

 9 Brooking St
PO Box 96
WILLIAMS WA 6391

 (08) 9885 1005

 www.williams.wa.gov.au
shire@williams.wa.gov.au

CASHIER HOURS
8:00am - 5:00pm
MONDAY - FRIDAY

16 May 2025

Katina Marchbank

Principal Planner | Land Use Planning
Department of Planning, Lands and Heritage
140 William Street, Perth WA 6000

sdaureferrals@dplh.wa.gov.au
Rachel.Bridges@dplh.wa.gov.au


**RE: Proposed Neoen Wind Farm (Shires of
Narrogin & Williams)**


Draft

Thank you for the opportunity to comment on the proposed Neoen Wind Farm. The Shire of Williams comments are provided below,

Ref	Statement in the Neoen Development Application	Shire of Williams Comment
P6	hold public briefings which will provide timely information to regional business and industry on the jobs, services, supplies, and support requirements of the Project	<p>The Shire of Williams recommends that public briefings be held Quarterly by Neoen through the construction period.</p> <p>The appointed EPC contractor should also participate and present at each of these briefings because they will be the main interface with local businesses and the community.</p>
P8	A Community Benefit Fund will be established for the Project and will provide an annual contribution of \$225,000 to community grants, which will commence at the start of the Project's operations and will run annually for the Project's lifetime	<p>The Community Benefit Fund should be indexed to CPI. If that is not done, then the true value of the community benefits is diminished over time.</p> <p>The start of project operations is not defined but is assumed to be from commissioning.</p> <p>The Community Benefit Fund should be administered via Local Governments, which have the legislative & audit framework, public meetings monthly with public disclosures of financial records, and elected members elected by the public to govern in the community interest.</p>
P8	The fund will be administered as a non-profit foundation and the	<p>The Shire of Williams <u>does not agree</u> with the proposed not for profit foundation approach to the management of the community benefits funds.</p>



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decision-making will be undertaken by an Advisory Committee consisting of representatives from the local Shires, the local community and Neoen. Local community organisations will be able to apply for this fund for local community-building, environmental, and education projects

The Shire's view is that the preferred model is for the community benefit to be administered by the Shires -Narrogin & Williams.

Neoen to make annual payments to the Shires, to be held in a dedicated restricted cash reserve account established for the Neoen Community Benefit Fund. The Shires will manage and disburse the funds in accordance with the Local Government Act 1995 and relevant financial management regulations and audit requirements. By having the local governments manage the fund, the Shires leverage existing governance systems, transparency mechanisms, and community accountability measures. Local governments are best positioned to understand local needs, coordinate projects, exercise sound governance, and maximise returns on investment for community betterment. All Community Benefit monies received will be accounted for in the Shire's annual budget (as restricted funds), and unspent funds will be carried forward in the reserve. Recognition protocols will be established so that Neoen's contribution is acknowledged in Shire publications and at project openings, ensuring the Neoen is credited for their community investment (thus supporting their Environmental Social & Governance (ESG) and social license objectives.


Local Government Councils are elected by their communities, have Long Term Financial Plans, significant community asset management, external and independent auditing, and public meeting monthly.


The proposed \$25,000 per annum Indigenous Benefit component can be managed by the Indigenous Traditional Owner group.


Suggested thematic approach areas of investment include:

- Sport & Recreation: Enhancing sport & recreation facilities, the lifeblood of rural towns;




