

## The problem of leaving all of your eggs in one basket

Given that there is only one VI mitigation strategy offered by Cloustone, what would the effect on the validity of the mitigation, if it was found that the use of vegetative screening is inappropriate in the project area? Unfortunately, some serious technical flaws in the Bushfire Risk assessment document appear to have led to further issues in other documents. In Appendix N, the project area is incorrectly identified in table 6.5 as ***“Residential assets in proximity to the Project are generally not vulnerable to bushfire due to their location in low hazard areas.”***

This is an extremely bold statement to make since the project area proximity has had at least six fires within the last six years, the most recent burning in excess of 3000Ha, resulting in the loss of one property, much stock, sheds/outbuildings and fences. Even bolder, when that statement is made as mitigation to the **loss of life**.

It is also bold to assume another's data is correct and use it without validation. Had annex N been accurate, it would have revealed that a large number of residences within 5Km of the project area are in **DESIGNATED HIGH BUSHFIRE AREAS**, and as a result, highly vulnerable to bushfire, as demonstrated six times in the last six years.

Residences in these areas are required to provide asset protection zones around their buildings in order to obtain habitation certificates and to remain eligible for insurance. The BAL ratings which the structures are required to build to, require these zones to be in place.

The DA (Palerang Council) for my residence mandates the following asset protection zones:

### **“Asset protect Zones**

28. At the commencement of building works and in perpetuity the property around the building shall be managed as follows as outlined within section 4.1.3 and Appendix 5 of ‘Planning for Bush Fire Protection 2006’ and the NSW Rural Fire Service’s document ‘Standards for asset protection zones’:

- North for a distance of 35 metres as an asset protection zone;
- East for a distance of 53 metres as an asset protection zone;
- South for a distance of 43 metres as an asset protection zone; and
- West for a distance of 35 metres as an asset protection zone (APZ)”

This hardly seems to be an appropriate requirement for a residence if it was in a ***“low hazard area”***, which clearly it and much of the area surrounding and within the project is not.

Consequently, the use of vegetative screening within these directions and their relative limits is of no use in my situation and absolutely inappropriate. Nor will it be of use to mitigate VI for anyone who has also built within the high bushfire risk areas as identified on Palerang’s website.

Of the several hundred other dwellings that are within 5Km of a turbine, how many others are prohibited to use the planting of combustibles as a mitigation strategy for the same reasons as me? Why has the EIS failed to identify this? Is this strategy even appropriate for use in this area?

**Who knows, consultation may have actually benefited the proponent in this case had it been conducted and not left residents at heightened risk to life.**