# Winterbourne Wind Farm (WWF)

# Application Number SSD-10471

The NSW Department of Planning and Environment guideline for the preparation of an EIS project of State Significance states that the content must be succinct, easy to understand, technically robust, reflect the community view, provide a comprehensive evaluation and justification of the project. The proponent must also be transparent and upfront in their engagement with the community to ensure a meaningful and tailored project, that has special licence. Furthermore, the EIS must take into consideration the Cumulative Impact of the project in conjunction with other projects of its sort in the region – there will be a succession of applications to follow!

This EIS is in conflict with all of the aforementioned objectives. It is not easy to understand, it is unnecessarily lengthy and technically weak. It has completely ignored the wishes of the broader community, it is not a comprehensive evaluation, it does not anywhere provide justification in a meaningful manner, for worthy consideration of its approval. It completely ignores the cumulative impact of other projects in the region. Moreover, it is full of mistruths, inaccuracies, notable omissions and contradictions, is misleading and confusing. Surveys have, I would suggest, been deliberately taken at the wrong times of the year to reflect a softer landing for the proponent. Had the Bird, Raptor and Bat Surveys been done in August, and had the noise assessment also been done in winter and to include recordings of ambient background noise in the evening, then the conclusions contained in the EIS would have been distinctly different than stated.

This document is nothing more than a work in progress by a developer that represents the 'brainchild' of eight hubris families. It does not represent the wishes of the broader community and as such does not have the social licence to irreparably wreck our beautiful rural and natural landscapes, nor the social fabric of this community. It is therefore a flawed document as I will attempt to explain in some detail in later passages, and as such should be withdrawn.

The concept of proposing to build the biggest Industrial wind farm in NSW, on the rim of The Oxley Wild Rivers National Park, that is habitat to UNESCO World Heritage Listed Gondwana Rainforest, and endangered species of fauna and threatened species of flora, quite frankly, I find outrageous, inconceivable and the most disrespectful act for the natural environment that I have ever encountered. It is an environmental travesty, that truly beggars belief – by an international company which sees this pristine landscape as nothing more than a dumping ground for, antiquated technology.

**Dunghutti (Djangadi) Country**

This developer that has no concept or regard to the delicate balance of nature that the local first nations Dunghutti people have overseen for thousands of years. In fact, Vestas has not

sought any consultation with respect to biodiversity or cultural heritage with the local Dunghutti people.

Ms Shannon Green-Griffin, spokesperson for the Walcha Dunghutti Bari Indigenous Council has told me, that before any further planning is undertaken of the development site, a detailed survey needs to be carried out in order to identify secret and sacred objects and ancestral remains. This site will need to be mapped to ensure they are not disturbed by the 113km of new roads and 119 turbine platforms and associated woodland clearing. This mapping will need to be done by competent personnel experienced in these matters and who have knowledge of lore, practices and people, objects and places that are valued, culturally meaningful and connectivity to the Gondwana Rainforest and Macleay catchments.

**Biodiversity**

A succession of protected areas lie within the Great Dividing Range that encapsulate the greatest biodiverse forests in Australia which apart from being home to critically important ecosystems, also provide enjoyment to thousands of people including tourists seeking relief from the built environment. The Oxley Wild Rivers National Park and its connecting freehold lands are one of these areas that are home to all creatures great and small and that provide a reasonable assurance of continued ecological stability for man, flora and fauna in this region. This development however, threatens these basic principles and ideals.

The development site sits on the western rim of the Oxley Wild Rivers National Park and UNESCO World Heritage listed Gondwana Rainforest Wilderness area. It is the catchment of the Gondwana Rainforest and Macleay River systems and all run-off from the project will flow directly into the World Heritage Area, and then onto the Macleay coastal region.

76% of the development footprint is native vegetation – 44% of which is threatened ecological communities (TEC) including Blakely's Red Gum – Yellow Box grassy woodland, Bendemeer White Gum (rare) and New England Peppermint grassy woodland, both of which are listed in the EPBC Act as critically endangered. This woodland is a prominent connectivity feature of the landscape. These corridors have been intentionally preserved as connectivity areas for fauna from the national park. They represent significant conservation areas and are particularly important following the Black Summer bushfires of 2019/20, when a lot of habitat within the national park was burnt out. Any clearing of these biodiversity corridors is going to have major impacts on the local flora and fauna.

