

**OBJECTION TO APPLICATION NO. SSD-10471  
WINTERBOURNE WIND TURBINE DEVELOPMENT**

SR007 REPLY TO:  
**RE-EXHIBITION**  
AMENDMENT TO EIS  
AND RESPONSE TO  
SUBMISSION

**To:** Department of Planning, Housing and Infrastructure  
Kurtis Wathen  
A/Team Leader  
Energy Assessments

**RE:** 1878 WINTERBOURNE ROAD, WALCHA NSW 2354  
OBJECTION TO ALL OF THE PROPOSAL - SSD-10471

PHOTO MONTAGE 02  
Viewpoint WVPC01  
Moir Landscape  
Architecture: Dec '21  
REV A (page 5)

**Distance to Closest  
Turbine: 1.96km**

**Number of Turbines  
within 3100m: 5**

**Number of Turbines  
within 8km: 27 + 5**

**Number viewable  
within 8km: 25**

**Number viewable  
over the project:**

Quoted 3D: 23  
Quoted Map: 80-99

**Operational Noise  
Noise Standard in  
NSW: 35dB(A)**

**Noise Estimate SR007  
5 turbines @ 2-3km  
with up to 50 @ 10km**

**35dB(A) !!**

I would like to express my objection to this development for many reasons which I will outline in this document. From scoping report to the issue of SEAR's and the two attempts to provide justification of the development with an overdue and incomplete EIS, leading to an almost 2 year wait for its "amendment". This has outlined the developer's ineptitude in understanding the process, even with their engagement of professionals to do the work for them. Finally, the insulting "response to submissions" where the developer shows their complete disregard to non-involved neighbours and their need to say once again, "we have engaged the community". I will demonstrate in this document how words were never followed up with actions. They have never convinced me or many members of the community, of their genuine belief in "best management practices" (as they leverage in their responses), shameless in their lack of adhering to their promises with actions to demonstrate their commitment to the development and the people residing in this beautiful town.

**Scoping:**

At this stage a developer using "best practice management" would understand that siting is the most imperative issue of this large-scale industrial development. To "scope" means to select and justify why a site is chosen and consider alternatives. To follow this up with meaningful engagement with the **ENTIRE** community, not just those that support and obtain financial benefit from its approval. Certainly, from the perspective of the developer SOME of this scoping was advantageous to their project:

- Landholders idea to host turbines (stated in WW FAQ 2001)
- Apparent "good wind" prospects (when utilising ridgetops)
- Government goals pertaining to transition to renewables
- Taxpayer subsidies.

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**WALCHA:**

**Population:** 3016

**Employment:** Fully  
Employed (ABS 3%  
unemployed)

**Industry:**  
Agriculture  
Forestry/timber  
Tourism  
Retail & Services  
Art & Culture  
Education & Health

**Health:**

At least 10% of the  
population suffer  
respiratory/lung  
health issues  
(Considered higher  
than average for the  
region, state and  
country – ABS data)

**Accommodation:**

Walcha has limited  
availability for rental  
at any given time.  
(realestate.com.au)

However, from a community, environmental and economic perspective, scoping should have considered and mitigated the risks to:

- Proximity of non-involved neighbours
- Disturbance to visual amenity
- Disturbance to peace and way of life in a rural setting
- Destruction of the tourism industry e.g. recreation, open air gallery, bike riding, sight-seeing and farm stays not just when in operation but throughout the construction period of 5 years.
- Destruction of habitat and impacts to biodiversity labelled by NSW Government as “unique” and “valuable”
- Local business especially transport operators and non-involved neighbours’ farm operations – 5 years of impacts
- Property values – completely disregarded throughout the entire process

And so on, the impacts are so numerous that had the developer “scoped” and using what they quote as, “best practice management” would have considered a less biodiverse and inhabited area to ensure an easier process through Planning. As it is the scoping was performed by landholders wanting additional income to their farming activities approaching developers rather than the other way around (outlined in NSW Planning guidance material pertaining to “scoping”).

Instead of having followed due process correctly, the Developer is trying to work a process backwards, ignoring the pushback from community and relying on the desperation of government to meet targets. Their disdain to this process is evident and their reliance on leveraging “renewables” at any cost at the centre of their decision making, will most certainly be detrimental to the environment we are trying to protect.

This community had never agreed to the creation of the New England Renewable Energy Zone overlapping such an important part of the region both with respect to farming but also with relation to the proximity to the World Heritage listed Gondwana National Park. The Oxley Wild Rivers National Park is “renowned for its dramatic gorges, waterfalls, and some of the best examples of dry rainforest communities in Australia”. (National Parks)

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*At the issuing of SEARS the Developer received a detailed guideline on what MUST be in the EIS*

#### **WHY WALCHA?**

"The proposed action is located adjacent to the World Heritage Property and National Heritage Place. The proposal is likely to have a **significant impact** on the listed values of the World Heritage Property as it could **reduce the diversity or modify the composition of plant and animal species**. The proposed action also could fragment, isolate or **substantially damage habitat** important for the conservation of biological diversity in the World Heritage property." (SEARS)

#### **Secretary's Environmental Assessment Requirements:**

*"The SEAR's issued by the NSW Department of Planning, Industry and Environment (DPIE), **provide direction** for the preparation of an Environmental Impact Statement (EIS) for the project."* (WW FAQ's).

