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**COMMENTS IN RESPONSE TO REQUEST BY AGL (25<sup>TH</sup> FEBRUARY 2016) FOR AN EXTENSION TO THE LAPSE DATE FOR THE SILVERTON WIND FARM PROJECT.**

**The Silvertown Wind Farm Project is becoming an oozing sore on the community of Silvertown. The project has been ongoing since 2008, when residents discovered the intention of building this industrial nightmare on the beautiful, iconic hills of the Barrier Ranges, overlooking one of the most historically important towns in Australia. How did we discover this? on the front page of the local newspaper, The Barrier Daily Truth. The proponents of the time Epuron, did not even do the residents of this community the courtesy of speaking to them face to face to inform them of their intentions.**

**Well, eight years down the track, nothing has changed. Yes, we have Community Consultative Committee meetings now, but these are more about the current proponents, AGL, turning up when it suits them, to tell us what they are going to do and how it will be done. Not much community consultation happens here.**

**The most recent meeting, held 25<sup>th</sup> February 2016, was held to “tell” the community and Landholders that AGL had on that very day, lodged an application for extension of the lapse date for the Silvertown Wind Farm (from May24th 2016 for a further five years) with the Department of Planning and Environment. We had previously been “promised” (and I use the term loosely) by Neil Cooke, Project Manager, that after the last extension (which we were “promised” would never happen) that there would not be another extension to this project! It’s interesting to note that each time one of these extensions is applied for a new project manager is appointed.....is that so AGL can say it hasn’t broken the “promise” of the previous project manager?**

**On Monday 7<sup>th</sup> March 2016, myself and a number of other stakeholders were informed by an email from Helena Orel (Community Stakeholder Engagement**

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Manager) of AGL, that the Silverton Wind Farm Modification (2) was now on Public Display and we could lodge submissions if we so desired. The email also stated that the document was on public display until Friday 18<sup>th</sup> March 2016....only two weeks from notification to closing.

When I accessed the Department of Planning and Environment website to read the Silverton Wind Farm Modification 2 documents, I noticed with some dismay the places the document was on "Public Display" other than the website. The listed places to view the documents were: DPE Bridge Street Sydney; NCC Newtown City Council NSW; Broken Hill City Council and Wentworth Shire Council. No hard copies of the Silverton Wind Farm Modification 2 have been sent to Silverton! A number of residents in Silverton do not have computers, so it is impossible for them to view and comment on this document in the convenience of their own town. They haven't even received notification from AGL that the document is on "Public Display". It isn't very public if the very people this project will affect haven't even been notified!! Surely the onus is on AGL to make every effort to inform ALL stakeholders that the documents are on public display and also to place the documents in the most convenient places possible. Residents without computers have no chance to lodge a submission by March 18<sup>th</sup> as they would have to use the conventional postage system. Don't the residents of Silverton deserve the opportunity to speak about an issue that has been going on for years and driving many of them to total frustration? Or are we to assume that AGL will go to any length to make it difficult...short of stopping them altogether....for Silverton residents to know what is really happening and how they can have their say. I find it disgraceful that AGL can do this and even more so that they have not been made by the Department of Planning and Environment to put this document on public display in Silverton.

On the first page of the Request for Extension to Lapse Date document, filed by AGL, it states one of AGL's reasons for wanting the extension as: "to allow adequate time for AGL to: consult with the Department of Planning and Environment (DPE) and local community/landholders on potential modifications to the Project".

This is a false statement given the information I have just presented. The same thing happened with the original Development Application. One would hope this is not an indication of foul play between our Government Departments and large companies who may be looking for a leg up in their endeavours! (

I have written to the Department of Planning and Environment and AGL outlining this problem and have requested hard copies of the Silverton Wind Farm

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**Modification 2 document as well as an extension on the closing date for submissions to Friday 18<sup>th</sup> April 2016. This should allow time for AGL to deliver the hard copies to Silvertown and give residents some time to send in their submissions by the conventional postage system.**

**AGL states at the beginning of its' Silvertown Wind Farm Request for Extension to Lapse Date that: "AGL supports the Commonwealth Government's commitment to work towards a global agreement to limit global warming to less than 2 degrees and has publicly committed to actions to achieve this including continuing to invest in renewable energy technologies and projects."**

**This is a hypocritical statement. If AGL is so committed to limiting global warming, then why does it own power stations which are fuelled by brown and black coal. Can AGL present evidence to show how many of its coal fired power stations have been decommissioned as a direct result of its renewable energy projects? There is no comfort here for residents living close to the proposed Silvertown Wind Farm. If no fossil fuelled power stations are being taken off- line as a result of renewable energy projects, then what is the point of them? All we are getting is environmental destruction, certainly no benefit.**

**Justification for the Modification.**

**AGL makes the following statements:**

"AGL considers that this modification is justified, for the following reasons:

a) **Importance of the Project:** AGL intends to initially install up to 200MW of renewable energy generation, which could produce in the order of 700,000 MWh per year.

