) *"presents a significant opportunity for wind farm developers to collaborate with council to house their workforce"*. The Stawell Future Growth Area Master Plan is in its embryonic stages and will require future rezoning. Given the timeframes proposed for delivery of the Watta Wella windfarm, this potential future growth area cannot be relied on to accommodate any of the proposed workforce.

To mitigate the negative impact on housing availability, the project must implement a worker accommodation camp during construction – this must be imposed as a condition of any given approval. NGSC would also like to seek investment from the project into permanent housing in the Shire that will be available for other workers once the project is complete.

Impact on Road Network

The permit application states that the construction transport route will include several local roads within the Northern Grampians Shire, including Joel Joel Road, Joel South Road, and Landsborough Road.

NGSC expects that these roads will also be used by the other energy projects in the Shire at the same time. NGSC has previously experienced costly damage to its roads during the construction of multiple energy projects that it has not recovered from project developers, as all project developers denied responsibility for damage.

The proposed development will generate a substantial increase in heavy vehicle traffic along these roads identified in the Construction Transport Route over an extended construction period. The TIA identifies an increase in pavement loading by over 500% in some locations for a period of 27 months which carries a high likelihood of failure of the pavement. There's a very high likelihood of the pavement failing with a significant reduction in level of service for the community.

Specific concerns include:

- Road deterioration: Increased traffic is likely to cause potholes, rutting, edge drop-offs, and accelerated wear, which could require frequent maintenance and lead to higher costs for the local community.

- Structural impacts: Bridges, culverts, and other road structures along the transport route may experience stress or damage, particularly if traffic volumes exceed current design capacities.
- Safety risks: Increased heavy vehicle movements pose risks to other road users, including residents, agricultural vehicles, and pedestrians.
- Cumulative impacts: The region is subject to multiple concurrent infrastructure projects, which will compound road usage and accelerate deterioration.
- Maintenance and monitoring obligations: The current planning documents lack a clear, enforceable framework for road inspections, repair responsibilities, or financial assurances to ensure that the permit holder mitigates impacts promptly.

To adequately address these risks, the permit must include conditions including bank guarantees or financial security to cover potential road and structure damage, pre- and post-construction road condition surveys, ongoing inspection and rectification programs for affected roads and structures, and coordination with Council regarding the timing, scale, and route of construction traffic.

The NGSC also expects the proposal to coordinate with the other project developers in the Shire to demonstrate how they will manage their collective impacts on the Shire's roads, reduce cumulative impacts, and ensure that any road damage can be accurately attributed. Without these measures, the development poses a significant risk to road infrastructure, community safety, and Council resources.

Concrete Batching Plants

The Planning Report refers to the establishment of multiple concrete batching plants to support construction of the development. However, the report does not clearly specify the number, scale, or exact location of these batching plants. Concrete batching plants are industrial operations that can generate notable impacts including noise, dust emissions, heavy vehicle movements, lighting, and extended operating hours, particularly during large-scale construction projects.

Despite this, the Noise Impact Assessment does not appear to include any assessment of the proposed batching plants, nor does it consider the potential cumulative noise impacts associated with their operation. Given the potential for these facilities to generate amenity impacts, further information is required to properly assess their acceptability. Without this information and the necessary technical assessments, it is not possible to adequately evaluate the potential amenity impacts associated with the proposed batching plants or determine whether the proposal can appropriately protect the amenity of nearby residents and surrounding land uses.

Conclusion

The Northern Grampians Shire Council request the Minister to ensure that all of the outstanding concerns are resolved, particularly in relation to accommodation, prior to any permit being granted for the proposal. In its current form without these substantial issues being resolved, Council does not support the proposal.

Should the Minister decide to grant a permit, Northern Grampians Shire Council require the conditions contained in Appendix 1 be imposed on any approval granted:

Yours faithfully,



David George
Manager of Community Safety and Amenity

APPENDIX 1 : Proposed Conditions

1	Revised Traffic Impact Assessment (TIA) Prior to the commencement of works, the proponent shall prepare and submit a revised TIA to the satisfaction of the Northern Grampians Shire Council and the Responsible Authority that addresses the following shortfalls: a) The TIA shall incorporate the cumulative effect of other significant projects that may affect NGSC infrastructure impacted by the project, including but not limited to, VNI-West and Western Renewables Link. b) The TIA shall incorporate an assessment of the load carrying capacity of all bridges and culverts that are within the OSOM haulage route, identify any risk of damage to those structures and make suitable recommendations for mitigating that risk. c) The TIA must be updated to incorporate a strategy to mitigate the risk of damage to the pavement due to an increase in traffic loads. NGSC recognises that the TIA includes a recommendation for the proponent to enter into an agreement with NGSC to manage the risk; however, this is considered to be grossly inadequate as a mitigation strategy where the likelihood of failure and loss of level of service of some pavements is almost certain. d) Whilst the TIA has identified that Tuckers Hill quarry as the source of rock for the project, there is no guarantee that this will be the source of rock during construction. Similarly, whilst the identified haulage route from Tuckers Hill is via Stawell and Landsborough Road and is NGSC preferred route, it is noted that there is no guarantee that vehicles will use the route given that it is longer and slower than one via Salt Creek Road. The TIA will be updated to mitigate the risk of vehicles using routes other than those assumed to be used in the TIA. e) Include an assessment of roads and traffic associated with any proposed Workers Camp identified in the Workforce Accommodation Strategy. <i>Note: Northern Grampians Shire Council advises that engineering controls (which includes signage and temporary works) will unlikely be considered as acceptable other than for the construction of permanent works on the road network.</i> Once approved, these plans shall be endorsed and must not be modified except with the written consent of the Responsible Authority in consultation with Northern Grampians Shire Council.
2	Pavement Management Plan Prior to the commencement of works the proponent shall prepare and submit a Pavement Management Plan for any road within the municipality likely to be used for transport of materials or labour for the project to the satisfaction of the Northern Grampians Shire Council and the Responsible Authority The Pavement Management Plan shall describe the necessary measures to ensure that other road users are not subjected to roads in a condition less than what is currently in place or that exceeds the triggers in Northern Grampians Shire Road Management Plan, whichever is the better. The Pavement Management Plan shall document the condition of the existing road network, estimate the likely impact of the project on the condition of the road network during construction, and describe the measures necessary to ensure that the condition of the roads for the project does not, at any stage, fall to a level less than what is already in place prior to construction works or exceed the triggers in the Northern Grampians Shire Road Management Plan. The Pavement Management Plan shall: a) Document the existing remaining useful life of the pavement

