

Submission regarding Jupiter Wind Farm- Greg Faulkner 535 Boro Road

Over view

My name is Greg Faulkner and I live at 535 Boro Road near Tarago NSW, which is roughly in the centre of the Jupiter wind farm project area.

I am completely opposed to Jupiter Wind Farm being approved, or any portion of it.

The area surrounding the project has many family homes built on small acreage and is an entirely inappropriate location to construct a wind farm. The local economy already relies on the established commuter and "lifestyle block" population who live there for the peace and quiet and the undeveloped outlook, and whose numbers will increase, providing further local commercial benefit if Jupiter wind farm is not constructed.

Our Home:

If Jupiter wind farm is approved and constructed we will have approximately 35 turbines centred to the North and 35 turbines centred to the south west of my home. I believe we are identified as non- involved residence number j144.

We will have turbines occupying 250 degrees of the 360 degree view. The distance from the nearest turbine to my front doors will be approximately 1100 m (or possibly only 1000 meters if 100 meters micro siting is allowed) and would be constructed on land that lies slightly higher than my home.

We will be able to see the nearest turbine from base to tip, as it would be situated directly across the valley from my home, with no intervening high country. A large electrical substation will also be located very close by to the North West and will front onto Boro road. As if this was not enough intrusion into this quiet rural location, the turbines will have red beacon lights on top which flash at night to warn aircraft of their presence. So at night we will have dozens of red beacons in the sky all around us.

Bearing all this in mind, it is safe to say that the construction of Jupiter would effectively destroy our current rural amenity, day and night.

I also believe it will subject us to noise and infra sound and interrupt sleep with consequent damage to our health and quality of life. My opinions are based on extensive reading, many visits to various wind farms and the homes of wind farm neighbours as well as my own involvement with community run back ground noise monitoring in the region, using industry standard equipment.

Construction of Jupiter wind farm may also put us in a position where we become financially trapped. It is entirely possible that we would find ourselves unable to move away from Boro

Rd, to some alternative turbine free location, due to reduced saleability of our home and our existing mortgage commitments.

In addition, I expect that construction of Jupiter would condemn me to the role of unpaid compliance monitor for the wind farm, where I try to ensure compliance with EPA conditions through fruitless complaints to an uncooperative wind farm operator. This awful situation is already faced by other wind farm neighbours I have spoken to in the area.

Both my current dwelling and my virtually completed new house are steel framed buildings. They are clad in colour bond steel sheets approx one mm thick. I pursued this style of construction specifically for reasons of fire safety. It is a feature of such structures that outside sound penetrates quite easily through the thin metal cladding particularly low frequency noises. They are much less resistant to penetration by low frequency noise than a brick building, and the entire frame is susceptible to low frequency resonance.

I began building our new home long before Jupiter was ever suggested. Our new house was designed specifically to take advantage of the rural views and solar aspect. Our large windows were designed and aligned to make maximum use of sunlight and we keep them clear of vegetation so they can full fill this role. If Jupiter is constructed these windows would be aimed directly at the nearest turbine at 1100m (possibly 1000m with micro siting), with two more located not much further away and then the array of more than 30 to the north.

In addition my new house contains a second storey with large glass doors and elevated deck areas. One of these decks would be directly aligned with the southern arrays of turbines (over 30) and the other dominated by the same nearby turbines as the main windows.

Boro Road

My home is situated on a hill beside Boro Creek. It is one of several homes on the same section of Boro Road, which will be sandwiched in between the two main arrays of turbines. Far from being wind farm neighbours, if Jupiter is constructed, residents on my section of Boro road will be reasonably described as living *inside* Jupiter wind farm.

In almost every direction you may look you will be confronted by enormous industrial turbines. To reach my home you will have to pass through these and also pass directly by the electrical substation, which will be located near the road, and with all its associated overhead cabling. How can anyone claim (with a straight face) that this situation will not affect character, saleability and amenity? How are residents expected to react to such a proposition? How would you react if this was happening to your home?

On my section of Boro Road, the impression will be one of having been incorporated into an enormous industrial complex. In addition to being surrounded by 173 meter tall turbines, the construction of the large substation would be totally incongruous with the landscape

and is the absolute antithesis of what people who move to rural locations are seeking. That is to say ***It is precisely the type of industrial infra structure that prospective rural buyers seek to avoid***, and is guaranteed to lower the value and saleability of real estate all along the road. This is undeniable commercial logic.

Visual impact:

As the description above makes clear, the visual impact will be simply horrendous. I really think the use of the term “moderate/high”, assigned to my home in EPYCs EIS, is an inadequate descriptor and is used to minimise the reader’s impression of the impact. Turbines will fill about 250 degrees of the 360 degree view at various distances but starting at about 1100 meters. There is nothing “moderate” about this from my perspective.

I have spent a lot of time visiting and studying operational wind farms in the area and it is clear to me (and anyone else who takes the time to visit and look) that the height of wind turbines and the movement of the blades at close quarters is absolutely overwhelming. Their sheer size dwarfs all else. It is important to note that these conclusions are inescapable when viewing local turbines that are only 130m-150m in height, (the ones proposed for Jupiter are 173 meters high), and at distances of 2-3 km, which is more than double that which we would be subjected.

The 2011 NSW windfarm guidelines specifically cited 2km as a minimum desirable buffer between homes and turbines, and yet my home will be about half that distance to the nearest, with several more well within the 2km range and then dozens beyond that all around us.

