



Executive Summary

This Submission tables on behalf of the Community the Voice for Walcha's (VfW) **Group Objection** to the Winterbourne Wind Farm Project (WWF). The full reasons for the Community Objection are set out in the eleven (11) sub-submissions attached hereunder.

The objective of this Executive Summary is to provide important context supporting the Objection rationale to;

- Provide a short overview as to the grounds for objection set out in the Sub-Submissions; and
- Convey on behalf of the Community their expectations as to what presents as just and equitable outcomes in the ongoing assessment process.

Context of course is everything - in the Project at hand it attempts to draw together analysis – often complex and introducing serious issues facing a community. Issues which will test the fabric, the understanding and ultimately the resilience of the Community. It shouldn't be underestimated that the prevailing psychology in the Walcha Community is that this Project and those that follow – could present as the turning points, between either Walcha continuing to grow as a progressive agricultural economy contributing to Australia's national and export objectives or an industrial waste land – a 'host-baby sitter' for concrete and carbon fibre' purely for profit objectives.

Threshold Objections

The Sub-Submissions hereunder promote detailed consideration in each of its 11 assessments outlining 2 shortcomings – firstly, failure to achieve compliance and/or secondly, excessive and unacceptable impacts. Some of which are critical. Each attempt is to substantiate **why consent should be withheld** for the Project. Much of the basis for this conclusion is derived from the following threshold technical conclusions reached by VfW;

- a) The considerable project Impacts and the mitigation offered don't confirm as ecologically sustainable development in accordance with the Objectives of the NSW Environmental Planning and Assessment Act 1979.
- b) The Project impacts on the UNESCO Gondwana Rainforest and Wilderness Area and the rich biodiversity do not justify approval by the Federal Minister of the Environment pursuant to the Environment Protection Biodiversity Conservation Act 1999.
- c) The Proponents presentation of the EIS is **unacceptably deficient in project detail -it presents with numerous errors and misleading information**. It's content and technical detail is clearly not in compliance with the EPA Act 1979 and Schedule 2 of the EPA Regulations. Nor does it reflect the standards espoused by the State Significant Development Guidelines July 2021 and the Preparing an Environmental Impact Statement Guidelines -July 2021.

VfW maintain four considerations arise in respect to this deficiency;

1	Obvious questions as to procedural fairness arise for the Community and others who were severely impaired in their opportunity to assess the merits of the Project through this EIS.
2	The Proponents obvious failure to give serious consideration to analysis 'of any feasible alternatives 'to carrying out the proposed WWF development activity...' in accordance with the SEAR and <u>Schedule 2 of the EPA Regulations</u> .
3	The failure in preparing the EIS to ensure the requisite high standards, including the potential proffering of misleading information, as specified by the <u>Clause 3 of the EPA Regulation</u> and the July 2021 <u>Guidelines</u> . This questions the integrity of REAP Certification as to 'completeness, accuracy, quality and clarity 'of the information, submitted with the EIS and signed off by the Developer's REAP; and
4	The VfW must be clear the EIS in its entirety should be rejected as fundamentally flawed and clearly not a project which draws any support from a public interest perspective.

Background to Voice for Walcha

VfW is an incorporated community entity – it draws its enablement as a '**voice**' from its active engagement with the Walcha Community.

Over the last 18 months, VfW have held 3 community meetings/forums, with in excess of 200+ people showing up to each event. Each time the proponent has been invited to attend – on all 3 occasions they have been a no show.

This community has volunteered over 1000+ hours of time reading, digesting, and communicating our findings back to the local community. Through this we believe over 1000+ people in the community are aware of what we are doing, with over 80% of these supportive of our objections.

So please be assured from the drop-in centre, street stalls, community forums, community surveys, print and electronic media .. the ***Voice for Walcha has listened - it has advised - and it has represented the Community.***

Context to Objections

The context relevant for this Executive Summary can be extracted by way of a brief 4 x 'Ps' analysis - the **Principle** – the **People** – the **Process** – the **Project**;

