From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Tuesday, 14 November 2023 6:37:59 PM

Submitted on Tue, 14/11/2023 - 18:37

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Narelle

Last name Dotta

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2529

**Please provide your view on the project** I object to it

## Submission

Windmills and transmission lines should not traverse or be near existing residential areas. There are health and well-being as well as environmental negatives.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 15 November 2023 6:39:00 AM

Submitted on Wed, 15/11/2023 - 06:38

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Jim

Last name Bowman

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Mudgee

**Please provide your view on the project** I object to it

## Submission

I am opposed to these projects for many reasons.

Many of them are on premium agricultural land such as Wellington solar farm.

The politicians tell us that it is virtually free power once they are built. This is rubbish as the mostly foreign owners will want a large return on their investments.

What is the point of spending billions of dollars to replace a what was a great and reliable energy system and grid.

The biggest mistake that was made was allowing private rooftop solar to undermine the base load providers of electricity. They are a play thing for the better off people and leave the poor who can't afford solar to maintain the grid.

Renewable energy leave us at the mercy of China to provide these systems and they won't have our best interests at heart.

I don't know what council rates these places pay but they should be the same as industrial building in town as they convert farm land into industrial land. Can they compete if they

paid their fair share of rates. We would be much better to go nuclear and some fossil fuel with carbon capture and solar if needed.

# I agree to the above statement

Yes

From:	Planning Portal - Department of Planning and Environment
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 15 November 2023 8:20:45 AM

Submitted on Wed, 15/11/2023 - 08:20

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Tertia

Last name Butcher

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Booroorban 2710

**Please provide your view on the project** I am just providing comments

# Submission

SW-REZ

I do object to wind turbines being too close to highways along SW-REZ.

They will be a blight on our plains landscape, our big skies and wide horizon. Hay has become a tourist destination and our farmstay operation (Burraburoon Farmstay just off the Cobb Highway) hosts guests from Sydney, Canberra and Melbourne who specifically want to escape to the country; to nature, big horizons and a lot of "nothingness".

There are 3 windfarm proposals for our Hay-Booroorban district.

Our farmstay business is likely to close down if one of these is approved as the turbines planned will be very close along the Cobb Highway; on both sides of the road; turning the long stretch of straight road into an industrial-looking park.

There are a further two proposals (Pottinger Park and Bullawah) which will not affect our

business, nor the tranquility of the Hay Plains as they will be set well off the highway. As Burraburoon is not a 'close neighbour' to the large-scale project, I understand there is no compensation offered for a business likely to be adversely affected.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 15 November 2023 10:31:59 AM

Submitted on Wed, 15/11/2023 - 10:31

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

## Name

**First name** Gary

Last name Verri

I would like my name and personal contact details to remain confidential No

## Info

Email

**Suburb/Town & Postcode** Willsons Downfall 2372

## Please provide your view on the project

I am just providing comments

## Submission

There is nothing environmentally friendly about wind or solar or unwarranted transmission lines. The amount of land that has to cleared of vegetation is staggering, each wind tower requires 25ha clear of trees and are usually in places agriculturists wouldn't clear, each solar panel requires 10m2, transmission lines depend on the current they are expected to carry as to the clearing required and will go into areas that would never be cleared for any other purpose except in rare instances (mining). This is without taking the mining of rare earths to make part of the equipment required for solar panels, to obtain some of the necessary minerals it requires 6–8 times of mining required for coal fired power stations. Australia would be far better off building H.E.L.E coal fired power stations and using existing transmission lines. Australia should also be looking at the nuclear option building nuclear power stations to utilise the existing transmission network, another option we haven't even considered is high temperature waste 2 energy using this energy makes a lot more sense than burying it ! Or carting it around the country at great expense

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 15 November 2023 10:34:32 AM

Submitted on Wed, 15/11/2023 - 10:34

Submitted by: Anonymous

Submitted values are:

Submission Type I am making a personal submission

# Name

**First name** Paul

Last name Brady

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2529

Please provide your view on the project I support it

## **Submission**

\* We need to reduce our carbon output.

\* Industry will soon close polluting coal-fired power stations.

\* We need a low carbon replacement and wind energy is one way to do this.

\* I support the proposal and am not concerned about whales dying, they won't; fishing

being diminished, it won't; turbines being an eyesore, for the most part they won't be seen. \* The experience from overseas has taught us that off shore wind turbines will generate the power we will need for the future with little environmental impact.

\* I am disappointed that some politicians are spreading misinformation and lies for political gain. Whatever happened to truth?

\* It is also disappointing that some media outlets are amplifying these untruths.

\* The production, placement and maintenance of off shore wind turbines will produce jobs which will last for years and be of great benefit to the whole community of the Illawarra.

\* I say, go ahead and build them. ASAP.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 15 November 2023 7:29:45 PM

Submitted on Wed, 15/11/2023 - 19:29

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

## Name

First name Peter

Last name WILLIAMS

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Farmborough Heights. NSW 2526

**Please provide your view on the project** I object to it

## Submission

I object to the construction of extensive wind farms and copious solar farms across New South Wales.

My reasons include...

a) Australia's carbon dioxide emissions are extremely low at present, and the main arguments for these forms of energy generation is to lower our carbon dioxide emissions. The cost-benefit, estimated to be at least a trillion dollars plus, is not justified, in my opinion. According to Australian scientists like Professor Ian Plimer, 96% of the Earth's total carbon dioxide emissions comes from Nature. 4% of the Earth's total carbon dioxide emissions comes from Nature. 4% of the Earth's total carbon dioxide emissions comes from Nature. 4% of the Earth's total carbon dioxide emissions comes from Nature activity in Australia is approximately 1.3% of that 4%. That means human activity in Australia creates 0.0052% of all the Earth's carbon dioxide emissions (1.3% of 4% = 0.0052%). That is a minuscule amount of carbon emissions. This level of emissions is at a time when we still are using coal and gas to generate reliable power 60-80% of the time. (Professor Ian Plimer is the

author of several books about the environment in Australia, including 'Green Murder'.) By extending the amount of vegetation on our landscapes and protecting our water plants in our fresh water and sea scapes, including seaweeds, kelp, phytoplankton, sea grasses etc., we are able to naturally lower even further, our carbon dioxide emissions, as plants and trees capture carbon and emit life giving oxygen, through photosynthesis. Traditional conservationist have been telling us for a long time the importance of planting trees, bushes and grasses. By planting more crops, fruit trees, grazing grasses, rehabilitating barren lands and protecting bush lands and forests etc., we will be not only putting natural carbon capturing plants to work, we will be providing habitats for our unique birds and animals.

Thus we do not need expensive overseas made copious wind farms and millions of solar panels if we keep using our present mix of power generation systems, in my opinion. Koala cannot live on wind turbines and kangaroos will find it hard to eat grass on cleared land that will probably sprayed with herbicide to keep the grass down?

To keep emissions low we should also look at developing nuclear power plants, that are presently being used in approximately 23 countries. If coal and gas is to be phased out this appears to be the next best option. We have plenty of yellow cake to make high grade uranium in Australia and we know how to safely dispose of the small amount of radio activity waste thanks to the work at ANSTO at Lucas Heights. With the development of the AUKUS nuclear powered submarine program, our knowledge and use of nuclear power will be advancing.

b) All the wind turbines and solar panels will need to be replaced in 10-30 years, perhaps sooner with weather and natural disasters like bushfires, floods and cyclones. Where are all the toxic solar panels to be dumped? Where are the massive 100+ metre turbine blades made of balsa wood and fibreglass to be dumped in NSW? Where are the plans to recycle these? In overseas countries most of these parts are just dumped and buried, because of the cost, and difficulty, in recycling solar panels and turbine blades. The dumping of these will take up valuable land.

c) Approximately 90% of solar panels and wind turbines are made in China. Even the solar panels made in Australia use about 60% of the materials made in China. After recent trade bans by China for dubious reasons, this country cannot rely on our power coming from a country that may cut off our power supply of parts and machines at any stage. Thus our power security is a stake, in my opinion.

d) To meet the renewables target of 83% by 2030 Australia needs to import, install and connect a wind turbine every month and 22,000 solar panels every day until 2030. Those machines need to be connected with something like 28,000 kilometres of transmission lines and transmission towers, sub stations, large battery back up systems, and service roads that will cut through and affect productive farming lands and natural bush lands. By using the present transmission networks coal and gas power stations can be changed over to say hydrogen gas and nuclear at a later stage. The pumped hydro scheme Snowy Hydro 2.0 is way over budget and over 2 years behind its original completion date.

e) Renewables, no matter how many you have, cannot guarantee power 100% of the time, because they are dependent on the weather. Even hydro power depends upon water supply, and it can clash with farming irrigation needs, especially during droughts. Coal, gas and nuclear power can guarantee cheap power 100% of the time.

The renewables target thus doesn't seem to be on target, and our state maybe running out of power, especially if other states and territories, on the National Grid, are failing to meet their targets.

e) The visual impost of thousands of solar panels, wind turbines, power lines, transmission towers, battery back up systems etc., across our landscapes and seascapes could affect our tourism industries, and as we have seen already, there have been protests already on our North Coast and South Coast from local residents.

Our state needs to realise that what ever power system we choose, it will have affects.

Using high quality coking coal and gas systems that we already have, as we transfer onto cleaner nuclear power, will have less impact on our environment and it will cost a lot less, and be more reliable, in my opinion.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 16 November 2023 12:38:27 PM

Submitted on Thu, 16/11/2023 - 12:38

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Natalie Howe

Last name Howe

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2315

**Please provide your view on the project** I object to it

## Submission

This is lunacy to rely on weather in the face of climate change, we require more robust and efficient energy production. In addition, it's farcical to destroy the environment to save the environment - these energy sources are inefficient and intermittent, with much larger physical footprints than existing/conventional fossil fuel or nuclear power generation. These plans are destructive to regional communities that relay on tourism, like Port Stephens, without any compensation nor benefits being delivered.

I agree to the above statement

Yes

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 16 November 2023 2:04:26 PM

Submitted on Thu, 16/11/2023 - 14:03

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Andrew

Last name Armitage

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2282

**Please provide your view on the project** I object to it

**Submission** This monstrosity of an "energy system" is not on. Nuclear, coal or gas is the solution!!!

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 16 November 2023 3:50:39 PM

Submitted on Thu, 16/11/2023 - 15:50

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

## Name

First name Barry

Last name Dicker

I would like my name and personal contact details to remain confidential No

## Info

Email

Suburb/Town & Postcode 2319

**Please provide your view on the project** I object to it

## Submission

We need base load power, build modern coal fired or nuclear power stations, don't destroy our coastal towns with these costly monstrosities that will cost millions to maintain

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 16 November 2023 6:33:53 PM

Submitted on Thu, 16/11/2023 - 18:33

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

## Name

First name Ben

**Last name** Walsh

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Muswellbrook

**Please provide your view on the project** I object to it

## Submission

Wind turbines should be placed off Bondi and Manly, and some placed in the parks throughout Sydney, as well as solar farms in the middle of the city.

Why do city residents, and government, feel that rural NSW is required to shoulder the burden of these absolute eyesores.

Again, propose to put them in the middle of Sydney and see how much support you get.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 16 November 2023 8:54:05 PM

Submitted on Thu, 16/11/2023 - 20:53

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Troy

Last name Margery

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2321

**Please provide your view on the project** I object to it

## Submission

Wind turbines kill birds. Off shore wind is expensive. Wind turbines create intermittent power which puts stress on the grid. Wind turbines use power to spin the blades when there is no wind blowing as they can't start from a stand still. When the wind is too strong wind turbines have to turn off to protect them selves. Wind turbines are ugly and are a waste of money.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 17 November 2023 9:10:39 AM

Submitted on Fri, 17/11/2023 - 09:10

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

## Name

**First name** Martyn

Last name Walker

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2320

**Please provide your view on the project** I support it

## Submission

Living here, in the Hunter and knowing that such advanced and far reaching renewable energy initiatives are being planned for our region makes us proud.

We have so much potential here for such programs.

The off shore wind farm zone is a brilliant initiative and we fully support it.

Increased Solar and battery installations along with hydrogen manufacturing using renewable energy are exactly what the Hunter region needs.

The potential for increased employment opportunities which flow on from taking up these renewable opportunities are endless.

In addition, the opportunity to reduce CO2 in the atmosphere, through increased use of renewables in paramount for our future.

The sooner these renewable initiatives and opportunities are realized the better for us all.

Thank you.

Kind regards Martyn Walker

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 17 November 2023 1:41:25 PM

Submitted on Fri, 17/11/2023 - 13:41

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Malcolm

Last name Ritter

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Greenlands , 2330

**Please provide your view on the project** I am just providing comments

## Submission

Standardized guidelines are certainly needed , but I have serious concerns with some aspects of the DRAFT :

(1) : Consultation with the local community FROM THE BEGINNING should be ENFORCED, especially in respect of what should be the very first step regarding the baseline character of the area.

(2): "Wind power stations" which are INDUSTRIAL facilities, are allowed in "rural" / "industrial" / "special purpose areas", but NOT in urban areas, WHICH IS
SUGGESTING THAT IT IS PARAMOUNT THAT THE AMENITY OF URBAN
DWELLERS IS CONSIDERED ABOVE THAT OF RURAL DWELLERS, ie, Albury / Dubbo / Goulbourn / Griffith etc etc, as examples, are off-limits according to the draft.
(3): How will the draft guidelines be enforced ?,, because past history has shown
Developers to by-pass much of what is mentioned in the draft, despite already knowing "right from wrong".

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 17 November 2023 4:03:09 PM

Submitted on Fri, 17/11/2023 - 16:02

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Beau

Last name Burke

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2575

**Please provide your view on the project** I support it

## Submission

I want to see the quick phase out of fossil fuels. This policy aims to increase the capacity of renewable energy and I support that all the way. Build wind and solar as fast as possible.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 18 November 2023 7:41:38 AM

Submitted on Sat, 18/11/2023 - 07:41

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Matthew

Last name Wesley

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Coolah 2843

**Please provide your view on the project** I support it

**Submission** I support this project

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 18 November 2023 1:52:11 PM

Submitted on Sat, 18/11/2023 - 13:51

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Rodney

Last name Dever

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2291

**Please provide your view on the project** I support it

## Submission

I totally support our shift towards renewable energy and believe it will result in the cheapest and most reliable system Australia has had.

But I also believe that Energy providers need to push back against misinformation by certain media organizations and stop taking the neutral ground.

I agree to the above statement

Yes

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 18 November 2023 5:34:53 PM

Submitted on Sat, 18/11/2023 - 17:34

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Phil

Last name Heaton

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Budgewoi 2262

**Please provide your view on the project** I am just providing comments

## Submission

Support proper solar feed in tarrifs for those who are contributing by generating excess electricity. Contain the price gouging of electrical wholesalers on daily services charges. Consider community battery support on all futures new developments.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 19 November 2023 6:15:24 AM

Submitted on Sun, 19/11/2023 - 06:15

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Richard

Last name Sharp

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2620

**Please provide your view on the project** I am just providing comments

## Submission

I support the proposed guidelines, especially that related to wind energy. I do note however that the Draft Wind Energy Guideline needs expanding to ensure they mention the following:

-When selecting a site and developing the layout and design of a project, it is important to consider toppling distance and the area of land and its features that could be adversely impacted, should the turbine collapse or fall over.

-When undertaking the assessment, that the considered risks to biosecurity, take account of the importation into Australia of turbine components including replacement parts, especially given the location of the wind energy facility in rural areas and the threat posed by plant pest species such as the Brown Marmorated Stink Bug and the Khapra Beetle.

-The assessment gives careful consideration to emergency management planning requirements, especially environmental related emergencies that may stem from the construction, operations or decommissioning of the wind energy development.

Thank you for the opportunity to contribute.

I agree to the above statement

Yes

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 19 November 2023 10:55:49 AM

Submitted on Sun, 19/11/2023 - 10:55

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name James

Last name Lewis

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Tugrabakh nsw 2422

Please provide your view on the project

I am just providing comments

## Submission

NSW now have thousands of home with roof solar panels. However, the Electricity companies give the bear minimum rebate on solar power 5 to 7 cents per KW and sell it back to the consumer at between 32 cents and 51 cents per KW.

A rebate on solar power batteries to all solar panel owners would:

A) take the load off the electrical power grid immediately.

B) provide power to those with solar during peak times, as it can be used from the batteries

C) provide power to those with solar, during black outs.

D) provide power to those with solar, to have their power costs reduced significantly,

because they are only using the power they produce.

E) allow for community batteries to be installed for small communities, and recharge stations for vehicles.

The Government needs to stop the rip offs by the power companies and batteries are going to save the government millions of dollars, through infrastructure.

## I agree to the above statement

Yes

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 19 November 2023 1:04:38 PM

Submitted on Sun, 19/11/2023 - 13:04

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Martin

Last name Lander

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2527

**Please provide your view on the project** I support it

## Submission

Most of the proper research I've read lately shows no adverse affects on whale migration or fish stocks.

I have even seen a study that demonstrates that the anchor points for floating turbines create artificial reefs providing sanctuary for fish breeding and fish stocks actually improved. A bit counter intuitive I know.

Also won't adversely affect surf wave propagation for surfers.

My main concern is that proper protocols are put in place for recycling worn components, on-going maintenance and emergency preparedness in the event of turbine fire or failure of anchor points. All things that with proper planning and resourcing can be dealt with.

The opportunity for providing suitable power for green hydrogen production at Port

Kembla, jobs in construction and maintenance, research etc are real opportunities for the area.

Personally I like the look of them because it means that considerate individuals are taking the global warming warning seriously. As for those "privileged" folk who are concerned about their "view", their view won't be much if rising sea surges drop their beach/cliff residences into the ocean. Anyone else who lives a street back from the edge won't have them in permanent view anyway.

I think that to force a destructive climate on the majority of the country to satisfy the personal proclivities of an extremely vocal and tiny minority of the population with the financial resources to garner emotional support from a slightly larger minority is morally unconscionable.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 19 November 2023 3:02:18 PM

Submitted on Sun, 19/11/2023 - 15:02

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Jason

Last name murray

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2259 wyee

**Please provide your view on the project** I object to it

## Submission

Get real with energy and not pipeline dreams.

The public is well aware of the nonsense regarding wind turbines, they need base load coal to work and will never produce the energy as the carbon footprint it took to build and fabricate, also they need to be disposed of by burying as they don't breakdown over time.

Absolutely a waste of the people's money.

Clean and affordable power alternatives are in use in other countries, HELE coal power and carbon capture to existing plants.

The government both labour and liberal have dropped the ball on this. Should of been on the table 20 years ago.

We pay far too much for electricity in this country and it's no one's fault but the government of the day. Selling our electricity generators to private companies. Absolutely a disgrace.

The proposed will cost us more in the long run, but that's all part of the plan.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 19 November 2023 10:36:27 PM

Submitted on Sun, 19/11/2023 - 22:36

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Carol

**Last name** Flanagan

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2358

**Please provide your view on the project** I object to it

## Submission

I am absolutely against any Wind or Solar in our area we are Farmers growing livestock to feed people!! Not to mention the desolation of our beautiful pristine New England district with our numerous waterfalls and native flora and fauna

We as a Family stand together on this very concerning matter, we also do not want any Transmission lines going thru or near our property !!

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 20 November 2023 12:22:07 PM

Submitted on Mon, 20/11/2023 - 12:21

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Adam

Last name Alenezi

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2500

**Please provide your view on the project** I object to it

Submission the WEF

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 20 November 2023 12:44:40 PM

Submitted on Mon, 20/11/2023 - 12:43

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Kay

Last name Wilson

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode SAUMAREZ PONDS 2350

**Please provide your view on the project** I object to it

## Submission

I object to wind factories, large areas of solar panels on prime agricultural land in the New England and Northern Tablelands regions.

The cost of construction, the unsustainability of this type of generation (only 20 years before decommissioning) and the accompanying new transmission lines which would need to be built is ALL NONSENSICAL.

NUCLEAR GENERATION IS THE ONLY FEASIBLE OPTION FOR NEW SOUTH WALES AND VICTORIA

Please turn your attention to what is happening in our State regional areas.

More and more guidelines which come out in response to the clearly stated objection to the rollout of thousands of wind turbines, on ground solar panels and kilometres of new transmission lines in our State regional areas are a waste of time.

You cannot convince us to change our minds by revising guidelines.

Nuclear power generation on a slowly increasing global scale is our only option.

Therefore, your efforts need to continue to be blocked and eventually sense will prevail.

Sincerely, Kay Wilson Armidale 2350

Sent from Mail for Windows

This is a 64 page document.

Only one page, p. 24 is worth my attention. Table 6. Photos of :

Low Medium High Visual presence

Let's focus on "Human presence" at the bottom of your Table 6.

If the transmission lines are added to this scene, it would hardly be noticed.

Why spend months of your working life trying to convince the population of regional areas in NSW to accept new transmission lines?

Nuclear generation is the only sensible alternative. It needs no more transmission lines to be constructed across regional NSW.

No more transmission guidelines will need to be revised and revised and then rejected.

Regards, Kay Wilson Armidale 2350

Sent from Mail for Windows

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 20 November 2023 4:57:19 PM

Submitted on Mon, 20/11/2023 - 16:57

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Alan

Last name Wilkins

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2226

**Please provide your view on the project** I object to it

#### Submission

I do not believe the overall cost of building this infrastructure is viable, I fear future disposal, as there is no possibility of recycling of either wind turbines or solar panels. There is no back up system planned for night time power when there is little wind. I support improving (lowering) emissions of coal fired power stations as well as nuclear power. I do not have any confidence the existing government has any idea of what they are doing. Although it does not affect me directly the proposed wind farms are a visual disgrace.

I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 20 November 2023 5:03:20 PM

Submitted on Mon, 20/11/2023 - 17:03

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Thomas

Last name Armitage

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2500

**Please provide your view on the project** I object to it

#### Submission

I believe that the Draft Energy Policy framework is incomplete. I cannot see anything regarding a nuclear power station being built in the Hunter Valley near existing transmission lines. This is a gross oversight.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 20 November 2023 8:00:26 PM

Submitted on Mon, 20/11/2023 - 20:00

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Mandy

Last name Rennie

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2852

**Please provide your view on the project** I object to it

#### Submission

The proposed solar infrastructure is a criminal use of land and resources. The impacts on the environment and communities needs to be evaluated. 5000 workers are expected in the Mid-West. That's a small town. Where will food come from? Water? What do we do with waste? How does an already crippled medical network cope? Strains on schools who don't have enough teachers as it is.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 20 November 2023 11:35:57 PM

Submitted on Mon, 20/11/2023 - 23:35

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Mitch

Last name Nebauer

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Charlestown 2290

**Please provide your view on the project** I am just providing comments

**Submission** Need for coal power stations, renewables alone cant produce enough power

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Tuesday, 21 November 2023 9:26:41 AM

Submitted on Tue, 21/11/2023 - 09:26

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name debbie

Last name fitzgerald

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** binnaway 2395

**Please provide your view on the project** I object to it

#### Submission

I object to these turbines in our area .they are a fire risk.affect birdlife..look horrible and out of place..are not recyceable so in years to come when they are outdated we are stuck with the relics..they use oil and motors so can be prone to catching fire and they are a expense that none of us taxpayers want to be stuck with...

I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 22 November 2023 5:21:26 AM

Submitted on Wed, 22/11/2023 - 05:21

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** David

**Last name** Phelan

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Merewether 2291

**Please provide your view on the project** I object to it

**Submission** Too many resources required for too little result. An environmental disaster in the making

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 22 November 2023 6:36:28 AM

Submitted on Wed, 22/11/2023 - 06:36

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Chris

Last name Troncone

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Port Kembla

**Please provide your view on the project** I object to it

**Submission** Why don't we go to nuclear energy which is cleaner and cheaper?

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 22 November 2023 8:37:06 AM

Submitted on Wed, 22/11/2023 - 08:36

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Allan

Last name Kruger-Davis

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2304

**Please provide your view on the project** I support it

#### Submission

My position is that urgency and policy certainty in this area is more important than getting it perfect. We urgently need to decarbonise and transmission in particular is a limiting factor. Just get it built. The renewables will follow if the congestion and approvals process (both connection AEMO and dept. planning) is more certain.

If we want to have any chance of keeping to our climate obligations, saving wilderness areas and transitioning our economy then this needs to happen with the upmost urgency.

#### I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 22 November 2023 12:30:29 PM

Submitted on Wed, 22/11/2023 - 12:30

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Alan

Last name Wilkins

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2226

**Please provide your view on the project** I object to it

#### Submission

I do not believe humans are the main cause of climate change, geologists can prove carbon dioxide levels have been much higher many years ago. Wind and solar farms are expensive to build and maintain. They are an eyesore and cannot be recycled. The main benefit is to the manufacturers of this technology mostly in China. They are using mostly coal fired power to manufacture and reap the benefits. We are being duped by climate alarmists.

I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 23 November 2023 6:18:59 AM

Submitted on Thu, 23/11/2023 - 06:18

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

#### Name

**First name** Jennifer

Last name Manning

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Wollongong 2500

**Please provide your view on the project** I object to it

#### Submission

Offshore and onshore windfarms will not be viable for the future and will cost the next generations huge tax and money. These windfarms will destroy our wildlife and marine life that we have been working to protect for decades. Other counties are now abandoning these projects as they are not working out and in USA legal action is being taken for the death of whales due to these windfarms. This will be our future if allowed to go ahead. We all want green energy and to reduce climate change and so many alternatives are becoming available but not windfarms. Do not destroy the earth to save the earth!

#### I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 23 November 2023 7:11:17 AM

Submitted on Thu, 23/11/2023 - 07:11

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Christine

Last name Macfadyen

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2262

**Please provide your view on the project** I object to it

#### Submission

Nuclear energy MUST be included in the fix. You are damaging the environment both on and offshore for a climate ideology. Chris Bowen is a hated member of the Australian people as he blows up, tears out & demolishes property, trees, animals, marine life & just leaves an ugly line of monoliths on our ridges and seas. He must be stopped. He is psychotic in his endeavours to leave his mark in politics! Please, someone with sense, stop this maniac and protect our land & beaches. Developers overseas are withdrawing their support of wind turbines, the damage to health & well being is now well documented. The cost to install & maintain these monsters is growing exponentially and our k9ala habitat, already much reduced, is almost extinct. Please, someone stop this maniac! Nuclear is the only viable & safe option which must be considered. We have such intelligence in this country, we cannot allow climate ideology ruin our beautiful, pristine country. Please, someone, stand up to this madness!

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 23 November 2023 1:17:33 PM

Submitted on Thu, 23/11/2023 - 13:17

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

#### Name

First name Owen

Last name Byrnes

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2290

**Please provide your view on the project** I support it

#### Submission

Hi NSW Gov,

Just wanted to say, as a young person, I am very pleased that our government is doing something about renewable energy with a proper grasp on science and peer reviewed work. I know you would be receiving many negative comments from the older generation, but they are not the ones to face these issues far into the future. Unfortunately many are mislead and angry about the rapid change that society is going through. Please keep fighting for and funding these projects, for the sake of our energy security and for the generations ahead.

Thank you, Owen - Radiographer and climate change advocate

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 23 November 2023 4:02:10 PM

Submitted on Thu, 23/11/2023 - 16:01

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Wally

Last name Cover

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2403

**Please provide your view on the project** I object to it

#### Submission

It far to expensive and inefficient and run by overseas companies all for no reason we have millions of tons of coal and gas and it is being sent overseas to make other countries rich at the expense of the Australian people and wind and solar are subsidised, if it is no cost effective it should be scrapped

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 23 November 2023 9:02:53 PM

Submitted on Thu, 23/11/2023 - 21:02

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Clint

Last name Turner

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Springfield 2250

**Please provide your view on the project** I support it

#### Submission

I am fully support of all efforts to increase renewable energy production. As a Central Coast resident I am happy to see our coal fire power stations replaced with offshore wind farms!

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 24 November 2023 8:15:16 AM

Submitted on Fri, 24/11/2023 - 08:15

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Tim

Last name Bateson

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Stockton

**Please provide your view on the project** I support it

#### Submission

We need renewable sources of energy now and if the only argument the coal lobby can contrive of to object to the plan is based on a no -existent study, then we should just proceed to construction.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 24 November 2023 9:01:46 AM

Submitted on Fri, 24/11/2023 - 09:01

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

#### Name

**First name** Carolyn

Last name Chamberlain

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Dubbo 2830

**Please provide your view on the project** I object to it

**Submission** I would like to see the option of Nuclear energy investigated

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 24 November 2023 10:05:50 PM
Attachments:	gong-sunrise-pdf.pdf

Submitted on Fri, 24/11/2023 - 22:04

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

#### Name

First name Alexander

Last name Petersen

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Kiama

**Please provide your view on the project** I object to it

Submission file gong-sunrise-pdf.pdf (66.09 KB)

**Submission** Keep your filthy wind turbines off our coast!

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 24 November 2023 10:38:57 PM

Submitted on Fri, 24/11/2023 - 22:38

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

#### Name

First name Kirsten

**Last name** Mawby

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Unanderra 2526

**Please provide your view on the project** I am just providing comments

#### Submission

Overall it is good to see some progress on standardising such guidelines for NSW however:

1) It is worrying to see in the wind energy guide that the EIS appears to focus on just noise impact rather than full environmental impact as per EPBC Act. It is important to align all Planning and Assessment guidelines with Environmental (as in protecting Australia's flora and fauna) guidelines including the EPBC Act with the EPBC Act taking priority over damaging our environment further.

2) It is equally concerning that National Parks are mentioned as while a single small turbine to run an information centre would have minimal impact, a large scale wind farm and/or transmission cabling in a national park would have detrimental and unacceptable effects on insects, bats and birds which are important to the ongoing success of

sustainability and environment.. EIS for any project should first and foremost be focused on the impact to the flora and fauna of the area and this should be made clear in the planning guidelines. It should also discourage building in national parks.

3) In the UK's Solway Firth they successfully ran transmission cables underground, reducing the impact on trees and visual impacts. Given that most transmission cables now require 3m clearance from trees/vegetation under, above and around cables either new transmission lines should be forced to avoid existing tree plantations/ forests/ bushland or the cables should be made to be buried deep underground, deeper than wombats, echidnas and other burrowing mammals will normally dig or be affected by.

Better yet, why not run them as waterproof cabling through existing sewerage and waste water channels which means they will have protective concrete casing around them, will not affect the trees above ground and will not have visual impact? If deep enough they would also be less likely to sustain bushfire damage.

4) Is there any way that the solar and renewable energy guidelines can mandate that new buildings must build solar and/or other green energy mechanisms within the buildings footprint that power not only the building but the ones around it as well. This should be law for all buildings including houses, but is particularly important in regards to buildings that use up large areas of land (e.g. shopping centres, steel works, car parks, retail buildings and warehouses such as Costco, Bunnings, Total Tools etc). These large buildings and car parks should have to either plant back the land taken out below them on top of them (e.g. green rooves similar to Rheghead in Cumbria) or should have to install the maximum green energy production equipment on their roof space to reduce the impact they have made when clearing bushland and replacing it with concrete.

5) Unless there are extreme benefits to bigger turbines the planning and assessment guildines should set limits to the maximum turbine height, size and density.

6) The guidelines mention visual impact but an important safety aspect they do not address: Wind turbines should never be able to be placed on either side of a road, especially where land ownership is different on each side of the road. The reason for this is purely for safety- with wind turbines on one side of the road they can turn to no terrible effect. But if on both sides of a road, turning at different times (usually because they are owned by different people) the effect is like that of vertigo to a driver on the road. I have experienced it and seen it myself in a place called Flimby in Cumbria UK and it is enough to make vehicles wobble over the road or pull over.

7) The guidelines should acknowledge and reference other emerging technologies that can assist with meeting the government's 2030 targets.

For example there is plate technology I Japan where people walking on plates in the footpath can generate electricity. If this was applied to somewhere like Sydney the positive impact would be great, and if it is developed to sitbunder roads can you imagine the possibilities.

There is also heating technology as a by-product of biomass boilers that can produce hot water for whole towns.withoit the need of electricity to heat it.

8) Communities affected by turbines or other infrastructure products should be able to determine where the projects are best built. This could be done by providing them with a number of options and let them vote.

9) Transmission cables over motorways would potentially deter animals from the busy roads thereby helping to save wildlife.

Regards, Kirsten

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 25 November 2023 2:53:35 PM

Submitted on Sat, 25/11/2023 - 14:53

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am submitting on behalf of my organisation

#### Name

**First name** Philip

Last name Pollard

I would like my name and personal contact details to remain confidential No

#### Info

Email

**Suburb/Town & Postcode** 2290

**Please provide your view on the project** I support it

#### Submission

We need to move very rapidly to renewable generation of electricity. A great deal of disinformation is being disseminated in respect to renewables - particularly wind generation - especially offshore.

In many instances individuals who are fully aware of the gross inaccuracy of the claims continue to spread misleading 'information'.

There is no evidence of marine wind turbines harming whales. Damage to marine ecosystems from turbines is minuscule compared with seismic blasting - the first damaging step in under-sea exploration for gas & oil..

Extraction exacerbates the damage markedly - not to mention leaking methane & emissions when gas/ petroleum products are burned. We have more than enough approved

gas extraction sites for transition, and do not need new fossil fuel extraction.

We must upgrade the grid urgently. This is imperative. Highly scenic locations should be avoided as transmission line routes, but these are limited in area and can, and are now being, identified.

Let's get a move on with renewables & storage capacity. This should not be derailed by attention seekers & wreckers.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 25 November 2023 3:56:41 PM

Submitted on Sat, 25/11/2023 - 15:56

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Diana

**Last name** Karamacoska

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2500

**Please provide your view on the project** I object to it

#### Submission

Overall it is good to see some progress on standardising such guidelines for NSW however:

1) It is worrying to see in the wind energy guide that the EIS appears to focus on just noise impact rather than full environmental impact as per EPBC Act. It is important to align all Planning and Assessment guidelines with Environmental (as in protecting Australia's flora and fauna) guidelines including the EPBC Act with the EPBC Act taking priority over damaging our environment further.

2) It is equally concerning that National Parks are mentioned as while a single small turbine to run an information centre would have minimal impact, a large scale wind farm and/or transmission cabling in a national park would have detrimental and unacceptable effects on insects, bats and birds which are important to the ongoing success of

sustainability and environment. EIS for any project should first and foremost be focused on the impact to the flora and fauna of the area and this should be made clear in the planning guidelines. It should also discourage building in national parks.

3) In the UK's Solway Firth they successfully ran transmission cables underground, reducing the impact on trees and visual impacts. Given that most transmission cables now require 3m clearance from trees/vegetation under, above and around cables either new transmission lines should be forced to avoid existing tree plantations/ forests/ bushland or the cables should be made to be buried deep underground, deeper than wombats, echidnas and other burrowing mammals will normally dig or be affected by.

Better yet, why not run them as waterproof cabling through existing sewerage and waste water channels which means they will have protective concrete casing around them, will not affect the trees above ground and will not have visual impact? If deep enough they would also be less likely to sustain bushfire damage.

4) Is there any way that the solar and renewable energy guidelines can mandate that new buildings must build solar and/or other green energy mechanisms within the buildings footprint that power not only the building but the ones around it as well. This should be law for all buildings including houses, but is particularly important in regards to buildings that use up large areas of land (e.g. shopping centres, steel works, car parks, retail buildings and warehouses such as Costco, Bunnings, Total Tools etc). These large buildings and car parks should have to either plant back the land taken out below them on top of them (e.g. green rooves similar to Rheghead in Cumbria) or should have to install the maximum green energy production equipment on their roof space to reduce the impact they have made when clearing bushland and replacing it with concrete.

5) Unless there are extreme benefits to bigger turbines the planning and assessment guildines should set limits to the maximum turbine height, size and density.

6) The guidelines mention visual impact but an important safety aspect they do not address: Wind turbines should never be able to be placed on either side of a road, especially where land ownership is different on each side of the road. The reason for this is purely for safety- with wind turbines on one side of the road they can turn to no terrible effect. But if on both sides of a road, turning at different times (usually because they are owned by different people) the effect is like that of vertigo to a driver on the road.

7) The guidelines should acknowledge and reference other emerging technologies that can assist with meeting the government's 2030 targets.

For example there is plate technology in Japan where people walking on plates in the footpath can generate electricity. If this was applied to somewhere like Sydney the positive impact would be great.

There is also heating technology as a by-product of biomass boilers that can produce hot water for whole towns without the need of electricity to heat it.

8) Communities affected by turbines or other infrastructure products should be able to determine where the projects are best built. This could be done by providing them with a number of options and letting them vote.

9) Transmission cables over motorways would potentially deter animals from the busy roads thereby helping to save wildlife

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 25 November 2023 7:37:53 PM

Submitted on Sat, 25/11/2023 - 19:37

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Jeremy

Last name Dawes

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2287

**Please provide your view on the project** I support it

**Submission** I'm in favour of all types of renewable energy whether they are on land or sea.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 26 November 2023 12:52:25 PM

Submitted on Sun, 26/11/2023 - 12:52

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Joe

**Last name** Golab

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2529

**Please provide your view on the project** I support it

#### Submission

We have been long time solar users and recent battery users and so no other practical way of exiting coal fired power.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 27 November 2023 10:10:19 AM

Submitted on Mon, 27/11/2023 - 10:10

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Allan

Last name Beaton

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Lake Munmorah

**Please provide your view on the project** I object to it

#### Submission

You are throwing money away. NUCLEAR is the only sensible way forward. There are so many better ways than to waste so much on feeding greenies. Get some real science & engineering & wake up Australia.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 27 November 2023 7:48:20 PM

Submitted on Mon, 27/11/2023 - 19:48

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Trinity

Last name Hooper

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2350

**Please provide your view on the project** I object to it

#### Submission

I fully object to these projects. I fully object to projects in the New England. Destroying CRITICAL koala habitat as well as so many other species including threatened and endangered species.

"Offsets" are not good enough. No where near good enough. "Community Consultation" has thus far been completely rigged and our communities voices are not being heard by you. Do better.. So so so much better.

I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 27 November 2023 10:35:29 PM

Submitted on Mon, 27/11/2023 - 22:35

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Rebecca

Last name Harrison

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Walcha 2354

**Please provide your view on the project** I object to it

**Submission** I do not support this project at all.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Tuesday, 28 November 2023 1:28:05 PM

Submitted on Tue, 28/11/2023 - 13:27

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

#### Name

**First name** Kathryn

**Last name** Morris

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Nowendoc 2354

**Please provide your view on the project** I object to it

#### Submission

I consider WALCHA and surrounds TOTALLY unsuitable for ALL the proposed wind farms as the town and outlying area has no infrastructure and the disposal of turbines and supporting structures at the end of their life is not viable

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Tuesday, 28 November 2023 8:54:37 PM

Submitted on Tue, 28/11/2023 - 20:54

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** John

**Last name** Thomas

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2283

**Submission** Use of tidal energy?

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Tuesday, 28 November 2023 9:37:16 PM

Submitted on Tue, 28/11/2023 - 21:36

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Allan

Last name Morris

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Nowendoc 2354

Please provide your view on the project

I am just providing comments

#### Submission

I am indicating that I am concerned and objecting to the Winterbourn Wind project. Some Reasons. Serious doubts concerning with the decommissioning process.

Map changes by developer and invester pressure.

Total costs to the community and community infrastructure grossly understated. What is 'social licence'?

Then we have guidelines pointed at forced acquisition.

No information on vehicle movements after delivery of material to the construction site.

Thunder Bolts Way south from Walcha to Newcastle port is the obvious shorter return trip. This road will not take this volume of traffic.

I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 29 November 2023 10:46:13 AM

Submitted on Wed, 29/11/2023 - 10:46

Submitted by: Anonymous

Submitted values are:

Submission Type I am making a personal submission

### Name

First name Tim

Last name Rogers

I would like my name and personal contact details to remain confidential No

### Info

Email

Suburb/Town & Postcode Ebor

**Please provide your view on the project** I object to it

### Submission

I object to large scale renewable energy projects for the following reasons.

1. Community surveys suggest overwhelmingly, there is no social licence for the projects. Community division is devastating, especially in relation to the disproportionate winners, few, ( the hosts ) and large cohort of losers, ( the community, neighbours ).

2. Destruction of the environment to construct the projects, and continued destruction to wildlife after construction.

Changes to wind patterns, thermal uplifts, radiative solar, heat, all affecting weather patterns.

3. Massive use of resources in construction and placement of renewable projects. for example., gravel for roads, water, concrete, steel.

4. Huge subsidies without which these projects are economically unviable.

5. Congestion of roads during construction.

6. Overwhelming pressure on available accommodation forcing locals out.

7. Changing land use from prime food producing agricultural land into an industrial waste land.

8. Nothing renewable in these projects apart from the wind and sun which has to be captured by non renewable infrastructure that has to be replaced every 15 to 20 years.

9. Forced land acquisition for unwanted powerlines.

10. Devaluing of property values with proximity to renewable projects.

11. Impossible to run the economy on unreliable, intermittent and unmanageable electricity.

12. The imbedded cost, energy, used in the manufacture of turbines and panels not repaid in the life of the projects.

13. Growing evidence in other countries that these renewables are not fit for purpose. Yours faithfully

Tim Rogers

I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 29 November 2023 2:15:17 PM

Submitted on Wed, 29/11/2023 - 14:13

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

**First name** Larraine

Last name Nicholson

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2322

**Please provide your view on the project** I object to it

#### Submission

I am not in favour of wind turbines at all. Would like our nation to go nuclear. We have plenty of uranium in this country. Larraine Nicholson.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 29 November 2023 4:03:46 PM

Submitted on Wed, 29/11/2023 - 16:03

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Gregory

Last name Olsen

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2578

**Please provide your view on the project** I support it

### Submission

I support every endeavour by the NSW Government to urgently transition from fossil fuel energy generation to renewables. Thanx.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 30 November 2023 7:18:34 AM

Submitted on Thu, 30/11/2023 - 07:18

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Tim

Last name Bard

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2250

**Please provide your view on the project** I object to it

#### Submission

Stop this nonsensical program. As an MS in Environmental Science with 40 years of experience in energy and engineering I fully understand the power supply issue. This whole program is based on a falsity focused on one minor facet of the environment-CO2.. Even IF CO2 was the most important factor in "global warming" Australia s contribution to the world CO2 volume is so trivial as to be de minimous, China,India and Africa have no option than to increase The energy supply to their red expanding populations. That can only be done via "fossil fuel " energy development = increasing CO2... Not only is this renewables project implausible and impracticable it is impossible to meet24/7/365 energy needs for Australia in an environmentally responsible way.

### I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 30 November 2023 7:21:22 AM

Submitted on Thu, 30/11/2023 - 07:21

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Jean

Last name Huggins

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Tamworth

**Please provide your view on the project** I object to it

#### Submission

I am objecting to the Solar farms in the Tamworth area. Namely solar farms being proposed for prime farming land. Taking away such an important resource from the Australian landscape is ludicrous!!!! And vandalising the land with what you think is going to save the world is a load of codswollop.

Coal is still at this time our best option and in the future possibly nuclear. They are the only energy sources capable of sustaining our power energy needs.

If you continue to litter our country with so called renewable we are going to be left with a massive pile of unreachable debris across the land. You people in power won't be around in 20 yrs but someone will have to clean that mess up!!!!

Solar panels should be on every home and business's roves. Let's make that law. Every

mew building must be self sustainable. Spend all that money on subsidies for the people.

It is unfair that people in the New England have to look at these ugly eye sores for the next 20 - 30 years so people in the cities can feel good about what they think is green power. Let them come up here and stare at them all day.

There are many other places these Solar farms could go. Airports, railways, every carpark roof areas in shopping centres, sports stadium roves, etc etc not bloody farm lands!!!!

If people want green power in the cities let them cope with the renewable in the city. Don't blight our landscape with them!!!

Get them out where no one can see them, not anywhere near people's properties that they have worked all their lives to achieve only to have a solar put at their front door.

Trees, grass, food, cattle, sheep, children, fresh air, crops. That's why we live in The New England. WE GROW YOUR FOOD!!!

Help us save this land, do not destroy it with 1,000,000 solar panels. THINK ABOUT THAT a million solar panels is your morning view????

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 30 November 2023 7:23:50 AM

Submitted on Thu, 30/11/2023 - 07:23

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Russell

**Last name** Williams

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2267

**Please provide your view on the project** I object to it

**Submission** Prioritise nuclear energy

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 30 November 2023 8:47:55 AM

Submitted on Thu, 30/11/2023 - 08:47

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name Rowen

Last name Matthews

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2350

### Submission

There is no box to tick for asking a question yet stakeholder questions should be a most important part of your process. So I am not confident that my question will be answered. My question is about the sudden irrevocable often inappropriate re-zoning of rural land to industrial zones. Why are solar factories (ie Petersons solar factory on the edge of Armidale) being installed in valleys, disturbing the amenity of all who overlook the valley, without any consultation?

I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 30 November 2023 9:41:32 AM

Submitted on Thu, 30/11/2023 - 09:41

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** James

Last name Martin

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Rylstone

**Please provide your view on the project** I am just providing comments

### Submission

Give us reliable and affordable base Coal, Gas and Nuclear Power Stations.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 1 December 2023 4:53:45 PM

Submitted on Fri, 01/12/2023 - 16:53

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Jon

Last name Fox

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Batehaven NSW 2536

**Please provide your view on the project** I object to it

#### Submission

I'm dead against offshore wind farms! Hands off the Port Stephens and Illawarra offshore zones. If the ALP/Greens/Teals really wants them, put them off the northern beaches of Sydney and off Bondi - maybe some in Sydney Harbour off the Teal held seats. If the ALP/Greens/Teals really want more and mor solar farms, plow up the parks and recreational areas in ALP/Greens/Teals seats and leave us in regional areas out of it all.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 2 December 2023 11:46:28 AM

Submitted on Sat, 02/12/2023 - 11:46

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Join

Last name O'Connor

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2300

**Please provide your view on the project** I object to it

### Submission

Climate change is natural. The idiotic scheme to net zero is already causing power prices to go through the roof.. the only beneficiaries of wind and solar are the scammers behind the climate change scam. Meanwhile you destroy thousands of hectares of native forests and farm land. Every country who fell for the scam are paying huge power prices. Many are turning away from unreliable renewables and looking to their carbon plants or nuclear. Remove the renewables taxpayer provided subsidies, see how many companies put their hand up to install.

You people need to grow up, face reality.

#### I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 2 December 2023 4:36:00 PM

Submitted on Sat, 02/12/2023 - 16:35

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Alex

**Last name** Grimas

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2321

**Please provide your view on the project** I am just providing comments

### Submission

Replace the coal fired power stations with nuclear. Stop wasting money and destroying the environment

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 3 December 2023 2:02:48 PM

Submitted on Sun, 03/12/2023 - 14:02

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Bob

Last name King

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Waverton

**Please provide your view on the project** I am just providing comments

#### Submission

This acceleration will be redundant when it is realised how futile is the need - see attached chart.

Why don't you allow jpeg files to be uploaded - it must be one of the most common file types, and I don't know how to convert to your allowed files.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Tuesday, 5 December 2023 6:14:15 PM

Submitted on Tue, 05/12/2023 - 18:14

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Klaus

Last name Keck

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Bogee 2849

**Please provide your view on the project** I object to it

#### Submission

Just don't do it! Wind farms produce about one third of their so called rated output due to wind variability. Further, most of these projects should only be funded by the company doing them, WITHOUT any government support either direct or indirect. If these projects are truly viable, they will be self supporting and self funding. They should NOT BE SUBSIDISED in any way.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 6 December 2023 5:15:48 AM

Submitted on Wed, 06/12/2023 - 05:15

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Jason

Last name Farrell

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2282

**Please provide your view on the project** I object to it

### Submission

Invest in nuclear energy. Solar panels and wind turbines are not sustainable and will not be manufactured in Australia.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 6 December 2023 10:15:33 PM

Submitted on Wed, 06/12/2023 - 22:15

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Janelle

Last name Moeck

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2318

**Please provide your view on the project** I object to it

#### Submission

We need to keep coal longer while looking at maintainable ways to produce extra power. Better solar technology. More incentives for landlords to install. Some government projects cost far more to implement than what they produce back. Don't wreck the coastline.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 6 December 2023 10:16:50 PM

Submitted on Wed, 06/12/2023 - 22:16

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Charles

Last name Koebel

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Walcha ..N.S.W

**Please provide your view on the project** I object to it

#### Submission

I strongly object to the whole proposed renewable energy program as Nuclear energy is not in the equation. This whole program is the most selfish waste of resources and will destroy the environment I live in. What is really sad is there are much better alternatives that our narrow minded politicians refuse to look at . Meanwhile a large proportion of the rest of the World is taking nuclear energy on board.

On the aviation side of the draft policy there is what I would call a dangerous loophole re lighting of wind turbines.

To give an example The Winterbourne Wind Farm engaged Aviation Projects to do The Aviation Impact Assessment for the EIS. Aviation Projects recommended no lighting which ignored comments from various operators of low level aerial work. This is an area where there would be at times be low level high activity aircraft movements especially during bush fires.

There are many other situations where lighting would reduce the dangers of flying into or

loss of control due to rotor turbulence. For example medical retrieval, agricultural work and Visual Flight Rules pilots in inclement weather.

