

RESPONSE TO EXHIBITION OF STATE SIGNIFICANT DEVELOPMENT APPLICATION

Winterbourne Wind Farm

Application No	SSD-10471
Name	Rebecca – Ref: SR007
Address	Arran Park 1878 Winterbourne Road, Walcha NSW 2354
Position	Objection to proposal
Acknowledgement	I acknowledge and accept the Department's disclaimer and declaration



With relation to the Winterbourne Wind Farm Proposal (WWP), I would like to state my objection to the proposal in its entirety. I have researched the positive and negative aspects of the proposal. How will it affect me? How will it affect the environment? How will it affect the town of Walcha?

Throughout this research it became apparent that details from the Proponent were difficult to interpret. What information I did interpret seemed to add to my personal anxiety as answers to those questions posed were appearing consistently, the effects are increasingly negative. In fact any positive outcomes would be there regardless of where the Wind Turbines were located in NSW – power through renewable energy. This concept is widely supported throughout the community of Walcha and evident in my own household as we have solar power generation installed. Any anti-renewable sentiment is not what my objection is about.

My objection keeps returning back to the siting of the 119 230M tall wind turbine generators within a highly bio diverse area. This location in particular was circled by the Energy Minister as the New England Renewable Energy Zone (NEREZ) and published in the NSW Gazette on 17th December 2021, three months after the purchase of Arran Park was settled. However, this region has also been outlined by NSW Department of Planning and Environment as a sensitive Bioregion one of 16 located entirely within NSW borders prior to the zoning change (environment.nsw.gov.au). In fact, upon looking at the NEREZ, the proposal outlined for the Winterbourne Wind Farm is on the very edge of the Southeast border of the zone.

The table set out on the Department's website outlines the New England Tablelands as a bioregion in NSW. In reading the Bioregions of NSW document on the website the Department outlines in detail all the unique aspects of this region. As the NET encompasses a large area the subregion outlined as Walcha Plateau of which will be greatly impacted by the WWP. What is the point of identifying and outlining the unique value this area has to biodiversity if it gets swooped up unintentionally in an opposing development opportunity? Why do we plan for such diverging outcomes?

Why have there been no other appropriate options for siting the WWP? The responses we make to Climate Change should not be at the cost of the environment we want to protect. There are no unique resources offered to the Proponent utilizing this region other than the acceptance of involved land holders taking advantage of the income derived by the Proponent in using their land. All other resources the Proponent requires to achieve their objective needs to be transported to the area. The transportation of wind turbines is already fraught with difficulty due to the size of the components required to construct a WTG. The attractiveness of this site to the Proponent has not been explained but a very exhaustive document outlining the need to widen roads, engineer bridges, removal obstacles such as native habitat, transport water and so on. There is nothing this area offers the Proponent to be advantageous and beneficial for the completion of this proposal. The environment is impacted at every step of this proposal. The delivery, construction and operation of the WWP will have unreconcilable impact on the environment we are trying to protect.

Without the environment, especially in this highly diverse bioregion, the town of Walcha will lose its attractiveness to the region for tourism and lifestyle and will only have remaining agriculture and power generation in an industrial setting. How could we proceed with the WWP at the cost of habitat, flora and fauna and leave endangered and threatened species at the mercy of “mitigation and offsets” rather than a genuine effort to protect what we say is important to the Country, ne the entire globe in the name of Climate Change? Climate Change should not give social license to the Proponent to change the natural landscape so substantially in the name of generating power to protect the environment with the industrial scope of this proposal.

The Proponent is proposing the industrial scale development of 119 WTG’s, with the tallest WTG’s at 230M high concentrated over the valley floor of a unique agricultural setting. After researching this type of WTG, many engineers and scientific experts believe the taller the turbine the greater the spacing between and less required across the landscape to achieve quoted efficiencies. Again, I look for the positives in the WWP, apart from generating power by using wind and having no emissions whilst operating (emissions are generated as part of manufacture, delivery, construction and decommissioning) I can only find negative outweighing this one positive. Throughout the EIS the Proponent seems to be over optimistic in evaluation of the positive aspects and downplays the negative impact the WWP has especially over the environment.

Recently I read in the NETimes an article in response to the EIS, “staggering ecological cost of industrial scale wind farm construction”. It outlines that the Proponent will pay offsets outlined in the article at \$64 million. Instead of rethinking placement or removal of WTG, the Proponent prefers to pay the offset. How does an offset protect habitat and species? The “State of the Nation” report provided a scathing outlook on the way we protect our environment and the need to improve significantly. Is this a significant improvement? The “likely collision and mortality” of endangered and protected wildlife is worth \$64 Million? This proves to me the Proponent is more concerned with profits and revenue than with the environment the WTG’s have been lauded to protect from Climate Change. What are we left with? A clean environment without species and habitat to live within it?

The community relies upon common sense at every level of Government, which is why I believe it took time for the community to become involved. They were not encouraged with targeted marketing from the Proponent to get involved. They believed the “powers that be” would see the bigger picture and the WWP wouldn’t get off the ground. Many were surprised at the progress of the WWP as they had not had any correspondence with the Proponent and thought it was just a rumour (these observations provided by conversations at various events not hosted or attended by the Proponent). They were surprised when they started reading the information being presented by the “Voice for Walcha” team through the Advocate (local newsletter) and presence in town. I read one comment on their Facebook page a landowner seeing their own property heavily burdened by the WTG presence to their property without any

consultation to obtain their comments. Yes, we need renewables, but we need a larger conversation on the boundaries of placement, quantity and appropriateness of projects to the benefit of everyone not the Proponent and involved landholders as all Stakeholders have varying degrees of motivation in determining their own preference for environment verses money.

