

Director – Energy Assessments
Development Assessment
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124


Attention: Iwan Davies, Contact Planner

RESPONSE TO the “Environmental Impact Statement” and associated documentation
for the proposed Winterbourne Wind Farm project near Walcha
Application Number: SSD-10471 EPBC ID Number: 2020/8734

SUMMARY

1. I concur with Adam Marshall MLA’s assessment at the recent Walcha community meeting that ‘this is the very worst EIS I have ever, ever seen’
[New England Times, 18 January 2023].
2. I OPPOSE any approval of this project on the following grounds:
 - a. totally inappropriate choice of site with insufficient justification;
 - b. too large and too close to Oxley Wild Rivers National Park;
 - c. inadequate community consultation and insufficient community support;
 - d. appalling lack of indigenous consultation and local historic research;
 - e. insufficient and contradictory biodiversity survey data;
 - f. total disregard of ecological impacts except in biodiversity ‘offset’ terms
 - g. fatally flawed fire hazard assessment;
 - h. poor understanding of local wind and dust conditions;
 - i. misleading underestimation of project water requirements;
 - j. unrealistic overestimation of economic benefits to community;
 - k. underestimation of road and traffic disruptions for the project;
 - l. significant drain of local resources such as gravel;
 - m. insufficient planning for construction workforce housing;
 - n. significant negative visual and tourism impacts; and
 - o. poor planning for project decommissioning

I declare that I have made no political donations in the past two years.
I have read and understood the Department’s Disclaimer and my comments are based
on honest opinions and particular concerns about the suitability of this project for
approval.



OBJECTIONS TO WINTERBOURNE WIND PROJECT SSD-10471

1. OVERALL COMMENTS

Several thousand pages of repetitive and inconsistent information reads more like an Ecological Insult Situation than an Environmental Impact Statement.

The document appears to be primarily drafted from a Sydney desktop based on general assumptions from standardised modelling rather than detailed local consultation, surveying and ground truthing.

As such, it fails to meet the intent of our environmental laws as the proposed activities are likely to irreversibly damage sensitive and irreplaceable ecological communities and threatened and endangered species as well as presenting unacceptable risks to local communities, particularly from fire hazards. In my opinion, the proposal is an unsustainable travesty of ecological and legal principles and should not be allowed to proceed.

2. SITE ISSUES

Proximity to infrastructure

The proponents' arguments for selecting this particular site are at best flimsy. There are thousands of hectares of grazing land in the New England REZ area, many farm parcels much closer to existing transmission infrastructure, major roads and resources such as quarries.

Strong prevailing westerly winds are available at many of these places without compromising ecological values. For example, there is suitable land at Metz, with existing transmission lines, reliable winds, at least one nearby quarry and existing road infrastructure.

Risks to ecological values

The proposed site is too close to the Oxley Wild Rivers National Park, Apsley Falls and the World Heritage Gondwana Rainforest. The ecological importance of these areas is far too great to be put at risk for such a resource intensive and potentially hazardous project. The potential ecological (and tourism) costs far outweigh the benefits of locating the project at the headwaters of the gorge.

The Macleay is the seventh oldest river system in the world.

The ecology of the gorge is complex and contains a multitude of microclimates and niche communities of both flora and fauna. Much of the gorge country is effectively inaccessible to humans, and consequently barely disturbed. Mining at Metz and Hillgrove and agricultural erosion in various localities have been problematic but much of the Macleay gorge country is still a true wilderness: one of the last ancient landscapes still (almost) intact.

It is worth much more than a one off payment of \$64 million for a few eagles and koalas.

Fire and Other Hazards

“As the Project is a SSD, Section 4.41(f) precludes the Project from requiring a bushfire safety authority under section 100B of the *Rural Fires Act 1997*.” [Appendix L, page 8]

The gorges do not behave like the pretty desktop models of less rugged topography that the EIS seems to rely on to claim minimal bushfire hazards and mitigation requirements set out in the RFS Planning for Bushfire Protection Guidelines..

The gorges produce their own weather, with cloudy mists or hot dry winds whirling up and down the cliffs and gullies, regardless of the prevailing winds across the broader landscape. Lightning strike fires are common: most are quenched by subsequent rain, but some lightning struck trees smoulder for days until drier winds carry embers to more volatile fire fuel.

Fires quite literally leap out of the gorge, up onto farmland, or wind turbine infrastructure, the fire doesn't care. Embers travel great distances, sparking fires several kilometres from the original outbreak.

The 2019-20 Carrai Creek fire/s started over thirty kilometres east and overtopped the gorge at Enmore and near the project site. Another arm of that fire burnt through the National Park section on Long Point Road, threatened farm lands and came within seven kilometres of Hillgrove.

The project site has several possible sources of fire as identified in the EIS.

Placing turbine infrastructure within two or three kilometres of the gorge is asking for trouble. As this project stands, turbine towers will be placed within two (or was that five?) hundred metres of the gorge and the national park boundary.