I have been in touch with CASA and they state it is outside their charter of restrictions as the turbines are further than 25 kilometers from a certified or registered Aerodrome. These rules would have been made long before any structure was anywhere near the height of wind turbines.

The problem with a Company like Aviation Projects making a recommendation of no lighting that is in the favor of the developer who is paying the bill. This is extremely dangerous system and the whole procedure should be reviewed to prevent any fatal accidents. Every environment where Wind Turbines are built will be different and should be assessed by CASA not a gov planning department that has no knowledge of aviation. Another example is two wind monitoring towers that are West of Walcha, that are, I estimate, over 100 meters high (only estimate).

They have no lighting and my understanding is they should have a daytime strobe on the top being monitoring towers. Why don't they and who is responsible for enforcing it?

Charles Koebel. Private Pilot .

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 7 December 2023 7:56:33 PM

Submitted on Thu, 07/12/2023 - 19:56

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Kay

Last name Wilson

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode SAUMAREZ PONDS 2350

**Please provide your view on the project** I object to it

#### Submission

No wind factories on agricultural land. Bad policy No need to spend thousands of hours of your bureaucrat paid time on any more guidelines.

None of these towers will ever be allowed onto private land. Do not break your own legislation that protects State reserves, State Forests and of course National Parks, by thinking the towers can be placed in these areas

#### I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 8 December 2023 11:12:44 AM

Submitted on Fri, 08/12/2023 - 11:12

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Duncan

Last name Cameron

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Walcha nsw

**Please provide your view on the project** I object to it

#### Submission

I am totally against this project you don't have social agreement with the community and you know that you can't run the country on wind and sun. You are supposed to protect the environment not harm it. The rest of the world is going away from this type of green energy because it doesn't work so why aren't you.

### I agree to the above statement

From:	EDWARD HALL
То:	DPE Energy and Resources Policy Mailbox
Subject:	So called renewables
Date:	Sunday, 10 December 2023 6:10:53 AM

It's simple no other country is using wind now in fact they are getting rid of it We do not want any wind farms either on the land or in our oceans period You want to help the environment Then build a new nuclear power plant Or use gas or hydrogen What you are proposing is only going to send power prices more sky high then they already are Sent from my iPhone

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Tuesday, 12 December 2023 4:15:23 AM

Submitted on Tue, 12/12/2023 - 04:15

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name Bradley

Last name Clifton

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** East Maitland N.S.W 2323

**Please provide your view on the project** I object to it

#### Submission

I object to the Wind power Generators. I object because the composite blades that I have heard only last ten years, take thousands of years to break down. I also object because they are an eyesore to look at and are visual pollution. I also object because the noise they make.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Tuesday, 12 December 2023 5:05:37 PM

Submitted on Tue, 12/12/2023 - 17:04

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Nathan

Last name coates

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Hargraves

**Please provide your view on the project** I object to it

#### Submission

The main guideline I believe should be compulsory is to have a 6 km set back from a dwelling and a 2 km from property boundary. Whichever is greater.

This is for non-hosts, and if the non-hosts agree to a lesser set back with a financial gain - that would be up to them.

This would give more certainty for the hosts/developer and the non-hosts. It would also speed up the approval process.

Developer's should supply a bond for removal of the turbines of \$600,000 per turbine at the start of the project. This would remove the threat of them draining the company of funds towards the end of the project and not pay for removal.

I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Tuesday, 12 December 2023 9:38:12 PM

Submitted on Tue, 12/12/2023 - 21:37

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name Ben

**Last name** Mohat

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2030

**Please provide your view on the project** I support it

**Submission** Move ahead with it asap

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 13 December 2023 1:41:40 PM

Submitted on Wed, 13/12/2023 - 13:41

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Stephen

**Last name** Pumpa

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2660

**Please provide your view on the project** I object to it

### Submission

Insurance:

Landowners bordering and within a 5km radius of large scale solar developments require indemnification in regards to insurance. Currently landowners can obtain 20 million or 50 million dollars worth of public liability insurance cover. This amount is sufficient to cover all rural expenses in regards to any disaster that could currently occur on a property, for example fire.

With the introduction of industrial solar power generation worth hundreds of millions of dollars next to farm land, the insurance needed to cover a disaster generated on a neighboring or nearby property is simply financially unviable.

Indemnity is needed to limit the solar company's ability to not claim above what

neighboring owners insurance allows, thus protecting these farming properties and homes from being sold up.

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 14 December 2023 5:51:55 AM

Submitted on Thu, 14/12/2023 - 05:51

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Martin

Last name Van Hees

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2318

**Please provide your view on the project** I object to it

#### Submission

we need to look at power supply that does not just rely on wind and solar. both are too u reliable and will also make our cost of living sky-rocket . have we looked at the cost of the environment as well. panels only last for 20 years. you are just going to give us higher bills and a unreliable power grid.

I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 15 December 2023 7:37:39 AM

Submitted on Fri, 15/12/2023 - 07:37

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Brian

Last name House

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2452

**Please provide your view on the project** I object to it

**Submission** Ugly windmills and solar panels, only way is to go nuclear power

From:	Planning Portal - Department of Planning and Environment
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 15 December 2023 5:10:11 PM

Submitted on Fri, 15/12/2023 - 17:09

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name Karl

Last name Sturmer

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2322

**Please provide your view on the project** I object to it

#### Submission

Renewable energy currently causes grid instability. It is increasing difficult for our base load generators to maintain stable grid inertia due to the on/off nature of solar and wind.

All future Solar and wind must be installed in conjunction with synchronous condensers and be capable of maintaining the same constant supply as a synchronous generator, ie gas, hydro, thermal.

It is irresponsible to allow such unstable generation to connect to the electricity grid.

It's about time policy makers understand that the electricity grid can only supply the amount of electricity that is being demanded of it at the instant that it is required. Renewables are not capable of this. Our power stations are the only reason we haven't blacked out.

### I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 15 December 2023 9:51:48 PM

Submitted on Fri, 15/12/2023 - 21:51

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Kyle

Last name Berry

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2324

**Please provide your view on the project** I object to it

#### Submission

Living so close to the hunter valley where we have such resources and infrastructure that are coal based and we mine it and send it overseas and not use it ourselves. Going green with the technology not being sufficient to cover our needs. We are a long way off going green and need to keep coal fired power stations open.. Complete madness of closing them when everything is already here to be used.

I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 16 December 2023 5:28:10 PM

Submitted on Sat, 16/12/2023 - 17:27

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Nick

Last name Mannell

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2260

**Please provide your view on the project** I object to it

### Submission

We don't want the wind mills destroying our marine life and view from the coast Bring back coal

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 17 December 2023 1:26:05 PM

Submitted on Sun, 17/12/2023 - 13:25

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Annette

**Last name** Gibson

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Weston nsw 2326

**Please provide your view on the project** I object to it

#### Submission

You are destroying our country with this pie in the sky ugly windmills and solar panels ,our waters,farming land, our picturesque scenery, I have an idea put them in the big city's and see how they like it

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 18 December 2023 11:03:50 PM

Submitted on Mon, 18/12/2023 - 23:03

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** John

Last name Oliver

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Belmont 2280

#### Please provide your view on the project

I am just providing comments

#### Submission

Firstly I would just like to say I think Govt would or should of already made plans for supporting a Higher Population & Business activity into the future with cleaner forms of Electrical Energy Production considering the time global politics has been trying to address Green House Gas Emissions & Second I believe it is silly to talk trying to reach Net Zero Emissions & would like us to be able as a relatively small Population to continue to use some of the Natural fossil fuel resources already dug etc out & ready for export because this makes Economical sense when half the work & emissions have already been done getting the raw product ready for export & then please try to use & encourage use of every kind of form of cleaner Electrical Energy Production that is already being used & worked on at being improved or invented & introduced or made more available & also other ways of Reducing Emissions like tunnels under Hills & roads & paths for pedal powered Bicycles & special train carriages for them & keep working on roads for better traffic flow & remove traffic signal pedestrian crossings half way up hills & any & everything including some wind turbine farms on Some Hill tops or along the Hav plains or from 1/2 way between Forbes to west Wyalong NSW, & where they are not near nature reserves or could start fires & use good quality ones & stuff like that, but please, please do not put wind turbine generator Structures as cluster like farms in Our NSW Coastal Waters on a Main Shallower Water loan on shelf marine environment & also loan marine species including Mammal Miagratory Path North/South that only exists Here along the Australian East Coast as there is no other main Migratory Pathway apart from way over on the other side of the Continent in W.A. or way over in South Africa or South America. The Turbine Structures will add effect & extra Hazards be it from noise pollutions & other effects & also from some other kinds of Pollutions that will impact on Marine life, That is already said to be at a critical level of Threat from Marine litter Pollutions & micro plastics & other factors & effects from Hazards impacting on marine life & High Wind & Heavy Rain or Flood Water Activity is pushing many different kinds of Pollutions out into Rivers & The Ocean, Where Wind Turbine Farms in our Waters will just add to that Pollution & impact on the marine environment & I cannot understand when trying to address stopping this kind of marine Pollution became a United Nations agenda to try & address & they declared war on marine pollution in 2012 they are not opposed to wind turbine farms in Oceans. Also If Wind Turbine Generators can't be sufficiently used to help use a variety of renewable energy sources on land & a huge Continent of Here, Then they don't appear very efficient & to place them in a marine environment suggests higher Operating Costs & they are not a Green form of Energy saving in there Construction to Operational Usage or continued operating & maintainence & service & running costs. Thankyou.

I agree to the above statement Yes

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 27 December 2023 8:14:52 PM

Submitted on Wed, 27/12/2023 - 20:14

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

## Name

**First name** Fay

Last name Walker

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Wollongong, 2500

**Please provide your view on the project** I support it

#### Submission

In the current challenge to develop renewable energy production and transmit the power to customers both household and business, I suggest that the most important aspect is meaningful consultation with each community. People need to feel included and part of the transition and what is more, each community will have different needs.

1. When planning to put wind or solar on farmland it is critical that farmers and their community agree on the most appropriate locations. There is an excellent example being developed by a farmer in Tasmania. There has to be benefit to the farmer.

2. The local community also needs to be sharing in the benefits that accrue to farmers. That is, those who live in towns and on the margins must also benefit.

3. The profits that are generated by the big corporations must be legislated so that a repeat of the fossil fuel outrageous influence on our political system is blocked. Recent examples that come to mind is the 'email' evidence that Santos had undue influence of the Fed Government's 'Sea Dumpling Legislation' 2023. A second example that we all suffered was

the exorbitant prices changed by the oil/gas mega corporations due to not saving power for the local market at fair prices ie first choice.

4. People who live in the cities and do not have access to the government subsidised solar panel initiatives need to be protected from unfair pricing now and into the future. All communities need to benefit.

5. The power lines seem to be the most contentious and so additional consultation resources will be needed to ensure acceptance, maintenance and ongoing development. Remember, we all rely on farmers for our food. Small Australian farmers also need protections from large agricultural corporations (who are often reported as foreign owned). Will the guidelines provide a clearer roadmap and strategy for the development of the renewable energy zones and transmission lines? If not, why are we embarking on this process?

The traditions from fossil fuels to renewable energy sources and a just society is too critical to obfuscate the process, roadmap and strategy. Please ensure the final document is easy to follow for us citizens as well as those engaging directly with the development. The objectives of the guidelines are excellent. I would add an additional objective in the end receivers also need to benefit in that the 'promise' of cheaper electricity needs to be guaranteed by legislation not just promises that we have experienced are easy to break.

#### I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 4 January 2024 12:05:29 PM

Submitted on Thu, 04/01/2024 - 12:05

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Anne

Last name Bowman

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Dunedoo

**Please provide your view on the project** I object to it

#### Submission

It is all in favour of developers rights not landholders rights. There is no consideration to the overall impacts on agriculture. The impact of all the renewal projects on agriculture will be immense as well as the small communities involved..

The people doing all the surveys are not from the area and have no idea of the impacts on the land, flora, fauna and the community as a whole.

I agree to the above statement

From:	Planning Portal - Department of Planning and Environment
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 8 January 2024 9:40:49 AM
Attachments:	kee-li-submission-to-nsw-dpedraft-energy-policy-framework_08012024.docx

Submitted on Mon, 08/01/2024 - 09:32

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

## Name

First name Kee

**Last name** Li

I would like my name and personal contact details to remain confidential No

## Info

Email

Suburb/Town & Postcode Sydney 2000

**Please provide your view on the project** I support it

Submission file <u>kee-li-submission-to-nsw-dpe---draft-energy-policy-framework\_08012024..docx</u> (45.38 KB)

**Submission** Please see attachment for submission.

#### I agree to the above statement

8 January 2024

Energy and Resource Policy Unit Department of Planning and Environment NEW SOUTH WALES

# Submission to NSW Department of Planning and Environment – Draft energy policy framework

Dear NSW Department of Planning and Environment

The NSW Government recently introduced its landmark *Climate Change (Net Zero Future) Bill 2003*, setting the State's reduction target on greenhouse gas (GHG) emissions by at least 50 per cent from the 2005 level by 2030. The passing of the Bill complements the Federal Government's GHG reduction target and provides strong legislative support for Australia to reach 82 per cent renewable electricity generation by 2030.

One of the important features of the Bill is the 'Guiding principles' under Part 2, section 8. The principles acknowledge, for example, the critical need to address climate change – a serious threat to New South Wale's social, economic and environmental wellbeing. For the first time, the State-level Bill also recognises that the action to address climate change should be regarded as the universal right to a clean, healthy and sustainable environment – a fundamental human right that was declared by the United Nations General Assembly in 2022. While energy consumption is not the sole contributor to GHG emissions, it accounts for more than three-quarters of total GHG emissions globally. To achieve our net-zero targets, the State requires a significant uptake of renewable electricity generation, at least 2,000 km of new transmission lines and the rapid electrification of households and businesses before 2030.

While governments, industries and communities have the best intentions to build a sustainable electricity grid, the progress so far has not been as satisfactory as it should be. A recent review commissioned by the Clean Energy Investor Group (CEIG), shows that, planning approvals for a renewable energy project in NSW take three times longer than other States. In the past five years, only one wind farm project has been approved in NSW, and it took almost ten years to reach all necessary approvals (CEIG's review was published before the recent Yanco Delta wind farm approval).

The industries, regional communities, and project proponents need certainty and clarity to address complex topics such as environmental planning approvals, supply chain preparations and social licence. The release of this draft energy policy framework and the associated guidelines is timely to provide the much-needed guidance for a smooth transition

to energy net-zero for NSW. I appreciate the opportunity for public comments on this critical policy framework.

# Transmission infrastructure – early engagement to set the right community expectation

Last year, the Australian Energy Market Commission (AEMC) introduced a rule change process to the *National Electricity Rules* to enhance community engagement in transmission building. The new Rules set the community engagement expectations and a broader definition of interested parties that transmission project proponents must engage with from the regulatory investment test for transmission (RIT-T) stage. Following that, the Australian Energy Regulator (AER) in October 2023 released its *Directions Paper* on social licence for electricity transmission projects, seeking public feedback on engagement expectations, outcomes and a more prudent cost recovery model for transmission network service providers (TNSPs) to carry out engagement activities. I provided submissions to both the AEMC and AER during their public consultations.

Effective community engagement is fundamental to gaining the social licence needed to expand the transmission network. I commend the DPE for including the 'Foundation principles' under section 3.1 in Part 3 of the *Draft Transmission Guideline*. The principles reflect the critical need for communities to fully comprehend the intricacy between cost efficiency, the environment and social impact when a project proponent designs and selects the transmission route. As explained in the Guideline, the cost of building transmission lines is ultimately passed on to consumers through electricity bills. The affordability and deliverability of new transmission infrastructure should be a significant factor in the evaluation of route options.

The AER's draft *Directions Paper* on social licence for electricity transmission projects requires the project proponent to include an engagement plan outlining the engagement approach to build and maintain social licence. The AER's recommendation aligns with my submission to the AEMC's rule change on enhancing community engagement for major transmission projects (which <u>can be found here</u>). In my submission to the AEMC, I recommended that all transmission project proponents reflect elements of the community engagement expectations in an overarching community engagement plan. The engagement plan should be place-based and project-specific. The AEMC referenced my suggestion in its *Final Determination* in section 3.2, 'Clarifying how transmission network service providers (TNSP) are expected to engage with local community,' which <u>can be viewed here</u> (p.30).

To ensure community engagement is fit-for-purpose and efficient, I continue to advocate for an overarching community engagement plan (or community communications plan as it is called at times) as a planning approval condition, and I recommend the DPE's final *Transmission Guideline* to require all transmission projects to articulate clearly:

- why the infrastructure is essential in the chosen region,
- how the route corridor has been selected and has balanced between economic, engineering, environmental and social factors,
- what channels the community can get information from and interact on,
- what activities the project is proposing to engage the community,
- what role the community can play and how feedback, including knowledge from First Nations, is considered, reported or incorporated,
- what benefits the project will bring to the local community.

Community engagement is mandatory for State Significant Infrastructure (SSI) and Critical State Significant Infrastructure (CSSI) planning approval pathways. However, a well-developed, project-specific community engagement plan for transmission projects will significantly enhance the clarity of engagement expectations for the project and provide confidence to the community about their role in the engagement process. In December last year, the NSW Independent Planning Commission approved the Oxley Solar Farm and Battery project in Armidale with several conditions due to local community opposition. Among the strict environmental measures, one of the requirements is for the project proponent to prepare a Community Communication Strategy to facilitate communication between the applicant, council and the community during design, construction and operation. I recommend that the DPE formalise such a requirement in its final *Transmission Guideline* to provide consistency and engagement certainty to the project proponent and community.

# Benefit sharing – bringing long-term benefits to hosting communities for renewable energy infrastructure

Benefit sharing from renewable energy projects comes in various forms and mechanisms. When developed appropriately and implemented in good faith, benefit sharing programs can build long-lasting relationships within the communities where these projects operate, broaden the project beneficiaries and help proponents build the reputation of being a good corporate citizen. I agree with the 'Policy Principles' introduced in the *Draft Benefit Sharing Guideline* that benefit sharing programs must be a standard practice, collaborative, transparent, community-focused, proportionate and having a long-term impact. I also agree with the Guideline that benefit sharing, be it directly or indirectly, should not be used as a mitigation measure to reduce landowner complaints.

The benefit sharing mechanism as a result of large wind and solar developments has had many successful examples across Australia and overseas. Unlike other infrastructure and industrial developments in regional Australia, such as a new airport, port or mining site where a large workforce is needed beyond the project delivery, renewable projects require a lower level of ongoing local employment after the construction phase. This characteristic creates an opportunity for renewable developers to establish community-focused, longer-term programs, so rural communities can continue seeing the broader benefits brought by these renewable projects. Hosting communities for renewable energy projects have repeatedly highlighted their vital interests in the community benefit scheme and jurisdictional benefit-sharing framework. The concerns about the project's tangible social benefits to the region, how and when funds are distributed, and who will govern the scheme remain prominent throughout various engagement processes and in many engagement forums. It is evident that benefit sharing schemes proposed by renewable energy developers must be consulted with, endorsed by, or, if possible, co-designed with the local community before they are included in the SSD or CSSD planning applications.

The not-for-profit community advocacy organisation, Re-Alliance, recently published research into community benefit funds (CBF) established by renewable energy developments nationwide. Among several fundamental principles for best-practice CBF, the research highlights the significance of building context-based solutions via CBFs to address deep-rooted local issues or answer unmet local needs. The Victoria Government also published a benefit sharing guideline for renewable energy developers in 2017 (updated in 2021). The Guideline encourages developers to consider aspects such as whether the local communities are part of the scheme's design, and if local government plans have been sourced to guide the development of the benefit sharing program.

In my recent submission to the Australian Energy Infrastructure Commissioner's (AEIC) review of community engagement practices, I emphasised the importance of partnering with local councils that work closely with their constituents to make important decisions impacting people's daily lives. There are 128 councils in NSW, which facilitate well-established community interest groups, local history groups, bushcare and environmental groups and business support associations. Local councils also constantly listen to their constituents via community consultation channels, ensuring community and stakeholder needs are reflected in the decision-making process.

Under the *Local Government Act 1993*, each council must create a strategy for how they will engage the community in creating and reviewing their Community Strategic Plan – a document crafting the community's vision and aspirations for at least ten or more years. These Community Strategic Plans include analysis and data of specific socio-economic gaps within the LGA, and they are a good source of truth for benefit sharing programs to address local needs such as road upgrades, housing, local employment, education and skill development. A benefit sharing scheme is only effective if it provides long-term value to the communities and improves the hosting communities' vitality and resilience beyond the project's lifecycle. I recommend that the DPE's *Benefit Sharing Guideline* require renewable energy developers to refer to the various local government community strategic plans when they develop their benefit sharing programs as part of the planning approval application.

The NSW Government has an ambitious target of reducing GHG emissions by 50 per cent from the 2005 levels by 2030. The rapid increase of renewable energy generation and a coordinated rollout of a stable transmission network to connect these renewable sources are undoubtedly essential to achieving our net-zero target. I commend the NSW DPE for the timely release of these important guidelines to improve clarity, transparency and certainty for the planning approval processes of transmission and renewable energy developments. I thank the NSW DPE for the opportunity to provide feedback on the draft policy framework via the current engagement process. If you have any queries or want further clarification concerning this submission, please do not hesitate to contact me on 0423 368 368 or via keeli.carrigy@gmail.com.

Yours sincerely,

#### Kee Li Community engagement practitioner

#### About the author

Kee Li is a leader in community engagement with 18 years of experience in both the public and private sectors across energy, utilities, transport and government agencies, building social licence, community trust and a more inclusive decision-making process.

Kee currently heads the regional engagement team at Sydney Water which supports community and stakeholder engagement for over 500 infrastructure projects per annum, from planning to design, delivery and facility maintenance. The team includes more than 40 engagement practitioners and is the first in Australia and New Zealand to adopt the NEC4 contracting framework for a collaborative enterprise engagement model.

Kee is a member of the International Association of Public Participation (IAP2). He holds a Bachelor of Social Science and a Master of International Law and Public Policy specialising in energy, climate change and environmental planning policy.

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 24 January 2024 4:08:11 PM
Attachments:	submissionwind-guidelines.docx

Submitted on Wed, 24/01/2024 - 16:04

Submitted by: Anonymous

Submitted values are:

#### Submission Type

I am making a personal submission

## Name

First name Margaret

**Last name** Hawkins

I would like my name and personal contact details to remain confidential No

## Info

Email

**Suburb/Town & Postcode** WALCHA

**Please provide your view on the project** I object to it

Submission file submissionwind-guidelines.docx (16.8 KB)

**Submission** P lease find the attached file of my objections.

I agree to the above statement Yes

#### **Renewable Energy Draft Guidelines**

#### Marg Hawkins Submission

I wish to express my objections to the draft guidelines in several areas.

 I am amazed and horrified that you do not consider the possible or likely viability of projects as a primary consideration before approving them. These projects are huge, costly and very disruptive to the community when being built, apart from attracting large grants of government (and therefore taxpayer) funding. Under the "Advancing Renewables Program". To give these grants to proposals that have no chance of ever making money seems an appalling misuse of our money! In many cases, the initial proposals are lodged by companies that have no intention of actually running the enterprise, they are simply after the large payouts and then intend to on-sell the project, so its financial viability is of no consequence to them. Two examples of grants that have gone nowhere are :

Dungowan Pumped Hydro, given a grant of \$500,000

And Thunderbolt Energy Hub, also given \$500,000.

The community will very quickly become totally disillusioned if projects are supported, the infrastructure is built, and then they fail to deliver and are closed down , leaving a ruined landscape. Accurate and verifiable wind readings over a number of periods of time should be an absolute minimum requirement before going any further! Distance of carting necessary materials and amount of roadwork needed should also be major considerations .Accreditation of project developers, to get rid of Carpetbaggers, would be a very sensible step to take!

- 2) I can not believe that you consider 100metres to be an adequate distance between a National Park and a Wind Tower. This is absolutely ludicrous to the point of being criminally negligent! The disruption to the area during the building process alone would be disastrous, let alone the ongoing impact of the towers. To a bird such as a wedge-tailed eagle, a yellowtailed black cockatoo or a casuarina cockatoo, it would simply be the next tree! This guarantees that birds would be killed and, in my mind, this is criminal negligence. Our property is bordered on two sides by National Park, and these birds as well as many others fly regularly over our entire property. Arboreal animals like koalas bats and possums would similarly be affected. The MINIMUM distance from a National Park needs to be 10km! This is even more important for World Heritage areas and Wilderness areas!
- 3) Aviation safety is another area that is inadequately dealt with in the guidelines. Areas such as Walcha rely on aviation for many activities such as spreading fertilizer and herbicides, as well as carrying out feral animal control programs, and aviation is critical for fire spotting and fighting as well as emergency rescue. The guidelines do not adequately ensure that these activities will be able to continue.
- 4) The noise impact of wind farms is another area that is inadequately covered. As the towers get bigger, the noise level increases and the distances from habitation need to be increased to adequately allow for this. We know of people who are sleeping in their cars to get away from the increasant noise, and others who are forced to pack up and move.
- 5) The impact on local roads also needs more attention. Many country roads are narrow and windy, with no places for safe overtaking and often poor forward visibility. In addition, they often have grazing stock or travelling stock on them. School buses use them twice a day on schooldays. The traffic involved in building wind farms is totally outside their capacity, and local councils struggle to keep them trafficable as it is, without the impact of huge numbers

of trucks. Local residents travelling to and from Walcha and surrounding towns would be put at risk of death or injury.

6) Decommissioning is an area that urgently needs attention! The figures discussed in the guidelines are for nett cost after selling scrap, which is not a realistic way of looking at it. Many of the components, including the blades are not recyclable and would be a nightmare to dispose of. The price of scrap varies enormously, depending on supply and demand, so any prediction of possible return is largely guesswork. The cost of transporting the scrap away to be recycled would be huge, particularly from relatively remote rural areas. In many cases the transport costs would be greater than the return even if a market could be found. What do you do with the 20000 tons of concrete under each wind tower?

I believe that there should be a percentage of the grant paid for these projects should be placed into a separate account, (rather like superannuation)not given to the project owner but to be retained until the time for decommissioning. This money remains part of the project, so that at the end there are funds available for decommissioning regardless of how many times the ownership of the project has changed. Is can be earning interest over the life of the project.

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 24 January 2024 5:51:55 PM
Attachments:	adrian-submissio1.docx

Submitted on Wed, 24/01/2024 - 17:50

Submitted by: Anonymous

Submitted values are:

#### Submission Type

I am making a personal submission

## Name

**First name** Adrian

**Last name** Pollard

I would like my name and personal contact details to remain confidential No

## Info

Email

Suburb/Town & Postcode Walcha

**Please provide your view on the project** I object to it

Submission file adrian-submissio1.docx (15.11 KB)

**Submission** Please find attached my objections.

I agree to the above statement Yes

#### Adrian Submission.

#### Draft wind Guidelines.

Concerning the proposal that no wind tower should be erected less than 100 metres from a National Park: 100 metres - are you joking- this is just plain stupidity. I cannot believe that some intellectual pygmy or pygmies actually get paid by taxpayers to dream up such drivel- it's mind-boggling nonsense. These towers are nearly300m tall. The effect on wildlife during and after construction has obviously not been taken into consideration. One wonders why the National Parks and Wildlife Service is not screaming its head off.

The Glen Innes Wind Farm has proved beyond doubt that these monstrosities are killing wedge tailed eagles at an alarming rate. What is being done by government agencies whose job it is to protect our flora and fauna? It is unbelievable and upsetting that those at government level see them as expendable. Future generations will condemn this appalling lack of action.

Decommissioning: at the meeting in Walcha on November 30<sup>th</sup> 2023your representatives, when questioned about the cost of removal of these wind towers, stated that it could be as low as \$3000 after recycling. Let us think about this for a minute. In 15 – 18 years' time when government subsidies have run out and a 280 m tower complete with 3 massive blades needs to be pulled down, how will this be achieved? The crane that is used to put it up is so big that it arrives on site dismantled into transportable sized sections. It has to be assembled on site, then dissembled and moved for each tower. Can you imagine the cost in this operation alone. The next thing to consider s that the blades are not recyclable – in America they are digging huge" graves "to bury them in. Then we need to think about the 2000 tons of concrete under each wind tower. How will this be removed? Maybe programs could be run for the unemployed, chipping away for the next 100 years, or maybe a government think tank of intellectual pygmies might come up with a better idea, we wait with baited breath!

In effect they are a giant environmental liability that future generations, trying to deal with may well say" how could they have been them so bloody stupid?"

In Europe they are cutting them up and shipping them to African countries where they are dumpedonce again the hypocrisy and stupidity is unbelievable- a case of destroying the planet to save the planet. When will our fearless leaders wake up to the fact that global warming/ climate change is the greatest scientific fraud in human history.

That \$3000 for disassembly of each wind tower was based on the money recovered from the sale of scrap metal. When this was announced to the assembled crowd of concerned Walcha locals the crowd burst into laughter. Here we have another intellectual pygmy in a government department predicting what the price of scrap metal will be in 15 - 18 years' time, once again unbelievable. I suggest we transfer this genius to the Bureau of Meteorology where his or her skills might be able to get the weather forecast for the next week somewhere near accurate.

The question of who pays for the removal of these blights on the landscape is one that has not been adequately addressed. The companies involved in the construction of wind farms and solar panels in the Walcha area have not included any financial provision for their removal. Who pays when these reach their use-by date? The property owner, who has foolishly hosted them- the council- the State government or the Federal government who has been paying the owners of the development around \$1000,000 per tower per year. They even get paid not to produce electricity. Once again, which bunch of intellectual pygmies, paid for by the Australian taxpayer, put this package together? The

developers must view the Australian Government as their very own Patron Saint. If it wasn't so tragic for the Australian environment and economy, it would be laughable.

The only solution to save future overwhelming financial pain is for it to be mandatory on the part of the developer to lodge funds into a superannuation type account. This must be protected by government legislation. In the likely event of the developer or developers declaring bankruptcy and riding off into the sunset with their ill-gotten gains there will be funds available to remove these barnacles on the arse of the Australian landscape.

America and Europe are littered with derelict and collapsed wind towers- no one seems to know what to do about this desecration of the landscape. probably no-one can afford to remove them. Do we want to replicate this disaster in Australia? I think not!

#### WAKE UP AUSTRALIA!

From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Wednesday, 24 January 2024 6:19:29 PM
Attachments:	appendix-gdecommissioning-rehabilitation-planfeb-2014.pdf

Submitted on Wed, 24/01/2024 - 18:00

Submitted by: Anonymous

Submitted values are:

#### Submission Type

I am making a personal submission

### Name

First name Carol

Last name Richard

I would like my name and personal contact details to remain confidential No

## Info

Email

**Suburb/Town & Postcode** Cassilis 2329

**Please provide your view on the project** I object to it

Submission file appendix-g---decommissioning-rehabilitation-plan---feb-2014.pdf (1.68 MB)

#### Submission

Draft Wind Energy Guideline 2023 Decommissioning and Rehabilitation 5.7 and the Liverpool Range Windfarm Decommissioning from first proponent Epuron date 2014 - Now Tilt - appear to be at odds in regard to costs and recycling options. Each states life of windfarm 25-30 years.

Similar details apply to solar farms.

If the life of these energy producing projects is 25-30 years, AND there is no refurbishment, why is there no similar decommissioning and rehabilitation guideline for the transmission lines which will have no further use after 25 to 30 years.

While landowners hosting windfarms and solar farms are willing to have these income

producing structures on their properties, landowners with transmission lines dissecting and devaluing their properties, with heightened risk of bushfires are being forced by compulsory strategic infrastructure rules to put up and shut up - without any decommissioning and rehabilitation protections. This is a gross and culpable oversight by government.

#### I agree to the above statement

# Liverpool Range Wind Farm

Decommissioning & Rehabilitation Plan | February 2014

# EPURŮN

# Liverpool Range Wind Farm

Decommissioning & Rehabilitation Plan | February 2014

**Prepared By:** 

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Figure 1-1 Site layout overview for the proposed Liverpool Range Wind Farm

# 1 Introduction

Development of the Liverpool Range Wind Farm involves the construction, operation and decommissioning of a 288 turbine wind farm and its associated infrastructure. This plan sets out the decommissioning and rehabilitation works required at the end of the wind farms 30 year operating life and land Lease term.

In December 2011 Draft NSW Planning Guidelines for Wind Farms (Guidelines) were released. Sections 1.3(f) of the Guidelines address the following decommissioning and rehabilitation requirements for wind farms at the end of their operational life;

- The proponent/wind farm owner rather than the "host" landowner must retain responsibility for decommissioning, and
- The proponent to include a Decommissioning and Rehabilitation Plan in their environmental assessment report.

The Proponent is committed to fulfilling the wind farm decommissioning and rehabilitation obligations specified in the Guidelines. This plan has been developed so these obligations can be satisfied for the Liverpool Range Wind Farm and forms part of the project's Environmental Assessment.

### 1.1 Project Description

The proposed 288 turbine Liverpool Range Wind Farm is located to the east of Coolah and north west of Cassilis, New South Wales. The site is approximately 325 km north west of Sydney in the New England Tablelands and is located on freehold land and leasehold land within and adjacent to agricultural areas, predominantly use for grazing sheep and cattle.

The site has been selected for its exposed windy ridges, cleared grazing land and proximity to the national electricity grid. The majority of the land in the region is currently used for commercial agriculture (sheep and cattle grazing) purposes and has been cleared and grazed over many decades.

The wind farm is partly located in Warrumbungle Shire Council, Upper Hunter Shire Council and Liverpool Range Shire Council and its immediate surrounds as being within Zone 1(a) Rural, RU1 and RU2 rural zones. The power line is situated in the Mid Western Regional Council. The development is being assessed by the NSW Department of Planning and Infrastructure as a Major Project under Part 3A of the EPA Act 1979.

The primary components of the wind farm include;

- > 288 wind turbines including nacelles, towers and blades
- Foundations and civil structures
- Access roads and watercourse crossings
- Hard stands and lay down areas
- Underground cabling and overhead powerlines
- Substations and associated electrical equipment
- Operations and maintenance facilities
- Storage areas and car parks
- Wind monitoring masts and communications equipment

The proposed layout of the Liverpool Range Wind Farm is shown in Figure 1-1 below.

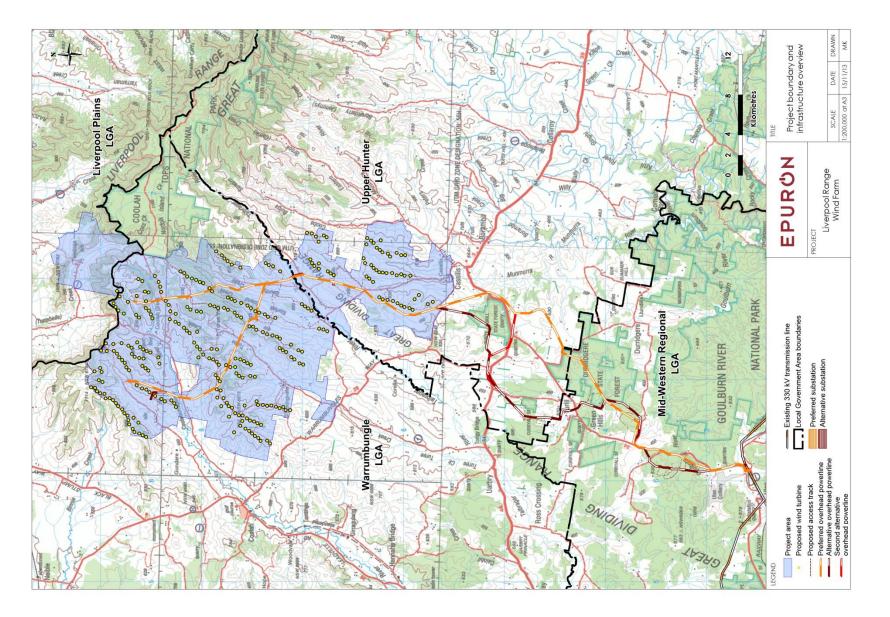


Figure 1-1 Site layout overview for the proposed Liverpool Range Wind Farm

# 2 Decommissioning and Rehabilitation

## 2.1 Decommissioning Commitment

The expected commercial life of the Liverpool Range Wind Farm will be up to 30 years once commissioned and placed into operational service at the end of the construction phase. At the end of the operational life the wind farm will be decommissioned and removed from service in accordance with this plan or the wind farm may be refurbished and repowered for a further 30 years. The option to refurbish and repower the wind farm is subject to a decision by the Proponent at the time and is influenced by future market conditions.

Consistent with the Guidelines the Proponent is committed to its obligation to decommission and rehabilitate the Liverpool Range Wind Farm site at the end of its operational life and Lease term. The Lease agreements between the Proponent and the wind farm landowners set out the terms requiring the Proponent to undertake decommissioning and rehabilitation the site.

An extract of the relevant clauses from the Lease Agreement is shown below;

- Clause 11.1 Removal of Wind Farm Operator's Property and remediation
  - (a) Unless the Landowner and the Wind Farm Operator have entered into a further lease of the Land, the Wind Farm Operator must, where practicable by the Actual Termination Date and in any event within one year of decommissioning of the Wind Farm:
    - (i) remove all the Wind Farm Operator's Property from the Land; and
    - (ii) return the Land, as far as practicable, to its condition before the commencement of Construction Activities on the Land (insofar as the change in condition of the Land since that time is attributable to the Wind Farm or the use of the Land by the Wind Farm Operator), subject to clause 11.2.

#### 2.2 Decommissioning Funding

Decommissioning the wind farm at the end of its commercial life is the Proponents obligation and cost. It would involve reinstating similar access road arrangements to construction, and would require access for large cranes and transport vehicles to dismantle and remove the turbines and other equipment. All underground foundations, cable trenches and other infrastructure would remain in situ and all above ground infrastructure would be removed unless requested to remain by the landowner. The decommissioning period is likely to be significantly shorter at around 12-18 months and with significantly fewer truck movements than the construction phase.

It should be noted, based on current market data, that the sale value of recovered turbine materials and other equipment is predicted to exceed the costs of their dismantling and site rehabilitation. In today's terms it is estimated the decommissioning works will cost in the order of \$103-115 million while the sale value of recovered equipment and materials is around \$123-138 million. Should this positive cost / sale balance tip negatively in the future the Proponent has agreed to ensure an appropriate financial instrument is put in place to ensure the works can be funded. A bank account is the financial instrument to the used.

The decommission works cost estimate has been based on the advice of a turbine supplier with experience in Australia and an industry wide accepted value for the construction of wind farms and extrapolated across the site. It is estimated that the cost of building a wind farm is approximately \$2 million per MW installed and this includes the cost of the turbine unit, transformers, shipping from the manufacturer to the site, erection and commissioning as well as the associated civil and electrical works to connect to the electricity grid. As a percentage of the \$2 million per MW estimate, the cost of transport from port to site and erection amount to 8% of the total. As the same processes used in construction will be used in decommission (i.e. use of cranes, electrical decommissioning and supervision), it has been assumed that this method will provide a good estimation of the costs. This leads to a total estimated decommissioning cost in the region of \$103-115 million or approximately \$380,000 per turbine. This estimate is on par with other wind farm developments that have recently been approved in New South Wales.

Current sale prices of refurbished wind turbines vary significantly due to in improvement in technology in recent years and name plate capacity increasing. A list of currently available refurbished wind turbines can be seen in Attachment

1. The sale prices range between 105,000€ - 295,000€ for turbines with a much lower rated output than those proposed for the Yass Valley Wind Farm.

#### 2.3 Host Landowners and Decommissioning

Landowner's contracts contain clauses relating to the decommissioning of the wind farm. An extract of the relevant clauses from the Lease Agreement is shown below;

- Clause 11.5 Decommissioning and Remediation Fund
  - (a) At any time, but no earlier than five years before the Terminating Date, the Wind Farm Operator will arrange for the creation of a fund (Decommissioning and Remediation Fund) into which the Wind Farm Operator must deposit funds which will, when combined with interest earned, be sufficient at the Terminating Date to cover the Wind Farm Operator's likely costs of complying with its decommissioning and remediation obligations under clause 11.1 and 11.2. The fund shall be maintained by a mutually agreed escrow agent in accordance with the terms and conditions of an escrow agreement between the escrow agent, Landowner and Wind Farm Operator until such time that the obligations under clause 11.5(c) have been satisfied. If the Wind Farm Operator has not completed its decommissioning and remediation obligations under clause 11.1 and 11.2 within 12 months of the Actual Termination Date, the Landowner may give notice of the breach, and if the Wind Farm Operator does not rectify the breach within 60 days:
    - (i) control of the Decommissioning and Remediation Fund shall be immediately given to the Landowner; and
    - (ii) the Landowner may apply the Decommissioning and Remediation Fund or an appropriate part of it toward remedying that breach.

# 3 Stakeholder Consultation

#### 3.1 Wind Farm Landowners

As part of the overall wind farm consultation process the Proponent discusses decommissioning and rehabilitation requirements with the host wind farm landowners during agreement negotiations. The requirements of the parties in this regard are documented in the Lease Agreement but fundamentally place the obligation for decommissioning to be the responsibility of the Proponent.

While the Proponent has committed to decommission the consultation process indicates that most wind farm landowners may prefer some components of the wind farm infrastructure to remain on their land after the decommissioning process. The retention of these improvements is seen by the landowners to enhance their ongoing farming practises and potentially includes infrastructure such as;

- access roads and watercourse crossings
- fencing, sheds and storage facilities
- planted vegetation

The Proponent recognises that the wind farm landowners views may change over time regarding decommissioning requirements or if land ownership changes. Accordingly, keeping in mind the current desire of the wind farm landowners to retain some components of the wind farm after decommissioning, the Proponent accepts the responsibility for decommissioning all components of the wind farm in line with this plan. Consultation with the wind farm landowners would be revisited prior to the decommissioning phase, to make sure their requirements at that time are incorporated into the plan.

#### 3.2 Community

Consultation with the community regarding decommissioning will be undertaken well in advance of the commencement of the wind farm decommissioning works.

They key objectives of the consultative process will be to:

- Ensure the local community and stakeholders are appropriately informed about the planned decommissioning works in advance,
- Seek feedback from the community and local authorities regarding any concerns regarding the decommissioning works,
- Consider and incorporate any feedback from the community and local authorities, where possible, into the decommissioning plan.

Key issues to be addressed during the community consultation will include:

- Program and staging of the planned decommissioning works necessary to minimise impacts on farming activities and the community,
- Management of traffic and transport matters on the wind farm access roads,
- Maximise local employment opportunities to ensure local participation in the works where possible,
- Coordination of logistics to ensure adequate availability of contractor supplies, accommodation and local services.

The Proponent has established a Community Consultation Committee for the project which will remain active until completion of the decommissioning phase. The CCC's role will be to provide information to the community and to inform the Proponent of their feedback. The CCC provides an alternate forum for consultation between stakeholders.

# 4 Planned Scope of Works

The Proponent will engage appropriate contractors and specialists to undertake the wind farm decommissioning and rehabilitation works once the wind farm has reached the end of its commercial life. Manufacturer equipment manuals and procedures, where available, will be utilised to guide decommissioning and dismantling activity. The decommissioning works are expected to be completed in around 12-18 months from commencement.

The current plan is to sell recovered equipment and material wherever possible to fund the works. As such it is expected the decommissioning process will be carried out with due care and accuracy to ensure the resale value of all recovered equipment and materials are preserved.

#### 4.1 Wind Turbines

At the end of their commercial life turbines will be shut down and removed from active service and physically disconnected from the electrical infrastructure in order to make safe before the dismantling process commences. Once safe and ready for dismantling all liquids will be drained and contained (oils, grease, lubricants and coolants, etc.) and any other consumable or disposable items will be removed where necessary. Captured wastes and materials will be recycled or reused wherever practicable to do so, and if not practicable, disposed of at an appropriate waste facility. Any handling, storage and disposal of waste material will be carried out in accordance with the project's Waste Management Plan.

Dismantling of the turbine blades, nacelle and tower will be generally carried out in the reverse sequence to their original assembly during construction. Dismantling will involve disassembly of the various components, which will be lowered by crane and transported to a storage / laydown area before removal from site for sale to market.

It is expected that all waste metallic components would be recovered and sold or recycled with no material going to waste. Any other non-metallic waste materials such as plastics, composites or civil material that could not be feasible reused or recycled would be recovered and crushed or compacted and disposed of in an appropriate waste facility.

#### 4.2 Electrical Transformers

Selection of the preferred wind turbine model will ultimately reveal the type, size and location of the turbine electrical transformers. Some turbines require the transformers to be mounted inside the turbine tower while others are mounted externally on a concrete foundation and inside a weatherproof housing. To decommission the transformers they must be shut down, removed from service and made safe. To dismantle the transformers they must first be allowed to cool before removing and containing all liquids (oil) prior to transporting off-site for resale. Transformer foundations will remain in situ below the ground while all exposed cabling, conduit and housings are removed. The concrete foundations would be covered with a layer of compatible sub-grade material and would be graded to preserve the slope of the surrounding area. The ground will be dressed with compatible topsoil, and planted with appropriate grasses or foliage to reintegrate it with the surrounding environment.

Some electrical transformers, substations and grid connection equipment on the wind farm site may be owned and operated by the network operator, currently Transgrid. The responsibility for decommissioning this equipment remains with the network owner / operator and their processes and procedures would apply to their equipment.

#### 4.3 Underground Electrical Cabling and Overhead Powerlines

Underground electrical cables may be installed at varying depths, depending on the rating and type of cable conductor used, but will likely be installed at depths of at least 1m. Underground electrical cabling will not be removed during decommissioning and will be deactivated and left in situ. The cables contain no materials considered harmful to the environment and the process of digging them up and removing them is often considered to have a far greater impact on the environment than leaving them in situ. Many of the underground cabling will be installed under the wind farm access roads and leaving the cabling in place is unlikely to have any impact on future farming practises, particularly if the access roads remain in place after decommissioning. Should underground electrical cabling need to be removed, they will be removed in such a way to minimise impact on the surrounding area as much as possible. Any disturbed areas would be backfilled with compatible sub-grade material and would be graded to preserve the slope of the surrounding area. The ground will be dressed with compatible topsoil and planted with foliage to reintegrate it with the surrounding environment.

All overhead electrical cabling and powerlines will be dismantled, removed and materials reused or sold where possible. The powerline poles will be removed and the holes filled in with compatible sub-grade material and revegetated. In locations where potential environmental damage from complete extraction of the powerline pole may outweigh the benefits, the pole will be cut off at ground level.

#### 4.4 Access Roads

Wind farm landowners are likely to seek the retention of access roads at the time of decommissioning as they provide a benefit to their ongoing farming practises. In the event decommissioning of the access roads is required, the gravel topping and sub layers will be removed and transported to an appropriate disposal location. Disposal may include reuse as land fill on site if required, or at an offsite location. All associated access road infrastructure including drainage structures, culverts and crossings will be removed and reused where possible, or disposed of at an appropriate offsite location. Cleared areas would be backfilled with clean, compatible sub-grade material and would be graded to preserve the slope of the surrounding area. The ground will be remediated as appropriate and dressed with compatible topsoil and planted with grasses or foliage to reintegrate it with the surrounding environment.

#### 4.5 Foundations

The wind farm may comprise a mix of both gravity type and rock anchor type foundations for installation of the wind turbines. Determining which type of foundation will be used is finalised during the pre-construction phase depending on the specific geology existing at each wind turbine site. A gravity foundation is essentially a large block of reinforced concrete installed 2-3m below the surface while a rock anchor foundation drills deep into the ground and fixes steel cables into the rock about 20-25m underground. Regardless of the underground foundation used it will not be removed during decommissioning as the disturbance is not necessary and the underground foundation is considered to cause no harm by remaining in situ. All protruding electrical cabling, conduit and other structures are removed and the foundations are covered with a layer of compatible sub-grade material and graded to preserve the slope of the surrounding area. The ground will be dressed with compatible topsoil and with grasses or foliage to reintegrate it with the surrounding environment.

#### 4.6 Hardstands and Laydown Areas

Hardstand areas are generally constructed in a similar manner to access roads but may have an increased level of compactness for crane lifts. Laydown and storage areas are also constructed in a similar manner to access roads and are often large flat areas of well drained land set aside for storage purposes. Remediation of these areas would be the same as for access roads but it is likely some areas may also be retained by the wind farm landowners for future farming use.

#### 4.7 Operation and Maintenance Facilities

During the operations of a wind farm a number of buildings and structures are required to accommodate offices, amenities, storage, control room and general maintenance facilities including car parks. This can be achieved by refurbishing existing structures or constructing purpose built facilities. It is expected these buildings and structures will be retained on site by the landowner once wind farm decommissioning is completed. If the buildings are to be demolished and removed, this would be undertaken in accordance with standard demolition practices for buildings of this nature.