As such, the Developer was more than equipped to proceed to provide relevant scientific analysis of the Wind Turbine Development and its impacts to the local environment, community and neighbouring properties. To prepare, according to the information and guidance provided, a well-structured and detailed EIS outlining everything government agencies asked for along with what the community would want to know.

#### **Environmental Impact Statement (EIS):**

According to SEAR's document, "The environmental impact statement (EIS) must comply with the requirements of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (the EP&A Regulation)."

Simply stated, an EIS should be a complete document outlining exactly what was asked for without gaps and errors. At the receipt of this document, it would be expected that the Planning Department would send it to the appropriate agencies PRIOR to exhibition so that these errors were highlighted and addressed appropriately. Where was the due process? Not only was the Developer overdue to the expiration of SEAR's but they clearly submitted an inferior document to what was requested. If they were not prepared why start the process? It might be suggested there was a race for approvals and connection to the grid.

The initial exhibition of the EIS should never have occurred until rigorous examination of the document took place by Planning. It was unfair to expect the community to be able to disseminate all the information contained in that document especially considering Planning hadn't. Then to allow the Developer to continue through the Planning process without adhering to any of the guidelines set out. Regardless of the need for renewable infrastructure, processes should apply to all Developers and appropriate actions undertaken to maintain trust in the process.

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**Government Agency  
Responses to the EIS:**

**At least 9 agencies  
had insufficient  
information.**

**Over 10 critical  
assessment tasks  
incomplete or not  
conducted.**

**Winterbourne Wind  
Statement in EIS:**

"Through the implementation of best practice management the potential environmental impacts associated with the project can be appropriately managed, which will also address the community concerns and associated impacts identified during the stakeholder engagement process".

**What management?!**

**Government Agencies Response to the EIS:**

Aboriginal Heritage:

- **Issue with consultation**
- Misrepresentation of importance of Scarred Trees
- Requirement for CULTURAL HERITAGE MANAGEMENT PLAN

Transport for NSW:

- **Not satisfied** with information provided
- **A thorough assessment required** (which is purpose of EIS)
- Conflict with other developments
- SIDRA outputs missing
- Require design for Surveyors Creek Bridge
- Carpooling & Shuttle bus strategy (as Developer outlined this was what they would do without HOW they would do it)

Department of Agriculture:

- Wants Developer to not underemphasise the importance of the region and the town.
- Need for food security in utilising prime agricultural land
- 325ha of BSAL (Biophysical Strategic Agricultural Land) instructs Developer to move infrastructure away to protect
- **Misrepresent** the landscape in the EIS images (negative)

DPE Water:

- **Insufficient information** provided
- "the proponent states water usage would be negligible but volumes should be quantified and source identified"
- If using BORES impact assessment required outlining where, how much, quality, water source, and impacts on other users

Fire and Rescue:

- A comprehensive FIRE SAFETY STUDY (FSS) required outlining adequate levels of onsite fire and lifesaving independence
- **FSS PRIOR to any further submission** – YET PLANNING STILL ALLOWED CONTINUED PROGRESS
- **FSS APPROVAL PRIOR TO CONSENT**
- Require EMERGENCY RESPONSE PLAN

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**Issued SEARS:**  
**17 September 2020**

**SEARS Expiry:**  
**17 September 2020**

"If you do not lodge a Development Application and EIS for the development **within 2 years** of the issue date of these SEARS, you must consult further with the Planning Secretary in relation to the preparation of the EIS." (Planning Secretary's Environmental Assessment Requirements).

**No evidence of such consultation recorded in the Planning Portal**

**Environment Impact Statement Dated:**  
**27 October 2022**

**Exhibition Date:**  
**18 November 2022**

Environment Protection Authority (EPA):

• **Insufficient information:**

- EROSION & SEDIMENT CONTROL PLAN
- STORM WATER MANAGEMENT PLAN
- TRAFFIC NOISE ASSESSMENT
- NOISE IMPACT STATEMENT
- CONSTRUCTION NOISE & VIBRATION MANAGEMENT PLAN

• **Estimate traffic noise in town will exceed thresholds**

Civil Aviation Authority:

- Require flashing lights on all turbines (not in visual assessment for SR007)

NSW Telco Authority:

- "At SEAR's stage the NSW Telco Authority had recommended moving 3 turbines (yet, it continued without response to EIS stage)

Biodiversity:

- Land category **assessment incomplete**
- **"Not considered** critically endangered ecological communities and flora" – the whole point of the EIS?
- "Avoidance and minimisation impacts on biodiversity **insufficient**"
- "Vegetation mapping and vegetation zones are **inaccurate**"
- "The extent of impacts on serious and irreversible impact (SAIL) entities is **unacceptable**" – Code for dead Aussie Natives.
- "Impacts arising from haul route have **not been assessed** or offset"
- Bird and bat utilisation data is **insufficient**
- **Incorrect** listing status of koala and greater glider for assessment
- No impacts identified for NPWS Fire fighting and operations current form of project **IMPEDES firefighting activities in National Park**
- Landscape and visual assessment incorrect
- Noise assessment didn't include National Park
- **Over 37 Recommendations to correct EIS**



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**COMMUNITY  
ENGAGEMENT:  
EXTENSIVE & BROAD**

**INFORM:  
ALL**

**CONSULT:  
WIDER COMMUNITY**

**INVOLVE:  
INTERESTED  
STAKEHOLDERS**

**COLLABORATE:  
KEY STAKEHOLDERS,  
GOVT AGENCIES,  
COUNCIL,  
ABORIGINAL  
COMMUNITIES**

**EMPOWER:  
KEY STAKEHOLDERS**

**As SR007 is a  
direct, non-  
involved  
neighbour, it is  
a key  
stakeholder.**

With as many insufficient/incomplete results how can the Developer and Planning justify the publication of their previous EIS?

