

# **Responsible Energy Development for New England (ReD4NE)**

**Group Submission:**

## **Winterbourne Wind EIS Amendment Report**

### **Community's Objection ReD4NE**

ReD4NE expresses several critical concerns regarding the Winterbourne Wind Farm (WWF) project, emphasizing issues related to the developer's credibility, economic viability, community impact, and adherence to regulatory standards.

#### **1. Developer's Inadequacies**

Vestas, the wind turbine manufacturer behind WWF, has failed to convincingly argue for project approval, even after five extensions to respond to submissions. Despite superficial claims of "reconfiguration" and minimized impact, the project remains fundamentally unchanged, merely repositioning turbines within the same area. The amendments seem aimed at marketing the project rather than addressing genuine community or environmental concerns. At a public event, Vestas provided no substantial justification for these changes, indicating a lack of meaningful consultation or environmental consideration.

#### **2. Questionable Financial Stability**

Vestas' financial struggles and the challenging economics of wind energy cast doubt on the project's feasibility. The company's reported operating losses and the rising costs of turbine installation suggest significant economic pressure. Critics argue that Vestas may be incentivized to cut corners or rush approvals, undermining the project's integrity. Given this financial backdrop, ReD4NE questions whether WWF is a sound investment of public resources, especially given the high subsidies involved.

#### **3. Economic and Community Impact**

The local community is unconvinced by the project's promises of economic benefits. The projected cost of construction is immense, and it's unclear how it would reduce energy prices in New South Wales. The community also sees little long-term economic gain, with only temporary job opportunities likely to benefit a workforce already at full employment. Concerns are further raised over the developer's extended construction timeline and lack of commitment to financial agreements, such as a Voluntary Planning Agreement (VPA). Moreover, landholders face long-term contracts with unclear benefits.

#### **4. Growing Community Opposition**

Public sentiment has shifted even more strongly against the project, with a significant proportion of residents now opposed. Many of the supportive submissions were solicited from people without a clear understanding of the project or its local impact. In reality, the vast majority of nearby residents objected, and many of the remaining supporters had a financial stake in the development.

#### **5. Regulatory and Legal Shortcomings**

ReD4NE argues that the developer has not complied with procedural fairness and planning guidelines, ignoring critical legal and environmental standards. The Environmental Impact

Statement (EIS) was incomplete, contained errors, and lacked the necessary technical detail to meet regulatory expectations. The group highlights key legal issues, including threats to biodiversity and non-compliance with environmental laws, which they believe should lead to the project's rejection.

Overall, ReD4NE contends that the Winterbourne Wind Farm project fails to justify its impact on the environment and community, urging authorities to withhold consent based on these significant concerns.

### **Procedural Fairness Concerns Raised by ReD4NE**

ReD4NE questions the procedural fairness of the Environmental Impact Statement (EIS) process, emphasizing that the community was disadvantaged in evaluating the merits of the Winterbourne Wind Farm project. The group argues that the EIS should have been of high technical quality, as required by Planning Guidelines, but instead was poorly prepared and incomplete. Many community submissions highlighted these deficiencies, suggesting that the developer may have intentionally submitted an unfinished EIS to reduce costs or expedite approvals.

This approach placed the burden on the community to point out missing assessments and merit impacts, while the developer later addressed these gaps in a more streamlined, cost-effective manner. ReD4NE views this as a shortcut that allowed Vestas to manage its permitting delays, denying the community critical information necessary for a thorough and fair evaluation. Despite raising concerns, the community has not received adequate responses or feedback.

Additionally, since the closing of community submissions in January 2023, the developer was granted five extensions to respond, eventually delivering a 1,050-page report with amendments only in September 2024. ReD4NE argues that expecting the community to review and respond to this extensive documentation within just 28 days is unreasonable and unfair. They characterize the process as either incompetently managed or deliberately biased against community interests.

### **ReD4NE Suggested Project Amendments**

ReD4NE expresses concerns about the Winterbourne Wind Farm project, arguing that the developer, more interested in selling the development rights than seeing the project through, has left the community to address a proposal lacking in several areas of public interest. The project is criticized for significant shortcomings in Traffic and Transport, Biodiversity, Visual Impact, Water and Gravel, Noise, Aboriginal Cultural Heritage (ACHAR), Social Advantage, Cumulative Impacts, and overall Community Benefits.

