

OBJECTION to Burrendong Wind Project (SSD-8950984)

I wholeheartedly object to Ark Energy's proposed Burrendong Wind project.

As a fifth generation farmer I am concerned for the rural and regional communities and the Australian agricultural industry with regard to the 'rapid transition to renewables'. This transition has the potential to take thousands of hectares of land out of food and fibre production (killing small farming communities), and if it is carried out 'rapidly', due diligence and sensibility may be lost and cause devastating impacts amongst the effected communities.

My family has been farming in the Dunedoo district for more than 200 years. In my opinion, if our businesses were not 'sustainable' we would not still be here. Why then, is some of the most productive land in the state, and country, being used as 'the renewable power plant of the future'?

Impacts on Agriculture

The New South Wales Government declared the five current Renewable Energy Zones without consulting the rural and regional communities most affected. The Central West Orana Renewable Energy Zone (CWO REZ) covers 20,944 square kilometres, the majority of which is used for agriculture. Whilst not all of this land is considered valuable it all plays its part in producing the food and fibre our state, and country, needs to continue providing for its people. How is the agriculture industry meant to increase food production for the growing Australian population if land is taken out of service to cater for renewable energy projects?

The Burrendong Wind project EIS states, "in addition to supporting NSW State Policy directions and national grid supply benefits, the Project will deliver the following key Statewide economic benefits: support for ongoing industry transition in Regional NSW from agriculture, mining, etc to renewable energy." Again, how will farmers feed a growing population if we are to 'transition from agriculture to renewable energy'? Ark Energy are suggesting the two cannot coinhabit!

The Uungula Wind EIS Main Report states "the Central West Orana regional economy has historically been based on agriculture, and it remains one of the most productive agricultural areas in Australia (DPE, 2017). The region features good access to water, high quality soils and suitable climates for a wide range of agricultural pursuits, including broad acre cropping, meat and wool production and forestry. While the total area of land available for agriculture in Australia is large, comparatively few locations have access to all these characteristics." There are millions of hectares of agricultural land in NSW, but certain areas are conducive to much more intensive production; including, but not limited to the Central West and Orana Regions. How then, are we considering taking so much of this area out of production throughout both construction and operation phases of renewable energy projects?

Traffic & Transport

The transport route for the oversize, overmass (OSOM) components of the wind turbines is said to be from the Port of Newcastle to the project site. The Golden Highway is the funnel from all of western NSW to Port and return; making this highway a carpark (considering the cumulative effect of all the proposed CWO REZ projects) will not only frustrate travellers but have major impacts on all agricultural businesses in the district and state. The EIS states that "police (will be) required to stop eastbound traffic on (the) Golden Highway to allow OSOM vehicles to travel onto (the) incorrect side of the road for approximately 400m on several corners." These delays will most probably lead to road users making rash and dangerous decisions. How many fatal road accidents will be attributed to the 'rapid transition to renewables'? How many is too many? There will need to be extensive upgrades carried out on the Golden Highway, including but not limited to overtaking lanes, road widening, Denman Bridge replacement, pavement upgrades and turning lanes prior to any more development consent in the CWO REZ.

My property is split by the Golden Highway, where it is a double highway (Castlereagh Highway). We regularly walk sheep and cattle across the road but already have issues stopping the traffic to do so.

What measures will Ark Energy, in conjunction with other developers, put in place to help me and other farmers in the same situation, get our livestock across the Golden Highway, and other transport routes safely?

How does Ark Energy proposed to maintain the safety of community members on local roads considering the major increase in traffic volumes?

I understand current Ark Energy contractors and employees are using Wallawaugh Road as access to the project site. This road is not proposed to be used for access so that should not be happening. Ark Energy staff should only be using proposed routes, otherwise there should be maintenance done on any other roads at the proponents cost.

Saxa Road, part of the OSOM transport route, has been closed to all except local traffic since October 2022. How does Ark Energy propose to use this road as a major transport route?

