

22nd May 2022

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

Dear Sir/Madam,

Re Thunderbolt Wind Farm SSD-18087896

Friends of Kentucky Action Group has 44 member families from the districts of Kentucky and Balala in the New England region of NSW, and we write to **object** to the Thunderbolt Wind Farm Stage 1.

The proposal will turn beautiful sub-catchments of the Macdonald River in the Kentucky district of northern NSW into an industrial zone, impacting endangered ecosystems and wildlife, land values, local amenity, and the ability to fight fires in a high bushfire risk area.

Reasons for our objections are expanded below, and our submission is supported by several attachments which are listed at the end of this letter.

Landscape, visual and shadow flicker

Negative impacts on rural and rural-lifestyle landscape beauty and amenity

Kentucky is a closely settled 'soldier's settlement' district a short distance to the east of the proposal. The district supports orcharding, farm stays, a distillery and restaurant, and larger grazing enterprises. The village has a shop, a church, a public school, a community hall and many surrounding lifestyle blocks.

The landscape and visual amenity of the district will be forever negatively changed if this development proceeds.

Many residences will be severely impacted by shadow flicker from the very large turbines in the late afternoon. Sunsets will never be possible without turbine interference.

For members of our group to the west of the proposal, shadow flicker will be a significant problem in the morning, and sunrises will never be possible without turbine interference.

Each turbine will have a red light on its hub that will activate and flash at night. That's 70 red flashing lights at approximately 180 m above ground level, impacting our normally very dark night skies for many kilometres. The reflection will be exaggerated in low cloud conditions.

Local amenity will be significantly impacted by the high visibility of these massive turbines. They will be six times higher than, and tower over, the high voltage 330 KV power lines that already traverse the area. The beautiful local landscape that attracted many of the residents will now be dominated by these structures.

Noise and vibration

Local residents will be impacted by noise, vibration and infrasound during both construction and operation of the wind installation. Some residents will be surrounded, therefore affected no matter which direction the wind blows from. Many residents will find this intolerable compared to the quiet tranquility of the landscape they currently enjoy.

Noise is known to travel for many km beyond the boundary of the wind farm in a tunnel like fashion, impacting residences many km away.

In the specific case of large-scale wind farms, audible noise and infrasound impact well beyond property boundaries, affecting neighbouring residences and properties. Of particular concern to us is infrasound, which travels over hundreds of kilometres. It impacts human health and animal health, therefore impacting neighbouring rural production. This will have significant economic consequences for local farming operations.

On 25 March 2022 the Victorian Supreme Court issued a judgment on the Bald Hills Wind Farm nuisance proceedings in *Uren v Bald Hills Wind Farm*, and it was held that operational noise from the Bald Hills Wind Farm was causing a nuisance to local residents at nighttime and ordered the operator of the Bald Hills Wind Farm to stop causing nuisance from wind turbine noise at night and implement noise abatement measures.

At our own cost, we engaged an independent consultant to review the Thunderbolt Wind Farm proposal noise study contained in the EIS. Please refer to that assessment (attached). This consultant was involved in noise assessments associated with the Bald Hills Wind Farm Supreme Court Case.

Aboriginal cultural heritage

In the mid-2000s, the highly respected Southern New England Landcare network worked in partnership with archaeologist Ms. Suzanne Hudson (nee Barnett), local elders and local landholders in the region to explore farms in this district for cultural artefacts and educate community members on their importance. This project was called the 'Anaiwan Lands Education Project', and it won awards for its innovative approach.

In our group's view, the Aboriginal Cultural Heritage Assessment (Appendix 14) has not properly engaged key members of the Anaiwan nation in the site inspections, therefore the results of this study are questionable.

It is unacceptable to members of our community that artefacts found 'in the way' of sections of the development will be 'managed' by the site managers at the time.

Biodiversity

The sub-catchments that will be impacted by this proposal were less affected by New England Dieback during the 1970s to 1990s. As a result, they are more intact in terms of habitat than many other Northern Tablelands districts. They are home to several Critically Endangered Ecosystems under the *Federal Environment Protection and Biodiversity Conservation Act (1999)*.

