

IPCN Presentation - Crookwell 3

Thursday 6th June 2019

Andrew Bray, National Coordinator, Australian Wind Alliance

Thank you for the opportunity to speak to this IPC panel today.

The Australian Wind Alliance is an advocacy group for wind power, supporting local wind supporters, and seeking the best results from wind farms for local communities. Our members are farmers, hosts, neighbours, wind workers, small businesses and environmental supporters. Many are from this area. We are independent of industry and of Government. We support wind energy, not only for its environmental and climate benefits, but also for the economic benefits that wind farms deliver to Australia's rural and regional economies.

We carefully assess new wind projects, however, to satisfy ourselves they have been developed properly with community stakeholders in mind. As you may be aware, we opposed a wind farm proposed in this region that was ultimately withdrawn, as we found the developer's communication and community engagement inadequate.

In regards to Crookwell 3, we are satisfied that the communication, community engagement and consultation from Global Power Generation has been adequate. Obviously not everyone in the community supports the project, but that's not where the bar for community engagement is set. A wind farm proponent has to be fair, open and transparent and in our observation, Global Power Generation has achieved that.

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I note that we appeared before the last hearing for this project, under the Planning Assessment Commission, in March 2015. As we did that day, we appear today representing those people who don't want to run the gauntlet of a public meeting and may be too busy, nervous, or shy to present in person.

Today, I would like to challenge the Department of Planning and Environment's (DPE) recommendation to refuse the development application for Crookwell 3, on the following grounds:

- The Department has overstated the visual impacts of the project, particularly in regard to landscape character, going beyond the standards set in its own 2016 Wind Energy Guidelines.
- It has cited local government zoning and DCPs that are not appropriate in this decision
- It has understated the need for new renewable energy projects like Crookwell 3.

The Department's discussion of visual impact goes to two separate issues - landscape character and visual impacts on residences.

Any discussion of these issues needs to remember that many people - perhaps a majority, it's hard to quantify - quite like the sight of wind turbines. The slender form and slowly spinning blades are pleasing to watch and give these people a sense of a cleaner future. While it's not a universal reaction of course, it should temper consideration of what the NSW Wind Energy Guidelines bluntly refer to as 'visual impact'.

- Landscape character & landscape features
 - In its report, the Department states that building Crookwell 3 “would result in turbines covering an arc extending more than 10 km along the main ridgeline on the approaches to Crookwell.”
 - It needs to be noted that 10 km long wind farms are routinely approved in New South Wales, as well as other states.
 - The Sapphire and White Rock Wind Farms, both approved in recent years, both extend over more than 10 km of ridgeline. Together they cover a distance of over 20 km across the Gwydir Highway, a road certainly as picturesque and well-used as the approach to Crookwell.
 - Closer to here, the Gullen Range and Capital/Woodlawn Wind Farms are also more than 10 km long across their ridgelines.
 - A 10 km long wind farm is not a particularly prominent wind farm. It is not an intrusion on the visual character of an area and it should not be a contributing factor in rejecting a wind farm.
 - The report goes on to state “there are also a number of other wind farms visible from the site and surrounds, including the Crookwell 1, Gullen Range and Gunning Wind Farms.”
 - While Gullen Range Wind Farm is indeed visible to the west, we shouldn't overstate it's presence. As the NSW Wind Farm Guideline's Visual Bulletin acknowledges, “At eight kilometres, turbines and objects recede into the background in terms of visibility”. Most of the receptors listed in the report appear to be more like 10 - 14 km away from Gullen Range. (While I'm happy to be proved wrong, the distances listed on Table 3 of the Department's report appear too low, in that a cross-check on Google Maps suggests receptors are much further from actual turbines in these wind farms than the Table suggests. I wonder if the Department has measured to site boundaries rather than turbines?)
 - Similarly, Crookwell 1 is on a much smaller scale than the modern turbines we're discussing and really, it's hard to understand why the Department mentioned Gunning Wind Farm, which, over 20 km away and nestled behind Gullen Range, is barely visible. To see ambit claims like this in a Departmental recommendation is really very disappointing.
 - We would argue that the Department's report effectively exaggerates the impact of the Crookwell 2 and 3 projects on the landscape character as a contributing reason for refusal of the project.
- Visual impacts on local residences

