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To: Southerly Ten
Subject: New submission from EIS Submission
Attachments: Wellington-Shire-Council_SoTS-Offshore-Wind_Preliminary-Submission.pdf

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Wellington Shire Council

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8 July 2026

Via Email: <https://engage.vic.gov.au/sots> & <https://southerlyten.com.au/project/star-of-the-south/environmental-assessment/eis-submissions-portal/>

Dear Sir/Madam,

**WELLINGTON SHIRE COUNCIL - SUBMISSION TO THE STAR OF THE SOUTH
OFFSHORE WIND FARM ENVIRONMENTAL EFFECTS STATEMENT AND
ENVIRONMENTAL IMPACT STATEMENT**

Thank you for the opportunity for Wellington Shire Council (Council) to lodge a submission to the Victoria 'Environmental Effects Statement' (EES) and Commonwealth 'Environmental Impact Statement' (EIS) for the Star of the South Offshore Wind Farm (SoTS) proposal.

The adopted Council Plan 2025 – 2029 contains clear strategic objectives for economic growth and preparing for sustainable living and climate resilience, and as such aspires to achieve, *'an economy that enables sustainable growth, and enhances the social environment, lifestyle and unique characteristics of our communities'*, through *'collaboration with industry and government partners in attracting new investment to advance renewable energy solutions'*.

The SoTS proposal will support Victoria's transition to achieving a net zero emission target, expanding renewable energy capacity, supporting decarbonisation, creating jobs, and supplying affordable, reliable electricity to Victorian consumers.

Whilst Council is supportive of renewable energy investment in the Wellington Shire and the benefits of the associated investment, this position is strongly predicated on the basis that the views and concerns of the local community, and the potential impacts – particularly on those residents in close proximity to the proposal works and service provision are afforded a high level of consideration in the assessment and decision-making processes.

A meaningful two-way dialogue with the community is a crucial component of the planning process if a well-balanced, transparent, and fully informed decision is to be reached and the impacts of development are to be minimised.

In its assessment of the relevant technical reports supporting both the EES and EIS, Council has identified several matters that it believes require further careful consideration and where necessary, should be appropriately managed through the imposition of clear, concise, and relevant statutory mechanisms or conditions. This will ensure that any unnecessary impacts on the community and the environment are avoided, should the proposal be approved. In the interests of the local community, the

environment and Council, the following key matters are believed to require further consideration as part of the assessment process:

- Impact to housing rental supply and saturation of short-term rental housing.
- Delivery of local procurement of goods and services.
- Local-scale impact to businesses and lack of clear compensation measures and process.
- Land use controls within the proposed transmission line easement.

Council acknowledges that the onshore transmission line has been reduced in length and scope from approximately 90 km to approximately 30 km. The alignment assessed in the EES is significantly shorter than the original alignment referred under the *Environmental Effects Act 1978*.

Council also notes that the reduction in length is a result of the Gippsland Offshore Wind Transmission 2 GW Project, which will now provide for transmission from Giffard to the Latrobe Valley and a 'connection hub' at Giffard providing a connection point to the National Electricity Market (NEM).

In the interests of clarity, this submission has been arranged by key themes to align with the structure of the Victorian EES, followed by (additional) comments relating to the Commonwealth EIS.

Council's Role

Council would like to extend its appreciation to Southerly Ten for its engagement with Council throughout the EES process. Council has valued the opportunity to participate in the 'Technical Reference Group' and assist in the formulation and drafting of the technical reports and Chapter summaries, which form part of the EES documentation. The process has been comprehensive and inclusive.

The critical role of local government in energy transition is to ensure that the economic and local benefits are tangible, measurable, meaningful and remain in perpetuity for the benefit of local communities and the townships and rural areas.

The implementation phase must recognise that embedding change is an ongoing process that requires continued collaboration and partnership to address unintended consequences and any unmet commitments.

Local government will continue to have a role in the post EES assessment process, to ensure that plans, strategies and mitigation measures are monitored and implemented, and adjusted where necessary to ensure that net community benefit is delivered. As part of the approvals process and consideration of more detailed plans and strategies to be finalised as part of the identified mitigation measures, it is critical that the time and effort expended by local government is welcomed, valued, and afforded careful consideration.

It is essential that the local communities themselves continue to 'have a say' in the directions and decisions to ensure that the fabric and social cohesion within local townships is maintained and enhanced.

For this reason, Council advocates from the outset that there should be a Community Advisory Group (or similar) established as part of the mechanisms adopted to measure

success and transition during construction and operational phases. The group should be administered by the proponent, and the scope should include commitments to provide regular updates on implementation, monitoring and reporting.

1. Environmental Effects Statement

1.1. Victorian Legislative Framework

Specific comments relating to the draft Incorporated Document, proposed as part of the Planning Scheme Amendment to the Wellington Planning Scheme will be addressed in Section 1.10 of this submission (below).

Council has a critical role to play in providing expertise and community perspectives with reference to the range of management plans proposed as (de facto) mitigation measures for a range of social and economic impacts.

There are at least thirty plans which require drafting and monitoring as part of the construction and operational phases of the project. The management plans of particular importance to Council include, but are not limited to the following:

- Traffic Management Plan
- Community Benefit Fund / Program
- Workforce Accommodation Strategy
- Workforce Development Strategy
- Stakeholder Management Plan
- Biosecurity Management Plan
- Site Access Strategy
- Compliance Plan

Council considers that these plans should be developed, approved, monitored, implemented and amended in consultation with Council.

