

Doughboy Hill
8689 Kings Highway
Manar NSW 2622

15 February 2017

Planning Services
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Attention: Executive Director – Resource
Assessments & Business Systems

By Email

Dear Sirs

**Jupiter Wind Farm Proposal SSD 13_6277
Notice of Objection**

I object to the proposed Jupiter Wind Farm at Tarago and Manar, on the Southern Tablelands in NSW.

In this objection I refer to the Environmental Impact Statement for Jupiter Wind Farm dated October 2016, on public exhibition (*EIS*).

1 Project impact and errors in the EIS

I own and operate two active sheep and cattle grazing properties in the Project area, Doughboy Hill at 8689 King's Highway, Manar and Carlindie at 8816 King's Highway, Manar. My land is zoned RU1 (primary production zone). My family has lived and worked in the district for over 30 years, developing our fine wool, fat lamb and beef cattle businesses. My properties lie in the southern precinct of the proposed development. Both will be adversely affected by the Jupiter Wind Farm Proposal (*JWF*). I am a "non-involved landowner" as I am not a hosting landowner.

Doughboy Hill is adjacent to one of the hosting properties in the southern precinct of the proposed development. Wind turbine generators (*WTG*) numbered 18, 19, 61, 15, 88, 36 and 65, together with a proposed temporary mobile concrete batching plant site and a permanent meteorological monitoring mast, are closest to my southern boundary; WTGs numbered 35, 64, 29, 63, 62 and 47 are further south, on a slope facing my house. I will have a direct line of sight from my house to the WTGs in the southern precinct and from my front gate to the vista of all of the northern precinct WTGs.

Carlindie is directly opposite, across the King's Highway at the corner of King's Highway and the Goulburn Road.

The Department says that this proposal is at the "highest" level in terms of the number of residences that would be impacted.

According to the EIS there are 140 dwellings within 3 km. I am aware that there are more than 250 residences within 5 km and hundreds more not far beyond that distance. There are also properties within those distances which have residence rights but have not yet been built on.

Dwellings on my properties (there are several) have been given the "unique J" numbers" (see EIS 4.3.1 and Figure 4.5) of J117 (Carlindie), J117A, J117B and J117C (Doughboy Hill). Based on Figure 4.5, there is an

error in the proponent's listing of dwellings on my land. There are 2 dwellings, not 3 on one property (J117A and J117B) and 2 dwellings, not one, on J117.

Given the importance of identifying affected dwellings, such an obvious mistake from the proponent calls into question the assertions in the EIS as to the number of affected dwellings and indeed their location.

Another obvious mistake in the EIS in relation to my property relates to the incorrect identification of vegetation on my property in the southern precinct. At the EIS 9.2.1 and Figure 9.1, the vegetation identified as existing on my property is simply wrong. So far as I am aware, the proponent has not inspected my property (as I did not give permission to enter it) and so the assertions as to vegetation type on my property are simply guesswork.

With obvious errors in objectively assessable criteria in the EIS, what credibility can be given to the EIS as a whole?

2 Scale

I object to the JWF on the basis of the scale of the proposed industrial development in a rural agricultural area, and a rural residential area.

The proposed development has (contrary to the assertion in the EIS at 2.6.5 that the "development footprint is relatively small") an enormous footprint, both during the construction phase and at completion. It is an industrial development entirely inconsistent with the rural agricultural nature of the district, consisting as it does of grazing and cropping properties, smaller holdings and rural villages set within a landscape of rolling hills, granite outcrops and bushland on the top of the Great Dividing Range. It is an area prized for its beauty as well as its agricultural production. It is entirely unlike an urban or industrial zone.

Officials from the Department of Planning, at a public meeting on 7 December 2016, made the following statements:

- what is proposed are big industrial structures in a rural residential area;
- the proposed turbines are 40 metres higher than the highest point of Sydney Harbour Bridge;
- turbines that high are visible from 40 km around; and
- among all the wind farms considered in NSW, Jupiter is at the "highest" level in terms of the number of residences that would be impacted.

The proposed turbines are much bigger than the existing Capital and Woodlawn turbines, which are also in the district. After approval, I am aware that many wind farm operators then seek "modifications" to increase height, blade length and power, as well as relocating turbines from the locations previously approved. NSW has recently started approving 200 metre turbines. If approved, I could expect JWF to have turbines over 200 metres high.

The EIS (at E2) describes the proposed development as consisting of up to 88 WTGs, each of a height of 173m, with adjacent pad mounted wind turbine transformer, crane hardstand area and turbine lay down area. Up to 13 of the proposed WTGs will be located within the southern precinct, adjacent to my southern boundary.

