

Toby Philp - FW: Landscape and Visual Impact Assessment

From: [REDACTED]
To: <Toby.Philp@planning.nsw.gov.au>
Date: 4/03/2013 11:08 PM
Subject: FW: Landscape and Visual Impact Assessment

We wish to respond to your Landscape and Visual Impact assessment Report for Yass Valley Wind Farms Pty Ltd.

The statement that Wind Farms have overall community support does not agree with the CSIRO publication **Exploring community acceptance of rural wind farms in Australia: a snapshot by Nina Hall, Peta Ashworth and Hylton Shaw CSIRO Science into Society Group • 2012** which states “The media analysis of 49 articles from 19 newspapers in the second half of 2010 found more reasons for wind farm opposition were reported than reasons for support. The most cited reasons for rejecting wind farms were landscape change and visual amenity impacts, noise impacts, and poor consultation.”

Our concern is that your assessment does not appear to recognise the widespread visual impact from 148 massive towers, 150 metres high, over productive farming land and you appear more concerned with the impact the [Yass Valley Wind farm will have on tourism and traveller amenity](#).

We also disagree with the statement that the “likely cumulative visual impact is probably low for residential dwellings where towers will have a dominant effect on the landscape”. Everyone but the host farmers are horrified at your insensitive and arrogant assessment. Other aspects including noise, effect on native fauna, health concerns and lowering of land values are of equal importance and must also be considered. A great many people in any population these days have compromised immune systems for various reasons, and they especially are very likely to be afflicted with health problems, apart from others who also become vulnerable to the insidious effects of the wind farms. A major concern that has recently manifested itself in the local community is the ban imposed on aircraft operating within one kilometer of towers. The Yass Valley and Harden Shires have lost over 17,000 ha and tens of thousands head of livestock to January 2013 fires. Aircraft, both fixed wing and helicopters, were of major assistance in controlling these fires in conjunction with crews on the ground. As the topography of much of the area selected for turbines is difficult for ground crews to reach, the need for aircraft assistance is paramount. I would like to quote one fire captain who said he would not send in crews without aerial support. The effects of these fire fighting restrictions are devastating and have not been considered in your assessment.

Your assessment of the cumulative visual impact of the Yass Valley Wind Farm has concluded that there would be minimal cumulative visual impact and that the changes to peoples’ perception of the surrounding area would not be significantly changed by the presence of multiple wind farms in the locality. A number of public meetings have indicated otherwise and the effect on the occupants of over 200 dwellings in the viewpoint area is substantial and we can only support a further detailed assessment where all the community becomes involved.

[REDACTED]

[REDACTED]

NSW Planning

Re Yass Wind Farm

Dear sir,

My name is [REDACTED]. I own a property called [REDACTED] on the southern border of the Coppabella Hills section of the Yass Wind Farm project. This is the second letter that I have written to NSW Planning.

I am not against wind farm developments but I do not like the way that the developer has gone about things regarding this project, and I do not believe that they should be rewarded with an approval. Even though I have two residences within 4 to 5 km of the turbines and we will be viewing up to 75 towers from our homes, my manager on the farm and I have not once been approached by Epuron to discuss their proposal.

I was able to have a meeting with Origin when they were involved. They promised me that the number of towers would be reduced, however I am dismayed to see that under the new application the number of towers has been increased in the Coppabella section. They also promised me a photomontage from my residences and this has not been produced. I think the closest photomontage to my place is SVP2, which overlooks the western part of Shepstone Park, but I am worried that my residences will view many more turbines than this.

My original letter raised the objection of loss of visual amenity. In regards to this issue I do not believe it is valid for the developer to say that the majority of people do not object to wind turbines. The point is – I have to live next to this development and I will be losing my visual amenity. I bought Shepstone Park as a retreat from the city and I specifically chose this farm for the way the homestead was positioned to take in the panorama of the beautiful Coppabella ranges. This development will replace the natural beauty with an industrial forest of twirling machines.

This raises the issue of loss of value. I bought Shepstone Park for its peaceful natural amenity. This project will take that away. Therefore this project makes Shepstone Park less attractive for me or any other potential buyer. Therefore it must decrease the value of my property. No compensation for this loss has ever been offered by either developer. Why couldn't every resident within sight of the development be offered free electricity as compensation for their losses.

I believe that the way Epuron has managed community relations is very divisive and dangerous. My understanding is that the developer has paid the people that will have turbines on their land not to talk to other residents. This has created mistrust and suspicion. Rural communities rely on neighbourhood trust in order to function. Farmers rely on each other for issues like:

- Weed control
- Vermin control
- Fencing
- Livestock returns
- Security
- Bushfire control

Our community recently experienced terrible bush fires that burnt tens of thousands of acres and thousands of livestock. This would have been far worse with a lot more property destruction if not for the community rural fire brigades. This is where farmers leave their own properties in a bushfire to risk their lives to save the property of their neighbours. And after a disaster like this the community bands together to help out devastated farmers with donations of free fodder and agistment.

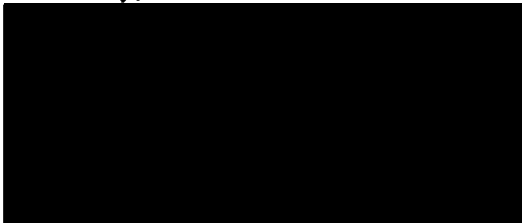
The danger of Epuron's approach to project development is that the community will be divided. There will be the farmers who are not talking and being paid to have turbines that will negatively impact on their neighbours, who will get nothing for their troubles. What will happen in the next bush fire? Will the fire captain choose to defend other properties rather than the farms with the turbines?

I am aware that there are many large wind farm developments seeking approval on the Southwest Slopes. If NSW Planning allows projects to be developed and approved in the manor in which Epuron has gone about it, they will be responsible for an enormous dysfunctional region of the rural community. Epuron must be sent back to engage with the community with full transparency and disclosure. The developer must accept that there will be adverse impacts for all residents and some level of control and compensation must be negotiated.

One issue that has not been addressed in the application is health problems associated with wind farms. We have heard stories of sub-sonic sound waves and depression problems. There are many children that will be living close to this project and we need assurance that there will be no adverse health issues. It is not good enough to say that the government is not aware of any problems. NSW Planning should give residents information based on actual experience in other locations.