1.2. Onshore Ecology

1.2.1. Koalas

Council understands that the construction footprint of the underground cabling trench is proposed to be located within an area that is home to one of the most genetically diverse and healthiest populations of koalas in Australia. There is no mention of this in Chapter 8 Onshore Ecology. Technical Report G Onshore Ecology section 10.3.1 refers to mitigation measures to protect the Strzelecki Koala (FFM-M006), however this is not reflected in either Chapter 8 Onshore Ecology or Chapter 26 Environmental Management Framework.

Council believes that the protection of koalas should be considered as part of the Chapter 8 discussion and that mitigation measures should be put in place to protect this important (koala) population. Opportunities to support supplementation and conservation of existing koala habitat and corridors would be welcome as part of the Community Benefit program to mitigate loss of koala habitat and connectivity resulting from the proposal.

1.2.2. Biosecurity

Preparation and implementation of a Biosecurity Management Plan (BMP) will be essential to preventing introduction of and minimising the spread of pest plants, pest animals and pathogens in the proposal area. Council would like to affirm its role to be consulted in the preparation of the BMP, especially as it affects Council land.

1.2.3. Rehabilitation and Reinstatement Plan

The Rehabilitation and Reinstatement Plan refers to rehabilitation following completion of construction in roadsides / stream sides with remnant vegetation (FFM-M013). Chapter 26 Environmental Management Framework, Table 26-4 Construction and Environment Management Plan (CEMP) sub-plan, refers to consultation with the Department of Energy, Environment and Climate Action (DEECA) and relevant landowners.

Council should be consulted in relation to any revegetation within Council-managed roadsides (or other Council land) regarding the selection of species, planting program suitability and compliance with Road Management Act requirements and responsibilities.

1.2.4. Native vegetation removal and offsets

Council notes that up to 16.142 hectares of native vegetation patches and 119 large trees may be impacted by works in Victoria, requiring a General Offset in accordance with the *Guidelines for the removal, destruction or lopping of native vegetation* of up to 8.197 General Habitat Units, with a minimum strategic biodiversity score of 0.394 and 119 large trees located within Wellington Shire Council / West Gippsland Catchment Management areas.

The purchase of third-party offsets are proposed to meet the proposal's offset requirements, and the offset strategy (Chapter 8, Section 11) identifies that suitable offsets are available within the local area. Council supports the purchase of offset credits including large trees as close as possible to the proposal area, and which protect significant vegetation types most affected by removal. Technical Report G Onshore Ecology section 16.3 refers to priority being given to offsets located closest to the proposal area, however there is no commitment to this in the Environmental Management Framework or draft Planning Scheme Amendment and Incorporated Document.

1.3. Soil and Waste

Detail surrounding the management of waste streams generated during construction activities will be included within the 'Construction Environmental Management Plan' (CEMP) to ensure that waste is appropriately categorised, stored, handled and disposed of. Council would request a copy of the CEMP to assist in clarifying and understanding the waste management processes which will be implemented to mitigate risks during construction.

Due to the large scale of the proposal, municipal waste disposal facilities are unable to be utilised for waste disposal or processing of recyclable materials without prior approval from Council. Where municipal waste disposal facilities are the preferred option, relevant Council staff should be contacted during development of the CEMP.

1.4. Agriculture and Forestry

Biosecurity is a key concern of landowners, with the potential for the proposed construction and operation to introduce pest plants/animals/pathogens or facilitate their

spread within the proposal area. Council acknowledges that the mitigation measure includes a Biosecurity Management Plan which refers to alignment with best practices.

Council recommends that the Biosecurity Management Plan should include a schedule of pre-construction surveys to characterise the biosecurity threats within the proposal area. This could include:

- Pre-construction surveys to identify source populations of known pest plants/animals/pathogens within the proposal area.
- Risk assessment of the potential to spread/facilitate dispersal of pest plants/animals/pathogens during construction and operation.
- A cross-tenure, risk-based targeted control program to be implemented pre-construction to maximise effectiveness of hygiene protocols during the construction and operation phases.

Chapter 12, Agriculture and Forestry, Section 10 refers to post-construction rehabilitation inspection frequency as annual; this should be based on the appropriate season and frequency based on the high risk weed life cycles.

1.5. Traffic and transport

Council acknowledges that Technical Report X and Chapter 17: Traffic and Transport, includes a reasonable level of detail on the proposed works, however it does not clearly and adequately capture Council's role in the process for review and approval for works on Council-managed roads to ensure compliance with Council's Road Management Plan, maintenance responsibilities and applicable standards.

Council notes the reliance on mitigation measures to be developed post EES assessment through the:

- Traffic Management Plan
- Site Access Strategy
- Road Safety Audits
- Further consultation with relevant road authorities

This means the following key details are deferred and will require consultation with Council for Council-managed roads:

- Final upgrade scope
- Detailed access design
- Construction traffic routing
- Crossing methodology
- Road rehabilitation / asset handback outcomes

Further, it will be important that the below mitigation measures, detailed design and implementation of road infrastructure works are consistent with the outcomes of the Renewable Energy Land and Infrastructure Plan (RELIP).

1.5.1. Intersections and road upgrades

Design for proposed access points, intersections and upgrade requirements to the road network is not final and is subject to further development through the Traffic Management Plan and detailed design stage. Council requests a clear commitment for

the opportunity to review and approve the final scope of upgrades to Council-managed roads.

