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Planning and Assessment
Department of Planning, Industry and Environment
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1st June 2020

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

Dear Sirs/Ma'ams,

Please find below the reasons for my objection to the Mod 1 for the Rye Park Wind Farm (RPWF) submitted to the DPIE, by TILT Renewables.

- Mistakes in the Submission that indicate that TILT Renewables (TILT) have not checked the details effectively, therefore leaving the community, including myself, to question TILT's ability to implement the construction of the development adequately. ie paragraph 1 "to the west of Rye Park", when the wind farm is in fact, to the east of Rye Park.
- Lack of direct consultation with the uninvolved community despite TILT's claims to the contrary. As a member of Rye Park Wind Farm Community Consultative Committee (CCC), this has been the overwhelming response that I have received about the Mod 1. The local community who are not part of the development, but who live within 5km of turbines, have not been adequately informed about the Modification and the impact it will have on them. This includes all aspects of the Modification application – height increase, changes to the development corridor, and the preferred transport route for heavy and over-dimensional vehicles.
- Lack of community consultation was evident at the November 2019 Community Drop-in at Boorowa where only 8 members of the community turned up, four of whom were members of the CCC. This indicates lack of transparency with the Boorowa community.
- Follow up from the Community Drop-in meetings was poor as requests for two photo-montages for my property were never followed up, and my request for the company to contact the Principal of the Boorowa Central School (at the Rye Park Community Drop-in meeting and at the March 2020 CCC meeting) were also not followed up. Details of the Principals contact details were given to a Tilt staff member on each occasion.
- Increased visual impact (at each residence viewing turbines) by 27%, is significant and counteracts the reduction in turbines proposed by the Dept in the Approved Development. The 71% increase in Rotor Sweep area is more than significant as the movement of the blades has a greater visual impact than the appearance of the tower to tip-height itself. This will create significantly greater shadow flicker and blade glint, causing further annoyance, visual impact and distraction in a variety of settings across and beyond the site of the project.
- Lack of consultation with the local school executive. The Principal of Rye Park Public School was unaware of the Modification application until informed by a local resident. This, despite the school students being taken to the Rye Park Drop-in session, which may have been

organised by members of her staff, who are in support of the project. There is no other school in Australia, that sits in such close proximity to so many turbines (between Bango and Rye Park Wind farms), and therefore the increased height should be rejected as well as the other modifications, so that the school and its students are not further impacted by more turbines, than those previously approved.

- Increased clearing for internal roads, by over 50% which will have impact on vegetation that is home to fauna and birdlife both local, and those moving into the area following the NSW bushfires.
- Changes to layout to move Transmission line (up to 330kV) along the Urumwalla Creek on the western side of the range at Residence 47, 49 and 51. This leads to the Blakney Creek where Local Land Services has been trying to re-establish the endangered Southern Pygmy Perch, and Yellow Spotted Bell Frog. As of 1st June 2020, Luke Pearce (Department of Fisheries Conservation Manager - Greater Murray, Aquatic Habitat Protection), was not aware of the Modification application and had not been informed by involved landowners of the changes to the internal footprint that may impact his work.
- Lack of consultation with local Aboriginal people and users of Aboriginal sites. The Aboriginal Cultural Heritage Assessment did not include consultation with local Aboriginal people from the Boorowa – Rye Park area.
- Noise assessment – inadequate and non-compliant. Please see submission by Andrew Field for details. Questions were raised about the effectiveness of the Sonus report that formed the original Application which was approved. Desktop analysis for this report is no better and does not take into account the nature of the area that the project will be in. As the proponent has not yet selected the turbine type, the current report is not useful.
- No consultation with residents living on streets/sites where land is planned to be acquired for transport routes in Boorowa – see submission from Chris and Jenny Carter. The transport route for smaller vehicles has also be under question throughout the process, with the proponent unable to confirm the number of vehicles that will travel via Cooks Hill Road from Yass or from Gunning/Dalton area along the Rye Park Road. This is of great concern for those travelling, living and farming along these roads, and additionally for those whose children travel on school buses on any of the transport routes.
- Given the 27% increase in size of the turbines and the 71% increase in the rotor sweep area, all requirements to inform, support and provide mitigations as outlined in the Approval should be further apply to all residence a further 3 km from the turbine to accommodate the greater visual impact of the turbine. It is not just the height that is visually impacting but the rotation of the blades and the movement.
- Bird strike – Superb Parrots – increase in likelihood due to proximity to group and 71% greater blade sweep. This should not be allowed following the death of so many birds and the loss of habitat during the 2019/20 summer bush fires. Contrary to the reasoning of the Bango Community Representative who told my students that more birds would die flying into the windows of their house, than are killed by turbines, I have never seen a Superb Parrot, Swift Parrot or Wedge Tailed Eagle would come that close to a house, although I have seen them on my property amongst the trees and flying high above the buildings.
- At no time during CCC meetings did the company representatives indicate that a Modification to the Development Approval was possible or being considered until mid 2019. Repeated questioning of occurred at meetings since the 2016 approval was answered by the proponent that the turbines could not be higher than 157m. As the general public is not aware of the Development process this was deceptive of the company to continually imply

that they had no ability to increase the turbine height. The news of the modification plan came as a complete surprise.

- TILT continues to provide materials to the community that do not accurately depict how the the landscape will look post construction. The imagery chosen for pamphlets, newsletters, website etc continues to depict less hilly and wooded landscapes than those in the RPWF corridor, despite CCC request to desist. This is deceptive and confusing for the community, who need to make a properly informed choice.
- TILT indicated at the March 2020 Community Consultative Committee Meeting that the investigations by the previous proponent, Trustpower, were insufficient and vastly “inadequate”, and as a consequence the internal road corridor would need to increase from 12m to 30m. Therefore, the Department was mislead by Trustpower in the 2014 submission which lead to the approved a 92 x 157m turbine development based on a poor research investigation. The entire project should therefore be scrapped.
- I disagree with TILT’s statement that it is “difficult for locals...supportive of the project to publicly express their views”. They are well supported by the Australian Wind Alliance, who supply them with materials with which to promote their point of view and who intimidate those opposing wind projects. That they choose not to further rock the boat in their small community is more likely because they value the close community connections that have been harmed by project since its inception in 2008. It is equally difficult for those opposed to the Wind Farm to voice their opinion within the community and some of those who are “neutral” say nothing despite being opposed.
- TILT submission discredits non-involved landowners and neighbours of the local community in the Community Risk Assessment section Page22 Stakeholder and Community Engagement Plan, R10 “Threats of violence against TILT Renewables Staff” where it states that “Consultation sessions are targeted by anti-wind farm protestors” and that “Landowners become upset or outraged” and “supporters are intimidated and do not participate”. After 12 years of dealing with multiple companies and company representatives, it is evident that there is frustration amongst the community that this project has neither started, nor gone away. This has created significant wellbeing issues for members of the community and for some, mental health and ongoing health issues. The longer this process takes, the great the impact on the people of the community, regardless of their stance on this development.
- To get to this point through the development process has been onerous, stressful and time consuming to say the least. As farmers, workers, community members and volunteers the people of this community do not have the time, financial or technological resources to respond adequately to this submission in only 3 weeks. Having been through the same process for the 2014 application and then preparing for the PAC in 2016, the community, including ourselves, is tired and deserves an answer once and for all. There should be no more Modifications, and a final decision with a commencement date, decided by the Department. The proponent has had their opportunity to present its proposal, as had Trustpower previously. It should now go to a determination by the Department, without Tilt having a further opportunity to respond to submissions.

I reserve the right to make further submissions.

Christine Hawkins