Submission regarding Winterbourne Wind Farm SSD-10471

My name is Val Delaney. I have worked in the medical, and mental health areas and I am a retired social worker and counsellor. I am a resident of Walcha and will be only 6.5km from the nearest wind turbine. Thank you for the opportunity to make this submission. I have not had much time to make this submission, but have done some research and have some personal experience.

My key concerns are as follows:

1. Table 6-16 Sound Power Levels: Normal operating mode

The sounds (noise, vibration, blade flicker - both heard and unheard by the human ear) that are emitted from the wind towers. EIS covers a wide range of frequencies. The Commissioner has received noise complaints according to the EIS.

I have witnessed this unpleasant effect myself in Victoria where the wind towers are much smaller than the proposed towers for Walcha – which are a bit over 36% taller than anything else in Australia, with turbines that differ from anything tested here.

Noise from wind towers was acknowledged by the Supreme Court in Victoria by Judge Richard J. in Uren v Bald Hills Wind Farm (2022) VSC 145. The Bald Hills WF had 52 towers and they were smaller than the 119 towers that Winterbourne wants to have close to Walcha. The plaintiff was unable to sleep and also noted that the noise was worse in cooler conditions. Walcha is cooler than surrounding areas throughout the year.

This is of great concern, given that studies suggest that in the daytime the noise generated from the smaller wind towers may travel 20km under various conditions. How much further will the noise travel with these higher wind towers that have been proposed?

Willshire, W., and Zorumski, W. (1987). “Low-frequency acoustics propagation in in high winds,” in Proceedings Noise-Con, Vol 87, pp. 275-280.

Furthermore, effects have been noted under night-time conditions to travel 90km from the source.
Marcillo, O., Arrowsmith, S., Blom, P., and Jones, K. (2015). "On infrasound generated by wind farms and it propagation in low-altitude topospheric waveguides," J. Geophys. Res. Atmos. 120 (19), 9855-9868, https://doi.org/10.1002/2014D022821.

It is known that the emissions from the towers negatively affect humans, especially dizziness, insomnia and more, which causes a decline in both mental and physical wellness. My concern is that the emissions from the wind towers will have a detrimental effect on the population of Walcha and those families close to the towers.
Https:www.ncbi.nlm.nih.gov/pmc/articles/PMC3653647/
Please note: Many other studies claiming that there are no negative health effects are done by parties who would gain financially by negating the witness of those who have been impacted negatively by the wind towers.

Please note that I am also concerned about dust inhalation during construction of the towers. I know a number of people in, and around, Walcha who suffer with asthma and allergies, and some with COPD. These people's health will be negatively impacted during the construction process and there could be fatalities.

It is also common knowledge that wind farms/towers are detrimental to birds, bats and wildlife. "Wind farms/towers adversely affect wild animals both directly, via collisions, as well as indirectly due to noise pollution, habitat loss, and reduced survival or reproduction. Among the most impacted wildlife are birds and bats, which by eating destructive insects provide billions of dollars of economic benefits to the country's agricultural centre each year." Quoted from "Can Wind Turbines Harm Wildlife."
https:www.usgs.gov/science/energyandwildlife

This is of great concern given the immediate proximity of the wind towers to the UNESCO Gondwana Rainforests and the Wilderness associated with Oxley Wild Rivers National Park. It shows that the biodiversity risk assessment is faulty. For example:

Wedge-tail Eagles and Raptors are particularly prone to wind tower strikes as they soar from the gorges into the wind farm area. There is a high concentration of Eagles that live on the edge of the gorge, where a large number of towers are located. These birds are particularly prone to bird strike with the towers.

Loss of connectivity habitat – impacting wildlife corridors to the National Park. Most of the retained vegetation on farmland is on ridge lines that will be cleared to make way for 113km of roads, underground cabling and towers, thereby causing loss of connectivity habitat.

