

10 February 2011

I am a resident of Pyrenees Shire and reside in a property zoned Rural Living in close proximity to properties zoned Farming.

I am a current objector to a proposed wind farm that encroaches on an area of quiet rural residential properties and is, as proposed, to be constructed on an environmentally sensitive area. The positive outcomes of this proposed development as purported by the proponent are minimal and will not offset the negative impacts to the amenities currently enjoyed by local residents living in Rural Living Zones close to the proposed site at Chepstowe, nor offset the negative impacts on an area of significant conservation value for flora and fauna.

As per the Policy and planning guidelines for development of wind energy facilities in , page 27: 'Planning should consider the economic and environmental benefits to the broader community of renewable energy generation and the effects on the local environment.'

The volcanic plain surrounding Mt Emu is classified as an area of great environmental significance to the Victorian State Government. The biomass contribution of this area is recognised and as such it should be protected. With the approval of the Stockyard Hill Wind Farm in 2010, the significance of the landscape area that the proposed Chepstowe Wind Farm development is of even greater importance, as it will be the only portion of this landscape area with an unencumbered view of the mount in situ remaining.

Overall, I believe that this wind farm development represents a negligible contribution to Victoria State Government targets and a considerable negative contribution to the local community. Indeed, the proponent's application emphasises the smallness of the proposed development as a feature.

Future Energy (the proponent) maintains that it has completed "24 months of detailed investigation" prior to making this application. This assessment of their own documentation is concerning given the lack of rigour demonstrated under several main components and the inconsistencies within the information supplied, and the obvious bias and misrepresentation of the evidence supplied.

The Pyrenees Shire Council states that its strategies "Ensure that community's views are expressed and considered by council in its decision-making." page 12 Shire Council – Plan 2009 – 2013 (Reviewed 15th December 2009). And that to ensure that projects will not be to the detriment of the amenities enjoyed by the community, the Shire will ensure that "Specific renewable energy projects assessed on a case- by case basis" page 14 Pyrenees Shire Council – Plan 2009 – 2013 (Reviewed 15th December 2009).

For council's consideration, my objection to the proposed development was based on the following grounds:

Community Consultation:

The first notice I received of the proposed development was a 3-fold promotional brochure (referred to be the proponent as the 'newsletter') in late December 2010.

The information provided in the brochure was unsatisfactory. The map provided to inform residents of the proposed site, is unreadable, the roads marked are unnamed, the font too small, etc. There was no information provided - far from informing me this brochure has led to more questions. Somewhat reassured at the time that, as stated in the publication, a company representative would be contacting those within 3 km of the proposed development site, and I waited for this to occur.

An article published in The Ballarat Courier on the 21 February 2010 provided a property number which allowed me (for the first time) to actually locate the proposed site in relation to my property and was able to ascertain that my property (and many others) fell just short of the 3 km distance.

The rejection of the Snake Valley News wiki website to allow the Chepstowe Wind Farm Action Group a webpage on the site to provide a public access point for further information to the community was disappointing. An article by Councillor Alec Carson on page 3 in the September 2009 edition stated 'Each (community) group will be able "to independently maintain, control and edit their content via a community wiki"'. Denial of access to this public community portal has restricted the community's ability to gather information and debate the development proposal in a forum familiar to residents.

Chepstowe population:

The proponent selectively elects in the application to only acknowledge Chepstowe residents within 3 km radius of the proposed wind farm site as prime stakeholders. The Pyrenees Shire would be fully aware of the extent of the Chepstowe resident ratepayer population, size and distribution in relation to the proposed development.

Other considerations, as acknowledged in the application by the proponent, is the 'small concentration' of dwellings 3 km east of the site in 'the forest of Snake Valley', the local golf course, and the township of Snake Valley.

The surrounding landscape that includes Chepstowe residential properties located just outside the conveniently selected 3 km zone, includes my property, are described by the proponent (Future Energy Pty Ltd) in their EES Submission (EPBC Act referral no. 2010/5330:p2) as 'the forest of Snake Valley' to the east of the proposed site.

The direct information and communication with Chepstowe residents outside the 3 km zone elected by the proponent has been limited to date to the two brochure mail box drops (referred to by the proponent as 'newsletters') and a two-page spread in the Snake Valley News, March 2010. Both the brochures supply webpage details to the proponent's purpose-built website, the information supplied on the website reflects the characteristically carefully managed language and visuals and ambiguous information this company appears to favour.