	b) Describe the riding quality of all roads in IRI (International Roughness Index) for both traffic lanes c) Describe the extent and depth of edge-drop off between sealed road edge and shoulder d) Document the extent of cracking of the road surface e) Document the extent and type of any sealed wearing course defects (flushing, stripping etc) f) Measure the extent and depth of any rutting g) Demonstrate that the existing roads have sufficient strength to support the expected traffic h) Describe the measures necessary to strengthen any pavements that cannot support the expected traffic i) Include an assessment of roads and traffic associated with any proposed Workers Camp identified in the Workforce Accommodation Strategy. <i>Note: Northern Grampians Shire Council advises that engineering controls (which includes signage and temporary works) will unlikely be considered as acceptable other than for the construction of permanent works on the road network.</i> Once approved, these plans shall be endorsed and must not be modified except with the written consent of the Responsible Authority in consultation with Northern Grampians Shire Council.
3	Structure Management Plan Prior to the commencement of works the proponent shall prepare a Structure Management Plan for the project to the satisfaction of the Northern Grampians Shire Council and the Responsible Authority. The Structure Management Plan shall apply to any bridge or culvert (including both major and minor culverts) within the municipality that are likely to be used for the transport of materials or labour associated with the project. The Structure Management Plan must describe the measures necessary to ensure that any structures affected by the works are left in a condition no worse than their pre-construction condition. The Structure Management Plan shall document the existing condition of the relevant structures prior to the commencement of construction, assess the likely impacts of project-related construction traffic on those structures during the course of the works, and identify the measures required to ensure that the condition of the structures does not, at any time during construction, fall below their pre-construction condition. The Structure Management Plan shall: a) Document the condition of each structure, including crack mapping of any existing cracks (including widths) b) Document the load carrying capacity of each structure c) Describe whether the structure is capable of supporting the proposed loads d) Determine whether the structure has sufficient width for two-way traffic e) Describe the measures necessary to increase the load carrying capacity (if necessary) or widening to accommodate the increase in traffic Furthermore, should the proponent wish to use Joel South Road for the movement of OSOM vehicles, the proponent shall replace the existing, damaged bridge on Joel South Road crossing the 6 Mile Creek. The replacement bridge shall be designed in accordance with AS5100 as well as the AustRoads guides. In addition, the bridge shall: • Be designed to support SM1600 loads or the proposed OSOM loads, whichever is the greater • Accommodate two, 3.2m lanes of traffic with the appropriate offset to the bridge barrier specified in AS5100 The proponent shall obtain all necessary approvals, perform all necessary investigations and provide to NGSC drawings of the proposed works for review prior to the construction of works. The

	design shall be proof engineered and a certificate provided that demonstrates compliance with AS5100. <i>Note: Northern Grampians Shire Council advises that engineering controls (which includes signage and temporary works) will unlikely be considered as acceptable other than for the construction of permanent works on the road network.</i> Once approved, these plans shall be endorsed and must not be modified except with the written consent of the Responsible Authority in consultation with Northern Grampians Shire Council.
4	Road Safety Plan Prior to the commencement of construction, the proponent shall prepare and submit a Road Safety Plan to the satisfaction of the Northern Grampians Shire Council and the Responsible Authority. The Road Safety Plan shall apply to any road within the municipality likely to be used for the transport of materials or labour associated with the project and must identify the measures required to ensure that road safety for all road users is maintained at a standard not lower than the pre-construction condition. Using iRAP v3.10, the RSP will establish a decimal star rating for the affected roads under pre-construction conditions, assess the likely impact of the project on road safety during construction, and describe the measures necessary to ensure road safety does not, at any stage during construction, fall to a level less than what is already in place prior to construction works. The Road Safety Plan shall: - Provide an iRAP v3.10 decimal star rating of the existing road network based on pre-construction conditions - Assess the impact on the iRAP score based on the proposed construction-related traffic - Document any works required to ensure that the iRAP decimal star rating score does not fall below the pre-construction score - Complete a Road Safety Audit (RSA) on the drawings provided by the proponent for the proposed access to the development as well as for all proposed crossings of NGSC roads and amend the drawings to incorporate the recommendations of the RSA. - Undertake an RSA on each crossing and access within 12 months of the commencement of construction, or as otherwise as directed by NGSC. All recommendations shall be implemented within four (4) weeks of the RSA being completed. - Include an assessment of roads associated with any proposed Workers Camp identified in the Workforce Accommodation Strategy. <i>Note: Northern Grampians Shire Council advises that engineering controls (which includes signage and temporary works) will unlikely be considered as acceptable other than for the construction of permanent works on the road network.</i> Once approved, these plans shall be endorsed and must not be modified except with the written consent of the Responsible Authority in consultation with Northern Grampians Shire Council.
5	Traffic Management Plan Prior to the commencement of construction, the proponent shall prepare and submit a Traffic Management Plan to the satisfaction of the Northern Grampians Shire Council and the Responsible Authority. The Traffic Management Plan must identify the traffic generators, the volume of traffic being generated and the likely routes that this traffic will take. The Traffic Management Plan shall assess whether NGSC-managed roads have sufficient capacity to accommodate the increase in traffic generated by the project and the measures required to ensure that the existing Level of Service for other road users is maintained at a standard not less than the pre-construction condition. The Traffic Management Plan shall apply to any road within the municipality likely to be used for

