

Response to Modification 4 – Glen Innes Wind Farm

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The proposal to further modify the Glen Innes Wind Farm Proposal poses some very important questions that the Department of Planning must address:

1. Is the Department satisfied that the project approval has not lapsed, given that the project has not commenced construction and is relying on some geotechnical drilling to meet the requirements of physical commencement by 31 January 2017? Is the department confident that this decision would be upheld under legal challenge?
2. Has the Environmental Assessment adequately assessed the Modification to the project, in terms of cumulative environmental impacts as at 2017, and also in terms of assessing against the Wind Energy Assessment – Visual Assessment Bulletin (December 2016)?
3. Why is a project which has failed to be constructed since its approval in 2009 allowed to seek further modification, when two significant wind farms have commenced construction in the local area?
4. Is the department satisfied that the continuing impact on local communities and rural industries can be justified against a project that has failed to commence and has made very limited progress in the past 8 years?
5. Is the Department satisfied that the impacts on the heritage values of the local area have been adequately assessed?

This submission **strongly opposes** the Glen Innes Wind Farm Modification 4 on the following grounds:

1. Need for the project

The Glen Innes Wind Farm project was first approved in October 2009. Construction has not commenced during the last 8 years since approval. The project only achieved “commencement” under Condition 1.5 of their Consolidated Development Consent by completing geotechnical investigations, which does not constitute construction. This was confirmed in an email from the Department of Planning 17th February 2017 (attached), where... the definition of “construction” under the project approval specifically excludes “geotechnical drilling”. The project has therefore failed to start construction 8 years after first approval. Any demonstrated need for this windfarm of 25 turbines has diminished with the approval and commencement of construction of the White Rock windfarm (119 Turbines when completed) and the Sapphire wind farm (75 turbines when completed). In addition solar farms are planned for both the White Rock and Sapphire sites. The marginal contribution of the Glen Innes Wind Farm to this infrastructure is small and as is demonstrated below, comes with some serious problems.

The need for the project therefore may no longer be viable. Modification 4 proposes supplying 90 MW into the NSW grid and the environmental assessment completed by Environmental Property Services, does not adequately address the need for the project. The economics of additional expenditure on generation is doubtful with the operation of decentralised generation in the two wind farms currently under construction.

The electricity generated by the Glen Innes Wind Farm will have to be dispatched to customers on the Qld- NSW Interconnect or the 132 kV line which runs from Glen Innes to Inverell operated by TransGrid. No evidence has been provided which demonstrates that a Transmission Connection Agreement with TransGrid can be successfully negotiated. In the event a transmission connection agreement then there is no demonstrated need for the project, as there is no way of getting the electricity to customers - without additional expenditure on infrastructure.

The lack of any activity on this project has had knock on effects to the local area. At Waterloo Station, significant capital investments have been delayed pending the outcome of this proposal. The project is impacting on the primary land use of the local area, being primary production. If the project has failed to be constructed 8 years after approval, and is impacting other land uses in the area, the Department of Planning needs to act on withdrawing this approval entirely.

2. Visual impact

The study completed by Green Bean Design was detailed as a desktop study, with no site visit noted. The result is a visual assessment study which has clear deficiencies as outlined below. It is important to note that a 27% overall increase in the project scale is a significant change. The Environmental Assessment does not address this as a significant change, rather a minor amendment.

The Green Bean Design Report notes that *“This VIA also included a visual assessment of an additional twelve residential dwellings identified between 3km and 3.6km from the approved GIWF Mod-2 wind turbines”*. Visual impact assessment has not been accurately extended to 3.6 Km for the following reasons:

- Change does not appropriately account for Waterloo Station Homestead. The assessment does adequately assess the visual impacts on the homestead, which has a direct line of sight to the majority of wind turbines associated with the project. The mapping of visual impact in Figure 3 of the Green Bean Design report is inaccurate. The view from Waterloo Station Homestead will have view of greater than 6-10 turbines tips.
- Waterloo Station also has two other full time occupied residences, which are not mapped. Therefore Waterloo A, Waterloo B, and Waterloo C should be assessed, in accordance with other properties with multiple dwellings noted in the report.
- No wireframe model has been completed for the view from Waterloo Station despite being classified as a Level 1 viewer sensitivity rating. Waterloo Station Homestead will have views of both Glen Innes Wind Farm, and White Rock Wind Farm.
- Matheson Church: The views from this building has not been taken into account, despite having local significance to the community.
- Glen Innes Wind Farm Modification 2 listed visual impacts of the project as “Moderate to High”. Despite a 27% increase in the scale of the project, the report lists the visual impact change as “Low”. The project will have immense visual impacts, and combined with the impacts from White Rock Wind Farm and Sapphire Wind Farm, will have a significant impacts on the picturesque rural setting of the area.

3. Heritage

With reference to the Wind Energy Assessment – Visual Assessment Bulletin (December 2016). Table 5, (Page 30) of the Viewer Sensitivity Level Classification classes - Any buildings, historic rural homesteads/ residences on the State or local Government Heritage are classed as a Level 1 viewer sensitivity rating. While noting that the property has “Local Heritage Listing”. the Green Bean Design report fails to detail that Waterloo Station has been recorded and approved on the National Trust of Australia Register since 11/2/1974, of which a copy of the register listing is attached.

The assessment provides the following inadequate assessment of the Waterloo Station Homestead, and mitigation measures.

The dwelling is located around 770 metres north of the Gwydir Highway corridor within a parkland type setting. Mature tree planting flanks the driveway access from Waterloo Road and is scattered to the west and north of the dwelling. Views south east toward the approved GIWF Mod-2 (and proposed Mod-4) wind turbines are generally open and extend to wind turbines around 7 kilometers from the dwelling. Whilst there is some potential for visual mitigation through tree planting, this would have a likely undesired effect of foreshortening views and indirectly impacting the heritage values associated with the property.

In reading the above, the report offers no conclusive mitigation measures for the high visual impact that the wind turbines will have on Waterloo Station. The wind turbines are in complete contrast to the historic character generated by the homestead, shearing shed, shearers quarters and the Matheson church.

4. Noise

The noise assessment does not account for any cumulative impacts from the other two wind farms which are currently under construction in the area. Two wind farms, Sapphire and White Rock have been approved in the area and are under construction. As Glen Innes Windfarm has failed to commence construction, the noise assessment must account for the cumulative impacts of other developments in the area.

Noise is a significant issue in the Matheson Valley with the construction and now operation of the White Rock Wind Farm. It is understood that the level of protests from residents has increased markedly since operations have commenced to the point that White Rock Wind Farm has now offered compensation to some residents for the noise. This shows above anything else that noise is a significant issue and will get worse with the compounded effect of Glen Innes Wind Farm.