

## 2. EXECUTIVE SUMMARY

The Flyers Creek Wind Turbine Awareness Group has examined the Environmental Assessment presented by Infigen Energy concerning the Flyers Creek Wind Farm Proposal. The following objections are listed:

ISSUES	OBJECTIONS
<b>Justification of Project</b>	<ol style="list-style-type: none"><li>1. Should the NSW Government, via their agent the Department of Planning and Infrastructure approve the Flyers Creek Wind Farm it will be disregarding its <b>duty of care</b> to the residents in proximity to this industrial wind turbine complex.</li><li>2. Should the NSW Government, via their agent the Department of Planning and Infrastructure approve the Flyers Creek Wind Farm is will ignoring <b>the precautionary principle</b> particularly in relation to health, welfare and community affairs as recommended by the Federal Senate Inquiry into Rural Wind Farms.</li><li>3. The NSW Government must:<ul style="list-style-type: none"><li>• Declare a moratorium on the construction of wind turbines until appropriate research has been carried out to assess all health effects;</li><li>• Be mindful of the recent appeal before the South Australian Supreme Court which was upheld on the basis of non compliant noise. This action must determine the adequacy of the SA EPA Noise Guidelines which NSW also uses.</li></ul></li><li>4. The proposal for the FCWF must be rejected:<ul style="list-style-type: none"><li>• Wind turbine generated electricity is inefficient, uneconomic, and intermittent and does not create a net saving in CO<sub>2</sub> emissions.</li><li>• Issues of equity where one landholder obtains an income at the expense of a neighbour.</li><li>• Issues of equity where one landholder destroys or significantly impacts the “quiet enjoyment”, “rest and repose” and visual amenity of a neighbour.</li><li>• Industrial Wind sites destroy “Rurality” and are therefore contrary to residents natural and deliberate geographic and locality choice of abode.</li></ul></li></ol>

	<ul style="list-style-type: none"> <li>• There has been no consideration of the effects of noise on school children (one school 1.5 km away), the elderly and the disabled, all groups in the community with increased susceptibility.</li> <li>• <b>Reduced land values for both host and non-host landholders alike.</b></li> <li>• There is legislative confusion, lack of structure and no proper mechanism to deal with complaints about noise. No Government Authority (including local government, EPA or Department of Planning) appears to take <b>responsibility for the noise compliance of the energy company's operation.</b> Noise complaints are referred back to the energy company. This needs to be addressed as a matter of urgency.</li> </ul>
<b>Community Consultation</b>	<ol style="list-style-type: none"> <li>1. The community consultative process has been extremely inadequate, and there has been a lack of detailed information available from Infigen Energy.</li> <li>2. The proponent has failed to engage with the community and has fostered division within the community.</li> <li>3. There has been a tendency to claim other organisations' meetings, minor newspaper articles and other media items as part of the community consultation. Often these have not been relevant to the FCWF proposal.</li> <li>4. From a face-to-face point of view there has been a lack of respect, and a dismissive attitude by Infigen to many district residents, particularly if they reflect an opposing view to the FCWF.</li> </ol>
<b>Noise Impacts &amp; Health Implications</b>	<ol style="list-style-type: none"> <li>1. Aurecon (Infigen's environmental consultant) has used the GE2.5x1-2.5 MW wind turbine to model noise impacts which significantly "under-represents" the eventual model that will be used, introducing significant sources of errors. <b>The Director General should refuse the FCWF proposal on these grounds alone.</b></li> <li>2. The measurement of background sound and the modelling of noise impact of the proposed FCWF is flawed and inaccurate.</li> </ol>

