Title of Proposal - Kentbruck Green Power Hub

Section 1 - Summary of your proposed action

Provide a summary of your proposed action, including any consultations undertaken.

1.1 Project Industry Type

Energy Generation and Supply (renewable)

1.2 Provide a detailed description of the proposed action, including all proposed activities.

Neoen Australia Pty Ltd (Neoen) is proposing a 900 megawatt (MW) wind farm and battery storage facility to be located in an actively managed and harvested pine plantation in Victoria's south west, between Portland and Nelson. The proposed Kentbruck Green Power Hub (the project) would comprise of three elements:

1. A wind farm, consisting of up to 157 wind turbines and associated infrastructure
2. A battery storage facility, comprising a lithium-ion battery with 500 megawatts (MW) / 1,000 MW hours of storage
3. A connection to the electricity grid via an underground and/or overhead transmission line.

The proposed development will comprise the use and development of the land for the project. The project is in the early stages of development and indicatively consists of the three elements listed above which include (but is not limited to):

• Internal site access tracks and upgrades to existing access points from the public road network
• Hardstand and lay down areas
• Underground electricity cabling
• Overhead power lines (up to 275 kV)
• Electricity collector stations
• Overhead and/or underground electricity cabling and a terminal station to provide a connection to the existing 500 kV transmission line east of the wind farm site
• Permanent meteorological monitoring masts (met masts)
• An operations and maintenance building
• Temporary infrastructure including construction compounds, concrete batching plants, car parking, site buildings and amenities.

1.3 What is the extent and location of your proposed action? Use the polygon tool on the map below to mark the location of your proposed action.

Area	Point	Latitude	Longitude

Area	Point	Latitude	Longitude
Transmission development envelope	1	-38.179654653514	141.64148958158
Transmission development envelope	2	-38.184782145459	141.64068878503
Transmission development envelope	3	-38.184332834878	141.63496644926
Transmission development envelope	4	-38.197015178863	141.63359315824
Transmission development envelope	5	-38.19683507509	141.6309615864
Transmission development envelope	6	-38.194766241744	141.63084657621
Transmission development envelope	7	-38.194316992748	141.62501008939
Transmission development envelope	8	-38.200792471467	141.62398012113
Transmission development envelope	9	-38.200971882062	141.62100522654
Transmission development envelope	10	-38.20007277447	141.61780031156
Transmission development envelope	11	-38.199443460889	141.61551206247
Transmission development envelope	12	-38.200612377036	141.61093385648
Transmission development envelope	13	-38.201601865816	141.60658567087
Transmission development envelope	14	-38.201871661933	141.59456937448
Transmission development envelope	15	-38.202590657774	141.58987701745
Transmission development envelope	16	-38.204029994876	141.58644378991
Transmission development envelope	17	-38.203490417639	141.58426969711
Transmission development envelope	18	-38.202770747311	141.57854736657
Transmission development envelope	19	-38.203310329882	141.57808988754
Transmission development envelope	20	-38.200522671351	141.57099426599
Transmission development envelope	21	-38.198094425317	141.57133758874
Transmission development envelope	22	-38.197374701651	141.57122343246
Transmission development envelope	23	-38.195305883636	141.5772882266
Transmission development envelope	24	-38.194047168638	141.59205110502

Area	Point	Latitude	Longitude
Transmission development envelope	25	-38.177765483536	141.59502685876
Transmission development envelope	26	-38.179745060257	141.64137543054
Transmission development envelope	27	-38.179654653514	141.64148958158
Overhead line development envelope	1	-38.185581808759	141.2987946166
Overhead line development envelope	2	-38.185581808758	141.2987946166
Overhead line development envelope	3	-38.18590226202	141.30381571188
Overhead line development envelope	4	-38.192682047958	141.31220566168
Overhead line development envelope	5	-38.196594473044	141.30671249761
Overhead line development envelope	6	-38.200304337147	141.30954491033
Overhead line development envelope	7	-38.200574138072	141.31821380987
Overhead line development envelope	8	-38.201990576526	141.32585274114
Overhead line development envelope	9	-38.209544449538	141.32456528082
Overhead line development envelope	10	-38.210218864367	141.33100258245
Overhead line development envelope	11	-38.197673725733	141.33400665655
Overhead line development envelope	12	-38.198955317525	141.34430633917
Overhead line development envelope	13	-38.198415702678	141.34464966192
Overhead line development envelope	14	-38.193491532462	141.34276138677
Overhead line development envelope	15	-38.189309099009	141.34319054022
Overhead line development envelope	16	-38.174196370392	141.34722458257
Overhead line development envelope	17	-38.175343428471	141.35812508001
Overhead line development envelope	18	-38.188465837366	141.35550724401
Overhead line development envelope	19	-38.189747591206	141.36709438696
Overhead line development envelope	20	-38.199056494864	141.37147175207
Overhead line	21	-38.201889403265	141.37507664099

Area	Point	Latitude	Longitude
development envelope			
Overhead line development envelope	22	-38.211399075281	141.40588985815
Overhead line development envelope	23	-38.220435484509	141.43215404882
Overhead line development envelope	24	-38.22670636258	141.43893467321
Overhead line development envelope	25	-38.236954375881	141.45335422888
Overhead line development envelope	26	-38.246526873049	141.48262249365
Overhead line development envelope	27	-38.250840825908	141.48948894872
Overhead line development envelope	28	-38.266813702788	141.49893032446
Overhead line development envelope	29	-38.274091317389	141.51502357855
Overhead line development envelope	30	-38.289452775437	141.5303014411
Overhead line development envelope	31	-38.289991714936	141.5354512824
Overhead line development envelope	32	-38.292821081649	141.5354512824
Overhead line development envelope	33	-38.293764179373	141.54042946234
Overhead line development envelope	34	-38.30427215335	141.53905617132
Overhead line development envelope	35	-38.304204799389	141.53742538824
Overhead line development envelope	36	-38.314879621531	141.53549419775
Overhead line development envelope	37	-38.330501764547	141.53313385381
Overhead line development envelope	38	-38.332083992107	141.5321468009
Overhead line development envelope	39	-38.337873977149	141.5313743247
Overhead line development envelope	40	-38.33688096026	141.51804911031
Overhead line development envelope	41	-38.323886332638	141.50491701498
Overhead line development envelope	42	-38.314997473574	141.50663362875
Overhead line development envelope	43	-38.312909780466	141.49075495138
Overhead line development envelope	44	-38.275253646623	141.45195948019
Overhead line	45	-38.26042834315	141.45419107809

