

Commissioners,

The evaluation of Visual Impacts, on which the Department partially relies to arrive at a recommendation to approve the Bango project is flawed in a number of aspects.

The department's VI expert chose to limit the assessment to approximately 4km, widely at variance with the published literature for turbines of this height. You can't rely too heavily on the 2016 Wind Energy Guideline as supporting justification, as the same VI expert wrote the significant portions of that as well.

The same expert assessor was used by the Department to reinforce their argument to recently reject the Jupiter wind farm. In that very good assessment, the expert judged, from private viewpoint 13, 6.9 km from the closest turbine, that the VI was Moderate, whilst commenting:

“Predominant view of turbines in Upper Precinct”

If some residences will have predominant views of 173 metre turbines at 6.9kms, impacts on all properties surely must be evaluated to at least that distance for 200 metre turbines.

I deliberately underlined “properties” in that sentence above.

The Department and its expert only consider properties with established residences or approved DAs.

The SEARs of record for the Bango project require that all “subdivisions with residential rights” must also be considered.

Most properties with residential rights in the area are as the result of a subdivision over the years.

Where this attempted restrictor comes from is unknown because, clearly, all potentially affected properties with or without a residence are required to be comprehensively assessed.

Secretary McNally, in a letter to me on this subject, on May 23, 2017 (Ref 17/07329) confirmed this.

She wrote:

“it is important for proponents to identify all land that may be affected by a proposal”

The Bango developer has not and for some unknown reason, the Department never insisted that they had to.

The IPC, in any merit determination, must use as evidence all the significant impacts on non-associated residents. In the recommendation before you a significant proportion of that evidence is missing.

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