Cumulative Visual impact

The cumulative impact of all the wind farms in the general area is a very real problem already and would obviously be exacerbated by approval of any part of Jupiter. In the passage below even EPYCs own Visual consultant expresses doubt about cumulative visual impact:

7.5 Cumulative Visual Impacts (Page 135 land scape and visual document- Jupiter EIS):

- the JWF is unlikely to result in any significant combined or sequential cumulative visual impacts resulting from associated views towards Capital and Woodlawn wind farm developments within the study area
- ***The JWF may, however, increase the perceived density of wind farm development within this section of the Southern Tablelands***
- ***The re-occurrence of wind farms within a region has the ability to alter the perception of the overall visual and landscape character***

• as wind farm developments prevail, it is important to determine whether the cumulative effect of wind farms and other major infrastructure within the region would combine to become the dominant visual element, altering the perception of the general landscape character of the region.

The views above, expressed by EPYCs own consultant, hardly seem to be a confident endorsement of the Jupiter proposal. To the contrary, these points convey considerable doubt about the suitability of the location for yet another wind farm. The consultant volunteers the possibility of increasing turbine numbers being a problem for the region because of the likelihood of turbines dominating the landscape and altering its overall character and this is exactly what will happen if Jupiter is approved.

In this respect the consultant has intellectually and ethically “leapfrogged” EPYC by swiftly identifying some of the glaringly obvious issues that EPYC has steadfastly refused to acknowledge or discuss for years, despite the best efforts of locals to make them aware.

Aerial firefighting

As I was writing this submission a large bushfire was being fought only 2km down Boro Road from us and the Currandooly fire occurred. These were a very sobering reminder of how important clear airspace is for modern firefighting. For days there were water bombing helicopters scooting all over the fire zone, small spotter aircraft circling and a huge water bomber DC 10 jet doing long, very low passes over the fire ground. Several nearby friends had their homes saved by aircraft.



DC 10 performing low level water bombing passes at Boro Rd during the 2016 fire, well below 173m.

Boro Rd fire

During the Boro Rd Fire water bombing took place all around the very area that EPYC proposes to construct its turbines. It was obvious to all observers that these aircraft were doing an enormous amount of the work, in terms of containing the fire and protecting resident's homes.

It was also obvious that there was no way these aircraft could have performed the way that they did if turbines were built. Turning off the turbines in this situation would have made very little difference to the situation; the aircraft would be completely unable to operate safely in amongst the rotors, spinning or not. The effectiveness of the aircraft would have at least been completely compromised, and frankly I doubt they could be used at all.

Regardless of whether turbines are switched off or not, their very existence would present an enormous and unreasonable risk to the pilots of water bombing aircraft. The turbines would be invisible in the thick smoke (as was the DC 10 at times, ask any observer), and there are no second chances for pilots.

In this respect Jupiter wind farm would pose a direct threat to our property and lives every fire season.

The EIS states: (16.7.25 Jupiter main report 1)

In terms of potential impacts upon the Project, there will be no WTGs or supporting infrastructure located within areas mapped as extreme bushfire hazard. Nine WTGs are in (or immediately adjacent to) areas identified as high bushfire hazard, and four WTGs are in areas identified as Medium bushfire hazard. The remaining WTGs are all located within areas mapped as low bushfire hazard.

Mapping has limited usefulness in bush fire management. Fires are unconcerned (or perhaps just uninformed) about where they are supposed to burn and it is the fires that “break all the rules” that do the most damage and take the most lives, just ask any fireman. The most recent huge Currandooly fire which started within Capital Windfarm came within a hairs breadth of sweeping over the entire Jupiter project area. The fact that it did not burn the Jupiter project area had nothing to do with maps and everything to do aircraft and the efforts of men and women who risked their lives to stop it. Surely Boro Road, with two major fires in a month, qualifies as an area of high fire risk-regardless of maps.

EPYC is fond of sharing their firefighting expertise and have informed concerned residents concerned about these fires that “the best way to fight a bush fire is on the ground” – what self-serving rubbish.

When you live in this area and observe almost annual fires being controlled by firefighting aircraft you realise that implementing any project which impinges on the free operation of these craft is not just an academic problem to be addressed with developers waffle about differing mapping levels of hazard. It is absolutely a life threatening reality.

Currandooly fire.

During the most recent Currandooly Fire unfettered water bombing again proved absolutely indispensable. I believe the cause of the fire is still doubtful, but what is clear is that the fire started in another wind farm and made it as far as the Jupiter project area. This fire was massive and terrifying and required the use of even more airpower than the Boro Rd fire. In this instance both DC 10 and Hercules water bombers were required and again saved homes and lives. If Jupiter were already built this would have been a case of fires spreading from wind farm to wind farm.

Even if this fire was ignited by a spontaneously combusting bird (the current dubious explanation) how is it possible that current wind farm design allows this? How are we supposed to feel, knowing that the next deadly fire is only one explosive crow away? Will the department be investigating and reviewing the design rules that allowed this to happen, or is it happy to let the matter slide?

Given how the final facts about critical events can often take time to surface, the department may be well advised to take an active interest in the matter now in order to avoid ending up on the wrong side of any subsequent findings.

However, regardless of cause of ignition, the Currandooly Fire has made absolutely clear that there is an undeniable risk in being a WF neighbour. This will only provide one more reason for nearby home owner to want to have their properties acquired in order to leave the area, and for potential buyers to decide to spend their money elsewhere.

I have looked at the “Bushfire risk and hazard assessment” document in the EIS and frankly I think it is dangerous rubbish. It is an exercise in strategic wording and careless assumptions. If the department agrees with the logic of this document and goes ahead to recommend approval of Jupiter then people will get hurt or killed.