The area is home to koalas, and the endangered Bells Turtle and various threatened and declining woodland bird species (Huggett, 2019). A short distance downstream, the MacDonald River supports platypus, another iconic Australian species currently being considered for the threatened species list. Indeed, the Neoen Biodiversity Development Assessment Report (BDAR) identifies a significant number of endangered and threatened species.

The turbine installation and road construction will involve clearing many trees and shrubs in high value biodiversity areas.

Members of our group value the wildlife we see and enjoy on a daily basis, and we were horrified to see statements in the EIS such as (p.46, Appendix 12):

Shaking of habitat trees (with heavy machinery) as appropriate to encourage fauna to abandon trees.

It is not acceptable for farmers to treat wildlife or their livestock in this way and legal action would be taken against them if they did. So why is it acceptable for a foreign-owned wind farm developer to treat our wildlife in this way? It's not.

Koala stronghold

Most of the trees in this area are classified as high-value koala habitat species. Koalas feature across this landscape because their habitat remains intact alongside sustainable grazing operations.

The NSW Government has just released its new Koala Strategy (29 April 2022), and the Minister as recently as yesterday, announced that the Uralla and Armidale districts are 'strongholds' for koala populations. He has encouraged landholders to partner with the NSW Biodiversity Conservation Trust to protect them and their habitat. There could be no finer example of contradiction and hypocrisy coming from within two areas of the same Government department!

Our group maintains there is no social licence to conduct koala habitat removal for large scale wind installations in koala habitat strongholds.

Extent of biodiversity impacts

Our group believes that the proponent's BDAR focuses predominately on biodiversity impacts within the development site footprint but fails to adequately assess the impact of wildlife movements between the development site and biodiverse adjoining areas, which are often physically separated by only a farm fence.

There is significant potential for displacement of wildlife home ranges and the sterilisation of suitable habitat because fauna will avoid the turbines, which ultimately disrupt movement patterns. This means that the breeding patterns of some species and indeed their ability to breed at all, will be adversely affected. The proponent's BDAR does not, in our opinion, sufficiently mitigate or offset these impacts.

Land clearing

Members of our group have noticed suspicious land clearing that may or may not have approval on the key property involved in the proposal.

We know that there is an inconsistent approach to the level of assessment and approval required by farmers versus that required by 'state significant' developers. In other words, clearing permits issued for agricultural activities are not subject to the same level of rigor as those issued for large-scale wind installations.

For these reasons, we argue that the proposed development has potentially benefitted from recent 'suspicious' clearing on the site. If this is the case, the impact on habitat for threatened and endangered species in this critically endangered ecological community has already occurred.

If this is indeed the case, we call for those areas already cleared to be subject to mitigation and environmental offsets.

Water and soils

The installation of each turbine involves the construction of massive steel and concrete footings, requiring granite rock blasting to install. Each turbine will require approximately 2,990 tonnes of concrete (1,300 m³ x 2.3 t/m³) plus approximately 900 tonnes of steel reinforcing as ballast. A substantial gravel road network (55 km) will be constructed within the catchment to transport the concrete and the huge metal components of the turbines.

What guarantees is the proponent making to ensure leaching of toxic materials from the concrete footings into the water table of the (clean) upper reaches of the Murray Darling Basin does not occur? This is not addressed in the EIS to the satisfaction of our members.

The road network and associated water drainage will significantly change the sub-catchment surface and sub-surface hydrology, leaving large areas of bare ground, risking increased rainfall runoff, soil erosion, and damage to water quality in tributaries of the beautiful MacDonald River in the upper reaches of the Murray Darling Basin.

Inadequate attention is paid in the EIS to how the proposal will impact ground water flows. There will be unknown impacts on spring-fed dams and creeks on adjoining and nearby properties and the habitats they

support. Many local farms rely on ground water for both domestic and livestock use. Any changes to groundwater as a result of the huge foundations under the towers will be unacceptable.

Traffic and transport

This project will cause massive disruption to a major interstate transport route (New England Highway) that is also the main thoroughfare for our local community to access schools, shops, rural services and medical services. This route is the main freight route for hundreds of trucks every night, and when the Pacific Highway is closed due to fire or flooding, as we have seen in the last few years, the New England Highway is the main alternative route.

