

20 June 2022

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

Dear Sir / Madam

**Objection to the proposed Valley Of The Winds Wind Farm project - State Significant Development Application - SSD-10461**

This is an objection to the proposed Valley Of The Winds (“VOTW”) Wind Farm project (“Project”) following review of the published Environmental Impact Statement (“EIS”). It is submitted that the proposed Project should be either refused or abandoned. Failing that, the Project should be refused in its current form, significantly revised and re-exhibited.

The flaws that are identified in this submission have come about due to an inadequate Implementation Plan for the Central-West Orana Renewable Energy Zone. Such a plan would have directed and guided wind farm proponents away from no-go areas and into sites that are more suitable. The NSW Government urgently needs to amend REZ implementation plans so communities like Coolah and the rural surrounds are not forced to comment on such poorly developed concepts. Such policy work would make future EIS proposals less costly and more efficient for all stakeholders. This in turn would assist the State of New South Wales (NSW) meet its objectives.

Objections to the proposed VOTW Project include:

- The specific impacts of the Project on Tongy Station, which are severe due to the proposed location of the Girragulang cluster of turbines:
  - The visual impacts as assessed in the EIS on the areas of Tongy Station and dwellings (7 – 12 inclusive and 283) are ill-considered, as further referenced below. The Girragulang cluster of turbines will dominate Tongy’s western skyline due to their physical elevation on the ridge line. As proposed the turbines will actually tower >350m above the Tongy landform and the occupied dwellings, thereby destroying the scenic value and ambience of the property. This is unacceptable. The rural landscape within and surrounding our property is vitally important to those that live and work within it and no assessment has been conducted in the EIS to assess the scenic value of our landscape, primarily because the NSW planning system is lacking in that it does not place any requirement to consider impacts to scenic value. Rather, the planning process calls for subjective assessments of visual impact, carried out by consultants using a reference system defined in the NSW Wind Energy: Visual Assessment Bulletin (DPE, 2016), which is outdated given the material increase of turbine height from 190 meters to the 250 meters turbines proposed. As such I believe the EIS assessment of scenic impact is flawed, as it does not consider scenic value of surrounding properties to the Project. The high scenic value of our properties is at risk of being materially diminished by the Project.
  - The rural landscape assessment methodology is flawed and should be revised, re-assessed and the results re-exhibited
  - The EIS fails to consider an additional dwelling within 2 km of the proposed turbines. This dwelling was previously burnt down, and plans are in place for replacement. Additional new working infrastructure, such as cattle yards, sheep yards and feed silos

are also planned to be co-located with the dwelling. The proposed turbines would significantly impact future operations on the western portion of Tongy which have been planned for some years. Visual, shadow flicker and noise assessments need to be undertaken for this dwelling and the surrounding workplace.

- The shadow flicker impact across the Turee Creek valley including large swaths of Tongy have not been adequately assessed. Moving and handling livestock which risk being impacted by shadow flicker is unacceptable and potentially unsafe for employees. Given turbine heights will exceed 350m across the adjacent Turee Creek Valley floor, the shadow flicker impact will well exceed the 30 hours per year stated in the EIS.
- The noise impact assessment clearly states that all people living at, working at, or visiting Tongy will hear the turbines as they are currently proposed. The EIS predicts noise levels will be at least 25dB, and on a constant basis. Currently there is very little noise, other than occasional road noise from passing traffic, perhaps an overhead aircraft, combined with everyday ambient and intermittent noise common for rural farm land, such as birds etc. Imposing constant turbine noise on such a low to non-existent base is incomprehensible, particularly during the evenings when turbine noise would be expected to be the dominating noise.
- The EIS states the turbines will impact operations of the Tongy airstrip, both by proximity of the turbines to the circuit operations of the airstrip in addition to creating wake turbulence across the airstrip. The Tongy airstrip is a critical component to farming operations, particularly for use in applications by air. The airstrip has been in place for nearly 100 years and is the designated alternative airstrip to Coolah. The airstrip cannot be re-located on Tongy due to local topography. As depicted in the EIS, the proposed Girragulang cluster turbines will cause the airstrip to be unsafe and therefore will materially and negatively impact agricultural operations of Tongy Station in addition to preventing use by my neighbor who depends upon it, as well as use by other operators and availability for emergency services (such as Royal Flying Doctor Service). The technical assessment relating to airstrip impacts is flawed and further consultation and assessment is required. These gaps raise serious safety issues. The only remedy is removal of the offending Girragulang cluster turbines.
- The EIS assessment on flora, fauna and biodiversity is simply inadequate. Not enough local assessment has been completed in regard to aerial fauna including for the endangered Swift Parrot and for the protected Wedge Tail Eagle. The Swift Parrot is known to be contained in the district and pairs of the Wedge Tail Eagle are commonly sighted on Tongy. The EIS needs to fully consider areas surrounding the wind farm project (as opposed to only within and immediately adjacent to the Project boundary) and once these areas have fully recovered from the 2017 Sir Ivan bush fire.
- The existence of the Girragulang cluster of turbines will prevent aerial fire fighting by fixed wing aircraft for the Tongy locality. Fire fighting air services were a critical part of the attempts to contain the Sir Ivan fire in 2017. As an example, in this case the NSW Rural Fire Services prevented ground units entering the Turee Creek valley locality during the fire, such that only aerial fire fighting could continue. Helicopters are useful in spotting fires and protecting buildings assuming they have unfettered access to dams for replenishment. But only fixed wing aircraft can contain large fire fronts and they need to operate from the nearest suitable airstrip. The task is difficult enough due to smoke and wind - adding the proximity of transmission lines to the operating risk cannot be allowed. Consequently, it is submitted that by interfering with safe aviation operations the Girragulang cluster of turbines will increase the risk of bushfire in the Tongy locality, which is unacceptable.

- The impacts this Project, and related infrastructure, will have on the Coolah area and general lack of information as to related transmission infrastructure related to this Project that is being contemplated by NSW Government authorities. Such impacts include:
  - The cumulative visual impacts on the Coolah district from the combination of the VOTW Wind Farm and the Liverpool Range Wind Farm, and the major new powerline assets, are so severe that the Project should be abandoned. Each of the 371 proposed turbines which will completely surround Coolah are nearly as high as the Barangaroo building which towers over Sydney's CBD; almost double the height of Sydney Harbour Bridge. This is way too much concentration of the world's largest on-shore turbines for the Coolah district and is a further example of the poorly conceived implementation plan for the Central-West Orana REZ.
  - It is inappropriate to locate the World's largest land-based wind turbines in this location. Any turbines that are approved for the Coolah district should be significantly reduced in height and scale.
  - Meaningful photo montages or best available 3D imagery should be completed by an independent expert (and not conducted by the Project) for all non-associated properties as well for public viewing vantage points, such as the Coolah look-out on the Cassilis/Vinegaroy Road and along Tongy Lane. There are nil 250 metre high turbines in Australia, and a total lack of familiarity by the community as to their scale. Montages and/or 3D imagery should also include any contemplated transmission lines in the area whether by NSW Government or the AEMO.
  - The high voltage powerline proposal is incomplete and disjointed from the EIS approval. Information on the Project should be updated following the closure of community consultation and re-exhibited as a complete and coherent package before the application is determined.

Given the short period to study the thousands of pages of exhibited material the right is reserved to make additional submissions after further consideration and after the proponent undertakes further technical and project reviews to address the issues raised.

You would be welcome to a more detailed briefing or answer to any queries raised in this submission as the proposal would affect Tongy Station and the Turee Creek Valley and any proposals for high voltage transmission lines.

Yours sincerely,

M.E Baillieu