The Bushfire risk and hazard assessment document states: ***The risk of fire from a wind farm is low*** -Well apparently not low enough, given that the Currandooly fire started in Capital wind farm!

There is also no mention of the possibility of Birds starting fires at wind farms in the EIS, (if indeed a bird ends up being responsible)

It has now been brought to the attention of the public and media that the area surrounding Capital wind farm and Jupiter is at high risk of fire (regardless how maps are interpreted) and that it is home to a dense rural residential population.

In relation to providing after fire assistance to residents of the burned out area, Land services manager Annelies McGaw said (Goulburn post 20/1/17):

“There are a lot of small landholders so it is hard to get around it all,” she said.

“...Large landholders who are significantly affected are making arrangements for agistment and fodder but small landholders need more support because they don’t necessarily have the capacity to agist animals elsewhere. I’d anticipate it would be those people who’d be needing assistance.”

These recent fires have made it abundantly clear that this dense rural residential population relies on absolutely unrestricted access to fire suppression aircraft. From a residents point of view it is hard to imagine what additional evidence of this could be furnished, other than casualties.

Screen planting

The angle of elevation from my home to the top of the nearest turbines would be so steep that the turbine rotors will be effectively un-screen able by tree plantings or anything else.

EPYCs EIS even acknowledges this. Their visual consultant states, in relation to my home (number j144 in the EIS):

Due to panoramic nature of view, any screen planting would need to be extensive. Planting would need to be in close proximity to both the north and east facades of the dwelling. This would fully enclose the property in planting, reducing the visual impact but diminishing the panoramic nature of the view.

In fact the EIS stipulates that my residence would require extensive planting of **7 metre tall screening in close proximity to the dwelling**. Bear in mind my new 2 storey home is only 6 meters tall at the peak of the roof! So EPYC is suggesting that my house be buried in vegetation taller than the roof-which is just silly. Is EPYC unaware that Ember attack is the main reason that most rural homes burn down in bush fires. Suggesting we all add fuel to our yards and increase our vulnerability to Ember attack so EPYC can claim “mitigation” is irresponsible.

Screen planting is in complete contradiction to my **Schedule of Conditions** for construction at Boro road, issued by the Queanbeyan/Palerang shire council and re issued in October of 2016. The conditions of which clearly state:

The developer and future landowners shall provide a minimum fire radiation zone around the building at all times. The fire radiation zone is to be cleared of all bush, shrubs and trees. Individual shrubs and trees (one per 50m²) may be retained.

As I have already planted carefully selected and located fruit trees years ago, the allowance of 1 tree or shrub per 50m is well and truly used up.

I also understand that Home Insurance Policies for rural homes also specify fuel free zones around homes and that failure to adhere to this would result in higher premiums or refusal to honour insurance payments in the event of fire.

So screen planting at my home would be

- entirely unwanted,
- ineffective for the full curtilage of my home
- destined to be unsuccessful (the trees will likely die)
- An unreasonable imposition on my time and resources requiring ongoing watering and fencing maintenance. The area is often in drought and water is already scarce.
- In direct contravention of the Council conditions of consent for my home, therefore illegal.
- And would dramatically increase our vulnerability to Ember Attack during any fire and would have deleterious impact on my home insurance.

It is quite astonishing that EPYC has persisted so far its application without taking the time to consider the suitability of their flagship, and apparently only, mitigation measure (Screen Planting) in this area which experiences regular grass and bushfires.

In addition to increasing our fire risk, close plantings would fill our guttering with debris requiring regular maintenance to clear (more work) at the risk of spoiling our drinking water supply. The plantings would destroy the solar aspect of our home and shade our solar hot water system, requiring that we spend more on fire wood and LPG gas for heating and hot water.

Our homes electrical power is provided by our stand- alone solar power system, we have no grid power connection at all. This system requires, and currently enjoys, uninterrupted sun on the solar panels throughout the full day. Screen planting of the type suggested by EPYC would likely interfere with the operation of these panels. To compensate we would be forced to install more panels in other unshaded locations, with huge associated costs in purchase, installation, battery capacity, wiring and inconvenience. This could amount to tens of thousands of dollars and weeks/months of labour.

Implementation of this mitigation measure would utterly change the character of my home, create work for me, compromise our fire safety in numerous ways, make our home non-compliant with its Schedule of conditions and affect our home insurance.

Somehow I don't think EPYC could care less.

Urban approach to a rural problem

EPYC does not seem able to comprehend that rural lifestyle, generally involves rarely being inside ones house and often outside the house. People in this area (and any other rural residential location) spend as much time as possible out in their paddocks, looking after livestock, riding, spraying, fencing, planting, fighting fire or anyone of the other myriad of tasks that rural life brings.

Living around Tarago is not like living in Sydney. Screening the living room window of a home with a big tree does not solve the problem of rural visual impact at all. This is because you are rarely in the living room or inside at all, much of the day you are outside. That is the point to country living.

Undeveloped home sites

Another deficiency in EPYCs assessment of impact is that it only gives consideration to established dwellings or sites where residents have already been granted D/As by council. There has been no consideration at all of sites where residents are entitled to build, but have not yet applied for the D/A. Visual impact at these future home sites is definitely a

component of the overall impact of the project on a resident, but it has not been considered by EPYC.

High impact at a site where a resident has intentions of future development will result in devaluation of that site and contributes to cumulative devaluation of the property as a whole. It is quite clearly a legitimate additional capital loss for land owners which has been ignored.

