



SALT CREEK WIND FARM

Complaints Management Plan

September 2018





Salt Creek Wind Farm

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1.0 Introduction

Salt Creek Wind Farm Pty Ltd (the Proponent) is a wholly owned subsidiary of Tilt Renewables Limited (Tilt Renewables).

Tilt Renewables (including Salt Creek Wind Farm Pty Ltd) is committed to managing complaints in a transparent and professional manner. Complaints not handled correctly can incur significant cost through damage to reputation or fines by the regulatory authorities. Complaints also provide an opportunity to improve the way that Tilt Renewables conducts its business.

Tilt Renewables has a company-wide Complaints Handling Procedure which outlines how it will receive and handle operational complaints¹. All reporting, monitoring and evaluation associated with complaints management for the Salt Creek Wind Farm must be in accordance with this procedure.

This Complaints Management Plan has been prepared to specifically address the construction and operation phase of the project, in accordance with Australian / New Zealand Standard AS / NZS 10002:2014 – Guidelines for complaint management in organizations (AS/NZS 10002:2014) and to address the requirements of Planning Permit No. PL06/304.01 (the Planning Permit).



Figure 1: Site Location

1.1 The Project

Salt Creek Wind Farm is located in western Victoria, approximately 5km south of Woorndoo, approximately

¹This procedure has been prepared in line with the Office of the National Wind Farm Commissioner, Complaints Handling Policy, Version 1.4 – 1 August 2016, and is available on the Tilt Renewables website.



15km north of Mortlake, 55km north of Warrnambool and 68km east of Hamilton and 190km west of Melbourne. It is entirely within the Shire of Moyne.

The wind farm site comprises of approximately 750 hectares of grazing land located on the eastern edge of a large landholding operated as the Salt Creek Merino Stud.

The total size of the landowner's holdings is over 2,000 hectares in size and has been operating as sheep grazing land for over 150 years. The proponent and host Landowner have entered into a legal agreement for a commercial lease of the site for a minimum period of 25 years, subject to the option of renewing the lease upon expiry for an additional 25 years.

The wind energy facility includes 15 turbines, with a blade tip height up to 150m, and an installed capacity of 54MW.

The wind energy facility site and adjoining areas are primarily pastoral land used for grazing. Existing infrastructure at the wind energy facility site and on the surrounding land is predominately agricultural in nature and includes isolated homesteads, sheds, access tracks and fencing.

1.2 Objectives and Guiding Principles

This Complaints Management Plan (Plan) has been developed in accordance with AS/NZS 10002:2014 and sets out how the Proponent will respond to complaints received during the construction and operation of the wind energy facility. Specifically, it addressed the requirements of the following conditions of the Planning Permit, relating to the operation of the wind energy facility:

- Condition 7(j) construction complaints associated with the Environmental Management Plan;
- Condition 16 relates to the Noise Complaint Evaluation and Response Plan and Condition 12 specifies that the wind farm must comply with the New Zealand Standard 6808:2010 Acoustics - Wind Farm Noise;
- Condition 20c relating to a protocol to rectify complaints associated with radio and television reception; and
- Condition 29 relating to complaints associated with shadow flicker.

This plan will be implemented generally in accordance with AS/NZS 10002:2014, Tilt Renewables Complaints Handling Procedure, and will be informed by the principles in Table 1 below.

Table 1: General Principles

Principles	
Enabling complaints	<ul style="list-style-type: none">- People focus - everybody has a right to complain- Ensuring no detriment to complainant – complainants will not be adversely affected- Visibility and transparency - information about how and where a complaint may be made to or about the organization is well-publicised.- Accessibility - complaint management system is accessible to everyone- No charges - a complainant should not be charged a fee to complain
Managing complaints	<ul style="list-style-type: none">- Responsiveness – prompt acknowledgement of complaints.- Objectivity and fairness – treating complaints in an objective and unbiased manner.- Equity – treating of complaints in an equitable manner- Privacy and disclosure - information about any individual should only be disclosed or used in compliance with all relevant privacy laws and ethical obligations.- Communication – provide explanations for policies, procedures and decisions in its communication with complainants and with staff.
Managing the parties	<ul style="list-style-type: none">- Conduct of parties, that make clear the behaviour expected of both its staff and complainants.



Principles	
	<ul style="list-style-type: none">- Work health and safety - implement appropriate policies, procedures and practices to ensure the health and safety of its staff involved in complaint management, including identity protection.- Complaint involving multiple parties – provide options for coordinating communication with the complainant including coordinating with different areas within the organisation.- Empowerment of staff - ensure that staff are properly empowered to implement the complaint management system as relevant to their role.
Accountability, learning and prevention	<ul style="list-style-type: none">- Accountability – be clear about the accountability for the operation of its complaint management system- Continuous improvement - responding to and learning from complaints- Prevention of ongoing disputes - develop and implement systems that minimise the possibility of complaints escalating into ongoing disputes.

