

16th May 2022

Director – Energy Assessments
Development Assessment
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Sir/Madam,

Re Thunderbolt Wind Farm SSD-18087896

We are writing on behalf of our business, to **object** to the abovementioned proposal for the reasons included in the table below.

Our business produces superfine wool, fat lambs and beef cattle and operates based on regenerative agriculture principles. We declare that we have not made any reportable political donations during the past two years.

Aspect	Objection
Landscape, visual and shadow flicker	<p>The house on our farm will be affected by shadow flicker in the afternoon and at night as the moon sets. This is where our business is run from and these kinds of disturbances are likely to impact management's ability to sleep and conduct business as usual.</p> <p>Our long term property plans include implementation of farm stays and camping opportunities so tourists and members of the public can learn about and enjoy healthy regenerative agricultural options that benefit the environment, reduce carbon emissions and improve soil and ecosystem health.</p> <p>The landscape to the immediate west of our farm will be significantly covered in turbines, causing loss of visual amenity and views across the landscape.</p> <p>Shadow flicker across our proposed camp sites will make this opportunity impossible to fulfil, causing us to lose this opportunity to fulfil farm and business plans, increase profitability and increase economic activity in our region.</p>
Noise and vibration	<p>The farm residence will be affected by noise, vibration and infrasound as the prevailing winds come from the west – the direction of the proposed development. Noise and infrasound will directly impact the bedrooms of the residence, causing sleep disturbance to management, their family members and visitors.</p> <p>This has the potential to impact mental health, effectiveness at work and overall health and wellbeing. As a business we are legally required to ensure Work Health and Safety of our managers and directors. Without assurances that shadow flicker and noise will NOT impact the residence, we cannot guarantee they will be safe from these impacts and may need to take legal action should these impacts affect our business.</p> <p>A noise logger was placed at the residence, but on the opposite side of the house to where the project will be located. We are unsure of the reasons for this placement, but argue that it could be a deliberate attempt to skew the data.</p> <p>Management are members of a local concerned group (Friends of Kentucky Action Group) who have engaged an independent consultant to review the Neoen noise study contained in their EIS. Please refer to that assessment for further</p>

	information.
Biodiversity	<p>The proposal is located on Critically Endangered Ecological Community and has triggered the EPBC Act (1999).</p> <p>Many threatened and endangered species have been found on site in the EIS. Indeed, our own property is also home to areas of the same Critically Endangered Ecological Communities and the many endangered and threatened species they contain, including koalas.</p> <p>Prof Nick Reid at University of New England worked with graziers and Southern New England Landcare from 2002-2005 on the "Land, Water & Wool Project". The research concluded that profitable wool production is possible while maintaining superior quality biodiversity on farms in our region. This is why we practice regenerative agriculture techniques across our property. Regenerative techniques allow us to run our grazing enterprise while working with nature, improving the natural resources as we go, including sequestering carbon in our soils.</p> <p>'Kyabra' the main property where the proposal is sited, was involved in the research, and used to be a picture of health prior to the current ownership takeover.</p> <p>We ascertain that should this development proposal be approved, the biodiversity and natural capital on our own property will be negatively impacted. Wildlife including koalas will be killed, injured and displaced during clearing for construction, threatened woodland birds will be further threatened by blade strike during operation, and our it is unknown what impacts infrasound will have on many native birds and animals who are usually much more sensitive to sound than humans.</p> <p>Neoen's suggestions in the EIS for how to 'encourage wildlife to move on' from habitat trees that will need to be removed is bordering on criminal. As farmers, we are subjected to strict laws regarding the health and welfare of our livestock. If a farmer was caught 'shaking' a tree with heavy machinery causing wildlife to fall to their death or sustain serious injury, we would be investigated by the RSPCA and charged. Why are developers exempted from this cruel and unacceptable treatment of Australian wildlife?</p> <p>Critically Endangered Ecosystems should be protected and nurtured. Our natural capital and our economic futures depend on them.</p>
Traffic and transport	<p>This project will cause massive disruption along New England Highway which is our only route in and out of the property.</p> <p>The noise and dust generated by the extra traffic and construction will impact the farm residence which is relatively close to the highway, as well as the health and well-being of livestock. As a result, farm productivity is likely to be negatively impacted.</p> <p>The time taken to transport our livestock to market will be significantly increased. For every hour livestock are on transport trucks, they lose weight, reducing the price we receive for our product. The likely economic impact to our own business and the rural economy is unacceptable.</p>
Aboriginal cultural heritage	<p>We believe the study of cultural heritage was inadequate and did not properly involve the appropriate members of the Anaiwan and Kamilaroi nations.</p> <p>During 2019, we conducted a farm walk on our own property (right next door to the proposed wind farm site) with an Anaiwan man.</p> <p>It was surprising to us that the indicators of cultural significance are not only indicated by 'artefacts'. Cultural significance is 'read' by first nations people through 'signs' in the landscape and there were many on our own farm. We feel the EIS does not adequately address what is likely to be on the proposed site, as it has largely ignored this type of study of the landscape.</p>

