New South Wales Government
Independent Planning Commission

EMMA BOWMAN **OBJECT** Submission No: 196949

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Attachment:	*Spicers Creek Wind IPCn Submission.pdf*		

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Please find attached objection to Spicers Creek Wind.

SPICERS CREEK WIND IPCn SUBMISSION

Introduction

The Spicers Creek Wind project has the potential to have enormous impacts on the local community and region due to a plethora of possible unintended consequences of turning rural agricultural land into an industrial area.

Excerpt from DPHI Assessment Report	Response/Issue/Question
Executive Summary	
"The project would save up to about 2,060,000 tonnes of greenhouse gas emissions per year and would make a material contribution towards the State meeting its net zero targets and the renewable energy objectives of the Roadmap."	**Whilst the project may contribute to the State meeting its net zero targets and the renewable energy objectives of the Roadmap, what will the implications be for average Australians already suffering from high food prices and farmers attempting to increase production to cater for the predicted increase in population ("from a global perspective, it is estimated that farmers will have to produce 70% more food by 2050 to meet the world's expected nine billion population" (Office of the Director, Agricultural Development Economic Division, Economic and Social Development 2009))?** **The following paper discusses such issues.** **Does the Energy Transition Affect Food Prices and Agricultural Production? (May 29, 2024)** By Luccas Assis Attilio (Department of Economics, Federal University of Ouro Preto) & Emilson C.D. Silva (Energy Centre and Department of Economics, University of Auckland) "5. Conclusion We investigated the impact of the energy transition on food prices and agricultural production in a sample of OECD countries. Our findings indicate that the energy transition has a negative effect on these variables, leading to increased food prices and reduced agricultural production. Furthermore, we demonstrated that the degree of the energy transition is significant: the more advanced the transition in the energy matrix, the greater its impact on the food market. The contribution to the literature lies in the analysis of the side effects of the energy transition on food markets. While most studies emphasize the benefits of the energy transition, there is a notable gap in research exploring its potential collateral effects. Our results demonstrate that the energy transition is not a neutral process and carries negative consequences. It impacts people's lives. Future research could build upon our results by exploring transmission channels between the energy transition and food markets. We did not delve into frameworks, theories, and rationales describing how the shift to cleaner production might influence food prices. Similarly, monetary incentives were not considered in our analysis. We believe that monetary and economic forces underlie relationships such as the decline in agricultural production due to the energy transition. Additionally, further investigation could scrutinize why advanced stages of the energy transition have a more pronounced effect on food prices and agricultural production. In essence, future research can provide explanations for the results we presented. Rising food prices pose a significant risk to vulnerable populations. Governments can mitigate this situation by offering income transfers to these groups. The studies

	outlined in this paper have demonstrated the influence of government policies on the energy transition. We contend that in tandem with these policies, initiatives and programs aimed at supporting low-income families are imperative. Otherwise, the energy transition may precipitate and exacerbate a social crisis, disproportionately affecting vulnerable populations."
"The Department is satisfied that the project would not fundamentally change the broader landscape characteristics of the area or result in any significant visual impacts on the surrounding non-associated residences."	**The Central West and Orana Regional Plan 2041 states that** "the Central West and Orana region is the vast geographic heart of NSW that balances stunning natural landscapes with vibrant regional cities and centres, historic towns and villages, diverse lifestyles, and community festivals and events." And, "the character and identity of the region is celebrated and protected. Scenic landscapes ranging from the globally recognised Blue Mountains and the western plains to unique local settings such as the communities of Wellington and Coonabarabran which enjoy vistas to Mt Arthur Reserve and the Warrumbungle Range, provide aesthetic, social and economic value to the region." **How will changing the landscape from one of scenic farmland and native bush to an industrial area not "fundamentally change the broader landscape characteristics of the area" nor "result in significant visual impacts for the surrounding non-associated residences"? What impact will the industrialisation of the area have on businesses that rely on tourism for income? Can the Department, and/or proponent, guarantee local businesses, and the mental health of local community members will not be adversely impacted by the change in landscape and visual amenity of the area?** **It is important to note that the signing of a host or neighbour agreement with a wind energy proponent does not indicate there is not a significant visual impact at the associated residence, it is simply a tool used to "mitigate the impact of the project on host and neighbouring landowners" negating the need to consider the impact.**
Site and Surrounds	
"5. The project is located in the Central West region of NSW within the CWO REZ, an area identified as strategically advantageous with strong renewable energy resource potential, proximity to the existing electricity network, and consideration of potential interactions with existing land uses, including agricultural lands and biodiversity conservation."	**The project being within the CWO REZ boundary is not adequate justification for its proposal or approval.** **The current NSW Minister for Energy advised, via Answers to Supplementary Questions raised by Parliamentary Committee 7 through the Budget Estimates Hearing in March 2024, that during the draft CWO REZ declaration exhibition period (17th September – 15th October 2021) there were six supporting submissions received from stakeholders (three from renewable energy developers, two from public authorities and one from an organisation). There were, however, no submissions received from members of the general public suggesting there was a lack of knowledge regarding the aforementioned draft declaration or the CWO REZ in general, given the numbers of submissions being received by the Department of Planning regarding renewable energy generation projects in the past couple of years.** **According to Section 19(4)(b)(iii) of the Electricity Infrastructure Investment Act 2020, the Minister may make a declaration of a Renewable Energy Zone only if the Minister has considered the views of the local community in the renewable energy zone. The lack of submissions from the general public begs the question, especially considering the growing resistance against large-scale renewable energy infrastructure projects within the area, has the NSW Government breached legislation in the declaration of the CWO REZ? Is it acceptable to claim justification of project location on the grounds of a REZ declaration that did not consider the views of the local community?**

	The CWO REZ Regional Reference Group was formed in October 2020 and was, according to information received from EnergyCo within the last month (August 2024), made up of Council's in the Central West region, select electricity providers and the then Department of Regional NSW. Minutes for the forum are not publicly available so it is impossible to ascertain who knew what in relation to the CWO REZ. **EnergyCo, as infrastructure planner for the CWO REZ, is responsible for coordinating the design and rollout of the REZ and working closely with communities, investors and industry. In April 2023 the Central-West Orana REZ Steering Committee was established by EnergyCo to identify community benefit opportunities and strategies to coordinate REZ wide impacts.** **The Whole-of-Government Steering Committee was established by the NSW Government following a recommendation in the NSW Electricity Supply and Reliability Check Up, which was released in September 2023, to coordinate priority areas across the REZ's.** **Despite these two committees, formed to coordinate the priority areas across the REZ's to ameliorate cumulative impacts on affected communities, there is still no coordination by EnergyCo to directly address impacts including accommodation, roads and traffic and emergency and health services.** **When will EnergyCo and/or the NSW Government release detailed and adequate cumulative impact studies and coordinated solutions to the aforementioned cumulative impacts within the CWO REZ to alleviate the burden on affected communities? Should those studies and solutions be available PRIOR TO approval of individual, private CWO REZ renewable energy generation projects so as not to unfairly encumber affected rural areas?**
"11. The site is located within the Macquarie-Bogan River system and extends across the catchments of a number of tributary channels of the Talbragar River. The site is not prone to flooding."	**According to the NSW Governments Water website (water.dpie.nsw.gov.au)** "the Macquarie-Bogan catchment is in the central-west of NSW, and has an area of 74,800 square kilometres. The headwaters of the Macquarie River are in the Great Dividing Range south of Bathurst. The river flows north-westerly until it joins the Barwon River near Brewarrina. Elevations across the catchment range from 1,300 metres in the mountains south of Bathurst, to less than 100 metres near Brewarrina in the catchment's far north. Below Dubbo, the valley mainly comprises flat alluvial plains with elevations less than 300 metres. The Macquarie-Bogan catchment supports a range of water users including local councils, water utilities, dryland agriculture, livestock grazing and some irrigated agriculture, such as cotton. Environmental Values – The Ramsar-listed Macquarie Marshes are located on the Macquarie River between Warren and Carinda. When fully flooded the marsh area covers more than 150,000 hectares and is one of the most important colonial nesting waterbird breeding sites in Australia." **Can the Department and the Applicant guarantee there will be no pollution or contamination of the Macquarie-Bogan River system attributable to the Spicers Creek Wind project throughout construction, operation and decommissioning phases? How will Squadron Energy be held responsible if it is found to be at fault?**
Renewable energy context	
"13. In 2023, NSW derived approximately 36% of	**According to AEMO's National Energy Market (NEM) data, in the 12 months until 10th August 2024, NSW derived 72% of its power from black coal and 2% from gas,**