# 5 Rehabilitation Monitoring

The planned rehabilitation activities are designed to reintegrate any disturbed area with the surrounding land and existing vegetation to a condition similar to that existing prior to construction. It is possible initial rehabilitation works may be ineffective in some areas due to erosion, farming intrusion or topographical effects impacting the rehabilitated area. Similarly, it is possible initial reseeding, re-grassing or vegetative replanting activities may be unsuccessful due to inappropriate coverage or weather effects. To ensure the rehabilitation program is successful in the longer term, periodical site monitoring will be undertaken for up to 2 years following decommissioning. It is likely the monitoring will be undertaken by the host landowners in the first instance and any remediation works carried out by the Proponent as required. Rehabilitation remediation works may include;

- Application of additional water to newly planted vegetation
- Remedy of poor drainage areas where runoff is insufficient or to prevent erosion
- Aeration or fertilisation of topsoil to enhance vegetation growth
- Replanting of any dead vegetation
- Applying additional backfill material or topsoil
- Fencing to keep farming practises and livestock away from rehabilitated areas until established

# 6 Updating the Plan

Consistent with the Guidelines, the Proponent accepts the requirement to update the Decommissioning and Rehabilitation Plan every 5 years. The Proponent will update this plan during the first year of commercial operations and every 5 years thereafter. In updating the plan during the first year of operations the Proponent will take into account as built wind farm infrastructure, any changed landowner ownership and any regulatory or approval conditions relevant to the future decommissioning process. A copy of the updated plan will be made available for public viewing.



Attachment 1 – Refurbished Wind Turbine for Sale

List of curr	ently available			
				Repowering Solutions
's Offer's No. reference no.	Titl	e / Technical Data	Price, Scope of Deliver commercial and delive	
If yo	ou want to have more details o	r a detailed offer and photos,		[RE]MANUFACTURED WTG USED WTG UNUSED WTG
2013/0001	LAGERWAY 18/80KW Manufaturer: Power: Year of production: Urit: Rotor: Rotor: Tower height: General condition: Notes:	Legerway 80kW 2000 Several units 18 30 Remanufactured We can supply this turbine Limited at 60kW for Italian Market	Price: Scope of deliveries: Status: Location: Delivery:	a) Nacelle b) Rotor c) Tower d) New full power converter e) New generator Remanufactured with 2 year warranty Spain Has to be negotiated
			Payment: Available:	Has to be regotiated Immediately
2013/0002	NORDTANK Manufacturer: Power: Year of production: Unit: Rotor: Tower height:	NORDTANK 300 300KW 1996 30 28 30	Price: Scope of deliveries:	a) Nacelle b) Rator c) Tower d) New full power converter
	General condition:	Remanufactured We can supply this turbine Limited at 200kW for Italian or 250kW for North Ireland markets	Status: Location: Delivery: Payment: Available:	<ul> <li>e) New generator</li> <li>f) New generator</li> <li>Remanufactured with 2 year warranty</li> <li>Spain</li> <li>Has to be negotiated</li> <li>Has to be negotiated</li> <li>Immediately</li> </ul>
2013/0003	VESTAS			
	Minufacturer: Power: Year of production: Unit: Rotor: Tower height: General condition:	VESTAS V22 225KW 1999 3 27 30 Remanufactured	Price: Scope of deliveries:	a) Nacelle b) Rotor c) Tower
			Status: Location: Delivery: Payment: Aveilable:	Remanufactured with 2 year warranty Spain Has to be negotiated Has to be negotiated Immediately
2013/0004	NORDEX N54 Manufacturer: Power: Year of production: Unit: Rctor: Tower height: General condition:	NORDEX 1000 2000 17 54 60 Good condition	Price: Scope of delivaties:	a) Nacelle b) Rotor c) Tower d) Control cabinet e) Trafo
			Dismantling: Status: Location: Delivery: Payment: Available:	Not including Used Germany Has to be negotiated Has to be negotiated Immediately
2013/0005	NEG MICON Manufacturer: Power: Year of production: Unit: Rotor: Tower height:	NEG MICON 1000 2000 12 60 70	Price: Scope of deliveries:	a) Nacelle b) Rotor c) Tower d) Control cabinet

Available second hand wind energy converters due to repowering programns FEBRERO 2013

REPOWERING SOLUTIONS

Available second hand wind energy converters due to repowering programns

15/03/2013

VIND TURBINE February 2013 Title NORDEX NSO Manufacturer: Power: Year of production: Unit: Rotor: Tower height: General condition: VESTAS V66 Manufacturer: Power: Year of production: Unit: Rotor: Tower height: General condition:	e / Technical Data	Price, Scope of Deliveri commercial and deliver Dismantling: Setus: Location: Delivery: Payment: Available: Price: Scope of deliveries: Status: Location: Delivery: Payment: Available:	ring conditions Not including Used Germany Has to be negotiated Has to be negotiated immediately 160.000,0 a) Nacelle b) Botor c) Tower d) Control cabinet e) Trafo Not including Germany Has to be negotiated Has to be negotiated Has to be negotiated b) Rotor c) Tower d) Control cabinet b) Rotor c) Tower d) Control cabinet
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Manufacturer: Power: Year of production: Unit:	VESTAS V90 - CLASS I 3000 2010 6	Price: Scope of deliveries:	please give us your price a) Nacelle b) Rotor c) Tower
	Power: Year of production: Unit: Rotor: Tower height: General condition: General condition: VESTAS Manufacturer: Power: Year of production:	Manufacturer:     VESTAS VS2 - CLASS I       Power:     850       Year of production:     2010       Unit:     4       Rctor:     52       Tower height:     65       Unused - The turbines have not been installed, we think we can buy these turbines at a significant discount.       VESTAS       Manufacturer:     VESTAS V90 - CLASS I       Year of production:     2010       Unit:     6       Retor:     90	VESTAS         Price:           Manufacturer:         950         Scope of           Year of production:         2010         deliveries:           Unit:         4         deliveries:           Towar height:         65         deliveries:           Unused - The turbines have not been installed, we think we can buy these turbines at a significant discount.         Dismantling Status; Location: Delivery: Available:           Vestas         Vestas         Price:           Manufacturer:         YESTAS V90 - CLASS I         Price:           Manufacturer:         YESTAS V90 - CLASS I         Price:           Power:         3000         Scope of deliveries:           Ver of production:         2010         deliveries:           Unit:         6         Retor:         Sign

Available second hand wind energy converters due to repowering programns FEBRERO 2013

REPOWERING SOLUTIONS

#### Available second hand wind energy converters due to repowering programns

15/03/2013

List of curren Second hand Issued/up-dated:	WIND TURBINE February 2013			Repowering Solutions
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	General condition:	been installed, we think we can buy these turbines at a significant discount.	Dismantling Status: Location: Delivery: Payment: Available:	Including Unused Spain Has to be negotiated Has to be negotiated Immediately



From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 25 January 2024 9:00:27 AM
Attachments:	ian-mcdonaldsubmission-draft-wind-energy-guidelines.docx

Submitted on Thu, 25/01/2024 - 08:56

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

# Name

**First name** Ian

Last name McDonald

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Walcha 2354

**Please provide your view on the project** I object to it

Submission file ian-mcdonald---submission-draft-wind-energy-guidelines.docx (670.94 KB)

Submission Per Ian McDonald - Submission Draft Wind Energy Guideline. docx (670.94 KB)attachment

I agree to the above statement Yes

# **DRAFT ENERGY POLICY FRAMEWORK**

NSW DPE, November 2023

Submission by: Ian McDonald Walcha Grazier

> 'Banchory' Lakes Road, Walcha NSW

25<sup>rd</sup> January 2024

# **Draft Energy Policy Framework**

The document ignores the real impacts of the massive and unjustifiable footprint of wind and solar farms, and associated transmission lines on the natural environment and rural landscape, which footprint and the *'rewiring the nation'* could be entirely dispensed with if clean zero emissions nuclear generated baseload electricity was adopted in lieu of unreliable, unaffordable, and environmentally unfriendly renewables.

It takes a long time to build community trust, but within days of releasing these new guidelines that have taken years to prepare, EnergyCo changed the legend of a map. This change caused large tracts of farmland from originally being classified as "less suitable" to now being "suitable" for wind generators. This has unfortunately caused a degree of mistrust within the rural community towards EnergyCo.

I comment on the Draft Energy Policy Framework as follows:

# **Draft Wind Energy Guidelines**

### Clause 2.6 – Critical State Significant Infrastructure (CSSI)

Due process and enshrined procedures, including judicial, should not be overridden by Ministerial discretion if a project is classified CSSI. The wording of this clause would suggest that the government of the day could compulsorily acquire any farmland for wind and solar generation, per section 5.13 of the EP&A Act.

### Section 4. Site Selection Project Design

The setback from all National Park boundaries should be a minimum of 10km to preserve adjacent woodlands. These woodlands serve as connectivity corridors for wildlife to freely commute in and out of National Parks and provide refuge in time of bushfires. The woodlands are just as important, if not more important, than the Parks themselves in serving as sanctuaries and breeding habitat for wildlife.

### Section 5.1 Landscape and Visual Impacts

My property "Banchory" is typical of grazing properties on the Great Dividing Range and Western Slopes, having vistas extending 20 km and more of an undulating rural landscape, and taking in numerous ridgelines. The closest ridgeline to my house is about 4 km away, and each fully grown(30m) tree is clearly visible. I often stare at this ridgeline and imagine 250 metre high (being 8 times higher than the trees) turbines in place of the trees, and each time I concluded that it would be so confronting as to be inconceivable to have 6MW turbines at 4km.

Consideration needs to be given to topography when determining set back distances and since most turbines on the Range and Slopes are positioned on ridgelines, I would suggest the minimum setback from dwellings be as follows: 5km set back up to a 5MW turbine, 6km set back up to a 6MW turbine, and 7km set back up to 7MW turbine.

Furthermore, all transmission over 300KV should be underground and should be DC and subject to agreed procedures set by the Independent Energy Ombudsman.

## 5.2 Noise and Health

The draft suggestion of 50dB(A) for National Parks is a nonsense. It should be a consistent measure everywhere and should not exceed 35bB(A) or the background noise by more than 5dB(A).

Background noise must be measured in winter and include evening readings when it is still and quiet and when the nocturnal noise levels might frequently fall below 15dB(A). Readings can often be distorted by storm activity or high winds in the summer period.

Please find attached my paper on infrasound which was last revised in August 2023. The paper refers to the findings of the Federal Administrative Appeals Tribunal (AAT) December 2017, which findings are more recent than those for the NHMRC 2015 that the draft guidelines are based on. The AAT findings 2017 should supersede the NHMRC findings as the DPE yardstick. European research confirms that adverse health effects began with re-powering (replacing smaller turbines with bigger ones), therefore older research is not a fair reflection of current turbine effects. The following suggestions are made for the DPE to consider when evaluating wind farm applications.

- Blade pass harmonics should be measured in isolation, as it is this that is the infrasound signature. The peak signal should not be filtered out by averaging sound.
- LFN Noise (LFN) infrasound measurement using dB(A) is an inadequate measure of relevant wind farm noise, and wind farm noise measurement should not be averaged out over time or frequencies.
- Wind farm LFN/infrasound can be greater indoors than outdoors at a dwelling by as much as 25dB, and this is why complaints are more often about indoor disturbance when people are trying to sleep.
- There is a well-established pathway from wind farm *annoyance* to adverse health outcomes emanating from LFN/infrasound, therefore increased resonance inside dwellings should be considered when measuring sound. The DPE in its draft guidelines states that wind farms are unlikely to generate LFN repeatedly in excess of 60dB(C), but this measurement does not take into account the measurement of blade pass harmonics or measurements inside a dwelling.

Should both these measurements be considered, then readings in excess of 80dB, could very well be registered. That measurement would be in excess of the recommendations of the Mainz University Medical Centre, Germany, as a maximally tolerated limit for chronic exposure (please refer to my attached paper).

If the above criteria were considered when assessing LFN/infrasound, then the DPE could no longer possibly state, that there is no deleterious evidence between wind turbines and health issues.

Home grown research into LFN/infrasound is presently afoot by a joint Flinders/ NSW University team. Whilst we await the outcome of that research, I request that the sentence *"It is not currently necessary for developers of wind energy projects to conduct a health impact assessment in relation to wind energy development and infrasound*", be removed from the guideline.

## 5.4 Bird and Bat Impact

It is pleasing to see that the DPE has finally recognized that mortality rates are difficult (I would say near impossible) to measure as carcasses are removed by scavengers before they can be counted. Your mortality estimates, however, are still grossly understated and out of step with those of world-renowned ecologists.

I concede that a lot of bird deaths can be attributed to collisions with buildings, vehicles and powerlines, and predation by cats. But raptors don't fly into buildings, or vehicles. They are however, killed by wind turbine blades and powerlines. Proper surveys carried out by independent world-renowned ecologists in Southern California (*Wiegand 2012*) and Tasmania (*Debus 2022*) have confirmed a decline in the Golden Eagle and Brown Falcon populations, respectively, of approximately 80% since wind farms began operations. No amount of '*biodiversity offset credits*' will ever bring these poor creatures back to life or replace their breeding habitat with '*like for like*'.

It appears that the draft guideline accepts a mortality rate of 3 birds per turbine per annum. At this rate of attrition, eagles and other raptors could become extinct or reach near extinction during the life of a nearby wind farm. This has been proved by the surveys I have quoted above. Slow reproducing raptors are at the top of the food chain and are particularly vulnerable to being killed by wind turbine blades.

### 5.7 Decommissioning and Rehabilitation

A decommissioning security bond covering the full cost of rehabilitation should be provided by the applicant before any wind farm construction begins, as is the standard practice in the mining industry.

### 5.8 Waste Management and Circular Design

Presently the DPE has NO PLAN for the waste arising from turbine blades. And whilst these blades continue to be stockpiled in staggering quantities and leaching high levels of BPA, arbitrary discussions continue between government authorities as to what to do with them. Until such time as this conundrum has been resolved and an environmentally acceptable plan is legislated, I call on government to adopt the "precautionary principle" and initiate a moratorium on all wind farm applications.

### Conclusion

The existing grid has served our Nation well for generations and is one that can amply cope with projected increased loads well into the future if we continue to generate baseload power. Please, lets respect an unspoiled landscape and our quintessential Australian way of life and keep on generating baseload electricity.

Ian McDonald Walcha Grazier

Attachment: "What You Can't Hear Won't Hurt You – Or Will It" Paper on Infrasound, Ian McDonald, August 2023, 3 pages.

#### WHAT YOU CAN'T HEAR WON'T HURT YOU - OR WILL IT

Wind turbines not only generate electricity but also noise annoyance and 'silent' infrasound.

Infrasound (inaudible sound 0-20Hz) is a common phenomenon and occurs where large masses are in motion. This happens in nature with wind, storms, earthquakes, and ocean waves for instance and many animals including elephants and whales also use infrasound as a means to communicate on their own private channels over vast distances. Whales communicate with one another across entire oceans.

Modern society has greatly increased its generation through technology and industry, including industrial wind farms. Opening the window of a car traveling at 100km/hr for example exposes the passengers to acute levels of infrasound as high as 125 decibels (dBz). This increase in exposure to infrasound is historically unanticipated and has led to a growing concern among the public regarding its safety. This concern has been compounded by a wide spectrum of complaints, which have been reported worldwide among populations exposed to infrasound, especially between individuals who are exposed to chronically high levels due to occupational conditions or by residing near industrial sources such as natural gas compressor stations, sewage pumping stations, industrial air conditioners and other power plants, like wind farms.

Thousands of people from around the world have lived near wind farms for twenty years or more. They have found the noise annoying and quite loud at times, but it hasn't until recently made them feel ill or caused prolonged sleep deprivation. It has taken some time to realise the problems are a result of re-powering. That's when small wind turbines are replaced with bigger, more efficient models and now those same people are complaining to government and wind farm proponents. The standard response from government bodies such as the German Environment Agency is that the infrasound is drowned out by the background noise (below 75 dBa). In other words a perfectly normal noise level arises from which it is no longer possible to filter out the unique features of infrasound over a distance of 700 metres or so.

Infrasound is also measured in the Free State of Bavaria, however in order to identify possible explosions from nuclear weapons. Here the Federal Institute for Geosciences and Natural Resources, the BGR, operates a measuring station on behalf of the German Government. Because wind farms could affect the measurements, back in 2004 the BGR team led by Dr Lars Ceranna examined infrasound emissions from a small single turbine. They found that every time the blade passed the tower it produced an infrasound signature, which is referred to as blade pass harmonics, that emerge from the background noise with a distinctly higher acoustic pressure or energy, if you like. For bigger wind turbines, the scientist's made a model calculation based on a 5MW turbine. They found that an infrasound signal would be generated over a distance of 20 klm. Far in excess of the background noise projection of 700 meters nominated by The German Environment Agency.

So how can this huge difference be explained? It is customary in acoustics to focus on bands. In other words a group of frequencies, whereby the peaks are evened out and not on individual frequencies. So, an averaged reading is normally recorded, and this protocol is what government and wind farm proponents have been relying on until recently. This would appear to be a deliberate ploy to ignore the infrasound peaks created by blade pass harmonics.

This is significant. Unembellished data is now being called upon by the regulatory authorities. Here in Australia exhibition of the Jupiter wind farm Environmental Impact Statement (EIS) was initially

rejected by the NSW Department of Planning & Environment (DPE) on advice from the Federal Administrative Appeals Tribunal (AAT). The AAT in December 2017 directed that: There is a well established pathway from *annoyance* to adverse health outcomes; A significant proportion of wind farm noise is in the low frequency range; humans are more sensitive to low frequency sound and it can therefore cause greater *annoyance* than higher frequency sound; Even if it is not audible, low frequency noise and infrasound may have other effects on the human body which are not mediated by hearing but also not fully understood; Noise measurement using dBa is an inadequate measure of relevant wind farm noise and wind farm noise can be greater indoors than outdoors at a dwelling. Thus, an acoustical graph flattened to such a degree can no longer provide wind farm proponents or government with the argument that infrasound and low frequency noise (ILFN) from wind farms is swallowed up by background noise.

Infrasound has a very long wavelength compared to audible sound, which enables infrasound by means of reflection, refraction and diffraction to pass through and around different obstacles such as buildings and terrain. The long wave-length also allows infrasound to maintain energy, remaining relatively stable after travelling very long distances. For this reason, common noise barriers are usually ineffective against it.

It is also common for infrasound to generate high energetic standing waves inside rooms of houses. This kind of resonance sometimes leads to an increase of levels of up to 25 dBz higher than the measured level outside the house and why complaints are more often about indoor disturbance instead of outdoor. For example, while some outdoor measurements may read 80 dBz at the same time in a nearby bedroom over 100 dBz can be present. This could explain why the resident neighbours of the Bald Hills windfarm, who 'had disturbed sleep hundreds of times after the wind farm began operation' would seek relief by sleeping in their cars at the local beach. Fortunately for them the Victorian Supreme Court this year awarded in their favour, albeit after they had abandoned their homes. This is not uncommon, as many people living near wind farms get sick. So sick that they abandon (as in, shut the door and leave) their homes. Nobody wants to buy their acoustically toxic homes. The lucky ones get quietly bought out by the wind developers, who steadfastly refuse to acknowledge that Wind Turbine Syndrome exists (and yet the wind developers thoughtfully include a confidentiality clause in the sales agreement, forbidding their victims from discussing the matter further).

"What you can't hear, won't hurt you". There is no scientific evidence to support this statement, but there is a colossal amount of scientific evidence indicating otherwise.

Infrasound has also been linked to how the brain deals with stress management. A team led by Professor Simone Kuhn of the Max Planck Institute has speculated that we are not able to defend ourselves against high levels of infrasound because what we consciously hear can be assessed and if necessary, ignored. But things that are only perceived subconsciously generate stress and perhaps even fear.

At present, infrasound (0-20Hz) and low frequency noise (20-500 Hz) are agents of a disease that goes unchecked. Vibroacoustic disease (VAD) is a whole body pathology that develops in individuals excessively exposed to ILFN. Since VAD is caused by ILFN and explained through mechanotransduction pathways, it is not surprising why it is taking so long to understand its existence.

There is also plenty of evidence regarding the damaging effect of infrasound on the heart. Another German research team led by Professor Christian-Fredrich Vahl at Mainz University Medical Centre conducted experiments on the exposure of heart tissue to infrasound. Every test revealed that infrasound did have a distinct effect on heart muscle tissue and a clear reduction in heart muscle strength. Professor Vahl went on to add that "whether we hear it or not, every form of

energy has physical effects and infrasound is particularly dangerous, because we don't hear it. They concluded their research with the following footnote: As medical researchers, it is strongly recommended that infrasound levels generated by wind farms do not approach pathological levels. It is the recommendation of this research group to set the level of infrasound no higher than 80 dBz (20 dBz below the critical value of 100 dBz) as the maximally tolerated limit for chronic exposure.

As Naturopath Phillip Alexander so eloquently put it in his letter to the editor of the Apsley Advocate, 14 September 2022 – The stronger the heart the more blood it can pump uphill against gravity, to the brain. The more the brain is suffused with blood, oxygen and nutrients the stronger, more functional and resistant to stress it is. That makes perfect sense to a layman, like me!

Insomnia, heart problems, perception disorders, VAD, stress, fear, mood swings, depression, burn out, nosebleed and fright-flight response. These are some of the disease symptoms that can be caused by infrasound. Doctors believe 10 and 30% of people react to it and that more people are affected by it the longer they are exposed to it. And that means it could impact on thousands of people in Rural Australia alone, not to mention the tens of thousands of farm animals and native fauna. A correlation of stress in humans and livestock would seem to be a reasonable hypothesis, and particularly when it comes to potential production losses due to unappealing tough eating, dark cutting meat – 'a dark cutter'. Nevertheless, the mass experiment with wind power on a scale that beggar's belief, continues to carpet valuable productive agricultural land.

The 6MW plus wind turbines that are proposed for the New England REZ are new generation and no one really knows exactly what amplitude of infrasound they will be emitting. Data is only available on much smaller turbines in the 2-3MW range that transmit averaged (a flattened graph ignoring blade pass harmonics/peaks with decibels expressed as dBa) outdoor readings of 50-60 dBa. But modelling, probability and common sense would suggest that a **6MW plus turbine will exceed the critical threshold amplitude of 80 dBz chronic exposure of infrasound over 20kIms**, which could present as a health problem to any human or animal living in a 20 klm radius of a 6MW plus wind turbine. My understanding is that would encompass most localities, villages, townships including the cities of Armidale and Tamworth across the REZ.

With knowledge comes responsibility and the time has come to take a more active position against this futile violation of Rural Australia.

There are sensible base-load energy alternatives to this potential travesty that will deliver dispatchable power 24/7 without any risk to our security. Energy security is National security.

#### lan McDonald, Walcha Grazier.

From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Thursday, 25 January 2024 9:08:47 AM
Attachments:	submission-to-dperoger-and-geralyn-flower.pdf

Submitted on Thu, 25/01/2024 - 09:05

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

# Name

First name Roger

Last name Flower

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** 2365

**Please provide your view on the project** I object to it

Submission file submission-to-dpe---roger-and-geralyn-flower.pdf (1.39 MB)

**Submission** Please see submission letter attached

I agree to the above statement Yes



#### 1. Introduction

Dear Minister Scully,

In November 2023 we attended the Department of Planning "Have your say" meeting at Rydges Hotel, Marsh Street, Armidale regarding their draft plan for wind and solar guidelines.

I am writing to express our deep concerns regarding the proposed Boorolong Windfarm by Squadron Energy. Our property, "Myola," spanning 2000 acres of prime grazing country at 278 Toms Gully Road, Black Mountain, is not only our livelihood but also our home. The proposed windfarm is alarming as it is planned to be within 1500m of our boundary and less than 300m from the Boorolong Nature Reserve. We firmly believe that the costs associated with this project, both for the local residents and the environment, far outweigh any potential benefits. The Renewable Energy Zone (REZ) being 2.5 times the capacity of the next largest REZ in the state raises significant concerns, transforming some of the best grazing country in NSW into what could become an industrial wasteland.

Our submission will outline key areas of concern, and we earnestly hope you will take these into consideration before granting approval.

#### 2. Visual Impact

In 2002, we constructed our family home at Myola, selecting the site specifically for its breathtaking views. The proposed turbines, reaching a height of 300m—nearly matching the height of the Centrepoint Tower in Sydney—will be prominently visible from great distances. A visual representation in Appendix 1.1, provided by Squadron Energy, vividly illustrates the profound impact this windfarm will have on the scenic views from the front of our house.

Adding to our concerns, we've been informed that each turbine will feature a red flashing light, ensuring a 24-hour visual impact. This will affect over 80% of our property, not only altering the view from our house but also disrupting the environment where we work daily.

Situated to the west of our property, the proposed turbines could create a disturbing strobelike effect as the blades turn in front of the setting sun. This has the potential to be not only visually detrimental but emotionally disturbing as well.

Living in the countryside for the peace, quiet, and expansive views, the towering turbines at a height of 300m threaten our overall quality of life and working environment. The question arises whether the proposed site, given the considerable height of the towers, is suitable for a windfarm. The significant visual impact of these structures underscores the importance of carefully choosing windfarm locations to prevent the loss of visual amenity. For instance, Denmark, a pioneer in windfarm technology, is increasingly opting for offshore placements to mitigate onshore visual impact.

Anticipating a tangible impact on our property's overall value due to the visual intrusion caused by the windfarm, we seek clarification on liability in the event the proposed project gains approval.



In summary, the Squadron Energy windfarm project raises significant concerns about visual impact, quality of life, and potential property devaluation. We urge a thorough consideration of these issues during the evaluation process to ensure the preservation of our chosen living environment.

Additionally, we would appreciate further information on the measures Squadron Energy plans to implement to address visual impact and whether any alternative sites were considered to mitigate these concerns.

#### 3. Noise

We have grave concerns about the validity of the noise assessment conducted in house by Squadron Energy. We feel that an independent assessment should have been conducted to ensure that there is no confirmation bias in their findings.

The concerns surrounding wind tower noise are multifaceted and encompass potential impacts on both physical and mental well-being. The following are some of the potential symptoms associated with prolonged exposure to wind farm noise:

- Migraines and headaches
- Sleep disturbances
- Inner Ear and balance problems
- Anxiety and nausea
- Mental Health Problems
- Depression
- Increased Blood pressure

Academic research has extensively explored the effects of WTN on human health, particularly for individuals residing in close proximity to wind farms. The following studies provide valuable insights into this matter:

#### "Effects of Industrial Wind Turbine Noise on Sleep and Health"

Authors: Michael Nissenbaum, Jeff Aramini, Christopher Hanning

Published in: Noise & Health, 2012

**Key Findings:** 

The study investigates the impact of industrial wind turbine noise on both sleep quality and overall health.

Findings suggest that exposure to wind turbine noise is associated with disturbances in sleep patterns and adverse effects on health.

# "Wind Turbine Noise and Human Health: A Four-Decade History of Evidence that Wind Turbines Pose Risks"



Authors: Stephen E. Ambrose, Robert W. Rand

Published in: Environmental Research, 2013

Key Findings:

This study provides a historical overview of evidence spanning four decades, highlighting risks associated with wind turbine noise.

Findings suggest a correlation between exposure to wind turbine noise and various health concerns, contributing to the ongoing discussion on the potential risks.

#### "Health Effects Related to Wind Turbine Noise Exposure: A Systematic Review"

Authors: Mariëlle A. E. C. Krogh, Carmen M. E. Krogh

Published in: PLOS ONE, 2011

Key Findings:

This systematic review examines a range of health effects linked to exposure to wind turbine noise.

The findings indicate that individuals exposed to wind turbine noise may experience a variety of health-related issues, including sleep disturbances and heightened annoyance.

#### "Wind Turbines, Noise and Health"

Author: Geoff Leventhall

Published in: Noise and Health, 2013

**Key Findings:** 

The study by Geoff Leventhall contributes to the discourse on wind turbines, noise, and health.

Findings explore the potential impact of wind turbine noise on individuals and the importance of carefully considering the siting of wind farms to prevent the loss of visual amenity.

These studies collectively highlight the impacts of wind tower noise, encompassing disturbances to sleep patterns, potential risks to human health, and the overall well-being of individuals residing near wind farms. The concern is further exacerbated by the proposed turbines' height of 300m, raising questions about the suitability of the chosen site for a windfarm.

Furthermore, what impact will the noise have not only on the native fauna (some of which are endangered species) in the Boorolong nature reserve but also the impact on the wellbeing of our livestock? Even if the squadron energy noise impact zone is correct, there has been zero consideration in regards to the impact this will have on the local wildlife. If



you refer to appendix 1.2 you will see that the noise impact zone proposed by squadron energy encroaches on the Boorolong nature reserve by 50%.

Given the potential health implications not only to surrounding residents but also to local fauna, we urge a thorough consideration of these findings in the evaluation of the Boorolong Windfarm project.

#### 4. Community Engagement

There have been significant shortcomings in the community engagement and consultation processes conducted by Squadron Energy. Our concerns arise from the fact that we were never approached or informed about the proposed project by Squadron. Furthermore, residents in the area who have agreed to host wind towers on their property have been subjected to a gag clause, preventing them from sharing information with impacted locals. This lack of transparency has left many residents in the dark about the potential impact on our community.

When the government engaged with the local community regarding the Renewable Energy Zone (REZ), our concerns were not adequately addressed, and there was a notable absence of documentation during the consultation meetings. The absence of detailed notes and consideration of our concerns left many feeling that the consultation was merely a "box-ticking" exercise, designed for the planning body to fulfill a requirement rather than genuinely engaging with the community about the project. These inadequacies in the engagement process underscore the need for more transparent and inclusive communication in future developments.

#### 5. Boorolong Nature Reserve

We originally held the grazing rights to Boorolong Nature Reserve from 1996 – 1999, prior to it being instated as a National Park. The area was of high ecological importance as it was the habitat to may endangered species (please refer to appendix 1.3) and as such was declared a national park. It seems counterintuitive that we lost grazing rights due to potential environmental impact, yet the government are willing to approve a project that has a very high risk of effecting native fauna right on its doorstep.

Bats are affected by the vibration and frequency of the turbines, the Boorolong nature reserve is the habitat of the vulnerable "little pied bat" and the "Large bent-winged bat". Furthermore, there are an array of vulnerable bird species that are outlined by appendix 1.3 that will be detrimentally impacted by the wind turbines. In terms of endangered species the nature reserve is the habitat to Koalas and the Southern Greater Glider. If the government is spending up to \$190 million on programs to save Koala habitat it seems counterproductive to set up a wind farm within 300m of a well-known koala habitat.

#### 6. Biosecurity



There are potential biosecurity risks associated with the importation of components from China. The importation of materials and equipment, particularly from regions with distinct ecosystems, introduces a heightened risk of introducing invasive flora and fauna to the local environment.

The inadvertent transportation of seeds, insects, or other organisms within the imported components can lead to the establishment of invasive species in the Boorolong region. These invasive species may outcompete native flora and fauna, disrupt local ecosystems, and potentially cause irreparable damage to the delicate balance of the natural environment.

#### 7. Construction

There are many impacts from the construction of the wind farm that are of great concern to local residents. It has been proposed that Toms Gully Road will be used to bring the infrastructure and materials needed for the development. This is a tiny partially sealed road that runs for 18km between the New England Highway and Boorolong Road. Not one property owner on that road has agreed to take wind turbines, yet will pay the price in inconvenience as hundreds of truck movements each day will interrupt the day to day running of our farm, increase noise pollution and damage to the road. Furthermore, this is a single laned road which will increase the chances of a catastrophic accident with increased truck traffic.

#### 8. Accidents

The potential for accidents associated with the construction and operation of wind turbines is a critical concern that needs careful consideration. One specific aspect of this concern is the increased risk of bushfires in the vicinity of wind turbines, and the accessibility of aerial firefighting in case of emergencies.

The proposed Boorolong Windfarm is situated in close proximity to the Boorolong Nature Reserve and other rural properties, raising alarms about the heightened risk of bushfires. Wind turbines, with their mechanical components and height, can pose a fire hazard in dry and windy conditions. Lubricants, hydraulic fluids, and other flammable materials used in the turbines can contribute to the severity of a fire. There have been several accidents associated with the operation of windfarms. A list of these, over 900, is available on www.caithnesswindfarms.co.uk

Moreover, the construction phase itself involves heavy machinery, electrical components, and human activity, all of which can increase the likelihood of accidental fires. Considering the dry and often windy climate of the region, the potential for rapid and uncontrollable fire spread is a significant concern.

In the event of a bushfire, the accessibility for aerial firefighting becomes crucial for timely and effective response. The proposed location of the wind farm, particularly the height of the turbines, may pose challenges for traditional aerial firefighting methods. Recently, a fire started in one of the properties earmarked to take the turbines and due to the topography of the land it was unable to be fought on foot. The local RFS engaged the fire using aerial methods, the helicopter company who fought the fires made a point of stating that if the turbines were in place they would not have been able to safely access the area to fight said fire.



The towering turbines may restrict the flight path of firefighting aircraft, making it difficult for them to reach and effectively combat fires in the wind farm area. This limitation could lead to delays in response times, allowing fires to escalate and spread rapidly.

Given the environmental sensitivity of the Boorolong Nature Reserve and the potential impact on neighbouring properties, it is imperative to assess the adequacy of firefighting measures, both ground-based and aerial, to mitigate the risk of bushfires and ensure the safety of the community.

#### 9. Community Impact

The proposed Boorolong Windfarm has unfortunately resulted in a divisive atmosphere within the local community, turning neighbours against each other and creating a series of challenges that extend beyond the scope of the wind farm itself.

The introduction of the wind farm project has led to a stark divide among local residents. Disagreements over the project's merits and potential impacts have strained once-amicable relationships between neighbours, pitting those in favour of the wind farm against those opposed. This division has manifested in heated debates, community meetings marked by tension, and a general erosion of the sense of unity that once defined our community.

The influx of outside staff associated with the wind farm's construction and operation has placed considerable strain on local resources and services. The demand for housing, in particular, has surged, resulting in increased competition for available rental properties. This has led to rising rental prices, making it more difficult for existing residents and local workers to secure affordable housing.

Additionally, the sudden surge in population due to the temporary influx of construction workers has put pressure on essential services such as medical facilities, daycare centres, and local amenities. Residents are now facing longer waiting times for doctor appointments, challenges in securing daycare spots for their children, and increased congestion in local businesses.

While the wind farm project promises increased employment opportunities during its construction phase, it is crucial to recognize the transient nature of these benefits. Once construction is completed, the demand for local employment may decrease significantly, leaving a potentially adverse impact on the long-term economic stability of the community.

Moreover, the introduction of a temporary workforce from outside the community raises questions about the sustainability of these benefits. Will local workers have the necessary skills to operate and maintain the wind farm once it is operational? The potential reliance on external expertise may limit the direct and lasting economic advantages for the local workforce.

#### **10.** Conclusion

In conclusion, our submission highlights the concerns surrounding the proposed Boorolong Windfarm by Squadron Energy. We, express our deep reservations regarding the potential



impacts on our property, the local environment, and the broader community. As stewards of this land, we implore you, Minister Scully, to carefully consider the following key points before granting approval for the project.

The issues raised in our submission span critical areas such as noise pollution, visual impact, community engagement, and the potential threats to the Boorolong Nature Reserve. We have drawn attention to the well-documented health implications associated with wind turbine noise, the significant visual disruption caused by the towering turbines, and the inadequate community engagement processes conducted by Squadron Energy.

Additionally, concerns about the impact on local fauna, the heightened risk of bushfires, and the strains placed on local resources by the influx of outside staff underscore the complexity of the project's ramifications. The potential divisive effects on the community and the temporary nature of employment benefits raise questions about the sustainability and long-term well-being of our community.

We believe that a comprehensive, unbiased evaluation considering these concerns is imperative before reaching a decision on Squadron Energy's Boorolong Windfarm. The preservation of our home, the safeguarding of the environment, and the overall harmony of our community should be paramount in your considerations. We urge you to prioritize the well-being of the residents, the local ecosystem, and the future of our community over short-term economic gains.

Thank you for your attention to these crucial matters. We look forward to your thorough assessment.

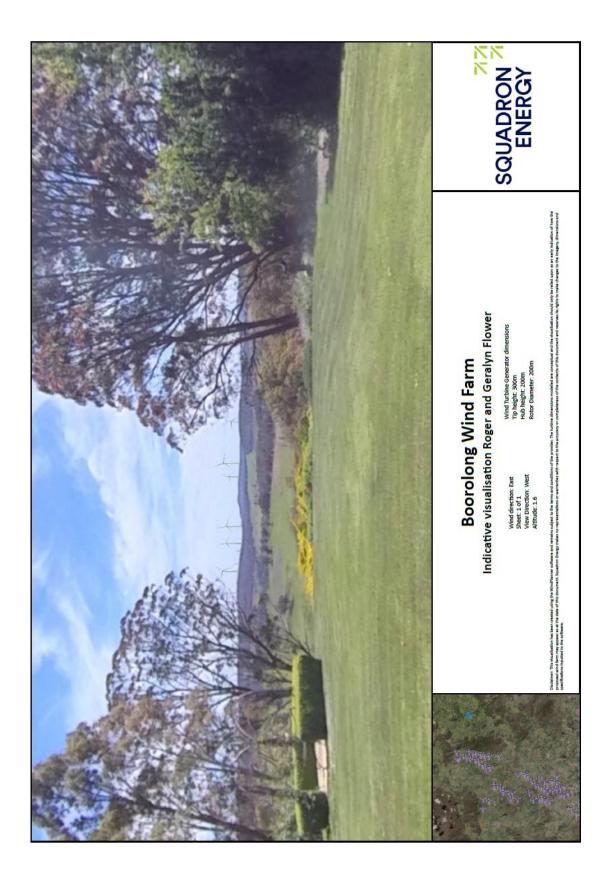
Sincerely,

Roger and Geralyn Flower

"Myola" 278, 278A Toms Gully Road, Black Mountain, NSW, 2365

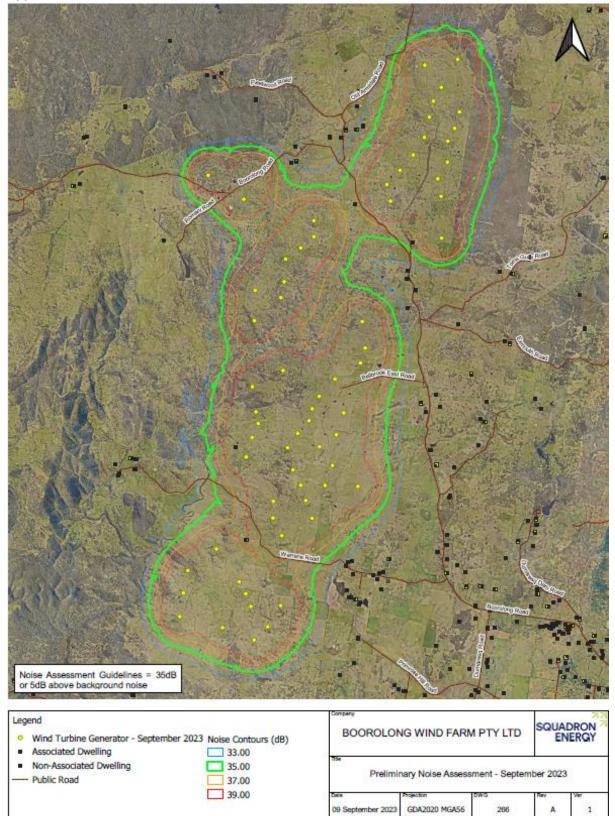


Appendix 1.1





Appendix 1.2



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#### Appendix 1.3

Data from the BioNet Atlas website, which holds records from a number of custodians. The data are only indicative and cannot be considered a comprehensive inventory, and may contain errors and omissions. Species listed under the Sensitive Species Data Policy may have their locations denatured (^ rounded to 0.1°C; ^^ rounded to 0.01°C. Copyright the State of NSW through the Department of Planning, Industry and Environment. Search criteria : Internal Report of all Valid Records of Entities in Booroolong NR NPWS Reserve returned a total of 6,203 records of 386 species. Report generated on 10/01/2024 10:19 AM

Kingdom	Class	Family	Species Code	Scientific Name	Exotic	Common Name	NSW status	Comm. status	Records	Info
Animalia	Amphibia	Myobatrachidae	3134	Crinia signifera		Common Eastern Froglet	P		1	
Animalia	Amphibia	Limnodynastidae	3063	Limn odynastes tasma niensi s		Spotted Grass Frog	Р		1	
Animalia	Amphibia	Hylidae	3183	Litoria fallax		Eastern Dwarf Tree Frog	P		3	
Animalia	Amphibia	Hylidae	3215	Litoria verreauxii		Verreaux's Frog	P		2	
Animalia	Reptilia	Scincidae	2408	Egernia cunningha mi		Cunningham's Skink	P		3	
Animalia	Reptilia	Scincidae	2429	Egemia striolata		Tree Skink	P		1	
Animalia	Reptilia	Scincidae	2557	Eulamprus quoyii		Eastern Water-skink	P		2	
Animalia	Reptilia	Scincidae	2441	Hemlergis decresiensis		Three-toed Earless Skink	Р		2	
Animalia	Reptilia	Scincidae	2450	Lamp ropholis delicata		Dark-flecked Garden Sunskink	Р		2	
Animalia	Reptilia	Scincidae	2451	Lampropholis guichen oti		Pale-flecked Garden Sunskink	Р		4	
Animalia	Reptilia	Scincidae	2542	Saiphos equalis		Three-toed Skink	Р		2	
Animalia				and the second			P		2	
	Reptilia	Agamidae	2194	Amphibolurus muricatus		Jacky Lizard				
Animalia	Reptilia	Agamidae	2252	Intellagama lesueurii		Eastern Water Dragon	P		1	
Animalia	Reptilia	Agamidae	5075	intellagama lesueurii lesueurii		Eastern Water Dragon	P		1	
Animalia	Reptilia	Elapidae	5136	Cryptophis nigrescens		Eastern Small-eyed Snake	P		1	
Animalia	Reptilia	Elapidae	2692	Pseudechis guttatus		Spotted Black Snake	P		1	
Animalia	Reptilia	Elapidae	2693	Pseudechis porphyriacus		Red-bellied Black Snake	P		1	
Animalia	Aves	Anatidae	0217	Bizi ura lo bata		Musk Duck	P		1	
Animalia	Aves	Anatidae	0202	Cheno netta jubata		Australian Wood Duck	P		1	
Animalia	Aves	Podargidae	0313	Pod arg us strig oides		Tawny Frogmouth	P		1	
Animalia	Aves	Aegothelidae	0317	Aegotheles cristatus		Australian Owlet-nightjar	P		2	
Animalia	Aves	Phalacrocoracida	0100	Microcarbo melano leucos		Little Pied Cormorant	Ρ		1	
Animalia	Aves	Phalacrocoracida	0097	Phalacrocorax sulcirostris		Little Black Cormorant	Р		1	
Animalia	Aves	Ardeidae	0186	Ardea intermedia		Intermediate Egret	Р		1	
Animalia	Aves	Ardeidae	0189	Ardea pacifica		White-necked Heron	P		1	
Animalia	Aves	Accipitridae	0221	Accipiter fasciatus		Brown Goshawk	Р		1	
Animalia	Aves	Accipitridae	0224	Aquila audax		Wedge-tailed Eagle	P		1	
Animalia	Aves	Rallidae	0059	Fulica atra		Eurasian Coot	Р		1	
Animalia	Aves	Rallidae	0056	Gallinula tenebrosa		Dusky Moorhen	P		1	
Animalia	Aves	Rallidae	0058	Porphyrio porphyrio		Purple Swamphen	P		1	
Animalia	Aves	Turnicidae	0014	Turnix varius		Painted Button-guail	P		1	
Animalia	Aves	Cacatuidae	0269	Cacatua galerita		Sulphur-crested Cockatoo	P		1	
Animalia	Aves	Cacatuidae	0273	Eolophus roseicapilla		Galah	P		3	
Animalia	Aves	Cacatuidae	0267	Zanda funereus		Yellow-tailed Black-Cockatoo	P		1	
Animalia		Psittacidae	0281	Alisterus scapularis		Australian King-Parrot	P		3	
Animalia	Aves		0281			Crimson Rosella	P		14	
	Aves	Psittacidae		Platycercus elegans			P			
Animalia	Aves	Psittacidae	0288	Platycercus eximius		Eastern Rosella	P		4	
Animalia	Aves	Psittacidae	0295	Psephotus haematonotus		Red-rumped Parrot			1	
Animalia	Aves	Cuculidae	0338	Cacomant is fla belli for mis		Fan-tailed Cuckoo	P		1	
Animalia	Aves	Cuculidae	0343	Chalcites lucidus		Shining Bronze-Cuckoo	Р		2	
Animalia	Aves	Strigidae	9922	Ninox novaeseelan diae		Southern Boobook	P		1	
Animalia	Aves	Alcedinidae	0322	Dacelo novaeguinea e		Laughing Kookabu ma	P		2	
Animalia	Aves	Coraciidae	0318	Eurystomus orientalis		Dollarbird	P		1	
Animalia	Aves	Climacteridae	0560	Climacteris erythrops		Red-browed Treecreeper	Р		1	
Animalia	Aves	Climacteridae	0558	Cormobates leucophaea		White-throated Treecreeper	P		7	
Animalia	Aves	Maluridae	0529	Malurus cyaneus		Superb Fairy-wren	P		1	
Animalia	Aves	Acanthizidae	0486	Acanthiza chrysorrhoa		Yellow-rumped Thornbill	P		1	
Animalia	Aves	Acanthizidae	0470	Acanthiza lineata		Striated Thombill	P		2	
Animalia	Aves	Acanthizidae	0475	Acanthiza pusilla		Brown Thornbill	Ρ		3	
Animalia	Aves	Acanthizidae	0484	Acanthiza reguloides		Buff-rumped Thom bill	Р		2	
Animalia	Aves	Acanthizidae	0504	Chthonicola sagittata		Speckled Warbler	V,P		1	i
Animalia	Aves	Acanthizidae	0453	Gerygone olivacea		White-throated Gerygone	Р		3	
Animalia	Aves	Acanthizidae	0488	Sericornis frontalis		White-browed Scrubwren	P		2	
Animalia	Aves	Pardalotidae	0565	Pardalotus punctatus		Spotted Pardalote	P		4	
Animalia	Aves	Pardalotidae	0976	Pardalotus striatus		Striated Pardalote	P		5	
Animalia	Aves	Meliphagidae	0591	Acanthorhynchus		Eastern Spinebill	P		2	
				tenuirostris						
Animalia	Aves	Meliphagidae	0638	Antho chaera caru nculata		Red Wattlebird	P		4	
Animalia	Aves	Meliphagidae	0614	Caligavis chrysops		Yellow-faced Honeyeater	P		4	
Animalia	Aves	Meliphagidae	0634	Manorina melanocephala		Noisy Miner	P		2	
Animalia	Aves	Meliphagidae	0583	Melithreptus brevirostris		Brown-headed Honeyeater	Р		2	

