

Ms Tania Neill
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29th August 2017

Mr Tim Stuckey
Planning Officer
Resource & Energy Assessments/Planning Services
NSW Government Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Email: tim.stuckey@planning.nsw.gov.au

Dear Tim,

Re: Modification Request Number 4 for the Glen Innes Wind Farm

Attached is my preliminary submission of 6 pages in relation to the Modification Request Number 4 for the Glen Innes Wind Farm.

Would you please confirm by return email to ["tneill62@gmail.com"](mailto:tneill62@gmail.com) that you have received the submission.

Yours faithfully
Tania Neill

SUBMISSION IN RELATION TO MODIFICATION REQUEST NO.4 BY THE GLEN INNES WIND FARM

Glen Innes Wind Farm Modification 4 requests approval for:

- Increasing the rotor tip height to 180m,
- Increasing the turbine blade length to 65.8m,
- Increasing the width of the access tracks to 12mtrs, and
- Changing the location of some turbine sites.

Glen Innes Wind Farm Modification 4 Request should not be approved for the following reasons:

Approval Expiry and Construction

1. As construction of the Glen Innes Wind Farm (GIWF) has not commenced the approval for the GIWF has lapsed. Accordingly, the Department of Planning and Environment (Department) has no authority to consider the Modification 4 request.
2. The GIWF was approved in October 2009. Nothing has occurred in the 8 years from the original approval date viz: no construction work has been completed or financial commitments entered into:
 - Construction of the wind farm has not commenced.
 - No wind turbines have been ordered.
 - A Transmission Connection Agreement has not been entered into with Trans Grid
 - No Electricity Supply and Purchase Agreements have been entered into, and
 - No evidence has been provided that the developer has finance for the project.

Accordingly, Modification 4 should not be approved.

3. According to the management of the GIWF the project achieved “commencement” of construction by completing some geo technical investigation. In my view this does not constitute construction. It is my understanding that the definition of construction specifically excludes geo technical drilling.
4. Eight years is more than enough time for anyone to comply with, and execute/complete, their project approval – certainty is required in the local area that the GIWF is not proceeding.
5. During this 8 year time period the White Rock Wind Farm (WRWF) and the Sapphire Wind Farm (SWF) have received approval and have commenced construction (in accordance with the general acceptance of what construction is). Also, the WRWF is already producing power.

Visual Impact

6. The Visual Impact Report prepared by Green Bean Design (GBD) was a “desktop study” with no site visit noted. Without a sight visit, and genuine discussions with each affected resident (which has not occurred) within the 3.6klm boundary (as per figure 1 in the GBD report), how can valid conclusions be drawn about the visual impacts on each property.
7. As per GBD the Modification 4 request by GIWF seeks consent for:
 - A hub height increase of 21 metres from 89m to 110m – a 24% increase.
 - A rotor diameter increase of 18 metres from 122m to 140m – a 15% increase.
 - A tip height increase of 30 metres from 150m to 180m – a 20% increase.
 - A sweep area increase of 3434 sq metres from 11960 sq metres to 15394 sq metres - a 32% increase.

This is a significant increase in visual impact and will have a substantial impact on residences within 3.6klm. How can GBD conclude that this substantial area/visual increase is not a significant change, but rather a minor amendment is beyond me.

8. GBD’s Figure 1 in their report is inaccurate as at least the following buildings are not included on it:
 - Two additional houses at Furracabad Station (both occupied full time),
 - One additional cottage at Green Valley: Green Valley B,
 - Two additional residences at Waterloo Station: Waterloo B and Waterloo C both of which are occupied full time,
 - Matheson Church, and
 - Steven Lynn’s residence.

As no assessment was completed for these residences / church the GBD report is defective and should be disregarded.

9. The GIWF Modification 2 submission listed the visual impacts of the turbines as “Moderate to High”. Despite a substantial increase in the scale of the wind turbines (refer point 7 above), GBD’s report lists the visual impact changes of the Modification 4 request as “Low”. I do not agree with this conclusion of GBD as it is at odds with the comments in GBD’s own report.

A 24%, 15%, 20% and 32% increase in the scale of the wind turbines in Modification 4 would clearly move residences rated as “Moderate in Modification 2” into “High” and those rated as “High in Modification 2” into “Extreme”.

