

NSW Department of Planning  
Sydney  
NSW 2001

17<sup>th</sup> May 2022

Dear Sir/Madam,

**Re: Thunderbolt Wind Farm SSD 10807896 Stage 1 Development**

I am writing to you to object to the development proposal for the Thunderbolt Wind Farm SSD 10807896 Stage 1.

I write this request as a local resident, and from a position of specialist knowledge, having worked for the NSW State Government for 15 years in a range of specialist natural resource management and environmental roles; and as a university academic who has taught a course in Environmental Impact Assessment for many years.

My objections relate to the following issues.

**1. Inadequate and superficial community consultation by the developer Neoen**

Neoen has conducted an extremely poor and deliberately limited community consultation process. Consequently, many residents do not understand the project, and have not had time to consider its impacts. Some of the direct neighbours to the development have never been contacted or consulted by Neoen.

Neoen claimed in their newsletter documenting the proposed division of the project into two Stages (issued on the 15<sup>th</sup> July 2021), that the reason for subdividing the project was due to concerns expressed by the community and local members of parliament, and to have more time to build trust with the community. Notwithstanding the apparent illogic of not having built trust with the community over the Stage 1 component, they are still proceeding with it in a rush.

Recent actions by Neoen have even further eroded this trust between Neoen and Kentucky community members, for example:

1. In two recent 'community consultations' conducted via Zoom between community members and Neoen staff and their Umwelt and Sonus consultants (on the 16<sup>th</sup> and 18<sup>th</sup> Sept. 2021), Neoen had designed the Zoom sessions so that community members were *permanently muted*. Thus, community members were only able to ask questions by typing into a chat box. Consequently, only Neoen staff and their consultants were able to speak. And of course, there was no discussion allowed, because we the community members, were muted. In all of my 30 years of conducting community consultations, I have never seen anything as inappropriate, manipulative and disempowering for the community as this Neoen exercise.
2. In their brochures promoting the September 15-18 2021 "drop-in sessions" at Kentucky Hall, Neoen promised that "*Neoen team members will be available online*

*during these times to answer questions*". Naturally Kentucky community members expected that during these times they would have access to Neoen's professional and technical staff, and Neoen's consultants. This did not happen. What attendees discovered was that the only person in attendance was Neoen's locally employed, non-technical, community liaison person and her husband, who we presume is also now a Neoen employee.

3. Neoen have continually refused to hold widely advertised public meetings with the community, where they can be interrogated by the community, and respond in an open forum – including refusing requests to hold such meetings on two occasions prior to the advent of Covid.
4. The local community group Friends of Kentucky Action Group, on the other hand, in March 2021, managed to hold a very successful public meeting at Kentucky Hall, which was attended by 85 people, to discuss community concerns over the wind farm proposal.
5. As many of our community members do not have internet access, online meetings are not an appropriate strategy to engage with the community. We have made this clear to Neoen, but they seem unwilling to adapt their strategy accordingly.

Until Neoen agrees to hold a widely advertised public meeting at Kentucky Hall, that is attended by Neoen technical staff and their consultants, and where community members can collectively question the technical staff in an open forum, they will continue to be seen to be avoiding true dialogue with the community. Their recent cursory attempts at community consultation involving the aforementioned, disempowering Zoom sessions, and a few drop-in sessions at Kentucky Hall run by a locally employed, non-technical, community liaison person, will not build trust with the community.

Importantly, Neoen cannot claim to have undertaken real and adequate community consultation with the local community prior to their submission of the Thunderbolt EIS Stage1 development application.

The Department of Planning has a responsibility to inform all developers that community consultations will be deemed inadequate until they are comprehensively conducted, and involve an opportunity for the entire community, in a participatory (and unmuted) manner, to interrogate the developer and their technical consultants face-to-face.

## 2. The soil erosion and catchment management assessment and mitigation provisions in the EIS are superficial and inadequate

As a former New South Wales government employee who held the specialised positions of soil conservationist and catchment planner, I found the soil erosion control, catchment management and hydrological assessments superficial and inadequate.

understanding of soil erosion potential is amateurish to say the least. For example, there is no consideration at all of the potential erosion that will be caused by 53 km of formed roads which will be constructed in highly erodible soils as a result of the development.

3. This the proposed development area is a high biological conservation value area, and is entirely inappropriate for tree clearing, road construction and windfarm development.

In this area there are significant koala populations, the presence of a Bells Turtle population, and threatened species and communities which are listed under Federal Government legislation.

The Thunderbolt Windfarm Stage I proposal has triggered the enforcement of the Federal Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) due to the presence of:

- listed threatened species and communities (sections 18 and 18A); and
- listed migratory species (sections 20 and 20A).

For this reason, additional SEARS required by the Federal government have been issued that Neoen has inadequately addressed in their environmental impact assessment and development application.

The development will involve substantial tree clearing, road construction, and fragmentation of habitat. There is little doubt that in 10 years' time the biological conservation value of this area will be severely and negatively impacted upon by this development, if it is allowed to proceed.

Windfarms are better suited to flat, treeless land of low conservation value, and should not be situated in undulating land with good tree cover, and high biological diversity and conservation value, as is this proposed development.

For these above reasons, I strongly object to the proposed Thunderbolt Windfarm stage 1, as this type of development is entirely inappropriate for this area.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Julian Prior', written in a cursive style.

Dr Julian Prior (Adjunct Professor, UNE)