Astesalla		Mallaharidaa	0570			White and the second star			
Animalia	Aves	Meliphagidae	0578	Melithreptus lunatus		White-naped Honeyeater	P		3
Animalia	Aves	Meliphagidae	0617	Nesop til oti s leuco tis		White-eared Honeyeater			4
Animalia	Aves	Meliphagidae	0645	Philemon corniculatus		Noisy Friarbird	P		2
Animalia	Aves	Meliphagidae	0613	Ptilotula fusca		Fuscous Honeyeater	P		1
Animalia	Aves	Neosittidae	0549	Daphoenositta chrysoptera		Varied Sittella	V,P		3
Animalia	Aves	Campephagidae	0424	Coracina nova ehollandiae		Black-faced Cuckoo-shrike	Ρ		4
Animalia	Aves	Campephagidae	0425	Coracina papuensis		White-bellied Cuckoo-shrike	Ρ		1
Animalia	Aves	Pachycephalidae	0408	Colluricincla harmonica		Grey Shrike-thrush	P		8
Animalia	Aves	Pachycephalidae	0398	Pachycephala pectoralis		Golden Whistler	P		2
Animalia	Aves	Pachycephalidae	0401	Pachycephala rufiventris		Rufous Whistler	P		2
Animalia	Aves	Oriolidae	0671	Oriolus sagittatus		Olive-backed Oriole	P		2
Animalia	Aves	Artamidae	8519	Artamus cyan opterus		Dusky Woodswallow	V,P		1
				cyanopterus					
Animalia	Aves	Artamidae	0702	Cracticus torquatus		GreyButcherbird	P		5
Animalia	Aves	Artamidae	0705	Gymnorhin a tibic en		Australian Magpie	P		71
Animalia	Aves	Artamidae	0694	Strepera graculina		Pied Currawong	P		17
Animalia	Aves	Rhipiduridae	0361	Rhipidura albiscapa		Grey Fantail	P		4
Animalia	Aves	Rhipiduridae	0364	Rhipidura leucophrys		Willie Wagtail	P		2
Animalia	Aves	Corvidae	0930	Corvus corono ides		Australian Raven	P		1
Animalia	Aves	Corvidae	9902	Corvus orru		Torresian Crow	P		1
Animalia	Aves	Corvidae	0868	Corvus tasmanicus		Forest Raven	P		3
Animalia	Aves	Monarchidae	0415	Grallina cyanoleuca		Magpie-lark	P		1
Animalia	Aves	Corcoracidae	0693	Corcorax melanorhamphos		White-winged Chough	Ρ		43
Animalia	Aves	Petroicidae	0377	Microeca fascinans		Jacky Winter	P		1
Animalia	Aves	Petroicidae	0380	Petroica boodang		Scarlet Robin	V,P		4
Animalia	Aves	Acrocephalidae	0524	Acrocephalus australis		Australian Reed-Warbler	P		1
Animalia	Aves	Locustellidae	0522	Poodytes gramineus		Little Grassbird	P		1
Animalia	Aves	Hirundinidae	0357	Hirundo neoxena		Welcome Swallow	P		1
Animalia	Aves	Sturnidae	0998	Acridotheres tristis	100	Common Myna			1
Animalia	Aves	Zosteropidae	0574	Zosterops lateralis		Silvereye	P		1
Animalia	Aves	Dicaeldae	0564	Dica eu m hi ru ndin ace um		Mistletoebird	P		2
Animalia	Aves	Motacillidae	0647	Anthus novaeseelandiae		Australian Pipit	P		1
Animalia	Mammalia	Tachyglossidae	1003	Tachyglossus aculeatus		Short-beaked Echidna	P		10
Animalia	Mammalia	Dasyuridae	1027	Antechinus flavipes		Yellow-footed Antechinus	P		3
Animalia	Mammalia	Dasyuridae	T093	Antechinus sp.		Unidentified Antechinus	P		6
Animalia	Mammalia	Dasyuridae	T105	Dasyuridae sp.		unidentified dasyurid	P		3
Animalia	Mammalia	Dasyuridae	1800	Sminthopsis sp.		Dunnart	P		1
Animalia	Mammalia	Phascolarctidae	1162	Phascolarctos cinereus		Koala	E1,P	E	6
Animalia	Mammalia	Vombatidae	1165	Vombatus ursinus		Bare-nosed Wombat	P		1
Animalia	Mammalia	Petauridae	1138	Petaurus breviceps		Sugar Glider	P		2
Animalia	Mammalia	Pseudocheiridae	1133	Petauroides volans		Southern Greater Glider	E1, P	E	10
Animalia	Mammalia	Pseudo cheiridae	1129	Pseudocheirus peregrinus		Common Ringtail Possum	P		10
Animalia	Mammalia	Phalangeridae	T082	Trichosurus sp.		brushtail possum	P		7
Animana	Mammalia	Phalangeridae	1113	Trichosurus vulpecula		Common Brushtail Possum	P		28
	Mammalia	Macropodidae	T108	Macropod sp.		unidentified macropod	P		7
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Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia	Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia	Macropodidae Macropodidae Macropodidae Molossidae Vespertilionidae Vespertilionidae Miniopteridae Muridae Muridae	1261 1266 1242 1324 1352 1022 3330 1412 1408	Notamacropus rufogriseus Osphranter robustus Wallabia bicolor Austronomus australis Chalinolobus picatus Vespadelus darlingtoni Miniopterus orianae oceanensis Mus musculus Rattus rattus		Eastern Grey Kangaroo Red-necked Wallaby Common Wallaroo Swam p Wallaby White-striped Freetail-bat Little Pied Bat Large Forest Bat Large Bent-winged Bat House Mouse Black Rat	P P V,P V,P		5 965 3 1 1 2 2 1 30
Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia	Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia	Macropodidae Macropodidae Molcopodidae Vespertilionidae Vespertilionidae Miniopteridae Muridae Muridae Muridae Canidae	1261 1266 1242 1324 1352 1022 3330 1412 1408 T094 T106	Notama cropus rufogriseus Osphranter robustus Wallabia bicolor Austronomus australis Chalinolobus picatus Vespadelus darlingtoni Miniopterus orianae oceanensis Mus musculus Rattus rattus Rattus rattus Rattus sp. Canidae sp.	•	Eastern Grey Kangaroo Red-necked Wallaby Common Wallaroo Swam p Wallaby White-striped Freetail-bat Little Pied Bat Large Forest Bat Large Forest Bat House Mouse Black Rat rat unidentified canid	P P V,P V,P		5 965 3 1 1 2 1 30 76 8
Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia	Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia	Macropodidae Macropodidae Macropodidae Molossidae Vespertilionidae Vespertilionidae Miniopteridae Muridae Muridae Muridae Canidae Canidae	1261 1266 1242 1324 1352 1022 3330 1412 1408 T094 T106 1531	Notama cropus rufogriseus Osphranter robustus Wallabia bicolor Austronomus australis Chalinolobus picatus Vespadelus darlingtoni Miniopterus orianae oceanensis Mus musculus Rattus rattus Rattus sp. Canidae sp. Canis lupus	•	Eastern Grey Kangaroo Red-necked Wallaby Common Wallaroo Swamp Wallaby White-striped Freetail-bat Little Pied Bat Large Forest Bat Large Forest Bat Large Bent-winged Bat House Mouse Black Rat rat unidentified canid Dingo, domestic dog	P P V,P V,P		5 965 3 1 1 2 1 30 76 8 1
Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia	Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia	Macropodidae Macropodidae Macropodidae Molossidae Vespertilionidae Vespertilionidae Miniopteridae Muridae Muridae Canidae Canidae Canidae	1261 1266 1242 1324 1352 1022 3330 1412 1408 T094 T106 1531 1532	Notama cropus rufogriseus Osphranter robustus Wallabia bicolor Austronomus australis Chalinolobus picatus Vespadelus darlingtoni Miniopterus orianae ocean ensis Mus musculus Rattus rattus Rattus sp. Canidae sp. Canidae sp. Canis lupus Vulpes vulpes	:	Eastern Grey Kangaroo Red-necked Wallaby Common Wallaroo Swam p Wallaby White-striped Freetail-bat Little Pied Bat Large Forest Bat Large Forest Bat Large Bent-winged Bat House Mouse Black Rat rat unidentified canid Dingo, domestic dog Fox	P P V,P V,P		5 965 3 1 1 2 1 30 76 8 1 777
Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia	Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia	Macropodidae Macropodidae Molossidae Vespertilionidae Vespertilionidae Miniopteridae Muridae Muridae Muridae Canidae Canidae Canidae Canidae	1261 1266 1242 1324 1352 1022 3330 1412 1408 T094 T106 1531 1532 1510	Notama cropus rufogriseus Osphranter robustus Wallabia bicolor Austronomus australis Chalinolobus picatus Vespadelus darlingtoni Miniopterus orianae ocean ensis Mus musculus Rattus rattus Rattus sp. Canidae sp. Canis lupus Vulpes vulpes Oryctolagus cuniculus	:	Eastern Grey Kangaroo Red-necked Wallaby Common Wallaroo Swam p Wallaby White-striped Freetail-bat Little Pied Bat Large Forest Bat Large Bent-winged Bat House Mouse Black Rat rat unidentified canid Dingo, domestic dog Fox Rabbit	P P V,P V,P		5 965 3 1 1 2 1 30 76 8 1 777 20
Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia Animalia	Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia Mammalia	Macropodidae Macropodidae Macropodidae Molossidae Vespertilionidae Vespertilionidae Miniopteridae Muridae Muridae Canidae Canidae Canidae	1261 1266 1242 1324 1352 1022 3330 1412 1408 T094 T106 1531 1532	Notama cropus rufogriseus Osphranter robustus Wallabia bicolor Austronomus australis Chalinolobus picatus Vespadelus darlingtoni Miniopterus orianae ocean ensis Mus musculus Rattus rattus Rattus sp. Canidae sp. Canidae sp. Canis lupus Vulpes vulpes	:	Eastern Grey Kangaroo Red-necked Wallaby Common Wallaroo Swam p Wallaby White-striped Freetail-bat Little Pied Bat Large Forest Bat Large Forest Bat Large Bent-winged Bat House Mouse Black Rat rat unidentified canid Dingo, domestic dog Fox	P P V,P V,P		5 965 3 1 1 2 1 30 76 8 1 777

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Animalia	Unknown	Unknown Fauna	T355	Bird sp.		Unidentified Bird	3
Animalia	Unknown	Unknown Fauna	T350	Fa una sp.		Unidentified Fauna	7
Inimalia	Unknown	Unknown Fauna	T351	Mammal sp.		Unidentified Mammal	15
Animalia	Unknown	Unknown Fauna	T353	Small mammal sp.		Unidentified small mammal (<500g)	3
Plantae	Flora	Acanthaceae	1003	Bruno niella au stralis		Blue Trumpet	7
lantae	Flora	Acanthaceae	12393	Rostellularia a dscendens var. ad scendens			4
lantae	Flora	Amaran thace ae	6478	Alternanthera denticulata		Lesser Joyweed	1
lantae	Flora	Apiaceae	1109	Daucus glochidiatus		Native Carrot	1
lantae	Flora	Apiaceae	1128	Hydrocotyle laxiflora		Stinking Pennywort	18
lantae	Flora	Apiaceae	1132	Hydrocotyle tripartita		Pennywort	1
lantae	Flora	Apiaceae	1138	Oreomyrrhis eriopoda		Australian Carraway	4
lantae	Flora	Araliaceae	1211	Polyscias samb ucifol ia		Elderberry Panax	1
lantae	Flora	Asparagace æ	12649	Arthropodium fimbriatum			1
lantae	Flora	Asphodelaceae	3531	Bulbine bulbosa		Bulbine Lily	2
lantae	Flora	Asphodelaceae	3540	Dianella caerulea		Blue Flax-lily	3
lantae	Flora	Asphodelaceae	7580	Dianella revoluta var.			3
to a second	Ele en	Annington on a	0022	revoluta		Norlines Fem	
lantae	Flora	Aspleniaceae	8033	Asplenium flabelli folium		Necklace Fern	1
lantae	Flora	Asteraceae	1263	Ammobium alatum			
lantae	Flora	Asteraceae	6872	Brachyscome microcarpa			1
lantae	Flora	Asteraceae	10408	Brachyscome multifida var. multifida			1
lantae	Flora	Asteraceae	7911	Brachyscome nova-anglica			7
lantae	Flora	Asteraceae	7357	Brachyscome spathulata			3
lantae	Flora	Asteraceae	1337	Calotis cuneifolia		Purple Burr-Daisy	1
lantae	Flora	Asteraceae	1370	Cassinia quinquefaria		-0	13
lantae	Flora	Asteraceae	14360	Centipeda minima subsp.		spreading snee æweed	1
lantae	Flora	Asteraceae	8559	mini ma Chrysocephal um a picu lat um		Common Everlasting	6
La participa de la compañía de la co	Fieres	A-1	1400	Oralium cadanas		Con or Thirdle	10
lantae	Flora	Asteraceae	1400	Cirsium vulgare		Spear Thistle	19
lantae	Flora	Asteraceae	1404	Conyza bonariensis	:	Flaxleaf Fleabane	1
lantae	Flora	Asteraceae	1408	Conyza parva	÷.	Fleabane	5
lantae	Flora	Asteraceae	1426	Cymbonotus lawsonianus		Bear's Ear	9
lantae	Flora	Asteraceae	11439	Euchiton japonicus			3
lantae	Flora	Asteraceae	9690	Euchiton sphaericus		Star Cudweed	1
lantae	Flora	Asteraceae	14493	Gamochaeta coarctata	•		3
lantae	Flora	Asteraceae	1540	Hypochaeris glabra	•	Smooth Catsear	17
lantae	Flora	Asteraceae	8788	Hypoch aeris ra dica ta	•	Catsear	38
lantae	Flora	Asteraceae	1551	Lagenifera stipitata		Blue Bottle-daisy	2
lantae	Flora	Asteraceae	11960	Lagenophora stipitata		Common Lagen ophora	7
lantae	Flora	Asteraceae	11831	Leptorhynchos squamatus subsp. squamatus			1
lantae	Flora	Asteraceae	1590	Olearia elliptica		Sticky Daisy-bush	12
lantae	Flora	Asteraceae	1591	Olearia erubescens		Pink-tip Daisy-bush	3
lantae	Flora	Asteraceae	1618	Olearia viscidula		Wallaby Weed	29
lantae	Flora	Asteraceae	8557	Ozo tham nus diosmifolius		White Dogwood	1
lantae	Flora	Asteraceae	7914	Senecio diaschides			2
lantae	Flora	Asteraceae	11634	Senecio prenanthoides			20
lantae	Flora	Asteraceae	8253	Solenogyne bellioides		Solengyne	1
lantae	Flora	Asteraceae	7398	Solenogyne gunnii		Solengyne	11
lantae lantae			1698	Taraxacum officinale		Dandelion	8
lantae lantae	Flora	Asteraceae		Vittadinia cuneata	~	Dangeron	6
	Flora	Asteraceae	1711				
lantae	Flora	Asteraceae	1716	Vittadinia muelleri		Colden Eugenetica	6
lantae	Flora	Asteraceae	11377	Xerochrysum bracteatum		Golden Everlasting	2
lantae	Flora	Boraginaceae	1747	Cynoglossum a ustrale			8
lantae	Flora	Campanulaceae	1929	Wahlenbergia communis		Tufted Bluebell	3
lantae	Flora	Campanulaceae	8735	Wahlenbergia planiflora subsp. longipila			1
lantae	Flora	Campanulaceae	8281	Wahlenbergia planiflora subsp. planiflora		Flat Bluebell	12
lantae	Flora	Caryo phyllaceae	1966	Dianthus armeria	•	Deptford Pink	1
lantae	Flora	Caryophyllaceae	7584	Petrorhagia nanteuilii	•	Proliferous Pink	1
Plantae	Flora	Caryophyllaceae	1985	Scleran thus biflorus		Two-flowered Knawel	10
lantae	Flora	Caryophyllaceae	2002	Stellaria angustifolia		Swamp Starwort	1



Disates	Ele en	Consideration	2017	All second		Facest Oak	
Plantae Plantae	Flora	Casuarinaceae Chenopodiaceae	2017 2084	Alloca suarina to rulosa Cheno podium album		Forest Oak Fat Hen	1
riantae	riota	cherropoulaceae	2004	Chenopolatin album		rather	-
Plantae	Flora	Chenopodiaceae	15125	Dysphania carinata		Keeled Goosefoot	1
Plantae	Flora	Chenopodiaceae	2111	Einad ia n uta ns		Clim bing Salt bush	1
Plantae	Flora	Clusiaceae	7240	Hypericum gramineum		Small St John's Wort	14
Plantae	Flora	Clusiaceae	2203	Hypericum japonicum		Shan Strong Work	2
Plantae	Flora	Clusiaceae	2204	Hypericum perforatum		St. Johns Wort	1
Plantae	Flora	Com melin aceae	6788	Murdannia graminea			1
Plantae	Flora	Convolvulaceae	2220	Convolvulus erubescens		Pink Bindweed	1
Plantae	Flora	Convolvulaceae	2222	Dich ondra repens		Kidney Weed	33
Plantae	Flora	Convolvulaceae	15127	Dichondra sp. Inglewood			2
Plantae	Flora	Cyperaceae	2310	Carex appressa		TallSedge	1
Plantae	Flora	Cyperaceae	2313	Carex brevicul mis			1
Plantae	Flora	Cyperaceae	2322	Carex gaudi chau dian a			5
Plantae	Flora	Cyperaceae	2327	Carex inversa		Knob Sedge	8
Plantae	Flora	Cyperaceae	2374	Cyperus gracilis		Slender Flat-sedge	2
Plantae	Flora	Cyperaceae	2383	Cyperus lucidus		Leafy Flat Sedge	4
Plantae	Flora	Cyperaceae	6402	Lepid osperma laterale		Variable Sword-sedge	2
Plantae	Flora	Cyperaceae	2491	Schoenus apogon		Fluke Bogrush	4
Plantae	Flora	Dennstaedtiaceae	6403	Pteridium esculentum		Bracken	24
Plantae	Flora	Dilleniaceae	2526	Hibbertia acicularis			4
Plantae	Flora	Dilleniaceae	2539	Hibbertia linearis			20
Plantae	Flora	Dilleniaceae	2542	Hibbertia obtusifolia		Hoary Guinea Flower	10
Plantae	Flora	Dilleniaceae	2545	Hibbertia riparia			5
Plantae	Flora	Ericace ae	2586	Brachylom a da phn oides		Daphne Heath	1
Plantae	Flora	Ericaceae	10690	Brachylom a da phn oides			2
Discourse	The second	-	2502	subsp. glabrum		6 111 11	2
Plantae	Flora	Ericaceae	2599	Epacris microphylla		Coral Heath	2
Plantae	Flora	Ericaceae	2613	Leucopogon biflorus			2
Plantae	Flora	Ericace ae	2620	Leucopogon fraseri			3
Plantae	Flora	Ericace ae	2624	Leucopogon lanceolatus			1
Plantae	Flora	Ericace ae	6425	Leucopogon lanceolatus var. lan ceolatus			16
Plantae	Flora	Ericace ae	2642	Lissan the strigosa		Peach Heath	6
Plantae	Flora	Ericace ae	10713	Lissanthe strigosa subsp.			49
Plantae	Flora	Ericaceae	2646	strigosa Melichrus urceolatus		Urn Heath	37
Plantae	Flora	Ericaceae	2649	Monotoca scoparia		Unineau	5
Plantae	Flora	Fabaceae	2790	Bossiaea scortechinii			1
		(Faboideae)					
Plantae	Flora	Fabaceae (Faboideae)	2822	Daviesia genistifolia		Broom Bitter Pea	5
Plantae	Flora	Fabace ae	2823	Daviesia latifolia		Bitter-pea	3
Diantes	<b>6</b> 1	(Faboideae)	-	Differentia de Recoldera			
Plantae	Flora	Fabaceae (Faboideae)	7225	Dillwynia phylicoides		Parrot-pea	5
Plantae	Flora	Fabaceae	8734	Dillwynia sieberi			1
		(Faboideae)		1			
Plantae	Flora	Fabace ae	2860	Glycine clandestina		Twining glycine	14
Disetse	Flores	(Faboideae) Fabaceae	1001	Churcle of tech statis of		Variable Chains	3
Plantae	Flora	(Faboideae)	2861	Glycine tabacina		Variable Glycine	3
Plantae	Flora	Fabaceae	15314	Grona varians			28
		(Faboideae)					
Plantae	Flora	Fabace ae	2873	Hardenbergia violacea		False Sarsaparilla	12
Plantae	Flora	(Faboideae) Fabaceae	2876	Hovea linearis			1
		(Faboideae)					
Plantae	Flora	Fabaceae	2882	indigofera australis		Australian Indigo	1
Plantae	Flora	(Faboideae) Fabaceae	8690	Lespedeza juncea subsp.			4
Plantae	Flora	(Faboideae)	2920	sericea Madicano minima		Woolly Burr Medic	3
Plantae	FIOTA	Fabaceae (Faboideae)	2920	Medicago minima		w oblig burn Medic	3
Plantae	Flora	Fabace ae	2922	Medicago polymorpha	•	Burr Medic	1
Plantae	Flora	(Faboideae) Fabaceae	15128	Oxytes brachypoda		Large Tick-trefoil	2
Plantan	Flora	(Faboideae)	3003	Pultanaea microphulla			13
Plantae		Fabaceae (Faboideae)	3003	Pultenaea microphylla			13
Plantae	Flora	Fabaceae (Faboideae)	11810	Pultenaea setulosa			6
Plantae	Flora	Fabaceae	3073	Trifolium arvense	•	Haresfoot Clover	1
Disease		(Faboideae)		7.4.0		une di	
Plantae	Flora	Fabaceae (Faboideae)	3074	Trifolium campestre	•	Hop Clover	1
	Planet and	Fabaceae	3758	Acacia dealbata		Silver Wattle	4
Plantae	Flora	rabaceae	3730	ricucia acanadia		Silver Watte	



Plantae	Flora	Fabaceae	11006	Acacia dealbata subsp.	Silver Wattle			31
Disease	<b>5</b> 1	(Mimosoideae)	2772	dealb ata	Free Los of Manual			
Plantae	Flora	Fabaceae (Mimosoideae)	3773	Acacia filicifolia	Fern-leaved Wattle			1
Plantae	Flora	Fabaceae (Mimosoideae)	3792	Acacia implexa	Hickory Wattle			2
Plantae	Flora	Fabaceae	3869	Acacia rubida	Red-stemmed Wattle			4
Plantae	Flora	(Mimosoideae) Fabaceae	3893	Acacia ulicifolia	Prickly Moses			1
Diseter	<b>F</b> 10	(Mimosoideae)	12024	Colored to an Instan	College College			
Plantae	Flora Flora	Gentianaceae Geraniaceae	13834 8226	Schenkia spicata Geranium solanderi var.	Spike Centaury			5 29
				solanderi				
Plantae	Flora	Goodeniaceae	8711	Goodenia bellidifolia subsp. bellidifolia				7
Plantae	Flora	Goodeniaceae	9279	Goodenia hederacea subsp. hederacea				1
Plantae	Flora	Goodeniaceae	3196	Goodenia rotundifolia				2
Plantae	Flora	Haloragaceae	8649	Gonocarpus micranthus subsp. micranthus				5
Plantae	Flora	Haloragaceae	3247	Gonocarpus tetragynus	Poverty Raspwort			11
Plantae	Flora	Haloragaceae	3248	Gonocarpus teucrioides	Germander Raspwort			5
Plantae	Flora	Haloragaceae	3252	Haloragis heterophylla	Variable Raspwort			12
Plantae	Flora	Juncaceae	3326	Juncus continuus				1
Plantae	Flora	Juncaceae	8236	Juncus fockei				1
Plantae	Flora	Juncaceae	3333	Juncus homalocaulis				1
Plantae	Flora	Juncaceae	3339	Juncus pauciflorus				1
Plantae	Flora	Juncaceae	8521	Juncus remotifiorus				3
Plantae	Flora	Juncaceae	3350	Juncus usitatus				15
Plantae	Flora	Juncaceae	3356	Luzu la d'ensiflora	Woodrush			2
Plantae	Flora	Lamiaceae	3371	Ajuga australis	Austral Bugle			2
Plantae	Flora	Lamiaceae	3381	Marrubium vulgare	Winte Hoteroona			1
Plantae	Flora	Lamiaceae	3387	Mentha satureioides	Native Pennyroyal			15
Plantae	Flora	Lauraceae	3469	Cassytha pubescens	Downy Dodder-laurel			4
Plantae	Flora	Lomandraceae	6298	Lomandra cylindrica				1
Plantae	Flora	Lomandraceae	6511	Lomandra filiformis subsp. coriacea	Wattle Matt-rush			5
Plantae	Flora	Lomandraceae	6308	Loma ndra longifolia	Spiny-headed Mat-rush			10
Plantae	Flora	Lomandraceae	8802	Lomandra multiflora subsp. multiflora	Many-flowered Mat-rush			21
Plantae	Flora	Loranthaceae	6394	Amyema miquelii	Box Mistletoe			3
Plantae	Flora	Loranthaceae	3607	Amyema pendula				1
Plantae	Flora	Malvaceae	3660	ino diora caro minaria	Red-flowered Mallow			1
Plantae	Flora	Myrtaceae	4051	Eucalyptus banksii	Tenterfield Woollybutt			9
Plantae	Flora	Myrtaceae	4057	Eucalyptus blakelyi	Blakely's Red Gum			13
Plantae	Flora	Myrtaceae	4061 4064	Eucal ypt us brid gesian a	Apple Box			22
Plantae Plantae	Flora	Myrtaceae Myrtaceae	7361	Eucalyptus caliginosa Eucalyptus dalrympleana	Broad-leaved Stringybark			10
riantae	riota	Wyttaceae	1301	subsp. heptantha				10
Plantae	Flora	Myrtaceae	4112	Eucalyptus laevopinea	Silver-top Stringybark			18
Plantae	Flora	Myrtaceae	4120	Eucalyptus macrorhyncha	Red Stringybark			1
Plantae	Flora	Myrtaceae	4125	Eucalyptus melliodora	Yellow Box			28
Plantae	Flora	Myrtaceae	4134	Eucalyptus nicholii	Narrow-leaved Black Peppermint	Y	v	3
Plantae	Flora	Myrtaceae	8618	Eucalyptus nobilis	Forest Ribbon Gum			12
Plantae	Flora	Myrtaceae	4139	Eucalyptus nova-anglica	New England Peppermint			7
Plantae	Flora	Myrtaceae	4140	Eucalyptus o bliqua	Messmate			3
Plantae	Flora	Myrtaceae	4151	Eucalyptus pauciflora	White Sally			1
Plantae	Flora	Myrtaceae	8696	Eucalyptus radiata subsp. seiuncta				12
Plantae	Flora	Myrtaceae	4187	Eucalyptus stellulata	Black Sally			1
Plantae	Flora	Myrtaceae	8650	Eucalyptus subtilior				4
Plantae	Flora	Myrtaceae	4199	Eucalyptus youmanii	Youman's Stringybark			31
Plantae	Flora	Myrtaceae	8647	Leptospermum gregarium				3
Plantae	Flora	Myrtaceae	8198	Leptospermum polygalifolium subsp. montanum				7
Plantae	Flora	Onagraceae	4326	Epilo bium bil lardierian um				7
Plantae	Flora	Orchidaceae	4376	Cala denia cuculla ta	Hooded Caladenia	P		1
Plantae	Flora	Orchidaceae	7231	Cala denia fusca ta	Dusky Fingers	Р		1
Plantae	Flora	Orchidaceae	8897	Pterostylis abrupta		Р		1
Plantae	Flora	Orchidaceae	4560	Pterostylis mutica	Midget Greenhood	P		2
Plantae	Flora	Oxalidaceae	4612	Oxalis chnoodes				1
Plantae	Flora	Oxalidaceae	4613	Oxalis corniculata	Creeping Oxalis			1
Plantae Plantae	Flora	Oxalidaceae	4621	Oxalis perennans				13
ACCEPTER OF	Flora	Oxalidaceae	4624	Oxalis radicosa				4
Plantae	Flora	Phyllanthaceae	6751	Phylla nthus virgatus	Wiry Spurge			3



	-		10.000					
Plantae	Flora	Phytolaccaceae	4658	Phytolacca octandra	•	Inkweed		1
Plantae Plantae	Flora	Pittosporaceae Pittosporaceae	4671	Billardiera scandens		Hairy Apple Berry Native Blackthorn		2 4
Plantae	Flora	Pittosporaceae	4674 8623	Bursaria spinosa Rhytidosporum procumbens		Native blackthorn		1
riantae	riota	rictosporaceae	0025	nny o dosporum procumbens	1			*
Plantae	Flora	Plantaginaceae	4691	Plantag o debilis		Shade Plantain		2
Plantae	Flora	Plantaginaceae	4699	Plan tago l'anceolata	•	Lamb's Tongues		2
Plantae	Flora	Plantaginaceae	4705	Plan tago varia				3
Plantae	Flora	Plantaginaceae	6003	Veronica calycina		Hairy Speedwell		22
Plantae	Flora	Poaceae	4750	Antho xan thu m od ora tum	•	Sweet Vernal Grass		6
Plantae	Flora	Poaceae	6933	Aristida jerichoensis var. subspinulifera		Jericho Wiregrass		10
Plantae	Flora	Poaceae	4767	Aristida personata				4
Plantae	Flora	Poaceae	ARIS	Aristida spp.				1
Plantae	Flora	Poaceae	10396	Austrostipa rudis				3
Plantae	Flora	Poaceae	10398	Austrostipa rudis subsp. nervosa				1
Plantae	Flora	Poaceae	AUSO	Austrostipa spp.				1
Plantae	Flora	Poaceae	11194	Axono pus fissifoli us	•	Narrow-leafed Carpet Grass		2
Plantae	Flora	Poaceae	4790	Bothriochloa macra		Red Grass		9
Plantae	Flora	Poaceae	4806	Bromus diandrus	•	Great Brome		1
Plantae	Flora	Poaceae	14952	Cenchrus purpurascens				9
Plantae	Flora	Poaceae	4841	Cymbopogon refractus		Barbed Wire Grass		5
Plantae	Flora	Poaceae	4898	Dichelachne micrantha		Shorthair Plumegrass		6
Plantae	Flora	Poaceae Poaceae	8767 7593	Dichelachne parva		Tufted Hadashaa Grass		4
Plantae	Flora			Echin opog on caespitosus var. caespitosus		Tufted Hedgehog Grass		
Plantae	Flora	Poaceae	4934	Echinopogon ovatus		Forest Hedgehog Grass		3
Plantae	Flora	Poaceae	4960	Eragrostis leptostach ya		Paddock Lovegrass		2
Plantae	Flora	Poaceae	4996	Glyceria a ustralis		Australian Sweetgrass		4
Plantae	Flora	Poaceae	4998	Glyceria latispicea		March 1997 Provide Law		2
Plantae	Flora	Poaceae	5005	Holcus lanatus		Yorkshire Fog		7
Plantae	Flora	Poaceae	6803	Imperata cylindrica		Blady Grass		1 54
Plantae	Flora	Poaceae	7707	Microlaena stipoides var. stipoides		Weeping Grass		
Plantae	Flora	Poaceae	5086	Paspalum dilatatum	*	Paspalum		3
Plantae	Flora	Poaceae	5106	Phalaris aquatica	•	Phalaris		1
Plantae	Flora	Poaceae	11196	Poa labillardierei var. labillardierei		Tussock		2
Plantae	Flora	Poaceae	5141	Poa sieberiana		Snowgrass		6
Plantae	Flora	Poaceae	8742	Poa sieberiana var. sieberiana		Snowgrass		43
Plantae	Flora	Poaceae	14304	Rytid osperma biparti tum		Wallaby Grass		4
Plantae	Flora	Poaceae	14305	Rytid osperma ca espito sum		Ringed Wallaby Grass		3
Plantae	Flora	Poaceae	14311	Rytid osper ma la eve		Wallaby Grass		8
Plantae	Flora	Poaceae	14314	Rytid osperma palli dum		Redanther Wallaby Grass; Silvertop Wallaby Grass		22
Plantae	Flora	Poaceae	14318	Rytidosperma racemosum var. racemosum		Wallaby Grass		3
Plantae	Flora	Poaceae	14323	Rytid osperma tenuius				1
Plantae	Flora	Poaceae	5173	Sorghum leiocladum		Wild Sorghum		7
Plantae	Flora	Poaceae	5179	Sporobolus creber		Slender Rat's Tail Grass		1
Plantae	Flora	Poaceae	7770	Themeda triandra				12
Plantae	Flora	Poaceae	5242	Vulpia myuros	•	Rat's Tail Fescue		1
Plantae	Flora	Polygonaceae	5265	Acetosella vulgaris	•	Sheep Sorrel		2
Plantae	Flora	Polygonaceae	5296	Rumex brownii		Swamp Dock		8
Plantae Plantae	Flora Flora	Primulaceae Proteaceae	14614 10967	Lysimach ia a rvensis Grevillea juni peri na subsp.	•	Scarlet Pimpernel		2
				allo joh nson li				
Plantae	Flora	Proteaceae	5445	Lomatia silaifolia		Crinkle Bush	P	3
Plantae	Flora	Pteridaceae	8007	Cheilanthes sieberi subsp. sieberi		Rock Fern		9
Plantae	Flora	Pteridaceae	10489	Pellaea calidi rupium				1
Plantae	Flora	Ranunculaceae	6903	Clematis glycinoides var. glycinoides				2
Plantae	Flora	Ranunculaceae	5508	Ran unculus lappaceus		Common Buttercup		4
Plantae	Flora	Rhamnace ae	5554	Cryptandra amara		Bitter Cryptandra		7
Plantae	Flora	Rhamnaceae	5564	Discaria pubescens		Australian Anchor Plant		1
Plantae	Flora	Rosaceae	5604	Acaena novae-zelandia e		Bidgee-widgee		33
Plantae	Flora	Rosaceae	5635	Rosa rubiginosa	•	Sweet Briar		17
Plantae	Flora	Rosaceae	5642	Rub us parvifolius		Native Raspberry		11
Plantae	Flora	Rosaceae	5646	Rub us ul mifolius	•	Blackberry		13
Plantae	Flora	Rublaceae	5652	Asperula charophyton		Strapleaf Woodruff		1
Plantae	Flora	Rubiaceae	5653	Asperula conferta		Common Woodruff		9
Plantae	Flora	Rubiaceae	5660	Asperula su buli folia				1



Plantae	Flora	Rubiaceae	15580	Galium ciliare subsp. ciliare					2
Plantae	Flora	Rubiaceae	13838	Gallum leiocarpum					5
Plantae	Flora	Rubiaceae	13893	Galium leptogonium					2
Plantae	Flora	Rubiaceae	5688	Galium propinguum		Maori Bedstraw			5
Plantae	Flora	Rubiaceae	5697	Opercularia a spera		Coarse Stinkweed			3
Plantae	Flora	Rubiaceae	5698	Opercularia diphylla		Stinkweed			4
Plantae	Flora	Rubiaceae	5699	Opercularia hispida		Hairy Stinkweed			2
Plantae	Flora	Rubiaceae	5703	Poma x um bella ta		Pomax			1
Plantae	Flora	Rutaceae	5751	Boronia polygalifolia		Dwarf Boronia	P		1
Plantae	Flora	Salicaceae	5848	Populus alba		White Poplar			1
Plantae	Flora	Santalaceae	5860	Exocarpos cupressiformis		Cherry Ballart			1
Plantae	Flora	Santalaceae	5871	Thesium australe		Austral Toadflax	v	٧	1
Plantae	Flora	Scrophulariaceae	7625	Verbascum thapsus subsp. thapsus	•	Great Mullein			3
Plantae	Flora	Solanaceae	6091	Solanum nigrum	•	Black-berry Nightshade			1
lantae	Flora	Stackhousiaceae	6120	Stackhousia mo nog yna		Creamy Candles			1
Plantae	Flora	Stackhousiaceae	6125	Stackhousia viminea		Slender Stackhousia			1
lantae	Flora	Stylidiaceae	6157	Stylidium graminifolium		Grass Triggerplant			2
Plantae	Flora	Thymelaeaceae	6774	Pimelea curviflora var. diveraens					3
lantae	Flora	Thymelaeaceae	6182	Pimelea linifolia		Slender Rice Flower			1
lantae	Flora	Thymelaeaceae	6192	Pimelea strigosa					1
lantae	Flora	Urticaceae	6237	Urtica incisa		Stinging Nettle			2
lantae	Flora	Violaceae	6266	Hybanthus monopetalus		Slender Violet-bush			3
lantae	Flora	Violaceae	6270	Viola betonicifolia		Native Violet			10
Plantae	Flora	Xanthorrhoeacea e	8751	Xanthorrhoea glauca subsp. alauca			Ρ		8

From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Friday, 26 January 2024 9:57:48 AM
Attachments:	draft-energy-framework-submission.docx

Submitted on Fri, 26/01/2024 - 09:42

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

# Name

**First name** John

Last name Heffernan

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Walcha 2354

**Please provide your view on the project** I object to it

Submission file draft-energy-framework-submission.docx (14.14 KB)

**Submission** Please find my submission attached

I agree to the above statement Yes

#### DRAFT WIND ENERGY FRAMEWORK SUBMISSION

The NSW Government Planning Department's recent guidelines for wind energy projects are riddled with faults and inadequacies. Matters of concern include issues linked to:

- the REZ concept and its relevance;
- proper regulation of the wind energy industry;
- protection for environmentally sensitive areas adjacent to wind projects;
- the importance and rights of regional towns;
- community and stakeholder agreements;
- · site selection and project design;
- · landscape and visual impacts of wind projects;
- noise and health issues;
- aviation safety and lighting;
- traffic impacts;
- bird and bat issues;
- benefit sharing;
- waste management;
- social license;
- critical state significant infrastructure; and
- decommissioning and rehabilitation.

Obviously such a long list would be impossible to address with anything less than a truly copious document. For that reason my submission will focus on what I regard as three major criticisms of the Department's guidelines, the (underlined) final three items on the above list:

#### SOCIAL LICENSE

A crucial requirement for the success of any wind energy project is strong social license. This is a quality only earned when a developer respects the community, engaging them in honest and transparent consultation at every stage of a project. It not only protects regional communities, but actually prevents delays and saves costs in various approval processes. Without social license, projects will almost certainly face long delays in approval, causing community resentment and hostility to the whole planning process.

This issue really does require attention in the Department's draft wind energy guidelines. Failure to do so will see social capital diminished in regional communities by unscrupulous developers as well as poorly planned and located projects. Bottom line: poor social license is a guaranteed project killer. As such, projects need to be seriously assessed as early as possible (preferably at the Scoping Stage) by not only the Planning Department but by local communities and any relevant agencies, in order to weed out inadequately planned and badly located projects.

The Department should be cognisant as to how fundamental social licence is to the success of any wind energy project. After all, when a significant percentage of a community expresses doubts and concern about a project, as Walcha has most vocally done, that really does need listening to, especially when the community is well informed on the subject, as Walcha is. So establishing a clear definition of social license, and clearly quantifying it, is surely a no-brainer.

#### **CRITICAL STATE SIGNIFICANT INFRASTRUCTURE**

This relatively new addition to the NSW Draft Wind Energy Guideline is an unfortunate move by the Planning Department, and one that I believe will prove a grave mistake. It takes us into the realm of Critical State Significant Infrastructure, <u>Critica</u> being the key

### term here. This guideline states that: **The Minister will consider requests to declare** wind energy development to be Critical State Significant Infrastructure (CSSI) if it includes a significant energy storage system (for example, a delivery capacity of 750 megawatts or more)."

It is a nasty move because it opens up the possibility of compulsory acquisition of land for wind farms. It is also barely short of a blatant about-face, given that the Planning Department has publicly declared elsewhere that wind farms will not be built without landowner consent. Now what we're talking about here is compulsory acquisition of private land, a very real threat to landholders, and totally inappropriate.

But that's not all; it gets worse. With what amounts to sneaky wording, this guideline essentially permits all manner of tricks allowing the Minister to declare a wind energy development as Critical, a CSSI project. The permitting example mentioned in the guideline (a 750 MW storage system) is just that, an example. The question that arises from this has to be: How many other examples might the Minister find acceptable? "Anybody's guess" is the answer, effectively leaving the door open to all manner of shenanigans, something that really is unacceptable.

This guideline is a thinly veiled threat and a bit of unabashed bullying, made even more unacceptable in being sneakily "promoted" to proponents and project developers, with the Planning Department proudly declaring :

#### "CSSI Projects get the benefit of significant streamlining and appeal rights protection in NSW."

That approach definitely sends out the wrong message.

### **DECOMMISSIONING AND REHABILITATION**

There's little doubt that some of the most disturbing aspects of wind farm projects can surface near the end of their life, during Decommissioning and Rehabilitation. That pair can cause nightmarish problems of monstrous proportions, financially, environmentally, socio-economically, and more. Myriad complications can arise during the life of wind farms that morph into serious problems in their dying days. The sale of a project to another operator, for instance, can result in decommissioning arrangements being totally lost or at the very least diminished, turning what was thought to be assured security into a huge headache. The AEIC (Australian Energy Infrastructure Commissioner) has warned that the standard cost to decommission a wind turbine (\$400,000-\$600,000) can vastly increase if structural failures or stability problems appear in the equipment. A company holding a wind project at the end of its life can suddenly admit to being non-financial, or simply walk away from its responsibilities, or claim it has no Rehabilitation Bond. Such things are by no means out of the ordinary. Indeed some would claim that in the wind farm game they can be the norm.

All of which highlights the extreme need for planning ahead and preparing well in setting up for decommissioning and rehabilitation. I wish I could say that the Department's guidelines provide valuable help in such preparations. But I can't because they don't. Those guidelines are actually next to useless, in some cases even a hindrance, which is a great pity because those two end-game phases, if handled poorly, can leave a dreadful legacy, not just for individual landholders, but for local communities and LGAs as well.

Sure the Department's guidelines start with strong words, declaring that: "land <u>must</u> be returned to pre-existing or agreed use if the project is decommissioned." But the tough talk soon softens, and the word **must** becomes **should**. We're told it's enough that "above-ground infrastructure **should** be removed", or that "decommissioning obligations **should** be reflected in the host agreement",

and that "outcome-based objectives of decommissioning **should** be contained in the conditions of a development consent". That's pathetic, like being flogged by a wet lettuce. Surely decommissioning and rehabilitation are areas where the strongest language must be applied, where clear rules and standards need to be unequivocally laid down and supported by legally based adherence. It is well-known that the wind energy industry is notoriously prone to shady shenanigans and cowboy cahoots, something evidenced most egregiously in the rehabilitation and decommissioning stages. A clear regime of protocols and actions need to be spelled out in detail and enforced to ensure that critical aspects of these two phases are properly taken care of.

Here are just three possible suggestions to consider in achieving this. Make it mandatory:

(1) for proponents to launch decommissioning trust funds as early as possible in a project's life, rather than ten or fifteen yeas down the track. At the very least it would certainly be easier to collect funding in this initial period;

(2) that bank guarantees, trust funds and security bonds (etc) set up by proponents/developers are held by the landowner throughout the life of a project, providing confidence that funds have definitely been put aside and secured by the proponent; and

(3) that any agreement between a landholder and the original developer must automatically carry over to be an agreement between the landholder and any new company that buys the project.

#### CONCLUSION

As I've already stated, there are many other concerns that need addressing in the Department's guidelines. The above three simply standout as warranting priority attention, but they are by no means alone, and together with the many other concerns are making regional communities increasingly disheartened, disillusioned and disgruntled by the department's approach. I can unequivocally confirm that this is definitely the case with Walcha community. Extremely well informed on wind energy issues, and used to being frequently required to express their opinions, they are growing weary of being ignored and taken for granted by government agencies.

Worse than that though, is the particularly galling sense that some government agencies are being unashamedly "**developer friendly**", displaying unacceptable bias towards projects that patently don't even pass the pub test. Poor quality projects, badly planned and located, are being unduly helped through approval processes regardless of their obvious failings. Surely agencies such as the Planning Department, for example, are there to support and promote good projects while discouraging and prohibiting poor projects. Yet the reverse seems lamentably to be the case, largely owing to the inadequacies of documents such as these wind energy guidelines. Regional communities like Walcha continue highlighting concerns in submissions like this, but while ever government agencies choose to ignore sound, on-the-ground advice there can be no hope for real progress, a situation that must be considered untenable.

I have no doubt at all that a large percentage of this community must be at the end of their tether, wondering how much longer they can continue to stomach what is an ongoing charade: the endless string of inadequate guidelines; the barely disguised trail of developer friendly bias; the endless stream of poor projects over-powering the planning process; the repeated inexcusable refusal to seriously consider valuable community input.

Regional communities are the ultimate experts when it comes to their locale. As such, their opinions, beliefs and statements should be treated with the respect they deserve. When that respect ceases to be sufficiently forthcoming from the powers that be, community frustration can quickly turn into angry backlash. How far away that situation is with our community is anybody's guess. But if the mood of the absolutely packed public meeting held by the Planning Department in Walcha last year (November 2023) is any indication, this is one community where patience is wearing very thin indeed.

JOHN HEFFERNAN 160W Legge Street, WALCHA, NSW, 2354

From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 27 January 2024 12:27:43 PM
Attachments:	submissionwind-guidelinescameron-greig.docx

Submitted on Sat, 27/01/2024 - 12:27

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

# Name

First name Cameron

Last name Greig

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Walcha

**Please provide your view on the project** I object to it

Submission file submission---wind-guidelines--cameron-greig.docx (23.64 KB)

**Submission** Please find attached my submission that objects to the Wind Guidelines in their current form. Thank you.

I agree to the above statement Yes

Cameron Greig 390 Aberbaldie Rd Walcha NSW 2354 27/1/2024

# Submission to the Draft Wind Guidelines

# Introduction

I am a long time resident of Walcha, who has become distressed by the manner in which large scale energy developments have been so poorly planned and by how this has seriously impacted our once harmonious and functional community. A large part of this destruction of social fabric is due the lack of understanding by NSW Planning, and the apparent lack of leadership and strategic input that has allowed cowboy would-be developers to seemingly run the process with little consequence for destructive practices. This Guideline seems only to encourage this one sided activity, where developers have strong-armed communities, creating division and destroying relationships, while suffering no penalty or oversight for this behaviour. In our community, we have seen a poorly designed project hang in the air for years, while the entire community (except those that have been given vast financial promises) looks on in horror at the potential consequences for the region if it were to proceed. Good projects would be welcomed, but poorly designed projects that should not have seen the planning entry door, should not be encouraged to proceed through the planning process.

I write with great concern after carefully reading and digesting the Draft Wind Energy Guidelines. I have so many concerns that to cover all, would produce a significant and wordy document. I will try to focus on a few that are of greatest concern.

# Summary of Concerns;

- 1. Decommissioning no protection for land holders or the wider community
- 2. Map changing it's legend from "Less Suitable to Desirable" to "Suitable to Highly Suitable"
- 3. No definition of social license
- 4. Forced Acquisition of Land
- 5. Lack of accreditation of developers
- 6. Lack of buffer around National parks
- 7. Lack of understanding around genuine aviation concerns
- 8. Lack of understanding around the impact of VPA's in the community.
- 9. Inadequacy of objectively rating a subjective measure. Visual Guidelines Technical Supplement.

# Detail of concerns

### 1. Decommissioning - no protection for land holders or the wider community

It seems inconceivable that the planning department has allowed the wind generator industry to install these components with no guarantee of decommissioning. Around the world we have multiple examples of abandoned wind farm sites, because the obvious occurs – a multinational or large corporate with no integrity would rather design their insolvency than to deal wit the obligation of expensive decommissioning.

For these projects, why wouldn't you? There is no bond being contributed to, and no interest from NSW Planning to introduce this simple concept. This is mandatory in the mining industry, yet wind farm developers are given a free ticket once again. And once again, the community will be asked to pay. This is a simple and disgraceful omission that can so easily be rectified, but has not been dealt with. This is a fail.

# 2. Map changing it's legend from "Less Suitable to Desirable" to "Suitable to Highly Suitable"

Once again, as demonstration of the developer friendly nature of this business, after years of putting this draft together, less than a week after release and die to a bit of developer pressure in the media, the entire premise of the wind suitability map was turned on it's head. Changin our area from "Less suitable" to "Suitable" certainly gave the developers a fat smile, but it created further mistrust and an erosion of integrity of the Planning process. "Trust the process" we are told, but why? Our community is visibly more and more enraged by the day.

The explanation given for this turnaround during the NSW planning visit to Walcha was an embarrassment.

### 3. No definition of social license

Energy Co began their commination with our community by describing that "Social License" would be the cornerstone of their charter of operation. The planning department described it as being vitally important to the engagement process, coded into the Community Consultation Committee process. It was shouted from the rooftops of Canberra. Yet, we cannot find a definition of this term anywhere. Social license, it seems, is now simply a means to hoodwink communities with a big enough bag of cash. It seems that developers are encouraged to gain social license by negotiating a VPA that is adequate enough to smooth over the local councils. This is a poor outcome for what should have been a process of honest and positive engagement. Communities should be engaged from the very beginning of the design process. They should be involved in the decision making that plans where, how big, and what shape a project should be. This would be community engagement and social license. To continue to use the term is an insult to communities that have little or no power to shape the landscape that will dominate their life for the next 30 - 60 years. Again, this is a totally one sided equation favouring developers over communities. Again, this results in agitated and disillusioned communities that will continue to resist development, rather than support it. No one wins. I find it particularly frustrating that we and others have been supportive of renewable technology as a solution, but the manner in which our community has been ridden over, and taken advantage of, has saddened and frustrated us to the point of resistance. This has been the result of a poor and cynical attempt to attain social license. In the case of Walcha, the damage has been done.

#### 4. Forced Acquisition of Land

The guidelines point to a scenario where a project designed with a significant energy storage system, can be deemed Critical State Significant Infrastructure (CSSI). If this is the case, landholder consent is not required, and forceful acquisition would take place, as per section 5.13 of the EP&A Act.

In areas such as Walcha, that are highly unsuitable areas for wind development due to tightly held land holdings and multiple neighbours to project sites, this gives free reign to an overly ambitious developer, to cause unfettered harm to the community.

When we asked about this at the Walcha Planning Department meeting, we were told that there has been a threshold set for this to occur, of 700MW of battery storage capacity. This is NOT the case. The guidelines give an EXAMPLE, not a THRESHOLD. The dismissive nature of answering and dodging these questions gives further frustration to the community, and highlights the lack of protection for landholders. Where are the protections for the community in this scenario?

#### 5. Lack of accreditation of developers

In the case of Walcha Energy in Walcha, we have a would be developer with no capital, no experience in renewable development and, it appears, very little care for the viability of the projects that they are proposing. In their own words, "that is someone else's problem". They are simply writing lease agreements, bundling them together, and trying to find a buyer. In the case of Winterbourne Wind, they found Vestas - a turbine manufacturer who are struggling with diminishing sales in Europe. Walcha Energy have found a "developer" who is simply trying to ensure sales of their turbines. Vestas have already on sold the project on the condition of development approval. For our community, neither Walcha Energy or Vestas have an interest in the community, the landscape or the success of the project - once they have got their money. This is a destructive process of eroding community trust, and relationships. There has been enormous pressure on family, neighbours and community groups resulting from this process. Harmful personal attacks have been engineered and fabricated in the name of getting a contract signed, or to discredit any scrutiny of the process. We would strongly desire a system of developer accreditation, that would eliminate the behaviour that we have seen in Walcha that is destructive, harmful and a serious departure from the tight community culture that has existed until these developments were aired. Part of the accreditation and application process should include a fee paid, that could be used by the council to carry out the necessary studies and reporting that is required to properly assess the merits or risks of these projects. This is an obligation that the council is burdened with, that they are not resourced to properly manage. If a developer is to propose such significant works, there must be fair compensation paid to the local government to carry out this assessment adequately.

