



HILLS OF GOLD PRESERVATION INC.
87 JENKINS STREET NUNDLE NSW 2340

August 22, 2018

To whom it may concern,

Hills of Gold Preservation Inc understands that Infigen has applied to the Department of Planning and Environment for a Modification 4 to its Flyers Creek Wind Farm, approved on March 2014.

Hills of Gold Preservation Inc objects to the modification proposing the following increases:

Maximum height from 150m to 160m to blade tip
Turbine capacity of 2 and 3.6MW to 4.2MW
Blade length from up to 56m to up to 70m
Rotor diameter up to 112 to up to 140m
Turbine footings from 12m x 12m to 19 x 19m

The proposed modification to increase the wind farm envelope will raise the capacity, (and consequently income of the wind farm) by 15-20%, while further reducing landholders' enjoyment of their homes and exacerbating environmental impacts.

The EIS does not assess the impact of movement on landholders' enjoyment of their homes. One of the key attractions of choosing to invest in an area of rural character is the stillness. While the EIS addresses shadow flicker, noise and visual impact, it does not acknowledge the annoyance caused by movement, where previously there was none.

In addition, the Department of Planning and Environment guarantees for decommissioning are unsatisfactory. It is recognised that if the wind farm owner becomes insolvent, decommissioning liability falls to the landholder. Given that the cost of decommissioning is likely to be more than the turbine income, the community needs surety that decommissioning funds are quarantined before project construction begins.

Since the March 2014 approval of Flyers Creek Wind Farm important health information has come to light regarding annoyance as a pathway to illness. The most significant recent Australian assessment of noise/health issues is that published by the Federal Administrative Appeals Tribunal (December 2017). It made important findings on wind farm noise and health impacts, including:

- Annoyance from wind farm emissions is common in Australia and overseas.

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- A significant proportion of wind farm noise is in the low frequency range.
- Humans are more sensitive to low frequency sound, and it can therefore cause greater annoyance than higher frequency sound.
- Even if it is not audible, low frequency noise and infrasound may have other effects on the human body, which are not mediated by hearing but also not fully understood.
- Noise measurement using dB(A) is an inadequate measure of relevant wind farm noise; and wind farm noise measurement should not average noise over time and frequencies.
- Wind farm low frequency noise can be greater indoors than outdoors at a dwelling.
- There is as yet no properly established “dose-response” curve which applies to wind farm noise which can be used by policy makers to set appropriate limits on wind farm sound emissions.
- Some wind farms create noise annoyance for members of the community and that there is a well established pathway from annoyance to adverse health outcomes.

Furthermore, the National Health and Medical Research Council has awarded \$3.3 million to two research projects: Flinders University of South Australia exploring relationships between noise from wind farms and effects such as annoyances and reduced sleep and quality of life; and University of New South Wales investigating the broader social and environmental circumstances influencing the health of people living near wind farms.

Hills of Gold Preservation Inc rejects the assessment that increasing the envelope of Flyers Creek Wind Farm will not significantly impact on neighbouring residents, and objects to the approval of Mod 4.

Yours sincerely

Megan Trousdale
Hills of Gold Preservation Inc
Communication Sub-committee