1.5.2. Road condition and maintenance

The technical report identifies that road condition and maintenance will include:

- Dilapidation surveys (pre- and post-construction)
- Ongoing inspection and maintenance regime
- Trigger-based intervention and response timeframes
- Asset hand-back requirements
- Reference to agreements with road authorities.

However, it is not explicitly stated that works will be undertaken in accordance with Council's Road Management Plan, or that any maintenance beyond Council's normal program will be fully covered by the proponent.

In addition, while asset handback is referenced, the report does not define the required standard, scope or ownership outcomes. It remains unclear whether roads will be reinstated to their original condition or if upgraded sections will be retained.

Council will require clear confirmation that all affected assets will be returned to an agreed condition, with no unintended transfer of upgraded infrastructure or ongoing maintenance liability to Council.

1.5.3. Road crossings / service crossings under Council roads

The lack of information on this matter remains to be a key issue of concern to Council.

Whilst the technical report confirms that road crossings will occur, including trenching and trenchless methods:

- there is no specific acknowledgement of service crossings under Council-controlled roads, and
- no clear statement that design and approvals will be subject to Council review/approval.

Given the number of crossings proposed, this should be explicitly addressed in the supporting technical documents.

1.6. Social impacts

Many of the mitigation measures relating to social impacts are premised upon the preparation of the following documents:

- Workforce Accommodation Strategy
- Workforce Development Strategy
- Preparation of Property Management Plans
- Stakeholder Management Plan
- Traffic Management Plan
- Community Benefit Program/ Fund
- Environmental Management Framework

The timing of the preparation, duration of the life of the documents, degree of collaboration and process for community consultation requires clarification. It will be important that the above mitigation measures are consistent with the outcomes for

housing and community infrastructure from the Renewable Energy Land and Infrastructure Plan (RELIP).

In addition to a requirement to ensure that rental and short-term stay accommodation in the study areas remains affordable and accessible, it is important that it is available for housing and tourism markets. Housing supply is discussed in further detail under a separate heading below.

It is unclear as to the mechanisms and processes to be undertaken to monitor and respond to the proposed 25% upper limit of consumption of rental and short-term accommodation. It is noted that this is included in a 'line item' in the Environmental Management Framework, which requires further discussion and input from Council.

Council recommends that a requirement for the preparation of regular reporting and monitoring of the short-term rental availability in the relevant townships should be required to avoid saturation of the market before it occurs.

The siting of a temporary concrete batching plant (for 7 months) within 500 metres of the Reeves Beach camping ground is a matter of concern. It is unclear from the supporting documents as to how the proposed communication strategy with campground users will be implemented to consider and address this issue.

Reference is made to five concrete batching plants being established during the construction phase. It is unclear whether this figure includes the temporary batching plant at Reeves Beach referred to above. The locations of these plants are unknown and will require further statutory approvals, which will require Environment Protection Authority (EPA) advice, if in proximity to an existing dwelling.

The preparation of Property Management Plans with affected landowners will be essential in ensuring that landowners are able to continue farming and are protected from biosecurity risks. It is critical that the rehabilitation plans 'post-disruption', are managed respectfully and in a timely manner. It is also important that during the 2-year disruption period that there is a customer service and complaints mechanism is established for the duration of construction.

Community Benefit Funding

The *Victorian Electricity Industry Act 2000* establishes the Payment in Lieu of Rates (PiLoR) framework for onshore electricity generators to contribute to payments in lieu of Local Government rates (using a fixed charge and a variable per megawatt charge). The PiLoR framework applies to all onshore electricity generators including wind, battery and solar.

No such arrangements currently exist for offshore wind generation, even though the offshore wind industry will necessitate physical and community infrastructure and services 'onshore' in towns closest to renewable-related operations.

Given the significant scale of offshore wind investment planned in Australia's first declared area for offshore wind in Gippsland, it is critical that the same PiLoR framework be introduced for offshore wind generation. This will ensure that local government can continue to effectively provide critical services and infrastructure to locally impacted communities.

Delivering tangible local benefits is a critical consideration and as such it is necessary to document what this looks like and how it will be measured.

1.6.1. Housing supply – Wellington context

In Wellington Shire there is significant rental shortages due to social, economic and environmental factors. As of 2026, over 38% of Wellington residents live in rental and housing stress meaning they are paying over 30% of their weekly household income on rent or mortgage repayments. These figures exacerbate the closer you get to coastal towns or rural and isolated townships which will be directly affected by the SoTS proposal.

As cited in the Southerly Ten EES Summary report:

“... the study area is lightly populated with limited housing supply and market”.

Furthermore,

“... coastal areas near the project accommodate small settlements and camping areas. These settlements have small permanent dwelling, aging populations and limited to no services. Limited housing supply mixed with any industry transition becomes extremely problematic and potentially has adverse effects on current residents, both directly and indirectly”.

When a local government area is already in housing stress the introduction of a new industry or the disbandment of a current industry can have adverse effects on the community and outlying towns. Local Government is the closest level of government to its community so it is important that Council highlights and advocates the foreseeable issues regarding housing, but also how this will impact the health and wellbeing of residents.

