

## 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**

I reiterate my original concern stated in my submission to the Epuron EIS back in July 2014. ( Rye Park Wind Farm Project Application – Application Number MP10-0223)

*I wrote to the NSW Department of Planning and Infrastructure regarding the Draft NSW Planning Guidelines - Wind Farms - December 2011.*

As per their site - Submissions were sought and received back by 14 March 2012.

Extract from the document titled “Draft QUESTIONS AND ANSWERS December 2011”

#### **15) When will the wind farm guidelines come into force?**

The guidelines are currently in draft form and are being publicly exhibited. The department will carefully consider submissions received during the exhibition period, before reporting back to the Government with a recommendation. **It is intended that the wind farm guidelines could be in place by the middle of 2012.** (My emphasis)

As of 2 June 2014, their official position on the guidelines was:

*Some key elements of the Wind Farm Guidelines are currently being finalised, including more stringent noise criteria and a more rigorous upfront consultation process before a development application can even be lodged.*

*Given the Guidelines are a whole-of-government document, we are particularly mindful of the need for alignment with other important legislative and policy work currently being undertaken.*

**Doesn't inspire confidence in me that the planning decision is in the hands of the very Department that after four years now is still yet to finalise its own guidelines!**

**The Gullen Range Wind Farm fiasco should have been the catalyst for finalising these guidelines!**

This failure has resulted in Trustpower stating they will not abide by the draft guidelines as they have not been ratified - CCC Minutes 26 August 2015.

Trustpower's response to council submission issue shows they hold little to no consideration for non-involved neighbours.

Issue	Response
Council recommends that turbines within 2 km of existing dwelling be deleted if no agreements in place with uninvolved landowners as per Draft NSW Wind Farm Planning Guidelines	As outlined above, the gateway process proposed in the draft guidelines is not in effect and does not apply to the project.

*Visual Impacts - Minor relocations of wind turbines along existing ridgelines within the Turbine Corridor will in general have minimal visual impact from a distance. However, in order to minimise any visual impacts, all houses within 2 km of the existing wind turbine locations were identified, and the distance to nearest turbine determined. A buffer was then mapped around these houses to ensure that no wind turbine moved more than **5% closer to the relevant residence**. Note, 5% at 2 km relates to a maximum 100 m micro-siting distance. These buffer areas were excluded from the Turbine Corridor.*

This was further confirmed by the Minutes of the CCC meeting held 26 August 2015.

*Approximately 25 dwellings within 2 km. "There will be dwellings within 2m."*

*Q Was the 2km buffer set on a 1.5mw turbine? No, set on the presence of the tower, regardless of the size of the turbine.*

*Approximately 1.5 km between a turbine and a non-involved dwelling.*

Why then in the Rye Park Neighbour Deed<sup>i</sup> page 3 do they prevent a neighbouring property from building within 2km?

(c) such other activities consented to by Us in writing,

but excluding the building, erecting or placing of, or permitting the building, erecting or placing of, **any Dwelling within two (2) kilometres of a Wind Turbine or a Proposed Wind Turbine** from the date of this Deed, other than where such Dwelling has been consented to by Us in writing (such consent not to be unreasonably withheld, unless such Dwelling will adversely affect the operation or development of the Wind Farm).

## It's a numbers game

**Why should 27<sup>ii</sup> or is it 43<sup>iii</sup> involved landholders have the right to impose this radical a change upon neighbours and the broader community!**

- Epuron Community Open Day held at Rye Park on 21 May 2014 – on a show of hands of the 32 present - 23 opposed vs 9 in favour (4 employed by Epuron) (I was there at the vote)
- Residents ran a Community Open Meeting at Rye Park Hall Friday 10 June 2014 with 104 in attendance. Of the 88 people who participated in a poll - **80 (91%) were opposed**, 6 (7%) were in favour and 2 were undecided.
- **141** Response to Submissions – Rye Park Wind Farm

## 9.2 Submissions received

The Department of Planning and Environment received a total of 131 submissions - 12 were from government agencies and 119 were from members of the community. **Of the 119 public submissions, 8 were in support of the project and 111 objected to the project.**

- Community Public Meeting held at Yass Memorial Hall on 9 October 2015 – over whelming majority again opposed the proposed wind farm
- Petition to “ban Wind Farms in the Southern Tablelands and South-West Slopes received over a 1000 signatures and was tabled in the NSW Parliament in March 2016.

*An application for project approval for the Rye Park Wind Farm under Part 3A of the Environmental Planning and Assessment Act 1979 (NSW) was lodged with the Department of Planning and Environment (DPE) in January 2011. An Environmental Assessment (EA) report was prepared and placed on public exhibition from 2 May 2014 until 4 July 2014.*

The public had just **9 weeks** (63 days) to try to read through over 1000 pages and make a submission. Epuron received the Director-General’s Requirements (DGR) 14 February 2011 and therefore had over three years to compile their EIS, yet were unable to accurately identify properties that fell with 5 KMs of the proposed Rye Park Wind farm. One property was over 100 years old and the Epuron representative at the Open day asked the owner if it was a new build!