I believe that NSW Planning should reject the application until the developer starts engaging with the full community in an open and equitable fashion.

Sincerely,



Toby Philp
Major Infrastructure Assessments,
Department of Planning,
GPO Box 39,
Sydney NSW 2001

1 March 2013

Dear Mr Philp,

RE : Objection - Yass Valley Wind Farm proposal Application Number: MP08_0246

I'd like to thank the Department for contacting me regarding the PPR via letter (Neville Osborne, dated and postmarked 7-12-2012).

I am currently recovering from 6 months of intensive chemotherapy treatment and therefore have not had time to study all 280 pages of the PPR. Therefore I am unable to make detailed comments at this stage. I can make comment on some issues :

POOR COMMUNITY CONSULTATION BY EPURON

The proponent Epuron contacted me via post, 3 weeks **after** I was contacted by the Department, in the form of a "December 2012" newsletter (postmarked 28-12-2012) informing me the PPR was placed on exhibition 2 weeks previously. Another example of Epuron's poor community consultation, and I would also note that the timing of the PPR's exhibition is just before a major public holiday.

ENVIRONMENTAL ISSUES – BOX GUM GRASSY WOODLANDS

Box-Gum Grassy Woodland habitat has been identified as endangered and vulnerable on NSW state and national registers. NSW state and federal governments have committed millions of dollars towards conservation and preservation strategies for BGGW habitats, such as the 'Caring for our Country' and stewardship incentives.

With many overseas research studies documenting the negative impacts wind turbines have on fauna and natural habitats it is clear that the establishment of wind farms in and around BGGW areas will further fragment this habitat, hinder biodiversity and have a detrimental impact on many of its endangered species, many of which are migratory. There is no peer-reviewed scientific research on mitigation strategies to offset the impact of industrial scale wind turbines on BGGW habitat.

NOISE AND HEALTH

Important developments in wind turbine noise and health are being studied by the federal department Health Canada (10 February 2013) and these are not addressed in the PPR:

http://www.hc-sc.gc.ca/ewh-semt/consult/2013/wind_turbine-eoliennes/research_recherche-eng.php

http://www.hc-sc.gc.ca/ewh-semt/consult/2013/wind_turbine-eoliennes/index-eng.php

In addition the Acoustic Ecology Institute publishes a well balanced report on wind farm noise each year, as well as providing pdf files of a number of key papers on wind farm noise:

<http://www.acousticecology.org/wind/>

LOCAL CLIMATE IMPACTS

There is continued scientific research showing significant local meteorological effects from large scale wind installations that are not addressed in the PPR :

http://windland.ch/doku_wind/klima/Impacts_land_surface_temperature_zhou.pdf

<http://www.atmos.illinois.edu/~sbroy/publ/jweia2011.pdf>

<http://www.pnas.org/content/107/42/17899.full.pdf>

http://digilib.gmu.edu:8080/jspui/bitstream/1920/7878/1/Walsh-Thomas_thesis_2012.pdf

http://folk.uib.no/ngfib/Fitch_etal2012.pdf

http://globalchange.mit.edu/files/document/MITJPSPGC_Rpt175.pdf

I reserve the right to provide the Department further detailed comment on the PPR subsequent to today. I strongly urge the NSW Dept of Planning to reject this proposal.

Yours sincerely

[Redacted signature]

[Redacted contact information]

Submission in response to:

Yass Valley Wind Farm – Submissions Report
Landscape and Visual Impact Assessment
For: Yass Valley Wind Farm Pty. Ltd
0092376 RPT2 Final
December 2012

To Whom It May Concern:

I am writing in response to the proposed Yass Valley Wind Farms to be developed by the company Epuron in the Bookham region. I live at 135 Illalong Rd Bookham and have been informed by the above company (only upon request by myself via email) that our property is located 3.3km from the nearest wind turbines to be constructed on the Coppabella Ranges, and some 3.8km from the turbines to be erected on the Marilba Hills.

The company Epuron in relation to any developments has never contacted me; I have recently made efforts of my own to make contact and have received vague answers to the date of construction etc.

I submit that the company assessment is patently incorrect and deliberately confusing in its language and the assessment regarding the visual and overall cumulative visual impact on the residents. I have included the following statement copied from the above impact statement and defy anyone to understand it:

6.2 Overall cumulative impact

This assessment of the cumulative visual impact of the Yass Valley Wind Farm has concluded that there would be minimal cumulative visual impact and that the changes to peoples' perception of the surrounding area would not be significantly changed by the presence of multiple wind farms in the locality.

However there would be no change to the assessment if these were not constructed as any impact that does occur, is present because of the adjacent location of the Marilba Hills Precinct and the Conroy's Gap Wind Farm. The presence of the Coppabella Precinct adds little to the (minimal) cumulative impact of the wind turbines at these two locations.

This nonsense was directly drawn from their impact statement – need I say more.

Therefore, I write on behalf of myself and my husband from ground zero of this proposed windfarm to object in the strongest terms to its construction on the grounds that it will have a severe and detrimental effect on our lives via its high visual impact, the destruction of the night sky with aircraft lighting, the reduction in the valuation of our property, the as yet unknown and untested potential health risks of these turbines, and the lack of clear and professional assessment of the environment if it is based on the above document which I have read in its entirety.

I would appreciate a response to this submission with information as to the avenues left open to us to fight this inefficient and obtrusive construction that appears to be being thrust into our lives without any discussion with us,

Sincerely,

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Nathan Stringer

From: [REDACTED]
Sent: Thursday, 26 June 2014 2:08 PM
To: Toby Philp
Subject: FW: Yass Valley Wind Farm Project - Grogan (M42) concerns

From: [REDACTED]
Sent: Thursday, 26 June 2014 1:48 PM
To: 'toby.philip@planning.nsw.gov.au'
Cc: [REDACTED]
Subject: Yass Valley Wind Farm Project - Grogan (M42) concerns

Hi Toby,

Thanks for talking to me today.

As discussed my husband and I have some concerns with the Yass Valley Wind Farm project.

