

I live in Mount Fairy, so Capital 1 and 2 are my current local wind farms. Firstly let me comment on the 3 page proposal signed by Mr David Griffin.

In particular, from page 2:

“The proponent has **reviewed what are the potential impacts** associated with the proposed modification and **reviewed those impacts in conjunction with environmental consultants**. The findings are summarized below with **supporting documentation attached**.” (my bold)

- How did the proponent arrive at the subset of “potential impacts”?
- Who was the environmental consultant who reviewed the impacts on visual amenity?
- Where is the supporting documentation from the chosen consultant regarding the findings on visual amenity?

Then in the section on Visual Amenity.

“(the) visual impact will be reduced as a result of the proposed modification”  
and

“any increase to the blade length at the expense of tower height will reduce the impact on visual amenity”

It certainly wouldn’t in my case. I have a view from the residence of the whole swept area of some of the Capital 1 turbines. If the swept area of those turbines was increased by over 22%, it most certainly would negatively impact the visual amenity from my perspective.

- Which consultant provided the above statements?
- What studies have compared the relative impacts on visual amenity for the stationary tower and the rotating blades?

Flora and Fauna

Surely there is more to it than a statement that birds fly close to the ground. Surely there must, by definition, be a greater impact when the swept area goes up by over 22%.

- What about the raptors?
- Does the power increase have any effect?
- Is there any change in bird activity depending on the water levels in Lake George? I note that there have been significant changes in water level since the last KMA study period (May 2010)
- Why did the department limit the study to avifauna? Bats?
- Why is there “very little blade strike” on the Capital wind farm?
- As the Capital 2 turbines on the shore of Lake George are at an elevation of 680 metres compared to the existing Capital 1 turbines on the ridges (up to 935 metres), surely it is an entirely different environment for “avifauna”?
- the Department requested that “A flora and fauna assessment should be undertaken...”  
Where is it?

Noise

“Sonus.....includes examples that clearly show there is no direct correlation between increased blade length and increased noise levels.”

Maybe Sonus needs to talk to Seimens, who clearly believe that, all things being equal,

there is a direct correlation between noise and blade length and between noise and power generated.<sup>1</sup>

Does the department have confidence in Sonus' ability to comment professionally on the modification when they did not do the original sound study and don't mention it. Also, to me, it appears that in the last paragraph of their letter, they walk away from any advice without the noise assessment being redone.

### Transport

This was for Infigen's benefit, not anyone else's. They had to do it. If they couldn't get blades of that length to the site in a cost effective manner, then there would be no submission.

### Departmental action required.

I appreciate that the original approval (01/11/11) was made under the then rules and guidelines. However, the Planning Assessment Commission in rejecting the Gullen Range modification said on October 2, 2014:

"Although this is a modification application to an already approved wind farm, the Commission considers it should have regard to the intent and spirit of the draft guidelines in determining this application."

This approval should be made under today's guidelines. ie the NSW Wind Farm Guidelines (draft)

- Infigen must be advised to form a Community Consultative Committee immediately.
- Conditions of approval for the whole Capital 2 project must be modified as if the whole project was being approved today, especially in the areas of visual amenity and noise.

### Community Funding

Infigen is very guarded when it comes to community funding. It has some high profile local sponsorships and keeps the local editors happy with the occasional purchase of a full page. There is also some promise into the future for an unknown one-off payment per turbine built.

We must therefore take the Infigen Annual Reports as the guide for community funding. The 2012/13 annual report<sup>2</sup> trumpets on Page 38 that \$333,000 was the total for the company (Australia and the US) of all sponsorships. By any measure, per turbine, per annum or per megawatt per annum, this is a pittance compared to other wind farm developments.

---

<sup>1</sup>[EWEA\\_WindDirections\\_Feb\\_2013-NoiseWorkshop](#)

Stefan Oerlemans, an engineer at Siemens, speaking at an *EWEA technology workshop on noise* held in *Oxford*

<sup>2</sup> <http://www.infigenenergy.com/investors/publications/annual-reports.html>

Then, in the 2013/14 annual report on Page 34, we find that has dropped to \$262,000, for the last financial year. Appalling.

Here we have an application from Infigen that will increase the power output by at least 22% and no doubt more as these blades may be able to produce power at lower wind speeds. That's on top of modification one which increases the power per turbine but also not the contributions. There will be no benefit to the local community, not one extra job or dollar.

The Department must use whatever influence it has to insist that Infigen provide community funding for Capital 2 in line with current practice. I would suggest \$2500 per turbine per annum (\$102,500) as per Boco Rock etc.

**Other potential issues not covered.**

Where is the assessment of the changes on "the impact of shadow "flicker", blade glint....." (key issues in any current DGRs). In the years since original approval, blade technology has changed considerably. With the new materials, surfaces etc, coupled with the 22% increase in swept area, surely this topic is worthy of review.

Also, the current DGRs for the Jupiter Wind Farm require the developer to "identify threatened species, populations and communities.....and the 23 migratory bird species that are identified in the DGR Request including those associated with nearby waterbodies such as .....Lake George." The Jupiter turbines are planned to be something like 20 kms from Lake George. Capital 2 will be on the shores.

In the words of a current Department planner in relation to another EIS:

"The Final EA (as on exhibition) was accepted by the Department for public exhibition purposes as it was considered the information contained within that document was adequate for public review".

How did the Department arrive at the conclusion that this EIS was adequate for public review?

I recommend that the application be rejected in its current form. Should the Department disagree, as the proposal was originally approved by the PAC, then this modification should also require PAC approval.

Anthony Gardner  
Mount Fairy