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# **Submission**

to

## **NSW Department of Planning and Infrastructure**

[innovation@planning.nsw.gov.au](mailto:innovation@planning.nsw.gov.au)

on

## **Draft NSW Guidelines for Wind Farms, December 2011**

Compiled for Clarence Environment Centre  
by John Edwards  
Honorary Secretary  
24<sup>th</sup> February 2012

# **Submission to NSW Department of Planning and Infrastructure on Draft NSW Guidelines for Wind Farms, December 2011**

## **Preamble**

The Clarence Environment Centre has maintained a shop-front in Grafton for over 22 years, and has a proud record of environmental advocacy. We believe that climate change is real, it is human induced, and that greenhouse gas emissions from the burning of fossil fuels for electricity generation is the main contributor worldwide.

We note that State Government also believes that Climate Change is real, and that renewable energy, and emissions reduction targets must be met. However, in light of the International Energy Agency's (IEA) 2012 "World Outlook" report, we believe all possible efforts should be made to encourage the introduction of all forms of non polluting renewable energy as a matter of urgency.

The IEA's latest outlook report clearly stipulates that continued business as usual sees the world on track for 6°C temperature rise within the next 90 years.

The IEA now flags the fact that the situation is so dire that, under the 450 scenario (limiting greenhouse gas emissions to 450 parts per million), the global carbon budget will jump from 80% to 95% in just 5 years. This means that only emissions-free generation plants should be built after 2017 if catastrophic climate change is to be avoided. To achieve this, the IEA identifies a clear need to reduce coal-fired electricity by 60%, and gas-fired by 4% by 2035.

Therefore, the provision of renewable energy is at the very core of the solution to global warming, and the reason we are compelled to comment on the White Paper, albeit in general terms.

## **General observation**

The release of "Draft NSW Guidelines" document was the first inkling by the Clarence Environment Centre of its being prepared. However, the document claims, (page iv) it was compiled "*in consultation with the community and energy industry*". However we are unaware of any community consultation prior to its release, and believe that had environment groups been consulted, and their views considered, the "guidelines" would have been significantly different.

## **2km buffer allowance**

While the Clarence Environment Centre strongly supports the rights of residents that are affected by any development, we nevertheless believe the mandatory 2km radius, within which additional assessments are required, is excessive. This is particularly so when we consider that a coal seam gas well head, a highly polluting competing energy industry, can be located on landowners' properties, as close as 200m from their homes without any recourse for those residents.

The proposed 35 decibel limit proposed for wind farms, which is way below world standards, is shown in Figure 2 on "conservative estimates" to be reached at less than 1.5km from the wind farm. Figure 2 confirms that: "*In NSW noise setback distances typically vary between 0.8 – 1.5 km due to project and site-specific factors such as turbine configuration, design, intervening topography and vegetation.*" Therefore, we believe the 2km clause should be reassessed and the distance halved.

## **The fear campaign**

There are some that question the effectiveness of wind power, so we point out that wind is now a major provider of base-load electricity in several European countries. In South Australia, that State's greenhouse gas emissions have declined by 20% since 2005/06 while actual energy use has increased. The major contributor to that drop has been wind turbines.

There are fears expressed that wind turbines have detrimental health effects. However, to date there has been no evidence found to support that claim. While that comment smacks of the tobacco industry, we point out that, if there were any proof of negative health aspects, the cashed-up fossil fuel industry would have found it and used it for all it is worth.

In fact, around the world, we understand there have been 17 major reviews of the possible health impacts of wind farms, and there has been no link found between them and physiological health problems. Fossil-fuel alternatives however, particularly coal, have killed or shortened the life span of hundreds of millions around the world over the past 100 years.

There have been exaggerated, and largely unsubstantiated claims that wind farms kill large numbers of birds. However, these deaths are nothing compared to the mass extinctions of all species that will occur if climate change is not addressed.

At the same time, wind farms benefit local communities with employment, not just during construction, but also provide ongoing skilled jobs; community funds, and payments to landowners who host turbines.

## **Consultation**

While the community received little or no consultation in relation to the preparation of the “Guidelines”, the document does demand the formation of a Community Consultation Committee (Appendix C). When we consider that Red Sky Energy, which is now seeking approval for the second stage of its coal seam gas project near Whiporie north of Grafton, with no consultation with environment groups (the Clarence Environment Centre has already complained to the Premier about this matter), this requirement appears ridiculous in the extreme. NSW needs a consistent planning regime for all energy developments.

There are already consultation requirements in place which any developer should follow, so we ask that the highly onerous Community Consultation Committee, that will impose on both the community and the developer, be scrapped.

We thank the Minister for this opportunity to comment, and hope that at least some of our concerns our suggestions are taken seriously.

Yours sincerely  
John Edwards  
Honorary Secretary.