DUNDONNELL WIND FARM

Complaints Management Plan

August 2018

PLANNING AND ENVIRONMENT ACT 1987
PLANNING SCHEME MOYNE
PERMIT NO. 2015/23858
ENDORSED PLAN

SIGNED S. Menzies FOR
MINISTER FOR PLANNING
DATE: 16/10/18

ENDORSED TO COMPLY
WITH CONDITION
16, 17 + 19
OF PLANNING PERMIT
2015/23858

tilt renewables

Dundonnell Wind Farm

APPROVED FOR THE MINISTER FOR PLANNING

SHEET 2 OF 23

Document Title: Complaints Management Plan
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Date: June 2018

Document History and Status

Revision	Date	Description	By	Review	Approved
V1	February 2018	Draft Complaints Management Plan (VREAS submission)	Cara Layton	Andrew Blizzard	Clayton Delmarter
V2	June 2018	Final for document for endorsement	Cara Layton	-	-
V3	August 2018	Updated to respond to DELWP request for three tier model of escalation	Cara Layton	Andrew Blizzard	Clayton Delmarter

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Contents

1.0 Introduction

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

Tilt Renewables (including Dundonnell 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 specific Complaints Handling Procedure which outlines how it will receive and handle operational complaints[1]. All reporting, monitoring and evaluation associated with complaints management for the Dundonnell 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. 2015/23858 (the Planning Permit).

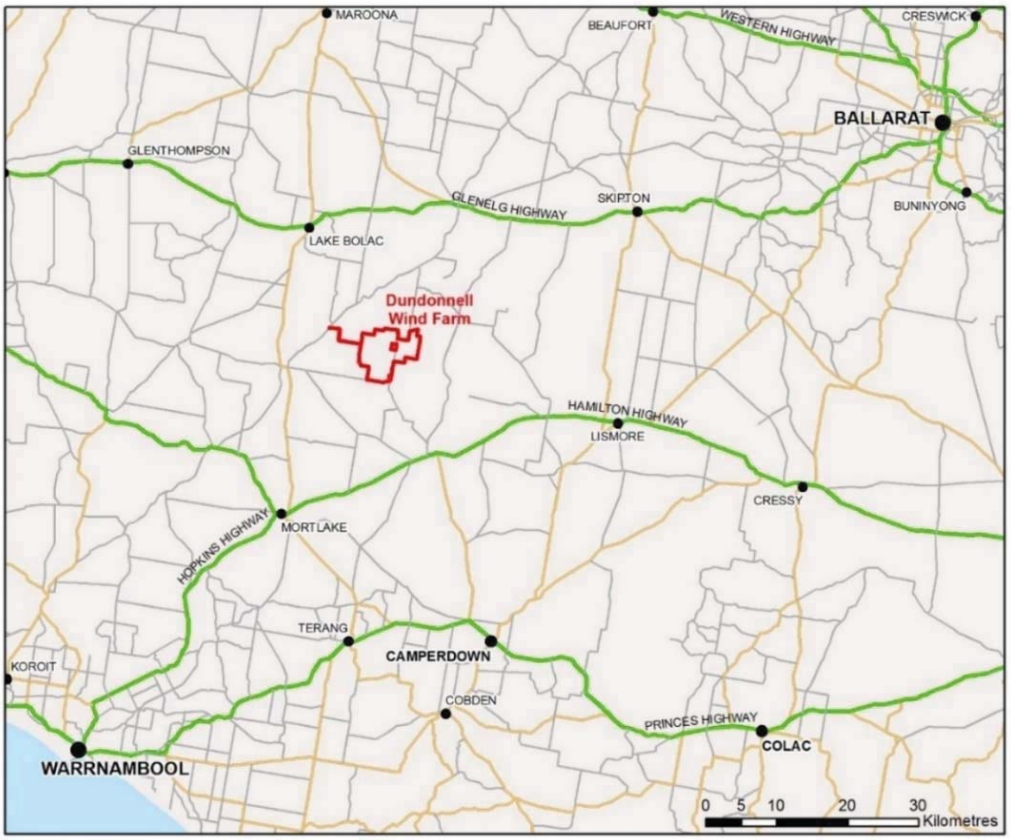


Figure 1: Site Location

[1]This 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.

