

CREPG RESPONSE TO DOP RECOMMENDATIONS:

I represent the CREPG – local non-involved landholders for this project.

The PAC has, I assume, access to all documentation regarding this project. What is of the utmost importance for me and this community is to bring to PAC's attention all important issues resulting from the DOP's Report, Recommendations and Consent.

I challenge the credibility of numerous DOP documents and I challenge the validity of DOP's assessment leading to its Recommendation and Consent Conditions in that it contains false material of which the DOP has been aware, up to Ministerial level, and at least one error of which they may as yet be unaware.

Both these false items are part of the Consent Conditions and require careful investigation. I will return to this point at a later stage. All documentation will be passed to PAC.

I will address parts of the DOP's response relating to Section 79C (P61/62). This effectively is the means by which the DOP justifies its decisions and recommendations.

- 1) "The project can be undertaken in a manner that is generally consistent with the objects of the Act".

The word 'generally' has permitted parts of the assessment process to hide behind proper scrutiny and can only imply that consistency may not be able to be relied upon.

- 2) "The impacts of the project can be adequately minimised, managed or at least compensated to an acceptable standard".

I will address this shortly with reference to information recently obtained from the ecological consultant used for the CREPG's response to the proponent's ecological report.

I believe impacts can be managed but only if DOP ensures that whatever plans the proponent has yet to prepare (and there are many) are stringently prepared and checked with a thoroughness that appears to be lacking for parts of this project to date.

- 3) The DOP maintains the site is suitable for the following reasons:
 - 3.1 "The best wind resources in NSW".

If one looks at the wind map (Figure 8, p17), the CRWF appears by the colour codes, to fit in a mid-range wind area (low/mod).

Has DOP based their statement 'best wind resources' on this?

Has DOP been given access to the proponents wind speed data from his test masts?

Has DOP analysed and calculated capacity factor, potential output from such data, if they have received that data to ensure the project attains 'best wind status'?

I requested such data from the proponent but was denied on the grounds the data was 'commercial in confidence'. DOP appears to accept the wind industries 'stock in trade' figure of 35% (p3). The AEMO data (September 2014 – September 2015) was calculated to be around 28% (Eastern Grid, with NSW less). Should this occur, then this must impact on the States Renewable Action Plan, potentially resulting in 10,000 fewer homes being powered and not saving approximately 73,000 tonnes GHG emission.

- 4) DOP justifies recommending the project on the grounds of wind availability, the nature of locality, grid access and, I quote, "a relatively sparsely populated locality".

This statement is appalling.

Local citizens are being considered to be second class citizens. To use a minority of the population to justify inserting this industrial complex into our midst sends a clear message that we are being discriminated against.

Does this contravene the Anti discrimination Act?

Has abuse of Human Rights been imposed on us, sanctioned by a NSW Government Department?

It is little wonder that this sparsely populated group of citizens have no faith in the DOP judging this project fairly.

5) 'Employment up to 15 personnel'.

Does this mean 15 full time jobs or is it, as I suspect, a smoke screen?

Note the following:

Hallet Wind Farm (SA) – 350 MW for 15 full time jobs ----> 165MW for 7-8 F/T jobs (CRWF)

Uungula Windfarm (Mudgee) 249 turbines for 25 F/T jobs ---> 77 turbines for 7-8 F/T jobs (CRWF)

The proponent (Mudgee Guardian, ? January 2016) states 'rule of thumb' of 10 turbines for each full time job.

Using these comparisons CRWF should have only the need for 7-8 full time jobs. This implies CRWF is twice as inefficient as the other two.

All the above ie 15 personnel (permanent) needs to be considered against the following taken from the CRWF website but currently not able to be found by me.

'Operation: Once a wind farm is in operation the site is monitored remotely. Maintenance staff visit the staff on a quarterly basis'.

The DOP was made aware of this possible inconsistency of permanent employment in regard to claimed financial benefits back to the community. No financial benefit can flow back to this community irrespective of how many temporary / permanent jobs are created. Our isolation without commercial services precludes this. Since this potential financial benefit cannot be achieved, Section 5a (1) of the EP and A Act appears to be unable to be achieved in part – once again we are relegated to being second class status.

6) In its Report, DOP attempts to justify its decisions with phrases such as 'is satisfied with', 'considers that....'.

We, the public, have no way of knowing how or why DOP has reached a decision, which runs counter to local knowledge and, at times, professional consultants employed by people objecting to differing projects.

It is our opinion, with respect to the quality and intensity of the CREPG responses (EA, PPR) that DOP should have met with a CREPG representative to explain their reasoning and decisions, if for no other reason than good PR. To have failed to do so shows little merit and helps to continue little confidence in some sections of the Public Service.

7) Insert: Soil / Water

8) Insert: Decommissioning

9) Insert: Aviation

10) Insert: Ecological

The final part of my address should demonstrate why we are all here at this PAC meeting. It is to ensure that this independent body is given all available material to reach the right decision for all parties.

I now come to the last issue that PAC will have to deal with.

On page 8, Schedule 3 (Consent Conditions) which DOP has set as part of its Recommendations, there are at least two items of false information, one of which DOP has been informed of for three

years, and taken to a Ministerial level (as part of other issues). DOP seems to refuse to accept that this information is false.

The other piece of false information is of their own making. Both result from easily checkable errors, but as a consequence, must surely place a cloud over DOP's ability to deal adequately with this project.

On page 8, Table 2, under the heading 'Residence', the so called 'residences' SFR13, SFR20 do not exist. SFR13 has been part of correspondence to former Minister Goward (along with other issues) in August 2014. SFR20 seems to have appeared in DOP's documentation for the first time in late 2015, and in the proponents most recent map (23rd November 2015). I think SFR20 is a hayshed, certainly not a residence as believed by DOP, after all it is on my property 'Woodlands'.

Under the Consent Conditions, SFR13, SFR20 (one non-existent, the other possibly the hayshed) have both been classified as a residence and have been granted 'visual impact mitigation upon request'.

In the proponent's EA his visual impact consultant described SFR13 as having a low visual impact due to , and I quote , "views to the SE towards the proposed turbines are generally screened by the vegetation surrounding the homestead and a rise in topography". This is not possible as the "homestead" does not exist.

It is my belief that this issue alone is sufficient to raise serious doubt in not only the whole process that DOP has shown from the beginning of its assessment period (about March 2013) of this project, but its capability to deal with the complexity of a major project such as this.

'Cutting corners' cannot be a criteria at **any** stage of the assessment procedure.

I believe the PAC cannot proceed to a decision until it has fully investigated all the issues and concerns that I have raised on behalf of this community who would provide further input as requested.

Thank you,

Owain Rowland-Jones
CREPG Coordinator
09/02/2016