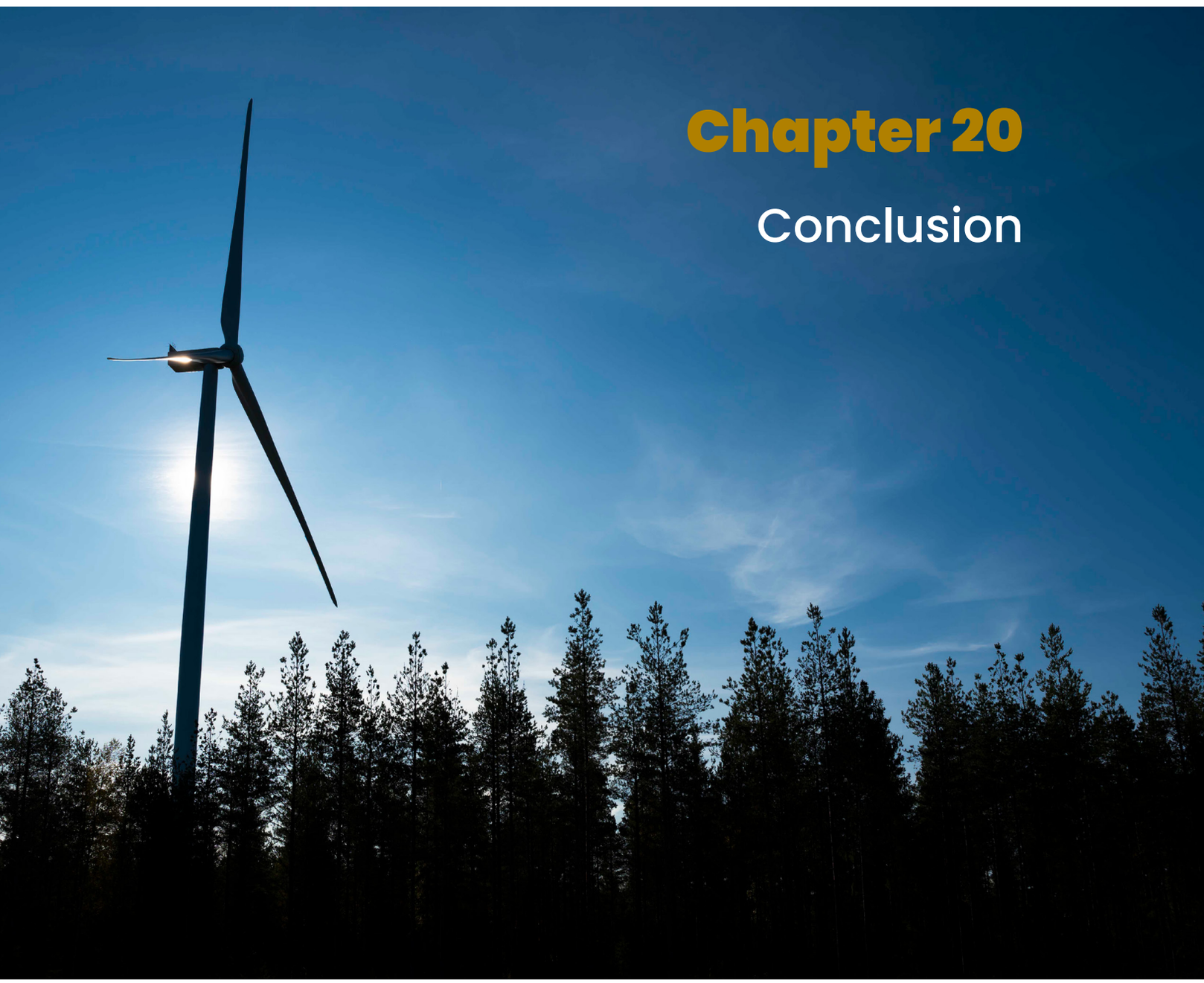

Chapter 20

Conclusion

Acknowledgement of Country

Neoen Australia acknowledges the traditional custodians of the land in which we live, and pays its respects to their elders, past and present. The Gunditjmara are the original custodians of the Country on which the Project is located and we acknowledge them as the original custodians. We are committed to Aboriginal engagement and reconciliation and aim to bring Aboriginal and Torres Strait Islander people, local communities and the councils along for the journey to strengthen relationships and enhance local community outcomes.

Disclaimer

20 Conclusion

20.1 Overview

This chapter concludes the Environment Effects Statement (EES) for the Kentbruck Green Power Hub (the Project) and provides an overview of how the assessment has responded to the *Scoping Requirements for Kentbruck Green Power Hub Environment Effects Statement* (Scoping Requirements) issued by the Victorian Minister for Planning (the Minister).

This 600-megawatt (MW) wind farm could contribute approximately five per cent of Victoria's electricity generation, a substantial step towards the achievement of the state's renewable energy targets. The Project is estimated to involve a $1.2 billion infrastructure investment, creating up to 350 jobs during construction and 14 jobs when operational. It has also been selected for Commonwealth Government's competitive Capacity Investment Scheme's Tender 1 – NEM generation. It is the only Victorian wind farm to qualify for this round. The CIS aims to create jobs, reduce pressure on energy bills, and lower emissions. It supports Australia's clean energy transition and complements other programs under the Powering Australia Plan.

The wind energy facility (wind farm) is proposed in an area with consistent high wind speeds, a strong grid connection, and has received positive feedback from surrounding communities during consultation undertaken as part of the EES process. It is predominantly located in an actively harvested pine plantation, which minimises impacts on native vegetation and biodiversity.

The coastline near Portland experiences some of the strongest winds in Victoria. Strong wind speeds mean competitively priced electricity for Victorian consumers, as well as reliable electricity generation, which supports energy security in our changing grid. Building a wind farm in the windiest possible location also means less turbines are required to generate the electricity that Victorians need today and into the future.

Locating the Project within a pine plantation is a decision Neoen Australia Pty Ltd (The Proponent) made to minimise impacts on native vegetation. It also creates synergies with existing plantation infrastructure and operations; existing roads can be improved during wind farm construction, improving access including for fire response. Several jurisdictions are recognizing the benefits of co-locating renewable energy infrastructure within operational plantations including the NSW Forestry Corporation, which ran a process in 2023 to actively partner with wind farm developments within its operations. Further afield, wind farms are common in northern European forests across Germany and the Nordic states, and The Proponent is operating the Mutkalampi wind farm in a plantation in Finland.

Potential impacts of the Project have been assessed by technical specialists covering 20 technical areas. The benefits of the Project have been evaluated against the overall significance of potential adverse effects of the Project, within the context of applicable legislation, policy, strategies, and guidelines. The outcomes of these assessments have informed the iterative design development of the Project, and the preparation of mitigation measures to avoid, minimise and manage potential adverse impacts where they have been identified. These are included in **Chapter 19 Environmental Management Framework**.

20.2 Integrated assessment

This section provides an integrated assessment of the Project with consideration of the draft evaluation objectives set out in the Scoping Requirements and the legislative and policy setting in Victoria.

The draft evaluation objectives set out in the Scoping Requirements describe the desired outcomes to be achieved for each of the matters addressed in this EES. The Scoping Requirements provide six draft evaluation objectives which the Project has addressed through a range of technical studies prepared by specialist consultants and other investigations and assessments.