its electricity from renewable sources. The rest was derived from fossil fuels, including approximately 61% from coal and 3% from gas."	**totalling 74% from fossil fuels. Generation from renewable energy installations totalled 24% - 11% solar, 9% wind and 4% hydro.** **In the 48 hours between 18th-20th August 2024, 75% of NSW's electricity was derived from black coal, and 4% from gas – a total of 79% from fossil fuels. Solar generated 11%, wind 6% and 4% from hydro of power used – a total of 21% from renewable sources.** **In the three months to the 20th August 2024, fossil fuels contributed 79% of electricity to the NSW grid – 76% black coal and 3% gas. Renewable energy made up a total of 20% - 7% solar, 9% wind and 4% hydro.** **Fossil fuels, coal and gas, provide the state of NSW, and the country, with reliable, cheap base load power.** **I understand private large scale renewable energy projects are known to limit, or completely halt, electricity input to the grid due to low electricity prices at peak hours of generation. Is that in the "public interest"?**
Permissibility	
"24. The RU1 and SP2 zone include various land uses that are both permitted with and without consent. Under the Dubbo Regional and Warrumbungle Shire LEP's electricity generating works are not expressly listed as permitted with or without consent, and is therefore a prohibited land use. 25. However, electricity generating works are permissible with consent on any land in a prescribed non-residential zone, including land zoned RU1 and SP2, under clause 2.36 of the State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP). Consequently, the project is permissible with development consent."	**The Warrumbungle Local Environmental Plan 2013 provides a framework that guides planning decisions for the local government area through zoning and development controls. The particular aims of the plan are include:** (c) to encourage the retention of productive rural land for agriculture, (d) to identify, protect, conserve and enhance Warrumbungle's natural assets, (e) to identify and protect Warrumbungle's built cultural heritage assets for future generations, (f) to facilitate the equitable provision of social services and facilities for the community, (g) to provide for future tourist and visitor accommodation in a sustainable manner that is compatible with and will not compromise the natural resource and heritage values of the surrounding area. **The objectives of zone RU1 – Primary Production include:** • to encourage sustainable primary industry production by maintaining and enhancing the natural resource base. • to minimise conflict between land uses within this zone and land uses within adjoining zones. **The Local Environmental Plan was put in place to protect the ratepayers and environment of the Warrumbungle Shire Council - is it acceptable that State policy can simply nullify a local plan; one that is created with local knowledge with local outcomes in mind to protect the immediate, local region?**

Mandatory matters for consideration	
Engagement	
"39. The Department publicly exhibited the EIS from 28 July 2023 until 24 August 2023 (28 days) on the Department's website. 40. The exhibition was advertised in the Dubbo Daily Liberal and Mudgee Guardian and The Australian, the Department wrote directly to landowners up to 8 km from the project site, notifying them of the proposal and exhibition dates. The Department visited the site and surrounds on 16 to 17 October 2023 and 2 February 2024 and met with non-associated landowners." "41. The Department also consulted with relevant councils and government agencies and members of the community during its detailed assessment of the project."	**The Spicers Creek Wind EIS documents totalled 2,988 pages – how is it acceptable to expect project affected members of the general public to read, comprehend and respond to this material adequately in such a short amount of time? Community members often have businesses and/or full time jobs, plus family and volunteer commitments yet to are being expected to manage the extra workload of responding to these documents within 28 days.** **It also needs to be noted that there have been 16 projects within the CWO REZ boundary placed on exhibition between December 2021 and December 2023, including the CWO REZ transmission project (EIS documents for that project alone totalled 7910 pages, not including further reading required to better understand important topics). How are community members, volunteering their time in an effort to protect and preserve their homes, livelihoods, businesses, families, communities and environment, most with little to no experience in submission writing, expected to relay their concerns and adequately respond to paperwork being prepared by industry professionals, whilst being absolutely inundated by the sheer number of projects proposed?** **Did the Department offer to, or actually meet with, any landowners affected by the transport route, especially along the Golden Highway which is a likely transport route for the majority of projects within the CWO REZ, during their visit to the site and surrounds in October 2023 and February 2024?** **Who are the relevant members of the community that the Department consulted with during its detailed assessment of the project? What percentage of landowners affected by the project, whether it be through impacts to transport, traffic and roads, aerial applications for agriculture, those with properties downstream, visual and noise impacts etc., is considered enough for the Department to gain adequate insight about the potential impacts expected to be generated by the project during construction, operation and decommissioning?**
Summary of Public Submissions	
"42. During the exhibition of the application, the Department received 68 public submissions of which 67 were unique (57 objecting to the project, seven in support and three comments).	**Squadron Energy's response to submissions document states the following:** "As outlined in the EIS, there were 28 host agreements in place for the Project. In addition to host agreements, SQE had 28 neighbour agreements (44 dwellings) in place with neighbouring landowners (associated landholders) to address various impacts associated with the Project specific to their dwellings. Since the EIS was exhibited, SQE has secured an additional neighbour agreement with GH008 (refer to Appendix 3). SQE now has 29 neighbour agreements (45 dwellings) in place."

43. The majority (about 85%) of the submissions received during the public exhibition objected to the project. As shown in Table 4, most submissions (52%) came from people living further than 50km from the project site, all of whom objected to the project. However, submissions from people living within 15km of the site were more evenly split with approximately 32% supporting the project."	**Considering Squadron Energy has 57 host and neighbour agreements in place with landowners I wonder why there are only seven submissions in support of the project?** **Whilst most objections to the project came from members of the public who reside more than 50km from the project does the Department consider that a large proportion of those people may be directly affected by potentially negative impacts generated by the project (ie. roads, traffic and transport)?** **The Department has failed to calculate percentages including those submissions received from members of the public who live 15-50km from the project.** **Considering an area within 50km of the project is being inundated with large scale renewable energy developments it is understandable that people within that region would be concerned about potential impacts. 68% of those living within 50km of the project, who made submissions, objected to the proposal, only 21% made supporting statements.** **What percentage of the local population, or number of objecting submissions, meets the threshold of a project not having "social license", or being in the "public interest" in the opinion, or guidelines, for the Department of Planning and IPCn?**
"46. Submissions in support of the project noted various benefits of the project, including the economic benefits of the project, the creation of jobs, financial support to farmers, road upgrades and improvements to road safety conditions and the benefits of renewable energy including improvements to energy security. 47. Submissions commenting on the project raised queries regarding consultation, property value, compensation for impacts to visual amenity and cumulative impacts to rural communities."	**Whilst the Department notes the benefits raised by the submissions in support of the project it does not note the lack of detail and/or evidence provided in comparison with a number of objecting submissions.** **How many of those who wrote submissions in support of the project are currently, or expecting to, benefit financially by its approval and construction?** **The Department also fails to acknowledge the more negative aspects of the submissions lodged as comments by members of the public.**