Area	Point	Latitude	Longitude
development envelope			
Overhead line development envelope	46	-38.258743458106	141.44105898275
Overhead line development envelope	47	-38.259282625571	141.4362524642
Overhead line development envelope	48	-38.254969173821	141.432862152
Overhead line development envelope	49	-38.253823370159	141.42608152761
Overhead line development envelope	50	-38.252003527208	141.42251955404
Overhead line development envelope	51	-38.249745510568	141.41612516775
Overhead line development envelope	52	-38.247285203624	141.40805708303
Overhead line development envelope	53	-38.246139278812	141.40513883962
Overhead line development envelope	54	-38.246206686654	141.40260683431
Overhead line development envelope	55	-38.242903628887	141.36501299276
Overhead line development envelope	56	-38.238589204958	141.36346804037
Overhead line development envelope	57	-38.234341943847	141.36115061178
Overhead line development envelope	58	-38.22948762738	141.35531412496
Overhead line development envelope	59	-38.228341422043	141.34776102438
Overhead line development envelope	60	-38.228273997637	141.34304033651
Overhead line development envelope	61	-38.225172407403	141.33746134176
Overhead line development envelope	62	-38.224498131157	141.33377062216
Overhead line development envelope	63	-38.223082130697	141.33316980734
Overhead line development envelope	64	-38.220115183218	141.3319681777
Overhead line development envelope	65	-38.216608634751	141.3245009078
Overhead line development envelope	66	-38.214383237499	141.32106768026
Overhead line development envelope	67	-38.213708861259	141.3178061141
Overhead line development envelope	68	-38.212022893318	141.31540285482
Overhead line	69	-38.210943853339	141.31265627279

Area	Point	Latitude	Longitude
development envelope			
Overhead line development envelope	70	-38.205548413477	141.31239878072
Overhead line development envelope	71	-38.204873955374	141.30922304525
Overhead line development envelope	72	-38.204469277513	141.3081072463
Overhead line development envelope	73	-38.202917991539	141.30518900289
Overhead line development envelope	74	-38.200894525373	141.30321489706
Overhead line development envelope	75	-38.198601195733	141.30261408224
Overhead line development envelope	76	-38.196510155755	141.30106912985
Overhead line development envelope	77	-38.194553967221	141.29832254781
Overhead line development envelope	78	-38.185581808759	141.2987946166
Underground cable beneath boiler swamp road	1	-38.173757784591	141.36503445043
Underground cable beneath boiler swamp road	2	-38.17389273435	141.36507736578
Underground cable beneath boiler swamp road	3	-38.189072986733	141.37820946112
Underground cable beneath boiler swamp road	4	-38.199123946345	141.46095024481
Underground cable beneath boiler swamp road	5	-38.201889403265	141.57330261602
Underground cable beneath boiler swamp road	6	-38.203339539911	141.57733665838
Underground cable beneath boiler swamp road	7	-38.202091749647	141.52266250982
Underground cable beneath boiler swamp road	8	-38.200742763143	141.46052109136
Underground cable beneath boiler swamp road	9	-38.197505093555	141.43914924993
Underground cable	10	-38.190084891099	141.37726532354

Area	Point	Latitude	Longitude
beneath boiler swamp road			
Underground cable beneath boiler swamp road	11	-38.175883214261	141.36464821234
Underground cable beneath boiler swamp road	12	-38.173757784591	141.36503445043
Underground cable underneath Cutout Dam Road	1	-38.169776654299	141.36550651922
Underground cable underneath Cutout Dam Road	2	-38.169793523954	141.36554943456
Underground cable underneath Cutout Dam Road	3	-38.181044713953	141.59364448919
Underground cable underneath Cutout Dam Road	4	-38.183001265323	141.5935586585
Underground cable underneath Cutout Dam Road	5	-38.171396123367	141.36533485784
Underground cable underneath Cutout Dam Road	6	-38.169776654299	141.36550651922
Wind farm site	1	-38.036200756275	141.06458052129
Wind farm site	2	-38.036183472163	141.06475486124
Wind farm site	3	-38.036724287133	141.06870307291
Wind farm site	4	-38.038549508172	141.06844558085
Wind farm site	5	-38.03922550442	141.0762561735
Wind farm site	6	-38.037738304437	141.07659949625
Wind farm site	7	-38.040983065462	141.10990180338
Wind farm site	8	-38.05916458637	141.10672606791
Wind farm site	9	-38.064435706968	141.1268962797
Wind farm site	10	-38.072882223737	141.15530623759
Wind farm site	11	-38.084840823218	141.18998183573
Wind farm site	12	-38.104092085457	141.20431556071
Wind farm site	13	-38.120029643224	141.23504294718
Wind farm site	14	-38.128402220548	141.24113692606
Wind farm site	15	-38.131507932485	141.24989165629
Wind farm site	16	-38.13967667422	141.26422538126
Wind farm site	17	-38.15162434353	141.26825942362
Wind farm site	18	-38.158711019258	141.27675666178
Wind farm site	19	-38.162422812658	141.31786956156
Wind farm site	20	-38.164447347596	141.3176120695

Area	Point	Latitude	Longitude
Wind farm site	21	-38.167888927964	141.34619368876
Wind farm site	22	-38.141364316801	141.35168685282
Wind farm site	23	-38.14251189146	141.36284484232
Wind farm site	24	-38.157057523184	141.3603986677
Wind farm site	25	-38.157327484288	141.36280192698
Wind farm site	26	-38.169137304213	141.36048449839
Wind farm site	27	-38.169727744992	141.36516227091
Wind farm site	28	-38.175682494601	141.3643254217
Wind farm site	29	-38.173843827805	141.34679450358
Wind farm site	30	-38.179224749388	141.34542121256
Wind farm site	31	-38.178313900318	141.33904828394
Wind farm site	32	-38.176154805188	141.33947743738
Wind farm site	33	-38.172781090979	141.31604565943
Wind farm site	34	-38.170115746328	141.294673818
Wind farm site	35	-38.175108970487	141.29626168574
Wind farm site	36	-38.182901765054	141.30325688685
Wind farm site	37	-38.185397981858	141.30368604029
Wind farm site	38	-38.18497671242	141.2879119727
Wind farm site	39	-38.179849225933	141.28851278752
Wind farm site	40	-38.178972119734	141.27864225835
Wind farm site	41	-38.17472137859	141.27967222661
Wind farm site	42	-38.173979160265	141.2737499091
Wind farm site	43	-38.172494700938	141.27400740117
Wind farm site	44	-38.171145166221	141.2633643958
Wind farm site	45	-38.159403159838	141.26525267095
Wind farm site	46	-38.148874235932	141.25357969731
Wind farm site	47	-38.140909040186	141.22079237431
Wind farm site	48	-38.155083785199	141.21650083989
Wind farm site	49	-38.143204185775	141.18560179204
Wind farm site	50	-38.133078000125	141.18920668096
Wind farm site	51	-38.122275186666	141.17976530522
Wind farm site	52	-38.103974274654	141.14071234197
Wind farm site	53	-38.104919821549	141.13358839482
Wind farm site	54	-38.095531349271	141.11710890264
Wind farm site	55	-38.089451838977	141.11316069097
Wind farm site	56	-38.081750400041	141.09444960088
Wind farm site	57	-38.086344338443	141.08912809819
Wind farm site	58	-38.068777721811	141.04106291265
Wind farm site	59	-38.063439337102	141.04132040471
Wind farm site	60	-38.064250256072	141.05050428838
Wind farm site	61	-38.059317026708	141.05162008733
Wind farm site	62	-38.059992831212	141.06466635198
Wind farm site	63	-38.052355877121	141.06621130437
Wind farm site	64	-38.051950352854	141.06252058476
Wind farm site	65	-38.036200756275	141.06458052129

1.5 Provide a brief physical description of the property on which the proposed action will take place and the location of the proposed action (e.g. proximity to major towns, or for off-shore actions, shortest distance to mainland).