As I mentioned we have been in our house since the end of 2012, building commenced early 2012, building approval was granted in late 2011 (I think?). The first contact we had with Epuron was after my father-in-law (Michael Grogan) told them they needed to consult with us. They met with me in April 2013 and showed a map of proposed towers to the south of our house. In that initial meeting Epuron told me they didn't know that we were here and now that they did it was unlikely that many of the towers behind us would go ahead because they were so close to our residence. I contacted Epuron this week to find out what was happening with the project and was sent a map showing 6 turbines and one sub-station within 2 kms of our residence, which was not what I expected. I haven't read their July 2013 visual amenity and noise reports in detail, but after an initial look, have some real concerns.

A summary of our concerns is below:

- Visual impacts – the visual assessment deems the impact on our living areas to be low to negligible, however we have 7 large windows on the southern side of house (one of which is in our “living area”). Two of these windows are 1.5m x 1.5m and face south and south/east. In the meeting with Epuron we were told that these windows would be considered in the visual assessment. They are not mentioned in their report. My husband has serious concerns about the impact to our visual amenity given the closest tower is just over 1 km behind our house to the south. We also spend a lot of time outside the house on the southern side in the summer and would be visually impacted by the turbines.
- Noise - I have concerns with the validity of the noise monitoring undertaken to determine back ground noise at our residence. The battery went flat on the machine in the first round of monitoring and the second round the microphone fell over. Other concerns are outlined below.
 - Meteorological conditions monitoring was not undertaken during the survey period. Bowning BOM station was used which is about 15/20 kms away.
 - In appendix G it states about our residence (M42), “Marshall Day was not involved in the noise monitoring or determining which data to exclude for the analysis. Noise data has been excluded based on Epuron’s advice, and then processed to generate the regression curves for the data set. The reliability of the data is the responsibility of Epuron.” My question would be does Epuron have the qualifications to undertake the monitoring and exclude data? Secondly is it appropriate for them to be doing the monitoring, shouldn't they have an external consultant?
 - My main concern is in Appendix J (Figure J1) which shows that the night time criteria is exceeded at our residence, yet Table 6 (page 12) states that worst case predicted levels for relevant receivers are compliant for all wind speeds at our residence (M42). I raised this with Epuron when they provided me with the noise report, but didn't hear anything back. If the night time noise limit criteria is not met at our residence I would like to know what Epuron propose to do about it.

- Consultation – I have concerns with the consultation process. Epuron first contacted us after my father in law suggested they do so. I met with them in April 2013, which is after the opportunity for us to submit a formal submission on the project had passed. The next consultation that I have had with them is this week when again I contacted them to ask what is going on with the project and impacts to our residence. We have also previously asked if we could attend the community consultation meeting, but were told we couldn't. I would have thought that it shouldn't be our responsibility to consult with Epuron, but the other way around. In saying that, Epuron has always been cooperative and willing to talk to us when we have contacted them.

I have also contacted Epuron and made them aware of the above concerns that we have.
Thank you for your time. I will call you in a week or so to find out what happens in regards to our concerns in relation to the planning approval process. If you have any questions please feel free to contact me.

[REDACTED]

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Yass Valley Wind Farm Submission May 2013 on Aerial Agriculture Impacts

**To: Toby Philp, NSW Department of Planning and
Infrastructure**

**Compiled by: [REDACTED], Bookham,
NSW, 2582**

Background:

Epuron is seeking to establish a wind farm in the Coppabella, Marilba and Conroys gap area, otherwise referred to as the 'Yass Valley Wind Farm'. It already has DA approval for 15 turbines south of Conroys gap.

Pages 162-164 of Epurons Environment Assessment (November 2009) report attempts to cover Aircraft Hazard Impacts. The report however does not cover the hazards encountered by aircraft whilst flying in air turbulence. The report also fails completely to address the impacts on agriculture.

Talbragar is a sheep farm in the Shire of Harden covering 730 Hectares. The property encompasses 2 lots, Lot 26 DP 748158 and Lot 177 DP 753592. Talbragar has a long history (over 40 years) of spreading Super Phosphate by air and has its own landing strip, clearly marked on the map on page 164 of the Environment Assessment report.

Aerial Issues:

The Aerial Agriculture Association of Australia (AAAA) has recommended that its members do not fly in areas with wind turbines. The aerial risk is not solely with aircraft coming in direct contact with the wind towers but with the turbulence created by large arrays of these turbines. This effect on the air can extend over 20 Kms downwind of turbines. Aerial agriculture operations are carried out close to the ground (where turbulence is greatest) and often with fully loaded planes.

See attachment below which lays out the recommendations of AAAA.



AAAA.pdf

Talbragar employs the services of Yass Air PTY Ltd to spread super phosphate. As the landing strip is in the middle of the property aerial spreading is very efficient. The aircraft can spread super at the rate of 8 tonnes per hour. The airstrip can only be accessed from the north. When operating the aircraft takes off in a northerly direction, and when it has gained sufficient height, about 1 Km north of the Hume highway turns to the right and circles the property in a clockwise direction spreading super phosphate before landing and reloading, turnaround time is about 7 minutes.

The chief pilot of Yass Air, Ted McIntosh, has stated that if the Yass Valley wind farm is constructed then he would be unable to spread super phosphate at Talbragar due to wind turbulence. He stated that he recently got caught in severe turbulence about 10 Kms downwind of the Gunning wind farm and that was on a day with very little wind.

The predominant winds at Talbragar are either from the North West or the East both of which would prohibit using the landing strip. The main

issue is that the aircraft has to gain sufficient height with a full load, and in order to do so needs to fly in a northerly direction, into the wind turbulence which will be created by the wind turbines. Depending on the wind direction the wind turbulence would most likely impact the air directly over Talbragar, further complicating the operation of aircraft. Southerly winds are generally too strong to enable aerial spreading.