This Complaints Management Plan combines the following Council endorsed plans:

- Complaints and Evaluation Response Plan endorsed by Council on 23 June 2017.
- Noise Complaint Evaluation and Response Plan endorsed by Council on 23 June 2017.
- EMP endorsed by Council on 23 June 2017



2.0 Methods for Reporting, Evaluation and Reporting

This section outlines the overarching methods for evaluation and response in the event that a complaint is received about the construction or operation of the Salt Creek Wind Farm.

In accordance with AS/NZS 10002:2014, the Proponent will publish a copy of this plan on its website, including contact details. Upon request, hard copy contact details shall be communicated as appropriate to persons who do not have access to the internet.

Complaints can be made via Tilt Renewables general complaints contact details²:

- Email: complaints@tiltrenewables.com
- Phone: 1800 306 118

Alternatively, complaints can be made using the Salt Creek Wind Farm contact details³:

- Email: saltcreekwindfarm@tiltrenewables.com
- Phone: 1800 122 823

A sign will be erected on the wind energy facility site prior to the commission of any turbines, advising of the above complaints contact details.

2.1 Roles and Responsibilities

The key roles of the Proponent (and external team members, as relevant) involved in the implementation of this Plan are set out in table below.

Table 2: Roles

Title	Organisation	Role
Responsible Authority	Regulator	Keep informed
Regulatory Authorities	Regulator	Keep informed
Community and Media Relations	Tilt Renewables	May take a role in liaison with complainant
OEM Site Manager	Vestas	May take a role in liaison with complainant
Production Supervisor - Generation	Tilt Renewables	May take a role in liaison with complainant May take a role in liaison with Responsible Authority, or any other relevant regulatory authorities
Asset Manager – Generation (AM)	Tilt Renewables	Will take initial action on complaint when made by a resident May take a role in liaison with complainant May take a role in liaison with Responsible Authority, or any other relevant regulatory authorities Does ensure complaints are addressed appropriately and adequately closed out Ensure appropriate regulatory authorities are notified

² These details are available here: www.tiltrenewables.com/contact/

³ These details are available here: <https://www.tiltrenewables.com/assets-and-projects/Salt-Creek-Wind-Farm/>



Title	Organisation	Role
Manager Engineering - Renewable Development	Tilt Renewables	Kept informed
Head of Projects	Tilt Renewables	Kept informed
General Manager – Generation and Trading	Tilt Renewables	Kept informed
General Manager – Renewable Development	Tilt Renewables	Kept informed
Senior Leadership Team	Tilt Renewables	Kept informed
CEO	Tilt Renewables	Kept informed

All complaints and their status will be reported to the appropriate Business Unit Management as part of regular internal reporting requirements. The AM will be responsible to ensure that all complaints are addressed appropriately, in accordance with this procedure and adequately closed out.

2.2 General Evaluation and Response Procedure

Complaints Recording

The procedure for reporting and responding to complaints is detailed below:

Condition 7(j) of the planning permit requires 'program for reporting, including a register of environmental incidents, non-conformances, complaints and corrective actions.'

The procedure for reporting and responding to incidents and / or complaints is detailed below:

- All complaints received must be recorded in the Tilt Renewables' Incident Management System
- All complainants will be contacted within 2 business days of a complaint being received. If the complaint is related to noise contact should be within 1 business day.
- The representative of SCWF shall review the activity and if it is not occurring in accordance with the applicable management plan, the activity will cease and not continue until it is modified to comply
- As part of the registration process the complaint response status should be maintained so that the complainant can be informed of the status of the complaint at any time.
- The contact details of the complainant should include:
 - o Name;
 - o Address;
 - o Telephone numbers (home, work and mobile); and
 - o Email Address
- Details of the complaint to be recorded should include:
 - o why the complaint is being made / details;
 - o when the complaint was first made (time and date);
 - o method of contact;
 - o who received the complaint;
 - o complaint handling owner;
 - o any particular personnel the complaint is about (if relevant);
 - o what action the complainant would like taken to see the matter put right;
 - o date of response and immediate actions;



- allocated complaints number shall be to each complaint; and
- attach any copies of correspondence relating to the complaint.
- Emergency complaints will be escalated in line with Tilt Renewables' Emergency Management Process.

