

Complaint Investigation and Response Plan

PLANNING and ENVIRONMENT ACT
MOYNE PLANNING SCHEME

PERMIT NO. 20060220-4

ENDORSED PLAN
Sheet 1 of 18

Signed: _____ for
MINISTER FOR PLANNING
Date: 22 JULY 2024

Woolsthorpe Wind Farm

29-May-2024

Complaint Investigation and Response Plan

Woolsthorpe Wind Farm

Client: Woolsthorpe Asset Pty Ltd as trustee for Woolsthorpe Asset Trust

ABN: 71924934608

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Quality Information

Document Complaint Investigation and Response Plan

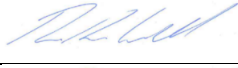

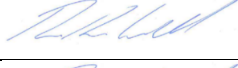
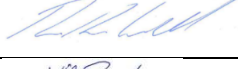


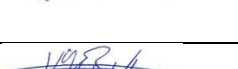
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Checker/s E. Ryan

Verifier/s K. Butler

Revision History

Rev	Revision Date	Details	Approved	
			Name/Position	Signature
A	19-Feb-2019	Draft	Don Webb Associate Director - Power	
B	03-Apr-2019	Draft	Don Webb Associate Director - Power	
C	13-May-2019	Final	Don Webb Associate Director - Power	
D	05-Sep-2019	Final Amended	Don Webb Associate Director - Power	
E	31-Jan-2024	Final Re-issue	K Butler Associate Director – Urbanism and Planning	
F	15-Feb-2024	Final Re-issue	K Butler Associate Director – Urbanism and Planning	
G	29-May-2024	Final Re-issue	K Butler Associate Director – Urbanism and Planning	

**PLANNING and ENVIRONMENT ACT
MOYNE PLANNING SCHEME**

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**ENDORSED PLAN
Sheet 3 of 18**

Signed:  for
MINISTER FOR PLANNING
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1.0 Introduction

This document presents the Complaint Investigation and Response Plan (**Plan**) to manage complaints received from the community and project neighbours in relation to Woolsthorpe Wind Farm (**WWF**).

The Plan has been prepared in accordance with Conditions 20 to 25, 27, 30 and 31 of Planning Permit 2006/0220/C (the Planning Permit). Per Condition 20, the Plan..

...has been designed to respond to all aspects of the wind farm, except noise associated with the operation of the wind turbines, including (but not limited to): construction noise, construction impacts, traffic and shadow flicker.

1.1 Key Parties

Wind Farm Owner:

Woolsthorpe Asset Pty Ltd as trustee for Woolsthorpe Asset Trust (ABN: 71 924 934 608)
Level 25, Governor Macquarie Tower, 1 Farrer Place, Sydney NSW 2000

Wind Farm Operator:

Enerfin Energy Services Pty. Ltd. (ACN: 630 606 478)
Level 19, 90 Collins Street, Melbourne VIC 3000

1.2 Referenced Documents

The following documents are referenced throughout this plan:

- [1] Woolsthorpe Wind Farm Planning Permit (2006/0220/C), which includes the permit and documents required to be submitted and approved under this permit
- [2] *AS/NZS 10002:2014 Australia/New Zealand Standard, Guidelines for Complaint Management in Organisations.*

1.3 Scope

The Wind Farm Owner will implement and comply with this Plan during construction and operation of WWF. They will do so by delegating the Plan responsibilities to the Wind Farm Operator or the Wind Farm constructor as applicable, noting ultimately the Wind Farm Owner remains responsible for complying with the conditions of the Planning Permit.

The endorsed copy of this Plan will be made publicly available on their website (<https://www.woolsthorpewindfarm.com/>). The Complaints Incident Register (**CIR**) compiled in relation to this Plan shall be submitted to the responsible authority annually as well as on request (condition 23). Modifications to this Plan will also be submitted for approval if required.

1.4 Planning Permit Conditions

Table 1 presents the relevant Planning Permit conditions and the Sections of the Plan that address the condition.



