

Dr Stephen Brown
[Local resident]
Submission
Jupiter Wind Farm Environmental Impact Statement
14 February 2017

I welcome the opportunity to provide a response to the Jupiter Wind Farm Environmental Impact Statement ('the EIS'). On the basis of the documents available on the NSW Department of Planning and Environment website, I **OBJECT** to the proposal on the following grounds.

1. Lack of NSW Government strategic planning

There is no recognisable, State-wide strategic plan concerning the location of wind farms across NSW. Consequently, as a NSW resident it is impossible to purchase rural property without knowledge of proposed future wind farm developments. The selection of proposed wind farm locations therefore is undertaken on an *ad hoc* basis, thus threatening the amenity value for potential purchasers. As a recent purchaser (within the last 12 months) of rural land on Lower Boro Road, my rural landscape aesthetic is significantly threatened by the proposed Jupiter Wind Farm development.

2. Negative impact on the aesthetic character of the landscape

The aesthetic character of the local landscape will be significantly negatively impacted by the proposed development. The rural residential aesthetic of farmland and remnant bushland will be overshadowed by the proposed development's industrial character. The consequence, whether through local planning change or in reality alone, will be that areas currently zoned as 'rural residential' will in effect mean a change to an industrial zoning.

The proposal to mitigate visual impacts through tree planting is inappropriate. The rate of tree growth will be slow given the local growing conditions and, consequently, the time taken to screen the turbines will be decades and, thus, negate the impacts of aesthetic mitigation during the life of the wind turbines ... and local residents.

3. Unreliable evidence-based data on noise and vibration impact

The impacts from noise and vibration are unclear, even unknown, for local residents. Assessments of noise presented in the EIS are based on a number of different models; no specific model is chosen. Noise information is based on manufacturer's data and has not been field tested in local environments and conditions. As an affected resident, how will I be assured of the level of noise impact when the exact type of wind turbine has not been selected or tested in my area? Further, the National Health and Medical Research Council consider that further high quality research on the possible effects of wind farms is required. This high quality research must be done before the current proposal can be further considered.

I contacted the Department of Planning and Environment to request a detailed assessment of the possible impact on my property and lifestyle of the proposal. It was clear that noise and vibration impact (as well as visual impacts) could not be provided to me within the period of the public exhibition of the EIS. Officers from the

Department of Planning and Environment will be visiting my property on Wednesday 15 February (the day submissions on the EIS close) to make a visual impact assessment. I have been advised that the availability of a report based on the visit cannot be assured.

4. Increased bushfire threat from reduced capacity to use air tankers

In the previous six months, two significant fires have threatened, and in one case destroyed, property in the vicinity of Tarago and Lower Boro Road. In both cases, the risk of loss of life and further property was significantly lowered by the use of large air tankers to drop fire retardant and successfully combat the fires. These aircraft generally drop retardant on bushfires from an altitude of approximately 100m, and on occasion lower heights. Therefore wind turbines with a maximum tip height of 173m will preclude the use of air tankers delivering fire retardant from such altitudes. For me, this will significantly increase the risk of catastrophic bushfire at and in the vicinity of my property ('J242') and Lower Boro Road more generally. That is, wind turbines at 173m height will diminish the capacity of the NSW Rural Fire Service to effectively fight and control bushfires through the use of air tankers.

5. Inadequate cultural heritage assessment

As a professional archaeologist, I argue that the level of Aboriginal heritage assessment is inadequate, in that the current ERM (2016) assessment assesses 'potential impacts', at the EIS stage without the development of an Aboriginal Cultural Heritage Management Plan. Given the more than 40 years of field survey and documentation of Aboriginal heritage in NSW, it beggars belief that no Aboriginal objects (primarily stone artefacts) will occur within the development footprint. Thus, if the development were to proceed, the developer would almost inevitably 'harm' (either 'knowingly' or 'unknowingly') Aboriginal objects and thus be liable to significant fines as prescribed under NSW legislation.

6. Demonstrated negative impact of biodiversity

The EIS acknowledges the 'residual' impacts of the development on species (such as Glossy Black Cockatoo) and an EPBC Act-listed woodland community. The Glossy Black Cockatoo is listed under NSW legislation – with "a major threat to the survival of the Glossy Black Cockatoo is habitat loss." A second example of a threatened species is the Buttercup Doubletail Orchid, at both a State and Federal levels – largely a consequence of land clearing. The development should not proceed especially due to the significant impact on the Glossy Black Cockatoo as identified in the EIS, other threatened species and whole plant communities. All the threatened species require habitat, the complete floristic structure (including woody debris, etc.) not just replanting of juvenile trees that typically take decades to mature and form required species habitats.

7. Large number of properties affected by the proposal

In comparison to previous wind farm developments in the region, the Jupiter Wind Farm proposal will impact a significantly larger number of properties. Thus the impacts noted in this submission will be multiplied by the number of people/properties impacted.

8. Ownership of development company

The ownership of the company/corporation proposing the wind farm development is unclear from the perspective of future liability. It would thus appear to be a high risk enterprise for the people of NSW to be asked to support such a company with a major NSW project.

I would be pleased to have the opportunity to discuss these matters with you. I urge the NSW Government to reject the Jupiter Wind Farm proposal on the basis of the points raised in this submission.

Yours sincerely
Dr Stephen Brown