



PCU52470

"Lacklands"

619 Redground Rd
Crookwell 2583

3rd April, 2014

Ms Karen Jones

Director Major Infrastructure Projects

Dear Karen,

Excuse this correspondence and Submission being handwritten, but I am a one-two finger typist.

Please find enclosed my Submission opposing the Application by Goldwind for a retrospective Modification of their project.

I need not comment further on my Submission, but do require an acknowledgement, and would appreciate a copy of Goldwind's Application when it is lodged.

Yours faithfully

Michael Barlow

P.S. I understand Palings Gards and Crookwell III wind farms are also again up for approval. I was an objector to Crookwell III, and actively opposed the 50+km high voltage power line proposed to connect Palings Gards to Crookwell II's sub-station across our Shire.

Therefore, I want the chance to again oppose these two matters, so would appreciate any material on these two projects as they become current.

MB.

Department of Planning
Received

4 APR 2014

Scanning Room

OBJECTION TO MODIFICATION SUBMISSION BY GOLDWIND WIND FARM AT CULLEN RANGE DUE 69 OF 73 TURBINES BEING RE-LOCATED

INTRODUCTION

As a general statement, this Modification Application should be refused because, basically, it is a request by a Developer to have its significant constructional errors and deviations retrospectively approved.

OBJECTIONS IN DETAIL

These objections are on the basis that the turbine re-locations provided by Goldwind are accurate - which may or may not be the case.

1. The need for this late-stage Modification Application (only after local complaints to the DoPoI) shows that the original E.I.S. (all 1200 pages) was a shoddy document, because the two main reasons now given (1. "Increase wind yield and minimise wake loss", 2. "...turbine separation...", 33 and 13 times respectively) would have been unnecessary had the original document accurately taken these micro-siting factors into account.

2. Of the 22 turbines that have been re-located more than 50 metres from their approved sites, some 16 were moved closer to a non-host "receiver". So 16 families now have these large structures closer to their homes by anything between 18 and 34 metres at the lower end and 138 to 154 metres at the upper end of the variation.

3. In many cases the reasons given for the re-location are quite unconvincing, and more likely suggest incompetence on the part of the Developer who now expects nearby non-hots to bear the consequences.

For example, the most common reason given is "Moved to increase wind yield and minimise wake loss." This is cited 7 times for moving turbines less than 5 metres, and 17 times for moving turbines less than 10 metres. Does wind energy vary significantly over such minute distances? Why is this reason given for 3 turbines that were not moved at all (Ban. 20, Gur. 08, Pom. 08)?

4. In Appendix 2, the Developer lists the ²² turbines that are re-located by more than 50 metres, and also the new distance closer to or further away from the nearest non-hot "receiver". Only 6 movements place a turbine further away, but 16 are placed closer to a non-hot dwelling. Three of these have a turbine now more than 100 metres ^{closer} than originally approved - 154m, 138m, and 101m.

It should be pointed out that those many neighbours beyond the "nearest receiver" also now have these turbines closer to them by the same distance, with the same negative impacts.

5. Also of concern is the fact that the Developer made these many and often quite significant re-locations without any reference to the Department or Court, and was only called to account after a long period of complaints by impacted local families.

GENERALLY

This Developer consistently failed to comply with

The Construction Conditions of Consent (eg operating hours, noise constraints, etc), its oversize and overmass vehicles have ruined local roads and they now dispute local Council remediation requirements, and they have arrogantly dismissed complaints from local impacted residents ("Prove it" to one complainant).

It is imperative that the Department move quickly firmly, and punitively against this Developer who ignores Conditions of Consent, re-locates turbines at will, and now seeks retrospective approval on questionable grounds.

It is my recommendation that:

- (a) The 3 turbines (Ban. 09, Ban. 15, Pom. 03) that have been moved closer to non-hosts by more than 100 metres be entirely removed and the spoiled site be returned to productive farmland
- (b) The 8 non-host "receivers" who will now have a turbine closer by 50 to 100 metres (Ban. 12, Ban. 13, Aur. 07, Aur. 18, Pom. 04, Pom. 11, Pom. 19, Pom. 22) be offered some significant compensation by the Developer.
- (c) The Developer be required to rebuild the damaged areas of Range Road to the standard required by Upper Lachlan Council's engineers.

FINALLY

This Developer has repeatedly ignored its Conditions of Construction Consent, and treated local complainants with dismissive contempt.

Now, at last, they may be called to account. The significant, unapproved micro-siting changes must not be whitewashed by retrospective approval through this Modification Approval process.

As well, the vote of their representative on the 6-member Community Enhancement Program Committee must be withdrawn or discounted in the event of a 3-all vote, because as a financial beneficiary its representative should not have the capacity to help outvote the representatives of the local families who have been adversely impacted by the project.

This Modification Application must not be determined by the Department, but rather must be a matter for a Planning Assessment Commission Hearing. Further, I wish to address such a Hearing as a member of 3 local Landscape Guardian Groups

Yours faithfully

Malcolm Barlow

(B.A. (Hons), M.A., Dip.Ed. (P.G.), F.N.G.S.)