

Cover letter to **Objection** submission

Project Details

Application Number

SSD-6696-Mod-1

Main Project

SSD-6696

Assessment Type

SSD Modifications

Development Type

Electricity Generation - Wind

Local Government Areas

Mid-Western Regional, Upper Hunter Shire, Warrumbungle Shire

Exhibition Start-End Date

20/09/2022 - 17/10/2022

Objection to MOD - : Liverpool Range Wind Farm

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Issues

1. Amenity

1:1 Coolah region scenic value loss

- 1.1.1 No recognised value of the visual scenic value for our region
- 1.1.2 Increased Loss of Visual scenic value with increased turbine height
- 1.1.3 Community has had No opportunity to declare 'No Go Zones'.
- 1.1.4 Loss of attracting the target travellers who seek to experience 80% natural environment, isolation and connect to nature.
- 1.1.5 No Go. Area should be the scenic route towards the Coolah Tops National Park.
- 1.1.6 Removed proposed turbines Turbine Zone A and B (especially Turbines close to road views B1, B2, B3 and B4 and those impacting the vista from the Coolah Tops National Park.
- 1.1.7 Ugly giant Steel Electricity Towers needed across our hilltops and farms to carry the power to the coast.

1:2 Residents impacts

- 1.2.1 As an associated land holder does not mean or diminish the impacts on quality of life and loss of amenity to the resident. The fees paid for the land use should be separate to a compensation and mitigation strategies applied as an impacted resident with in a 2 Km radius for losses habitat, visual amenity and noise.
- 1.2.2 Homes within in two kilometre radius of the government prescribed safe zones was recommended at the old height and size of turbine 150m not 250m this should be revised to take into consideration the bigger turbine.
- 1.2.3 Photo montages used a misleading and deceptive. Most have clouds in background and a disproportion of foreground grass shown. These montage of proposed wind turbines is in the TILT Liverpool Range

Modification Documents Composition ploys are used that trick the eye so you start to think they're not that big. But even these ploys can't hide the fact that these monster wind turbines will clutter our skyline, ruin our enjoyment of the landscape and likely devalue our property. As an exercise, some members community measured the height of the tallest point nearby to the viewing spot on Vinegaroy Road "Coolah Valley Lookout". It is about 800m above sea level. The Coolaburragundy River on the valley floor is about 500m above sea level. That makes the hill about 300m high from the valley floor. The wind turbines at 250m are going to be ALMOST AS HIGH AS THE HILL again! If you look at that hill from Coolah and imagine it doubled, that's close to how high these proposed turbines are going to be ! This is not portrayed at all.

2. Homes within in two kilometre radius should be relocated or turbines moved outside this safe zone.

2.2.1

2.2.2

1.3 Shadow flicker from turbines

G2 shadow flicker 3:1 and 3:3 table 3:2. Appear to only allow for summer sun and not the low lying winter sun conditions.

2. Bio diversity

2.1. Error and MOD submission

2.1.1 ITEM 7 MOD Biodiversity Credit Report see Appendix 1 - there is no appendix how can we evaluate this when no report on exhibition.

2.1.2 in a report include in the MOD state a assessment date 2035.

2.2. Habitat loss

2.2.1 Regent honey eater a threatened species has it habitat threatened with increased lands removed as a part of this MOD at the same time a notice from the Government department of Primary Industry and Environment to encourage farmers to conserve the habitat and put a Restriction around zone of agriculture land use.

2.3 Native Species categorised errors

2.3.1 Table 5:8 risk assessment summary. Why the low flying swift parrot risk rating 'high' risk when the wedge tail edge which is high flying species not consider high risk?

2.3.2 Why is the pardalote (peep wren). Not noted on the list of species when it been known to populate the area and is endangered. Photo evidence available.

3. Noise impacts

3:1 Sound assessment

3.1.1 Sound assessment requires a peer review. Eg:- the peer review of the noise assessment for The Valley of the Winds Farm Coolah was underestimated impacts 5 – 10 decibels lower in favour of the proponent.

3.1.2 Unique topography of a valley will impact noise assessment.

3.1.3 Sound base level for rural Coolah is not like urban with background noise of traffic etc. Coolah has a near zero decibel base sound so the impact of 35 – 45 decibels increase is significant and has not been adequately considered or factored into the negative impact on community amenity both associated land holders and associated land holders. A simple demonstration of a microwave switched on and operating sends a constant sound out at hum of approx. 30 decibels. The noise factor similar to a generator by the amount we are getting will that impact sleep as these things run 24/7.

3.1.4 Unknown Noise impact of these sized 250 meter high turbines.

3.1.5 Noise direction chart has not been included or considered.

4. Financial impacts

4.1 Negative financial benefit to the community and local government.

Originally over ten years ago the community was promised millions of community financial contributions, when in reality, less \$200k pa/per local Government area.

