27 October, 2023

NSW Department of Planning and Environment Major Projects Locked Bag 5022 Parramatta NSW 2124

RE: Paling Yards Wind Farm SSD - 29064077

I Jaclyn Burns object to the Paling Yard Wind Farm, as proposed by State Significant Development SSD – 29064077, for the following reasons:.

Heritage Assessment:

O'Connell has historical, historical association, aesthetic, technical, social and rarity values. It is of high local significance with aspects of state level significance.

The approach to the village from the north is of particular significance with the picturesque rural vista from Cox's Hill, the crossing of the Fish River and the passage through the Memorial Avenue of trees.

The strength of attachment to the early settlement of O'Connell by the local community is evident in the recent issues relating to the conservation of the Memorial Avenue of trees and the presentation, care and maintenance of the buildings in the village. The establishment of a community groups, such as the O'Connell Valley Landscape Conservation Group in the 2000s and the O'Connell Village Preservation Group in the 1990s further reinforces this importance that sectors of the community have for O'Connell.

The approximately 900-meter long living memorial of 120 desert ash trees along O'Connell Road was established to honour the soldiers from O'Connell who served in the first world war. It begins at the Beaconsfield Road junction and makes it way past the Catholic Church and down to the O'Connell Hotel. The Memorial Avenue connects the various groups of buildings within the O'Connell Settlement and is a key feature of the cultural landscape.

After World War One, the people of O'Connell planted 120 Desert Ash Trees (Fraxinus Ornus) in the village along O'Connell Road to commemorate the men and women of the O'Connell District who fought and lost their lives in World War One (O'Connell Village Preservation Group, 1997). This is now known as the Memorial Avenue. This species was believed to have been chosen as they were most likely the trees growing in and around the battlefields (O'Connell Village Preservation Group, 1997). Several fundraising events such as Memorial Avenue dances were held for most of 1925 to raise money to purchase the trees. The women planned the dances and provided lunch whereas the men cut and carted the poles to be used as tree guards (O'Connell Village Preservation Group, 1997). Men and equipment to grade the road and prepare for planting was provided by Oberon Council. The eastern side of the avenue had been planted by the end of 1925 and money had been raised to plant the western side too (O'Connell Village

Preservation Group, 1997). It is believed that the avenue, completed in 1927, was originally two miles long and extended all the way to the Fish River (O'Connell Village Preservation Group, 1997).

An inspection of the trees by University of Sydney students Candace Bower, Neelam Pradhananga and Tristan Ryan as part of ARCH 9028 Conservation Methods and Practices, concludes that a visual inspection of the Memorial Avenue of Trees indicates that some trees are in poor condition with damaged branches caused primarily by the trucks that pass-through O'Connell Road, and some trees have apparently failed and been replaced. As a whole, the avenue is in a fair condition and grades the Memorial Avenue as "*Rare or outstanding element directly contributing to an item's local and state significance.*" It is also states that the Memorial Avenue of trees is under constant threat due to damage caused by passing traffic.

The proposed development represents unacceptable risks to the O'Connell Memorial Avenue of Trees, an item of heritage and cultural significance for our community. This issue is not new, and the proponent was made aware of the potential impacts to the Memorial Avenue from the transportation of the Wind Farm components during the 2022 community workshop, and yet this issue has still not been addressed from a heritage or transport perspective.

Clause 5.10(2) of the Oberon Local Environmental Plan, 2013 states:

"Development consent is required for any of the following:

(a) demolishing or moving any of the following or altering the exterior of any of the following

(including, in the case of a building, making changes to its detail, fabric, finish or appearance):

(i) a heritage item,

(ii) an Aboriginal object,

(iii) a building, work, relic or tree within a heritage conservation area,"

The Heritage assessment provided with the EIS, fails to acknowledge or consider any proposed impacts to the Memorial Avenue with thin the O'Connell Urban Conservation Area.

The Environmental Impact Statement (EIS) presented in support of the development is not rigorous in the assessment of impacts resulting from the transportation of the wind tower components through the O'Connell Valley and in particular the physical impacts on the Memorial Avene of Desert Ash Trees or the Heritage impacts of undertaking works within a Heritage Conservation Area. A copy of this submission will be forwarded to the NSW Heritage Office to ensure this issue is adequately considered.

Transport Route Assessment:

The Transport Route assessment is vague in its interpretation of the potential impacts upon the Memorial Avenue of Trees, and states:

"The remaining route up until the turnoff onto O'Connell Road is clear of vegetation. All roads from this point through to site will need to be checked for a clear passage of at least 5.3 metres for overhead branches. <u>Some trimming/removal is likely</u> from this point onwards. <u>There is a section of road just before O'Connell that is of particular concern</u>". A detailed assessment of the potential impacts to the Memorial Avenue of Trees needs to be fully considered and the Transport Route Assessment amended. The extent of works required to transport the tower components through O'Connell appears to be deliberately vague.

The "trimming of branches" cannot occur with out full assessment from a qualified arborist and Heritage architect and the extent of "works" proposed presented to the community for consideration. The cathedral effect formed by the overhanging branches is a significant part of the aesthetic created by the Avenue. No trees should be allowed to be removed and any trimming cannot be to the detriment of the trees or the aesthetic of the Avenue.

Social and economic impact:

A full assessment has not been made of the potential traffic impacts of the project on the road network associated to O'Connell Road as it dissects the Urban Conservation area as well as the function and financial disruption to existing shops (Café and local Pub), residential and commercial site access arrangements and road safety, including school bus routes, pick up/drop off zones.

Yours sincerely Jaclyn Burns Burns Planning and Development 151 Burns Road WISEMANS CREEK NSW 2795 m: 0467 597713