The importance of these areas is demonstrated by a large number of plants and animals that are listed in both the NSW BC Act and the Commonwealth EPBC Act. The following vulnerable or threatened species that WWF has generated species credits for, are as follows:-

- Little Eagle (vulnerable)
- Glossy Black Cockatoo (endangered)
- Brown Falcon (vulnerable)
- Greater Glider (endangered)

- Barking Owl
- Wedge-tailed Eagle (protected)
- Squirrel Glider
- White-throated Needletail (migratory and vulnerable)
- Latham's (Japanese) Snipe (migratory)
- Australian Painted Snipe
- Brush-tailed Wallaby (vulnerable)
- Koala (endangered)
- Bluegrass (vulnerable)
- Narrow-leaved Black Peppermint (vulnerable)
- Yellow Box – Blakely's Red Gum grassy woodland
- Bendemeer White Gum (rare)

The Koala and Brush-tailed Rock Wallaby are on the developers list of priority species in a Threatened Species Action Plan. The developers themselves state "that they expect that the project will result in up to 206.73ha loss of Koala habitat (13% of all available habitat). Which may lead to a long-term decrease in the local population and may interfere with the recovery of the species. Considering the above, a significant residual impact is considered likely."

Similarly, the EIS states that the project is going to have serious impacts in the Greater Glider and the White-throated Needletail. Note: both of these species are listed as endangered or vulnerable, respectively. My research would suggest that many more species should be added to the threatened species action plan.

The turbines located on the ridgelines adjoining the National Park are going to result in the death of endangered and protected birds. The wedge-tailed eagle (protected), the glossy black cockatoo (EPBC Act listed endangered) and the white-throated needletail (EPBC Act listed vulnerable) have been identified as birds that will be at high risk of collision with the blades. The Oxley Wild Rivers National Park is a known breeding area of the wedge-tailed eagle and Vestas have identified that the number of wedge-tailed eagles is significantly higher than around other wind farms. The location of the wind turbines along the ridgelines is a death trap for wedge-tailed eagles that use the updraft from the adjacent gullies. It is also a death-trap for flocks of migrating white-throated needletails.

Contrary to the remarkably low mortality rates (3 to 4 birds – 7 to 11 bats) that mendacious consultants usually advise the government bureaucracy of, these monsters will in fact be chomping up on average 200 birds and 400 bats annually (Bernd Koop 2012) per turbine. Multiply that by 119 WWF turbines – government and Vestas, then have the **mass slaughter of 23,800 birds and 47,600 bats annually** for this one project alone on their conscience. But that is okay according to the EIS, because Vestas have agreed to pay $64 million in 'offsets' to government for a license to kill native fauna – think about that!

In Southern California there has been an 80% decline in the Golden Eagle population (Wiegand 2012). In Tasmania an 80% decline in the Brown Falcon (Debus 2022) and a 47%

decline of raptors in Oregon (US Fisheries and Wildlife Service 2012) since wind farms commenced operations. I would very much doubt that these wind farms are adjacent to wilderness areas, however the WWF is adjacent to a wilderness area, which will undoubtedly increase the collision risk with turbine blades exponentially.

The bird and raptor surveys were not conducted in August. This would seem to me to be deliberate, as this is the month that raptors are most active and vocal during the nest-building phase. By October half the adult breeding population is closely attending nests, rather than in flight. Thereby any survey conducted other than in August will understate the bird population by a significant number (Debus 2023). Surely, further surveys should be carried out at the appropriate time of the year. Furthermore, raptor densities are higher towards the rim of the gorge and along the ridge lines, however this is also the preferred location for the turbines –right in the flight path of these birds, that rely on updrafts to get airborne. **'This is the perfect storm.'**

Nevertheless, most BUS points were not located close enough to the gorge rims to detect a proper count of eagles in the development footprint. Once again, another factor in understatement of the real numbers in the EIS. Together with a risk assessment based on a 2mw (not 6mw) turbine, it is apparent that all figures for raptor numbers, movements through the rotor – swept area (RSA) and collision risk should be recalculated and searches for wedge-tailed eagle nests conducted in August. Claiming negligible impact on Wedge-tailed Eagles (EIS & BDAR) is a mistruth. The EIS notes that the Wedge-tailed Eagle, Little Eagle, Glossy Black Cockatoo and White-throated Needletail are birds that have an 'Almost Certain' risk of collision with the turbine blades. The EIS notes that a Collision Risk Model (CRM) be conducted for the White-throated Needletail, but it also notes that a CRM is NOT necessary for the three other species at an 'almost certain' risk of collision. Furthermore, it has been recommended (DEBUS 2023), that the risk for the **Wedge-tailed Eagle be upgraded to 'Certain'**. And given the fact that it is well-known, that the New England Tablelands is a hot spot breeding area for Wedge-tailed Eagles and Little Eagles, I would suggest it is imperative that both species be included in an accurate CRM to include the month of August and over a two year period.