The proponent has refused invitations to attend local community meetings to outline their development and answer any concerns from local residents. The proponent's preferred approach has been to meet with selected individuals, mostly on a one to one basis.

Residents, like myself, have hesitated to contact the proponent directly given reports from neighbours within the 3 km zone who have been contacted, of the proponent's representative's reluctance to answer pertinent questions such as the exact location of the turbines from their dwelling and the representative's set response of tree planting when concerns over the proposed loss of views to Mt Emu have been raised.

This is the extent to which Chepstowe residents outside the selected 3 km zone have experienced of the 'community consultation program with surrounding residents and the broader community' claimed by the proponent in the application.

Bushfire risk:

In recent years, post construction of my residence, my property and those around me became subject to a Wildfire Management Zone. My property, 44 McIntosh's Lane, Chepstowe, is a largely treed block, and is surrounded by other properties of similar vegetation. The requirements this zoning has for residential property construction do not

apply to pre-existing premises at the time the overlay was placed. My house, a relocated weatherboard/cement sheeting construction falls far short of the requirements needed to build under this zoning and is at high risk in the event of a wildfire. My personal safety and the vulnerability of my property is of major concern to me.

The community of and surrounds (including Chepstowe) are highly sensitive to the impact of fire. The Linton wildfire that started in Rowler's Road, in December 1998 resulted in the deaths of five firefighters. More recently, many homes were lost in the March 2006 fire which began in the same area and travelled in easterly direction, as did the October 2006 fire which started in Rowler's Road less than 2,500m from my residence and travelled in an easterly / south easterly direction. On both occasions the fire fighting included support from water bombing aircraft and helicopters. The proposed wind farm development lies west of my property my home is on a high point in forest surrounding. Wind turbines do catch fire and fire travels faster up inclines.

As stated on page 103, Rural Wind Farms, NSW Parliament Legislative Council General Purpose Standing Committee, No. 5, Dec, 2009. '(There) is a real threat of bushfires from the wind turbines catching fire. This has already happened twice in South Australia.'

Surrounding land use:

My property is zoned Rural Living Zone, a residential zoning with strict requirements imposed on landholders that promote the protection of local fauna and flora and provide quiet rural residential lots for residents. The proposed development will impact on the existing amenities I (and the resident and migratory wildlife) enjoy. This is a major concern to me.

Property value:

Developments of wind farms considerable reduce the value of quiet rural residential property located near them, particularly rural lifestyle properties. As a rural retreat, even the prospect of being located in close proximity to a wind farm development will reduce the saleability of my property and will limit my ability to relocate. This development has the potential to cause me considerable financial disadvantage given this property is my only asset.

Wind:

The proponent has failed to disclose details of its wind data, methodology or assessment of the wind on the proposed site, see Planning Permit Application Chepstowe Wind Farm page 10 Volume 1 – Main Document.

The Wind Map also declared as used by the proponent as the basis of the projected output and the calculations for the viability of this project is available to view from the Sustainability Victoria website.

This wind map has been developed using average annual wind speeds, given this, the map clearly show other areas in Victoria that experience stronger more consistent wind. The data from the last 12 months available from the Bureau of Meteorology, from the two closest recording sites to the site of the proposed Chepstowe wind farm; the Ballarat Aerodrome and Westmere, do not record any consistency in wind reports in either strength or direction.

The wind testing recently completed in and around Melbourne has recently reported that most sites were untenable when localised issues affected turbulence.

The lack of transparency regarding the purported viability of this project is of concern to me.

Noise:

Influencing factors: Topography

The siting of the proposed turbines place them in the middle ground between my property and Mt Emu with no landscape feature that could act as a buffer. A contour map of the area is provided (my property is marked with an 'X') showing the proposed sites for turbines will be placed along the same height contour line.

The information provided in the proponent's application assumes my property will be unaffected by noise. The simulated data that this claim relies on falls short of any expectations of a true assessment. A detailed study/assessment on my site for existing background noise levels would be required in order to provide data that would inform this question.

The planning application has no plan to ensure that residents within a 5km radius of project are protected from unreasonable levels of noise and low frequency vibration and does not acknowledge any potential impacts on the health of surrounding residents.

