



Director, Environment Protection
Department of Environment, Land, Water and Planning
1 Nicholson St
East Melbourne, VIC 3000

Via: www.engage.vic.gov.au

26/02/2021

Dear Sir / Madam,

SUBMISSION ON CHANGES TO THE REGULATION OF WIND FARM NOISE

1.0 Introduction

Tilt Renewables Limited (**Tilt Renewables**) welcomes the opportunity to provide a submission on proposed changes to the way wind farm noise is managed, specifically in relation to the incoming *Environment Protection Act 2017 (new EP Act)* with the introduction of a 'general environmental duty (**GED**)' and 'unreasonable noise' provisions. In addition to this submission Tilt Renewables would be willing to provide any further information that may assist the Department of Environment Land Water and Planning (**DELWP**) and the Environment Protection Authority (**EPA**) with its analysis.

Tilt Renewables owns and operates seven wind farms across Australia (within SA, VIC and NSW) and New Zealand, with a further two wind farms under construction/commissioning and has over 20 years' experience in the consenting, construction and operation of renewable electricity generation infrastructure. Tilt Renewables owns and operates two of the oldest wind farms in Australia, the Blayney Wind Farm and Crookwell Wind Farm in NSW, commissioned in 1998 and 2000 respectively. Tilt Renewables also developed, owns and operates the Tararua Wind Farm in New Zealand which recently celebrated its 20th anniversary.

The company operates a significant share of wind generation capacity in Australia and New Zealand, with a total capacity of 836 MW either installed or under commissioning. Tilt Renewables' renewable electricity generation infrastructure in Victoria includes the Salt Creek Wind Farm (54 MW) and the Dundonnell Wind Farm (336 MW) both within the Moyne Shire. Tilt Renewables also has a very significant pipeline of over 4,000 MW of wind and solar projects in Australia (within SA, WA, VIC, NSW and QLD) and New Zealand of which more than 2,000MW have secured the required planning approvals.

As a long-term asset owner Tilt Renewables know that local community and stakeholder support is critical to our success. Our values are centered around the importance of people, including doing what we say we will, for all stakeholders.

Tilt Renewables is able to draw on a wealth of directly relevant experience able to provide feedback on the proposed changes to the way wind farm noise is managed in Victoria.

2.0 Regulatory Framework & Proposed Regulations

Tilt Renewables supports the stated aim to provide clear and consistent wind farm noise regulation to provide

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certainty to industry and confidence for communities. Following review of the Regulatory Impact Statement (**RIS**) released as part of this consultation, Tilt Renewables agrees that this aim is best achieved with new wind farm regulations under the new EP Act (Option 1) (rather than through the base case 'do nothing' approach or permissions regime).

It is acknowledged that a clear and explicit framework, which is consistent across all wind farms, can enhance confidence for industry that the settings they have in place will protect them from opportunistic legal challenges. A clear framework will also benefit Victorian communities, by ensuring the risk of wind farm noise will be responsibly managed throughout the life of projects and that communities better understand operators' obligations.

Tilt Renewables supports the EPA being the primary regulator for wind farm noise within Victoria.

Whilst Tilt Renewables support the proposed framework there are a number of concerns relating to the specific requirements / drafting of the *Exposure Draft of the Environment Protection Amendment Regulations 2021* (**proposed Regulations**) released by DELWP. Overarching concerns include:

- *Purpose of Regulatory Framework*

In transferring wind noise compliance obligations into direct regulations, it is important to acknowledge that the underlying rationale for this change is the need for clarity for operators and communities. Tilt Renewables considers that on the whole, the existing noise management framework through *the Planning and Environment Act 1987* offers appropriate protection of neighbouring communities. It is Tilt Renewables' understanding that the proposed changes to the noise management framework has not been driven by the need for more onerous regulations on the wind industry.

In the National Wind Farm Commissioner's Annual Report for the 2019 calendar year, the report noted very low levels of complaints relating to operating wind farms (5 across Australia) and wind farm noise (10 in Australia in 2019¹), and a steady decline in these complaints over time. These findings are consistent with Tilt Renewables experience, with only very few noise complaints having ever been received for operating wind farms and only within the first few months of operations before being resolved. This demonstrates that there is no evidence-based justification for significant new noise compliance burdens to be placed on the wind industry. As such, the fundamental purpose of the Victorian Government's regulatory review and the implementation of any new regulations should be to provide enhanced clarity in relation to how noise emissions from wind farms are to be appropriately managed.