The productivity of our district will be impacted negatively by the delays and disruption to traffic flows. The deterioration of all the road surfaces will cause further delays, increases in dust levels, reducing air quality and increasing costs to local government, potentially increasing rates paid by residents. There will be increased costs to residents' vehicle maintenance as a result of pot holes caused by the increased heavy vehicle use.

Blade throw

Giant industrial wind turbines can shed their blades, collapse and/or burst into fireballs.

Around the world, hundreds of wind turbines have exploded, raining molten metal and over 1,000 litres of flaming gear oil and hydraulic fluid and burning plastic earthwards.

There have also been multiple cases when an entire giant industrial wind turbines has collapsed to the ground.

It is estimated the Thunderbolt Energy Hub proposed 270+ m turbines could throw blades 2.4 km or more in any direction from each of the turbines.

Wind turbine fires and the habit of shedding their blades with debris thrown for kilometres is a risk to the lives of residents and an unacceptable bushfire risk in an already bushfire prone area.

Bushfire

The area proposed for the wind farm is rated as being of high fire risk. Fire seasons like Black Summer are forecast to become more frequent. Fires impacting our area most often start in rugged dry sclerophyll forest, to the west of the project area and travel eastwards with prevailing winds through critically endangered box gum woodland on the proposed site, in the direction of Kentucky and Kentucky South.

Our concern is that the proposed project will be in the path of the fire, impacting our community's access to aerial fire-fighting support.

These concerns are supported by Rural Fire Service (RFS) advice that the turbines would be treated like any other potential hazard, and therefore would by necessity be avoided.

Aerial support from fixed wing aircraft and helicopters was critical during our community's experiences in the Black Summer fires, with the helicopters flying over the proposed wind turbine area to fill their buckets at the large dams on 'Bannalasta'.

The recent bushfire inquiry emphasised the need for aerial control with more purchases of aircraft.

Aerial water bombers may not be able to maneuver with the same freedom currently available in this relatively unrestricted air space as the presence of turbines will impact on operational aerial movements. This will potentially lead to irreversible damage to highly significant, already vulnerable, flora and fauna which will become inaccessible because of the turbines. It will also potentially lead to many homes, farms, livestock, and residents being put at risk.

The proponent's research into the ability to adequately conduct aerial fire-fighting in a bushfire prone area, and its proposed solution to develop procedures including 'switching the turbines off during a fire' will not remove the risk and is therefore not an acceptable solution.

Given the climate outlook and the horrendous season we went through in 2019-2020, the proposed windfarm site is unsuitable from a bushfire hazard and firefighting perspective.

Aviation safety

The proposal is near the commercial flight path of the Armidale to Sydney flights, with planes regularly taking slight diversions directly over the site. Lights are likely to be required on the towers by CASA. These lights will impact many residences in our district.

The Westpac Rescue Helicopter operates along this section of the New England Highway on a very regular basis – sometimes weekly. Pilots, crews and patients will be placed at increased risk while operating in an area with many tall wind towers. The proponent's EIS has not adequately addressed how this will be 'mitigated'.

The safety of aerial fire fighters will be put at risk given the project is in a high fire danger area and aerial support will be desirable to protect the New England Highway and Kentucky Village from catastrophic fires approaching from the west.

Telecommunications

Television reception is likely to be impacted for many residents of the Kentucky district, given many obtain their signal from the Narrabri/Mount Kaputar tower.

On reviewing the proponent's correspondence with various telecommunications operators regarding potential impacts, we note that out of the 24 organisations Neoen contacted, they failed to make initial contact with 8, they had no response from a further 14, they received a partial response from 1, and a response indicating a negative impact from 1. This is a very poor result.

Mobile phone reception is very important for Kentucky residents, as the copper wires and the telephone exchange are very old and unreliable. Telstra has refused to fix many 'end of the line' phone services on this exchange, stating it is too expensive to do so.

Neoen is unable to guarantee that mobile phone reception will be unaffected by the operational wind farm. This will cause unacceptable negative impacts on residences, businesses, and farms in our district. We cannot support this proposition.