## Public opinion

### Community attitudes to wind farms and renewable energy in NSW<sup>iv</sup>

Epuron EA submission for proposed Rye Park wind farm

*In 2010, the NSW Government commissioned an independent polling company to survey over 2000 residents and 300 businesses in regional areas in NSW on attitudes to wind farms and renewable energy.*

*The consultants surveyed 2022 residents aged 18 years or older across the six Renewable Energy Precincts and a ‘control area’ in regional NSW. It also covered 300 businesses across the six precincts. The research was undertaken via telephone interviews over May and June 2010.*

Extract of the six Renewable Energy Precincts

<b>New England Tablelands</b>  <b>POPULATION:</b> Approx 172,000 adults  <b>Survey:</b> 70% in town, 30% out-of-town	<b>NSW/ACT Border Region</b>  <b>POPULATION:</b> Approx 101,000 adults  <b>Survey:</b> 71% in town, 29% out-of-town	<b>Central Tablelands</b>  <b>POPULATION:</b> Approx 157,000 adults  <b>Survey:</b> 67% in town, 33% out-of-town
<b>Upper Hunter</b>  <b>POPULATION:</b> Approx 30,000	<b>South Coast</b>  <b>POPULATION:</b> Approx	<b>Cooma–Monaro</b>  <b>POPULATION:</b> Approx 23,000

adults  <b>Survey:</b> 64% in town, 36% out-of-town	234,000 adults  <b>Survey:</b> 54% in town, 45% out-of-town	adults  <b>Survey:</b> 63% in town, 37% out-of-town
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## Summary

- The six Renewable Energy Precincts have an adult population combined of 717000
- Telephone survey of residents & business' combined (2322) represents **0.32%**
- **NSW/ACT Border Region** - lowest target of out of town surveyed

Epuron concluded:

One of the key findings from this study was the overall support for wind farms as a source of energy generation within the vicinity of a residence. **85% of the population across the precincts supported wind farms in NSW**, with 80% supporting them within their local precinct, and 79% supporting a wind farm being built 10 km from their residence.

85% of 717000 is actually 609450.

**Based on this survey, including observations made by the project consultation team, it can be concluded that communities in the Yass Valley region are generally supportive of wind farms.**

**Remember** - Telephone survey of residents & business' combined (2322) represents **0.32%**

**Therefore the statement - 85% of the population across the precincts supported wind farms in NSW is a blatant lie!**

It seems time has not enabled Trustpower to get their facts right either in their RTS.

## Inaccuracies / misleading information in the Response to Submissions – Rye Park Wind Farm

### Page 11

Following this, the EA was placed on public exhibition from 2 May 2014 until 4 July 2014. **132** submissions were received in response to the exhibition of the Environmental Assessment of the wind farm, **15 of which was received from government agencies**. 8 submissions supported the project.

**Vs**

### Page 141

The Department of Planning and Environment received a total of **131** submissions - **12 were from government agencies** and 119 were from members of the community. Of the 119 public submissions, 8 were in support of the project and 111 objected to the project.

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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.

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## Traffic movements

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

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.

Vs

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:

30,100 trips / 18 months / 22 days = 76 total **two way truck trips** per working day. (seems a x 2 is missing from the calculation to include return trips)

Construction staff traffic can be estimated based on peak staff on site of 150 and 1.5 persons per vehicle:  
150 staff / 1.5 per vehicle **x 2** = 200 total **two way** light vehicle trips per working day.

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Concrete footings – CCC Minute – 15 x 15 x3

Vs

<b>Table 3-6 Estimated development footprint and site disturbance areas Infrastructure</b>	<b>Quantity</b>	<b>Approx. Width (m)</b>	<b>Approx. Length (m)</b>	<b>Approx. Area (ha)</b>
Turbine footing	109	20	20	4.4

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

Table 4-1 Site access routes on local roads

<b>Over-dimensional and over-mass routes</b>				
<b>Road</b>	<b>Purpose</b>	<b>Start – End</b>	<b>Length (m)</b>	<b>LGA</b>
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

Vs

The access routes differ from that proposed in the EA in 2014. Changes have been made in response to submissions and recent consultation. Wind turbine and other oversize component deliveries are no longer proposed through the outskirts of Yass, on Cooks Hill Road and on much of Blakney Creek Road.

So which one is it? Are these two named roads in or out for **Over-dimensional and over-mass routes**???

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Pg 103 – Figure 30

Map identifying proposed wind farms is misleading. The Rye Park project corridor is shown, yet Yass Wind Farm is just represented by a dot.

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My house still seems to be problematic for now Trustpower to get right on their maps. I had to bring the fact to Epuron's attention at the time of the EA exhibition that in fact that had left my house off all their mapping? Michael Head has freely admitted they relied on Google maps to identify dwellings. These are just a few of the discrepancies I have found in trying to read through the entirety of the RTS. I am sure there are more!

## Time frame – this has been dragging on and on

**From the CCC Minutes – 26 August 2015**

*'The application will be re-submitted at the end of October and will go back out for Public Exhibition.'*

Trustpower did not submit the RTS until 12 May 2016. At the last CCC Meeting held 25 May 2016, Michael Head (Trustpower) advised the RTS had taken only 4 days before the Department determined it was fit for public scrutiny. Again, whilst Trustpower has had significant time to prepare a RTS to submissions received on the closure of the Environmental Assessment 4 July 2014, yet the public now has from 18 May 2016 to 23 June 2016 to submit a response.

At the very CCC meeting the Department representatives attended earlier this year, it was requested of Trustpower to provide hard copies of the RTS (given its sheer size and numerous maps (requiring printing at a size larger than A4) to each member of the committee.

Trustpower were the ones to schedule the last CCC meeting one week after the RTS had already been published before producing only three hard copies citing a \$1000 price tag per copy (e-mail from Michael Head) made it cost prohibitive to supply any more.

They are a large organisation, surely they have access to printing facilities that could have produced the RTS in bulk quantities for reasonable costs. They were after all only loose pages presented in ring binders. On the flip side, if I am to take Mr Head at his word, then this would highlight how completely cost prohibitive this makes it for any public citizen to produce the RTS in hard copy.