Table 1 Planning Permit Conditions for WWF relevant for the Plan

Planning Permit Condition No.	Condition Wording	Section of this Plan
20	Before the development starts, the permit holder must prepare a Complaint Investigation and Response Plan to the satisfaction of the responsible authority. When approved, the plans will be endorsed by the responsible authority and will then form part of this permit. The complaint investigation and response plan will be designed to respond to all aspects of the wind farm, except noise associated with the operation of the wind turbines, including (but not limited to): construction noise, construction impacts, traffic, shadow flicker.	This Plan; Documents Referenced under Section 1.2
21	The endorsed complaints investigation and response plan must be publicly available on the wind farm operator's website.	2.2
22	The plan must be prepared in accordance with <i>Australian/New Zealand Standard AS/NZS 10002:2014 – Guidelines for complaint management in organisations</i> and shall 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) Details of the appropriate council contact telephone number and email address (where available) f) A table outlining complaint information for each complaint received, including: i. The complainant's name ii. Any applicable property reference number if connected to a noise 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 conditions and description of the complainant's concerns including the potential incidence of special audible characteristics (for a noise complaint) vi. The processes of investigation to resolve the complaint.	2.0, 3.0 and Appendix B
23	A report including a reference map of complaint locations, and outlining complaints, investigation and remediation actions is to be provided on an annual basis to the satisfaction of the responsible authority.	3.0
24	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.	1.3
25	The owner of the wind energy facility must implement and comply with the approved Complaint, Investigation and Response Plan for the duration of the operation of the wind energy facility.	1.3

Planning Permit Condition No.	Condition Wording	Section of this Plan
27	<p>Shadow flicker from the wind energy facility must not exceed 30 hours per annum at any dwelling existing at 8 July 2022.</p> <p>This condition does not apply to any dwelling on land on which part of the wind energy facility is erected. Any required exemption must be given effect by an agreement with the landowner which is registered on the title to the land and will apply to any occupant of the dwelling. The agreement must be entered into before the use commences.</p> <p>Note: Inclusion of the exemption as part of any agreement made under Condition 15 will be one way to satisfy this condition.</p>	2.8
30	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 the any dwelling in the area which existed at the date of the pre-construction survey, a post- construction survey must be carried out at the dwelling.	2.0
31	If the post-construction survey establishes any increase in interference to reception as a result of the wind energy facility operations, the wind energy facility operator must undertake measures to mitigate the interference and return the affected reception to pre-construction quality at the cost of the operator and to the satisfaction of the responsible authority.	2.9



2.0 Complaint Structure and Process

2.1 Wind Farm Representative

The Wind Farm Representative, a representative of the Wind Farm Owner, in conjunction with the Site Manager, is accountable for ensuring all complaints are managed in accordance with this Plan. Any complaint in relation to the operation of WWF can be directed to the Wind Farm Representative using the contact details below.

James Taylor

Business Development Manager

Enerfin Energy Services Pty. Ltd.

Email: jtaylor@elecnor.com

contactus.woolsthorpe@elecnor.com

Phone (toll-free): 1800 966 095

The contact details of the Wind Farm Representative will be communicated to the public via:

- Signage in surrounding communities that will be established and maintained for the term of the Operations and Maintenance Agreement
- Community notice boards **PERMIT NO. 20060220-4**
- A letterbox flyer to be distributed throughout the surrounding community
- The Wind Farm Operator's website (<https://www.woolsthorpewindfarm.com/>).

Furthermore, an automatic answering service for the receipt of after-hours complaints will be provided, noting:

- All calls recorded in the answering service must be returned within the next business day. If the returned call is unsuccessful, the time of the call must be recorded
- In the case that the complainant does not have an automatic answering service, calls must be made on each subsequent business day until successful.

2.2 Moyne Shire Council Contact

Moyne Shire Council contact details are listed below.

Vicki Askew-Thornton

Email: moyne@moyne.vic.gov.au (Attn: statutory Planning)

Phone: (03) 5568 0555

2.3 Investigative Party

The Investigative Party may be an independent engineer, specialist and/or the Wind Farm Representative depending on the conditions of the Planning Permit. The Investigative Party is required if additional assessment or monitoring is required to evaluate and mitigate a potential compliance breach in relation to Construction Activity Controls (Construction Traffic, Environmental and Safety Management Plans) or Operational Performance Requirements (Planning Permit Conditions).

If non-compliance is identified, the Investigative Party will submit a remediation plan to the satisfaction of the responsible authority (Federal, state or local departments) outlining the investigation process, complainant communications, actions and timelines to resolve the complaint/breach.

2.4 Complaint Process Flow Chart

Appendix A outlines the complaints management process, from receipt of the complaint through to close.