The Kentbruck Green Power Hub is surrounded by varied land uses, some of which are recognised for their environmental significance. These land uses can be summarised as follows:

- Very few adjacent dwellings with the nearest township being Nelson, which is around three kilometres from the indicative wind farm site boundary and about five kilometres from the nearest turbine in the indicative wind farm layout

- Discovery Bay Coastal Park, which extends generally north-west to south-east south of the wind farm site.

- Plantations north of Portland-Nelson Road to the north of the wind farm site.

- The Ramsar Glenelg Estuary and Discovery Bay site to the north-west and south of the wind farm site.

- The Lower Glenelg National Park north of the wind farm site.

- The Cobboboonee National Park to the east and north-east of the wind farm site, and north and south from option one of the transmission line route options.

- Freehold agricultural land generally used for grazing at the eastern and western ends of the wind farm site and along sections of both transmission line route options.

- The Glenelg River north-west of the proposed wind farm site.

There is a network of roads around and within the Project site of which many are used by vehicles associated with the plantation. Portland Airport is located 30 kilometres to the east of the wind farm site. There are also two private airstrips located nearby:
- Nelson Aerodrome which is around one kilometre east of Nelson and about two kilometres from the closest point of the wind farm site boundary.
- An airfield in the plantation to the north of the Project site. This is located about two kilometres from the northern edge of the wind farm site.

1.6 What is the size of the proposed action area development footprint (or work area) including disturbance footprint and avoidance footprint (if relevant)?

7,500

1.7 Is the proposed action a street address or lot?

Lot

1.7.2 Describe the lot number and title. More than 50 lots

1.8 Primary Jurisdiction.

Victoria

1.9 Has the person proposing to take the action received any Australian Government grant funding to undertake this project?

No

1.10 Is the proposed action subject to local government planning approval?

Yes

1.10.1 Is there a local government area and council contact for the proposal?

No

1.11 Provide an estimated start and estimated end date for the proposed action.

Start date 06/2021

End date 06/2023

1.12 Provide details of the context, planning framework and State and/or Local government requirements.

The State Planning Policy Framework (SPPF) comprises general principles for land use and development of land and outlines specific policies in relation to settlement, environment, housing, economic development, infrastructure, and particular uses. The SPPF is the same in all Victorian planning schemes. The policies outlined in the SPPF must be taken into account when responsible authorities are assessing planning permit applications.

The Local Planning Policy Framework (LPPF) consists of the Municipal Strategic Statement (MSS) and Local Planning Policies (LPP). The LPPF is specific to each planning scheme. The MSS is a statement of the key strategic planning, land use and development objectives for a municipality and the strategies and actions for achieving those objectives. LPPs are policy statements of intent explaining the expectations of what the responsible authority will do in specified circumstances. The LPPF must be consistent with the SPPF and demonstrates how State polices are to be considered in each local municipality. Responsible authorities must take into account the LPPF when assessing planning permit applications.

Relevant clauses of the State Planning Policy:

11.01-1R Settlement – Great South Coast

11.03-4S Coastal settlement

11.03-5S Distinctive areas and landscapes

11.03-6S Regional and local places

12 Environmental and landscape values

12.01-1S Protection of biodiversity

12.01-2S Native vegetation management

12.02-1S Protection of coastal areas

12.02-2S Coastal Crown land

12.03 Water bodies and wetlands

12.03-1S River corridors, waterways, lakes and wetlands

12.05-1S Environmentally sensitive areas

12.05-2S Landscapes

13.04-2S Erosion and landslip

13.04-3S Salinity

13.05-1S Noise abatement

13.07-1S Land use compatibility

14.01-1S Protection of agricultural land

14.01-3S Forestry and timber production

14.02-1S Catchment planning and management

15.03-1S Heritage conservation

15.03-2S Aboriginal cultural heritage

19.01-2S Renewable energy

19.01-2R Renewable energy – Great South Coast

Local Planning Policy

The Glenelg Shire Council Municipal Strategic Statement (MSS) and Local Planning Policy Framework (LPPF) at Clause 21 and Clause 22 of the Planning Scheme covers key matters relating to the environment, landscape and heritage, environmental risk, natural resource

management, economic development, transport and infrastructure.

Relevant clauses of the Local Planning Policy:

Municipal Strategic Statement

21.02-17 Environmental and Landscape Values

21.02-22 Coastal Management

21.02-26 Significant Landscapes

21.02-30 Environmental Risks

21.02-39 Floodplains

21.02-43 Soil degradation

21.02-47 Noise and air

21.02-51 Natural Resources Management

21.02-56 Water

21.02-65 Heritage

21.02-90 Transport

Local Planning Policy

22.02 Heritage

Planning Permit requirements for the Project

Under Clause 53.32-2 a permit is required to use and develop land for a Wind Energy Facility. An assessment of the relevant zones and overlays that will apply to Project has been undertaken to identify additional permit triggers.

Zones and Overlays

The proposed Kentbruck Green Power Hub is affected by the zones and overlays under the Planning Scheme as outlined below:

Zones

Clause 35.07 – Farming Zone

The use of the land for a wind energy facility and utility installation is classified as a Section 2 use, which requires a permit. A permit is required to construct or carry out buildings and works

associated with a Section 2 use of this clause.

Clause 36.02 – Public Park and Recreation Zone

The indicative site area for the wind energy facility does include Public Park and Recreation Zone. A wind energy facility is a Section 2 use under this clause and therefore requires a permit. However, the use must be conducted by or on behalf of a public land manager or Parks Victoria under the relevant provisions of several Acts.

Neoen will seek to rezone the land currently within the wind farm site area zoned Public Park and Recreation Zone to a more suitable zone (ie Farming Zone) via a planning scheme amendment. It should be noted that the section of land zoned Public Park and Recreation Zone within the wind farm site area is freehold land used for forestry purposes.

Clause 36.04 – Road Zone

The indicative site boundary for the wind energy facility does include Road Zone Category 1. No buildings and works for the wind energy facility are occurring within this zone, however, a permit is still required for the use of this land for a wind energy facility as it is classified as a Section 2 use.

A utility installation is also classified as a Section 2 use under this clause and therefore requires a permit. A permit is also required to construct a building or construct or carry out works for a Section 2 use. As a result, a permit will be required for both the use and development of a utility installation.

Clause 36.03 – Public Conservation and Resource Zone

The indicative site area for the wind energy facility does not include any land within this zone.

However, the location of the utility installation (transmission line route option 1) is located within this zone where the transmission line will be located below one of the existing roads that bisect the Cobboboonee National Park.

Cobboboonee National Park is identified as a National Park pursuant to Part 45 of Schedule Two of the National Parks Act 1975 (Vic). This land is Crown land.

Section 27 of the National Parks Act 1975 allows for the construction of infrastructure within national parks. Section 27(1) provides that a public authority — including distribution, transmission and generation companies within the meaning of the Electricity Industry Act 2000 (Vic) — may, with the consent of Parks Victoria, and subject to any conditions, perform its functions and exercise its powers in a national park. This includes construction and operation of a transmission line.

Neoen has commenced discussions with Parks Victoria and DELWP on this matter.

Clause 35.06 – Rural Conservation Zone

The indicative site area for the wind energy facility does not include any land within this zone.

However, the location of the utility installation may be located within this zone (dependent on the selection of the route for the transmission line). A utility installation is classified as a Section 2 use and therefore a planning permit is required for the use of the land. A permit is also required under this zone to construct or carry out buildings or works associated with a Section 2 use.