	<p>We note also that the proposed roads are located across and beside areas where artefact scatters are found. It is unacceptable from a cultural heritage point of view that these will be destroyed or removed.</p>
Aviation safety	<p>Lights are likely to be required by CASA on the towers. These will impact our farm residence, including management and their family given the bedrooms are on the side of the house facing the proposal. Again, work health and safety is a consideration from a business perspective.</p> <p>We note that the Westpac Rescue Helicopter operates to a significant degree on this section of the New England Highway. It is not uncommon for there to be a significant highway collision on a weekly basis on this section, which is halfway between Sydney and Brisbane.</p> <p>The safety of the pilots, crews and patients will be at increased risk of collision with a wind turbine.</p>
Telecommunications	<p>The EIS indicates that television reception at our farm residence is likely to be impacted, as the signal comes from the Narrabri, on the far side of the proposal. This will make our farm residence less 'liveable'.</p> <p>We note that out of the 24 organisations Neoen is obliged to contact regarding telecommunications impacts, they have failed to make initial contact with 8 (33%), they have had no response from a further 14 (58%), have received a partial response from 1 (4%) and a response indicating a negative impact from 1 (4%).</p> <p>We argue that due diligence to ensure that farm business telecommunications is not interrupted has not been undertaken.</p> <p>Our farm residence operates completely on the mobile network including for the home phone and internet due to impairment of the underground copper wires.</p> <p>Uninterrupted mobile and internet service is a must at the farm residence in order for our farm business to operate, and for management to access internet for school age children and entertainment.</p> <p>At this stage, there is no assurance that this service will be maintained.</p>
Electromagnetic field levels and Health	<p>High levels of EMF will be associated with the proposed infrastructure. Bimbi Pastoral Pty Ltd has a duty of care as a business to ensure that work health and safety are maintained for management at their place of work (and in this case, residence). Based on the EIS, we are not assured of this.</p>
Bushfire	<p>The proponent's research into the ability to adequately conduct aerial fire-fighting in a bushfire prone area is inadequate.</p> <p>Fires impact our area mainly from the west, beyond the project proposal site and travel eastwards towards the project site and eventually our farm.</p> <p>However, the proposed project will be in the path of the fire, blocking our ability to seek aerial fire-fighting support.</p> <p>As a consequence, our managers, our farm, assets and livestock, will be at risk. We are not assured that the proponent is considering its duty of care to ensure that lives and businesses are not put at risk as a consequence of its actions.</p>
Water and soils	<p>Inadequate attention is paid in the EIS to how the proposal will impact ground water flows on local farms. Our farm business depends on ground water in dry and drought times to ensure livestock health and welfare and support farm productivity. We are not assured that ground water quality and quantity will not be impacted by the large volumes of concrete embedded deep into the surface of the landscape.</p> <p>This proposal will degrade soil and water resources over a significant portion of NSW owing to it being located in the relatively clean upper reaches of the Murray Darling Basin.</p> <p>Numerous federal government grant programs incentivise communities to</p>