Loss of habitat for threatened species – loss of 207Ha of Koala and Greater Glider habitat. Wind tower strikes with endangered birds (Little Eagle, Glossy Black Cockatoo and White Throated Needle Tail) and Bats, losing an important insect control in the ecosystem. Loss of threatened Narrow leaved black peppermint and other threatened ecological communities.

Therefore ref: 6.1.5 World Heritage Values p7 – flies in the face of other science.

Winterbourne wind farm is a destructive project by industry standards. The health of our natural ecology (and the people who will be negatively impacted, healthwise, by the project) should not be for sale. You cannot fix the damage once it is done to the area, including habitat that is being destroyed, and people's health.

The project is in the wrong place for these reasons alone and should be re-located.

2. Table 6.2.3.6. Traffic and Transport Noise:

Traffic and transport noise is a concern for the people of Walcha, especially for the families near the corner of Derby and Jamerson St which will be a major entry point from the Oxley highway to the work sites, according to the EIS.

The noise will be greater at this juncture because trucks will have to change to lower gears, the road is rough and and will also increase the noise level, and sound travels well in this area.

The noise will effect us 12 to 14 hours per day, 6 days a week, for 11 months of peak construction and there will be more trucks than stated, as there will be unknown additional traffic transporting gravel and water to the work site which are not numbered, as the developer does not know where these resources are coming from.

Therefore, this additional traffic is likely to be far greater than the traffic noted in the current traffic report. Hence, the noise pollution will be relentless and traffic congestion will effect the ability for locals and visitors to travel in parts of Walcha and to Armidale or Tamworth.

Add to this the fact that our roads are not in good shape and not made for these vehicle weights or intensity of heavy traffic. Roads will need to be fixed up prior to, during and after construction. Is Winterbourne wind farm going to pay for the road repairs, or reconstruction, if the project goes ahead? They should.

The Walcha council has already stated that it has no monies for road repairs. We have been waiting at least 7 years for total repair of Derby St north at a cost of 1.2 million dollars.

The community fund will not be enough to repair and rebuild the roads damaged by heavy traffic before, during and after construction.

The rate payers in, and around, Walcha cannot be expected to make up any of the monies needed; especially given that the Winterbourne Wind Farm project instigators will receive the majority of profits from the project – which will probably go overseas.

Traffic (including intensity, damage to roads, traffic congestion, and resulting debt) and transport noise will affect the health (mental and physical) and the well-being of the community.

3. Table EIS 3. Water Balance:

According to the EIS 3.2-4 Summary: “Preferred water supply during the development of the project has not been determined. It is anticipated that these will be identified when the design has been finalised and prior to the construction phase of the project. The project has identified four secure supply options for the water during the project’s construction period and include:
* Surface water collection from existing (or new) dams;
* Groundwater pumping from bores;
* Water abstraction from a nearby permanent water source; and
* Tanking water to site from council supply (including treated wastewater or other local Water Access Licence (WAL) owners.”

EIS suggests the requirement for 150ML. EIS also states 6ML for concrete foundations, but simple arithmetic of 20% of 760cu.m per foundation x 119 turbines gives 17.8ML.

Similarly, dust suppression has been grossly understated using industry estimates. Vesta’s Project Director had earlier stated that 220ML of water will be required. This would be a considerable underestimate – realistic calculation would suggest a conservative 675ML is required.

The scale of this water requirement is staggering – it will empty the Walcha storage dam, currently under construction, more than 2 times over. Put another way, it is 56,000 x 12,000L truck loads travelling on our roads, increasing the issues noted above in the traffic section.

It is of great concern that Walcha’s water supply is in the mix of options mentioned. We have recently been through the worst drought since 1955, in which we were not able to flush our toilets for fear of completely running out of the town water supply. Following this crisis the council secured funding for the building of the new dam mentioned above, which will hold 300ML and is backup for the town supply which is the MacDonald River. The MacDonald River is very low much of the time. If the EIS is proposing to take water from the river it will deprive Walcha and local towns of their “only” water supply.
This is totally unacceptable and I object strongly to this water grab at the expense of people’s needs in Walcha and other towns

4. Plans for Decommissioning:

The owners of the wind farm have not agreed to remove damaged towers or blades, or for decommissioning of towers. I have been informed that it can cost around $500,000 to replace a blade, and what about disposal? Is this left to the farmers? If they bury them think of the substances that will leach into the soil and eventually the water table? (The hazard of pollution is apparently the same for solar panels). Are the farmers expected to fill up their grazing land with junk that will pollute the soil and water tables? This will destroy our agricultural land and bore water supply, to say the least.