Overlays

Clause 44.06 – Bushfire Management Overlay

Buildings and works for both the wind energy facility and the utility installation are both within this overlay, however, buildings and works associated with these land uses do not require a planning permit under this overlay.

Clause 42.01 – Environmental Significance Overlay Schedule 1

A permit is required to construct a building or construct or carry out works for the wind energy facility. A permit is also required to remove, destroy or lop any vegetation, including dead vegetation.

Clause 42.01 – Environmental Significance Overlay Schedule 3

Buildings and works for both the wind energy facility and the utility installation are both within this overlay, however, a permit is not required to construct a building or construct or carry out works. A permit will be required to remove, destroy or lop vegetation.

Clause 42.03 - Significant Landscape Overlay Schedule 1

Buildings and works for the wind energy facility will occur within this overlay. A permit is required to construct a building or construct or carry out works.

Clause 43.02 – Design and Development Overlay Schedule 1

Buildings and works for the utility installation are within this overlay. A permit is required to construct a building or construct or carry out works.

Clause 45.02 – Airport Environs Overlay Schedule 2

Buildings and works for the utility installation are within this overlay, however, buildings and works associated with these land uses do not require a planning permit under this overlay. Schedule 2 of this overlay identifies that the use of land for a utility installation does not trigger the requirement for the application to be referred to the airport owner.

Planning assessment

The zones and overlays identified within the wind farm site and the transmission line development envelopes (for options 1 and 2) that apply to the Project have been listed above. This analysis has identified that the key planning approvals that will be required for the Project include:

- Use and development of the land for the purpose of a wind energy facility including associated ancillary temporary and permanent infrastructure.

- Use and development of the land for the purpose of a utility installation.

- A planning scheme amendment to rezone the section of land within the wind energy facility site area that is currently zoned Public Park and Recreation Zone.

- Removal of vegetation pursuant to clause 42.01 and clause 52.17 of the Glenelg Planning Scheme.

- To create or alter access to a road in a Road Zone under clause 52.29 of the Glenelg Planning Scheme.

- A permit for buildings and works associated with the utility installation (for the transmission line) under particular overlays, dependent on the transmission line route selected.

Key other approvals that are also likely to be required include:

- If the option one transmission line route is selected, approval from Parks Victoria pursuant to the National Parks Act 1975 to allow for the construction and operation of infrastructure within national parks.

- A Cultural Heritage Management Plan which will need to be prepared in conjunction with and assessed by the Gundtij Mirring Traditional Owner Aboriginal Corporation (recognised as a Registered Aboriginal Party pursuant to the Aboriginal Heritage Act 2006). Pursuant to Section 52 of the Aboriginal Heritage Act 2006 a planning permit cannot be granted prior to the approval of the CHMP.

- A permit to ‘Take’ listed flora under the Flora and Fauna Guarantee Act 1988 (Vic).

- Consents under the Road Management Act 2004 (Vic).

1.13 Describe any public consultation that has been, is being or will be undertaken, including with Indigenous stakeholders.

Neoen conducted three community drop-in sessions in April 2019, at Nelson, Mt Richmond and Portland. These sessions were widely advertised and promoted in the local media and were well attended. The purpose of these drop-in sessions was to introduce the Project to the community and to seek input and feedback on the Project and the existing environment, to assist with detailed design, and to inform on environmental and planning assessments. Seven Project team members were on hand to answer questions on a range of key topics – biodiversity, transmission, the planning process and other topics. Community members were encouraged to complete feedback surveys and provide input on the Project’s proposed community benefit-sharing program.

As part of its efforts to inform the community, Neoen has also proactively reached out to local council, State and Federal Members of Parliament, as well as many local organisations active in

the region. This outreach to local groups includes both government and non-government organisations.

Neoen is continuing to consult with key Project stakeholders and the community, and has developed a detailed Community Relations Plan which outlines future consultation and engagement.

Neoen will continue to hold face-to-face meetings with near neighbours, and keep them updated through the Project website and newsletters, as well as hosting further community sessions as the project progresses

The Gunditj Mirring Traditional Owner Aboriginal Corporation (GMTOAC) is the recognised Registered Aboriginal Party (RAP) pursuant to the Aboriginal Heritage Act 2006. Therefore, the GMTOAC are recognised as the primary guardians, keepers and knowledge holders of Aboriginal cultural heritage of the study area. A preliminary meeting has been held with a RAP representative to present the Project. Consultation with CMTOAC will continue as the Project develops and investigations are undertaken.

Appropriate consultation will also be undertaken with the Gunditj Mirring Traditional Owners Aboriginal Corporation Registered Native Title Body Corporate prior to the commencement of the project**.**

1.14 Describe any environmental impact assessments that have been or will be carried out under Commonwealth, State or Territory legislation including relevant impacts of the project.

A preliminary flora and fauna assessment has been undertaken to accompany this referral under the EPBC Act.

The Project has been referred under the Environmental Effects Act 1978 (EE Act) for a decision as to whether an Environment Effects Statement is required. In addition, Neoen has engaged suitably qualified consultants to undertake a range of preliminary investigations in relation to the Project. The following preliminary investigations have been undertaken and accompany the referral submitted under the EE Act:

Preliminary Landscape and Visual Impact Assessment, prepared by Green Bean (dated July 2019)

Preliminary Flora and Fauna Assessment, prepared by Biosis (dated July 2019)

Preliminary Cultural Heritage Due Diligence Assessment, prepared by Biosis (dated July 2019)

Preliminary Noise Assessment, prepared by AECOM (dated July 2019)

Preliminary Hydrology Technical Memorandum, prepared by AECOM (dated March 2019)

Neoen have entered into discussions with DELWP Environment, including members of the DELWP Environment Barwon South West Region to procure feedback on a draft ecological

study program. This process is ongoing and Neoen have submitted an updated draft study program for further review and comment to DELWP in July 2019.

Pending the outcomes of these referrals, environmental impact assessments will be carried out as required to satisfy relevant Commonwealth and State legislation to inform application documents

1.15 Is this action part of a staged development (or a component of a larger project)?

No

1.16 Is the proposed action related to other actions or proposals in the region?

No

Section 2 - Matters of National Environmental Significance

Describe the affected area and the likely impacts of the proposal, emphasising the relevant matters protected by the EPBC Act. Refer to relevant maps as appropriate. The interactive map tool can help determine whether matters of national environmental significance or other matters protected by the EPBC Act are likely to occur in your area of interest. Consideration of likely impacts should include both direct and indirect impacts.

Your assessment of likely impacts should consider whether a bioregional plan is relevant to your proposal. The following resources can assist you in your assessment of likely impacts:

• Profiles of relevant species/communities (where available), that will assist in the identification of whether there is likely to be a significant impact on them if the proposal proceeds;

• Significant Impact Guidelines 1.1 – Matters of National Environmental Significance;

• Significant Impact Guideline 1.2 – Actions on, or impacting upon, Commonwealth land and Actions by Commonwealth Agencies.