20.2.1 Biodiversity and habitat

The biodiversity and habitat draft evaluation objective is *to avoid or minimise potential adverse effects on biodiversity values within the project site and its environs, including native vegetation, listed species and ecological communities other protected species and habitat for these species.*

This evaluation objective was addressed in the following technical reports and EES chapters:

- Chapter 7 - *Biodiversity*
- Chapter 8 - *Brolga*
- Chapter 9 - *Surface water, groundwater and groundwater dependent ecosystems*
- Flora and Fauna Existing Conditions and Impact Assessment (FFIA) (Appendix C)
- Brolga Impact Assessment (Appendix D)

- Southern Bent-wing Bat Impact Assessment (SBWB Impact Assessment) (Appendix E)
- Surface Water Impact Assessment (Appendix F)
- Groundwater Impact Assessment (Appendix G)
- Groundwater Dependent Ecosystem Impact Assessment (Appendix H).

Most of the wind farm site is within a radiata pine commercial timber plantation. Native vegetation is limited to road reserves, small remnant patches excluded from plantation development, and regeneration of native understory species in plantation areas. The wind farm site also includes several areas of farmland, which have been cleared of native vegetation and are used primarily for dryland grazing by sheep and cattle. The cleared paddocks are dominated by introduced grasses, with scattered native species present close to adjacent areas of public land.

The proposed transmission line travels underground beneath an existing road through the Cobboboonee National Park and Cobboboonee Forest Park (the Parks), and then underground through agricultural land to connect to the existing Heywood Terminal Station, south of Heywood.

The Project is near several conservation reserves with high biodiversity values, including Lower Glenelg National Park, Discovery Bay Coastal Park, Cobboboonee National Park and the Glenelg Estuary and Discovery Bay Ramsar site (the Ramsar site). These conservation reserves provide habitat for a diverse range of species, including several threatened flying species (birds and bats) that are known to or may have potential to fly through the Project Area.

Wetlands within the Project Area include some small areas near the southern boundary of the wind farm adjacent to the Discovery Bay Coastal Park, wetlands within cleared farmland in the eastern portion of the wind farm, wetlands near the underground transmission line route through the Parks and near Heywood terminal station. There are also extensive areas of wetlands within the Ramsar site of which several contain habitat for Brolga.

The Proponent has commissioned several technical studies to understand the biodiversity and habitat values that are present within and around the Project Area. Investigation into the biodiversity values of site and surrounds have been ongoing for more than five years and has involved some of the most significant monitoring campaigns undertaken for a wind farm in Victoria.

The Project has sought to respond to biodiversity and habitat values through site selection, project design development (including iterative design development in response to the impact assessment findings), and development of management and mitigation measures (including adaptive management responses) to manage potential residual impacts and risks.

Mortality of threatened avifauna species due to collision with turbines has been identified as the most significant potential ecological impact from the Project. The Proponent worked with a team of specialist ecological advisors to implement design changes in response to this potential impact, including:

- Removal of turbines from within 500 metres (m) of wetlands in the Ramsar site.
- Removal of turbines within 300 m of parks and conservation reserves.
- Buffers around Brolga (*Antigone rubicunda*) breeding and foraging habitat.
- Removal of turbines from within 5 kilometres (km) of known Southern Bent-wing Bat (*Miniopterus orianae bassanii*) (SBWB) roosts.

These changes were made to reduce collision risk for bird and bat species that use these habitats, particularly SBWB and Brolga, but also other threatened species such as Australasian Bittern (*Botaurus poiciloptilus*).

The minimum blade tip height of turbines was increased from 45 m above ground level to 60 m. Results of the bird utilisation studies, bat call studies, and known flight height data for many species of birds and bats were used to inform this decision. Birds and bats flying between the ground and 60 m would avoid collision risk.

Direct impacts from construction of the Project, such as removal of native vegetation or disturbance of habitat, have been avoided and minimised as much as practicable through site selection and design development of the Project.
The decision to site the Project in an actively harvested pine plantation is the most impactful measure for avoiding native vegetation removal.

Having designed to avoid as many impacts as possible, construction of the Project would require removal or assumed losses of 8.696 ha of native vegetation, including impacts on 228 large trees. 3.755 ha of this removal is for construction of the underground transmission line, however, the majority of this is due to major encroachment on tree protection zones (TPZ) and does not involve direct removal.

The Proponent has selected a reduced impact construction methodology for the transmission line to avoid and minimise potential effects. The section of the transmission line that traverses the Parks, beneath Boiler Swamp Road, is proposed to be built using integrated trenching machinery that excavates, lays the cable, and backfills the trench in a single pass, within a 6.5 m construction corridor in the existing road formation (Boiler Swamp Road). Underboring (horizontal directional drilling (HDD)) will also be used to minimise impacts on the root systems of the *Flora and Fauna Guarantee Act 1988* (Vic) (FFG Act) critically endangered Apple Jack (*Eucalyptus splendens*) along Boiler Swamp Road.
This innovative construction methodology has been investigated by The Proponent to avoid and minimise potential impacts on the root systems of native vegetation adjacent to Boiler Swamp Road.

424 trees would be affected by incursions of more than 10 % of the tree protection zones. These effects have been included in the calculation of native vegetation losses and associated offsets in accordance with the *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP, 2017). 699 trees would also be affected by minor encroachment (less than 10 % of the TPZ).

Measures have been proposed to manage potential residual impacts on native vegetation during construction, including establishing no-go zones and use of the reduced impact construction methodology for the transmission line. Plans will also be prepared to ensure that retained native vegetation and associated habitat values are protected during construction, including a Native Vegetation Plan, a Flora and Fauna Management Plan, and a Construction Environmental Management Plan (CEMP). Offsets will be sought for any native vegetation losses that are unavoidable.

Collision risk has been assessed as being negligible or not significant for most avifauna species, including Orange Bellied Parrot (*Neophema chrysogaster*), South-eastern Red-tailed Black Cockatoo (*Calyptorhynchus banksii*), and White-throated Needletail (*Hirundapus caudacutus*). The Project has been conservatively assessed as having a low to moderate likelihood that it would have some impact on individual mortality by collision with turbines or power lines and this impact is most likely to be from individuals moving seasonally between coastal and inland wetlands. Specific measures to further monitor and avoid potential impacts on Australasian Bittern have also been developed, including the use of bird diverters on transmission lines and adaptive management strategies to be incorporated into the Bird and Bat Adaptive Management Plan (BBAMP)

A detailed bat study program was undertaken involving acoustic surveys at ground locations and at height (up to 84 m above ground level), bat call analysis, and wind speed analysis. The program was designed to identify the number of calls made by individual bat species at height and under different wind speeds across a 12-month period. The study had a particular focus on the SBWB, which was recorded flying throughout the wind farm site. Of the 1,292 confirmed, probable or complex calls recorded at the site, only one call was recorded within the proposed rotor swept area of the turbines. Turbine collisions at the wind farm were determined to be unlikely to result in a long-term decrease in the size of the SBWB population.

Seasonal nocturnal low wind speed curtailment is proposed to be implemented. Curtailment specifications, including cut-in wind speed, will be finalised during preparation of the BBAMP and will include consideration of seasonality, time of day, temperature and rainfall. Any additional curtailment will be conducted as part of scientific trials, including intensive monitoring and reporting, to evaluate effectiveness of the curtailment in eliminating or reducing mortalities.

A Brolga Compensation Plan will also be prepared prior to construction commencing, involving the identification of appropriate compensation strategies to ensure net zero impact in accordance with the *Interim guidelines for the assessment, avoidance, mitigation and offsetting of potential wind farm impacts on the Victorian Brolga population* (DSE, 2012) (the Brolga Guidelines). The Compensation Plan will include quantifiable measures of compensation, with a key focus on the restoration and management of wetlands to improve brolga breeding success.

