



Woodlawn Wind Pty Ltd · ACN 139 165 610  
Level 22 · 56 Pitt Street · Sydney NSW 2000 ·  
Australia  
T +61 2 8031 9900 · F +61 2 9247 6086 ·

9 March 2010

**Ms Swati Sharma**  
Environmental Planning Officer  
Infrastructure Projects  
Department of Planning  
23-33 Bridge Street, Sydney NSW 2000

Dear Swati,

We are writing in response to the submissions made regarding our application to modify the development consent for Woodlawn Wind Farm. There were ten submissions received, six of which were from private parties and four from NSW Government agencies. Of the private submissions, one was generally supportive, though did raise queries regarding visual amenity, whilst the remaining four raised objections. The NSW Government submissions were generally supportive, though some specific queries were raised. In responding to the private submissions, we have listed the issues raised and our response to that issue. We have separately addressed the issues raised in the NSW Government submissions.

## 1. Private Submissions

### Submission 1

**Visual Amenity.** The submission notes that the existing Capital Wind Farm looks 'quite spectacular' from the Federal Highway. However, when approaching the wind farm from the south, they feel the view is far less appealing. They also note this is a very subjective field and request that some relocation of the now reduced number of turbines might improve the aesthetics. In reality, the layout of the wind farm is driven by several factors, mainly prevailing winds, topography, neighbouring residences, and other environmental constraints. In the case of Woodlawn, the wind farm is to be built on a north – south running ridge, which happens to be at a near right angle to the prevailing north westerly winds. Given the topography of this ridgeline, there is very little scope to move turbines to the east or west of their proposed locations. It should be noted that the north south configuration will be very difficult to see from the south (Kings Highway) due to distance and topography. It will be visible from the east on parts of Tarago Road, however this will be a side on view, which appears to be the view that the respondent prefers.

### Submission 2

**Consultation.** The respondent claims no consultation has occurred. It is noted that the respondent lives over seven kilometers from the nearest turbine. Extensive consultation was undertaken during the original EIS process and all residents living within three kilometers of a turbine were directly consulted in regards to this proposed amendment. Woodlawn Wind Pty Ltd does not own the website to which the submission refers and has no control over what a third party may or may not do with their own property. Woodlawn Wind has acquired a domain name ([www.woodlawnwind.com.au](http://www.woodlawnwind.com.au)) and will establish this as the project website in accordance with the conditions of consent, i.e. pre construction.

**Noise.** Wind farms are not regulated under the POEO Act. Once operational, the wind farm will comply with the South Australian wind farm noise guidelines, as interpreted and detailed by the NSW Department of



Planning (DoP) in the Conditions of Consent. Construction noise is also regulated by the conditions stipulated in the development consent. Operational noise monitoring will be coordinated by the proponent, in accordance with the conditions of consent. It is not appropriate for the proponent to be supplying acoustic monitoring hardware and training to the DoP. The DoP has its own acoustic resources and skill base.

It is nonsensical that wind turbines should not be permitted to operate 24 hours / day during the 'commissioning phase' referred to in the submission, whilst they are able to operate 24 hours / day post commissioning. The key requirement is that the wind farm complies with the operational noise limits.

The background noise levels were identified in the original assessment. The respondent's house was not included in this study as the house is over seven kilometers from the nearest turbine and therefore the Woodlawn Wind Farm turbines will have no adverse noise impact on that residence.

**Visual.** The submission requests inclusion in an off-site landscaping requirement. The residence is over seven kilometers from the turbines and will not be able to see them. The nearest infrastructure from Woodlawn Wind Farm is a 33kV overhead line, located 2000m to the west, at its nearest point. The line will also not be readily visible from the house at this point and would be very difficult to discern at any other location. An underground cable from the wind farm to the substation would very seriously impact on the economic viability of the project.

**Traffic.** As occurred with Capital Wind Farm, the proponent intends to use rock anchor foundations. Further, there are now five less turbines to be installed. As such and contrary to the assertion in the submission, there is a dramatic reduction in concrete truck movements from a forecast 2200 to 400. Road dilapidation reports are undertaken to the extent required by the conditions of consent, the relevant council and the RTA.

**Audit.** The Environmental Representative is an independent party approved by the Minister for Planning. The submission states that in the respondent's opinion, the Environmental Representative should have no role in preparation of the DA, construction or operation. We do not see how the ER would have any role in construction or operation, beyond meeting his clearly stated responsibilities. We would not propose an ER that was an employee of the proponent. Should the ER have been involved in preparation of the DA, we feel this only makes the ER more effective in their role, as they have detailed knowledge of the project from the outset.

