

Cindy Westbrook

From: David McFall [templemc@treko.net.au]
Sent: Monday, 31 January 2011 8:46 PM
To: council
Subject: ICR2910 - Flat Rocks Wind Farm Submission
SynergySoft: ICR2910

COPY

Dear Kojonup Councillors

Please find attached my submission for the Flat Rocks Wind Farm

Regards

David McFall

Submission: Monies Hill Energy Planning Application 'Flat Rocks Wind Farm'

Submitter:

David McFall

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Relationship to Kojonup: Family Farm property and project interests located at 'Temple Farm' Marron Pool Rd. and inaugural Chairperson Carlecatup Land Conservation District.

Dear Kojonup Shire Councillors,

I wish to oppose the granting of planning approval for the applicant's submission on the following grounds:

Technical capacity

I am not satisfied from the information given that the Project proponents and the listed company vehicle MHE have the technical capacity to undertake such a complex and specialist project. The current proponent applicants skill set does not indicate that the undertakings stated can be fulfilled.

I see little evidence of technical detail relating to the type of wind technology and its operational demands.

Financial capacity

The proponents do not in my opinion demonstrate adequate project financial capacity to implement, manage and decommission this project. A Full Life Cycle financial plan will need to be submitted and the project proponents need to demonstrate that they have the financial investment support to implement, operate and decommission the project.

Suggestion of a community fund is welcome though not specific and therefore a 'hollow undertaking' at this stage. Kojonup Shire will need to determine what the proponents mean here and a mechanism for implementation and management.

Environmental, landscape and general amenity impact

The project proponent's application is light on detail and I do not feel that they have adequately presented sufficient environmental study detail to fully address the potential impacts of this project relating to landscape and visual impact, noise, other amenity effects, vegetation and fauna as required under the WA Planning Commission Guidelines for Wind Farm Development [Bulletin No67].

The loss of amenity and landscape values due to a cluster of towers is hard to cost though needs to be considered when assessing an application. For example emerging testimonies indicate that the adjacent land values will be reduced [statements from Elders Rural Real Estate National Sales Manager Mr Shane McIntyre confirm that there is a 'repulsive' response to the visual nature of wind towers and a disrupted 'stillness' effect relating to an 'invading serenity' to adjoining lands. Such issues need to be fully understood and reconciled between project proponents and adjacent landholders. I see little evidence of this in the application which is a concern to me.

Lack of Local Government [Kojonup Shire] Planning Policy on Renewable Energy/ Sustainable Community Development

I believe that the Kojonup Shire should have in place a Renewable Energy/ Sustainable Community Development Planning Policy prior to assessing this application. Lack of an adequate planning policy will result in advoc development and potentially compromised future community decision making. A Renewable Energy/ Sustainable Community Development Planning Policy will enable the broader community to participate and determining the shape and direction of renewable energy industry investments that they wish to aspire within a sustainable community framework.

Information and Communication

I am not satisfied that the project proponents have provided adequate communication to the Kojonup community on the project. At an individual level I was unaware of the proposal until late in the development application and would like to have received a comprehensive project package as a potential affected landholder. For example issues such as night lights that will be potentially visible from our property have not been adequately modelled which may result in the loss of the following night horizon amenity as the below photo suggests.



Air navigation lights at dusk, Brown Hill Range Wind Farm as seen from 50km south at Clare.
There is no need, either for safety or in law, for the lights to be so bright.

I do not also believe that the proponents have contacted other landholders within the Carlecatup Catchment LCDC on these matters and the development application available online lacked the attachments stated.

I also see little evidence of correspondence between the proponents and agencies such as Synergy, WA Office of Energy, EPA, DEC in relation to the project.

Asset management and decommissioning Strategy

In respect to project decommission the proponents have not provided adequate detail in relation to the life of the project and or any suggestion of a 'bond' that may be formed to ensure undertakings to adequately deconstruct and site clean up are met. Such undertakings are essential to avoid visual pollution of defunct towers [see picture] and any other potential pollutants.

I do not see evidence that the project proponents have managed similar projects and or have the expertise to undertake a project of this complexity, finance and asset management thus raising concerns over long term viable operation.



Photo acknowledgment – [treedork, Flickr](#)

Grid Connectivity and evidence of capacity

The project proponent business plan is to connect to the South West Integrated System (SWIS) by
A) the proposed new Muja-Southdown 220kva line and/or
B) a dedicated 132kva transmission link to Kojonup substation.

On both accounts I am not satisfied that the proponents have the technical and or financial capacity to undertake such undertakings [specially in meeting a statement like ‘fund the construction of the 132kva line’ which will involve a great deal of further financing, planning and permit process arguably more complex than the wind farm proposal]. There is no evidence of a preliminary grid connection application and/or communication with relevant utilities and/or regulatory authorities to be permitted to connect to the SWIS.

It appears from the information submitted that the proponents are merely ‘prospecting’ potential wind farm localities rather than implementing a complete project business development and operation plan.

Risk management

Wind turbines can pose a fire risk in the advent that there is failure of the generation head. The project proponents will need to develop a project risk management statement to address such issues before the application can be fully considered.

Summary

I am not against the aspiration to bring new industries to regional WA though feel that the proposal presented for a wind farm enterprise at Flat Rocks region lacks depth in a number of key technical, financial and environmental areas. The lack of depth indicates that the primary business objective is more aligned to securing a 'wind farm location prospecting' objective rather than owning and operating a 'Wind Farm'.

I have found the information presented light on detail and open to subjective undertaking and capacity concerns [such as even connecting to the SWIS Grid]. This would indicate that the project is high risk and is premature for planning consideration by the Kojonup Shire Council.

As a proponent of sustainable development, including other renewable energy technologies, I would suggest that the Kojonup Shire Council develop a community engaged and endorsed Renewable Energy/ Sustainable Community Planning Platform prior to considering this application.

I believe that the growing concerns relating to the placement and operation of wind farms in rural locations and their impacts on the social, economic and environmental fabric of country living is a matter of further Parliamentary investigation and guidance so that Local Governments and Local Communities alike are best informed on the whole of life cycle issues that this renewable energy technology brings.

On these grounds I do not favour the application.

Photo courtesy Dave Clarke <http://ramblingsdc.net/Australia/index.html>

Or email daveclarkecb@yahoo.com