1.1 The Project

Dundonnell Wind Farm is located in western Victoria, approximately 23km north east of Mortlake and, approximately 225km west of Melbourne. It is entirely within the Shire of Moyne.

The wind energy facility is located on 11 farming properties, with 12 host landholders. Most dwellings within 2km of the permitted turbine locations (including four host landowner dwellings and three of four neighbour dwellings)[2] participate in the project.

The proposed wind energy facility includes 80 turbines, with a blade tip height up to 189m, and an installed capacity of 336MW.

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 16, Noise Complaints Evaluation Plan;
- Condition 17, Noise Complaint Response Plan;
- Condition 19 and 20, Blade Shadow Flicker Complaints Evaluation and Response Plan; and
- Condition 22, Television and Radio Reception Interference[3]

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	- 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	- 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	- Conduct of parties, that make clear the behaviour expected of both its staff and complainants

[2] Additionally, there are four dwellings under specific commercial arrangements, either owned by the Proponent or under option to be purchased by the Proponent.

[3] Whilst not specifically required by the Planning Permit, this plan has been prepared to address the reporting and evaluation of complaints received regarding the wind energy facility associated with adverse effect to television or radio reception.

Principles	
	- 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	- 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

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 Dundonnell Wind Farm.

In accordance with AS/NZS 10002:2014, the Proponent will publish a copy of this plan on the 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 details[4]:

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

Alternatively, complaints can be made using the Dundonnell Wind Farm contact details[5]:

- Email: dundonnellwindfarm@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
Project Steering Committee	Tilt Renewables	Keep informed
Community and Media Relations	Tilt Renewables	May take a role in liaison with complainant
O&M Site Manager	O&M	May take a role in liaison with complainant
Construction Site Manager	EPC Contractor	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	May take a role in liaison with complainant May take a role in liaison with Responsible Authority, or any other relevant regulatory authorities
Development/Project Manager – Renewable Development (RD)	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

[4] These details are available here: www.tiltrenewables.com/contact/

[5] These details are available here: www.tiltrenewables.com/assets-and-projects/Dundonnell-Wind-Farm/

Title	Organisation	Role
Manager Engineering & Projects - Renewable Development	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 RD/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

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

Complaints Recording

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

- All complaints received must be recorded in the Tilt Renewables' Incident Management System (Complaints Handling Register), see Appendix A for further details. The appropriate Business Unit Manager will have responsibility for ensuring that the register is maintained and located in a central location accessible to all relevant personnel.
- The contact details of the complainant should include:
  - Name;
  - Address;
  - Telephone numbers (home, work and mobile); and
  - Email Address
- Details of the complaint to be recorded should include:
  - Dundonnell Wind Farm allocated dwelling no. (see Appendix B) (if relevant);
  - why the complaint is being made / details;
  - when the complaint was first made (time and date);
  - method of contact;
  - who received the complaint;
  - complaint handling owner;
  - any particular personnel the complaint s about (if relevant);
  - what action the complainant would like taken to see the matter put right;
  - date of response and immediate actions;
  - allocated complaints number shall be to each complaint; and
  - attach any copies of correspondence relating to the complaint.
- All complainants will be notified within 24 hours of receipt of a complaint if the complaint is not made verbally.

- All complainants shall receive acknowledgement in writing or via email of the complaint with a reference number and details of how the Proponent proposes to handle the complaint; and
- All complaints are to be acknowledged within two business days and to discuss next steps in handling the complaint, including provision of the contact details of the person that will be handling 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.
- All complaints are to be investigated and responded to within 7 days. If more time is needed, the complainant will be notified before the end of this period and provided an update of expected timeframes;
- 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 RD/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.

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 (RD/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 RD/AM and provide full details of the complaint, including any preliminary investigations or correspondence with the complainant.
- The RD/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 RD/AM and the complainant will be advised of their rights to pursue to the matter further.

2.4 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.

2.5 Review

A review will be performed of the Complaints Handling Register 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.

