

Planning Services

NSW Department of Planning & Environment

GPO Box 39

SYDNEY NSW 2001

RE: Rye Park Wind Farm Project Application – Application Number 10-0223

Attention: Executive Director, Resource Assessments & Business Systems.

I object to this project.

Environmentally, the Rye Park turbine site is to be situated on the watershed for the tributaries of the Pudman Creek and Blakney Creek. Both waterways are important for humans as well as flora and fauna in this area. The original EA stated that the ridges are basalt. The only basalt site in the area is at Crookwell which raises the possibility of this being transcribed from the Crookwell wind farm proposals and this should bring into doubt all the other statements in this company's submissions.

Even though they have admitted that the rock type is shale which is '*a fine-grained sedimentary rock that forms from the compaction of silt and clay-size mineral particles that we commonly call mud*' they still state that the risk of erosion resulting from the degradation of the ridges is manageable. It will of course be a huge issue because shale is highly erodible and, as stated by a local Earthmoving Contractor with many years of experience working in this area '*no amount of silt fencing will stop it 'washing' in the type of downpours that we get*'. This will be worse on the ridges as the ground cover will not regenerate. The footings and hardstand alone will be 25m x 60m x 2m per turbine, which is a huge amount of disturbance. The scar on the landscape caused by the building of the Sydney to Moonba gas pipeline nearly 20 years ago is still obvious and that ran across better countryside than this will. The biggest impact will not be the siting of the turbines but the connecting roads according to Craig Sponholtz of Watershed Artisans after his presentation of the Land Restoration Workshop in Rye Park 31/5/2014. "*Roads alter water movement across the landscape, which can concentrate and accelerate flow and cause soil erosion and gully formation. Sediment-laden runoff from road surfaces, and their associated ditch systems, can be a major source of water pollution and turbidity.*" (Bill Zeedyk, April 2006, A Good Road Lies Easy on the Land...) Page 194 states that "*prior to the commencement of construction the Proponent will prepare a Biodiversity Management Plan in consultation with OEH. The plan will include measures to **minimise** the amount of clearing required for the development*". However in section 6.3.2 it states that "*overall the estimated extent of vegetation clearing has increased slightly – 284.9 ha versus 235.9 ha originally estimated in the EA.*" That is nearly 50 ha (123 acres) more, a figure that cannot be considered 'slight'. This proposed loss of vegetation is happening at the same time as Greening Australia is co-ordinating projects which are targeting the area to protect and revegetate woodland (see Bush Connect Program: Yass Habitat Linkages: commencing 2016).

There is no acknowledgement in the Response to Submissions of the effect on the platypus and turtles in Pudman Creek but they state on page 80 that a **revised desktop** assessment states "*two additional threatened species have been identified as occurring within or in close proximity to the project site being the Southern Pygmy Perch and Yellow-spotted Bell Frog. Impacts to these species are considered to be manageable.*" Dumping sediment into the creek will kill these creatures as well as other species in the creek. There is a statement in the Response to Submissions that there will be "*specific consideration to be included in the Construction Environmental Management Plan for the project to protect Blakney Creek and its tributaries from sedimentation and pollution*". What about Pudman Creek? The Pudman Creek is one of a handful of waterways in NSW without carp or redfin infestations which decimate the native fish population. Endangered Southern Pygmy Perch have been introduced into the Pudman Creek in an effort

to save them from extinction. The last survey of the Pudman Creek reported by Luke Pearce from the Department of Primary Industries (DPI) in April 2016 showed that the fish are establishing themselves well in the creek. Sediment flow caused by excavation for turbines 76,78 and 79 especially will have a devastating impact as the gullies feed into the Flakney Creek which then feeds into the Pudman Creek. The NSW DPI states that there are “*significant penalties for causing damage to the habitat of a threatened species without approval through actions... The impact of developments or activities that require consent or approval (in accordance with the Environmental Planning and Assessment Act 1979) must be assessed and considered by consent or determining authorities. Where such actions are likely to result in a significant impact on a threatened species or its habitat, a detailed species impact statement must be prepared.*” There is no impact study in the Response to Submissions only the statement that “*the success of the project in meeting the environmental requirements of “maintain or improve” relies on the effective implementation of an Environmental Management Strategy for effective environmental management of the development*”. This is compounded by the statement “*Refer to Appendix C – Biodiversity Assessment for confirmation that the Project is not likely to result in a significant impact on any fauna species listed under the TSC Act and, accordingly there is no requirement for a species impact statement to be prepared*”. There is a great risk to all species that inhabit the local creeks because of the high risk of erosion and resultant sediment.

The Proponent has not:

- committed to any recognised Code of Practice i.e. “A Resource Guide to Local Councils Erosion and Sediment Control”;
- committed to Third party Environmental monitoring and auditing;
- committed to achieving their own Environmental Certification;
- commenced Baseline Stream and Water Quality Monitoring;
- committed to Baseline fish and frog species monitoring;
- identified how environmental breaches will be addressed.

Any ‘Management Plans’ should be presented before planning approval is granted.

I reserve the right to submit further submissions