

Commissioners

DPE paraphrases in the Assessment some of the factors the EP&A Act requires that you **must** consider in your determination of the Bango wind farm application by writing:

“Section 79C(1) of the EP&A Act outlines the matters that a consent authority must take into consideration when determining development applications:” (including)

“- the environmental, social and economic impacts of the project”

The Assessment and the broader EIS before that, make no attempt to analyse the economic impacts.

The precise wording of the Act (section 4.15(1) in the new version) that the IPC must consider the:

“.....economic impacts **in the locality**” (my emphasis)

The Commissioners are therefore required to consider both positive and negative economic impacts of the project in their determination specifically as they relate to the local area.

The only dubious benefits, economic or otherwise, bought up by the Department, include the potential to:

“make substantial contributions to the delivery of the Commonwealth Government’s *Renewable Energy Target* and NSW’s *Renewable Energy Action Plan*.”

Lead times and the existing renewables backlog may well kill Bango’s contribution to the former and any objective review of the latter confirms it to be another government plan with little visible effective action.

The REAP was doomed to failure when it declared its vision statement.

“Our vision is for a secure, reliable, affordable and clean energy future for NSW”.

Those four objectives are totally incompatible.

DPE further claims the Bango project:

“would also result in associated benefits to the wider community including job creation, capital investment, reductions in greenhouse gases, and community funding contributions of up to \$200,575 a year (plus CPI) through a voluntary planning agreement with each of the two Councils.”

There will be some local job creation but surely job creation should be NET job creation? Besides, all gross job creation claims by the developer are unsupportable. GHG reductions in Australia will have no global impact on the problem that the reduction is trying to solve. The VPAs will provide additional funding, but five years after commencement we will probably find them absorbed into general revenue.

But back to the economic impacts in the locality, as the Act requires.

The Bango community is characterized by the significant number of non-associated properties within impacted distance of a 200 metre turbine, a distance far in excess of anything reluctantly admitted by the Department. The developer and the Department make no attempt to advise you that, in addition to the so-called local economic benefits, there are also some large negative economic impacts on many of these properties within the zone of impact.

These negative economic impacts **in the locality** have been ignored, once again, by the Department and the developer.

Where is the assessment of the economic impact of the devaluation of all non-associated properties? (raised in 20 submissions). We accept that there is no possibility, under current legislation, that compensation can be awarded, but the property valuation losses cannot be omitted from the required economic assessment.

Where is the assessment of the economic impact of the slowdown in growth of this area?

Where is the assessment of the economic impact of local property owners, with or without a residence, curtailing or halting their future investment?

Where is the impact on the ability of landowners to realize the value of their properties through future subdivision?

Where is the analysis of the overall impact, economically, on the locality?

Does it exceed that contributed in the locality by the wind farm over its operating life?

I don't know. Neither does the developer, DPE or the Commission, because no-one has ever done the required economic analysis for this development or any other, **as required by the Act**. I wonder why.

In the absence of this information, the Commissioners cannot make a merit determination and should return the assessment to the Department. The new IPC sets out to distance itself from the perceived failures of the PAC. Here is a chance to do so with a genuine independent merit determination.

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