



Dear Minister

23 January 2023

Re Winterbourne Wind - SSD-10471

We wish on behalf of our Members to formally lodge an objection to the above project. The Project clearly conflicts with our Responsible Development Protocols.

It is irresponsible in its abject failure to allow our Community Members to properly assess the impacts. The Developer seems to be deliberately putting a development proposition on **the table of assessment** which is half baked in terms of project detail and obvious errors. Many critical management plans required for the Community to assess the project impacts are referenced by the Developer as “on their to-do list” as This seems to be in total contravention with the **Environmental Planning Act 1979 Regulation 2** (‘Planning Act’) as to form and substance and accuracy. It seems to make a mockery of your SSD Assessment Guidelines 2021 amendments, regarding REAP Declarations as to ‘no misleading information’. We would ask that the Developer and their Consultants be held to account for this indiscretion. It is not the Community’s job to point out the many flaws and missing information.

It is patently obvious that the Developer is using the ‘tick the box’ SSD Pathway to the advantage of their commercial ambitions. Just ‘Tick the Boxes’ in accordance with the Planning Act process – lightly will do. **The EIS should be rejected in its entirety** as flawed, frivolous and failing to meet the even the lowest bar in the Planning Regime.

There are **three obvious** reasons why this project is **nonsensical in a strategic landuse planning sense**;

- Project Location It is **not responsible development** to propose a project on top of a World Heritage Asset – endangering unique biodiversity –eroding public interest and reducing public enjoyment of some of Australia’s pristine wilderness. It is unfathomable, even inconceivable that the Developer’s Danish Government would consider to endorse such a development, if it were on top of one of their National Park Treasures.
- It is **not responsible development** to propose a project of this magnitude on a small rural community. It **cannot be absorbed visually** – the proposed turbines are monstrous 230m x 6.2MW offshore equipment, which have not yet be deployed onshore. The physical intrusion is obvious – the number of turbines is totally excessive.
- It **not responsible development**. – It is **totally irresponsible** to propose a development of this magnitude without robust contemplation of Cumulative Impacts. By robust we mean a study area which gives some credibility to the Government’s **Cumulative Impact Assessment Guidelines** -so proposing the whole of the New England is a nonsense – except for Traffic (see hereunder). The Developer’s deliberate **failure to include the extremely foreseeable Ruby Hills Wind Farm Proposal is an attempt to denigrate and devalue the Department’s Guidelines**. As is the failure to contemplate Brackendale ,Salisbury Solar and Wind and Bendemeer Solar and Wind.

Strategic Land Use Planning is an issue that matters and is one which ReD4NE has hammered constantly with the Government and Developers. **Strategic Landuse Planning underlines our commitment to seek a more just 3 GW target.**

Related to the Cumulative Impact point well made above is the absolute concern as to the Road and Traffic Impacts on not only the Walcha Community but also the New England more generally.

- **For the Walcha Community** the forecast congestion, the forecast damage to road and the potential damage to life and limb – particularly school children is incomprehensible. **To wrap this outlook in a very poorly error ridden report is disgraceful, disrespectful and totally unprofessional.**
- Notwithstanding the dour and unacceptable Roads and Traffic outlook for the Walcha Community – the Developer offers no assessment of the obvious **impact for the Greater New England** – for these developments there is only one way in and one way out. For The New England – the potential impacts of this project are staggering and enduring, potentially for years to come.

It is obvious that the Developer needs to fund up a more professional independent study of not only the impact on the Community of Walcha but also of the whole of the New England as a minimum standard. All Originators and Current Developers in the REZ should contribute to ensure professional robustness and independence of such a study.

Project Development should be placed in a moratorium pending completeness of such a report.

It is ReD4NE's observation that this Project has set a new low benchmark for **paucity of community consultation**.

- Most Developers pay lip service to **the Government's Community Participation Principle**. This Developer offers a recitation of poorly supported drop - in style events supported by Host and Host's Families but demonstrably **under supported by the wider community**.
- Secondly the disrespect afforded the Walcha Indigenous Community -Dunghatti Traditional owners is not short of disrespectful. The Developer's efforts should be showcased as basic 'blackwashing' in keeping with their timetable to 'pump and dump' the project in favour of turbine sales. No winners here for their international ESG reputation. **Their ACHAR should be returned with a big "F" for fail.**

The Project presents a litany of lamentable assessments meant to distort – none more serious than Noise. We see this time and again with Wind Farm Developments. It is obvious that the Developer on this occasion followed the same old two card trick – **pump up** the background noise through dubious deceitful methodologies and **pump down** the predicted noise levels. Unfortunately, **Peer Review** confirms on this occasions a **potential 15dB shortfall** – leaving many residences exposed to above compliance noise levels. On this issue alone the projects presents an **"F"** for fail and a big **"I"** for irresponsible.

ReD4NE could continue – however we would be repeating the message I am sure is being amplified again and again – **this project is poorly conceived -and even more poorly developed – it has zero social licence**

ReD4NE Office Bearers, on behalf of ReD4NE Members

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