Noise impact

It is a fact that Wind farms produce noise and infra sound. It is supremely frustrating to listen to wind farm proponents from Sydney making sweeping statements denying any noise.

There are plenty of residents in this area who already live near wind farms and they tell a very different story. I feel compelled to make the point that these people are not mentally deficient or NIMBYs. They are not jealous of their neighbours host incomes and they are not delusional. These are ordinary, honest people who have shared their experiences with their neighbours (even when they know their own situation is unlikely to change) and whose opinion should be valued.

Anyone who has done unbiased reading on the topic or who has lived near turbines will know that wind farm noise is a continuously changing and highly variable quantity. Weather, temperature, wind speed and direction, and mode of turbine operation all have huge input to the quality of the noise. All these factors can change on a daily and even hourly basis. To try to apply standardised measures to wind farm noise is at best an approximation.

EPYCs process for collecting background noise measurement (upon which the rest of the wind farm design hinges) was flawed in several ways. I have heard that EPYCs general manager, Mr Ibrahim Eid, placed at least some of the microphones in the field and tended to them. If this is the case, then I would like to know more about his qualification in acoustics as I understand that some of these microphones were also located very near roadside and near by noisy domestic equipment. For example domestic water heater/fan units.

It seems that EPYC is not aware of, or perhaps is not concerned about, the importance of correct microphone placement. Poor microphone can result in inclusion of extraneous noise into sound files. The data collected by amateur placement may represent background noise as artificially high, which compromises every step of the sound modelling process from this point on.

In addition, the entire back ground noise process should have been carried out by a single group of experienced professionals from start to finish. It needs to be confirmed if unqualified people, particularly those who have a vested interest in pushing the project through, have had any input at all in the background noise capture process in any way, let alone "hands on" involvement. This is a role for qualified and independent professionals only, and any respectable acoustician will attest to this.

I also understand that EPYCs background noise monitoring equipment did not include full time noise recording facility. This is a huge error. Local residents own industry standard noise monitoring, conducted over a period of years, clearly demonstrated how essential correlated noise recordings

are for identifying extraneous noise, in order that files containing extraneous noise can be deleted. Failure to identify and delete all files containing extraneous noise will have resulted in artificially high background noise figures and means the rest of Jupiter's design has been compromised as a result.

Sleep and Health impact

The health impact of wind turbine noise is still being hotly debated, and NHMRC research on this topic is still to be completed. Colossal turbines of the size proposed for Jupiter are relatively recent inventions and authorities should take care not to assume that the seemingly endless increase in the size of turbines will not result in previously un documented health impact. What applies for a 50 meter tall turbine may not apply for a 200 meter tall turbine.

What will the department's position be if the results of the NHMRC research support the existence of adverse health impact for super-sized turbines?

How can proponents claim that the matter of health impact is settled when this research has been requested and paid for but is still to be completed? How is it even possible for regulators to consider approval of more windfarms until the results are in and considered?

Does the department (and PAC) consider that the results of the current NHMRC research are a forgone conclusion? It absolutely seems that this must be the case when they continue to approve wind farms before the results are considered. Is this a rationale, prudent or responsible position for a government regulator? Will the Department and Minister guarantee residents that we will not be have any adverse health effects, should Jupiter be approved?

In addition the recent senate enquiry into windfarms has collected an enormous amount of evidence from many residents already adversely affected by their proximity to turbines. This even included some quite damning evidence from people who are making a very substantial income from hosting turbines. (Clive and Trina Gare in S.A), but who now regret their involvement due to the noise impact.

In the Southern Tablelands wider community, where plenty of turbines are already operating, it is generally accepted that wind farms deprive residents of quality sleep and adversely affect their health. The residents around Capital wind farm, Crookwell and Gullen Range live with them every day and they are in a position to know, first hand. Some people describe having rooms in their homes and workshops which are unusable due to noise, and many can't sleep due to substation and turbine noise.

One gets the impression that the Department and EPYC would prefer that local residents disregard this type of hard earned evidence, provided by our own neighbours, in favour of dubious reassurances and promises made by wind industry proponents who live in Sydney.

I have met with local people who have been made ill by sleep deprivation from turbine noise, and whose lives and health have been completely turned upside down...

Any notion that residents around Tarago should be prepared to sit by and quietly accept the same situation being inflicted upon us is absolutely unacceptable.

Property devaluation and saleability:

The value of my home is almost entirely based upon its current pleasant, rural amenity and views; it has almost no value as agricultural land and is only useful as a lifestyle property, as are most homes in the area. Any value my home holds, and its desirability to any potential buyer, is entirely based upon the fact that it is currently beautiful, peaceful and a nice place to reside.

Clearly its desirability (and therefore its value) will be somewhat reduced with a 175 Meter high turbines rotating only 1100 meters away, and a backdrop of 60 odd more almost encircling us. It would be quite a contrast to the outlook it has now.

These three nearest turbines in particular will absolutely tower over our home and our neighbours homes, and will be the dominant feature in the landscape. This is indisputable.

No one in their right mind will consider paying the same amount for my home, once those turbines are constructed, as they would have paid before they were built. A potential buyer simply will not pay as much for my home as they would pay for similar block which **does not** have turbines nearby, and such blocks are plentiful in the region away from the Jupiter project site.

Our ability to compete with other, similar property for sale in the region will be destroyed if Jupiter is approved and our only option will be to substantially lower our price. Anyone who has shopped for and purchased real estate themselves will be forced to agree with this simple market logic. I expect that this effect would commence from the time Jupiter were approved.

