

Department of Planning and Environment
GPO BOX 39
SYDNEY NSW 2001

Attention: Tatsiana Bandaruk
Your Reference SSD-10807896

[Thunderbolt Wind Farm | Planning Portal - Department of Planning and Environment \(nsw.gov.au\)](#)

Dear Sir/Madam,

TAMWORTH REGIONAL COUNCIL SUBMISSION – STATE SIGNIFICANT DEVELOPMENT – THUNDERBOLT WIND FARM (STAGE 1) - NEW ENGLAND HIGHWAY, KENTUCKY, APPROXIMATELY 50 KM NORTH-EAST OF TAMWORTH

Ref: SL/GV Document Set 1250939

I refer to your correspondence received 24 April 2022 giving notice of the public exhibition of a state significant development, Thunderbolt Wind Farm (Stage 1) (SSD-10807896). Thank you for the opportunity to provide comment on the proposed development, please find Tamworth Regional Council's comments on the proposal below:

General

Tamworth Regional Council (TRC) is generally supportive of renewable energy initiatives. The Proposal is a large renewable energy development and therefore has relevance at a global, national and regional scale. This Project follows the trend (mega-trend) away from fossil fuel and toward renewable energy power generation.

The TRC Blueprint 100 Document Part 1 (Action 6.5) and Part 2 – Local Strategic Planning Statement identify renewable energy as being important issues and goals in the region. This is also in accordance with the Department of Planning Industry and Environment New England North West Regional Plan 2036 which identifies the potential for the region to become a renewable energy hub of NSW.

It is noted that the Thunderbolt Energy Hub Project has been split into two separate stages meaning that Stage 2 will be the subject of a separate development application. TRC notes that will have another opportunity to comment on the potential impacts associated with Stage 2.

TRC recognises the potential benefits to the community for a project of this scale which is for 32 turbines at a capital investment cost of \$373 million. Economic benefits are identified through various commercial opportunities, a neighbourhood sharing program, community benefit fund and the potential for job opportunities. TRC is therefore very mindful of the potential opportunities available to its community if a development of this nature was to proceed.

With this in mind, TRC wishes to raise the following comments regarding this specific proposal (Stage 1 of the Thunderbolt Energy Hub):

Relevant Issues/ Issues of Concern

1. Biodiversity Impacts

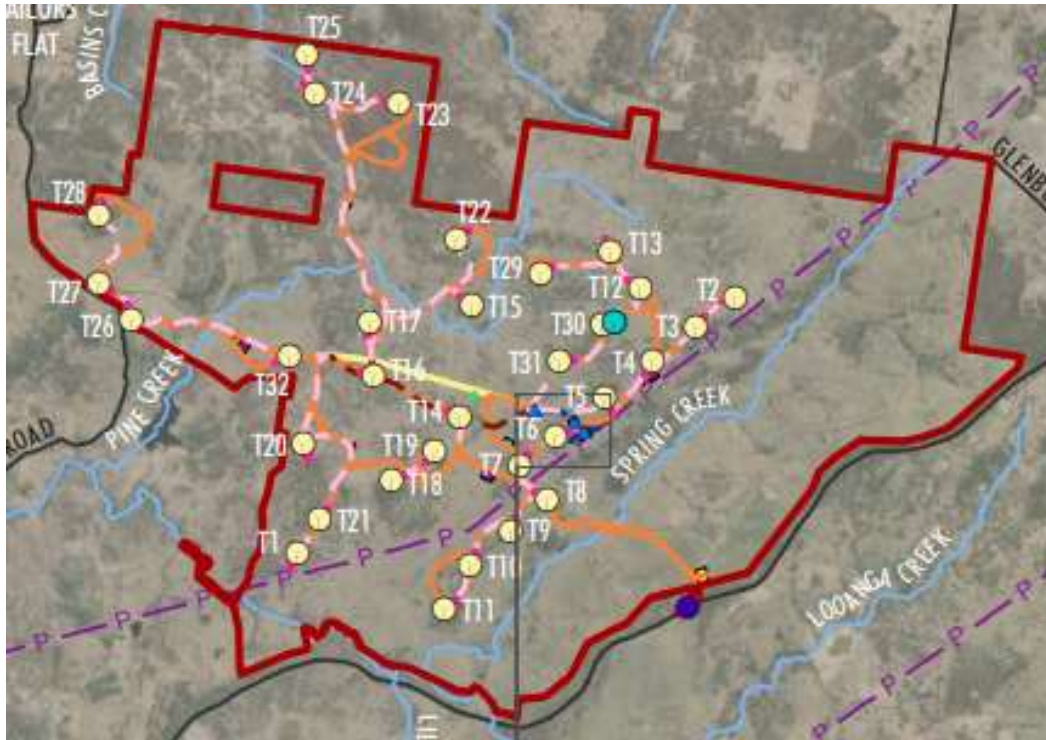
Council have reviewed the documentation relating to biodiversity and concur with many of the comments raised by the Biodiversity, Conservation and Science Directorate (BCSD) in their submission dated 24th May 2022.

As identified by BCSD, further assessment and documentation is required in a number of areas as follows:

1. Addressing key requirements of the Biodiversity Assessment Method (BAM) such as predicting and mapping the habitual flight paths for nomadic and migratory bird species likely to fly over the proposed development site. Mapping of the likely habitat for resident threatened aerial and raptor species is also required.
2. Preparation of an updated Biodiversity Assessment Report (BDAR) addressing the proposed mitigation measures for impacts such as blade strike and barotrauma plus options to compensate for unavoidable impacts.
3. Conducting further bird and bat utilisation surveys (including consultation with bat experts).
4. Reviewing and recalculating the biodiversity credits following completion of an updated BDAR.
5. Ensuring that proposed mitigation measures and adaptive management options adequately address potential impacts on biodiversity.

