

ROFF Paul

From: ROBERTS Tony
Sent: Tuesday, 8 September 2015 12:25 PM
To: WADE Lawrie
Cc: ROFF Paul
Subject: RE: Wind Farm Code



Thanks Lawrie

I agree.

Tony

73(2)Irrelevant

From: ROBERTS Tony
Sent: Monday, 7 September 2015 9:21 PM
To: ROFF Paul; WADE Lawrie
Subject: Fwd: Wind Farm Code

Sent from my iPhone

Begin forwarded message:

73(2)Irrelevant

On 7 Sep 2015, at 5:52 pm, ROBERTS Tony <Tony.Roberts@ehp.qld.gov.au> wrote:

Greg

I got your phone message on the above. We have reviewed the draft code (noting that it is based on independent technical advice) and have no concerns.

Regards

Tony



Tony Roberts
Deputy Director-General
Environmental Policy and Planning
Department of Environment and Heritage Protection

P 07 3330 5990
400 George St, Brisbane QLD 4000
GPO Box 2454, Brisbane QLD 4001

The information in this email together with any attachments is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. There is no waiver of any confidentiality/privilege by your inadvertent receipt of this material.

Any form of review, disclosure, modification, distribution and/or publication of this email message is prohibited, unless as a necessary part of Departmental business.

If you have received this message in error, you are asked to inform the sender as quickly as possible and delete this message and any copies of this message from your computer and/or your computer system network.

R

ROFF Paul

From: CSS
Sent: Friday, 28 August 2015 8:26 AM
To: ROFF Paul
Subject: RE: Draft Wind Farm Module.



Hi Paul

I understand that you have been speaking with Nick Weinert regarding CSP input, but wanted to advise that the remainder of the division has come back with a NIL response – FYI.

Kind Regards

Ang

Ang Johanson

Project Officer

Office of the Deputy Director-General | Conservation & Sustainability Services

Department of Environment and Heritage Protection

P 07 3310 6241

Level 5, 400 George Street, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001

Working Part-Time Mon, Tues & Fri

From: ROFF Paul

Sent: Monday, 24 August 2015 1:51 PM

To: Corro EHP CSS DDG

Subject: RE: Draft Wind Farm Module.

Hi Ang

I have until 28 8 to prepare reply letter. So if I could get a response by COB 26 8 that would be good.

I don't need a detailed response as the letter indicates that further consultation will follow.

Regards

Paul Roff

Manager

Environmental Planning

Department of Environment and Heritage Protection

P 07 3330 5776

Level 10, 400 George St, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001

From: JOHANSON Ang **On Behalf Of** Corro EHP CSS DDG

Sent: Monday, 24 August 2015 1:25 PM

To: ROFF Paul

Subject: RE: Draft Wind Farm Module.

Hi Paul

I think we may have a NIL response for our division, but I'm going to send your request out to our business units just to be sure. Could you please advise how soon you require a response from us please?



Kind Regards
Ang

Ang Johanson
Project Officer

Office of the Deputy Director-General | Conservation & Sustainability Services

Department of Environment and Heritage Protection

P 07 3310 6241

Level 5, 400 George Street, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001

Working Part-Time Mon, Tues & Fri

From: ROFF Paul
Sent: Monday, 24 August 2015 12:18 PM
To: ROBSON Geoff; Corro EHP ESR DDG; Corro EHP CSS DDG
Cc: WADE Lawrie; Planning Support
Subject: Draft Wind Farm Module.

Hi Geoff and DDGs for ESR and CSS.

Please find attached a letter from the Deputy Premier on the reworked draft SDAP wind farm code and planning guideline. Would you please nominate an officer I can liaise with to prepare an EHP consultation response? In the short term I will prepare a letter from our Min to the DP indicating a desire to review, and be involved in further consultation on, the reworked module and planning guideline.

Regards

Paul

Paul Roff

Manager

Environmental Planning

Department of Environment and Heritage Protection

P 07 3330 5776

Level 10, 400 George St, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001

ROFF Paul

From: DAVID Antoine
Sent: Wednesday, 26 August 2015 11:17 AM
To: ROFF Paul
Cc: Corro EHP ESR RCaCS; DELZOPPO Lindsay; Corro EHP EPP DDG; WADE Lawrie; COOK David
Subject: RE: Draft Wind Farm Module.
Attachments: Bullet points for draft wind farm state code acoustics review by Dr Antoine David 24th August.docx



Hi Paul,

David Cook asked me to review the Draft Wind Farm State code supplied in Corro and provide you with a bullet point list of technical point

Please find attached the bullet point list I made and feel free to contact me in you need any clarifications or explanations on any of the points made

Kind regards



Dr Antoine David PhD MEng MAAS
Technical Specialist (Noise)
Technical Support Unit | Regulatory Capability and Customer Service
Department of Environment and Heritage Protection

P 07 3330 5574
400 George Street
Brisbane QLD 4000

From: ROFF Paul
Sent: Monday, 24 August 2015 1:22 PM
To: COOK David
Cc: Corro EHP ESR RCaCS; DELZOPPO Lindsay; DAVID Antoine; Corro EHP EPP DDG; WADE Lawrie
Subject: RE: Draft Wind Farm Module.

