

Planning and Assessment
Department of Planning, Industry and Environment
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2nd June 2020

RE: Rye Park Wind Farm Mod 1 (SSD-6693 Mod 1) Tip Height Increase

The Rye Park Action Group is a group of residents from the locality of Rye Park who are concerned about the Environmental, Social and Emotional impacts that will result if Modification to the Rye Park Wind development (RPWF) is approved. Our group comprises of farmers and townsfolk, both newcomers and multigenerational landowners, who reside and/or work within the footprint of the RPWF.

The greatest concern our members have is the increase in visual impacts, being an increase of 27% in turbine height but an increase of 71% in rotor sweep area. Although the total number has been reduced this will be negated by the increase to 200m in height.

Whilst the proponent is claiming a reduction in visual impact overall, we challenge this notion, as the project is never looked at in its entirety, but from sites along its 35km length and the impact of the towers must be considered at each individual site. Therefore, the visual impact increases between 27% (height) and 71%(RSA) at any one site.

As the land clearing and ridgeline leveling required to create the platforms for each turbine and the accompanying crane pad, further increases the visual impact by removing vegetation and reducing the base height closer to eye level. This has been explained to our members by Green Bean Design when modelling was used to explain the process at the Rye Park Drop-in days in November 2019.

The proponent was not been able to give straight answers to members of the community at the Drop-in sessions, as it appeared to be a session to collect the concerns of the community rather than address them. This further increased the concerns of the community about the project and the proponent's ability to manage it effectively. Questions continue to be unanswered regarding the sourcing of water.

At the Rye Park Community Consultative Committee (CCC) the proponent has not adequately answered questions on notice in a timely manner. The proponent has posted minutes (March 2020) to their website which have not been approved by the CCC as the proponent has twice postponed the follow up meeting.

Those opposing the project are no longer represented on the Rye Park Progress Association as there are a greater proportion of hosts and supporters currently on the committee. The pressure to leave this group is directly related to conflicting beliefs and the private meetings arranged by the proponent with hosts. Whilst the proponent claims that those who support the wind farm are afraid to voice their opinions in the community, this is clearly no longer the case. Further, as the proponent identifies approximately 330 residence surrounding the wind farm, with _____ involved as host or taking a Neighbour benefit. With over 100 submissions opposing the previous application, the Department would be well aware that there is significant and increasing community opposition to this project and must take this into account when considering this Modification Application.

It would appear Appendix I: Stakeholder and Community Engagement Plan is bulked out by materials from previous owners of the project as far back as 2013 and these items should not be considered in this application.

Noise impact will increase due to the increased size of the currently unknown model of nacelle. The desktop modelling can not accurately replicate the way sound travels throughout the valley and along the length of the project. Sonus has again been able to provide in a manner than can be understood by our members, therefore, we have no way of knowing how we will be affected until construction is complete, which is unsatisfactory.

Additionally, our members point to the investigation commissioned by South Gippsland Shire Council and conducted by James C. Smith and Associates, which found that the wind farm had caused “nuisance under Victoria’s Public Health and Wellbeing Act”. With this in mind, the community has no confidence in the reports provided to the proponent regarding sound and noise.

The members of the Rye Park Action Group are disappointed that no hard copy of the submission was provided to the community as had been done previously and that a was only provided when requested by a community member. This single copy arrived at the Rye Park post office on Wednesday 27th May. This is not reasonable as the Post Office has reduced opening hours due to COVID19 restrictions allowing minimal access to the document by members of the public who do not have internet facilities.

It is not reasonable that the proponent assumes that all residents/households have internet and/or computer access and/or capabilities and the data available to download and read the document. More copies of the entire document should have be available to the communities of Rye Park, Boorowa and Yass from the first day of the exhibition period, to allow enough time to read the submission and formulate an informed reply.

In door knocking to the Rye Park community by our members, it was discovered that the majority of village residents/households were not aware of the planned Modification to the project and some new residents did not know that the project even existed.

During this exhibition period, Hilltops Council also had their Draft Local Strategic Planning Statement on Public Exhibition, meaning that busy workers in our group had little time to adequately consult the Modification as well.

It is concerning to the group that members of the community have been repeatedly approached to sell their property to the proponent, through acquisition and that properties are marked on the project map as being part of the development, when no agreement has been entered into before the documents were released. This includes the acquisition into peoples land to cut corners on the external roads. It has been suggested that these residents contact the National Wind Farm Commissioner.

The Action Group questions the validity of the approved proposal prior to the modification, when the proponent at the March 2020 CCC meeting said that the previous roads and clearing assessment were inadequate and had to be redone, resulting in the modification to increase internal roads from 12m to 30 metres wide. This provides no confidence to the community and shouldn’t provide any to the Department either.

Our Action Group has significant concerns about the project and the proposed Modifications impact on the Rye Park Public School. When the original development was proposed in 2014, there were approximately 18 students in the school. There are currently 4 students. The drop in numbers may be attributed to a range of concerns for families including student welfare and wellbeing, noise, traffic movements and disruption to learning. This is the first wind farm project that will sandwich a school between two clusters (Bango Wind Farm and RP Wind Farm) of 200m high towers of unknown noise, wind and cumulative synchronised tonality. Additionally, there has been in increase in houses for sale in the village since the approval of the wind farm. This goes against the current trend of small rural villages increasing in size, especially within an hours drive of the national capital and larger employment centre’s including Goulburn and Young. If the Modification were to be approved, it is assumed that further residents would leave and the school would ultimately close.

Two members of our community have spoken to members of the Hilltops Council who had not heard of the modification, yet the documents provided note consultation with Hilltops council.

The members of our Action Group actively support all members of the Rye Park Wind Farm community, some of whom have been aware of this project since its inception in 2008. The length of time taken to determine the future of the project has seen changes in developer companies and multiple staff which has meant that community members have increasingly become disheartened with the planning process. The protracted decision-making process has led to mental health issues for some and the increased anxiety with ongoing question marks regarding potential further modifications to this project.

The Rye Park Action Group therefore requests that the Department of Planning, Industry and Environment reject the Modification 1.

The Rye Park Action Group would welcome the opportunity to discuss this submission face-to-face in Rye Park with the Department and its independent assessors, to give the community the same opportunity to have their voices heard, that the proponent and hosts have had since the last approval.

We reserve the right to make further submissions once