Turbine collision and avifauna mortality will be monitored through the implementation of a BBAMP, which will provide a strategy for minimising bird and bat strike, including a regime for monitoring collision mortality, criteria for determining significant impacts, trigger levels for management responses and adaptive management responses to further minimise the collision risk.

Potential impacts on the Ramsar site were also assessed against the biodiversity and habitat draft evaluation objective, however a more detailed assessment was undertaken in relation to the catchment values and hydrology draft evaluation objective, as described in **Section 20.3.**

With the implementation of mitigation and management measures, it is considered that the Project satisfies the biodiversity and habitat draft evaluation objective, to avoid and minimise adverse effects on biodiversity values, including native vegetation, listed species and communities, and habitat for these species.

Legend

- Original Wind Farm Site
- Original turbine layout
- Turbines removed or relocated
- Public Land 300m Buffer
- Ramsar Site 500m Wetlands Buffer
- Brolga Breeding Habitat Buffers
- Brolga 300m Movement Corridors
- Properties Removed From the Project
- Campsite
- McLennans Punt 5km Bat Buffer
- Groundwater Depths Less than 6m

Image Source: ESRI Basemap (2022) Data source: DELWP (2021)

FIGURE 20.1

Changes made to the turbine layout due to the adoption of biodiversity buffers

20.2.2 Cultural heritage

The cultural heritage draft evaluation objective is *to avoid or minimise adverse effects on Aboriginal and historic cultural heritage and associated values*. This evaluation objective was addressed in the following technical reports and in **Chapter 11 Cultural heritage**:

- **Aboriginal Cultural Heritage Technical Report (Appendix J)**
- **Historical Heritage Assessment (Appendix K**).

Aboriginal cultural heritage

There are 18 currently known Aboriginal places identified within the Project Area. Turbine and associated construction works are not anticipated to impact on these registered Aboriginal places as the Project design has been revised to avoid direct impacts. There is potential for the required road and access networks to impact registered Aboriginal Places, however where these impacts are identified, the Project will aim to avoid or mitigate impacts through altered construction design that will protect and preserve the Aboriginal places.

A Cultural Heritage Management Plan (CHMP) (17822) is being prepared to assess and manage the impacts to the registered Aboriginal place and previously unregistered Aboriginal cultural heritage in accordance with mitigation measures. The CHMP has identified generally more and denser Aboriginal cultural heritage presence towards the coastline as well as a shift in the type of Aboriginal cultural heritage expected moving away from the coastline.

Predictive modelling has been developed using inputs from the Gunditj Mirring Traditional Owners Aboriginal Corporation (GMTOAC). The predictive modelling focuses on using interpretations of predicted culturally sensitive Chromosol sediments and geomorphological interpretations of the landform (karst identification and elevation associations with cultural heritage). The model has been developed in consultation with GMTOAC and The Proponent to facilitate greater understanding of the potential Project impacts on cultural elements in the landscape.

The CHMP will allow for an appropriate level of assessment of registered and previously unregistered Aboriginal heritage places identified during the preparation of the CHMP and will provide appropriate management conditions to avoid, minimise or mitigate the impact on these places.

While in some cases harm to Aboriginal cultural heritage would not be able to be avoided, the CHMP will allow the collection of scientific and cultural data that may otherwise be unrealised and provide alternatives for potential impact areas. The preparation of the CHMP will similarly allow for the implementation of management strategies to protect those places which would not be impacted directly by the proposed works from inadvertent harm. The management conditions will be guided in consultation with GMTOAC. The approved CHMP will also provide contingency measures, with clear instructions if previously unregistered items of Aboriginal cultural heritage are identified during construction works.

A Cultural Values Assessment (CVA) has also been undertaken by the GMTOAC as part of the Indigenous Land Use Agreement process, with sponsorship by The Proponent, to identify intangible Aboriginal cultural values present in the Project Area. The CVA and CHMP complex assessment will provide a more complete view of Aboriginal heritage values in the Project Area and allow for the identification of further opportunities to avoid, mitigate and manage any impacts and for the Project to enhance those values, e.g. through partnerships with Traditional Owners and Aboriginal communities.

GMTOAC will continue to be consulted and involved where practicable, before, during, and after the construction phase. GMTOAC Research Principles and Guidelines must be employed to ensure that Gunditjmara Country and cultural values are respected and protected during the operational phase of works.

It is therefore considered that the Project satisfies the relevant Aboriginal cultural heritage draft evaluation objective, to avoid or minimise adverse effects on Aboriginal cultural heritage and associated values.

Historical heritage

Two historical heritage sites are located within the Project Area. The Former Kentbruck School site is located within the wind farm site. Direct impacts on the site have been avoided through strategic placement of Project infrastructure, and indirect impacts will be avoided by implementing a range of mitigation measures including employee/contractor inductions, identifying the site on design and construction plans, onsite demarcation of the site, and avoidance of the site during any micro siting. Consent from Heritage Victoria (HV) under the *Heritage Act 2017* (Heritage Act) would be required if any Project works are to be undertaken within the extent of the site.

The Boiler Swamp Sawmill is located on the southern side of Boiler Swamp Road adjacent to the transmission line corridor. The Boiler Swamp Sawmill has been delisted from the Victorian Heritage Inventory so is no longer protected under the Heritage Act, but will be afforded the same level of protection by the Project as other historical sites including the Former Kentbruck School. An exclusion zone will be placed around the site to help prevent impacts from occurring. If impacts are unavoidable, The Proponent will consult with HV to determine whether the boiler should be moved back to its original location, to a local museum, or to a safe location nearby.

The proposed works have been sited to avoid direct impacts on the historical, architectural, or archaeological values of known historical heritage places within the Project Area, and the identified management measures will ensure that indirect impacts are unlikely to occur.

It is therefore considered that the Project satisfies the relevant historical heritage draft evaluation objective, to avoid or minimise adverse effects on historic cultural heritage and associated values, and that significant residual impacts on the historical, architectural and archaeological values of known historical heritage places are unlikely to occur.

20.2.3 Catchment values and hydrology

The catchment values and hydrology evaluation objective is *to maintain the functions and values of aquatic environments, surface water and groundwater quality and stream flows and prevent adverse effects on protected beneficial uses.* This evaluation objective was addressed in the following technical reports and chapters of the EES:

- **Chapter 9 Surface water, groundwater, and groundwater dependent ecosystems**
- **Chapter 10 Soil contamination and acid sulfate soils**
- **Surface Water Impact Assessment (Appendix F)**
- **Groundwater Impact Assessment (Appendix G)**
- **Groundwater Dependent Ecosystem Impact Assessment (Appendix H)**
- **Environmental Site Investigation (Appendix I).**

Surface water

Project construction activities have the potential to impact sensitive local downstream receiving waterbodies through the unmitigated mobilisation of sediment and/or pollutants, changes in water quality, and changes in stream hydrology/stability. The implementation of industry best practice mitigation measures such as treatment of stormwater collected in excavations prior to discharge, and installation of sediment control devices, will ensure potential residual impacts on surface water are managed during Project construction. Once operational, the Project is unlikely to have surface water impacts including on protected environmental values.

Groundwater and groundwater dependent ecosystems (GDEs)

The excavation of turbine foundations, cable trenches and the onsite quarry has the potential to impact on groundwater flows and quality if groundwater is intersected and requires dewatering. Groundwater is shallow in the eastern end of the wind farm site, where it is known to be within a few metres of the ground surface during summer and near surface in winter. Turbines were removed from this part of the wind farm site to avoid collision risk for birds and bats, but underground cabling would pass through the area to connect the remaining wind turbines to the main wind farm substation. Any groundwater dewatering required would therefore be associated with cable trenching.