Our experience is that even with guidelines, that some developers are unable to comply – even prior to approval for construction. These developers that are unable to comply during the EIS documentation and response to submission stages have demonstrated that they have little or no interest in complying with requirements after approval. We cannot understand why the planning department is holding their hand and coaching them through the process, rather than eliminating them from the process.

#### 6. Lack of buffer around National parks

Protect biodiversity – important ecological communities and habitat for native animals. 100m is some sort of sick joke that cannot be a serious solution. Wedgetail Eagles in the Walcha region, and other protected and threatened bord species are fodder in the eyes of wind turbines and to suggest 100m is an adequate buffer seems like there has been little or no thought put into this solution.

Prevent risk of contamination, erosion and run-off, introduction of invasive weeds and vermin.

Biodiversity offsets are not a solution. It is not good enough to destroy functioning ecosystems, and to attempt to offset this by a manufactured ecosystem that is located elsewhere. Once destroyed, they are lost forever.

As a minimum, a 10km buffer around National Parks, Wilderness and World heritage Areas should be adopted and maintained.

#### 7. Lack of understanding around genuine aviation concerns

There are serious and genuine concerns from aviation operators in the New England region, about the construction of wind turbines and transmission lines in this area. This geographically unique problem is two-fold;

- 1. Heavy reliance on aerial operations in the area, and
- 2. the topographically unique features of the great dividing range and the effect on weather. As the easterly weather pushes moist air up the eastern side of the ranges, the top of the ranges are often shrouded in low cloud and fog. This is dangerous enough without adding hundreds of 230m plus high wind turbines in this area. Operations such as agricultural application of chemicals, fire fighting and rescue and retrieval are simply not going to be able to be carried out if the turbines are erected. This has been verified by numerous submissions from aviation operators. It seems ludicrous for the Draft Wind Guidelines to state;

"Aerial firefighting can continue to be undertaken around wind turbines12 if appropriate strategies, emergency management systems and communications protocols are in place13. Applicants must develop and implement a bushfire management plan that includes response strategies such as shutting down and positioning turbine blades to facilitate aerial access."

Is this really saying that in a fog or cloud that a moving blade might be dangerous to an aeroplane, but a stationary one is not? This statement is dangerous, arrogant and naive. It has been refuted by aviation operators, and for an author in Canberra to dismiss these serious concerns is, sadly, symptomatic of the entire planning process. Please rectify this oversight.

#### 8. Lack of understanding around the impact of VPA's in the community.

The VPA has become a thinly veiled bribe, to win local government support for a project. It has to be stated that the interests of the local council and the community might not necessarily be aligned. For a councillor standing for a short term, or an employed General Manager who is not connected to the community and may not be once the term of his or her role is complete, a temptation to "balance the books" with an enticing monetary sum within the VPA may be alluring. For the community, it is far different.

What is the funding to be used for? We have asked these types of questions and the response has been saddening. Historically, communities like Walcha are very good at pulling together when things need to be done.

When a school group wants a playground built, when a rugby club needs a BBQ, when a show society needs a shed build, they pull together, raise funds, and make it happen. They create the community, and everything the community needs. This is what builds resilience in communities. It pulls people together, and Walcha is stronger for it.

What this developer is proposing, is an annual bucket of money, that our community groups then need to fight over, to win a benefit. Some get help, and some don't. That changes everything. This doesn't pull people together, it pulls people apart. We aren't better off because we have more. We are better off if we build what we have, ourselves. This is the essence of community that is lost on developers and government. We are lucky to have it, and we don't wish to lose it.

The developer has also proposed the narcissistic need to be recognised for every dollar that is allocated, and to sit on the committee that makes these decisions. This so called VPA, or community fund, is a inducement from the developer, to win community support. It is not a gift, it is a manufactured bribe that disrupts the way a community holds itself together. It is not a gift that a community like Walcha needs. It is certainly not a way to win "social license".

## 9. The Inadequacy of objectively rating a subjective measure. Visual Guidelines technical Supplement

<u>Reading through the Wind Energy Guidelines - Technical Supplement</u> gave me great concern that the issues of amenity were being complicated with an array of techniques designed to confuse the layman reader and complicate a simple issue. That is, that close proximity to turbines is a widely felt concern that is not being adequately addressed.

In simple terms, if developers (and the Planning Department) continue to impose large scale industrial projects in areas of tightly populated rural settings, there will be strong and determined pushback and resistance. It cannot be overcome with complex rules that obscure a simple issue.

#### Unreasonable use of screening techniques to mitigate impacts of turbines.

Calculating Magnitude using a wireframe model – an objective measure of how dominant the cumulative number of turbines dominates the view. This makes sense. However, refining this assessment by taking into account the mitigating factors of existing vegetation or other screening is a folly, (page 38 of the Technical Supplement). This current screening may well be a 30 year old tree that will be blown down in the next wind storm. This fickle reliance on non-permanent screening is unreasonable to the occupants of any dwelling that may be impacted by the presence of the turbines, albeit temporarily screened by a tree at the time of assessment. Vegetation, that is not permanent, should not be used as a "smokescreen" for visual assessment.

Why is this so wrong?

- 1. This is a temporary screen hiding a 30 year (at least) industrial structure in an otherwise natural landscape. This is not reasonable.
- 2. We are not bound in our houses to the kitchen window. That is, a view from behind a tree is not the only place we spend our time. Our property is our home, and we spend time anywhere on it. Focusing on one room in one house on that property is a city centric notion.
- 3. This technique of hiding behind trees is a trick that can be manipulated by the visual consultant on behalf of the developer. We have seen first hand this deceptive behaviour of a consultant for Winterbourne Wind Farm, by walking 30m from the house to set up a camera behind a tree, obscuring 30% of the view, so that the "modelled" turbines cannot be seen from behind the tree. Allowing this deceitful and misleading behaviour, or facilitating it, is in many ways, quite unbelievable.

Many other aspects within the Technical Supplement are equally disappointing, for example, the subjective manner in which scenic quality is given a rating of low moderate or high. This is judged from where? Someone on a government salary in Canberra? Judging the quality of the view from someone's loved, chosen and hard won property by a High, Medium or Low measure seems simplistic. To say this has the potential to be insensitive is putting it lightly.

#### Conclusion

We, as a community, feel that these guidelines are heavily weighted in the favour of developers, and offer little to no protection to the communities that are carrying the burden of this development. In many cases, these are communities made up of members who have chosen to live in these areas, forsaking many of the comforts and amenities of larger centres, in favour of working with nature and withing the environment of these beautiful areas. To be imposed with significant industrial development is causing distress within the community, and to read a guideline that offers little or no protection is adding to that distress.

This draft needs a total overhaul before it can be described as a document that offers any protection to communities. We cannot support it in its current form.

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 27 January 2024 12:35:57 PM
Attachments:	noise-guidelines-27 1 24.pdf

Submitted on Sat, 27/01/2024 - 12:29

Submitted by: Anonymous

Submitted values are:

#### Submission Type

I am making a personal submission

### Name

First name Margaret

Last name Conn

I would like my name and personal contact details to remain confidential No

## Info

Email

**Suburb/Town & Postcode** Mudgee NSW 2850

**Please provide your view on the project** I am just providing comments

Submission file noise-guidelines-27\_1\_24.pdf (182.32 KB)

#### Submission

My submission is attached separately.

I do not object to the Review of the Guidelines (it is essential) but the noise guidelines continue to be patently inadequate to deal with the issues which have arisen in relation to noise impacts from wind farms in NSW. Until these issues are dealt with specifically by the regulations and not left in the hands of proponents, the problems will continue and the communities impacted by wind farms will continue to be resistant and opposed. My submission is attached.

I agree to the above statement

Yes

#### Wind Farm Noise Assessment NSW

#### Background

The present planning framework in NSW is:

• SEARs require:

• an assessment of the likely impacts of all stages of the development (including the cumulative impacts of the development ...) ...taking into consideration any relevant State and Commonwealth legislation, environmental planning instruments, guidelines, policies, plans and industry codes of practice and including the **NSW Wind Energy Guideline for State Significant Wind Energy Development (2016)**;

• a description of the measures that would be implemented to avoid, mitigate and/or offset residual impacts of the development and the likely effectiveness of these measures, including details of consultation with any affected non-associated landowners in relation to the development of mitigation measures, and any negotiated agreements with these landowners.

• The NSW Wind Energy Guideline then references the Noise Bulletin:

'To ensure an adequate assessment of potential noise impacts, the Department has developed a **Noise Assessment Bulletin**' and notes that the EIS **must include** 'completed technical studies, including an accurate noise impact assessment for relevant dwellings undertaken consistent with the requirements of the Noise Assessment Bulletin'.

• The *Noise Bulletin*, in turn, refers to a South Australian EPA Guideline, as follows:

'The NSW Government has adopted the 2009 South Australian document Wind farms – environmental noise guidelines (SA 2009). SA 2009 will form the basis of the regulatory noise standard and assessment methodology that will apply when SSD wind energy proponents are assessed and determined in NSW. Adopting SA 2009 will facilitate increased regulatory consistency between states and result in consistent standards applying to significant areas of Australia with high quality accessible wind resources.'

The asserted object of the Noise Bulletin was to "ensure acceptable noise levels for people living in the area surrounding a proposed wind energy project" by adopting "clear standards … to accurately predict noise levels at surrounding dwellings."

Since the introduction of the present framework, it would be fair to say that there has been little agreement in relation to standards and predictions. The approval process for the development of wind farms in NSW has in fact been beset with acrimony, community division, discord and distrust. The acousticians charged with noise assessments have divided into two camps – those writing Assessments for developers (Sonus, Marshall Day Acoustics, Resonate, SLR) and those critical of these Assessments (Les Huson, Steven Cooper, Bob Thorne, Professor Colin Hansen). The principals of Marshall Day Acoustics and Sonus Acoustics have come off second best in court proceedings in Victoria and the Administrative Appeals Tribunal.

The reason for the division and the acrimony is clear – the political and developmental consequences of conservative or strict applications of the Guidelines. It was well expressed by Marshall Day Acoustics in its Critique of the 2016 Draft for Consultation -

"Unlike other forms of development, noise criteria can have a direct impact on the viability and productivity of proposed wind energy developments. Seemingly small changes in noise criteria or assessment methods can have a significant impact on the potential renewable energy yield of a site ..."

The submissions which follow are an attempt to alleviate some of the major issues at the heart of the present and ongoing discord. It is well known that significant differences of opinion exist in relation to low frequency sound and infrasound. But there are also specific steps which could be taken and should be taken in relation to noise impact assessments (dBA scale) which would go a long way to alleviating present conflicts if "clear standards" and "accurate predictions" are indeed the object.

- The obligation imposed by the Noise Bulletin on the Department is a mandatory one: "The Department and the EPA will assess the noise assessment report to determine whether it has been undertaken in accordance with the requirements of SA 2009 and this Bulletin, and whether the predicted noise levels comply with the applicable criteria."
- The Guidelines state categorically that the amenity of residents living near wind farms in the state "will be protected by the scrutiny applied by the planning authority when projects are lodged."

The Department's duty to assess the Noise Assessment reports should be considered in light of the recent Victorian Supreme Court decision in *Uren v. Bald Hills Wind Farm* where it was found that noise nuisance (unreasonable interference) could apply even if a wind farm development complied with noise limits imposed through the planning process. Another view of this is that actions for noise nuisance will inevitably be commenced notwithstanding that the Department has approved a wind farm project. Noise nuisance litigation in NSW is inevitable if the deficiencies outlined below are not rectified.

It may be that in order to perform its statutory duty to assess Noise Assessment reports, the Department needs to appoint a neutral and expert acoustician/assessor to determine whether the noise planning framework has been complied with. It is no longer sufficient to avoid the responsibility. The appointment of a Wind Farm Commissioner is widely regarded as having achieved very little.

#### Submissions

## Background Noise – Lack of Independence in the Analysis of background noise data

The collection and interpretation of background noise measurement is one of the most divisive issues confronting planning. Background noise levels are critical to the noise assessment predictions. They are open to manipulation in data collection and to interpretation in terms of the analysis.

Acousticians subcontracted by the proponent make choices in their analysis of the raw data collected from receivers within the wind farm site. They make numerous decisions in their consideration of the data and each of these decisions can make a significant difference to the determined background noise level. These include decisions to include or exclude data and where to place the average lines which are applied through the data.

At the moment, the advice given to all non-associated receivers concerned about noise impacts ruining their lives is that it is essential that they carry out collection of their own background data in accordance with SA 2009. This is because they cannot rely on the proponent's analyses.

There is a straightforward solution to this issue. The data collected by subcontracted acousticians becomes the property of the developer. The solution is to specify that **the developer is required, upon the request of the landowner from whose property raw data has been collected, to provide a copy of that data to the landowner.** Landowners should not be compelled to give access for data measurement without being able to receive a copy of the raw data if they request it. The landowner is then able, if necessary, to provide that data to an acoustician independent of the proponent for analysis. There is no significant cost to the developer as the data already exists and can be easily made available.

An extension of this same process is the solution to resolving audible noise concerns of non-associated residents in proximity to developing wind farms. It is suggested that non-associated receivers whose residence is within 6 kms of a proposed turbine should be able to request and require a background noise collection in accordance with SA 2009 and on the basis that the raw data is made available to them after collection.

#### **Uncertainty of Noise Impacts - Putative Turbine Model and Layout**

All of the output predictions in Noise Assessments are based on a putative turbine model. The traditional rationale has been that there may well be changes in the models and types of turbines available to the developer when it reaches the tendering process associated with pre-construction. It has not been the practice of proponents to then consider the noise impacts of detailed design changes or turbine type. There is generally little or no consideration of a different turbine, layout, site effects, tonality or low frequency noise in the EIS.

This has frustrated impacted communities who perceive that there can be **no certainty** or transparency in relation to any of the noise predictions contained in any given Noise Assessment because the chosen turbine for the project may be entirely different. It has also created the perception that this is yet another way in which proponents are not genuinely accountable for the noise impacts of a wind farms as the Assessment in any given instance may be unrelated to the ultimate project turbine.

It is undoubtedly the case that there are likely to be changes in models and types of turbines available to a developer post-approval. The wind industry is not unique as an industrial developer in facing this position. But it is a fraud on the communities surrounding wind farms if approvals are granted without the developer being required to demonstrate to the satisfaction of the EPA and the Department that **the projected sound levels of the chosen turbine are at or lower than the levels set out in the EIS**. The EIS is **required** to include completed technical studies including an accurate noise assessment. Little wonder communities despair when consideration of matters such as accurate sound power levels and tonality are relegated for consideration (compliance testing only) after approval.

The same reasoning applies to the wind farm *layout* and *turbine placement* – matters directly impacting on potential sound output.

Any windfarm approval must be conditional upon the developer demonstrating to the satisfaction of the Department and the NSW EPA that the sound levels of the chosen turbines in the finalized layout will be at or lower than in the EIS. This condition must be satisfied before construction can commence. It is not a compliance issue. It is a condition of approval.

#### Manipulation of application of Output Predictions - Sound Power Levels

The SA 2009 noise models produce **output predictions** based in part on the sound power levels of the chosen turbine. SA 2009 explicitly states that a **conservative approach** should be used to determine the overall predicted level.

It is well understood by all in the industry that sound output measurements for a particular turbine are carried out on a single turbine under pristine conditions with clean airflow. It is also well understood that in reality, this is not the way the turbine will be operating. There will be "**site effects**" arising because the turbine is not placed on a flat plane and because it is not placed in a location isolated from other turbines. Turbines grouped in a wind farm mean turbulent air and this means a greater sound output. Turbines placed on ridges mean that the topography impacts the wind flow – the wind blowing up the hill and onto the blade increases the sound output. Site effects can alter the sound power plateau which may otherwise occur when wind speed increases and sound power levels can continue to increase rather than plateau.

None of this is new. As Professor Colin Hansen wrote in 2012:

"If you have turbulent inflow, due to terrain or due to an upwind turbine creating turbulence for a turbine that is directly downwind of it, and if you have several of these, the actual noise generated by the turbine is much greater than the noise that is used in the calculations. The noise that is used in the calculations is something the manufacturer provides, which they have measured on a turbine on flat ground and with no turbines upstream."

"...the effect on receiver noise levels of the sound power of the turbines reported by manufacturers not being representative of the actual sound powers generated at a particular site under worst case operating conditions should be required as part of the documentation which would affect the uncertainty of the noise predictions. **Wind farm developers should also be required to submit compliance data from other wind farms in similar terrain that show the difference between predicted and measured noise levels...."** 

Time and time again, notwithstanding that SA 2009 requires a conservative approach, there is no proper consideration of the site effects at a particular wind farm and their impact on predicted sound output levels. In some cases, proponents have failed to obtain all relevant power levels from the manufacturer.

There should be a mandatory penalty of 5dB if all relevant manufacturer's specifications are not available. There should be a mandatory penalty of 2dB if manufacturer's specifications are available but there has been a failure to analyse the necessity of adjustment on the basis of site specific effects.

## Manipulation of SA 2009 input parameters for ground effect (soft v's hard ground) following the South Australian update in 2021 .

SA 2009 (ISBN 978-1-876562-43-9) was updated by the South Australian EPA in November 2021. The ISBN number did not change. This has created a situation where proponents choose those aspects of the input parameters which suit them. The technical requirement of the Noise Bulletin is that the 2009 document is prescribed in NSW – not the document as amended or updated by other jurisdications.

SA 2009 accepts the use of the CONCAWE noise prediction model and ISO9613-2. SA 2009 requires the application of "hard ground" (zero ground factor) as the input parameter for ground effect. In the two recent wind farm developments (Thunderbolt Wind Farm and Winterbourne Wind Farm), soft ground was used by Sonus as the input parameter. **This can typically make a difference of underestimating the sound level by 10dB or higher as there is reduced absorption with hard v's soft ground.** The use of the soft ground input variable is directly contrary to the requirements of SA 2009.

If the Department is prepared to accept the SA amendments of 2021 (which may be reasonable) it must immediately specify that the input parameter for ground effect (G = 0) is to remain unchanged from the 2009 document.

#### **Cumulative effects**

The SEARS require assessment of cumulative impacts. This has become especially relevant with the proliferation of wind farm developments in Renewable Energy Zones. It is quite possible, with the right input parameters, to model the cumulative effects of proximate windfarms. Currently, Noise Assessments are questionable for the variety of reasons outlined. But additionally, there is no serious attempt being made to model cumulative impacts. In the absence of detailed consideration of

cumulative noise impact, a conservative approach must apply appropriate dB penalties for the failure to do so.

#### **Negotiated agreements**

SA 2009 has a section dealing with negotiated agreements with wind farm developers:

'The criteria have been developed to minimise the impact on the amenity of premises that do not have an agreement with wind farm developers. Notwithstanding this, the EPA cannot ignore noise impacts on the basis that an agreement has been made between the developer and the landowner. Developers cannot absolve themselves of their obligations under the EP Act by entering into an agreement with a landowner.

If it is shown that a development is having an 'adverse effect on an amenity value of an area that ... unreasonably interferes with the enjoyment of the area', then appropriate action can be taken under the EP Act.'

This requirement is quite clear and its effect is that there is an obligation on developers to satisfy the planning authority that negotiated agreements deal with noise issues for hosts and non-associated land owners. This requirement is typically dealt with by the developer asserting that there is an agreement in place. This bare assertion does not explain or address how any adverse noise impacts have been addressed.

It is not an answer for the developer to state that Negotiated Agreements are confidential. It is open for identities and commercial information to be protected whilst still requiring the proponent to establish how adverse noise impacts have been addressed. Continuing to accept the developer's blanket assertion that "all is well because we have an agreement" is a breach of the Department's responsibility to assess the project in accordance with all applicable planning requirements.

Negotiated Agreements must demonstrate how adverse noise impacts have been addressed.

#### Tonality

SA 2009 requires that to determine tonality, testing (such as in accordance with IEC61400-11) should be carried out. The planning assessment process adds a 5dB penalty to noise model predictions if there are tonal emissions from the proposed turbine.

Developers frequently assert an absence of tonality in the projected turbine in the absence of accurate manufacturer's test results in accordance with the specification. . Manufacturers should provide test results in accordance with IEC61400. Because the Noise Assessments are not critically, independently evaluated, this breach can be overlooked.

If no test data to determine tonality (such as in accordance with IEC61400-11) are provided and specified by the developer, the 5dB penalty weighting to noise model predictions must be added.

#### Low Frequency Noise

Noise assessments are required to "assess the potential for non-associated residential receiver locations to experience low frequency noise levels exceeding 60 dB(C)."

The problem is that neither ISO9613-2 or CONCAWE calculate sound levels below the 63Hz octave band. With bands below 63Hz missing, it is not possible to obtain an accurate calculation of dB(C) sound levels. To the extent that the Bulletin addresses low frequency noise as a characteristic of wind turbine noise, no accurate assessment method is prescribed.

For the purposes of calculation of dB(C) sound levels, a noise model which is able to calculate sound propogation in one-third octave bands below 63 Hz must be used to supplement octave bands which the prescribed models cannot calculate. The correct ground absorption factor (G=0) must also be applied.

#### **Tonality and Low Frequency Noise Maximum Adjustment**

The Noise Bulletin limits a combined penalty for tonality and low frequency noise to 5 dB(A). There is no rational basis for this as a combination of these characteristics (each of which individually carry a 5 dB penalty) does not limit itself to such a maximum.

There should be no arbitrary maximum adjustment to the addition of penalties for special noise characteristics.

#### Intermediate Locations for LFN and Infrasound

It is indisputable that longer wavelengths travel further and dissipate less readily than the higher frequencies. The majority of acousticians agree that low frequency noise propgates much more easily than high frequency noise, especially during stable atmospheric conditions often found at night with little wind in rural areas. At large distances, the turbine noise spectra are dominated by lower frequencies. To the extent that the noise standards encourage and permit testing of the lower frequencies at intermediate locations instead of at the relevant receptor, these provisions should be removed. It is sufficient that the developer is not required to test inside residences despite widespread knowledge that low frequencies penetrate buildings and may "bounce around" inside.

#### Developments in Low Frequency Sound, Amplitude Modulation and Infrasound

The "swoosh" sound of turbine noise is caused by the increase and decrease of noise as the blades rotate. It is known by acousticians as **Amplitude Modulation** -

Amplitude modulation (AM) of wind farm noise (WFN) is a unique feature known to contribute to annoyance [1], [2], [3] and possibly sleep disturbance [4], [5], [6]. AM in the context of WFN is defined as a periodic variation in

sound pressure level (SPL) at the blade-pass frequency [7], [8], typically between 0.4 and 2 Hz, and is typically most prominent during the evening and night-time when environmental conditions tend to be more favourable for AM [9], [10], [11]. AM is a highly variable phenomenon, depending on meteorological conditions [12], [11], [13], distance from the wind farm and wind farm operating conditions [9], making AM challenging to detect. Subsequently, characterising AM also becomes a challenging task because it depends on the performance of AM detectors.[Dr K Hansen]

Research results in relation to **AM** are beginning to emerge from studies funded by the NHMRC and the Australian Research Council.

Research led by Flinders University studied three wind farms over one year using acoustical and meteorological measurements. It established that:

- AM noise occurs two to five times more often during the night time than the day time.
- AM worsens at sunset and at sunrise.
- AM can be detected for up to 60% of the night time at distances around 1 km from a wind farm and at 50% of residences within 2 km. At greater than 3 km, amplitude modulation continued to occur for up to 30% of the night time.
- Residents living downwind and cross wind were most impacted.
- There was an increase in AM depth in the data recorded indoors.

In addition to the emerging results from the Wind Farm Noise Study, in late 2017, there was fiercely contested litigation in the Commonwealth Administrative Appeals Tribunal involving the Waubra Foundation. Lengthy expert evidence, under oath and subject to cross examination, was given by Mr Christopher Turnbull (Sonus), Dr Bruce Rapley, Dr Robert Thorne, Mr Steven Cooper, and Mr William Huson (Les Huson & Associates) in relation to wind farm sound and infrasound. The findings of the NHMRC literature review, together with a Denmark literature review and Health Canada studies were examined in detail.

The Judgment, delivered by the Deputy President of the Tribunal, decisively concluded:

# "(469) The propositions which are supported by the preponderance of relevant expert opinion, and which we accept on that basis, include the following:

- A significant proportion of the sound emitted by wind turbines is in the lower frequency range, i.e. below 20 Hz;<sup>[358]</sup>
- The dB(A) weighting system is not designed to measure that sound, and is not an appropriate way of measuring it;<sup>[359]</sup>
- The most accurate way of determining the level and type of sound present at a particular location is to measure the sound at that location;
- The best way of accurately measuring WTN at a particular location is through 'raw' unweighted measurements which are not averaged across time and are then subjected to detailed "narrow-band" analysis;
- When it is present, due to its particular characteristics, low frequency noise and infrasound can be greater indoors than outdoors at the same location, and can cause a building to vibrate, resulting in resonance;

- Humans are more sensitive to low frequency sound, and it can therefore cause greater annoyance than higher frequency sound;
- Even if it is not audible, low frequency noise and infrasound may have other effects on the human body, which are not mediated by hearing but also not fully understood. Those effects may include motionsicknesslike symptoms, vertigo, and tinnituslike symptoms. However, the material before us does not include any study which has explored a possible connection between such symptoms and wind turbine emissions in a particular population.<sup>[360]</sup>

These findings are of course consistent with the experience of some residents near the Bodangora Wind Farm in NSW whose houses are developing cracks.

The increasing height of modern turbines does not necessarily give rise to greater dBA noise and if it does, a correct application of the existing planning framework should theoretically deal with this. But the present framework largely ignores the impacts of low frequency noise and infrasound. Larger turbines generally generate more LFN than smaller turbines. Measurements on many types of modern wind turbines show that most sound energy is radiated at low and infrasound frequencies and less at higher frequencies.

Taking into account the increasing turbine size, the ongoing and emerging research in relation to AM, LFN and Infrasound and the glut of windfarms which will cover the rural regions of NSW on the present political agenda, the existing noise framework is no longer sufficient to fulfill its object of providing an adequate assessment of potential noise impacts. It cannot be said with any degree of confidence that the framework will "*ensure acceptable noise levels for people living in the area surrounding a proposed wind energy project.*"

The addition of a requirement that non-associated receivers whose residence is within 6 kms of a proposed turbine should be able to request and require a background noise collection in accordance with SA 2009 with the raw data made available to them after collection would assist to a limited extent only. It may be that Neighbour Agreements with non-associated residents within 6 kilometres of the windfarm should be required as a condition of approval.

Waubra Foundation and Commissioner of Australian Charities and Not-for-profits Commission [2017] AATA 2424 (4 December 2017)

Long-term investigation into wind farm amplitude modulation and annoyance K Hansen, Acoustics 2021.

New Measure of wind turbine night noise <u>https://news.flinders.edu.au/blog/2021/08/19/new-</u> measure-of-wind-turbine-night-noise/

Long Term Quantification and Characterisation of Wind Farm Noise Amplitude Modulation <u>Phuc D. Nguyen</u><sup>a</sup>, <u>Kristy L. Hansen</u><sup>a</sup>, <u>Peter Catcheside</u><sup>b</sup>, <u>Colin</u> <u>H. Hansen</u><sup>c</sup>, <u>Branko Zajamsek</u><sup>b</sup>, <u>Measurement</u>, Volume 182, September 2021 109678

#### Summary of Proposals for Review of Noise Assessment Requirements

- 1. The developer is required, upon the request of the landowner from whose property raw data has been collected, to provide a copy of that data to the landowner. Landowners should not be compelled to give access for data measurement without being able to receive a copy of the raw data if they request it.
- 2. Non-associated receivers whose residence is within 6 kms of a proposed turbine should be able to request and require a background noise collection in accordance with SA 2009 and on the basis that the raw data is made available to them after collection.
- 3. Any windfarm approval must be conditional upon the developer demonstrating to the satisfaction of the Department and the NSW EPA that the sound levels of the chosen turbines in the finalized layout will be at or lower than in the EIS. This condition must be satisfied before construction can commence.
- 4. If the Department is prepared to accept the SA amendments of 2021, it must immediately specify that the input parameter for ground effect (G = 0) is to remain unchanged from the 2009 document.
- 5. In relation to Sound Power Levels, there should be a mandatory penalty of 5dB if all relevant manufacturer's specifications are not available. There should be a mandatory penalty of 2dB if manufacturer's specifications are available but there has been a failure to analyse the necessity of adjustment on the basis of site specific effects.
- 6. The framework requires detailed consideration of cumulative noise impact. In the absence of such consideration and given the proposed proliferation of wind farms in central NSW, a conservative approach requires appropriate dB penalties
- 7. The framework requires that Negotiated Agreements must demonstrate how adverse noise impacts have been addressed. It should be a condition of approval that developers satisfy this obligation.
- If no test data to determine tonality (such as in accordance with IEC61400-11) are provided and specified by the developer, the 5dB penalty weighting to noise model predictions should be added.
- For the purposes of calculation of dB(C) sound levels, a noise model which is able to calculate sound propogation in one-third octave bands below 63 Hz must be used to supplement octave bands which the prescribed models cannot calculate. The correct ground absorption factor (G=0) must also be applied.
- 10. There should be no arbitrary maximum adjustment to the addition of penalties for special noise characteristics.
- 11. To the extent that the noise standards encourage and permit testing of the lower frequencies at intermediate locations instead of at the relevant receptor, these provisions should be removed.
- 12. The framework should be modified to take account of the latest and emerging research into amplitude modulation, low frequency noise and infrasound. The addition of a requirement of Neighbour Agreements with non-associated residents within 6 kilometres of a wind farm should be considered as a condition of approval.

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 27 January 2024 2:22:45 PM
Attachments:	m-k-park-nsw-energy-guidelines-submission.pdf

Submitted on Sat, 27/01/2024 - 14:21

Submitted by: Anonymous

Submitted values are:

#### Submission Type

I am making a personal submission

## Name

First name Michelle

**Last name** Park

I would like my name and personal contact details to remain confidential No

## Info

Email

Suburb/Town & Postcode Bendemeer NSW 2355

**Please provide your view on the project** I object to it

Submission file <u>m-k-park-nsw-energy-guidelines-submission.pdf</u> (52.68 KB)

**Submission** Submission attached for M & K Park thank you

I agree to the above statement

Yes

I write this letter/submission on behalf of myself and my husband in order to register our absolute objection to any and all renewable energy development. We are particularly against the destruction of our beautiful Bendemeer landscape for energy that is not green, not reliable, not 24/7, not cheap and above all is environmentally damaging.

These major industrial developments pushed upon small communities like ours, force us to spend hours, days, weeks doing repeated submissions, letters, emails, reading thousands of pages of government documents, web pages, Scoping Reports, Environmental Impact Statements, in order to try and preserve the beautiful area we LIVE in. We may not have a hospital, doctor, supermarket, dentist or other major town service but this is why we chose to buy and live here. We made a conscious decision to go without certain things in order to have what few others have, peace, quiet and beauty in every direction – those writing these policies either do not understand or care at the damage they are causing to the environment or communities.

Areas of land ie mountain tops that would have remained untouched, as they have always been, are now under threat of destruction from wind towers expected to be as high as 260 metres, close in height to the tallest building in Sydney, at Barangaroo, Crown Sydney, with a blade span of 160 metres. This area is the domain of the Wedge Tail Eagle, they fly daily over our home and will be decimated, as they are being elsewhere, by blades spinning at over 200km/hr and faster. Kangaroos have not learned to avoid cars, birds will unfortunately be unable to avoid these killers as evidenced by the many bird and bat reports these so called "environmentally friendly" energy companies publish. It is a well-known fact properties are not checked regularly, these are on private land where there is no ability to check unlike mining companies who are heavily regulated and monitored.

#### Solar Energy

If it is so cheap, why do power bills continue to rise, government continues to hand out funds to certain people in Australia?

Your policy does NOT ensure development happens where it has few environmental, heritage and land-use constraints. For example the Bendemeer solar industrial project is located 1.2kms from our VILLAGE! It is to be built beside our town water supply, the Macdonald River and situated on hilly NOT flat country. Bendemeer has many visitors for its scenic location in the Moonby Ranges and straddling the beautiful Macdonald River.

Your policies protect Regional Cities of Tamworth, Albury, Armidale, Bathurst, Dubbo, Griffith, Orange, Dubbo and Wagga Wagga but you allow a major industrial development on top of the village of Bendemeer - half a million steel/glass panels, maintenance sheds, substation, security fencing, lighting and will ruins the lives of many people and the local environment.

The Solar Guidelines state the protections for these large towns is to avoid significant conflict with approved residential uses of land and unlikely to have an adverse impact on the regional city's capacity for growth, or scenic quality or landscape character. This protection should be applied across the board to encompass ALL communities. We are small but our inhabitants and landscape are just as important if not more so.

Your guidelines state jobs a plenty come with these projects yet only the 8 Regional Cities are protected as expected to grow? This is the height of hypocrisy to say the least and makes a mockery of your green energy jobs argument, exposing the untruths of the green energy industry.

As background, Bendemeer residents have formally requested information on the "many" jobs to be expected from these major local developments, this information has still not been provided and the Bendemeer Energy Hub did not have a stand at the recent Jobs Expo in Tamworth.

Your guidelines should not allow an industrial project such as Bendemeer solar to proceed by removing top soil plus hundreds of trees, also in an area that feeds into the Macdonald River (information in the EIS)? Where are these environmental and human protections in your guide?

We are a DARK SKY area – the Lowe Observatory was constructed in Bendemeer due to its lack of light pollution. How is it possible that your government will allow not only security lighting etc of this solar project but to be followed by a massive wind development with aviation lighting? This is unacceptable and these issues should be covered in your guidelines. An area should not be ruined, lose all that makes it unique in order to placate those who live in concrete jungles and do not care for the environment as we do.

These is no other solar project we have found in the New England REZ that is located as close to a village as the Bendemeer project ie 1.2kms. Your policy must have in place protections for communities. It is surely common sense that if someone is to build a large shed on private property and it cannot be seen, heard nor does not in anyway impact the quiet enjoyment of a neighbour let alone a whole VILLAGE with hundreds of people, then there can be less grounds for objection.

In Bendemeer we can hear a pin drop, especially at night, yet your guidelines allow this major industrial development that will not only be visually impactful, but the village residents and project neighbours will HEAR this – this is unacceptable and there should be protections for neighbours and villages in your guidelines.

Community and Stakeholder engagement is the ruination of our community with many no longer in contact with others. This is being repeated in community after community, funds are offered as bribes, some accept, others don't, especially those who will be negatively impacted by a major industrial development, as "The Castle" movie, "You can't buy what we have", some things are worth fighting for, like the preservation of a beautiful landscape. Communities are led to believe the power being generated is power to be utilised by their community, which is of course not the case. Rural communities are being torn apart, lives ruined. Our community is already experiencing fatigue due to the onslaught of solar, wind and transmission lines upon our area. This is unacceptable and there is no need to force this unwanted burden on small rural communities. There is nothing wrong with coal and gas and nuclear energy is the only way other countries tried this renewables road. Other countries have neighbours they can plug into, Australia is an island so we cannot. Solar and wind are not 24/7 and we have a right to cheap reliable power - this is how the Western world progressed and dragged millions out of poverty who your government is plunging back in with this madness and high power prices. If energy consumption is reducing it is only due to cost. The local retirement village residents suffer in the heat and the cold, afraid to turn on the air-conditioning.

#### Site Selection

A project should not even be accepted in the first instance if it does not meet the site selection criteria ie flat land, no visual or noise impact, far from another HOME or VILLAGE, unable to proceed without clearing of trees, habitat, near water source especially a town's water supply.

#### Visual Amenity

1, 2, 3 and 4 – a project should not be allowed to proceed at all when it blatantly goes against all these principles which the Bendemeer project does.

#### Hazards

We are a bushfire prone area – the solar site itself experienced a bushfire last year and we had one of the largest fire on record that closed the pass over the Moonby Ranges for approximately 5 days or more in 2019.

It should not be allowed for an industrial project to be located on top of a residential area. The battery alone for the Bendemeer project will cover approximately 8 acres – this is unacceptable. There have been many fires in these batteries and this one is on top of our village. The entire village will be evacuated due to the health risks if this project catches fire. This should be a clear consideration in your guidelines.

#### WIND

## BIODIVERSITY; VISUAL IMPACTS; NOISE IMPACTS; HAZARDS; AVIATION SAFETY; **CUMULATIVE IMPACT**

Massive, ugly, inefficient, rare mineral and energy intensive foreign built, bird killing, environmentally destructive, human soul-destroying monoliths.

The siting of these disgusting creations on top of our village that will impact the visual amenity both day and night of country people is a travesty.

Hundreds of trees removed, mountains carved out, more roads, widened roads, aviation lighting, light flicker, infrasound and sound in general for those of us who have taken the time to experience the sickening thumping noise that emanates from these things when they are working.

AGAIN, NO CONSIDERATION by government in these guidelines for the severe and devastating impact massive industrial solar, wind and transmission line infrastructure will have on our community and beautiful country area.

Other structures are unable to be built ie a house/shed that shades my neighbour's home, ruins their peace and quite and property value yet these monstrosities ruin everything for everyone except the couple of landholders who have agreed to them.

Bendemeer is up against the trifecta of all three - where in your guidelines is the protection for our community? The 8 Regional Cities receive protection, but Bendemeer is up against the total ruination of its landscape, peace and tranquillity. This is unfair, unjust, unwanted!

Bendemeer will also bear the brunt of all other projects in surrounding areas to our North and East as we are the ONLY way for these projects to be transported.

77 wind turbines for Bendemeer alone would require at the least 385 truck movements from the Port of Newcastle, after they have been shipped across the oceans for thousand of miles. That is one truck per blade (3) and maybe two per turbine – of course it will entail hundreds more. Where is the green in all this? An environmental solution is nuclear energy and yes, we are happy to have it installed on our property rather have the entire countryside ruined. Energy should have a SMALL FOOTPRINT – this is progress, not the blanketing of New England, which is burdened with approx. 3 times the energy of the other REZs.

The Net Zero Australia report states 100,000 square kilometres of land is needed to be covered in these industrial projects to meet net zero. This is a travesty and will do absolutely nothing to change the temperature of anything except us.

Michelle Park

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 27 January 2024 2:44:04 PM

Submitted on Sat, 27/01/2024 - 14:43

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

## Name

First name Charles

Last name KOEBEL

I would like my name and personal contact details to remain confidential No

## Info

Email

Suburb/Town & Postcode Walcha

**Please provide your view on the project** I object to it

#### Submission

I would like to object to the whole proposed guidelines of Wind Turbines in the Walcha area for the following reasons.

There is no social license except for a very few landholders that will benefit from hosting turbines. The Walcha Council certainly is not a representative of the feeling of the community. Private surveys have indicated this. The Council refuses to do one as they do not want to face up to community concerns.

Walcha is a very small community which does not have the resources to construct what is proposed to be built. The traffic congestion on our roads will greatly affect business eg transporting livestock to slaughter as there is a tight time frame once livestock leave the farm. Children going to school will be affected and emergency evacuation due to health retrieval. Due to turbines aerial retrieval will be very limited in inclement weather.

Walcha is a very productive grazing area where sheep and cattle are produced on improved pasture. A large proportion of the production is semi intensive which includes regular pasture renovation and the application of fertilizer and weed control. Some of this is and has to be carried out by air. Contrary to what is being promoted this in some cases will be impossible and in others to a unsatisfactory standard. Seasonal conditions often promotes a lot of spring pasture growth which dries off due to hot summer days. This creates very dangerous fire conditions . The control of fires in high smoke conditions ( which fires create) will make aerial fire fighting due to the turbines near impossible, very dangerous and not effective. This is exacerbated by adjoining State Forests.

Those proposing these wind turbines developments and solar farms should take a step back as I am sure "the forest cannot be seen for the trees". The whole renewable energy plan without nuclear energy will take at least two decades to build. What happens then is the early built turbines, solar panels and batteries will be at the end of their lives. This means that it will be a continuous build and decommissioning. This is a very selfish and wasteful use of resources. The whole decommissioning program is next to non existent at the moment.

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 27 January 2024 4:58:22 PM
Attachments:	land-assessment-doc.2.pdf

Submitted on Sat, 27/01/2024 - 16:52

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am submitting on behalf of my organisation

## Name

**First name** John

Last name Peatfield

I would like my name and personal contact details to remain confidential No

## Info

Email

**Suburb/Town & Postcode** URALLA

**Please provide your view on the project** I object to it

Submission file land-assessment-doc.2.pdf (232.47 KB)

**Submission** Please see pdf file in submission file "Land Assessment Doc2.pdf as above

I agree to the above statement Yes

-----Original Message-----From: peatfield@bigpond.com Sent: Friday, January 26, 2024 9:14 PM Subject: Fw:

-----Original Message-----From: John Peatfield Sent: Friday, January 26, 2024 7:52 PM To: John Peatfield

Dear Matt

In response to the Draft Energy guidelines I submit a response specifically related to land and soil assessments. It is of vital importance to protect our food and fibre resource Currently the assessment benchmarks involve BSAL and LSC grading systems Firstly —-The BSAL system relates more to cropping and is in principle satisfactory Secondly —- The LSC system is COMPLETELY UNSUITABLE for assessment of Important Grazing land. It is heavily biased towards cropping. Grazing land can really only expect a grading of 4 which attracts only a "moderate " scrutiny.

Food and fibre production can be broadly divided into two categories A.CROPPING—

Grain, horticulture, orcharding and Cotton Production

B.GRAZING--

Meat and Wool Production

C.MIXED FARMING AND GRAZING

NEW ENGLAND is a Grazing district, universally recognised as being one of the most productive and favoured grazing districts( beef, lamb and wool )in Australia by virtue of its soil, climate and topography. There is virtually zero cropping for direct food production.

So the LSC grading is not relevant in assessing the productive value of soils.

The relative quality of grazing land per se should be based on PRODUCTIVITY in terms of DRY SHEEP EQUIVALENT (DSE) which is the traditional universal barometer used by agents and graziers to value grazing land in a productivity sense ie. DSE /Hectare\*. Soil testing as such is completely irrelevant. It is productivity that is important, which is a product of soil fertility, rainfall and pasture improvement.

\*1 DSE is the amount of feed required to support a non lactating Adult Merino Sheep and is extrapolated as below Breeding Ewe—— 1.5 DSE Breeding Cow ——15 DSE Non breeding cow/ steer— 10 DSE

#### NEW ENGLAND GRAZING LAND

, AVERAGES. 8 to 10 DSE( some lower areas on parts of western side) Better areas with Basalt soil types carry 15 DSE Highly pasture improved areas can reach 20 DSE

I propose a new, simple ,more relevant and equitable assessment scale for grazing land.

This scale could be easily formulated in consultation with local agronomists but, in my opinion, any land over 7 DSE/ Ha should receive a high level of scrutiny

Land with a DSE rating of 14 to 20 should be a no go zone

#### CROPPING AND MIXED FARMING LAND

Again, we need a simple grading system based on PRODUCTIVITY (KG of produce per Ha per year) Regards Dr John Peatfield Deputy Chairman RED4NE

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 27 January 2024 5:33:19 PM
Attachments:	nsw-government-planning-department.docx

Submitted on Sat, 27/01/2024 - 17:06

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

## Name

First name Penny

Last name greig

I would like my name and personal contact details to remain confidential No

## Info

Email

**Suburb/Town & Postcode** WALCHA

**Please provide your view on the project** I object to it

Submission file <u>nsw-government-planning-department.docx</u> (11.68 KB)

#### Submission

1. I ask that the GPD adhere to Social Licence regarding the communities' submissions during this exhibition time.

2.Concern of impact of windfarm developments around Walcha district on prime agricultural land. Fauna and flora (bird and bat) damage to Oxley River National Park world heritage listed area, without at least a 10 kilometre buffer.

3. Aviation safety during agricultural procedures (spreading fertiliser, seed etc) fighting bushfires. Transporting ill or injured people following farm or car accidents will impacted greatly by turbines.

4. Turbine noise and nightlight from turbines do not seem to be addressed adequately.

5.. The impact and disruption to Walch's tourism and local roads for up to 20 years or more.

I agree to the above statement Yes

#### NSW Government Planning Department

I would like to present my submission of objection during exhibition time

- 1. I ask that the GPD adhere to Social licence regarding the communitie's submissions during this exhibition time.
- 2. Concern of impact of windfarm developments around Walcha area on prime agricultural land. Fauna and flora (BIRD AND BAT) damage to Oxley Rivers National Park world heritage listed area, without at least a 10 kilometre buffer.
- 3. Aviation safety during agricultural procedures (spreading fertiliser, seed etc) fighting bushfires. Transporting ill or injured people following car or farm accidents will be impacted greatly by turbines.
- 4. Decommissioning of windfarms. Who is responsible? Developers should have a written commitment or bond.
- 5. Turbine noise and nightlights from turbines do not seem to be addressed.
- 6. The impact and disruption to Walcha's tourism and local roads of up 20 years or more.

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 27 January 2024 7:23:37 PM
Attachments:	submission-dept-of-planning_0.docx

Submitted on Sat, 27/01/2024 - 19:22

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

### Name

First name irving

Last name greig

I would like my name and personal contact details to remain confidential No

## Info

Email

**Suburb/Town & Postcode** WALCHA 2354

**Please provide your view on the project** I am just providing comments

Submission file submission-dept-of-planning\_0.docx (11.56 KB)

#### Submission

I wish to make a submission re. the planning process re. windfarms. My knowledge with the planning process is limited to my observations of the actions of the developer of the proposed windfarms surrounding the township of Walcha & the apparent deficiencies in their planning. We have lately been presented with proposals for massive projects in the surrounding areas with apparently little thought given to the details required to bring these projects to fruition or to communicate with the community the effects of these projects on the area. I can only assume that these issues may be widespread throughout the State & not be isolated to our local area, leaving small communities extremely vulnerable to Developers aims. It is extremely important that Developers follow a well thought out

process that considers the local communities, the fauna & flora, materials required for the projects, local roads etc. etc.. None of these issues seem to have been addressed properly in the locally proposed projects and I can assume perhaps that this situation is not just local. The Developer claims to have Social Licence however is unable to define what Social Licence is. The Developer refused to attend a community day to discuss the pros & cons of the projects, held their own "Information Day" and refused to answer questions, yet claims that the community is suitably informed and on side. Surely a capable Developer should be able to produce an EIS that explains the project satisfactorily without obtaining numerous extensions. Surely the Guidelines should demand that Developers prepare their EIS in accordance with the SEARS & not allow half baked propositions that need numerous corrections & further detail, in the hope that things will progress without scrutiny. Twenty eight days does not give the communities enough time to examine a document of many thousand pages. Decommissioning is one of the biggest issues to be addressed. Why is there no provision for a bond to cover this cost? Without a bond there is no guarantee that decommissioning will be carried out properly. Waste management is another issue not covered satisfactorily the guidelines. I feel these & many other issues look after the Developer and not the small communities that are so important to our country & way of life. Better Guidelines must produce better Developers. Thank you for the opportunity to make a submission.

Irving Greig 51W Legge St Walcha NSW 2354

I agree to the above statement Yes I wish to make a submission re. the planning process re. windfarms. My knowledge with the planning process is limited to my observations of the actions of the developer of the proposed windfarms surrounding the township of Walcha & the apparent deficiencies in their planning. We have lately been presented with proposals for massive projects in the surrounding areas with apparently little thought given to the details required to bring these projects to fruition or to communicate with the community the effects of these projects on the area. I can only assume that these issues may be widespread throughout the State & not be isolated to our local area, leaving small communities extremely vulnerable to Developers aims. It is extremely important that Developers follow a well thought out process that considers the local communities, the fauna & flora, materials required for the projects, local roads etc. etc..None of these issues seem to have been addressed properly in the locally proposed projects and I can assume perhaps that this situation is not just local. The Developer claims to have Social Licence however is unable to define what Social Licence is. The Developer refused to attend a community day to discuss the pros & cons of the projects, held their own "Information Day" and refused to answer questions, yet claims that the community is suitably informed and on side. Surely a capable Developer should be able to produce an EIS that explains the project satisfactorily without obtaining numerous extensions. Surely the Guidelines should demand that Developers prepare their EIS in accordance with the SEARS & not allow half baked propositions that need numerous corrections & further detail, in the hope that things will progress without scrutiny. Twenty eight days does not give the communities enough time to examine a document of many thousand pages. Decommissioning is one of the biggest issues to be addressed. Why is there no provision for a bond to cover this cost? Without a bond there is no guarantee that decommissioning will be carried out properly. Waste management is another issue not covered satisfactorily the guidelines. I feel these & many other issues look after the Developer and not the small communities that are so important to our country & way of life. Better Guidelines must produce better Developers. Thank you for the opportunity to make a submission.

Irving Greig 51W Legge St Walcha NSW 2354

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 27 January 2024 7:26:24 PM

Submitted on Sat, 27/01/2024 - 19:25

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

## Name

First name Kimberley

Last name Cameron

I would like my name and personal contact details to remain confidential No

## Info

Email

Suburb/Town & Postcode 2354

**Please provide your view on the project** I object to it

#### Submission

Submission regarding the Renewable Energy Draft Guidelines

I strongly object to the renewable energy draft guidelines for the following reasons Not enough has been done to protect the community and Energy Co and Renewable projects are stream rolling the community with little concern for its constituents or the environment. Energy Co and developers have a "tick box" approach – call consultation "telling people what will be happening on their privately owned land without any allowance for input." Chris Bowen's plan lacked any kind of human approach it threatens to ruin our community on the basis that it "saves the planet." This infrastructure is not green and it is unreliable – it will leave an irreversible blight on our skylines. The costs of infrastructure is astronomical, unreliable, tax payer subsidised and foreign owned. The government needs to start over by doing proper planning and consultation with other options for energy production on the table- eg nuclear.

