GrandJunction

9 December 2024

The Secretary

NSW Department of Planning

OBJECTION TO PROJECT

MALLEE WIND FARM SITED FOR MAXIMUM ENVIRONMENTAL IMPACT

Rather than being sited to minimize environmental impacts the Mallee Wind Farm has perversely been sited in a location that maximizes environmental impacts.

Specifically:

1. *EIS INADEQUATELY CONSIDERS VULNERABLE SPECIES*

The EIS does not adequately consider the proposals impacts on a number of vulnerable species including:

- Mallee Fowl;
- Regent Parrot;
- Numbats;
- Bilbies; and
- Greater stick nest rats.

2. *PROJECT REMOVES HABITAT*

Habitat that will be removed by the Mallee Wind Farm provides:

- A habitat for the Mallee Fowl;
- A feeding area for the Regent Parrot; and
- Potential habitat for the numbats, bilbies and greater stick next rats in Mallee Cliffs National Park that are intended to be released outside the protected area of the National Park in the coming years.

3. *EIS FAILS TO CONSIDER IMPACTS ON MALLEE CLIFFS NATIONAL PARK AND PRIVATE CONSERVATION AREAS*

Mallee Cliffs National Park is being established as a protected area for endangered species under the NSW Government Saving our Species Programme but this is not properly analysed in the EIS.

The project threatens the park through:

- broad scale clearing adjacent to it;

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- overshadowing and blade flicker within the park;
- sound impacts on fauna within the park; and
- fire risk.

Many private conservation reserves were created as part of the Mallee Sustainable Farming initiative with the intention of improving connection with the National Park. The project undercuts this through impacts on the reserves and the Park. There is inadequate consideration of these Private Conservation Areas in the EIS.

4. POTENTIAL FOR BUSHFIRE TO DESTROY MALLEE CLIFFS NATIONAL PARK AND NEARBY PRIVATE CONSERVATION AREAS

Given the prevailing westerly wind any fires ignited by construction or operation of the Mallee Wind Farm are likely to directly impact Mallee Cliffs National Park.

Indeed, given the absence of buffers between the Project and Mallee Cliffs National Park there is a significant likelihood the National Park could be completely destroyed by such a bushfire. The consequence of this would be significant with loss of the endangered species introduced to the National Park and the species such as Mallee Fowl located in and around the National Park.

The EIS Riskcon Report states in paragraph 4.7 and 4.8 that the transformer can cause fires and explosions but that:

"4.7 "...this incident [fire] has not been carried forward for further analysis"

"4.8 "...this incident [explosion] has not been carried forward for further analysis"

The distribution of electricity via high voltage transmission lines and associated equipment also has the potential to cause ignition of bushfire fuels, either within or adjoining the transmission line area.

5. IMPACTS ON GOL GOL LAKE AND SWAMP AND MIGRATING BIRDS

The Project will threaten migrating birds that utilize the Gol Gol Lake and Swamp in massive numbers. The EIS undertakes no significant analysis of this issue.

VISUAL IMPACTS / SHADOW FLICKER/ BLADE GLINT / NOISE

The Mallee Wind Farm will have a dominant visual impact on the Mallee Cliffs National Park, Buronga Gol Gol and surrounding landholders. It will also have a dominate view from the lunette around the Gol Gol Swamp.

Paragraph 6.5.3.5 states that there will be shadow flicker impacts to 11 kilometres of Arumpo Road and the western edge of Mallee Cliffs National Park. There is no analysis of these impacts. There will also be shadow flicker impacts on neighbouring properties and the Gol Gol Swamp, but these are not discussed or analysed.

Given the flat landscape around Buronga Gol Gol and the cumulative effect of the Gol Gol Wind Farm, wind towers will become the dominant visual impact on the horizon from viewpoints all around Buronga Gol Gol. Views of wind towers will dominate the route to Mungo National Park via the Arumpo Road. Views of wind towers will dominate the vistas within and near Mallee Cliffs National Park.

Noise mapping shows impacts to a large area of Mallee Cliffs National Park and Woorlong Station.

WINDFARMS BEING BUILT WITHOUT PLANNING/STRATEGY

Multiple wind farms are proposed for Wentworth District without any co-ordination.

Assessments of Cumulative Impacts on noise, views, services and community are simplistic. NSW Planning requires a strategic approach before they allow urban development, and the same principle should apply here. There should be a freeze in all wind farm development in Wentworth until such a strategy has been completed.

The REZ Plan does not consider the impacts of many wind and solar farms being built together and specifically stresses the need for co-operation with the community on the roll-out of the REZ. EnergyCo has principally considered strategic factors related to energy infrastructure, but it is essential that consideration is given to other strategic factors such as impacts on regional growth, tourism and non-energy services.