Assessment Overview	
"55. The Department acknowledges that being located within the CWO REZ, the project has the potential to contribute to some cumulative impacts in the region."	**The project RTS states that** "as outlined above, the Project is strategically located within the CWO REZ, being an area identified by the NSW Government as suitable for renewable energy projects. As a result, it is expected that there will be cumulative visual impacts due to the number of wind and solar projects proposed in the CWO REZ, however, each project will be required to minimise its impacts and implement appropriate mitigation measures." **Are there any cumulative impacts that the Department considers cannot be mitigated? What impacts are too much for the local communities to bear? Members of affected local communities, project neighbouring landowners and those impacted by transport routes, transmission lines requiring compulsory acquisition, potential bushfire risk and limitations to fire fighting, the change of the regions' scenic farmland to an industrial landscape, the risk of negative impacts on water sources and flooding/erosion can all be "adequately mitigated" according to the Department of Planning. Has the Department adequately considered the impacts to the people behind these concerns? The generational farmers who know their land better than anyone, and could not bear to live anywhere else? Community members who have lived in the area for 70 or 80 years, and have seen the best and worst of nature yet still choose to care for their land and produce food and fibre for the general population? Locals who have selflessly risked their lives to save both human and animal lives, and the environment, during the most devastating natural disasters?** **In the event that the IPCn determines approval of the Spicers Creek Wind project, following the Department of Planning's recommendation of approval, who will be accountable for any negative impacts responsible for a loss of income that have been previously raised by concerned local community members, deemed by the consent authorities as mitigatable?** **Spicers Creek Wind Response to Submissions document states on page 195:** "Between 2024 and 2026 there is a significant overlap between the proposed construction phases of projects in the CWO REZ (refer to Figure 4.4) and during this time there would be significant demands for accommodation, labour and employment within the region." **The same document then states the following on page 211:** "Based on the available information at the time of preparing the EIS, a large number of these projects are not anticipated to have overlapping construction periods with the Project." **Could the IPCn commissioners please consider the above contradiction given the Department of Planning clearly failed to do so?**
Energy Transition	
"57. The project aligns with a range of national and state policies, which identify the need to diversify the energy generation mix and reduce the carbon emissions intensity of the grid while	**The Energy Australia website states the following regarding solar two-way charging:** "Two-way charging is a two-way solar tariff for residential and business solar customers. It's designed to: • encourage customer to use the electricity they generate rather than exporting it to the grid, when too much solar is sent back to the grid and/or, • encourage customers to export excess energy generated at times when it's needed the most. The electricity grid was originally designed for us to receive energy to our home and businesses, but now we also export energy from rooftop solar back to the grid.

providing energy security and reliability (see section 3.2)." "59. The ISP also forecasts that there will be a demand for 83 GW of utility-scale wind and solar in the NEM by 2034-35, and 127 GW by 2049-50. It highlights the importance of the resource diversity that will be opened up by the State's REZ network, providing an even mix of wind and solar across the State, noting that wind and solar have complementary daily and seasonal profiles. The project would therefore contribute to replacing the loss of coal-fired generation in the State as well as providing diversification of the generation profile."	In the next decade, the number of homes and businesses in Australia with rooftop solar systems, batteries and electric vehicles will increase. This has resulted in a strain on Australia's electricity grid that was not designed to send electricity two ways. This means the way we manage exporting excess solar energy back to the grid needs to change. In 2021, the Australian Energy Market Commission (AEMC) identified we need to support the integration of rooftop solar more efficiently into the electricity grid. One solution is the introduction of two-way charging." **The Australia Institute's Policy Brief No. 21 states,** "Between January 2000 and June 2009, the Australian Government ran a program that provided rebates to householders and owners of community-use buildings who acquired PV energy systems. Originally called the Photovoltaic Rebate Program (PVRP), it was rebranded the Solar Homes and Communities Program (SHCP) after a change of government in November 2007. Like similar programs in other countries, the official objectives of the PVRP-SHCP were to: • promote the uptake of renewable energy; • reduce greenhouse gas emissions; • help in the development of the Australian PV industry; and • increase public awareness and acceptance of renewable energy. By the end of May 2010, the PRVP-SHCP had supported the installation of 107,752 PV systems across Australia with a combined installed capacity of 128MW. The vast majority (107,081) of the installed systems were for residential users. For much of the PVRP-SCHP's life, it was of a modest size, supporting the installation of around 1,400 systems and 1.8MW of peak capacity a year. However, in its final 18 months, the program experienced exponential growth. Between January 2000 and December 2007, there were 13,538 successful applications, or around 1,700 a year. In the final 18 months of the program, there were over 94,000. Ultimately, this level of public demand was unsustainable and it led to the program's demise. Facing a substantial blowout in costs, the Australian Government terminated the program on 9 June 2009." **According to the Australian Governments Department of Climate Change, Energy, the Environment and Water** "as of 31 October 2023, over 3.5 million rooftop solar PV systems have been installed nationwide, which the Clean Energy Regulator estimates is over 1 in 3 Australian homes." **Australian home owners and businesses have spent the last 20 plus years being persuaded to install rooftop solar systems in the name of reducing greenhouse gas emissions and being environmentally friendly yet, now that the implications of such an energy generation system have been realised ie. too much power being generated during peak sun hours, and not enough during peak energy demand periods, those who have installed solar panels are being punished by the implementation of a "two-way solar tariff".** **If there is too much energy being fed back into the grid from household and business rooftop systems during peak sun hours, which are the same for large-scale solar projects, why is the government investing in schemes to make large-scale renewable energy generation projects viable?**
Biodiversity	
"132. Overall, the Department	**The Biodiversity Offset Scheme allows the devastation of habitat providing existing ecosystems are protected to equalize the destruction. It is my belief that mature**

considers that the biodiversity impacts of the project are acceptable, subject to the implementation of the recommended conditions and offsetting the residual biodiversity impacts of the project."	**trees should have to be replaced by other mature trees ie. prior to destroying one hectare of mature trees there should be one hectare of trees planted, and let mature to the same state as those being removed, not locking trees up that are already contributing to ecosystems.**
Visual	
"138. The Department also notes that the site selection and efforts from Squadron to resolve issues through project design and neighbour agreements has significantly reduced the potential for visual impacts such that there are three non-associated receivers within the black line."	**The Department Assessment Report states** "7. The area surrounding the project site is sparsely populated by neighbours with large land holdings. There are four non-associated residences located within 3.4 km (the black line) of a proposed turbine location." **The above is a very clear contradiction to point 138. Are there three or four non-associated residences within the black line?**
"144. As shown in Table 10, the project would meet all the visual performance objectives in the Visual Bulletin for all receivers. The Department is satisfied that the project is suitable for the site and would not result in any significant visual impacts on the surrounding non-associated receivers." "159. As Squadron lodged the development application for this project prior to the nearby projects, the applicants of the nearby projects	**Whilst the assessment of large-scale wind energy generation projects is undertaken in accordance with the current guidelines it must be noted that they do not adequately protect communities and landowners who value the natural, scenic landscapes in their region.** **The Visual Bulletin states that** "scenic quality refers to the relative scenic or aesthetic value of the landscape based on the relative presence or absence of key landscape features known to be associated with community perceptions of high, moderate or low scenic quality. This can be determined through community perception surveys and consultations using an objective frame of reference. It is both a subjective and complex process undertaken by experts in visual impact assessment, taking into account community values identified in early community consultation." **One of the most common matters raised in submissions objecting to the project was, according to the Department's Assessment Report,** "visual impacts on surrounding landscape and residences, including shadow flicker". **Have there, to date, been any 'community perception surveys' carried out within the CWO REZ with regard to scenic quality? Without this knowledge, how can SQE, or the Department and IPCn gauge, and adequately quantify the visual impact such a project will have on the region?** **The Spicers Creek Wind RTS states that** "… the LVIA indicates that regionally, significant landscape features would remain dominant features of the landscape and it is unlikely the Project would degrade the scenic value of these landscape features. While that is currently the case based on the projects approved or proposed at the time of preparation of the LVIA, it is acknowledged that future projects may have