The shallow depth of trenching along the underground cabling routes would limit the potential to penetrate a significant depth below the water table, and dewatering (if required) would be carried out for a short duration only (hours rather than days) immediately prior to installation of the cable and backfill. Drawdown away from any trench sections being dewatered would be negligible at distances beyond around 5 m. Potential impacts on consumptive use bores or GDEs from any dewatering required for cable installation would therefore be negligible.

Mapped potential GDEs intersect the underground cabling routes in the eastern end of the wind farm site. Vegetation communities associated with these GDEs will have adapted to seasonal changes in the water table (i.e. they do not require a constant water table to meet their water requirements) so will have a degree of tolerance to seasonal variation in groundwater levels. Any groundwater drawdown required for cable trenching is not expected to measurably impact on the water use of this vegetation given that the short duration of predicted impacts (hours) would be within seasonal variations.

Groundwater is generally deeper throughout the plantation area. Where shallow groundwater was identified (within 6 m of the ground surface (mbgs)), turbines were moved to avoid the potential for groundwater intersection during turbine foundation excavation. Any turbine micro-siting within the plantation will avoid the areas where groundwater is less than 6 mbgs to avoid intersecting groundwater. This will ensure that there is no hydrological pathway by which the Project could impact GDEs located in the Ramsar site which use the local groundwater systems, thereby avoiding impacts on the ecological character of the Ramsar site.

The Project also has the potential to reduce groundwater levels through groundwater extraction for water supply. Groundwater supply bore(s) for the Project would aim to target the lower portions of the Upper-Mid Tertiary Aquifer (UMTA), which is between 30 and 250 mbgs, to reduce the potential for interaction with the shallow groundwater system (which appears to be accessed by consumptive use bores and GDEs). Impacts associated with groundwater supply would therefore be unlikely to occur, but additional water supply investigations will be undertaken in consultation with Southern Rural Water prior to any take and use licence application once the locations of all groundwater supply bores have been determined.

To ensure that the conclusions reached in relation to potential effects on GDEs are verified and any unforeseen impacts suitably managed, a GDE Monitoring and Management Plan will be developed prior to construction commencing and will include commitment to measure groundwater levels in target and background bores to measure changes to hydraulic gradient.

Once operational, the Project is unlikely to have groundwater impacts on GDEs and protected environmental values.

Contamination and acid sulfate soils

Detailed field investigations, involving broadly spaced intrusive investigations, did not find any soil contaminant concentrations above laboratory limits of reporting or relevant guidelines. It is considered unlikely that previously unidentified contamination would be encountered during Project construction that could result in a long-term and irreversible impacts to human health or the environment. The CEMP will include an unexpected finds protocol that details the procedures to be implemented if any unexpected contamination is found during construction.

Acid sulfate soils (ASS) were found in low-lying areas of the wind farm site east of Portland-Nelson Road and within farmland in the transmission line corridor, east of the Parks. Potential impacts due to the disturbance of ASS would be dependent on the nature, extent and magnitude of construction activities and their interaction with the natural environment, but could result in the excavation of significant volumes of ASS and the release of metals and acidity into the surrounding environment.

An ASS Management Plan will be developed and implemented to manage ASS and any associated waters during Project construction. ASS management strategies to minimise impacts will include avoiding or minimising disturbance of ASS and preventing oxidation, planned treatment or neutralisation of ASS and any run-off or acid leachate that might be generated, and reuse of treated ASS or disposal of ASS as appropriate.

Peat is known to occur in low-lying areas of the wind farm site, east of Portland-Nelson Road. When dry, peat areas are highly vulnerable to ignition and the resulting fires are extremely difficult to extinguish without re-establishing natural groundwater levels. A peat assessment will be undertaken in the high risk areas of the Project Area to determine whether peat would be impacted by excavation activities and to identify whether the underground cabling can be micro-sited to avoid areas of peat. A Peat Management Plan will be developed which details the safe work practices to be implemented when working in areas with peat and the remediation works required if these areas are disturbed.

With the implementation of the proposed measures for mitigating and managing potential contamination, peat, ASS, surface water and groundwater impacts, it is considered that the Project satisfies the catchment values and hydrology draft evaluation objective, to avoid or minimise adverse effects on surface water, groundwater, GDEs and associated values. It is also considered that the Project is unlikely to have significant residual impacts on catchment values and hydrology.

20.2.4 Landscape and visual

The landscape and visual draft evaluation objective is *to minimise and manage potential adverse effects on landscape and visual amenity.* This evaluation objective was addressed in the following technical reports and in **Chapter 12 Landscape character and visual amenity** of the EES:

- **Landscape and Visual Impact Assessment (Appendix L)**
- **Shadow Flicker and Blade Glint Assessment** (**Appendix M**).

The Project Area and immediate surrounding landscape have an overall medium to high level of sensitivity to accommodate change, with areas of higher sensitivity located along the coast and around the Glenelg Estuary and Glenelg River. Some key landscapes, including those associated with the Discovery Bay Coastal Park and sections of the Great South West Walk (GSWW), may experience visual alterations to landscape character due to the Project which, in some coastal areas, may not be fully mitigated by existing landscape features or features visible within the landscape. Conversely, some areas including campsites and day use areas along the Glenelg River and within adjoining national parks, have a greater ability to absorb change due to the extensive tracts of native tree cover that screen views toward the Project.

A 2 km buffer has been applied around campsites near the wind farm site to mitigate views of turbines from these locations. Turbines would be visible from Lake Mombeong campsite, day use area and pathways towards and around the lake, as well as some sections of the Lake Mombeong inland track. At a distance of 2 km, the wind turbines would form dominant elements within the available view. Views from these locations are likely to experience a moderate to high visual impact. Some potential visual effects may be mitigated through strategies to identify and screen sensitive view locations within the Mombeong campsite and surrounding area. Mitigation works to be undertaken in consultation and conjunction with Parks Victoria and the GSWW committee might consider additional planting strategies to increase levels of screening at specific sensitive viewpoint and/or to install/upgrade existing infrastructure to benefit people at Lake Mombeong or those travelling between the lake and ocean beach.

Some turbines would be visible from parts of the GSWW, including along a 30 km section of the Discovery Bay foreshore south of the wind farm site. While some partial views of upper portions of the turbines (hubs and blades) would be visible from the ocean foreshore beach, views toward wind turbines would be mitigated to some extent by sand dunes (and associated vegetation) rising above the foreshore. Views from the majority of the 250 km GSWW would not extend toward the Project Area or wind turbines.

The wind farm site and surrounding areas are sparsely populated. A total of 50 non-involved dwellings have been identified within 10 km of the wind turbines, five of which are considered to have a high visual effect from the Project. Soft landscape works (tree and shrub planting) will be installed at non-involved dwellings within 10 km of wind turbines where the Project would result in Moderate - High to High visual effects. Landscape works would aim to filter or screen views toward wind turbines.

Direct and proximate views toward electrical infrastructure, including the wind farm substations and overhead powerline, would be mostly limited to the Portland-Nelson Road corridor. Tree cover within and beyond the plantations has a high visual absorption capability, which would mitigate the extent and level of visual impacts. Views from sensitive landscape areas and non-involved dwellings would also be mitigated by existing tree cover and landform, however soft landscape works may be installed at non-involved dwellings subject to views of this infrastructure.