Furthermore, the developer intends to avoid any contribution to a bond, until they decide this "might" be necessary when their first assessment occurs at 15 years of project life. How many turbines may blow up or catch fire due to high winds, or fail, in the meantime?
No oversight, no arms length bond held by an independent party, and no insurance against financial default. This is a perfect recipe by the owners of the project for a "walk away."

This is not good enough and the error ridden EIS indicates an unprofessional and incapable project developer. Early errors pointed out to the planning department have forced their hand into publishing corrections – how many times can this occur before the EIS is totally dysfunctional?

It appears that the manufacturer and developer are taking advantage of the Walcha community and the environment, with little regard to the long-term impacts to both.

This is also obvious in the following concerns which I do not have time to link to the EIS information:

5. Neighbour benefit fund:

Neighbours to the project should be compensated, with no strings attached, for the effects of sound, flicker, flashing night lights, visual amenity, construction activity, loss of capital value etc that the development has imposed on them. All of which will affect their mental and physical health and wellbeing, and negatively impact the environment.

Neighbours who are impacted by this project should be compensated through a neighbour benefit fund. There should be no need to sign a Neighbour Agreement with confidentiality clauses and ongoing commitments. Neighbours are being coerced into signing contracts in order to get any form of compensation.

The Neighbour benefit fund, which was initially proposed by the developer, and recently scrapped, should be re-instated as this is the only fair course of action.

6. Diminished Aviation Services:

Spreading of fertiliser, seed and chemicals are under threat with Wind Towers creating a no-fly zone near rural airstrips, and low cloud conditions. National Parks also flag concerns with aerial wild dog baiting.

7. Increased bush fire control risk:

With wind towers creating a no-fly zone. Water collection from paddocks west of the project area, while the Oxley Wild Rivers National Park is on the eastern side of the project area. We lose our most important aerial tools for gorge fire control. Of particular concern is the location of wind towers against the National Park “Strategic Fire Advantage Zone”, critical to wildfire control.

EIS Table 3.3: Scoping of social issues and potential impacts p17-21. Social Impact Assessment. According to their own process, social impact was negative in 17 out of 25 issues considered. I believe that the negative impact was under-estimated and the positive impact was over-estimated. For example: It is very difficult for locals to get rental accommodation as there is often NOTHING available to rent. Very few locals would gain

employment given this is an agricultural area. Other examples are obvious when the above important issues are taken into account.

I doubt that the negative impact of the towers on tourism, after construction, in iconic visitor destinations and wilderness areas has been considered; or the impact of road congestion and decimation of roads during the construction period on tourism.

Please note: In the above submission, where I have not referenced particular research, I have written according to my own experience (personally and professionally), the experience of people I have spoken to in the community; and I have relied on the research done by the voice for Walcha group – especially in the latter concerns.

I am sure they would be happy to provide you with their research: https://voiceforwalcha.com.au

Final Recommendations:

1. That the Winterbourne wind farm project be abandoned in the Walcha area and the government look at options like the nuclear energy provision that can be set up in shipping containers; one of which could service Walcha for up to 60 years at minimal cost.

2. That the Winterbourne wind farm project be moved away from rural towns by at least 90km and placed where it will not cause any of the problems mentioned in the submission relating to people's, animals and wildlife's health and safety.

3. Address the above issues with Winterbourne if/when it is relocated; and do the same with any other potential developers. For example: Maintaining and rebuilding roads; local water supply; Neighbourhood benefit fund if applicable; disposal of turbines, blades, towers, footings etc when they break down or are decommissioned; impact on environment, flight paths and the like.