1. The **Principle** – the project proposition contemplates several principles of note;
 - **'Positioning profit before people'** in a rural regional context induces a very low tolerance. This is a common conclusion whichever way you contemplate this project. The Community is not gullible – it appreciates the economic nirvana on promise is a political illusion, barely salvageable beyond the construction period. It is frivolous in this context to play, as a point convenience, the *'saving the planet card'*. There are 1001 ways to demonstrate to this commitment. It becomes even more amoral when the Project 'throws under the bus' the rights and obligations to First Nations People and the preservation of endangered biodiversity and wilderness assets; and
 - **'You can't give effect to economic transitions, particularly energy, without solid strategic land use planning'**. The energy transition requisites for prominent deployment of renewable energy infrastructure in rural -regional Australia. **Yet there is an absolute dearth of strategic land use planning.** It is patently obvious the WWF's size and its placement next door to the UNESCO Gondwana Heritage asset was a lamentable planning ambition of some proportions. This should have been subject to scrutiny at the scoping stage.
2. The **People** – Walcha presents a successful community with a strong social order -people grow up there and stay – people leave, and many come back – and new residents are attracted to the town. Walcha is an educated community and is very successful in its agricultural pursuits – fine wool, lamb and beef being its obvious contributions. As such it gets climate change and the need to decarbonise energy supply through renewable energy. However, if Walcha and similar rural communities are expected to do the heavy lifting for the urban classes then it reserves the right to have a strong say in what energy infrastructure goes where and when. If the ambition is **social licence** – than there is a reasonable expectation as to *'meaningful consultation'* and *project acceptance*. This requisites transparency of process from originators such as Walcha Energy and more respectful inclusive development practices from the Developer. It would appear both were unfortunately in short supply.
3. The **Process** – The Community are concerned that the State Significant Development Planning Pathway has deteriorated into a pro-development 'tick the box' – planning by process. Unfortunately influenced by political judgement. The Community feels isolated by a 'city centric' Government struggling to give more than 'lip service' to the meaning of social licence. The Community instincts are such that it perceives the developer is comfortable or even perhaps smug in a feeling that the system is weighted in their favour. All they need to do is 'tick the requisite boxes' and consent will eventually materialise.

VfW would like to debunk this notion by at least holding the Developer to account – the Government could assist in three obvious ways.

 - Firstly, promoting a more robust planning assessment process. This requisite as the Community has done for more independent technical expertise.
 - Secondly, by avoiding denigrating this Community's concerns to the Project as *'just another contribution to the NSW Wind Wars'* – a continuation of all the troubles which beset the Communities on Southern Highlands -Tablelands 2012-2015. In perspective it's one of the largest wind developments proposed for NSW and its contemplating massive infrastructure which has not been deployed anywhere else except Finland in 2023.
 - Thirdly its profiles, against an increasing project pipeline in the Southern New England, inducing a cumulative impact of some magnitude. This outlook needs urgent and independent review.
4. This **Project** – stepped off on the wrong foot – the development rights were secured from profit driven originators – whose site acquisition methodologies were **secretive**. Questionable development supports were facilitated during the 'big drought' when targeted host landowners were in survival mode - attentions diverted trying to keep their agricultural interests alive. Host landowners **were gagged** from disclosure to the wider community. **So, 'transparency lite' and the genesis of a community division.**

From the Developers perspective the acquisition offered the opportunity to meet its core strategy as a turbine salesmen – selling more turbines (120) and securing more O&M servicing contract and potentially for 62 years (options for the life of the Project). Openly there is no intention by the Developer to hold the Project – therefore the development downside – of even a basic accommodation of Traditional Owners, of mitigating biodiversity damage, of minimising turbine noise etc **is obviously of second order** importance to the commercial imperative of moving on and profit maximisation.

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Sub-Submissions - An Overview

The VfW on behalf of the Community have carefully reviewed the EIS Impact Assessment – and it is helpful if we offer in the following schedule a brief overview of the **eleven (11) objections** raised in the Sub-Submissions hereunder.