Renewables are used extensively overseas and have thoughtful placement alongside motorways (infrastructure readily available without additional impact on habitat and wildlife), off shore, inventive use of solar in carparks and one incredible turbine “The Squall Tower” in Dubai all of which show a sensitivity to visual, noise and environment over random locations in remote, rugged landscapes with difficult access and lack of infrastructure. It’s the siting that concerns me clusters of WTG’s close to the residents of non-involved landholders without consultation in addition to siting along sensitive Bushfire prone areas, heritage and aboriginal artifacts, ridgelines where Wedge Tailed Eagles soar and adjacent to National Park. Why? This is all for money not for the environment. The Proponent is set to make Billions of dollars (Foreign owned and manufactured) installing WTG’s in inappropriate locations and willing to pay whatever it takes to the Government in offsets for what damage they are knowingly doing. The Proponent chooses who benefits financially (Involved Landholders, Community fund) and if they cause mortality to birdlife, they just open their cheque book again and continue. The dead birdlife, endangered and protected habitat is hardly concerned with financial restitution but rather being left to live.



ARRAN PARK – SR007

We purchased the property Arran Park at the end of 2020. We had been looking for the perfect lifestyle property in NSW. We visited Walcha and were immediately enamored with the country town aspect of the township. Wide roads, small boutique shops, art and sculptures with wonderful atmosphere and people. Arran Park is not the type of commercial property the Proponent has signed agreements with. It is small by agricultural standard being 135 acres but perfect for a farm stay or B&B which is its future potential. Bird watching enthusiasts would love the variety of birdlife we see just in our backyard, Wedge Tailed Eagles soar high in the sky above us, Glossy Black Cockatoos visit the surrounding eucalypts in our paddocks, Galahs and Cockatoos cover our backyard with Grass Parrots, Bower birds, Willy Wagtails, Crimson and Eastern Rosellas, Firebirds, Ducks and so many more that I have had to reference my Australian bird guide! It truly is a sight to see and a delight to be part of and over the time living here I have many photos I can provide of the wildlife on our property.

Initially when we first met the agent selling the property, we were stopped by the outlook prior to even looking at the residence. Coming from Sydney where we overlook views to the cityscape east, we always thought they were interesting views but here, we look out over the entire valley floor being elevated on our West to East aspect with views out to the hills in the West. Sounds from various livestock carry on the breeze and stay with us due to the amphitheater style setting of the landscape. The Proponent took Public Viewing (VP48 in EIS) images from our driveway but they took those to the South not West where the views are abundant.

Arran Park has at least 50 acres of untouched Australian bushland on its East boundary where it is more untouched bushland behind until it joins the National Park. The Proponent would have you believe this region is, “agricultural land which has been previously disturbed and/or historically cleared”. Please don’t underestimate just how pristine and beautiful the natural environment of the Walcha region is as the Proponent tries to downplay this unique area in its descriptions. The entire purchase of Arran Park was due to this environment. I appreciate the need for renewables but will advocate for the natural environment over industrial developments where possible as the first time I see a dead Wedge Tailed Eagle will be my last - I would not be able to live here with the constant threat of witnessing its destruction.

Our plans for this property was to share it with people wanting to experience country nature at its finest. A few self-sustaining cabins (rainwater tanks, solar power, composting toilets etc), some friendly animals, the ability to unwind and go for bushwalks and bird watch is an invaluable asset to us. As a “lifestyle” property this was it for us to retire with and now if the WWP were to be approved, would have to encourage tourists who want to have the imposing WTG’s (within 2km of our residence and unfortunately closer as building sites were along our southern boundary bringing the structures within 1km of five WTG’s). This is obviously a threat to our future income without the additional concern of future value.

Discussions with a local real estate agent to obtain information or if they have evidence of reduced values resulted in some realistic information. He stated that resale would be heavily reduced. Since purchasing Arran Park, he has seen regional properties increase in value by 30-50%! This is due to the trending “tree change” and greater acceptance of working from home along with the technology that will allow this to happen. He suggested that prospective buyers would be put off by the WWP and would just choose to purchase property elsewhere.

Understandable. I doubt tourists would want to visit a cabin that may witness a bird strike and subsequent mortality, imagine the reviews. Please look at the size of a Wedge Tailed Eagle, get an idea of such a large creature mutilated by the blades and just like lobsters, mate for life!

Arran Park to us, SR007 to the Proponent, is a unique property in that it looks across the valley floor to the hills beyond to the West where the Proponent proposes numerous WTG’s. A thorough assessment of the impact has not been provided to us considering we watch sunsets regularly and now we are concerned with just how the WTG’s would flicker as the sun sets as they are all located West of the property.

In every aspect of reviewing the WWP I still can’t accept that it would not have been advisable to site the project elsewhere to protect the natural environment. Unfortunately for us that we were unaware of the change in zoning that scooped up this area on its boundary for the NEREZ. Trying to get away from the city hustle and built-up areas to move to the country and find the biggest development we have ever witnessed be proposed, there is no way even one structure of this size would be proposed in Sydney in the name of Climate Change.

COMMUNITY & STAKEHOLDER ENGAGEMENT

The Proponent states that, “extensive consultation was undertaken” I refute this claim. Both personally and what I have witnessed within the community. In general, it would be expected that initially the Proponent would mail out to the entire community especially non-involved landholders to introduce themselves, provide a small outline of the project and details on where further information could be obtained. If this did occur, I would like to see proof as I have nothing in writing from the Proponent other than what we had initiated. Our property and its proximity would have been identified to the Proponent in the scoping stages and yet they never provided us with the benefit of communication Primary Stakeholders should receive.

The Proponent has had minimal interaction with the community even when outlining their “community events” as survey results would have been substantially more in number of respondent’s than what they have quoted – 4 or so events with numbers as small as 25 participating in surveys. When Voice for Walcha held community events the Proponent failed to send a delegate. The Voice for Walcha team managed to get the community involved in participating in a survey not just at the event but continued to encourage the community to

have their say by their social media pages and continually through the local newsletter, The Advocate. The responses to their survey were widely circulated so that the entire community was involved over 500 local respondents – please consider this contrast in results when assessing community engagement and not allow the Proponent to hide behind the Pandemic.

