

Boco Rock Wind Farm Modification 1.

Application No. SSD 090103 MOD 1

I object to the above Modification on the following grounds and no further wind turbines should be erected on the site for the following reasons:

1. Project Approval Lapse

In the Administrative Conditions to the Project Approval dated 9 August 2010 the following conditions appear:

“1.5 This approval shall lapse five years after the date on which it is granted unless works the subject of this approval have physically commenced on site..... For the purposes of this condition works means all construction, operation and decommissioning activities associated with the project including those activities which are excluded from the definition of construction in Schedule 2.

1.6 The Proponent may elect to construct or operate the project in discrete work packages or stages. In this case, these conditions of approval may be complied with separately for each discrete work package or stage, as relevant. “

It appears that the Proponent Boco Rock Wind Farm Pty. Ltd. has completed Stage 1 of the project and now the applicant about 8 years after the project approval wishes to proceed with Stage 2, subject to modifying the size of turbines and having fewer turbines.

The question arises whether under conditions 1.5 and 1.6 the Stage 2 works have commenced, or if not, can now commence. Condition 1.6 does not state that any stage can commence later than 5 years after the date of the grant of approval. In my submission, the proper interpretation of these conditions is that the project may proceed in stages, but any stage must commence no later than 9 August 2015 failing which the approval lapses. The applicant says that “ Stage One of the Project commenced construction in 2013 and became operational in 2015, consisting of 67 WTGs. The remaining 55 approved WTGs in the Boco and Yandra clusters are yet to be constructed.” It would appear that the Stage 2 works have not commenced and that the approval has lapsed. In my submission the applicant can proceed with the works in Stage 2 only if those works commenced before 9 August 2015. If the application proceeds, it should be amended to set out how it is claimed (if it be claimed) that the original approval has not lapsed and remains in force. Further, the project approval was granted to Boco Rock Wind Farm Pty Ltd not the applicant Boco Rock Stage Two Pty Ltd and if the two companies are not the same legal entity, perhaps by change of name, a question arises as to how the applicant Boco Rock Stage Two Pty Ltd claims to be entitled to exercise the rights granted to Boco Rock Wind Farm Pty Ltd. In my submission, the application if it proceeds should be amended to explain the entitlement of the applicant and all objectors notified of all amendments, with an opportunity to comment on all amendments.

2. State of NSW Electricity Supply

When the development consent was granted over 8 years ago, one of the reasons given for the approval was that the NSW electricity supply would be improved by more wind turbine energy. In

2018, the principal problem in the electricity grid as acknowledged by the Commonwealth Government is that there is insufficient continuous electricity supply as opposed to intermittent supply from wind and solar sources. This demonstrates how unsatisfactory it is that after 8 years delay the applicant should seek to proceed further with the development. It is not in the public interest that projects be delayed for indefinite periods of time. The current state of the NSW electricity supply does not require further intermittent wind power and further turbines should not be erected at the site.

3. Landscape Impact of Proposed Turbines 200 metres high

The NSW State Government Wind Energy: Visual Assessment Bulletin December 2016 (DPE Guidelines) appears to suggest that wind turbines in rural farming areas are more likely to be approved than in urban areas, National Parks, coastal zones and other areas called Sensitive Land Use Designation. This implies both that wind turbines damage the landscape and that in rural areas neither the landscape nor its residents matter. The suggestion that wind turbines be screened by plantings is further proof that wind farms are unwelcome destroyers of landscape, yet they continue to be approved on the basis that only one sector of the community must bear the pain. Industrial solar power installations, which do not intrude on the skyline and which may more readily be screened by plantings, would be more acceptable in supplying renewable energy and could be accommodated so as to share the burden of renewable energy generation more widely throughout NSW.

