

Submission to the Jupiter Wind Farm EIS on Public Exhibition

Unsuitability of the project area

Thank you for the opportunity to provide a submission to the assessment of the proposed Jupiter Wind Farm currently on Public Exhibition. I oppose this proposal as a resident of the Mulloon rural subdivision whose property boundary is a few hundred metres from the proposed placement of wind turbines, and whose dwelling on the property is 1.3 kilometres from the nearest turbine position. The impact of this proposal on my visual amenity, on my rural aesthetic, on my lifestyle and land use would be extremely high. Unacceptably so. There are three hundred residences within 3 km of this proposal, the suggested area of high impact. There are many more dwellings within 5 km of this proposal. I am not alone in my opposition. This submission concentrates on incompatibility of rural sub divisions and wind farms.

The Current Situation

With huge government handouts to be had, wind farms are an investment offering big returns. Anyone can form a wind farm company. A site is selected based on the willingness of hard pressed farmers to sign agreements for a yearly rental. Get a collection of these contracts and you have a wind farm proposal. Simple. More than a handful of turbines and its state significant, falling under legislation geared to passing through such developments as highways and airports. But there is no tender process in this case. Indeed, the proponent does not even have to demonstrate that alternative sites have been studied. Submitting an EIS does not even require a finalisation of turbine placement, size or type. Allowing a post approval free-for-all of micro siting and modification. A free-for-all that can make redundant all prior project assessments.

Once the proposal is developed and an EIS is submitted, there is the danger that the inherit assumption of merit defeats objectivity. It's a wind farm, it must be good.

My submission is based on the premise that not all localities are suitable for wind farm development.

The proposed Jupiter Wind Farm should be rejected on the grounds that it is not a suitable location. The land use of the area surrounding the PA is emerging rural residential. The negative impact of this project on the surrounding community would be unacceptable in both its extent for each individual, and the sheer number of individuals that would be impacted. The area around the PA has developed robustly along the path of rural lifestyle block and rural residential.

A wind farm is not in keeping with the aesthetic of the inhabitants and the dominant trend of land use.

Sydney-Canberra Corridor Regional Strategy 2006-31

The proposed Jupiter Wind Farm is located in an area defined by the Sydney-Canberra Corridor Regional Strategy 2006-31 as containing a mixture of farmland, rural townships and rural sub development. All three elements are described as being important and valued elements of this region.

The Regional Strategy examines the unique nature of the area between Sydney and Canberra and “represents an agreed NSW Government position on the future of the Sydney–Canberra Corridor. It is the pre-eminent planning document for the Sydney–Canberra Corridor”

“The primary purpose of the Regional Strategy is to accommodate and manage growth while ensuring that the rural landscapes and environmental settings that define the Region’s character are not compromised... “. Implicit in this document is the recognition of the right of what is already in place, and the inherit value of the rural sub developments. With reference to rural sub developments, the Strategy states “Rural lifestyle housing is now an established and significant land use in many parts of the Region” and “The volume and flow of goods, people and ideas represents a significant economic advantage for the Region”

The Regional Strategy, while understanding that the area is likely to be desirable for wind farm development, also clearly understands that there is a non-compatibility between rural sub development and wind farms “It will be important that local planning for wind farms as well as other rural land uses recognises the need to reduce conflict with existing communities, recognises and protects key landscape features” .

According to the Strategy, existing communities need to be protected from wind farms. They pre-exist, legitimately, legally and desirably. They are important economically. The strategy clearly highlights the incompatibility between wind farm development and rural life style blocks and rural sub developments. They cannot coexist in close proximity.

“The key rural land challenges are to...maintain the rural character and diversity of land values across the Region, whilst acknowledging competing uses of rural land”

In the 2010 update of The Regional Strategy, the Palerang council area has the highest annual growth rate at 3.47, significantly higher than surrounding areas including Queanbeyan and the high growth area of Yass.

So, a document that represents the “NSW Government position on the future of the Sydney–Canberra Corridor” and is the “pre-eminent planning document for the Sydney–Canberra Corridor Region” clearly identifies the “conflict” between rural sub development and wind farms.

The Strategy clearly places emphasis on protecting what already exists. The Strategy clearly places responsibility to avoid this conflict on the planning authority.

