



**GLEN INNES
WINDPOWER**

Level 5, 39 Martin Place
Sydney, NSW 2000
Tel: (02) 9199 4800
www.onewindaustralia.com

Toby Philp
NSW Department of Planning and Environment

August 13, 2014
By e-mail

Dear Toby

Glen Innes wind farm – modification 3 – response to submissions

Glen Innes WindPower Pty Ltd (GIWP) have reviewed the submissions made as part of the exhibition of its Mod 3 application in July 2014, and provide the following response to the NSW Department of Planning and Environment (NSWDPE).

The NSWDPE received a total of twelve (12) objections to GIWP's Mod 3 application, as follows:

- one (1) objection from the "Landscape Guardians", which was submitted on behalf of the organisation by Mr Geoff Putland, Ms Suzanne McAlary, Dr Ashley Peake and Mr Phil Evans;
- four (4) objections from Mr Geoff Putland, in various capacities;
- one (1) objection from Dr Ashley Peake, a resident of Queensland, in his personal capacity;
- one (1) objection from Ms Suzanne McAlary, a resident of Queensland, in her personal capacity;
- one (1) objection from Mary Anne Evans, in her personal capacity, and
- a total of four (4) objections from Christine Thomson, Frank Laudari, Lindsey Hutchinson and Veronica Rooker, all residents of Queensland.

GIWP notes that all twelve objections all use the same form letter prepared by the Landscape Guardians. We wish to highlight that we believe one of the objectors to have a conflict of interest, and for NSWDPE to consider that when assessing the veracity of the objections.

We highlight that Mod 3 refers to a lapse date extension of an already approved project. This modification in no way changes the current project. As a result, points raised by the Landscape Guardians in relation to the already approved project are misplaced and are not dealt with here in great detail.

The Landscape Guardians' form letter addresses and repeats some key points. In order to provide clarity and coherence in GIWP's response to those submissions, we have separated out the key concerns put forward rather than respond to each individual point in turn. We have also aimed to respond to NSWDPE's own questions regarding the project development as part of this response.

Please let me know if you require any further information, GIWP is committed to working closely with the NSWDPE.

Yours sincerely,

Dr Paul Stangroom

Glen Innes WindPower Pty Ltd

GLEN INNES WINDPOWER PTY LTD

ABN 83 105 607 538

GIWP response, separated by Landscape Guardians key points

GIWP has separated the Landscape Guardians' submissions into a list of key concerns and responded to each individually. These responses also link to separate questions from NSWDPPE on similar subjects.

1: GIWP's 2013 extension request

Some of the Landscape Guardians' objections are intended to imply that GIWP misled the NSWDPPE in its letter dated 26th July 2013 regarding the justifications for granting an additional extension of the development approval for the Glen Innes project. All statements made by GIWP in that letter were true at that time and GIWP believed in good faith that the project would progress without an additional extension or modification being necessary.

2: Approval date already lapsed

This point has been dealt with under NSWDPPE's assessment of Modification 1 in August 2013, which clarified that the lapse date was counted from the date of the Court approval rather than the Minister's original 2009 approval (which was superseded by the Court approval). Therefore the approval has not already lapsed and GIWP can seek a modification.

To clarify the dates, GIWP notes that the wind farm was originally approved in 2009, but was then appealed, and a new 3 years approval provided from the Land and Environment Court on August 18th 2010. This was extended for 12 months in August 2013 through the approval of Modification 1 by NSWDPPE, and currently runs until August 18th 2014, a total of 4 years.

Contrary to the Landscape Guardians' position, it is nearly 4 years since the Glen Innes development approval commenced. During that time GIWP has steadfastly pursued development of the project and has taken significant steps toward project completion, all while continuing to comply with the applicable conditions of the approval. Unfortunately, circumstances beyond its control necessitate GIWP to request an additional 12-month extension of the lapse date contained in condition 1.5 of approval until August 18th 2015, taking the total length of the overall approval up to 5 years.