2.1 Is the proposed action likely to have ANY direct or indirect impact on the values of any World Heritage properties?

No

2.2 Is the proposed action likely to have ANY direct or indirect impact on the values of any National Heritage places?

No

2.3 Is the proposed action likely to have ANY direct or indirect impact on the ecological character of a Ramsar wetland?

Yes

2.3.1 Impact table

Wetlands	Impact
Glenelg Estuary and Discovery Bay Ramsar Site	The Glenelg Estuary and Discovery Bay Ramsar Site adjacent to the Project site supports migratory bird species. The ecological character description for the Ramsar site sets out specific parameters for Limits of Acceptable Change (LAC) for the Ramsar wetlands. These LAC relate to hydrology, vegetation types, fish diversity and threatened species. LAC are also

Wetlands	Impact
	in place for waterbirds, including the presence of a range of waterbird guilds, Sanderling abundance and the ongoing presence of Hooded Plover. There are no effects associated with the development or operation of the Project that will impact the hydrology of the Ramsar site, or influence vegetation and aquatic species to an extent that will approach or meet the specified limits. There is a low possibility of impacts on bird species through collision with turbines, however these are highly unlikely to be of such a scale that would exceed the LAC.

2.3.2 Do you consider this impact to be significant?

No

2.4 Is the proposed action likely to have ANY direct or indirect impact on the members of any listed species or any threatened ecological community, or their habitat?

Yes

2.4.1 Impact table

Species	Impact
Common Bent-wing Bat (southern ssp.) Miniopterus schreibersii bassanii	The potential risk to the species is collision with turbines. Southern Bent-wing Bats are likely to fly through the site and it is likely that such collisions will occur at an as yet uncertain frequency. As the project entails minimal reduction in habitat for the species, the potential for the development to lead to a long-term decrease in the size of the population will be a function of density-dependence. As resources for the population are expected to remain stable, mortality of a small number of individuals can be expected to result in improved survivorship of others. It is thus unlikely that a small number of collisions may lead to a long-term decrease in the population.

2.4.2 Do you consider this impact to be significant?

No

2.5 Is the proposed action likely to have ANY direct or indirect impact on the members of any listed migratory species, or their habitat?

Yes

2.5.1 Impact table

Species	Impact
The preliminary ecology assessment has identified 37 EPBC listed migratory bird species, including shorebirds.	The project has no realistic capacity to substantially modify, destroy or isolate an area of important habitat for a migratory species Field surveys have been completed in November 2018 and February 2019 for listed shorebirds, with further investigations planned. As all field assessments have not yet been completed, specific measures to manage potential effects on migratory species have not yet been proposed. The ecological character description for the Ramsar site sets out specific parameters for Limits of Acceptable Change (LAC) for the Ramsar wetlands, with LAC in place for waterbirds. There are no effects associated with the development or operation of the Project that will impact these species to an extent that will approach or meet the specified limits. There is a low possibility of impacts on bird species through collision with turbines, however these are highly unlikely to be of such a scale that would exceed the LAC. The project does not include any known mechanism that would seriously disrupt any part of the lifecycle of an ecologically significant proportion of the population of any migratory species.

2.5.2 Do you consider this impact to be significant?

No

2.6 Is the proposed action to be undertaken in a marine environment (outside Commonwealth marine areas)?

No

2.7 Is the proposed action to be taken on or near Commonwealth land?

No

2.8 Is the proposed action taking place in the Great Barrier Reef Marine Park?

No

2.9 Is the proposed action likely to have ANY direct or indirect impact on a water resource related to coal/gas/mining?

No

2.10 Is the proposed action a nuclear action?

No

2.11 Is the proposed action to be taken by the Commonwealth agency?

No

2.12 Is the proposed action to be undertaken in a Commonwealth Heritage Place Overseas?

No

2.13 Is the proposed action likely to have ANY direct or indirect impact on any part of the environment in the Commonwealth marine area?

No

Section 3 - Description of the project area

Provide a description of the project area and the affected area, including information about the following features (where relevant to the project area and/or affected area, and to the extent not otherwise addressed in Section 2).

3.1 Describe the flora and fauna relevant to the project area.

The wind farm is located primarily within an area that has been substantially modified for commercial forestry use (radiata pine). Small sections of grazing also exist within the wind farm site boundary at the eastern and western ends.

The project site is within the Glenelg Plain and Bridgewater bioregions. The Glenelg Plain bioregion is predominantly flat and low lying with varied flora including coastal communities of beach and dune vegetation, wet heathlands and woodlands. The Bridgewater bioregion is a thin coastal plain characterised by Calcarenite Dune Woodland and Coastal Dune Scrub with intermittent wetlands.

A preliminary flora and fauna assessment has been undertaken by Biosis in relation to the proposed Kentbruck Green Power Hub. To date, detailed surveys for flora species and vegetation communities have not been undertaken. Limited fieldwork has been carried out to broadly characterise the general types of vegetation communities that exist and evaluate methods for further detailed investigations. As field investigations are yet to have commenced, a database review has generated the following information on ecological communities and flora species. The review has identified species with the potential to occur in the study area.

Threatened ecological communities

The following three threatened ecological communities listed under the Flora and Fauna Guarantee Act 1988 (FFG Act) may occur within proximity to the project area, but are not considered likely to occur within the project area itself:

- Coastal Moonah Woodland Community

- Red Gum Swamp Community No. 1

- Victorian Temperate Woodland Bird Community (including Red-tailed Black Cockatoo)

The following five threatened ecological communities listed under the EPBC have the potential to occur within proximity to the project area:

- Assemblages of species associated with open-coast salt-wedge estuaries of western and central Victoria ecological community (endangered)

- Giant Kelp Marine Forests of South East Australia (endangered)

- Grassy Eucalypt Woodland of the Victorian Volcanic Plain (critically endangered)

- Natural Temperate Grassland of the Victorian Volcanic Plain (critically endangered)

- Subtropical and Temperate Coastal Saltmarsh (vulnerable)

None of these ecological communities exist within the proposed site and none of them are known from land immediately adjacent to the site. There are no known effects by which the project might have a significant impact on any of them.

Listed flora species

Initial desktop investigations have identified a total of 21 EPBC Act listed threatened flora species that have the potential to occur within the study area. Of these, 16 are listed as Vulnerable and five are listed as Endangered. Most of these threatened flora species have the potential to occur within the study area along roadsides and other less disturbed portions of the project site such as areas of remnant vegetation. There is potential for impact by ground disturbance or removal of native vegetation if ground disturbance in these areas cannot be avoided.

However, as the project site is primarily occupied by introduced pine plantations, it is no longer considered suitable habitat for these flora species. The project will not affect the existing land use and vegetation will remain largely unchanged. Therefore, the Project is not likely to have any effect on these listed flora species, unless ground disturbance within roadsides and areas of remnant vegetation cannot be avoided. Targeted flora surveys are yet to be undertaken and are planned to be conducted in late 2019 – early 2020.

Listed fauna species

Based on the initial database review, a total of 31 threatened fauna species listed under the EPBC Act have been identified as having the potential to occur within the study are. Nine of these species are considered to have a medium or high potential of occurring within the local and/or study area. To date, field investigations have been completed for the Growling Grass Frog and Australasian Bittern during November/December 2018 and January 2019. Neither species were detected. Field surveys are yet to be undertaken for the Orange-bellied Parrot, Red-tailed Black Cockatoo, Southern Brown Bandicoot, Swamp Antechinus, Long-nosed Potoroo and Heath Mouse.