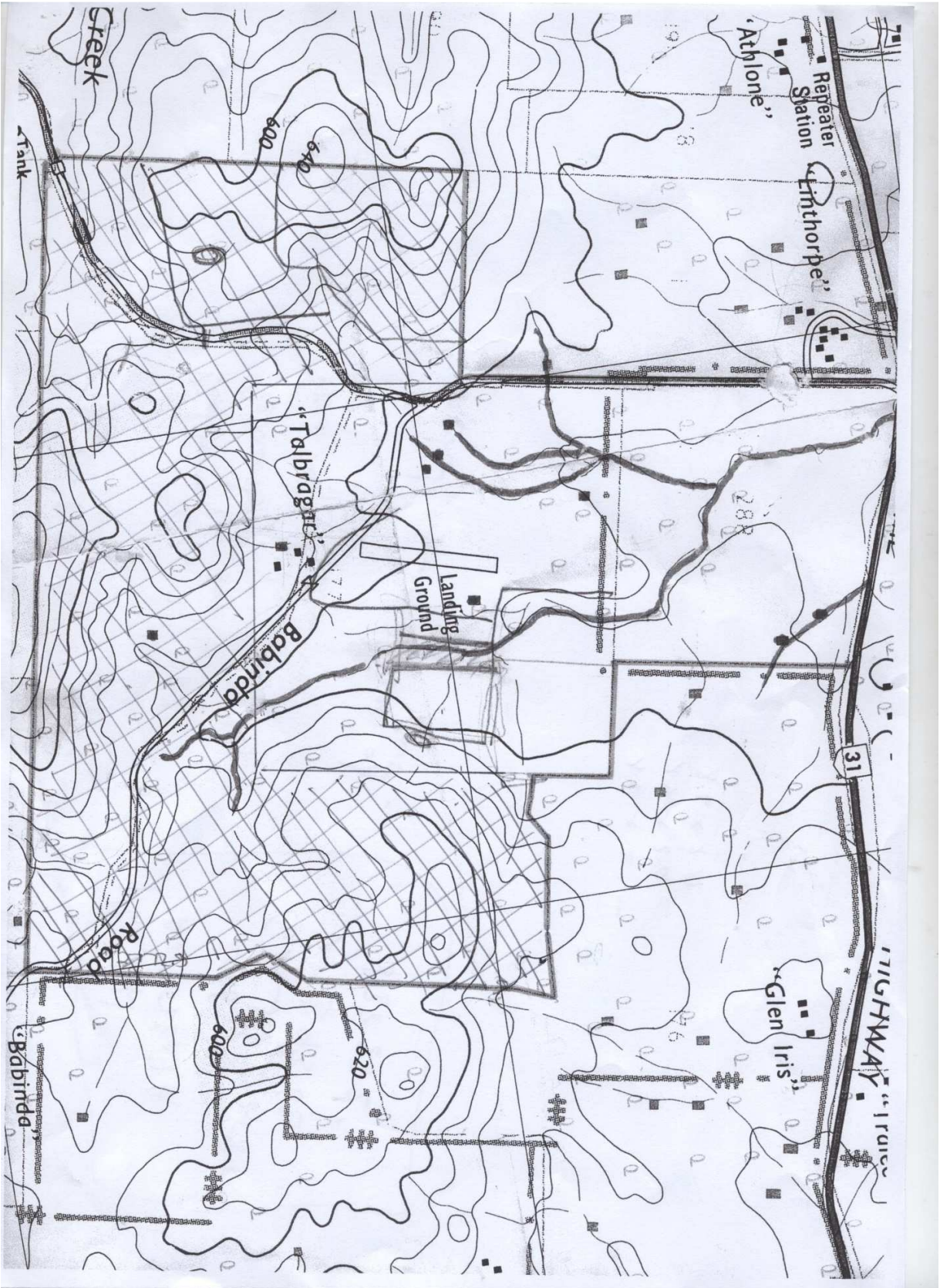
Economic Impacts:

There has been a long running Super phosphate trial carried out on a neighbouring property by the NSW Department of Primary Industries. This trial attempts to quantify the economic returns of regularly applying phosphate, and moreover has a direct correlation with the operation at Talbragar as both the soil types and farming practices are the same. See attachment.



Bookham Summary
Pack 2012 (2).doc

The map below shows the area of Talbragar where super phosphate is spread by aerial application (hatched). The map is oriented to the west. Due to the terrain being both steep and rocky there is no other economic method of spreading super phosphate other than by air. It is estimated that 56% of the pasture at Talbragar has phosphate spread by air. In the Bookham grazing trial the \$/hectare increased profit by using phosphate is calculated at \$78.76 (13 year average) as of 2006. If this number is compounded up by 2.5% being the Reserve Bank of Australia's targeted rate of CPI then in 2013 that increased profit is \$93.62. Taken over the area of Talbragar where spreading is aerielly applied that equates to a direct impact on net revenue of \$ 38,272 per annum.



Epurons Response:

This issue was directly raised with Epuron on 4th April 2013 at the Community Consultation Committee. There has been no response from Epuron.

Regional Impacts:

Within the vicinity of the proposed Yass Valley Wind Farm there would be a large number of properties that rely on aerially spreading of phosphate. It is estimated that within 10Kms of the proposed wind farm a total of 10,000 hectares of pasture has super phosphate spread aerially. Using the results of the Bookham Grazing trial run by the Department of Primary Industries and extrapolating the results over the larger area that would have an economic impact of up to \$ 1 million per annum on agricultural returns.

Summary:

Epuron has completely failed to address the issue of aerial agricultural activities in the Yass Valley.

The economic impacts are real, substantial, and supported by ongoing research by the NSW Department of Primary Industries. In most cases there is no alternative method of spreading super phosphate other than by air.

The dangers to aircraft operating near wind turbines is significant with a number of accidents and fatalities being recorded overseas. The issue of air turbulence needs to be urgently addressed by the NSW Department of planning when assessing this proposal.

Should the proposal be approved then the NSW Department of Planning must address the issue of compensation to affected farmers.

Submission in response to:

Yass Valley Wind Farm – Submissions Report

Landscape and Visual Impact Assessment

For: Yass Valley Wind Farm Pty. Ltd

0092376 RPT2 Final

December 2012

I wish to refer to page 26 section 6.1.4, where it is suggested that the cumulative visual impact is probably low. My property on Bogolara Rd, Bookham is within 4 kms of the nearest turbine. We are building a new house within 6 kms of the nearest turbine and the aspect of the house takes in the views to the Coppabella range. The visual impact will be high and very significant. To compound matters Epuron never contacted us or sent us a newsletter in contradiction to their statement in the EA. Had they done so we could have built the house in another site thus alleviating the issue of the high visual impact. I estimate that we will be have in excess of 25 turbines in view.