Jupiter is constructed, a visitor to Boro Road will likely be most struck by the abundance of huge turbines and by the enormous industrial aluminium and concrete electrical substation (regardless of what colour it is painted!). Why would anyone choose to overcome the costs, distances and other challenges associated with rural living, only to reside under colossal spinning turbines, next door to a substation, if they had not been trapped into the situation by mortgage commitments, crushed property prices and an effectively unsaleable home?

Tired claims that there is absolutely no devaluation associated with a home's proximity to a wind farm are absolutely frustrating to someone whose home may soon be absorbed into one. In fact it has been suggested that our home may even increase in value once the turbines go up!

These stupid claims fly in the face of all common sense, life experience and commercial logic and appear to be a very convenient cop out for developers and regulatory authorities alike. As far as I am aware there has never been a wind farm built in such a densely populated rural residential area as Tarago, and so it is impossible to say (with any integrity) that property values will not be adversely affected.

It is patently obvious that real estate values and saleability **will** be affected.

Jupiter 2 and 3

If Jupiter were to be approved in its current suggested form it would cause huge property devaluation. However, once they get their “foot in the door” with an initial approval, it is standard practice for wind farm operators in this area to apply for and be granted approval to build additional stages and also to increase blade size. Note Crookwell 1, 2 and 3, also Capital 1 and 2.

So the wind farm we see on the EIS plans may bear very little resemblance to the one we actually end up living with a few years down the track. The final version would likely involve arrays of additional turbine and larger blades.

This consistent pattern has been widely observed and people have quickly learned to be very wary of land located anywhere near a wind farm. The exception to this rule generally being if they are tricked or uninformed. If Jupiter were approved it is only a matter of time till the owner applies for approval for new stages and bigger blades, which would more than likely be approved. So it is important to remember that when we discuss any application for Jupiter wind farm, **residents are very aware that Jupiter 2 and 3 are lurking in the background.**

Community division.

The consultation approach employed by EPYC seems almost designed to divide the local community; The notion that a few large land holders, many of whom are often absent and live away, should engage with the EPYC to host turbines at the expense of so many neighbours amenity, home values, sleep and health is obviously divisive. You don't have to be a genius to realise that this business model was always destined to generate conflict.

How did EPYC ever envision that this arrangement, carried out in an area of dense rural residential development, could ever result in anything else? After years of observation it is now my honest opinion that EPYC simply don't care.

It was only after their first Jupiter EIS was already rejected by the Department of Planning that EPYC made begrudging noises about any “Benefit Sharing” with non- host residents. Even then, the insignificant amounts offered were tied to unbelievably restrictive conditions. **No one in their right mind would sign such an agreement** and, in any event, EPYC has made it clear that any residents who lodge any objection to their project with the department will no longer be eligible for Benefit Sharing. It seems these agreements are being used for something other than “sharing”.

The idea that a company with a poor track record and such a tattered reputation would be trusted by the Department to run a large state project is unthinkable. The outcome of any such approval would be certain disaster for local residents.

Consultation

To say that the consultation process surrounding Jupiter has been abysmal would be generous. At the recent departmental meeting with local people even one of EPYC's own hosts (the first resident to speak at the meeting) made it clear that he thought EPYC had done a terrible job re consultation and "selling the project". So it appears that opinion of the quality of EPYC's consultation is unanimous throughout the whole community, even those EPYC pays.

The consultation process apparently began with information packs which, for some mysterious reason, were not received by very many residents at all, myself included. Yet despite the fact that very few people, other than prospective hosts, had heard about the proposal during this period, EPYC still continues to try to claim valid consultation from this point onward. It was, in fact, the first of many periods of strategic withholding of information from anyone who may become alarmed by the proposal.

This debacle was followed up by a disastrous campaign of unexpected home visits by EPYC staff. They began arriving unannounced at people's homes to engage in "consultation". EPYC did not seem to anticipate the level of anger and mistrust this casual, intrusive approach provoked amongst locals. It is another case of EPYC failing to realise the difference between urban and rural values.

I had to proactively email them to request that they did not come to my own home unannounced. After some complaints from other residents I believe the department eventually requested that the practice be stopped.

The "information days" hosted by EPYC at Tarago were an exercise in withholding critical information from residents while simultaneously "ticking boxes" for consultation. EPYC were roundly criticised by many residents who attended and virtually everyone left as uninformed as they were when they arrived.

To use a common saying; getting information from EPYC is like pulling teeth.

EPYC would then refer to these anaemic events as "successful" in its newsletters, failing to mention the overwhelming and vocal opposition demonstrated by the local population.

EPYC's consultation with us has always been conducted in a way which suits their own purposes, and nothing else. The type and nature of the contact with us has been limited to what EPYC finds convenient, reportable and affordable. Their strong preference has always been to insist on so called "one on one" meetings at our home ("one on one" despite 3 EPYC staff attending?), however, we have never been comfortable with allowing EPYC into our home and have told EPYC this countless times. We prefer email for discussion with EPYC or group meetings, which is our prerogative. In any event I am not aware of EPYC making any genuine changes to their project as a result of their "consultation" with locals, regardless of the method employed. EPYC has proven to be utterly unskilled in and unconcerned about, conducting genuine and productive consultation.

Communication with residents who are not turbine hosts seems to be an inconvenient hurdle for them to overcome, while making absolutely no concessions and minimising cost.

At one point the community's level of ignorance and concern about the proposed development was so high that it eventually fell to the members of local community to host a "real information day", just to try to ensure residents had access to some accurate information to allow them to make informed consideration of their situation. However, it should not have been up to locals to invest their valuable time and to bear the financial costs to ensure that their neighbours were provided with sufficient information to give proper consideration to EPYC's development proposal. This was EPYC's job, but in this case EPYC managed to save itself a few dollars, and locals were effectively forced to do the work for them.

