

17 October 2022

Director – Energy Assessments
Department of Planning and Environment
Locked Bag 5022
Parramatta, NSW, 2124

Dear Sir/Madam,

Objection to proposed modifications to the Liverpool Range Wind Farm – Mod-1– SSD – 6696 – Mod-1

This is an objection to the proposed modifications for the Liverpool Range Wind Farm project (“Project”) following my review of the published Modification Assessment Report (“Report”) dated September 2022 as submitted by Tilt Renewables.

The Report requests modifications to development consent SSD 6696 granted for the Liverpool Range Wind Farm on 27th March 2018. These modifications include materially increasing the overall size and blade area of each proposed turbine, including:

- Increasing blade tip height of the turbines by 85 metres from 180 metres to 250 metres
- Increasing the nominal hub height by 50 metres from 110 metres to 160 metres
- Increasing each blade length by 45 metres from 55 metres to 90 metres.

These are massive changes to the previously approved development consent and while the total number of turbines is being reduced from 267 to 220 turbines, I understand over half (60% or 132) of the turbines are proposed to be moved and relocated. The massive scale of these modifications are more akin to a new project. The consequential material and negative implications for the proposed material modifications (see further reference below) require DPE to reject the application by Tilt Renewables and request a new Environmental Impact Statement (“EIS”) to be submitted for further review.

A new EIS is required to fully understand the massive implications the proposed modifications have to surrounding landowners, the Coolah district and particularly for the landowners such as myself which are now implicated by the cumulative effect with the proposed Valley Of The Winds wind farm.

As set out in the Report, I estimate I will now see in excess of 100 of the modified Project turbines from my property and in my north-east aspect, compared to less than 20 under the existing consented project. I have never been approached by Tilt to make me aware of the proposed changes and their impact to my property. Since many more turbines will now be more evident in my field of view from my property, this materially negatively impacts amenity value to myself and to the Coolah district. The visual impact to my neighbours is more acute, as it also is to the many residents in Coolah who are now only realising the modified turbine configuration and height will dominate the surrounding skyline. Coolah sits in a very scenic valley and does not want the surrounding ridgelines littered with 250 metre wind turbines towering over the township.

The Report does not adequately address the following negative implications of the modifications:

Visual impact assessment

- The original Liverpool Range Wind Farm visual impact assessment was not prepared in accordance with the DPE Visual Assessment Bulletin, as the bulletin was not finalised nor formally adopted by the NSW Government prior to issuance of the visual impact assessment in March 2014. So using this original assessment as a baseline to consider the proposed modifications is fundamentally flawed.
- Additionally, using the same methodology as the original visual impact assessment to consider the modifications is flawed. Since 2014, visual impact techniques and analysis has advanced considerably, together with the height of turbines, all with increased community discontent. Assessing now the “level of acceptable change” (see page 8 of Moir Report, dated July 2022 Rev 1) from a now outdated baseline using outdated assessment techniques is simply disingenuous to non-associated landowners and the Coolah community.
- The DPE Visual Assessment Bulletin of December 2016, which is referred to in the Report is outdated. This bulletin does not consider 250 metre tip height turbines and it has not been updated. As such, references to “blue line” (4,950 metre distances) and “black line” (3,350 metre distances) to determine assessment of 250 metre tip height turbines is flawed. The visual assessment bulletin needs to be fully updated before it can be applied as the assessment framework for 250 metre tip height turbines.
- The DPE Visual Assessment Bulletin states that only approved and operating wind farm projects should be considered to assess cumulative visual impact. This assumption is also flawed and all announced potential projects, whether they are approved or not, should be considered to determine cumulative visual impact assessment.
- Photomontages should be conducted for any property of any non-associated landowner, to allow them to fully assess the impact the visual disturbance to their overall property created by any wind farm project (and not just assess visual impact at the dwelling).
- Dwelling assessment has only been done to dwellings included in the prior Visual Impact Assessment (which were identified as impacted from the smaller turbine and prior configuration) or within the “black line”. Dwelling assessment has not been conducted for landowners now impacted by the increased turbine tip heights within the blue line perimeter or beyond as may be necessary.
- Photomontages should also be shown with blue-sky background, thereby depicting the greatest impact to field-of-view.

Noise impact assessment

- The Noise Impact Assessment previously prepared by SLR Consulting for the Liverpool Range Wind Farm project (March 2014) applied a zero ground factor in its noise assessment models. It is not clear from the Predictive Noise Impact Assessment by Sonus in the Report which noise predictive model assumptions have been utilised. It is not evident the Noise Impact Assessment report prepared by Sonus for the modifications has assumed a “zero ground factor”. As set out in the South Australian EPA guideline, which the NSW Government has adopted (specifically “Wind Farms environmental noise guidelines (SA 2009)), the noise assessment models should be assuming a zero ground factor. It should therefore be confirmed whether Sonus did apply a zero ground factor, or if not, for the noise assessment report to be redone as part of a complete EIS being submitted for review.
- It is not clear whether Sonus has considered the effect of wind turbine noise propagation over valleys nor where it has been applied. The Sonus report needs to be revised to include

corrections for the propagation of noise over valleys into its assessment and showing which non-associated properties are impacted by these overall adjustments.

Biodiversity impacts

- The proposed modifications have a material negative biodiversity impact since they result in an increase in the extent of ground disturbance which has a flow on negative impact to associated native vegetation and habitat. The Box Gum Woodland Critically Endangered Ecological Community (CEEC) as listed under the BC Act (NSW Box Gum Woodland) and EPBC Act is particularly negatively impacted.
- The proposed modifications would require the removal of 427 hectares of NSW Box Gum Woodland – which is 2.2 times the impact threshold of the prior approved project. A further 42.1 hectares of Commonwealth Box Gum Woodland, which is 3 times greater than the prior approved project. These areas have previously been updated to critically endangered.
- The proposed modifications also negatively impact potentially suitable habitat for the following threatened species
 - o Regent honeyeater
 - o Swift parrot
 - o Large-eared pied bat
 - o Koala
- The overall biodiversity impacts of the modified project are too excessive and further studies should be undertaken to reduce the size of the project to find a more suitable balance against biodiversity impacts

Other impacts

- Other impacts caused by the modifications which I object to include:
 - o Location changes suggested by EnergyCo to the proposed transmission line easements. These changes significantly impact non-associated landowners
 - o The increased size of the internal transmission lines – these are of a scale now that are too large for local community acceptance
 - o Water usage that has increased by a factor of 10 – further support for a new EIS to be prepared and submitted rather than trying to fast-track through the planning process a modification.
 - o The negative impact to property prices caused by being located next or adjacent to wind farm developments. Landowners seek to maximise property values and do so with the expectation they will not have massive industrial infrastructure projects built nearby. The proposed project will create reduced amount of interest and competition for acquiring land in our district, thereby reducing price competitiveness and land value – without any compensation.

Given the short period to review fully the Report, I reserve my right to make additional submissions after further consideration and after the proponent undertakes further technical and project reviews to address the issues raised.

I am available to answer any queries raised in this submission.

Yours sincerely,

M. E. Baillieu
Tongy Station, Cassilis