Section 6.2 is clearly incorrect and should be discounted.

Section 7.2 is also incorrect as approval ratings are falling not increasing as stated. Community resistance to wind farms is rising across the globe. In the UK the government has now put a moratorium on all new land based wind farms due to the rising discontent.

Section 7.3 This statement is also incorrect. 148 wind turbines must have a high cumulative impact.

Section 8. The statement that ‘the proposed Yass Valley Wind Farm will have a generally low visual impact on its surrounds, and that the site is a suitable landscape for the construction of a wind farm’ is clearly ludicrous and plainly wrong. How can the planting of 148 massive 200 m high wind turbines in a purely rural setting be anything but have a massive visual impact. The site cannot be suitable as there are over 200 residences in the immediate area, these turbines will impact the health of those residents. The area is already in a high bush fire risk zone, these wind farms will only increase that risk. Furthermore property values will decline. Farming will be impacted as aerial operations are reduced. The local community is clearly against this development.

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Bookham

NSW

2582

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David White



From: [REDACTED]
Sent: Sunday, 3 March 2013 12:47 PM
To: ElectorateOffice Burrinjuck; office@hazzard.minister.nsw.gov.au
Cc: yassbim@activ8.net.au; eedypastoral@yahoo.com.au; mrgrogan@bigpond.com; angus.taylor@nsw.liberal.org.au; Alby.Schultz.MP@aph.gov.au; Astley Tuahy; Boorews District Landscape Guardians; bruce hazell; folkard@bigpond.com; John McGrath; Kylie Kimpton; MattBingley; mrob57@skymesh.com.au; Nick Anderson; Paul Regan; Richard Hyles; SandyCrisp; srweir@bigpond.com; stephen.h.frith@gmail.com
Subject: Re: Yass Valley Wind Farm Protest

David

Thank you for your response and we do appreciate Katrina's support for our cause, however I feel that the residents would like to see more decisive action taken to finally stop this development proposal going ahead.

Can you please ask Katrina to speak directly with the minister for planning pointing out the serious flaws in the Environment Assessment report prepared by Epuron. These flaws should give the minister sufficient grounds to reject the proposal outright and then we can all get on with our lives.

I wish to draw your attention to the Environmental Assessment report :

Section 6.2 Community Consultation

This section is totally wrong as Epuron did not consult widely with the community, newsletters were primarily delivered to potential hosts. Face to face meetings with neighboring landholders did not take place. I have met some residents who live right in the middle of the development completely surrounded by turbines that were never contacted by Epuron. They claimed to have telephoned neighboring landholders and yet I have consulted widely with the community and have yet to find anyone who was telephoned by Epuron.

Section 7.4 Flora and Fauna

This section completely fails to address the adverse impact on the raptor population and also fails to address the impact on the local bent winged bat population, an issue I have raised already with the minister for planning but have still had no response.

Section 7.7 Aircraft Hazard Impacts

A comment is made that "Due to the current land use of the proposed wind farm site, potential impacts to Ariel spraying of agricultural areas are considered negligible" this statement is absolute nonsense, on the map in this section there are 3 landing strips marked, these are not for private jets but for agricultural aircraft movement primarily for fertilizer application as well as for herbicide use. One of those airstrips is mine and I wish to refer to my comments in Section 6, why did Epuron not contact the landholders who had airstrips marked on their map to ask what these are used for. Clearly this section was written in the comfort of an air conditioned office with no attempt at any serious research.

Section 7.11 Fire and Bushfire Impacts

There is no mention in this section that aerial fire fighting will not be able to occur. aircraft will not operate within 1 km of a turbine and up to 10 km downwind. Aircraft were a huge help in the recent Cobbler Rd fire, however there help will in future be absent once these turbines are built.

Section 8.4 Land Value Impacts

Recent research shows that land values fall by on average 30% for properties close to wind turbines. In both the UK and Victoria councils have had to reduce their rates due to falling land values. The research papers Epuron has sited in this section are all dated and not relevant to the Yass valley proposal.

Section 8.10 Health and Safety

There is widespread and growing anecdotal evidence of severe health effects occurring in people living up to 10 kms from wind turbines. There is no mention of this in this section, this section needs to be completely rewritten taking into account the most recent research and observations.

There are many other flaws within the Environment Assessment report but I think any one of the above points are sufficient to reject this proposal outright and immediately.

Kind Regards

[REDACTED]
Talbragar

Attention: Andrew Wilson
Project Manager
Epuron Pty Limited
By Email: a.wilson@epuron.com.au

30 March 2013

Dear Andrew

Re: Proposed Yass Valley Wind Farm

My name is [REDACTED], and I am an environmental impact assessment specialist for a large global mining company. I am also the daughter-in-law of Michael and Rebecca Grogan, who own the property "Illalong", which abuts the northern edge of the proposed Yass Valley Wind Farm (Marilba) location.

I am not writing to become involved in the debate over whether the wind farm should go ahead. On a personal note, I am not opposed to wind farms, providing an adequate environmental impact assessment occurs, including effective management techniques and relevant and appropriate compensation. In the case of the proposed Yass Valley Wind Farm, I am concerned that the environmental impact assessment process, including the stakeholder engagement process, has not been carried out in an appropriate and compliant manner.

My discussions with both family and friends over the past few days (all of whom are either "involved" or "non-involved" community members, as defined by Epuron), have highlighted to me a number of potential areas for improvement, and it is these that I would like to outline.

My main concern, in relation to the environmental impact assessment process, is that proper process has not been followed. Specifically, a large number of community members have not been consulted. These stakeholders, defined by Epuron as "non-involved", remain major stakeholders in the proposed wind farm due to potential impacts of noise, visual amenity and a drop in land values. I have reviewed the PPR, as well as the original Environmental Assessment dated November 2009. The majority of the issues raised by these stakeholders are referred to in the Preferred Project Report dated November 2012 (PPR), however I believe the level of detail in the PPR does not adequately reflect the significant level of impacts, and the engagement process has not afforded a clear understanding of the elements addressed in the PPR, among the broader stakeholder group.

Table 1 outlines the issues that have been directly communicated to me, by non-involved community members and require clarification by Epuron. In the interests of moving forward, rather

than simply outlining concerns, I have taken the liberty of requesting specific clarification or action of Epuron in order to address these issues.

