

Planning Services

Department of Planning and Environment

GPO Box 39, SYDNEY, NSW, 2001

Attention: Executive Director – Resource Assessments & Business Systems

Re: Bango Wind Farm (SSD 6686)

Thank you for the opportunity to comment on the proposal by CWP Renewables on the Bango Wind Farm.

Like many others in the community's of Boorowa, Rye Park, Rugby and Yass I am tired of the constant battle to bring companies like CWP Renewable to task on proposals that are inadequate, inappropriate and inaccurate. Like many other companies CWP renewable have not consulted with the affected communities, in this case in particular the people of Boorowa and Rye Park. In Volume 1 page 23 it says CWP Renewables are in partnership with Wind Prospect Group who have developed wind farms world wide totally 141 already constructed as well as many more consented, in pre-construction etc, Table 2.1, and yet the lack of professionalism in this application does not reflect this. Studies and assessments included are not new, and in some cases many years old.

Like many others I have not read the entire 1872 pages of the Environmental Impact Statement due to the size and constant duplication on information in the proposal.

Like many others I am amazed that this proposal could have gone as far as it has when the proposal consists of 122 wind turbines of more than 200 metres tall squeezed into an area of a 10km radius that has so many people living and travelling in the area, and is in the midst of so many endangered animals, birds and ecosystems. The fact that it is a know flight path for the endangered Superb Parrot in their breeding season should be enough for the Department of Planning and the Department of Environment and Heritage to say no this is not acceptable in any form.

Like many others I am dismayed at the many opportunities these 'Renewable Energy' companies have at trying to convince the Department of Planning and the Department of Environment and Heritage when it is clear approval cannot be justified.

According to the Main Report of the EIS CWP Renewable (Wind Prospect) started this proposal in 2008. The one and only 'Public Meeting' before going on Public Exhibition was held in 2012. As a member of the Community Consultation Committee I have had many people comment to me that until the proposal went on Public Exhibition, and advertising of the project was ramped up, they had not even heard of the Bango Wind Farm, or thought it had 'all gone away'. CWP Renewable have had no presence in Boorowa or Rye Park, there has been no signage or notifications of the proposal and no consultation with anyone but those possibly receiving monetary advantage (and the occasional CCC meeting) until the EIS went on Public Exhibition and I hope those making the decision on the project take that fact seriously.

The EIS appears to be put together in a way that makes sure anyone who does venture into the 1872 pages cannot get an accurate picture of the development. The first map showing individual turbines is on page 68 of the Main Report. The first map that actually gives the name of the village of Rye Park is on page 100 (Main project description map). The first map showing Boorowa, Rye Park and the individual turbines altogether is on page 138!

To keep this submission brief I will note other issues I have as an indication of the inadequacy of this document:

- The majority of the maps in this document do not show the town of Boorowa and none of them show the village of Kangiara.
- Page 139 gives the list of key consultants but Essential Energy, the areas main energy supplier, is not listed.

