

Planning and Assessment  
Department of Planning, Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124  
3rd June 2020

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

I object to the Rye Park Wind Farm modification application and adopt the submissions of Andrew Field and his family dated June 2020.

My objections are on the grounds of poor community consultation, visual impacts, noise impacts, water impacts, biodiversity impacts and other topics as set out below.

I am also extremely disappointed that Tilt advised at several Consultative Committee meetings (CCC) of which I am a non-involved host member, that they were going to present the Modification prior to submitting to the Department so we could review and discuss as a committee. This did not happen. They have certainly used the excuse of COVID-19 to full effect to delay and avoid giving the committee opportunity to have the proponents on hand to ask questions of.

The fact that the Department has put this modification on Exhibition during these unprecedented times (COVID-19) has also negated the Community reasonable opportunity to properly assess and review this modification. There are restrictions on social gatherings that at the time the Modification was listed on the 13<sup>th</sup> May 2020, NSW had not declared the roadmap for easing of restrictions. The fact that some members of the community do not have access to internet either at home or through community venues such as Libraries, one prevented them from viewing the Modification but more importantly, prevented them from being able to sign up to the Department's website to lodge a submission.

I further feel the process is again slanted towards the Proponent having an advantage over community members – limit of 1 application per address and a cap of 10,000 words on submission. The Proponents documents run over a thousand pages and yet the community is only given 10000 words to respond to a project that has ramification on them for another 25 plus years as if the last 10 years or so hasn't already had effect enough.

### **Community Consultation**

My family decided on a tree change move and purchased vacant property in the Yass Shire area to build our family home. At no point from the realtor or Yass Council during the purchase and subsequent build were we told that a Proponent has been scoping the area for a wind farm. It was only through notification of Andrew, that we were made aware of the proposed Rye Park Wind Farm.

From dealings with Epuron, TrustPower and now Tilt, the Proponents have continued to be disappointing in how they engage with the community. This project crosses over three council areas – Hilltops, Upper Lachlan Shire and Yass Valley, and the proponents continually favour Yass as the representative, yet it has the least amount of footprint for the project. They should in fact have been doing the bulk of their consultancy with the residents within Rye Park township, yet this has not been the practice on the ground.

The recent Information Sessions were simply a tick box exercise as the vast majority of questions put to the staff were unable to be answered.

### **Visual Impact**

The fact that the Modification is to increase each wind turbine by 27% is not insignificant. 200 metres will be the largest infrastructure on the landscape, dominating everything both man built and in nature.

I see Telstra Tower (195metres) on top of Black Mountain (elevation 812m) in Canberra every day on my drive along the Barton Highway into Canberra, so I am well aware of what these turbines will look like on hill crests. The tower is visible from before Boundary Lane on the overtaking section, and according to the graphic in Google maps, is an elevation of 582m so to Black Mountain is a difference of 230m. This would be in line with the elevations around the Rye Park Project. The fact they have moving parts which the Modification will increase rotor sweep area (RSA) by **71% and are not in single formation can only draw the eye to them!**

For the assessment to say due to the removal of the 12 turbines, the individual turbine height and RSA increase will not significantly alter the current VI assessment is misleading. At no point do you view the project from a single vantage point. Each cluster will be more imposing due to the increase as opposed to a reduction.

### **Noise**

Computer modelling does not give an accurate result of the true effect on properties as it doesn't account for their individual topography or house construction. The investigation commissioned by South Gippsland Shire Council and conducted by James C. Smith and Associates, found the wind farm had caused "nuisance under Victoria's Public Health and Wellbeing Act". With this in mind, I have no confidence in the reports provided by the proponent regarding sound and noise.

One only has to see where the fog settles across the landscape to understand how the sound will also carry across the topography.

### **Water**

Despite repeated requests by community members and the CCC to the three proponents, they have yet to declare where they will obtain their water from for this project. The Yass Notice Board has received numerous comments from community members outraged by the sale of potable water for the nearby wind farm at Boorowa.

### **Biodiversity**

Given the extreme loss of habitat, flora and fauna that occurred during the recent Australian bushfires that were cited as being unprecedented, why would the Department approve a project that intends to clear more land? Fauna not typically seen in these regions as well as more general species, are already migrating to unburnt areas.

<https://www.greeningaustralia.org.au/flocking-save-superb-parrot/>

Work was done in 2018 through Whole of Paddock Rehabilitation (WOPR) program by assisting farmers to restore cleared land. Why is the Department of Planning now intending to clear huge quantities of the remaining bush land for this project? The number of turbines may have reduced; however, the increase size requires greater clearance around each tower , crane hardstand and associated infrastructure.

Why is that Canberra ACT Labor Government has concern over protecting the habitat of the Superb Parrot, yet NSW does not apply the same consideration?

<https://canberraweekly.com.au/franklin-grasslands-preserved-as-environmental-offset/>

[https://www.environment.act.gov.au/cpr/conservation\\_and\\_ecological\\_communities/threatened\\_species\\_factsheets/factsheets2/superb-parrot-polytelis-swainsonii](https://www.environment.act.gov.au/cpr/conservation_and_ecological_communities/threatened_species_factsheets/factsheets2/superb-parrot-polytelis-swainsonii)

[https://www.planning.act.gov.au/\\_data/assets/pdf\\_file/0012/1179678/SA20\\_FINAL-Superb-Parrot-Habitat-Improvement-Plan-March-2015\\_endorsed-by....pdf](https://www.planning.act.gov.au/_data/assets/pdf_file/0012/1179678/SA20_FINAL-Superb-Parrot-Habitat-Improvement-Plan-March-2015_endorsed-by....pdf)

<https://www.environment.nsw.gov.au/threatenedspeciesapp/profile.aspx?id=10645>

Extract - May forage up to 10 km from nesting sites, primarily in grassy box woodland.

The increase of 71% of the rotor sweep area is acknowledged as increasing the risk to the Superb parrot.

One of the hosts who participated in the conservation of Pygmy Perch in his own dam failed to mention the impact the Rye Park Wind Farm will have, signifying this is all about the money.

<https://riversofcarbon.org.au/farmers-helping-to-save-the-southern-pygmy-perch/>

Found in only three places in NSW.

<https://www.smh.com.au/environment/conservation/langs-creek-yass-last-refuge-for-endangered-southern-pygmy-perch-20160104-glywih.html>

### **Will this project deliver what it states?**

Where has the Department ever done a post implementation review to identify if any wind farm built in Australia has achieved its stated claims?

Modification Report – page 11

“The Project will make a significant contribution to the shortfall in generation that will arise with the forecast retirement of Lidell Power Station in the near future and other coal-fired generators over the coming years”

I challenge the language “significant contribution”. As per the Clean Energy Australia Report 2020

Extract - Wind contributed 8.5% out of renewables contributing 24% to the grid.

The Rye Park Wind Farm cannot even contribute double digits!!!

### **Other matters**

I also challenge the statement the project offers 100% renewable energy. The only component that holds true to is the wind itself. The turbine is a mechanical device relying on two of the highest CO2 emitters in its construction – steel and concrete. Over its life it will require gearbox oil, bearings, some braking assistance in the form of a pad or shoe at the very least. There is also the fossil fuel in use by vehicles attending the site for maintenance. The blades being composite are not recyclable and in fact the epoxy resin is highly toxic to the environment.

**I again reiterate I am opposed to this modification request.**

Given the sheer volume of documentation accompanying this request, I reserve the right to submit additional information to my submission.