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6 December 2024

The Secretary

NSW Department of Planning

SUBMISSION RE MALLEE WIND FARM EIS

PROCEDURAL IRREGULARITIES

Grand Junction Pty Ltd objects to the proposal for the following reasons:

INADEQUATE PERIOD OF EXHIBITION

The exhibition period is too short to allow for a proper public exhibition for the following reasons:

- The EIS is hundreds of pages long, which no ordinary person with some responsibilities could digest and respond to in this period – a full-time development assessment professional would require longer than this to consider and members of the public cannot be reasonably expected to digest and respond more quickly than a full-time development assessment professional.
- The EIS contains many Technical Papers, over a thousand pages in total – again no ordinary person with some responsibilities could digest and respond to in this period – a full-time development assessment professional would require longer than this to consider and members of the public cannot be reasonably expected to digest and respond more quickly than a full-time development assessment professional.
- The exhibition period has covered the pre-Christmas and end of school year period when many of the impacted community members cannot be reasonably expected to respond to an EIS.

As previously requested, the exhibition period should be extended to mid-February to allow proper consideration by all impacted people.

NEED FOR STRATEGIC STUDY/CONTEXT FOR WIND/SOLAR/BATTERY PROJECTS IN WENTWORTH TO BE DETERMINED PRIOR TO ASSESSMENT OF INDIVIDUAL PROJECTS

It is contrary to sound planning practice that it is proposed to determine individual planning determinations about wind/solar/battery projects in Wentworth, such as the Mallee Wind Farm, before any over-arching strategy for the same has been considered or determined.

While the vast boundaries (400km by 100km) of the South West REZ were determined “following a detailed statewide geospatial mapping exercise undertaken by the NSW Government in 2018..... Developing the South West REZ will be complex and will take some years to design and build. The



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NSW Government will closely engage with stakeholders on the delivery of the REZ.” (EnergyCo website)

EnergyCo / NSW Government promised engagement with stakeholders (such as communities/landholders) on the delivery of the REZ. The REZ was not intended to provide strategic support for any particular project or consider the local impacts of projects or cumulative projects. The purpose of the REZ is to “group new wind and solar power generation into locations where it can be efficiently stored and transmitted across NSW” (EnergyCo website).

The impact of say 10 to 15 large wind/solar projects evenly spaced over the vast South West REZ is quite different to the impact of 40-60% of these Projects being located close to Buronga Gol Gol as may be the case.

Given six projects are proposed close to Buronga Gol Gol Wentworth it is appropriate that there be consideration of the cumulative impacts of the projects. The EIS glosses over these cumulative impacts given its objective is approval of the Mallee Wind Farm rather than the best objective for the Wentworth Shire or indeed the REZ.

If every project is not to proceed, whether that be for grid capacity or economic reasons, surely it would be sensible to only approve the least impacting projects or parts of projects. Here, the portion of the Mallee Wind Farm closest to Buronga Gol Gol should be the last wind project approved rather than the first.

Mallee Wind Farm is the most impactful wind/solar/battery project of any proposed for Wentworth Shire and should be the last place in the Shire that a wind farm should be approved.

WENTWORTH COUNCIL INPUT COMPROMISED

While not consent authority Wentworth Council has a critical role to represent the community and consider impacts on traffic and services. Notwithstanding this, on 1 February 2023, Wentworth Council’s Matthew Carlin advised that Council “does not have any comment to make”. It is extraordinary that the Council of a small community would have no comment on a billion-dollar project with multiple impacts on community services.

At all relevant times Wentworth’s Mayor was one of the host landholders for the Mallee Wind Farm. The proponent, Spark, knew of this conflict and it is not clear that it did anything to avoid the conflict. Further the April Wentworth Shire Council Minutes show that Spark met with the Wentworth Mayor notwithstanding they were aware he was one of the host landholders for the Project and has a clear conflict of interest.

There should be an investigation into why Wentworth Shire made no submission at the SEARS stage and the proposal should be re-started with clear exclusion of any party with conflicts of interest.



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NEED FOR A PUBLIC HEARING

Public hearings have been provided for Proposals of similar scale and impact and should be provided for here.

EIS BASED ON MISLEADING OR OMITTED INFORMATION ABOUT PROXIMAL NEIGHBOURS, CONSULTATION AND ACCESS

The EIS has omitted information that would run counter to approval of the Project and has included information that the Proponent knows is misleading.

Specifically, the EIS has:

- Falsely stated there are no proximate landholders to avoid analysis of impacts to neighbouring land.
- Stated in the Rex J Andrews Transport Study that the Project can potentially utilize Danson's Road as an alternate access road when the Proponent knows this is a private road and that the Project has specifically been denied access to it.

These statements undermine the whole EIS and require the EIS to be corrected and re-exhibited.

Yours sincerely

Bob Wheeldon

Director