- *Complementary Planning Reform*

We understand that a complementary reform to the *Planning and Environment Act 1987* is proposed however there is no information currently publicly available.

Without amendments, the draft Regulations may lead to significant overlap and potentially inconsistent assessment, reporting and enforcement requirements applying under both regimes. This will require urgent attention if the Regulations are to proceed. Even with amendments it is unclear how the Regulations will deal with existing operational projects or projects which already have obtained a planning permit.

The table overleaf provides Tilt Renewables' feedback on the specific aspects of the proposed Regulations, and outlines where Tilt Renewables supports the proposed approach or how they could be amended to provide the risk-based framework required to ensure that wind farm operators appropriately manage their risks and obligations.

¹ Including complaints received for development projects.

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Regulation		Response
131 A	<p>Relevant noise standard</p> <p>(1) <i>The relevant noise standard for a wind energy facility that commenced operation before 1 July 2021 is—</i></p> <p>(a) <i>NZS 6808:1998, if the planning permit or other authorising document under the Planning and Environment Act 1987 for the facility—</i></p> <p>(i) <i>requires compliance with that standard; or</i></p> <p>(ii) <i>does not specify a noise standard; or</i></p> <p>(b) <i>NZS 6808:2010, if the planning permit or other authorising document under the Planning and Environment Act 1987 for the facility requires compliance with that standard; or</i></p> <p>(c) <i>the conditions or standards other than those referred to in paragraph (a) or (b) that are specified in the planning permit or other authorising document under the Planning and Environment Act 1987 for the facility, if any.</i></p> <p>(2) <i>The relevant noise standard for a wind energy facility that commences operation on or after 1 July 2021 is—</i></p> <p>(a) <i>NZS 6808:2010; or</i></p> <p>(b) <i>the conditions or standards other than those referred to in paragraph (a) that are specified in the planning permit or other authorising document under the Planning and Environment Act 1987 for the facility, if any.</i></p>	<p>Tilt Renewables support reference to the relevant NZ Standards, including either:</p> <ul style="list-style-type: none"> - New Zealand Standard 6808:1998, Acoustics—The Assessment and Measurement of Sound from Wind Turbine Generators, published by Standards New Zealand in 1998 (NZS 6808:1998) - New Zealand Standard 6808:2010, Acoustics—Wind farm noise, published by Standards New Zealand in 2010 (NZS 6808:2010) <p>However, it is suggested that the drafting should be revised to reflect that Regulation 131A (1)(c) is considered an 'and' rather than an 'or' when applying this provision. The same suggestion applies to Regulation 131A (2)(b). This will ensure that site specific noise limits (including where an agreement has been reached between the operator and dwelling owner) or any other site-specific requirements are accommodated, and where there are inconsistencies between the planning permit conditions and the relevant NZ Standard that it does not open up the operator to unnecessary legal action.</p>
131B	<p>Duties on operators of wind energy facilities</p> <p>(1) <i>An operator of a wind energy facility must ensure that wind turbine noise emissions comply with the requirements of the relevant noise standard.</i></p> <p>(2) <i>The operator must take all applicable actions set out in this Division to manage and review the emission of wind turbine noise by the facility.</i></p>	<p>Tilt Renewables support the duties outlined within this Section of the proposed Regulations, however note that the drafting only refers to compliance with the GED (through reference to 'section 25(1)(see regulation 6)') however suggest that this should also reference unreasonable noise.</p>



