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Reference: Winterbourne Wind Farm SSD - 10471

I OBJECT to the Winterbourne Wind Farm development.

- I declare that I have not made any reportable political donations in the previous two years
- I acknowledge and accept the Department's disclaimer and declaration.

I lived in Walcha for over 20 years, living on a family run cattle property. I look forward to my two sons being able to take over the operation of this successful family owned and run business when they are ready. My husband's family has been in the area for 4 generations. I am a Mother, wife, professional, environmentalist and I love where I live.

I am a full time professional, employed as the Operations Manager at the University of New England. I have extensive experience in the areas of project management, facilities management, financial accounting, environmental management, waste management, local government management, risk management, contract management, procurement, and public infrastructure management.

In my current role at the University of New England, I have seen first-hand the positive results of renewable energy with the success of the University's 5.2 GWh solar farm. Prior to my employment with the University, I have had over 10 years' experience in the waste industry, engaged in consulting for both private and government organisations. I have worked closely with national metal waste processors and have a solid understanding of the metal waste market.

I have approached this project with an open mind, eager to learn about this project's benefits to the Walcha community. My observations and interactions with the proponent over recent years, the changes in our community and my discussions with experts in fields of environmental science, Aboriginal Heritage, water, waste have lead me to doubt if this project if the right project for Walcha. I have reviewed the EIS documentation paying particular attention to the Decommission and Rehabilitation Assessment. Following my review of the EIS my conclusion is that this is the wrong infrastructure in the wrong location.

There is significant detail missing from the EIS, and there are numerous incorrect statements and assumptions. The quality of this EIS is below the standard required for a State Significant Development.

I do not intend to outline in full all the omissions, mistakes and what could only be seen as misleading information contained in this EIS. I am personally insulted that the proponents would believe that an EIS of this standard would be acceptable to the Walcha community.

I have selected some examples to highlight the inadequacies of this EIS, and reasons why I believe that this project is not the project for Walcha.

The Walcha community has and is experiencing significant social disruption and division as a direct result of this project. Community engagement has been grossly overstated in the EIS. Engagement has been primarily with those who have a pecuniary interest in the project i.e., land holders and neighbours receiving compensation. There have been rare opportunities to ask questions and find out more information, with the town office often shut. Those people asking difficult or complex questions about the project have been unfairly labelled as “against renewable energy” and shut down.

There has not been fair and transparent discussion in the community. In fact, the proponent engaged the Deputy Mayor at one point for Public Relations, even though this individual has no qualifications in the area. The only conclusion for engaging the Deputy Mayor would be that the proponent attempted to unfairly influence local government. This individual failed to acknowledge the conflict of interest, accused community members of verbal abuse when asking questions, and has since left local government.

I have emailed the proponent with questions about the Neighbour Benefit Fund and was told that it was best to have the discussion face to face, and would not provide any written answers to my questions. My questions were in relation to the functioning and governance of any Fund, and I wanted more detail of the “great benefit to the Walcha Community”, as proclaimed in the proponents’ statements provided to local media. The EIS fails to detail how the Neighbour Benefit Fund functions how it would be governed.

The proponent has displayed unconscionable corporate behaviour. Our neighbour, a high profile larger land holder, was approached to be paid compensation for houses on his property being able to see turbines. Surrounding neighbours, including members of our family, who will see numerous turbines from their properties, have had no offers of compensation. There has been an inconsistent and secretive approach to selected members of the community. My perception is that this project seeks to buy off those community members who have perceived influence in the community. The proponents have approached community engagement with the assumption that some individuals are more important than others, and any person not agreeing with the project are “ignorant and arrogant” (Please refer to open Community letter in Apsley Advocate by Katrina Blomfield, 2022).

The statement of people employed is not based on detail. Other renewable energy projects in New England have labour based in the large areas of Tamworth or Armidale, where there is accommodation and workers are then transported to site. Largely these workers are not local, and are only in the area for the project construction time period. A good example is the housing of foreign workers at Colleges at the University of New England and then bused to the solar farm construction site.

EIS does not consider the constraints on local services such as ambulance, health services, and availability of the already limited housing market in Walcha.

The roads network into Walcha are critical for those travelling for business, work and education. Vehicle counts in the EIS do not seem to be accurate and I question their validity. Road congestion

from this project will significantly negatively affect the Walcha Community. This includes livestock to market, my own travelling to Armidale for work, and my children's travel to Armidale for schooling. The roads proposed are unsuitable for the type and size of vehicles that this project requires.

