SUBMISSION ON BIALA WINDFARM EIS

Micrositing

There seems to be some belief in the NSW wind farm developer community that they can move turbines up to 100 metres in any direction AFTER approval. They call this micrositing.

The Biala EIS contemplates micrositing for the turbines but does not seek approval for any specific distance. The EIS implies the seeking of even more flexibility than 100 metres.

Imagine another State Significant Development, such as a building, requesting this latitude.

The most important decision in planning the wind farm is the location of the turbines. This is done by specialised expert consultants to ensure the maximum capture of the wind energy and the decision impacts on most major issues covered in the EIS, for example; the visual impact, noise impact, flora and fauna impacts and the assessment of cultural and heritage impacts.

Equally, the affected parties in the community rely on this decision. The developer, after some years, puts a stake in the ground.

Obviously, DNV GL, who we assume did the turbine layout, surveyed the 31 locations and provided the GPS coordinates of, in their professional judgement, the most suitable location for each turbine. These coordinates are published in the EIS.

The engineers and geologists amongst us appreciate that there may be need for small variations in the location of a small number of the turbine pads after approval when excavation starts.

All other reasons for micrositing should have been evaluated before approval.

Anything other than minor changes indicates that the developer has not done their homework. It also reinforces an implication that they are onselling the approval, so excavation becomes the problem of the ultimate constructor.

One hundred metres is not **micro**. I submit that the Department needs to take a stronger line with the resiting of turbines in the approval process.

1. The Department could set a more realistic distance that turbines can be moved, say 25 metres.

2. The Department could define the real project area as it relates to the turbines. Draw a straight line between each “outside” turbine in the wind farm or, if in

clusters, around each cluster. These polygons define the site. The developer would have some freedom to move turbines within that site but not any closer to impacted residences.

3. The Department could draft an approval clause along the lines: “No turbine can be moved closer than the approved closest turbine to any non - host dwelling”

Any re-siting that contravenes the chosen rule requires a new EIS.

This is an issue that needs to be resolved with clarity. We have the example of the Gullen Range wind farm where turbines were moved substantial distances without approval. The subsequent Planning Assessment Commission decision and Departmental reassessment resulted in court proceedings. The only parties who had no say in these processes were the impacted non – host residents, who ended up having to live with the resited turbines.