

Response to Trustpower's Response to Submissions (RTS) – Rye Park Wind Farm

The proposed Rye Park Wind Farm consists of up to 109 wind turbines and associated infrastructure. The wind farm project is located to the north of Yass and south east of Boorowa in New South Wales. The site is approximately 250 km south west of Sydney. The Proponent for the Project is Rye Park Renewable Energy Pty Ltd, a wholly owned subsidiary of Trustpower Australia (New Zealand) Limited, an Australian renewable energy company.

The Rye Park Wind Farm proposal has been transitioned from a Transitional Part 3A Application to a State Significant Development (SSD).

I thank you for the opportunity to respond.

I remain opposed to the proposed Rye Park Wind Farm

Since my original submission in 2014, my concerns regarding the use of Cooks Hill Road and Blakney Creek road have not been alleviated.

Both roads contain unsealed sections which Trustpower have misrepresented by their map in the RTS.

Page 31

Figure 3-9 Southern region site layout

Incorrectly portrays both Cooks Hill Road AND Rye Park Dalton Road as being sealed road in their entirety.

Both roads suffer degradation with the current traffic levels and increase in this magnitude could see a doubling based on the proposed numbers.

Local usage rates – did they not have access to more up to date figures?

- ▶ 118 – 298 vehicles per day (9 – 19% heavy vehicles) at various places on Cook Hill Road from 2009.
- ▶ 89 – 91 vehicles per day (12 – 14% heavy vehicles) at various places on Blakney Creek Road from 2006 and 2011.

Corrugation and pot holes are a common occurrence and repairs are restricted by council budget and inclement weather. As evident by the repairs to Cooks Hill Road listed in this 2011 report, it is evident that repairs are costly so I would like assurance that Trustpower will provide a bond to ensure road repairs are timely.

- Cooks Hill Road scour repair - \$30,000
- PR9- Cooks Hill Road - pavement rehabilitation & drainage 1km - \$175,000

Certainly the relocation of Martin's Fertiliser business premises has reduced impact on Cooks Hill Road in particular and allowed for long overdue repairs to be carried out. 18 months to 2 years of construction traffic will take their toll.

I would also expect that this has had a reduction on the vehicle data for local usage.

In particular the steep road leading up to Blakney Creek Road now has a good quality surface.

The road down by the rail crossing is indicative of what the road was like prior to resurfacing.

The proposed traffic volume that will be incurred for the construction period will lead to amplified degradation of these roads and will pose increased risks to my two teenage learner drivers.

If I am to read the RTS correctly, is the burden of cost going to be placed back on our councils while the wind farm is still under construction?

92 Response to Submissions – Rye Park Wind Farm Access road upgrades 6.5.2

*Where the Proponent has sealed roads, **the maintenance during construction** and operation of the wind farm **will be by the local road authority.***

Is not the proponent responsible for costs during the construction phase? Once the wind farm is officially opened it would make sense the cost then passes over.

12. Rye Park Wind Farm RTS - Appendix E - Traffic and Transport Assessment

The proponent themselves have acknowledged construction could take place over years, yet Cardno have gone with a conservative 18 months construction period. I would have thought they should supply worst case numbers ie 2 years.

*The project is expected to support a total of over 470 sustained jobs in NSW and 144 in the ACT over **a three year construction period.*** (157 Response to Submissions – Rye Park Wind Farm)

Construction Traffic Generation

Calculations have been performed to quantify the number of vehicle movements predicted on council roads as a result of the proposal. Movements within the site that do not utilise council roads have not been included. Table 5-1 on the following page shows the estimated transport task associated with the project and is broken down by vehicle type. Table 5-2 shows additional details on the predicted two way traffic volumes during construction. Based on these estimates and an 18 month construction period with 22 working days per months results in the following predicted daily truck traffic volumes:

Table 5-1 Total transport task and typical vehicles *Total 30,110*

Note: A trip is defined as a vehicle movement in a single direction, either to the site or from the site.

*30,100 trips / 18 months / 22 days = 76 **total two way** truck trips per working day.*

Table 5-1 identifies this is single trip calculations, so shouldn't the above sum be doubled (x2) and 18 months increased to 24 months to give the total two way traffic? Epuron was criticised for the misleading nature of the way the table

presented in their EA. Unless you read the small print at the end, you would take the table as total trips.

So should the new calculation actually be:

60,200 trips / 24 months / 22 days = 114 total two way truck trips per working day.

Construction staff traffic can be estimated based on peak staff on site of 150 and 1.5 persons per vehicle: $150 \text{ staff} / 1.5 \text{ per vehicle} \times 2 = 200$ total two way light vehicle trips per working day.

Further, if you know add the figure from table 5-1 and the construction staff traffic we get a daily total of $114 + 200 = 314$ **total two way vehicle trips per working day.**

Rye Park Wind Farm Design Memorandum – Traffic Assessment prepared by Cardno (NSW/ACT) Pty Ltd

Table 4-1 Site access routes on local roads

Over-dimensional and over-mass routes				
Road	Purpose	Start – End	Length (m)	LGA
Cooks Hill Road	Access Point 5	Faulder Ave to Rye Park Dalton Road	18,300	Yass Valley Council & Upper Lachlan Council
Blakney Creek Road	Access Point 13	Cooks Hill Road to Rye Park Dalton Road	7,900	Yass Valley Council & Upper Lachlan Council

This is a significant increase in the volume of traffic as well as the size and weight of vehicles travelling on these roads. Trustpower - light vehicle definition - < 4.5 tonnes (included on maps prepared by Cardno)

Cooks Hill Road has a number of blind verges and corners which can be a trap for drivers unfamiliar with the local roads. The main gas line running down both Cooks Hill Road and Blakney Creek Road would limit the amount of road widening that can take place.