TOO CLOSE TO BURONGA GOL GOL

Mallee Wind Farm is too close to Buronga Gol Gol and the Mallee Cliffs National Park. The Project area is huge and there is ample room in the Project Area to position the wind turbines a further 10-15km further from Buronga Gol Gol. Grand Junction does not support the project but at the minimum it should be moved away from Buronga Gol Gol, Gol Gol Swamp and Mallee Cliffs National Park. The visual impacts on BGG will blunt the growth in this community.

TRAFFIC IMPACTS UNMANAGEABLE WITHOUT NEW BRIDGE

The Project Traffic will require the main entry from NSW to Victorian Sunraysia to be exclusively used for wind turbine and construction traffic for some time and there is no viable alternative route. The EIS provides no detail on how this will be managed and simply identifies the need for consultation. Similarly, the road network, and particularly the existing congested Chaffey Bridge, is inadequate to cope with the addition of 400 construction staff who will regularly travel to Mildura.

SERVICES IMPACTS

The Project has provided no plan for how Wentworth Shire can deal with an

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additional 400 construction workers without impacts on health care, housing, water and sewer. Indeed, no detail at all is provided on a proposed 400-person camp.

NEED FOR PROJECT REVISION AND RE-EXHIBITION

The EIS was released just after NSW's new Renewable Energy Planning Framework was released. The EIS has not considered the new Framework or the Transitional Arrangements that apply to the Project / EIS.

The EIS should be re-exhibited with a Supplementary Report dealing with the Framework and Transitional Arrangements. Specifically, this needs to include a review of the development rights of neighbouring landholders for residential accommodation, tourist and visitor accommodation or eco-tourism (permitted in Wentworth RU1 Zone).

The Project needs to be preferably cancelled or if not, revised thoroughly, particularly by:

- moving all the Southern wind turbines and the lower half of the Central wind turbines to the northern Project Area
- relocating the transmission line and switching station 2km east to provide a buffer around it

The attached maps show how, within the same Project Area, wind turbines could be relocated to have lower impact on Buronga Gol Gol and the Mallee Cliffs National Park.

Yours sincerely

Bob Wheeldon

Director

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Option to reduce impacts on Buronga Gol Gol & Mallee Cliffs NP.

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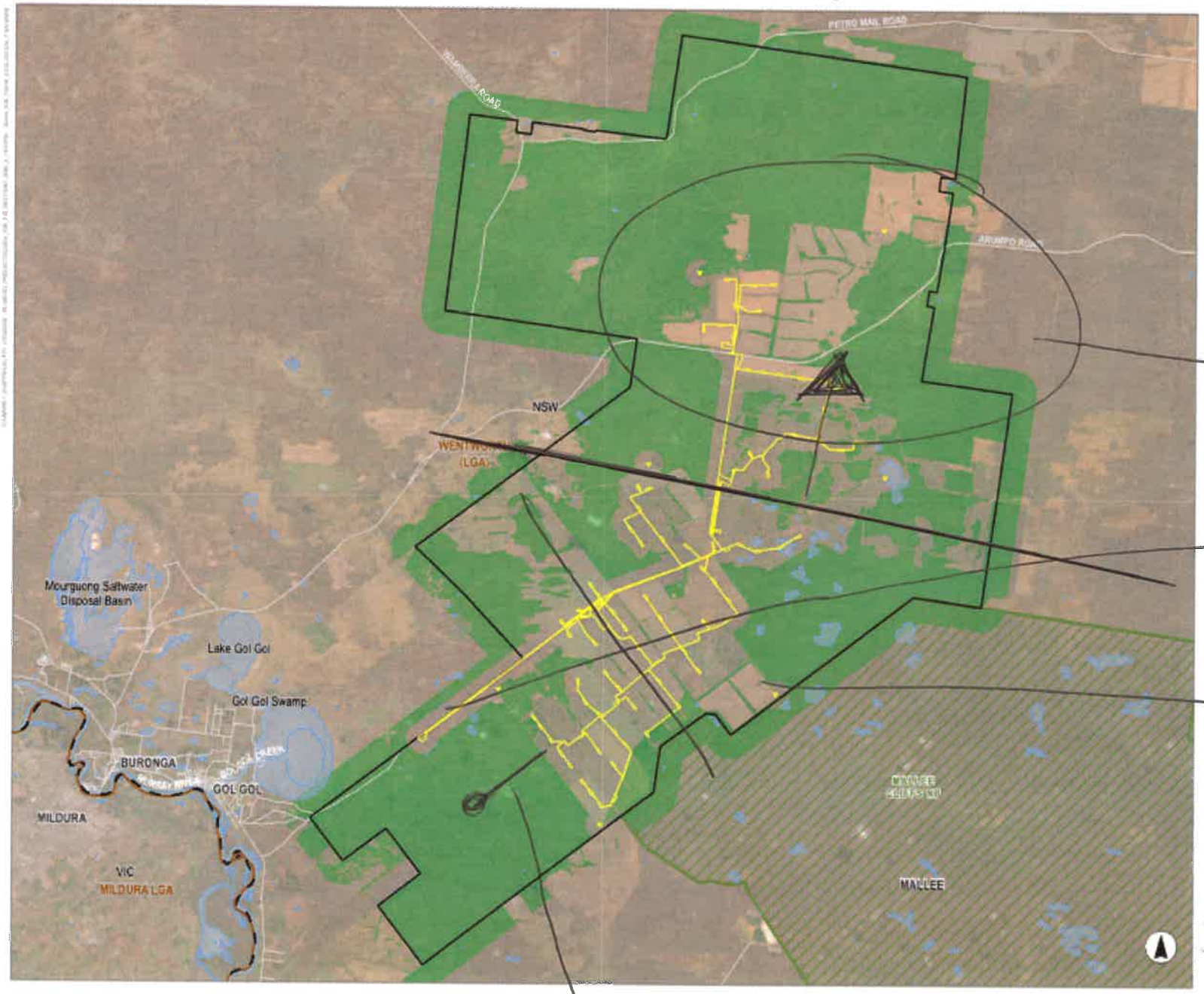
FIGURE 2.8