	transport of materials or labour for the project and will document the existing Level of Service provided by the existing road network, estimate the likely impact of the project on the Level of Service during construction, and describe the measures necessary to ensure that the Level of Service of the roads affected by the project does not, at any stage, fall to a level less than what is already in place prior to construction works. The Traffic Management Plan shall: - Be prepared by a suitably qualified and experienced traffic engineer - Specify the routes, type and volumes of traffic associated with the construction, maintenance, operation or decommissioning of the works - Include the impact from other projects, including but not limited to VNI-West and Western Renewables Link - Demonstrate that the existing pavement and seal widths of the affected roads are adequate to accommodate the combined volumes of existing traffic and proposed construction traffic in accordance with AustRoads guide requirements, and, where they are not, identify the necessary upgrade works. - Include a requirement to enter into an agreement with NGSC regarding the program of inspection, maintenance, and repair of NGSC roads. The agreement shall also require the proponent to provide a bond or bank guarantee equal to 50% of the replacement cost of the affected roads, bridges, culverts, or related infrastructure, as determined by NGSC, which NGSC may draw upon if the proponent fails to meet their obligations under the agreement. - Where any works are necessary, provide drawings for review and approval by NGSC. - Include an assessment of roads and traffic associated with any proposed Workers Camp identified in the Workforce Accommodation Strategy. Further, the proponent shall provide to the satisfaction of the Northern Grampians Shire Council and the Responsible Authority drawings of the proposed site access to Landsborough Road as well as the road crossing on Potter, Vineyard and Vances Crossing Roads. The access shall be designed in accordance with the AustRoads guides but shall: - where warranted, be a BAL/BAR - shall be, at a minimum, staggered-T geometry The Traffic Management Plan shall also include a method of monitoring the road network to: - Establish a baseline traffic volume, heavy vehicle volume and composition prior to the commencement of works - Identify the increase in traffic on the approved transportation routes associated with the project traffic - Implement a monitoring system to detect any increase in traffic on the surrounding road network due to vehicles not using the assumed routes. Where traffic on any surrounding road increases by more than 2% per year from the baseline traffic volume or heavy vehicle volume during construction, that road shall be subject to the requirements of the Traffic Management Plan, Structure Management Plan, Road Safety Plan, Pavement Management Plan, and the Road Maintenance Agreement. Once approved, these plans shall be endorsed and must not be modified except with the written consent of the Responsible Authority in consultation with Northern Grampians Shire Council.
6	Road Management Act Agreement Prior to the commencement of construction, the proponent shall enter into a Road Maintenance Agreement under Section 121 of the Road Management Act 2004 to the satisfaction of the Northern

	Grampians Shire Council and the Responsible Authority. The agreement shall apply to Crowlands Road, Landsborough Road (from Crowlands to WF05), Potters Road, Vineyard Road and Vances Crossing Road and any other Northern Grampians Shire road identified as part of the Traffic Management Plan. There may be multiple agreements that exist over the affected route at any one time owing to the concurrent nature of multiple projects in the area. Any dispute or contradiction between the Agreements must be managed by the respective project owners. Nevertheless, the fact that multiple agreements may exist at the same time shall not limit Northern Grampians Shire Council's ability to draw on any bonds or bank guarantees as necessary. The agreement shall require: - The proponent to be wholly responsible for the maintenance of roads, bridges, culverts and associated infrastructure in a safe condition for the duration of the construction works - The proponent shall maintain the infrastructure in the same condition, or better, than that documented in the Pavement Management Plan or Structure Management Plan at the commencement of works for the duration of the projects construction. - The proponent to conduct a pre-construction dilapidation report for each road, bridge, culvert, or other NGSC infrastructure affected by the project's construction traffic; these reports shall form the basis for assessing any defaults under the Agreement. - The proponent to conduct a post-construction dilapidation report for each road, bridge, culvert, or other NGSC infrastructure affected by the project's construction traffic, demonstrating that the infrastructure has been returned to NGSC in a condition no worse than documented in the pre-construction report. The Agreement shall also specify: - A method to measure the roughness of unsealed roads, where applicable, in IRI on a weekly basis with a corresponding report sent to NGSC within three (3) days - Submission of a weekly road condition report to NGSC by the proponent identifying any new defects that may have occurred such as: - Potholes or shoving of any depth or size - Rutting greater than 25 mm in depth for a length of at least 20 m - Flushing or stripping of the wearing course for length of at least 20 m - Edge-drop offs exceeding 100mm in depth for a length of at least 20 m - Alligator or linear cracking of any length or size - Or any other damage attributable to the project traffic The response time for rectifying the defects as follows: - Road grading (with water cart if necessary) where the unsealed road roughness exceeds an IRI value of 7.5 m/km, within one week of exceeding the trigger level - Pothole or shoving repair - within seven (7) days of identification - Edge-drop off - within two (2) weeks of exceeding the trigger level - Rutting - within one (1) month of exceeding the trigger level - All other defects - within one (1) month of exceeding the trigger level Once approved, these plans shall be endorsed and must not be modified except with the written consent of the Responsible Authority in consultation with Northern Grampians Shire Council.
7	Road and Infrastructure Bank Guarantees Prior to the commencement of any development, the proponent must provide two unrestricted bank guarantees or bonds in favour of the Northern Grampians Shire Council for the purpose of managing and rectifying any damage to Council roads and associated infrastructure arising from the construction and operation of the development.

