

8 August 2025

The Hon. Sonya Kilkenney MP
Minister for Planning, Victoria

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Copy to:

Impact Assessment Unit
Department of Transport and Planning, Victoria

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Dear Minister Kilkenney,

RE: Request for Advice from the Minister for Planning under Section 8(3) of the Environment Effects Act 1978

BLWF Nominees Pty Ltd (Squadron Energy) is the Proponent of the proposed Ballyrogan Wind Farm Project (the Project) which is a large-scale renewable energy project located in Western Victoria, approximately nine kilometres south of Ararat.

The Project consists of a proposed wind energy facility, comprising of up to 128 wind turbine generators, a battery energy storage system (BESS) and approximately 45 kilometres of overhead transmission line linking to the proposed Terminal Station at the Western Renewables Link. The Project Area covers approximately 14,374 ha and is located within the Grampians' Central Highlands Region in Western Victoria (see Figure 1).

A pre-referral meeting was held on 27 May 2025 with the Impact Assessment Unit (IAU) of the Department of Transport and Planning (DTP), the Department of Energy, Environment and Climate Action (DEECA) and the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW). During this meeting, the proponent and their lead consultants presented the current Project design, an overview of the existing conditions at the site and summarised the key findings of technical assessments completed to date.

The Proponent seeks the advice of the Minister pursuant to section 8(3) of the Environment Effects Act 1978 (EE Act) as to whether an Environment Effects Statement (EES) should be prepared for the Project. It is forecast for the Proponent to submit a comprehensive EES referral to the Minister in October 2025 with the necessary detailed information to provide the advice under s8(3). This will be supported by the technical assessments listed below, prepared in accordance with the Ministerial Guidelines for Assessment of Environmental Effects.

At this stage, based on the studies prepared, it is our view that a decision under s8B(3)(b) of the EE Act that an EES is not required, as an appropriate pathway for this project. This is noting that a range of

matters as addressed by technical impact assessments are best aligned with and considered under the Planning and Environment Act 1987 (not the Environment Effects Act) to inform the planning permit decision for the Project.

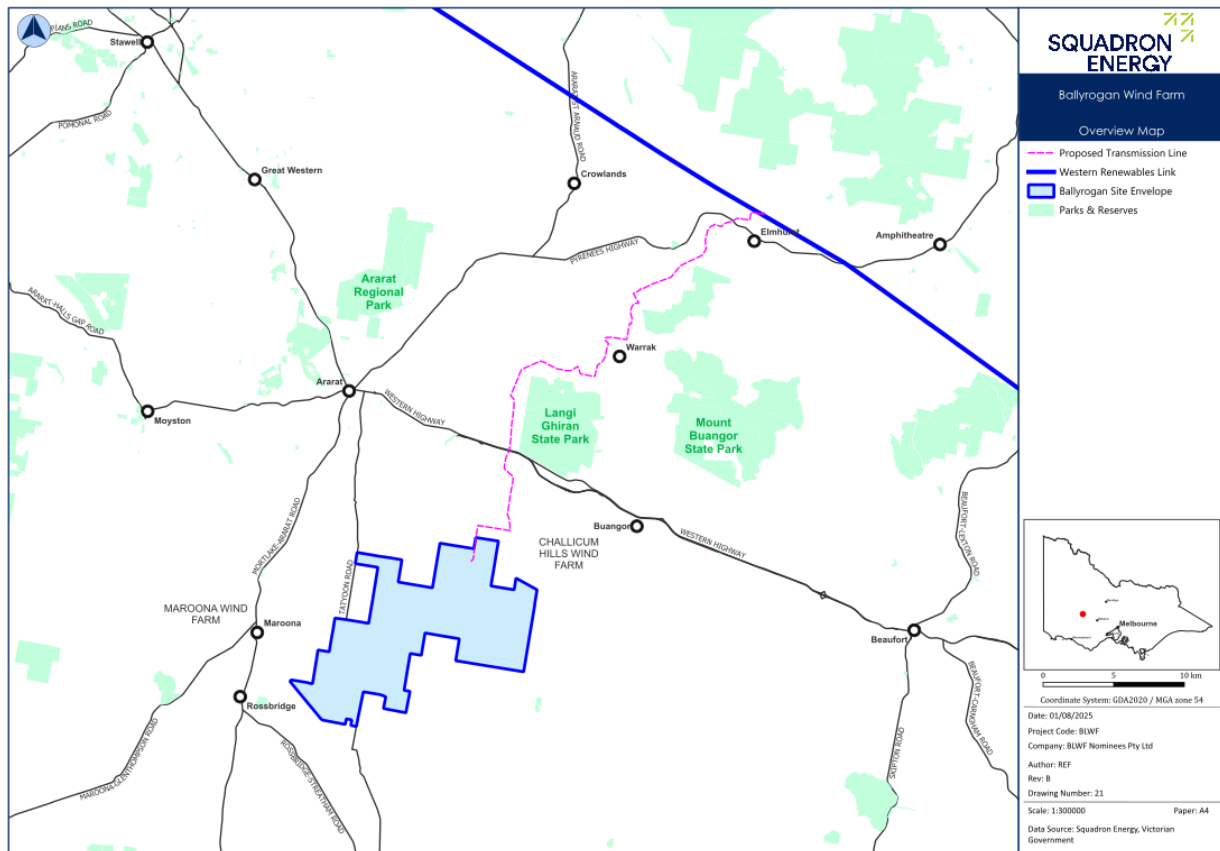


Figure 1 Ballyrogan Wind Farm Site Context

About the Proponent

The Proponent, BLWF Nominees Pty Ltd, is within the Squadron Energy group. Squadron Energy is Australia's leading renewable energy company that develops, operates and owns renewable energy assets across three States. Squadron Energy is 100% Australian owned and has 1.1 gigawatts of renewable energy in operation and 900MW under construction. In Victoria, Squadron Energy owns and operates the Murra Warra Wind Farm and is developing the Moreton Hill Wind Farm. The Proponent is developing the Ballyrogan Wind Farm with its delivery partner, RE Future.