Housing vacancy rates across Wellington Shire have declined over time. **Figures 1 & 2** (below) show the vacancy rates as of April 2026 in Yarram and Sale, respectively. The two towns selected were referenced multiple times in the EES by Southerly Ten. Yarram being closest to the construction area and Sale being the location for the technical staff (onshore management, administration, logistics etc)

Postcode: 3971



0.0% Yarram rental vacancy rate May 2026

(Figure 1: Source: SQM Research)

Postcode: 3850



1.4% Sale rental vacancy rate May 2026

(Figure 2: Source: SQM Research)

1.6.2. Workforce Accommodation Mitigations Framework (The Framework)

As a mitigation strategy, a Workforce Accommodation Strategy (WAS) was developed with a tiered hierarchy of actions for housing workers, depending on need. Southerly Ten was clear that the intent of the WAS and adjoining framework was to **minimise** impacts on the local community, keeping rental and short stay accommodation affordable and accessible so that it is not compromised. Despite much advocacy from Wellington Shire Council the WAS does not currently address these issues.

Southerly Ten has actively engaged with the community on the benefits of offshore wind and the economic benefits it will bring to the region. There has been some consultation with Council around broader issues such as housing, business and tourism, visual impacts and community services.

Over the course of the last 6 months there have been several engagement meetings regarding the *Social Impact Assessment*. In October 2025 Council raised concerns about the WAS and the mitigation strategies proposed by Southerly Ten for the SoTS proposal.

In the WAS, Southerly Ten stated that the latest mitigation strategy is to:

“Develop suitable temporary accommodation options with capacity to accommodate workers not housed via steps 1 to 5, in collaboration with local Councils’ (Appendix B)”.

Wellington Shire Council has firmly supported renewable energy as evidenced in Councils Position Statement, however it was always under the pretence that it was of benefit to the community and in line with the key priorities; *coordinated transmission, economic benefits, community engagement, local ports for construction and operation, training and skills, regional collaboration and information sharing (Council Position statement - Renewable energy)*.

From Councils perspective, having workforce accommodation as the last mitigation strategy deviates from community benefit, and puts the community at risk of being

outpriced in the rental market, increase the risk of tertiary and secondary homelessness among other health and wellbeing risks.

Southerly Ten clearly states in the Social Impact Assessment that:

"The associated influx of people has the potential to place strain on local housing markets and community services".

Given that both the proponent and Council recognise this as an emerging issue, temporary accommodation for construction, operations and maintenance staff should be provided for the duration of these phases of the proposal.

Aside from risks to homelessness and displacement, Council is concerned about the potential negative impacts on tourism. One of the mitigation strategies proposed by the proponent was for the workforce to acquire up to 25% of short-term accommodation in surrounding areas of the SoTS proposal. This is problematic as many coastal towns within the Wellington Shire and surrounding Local Government Areas use short-term accommodation to attract visitors - especially over the summer period. The byproduct of this holiday visitation is money being spent in these coastal towns but also the vibrancy and life that comes with seasonal visitors.

Under Strategy 5 of the Workforce Mitigation Framework in the WAS, Southerly Ten proposes using caravan parks to accommodate SoTS workers, which would reduce the availability of much-needed tourist accommodation.

1.6.3. Workforce Development Strategy

Council notes that the Workforce Development Strategy is yet to be provided. This strategy is of particular importance given the contraction of other industries and the resulting job losses affecting local community members, and it should clearly set out how those workers will be supported to access employment opportunities in the renewable energy sector.

Council also notes that Wellington Shire has an ageing population and recorded a net migration loss of 555 young people in the 2021 Census.

Employment pathways in the renewable energy sector, including apprenticeships, traineeships and related opportunities, may assist in retaining young people and young families within Wellington Shire. Accordingly, a robust Workforce Development Strategy is required to support local talent retention and to maximise employment outcomes for local residents through access to TAFE and tertiary education pathways.

Council is concerned by the statement in the EES Social chapter that:

'Construction and operation of the project will create a substantial amount of employment.... It is expected a large portion of the positions would be filled by workers who do not currently reside within the commuting distance of the work location' (p. 25).

Council is concerned with an outcome in which an external workforce fills these roles while local residents are not provided with the training, skills and experience required to compete for them.

1.6.4. Learning from National and State Context

Renewable energy development is not new to Australia or Victoria, and the transition should draw on lessons from previous industry change. Council considers it important to assess what approaches have delivered positive outcomes, what has not, and which measures best support the communities most directly affected.

Council seeks both qualitative and quantitative evaluation from Southerly Ten to demonstrate the extent to which the proposal will contribute positively to the local community, rather than diminish existing social and economic conditions.

A recent report, *'How Australia's shift to renewable energy can deliver beneficial outcomes for regional housing' (Re-Alliance, November 2025)*, identifies examples from New South Wales, Victoria and Queensland where local councils, communities and renewable energy proponents are working collaboratively to convert temporary workforce accommodation into enduring housing assets.

These examples include refurbished aged care facilities, community-owned rental housing, modular neighbourhoods and upgraded infrastructure, demonstrating that regional communities are capable of delivering practical, long-term solutions that extend beyond the construction phase.

Emerging industries have long formed part of Australia's economic development, including mining, oil and gas, mineral extraction and onshore wind energy. While each has delivered economic benefits, each has also generated social and environmental challenges. There is now an extensive body of case studies, academic literature and qualitative and quantitative research that should inform the assessment of this proposal.