#### Submission 4

**Construction Hours.** The submission opposes extended work hours to enable erection of turbines. The respondent is between seven and thirteen kilometers from the turbines. Turbine erection is a relatively low impact process, that requires specific weather conditions. High winds, which obviously are common in the area, will force turbine erection to cease. This will generally occur more often during normal working hours. Each time excessive winds occur, erection must cease and work completed to that point will often need to be repeated once the wind abates. As a result, the constrained erection times significantly extend the length of construction and the general volume of noise created by construction (due to the need to repeat tasks). It is noted that there are only three houses within three kilometers of a turbine and all are over 2.7km away. By extending the work hours for turbine erection only, the construction phase may be compressed (by an estimated two months) and overall construction noise impact will be reduced. At a distance of 7-13km, the respondent is too far from the wind farm to be effected adversely by turbine erection noise.

Woodlawn Wind Pty Ltd is owned by Infigen Energy Ltd, the parent company of Renewable Power Ventures Pty Ltd. Infigen Energy disagrees with claims made by the respondent of injuries resulting from noise.

**Noise.** The submission states that the noise impact assessment at CWF has been 'proven totally incorrect'. No such evidence exists and the wind farm complies with its operational noise restrictions. Woodlawn Wind stands by the noise impact assessment prepared for Woodlawn Wind Farm.

**Flora.** The submission states there is a contradiction between the CWF and Woodlawn flora and fauna surveys. Woodlawn Wind believes that no such contradiction exists. The road to the substation where it passes through the yellow box is not pertinent to this DA modification. However, for the record, Infigen Energy complied carefully with its stated restrictions when improving that road.



**Traffic.** The respondent claims a near miss occurred on a public road with a heavy vehicle associated with Capital Wind Farm. No evidence of this claim exists. A Traffic Management Plan will be prepared prior to construction commencing. The Traffic Management Plan will include measures to ensure safe travel to and from the wind farm by construction related vehicles.

**Transmission Line.** The respondent questions why they must be inconvenienced by a new overhead line being built. They suggest the wind farm should connect via a new substation at Woodlawn. The respondent's house is on the other side of a hill, 2200m from the line at the nearest point. Any inconvenience during construction will be managed to a minimum and mitigated by restrictions on construction hours. Power line erection is a low impact activity, using a limited number of light to medium size vehicles. A 66kV line does run through Woodlawn, however, the capacity for any new generation is very limited on this part of the network. The already constructed Woodlawn bioreactor will take up the bulk of the spare capacity. It is not technically feasible to install a 42 MW wind farm on this line.

Importantly, the line is not visible from the respondent's house and would be very difficult to discern at other locations. An underground cable from the wind farm to the substation would very seriously impact on the economic viability of the project.

**Consultation.** The respondent claims no consultation has occurred. It is noted that the respondent lives between seven and thirteen kilometers from the turbines. Extensive consultation was undertaken during the original EIS process and all residents living within three kilometers of a turbine were directly consulted in regards to this proposed amendment.

#### Submission 6

**Noise.** The respondent enquired whether operational sound monitoring will still be required at his house. Subject to his consent, Woodlawn Wind will undertake operational noise monitoring at the house.

**Landscaping.** The house is 2.7km from the wind farm and the proponent will invite the owner to participate in the offsite landscaping plan.

#### Submission 8

**Consultation.** All residents within three kilometers of the wind turbines were consulted regarding this modification. The respondent is four km from the nearest turbine, a situation which is unchanged from the original approval.

**Visual.** This residence will be included in the offsite landscaping plan. The respondent refers to the Capital Wind Farm landscape plan, for which an effective tree planting plan has been proposed to augment the substantial number of trees already in the vicinity of the house.

**Noise.** A complaints phone line and email address will be established. The residents may lodge any complaints on that phone no. or email. Alternatively they are free to lodge complaints directly with the DoP. The wind farm will subject to established noise compliance testing procedures. The wind farm will comply with the conditions of approval for noise emissions.

**Communications Interference.** This residence has already been upgraded to digital tv reception. Their TV coverage is superior to that previously available to them. It is noted that as analog is currently being phased out, the residents would have had to take this action anyway, though at their cost. A baseline for TV reception was established prior to construction of CWF. Complaints may be forwarded to the email or complaints phone number that will be established. Woodlawn cannot make any statement about what local TV stations choose to broadcast, i.e. whether they will continue to broadcast local news. In terms of reception, the EIS refers to several steps available to the developer to remove any negative impact on reception that the turbines may have. This has been successfully carried out at CWF.

The wind farm does not impact on mobile phone coverage.

**Construction Traffic.** As per construction traffic at CWF, measures will be taken to minimize any interaction between the school bus and heavy construction traffic.



**Construction Noise.** Woodlawn Wind has sought consent to erect turbines out of hours for reasons stated previously in this report. In regards to lighting, the work area around the turbine being erected will need to be lit. This will consist of illumination on the ground and upwards to illuminate the overhead operations. Considering that in the absolute worst case (where all 20 turbines were erected at night) local residents (most of which are several kilometers away) may only see these lights for some hours over 20 nights, we feel this will create a relatively low level of inconvenience. In practice, it is very unlikely that every WTG will be erected at night.

