

Commissioners

Is the photomontage on the front page of the Assessment spatially accurate? From what I can tell, it seems to downplay the visual impact by at least 100%. The best you can say is that it is not as misleading as the same one in the revised EIS published by Green Bean Design (Figure 16, revised LVIA)

The Department has extended the distance within which turbines can be microsituated to 250 metres. The "standard" till now has been 100 metres. What were the technical reasons for this pro-developer change?

Mr Van Zyl from Tilt was quoted on ABC News on the 8th of March regarding the token changes recommended by the Department:

"It will severely jeopardise the viability of the project, and in that jeopardising the significant economic benefit to the local community, which will be in the order of \$2 million direct injection per year in the region,"

My guess is that representations will have been made to the PAC on the same topic. If so, these representations must be published. Failure to do so disadvantages the community. We should not have to use the GIPA process to obtain all relevant information that will be used in the Determination.

In their Assessment, the Department has already accepted the argument that a further reduction in turbine numbers to the number suggested by DPE, threatens the viability of the wind farm. How did they determine that? What arguments did the developer put forward? What expertise did the Department enlist to assist it in arriving at a decision that viability was threatened? If any of this is in writing, it must also be published.

We all know that Mr Van Zyl is bluffing. He knows that every recent wind farm approval has involved a compromise, however unfair it is to the non-associated residents. He also knows that he may have to compromise further.

If the viability of the Rye Park wind farm is in jeopardy with 84 turbines then whoever did the due diligence when Tilt/Trustpower bought the project from Epuron may need to find another job.

Mr van Zyl knows that the recently recommended Biala wind farm is apparently viable with 31 turbines.

Mr van Zyl would know that retailers and others are not prepared to enter into Power Purchase Agreements with developers of massive wind farms.

Mr van Zyl would know that finance, apart from that provided by the taxpayer, is not available for massive wind farms because the risk is too great.

Mr van Zyl knows that the viability of this wind farm is threatened because he and his contemporaries have so weakened Australia's once enviable energy leadership that the whole renewables card deck is about to collapse, maybe as soon as next summer, and wind will be the first casualty.

Mr van Zyl knows that his wind farm will be last in the NSW queue (and last in Tilt's own already substantial queue), queues already far longer than required to meet any current target, especially because this community and its growing band of supporters in the Tablelands will not go quietly. With such a choice, who would want to offer a PPA or provide finance should this project be unfortunately approved.

Those of us who have been following this Tablelands wind farm disaster for a number of years can speculate on the next step should the PAC regrettably follow its usual practice and approve this industrial monstrosity with whatever additional modifications it chooses to make.

The cynic in me suggests that Rye Park wind farm Modification 1 was going to be much taller turbines (minimum 200 metres) traded off against a reduction in the number, maybe to 84. The Department has removed that opportunity.

However, as the only physical turbine requirement now stipulated by the Department in the Terms of Consent is a maximum height of 157 metres, Tilt could build the Rye Park wind farm with a longer blade length and 25% more turbine power without having to submit a modification – talk about pro-developer decisions. They would be miles in front. Lower capital costs, lower construction costs, lower host and community payments, lower maintenance costs.

Maybe they were going to do that anyway.

Even on past performance, the Department has no qualms about modifications to extend the approved height. Tilt would again employ Green Bean Design, the wind industry's goto consultant, to come up with another document saying the additional VI is minimal. Sadly, there is some truth in the argument as the massive visual and other impacts will have already been incurred in the approval of the DA you are now considering.

Speaking of GBD, the Department employed O'Hanlon Design to peer review the GBD LVIA for Rye Park. Members of the Tablelands community have said for some time that GBD underestimates the Visual Impact on non-associated properties and uses indefensible methodologies, especially their variable matrices.

O'Hanlon Design seemingly agrees with us, although disappointingly in the peer review methodology description, they would appear to have ignored community submissions on the topic.

O'Hanlon Design independently determined the Visual Impact on each of 64 non-associated residences. In **no instance** did they come up with an assessment lower than that determined by GBD.

Recommendations:

That all future GBD LVIA's be peer reviewed.

That an independent audit be carried out to determine whether previous wind farm approvals, and those still in the planning process, that relied on the expertise of GBD were soundly based and legally defensible.

Response to Submissions

The Department has treated this community unfairly by not requiring the developer to respond to the latest round of community submissions. How can they do a true merit assessment without this input? I'll wager that all agency questions were answered and in writing. Those answers, of course, have not been published due to the lack of an RTS, further disadvantaging the community in its attempts to respond at this meeting.

Recommended action:

That an RTS is required following all public exhibitions.

That the PAC advise that all relevant documents from all parties relevant to the Assessment be published. As raised earlier, we should not be forced to resort to GIPA.

Anthony Gardner