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 Dundonnell Wind Farm. Specifically, it addressed the requirements of the following conditions of the Planning Permit:

Condition 16

Before the wind energy facility starts operating, a noise complaints evaluation plan must be prepared to the satisfaction of the responsible authority capable of demonstrating whether a complaint can be attributed to a breach of the relevant performance requirement in condition 11. The plan must be prepared in accordance with the following requirements:

a. *unless compliance with the relevant performance requirements in condition 11 has been demonstrated at the complainant's property within the previous twelve months, set out the process for evaluating the complaint including circumstances in which noise monitoring must be undertaken at that property using the same methodology as described in the noise compliance testing plan.*

b. *if a potential non-compliance with the relevant performance requirement in condition 11 is detected, an assessment report must be prepared by a suitably qualified and experienced independent acoustic engineer to:*

   i. *identify the weather or operational conditions associated with the complaint;*

   ii. *analyse the uncertainty and confidence levels in the monitoring, and the steps taken to reduce uncertainty;*

   iii. *target assessment to identify the cause and remediation actions; and*

   iv. *submit a remediation plan to the satisfaction of the responsible authority outlining the investigation process, complainant communications, actions undertaken and timelines to resolve the potential non-compliance.*

Condition 17

Before the first turbine is commissioned, the permit holder must prepare a noise complaint response plan to the satisfaction of the responsible authority.

The plan must include:

a. *a process of investigation to resolve a complaint;*

b. *a requirement that all complaints will be recorded in an incidents register;*

c. *how contact details will be communicated to the public;*

d. *a toll free telephone number and email contact for complaints and queries;*

e. *a table outlining complaint information to be recorded for each complaint received, including:*

   i. *the complainant's name;*

   ii. *any applicable property reference number if connected to a background testing location;*

   iii. *the complainant's address;*

   iv. *a receipt number for each complaint which is to be communicated to the complainant;*

   v. *the time, prevailing weather conditions and description of the complainant's concerns including the potential incidence of special audible characteristics; and*

vi. the processes of investigation to resolve the complaint.

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. The register and complaints response process shall continue for the duration of the operation of the wind energy facility and must be made available to the responsible authority on request. The owner of the wind energy facility must implement and comply with the noise complaint response plan for the duration of the operation of the wind energy facility.

Conditions 11 and 12 set out the Noise Limits for the Dundonnell Wind Farm. Additionally, Conditions 14 and 15 require the preparation of a Noise Compliance Testing Plan and implementation of a subsequent post-construction noise assessment.

An extract of Condition 11, 12, 14, 15, 16, and 17 is contained in Appendix C.

A pre-construction noise assessment (in accordance with Condition 13) has been undertaken of the final turbine layout to ensure compliance with the Planning Permit.

3.1 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 Electotechnical 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.*

3.2 Evaluation and Response Procedure

Where a complaint has been made by a resident, the complaint will be initially acted upon by the responsible Business Unit Manager (RD/AM).

Complaints Recording

In addition to the overarching procedure for reporting and responding to complaints detailed in Section 2.0, details of noise complaints to be recorded include a description of.

- the noise causing the annoyance;
- how long and at what time(s) of day the noise has been impacting on the residents' acoustic amenity;
- the weather conditions in the area at the time of the complaint;
- location of the receptor at the time of the complaint;
- what action will be taken to investigate the cause of the complaint and rectify the cause; and
- what action will be taken to avoid future complaints of this nature.

Complaints Investigation

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

- The RD/AM, or other appropriate person, will liaise with the complainant 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 RD/AM, or other appropriate person, 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 the source of the complaint is deemed to be 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 RD/AM, or other appropriate person, is unable to identify the source from the description given by the complainant, a visit will then need to be made to the residence to identify, in consultation with the resident, whether the source of the noise is coming from the wind energy facility or another potential source.
- If in consultation with the resident it is agreed that the noise is coming from the wind farm, the RD/AM will organize preliminary noise measurements to be performed by an external consultant. These measurements should ideally be made 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 assessments will be conducted in accordance with the relevant standards.

If the preliminary noise assessment indicates that the wind energy facility noise level may exceed the Noise Limit as specified in the Planning 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 methodology set out in the Noise Compliance Test Plan endorsed under Condition 14 of the Planning Permit.

3.3 Protocol for Confirmed Breaches

A response protocol will be instigated on confirmed breaches of Conditions 11 and 12 of the Planning Permit. The response will include the preparation of an assessment report by a suitably qualified and experienced independent acoustic engineer. It will:

- identify the weather or operational conditions associated with the complaint;
- analyse the uncertainty and confidence levels in the monitoring, and the steps taken to reduce uncertainty;
- target assessment to identify the cause and remediation actions; and
- submit a remediation plan to the satisfaction of the responsible authority outlining the investigation process, complainant communications, actions undertaken and timelines to resolve the potential non-compliance.