The Proponent makes claims such as, “responses recorded in a stakeholder database”, “feedback from stakeholders relating to the Project has been generally positive” all while not speaking with non-involved landholders. Where is their database of contact with the rest of the non-involved landholders at the North end of Winterbourne Road beyond Arran Park? All discussions I have had with my neighbours during community events have revealed that they knew through rumour of the project but had never been contacted directly by the Proponent. That does not show that the Community Engagement the Proponent undertook included ALL stakeholders. They refer to our properties as numbers for their charts and maps but never gave us the benefit of knowing what our number was. I became aware of my number, SR007 due to the photo montage, I had a guess Arran Park was either SR007 or SR004 based on maps, google earth and the hard to read WWP map of all WTG’s trying to cross reference the data to come up with where Arran Park was on the Proponents map. Hardly conducive to Community Engagement. Why are non-involved landholders left to work out the references when involved landholders were listed within the documents?

The Proponent was more concerned with Arran Park agreeing to the terms and conditions of the Neighbour Agreement than our concerns regarding nearby WTG’s and the results of the photo montage. Just for the record the Proponent had offered \$10,000 annually as compensation for “the construction and operation of the Wind Farm is in proximity to the Land, including any visual impacts (including shadow flicker), traffic impacts and noise impacts which may result”; not to make requests “to provide any visual impact mitigation measure to the Land to minimize the visual impact of the Wind Farm on the Land or Dwelling”; “the Landowner must not bring, or procure any third party to bring, any Claims against the Developer or Other Persons in relation to any such impacts” – basically take the money and never hold the Proponent responsible for impacts the Land would receive.

They never discussed with us the full impact other than showing the photo montage. We have not received shadow flicker information even though they acknowledge that in the agreement. We have not received a full and thorough photo montage in line with standards relating to guidelines in assessing impacts. All guidelines such as not taking photos behind trees, giving good contrast to sky, landscape and the WTG’s to show the extent correctly were not followed when the Proponent provided the information. This instantly made me feel that the Proponent was not being genuine, they were offensive, dismissive and arrogant in their approach to our concerns such as our concern regarding Wedge Tailed Eagles their response, “they are protected not endangered”.

Engagement guidelines and Engagement Summary were not undertaken by the Proponent. Many of the summarized activities were not undertaken such as informing the community

through a letterbox drop or advertising, consulting the community through community information sessions such as what was held during the EIS exhibition by Voice for Walcha and sadly the complete breakdown of the Community Consultation Committee.

After the Proponent had presented us with the photo montage and Neighbour Agreement, we stated we would not be signing a agreement without further information on the WWP and since we have not had any contact in any form from the Proponent. I would like to state again that Arran Park is heavily burdened by this project and the Proponent thought that \$10,000 per annum would be enough to compensate for lack of future earnings, future value of the project and many other issues I will point out in relevant sections. To say we have been disappointed with their response would be an understatement. As a Primary stakeholder we would expect more from the Proponent in responding to our concerns with relation to such an enormous development and subsequent direct impact on our property.

The Proponent has made some nominal changes to placement of turbines. They state throughout the EIS the same thing, "Extensive consultation", "genuine engagement", "revised and refined over time....and in consideration of environmental constraints and the outcomes of community consultation". At no point has the Proponent been concerned of the WTG burden placed on SR007 (Arran Park). We approached the Proponent at the 2021 Walcha Show. At this point only having owned the property for 6 months. We wanted to know more and were open to discussing the project. At no point during our discussions with the Proponent did they offer to make adjustments to their plans. At every point they discussed the need for us to place "screening" around our property so that we could not see over the majority of the project.

The Proponent in their engagement with our family and in listening to our concerns provided a photo montage (Used in EIS) to allow us to view the impact to the property. This was in conjunction with pressure to sign a Neighbour Agreement. The photo montage was offensive and misleading. Offensive as the Proponents Landscape Architect took the photo behind the largest tree adjacent to our residence. Misleading as the photo seemed to be taken on a very overcast day not allowing the photo and simulated WTG's in the background from being obvious.

We insisted on a copy of the photos taken at a different position after outlining we witnessed the other photo being taken. Another montage was emailed to us but still not truthful in what we would see from their modelling. I had the montage in its three parts enlarged to A2 size, then I could really see the WTG's and my count is over twice the quoted amount on the "SR007 Dwelling Assessment" which is 23. The acknowledged standard for the creation of a photo montage, "generally mean clear skies, in suitably clear air to allow sufficient contrast between the different elements within the landscape....or for views where turbines are predominately viewed against the sky", which is the case for SR007 as our elevation means we see further and all the hills in the landscape are used for WTG's.

In the EIS document the Proponent used our driveway for Public View Point (VP48) and outlines a view to the South and not West where the majority of the turbines can be seen. I thought this must be a mistake and made contact with Moir Landscape Architects to seek clarification, their response to my enquiry has not been received. According to the public viewpoint (VP48) there are 60-79 turbines visible which is more in line to the count of turbines I made visually from the enlarged photo montage. What is the count exactly? Can an independent company assess this issue on our behalf because my experience with the Proponent has not been positive as they are aware of the truth but seek to circumvent the process to further their proposal.

VISUAL ASSESSMENT – SR007

To understand the scope of the project and its impact on Arran Park I needed to research why we are:

Viewer Sensitivity Level	Level 2 (Rural Dwelling)
Landscape Character Unit	LCU07 Winterbourne Road
Scenic Quality Rating	Moderate
Visual Influence Zone	VIZ1
Number of 60 degree sectors	3

Here is what I have understood from the standards used to rate a project against its impacts on non-involved neighbours. Three sectors of viewable WTG's is not a great outcome for that property. The Proponent understands that this means they need to justify why they have placed the WTG's and not relocated, removed or mitigated the impact for this property. Their only mitigation technique is to use screening. The standard as outlined by the "Visual representation of wind farms". However, written in the assessment is the 'downplaying' of the turbines seen, "however, existing vegetation is likely to screen views toward a number of turbines located within the 3100m line and which make up one of the three sectors. It would be reasonable to suggest the turbines would only be visible in two sectors which is acceptable for a receptor with a viewer sensitivity level 2". Essentially the Proponent would have you believe that the natural landscape they are relying on to "screen" the WTG's will remain in front of the WTG's after they have constructed them.