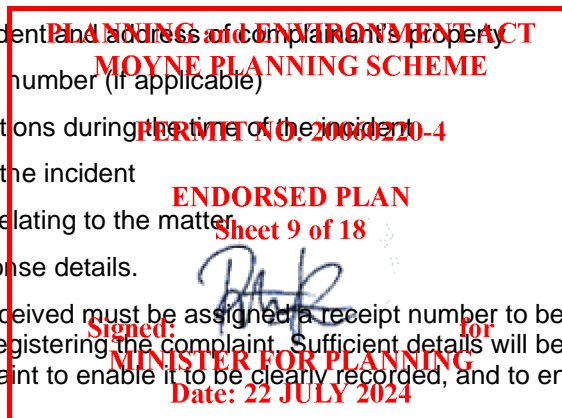
2.5 Incident Register Form

A template Incident Register Form (**Form**) to be completed by the Wind Farm Representative is located in Appendix B. This form addresses Condition 22 of the Planning Permit. All complaint details must be registered in the CIR, an electronic database. The CIR will be maintained by the Wind Farm Representative throughout the duration of the operation of WWF.

All details received from the complainant will be recorded in the form to capture detailed information, including:

- a. The name, address and contact details of the person who made the complaint
- b. The date and time of the complaint
- c. The receipt number of the complaint
- d. The date and time of the incident
- e. The location of the incident and address of complainant's property
- f. The property reference number (if applicable)
- g. External weather conditions during the time of the incident
- h. Detailed description of the incident
- i. Any other information relating to the matter
- j. Investigation and response details.

Note that each complaint received must be assigned a receipt number to be provided to the complainant at the time of registering the complaint. Sufficient details will be sought regarding the specific nature of the complaint to enable it to be clearly recorded, and to enable subsequent assessment and action.



Regarding a blade shadow flicker complaint, the complainant must be advised that no remedial action will be taken if the investigation process determines that the blade shadow flicker meets the performance requirement according to Condition 27 of the Planning Permit. An excerpt of the associated performance requirement may be provided to the complainant upon request.

2.6 Investigation and Response

The Wind Farm Representative in conjunction with the Site Manager, is responsible for ensuring all complaints are processed in a timely manner. The Wind Farm Representative will attempt to resolve all complaints within five business days of receiving the original complaint, and where practicable complaints will be resolved sooner than the prescribed timeframe. However, if this is not possible (for example if further investigations are required or are on-going), the Wind Farm Representative will notify the complainant that further time is required.

Complaints will be acknowledged by the Wind Farm Representative within 48 hours, and communication with the complainant will be maintained throughout the investigation process.

2.7 Complaints During Construction

Complaints received during the construction phase will be directed and / or reported within 24 hours to the Project Manager from the Wind Farm Representative and acknowledged within 48 hours. This will include any complaints relating to the construction process, either on, or off-site, including construction noise, dust, safety, traffic, and public road damage or related issues. Furthermore, the WWF Contractor and Wind Farm Owner's personnel responsible for health, safety, and environmental issues, will be made aware of all complaints relating to potential environmental or safety incidents.

The Project Manager will review the activity for which the complaint is related to and investigate the source of the complaint. If it is not occurring in accordance with the Construction Activity Controls or Planning Permit, they will prepare and implement a response plan to rectify the issue. The investigation process will be reported back to the Wind Farm Representative and recorded in the Form and CIR.

2.8 Complaints During Operation

Complaints received during the operational phase will be directed and / or reported within 24 hours to the Site Manager from the Wind Farm Representative, and where practicable complaints will be resolved sooner than the prescribed timeframes. If the reason is due to maintenance, a defect or unusual operating conditions, the issue will be rectified. The complainant will then be provided with a summary of the investigative process and outcome.

In all other situations, except for operational noise complaints¹, the Site Manager will investigate if the cause of the complaint is in breach of any Operational Performance Requirements, or the Planning Permit. If the investigation concludes with a high level of certainty that the circumstances surrounding the incident do not breach the relevant requirements or conditions, no further action will be taken. For the specific investigation process for blade shadow flicker refer to the following section.

If it becomes apparent that WWF is not compliant with the relevant Operational Performance Requirements or Planning Permit, the cause of the complaint will be further investigated and if required, the Wind Farm Representative will prepare and implement a remedial plan outlining how it will rectify a demonstrated non-compliance.