4.0 Blade Shadow Flicker Complaint 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 blade shadow flicker complaint is received about the operation of the Dundonnell Wind Farm. Specifically, it addresses the requirements of the following conditions of the Planning Permit:

Condition 19

Before the first turbine is commissioned, the operator of the wind energy facility must prepare a detailed shadow flicker complaint evaluation and response plan, to the satisfaction of the responsible authority.

The plan must include the following elements:

a. a toll free complaint telephone service;

b. a sign on site advising of the complaints telephone number;

c. a measure setting out the circumstances in which a complaint made to either the operator of the wind energy facility or the responsible authority triggers a requirement for an investigation; and

d. *procedures for assessing any alleged non-compliance with condition 19*.

Condition 20

The operator of the wind energy facility must implement and comply with the approved shadow flicker complaint evaluation and response plan to the satisfaction of the responsible authority."

Furthermore, Condition 18 of requires that shadow flicker from the wind energy facility *"must not exceed 30 hours per annum at any dwelling existing at 21 April 2015"* (unless *"with a landowner under which the landowner acknowledges and accepts that shadow flicker may exceed 30 hours per annum at the landowner's dwelling*").).

An extract of Condition 18, 19 and 20 is contained in Appendix C.

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. Shadow flicker has the potential to impact the amenity of residents in close vicinity to a wind energy facility. 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).

A pre-construction shadow flicker assessment has been conducted using the proposed wind energy facility layout to ensure compliance with the Planning Permit.

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, November 2017, Policy and Planning Guidelines for Development of Wind Energy Facilities in Victoria.*

4.2 Evaluation and Response Procedure

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

Complaints Recording

In addition to the overarching procedure for reporting and responding to complaints detailed in Section 2.0, details of shadow flicker complaints to be recorded include a description of:

- the shadow flicker causing annoyance;
- how long and at what time(s) of day the shadow flicker has been impacting on the residents' amenity;
- weather conditions when shadow flicker causes annoyance;
- description of what action will be taken to investigate the cause of the complaint and rectify the cause; and
- description of what action will be taken to avoid future complaints of this nature.

Complaints Investigation

In the event that a compliant(s) are received from a resident with concerns that their dwelling is experiencing shadow flicker totaling more than 30 hours per annum, independent modelling, using as-constructed turbine positions will be carried out to assess compliance with Condition 18 of the Planning Permit. This need only be carried out once, regardless of the number, timing or source of the complaints (EPHC, 2010).

4.3 Protocol for Confirmed Breaches

A response protocol will be instigated on confirmed breaches of Condition 18 of the Planning Permit. 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

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 television and/or radio reception interference complaint is received in relation to the operation of the Dundonnell Wind Farm.

Condition 22 requires that following the commencement of the operation of the wind energy facility, if "*a complaint is received regarding the wind energy facility having an adverse effect on television or radio reception at any dwelling within 5km* [which existed at 21 April 2015] *of the turbines*", that "*a post construction survey must be carried out at the dwelling*".

Condition 23 requires that "*if the post-construction survey establishes any increase in interference to reception as a result of the wind energy facility, the operator of the wind energy facility must undertaken measures to mitigate the interference and return the affected reception to pre-construction quality, to the satisfaction of the Responsible Authority*".

A pre-construction survey (in accordance with Condition 21) was completed in June 2018, to determine television and radio reception strength in the area (within 5km of turbines closest to the site boundary in all directions). Extracts of Condition 21, 22 and 23 are contained in Appendix B.

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 RD/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.

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.