Table 1 – Issues Raised by Non-Involved Community Members

Issue	Details	Clarification Requested of Epuron
Impacted Residences	Figure 1-5 of the PPR is missing a residence that was constructed in 2012. This residence is within 1.5km of a proposed wind turbine and is therefore well within the zone of impacts from both a noise and visual impact perspective (as outlined in the 2012 EPA Infrasound Report and the 2009 Environmental Assessment). Figure 1-5 of the PPR is also scaled to exclude a number of fringing residences that are within 1.5km – 2km of the proposed turbines and therefore should be included as potentially impacted residences.	Amend the PPR to accurately reflect the residences in the area, and amend the impact assessment to include these residences. Update the stakeholder engagement to include a targeted assessment of all impacted residences.
Community Consultation	Section 3.6 of the PPR indicates that “Epuron has contacted and continues to consult with the neighbouring landowners”. This is not an accurate reflection of the number of landowners who have been consulted with. Epuron’s community engagement to date has been selective, and has not included a number of residences that are within 2km of the proposed residence site (including those of my parents-in-law and my brother-in-law) (as required by the Director General’s Requirements dated 2009). These residents will be impacted both by low frequency noise and visual amenity changes, but have yet to be consulted. A number of residents have expressed feelings of discontent and powerlessness regarding the lack of formal engagement.	Engage in all non-involved and involved landowners in a systematic and inclusive manner, particularly those whose residences are within 2km of the proposed wind turbine locations.
	Meeting held on 28 February 2013 (published minutes indicate the meeting was held on 1 March 2013 but this is an error) was not an open meeting. Concerned non-involved landowners and community members were not permitted entry to the meeting, and as a result conducted a picketing exercise outside the Yass Soldier’s Club Hall in protest. These landowners were not engaged with, and no attempt was made to understand their concerns. One non-involved landowner stated “ <i>Secret meetings where only select community members are allowed to attend divide the community and make us feel powerless.</i> ” Again, this approach contravenes the Director General’s Requirements.	Conduct community meetings in an open and transparent manner, allowing engagement with all affected stakeholders.

Issue	Details	Clarification Requested of Epuron
	<p>The agenda for the meeting held on 28 February 2013 was heavily focused on legislative instruments. A number of stakeholders have indicated that their concerns have not yet been heard, and the focus of engagement to date has not included a comprehensive collection of thoughts and concerns of both involved and non-involved stakeholders.</p>	<p>Revise the community engagement plan to include an appropriate level of preliminary engagement, to develop relationships with key stakeholders (both “involved” and “non-involved”), and to understand and document key concerns raised by these stakeholders.</p>
	<p>A number of statements in the original 2009 Environmental Assessment are disengaging, unsupported, and inflammatory, including the statement that <i>“targeted social research on perception clearly demonstrated that there is a very high level of support for wind farms amongst local residents, with 71% supporting wind farms within 1km of their residence”</i>. This social research is not specific to the Yass Valley area and is therefore misleading in its representation of the specific project area. Notwithstanding this, a 71% support ratio remains a limited majority, and a number of letters from the community referred to in the above passage (Crookwell) published in local papers (Goulburn Post, Monday 18 March 2013; Crookwell Gazette, Tuesday 19 March 2013) indicate that there remains a highly active and not insignificant group of community members who vigorously oppose the construction of wind turbines, and have not had the opportunity to discuss their potential concerns with the relevant proponent.</p>	<p>Complete a targeted social research on perception within the Yass Valley project area. See other proposed engagement activities above.</p>
	<p>Non-involved landowners, i.e. landowners whose properties are not proposed for wind turbine locations, but who are likely to be impacted by visual impacts or noise impacts, are concerned that they are not being engaged with, or that compensation discussions have not included them. In the words of a landowner within 2km of proposed wind turbine locations, <i>“Noone has come to talk to us”</i>. Further, to define landowners adjacent to the proposed project area as “non-involved” is misleading, given these stakeholders are likely to be exposed to negative impacts of the project, and while not at present involved in compensation discussions, are likely to be significantly affected by the project.</p>	<p>Engage with all non-involved and involved landowners in a systematic and inclusive manner. Address the current discrepancy between the Environmental Assessment which indicates that impacts of noise and visual amenity will be felt by non-involved landowners, and the current proposal for compensation which includes only landowners whose properties will house wind turbines.</p>

Issue	Details	Clarification Requested of Epuron
	<p>Section 10.1 outlines the process for implementation of environmental mitigation measures, including the implementation of the Construction Environmental Management Plan and the Project Environmental Management Plan. These plans are not well understood among stakeholders, and a number of stakeholders have expressed concern regarding how controls will be implemented for the project.</p>	<p>Include an explanation of the concept, detail, management and quality assurance/monitoring processes involved with the development and implementation of both the CEMP and the PEMP in community engagement sessions.</p>
	<p>Section 10.2 of the 2009 Environmental Assessment lists 93 proposed proponent commitments in order to manage the potential impacts of the project. These are not well understood among stakeholders, and community stakeholders have not been engaged with during the development of these commitments.</p>	<p>Socialise the 93 proposed commitments with both involved and non-involved community members, and address any feedback or concerns regarding the proposed proponent commitments.</p>
	<p>A number of non-involved community members have expressed their concern over visual impacts, with emotive comments such as <i>“Our pristine landscape shouldn’t be polluted with steel structures that have questionable environmental value”</i>, and <i>“I don’t want to look at them and I don’t see why I should have to when there are viable alternatives such as solar. We wouldn’t mind having solar panels on our properties, as the visual landscape would not be so dramatically changed”</i>. These comments, while emotive, indicate both that there is not a common understanding of the real (net present as well as future) benefit of wind turbines, or why the area has been selected for wind turbines over windier (but potentially more built up) areas, or why solar has not been considered. These may all be issues that can be addressed by Epuron, but have not been effectively communicated with stakeholders to date.</p>	<p>Include stakeholder engagement that adequately summarises the actual proposed benefits of the project, why Yass Valley has been proposed, and allowing stakeholders to pose questions in relation to the efficiency of the proposed turbines and their overall impact on green energy.</p>
<p>Erosion and Land Impacts</p>	<p>The PPR indicates that an erosion and sediment control plan will be implemented, utilising <i>“standard erosion and sediment control measures”</i>. A number of community members have continued to express concern over the potential erosion and sediment impacts due predominantly to the construction of access roads in steep areas and areas of poor quality. In addition, members of the community have expressed concern regarding the construction infrastructure and</p>	<p>Given this has been identified as a key area of concern for both involved and non-involved landowners, who share the same catchments, further explanation of erosion and sediment control measures, including pre-feasibility level designs, are warranted. Pre-feasibility designs for the turbine infrastructure themselves, including cement pad sizes (although Table 3-3 of the 2009 Environmental Assessment indicates a footing size of 25m x 25m, a design of the footings, including underground components, has</p>