The extension sought to extend the lapse date to 5 years from the original approval date is consistent with approvals recently given to other wind farm projects (e.g. Flyers Creek, Collector, Bodangora, White Rock, Capital II).

3: Compliance with wind farm guidelines and 2km setback

GIWP do not consider this material to the modification application. We are not considering changes to the layout. We are seeking an extension to the lapse date for the project as currently approved. NSWDPPE's assessment of Modification 1 identified that the 2km setback was not a material consideration for the assessment of Modification 1, and this is therefore the case for the current Modification (No. 3).

4: Compliance with Council DCP

Glen Innes wind farm is a Part 3A major project development and as such is not specifically required to consider DCP's. Notwithstanding this, the time extension modification (Mod 3) does not deal with any changes to the wind farm project. It is seeking an extension to the lapse date of the project as currently approved.

5: Wind farm does not have community support

The Glen Innes wind farm has strong community support, as demonstrated by the small number and repetitive nature of objections received by the NSWDPPE. Mr Putland and the Landscape Guardians' associates (six (6) of whom live in Queensland) do not represent the views of the Glen Innes community at large.

Moreover, the wind farm was approved following a rigorous assessment process, including Land and Environment Court proceedings which took into account objections lodged by the Landscape Guardians and other objectors.

With Modification 3, GIWP simply seeks to extend the lapse date of the wind farm's approval to 5 years from the original approval date, which is consistent with approvals recently given to other wind farm projects (e.g. Flyers Creek, Collector, Bodangora, White Rock, Capital II).

6: Wind farm is not viable

The Glen Innes wind farm is absolutely viable, but as with any infrastructure project, the wind farm requires a level of regulatory certainty to secure bank and equity financing. Last year's change in the federal government, with the accompanying cries to abolish or materially curtail programs related to renewable energy, as well as the review of the Renewable Energy Target (RET) in 2014, have caused well-documented uncertainty in the industry. Not surprisingly, no wind farms have entered construction in Australia since the Coalition government's election. Indeed, across Australia, renewable energy investment declined from \$2.7 billion in 2013 to just \$40 million in the first half of 2014 based on data from Bloomberg's New Energy Finance study, released in July 2014. The situation is not expected to improve until the future of the RET is settled and investors (both banks and equity investors) regain some level of confidence.

While it is generally expected that a RET will remain in place following the review, contrary to the Landscape Guardians' position, nothing is certain at this time. Specifically, little if anything is known about the expected format, size and duration of the future RET.

The Glen Innes wind farm project has a strong grid connection option, good wind speeds, committed landowners, and enthusiastic proponents. Modification 3 is not a statement about the wind farm's viability, but rather a function of the current uncertain regulatory environment that affects all similar projects across Australia.

7: Status of negotiations for ordering wind turbines

The negotiation process behind any infrastructure project is commercially sensitive, and the details of negotiations are not meant to be aired in a public forum. As a result, GIWP provides certain information here related to our negotiation process, and has provided additional information to NSWDPPE in a private letter for their consideration.

As highlighted in our Mod 1 letter, in July 2013 GIWP was in final stages of negotiating an order for wind turbines which would fit within the envelope of the original approval, with a tip height of 130m. An EPC (engineering procurement and construction) offer had been presented, and we were in negotiation with a reputable manufacturer regarding the contract details. Negotiations were important, as the economics of the original planning envelope were good but not optimal. Comparatively smaller rotor wind turbines are slightly older technology, and not as efficient as more modern machines at extracting energy from the wind.

During negotiations, the manufacturer advised us on their pricing structure for a larger rotor turbine option, with indicative energy yield predictions. The difference made a fundamental improvement to our financial model, and after discussion with our environmental consultants, we decided to apply for a modification to our approval to allow for the additional turbine height. Thus the original negotiations were put on hold while we worked on the modification (Modification 2).