Ecological features in proximity to the Project



Lower impact turbine locations.

Move away boundary

Delete all southern turbines.

Relocated powerline & switching station.

Image Source: ESRI Basemap (2024) Data source: NSW DPSI (2024), VIC DELWP (2023), Spark (2024)

high impact area - delete.

Lower impact area.

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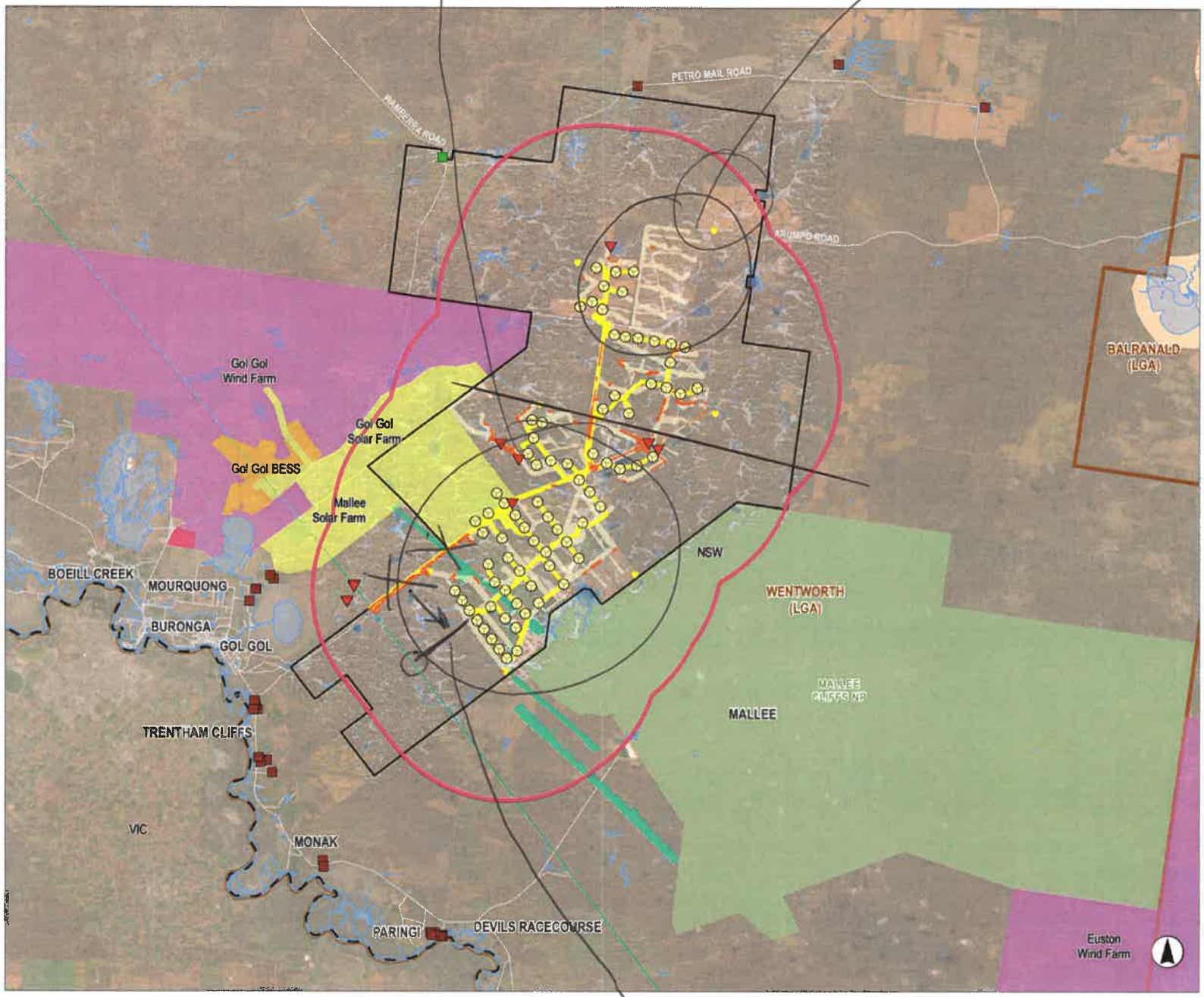
FIGURE ES.4
Project Constraints