Site Selection

The Project has been sited based on the following rationale:

- A local government that are supportive of wind farms.
- A strong and consistent wind resource.
- Proximal access to the electricity network with ability to connect to the Western Renewables Link a secured transmission line to the north of the site, with access via an approximately 45 km transmission route.

- Gently undulating terrain throughout the Project site, with some discrete areas of small steeper hills in the north-east of the site, generally facilitating the construction of a wind farm as well as providing natural screening from surrounding viewpoints at topographic highs.
- Compatible land uses and zoning (farming) for a wind farm and utility installations, with land largely cleared historically of native vegetation.
- The surrounding area has a relatively low population density, resulting in suitable distances between Project infrastructure and dwellings to minimise potential amenity impacts.
- Proximity to existing transport networks as well as the presence of existing access points to the road network.
- Ability to avoid or minimise impacts on environmental values.

Project Objectives and Benefits

Key Project objectives and benefits include:

- Renewable energy generation of over 4.0 Twh per annum equivalent of supplying 850,000 households per annum and reducing greenhouse gas emissions by 700,000 tonnes of CO₂ annually. This is a significant contribution to the State and Federal emission reduction and renewable energy targets (95% renewable energy by 2035 in Victoria and net zero emissions by 2050 for Australia).
- The ability to be shovel ready by 2030 subject to planning pathway.
- Significant economic benefits at a local, regional and wider State scale including creation of up to 650 full time jobs during construction and approximately 65 during the operational life of the Project.
- Approximately \$32 million¹ in community benefits through the Community Investment Program over the life of the Project, in addition to host landowner and neighbour agreements providing income diversity and security for agricultural communities.
- Financial returns to Ararat Council estimated at \$48.5 million² (through the PiLoR scheme).

Assessments Completed to Date

Substantial work has already been completed on both the design development and technical assessments which commenced in 2020 for the Project resulting in a high degree of avoidance and minimisation of impacts for a project of this scale. Following community consultation, the overall project size has been reduced and the layout adjusted to provide greater buffers in response to feedback received.

The following assessments have been undertaken, and reports are being reviewed to inform the Project referral submission and future approvals:

¹ Straight line - excludes annual indexation

² Straight line - excludes annual indexation

- Aboriginal Cultural Heritage Management Plan Desktop – Ballyrogan Wind Farm External Transmission Line (Eastern Marr Aboriginal Corporation), prepared by Jem Archaeology Pty Ltd (2025)
- Aboriginal Cultural Heritage Management Plan Desktop - Ballyrogan Wind Farm External Transmission Line (First People's State Relations) prepared by Jem Archaeology Pty Ltd (2025)
- Aboriginal Cultural Heritage Management Plan Desktop – Ballyrogan Wind Farm prepared by Jem Archaeology Pty Ltd (2025)
- Aviation Impact Assessment, prepared by Aviation Projects Pty Ltd (2025)
- Ecological Assessment, prepared by EHP (2025)
- Flood Impact Assessment, prepared by Water Technology Pty Ltd (2025)
- Environmental Noise Assessment, prepared by Marshall Day Acoustics Pty Ltd (MDA) (2025)
- Geomorphology Assessment, prepared by Environmental GeoSurveys Pty Ltd (2025)
- Historical Heritage Assessment, prepared by Jem Archaeology Pty Ltd (2025)
- Preliminary Geotechnical Assessment, prepared by WSP Australia Pty Ltd (WSP) (2025)
- Preliminary Landscape & Visual Impact Assessment, prepared by Moir Landscape Architecture Pty Ltd (Moir) (2025)
- Preliminary Social and Economic Impact Assessment, prepared by Ethos Urban (2025)
- Traffic and Transport Assessment, prepared by Impact Traffic Engineering Pty Ltd (Impact) (2025)
- Fire Risk and BESS Hazard Assessment, prepared by Fire Risk Consultants Pty Ltd (2025)
- Stakeholder Engagement Plan, Squadron Energy (2025)

Further studies will be undertaken, and technical studies will be updated in response to any design changes as further optimisation is considered and ongoing consultation conducted. The Cultural Heritage Management Plan (CHMP) standard assessment began in winter 2025 to inform the upcoming complex assessments which will be completed to inform the future planning submission.

Request for Advice

Regarding the details of the Project provided herein, and following receipt of the formal Referral documentation we request that the Minister provide advice to the Proponent under Section 8(3) of the Environment Effects Act 1978 as to whether an EES should be prepared.

We welcome the opportunity to discuss this further should you have any questions on the above.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Funnell', with a stylized, cursive script.

Caroline Funnell

Victorian Environment Team Manager, Umwelt

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