	<p>improve water quality of streams and rivers in the Murray Darling system.</p> <p>This project is counter to the principles of those incentives in the following ways:</p> <ol style="list-style-type: none"> 1. Soil erosion resulting from overland flow on large areas of unprotected bare ground caused by significant construction on highly erodible meta-sediments and granite soils on sloping land. 2. Overland flow will take sediment (sand, silt, clay and organic matter) into streams in the upper reaches of the Murray Darling system. 3. Reduced water quality for downstream ecosystems and rural communities due to turbidity and lowered oxygen levels, impacting regional and remote community economies. 4. Increased potential for massive fish kills as seen at the end of the drought, impacting Australia's international reputation. <p>The project will also consume immeasurable quantities of local potable water for use in the concrete turbine bases. Our local area is not able to support this level of potable water use.</p> <p>The project will also consume vast quantities of gravel for the internal project roads proposed. Our local area cannot supply this much resource, meaning it will likely be brought in from other areas, presenting a biosecurity risk for weeds and disease, as well as increasing the 'mileage' and ultimately carbon footprint of the project. We run our business based on regenerative and sustainable principles. It is disappointing that a renewable energy proponent doesn't care to follow suit.</p>
Waste Management	<p>Waste management is a concern for local businesses.</p> <p>Will the proponent be contributing a fully costed decommissioning bond, including CPI increases, as well as a fully costed bond to local governments for waste management? Or will local businesses like our own be subsidising this large foreign entity when the time comes to decommission their turbines?</p> <p>Will ground water be impacted by leaching of toxic materials from the concrete footings into the water table? Can we be assured that the bore located on our property which is a direct neighbour, will not be affected?</p>
Air quality	<p>Fine particulates from transport dust and concrete dust during the construction phase is likely to impact the residence on our farm and therefore its occupants. Again, work health and safety of our managers is a concern to our business.</p>
Economic impact	<p>For the reasons discussed above and below, this proposal is likely to have a negative impact on our productivity, our business bottom line and our local economy.</p> <p>Our land value is highly likely to decrease due to being located so close to a mega industrial scale development. In fact if both stages proceed, our farm will be surrounded and trapped by the development.</p> <p>Our ability to proceed with key aspects of our farm plan will be negated, as they rely on the quiet enjoyment of the landscape through camping and ecotourism in the regenerative agriculture space.</p> <p>Our local council will be left to foot the bill for excess water usage, excess gravel usage, road repairs, garbage disposal among other things, increasing council rates and impacting our business bottom line.</p>