Complaints Investigation

- A complaint will be internally assessed and allocated to an appropriate staff member within the department related to the complaint. The assigned person will review all relevant information and may contact the complainant to discuss the matter.
- Complaints will be treated confidentially and in accordance with Tilt Renewables' Privacy Policy. Personal details will only be provided to another organization or persons outside of the company if the complainant agrees.
- Other parties that are relevant to the complaint may be contacted to assess their willingness to cooperate to resolve the complaint. The third parties could be, but are not limited to, external contractors and consultants, neighboring residents, Councils or internal personnel.
- Tilt Renewables will endeavour to resolve all complaints as efficiently and expeditiously as possible with an aim to resolve a complaint within 7 working days. If more time is needed to look into a complaint, the complainant will be notified at the end of this period and provided with an update on likely timeframes to achieve resolution of the complaint.
- The complainant will be provided with an update on the status of the complaint at regular intervals (at least every 10 working days) until it is resolved or closed.
- Business Unit Management may review the outcomes of investigations and internal assessments of complaints managed by front line staff.
- If the complainant is unhappy with the way a complaint is being dealt with or the proposed resolution, the complaint will then be escalated in accordance with the Dispute Resolution process outlined in Section 2.3.

In addition to the above, the AM is responsible for ensuring the appropriate regulatory authorities are notified of any complaints which relate to a potential non-compliance.

Complaints will be brought to closure for any of the below reasons:

- Confirmation received from the complainant that a satisfactory outcome has been achieved;
- Despite best efforts, a satisfactory resolution has not been achieved and it is considered that further time and effort in handling the complaint will not assist with reaching a resolution;
- The complainant advises that they no longer wish to pursue the complaint, or
- Despite best efforts, the complainant cannot be contacted to discuss the complaint.

When a complaint is closed the Complaints Handling Register will be updated.

Significant incidents defined in the EMP

As per the Salt Creek EMP, the AM is responsible for notifying appropriate regulatory authorities of any identified significant incidents or complaints relating to significant incidents. Significant incidents are defined as:

- A pollution incident (i.e. dust, noise, water pollution) results in a complaint from a regulator or community member
- Clean up or potential costs will exceed \$5,000 for an onsite incident



- There is the potential for a legal breach
- Significant impact on people or the environment (flora and fauna) has been / may be caused by the incident
- Native vegetation is accidentally or unintentionally damaged or removed
- Injury or fatality to a native fauna species (including threatened species).

Where a complaint has been made by a resident, the complaint will be initially acted upon by the AM depending on the phase of the project.

2.3 Dispute Resolution

Whilst the aim of complaints management is to resolve complaints at the first level /frontline staff (e.g. appropriate staff member within the department related to the complaint), there may be instances where it may be determined that the complaint should be escalated. This plan sets out the internal escalation and external mediation process should escalation be required.

This process is in line with the three-level model of complaint management set out in AS/NZ 10002:2014.

Internal Escalation Options

Should satisfactory resolution or mitigation look unlikely to be reached with the complainant, internal escalation options may be considered at any point. These include:

- Raise unresolved resolutions / mitigations with the appropriate Business Unit Manager (AM).
- Determine if a reasonably practical alternative resolution or mitigation can be offered.
- Discuss alternative resolution or mitigation with complainant.
- If no satisfactory resolution can be reached, the complainant should be advised of the External Mediation process (outlined below).
- External escalation may allow for assessment and investigation of the complaint via the appropriate accountable industry or government body.

External Mediation

In the event that agreement cannot be reached between the Proponent and complainant, as to resolution of a specific complaint, it may be necessary to seek involvement of an independent impartial third party (i.e. external party, such as the National Wind Farm Commissioner) to facilitate mediation of the matter.

The details of the process and facilitator will depend on the scope of the complaint, issues involved and appropriateness of the facilitator for the matter to be resolved. The Proponent will aim to constructively participate in the required mediation process. If the dispute is not resolved through the internal resolution process, the following mediation system shall be triggered.

- The assigned person reviewing the complaint shall contact the with the AM and provide full details of the complaint, including any preliminary investigations or correspondence with the complainant.
- The AM shall contact the complainant to instigate the appropriate mediation process.
- Mediation will normally occur within 10 working days of both parties agreeing to the appointed mediator.
- The appointed mediator shall organize the time and place for the mediation to occur.
- The applicant and responded may be required to provide the mediator with a brief statement setting out their position with regard to the issues that need to be resolved in addition to other information



requirements.

- At the conclusion of the mediation session the complainant and respondent, with the mediator to prepare a written summary of any resolution for agreement by all affected parties.
- If mediation is not successful, the mediator will report this to the AM and the complainant will be advised of their rights to pursue to the matter further.

2.4 Review

A review will be performed of the Incident Management System and procedure twelve months after commissioning, to ensure that the wind energy facility is meeting all requirements and objectives of this Plan. The procedure will be reviewed annually thereafter during the operation of the wind energy facility.