Waste Management

Neoen's plan for waste management is totally inadequate.

To be 'clean and green' as a renewable energy provider, fully recycling all components should be mandatory, including the concrete footings.

What guarantees is the proponent making to ensure that local government waste facilities will not be called upon to take the massive non-recyclable blades, which are at least 100 m long?

Air quality

Many residences will be significantly impacted by transport and concrete dust during the construction phase. Human and animal health will be impacted, not only placing pressure on already inadequately supported rural health services, but impacting negatively on livestock production in the immediate affected area, and having negative economic consequences.

Economic impact

Pressure on under-resourced local governments

Local government is likely to be negatively impacted by excessive water usage in the massive concrete footings. The 2017-2020 drought demonstrated how critically low potable water supplies became. Many households could no longer shower or wash, and had to travel many km to buy and transport water. Our

communities can't afford to have this much water allocated to construction, when there is so much more water available in other areas of the state.

Excess gravel usage for the construction of roads will also impact local government budgets and their ability to service their own rate payers. Excess road use by heavy vehicles will increase the need for and cost of road repairs. Garbage disposal will be significantly increased. All this is likely to lead to increased council rates over the life of the proposed project.

Jobs furphy

Although there will be an increase in jobs during the construction phase, many of these will be only 'fly in fly out' (FIFO). It is well-known that FIFO workers don't have the economic boost on local communities that employing locals would have. This would significantly change the nature of our local communities of Kentucky, Uralla, Bendemeer and Walcha.

These are jobs that should be offered to local residents, but the proponent has made no guarantees of this. They have already demonstrated their preference for big city service providers in the production of the EIS, when there are local providers with the skills and knowledge who could have prepared the work.

In reality, the operational stage jobs will be very few. Neoen's figures contradict themselves throughout their various brochures indicating it's all a bit 'made up'.

Economic impacts on family farms

As a result of the direct impacts of the construction and operational phases of the installation discussed elsewhere in this document, family farming operations in the vicinity of this project will be impacted financially for many years because of productivity losses. Animal health impacts are likely to include weight loss from stress caused by dust, noise, reduced water quality, flickering light and increased transport time to market (to mention a few).

We know that when large corporates move into an area and buy up the farms, small communities gradually die, along with local pride, and the social fabric that holds a community together, providing that elusive but desirable intangible called 'resilience'.

We can already see this happening to a certain degree in our area. The main proposed site for the project is currently owned by a Chinese company, as are several adjoining farms. In fact, almost all the large properties on the western side of the New England Highway from 'Kyabra' to Bendemeer, are Chinese owned. Our group is of the opinion that this was a very deliberate process, because the 330 KV power lines run through all of them, making them likely sites for (inappropriate) large scale wind installations.

So, in effect, the NSW Government's declaration of the REZ in our region without prior research, planning or consultation has impacted the ability of local farming families to purchase those properties, expand their businesses and implement adequate succession planning for their families, due to competitors with very deep pockets, who may have other motivations in mind.

Is this the right direction our region should be heading, given the current national security, resource security and food security concerns we have as a nation? Our group thinks not.

Once these large-scale installations are built, some of our members will never be able to implement their long-term farm plans of integrating farm stays and regenerative agriculture capacity building events into their business because of noise and shadow flicker making the quiet enjoyment of a beautiful, regenerative, sustainable, and productive environment impossible. This will have a direct negative impact on their long-term viability and financial success.

Negative impacts on land values

Many rural lifestyle farms exist in the Kentucky area as a result of its orcharding history, and as a result of both Uralla Shire Council and Tamworth Regional Council allowing sub-division to rural lifestyle size properties some years ago.

Many buyers seeking attractive rural lifestyle blocks will avoid of areas with wind turbines making sale of the rural lifestyle properties in the district much more difficult, especially for those properties that will be surrounded by both Stage 1 and 2 of the proponent's plans.

Longer term assessments in Victoria of the impacts of wind turbines on the land values of rural lifestyle blocks indicate that such blocks take longer to sell and are harder to sell. There is also evidence they may suffer reductions in value of up to 30 per cent when compared with similar blocks not impacted upon by wind turbines (Access Economics, 2008).

