

Capital 2 Wind Farm Resurrection PAC

Residents Against Jupiter wind turbines
Submission

Dr Michael Crawford

April 28, 2017

NOT A MODIFICATION

*This proposal is **NOT** a modification.*

*It is an attempt to resurrect a **failed project** which did not comply with its consent conditions and did not even start within the 5 years allowed.*

*To determine what is in the **best interests of the State**, the PAC is obliged to fully consider all the consequence of approval and all the consequence of not approving.*

Neither the developer nor the Department have provided the comprehensive information necessary to authorise approval of this wind farm.

*If the PAC is to act with integrity and act to protect the State of NSW, it must **unconditionally reject this proposal and allow the approval granted in 2011 to lapse.***

A Travesty of a Planning Document

An advocacy document not an impartial assessment

- No comprehensive risk analysis.
- No cost-benefit analysis of impact on the State.
- Ignores opportunity costs of approval.
- Ignores the likely decommissioning costs to future taxpayers.
- Ignores the likely contribution to NSW electricity insecurity.
- Ignores the contribution to raising NSW electricity prices.
- Ignores the cost if the NSW Government must subsequently rescind approval to protect electricity security.
- Ignores new information and policies relevant to evaluating wind farms.
- Advocates consent conditions favourable to the wind farm.

Visual Impact Non-Assessment

VI assessment in 2011 does not meet modern standards. Not revisited by DPE. Cannot be relied upon.

2011 Project approved

2012 BLM VI study (120 m turbines) [5]

2013 Offshore VI study (128m turbines) [11]

2016 *DPE VI Assessment Bulletin published*

1994 Stevenson & Griffiths study (40+m turbines) [8] – ignored

2002 University of Newcastle (UK) study (60m turbines) [8] – ignored

None of this considered in VI assessment in 2011 or now.

No evidence of competence in WF VI assessment by individuals involved

Decommissioning Mifeasance

No provision to ensure decommissioning funding:

- In 2011 approval
- In proposed revised consent conditions

DPE used to claim it would require a “bond”

Then (Crudine Ridge) discovered no legal power to do so

So now offers no mechanism to ensure funding will be available at end of life, when corporate entities owning wind farms will generally be insolvent.

Secretary says cost likely to fall on the landowners

Who pays if they don't have the funds?

Problem totally ignored in DPE recommendations

Decommissioning Pea & Thimble Trick

- DPE says the WF operator will be responsible for decommissioning
- **BUT** no mechanism to ensure funds will be available for that purpose
- It is the responsibility of directors to maximise shareholder value of their company, within the law
- Dutiful directors will ensure the entity owning Capital 2 WF is broke before decommissioning
- The decommissioning cost will fall on NSW Govt
- DPE pretends it does not understand this

Destroying Electricity Security

Electricity generating developments are fundamentally different from all other development proposals

They must be evaluated in terms of contribution to, and impact on, the **total** electricity system

A high proportion of solar or wind power creates grid instability (see SA)

A high geographic concentration of solar or wind power creates grid instability (see SA)

Future Grid Insecurity is NOW

The Australian | 8:46AM April 20, 2017

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Save



ROBERT GOTTLIEBSEN
Business columnist | Melbourne | @BGottliebse

Melbourne and Sydney normally have 10 to 15 very hot days each year where the wind does not blow. If we have a “normal” summer in 2017-18 in our two largest cities it is absolutely certain we will have blackouts covering 10 to 15 days.

The NSW and Victorian state politicians who deny that we face this situation are either lying or have not been told. Because Labor politicians in Victoria and South Australia and the Coalition in NSW caused this crisis, they know that voters in their next elections will be severe if there are widespread blackouts.

Robert Gottliebse, *The Australian*, 20 April 2017

Future Grid Insecurity is NOW (2)

As I [pointed out yesterday](#), power prices are set to double and gas prices will rise substantially over the next 12 to 18 months. Blackouts in New South Wales and Victoria will take place on hot days when there is no wind (that is usually about 10 — 15 days a year).

If there are blackouts I suspect the enraged community will demand that legal action be taken personally against the politicians and public servants, which naturally they will defend in the courts. The 1995 legislation provides for them to be [jailed for a year](#) if they make misleading statements. As of this weekend, politicians are now put

Robert Gottliebsen, *The Australian*, 21 April 2017

When The Lights Go Out

Premier Berejiklian might say:

“I and Mike Baird deserve to be tarred and feathered for trashing our State’s once reliable and cheap electricity supply”

. or perhaps:

“Decisions about this infrastructure are made by an independent body, the PAC. The people appointed are supposed to thoroughly consider all relevant aspects of projects they approve. Clearly they did not.”

When The Lights Go Out (2)

All those who played a part will be known

PAC Commissioners Making Determination

Wind Farm	PAC Members
Biala	Garry West, Prof Zada Lipman, Dr Maurice Evans
Crudine Ridge	Annabelle Pegrum, Andrew Hutton, Dr Maurice Evans
Rye Park	Gordon Kirkby, John Hann, Ross Carter
Yass Valley	Lynelle Briggs, Annabelle Pegrum, Robyn Kruk

and if this proposal is approved for resurrection:

Capital 2	John Hann, Annabelle Pegrum, Stephen O'Connor
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DPE totally ignored this critical issue and offered no advice to the PAC

Failure to Ensure Environmental Protection

OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT

1. In addition to meeting the specific environmental performance criteria established under this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, or decommissioning of the development.

“Material harm to the environment”: “Actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial”

Condition applied to:

Yass Valley wind farm, Crudine Ridge wind farm, Biala wind farm, Rye Park wind farm, Drayton South coal mine, Wilpinjong coal mine extension, Gunlake Quarry extension and Dolwendee Quarry

BUT NOT Capital 2 wind farm

????

DPE, Capital 2 & PAC

DPE has presented the PAC with recommendations that serve the interests of no one except the developer.

Those recommendations ***put the NSW Government, its taxpayers and its citizens at risk in a number of ways that is both wilful and scandalous.*** In particular by:

1. Contributing to increased electricity insecurity, which is already parlous, and increased electricity prices;
2. Virtually guaranteeing taxpayers will eventually have to pay for decommissioning the Capital 2 wind farm; and
3. Inflicting harm on people and the environment in the region.

The proposal should be unconditionally rejected.

Failure by the PAC to do so will constitute misfeasance by the PAC members individually and a wilful decision to harm NSW and the NSW Government to benefit a developer.