**Could produce? Will it or won't it? This statement says that wind energy is not reliable. AGL cannot tell us how much the wind will blow, for how long or how often. Therefore there is no justification for this project. AGL also states it intends to *initially* install up to 200MW of renewable energy generation. This implies a future extension to the project. AGL needs to be very clear with the Silvertown Community exactly what the full expectations of this project are. This is the true Importance of the Project. We need transparency and honesty from AGL and an extension should not be granted if AGL is not prepared to present this information publicly.**

This amount of energy is sufficient for the average consumption of approximately 120,000 homes, which equates to a reduction of

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approximately 588,000 tonnes of CO2 per annum for the life of the project.

**Do these approximations take into account how much CO2 will be generated in the manufacture of all the components required to build a wind turbine?**

b) **Economic Benefits:** Based on figures estimated in Sinclair Knight Merz' Economic Impact Assessment of AGL's Hallett Wind Farms, dependent upon the size of the project, the cost of the project could be between \$300m and \$500m

**The economic benefits of this proposed project do not exactly fill me with confidence for the future of the Silvertown area, or indeed the region. Dependent on the size of the project, the cost *could* be between \$300m and \$500m. I was under the impression that AGL already knew how big the project was going to be. If this is still unclear, why then have AGL been granted any kind of approval for this project? Shouldn't this have been worked out well before now? The use of the word *could*, appears to give AGL licence to do as it pleases with this project.**

1. Extrapolating the expenditure from Hallett Wind Farms to the proposed Project, AGL estimates:

- a. Regional Project Development and Construction Expenditure to be in the order of \$40m;
- b. The Regional Project Operations expenditure could be up to \$6m per annum for the life of the project;

**Again, the word *could* is used. There is no certainty in this project. It would be unwise for any businesses in this region to place any confidence in any returns from this project.**

c. Employment during the construction of the project could reach approximately 150 people.

***Could and approximately.* It seems this project is all if, but's and maybe's. Again there is no surety in this project to give any confidence to the community.**

d. Community funds of approximately \$15,000 per year may be granted to local community projects."

So the community *may* be granted funds of *approximately* \$15,000 per year. Again, no certainty for the community. The idea of community funds is merely a carrot to entice people to support the project.

**Improvements in Technology:** Approval of Mod 2 would allow time for AGL to conduct a review of the project, taking into account new, more efficient wind turbine generator technologies, primarily the rotor diameter and the overall tip height.

The above statement again makes reference to a review of the project and the possible use of larger turbines. Whilst AGL may think these turbines are more “efficient”, they will also be much more visible on the pristine hills of the Barrier Ranges. One of the attractions of Silverton to tourists is the iconic Barrier Ranges and the views from the higher points of the town and the Heritage Walking Trail. When told about the proposed wind farm, many tourists have commented that they would not return to Silverton if the project went ahead as it would ruin the pristine views of the area and the heritage integrity of the town.

f) **No change to scope:** There is no change to the scope of the Project. A further delay to the Project does result in a level of ongoing uncertainty for the local community, however the environmental impacts of a further delay would be minimal. The extended lapse date would enable a review of the project, and if required, a more substantive modification which would include a full environmental assessment of any modifications to the project scope.

Again, the above statement (f) shows a total disregard for the Silverton Community. AGL admits an extension to the project “does result in a level of uncertainty for the local community”, but is more interested in convincing the Department of Planning and Environment that the environmental impacts of an extension will be minimal. The Silverton Community have put up with AGL’s total disdain for too long. It is obvious from the tone of meetings and discussions with AGL that the company sees the people of Silverton as a thorn in their sides which should be removed at all cost. Of course the local community feels uncertain if a further extension is granted. For eight years we have been putting our lives on hold to some extent, wondering, if we invest in our homes or businesses will we recover that investment if we decide or need to sell. Will any of us suffer the health effects being experienced by others living close to wind turbines, will the project have an economic effect on our small town which survives solely on tourist trade. An extension to this project would intensify the current feeling of uncertainty in the community.