Bushfire Risk

Appendix M – Bushfire Risk Assessment states in that “overall, the potential risk of bushfires impacting on the WTGs is considered to be low given their robust construction (CFS 2016), provision of APZ, lower likelihood of impact from large bushfire and firefighter resources in the broader locality.” Local fire fighting resources (Rural Fire Service – RFS) should not be used to protect the Burrendong Wind project; instead Ark Energy should be providing resources to protect the surrounding farmland. Rural areas are already struggling to maintain volunteer services due to our aging and decreasing populations. Ark Energy should also not be relying upon Fire and Rescue NSW as this is a resource for the rural and regional population and was not designed to protect major assets like large scale wind and solar projects in inaccessible areas. In response to regional and rural NSW hosting renewable energy projects there should be benefits, like more fire fighting equipment and personnel, not more work for our communities! Ark Energy’s construction and operational staff should have access to adequate equipment (at least two fire trucks - equivalent to category 1 RFS units) and be trained in their use to both protect the project site and the greater district.

During the Sir Ivan Bushfire, in the Dunedoo & Coolah district in 2017, aerial fire fighting assets were used with great success. There were countless homes and livelihoods saved by both fixed wing aircraft and helicopters. How will these operations be carried out effectively, in attempt to save agricultural land, livestock and residences within the project area and surrounds? I don’t imagine there would be a lot of pilots willing to further risk their lives by flying in an area with wind turbines and transmission lines. It will only take one accident to put a stop to any aerial fire fighting assistance within the CWO REZ leaving our communities and farmers very vulnerable. Ark Energy, and all renewable energy proponents, should be required to contact the local RFS brigades, and the closest fire control centres as part of their assessment so the information they are given is location specific, rather than the broader information that is given by RFS head office.

Following a major fire event it is the local community left to ‘clean up the mess’. Many people have helped bury dead livestock, euthanise those too badly burnt to be saved, fixed and/or replaced fences, demolished and rebuilt farm infrastructure, transported livestock to areas with feed or donated fodder after fires have occurred. How will Ark Energy help the community surrounding the project area if there happens to be a major fire event?

Visual & Noise Impacts

Most people who choose to live in rural areas do so for the peace and quiet and the scenic landscapes. The potential visual and noise impacts both during construction and operation are in huge contrast to what rural and regional community members are accustomed to.

Bodangora Wind consists of 150 metre high turbines which are visible from north of Dunedoo, more than 50km away. Whilst this may not be considered visual impact to some people, namely those from metropolitan areas, the vast proportion of rural and regional people are not used to an industrial landscape, nor do they want to become accustomed to such views.

It is proposed that any residences with high visual impacts will have screen planting undertaken 'post construction' to reduce the visibility of nearby turbines. Eucalypts, like those shown in the photomontages, take approximately 20 years to get to the size they are depicted. Will established trees be planted to accelerate the screening benefits? Will Ark Energy care for (water and replace if need be) screen plantings? Keeping young trees alive is very difficult during drought conditions and if established trees are planted they are even harder to care for. This should not be the responsibility of landowners. The acceptable level of shadow flicker is said to be 30 hours per year. How would any of the DPE or Ark Energy staff feel if their residence was subjected to that number of hours of shadow flicker? What about residents who may have epilepsy or chronic migraines? It is not acceptable that anyone should have to endure this burden for any amount of time.

It is stated that there is potential for blade glint to occur. Modern WTG's **are often** constructed with low reflectivity surface treatments to reduce the effect of glint. Will the turbines installed at the Burrendong Wind project be treated so they are less reflective?

The EIS Executive Summary states "the project is in a predominantly agricultural area with a low population density within and surrounding the project. Therefore, there are limited visual and noise impacts associated with the project." While there may not be a huge population affected by visual or noise impacts that should not diminish their importance. Visual impacts are subjective; the level of significance of such effects should not be made by only someone who does not live on the property, it should be a collaborative approach between those preparing assessments and the landowner.

At the meeting in Mudgee on Friday December 8th Andrew Wilson, General Manager Development NSW, Ark Energy, stated that this project should be relatively easy to get past DPE in regard to visual amenity. In my opinion that is a very inappropriate statement, especially from an employee of the proponent.

Water

Appendix Q – Surface Water Impact Assessment states "the water required for dust suppression will need to be sourced from an appropriate location with the relevant licences. Sources of water nearby are the Macquarie River, Cudgegong River, Burrendong Dam and catchment farm dams (used for stock). Some water may be able to be sourced from the farm dams, but the volume of water required will exceed the water availability from this source. Therefore, water will need to be sourced from the other nearby options or alternative water sources (with relevant licences)."