The constant themes throughout the EPYC consultation process have been

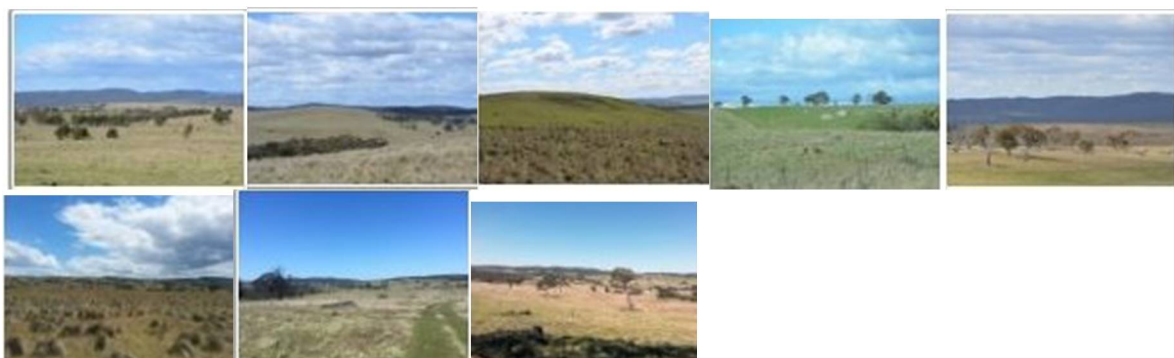
- the withholding of essential information,
- a claimed lack of knowledge about the detail of their own project,
- the shifting of responsibility for decisions to their own sub-contractors.
- Adoption of a manner which implies to the unwary resident that the success of their application is inevitable, with the Departments unbroken track record for approving wind farms making this ploy particularly effective.

The generally accepted local wisdom is that it is unwise to speak with EPYC without witnesses to confirm what is said. This impression has only intensified over time. Locals now accept that the best way to communicate with EPYC is in groups or writing, so there is some record of what is said. However it has been my experience that even when engaged in written communication with EPYC and they will simply break off communication when it suits them (usually when a difficult question has been posed). It is an unworthy strategy. At all stages of the process they have consistently tried to deny access to the vital information needed to formulate informed questions.

For local people the inescapable impression is that we are dealing with a company who is simply trying trick everyone.

Cheap Tricks:

Here are the site images for Jupiter wind farm, posted by EPYC on the opening page of their website.





Typical clear grazing land within the proposed project site



Jupiter wind farm has over 60 homes within 2km, many at a range of approximately 1km (mine included) and 150 odd within a range of 3km. This is the highest number of heavily impacted and nearby homes of any wind farm application to date.

However EPYC publish 19 “Site images” on a page entitled “Project Description” and not a single man made structure or home is shown in any of them! They even use the caption “typical clear grazing land within the project site” under the largest. There is not a single image containing a perceivable local building, it looks deserted! **Surely this is misleading and deceptive practice.** I really cannot believe it is accident or even negligence.

Why don't EPYC show a true depiction of the area on the “Project description” web page? How about showing just a few homes! There is not even a shed to be seen!

This is a crude and disingenuous attempt to mislead any uniformed reader into thinking that the project area is comprised of deserted grazing land, when in fact it is full of homes and families! It is exactly the type of cheap misleading manoeuvre that has stripped EPYC of credibility in the eyes of the local community and which should disqualify them for any approval.

Their web page really is an insult to local home owners; **it implies that we don't even exist**, and is somehow reminiscent of Terra Nullius. Does EPYC imagine that by pointing their camera the other way and shutting their eyes (and ears) that all the homes and people will just go away?

CCC Observations

My partner and I attended all CCC meetings as silent observers.

From the JCCC observers perspective EPYC appears to be a small organisation, with apparently limited resources and only three visible members. Of these three it's very clear that only one is trusted to speak at CCC meetings, whilst flanked by her two virtually silent co-workers. While it has been strangely fascinating to observe this arrangement, it is also deeply disturbing.

It's really seems that EPYC is a company which does not operate from a broad base of values and does not benefit from diverse viewpoints. It appears to be closer to a “one man (or woman) band” and appears to have little, if any, of the moderating input which a larger team would normally provide. I have read the bizarre documents they distributed to community representatives at the CCC meetings which struck me as paranoid and aggressive. It is a really extraordinary document to have distributed at a community consultation meeting and displays a remarkably adversarial corporate culture. It is my impression, formed over time, that EPYC are quite prepared to mislead

people and government, and that their actions may be determined by what they believe can “get away with” rather than best practices.

I think EPYC have demonstrated that they are corporate bullies, emboldened by the back- up of expensive legal counsel, and with little real respect for residents or Government. During the course of CCC meetings EPYC were generally unwilling or unprepared to provide information for which they were asked. In fact this appears to be their default position. EPYC even refused to detail the wind farm experience and other industry qualifications of its members, claiming it was not relevant to the committee. The request seemed very relevant and reasonable to me, and I thought a comprehensive reply would have been the correct professional response, rather than an arrogant refusal to discuss it. Surely any reputable company seeking to establish an industrial project in resistant rural community, is obliged to at least make clear the specific industry experience of its members?

But then EPYC often seem more intent on shutting down communication rather than encouraging it.