A further issue for collision risk, particularly for raptors, is that the Winterbourne BDAR risk assessment was based on 2-Mw turbines of rotor-swept area (RSA) up to 150m above ground. Thus, many of the raptor records in the Winterbourne BDAR and appendices, discounted as being above the RSA, will in fact be within the RSA and therefore incur a higher collision risk, if 6-MW turbines are installed.

Far more rigorous studies with better sample sizes and design find lower eagle breeding productivity at wind farms than away from wind farms and the driving factor is turbine mortality of breeding adults (Balotar & Cheibao et al. 2016) For long-lived, slowly reproducing species such as large eagles, adult mortality is a key factor in population dynamics, and local windfarm mortalities potentially create a continental-scale population sink (Katzner *et al* . 2016). In Australia, this may particularly be the case with cumulative impacts, such as potentially arise from the multiple windfarms proposed for the tablelands adjoining the Winterbourne proposal (Debus 2023). Furthermore, limited carcass counts

beneath a small sample of turbines underestimate the real eagle collision rate being a small proportion of the total toll, because of the number of injured eagles escaping, dying off site or failure to find most carcasses on site because more often than not, other eagles and other scavengers sweep the site clean (Mooney 2012), between survey counts done only every few weeks.

Daytime surveys and RSA take no account that waterbirds as well as some migratory birds often fly out at night on migration or when commuting to feeding grounds. Once again grossly underestimating collision rates.

As I have mentioned previously, the woodlands under threat from land clearing for the development footprint contain rare and endangered species of Gums. Some of the trees are crucial habitat (hollow bearing trees) for fauna and are hundreds of years of old, predating European colonisation. Further habitat clearing for 113 kms of roads and 119 turbine platforms will be incremental for increasing the problem for threatened and other declining woodland birds and other endangered fauna.

The WWF footprint is far too close to the Oxley Wild Rivers National Park and Gondwana Rainforest Wilderness area and will severely risk compromising the Parks' primary purpose, i.e. to provide sanctuary to fauna and flora. It cannot be allowed for the Park to become the breeding ground for an adjacent **'killing field.'**

**Noise**

Wind noise guidelines

The NSW Wind Energy: Noise Assessment Bulletin, in the section 'Noise Limits and Objectives' states that the criterion for noise shall be:

> *The predicted equivalent noise level (LAeq,10 minute)*, adjusted for tonality and low frequency noise in accordance with these guidelines, should not exceed 35 dB(A) or the background noise (LA90(10 minute)) by more than 5dB(A), whichever is the greater, at all relevant receivers for wind speed from cut-in to rated power of the wind turbine generator and each integer wind speed in between.*

For reasons that will become apparent later in this analysis the above criterion shall not necessarily fit in with the main objective of this policy, and the proponent should be required to provide further information to demonstrate that the noise from the development shall *"not significantly affect living experience of people residing in the area."*

It is also important to note that the adherence to published noise guidelines is no protection against claims of noise nuisance as was demonstrated in the recent decision of the Victorian Supreme Court in *Uren v Bald Hills Wind Farm.*

Background Noise Data

The Sonus report presents noise data between 28 November 2020 and 1 February 2021. This coincides with the period of the year when most atmospheric inversions are rather uncommon, and the evenings are frequently affected by storm activity. The situation during

winter nights in the region is rather different. Atmospheric inversions are rather common, and storm activity very occasional. Nights are frequently very still and quiet.

**Vestas should be asked to present background noise data that reflects the probabilities of other seasons of the year, or otherwise stratify the existing data (if there is enough data to draw meaningful conclusions) that reflect background noise and the level of intrusion from wind turbines on quiet nights when an atmospheric inversion occurs.**

Furthermore, the proponent has not stratified the noise data to reflect the probabilities of high wind speeds at the hub height vs low wind speed at ground level. Yet, what is really apparent is that noise level (Table 11 in the Sonus report) is predicted to be in excess of 35dBA at times of high wind speeds at the hub. Yet in Appendix E, particularly with dwelling SR086 (but not only) the background noise level is frequently at the floor of the noise monitoring equipment at hub wind speeds of more than 10m/s. The difference is almost 20 dBa – i.e. a noise level increase of more than six-fold! It is beyond doubt that this difference is not consistent with the objective of NSW Wind Energy: Noise Assessment Bulletin that the 'noise levels do not significantly affect the living experience of people residing in the area.