Legend

- Project Boundary
- Study area (8km from WTGs)
- Disturbance Footprint
- Wind Turbine Generators
- Aboriginal Sites
- Host Dwelling
- Non-associated Dwelling
- Mallee Bird Community of the Murray Darling Depression Bioregion EEC
- Category 1 - Exempt Land, Cleared, Road and Tracks
- Existing HV Transmission Lines
- Willandra Lakes Region / National Heritage Property
- Willandra Lakes World Heritage Area
- State Border
- Local Government Area (LGA)
- NPWS Estates
- Road
- Watercourse
- Waterbody

Nearby Projects

- Solar Farm Project
- Hybrid Project
- Wind Farm Project
- Euston Mineral Sands Project
- Buronga Landfill Expansion

1% AEP Flood Hazard

- H1
- H2
- H3
- H4
- H5
- H6

0 6,000 12,000
Metres

Scale 1:300,000 at A4
GDA2020 MGA Zone 54

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Image Source: ESRI Basemap (2024) **Data source:** NSW DFSI (2024), VIC DELWP (2023), Spark (2024)

move away boundary.

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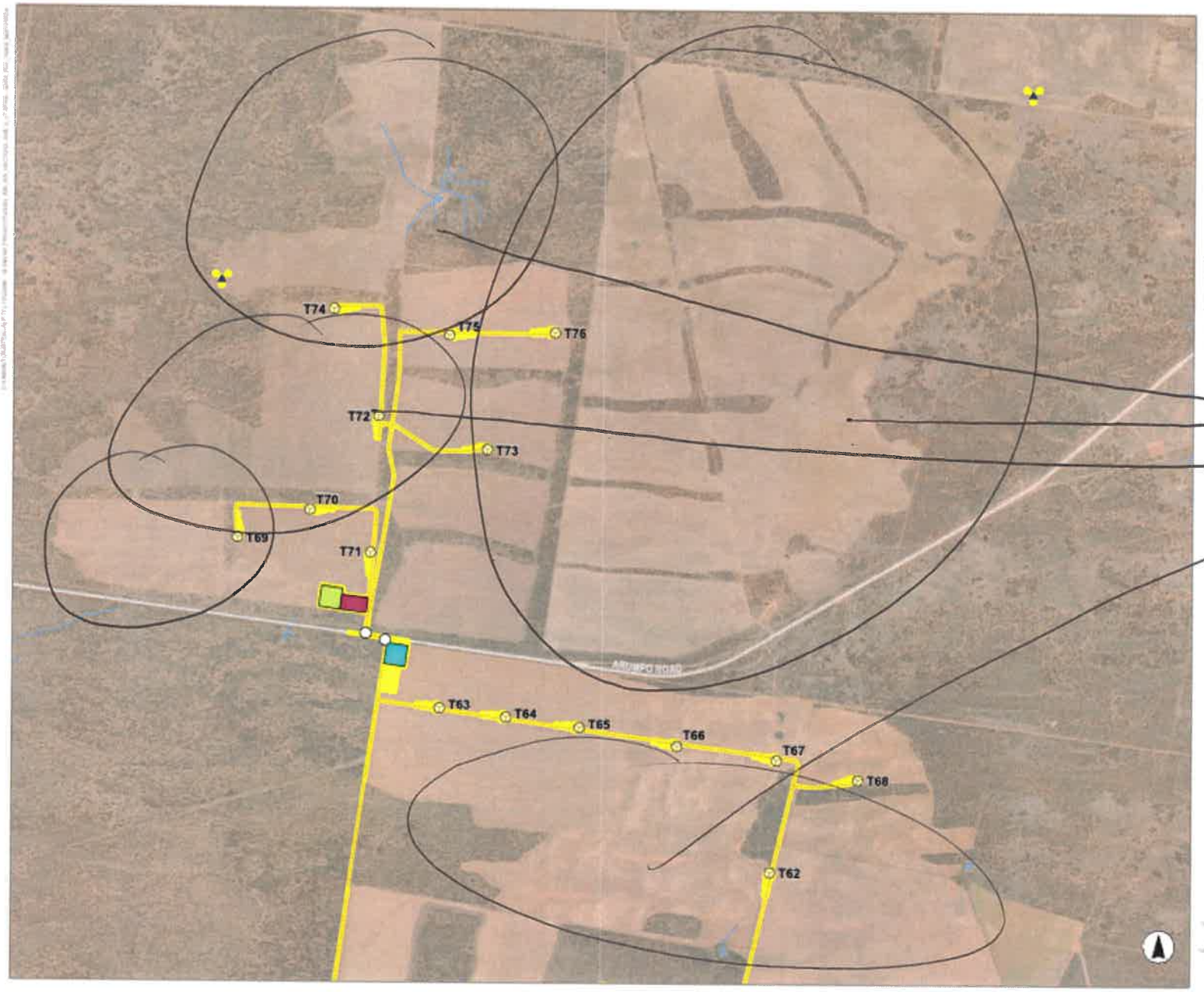
FIGURE 3.2

