

Capital 2 “Modification 4”

Never has so much been so wrong with so little.

In introducing this modification, the Department writes:

“Modification 4 seeks approval to an administrative amendment to condition A4 of the Project Approval so as to extend the lapsing date by 5 years. This extension will preserve the renewable energy and economic benefits of the approved Capital 2 Wind Farm and allow sufficient time for CWF2PL to review the approved Capital 2 Wind Farm in line with changing turbine technology and market circumstances.”

Introductions on the Register normally stick to the facts. The first sentence is a good example of that. By then copying and pasting and therefore endorsing some of the developer’s reasoning for the extension, we could be forgiven for thinking that the Department has already made up its mind.

The attachment submitted by the developer in support of the modification is named:

“Capital 2 Wind Farm MOD 4 Application and EA”

We could also be forgiven for assuming that the attachment contains an **E**nvironmental **A**ssessment. How wrong would you be?

We are presented with less than three pages in justification.

The document starts with a page of Infigen back-slapping and project history. The use of the departmental description “administrative amendment” in two places by the developer indicates that prior communication took place between Infigen and the Department on the easiest way to get this through the planning process.

Infigen is also unaware of either the location of its wind farm or of Bungendore, as they are nowhere near 17 kms apart.

The rest of the document contains the justification for the modification under the following headings.

Policy uncertainty.

Infigen makes a good case that uncertainty has abated and why they don’t need a five year extension.

Public Interest in Renewable Energy Projects

No supporting evidence is supplied.

If there was, would it be Capital 2 specific?

We should see the “significant public interest in ensuring an extension” in the many reasoned submissions in support from the local community.

Economic Benefits

Unjustified investment claims.

The “investment” of \$240 million in NSW, will mostly be spent overseas, borrowed overseas, repaid overseas and the profits, if any, remitted overseas. A Clayton’s investment.

The heading is “Economic Benefits”. There is no corresponding section headed “Economic Impacts”

(The 120 full time construction jobs, even if accurate, might mainly consist of Chinese nationals brought in by the Chinese turbine manufacturer under the Free Trade Agreement with their own cook, housed in temporary dormitories on a host property, wages being paid to families back home. Who knows?)

Infigen should be asked to justify the “up to 6” full time jobs during operations. What factors would be in play to create 6 full time jobs?

Ask Infigen to justify the 6 full time jobs in light of the revelation in their June 2016 newsletter:

“Our team at Infigen is made of 58 employees – three are placed at the wind farms in NSW, WA and SA, and the rest in the head office in Sydney”

We get baseless claims about gross job creation. No mention of job losses elsewhere or the jobs created should the wind farm not be built.

Inadvertently, Infigen shows us how little they contribute to the local community.

\$130,000 over three years for 90 turbines (Capital wind farm 67 turbines and Woodlawn 23 turbines).

That equates to less than \$500 per turbine per annum.

The Department currently supports at least \$2,500 per turbine per annum (indexed, we assume).

Note: All of this has **NOTHING** to do with Capital 2.

In the Response to Submissions for Capital 2 Mod 2, Infigen spilled the beans.

“Finally, a Voluntary Planning Agreement has been executed with the Palerang Council which commits Infigen to provide \$20,000 (plus GST and CPI) per wind turbine installed at Capital II Wind Farm. The funds are to be allocated to the construction of new sports fields for Bungendore.”

Without seeing the VPA, the only assumption that can be made is that, with an expected 25 year wind farm life, this equates roughly to **\$800** per turbine per annum. Not even close to \$2,500 per turbine per annum expected by the Department.

Infigen continues to dud this community.

One thing missing from this section is the payments associated with host leases. That is unfortunate, as we would have liked to ask Infigen to detail what percentage of the host lease payments for Capital and Woodlawn actually stay in the local community.

We could have also asked who are the beneficial owners of these host properties and leases.

The most obvious omission in this section is the many economic impacts of a wind farm. Why do developers ignore this issue and why does the Department countenance it?

Let us list a few economic impacts.

- retail electricity price increases.
- property devaluation. The industry gloats over the Department’s confirmation that property devaluation is not a planning determinant, but it cannot be ignored in any assessment of economic factors.
- the development losses that uncertainty brings. A local property subdivided into lifestyle blocks will bring more investment to the local community than if the same property is devoted to a wind farm. Prove me wrong. Potential subdivideable land in the broader region of a wind farm stagnates.

Economically, the best decision the Department can make is to recommend to the PAC that the extension request be declined and let the market do what it does best, especially in an area where the wind farm is so close to the ACT.

Improvements in Technology.

I won’t buy a car this year as next year’s model will be better and cheaper. Repeat this five times.

Project and Impacts remain unchanged

Is Infigen saying that no residences have been built in the viewshed during the past five years?

Is Infigen saying that there is no difference in avi-fauna impacts between an empty Lake George and a current full Lake George?

Is Infigen saying that conditions surrounding decommissioning have not changed in the last five years?

Is Infigen saying that technology impacts, both good and bad, remain unchanged?

Is Infigen saying that the justification for Capital 2 is the same as it was 5 years ago?

Community Engagement

We are talking about Capital 2, not other renewables developments in the area.

Ask Infigen to prove that they have “continued your engagement via the Capital 2 Wind Farm Community Consultative Committee meetings as part of the Capital Community Committee.”

Should be easy: Independent Chair, uninvolved Capital 2 residents as members, specific minuted items (eg. discussion of mod 4).

Or is Infigen being deceptive.

By the time the PAC meeting comes around, I might have answers to the following questions:

Was any indication given to the developer that this modification would gain approval as a formality?

Did any discussion take place between Infigen and the Department on the strategy for this modification particularly in relation to the request from Infigen for a five year extension and the possibility that the Department would be amenable to a lesser extension?

Did any discussion take place between Infigen and the Department on the possible ways to handle the lapse date, particularly through an Administrative Extension?

Did the Department initiate any communication with Infigen on the need to address the looming lapse date?

Has the Department had any discussions with the Planning Assessment Commission as to whether the looming lapse date could be handled by a departmental Administrative Extension?

Did the Department follow its usual policy in determining that the 3 page “Modification and EA” was adequate for exhibition? Is the Department happy that the EA addresses the issues and makes a complete and logical case?

Did the Department ensure that the local community was aware of this significant “modification”. In what newspapers was it advertised? Did Infigen publicise it in any other format? Newsletter? Email?

Does the Department consider an 11 working day exhibition period adequate for a “modification” with such wide-ranging implications?

When was the last time departmental management had discussions regarding Capital 2 with Miles George?

Given the issues raised by the community with the Department and the PAC with respect to Modification 2, did the Department consider the need to address any of them in this “Modification and DA”?

What modifications, if any, did the Department suggest to the “Modification and DA” before publication?

Is the Department aware that the Capital 2 wind farm has a connection status of “Offer Received” in the recent Infigen annual report? Did the Department discuss with Infigen the implications of this status and hence the need for a five year extension?

Is the Department confident that its five year old Assessment is still contemporary?

Does the Department think that the community has been provided with enough information in this “Modification and DA” to support or oppose the proposition?

Does the Department have confidence that the assigned planner can make a recommendation that the community will accept as objective?

Does the Department believe that a Community Consultative Committee exists for Capital 2 (or for Capital or Woodlawn)?

And most intriguingly, was it the Department’s strategy all along to goad this community into forcing it to the PAC? “Our hands are tied, Miles.”

The greatest benefit of five years of delayed construction is we get an opportunity to correct our mistakes. Start by letting this project lapse.

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