The Southern Bent-wing Bat is the only EPBC Act listed species identified as having the possibility of being significantly impacted by the Project. Currently, there are ten known roost caves within 30 kilometres of the project boundary. There is a potential risk that the species will collide with turbines, as bats are likely to fly through the site. However, as due to the height of the turbines the likelihood of impact is considered to be low.

As the project will involve minimal reduction in habitat for the species, the potential for the project to lead to a long-term decrease in the size of the population will be a function of density-dependence. As resources for the population are expected to remain stable, mortality of a small number of individuals can be expected to result in improved survivorship of others. It is therefore unlikely that a small number of collisions may lead to a long-term decrease in the population.

To determine the level of activity and utilisation of the wind farm site by this species, a 12-month monitoring program involving acoustic monitoring at a range of heights will be undertaken.

The objective of investigating Southern Bent-wing Bats at the Kentbruck Wind Farm site and environs is to obtain relative measures of the species flight activity to support an informed assessment of the potential risk of collisions for the configuration and specifications of turbines at the site.

Listed migratory species
The preliminary assessment has identified 37 EPBC listed migratory bird species, including shorebirds. Field surveys have been completed in November 2018 and February 2019 for listed shorebirds, with further investigations planned to take place during winter of 2019 and November 2019 for other listed migratory species. The Project is not considered to have any realistic capacity to substantially modify, destroy or isolate an area if important habitat for migratory species.

3.2 Describe the hydrology relevant to the project area (including water flows).

Surface geology of the site is predominantly comprised of Pleistocene aeolian dune deposits, and is host to the water table aquifer (Quaternary aquifer), with the water depth below the ground surface across the site predominantly less than 10 metres.

Based on data obtained from Spatial Datamart, the water table salinity measured (as total dissolve solids) between 500 and 1,000 mg/L. This classifies the water quality as Segment A1-A2 of the SEPP Waters (Groundwater) guidelines suggesting that water quality is good in the area.

The proposed wind farm site and the proposed transmission line routes are located within the Glenelg Basin and Portland Coast Basin catchment regions. The largest watercourse within the catchment is the Glenelg River which is located north of the proposed Project site and is classified as a Heritage River under the Heritage River Act 1992. Johnstone Creek along with some unnamed creeks are located to the east of the proposed site.

The proposed site for the Project is located next to the Glenelg Estuary and Discovery Bay Ramsar Site, which covers approximately 22,289 hectares. The Ramsar site covers the western part of the Lower Glenelg National Park, most of the Discovery Bay Coastal Park and the Nelson Streamside Reserve. Neither the proposed wind farm or transmission line routes are located within the Ramsar site.

Available data suggests there is no indication that the Project site is subject to flooding. Based on regional topography, rainfall on the Glenelg Basin and Portland Coast Basin discharges into both Discovery Bay and Portland Bay.

Local drainage information on the plantation and the proposed wind farm site is also currently not available. The topography of the plantation and the western area of agricultural land within the proposed site generally falls towards to Ramsar site, and ultimately Discovery Bay. This suggests that rainfall on the proposed site may flow either overland or underground towards the Ramsar site eventually reaching Discovery Bay.

3.3 Describe the soil and vegetation characteristics relevant to the project area.

Surface geology in the region consists of a Quaternary deposition associated with coastal dunes, beach sands, swamp deposits and some near shore marine deposits. At the site, the geology comprises predominantly Pleistocene aeolian dune deposits, with some Holocene coastal and inland dunes with minor swamp deposits; and extrusive basalts, scoria and ash to the southeast of the site.

To date, detailed surveys of vegetation communities have not been undertaken. Based on initial desktop studies the following EVCs may be present within the project area (bioregional conservation status is shown in parentheses):

EVC 48 – Heathy Woodland (Least Concern)

EVC 16 – Lowland Forest (Least Concern)

EVC 23 – Herb-rich Foothill Forest (Vulnerable)

EVC 3 – Damp Sands Herb-rich Woodland (Vulnerable)

EVC 8 – Wet Heathland (Least Concern)

EVC 198 – Sedgy Riparian Woodland (Vulnerable)

EVC 681 - Deep Freshwater Marsh (Vulnerable)

EVC 53 - Swamp Scrub (Endangered)

3.4 Describe any outstanding natural features and/or any other important or unique values relevant to the project area.

There are no outstanding natural features or important or unique values relevant to the project area

3.5 Describe the status of native vegetation relevant to the project area.

As outlined in Section 3.1, the proposed site has been subject to previous disturbance. Therefore, the presence of native vegetation is largely restricted to roadside reserves and small tracts of either regrowth or remnant native vegetation.

3.6 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

The topography of the plantation and agricultural land within the proposed site, generally falls

south towards the Glenelg Estuary and Discovery Bay Ramsar site.

The northern border of the proposed wind farm, which cuts through the Kentbruck Plantation site, generally follows a local ridgeline that connects a local highpoint near Wade Junction to the mountain range that runs north-south, beginning at Mount Richmond, through the Lower Glenelg and Cobboboonee National Parks.

On the western end of the proposed site an area of agricultural land exists to the south of Portland-Nelson Road. This agricultural area is split by a section of and is ultimately bordered by the Ramsar site to the south. The topography of this area also grades down towards the Ramsar site, and ultimately to Discovery Bay. On the eastern end of the proposed site, an area of agricultural land that exists between Portland-Nelson Road and Lower Glenelg National Park is designated as land subject to inundation.

There is also an area of the site that sits on a plateau of Mount Richmond, where parts of the area drain to the north, south, east and west depending on the location within the proposed site.

3.7 Describe the current condition of the environment relevant to the project area.

The proposed project area is a highly modified site that has been subject to large amounts of disturbance. The wind farm site consists primarily of commercially managed and harvested timber plantation (radiata pine) and small areas of land used for agricultural purposes (primarily grazing) at the western and eastern extents. The use of the wind farm site for forestry and grazing purposes means that the land has been subject to previous disturbance. Therefore, presence of native vegetation is largely restricted to roadside reserves and small areas of regrowth, and the site is no longer considered suitable habitat for supporting many flora and fauna species.

3.8 Describe any Commonwealth Heritage Places or other places recognised as having heritage values relevant to the project area.

No Commonwealth Heritage Places have been identified relevant to the project area. However, there are three items of local natural heritage value that are listed on the Glenelg Planning Scheme:

- Johnstone River (HO139)

- Johnstone Creek (HO146)

- Swan Lake (HO156)

3.9 Describe any Indigenous heritage values relevant to the project area.

No Aboriginal heritage sites are recorded within the Project site, however there are six Aboriginal heritage places recorded adjacent to the Project area:

- Site 2 Sutton Rocks Survey Area, VAHR 7121-0022

- Site 1 Sutton Rocks Survey Area, VAHR 7121-0060

- Site 3 Sutton Rocks Survey Area, VAHR 7121-0061

- Macfarlane’s Swamp 1, VAHR 7121-0295

- Macfarlane’s Swamp 2, VAHR 7121-0296

- Macfarlane’s Swamp 3, VAHR 7121-0297

3.10 Describe the tenure of the action area (e.g. freehold, leasehold) relevant to the project area.

The wind farm site and battery storage facility is on freehold land including freehold land being used for commercial forestry purposes.