I believe a lot of the screening will be cleared to enable construction of the WTG's and therefore the Proponent underplaying the significance of viewable turbines is unfair and misleading. The photo montage I have received the second time shows over 50 turbines across 4 sectors. Under the Visual Performance Objectives, Visual Influence Zone 1, "Wind turbines should not cause more than a low level modification of the visual catchment".

In addition, I believe turbines B056, B057, B060, B061 and B062 will be constructed at the same elevation as the hill shown in the photo montage and can't understand how only the hub and

tips are visible at such a short distance (under 2km). It would mean the turbines are being placed significantly lower in elevation than the hill in the montage.

The Visual Influence Zone 1 with Viewer Sensitivity Level 2 (moderate sensitivity) as outlined in the Wind Energy Visual Assessment Bulletin states, “avoid views to the proposed, existing and approved turbines within eight kilometres from level 1 and level 2 viewpoints, exceeding the following thresholds, or provide detailed justification” - “wind turbines visible within the effective horizontal views in three or more sectors”. Under the guidelines I believe the Proponent has underestimated the amount of sectors and severity of visual WTG’s. As such I would appeal to the Department to appoint an independent assessment for the impact to SR007. Also, the Proponent has not extrapolated whether the WTG’s will cause shadow, flicker and blade glint for more than 30 hours per year. This modelling should have been undertaken and provided to me prior to the EIS exhibition.

How will any aviation lights affect the property when over 50 WTG’s are viewable? If 50 are viewable now with current trees and obstacles how can the Proponent guarantee that this vegetation will remain in place to be used as screening when all aspects of construction indicate a large removal of trees for construction and landing as well as road and track widening? As such I believe the WTG’s outlined on the WWP should be counted as viewable as a worse case scenario and respective mitigation or agreement made.

Mitigation:

The Proponent only offers screening close to the residence to reduce the impact to the residence (not the property) visually. In fact the use of trees and shrubs so close to the residence is an inadequate mitigation technique as a Bush Fire Prone area needs to reduce the vegetation close to premises to reduce possibility of ember attack. Arran Park has its fair share (approximately 50 acres) of native vegetation primarily concentrated to the rear of the property (East) and reduced amount to the front of the property (West) to maximise the outlook – none have been planted since we have owned the property.

Management:

According to the bulletin, “where significant impacts are predicted to occur, it is a possibility that the Department will recommend that these turbines be re-sited, or removed from the proposal, or only be recommended for approval if appropriate mitigation or management measures are in place”.

The fact that SR007 can see across 4 sectors means that the Proponent needs to re-site or remove one or two sectors viewable from the property. The WTG’s B056, B057, B060, B061 and B062 be removed as they will be the only viewable WTG’s in one sector and the re-siting of B001, B002, B003, B004 and B005 to relocate away from the fourth sector as they are clearly visible on the photo montage regardless of distance. The reason they are clearly visible possibly due to our elevation and the landscape.

NOISE

Due to the proximity of the WTG's listed above I am certain that we will be impacted by noise. I believe the Proponent is using the guidelines to establish their base line of background noise. This is due to the fact that the Proponent placed the noise monitoring set up at SR109 which is situated within a densely vegetated property – over 800 acres of non-cleared native bushland further from the project in a North East direction from SR007. After researching tactics used by Proponents and as cynical as it sounds the use of this position is to record the sound of wind blowing through trees to increase baseline background noise. As SR007 is in an elevated position, within 2km of the nearest WTG this baseline they establish will minimise the overall noise produced by the WTG's when in operation as they had a higher baseline to start with.

Considering I am no noise expert and I have no training in such technologies I can only utilise the independent acoustic engineering company (L Husson and Associates) engaged by Voice for Walcha. The points raised by this specialised company only concern me in the unreliability of the Proponent to give thorough and rigorous research in what they are proposing to the community.

How can involved Landholders be the only ones affected by noise over the limits outlined by NSW Planning as stated by the Proponent? SR007 estimated noise by the Proponent is 32.8dB which is a convenient measurement when the limit is 35dB. How can noise not impact on the property when it is elevated looking over all of the WWP? The cumulative effects of all of the WTG's and the layout of the landscape could easily amplify the sound. I cannot trust the information provided within the EIS when an independent acoustic specialist refutes the interpretation and presentation of the noise report within the document. Points such as; "from a scientific point of view every 10dB increase in sound level is heard as a doubling in loudness." "There is a very high likelihood that hundreds of properties, currently considered as unaffected by sound, will fall outside the allowable legislated limits and a new turbine layout will need to be proposed."

Mitigation:

Removal or re-siting of closest turbines as outlined.

Double Glaze or soundproof residences impacted

Limit working hours on Saturdays (require application of permits when they want to utilise longer working hours.

Management:

Continual noise monitoring from SR007 with fines and compensation established for any non compliance of the stated levels. An independent arbitrator to ensure that complaints are handled with priority and rectification within set out timeframes. Fines should be substantial and provided to the Community Fund.

DELIVERY

There is considerable amount of detail within the EIS with relation to the delivery of the WTG's. Traffic is essentially going to impact any road user throughout this phase not just within Walcha. As I spend a lot of time between Walcha and Sydney I am very aware of the various routes the Proponent has outlined. On paper this all looks achievable however using these roads is an entirely different prospect. Due to the weather events over the past couple of years all roads within NSW have deteriorated. A lot of major road repairs are underway on top of normal road maintenance road users need to travel through. There are some points I will make in the general routes chosen by the Proponent.

Leaving the Port of Newcastle to travel to the Hunter Expressway is time consuming for a standard passenger vehicle not OSOM, Trucks and Dogs or B Doubles. John Renshaw Drive has been challenged with huge time delays in both directions. Anyone using this road and bridge to get to the Pacific Highway (North) or South to the Hunter Expressway will be delayed until the development of the bypass. The project is in planning and is expected to commence late 2022 and finish late 2024 ([Investment.infrastructure.gov.au](https://www.investment.infrastructure.gov.au)). This project is not outlined in the EIS and the expected delays are not calculated in the delivery of components for the WWP.