Modification 2 was first discussed with NSWDPPE in October 2013, with an EA submitted initially in December 2013, and an updated EA in March 2014. We await a decision on Mod 2, and until that point, we cannot sign a contract for wind turbines, as we do not know which turbine size we will be able to buy.

We have an offer for the larger wind turbine option, we have an EPC contract, technical specification and warranty documents semi-negotiated, but we are unable to complete this process. We also note that the original negotiation for the smaller rotor version of the turbine can be reopened if required.

8: Relevance of proposed modification 2 (tip height variation)

GIWP's other modification (Mod 2) under consideration by NSWDPPE is not a material consideration to this modification. This current modification (Mod 3) is seeking an extension to the lapse date for the project as currently approved and is required regardless of whether Mod 2 goes ahead. Mod 2 is subject to separate merit assessment by NSWDPPE.

The project is viable without the approval of Mod 2, but the energy yield from the project will not be as high, and so the overall benefit of the project to all stakeholders is reduced. Mod 2 focuses on using the latest technology, as wind turbine have changed considerably in the 4 years since the original approval was provided. In fact the wind turbines considered in the original approval are no longer available on the market. Mod 2 brings that newer and more efficient technology into the project and would make Glen Innes a leading example of modern wind energy technology in Australia.

9: Status of Power Purchase Agreement (PPA) negotiations

As also highlighted in our Mod 1 letter, prior to last year's government election, GIWP was confident that a power purchase agreement (PPA) could be signed for the project with one of the major retailers. However, as the election neared and the Liberal party amplified their promises to abolish or materially curtail a large number of the clean energy focussed policies and to reverse anything to do with climate change (see for example <http://reneweconomy.com.au/2013/renewables-fear-the-worst-as-tony-abbott-targets-clean-energy-22671>), the energy retailers assumed a wait and see approach and GIWP's PPA negotiations stalled. Once elected, the new government targeted the Carbon Tax, and then ARENA (Australian Renewable Energy Agency) and the CEFC (Clean Energy Finance Corporation), two key bodies providing financial assistance to renewable projects. With respect to the RET, which was always subject to being reviewed in 2014 by the Climate Change Authority, Mr Abbott complicated the situation by forming his own review panel headed by Mr Warburton.

For commercial reasons that are not relevant here, retailers prefer not to sign long-term fixed-price PPAs and are using the Liberal government's policies and the resulting regulatory uncertainty to justify not negotiating for any new PPAs. It is for this reason that no wind farm PPA's have been signed in Australia since 2011, and why only a few wind farms entered construction in 2013. Bloomberg recently released data showing that investment in renewable energy in Australia in the first half of 2014 had dropped to just \$40m. This is entirely driven by political uncertainty slowing the industry, and is well covered in the national press.

All this said, the RET review is expected to be complete by the end of Q3 2014. It is assumed to be a relatively short process for the government to negotiate and adopt an updated RET that will stay in place for the next few years. At this point, the industry will have enough confidence about its future to progress and for investment to restart. Retailers/utilities will understand their future commitments to obtaining large-scale generation certificates (LGCs) and will be able to restart the stalled PPA negotiations.

10: Construction timelines

As far as the Glen Innes project is concerned, the project was and is able to move into construction. However, GIWP's investors and banks are unable to provide the necessary investment until we can demonstrate that we can secure a financeable PPA from one of the national retailers. As discussed above, the PPA negotiations stalled in 2013 due to the regulatory uncertainty and are yet to restart.

11: Availability of debt

Commercial banks within Australia are keen to lend money to infrastructure projects, and project finance has always been the standard approach for that. Their ability to lend is driven by the security of their investment, and the surety of the debt repayment.

In the renewables industry, banks have traditionally lent against projects with fixed price, long term PPAs with credit worthy retailers. This gives them a high level of confidence and reduced risk associated with their investment.

