

Liverpool Range Wind Farm

Thank you for the opportunity to comment on “Modification 1” for the Liverpool Range wind farm. (LRwf)

It was always the intent for Tilt Renewables (Tilt) to include a BESS in this “modification”, but somewhere along the line they decided to submit the BESS as a future separate “modification”. Why, you may ask?

My guess is that even the Department concluded that they would have to class the Application as a new wind farm if the BESS was included. One day we will find out.

Even without the BESS in this application the case is strong that this project should be classed as a **new wind farm**. The BESS decision, for which the scoping report may well be in preparation, only reinforces that.

Some of the reasons that further highlight the classification of this project as a new wind farm include:

1. The turbines bear no resemblance to those approved.
The diagram in the “Modification” Report (“M”R), Page 134, shows the comparison (underestimated) to the currently approved turbines is stark. The key change visually, is that of swept area. There are a number of different blade lengths in the “modification” documentation for both the approved variant and the proposed wind farm. If you take the Tilt figures on page 51 of the “M”R, you get a swept area increase of 161%. If you take the blade diameter for the approved wind farm from page 134 of the “M”R, the increase in swept area is 264%, no doubt the largest such increase in a NSW wind farm “Modification” by far.
(How can you assert that the VI comparison between these two wind farms does not change for non-associated residences and that no VI is greater than medium?)
2. The turbine layout is very different to the one approved. The only commonality is determined by the terrain.
The standard distance for micro-siting is 100 metres. The LRwf Consent Conditions state:
“The Applicant may micro-site the wind turbines and ancillary infrastructure without further approval provided:
(a) they remain within the development corridor shown on the figures in Appendix 2;
(b) no wind turbine is moved more than 100 metres from the relevant GPS coordinates shown in Appendix 2;”
The “M” R tells us that of the 220 turbines, 132 have been moved greater than 100 metres. Of these, 21 have been moved more than 1000 metres. Of these 3 have been moved more than 4000 metres.
That’s not micro-siting.
On Page 8 of the “M”R, Tilt advises that one of the turbine changes requested is:
“Updating the locations of a number of the turbines to accommodate the revised turbine spacing required for the larger turbines”
According to the table in Appendix C.3, **every one of the 220 turbines has been moved from its approved position** and the other 47 have been moved out of the project. Clearly Tilt has designed a new wind farm.

3. Tilt asks for a micro-siting distance of 250 metres, as opposed to the current 100 Metres, unique amongst NSW wind farms. They've had nearly four years to design the turbine layout for this new wind farm and this request tells you that they aren't anywhere near there yet.
(the cynic in me suggests that this request was only proposed to that it could be rejected [or dropped to say 150 metres] as part of an approval just as all proponents drop a few turbines in exchange for taller turbines)
4. Clearance of protected vegetation.
There is a suggestion or two that Epuron underestimated the extent of clearing (unsurprising) in the original EIS/RTS but that is irrelevant. Tilt lives with what is approved. The "modified" project is estimated to result in the following impacts to NSW and Commonwealth Box Gum Woodland:
 - removal of approximately 427.0 ha of NSW Box Gum Woodland. This equates to approximately 2.2 x times the impact threshold of 200.85 ha specified in Condition 18(a) of the existing Development Consent.
5. The Commonwealth treats it as a new wind farm as the proposal has to be re-referred to the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) for reassessment and approval as required under the EPBC Act.
6. Another noteworthy difference is the fact that the LRwf is now in a REZ. It wasn't initially (nor was the constructed and operating Crudine Ridge wind farm). Surely EnergyCo needs more information to decide whether an extra 358 MW of capacity to 1320 MW suits the relatively modest Central-West Orana REZ objectives and the planned network changes. For that matter, can they cater for the existing approved LRwf?

Would EnergyCo welcome the inclusion of a BESS?

7. Every significant assessment criteria seems to be supported by a new study from an expert. What is more, most (all?) of these studies have been done by a different consultancy.
For example:
The VI study was originally done by Green Bean Design but in the "modified" wind farm it was done by Moir.
The Sound study was originally done by SLR but in the "modified" wind farm it was done by SONUS.
The Flora and fauna studies were done by NGH Environmental and Umwelt respectively.
Traffic and Transport by Epuron/Zen Energy and GTA Consultants
And so on.
It's as if Tilt is proposing a new wind farm.

In effect, virtually everything has changed either factually, in quantity, size, design and/or location. Additional to those examples above we can include:

- Proponents (Epuron to Tilt). Forget the nonsense that the proponent is "Liverpool Range Wind Farm Pty Ltd"
- Hosts
- Non-associated surrounding landowners
- On-site collector substations

- Access tracks
 - O&M facilities
 - Overhead power lines within the farm
 - External transmission line and connection infrastructure
 - Underground cabling
 - Temporary infrastructure
 - Meteorological Masts
 - Site Access points
 - Transport route
 - Public road upgrades
 - Noise
 - EMI
 - Aboriginal and post-contact Heritage
 - Shadow flicker
 - Aviation safety
 - Laws, Regulations and procedures
 - Development corridor and Indicative Development Footprint
- etc

Note the qualifier “indicative”

Not only is this a proposal for a new wind farm it is a long way from certainty. In the “Modification” Report alone, there are 273 instances of this word.

Also note that all Public and Agency submissions for the approved wind farm with an attachment are missing that attachment. I guess you wouldn’t expect to find previous submissions supporting a new wind farm.

The proponent makes a feeble attempt to claim that the two wind-farms are substantially the same development by arguing that:

“A comparative assessment of the Approved Project and Modified Project against all relevant considerations has been undertaken to assess whether the Modified Project is ‘substantially the same development’ as the Approved Project having regard to the key principles from relevant case law (see Table 7).”

But unfortunately cites no cases.

Clearly this proposal needs the certainty that can only be provided by the new wind farm process, from relevant SEARs right through to IPC oversight and the potential for a Land and Environment Court review.

I object

Anthony Gardner