Future Energy ignores information regarding the emerging health issues at the Waubra Wind Energy Facility. Until there is a thorough independent study into the impact of noise on the health of residents in the area we are requesting that no one is forced to live within 5kms of wind turbines.

There is concern regarding the possibility of sonar generated by the proposed wind farm interfering with aircraft (especially aircraft used in fire fighting). This is an unacceptable risk to impose on residents in a high risk area covered by a Wildfire Management Overlay.

It is also not clear how this proposed development will affect GPSnet and AuScope infrastructure plans by the Victorian Government, which name Mt Emu as the site for a proposed AuScope Reference Station.

Landscape value:

Should the proposed wind farm development at Stockyard Hill/Lake Goldsmith surrounding Mt Emu be approved, the impact on the Victorian Volcanic Plain bioregion, EVC897: Plains Grassland/Plains Grassy Woodland Mosaic of the area will destroy the landscape value of the area.

The proponent's application underplays the proximity of proposed wind farm site to Bailies Creek (the creek forms part of the Hopkins River catchment) and the grassy plain landscape. This is of concern. The proposed development would result in the further fracturing of this bioregion, and is out of line with State government stated plans for a future land and biodiversity framework as outlined in, Securing our Future: White Paper for Land and Biodiversity at a Time of Climate Change, to build ecosystem resilience and improve biolinks.

As stated on page 19 in the Biosis Research, Flora and Net Gain assessment provided by Future Energy, 'It would not be possible to avoid vegetation losses on Sites 2, 3 and 3 A or on the access tracks to these sites.'

The biomass of the property subject to this proposed development has been the subject to rigorous research. Refer to the study, "Grassy Groundcover Research Project, Summary Report: 2004 – 2007", Greening Australia (Vic) by Dr Paul Gibson-Roy, together with Natural Heritage Trust and The University of Melbourne.

Lighting:

The proponent, Future Energy states in their application that, "landscape impacts are

mitigated by large setbacks and the fact no night lighting will be required". As provided by the proponent, CASA in their email response to an email from Severin Staalesen, Project Manager at Future Energy regarding CASA's requirement for obstacle lighting on the proposed turbines; stated, that while CASA do not impose any requirement on the provision of such lighting, advised the following:

"I would like remind you that a duty of care to local low flying aviators who may consider the wind turbines to be a hazard to their operations".

The neglect of the proponent to state correctly that lighting for the proposed farm will likely be required to cover duty of care is misrepresenting. This is a key component of the proposed project, and local stakeholders should have been clearly informed of this and been provided with the opportunity to evaluate the impact of this on them.

All the assessments concerning flora and fauna that have been provided by the proponent as support documents for this proposed development, have been written on the basis of the assertion by Future Energy that the turbines would not have lighting. Assessment of any issues regarding the affect of the proposed 3 turbine development with lighting on the avifauna of the area has not been addressed. This has the appearance of a deliberately misleading action on behalf of Future Energy to see this application waved through without delay.

Further to the point above regarding duty of care, be it Future Energy or any other power company they intend to on-sell the proposed development to (as indicated in their application), I seek assurance that the landholder and / or the leaseholder, has arrangements in place to ensure that appropriate insurance will be taken out, or that assets are identified, to cover the public liability risks associated with this type of 'farming' development.

Heritage Assessment:

The Cultural Heritage assessment is inadequate, being both inconclusive (see Recommendation of the report) and entirely unsatisfactory being based on false assumptions of the landscape and the bioregion.

The desktop assessment completed by TerraCulture Pty Ltd in November 2005 has only one recommendation that states '...prior to any development on the subject land, this desktop assessment be expanded to an archaeological survey for Aboriginal and European archaeological sites with a more comprehensive desktop component which specifically examines the potential for historic mines to exist across the subject land prior to any ground disturbing works commencing'. This initial desktop survey completed in 2005 does include the Aboriginal archaeological surveys that have been completed in the extended and surrounding area which confirm evidence of Aboriginal occupation.

Of significance is the fact that the Cultural Heritage assessment pre-dates the discovery and assessment of a significant Aboriginal site at Nunn's Pit, within 3 kms from the proposed site. Nunn's Pit is on the north side of Bailies Creek, the approximate same distance to Bailies Creek that the site for the proposed development is to the south of the creek. There is also other local knowledge of other Aboriginal sites, specifically ovens that exist on and around the property. Given the close proximity to Mount Emu, an ideal viewing point of the surrounds and Bailies Creek a permanent water source, the surrounding forests and the biodiversity that would have existed (pre-European settlement), in this area, it would follow that further archaeology is available.

