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Attachments: Star-of-the-South-EIS-submission-29062026.pdf

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Seaspray Wind Farm Strategy Group

Your Details

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28 June 2026

Submission to the Environmental Impact Statement

Star of the South Offshore Wind Project

Seaspray Wind Farm Strategy Group

Seaspray Wind Farm Strategy Group formerly respond to the Star of the South EIS and EES Statement as a precursor to upcoming Auction slated for August and for submission to DCCEEW to advise Minister Bowen and the Victorian Planning Minister for a commercial licence to construct Wind Turbines 10km off the coast of the 90 Mile Beach Coastline and onshore to the Giffard substation

The Seaspray Windfarm Strategy Group (SWSG) is a dedicated subcommittee of the Seaspray Ratepayers Association, formed in mid-2025 in response to widespread community concern about proposed offshore wind developments in the Gippsland Offshore Wind Zone.

The SWSG does not support Offshore Wind Farms constructed 10 km from the coastline, in contrast, the group does support projects which are located more than 25km from the coastline. Developments such as Star of the South will contribute to the cumulative impact of the planned 554 turbines, industrialising the coastline in joining with the Blue Mackerel North project should it go ahead.

The SWSG believes that communities such as Seaspray and The Honeysuckles are being asked to shoulder all the risk of offshore wind development with none of the benefit. The group exists to protect the region's visual amenity, natural environment and community social license. Seaspray and The Honeysuckles are the most affected communities, the only townships that sit on the coastline directly in front of the turbines. Seaspray and the Honeysuckles are severely residually impacted by the 'Cumulative affect' of multiple wind farm projects.

It should be noted that Seaspray and the Honeysuckles have generally been omitted from the EIS study which is disappointing considering they are townships that reside on the coastline in direct sight of the projects, affected directly by the construction and operation. Although pop up community events were held in Seaspray in conjunction with other proponents, (government departments and some meetings attended),



Stakeholder engagement, community surveys and Social Impact studies by Star of the South omitted the communities of Seaspray and The Honeysuckles which reflects in the EIS content.

This submission focuses on,

- Visual Amenity
- Social Impact
- Environmental Impact
- Business and Tourism
- Employment

and all commentary is derived from information provided in The Environmental Summary Report , The Blue Folders and Technical Reports .

It should be made clear how public feedback on the EIS, provided directly to Star of the South, will be used and whether it will be passed on to the Minister, the regulator and other relevant government bodies involved in decision-making. To address concerns about transparency and trust, the group should be informed once the feedback has been received and advised exactly how that information will be used. The EIS process appears to function as a consultation exercise that is difficult for the general community to read, understand and respond to, while primarily providing updated information for Star of the South's final management plan and final submission.

Cumulative Impact

This EIS does not address the cumulative impact of multiple offshore wind farms but merely references the possibility. The SIA does not adequately examine the consequences of industrialising the coastline, and the EIS does not provide a clear visual assessment of the cumulative impact of multiple adjacent offshore wind projects. It is not sufficient for the Star of the South documentation to state that detailed assessment was not possible because limited information was available about other projects at the time. Existing visualisation tools and IT programs could be used to model cumulative impacts by incorporating other feasibility licence holders, and aerial imagery of multiple offshore wind farms in Europe and Asia could also assist this assessment. The EIS should have included these visual examples rather than relying primarily on written tables and vague reference paragraphs. Its failure to clearly present the cumulative impacts on business, tourism, social values and seascape character is a significant omission. The 'never been done before' is now an ad nauseum comment heard to saturation point by affected communities, now met by a dissident distrust of all wind proponents and government departments involved in renewable energy.



Business and Tourism

In assessing the Star of the South project, the Seaspray and the Honeysuckles communities are the most affected by renewable development and must consider the cumulative effect. Proposed feasibility licences preparing to participate in the August auction including Star of the South will include up to 554 wind turbines reaching as tall as 350 metres. This will adversely affect business and tourism in the region removing the wild visual splendour of the coastline reducing it to an industrialised seascape/landscape. The EIS assessment touches on the cumulative impact but does not reference and draw analogies of this throughout the rest of the report.

The report omits Seaspray from most images and maps, including the DCCEEW declared zone and the Victorian Government's Gippsland offshore wind farm prospective map. This raises concerns about the authors' understanding of the Seaspray and Honeysuckles seascape, landscape and communities, as well as their assessment of both the standalone impacts of the development and the cumulative impacts of multiple adjacent projects. The SWFSG question the EIS and ask Star of the South to make efforts to engage Nott to include studies of Seaspray and The Honeysuckles.

Changed Seascape and visitation impact.