Not everyone, my residence being one of them, has internet access at their premises meaning it is not an option to go online to view the RTS. Further, I am one of those people who finds it creates eye strain if I have to spend excessive time reading documents on a computer screen. Given this RTS numbers over 1200 pages and the maps certainly are not viable to view on a standard monitor in any scale of use, again, this is not a feasible option. I, like I'm sure many residents, also have a day job meaning copies held at the library and Yass Council are of no value.

At the CCC meeting 25 May 2016 the question was asked why a hard copy had not been provided to Rye Park residents? Mr Head responded that the Department determine the locations. **THIS IS A MAJOR OVERSIGHT OF THE DEPARTMENT GIVEN THE TOWNSHIP OF RYE PARK IS THE MOST AFFECTED BY THE PROPOSED SELF NAMED RYE PARK WIND FARM!**

I do not believe it is satisfactory for Rye Park residents to be expected to have to travel to the locations listed below in order to have access to a hard copy.

Exhibition Location	<ul style="list-style-type: none"> <li>• Planning &amp; Infrastructure: Information Centre, 23-33 Bridge Street, Sydney</li> <li>• Boorowa Council: 6-8 Market Street, Boorowa</li> <li>• Boorowa Council Library: Cnr Market and Pudman Streets, Boorowa</li> <li>• Yass Valley Council: 209 Comur Street, Yass</li> <li>• Yass Valley Council Library: Memorial Hall, Comur Street, Yass</li> <li>• Upper Lachlan Council: 123 Yass Street, Gunning</li> <li>• Upper Lachlan Council: 44 Spring Street, Crookwell</li> <li>• Nature Conservation Council: Level 2, 5 Wilson Street, Newtown.</li> </ul>
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## Project Justification

### 4.1 Project Benefits

The revised Rye Park Wind Farm proposal would provide the following primary benefits:

☐ In full operation, it would generate more than 1,028,000 MWh of electricity per year - sufficient for the average consumption of around 130,000 homes.

**Rebuttal** – Trustpower have had to revise their projections for SnowTown. Wind is not on a perpetual loop of blowing exactly the same across the region. It's intermittent and therefore cannot be aligned to blow and neither match demand, nor can the energy be stored for later use. Wind farms typical operate at a capacity factor (CF) of only 30 -40 percent of their name plate capacity. Nuclear power generation approaches a CF of 90% - Palo Verde Nuclear Generating station in Arizona USA has a capacity factor of 98% and produces no emissions.

☐ It would improve the security of electricity supply through diversification of generation locations.

**Rebuttal** – Wind Farms in Eastern Australia – Recent Lessons – Paul Miskelly

Study of the eastern Australian grid – geographically the largest, most widely dispersed, single interconnected grid in the world.<sup>v</sup>

☐ It will save 800,000 tonnes carbon emissions per annum, equivalent of removing 260,000 cars off the roads per annum.

**Rebuttal –REM report 2014**

Greenhouse gases increased by 1% in 2014 despite a 1.1% reduction in electricity generation, largely due to significant drops in hydro.

Conventional power plants running at less than full power have reduced thermal efficiency and increased CO2 emissions per KWh delivered.

☐ It would contribute to the State and Federal Governments' target of providing 20% of consumed energy from renewable sources by 2020.

**Rebuttal** – We would be better placed to manage consumption (changing behaviours of consumers when water restrictions came into effect was so effective that ACTEW AGL had to increase charge rates to recover lost revenue). Australians need to learn to live within our means.

☐ It would contribute to the NSW Government's target of reducing greenhouse gas emissions by 60% by the year 2050.

**Rebuttal** – Portland Cement contributes 7% of CO2 emissions globally. Concrete is listed as the building material with the greatest environmental impact. It produces more than 5% man's CO2 emissions.  
*Each concrete batching plant would produce around 400 m<sup>3</sup> of concrete per day when a turbine foundation is being poured. The batching plants would only be used during construction of each stage of the project, and each plant would produce around 850 tonnes of concrete per day during its operation. This is equivalent to around 110,000 tonnes of concrete during the construction phase for foundations.*

If reducing greenhouse gas emissions is the government's objective then it should look at Nuclear power – zero emissions!

Nuclear Power Generation Plant - According to the Arizona Public Service Company, power generation operations to date at Palo Verde have offset the emission of almost 484 million [metric tonnes](#) of carbon dioxide (the equivalent of taking up to 84 million cars off the road for one year);

☐ It will provide full time employment for up to 250 staff during construction and up to 12 ongoing regional jobs during its operational life.

**Rebuttal** – Provide post implementation reviews of any wind farm in NSW with a breakdown of any jobs that were created as a result of a wind farm. The figures stated above are simply modeled off a formula of up to 5 jobs being created for every 50 MW of installed capacity. This is flawed, given wind farms can be managed remotely and continues to be a theoretical rather than an actualized number.

*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. Residents of ACT would spend very little if their money in the region. No accommodation required, unlikely they would be dining in restaurants. The best would possibly be fuel and take away – Service Centre and Fast Food outlets may get a surge, unlikely the townships will.*

☐ It will result in a direct injection of approximately \$2-\$3 million per annum to the local community through payments to landholders, permanent staff and community fund contributions

**Rebuttal** – Please provide a breakdown of how this figure was arrived at.

I reiterate - Residents of ACT would spend very little if their money in the region. No accommodation required, unlikely they would be dining in restaurants. The best would possibly be fuel and take away – Service Centre and Fast Food outlets may get a surge, unlikely the townships will.



## Scale – vertical element

There is nothing in the RTS that has alleviated this fact, nor can it.