The investment in Glen Innes is reliant on a PPA, which itself is reliant on the RET review. Once a PPA is obtained, then bank debt will be readily available, with equity provided by GIWP's owners.

12: Wind farm development progress

Overall ownership of GIWP changed in May 2013 from NP Power Pty Ltd to OneWind Australia Pty Ltd (OWA). As new owners, OWA are fully committed to completing the project in as short a timeframe as is feasible. Key to that has been making the project as efficient and financeable as possible, with full community engagement:

- We have worked hard to progress a modification to the approval to raise the tip height of the wind turbines at Glen Innes to 150m, allowing for the latest, most efficient technology to be used.
- We have upgraded the wind monitoring programme with a \$300,000 refurbishment of the measurement masts at the site, in order to improve the quality of the wind data regarding the site.
- We have progressed our negotiations with TransGrid regarding the interconnection of the project.
- We have developed a website, www.gleninneswindfarm.com.au, which will go live in August 2014 to provide up to date information to the community, and to allow the local community to contact GIWP with any questions or concerns regarding the project. This is an important link to the local community, and the web address will be advertised in local press and to relevant members of the community by mail.

- We set up a Community Consultation Committee in late 2013. The committee includes representatives from all parts of the local Glen Innes community, including a landowner representative and a Landscape Guardians' representative. The committee currently meets quarterly, has met twice so far (in March and in June), with the next meeting scheduled for 1st September 2014. The committee is a key tool for our liaison with the community and provides a forum for questions to the project and for GIWP to feedback regarding the development. GIWP notes that while a Landscape Guardians' representative has been appointed to that committee, they have chosen not to attend either of the meetings so far.

In general, we want to ensure that the Glen Innes project is ready for financing and construction once we can secure a financeable PPA from the retailers.

13: Property value impacts

This is not relevant to this modification as GIWP is not looking for any changes to the project as it stands, and the consideration of the project impacts have already been assessed under the original approval. We are just seeking an extension to the lapse date.

14: Uncertainty to non-associated landowners

In recent years, NSWDPPE has awarded 5 years development approvals to other wind farm projects. This time period provides enough time for the project to finalise designs, plan and prepare for all development conditions, negotiate and enter into relevant contracts, and undertake the myriad of tasks that are late stage development of a wind energy project. This timeframe also allows some time for the developer to assess the regulatory landscape and ensure that the project moves forward at the appropriate time.

Recent examples of the 5 year term include Flyers Creek, Collector, Bodangora, White Rock and Capital II. GIWP is not asking for anything unfair or unusual, just to be given the same length of time to complete the relevant development work and weather the regulatory uncertainty created by last year's federal election.

15: Impact on the community vs benefits

This project will benefit the local community in a range of ways. We have a \$75,000 annual community fund, to be managed by the Community Consultation Committee, and entirely independently of the wind farm and its owners, for use as the committee deems best for local people.

We will be providing a wind farm look-out viewing platform at the northern end of the site with relevant facilities through discussion with council.

During the construction phase of the project, likely to last 18 months, construction workers will live in the local area, spending money in local shops, restaurants and on property rents. This can be a large input into the local economy, and a big positive aspect of the wind farm construction.

Glen Innes Landscape Guardians' letter of 30th July 2014 reprinted for reference to the above

Numbers in the right hand column of the table indicate which of GIWP's responses address the LG submissions