This isn't an amendment it is the real EIS with issues remaining, completely ignoring the main concerns of non-involved neighbours.

Community Engagement was not genuine - if a neighbour did not want to sign a 'Neighbour Agreement' the Developer simply ignored their concerns and considered that engagement.

The Neighbour Agreement

SR007 Highly impacted by the development, with 5 turbines closer to the property than the host landholder, offered \$2,000/turbine for, "sign-on-fee and a contribution towards expenses including any legal fees, costs and disbursement's reasonably incurred by the Landholder in conjunction with this Agreement", "be suspended if the Landholder is in breach of any of its obligations under this agreement", "landholder acknowledges and accepts that....visual impacts (including shadow flicker), traffic impacts and noise impacts", "full compensation for any impacts, landowner not to make any requests ..to provide any visual impact mitigation measures to minimise visual impact ..on their dwelling", "the landholder must not bring, or procure any third party to bring, any claims against the developer", "the noise impacts ...that exceed the noise criteria", "landholder must notify developer of sale or transfer of the land", "developer may assign this Agreement to any person without the landholders consent".

**Fair? Reasonable?**

If the developer is incorrect with noise estimates, it would leave a neighbour without any recourse to obtain rectification. The developer hasn't even acknowledged in any visual assessment "shadow flicker" but felt it necessary to include in the agreement.

**The Developer hasn't quantified or acknowledged the exact impact of construction noise, construction activity, construction timeframe on the non-involved neighbours (Key Stakeholders) landlocked behind the construction zone for 5 Years!!**

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#### Engagement Timeline:

##### **Walcha Show 2021**

SR007 approached Developer. It was established SR007 direct neighbour.

##### **September 2021**

Developer presents Neighbour Agreement. SR007 requests more information.

##### **December 2021**

Photographer attends (montage)

##### **February 2022**

Meet for montage with photo behind tree – request a better representation

##### **March 2022**

Link to photomontage emailed

##### **November 2022**

EIS Published

##### **January 2022**

Submitted a response – detailed and articulate with no reply at all from Developer

##### **April 2024**

A representative from the Developer calls to inform RTS due in June  
**In 4 years SR007 had 2 meetings and 2 phone calls hardly extensive!**

### Community Engagement:

#### Engagement Guidelines – Department of Planning & Environment

**Engagement will be extensive**, with a range of groups and individuals. Depending on the project and the local context, engagement may range from 'empower' through to 'inform'.

#### *Purpose of Engagement:*

To build relationships and understand community concerns, issues and opportunities to enhance the project outcomes.

#### Developer - Stakeholder Engagement and Consultation Strategy:

*"Strategy is intended to establish proactive communication and engagement with stakeholders in the community and help ensure that their concerns or issues are clearly understood and resolved". (Scoping Report – Appendix A)*

With the above statement in mind, reviewing the "proactive communication" under, 'Engagement Timeline' in the margin it is clear this goal was not achieved in the experience of SR007 (and from discussions with neighbours, their experience as well).

The developer has had no interest in pursuing communication with SR007 after presenting the Neighbour Agreement. Frankly, signing any document prior to knowing all the details would be imprudent. The Neighbour Agreement was presented for signature a year prior to the submission of the EIS and six months since Walcha Show.

Meeting the Developer at the Walcha Show would hardly be considered a full and thorough consultation when considering the environment at a Show. It was indicated that there would be further contact and discussion. Imagine the surprise to be expected to sign a document waiving all rights without having any knowledge of the impacts. Then to find that not signing would mean being locked out of full and frank discussions on mitigation and avoidance of some of those impacts. When this experience was communicated to Planning on numerous occasions, Planning would say that if the developer has not conducted thorough community engagement the development would not be approved. It is obvious that community engagement has been woefully deficient, and I trust Planning will act accordingly.

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Newsletters, mailouts,  
website, advertising,  
open days over 4  
years.

Newsletters/Updates  
SEARS – EIS (2 years)

8 Updates – none for  
6 months after EIS

Office Shut  
Phones unanswered

**Town Meetings: 3**  
(attended by MP's  
both state & federal)  
**Developer Attend: 0**

**EIS – RTS (2 years)**  
6 updates

**Advocate**  
**12/10/22 – RTS (2yrs)**

**Developer:**  
7 Appearances  
**Voice 4 Walcha:**  
Over 30 various  
informative articles

**Open Days**  
2-3 December, 2022  
Friday 12pm-4pm  
Saturday 10am-2pm  
1 day in total  
including work hours.

### Development Timeline:

Scoping

SEARS 17/09/2020

EIS 18/11/2022 Overdue (SEARS Expired) and incomplete

RTS 08/12/2024 Overdue (5 extensions without due process)

EIS (2) 08/12/2024 Overdue (5 extensions without due process)

### Community Consultation Committee (CCC):

“CCCs provide a forum for discussion between the proponent of a state significant project and representatives of the community, stakeholder groups and the local council on issues relating directly to specific projects. Although a CCC is not a decision-making or regulatory body, it performs an important **advisory and consultative role.**” (NSW Dept Planning)

Callout for Members:	30/11/2020
Meeting 1:	18/03/2021
Meeting 2:	07/06/2021
Meeting 3:	06/09/2021
Meeting 4:	01/11/2021
Meeting 5:	02/02/2022
Meeting 6:	02/05/2022
Meeting 7:	29/08/2022

“The department encourages committee members to discuss concerns and share helpful information about the project with the wider community, including stakeholder groups.” (Dept Planning Guidelines CCC)

There is no evidence of the CCC communicating back to the community any results or ask for any feedback or questions for the developer. The developer was asked by the CCC if they would sign a declaration stating it would not affect land values of neighbours, and they wouldn't sign it. This hasn't been communicated to the community – the acknowledgement of land values. In addition, when asking for HOW to communicate to the community – not one response said “the advocate” which is delivered every week to all residents of Walcha. It was determined that they would use their newsletter, website and social media.