- Where is newsletter 3. Notes 1 and 2 but there is no evidence of 3. Number 4 only circulated after EIS on public exhibition. 8 years of planning and supposed Public Consultation and they can only manage 2 newsletters.
- Page 165 has the Visual Significance table. How can the visual significance of turbines over 200 metres high on the tops of hills be anything but high to anyone with a direct view living anywhere within 10kms of the development when they have been used to a rural landscape.
- Shadow Flicker for traffic on the Lachlan Valley Way. Where is the assessment for this?
- Page 170 re overlap of Rye Park Wind Farm and Bango Wind Farm. The fact that an area of overlap has been identified for those living within 5kms of both, and the turbines in that area are still being proposed is unthinkable. The entire village of Rye Park, if the maps were done accurately, will fit into this area, and still no consideration for these people is something that must not be tolerated. The EIS states that Residences 051 and 048 are the only ones visually impacted, and the assessment is 'moderate to low' show a complete lack of understanding as to why these people live where they do.
- Page 173 mentions the Landscape Plantings where screening is deemed as appropriate. How long do these people think it will take for plantings to screen 200m turbines on the top of hills. These plantings would need to be extremely close to homes to enable total blocking, imprisoning them from the view and increasing the bushfire risk to these homes.
- Mention in the EIS that they will 'limit the size of stockpiles' during construction. What a ridiculous consideration taken the size of the completed turbines that will be permanently in place!
- Page 203 stated no serrated tussock was found. As serrated tussock can be found throughout the area how hard did they look?
- 10.3.2 Says exotic species of plant life only covers 22% of the development area. Does that mean they will be disturbing 78% of native flora?
- Figure 10.4 indicates study results for the 200m corridor only and not the surrounds, and the studies were done in 2012? A lot of work has been done over the area since then to preserve remnant vegetation, increase habitat areas and preserve critical flora. No consideration in the EIS appears to be given to this recent work of many individuals and groups, including government departments and taxpayer funding, to increase the size of these critical areas.
- Page 207 lists the large number of 'Fauna Groups' in the proposal area. Will this be taken into consideration?
- Page 212, figures 10.11, 10.12, and 10.13 Threatened species tables. These are dated 3/5/2013. If this is the date of surveys they would not have found many Superb Parrots around at this time of the year and needs clarifying. And again surely studies more recent than 2013 could have been found to more accurately indicate the current story.
- Page 217 and 218 says there will be permanent removal of vegetation over a large area totalling 104.77 hectares. Is the proponent going to communicate to those birds, animals and reptiles using that vegetation and tell them "you are going to have to hang on for 100 years and then move to the spot where sequestering has occurred? Sorry for the inconvenience.....must destroy the environment to save the earth"
- Page 255, 10.4.4. The cumulative impacts associated with up to 4 four Wind Farm proposals within the region has been assessed as "Low to Negligible". If we lived in the middle of Sydney or Melbourne the impact of 200m high structures would be low to negligible. How dare CWP Renewables come into a rural community that pride themselves on their environmental restoration works, and in many cases choosing to be here for the wide open spaces and natural landscapes, and tell us we will not notice them. The city of Canberra is not allowed to build structures this big, and yet we are supposed to tolerate it so Canberra can brag about using 'green renewable energy'.
- Page 261 CASA recommends that as the turbines will be greater than 152.4 metres above ground level they should be lit in accordance with the NASF Guideline D (re Appendix 15 for the statement recommending that they be lit). For those with an uninterrupted view at night this could prove to be a huge distraction, and would certainly pose a risk to those travelling the Lachlan Valley Way at night.