Seaspray and The Honeysuckles depend on seasonal visitors and day trippers. Tim Nott's *Impact Risk Register* identifies the initial and residual impacts as medium, high, and major, noting that a changed seascape could reduce amenity, lead to fewer visitors, and lower tourism revenue. However, the separate risk of a "potential loss of visitation that has built up around the wind farm" is recorded as having only a medium/moderate initial and residual impact.

Visibility of turbines day and night – The Star of the South visual assessment shows daytime and night-time visibility but assesses the project in isolation. It should also consider the cumulative visual impact of all proposed turbines and substations across the declared offshore wind area. Tim Nott's assessment of



visitation impacts does not adequately address these cumulative effects, leaving the report incomplete in its treatment of the declared area.

Nott compares potential visitation impacts with UK statistics. However, direct comparisons between Australia and the UK are problematic. Some UK coastal towns, including Rhyl Flats and Prestatyn, have experienced economic decline, shop closures and social issues. European visitors also have easier access to alternative coastal destinations without offshore wind farms, making those locations a more readily available choice for holidaymakers.

Seaspray and The Honeysuckles rely heavily on repeat visitation. Any short-term curiosity tourism associated with the wind farm is likely to be quickly exhausted, particularly given Australia's relatively small population.

Mitigation and positive impact, impacts on tourism and business is offset by Star of the South with increased accommodation demand during the construction phase. It needs to be noted again that confirmation by Blue Mackerel North is that employment opportunities will require travel so it must be assumed increased accommodation opportunities cannot be considered a potential benefit. What positive aspects can be added?

Surveys and Stakeholder consultation by the proponent

The EIS does not appear to include Seaspray businesses or volunteer organisations, meaning, these groups were omitted from the study.

- Seaspray General Store
- Jack Ryans
- Seaspray Surf Lifesaving Club
- Seaspray Caravan Park
- Seaspray CFA
- Casa Mangia

These businesses and organisations support local employment throughout the year, including both peak and off-season periods. Seaspray General Store alone employs 13 staff.

If Seaspray and The Honeysuckles were not consulted, then the consultation process failed to include the communities most directly affected by the proposal. Tim Nott notes that the surveys are unfit for purpose and that larger, more detailed surveys should have been undertaken instead of relying on limited face-to-face or in-house discussions.



Face to face accommodation consultation was conducted in locations such as Foster. Star of the South did not meet directly with Seaspray organisations to discuss the short-term and long-term aspects of the development. Instead, it surveyed communities located farther from the project and less likely to be affected. Surveys 7.33 and 7.34 are broad and don't include the townships or relevant local data needed to support meaningful conclusions. Only 13 businesses were surveyed.

Tim Nott, author of the report prepared for Star of the South, also noted the risk that the coast may be perceived as no longer natural or wild, causing tourism to decline as visitors choose other destinations or leave the region altogether.

If local business and tourism decline, house values may fall and communities may struggle to remain viable. This could also reduce regional support for essential services such as health, infrastructure and education.

Employment

is a key theme of the Business and Tourism assessment as well as the social assessment, but the employment figures vary between the summary, Blue and technical reports, making it difficult to identify reliable numbers. Blue Mackerel North has confirmed that there would be no employment opportunities for Seaspray and The Honeysuckles unless residents were prepared to travel significant distances. Star of the South refers to 215–683 full-time equivalent jobs during construction and 76–204 ongoing roles, but it is unclear whether these figures apply to this project alone or are spread across multiple developments, and what guarantees support them.

The assessment describes these as local Gippsland jobs, yet includes the Latrobe Valley, which broadens the definition of “local” beyond Wellington Shire. It is also unclear whether the projections include workers travelling from interstate or overseas for fixed-term employment in Gippsland. The report does not commit to mandated hyperlocal employment and instead notes that Gippsland employment outcomes will depend on supply and demand in related professions. By contrast, the Wellington Shire Readiness Report provides a clearer and more realistic employment outlook, while OWEV indicates that likely local opportunities would be in areas such as linen and catering rather than construction. Operations are expected to be based remotely from Barry Beach or Port Anthony, with remote monitoring of underground cabling and only small workforce groups needed for periodic inspections.

Fishing during construction

will be minimised. The Seaspray and Honeysuckles communities attract recreational fishers from all over the region, state and territories, famous for gummy shark, flathead and salmon. Potential reductions in numbers of fishers and disruption to fishing



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numbers will have a high impact on business to the surf lifesaving club, general store and caravan park, shifting income from one region to another or may be lost to the region altogether. The report does not mitigate long term solutions or plans should this occur.

Oil Spill Risk and Tourism Impacts Tim Nott's risk assessment rates the tourism risk associated with oil spills during construction and operation as very low. However, this rating should be properly quantified from both environmental and business tourism perspectives. Even the perception of an oil spill in the ocean could have adverse consequences for visitor confidence and the reputation of Seaspray and The Honeysuckles.

