

Rye Park wind farm Modification 1 is not in the public interest.

Section 4.15 (1) of the EPA Act 1979 list the factors the determining body should consider in the Determination process.

In addition to the obvious, eg

the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality, and;

the suitability of the site for the development, and;

any submissions made in accordance with this Act or the regulations,

The final matter on a short list is:

(e) the public interest

The public interest figured prominently in the PAC determination of the Rye Park wind farm (as it does in the Wind Energy Guideline and the Visual Assessment Bulletin).

In the Rye Park wind farm determination, it was the balancing factor that tipped the PAC decision to approval.

Given that, how can a modification:

Where the justifications for the modification are mostly to the benefit of the developer and their contractors, rather than the public

That greatly increases the visual impact of the wind farm through the increase in turbine height and the increase in both turbine and overall wind farm swept area (71% and 49% respectively - to put that in perspective, the **increase** in swept area of **one** Rye Park turbine approaches the **total** swept area of **all** turbines in the Crookwell wind farm, also owned by TILT)

Where this same increase in swept area will, logically, have a corresponding increase in bird and bat trauma.

That increases noise impacts to the level where a curtailment regime will have to be introduced in order to ensure the noise from the wind farm achieves the criteria at all residences and under all wind speeds. The curtailment regime involves operating selected turbines in a noise reduced mode at the wind speeds where the predictions indicate that the criteria will be exceeded.

Which massively increases the concrete foundation size from 350 cubic metres to 800 cubic metres. (All of this reinforced concrete will remain forever in the ground due to an up-front pro-developer ruling by the Department of Planning)

Whose longer blades will have a direct negative environmental impact on the transport solution. TILT estimates that the vegetative clearance required for the chosen road route approaches 40 ha.

No estimate was apparently given in the initial approval!

I remind the Department that the bitterly fought Crudine Ridge Modification 1, involved the clearance along Aarons Pass Rd of an **additional** 5.05 ha to the approved 1.54ha

Where the vegetative clearance required for the “Indicative Development Footprint – wind farm”, has more than doubled, with the increase alone being 285.3 ha

That increases the impact on Aboriginal Cultural Heritage

Where the justification for wind farms, especially in NSW has plummeted as the renewables industry switched to solar. This year alone, SEARs have been issued to 7 new solar farms¹ and in comparison, 2 new wind farms². Last year the comparison was just as stark.

Where recent research into infrasound and tonality and their impact on health increasingly come down in opposition to wind farms, especially those that have larger turbines.

Being evaluated when the corona-virus has taught us not to have our important industries in the hands of foreigners, even Kiwis

When the output from the currently approved wind farm is no longer required, given the coming depression, and from the modification even less so.

Whereby numerous other impacts such Electromagnetic Interference, Aviation, Property Values, Bushfire Danger and Shadow Flicker have increased solely due to this modification,

still be considered in the public interest?

I look forward to the proponent’s justification for the project remaining in the public interest and the Department’s comprehensive explanation in support, or otherwise, of the proponent’s arguments.

¹ Middlebrook, Whittingham, Stubbo, Dunedoo, Dumaresq, Yass, Yarren Hut

² Hills of Gold, Elysian