



Submission - Boco Rock Wind Farm Modification 1

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The Australian Wind Alliance supports the Section 4.55 modification to the Development Consent for Boco Rock Wind Farm Stage Two.

About AWA

The Australian Wind Alliance (AWA) is a community based organisation that has over 700 financial members and more than 11,000 Facebook followers. Our members include landholders, farmers, small businesses, and members of the community, including many neighbours to existing wind farms. The Wind Alliance encourages best practice community engagement and supports wind farms for the contribution they make to reducing Australia's carbon emissions and the benefits they bring to regional Australia.

Comments on Environmental Assessment

We note that this application is for the modification of an existing permit and therefore the assessment is not of the project itself but rather of the impact of the proposed modifications on that permit. We further note that the first stage of the Boco Rock Wind Farm has been in operation since 2015 and this has enabled the proponent a substantial opportunity to understand the local situation in regard to community and amenity issues as well as habitat and other issues.

The central modification requested is a reduction in the number of turbines in the Yandra cluster, from 32 down to 20, with increased tip heights to 200m. A lower number of larger turbines is a trend we are seeing across the industry, as larger, higher efficiency machines drive down the cost of wind power for consumers. The lower number of turbines is an improvement in the visual and noise amenity of the project made possible through technical advances and should be supported. At the same time, an increase in rotor swept area

increases the amount of clean energy generated and reduces the cost of that energy and this should also be supported.

Importantly, the community engagement undertaken by the proponent is comprehensive with an open day, face-to-face meetings and presentations to community groups and Council. The offer of neighbour agreements out to four kilometres is particularly noteworthy and exceeds standard industry practice. The almost universal take-up of these agreements suggests engagement has been genuine and has accommodated neighbours' views and concerns. While we are aware of some lingering community opposition, we note that there is also considerable interest from local community and businesses in job and contracting opportunities associated with the project.

Under existing permit conditions, the proponent will contribute an extra \$2,500 for each of the proposed 20 turbines to the Community Enhancement Fund managed by Snowy Monaro Regional Council. In 2019 dollars, this equates to an additional \$59,000 per annum to bring the total fund up to around \$250,000 per annum for community projects in the area, which is a significant contribution. We understand that the most recent round of grants attracted applications totalling around \$1 million which suggests there is considerable demand for these grants.

The modification makes other improvements on the existing permit:

- We welcome the 13 hectare reduction in clearing gained from the removal of the allowance for 'disturbance' around access tracks in the original permit.
- Offers of screening for mitigation of visual impact to neighbours out to 8 km is strong by industry standards.
- While turbines are increasing in size, the noise contour modelling suggests that the proposed turbines will emit less noise than their smaller, less powerful predecessors. Noise limits are predicted to be met at all receptor sites.
- The populations and behaviour of birds and bats in the area are now well understood from extensive monitoring over a period of time so projections can be expected to be solid. While there is projected to be increased risk for some high-flying, non-threatened species, the increase in height of the rotor swept area also reduces risk for other species and on balance, the modification appears to be an improvement for birds and bats.