

I am opposed to the Liverpool Range (LR) wind farm 'Modification'. I have many concerns listed below.

Biodiversity

The Tilt project now quantifies 427 ha of NSW Box-Gum Woodland is to be destroyed during development. This habitat is classified as a Critically Endangered Ecological Community (CEEC). This represents a 2.1 times increase on the approved project, as stated on page 12 of the Biodiversity Development Assessment Report (BDAR):

*Impacts to the NSW Box Gum Woodland CEEC are approximately **2.1 x greater (226.15 ha) than the impact threshold of 200.85 ha** for this TEC as specified in Condition 18(a) of the Development Consent SSD 6696.*

Clearly, an increase of 2.1 times is far beyond a modification. On this basis alone the proposal must now be considered a new project so that the full implications of such reckless land clearing can be properly reassessed.

The quantum of destruction of this CEEC is far too substantial to be acceptable at any level. It is important to note the Biodiversity, Conservation and Science Directorate (BCS) of the Department of Planning and Environment (DPE) recent response to the nearby Valley of the Winds (VOW) BDAR states that the developers planned removal of 428 ha of this CEEC is unacceptable:

*The currently presented development footprint proposes to clear a cumulative 428.52 hectares of the Critically Endangered Ecological Community (CEEC) Box Gum Woodland. BCS considers that this loss would be consistent with both Principles 1 and 2 of Serious and Irreversible Impacts (SAII) and as such **would contribute significantly to the risk of Box Gum Woodland becoming extinct in NSW. BCS could not support an impact of this quantum** and recommend the proponent revise the currently presented development footprint and avoidance and minimisation strategies to further reduce impacts of the proposed development' (pg.1).*

If the removal of 428 ha of NSW Box-Gum Woodland in the VOW project is far too substantial for the BCS to accept, then on any logical basis the planned destruction of 427ha in the LR project must also be unacceptable. Eco-credits are meaningless in this situation given that this CEEC cannot be replaced anywhere else. The responsible approach is to prevent the removal of any of this CEEC. Even degraded Box-gum woodland will recover well if nurtured and allowed to respond. However, this not possible when removed and destroyed forever. It is also important to note that the consequential transmission infrastructure planned by EnergyCo to move the power through the CWO REZ will involve land clearing that will remove substantially more of the NSW Box-Gum Woodland CEEC.

The central problem with the LR project regarding its environmental impacts, such as the destruction of NSW Box-Gum Woodland CEEC, relates to its vast scale. Much of its planned 50,000+ ha footprint covers the uncommon basalt soil environment that is essential for the NSW Box-Gum Woodland CEEC. Figure 1 shows one consequential issue arising from the extensive overlap of the modified LR project with the Regent Honeyeater Priority Area 2. Presumably there is a lack of communication between various government departments, otherwise the overlap area would have already been removed from the proposed development footprint. Tilt also quantifies some of their planned environmental destruction:

In addition, the Modified Project is anticipated to have the following impacts to relevant Matters of National Environmental Significance (MNES) listed under the EPBC Act: - 577.8 ha of potentially suitable habitat for the regent honeyeater (threatened species) - 471.7 ha of potentially suitable habitat for the swift parrot (threatened species) - 284.5 ha of potentially suitable habitat for the

large-eared pied bat (threatened species), and - 672.3 ha of potentially suitable habitat for the koala (threatened species) (EIS pg15):

In addition to the extensive destruction of the NSW Box-Gum Woodland CEEC, such a vast area of wind turbines will create a highly hostile environment for all birdlife across the 50,000 ha footprint. This development will put extensive pressure on fauna such as predatory birds, bats and other threatened species.