	The bank guarantees must be provided by the proponent (and not by any contractor) and must be in a form acceptable to the Northern Grampians Shire Council. <i>Bank Guarantee – Construction Transport Route</i> One bank guarantee must be provided to the value of 50 per cent of the replacement cost (not written-down value) of the Council roads forming part of the approved construction transport route, as nominated in the Traffic Management Plan. The bank guarantee or bond may be drawn upon by Northern Grampians Shire Council to recover the reasonable costs incurred by Council in undertaking works required to rectify damage or deterioration to Council roads arising from the development, including but not limited to: - Any defaults by the proponent where defects have not been attended to within the response times stipulated in the Agreement - Rectification of any defects caused by an increase in traffic or a change in traffic distribution on NGSC roads that are not part of the construction transport route, as determined by Northern Grampians Shire Council from traffic counters operated by the proponent or a consultant engaged by NGSC. - Any upgrades to roads deemed necessary by Northern Grampians Shire Council following complaints received from the public - The purchase of traffic counting services by Northern Grampians Shire Council from a contractor should the proponent fail to provide weekly traffic count data - Payment of outstanding amounts for the engagement of a suitably qualified engineer, selected and engaged by Northern Grampians Shire Council, to liaise with the proponent, its agents, or residents raising complaints related to the project or its impact on the community. <i>Bank Guarantee – Structures</i> A second bank guarantee or bond shall be provided for 50% of the full replacement cost (not written-down value) of any structures on the routes nominated as part of the TMP. Fifty percent (50%) of this bank guarantee shall be returned upon completion of rectification works to the satisfaction of NGSC, and the remaining fifty percent (50%) shall be returned once twelve (12) months of defect-free operation of the structures has been achieved to the satisfaction of NGSC. The bank guarantee may be drawn upon by NGSC to cover any costs incurred should any of the following occur: - Any defects identified by the post-construction dilapidation report that have not been rectified within two (2) months of submission of the post-construction dilapidation report. <i>Drawing on Bank Guarantees</i> Northern Grampians Shire Council shall notify the proponent when the bank guarantee or bond is to be drawn upon. Northern Grampians Shire Council may only draw on the bank guarantee to cover actual costs incurred. The timing and method of rectification of any defects or upgrades shall be determined entirely at Northern Grampians Shire Council's discretion.
8	Post Construction Assessment Within two weeks of the completion of the project's construction and cessation of use of the proposed construction transport route within the municipality (whichever is the latter), the proponent shall perform a post construction assessment of all roads affected by the work. This shall include, as a minimum:

	a) Document the existing remaining useful life of the pavement b) Describe the riding quality of all sealed roads in IRI for both traffic lanes c) Describe the riding quality of all unsealed roads in IRI for both traffic lanes d) Describe the extent and depth of edge-drop off between sealed road edge and shoulder e) Document the extent of cracking of the road surface f) Document the extent and type of any sealed wearing course defects (flushing, stripping etc) g) Measure the extent and depth of any rutting. h) A report specifying the results of the above testing and measuring. Where any of these measures have been detrimentally affected during the period of the project construction, the proponent shall provide to Northern Grampians Shire Council a recommended course of action to rectify the works to the satisfaction of Northern Grampians Shire Council. Within two weeks of the completion of the projects construction and cessation of use of the proposed construction transport route within the municipality, the proponent shall perform a post construction assessment of structures affected by the work. This shall include, as a minimum: • Document the condition of each structure, including crack mapping of any existing cracks (including widths) • Where the condition of the structures has been detrimentally affected during the course of the project construction, the proponent shall provide to Northern Grampians Shire Council a recommended course of action to rectify the works to the satisfaction of Northern Grampians Shire Council. Once Northern Grampians Shire Council is satisfied with the proposed method of rectification works and has approved any drawings and specifications necessary to undertake the rectification, the proponent shall complete the works within four weeks of Northern Grampians Shire Council approval. The works shall be executed to the satisfaction of Northern Grampians Shire Council and the Responsible Authority.
9	Plans and Drawings Prior to the commencement of construction, the proponent shall submit for review and approval drawings and specifications of any works deemed necessary as part of the Pavement Management Plan, Road Safety Plan or Traffic Management Plan, to the satisfaction of the Northern Grampians Shire Council and the Responsible Authority. The drawings and specifications shall conform to the AustRoads guides, relevant Australian standards and DTP technical notes. No windfarm construction works shall commence on site until the roadworks shown on the approved drawings have been delivered by the proponent. Once approved, these plans shall be endorsed and must not be modified except with the written consent of the Responsible Authority in consultation with Northern Grampians Shire Council.
10	Independent Engineering Review The proponent must pay the reasonable costs of the Northern Grampian Shire Council for engaging a suitably qualified and experienced engineer to undertake independent review and oversight of the design and construction of the development. The independent engineer may be engaged by the Northern Grampian Shire Council for the purpose of: a) Reviewing engineering plans, reports and technical documentation submitted in relation to the development.

	b) Undertaking inspections of works during construction. c) Liaising with the permit holder or its contractors regarding engineering matters associated with the development. d) Providing advice to the Northern Grampian Shire Council in relation to engineering compliance and performance of the works. The permit holder must reimburse the Northern Grampian Shire Council for the reasonable costs of the independent engineer on a monthly basis, or at such other intervals as agreed by the Northern Grampian Shire Council. All costs must be paid to the satisfaction of the Northern Grampian Shire Council.
11	Regional Project Coordination Plan Before development starts, a Regional Project Coordination Plan must be prepared and submitted to and approved by the Responsible Authority. The plan must be prepared to the satisfaction of the Responsible Authority and must include: a) Identification of other major renewable energy or infrastructure projects proposed, approved or under construction within the region that may have overlapping construction periods. b) Consultation with the proponents of those projects, relevant government agencies and local authorities to better understand anticipated construction timelines, workforce numbers and peak labour demand. c) An assessment of the potential cumulative impacts arising from concurrent project construction, including but not limited to workforce accommodation, traffic and transport networks, local services and community infrastructure. d) Measures to coordinate construction activities where practicable to minimise cumulative impacts on the local community, infrastructure and labour supply. e) A framework for information sharing and ongoing coordination with other project proponents and relevant authorities during the construction phase. f) A process for monitoring and updating the plan where project timing or workforce estimates materially change. Once approved, the Regional Project Coordination Plan must be implemented to the satisfaction of the Responsible Authority.
12	Workforce Health Services Plan Before development starts, a Workforce Health Services Plan must be prepared and submitted to and approved by the Responsible Authority, in consultation with the relevant local health service providers and the Northern Grampians Shire Council. The plan must be prepared to the satisfaction of the Responsible Authority and must include: a) An assessment of the anticipated workforce numbers during each stage of construction and operation of the development. b) An assessment of the potential demand for health and medical services generated by the project workforce, including general practice, emergency care and other relevant health services. c) Measures to ensure that the health care needs of the project workforce are met without placing unreasonable demand on existing local health services. d) Provision of dedicated health services for project workers, which may include on-site or project-funded medical services. e) Where appropriate, arrangements for collaboration with local health service providers to augment their capacity, including funding, staffing, facilities or service agreements to support increased demand. f) Procedures for communicating health service arrangements to all workers and contractors. g) A framework for ongoing liaison with local health service providers during construction.