This situation is unacceptable to our community and the proponent has done nothing to ameliorate our fears.

Social impact

Disruption, disharmony and dis-ease

Our community is already being severely disrupted and individuals are facing substantial losses. People are being forced into spending large amounts of time, energy, and money to defend their life's investments and their health. See Table 1 for the cost to community members so far.

Table 1. Value of community time spent - 1 January 2020 to 24 May 2022 (source, FOKAG records, May 2022)

Item	Number	Hours (ave)	Participants (ave)	Cost/person/hr (\$)	Total cost (\$)
FOKAG group meetings held or attended	35	3	8	60	\$50,400.00
Exec committee time (agendas, minutes)	35	3	2	60	\$12,600.00
Exec committee time on group comms & coordination	35	0.5	1	60	\$1,050.00
FOKAG 'public meeting'	1	3	102	60	\$18,360.00
Public meeting prep	1	12	2	120	\$2,880.00
FOKAG submission on EIS prep	1	60	1	120	\$7,200.00
Group members submission prep (44 families)	44	6	2	60	\$31,680.00
Sub-total:					\$124,170.00
Time spent volunteering is time spent away from the family farm, which has to be paid for (valued at the same rate):					\$124,170.00
Cost of printing 1 group copy of 2000 page EIS (Neoen refused to print copies for non-computer using community members)					\$285.00
Cost to group members for Independent Noise Report:					\$3,850.00
COST OF COMMUNITY MEMBER TIME SO FAR:					\$252,425.00

This 'shifting' of responsibility onto the community rather than the proponent to ensure social license and prove that the development meets sustainability requirements, is unfair on any community, let alone a community still in recovery from drought, fires, floods, pandemics and plagues. It is not acceptable.

We are just ordinary people who have been forced to fight to protect to our homes, livelihoods, and local environment from being transformed from a peaceful rural residential area into a large-scale industrial zone.

Neighbours are being pitted against each other and the social fabric of our small, interdependent community is being torn apart.

There is concern and anxiety within the community. Many community members will eventually suffer mental and physical health impacts because of the various impacts of these towers.

It is now routinely reported both overseas and within Australia that those unfortunate enough to live near large scale wind installations suffer many and varied negative health impacts both mental and physical.

Noise, dust, traffic congestion and once operational, shadow flicker will likely drive residents away from the area, and cause visitors to rethink their plans to visit. This will further isolate this small regional district and reduce resilience across our region.

An unfair, broken process

Fairness is missing in this process and the community feels it is being discriminated against.

In a country renowned for its culture of giving everyone a 'fair go', the Kentucky community feels there is nothing fair in this process. We feel let down and betrayed by the NSW Government, because at no stage has meaningful community engagement occurred.

- The community was not consulted prior to declaration of the New England Renewable Energy Zone which in effect concentrates a huge number of renewable energy projects into our small rural communities.
- The developer, backed by its multimillion dollar resources, is allowed months/years to develop their EIS. The Department with its considerable resources will take weeks/months to review that EIS. Communities, with a band of dedicated volunteers and no resources, are allowed 28 days to respond to the 2000+ page EIS document.
- The community applied for an extension to the EIS Exhibition period to allow us more time to respond in a comprehensive way to this huge document, but this request was refused.

Compensation incompetence

Compensation offered to the community is also a source of concern. Whilst there is no compensation in the terms of a Community Future Fund that is acceptable for the many negative effects suffered by neighbours of the wind project, it is interesting to note that Councils from affected areas now claim they, not the community, should be paid and administer the Community Future Fund.

The Mayor of Armidale has publicly said that paying compensation to communities is

...just throwing loaves to the masses to keep them happy. It's not genuine region building.

How can any of this be considered fair?

Combine the above with the fact the developer has consistently refused the community's requests to discuss this development at a public meeting, and it seems there is an intent to silence this community's voice.

