



Waubra Wind Farm

Complaint and Evaluation
Procedure



October 2018



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ACCIONA Energy Australia Global Pty Ltd
ABN 98 102 345 719
Melbourne Central Tower,
Level 38, 360 Elizabeth Street
Melbourne VIC 3000 Australia
Tel: +61 3 9027 1000
Fax: +61 3 9027 1001
Web: www.accionacom

Author: Kirsten Lee
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1 Introduction

This document outlines the complaints and evaluation process for complaints regarding the operation of the Waubra Wind Farm, including noise, shadow flicker, telecommunications interference or other issues that may be raised by the community.

This procedure also outlines how ACCIONA Energy will comply with Planning Permit conditions relating to noise, shadow flicker and telecommunications reception and interference.

All complaints and enquiries received from the community and project neighbours, regarding the construction and operation of the Waubra Wind Farm, will be taken seriously by ACCIONA Energy. ACCIONA Energy are committed to:

- Acknowledging the importance and value of feedback (including enquiries and complaints);
- Providing an accessible avenue for people to provide feedback or raise concerns; and
- Ensuring all feedback is managed fairly, promptly, sensitively and efficiently.

2 Process

The complaints process has four key steps:

1. Receive
2. Record and Register
3. Investigate and Respond
4. Close and Review

The Community Relations Co-ordinator in conjunction with the Site Manager of the Waubra Wind Farm, is responsible for ensuring all complaints are processed in accordance with this procedure.

3 Receive

3.1 Complaints received by ACCIONA Energy

Any complaint regarding the Waubra Wind Farm operations can be directed to ACCIONA Energy through:

- The community hotline 1800 283 550
- Email waubra@acciona.com
- Mail ACCIONA Energy
PO Box 24110
Melbourne VIC 3000

The community hotline number is a free-call number which operates 24 hours per day and is serviced by both staff and a message service. This free call number is also displayed on signage on road access tracks, at the Waubra Wind Farm.

ACCIONA Energy promotes these contact methods through its newsletters, websites and other communication methods associated with the Waubra Wind Farm.

Feedback can be about:

- Upcoming project works;
- Any perceived impact from our operations; and
- Our practices and processes.

ACCIONA Energy will not acknowledge or respond to:

- Feedback sent for the sole purpose of harassment.
- Anonymous feedback will be considered and recorded in our system. However, with no means of contacting the sender, an acknowledgment or response will not be provided.

3.2 Complaints received by third parties

If a complaint is received by Council, Department of Environment, Land, Water and Planning (DELWP) or the Environment Protection Authority (EPA), details of that complaint may be forwarded to ACCIONA Energy.

ACCIONA Energy will consult with the third party – and with the complainant – in order to determine if that complaint will be assessed in accordance with this Complaints Procedure.

If it is agreed that the complaint received by a third party is related to the operation of the Waubra Wind Farm – and the complainant consents for ACCIONA Energy to investigate - then the complaint will be assessed in accordance with this Complaints Procedure.

If a complaint received by a third party is not deemed to be related to the operation of the Waubra Wind Farm – and/or the complainant does not consent to ACCIONA Energy investigating their complaint – then the third party will retain responsibility for investigating that complaint.

4 Record and Register

ACCIONA Energy will record and register all enquiries and complaints, as well as determine an appropriate response, within five working days of receiving it.

All details received from the stakeholder will be recorded to capture detailed information, including:

- the name, address and contact details;
- the date and time of the contact;
- the nature of the enquiry or complaint;
- the outcome sought;
- any other information relating to the matter; and
- the person/team member who received the complaint.

Sufficient details will be sought regarding the specific nature of the complaint to enable it to be clearly recorded, and to enable subsequent assessment.

For noise complaints, where relevant and provided, the weather conditions, the time and a description of the noise will also be captured.

The Community Relations Co-ordinator in conjunction with the Site Manager, is responsible for ensuring all complaints are processed in a timely manner.

Records will be maintained of all communications in regard to the complaint. ACCIONA Energy currently uses a program called Consultation Manager to record all information regarding noise complaints and responses. Previously an Environmental Complaint Form was completed, this information is now captured in the stakeholder data base of Consultation Manager. Reports can be generated as required.

In addition, all noise complaints will be recorded by ACCIONA Energy in the Complaints register. Each noise complaint will be allocated an incident number, with these numbers also recorded in the Complaints register. The Complaints register may be inspected by the Minister for Planning at any time.

5 Investigate and Respond

The process to investigate and respond to noise, shadow flicker or telecommunications Reception and interference complaints is outlined in the following sections.