The second part of statement (f) again says to me that AGL have not fully decided on the size and scope of this project and again, appear to be keeping this from the

**Silverton Community. If “the extended lapse date would enable a review of the project, and if required, a more substantive modification which would include a full environmental assessment of any modifications to the project scope” means that AGL are in fact looking to change the project in any way, shouldn’t AGL be asked by the Department of Planning and Environment, at this point in time, exactly what AGL’s plans are for this project, insist on a full review of the project and request a new development application be lodged? The statement “no change to scope” is, again, misleading. Clarification is essential.**

**AGL sites savings in water consumption as part of the importance of the project. The statement; savings in water consumption of approximately 730 million litres per annum of potable water (this is the amount of water required to produce the same amount of electricity from coal-fired power stations) is a misleading statement. I presume this is the amount “saved” after the construction phase of the project. Whilst the operation of a wind farm may require little water, a massive amount of water will be required to build the Silverton Wind Farm project. The Broken Hill region is currently experiencing a critical lack of water, with no relief in sight. This is not the first time over the life of this project that this region has suffered critical water shortages, yet AGL is determined to press on with this project, again showing a total disregard for Silverton and surrounding communities, which are dependent on the remaining water supply, in favour of any financial gains for the company. The whole region is adhering to strict water restrictions to extend the remaining water supply as long as possible. It would be irresponsible to allow an extension to a project which may jeopardise the water security of the entire area.**

**Again, under Importance of the Project, AGL claims the project will be responsible for “Improvements to local infrastructure”. Clarification is required here. I am not aware of any discussions with the community or the Silverton Village Committee Inc. regarding infrastructure. In fact, any changes to the infrastructure of Silverton would be viewed very seriously due to the heritage nature and significance of Silverton. The Silverton Village Committee Inc. has a draft Heritage Plan for the Village which aims to keep Silverton the unique village it is now. Indeed, the rustic, simplistic, sparse beauty of Silverton is what brings tourists to the Village. It should be noted that Silverton is the birthplace of BHP. The ruins of the original Silverton Hotel (DeBaun’s Silverton Hotel) located behind the current Silverton Hotel, is where the meetings of the Syndicate of Seven took place which formed the company Broken Hill Proprietary Ltd. The documents were printed in**

Silverton and indeed, the claim for the lease lodged at the Surveyor's Office in Silverton, which still stands today.

Silverton is also the home of the first privately owned railway in Australia. When neither the NSW or SA governments would connect the rail line from the SA border to the Broken Hill mines, five Silverton businessmen formed the Silverton Tramway Company so the ore could be transported from Broken Hill to the smelters in SA. The BHP mine and this railway helped fill the NSW treasury for many years. It is ludicrous to think that the NSW Government could now allow this history to be wiped away in favour of a more modern form of industry which I doubt very much will stand the same test of time.

### **Importance of the Project page 3**

Protection and improved management of sensitive local biodiversity including the tawny rock dragon and a previously unrecorded spinifex ecological community

**I find AGL's lack of understanding of their own studies appalling and disturbing. It is obvious that AGL commission people to do studies on their behalf, but then pay no attention to the results. The main aim is obviously to get the EA approved. If no one questions the contents of the study, then AGL won't either. The initial studies on the Tawny Rock Dragon (*Ctenophorus decresii*), commissioned by Epuron in the original EA, were mainly desktop studies. AGL have since commissioned its own studies and in 2013 it was discovered ( McLean, Sass, Moussalli & Stuart-Fox 2013), that the lizard which had been studied since the start of the project, is in fact, the Barrier Range Dragon ( *Ctenophorus mirrityana*), a new species. Although the Barrier Range Dragon has now been listed as endangered in NSW with the Department of Environment and Heritage, I cannot find any evidence to show that AGL have undertaken any further studies about this lizard which may provide valuable information into the management of this species. It would appear all AGL have done is change the name of the lizard on the studies. It is interesting to note that AGL have, however, listed the wrong name on the Silverton Wind Farm Request for an Extension of Lapse Date (Mod 2) document. If AGL cannot even get the name of the species right ( and I might add that it is shown by McLean 2013 that the Tawny Rock Dragon does not even exist in the Barrier Ranges. It is only known to occur in SA.), then how can AGL manage the safe, ongoing existence of any of the endangered species of flora and fauna which have been identified on the wind farm site. If AGL is ignoring the information provided by the experts they commissioned, then who will be placed in charge of this "management" they speak of and what form of "management" will be undertaken. The Office of Environment and Heritage list one of the main threats to the Barrier Range Dragon( Barrier Range Dragon- profile. Threats.**

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<http://www.environment.nsw.gov.au/ThreatenedSpeciesApp/profile.aspx?id+10188>) as “Inappropriate land management practices and/or change in land use on leasehold properties due to economic incentive”

*Impacts on Community/Acceptability of Delay*

AGL has continued its engagement with the local community via Silverton Wind Farm Community Consultative Committee (CCC) meetings and regular meetings with the Lease Holders, the Land Owner, the Silverton community and the Broken Hill community.

Community consultation has been undertaken to update community members, addresses issues of concern to the community and provides an opportunity to incorporate community feedback.

In preparing the EA for Mod 1, AGL carried out a survey of the lease holders and the Silverton community regarding the perceived impacts of project delay. Most respondents expected a low impact on tourism, local business and farming. The Mod 1 EA found that no mitigation measures, additional to those required by the project approval, were considered necessary to manage the impacts of the delay on the community.

