

17/12/2023

Todd and Justine Clarke

86 Rockford Lane

Yarrabin, NSW, 2850

Department of Planning & Environment

Attn: Natasha Homsey

Dear Ms Homsey,

Burrendong Wind Farm (SSD-8950984) – EIS comments

We wish to provide our strong objection to the Burrendong Wind Farm (SSD-8950984) project in its current layout and provide comments on the adequacy of the Environmental Impact Statement (EIS). We recognise that the proposal is for the construction, installation, operation, ongoing maintenance and decommissioning of up to 70 wind turbines, each up to 250 m in height, with an expected capacity of between 400 - 500 Mega Watts (MW).

As neighbouring landholders to the proposal, within the blue impact area make the following comments on the EIS and supporting studies.

Social impacts and community concerns

The concerns of the community have not been adequately assessed by the project. The EIS notes the proponent has been proactive in responding to community and environmental concerns by changing the project design, however this does not address the concerns. The community concerns not adequately addressed include:

- Impact to property values
- Water quality impacts
- Visual impacts to all potentially affected properties
- Noise impacts to potential future dwellings
- Dust
- Cumulative impacts

Table 6-1110 provides an assessment through the proponents lens, without sufficiently addressing the concern, or providing a mitigation that is suitable to meet the concern. The social impact mitigation measures (6.13.3) do not reflect the desired mitigations.

It is unclear in the EIS how the removal of over 50 WTGs is as a result of community consultation. The EIS advises that a cluster of 35 WTGs were removed due to noise impacts. It The EIS does not detail why certain locations were selected over others and why the other turbines were removed. Therefore, it is miss leading that they say it was all because of community consultation. The proposed layout should be justified.

What value will a community engagement and communication strategy provide? Nothing. All it will do is tell us what is happening and what stage the project is at, with no community benefit. That is because there are no solid mitigations proposed that provide a benefit to the local community. There are definite benefits from renewable energy projects, but at the expense of the local community. I disagree that the local community will receive economic benefit, in the form of jobs for the community, as most roles will be sourced outside of the local community.

Property values

Wind turbines in a rural landscape will undoubtedly alter the existing landscape character of the area. Rural residents (and potential future residents) will experience a reduction in their enjoyment of their home and property. There is an inevitable loss in property value associated with reduced visual amenity. Whilst it may not prevent the sale of an agricultural property, it will attract fewer potential buyers for the smaller scale hobby farms that are prominent in Yarrabin. This will result in less competition and ultimately a reduced property price/value of those smaller holdings. Only the impact to larger agricultural properties was even considered in this assessment. Just because there is lack of evidence to confirm or deny property value reductions, is not sufficient grounds to dismiss the impact. Therefore, further detailed assessment as to the impact of smaller properties in Yarrabin and surrounds must be further considered.

Soils, surface water, groundwater and aquatic ecosystems

The Project is situated within the Burrendong Dam water catchment area, with project surface water runoff draining to Lake Burrendong either directly or via its tributaries. It is noted that the dam's main purpose is for irrigation, livestock and household drinking water needs within the Macquarie Valley.

The project is located on highly erodible soils, with the EIS rightly identifying a high erosion risk. The steep slopes associated with the project area, including WTG placement and the creation of access roads increase the risk of erosion and sedimentation. The proximity to drainage lines and significant water courses in the area means the risk of disturbed soils leaving the project area and moving downslope into the receiving waters of Burrendong dam are high. This will then impact on the aquatic ecosystems and water supplies, blocking stream flow or altering flow paths. Water availability in rural areas is of major concern and minimising any impacts to receiving waters is of significance.

The EIS included an assessment of the potential impacts on the quantity and quality of surface water and groundwater within the Burrendong Water Catchment Area, however, there is no identification of where the potential detrimental water quality impacts will occur. This is of significant concern, as the Meroo river, and all other tributaries leading into Burrendong dam could be impacted through sedimentation and contamination.

The EIS found that impacts will occur within the Burrendong Water Catchment Area, with the greatest impacts being erosion and sedimentation, water availability, and potential pollution on watercourses during construction. Pre and post development calculations (Table 6-98 of the EIS) show that there is a significant increase in the sediment runoff from the Project.

Adversely, the safeguards proposed to mitigate the identified impacts are generic, with no detail provided on specific mitigation measures required for this project, corresponding to the identified impacts. Therefore, the identified risk has not been reduced, and the residual risk is unacceptable.

Landscape and visual amenity

There is unassessed impact on future dwellings and properties with dwelling entitlement. All the properties not yet with dwellings, but have the potential for, that will be impacted by the project, should be assessed by the project. As a landowner along the Meroo river and primarily affected by the WTGs along the Meroo/ Worlds End ridgeline, it is considered that the impact on my property, because it does not yet have a dwelling, is unassessed. We do plan on building (with our dwelling entitlement, subject to council approval) and have determined that this project will impact on our visual amenity by changing the landscape character, as the WTG will dominate the landscape, turning natural rural landscape views into a mechanical built form, as well as the considerable environmental impact to the lands and waters of the area.