1.6.5. Conclusion – Social Impacts

Council requests that the matters set out below be given further detailed consideration, having regard to best practice, to ensure that:

- Mitigation strategies deliver enduring community benefit over the long term and are not primarily driven by cost minimisation.
- Monitoring of short-term accommodation and housing stock establishes a clear process to ensure that the maximum threshold of 25% occupation of short-term accommodation is not exceeded. The Workforce Accommodation Strategy should also include a clear timeline so that, if additional accommodation is required, sufficient time is available to secure approvals and deliver alternative accommodation solutions.
- Appropriate support is provided for essential infrastructure, including roads, water, sewer and power, to enable councils to facilitate new housing supply in the areas where it is most needed.

Council notes that several key documents are identified as Construction and Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP) 'sub-plans' in Chapter 26 of the Environmental Management Framework. Council would have preferred these documents to be available in draft form as part of the EES and EIS, given their significant implications for the community and their role in shaping stakeholder relationships, partnerships and community confidence. Accordingly, Council requests, or seeks confirmation of, consultation on the following sub-plans:

- Stakeholder Engagement Plan

- Workforce Development Strategy
- Community Benefit Fund

1.7. Business and Tourism

Council's overall assessment of the business and tourism implications of the proposal is positive, recognising the potential for significant regional investment, employment opportunities, supply-chain participation and broader economic confidence associated with the transition to renewable energy. However, these benefits must be delivered in a way that is clearly understood at the local level and carefully balanced against the concerns of coastal communities and businesses most directly affected by construction activity, workforce demand and visual and amenity changes.

Council considers that, with appropriate mitigation and enforceable commitments, the proposal has the capacity to generate a net positive economic outcome for Wellington Shire. To support this outcome, further detail is required on hyper-local tourism and business impacts, particularly for coastal settlements and small businesses where seasonal visitation, nature-based tourism and short-term accommodation form a significant part of the local economy.

Council welcomes the opportunity for the proposal to stimulate longer-term housing, land supply and infrastructure investment within townships such as Yarram and Alberton, particularly where this supports a permanent workforce and strengthens local communities beyond the construction phase.

At the same time, Council remains concerned that unmanaged reliance on temporary worker accommodation, rental housing or short-term tourist accommodation could place pressure on local residents, visitors and existing businesses. Temporary worker accommodation should therefore be carefully planned, monitored and limited to the construction phase, with a clear pathway to longer-term housing outcomes that support Yarram and district.

Council supports the proposition that success will depend on bringing vacant dwellings into the market, encouraging appropriate property investment, and facilitating new housing stock and land supply. These measures should be advanced in a coordinated way so that project-related demand contributes to enduring community benefit rather than short-term market pressure.

The preparation of the *Renewable Energy Land and Infrastructure Plan (RELIP)* by Wellington Shire Council and South Gippsland Shire Council will be critical to ensuring that land, housing and enabling infrastructure are delivered in a timely and coordinated manner.

Council considers that the long-term permanent housing market should be strengthened, not undermined, by the energy transition. The proposal should therefore contribute to a positive legacy of housing choice, workforce retention and township prosperity.

Council also acknowledges the potential for temporary disruption to the Reeves Beach camping ground due to noise and construction activity, including the proposed temporary concrete batching plant. These impacts should be proactively managed through clear communication, monitoring, scheduling that avoids peak tourism pressures where practicable, and the publication of suitable alternative free camping options during peak seasons.

1.7.1. Worker capacity and capability

The Workforce Development Strategy (BTM-M005) should include measures to support the transition of the existing workforce and the active upskilling of the local population so that local residents can participate in the employment opportunities arising from the energy transition. These measures should be monitored and evaluated to understand the opportunities, and the potential impacts to existing industries including worker shortages, to ensure that the economic and workforce benefits are realised within the region.

In turn, this would support population growth across all age cohorts within existing townships and contribute to their long-term prosperity.

1.7.2. Supporting existing businesses through construction

Council recognises the potential for the proposal to generate new economic activity, supply-chain opportunities and additional local expenditure during the construction phase. To maximise these benefits and maintain confidence within the local business community, Council considers that a clear and practical approach should be established to support existing businesses and manage any temporary disruption during construction.

Further detail would assist in demonstrating how the business and tourism benefits of the proposal will be realised locally, particularly for coastal communities and small businesses that rely on seasonal visitation and nature-based tourism.

- A clearer evidence-based conclusion on the likely overall tourism outcome, recognising both potential benefits and potential localised impacts.
- Additional supporting evidence about how worker expenditure, supply-chain activity and visitor interest associated with the proposal may benefit established coastal tourism destinations.
- More detailed consideration of opportunities and impacts for individual businesses and sectors, particularly within small coastal communities with strong seasonal tourism economies.
- A transparent process for identifying, verifying and responding to business impacts, including where impacts extend beyond the construction phase.
- Greater recognition of the role and economic contribution of nature-based tourism, including passive coastal experiences such as whale watching, recreational fishing, boating and beach visitation.
- A clear link between mitigation measures, including the Community Benefit Fund, and the scale, location and nature of local impacts and opportunities.
- Specific planning for peak tourism periods, when local businesses have the greatest opportunity to benefit from visitation and the highest exposure to disruption.

Council considers that further attention to these matters will help ensure the proposal strengthens the tourism sector, supports existing businesses and contributes positively to agricultural productivity and broader regional prosperity.

1.7.3. Local procurement

Chapter 21 Business and Tourism refers to development of a Workforce Development Strategy (BTM-M005), which will include a procurement strategy and indicates a weighting towards Gippsland firms. Council would also welcome a commitment to a hyper-local procurement objective, to identify opportunities for the communities which will be hosting the project or most impacted by the proposal.