Regulation		Response
		<p><i>Note</i></p> <p><i>Act compliance—section 25(1) (see regulation 6).</i></p>
131C	<p>Post-construction noise assessment</p> <p>(1) <i>An operator of a wind energy facility that commences operation on or after 1 July 2021 must ensure that a post-construction noise assessment for the facility is conducted—</i></p> <p style="padding-left: 40px;">(a) <i>within 12 months of the commencement of operation of the facility; or</i></p> <p style="padding-left: 40px;">(b) <i>in the case of a facility that commences operation in stages as set out in the planning permit or other authorising document under the Planning and Environment Act 1987, within 12 months of each stage being completed.</i></p> <p>(2) <i>A post-construction noise assessment must—</i></p> <p style="padding-left: 40px;">(a) <i>be conducted in accordance with NZS 6808:2010 by a</i></p>	<p>Tilt Renewables support the requirement for an operator of a new wind energy facility to ensure that a post construction noise assessment is conducted for the facility. However, believe the following improvements could be made.</p> <p>Similar to Tilt Renewables comments on Regulation 131A, flexibility should be built in into these requirements to accommodate any inconsistencies between conditions of the relevant planning permit and the requirement of the proposed Regulations. For example, the planning permit associated with Tilt Renewables Dundonnell Wind Farm (Planning Permit No. 2015/23858/A) requires two rounds of post construction noise compliance testing, with the first round of testing undertaken within 6 months of the commissioning of the facility, and a repeat test undertaken 12 months later.</p> <p>Alternatively, instead of this requirement applying to a wind energy facility 'that commences operation on or after 1 July 2021, this should instead be a requirement for facilities where a planning permit has been issued on or after 1 July 2021' if the intent is to ensure consistency in the issuing of planning permit conditions henceforth.</p> <p>Further, to avoid difference in interpretation of 'commencement of operations' (e.g., either when the facility first exports energy to the NEM as part of the commissioning and testing process, or when the last turbine is commissioned / practical completion is reached), it is recommended that (a) refers to within 12 months of the 'commissioning of the last turbine', and (b) refers to within 12 months of 'the commissioning of the last turbine of that stage'. This will ensure that noise compliance monitoring occurs when the facility is operating a level indicative of its ongoing operation. Consideration could be given to a shorter time period than 12 months if this change is made.</p> <p>Tilt Renewables support the requirements sets out for a post-construction noise assessment.</p>



Regulation		Response	
	<p><i>suitably qualified and experienced acoustical engineer; and</i></p> <p>(b) <i>demonstrate whether or not the facility complies with the noise limits determined in accordance with NZS 6808:2010; and</i></p> <p>(c) <i>for the purposes of paragraph (b), use the pre-construction background sound level determined in accordance with the relevant noise standard.</i></p>		
	<p>(3) <i>The operator must—</i></p> <p>(a) <i>arrange for an environmental auditor to prepare a report verifying that the noise assessment has been conducted in accordance with NZS 6808:2010; and</i></p> <p>(b) <i>ensure that a report of the post-construction noise assessment is prepared.</i></p> <p>(4) <i>The operator must give a copy of each report prepared under subregulation (3) to the Authority within 10 business days of the report being completed. —</i></p>	<p>Tilt Renewables support the requirement for the post-construction noise assessment to be reviewed by an environment auditor. It is recommended that there are improvements made to the drafting to the requirements, including switching the order of (a) and (b) to reflect the sequences of this process, and to clarify that the operator must give a copy of the reports to the Authority within 10 days of the environmental auditors' report being finalised. This will allow the package of both reports to be provided to the Authority at the same time.</p>	
131D	Noise management plan	<p>(1) <i>This regulation applies on and from 1 January 2022.</i></p> <p>(2) <i>A noise management plan for a wind energy facility must include procedures for—</i></p> <p>(a) <i>the identification, assessment and control of risks of harm to human health and the environment from wind turbine noise at the wind energy facility; and</i></p> <p>(b) <i>assessing compliance with the noise limits determined in accordance with the relevant noise standard for the wind</i></p>	<p>Tilt Renewables support the requirement for the preparation of a Noise Management Plan. It is understood that the components which are to be required under the proposed Regulations are generally consistent with the current draft planning conditions outlined within the policy and planning guidelines for development of wind energy facilities in Victoria². Further, they are also generally consistent with many existing planning permit conditions. For example, for Tilt Renewables Dundonnell Wind Farm (Planning Permit No. 2015/23858/A) this includes:</p> <ul style="list-style-type: none"> - Noise Compliance Test Plan, including steps to address any noise mediation actions in the event of a non-compliance (which addresses

² DELWP, March 2019., Department of Wind Energy Facilities in Victoria, Policy and Planning Guidelines.