	Once approved, the Workforce Health Services Plan must be implemented to the satisfaction of the Responsible Authority.
13	Workforce Accommodation Strategy Before development starts, a Workforce Accommodation Strategy must be prepared in consultation with proponents of other major infrastructure and energy projects in the region and be submitted to and approved by the Northern Grampians Shire Council and the Responsible Authority. The Strategy must be prepared to the satisfaction of the Northern Grampians Shire Council and the Responsible Authority and must include: a) An assessment of the anticipated workforce numbers associated with the development during each stage of construction and operation. b) Identification of the likely accommodation demand generated by the project workforce, including peak workforce periods. c) Consultation with the proponents of other major projects in the region, including the Western Renewables Link (WRL), VNI West and the Joel Joel Battery Energy Storage System, to better understand construction timelines, workforce numbers and cumulative accommodation demand. d) An assessment of the capacity of existing housing (both for sale and rental) and short-term accommodation within the municipality and surrounding region to accommodate the project workforce. e) Measures to ensure that the accommodation needs of the project workforce do not place unreasonable pressure on existing housing supply or short-term accommodation, including avoidance of displacement of local residents, and impacts to the Shire's tourism industry. g) Measures to support the delivery of additional permanent housing within the municipality, which may include partnerships with Council, developers or registered housing providers, financial contributions toward housing supply, or other mechanisms that facilitate the construction of new housing. h) Identification of a suitable location for a workers camp to provide temporary worker accommodation. i) A framework for ongoing coordination with other major projects in the region to monitor workforce accommodation demand and adjust mitigation measures where required. Once approved, the Workforce Accommodation Strategy must be implemented to the satisfaction of the Responsible Authority and must not be modified except with the written consent of the Responsible Authority in consultation with Northern Grampians Shire Council.
14	Workers Camp Prior to the commencement of construction works, plans showing the location and design of a workers camp to provide worker accommodation shall be prepared and submitted to satisfaction of the Northern Grampians shire Council and the Responsible Authority. This workers camp must: a) Be in a suitable location within the Northern Grampians Shire Municipality, in proximity to the project area b) Be located and designed to minimise impact on surrounding sensitive land uses by way of noise, visual, dust or other emissions. c) Be located in a lower risk area with respect to bushfire and flooding d) Be located near a larger town that can provide trunk infrastructure e) Provide reusable buildings and infrastructure that can be repurposed at the end of the project. f) Be serviced with all necessary utilities and amenities g) Be of sufficient size to cater for the predicted workforce

	h) Include a traffic management plan to identify traffic routes to and from the site, and include management strategies to and from the site, i) Include details of any proposed decommissioning of the workers camp and reuse of infrastructure Once approved, these plans shall be endorsed and must not be modified except with the written consent of the Responsible Authority in consultation with Northern Grampians Shire Council. Once approved, the workers camp must be developed and operational prior to the commencement of construction works.
15	Detailed Biosecurity Management Plans Prior to the commencement of works, detailed biosecurity management plans must be prepared for each affected farming property, in conjunction with and to the satisfaction of each impacted landowner and submitted to and approved by the Responsible Authority. The plan must be prepared to the satisfaction of the Responsible Authority and must include: a) Identification and mapping of existing biosecurity risks within and surrounding the site, including declared weeds, pest plants, pest animals, and known plant pathogens. b) Procedures to prevent the introduction or spread of weeds, pests and diseases during construction, operation, maintenance and decommissioning of the wind energy facility. c) Hygiene protocols for all vehicles, machinery and equipment entering or leaving the site, including requirements for clean-down procedures and designated wash-down locations where necessary. d) Measures to manage soil disturbance, stockpiling, topsoil handling and movement of materials to prevent the spread of weeds or pathogens. e) Measures to manage construction compounds, laydown areas, access tracks, cable trenches and turbine pads to minimise biosecurity risks. f) Procedures for the identification, treatment and ongoing management of weeds and pest species introduced or spread as a result of the development. g) Protocols for workers, contractors and visitors, including site induction requirements relating to biosecurity. h) Measures to minimise impacts on surrounding agricultural activities, including livestock production and cropping. i) A monitoring, reporting and response framework, including responsibilities for implementation of the plan. j) Requirements for periodic review and updating of the Biosecurity Management Plan. Once approved, the Biosecurity Management Plan must be implemented and complied with at all times to the satisfaction of the Responsible Authority.
16	Screening Vegetation Plan Before development starts, a Screening Vegetation Plan must be prepared by a suitably qualified person and submitted to and approved by the Responsible Authority. This Screening Vegetation Plan must address the Moderate and Substantial visual impacts of the proposal on the nearby dwellings as identified and outlined in the <i>“Probable Visual Effect Assessment on Residential Properties”</i> report. This Screening Vegetation Plan must be prepared to the satisfaction of the Responsible Authority and must include: a) The location, extent and layout of screen planting required to minimise visual impacts of the development when viewed from surrounding roads and neighbouring properties. b) Details of all proposed trees, shrubs and groundcovers including species, plant numbers, planting densities and pot sizes.