Reduced financial benefit to the community and local government from the formula used to return benefit based upon the number of turbines with increased impacts and less funds. Original project engaged the community with inflated project of over 350 turbines and a price per turbine equating to \$3k x 350 turbines equated to over \$1m dollars. The revised calculation if all 220 turbines used \$1.2m for the construction period and then reverts to \$800k (if all turbines constructed) There the community is not aware that there will be little less than this when constructed and this divided by the local governments involved less there allocation towards road maintenance etc is very little per community per annum and not the perceived \$millions for the community. Eg these funds won't go far in 2016 it cost \$280k / to Form 1 km road in Coolah.

4.2. Increase funds to community impacted

4.2.1. Opportunity to the government incentive for renewables to forwarded on to the community, rather than funds going into the hands of private companies.

4.2.2 For the 'Voluntary planning agreement should be renegotiated to be based upon the megawatts of energy produced not per turbine.

4.3 False claim to say a 'Less negative' impacts in our rural region loss of flora, sauna, amenity, disruption and fluctuations of housing, jobs, changes to our rural regional

culture, the cumulative impacts by our local community and disproportionate burden for rural areas to that of high density urban and industrial areas benefiting from the renewable power use.

The project in and around Coolah will be the biggest yet in the whole of Australia and could be the last put on land as new submissions technology is putting the Wind Turbines out at Sea.

5. Road widening for OSOM

5.1 there appears to have non connected routes for OSOM (Gundare Road Coolah) which indicates that there would have to considerable development through private property possible (Mount Mill) to cross our Coolaburrgundy River to access this area.

6. Community concerns

6.1 Public meeting

Nearly 200 concerned citizen attend a meeting in Coolah regarding this MOD to the Liverpool Range wind farm.

Local Government says “it is out of their hands and in the hands of the State Government”. We a rural citizen have only this process of an Objection submission to impact this project and lessen the negative effects on our culture, our community, our environment and our people.

6.2. One wind project does not open the gateway for more renewable projects nor does it give way to place transmission lines through out our beautiful region.

6.2.2 Community impacts from Energy Co transmission line study corridor and the Central West Orana Renewable Energy Zone (CWO REZ). Are State Significant Agricultural Lands not considered in the planning for Energy production/power connection? There a value proposition here: Rural community with productive agriculture / environments **versus** energy production / power connection?

6.3 Noted dangerous health, environmental and social issues for community concerns from meeting. Loss of human wellbeing.

- raised the height of the turbines from 165m to 250m.
- re-sited some turbines outside the previously approved development corridor
- increased the footprint of the development
- increased the impact on native vegetation by 1249ha
- increased the clearing around each turbine with bigger hardstand etc,
- increased the amount of land clearing for roads, cabling and transmission lines/towers,
- increased the number of concrete batching plants
- ignored the impact on the nearby Coolah Tops National Park's visual amenity (eg. they say visitors screened by the trees, position of lookouts face away from turbines).

- increased the amount of native flora to be removed, including 427ha of the critically endangered ecological community box gum woodland and habitat of the at-risk Regent Honeyeater.
- vegetation removal includes habitat for seven NSW listed species (two plant, one mammal, one bird).
- at high risk from the development are the barking owl, large bent-winged bat, powerful owl, swift parrot, white throated needle-tail (as well as Regent Honeyeater mentioned above)
- at medium risk from the development are the black-chinned honeyeater, Corben's long-eared bat, Dusky woodswallow, Painted honeyeater, Superb Parrot, Wedge-tailed eagle, Little eagle, Eastern Cave Bat, Yellow Bellied Shearwater bat, Large-eared pied bat.
- ignored the impact to light aviation activities (concentrating on standard commercial flight paths), and aerial fire fighting (which was used in the area in 2017's Sir Ivan Fire and the concerns raised by National Parks about visibility in fire situations and aerial fire fighting at night).
- don't want turbine lighting because it will be a nuisance to neighbours and may affect the Dark Sky Park, but is potentially deadly to aviators.
- increased visual impact with the higher turbines, impacting more non-associated residences (non-associated = those who haven't signed with the developer either as hosts or under neighbour agreements)
- increased non-associated dwellings experiencing shadow flicker
- increased traffic of around 300+ vehicle movements per day (one way), so 600+ on local roads over the approx. 3 year construction period.
- increase in operational noise levels as several non-associated residences
- ignored the cumulative effect that may occur with the combined wind farms of 370 turbines 250m tall placed on ridges all around the township of Coolah (5-6km from both projects) on wildlife, visual amenity, noise, EMI and property values which will also impact the villages of Uarabry, Leadville and the town of Cassilis (they refer any cumulative effect to be dealt with only by the as yet unapproved Valley of the Winds project).
- increase the micro-siting (developer allowed to move the turbines without oversight/approval) from 100m to 250m.