- Page 326 states “Once the Project is operational there would be a small number of permanent jobs available”, therefore the perception that the project will create jobs is false.
- Page 301, 17.5 re use of Groundwater and unused allocations. The entire area of this development is in the Boorowa River catchment which is the only source of water for the Boorowa township. I was not able to find any study on the impact to this water supply during construction and operation. This is already a precarious water supply and yet the proponent plans on negotiating the use of groundwater and unused allocations of river water where available. This will restrict runoff in the catchment area as the groundwater storage facilities (dams) will need to be replenished after rain, restricting runoff into the river, and the town water supply, when the town needs it most. The EIS states that 15 megalitres of water will be needed for concrete alone, a further 45.9 megalitres for roads and dust suppressant, and 1 megalitre of this will come from rainwater. 1 megalitre of runoff taken from the Boorowa water supply in late summer will cause a critical event for hundreds of people and livestock and has not been deemed important enough to mention.
- No consideration has been given to the possibility of contaminated runoff into the Boorowa River and the Boorowa water supply, and what about seepage from the large concrete pads into the groundwater.
- Page 333 refers to a land values study based on the small Crookwell 1 wind farm (Henderson and Horning 2006) and states Wind Farm Development had the potential to slow down the shift from agricultural to rural residential development. This gives us an indication that people do not want to live near Wind Farms and these developments in the Boorowa, Rye Park areas will put a stop to the trend of Rural Residential development in recent years from Canberra and Sydney to our rural communities. Surely the resurrection of our country communities hinges on increased population more than it does on the provision of half a dozen permanent jobs on a massive industrial development. Community enhancement schemes will not put children into schools and customers into small businesses.
- Page 337 mentions the potential for ‘Wind Tourism’. How many times will a tourist return to visit Boorowa or Rye Park to see wind turbines. Where is the proof that Bungendore, Crookwell and Taralga have increased tourism, and the proof that people are returning over and over again to see them? People do return to Boorowa and Rye Park over and over again to enjoy the landscape, eat the food and experience the rural community. There is greater potential for our local communities in clean, green food production and promotion, endangered species conservation and the alternative lifestyle. These things are already so scarce in the world and further industrialisation to destroy these is not the answer. Cities are already overflowing and using enormous amounts of energy. The building of large scale wind farms is removing our area from the potential of taking the pressure off these cities in a more environmentally positive way.
- Page 337 keeps mentioning the Yass LGA. This development is far removed from the town of Yass and yet they stand to benefit the most from the development process and ongoing community enhancement funding. Workers will not be living in Boorowa as there is already a housing shortage, and why should Yass get new parks, buildings, services etc when they won’t see or hear the turbines and yet Boorowa and Rye Park will be greatly impacted. Now that Boorowa and Rye Park are part of the amalgamation of Young and Harden into the Hilltops council these towns far removed from the development will also benefit. The majority of the proposed Hosts also gravitate to Yass for shopping and schooling and will not be spending their Host payments in Boorowa. Again this is further fuel for the fracturing of our communities.
- Pages 339 and 340 does mention Community Division but very little time and effort has been spent on mitigating this, in fact the secrecy of the project has been a major factor in encouraging division. CWP Renewables think that bribery (Community Enhancement Funds and Neighbour Agreements) can mitigate against neighbour impacts. At least there is some recognition of the cumulative impact of community division due to the number of wind farms proposed in the area, however this should be taken far more seriously by the Dept Planning that what the proponent has given it.
- Page 342 of course mentions the NHMRC review (a favourite of wind farm companies), however this review did recognise the need for further research into the health impacts of wind turbines. This research needs to be finalised and conclusive before any further wind development is approved. In the unlikely event that

‘annoyance’ is the only effect of wind turbines surely this should be taken seriously. Annoyance is used in torture techniques and annoyance can cause major mental health illnesses. There is no mention of these and how these will be mitigated.

- Neither the Introduction or the Project Description mentions the height of the proposed turbines. Is this a deliberate ploy to make sure we do not know how large these structures will be?
- The Landscape and Visual Impact section does not mention the turbine height.
- The Aviation assessment does not mention the overall height of turbines.
- The Noise Assessment is the first to mention any measurements but also does not give an overall height. Option 1 will have a hub height of 80 metres, Option 2 will have a hub height of 120 metres.
- Page 55, 3.3, Wind Farm Infrastructure finally says the blades (rotor) will be between 74 and 144 metres long. Does this mean we have the potential of 120 metre to hub + 144 metre blades = total height of 264 metres? 3.3.2 -LVIA report uses a blade tip of only 192 metres. Big difference in what is possibly being proposed and what has been studied. No approval should be given until the actual turbine to be used is specified, and the noise and visual assessment studies on that turbine model are completed.
- Page 8 of the Transport Assessment 2.3.1 states the main collector substation will occupy an area of approximately 150m x 150m. I understand this is an assumption that is very much understated as demonstrated in the attached news article showing a substation at the Gullen Range Wind Farm covering about 25 hectares.