An actual oil spill could reduce visitation to Seaspray and The Honeysuckles, affecting local business turnover and employment. The report appears to consider only project vessels and records the risk as negligible. It does not adequately address other potential environmental incidents, such as fires, blade damage, blade destruction or blade shedding.



Social Impact Assessment studies – Prepared by Public Place Melbourne

Overview of Community Impacts

Seaspray and The Honeysuckles are coastal townships on the Ninety Mile Beach coastline and are among the communities most directly affected by proposed offshore wind projects located approximately 10 kilometres from shore. The Star of the South project forms part of a broader cumulative impact associated with the eventual development of up to 554 turbines along this coastline.

Focus of the Social Impact Assessment

The Social Impact Assessment focuses primarily on the following themes:

- Employment
- Accommodation and housing
- Coastal landscape and amenity
- Fishing activities

Seaspray and The Honeysuckles do not appear to be treated as key communities in the assessment. The report gives little indication that Public Place spent sufficient time in Seaspray to understand local sentiment, community concerns, or the social licence requirements associated with offshore wind development.

Social Licence and Community Wellbeing

The assessment does not adequately address social licence or the broader effects of the project on the community, including:

- Social cohesion
- Social capital
- Trust
- Mental health and wellbeing
- The effects of visual amenity on mental health and wellbeing
- Economic impacts
- Property values - impact
- Energy reliability and local outcomes
- Living with industrial machinery, pollution and breakdowns



Although the report refers to employment, accommodation changes, coastal character and amenity, it does not provide sufficient depth on the likely consequences of the proposed project or the residual impact to all receptors both permanent and visiting. Significant social issues are either omitted or treated only briefly. Given the scale and long-term nature of the impacts for coastal communities, the assessment appears too limited in scope and detail.

Stakeholder Engagement

Star of the South built a Community Advisory Group comprised of residents, affected landowners, business owners and local government representatives. Members were consulted to gather their views. However, Seaspray and The Honeysuckles were not invited to participate and were therefore excluded from discussions, surveys and planning processes, despite being directly affected communities.

The communities of Seaspray The Honeysuckles and Glomar Beach understand the value of a thorough SIA and were engaged by Nous Group for the Blue Mackerel project. Nous Group visited twice and met with the SWFSG and then in a structured community meeting. This meeting was attended by over 400 passionate community members, and the report is definitive and detailed on the sentiment of the community. The community members of Seaspray and The Honeysuckles are well educated and have a comprehensive understanding of the Offshore Wind Development. These communities are united in the stance that 10km is too close and the social impact of turbines so close to the coastline don't have social licence and raise too many environmental concerns.

Had Public Place engaged with the communities of Seaspray and The Honeysuckles the residual impact discussions would have been, Magnitude – very large, Sensitivity – highly disruptive, Rating – major negative

The Social Impact Assessment prepared by Public Place has not engaged with key groups in Seaspray and The Honeysuckles, including:

- Ratepayers
- Visitors
- Businesses
- Volunteer groups

The Social Impact assessment would report very differently to the existing report and therefore cannot be construed as a reliable report moving forward.



Visual Appearance and Amenity

Visual appearance and amenity are referenced throughout the assessment. Public Place identifies several potential impacts, including:

- “The visual appearance and character of the waters would become less natural, and the scale of the turbines may be off-putting.”
- “Construction will alter amenity and character. Homeowners and holidaymakers may consider leaving the community.”
- “Wind turbines and other structures may dissuade some campers from using the area.”

Turbines will be visible from Seaspray and the Honeysuckles both during the day and at night. The turbines will be visible regardless of weather conditions. Star of the South by their own admission at the Seaspray Ratepayers meeting acknowledged the night visuals will be greater and disruptive.

Repeated The SIA does not adequately examine the consequences of industrialising the coastline, and the EIS does not provide a clear visual assessment of the cumulative impact of multiple adjacent offshore wind projects. It is not sufficient for the Star of the South documentation to state that detailed assessment was not possible because limited information was available about other projects at the time. Existing visualisation tools and IT programs could be used to model cumulative impacts by incorporating other feasibility licence holders, and aerial imagery of multiple offshore wind farms in Europe and Asia could also assist this assessment. The EIS should have included these visual examples rather than relying primarily on written tables. Its failure to clearly present the cumulative impacts on business, tourism, social values and seascape character is a significant omission. The ‘never been done before ‘ is now an ad nauseum comment heard to saturation point by affected communities , now met by a dissident distrust of all wind proponents and government departments involved in renewable energy.