2.9 Investigation of Blade Shadow Flicker Complaints

The following steps will be followed when investigating blade shadow flicker complaints:

- a. Determine if the blade shadow flicker complaint is due to a maintenance issue or repairs, mechanical defect or out of the ordinary operation of WWF. If the reason is due to maintenance, a defect or unusual operating conditions, the issue will be fixed. The complainant will then be provided with a summary of the investigative process and outcome.
- b. Analysis of non-WWF events such as weather conditions, environmental conditions and recorded activities in the area of the incident to determine if this could have impacted the blade shadow flicker complaint.
- c. Determine if blade shadow flicker monitoring has been completed at site of complainant or at a nearby representative location.
 1. Where blade shadow flicker monitoring has been completed, an investigation into the changed conditions will be completed.
- d. If predicted blade shadow flicker meets Condition 27 in the Planning Permit, the complainant will be provided with a summary of the findings, concluding that no further remedial action is required.
- e. If predicted blade shadow flicker breaches Condition 27 in the Planning Permit or performance requirement detailed in an existing landowner agreement, remedial actions or mitigation measures may be required. Further options will be discussed with the complainant. Options for further investigation may require specialist engineers and may include; modelling blade shadow flicker at the location of the incident to account for any new information, providing information on the blade shadow flicker monitoring process, discussing options to mitigate the blade shadow flicker issues or completing blade shadow flicker monitoring at the location in question.
- f. In the case where the performance requirement is breached, appropriate mitigation measures must be implemented in agreement with the complainant including but not limited to:

¹ Wind turbine noise from a Wind Energy Facility is subject to specific regulations under the *Environment Protection Regulations 2021* made under the *Environment Protection Act 2017*, as detailed in *Environment Protection Amendment (Wind Turbine Noise) Regulations 2022*. The Environment Protection Authority Victoria (EPA) regulate noise from ongoing operations once a wind farm begins operating. Concerns about wind energy facility noise emissions may be directed to the EPA.

1. Installation of screening structures and/or planting of trees to block shadows cast by the wind turbines; or
 2. Use of wind turbine control strategies which shut down wind turbines when blade shadow flicker is likely to occur.
- g. Where mitigation measures are agreed to be implemented, blade shadow flicker modelling or monitoring at the location in question will be conducted prior to the implementation of the mitigation measures and post implementation of the mitigation measures to ensure the predicted blade shadow flicker does not exceed the performance requirement.
1. All actions taken are to be recorded in the electronic Incident Register form.

2.10 Resolution and Closure

The Wind Farm Representative will communicate the outcome of the complaint using the most appropriate method. The Wind Farm Representative will advise:

- a. What actions were undertaken in response to the complaint
- b. The outcome
- c. The reasons decisions have been made
- d. Any remedy or resolutions that have been offered
- e. Information about other remedies that may be available to the complainant.

All investigative actions and response plans are recorded in the CIR. The Wind Farm Representative will close out the complaint if the complainant accepts the resolution. However, if the complaint cannot be resolved by the Wind Farm Representative to the satisfaction of the complainant, the complaint may be escalated to the Office of the Australian Energy Infrastructure Commissioner for further review and investigation.



3.0 Reporting and Review

A report including a reference map of complaint locations, details, investigations, and remediation actions will be provided on an annual basis to the Minister for Planning according to Condition 23 in the Planning Permit.

A review of the Plan will be conducted every 12 months. The review will evaluate the performance of the complaint management process, ensure it aligns with any changes in legislation and regulatory requirements, as well as continually improve the effectiveness and efficiency of the system. Modifications will be reported to the Minister for Planning.

The report will include a summary of:

- a. Complaints received in the preceding 12 month period
- b. Complaint locations outlined on a map
- c. Investigative actions undertaken to resolve the complaints
- d. The remediating actions undertaken in response to demonstrated non-compliance
- e. If required, any modifications to the Plan
 1. Suitability to achieve complaint management objectives
 2. Conformity to complaint management conditions in the Planning Permit.