The engagement from Energy Co and developers with the community has been appalling -

often just a letter stapled to the front gate or in the mailbox – notifying landholders of massive and invasive projects coming through and devaluing their property. The labelling of our area as a "Rez" alone was not done with community consultation. The whole project has absolutely lacked strategic land planning, and has a huge risk of cumulative impacts. With the traffic on the road and access to our larger towns for health care to name a few. Our community and us personally will be dramatically impacted by the Rez. The New England area is not suitable for a Rez and large-scale transmission and wind factories, these are densely populated and prime agricultural land. No social license has been obtained. It is clear those working for energy co haven't spent much time out of the city and are completely out of touch. With improving technologies of larger turbines – it could be more efficient and more positively welcomed from more remote communities where they aren't so densely populated and the terrain more easily navigated? The information provided in the draft guidelines are outdated with the introduction of newer

technologies. The community needs to be involved from earlier stages. We - the people who will be living with this ugly, enormous infrastructure should be aware of bushfire, flood, soil, visual, traffic, aviation, social impact, and decommissioning/ rehabilitation assessment. Where is a detailed assessment of this? Why are landholders having to find out this information for you and fight for the environment- shouldn't our government be looking after regional communities' best interests – not just its inner-city constituents and foreign owned companies?. For these, and many other reasons – energy co has 'shot itself in the foot' and already has community contempt for it and the renewable energy industry. Rez and its projects have absolutely divided our beautiful community- and this is before any of it has even been constructed – imagine what is to come. Many of the wind factories planning etc has been quite secretive - so members of the community don't know where many of the planning / development stages are up to. If they don't have the green light to go ahead and land holders in this region don't want to sign up to projects – why the enormous amounts of transmission lines and energy hubs? An enormous blight on our beautiful region.

If towns get 10km buffers – so should homesteads. Why are people on properties outside of town neighbouring these projects and transmission – treated like second class citizens? Not to mention provisions for regional cities should be extended to regional towns. Why is the capacity to grow, the scenic quality and the landscape character any less valuable to regional towns than regional cities?

The exhibition period of 28 days is laughable for a hard-working community to read and respond to EIS's which are thousands of pages long. We shouldn't be rushing these projects and their transmission – do it once – do it well – do it properly.

Compulsory acquisition of land – is a menacing threat and completely inappropriate. Wind Factories should not be considered critical infrastructure – this is a dangerous loophole - they are unreliable, enormous, imposing, shed BPA plastics all over the landscape. If you will not have them in suburban Sydney – get them out of our backyards.

There needs to be realistic and industry informed consideration of impacts to aerial operators, including agriculture, firefighting, rescue and retrieval, and general aviation.. The government should be protecting Australians – not enabling cowboy, foreign developers to come in and ruin our proud and beautiful communities. This whole project is "Un-Australian" – you need to go back to the drawing board on energy policy and renewables.

Impacts to the environment I live in and love should not be "offset." Why can't we plan better and see reason that we should be protecting each region for its own merit. I plead with the government to not forget where your food and fibre comes from – don't bite the hand that feeds you. I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 27 January 2024 7:49:54 PM

Submitted on Sat, 27/01/2024 - 19:49

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

## Name

**First name** Alexander (Sandy)

Last name Cameron

I would like my name and personal contact details to remain confidential No

## Info

Email

**Suburb/Town & Postcode** Walcha 2354

**Please provide your view on the project** I object to it

#### Submission

I am writing to express my deep concern regarding the complete disregard for social license by developers and energy companies in NSW. It is evident that the current approach to energy development projects is lacking the necessary consideration for community consent, leaving residents feeling powerless and voiceless in decisions that directly impact their lives and surroundings.

One particular issue that exacerbates the problem is the short period of time given to residents to respond to Environmental Impact Statements (EIS). The complexity and technical nature of these documents, combined with the limited timeframe for review, make it exceptionally difficult for community members to provide meaningful input and raise concerns. This further undermines the principles of social license and reinforces the perception that the views and interests of the community are being disregarded.

As a resident of the New England REZ zone (Walcha), I have witnessed firsthand the detrimental effects of this disregard for social license. Communities are being run over by developers and energy companies who prioritize their own interests over the well-being and wishes of the people they are meant to serve. This not only undermines the trust between communities and developers but also perpetuates a sense of exclusion and disenfranchisement among residents.

To address this pressing issue, urgent action is needed to rectify the current situation and ensure that social license is given the utmost importance in all energy development projects in NSW. I propose the following measures to be immediately implemented:

1. Mandatory Social License Assessment: Introduce a mandatory social license assessment as part of the approval process for energy development projects. This assessment should evaluate the level of community support and engagement, as well as the efforts made by developers to address community concerns and mitigate potential negative impacts.

2. Enforceable Community Consent: Establish enforceable mechanisms to ensure that community consent is obtained before any energy development project can proceed. This can be achieved through legally binding agreements or community referendums, giving residents the power to decide whether a project aligns with their interests and values.

3. Strengthen Community Engagement: Implement robust and inclusive community engagement processes that go beyond mere consultation. Developers and energy companies should be required to actively engage with local communities, listen to their concerns, and incorporate their feedback into project plans. This will foster a sense of ownership and ensure that projects are designed in a way that respects the needs and aspirations of the affected communities.

4. Accountability and Transparency: Establish clear mechanisms for holding developers and energy companies accountable for their actions. This includes transparent reporting on community engagement efforts, project progress, and compliance with social license requirements. Non-compliance should result in significant penalties to deter future disregard for social license.

5. Independent Oversight: Establish an independent oversight body to monitor and evaluate the social license aspects of energy development projects. This body should have the authority to conduct investigations, mediate disputes, and make recommendations for improvement. Its mandate should include ensuring that the concerns and rights of local communities are adequately addressed.

By implementing these measures, we can restore the balance of power and ensure that social license becomes a fundamental pillar of energy development in NSW. It is essential to acknowledge that the well-being and consent of communities should never be sacrificed for the sake of short-term economic gains.

In addition to the concerns regarding social license, it is crucial to highlight the environmental and economic implications of the current energy infrastructure in NSW. The infrastructure being developed is not green and fails to align with sustainable energy practices. This means that instead of contributing to a cleaner, greener and secure future, it will leave an irreversible blight on our skylines and an unreliable power supply.

Moreover, the costs associated with this infrastructure are astronomical, and the reliability is questionable at best. The burden of financing these projects falls heavily on the taxpayers, as they are heavily subsidized by public funds. This not only puts a strain on the

economy but also raises questions about the fairness and efficiency of such investments.

Furthermore, it is concerning to note that a significant portion of these infrastructure projects are foreign-owned. This raises questions about the control and ownership of our energy resources and the potential implications for national security and sovereignty. It is essential to prioritize locally owned and operated energy solutions to ensure that the benefits remain within our communities and contribute to the overall well-being of our nation.

In light of these concerns, it is imperative that we reevaluate the current approach to energy infrastructure development in NSW. We must prioritise sustainable and locally owned solutions that align with our environmental goals, are economically viable, and ensure the well-being of our communities.

Thank you for your attention to these critical issues.

Thank you for your attention to this matter.

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Saturday, 27 January 2024 8:17:09 PM

Submitted on Sat, 27/01/2024 - 20:16

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

**First name** Eleanor

Last name Cook

I would like my name and personal contact details to remain confidential Yes

# Info

Email

**Suburb/Town & Postcode** Coolah

**Please provide your view on the project** I object to it

#### Submission

This infrastructure rollout has not duly considered the impacts to the community, the scenic value and cumulative impacts changing the rural landscape and lacks reasonable consultation planning. Most other development would go through a planning process which incorporates environmental architecture the aesthetics ;along with impacts on neighbours etc . Why has there not been a virtual representation on what our regions look like. The accountability of the embodied energy to produce these short lived renewables so far away from where the energy in needed the enormous energy losses as the power is transported ; the carbon foot print of the production and transportation of this infrastructure will unlikely to equate to reduced emissions ,

#### I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 28 January 2024 1:30:05 PM

Submitted on Sun, 28/01/2024 - 13:29

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

**First name** Katherine

Last name Mackaway

I would like my name and personal contact details to remain confidential No

### Info

Email

**Suburb/Town & Postcode** Walcha 2354

**Please provide your view on the project** I object to it

#### Submission

I have numerous concerns/points of opposition regarding the draft energy framework: • First and foremost is the complete lack of regard for protection of prime agricultural land and the necessity of primary producers to be able to work at industry best practice to provide food and fiber for a growing global population for generations to come. Urbanisation and industrialisation have already captured thousands of hectares of arable land in Australia, it is time to protect what we have left. Transmission lines, wind turbines and solar farms MUST be placed on land that is not agriculturally productive. Placing them in the New England not only takes up valuable land but it also puts into jeopardy our ability to use aerial agriculture practices and to fight fire. They destroy our ability to best produce globally essential products.

• I would question the direction of Australian State and Federal governments with regards to renewable energy.. Countries around the world that have had renewable energy infrastructure for many years are now replacing it with more efficient coal powered

stations and nuclear-powered stations. Instead of repeating the mistakes of other countries why don't our governments pursue a direct line to nuclear powered stations. Australia is renowned for the minerals required to run these plants and indeed we export them so that other countries can make use of them. In a global community why are we not looking at long term efficient power production. Even if we are to continue down the renewable path – consideration must be given to how we provide power when the sun isn't shining, and the winds are calm.

• Small regional communities are being torn apart by the lack of consistent information being provided to them with regards to renewables development. Developers trading in confidential contracts, proponents with no construction experience and government bodies sacrificing regional environments to appease voters who are not prepared to install renewables within their own vision. Regional people deserve better.

• Little consideration has been given to the cumulative impact the construction required for the REZ's will place on regional (even global) resources. Much of what is required is not recyclable and many precious metals required are being mined in countries without Australia's level of care. The protection of the global environment is paramount and is indeed the reason for seeking alternatives. The 1st world governments must be mindful that their desire to please their idealistic voters does not actually cloud the science and research available at the cost of 3rd world countries environmental destruction. Resources that can be found closer to home also need to be considered. For the last 15 years obtaining gravel for regional roads in our area has been near impossible. If all the gravel needed for the foundations of the wind towers and transmission lines is taken from regional areas, we will not be able to transport our goods to feed, clothe and shelter the planet into the future. • Regional communities have a right to be provided with a list of all possible projects and their validity. Walcha community members were shocked when the draft transmission lines were published. The main reason for this shock was the proposed "South Hub". This hub was placed in an area of our LGA that had no support from landholders for hosting wind turbines or solar panels. There was absolutely no need for transmission lines or a hub when there was no support for development. This Hub has been taken off this stage of the transmission development plans but we still worry for our future. All levels of governments should be more open to landholders as to what is happening in their area. There is a very real fear of capital acquisition and how this may affect our futures and the future of agriculture in our district. We have a right to security to continue our business without penalty.

• The impact on transport routes has not been adequately addressed by any level of government. It is not enough to state that it is the proponent's responsibility to ensure they have upgraded roads to provide them with adequate access to their development site. Regional producers should be guaranteed right of way, at any time on any section of the road, where they require to transport their produce. Especially if that produce is livestock. K. Mackaway

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 28 January 2024 2:27:00 PM

Submitted on Sun, 28/01/2024 - 14:26

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name Damien

**Last name** Timbs

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Walcha

**Please provide your view on the project** I object to it

#### Submission

Firstly I support the voice for walcha community group submission, and the red4ne submission.

I would like to see developer accreditation based on experience and asset backing to ensure that contract accumulators are taken from the industry. We would then see a developer that has experience and financial capability to build rez projects (particularly wind farms) worth billions of dollars consider people and place before proposing a project.

With early engagement from a developer that understands cost of build and social licence are paramount to project success a community can then be presented and have input into an accurate EIS that will go through the planning system more smoothly. This is good for the whole industry ( planning, developers, land holders and community) With accredited developers there should also be project time lines. I'd like to see 2years from sears to responses to EIS submissions before the project expires forcing the developer to move on or start again.

We need decommissioning bonds. The calculator is confusing to the point I would say inaccurate and gives little security to communities or landholders. It should include rehabilitation of below ground infrastructure in the case of wind and solar projects.

A cumulative impact assessment should be done to ensure small towns with limited access and resources are not disproportionately burdened with large scale renewable projects. For example a town like walcha 3000 people, one road in and out of town with limited water housing gravel and people may be able to handle 200megawatts of wind not 4000megawatts as is proposed. By having this study done early certainly can be given to government developers and community. Community capital (resilience) needs to be protected not destroyed!!

EIS should be factual complete and accurate. If they are error ridden and face many objections ( community and agency) they should be thrown out. A community cannot be used to respond in 35 days to an EIS that is prepared by experts to then have the proponent go away and change their liquid document over the course of years. If a community cannot asses the economic social and environmental impacts of a project by the time the EIS is put on exhibition then it is non compliant and should be thrown out.

I thank you for the opportunity to submit and am only more than happy to follow up with any further information if required

Kind regards Damien Timbs

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 28 January 2024 3:12:34 PM

Submitted on Sun, 28/01/2024 - 15:12

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name James

Last name Young

I would like my name and personal contact details to remain confidential No

### Info

Email

Suburb/Town & Postcode Walcha 2354

**Please provide your view on the project** I object to it

#### Submission

With regard to wind energy projects destined for the Walcha district and specifically Winterbourne and Ruby Hills Wind Farms.

These projects have been proposed with a total lack of consultation with the community at large and hidden agendas. Winterbourne Wind Farm was originally going to be approximately fifty towers, now it is one hundred and nineteen.

This whole process should have been driven by our locally elected representatives in consultation with the community, working out the energy source and size of projects that the community thought acceptable. Then the council would keep the community informed of developments.

As the situation stands at the moment for Winterbourne there are very few human health considerations, environmental considerations, visual amenity considerations, no decommissioning considerations, not to mention the disruption and inconvenience of the huge number of traffic movements required to construct the development. These projects

are an absolute disaster for small rural communities. They are very badly managed and just a money grab by developers eager to get their grubby foreign hands on the hard earned tax payers money that is given to them as incentives and subsidies by the government.

The large number of transmission lines required to service these monstrous power projects have the same affect on the community as the generators. Destruction of native habitat, fire generating and social upheaval.

Its pretty hard to imagine that our government would willingly impose so much division and disruption on their fellow Australians. When good planning and consultation could easily have resolved the whole situation.

#### I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 28 January 2024 3:15:41 PM

Submitted on Sun, 28/01/2024 - 15:15

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name Greg

Last name Piper

I would like my name and personal contact details to remain confidential No

### Info

Email

**Suburb/Town & Postcode** Coolah

**Please provide your view on the project** I support it

#### Submission

Thank you for the opportunity to make a submission.

with regards to the Benefit- sharing Guidelines:

my experience with the Liverpool Range Windfarm ( a CCC member) and a host landholder for the Valley of the Winds wind farm. I would make the following points. All involve Warrumbungle LGA.

Community involvement in the development of these agreements has been completely absent due to councils refusal to have any community representation at any meetings with developers. They say that they are following guidelines?

The guidelines for LGA need to be more specific to unsure community involvement. At the momement councils would like all funds to be administered by council, where and when the like. The funds are to be for the benefit of the impacted communities not the total LGA.

With regard to the Developer

State and federal Governments need to require some evidence that the developer is a good corporate citizen! Will they be paying tax in this country, what is their corporate structure, is it set up to pay no tax in Australia

The Guide lines for Energy co seem to be different to other developers

there seems to be no compensation for neighbours affected visually by its construction Regards Greg Piper

The developer needs more flexibility in how if delivers community benefits

#### I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 28 January 2024 3:50:03 PM
Attachments:	20240128-draft-energy-guidelines-submission-rachel-greig.pdf

Submitted on Sun, 28/01/2024 - 15:48

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

### Name

First name Rachel

Last name Greig

I would like my name and personal contact details to remain confidential No

### Info

Email

**Suburb/Town & Postcode** Walcha 2354

**Please provide your view on the project** I object to it

Submission file 20240128-draft-energy-guidelines-submission-rachel-greig.pdf (36.19 KB)

**Submission** I have attached my submission.

I agree to the above statement Yes

Rachel Greig Walcha, NSW 2354 28<sup>th</sup> January, 2024

I appreciate the opportunity to make a submission on the draft energy guidelines displayed by the Department of Planning. I note that I have already been involved in a meeting with Mathew Riley and understand the issues we raised at the Armidale meeting (via zoom with Red4NE and EnergyCo) will be included in the consideration of the guidelines. I would also like to endorse the written submissions by Red4NE and Voice for Walcha. I support all the points that were raised in these submissions.

The importance of a much higher level of scrutiny, including Community feedback, at scoping stage can not be stressed enough. This protects communities and allows for well-designed projects only to enter the planning process. It facilitates faster approval for projects because they are likely to have community support. Clogging the system with poorly devised projects causes delays, anxiety and destruction of communities.

Likewise, accreditation of project originators would help prevent developers treating communities and the Planning Department with contempt. Poorly delivered, unfinished, misleading EIS's should not be accepted, particularly by developer flippers who have no concern for the long-term success of the project or the well-being of the community.

Rather than duplicating these issues, I would like to focus on the lack of protection for native flora and fauna, particularly the areas adjacent to National Parks and Heritage areas. While wind energy may be important for climate change mitigation, it should not be at the expense of degradation of biodiversity through the loss of habitat and the death and displacement of native fauna. I advocate for a 10km buffer around National Parks, World Heritage and Wilderness areas.

It is a common theme that our community keeps repeating. We need well designed projects, appropriately sized and in appropriate locations, undertaken by responsible licensed developers. This does not include industrial wind projects in the vicinity of our protected National Parks, World Heritage areas and Wilderness areas.

Bird and bat principles in the draft wind guidelines states that turbines should be situated 100m from blade tip to nearest canopy. This is obscenely close to a National Park where our fauna is supposed to be protected. How can industrial activity on the very edge of National Parks not result in loss of biodiversity? Developers currently target sites adjacent to National Parks, so they only have to get approval from one government agency, not multiple landowners. The fact that wind projects only have to be 100m from National Parks exacerbates this problem. Instead of discouraging development in these biodiversity sensitive areas, the Planning Department will be facilitating it.

There are irreplaceable biodiversity corridors extending from National Parks and heritage areas – important connections between high value habitat and National Parks that are vital for native animals. They serve as habitat for endangered species as well as vital refuge areas during bushfires. Often bushfires can only be countered at the edge of National Parks, and these biodiversity corridors are the only safe haven, serving as refuge as well as areas where repopulation of National Parks can occur.

In our local example of the Winterbourne Wind Project, on the edge of the Oxley Wild Rivers National Park, the developers are targeting the ridgelines where the native habitat is still intact. This would be typical for any wind development where the developers are targeting the higher altitude ridgelines. This is often the only uncleared area in private properties that have been cleared over the years for grazing and farming. It is the only remaining remnant native vegetation and biodiversity corridors. For this reason alone, it does not make sense to have windfarms adjacent to National Parks. Have a look on google earth at the vegetation around National Parks – the remaining native vegetation on private properties will be corridors along the ridgelines and this vital biodiversity will be lost with the development of windfarms.

It has been shown that birds are displaced from their home ranges for 5km by turbines. This is supported by a report published by the journal Biological Conservation. It says that wind energy is crucial for climate change mitigation but it also accelerates the degradation of biodiversity through habitat loss and the displacement of wildlife.

The construction of wide roads required for wind turbine delivery as well as laydown areas and the wind turbines themselves can not be achieved without the loss of significant endangered ecological communities adjacent to National Parks. These, like all biodiversity loss, can not be replaced with biodiversity offsets.

While any number of mitigation measures can be written into an EIS, where projects are too close to National Parks, particularly if they are in the catchment area of rivers flowing through National Parks, there is always the risk of contamination, erosion and run-off. There is also the risk of introduction of invasive species – flora and fauna. This is one of the greatest risks to National Parks.

Development of wind projects adjacent to National Parks will interfere with aerial operations, including fire fighting and rescue and retrieval. Bushfires are often impossible to contain within the National Parks and are fought on the boundaries. Wind turbines in the vicinity are going to preclude aerial firefighting which is often vital in containing blazes and protecting life and property. Likewise, low level flying for search and rescue operations are going to be severely impeded by the presence of wind turbines. It also impacts tourism and scenic flights in the area.

If the planning department is genuine about protecting biodiversity as well as facilitating well designed projects that are going to pass through the approval process with social license, appropriate siting of projects at origination is vital. This includes having projects appropriately separated from our highest value biodiversity. There are plenty of appropriate locations for wind projects – adjacent to National Parks is not one of them.

World Heritage areas and Wilderness areas are particularly sensitive areas that should be protected. We have made a commitment to protect UNESCO listed World Heritage areas. There is no guarantee of protection if we are allowing and even encouraging industrial development on the boundaries of these irreplaceable areas. Wilderness areas, as described by NSW National Parks and Wildlife Service, "are large, natural areas of land which, together with their native plant and animal communities, remain essentially unchanged by modern human activity." Surely it is not appropriate to have industrial projects adjacent to wilderness areas. Wind projects should not be visible or audible from wilderness areas. A buffer of 10km would help mitigate this.

National Parks resources should not be wasted on the assessment of DAs for wind projects. A 10km buffer around National Parks would mean National Parks and Wildlife staff could be looking after our parks and educating the public rather than reading biodiversity impact assessments for Wind Projects.

As a community at the coal face of this transition, we need to see that this is not a blind race to net zero. We can not have communities and biodiversity sacrificed along the way. With appropriately located projects, this does not have to be the case. Please don't allow these guidelines to be a means for developments to be progressed simply through the planning department. They need to be a way for communities and nature to be protected as well.

Regards Rachel Greig

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 28 January 2024 7:04:25 PM

Submitted on Sun, 28/01/2024 - 19:04

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name Anna

Last name Young

I would like my name and personal contact details to remain confidential No

### Info

Email

**Suburb/Town & Postcode** WALCHA 2354

**Please provide your view on the project** I object to it

#### Submission

My name is Anna Young and I have serious concerns about the Draft Energy Framework that the planning department has released.

Firstly, I am significantly concerned about the influence of developers on this framework. Take for instance that on the 16th of November the New England REZ was clearly described as Less suitable for projects before it was re-rated to "suitable" after developers influenced politicians. How can it change over night? How can we trust the planning department if they are this willing to change their guidelines based on pressure from developers of all people (who of course have a vested interest in these guidelines). Where is their integrity.

Secondly there is no clear decommissioning bond discussed that will protect landholders or communities. How can the planning department leave this up to good will. Why are renewable developments not required to have this bond as other developments are.

Thirdly, how is it that current projects that are "still in the pipeline" are not being included as needing to be subjected to these rules? Winterbourne is still in process of approval and seeing as it will be around for many years (reportedly at least 20) surely it should also be subject to meeting these guidelines/ requirements. This also speaks to ongoing issues not addressed in regards to social license. Social license should be absolutely clearly defined and be quantifiable.

These guidelines and the roll out of information to date give very little faith in the planning department and need to have greater scrutiny.

I endorse the written submissions by voice for walcha and Red4NE.

Kind regards,

Anna

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 28 January 2024 7:12:15 PM

Submitted on Sun, 28/01/2024 - 19:12

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

**First name** GROSVENOR

Last name FRANCIS

I would like my name and personal contact details to remain confidential No

### Info

Email

Suburb/Town & Postcode Dunedoo

**Please provide your view on the project** I object to it

#### Submission

Thankyou for the opportunity to object to the proposed guidelines.

Guidelines should provide clear minimum setback distances to neighbours property boundary ,neighbours homes and workplaces ,villages,towns and cities.

Landowner consent is imperative for development both on the to be developed property and for neighbouring lands if development is to occur within the minimum setback distances.

With no consent needed ie if ministerial determination of cssi the involved landholders will have no negotiating power with developers at all which will create a situation of absolutely no social licence, this is fundamentally un australian another erosion of land rights.

Windfarms should in no way be concidered Critical state significant infrastucture as they are not state owned and by their nature no single windfarm in its own right is critical

infastructure.

The declaration of renewable energy zones should also be subject to local community acceptance and not just imposed upon them, their success is ultimately dependant upon social licence being obtained.

Investigation into the side effects of development should have firstly been prioritised before guidelines are set. It seems to me that these guidelines are being set to enable development rather than ensure that development is a good thing. Extensive research into both the negative consequences and positive outcomes must be established and continually assessed .

Paul Francis

I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 28 January 2024 7:13:12 PM

Submitted on Sun, 28/01/2024 - 19:13

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Peter

Last name Young

I would like my name and personal contact details to remain confidential No

# Info

Email pyoung.glencollin@hotmail.com

**Suburb/Town & Postcode** WALCHA 2354

**Please provide your view on the project** I object to it

#### Submission

I have significant concerns about the draft energy policy frameowork that need addressing and rectifying.

How is it that this policy still fails to address social license with a clear, quantifiable definition. Social license has repeatedly been reported as a factor to be considered in whether a project will proceed or not. Being noted that they will not proceed without social licence. However, with the ongoing vagueness of this statement developers are able to get around this just stating that they have it (even in instances such as Walcha where independent surveys have shown they clearly do not have social license for Winterbourne Wind Development).

The policy is also flawed where it talks about a scenario where a CSSI can be determined. In sites where communities are significantly against projects and the areas have previously been deemed not suitable for wind developments how do we ensure that overly ambitious developers aren't causing harm to the community? I would like to see the policy also ensuring that there is project licensing and developer accreditations being mandatory. We need accreditation processes in place to ensure there is not harmful behaviour to communities and to the renewable industries. Kind regards, Peter Young

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 28 January 2024 8:30:16 PM

Submitted on Sun, 28/01/2024 - 20:30

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

**First name** Stan

Last name Moore

I would like my name and personal contact details to remain confidential No

### Info

Email

**Suburb/Town & Postcode** Gundary NSW 2580

**Please provide your view on the project** I am just providing comments

#### Submission

The draft guidelines are deficient with regards to decommissioning, remediation and rehabilitation responsibilities.

My comments should apply to all large scale developments, wind, solar and battery. As a precautionary principle, the applicant/developer should be solely responsible for decommissioning, remediation and rehabilitation of the site. This responsibility would be transferable to a new owner/operator.

In order to ensure this will (not may) be undertaken, the applicant/developer should be required to lodge a security bond with the government an amount that is initially and then regularly assessed to cover the actual/assessed cost of decommissioning, remediation and rehabilitation of the site.

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Sunday, 28 January 2024 10:10:15 PM

Submitted on Sun, 28/01/2024 - 22:10

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name George

Last name Papadopoulos

I would like my name and personal contact details to remain confidential No

### Info

Email

**Suburb/Town & Postcode** Kellys Plains NSW 2350

**Please provide your view on the project** I object to it

#### Submission

I am writing to object to the finalisation of the current wind energy guideline.

In general the document lacks a tight prescriptive approach and leaves much open to interpretation. the word "should" rather than "must" appear as often as each other. For example, the noise limits frequently include "should", rather than "must". It isn't that clear how many times per year a wind development may be allowed to exceed noise limits. At which point therefore can a wind development go ahead if it will predictably on occasion exceed noise requirements?

Likewise on visual impacts the guidelines in section 5.1.1. say: "Projects should be designed to avoid visually dominant turbines and shadow flicker of more than 30 hours per year". Saying "should" rather "must" is again a concern. But then why is it OK for a residence to endure, potentially up to two month of shadow flicker per year, even if it were

for only 30 minutes every morning or evening? Say this where to occur around the summer solstice where the sun remains in relatively similar position from November to January (or winter solstice). Clearly the authors of the document have discounted the severity of the problem if favour of the developer!

There is much that can be said about the logic and the science of the requirements. I point out a few examples to demonstrate this. Firstly, the 50dBA limit on noise in national parks from wind turbines. The general background noise in quiet rural areas is usually less than 20dBA on quiet still days, particularly on winter nights (data collected personally and also evident in the Winterbourne wind development submission). Wind turbines will be operational even when ground wind speeds are still, as upper air current are frequently strong regardless. The proposed 50dBA limit will allow wind developers to noise pollute pristine national parks with noise levels up to TEN TIMES the background noise level. This proposed limit is ridiculous to say the least, utterly negligent to say the worst.

Likewise the 35dBA limit for surrounding residences is likewise a figure plucked out of thin air for Australian conditions. Perhaps it might be more relevant to some of the noisy European agrarian environments where significant volumes of highway traffic persists well after midnight. Whereas in the New England area, there is hardly any movement of any vehicles during sleep hours.

Lastly, I am highly concerned about section 2.6 granting the minister the right to declare wind developments as SSI and CSSI (again the criteria is open to interpretation about what storage means). Wind developments will never contribute more than a few percent to the national grid. Yet, at the local level they will consume ten of thousands of hectares, rendering the area displeasing to many and probably hostile to many forms of wildlife. Justifying these as critical infrastructure is to indulge the most significant wastage of land resources that could have ever been imagined in the history of humans.

In summary, the wind guidelines are highly wanting as they do not protect national parks, wildlife, farm animals or humans from excessive and intrusive noise; the interpretation of the guidelines is loose and appears to favour the developers.

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 11:04:45 PM

Submitted on Mon, 29/01/2024 - 23:00

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name Kate

Last name Bowman

I would like my name and personal contact details to remain confidential No

### Info

Email

**Suburb/Town & Postcode** Merotherie 2844

**Please provide your view on the project** I object to it

#### Submission

I object to the transmission lines, the wind turbines and the solar farms all proposed in the Birriwa area in the Central West Orana Renewable Energy Zone (CWO REZ).

The compulsory acquisition of the land for the transmission lines is unfair and cruel. How can the government justify taking people's land who have lived and worked for generations just because they have a criteria to meet with renewable energy. The transmission line is proposed to be on land that has been in my family since the 1800's – 7 generations of one family. Now part of that prime agricultural land is proposed to used to hold the transmission line. The owner of the land was bullied into giving it up by the use of compulsory acquisition. The way energy co and all the other companies that are coming to speak to landholders is mindboggling. This district did not choose to be deemed a REZ, someone sitting in a big office put a pin on a map and decided. It is a disgrace how this whole situation has been handled and we as a community have been railroaded into

accepting it. We are only a small community, and there are a lot of people within the community that have no idea about the planning and instigating that is going on. Energy Co are only speaking to a very small minority of the community and when they do speak to us, they cannot answer any of our questions.

There are so many other reasons why I object to this project, but again there is very little consultation and time to review the reading material and give specific reasons why to object. After all the objections I have already put in, I feel we are still not being listened to or heard.

I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 11:15:19 PM

Submitted on Mon, 29/01/2024 - 23:15

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Rebecca

Last name Tobin

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Gundagai 2722

**Please provide your view on the project** I object to it

#### Submission

I welcome the opportunity to comment on the Draft Transmission Guideline (Guideline). It's critical to get NSW transmission planning correct given the Draft Transmission Guideline says 4,000 kilometres of new transmission lines is required in NSW, as we transition to net zero emissions, over the next two decades.

However, the Draft Transmission Guideline is disappointing as it fails to recognise the significant benefits of undergrounding transmission, as follows:

Eliminates the risk of overhead lines causing bushfire; Eliminates hazards to air and ground bushfire control; Eliminates the risk of interruption to power transmission in severe weather events and/or bushfires and therefore improves transmission security and resilience as required under the SLACIP Act; Minimal impact to private or public land after construction is complete;

No overhead lines impeding agricultural operations, machinery use, irrigation, or aircraft operation;

No visual impact from overhead transmission lines;

No corona effect noise impacts that occur with overhead transmission lines;

Less transmission losses with HVDC underground cables;

No electromagnetic field impacts; and

A much-reduced easement size with undergrounding, with the possibility to horizontal directional drill sections, and therefore considerably lower biodiversity impacts.

#### **BUSHFIRE RISK**

Living the nightmare that was the Dunn's Rd Fire, it highlighted the reality that we can't fight fires in the vicinity of transmission lines, RFS stipulates this. Proponents say they work 'hand in glove' with the RFS, we know from experience and the fire ground that this is NOT the case.

Your reference to 'transmission lines can be quickly shut down for safety reasons' within this draft guideline is misguided and incorrect, particularly when Proponents have told us directly that to shut down is a very long process requiring ground access, and they wouldn't shut down. We have also heard from Proponents themselves (in our case Transgrid), that 'turning off the lines during a fire' is NOT an option due to risks for end users, they have also mentioned 'de-energising the lines' and when questioned about 'whether de-energising the lines presents a risk to Human Life, as the lines are still 'live' due to residual energy and energy transfer where lines parallel', the Proponent Transgrid collectively replied 'YES it still is a risk', this therefore is not a safe suggestion, we should not be exposing firefighting personnel to more unnecessary risk, when undergrounding eliminates this risk. Experienced personnel from the fire grounds of the Dunn's Rd Fire, stated during the Parliamentary Inquiry, that the lines were NOT turned off during active firefighting, and requests to do so were denied.

Adding more High Voltage Power Lines exposes us all, bushfire prone communities and all those impacted in all new transmission paths to an even greater level of risk that can only be described as negligent, and deeming our communities undefendable. There will be an increased risk to human life in every fire for the next 80 years of the overhead lines lifetime. I ask, how can we put firefighters, volunteers, families, communities, people at further risk, when the risks are already so high. There is no acceptable risk when it comes to potential loss of human life, when we have the ability to eliminate the risk by undergrounding.

Further on Bushfire, the inputs in relation to the potential impact and management of Bushfires within this guideline draft is disingenuous and not reflective of the 'reality'. This has been a highly contentious issue with New Transmission projects, and there is no alleviation of community concerns and opposition only grows as a result. It is negligent to put people and communities at further risk when the risks are already so high. Our Bushfire Prone communities are fearful of the next fire, ever present in the recalled accounts and experiences voiced in the Parliamentary Inquiry in reference to the Dunn's Rd Fire, from family members, volunteer firefighters, incident controllers, and Brigade Captains. Accounts where the 330kV lines impeded the ability for RFS to control the fire before it exploded to devastate our communities, witnessing arcing behaviours of the 330kV line that drove home how dangerous these structures can be and the threat to human life they pose. The proposal for HumeLink 500kV overhead and those like it, has us even more fearful of what is to come in the next fire event, making swathes of areas undefendable, and further risking lives, property and animals. It devastatingly appears as though Government and Proponents care not for the imposing of greater fire risk they are bringing to people and communities, or the impediment and risk new transmission projects

have on safe fire control. This guideline is not a reflection of the 'reality' of what has occurred during fires, and ignores pleas from people that will be burdened with the threat for the next 50-80 years. References made to so-called stringent 'vegetation management programs', in our own 40 years experience of a 330kV easement on our property, the 40 vears of debris left to bank up as fire fuel load, and the neglect in maintaining current easements gives us little hope, faith, or confidence in their words. 40 years of evidence of not maintaining these easements can not be replaced by promises to do better. The only confidence method for us and our communities is to put this infrastructure underground and there will not be the need to rely on empty promises by Proponents and their contractors, or the extra expense on the consumer to fund ill carried out maintenance programs for the next 50-80 years. We are the ones that will be responding to any fires that occur in and around the easements, as volunteer firefighters, we community members will be expected to fight fires that result during construction, operation, and those who will be risking our lives. Undergrounding via HVDC has our lives valued and considered, and protected long into the future, an ever mindful solution to avoiding generational impact on families of volunteer firefighters and their children.

A HVDC underground solution will simply not leave lasting impacts, and leaves our regional communities in a seemingly 'untouched' state without the ominous burden of overhead infrastructure that will have a lasting impact on communities - social, environmental, economic and liveability impacts, impacts that will see substantial loss. Undergrounding is a viable solution, it is a socially conscious, ethical, safer, more environmentally geared, sustainable and I would have thought 'more Australian', in the hope that we leave no one at the detriment of an overhead option.

A recent poll by the Guardian said that 70 per cent of people believed the transition to net zero shouldn't be at the expense of communities and the environment. Also 65 per cent of people were against overhead transmission lines. It is important to take the opinions of the people of Australia into account when developing a Transmission Guideline. Overhead transmission lines cause enormous harm to communities and the environment and must carefully planned.

In the Transmission Guideline, we urge you to have:

-Undergrounding as the default when looking at transmission options in NSW; and -All the costs (all first round direct and indirect costs, including costs to communities and the environment) of transmission options included early on in the planning stages of transmission projects – in the cost-benefit analysis of AEMO's Integrated System Plan and in the RIT-T undertaken by Transgrid. Including all costs when assessing transmission options is essential to achieving efficient outcomes in the national electricity market.

Costs to consumers and the wider community that result in the event of a fire, or severe weather events, are not considered. Due to exposure in fire and severe weather, overhead assets are damaged and outages occur. The extent of damage to networks as a result of extensive fires, like the Black Summer Fires, costs consumers and community. Not only do the costs need to be accounted for damage to overhead infrastructure but also the costs associated with loss of network and outages, as these costs are inflicted on consumers, businesses and end users. Consider further the financial costs of loss of network and consider these costs for future climatic and fire events, ever mindful that over the overhead infrastructure's lifetime damage will likely occur many times over, and each time resulting in further costs to consumers. Based on this itself, to have a resilient network and grid we should not be adding in more high voltage overhead transmission to be exposed to climatic events and be at the mercy of potential damage when it can be placed underground to safeguard and protect the infrastructure, and not cost consumers and communities. This in itself has undergrounding as the most feasible option for the future, investing in infrastructure that is protected underground and not exposed to climatic elements.

Engineers are telling us that there have been major advances in underground cabling technology, it is entirely feasible and the world is looking on in disbelief as Australia builds more overhead transmission lines, and as an example of the feasibility of a HVDC comparison, as per an independent review by Amplitude Consultants into costings for Humelink, experts have calculated that Humelink will cost 1.5 times the cost of the overhead option put forth by proponent Transgrid.

Governments overseas have come to the conclusion, that when you take into account all the environmental costs of overhead transmission lines, undergrounding is the least-cost long run option. And communities have said to Government and Proponents alike, if you go Underground, you can start tomorrow, Undergrounding has community acceptance and is the solution for us all.

Millions of dollars will be required to repair overhead infrastructure in EVERY fire, every severe weather event over the lifetime of the asset. Further still, liability claims will no doubt come into play if these New Transmission Projects are responsible for starting a fire, impedes control of a fire, or a life is taken by or as a result of the infrastructure, which begs the question who takes responsibility? Proponent /Government /Consumers? To avoid all of this extra cost and risk, to not only people, communities and environments, but also the infrastructure itself, Underground is the only way forward. We should want to be proud of the infrastructure we put in place to safeguard our electricity network into the future, something that the next generation can marvel at, rather than gasp at massive archaic overhead infrastructure.

Our safety, our people, our homes, our communities and our environment, 'Our Australia' should come first. We should be investing now for not only us, but the legacy we leave the next generation, our legacy should see New Transmission Projects Underground.

With a Select Committee Inquiry underway, of which was formed after the Parliamentary Inquiry due to only half the committee supporting the findings, you refer only to this Parliamentary Inquiry in your Draft Guideline. It should be expected that the guidelines you put forth should also represent the findings of this new inquiry with a report due End of March 2024, and not doing so is a fatal flaw in process. Undergrounding has not been dismissed when a Select Committee Inquiry is still ongoing into this very issue.

Regards,

Rebecca Tobin

I agree to the above statement Yes

From:	<u>B White</u>
To:	DPE Energy and Resources Policy Mailbox
Subject:	Draft Energy Review
Date:	Monday, 29 January 2024 1:59:18 AM
Attachments:	2024 01 22 response to Guidelines.pdf

DPIE Please find attachedresponse to the on the draft NSW Energy Planning Guideline . Beth White

Whitelands Ben Lomond NSW 2365 29/01/2024

Preface to the Response to the Draft NSW energy Planning Guidelines Document (Nov 2023)

In its role to comply with the governments' quests to bring forth the rapid implementations of renewable energy systems, undue haste has allowed systemic failure across the entire process.

I understand that Public Servants are served with targets and expectations, however the resultant hastily construed plans are a blight on the department that calls itself "Planning".

From the concept of mapping a Renewable Energy Zone, on which every sector has failed to consult; across failure to consider and adapt for trends in new technology and subsequent implications for site selection; failure to pre-plan a need to transmit the generated electricity; it is just a debacle! How do we purposefully comment on that?

-Response to the draft NSW Energy Planning Guidelines.

"People bear the social cost ...

Big corporations make money...

A new era of energy poverty oozes across an unprepared nation...

and there comes a point where people cannot even afford the basics!"

### **Observations**

We note within communities, within local districts, within regions every single one can relate to the cases of Destruction of Families, because of dealings with Energy Generation Works' (EGW's) the scouts and the proponents.

Families are core to social structures, so projecting forward we imply degeneration of sectors of communities and the demise of rural society. That is catastrophic when built on the pretence of the supposed "greater good."

In our case the big corporations are big overseas corporations interested to collect handsome subsidies, to embrace projects with a view to profit from the quick "on sell" referred to in the industry ...to 'flip' a project. Regional people bearing the social cost, fail to even benefit from a reliable, cost effective electricity supply guarantee, flippantly reassured that all of the energy generated is destined for the city to keep their lights, systems and climate control mechanisms operating.

There are to be community benefits which are so disproportionate that they are akin to 'the trinkets' for which First Fleet personnel traded the Australian nation.

### Site Selection

There is neither approved protocol, mode of operation, prescribed introduction nor code of conduct for project scouts. Nothing that could ensure responsible accurate point of contact, trustworthiness or even traceability of the processes. This must be corrected.

What makes a more densely populated area appropriate for selection as a preferred EGW selection is unimaginable.

Areas of high quality land allows for a smaller "liveable area." Productivity in the case of livestock is described by the LLS in terms of DSE (dry sheep equivalent) or of the Net Primary Productivity (NPP – a figure measured in Kg/Ha).

Comparative data analysis should be described in these terms.

Primary production is either consumed in Australia or forms part of Australia's GDP. What motivates or gives authority to any government entity to undermine the components of independence and national standard of living?

Where productivity is high, the population density can be greater and the networks of roads, rail, telecommunication and transmission are in greater supply to meet the need. That is not to say that there is any logic in the proposed intent to reverse the flow of energy transmission on existing structures. Why then even consider those transmission lines when initially drawing a line around a REZ?

### Transparency of the contract and Representation.

Before contracts, surveys should be undertaken, to include the Whole Community. There must be proof of community engagement (not a mere opportunity to ask questions or be 'informed') but Individual by Individual person, asked and a record of their position/ attitude kept. i.e. record of individual engagement. The record should be kept of

- 1. who is contacted and in agreement with the project concept in principle,
- 2. contacted NOT in agreement with the project concept in principle
- 3. who would accept the project in their community and on their land or their neighbours land.
- 4. who would NOT accept the project in their community and on their land or their neighbours land.
- 5. who is undecided.
- 6. a record-of a majority who are willing for the venture to proceed within the vicinity of their community must be known before it be allowed to proceed to be listed for the purposes of a REZ.

The information must be shared within the area of interest:- the information to be transferred with all agreements, property sales, purchases, transfers, lease, legal transactions, investments; and be accessible to the public unimpeded.

<u>SAMPLE:-</u>It is pleasing to see that a template of a contractual agreement included in the Guidelines. A part of the problem is the absence of openness by proponents, to entities unaccustomed to the size, scale and persistence of scouts for the projects.

### Receptor

Language used in terms of the "receptor #" is dehumanising and therefore unacceptable.The wording must be changed to be framed in terms of an accurate description of the element – residence/ wool shed /stock yards/ workshop/office/quarters etc.

<u>Response times</u>. -Why is it necessary to set guideline strategies in place that surreptitiously favour proponents and penalise communities?

Case in point was the rapid withdrawal of mapping on the first instance of the release of the mapping in the document. A whimper from proponents who were thrown into confusion and a change was wrought immediately. Incompetency? Threat? Blunder? There is an immediate need to remove the bias towards proponents and establish some equity in the Capacity for community to participate/respond i.e. deadlines in terms of funded research and time allocated.

The period of time allowed for response to cumulative impact has not changed since 2021 – even though information is much more complex. Independent, professional, technical reviews and assessments are subsequently more complex – it cannot be expected that communities just rely on past practices. Communities must be allocated provision for funding and appropriate time constraints for independent, complex, professional, technical review and assessments.

Independent technical assessment is essential as a significant means to guard against operational corrupt practices. That assessment process therefore must be formulated on our community's terms, as a guard against corrupted operations and performance indicators.

This requirement applies to funding the capacity to independent professional research as applied to:-

- i. market valuation
- ii. soil
- iii. noise
- iv. water
- v. air quality
- vi. aerial services
- vii. BDAR
- viii. ACHAR
- ix. cumulative impact assessment
- x. any other report specific to a particular development

In effect we propose that the period for proponent response and period for the community response - be equivalent in time and that the community be funded to an appropriate allocation for necessary professional assessments.

Landscape and Visual Impacts

The term "Visual Impact" has been softened by adjusted the wording which now reads "scenic quality" – "Visual Impact" has been dumbed down in reference to "Scenic Quality" No! It's Visual Impact - in our workplace and our residence. It should be referred to as such.

All reference points in the review documentation are indicated on flat land p26 -A tower on hills / surrounding landscape / new generation turbines and in reference to transmission lines must be taken into account in assessment for both noise and visuals on different terrain. Attention must be given for accurate representation of hilly terrain with gullies and outcrops. A Photomontage must accurately reflect terrain in proportion and be true to the angle of vision.

Photomontage assessments should use current landscape imagery, i.e. within 2 years of reproduction.

Distances must be represented on a sliding scale that accommodates changing technology. No guidelines such as the South Australian setbacks is adequate unless it has a sliding scale incorporating figures representative of height / distance / capacity / type of mechanisation / quality of glass etc.

It must be based on scientific evidence and acceptability by a community.

### <u>Noise</u>

The NSW stated level of tolerance is 35dB – THAT IT IS on top of the record of background noise is misrepresented by proponents. The impact across humanity is diverse / there are those who are genetically predisposed to sensitivity. In part it can be dependent on the psychology of an ability to control, versus the psychology of the uncontrollable.

Humans can seek avoidance strategies. There is a psychological impact on human lives but un-researched is the impact on livestock which becomes reflected in our business and therefore our right to protection of our commercial use and ultimately our viability.

Likewise - not researched but therefore ignored as unknown are the impacts on wildlife:-

- i. of scent,
- ii. sound
- iii. visual signals for food source, breeding cycles and survival within the habitat.
- iv. as applicable to BDAR.

We estimate that for humanity, it may be acceptable to have 5% of days on which there is a significant impact upon our noise tolerance. Therefore it follows that it looks to be acceptable when there are 95% of days on which there is NOT a significant impact on a person at their home (not just in it) AND at their workplace.

Such sound tolerance should replace mere decibel regulations which cannot accommodate site specific circumstances and predominant seasonal patterns.

Regional Cities iSEPPs exclude smaller regional communities and as such are inequitable.

Regional communities are hubs that on one hand have no protection but on the other hand are to very essence of predicted growth.

Given the area of exclusion for infrastructure, no one is yet able to answer how close then can the "Regional City" expand and develop towards any approved infrastructure? To whose regulatory framework does that fall?

### Commercial Use-

While there is no understanding of farming practice within either the NSW Planning Dept or Energy Co- you both must be brought to an understanding that our properties are commercial businesses as recognised by the Taxation Department.

The farm/our business/ workplaces must be recognised for their commercial use. As such our farm businesses are entities that are entitled to a safeguard guarantee and an assurance that our commercial use is protected.

### Rehabilitation - a Component of Decommissioning

The figures discussed in regard to decommissioning are unbelievably wide ranging. The figures cannot possibly be presented without also presenting in detail, the assumptions on which they are based and examples with full explanatory detail.

Waste management cannot be oversimplified given that from our local experience items that one would suppose to be recyclable are not. This being i.e. packaging contaminated with oils and greases. Individual blades do not necessarily last for even 10 years so the plan for their recycling is critical. They are already a problem. There is no plan for recycling blades and the only acceptable policy is to prescribe that materials must be returned to their country of manufacture.

### Bird and Bat Impact Assessment

Given the importance of protecting the presence, habitat and breeding cycles of migratory species, it is imperative that there is a tolerance of 25km from any internationally recognised RAMSAR site and by local agreements in other sensitive jurisdictions.

The avian aspect of wind and solar infrastructure is effectively ignored with the potential for species counts, injury and deaths amounting to removal without either trace or record. Reportedly potential hosts proceed to undertake disgraceful, elimination practices thereby pre-empting accountability to biodiversity monitoring and regulations, self-serving their

monetary returns, guaranteed without hindrance. Recognition of a broad area for exclusion may hinder some such bad practise.

### Aerial activity.

In the case of fires it is very clear that modern firefighting has an aerial orientation. Properties, regions and districts with turbine and transmission infrastructure are excluded from receiving effective aerial firefighting techniques.