The land which falls within the development envelopes for the transmission line route options is also predominantly freehold land. Some parts of the transmission line development envelopes will be located on, over or under Crown land (including National Park, open / public road reserves and unused Government (paper) roads).

3.11 Describe any existing or any proposed uses relevant to the project area.

The current land use and development of the three project elements are as follows:

The wind farm is located primarily within an area that has been substantially modified for commercial forestry use (radiata pine). Small sections of grazing also exist within the wind farm site boundary at the eastern and western extents. The transmission line options are located primarily within freehold land used for grazing (option one and two) and beneath existing roads that bisect National Park/Forest Park land (option one).

The battery storage facility options are located within an area for commercial forestry purposes or grazing (option one), and adjacent to either the Heywood Terminal Station (in Heywood) or where the project would connect to the existing 500kV line between Portland and Heywood.

Section 4 - Measures to avoid or reduce impacts

Provide a description of measures that will be implemented to avoid, reduce, manage or offset any relevant impacts of the action. Include, if appropriate, any relevant reports or technical advice relating to the feasibility and effectiveness of the proposed measures.

Examples of relevant measures to avoid or reduce impacts may include the timing of works, avoidance of important habitat, specific design measures, or adoption of specific work practices.

4.1 Describe the measures you will undertake to avoid or reduce impact from your proposed action.

The Project itself will provide a supply of renewable electricity to the National Electricity Market (NEM). The Project will play a key role in supporting Victoria's transition to increased penetration of renewable energy in the electricity generation sector. The design and development of the Project will continue to occur as further site assessments are undertaken. This will be an iterative process that will respond to ongoing environmental and technical studies and will allow Neoen to consider several potential mitigations early in the design development process.

As detailed flora and fauna assessments are either underway or yet to commence, mitigation measures have not yet been determined. Resultant from these studies will be the identification of specific measures to manage potential effects on indigenous flora and fauna. These may include the siting of infrastructure away from areas of known or potential habitat or dispersal areas for threatened or listed species and communities.

Mitigation measures for Aboriginal Cultural Heritage are not yet proposed. However, a mandatory CHMP will be required under the Aboriginal Heritage Act 2006 if any components of the proposed Project cannot avoid areas of cultural heritage sensitivity that have not been subject to significant ground disturbance, and the activity is listed as high impact pursuant to the Regulations. The CHMP will include measures to manage and mitigate potential impacts to both known and unknown sites of Aboriginal cultural heritage.

4.2 For matters protected by the EPBC Act that may be affected by the proposed action, describe the proposed environmental outcomes to be achieved.

To determine the level of activity and utilisation of the wind farm site by the Southern Bent-wing Bat, a 12-month monitoring program involving acoustic monitoring at a range of heights will be undertaken. The objective of investigating Southern Bent-wing Bats at the Kentbruck Wind Farm site and environs is to obtain relative measures of the species flight activity to support an informed assessment of the potential risk of collisions for the configuration and specifications of turbines at the site.

The Project is not anticipated to have major effects on the health or biodiversity of aquatic,

estuarine or marine ecosystems over the long term. The risk of affecting marine or water environments is significantly reduced after the construction phase of the Project once the site has been re-established. Mitigation measures will be implemented to manage short term risks during construction that are typical of Projects of this type and scale and that will ensure there are no long-term major effects on the health of these ecosystems. Measures will be taken to ensure the adjacent Ramsar site (Glenelg Estuary and Discovery Bay Ramsar Site) is not impacted by the Project during construction and operation.

Section 5 – Conclusion on the likelihood of significant impacts

A checkbox tick identifies each of the matters of National Environmental Significance you identified in section 2 of this application as likely to be a significant impact.

Review the matters you have identified below. If a matter ticked below has been incorrectly identified you will need to return to Section 2 to edit.

5.1.1 World Heritage Properties

No

5.1.2 National Heritage Places

No

5.1.3 Wetlands of International Importance (declared Ramsar Wetlands)

No

5.1.4 Listed threatened species or any threatened ecological community

No

5.1.5 Listed migratory species

No

5.1.6 Commonwealth marine environment

No

5.1.7 Protection of the environment from actions involving Commonwealth land

No

5.1.8 Great Barrier Reef Marine Park

No

5.1.9 A water resource, in relation to coal/gas/mining

No

5.1.10 Protection of the environment from nuclear actions

No

5.1.11 Protection of the environment from Commonwealth actions

No

5.1.12 Commonwealth Heritage places overseas

No

5.2 If no significant matters are identified, provide the key reasons why you think the proposed action is not likely to have a significant impact on a matter protected under the EPBC Act and therefore not a controlled action.

The proposed project area is a highly modified site that has been subject to large amounts of disturbance. The wind farm site consists primarily of commercially managed and harvested timber plantation (radiata pine) and small areas of land used for agricultural purposes (primarily grazing) at the western and eastern extents. The use of the wind farm site for forestry and grazing purposes means that the land has been subject to previous disturbance.

The Southern Bent-wing Bat is the only EPBC Act listed species identified as having the possibility of being significantly impacted by the Project. Currently, there are ten known roost caves within 30 kilometres of the project boundary. There is a potential risk that the species will collide with turbines, as bats are likely to fly through the site. However, as due to the height of the turbines the likelihood of impact is considered to be low.

As the project will involve minimal reduction in habitat for the species, the potential for the project to lead to a long-term decrease in the size of the population will be a function of density-dependence. As resources for the population are expected to remain stable, mortality of a small number of individuals can be expected to result in improved survivorship of others. It is therefore unlikely that a small number of collisions may lead to a long-term decrease in the population.

Section 6 – Environmental record of the person proposing to take the action

Provide details of any proceedings under Commonwealth, State or Territory law against the person proposing to take the action that pertain to the protection of the environment or the conservation and sustainable use of natural resources.

6.1 Does the person taking the action have a satisfactory record of responsible environmental management? Please explain in further detail.

Neoen is a long-term owner and operator of renewable energy facilities and owns 11 projects either operating or under-construction in Australia with a cumulative capacity of more than 1000MW. Neoen's aim is to develop environmentally and economically sound projects and adopts a whole-of-life cycle approach to managing environment impacts on projects. Neoen's Project Management Plan (PMP) summarizes the main tasks and deliverables that are expected from Project Managers for the successful achievement of projects across the development, construction and operations phases. This includes the framework for ensuring that all permits and approvals are complied with at all times.

We recognise that a crucial part of reducing greenhouse gas emissions is to replace fossil fuels with natural, renewable sources of energy such as wind and solar. The addition of batteries to renewable projects helps to mitigate the intermittent nature of renewable sources by allowing excess power generated to be stored and dispatched into the grid during times of peak demand.

Managing environmental impacts starts during the design phase of a project. Neoen's primary aim is to avoid adverse environmental impacts. Where impacts cannot be avoided, mitigation measures are developed to minimise the impact on relevant species. These can include micro-siting infrastructure away from areas of high conservation significance, creating "no-go zones" or implementing monitoring programs for particular species.

The recommendations and requirements in the environmental studies are integrated into the Development Permit for a project. Neoen takes our environmental responsibilities extremely seriously and works with construction and operation contractors to ensure that the roles and responsibilities for fulfilling the conditions of approval are clearly defined.