Hi David

I also have been asked to prepare a response to this letter. Lawrie Wade tells me there was a previous letter stating out position that wind farms should not be an ERA. The reply letter needs to restate out opposition to Wind Farms being an ERA.

Regards

Paul Roff

Manager

Environmental Planning

Department of Environment and Heritage Protection

P 07 3330 5776

Level 10, 400 George St, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001



From: COOK David
Sent: Monday, 24 August 2015 1:11 PM
To: ROFF Paul
Cc: Corro EHP ESR RCaCS; DELZOPPO Lindsay; DAVID Antoine
Subject: RE: Draft Wind Farm Module.

Hi Paul,

Antoine David from my team is preparing a response currently for MECS item.

CTS No: 19104/15 for your information/input concerning: wind farms / invitation for consultation on draft Wind Farm State Code and Planning Guideline / Queensland development assessment framework / development applications for new or expanded wind.

Happy for you to be cc'd into his response.

Regards



David Cook
Manager
Technical Support and Community Response
Regulatory Capability and Customer Service
Department of Environment and Heritage Protection
P 07 3330 5583 M [redacted] - Personal Inform
Level 9, 400 George St, Brisbane QLD 4000
GPO Box 2454, Brisbane QLD 4001

From: DI TULLIO Tonina **On Behalf Of** Corro EHP ESR DDG
Sent: Monday, 24 August 2015 12:54 PM
To: ROFF Paul
Cc: COOK David; Corro EHP ESR RCaCS; DELZOPPO Lindsay
Subject: RE: Draft Wind Farm Module.

Hi Paul

The ESR contact would be David Cook, Manager, Technical Support and Community Response on x25583.

Kind regards
tdt

Tonina Di Tullio
Project Officer
Office of the Deputy Director-General
Environmental Services and Regulation
Department of Environment and Heritage Protection
P 07 3330 5549
Level 13, 400 George St, Brisbane QLD 4000
GPO Box 2454, Brisbane QLD 4001

From: ROFF Paul
Sent: Monday, 24 August 2015 12:18 PM
To: ROBSON Geoff; Corro EHP ESR DDG; Corro EHP CSS DDG

Bullet points for Draft Wind Farm State Code acoustics review

- Acoustics problem associated with wind-farms are due to the infrasonic and low frequencies harmonics and their interaction between several turbines. Those generates annoyances and to higher intensities health effects.
- By using both a time average and frequency weighting, by definition, all those harmonics disappear and as such no assessments of the impact of those harmonics can be made.
- To assess those harmonics, it is necessary to use unfiltered data and no time average.
- The low frequencies and infrasound effects cannot be assessed by dBA. By designed, the A filtering process takes away low frequency and infrasound. Low frequencies and infrasound need to be assessed by dBlin which is unfiltered data according to frequency.
- Annoyance has not been considered in either guideline
- Wind masking has been applied as if it was masking noise of similar frequencies and this is not the case.
- The distance of 1500m as a buffer will not be sufficient for the current size of wind turbine. This distance had originated years ago for much smaller size turbines and at the time was probably a correct distance.
- The noise criteria proposed in the draft wind farm sate code is most likely not protect residents for their health and well-being and will not protect their environmental values.
- It is uncertain and unlikely that the noise criteria proposed in the draft wind farm sate code will protect animals such as farmed animals for their health and well-being from low and infrasonic noise exposure.

ROFF Paul

From: ROBSON Geoff
Sent: Tuesday, 25 August 2015 10:59 AM
To: ROFF Paul
Cc: HODGMAN Laurie; ROSIER Maria
Subject: Re: Draft Wind Farm Module.
Attachments: image003.png; image004.png

Hi Paul
Pls see below
Geoff

Sent from my iPhone

On 25 Aug 2015, at 9:29 am, HODGMAN Laurie <Laurie.Hodgman@ehp.qld.gov.au> wrote:

Geoff, I've had a quick look and I don't think we'll need a lot of involvement at this stage because there's no mention of looking at an ERA under the EP Act for windfarms. But I think we could nominate Maria to receive further communications on it.