Aerial agriculture is utilised to spray for weed management and fertiliser spreading. Modern farmers utilise drones to conduct livestock inspection and fence/ boundary surveillance. None of these can proceed in turbine infested land. Scouts offer a proposal to turn off the blades from spinning but regardless, operators will not fly in the presence of this infrastructure.

Turbine infrastructure and panels impede long standing traditional agricultural practices and interfere with implementation of innovative modern ideas.

### Transport Access

Rural and regional residents have to tolerate the absence of public transport and depend entirely on the road network to access our market place - critical to our businesses. In our business an opportunity delayed is an opportunity forfeited. No opposing business venture should have authority to override our right to market access. There is no plethora of alternate routes from which to choose. The outcome of the cumulative impact is ill considered and potentially catastrophic to rural business.

We also depend entirely on road networks to acquire rural and domestic supplies, seek education, access to medical services, requirements of employment, social and cultural opportunities.

There is no other option.

The threat of obstructions along our route of access is catastrophic to families and business functions.

Regards,

**B.White** 

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 7:48:10 AM

Submitted on Mon, 29/01/2024 - 07:47

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Louise

Last name Clarke

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** YARROWITCH

**Please provide your view on the project** I object to it

#### Submission

National Parks and Wilderness areas need protection. The Journal of Biological Conservation has recently published research that windfarms accelerate the degradation of biodiversity through habitat loss and displacement of wildlife. The Walcha area is one of the unique wilderness and national parks that would lose biodiversity.

The landscape would be scarred by the industrial scale of wind farms proposed to the region.

The community is not in agreement with the proposed wind farms. Only a small percentage of the community is in favour and they are generally those that are benefitting from the farms financially.

Walcha is a small community that relies on emergency service such as westpac helicopter and RFDS in emergencies. It often suffers from low lying fog and the turbines will restrict the ability of emergency services to land in the community.

### I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 7:56:01 AM

Submitted on Mon, 29/01/2024 - 07:55

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Malcolm

Last name Rouse

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2843

**Please provide your view on the project** I am just providing comments

#### Submission

C W Rez.

Our district will change from a farming area to an industrial area. This is an imposition that we never wanted. Doesn't help when you keep telling us how great it's going to be.. We will see over 90 turbines from our front verandah, we are offered nothing. We have neighbours that see hardly any but will collect 100's of thousands of dollars per year. We did have a tightly held community, now it's fractured.

How about compensating the community with more than tokens.

#### I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 9:18:33 AM

Submitted on Mon, 29/01/2024 - 09:18

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name SALLY

Last name GILDER

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Glencoe

**Please provide your view on the project** I object to it

#### Submission

All scouts/proponents should be accredited.

Social license must be defined.

Prime Agricultural Land must be defined and referenced with productivity not scenic quality.

Cumulative mapping of the whole region must be published in local and national media every time a SEARS is lodged.

A decommissioning bond of \$500,000 per tower must be lodged before any construction has commenced.

Community consultation should include an acknowledgement from every non associated home and business within an 8km range of any tower, and the word "receptor" should be omitted.

Wind towers should not be located within 2km of neighbouring land, 3km from neighbouring residences.

Noise standards and infrasound impacts should be reviewed in line with the larger wind turbines currently being installed

### I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 9:25:45 AM

Submitted on Mon, 29/01/2024 - 09:25

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name Annette

Last name Piper

I would like my name and personal contact details to remain confidential No

### Info

Email

**Suburb/Town & Postcode** Coolah NSW 2843

**Please provide your view on the project** I object to it

#### Submission

Whilst the multiple draft guidelines are on the right path to protecting the residents and communities from profit driven and usually foreign owned developers, there are still more protections needed.

Proponents have proved that they will do the minimum to get their projects through and need to be closely monitored, as such more detail needs to be added to the guide to ensure proponents consider, consult, negotiate and compromise with residents and communities and not be allowed what, in the CWO REZ, feels like a free for all (but not for the residents).

I am pleased to see the Private Agreement Guide refers to the recommendations by the AEIC and a template is provided. This should go a long way to protecting hosts and it should be a requirement to proponent to give this document to EVERY potential host.

Here are some of my particular concerns

Draft Wind Guidelines set -

\*I would like a minimum 6km setback from non-associated residences. 2km is not far enough as a "sensitive receiver" with the height of the turbines. 2km was the setback in 2011 when turbines were 1/3 the height. The sliding scale (Figure 7 in Section 4) for the Scoping Report requirements should be applied as a set back scale.

\* All towns, regardless of size, should be afforded a 10km setback, not just the bigger towns of Mudgee, Dubbo etc.

\* As a resident of the REZ I was never asked if I was willing to live in a "modern day power station". The Guidelines MUST protect residents in REZs from overdevelopment from multiple projects and turning primarily rural areas into industrial ones.

\* Locals should be involved in the process of determining landscape character. This can't be trusted to a developer/proponent.

\* While the government says infrasound and low frequency noise is not a danger, studies have shown up to 30% of the population is sensitive to it. The government is basing their recommendations on older data with smaller less powerful turbines. Infrasound and low frequency sound should be monitored at residences, after turbines are operational to ensure residents are safe.

\* The aerial firefighting justifications referred to in the guideline, based purely on recommendations made by AFAC, are not sufficient. The case study was of a small fire (around 50ha) that was lit deliberately by the fire captain with prior notice to the wind project operators who had staff on site. There were around 40 turbines that were only 150m high. The fire was not the type that would normally require aerial firefighting support. In a large fire of thousands of hectares, high levels of smoke, and hundreds of wind turbines averaging 250m high will make aerial firefighting hazardous and quite rightly impossible, taking away this protection from multiple areas and endangering the local population.

\* Bird/bat mortality figures are always understated compared to real life data. In a REZ situation this could result in extinction of some species over time. Turbines need to be placed further away (up to 5km) from some species such as owls, raptors etc.

\* The decommissioning requirements are insufficient to protect communities. Secure bonds need to be put in place prior to project commencement.

\* A more pro-active approach needs to be taken by the proponent regarding dealing with the old turbine blades - this is going to be a problem in the future if not planned for now.

\* I totally disagree with wind projects being able to be classed as Critical State Significant Infrastructure. Absolutely NO projects (given that proponents are profit driven companies) should be able to go on private land without the landowner's prior agreement.

Draft Transmission Guidelines -

\*As someone currently under compulsory acquisition I am appalled that this can be enforced on to an unwilling landowner. The compensation guidelines are inadequate for an easement with no end date, property value reductions and restrictions on my farming operations. Compulsory Acquisition cannot be allowed by ANY private company, no matter if they are sanctioned by the government. Compulsory Acquisition should have an option of purchase of the section or lot rather than an easement. An easement should have an end date eg. 50 years, 75 years etc.

\*Decommissioning needs to be considered, whilst transmission infrastructure is long lasting it will not last forever and one day will have to be removed.

\*I have concerns about the levels of EMFs. Energy Co has shown little in the way of data and what they have provided has been higher than the guidelines. This could endanger the lives of farmers and livestock.

\*Undergrounding is a better option for agricultural land and landowners are more likely to agree to an easement of underground lines than overhead lines. Underground lines do not prevent any normal farming practices, take up less room, are completed quickly, have no visual impacts after construction, less biosecurity risks long term as they rarely need to be repaired, and have less EMFs. Whilst the cost of underground DC may be slightly more, it is not double as Transgrid has mistakingly quoted and the extra cost would be saved by cheaper construction cost and time saving of negotations with landowners who will be less likely to object.

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 11:49:38 AM

Submitted on Mon, 29/01/2024 - 11:49

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Michael

**Last name** Katz

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Gurrundah 2581

**Please provide your view on the project** I object to it

#### Submission

Dear Sir

I am writing to complain about the poor quality of the draft energy guidelines with respect to Transmission. In particular Sections 6.2 and 6.3 are false and misleading.

Section 6.2 Undergrounding relies on the discredited and now superseded governmentdominated report from 2023 to continue to propagate the myths and falsehoods spread by the proponents of traditional tranmission about the relative merits of undergrounding. It makes no attempt to acknowledge that other advanced countries have switched to undergrounding as the default mode of Transmission. It fails to mention the importance of resilience in building transmission networks. It specifically says that undergrounding is , "at least double the cost of above ground infrastructure." This is absolutely not the case and the Amplitude report demonstrates this conclusively. Section 6.3 Bushfire risk, is also misleading. It suggests that high voltage "lines can be quickly shut down for safety reasons..." This is simply not true either technically or politically. I will not comment on the technical issues as this is not my area but I am assured that it is not as simple as throwing a switch. If the lines are genuinely critical infrastructure they are by definition extremely important for large numbers of consumers. The decision to turn Sydney off will be passed to the highest levels of the bureacracy and potentially politics. This in itself will take time. The political will to "turn off" Sydney is clearly not a decision which will be taken lightly and also not quickly. In the meantime firefighters and residents will be at significant risk along the length of the overhead line.

There is much more to add but time is short and we do not have the benefit of a large number of highly paid staff to prepare these submissions.

Michael Katz

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 12:49:25 PM

Submitted on Mon, 29/01/2024 - 12:49

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

### Name

First name Anita

Last name O'Neil

I would like my name and personal contact details to remain confidential No

### Info

Email

**Suburb/Town & Postcode** Coolah NSW 2843

**Please provide your view on the project** I object to it

### Submission

National Parks

Internationally, there is a dearth of evidence on the cumulative impact of wind factories & transmission lines on the environment.

Two developers, TILT renewables & ACEN, are proposing three hundred & thirty three wind turbines for the Coolah region. Nowhere in Australia has such an undertaking taken place.

The cumulative impact of industrial wind factories on such a scale is unknown. Rather than tread with caution, state & federal govts are facilitating the rapid roll out of renewables without a comprehensive understanding of the cumulative impact. Governments are relying on renewable energy (RE) developers' modelling of the impact of individual wind factories.

The premise of RE modelling is the legitimisation of individual RE projects. This modelling is flawed as it is based on unsubstantiated data & predicted outcomes. It is irresponsible of state & federal govts to rely on developers' questionable modelling.

The impact of 333 wind turbines & transmission lines on wildlife will be catastrophic. According to the NSW Govt, there are 250 -350 critically endangered Regent Honeyeaters left in the wild. Despite, this TILT Renewables has approval to clear 250ha of the Regent Honeyeaters' habitat, adjacent to the Coolah Tops National Park. According to Tanya Plibersek, there are 750 critically endangered Swift Parrots left in the wild. However, Tilt Renewables has approval to clear a further 250ha of the Swift Parrots' habitat, adjacent to the Coolah Tops National Park.

And this is the environmental impact of one industrial wind factory.

The ACEN's wind factory, as well as transmission lines, are also planned for the Coolah region. This will lead to more habitat and wildlife destruction. Govts are aware that the roll out of renewable projects will lead to bird and bat deaths. TILT Renewables response to govt planning approval stated that the company would promptly act on 'carcass removal'.

We can ask the question: How much are state & fed govts prepared to sacrifice??

This submission calls for a 10km buffer zone around all National & State Parks. These are the Peoples' Parks are must not be impacted by renewable projects or transmission lines!

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 2:05:21 PM
Attachments:	nsw-wind-turbine-guidelines,-nov-23.docx

Submitted on Mon, 29/01/2024 - 14:04

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

### Name

First name Bob

Last name King

I would like my name and personal contact details to remain confidential No

### Info

Email

Suburb/Town & Postcode Waverton

**Please provide your view on the project** I object to it

Submission file nsw-wind-turbine-guidelines,-nov-23.docx (27.42 KB)

**Submission** Submission in attached file.

I agree to the above statement Yes

Dear Sirs, I wish to submit my comments to the draft wind energy guidelines November 2023

Regards,

Bob King

I would like to achieve changes so that the rural population is not so distressed.

This letter states that using LA90 for background noise levels in most states allows turbine noise to exceed these levels 90% of the time. Further setting the noise limit at a level "where 10% of people are highly annoyed" results in highly annoyed people.

I have made some recommendations.

The area of acoustics is quite complex and the wind turbine noise guidelines seem to be constantly changing, and so, I am willing to be corrected, especially if my understanding of the facts is incorrect or if I am using material that has been subsequently updated.

Please excuse me where I am wrong.

# NOW, the problems I see are that NSW measures background at LA90

In relation to LA90, if you will permit me, I say LA90 is patently absurd, or promoted by the manufacturers. (Paul Miskelly tells me that the South Australian Guidelines were devised by Sonus Pty Ltd of Adelaide who seek customers among the wind farm industry.)

L90 or LA90, as a base measure, is only used in the UK, NZ, VIC, Tas. Leq, Lden, is used in EU, Denmark, Germany, Sweden, Netherlands, Canada.

Let me juxtapose LA90 and LAeq. How many dB is typical background noise? "Ambient background noise in metropolitan, urbanized areas typically varies from 60 to 70 dB and can be as high as 80 dB or greater; quiet suburban neighborhoods experience ambient noise levels of approximately 45-50 dB" (U.S. Environmental Protection Agency 1978).

When measured at the 90% lowest level, in NSW, acoustically pristine land areas, measured mean is 23dB, rural 37dB, and quiet suburban 42dB. However the standard deviation of each is quite large, being respectively 6, 8 and 5 DdB, as also is the difference between day, evening and night. Acoustics 2019, Expected Ambient Noise levels in different Land Use Areas, Fitzell, Berry.

NSW Ambient Noise Levels, dB

Land Area		Measur	ed LA90	Observed LA90	Observed LAeq
Description	LNC	mean	S.D.	DEN	DEN
Pristine	0	23	6	17 / 14 / 10	39 / 31 / 25
Rural	1	37	8	30 / 28 / 23	47 / 44 / 40
Quiet Suburb	o 2	42	5	34 / 33 / 28	51 / 49 / 42

Note that the LAeq, equivalent continuous sound pressure, is about 17dB louder than the LA90, which is a large amount.

The significance of this is that measuring at background will be fairly common, and the actual noise to be lived through is a lot louder than the LA90 measure may imply.

#### 35dB LA90

where the noise is greater than 35dB for 90% of the time and less than 35dB for 10% of the time is BIZARRE. Why would you have a standard like this? This is like having no standard.

On this '90' standard, all the following activities **will be regarded as** acceptable, near silent, or less than 35dB-

nail gun, chain saw, barking dog, aircraft takeoff, thunder, gunshot, even warfare!, the Ukraine, Gaza.

Because for 10% of the time the noise level is probably going to be less than 35dB.

I recommend noise limits be based on LAeq.

In relation to background I say.

background noise LA 90

Now this is where the '90' could make sense. We assume that the lowest 10% of noise probably approximates the background noise, and so we call '90' the level of background noise.

#### 'background noise'

Defined as "Background noise or ambient noise is any sound other than the sound being monitored (primary sound). Background sound tends to be quieter, easier to ignore, more continuous, less variable, broader in spectrum. As a simple proxy, it is measured as the lowest 10% of noise levels being heard."

But you try making a standard around background noise! I say it will not be meaningful. You try.

Are you able to make a meaningful standard around 'background noise'.

If background sound is less than 35dB (say a quiet night) then 35dB applies. If the background noise is greater than 35dB, (say lots of equipment or farm machinery is being used), then the turbine noise may be the background noise plus 5dB.

Again the turbine only needs to be less than background+5dB for 10% of the time, and may exceed it 90% of the time, plus 5dB.

Using the logic of ad absurdium 'to the absurd', if you have a rock concert in one ear and a nearby wind turbine in the other ear, they do not cancel each other out. The sound/noise level may not be any louder, but the sound will be much more intense/powerful.

If you had 2 noise sources, that were absolutely identical in every way, you may not be able to distinguish between them, but the sound will be accumulative. Two diesel locomotives on a train will make more noise than one diesel.

#### <u>Those are TWO BIG problems</u> - 90% over, and background.

<u>I suggest we not use background noise</u> but ambient noise I personally believe background is the wrong target. I was not able to create a coherent policy using background. Did you try? 'Background' is good for the turbine owner, but not for the neighbour. 'Background' has a very specific and rigid definition.

However we could work with a noise level that is flexible, say ambient, which we can now qualify.

Say you have ambient noise. It would be good if the wind turbine made no noise, but no one is going to accept that one. I could not make a reasonable standard out of '10' or '90', but correct me if I you can. So, let's look at '50'. It would be good if the turbine noise did not exceed that level. I propose "and not to exceed mean ambient noise, based on LA50,10min". And that would maintain our quiet nights, and still let the turbine work. [Now add in the 5dB if you really must to keep the turbine people happy; but that is really complicating the comprehension of what could be simple].

Let me helicopter back out.

<u>How is the 35dB chosen</u> You know how the 35dB was chosen, but let me spell it out.

I refer to November 2018, the World Health Organization published Environmental Noise Guidelines for the European Region In 181 pages there are 180 references to 'turbine' and 219 to 'sleep'. (I commend the Commission 2022 A.R. which in 99 pages uses turbine 162 times but regret that sleep was only mentioned 15 times).

At page 23

Note that WHO uses the abbreviation 'HA' rather than 'Highly Annoyed'. "For annoyance, which is considered a less serious health effect than ... sleep disturbance ..., the relevant risk remained at 10%HA. This means the absolute risk associated with the guideline value selected should be closest to, but not above 10%HA, to be health protective."

The decision was made to select a noise level where not more than 10% of people would be "highly annoyed". {I mean can you believe this!} The level is not that of being upset, irritated or angry, but <u>annoyed</u>, and its qualification is not slightly or moderately, but of being <u>highly annoyed</u>.

ANNOYANCE (I have abbreviated from p81, I hope reasonably). "Two publications, . . in Lden, . . . noise levels from 29 dB to 56 dB. Fig. 16 shows the %Highly Annoyed. The 10% criterion for %HA is reached at around 45 dB Lden (where the two curves coincide)." [I measure from the graph that 43 is more likely.]

"There is also evidence rated moderate quality for a correlation between individual noise exposure and annoyance raw scores (r = 0.28)."

From before, you remember 35dB LA90~43dB LAden. Hence 35dB was chosen. [Also note Commissioner's 2022 Annual Report - how to compare level measures. Also:-Finally, the Independent Scientific Committee on Wind Turbines has derived a suggested wind turbine noise limit of 35 dB(A) (LA90,10-min) to ensure minimal possible annoyance. This suggested limit approximately equates to a LAeq,10-min of 37 dB(A) or a Lden of 43 dB(A).]

I say if you chose a limit level where 10% of people are "highly annoyed", what you get is 10% of those affected by turbine noise **will be** highly annoyed. And you wonder why country folk are complaining!

I recommend rather than 10%, that a 3% base be chosen, which is  $37dB Lden \sim 29dB L90$ .

#### A more significant health indicator is Highly Disturbed Sleep, HDS.

WHO says . . . "sleep disturbance can have serious effects" . . . "agreed that the absolute risk associated with the guideline value selected should not exceed 3%HSD to be health protective".

Little material had been collected on wind turbines and sleep disturbance, WHO was unable to quantify it and The Commissioner's 2022 Annual Report does not even mention Highly Disturbed Sleep.

I recommend a sleep limit be established.

#### What about indoors?

WHO "acknowledges and thanks... members of the ... Guideline Development Group,(GDR) . . .Page 9, re Environmental noise says:-"For average noise exposure, the GDG conditionally recommends reducing noise levels produced by wind turbines below 45 dB Lden, as wind turbine noise above this level is associated with adverse health effects.

"The current guidelines are intended for ...the European Region. They are therefore based on the most frequently used average noise indicators in Europe: Lden and Lnight. The Lden ... indicator can be calculated as the Aweighted average sound pressure level, measured over a 24-hour period, with a 10 dB penalty added to the average level in the night (23:00-07:00 or 22:00-06:00), a 5 dB penalty added to the evening (19:00-23:00 or 18:00–22:00) and no penalty added to the daytime period (07:00–19:00 or 06:00–18:00). The penalties are introduced to indicate people's extra sensitivity to noise during the evening and night. The Lnight indicator is the A-weighted average sound pressure level, measured over an eight-hour period during night time, usually between 23:00 and 07:00 (EC, 2002a). In these guidelines, Lden and Lnight refer to a measurement or calculation of noise exposure at the most exposed façade, outdoors, reflecting the long-term average exposure. . . . (mv underlining)

"The majority of studies . . . refer to noise exposure measured outdoors, usually at the most exposed façade of dwellings. . . . These are the practical reasons why the GDG decided not to recommend any guideline values for noise indoors.

"Nevertheless, in certain cases it could be helpful to estimate indoor levels based on outdoor values. The differences between indoor and outdoor levels are usually estimated at around 10 dB for open, 15 dB for tilted or half-open and about 25 dB for closed windows." and details are then given where to find technical specifications.

I note they do not use L90 or LA90, nor even put these in their Glossary.

Referring to ETSU-R-97, it seems to me, that it argues that there needs to be a lower limit, a background limit and a night time limit for sleep. And they are to be limits, not L90 equivalents.

#### CONCLUSION

Will you please support several suggestions by me

- 1. in NSW Background noise be a limit, and not LA90
- 2. reduce 35dB (10%HA) to 29dB (3%HA) outside at premises.
- 3. set an indoor sleep limit.

Let me finish with a joke "that windturbine noise sounds a lot louder to a neighbour than to the host who is receiving annual payments."

I thank you in advance.

Regards,

Bob King, Ph 02 9955 9210. My full name is Robert Frederick King if you want to know.

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 3:44:11 PM
Attachments:	submission energypolicyframework jasonharrop.pdf

Submitted on Mon, 29/01/2024 - 15:42

Submitted by: Anonymous

Submitted values are:

#### Submission Type

I am making a personal submission

### Name

**First name** Jason

Last name Harrop

I would like my name and personal contact details to remain confidential No

### Info

Email

Suburb/Town & Postcode Burrinjuck 2582

**Please provide your view on the project** I object to it

Submission file submission\_energypolicyframework\_jasonharrop.pdf (238.74 KB)

**Submission** Please see attach file.

I agree to the above statement Yes

#### Submission

#### in relation to

#### NSW's Draft energy policy framework

#### of November 2023

### Wind Energy Guideline

#### Wind Energy Guideline

**Section 3 - Community and stakeholder engagement**: In my experience, an applicant does not allow the community to influence the positioning/siting of turbines. These tend to be set in stone before any community engagement commences.

Section 5.1.2 – Landscape and Visual Impact Assessment: private viewpoints matter. See feedback on Technical Supplement below.

#### Section 5.3 – Aerial Fire Fighting

This section is grossly underdone. There is a real concern that turbines on towers severely impact the ability to fight fires, whether shut down or not. Because SMOKE.

Where turbines are located near forested areas which are a likely point of ignition or spread, the impact on firefighting efforts may well be the difference between getting the fire under control early, and it getting away.

#### Section 5.4 – Bird and bat impact assement

"locating turbines at least 100 m (from blade tip to nearest canopy height) away from National Parks, state conservation areas and nature reserves"

- 100 m is completely inadequate. 5km would be more reasonable where there are raptors such as white bellied sea eagles: <u>https://partner.sciencenorway.no/birds-dna-forskningno/five-kilometres-between-life-and-death-for-the-sea-eagle/1409781</u>
- Flora reserves should be included in the above, since birds and bats live in these.

"siting turbines away from key habitat and habitat features likely to be utilised by at-risk species (for example, hollow-bearing trees, wetlands and riparian corridors)"

- How far away?
- For clarity, a "riparian corridor" should include the entire river valley (if under say 5 km wide).
- Strahler stream order may be a useful tool here.

#### Section 5.6.3 – Private agreements – Impact Agreements

A major problem with wind farms is the perception that host landholders enjoy the lion's share of the benefits, whilst externalising the costs (foisting it onto their neighbours). That is, neighbours are saddled with significant impacts, despite having no effective say in whether the project proceeds.

This destroys the social harmony rural communities depend on.

A solution to this problem would be for there to be **2 buckets of money, each the same size**. One for the host landholders, and the other for neighbours within the typical 12km study area (see Figure 7 in the technical supplement).

The closest neighbours (0 to 3km) share  $\frac{1}{2}$  of this second bucket of money, the next ring (3km to 6km) share  $\frac{1}{4}$ , followed (6km to 9km) by 1/8, (9 to 12km) 1/16. This works because  $\frac{1}{2} + \frac{1}{4} + \frac{1}{8} + \frac{1}{16}$  almost equals the total sum available (15/16).

This way, the impact on all landholders in the neighbourhood is recognised and compensated.

This approach would be fair for all, and transparent, thus preserving social harmony.

The expectation should be that wind farms adopt this principle when negotiating with prospective hosts and budgeting funds for private agreements.

#### Section 5.7 – Decommissioning and rehabilitation

It is very likely that when the time comes for decommissioning, the applicant lacks the funds or willingness (or both) to fulfil its obligations. The officers and employees who instigated the project will be long gone.

The Security provided for in the model clauses is unlikely to be sufficient incentive (in part because the host landowners will not have negotiated a sufficient sum, being more focused on the here and now).

An approach is required which doesn't rely on the applicant to decommission. Possibilities include:

- Funds sufficient to cover the cost of decommissioning are lodged with government early in the life of the project
- Applicant contributes to a pool which may be used. (However, this is not likely to be sufficient if many wind farms fail to decommission)

The model clauses do not compensate impacted adjacent landholders for the ongoing impacts of any failure to decommission?

#### Section 6 – Other Assessment Issues

**Biodiversity:** an applicant should be required to fund an independent biodiversity assessment, if requested by concerned community members. This would help to address concerns that surveys undertaken on behalf of the applicant don't "look hard enough": they are of inadequate duration and geographic coverage.

**Hazards:** see comments on bushfires in 5.3 above. Bushfires are a sufficiently serious issue that they should be elevated and treated at a main heading level in their own right, rather than relegated to several throw away paragraphs.

#### Technical Supplement for Landscape and Visual Impact Assessment

It seems implicit in this document that the only private receivers which matter are dwellings.

This is largely because table 2 (p21) only refers to dwellings (with the exception of private recreation areas which are classed as "very low viewpoint sensitivity"), and "Private receiver" is defined as:

A privately owned or used viewpoint type identified in Table 2

So private viewpoints which are not dwellings are defined out of existence.

Note: confusingly (given the definition), the supplement also says:

While Table 2 is a good guide, it is not determinative, and the other inputs must be considered in arriving at the final rating.

In relation to dwellings, it contains this circular/self-evident statement:

In assessing the visual impacts on dwellings, the assessment must focus only on views from the dwelling and not from the property boundary or other parts of the property.

The idea that views from dwellings are the only thing which matters is fundamentally misconceived. Inside a dwelling, most of the time, you are doing other things eg cooking, eating, sleeping, watching TV or using computer/phone, not looking out the window at wind turbines. Yes, if you have a balcony/verandah you might use that to enjoy the view. Or you might see them whilst washing the dishes.

But it is quite likely that any private viewpoints of moderate or high scenic quality are elsewhere on a property, and may in fact be the main attraction of the property.

One is much more likely to be aware of turbines whilst outside elsewhere on the property, than in the house, and it is very important that this impact be acknowledged. A simple way of doing this is by evaluating private viewpoints.

**Recommendation**: explicitly recognise the importance/relevance of **private viewpoints** by:

- Including them in table 2 on equal footing with dwellings in rural areas
- Defining the term "Private Viewpoint"

As things stand, it is possible that the value of a private viewpoint could be recognised indirectly, provided a dwelling entitlement could be exercised at that viewpoint. However, 3.3 says the assessment should "be confined to dwelling entitlements located within the setback".

Here is a photomontage of a proposed wind farm adjacent to my property, prepared using a 300m turbine blade tip height.

Figure 2 "Setback from sensitive receivers" suggests the setback for that is 2500m.

The closest of these turbines is some 3000m away:



Despite the fact that the visual magnitude here must be high or very high (per appendix B), this is irrelevant from a dwelling entitlement point of view because these turbines are outside the setback?

**Recommendation:** remove the reference to setback from the dwelling entitlement considerations. Instead, treat the location as an assessable viewpoint, for which the applicant must address the relevant performance objective.

#### Technical Supplement for Noise Assessment

Applicant should fund an independent noise assessment, if requested by an impacted land holder.

Wind Energy Decommissioning Calculator No feedback

Transmission Guideline No feedback

Solar Energy Guideline

No feedback

### Benefit-Sharing Guideline

No feedback

### Private Agreement Guideline

There is an inequality in bargaining power between the Applicant/Developer and impacted neighbours: it becomes a case of take it or leave it.

Experience suggests that Applicant/Developers take advantage of this bargaining power to:

- 1. Offer payments which do not adequately compensate for the impact suffered;
- 2. Include onerous terms;

A solution to the quantum of payment problem is offered above  $(\frac{1}{2} + \frac{1}{8} + \frac{1}{16})$ . This way, what the neighbours get is tied to what the hosts negotiate and therefore find acceptable.

Examples of particularly onerous terms:

- a charge over the land plus caveat (the private agreement guidelines should make it clear a charge + caveat is not appropriate).
- any clause which makes it more difficult to sell/transfer the land than the model clauses envisage (for example, by requiring Developer consent to the sale especially without any 'reasonableness' requirement)

What carrots/sticks does the Department have at its disposal to encourage the Developer to stick closely to the model clauses in the case of adjacent land impact agreements?

Could adjacent landholders be given the right to insist on the model clauses, without the threat of reduced Compensation Amounts (compared to the Developers favoured terms)?

Jason Harrop 29 January 2024

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 3:52:12 PM

Submitted on Mon, 29/01/2024 - 15:51

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Jessie

Last name Reynolds

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Adelong 2729

**Please provide your view on the project** I object to it

#### Submission

I welcome the opportunity to comment on the Draft Transmission Guideline (Guideline). It's critical to get NSW transmission planning correct given the Draft Transmission Guideline says 4,000 kilometres of new transmission lines is required in NSW, as we transition to net zero emissions, over the next two decades.

However, the Draft Transmission Guideline is disappointing as it fails to recognise the significant benefits of undergrounding transmission, as follows:

• Eliminates the risk of overhead lines causing bushfire;

• Eliminates hazards to air and ground bushfire control;

• Eliminates the risk of interruption to power transmission in severe weather events and/or bushfires and therefore improves transmission security and resilience as required under the SLACIP Act;

• Minimal impact to private or public land after construction is complete;

• No overhead lines impeding agricultural operations, machinery use, irrigation, or aircraft operation;

- No visual impact from overhead transmission lines;
- No corona effect noise impacts that occur with overhead transmission lines;
- Less transmission losses with HVDC underground cables;
- Little to no electromagnetic field impacts; and

• A much-reduced easement size with undergrounding, with the possibility to horizontal directional drill sections, and therefore considerably lower biodiversity impacts.

A recent poll by the Guardian said that 70 per cent of people believed the transition to net zero shouldn't be at the expense of communities and the environment. Also 65 per cent of people were against overhead transmission lines. It is important to take the opinions of the people of Australia into account when developing a Transmission Guideline. Overhead transmission lines cause enormous harm to communities and the environment and must carefully planned.

In the Transmission Guideline, we urge you to have:

1. Undergrounding as the default when looking at transmission options in NSW; and 2. All the costs (all first round direct and indirect costs, including costs to communities and the environment) of transmission options included early on in the planning stages of transmission projects – in the cost-benefit analysis of AEMO's Integrated System Plan and in the RIT-T undertaken by Transgrid.. Including all costs when assessing transmission options is essential to achieving efficient outcomes in the national electricity market.

Engineers are telling us that there have been major advances in underground cabling technology, it is entirely feasible and the world is looking on in disbelief as Australia builds more overhead transmission lines.

Governments overseas have come to the conclusion, that when you take into account all the environmental costs of overhead transmission lines, undergrounding is the least-cost long run option.

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 3:55:13 PM

Submitted on Mon, 29/01/2024 - 15:55

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** John

Last name Gormly

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Gulgong

**Please provide your view on the project** I object to it

#### Submission

Good Afternoon,

My name is John Gormly and I live at 1303 Blue Springs Road Cope via Gulgong. On an adjoining 'host' property, to our west, the RES Wind turbine project want to erect 5 off-shore height wind turbines, less than 2.5 kilometres from our home.

My understanding of the history of The New South Wales Wind Turbine Guidelines C2008, is that some 16 pages were sourced from the World Health Organisation 184 page guidelines on wind turbine night noise in Europe.

The NSW Government adopted the 35db maximum noise level, without including the WHO provision on noise cancellation by European major roads, railway lines, airports and industrial complexes that may be operating at night.

The C2008 NSW guidelines did not consider that Rural NSW has zero noise, at night. This has still not been addressed, to my knowledge.

It is probable, that with the absence of background noise, 35 db is too high.

#### HISTORY OF WIND TURBINES C2008

\*The 2 kilometre setback was found inadequate, especially when topography was undulating. Turbine 'hum' was heard out to 6km, even though the height of the turbine was 100 metres.

\*Low frequency noise, Infrasound was identified worldwide, including the Flinders University, as causing night-time arousals and sleep deprivation.

\*Methods to combat LFN were tree plantings, Robust masonry construction with double glazed windows and 'piped' music. None of these had any effect.

#### OFF-SHORE SIZED WIND TURBINES IN RURAL SETTINGS.

\*These 250 metre high turbines throw noise further than their C2008 counter parts. \*The De Bergs 'bounce' zone has gone from 1350 metres (C2008) to 3 kilometres. The set back in 2008 was under rated at 2 kilometres. This should now be 6 kilometres.

#### WHAT 1S LOW FREQUENCY NOISE

\*Man-made mechanical changes to air pressure (pulses).

\*The present system was developed by Mr Harvey Fletcher of the Acoustical Society of America in 1920.

\* The human hearing has a range from 100hz to 10,000hz. Low Frequency Noise has frequencies as low as 1 hz.

\*20hz has a wavelength of 17 metres and 1 hz has a wavelength of 343 metres. This is why LFN cannot be impacted by Robust masonry construction.

\* Scientists are no longer longer measuring traditional db noise readings, as they are measuring total acoustical energy and whole body noise exposures within the acoustic environment.

#### EFFECTS OF LFN ON THE HUMAN BODY ..

\*Wind turbines create LFN down-wind of the source, in scattered pulsations of sound. \*Portable 'back pack' military devices using concentrated LFN are said to have effect out to 5 kms.

\* The effects of LFN are diopathic symptoms.

In the 2nd phase: cognitive deficits, vestibular disturbances or both.

\*The danger to Police / military, as well as protestors is hearing damage.

#### MEDICAL DISEASES CAUSED BY LOW FREQUENCY NOISE.

\*High proliferation of late onset epilepsy.

\*Thickening of the cardiovascular structures.

\*Coronary Thrombosis Infarction.

\*Thickening of the Pericardia sack around the heart.

\*Respiratory - Plural diffusion.

\*Thickening if the alveoli walls.

\*Trachea swelling.

\*Lesions on the lungs

\*VAD - Vibracoustic Disease.

#### AUSTRALIAN AND WORLDWIDE REGULATORY.

\*The Australian Senate Select Committee on Wind Turbines - 29 June 2015. Established that there was a direct pathway to disease, resulting from wind turbine noise emissions.

\* The World Health Organisation October 2018 -

Abstract:

While conditional knowledge is given to pulsation (impulsive amplitude modification) and

Infra and Low Frequency Noise, the WHO report underscores the failure of current Regulators of db to manage health impacts from industrial wind installations, worldwide. The WHO recognises that noise is more than 'annoyance' (and annoyance is a lesser concern than sleep deprivation) and that chronic noise contributes to cardiovascular disease, lack of sleep, hearing loss, tinnitus, stress and high blood pressure.

#### REFERENCES

\*National Library if Medicine. Nubian.num.nih.gov

\*Prof. Mariana Alves-Pereria - Infasound and Low Frequency Noise 'A Public Nightmare' (Medical) YouTube.

\*masterresource, org. World Health Orginisation Guidelines 2018.

#### MY OBJECTION AND RECOMMENDATION

\*That there be a mandatory set back of 6km between homes and larger wind turbines. \*That banks of wind turbines not be placed to the west of homes as blade flicker will commence from 2pm.

\*Bats feed in the horizontal plane and mate in the vertical plane. This may contribute to large numbers of bat kills.

Please note that there are 2 Threatened bat species that live on Cockabutta Creek and feed at Narragamba Swamp, adjacent to the proposed wind turbines.

\* There are 9 sedentary 'Threatened' bird species that feed where the RES Barney's Reef Wind Turbines are to be installed.

\*The Minister would have more than sufficient information, from this paper, to invoke the Precautionary Principle, until a mature decision is made to wind turbine placement and numbers.

\*The proposed RES Barney's Reef Wind turbines are to be install less than 2.5 kilometres from our home, which is constructed of timber and corrugated steel sheet.

#### YOUR REPLY

\*If you find exception to any of my statements, would you please reply in writing. Otherwise, I will assume that you are in agreement.

Kind regards John Gormly

We will need you in a couple days if not

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 4:51:07 PM

Submitted on Mon, 29/01/2024 - 16:50

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Rosemary

Last name Miller

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** RYE PARK NSW 2586

**Please provide your view on the project** I object to it

#### Submission

I strongly oppose this Draft Energy Policy Framework just as I strongly oppose green renewable energy in the form of wind and solar and the encompassing storage batteries for the following reasons:

1. Even in their hundreds, it has been recognised Wind and Solar Farms have no hope of providing a sufficient, reliable and

continuous source of electricity to support the required baseload let alone the needs of commercial and domestic consumers.

2. With a productive life of only around 15 to 20 years maximum, they are only a band aid solution to the energy crisis unless renewed at an enormous cost which undoubtedly will be passed onto the consumer.

3. If not renewed, the disintegrating turbines and solar panels should be decommissioned, again at a huge cost, or as is more than likely be left to cause much pollution, particularly

resins, fibre glass and toxic metals such as cobalt which brings me to another point. In case of cobalt, this is dug out of the ground by hand by slave labour in the form of poverty stricken children in the Congo. The Australian Government should hang its head in shame for participating in this dreadful practice.

4. The vast destruction of Forests, Grasslands and Waterways habitat for our native wildlife and birds, many of which are critically endangered or on the threatened list. Again the Australian Government should hang its head in shame.

5. But not satisfied with just destroying pristine bush and grasslands, but now valuable food and fibre producing farmland All to make way for massive, high voltage, above ground transmission lines. Lines which not only cause havoc on bird life and increase bush fire risk but also vulnerable to storm damage. It doesn't seem to matter to the current government that many overseas countries, where it is mandatory that such transmission lines be put underground, cannot believe that Australia is still constructing them above ground. "Too Expensive" the government screams when it has been authentically proven to be only one and a half times more expensive and a far better and secure system. In conclusion I honestly think it's time the government realises what a futile exercise it is to be going down the wind and solar path and to reconsider another way. Swallow your pride and "Do The Right Thing!"

Yours Sincerely Rosemary Miller

I agree to the above statement Yes

From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 5:48:27 PM
Attachments:	se-submission-to-draft-energy-framework-guidelines jan-24.pdf

Submitted on Mon, 29/01/2024 - 17:42

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am making a personal submission

### Name

**First name** Sally

**Last name** Edwards

I would like my name and personal contact details to remain confidential No

### Info

Email

Suburb/Town & Postcode Coolah 2843

**Please provide your view on the project** I object to it

Submission file se-submission-to-draft-energy-framework-guidelines\_jan-24.pdf (98.1 KB)

**Submission** PUBLIC SUBMISSION: Submitted by Sally Edwards, Coolah NSW

Please find attached 7 page submission document in objection.

Thank you for considering my points of feedback. I am deeply concerned at the ongoing disregard to transparent and fair community engagement practices, particularly by EnergyCo. I have focused my submission on the Draft Benefit Sharing Guidelines. I estimate that this submission, in total took me over 10 hours to research, prepare and submit. I only reviewed 1 of the 4 guidelines on display. This is all volunteer time, add to

this the volunteer time it took for each and every submission you receive. Please know and understand that our communities are really concerned for their future. A future where being called a "modern-day power station" or a "Renewable Energy Power Plant of the Future" is touted as something great or beneficial. A future where the significant cumulative and residual impacts to rural and regional areas, to the environment and landscapes are being overlooked – all in the name of a "Rapid Transition to Renewables" driven by global commitments.

If saving the environment and our planet are the true motivators for this policy, why isn't it paramount that we get it right? It would be a terrible, terrible shame for our wildlife and environment and for rural Australia to pay these ultimate prices - costs and losses that can never be recovered.

I agree to the above statement Yes

# DRAFT Energy Policy Framework - (Submissions close 29<sup>th</sup> Jan 2024)

## Items to be considered:

ltem	Document Location	Feedback
Exhibited Documents	https://www.pl anningportal.n sw.gov.au/draft plans/exhibitio n/draft-energy- policy- framework	There is a desperate and HIGHLY IMPORTANT NEED for detailed Cumulative Impact Guidelines. Guidelines that consider identifying, assessing, collating and summing and ongoing monitoring for ALL CUMULATIVE IMPACTS of the Renewable Energy Transition. This includes but is not limited to Cumulative impacts to total Agricultural land lost and re-purposed, loss of community character and connection, total loss of habitat and wildlife, loss of landscape and visual amenity over vast tracts of land and distances, damage to neighbour relationships, loss of land access, loss of property rights, increased burden on Local Government, lack of Local Government resources to meet increased needs eg. Services and resources, inequity in disruption and destruction to environment and rural and regional community's locations - i.e MAJORITY WEST of the great divide and minimal impacts to suburbia and city areas.
Access	Advertising	The advertising methods used to promote this exhibition weren't holistic and didn't consider reaching a significant portion of the population. i.e FB Targeted advertising and The Land Newspaper (for our area). What was the target population numbers and how did this limited advertising intend to meet that?
Participation	Policy	The number of submissions received indicates a data set for participation. What % of the target population actually participated. How is this evidenced to the public? Can this be demonstrated as proportionate to the significance of the Framework State-wide? It must be.
Homes Powered	Numerous	There must be Industry standard set for the calculation that developers can use to claim or state, how many "homes will be powered" by their project. There is no consistency and the figures quoted don't actually seem to correlate to the actual consumption of an average home. As we power our home and farm by majority renewable energy, we have a sound knowledge of the average consumption of a small home/family of four. These marketing numbers don't stack up and they are extremely misleading and ultimately incorrect. The biggest consumers of electricity aren't even Aussie homes.
Min Distance	Wind/Solar	I recommend that a minimum distance be stated for both wind and solar infrastructure from any non-participating neighbours boundary.
Animal habitat	Wind/Solar	While both guidelines reference any direct impacts to wildlife or habitats, there appears to be no requirement to provide field studies and impact assessments for the long-term effects of animal habits within the impacted areas. What long-term impacts occur to the social and breeding habits of birds, bats and animals whose habitat is impacted? These must be considered, especially when REZ areas are seeing neighbouring projects put forward. Where will displaced animals and birds actually go? How will this impact their breeding habits and the long-term viability of the specie?
Decommissioning	Wind Guideline	THERE MUST BE CONSIDERATION GIVEN TO THE POTENTIAL for rehabilitating bushland after decommissioning. Trees cannot successfully regrow in 1m of soil, their roots needs access to the earth and not just top-soil. If the land was woodlands or bushland,

r	1	
		the base of the turbine must be removed or a mitigation strategy formulated that WILL ALLOW for bushland and Australian Native Trees to regrow successfully, without creating further risk (trees falling over due to limited root hold on the earth.
Decommissioning	Wind/Solar	The decommissioning calculator. I am unable to ascertain that this calculator is fit-for-purpose and a reliable function to base decommissioning on.
		I note the decommissioning section in the wind guidelines is still quite brief (1.5/47 pages) and I fail to understand how that can be so, for such an important part of the guidelines?
		Please provide the public with more detail on how this calculator can be relied upon and why?
Compulsory	Overview	"Consistent with section 2.6 of the draft Wind Energy Guideline,
Acquisition	Document and	identify that the Minister will consider requests to declare solar
	Wind Guideline	energy development as Critical State Significant Infrastructure if
	2.6	it includes a significant energy storage system (for example, a
	2.0	delivery capacity of 750 megawatts or more)." I object to this
		additional power being included. CSSI and SSI classification - If Wind
		and Solar or BESS projects can be classified as CSSI or SSI projects,
		this enables Compulsory Acquisition powers for the associated land.
		I believe that this additional power should never be granted to a
		project owned by commercial developer or proponent. If the project
		is a State owned project, then I see this as acceptable (although often
		unfair). This should not be granted to any project that seeks to
		construct purely for commercial profit, even if it happens to be
		"critical" in size and therefore helping the State meet the
		commitments it has made around Energy transition.
Guidelines	DRAFT Benefit	Overall, this document lacks substantial detail. Consider the number
proportionate to the need?	Sharing Guideline	of pages in the Private Agreement or Wind Guideline, and the 15 odd pages in the Benefit Sharing Guidelines is inadequate. It also
		demonstrates a clear disconnect between impacted/host
		communities and the proposed Benefit Sharing ideas.
Implementation	PROCESS	What will the implantation process of these guidelines be, how will
		that work for projects already in the Planning Portal. Where has this
		been clearly communicated to the public?
Introduction	DRAFT Benefit Sharing	Definition of "firming"? What is this? Is the definition included anywhere?
Introduction	Guideline Pg 4	Developments to perighbours? Here? Mare datail required Calculation
Introduction	DRAFT Benefit Sharing	Payments to neighbours? <b>How? More detail required.</b> Calculation methods? What constitutes a neighbour? What if they say no? Is it fair
	Guideline Pg 4	
Introduction	DRAFT Benefit	and equitable? Dot point 6 describes a benefit for the host community to be local
Introduction	Sharing	consumer benefits from low-cost Energy. <b>HOW? More detail</b>
	Guideline Pg 4	required.
Introduction	DRAFT Benefit	The assessment process under the EP&A Act 1979 does not and
	Sharing	cannot possibly provide adequate cumulative impact assessments.
	Guideline Pg 4	The REZ model is new and encompasses so many projects to
		culminate into one delivery (over 45 in our REZ to date) and is
		presenting significant cumulative and residual impacts that <b>must</b> be
		assessed and monitored from a State and National perspective.
Introduction	DRAFT Benefit	Paragraph 4 – "advice on how community benefit sharing <b>can</b> be
	Sharing	incorporated" This language is non-committal. Could can be
	Guideline Pg 5	replaced with WILL? Similar language with the use of "consideration"
	. 0 -	

		and "encourages". Where is the commitment that these guidelines
		WILL actually ensure something?
Introduction	DRAFT Benefit	Total Benefits listed: \$413 million
	Sharing Guideline Pg 5	When you add up the figures for each REZ – it adds up to \$414 million. One of these figures must be a mistake?
Introduction	DRAFT Benefit	\$414 million OVER 25 years, = approx. avg \$5.3m/year for the CWO
Introduction	Sharing	REZ, although I imagine more will be delivered during construction.
	Guideline Pg 5	What does that \$ pool actually intend to cover?
		This amount of money is quite disproportionate to the size of the
		regions this is impacting and when reflected upon, is fairly
		insignificant in the scale of things. For delivery of a regional
		infrastructure project, it certainly doesn't take much to spend \$5m,
		especially when you consider adequate feasibility studies and cost
		benefit analysis determination etc, even before detailed planning is
		reached. This funding pool is not fit-for-purpose. It certainly doesn't
		allude to the possibility of the 3 outlines for incorporation as listed on
		Pg 5 being successful.
Introduction	DRAFT Benefit	"The policy will ensure that communities located both inside and
	Sharing	outside REZs benefit from renewable energy development in their
	Guideline Pg 6	regions and that the benefits will be proportionate to the amount
		and scale of development"
		<b>HOW</b> will the policy ensure that communities INSIDE and OUTSIDE a
		REZ receive benefit? Out of which funding pool? Who will assess and
		monitor this?
		<b>HOW</b> will the benefits be determined that THEY ARE INDEED
Introduction		proportionate to the amount, scale and VALUE of the development?
Introduction	DRAFT Benefit Sharing	Language in Purpose of the guideline is NON-COMMITTAL i.e "provide advice", "should be", "encourage", "support". Everyone of these dot
	Guideline Pg 6	points need to be re-written to demonstrate commitment and action.
		There needs to be provision for future accountability of the DPHI.
Introduction	DRAFT Benefit	Language in APPLICATION Of the Guideline is NON-COMMITTAL i.e
	Sharing	"will need to consider" and "should also be considered".
	Guideline Pg 6	Applicants MUST be asked to demonstrate consideration and
		associated actions based on this consideration. These guidelines
Benefit Sharing for	DRAFT Benefit	should clearly stipulate that. Paragraph 4 and 5:
Renewable Energy	Sharing	"Benefit sharing initiatives can also help to mitigate broader
Honowabio Enorgy	Guideline Pg 7	intangible impacts of projects" The funding pool described on Page 5,
		does not allow for mitigating these broader intangible impacts of
		projects.
Benefit Sharing for	DRAFT Benefit	Majority of paragraph 1 is a repeated paragraph from earlier in the
Renewable Energy	Sharing	document. Necessary?
Donofit Charing of	Guideline Pg 8	Devezymente 2 first contones: Devezymente arcenteresis atoreses!
Benefit Sharing for Renewable Energy	DRAFT Benefit Sharing	Paragraph 3 first sentence: Renewable energy projects generally have limited impacts on local infrastructure and services
I NEILEMANIE EILEI BY	Guideline Pg 8	
		This is NOT FACTUAL – especially in a REZ situation. The impacts
		on our LGA to infrastructure and services are beyond our Councils
		capabilities and this SHOULD NOT BE UNDERESTIMATED.
		I would go one step further and suggested that Local Government
		should have a funding provision to conduct a Capability Study for the
		successful delivery of the REZ, to better equip them to meet the
		increased demands.