#### **A. ReD4NE Traffic and Transport Issues Concerns**

The community emphasizes that the initial proposal for using the Oxley Highway as a route for Over Size Over Mass (OSOM) transport was never feasible. Now, with the amended OSOM route using the New England Highway and Staces Road, along with new road connections to Thunderbolts Way, the community demands comprehensive details on these changes. There is also concern about the use of local roads, both sealed and unsealed, which could severely impact residents.

The expected traffic disruptions, especially during construction, are described as an overwhelming burden on the quality of life, safety, and day-to-day activities in Walcha and Uralla. ReD4NE recommends the following actions to address these issues:

1. The amended Traffic Impact Assessment (TIA) should be publicly exhibited for 28 days, given the significant changes from the initial plan.
2. The developer and their consultants must host a public forum to explain their updated traffic and transport assumptions.
3. Urgent briefing sessions should be organized for each local council, especially since Walcha Shire Council has not been updated since March 2024 and Uralla Shire Council was only briefed as recently as September 2024.

## B. ReD4NE Biodiversity Concerns

ReD4NE outlines substantial biodiversity concerns related to the Winterbourne Wind Farm project, highlighting issues with the transparency, justification, and validation of the proposed reconfigurations. The community remains unconvinced by the developer's claims and stresses the need for rigorous scrutiny.

### Key Points on Biodiversity:

1. **Reconfiguration Transparency:** The community suspects that changes, including the removal of nine parcels of land and the clustering of turbines near the North Substation and Blue Mountains Road, resulted from losing a host site. While micro-siting adjustments are common, ReD4NE insists on transparent explanations. The developer's suggestion that these changes are motivated by biodiversity, visual, noise, or cultural heritage considerations lacks validation and appears strategic, possibly to gain favor with decision-making authorities.
2. **Buffer Zone Concerns:** Moving one or two turbines to just 600 meters from the Oxley Wild Rivers National Park boundary is unacceptable. ReD4NE reiterates its strong support for a 10-kilometer no-development buffer around the park to protect this critical environment.
3. **Species Impact Skepticism:** There is ongoing doubt about the developer's revised claims of reduced impact on key species, including the New England Peppermint Grassy Woodlands, Spotted-Tail Quoll, Koala, Squirrel Glider, and Glossy Black Cockatoo. ReD4NE emphasizes the importance of adherence to federal and state biodiversity laws, particularly under the EPBC Act 1999.
4. **Bird and Bat Surveys:** The community emphasizes its initial concerns about bird strikes and the lack of comprehensive surveys. The developer's responses have been inadequate, leaving major discrepancies between risk assessments unresolved. ReD4NE insists on complete and thorough survey data.
5. **Developer Accountability:** Given the location of 118 massive wind turbines adjacent to a national park and world heritage site, the developer should expect the community and the broader public to hold them accountable to the highest environmental standards under relevant biodiversity and conservation laws.
6. **Clarity on Turbine Relocations:** The community demands specific details on the impacts each relocated or refined turbine is meant to mitigate. It remains unclear whether these changes aim to reduce biodiversity harm or simply improve constructability. This ambiguity undermines the credibility of the developer's environmental impact claims.

ReD4NE urges a rigorous review to ensure all biodiversity concerns are transparently addressed and legally compliant.

## C. ReD4NE Visual Impact Concerns

ReD4NE strongly contests the developer's claims that amendments to the turbine configuration and siting reduce visual impact. The community argues that the "bunching" of turbines increases the visual burden rather than alleviating it.

**Key Points on Visual Impact:**

1. **Increased Visual Magnitude:** ReD4NE disputes the assertion that the removal of turbines B024 and B123, along with the relocation of 230-meter turbines (B024, B025, B026, B027) closer to Walcha, decreases visual impact. The claim that moving these turbines, potentially from Yalgoo, mitigates visual intrusion is deemed nonsensical.
2. **Inclusion of Associated Dwellings:** The developer's suggestion that incorporating associated dwellings (SR087, SR088, SR274, and SR282) reduces visual impact is dismissed as implausible. ReD4NE emphasizes that such measures do not diminish the visibility or presence of the massive turbines.
3. **Significant Landscape Change:** Despite the developer's use of technical jargon, such as "zones of visual influence" and other wind turbine assessment tools, ReD4NE maintains that the visual impact on the landscape will be profound and irreversible. The amendments fail to provide any genuine reassurance and seem to be attempts to obscure the project's true visual effects.
4. **Commitment to Landscape Integrity:** ReD4NE is committed to protecting the pristine landscape and will oppose the developer's amendments, emphasizing the importance of environmental and planning regulations. The community is prepared to advocate vigorously under the EPA Act and Planning Guidelines to preserve the visual integrity of the area.