Fitting that the definition for industrial in the Oxford Dictionary<sup>vi</sup> includes:

- Adjective 2. Very great in extent or amount
  - ‘we are seeing tax avoidance on an industrial scale’

The scale of the industrial wind turbines, 157 metres in height, tapering from around 5 - 6 m in diameter at the base to around 3 - 4 m at the top, 90 m – 130 m overall rotor diameter and numbering 109 in total, plus associated infrastructure, are disproportionate in scale to the selected location. **Currently there are no structures either man made (transmission towers of the large type are typically 50 metres<sup>vii</sup> in height) nor natural structures (trees would be maximum heights much in align with the transmission towers as you can use the latter as a scale reference since they occupy the same landscape) within this region that crosses over three Local Council Areas. This will be further amplified by the fact of locating industrial wind turbines along ridgelines where they will tower over the landscape. Their movement will further draw the eye to them as will the fact that at maximum rotor diameter they will be only 27 metre above ground level.**

Recommendation that the DGR should require the proponent to include a map identifying any utility plant or the closest in the region. This would also assist in assessing visual impact. If there is none currently, the rating should naturally be higher.

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*As a landscape with an overall medium/medium to high sensitivity to change, some recognisable characteristics of the landscape character will be altered by the proposed project, and result in the introduction of **visually prominent elements that will alter the perceived characteristics of the landscape**; however, the degree of alteration may be partially mitigated by existing landscape elements and features within the landscape.*

Even the author of the Visual Impact Assessment – Green Bean Design, by use of language ‘may be’ clearly understands there is no way in which to mitigate visually prominent elements! For R50 for instance, he can offer no mitigation strategies to counter their High Visual Impact rating.

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#### 3.5 Connection to Electricity Grid

##### *“Wind Farm Connection Substation and Connection to TransGrid Transmission Line*

A new 330 kV wind farm connection substation will be constructed to connect the wind farm into the existing 330 kV TransGrid Yass – Bannaby transmission line at the south of the site. This connection substation would cover an area approximately **3 - 4 hectares<sup>viii</sup>** plus an access road, Transgrid switching station, car park, communications tower and site facilities.

Again this is completely out of character with lifestyle blocks and rural communities like Rye Park.

## Bait and Switch

*'A dishonest marketing tactic in which a marketer advertises a very attractive / price /rate / term that is really a teaser rate meant to attract customers'.ix*

A common tactic used by the retail industry to lure consumers into their shops under false pretences.

Whilst wind farms may select an original site based off the wind ratings of the area, they are ultimately opportunistic to the landowners who agree to host wind farms and neither the actual best locations for optimum wind capturing capacity nor the best economical outcome for hosts.

Extract from Epuron EIS 2014 submission

### *Preliminary Layout*

In 2009-10 a preliminary layout accommodating up to 180 wind turbine locations was prepared to guide initial landowner discussions and the progression of community consultation engagement.

The proponent starts by holding secretive meetings with potential land holder's years before it becomes known about in the public domain, the broader community. They **typically target land owners in tough times** – drought conditions, offering them the carrot of financial salvation through hosting Industrial wind turbines and/or associated infrastructure with the only intention of getting them to sign on the dotted line.

This concerns me greatly that the host is now bound by an effectively unbreakable contract. **This is highly offensive and morally unethical. The intention is not to maximize the earning potential through alternate income sources for land owners, it is purely profit driven by the proponent.**

A potential host signs on the basis they will receive income from an industrial wind turbine.

### **Factors that could change this outcome**

- **26 Response to Submissions – Rye Park Wind Farm**  
*'Depending on final turbine selection, it is possible that not all turbines proposed would be installed to ensure that the project continues to meet all conditions of approval.'*
- **Micro siting**
  - At the CCC meeting when the topic of micro siting was discussed, a couple who are potential hosts seemed quite surprised that they may not end up hosting an industrial wind turbine if it was to be 'micro sited' a 100 metres away onto their neighbours block.
  - Now Trustpower can use their block to travel through without having to provide any financial compensation!

Let's do the sums based on today's dollar figures.

The proponent will earn 1 Large Generation Certificate (LGC) per MWh produced per industrial wind turbine. There is no correlation with consumption demand; it is purely as the wind blows. This is not economically effective to be paying for energy which may not be required at the time and can't be stored for later use. Power generated by industrial wind turbines is a use it or lose it model.

The current SPOT<sup>x</sup> price for a LGC as of 16 June 2016 is \$82.10. Trustpower have stated the project will generate more than 1,028,000 MWh of electricity per year.

1,028,000 / 5000 = 205.6

I'll round off and use 200 as the number of parcels the proponent can cash in per occasion of trade, the remainder can be held over. As the price fluctuates, the proponent will naturally hold certificates to try to maximize the price on each occasion of trade.

200 Parcels x 5000 LGC = 1,000,000

**1,000,000 x \$82.50 (paid per LGC) = \$82,500,000 PER ANNUM**

Now I understand there are associated costs for the Proponent. I can only talk to the forward facing components that are apparent to anyone reading through the RTS once the wind farm is fully operational. **It is worth noting that industrial wind turbines can commence collecting LGCs from the moment they are connected to the grid. SnowTown officially opened Stage 1 2 Nov 2008 yet were receiving RECS from December 2007<sup>xi</sup>. It is not reliant on the entire wind farm being signed off as a complete entity. As a number of different rated power capacity of industrial wind turbines (1.5 MW to 3.5 MW) and model(s)<sup>xii</sup>**

- 12 on-going regional jobs during its operation
- Payments of \$2500 per signed up neighbor agreement within 2kms of the Rye Park Wind Farm
- Payments to involved land owners
- \$272,500 (\$2500 per turbine per annum to the community fund, split across three Local Council areas)

## Page 26 Staging of works

Lack of certainty for locals and ongoing impact. *"construction of the wind turbines may occur in stages or groups over a number of years."*

Map 3.9 pg 31

Roads sealed vs unsealed – inaccurate

Cooks Hill Road and Rye Park Dalton Road shown as sealed in their entirety.