The assumptions made regarding the vegetation on the property are based on aerial

photography supplied to TerraCulture Pty Ltd by Future Energy (see 1.2 of the report). The report states that “The subject land has been cleared of vegetation and is open, undulating pasture land.” This contradicts the Level Two (and Three) Brolga Assessment provided in Volume 2 – Appendices A-M which on page 4 identifies the geology of the proposed development site as ‘located in the Victorian Volcanic Plain bioregion’, and the Flora, Vegetation and Fauna Assessment contained in Volume 3 – Appendices N-O which identifies the Ecological Vegetation Class (EVC) 897: Plains Grassland/Plains Grassy Woodland Mosaic. This bio-regional conservation status of “EVC897: Plains Grassland/Plains Grassy Woodland Mosaic is considered endangered in the Victorian Volcanic Bioregion.”

The cultural history of the area is a matter of great concern to me.

Local community’s vision for its future:

The Snake Valley Community Action Plan November 2008, identifies the ‘shared priorities in the township and district of Snake Valley’.

The development of natural environment and conservation is included in the community action plan. The need to identify and document local flora and fauna is highlighted. The picture selected to represent the fauna of the area is the Brolga indicating its significance to the broad community that is the Snake Valley district.

Brolga surveys:

These birds were sighted in the Chepstowe area in the last breeding season 2009/10 no doubt due to the higher rainfall that has occurred.

This area is known for provided habitat for this vulnerable bird species listed under the Victorian State Flora and Fauna Guarantee Act 1988. The proposed development which intends to place three wind turbines between two known brolga nesting sites is negligent. Too little is known about this vulnerable bird. The two Brolga Risk Assessments provided by Future Energy in their application are not able to provide credible scientific analysis because of the paucity of information that is currently available in regards to the impacts of wind farms on this species.

The following are details viewed on the website (www.victorianbrolgastudy.com.au) of The South-West Victoria Brolga Research Project currently underway:

The wetlands of south-west Victoria are home to the stately Brolga, (*Grus rubicunda*). However loss and degradation of habitat and predation by foxes has over the last two decades seen a steep decline in the Victorian Brolga population, with nesting pairs now around 200-250. The wind energy industry has not contributed to its historic decline in numbers.

To avoid a further decrease in Brolga numbers, key representatives of the Victorian wind energy industry in south-west Victoria have come together to work with the Clean Energy Council, State and Commonwealth Government departments and the Bird Observation & Conservation Australia (BOCA) to conduct essential research on Brolgas in this region. It is essential that further information is gathered to both stabilise the decline and ensure the birds’ future in this area.”

The Victorian Brolga Research Project will enable industry and the public to gain a better understanding of the Brolga and to measure or mitigate any potential impacts wind farm developments may have on the species.

Given the above this development application should not be approved on the basis of the risk to the local indigenous Brolgas from this development.

Flora, vegetation and fauna assessment:

The Flora, vegetation and fauna assessment provided and the findings of this assessment are the results of a field survey carried out on 5 February 2008 and “was conducted during mid-summer, during a prolonged period of below average rainfall.” page 7 and a limited literature review.

As stated in the report: “The small amount of time spent at the site may not have been adequate to detect rare, cryptic, migratory or wide-ranging species”.

The Flora, Vegetation and Fauna assessment also states that the potential impacts of this proposed development on other local species of concern such as the Common Bent-Wing Bat, the Striped Legless Lizard and other water birds and birds of prey will be ‘restricted to local populations’. Loss of our local indigenous flora and fauna is unacceptable.

The Biosis Research Flora and Net Gain assessment provided by Future Energy also uses data collected from another one day site visit undertaken during the same time period, 17 April 2008. Biosis Research, also qualify their findings on page 3 of their report, stating that:

‘The flora and fauna assessment was conducted in autumn which is not an optimal time for survey.’ The reason being, ‘(s)ome plants species are dormant and/or lack flowering or fruiting material at this time making detection and/or identification difficult.’

Biosis Research also add; ‘the study area was heavily grazed at the time of assessment, making identification of some flora species difficult..’