Regulation		Response	
	<p><i>energy facility; and</i></p> <p>(c) <i>addressing any complaints about wind turbine noise received by the operator, including who will investigate the complaint and respond to the complainant; and</i></p> <p>(d) <i>reducing wind turbine noise in the event non-compliance with the noise limits determined in accordance with the relevant noise standard is detected at the facility.</i></p> <p>(3) <i>An operator of a wind energy facility must prepare a noise management plan for the facility in accordance with this regulation.</i></p> <p>(4) <i>The operator must give a copy of the noise management plan to the Authority for review, on request by the Authority.</i></p> <p>(5) <i>The Authority may require the operator to make any amendments to the noise management plan.</i></p> <p>(6) <i>The operator must make any amendments required by the Authority under subregulation (5).</i></p> <p>(7) <i>The operator must implement the noise management plan.</i></p> <p><i>Note</i></p> <p><i>If the operator does not comply with this regulation, the Authority may issue a notice under Chapter 10 of the Act.</i></p>	<p>Regulation 131D (2) (b) and (d))</p> <p>- Complaints Management Plan (which addresses Regulation 131D (2) (c))</p> <p>It is Tilt Renewables' interpretation is that existing plans prepared and endorsed under the relevant planning permits would be collated and/or referenced within a Noise Management Plan, to avoid contradiction or duplication, and provided to the Authority. This should be clarified as part of a guidance document.</p> <p>Tilt Renewables does not support the inclusion of Regulation 131D (2)(a). It is not appropriate to ask operators to articulate on risks to human health when the underlying premise of the regulatory framework must be that compliance with the NZ Standard provides for protection of human health.</p> <p>Tilt Renewables supports the provision of the Noise Management Plan to the Authority, however, believes that the operator should only be required to make 'reasonable and practical' amendments to the Noise Management Plan, rather than 'any'.</p> <p>As discussed above, it is Tilt Renewables' interpretation that in many instances the Noise Management Plan will be made up of existing plans required under the relevant planning permit conditions. As such, any changes required by the Authority should not result in contradictions to, or the amendment and re-endorsement of, existing documents endorsed under the relevant planning permit, unless deemed critical in ensuring the operator is upholding its GED.</p>	
131E	Annual statement	<p>(1) <i>This regulation applies on and from 30 June 2022.</i></p> <p>(2) <i>The operator of a wind energy facility must provide a statement in accordance with this regulation to the Authority within 4 months of the end of each financial year.</i></p> <p>(3) <i>A statement under this regulation must include the following information for the previous financial year—</i></p>	<p>Tilt Renewables supports the provision of an Annual Statement on its responsible and responsive management of risks over the course of the preceding year.</p> <p>Tilt Renewables supports the inclusion of any complaints received (and how they were addressed) as part of an Annual Statement.</p>



Regulation		Response
	(a) <i>details of any complaints concerning wind turbine noise received by the operator and how the complaints (if any) were addressed;</i>	
	(b) <i>evidence that the turbine operating modes complied with any requirements contained in facility's planning permit or other authorising document under the Planning and Environment Act 1987;</i>	Tilt Renewables supports the provision of evidence that the turbine modes complied with any requirements contained in the relevant planning permit (or endorsed documents). We note that our support is based on our understanding that this applies where specific noise-reduced operating modes are required and is not applicable where they are not. This should be clarified as part of a guidance document.
	(c) <i>details of maintenance activities undertaken (including any unscheduled servicing events);</i>	<p>Tilt Renewables does not support the inclusion of details of maintenance activities undertaken as part of an Annual Statement.</p> <p>Tilt Renewables understands that this information is sought to provide confirmation that the wind energy facility has been maintained in best industry practice, to ensure noise emissions do not increase over time.</p> <p>It is submitted that a statement could be provided to that effect as part of the Annual Report.</p> <p>Detailed maintenance records could routinely number in hundreds of pages). The extent of information required needs to be carefully considered so that it provides the information needed to provide comfort to the Authority that the wind farm is being properly maintained, whilst not providing overly detailed of information which has the risk of being misunderstood.</p> <p>This should be clarified as part of a guidance document.</p>
	(d) <i>details of any noise remediation actions undertaken;</i>	Tilt Renewables supports the inclusion of details of any noise remediation actions undertaken as part of an Annual Statement.
	(e) <i>evidence demonstrating the wind energy facility has not contravened the relevant noise standard</i>	Tilt Renewables does not support the inclusion of this requirement and recommends deletion of Regulation 131E (3)(e) as it is likely to be interpreted by some third parties as necessitating annual noise monitoring campaigns. Tilt