Laurie

<image003.png>**Laurie Hodgman**
Director
Environmental Policy and Legislation
Department of Environment and Heritage Protection
P 07 3330 5896 h4 - Personal Inform
Level 10, 400 George St, Brisbane Qld 4000
GPO Box 2454, Brisbane Qld 4001

From: ROBSON Geoff
Sent: Monday, 24 August 2015 1:50 PM
To: HODGMAN Laurie
Subject: FW: Draft Wind Farm Module.

Hi Laurie

Somewhat ironically it would probably be Lawrie W we'd nominate.

However, is this one that Rachel could look at, to the extent we need to be involved?

Thanks
Geoff

From: ROFF Paul
Sent: Monday, 24 August 2015 12:18 PM
To: ROBSON Geoff; Corro EHP ESR DDG; Corro EHP CSS DDG
Cc: WADE Lawrie; Planning Support
Subject: Draft Wind Farm Module.

Hi Geoff and DDGs for ESR and CSS.

Please find attached a letter from the Deputy Premier on the reworked draft SDAP wind farm code and planning guideline. Would you please nominate an officer I can liaise with to prepare an EHP consultation response? In the short term I will prepare a letter from our Min to the DP indicating a desire to review, and be involved in further consultation on, the reworked module and planning guideline.

Regards

Paul

<image004.png>**Paul Roff**

Manager

Environmental Planning

Department of Environment and Heritage Protection

P 07 3330 5776

Level 10, 400 George St, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001

ROFF Paul

From: COOK David
Sent: Monday, 24 August 2015 1:11 PM
To: ROFF Paul
Cc: Corro EHP ESR RCaCS; DELZOPPO Lindsay; DAVID Antoine
Subject: RE: Draft Wind Farm Module.



Queensland
Government

Hi Paul,

Antoine David from my team is preparing a response currently for MECS item.

CTS No: 19104/15 for your information/input concerning: wind farms / invitation for consultation on draft Wind Farm State Code and Planning Guideline / Queensland development assessment framework / development applications for new or expanded wind.

Happy for you to be cc'd into his response.

Regards



Queensland
Government

David Cook

Manager

Technical Support and Community Response

Regulatory Capability and Customer Service

Department of Environment and Heritage Protection

P 07 3330 5583 M4 - Personal Info

Level 9, 400 George St, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001

From: DI TULLIO Tonina **On Behalf Of** Corro EHP ESR DDG
Sent: Monday, 24 August 2015 12:54 PM
To: ROFF Paul
Cc: COOK David; Corro EHP ESR RCaCS; DELZOPPO Lindsay
Subject: RE: Draft Wind Farm Module.

Hi Paul

The ESR contact would be David Cook, Manager, Technical Support and Community Response on x25583.

Kind regards
tdt

Tonina Di Tullio

Project Officer

Office of the Deputy Director-General

Environmental Services and Regulation

Department of Environment and Heritage Protection

P 07 3330 5549

Level 13, 400 George St, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001



From: ROFF Paul
Sent: Monday, 24 August 2015 12:18 PM
To: ROBSON Geoff; Corro EHP ESR DDG; Corro EHP CSS DDG
Cc: WADE Lawrie; Planning Support
Subject: Draft Wind Farm Module.

Hi Geoff and DDGs for ESR and CSS.

Please find attached a letter from the Deputy Premier on the reworked draft SDAP wind farm code and planning guideline. Would you please nominate an officer I can liaise with to prepare an EHP consultation response? In the short term I will prepare a letter from our Min to the DP indicating a desire to review, and be involved in further consultation on, the reworked module and planning guideline.

Regards

Paul

Paul Roff

Manager

Environmental Planning

Department of Environment and Heritage Protection

P 07 3330 5776

Level 10, 400 George St, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001



Queensland
Government

Cc: WADE Lawrie; Planning Support
Subject: Draft Wind Farm Module.

Hi Geoff and DDGs for ESR and CSS.

Please find attached a letter from the Deputy Premier on the reworked draft SDAP wind farm code and planning guideline. Would you please nominate an officer I can liaise with to prepare an EHP consultation response? In the short term I will prepare a letter from our Min to the DP indicating a desire to review, and be involved in further consultation on, the reworked module and planning guideline.

Regards

Paul

Paul Roff

Manager

Environmental Planning

Department of Environment and Heritage Protection

P 07 3330 5776

Level 10, 400 George St, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001

73(2)Irrelevant

From: DAVID Antoine
Sent: Wednesday, 26 August 2015 11:17 AM
To: ROFF Paul
Cc: Corro EHP ESR RCaCS; DELZOPPO Lindsay; Corro EHP EPP DDG; WADE Lawrie; COOK David
Subject: RE: Draft Wind Farm Module.