Our group's volunteers have spent significant hours, days and weeks trying to raise awareness in the community (Table 1) and hold the proponent to account at great expense to their own personal lives and businesses. The \$250,000+ already expended by the community (Table 1) makes the meagre \$100,000 the proponent is offering by way of a community fund look like peanuts, and our group members find it insulting if this is the 'compensation' those affected and impacted are being offered.

Failed community engagement by proponent, Neoen

In the three years leading up to the exhibition period of the Environmental Impact Statement, Neoen has conducted extremely poor community engagement, a legislated requirement. The whole attempt has been conducted under the influence of Covid-19 restrictions, making community gatherings, even in small groups, very difficult. This has disadvantaged the community and advantaged the proponent.

Few in the Kentucky and Balala communities who will be impacted by this large industrial scale wind installation, know much about the proposal, if anything at all.

Drop-in sessions

The proponent conducted one drop-in session in a cafe in Uralla, 20-50 km away from impacted landholders, during covid restrictions on a weekday afternoon. This resulted in a very small sample of participants attending. After this, our group requested a public meeting on a Saturday afternoon at the Kentucky Hall to enable more participation.

The public meeting was refused, and in its place Neoen conducted another drop-in session at Kentucky Hall. Technical staff were to be 'available' online to answer our questions. However, we knew Kentucky Hall has no internet access (even via the mobile network) and we knew this promise would be broken.

Despite further requests, Neoen refused to conduct a public meeting.

Community Consultative Committee

Our group's attempts to discuss the project with the Community Consultative Committee (CCC) were met with 'we are not required to do that' from the committee Chairman Mr Wej Paradise.

During May 2022, one CCC member attended a drop-in session that our group hosted and confessed to know very little about the proposal at all.

Only two sets of CCC meeting minutes can be found on the Thunderbolt Wind Farm website, indicating that either the committee has failed to upload all meeting minutes (a legal requirement), or, they have failed to meet more than twice since their inception. Either of these scenarios is unacceptable.

Treatment of neighbours

Neoen has refused on numerous occasions to meet with more than one community member at a time. They refused to meet with small groups of even two neighbours at once. And they have never offered for neighbours and hosts to meet in a facilitated process.

Indeed, Neoen neglected to contact numerous direct neighbours of the project at all. Neoen still has not answered direct letters written by concerned residents requesting discussions, more than 12 months after they were written.

Neighbours of the project were suddenly, with no prior consultation, offered totally inadequate Neighbour Agreements that had a tight signing deadline. There were no discussions regarding Neighbour Agreement design prior to neighbours receiving the glossy brochure in their mailbox outlining the offer. There were no facilitated discussions between hosts and neighbours to negotiate the position of turbines or the concerns that a neighbour might have about certain aspects of the project. Most neighbours of this project are members of our group. This approach is unacceptable.

Further, one of our group members – a direct neighbour of the proposal – is not even indicated on the project maps in the EIS. Does this mean he has not been considered in the community consultation, or the neighbour agreement options? The answer is yes.

Public misinformation

Neoen representatives were dishonest in an ABC radio interview about how many community meetings they conducted.

In summary, Neoen has:

1. Failed to provide an adequate community engagement plan.
2. Employed a community engagement officer who has a major conflict of interest - her extended family members wish to become wind tower hosts.
3. Failed to conduct meetings with impacted direct neighbours, despite being requested to do so by those neighbours.
4. Conducted 'drop in' sessions at inappropriate venues (more than 40 km from some impacted community members) and at inappropriate times (during covid restrictions)
5. Refused to conduct a public meeting in the lead up to their EIS submission to raise awareness and knowledge of the project, despite being requested to do so by the community. In refusing this, they have failed to enable the community to ask questions in a forum setting so that community members benefit from the questions asked by others.

6. Conducted a zoom meeting online as part of their 'community consultation' with very short notice, and very poor attendance from community members due to the lack of internet access and computer use in our community. At this meeting, they provided inadequate answers to questions and then muted our two group representatives so they could not speak.
7. Failed to upload all minutes of the Community Consultative Committee meetings to their website.
8. Blocked their Community Consultative Committee from consulting with the community. Our local community group was refused a meeting with members of the CCC. Their written response stated that it wasn't part of their role to speak with our group.
9. Failed to have an office location in the local community.
10. Deliberately confused the community by breaking the project into Stage 1 and Stage 2 part way through the process.