This is far too close and residents in the gorges area may be put at greater risk by any fires arising in the proposed project site. Given the prevailing westerly winds, there is insufficient buffering between proposed turbine towers and both National Park and rural landholding assets.

The proponents claim that 20,000 litres of onsite water storage for fire fighting is sufficient for their 4426 hectare project site, while rural village small lot landholders in the region are required to have a dedicated 10,000 litre tank for exclusive RFS use.

[Appendix L Bushfire Risk Assessment, page 41: “In accordance with Section 5.2.2 a water supply no less than 20, 000 litres (stored in a non-combustible storage tank), shall be provided in accordance with Table 7.4a of PBP”.]

2,000,000 litres might be more appropriate, given the scale of the project area and the risks to physical, environmental and human assets.

One must ask:

If a koala is worth a mere \$200, how much is a farmer worth? Or a firefighter?

3. COMMUNITY ISSUES

a. Indigenous consultation

The proponents wrote one letter to each of the identified relevant local Aboriginal groups and left it at that? Why was there no follow up? Did the proponents employ an Aboriginal liaison officer to ensure that communications were culturally appropriate?

Indigenous artefacts are identified on the EIS maps (with photographs, which may not be culturally appropriate) but no explanation of their significance or otherwise to the local peoples, or their broader historical importance.

Were any books consulted that might have outlined local post-colonial history? Were there any massacre sites identified on the proposed project footprint?

(For example, check *Surviving New England* by Callum Clayton-Dixon.)

b. Wider community consultation

The proponent has set up a shop front in Walcha that operates during business hours and has held stalls at weekend events in Walcha. Minimal consultation compared to some other REZ project proponents, such as the Oven Mountain PHP, that have consulted broadly from Armidale to South West Rocks with an informative and accessible website.

The fact that there is a dedicated group opposing the Winterbourne project and a community survey in September/October 2022 registered 80% of over 500 respondents against the project, suggests it is not widely supported.

4. RESOURCE IMPACTS

The proponents significantly underestimate the amount of water they will need in the construction phase of the project. There is a risk that they will drain local supplies leaving shortfalls for other purposes, including environmental needs. There will also be a significant drain on other resources, such as gravel for roads and concrete, and accommodation for workers.

5. BIODIVERSITY ASSESSMENT ISSUES

Where do I start?

The Biodiversity Assessment Report is a nightmare. The proponent's ecologists seemed to be more interested in calculating the dollar value of "offsets" for rarer species than properly surveying them in the right seasons in the right ways.

Effects of the 2019-2020 drought

The BDAR (Appendix G) correctly states that 2020 rainfall was above average and that winter rainfall in 2021 was below average. However, the assumption that data since December 2020 was not drought affected is, at best, naïve. Recovery of both flora and fauna can take several years, especially as fauna is dependent on flora to rebuild populations reduced by the drought.

The proponents provide no evidence to support this assumption. “The drought is not likely to have significantly impacted upon the credit generation across the development site.” (BDAR, page 43)

No fieldwork was carried out at all during the winter months. The bulk of the survey work was undertaken in October and December 2021 (630 and 993 of 2663 hours) following that drier than usual winter. This was inadequate to identify species known to occur in the area.

A “grand total” of 2663 hours of survey work across 4426 hectares of project site amounts to 36 minutes per hectare. The entire project area is 22,285 hectares, spreading that minimal effort even further

Searches for vulnerable and endangered frogs were perfunctory, with very few survey nights per site for frogs over 9 days in December 2021. Frog breeding in the seasons since the drought broke have not been typical of previous years, partly due to the slow and variable recovery of insect prey for both frogs and tadpoles and partly due to cooler summer seasons. Further surveys in January and February might have yielded different results.

A similar situation exists for the rare orchids with unseasonal flowering both earlier and later than usual observed at Metz (roughly 20 km across the gorge) for many species.

Hollow-Bearing Trees

Several rarer species require hollow-bearing trees (glossy black cockatoos, among others).

The paucity of surveying of these hollow-bearing trees and the species that use them means that the negative impacts of the proposed development may be greater than claimed.

Appendix G Biodiversity Development Assessment Report baldly states: “Hollow-bearing tree mapping across the development site was not exhaustive. Of those that were mapped, according to GIS, 29 would be removed.” [BDAR, 7.1.3, page 156]

And: “Twenty-nine HBTs are known to be likely removed as a result of the Project. Of these, it is possible that some provide roosting, denning or breeding habitat for wildlife which are part of the World Heritage biodiversity.” [BDAR, Table 7.6, page 183].

The EIS states an intent to relocate some turbine towers and infrastructure to reduce impacts on vulnerable populations, but these minimal accommodations do not go far enough.

In my opinion, if the project must proceed, the entire south-eastern arm of the proposed project abutting the Oxley Wild Rivers National Park should be excluded from the development. This exclusion would protect significant ecological values, increase fire hazard buffers and significantly reduce the number of turbines, remove the need for a second substation and reduce the resource burden for roads and other project infrastructure. Ideally, the project proposal should be refused altogether.