

Objection To The Proposal To Extend The Consent Time Allowed For Capital 2 Wind Farm To Be Built

I object to the proposal to extend the consent time allowed for Capital 2 wind farm to be built.

The proposal to extend is immoral for this project and the surrounding community and it is fundamentally dishonest in principle for the wind farms while the Government is reviewing the community's view of the wind farm guidelines and any changes it makes to them. The results of those guidelines should be applied to any new proposals and any requests for variations, deviations modifications, extensions and/or considerations.

The original consent provided for a very extensive period of five (5) years to build the wind farm. There is no evidence to suggest that the build has been delayed by any act of God or frustrated by any Government policy or determination. Capital 2's failure to build can be directly attributed to either, management incompetence or poor commercial judgements made initially. There is no reason or evidence to believe either will change and therefore the Department should not be rewarding either management incompetence or poor commercial judgements. For the department to do so would be detrimental to local communities.

In its recent submission to the Department on the draft wind turbine guidelines, the Clean Energy Council (CEC) stated that *"while approved projects have statutory approval to be constructed, some may never have an adequate economic case for construction."* Capital 2 were vying for a contract with the ACT Government for renewable energy and despite it being in close proximity to the ACT it failed in its bid to other wind farms in other states that could provide cheaper power. It may be that Capital 2 is one of those projects the CEC believes will never have an economic case for construction.

For the Department to grant Capital 2 an extension encourages other speculators to propose economically negligible wind farm projects in the hope that at some undetermined time in the future, conditions may change to their advantage while they tie up huge tracts of land – both of potential hosts and adjacent areas which are removed from alternative developments because of the potential impact of the wind farm should it ever be built.

This project should be rejected outright. It is not an administrative change but an attempt to tear up one of the most critical conditions of the original consent.

From the statement the Department placed on it's website, it would appear the Department has expressed a view in favour of the extension – this is before receiving and considering responses from the public! How can it do that? How can the Department describe the matter as: *"....This extension will preserve the renewable energy and economics benefits of the approved Capital II wind farm and allow sufficient time for the CWF2PL to review the approved Capital II wind farm in line with changing turbine technology and market circumstances"*. This is a blatant advocacy statement by the Department and it indicates that the Department cannot be regarded as acting impartially in reviewing the proposal of the

extension. It is also obvious to many that the application is exhibited only six (6) weeks before the current consent lapses. Since the timing has always been known to the proponents, it is fair and reasonable to presume they believed it would be a matter of rubber stamping by the Department prior to 1 November 2016.

The proposal to extend and all the public submissions opposing any extension **must** be referred to the PAC for a decision and not left purely for the Department to determine.