2.5 Guidance

The following guidance is available regarding the evaluation and management of noise:

- *New Zealand Standard 2010 - Acoustics – Wind Farm Noise. New Zealand Standard NZS 6801 – 1991 Measurement of Sound.*
- *International Electrotechnical Commission standard IEC 61400-11, Wind Turbine Generator Systems – Part 11: Acoustic Noise Measurement Techniques.*
- *Environment Protection and Heritage Council (EPHC), 2010, National Wind Farm Development Guidelines - Draft July 2010.*
- *Department of Environment, Land, Water and Planning, November 2017, Policy and Planning Guidelines for Development of Wind Energy Facilities in Victoria.*
- *Moyné Shire Planning Permit Application No. PL06/304.01- Property : Hexham – Woorndoo Road Woorndoo Vic 3272.*

2.6 Reporting

A report including a reference map of complaint locations, and outlining complaints, investigation and remediation actions is to be provided quarterly to the Responsible Authority, for the duration of the operation of the wind energy facility. The Complaints Handling Register shall be made available to the Responsible Authority on request.

3.0 Noise Complaints Evaluation and Response Plan

This section sets out the methods for evaluation and response (in addition to the overarching methods outlined in Section 2.0) in the event that a noise complaint is received about the operation of the Salt Creek Wind Farm. Specifically, it addressed the requirements of the following conditions of the Planning Permit:

Condition 12

Noise *The operation of the wind energy facility must comply with the New Zealand Standard 6808:2010 Acoustics – Wind Farm Noise (the ‘Standard’), in relation to any occupied dwellings existing on land (other than the site) at the date of this permit, to the satisfaction of the Responsible Authority. In determining compliance with the standard, the following requirements apply:*

- A) *The sound level from the wind energy facility, when measured outdoors within 10 metres of a*



dwelling at any relevant nominated wind speed, must not exceed the background level (L90) by more than 5dBA or a level of 40dBA L90, whichever is the greater.

B) Compliance at night must be separately assessed with regard to night time data. For these purposes the night is defined as 10.00pm to 7.00am. For sleep protection purposes, a breach of the standard set out at Condition 12a), for 10% of the night, amounts to a breach of the condition.

C) Where special audible characteristics, including tonality, impulsive sound or enhanced amplitude modulation occur, as assessed in accordance with Appendix B of the standard, the noise limit will be modified by applying a penalty of up to + 6 dB L90 in accordance with Section 5.4 of the standard.

This condition does not apply if the operator of the wind energy facility has entered into an agreement with the landowner under which the landowner acknowledges and accepts that the noise standards in this condition may be exceeded at the landowner's dwelling(s). Evidence of this agreement must be provided to the satisfaction of the responsible authority, and must be in a form which runs with the land for the life of the wind energy facility.

Condition 16

Noise (Complaints) Condition 16 relates to the Noise Complaint Evaluation and Response Plan and Condition 12 specifies that the wind farm must comply with the New Zealand Standard 6808:2010 Acoustics - Wind Farm Noise.

Before the use begins, the proponent must prepare a detailed noise complaint evaluation and response plan in consultation with the Department of Sustainability and Environment, the Environment Protection Authority and the Moyne Shire Council. The plan must be submitted to, and approved by, the Responsible Authority. This plan must include the following elements:

- A) A toll-free noise complaint telephone service;*
- B) The erection of a small sign on site advertising of the complaints telephone number*
- C) Minimum recording requirements for noise complaints (that is: date, time, noise description and weather conditions at the receptor)*
- D) A process for determination of whether the noise complaint is a breach of Condition 12 or not;*
- E) A response protocol for confirmed breaches including, but not limited to: i) Determination of the meteorological circumstances at the time of the breach and the operational status of the turbine(s) at that time*
 - ii) Noise optimisation of the relevant wind turbine(s) under the same meteorological circumstances as occurred at the time of the breach;*
 - iii) In the event of a further breach the selective shut down of the relevant wind turbine(s) or turbines in the same meteorological circumstances; and*
 - iv) Where under the same meteorological conditions subsequent confirmed noise breaches occur, the decommissioning of the relevant turbine(s).*
- F) A register of complaints, responses and rectifications which may be inspected by the Responsible Authority; and*
- G) Provision for review of the complaint and evaluation process, including review of the process 12 months after commencement of the operation of the wind energy facility*



3.1 Noise Complaint Response

Where a complaint has been made by a resident, the complaint will be initially acted upon by the Asset Manager

The investigation of the noise complaint will be performed in the following stages:

- The Asset Manager will liaise with the resident making the complaint to determine the source of the complaint. Initial contact will be made within 1 business day to confirm that the complaint has been received and is under investigation.
- The Asset Manager will perform an initial investigation of the potential source of the noise and determine if there is a mechanical equipment fault. This investigation will be undertaken within three business days of the complaint being made. This investigation may be done by listening to the potential noise source or by analysing available data such as vibration measurements. If it is an equipment fault, then a maintenance engineer will be called to rectify the noise source. The maintenance engineer must visit the site within one week of the complaint being made.
- If the Asset Manager is unable to identify the noise source, a visit will then need to be made to the residence of the complainant to identify, in consultation with the resident, whether the source of the noise is coming from the wind farm or another potential source.
- If the Asset Manager, in consultation with the resident, agrees that the noise is coming from the wind farm, preliminary noise measurements will be performed by the Salt Creek Wind Farm Responsible Officer, ideally under comparable weather conditions to those that existed at the time of the complaint. This may require several trips to the site to obtain the wind turbine noise levels during suitable weather conditions.
- The noise level measurements will involve an independent consultant who will oversee the collection of a minimum of six by ten minute LA90 sound pressure level samples and comparing the results with the Noise Limit prescribed in Section 12 (a) of the Permit.
- If the noise has any special audible characteristics i.e. audible tones, impulses or modulation of sound levels (see discussion above in Section 2.2), then a penalty of 6 dB must be added to the measured L90 prior to comparison with the Noise Limit.

If the preliminary noise assessment indicates that the wind turbine level may exceed the Noise Limit in the Permit, then a full noise assessment will be performed by an acoustic consultant to determine the noise level generated by the Wind Turbines. This will be conducted in accordance with the post construction methodology presented in *New Zealand Standard NZS 6808:2010 Acoustics – Wind Farm Noise*.

The assessment will involve the following:

Measurement Locations

- Where practical, the sound level will be measured at the location of the noise complaint. It may be necessary to measure indoors as well as outdoors.

Instrumentation

- The microphone will need to be protected from extraneous wind sound by using a manufacturer's purpose designed windshield.
- The L90 Sound Pressure Levels will need to be recorded using a type 1 noise logger.

Methodology



- The wind speed and noise level should be recorded (over 10 minute samples) under the condition(s) for which a complaint occurred and then any special audible characteristics (as described above) should attract a penalty of 6 dBA to the measured L90.
- If the noise limit exceed that specified in Condition 12(a), then a further investigation such as spectral analysis will need to be performed by the acoustic consultant to determine the possible source of the noise complaint e.g. a particular turbine gear box, and engineering options will need to be implemented to reduce the source of the noise from the Wind Turbines.
- The Asset Manager will review the results and discuss appropriate noise control / mitigation options with the complainant. Appropriate noise mitigation measures to meet the permit requirements may also need to include shutting down an offending wind turbine generator under certain weather conditions and/or at certain times of the day.

As a result of the investigation, the Asset Manager will advise the complainant as to what measures will be taken to rectify the cause of the complaint and to avoid future complaints of this nature.

3.2 Protocol for Confirmed Breaches

A response protocol will be instigated on confirmed breaches of Condition No.12. The response will include but not be limited to:

- Determination of the meteorological conditions at the time of the breach and of the operational condition of the turbines at the time of the complaint;
- Minimization of the noise emission from the relevant wind turbines under the same meteorological circumstances as occurred at the time of the breach;
- In the event of further breaches, noise monitoring to determine potential exceedances and, if required, the selective shut down of relevant wind turbines or a turbine under the same meteorological circumstances; and
- If under the same meteorological conditions, subsequent confirmed noise breaches occur, then decommissioning of the relevant turbine or turbines will need to be seriously considered.

3.3 Evaluation and Response Procedure

- Noise Complaints Evaluation and Response Process

A noise complaints, evaluation and response process will be established so that in the event that a noise complaint is received about the operation of the Salt Creek Wind Farm, an appropriate response can be provided. This section sets out the noise complaints, evaluation and response.

In accordance with AS/NZS 10002:2014 this plan will be readily available and made accessible on:

- The organisations website
- Formal communication as distributed from time to time by the organisation.

Additionally:

- A toll-free telephone number will be made available for residents to contact a message service provider or a representative of the wind farm to allow the voicing of any complaints or concerns.
- A sign has been erected on the wind farm site advising of the complaints telephone number.

Salt Creek Wind Farm Pty Ltd will arrange for all noise complaints to be recorded in a log.

The noise complaints log must be submitted to Moyne Shire Council for review on a quarterly basis.