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**Quotes from the  
Developer:**

"We have been talking to project neighbours over the past few weeks, most neighbours appear generally supportive of the project"  
(CCC minutes)

"The wind mostly blows at night & in the morning in Walcha"  
(CCC minutes)

"We will keep lines of communication open throughout the project" (EIS 3.1 Holding message)

**"We will implement what you decide"**  
(EIS Promise to the public)

**With all the statements there is no evidence to support these claims.**

When the CCC was aware of a community group (Voice for Walcha) in opposition to the project – asking questions, involving the community, communicating via website, the Advocate, newsletters etc they should have invited them to attend the meetings. It is encouraged within the Planning Guideline document, however the CCC conducted its dealings with any individual or group in a secretive manner effectively keeping the community uninformed until the release of the Environmental Impact Statement.

When establishing "site visits" the CCC did not visit non-involved neighbours to see their perspective on the project and its impacts. It seems the very core of why a CCC should be formed was missed in the group which didn't deliver any outcomes for communication to the community and key stakeholders.

In effect, the CCC didn't meet objectives set out in the guideline material provided. "The annual report should include a review of the committee's performance and effectiveness over the previous 12 months." (guideline). There does not seem to be any published material on this annual report which may indicate this was not performed. When reviewing the minutes its clear that participation was not consistent (attendance of community representatives e.g. meeting 3 – 6/9/21, 3 out of 4 not in attendance, meeting 7 – 29/8/22, 3 out of 5 not in attendance with 2 resignations).

Clearly claims made by the Developer with relation to Community Engagement are woefully misleading. The guidance provided by Planning has been used and recorded into documentation to demonstrate compliance. Compliance should be evidential with actual data such as dates and times, notes taken during "meetings", follow up to discussions, information to community, an office that's open, a phone line that's answered. If there is a complaints hotline where is the call centre data including names? Tables outlining what was discussed? How were complaints handled along with any outstanding issues? There is a lot of information to wade through which is why statistics/data have been provided in this document to highlight the shortcomings in actual communication not pretence.

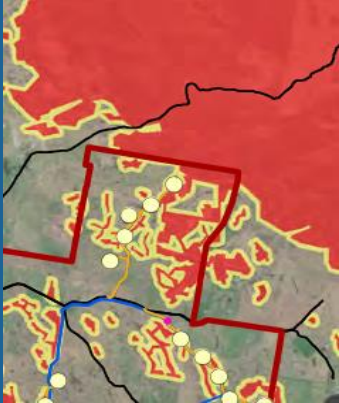
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**Turbines B056, B057,  
B060, B061 & B062  
Located within 3kms  
of at least 10 non-  
involved neighbours**

The turbines proximity  
to the National Park  
and on top of the  
marked bush fire  
zones.

#### **Bush Fire Map**



Clearly the prospect  
of fire is very high,  
and no mitigation will  
save houses or  
National Park during  
a catastrophic fire  
day with high winds.  
As an added risk, the  
use of waterbombing  
firefighting assets is  
limited because of  
the turbines.

The Planning department outlines that the quantity and quality of engagement should be commiserate to the impacts, members of the community impacted and the scale of the development. I believe 118 Industrial sized turbines into a 30km wide footprint should demonstrate the most amount of community engagement possible. Initially the Developer was leveraging the "pandemic" for not conducting field studies and other areas of investigation.

That does not explain the lack of engagement post EIS. Post EIS the Developer stated the CCC would still be involved, and they were disbanded prior to the submission of the EIS. Where is the commitment? If they cannot communicate during the planning process how bad will it get during construction and implementation?

As an example of requiring evidence, the statement, "the wind mostly blows at night & in the morning in Walcha", just a quick ask of AI results in a differing opinion;

"In Walcha, wind patterns can vary throughout the day and night. Generally, the wind tends to be stronger during the afternoon and early evening, often peaking around mid-afternoon. At night, the wind usually calms down, but there can still be occasional gusts, especially in the early morning hours" – data obtained by BOM and Willyweather.

Is this classed as misleading, misinformation or disinformation? Who is held accountable for these types of statements made by the Developer? Who is checking the validity of their information? The reason this statement was checked is due to the lived experience! If you asked any neighbour their opinion on this statement, I am certain they would question it too!

How many inaccuracies need to be pointed out before the project is rejected? Many non-involved neighbours have been provided misleading information in a strategy to minimise the "impacts" of the project with relation to their properties (evidence to follow). The language used in assessment criteria is not factual with some references to subjective interpretation rather than scientific analysis. Photos behind trees for visual assessment, noise monitoring hidden in trees rather than measured at sites impacted by turbines (such as SR007) for noise assessment and setting up bird surveys inappropriately. Standing outside without monitoring equipment at SR007 results in more bird sightings than captured during their surveys including Wedge Tail Eagles & Black Cockatoos.