Noise Floor of the Acoustical Equipment

The noise floor of acoustical equipment is a little less than 20dBa. This does not allow for an accurate measurement of the background noise level in quiet locations away from roads. The bias introduced by the noise floor of the equipment is evident in that the intensity of the plot values around 20dBa increases dramatically at wind speeds less than 8m/s. The average noise reading therefore flattens out at about 25 dBa as the wind speed approaches 3m/s. A visual inspection of the plot suggests that actual noise average level at 3m/s is probably less than 20dBa with a strong probability that many readings would have otherwise been less than 15dBa.

If the data was furthermore teased out between daytime and night-time readings, then the nocturnal noise level might frequently fall below 15dBa – particularly when ground wind speeds are zero. The suggestion that a noise level of 35 dBa is an acceptable intrusion, (i.e. a noise level 8 times louder than background noise at the quietest of times) borders at the very least gross negligence on behalf of the developer and acoustical firm involved and casts more doubt on the ability of the developer to satisfy the main objective of the NSW Wind Energy: Noise Assessment Bulletin. Even if the predicted noise level from the wind turbines is only 25dBa it will still be up to five-fold louder than the background noise levels.

**There are strong reasons to suspect that the noise floor of acoustical equipment employed, grossly overestimates the average noise in the quieter parts of the proposed development. Vestas should be asked to provide data that accurately reflects the average noise level and demonstrate how the proposed development would not constitute a level of noise intrusion that does not significantly affect the living experience of people in the area.**

Cumulative Noise Impacts

The broader extent of noise intrusion is not discussed in the Sonus report.

Wind turbine noise is reported to be audible to the human ear over 10kms away (Expert Review of the Evidence on Wind Farms and Human Health, NHMRC 2015). The known long-distance issues of wind turbine noise appears to reflect the role of low frequency noise and infrasound – particular the harmonics which ultimately become audible to the human ear.

The developer does not demonstrate that the cumulative noise impacts of 119 wind turbines have been considered.

**The proponent should be asked to clarify what input data was used when using these models, i.e. whether the modelling of noise was done in a way that reflects only the most proximal wind turbine or local cluster of wind turbines around each noise monitoring station, or the total cumulative noise impact of the wind farm. They should also be asked to justify why dwellings further away (say 5km) are not considered affected non-associated dwellings.**

The proposed Winterbourne Wind Farm project, even if the noise data of the proponent as accurate, is likely to generate a major noise nuisance that is unlikely to be benign or compatible with the local environment. The proponent's own data, despite the methodological flaws that work in favour of the project, suggest that at times the project will create noise over six times that of existing background noise levels. This is not consistent with the main objectives of 'NSW Wind Energy.'

**Infrasound**

The proponent does not discuss the issue of wind turbine generated infrasound even though it is a significant noise pollution issue. Ironically the most significant and dangerous under certain operating conditions as one would expect at the proposed WWF.

Wind turbines not only generate electricity but noise *annoyance* and 'silent' infrasound.

Infrasound (inaudible sound 0-20Hz) is a common phenomenon and occurs where large masses are in motion. This happens in nature with wind, storms, earthquakes and ocean waves for instance and many animals including elephants and whales also use infrasound as a means to communicate on their own private channels over vast distances. Whales communicate with one another across entire oceans.

Modern society has greatly increased its generation through technology and industry, including industrial wind farms. This increase in exposure to infrasound is historically unanticipated and has led to a growing concern among the public regarding its safety. This concern has been compounded by a wide spectrum of complaints which have been reported worldwide among populations exposed to infrasound, especially between individuals who are exposed to chronically high levels due to occupational conditions or by residing near industrial sources such as natural gas compressor stations, sewage pumping stations, industrial air conditioners and other power plants, like wind farms.