As per the GILG August 2013 submission, in relation to the initial 12 month extension request to the Development Approval for the Glen Innes Wind Farm, I concur with the opinion that the Development Approval has already lapsed, therefore, I object to any extension consideration and approval to the second 12 month extension request.	
As stated in the GILG August 2013 submission upon becoming aware of Glen Innes Wind Power Pty Ltd's (GIWP) request for a 1 year extension to their approval for the Glen Innes Wind Farm, legal advice was sought which advised that the approval for the Glen Innes Wind Farm has lapsed (lapsed on or about 2nd October 2012 – approximately 10 months prior to the extension request) and therefore the Director has no power or authority to grant the extension requested of 1 year, and accordingly, we objected.	<u>2.</u>
GIWP in their first and current extension request confirm that they have not complied with their original Development Approval conditions – a very unsatisfactory situation.	<u>2.</u>
For the benefit of the Minister / Director Infrastructure Projects, I also provide the following comments on GIWP's second extension request.	
i. It is nearly 5 years since the Minister's Development Approval and GIWP has:	<u>2.</u>
a) Confirmed in its letters of 23rd May 2014 and 26th July 2013 that it has not complied with the conditions of the Development Approval,	<u>1.</u>
b) Not commenced construction of the Wind Farm,	<u>10.</u>
c) Not ordered any Wind Turbines, and	<u>7.</u>
d) Not entered into any Electricity supply agreements.	<u>9.</u>
In Summary, 5 years has elapsed and nothing has occurred - no major work has been completed or financial commitments entered into. It is unreasonable to grant GIWP further time to their Development Approval as the project is clearly not viable. If this project was viable, work would have been completed and agreements entered into.	<u>2, 6.</u>
ii. The Development Approval granted on 2nd October, 2009 does not comply with the requirements of the December 2011 NSW Planning Guidelines Windfarms (Draft), in particular the 2 km setback to residences.	<u>3.</u>
iii. This Wind Farm does not have the support of the Glen Innes Severn Council as the Development Approval of 2nd October 2009 did not, and still does not, comply with the Glen Innes Severn Council's DCP for Windfarms.	<u>4.</u>
iv. Wind turbines, which are within 2 km of residences which are not involved with the Wind Farm and have not consented to them, should be removed or relocated so that they are not within 2 km of these residences.	<u>3.</u>
v. The Wind Farm does not have strong community support (as claimed by GIWP) as attested by the petition of over 600 signatures objecting to the Windfarm tabled	<u>5.</u>

GLEN INNES WINDPOWER PTY LTD

ABN 83 105 607 538

	in the NSW Parliament. Also, parts of the Approval for this project were challenged in the Land and Environment Court.	
vi.	GIWP in their first 12 month extension request letter of 26th July 2013 outlining the reasons to support their request, they stated:	<u>1.</u>
	– They do not envisage requiring another extension - GIWP have now requested another 12 month extension.	<u>1.</u>
	– They are in final negotiations with a reputable European Turbine manufacturer to supply turbines on a turn key basis – 12 months later, no agreement has been signed by GIWP.	<u>6.</u>
	– The pending federal election has delayed signing of a Power Purchase Agreement as the contracting part[?] wishes to see the outcome of the election prior to signing - The election result is known, it is 12 months later and no Power Purchase Agreement has been signed by GIWP.	<u>7.</u>
	– Construction will start in the next 6 months - 12 months have elapsed and no construction has commenced by GWIP.	<u>9.</u>
	– Debt funding is available in the local market - 12 months have elapsed and no debt funding has been arranged by GIWP. Twelve months is more than enough time to finalise the debt funding arrangements.	<u>11.</u>
	– The current project is valid and justified under the current renewables climate. If this statement is correct, why haven't the turbines been ordered and construction commenced.	<u>6.</u>
	The question which needs to be asked and answered and goes to the creditability of GIWP is – Did GIWP really believe in the reasons advanced for the initial 12 month extension request when none have come to fruition? Such a situation puts the Director in a very difficult position.	<u>1.</u>
	Clearly the project was not viable in July 2013 and still remains unviable.	<u>6.</u>
vii.	In GIWP letter of 29th July 2013 supporting their first extension request, they stated that they do not envisage any changes to the scope and content of approved windfarm. This statement was incorrect – as you are aware GIWP have lodged Modification 2 requesting approval to replace the existing approved Turbines with new ones that have substantially increased sweep area and height. A major modification which has been strongly objected to. Further credibility issues for GIWP.	<u>1,11.</u>
viii.	Comments on the NSW Government Department of Planning & Infrastructure (Department) Development Assessment dated 16th August 2013 in relation to GIWP request for a development extension of 12 months for the Glen Innes Wind Farm.	