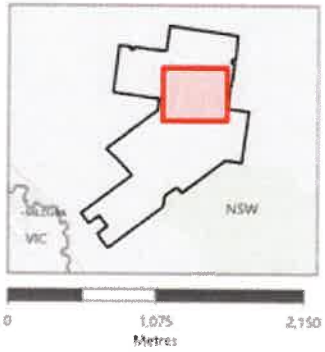
Project Layout (Northern Area)



Legend

- Project Boundary
- Disturbance Footprint
- Wind Turbine Generators
- Permanent Meteorological Masts
- Access Points
- Access Tracks
- TWA Facility
- Construction Compound
- Operations and Maintenance Facility
- Road
- Watercourse
- Waterbody

Lowe impact areas.



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GDA2020 MGA Zone 54

Image Source: ESRI Basemap (2024); Data source: NSW DPSI (2024), VIC DELWP (2023); Spark (2024)

Lower impact areas.

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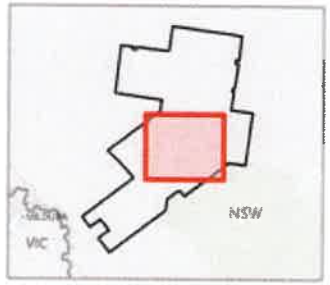
FIGURE 3.3

Project Layout (Central Area)

Legend

- Project Boundary
- Disturbance Footprint
- Wind Turbine Generators
- Permanent Meteorological Masts
- Access Tracks
- HV Transmission Line
- Battery Energy Storage System (BESS)
- Collector Substation and Switchyard
- Construction Compound
- NPWS Estates
- Watercourse
- Waterbody



0 1,000 2,000
Metres

Scale 1:60,000 at A4
GDA2020 MGA Zone 54

Image Source: ESRI Basemap (2024) Data source: NSW DPSI (2024), VIC DELWP (2023), Spark (2024)

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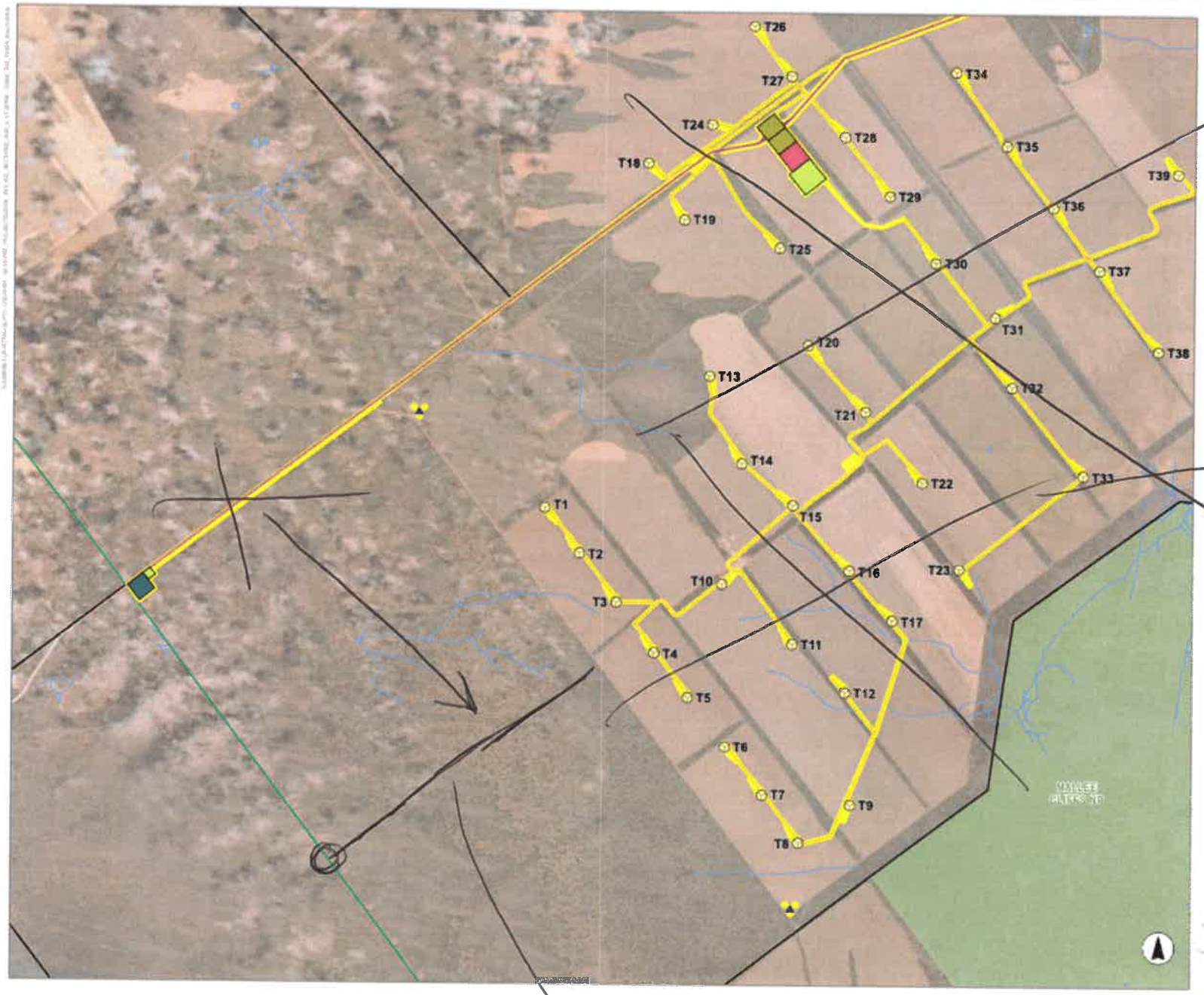
FIGURE 3.4