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**Construction**

**5 years!!**

**Noise**

Construction noise in  
addition to noise from  
vehicles

**Pollution**

No assessment on the  
amount of carbon  
emissions from  
vehicles travelling  
through town and  
into construction  
zone.

**Traffic**

An enormous amount  
of vehicles bringing in  
all the resources  
needed for the  
project – on **ONE**

**ROAD**

**Construction Zone**

**Road Sharing**

**Animal Transport**

**Time to town**

**Accommodation**

Mostly booked and  
limited rentals  
available

**Labour**

Fully Employed (ABS  
Data)

**SR007 Assessment:**

Noise

The assessment of noise is in contention. Voice for Walcha have provided the Developer and Planning with the EIS noise assessment peer reviewed by an independent assessor. The results show that the assessment conducted has errors that would result in many non-involved neighbours being unfairly impacted upon.

After a comprehensive review many procedural and equipment failings were evident along with missing information as to selection of monitoring points and masts not provided in the EIS. Through generalised research, the Vestas model 162 is capable of operation at high wind speeds, yet the developer has only indicated measurements at low wind speed.

When assessing SR007 according to the Developer the sound of 5 turbines within 3km, 80-90 in the 8km range would still result in levels below guidelines, this is the pattern this Developer has taken to achieve compliance. Rather than legitimately obtain compliance through investigation and assessment, the Developer states compliance without evidence.

**SR007 Noise Assessment: 32.8dB(A)** – not stating at what windspeed this measurement is the result of and not at the maximum operational speed of the Vestas 162.

Enquiries online determining basic noise levels of Vestas 162 at highest operational wind speed at 3km (5) and 8km (80) results in levels above estimations provided. Along with the peer reviewed assessment it seems that this measurement provided by the Developer is not accurate. Noise monitoring should be conducted at various times of the year, at the site you are measuring to at least obtain a baseline of background noise.

Non-Compliant

Specific monitoring at locations of non-involved neighbours and evidence should be provided.

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**SR007 Dwelling  
Assessment**

Visibility Distance Zone:

Far Foreground

Viewer Sensitivity Level:

Level 2

**SR007 Assess - Level 1**

**View of Enmore State**

**Forest/ Oxley Wild**

**Rivers National Park**

Visual Influence Zone:

VIZ1

**“Objective: Avoid  
turbines or provide  
detailed justification of  
turbines below the blue  
line. (Bulletin)”**

**Visual Performance  
Objective: Key Feature  
Disruption**

“Turbines are likely to  
be visible element in  
the landscape, but will  
not diminish the key  
landscape features  
when viewed from this  
dwelling”

**SR007 Response:**

**The Developer is  
minimising the impact.  
The montage, when  
enlarged clearly shows  
the entire project  
(when you move away  
from the tree)**

Visual – **Wind Energy: Visual Assessment Bulletin - 2016.**

Although a detailed assessment bulletin it is out of date when you consider the prevalence of Wind Turbines at least 100M taller than they were almost a decade ago at now 240M high. “wind turbines have distinctive outlines and can be over 150 metres in height;” (Bulletin).

Apart from a montage from behind a tree, the Developer has taken images at SR007 to provide a montage and assessment of visual amenity. SR007 has unimpeded views over the project area with views of various hills and fields from its position east to the sunsetting in the west. The Developer has not provided any **Shadow Flicker** information when there are turbines placed on the tops of the ridges in the west. This was addressed in the Neighbour Agreement so there is acknowledgement that it would occur. **From the Bulletin, “an assessment of the numbers of hours of potential ‘shadow flicker’.”**

**SR007 Response:**

Assessment of Viewer Sensitivity Level 2 is **incorrectly assessed** and should be Level 1 due to views of National Park and entire valley. To assess this way allows the Developer to **minimise impacts** over the property and their requirements to address the issues (from the bulletin). In addition, the rude way in which the Developer states,

“Existing vegetation is likely to screen views toward a number of turbines located within the 3km line which make up one of the three sectors. It would be reasonable to suggest the turbines would be visible in only 2 sectors which is acceptable for a receptor with a viewer sensitivity level 2.”

This statement is refuted by SR007, the Developer has reduced the height of the 5 turbines closest to the property in their provided montage, this was redrawn independently, and a significant proportion of nacelle and mast are visible on numerous turbines and takes up 2 sectors alone. **SR007 would be “reasonable” to suggest there are 4 sectors impacting the views** but turbines B001, B002, B003 and so on sit just outside of the 8km zone. As the Developer has not consulted with SR007 there has not been an assessment of the new turbine placements as they sit beyond the 8km zone but may well cause Shadow Flicker.

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RE-EXHIBITION  
AMENDMENT TO EIS  
AND RESPONSE TO  
SUBMISSION**

**SR007 Impacts:**

**Noise** – differing opinions and results of assessments – will be over the guidelines outlined

**Visual** – a minimised impact assessment under the guidelines the property as VIZ1 should not be imposed with 3 sectors

**Bush Fire** – the wind turbines are laid on bush fire zone as well as adjacent to National Park

**Property Value** – the Developer relies on outdated report (2013) in which the author, Robert R Dupont, admits would be irrelevant to this project.  
(Phone call 31/12/24)

**Visual Performance Objectives**

Objective: Wind turbines should not cause more than a low level modification of the visual catchment. Turbines are seen as either very small and/ or faint, or as of a size and colour contrast (under clear, haze-free atmospheric conditions) that they would not compete with major elements of the existing visual catchment.