Alternative routes available to the Proponent to Walcha are limited. Ideally the use of the M1 and Pacific Highway would be more suitable to a large volume of speed limited trucks. More lanes, better roads, weigh bridges etc are available as well as well serviced rest stops for drivers. However, getting from the Pacific Highway to Walcha entails driving on the Oxley Highway and due to land slippage only one lane is available on large sections of this road with stop/go intervals frequently used as they repair one lane. There is no way trucks of this size could utilise this route while this is underway. In addition, any widening of this circular steep incline would only increase the timeframe for delivery of this project.

The only other available alternative would be to use Bucketts Way and Thunderbolts Way via Gloucester. This road is undergoing extensive repairs and widening presently in some parts. Thunderbolts does see some large logging trucks use the road, but it is very steep and dangerous for both trucks and passenger vehicles in some parts. Quoted speed limits in the Traffic Impact Assessment are incorrect as it ranges from 80km/hour up to 100km/hour. The TIA also misquotes local speed limits within Walcha which is 40km/hour in shared zone and 50km/hour within Walcha and just to reiterate the lack of attention to detail, Winterbourne Road is not 110km/hour and trucks should not be travelling at this speed by law.

Although the detail included in the Traffic Impact Assessment is adequate the reality of the state of the roads is a lot of work is required prior to delivery of the components to get the trucks moving. Again, I outline why the scoping report didn't find an easier to reach and access

site for the WWP than Walcha. The work that needs to be done to get the roads up to a serviceable level would be better utilised to site it elsewhere closer to significant infrastructure rather than this constant battle of impacting on so many communities and road users outside of the project area. There are many factors that can impact the delivery of the WWP before construction gets underway the concern for me being extensive delays on the project overall. As much as the suitability of the project is an issue if it were to be approved what is the Department putting in place with relation to Liquidated Damages? Further delays will impact Walcha extensively with relation to tourism and service delivery to the township. Any loyal tourists would not want to waste their valuable holiday time battling traffic to get to their destination they will just choose an alternative destination. There are large groups that regularly visit Walcha as they (Motorbike Clubs, Caravans etc) enjoy the scenic drive and lack of traffic on local roads. This project will do nothing but have a negative effect on this perception. If it is delayed in its delivery the result could be catastrophic to the local economy relying on these tourists.

The Proponent will refute this by saying the truck drivers of these trucks will need a place to stay and somewhere to eat – this type of custom is temporary whereas the tourism is constant. Once the tourists are put off a lot of effort will have to be put in place to encourage them back – but to what fields of industrial wind turbines? Lack of biodiversity, a landscape of freshly dug up habitat and felled trees with dirt tracks leading to clusters of enormous turbines. So long as they come to view the landscape from behind trees as depicted in many Viewing Points outlined by the Proponent in their photo montages they may not notice all the turbines being earmarked for the region. Has there been any analysis on the impact Wind Turbine Developments have had on local tourism in other small town communities?

Traffic within Walcha currently does not exist. Being a person that uses roads within NSW extensively there is no traffic at all in Walcha. No traffic lights a couple of pedestrian crossings and a lot of effort in beautifying the street scape. The Proponent needs this removed and that removed, a tree, a sign, widen this, cut through that without any true empathy toward the local road users of town. The school bus, the vet and some other road users get special mention but unless they paint their vehicles bright yellow truck drivers are not going to notice who is who. There are many issues with the report for a local road user. Speed limits are misrepresented and misquoted. When there are this many errors in an official document how can we trust the information provided in its totality? For the residents to the North of the project on Winterbourne road they get to navigate the entire projects trucks and traffic to get to town. Currently a trip to town is 30 minutes for 30 kms. Sometimes longer if farmers are moving stock or some other road block.

The outlined traffic during delivery and construction phases of the WWP will place a burden on landholders along Winterbourne Road. The traffic of estimated 288 heavy vehicles and 270 light vehicles per day sounds OK in theory but when broken down between quoted working hours and stoppages for school zones there will be a new vehicle (ie. Not a local motorist) arriving

into or out of town every minute. My 30 minute drive theoretically will involve either sitting behind or overtaking 30 vehicles whereas currently I rarely see one. I'm not going to analyse every detail even though I have read it all other than to say the Traffic assessment indicates a truck will slow down when approaching a cyclist. I am more concerned this assessment did not quote the ACTUAL road rules when passing a cyclist. Under 60km/hour you are to provide 1M of passing space and over 60km/hour 1.5M. This passing distance is not equated into the width of the road heading to the various construction sites along Emu Creek and on toward Winterbourne Road. Noise from these vehicles will be ongoing throughout every day, every minute of the day and the Proponent does nothing in the document to mitigate this and defers a Traffic Management Plan for a later date. I was of the understanding the EIS was the final document in outlining exactly how the Proponent will deal with every aspect of delivery of the WWP not defer everything until commencement. Having experienced their level of care and consideration these statements concern me a great deal. Like providing a Developer with a blank cheque rather than the Developer earning the right to make so many extraordinary impacts on so many areas of the environment and the community without boundaries or consequences for non compliance.

MITIGATION:

Speed limits on all heavy vehicles throughout the town and the roads to the construction site to 40km/hour – this reduces noise and allows motorists the opportunity to overtake safely. It also protects pedestrians and cyclists sharing the roads as there are not designated lanes for riding and walking throughout the route. Will make it easier for trucks to conform to the next point.

No compression braking near premises

No deviation from selected route even if there is a road blockage

Limits to the amounts of trucks accessing the construction zone at one time as to ensure there is no bottleneck and lining up of vehicles to be unloaded creating extensive delays for local road users.

Outlined permanent working / driving hours with no deviation allowed

The Proponent to maintain live information on the NSW Live Traffic App

A clear and concise traffic management plan prior to approval that can be viewed and commented on as the EIS seeing as the Proponent having over two years has not had the time to complete it.

MANAGEMENT

Heavy fines to the Proponent and rectification measures for continual breaches. Funds to go to Community. A hotline or call centre for complaints handling and collating information on compliance on a weekly basis to be forwarded to independent authority for management measures.