3.4 Review

A review will be performed of the noise complaints log and procedure twelve months after the wind farm commences operation to ensure that the wind farm is meeting all requirements. The noise complaints procedure will be reviewed annually thereafter during the operation of the wind farm.

3.5 Reporting

If a complaint is found to be due to a non-compliance, then the Asset Manager will keep in contact with the complainant and report back on a timely basis (initially within one week) as to what course of action is being taken to rectify the cause and the predicted time before the source of the complaint is to be rectified.



4.0 Blade Shadow Flicker Complaint Evaluation and Response Plan

Condition 29 of the planning permit requires a complaint, evaluation and response process to deal with shadow flicker. Shadow flicker can occur when wind turbine blades block the sun for short periods of time (less than 1 second) as the blades rotate, causing a strobing effect (EPHC, 2009). Shadow flicker has the potential to impact on the amenity of residents in close vicinity to a wind farm. The likelihood of shadow flicker affecting people depends on factors such as the alignment of the wind turbine and the sun, and their distance from the wind turbine (EPHC, 2009).

The Salt Creek Wind Farm has been designed to minimise the potential for shadow flicker through the use of a minimum setback of 1.2 km from any neighbouring dwelling. A shadow flicker assessment has also been undertaken of the final wind farm layout to ensure that no dwelling will receive more than 30 hours blade shadow flicker per annum.

The purpose of this Shadow Flicker Complaint, Evaluation and Response Process is to address Condition 29 of the Planning Permits issued by Moyne Shire Council. This requires that:

"Before the use commences, details of a complaint, evaluation and response process must be submitted to and approved by the Responsible Authority to assess any breach of this Permit."

Condition 28 of the Planning Permit also states that:

"No existing dwelling, other than a dwelling located on the land in respect of which this permit is issued, will experience over 30 hours blade shadow flicker per annum. For the purposes of assessment regard may be had to the mean cloud cover."

4.1 Guidance

The following guidance is available regarding the evaluation and management of shadow flicker:

- Environment Protection and Heritage Council, 2010, National Wind Farm Development Guidelines -Draft July 2010.
- Department of Environment, Land, Water and Planning, January 2016, Policy and Planning Guidelines for Development of Wind Energy Facilities in Victoria.

4.2 Complaints, Evaluation and Response Process

Complaints Recording

A telephone number will be made available for residents to contact a message service provider or a representative of the wind farm to allow the voicing of any complaints or concerns.

The AM will arrange for all shadow flicker complaints to be recorded in a log.

Investigation

In the event that complaints are received from a single residence totaling 30 hours of impact in relation to shadow flicker, independent modelling of shadow flicker, using as-constructed turbine positions will be carried out to assess compliance with Condition 28 of the planning permit. This need only be carried out once, regardless of the number, timing or source of the complaints (EPHC, 2010).

5.4.2 Response Protocol for Confirmed Breaches



A response protocol will be instigated on confirmed breaches of Condition 28. This will include:

- Notifying the Responsible Authority of the breach; and
- In consultation with the affected landowner, the use of mitigation measures such as planting of vegetation or screening.



5.0 Television and Radio Reception Complaint Evaluation and Response Plan

Condition 20c of the planning permit requires a protocol to rectify complaints associated with radio and television reception. This protocol has been developed to address potential telecommunications interference as it relates to the construction of the proposed Salt Creek Wind Farm. It provides a protocol for responding to and resolving any complaints on telecommunications interference..

The purpose of this Protocol is to address Condition 20 (c) of the Planning Permits issued by Moyne Shire. This requires that:

"A protocol to rectify complaints during the construction period including any detrimental effect caused by mobile electronic equipment temporarily in place during construction, particularly if there is a site camp, on adjacent telecommunications."

Electronic Equipment during Construction

Phone and internet - During construction of the wind farm there will be a site office and there will be a phone link with internet capabilities to the office. The site office will provide connection points for phones, fax and a number of computers. This may be by a fixed cable or be a wireless network depending upon costs and local infrastructure.

Mobile phones - Mobile phones will be used on site. The number of people present on site during construction is considered unlikely to result in any significant detrimental impact to other mobile phone users in the area.

Two-way radio - A two-way radio may be used on site. Two-way radios are regularly used on construction sites in Australia and can operate on a selection of channels in accordance with Australian Communications and Media Authority standards.

5.1 Guidance

The following guidance is available regarding the evaluation and management of television and/or radio reception interference:

- *Environment Protection and Heritage Council, 2010, National Wind Farm Development Guidelines - Draft July 2010.*
- *Department of Environment, Land, Water and Planning, November 2017, Policy and Planning Guidelines for Development of Wind Energy Facilities in Victoria.*
-

5.2 Evaluation and Response Procedure

Where a complaint has been made by a resident, the complaint will be initially acted upon by the AM.