1.8. Land use and planning

1.8.1. Proposed Easements, Restrictions and Reserves (Clause 52.02)

The proposed 40-metre easement to be created along the transmission line will potentially restrict landowners use, planting, earthworks and development of any structures.

At page 14, Table 22-4 states:

"There would be some ongoing restrictions to farming land uses within the easement including below ground sub-soil works (for example deep tilling / ripping) and / or above ground structures (dwellings and sheds) and water storage (dams and tanks) and certain crop types that could hinder access to the underground transmission infrastructure. Plantations would also be restricted within the easement. The conditions which restrict the use of land in the easements will be referenced in the Certificate of Title, through the plan of subdivision or a registered easement, using the formal process of the Subdivision Act 1988".

The proposed easement may override uses otherwise permitted within the relevant zone, including uses that would ordinarily be allowed 'as of right'.

This may restrict a range of farming activities on land within the Farming Zone. Accordingly, landowners require greater clarity about how the proposed easement would affect existing zone permissions.

The existing land uses that may no longer be permitted across the 25 affected properties because of the proposed easement and restrictions should be clearly identified.

Council requests a copy of the restrictions to ensure any planning advice provided is accurate and relevant. A Geographic Information Systems mapping layer showing the extent of the easement would also assist Council in informing planning decisions within the locality.

Given the Certification Process required for Registration of Easements of Certificate of Title, Council requests that an arrangement be established, which allows for further discussion and clarification, relating to timing, costs and administrative services. A placement of an Easement over 25 properties will potentially result in an increased workload for the Council planning team.

1.8.2. Future Uses

The following statement is made in Table 22-4, page 15 of Chapter 22 Land Use and Planning report, with reference to Clause 53.02 (Bushfire Planning):

"If a sensitive use (such as accommodation for workers) were to be developed by and in support of the Star of the South at a later date, it would be subject to a separate approvals process which falls outside the scope of the current assessment and proposed Planning Scheme Amendment (PSA)".

It is unclear what this statement refers to or where it would apply.

Council is of the view that the issue relating to accommodation for workers and the associated impacts requires further investigation and resolution.

1.9. Victorian Environmental Management Framework

The draft Incorporated Document requires that the Environmental Management Framework and Alignment Plans to be endorsed by the Minister for Planning before development commences, although these documents may be prepared in stages or by component.

The Incorporated Document also provides that use and development within the Specific Controls Overlay must generally accord with the Environmental Management Framework and Alignment Plans. This will necessitate the implementation of an Environmental Management System and the preparation of a series of Compliance Plans. While Tables 26-4 and 26-6 identify approximately 30 management plans, they do not provide sufficient detail about how consultation with Council will occur or the extent of Council's involvement in their preparation. Council seeks further clarity on these arrangements and requests that they be set out in the Environmental Management Framework.

As previously stated in Section 1.1, Council believes that it should be consulted in the preparation of the plans for construction and operation, as outlined in Chapter 26 - Tables 26-4 and 26-6 (see **Table 1** below).

Table 1. Summary of EES CEMP/OEMP documents for Council consultation

CEMP/OEMP sub-plans and other management documents and strategies	Consultation with Council (* Council not currently included in EMF Tables 26-4 and 26-6)
Stakeholder Engagement Plan including complaints management process	✓*
Traffic Management Plan	✓
Community benefit fund	✓
Workforce Development Strategy	✓
Workforce Accommodation Strategy	✓
Biosecurity Management Plan	✓
Rehabilitation and Reinstatement Plan	✓*
Disposal Plan – spoil	✓*
Heavy vehicle transport route assessment	✓*
Site Access Strategy	✓
Local Procurement Strategy	✓* (missing from the EMF)

Council notes and welcomes the proposed Stakeholder Engagement Plan – Business and Tourism. However, Council is not currently identified as a consultee in the preparation of this plan. To support the best possible outcomes, Council should be expressly included as a consultee in its development.

The Environmental Management Framework also refers to a complaints management system. Council requests that it be consulted in the development of this system.

Council notes that Chapter 21 of the EES refers to a Local Procurement Strategy; however, this strategy is not included in the list of plans and sub-plans to be prepared under Tables 26-4 and 26-6 for construction and operation. Council considers that a Local Procurement Strategy should be prepared, expressly included in Tables 26-4 and

26-6, and developed in consultation with Council. The Local Procurement Strategy should include a commitment to identify hyper-local opportunities for the communities which will be hosting the project or most impacted by the proposal.

1.10. Draft Planning Scheme Amendment and Incorporated Document

We note that there will be a need for a new Planning Scheme Amendment number to be allocated to the draft Planning Scheme Amendment (C129well has been assigned to another Wellington Shire Council project).

Council agrees that the Minister of Planning must be the responsible authority for administration and enforcement of the planning controls proposed under the draft Planning Scheme Amendment on the basis that:

- The proposal is of national, state and regional significance due to the scale and its importance as a potential source of electricity reaching far beyond the boundary of Wellington Shire.
- The Minister of Planning is the responsible authority for matters under Divisions 1, 1A, 2 and 3 of Part 4 of the *Planning and Environment Act 1987*, and endorsement of, approval of or being satisfied with matters required by a permit or the scheme to be endorsed, approved or done to the satisfaction of the responsible authority, in relation to:
 - The use and development of land for an Energy Generation Facility with an installed capacity of 1 megawatt or greater Energy Generation Facility with an installed capacity of 1 megawatt or greater.
 - Utility installation used to:
 - Transmit or distribute electricity.
 - Store electricity if the installed capacity is 1 megawatt or greater.

