

Name and address withheld

Kentucky NSW 2354

20 May2022

**Director – Energy Assessments, Department of Planning and Environment,  
Locked Bag 5022, Parramatta NSW 2124.**

**Thunderbolt Wind Farm application number SSD-10807896**

I wish to object to the proposed development of the Thunderbolt Wind Farm (TWF), by Neoen in the Kentucky area of New England in NSW.

I have listed the objections under a series of headings with supporting notes included.

The State planning process.

It is my understanding that the State of NSW declared Renewable Energy Zones (REZ) without any disciplined scientific planning process or community consultation. It seems that areas with high voltage power transmission lines running through them were the sole selection criteria. These were then offered to energy generation companies on an open door basis. The ensuing frenzy from potential energy development companies (nicknamed by some as 'wire rats') has been staggering. To the extent that existing, developing, and applications for future renewable energy facilities far exceeds the State endorsed cap of 8,000 MW for the NE REZ.

Then there is the absence of proper integrated State landscape scale land use planning. If it did exist then all the factors such as agricultural use, environmental significance, population energy demand and population (both human and animal) amenity would be prominent and visible. This would provide residents, potential hosts and developers with a much clearer understanding of possible expectations. A balanced plan would not only provide capacity limitations within a REZ but also density, distribution and size limitations so that no one area is completely swamped or surrounded by development.

Until proper research and planning processes are put in place then there must be a moratorium on state significant energy development. The appalling lack of planning and the behaviour of the development company have contributed significantly to community division and friction.

### NEOEN behaviour.

Initial community consultation seemed to be open and inclusive. Then the 'Confidentiality' and 'Non disclosure' type inferences came out in abundance. This further pitted the community against each other. The winner and loser syndrome between possible hosts, neighbours both near and far and the others in the community started to become apparent. This was when the project was being presented as one entity. Then probably because of mounting community requests for details and clarification, Neoen decided to split the project into two stages. This seems to be part of a larger strategy to get a foot in the door in the area with only two hosts, one of which is the majority in size and infrastructure and is I believe to be foreign owned. These actions appear to have the old 'divide and conquer' tactic in evidence.

Lack of consultation has also been apparent. Neoen has held several drop in, information style gatherings but advanced notification and competent company support has been limited. Restrictions because of Covid have also impacted on information exchange. However the most insulting engagement was when several members participated in an online (zoom?) event with Neoen representatives and they were muted from being able to make any contributions to the meeting. They were able to listen to the company blurb and that was it. Also until it was brought to Neoen's attention they didn't have a Community Consultative Committee (CCC), as required by the proposal guidelines. On appointment the CCC had 11 members, three of which represent Neoen, three from local LGA's and five community representatives. Of the community representatives, one is a possible host for solar panels in Stage 2 of the proposed development. Lastly there is the Chairperson, appointed and paid by whom? When the Chairman of our group enquired from the CCC Chairman about when they were going to hold community meetings he was told that it was not in their charter to hold such meetings. A similar enquiry from myself to another member of the CCC brought about the same response.

I also find the figures quoted in the EIS *Social Impact* section to be questionable. I was not aware of their on line survey (nor were many others I suspect) conducted from July 2020 to Oct 2021. How many participants were there? There are also many residents who don't have on line access. It seems to me that the rating system, being a figure out of 10, is misleading and an attempt to disguise or hide a non statistically significant figure. This being particularly important when no survey size in relation to the population size is given.

### Environmental Concerns

The proposed development is in an area that is declared "Critically Endangered" (Federal Govt EPBC Act 1999). How can it be that large scale industrial development can be approved in an area such as this? Neoen planning maps indicate that Koala habitat sites will be tower and access road locations. Then in the EIS they propose to shake the trees with heavy machinery to encourage the Koala's to leave and go and find some other place to live. Also

there is the proposal of providing offsets to replace the destroyed habitat. Where is it, how do the animals get there? To my knowledge animals can't read maps, perhaps Neoen will provide a shuttle bus service. The tower and road construction will cause significant habitat fragmentation, and an enormous increase in the "edge" effect which is known to be a fauna habitat killer.

The construction of massive tower foundations and the extensive road network will no doubt have significant effect on both surface and ground water movement. The construction of these assets will also expose the area to erosion and water siltation risks, because of the relatively fragile soils that exist in the area. It is just not a suitable development for this area.

### Amenity and Health

Proposed turbine tower heights of 270m+ have never been used on land before. Why here? Perhaps because the wind yield is not as good as it could be and the company needs to maximise the potential. But then they admitted that they had no noise data on turbines of this size. They also claim that noise is predicted to be below allowable noise levels; how do they know this? Wind generators do create noise as proven in the case against the Bald Hills Wind Farm at Tarwin Lower in Vic. In this case, the court ruled that they are to stop the nuisance noise being created by their wind turbines. Why should it be allowed anywhere near existing residents in the first place?

Some information indicates that noise does travel long distances, and then there are the questions surrounding infrasound and its possible effect on members of the community. None of these concerns have been addressed satisfactorily.

Visual amenity will be affected, and their statement that 'it is unlikely the Project would degrade the scenic value of landscape features' is totally wrong. People in the area live here for the amenity and lifestyle that it provides. To have an industrial size wind generation development imposed on them is in no way fair or reasonable. When building regulations in built up areas impose height restrictions etc to prevent neighbour view obstruction, how is it OK to impose a view on a rural dwellers that they do not want. Especially when the rural residents were already there and had no indication that these imposing developments would come into existence.

If Wind Turbine Generators (WTG's) and their operation are so safe and benign then they should be located much closer to large population and industrial areas where the largest electricity consumption exists. This would also be a huge plus in terms of electricity use efficiency by eliminating most of the losses incurred when moving electricity over long distances. Sounds like a State wide plan would be a good starting point.

There is also the problem of sunlight reflection flicker and shadow flicker, with the addition of possible red light flicker at night should lights have to be installed at a later date. In their

EIS, Neoen state that 'No non-associated dwellings are **predicted** to experience shadow flicker durations above the applicable limits.' What are applicable limits? Why should any existing resident have this annoying and potentially health threatening imposition forced upon them?

The whole proposal is full of vagaries, predictions and assumptions that are not substantiated and are supposed to be dealt with after the event by mitigation. This is not an acceptable development for the area and continues to cause considerable community division and ill will.

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