In order to assess the potential impact of a further 5 year delay of the project on the community, AGL has planned to undertake community consultation in the Silverton community in February 2016. Initial consultation will be conducted with leaseholders of the Project area, followed by consultation with the broader Silverton community. More detailed community consultation will be undertaken as part of a more substantive modification application.

AGL is of the opinion that the impacts on the community as a result of the delay imposed by a 5 year extension would be minimal. Further, the community still stands to benefit from the Project.

**This whole section (above) is misleading and insulting to the Silverton Community. This continued engagement with the community, happens when it suits AGL. Some of the members of the Community Consultative Committee, including myself, have requested that we maintain regular meetings with AGL. At the CCC meeting in Silverton February 25<sup>th</sup> 2016 (the meeting prior to that was Thursday July 2<sup>nd</sup> 2015. Very regular meetings called by AGL), I asked if we could keep the meetings monthly so AGL could keep us up to date with the project. The March meeting was postponed due to the busy period for business operators in late March (St Pat’s Races and Easter). This was agreed upon only by a couple of business holders, but it was marked down by AGL that the next meeting would be held in April, possibly the 14<sup>th</sup>, to be confirmed. I have since emailed Ms Helena Orel (Community Stakeholder Engagement Manager) requesting that the April**



meeting be held on the 28<sup>th</sup> April after discussions with some community members that this date would suit them better. I again note that the community has not been supplied, by AGL, with minutes from the February 25<sup>th</sup> 2016 meeting and I have not received a response to my email request.

There was no community consultation with the Silvertown community in February other than the CCC Meeting on February 25<sup>th</sup> 2016. There was certainly no consultation regarding the impacts of a further 5 year extension, only the announcement that AGL had lodged the application.

In regard to the survey carried out by AGL in preparation for the EA for Mod 1 to the project. Most of the community responded that there was not likely to be any major impacts on tourism during this period, because we were under the impression the project was on hold and no work would be carried out on the project. Therefore, if nothing is happening, no one is going to be impacted by the project. AGL uses this information as a positive for the Silvertown Wind Farm project, when in actual fact, it was a positive for the community. Whilst AGL were not present and nothing was happening in regard to this project, tourism went on as normal, as did all our tourism related business.

AGL's opinion that the impacts of a further 5 year extension to the project on the Silvertown Community will be minimal, are wrong. How did they arrive at this conclusion? At this point in time, they have not consulted with the community and they had lodged the application for the extension before the community even knew about it.

At the last CCC Meeting in Silvertown 25<sup>th</sup> February 2016, I asked if everyone who owned land or lived in Silvertown had been notified by AGL that the meeting was to be held on that date. The response from Ms Helena Orel (Community Stakeholder Engagement Manager) was that she had not notified everyone, only those on the email list were notified. Those residents and land owners of Silvertown who do not own a computer, or are not on the email list, therefore, were not notified of an important meeting, where very important information for our Community's future was announced. One wonders who will actually be contacted to take part in the consultation process to ascertain the impacts this 5 year extension will have on our community. After all the other monumental blunders this company has made over the years, I wonder if the Community Stakeholder Engagement Manager can actually engage with the stakeholders who will have to live with this project on their doorstep, other than those in Broken Hill 25 kilometres away who have vested interests in the project. Perhaps AGL can get this right so that their "opinions" on how our community feels about this project can be replaced by fact.

**What evidence has AGL produced to prove that “the community still stands to benefit from the project?” AGL’s idea of benefits and the Silverton Community’s ideas are poles apart. AGL has no right to claim this community will benefit in any way from this project. This community has tried on numerous occasions to compromise with AGL on turbine placement, asking that, of the 282 approved turbine sites, AGL use the sites the furthest away from the township of Silverton and any residences. The answer has been a straight out, resounding “NO” at each discussion. The only reason given is the turbines will be placed where the best wind resource is. To me, that translates to: AGL is here to make money and we don’t care what the community thinks or what impacts our project has on any member of this community.**

**I would have thought that if 282 turbine sites had been identified and approved, then all the sites should have an acceptable wind resource. We, the community, thought that if we could compromise on turbine placement, then we could possibly live with this project. However, the information contained in the Request for Extension to Lapse Date February 25<sup>th</sup> 2016, indicates we are dealing with a company that is sloppy in its research and business practices. AGL has constructed a number of wind farms around Australia and the evidence is now in the public domain (such as the Hansard Senate Select Committee on Wind Turbines 2015, Victorian Civil and Administrative Appeals Tribunal 2012) that AGL has no concern for the communities it inflicts itself upon. It is my opinion that AGL should not be granted an extension to the Silverton Wind Farm Project so that it can wreak its havoc on yet another innocent community.**