Regulation			Response
			Renewables submit that parts (a) to (d) of Regulation 131E, alongside the facility's previous post construction noise monitoring report, are all that an operator should be reasonably expected to provide on an annual basis. The inclusion of part (e) will provide for litigants to seek annual noise monitoring testing and may necessitate operators to respond to opportunistic legal action.
131F	Wind turbine noise assessments	<p>(1) <i>An operator of a wind energy facility that has not undergone a noise assessment in accordance with subregulation (2) in the period between 1 July 2016 and 1 July 2021 must ensure that a noise assessment for the facility is conducted—</i></p> <p style="padding-left: 40px;">(a) <i>before 1 January 2024; and</i></p> <p style="padding-left: 40px;">(b) <i>within 3 months of every fifth anniversary of the day on which the test under paragraph (a) is conducted.</i></p> <p>(2) <i>An operator of a wind energy facility other than a facility described in subregulation (1) must ensure that a noise assessment for the facility is conducted within 3 months of the fifth anniversary of the facility, or each of the stages of the facility, commencing operation and every subsequent 5 years.</i></p> <p>(3) <i>A noise assessment under this regulation must—</i></p> <p style="padding-left: 40px;">(a) <i>be conducted in accordance with the relevant noise standard by suitably qualified and experienced acoustical engineer; and</i></p> <p style="padding-left: 40px;">(b) <i>demonstrate whether or not the facility complies with the noise limits determined in accordance with the relevant noise standard.</i></p> <p>(4) <i>The operator must—</i></p> <p style="padding-left: 40px;">(a) <i>arrange for an environmental auditor to prepare a report verifying that the noise assessment has been conducted in accordance with the relevant noise standard; and</i></p>	<p>Tilt Renewables does not support the requirement for mandatory five-yearly noise testing of wind energy facilities on the basis that it does not align with the risk-based and proportionate principles of the GED, nor does it contribute towards achieving the stated aim of providing greater certainty.</p> <p>The New Zealand Standard NZS 6808 (NZS6808) provides a compliance monitoring regime, which is based on noise logging over an extended period of time. This methodology inherently measures the noise from a wind energy facility as well as background noise from other sources such as wind in trees. The noise from the wind energy facility (alone) is determined from compliance monitoring by subtracting the background noise measured prior to the construction of the facility. This method relies on the assumption that the background noise has not changed over the period between pre-construction noise monitoring and post-construction compliance monitoring.</p> <p>When the time between background noise monitoring and compliance monitoring extends into many years and even decades, the assumption of consistent background noise is not valid. Therefore, the proposal to repeat compliance monitoring every five years will result in a high degree of uncertainty for all stakeholders. Furthermore, it would result in ongoing intrusion to neighbours of the wind farm for monitoring at their dwellings. It is noted that the ownership of these dwellings is likely change throughout the lifetime of the wind farm and that these neighbours do not have to consent to providing access at their properties.</p> <p>Wind energy facilities are typically designed to operate for 25-30 years. Over that time, there is no fundamental reason why the facilities would become noisier. Wind energy facilities are monitored 24 hours a day and are subject to a continuous maintenance program (typically involving a crew of wind turbine</p>



Regulation		Response
	<p>(b) <i>prepare a report of the noise assessment.</i></p> <p>(5) <i>The operator must give a copy of each report prepared under subregulation (4) to the Authority on request.</i></p>	<p>technicians on site daily) to maintain the efficiency, productivity and optimal performance of the facility. This means that operators are responsive to any unexpected mechanical failures or maintenance issues, including any which could produce increased noise emissions.</p> <p>Careful consideration should be given not to set a dangerous and unnecessary precedent. It is Tilt Renewables understanding that there is no jurisdiction within Australia or New Zealand (nor are we aware of any jurisdiction internationally) that requires such a measure.</p> <p>Tilt Renewables submits that there are ways of demonstrating appropriate noise management without the need for a five-yearly noise assessment, including (as identified within the draft Regulations):</p> <ul style="list-style-type: none"> • Compliance with the NZ Standard; • Post-Construction Noise Assessment, which confirms that the wind energy facility operates in compliance with the relevant standards; • Noise Management Plan provision and implementation, including monitoring requirements, complaints investigation procedures and non-compliance action plans; and • Annual Statement, including a statement confirming ongoing maintenance of the wind energy facility. <p>These requirements place the onus on the operator to demonstrate that they are actively managing their risks and are regularly reporting on their performance. It is understood that this is further backed up by the powers of the Authority to investigate compliance or request further follow-up action any time under under Part 10 of the new Environment Protection Act (Notices), including section 273 (notice to investigate).</p> <p>Although ongoing noise testing is strongly opposed, Tilt Renewables submits that Regulation 131F should be reframed to set out the requirements should the Authority require ongoing noise assessments under this provision.</p>