Issue	Details	Clarification Requested of Epuron
	<p>any impacts these may have on the impacted land, as well as land downstream or in other parts of the regional catchment.</p> <p>The PPR indicates that <i>“infrastructure will be located on the ridges which are predominantly on basalt rock and less prone to erosion risks”</i>. Table 8-6 of the 2009 Environmental Assessment describes seven soil types, six of which are listed as having a high or extreme erosion potential. This contradicts the statement in the PPR, and it remains unclear how Epuron will manage this risk. Potential downstream impacts of erosion have also not been addressed in detail.</p>	<p>not been provided). This detail will assist with a realistic assessment of the impacts and communication of management techniques to community members.</p> <p>Further clarification regarding the potential erosion impacts and management strategies is required, given the results of the original soil study in the 2009 Environmental Assessment. In addition, given the size of the hard stand areas are estimated to be 900m², and the ridges in the proposed locations are often narrow, clarification is sought regarding how erosion control will be implemented in such steep conditions, particularly if ridge lines do not allow for 900m² of flat surface. Given the discrepancies in the PPR and the original Environmental Assessment, it is not possible to understand whether the current designs (which, indeed, are not provided), will adequately manage the potentially significant impacts of disturbance of highly or extremely erodible soils.</p>
Noise	<p>The Epuron website refers to a report by the Victorian EPA, which indicates that wind farms are not a significant contributor to low frequency noise, <i>“at houses located approximately 1.5km away from wind farm sites”</i>. However, the Yass Valley proposal includes a number of residences (including non-involved landowner residences) that are located within 1.5km of the wind farm sites. As such, these residences are likely to be impacted (as indeed the 2009 Environmental Assessment indicates) by noise from the wind farms.</p> <p>The Director General’s Requirements (dated 2009) requires the proponent to clearly outline the noise mitigation, management and monitoring measures. This has not been completed.</p> <p>The 2009 Environmental Assessment did not include all potentially impacted residences in the noise survey, or modelling exercise, as required by the Director General’s Requirements.</p>	<p>Conduct engagement with non-involved landowners within 1.5km of a proposed wind turbine location in order to understand the potential impacts (above 35dB(A) or 5dB(A) above background, taking into consideration the allowed 5dB(A) penalty for annoying characteristics, as outlined in the 2009 Environmental Assessment), any proposed management techniques, and any compensation where management techniques are not able to adequately reduce the noise levels at these residences.</p> <p>Amend the noise assessment to include all potentially impacted residences (according to the modelling data), including the residence built in 2012 which is within 1.5km of the northern most proposed turbine location at Marilba.</p>
Land Valuation	The PPR indicates that <i>“A number of studies in</i>	Amend the PPR to include an assessment

Issue	Details	Clarification Requested of Epuron
	<p><i>Australia and overseas have shown that wind farms do not generally have any negative impact on the value of surrounding land...</i>" and more specifically, refers to the findings of the NSW Valuer General in 2009, stating that <i>"wind farms do not appear to have negatively affected property values in most cases"</i>.</p> <p>These are general comments that do not include an assessment of land values in the Southern Tablelands that have been impacted by wind farms. The statements are not conducive to a detailed property evaluation report.</p>	<p>of land values in the Southern Tablelands in areas that have been affected by wind farms.</p> <p>Discussions with potentially impacted landowners (both involved and non-involved) must address this issue, including the potential process to address land value impacts with an appropriate compensation package.</p>
Visual Amenity	<p>Figure 5-7 (Residential Viewpoints) in Attachment 3 to the PPR does not appear to consider a number of residences in close proximity (i.e. less than 2 km of the proposed turbine locations, including the residence of my parents-in-law and my brother-in-law). The Director General's Requirements (DGRs) dated 2009 require a description of community and stakeholder values of the local and regional amenity, including <i>"perceptions of the project based on surveys and consultation"</i>. This has not been adequately documented.</p> <p>It is not clear what the definition of low, medium and high impact is, and how this has been quantified.</p>	<p>Clarification is required on the definition of visual amenity impacts.</p> <p>Attachment 3 to the PPR should be amended to include all dwellings within the vicinity (for reasonableness, at least within 2km) of any proposed wind turbines.</p> <p>Community consultation regarding perceptions of the project should be expanded to include 100% of neighbouring properties. It is not acceptable to have a survey pool of respondents that does not at least include all neighbouring and near-neighbouring landowners.</p>
Cumulative Impacts	<p>The methodology of the cumulative impact assessment does not appear to have been calibrated by the perception of cumulative impacts by potentially impacted stakeholders. Statements from the PPR relating to residents along minor roads do not adequately reflect the potential cumulative impacts to those stakeholders, including the statement that <i>"It is considered that the visual impact will be minor from these locations predominantly because the viewer numbers are low"</i>. This is somewhat akin to saying that the cumulative impact of a small car accident in which two people are killed is low, because only two people are impacted. It is an inappropriate assessment of cumulative impacts.</p>	<p>It does not appear as though the proponent has addressed cumulative impacts in a comprehensive manner. A number of formal guidelines exist in order to adequately address cumulative impacts, including the European Commission's <i>Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions</i> (1999) and those employed by the Department of Industry and Resources (WA) in its assessment of the cumulative impacts of the proposed Port Hedland port expansion.</p> <p>The PPR should be amended to include a cumulative impacts assessment according to a set of formal guidelines such as those outlined above.</p>