In addition to the WTGs themselves, significant industrial development will be required to develop and maintain (see the EIS at 3.2):

- an electrical substation / switchyard located in the northern precinct, including transformers;
- switchgear, insulators and other ancillary equipment;
- a permanent operations and maintenance building, located adjacent to the substation;
- an internal private access road network connecting the WTGs and associated infrastructure within the Project Area to the public road network;

- 33 kV electrical reticulation and fibre optic cabling connecting the WTGs within each precinct (installed predominantly underground, with some sections aboveground where required by topographical or other constraints), and located generally along the same alignment as the internal private access road network;
- a 33 kV transmission line connecting the 33 kV electrical reticulation networks, extending from the southern precinct to the substation, installed predominantly underground, with some sections aboveground where required by topographical or other constraints, and to be located within the road reserve of Goulburn- Braidwood Road, the Kings Highway and the proposed access road into the southern precinct;
- a 330 kV above ground transmission line connecting the on-site substation to the existing TransGrid 330 kV transmission line that passes through the project area;
- minor upgrades to local roads and intersections, as required for the delivery, installation and maintenance of WTG components and other associated materials and structures; and
- up to four permanent meteorological monitoring masts.

Temporary construction facilities will also be required during construction of the Project. These include:

- earthworks for access roads and WTG foundations;
- a temporary mobile concrete batching plant to supply concrete for WTG footings and substation construction works, and potentially rock crushing facilities for the generation of suitable aggregates for concrete batching or sized rock for access road and hardstand construction. Three representative locations and associated access roads for these facilities have been incorporated in the EIS, which would be utilised at various times as construction progresses across the Project area;
- cleared hardstand areas for construction equipment and storage (construction laydown areas).;
- temporary buildings and facilities for construction personnel / equipment, including site offices, car parking, and amenities for the construction work force, and lay down areas for the temporary storage of construction materials, plant, equipment and wind turbine components and temporary power supply for construction;
- external water supply for concrete batching and construction activities; and
- the transport, storage and handling of fuels, oils and other hazardous substances for construction and operation of wind farm infrastructure.

This amounts to a very significant industrial development, stretching more than 26km north to south, with huge permanent works, to construct the biggest windfarm in NSW. The scale of this industrial development dwarfs the rural and village character of the district, is hugely out of proportion to the local villages and townships, not to mention the farms and residences within the Project area. The Project is inappropriately large for this district, which already hosts several windfarms, a bioreactor and a solar farm. The effect of an industrial development of this scale would be to destroy forever the rural, agricultural and rural village character of the district.

3 Construction disruption

I object to the JWF on the basis of the impact on my property and farming activities the construction disruption will inevitably have, as well as the permanent disruption to the access to, and use of, my properties, created by the construction and maintenance of the WTGs in the southern precinct, in particular.

The sheer scale of this development means that the construction phase alone will take years, creating enormous disruption, noise, vastly increased heavy traffic movements along country roads and Crown roads,

noisy construction works in peaceful rural areas used (particularly in the southern precinct) as active grazing properties.

Immediately adjacent to my southern boundary is a Crown road (gravel) which divides my property from a host property. This is not a "paper road", it is a formed road providing access to the southern end of my property, amongst other properties, including a hosting property.

The EIS states that the Crown road will be the southern access point, and will be used as:

- access for heavy construction and maintenance vehicles to the host site – increasing the local intermittent traffic on that road to an industrial-scale truck and trailer highway, with all the noise, danger to stock, road damage and wear and local users that brings; and
- a permanent route for the connection of the southern precinct WTGs to the 33kV transmission line some 15km away – involving either or both of undergrounding the cabling (involving digging up the Crown road and creating a 4m wide development corridor - see EIS at 3.3.5) or the installation of overground poles and wires on my boundary, further adding to the unsightly visual impact of the development.

Further, the proposed cabling will run along the Braidwood-Goulburn Road, which alignment adjoins my property on the northern side of King's Highway.

The EIS at 2.6.5 disingenuously comments that "minor disruptions to agricultural activities may occur". This is a statement that deliberately underestimates the impact so much heavy traffic and construction will have on the daily activities undertaken on active grazing properties, and the impact it will have on stock and stock movements.

During construction, over several years, there is a massive increase in industrial traffic, hauling big construction equipment, materials for the massive concrete foundations, other building materials and of course the turbines, their towers and blades. Furthermore, particularly during the construction phase, the construction laydown areas, concrete batching plant and other activities will contribute the industrial zone on my southern boundary. Truck movements will be constant and involve 19m long semitrailers, B-doubles and concrete trucks, which will make access by local traffic and farmers carrying out their daily business (tractors, utes, cattle and sheep trucks, wool carting vehicles etc) difficult and disruptive.