	c) Identification of planting designed to provide effective long-term visual screening, including the use of locally indigenous or appropriate species capable of achieving suitable height and canopy density. d) Details of site preparation, planting methods, irrigation (if required), mulching and protection of plants from stock or wildlife grazing. e) A staged implementation program for planting. f) A maintenance program including watering, weed control and the replacement of any dead, dying or diseased plants. Once approved, the Screening Vegetation Plan must be implemented to the satisfaction of the Responsible Authority. All landscaping must be maintained and any dead, dying or diseased plants replaced to the satisfaction of the Responsible Authority.
17	Concrete Batching Plants – Operational and Environmental Management Prior to the commencement of construction, the permit holder must submit a Concrete Batching Plant Management Plan to the satisfaction of the Responsible Authority. The plan must be prepared by a suitably qualified professional and include, but not be limited to: a) The number, location, and layout of all concrete batching plants associated with the development, including separation distances to nearby dwellings and sensitive land uses. b) Hours of operation for each batching plant, including start and finish times to be restricted to standard daylight construction hours. c) Noise assessment for each batching plant, including cumulative noise from multiple plants and other construction activities, with reference to relevant Victorian noise standards and guidelines. d) Dust and air quality management, including measures to minimise dust emissions from aggregate handling, cement transfer, vehicle movements, and other batching operations. e) Traffic and access management associated with the batching plants, including truck movements, internal circulation, and any heavy vehicle routes to or from the site. f) Mitigation measures to minimise environmental and amenity impacts on nearby sensitive receptors, including dwellings, workplaces, and agricultural operations. g) Monitoring and reporting procedures to ensure compliance with the approved plan, including processes for responding to complaints and incidents. The Concrete Batching Plant Management Plan must be implemented for the duration of construction to the satisfaction of the Responsible Authority.

Appendix 2 – Comments Register

Comment ID	Report/Chapter Revision	Section/location	Comment
1	Agricultural Impact assessment	Summary	The Agricultural Impact Assessment identifies biosecurity as the most substantive risk to existing farming enterprises, however no clear details as to how biosecurity is to be managed are proposed. This needs to be addressed by way of condition.
2	Planning report	3.3.2.2	Planning report indicates construction of peak employees' numbers will be up to 260 employees for the wind farm and 120 for the BESS. This report indicated that the majority of construction workforce would be accommodated in surrounding towns including Stawell as the nearest major town. The report indicates that an accommodation and employment strategy will be developed to ensure effective management housing and accommodation - however it doesn't address the actual provision of any additional housing which would be required to cover the significant additional population. An accommodation and employment strategy (which has not yet been developed) is not considered sufficient to address the current lack of housing in the surrounding area, and it remains unclear where the significant workforce will be accommodated in a manner which will not significantly adversely impact on the local populations of nearby communities. Provision of additional housing should be made a requirement of the permit and should be required to be delivered prior to commencement of construction works
3	Social Impact Assessment	Overall Comment	The report seeks to play down negative impacts and does not propose meaningful actions to mitigate these impacts.
4	Social Impact Assessment	Table 2.1, page 11:	The list of nearby projects omits the Western Renewables Link (WRL) and VNI West. These two projects and their cumulative effects have not been assessed.
5	Social Impact Assessment	Figure 2.2, page 12	On the Social Locality map is unclear from the figure what is the disturbance footprint (in legend, but cant see on the map), and what is the wind farm operating area. It is also unclear what the darker area in the middle of the lower half of the map is.
6	Social Impact Assessment	Figure 2.3, page 13	Two projects on the map are unidentified and WRL and VNI West are unidentified.
7	Social Impact Assessment	Table 2.3, page 20	The table suggests that the level of engagement, using the IAP2 spectrum, with NGSC has been "involve". This is inaccurate and engagement was in fact between "inform" and "consult".

8	Social Impact Assessment	Table 3.1 Strategic and Governance Plans	This table includes multiple references to plans that have been superseded, replaced or not longer exist. References to these plans should be removed or updated based on comments below. If these reports have influenced any sections of this report, these sections should also be updated. • The Wimmera Southern Mallee Regional Growth Plan 2014 has been replaced by Plan for Victoria 2025. • The Northern Grampians Renewable Energy Transition Action Plan, DRAFT 2023 remains a draft. This plan was never progressed beyond a draft, and never adopted by Council. It also predates a lot of the current policy direction coming out of the State Government in relation to the transition to renewables, along with a number of renewable energy projects within this Shire. It also does not reflect Councils current views. • The 2021-2025 Council Plan was replaced by the 2025-2029 version which was adopted in October 2025. The references to strategic plans that are outdated, superseded or no longer relevant is concerning, and raises broader concerns about the accuracy of the technical reports and the information that has been relied upon to prepare them.
9	Social Impact Assessment	Table 3.3, page 34	Proximal Proposed Projects, significantly underestimates the potential cumulative impact of the two transmission line projects adjacent to the project. The table rates cumulative impact as “possible” and refers to “potential for minimal overlapping construction timelines.” The construction timelines overlap substantially, and the likelihood of cumulative social impacts is almost certain (see table to the right showing construction overlap. All reports that assess the projects impact, need to be updated to accurately reflect the cumulative impact on the project, including overlapping construction timelines.
10	Social Impact Assessment	Page 56	The report significantly understates the number of workers on WRL. WRL’s website refers to 700 construction workers. The report omits worker numbers for Joel Joel BESS and VNI West. The report states “it is likely that any use of rental homes will constrain supply for locals and potentially increase rental prices”. “Likely” is a significant understatement; the risk of constraining supply of housing and increasing prices is almost certain. The report refers to growth opportunities in south Stawell, yet commits no actions to realising the housing potential, and does not acknowledge the fact that to be available for the project, housing construction would need to commence well ahead of the project construction. The proponent should be required to coordinate with other major energy projects in the region to more accurately identify the timelines, workforce numbers, and cumulative impacts of the multiple projects being developed.
11	Social Impact Assessment	Section 5.3.2.2. page 56	Appears to assume that the only visits to local health services are due to workplace injuries. With a workforce of up to 360, workers will need to access local health care for a wide range of health issues apart from work injuries.