**If details such as these can be misrepresented after many years of so called intensive research carried out by Epuron and now TrustPower, it gives me no confidence as a resident of any of the accuracy within the RTS.**

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The Rye Park Wind Farm proposal in NSW makes no mention of the NSW Draft Wind Farm Guidelines. The Proponent advised at a CCC meeting that since the guidelines have not been ratified, they will not be abiding by them. This is evident by them placing Industrial Wind Turbines (IWT) 157 metres within 2 kms of non involved neighbours resulting in **HIGH Visual Impact.**

By only adhering to the SA Guidelines, the Proponent does so to avoid having to comply with consideration of Infrasound and Low Frequency Noise (ILFN) as identified in the NSW Guidelines.

## Lack of pictorial representation

Trustpower literature relating to Rye Park wind farm all show photos of industrial wind turbines on grassland void of any trees.

- Trustpower Rye Park Wind Farm Newsletter I 12 - August 2015
- Trustpower Rye Park Wind Farm Fact Sheet I 2 - August 2015
- Trustpower Rye Park Wind Farm Newsletter I 13 - May 2016
- Trustpower Rye Park Wind Farm Fact Sheet I 3 - May 2016
- Trustpower Generation Portfolio 2014

Fails to give the reader any indication of what the proposed wind farm would be like.

## Impact on vegetation

Concerning that after removing 17 industrial wind turbines from the proposal (126 reduced to 109) that the total of **vegetation removal has increased by over 20%**. When the landscape in this region is described as heavily felled, I would consider an additional 49 hectares (121 acres) hardly should be described as 'increasing slightly'.

### Revised impact assessment 6.3.2

The primary impact types and the general nature of these impacts remain the same as identified in the original BA. Overall the estimated extent of vegetation clearing has increased slightly – **284.9 ha versus 235.9 ha** originally estimated in the EA.

The aerial view of the proposed Rye Park Wind Farm layout development clearly shows how the layout follows the dense vegetation. This project seems to completely ignore the importance of retaining the remaining vegetation in this region as outlined by such literature as:

- Bush Connect Program – Yass Habitat Linkages<sup>xiii</sup>
- Paddock Trees<sup>xiv</sup>

## Concerns in General

- Proximity of IWTs 119, 120, 122, 124, 125, 127, 128, 129, 130, 131 and 142 to Bango Nature Reserve. This heavily dense bushland is rated High fire danger. This untouched natural landscape provides a habitat for the local fauna and flora. Since moving to my property in 2012, I have witnessed on many occasions Wedge Tail Eagles (WTE) soaring on wind drafts above the Bango Nature Reserve both inside, as the front of my house (3 sets of windows and glass front door) has an uninterrupted view, as well as from outside.

## Fire Management

- 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?

### NSW Rural Fire Service (specific concerns)

- Don't have a standard Operating Procedure (SOP) to deal with wind farm fire management - members of the community have directly asked the RFS in the Yass squad
- No equipment can even remotely reach the turbine nacelle from the ground so should a turbine catch on fire it will just be left to burn – “the Bronto” Aerial Appliance (44 RLX) used by the Emergency Services Agency (ESA)<sup>xv</sup> in ACT can only reach heights of 44 metres
- Aerial fire support – how effective would this be if they have to drop water onto a nacelle fire at least 80 metres up in the air?
  - The wind turbines under consideration have a typical hub height of 80 m – 101 m.
- Select Committee on Wind Turbines – Submission 97<sup>xvi</sup>  
Australian Fire and Emergency Services Authorities Council (afac)  
Wind Farms and Bushfire Operations  
*Disclaimer:*  
*AFAC does not accept any responsibility for the accuracy, completeness or relevance of this document or the information contained in it, or any liability caused directly or indirectly by any error or omission or actions taken by any person in reliance upon it.*
  - 4 Position  
**‘Wind monitoring towers (WMT) associated with wind farm investigations and planning can be very much taller than the planned turbines and can be less visible.’**
  - ‘not expected to present elevated risk to operations compared to other electrical infrastructure.’

Lucky they inserted their disclaimer as how they can say that a WMT of approximately 80 metres is taller than 157 metres and increasing (Bango industrial wind turbines are stated as being 192 metres in height) defies logic. A movable mechanical device containing in the vicinity of 1170 litres of gear oil (Vestas V112 3MW model) not to mention the 3 massive fibreglass blades certainly gives me great cause for alarm in comparison to transmission towers.

- Having reviewed the location of individual Industrial wind turbines in relation to Involved and Non-Involved neighbours, the fact that there are several occasions whereby the turbines and associated infrastructure are of closer proximity to the non-involved neighbours.
- Impacts of Visual Impact assessments and noise are higher for non-involved neighbours than for hosting involved properties.
  - RECOMMENDATION – NSW should ratify their guidelines to state that no non-involved neighbour should have a higher impact assessment than the hosting involved neighbour.
- How many hosting involved neighbours are absentee owners?
- How many hosting involved neighbours are only vacant lands?
- How many hosting involved neighbours do not even reside in the vicinity of the proposed Rye Park Wind and will not therefore be spending the proceeds within the local region?
- **GULLEN RANGE WIND FARM experience**
  - What assurances can the Department provide that there will not be a repeat?
    - Construction traffic using non approved roads
    - Working outside of construction hours without permits
    - Not driving to the conditions – travelling too fast resulting in a number of near misses
    - Non hosts being bullied by construction staff to allow them access through their property
    - Dust from construction impacted sheep property shearing
    - Micro siting

Developer, Goldwind, was forced to lodge a modified development application to the NSW Department of Planning after 69 of its 73 turbines were claimed to be incorrectly located.