Furthermore, TRC requests information in relation to the following:

- Has sufficient information been provided with regards to the construction of the turbine concrete foot pads, what likely impact (in any) is there on ground water?
- Has the proponent considered whether the proposed development will have any impact on the native bee population in the area?
- The NSW government has developed the NSW Koala Strategy (through the NSW biodiversity trust), which is designed to support private landowners to protect important areas of koala habitat and support dozens of other plant and animal species. Has this Strategy been considered in the development of this project?
- TRC is also concerned about the clearing required for this development, particularly at the northern end of the Project site which appears to contain relatively undisturbed vegetation in comparison to a large portion of the subject site. For example, TRC notes the turbine sites; T25, T24 and T23 (see map below) will result in significant vegetation clearing for vehicle access and building footprints.



2. Community Benefit Fund

The Proponent has proposed a Community Benefit Fund that will commence once the Project is operational and is proposed to provide \$100,000 annually based on the current size of the Project. TRC would like to make sure the local community benefits as much as possible, as they will be directly impacted in some way as a result of this new large scale industrial activity operating within an existing agricultural area.

TRC would like to ensure funding is appropriately allocated, and therefore request further discussions with the Proponent to determine whether the proposed Community Benefit Fund is appropriate, how the funding will be managed and whether a VPA should be initiated for the Project.

3. Nearby Residential Receptors

Consideration must be given to all existing adjoining and nearby properties most likely to be affected by noise, traffic, visual impact, dust and infrasound.

TRC requests further information in relation to the following:

- Council has received representation from a number of community members expressing concern the development will have a negative visual impact on the local community. Council maintains that as a minimum, the proponent be required to consider clustering/reduction of turbines to achieve a reduction in the visual dominance of the wind turbines.
- TRC would like Neon to consider tree lining along boundaries or areas where the visual impact will be increased.
- Regarding wind turbine infrasound impacts. Is there data on whether it impacts human and livestock health?
- Concerns have also been raised in relation to the impacts from aviation obstacle lighting and shadow flicker.

4. Decommissioning / Waste Management Plan

TRC understands that costs associated with the decommissioning of a wind farm can be very high, which increases the risk of an inadequate removal process should the operation cease to continue and inadequate decommissioning controls are in place.

TRC is of the view that the decommissioning and waste management aspects of this proposal does not provide enough answers as to how appropriate decommissioning and waste removal will be achieved during all stages of the development (construction/operation and decommissioning).

The Proponent has indicated that a decommissioning plan will be prepared at least 2 years prior to end of life for the project. TRC's view is that the decommissioning aspects should be known prior to determination and that these aspects should be the subject of performance bonds to ensure more certainty to the community that environmental restoration will occur with a degree of certainty.

Another aspect to the decommissioning process which remains unknown is whether it includes the removal of the large concrete footings for each turbine. Council is of the view that all components of the wind turbines including associated infrastructure and works (such as footings) should be removed entirely to ensure the land is appropriately environmentally restored.

5. Aviation Safety

The Civil Aviation Safety Authority (CASA) has indicated that this Project will be a hazard and made some recommendations with regards to aviation lighting. Council also has concerns with regards to the height of the turbines and obstacles lighting being required. Council would like to understand whether there has been any consideration into smaller turbine / tip heights that might remove some of these concerns raised by the CASA and also visual impact concerns raised by the local community.

6. Local Economy/ Local Jobs

In a recent presentation to Councillors, the Proponent indicated that they would seek local workers to assist on the Project during the construction and operation stage. TRC would like to understand further how this could be realised by the Proponent, and what assurances can be made to support local employment.

Council is happy to connect the Proponent with local training providers, in order to provide upskilling and training opportunities should this be available during the construction and operation phases of the Project. Should the Project be approved, TRC would like certainty that local businesses will be engaged to help support the local economy.

7. Cost of Power

Council would like to understand whether the cost of power to the local community will be reduced as a result of this Project. Apart from the Community Benefit Fund and Neighbourhood Agreements, what other benefits will there be to the local community from the perspective of reduced power bills.

8. Traffic

Council requests further details in relation to traffic movements for the ancillary works such as internal road construction (gravel trucks and the like), water sources etc. Presently it is unknown where the source of materials for some aspects of the project which could have an impact on TRC local roads.

In respect of the anticipated construction traffic, adequacy and dilapidation surveys of all infrastructure including pavements, culverts and bridges must be conducted. These surveys shall form the basis of any agreements with regards to upgrades, ongoing management, and reinstatement of the infrastructure during construction and prior to final commissioning of the site.

Pavement deterioration and dust nuisance shall be the subject of specific management plans.

9. Stormwater and Erosion Control Management

TRC requests the preparation of appropriate site assessments, management plans with ongoing monitoring, and resultant detailed design briefs.

Conclusion

Whilst Council's current position is neutral on Stage 1 of the Thunderbolt Wind Farm development, it is mindful of the potential negative impacts such an industrial sized development can have on an existing agricultural community and environment and request the Department to be satisfied that the requirements of the SEARs and issues raised in this submission and by others are appropriately responded to and addressed prior to any determination.

Should you require any clarification in relation to the matters raised above, please contact Manager, Development Sam Lobsey on the number below.

Yours faithfully,



Gina Vereker

Director, Liveable Communities

Tamworth Regional Council

Contact: Sam Lobsey (02) 67675507 or s.lobsey@tamworth.nsw.gov.au

27 June 2022