Thousands of people around the world have lived near wind farms for many years. They have found the noise annoying and quite loud at times, but it hasn't until recently made them feel ill or caused prolonged sleep deprivation. It has taken some time to realise the

problems are a result of 're-powering'. That's when small wind turbines are replaced with bigger, more efficient models (as proposed for the WWF) and now those same people are complaining to government and wind farm proponents. The standard response from government bodies such as the German Environmental Agency is that the infrasound is drowned out by the background noise (below75dBa). In other words, a perfectly normal noise level arises from which it is no longer possible to filter out the unique features of infrasound over a distance of 700 metres or so.

Infrasound is also measured in the Free State of Bavaria, however in order to identify possible explosions from nuclear weapons. Here the Federal Institute for Geosciences and Natural Resources, the BGR, operates a measuring station on behalf of the German Government. Because wind farms could affect measurements, back in 2004 the BGR team led by Dr Lars Ceranna examined infrasound emissions from a small single turbine. They found that every time the blade passed the tower it produced an infrasound signature, which is referred to as blade pass harmonics, that emerge from the background noise with distinctly higher acoustic pressure or energy, if you like. For bigger wind turbines, the scientist's made a model calculation based on a 5Mw turbine. **They found that an infrasound signal would be generated over a distance of 20km.** Far in excess of the background noise projection of 700 metres nominated by the German Environment Agency.

So how can this huge difference be explained? It is customary in acoustics to focus on bands. In other words, a group of frequencies, whereby the peaks are evened out and not on individual frequencies. So, an average reading is normally recorded, and this protocol is what government and wind farm proponents have been relying on until fairly recently. This would appear to be a deliberate ploy to ignore the infrasound peaks created by blade pass harmonics**.** *This is significant*. Unembellished data is now being called upon by the regulatory authorities. Here in Australia, exhibition of the Jupiter wind farm Environmental Impact Statement (EIS) was rejected by the NSW Department of Planning and Environment (DPE) on advice from the Federal Administrative Appeals Tribunal (AAT). The AAT directed that: There is a well-established pathway from annoyance to adverse health outcomes; a significant proportion of wind farm noise is in the low frequency range; humans more sensitive to low frequency sound and it can therefore cause greater annoyance than higher frequency sound. Even if it is not audible, low frequency noise and infrasound may have other effects on the human body which are not mediated by hearing but also not fully understood. **Noise measurement using dBa is an inadequate measure of relevant wind farm noise and wind farm noise measurement should not average noise over time and frequencies. Wind farm low frequency noise can be greater indoors than outside a dwelling.** Thus, an acoustical graph flattened to such a degree can no longer provide wind farm proponents or government with the argument that infrasound and low frequency noise (ILFN) from wind farms is swallowed up by background noise.

Infrasound has a very long wavelength compared to audible sound, which enables infrasound by means of reflection, refraction and diffraction to pass through and around different obstacles such as buildings and terrain. The long wavelength also allows infrasound

to maintain energy, remaining relatively stable after travelling very long distances. For this reason, common noise barriers are usually ineffective against it.

It is also common for infrasound to generate high energetic standing waves inside rooms of houses. This kind of resonance sometimes leads to an increase of levels of up to 25 dBz higher than the measured level outside the house and why complaints are more often about indoor disturbance instead of outdoor. For example, while some outdoor measurements may read 80 dBz at the same time in a nearby bedroom over 100dBz can be present. This could explain why the resident neighbours of Bald Hills wind farm, who 'had disturbed sleep hundreds of times after the wind farm began operation' would seek relief by sleeping in their cars at the local beach. Fortunately for them the Victorian Supreme Court last year awarded in their favour, albeit after they had abandoned their homes. This is not uncommon, as many people living near wind farms get sick. So sick that they abandon (as in shut the door and leave) their homes. Nobody wants to buy their acoustically toxic homes. The lucky ones get quietly bought out by the wind developers, who steadfastly refuse to acknowledge the Wind Turbine Syndrome exists (and yet the wind developers thoughtfully include a confidentiality clause in the sale agreement, forbidding their victims from discussing the matter further).

Infrasound has also been linked to how the brain deals with stress management. A team led by Professor Simone Kuhn of the Max Planck Institute has speculated that we are not able to defend ourselves against high levels of infrasound because what we consciously hear can be assessed and if necessary, ignored. But things that are only perceived subconsciously generate stress and perhaps even fear.

At present, infrasound (0-20Hz) and low frequency noise (20-500 Hz) are agents of disease that goes unchecked. Vibroacoustic disease (VAD) is a whole-body pathology that develops in individuals excessively exposed to ILFN. Since VAD is cause by ILFN and explained through mechanotransduction pathways, it is not surprising why it is taking so long to understand its existence.