Regulation		Response
		<p>It is considered essential that provision for the option of an alternate testing methodology will be required to avoid the potential for false results associated with changes in background noise over time.</p> <p>Under the relevant NZ Standards noise limits are calculated based on 'background noise levels' plus 5 dbA. Therefore, for a noise assessment to be undertaken post-construction which complies strictly with the NZ Standard it must either:</p> <ul style="list-style-type: none"> • Turn turbines off and measure for a minimum of two weeks, but typically between 4-6 weeks to ensure background noise levels at receivers across a full range of wind speeds and directions are established, or • Involve an 'attended on/off test' which involves turning wind turbines on and off repeatedly over several weeks to re-establish background noise levels at receivers. <p>Either approach is not commercially viable for WEF owners. Revenue losses are likely to be significant. Were a 100 MW wind energy facility to be required to turn off for a full six weeks, we estimate that it could cost the wind energy facility in excess of \$2 million in lost electricity generation revenue³. If attended on-off tests are undertaken to reduce lost revenue, this is also extremely labour intensive and costly.</p> <p>The Regulatory Impact Statement advises that the highly resource-intensive assessment option of 'an attended on/off test' will not be required for the proposed periodic testing regime, on the basis that background noise levels are "unlikely" to change over the 25 years post-construction, allowing the wind energy facility to run a simpler, less costly two-week test every five years. This is incorrect.</p> <p>Under the proposed scenario this would mean operators would be commonly required to conduct on/off background noise testing at dwellings in order to</p>

³ Assumes the wind energy facility operates at 35 per cent capacity and earns \$55/MWh of electricity. The revenue losses would be significantly higher were the wind energy facility exposed to higher electricity market prices.



Regulation			Response
			<p>confirm that increased noise readings recorded at those locations are occurring at the receiver location as opposed to the wind energy facility.</p> <p>No other testing methodology is explicitly allowed for within the NZ Standard. Alternate test methods are not excluded under the NZ Standard however they are also not explicitly allowed. As such, if a periodic testing regime is adopted, it is submitted that the findings of an assessment where background noise levels have not been re-established may result in exposure to legal action.</p> <p>It is recommended an alternative testing methodology such as intermediate testing should be explicitly allowed. Intermediate testing involves measuring noise closer to turbines to achieve a higher signal (wind energy facility noise) to noise (background noise) ratio, so that any change in background noise does not provide false results. An assessment of the change in noise at a specified location (closer to turbines) could be used to determine if any change in noise from the turbines results in a change to the compliance status.</p> <p>An example of how this is addressed is within the NSW Wind Energy: Noise Assessment Bulletin⁴, and could be adopted by the Victorian government through the establishment of a similar guidance document. It is suggested that this document could also provide a risk-based framework on the triggers where the Authority might invoke their powers under Part 10 of the new Environment Protection Act (Notices), including section 273 (notice to investigate).</p> <p>It is also noted that in a reframing of this regulation that Tilt Renewables comments on Regulation 131C (3) and (4) also apply to Regulation 131F (4) and (5).</p>
131G	Unreasonable noise	<i>For the purposes of paragraph (b) of the definition of unreasonable noise in section 3(1) of the Act, wind turbine noise is unreasonable noise if it exceeds the noise limits determined in accordance with the relevant noise standard."</i>	Tilt Renewables supports the inclusion of Regulation 131G.

⁴ Department of Planning and Environment, December 2016., Wind Energy: Noise Assessment Bulletin, For State significant wind energy development



3.0 Conclusion

Tilt Renewables appreciates the opportunity to provide comment on the proposed changes to how wind farm noise is managed within Victoria.

Tilt Renewables supports the stated aim to provide clear and consistent wind farm noise regulation to provide certainty to industry and confidence for communities. Tilt Renewables agrees that this aim is best achieved with new wind farm regulations under the new EP Act (Option 1), and supports the EPA being the primary regulator for wind farm noise within Victoria.

Whilst Tilt Renewables supports the proposed framework there are a number of concerns relating to the specific requirements / drafting of the proposed Regulations.

We would be willing to provide any further information that would assist DELWP and the EPA with its analysis. Please do not hesitate to contact the undersigned should you wish to discuss any aspect of the above submission further.

Regards,

A handwritten signature in black ink, appearing to read "Cara Layton", written over a light grey rectangular background.

Cara Layton

**Stakeholders and Environment
Manager**

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