Council acknowledges that the proposed Amendment would introduce a 'Specific Controls Overlay' (SCO) and an 'Incorporated Document' into the Wellington Planning Scheme for the purposes of enabling the proposal in an effective and efficient manner. The proposal is located within the Gippsland offshore wind declared area and would connect into the proposed VicGrid connection hub.

The Amendment would assist in the delivery of *Victoria's Infrastructure Strategy 2021-2050 (Infrastructure Victoria, 2021)* by enabling the development of infrastructure that facilitates the transition to renewable energy.

The streamlining of planning controls for the proposal would ensure a consistent and coordinated approach, which implements the appropriate management and compliance mechanisms to ensure successful delivery and operation of the Proposal.

The draft Planning Scheme Amendment proposes:

- The introduction and application of a Special Controls Overlay with a new Schedule (SCO3) to land for the onshore works, resulting in no planning permits being required for proposed buildings and works (Clause 45.12) and for use of the land for the purposes of a utility installation.

- The SCO3 includes a new Incorporated Document into the Planning Scheme.
- Amends Clause 72.01 to make the Minister for Planning the Responsible Authority for the administration and enforcement of the Incorporated Document.

Council notes that exempting the Amendment from Sections 17, 18 and 19 of the *Planning and Environment Act 1987* and the *Planning and Environment Regulations 2015* allows for prompt and efficient decision-making in circumstances where the views of stakeholders and the relevant Council are known.

Appendix A Draft Explanatory Report page 13 states:

"Since the amendment proposes to amend the Schedule to Clause 72.01 of the Wellington Planning Scheme to make the Minister for Planning the Responsible Authority for the administration and enforcement of the Incorporated Document, any impact on the resource and administrative costs of the Council is anticipated to be limited and the impact on the Victorian Department of Transport and Planning (DTP) and the Minister for Planning minor."

Notwithstanding the above, Council would suggest that there will be a significant resource implication for the monitoring and implementation of at least 30 Management Plans associated with the proposal.

1.10.1. Draft Incorporated Document

Council acknowledges that the proposed introduction of an 'Incorporated Document' into the Wellington Planning Scheme will exempt the proposal from a number of planning scheme requirements and set out tailored approval and assessment requirements.

The draft Incorporated Document (Clause 6.3) reads as follows:

"In deciding whether to endorse or amend the Alignment Plan or Victorian Environmental Management Framework, the Minister may seek the view of any other relevant authority".

This clause requires additional information and clarity to provide Council with certainty that allows for collaboration and comment in any endorsement/amendment of these documents.

Timeframes

Whilst the Incorporated Document references Expiry Dates of 10 years to commence and 10 years to complete development, there is no reference to the Commission element of the proposal. It is suggested that there should be an additional clause in the time clause to address timing for decommissioning and remediation activities.

Collaboration and Consultation

Drafting and development of the Workforce Accommodation Strategy is not in consultation with Wellington Shire, as shown in Chapter 26, Table 26-7 Measure ID BTM-M006, page 65.

Council would welcome further clarification of the following:

- Additional details relating to the proposed locations of the 5 concrete batching plants and the consultation process proposed with affected landowners and operating duration and conditions.
- Additional details, relating to the proposed controls relating to subdivision within the Incorporated Document. There is no reference to conditions and requirements for subdivision. The materials refer to exemption from the need for a planning permit.
- Greater clarity relating to the permit exemptions for easement creation, easement purpose and Notice of Restrictions.
- Increased conditions within the Incorporated Document, which provide a caveat that the mitigation plans are drafted, prepared, monitored and implemented, '*to the satisfaction of*'. The conditions should apply to all management plans.
- Clarity on the definition of what an 'ancillary building' is considered to be.
- The Incorporated Document makes no reference to Traffic Management Plan, Social Management Plan and a series of plans referred to in multiple technical reports as mitigation measures. These plans should be explicitly stated and measured.
- The requirements of the Country Fire Authority and need for the preparation of a Fire Management Plan.

2. Environmental Impact Statement (Commonwealth)

2.1. Seascape, Landscape and Visual

Council notes that that the proposal will result in moderate or high visual impacts in the following towns:

- Port Albert
- Robertsons Beach
- Manns Beach
- Woodside
- Woodside Beach
- McLoughlin's Beach
- Seaspray

In its assessment of the potential visual intrusion of the turbines, Council understands that the proponent has attempted to mitigate these impacts by:

- Locating the windfarm 10km from shore.
- Selecting a site away from major population centres.
- Reducing the number of turbines.
- Undergrounding onshore transmission cables.

In acknowledging that there will be a visual impact from the towns listed above the report does not clearly articulate how those towns will experience a net community benefit from the proposal.

Council would like to better understand what the net community benefit will be for these towns given the impacts.

Seascape, landscape and visual impacts are a significant issue for community and as such should be afforded significant weight in the assessment and determination of the EIS.

2.2. Business and tourism

While Council supports the transition to renewable energy and recognises the potential regional economic opportunities presented by the project, this support is conditional on the provision of further evidence, stronger mitigation measures, and enforceable commitments to ensure that local communities, particularly coastal townships and tourism operators, are not disproportionately impacted and that any adverse effects are appropriately managed and compensated.