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		<ul style="list-style-type: none"> • Health and Wellbeing: Enhancing health and wellbeing generally; • Education and Training: Scholarships and workforce development programs; • Environmental Initiatives: Promoting renewable adoption and conservation; • Arts, Culture & Events: Fostering vibrant regional communities; • Disaster Resilience and Emergency Services: Strengthening emergency services; and • Tourism Development: Investing in attractions to drive economic growth.
P8	Neoen has already started engaging with the community to understand the priorities of local residents with regards to a Community Benefit Fund.	Engagement done to date has been targeted to landholders involved more than the general public. Past consultation should not be reflective of the consultation required if and when the project moves past the financial investment decision to proceed. There should be project launch for the public should that happen.
P8	Furthermore, the Project will deliver a Neighbour Benefit Scheme (NBS), going 'above and beyond' the state government's planning requirements for large-scale renewable energy projects in WA. The NBS will ensure near neighbours can directly benefit from the region's energy transition.	<p>A neighbourhood benefit is not part of a community benefit fund.</p> <p>Benefits to individual landholders are often confidential and may come with Non-Disclosure Agreements.</p>
P8	Once operational, the plant will produce enough energy to power over 100,000 households displacing 346,000 tonnes of CO ₂ annually	These sorts of numbers are used by most renewable energy proponents but rarely does the community see a true energy balance model of what energy it takes to build a project and where & when the energy breakeven point is.
P17	Firewater tanks.	It is not clear if these tanks can be used by volunteer fire fighters.
P17	The Project construction period is estimated at approximately 33 months. The workforce is expected to fluctuate in size throughout this period, with an estimated peak construction workforce of 250 personnel.	<p>Neoen and the SDUA are encouraged to consider the placement of workers in the town of Narrogin and Williams to;</p> <ul style="list-style-type: none"> • Leverage power, water, and sewer infrastructure that will have to be created for a



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	The workforce will likely stay in nearby townships, with a temporary accommodation camp on-site also being considered as a contingency	<p>greenfield temporary camp. This can save complexity and money for Neoen.</p> <ul style="list-style-type: none"> • Enable construction workers to make use of community recreation and commercial facilities. • Save Neoen building things like gymnasiums- recreation rooms etc. • Leverage a legacy benefit for communities • Save on demobilisation costs
P19	Relocation of turbines to provide a minimum conservative setback of 325 m from adjoining property boundaries	<p>This setback does not align with the Shire of Williams Local Planning Policy which includes a setback of 800m unless the neighbour agrees to a lesser distance.</p> <p>It is noted that 24 of the 25 towers are proposed to be in the Shire of Narrogin.</p>
P29 & P47	The workforce will likely stay in nearby townships, with a temporary accommodation camp on-site also being considered as a contingency.	<p>There is insufficient existing accommodation in the towns of Narrogin and Williams to accommodate the sort of construction workforce the project will need.</p> <p>Neoen intent to secure accommodation in towns is not transparent and has not been well communicated.</p> <p>This raises the prospect that Neoen is making a cursory comment about town accommodation and is in reality proposing a temporary camp.</p> <p>Temporary accommodation can be installed in the towns on existing services saving costs Neoen, which have to power, reticulate potable water, and manage wastewater on greenfield temporary site.</p> <p>Recreation rooms, gym, dining rooms, catering facilities can also be saved by located workers in the towns (p41).</p> <p>The proposed temporary camp site is approx. 13km from the town of Williams. Town based accommodation allows construction staff to benefit from and better use community services and facilities.</p>



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P29	The Project may seek to develop onsite borrow pits and quarries to support construction.	Neoen has advised it will need substantial gravel. Neoen and other wind farm proposals will cause an escalation of gravel costs locally, increase completion of the limited supplies, which are also needed by Main Roads and Local Government to maintain public road networks for other industries and the community.
P97-99	<p>Neoen considers that it is unreasonable and the commercial risk too great, to expect a wind farm operator to modify the operating parameters of an approved or constructed asset to meet the noise regulations at a future and unanticipated land use. Neoen was made aware in September 2024 that two development applications (the DAs) had been approved for the construction of two dwellings on a lot to the west of the Project Site. These were submitted and approved after the Project was announced and early details of turbine locations made available to key stakeholders. The predicted noise levels at these proposed dwellings would be between 40 and 45 db(A), requiring curtailment of the wind farm outside the day period as defined in the Noise Regulations at high wind speeds.</p> <p>It is considered that the DAs are an attempt to impede the approval of the Project rather than a legitimate desire to construct a new dwelling in this area based on the interactions between the landowner and Neoen to date. The appropriateness of the location of these dwellings is questioned, given both dwellings have been sited as close as possible to the Project Site on the proprietor's overall landholding and on the</p>	All proponents should be expected to comply with noise regulations.