<ul style="list-style-type: none"> - It is clear upon reading this assessment by the Department, that the extension was granted based upon the following undertakings made by GIWP in their 12 month development extension request: 	
<ul style="list-style-type: none"> a) GIWP was currently in negotiation with a turbine manufacturer, and 	<u>7.</u>
<ul style="list-style-type: none"> b) The contracting party for the Power Purchase Agreement wishes to wait until after the federal election before signing the agreement. 	<u>9.</u>
<p>The Department then concluded, based on the undertakings made by GIWP, that as the above negotiations would be completed during the balance of Calendar 2013, it would not be unreasonable to give the extension requested - as everyone is aware GIWP have not adhered to their undertakings which now means that the reasons used to grant the 12 month extension didn't exist.</p>	<u>1.</u>
<p>The initial one year extension was more than enough time to complete these negotiations if the details as stated were correct and all the parties were genuine in their objectives and desires at that time.</p>	<u>1.</u>
<p>Clearly the project is not viable.</p>	<u>6.</u>
<ul style="list-style-type: none"> - A once only extension of 1 year by the Department is not inconsistent with the Departments actions in relation to major projects, 	<u>2.</u>
<ul style="list-style-type: none"> - The Department acknowledged that an extension of 12 months would provide an additional year of uncertainty for the community. However, the Department clearly believed that the outstanding contracts would be completed within calendar 2013, 	<u>7.</u>
<p>A further 12 month extension would be unconscionable,</p>	
<ul style="list-style-type: none"> - The Department considered that as the development extension request was only for a 12 month period, it does not propose to consider any changes to the layout of the approved windfarm at this time, and 	<u>8.</u>
<ul style="list-style-type: none"> - The Department acknowledges that Wind Farms can have a negative impact on some property values. 	<u>13.</u>
<p>It is extremely unfortunate that the Department, in making their decision to grant a 12 month extension, have relied upon undertakings made by GIWP which have not been adhered to by GIWP.</p>	<u>1.</u>
<p>ix. In relation to GIWP letter of 23rd May 2014, the following comments are made:</p>	
<ul style="list-style-type: none"> - GIWP has confirmed in this letter that they have not complied with the Conditions of the Development Approval: 5 years after the Ministers approval. 	<u>3.</u>