Project Layout (Southern Area)



Legend

- Project Boundary
- Disturbance Footprint
- Wind Turbine Generators
- Permanent Meteorological Masts
- Access Tracks
- HV Transmission Line
- Battery Energy Storage System (BESS)
- Collector Substation and Switchyard
- Construction Compound
- Switchyard
- Existing HV Transmission Lines
- NPWS Estates
- Road
- Watercourse
- Waterbody

highest impact areas — delete

0 1,000 2,000
Metres

Scale 1:60,000 at A4
GDA2020 MGA Zone 54

Image Source: ESRI Basemap (2024) Data source: NSW DPSI (2024), VIC DELWP (2023), Spark (2024)

Transmission line & switching station moved east.

7.0 Preliminary Zone of Visual Influence

7.1 Overview of Preliminary Zone of Visual Influence

The Bulletin states *'the use of Geographic Information Systems (GIS) to facilitate the application of the tools will streamline the evaluation phase of the evaluation phase of a project during the pre-lodgement stage. This can also assist in refining the number of turbines and viewpoints that will ultimately need more detailed assessment.'*

A Zone of Visual Influence (ZVI) diagram has been prepared for the Project to illustrate the theoretical visibility of the proposed turbines from the blade tip height. **Figure 14** depicts the areas of land from which the proposed development may be visible and provides an indicative number of wind turbines based on the blade tip height of 280 metres.

The ZVI (also known as a Zone of Theoretical Influence Model) represents the area over which a development can theoretically be seen and is based on a Digital Terrain Model (DTM). The ZVI usually presents a bare ground scenario - ie. a landscape without screening, structures or vegetation, and is usually presented on a base map (Scottish Natural Heritage, 2017).