**Gravel Pit.** This gravel pit is not visible from the respondent's property and is approximately 5 kilometers away. Its use will be subject to the normal constraints and procedures covered by the construction environmental management plan.

**Road Width.** The expansion to 10m wide roads is a temporary requirement for construction. The road width will be reduced post construction. Normal erosion control procedures will be implemented in accordance with the construction environmental management plan. Due to the topography, views of any wind farm roads will be very limited and very distant from this house.

#### Submission 9

**Land Use.** The primary issue in this submission relates to the perceived impact of the wind farm should the respondent's property be rezoned in the future to permit subdivision into smaller rural residential blocks and residences are subsequently built on those blocks. The land is zoned Rural 1A and there are no plans for this situation to change at any time in the foreseeable future. The wind farm has been previously considered and approved based on the zoning that currently exists. The current modification will also be considered based on the current zoning of the region.

The Sydney-Canberra Corridor Regional Strategy refers specifically to rural residential development in the Goulburn-Mulwaree LGA:

"Existing rural residential zones have the capacity to meet the demands for rural lifestyle housing within the LGA. Additional development areas will only be considered if justified by a Local Settlement Strategy that assesses the loss of valuable agricultural lands. (NSW Department of Planning Sydney – Canberra Corridor Regional Strategy Fact Sheet July 2008)"

No such Local Settlement Strategy has been prepared for any land in the broad vicinity of the wind farm. The landowner may apply for re-zoning, however it is Council, in compliance with the Sydney-Canberra Corridor Regional Strategy, that will make these decisions. Given the Strategy covers the next 25 years of development in the Goulburn-Mulwaree LGA, it is expected that an application for rezoning the land the subject of this submission will be rejected.

It is also noted that the Strategy states:

- "Suitable locally generated and / or renewable energy projects such as wind, solar and bio waste will be supported.
- Subject to adequate resolution of environmental impacts, opportunities for development of wind powered electricity generation will be monitored by restricting incompatible land uses (e.g. residential) in high quality wind resource areas."

The Woodlawn Wind Farm site has one of the best wind resources in NSW.

**Layout.** The submission makes the false claim that despite the overall number of turbines being reduced from 25 to 20, the removed turbines all come from the northern end. In fact, of the fourteen most southern turbines originally approved on the Pylara property, only ten remain under this modification, i.e. almost all the removed turbines are from the southern end.

**Noise.** The noise impact assessment has been undertaken based on the current location of housing. The proponent stands by the results of the noise impact assessment. It is not appropriate for the proponent to undertake a noise impact assessment to account for the theoretical possibility of future housing that would in any event breach the current zoning and development strategy for the region.



**Infrasound.** Whilst infrasound is generated by machines, weather (wind, lightning, etc...) flora and fauna, etc..., there is no scientific evidence that the extremely low levels of infrasound generated by wind turbines causes any ill effects in humans.

**Visual.** The submission refers again to the perceived negative impact of the aesthetics of the turbines on future residences located on yet to be sub-divided land. As previously discussed, such a re-zoning would be contrary to the Sydney-Canberra Corridor Regional Strategy.

**EMF.** The submission raises concerns regarding EMF from the proposed 33kV overhead line. This line is approximately three kilometers from the Glendale residence. The residence is connected to the local grid and will receive vastly higher levels of EMF radiation from this 11kV line (albeit still very negligible), than the proposed 33kV line.

**Shadow Flicker.** The Glendale residence will not be impacted by shadow flicker.

## **2. NSW Government Departments**

### **Submission 3 – Roads and Traffic Authority**

**Transport.** The requirement to acquire an RTA permit for an oversized and over mass load is noted.

### **Submission 5 – Department of Environment Climate Change and Water**

Submission noted.

### **Submission 7 – DII**

**Consultation with Tri-Origin Minerals.** The respondent enquires whether consultation has been undertaken with TriOrigin Minerals regarding future mineral exploration. Woodlawn Wind can confirm that TriOrigin Minerals has been extensively consulted on the proposed modification and is a party to a written agreement with Woodlawn Wind and the landowner which clearly outlines TriOrigin Minerals ongoing exploration rights.

### **Submission 10 – Sydney Catchment Authority**

The proponent confirms that the access road from Collector Road will not be wider than 10m, though it is noted the current track may be wider than 10m in some limited locations. The proponent is agreeable to the proposed changes to Conditions of Consent No. 30 (d) and 73 (c).

Yours sincerely,

A handwritten signature in black ink, appearing to read "David Griffin", written over a series of horizontal lines.

**David Griffin**  
For Woodlawn Wind Pty Ltd