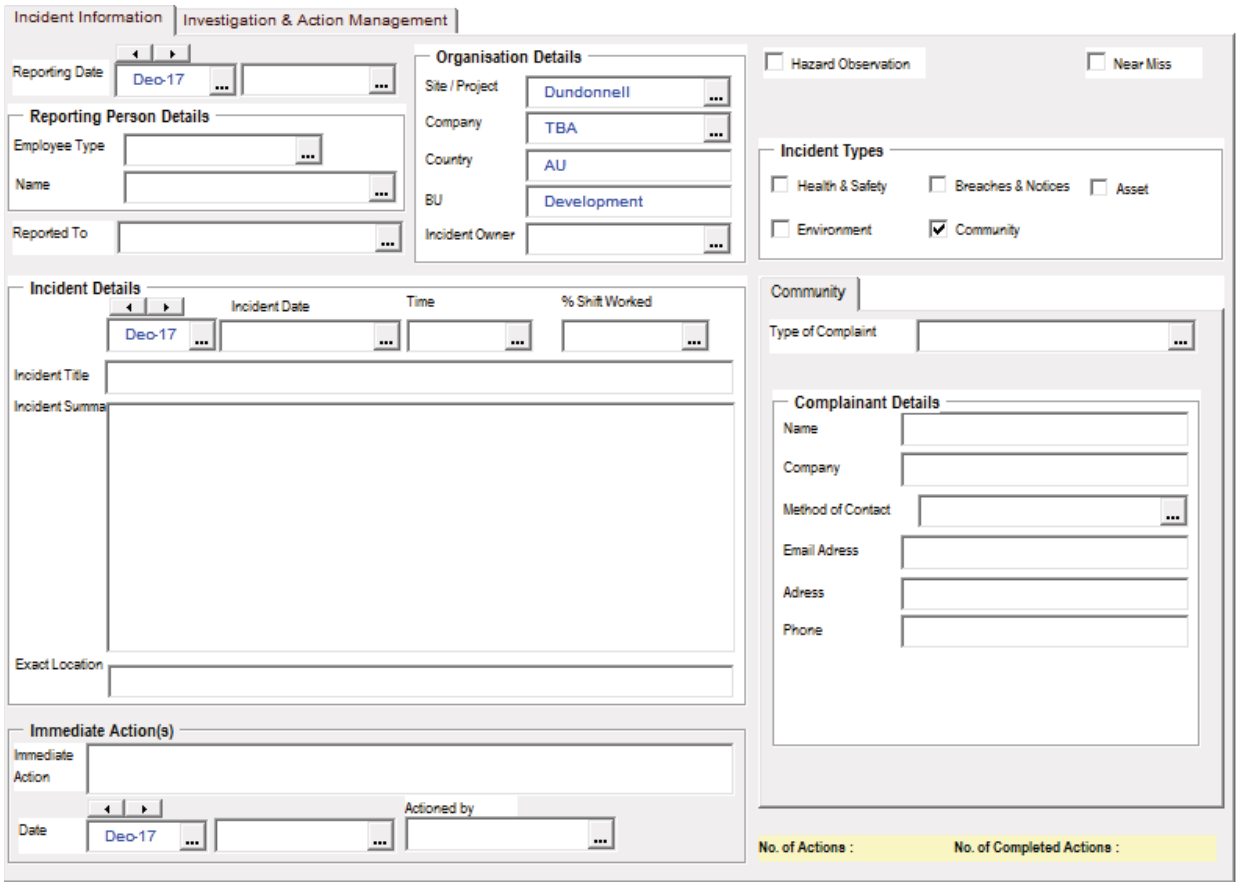
Appendix A: Complaint Handling Register

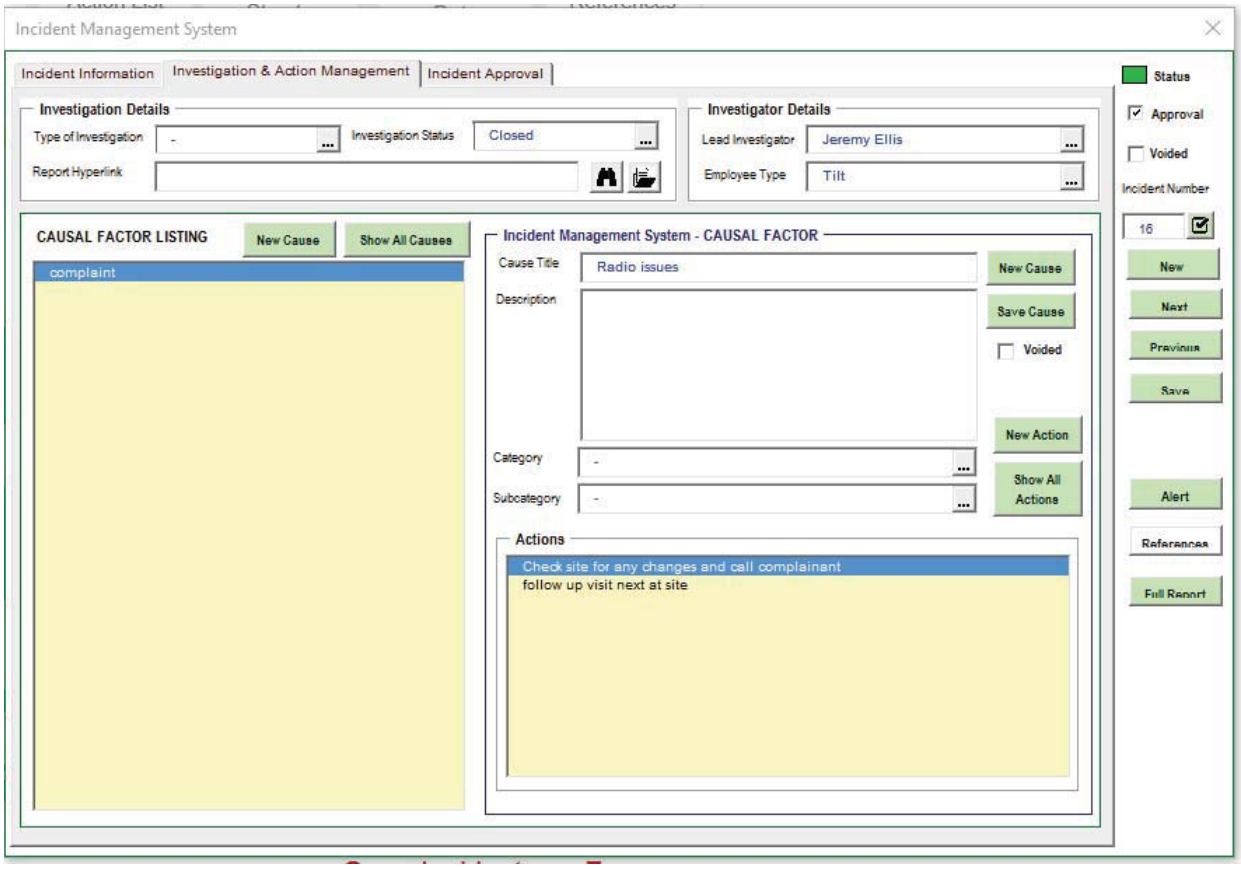
The Complaints Handling Register forms part of Tilt Renewables Incident Management System. This will be used for the Dundonnell Wind Farm. All complaints are recorded, investigated and actioned and status tracked for each project under Incident Type Community, as outlined below.

Complaint Information Table – Incident Management System

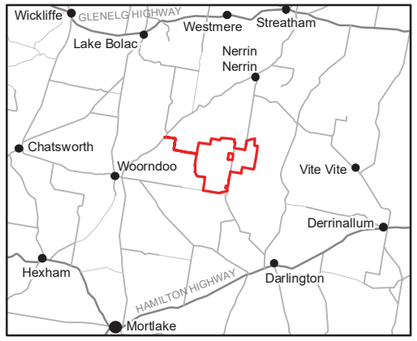
Incident Information	Investigation and Action Management
Reporting Date:	Investigation Details: Type of Investigation, Investigation Status & Report Hyperlink
Reporting Person Details: Employee Type & Name	Investigator Details: Lead Investigator & Employee Type
Reported to:	Causal Factor Listing: Cause 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 Information
Investigation & Action Management
Reporting Date
Dec-17
Reporting Person Details
Employee Type
Name
Reported To
Organisation Details
Site / Project
Dundonnell
Company
TBA
Country
AU
BU
Development
Incident Owner
Hazard Observation
Near Miss
Incident Types
Health & Safety
Breaches & Notices
Asset
Environment
Community
Incident Details
Incident Date
Time
% Shift Worked
Dec-17
Incident Title
Incident Summa
Exact Location
Immediate Action(s)
Immediate Action
Date
Dec-17
Actioned by
Community
Type of Complaint
Complainant Details
Name
Company
Method of Contact
Email Adress
Adress
Phone
No. of Actions :
No. of Completed Actions :