    - **Absolute appalling process ensued!**
    - **Worse – the proponent on-sold a 75<sup>xviii</sup>% share of the GRWF whilst proceedings were underway which showed how easily \$2 companies without asset bases could have easily gone into liquidation had the removal of the 9 turbines been upheld!**
    - retrospective modification should not have been permissible after the PAC rejected the original application and originally 9 turbines were identified by the Dept for removal
    - The proponent was forced to buy two impacted properties to make the matter become settled
  - What measures have been put in place to prevent a repeat?
  - Impact on non-involved neighbours within 2kms should surely be a red flag for the Department when Rye Park Wind Farm has 2 residence with a rating of visual Impact

HIGH. The Department even went as far as visiting one of these properties to gain a full appreciation of the impact.

## RTS – RPWF Page 138 8.8 Property Prices

If as the Proponent puts forward there is no cause for concern, why then don't real estate agents use the proposed wind farms as a selling point for potential buyers?

The reports cited in the RTS – RYWF fail to take into account there are two components to identifying property value

- Assessors are required to assess property uniformly
  - This would be the method undertaken by the cited studies
- Appraisers are required to value each property individually
  - This approach takes into account the unique merits and quality of said property

Compare apples with apples. It is redundant to compare a non-involved neighbouring lifestyle property next to a wind farm, with an urban residential 20 kms away. In the case of the proposed Rye Park wind farm, this is the real case. My own property is 15 kms plus from the nearby township of Yass. I have in excess of 100 acres (40 Hectares) and my residence

Peter Reardon's 30 page dossier<sup>xviii</sup> released back in 2013 is more indicative of the immediate impact to properties as it was done on properties local to the region. It is a telling sign that General Electric and AGL want property values excluded from planning guidelines.<sup>xix</sup>

Department of Planning and Community Development (DPCD) understands that approximately 11 dwellings located within 1.5 kilometres of the Waubra wind farm have been vacated with noise cited as the reason. The wind farm proponent has purchased eight of these properties. SLR Acoustic Consultants identified a number of limitations in the Marshall Day Acoustics post construction noise assessment report. These have been communicated to the wind farm operator who has advised you that it has purchased two additional dwellings and made a commitment to operate the wind farm in noise management mode.<sup>xx</sup>

What surety can the Department give me as a citizen of NSW and neighbour within 5 kms of the proposed Rye Park Wind Farm that its noise modelling which theoretically is compliant, is actually compliant post construction?

Further, it is now 2016 so why are they citing studies undertaken in 2009? As everyone is well aware, the property market does not stay static in value nor do potential buyers. Given the number of baby boomers in Australia, it is not unreasonable to think a number would be considering the tree change post retirement. Given the regions close proximity to Canberra, it is attractive in terms of a reduction in price because it is further out than say Murrumbateman which is likely to increase the number of potential 'hobby farm' buyers. It will be a limited number of buyers who would be looking to buy in the region to undertake farming activities as their primary source of income. Tree changes by their very

definition, are looking to escape the city landscape for the ambience of the countryside. I am highly doubtful that any real estate agent is going to tout the beauty of having industrial wind towers, increased transmission lines and collection stations as visual amenities.

As the real estate agent who spoke at the Public Information Night put on by the Rye Park Action Group – Friday 9 October 2015 identified. If a property can't sell that's a problem. Potential buyers are turned off the moment the wind farm is mentioned. Properties in proximity of the Gullen Range Wind Farm have now gotten to the point where real estate agents won't list them because they know they can't get a sale.

At the CCC meeting held 25 May 2016, it was identified that the very members of the CCC committee identified as uninvolved land owners from inception (Meeting 1 held 27 June 2012), blatantly avoided advising the current owners of the proposed Rye Park Wind Farm at any point during the sale of their property. The property identified on the maps as R50, has had its Visual Impact assessed as HIGH. The new owner's first awareness of the proposal came about because of a letter box drop done by a concerned resident (at their own expense). This was at the same time that Epuron had already submitted their EIS and the closure date for submissions was fast drawing to a close.

I'm sure the Department can appreciate the stress of moving for these new home owners now very much exacerbated by the potential of having multiple 157 metre industrial wind turbines erected on their neighbours property towering over their property from the ridge line.

RECOMMENDATION – NSW Government mandate ALL real estate agents and private sellers disclose any and all State Significant Developments are disclosed to potential buyers.

RECOMMENDATION – NSW Government mandate proponents offer to buy out non involved neighbours with a HIGH visual impact rating.

Epuron breached Director General Requirement's when the EIS was first put on exhibition.

*An Environmental Assessment (EA) report was prepared and placed on public exhibition from **2 May 2014 until 4 July 2014.***

101743 Epuron has been asked to for a photomontage to be taken from my property which will occur on <b>Monday 7th July</b> and will further respond once it is made available. The proposed turbines will have a significant visual impact from my property, dominating the skyline and landscape from all areas except the front paddock on the Western boundary.	A photomontage has been provided to the landowners of this residence (R50). The visual impact has been assessed as high. Elevated views extend toward wind turbines on ridgeline and low hills within central portion of the project area.
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## Reliability of computer modelling

Snow Town is Australia's second largest wind generation facility. Trustpower owns both stage 1 and stage 2 of Snow Town Wind farm. Article refers to stage 2 development.