Photomontages

EPYC was at one point seeking to shoot photomontages from my home. This activity was of some interest to me, as I thought it would give me at least some impression of the scale of likely visual impact. However, when I asked EPYC for assurance that I would be given a copy of the completed images in exchange for making my home available, I was repeatedly denied.

I found this absolutely astonishing. Why would EPYC expect a resident to make their home available to make photomontages when the resident is refused a copy of the images to study for themselves? I still can't understand why they operated this way, it is genuinely baffling.

If the images generated are true and representative, why on earth wouldn't EPYC seek to provide them to residents at the earliest opportunity?? It seems little enough to ask, and might have actually gone toward establishing some level of trust with residents. The fact that they refused to do so raised instant doubts about the accuracy of the images and about EPYC's intent.

The fact that EPYC apparently failed to anticipate this type of response, this speaks volumes about their unsuitability to negotiate a project like Jupiter in a rural community. My impression is that employees of EPYC feel such a remarkably strong sense of entitlement about their proposal, that they are genuinely incapable of giving sincere consideration to any contrary viewpoint. They appear convinced that any measure of compromise would be a form of weakness, or capitulation. You simply cannot conduct constructive consultation in this pre-determined mindset.

When I asked EPYC why they refused to provide a copy of the images (which still seems a pretty reasonable request to me) I was met with a wall of confused excuses, which first seemed to try to shift the responsibility to their contract photographer, informing me that it was quite expensive to have montages made, and then ultimately some waffle about the images being EPYC's intellectual property..... So what?!..... They were going on public exhibition anyway; I think this was just another instance of EPYC withholding useful information till the last possible moment..

The most they would offer was to show the images briefly to us during a subsequent visit by EPYC staff, if I agreed to meet with them. What a sneaky way to get reluctant residents to let them visit their homes, by using the images as bait! Surely a firm seeking to build a large wind farm should

have sufficient resources and **confidence in their design** to be able to provide a couple of photos to inform potentially effected residents to study at length.

But all I was offered was a quick A3 or A4 glimpse and “see you later”.

Given that so many other residents were in the same boat, in the end it fell yet again to a local community member to produce high quality photo montages for residents to study, again at their considerable personal expense and time. Up to the point of exhibition, these locally produced photomontages are still the only resource many residents have had to gauge the potential visual impact on their homes. The fact that when there was a need from neighbours, a community member produced timely, high quality images from their own domestic equipment just serves to further highlight EPYC's meanness.

It is just quite impossible to imagine EPYC integrating itself into any rural community in any successful way. I really cannot stress this enough. It would be a disaster.

The photomontages showing mitigation measures in EPYC's EIS are laughable. They show several quite tall gumtrees and some low native shrubbery. It is a known fact that gumtrees do not transplant easily, and take detailed care to have a chance of surviving. EPYC need to explain how they intend to transplant and maintain mature gumtrees to act as a screen and who would be responsible for their care and maintenance, as well as what happens if the transplanting is not successful.

Who would actually end up running Jupiter?

While EPYC staff stated that they were going build and operate Jupiter wind farm, most local people do not believe this. It is widely understood that EPYC have already made the commercial preparations to enable the swift sale of Jupiter wind farm. I, and most other locals, believe that if Jupiter were to be approved then EPYC will seek to unload it at the earliest opportunity.

This renders any reassurances EPYC may make about the potential construction or ongoing operation of the wind farm meaningless. Locals all believe EPYC will be long gone by the time any initial construction takes place, little less commissioning or operation.

Previous rejection by the department.

Jupiter was previously rejected by the department on the grounds that

The proponent has:

Not adequately assessed the visual and noise impacts of the project, as required by government guidelines;

Not undertaken sufficient consultation with local residents about measures to reduce impacts of the wind farm, particularly in regard to visual impacts; and

Not fully considered the compatibility of the project with local planning controls and the emerging rural residential nature of the area

With regards to these points little has changed.

EPYC has not undertaken genuine consultation, of the type described above.

Its assessment of noise and subsequent modelling may be rendered quite unusable if the process (in particular back ground noise monitoring microphone placement) was not carried out, at all stages, by qualified professional acousticians.

The cumulative impact of yet another wind farm in the region will change the perceived character and nature of the area. This is supported by statements from EPYCs own visual consultant, who doubts about the cumulative impact of the project.

EPYCs visual mitigation measures (planting trees and bushes) are a dangerous joke and in direct contravention of the local “council schedule of conditions” for development of homes.

The situation regarding the emerging rural residential nature of the area has not altered. It is just as inappropriate a location for wind farm development now as it was in November 2015, if not more so. There are simply too many homes here.

EPYCs attempt to dodge this core issue by hiding behind definitions of block size contained within The Local Government Act 1993 (Jupiter EIS main report 1 page 112, 4.31) is a predictable and unworthy **attempt to ignore the spirit and purpose behind the department’s refusal to exhibit the original EIS.**

This tactic reinforces EPYCs absolute lack of concern for the local rural people who surround their project area. EPYC is desperately trying to avoid acknowledging the high the number of homes near the project area by using slippery words. They are apparently prepared to use any loophole or definition they can find to maintain their state of “population denial”. They simply display no integrity at all.

As Mike Young from the Department noted during the recent meeting at Tarago, with regards to density of surrounding homes, Jupiter is at the “highest end of the scale”. Local councils acknowledge the extent of local residential development, Local Members, the department of planning even the Australian Wind Alliance acknowledge it!

It seems the high population density surrounding Jupiter project area is blindingly obvious to everyone but EPYC.

Demand for wind power.