Social impact	<p>As a business, we are concerned about the social impacts already evident in the community.</p> <p>The behaviours of the proponent, and their lack of adequate community engagement for this proposal has really divided our community.</p> <p>There is little to no social licence for the project to proceed, except among a few larger landholders who stand to receive hundreds of thousands of dollars in lease payments if Stage 2 of the project goes ahead.</p> <p>We are concerned that mega scale wind installations for our transition to renewable energy are NOT the answer – they are only going to cause ‘more of the same’ problems and exacerbate climate change impacts.</p> <p>Wind towers are already superseded technology. Community owned microgrids that bolster regional economics and keep the profits in Australia are the answer and are much more likely to support all manner of small businesses in rural communities, like ours. This system would be more fair across more of the community, avoiding the haves and have nots that is currently dividing our community.</p>
Cumulative impact	<p>The EIS for this proposal does not address cumulative impacts adequately as outlined in the legislation.</p> <p>The cumulative impacts of the 590+ towers proposed within a 70 km radius of Walcha (only 40 km from our farm) will negatively impact our business and our future business plans.</p> <p>Our beautiful New England region will be transformed into an industrial landscape full of negative visual impacts, noise impacts, air quality impacts, water quality impacts, transport & telecommunications infrastructure impacts, social impacts, economic impacts, biodiversity impacts and amenity impacts.</p> <p>This is unacceptable to us as a business because there is a better way to transform to renewables that does not impact in this way.</p>
Community consultation	<p>Our business has not been consulted as a direct neighbour of the project. We understand that by rights, we should have been. As a consequence we have not had the opportunity to voice our concerns or ask specific questions about the impacts of the proposal on management.</p> <p>Neoen’s approach to community consultation is an insult to our business intelligence.</p> <p>Our local community group has written to the Department and the Minister for Planning on two occasions to complain about Neoen. Please refer to that correspondence. They do not satisfy the ‘fit and proper’ test to conduct business in our community in our opinion.</p> <p>In summary, Neoen has:</p> <ol style="list-style-type: none"> 1. Failed to construct an adequate community engagement plan. 2. Confused engagement with consultation. 3. Employed a community engagement officer who has no experience in the role. 4. Employed a community engagement officer who has a major conflict of interest - her extended family members stand to become wind farm hosts. 5. Failed to conduct meetings with impacted direct neighbours, despite being requested to do so by those neighbours (our family included). 6. Failed to respond to a letter my husband and I sent them more than a year ago requesting a meeting to discuss our concerns and our requirements should this project go ahead. 7. Conducted ‘drop in’ sessions at inappropriate venues (more than 40 km from some impacted community members) and at inappropriate times (during covid restrictions)

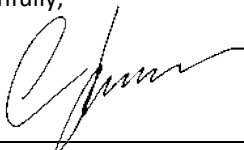
	<ol style="list-style-type: none"> 8. Refused to conduct a public meeting in the lead up to their EIS submission to raise awareness and knowledge of the project, despite being requested to do so by the community. 9. Failed to enable the community to ask questions in a forum setting so that community members benefit from the questions asked by others. 10. Consulted an organisation at Guyra, more than 100 km away, but not with the local branch of the same organisation. 11. Conducted a zoom meeting online as part of their 'community consultation' with very short notice, and very poor attendance from community members due to the lack of internet access and computer use in our community. 12. Provided inadequate answers to questions at the abovementioned zoom meeting and then muted myself and another member of our community so we could not ask further questions or clarifications! 13. Failed to upload all minutes of the Community Consultative Committee meetings to their website. 14. Blocked their Community Consultative Committee from consulting with the community. Our local community group was refused a meeting with members of the CCC. Their written response stated that it wasn't part of their role to speak with our group. 15. Failed to have an office location in the local community. 16. Deliberately confused the community by breaking the project into Stage 1 and Stage 2, part way through the process. 17. One direct neighbour's house is not included on the mapping, indicating that they have not been considered at all in the community consultation process, the neighbour agreement process or the noise and visual assessments! <p>A few years ago, Neoen was 'run out of town' by the Arding community not far from here for similar inappropriate and bad behaviours.</p> <p>As proper community consultation is legally required under the legislation, we trust the Department of Planning will undertake due and just process.</p>
Human and livestock health	<p>Anecdotal evidence points to infrasound becoming the new asbestos.</p> <p>Until adequate research is conducted that concludes no impacts on humans and livestock, we are not assured that this development proposal will not impact the physical and mental health of our managers and livestock.</p> <p>The Bald Hills Wind Farm supreme court case in Victoria is a case in point, and indicates that planners need to be much more vigilant about the impacts of these large developments on communities and businesses in rural and regional areas.</p>

We maintain it is not acceptable for the proponent to use *our* property as *their* buffer zone.

Wind turbines are already being superseded by better, less impactful technology. It is illogical to install old technology especially when it will leave an irreversible impact on the environment and the community.

We trust that NSW Planning the foresight to reject the Thunderbolt Wind Farm proposal and demand a better approach that involves the community, local businesses and has significantly more social licence.

Yours faithfully,



Craig Zirkler, BSc (Geo) Hon.
Director, Chairman



Karen Zirkler, BSc (Env) Hon 1.
Directory, Secretary