Complaints Recording

In addition to the overarching procedure for reporting and responding to complaints detailed in Section 2.0, details of television and/or radio reception interference complaints to be recorded include a description of:

- how long and at what time(s) of day the complainant experienced the interference on their television and/or radio reception; and
- description of what action will be taken to investigate the cause of the complaint and rectify the cause.



Complaints Investigation

In the event that a compliant(s) are received from local telecommunications user who is experiencing a detrimental effect on their telecommunications equipment, a post-construction survey will be performed by an independent television and radio monitoring specialist to determine if any increase in interference to reception is being experienced as a result of the wind energy facility.

4.2 Protocol and Mitigation Measures

Should any local telecommunications users experience a detrimental effect telecommunications equipment during wind farm construction, the following protocol will be adopted:

- Should Salt Creek Wind Farm Pty Ltd and/or its Contractor receive a complaint in relation to a resident's land line phone, mobile phone or internet reception, the complainant will be advised to contact their service provider in the first instance. The service provider will then determine the cause of the fault. A record of the complaint will be recorded by the Site Manager in the Complaints Register.
- Should a service provider determine that the construction facilities at Salt Creek Wind Farm are the cause of the interference the complaint will be investigated and responded to within 21 days by the Site Manager. The outcome of this investigation will be recorded in the Complaints Register and any mitigation measures will be discussed with the complainant, where appropriate, to determine an appropriate resolution. The Contractor shall then be responsible for the implementation of any identified mitigation measures within a reasonable timeframe, to be determined based on discussions with the complainant.
- Should Salt Creek Wind Farm Pty Ltd and/or its Contractor receive a complaint in relation to two-way radio reception, the complainant will be advised to switch to an alternative frequency as two-way radio channels are unlicensed.

5.3 Protocol for Confirmed Breaches

A response protocol will be instigated if television and radio interference is determined to be as a result of the wind energy facility. This will include implementing measures to mitigate the interference and return the affected reception to pre-construction quality to the satisfaction of the Responsible Authority.



Appendix A: Complaints Handling Register

The Complaints Handling Register forms part of Tilt Renewables Incident Management System. This will be used for the Salt Creek Wind Farm. All complaints are recorded, investigated and actioned and status tracked for each project under Incident Type Community, as outlined below.

Complaint Information Table – Incident Management System

Incident Information	Investigation and Action Management
Reporting Date:	Investigation Details: Type of Investigation, Investigation Status & Report Hyperlink
Reporting Person Details: Employee Type & Name	Investigator Details: Lead Investigator & Employee Type
Reported to:	Causal Factor Listing: Cause Title, Description, Category, Subcategory
Organisation Details: Site/Project, Company, Country, Business Unit, Incident Owner (BU Manager)	Actions: Action Title, Description, Hierarchy of Controls, Owner, Scheduled Completion Date, Extension Date, Completion Date & Progress Notes
Type of Complaint:	Incident Approval: Approved By (BU Line Manager), Approved Date, Notes
Complainant Details: Name, Company, Method of Contact, Email Address, Address, Phone	-
Incident Details: Date, Time, Title, Summary, Exact Location	-
Immediate Action(s): Details, Date, Time, Actioned by	-
Incident Number: (generated upon save)	-

The images overleaf illustrate the interface of the system.

Incident Management System

Incident Information | Investigation & Action Management

Reporting Date	Sep-18	1-Sep-2018		Hazard Observation	Near Miss
Reporting Person Details			Organisation Details		
Employee Type	Others		Site / Project	Salt Creek G	
Name			Company	Vestas	
Reported To	Marita Giles		Country	AU	
			BU	Generation	
			Incident Owner	Mark Telfer	
Incident Details			Incident Types		
Incident Title	Test		Health & Safety	Breaches & Notices	Asset
Incident Summary			Environment	Community	
Exact Location	Gate 2 X Rd		Community		
Complainant Details			Type of Complaint	Flora & Fauna	
Immediate Action(s)	responded to complainant		Name	Mr Smith	
Immediate Action	Date	Sep-18	Company		
	Actioned by	2-Sep-2018	Method of Contact	Phone	
			Email Address	N/A	
			Address		
			Phone	03 xxx xxxx xxxx	
No. of Actions :			No. of Completed Actions :		