The Government is now in the position where there are a surfeit of renewable proposals seeking approval and already approved, so it has luxury of making discerning choices. There are more than enough renewable projects in the development pipeline to meet Australia’s existing RET.

Jupiter wind farm, already rejected once, with strong and comprehensive local opposition, and whose proponents have already deviated so very far from best practices, just should not be given consideration.

Approving Jupiter to be built in this rural residential area would help cement growing distrust of wind power projects and proponents, and do the local and Australian renewable industry more damage than good.

Even if Jupiter was approved it is very likely that a power purchase agreement and funding will not be forthcoming, with the result that the local community will be subjected to an ongoing, extended period of uncertainty which will continue to repel potential land buyers and impact adversely on local business.

This awful situation has already played out for too long at Crookwell where approvals for wind farms have not been acted upon for more than a decade.

Summary.

- **Jupiter wind farm is incorrectly sited.** This has been obvious from the start. Residents, councils and the department have done their best to inform EPYC about this. In spite of this EPYC have chosen to push on with Jupiter because they believe it does not matter how many people their development would adversely effect, **but it does matter.**

It is not the fault of local residents if EPYC have insisted on continuing to invest in a flawed development, despite sound advice not to. The scale of EPYCs poor choices should not be allowed to influence the Department and PACs decision to reject Jupiter. EPYCs unwise commercial decisions, unethical procedures and sheer obstinacy should not be rewarded with more sympathetic consideration from regulators.

For years now EPYC has demonstrated that it has absolutely no sympathy for any of the hundreds of residents surrounding their project. The Department and PAC should bear this in mind if they are concerned about EPYCs wasted investment. Any amount this company have stumped up would be quickly dwarfed by the combined capital losses of the individual home owners surrounding the project, most of whom are in no position to weather this financial loss.

Home owning locals have absolutely no choice other than to oppose Jupiter wind farm. Opposition to Jupiter is the only rational position for a nearby resident to take, and one virtually every Australian would also adopt if they were in the same boat. I suggest that the people assessing this proposal take a quiet moment to honestly consider how they would respond if their homes and financial future and families were threatened by a proposal like Jupiter

- The existence of turbines in the area would limit the usability of firebombing aircraft and risk lives. **I really cannot emphasise this enough.** If aircraft had not had free airspace to work in during the recent blazes at Boro and at Currandooly then homes and lives would have been lost. On this topic I really don't have much patience for any recommendations from EPYC to the contrary. Their homes are safe in Sydney while they seek to increase our fire risk for their commercial gain.

Facing fire in our area is already terrifying enough with the current unrestricted air space for water bombing. I cannot emphasise enough the sense of apprehension that grips us when we consider that these craft be any less available in fire season. **Boro Road is a No through Road, there is only one way in and one way out.** The dominant wind is from the NW, which is the direction the road runs. With a fast moving fire there us every chance that we could be without the option to evacuate because the fire is coming down the road toward us. In this situation **there is nowhere to go** and we need every single firefighting resource available to us **with full capability**. I don't think anyone who has actually been involved in a large fire would argue with this.

- EPYCS premier mitigation measure, close screening with vegetation, is entirely unsuitable for this location, it is unwanted, increases our fire danger in a region already prone to fire, it places a burden of nurture and maintenance on the us and contradicts our conditions of consent for development and construction.
- The factors cited in the department's last refusal remain unchanged and if anything are more relevant and progressed than they were a year ago.
- It needs to be confirmed if the Background noise monitoring process has in any part been conducted by unqualified people. Even if this proves not to be the case, the possibility of dubious microphone placement needs to be investigated as it may have produced artificially high back ground noise figures which render subsequent noise modelling for Jupiter invalid.
- The recent senate enquiry into wind turbines has raised various concerns about the construction of wind farms which have yet to be fully addressed. In addition NHMRC research into wind turbine noise and its impact on health is yet to be completed. To approve another wind farm amidst such doubt and without the opportunity to have considered the results of these enquiries and research would be hugely irresponsible on the part of the department and PAC. If the department insists on approving Jupiter wind farm will the Minister guarantee that we will not be have any adverse health effects as a result? Will he put this in writing?
- If the Department somehow manages to ignore the overwhelming evidence against Jupiter and is unwise enough to approve it, then it is essential that the conditions of consent, at the very least, include generous property acquisition rights for any homes in heavily impacted locations like Boro Road. These rights should be able to be implemented by residents at any point in time from Jupiter's approval until well after its commission and operation. This would at least enable us and other nearby residents to give the matter of leaving their homes fair consideration. Acquisition rights are the only way to provide an escape for those less fortunate residents, whose homes are exceptionally close to turbines or effectively surrounded by turbines. They would ensure that residents do not become indefinitely trapped inside an industrial complex.

When one considers the huge subsidies the operators would be paid for each turbine, the cost of such acquisitions is relatively insignificant. If Jupiter is approved this is the only remotely fair way forward.

- I believe approval of any part of Jupiter wind farm will be totally unacceptable to the vast majority of the local community. If Jupiter is in any part approved I expect that residents will have no option than to become even more active in their protest, deepening the controversy and further inflaming conflict and social division. To continue with Jupiter's development would mean forcing an incorrectly sited and discredited development on a completely resistant community. It is a bad look for the renewables industry and for the department and would be a disaster for local residents.

Please reject Jupiter wind farm.

NOTE to the Department of Planning:

If department feels that it would be helpful to have their consultants visit my property at 535 Boro Road in order to independently assess the potential impact then I am happy to cooperate and to have my contact details shared with those consultants so that a time may be arranged.

Thank You

Greg Faulkner

535 Boro Road