**D. ReD4NE Summary on Water and Gravel**

The Community has expressed significant concerns regarding the Developer's inadequate planning and due diligence in addressing the substantial water and gravel requirements for this project. The Developer's reliance on superficial "band aid" solutions is unacceptable.

1. **Water Supply:** The introduction of water balance models using Gold Sim software by the Developer is viewed as mere spin. The Community recognizes that the proposed quarry will not meet the demand for water, leading to a need for significant external imports. The Developer's Water Management Strategy (WMS) is perceived as unrealistic and lacking practical experience. The Community will hold the Developer accountable for compliance with Macleay River Catchment obligations and extractive licensing under the NSW POEO Act 1997. Any assessments by DPHI or references to the IPC must clearly outline these resource requirements.
2. **Gravel Supply:** The Community strongly opposes the Developer's proposal for an onsite quarry, which they deem a temporary and insufficient solution for the projected demand of 500,000 tonnes per year. The Community is aware that existing commercial quarries within a 400 km radius are already constrained in terms of resources and access.
  - o The Community asserts that the quarry cannot be treated as an amendment to the existing WWF application; it requires a separate development approval process. This proposal has not been included in the Request for SEAR, issued SEAR, or the EIS, and any potential impacts—such as visual, noise, dust, and increased traffic—will be met with strong opposition.

- Furthermore, the Community insists on reviewing detailed geological and geotechnical investigation reports to assess the viability of the proposed onsite quarry.

### **E. ReD4NE's Noise Concerns**

ReD4NE has taken significant steps to address noise concerns impacting the Walcha community's health and well-being by securing a peer review of the original Sonus Noise Assessment, conducted by L. Huson and Associates (LHA), a reputable firm within the industry.

#### **Key Findings from the Peer Review:**

1. **Underestimated Noise Impact:** The peer review revealed that the developer's interpretation of the noise impact was significantly flawed, with potential underestimations exceeding 14 dB.
2. **Additional Noise Factors Ignored:** This underestimation does not account for side effects that could elevate actual sound levels or the likelihood of penalties for tonal noise if present with the turbine operations.
3. **Consultant Guidelines:** In its defense, the developer's consultant, Sonus, referenced both the South Australian Guidelines (2009 and 2021) and the NSW 2016 Noise Bulletin, suggesting they are equivalent. However, ReD4NE questions whether the developer has finalized the project configuration and confirmed that the Vestas 162 6.2 MW turbine is indeed the selected model.
4. **Ongoing Uncertainty and Concerns:** ReD4NE has requested further clarification from LHA regarding the noise modeling, noting that Sonus's compliance predictions remain uncertain and potentially inadequate. This uncertainty is heightened by the developer's proposal for a 'bunched configuration' of turbines, which could exacerbate noise impacts due to closer spacing.
5. **Commitment to Accountability:** The community is resolute in preventing a situation where the burden of noise nuisance is transferred to future purchasers or where the Environmental Protection Authority (EPA) is forced to validate noise predictions post-construction. ReD4NE emphasizes the need to avoid repeating past mistakes, such as those experienced at Bald Hills, and the potential for class actions.

In summary, ReD4NE is advocating for a comprehensive and transparent noise assessment process to safeguard the community from adverse impacts associated with the project.

### **F. ReD4NE's ACHAR and Socio-Economic Concerns**

#### **Aboriginal Cultural Heritage Assessment (ACHAR)**

ReD4NE acknowledges the Dunghatti Community's right to express its views and concerns regarding the project. From our perspective, we can only describe the Developer's approach as one of tokenism, failing to genuinely engage with the cultural heritage significance of the area.

#### **Socio-Economic Advantage**

The promise of economic benefits from the energy transition has proven to be more political spin than reality for rural and regional communities, including Walcha. The Developer's recent amendments, rather than addressing community concerns, reflect a superficial rebranding of an Environmental Impact Statement (EIS) originally assessed by an academic unfamiliar with the



region. This has been replaced by an expensive public relations effort from ERM, which still fails to capture the true local context.

The language used by the Developer—focusing on baseline considerations, vulnerability impacts, and aspirational targets—amounts to jargon devoid of substance. Genuine engagement with the community reveals a simple aspiration: to maintain a livable and workable environment that allows families to access education, healthcare, and recreation without being hindered by turbine noise or safety concerns.