The site area taken by Biosis Research to be 0.01 habitat hectares, is an isolated view of this site and does not allow assessment of the site as an ‘integral part of a larger site of significance*’. As stated on page 25, Appendix 1: DSE Vegetation Assessment Methodology; ‘If there is no ecological reason to divide the larger site, then the rating that applies to the larger site applies to the smaller site.’

*Biosis Research, Flora and Net Gain Assessment, Appendix 1: DSE Vegetation Assessment Methodology, page 25.

The study area is an inadequate size to base an assessment on. This is of real concern to me.

It is interesting that Future Energy have neglected to mention in the application that this property has been one of the subject areas that have been extensively researched from 2004 to 2007 by Greening Australia, in partnership with Natural Heritage Trust and The University of Melbourne. This research study, “Grassy Groundcover Research Project, Summary Report: 2004 – 2007”, Greening Australia (Vic) by Dr Paul Gibson-Roy, is more comprehensive and indeed provides for a more complimentary assessment of the range of (and resilience of) flora and fauna to be found on this property.

The low incidence of native flora on both of the one day assessments provided by Future Energy during this dry period in 2008 would be seen to be confirmed by the data collected by Greening Australia in their independent studies of the property from 2004 onwards. They also note the incidence of native flora on the site during 2007 was up to three times of native vegetation in the amount found in 2008.

The study, “Grassy Groundcover Research Project, Summary Report: 2004 – 2007”, Greening Australia (Vic) by Dr Paul Gibson-Roy in partnership with Natural Heritage Trust and The University of Melbourne, states:

“Over a three year period the GGRP has demonstrated it is possible to reconstruct grassy plant communities on agricultural lands..”.

Further conservation and regeneration of this vulnerable landscape is in line with State government stated plans* to restore the ecological processes and resilience that underpin the health of Victoria's land, water and biodiversity.

* Securing our Future: White Paper for Land and Biodiversity at a Time of Climate Change.

Proposed development and relationship to Stockyard Hill & Lake Goldsmith wind farm development proposals:

This proposal is being assessed parallel to another much larger proposal that if approved will impact on this important habitat zone area; the proposed Stockyard Hill and Lake Goldsmith wind farm developments. The timing of these two applications has left Chepstowe residents with no opportunity to raise the issue of the deficiency of the assessments contained within the Future Energy proposal regarding the assessed effects of this application in relation to any changed external landscape and any increased effects on native flora and fauna of concern.

It can only be assumed, using the risk analysis formula used in the assessment reports provided in the application proposal that, for example, the assessed risk of fatality for the Brolgas who frequent the area would exponentially increase with the number of turbines and area involved.

Infrastructure – roads:

The Shire's Strategic Resource Allocation Plan, 10 year plan 2009/10 to 2019/20, February 2010 does not identify costing or a revenue source for the road works that would be required to facilitate the increased traffic load expected during the 3 month construction period for the proposed development or to repair the roads to proper use after the construction. The roads to the proposed wind farm development site are categorised as Collector Gravel and are not constructed for this type of traffic.

The immediate concern is that it is assumed that ratepayers be expected to cover additional roads spending via increased rates, or if not that funds for other road-works badly needed in the area are expected to be diverted as part of this development.

The Shire's vision:

The ill-effects generated by wind farm developments in small rural mixed residential/farming communities, as has been witnessed in Waubra, have not and do not contribute to the Shire's vision of: "... a Pyrenees area to be a healthy, vibrant, prosperous and connected community." Pyrenees Shire Council – Plan 2009 – 2013 (Reviewed 15 December 2009).

Impact and affects:

The impact and affects that the community, ecosystems and habitat of Chepstowe is expected to be subjected to by this proposed wind farm development are unreasonable and are not mitigated by the proponent's unsubstantiated list of benefits of the proposal to the area.

There is no data supplied by the proponent to support to the extravagant claim of 'positive ramifications for the entire Shire'. The claim of 'new employment' is an unqualified statement. Indeed the relevance of claims to the proposed development such as: 'up-skilling of the community and sustainability education' made by the proponent as the 'positive ramifications' are mystifying.

As to the assurances regarding the viability of the proposal by the proponent in the application, the proponent states that a 'rigorous risk evaluation in terms of financial and

physical viability' has been completed but has omitted to provide any evidence to support this.