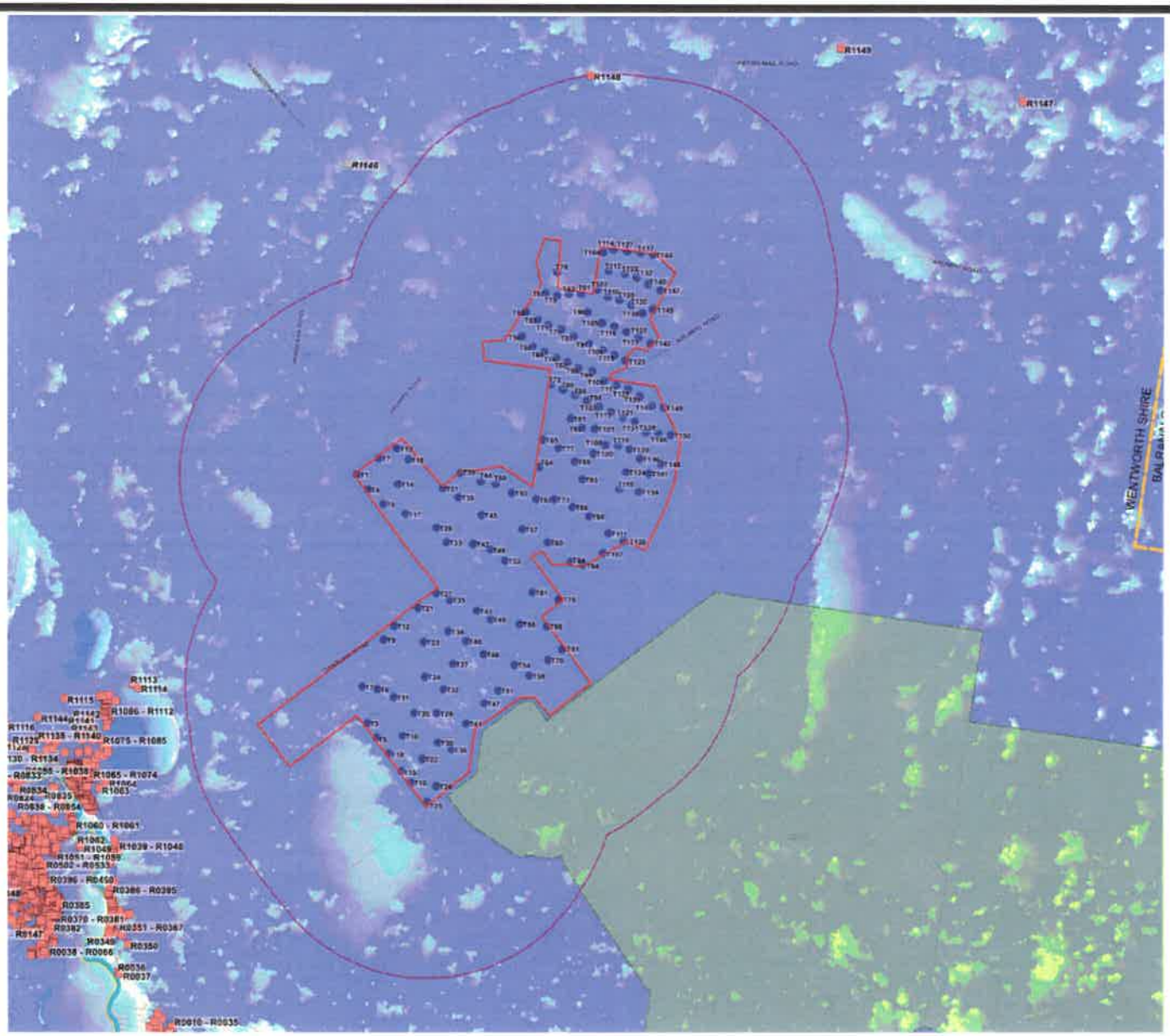
The ZVI has been determined through the use of digital topographic information and 3D modelling software *WindPro*. The ZVI has been assessed to approximately 30 km from the Project. Although it is possible for the development to be visible from further than 30 km away, it is generally accepted that beyond 10 km visibility is diminished.

7.2 Summary of Preliminary Zone of Visual Influence

The following provides a summary of the Zone of Visual Influence diagrams prepared for the Preliminary Layout of the Project.

- Due to the relatively a flat topography, the majority of the turbines associated with the Project will be visible from the surrounding areas.
- Certain areas to the southwest and west of the Project are characterised by shallow topographical changes by embankments along lakes and swamps. The ZVI identifies these areas to have limited views due to the minor topographical differences between them and the Project.
- Views to most turbines associated with the Project are likely to be available to the dwelling located approximately eight (8) kilometres of the nearest proposed turbine. This assessment is based on a consideration of topography alone and does not consider intervening elements such as vegetation and existing structures.
- Following the development of the ZVI, detailed site investigations (in the form of a viewpoint analysis inventory and dwelling assessments) have been undertaken to ground-truth the findings. Preliminary viewpoint analysis been included in ***Appendix A*** and ***Appendix B***.
- Further detailed assessment from areas identified in the ZVI will be undertaken in the EIS Phase of the assessment.

It is important to reiterate that this is a preliminary assessment based on worst case scenario that does not consider the impact of vegetation or structures. Based on the preliminary assessments in ***Appendix A*** and ***Appendix B***, it is likely that existing intervening vegetation surrounding non-involved dwellings is likely to reduce views of turbines from a number of locations.



Zone of Visual Influence
Blade Tip Height 280 m
Proposed Mallee Wind Farm

LEGEND

- Project Boundary
- Proposed Turbine Locations
- Involved dwellings
- Non-involved dwellings
- 8,000 m from nearest proposed wind turbine location

Number of visible turbines (at tip height)
(Based on topography alone):

- 0
- 1-49
- 50-89
- 90 and above

Note:

The ZVI is a preliminary assessment tool that represents a bare ground scenario - ie. a landscape without screening, structures or vegetation. As accurate information on the height and coverage of vegetation and buildings is unavailable, it is important to note the ZVI is based solely on topographic information. Therefore this form of mapping should be acknowledged as representing the worst case scenario.