would be required to include a cumulative impacts assessment with the EIS having regard to existing and approved energy projects located in proximity to their projects, in accordance with the Visual Bulletin and the SSD Guidelines."	further impacts. Each of those projects will be required to assess the cumulative visual impact with the Project and be assessed on their merits." **Should local community members be appeased with an 'unlikely' degradation of the scenic value? Will there be any recompense for the residents of the area if the unlikely degradation becomes reality? Who will be responsible for making such an assessment – local people who value the area?** **Given the scope of proposed projects within the area is it acceptable that Spicers Creek Wind should be given more leniency with regard to cumulative visual impacts due only to the fact the project is further along in the planning stages?**
"166. The Department undertook an assessment of the visual impacts associated with the project's ancillary infrastructure, and considers the project's ancillary infrastructure is unlikely to have a significant visual impact given there are existing transmission lines and agricultural infrastructure in the area, the location of ancillary infrastructure away from non-associated receivers, the intervening topography and vegetation, and Squadron's proposed landscape treatments and selection of ancillary infrastructure components of low visual contrast."	**The Visual Bulletin states that** "vegetation screening, or the planting of trees and shrubs, to visually screen wind turbines or other potential visual impacts from view may be an option for selected viewpoints. However, this mitigation option should not be the first that is considered. A key reason for this is that visual impact issues often cause conflicts between the community or individual residents and the proponent's proposed wind energy project, and people value landscapes and particular views of the landscape. Vegetation screening can potentially remove such views." **Squadron Energy's Response to Submissions states** "mitigation measures (including screen planting) have been recommended for the non-associated dwellings with a potential moderate visual impact rating. These measures are expected to significantly reduce the level of visual impact once established." **What mitigation measures, other than the potential offer of a neighbour agreement which instead of decreasing the impact just provides monetary compensation, did Squadron Energy attempt to implement prior to the suggestion of vegetation screening?** **The LVIA states** "in addition to the proposed wind turbines, the associated infrastructure (as described in Section 3.4 of this report) is likely to contrast with the existing visual landscape. Due to the large scale and elevated siting of the proposed wind farm, access roads, transmission lines and other ancillary structures have the potential to alter the existing visual landscape. An overview of the potential visual impact resulting from associated infrastructure and project components is provided in this section of the report." **Powerlines in existence throughout the Spicers Creek/Elong Elong area, and more generally throughout the region, are commonly distribution lines (typically a single cement or wooden pole approximately 10-15m in height). The overhead transmission line proposed for the project is "up to 330kV", towers for which are typically 50m high. A line of this size also requires a 60m wide cleared easement.** **How can the Department make the comparison between the existing powerlines and agricultural infrastructure, which can only be assumed to be sheds, silos, windmills etc (none of which are remotely close in size to 50m high transmission towers) and suggest this as reasoning for an insignificant visual impact to the region?**
"169. Squadron's LVIA included a Shadow Flicker Assessment, which concluded that the proposed layout would achieve the	**Squadron Energy's Response to Submissions states** "one non-associated dwelling (SL002) was identified in the EIS with potential shadow flicker for 28 hours and 10 minutes per year, however this does not exceed the Bulletin recommendation of 30 hours per year. It is noted that this dwelling is associated with the Cobbora Solar Farm. No other non-associated dwellings are predicted to be impacted by shadow flicker."

recommended limit of 30 hours per year at all non-associated receivers. 170. Notwithstanding, the Department has recommended conditions requiring Squadron to ensure that shadow flicker from turbines does not exceed 30 hours per annum at any non-associated receiver. 171. Blade glint is addressed through Squadron's commitment to using subtle colours and low-reflectivity surface treatment on turbines."	**What is the relevance of the residence referred to above, SL002, being associated with the Cobbora Solar project?** **As a sufferer of migraine and chronic headache it is my belief that shadow flicker and blade glint would both be detrimental to my health, and the health of anyone with a condition triggered or exacerbated by visual and noise stimuli.** **According to the organisation Migraine and Headache Australia common triggers of migraine include sensory triggers - bright/flickering lights, strong smells and loud/jarring sounds. How will Squadron adequately address any adverse impacts on residents in the area found to be suffering from the impacts of shadow flicker, regardless of the number of hours every year it is a problem? What if a person suffers injurious affects whilst working on their property, not in their residence, as a result of Spicers Creek Wind shadow flicker?** **Whilst Squadron has committed to using "subtle colours and low-reflectivity surface treatment on turbines" what will be the consequence/s if blade glint is found to be a problem at any residence in the area?** **It is interesting to note migraine triggers as indicated by Migraine and Headache Australia:** • heightened emotions – stress is the most common emotional trigger but arguments and excitement can also trigger a migraine attack • sleep – lack of sleep and oversleeping can both be triggers • changes in environment – travel, altitude, weather (especially changes in barometric pressure) **Stress and a lack of sleep are associated with contentious large scale energy generation projects. The latter is a potential impact of wind turbines as stated in Squadron Energy's RTS document** "while research efforts in this area are increasing, the assessment of potential micro-climate impacts from wind farms is still limited, however it is important to recognise that the build-up of CO2 in the atmosphere due to the burning of fossil fuels has global and long-term impacts, whereas impacts from wind farms are mostly local and short-term (absent when turbines are turned off). Also, wind turbines do not produce any heat but simply vertically redistribute the heat that is already in the atmosphere, which is fundamentally different from the large-scale cumulative greenhouse warming effect due to increasing greenhouse gases. Renewable wind energy reduces greenhouse gas emissions and thus mitigates global warming." **How will Squadron Energy protect vulnerable community members from adverse health impacts? How will adversely affected community members access assistance?** **Measurements of shadow flicker are only taken from residences – is it acceptable that a farmer, working in their cattle or sheep yards should be exposed to more than 30 hours per year of shadow flicker? Considering the nature of working stock, and their adverse reactions to shadow and shade at times it is insulting to think this has not been considered for the local landowners.**
"176. The Department has recommended conditions requiring Squadron to install aviation hazard	**The Spicers Creek Wind Landscape and Visual Impact Assessment was prepared by Moir Landscape Architecture Pty Ltd, commissioned by Spicers Creek Wind Farm Pty Ltd. It found that** "night lighting of turbines and associated infrastructure has the potential to extend the visual effect into the night time. Aviation hazard lighting has the potential to be visible from distances in excess of 20km (Scottish Natural Heritage, 2017)." "Dark sky is a valued quality of the rural landscape, due to the lack of light