The Jupiter Wind Farm proposal creates such a conflict. The proposal places 88 turbines in close proximity to approximately three hundred houses, many homes being closer than two kilometres. The NSW Department of Planning has refused to clearly provide a numeric limit to how close turbines can be placed to residential homes, allowing for yet another free-for-all. Turbines are being proposed 1.3 km from my dwelling and 500 metres from the border of my property. There are other residences even closer.

The placement of turbines in the Jupiter proposal demonstrates a complete disregard for the residential homes that surround it. The southern precinct is five kilometres from the northern precinct. It runs through the heart of the Mulloon subdivision, and impacts hundreds of homes surrounding it. Turbines are as close as 1.1 km from homes. The southern precinct is 24% of the project area and is surrounded by 34% of the residences within 5 km of a turbine. The southern precinct’s total contribution to power production for the project is 15%. A high price for a small return.

Elsewhere in the project area, residential homes are engulfed by large numbers of turbines. Homes look over vast vistas of turbines, replacing the existing panoramic view and destroying it. One resident in the northern precinct informed me that they will be able to see over 60 turbines. They were very angry. There are many other residents in a similar position.

The newly released guidelines refer to 3 km as the area of high impact. The draft guidelines referred to 2 km. The high impact zone grows with the increasing height of turbines. None of these indicators have been used by the proponent to determine turbine placement.

The complete disregard for the impact on residents can be seen in the southern most section of the southern precinct. The Office of Environment and Heritage requested the removal of turbines from sensitive bushland areas. The proponent happily moved the turbines as requested, and placed them closer to the Mulloon sub development. As a result I will now see two groups of turbines from my residence, as will everyone else in the area.

Turbine placement has not taken the presence of homes into account. The proponent has not deemed that as necessary.

The nature of the area surrounding the PA has not been taken into account. The proponent has not deemed that as necessary.

The conflict, recognised in the Regional Strategy document, is not recognised by the proponent.

This conflict is recognised by the property owners surrounding the PA.

They do not want this wind farm.

Emerging Rural Residential

Palerang local council stated that their policy was that wind farms ***should not be established in high rural residential areas, such as where the Jupiter Wind Farm is proposed.***

This has been firmly restated by the current administrator of the newly formed QPRC.

The NSW Department of Planning rejected the proponent's first EIS on three grounds. The third was that the proponent had

“not fully considered the compatibility of the project with local planning controls and the emerging rural-residential nature of the area”.

Both the state government and local government recognise that the area surrounding the Jupiter Wind Farm Proposal is increasingly rural residential. The main land use trend in the area is rural subdivision. The area has a defined character, and will continue to expand in this area. A wind farm is in conflict with this type of development. You cannot have both.

Rural Sub Development: The lifestyle block and rural residential

Land Value

This submission will not dwell on the impact of wind farms on land value. The two main studies that have so far been completed, the Preliminary Assessment of the Impact of Wind Farms on Property Values (NSW Valuer General 2009) and the more recent report Review of the Impact of Wind Farms on Property Values, by Urbis, both make it clear that as yet there is insufficient data to draw definite conclusions. However, it is worth mentioning that both documents state that the most likely land use type to be negatively impacted is the rural lifestyle property, as it is largely bought for aesthetic purposes, and rural residential properties, because of the denser population. The 2009 report includes an assessment by Hives, 2008, that states “Properties benefiting from turbine leases increased in value. Rural properties were unaffected. Some detrimental effects were evident on lifestyle properties.”

Proximity to a wind farm plays a major factor

“Discussions with local agents suggest that the wind farm has deterred some buyers. Agents generally reported that the number of potential buyers decreases the closer a property is located to the wind farm.”

In the Review of the Impact of Wind Farms on Property Values, 2016, URBIS

“Whilst evidence to support these effects in the present Australian context is somewhat limited, the following factors are worthy of consideration:

Proximity to residential dwellings – Issues surrounding noise, shadow flicker and close visual impacts are likely to be exacerbated if wind turbines are

located close to residential dwellings, and therefore any such perceived diminution of residential amenity has the potential to influence property values.”

“In our professional opinion, appropriately located wind farms within rural areas, removed from higher density residential areas, are unlikely to have a measurable negative impact on surrounding land values.”

“There is limited available sales data to make a conclusive finding relating to value impacts on residential or lifestyle properties located close to wind farm turbines, noting that wind farms in NSW have been constructed in predominantly rural areas.”

In conclusion, the studies done on the impact of wind farms and property values agree that rural lifestyle blocks and rural residential areas are most likely to be negatively impacted, and should therefore be avoided.