N

0 2 4 6 8 10(km)

Figure 14 Zone of Visual Influence (Blade Tip 280 m)

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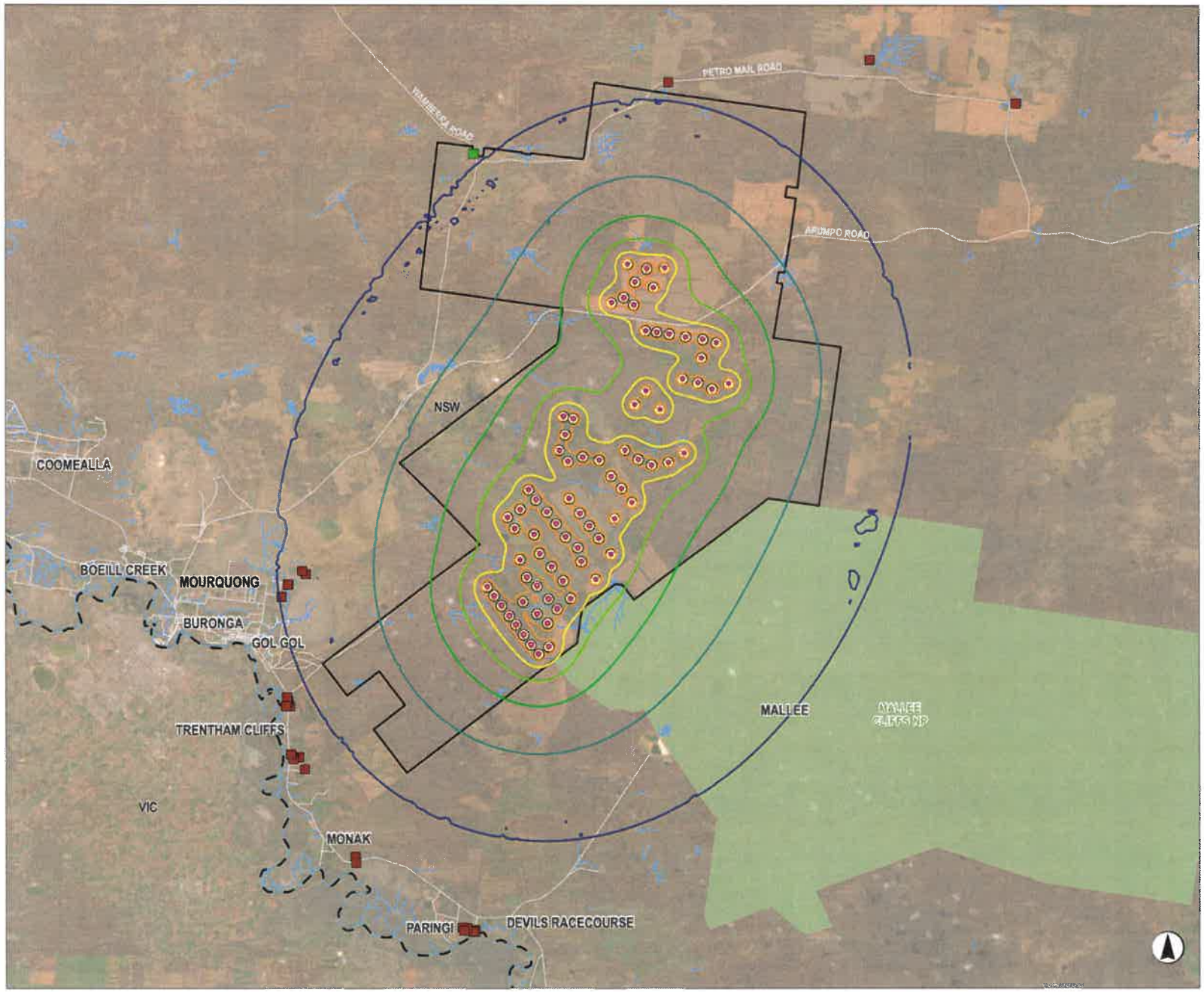
FIGURE 6.16

Predicted Wind Turbine Noise Level Contours



Legend

- Project Boundary
- State Border
- NPWS Estates
- Road
- Watercourse
- Wind Turbine Generators

Dwellings

- Host Dwellings
- Non-associated Dwellings

Predicted noise contour (dB)

- 50
- 45
- 40
- 35
- 30
- 25
- 20

0 5 10
Kilometres

Scale 1:300,000 at A4
GDA2020 MGA Zone 54

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Permitted by Wentworth LEP in RU1 Zone.

eco-tourist facility means a building or place that—

(a) provides temporary or short-term accommodation to visitors on a commercial basis, and

(b) is located in or adjacent to an area with special ecological or cultural features, and

(c) is sensitively designed and located so as to minimise bulk, scale and overall physical footprint and any ecological or visual impact.

It may include facilities that are used to provide information or education to visitors and to exhibit or display items.

Note—

See clause 5.13 for requirements in relation to the granting of development consent for eco-tourist facilities.

Eco-tourist facilities are not a type of ***tourist and visitor accommodation***—see the definition of that term in this Dictionary.