lighting in accordance with CASA recommendations and in a manner that minimises any adverse visual impacts."	pollution. Aviation lighting has the potential to impact on receptors who view the landscape at night, in particular night-sky enthusiasts, photographers, star gazers, campers and some land owners with potential visibility of the turbines hub." **Whereas, the RTS states** "provided that appropriate design principles are incorporated into the night lighting the LVIA found that it is likely there will be no material visual impacts on the existing night time landscape." **Has Squadron Energy accurately represented the Moir Landscape Architecture Landscape and Visual Impact Assessment in the Response to Submissions document?**
"177. The Department is satisfied that the project would not result in significant visual impacts on surrounding non-associated receivers. The project is suitable for the site, would meet the visual performance objectives in the Visual Bulletin and would not materially alter the landscape."	**The project RTS states that** "it is acknowledged that WTGs can create an unavoidable level of visibility and contrast with the natural environment in which they are situated (DPE, 2016)." **And** "the LVIA found that it is inevitable that the placement of large scale WTGs in a rural landscape will alter the existing landscape character of the area to some degree. It is undeniable the Project would become a feature of the visual landscape, however, the LVIA found that it is likely the character of areas which are valued for their high landscape quality and utilised for recreation and tourism will remain intact. The LVIA also found that regionally, significant landscape features would remain dominant features of the landscape and it is unlikely the Project would degrade the scenic value of these landscape features." **Interestingly, the LVIA states** "the fact that the proposed wind turbines are generally positioned within a landscape that has remained largely unchanged for decades means that the potential for contrast is significant. This is little doubt that the project, regardless of how visible it actually is, would become a feature of the area." **Also stated in the RTS is:** "in addition to the proposed wind turbines, the associated infrastructure (including access roads, transmission lines and other ancillary structures) is likely to contrast with the existing visual landscape." **Are all of the above statements enough to suggest to the Department that there will be significant visual impacts?**
<u>Traffic & Transport</u>	
"179. The construction of the project would involve the delivery of large plant, equipment and materials to site including by oversized and over-mass (OSOM) vehicles and heavy vehicles requiring escort which has the potential to impact the local and regional road network."	**The Response to Submissions document states the following:** "Night transport for OSOM vehicles is generally available along the major road network outside urban areas (between 1 am and sunrise or 6 am, whichever is earlier). Transport through any urban areas (eg. Dunedoo, Merriwa) generally occurs during daylight periods. It is a general requirement that if the transport routes pass through any school zones or adjacent to any schools, transport also be restricted to outside school drop-off and pick-up times (8:00 am to 9:30 am and 2:30 pm to 4:00 pm) to prevent conflicts with these activities." **As community members we have always been led to believe, even during intense questioning given the knowledge of previous project transport, that OSOM loads would be transported through Merriwa and Dunedoo overnight. How will the townships of Merriwa and Dunedoo be adequately prepared to manage large numbers of OSOM loads? What compensation will the towns receive for this inconvenience and potential for increased accident/incident risk?** **Squadron's RTS states that** "current 2022 traffic volumes along the minor local road network (e.g. Sweeneys Lane, Tallawonga Road, Binginbar Road and Ben Hoden Road) were not surveyed due to the local nature of the roads (property accesses only), their very minor use and local road closures at some of the locations at the time of the surveys. All these minor access roads are characterised by the 'closed'

	nature, being part of the local rural road network, which results in minimal through traffic flows as well as the limited number of properties that they serve. It is estimated that the average daily traffic along these minor roads is a maximum of approximately 20 vehicles per day. Additional traffic counts are not considered warranted for the minor local road network given the low traffic volumes on these roads." **Traffic volumes for minor local roads are extremely important given the proposed major increase in traffic flow. Will non-associated local road users be compensated for the inconvenience of the use of the otherwise quite, rural roads? How will local road user safety be guaranteed by Squadron Energy?**
"184. The Department notes that EnergyCo has committed to facilitating road upgrades to the State road network between the Port of Newcastle and CWO-REZ."	**The RTS states the following**: "Assorted lay-by areas/rest stops along the designated OSOM and heavy vehicle transport route (Golden Highway) will be utilised to ensure OSOM vehicles do not restrict traffic flow during any bus operation periods." **Specifically, which 'lay-by areas/rest stops' along the Golden Highway will be utilised? The majority of existing rest areas along the Golden Highway would not have sufficient expanse to accommodate loads of the length required for turbine blades.**
"187. The main increase in project related traffic would occur during the 40 month construction period, with a peak period of approximately 6 months for the construction of foundations and delivery of WTG components."	**Spicers Creek RTS states that** "it is acknowledged that, on occasions, local traffic will be inconvenienced however the management measures within the CTMP would endeavour to mitigate impacts as far as practicable." **How, exactly, will impacts to local traffic be mitigated? On Wednesday, 4th September I drove along the Twelve Mile Road, Wuuluman which is currently undergoing major road work to prepare for the Uungula Wind project construction. The inconvenience for local road users is enormous and in my opinion unmitigable.**
"189. Operational traffic is expected to be minimal, with up to 40 light vehicle movements per day, associated with maintenance and monitoring activities."	**Squadron Energy's Response to Submissions states that** "once operational, the Project would be monitored both by on-site staff and through remote monitoring." "Maintenance staff will be on-site throughout the year, making routine checks of the WTGs on an ongoing basis. Major planned servicing would be carried out approximately twice a year on each WTG." "Replacement of major components, such as WTG blades, may require the use of cranes and ancillary equipment." **Does the operational traffic count include transport requirements for the aforementioned replacement of major components? How often are blades replaced and what are the traffic implications of such maintenance works?** **The Response to Submissions also states that** "traffic generation during operations would be minimal resulting in a general maximum of up to approximately 40 trips per day. Consequently, traffic and road network impacts would be negligible during the operational phase." **Whilst 40 trips on a large road network would be considered negligible a 200% increase on current traffic counts is enormous. Can Squadron Energy guarantee the safety of local road users given the increase in traffic for the wind project operation?**