Coastal Character and appearance

The visitors and residents of Seaspray and The Honeysuckles are drawn to the 90 Mile Beach Coastline for its raw natural beauty, wild natural flora and fauna, peace and tranquillity. The communities of Seaspray were engaged by Nous Group for the Blue Mackerel project , they met with the SWFSG and a structured community meeting. This



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meeting was attended by over 400 passionate community members, and the report is definitive and detailed on the sentiment of the community.

Seaspray has a large comprehensive General Store and Surf Life Saving club, both establishments are active and very much a part of the social fabric of the township and adjacent communities. Regional towns not only visit as a holiday destination but to partake in life saving activities and to learn fundamental water safety skills.

Public Place notes that visitor reason is to connect with its raw wild natural character. The SIA does not go into any detail on how the project will affect the community as a society and social being, mental health, wellbeing and economic fallout.

Sound

Infrasound Low-frequency noise is produced as wind turbine blades rotate, spreading through the air and across land and water.

Wind turbine blades also create wake turbulence. Aircraft already operate above Seaspray, including Air Force Roulettes practising aerobatics, and planes and helicopters patrolling beaches for sharks or transporting injured patients to hospital during summer.

Although humans cannot hear infrasound, they can feel it. It may contribute to heart, organ, psychological, and sleep-related stress, particularly because infrasound can intensify in enclosed spaces such as bedrooms.

Whales, however, use infrasound to communicate. According to your EIS report, nine whale species were observed during five hours of monitoring per month over four years, representing many thousands of whales passing through the proposed wind farm area during those periods. These figures are likely to understate the true number and would be much higher if based on continuous year-round monitoring.

Your EIS report also states in Folder W, page 153, that infrasound would travel at least 20 kilometres—covering Port Albert and Ninety Mile Beach and reaching southern areas of Yarram—exceed EPA thresholds, and present a risk.

Unanswered questions remain, what are these risks, how are they being measured, is the EPA aware that its thresholds may be exceeded, and what mitigation measures will be implemented to remove risks to aircraft, people, and whales?



Construction Operation and environment

- 1 The EIS summary report discusses construction noise but does not adequately address the physical construction and operation of wind turbines within the movement pathways of whales and other marine animals. The project's own survey results indicate that, over a 31-month period from December 2019 to August 2023, aerial surveys totalled 161.34 hours, or approximately five hours per month. During this limited survey effort, 7,065 marine mammals were recorded, including 334 whales, 4,739 dolphins and 214 seals. This area forms part of a major whale migration pathway for around six months each year. When the cumulative impact of up to 554 wind turbines along the coastline is considered, the potential effects on whale populations migrating between South Australia and Queensland could be significant.
- 2 Boat-based bird and bat surveys were conducted between January and December 2021. According to the survey, 26,088 birds were observed in the area. Some of these species are migratory, and there is no certainty that they will follow the same flight paths each year. Collision risk modelling has been used to estimate the likelihood of birds colliding with turbines, and a seabird monitoring and management plan is proposed to minimise impacts and risks and prevent unacceptable outcomes. However, no detail has been provided about what that plan will include.

Oil Spills modelling and mitigation The EIS contains only limited modelling of potential oil-spill scenarios and provides insufficient detail about mitigation measures. This is a significant concern. In addition to shutdown procedures, the project should address the risk of oil release from turbines, substations and associated infrastructure, as well as the potential for blades or other components to fall into the ocean. Such incidents could cause serious environmental and economic harm, including disruption to the coastline, shipping, marine life such as whales, dolphins and seals, and tourism, particularly during peak visitor periods when beach closures and clean-up activities would have the greatest impact. The time required to activate and implement an effective response could also be considerable.

The EIS should not dismiss these risks as rare or unlikely. Recent incidents in Victoria, including two land-based turbine fires in which blades fell to the ground and a separate incident involving a nacelle detaching, demonstrate that failures can occur. With up to 500 turbines potentially operating along the coastline under different companies, the



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cumulative risk is a serious concern that requires clear assessment, prevention measures and response planning.

The EIS fundamentally fails to include meaningfully the most affected communities, Seaspray, The Honeysuckles, and Glomar Beach, in its statement reports. Passing references to these communities cannot credibly be presented as consultation, study, or detailed assessment. Cumulative impact is either inadequately addressed or effectively ignored (incredible excuses such project individuality and government restriction are used by the Star of the South and Government departments together). Star of the South appears to have directed its surveys toward areas and communities more likely to produce favourable outcomes, while excluding those most likely to challenge the project and defend their homes, coastline, and environment. Seaspray and The Honeysuckles are being asked to carry the risk whilst treated as expendable, irrelevant, and acceptable collateral damage in the pursuit of this development. The Social Impact, Business and Tourism reports have failed the legislative expectations as well as the community it is designed to serve. The EIS in its current state is not fit for purpose relevant to Seaspray and The Honeysuckles.