Particularly as wind farms built in rural areas that are not in close proximity to rural sub developments, do not have a negative impact on property values.

As farms with wind turbines tend to increase in value, due to the addition of revenue derived from them, a wind farm placed in close proximity to rural sub developments could be seen as a form of asset transfer. Even a form of legally endorsed theft.

The Rural Lifestyle Values and Aesthetic

“Hives (2008) concluded that lifestyle values had the greatest potential to be affected as a large part of their value is typically derived from the aesthetic qualities of the surrounding environment”

People who choose to live on a rural lifestyle block or rural subdivisions have a set of values and an aesthetic that is both unique to the individual and the particular area they have chosen to live, and yet conforms also to a larger shared set of values and aesthetic.

These values differ significantly from those held by a person whose main land use is income driven. This set of values differs vastly from those held by those living in an urban environment.

- A high value is generally placed on the visual. The distant view over mountains and the immediate view of the Australian bush.

- It includes the sounds and smells of the bush
- An appreciation of native flora and fauna and the conservation of habitat
- A high value is placed on what is naturally occurring. What belongs and fits with the landscape
- Commonly, houses and gardens seek to blend with the natural environment.

A wind farm is alien to this aesthetic. It is industrial in nature. The sheer size of a modern wind turbine means that it dominates the landscape, replacing the nature of the existing with something that is not just different, it is the opposite.

The EPA define offensive noise by its loudness, its duration, whether it is in keeping with the type of noise in the area, and the number of people affected.

If we borrow the EPA's definition for offensive noise and apply it to Visual Amenity, we find a close parallel to the high negative impact of a wind farm on the visual landscape.

Loudness - the sheer size of the visual impact. At 175 metres turbines are 40 metres taller than the Sydney Harbour Bridge. Add the fact that in this proposal there are 88 turbines, and that their movement attracts the eye. It is clear that they dominate the landscape visually, and have a loud visual impact.

Duration - Operating 24 hours a day, seven days a week with no 5 pm shut down and no closures on weekends and public holidays, a wind farm is permanent. The life expectancy of a turbine is 30 years. Perhaps longer if decommissioning fails to take place.

Is it in keeping? Tall industrial structures are out of place in the rural aesthetic. They do not belong. This heightens the visual impact as they are more noticeable. It increases the negative impact, as they take away what is valued, and replace it with something that is not.

Numbers - The more people affected, the worse the impact is.

Rural Land Use

Things are different in the country. We don't just live in our houses and backyards. Our properties are places of recreation. Whether it be walking,

horse riding, working, entertaining. They are both our public and our private space. The EIS assesses proximity to wind turbines from people's residences, ignoring our ownership of our entire property. My dwelling is 1.3 km from the nearest turbine. At my boundary fence, I am a few hundred metres. Does the EIS suggest that I no longer have the use of my property, and henceforth am to be confined to my house and 2 acres? That would mean I lose the use of 98% of my acreage.

Photomontages taken from one vantage point are meaningless in this context, and so is the distance from my dwelling. No one has consulted me on how I use my block, on where I spend my time. The EIS is based on false assumptions, a situation resulting from inadequate consultation and a failure to understand the rural community.

Mitigation measures suggested, laughable in themselves, are even more ridiculous in this context. A line of trees does not stop visual impact once you walk round them, to the side of them, or through them. We don't stand in one place. We don't just live in our houses.

Dual Occupancy

Many rural lifestyle blocks have dual occupancy entitlements. This entitlement increases the value of the land. Building a second house provides a supplementary source of income. In most cases, including mine, any second dwelling would have to be placed in closer proximity to the wind turbines. The measurement to the wind turbines should be from my property boundary at the nearest point to the turbine. Less than five hundred metres.

Conclusion

The proposal for the Jupiter Wind Farm should be rejected.

The Sydney-Canberra Corridor Regional Strategy 2006-31 is clear on the need to avoid the conflict between wind farms and rural sub developments. The Strategy states that the existing rural sub developments are of value and need to be protected. That protection is to be exercised by local planning authorities. Both the NSW Department of Planning and Environment and the local council concur that the area surrounding the PA is emerging rural residential. It is widely understood that rural sub developments are not compatible with wind farm development due to the rural aesthetic, the high

visual impact, and the increased number of people exposed to these negative impacts.