COMMUNICATION

Again the Proponent is depending on the wait and see approach to the EIS response. Currently, landholders at the Winterbourne Road end of the WWP have to install a booster to receive mobile signal. We do not have cable internet, we could possibly install Star Link but general services community receive in towns and larger cities are not the norm for rural properties. Arran Park has a booster, installed at considerable expense. Along with Digital TV and Sky Muster. If we lose power, we lose the lot. Leaving only the Telstra Land Line as a suitable way of reaching anyone in case of emergency.

The Proponent does not have a firm response as to whether the WTG's will impact on reception of these services. This is not an adequate response and not knowing for sure and waiting to see is certainly not going to work for me. From the DNV Report, "For areas where the reception is marginal such as those where an external antenna is required the possibility for interference exists if a WTG intercepts the signal between a mobile phone and a the tower".

MITIGATION:

Removal of WTG from WWP if DNV are unsure if it will intercept the signal.

MANAGEMENT:

Installation of Star Link at cost to Proponent including ongoing costs if solution is not made a priority leaving landholder without communications.

BUSHFIRE

The Proponent shows a detailed map of the Bushfire Prone area. The entire East boundary of Arran Park continuing through to the National Park is marked as a Bush Fire Prone area. Hardly news to the local landholders here who experienced the frightening prospect back in 2019/2020. Arran Park fortunately did not ignite. This does not remove the risk though as back burning has not been undertaken in a lot of the areas still burdened with heavy fuel loads from dead trees and underbrush. The nearest WTG's to this zone are B056, B057, B060, B061 and B062 bordering on the edge of the zone but not sitting within it. However, this does not preclude the activities during construction and operation from starting a fire. If this were to occur during high winds we would be at the mercy of ember attack on surrounding bushland then spreading to homes.

The biggest threat to the environment is Bush Fire. Loss of habitat, threatened and endangered species mortality along with livestock, fencing and homes. This is not a topic to be dealt with lightly. After the enormous fires burning throughout NSW in 2019 and 2020 habitat loss was catastrophic and measures were put in place to further protect habitat and the environment. The State of the Nation report did not understate this, and Government response should be consistent with this in mind. Climate Change is the culprit and now we look at siting WTG's in response to Climate Change while threatening the very environment at risk. WTG's should be sited in accessible areas. During construction any accident can happen to ignite a fire. Many machines, vehicles and tools are in operation that could cause a fire. Why place the WTG's so far away from emergency response. During a fire early intervention can reduce the spread and overall impact the fire can have. This is why I believe construction should be well away from Bush Fire Prone zones as outlined on the map in the EIS. The Proponent describes speed of fire along ridge lines but still proposes WTG's in close proximity to enormous fuel loads bordering on the National Park. Just because the Proponent draws a line around the project area does not mean the line will stop a fire from spreading.

After having witnessed the recent fire of a WTG in Goulburn it is obvious that a fire of a WTG is left to burn. What instrument can be used to put out a fire burning at over 150M high? What would happen if the listed WTG's were to ignite in high winds spreading quickly to the National Park. It is an unnecessary risk to the environment and property. An exclusion zone as outlined in the EIS is not sufficient in case of winds – if we didn't have wind the Proponent wouldn't be here so its not an unreasonable assumption. The fire in Goulburn is an example of how we blindly trust whatever the manufacturer states. Why would we question the possibility of a malfunction of this magnitude? These documents required of Proponents are to discuss all of the possibilities not just accept the “tick and flick” form stating compliance when in reality it's a wait and see approach. The “What if” scenario should be robustly argued and if no agreement made then the mitigation must be thorough and well thought out. Unfortunately, we are not

able to see the “well thought out” plan of the Proponent. They seem to believe that all plans can be thought out AFTER they are awarded the project approval. This shows me the Proponent believes their WWP will be approved for the “greater community” as was the case quoted in the Departments documents from Land and Environment court. I sincerely hope that this is not the case in this instance and every possible scenario is discussed and weighted accordingly the environment deserves this attention to detail.

I am anxious when thinking about this topic regardless of a WWP. How quickly can the RFS get here, do they know, what can they do etc.? With this proposal I have added anxiety for those questions as what if the communications are down, what if there is so much traffic it hinders a response, what if the WTG’s impact on aerial defense and so on? Why don’t they design WTG’s with inbuilt sprinkler systems or method to extinguish a fire? Should the Proponent have a generator, pump and independent water supply at each WTG cluster for immediate response to fire? At this point we don’t know the capabilities or what the Proponent can do because they did not provide a Bush Fire or Fire Management Plan (BFEMOP).

MITIGATION:

Without a detailed plan this sort of response is a waste of time but hopefully the Proponent is capable of installing fire fighting equipment to support each cluster of WTG’s. Not a few but a lot as they can utilise additional equipment at the one site in readiness of the RFS response.

An alert system for the area via SMS and alarm to notify neighbours immediately of fire so they can begin their own Bush Fire Readiness plans as recommended by the NSW Rural Fire Service. A Fire Marshall or representative provided by the Proponent to liaise with neighbouring properties to ensure they have enough notice and vulnerable people are considered for evacuation immediately until the fire is under control

Detailed and thorough inspections signed off by Engineer prior to any noise complaint or identified maintenance issue. A constant monitoring in person (not via computer program/interface) of the WTG’s on a weekly cycle available for public viewing to ensure maintenance is always ongoing and scheduled and equipment tagged and tested.

MANAGEMENT:

Again, the installation of an independent body that will record all non-compliance.

A restitution plan for at fault accidents that impact on non-involved landholders.

Compensation for increases in insurance premiums due to presence of WTG’s.

BIODIVERSITY

As outlined earlier in this document the issue of the natural environment is the crux of appropriateness of the location for the WWP. All of the documentation in the world is not going to protect the biodiversity of the area as it will be impacted as soon as the Delivery phase of the WWP is underway.