Incident Management System
Incident Information
Investigation & Action Management
Incident Approval
Investigation Details
Type of Investigation
Investigation Status
Closed
Report Hyperlink
Investigator Details
Lead Investigator
Jeremy Ellis
Employee Type
Tilt
Status
Approval
Voided
Incident Number
16
New
Next
Previous
Save
Alert
References
Full Report
CAUSAL FACTOR LISTING
New Cause
Show All Causes
complaint
Incident Management System - CAUSAL FACTOR
Cause Title
Radio issues
Description
New Cause
Save Cause
Voided
New Action
Show All Actions
Category
Subcategory
Actions
Check site for any changes and call complainant
follow up visit next at site

Appendix B: Dwelling Identification No's



Wind Farm Layout

- Permanent Met Masts
- 80 Turbine Layout (19/03/2018)
- Site Boundary
- Access Tracks
- Underground Cabling
- Transmission Line

Existing Features

- Reserve
- Property Boundary

Dwellings (as at 21 April 2015)

- Participating Host Landowner
- Participating Neighbour
- Specific Arrangement
- Neighbour

APPROVED FOR THE MINISTER FOR PLANNING

SHEET 20 OF 23

Date: 22/06/2018
Version: A

Data Sources: Site Infrastructure file, Zenviron 20180608_80WTG_LAYOUT.DWG
Imagery: Google Earth Pro (Image copyright 2018 CNES /Airbus)
Base data: VicMap (Copyright © The State of Victoria, Department of Environment, Land, Water & Planning 2017)

Scale: 1:75,000 at A3
GDA 1994 MGA Zone 54

N

0 1 2 3 Kilometres

Document Path: C:\GIS\Development_Sites\VIC\Dundonnell\Maps\working\DDWF_070_Dwellings2015_A3L.mxd

Dundonnell Wind Farm

Dwellings Existing at 21st April 2015

renewables

Appendix C: Key Planning Permit Conditions

Condition No.	Condition Requirements
Condition 11 Noise (Performance Requirement)	Subject to condition 12, the operation of the wind energy facility must not result in wind farm sound levels that exceed the relevant base noise limit described below when measured in accordance with New Zealand Standard 6808:2010, Acoustics- Wind Farm Noise (the Standard): a. 40dB LA90(10 min) at 'noise sensitive locations' (as defined in the Standard); or b. Any higher base noise limit that the wind farm operator and dwelling owner agree applies to a particular dwelling. This agreement must be in a form that runs with the land for the life of the wind energy facility. Where the background sound level plus 5dB is greater than the relevant base noise limit, the noise limit will be the background sound level LA90 (10 min) plus 5dB.
Condition 12 Noise (Performance Requirement)	"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 LA90 in accordance with Section 5.4 of the Standard."
Condition 14 Noise (Post Construction Assessment)	Before the wind energy facility starts operating, a noise compliance testing plan shall be prepared by a suitably qualified and experienced independent acoustic engineer which sets out the methodology used to demonstrate compliance with the relevant noise limit specified in condition 11. The noise compliance testing plan must be submitted to and be to the satisfaction of the responsible authority and must also: a. demonstrate that noise assessment positions have been located according to the Standard, and show the location of the noise assessment positions on a map. Alternative noise assessment positions should also be included in case a noise assessment position on private land become inaccessible. b. require noise monitoring in accordance with the Standard for the purpose of preparing the compliance reports required by this condition. c. if the wind energy facility is developed in stages, require a noise compliance investigation to be carried out and reported to the responsible authority by no later than six months after completion of each stage of the wind energy facility. d. require a post-construction noise compliance investigation to be carried out and reported to the responsible authority within 6 months from the commissioning of the wind energy facility, and then repeated 12 months later. e. in the event of non-compliance with the Standard include a noise non-compliance action plan which shall be prepared and implemented to the satisfaction of the responsible authority including actions to make the wind energy facility compliant. f. include a report from an environmental auditor accredited under the Environment Protection Act 1970 with their opinion on the methodology and results contained in the noise compliance testing plan.
Condition 15 Noise (Post Construction Assessment)	The noise compliance testing plan must be carried out to the satisfaction of the responsible authority and the plan and all results made publicly available on the project website.
Condition 16 Noise (Noise complaints evaluation)	Before the wind energy facility starts operating, a noise complaints evaluation plan must be prepared to the satisfaction of the responsible authority capable of demonstrating whether a complaint can be attributed to a breach of the relevant performance requirement in condition 11. The plan must be prepared in accordance with the following requirements: a. unless compliance with the relevant performance requirements in condition 11has been demonstrated at the complainant's property within the previous twelve months, set out the process for evaluating the complaint including circumstances in which noise monitoring must be undertaken at that property using the same methodology as described in the noise compliance testing plan. b. if a potential non-compliance with the relevant performance requirement in condition 11 is detected, an assessment report must be prepared by a suitably qualified and experienced