*'Average wind' slashes Trustpower's SA earnings<sup>xxi</sup> Thursday November 19, 2015*



*‘Production would be 9.4 per cent less than previously estimated’ – revised from 985 GWh to 892 GWh.*

*The 270 MW of installed capacity produces an average of 989 GWh of electricity per year<sup>xxii</sup>*

The company, controlled by Infratil, said the revision was due to a number of factors associated with energy yield prediction which included **limitations with modelling tools when applied to a site of such complexity and scale.**

**Continual monetary losses is indicative that none of the proponents will be in a financially viable position to be relied upon to decommission wind farms at the end of their operational life.**

- Pacific Hydro - \$700 m loss
  - Cited reason - Less than expected electricity demand in Australia
- Infigen 2014/15 \$304 m loss
  - Previously known as Babcock & Brown the company went under in 2009
  - Cited reason – wind conditions were anomalously below historical long term average

Continuing change of ownership - \$2 shelf companies

- Rye Park has already changed over from Epuron to Trustpower
- Gullen Range Wind farm – Goldwin sold 75% share to JingNeng<sup>xxiii</sup> while the the modification fiasco was playing out with the Department of Planning and Environment’s PAC.
- Since 2010, Waterloo Wind farm has changed ownership 5 times
  - Hydro Tasmania
  - Roaring Forties
  - TRU Energy
  - Energy Australia
  - Palisade Investment Partners and Northleaf Capital Partners

RECOMMENDATION – To ensure confidence to residents surrounding the proposed Rye Park Wind Farm, the NSW Government should enforce a decommissioning bond from Proponent.

Publication – NSW Farmers – Wind Farm guide for Host landholders

Page 39 – Chapter 10 Decommissioning – 10.3 Developer rights and obligations during decommissioning  
‘A decommissioning bond may be required if the DRP is deemed to be inadequate.

This would ensure the funds are available irrespective of how many times the wind farm changes hands in its 20 – 30 operational lifespan. Has any wind farm in Australia remained under the same ownership since inception?

The recent expose of mines in Queensland<sup>xxiv</sup> leaving costly environmental clean-ups the burden of the state taxpayers should forewarn the NSW government. Ensure this won’t be the effect upon rate payers

in regional areas paying for the decommissioning of wind farms when \$2 shelf companies have no asset base and can't be held to account.

## **Suitability, sensitivity and economic viability to the proposed region**

*Proponents for Rugby Wind Farm proposal Windlab Systems and Repower Australia decided not to proceed when the number of turbines was reduced from 90 to 52 industrial wind turbines. The companies cite 'community consultation, environmental studies and the state governments draft guidelines as the reasons for the reduction.'<sup>xxv</sup>*

The above illustrates that in each instance for wind farms proposed in this region, proponents vastly overstate capacity (number of industrial wind towers) that could reasonably be constructed when abiding by conditions relevant to the site and consideration of neighbouring properties.

## **Increased power prices**

Poles & wires 52% of power bills – 2014 Renewable Energy Target Review  
Keep building transmission lines, keep hiking consumer power bills up.

Stands to reason that SAs increased wind farm infrastructure continues to lift bills AGL (12% increase)<sup>xxvi</sup>, Origin Energy (6.5% increase) and Energy Australia (\$22 increase on the average monthly bill) all effective as of 1 July 2016.

The following report would also indicate the intermittency of wind is also a compounding factor of ever increasing electricity costs to end consumers. As evidenced above, even if consumers shop around energy retailers, they will still incur a price hike.

Surely the South Australian experience should give cause for NSW to ratify it's guidelines, and have a strategic plan outlining how renewable energy is to most effectively be integrated into the grid with due consideration given to the overall economic ramifications.

SA continues to have the highest unemployment rate 6.9% - Energy poverty (choice between heating/cooling the home or eating) is forcing more homes to disconnect from the grid.

2014 AGL company report identified it is bound to pay \$112 per MWh under Power Purchase Agreements (PPA) with wind power generators. These PPA run for at least 15 years and may run for 25 years. Therefore wholesale price drops have no bearing. Even if it did, the cost is simply passed onto consumers. Energy retailers are in the business of making money, they're not a charity!

## DGR not fulfilled

### Visual Impacts - the EA must:

- provide a comprehensive assessment of the landscape character and values and any scenic or significant vistas of the area potentially affected by the project, including an assessment of the significance of landscape values and character in a local and regional context. This should describe community and stakeholder values of the local and regional visual amenity and quality, and perceptions of the project based on surveys and consultation;

Green Bean Design has made no comment of community and stakeholder values of the local and regional visual amenity. Surely at the very least he should have made the effort to talk with the stakeholders within 2km - 2 non-involved neighbouring properties were rated HIGH visual impact and the 13 non associated residential dwellings rated high-medium visual impact. Preferably, he should have also

From the original EIS submitted in 2014

*The landscape values have been considered and determined as a set of professional judgements on the importance to society of the local and regional landscape surrounding the proposed wind farm and are not considered to have the potential to have a significant impact on existing landscape values.*

So one individual urban landscaper is deemed sufficient to be making 'professional judgments on the importance to society of the local and regional landscape surrounding the proposed wind farm' in a region in which he does not reside and to whom residents he did not converse with?

For a more comprehensive response regarding the Visual Assessment of Rye Park Wind farm undertaking by Breen Bean Design – See Attachment 1.