This traffic occurs on roads not built for that purpose and which are used by local residents going about their normal business and for school buses, with bus stops located along the Goulburn-Braidwood road, placing children at risk. It is, of course, not just the volume of additional traffic but its nature, with numerous long and wide loads that have been reported at other wind farms forcing passing cars off the road.

4 Visual impact

I object to the proposed JWF on the basis of the immense visual impact of the wind farm on the district, stretching from Tarago to Manar. In particular I object to the immediate and unmitigated impact on my property in the southern precinct of the Project.

Whilst I understand that visual appeal is in the eye of the beholder, in my opinion the views from my property looking east and south east are beautiful. The EIS has identified the visual and biodiversity impacts of the Project as very high and high, respectively (see Table 8.5). My properties fall within the 5km offset zone of the WTGs, identified in the EIS (at 11.23) as having the highest impacts.

My property has been identified in the EIS as being largely rated as Zone 3, "undulating grassland" and the overall impact of the Project as Moderate/High. Importantly, (at EIS 11.4.1) *The Project is likely to alter some of the distinguishable landscape characteristics of Rural Development and Undulating Grassland zones and this is generally limited to areas in close proximity to the WTGs. The prominent height of the WTGs will be the most noticeable element of the Project.*

At Table 11.2, the impact on Zone 3 land is characterised as follows:

Sensitivity: There is a general absence of development throughout this landscape zone. Extensive views to ridgelines and distant hills are available from open areas. The structure of the landform is simple and contains few distinct features.

Any new tall development will potentially stand out prominently within the landscape, although the large scale of the landscape allows it to absorb some change. This landscape zone is rated as having a Moderate sensitivity.

Magnitude: The JWF turbines will be clearly visible within this landscape and may appear prominent when positioned on elevated topography and ridgelines. The WTGs may create a strong contrast in the Undulating Grassland as a result of their large scale, vertical lines and lack of visual integration.

The magnitude of the Project within this zone is rated as High.

Figure 11.2 shows that I will be able to see between 70 and 88 WTGs from my property, let alone the poles and wires and other infrastructure running along the Crown road along my southern boundary and the eastern side of the Goulburn-Braidwood road. The EIS identifies my property as being in the red/orange zone of visual impact (ie the highest impact zones). No public or private viewpoints as shown in Figure 11.3 reflected the view from my property to the southern precinct of JWF and its 13 WTGs. Obviously the viewpoints were inadequate and failed to reflect the reality of the visual impact on the properties themselves.

Nevertheless, the EIS notes at 11.23 that "although fewer in number [in the southern precinct], the WTGs will still appear as large scale elements within the landscape". At Figure 11.7, the dwellings on my property are identified as having moderate to high unmitigated impact ratings. I will see turbines in the immediate landscape from my house.

At 11.7, the EIS notes that in the southern precinct, 8 out of 13 WTGs may be lit: "some dwellingswill have clear views of the turbine lights. These lights will be discernible in an otherwise mostly dark sky". So the visual impact of the WTGs continues after dark, destroying the clear night sky which is one of the many reasons why I and many others choose to live in the district.

The only mitigation measure proposed in the EIS (at 11.9) is planting screening vegetation. It is not possible to mitigate the visual impact of the WTGs on my property given the undulating landscape and use of the property, with "tree or large shrub planting" as proposed at EIS 11.9.1. That is because my properties are active grazing properties, with tree lots already planted in areas where tree lots make sense and do not otherwise impact on the grazing activities of the properties. As active grazing properties, you cannot simply plant barricades of trees or other vegetation in inappropriate areas, as that alone would have a negative impact on the use and operations on the property. Further, simply planting trees and other vegetation to block the views of the WTGs will have the inevitable result of blocking the views which are lovely, across rolling grasslands and stretching east and south to distant hills. Further, inappropriate and higher-density vegetation will inevitably add to the bushfire risk of the district.

The EIS itself recognises the huge impact the JWF will have on the visual amenity of the district, including the maximum impact on my properties.

5 Noise

I object to the proposed JWF on the basis of the inevitable noise created by the WTGs.

The noise of a working wind farm can affect sleep, peaceful enjoyment of one's property, in some instances, causing headaches, nausea and long term harm to health.

According to the National Wind Farm Commissioner, Andrew Dyer: *There is **always** noise from wind farms*, though developers often claim there is not.

Scientific research shows wind farm noise is far more disturbing than noise, at the same loudness, from any other common source. That is why a number of people near wind farms have abandoned their homes (reported by the 2015 Australian Senate Select Committee on Wind Turbines).