GLEN INNES WINDPOWER PTY LTD

ABN 83 105 607 538

<ul style="list-style-type: none"> - It is 5 years since the Minister approved the Glen Innes Wind Farm (which is already two years past the original approval time period) which is more than enough time to comply with the Approval Conditions which are not onerous. 	<u>2.</u>
<ul style="list-style-type: none"> - In this 5 year time period, GIWP have not undertaken any construction work or ordered the wind turbines. If this project was economically viable, as claimed by GIWP, during this 5 year period the directors in fulfilling their statutory obligations and acting in the best interests of the company and its shareholders would have at least ordered the Wind Turbines and commenced construction even though the windfarm may not be completely operational. 	<u>2, 7, 10.</u>
<ul style="list-style-type: none"> - GIWP have now demonstrated (which has always been suspected) that the Glen Innes Wind Farm is not economically viable – which is in contradiction of their statement in their letter of 26th July 2013. 	<u>6.</u>
<ul style="list-style-type: none"> - Debt funding has still not been arranged for the Glen Innes Wind Farm, although it was stated to be close to finalisation in GIWP letter of 26th July 2013. History would indicate that GIWP statement in their letter of 26th July 2013 was not true. If debt funding was available it could have been finalised in the last 12 months – clearly debt funding is not available for such high risk projects. 	<u>11.</u>
<ul style="list-style-type: none"> - GIWP demonstrated that the Glen Innes Wind Farm is only viable if it is subsidised (by taxpayers) under the Federal Government’s Renewable Energy Target (RET) scheme. Australian taxpayers’ appetite to provide subsidies to industries no longer exists. 	<u>n/a</u>
<ul style="list-style-type: none"> - GIWP acknowledge (which everyone already knows) that further development of the Wind Power Electricity Generation Industry will only occur if the renewable energy target is increased or at least maintained at its current level – all indications from the current review is that this will not occur, therefore this project is not viable. 	
<ul style="list-style-type: none"> - GIWP are inferring that once the outcome of the government’s RET review is known, the project will proceed. 	
<ul style="list-style-type: none"> - We struggle with this statement. Clearly a level of RET will be maintained, so why is the RET review used as a reason for the delay of this project and to request a further extension. All evidence points to a reduction in the benefits of the RET scheme resulting from the Government’s current review. GIWP want us to believe that even if the RET is abolished or substantially reduced, the project will proceed – we don’t believe this to be the case. 	
<ul style="list-style-type: none"> - In our view, the statement by GIWP that: “An ongoing renewables target allows Glen Innes WindPower (GIWP) to achieve a suitable price for the sale of electricity, and to attract funding to complete the \$150 million (approx.) project” is misleading. 	

<ul style="list-style-type: none"> - There has been a RET scheme in place for a substantial period of time, and everyone knows that the Government Review of the RET will retain a RET scheme, therefore this cannot be a reason advanced by GIWP for the additional 12 months extension. 	
<ul style="list-style-type: none"> - Also, it is obvious that what GIWP are really saying is that unless the RET is increased or maintained at a level acceptable to them, the project will not proceed – further delay and uncertainty. 	
<ul style="list-style-type: none"> - It is not “an outcome” of the RET review that is important to GIWP (as they state), but rather the particular outcome of the RET review, 	
<ul style="list-style-type: none"> - GIWP are saying that the project will only proceed if: 	
<ul style="list-style-type: none"> <ul style="list-style-type: none"> i. A suitable price is achieved for the sale of electricity, and 	<u>9.</u>
<ul style="list-style-type: none"> <ul style="list-style-type: none"> ii. Debt funding is secured. 	<u>11.</u>
<ul style="list-style-type: none"> - GIWP have had 5 years to arrange these matters which is more than enough time – if the project was viable these matters would have been finalised a long time ago. The project is clearly not viable. 	<u>2.</u>
<ul style="list-style-type: none"> - In response to the Department enquiry in relation to ongoing impacts of the Wind Farm uncertainty on the surrounding neighbours and community, GIWP state: “the project remains a certainty to proceed”, and the “delay in the project does not fundamentally affect our neighbours action”. 	
<ul style="list-style-type: none"> - We believe this statement is misleading as GIWP then go on to qualify this statement by saying: 	
<ul style="list-style-type: none"> - “Given a positive response to the review (RET) later in 2014, combined with the expected approval of our wind turbine size modification”. 	
<ul style="list-style-type: none"> - As the Department is aware there are substantial objections to the proposed increased size of the Wind Turbines and our expectation is that the Department will not approve this Modification. 	<u>8.</u>
<ul style="list-style-type: none"> - Accordingly, the project still remains uncertain, not certain as stated by GIWP. 	
<ul style="list-style-type: none"> - Also, for GIWP, what does a positive response to the RET review mean, viz: 	
<ul style="list-style-type: none"> <ul style="list-style-type: none"> i. Retain a RET of some sort: certainty to happen 	
<ul style="list-style-type: none"> <ul style="list-style-type: none"> ii. Increase the RET: impossible to happen 	
<ul style="list-style-type: none"> <ul style="list-style-type: none"> iii. Decrease the RET: likely to happen 	
<ul style="list-style-type: none"> - Clarity is required from GIWP on this vital matter. 	