7. Fire risk increased

7.1 The proposed 250 metre turbines on top of hilltops will affect and impact severely on any chance of fighting fires from the sky with water bombing.

8. Carbon foot print

8.1 The Un-accounted carbon foot print of this project Liverpool Range Wind. Genuine concern for the environment would consider the carbon foot print

8.2. Enormous Water usage

8.3 Massive oil used for maintenance 300 litres approx.

8.4 Power loss

8.4.1 What is real loss of power over the distance for 80 km to be transported before being usable power.

At a recent community meeting the following issues were raised regarding the transmission line study corridor and the Renewable Energy Zone:

1. Lack of community understanding of the REZ and transmission line corridors due to the complexity around the myriad of organisations and government departments involved and their roles: Re-Alliance, Orange Compass, Lumea, Transgrid, EnergyCo, Tactix Group, Valley of the Winds (UPC Renewables), Central-West Orana Renewable Energy Zone, Department Planning and Environment, Department Agriculture, Liverpool Range Wind Farm (Tilt), Commissioner for Agriculture (Daryl Quinlivan) and Community Consultation Committees. Who are they? what role do they play? and how would the average community, business or individual and or regional Local Government navigate or communicate?
2. Community perceives a lack of wholistic planning, local communication, and consultation.
3. Developers planning wind turbines adjacent to cropping country thus disabling aerial agricultural applications with 250 metre high towers located within the 1 km airspace required for fully laden agricultural aircraft.
4. Increased bush fire risk, reduced capacity for aerial firefighting.
5. Developers dismissing community and neighbouring property concerns regarding wind turbine effects on visual pollution for neighbouring homes and workplaces, destruction of birds and bats in turbines, aerodynamic sound, infrasound and its impact.
6. Lack of contact to the existing community organisation such as Chamber of Commerce and CDDG (Coolah District Development Group (27 years old). These groups have initiated the communication.
7. Lack of **'easy access'** communication regarding the myriad of developments. Most community members would not know how to access the project information through planning portals.
8. There is significant opposition to the declared study zone for Energy Co for the connection of two proposed wind farm projects in Coolah Uarbry Energy Hub connection. Request the study area be revised through consultation.
9. Jobs short term v agriculture land loss by installing transmission corridors through high value cropping land.
10. Voluntary Planning agreements (VPA) negotiated by local government without adequate local community input.

11. Current VPA Liverpool Range Wind Farm and Warrumbungle Shire Council now has reduced benefits. Due to the technology improvements ie: Less turbines, less funds though greater negative impacts bigger construction.
12. Will the positives outweigh the negative impacts? Though there are anticipated benefits for the communities within the REZ, such as proposed jobs for locals and community funds etc from specific projects; it is known that after the construction phase there is little employment left for the impacted region.
13. The voice for renewable energy should not be heard over the top of the voice of the agricultural regions and that the high-cost impacts over long term benefit for the regions and the country.
14. The proposed transmission line of high voltage overhead power lines will cause numerous impediments to the highly resourced farming enterprise and disable significant bush fire management resources.
15. Consultation occurs 50km or more away from those impacted. We must pay travel cost /time to attend. Many questions are raised as to why the lack of consultation does not occur locally and that the so-called community consultation meetings are not **consultation** in any form; they are a form of compliance. *They come, they show, they go.* Then, community members must work in a voluntary way to present our case to be heard.
16. When will a team of resources and funds be made available for us as a community to deal with this onslaught of development ? Start with Community Consultation Committees, it is reasonable that the two community representatives on these committees receive no sitting fee, yet everyone else on the committee is remunerated through their employment or capacity?
17. Is it unreasonable to have the regional communities hosting the renewable energy zones be powered by renewable energy? Local battery hubs.
18. How and when will we as citizens be valued for our contribution of the lands in which we live?

Required outcomes

Clearly promote:

- How these developers consulted with the communities?
- How they ensure fair community representation has been reached on CCC (community consultation Committees)?
- How they disclose publicly what were the community concerns?
- How did the organisation address these concerns?

Provide a permanent place of consultation in Coolah with reasonable available access.

Conduct a whole REZ impact study: include community, cultural, agricultural impacts.

Demonstrate how the new study area for the transmission line is proved the best location.

Don't link the two proposed wind farms 'Valley of the Winds' (proposed UPC) and 'Liverpool Range Wind Farm' (approved), a vast land mass has been ear marked as a transmission line.

Solution

Face to Face easy access public contact, for example shop front in communities such as Coolah.

Would it be unreasonable for our community to be directly consulted / communicated to?

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