- It is our understanding that some of the residences in the DPE assessment are not occupied, or are incorrectly identified with regard to whether they are associated or not.
 - The developer has advised that 80% of the residents within 2 km of the wind farm have entered into neighbour agreements. We understand that further negotiations with some neighbours remain ongoing.
 - There are approximately 76 residences within 5 kms of a turbine that are not associated with either Crookwell 2 or Crookwell 3 wind farms. Of these 76 residences DPE only received 15 submissions opposing the project.
 - That suggests there are a further 60 households who weren't sufficiently concerned to bother submitting. This should give the panel pause to consider that the opposition evident from some local residents is not at all proven to be widely-held in the area.
 - Here we should note that the Wind Farm Guidelines do not include a 'veto' provision for near neighbours. The Guideline's approach is certainly more appropriate than the Upper Lachlan Shire Council's 2010 DCP, which states "turbines shall not be located within 2.0 km of any dwelling not associated with the development".
 - It is reasonable that a developer offer near neighbours a fair process and a fair offer for any agreement. A neighbour, of course, may refuse to accept the offer but this, on its own, should not stop the project going ahead, as the DCP suggests.
 - We don't believe that refusal of those neighbours to accept an offer of an agreement should preclude a project from going ahead.
 - We would prefer to see the project proceed, but with voluntary acquisition rights for those neighbours who have chosen not to sign a Neighbour Agreement.
- Regarding the zoning, we argue that considering the E3 zoning for Crookwell 3 is inappropriate and contradictory. More than half of the Crookwell 2 wind farm sits on the same E3 zoned land, and this was approved by the Department, long after the 2010 LEP was adopted.
 - In truth, the land in question is predominantly cleared farming land, used for grazing for more than 100 years, so the environmental zoning itself is highly questionable.
 - Also bear in mind that additional income to the farmer allows them to get better environmental outcomes by easing financial pressure to overstock and to finance land improvements.
- We also challenge the Department's claim that NSW doesn't need this project.
 - Firstly, Crookwell 3, while it only consists of 23 turbines, will produce a significant amount of electricity - 275 GWh per annum - because at 4.2 megawatts, its turbines will be the largest and most efficient in the country.

- By way of comparison, the state's first large-scale wind farm, the Capital Wind Farm, has 67 turbines but only produces 214 GWh, which is 20% less than Crookwell 3, but using 3 times the number of turbines.
- In gauging the need for new renewable energy, the Department relies on unambitious federal and state renewable energy targets that do not reflect the urgency of tackling climate change. We should assume these targets will increase dramatically in coming years.
- Further, it ignores the significant commercial pressures on existing black coal generators that could see them close much earlier than the slated 50 year design lives, further driving demand for new projects such as Crookwell 3.
- The project is uniquely placed to proceed quickly to construction, which places it at a distinct advantage to many other projects at this stage of development. It has ready access to transmission connection, which is already in place for Crookwell 2, which is proving a large and lengthy hurdle for new wind projects in the state.
- The large pipeline of projects listed on p17 of the report obscures the fact that with the 2020 Renewable Energy Target now effectively complete, there are no additional schemes in New South Wales to propel projects to construction.
- Local economic benefits
 - Work on Crookwell 3 would be a shot in the arm for local businesses. Just the civil construction component of Crookwell 2 Wind Farm was shown to have delivered [\\$12 million into local businesses and \\$14.5 million across the Capital region](#).
 - The Wind Farm will contribute over \$500,000 annually by way of rent, neighbour agreements and community benefits scheme.
 - These benefits should not be discounted in the panel's consideration.

In summary, we argue that the Department has exaggerated some of the main impacts of the project and cited inappropriate local government requirements, while underestimating the project's value to the states renewable energy needs. This has led the Department to misjudge the balance of impacts vs benefits. We argue that the project should be given permission to proceed on the conditions discussed above.