Not everyone is affected by wind farm noise, and for those who are affected it is not necessarily all the time. Multiple factors are involved: atmospheric conditions, wind speed and direction, wind shear, terrain, and the fact it is the result of noise emitted by multiple turbines simultaneously and those noise sources are more than 100m in the air. Consequently, residences up to 10 km from the nearest turbine have been found to suffer excessive levels of noise, especially low frequency noise.

My house and other dwellings on my properties are within 1 - 2km of 13 of the largest wind turbines ever proposed for NSW.

The EIS for Jupiter does not produce separate noise forecasts for night and day. Of course it is the night time noise which is often most important since that is the period when people are trying to sleep and also the time when it is otherwise normally quietest.

In addition there will be blasting and other construction noise, and hugely increased noisy traffic movements over the years of construction.

6 Increased bushfire risk

The locality has just experienced two major bushfires. One started near the site of the proposed JWF and burned out about 500 hectares at Boro. The other (the Currandooley fire) started on the Capital Wind Farm, travelled 12 km to the east burning more than 3,000 hectares. It ravaged many properties, and destroyed one house, before being stopped just on the edge of a substantial rural residential development area. In February 2013, a major bushfire burned through Mount Fairy to Hazeldell Road, destroying stock, infrastructure and thousands of hectares of grazing land.

In all cases, aerial firefighting was critical in protecting properties. Because JWF is so close to a large number of residences (with many residences being between parts of the wind farm), there is a real concern about the ability to bring aerial firefighting to effectively protect residences, their people and on-the-ground firefighters in our district.

Furthermore, the idea that the visual impact of the WTGs can be mitigated by increasing vegetation in the district simply contributes to increased bushfire risk in the locality.

7 Devaluation of property

I object to the JWF on the basis of the devaluation of my properties as a result of the construction of the JWF and the destruction of the rural character of the district as a result of the huge industrial development proposed.

Within the past 3 years, I had cause to have my property valued. This was during the period when EPYC Pty Ltd had proposed JWF and it was well-known that a large wind farm was proposed to be built in the district. I obtained 2 separate, independent valuations from reputable valuers. Each of the valuations expressed the view that the value of my property was negatively impacted by the *possibility* of the construction of the JWF, and each valuation discounted the value of my property as a result. No doubt the discount would be greater should the JWF actually be built. The impact of a devaluation of my property has an immediate effect on my loan to value ratio under my finance facilities. It will also have an effect, in the future, should I wish to sell or refinance my property.

My own experience shows that there is property devaluation, particularly in rural residential areas, as a result of large-scale industrial windfarm developments. Many people are simply unable to sell their properties at a price that will allow them to move elsewhere. Most people do not want to live near a wind farm. I do not wish to live and work next to and surrounded by a wind farm.

Queanbeyan Palerang Regional Council also opposes the development on many grounds, not least given the visual impacts, loss of amenity, blade switch impacts, issues associated with access roads and the detriment to further residential development and infrastructure development in the area: see <http://www.qcc.nsw.gov.au/Latest-News/Council-opposed-to-Jupiter-Wind-Farm>.

The proposal is a large-scale industrial project in a predominantly rural and rural-residential district and will have enormous and negative impacts on the townships, villages and residents of that district. In addition, the proponent has shown scant regard for the concerns of the non-hosting landowners. The NSW Planning Department has a long list of complaints about EPYC Pty Ltd made by members of the local community alleging false or misleading communication, failure to provide information requested about the wind farm, and failure to pay attention to and respond to the concerns expressed by members of the local community.

In October 2015, the Department of Planning rejected the first EIS submitted by EPYC. The first reason given for the rejection by the Department of Planning in its letter to EPYC, said:

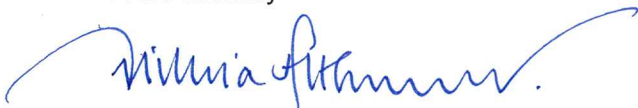
Inadequate consultation with affected non-host landowners

At the public meeting held by the Department on 7 December 2016, attendees complained about continuing terrible consultation by EPYC. When asked what had changed from its previous letter the Department could offer no explanation other than it thought it better to exhibit the EIS so uncertainty could be removed.

As a non-hosting landowner, the communication and "consultation" with the proponent has been lamentable. At no stage has the proponent addressed the real concerns expressed by the local non-hosting landowners, simply saying that "all will be addressed in the EIS". As a layperson, it is clear to me that the EIS inadequately addresses many issues, contains egregious errors arising from carelessness or mistake, and underplays the many impacts on the district of such an enormous development.

I urge the Department to reject the application by EPYC Pty Ltd for the development of Jupiter Wind Farm.

Yours faithfully



Victoria Holthouse