Issue	Details	Clarification Requested of Epuron
Management Plans	A number of commitments proposed are covered by the statement that a plan (such as a Construction Environmental Management Plan, a Decommissioning Plan, a Biodiversity Management Plan, etc.) will be developed. Given the sensitivity (both from a community stakeholder and biodiversity perspective) of the project, there may be value in providing conceptual details of these plans, in order that stakeholders can understand the measurable objectives of these plans.	Develop a summary of elements of relevant management plans for socialisation with community stakeholders, including a formal feedback mechanism.
Decommissioning and Rehabilitation	Non-involved stakeholders have expressed concerns over how decommissioning and rehabilitation will occur, particularly given the long life of the turbines, and the potential that Epuron may not be the owner of the infrastructure at the end of the project life. One landowner indicated <i>"We are hearing stories of wind turbines being left to fall down, having been sold to offshore owners. How do we know this will not happen in our district?"</i> In addition, stakeholders indicated there does not appear to be a precedent for the successful decommissioning of wind turbines globally, and therefore there was little confidence that this would be carried out effectively in the Yass Valley area.	Clarification via stakeholder engagement (with involved and non-involved landowners) is required regarding the process of decommissioning, commitments made by Epuron, including conceptual elements of the decommissioning plan and a summary of legislative requirements regarding rehabilitation and decommissioning.
	The 2009 Environmental Assessment indicates that decommissioning will include <i>"dismantling and removal of the wind turbines and all other above ground infrastructure"</i> but that <i>"Underground footings and cables would remain in place"</i> . Given the final land use involves agricultural activities, that may in time include ploughing and planting, this decommissioning plan includes a residual impact that may not be acceptable.	Decommissioning plan should be amended to ensure it aligns with final land use, where discrepancies occur.

I have copied this letter to a number of external stakeholders (see below), in the interests of maintaining transparency.

I look forward to hearing from you in relation to the above.

Yours sincerely,

[Redacted signature]

Copies to:

Andrew Durran, Executive Director, Epuron - a.durran@epuron.com.au

Martin Pool, Executive Director, Epuron - m.poole@epuron.com.au

[Redacted name]

[Redacted name]

[Redacted name]

[Redacted name]

[Redacted name]

[Redacted name]

[Redacted name]

[Redacted name]

Toby Philp – Planner, NSW DPI - toby.philp@planning.nsw.gov.au.

From: [REDACTED]
To: "Toby.Philp@planning.nsw.gov.au" <Toby.Philp@planning.nsw.gov.au>
CC: [REDACTED]
Date: 1/03/2013 8:58 pm
Subject: Submission Response to Yass Valley Windfarm

Mr Toby Philp
Department of Planning
NSW Government

Dear Mr Philp

I write to protest the proposed approval of Yass Valley Windfarm No. 0002376 Rpt 2 Final.

My wife and I are non-host owners of Bogolara, Bogolara Road, Bookham.
There has been a singular lack of appropriate community consultation regarding the proposed development of a windfarm in our district. There is significant community disquiet regarding the visual impact of the development, and the associated distraction of the pastoral landscape associated with white and yellow box woodland. The wildlife impact assessment is lacking in convincing research that might support an approval. The assessment of visual impact as in Section 6.1.4 is erroneous and misleading, diminishing the value to residents if the pastoral landscape. There has been no adequate consultation with local residents, and there appears no adequate government assessment of the community value of windfarms, which can only survive because of government subsidies. There is international resistance to windfarms on ecological, health and environmental grounds that are not engaged by the proponent, nor acknowledged by the Department. I register my protest at such a destructive industrial scale intervention into our landscape.

Yours sincerely

[REDACTED]

Bookham

Sent from my iPhone

Toby Philp - Landscape and Visual Impact Assessment

From: [REDACTED]
To: <Toby.Philp@planning.nsw.gov.au>
Date: 1/03/2013 1:51 PM
Subject: Landscape and Visual Impact Assessment
CC: [REDACTED]

We wish to respond to your Landscape and Visual Impact assessment Report for Yass Valley Wind Farms Pty Ltd.

The statement that Wind Farms have overall community support does not agree with the CSIRO publication **Exploring community acceptance of rural wind farms in Australia: a snapshot by Nina Hall, Peta Ashworth and Hylton Shaw CSIRO Science into Society Group • 2012** which states “The media analysis of 49 articles from 19 newspapers in the second half of 2010 found more reasons for wind farm opposition were reported than reasons for support. The most cited reasons for rejecting wind farms were landscape change and visual amenity impacts, noise impacts, and poor consultation.”

Our concern that your assessment does not appear to recognise the widespread visual impact from 148 massive towers, 150 metres high, over productive farming land and you appear more concerned with the impact the [Yass Valley Wind farm will have on tourism and traveller amenity](#).

We also disagree with the statement that the “likely cumulative visual impact is probably low for residential dwellings where towers will have a dominant effect on the landscape”. Everyone but the host farmers are horrified at your insensitive and arrogant assessment. Other aspects including noise, effect on native fauna, health concerns and lowering of land values are of equal importance and must also be considered. A great many people in any population these days have compromised immune systems for various reasons, and they especially are very likely to be afflicted with health problems, apart from others who also become vulnerable to the insidious effects of the wind farms. A major concern that has recently manifested itself in the local community is the ban imposed on aircraft operating within one kilometer of towers. The Yass Valley and Harden Shires have lost over 17,000 ha and tens of thousands head of livestock to January 2013 fires. Aircraft, both fixed wing and helicopters, were of major assistance in controlling these fires in conjunction with crews on the ground. As the topography of much of the area selected for turbines is difficult for ground crews to reach, the need for aircraft assistance is paramount. I would like to quote one fire captain who said he would not send in crews without aerial support. The effects of these fire fighting restrictions are devastating and have not been considered in your assessment.

Your assessment of the cumulative visual impact of the Yass Valley Wind Farm has concluded that there would be minimal cumulative visual impact and that the changes to peoples’ perception of the surrounding area would not be significantly changed by the presence of multiple wind farms in the locality. A number of public meetings have indicated otherwise and the effect on the occupants of over 200 dwellings in the viewpoint area is substantial and we can only support a further detailed assessment where all the community becomes involved.

[REDACTED]
[REDACTED]
Bowling NSW 2582