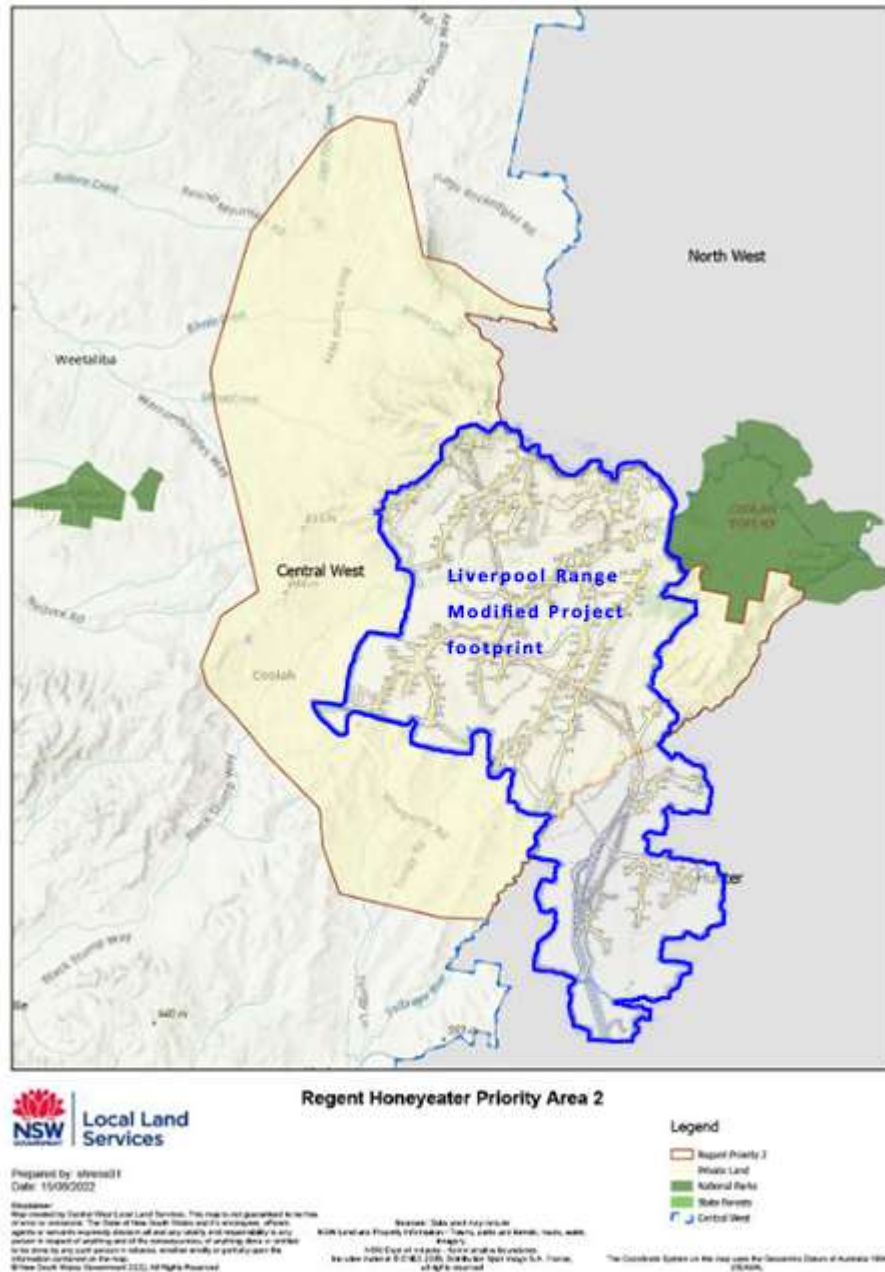


Figure 1 – Overlap of the LR Modification Project with the Regent Honeyeater Priority Area 2

An environmentally responsible approach is to build onshore wind farms that are *not* situated across such CEEC's. From a biodiversity perspective, the LR project should, at the very least, be vastly scaled back to a more moderate size. If these crucial areas of NSW Box-Gum Woodland CEEC are properly valued and SAI to be avoided, the LR project should not proceed, and resources instead allocated to less environmentally sensitive areas. Given the low efficiency of approximately 30% for the LR windfarm, resources would be better focused on offshore wind where efficiency is over 60%.