Water is one of the most important resources in rural and regional areas. The cumulative impact on the CWO REZ's water sources will be major and possibly devastating for the whole district. Stock and domestic water has priority; how does Ark Energy plan to manage water use if the construction timeline happens to coincide with a dry period? Can Ark Energy assure the community in the surrounding area of the project they will not have any restrictions placed on their water use due to the projects' construction?

Due to the importance of water resources to the local community I believe it is necessary for the community to be given the opportunity to provide feedback when Ark Energy has found what they consider a viable water source.

Waste

There is no availability for waste at any local council facilities. Where is Ark Energy proposing to dispose of any project and worker accommodation waste?

The EIS states operation of the wind project is expected to be 30 years. How many parts (ie. blades) are generally replaced in this time? And, how will any waste be disposed of? Are those vehicle movements allowed for in the EIS?

Environmental Impacts

The Executive Summary states that "the project has the potential to have a significant impact on Commonwealth listed threatened species and ecological communities," and "the construction of WTG's

has the potential to impact aquatic ecosystems both directly and indirectly.” For any project other than renewable energy the risks to animal species and habitat are taken very seriously and often mean the rejection of development. Why is it that renewable energy projects are being approved with biodiversity offsets instead of being rejected due to possible impacts? The potential effects of not only the Burrendong Wind project on native animals (Burrendong being an Aboriginal word for koala) and habitat but the cumulative effects of all of the projects proposed and operating in the CWO REZ and greater NSW and Australia will be devastating to our flora and fauna. Even one koala, or other native animal, death from this project is too many and should not be tolerated.

The NSW Department of Planning and Environment website states that “the Biodiversity Offset Scheme is the framework for offsetting unavoidable impacts on biodiversity from development with biodiversity gains through landholder stewardship agreements”. I cannot understand how it is acceptable to impact certain areas of habitat or flora and fauna colonies as long as there is similar ‘bought’ to offset the losses. It is also a well known fact that a lot of country that is ‘locked up’ for environmental reasons becomes a harbour for noxious weeds and feral animals, not unlike National Parks. In my opinion, removing fully grown trees without first ‘replacing’ them elsewhere is not good enough. How is Ark Energy going to manage any land that will be used to ‘offset’ the environmental impacts of the Burrendong Wind project? And how many trees will Ark Energy plant, and where, to replace those they will remove?

Will the debris from trees felled to create roads be removed from the site? How will erosion be managed on aforementioned roads straight after construction?

Workforce & Accommodation

At the information session held by Ark Energy on the 8th December 2023 I asked questions around the peak workforce and the workers accommodation strategy. Not one of the four Ark Energy employees in the room could supply the peak workforce figure off the top of their head and I was told it is not yet known where the workforce will be housed.

The EIS states peak workforce is expected to be 375. There are projects in and surrounding the CWO REZ that are already struggling to find enough workers to fill construction positions. How does Ark Energy propose to find 375 workers to construct the Burrendong Wind project especially if there are other projects in the CWO REZ under construction concurrently? What will Ark Energy do to ensure their project does not have a negative effect on the ability for local landowners to find employees?

Biosecurity Risk

There are numerous properties and neighbours involved in this project. How will Ark Energy ensure that no weeds or animal diseases are spread from property to property? How will any procedures undertaken be policed during construction? Already the local community has had too bigger burden placed on it in regard to this project proposal; it should not be left up to them to police any constraints put on the proponent. There should be a dedicated team onsite every day of construction to ensure compliance.

Detailed Design

There are multiple instances in the EIS that states elements of the project will be confirmed during the detailed design process which is to be undertaken post development consent. It is not acceptable that the wider community does not get a chance to scrutinise all detailed design or that detailed design should be undertaken post development consent. Examples of detailed design not included in the EIS are final WTG layouts, infrastructure and elements to be installed or constructed (eg. WTG), the final number and location of telecommunications facilities, road crossings of waterways, port of entry, traffic routes and Biodiversity Offset Strategy (BOS). It is not fair that the public will not get to comment on these final details.

Homes Powered

Advertising material for the Burrendong Wind claims the project is expected to deliver enough renewable energy to power around 247,000 homes across New South Wales. How is this figure calculated? Considering the wind does not blow 24 hours a day, 7 days a week, is the power to 247,000 homes meant to be constant or only when the project is working at capacity?

