

Submission – Winterbourne EISⁱ

Reasons for objection

1. Impact on land use

The land required by the plinths and exclusion zones around the towers, plus the requirement for access roads to each tower, create unusable areas of productive agricultural land at a time when food security is becoming paramount, and we need to maintain and preserve as much productive agricultural land we can.

Page 31 of the EIS says: *‘Wind farms are very much compatible with existing farming operations as the turbines occupy only a small amount of land, and landowners are able to continue normal grazing or cropping activities adjacent to these’*. However, during the quoted approximately 30 months construction phase, the disruption to existing farming operations will be considerable, with the road required to each individual tower interfering with the movement of livestock, and restricting the area available for cropping and pasture improvement.

I believe the towers could be sited on less productive or non-productive land in other areas of NSW; for example, coastal areas where the prevailing onshore winds could be utilised, and where the electricity produced could be transmitted over shorter distances to population centres, thereby reducing the investment required in additional transmission infrastructure.

2. Section 6 – Assessment of Impacts

a. Biodiversity

The EIS states:

The Project has the potential to cause impacts to threatened microbats recorded within the Development Footprint. Indirect impacts may occur through collisions with turbine blades. However, the Project is considered unlikely to result in any serious and irreversible impacts to threatened microbats (p.140).

I believe it would be irresponsible to continue with the Project when it has the *‘potential to cause impacts to threatened microbats’* or where there is *‘moderate risk associated with collision with turbine blades* (p.141) for birds. It seems to me that a collision with a turbine blade can only be considered a direct impact. And if a bat (or a bird or any other winged creature) does collide with a turbine, I am sure the impact would definitely be irreversible because I imagine the bat (or bird or other winged creature) would be dead.

I note that the words *‘where practicable’* occur in the proposed Biodiversity Mitigation Measures (pp.143-144). It seems to me that these words allow the Developer to defend any failure to carry out mitigation measures by saying that it was not practicable, a risk that I think we should be unwilling to take.

Siting the turbines in areas where both vegetation and wildlife are sparser and less critical to our environment would reduce the potential for harm to threatened and endangered species that are required to maintain and improve biodiversity in the proposed Project area.

b. Noise and Vibration

I believe it is impossible to predict either the level or the effect of noise and vibration by monitoring background noise. Some people and animals are more sensitive than others, not only to noise and vibration, but also to the flicker effect of blades across the light of the sun and moon.

I note the use of the words 'feasible' and 'reasonable' relating to noise management during construction phase. I feel that these terms are subjective and insufficiently concrete for anyone to estimate or predict the noise that might be acceptable to the proponent of the Project but not acceptable to the community in which the noise occurs.

Again, siting the turbines in areas where there are fewer people and animals would mitigate the impact of noise, vibration and flickering.

c. Landscape and Visual

Whatever items of visual interest exist in the current landscape will, I feel, be dwarfed and rendered insignificant by the sheer size of the proposed turbines. Therefore, it seems to me an impossible task to mitigate against the visual impact of siting up to 119 wind turbines with a tip height of 230 metres adjacent to the World Heritage listed Oxley Wild Rivers National Park.

I note that screen planting is listed as a mitigation measure; however, it seems to me that the growth of the plants would lag significantly behind the construction of the turbines, thereby losing any effectiveness as a screen for some years. Perhaps lower profile alternatives, such as vertical axis wind turbines, could be considered.

d. Transport and Traffic

It appears that there are no up-to-date road traffic volume figures, the most recent figures for the Oxley Highway and Thunderbolts Way being 2011. Therefore, the EIS estimate of the impact of the volume of traffic using the proposed routes is questionable.

The EIS states '*there are no pedestrian or cyclist facilities provided within the surrounding area nor in the vicinity of the Project Area*'(p.185). However, Walcha Council has recently received a State government grant to expand Walcha's shared cycleway and footpath network. The project includes new path along the entire length of Darjeeling Rd (Apsley Advocate 7 December 2022 p. 4; Northern Daily Leader 30 November 2022

<https://www.northerndailyleader.com.au/story/8001985/biggest-investment-yet-into-walcha-cycling-path-network/>). This is the proposed route along which the components for the turbines will be transported during the construction phase.

The estimated volume of traffic during the construction phase will have a negative impact from the aspects of safety: possible obstruction of emergency vehicle movement especially in the Walcha Rd area of the Oxley Highway where there is nowhere for a truck to pull over, increased possibility of collisions; noise; disruption to local traffic (especially impacting school buses); and possible conflict with traffic constructing the new path in Darjeeling Rd.

The mitigation measures seem to rely heavily on trust in the considerate and correct behaviour of the truck drivers, without the proponent really being able to control driver behaviour.

e. Aboriginal Heritage

The Project area has high social or cultural value for Aboriginal people, with some sites '*likely to be harmed through the construction of an access road and an underground electrical reticulation line.*' (Pp.249-250). The proposed mitigation is by 'a collection of surface artifacts' (pp. 249-250). I fail to understand how the removal of the artifacts is supposed to reduce the significance of the site, so the proposed mitigation does not make sense to me.

I note that other significant sites will be avoided and temporarily fenced 'if this is possible' (pp.249-250). No alternative action has been proposed if the fencing is not possible.

f. Soil and Water

The Project will require large amounts of water during the construction phase for dust suppression on gravel roads and for mixing concrete for the plinths for the towers. The EIS advises that '*Preferred water supply options for use during the development of the Project have not been determined*' (p.268). It seems to me that this project should not be allowed to proceed without this vital question being answered, since the potential impact is 'reduced environmental flows' and 'reduced water availability for existing licensed users' (p.269). There is also the risk of erosion at watercourse crossings and on newly constructed roads to tower sites (p.270). And while the 'majority of the Project components are situated away from watercourses and high flood risk areas' (p.275), it seems to me that the newly constructed access roads to the towers have the potential n heavy downpours to become rivers in themselves where the terrain is steep, resulting in erosion and sediment runoff.

g. Social and Economic

Walcha does not have capacity for an influx of workers seeking accommodation during the construction phase. The EIS indicates that to mitigate this, there will be '*Implementation of a Workforce Accommodation Strategy that manages impacts to local short and long-term accommodation arrangements in surrounding towns*' (p.297). It seems to me that documentation of such a strategy should form part of the EIS.

The Winterbourne Wind project is too big and in an inappropriate place. The proposed site is in an area of productive agricultural land in a small community with limited resources to support the material and labour requirements of a project of the projected size. Further, the attractiveness of the area, and therefore its economic potential as a tourist destination, would be compromised, with only those landholders with host contracts making money for a limited time, while the developer profits at the expense of the rest of the community.

Re Section 6 Assessment of Impacts:

“This Section 6 provides an assessment of impacts relevant to each aspect as detailed in the SEARs and Supplementary SEARs. Unless stated otherwise, the impact assessment has been under within the Development Site (i.e., Development footprint plus a 100 m buffer either side).” This sentence does not even make sense – under what within the development site?