

"Lachlands"
619 Redground Road,
Crookwell, 2583.
28th Sept., 2016

Mr Neville Osbourne,
Energy Resources Assessment,
Dear Neville,

Department of Planning
Remaixed
1 0 OCT 2016
Scanning Room

Re: Crookwell II Wind Farm Modification;

Crookwell III Wind Farm Approval & Modification.

I wish to object to both the Crookwell II Modification and the Crookwell III Approval and Modification Application in this one submission.

1. MODIFICATIONS SOUGHT BY BOTH PROJECTS.

- 1.1: The developer of <u>Crookwell II</u> seeks to increase the tip-height of the turbines from 127m to 159m, or by **25**%. This is not a minor change, but will result in a major increase in the visual impact of the towers. The developer implies that the reduction in the number of turbines will minimise the visual impact of the higher turbines, but this is not so. The 46 lower turbines with 47m blades had a total blade-sweep area of 319,229sq.m, but the proposed 33 turbines with 64m blades will have a blade-sweep area of 424,643sq.m or **about 33**% more moving machinery in the viewscape, and **33**% more bird-kill area. Where in the Application is there any concern for this increased avian impact?
- 1.2: The modification sought for <u>Crookwell III</u> only increases the blade-tip height from 154m to 159m, but by increasing the blades from 51m to 64m again greatly adds to the blade-sweep area. Even though the number of turbines is to be reduced to 23, the total blade-sweep area would increase by 25% from 236,059sq.m to 295,963sq.m. This, again, is a major impact upon the viewscape especially around Lake Pejar, as well as another increase in the bird-kill area.

Together, the **combined blade-sweep areas of the two projects is sought to be increased from 555,288sq.m to 726,606sq.m – or by 31%** No doubt this will provide the developer with increased income, but at the expense of a more industrialised rural countryside and much greater avian carnage.

2. INAPPROPRIATE SITING OF CROOKWELL III (and Crookwell II)

2.1: The six turbines comprising <u>CIII South</u> are to be located just west of the scenic Pejar Dam water body. Apart from the sheer absurdity of placing a huge and noisy industrial complex next to a beautiful and tranquil lake, these turbines will be a major distraction to motorists on the busy Goulburn-Crookwell Road. As one descends towards the dam a driver's attention is already drawn to look at aspects of the impressive water body, but the giant rotating turbines will also draw the drivers' attention to a different view on the other side..

Overseas, turbines near roads are recognised as a driver distraction, and this worrying matter has not been addressed in this Modification Application. For this reason alone, Crookwell III South should not be approved.

2.2: Many, if not all, of the 17 turbines in <u>Crookwell III East</u> are sited within the E3- Environmental Management zone of the Upper Lachlan Local Environmental Plan 2010. The main Objective of this zone is <u>"To protect, manage and restore areas with special ecological, scientific, cultural or aesthetic values."</u>, and the uses permitted With Consent and Without Consent do not include wind farms. Further, Prohibited Uses definitely rule them out.

Therefore, the Department's earlier recommended approval of the project is not only unsound but arguably illegal. Council's L.E.P. was gazetted in 2010 after almost two years of deliberations, while the developer's final E.I.S. was not lodged until 2012. Both the developer and the Department were well aware that the project was an inappropriate even prohibited project for the proposed site – so why did the developer proceed and why did the Department recommend approval?

Or are we now to have the ludicrous situation where a Departmentapproved Planning Instrument is to be over-ridden on the recommendation? of the very same Department that largely produced and ratified the Instrument so as to facilitate an overseas developer's inappropriate project

3.EXAGGERATED CLAIMS OF BENEFITS

3.1: The developer has made exaggerated claims as to the **long-term employment benefits** that will accrue to the area. The Crookwell II leaflet claims 14 ongoing operational jobs, while the Crookwell III leaflet claims another six — **or 20 ongoing jobs all told**. Cunningly, the blurb avoids the words "full-time" and does not specify from where the employees will come.

The proponent should be made to identify these 20 jobs, and then guarantee their creation as a condition of consent. Otherwise, they are just misleading propaganda designed to win approval for the project, and bear no resemblance to reality as shown by the five already operational wind farms in the Shire.

3.2: Again, as usual, the proponent makes **glowing but misleading claims as to the number of homes that will be powered by the two projects**. The Crookwell II leaflet says the larger turbines will power more than 59,000 average sized households per year, and the Crookwell III leaflet makes a similar claim for 42,000 households – **all told, 101,000 households powered per year** – or seven cities the size of Goulburn!!

The developer has left out such more truthful phrases as "now and then", or "when the wind blows at optimum speed", or "when it is not too hot or too cold for the turbines to operate", or "at twice the price of power from baseload stations", and so on. In short, the proponent should be made to withdraw or at least fully qualify such exaggerated claims that mislead the public.

4. CONCLUSION

There are many other reasons to object to these Applications – the cumulative effect of adding Crookwells II and III to Crookwell I, the increased height and blade-sweep area even further restricting aerial agricultural practices and fire-fighting capacity – but the objections outlined above can be summarised and emphasised as:

- 4.1: Crookwell III should be denied approval altogether because much of the eastern section is in a gazetted zone that prohibits wind farms, and the southern section is too close to and detracts from a major and attractive water body. The southern section also constitutes a dangerous driver distraction to the busy Goulburn Road.
- 4.2: Crookwell II and Crookwell III Modification Applications should be rejected. Despite the reduction in turbines from 75 to 60, there is nevertheless a large increase in the impact upon the viewscape of the area because the 60 turbines are much higher, and because the total blade-sweep area with its moving blades is one-third larger. Where is there any concern shown for the avian impacts of this large increase?
- 4.3: The proponents should be made to withdraw, or plainly substantiate and guarantee, their **exaggerated claims** as to the so-called benefits to the Shire.

(Malcolm Barlow, [B.A.(Hons), M.A., Dip.Ed.(P-G), F.N.G.S]

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P.S. Please adenowledge receipt of this submission.

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