Worst case shadow flicker modelling determined that shadow flicker is likely to exceed 30 hours per year at two involved landowners (receptors 21and 675). Exceedances were also predicted at Receiver 674, however this receiver is identified as a working shed and not a dwelling and therefore no further consideration of potential shadow flicker effects is required The Proponent has agreements in place with the landowners of non-involved receivers 21 and 675, who acknowledge and accept this exceedance Wind turbine blades will be coated with a non-reflective finish to avoid possible effects of blade glint on surrounding dwellings, in accordance with the *Planning Guidelines for the Development of Wind Energy Facilities in Victoria* (DTP, 2023).

With the implementation of soft landscaping works at the non-involved dwellings with views of Project infrastructure, and the removal of turbines to minimise landscape character and visual amenity impacts at public locations, it is considered that the Project satisfies the landscape and visual draft evaluation objective, to minimise and manage potential adverse effects on landscape and visual amenity. It is also considered that the Project is unlikely to have significant residual impacts on visual amenity and landscape character.

20.2.5 Land use and socioeconomic

The land use and socioeconomic draft evaluation objective is *to avoid and minimise adverse effects on land use, social fabric of the community, local infrastructure, aviation safety and to neighbouring landowners during construction, operation and decommissioning the Project.* This evaluation objective was addressed in the following technical reports and EES chapters:

- **Chapter 16 Land use and planning**
- **Chapter 17 Socio-economics**
- **Chapter 18 Safety, hazard, and risk**
- **Land Use and Planning Impact Assessment (Appendix Q)**
- **Social Impact Assessment (SIA) (Appendix R)**
- **Economic Impact Assessment (EIA) (Appendix S)**
- **Aeronautical Impact Assessment (Appendix T)**
- **Electromagnetic Interference Assessment (Appendix U).**

Land use and planning

The use and development of the Project is permissible under the Glenelg Planning Scheme (the Planning Scheme), subject to the issue of a planning permit (or planning scheme amendment). The Project has been developed with consideration of the objectives of the Planning Scheme and is consistent with all applicable State and regional policies relating to the provision of renewable energy.

The findings of the EES demonstrate that the Project is able to manage the tensions of the Planning Scheme, specifically Clause 12.02 (Marine and Coastal Environment) and Clause 12.05 (Significant Environments and Landscapes) against Clause 17.01 (Employment) and Clause 19.01 (Energy). The Planning Scheme does not weigh any of the objectives of these clauses higher than the others, and the Project responds to environmental sensitivities in the area with a carefully managed outcome and robust mitigation and management measures, while also putting forward a net community benefit.

Land use impacts during construction of the Project would be temporary and primarily associated with the use of public roads and land, notably during construction of the underground transmission line through the Parks. Once operational, the Project would have minimal impact on public land uses, agricultural activities and existing infrastructure. Land within the wind farm site that is not required for wind farm infrastructure would continue to be used for forestry and grazing. It is estimated that approximately five per cent of the Project Area would be used for the wind turbines, access tracks and other operational Project infrastructure.

Maintenance requirements for the wind farm and transmission line would be minimal. Underground assets are expected to be largely maintenance free, with monitoring of powerline function and performance to be undertaken remotely. Maintenance activities would be limited to areas immediately adjacent to the operational infrastructure, and would be coordinated with relevant landowners to minimise any disruption.

Areas of agricultural land uses affected by the Project (forestry and farming) will be rehabilitated to pre-development condition or as otherwise agreed with the relevant landowners, and there is not expected to be any long-term adverse effect on current uses.

It is considered that the Project satisfies the relevant land use and planning draft evaluation objectives, to avoid and minimise adverse effects on land use, local infrastructure, and to neighbouring landowners, and that significant residual land use impacts are unlikely to occur.

Socio-economic

Construction of the Project would help support businesses in the Glenelg Local Government Area (LGA) and across the State more broadly, with the potential to generate up to $167.2 million for the Glenelg LGA and up to $668.7 million for the State of Victoria (assuming 25 % employment from the study area). Operation of the Project has potential to generate up to $49.9 million for the Glenelg LGA, and up to $62.3 million for the State of Victoria.

The Project would also have a range of social benefits, including the provision of training and upskilling for local people, and local employment and procurement opportunities. An estimated 350 employees would be required to construct the Project, with close to 253 full-time workers required across the State during the two-year construction period, 52 of which are expected to be apprentices and trainees. There is strong and consistent evidence that the provision of apprenticeship and trainee opportunities during construction would benefit the individuals involved by increasing their probability of employment and their expected hourly weekly wage rate in subsequent years. The Proponent will also implement a Shared Benefits Strategy to ensure the rewards of the Project are proactively and purposefully shared with local communities.

The temporary local population increase during construction and decommissioning has the potential to impact on access to short term accommodation, local infrastructure and services, and recreational areas. Construction and decommissioning works may also disrupt existing land uses, including agricultural operations on host properties and access through the Parks, and generate amenity, recreation, and visual impacts within the local area, affecting how people experience their surrounds and sense of place.

Some stakeholders perceived that rural property values associated with land, houses, or property adjacent to, or within eyesight of the Project's infrastructure, would be reduced because of the Project and be detrimental to people's livelihood and futures. However, research indicates that there are no statistically relevant correlations between wind farms and property values, especially in rural areas. Marginal economic impacts would result from permanent land acquisition for the transmission line over the medium-to-long term once compensation arrangements have been accounted for.

The following strategies and plans will be implemented to mitigate and manage potential adverse socioeconomic impacts of the Project and to enhance beneficial outcomes:

- Community Engagement Strategy
- Communications Plan
- Shared Benefit Strategy
- Aboriginal Participation Plan
- Local Participation and Social Procurement Strategy
- Workforce Accommodation Management Plan.

It is therefore considered that the Project satisfies the relevant socioeconomic draft evaluation objectives, to avoid and minimise adverse effects on the social fabric of the region, local infrastructure, and to neighbouring landowners. It is also considered that the Project is likely to have significant beneficial socio-economic impacts and unlikely to have significant adverse residual impacts.

Aeronautical

Potential aeronautical impacts resulting from operation of the wind farm were identified to assess aircraft safety hazards associated with nearby aerodromes and air routes. There are two certified aerodromes within 30 nautical miles of the wind farm boundary (Mount Gambier (YMTG) and Portland (YPOD)), as well as uncertified airstrips at Nelson and Kentbruck. The Project will not impact on operation of YMTG or the uncertified air strips.

Portland Aerodrome has an Obstacle Limitation Surface (OLS) of 15 km. and as the wind farm site is located 18.5 km from the Portland Aerodrome, the Project would not affect the OLS. However, some of the wind turbines would impinge on the instrument approach procedures (IAP) of the Portland Aerodrome, which are a series of predetermined manoeuvres for an aircraft approaching the aerodrome to land. This will require that the 25 nautical metre (nm) and 10 nm Minimum Safe Altitudes and IAPs be raised to remain clear of the Project, along with some other changes to the aerodrome instrument approaches. The Glenelg Shire Council, as operator of the Portland Aerodrome, has written to Airservices Australia supporting the required changes.

The Aeronautical Impact Assessment determined that the overall risk of the Project to aviation is low, and that the wind farm is not a hazard to aircraft safety. Obstacle lighting is therefore not required for the Project.