The second montage provided shows no contrast between the Wind Turbines and the sky. However, the images were enlarged and the Wind Turbines are visible in many numbers throughout the montage. The Wind Turbines can be seen in a higher number than outlined in the Dwelling Assessment, “23 at tip and 20 at hub”, entire turbines are visible.

Objective: **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:**

• **Level 1 (high sensitivity)** – wind turbines visible within the effective horizontal views of **two or more 60° sectors**

**SR007 Response:**

The Developer has made no effort to avoid, minimise or offset the impacts to SR007. Avoid and minimise would be the removal of the 5 turbines for these reasons:

- Proximity to National Park
- In the bush fire zone
- Proximity to over 10 non-involved neighbours
- Creates another sector
- Threatened flora & fauna – Black Cockatoo & Peppermint Eucalyptus Trees
- Removal of access track and biodiversity impacts of those B086 to B062

For the Developer to constantly refer to Community Engagement, the Planning department to state guidelines and Bulletins, how is it that SR007 has had no offers to avoid, minimise or offset impacts after 4 years of planning?



## OBJECTION TO APPLICATION NO. SSD-10471 WINTERBOURNE WIND TURBINE DEVELOPMENT

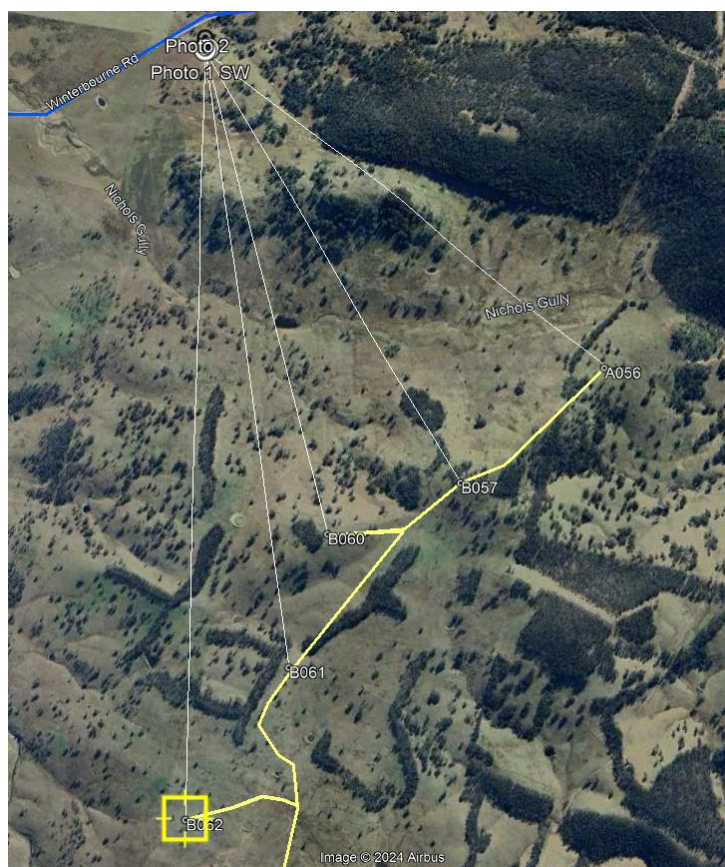
SR007 REPLY TO:  
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### Sight Lines to 5 Turbines – Perspective View

Sight lines to Turbines  
– as labelled. Vertical  
height of topography  
is at the same scale  
as vertical height of  
turbine. Horizontal  
scale is not matched  
to vertical scale, but  
this does NOT  
change the line of  
sight. Horizontal scale  
has been  
compressed for ease  
of viewing.

Independent Assessment of Closest 5 Turbines:  
B056, B057, B060, B061 & B062

Viewpoint – matching the site that the photo montages were taken from.



# OBJECTION TO APPLICATION NO. SSD-10471 WINTERBOURNE WIND TURBINE DEVELOPMENT

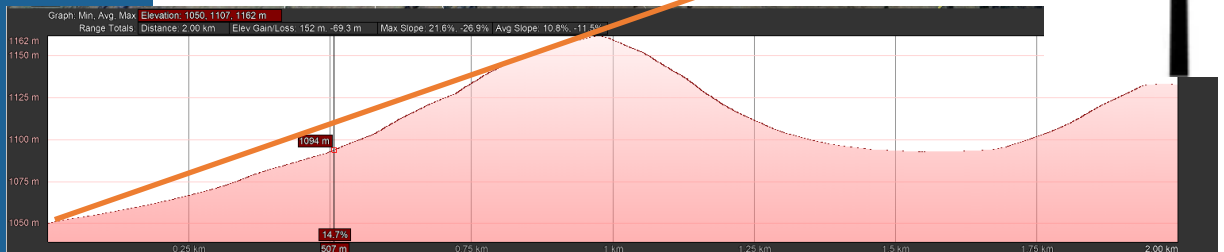
SR007 REPLY TO:  
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Developer montage  
shows just the very tip  
of the blade visible.