"190. Squadron assessed the traffic impacts of the project in the traffic assessment prepared as part of the EIS. Squadron later provided an updated traffic assessment that accompanied the Submissions report. Squadron assessed the impacts of the project on the intersections and levels of service of the proposed transport routes. The assessment concluded that the levels of service along the rural road network (Golden Highway, Saxa Road, Gollan Road) during the peak construction period would only be marginally reduced, with most roads in the rural road network having significant spare capacity and ability to absorb increased traffic numbers during construction."	**Squadron Energy's RTS states** "Saxa Road, between the Mitchell and Golden Highways, was closed to all traffic except local residents on 5 October 2022 due to several large pavement failures which made the road dangerous. It is understood that Dubbo Regional Council's Infrastructure Delivery team is planning to undertake temporary repairs on the Comobella Bridge, which are programmed to take place in February 2024 at this stage (Dubbo Regional Council, 2023), at which time Saxa Road will be able to re-open to all traffic. Construction for the Project is not expected to commence prior to Saxa Road being re-opened and SQE will continue to liaise with Dubbo Regional Council regarding the status of the road." **At the time of writing this submission, 6th September 2024, Saxa Road remains closed to non-local traffic. According to the Dubbo Regional Council website** "construction of Saxa Road, between the intersection with Wongajong Lane and Comobella, Road is set to commence on Monday, 9 September 2024." **Please see Facebook post below.** **Dubbo Regional Council** August 9 at 3:00 PM · 🚗 COMOBELLA BRIDGE PROJECT SET TO BEGIN 🚗 ❗ UPDATE - 14 August 2024 ❗ With the wet weather that has occurred this week, Saxa Road will be reopened for local traffic with more work to be undertaken on the unsealed section of the detour route. The works on the detour route are expected to take approximately three weeks and Saxa Road will remain open during this time. --- We will be commencing works on the Comobella Bridge construction project on Monday 12 August 2024. 1️⃣ The initial works will include construction of the road approaches, and will be completed in October 2024, weather permitting. 2️⃣ Bridge construction will occur from late October 2024, with completion slated for April 2025, weather permitting. Please keep in mind that Saxa Road remains closed to non-local traffic, with exception for vehicles with destinations on Saxa Road. Further information and updates can be viewed at YourSay 👇 https://yoursay.dubbo.nsw.gov.au/saxa-road-and-comobella... **What if the Saxa Road repairs are not complete prior to construction of the Spicers Creek Wind project?**
"199. Traffic modelling indicates the Golden Highway has sufficient capacity to accommodate construction and operational traffic associated with the project as well as potential cumulative traffic impacts if concurrent construction were to occur with	**The Golden Highway Road Corridor Improvements Business Case was developed by The Stable Group on behalf of RDA Orana and was published in March 2024. The document states** "RDA Orana is a not-for-profit association governed by a regional Board consisting of industry and government representatives whose primary focus is to promote economic development in the Orana region. The Orana Region is the largest and most diverse region in New South Wales, covering 25% of its area and serving a population of over 123,000 people. The main service centre in the region is Dubbo and it is the western starting point of the Golden Highway which is an essential corridor between the Orana Region and the Port of Newcastle and beyond. The Golden Highway (B84) is a 314 km highway and critical corridor which provides a fairly low altitude crossing of the Great Dividing Range. The Golden Highway commences at the intersection with the Newell Highway in Dubbo and heads in an easterly direction through Dunedoo where it is concurrent with the Castlereagh Highway for approximately 10 kms then through Merriwa, Sandy Hollow, Denman,

surrounding State significant projects in the region." "200. Squadron has committed to working with EnergyCo, other projects and road authorities to coordinate transport planning, including scheduling of construction activities and deliveries for the project in consideration of other projects using the same road network, so that any overlap is suitably managed."	Jerry's Plains and Mount Thorley where it terminates at the intersection with the New England Highway before Belford. The highway is subject to higher rates of casualty crashes (those where at least one person sustains a minor injury) than the NSW average. In comparison to the surrounding State roads, the Golden Highway has a lower AADT, necessitating a review of the safety concerns along the highway. The Stable Group, a very strong and trusted team of skilled professionals committed to creating change in Regional Australia, undertook the Orana Hunter Connections and Beyond - Golden Highway Transport Study, a desktop assessment and review of past studies and data on current freight flows and the performance of existing infrastructure. Previous studies on freight network, infrastructure and transport were reviewed to gather data before conducting stakeholder consultation across the region. Extensive consultation with a range of stakeholders including the Port of Newcastle, road users including freight and rail industries, and a Project Reference Group (PRG). Following this extensive process, it was identified that: • In NSW the Central West and Northwest regions are of critical importance as significant generators of Gross State Product. Logistics costs ex-farm gate and ex-mine are highly dependent on reliable and resilient transport networks that provide as direct access to ports as possible. The relevant networks are the Blue Mountains (A32 and Main West Rail) and in combination, the Golden Highway (B84) and part of the Hunter Rail network. • The Golden Highway Corridor (GHC) in conjunction with the Hunter Expressway (M15) facilitates the movement of export commodity flows to Newcastle, and the inbound flow of goods and services across the region. It carries a relatively high proportion (30%) of heavy vehicles. It features very few overtaking lanes, narrow (some very narrow) bridges and inadequate intersections. It should serve as a relief route to and from Sydney when the Great Western Highway/Mitchell Highway is unavailable. • Economic activities between the Orana and Hunter regions continue to expand beyond previous growth estimates. - With many significant infrastructure projects planned in the Orana Region and developments at the Port of Newcastle, the projections are for this to grow at a greater rate in years to come. - Without upgrades, the GHC faces significant challenges, including congestion due to restricted overtaking lanes, safety concerns, and inadequate capacity. - No prior substantial wholistic study has encompassed the entire GHC and highlighted the growth and emerging opportunities across multimodal and intermodal interfaces." **And the following** "The implementation of projects within the Central-West Orana Renewable Energy Zone (CWO-REZ) necessitates the transportation of not only personnel but also substantial components for renewable energy infrastructure from the Port of Newcastle. These components, such as wind turbine parts and transmission transformers, constitute crucial elements of the renewable energy projects in the region. However, the transportation of such oversized and over-mass items is poised to have significant repercussions on vehicular movements along the Golden Highway, extending beyond mere logistical concerns. The shift to renewable energy requires transportation of personnel, equipment and machinery along the GHC. Overall, the actual number of small vehicle and standard truck movements will have minor impacts on the Golden Highway level of service but inherently alters the dynamics of traffic flow and road safety along the transportation route. The nature of these movements introduces unique challenges. Oversize and

	over-mass vehicles, by their very dimensions and weight, impose restrictions on conventional traffic patterns, necessitating adjustments and accommodations from other drivers sharing the road. For example, the components, including parts for wind turbines and transmission transformers, will be transported using oversize and over-mass (OSOM) vehicle movements. Expected movements by vehicle type per month for a 70 wind turbine generator (WTG) project being constructed over 24 months would result in an approximate increase of 130 vehicle movements per day of which 3 or 4 would be OSOM. It is assumed there will be a limit on the number of windfarms that could be in construction at any point in time given supply chain constraints related to workforce availability, component manufacture in addition to port receival and outturn capacity. As these massive components traverse the highways en-route to project sites, they inevitably disrupt the flow of regular traffic, potentially causing delays and congestion. Furthermore, the presence of OSOM vehicles poses heightened risks for accidents and collisions, given their increased size, reduced manoeuvrability, and slower acceleration and deceleration rates compared to standard vehicles. Moreover, the introduction of such OSOM vehicles into the transportation network may inadvertently encourage risky driving behaviours among other motorists. Faced with delays and congestion caused by the movement of these massive components, drivers might resort to aggressive manoeuvres or unsafe overtaking practices in a bid to mitigate travel delays, thus exacerbating the overall risk profile along the Golden Highway." **As a landowner with a property split by the Golden Highway, I have been trying to explain the constraints of the Highway to EnergyCo for more than 18 months – it has fallen on deaf ears to date. It will take years to upgrade the Golden Highway to a state able to facilitate the transport needs of the CWO REZ as currently proposed. I implore the IPCn commissioners to take a deep dive into the Golden Highway as the transport route for the Spicers Creek Wind project and question EnergyCo on its plans and timing for the proposed upgrades.** **If EnergyCo does not facilitate the upgrades needed for transport of components of the Spicers Creek Wind project, will Squadron Energy be financially able to complete the necessary upgrades, and in what timeframe?**
"202. Subject to the recommended conditions, the Department is satisfied that the project would not result in significant impacts on road network capacity, efficiency or safety. 203. The Department considers the proposed transport routes could be appropriately upgraded to facilitate the transportation of large turbine	**The following excerpts have been taken from RDA Orana's Golden Highway Road Corridor Improvements Business Case.** "Where a prima-facie case is not evident to warrant an overtaking lane investment, some other factors could be considered: • Narrow Seal. Car drivers are reluctant to overtake large vehicles on roads with narrow seal width. On sections of road where this is the primary factor contributing to excessive queuing behind large vehicles, the provision of occasional overtaking lanes may be a more cost-effective solution than general seal widening. The Golden Highway is generally of narrow seal pavement. • Crash History. An investigation of crash history may help to decide on marginal cases for improvement. For overtaking lanes, particular attention should be paid to crashes associated with overtaking manoeuvres or where crashes may be attributable to slow moving vehicles. • Percentage of Heavy Vehicles. Construction of passing lanes (sic) should be considered on roads with more than 15% heavy vehicles as defined by Austroads Class 3 and greater. The Golden Highway traffic comprises approximately 30% heavy vehicles.