5.1 Noise Complaints

5.1.1 Within 2 kilometres of a turbine (new noise complaints)

When a noise complainant's house is within two kilometres of a turbine, ACCIONA Energy will refer to the modelled pre-construction noise level data at the noise complainant's house – or at a nearby location. ACCIONA Energy will also refer to the results of the post-construction noise monitoring program where such monitoring has been completed in accordance with Condition 17 of the planning permit.

The noise complainant will be advised if the outcome of the post-construction noise monitoring program demonstrates that noise levels at the noise complainant's house – or at a nearby location - complies with the noise limits set out in Condition 14 of the planning permit.

Where these results related to a nearby location rather than the complainants house, the complainant will be advised of the uncertainty associated with reliance on that nearby location.

If the noise complainant is satisfied with that advice, ACCIONA Energy will provide a written response to the noise complainant to resolve the complaint.

If the noise complainant is not satisfied with that advice, ACCIONA Energy will discuss options for further investigation with the noise complainant. These options may include:

- Providing information about the noise monitoring and post-construction noise monitoring program.
- Discussing options to mitigate the noise complainants concerns.
- Undertaking a noise monitoring survey, for first time complainants

5.1.2 Noise monitoring within 2 kilometres of a turbine

If the post-construction noise monitoring program results – undertaken in accordance with Condition 17 - do not provide an adequate indication of noise compliance being achieved at the complainants' house, an acoustic expert may be engaged to evaluate this, then noise monitoring may be undertaken.

If ACCIONA Energy and the noise complainant agree to undertake noise monitoring, that noise monitoring will be undertaken generally in accordance with NZS 6808:1998 and Condition 14 of the planning permit.

If ACCIONA Energy and the noise complainant agree to undertake noise monitoring, that noise monitoring will be undertaken at the same location (where possible) as the pre-construction monitoring (if this was undertaken). If preconstruction monitoring data was collected, noise monitoring will be undertaken considerate of the following rules:

- At least 5m away from any reflective surface (e.g. building, solid fence);
- Within 20m of the dwelling;
- Within property boundaries;
- Between the dwelling and the nearest turbines; and
- Avoid close proximity to “noisy” vegetation.

If available, baseline or pre-construction noise data for the complainant’s house will be used to compare the monitoring data against, with reference to the limits set out in the planning permit Condition 14 of the planning permit.

If there is no baseline or pre-construction data for that property to compare the monitoring data against, baseline data from the nearest available location with the most similarity of noise conditions (an acoustic expert may be engaged to evaluate this) will be used. The complainant will be advised of the uncertainty associated with reliance on that nearby location’s data as pre-construction comparison.

Information will be provided to the noise complainant about the noise monitoring program and ACCIONA Energy will provide and discuss the results with the noise complainant.

If the noise complainant is satisfied with the noise monitoring results, ACCIONA Energy will provide a written response to the noise complainant to resolve the complaint.

If the noise complainant is not satisfied with the response, ACCIONA Energy will discuss options for further investigation with the noise complainant. These options may include:

- Requesting a review of their noise complaint
- Discussing options to mitigate the noise complainants concerns

If noise monitoring indicates that the Waubra Wind Farm may not demonstrate compliance with the conditions of the planning permit at the noise complainant’s property, relevant results and circumstances will be further investigated. If required, ACCIONA Energy will prepare a noise management plan within thirty (30) days outlining how it will rectify a demonstrated non-compliance.

5.1.3 Beyond 2 kilometres from a turbine

When a noise complainant’s house is beyond two kilometres of a turbine, ACCIONA Energy will refer to the modelled pre-construction noise levels at the noise complainants’ house – or at a nearby location.

ACCIONA Energy will also refer to the results of post-construction noise monitoring program (where such monitoring has been undertaken in accordance with Condition 17) to establish whether noise compliance is likely to be achieved at the complainants house.

The noise complainant will be advised if the outcome of the post-construction noise monitoring program demonstrates that noise levels at the wind farm comply with the noise limits set out in Condition 14 of the planning permit, and therefore that compliance is assumed at their property, noting that it is located at a distance beyond houses which form part of the noise compliance testing process.

Where these results related to a nearby location rather than the complainants house, the complainant will be advised of the uncertainty associated with reliance on that nearby location.

If the noise complainant is satisfied with that advice, ACCIONA Energy will provide a written response to the noise complainant to resolve the complaint.

If the noise complainant is not satisfied with that advice, ACCIONA Energy will discuss options for further investigation with the noise complainant. These options may include:

- Providing information about the noise monitoring and post-construction noise monitoring program.
- Requesting a review of their noise complaint.
- Discussing options to mitigate the noise complainants concerns.

5.1.4 Noise Complaints relating to maintenance issues

Noise complaints received from complainants that relate to unspecific turbine issues, such as unusual noises, will be recorded and investigated as mentioned in 5.1.1.