I also question why they would transport cement from Port Kembla, could they not source locally?

88 Response to Submissions – Rye Park Wind Farm

Cement and steel is likely to be travelling from Port Kembla.

Fire Management

As a volunteer to the NSW CFA (Country Fire Authority) I certainly have concerns regarding how they propose to manage fires some 80 metres off the ground.

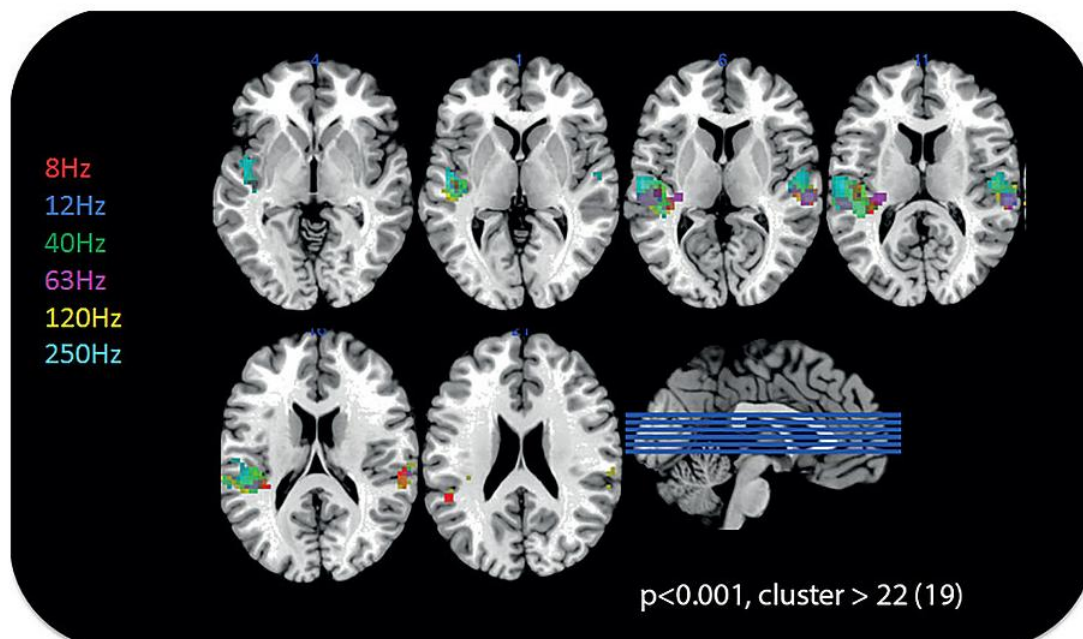
- Who is responsible for removal of the toxic material should an industrial wind turbine catch on fire?
- Does the proponent pay for any disposal costs?
- Does the proponent pay for any costs borne by the NSW RFS having to fight an industrial wind turbine fire?
- Does the proponent pay for any damage to neighbouring properties?
- Where is the toxic material disposed?
- What is the management plan for toxic fumes created by an industrial wind turbine catch fire?

Health

I have concerns regarding health as I don't accept sufficient research has been undertaken upon the effects of accumulative exposure to Infrasound and Low Frequency noise (ILFN). Having a trade qualification and over 23 years in the maintenance sector I am well versed on the effects of audible noise so it comes as no surprise that mechanical devices of an industrial scale should undergo greater scrutiny for the ILFN they emit.

The National Health and Medical Research Council (NHMRC) has awarded two grants totalling \$3.3 million to enrich the evidence-based understanding of the effects of wind farms on human health.ⁱⁱ The science is not settled, the current research is poor in nature as identified by the NHMRC themselves.

See https://www.ptb.de/emrp/ears-downloads.html?&no_cache=1&cid=3148&did=9893&sechash=f05e4973



From PTB:
<https://www.ptb.de/cms/en/presseaktuelles/journalisten/press-releases/press-releases-article.html>

The international project led by the National Metrology Institute of Germany (PTB) concludes that exposure to infrasound below the range of hearing could stimulate parts of the brain that warn of danger. It finds that humans can hear sounds lower than had been assumed and the mechanisms of sound perception are much more complex than previously thought.ⁱⁱⁱ

The NSW Department of Planning & Environment should make it a matter of priority to finalise the *Draft NSW Planning Guidelines - Wind Farms - December 2011*. This will ensure consistency of approach and provide confidence to residents so they can move forward with their lives rather than be left wallowing in limbo.

I would recommend that a time frame be applied to any approved wind farm proposal that construction must commence within a set time otherwise the approval would lapse. I would propose 5 years to be a reasonable time frame. There has to be a definition as to what constitutes construction to ensure there is no ambiguity to either the proponent or citizens.

i

<http://www.yassvalley.nsw.gov.au/sites/yassvalley/files/public/images/documents/yassvalley/mig/23.3.14761-2011DORreport.pdf>

ii <https://www.nhmrc.gov.au/media/releases/2016/nhmrc-awards-funding-wind-farms-and-human-health>

iii <https://mothersagainstwindturbines.com/2015/07/16/the-effects-of-infrasound-are-shown-in-this-study-critiqued-by-dr-sarah-laurie/>