Council notes the following impacts or issues are acknowledged in the EIS assessment:

- Specific coastal communities likely to be affected include Woodside Beach, McLoughlins Beach and Reeves Beach, with flow-on impacts to service towns such as Yarram and Woodside.
- Visitation may decline in coastal locations and that some visitors may choose alternative destinations, particularly where the natural coastal environment is the primary attraction.
- Impacts will not be evenly distributed, with some communities more exposed than others.
- Tourism outcomes are difficult to predict and are dependent on visitor attitudes, providing a more balanced and credible assessment of risk.
- Workforce demand is clearly identified as placing pressure on housing supply, with potential impacts on availability and pricing acknowledged across a range of scenarios.
- Tourism scope includes consideration of marine tourism, recreational fishing and boating, providing a more comprehensive understanding of the visitor economy.

Refer also to commentary in the EES Section 1.7 (above).

2.3. Social Impacts

Refer to commentary in the EES Section 1.6 (above).

2.4. Infrastructure and co-existence with other users

Council notes that the Offshore Wind Farm Area (OWFA) overlaps with registered airspace of two Council-managed aerodromes (as per Table 6-1):

- Yarram Aerodrome - OWFA overlaps the PANS-OPS area
- West Sale Aerodrome (encompassed by RAAF Base East Sale military restricted airspace) - OWFA overlaps restricted airspace

Mitigation measures will include:

- Raising the height of the overlapping civil and Defence LSALT
- A redesign of the PANS-OPS for Yarram Aerodrome
- Consultation with Yarram Aerodrome pre-construction regarding the PANS-OPS approach space.

Council is of the view that all initial and ongoing costs and notifications associated with amending documents, updates to design or procedures and validation flights remain the responsibility of the proponent.

2.5. Onshore Ecology

It's noted that Council is to be consulted regarding Biosecurity Management Plan.

Refer to biosecurity comment in Section 1.2.2 (above).

2.6. Commonwealth Environmental Management Framework

The secondary approvals and preparation of a series of management strategies and plans require additional clarity relating to process, collaboration and coordination of approvals.

Council has a critical role to play in providing expertise and community perspectives with reference to the range of management plans proposed as mitigation measures for a range of social and economic impacts.

Council notes that Chapter 23 Environmental Management Framework (EMF) identifies consultation on a range of Construction and Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP) sub-plans. However, Council considers that there are additional plans also requiring consultation.

A summary of the plans and documents which require Council consultation is provided in **Table 2** (below).

Table 2. Summary of EIS plans and processes for WSC consultation

CEMP sub-plans and other management documents and strategies	Consultation with Council (* Council not clearly specified in EMF Table 23-8)
Alteration to the PANS-OPS surface at Yarram Aerodrome	✓
Communications and Stakeholder Engagement Plan	✓
Biosecurity Management Plan	✓
Rehabilitation and Reinstatement Plan	✓*
Operational Environmental Management Plan	✓*
Decommissioning Environmental Management Plan	✓*
Workforce Accommodation Strategy	✓
Traffic Management Plan	✓*
Community Benefit Fund	✓
Workforce Development Strategy	✓

Council considers that the plans listed in **Table 2** require collaboration with Council during drafting, the approval processes, monitoring phases, implementation and any modifications or changes.

However, there does not appear to be any detail about how this consultation will occur, councils level of involvement or what part of the development of the plans the consultation will occur. Council would welcome further detail about how the consultation process will occur and for this to be reflected in the Environmental Management Framework itself.

3. Concluding remarks

Council supports the energy transition to renewables. It is critically important that economic prosperity is delivered at the local level, for townships in the form of housing and community benefits, for employment and economic growth.

There are a range of mitigation measures proposed in a series of technical reports, which require preparation, drafting, implementation and monitoring for the impacts. These require that Council is part of a collaborative and informed process, to ensure that positive impacts are delivered and any adverse impacts are appropriately mitigated.

The proposed draft Planning Scheme controls propose to transfer the land use planning responsibility to the Victorian State Government, and it is important that Council remains informed and able to collaborate to influence and ensure that community benefit is secured and delivered.

There are elements in the proposed draft Planning Scheme controls that require additional detail 'up front' and transparency for affected landowners.

Council has concerns relating to the impact in the short and long term on housing and land supply for immediate townships such as Yarram, and these impacts must be delivered in a manner which delivers positive growth and prosperity for our townships and local population.

Long term prosperity and economic growth as part of the energy transition is paramount. The cumulative impact of multiple proposals on the local community is significant and can be very overwhelming. Ongoing monitoring of the proposal and community updates will be essential, particularly given the extended construction period. Council urges Southerly Ten to commit to collaboration with concurrent projects where possible, to streamline community awareness of the projects, minimise impacts (particularly during construction) and maximise sustainable community benefits.

The proposed easement restrictions will directly affect 25 property owners.

A Social Management Plan must be developed, prepared and implemented to deliver the Community Benefit Program and Fund, noting that Wellington Shire Council has a critical role in this process.

Temporary housing should not extend into the operational phase. The proposal should support long-term regional prosperity through increased land supply, housing, population growth and economic development.

As the Minister for Planning assumes responsibility for land use and development under the Wellington Planning Scheme, it is critical that Wellington Shire Council remains actively informed during both the implementation, and monitoring components. Notice of any compliance-related matters would also be welcome.

The careful preparation, drafting and implementation of more than 30 management plans identified in the Environmental Management Framework will be crucial to ensuring that associated benefits are realised and that impacts are effectively managed.

Thank you for the opportunity to actively participate in the assessment of both the EES and EIS processes associated with the proposal.

Yours sincerely

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