	<p>3. There is no measurement of prediction of <i>tonality</i>.</p> <p>4. Monitoring of sound at Capitol Wind Farm by The Acoustic Group has found non-compliance of audible sound levels, and significant levels of infrasound also above allowable levels. This work casts into doubt the ability of wind turbines operated at Flyers Creek to be able to comply in any way with acceptable and regulated levels of noise. <b>The Director General should refuse the FCWF proposal on these grounds.</b></p> <p>5. The matter of noise guidelines and measurement, tonality and other issues are currently being examined by the South Australian courts and <b>no decision regarding the FCWF proposal should be contemplated until these matters are determined.</b></p> <p>6. Effective monitoring and compliance regimes must be imposed by the planning authority at the outset. None are proposed or contained in the Flyers Creek Environmental Assessment and it should not be approved on this basis.</p>
<b>Visual Impacts</b>	<p>1. The wind turbines will dominate, scar and industrialise the landscape.</p> <p>2. The wind turbines will degrade the scenic qualities of the rural landscape in which residents have chosen to live, completely altering the visual environment and alienating residents whose rights to the quiet enjoyment of their property have been usurped.</p> <p>3. There will be cumulative visual effects both locally and within the shire where Blayney Wind Farm, Cadia Valley Operations (Newcrest Mining), and other projected wind farms and mines will effectively create a massive industrial rural landscape.</p> <p>4. The report on flicker produced by Parsons Brinckerhoff Australia inadequately predicts the effects of flicker on affected residences and does not address the possible effects on people/children with epilepsy or autism.</p> <p>5. The substation is poorly located and visually impacts at least one residence.</p>

<p><b>Flora and Fauna</b></p>	<ol style="list-style-type: none"> <li>1. No <b>Soil and Water Management Plan</b> for either the construction or the operational phase of the project is presented as part of the Environmental Assessment. Leaving this plan to be developed as part of the Conditions of Consent has meant that there can be no public comment on this important aspect.</li> <li>2. No <b>Construction Environmental Management Plan</b> (to include detailed design of site access points, tracks, underground cables etc) has been presented in the Environmental Assessment. The EA states that this will be developed in consultation with an ecologist. Again it appears that this plan will be developed as part of the Conditions of Consent and again there is no opportunity for public comment. It is assumed, but is not clear, that the Soil and Water Management Plan differs from the Construction Environmental Management Plan.</li> <li>3. Deficiencies in the flora survey: The EA states that the exact loss of trees <b>cannot be quantified</b> at this time as the location of the infrastructure, particularly tracks and cable routes, has not been finalised. Why has the EA been presented for public comment without this important aspect of the plan described? How can a determination be made on the FCWF proposal without specific details in place?</li> <li>4. The Environmental Assessment does not make adequate provision for the preservation of tree hollows which are critical for parrot breeding, specifically important in the Flyers Creek area for the vulnerable <b>superb parrot</b> and <b>turquoise parrot</b>.</li> <li>5. The presence of <b>raptors</b> – in particular the protected Wedge-tailed eagle – is noted and a plan for minimisation of collision mortality is proffered. This is inadequate.</li> <li>6. Micro bats are very important to the ecology of the area which accommodates two vulnerable species (only one surveyed). Micro bats are susceptible to fatal barotrauma. The Environmental Assessment makes no mention of this and there are no plans suggested to mitigate this.</li> <li>7. There does not appear to be any assessment of the effect of the transmission line through the Canobolas State Forest on flora and fauna as required by the DGRs.</li> <li>8. There is some consideration of the impact of the project on birds</li> </ol>
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	<p>and bats from blade strikes, low air pressure zones at the blade tips, and alteration to movement patterns resulting from the turbines and transmission lines. But the demonstration of how the project has been sited to avoid and/or minimise such impacts is sketchy, and apparently details will be decided later. FCWTAG do not believe the DGRs are adequately met.</p>
<b>Water</b>	<ol style="list-style-type: none"> <li>1. The water studies in the Environmental Assessment are not substantial and there has been little attention to water supply, surface flows and ground water.</li> <li>2. Protection of the water via surface flows, in the event of an oil spill or other accident with hazardous material, is not detailed sufficiently.</li> <li>3. The site water demand takes no account of water required in the event of fire.</li> <li>4. There is no assessment of the leaching of heavy metals, and other components, from the concrete footing over the life span of the wind turbine, or of the decades following.</li> </ol>
<b>Traffic and Transport</b>	<ol style="list-style-type: none"> <li>1. There is no <b>Transport</b> and/or <b>Traffic Management Plan</b> in place, and provided for public scrutiny as part of the Environmental Assessment.</li> <li>2. Similarly there is no <b>Construction Environmental Management Plan</b> in place.</li> <li>3. There is insufficient detail about the rectification, maintenance and upgrade of local Council roads to be meaningful.</li> <li>4. There is insufficient detail about the upgrading, construction and maintenance of farm access tracks and how they will meet environmental standards.</li> <li>5. Blayney Shire Council has responsibilities in the area of shire roads, waste and ratepayer amenity. Questions of critical interest to the welfare of Blayney residents and ratepayers are unanswered.</li> <li>6. Blayney shire residents' public interest is not met.</li> </ol>