The Project will be reported to the Civil Aviation Safety Authority (CASA), and Airservices Australia will be notified in accordance with *AC 139-08(1) Reporting of Tall Structures* to ensure the position of wind turbine and met masts are included within the vertical obstacle database and marked on aeronautical charts. Other measures to improve visibility of the Project infrastructure will be implemented, including painting of the met masts in accordance with the *National Airports Safeguarding Framework – Guideline D Managing the Risk to Aviation Safety of Wind Turbine Installations (Wind Farms)/Wind Monitoring Towers* (DOIT, 2012) and the use of marker balls, high visibility flags or sleeves on the guy wires of the met masts.

With the implementation of these mitigation measures and changes to the Portland Aerodrome IAPs, it is considered that the Project satisfies the relevant aeronautical draft evaluation objective, to avoid and minimise adverse effects on aviation safety, and that significant residual aeronautical impacts are unlikely to occur.

Electromagnetic interference

Project construction activities are not expected to result in impacts on radio systems due to electromagnetic interference (EMI). Once operational, the Project has the potential to disrupt the radio signal of dwellings on the southern side of the wind farm. the Proponent will engage an independent specialist to undertake a pre- and post-construction assessment of the television reception strength at the location of dwellings within 5 km of any turbine and will take action to restore any unacceptable levels of interference to pre-construction quality.

The wind farm site obstructs a small area of radar coverage from the Mount Gambier weather watch radar and initial consultation with the Bureau of Meteorology (BoM) has identified that the wind farm will likely have an impact on the radar station. the Proponent will continue to consult with BoM on the exact terms of the operational limits and/or other technical solutions for the Project to ensure that the radar can maintain operational efficiency.

With the implementation of these mitigation measures, it is considered that the Project satisfies the relevant EMI draft evaluation objective, to avoid and minimise adverse effects on local infrastructure and to neighbouring landowners, and that significant residual EMI impacts are unlikely to occur.

20.2.6 Community amenity, safety, roads and transport

The community amenity, safety, roads and transport draft evaluation objective is *to avoid and minimise adverse effects for community amenity and safety, with regard to construction noise, vibration, dust, traffic and transport, operational turbine noise and fire risk management*. This evaluation objective was addressed in the following technical reports and EES chapters:

- **Chapter 13 Air quality**
- **Chapter 14 Noise and vibration**
- **Chapter 15 Transport**
- **Chapter 18 Safety, hazard, and risk**
- **Environmental Noise Assessment (Appendix P)**
- **Air Quality Impact Assessment (Appendix O)**
- **Transport Impact Assessment (TIA) (**Appendix Q)
- **Bushfire Risk Assessment and Mitigation Plan (Appendix W).**

Noise and vibration

The Project is anticipated to generate noise during both construction and operation. A total of 40 receivers were identified within 5 km of the proposed turbines, comprising 34 non-involved receivers on properties that are not associated with the Project (15 residential dwellings and 19 campsites), and six residential dwellings on properties associated with the wind farm (involved receivers).

Noise levels associated with each of the main construction activities have been predicted at the nearest receivers and are considered typical for the construction of a wind farm. The highest noise levels are predicted to occur during cable trench digging for the transmission line near a non-involved receiver east of Cobboboonee Forest Park. However, the works associated with these construction activities would progress relatively quickly and these levels would therefore only be expected to be reached for a short period of time.

A construction Noise and Vibration Management Plan will be prepared prior to construction commencing on the Project. The plan will include details of the mitigation measures to be implemented to reduce the risk of harm from construction activity noise and vibration and to fulfil the general environmental duty under the *Environment Protection Act 2017* (EP Act) and achieve the noise limits determined in accordance with the Noise Protocol.

Predicted noise levels for operation of the wind farm have been calculated using sound power levels of four candidate turbine models. The results demonstrate that wind turbine noise levels associated with the Project are predicted to comply with the noise limits for all receivers and candidate wind turbines. In addition, the predicted noise levels during operation of the wind farm substations are below the applicable noise limits so are unlikely to result in noise impacts on nearby receivers.

A pre-construction noise assessment will be prepared and submitted to the responsible authority demonstrating that the wind farm will achieve compliance with the operational noise requirements established in accordance with *NZS 6808:2010 Acoustics – Wind farm noise*. The pre-construction noise assessment will be based on the final wind turbine layout, representative noise emission data for the final selected turbine model and the location of all receivers around the wind farm. Noise levels of other operational infrastructure including the substations, will also be reviewed once equipment selections have been finalised, to ensure that they are below applicable noise limits. A Noise Management Plan will be prepared and implemented during operation to ensure compliance with operational noise requirements as per the pre-construction noise assessment.

It is therefore considered that the Project satisfies the relevant noise and vibration evaluation objectives, to avoid and minimise adverse effects for community amenity with regard to construction noise and vibration, and operational turbine noise. It is also considered that the Project is unlikely to have significant residual noise and vibration impacts.

Air quality

Potential air quality impacts from the Project are expected to be limited to construction and decommissioning activities when there is potential for dust to be generated, such as during vehicle movements, earthworks, and activities associated with the quarry and construction of turbine foundations, access tracks and underground powerlines. A total of 13 sensitive human receptors were identified within 350 m of the Project Area, comprising 12 residential dwellings and one campsite. Sensitive ecological receptors, including the Ramsar site, were identified within 50 m of the Project Area boundary.

Unmitigated dust impacts on sensitive human and ecological receptors from construction activities are medium to low. However, with the implementation of industry standard mitigation measures, the residual impact would be negligible. In addition, the progressive way the construction works would be carried out and the distances between construction activities and sensitive receptors, would further minimise potential dust impacts. Air quality impacts during operation of the Project are expected to be negligible and primarily associated with the use of light vehicles on existing access roads for operation and maintenance activities.

It is therefore considered that the Project satisfies the relevant air quality draft evaluation objective, to avoid and minimise adverse effects for community amenity with regard to dust, and that significant residual impacts on air quality are unlikely to occur.

Transport

Potential transport impacts associated with the Project would predominantly occur during construction and decommissioning. The TIA identified the following key traffic and transport-related risks of the Project:

- Limited existing capacity of the local road network to accommodate the Project workforce and heavy vehicle movements during construction.
- Intersection upgrades required to ensure access for transport vehicles to site.
- Road/lane closures on major roads for transporting over-dimensional/oversize overmass (OD/OSOM) materials to site and resulting disruption to local landowners and road users.

- Closure of sections of Boiler Swamp Road during construction of the transmission line for members of the public, and reduced accessibility for emergency vehicles.
- Safe site access for Project vehicles and other road users, particularly during transport of OD/OSOM materials.
- Damage/deterioration to roads from OD/OSOM vehicle use.
- Disruption to vulnerable road and site users such as cyclists and hikers.
- Disruption to public/school bus routes, particularly during transport of OD/OSOM materials to site.

Potential impacts arising from these risks include disruption to landowners and road users in the area, property impacts (e.g. where obstructions must be removed at pinch points for the transport of OD/OSOM materials to site), reduced road condition, and indirect impacts associated with dust or debris from moving vehicles.

A range of mitigation and management measures will be implemented to address these potential impacts. Two TMPs will be prepared prior to Project construction (one for the wind farm and one for the transmission line), which will be implemented during all phases of the Project to minimise disruption to landowners and road users, with consideration of traffic levels, car parking, on-road public transport, pedestrian and bicycle movements, and existing public facilities. The TMPs will be developed in consultation with the relevant road management authorities and be informed and supported by an appropriate level of transport analysis.