A large amount of trucks, no doubt travelling at night (cannot leave Port of Newcastle and arrive in Walcha without 5 hours travel time but a full schedule is not provided as to when trucks leave PON) will increase the incidence of mortality for native animals on the roads. No mention of this “road kill” potential or how the Proponent will mitigate these issues with tunnels and road crossings for native animals along the route as has been installed on the Pacific Highway. I understand there is always the possibility of striking native animals on the roads, but the additional threat is there when a truck a minute is added to the traffic on the roads with just this project when others are coming online at the same time.

The route didn’t include where high incidence of native animals would be present, the local councils would be able to provide this information. There is a high population of Wombats on the Thunderbolts Way route as I am sure there are Koala’s crossing and other natives on other routes not identified.

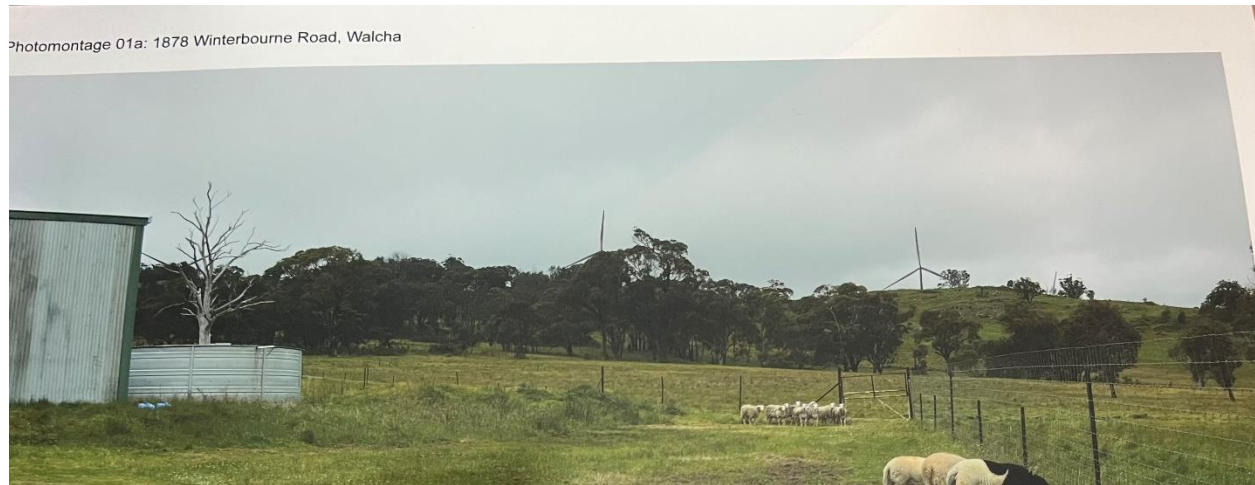
The Proponent believes they have adjusted the WTG plans in response to recognising threats to native species and yet the 5 WTG’s closest to SR007 have regular bird presence such as Wedge Tailed Eagle and Glossy Black Cockatoos. As I sit here writing this I look out to that area and see them and hear the call of the Black Cockatoos in the distance. This is no exaggeration (see photos taken 19th January 2023 original can be provided) the Proponent wants to provide details after the commencement of the project on how they will manage this. Once operation of the WTG’s commences there will be many Wedge Tailed Eagles vulnerable to bird strike. Their behaviour and breeding cycles will be greatly affected as this corridor has a high presence of this unique creature not to mention the cumulative effect as other projects come online.

I mentioned to the Proponent representative that there is technology utilised elsewhere that uses radar to detect their presence and shuts off the WTG, he simply laughed at me and said there is no way that would be installed on the Vestas WTG’s. How is this a genuine concern for our environment? If the technology is available, it should be used as a mitigation, but the Proponent won’t volunteer this mitigation as it costs them money to install and maintain. How many birds will have to be killed prior to a response? This should be something we are proactive about and place a minimum standard solution to the issue on all WTG’s regardless of where they are installed. The Proponent does not offer significant thought to this bird as the Eagle is not listed on the Threatened Species list but is however Protected (this comment I have mentioned before).

Photo taken with iPhone



Photo of montage taken with iPhone – still unsure of elevations and levels of the 5 WTG's on the ridge behind the foreground. If they are at 1000m elevation and the hill in foreground is the same elevation shouldn't we see a great deal more of the WTG's than what is simulated and would request an independent assessment on the elevations and levels as the WTG's are 2km away.



This is just a small snapshot of the potential interference of the WTG's to the natural environment. There is a lot the Proponent is going to impact with relation to the WWP not just the Wedge Tailed Eagle and Glossy Black Cockatoo. Simply stating on paper what mitigation they will provide does not mean that this will occur unless there is independent oversight by a team of relevant professionals. There is an enormous amount of detail in the document about providing this and that but without a program of the plan in detail how can it be assessed for its suitability in mitigation? The Proponent would rather wait and see yet again on how this is accepted rather than offering genuine solutions that have plagued this type of project worldwide.

Upon researching other installations of this scope, I discovered the objection to a development in Tasmania (Robbins Island Wind Farm) by Former Senator and Greens Leader, Bob Brown. Specifically having issue with Wind Turbines killing native bird life. In addition, the Former Greens Leader outlined all the visual amenity the Wind Turbines will have on the unique environment of the Island. He stated the clean energy benefits of the project are far outweighed by its impacts on scenery and bird life. In addition, he stated, "has not been properly informed of the private deals, or public impacts or cost-benefit analyses (economic, social, cultural and environmental) of this, one of the biggest wind farm projects on Earth...." "Mariners will see this hairbrush of tall towers from 50km out to sea and elevated landlubbers will see it, like it or not, from greater distances on land." No one could argue that a man formerly of a Greens political party has issue with renewable energy but again, the appropriateness of the placement of such a development.

The solution, (identiflight) was being tested in 2019 is the installation of the radar technology to detect the bird flight path and switch off WTG in its path.

In addition to the WTG infrastructure, an increase in the amount of overhead transmission lines will also impact the Eagle as it is recognized as a source of bird mortality currently. In this case and in keeping with current trends (such as Snowy 2.0) all transmissions lines should be installed underground. This will minimise impact visually, bush fire potential, native habitat and species impact. All through the EIS the Proponent has the option to remove a risk, reduce the risk, mitigate the risk or pay offsets. It seems the Proponent takes mitigation and offsets as the default rather than remove or reduce risks. Removing the risk of bird strike or additional obstacles for bird life will cost the Proponent but not removing the risk will cost the environment and the region – a cost that cannot be compensated by offsets.