260m Turbine  
A056 to Scale

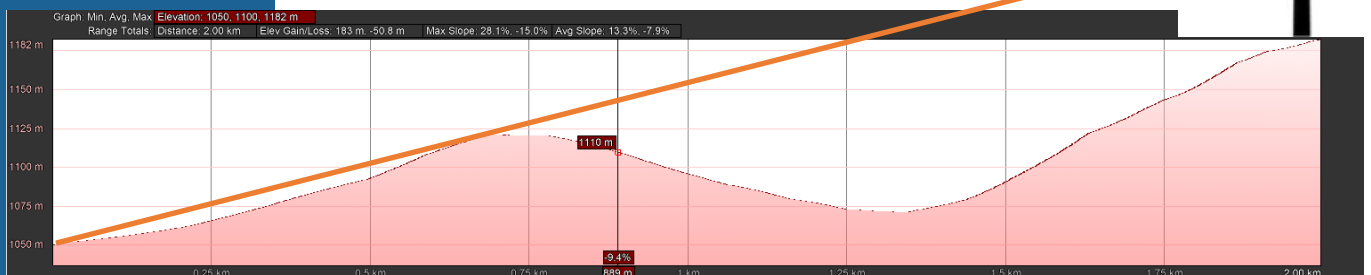
Line of Sight



Developer montage  
shows smaller visible  
stand.

260m Turbine  
A057 to Scale

Line of Sight





# OBJECTION TO APPLICATION NO. SSD-10471 WINTERBOURNE WIND TURBINE DEVELOPMENT

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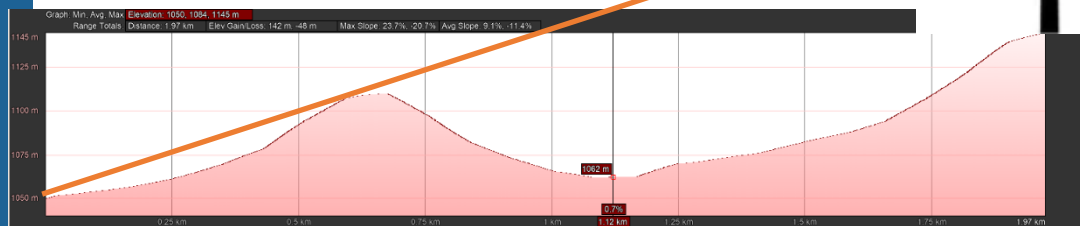
The Developer  
montage shows only  
the hub and small  
part of stand visible

The Developer  
montage shows only  
the very tip of the  
blade is visible

The Developer  
montage shows  
nothing but loads of  
red lines depicting  
where turbines are  
but can't be seen.

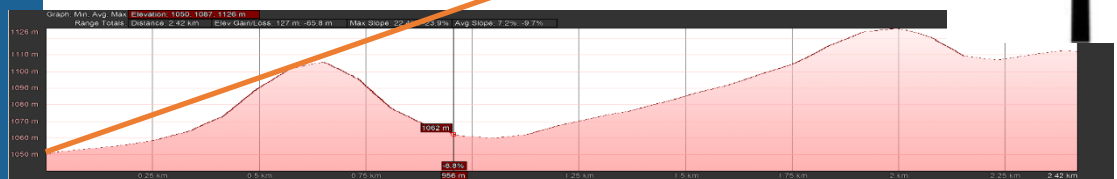
260m Turbine  
A060 to Scale

Line of Sight



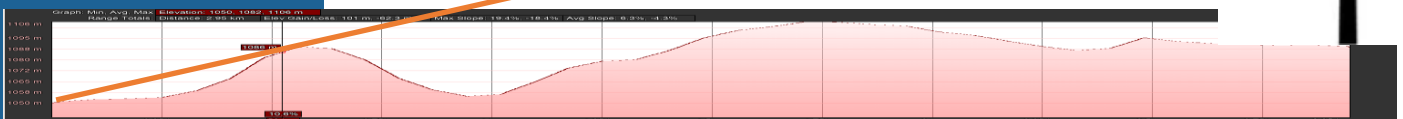
260m Turbine A061  
to Scale

Line of Sight



260m Turbine A062  
to Scale

Line of Sight



**OBJECTION TO APPLICATION NO. SSD-10471  
WINTERBOURNE WIND TURBINE DEVELOPMENT**

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**SR007 REPLY TO:  
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**Current Landscape  
Character Options:**

Landscape character expressing dominant human created paddocks (pastures) or grasslands and associated structures, reflecting valued historic land uses and lifestyles.

**Proposed Landscape  
Character Options:**

Landscape character expressing dominant wind energy uses that exert a strong visual influence over the pre-existing character of the landscape primarily in the form of tall wind turbines with moving blades, access roads, substations and supporting infrastructure.

**Please keep the  
current Landscape  
Character!**

Property Values:

The Developer website FAQ's address the issue of property values by way of referencing a report from 2013,

“Several studies commissioned by the NSW and Victorian governments have examined potential impacts of wind farms on property values and have found no evidence that wind farms lower rural property values, including the Assessment of the Impact of Wind Farms on Surrounding Land Values in Australia (Preston Rowe Paterson, 2013)”

The Developer has not addressed the issue in any serious or genuine manner. A phone call to Robert R Dupont of Preston Rowe Paterson revealed his agreement that the report should not be leveraged for this development. He had researched data predating the publish date of 2013, for the analysis and states a new and rigorous assessment should be done as turbine heights are a lot larger and sites selected seem to involve more residents as sites were selected carefully back in 2013. i.e. not just a renewable energy zone.