**PLANNING and ENVIRONMENT ACT
MOYNE PLANNING SCHEME**

PERMIT NO. 20060220-4

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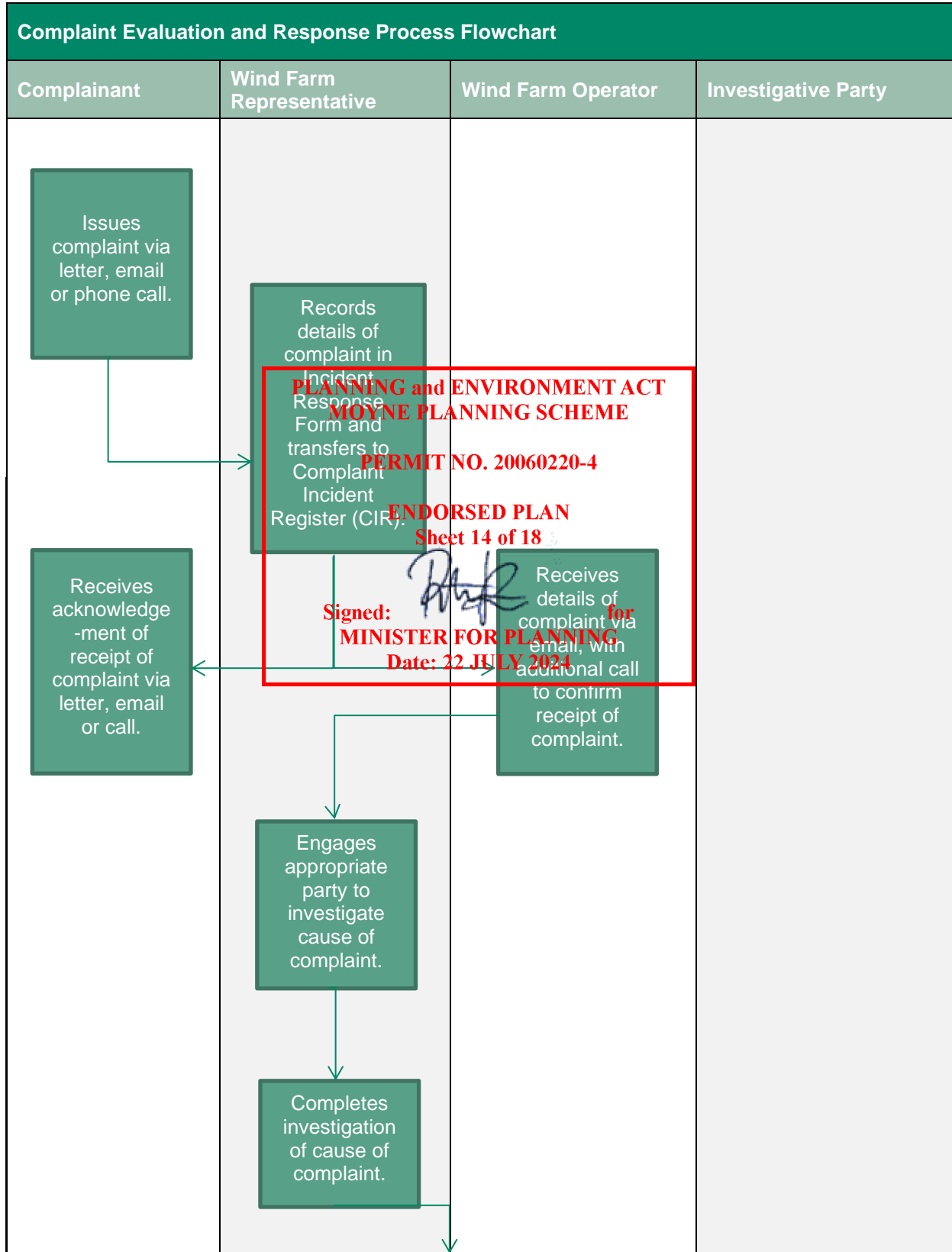
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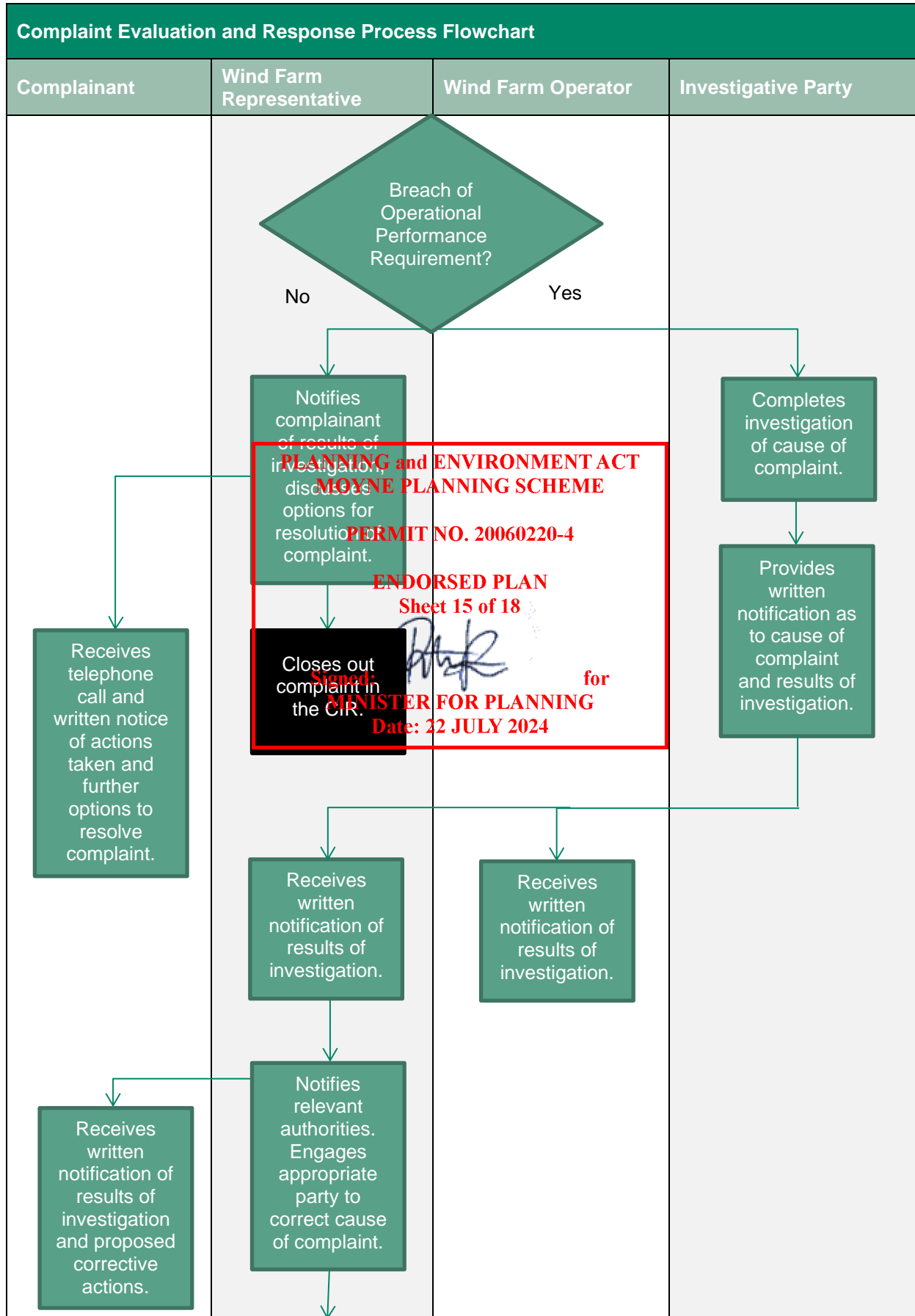
Appendix A