Benefit Sharing for	DRAFT Benefit	What is the purpose of Paragraph 4 RE RATES?? Will it stay this way?
Renewable Energy	Sharing	
	Guideline Pg 8	
Benefit Sharing for Renewable Energy	DRAFT Benefit Sharing Guideline Pg 8	Regional communities may experience the industrialisation of rural areas <u>without</u> seeing the long-term benefits of increased local economic activity and improved public and commercial services that often accompany high employment-generating development and related urbanisation.
		This is fairly blasé language for this very serious risk. I don't feel the Benefit Sharing Guidelines give enough consideration to these substantial risks to all the regional and rural communities within a REZ.
		THIS NEEDS TO BE HIGHLIGHTED AND BROUGHT TO THE FOREFRONT OF THESE GUIDELINES AND ASSOCIATED CONSIDERATION
Benefit Sharing for Renewable Energy	DRAFT Benefit Sharing Guideline Pg 9	Neighbourhood Benefits – which includes local community members and small neighbourhoods
		What neighbourhoods are classified as small neighbourhoods? Rural communities don't really have "neighbourhoods"? The regional centres do, eg. North Tamworth, South Tamworth but this is ambiguous and needs clarification. Distance, criteria, specifics are needed here etc.
		This implies neighbours to Transmission projects too – PLEASE CLARIFY
Benefit Sharing for Renewable Energy	DRAFT Benefit Sharing	<ol> <li>Benefit Sharing is collaborative</li> <li>"designed in partnership with Councils".</li> </ol>
	Guideline Pg 10	This is making an assumption that all Councils have sufficient skill, capacity, resources and relationship with community. This is of concern to me. It does not give consideration to Councils that are limited by their capacity, capabilities and resources. It also does not consider communities that are within a LGA where the Council does not have a transparent and effective working relationship with community.
Benefit Sharing for Renewable Energy	DRAFT Benefit Sharing Guideline Pg 10	3. Benefit sharing is transparent Please list HOW AND WHERE the mentioned information is publicly
Benefit Sharing for Renewable Energy	DRAFT Benefit Sharing	available. 4. Benefit sharing is community focussed
	Guideline Pg 10	It is well past time that the NSW State Government stopped thinking that CONSULTATION with communities is enough. It isn't. The Federal Community Engagement review by the Australian Electricity Infrastructure Commissioner will provide clear evidence of this.
		SO MANY TIMES I SEE the "Quality Assurance Standard for Community & Stakeholder Engagement (International Association for Public Participation (IAP2) 2015)" being referenced as the standard by which the Community Engagement is delivered AND NEARLY EVERY TIME it is all talk and NO DEMONSTRATED OR EVIDENCED ACTION.
		Rural communities have an undervalued pool of knowledge, skills and experience that could be used to collaborate with and value-add

	1	
		to the knowledge of "experts" BUT it is not. It is unrecognised, undervalued and completely overlooked. The wide array of skills required of rural landholders and farmers, are both unique and extremely diverse. Many of the skills required to operate a "normal" business enterprise are required, along with many other both industry and science and nature specific knowledge and skills and put together with qualities and attributes that can be hard to find in any group of people, or even experts. Qualities like "observation skills", "common sense", "practical decision making", "selflessness", "loyalty", "sacrifice", "strength and persistence in extraordinary situations", while these qualities certainly do exist elsewhere, the main point of this, is that they are not valued, sought out or utilised by anyone merely conducting consultation. Community engagement is MORE THAN JUST CONSULTATION. It is inviting participation, collaborative planning, involving, collaborative delivery and ultimately empowering for communities. It's time to start walking the walk, not just talking the talk when it comes to community engagement.
Benefit Sharing for Renewable Energy	DRAFT Benefit Sharing	5. Benefit sharing is proportionate
Therewable Lifergy	Guideline Pg 10	Who measures and assesses this? I don't believe the Pool described
		on Page 5 is a sufficient demonstration of this.
Benefit Sharing for	DRAFT Benefit	Dot point 5 of the Neighbourhood Benefits: offering neighbours
Renewable Energy	Sharing	subsidies (such as energy discounts or free connections) or
	Guideline Pg 11	investment/co- ownership opportunities
		I have not seen this benefit proposed in any of the EIS for projects that I have reviewed. What is the likely eligibility of such a benefit? Eg. A rural community surrounded by 300 Turbines. Are there qualifying factors?
Benefit Sharing for	DRAFT Benefit	"the Department recommends that these programs be <b>centrally</b>
Renewable Energy	Sharing Guideline Pg 11	administered and distributed through the council of the relevant local government area. Alternatively, these programs could be administered by the applicant in partnership with an established community organisation or institution"
		This is making an assumption that all Councils have sufficient skill,
		capacity, resources and relationship with community. This is of
		concern to me. It does not give consideration to Councils that are
		limited by their capacity, capabilities and resources. It also does not consider communities that are within a LGA where the Council does
		not have a transparent and effective working relationship with community.
Benefit Sharing for	DRAFT Benefit	Last para where it refers to "bigger community projects or services"
Renewable Energy	Sharing	
	Guideline Pg 11	There should be consideration outlined in the guidelines, for the
		proximity of community projects/services/infrastructure to the
		impacted/host communities. In an amalgamated Council, the host community could end up not being the direct benefactor of a
		community project built 100km or more away, as the Council has
		such a large LGA to govern.
Benefit Sharing for	DRAFT Benefit	If using a Planning Agreement mechanism to establish a community
Renewable Energy	Sharing	benefit fund would ultimately include the formation of a 355
	Guideline Pg 12	Committee of Council, this unfortunately gives Council the power to

		make the final decisions on distribution. As the recommendations made by the 355 committee can be adopted or not by Council.
		This is making an assumption that all Councils have sufficient skill, capacity, resources and relationship with community. This is of concern to me. It does not give consideration to Councils that are limited by their capacity, capabilities and resources. It also does not consider communities that are within a LGA where the Council does not have a transparent and effective working relationship with community.
Benefit Sharing for	DRAFT Benefit	Dot point 3 of the Council Public Register identifies that – "the
Renewable Energy	Sharing Guideline Pg 12	consultation that was undertaken to identify and develop each initiative."
		THIS IS WORTHLESS without setting a target of min % level consultation that must be achieved. I have attended COUNTLESS Council Community Consultation sessions where 1 or 2 people turn up. This is NOT COMMUNITY CONSULTATION, but yes, consultation WAS UNDERTAKEN (it just wasn't successful). It is time to start asking every level of government to provide evidence of a minimum level of consultation THAT MUST BE ACHIEVED.
Benefit Sharing for	DRAFT Benefit	Examples of expenditure that might be suitable under a council-
Renewable Energy	Sharing	managed community benefit fund include:
	Guideline Pg 12	• recurrent costs of infrastructure, services or facilities
		THIS CANNOT BE PERMITTED, IT IS SIMPLY WRONG and supports inefficient Councils to continue be inefficient and under-resourced. This must be identified as INELIGIBLE expenditure of a Council-Managed community benefit fund.
Benefit Sharing for	DRAFT Benefit	Last paragraph.
Renewable Energy	Sharing	
	Guideline Pg 12	WHO decides who will manage the fund? The applicant or developer? And at what stage? At what stage of the planning process must the management of the community benefit fund identified.
Benefit Sharing for	DRAFT Benefit	Regional Benefits
Renewable Energy	Sharing Guideline Pg 13	"EnergyCo is coordinating regional scale mechanisms to share benefits from renewable energy projects across local government areas within REZs."
		Is this the \$132m pool described on Page 5 for the CWO REZ – please clarify the pool the regional benefits comes from and what funding program guidelines they are administered under.
Benefit Sharing for	DRAFT Benefit	3.3 Applicant Considerations
Renewable Energy	Sharing Guideline Pg 13	Dot point 1 – Please describe HOW the engagement MUST take place Dot point 2 – at what point of the planning process does the applicant need to publicise their proposed model for community benefit sharing?
Benefit Sharing for Renewable Energy	DRAFT Benefit Sharing	Dot point 3 requests that Applicant's "outline" the projects proposed model for Community Benefit Sharing in the EIS for the project
	Guideline Pg 14	THIS ALLUDES TO THE POSSIBILITY, that while an outline is included in the EIS, it will predominantly be "broad concept" and the details, will come in "detailed design".

		It is very important to communities and to Councils that the details are included in the EIS about this, not just an "outline" or a "broad concept". This should be required in these guidelines. This should also be made mandatory for the management structure to be outlined also at the EIS stage.
Benefit Sharing for	DRAFT Benefit	3.4 Review of benefit sharing approach
Renewable Energy	Sharing	
	Guideline Pg 14	This section is not clear, particularly for those that don't have an understanding of land use revenue settings, land rating systems or infrastructure contributions. I recommend that this section be expanded to clearly outline the intentions of the Review of benefit sharing approach. What will the monitoring process be for the trigger of a review if
		changes are made? Current review process by Councils is often inefficient.

Thank you for considering my points of feedback. I am deeply concerned at the ongoing disregard to transparent and fair community engagement practices, particularly by EnergyCo. I have focussed my submission on the Draft Benefit Sharing Guidelines.

I estimate that this submission, in total took me over 10 hours to research, prepare and submit. And I only reviewed 1 of the 4 guidelines on display. This is all volunteer time, add to this the volunteer time it took for each and every submission you receive. Please know and understand that our communities are really concerned for their future. A future where being called a "modern-day power station" or a "Renewable Energy Power Plant of the Future" is touted as something great or beneficial. A future where the significant cumulative and residual impacts to rural and regional areas, to the environment and landscapes are being overlooked – all in the name of a "Rapid Transition to Renewables" driven by global commitments.

If saving the environment and our planet are the true motivators for this policy, why isn't it paramount that we get it right? It would be a terrible, terrible shame for our wildlife and environment and for rural Australia to pay these ultimate prices, costs and losses that can never be recovered.

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 6:55:15 PM

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Julia

Last name Young

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2354

**Please provide your view on the project** I object to it

#### Submission

I support the Voice for Walcha submission. I am a resident of the district. The Planning Department needs to understand the concern of the proposed project from the whole community, not a small group and an International turbine company with no interest in the future of the existing industries within this LGA.

79.5% of our surveyed community indicated that they are concerned and object to the Winterbourne Wind development in a range of areas ie traffic, business, environment, agriculture, water, roads and tourism, all negatively impacted. The Planning Department states that community participation is an essential part of the process and development assessment. Planning Department states projects of state significance are approved if they are considered to be in the public interest and address relevant policy. Winterbourne Wind development is deemed state significant without community consultation/ social license.

Careful consideration is necessary for location for projects such as this, World heritage Werrikimbi, national park, UNESCO listed is next to proposed site.

Large scale projects need community support, all projects appear to negatively impact communities as developers continue to use unscrupulous methods to lure landowners, The Planning Department need to work with community members not select few.

Julia Young

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 7:09:32 PM

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Emily

Last name Bookallil

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Armidale

**Please provide your view on the project** I object to it

## Submission

Visual impact should not be assessed on a tree or a group of trees. They get old and fall down or a natural disaster wipes them out (like we had in our area last year). Saying that a hedge or alike can be grown to hide 300 meter tall turbines is quite insulting. Thank you

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 11:24:12 PM

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Archie

Last name Bowman

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Merotherie 2844

**Please provide your view on the project** I object to it

#### Submission

I object to this project because as with all the CWO REZ projects there has been minimul consultation with the community and landholders who are not directly affected by these projects. The companies such as energy co appear to be consulting with the community, but they are just a presence in the town. They give no answers to questions and send pretty girls with nice smiles to win the people over. The meeting that are held are a waste of time and always seem to be held when the people objecting too the project are away fighting this project at rallies, trying to get the government to listen to us. It is a disgrace how this whole thing is raping NSW of prime agricultural land. Why does this small area of NSW have to bear the brunt of supplying electricity to the whole of NSW. It is unjust and unfair.

#### I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 11:31:41 PM

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

**First name** Edward

Last name Bowman

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Merotherie 2844

**Please provide your view on the project** I object to it

**Submission** I object to this project.

From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 11:29:57 PM
Attachments:	draftwindenergydecommissioningcalculator-gob-comments.xlsx

Submitted by: Anonymous

Submitted values are:

#### Submission Type

I am making a personal submission

## Name

First name Glen

Last name O'Brien

I would like my name and personal contact details to remain confidential No

# Info

Email <u>Glen@oxleycivil.com.au</u>

Suburb/Town & Postcode 2354

**Please provide your view on the project** I am just providing comments

## Submission file draftwindenergydecommissioningcalculator-gob-comments.xlsx (51.93 KB)

#### Submission

As a qualified civil engineer who worked in the construction industry for 20 years including 10 of those on renewable energy projects both Wind and solar i am writing to provide feedback on the assumptions made using you decommissioning Calculator.

Was this developed by a graduate engineer? There is a serious underestimation of decommissioning costs giving false misrepresentations by the department of planning to land hosts for decommissioning.

I have attached your spreadsheet with initial comments.

The decommission calculator is a present day cost and not a future cost. Incorrect productivity rates are very common throughout. Outdated crew rates and your resources for each task are light on.

The decommissioning per turbine should be in the order of 700- 900k present day value. This is well above your estimates.

There are also big assumptions about what the host farmer may be happy with. We all know the biggest cost of decommissioning is removal of the concrete foundation. Farmers will want the foundations removed to ensure the land can be rehabilitated correctly.

The white elephant is security bonds for these projects. Decommissioning costs for the full amount need to be linked to the developer or whoever the project is on sold to. A farmer cannot be expected to front up these costs.

Т

From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 8:16:37 PM

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name richard

**Last name** young

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode walcha

**Please provide your view on the project** I object to it

### Submission

- the whole procedure has been operating with a lack of social license

- there has been no clear details on decommissioning of turbines

- to much pressure on local roads that can hardly handle the amount of traffic we have at the present

- we need the use of aviation for our agriculture in this area, which means for any decent production we need the use of airplanes and helicopters to cover the land.

- we cannot jeopardise the safety of our residents, on farmland or in town with limiting the airspace that rescue services can use. Peoples lives could be at RISK!

#### I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 8:29:14 PM

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

## Name

First name Lock

Last name Rogers

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Guyra

**Please provide your view on the project** I object to it

#### Submission

There is nothing renewable about wind and solar except a stream of Australian dollars mainly to China.

Farmers who host wind turbine factories do it out of ignorance and short sighted greed and fear of missing out.

Wind turbines are an environmental disaster, not producing as much energy as it took to mine and transport the iron ore, copper, and the rest of the minerals needed.

EVERYTHING in wind and solar factories is either derived from fossil fuels or needs the base load energy from the same hydrocarbons.

WHY REDUCE CO2 IN THE ATMOSPHERE when it is 0.04% of the atmosphere and reducing it would jeopardise all plant life on this planet.

What is the carbon footprint of 2000 tons of concrete under every turbine?

Who will decommission (dump in landfill) wind and solar factories when the projects may well be on sold multiple times?

Who will be responsible for the environmental destruction of vital habitat and farmland and killing of endangered raptors and other bird species?

Who will repay me as a tax payer for the obscene subsidies paid to the developers? Who will repair the damage of the extreme division of rural and regional communities who were never ever consulted if they wanted these so called renewable energy zones.

## I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 8:38:15 PM

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Jessica

Last name Cameron

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode 2354

**Please provide your view on the project** I object to it

## Submission

I strongly object to this project.

I don't believe the project has handled in compliance with social licence regulations for this project to go ahead.

I do not believe significant time has been provided for the community to respond to environmental impact statements. Which has resulted in marginalising the community.

I don't feel that the project is supporting the community and the impacts it will have on the small community such as Walcha.

The way the project has been approached has left myself and other residents feeling powerless and under minded by National and international developers.

# I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 9:18:18 PM
Attachments:	<u>k durack submission.pdf</u>

Submitted by: Anonymous

Submitted values are:

#### Submission Type

I am making a personal submission

## Name

First name Kate

Last name Durack

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Walcha 2354

**Please provide your view on the project** I object to it

Submission file k\_durack\_submission.pdf (75.05 KB)

**Submission** Please find my attached submission.

# Firstly, I endorse the written submissions by Red4NE and Voice for Walcha, and support all the points that were raised in these submissions.

I believe some of the sweeping statements used within the report appear innocuous on initial gaze, however under closer scrutiny, have enormous implications on small communities - that unless you are living in them - you can't begin to understand. I have seen this first hand in Walcha. The fact that Walcha is even in a REZ beggars belief!

Fundamentally, a detailed examination and developer accreditation (early in the scoping stage) need be undertaken long before the declaration of any zones, projects, acquisitions etc can be placed firmly in the planning system. In the case of Walcha, had the guidelines been robust enough, the sheer cost of **any** proposed project in this area should have ruled out the southern half of the New England for anything other than agricultural pursuits, let alone the enormous environmental and social damage it will do (and is already doing).

#### One example I was particularly annoyed by was the "Map' debarkle ...

I was so heartened to see that the initial NSW REZ map produced on (16/11/23) in the report had a sliding scale which (rightly) indicated that Walcha and surrounds, were in a "Less Suitable" zone – hooray some common sense! – but with lobbing from somewhere (hmmm) this was only to be over turned a few days later (20/11/23) with another one of those 'little innocuous changes', 'wouldn't hurt a fly', and we Walcarian were reclassified "Suitable" – just like that! .... How can I possibly have faith in the department to be independent and fair while following a set of rules that can be so easily (and quickly) changed if the heat in the kitchen gets too hot?

#### I'm really worried that my community will be left worse off than when I arrived here over 12 years ago.

The uncertainty of the renewable rush will potentially leave this area scarred with monoliths, a fractured community, long forgotten after the projects dry up and the contractors move onto the next unsuspecting community.

I worry that money casually thrown around – such as in VPAs - will have a negative effect long term on the community. I mean realistically, how many new BBQ sets or playgrounds can one community have!

Proper funds need to be set up early to protect the community from developers walking away at the end of a project leaving the clean up to someone else – why is there no bond required as it in is other large scale developments?

I'm really worried about noise – I want real 'honest' observations undertaken – not ones completed at a 'more favourable time of year' – giving developer more 'flexibility'. At the end of the day, I'm the one living here **not them!** 

I worry about the shedding from the blades – and the nasty cancer spreading chemicals in them – yes, I understand if it was only a few turbines in large area, it probably wouldn't have a huge effect on people and the environment, but in the case of Walcha where 100's and 100's of turbines are being proposed – this is almost unthinkable! So the cumulative effect of these prodigious developments will have, must be thoroughly investigated.

Other issues that need 'realistic impact consideration' include, aerial agriculture, firefighting, rescue and retrieval, and general aviation. Traffic implications – especially with local roads that will have an negative impact on how those communities do everyday business.

And at the end of all this, the most important item that needs definition (and it may not be a one size fits all) but whether or not, you have social licence – "real community based" licence .... To date, I have not seen a compelling answer to this simple question.

Kate Durack Walcha, NSW

From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 9:21:59 PM
Attachments:	draft-energy-policy-framework-submission.pdf

Submitted by: Anonymous

Submitted values are:

## Submission Type

I am making a personal submission

## Name

**First name** Emma

**Last name** Bowman

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Dunedoo 2844

**Please provide your view on the project** I object to it

Submission file <u>draft-energy-policy-framework-submission.pdf</u> (135.88 KB)

**Submission** Please find attached submission.

## **Draft Energy Policy Framework Submission**

I am a fifth generation Dunedoo district farmer and I have many concerns regarding the "rapid transition to renewables" including but not limited to, land use conflict, bushfire risk and firefighting limitations, roads and transport, visual amenity and noise, community division and water use.

In November 2021, my property, unknowingly and unwillingly, became part of the Central West Orana Renewable Energy Zone (CWO REZ). This declaration was made without consulting those it has gone on to affect the most, farmers and rural and regional Australians. The cumulative impacts on communities within the five REZ's in NSW will be extensive and have the potential to severely limit our farmers capacity to feed the nation.

Whilst the Wind and Solar Guidelines will possibly go some way to limiting the effects of large scale renewable energy generation projects on rural and regional NSW I do not believe they are comprehensive enough to protect farmers and landowners who will likely be most affected. Is this enormous infrastructure really required to power the nation in the future? Were there other options investigated that could make use of existing infrastructure and include small scale renewable energy projects that would not have such devastating effects on our most valuable food and fibre producing regions (ie. community owned and run solar systems or subsidies and incentives for solar on every roof and batteries in every garage)? Why does rural and regional NSW, and Australia have to bear the burden of energy generation into the future for the whole state and country?

A big focus of these guidelines is ensuring renewable energy generation projects are approved more quickly. I believe this will be to the detriment of the whole population as due diligence and common sense will be lost in the "fast" transition. Community consultation has already shown to be lacking, what will a more hasty process mean for locals who would like to have their opinions considered and landowners who know their country better than anyone?

## **Draft Wind Energy Guideline**

Firstly, I would like to convey my extreme disappointment and disapproval at the "suitable areas for wind energy development" map being changed without any transparency. It seems the only reason there is now a statement on the website is the feedback provided by those who noticed the unadvertised switch. This statement does not adequately explain why the changes occurred.

## Impacts on Agricultural Land, Wildlife & Habitat

Whilst the impacts on agricultural land for wind developments are not as all-encompassing as solar there are still many risks. Removal of trees is not only eliminating wildlife habitat but has the potential to cause erosion in many areas due to the usual terrain suitable for wind turbines. There will also be implications post decommissioning considering the concrete pads are to be left in situ; this means trees will not be able to grow in these areas. Better decommissioning rules should be put in place for wind projects. <u>Local knowledge</u>

Local knowledge needs to be considered more heavily. There are many "experts" engaged to consult on various aspects of wind projects during the planning and approval stages. The vast majority of these "experts" are not local, nor living day to day life in the field they are assessing. During preliminary consultation local landowners and community members should be engaged to provide information about many potential impacts instead of relying on "experts" who are "educated" in the appropriate field. This should also apply to solar projects.

## Community & Stakeholder Engagement

The document states that "effective community and stakeholder engagement is essential for the development of the wind energy industry and the environmental assessment process" and "applicants must undertake meaningful engagement with stakeholders throughout the environmental impact assessment process and during the construction, operation and decommissioning phases of the project". What constitutes "effective" and "meaningful" engagement? Is it consulting 50% of the affected population, or 30%, and asking them for and listening to their opinions, or is it just holding drop in

sessions in any community deemed affected and ticking that box regardless of how many community members participate?

Community consultation fatigue is a major problem in the CWO REZ; I can only assume the same will happen in the other REZ's in NSW. It is difficult to keep up with which project is where and who owns what when there are 48 projects operating, under construction and proposed in the district. I believe proponents should work together to better manage community engagement practises in an attempt to save the community UNPAID time. This is time away from our small businesses and families when all the developers' employees are paid.

The above also applies to all renewable energy related projects.

## <u>Biosecurity</u>

There needs to be much more stringent measures placed on biosecurity risks. The spread of noxious weeds and animal diseases have the potential to devastate agricultural areas. Who will be responsible for assuring compliance by proponents, and contactors, in relation to any biosecurity measures implemented? And who will be responsible if there is a spread of weeds or an animal disease that can be attributed to a certain project or projects?

The same applies for solar projects.

## Visual & Noise Impacts

As with all potential impacts from wind installations, visual and noise impacts are assessed by "experts" who do not and will not live in the affected area. It's very easy to consider impacts "minor" or "negligible" when you don't personally have to live with the consequences.

The Technical Supplement for Landscape and Visual Impact Assessment states "almost all wind energy developments are comprised of similar infrastructure that exhibit common characteristics including colour, texture, movement and contrast with the rural landscapes in which they are typically located." Where in rural or regional NSW are there structures as large or imposing as wind turbines? This comment goes to show that those assessing visual impacts are out of touch with the reality of the rural landscape! It is stated that there is an exposure limit of 30 hours per year of shadow flicker. As a sufferer of chronic migraines I would suggest that 1 hour would be too much for anyone with neurological issues. When is a medical situation taken into account by a renewable energy project developer?

Similar could be said for noise generated by wind turbines. Whilst "experts" might agree that the noise emitted is not significant I believe those who are most affected by that noise would disagree.

Again, those most affected should be added to the list of "experts" engaged to assess the projects merits and impacts.

There is often mention of "visual screening" to mitigate visual impacts from non associated dwellings. Considering the growing time of most vegetation I suggest that any plantings must be in place 20 years prior to project construction, or mature trees should be planted. In both cases the proponent should be responsible for caring for the trees and replacing any as needed.

Visual impacts should not only be considered from dwellings. Most farmers spend more time in the paddock than their homes. We currently have very picturesque landscapes whilst we work. Changing that to an industrial landscape will be a huge adjustment and should be taken into consideration. Critical State Significant Infrastructure

The draft wind energy guideline states "the Minister may declare development to be Critical State Significant Infrastructure (CSSI) under section 5.13 of EP&A Act if it is considered essential to the State for economic, environmental or social reasons." I wholeheartedly object to wind, or any renewable energy development, being declared CSSI as the landowners consent is not required for this type of application. This would effectively take away landowner property rights!

## Benefit Sharing

The amount of money recouped by renewable energy developers through large scale energy generation certificates, a scheme created by the Federal Government as part of the Renewable Energy Target to promote renewable energy generation, is such that the benefits shared with communities "hosting" the projects should be much more significant.

<u>Compliance</u>

Who is responsible for policing conditions of consent or any other restrictions placed on wind developments? Neighbouring landowners and other community members should not have this burden placed on them. There should be DPHI staff on site at each project to monitor compliance.

## **Draft Transmission Guideline**

## Agricultural Land Use

The draft guideline states "agricultural land can continue to support grazing and cropping uses adjacent to and underneath transmission lines. For this reason, the cumulative risks and impacts to agricultural land and productivity due to transmission infrastructure are typically very low." Again, the assessment is carried out by those who are not directly impacted. The real life impacts on agriculture are shown when farmers cannot fit their machinery under transmission lines proposed to split the property in half, effectively limiting the activities the landowner can carry out on his/her land!

Any proposed transmission projects should be carried out with transparency and honesty, engaging compassionately with affected landowners throughout the whole process. The bullying and disrespect shown by EnergyCo during the "consultation" for the CWO REZ transmission project has been nothing but disgusting! This should not ever happen – but I understand even with the feedback already given EnergyCo is continuing to use the same tactics with the projects that will follow the CWO REZ transmission project ie. Hunter Transmission.

## <u>Bushfire Risk</u>

Whilst it is stated that "when planned and maintained properly, high voltage overhead transmission lines do not pose a risk of igniting bushfires" that does not account for a fire ignited by other means. The guideline also says that "in the event of a bushfire, transmission lines can be quickly shut down for safety reasons. This greatly reduces the risk of fire spreading and causing significant damage to infrastructure and also allows on-ground and aerial firefighting activities to be carried out with significantly less risk." In a major bushfire event, like the one that burnt a large proportion of the proposed CWO REZ transmission route in 1979 or the Sir Ivan Bushfire that burnt 55,000ha of mostly farmland in the Dunedoo/Coolah district in 2017, I do not believe RFS crews will not be permitted on the ground or in the air in the vicinity of major infrastructure (especially transmission lines close to wind turbines or a solar project). If our district is left without aerial assistance during major bushfires we will have more instances of severe fires like Sir Ivan! Who, as always, will be left to clean up the mess?

## Solar Energy Guideline Update

## Impacts on Agricultural Land

Land use conflict is a major issue when considering large scale solar developments. While there is an opportunity for sheep to graze under solar panel installations, I do not believe this is a long term solution and there has not been enough research done into possible negative effects on the livestock. It is my understanding that some sheep have perished under solar arrays due to lack of airflow in periods of extreme heat. I also have doubts about the long term grazing possibility given the lack of opportunity to improve soil and therefore grow nutrient rich feed to sustain sheep under solar panels. I have been informed that sheep have been known to chew wires, turn off emergency switches (stopping energy production) and climb on panels (breaking them). I do not imagine any of these things are conducive to effective energy generation.

During construction of solar projects contour banks, dams and trees are removed. Whilst dams and contour banks can be reinstated relatively quickly, shade trees, used to provide shelter from the elements for livestock will take at least 30 years to establish. This suggests to me that any land taken out of production for a solar installation will not be able to be fully functional for agriculture for 60 years post construction (assuming a project would be utilised for 30 years).

How will Australian farmers feed the growing population with less agricultural land available? <u>Planning Framework</u>

As mentioned above I do not believe solar developments should ever be declared Critical State Significant Infrastructure (CSSI) by the Minister.

Site Selection

The "suitable locations for solar development" map engulfs the NSW food bowl; this is some of the most productive land in the state, and country. I understand this map does not mean the whole area will be built out with solar developments but the number of installations already operating, under construction and proposed will place more pressure on food and fibre production.

## Benefit Sharing

The amount of money recouped by renewable energy developers through large scale energy generation certificates, a scheme created by the Federal Government as part of the Renewable Energy Target to promote renewable energy generation, is such that the benefits shared with communities "hosting" the projects should be much more generous.

## <u>Compliance</u>

As above in the wind guideline comments.

## Draft Benefit Sharing Guideline

The benefit sharing guideline needs to consider Councils that lack the capability and capacity to properly deliver community benefits. It also needs to better account for neighbours and communities that bear the brunt of the potential impacts of the proposed project.

## **Draft Private Agreement Guideline**

There is a lot of disparity from developer to developer and even landowner to landowner within the same development. There has been a lot of "divide and conquer" tactics used with both private developers and public authorities. Landowners need to be better protected and developers and public authorities need to have regulations (not just guidelines/recommendations) around how they must engage with landowners. Any discussions should be open and transparent with all involved landowners negating the need for confidentiality clauses. While different properties have different implications and landowners have different priorities there needs to be an adequate starting point that satisfactorily protects landowners.

## **General Comments**

There are a lot of references to "should", "consideration" and "encourages" suggesting the guidelines are recommendations not enforceable requirements. I believe these guidelines should be used to protect rural and regional NSW, landowners and communities from the "rapid transition to renewable energy" and therefore should be must more rigid.

Most renewable energy proposals advertise "number of homes powered by the project". After researching a considerable number of projects I have come to realise these figures are neither consistent, nor realistic. My property is solely powered by solar energy so I have come to understand the benefits and limitations of this sort of installation. Is there an industry standard for the above calculation? Does it allow for powering homes 24 hours, 7 days a week, or only when the renewable energy project is producing power at its peak?

A minimum set back from neighbouring landowners boundaries should be set for all renewable energy projects – wind, solar, BESS, transmission and pumped hydro. Whilst not all hazard risks can be confined to the property "hosting" infrastructure every possible measure should be taken to limit risks to neighbours and the greater community. For instance, wind turbines should be set back so in the case of blade throw or a fallen turbine there is no impact to the neighbouring property.

Insurance liability is something that isn't openly discussed with affected communities. This is liability for "hosts", neighbours and the general population. For instance, as a landowner I have public liability insurance – what happens if I accidently started a fire that spread into a project that is worth 100 times my policy value? This is a very contentious issue that hasn't been answered by any proponents to date.

What is the timeline for implementation of these guidelines? There are many projects in the CWO REZ already preparing EIS's, will they be subject to these changes?

All EIS's I have read are missing a lot of detail that is said to be left to "detailed design", "further refinement" or "post development consent". I believe there needs to be more restrictions around what community members will not have a chance to comment on. It is not fair that in many cases there is no feedback sought for where water will be sourced, what roadworks will be completed etc.

The required minimum period for EIS exhibitions is currently too short. Proponents have years to prepare the documents but we, the community, are given 28 days to read and respond. In the case of the CWO REZ transmission EIS documents totalled over 7900 pages. To find anyone who had the capacity to read all of that information, whilst also working full time, would be nigh impossible. It is only fair that the EIS exhibition period minimum should be extended to 12 weeks to give the community most affected a decent opportunity to respond to any issues; especially for those communities being bombarded with multiple projects.

Due to the overwhelming amount of research, reading and submissions I have partaken in over the last 6 months I have not had an adequate amount of time to fully read and respond to all of the documents provided in the draft energy policy framework. We are being bombarded with legislation, policy and project proposals due to the "rapid transition to renewable energy". Would it not be better to have balanced and thorough investigation into the potential impacts of the transition, or even other possible options to large scale renewable energy projects, rather than rushing into the current plan?

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 9:36:53 PM
Attachments:	renewable-energy-submission- 0.docx

Submitted by: Anonymous

Submitted values are:

#### Submission Type

I am making a personal submission

## Name

First name Suzanne

Last name Lord

I would like my name and personal contact details to remain confidential No

## Info

Email

Suburb/Town & Postcode Walcha 2354

**Please provide your view on the project** I object to it

Submission file renewable-energy-submission-\_0.docx (15.83 KB)

Submission WIND TURBINES SHOULD NOT BE LOCATED ON PRIME AGRICULTURAL LAND

WIND AND SOLAR FARMS SHOULD BE BUILT ON LEAST PRODUCTIVE LAND

AUSTRALIA HAS A FINITE RESOURCE OF PRIME AGRICULTURAL LAND The Government and Planning Departments have not come to terms with Australia having very little prime Agricultural Land and vast tracts of comparatively unproductive land. Quality Agricultural land is a finite resource.

The Planning Departments need to consider Australia's importance in World Food Security.

HOUSES DO NOT BELONG ON FLOOD PLAINS that are PRIME AGRICULTURAL LAND

Planning Authorities continue to expand urban areas to sprawl out over prime agricultural land all along the eastern seaboard on very fertile land originally used for growing vegetables ideal for supplying the Sydney basin and other densely populated areas on the east coast. These areas have always been known to be flood plains, yet the NSW Planning Department deems them suitable for housing... BAD DECISION!!

NSW PLANNING DEPARTMENTS GOT LOCATION WRONG (building on known flood plains)

Similarly...

WIND TURBINES SHOULD NOT BE LOCATED ON PRIME AGRICULTURAL LAND NSW PLANNING DEPARTMENTS HAS WRONG LOCATION FOR WIND TURBINES (similar to wrong location for many housing developments on known flood plains)

The NSW Planning Department continue to have little regard for location of proposed Solar and Windfarms. This is particularly evident in the New England region of NSW. The New England region of NSW is among the most climatically safe (not as drought prone as other regions) and most important livestock producing region in NSW.. WIND AND SOLAR FARMS SHOULD BE BUILT ON LEAST PRODUCTIVE LAND

RELIANCE ON AVIATION – RISK AVIATION SAFETY

Much of the New England area is reliant on aviation

Wind turbines risk aviation safety for aerial rescue, aerial fire bombing, aerial spreading fertiliser

# THERE NEEDS TO BE A BOND TO PROTECT LANDHOLDERS and COMMUNITIES

The wind turbines have a limited operating life.

The projects can potentially change ownership several times during the life of the project. DECOMMISSIONING BONDS need to be STARTED EARLY in the operation life of the project to ensure landholders are not left with dangerous, unsightly and contaminating infrastructure.

DECOMMISSIONING = SAFE REMOVAL and DISPOSAL of PROJECT INFRASTRUCTURE

Decommissioning needs to dispose of all waste in an environmentally responsible manner. At this point little of the infrastructure is able to be recycled.

ALL SURVEYS IN THE WALCHA COMMUNITY HAVE INDICATED CONCERN or REJECTION of WINTERBOURNE WIND PROJECT There needs to be regard for Social Licence

I AM AGAINST LARGE SCALE WIND FARMS PROPOSED FOR THE NEW ENGLAND REGION

## WIND TURBINES SHOULD NOT BE LOCATED ON PRIME AGRICULTURAL LAND

## WIND AND SOLAR FARMS SHOULD BE BUILT ON LEAST PRODUCTIVE LAND

AUSTRALIA HAS A FINITE RESOURCE OF PRIME AGRICULTURAL LAND

The Government and Planning Departments have not come to terms with Australia having very little prime Agricultural Land and vast tracts of comparatively unproductive land.

Quality Agricultural land is a finite resource.

The Planning Departments need to consider Australia's importance in World Food Security.

#### HOUSES DO NOT BELONG ON FLOOD PLAINS that are PRIME AGRICULTURAL LAND

Planning Authorities continue to expand urban areas to sprawl out over prime agricultural land all along the eastern seaboard on very fertile land originally used for growing vegetables ideal for supplying the Sydney basin and other densely populated areas on the east coast. These areas have always been known to be flood plains, yet the NSW Planning Department deems them suitable for housing... BAD DECISION!!

NSW PLANNING DEPARTMENTS GOT LOCATION WRONG (building on known flood plains)

Similarly...

## WIND TURBINES SHOULD NOT BE LOCATED ON PRIME AGRICULTURAL LAND

#### NSW PLANNING DEPARTMENTS HAS WRONG LOCATION FOR WIND TURBINES

(similar to wrong location for many housing developments on known flood plains)

The NSW Planning Department continue to have little regard for location of proposed Solar and Windfarms. This is particularly evident in the New England region of NSW.

The New England region of NSW is among the most climatically safe (not as drought prone as other regions) and most important livestock producing region in NSW.

#### WIND AND SOLAR FARMS SHOULD BE BUILT ON LEAST PRODUCTIVE LAND

RELIANCE ON AVIATION – RISK AVIATION SAFETY

Much of the New England area is reliant on aviation

Wind turbines risk aviation safety for aerial rescue, aerial fire bombing, aerial spreading fertiliser

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Decommissioning needs to dispose of all waste in an environmentally responsible manner.

At this point little of the infrastructure is able to be recycled.

# ALL SURVEYS IN THE WALCHA COMMUNITY HAVE INDICATED CONCERN or REJECTION of WINTERBOURNE WIND PROJECT

There needs to be regard for Social Licence

I AM AGAINST LARGE SCALE WIND FARMS PROPOSED FOR THE NEW ENGLAND REGION

From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 9:54:49 PM
Attachments:	submission-to-nsw-planning-re-draft-wind-energy-guidelines.pdf

Submitted by: Anonymous

Submitted values are:

#### **Submission Type**

I am submitting on behalf of my organisation

## Name

**First name** James

Last name Litchfield

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Cooma 2630

**Please provide your view on the project** I am just providing comments

Submission file submission-to-nsw-planning-re-draft-wind-energy-guidelines.pdf (243.54 KB)

**Submission** See attached file.

## DRAFT WIND ENERGY GUIDELINE - SUBMISSION

This submission is on behalf of the members of Rural Landscape Monaro Incorporated. (1400+ facebook members aka REAL Monaro).

We wish to highlight three points for the Department of Planning to consider:

- 1. The visual impact of wind turbines from areas other than the dwelling. Farmers spend 90% of their time on their land away from their house.
- 2. "Grasslands" is currently included in the frame of reference for scenic quality value as an indicator of low value. This fails to recognise that some areas are naturally treeless and are unique because of this.
- 3. The set back for wind turbines from dwellings where the turbines are higher than 250m should be more than 2km.

Guideline text is in italics, with red text for focus and our comments are highlighted in yellow.

## Page 8 1.3 Approach to assessment

## Visual impact assessment

This is the process for determining the day-to-day visual effects of a project on people's views (what people see at a place, when they are there) from the private and public domain.

## Dwellings

In assessing the visual impacts on dwellings, the assessment must focus only on views from the dwelling and not from the property boundary or other parts of the property.

The "day-to-day" visual effects of a project on people's views surely means during working hours.

Those who farm and graze the land spend 90% of their waking hours outdoors working the land, and a relatively short time at their dwelling, mostly at night time.

Visual impact assessment should include viewpoints from where a landholder spends their day working. The visual impact from a dwelling could be assessed as negligible while at the same time the visual impact from the rest of the property could be huge. This needs to be included and assessed.

## 1.1 Purpose

The technical supplement also aims to:

• recognise that changes to our landscapes will be necessary to facilitate the transition to renewable energy, and balance the need for this change with the need to protect unique and highquality landscapes

# 2.1 Baseline analysis

The baseline analysis should identify and describe the elements that make up the landscape in the study area, including:

the aesthetic and perceptual aspects of the landscape, particularly emphasising those that are key characteristics contributing to the distinctive character of the landscape (such as its scale, complexity, openness, tranquillity or wildness)

## Page 22 Scenic Quality

Table 4 Frame of reference for scenic quality values

	LOW
Vegetation	Extensively cleared
	and cropped areas
	with very limited
	variation in colour and
	texture
	Pastoral areas,
	human created
	paddocks, pastures or
	grasslands and
	associated buildings
	typical or grazing
	lands

The Purpose of the technical supplement states that the need for change must be balanced with the "need to protect unique".... landscapes

There are landscape areas with high scenic quality that are grasslands. There should be a provision for unique grassland landscapes to be given high scenic quality.

For example, the Monaro is a natural treeless plain described by prominent Geoscientist Dr Ian Roach, as "a vast naturally treeless plain or steppe that is geographically unique in Australia."

There should be a provision in the **Frame of reference for scenic qualities** that includes "**landscapes** <mark>that are unique"</mark> as stated in The Purpose above.

# Wind Energy Guideline

The new visual impact methodology builds on foundational principles from the existing guideline but provides a wholly revised approach to provide greater certainty and expedite decision-making. This includes a setback for wind turbines that are fully visible from people's homes (for example 2 km from a turbine 250 m tall).

Given that the setback for wind turbines that are fully visible from people's homes should be 2km from a turbine 250 m tall tower, the **setback for a turbine taller than this should be 3km or at least** <mark>more than 2km.</mark>

Rural Landscape Monaro Incorporated (aka REAL Monaro)

Contact : James Litchfield 0417 676 561 litchfield@hazeldean.com.au

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 11:36:18 PM
Attachments:	narelle-martin-submission.pdf

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

First name Narelle

Last name Martin

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Beechworth 3747

**Please provide your view on the project** I am just providing comments

Submission file narelle-martin-submission.pdf (162.16 KB)

**Submission** Please find attached a submission.

From: Narelle Martin Director, Regional Change Agency narellem@regionalchangeagency.com.au

29 January 2024

#### **Draft NSW Energy Policy Framework**

Thank you for the opportunity of commenting on the Draft NSW Energy Policy Framework.

I have substantial experience with regional and rural communities. This includes as a volunteer with a number of community groups including Renewable Albury Wodonga (RAW). This group had a focus on working to ensure all members of the community could take advantage of the rapidly changing energy landscape. On a professional level I have been working in the environmental area for around thirty years, with a focus on climate change for the last sixteen. I am a strong supporter of renewable energy and the potential benefits that can flow from an economy geared around renewable energy.

I also have experience with local government. I live in Victoria, at Beechworth but work in NSW with local councils. Communities and local governments have significant challenges arising from the roll out of large scale renewables, and transmission lines.

I note that the purpose of the new energy policy framework is to:

...support faster and more consistent decision-making and provide greater certainty for the energy industry and communities. The framework includes guidelines that outline how the impacts of renewable energy projects and transmission infrastructure will be assessed and managed.

The guidelines will ensure communities benefit from renewable energy development and have more transparency and clarity about where and how development occurs.<sup>1</sup>

Not included in this is the goal to ensure an equitable outcome for the communities that are most impacted by the change in landscape, or to address current inequities being experienced by rural communities with poor and unreliable electricity services.

# The NSW Electricity and Supply and Reliability Check Up (Marsden Jacobs) August 2023 and the government response has an excellent overview of the current process and challenges.

The Marsden Jacobs report makes the following points:

- The Roadmap infrastructure is financed by distribution consumers rather than being funded by general taxation...
- The mechanism for recovering Roadmap costs is by way of distribution network charges that flow into retail bills for NSW consumers.
- Essential Energy's network charges are higher than the other two distribution networks in NSW.

<sup>&</sup>lt;sup>1</sup> <u>https://www.planning.nsw.gov.au/policy-and-legislation/renewable-energy/energy-policy-framework</u>

 Stakeholders also raised that under current arrangements, costs are recovered from distribution customers. They questioned the equity of this arrangement given that large energy users are typically connected to the transmission lines. The current arrangements leave large energy users immune to the Roadmap costs and instead residential customers wear a disproportionate share<sup>2</sup>.

All of the policy documents are focussed on very large scale renewable energy projects, and transmission lines. The urgency for the Roadmap and this review of the Energy Policy Framework is driven by the potential for shortages of electricity as old and increasingly uneconomic coal fired power stations break down, or close. A major risk identified within the documents and explicit is the threat posed by the lack of social licence.

While the Marsden Jacobs report has a good outline of the community challenges (section 9) including costs referred to above, there did not appear to be an acknowledgement of the current energy poverty of some communities. There are communities across NSW who have very poor electricity supply. Towns are experiencing regular blackouts or brown outs, and may not have access to reliable or sufficient electricity during heatwaves. Poor supply and reliability of electricity also reduces the economic opportunities for new business, development, and expansion for a number of these communities.

If these fundamental inequities are not being addressed people can have legitimate grievances that their energy costs are increasing while their amenity and landscape is being impacted. Given that there is also an increasing active disinformation campaign against renewable energy being waged, the loss of social licence looms as a significant barrier for the success in transforming the electricity landscape in NSW.

There is an urgent need for more attention to be paid to ensuring that Essential Energy and other players ramp up their focus on existing regional and rural customers. These customers also need reliable, renewable energy. There is an opportunity to use the current electricity distribution network combined with smaller solar farms (as an example) and batteries to allow for more reliable energy, and increased self-sufficiency of communities. Done well, it may also lead to increased economic benefits.

I look forward with interest to the outcomes of the submissions for the Energy Policy Framework.

Yours sincerely,

Narelle Martin B.Ec., M.Env.St., M.A.P.P.

<sup>&</sup>lt;sup>2</sup> Marsden Jacobs, NSW Electricity and Supply and Reliability Check Up, August 2023. Pp 94-97

From:	Department of Planning Housing and Infrastructure
To:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 10:55:24 PM

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

# Name

First name Amanda

Last name Bowman

I would like my name and personal contact details to remain confidential No

# Info

Email

**Suburb/Town & Postcode** Birriwa 2844

**Please provide your view on the project** I object to it

#### Submission

There has been minimal consultation with landholders and communities in relation to the whole CWO REZ, even though they say they are consulting, it is little to no consultation. The drafts keep getting changed, from only small wind turbines not close to residences to much bigger and taller...they keep moving the 'goal posts' for wind turbines, solar farms and the transmission lines with absolutely no realisation that this infrastructure will have a huge impact people who live within the CWOREZ. Not only that, but it is totally destroying the capacity for prime agricultural land to continue to be productive-there will be thousands of hectares no longer able to be used for sustainable agriculture.

#### I agree to the above statement

Yes

From:	Department of Planning Housing and Infrastructure
То:	DPE PS ePlanning Exhibitions Mailbox
Cc:	DPE Energy and Resources Policy Mailbox
Subject:	Webform submission from: Draft energy policy framework
Date:	Monday, 29 January 2024 10:54:58 PM

Submitted by: Anonymous

Submitted values are:

**Submission Type** I am making a personal submission

## Name

**First name** Rik

Last name Shepherd

I would like my name and personal contact details to remain confidential No

# Info

Email

Suburb/Town & Postcode Elong Elong 2831

**Please provide your view on the project** I object to it

#### Submission

I strongly object to ALL wind and solar factories on prime agricultural land OR native forests AND the myriad transmission corridors required to hook them all into the grid.

The Spicers Creek Wind "Farm" is 6km from my property and encompasses a 120 degree arc to my east. The turbines are so tall that they will be easily visible across the entire eastern horizon.

I have only just discovered this "plan" as there has been zero consultation, let alone notification of this proposal, the only thing I did hear about was a transmission corridor about 20 km away well over 1 year ago.

In an urban environment people are "allowed" to object to the local authorities to any development that directly impacts them INCLUDING their view.

This does not appear to be the case with these monstrosities, if a farmer decides to allow either the turbines, solar panels OR the transmission lines on their property, EVERY neighbour for many km around will suffer THEIR decision, which hardly seems remotely fair.

Being on stand alone wind and solar myself I know just how many issues are involved and these can ONLY be resolved in my case with a large diesel generator. With the closure of all the coal fired power plants and the Labor government's efforts to abolish gas production AND use as well, what backup system will these renewables use?

My well sited 5kW wind turbine only works about 25% - 28% of the time due to too little or too much wind. Solar is at the vagaries of available sunlight, cloud cover and of course the hours of darkness and late afternoon and early morning sunlight patterns, so effectively being useless for 12 - 14 hours per day, it is not uncommon to have several days of dense cloud and the batteries don't MAKE energy, they just store it and are VERY soon exhausted.

A grid capable battery system would need to be enormous to have ANY chance of maintaining power for hours or days, at least 1000 TIMES larger than the largest bank ever constructed! AND lithium ion battery fires are well reported, a perfect disaster in rural areas!

How this concept could EVER be considered a basis for a full grid RELIABLE energy system is utterly beyond me

ALL of this rubbish is made in China, one would think that IF Australia was so hell bent on installing the things they could at the VERY least make them here, the transport requirements alone, both sea and land are massive AND consume huge amounts of fossil fuels

My final point is that these things don't last anywhere NEAR their advertised service life (solar in particular is VERY susceptible to hail damage as well) and even if they go the distance how are we to dispose of them "responsibly" as despite what "experts" tell us, there is no economic method of disposal of these highly toxic items and they end up in landfill.