Significant road upgrades and significant vegetation removal would have to take place. The removal of roadside native vegetation has not been acknowledged. Roadside vegetation significantly contributes to wildlife corridors and habitat throughout New England.

Traffic calculations have been based on one intersection which is not exemplary of all intersections. The intersection on Jamieson St and Thunderbolts Way cannot be used as a standard for project intersections.

Traffic will be flowing past the Walcha pre-school at peak times. Project traffic will be utilising roads that are also used by local cyclists and pedestrians. Walcha does not have substantial pathway system, and many of the roads identified in the EIS do not have a pedestrian path along them. I and a number of cyclists routinely cycle the routes identified in this project, and this risk to other road users has been grossly understated in the EIS.

Please note that the New England is not in a Waste levied area. The EIS does not indicate if there have been any discussions with the landfills in Armidale and Tamworth. The value of landfill space in regional NSW is valuable, and given the quantity waste produced during construction, maintenance and decommissioning of turbines may not be able to be landfilled in these non-levied areas. Landfills in Armidale and Tamworth are not required to take the waste from this project, and the possibility that waste may have to be transported and transported to a waste levied area is not considered in the EIS. There has been an international move to ban landfilling of wind turbine waste and as the number turbine projects increase in Australia, the government may look to follow the international trend to also ban landfilling of turbine waste. The financial risk of changing waste regulations has not been addressed in the EIS.

Decommission and Rehabilitation Assessment

There is a 20% variance plus or minus, that is a 40% variable in cost estimates. This percentage variable effectively means that the cost estimates cannot be relied upon to make a commercial decision. As acknowledged in the EIS scrap metal prices are volatile, hence why metal prices should be conservatively estimated rather than inflated. My discussion with industry suggests that they are only willing to accept separated metal delivered to their depot. The separation and delivery costs of the scrap metal needs to be accounted for in the decommission cost. The nearest depot is Newcastle.

The very fact that wind turbines have metal in their structure, does not make the metal recyclable. For a material to be recycled it has to be able to be separated and transported to a recycling facility. Many material components of wind turbines are not able to be separated, and those composite products that are recyclable, require specialist recycling processing which is limited in Australia.

Decommission should include complete removal of cement and all hardstand areas. The proposed project locations are prime agricultural grazing land and should be restored back to pre-project condition.

Site rehabilitation costs are understated. There is no detail of where material – earth, seeds, plants will be sourced from, and based on revegetation projects I have currently been involved in, the costs included for rehabilitation seem to be inadequate.

Underground cables are to be left in place at decommissioning. What this mean for future land uses and development has not been addressed.

To remove only 50% roads would seem in adequate. There is no detail as to what engagement with landholders will take place to decide which roads stay and which go. The decision to leave roads post project, should be mutually agreed by the proponent and landholder. A mandatory 50% would indicate that the proponent decides which roads are removed.

The statement in the EIS that “The overall cost of decommission and rehabilitation of the Project will depend on the adopted method of salvage and the extent of rehabilitation of the project” is troubling. Is this to say that the project will not completing rehabilitate project sites? This is another example of a claim in this EIS lacking detail and open for interpretation.

Several assumptions in the decommissions costs are underestimated including, vehicle movement counts and transport costs, heavy equipment site establishment costs, and the transport of substantial equipment such as shredders at each turbine site.

As a resident of Walcha, the number of alarming and upsetting issues grow as you consume this considerable EIS document. To summarise I consider that this project has a net negative environmental result when taking into account, native flora and fauna, traffic, waste, water and soil.

Walcha is prime koala habitat, and this project is not consistent with the State’ s commitment to protect Koala habitat considering the amount and location of vegetation removal of this project.

This project is located next to The Oxley Wild Rivers National Park, which part of is a component of the Gondwan Rainforest of Australia. This project results in damage to flora and fauna during construction, death rates of native bird life during the project life, over consumption of already limited local water and soil resources, risks of introduced pests, removal of helicopter fire fighting capabilities, removal of vital animal habitat, BPA shedding of blades, gas pollution from hazardous gas used in wind turbines, noise pollution and visual pollution.

The missing economics benefits component of the EIS raises several questions. Given the errors I have identified in the Decommissioning and Rehabilitation Assessment, I conclude that the economic benefits to the Walcha Community are not able to be quantified or in fact found to be negative and hence the proponent has chosen not to include. .

Please refer to the submission by Voice for Walcha which addresses in more detail the errors and omissions in the EIS.

In summary, I wanted to be convinced that this is a good project, but this is a BAD project. This is the wrong infrastructure in the wrong location.

Kind regards,
Kath Little CPA