In relation to traffic disruption during transmission line construction, two-way vehicle access will be maintained at all times for emergency vehicles along Boiler Swamp Road. Road detours will be used to divert public vehicles onto adjacent roads through the Parks during construction, ensuring that public access is maintained through the Parks. Temporary access arrangements will also be implemented for people using the GSWW and other recreational uses such as horse trails. All traffic management measures will be documented in the transmission line TMP and be developed through consultation with relevant landowners including Victorian Department of Energy, Environment and Climate Action (DEECA) and Parks Victoria.

Maintenance requirements for the wind farm and transmission line would be minimal. Underground assets are expected to be largely maintenance free, with monitoring of powerline function and performance to be undertaken remotely. Emergency vehicle access along Boiler Swamp Road will be maintained at all times during transmission line maintenance activities in the Parks. Public access will be maintained where possible, however some works could require temporary partial road closures and diversions.

It is therefore considered that the Project satisfies the relevant transport draft evaluation objective, to avoid and minimise adverse effects for community amenity and safety with regard to traffic and transport, and that significant residual transport impacts are unlikely to occur.

Bushfire

The risk of fire ignition during construction of a wind farm exists due to the presence of ignition sources including hot works, increased vehicle traffic and vehicles travelling across vegetated areas. The existing risk of bushfire ignition in the Project Area and surrounds is very high. This risk is managed by local Country Fire Authority (CFA) and Forest Industry Brigades. An Emergency Management Plan will be prepared and implemented that includes procedures for managing the risk from bushfire during construction. At a minimum, the plan will:

- Outline the procedures to be undertaken in accordance with different fire danger ratings. As a minimum, work will not be undertaken on days of extreme fire danger or higher, unless for emergency incident, repair or maintenance purposes.
- Outline the induction and other training requirements for staff and contractors working at the site during the Fire Danger Period.
- Include all the information contained within the CFA's *Design Guidelines and Model Requirements for Renewable Energy Facilities* (2023) pertaining to emergency management planning.
- Be developed in accordance with AS 3745:2010 Planning for emergencies in facilities.
- Establish emergency assembly areas, emergency access points, and emergency evacuation procedures.

Sources of fire ignition associated with an operational wind farm include combustible and flammable materials and liquids, inadequate maintenance causing failures within the turbines, or a lack of fire detection systems. A range of design and maintenance mitigation measures will be implemented by the Project to address these risks, including the installation of detection and suppression systems within the nacelle of the turbines and provision of a fuel managed area around the base of each wind turbine to prevent ignition from falling burning materials. Remote shutdown procedures will be implemented for turbine operations during bushfire or reported faults, and suitable firefighting equipment will be available onsite or readily accessible. Static water supplies will be installed at strategic locations across the wind farm site to assist with firefighting operations.

Emergency management procedures will also be implemented to manage a range of hazards including bushfire/grassfire, wind turbine faults and fire, electrical infrastructure faults and fire, and spills/leaks of any dangerous goods. The procedures will specifically consider activities prior to and during days of catastrophic and extreme fire danger ratings and will involve bushfire preparedness audits to identify opportunities to improve bushfire management procedures. the Proponent will liaise with the local CFA brigades and groups to assist with familiarising them with the Project's operations and infrastructure, and a liaison person will be provided to support incident management during bushfires.

With the implementation of these mitigation measures, the Project is not expected to have a significant residual bushfire risk. Conversely, the bushfire risk modelling found that there would be a minor reduction in potential bushfire impacts relating from development of the wind farm, mainly through reduced flame heights in asset protection zones and other cleared areas. It is therefore considered that the Project satisfies the relevant bushfire risk draft evaluation objective, to avoid and minimise adverse effects for community amenity and safety with regard to fire risk management.

20.3 Environmental Management Framework and mitigation measures

The Environmental Management Framework (EMF) in **Chapter 19** of this EES provides a transparent and consistent framework for managing environmental risk and mitigating adverse effects throughout all stages of the Project. Development of the EMF was guided by the Scoping Requirements and relevant legislation, policy and guidelines, including the statutory approvals and consents that will be required for the Project.

Each specialist technical assessment compiled for this EES provides recommendations for appropriate environmental mitigation measures (MMs) to be adopted by the Project, based on the hierarchy of avoid, minimise, manage and compensate, which have informed preparation of the EMF. Impacts have been avoided in the first instance where feasible and practical, then the severity of impacts over spatial extent and time have been minimised, followed by the identification of measures for managing any residual impacts and compensation for any significant residual impacts such as through biodiversity offsets. The purpose of the mitigation measures is to protect identified environmental or social values and meet the EES evaluation objectives. Measures can be implemented through Project design, construction methods and/or operating procedures.

The EMF outlines how the MMs will be incorporated within the approval conditions or within environmental management plans to be pursuant to statutory approvals and ensure that the environmental risks and potential impacts of the Project are effectively managed.

The Proponent (and its contractors) will be responsible for preparing and implementing various environmental management systems (EMS) and other Project specific documentation to monitor and control environmental impacts during design, construction, operation and decommissioning of the Project. The plans will be required to achieve compliance with relevant standards, guidelines and obligations under the Project's statutory approvals and consents and to reflect the MMs provided in the EMF.

The statutory approvals and consents required for the Project will be implemented through a series of robust plans that will be required as conditions of the planning approval. These are identified in the Incorporated Document at Appendix A of the **Planning Scheme Amendment documents** (**Appendix Y).** Contractors will be responsible for reporting compliance to the Proponent, who will be responsible for ensuring compliance and associated reporting to relevant regulators as required.

The key environmental management documents which The Proponent and its contractors will prepare and implement are described in **Table 20.1**.

Table 20.1: Environmental management documentation

Key document	Description	Phase (in effect)
Minister's Assessment of the EES	The Minister's Assessment of the EES provides an assessment of the acceptability of the environmental effects of the project for statutory decision-makers under Victorian law, which must consider the assessment before deciding whether and how a project should proceed. The Minister's Assessment informs approval decisions under relevant Victorian and Commonwealth legislation.	Assessment
Incorporated document	The approval of the PSA will insert a Special Controls Overlay and an Incorporated Document into the Glenelg Planning Scheme. The Incorporated Document will set out the relevant conditions for planning and environmental compliance.	Approval

Key document	Description	Phase (in effect)
Development Plans	In accordance with Clause 7.1 of the draft Incorporated Document, prior to commencement of any buildings and works associated with the Project (, development plans will be submitted to and approved by the Minister. The plans will be fully dimensioned and drawn to scale and will include the matters referenced in Clause 7.1 of the draft Incorporated Document.	Pre-construction
Environmental Management Framework	The EMF outlines clear accountabilities for the delivery of the Project in accordance with the mitigation measures and compliance with relevant environmental laws, approvals, approval conditions, and environmental management plans and procedures. The Proponent will update the EMF and mitigation measures in response to relevant matters and recommendations contained in the Minister for Planning's assessment of the EES. The EMF will be submitted to the Minister for Planning for approval in accordance with Clause 7.5 of the draft Incorporated Document.	Pre-Construction. Construction, Operation, Decommissioning
Construction Environmental Management Plan (CEMP)	The construction contractor(s) will prepare a Construction Environmental Management Plan for their package of works, as required by the project contract and in accordance with the EMF and MMs. The CEMP will include details of processes and responsibilities for: – Complying with conditions of approval, relevant legislation, construction-related mitigation measures and environmental components of the Project contract. – Identifying, managing and monitoring environmental risks and issues during construction and implementing contingency measures. – Using and maintaining plant, equipment, processes and systems to minimise risk of harm from pollution and waste. – Ensuring all substances are handled, stored, used, and transported in accordance with relevant EPA guidelines. • Site inductions, training, competency, and awareness to all personnel engaging in activities associated with construction. • Communication and reporting during construction. • Environmental reporting, monitoring and auditing requirements. • Evaluating compliance with legislative and approval requirements, including mitigation measures. • Managing complaints, incidents, breaches and taking corrective and preventative action, including associated reporting requirements. • Emergency preparedness and response. • Review and continuous improvement. Contractors for the Project will be able to prepare one CEMP for their work or individual CEMPs for components of their works. The CEMP will also be able to be prepared in stages. Contractors may also choose to create a series of sub-plans for the CEMP. The CEMP will be prepared in consultation with stakeholders relevant to the works covered in the plan and as required by any relevant mitigation measure. *Note – not all plans required by the mitigation measures will be sub-plans to the CEMP. The structure of plans and sub-plans will be determined by the contractor to allow for an integrated approach to addressing and managing impacts across the various plans.*	Construction