SOIL, WATER, WASTE, STORM WATER ETC

As with many of the Proponents requirements plans for the management of these resources will be forthcoming. The potential for contaminants with truck movements, cut and fill, construction, etc. will be of great concern to the natural environment. Again, it is easy to type out a range of identified risks, outline their concern and then state they will address it later. How are we to determine the full extent of each issue if the Proponent does not place full detail in a plan on how they are going to manage it. Much like the Proponent relying on “screening” for visual disturbance or noise blocking. Where is the analysis of this being a solution? What holds the Proponent to account after the approval process has been initiated?

SUMMARY

The Proponent has a lot of concerns to detail in the EIS but they’ve simply skimmed the surface and provided technical details that the majority of the community may not understand but it looks so important they must know what they’re doing? Unfortunately, my firm belief is they are gaming the system. Providing enough to show some understanding but how can they prove they can undertake all that they have stated? Where is their referral for having project managed a project of this size and scope? What experience do they have apart from designing and manufacturing turbines? Throughout the EIS its apparent a lot of devil in the detail will be outlined after approval such as; Waste management plan, storm water management plan, bush fire management plan, traffic management plan, environmental management strategy, communication issues, surely the Proponent should have plans after having over 2 years to put the WWP in motion? If they haven’t treated the EIS with the due diligence it requires that indicates a Proponent not involved enough to warrant an approval of their proposal.

I have spent a great deal of time trying to read the EIS and how the WWP will be managed. Key concerns are identified as they would be for any generic WTG development. Noise, visual, biodiversity etc. However, there are simply too many issues to warrant the WWP. This simply shows the development is not suitable to this area. The removal of habitat and consequent mitigation is not a solution. Paying offsets is not a solution. We must protect the environment

and in particular this region from such disruption. The Proponent has not done an economic analysis on the impact this will have on tourism and business in town. It simply states this is beneficial for the town. How? Show actual figures to determine a cost benefit analysis. From the perspective of Arran Park, this project is a major issue financially. Future plans for the property will be thwarted and business plan for such will not be applicable as the WTG's will have a major impact on tourism prospects in the future. The Proponent relies on the unknown when it comes to impacts on property values. Agricultural land can run in conjunction with WTG's. That may well be the case but commercial agricultural ventures are ions apart from Farm Stay, B & B's and the like which rely on the natural environment to attract visitors. Some people believe Wind Turbines are attractive and add to the landscape – this is entirely subjective. Where is a large peer reviewed study on this with relation to the newer, more imposing 230m tall WTG's? Where are the tourist traps alongside WTG's in other developments in regional NSW? Has there been a study on the impacts on small towns regarding this issue?

“For the wind energy industry, the findings are particularly significant. As a green industry, whose credentials rest on its generation of pollution-free and greenhouse-friendly electricity, it is particularly critical that the industry not cause environmental impacts. The findings of this study suggest that it should avoid the selection of sites which, although having excellent wind resources, are also of high scenic value to the community.” (Wind Energy Industry's Responsibility for Visual Impact: a Study of the Visual Effects of Wind Farms in South Australia)

Of great interest to me with this statement is the Green Industry must not cause environmental impacts. Throughout the EIS is a slew of impacts in which the Proponent seeks to mitigate and offset rather than remove or reduce. Visual amenity is underplayed and standards produced with relation to visual assessment are underhandedly taken to reduce visual impact by not representing the entire site objectively. Taking a photo behind a tree is not conducive to obtaining community participation in the project and certainly not Primary Stakeholders such as Arran Park.

Not assessing financial impacts on the town and non-involved landholders or acknowledging their concerns with relation to various impacts on their properties and the community. The Proponent has not consulted in any detail with concerned non-involved neighbours. The community engagement has been severely lacking with the Proponent consulting more with involved participants than non-involved. On Table 6-69 Impact Issues, Project Neighbours “Establishment of the Neighbour Benefit Program” is misleading. Their new policy being a community fund being established shouldn't be made up of round figures as stated but rather in reflection of how the Proponent should be compensating businesses in the town that will be affected financially by establishing some independent review on exactly how much it will cost non-involved landholders and businesses in town. There are actual livelihoods at stake but no detailed review of exactly how this will impact financially has been conducted outside of the Proponent stating its great for the town!

The impacts identified to this cohort are extensive; Adequacy and transparency or stakeholder engagement, disruption to farming practices, road safety impacts, interruptions to daily life, construction amenity impacts, impacts on land use and values, perceived health impacts, visual amenity impacts, cumulative impacts with additional projects. No mention of mitigation other than the creation of a nonexistent benefit program. No mention of environmental impacts, impacts on tourism, impacts on biodiversity, impacts on future earnings and potential Bushfire risks. No, the Proponent believes the Bush Fire issue is positive as they are clearing land and providing new access tracks that the RFS may potentially use in future.

CONCLUSION

The WWP should not be approved. This area is not suitable and the impacts too great to a large proportion of the community with benefits not outweighing the potential environmental costs. The NEREZ should never have included the Walcha Plateau being at the beginning of the Bio Region corridor that extends up the Great Dividing Range north through heritage listed zones. The Proponent has not proven themselves to be a suitable Developer having ruined their own reputation via their conduct within the community. Their claim to have sufficiently engaged with the community is hopefully proven to be woefully inadequate by other submissions the Department will receive. Perhaps I am wrong but their conduct with our family and our situation has left a lot to be desired. If the WWP were to proceed it will have significant costs to us personally both throughout construction and during operation over the predicted next 30 years.

If the Department would like to send delegates to the area to assess the WWP, please feel free to visit Arran Park. In addition, if the Department would like further photographs I would be happy to provide them (visual amenity, birdlife etc). Any further questions again, I would be happy for you to contact me directly.

Yours sincerely,
Rebecca