6.2 Provide details of any past or present proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against either (a) the person proposing to take the action or, (b) if a permit has been applied for in relation to the action – the person making the application.

Neoen is the owner of 11 wind and solar farm projects in Australia that are either under construction or under operation. There are no past or present proceedings against Neoen relating to either (a) or (b) above.

6.3 If it is a corporation undertaking the action will the action be taken in accordance with the corporation's environmental policy and framework?

Yes

6.3.1 If the person taking the action is a corporation, please provide details of the corporation's environmental policy and planning framework.

Neoen is committed to provide a healthy and safe working environment for its employees, guarantee the integrity of the company's assets and protect the environment.

At Neoen, we believe:

- All accidents and damages to the employees, contractors, customers, off-takers, visitors, property, the environment and surrounding communities can be avoided and we will undertake all appropriate measures with the goal of eliminating all of them.

- Health, Safety and Environmental management is a daily individual and team responsibility.

- Each company member must be dedicated to conduct all required activities in order to develop the proper attitudes and practices, with the greatest concern for employees' health & safety , the environment and local communities.

- All of us should actively contribute to HS&E programs during the development, construction and operation of Neoen's assets, and seek to achieve an accident free work environment for Neoen employees, its customers and its contractors.

Accordingly, Neoen is committed to:

- Meeting or exceeding all applicable Health, Safety & Environmental laws or regulations.

- Pursue the objective of no harm to people, the company's assets and no damage to the environment or the local communities.

- Minimize adverse impacts of our activities to the environment and the ecosystem , optimize the social impact to the communities in the surrounding of Neoen's facilities, and preserve the local cultural heritage.

- Taking actions to prevent pollution and promoting the sustainability of the natural resources that we use.

- Manage the HS&E matters as any other critical business activity in the company, with a continuous performance improvement mindset.

- Provide guidance, support and training to our personnel and contractors in order to create and maintain a best in class HS&E culture.

6.4 Has the person taking the action previously referred an action under the EPBC Act, or

been responsible for undertaking an action referred under the EPBC Act?

Yes

6.4.1 EPBC Act No and/or Name of Proposal.

Hornsdale Wind Farm, South Australia (EPBC referral 2012/6573)

Bulgana Green Power Hub, Victoria (EPBC referral 2015/7460)

Western Downs Green Power Hub (EPBC referral 2018/8301)

Kaban Green Power Hub, Queensland (EPBC referral 2018/8289)

Section 7 – Information sources

You are required to provide the references used in preparing the referral including the reliability of the source.

7.1 List references used in preparing the referral (please provide the reference source reliability and any uncertainties of source).

Reference Source	Reliability	Uncertainties
References are provided within the accompanying ecology technical report which support this referral documentation.	n/a	n/a

Section 8 – Proposed alternatives

You are required to complete this section if you have any feasible alternatives to taking the proposed action (including not taking the action) that were considered but not proposed.

8.0 Provide a description of the feasible alternative?

Neoen is committed to progressing the development of the Kentbruck Green Power Hub subject to ongoing investigations and relevant regulatory requirements.

No alternatives are being considered for this Project. Neoen is currently focused on developing the Kentbruck Green Power Hub.

Neoen’s selection of the Kentbruck Green Power Hub Project for further feasibility assessment was informed by an understanding of the available wind resource, the proximity of a possible electricity transmission network connection point, site access and environmental and planning constraints including:

- land use and tenure

- locations of dwellings and other sensitive receptors

- the boundaries of National Parks and Ramsar wetland sites

- areas of ecological sensitivity

- areas of cultural heritage sensitivity.

8.1 Select the relevant alternatives related to your proposed action.

8.27 Do you have another alternative?

No

Section 9 – Contacts, signatures and declarations

Where applicable, you must provide the contact details of each of the following entities: Person Proposing the Action; Proposed Designated Proponent and; Person Preparing the Referral. You will also be required to provide signed declarations from each of the identified entities.

9.0 Is the person proposing to take the action an Organisation or an Individual?

Organisation

9.2 Organisation

9.2.1 Job Title

State Leader Victoria

9.2.2 First Name

Matthew

9.2.3 Last Name

Parton

9.2.4 E-mail

Matthew.parton@neoen.com

9.2.5 Postal Address

Level 6, 16 Marcus Clarke Street
Canberra ACT 2601
Australia

9.2.6 ABN/ACN

ABN

57160905706 - NEOEN AUSTRALIA PTY. LTD.

9.2.7 Organisation Telephone

02 9269 0170

9.2.8 Organisation E-mail

Matthew.parton@neoen.com

9.2.9 I qualify for exemption from fees under section 520(4C)(e)(v) of the EPBC Act because I am:

Not applicable

Small Business Declaration

I have read the Department of the Environment and Energy's guidance in the online form concerning the definition of a small a business entity and confirm that I qualify for a small business exemption.

Signature:..... Date: .....

9.2.9.2 I would like to apply for a waiver of full or partial fees under Schedule 1, 5.21A of the EPBC Regulations

No

9.2.9.3 Under sub regulation 5.21A(5), you must include information about the applicant (if not you) the grounds on which the waiver is sought and the reasons why it should be made

Person proposing the action - Declaration

I, MATTHEW PARTON, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf of or for the benefit of any other person or entity.

Signature:..... Date: 26/08/2019

I, _____, the person proposing the action, consent to the designation of _____ as the proponent of the purposes of the action describe in this EPBC Act Referral.

Signature:..... Date: .....

9.3 Is the Proposed Designated Proponent an Organisation or Individual?

Organisation

9.5 Organisation

9.5.1 Job Title

State Leader Victoria

9.5.2 First Name

Matthew

9.5.3 Last Name

Parton

9.5.4 E-mail

Matthew.parton@neoen.com

9.5.5 Postal Address

Level 6, 16 Marcus Clarke Street
Canberra ACT 2601
Australia

9.5.6 ABN/ACN

ABN

57160905706 - NEOEN AUSTRALIA PTY. LTD.

9.5.7 Organisation Telephone

02 9269 0170

9.5.8 Organisation E-mail

Matthew.parton@neoen.com

Proposed designated proponent - Declaration

I, MATTHEW PARTON, the proposed designated proponent, consent to the designation of myself as the proponent for the purposes of the action described in this EPBC Act Referral.

Signature:..... Date: 26/08/2019

9.6 Is the Referring Party an Organisation or Individual?

Organisation

9.8 Organisation

9.8.1 Job Title

State Leader Victoria

9.8.2 First Name

Matthew

9.8.3 Last Name

Parton

9.8.4 E-mail

Matthew.parton@neoen.com

9.8.5 Postal Address

Level 6, 16 Marcus Clarke Street
Canberra ACT 2601
Australia

9.8.6 ABN/ACN

ABN

57160905706 - NEOEN AUSTRALIA PTY. LTD.

9.8.7 Organisation Telephone

02 9269 0170

9.8.8 Organisation E-mail.

Matthew.parton@neoen.com

Referring Party - Declaration

I, MATTHEW PARTON, I declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence.

Signature:..... Date: 26/08/2019

Appendix A - Attachments

The following attachments have been supplied with this EPBC Act Referral:

1. 29806.KGPH_.EPBC_.referral.RPT_.20190808_Optimized.pdf
2. EPBC referral GIS shapefiles.zip
3. F2_Project_Overview.pdf