



Your Reference: MP 10\_0156  
Our reference: DOC15/417184-03; EF15/152  
Contact: Sharon Peters (62297002)

Mr Neville Osborne  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

13 November 2015

Dear Mr Osborne

**RE: Collector Wind Farm Project (MP10\_0156 MOD 1) - Exhibition of Modification Application 1 – EPA Comments**

I refer to your email of 20 October 2015 inviting comments from the Environment Protection Authority ('EPA') in relation to a proposed modification of the Project Approval for the Collector Wind Farm Project located in the Upper Lachlan Shire ('the project').

The project was approved by the Planning Assessment Commission on 2 December 2013. RATCH–Australia Corporation Limited ('the proponent') is seeking to vary the Project Approval to include:

- Noise limits based on updated background noise measurements conducted at the two (2) nearest non-involved receiver locations, consistent with the types of noise limits that are normally applied to wind farms in NSW;
- An increase in the turbine blade length from 56 m to 58.5 m, equating to a total allowable rotor diameter of 117 m, with no change in the allowable maximum tip height of 150 m; and
- Refinement of the layout of site roads, electrical cabling, and project buildings.

To assist the Department of Environment & Planning with its assessment of the application, the EPA has reviewed the modification application and supporting documentation including:

- 'Collector Wind Farm Modification Assessment Report' prepared by NGH Environmental dated September 2015;
- 'Appendix G – Collector Wind Farm Background Noise Monitoring' prepared by Marshall Day Acoustics dated 30 September 2015; and
- 'Appendix H – Collector Wind Farm Candidate Turbine Noise Predictions' prepared by Marshall Day Acoustics dated 30 September 2015 (Noise Impact Assessment).

**Background**

The EPA understands the operational noise criteria in Condition E6 of the Project Approval, are based on a fixed noise limit of 35 dB(A) measured at any non-involved residential receivers. This fixed 35dBA noise limit was set on the basis that noise modelling presented in the original Environmental Assessment indicated the project could meet a 35 dB(A) 'fixed' limit at any non-involved residential receiver. It is also understood that background noise data was considered to be affected by extraneous noise.

It was therefore determined by the Planning Assessment Commission that the noise monitoring at non-involved receiver locations would need to be repeated/updated before background noise dependent limits could be applied.

#### **Updated background noise monitoring – EPA consideration**

A background noise monitoring program at specific receiver locations within and surrounding the Project site was undertaken by Marshall Day Acoustics to establish representative background noise conditions around the proposed wind farm. The EPA understands the monitoring locations were selected in consultation with DPE and intermediate locations and were used to infer the operational noise of the wind farm at distant locations where measurements are impracticable.

The EPA has assessed this additional information and agrees that setting noise limits of 35 dB(A) or background + 5 dB(A), whichever is greater, across a range of operational wind speeds is in line with other wind farms, and consistent with the EPA's adopted policy approach. Whilst the EPA does not have any objections to the use of intermediate locations for assessing compliance with noise limits, the compliance assessment at intermediate locations must be supported by robust evidence of the quantitative relationship between the noise level measured at each intermediate location and each receiver location(s).

#### **Recommendation**

The EPA recommends noise limits be set for locations FF and Z as proposed in the documentation in Table 5.2 of NGH's Collector Wind Farm Modification Report (September 2015). The EPA has no other comments to make in relation to the other aspects of the proposed modification.

#### **EPA Licensing**

Under the *Protection of the Environment Operations Act 1997* (POEO Act) the EPA is the appropriate regulatory authority for large scale wind farms. These are wind farms that have a capacity for generating more than 30 megawatts of electricity. Collector Wind Farm will require an Environment Protection Licence issued under the POEO Act for both the construction and operational phases. The proponent will need to make a separate application to the EPA to obtain this Licence. Any limits in the Project Approval for noise emissions from the wind farm would be reflected in any in any future EPA licence for the Collector Wind Farm.

Thank you for the opportunity to provide comment on this matter. Should you wish to discuss this matter further, please contact me or Sharon Peters of this office on 6229 7002.

Yours sincerely



**JULIAN THOMPSON**  
**Unit Head – South East Region**  
**Environment Protection Authority**