

John Benjamin  
4453 Braidwood Road,  
Goulburn. NSW 2580

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Department Of Planning  
Sydney  
NSW 2000

By e-mail

Submission re Crookwell 2 Modification and Crookwell 3 Amendment Applications (DA 176-8-2004-i MOD 2, and SSD 6695)

#### These Developments Contradict Zoning Aspirations

If Crookwell 3 is approved this will allow for the construction of approximately 17 turbines on land located within the E3 Environmental Management zone of the Upper Lachlan Environmental plan of 2010.

The intent and purpose of the plan is clearly stated:

- To protect, manage and restore areas of high ecological, scientific, cultural or aesthetic values.
- To prevent development that could destroy, damage or otherwise have an adverse effect on those values.

The plan also clearly states what is not permitted:

“Any development not specified in item 2 or 3

2. Permitted without consent

Environmental protection works; Extensive agriculture

3. Permitted with consent

Environmental facilities; Information and education facilities; Roads”

This excludes wind turbines.

Apparently the Department of Planning is taking the position that because the DA for Crookwell 3 was lodged in May/June of 2010 and the gazetting of the E3 Environmental Management Plan did not take place until August of 2010 then it has no choice but to allow for the acceptance of a DA which if approved will degrade an area which by its own admission is of “ high ecological, scientific, cultural and aesthetic value”. It would seem that different sections of the Department of Planning were at cross purposes. One section trying to protect a landscape and another allowing a developer to lodge a DA which if approved will visually destroy the same landscape.

There is also the issue of compatibility with land use and intended outcomes on adjoining land with different zonings. The now proposed turbines that are 157m in height, with a rotor of diameter of 130m, will dominate and impact vast areas of landscape. Areas zoned for their scenic beauty will be visually compromised. The natural state will be dominated by the built state. The visual impact will be totally at odds with the intent of protecting areas of high aesthetic values.

Regardless of the amendment to an increase in the size of the Crookwell 2 & 3 turbines, the impact and connectivity to whatever is built, when collectively viewed with the Gullen Range wind turbines will have a "plantation" effect. The views from Crookwell Road, Range Road and all other secondary roads will be overwhelmingly one of wind turbines. The "Gateway" to the township of Crookwell will be dominated by turbines. Lake Pejar and its surrounding landscape will be dominated by wind turbines.

The approval for Crookwell 2 was granted in 2005 with a condition that the approval was good for 5 years provided a SUBSTANTIAL start was completed within that period. Putting a couple of sheds on site and doing some minor road works does not fulfil this condition and it is obscene that your Department should accept this as such or expect locals not to feel cheated by such compromise. This was not a guideline it was a condition and makes a mockery of the planning process. But not content with that lapse the Department then changes the wording from SUBSTANTIAL to PHYSICAL and withdraws any time condition. Again those to be affected by this development feel betrayed by a planning process where rules are changed to suit developers. Surely it is the role of the department to enforce its own conditions.

### Technology

The developer maintains there has been technological advancement in wind turbines since the original application. This is ludicrous they are simply getting bigger. Real technological change would mean smaller turbines producing more energy. There would be far less impact on people and landscapes, less damage to local roads and a reduction in risks to birdlife not an increase. There would be less noise including infrasound and less shadow flicker and far less imbedded energy. Local fire brigades would feel less risk and more capable of dealing with fires.

### Economic Benefits

The economic benefits are as follows. We dig the holes and then fill them with reinforcing steel and concrete. We then import hundreds of millions of dollars of wind turbine components from Spain, China, Germany or Denmark. This of course goes onto the wrong side of our balance of payments. The ABS shows "The current account deficit, seasonally adjusted, increased \$636m (4%) to \$15,535m in the June quarter". The developer is a foreign company whose profits are remitted overseas, again adversely impacting on our balance of payments. Is corporate tax paid in Australia? Possible, but most probably accounting practices will allow for tax to be paid where the tax rate is cheapest. So after lumbering our current account with hundreds of millions of dollars we end up with maybe 6 Australians in permanent jobs. The day to day operations of the completed turbines will be done from Union Fenosa's computerised office in Spain.

### The Real Cost of community minded wind farms.

The Gullen Range Wind Farm Community Update #8, states that it produced enough electricity in 2015 to power 60,000 homes, based on 18KWh per day for a household of 3 people.  $18\text{KWh} \times 365 \text{ days} \times 60,000 \text{ homes} = 394,200\text{MWh}$ . The 2015 average price for one Large-scale Generation Certificate (LGC = 1MWh) was approximately \$80. The price is currently \$90 per LGC. At \$80 the Gullen Range Wind Farm pocketed \$31,536,000 over and above what it sold its electricity for on the wholesale market. How many Australian scientists and Ph students could we employ for \$31.5 million? About 350, all

working on solutions to reduce carbon emissions. Solutions capable of producing affordable, carbon free base load power.

Aesthetically Destroying the Landscape on the pretext of saving the environment.

It may make financial sense for the developer to build such infrastructure close to power transmission lines, but in a state as vast as NSW it makes absolutely no sense for the Department of Planning to support a development in an area it itself has zoned E3 "high ecological, scientific, cultural and aesthetic value."

What is the point of destroying the very environment we are trying to protect. If allowed this would be a "Pyrrhic Victory".

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