Status
 Approval
 Voided
 Incident Number
 49



Appendix B: Key Planning Permit Conditions

Condition No.	Condition Requirements
Condition 7 Environmental Management Plan	<p>Before the development starts, an Environmental Management Plan to the satisfaction of the Responsible Authority must be prepared, in consultation with the Department of Sustainability and Environment, Aboriginal Affairs Victoria and Vic Roads and must be submitted to and approved by the Responsible Authority. When approved, the plan will be endorsed by the Responsible Authority. Environmental Management Plan must include:</p> <p>7j) A program for reporting, including a register of environmental incidents, non-conformances, complaints and corrective actions.</p>
Condition 12 Noise	<p>The operation of the wind energy facility must comply with the New Zealand Standard 6808:2010 Acoustics – Wind Farm Noise (the ‘Standard’), in relation to any occupied dwellings existing on land (other than the site) at the date of this permit, to the satisfaction of the Responsible Authority. In determining compliance with the standard, the following requirements apply:</p> <ul style="list-style-type: none"> A) The sound level from the wind energy facility, when measured outdoors within 10 metres of a dwelling at any relevant nominated wind speed, must not exceed the background level (L90) by more than 5dBA or a level of 40dBA L90, whichever is the greater. B) Compliance at night must be separately assessed with regard to night time data. For these purposes the night is defined as 10.00pm to 7.00am. For sleep protection purposes, a breach of the standard set out at Condition 12a), for 10% of the night, amounts to a breach of the condition. C) Where special audible characteristics, including tonality, impulsive sound or enhanced amplitude modulation occur, as assessed in accordance with Appendix B of the standard, the noise limit will be modified by applying a penalty of up to + 6 dB L90 in accordance with Section 5.4 of the standard. <p>This condition does not apply if the operator of the wind energy facility has entered into an agreement with the landowner under which the landowner acknowledges and accepts that the noise standards in this condition may be exceeded at the landowner’s dwelling(s). Evidence of this agreement must be provided to the satisfaction of the responsible authority, and must be in a form which runs with the land for the life of the wind energy facility.</p>
Condition 16 Noise (Complaints)	<p>Condition 16 relates to the Noise Complaint Evaluation and Response Plan and Condition 12 specifies that the wind farm must comply with the New Zealand Standard 6808:2010 Acoustics - Wind Farm Noise.</p> <p>Before the use begins, the proponent must prepare a detailed noise complaint evaluation and response plan in consultation with the Department of Sustainability and Environment, the Environment Protection Authority and the Moyne Shire Council. The plan must be submitted to, and approved by, the Responsible Authority. This plan must include the following elements:</p> <ul style="list-style-type: none"> A) A toll free noise complaint telephone service; B) The erection of a small sign on site advertising of the complaints telephone number C) Minimum recording requirements for noise complaints (that is: date, time, noise description and weather conditions at the receptor) D) A process for determination of whether the noise complaint is a breach of Condition 12 or not; E) A response protocol for confirmed breaches including, but not limited to: <ul style="list-style-type: none"> i) Determination of the meteorological circumstances at the time of the breach and the operational status of the turbine(s) at that time ii) Noise optimisation of the relevant wind turbine(s) under the same meteorological circumstances as occurred at the time of the breach; iii) In the event of a further breach the selective shut down of the relevant wind turbine(s) or turbines in the same meteorological circumstances; and iv) Where under the same meteorological conditions subsequent confirmed noise breaches occur, the decommissioning of the relevant turbine(s). F) A register of complaints, responses and rectifications which may be inspected by the Responsible Authority; and G) Provision for review of the complaint and evaluation process, including review of the process 12 months after commencement of the operation of the wind energy facility



Condition No.	Condition Requirements
Condition 20	<p>A pre-construction qualitative survey will be carried out to determine television reception strength at selected locations up to 3kms from a wind turbine. The location of such monitoring shall be determined by an independent television reception monitoring specialist appointed by the permit holder. If following commencement of operation of the wind energy facility, a complaint is received regarding the wind energy facility having an adverse impact upon television reception at any dwelling in the area which exists at the date of this document then:</p> <ul style="list-style-type: none">A) Post construction qualitative survey shall be carried out at the location in question.B) If the survey establishes any detrimental increase in interference with the television reception as a result of the wind energy facility, the wind energy facility operator will mitigate the interference and return the affected reception to pre- construction quality at the cost of the wind energy facility operator and to the satisfaction of the Responsible Authority.C) A protocol to rectify complaints during the construction period including any detrimental effect caused by mobile electronic equipment temporarily in place during construction, particularly if there is a site camp, on adjacent telecommunications.
Condition 28 Shadow Flicker	No existing dwelling, other than a dwelling located on the land in respect of which this permit is issued, will experience over 30 hours blade shadow flicker per annum. For the purposes of assessment regard may be had to the mean cloud cover.
Condition 29 Shadow Flicker	Before the use commences, details of a complaint, evaluation and response process must be submitted to and approved by the Responsible Authority to assess any breach of this Permit.