<b>Indigenous and Cultural Heritage</b>	<ol style="list-style-type: none"> <li>1. The assessment of Aboriginal cultural heritage is superficial and has dismissed requests by Aboriginal stakeholders for further surveys as not necessary.</li> <li>2. The assessment of the non-Aboriginal cultural heritage has also been dismissed as irrelevant and of no significance ignoring the fact that the pastoral history, and associated historic villages and buildings form a vital part of the district's cultural and built past.</li> </ol>
<b>Cumulative Impacts</b>	<ol style="list-style-type: none"> <li>1. The environmental assessment (EA) for the Flyers Creek Wind Farm has significantly failed to properly address the cumulative impact of the Flyers Creek Wind Farm with other industrial activity currently taking place within the immediate Flyers Creek district, namely:</li> <li>2. Cadia Valley Operations (Newcrest) gold and copper mine adjacent to the proposed wind farm, and</li> <li>3. Blayney Wind Farm situated 8 kilometres from the proposed wind farm.</li> <li>4. Other industries also add to the cumulative impact of industrialisation, making the addition of the proposed FCWF a significant deterrent to new residents seeking a rural lifestyle and associated tranquillity.</li> </ol>
<b>Hazards and Risks</b>	<ol style="list-style-type: none"> <li>1. The FCWF will interfere with aerial agricultural operations.</li> <li>2. The FCWF will interfere with local aviation businesses and clubs.</li> <li>3. Consultation with CASA and the matter of obstacle lights has <b>not</b> been dealt with adequately in the EA.</li> <li>4 The impact of the proposed extension to the Orange Aerodrome has <b>not</b> been addressed in the EA, and the resultant changes in the Obstacle Limitation Surface OLS).</li> <li>5 The impact of the proposed extension of Orange Aerodrome and future local radar requirements has <b>not</b> been addressed in the EA.</li> <li>6 The ability for aerial fire fighting close to the wind turbines, and probably also land based fire fighting, is compromised with dangerous consequences.</li> </ol>

	<p>7 49 residences are within the safety 2 km limit to the closest wind turbine recommended for <b>blade failure</b>.</p> <p>8 The fire management plan is not formulated and is not part of the EA for public comment. Despite a small list of management options in the event of a fire in one of the turbines there is the risk of catastrophic sequelae to such a fire in a bush fire prone area.</p> <p>9 There is no evacuation plan for Errowanbang Public School in the EA in the event of a bush fire. There is restricted fire fighting capabilities due to distance and availability of the Rural Fire Service.</p> <p>10 There is no description of exactly what mitigating techniques will be used in the event of <b>digital television reception failure</b>, nor who will be responsible for any rectification.</p> <p>11 Future geophysical exploration and mining is compromised.</p> <p>12 Accident mitigation is not adequately described.</p>
<b>Decommissioning And Waste Management</b>	<p>1. The arrangements for decommissioning as set out in the Environmental Assessment are inadequate and provide both the host and the community with little security to ensure the timely decommissioning and removal of the wind turbines at the end of their useful life.</p> <p>2. The argument for a decommissioning bond is dismissed by Infigen as unnecessary whereas research shows this is the only security available to the community. <b>The DGRs are not met.</b></p> <p>3. There is insufficient information provided in the EA concerning waste management in any of the construction, operation or decommissioning phases.</p>