10. The GIWF Modification 4 request will have Immense Additional Visual Impacts, and when combined with the visual impacts from the much larger WRWF and SWF wind farms, will have a significant impact on the picturesque rural setting of the local area.
- GIWF management is very aware that one of the main reasons for the strong opposition to the wind farm by the local community and residents within close proximity is the significant adverse visual impact caused by the turbines – this gets much worse with Modification 4.
11. The GBD report offers no conclusive measures to remedy the high visual impact that the wind turbines will have on residences within 3.6klms of the GIWF.
- The measures put forward previously by the GIWF to remedy the adverse visual impacts for residences from the wind turbines, and approved by the Department, was “additional tree plantings”. GBD in their report quite rightly conclude that additional tree planting is not a practical option to mitigate the adverse visual impact. It would appear that the Department and residences within 3.6klms of the wind turbines have been misled in the past.
12. The Visual Assessment does not adequately address the cumulative visual impacts arising from the adjacent WRWF and SWF on residences in close proximity to the GIWF.
13. The GBD report offers no genuine mitigation measures for the high visual impact that the wind turbines will have on at least 23 dwellings within 3.6klm of the Wind Farm. The wind turbines are in complete contrast to the surrounding countryside and environment.
14. The Environmental Assessment ignores the residential rights of properties in close proximity to the GIWF all of which have a “Moderate” or “High” visual impact. Residential rights must be taken into account.
15. This is the second modification request to increase the size of the turbines for the GIWF. When considered together these two modification requests increase the sweep area by 96%, hub height by 37.5%, rotor diameter by 40% and tower height by 38.5% - a massive increase in visual impact effect.

	Original Approval	Modification 4 Request	
Hub Height	80m	110m	37.5% increase
Blade Tip Height	130m	180m	38.5 increase
Rotor Diameter	100m	140m	40% increase
Rotor Sweep Area	7857 sq metres	15394 sq metres	96% increase

16. The original Development Approval assessed the visual impact on 14 residences as “High”. It is illogical that residences rated as “High” and those rated as less than “High” in the original approval have not been further impacted by an increase in sweep area of 96%, hub height by 37.5%, rotor diameter by 40% and tower height of 38.5%.

17. The visual assessment by GBD should not have been the incremental effect from Modification 2 to Modification 4, but rather the change in visual effect from the original Development Approval to Modification 4 (refer to table in point 18 above). Accordingly, the GBD report is not relevant and should not be considered.
18. The GBD report indicates that no site visit was made. How can a consultant properly assess the Visual Impacts of the GIWF on each residence if you haven't been there and had genuine discussions with the affected parties. Also the WRWF and SWF are currently under construction and they are having a significant visual impact in the area. The cumulative impacts of the WRWF and SWF must be addressed.

Noise

19. The Noise Assessment does not account for the cumulative noise impacts from the other two wind farms in the area viz: WRWF and SWF.
Since the GIWF was approved both the WRWF and SWF have been approved and are under construction – a part of the WRWF is currently operating.
As construction of the GIWF has not commenced the noise assessment must now account for the cumulative impact of the other two wind farms in the area.
20. Noise, as well as visual impact, is now a significant issue in the Matheson Valley with the construction and now partial operation of the WRWF. It is understood that the level of protests from residents has increased markedly since operations have commenced to the point that WRWF has now offered compensation to some residences for their noise/visual impact concerns. This shows above anything else that noise/visual impact is a significant issue for residences in close proximity to wind farms and this will only get worse with the compounded effect of the GIWF.

Consultation

21. As per the Department's Guidelines, wind turbines which are within 2klm of non associated residential dwellings should be removed or relocated so that they are not within 2klm of these dwellings.
22. Consultation within non-associated residential dwellings in close proximity to the GIWF did not take place which is a breach of GIWF Conditions of Approval and the Department's Wind Farm Guidelines.

23. The NSW Wind Farm guidelines require that Wind Farm proponents must undertake a comprehensive and genuine community consultation and engagement process.

The applicant must demonstrate in the environment assessment that effective consultation has occurred prior to the lodgement of the application and that issues raised as a result have been addressed in the Assessment. Without this being adequately demonstrated, the application will not be accepted.

GIWF have not consulted residences in close proximity to the GIWF in relation to this modification request.

Accordingly, the Department has no option but to refuse the modification request.

Other

24. Any need for the GIWF 25 turbines has substantially diminished with the approval and commencement of construction of the 119 turbine White Rock Wind Farm and 75 turbine Sapphire Wind Farm. In addition, solar farms are planned for both the WRWF and SWF.
25. Senvion are the proposed wind turbine supplier and principal contractor for the GIWF. The Shadow Flicker report was prepared by Senvion. Senvion, in preparing the Shadow Flicker Report, have a massive conflict of interest. Accordingly, this report should be ignored and disregarded.
26. In previous environmental assessments consultants Aurecon have acknowledged that the area of the GIWF is a “low wind site”.
27. The increase in access track width will cause additional environmental damage and wildlife habitat fragmentation resulting in increased risk to animal and bird life – especially threatened species.
28. There is no doubt that the development of the wind farm will have a significant negative effect on property values.
29. The GIWF does not have the support of the Glen Innes Severn Council as the Development Approval does not comply with the Council’s DCP for Wind Farms.
30. The Modification 4 request does not comply with the requirements of the December 2011 NSW Planning Guidelines Wind Farms, in particular the 2klm setback and community consultation.
31. The GIWF does not have strong community support as attested by the petition of over 600 signatures objecting to the wind farm tabled in the NSW Parliament.

32. The Department does not have the power to amend the turbine sites from those approved by the Court.
33. This modification request has not been prepared and assessed against all of the requirements of the NSW Planning Guidelines Wind Farms 2011. Such a comparison will highlight serious deficiencies in the Environment Assessment prepared by Environment Property Services.