The proposed new turbines are 200 metres high which is about twice the height of the tallest building in Canberra City and the height of some of the tallest buildings in Sydney. To suggest that these turbines will have little environmental impact in the landscape of the Monaro is clearly wrong. In my opinion, the principal asset of the district and its residents is the pristine landscape and this asset is now being eroded by inappropriate development. Following the merger of the three local councils to form the Snowy Monaro Regional council, I attended meetings of residents at Bombala to discuss the assets of the district and the vision for its future. The pristine landscape was identified by many as a valued and important asset, which has been recognised also by the new council. In this respect I refer you to the Snowy Monaro 2040 Community Strategic Plan. Any industrial structures including wind turbines do violence to the landscape and destroy the principal asset of the district and its residents. One long term local farmer has said to me that this project has already turned the site into an industrial wasteland. To my knowledge, there is no guarantee by a bank or the NSW Government that the structures will ever be removed.

The existing wind turbines can be clearly seen from the Monaro Highway, the Snowy Mountains Highway, for a distance of about 55 kilometres to the south and from extensive other areas of the Monaro. I am aware that some farmers are saddened that their views of the district from their properties now include industrial structures. The extent of the dominance of the turbines in the district was not recognised before they were built and is still not recognised by the applicant. If new 200 metre towers are built, the extent of the damage to the landscape will be even greater and even more unacceptable. Long distance views in an open rural area such as the Monaro are important to residents.

Planners should recognise that industrial structures in urban areas cause less damage to landscape, where it mostly comprises built form, than in rural areas where there are almost no structures at all.

The application is concerned primarily with views close to the development. Proposed plantings to screen out 200 metre high towers in an area in which plants take many years to grow, if they grow at all, are fanciful. No studies or evidence at all is provided in the application concerning more distant views from the surrounding district towards 200 metre high turbines. The absence of evidence of the likely blight caused by the proposed turbines on landscape views from extensive areas of the Monaro should alone result in the application being refused.

4. Safety Regarding Transport of Components

The suggestion by the applicant that approval be given to moving parts of the turbines yet to be identified along roads yet to be identified to the site is unacceptable. Previously, parts for the existing turbines were transported over a lengthy period during usual business hours along the Monaro Highway through Bombala causing considerable disruption to other road users. The procedure involved escort vehicles some distance ahead to warn vehicles of the approaching transport vehicle. The Monaro Highway was and is unsuitable for the transport vehicles being too narrow, having tight curves with little space to get a vehicle off the sealed surface and with few safety fences to prevent vehicles from going over the edge of steep drops. The result was that on one occasion I had to get my vehicle off the road and stop, with no safety fence and a steep drop next to my vehicle when the transport vehicle occupying much of the roadway passed. It was a dangerous situation. My wife had a similar experience on another day at a different place on the Monaro Highway. When my wife saw the transport vehicle approaching she stopped her vehicle as far off the road as the safety fence would allow, and the transport vehicle slowly edged past, almost touching her car. There was no warning of the approach of the transport vehicle.

If new turbines require even larger components, transport along the Monaro Highway will again be unacceptable. Leaving the transport arrangements of turbine components to others was not acceptable previously, and will again be unacceptable.

The applicant should be required to specify precisely what turbines are being proposed, what components are required to be transported and how and when that transport will be undertaken. If components for turbines cannot be safely moved by road or are too heavy for a helicopter, the turbines should not be approved.

The proposed disruption to users of the Monaro Highway for a further extended period of 12 months or so during usual business hours is unacceptable. Such a proposal would never be acceptable in an urban area. One business for its own benefit should not be permitted over a period of a year to disrupt all other businesses and members of the public in the use of a public highway. In my lifetime I cannot recall any such disruption to the public in the use of a public highway. Any transport of materials should take place from 1.00am to 6.00 am only. No transport should be permitted to carry materials if that transport is required to drive wholly or partly on the wrong side of the road at any place, or if the transport forces vehicles travelling in the opposite direction to stop or pull off the roadway for their own safety. Finally, transport of any materials for the proposed project from Eden via the Monaro highway should be permitted for a strictly limited time, so that all materials required to be moved are moved continuously to minimise disruption to other users of the road and not over an extended period to suit the developer.