As is obvious I have not, and cannot, read the entire EIS document and trust that others have been able to alert the Department of Planning and the Department of Environment and Heritage to other areas that show the inadequacies of this document and reasons why this proposal should be refused. The information and maps within the document do not give a true indication of the size of the proposal, distances to homes, towns and villages, and the studies and papers within the document are all outdated.

There has not been adequate information and consultation with those who will be affected even though the planning for this development has been going on since 2008.

I feel that the reason this EIS is so inadequate is that CWP Renewables staff have not actually spent much time in the area. At the ‘Public Information Day’ held in Boorowa on 3 November 2016, half way into the Public Exhibition process, I was speaking to a CWP Renewables employee Mark Wiggins. Mr Wiggins admitted that this was the first time he had been to Boorowa, and yet this man was supposed to be telling the locals about the project and how good it will be for the district. How then would he know what makes the community of Boorowa tick, and the sensitive issues facing our endangered birds etc. As an example of his lack of knowledge I was involved in a conversation with him about Meads Lane, which is earmarked as a major transport route around Boorowa to access the Langs Creek cluster. Meads land is narrow, less than 4metres wide and lined with old overhanging trees, and has a tight turn to access Long Street. When it was mentioned to Mr Wiggins that for the heavy transport to access this road the entire tree population would need to be removed. He said this was just a suggested route and the reason for the consultation process was to find alternatives if needed. His alternative suggestion was to use the main street of Boorowa as they had in Nimitabel, and yet the Transport Assessment page 17 states that the construction traffic would not be able to access the town centre due to pedestrian refuges and the Pudman Street roundabout restricting larger vehicle access. If Mr Wiggins had even ventured into the main street of Boorowa during his visit he would have known this alternative route using the main street was not possible, and obviously he had not read the EIS either.

Mr Wiggins was also of the opinion that the Public Information Day we were attending on 3rd December 2016 was the start of the public consultation period for the Bango Wind Farm. When I questioned this comment by saying the project was on Public Exhibition, the EIS was with the Dept of Planning and we were now nearing the end of the process he was adamant that we were only at the beginning and final plans will be put together following this public consultation period! Sounds like this man had been kept in the dark just like the locals.

Other areas of concern about the information day were the lack of photomontages from the township of Boorowa, even though there is one in the EIS, and no photo montages from the Rye Park Road between Boorowa and Rye Park. I was also alarmed to see Charlie Prell of the Australian Wind Alliance with a stand at the information day. Australian Wind Alliance have a relationship with CWP Renewables, and have a campaign currently running to gain favourable submissions for the Bango Wind Farm, and I hope these template submissions from other areas of the country and the world will be scrutinised accordingly. At the CCC meeting of 26th October 2016 Siobhan Isherwood, Project Manager, admitted that CWP Renewable have made financial contributions to Australian Wind Alliance in the past, saying that most recently they had paid Australian Wind Alliance for a bus trip to the Taralga Wind Farm.

The Boorowa district has prided itself for many years on the achievements of land carers who put a lot of time and money into the preservation of Superb Parrot habitat, and the Superb Parrot is the town emblem. Children of the schools or St Josephs Primary, Boorowa Central and Rye Park Public have for many years also been involved in projects aimed at the Superb Parrot. Recently new signs have been erected at the entrances to the town welcoming visitors to our 'Superb Country' and urging us to 'Retain Large Trees – Dead or Alive' (newspaper article attached). The approval of 122 large wind turbines, along with the possibility of many more similar projects side by side, will decimate the Superb Parrot population. Will we then need to get these children to create artworks for new signs, and what will these signs say? "Welcome to Boorowa, we have cut down all the trees, dead and alive, we have not managed to Save our Species, but we do have hundreds of wind turbines for you to look at that are saving the environment".

I urge the Department to reject this proposal in any form as I believe CWP Renewable have not been able to demonstrate a positive outcome for the residents of Boorowa, Rye Park and surrounding communities, the flora and fauna surrounding the project area, or the benefits of this project to the world as a whole.

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