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lots, are far removed from any utilities, and would require the construction of an access road to both dwellings.

The location of the two approved dwellings and the proprietors landholdings in the context of the Project

Site, proposed turbine locations, and modelled 35 dB, 40 dB and 45 dB noise contours is provided in


Figure 6.2


The WAPC considerations under Clause 171R are not limited to noise effects at these future potential land uses, and should also consider wider social, economic and climate change benefits of the Project which support State, regional, and local strategies and broader aligned with the State Planning Framework, as discussed in this document. These include:

- provision of renewable energy that meets the increased demand for electricity in the State
- reduction of greenhouse gas emissions through energy production and adaptation to climate change
- provision of jobs and investment in rural communities, including the provision of the community benefit fund
- diversification of the local rural economy, whilst maintaining the ability to continue existing agricultural uses.

The above benefits provided by the Project are strongly aligned with multiple provisions of the Planning Framework as described in the above **Sections 6.1 to Section 6.3.**



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	<p>On the basis of the above, it is considered that these two dwellings with approved DAs should be discounted in the context of amenity effects on the future land uses.</p>	
P112-113	<p>The potential for views within 30 km of the Project was considered and sixteen viewpoints were selected to represent the views of identified receptors including:</p> <ul style="list-style-type: none">• Residents living in the rural towns of Williams and Narrogin.• Residents living on rural properties in the farmland on and surrounding the Project.• Farmers and other people working in the rural landscape around the Project.• Visitors and workers at Narrogin Aerodrome, including recreational 'gliders', and to a lesser extent visitors and staff at Dowerdy Wines.• Recreational users of the landscape, including those visiting Dryandra Woodland National Park, Foxes Lair, Contine Hill Lookout and Picnic Area, Lions Lookout and Yilliminning Rock.• Motorists (including tourists) using roads within the Study Area including the Albany Highway, Williams-Kondinin Road, Clayton Road, Cowcher Road and Curnows Road. <p>The LVIA determined there to be no significant impacts to identified receivers with the exception of passing motorists on Williams-Narrogin Road where close views toward turbines are possible (although existing roadside shelterbelts contribute significantly to reducing the availability of these close open views toward the infrastructure). Turbines will be visible against the backdrop of rolling hills and introduce new,</p>	<p>The visual impact of infrastructure like turbines and transmission lines is real issue for the public, which value the rural amenity and natural landscape.</p> <p>It is natural that the public wants to know what things will look like, and all proponents like Neoen should produce 3d animated models to enable the public to better visualise and understand what is proposed.</p>



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	<p>dominant visual elements into what is currently a relatively undeveloped and typical rural landscape (Lat Studios, 2024).</p> <p>For further details, including the assessment of visual sensitivities and magnitude of change from key viewpoints, refer to Appendix I.</p>	
P 116- 117	<p>Interference with point-to-point links is considered unlikely, based on diffraction exclusion zones calculated by DNV for fixed point-to-point links passing over the Project boundaries and consultation with operators of these links.</p> <ul style="list-style-type: none">• There is the potential for interference with point-to-area style services such as mobile phone signals, radio broadcasting, and terrestrial television broadcasting, particularly in areas with poor or marginal signal coverage. If interference to these services is experienced, a range of options are available to rectify difficulties. It is worth noting that cellular service in the vicinity of the Project Site is particularly poor and there are many areas where it is not possible to connect currently.• DNV has consulted with organisations identified in this assessment as operating point-to-multipoint services that may be affected by the Project. The Bureau of Meteorology has advised that impacts to their weather radar systems are expected to be manageable, and no concerns have been raised to date regarding potential impacts to point-to-multipoint links or emergency services operations.• Potential EMI impacts on other services such as trigonometrical stations and survey marks, satellite	<p>It is true that certain cellular services are poor. Interference if it occurs could make that worse.</p> <p>Neoen says if interference to these services is experienced, a range of options are available to rectify difficulties, but it is not clear what those options are.</p>



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television and internet services, and CB radio, are not expected or are considered to be minor.

Regards



Peter Stubbs
Chief Executive Officer
Shire of Williams