Condition No.	Condition Requirements
	independent acoustic engineer to: i. identify the weather or operational conditions associated with the complaint; ii. analyse the uncertainty and confidence levels in the monitoring, and the steps taken to reduce uncertainty; iii. target assessment to identify the cause and remediation actions; and iv. submit a remediation plan to the satisfaction of the responsible authority outlining the investigation process, complainant communications, actions undertaken and timelines to resolve the potential non-compliance.
Condition 17 Noise (Noise complaint response plan)	Before the first turbine is commissioned, the permit holder must prepare a noise complaint response plan to the satisfaction of the responsible authority. The plan must include: a. a process of investigation to resolve a complaint; b. a requirement that all complaints will be recorded in an incidents register; c. how contact details will be communicated to the public; d. a toll free telephone number and email contact for complaints and queries; e. a table outlining complaint information to be recorded for each complaint received, including: i. the complainant's name; ii. any applicable property reference number if connected to a background testing location; iii. the complainant's address; iv. a receipt number for each complaint which is to be communicated to the complainant; v. the time, prevailing weather conditions and description of the complainant's concerns including the potential incidence of special audible characteristics; and vi. the processes of investigation to resolve the complaint. 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. The register and complaints response process shall continue for the duration of the operation of the wind energy facility and must be made available to the responsible authority on request. The owner of the wind energy facility must implement and comply with the noise complaint response plan for the duration of the operation of the wind energy facility.
Condition 18 Shadow Flicker Performance Requirement)	Shadow flicker from the wind energy facility must not exceed 30 hours per annum at any dwelling existing at 21April 2015. This condition does not apply if the operator of the wind energy facility has entered into an agreement with a landowner under which the landowner acknowledges and accepts that shadow flicker may exceed 30 hours per annum at the landowner's dwelling. Evidence of the agreement must be provided to the satisfaction of the responsible authority, and must be in a form that runs with the land for the life of the wind energy facility.
Condition 19 Blade Shadow Flicker (Complaint evaluation and response plan)	Before the first turbine is commissioned, the operator of the wind energy facility must prepare a detailed shadow flicker complaint evaluation and response plan, to the satisfaction of the responsible authority. The plan must include the following elements: a. a toll free complaint telephone service; b. a sign on site advising of the complaints telephone number; c. a measure setting out the circumstances in which a complaint made to either the operator of the wind energy facility or the responsible authority triggers a requirement for an investigation; and d. procedures for assessing any alleged non-compliance with condition 19.
Condition 20 Blade Shadow Flicker (Complaint evaluation and response plan)	The operator of the wind energy facility must implement and comply with the approved shadow flicker complaint evaluation and response plan to the satisfaction of the responsible authority."
Condition 21 Television and Radio Reception Interference	Before the commencement of construction of the wind energy facility, a pre-construction survey must be carried out to determine television and radio reception strength in the area within 5 km of turbines closest to the site boundary in all directions and in which dwellings were located as at 21April 2015 to the satisfaction of the responsible authority.

Condition No.	Condition Requirements
	The pre-construction survey must include testing at selected locations to enable the average television and radio reception strength in the area within 5 km of the turbines to be determined. The specific locations of testing will be determined by an independent television and radio monitoring specialist, to the satisfaction of the responsible authority.
Condition 22 Television and Radio Reception Interference	If, following commencement of the operation of the wind energy facility, a complaint is received regarding the wind energy facility having an adverse effect on television or radio reception at any dwelling within 5 km of the turbines which existed at 21April 2015, a post-construction survey must be carried out at the dwelling.
Condition 23 Television and Radio Reception Interference	If the post-construction survey establishes any increase in interference to reception as a result of the wind energy facility, the operator of the wind energy facility must undertake measures to mitigate the interference and return the affected reception to pre-construction quality to the satisfaction of the responsible authority.