After investigation, the maintenance issues will be rectified and the outcome will be communicated to the complainant

5.1.5 Noise Monitoring outside 2 kilometres of a turbine

Noise monitoring will generally not be undertaken at properties beyond two kilometres of a wind turbine.

Should the results of the post-construction noise monitoring program indicate that noise monitoring may be required at properties beyond two kilometres of a wind turbine, ACCIONA Energy will discuss these results with relevant authorities – and the noise complainant – in order to determine if such monitoring will be undertaken.

If the noise complainant is satisfied with that advice, ACCIONA Energy will provide a written response to the noise complainant to resolve the complaint.

If the noise complainant is not satisfied with that advice, ACCIONA Energy will discuss options for further investigation with the noise complainant. These options may include:

- Providing information about the noise monitoring and post-construction noise monitoring program.
- Requesting a review of their noise complaint.
- Discussing options to mitigate the noise complainants concerns.

5.1.6 Unresolved Complaints

Serial complainants will be 'case managed' by the allocated ACCIONA Energy staff member.

ACCIONA Energy has historically received noise complaints regarding the operations of the Waubra Wind Farm from a number of complainants. These complaints initially have all been processed in accordance with this procedure.

A small number of noise complaints are considered by the complainant to be unresolved. An unresolved complaint is one where the complainant continues to make noise complaints after ACCIONA Energy has followed the process outlined in section 5.1.1 to investigate and resolve the noise complaint.

Where a noise complaint is made by an existing complainant, the complaint will be referred to the appropriate case manager in order to oversee the response process. The complaint is to be recorded in both the Complaints Register and in Consultation Manager. The complaint will be recorded and noted and the complainant will be issued an incident number.

5.2 Shadow Flicker Complaints

ACCIONA Energy will investigate complaints of shadow flicker on an individual property. When the complainant's property is within one and a half kilometres of a turbine, a shadow flicker assessment may be undertaken.

Complainants will be asked for details of the timing and duration of the shadow flicker, and weather conditions at the time and date of observation.

Complaints will be assessed considering the proximity of the residence to the wind farm and correlation between the timing and duration of reported flicker effects and computer generated shadow flicker models.

If the assessment indicates that the Waubra Wind Farm may not demonstrate compliance with the conditions of the planning permit, relevant results and circumstances will be investigated. If required, ACCIONA Energy will prepare a shadow flicker management plan outlining how it will rectify that non-compliance.

5.3 Telecommunications Reception and Interference Complaints

ACCIONA Energy will investigate complaints regarding telecommunications reception and interference on an individual house that are wind farm related. When available, information involving TV reception complaints will be captured in Consultation Manager.

During the first 5 years of operations of the Waubra Wind Farm, ACCIONA was committed to undertake a television and radio reception quality assessment where complainants' properties located within three kilometres of a turbine.

Several TV reception complaints were received post-commissioning of the wind farm.

ACCIONA Energy arranged for an experienced telecommunications technician to undertake a qualitative survey at those houses to establish if there has been any detrimental increase in interference with reception caused by the wind farm, as compared with the pre-construction quality survey.

The complaints and the telecommunications survey resulted in ACCIONA installing two digital retransmission facilities in the area which will continue to operate for the life of the

wind farm. All complainants also had their TV reception assessed by an independent TV technician who restored TV reception back to pre-construction quality reception, or better.

Going forward, ACCIONA Energy will investigate TV reception and interference complaints that:

- Do not relate to pre-existing TV reception issues
- Do not relate to regular TV tuning, TV aerial issues and weather conditions that are not attributed to the operations of the Waubra wind farm
- Do not relate to accommodating reception for multiple TV's at a residence

The TV reception complainant should contact the Waubra Wind Farm Site Manager (03 5343 1313) to lodge a complaint. This complaint will be investigated and may or may not require further follow up with TV Technician.

6 Close and Review

All enquiries and complaints will be brought to closure, summarising all of the steps taken to investigate and resolve any concerns and the outcomes.

ACCIONA Energy will communicate the outcome of the enquiry or complaint using the most appropriate method. ACCIONA Energy will advise:

- What actions were undertaken in response;
- The outcome;
- The reasons decisions have been made;
- Any remedy or resolutions that have been offered; and
- Information about other remedies that may be available to the stakeholder.

ACCIONA Energy will maintain communication with the complainant during the review process.

7 Procedure Review

ACCIONA Energy will review this Complaints and Evaluation Procedure at least every five years.

This review will evaluate the performance of the complaint management system, as well as continually improve the effectiveness and efficiency of the system.

The review should also provide information on:

- Conformity to complaint management procedures
- Suitability to achieve complaint management objectives