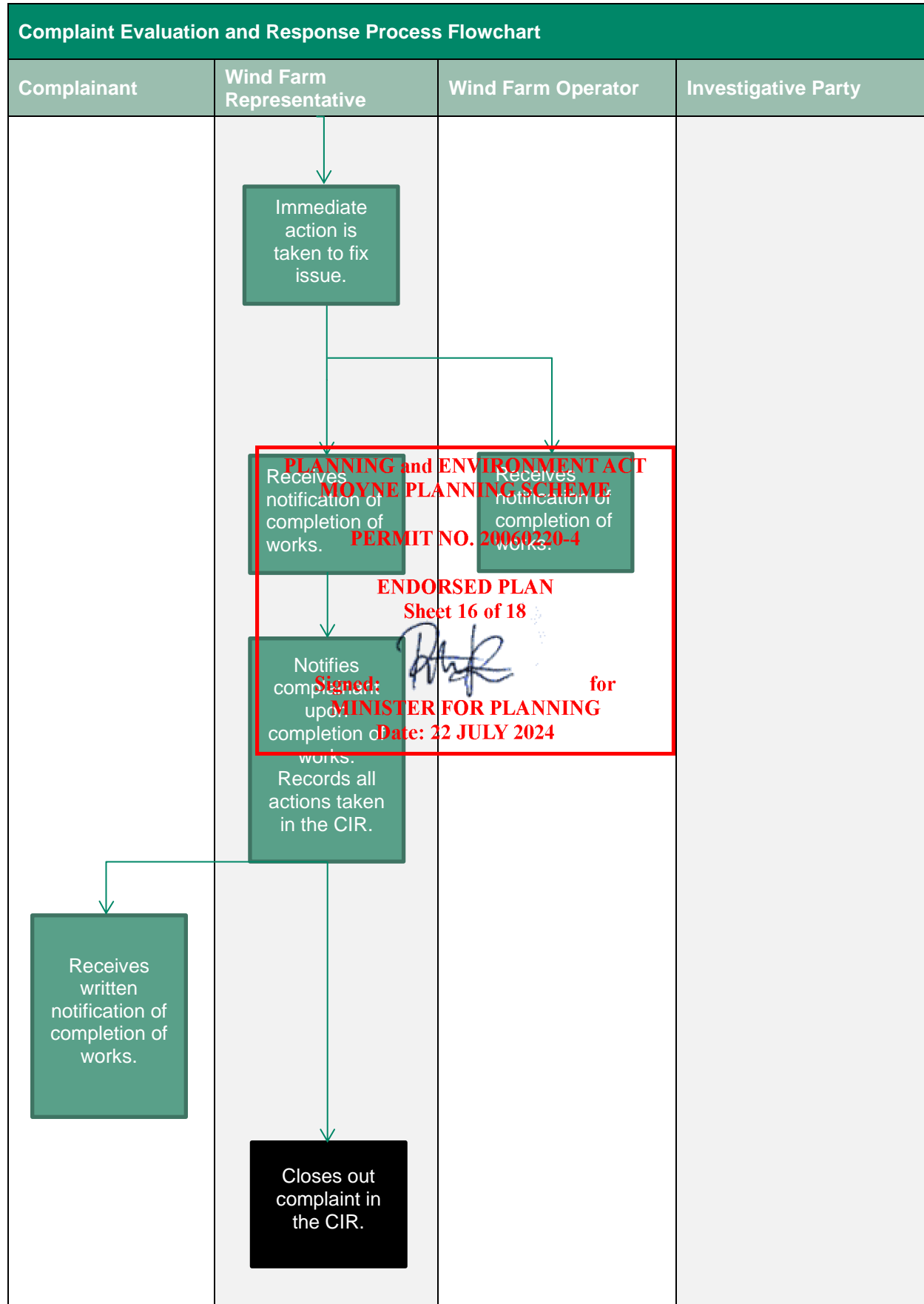
Complaint Investigation and Response Process