New Project, Not Modification

The LR project should now be reconsidered as a new project.

The increase in turbine height of 52%, is well beyond the scope of a modification. At this point there are no built onshore wind farm developments with 250m high wind turbines. As such there is no accurate data available to assess the real-world effects of such giant structures on the environment and the community.

A moderate sized wind farm of 30 – 50 turbines at 250m in height could serve as a test case and be used to properly assess all impacts including visual, noise, flora and fauna, broader environmental issues, and community concerns. Proposing a project of such vast scale without reliable data to make accurate predictions could lead to far more adverse outcomes than could be planned for.

The developer has declared in the EIS that:

‘...there are no approved, under-construction or operational wind farms in proximity to the Project. As such, there is no requirement to undertake a cumulative impact assessment as part of this Modification Application’ (pg. 116).

The Department of Planning and Environment (DPE) can decide whether this is a valid assumption. Given there are two giant windfarms planned for the Coolah district, any reasonable approach must surely assess all potential impacts arising from both proposed developments, and the impacts arising from the interaction of the two projects. The rhetoric of the developer, as listed above, shows a blatant disregard for the Coolah community and our local environment. Such statements make it clear the developer has profit as its primary concern and has little concern for the wellbeing of residents in our district.

It should also be pointed out that the vast scale of the LR proposal with 220 turbines is equivalent to three moderate sized projects. The Tilt Modification should be made to consider cumulative impacts on the district of its own project, as well as the VOW project and associated transmission infrastructure.

The importance of assessing cumulative impacts of these projects has been highlighted by Muswellbrook Shire Council’s submission to DPE, dated 14/10/22, responding at that time to the VOW project EIS. They list extensive reasons that show the cumulative impacts on their shire roads from multiple wind farm projects are likely to be immense. The impact on their roads is directly related to the actual traffic when it occurs, not the stage in the planning process of each development as they currently stand – the excuse the LR developer claims for disregarding cumulative impacts.

Muswellbrook Shire Council makes the following statement:

There has been no cumulative assessment on the planned and foreseeable future projects in the CWO REZ that employs an explicit methodology to model plausible future scenarios, understand the pathways of interaction of cumulative impacts and determines and describes thresholds and limits for traffic impacts. (pg.4)

This raises a crucial point: that proposed projects around Coolah including the LR Modification, VOW wind farm and EnergyCo’s Transmission infrastructure are being considered in ‘silos’. A cumulative impact assessment must be undertaken for the Coolah district that appropriately assesses the cumulative impacts of all these developments together. The core problem for the Coolah district could therefore be described as follows:

There has been no cumulative assessment on the planned and foreseeable future projects in the CWO REZ – Coolah District – that employs an explicit methodology to model plausible future scenarios, understand the pathways of interaction of cumulative impacts and determines and describes thresholds and limits for the environment and community of the Coolah district.

Additional reasons for the LR Modification to be reassessed as a new project include the following substantial changes:

- 75% increase in substations
- 125% increase in permanent met masts
- 125% increase in batching plants
- 213% increase in hardstand area
- 105% increase in sand, cement and aggregate
- 100% increase in water usage
- 418% increase in non-associated dwellings visually impacted

Other Substantial Negative Impacts

Other substantial impacts that make the LR project objectionable include:

- The ability to effectively fight fires using aerial fire tankers (eg. C-130 Hercules) will be greatly curtailed
- The adverse effects on water users downstream due to the huge increase in water usage during construction and operation has not been assessed
- The growing community unrest as residents learn more about this project is gathering momentum and reveals the LR project will lead to the fracturing of social cohesion
- The views from our historic Homestead will be spoilt by the closest turbines; E1-E9, and based on Figure 12, in total the natural landscapes to the north will be ruined by 140 to 180 turbines
- The effects of mental health on the community who will be forced to suffer this industrial nightmare are likely to be immense and ongoing
- The 'money first' attitude of the developer and many land hosts shows their disregard and lack of empathy towards the local environment and community as a whole