<ul style="list-style-type: none"> - It has always been, and continues to remain so, a major concern of non windfarm landowners who live in close proximity to the Wind Farm the continued uncertainty about its eventual construction – my family and a school deputy principal and her family have already left the area due to this uncertainty and the expected adverse effects of the proposed wind farm. 	
<ul style="list-style-type: none"> - GIWP state that the local community continues to be consulted - this is not correct. 	<u>12.</u>
<ul style="list-style-type: none"> - The local community was not advised of, or consulted in relation to, by GIWP of their current request for a further development approval of 12 months for the Wind Farm. Also GIWP has not written directly to local residents in relation to this additional 12 month extension request to the development approval. As a minimum, if GIWP maintain they are consulting with the local community, these actions should have been undertaken. 	<u>12.</u>
<ul style="list-style-type: none"> - Notwithstanding that the Department inserted a new provision in relation to Community Consultation in the Development Approval for Modification 1 Community Consultation has not improved as required by this modification. 	<u>12.</u>
<ul style="list-style-type: none"> - GIWP state that the local community will benefit from increased rates. This will not occur. The development of the windfarm will not increase land values. As stated by the Department in their decision for Modification 1 in some instances the windfarm will have a negative effect on Property Values. Accordingly, rate revenue will go down, not up. 	<u>15.</u>
<p>x. A big problem currently being experienced in this country is the unfortunate fact that various industries want “subsidies from the taxpayers” to survive e.g. the Car Industry and Renewable Energy Industries. These industries are either viable in their own right without subsidies by pricing their product appropriately or they shouldn’t exist. The hard decisions have been taken in relation to the car industry. If Australians are not prepared to pay for the actual cost of “Green Power” (without subsidies) which is the case, then both the Green Power Industry and the Government have not sold the need for such.</p>	
<p>xi. As GIWP is aware, the owners of Highfields (viz: Deputy School Principal), being a non windfarm residence within 2 km of the Wind Farm, have sold their property due to the effects of the proposed windfarm and the continued uncertainty surrounding its construction.</p>	
<p>In summary, no further extension should be granted to GIWP as:</p>	
<p>a. It is 5 years since the Minister’s approval for this project which is more than enough time for GIWP to comply with the Development Approval Conditions which would not necessitate a extension request.</p>	<u>2.</u>
<p>b. It is 5 years since the Minister’s approval for this project and: –</p>	<u>2.</u>

– No wind turbines have been ordered,	<u>7.</u>
– No construction has commenced,	<u>10.</u>
– No Power Supply Agreements have been entered into, and	<u>9.</u>
– No debt funding has been arranged.	
In summary, nothing has happened over 5 years as the project is clearly not viable.	
c. None of the reasons given by GIWP for their first extension request, and relied on by the Department in arriving at their decision to grant the 1 year extension, have been met / adhered to by GIWP. This clearly raises a credibility issue for GIWP.	<u>2.</u>
d. There is still very strong opposition to turbines within 2 km of non windfarm residences whose owners have not consented to them.	<u>3.</u>
e. The continued uncertainty in the local community for this project.	
f. Adequate community consultation is still not occurring.	<u>12.</u>
g. Contradictory statements made in GIWP letter of 23rd May 2014.	
h. The project is clearly not viable now or when it was approved by the Minister in October 2009.	
Although GIWP's extension request is invalid, it is very disappointing that it was made at short notice. Clearly GIWP, based upon the reasons outlined in their letter of 23rd May 2014, knew well prior to the 23rd May 2014 that they were intending to seek an extension. This late request by GIWP has unreasonably forced the Department of Planning and Infrastructure to only allow a short submission period (when over one week of this time can occur for mail to be received by local residents) and has left local residents with an unreasonably short period of time to consult with their advisers to legally assess the merits of GIWP's request for an extension and to prepare and lodge submissions	