Property value costs landholders, in addition to finding genuine buyers, competition in the rural setting involves other criteria such as carrying capacity, homestead, location to town etc. If there is another like for like property where there are no Wind Turbines the value is reduced. In Walcha of late 2 similar grazing properties have yielded polarising values for land size, dse, house etc with one not being located near the wind turbine PROPOSED development the one inside the construction zone resulted in a poor value in comparison. The Wind Turbines have already affected the value of the land in the area of the construction zone. Saleability is reduced and prospects of finding a buyer when towered over with infrastructure is limited.

A new report on land values should be commissioned to determine how Wind Turbine Developments affect land values as there will be more relevant data available than 2013. The issue is still very much at the forefront of objection and should be dealt with appropriately as it is not addressed in the EIS V2.

## OBJECTION TO APPLICATION NO. SSD-10471 WINTERBOURNE WIND TURBINE DEVELOPMENT

SR007 REPLY TO:  
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**The Vestas 162  
Hub Height  
149M**

**Diameter of rotor:  
162M**

**Tip Height:  
230M**

**(From EIS)**

**There is a substantial  
difference between  
visible top and hub  
height when estimating  
visual amenity.**

**Errors in Montage**  
(results in significant  
difference in viewable  
Turbines)

**Errors in timeframe** (3  
years to now 5 years)

**Errors in noise  
assessment** (peer  
review of document)

### Future Pollution:

Copy of Enquiry to EPA – referred to Department of Planning for further enquiry.

13<sup>th</sup> September 2024

Lindsay Fulloon  
Manager Regional Operations  
Environmental Protection Authority  
New South Wales

**Re: Winterbourne Wind State Significant Development (SSD-10471)**  
**Your Ref: DOC22/1096601 Dated 12<sup>th</sup> December 2022**

Dear Mr Fulloon,

I have recently become aware of the significance of microplastics in the agricultural setting via news outlets over the past several months. I was informed that the legislation in NSW directly addresses contaminants of plastics which is regulated via your agency via Dr Brown (UNE). Upon reading the legislation it appears that we have valid concerns about the issue with relation to this development.

Your response to the EIS outlined what information you would like the developer to address as their response was inadequate. The development is still behind with relation to the Environmental Impact Statement as your response was in line with other government agencies asking for more detailed information. An extension (5) has been granted and a response to the EPA (document reference above) hasn't been submitted as far as I can see on the NSW Planning Portal. However, your request for information did not address the potential impacts of erosion of the blades and did not ask for information on what their blades are made with (as far as being an identified contaminate according to the legislation). I have been informed that it is up to the developer to prove they do not contaminate as opposed to small communities engaging researchers to conduct field studies on current wind turbine facilities to prove they do.

Given there have been so many delays it has provided me an opportunity to investigate the development further, with reference to the erosion of the turbine blades over time. The proponent has not provided any information of the materials used in coating the blades but from research I have ascertained that an epoxy coating is over the blades as a rule according to other manufacturers of wind turbines.



## OBJECTION TO APPLICATION NO. SSD-10471 WINTERBOURNE WIND TURBINE DEVELOPMENT

### SR007 REPLY TO: **RE-EXHIBITION** AMENDMENT TO EIS AND RESPONSE TO SUBMISSION

**"The polymer materials used in the Vestas V162 wind turbine blades typically include epoxy resins and polyester resins." Vestas Website**

#### CONSTRUCTION

**Times are incorrect in the EIS V2 for Saturday work – non compliant with EPA guidelines.**

**The EPA requested Construction noise assessment for town as their assessment it would not comply with traffic noise. Developer feels the project is "temporary" and such an assessment does not apply – 5 years is hardly temporary!**

There is reference on the Internet of epoxy being comprised of 33% Bisphenol A. Curiously, 27% (2013 figures) of European consumption of epoxy is used for manufacture of turbine blades. These figures establish that a large portion of the turbine blade is made up of BPA and estimated 1kg of BPA can contaminate 10 billion litres of water! This is a major concern to our community which derives income from grazing livestock and can only conclude if the development proceeds, we will be consuming BPA as it will enter the food chain. In addition, there are many water ways, dams and the National Park to consider with relation to the contaminants entering the water table.

There is a good amount of research and information online pertaining to the erosion as a commercial consequence i.e. financial costs to manufacturers for time with service and repair along with slow decline in the production of power as this is occurring – so basically it is widely accepted that there is such erosion. From there we need to determine just how much of this erosion contains contaminants as listed.

The long-term impacts of this could be catastrophic when considering the cumulative amounts throughout NSW and indeed the country. However, NSW can do something about it as there is legislation and a regulator. So, as the regulator can you please ask the developer to provide the relevant information you need to assess if this is of widespread concern?

This is only one of the many documents I have read through about this issue but there are many more along with diagrams of the exact erosion I am referring to. In the instance of this development, 118 turbines with 3 blades each eroding even a gram of BPA is significant – then extrapolate that to the wider adoption of this technology and it becomes worse than any introduced species, poisons, contaminants etc we have now discovered have negatively impacted our environment.

[Leading Edge erosion and pollution from wind turbine blades Final 5 July English 130721 \(wind-watch.org\)](#)

I look forward to your urgent response and action on this matter.

Please consider investigating this issue further as more information is available since scoping of the project.

Lastly, this document is the size it is due to the previous incomplete EIS. Reading the Agency responses caused even more concerns than not knowing what safeguards are in place through these agencies. The Developer took 2 years to respond to those issues. The issues concerning SR007 have not been addressed in this EIS V2., the Developer states there has been no variation. This means their assessment still contains the errors outlined above with relation to photo montage, elevations and noise.

Thank you for your time

Resident SR007