Appendix A Complaint Investigation and Response Process

Table 2 Complaint, Investigation and Response Process Flowchart







**PLANNING and ENVIRONMENT ACT
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**ENDORSED PLAN
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Signed:  for
MINISTER FOR PLANNING
Date: 22 JULY 2024

Appendix B

Incident Register Form

Appendix B Incident Register Form

Table 3 Incident Register Form

Question	Response
Complainant Details	
Name of complainant	
Address of complainant	
Preferred Contact Number	
Date and time of complaint	
Details of the Incident	
Complaint Receipt Number (must be communicated to the complainant)	
Date and time of the incident	
Location of the incident/Address of property	
Property Reference Number (if applicable)	
Detailed description of complaint	
Detailed recount of the incident	<p>PLANNING and ENVIRONMENT ACT MOYNE PLANNING SCHEME</p> <p>PERMIT NO. 20060220-4</p> <p>ENDORSED PLAN Sheet 18 of 18</p> <p>Signed:  for MINISTER FOR PLANNING Date: 22 JULY 2024</p>
a. Recount of events	
b. Complainant location during the incident	
Approximate duration of the incident	
Weather conditions at time of incident	
a. Temperature	
b. Day/Night	
c. Wind	
d. Wind direction (if known)	
e. Description of cloud cover (if known)	
Detailed description of nature of the incident	
Construction or Operational incident	
a. Number of sources	
b. Frequency	
c. Qualitative description of blade shadow flicker, if applicable	
d. Description of how the incident affects them	
Any other information offered by complainant	
Investigation Process	
Response Plan applicable to incident	
Log of actions taken during investigation to date	
Close of Complaint	
List of actions taken to resolve incident	
Date and Time - Complainant Notified	
Date and Time - Incident Closed	