12	Social Impact Assessment	Page 57 and Page 52	Page 57 refers to a 36-month construction period, whereas figure 5.3 on page 52, PDF 66 shows a 25-month construction period. Which one is correct?
13	Social Impact Assessment	Page 63	The Social Impact assessment states: "Currently the Community Benefit Program and Neighbour SBS is based on a minimum investment of \$1,000/MW or \$360,000 per annum over the 35 years of the Project, equating to around \$10 million across the Project's operation." NGSC expects the amount for the neighbour payments and the community benefit fund to be separated. Therefore, it is unclear how much would end up in the community benefit fund compared to the neighbour payments.
14	Social Impact Assessment	Page 71	Page 71 states "Scheduling of construction activities and more collective strategies to address housing and accommodation issues are just some of the key cumulative impacts requiring a more strategic focus and assessment". This acknowledgement of the need for collective and strategic action is welcome, but the project proposes no action along these lines.
15	Social Impact Assessment	Page 73	Overstates the magnitude and likelihood of a range of project impacts, many of which appear to be conjecture. For example, the report assert that an Accommodation, Employment and Procurement Strategy will have a positive impact when the PPA makes no commitments to any actions within it. Similarly, page 76 asserts that a yet-to-be developed strategy with no identified actions will reduce the negative impact of the construction workforce is speculative.
16	Social Impact Assessment		Social Impact assessment indicates that the 'Future Growth Area Master Plan (NG SHIRE 2024) "presents a significant opportunity for wind farm developers to collaborate with council to house their workforce" The Stawell Future Growth Area Master Plan is in its embryonic stages, with significant further strategic work including rezoning of the land required to unlock this land for residential development. Given the timeframes proposed for delivery of the Watta Wella windfarm this potential future growth area cannot be relied on to accommodate the proposed workforce
17	Social Impact Assessment - Overall comment		There has been a lack of meaningful engagement from the proponent throughout the development of the project. Early engagement, including discussion of key issues, and opportunity to review technical reports, would have assisted Council and the proponent in terms of early identification, and potential resolution, of key issues. Engagement on these issues within a 28 statutory referral timeframes, significant impacts opportunity for meaningful engagement and influence.

18	Worker Housing	The PPA states that the project will have up to 380 workers during construction. The PPA states that the project does not propose to provide dedicated worker housing, and that the proponent will prepare an Accommodation and Employment Strategy. The NGSC and surrounding local government areas have an extremely low rental vacancy rate and very low unemployment. If workers are to move to the region to work on the project, they will add to competition for housing. If workers in the region change jobs to work on the project, their employers will be challenged to recruit replacement workers due to the lack of housing in the area. The project development will coincide (at least in part) with three other projects: Joel Joel BESS, immediately adjacent to the Watta Wella Wind Farm, Western Renewables Link, and VNI-West. The PPA does not identify or address any cumulative impacts on worker housing of the four projects. To mitigate the negative impact on worker housing availability, the project should - implement a temporary worker camp during construction, and - work with NGSC to identify opportunities to invest in permanent housing in the Shire that will be available for other workers once the project is complete. Australia's housing crisis is being strongly felt in our region. We are experiencing a significant and pre-existing housing crisis that this project and its construction workforces will exacerbate. That statement that no worker accommodation is proposed is unacceptable to our community. Housing availability in our region is poor with significant housing shortages. Housing and accommodation markets in the region are characterised by a lack of diversity of housing types and sizes, extremely low rental vacancy rates, rapid rent price growth, and a low quantity of commercial accommodation. The lack of housing availability is already a major constraint to economic activity and service provision across the region. The Commonwealth Government's 2024 Budget papers state that a 3% vacancy rate is considered a balanced rental market, with lower vacancy rates representing tight rental markets. There is a range of publicly available data on rental vacancy rates that shows that Northern Grampians Shire Council has as 0.45-0.98% rental vacancy rate.
19	Traffic Impact Assessment	The application states that transport of wind turbine generators and other equipment to the site will include transport on NGSC roads: Joel Joel Road, Joel South Road, and Landsborough Road. NGSC expects that these roads will also be used by the other energy projects in the Shire at the same time. NGSC has previously experienced costly damage to its roads during the construction of multiple energy projects that it has not recovered from project developers, as all project developers denied responsibility for damage. Project developers carrying out works in the NGSC's road reserves need NGSC's consent under the <i>Road Management Act 2004</i> (Vic). When considering consent applications under the Act, NGSC will seek to ensure that project proponents do not leave any unremediated damage, including providing adequate financial security to protect the Council's interests. The NGSC expects RES to coordinate with the other project developers in the Shire to demonstrate to Council how they will manage their collective impacts on the Shire's roads, reduce cumulative impacts, and ensure that any road damage can be accurately attributed.

20	Traffic Impact Assessment		The TIA contains significant shortfalls which impair NGSCs capacity to assess the impact of the proposal on NGSC's assets.
21	Traffic Impact Assessment	5.4.1	The TIA identifies an increase in ESA's during the construction of the windfarm by more than 500%. This would indicate that there is an extreme risk of complete pavement failure. Additionally, the construction of the BESS would increase ESA's by more than 100%. This is in addition to the impact of other significant projects planned to occur simultaneously with this project (VNI-West & WRL)
22	Traffic Impact Assessment	1.5	The TIA is silent on any impact that the OSOM may have on any structures within the municipality. The TIA hasn't included an assessment of the load carrying capacity of the bridges on the OSOM route; including two structures (one bridge, one culvert) with significant existing structural deficiencies. They rejected NGSC's preferred route. There has been no assessment of whether the existing structures are suitable. Conditions need to address the significant shortfall in information from the proponent.
23	Traffic Impact Assessment	5.5	The methodology used to assess the impact on road safety due to the increase in traffic is deeply flawed. It is inconceivable to suggest that the current road safety observations are in any way relevant when traffic volumes as a result of this project are expected to increase by more than 50%, particularly where there has been 9 accidents occurring within the area under consideration and all within 100 km/hr zones. The proponent shall use a modern method such as iRAP/AusRAP or some other approved equivalent to assess the impact of the project.
24	Traffic Impact Assessment		The TIA assumes that all the rock for the project will be sourced from Tuckers Hill, south of Great Western and that it would be transported via Stawell to the site. The assumption is that the rock will all be sourced from one location (Tuckers Hill) as well as the transport traffic taking the long, slow route via Stawell rather than via Salt Creek Road. There's no guarantee that trucks will use the long route and there is the risk of significant damage to our assets if this route isn't the actual route used. For instance, we have a bridge that is already showing signs of distress (Sandy Creek Rd Bridge - BRG124993) which would be on the shorter Salt Creek Road route. We want them restricted to their proposed route (Stawell via Landsborough Rd).
25	Traffic Impact Assessment	2.3	The TIA fails to identify how it guarantees that the construction traffic will use the nominated routes. All traffic is being directed along Landsborough Road; however, there are alternative routes from the Tuckers Hill quarry that are 6 km's shorter and that avoid Stawell altogether (such as through Salt Creek Road). Whilst the route identified is the route preferred by NGSC, there is no guarantee that traffic will actually use that route. Particularly since most heavy vehicles proposed will have an 'as-of-right' to use alternative routes as well as the fact that there are other quarries that could provide material that are alternatives to Tuckers Hill.