It is evident from the visual assessment that there is a large cluster of properties (assessed by the project) affected by the project within the blue line (within 3350m – 4950m) around Yarrabin and Worlds End. The assessment indicates 4 non-associated properties within the black line (within 3350m of a WTG) and 16 non-associated dwellings within the blue zone. This does not consider the number of properties affected that could have a dwelling and be affected by the project. Nevertheless, this is a significantly high number of neighbouring affected properties, when compared with other wind projects within the Orana REZ (Uungula & Crudine wind farms). It is noted that the WTG placement and project footprints for Uungula & Crudine wind farms positions them in locations that have a low density of existing dwellings, larger land holdings and away from community centres, thus significantly reducing the impact.

The only way to mitigate this visual impact across the landscape on current and future dwellings is to remove the WTG from the proposal that lie along the Meroo/ Worlds End ridgeline (WTG 49-61). Due to the number of clustered properties affected by this proposal, it is recommended that the WTGs along the Meroo/ Worlds End ridgeline be removed from the proposal.

The impact on ALL potentially affected properties should be taken into consideration by the Department. Cumulatively, when considering the existing cluster of affected properties and then including all the other affected properties the sheer scale of affectation should render the projects impact too great.

Dust impacts

Air quality impacts from the increase in dust within the environment has been underestimated. It is unacceptable to have daily dust limits exceeded. The excavations required for the turbine footings, access tracks, stockpiles and load hauling, in friable soils will increase the generation of dust particles. Mitigation measures proposed are not adequate to reduce this impact.

Noise Impacts

There is no certainty or transparency in relation to any of the noise predictions contained in the noise assessment due to the potential for the chosen turbine locations to change (micro siting).

Any approval must be conditional that the proponent demonstrates to the satisfaction of the Department and the NSW EPA that the sound levels in the finalised layout will be at or lower than in the EIS. This condition must be satisfied before construction can commence. With an operational noise management plan prepared and implemented. Any exceedances should be recorded and reported to the NSW EPA with requirements to reduce exceedances.

Bushfire

The EIS significantly underplays the vegetation cover within the project area and surrounds as modified agricultural lands and isolated areas of vegetation. This is not the case. The area is considerably vegetated with enough vegetation cover, both in grasslands and forest to make the risk to property and life high. There is considerable vegetation for a bushfire to take hold and run across the landscape. There was a recent example of a landscape scale fire in the region (Hargraves towards Grattai) that was not mentioned in the EIS. Only that there is a lower risk of bushfires impacting the project site (it does not mention the impact to surrounds).

The project only increases the risk of bushfires occurring in the area through electrical and mechanical faults, or arcing. In addition, the risk of a major fire spreading either from the Project or through the project area towards Mudgee (with predominant west to south-westerly winds) is possible.

The EIS concludes that the project will have potential benefits to tackling bushfires, via better access routes and reduced vegetation that could catch fire. This is counter intuitive to the insurmountable documented impacts to water and biodiversity through the removal of vegetation from the project. In addition, if bushfire was to impact our community suppression efforts would be hampered and aerial firefighting will be impeded by the WTG, increasing risk of loss of life and property damage. As mentioned, the cluster of properties around Yarrabin and Worlds End would be impacted greatest. If the significant risk to property and life is to be avoided, the WTG should be removed from the Meroo/ Worlds End ridgeline.

Landuse Impact assessment

The SEARs required the proponent to 'Assess the potential impacts of the development on existing land uses on the site and adjacent land'. Although the EIS acknowledges this requirement, it primarily considers the impacts to the large-scale agricultural enterprises in the area and not the smaller landholdings. Therefore, the EIS is deficient in its assessment of impacts to landuse.

The proponent must demonstrate consideration of any all direct and/or indirect impacts to adjacent lands.

Cumulative impact

It is recognised that the Orana REZ was created to ensure reliable supply of electricity back to the areas of highest consumption (i.e. the cities) outside of the REZ itself. We support renewables, however it is evident that the determining authorities are not considering the cumulative impact of allowing so many renewable projects into one area. The project EIS has indicated that there are 14 other renewable energy projects at various stages of development within the REZ and LGAs. Figure 2-5 of the EIS document is deceptive in showing all of the renewable projects and their impact area. By just including a symbol and not the impact area of each proposal it simplifies the impact and depicts the projects as widespread. However, when all the impact areas are overlaid, they are close together.

Further, a number of projects (currently proposed and publicly known) are not listed in the EIS, which have the potential to increase the impact on the communities of Yarrabin, Worlds End, Hargraves Hill and Cudgegong River Valley. This includes the Phoenix pumped hydro and Paimbong wind farm. Who considers this cumulative impact of all the projects? If these projects are not listed, what other projects are in the pipeline that the community are unaware of that will impact our lives and the environment.

The NSW Government and the Proponent must be transparent on not only the cumulative impacts arising from this project, but look at the impacts to the environment and residents holistically. This means providing oversight for all (planned, approved, future) renewable projects within the Orana REZ.

We reserve the right to submit further material to support this objection.

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