components to the site. The road upgrades proposed have been developed in consultation with the relevant roads authorities, noting that the final road upgrade works would be subject to detailed design and approval of the road asset manager and/or relevant road authority prior to the implementation of these works or would be upgraded as part of the works to facilitate the renewable energy zones."	On the Golden Highway, safety performance is assessed as marginal due to a combination of narrow pavements, poor ride quality and a significant lack of overtaking opportunities. This situation is exacerbated by a number of very narrow bridges. Apart from some short sections of recent reconstruction, pavement condition is generally poor; not only due to the flooding rains of 2022 but also to the rising proportion of heavy vehicles in total traffic and the increased mass of many heavy vehicles since the road was designed. High heavy-mass frequency and wet conditions invariably cause pavement damage. Major road reconstruction and maintenance in NSW after the 2022 weather events has consumed all of maintenance budgets and most of grant funds released by governments. Current pavement condition generates significant oscillation in higher and heavier vehicles thus increasing the kinematic envelope beyond that underpinning the assumptions adopted for road and bridge design. This is a safety issue. Road maintenance is generally underfunded in NSW. This situation is exacerbated by severe weather events, where urgent repairs have the effect of disrupting planned maintenance and upgrades. Repairs may be classified as minor routine maintenance or short section reconstruction, such as would be necessary if the subgrade requires reforming. Sectional reconstruction can be expected to cost approximately $0.7 million per kilometre for generally flat to undulating terrain. This cost rises sharply with larger culverts and water crossings. The average rate per km would change slightly downwards for larger sections and more sharply upwards for shorter sections. Provision for Over Size Over Mass (OSOM) on GH is confined to Class 9 vehicles (B doubles or equivalent). Renewable energy projects approved for the region and in development will generate a strong demand for OSOM movements with few if any route alternatives. Suggested scope of work to improve function and performance include: • Bridge widening - 4 large bridges (>20m deck length), 11 smaller bridges. • Overtaking lanes - 33 lanes total, 17 eastbound, 16 westbound • Improve 7 intersections. • Improve 4 rail level crossings. • 1 bypass of Denman, Including construction of one new bridge" **Given the above information – will Squadron Energy be liable for any accident caused by, or involving, employees, contractors or project components on the Golden Highway?**
<u>Noise & Vibration</u>	
"Squadron's NIA predicts that noise impacts associated with the project, including consideration of low-frequency noise, would comply with the operational noise criteria for all non-associated receivers."	**How many Squadron Energy, Department of Planning and/or IPCn staff are currently, or will in the future, be forced to live in the vicinity of wind turbines? Whilst classed as anecdotal, many people living near these enormous structures suffer from a lack of sleep, often leading to stress, anxiety and depression. Can Squadron Energy guarantee no landowner or community member will have health difficulties relating to the noise impacts of the Spicers Creek Wind project?** **A neighbouring landowner of Bodangora Wind has recently put their generational farm on the market after years of suffering following the construction of the neighbouring wind project. The impacts of these projects are real and devastating to locals who raised these issues prior to planning approval, but had them**

"In consideration of the above, the Department considers the noise impacts associated with the project are acceptable."	**dismissed. Will lessons be learnt from previous mistakes made during the planning process?**
Agriculture	
"The site is mostly comprised of Class 3 (42%) (moderate capability), Class 5 (45%) (moderate-low capability), and Class 6 (12.6%) (very low capability), and Class 7 (0.4%) (very low capability) land. The disturbance footprint comprises Class 3 (39%) (moderate capability), Class 5 (50%) (moderate-low capability), and Class 6 (11%) (very low capability) land. Squadron would seek to minimise disturbance to areas of Class 3 land as far as practicable."	**Whilst minimal disturbance to the highest land class in the project site is welcome I believe the Department of Planning and IPCn needs to do more investigation into the land classification system and the soils under each category.** **Lower class land is said to be less agriculturally productive, but it is also more prone to degradation, erosion, sedimentation and salinity issues. Disturbing lower class land can be detrimental to the whole area.** **Can the IPCn commissioners please investigate the potential impacts of disturbing lower class land to ensure there will be no major degradation of the entire project site?**
"The development and operation of a wind farm can co-exist with grazing activities. Upon project decommissioning, the land would be rehabilitated. As such, the project would not compromise or significantly diminish the availability of land for primary production purposes within the project site or surrounding LGAs."	**Squadron's RTS states** "During the construction and operation periods it is proposed that agricultural activities will be maintained within the Project Site as the design is compatible with ongoing agricultural land uses on these properties, including sheep and cattle grazing. Once a wind farm is operational, it is highly compatible with agricultural operations. Livestock grazing and cropping can continue right up to the edge of all turbines, hardstands and access tracks. The Project will allow ongoing sustainable primary industry practices and provide diversity in primary industry enterprises appropriate to the area." **Will any landowners be forced to destock during construction given the need for fences to be taken down for the purpose of accessibility for construction equipment? How will paddocks within properties and boundaries with other properties be maintained during this time? Has Squadron Energy, or any independent body, conducted studies to ensure there are no adverse impacts on animal fertility or general livestock health as a result of the addition of large scale renewable energy infrastructure to the landscape?** **The Squadron Energy RTS states that** "the construction of the on-site road network and hardstand areas would result in an approximate 154 km length of access road construction and 117 hardstand areas (one per wind turbine). Assuming an average

	6.0 m wide road formation and 200 mm depth of material for the on-site road network as well as hardstand dimensions of 30 m x 50 m x 300 mm thick, almost 237,000 m3 of material would be required… Importation of road base / gravel material from off-site is likely to occur over 24 months. Based on an average 15 m3 capacity for 'truck'n'dog' transport, some 15,800 loads would be required to be transported to the site resulting in 31,600 heavy vehicle trips over the 24 months. This equates to a maximum of approximately 60 heavy vehicle trips per day and 8 heavy vehicle trips per hour during peak periods." **Given the compaction caused by large construction machinery and heavy loads can Squadron Energy guarantee all areas will be rehabilitated adequately following decommissioning? Where will top soil excavated during construction be stored to reuse following decommissioning or will soil be brought in for rehabilitation purposes? How will Squadron Energy ensure strict biosecurity if the latter is the case?**
Water Supply	
"Squadron confirmed that is it unlikely that the project would intercept an aquifer given the depth to groundwater across the majority of the site is in excess of 20m. Despite this, it is noted that depth to groundwater on the lower slopes of the site, in particular in close proximity to waterways, has been recorded at between 0.5 and 4m below ground level and there is some potential interception of groundwater if excavation were to occur in these areas."	**Squadron must be conditioned so it is not just "unlikely" that the project would intercept an aquifer. Underground water is the lifeblood of agriculture and any incident causing negative impacts to groundwater could devastate a large area.**
Erosion and Sedimentation	