The claims regarding community cohesion are unfounded. The project's history, marked by non-disclosure agreements and a lack of transparency from Walcha Energy and Walcha Wind, has already damaged local trust and cohesion. While there may be a temporary influx of workers during the construction phase, they will not contribute to the local economy as they will not reside in Walcha long-term; most will be fly-in, fly-out (FIFO) workers who leave once construction concludes.

Moreover, the socio-economic forecast indicates that tourism revenue may decline as major transport routes, including the New England Highway and Thunderbolts Way, become congested. The presence of large wind turbines situated close to the Gondwana World Heritage Area is unlikely to attract visitors, further jeopardizing the community's economic prospects.

In conclusion, ReD4NE asserts that the project fails to deliver meaningful socio-economic benefits to Walcha and surrounding communities, and it raises serious concerns regarding cultural heritage and community engagement.

## **G. ReD4NE Cumulative Impact Concerns**

The presence of the Developer's Project Office directly across from the Walcha Energy (now Origin Energy) office raises concerns about the oversight of cumulative impacts related to multiple wind farm projects in the area, notably the Ruby Hills Wind Farm with its 146 wind turbine generators (WTGs). It is implausible to ignore the effects of these developments alongside others, such as Thunderbolts, Bendemeer, Salisbury Uralla, Hills of Gold, and EnergyCo transmission lines. Together, these projects indicate that Walcha is poised to become one of the most heavily developed renewable energy precincts in Australia, necessitating a thorough and sobering assessment of cumulative impacts.

## **H. Community Engagement and Community Benefits Fund**

ReD4NE calls into question the Developer's purported community engagement efforts, citing a superficial approach that merely ticks boxes rather than genuinely involving the community. The engagement activities, outlined in Table 3-1 of the Developer's Response, are criticized for lacking substance and failing to facilitate meaningful feedback. Events like Information Days and stalls during the Walcha Show presented the project's proposals without allowing for real dialogue or understanding.

The unmanned project office and the poorly maintained Facebook page reflect a lack of commitment to community interaction. The Developer cites the Community Benefit Fund (CBF) as a positive engagement outcome; however, the structure of this fund has remained unchanged and unresponsive to community input. Feedback from community members has indicated a lack of

consideration from Walcha Wind, which reportedly signed off on arrangements without room for community input, further alienating local voices.

The reality is that the community will not see any benefits from the CBF until the project is commissioned, with the first construction phase not expected to start until 2027 and commissioning potentially delayed until 2032. The statement from the Winterbourne Wind Team makes it clear: “The operational payments for the community benefit fund will commence when the whole wind farm has been commissioned.” This highlights a disingenuous deal orchestrated by Walcha Wind, which appears to have been negotiated without adequate consideration for the broader community’s interests. The local council’s approval, despite receiving numerous warnings from the community, further underscores the disconnect between the Developer and community stakeholders.

ReD4NE remains skeptical about the extent of genuine engagement with regulatory bodies such as the DPHI and the NSW BCS, given that the Developer has secured multiple extensions on their Response to Submissions. This pattern of behavior suggests that the Developer prioritizes negotiations with select hosts while sidelining the broader community, which has repeatedly been overlooked in favor of private agreements.

### **ReD4NE's Conclusion**

The Community is emotionally drained by the ongoing complexities surrounding this project. Key planning documents—including the Environmental Impact Statement (EIS), Response to Submissions, and Amendment Reports—are riddled with misrepresentations that may be either deliberate or negligent. These documents seem designed to create a façade of compliance, merely ticking boxes while neglecting the substantive impacts on local residents and the ecological sustainability of the area.

Our analysis reveals a lack of merit in these documents concerning the objectives of the Environmental Planning and Assessment Act 1979. This situation is worsened by a clear misuse of process, which hinders the Community’s ability to fully assess the development’s merits and impacts. The EIS, intended to be a foundational element of NSW Planning Governance, has been undermined by the Developer’s attempts to exploit the EIS process, effectively denying the Community its right to natural justice.

As reiterated in our comments, this project represents poor site selection, compromising agricultural land, road systems, and cherished biodiversity. It should be recognized for what it truly is: a sales pitch for turbines paired with an Operations and Maintenance (O&M) contract. The Developer has failed to convincingly justify this as a major amendment, instead offering a reconfigured layout that obscures the project’s superficial nature. The claims of environmental and social benefits are seen as misrepresentation and spin.

Ultimately, a critical question remains regarding public interest: the economic advantages of this project must be clearly demonstrated, yet the facts presented to the Community fail to indicate any substantial public benefit or potential to reduce energy prices.

Regards

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