There is also plenty of evidence regarding the damaging effect of infrasound on the heart. Another German research team led by Professor Christian-Fredrich Vahl at Mainz University Medical Centre conducted experiments on the exposure of heart tissue to infrasound. Every test revealed that infrasound did have a distinct effect on heart muscle tissue and a clear reduction in heart muscle strength. Professor Vahl went on to add that "whether we hear it or not, every form of energy has physical effects and infrasound is particularly dangerous, because we don't hear it." They concluded their research with the following footnote: As medical researchers, it is strongly recommended that infrasound levels generated by wind farms do not approach pathological levels. **It is the recommendation of this research group to set the level of infrasound no higher than 80 dBz** (dBz below the critical 100 dBz) as the maximally tolerated limit for chronic exposure.

Insomnia, heart problems, nosebleed normally in one's sleep, perception disorders, VAD stress, fear, mood swings, depression, burn-out and fight-flight response. These are some of the disease symptoms that can be caused by infrasound. Doctors believe that between 10

and 30% of people react to it. And that means it could impact on thousands of people in Regional Australia alone, not to mention the tens of thousands of farm animals and native fauna. A correlation of stress in humans and native fauna would seem to be a reasonable hypothesis.

The 6MW wind turbines that are proposed for the WWF are new generation and no one really knows exactly what amplitude of infrasound they will be emitting. Data is only available for much smaller turbines in the 2-3MW range that transmit averaged (a flattened graph ignoring blade pass harmonics/peaks with decibels expressed as dBa) outdoor readings of 50-60 dBa. But modelling, probability and common sense would suggest that a **6MW turbine will exceed the critical threshold amplitude of 80 dBz chronic exposure of infrasound over 20kms,** which will present as a health problem to any human, native fauna or farm animal living in a 20km radius of a 6MW wind turbine. My understanding is that would encompass the township of Walcha, as well as the National Park and southern fringes of the City of Armidale.

**Bisphenols - BPA**

All epoxy resins contain Bisphenol A (BPA) or similar bisphenol components. Epoxy resins are used in almost every part of our daily life (in a confined state) such as paints, plastic drink bottles, flooring etc and in the manufacture of wind turbine blades.

BPA is a highly toxic synthetic compound recognised by the World Health Organisation (WHO) as an endocrine disrupter that has been linked to about 80 diseases including cancer and reproductive disorders and can be lethal for young children. It has been confirmed by Vestas that epoxy resins containing BPA will be used in the manufacture of the turbine blades for the WWF. The blades however, will wear and then shed a fine dust of BPA throughout their life. This dust is spread wide and far by wind and if only one gram of it gets into dam or town storage waters, 10million litres of water is polluted and then rendered unusable. This dust (BPA in an unconfined state) from eroding blades has already covered large areas of our planet in proximity to wind farms and BPA is leaching into soils and waterways. Furthermore, the process is accelerated when the blades are cut up, dumped (on-site) and buried. When one contemplates that this will be all happening in the Gondwana Rainforest and Macleay catchments – it is a '**ticking time-bomb'**.

The wind industry openly admit that any turbine will emit approximately 62kg of microplastics per year into the atmosphere which will find their way into soil profiles and waterway. That would be the equivalent of about 50 tonne of pure unadulterated BPA pollutants over 20 years finding its way into the Macleay and Gondwana Rainforest Catchments. Think about that number and its consequences!

**Conclusion**

Believing the WWF will improve the environment requires an extremely high level of cognitive dissonance indeed, as its own EIS actually manifests complete disregard and disrespect for the environment. Should this outrageous development be approved, it will be a very, very sad and desolate day for Walcha and its environs.

The Oxley Wild Rivers National Park has had a long and treasured history with the community of Walcha both Indigenous and non-indigenous. A community that has strongly supported the Parks' evolution to include the Winterbourne State Forest and UNESCO World Heritage listed Gondwana Rainforest.

I fear the impact that this industrial development will have on the endangered flora, fauna and the community is too big a price to pay for short sighted financial gain by just a handful of hubris families (8) sworn to secrecy by an international developer who has underhandedly and who is anxious to dispense with antiquated technology in our backyard.

Should this scandalous proposal be approved, then all that will be left in a few short years will be an irreversibly trashed environment and traumatised man and animal left standing in bewilderment at this blight on the landscape.

Ian McDonald

Walcha Grazier and Conservationist.