THE IMPACT	V4W BROAD OBJECTION /S
Part A Lack of Consultation	<p>Demonstrably a failed process and a breach of the principles and protocols underpinning Community Participation pursuant to the EPA Act and Guidelines. Lack of genuine interest in meaningful engagement – largely ‘tick the box’ process and seemingly in conflict with the more modern governance such as the EII Act.</p> <p>Presents with a strong consultation focus on keeping pecuniary host landowners on board. Any analysis of attendance numbers presented by the Developer confirms the absolute paucity of commitment or interest to meaningful consultation with the wider community.</p>
Part B Cumulative Impact	<p>The Developer presents a convenient and misleading interpretation as to study area. It deliberately ignored the tsunami of projects surrounding WWF – all in feasibility assessment and well known to the Developer. A more bona fide assessment would reveal what the Developer was hiding from view – the significant compounding impacts on the Study Area for years to come.</p>
Part C Decommissioning	<p>A clear avoidance of land stewardship responsibilities – no interest or intention on site rehabilitation.</p>
Part D BDAR	<p>A lamentable and environmental immoral dismissal of their development responsibility to critically endangered and vulnerable biodiversity species. Obvious serious breaches of all relevant Federal and State laws. Presents as serious compromises to treasured UNESCO sites and Wilderness Sites. A serious breach of public trust and public interest.</p>
Part E Roads and Traffic	<p>Interpretation of the Traffic Impact Assessment (TIA) presents as a horror story as to impact profile – as serious incompetency as to assessment in errors and omissions. The naivety and ignorance of the Impact Assessment offered by Developers beggars’ belief for such a serious threat to life and well-being of Community.</p>

<p>Part F Soils and Water</p>	<p>The Impact Assessment proposition by the Developer presented as a ‘B’ grade scoping proposal reflecting very poor assessment and data. It was virtual impossible to offer meaningful assessment. Gravel and Water resources either ignored or not yet on the Developers to do list. An appalling dereliction of their EIS responsibilities.</p>
<p>Part G Health</p>	<p>Aided by expert peer review -it was very disturbing to discover just how reckless and misleading the Developer had been on noise assessment. Effectively by deploying poor monitoring and inefficient manipulation of data, the Developer appears to understate the noise impacts across the Project footprint by up to 14dB. Significant – a correct and conservative approach would confirm many Associated and Non Associated residences maybe far more exposed on noise impacts than the feeble and fragile EIS promoted.</p> <p>In addition, the Assessment process remains oblivious to the obvious mental health anguish the ‘divide and conquer ‘methodology has induced. Please see sub-mission analysis</p>
<p>Part H ACHAR</p>	<p>The Aboriginal Cultural Assessment Report was an appalling and disrespectful to the Traditional Owners -the Wolka Dunghatti Bari. The Developer’s consultants offered the bare minimalist attempts to engage the Dunghatti – they deployed culturally insulting survey processes and associated methodology. The ACHAR is so flawed is it rejected by the Dunghatti out of hand. The Community supports that response 100%.</p>
<p>Part I Visual Amenity</p>	<p>The development proposition to install massive 230M 6.2 turbines on rural ridgelines in a rural setting induces obvious images. Try as the Developer may with landscape artistry and other magic they can’t be distorted to present as visually inconsequential. The tools of the trade to distort reality are well recognised.</p>
<p>Part J Socio-Economic</p>	<p>The SIA on offer failed to a paint rosy picture of social harmony and opportunity from a largely text box academic desktop analysis. It presented as an essay on utopian rural ‘la la land ‘– devoid of reality.</p> <p>It would have been helpful if the social commentator actually visited Walcha.</p> <p>Simarily the Economic analysis tries to paint an illusion that the development will induce a new economic nirvana of jobs and new wealth. It ignored the reality of available skill sets in Walcha – lack of accommodation and the reality fact that construction comes and goes and yes a sugar hit for the pub and the cake shop but then what?</p>
<p>Part K Hazards and Risks</p>	<p>The EIS seems simply ignorant of the fundamental point most expert fire experts agree on – wind turbines don’t mix with aerial firefighting full stop.</p>

In conclusion the more time the Community spends on reviewing this EIS with all its errors, omissions and misrepresentations, the more obvious its instincts are confirmed. **The Project in reality is a turbine sales and O&M transaction masquerading as a low-cost development proposition.** The ambition of the Developer is to use the convenience of the process ‘tick enough boxes’ to secure consent and move on leaving the Community left behind holding the industrial legacy.

So, if we are going to embrace an EIS as the cornerstone of the planning systems then let’s give it meaning. Let’s hold the Developer to account to more professionally discharge their EIS *impact and assessment* responsibilities. In doing so validate **why the Project is supersized** and **why its parked where it is?**

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VfW looks forward to publishing its submission for the Community and others – we would welcome questions and comments. VfW reserves it right to make further comment in the process before DPIE initiate their assessment process.

Thank you for accepting our submission for consideration and comment.



23 January 2023