## Health

If there are no concerns to neighbours of wind farms health, then why did AGL write to doctors at 12 clinics across Western Victoria (Hamilton in the north to Portland and Warrnambool in the south) regarding it's Macarthur wind farm. They suggested that anyone presenting to their doctor with symptoms of wind turbine syndrome should be directed by that doctor to visit the AGL Macarthur wind farm website or ring the Macarthur wind farm community engagement team.<sup>xxvii</sup>

## Noise

### **Involved land owners – hosts to 19 industrial wind turbines – give evidence at Senate Inquiry – “The noise was unbearable”<sup>xxviii</sup>**

Clive and Trina Gare are cattle graziers from South Australia's Mid-North with their home property situated between Hallett and Jamestown.

Since October 2010, the Gares have played host to 19, 2.1MW Suzlon s88 turbines, which sit on a range of hills to the West of their stately homestead. Under their contract with AGL they receive around \$200,000 a year; and have pocketed over \$1 million since the deal began.

**COMMONWEALTH OF AUSTRALIA**  
**Proof Committee Hansard**  
**SENATE**  
**SENATE SELECT COMMITTEE ON WIND TURBINES**  
**WEDNESDAY, 10 JUNE 2015**

## **Consideration of new rural LEP**

New Yass Valley Council Rural Lands Local Environmental Plan (LEP) – all land that was zoned rural (80Ha) may be able to be subdivided into building blocks as small as 20Ha and as large as 70Ha.

Perhaps I missed it in the 1200 odd pages of the RTS, but I don't seem to find any specific addressing of the industrial wind turbines and associated infrastructure and their impact on non involved neighbours if they want to consider this option.

## **Paused for Effect**

## **Why is the community fund of \$2500 per turbine for the operational life of the wind farm not indexed for CPI like in the Neighbour Deed?**

Pg 19 - The Neighbour Fee will be subject to CPI Adjustment.

### **14. Rye Park Wind Farm RTS - Appendix G - Draft Decommissioning and Rehabilitation Plan**

#### **1 Introduction**

This plan sets out the decommissioning and rehabilitation works required at the end of the wind farms 30 year operating life and land Lease term.

In 10, 20 and especially 30 year's time, \$2500 will be insignificant.

## **Final thought**

Bottom line, I have personally spent enough hours and days pouring over not just the RTS but a vast amount of literature in order to try to gain an understanding of all the aspects of wind farms. I do so to inform myself as I do not accept what is touted by the 'salesman' pitch of proponents and I want to be able to ensure we are doing this for the right reasons. My research to date concludes for me that Industrial Wind Farms are not the solution. There are cheaper ways to reduce GHG emissions if that is an expectation. There are alternate power generation sources that could help us move away from fossil fuels if that is an expectation. **I do not accept that rural residents should be the accepted collateral damage** for decisions made by faceless individuals typically within government who say they are doing so on behalf of the greater good. When did I, my family and the community become less important as citizens in comparison to our city counterparts? There are better ways and the NSW government has a responsibility and duty of care to all its citizens. Too much attention has been diverted to industrial wind

turbines at the expense of other renewable technology and options. The explosion in the solar PV space for technical improvements, which are driving efficiency, lowering costs and are feasibly able to make use of battery storage seems a much better direction to focus upon.

## References

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iii Rye Park Wind Farm Design Memorandum – Traffic Assessment prepared by Cardno (NSW/ACT) Pty Ltd  
Handed out by Trustpower at a CCC meeting

iii 205 Response to Submissions – Rye Park Wind Farm

Attachment1 –Involved Land Parcels

iv <http://www.environment.nsw.gov.au/resources/climatechange/10948commattwind.pdf>

v AER, The State of the Energy Market 2009

vi Oxford Dictionary

<http://www.oxforddictionaries.com/definition/english/industrial>

vii Transmission Towers

<https://www.sa.gov.au/topics/water-energy-and-environment/electrical-gas-and-plumbing-safety-and-technical-regulation/building-industry/powerline-safety/identifying-powerlines>

viii Acre (AC) = Hectare (ha) \* 2.471

ix <http://www.investopedia.com/terms/b/bait-switch.asp>

x The spot price is for a minimum parcel size of 5000 created certificates.

LGC Spot Price <http://greenmarkets.com.au/resources/lgc-market-prices>

xi [https://en.wikipedia.org/wiki/Snowtown\\_Wind\\_Farm](https://en.wikipedia.org/wiki/Snowtown_Wind_Farm)

xii Page 32 RTS – RPWF 3.4 Wind Turbine Selection

xiii A 10-year project funded by the NSW Environmental Trust through a partnership between the Yass Area Network of Landcare Groups and Greening Australia

xiv <http://www.environment.nsw.gov.au/resources/research/pt=paddock-trees.pdf>

xv <http://esa.gov.au/actfr/about/vehicles-and-equipment/>

xvi Handout at Trustpower Community Open Day held at Rye Park Hall

xvii <http://renewables.seenews.com/news/goldwin-agrees-to-sell-165-5-mw-aussie-wind-scheme-429587>

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xix <http://www.theland.com.au/story/3585603/wind-farms-win-few-fans/#!>

xx The Senate – Speech – 10 December 2013 – Senator John Madigan

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xxii Snow Town Wind Farm

<https://www.trustpower.co.nz/our-assts-and-capability/power-generation/snowtown>

xxiii <http://www.gullenrangewindfarm.com/about-us/>

xxiv <http://statements.qld.gov.au/statement/2016/3/15/government-moves-to-enforce-chain-of-responsibility-system-for-costly-environmental-cleanups>

xxv <https://yes2renewables.org/2012/05/04/rugby-wind-farm-has-the-noisy-minority-won-out-at-the-regions-expense/>

xxvi <http://www.heraldsun.com.au/news/national/agl-and-origin-both-set-to-hike-electricity-bill-prices/news-story/cba25039b4f2847289434fb0611b78a0>

xxvii The Senate – Speech – 17 March 2014 – Senator John Madigan

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