Hi Paul,

David Cook asked me to review the Draft Wind Farm State code supplied in Corro and provide you with a bullet point list of technical point

Please find attached the bullet point list I made and feel free to contact me in you need any clarifications or explanations on any of the points made

Kind regards



Dr Antoine David PhD MEng MAAS

Technical Specialist (Noise)

Technical Support Unit | Regulatory Capability and Customer Service

Department of Environment and Heritage Protection

P 07 3330 5574

400 George Street

Brisbane QLD 4000

From: ROFF Paul

Sent: Monday, 24 August 2015 1:22 PM

To: COOK David

Cc: Corro EHP ESR RCaCS; DELZOPPO Lindsay; DAVID Antoine; Corro EHP EPP DDG; WADE Lawrie

Subject: RE: Draft Wind Farm Module.

Hi David

I also have been asked to prepare a response to this letter. Lawrie Wade tells me there was a previous letter stating out position that wind farms should not be an ERA. The reply letter needs to restate out opposition to Wind Farms being an ERA.

Regards

Paul Roff

Manager

Environmental Planning

Department of Environment and Heritage Protection

P 07 3330 5776

Level 10, 400 George St, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001

From: COOK David

Sent: Monday, 24 August 2015 1:11 PM

To: ROFF Paul

Cc: Corro EHP ESR RCaCS; DELZOPPO Lindsay; DAVID Antoine

Subject: RE: Draft Wind Farm Module.

Hi Paul,

Antoine David from my team is preparing a response currently for MECS item.

CTS No: 19104/15 for your information/input concerning: wind farms / invitation for consultation on draft Wind Farm State Code and Planning Guideline / Queensland development assessment framework / development applications for new or expanded wind.

Happy for you to be cc'd into his response.

Regards



David Cook

Manager

Technical Support and Community Response

Regulatory Capability and Customer Service

Department of Environment and Heritage Protection

P 07 3330 5583 M - Personal Info

Level 9, 400 George St, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001

From: DI TULLIO Tonina **On Behalf Of** Corro EHP ESR DDG

Sent: Monday, 24 August 2015 12:54 PM

To: ROFF Paul

Cc: COOK David; Corro EHP ESR RCaCS; DELZOPPO Lindsay

Subject: RE: Draft Wind Farm Module.

Hi Paul

The ESR contact would be David Cook, Manager, Technical Support and Community Response on x25583.

Kind regards

tdt

Tonina Di Tullio

Project Officer

Office of the Deputy Director-General

Environmental Services and Regulation

Department of Environment and Heritage Protection

P 07 3330 5549

Level 13, 400 George St, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001

From: ROFF Paul

Sent: Monday, 24 August 2015 12:18 PM

To: ROBSON Geoff; Corro EHP ESR DDG; Corro EHP CSS DDG

Cc: WADE Lawrie; Planning Support

Subject: Draft Wind Farm Module.

Hi Geoff and DDGs for ESR and CSS.

Please find attached a letter from the Deputy Premier on the reworked draft SDAP wind farm code and planning guideline. Would you please nominate an officer I can liaise with to prepare an EHP consultation response? In the short term I will prepare a letter from our Min to the DP indicating a desire to review, and be involved in further consultation on, the reworked module and planning guideline.

Regards

Paul

Paul Roff

Manager

Environmental Planning

Department of Environment and Heritage Protection

P 07 3330 5776

Level 10, 400 George St, Brisbane QLD 4000
GPO Box 2454, Brisbane QLD 4001

Released under the
RTI Act 2009 - EHP

R

Bullet points for Draft Wind Farm State Code acoustics review

- Acoustics problem associated with wind-farms are due to the infrasonic and low frequencies harmonics and their interaction between several turbines. Those generates annoyances and to higher intensities health effects.
- By using both a time average and frequency weighting, by definition, all those harmonics disappear and as such no assessments of the impact of those harmonics can be made.
- To assess those harmonics, it is necessary to use unfiltered data and no time average.
- The low frequencies and infrasound effects cannot be assessed by dBA. By designed, the A filtering process takes away low frequency and infrasound. Low frequencies and infrasound need to be assessed by dBlin which is unfiltered data according to frequency.
- Annoyance has not been considered in either guideline
- Wind masking has been applied as if it was masking noise of similar frequencies and this is not the case.
- The distance of 1500m as a buffer will not be sufficient for the current size of wind turbine. This distance had originated years ago for much smaller size turbines and at the time was probably a correct distance.
- The noise criteria proposed in the draft wind farm sate code is most likely not protect residents for their health and well-being and will not protect their environmental values.
- It is uncertain and unlikely that the noise criteria proposed in the draft wind farm sate code will protect animals such as farmed animals for their health and well-being from low and infrasonic noise exposure.