Key document	Description	Phase (in effect)
OEMP	The operator(s) responsible for commissioning and operation will develop and implement an OEMP, which would be prepared in accordance with the requirements of the EMF and MMs and address potential environmental impacts of commissioning, operation and maintenance activities associated with the Project. The OEMP will identify operational activities and contain procedures and responsibilities for: • Complying with operational mitigation measures, approval conditions, and relevant legislation. • Identifying, managing and monitoring environmental risks and issues during operations and implementing contingency measures. • Using and maintaining plant, equipment, processes, and systems to minimise risk of hard from pollution and waste. • Ensuring all substances are handled, stored, used, and transported in accordance with relevant EPA guidelines. • Site inductions, training, competency, and awareness to all personnel engaging in activities associated with operations. • Communication and reporting during operation. • Environmental reporting, monitoring and auditing requirements. • Evaluating compliance with legislative and approval requirements, including mitigation measures. • Managing complaints, incidents, breaches and taking corrective and preventative action, including associated reporting requirements. • Emergency preparedness and response. • Review and continuous improvement.	Operation
DEMP	The operator will develop a Decommissioning Environmental Management Plan in accordance with the requirements of the EMF and MMs and to address potential environmental impacts of decommissioning activities associated with the Project. The DEMP will identify decommissioning activities and contain procedures and responsibilities for: • Complying with decommissioning mitigation measures, approval conditions, and relevant legislation. • Identifying, managing and monitoring environmental risks and issues during decommissioning and implementing contingency measures. • Using and maintaining plant, equipment, processes, and systems to minimise risk of hard from pollution and waste. • Ensuring all substances are handled, stored, used, and transported in accordance with relevant EPA guidelines. • Site inductions, training, competency, and awareness to all personnel engaging in activities associated with decommissioning. • Communication and reporting during decommissioning. • Environmental reporting, monitoring and auditing requirements. • Evaluating compliance with legislative and approval requirements, including mitigation measures. • Managing complaints, incidents, breaches and taking corrective and preventative action, including associated reporting requirements. • Emergency preparedness and response. • Review and continuous improvement.	Decommissioning

Key document	Description	Phase (in effect)
	The DEMP will be prepared in consultation with agencies relevant to the decommissioning works covered in the plan and as required by relevant mitigation measures.	
Other plans as required by the mitigation measures	The mitigation measures include requirements to develop and implement management plans to avoid, minimise and mitigate potential impacts. Where appropriate, the management plans required by the mitigation measures may be included as sub-plans as part of the CEMP, OEMP, or DEMP, or may be included as stand-alone plans.	All phases
Community and Stakeholder Engagement Plan	A Community and Stakeholder Engagement Plan (CSEP) will be developed and implemented to facilitate ongoing engagement and communications between the Proponent, Project stakeholders, and the broader community throughout the lifetime of the Project. It will include detailed information on the engagement process, including methods of consultation and records of consultation undertaken. It will also detail the communications protocols between the Proponent and its contractors.	All phases
CHMP	Construction of the Project will be undertaken in accordance with the management conditions set out in CHMP 17822 to manage potential impacts on known and unknown Aboriginal places. This plan sits outside of the conditions of the Incorporated Document and is prepared by the Proponent to operate in conjunction with the approved management plans.	All phases
Complaint Investigation and Response Plan	As outlined in the Incorporated Document, a Complaint Investigation and Response Plan will be developed for all phases of the Project's lifetime, that: • Outlines the process for making and recording complaints and their resolution. • Provides a range of avenues (e.g., direct phone number, email) for community members to express their concerns or ask questions. • Specifies response and resolution procedures to ensure timely responses are provided to complaints raised.	All phases
Emergency Response Plan	As outlined in the Incorporated Document, an Emergency Response plan will be submitted and approved by the Minister for Planning and will be prepared in consultation with the CFA and Rural Ambulance Victoria. The plan will include procedures for managing the risk from bushfire during the construction phase and will be updated to cover the operation phase following development finishing.	All phases

The EMF also outlines the procedures to be followed for the preparation, review, approval and implementation of the environmental management plans and procedures. It provides for the regular review and updating of these plans and procedures, as well as independent monitoring, auditing and reporting of compliance. The roles and responsibilities of key stakeholders are defined to ensure that there are clear accountabilities for the implementation of the environmental management requirements.

A proactive compliance monitoring system will be implemented to measure ongoing environmental performance during construction, operation and decommissioning. Detailed monitoring requirements, including monitoring frequency and parameters, will be incorporated into the environmental management plans reflecting approval and regulatory requirements and the scale of environmental risk. Monitoring will include periodic inspections of construction work areas and operational Project elements to ensure MMs are being implemented and are effective in reducing environmental impacts.

The IEA will develop an audit plan, including an audit schedule and audit scopes, to the satisfaction of the Proponent for each Project contract. They would be responsible for implementing the environmental management plans, correcting non-compliance, investigating environmental incidents, conducting regular meetings and undertaking periodic reviews of performance against requirements.

Monitoring results will be reviewed by the Proponent at regular intervals to enable early detection of potential non-compliances (with the CEMP, EMP, EMS and associated sub-plans), non-conformances (with the Operational Environmental Plan (OEMP), Decommissioning Environmental Management Plan (DEMP) and associated sub-plans) and/or other issues. This will help identify whether additional or modified monitoring activities are required to address Project risks.

20.4 Next steps

This EES has been placed on public exhibition. Members of the public can view the EES and make written submissions. At the end of the public exhibition period, the Minister is expected to appoint an EES Inquiry and Advisory Committee to evaluate the effects of the Project, having regard to the EES, the proposed planning scheme amendment, and public submissions. This is likely to include a formal hearing process, during which the Proponent will be able to speak about the Project, and submitters will be able to speak about their submissions. Expert witnesses will also likely make presentations, and the Committee may also ask for certain things to be clarified.

The Inquiry and Advisory Committee will prepare a report at the conclusion of the formal hearing process and provide this to the Minister for Planning. The Minister will then prepare a formal assessment of the environmental effects of the Project that considers the EES, public submissions, the Proponent's response to submissions, and the Inquiry and Advisory Committee's report. The Minister's assessment may conclude that the Project:

- Would have an acceptable level of environmental effects, or
- Would have an unacceptable level of environmental effects, or
- Would need major modifications and / or further investigations to establish that acceptable outcomes would be achieved.

If the Minister determines that the potential environmental effects of the Project are acceptable, statutory approval decision makers would then decide on the granting of those approvals.

The Minister's Assessment will also be provided to the Commonwealth Minister for the Environment who will then determine whether or not to grant approval for the Project under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

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