A few years ago, the Arding community near Armidale expelled Neoen from their district for similar bad behaviours. We demand that Neoen be expelled from our district for their bad behaviours, which in our experience have been totally discriminatory.

Cumulative impacts

The EIS for this proposal does not address cumulative impacts adequately. Indeed, the EIS does not even acknowledge the full list of projects currently being 'investigated' by large scale wind installation proponents in our area. This is unacceptable as it provides a misguided view of the real story to those reading the report.

The cumulative impacts of the 590+ towers proposed within a 70 km radius of Walcha will negatively impact many families, businesses, communities, and environments in our region. Our beautiful New England region will be transformed into an industrial landscape.

This is unacceptable to our community because there is a better way to transform our energy system to renewables that does not impact in this way – through small to medium scale embedded microgrids, which are being promoted by University of NSW and the Australian Renewable Energy Agency as the most efficient and effective methods.

Site suitability

In addressing the overall suitability of the site, our group has considered whether the proposed development has satisfactorily achieved the Objects of the *NSW Environmental Planning and Assessment Act 1979*.

The following Objects are considered particularly relevant to the proposed Thunderbolt Wind Farm Stage 1:

1.3 Objects of Act

The objects of this Act are as follows —

- (a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,
- (b) to facilitate ecologically sustainable development by integrating relevant economic, environmental, and social considerations in decision-making about environmental planning and assessment,
- (c) to promote the orderly and economic use and development of land,
- (d) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities, and their habitats,
- (e) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),

Our group is not satisfied that the proposal is consistent with the above Objects of the Act.

There are better ways

The NSW Government has skipped several steps in the planning and implementation of our state's transition to renewable energy.

Land Use Planning - The Renewable Energy Zones (REZ) in NSW were announced before any large-scale land use planning was conducted, in which all factors were considered, and all communities and agencies involved. This land use planning remains absent, and we request it is carried out before any further developments are allowed to proceed.

Community Engagement - The REZ's were implemented with no community engagement. Communities are smart. They have great ideas. They need to be involved in sound processes to enable ownership. This sense of ownership is what provides 'social licence' for a project. We ask that the NSW Government shows rural communities the respect they deserve.

Thinking outside the box - The energy transition is a wicked problem that we need to solve. But why do we assume that mega projects involving mega scale wind turbines and solar panels planted inappropriately across our landscape are the only two approaches?

What about diverting the significant subsidies our governments provide to foreign companies to build coal mines and wind installations, and using them instead to subsidise households and business to install grid connected solar and battery systems on existing infrastructure? This would have significantly fewer negative impacts such as those discussed above.

Everyone could be involved. Every existing structure that can hold up a set of panels could do so, and the government could help everyone achieve this, including every building in the big cities. No region would be 'singled out' and discriminated against. Everyone benefits, particularly the local installation businesses, supporting economic growth and development in the regions. Best of all, we keep the profits in Australia.

Conclusion

Wind turbines are now old technology. Many areas of Europe are now rethinking turbines because of their more mature renewable energy industries and experience.

We strongly urge the NSW Government to look to overseas experience before allowing these types of developments to proceed in our relatively clean and green and very biodiverse region. We will never get it back once it's ruined.

We appeal the NSW Government to take a big picture view and have the sense and foresight to dismiss the Thunderbolt Wind Farm Stage 1 proposal, along with others, and demand a better approach that involves sound research, community engagement and has significantly more social license to operate.

Yours sincerely,

Friends of Kentucky Action Group

44 member families in the Kentucky and Balala districts of the Northern Tablelands

Attachments

1. Independent Assessment of the Thunderbolt Wind Farm Stage 1 EIS Noise Report by Les Huson, May 2022
2. FOKAG Presentation to LGAs May 2022.pdf
3. Petition components including:
 - a. 262 signatures at <https://www.change.org/p/local-regenerative-agricultural-communities-not-global-industrial-energy-factories>.
 - b. 102 signatures on a paper version, filename FOKAGChangeOrgPetitionSignatures.pdf