



Tarago and District Progress Association Inc.

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Assessing Officer
Department of Planning and Environment

Jupiter Windfarm Proposal Development Application (SSD 13_6277)

Response to EIS

The Tarago and District Progress Association (TADPAI) appreciate the opportunity to comment on this Development Application and the EIS.

We object to the proposal.

We request before the Development Application is assessed that EPYC resolve the issues described below to the satisfaction of the community.

Background

The area surrounding Tarago is home to a range of renewable energy projects including Capital Windfarm, Woodlawn Wind Farm, the Veolia Woodlawn Bioreactor and the almost operational Veolia Mechanical Biological Treatment facility. The first of the renewable energy projects started in 2004 with the application for the development of the Veolia Woodlawn Bioreactor. These facilities are located to the west and south of Tarago, with the proposed Jupiter Wind farm to the south east.

The residents of Tarago and surrounding areas have for many years tried to maintain a country lifestyle while dealing with issues caused by the provision of renewable energy on an industrial scale, including unintended consequences of ongoing operations, as well as regular modification work, requiring development application, community consultation and approval. It would be fair to say that the residents of Tarago and the surrounding area have taken on more than their fair share of inconvenience with regard to renewable energy.

In meetings held on the topic of the Jupiter proposal, including the meeting organised by the Department of Planning, the overwhelming view was that the majority of the community do not support the proposed Jupiter Wind Farm.

Community Issues with the proposal

Visual Impact

Number of residential properties close to the windfarm is the highest number for any wind farm proposal lodged with the Department of Planning. The issue that residents have identified as one of the biggest issues is the visual impact. Residents have moved to the area to enjoy a country lifestyle and the view from their property is one of the most valued attributes. Adding a large number of turbines to each person's view is considered to destroy that valued asset.

The mitigation techniques nominated in the EIS are to plant trees on the impacted property to hide the turbines from view. The view suggested by the proponent as the most important is the view from the house, and the solution is to plant the trees near each house. The two obvious drawbacks are that the trees will take years to grow to provide the necessary coverage, and they will be a bushfire risk, being close to the house.

The wind turbines have been stated to be a maximum of 173 metres tall which would be just less than 50 metres taller than the turbines originally built at the Capital Windfarm.

The visual impact is that we have a large number of residents very close to some very big turbines.

Options for reducing the visual impact that have not been considered by EPYC are:

- using wind generators that are smaller than the ones proposed, such as the Invelox 2.2 Mw generator at 30 metres tall, recently commissioned in China (see PacificWind NZ <http://pacificwind.co.nz/>) or
- moving the proposed windfarm to another location that is less densely populated, but still close to the 330kv transmission lines, such as the Morton National Park. As an example, the Grasmere Wind Farm in Albany WA is located within the Torndirrup National Park.

Community Consultation

The EIS presents very little information that is final. The turbine locations have been published, but as always there is a caveat that the locations could change. The size of turbines has been stated to be a maximum of 173 metres. but again, the size could change EPYC advise that they have a benefits sharing scheme, but the qualification criteria or available benefits have not been specified. EPYC say they will have a Community Enhancement fund, but the details have not been documented

Information dissemination from the Jupiter CCC has been the same, as from within the EIS, nothing is final, and details of the benefit sharing scheme were not disclosed.

The EIS doesn't provide details of the outcome of discussions with non-hosting landholders. How many have been approached, how many have agreed to accept a benefits sharing proposal (and what conditions were placed on those landholders), how many decided not to enter into an agreement, and how many could EPYC not contact. The information about take up rate for the benefits sharing scheme will give an indication about the fairness (in the view of the landholders) of the scheme.

It seems that the lack of final information may be designed to impede the effectiveness of the Public Exhibition Period. It is almost impossible to mount a coherent argument against a document that is does not contain all of the relevant information. The Planning process doesn't seem to cater for the situations where the proponent presents an EIS without all of the details finalised, as the updated EIS is unlikely to be presented again for Public Exhibition (even though it should).

Decommissioning plan

EPYC have offered to create a Decommissioning Fund, but have not put an estimate on the size of the fund, as the expected costs in 25 years cannot be estimated. Therefore, TADAPI would like the decommissioning fund to be an amount not less than \$200,000 per turbine, with increases in line with CPI rises calculated every year. The funds should be held in a Trust Account, as a safeguard against EPYC or its successors becoming insolvent.

Additional information required before the EIS goes to Determination

TADPAI request that 2 additional investigations and reports be added to the EIS.

1. Cost benefit analysis of moving the proposed windfarm to within the boundary of a National Park, so that no residential block is within 5 kilometres of a wind turbine.
2. Cost benefit analysis of other methods of generating an equivalent amount of renewable energy (wind, solar or other), at the currently proposed site, without the use of wind turbines over 100 metres tall. This report should contain a detailed analysis of the performance of various systems at low wind speeds when compared to the proposed 173 metre turbines (if any other wind generation systems are analysed).

The Community Enhancement Fund suggested by EPYC, should be specified in more detail in the EIS, and should contribute an annual amount agreed by the Jupiter CCC, with increases in line with CPI rises calculated every year, to the local community to benefit those affected by the development.

The Resident's Benefits Sharing scheme qualification criteria and benefit amount needs to be specified in the EIS, and the scheme must apply to all impacted residents, rather than to those residents who have foregone their rights to lodge an objection to the Jupiter proposal.

The Residents Benefits Sharing scheme must compensate those most impacted by the proposed development by providing a payments scale based on the Resident's home proximity to the nearest Wind turbine. Residents who have already signed Benefits Sharing agreements with Jupiter must not be disadvantaged when the new agreement comes into force. The Residents benefit Sharing Scheme payment scale must be agreed by the members of the Jupiter CCC

Summary

TADPAI is pleased to have the opportunity to provide a response to the EIS submission, and we would appreciate an opportunity to comment further once the additional information requested above has been provided.

If you have any questions about this submission., please contact Neil Shepherd by email at tadpaisecretary@gmail.com



Neil Shepherd

Tarago & District Progress Association Inc Secretary