Local Council

The proposed Burrendong Wind project is located within both Dubbo Regional Council and Mid Western Regional Council, which means that their Local Environment Plans (LEP's) must be considered. The project is on land zoned as RU1 (Primary Production) and adjacent to land zoned RU3 (Forestry) which prohibits wind energy systems being placed in the RU1 zone. The State Environmental Planning Policy (Transport and Infrastructure) states that development for the purpose of electricity generating works may be carried out by any person with consent on any land in a prescribed rural, industrial, or special use zone. Why do LGA's bother having LEP's if the SEPP can override it without consent of the council, or for that matter the affected communities? How can LGA's advocate for the best for their constituents and environment if the state government can simply override their plans without any local knowledge?

Exhibition period

The minimum 28 day exhibition period for SSD projects is not long enough for community to adequately read and respond to such large documents. The Burrendong Wind project EIS main document is over 500 pages and all documents total nearly 2200 pages. There are a huge number of projects currently going through the planning process in the CWO REZ; it is too much! Proponents engage experts to complete assessments; how is it fair that we, small rural farming communities, are expected to interpret such reports?

It would be a show of good faith to rural and regional communities if developers would work with the Department of Planning and Environment to extend these exhibitions to 90 days minimum. If these projects are to go ahead it should only be with understanding between local communities and the proponent so the impacts are lessened.

Cumulative Impacts

There are only 14 projects listed in the Appendix P – Agricultural Impact Assessment but there are nearly 50 in the CWO REZ that I am aware of. The same paper states, "it is expected that cumulative impacts from traffic volumes will be minimal given most projects identified have already been completed." The cumulative traffic and transport impacts will be enormous when you consider most of the proposed projects have the same transport route from the Port of Newcastle, along the Golden Highway. Every OSOM load I am aware of will travel through the main street of Merriwa, and a lot through the main street of Dunedoo. How are these small towns expected to cope with that influx? Will our citizens feel safe parking in, or crossing the main streets of Dunedoo or Merriwa?

There are also major cumulative effects on workforce, workers accommodation, water, waste, biosecurity risks, environmental impacts, noise, visual amenity, bushfire risk and agriculture. These are all things very important to rural and regional NSW, and Australia, but are being overlooked due to the need to reach the 'green' energy targets our Government has signed us up for and appease the ideals of metropolitan citizens.

Conclusion

Inhabitants of the CWO REZ have been bombarded with scoping reports, EIS exhibitions and other documents (eg. Draft Energy Policy Framework), especially within the last six months. We are tired, frustrated, disillusioned and devastated because we have been deceived and unenlightened about so many aspects of transmission, wind and solar projects. The behaviour shown by EnergyCo and other developers toward landowners and rural and regional communities has been nothing short of

disgusting. There is not one place to find the unedited cumulative effects of all of the projects operating and proposed in the CWO REZ because the potential impacts are phenomenal, and such information will make that obvious to the general population.

Personally, I would hate to calculate the amount of time I have spent researching relevant guidelines, legislation, project documents, and trying to educate the broader public about the possible impacts. I am a farmer, and whilst I am doing all of this office work things are not happening on my property that should be. We, as farmers, are expected to keep feeding Australia's growing population, but no more land can be formed so how are we going to keep up?

The undue stress and angst the whole CWO REZ is causing landowners and rural and regional communities is immense and unnecessary. The risk to mental health of our communities is colossal. If there was adequate early consultation with affected communities the situation may have been lot different. What mental health toll is too much? One death due to the CWO REZ is too many!

As previously mentioned, I attended an information session held by Ark Energy at Parklands Resort, Mudgee on 8th December 2023. In my opinion there were no adequate answers, from any of the four employees in attendance, to questions asked by community members. I personally asked questions regarding workforce and accommodation, bushfire risk and fire fighting restrictions, transport routes, number of OSOM loads per turbine and not one question was answered sufficiently (some answers were found by employees in the EIS). This is not acceptable!

Ark Energy should be forced to go back to the drawing board and achieve a better understanding of the proposed project and its potential impacts on the surrounding community and agricultural land before it is considered by the Department of Planning and Environment. This sort of rushed and inadequate planning and assessment is, in my opinion, an example of the pitfalls of the 'rapid transition to renewables', and proof there needs to be more investigation conducted before any more large scale wind, solar or transmission projects are approved.

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