26	Traffic Impact Assessment	6.2	The applicant recommends an infrastructure agreement is entered into with NGSC in relation to the impact on the road pavements but doesn't provide any details.
27	Aviation Impact Assessment		Reference to plan that has been superseded, replaced or no longer exist. References to these plans should be removed or updated based on comments below. If these reports have influenced any sections of this report, these sections should also be updated. e.g. Reference to 2014 Stawell Airport Masterplan Review, which has been replaced by Stawell Aerodrome Master Plan Specialist Airport Solutions Pty Ltd for Northern Grampians Shire Council, 2023
28	Historic Heritage Assessment		No reference was made to the Northern Grampians Heritage Study (Revised Interim Edition) April 2024, Taylor, P., Jacobs, W., Rowe, D. for the Northern Grampians Shire Council, which provides a substantively updated Thematic and Environmental History.
29	Various Assessments		A number of assessments e.g. noise, visual, shadow flicker are based on existing dwellings. What is the likelihood that there are any approved but not yet constructed dwellings in the project area? This information should have been sought by the proponent and formed part of the assessments.
30	Shadow Flicker Assessment	ii	"Out of the seven dwellings predicted to experience shadow flicker, one is predicted to experience theoretical shadow flicker durations above the Draft National Guidelines recommended limit of 30 hours per year within 50 m of the dwelling (involved dwelling 2). The theoretical shadow flicker durations at dwelling 2 exceed the recommended limit by more than 30 hours per year. When considering the likely reduction in shadow flicker due to cloud cover and rotor orientation, the predicted actual shadow flicker durations within 50 m of dwelling 2 remain above the Draft National Guidelines recommended limit of 10 hours per year". The report states that "Considering the above results, some form of mitigation is likely to be required to manage the shadow flicker impacts at dwelling 2 where the shadow flicker limits are exceeded. The effects of shadow flicker may be reduced through a number of mitigation measures such as the removal or relocation of turbines, the use of smaller turbines, installation of screening structures or planting of trees to block shadows cast by the turbines, or the use of turbine control strategies to shut down turbines when shadow flicker is likely to occur. Shadow flicker exceedances can also be managed through establishing agreements with potentially affected landholders. The proponent has advised that the turbines predicted to cause shadow flicker at dwelling 2 are located on the landowner's property [3]". Details confirming what mitigation measures should be provided, and ensuring this will adequately resolve the matter should be provided prior to a decision being made on the application.
31	Landscape and Visual Assessment	68-69	This section of the report outlines the visual impact on properties. It refers to existing boundary vegetation, and uses this to discount the visual impact. It is unclear whether this vegetation is located on the affected property or an adjoining property. If an adjoining property (albeit on the boundary), it should not be relied upon for discounting

			visual impact, as the affected property landowner has no control over the retention of this vegetation.
32	Landscape and Visual Assessment	68-69	The report notes the following visual impacts - 5 were rated as having a slight increasing to moderate visual effect, 10 were rated as having a moderate visual effect, 1 was rated as having a moderate increasing to substantial. The report states that "The potential for mitigation planting recommended in the report and is likely to further reduce the visual effect on the properties over time as the new trees and shrubs mature and complement the existing screening vegetation. The proposed mitigation measures are recommended to be undertaken in consultation with the landowner".
33	Probable Visual Effect Assessment on Residential Properties		This report indicates moderate to substantial impacts on several nearby dwellings. Planting of additional vegetation is suggested as a potential mitigation measure - but no details of what will be planted or where is proposed
34	Landscape Character and Probable Visual Effect Assessment	58	This report identifies that moderate to substantial impacts on views from key locations (including Big Hill Lookout) will occur however offers no remediation or solution to reduce visual impact.
35	Concrete Batching	Various Reports	The Planning Report refers to the establishment of multiple concrete batching plants to support construction of the development. However, the report does not clearly specify the number, scale, or exact location of these batching plants. Concrete batching plants are industrial operations that can generate notable impacts including noise, dust emissions, heavy vehicle movements, lighting, and extended operating hours, particularly during large-scale construction projects. Despite this, the Noise Impact Assessment does not appear to include any assessment of the proposed batching plants, nor does it consider the potential cumulative noise impacts associated with their operation. This omission is concerning given that batching plants typically involve activities such as aggregate handling, conveyor operation, cement transfer, truck loading, reversing alarms, and early morning start-up activities, all of which have the potential to generate noise that may impact nearby sensitive receptors. In addition to noise impacts, batching plants can also be a source of dust emissions, particularly from aggregate handling, vehicle movements, and cement storage and transfer. These impacts can affect nearby residents, agricultural land uses, and local air quality if not properly assessed and managed. Given the potential for these facilities to generate amenity impacts, further information is required to properly assess their acceptability. In particular, the application should clearly identify: • The total number of concrete batching plants proposed.

			• The precise location of each batching plant, including separation distances to nearby dwellings and sensitive land uses. • The hours of operation, including whether the plants may operate outside standard daytime construction hours. • The expected throughput and scale of operations. • The noise impacts associated with plant operation, including cumulative impacts with other construction activities. • The potential for dust emissions and the proposed mitigation measures. Without this information and the necessary technical assessments, it is not possible to adequately evaluate the potential amenity impacts associated with the proposed batching plants or determine whether the proposal can appropriately protect the amenity of nearby residents and surrounding land uses.
36	Risk Management Plan		This report identifies that risk of turbine fires as rare, and cited limited examples. There have been a number of documented turbine fires in Victoria, South Australia and NSW in recent years, including one at the adjoining Bulgana Windfarm in May 2025. Council does not accept the risk assessment and conclusions of this report.