"The site includes areas with highly erodible and potentially dispersive soils. The steep gradients across parts of the site, along with the infrastructure that would cross streams (e.g. access tracks and cables) further add to the potential for erosion of soils and the subsequent water quality impacts in surface water resources."	 **The above photo shows Sandy Creek as an example of the potential for erosion in the area. It is almost impossible to remediate areas like this following events that cause erosion and sedimentation. Squadron Energy must be held to account so as not to cause any soil erosion issues in the area.**
Bushfire risk	
"The development site is mapped as bushfire prone land by the RFS. Squadron would be required to establish Asset Protection Zones around each wind turbine, wind monitoring masts, compound for the operation and maintenance facilities, including substations, in compliance with relevant guidelines."	**The RTS states** "the Project Site will be appropriately maintained over the life of the Project including vegetation and site maintenance required to maintain APZs." **And** "vegetation across the Development Footprint will also be managed to appropriately reduce fuel loads (grassed areas mowed regularly, ground debris removed, trees maintained as required)." **What constitutes 'appropriate' maintenance over the entire project site? Will Squadron Energy be responsible for the whole of project site maintenance?**
"Squadron has committed to compliance with the RFS's *Planning for Bushfire Protection 2019* and the preparation of an Emergency Management Plan to manage fire risks.	**The RTS states that** "in relation to aerial access for fire fighting purposes, the Australasian Fire and Emergency Service Authorities Council Limited (AFAC) has developed a national position on wind farms in relation to bushfire prevention, preparedness, response and recovery which is set out in the Wind Farms and Bushfire Operations (2018) guideline. SQE will prepare and implement a Bushfire Emergency Management Plan as part of the implementation of the Project building on the commitments already made regarding fire safety, ensuring that appropriate on-ground bushfire controls are in place for the Project recognising the potential local limitations associated with aerial fire fighting within the area occupied by the wind farm."

Squadron has also committed to a number of mitigation measures and strategies, including the provision of on-site water supply for firefighting purposes, and appropriate bush fire emergency and evacuation plans."	**AFAC's Wind Farms and Bushfire Operations Guideline Version 3.0 (2018) states** "wind farms may result in aerial firefighting limitations due to aerial obstacles created by wind turbines and meteorological monitoring towers. The bushfire at the Waterloo wind farm demonstrated that if conditions are clear and wind turbines are turned off, wind turbines are clearly visible from aircraft and are not likely to constrain aerial firefighting operations (Clean Energy Council 2017). However, during this event transmission infrastructure, meteorological towers and guy-ropes were difficult to see (Clean Energy Council 2017); this infrastructure does have potential to limit the effectiveness of aerial firefighting operations. Access and egress challenges on the ground as well as water supply issues can also create firefighting limitations, if not planned for appropriately. Wind farms can also impact response operations by interfering with local and regional radio transmissions (Australian Wind Energy Association 2004a). Turbine towers, meteorological monitoring towers and power transmission infrastructure pose risks for aerial firefighting operations. Meteorological monitoring towers and power transmission infrastructure are generally difficult for aerial personnel to see, if they are not marked appropriately. If wind turbines were not shut down, moving blades and wake turbulence would create significant hazards for low flying aircraft, thus the shutting down of wind turbines, in an emergency situation, is defined in wind farm emergency procedures. A wind farm facility's power lines may pose electrocution risks, that are exacerbated due to smoke during a bushfire." **Although, to date, the RFS has not raised any issues regarding aerial fire fighting limitations it is broadly acknowledged in rural areas that large scale renewable energy infrastructure projects WILL impact fire fighting operations. Without aerial assistance ground fire fighting crews will be in more danger.** **What are the safety regulations around fighting fires within wind project sites?**
"The Department is satisfied that the bushfire risks can be suitably controlled through the implementation of standard fire management plans and procedures."	**Squadron's RTS states** "Access will be controlled by locked gates or similar." **Given the above, how will fire fighting crews access the project site in the event of a bushfire emergency?**
Accommodation	
"While the project alone is not expected to result in a significant population change across the Dubbo Regional or Mid Western Regional LGAs, it is likely that the concurrent construction workforces from projects in the CWO REZ may result in	**The SQE RTS states** "as a host LGA for the Project, Warrumbungle Shire has the potential to experience moderate accommodation and employment impacts and opportunities. Warrumbungle Shire has a smaller population than Dubbo Regional with limited capacity to supply labour and services. Despite this, opportunities and impacts will have a larger effect due to the smaller population and scale of concurrent major projects in that LGA." **Was a potential population change in the Warrumbungle Shire Council considered by the Department? There are no regional cities located within the Warrumbungle Shire LGA to adequately cater for large increases in population. Given the saturation of projects clustered around the town of Dunedoo the Warrumbungle region should be adequately scrutinized in regard to cumulative impacts on accommodation.**

cumulative impacts across LGAs."	
"The Accommodation and Employment Strategy identifies that, with the implementation of either of these additional options, there would be sufficient accommodation for the project construction workforce."	**Squadron's Response to Submission states** "the AES has identified capacity for up to 50 beds of short-term accommodation in Dubbo Regional LGA to be used by Project workforce on any given night without negatively impacting tourism and other accommodation users." **Was there adequate consultation with the Dubbo community and business owners prior to making the above assertion? I have spoken to numerous people who have travelled to Dubbo recently and have had issues finding accommodation at short notice.**
Social & Economic	
"Accordingly, the Department considers that the social and economic benefits of the project outweigh the negative social and economic impacts. As such, the project is in the public interest."	**The project RTS states that** "the proposed Planning Agreement for the Project is intended to compensate for environmental, social, and economic costs associated with the Project as to not put an unreasonable onus on the residents and ratepayers of the LGA." **I was under the impression the Planning Agreement payments were a bonus for "hosting" the project within the area – a thank you of sorts for the region assisting the state to transition to renewable energy. Is infrastructure that should be provided as part of paying rates to the Council enough of an incentive given the onus that is being placed on this region? Should the benefits not be more substantial considering the region is being expected to bear the brunt of the renewable energy projects to power metropolitan areas?**
Aviation Safety	
"Squadron undertook an assessment of aviation impacts. The assessment concluded that the project would not have any adverse or significant impacts to air safety, subject to the implementation of mitigation measures and administrative controls."	**According to the Response to Submissions** "… the AIA concluded that based on the risk assessment, it has been concluded that there will be an acceptable level of aviation safety risk associated with the potential for an aircraft collision with the WTGs or wind monitoring tower (WMT), without obstacle lighting on the WTGs and WMTs of the Project. As discussed above, SQE has made additional commitments in relation to the lighting of turbines in response to the CASA submission. With the addition of obstacle lighting, the risk of collision would remain acceptable." **What is considered "acceptable" when it comes to the risk of aircraft collision? How many deaths, serious injuries or near misses, constitutes an "unacceptable risk? Where does the liability lie if there is an aircraft collision involving a wind turbine or WMT tower – is it with the Applicant or the host landowner?** **The RTS also states that** "… the AIA indicates that the presence of a wind farm would likely prevent aerial application operations in that particular area, but safe aerial application operations would still be possible on other parts of properties within the Project Site and neighbouring the Project Site. The use of helicopters enables aerial application operations to be conducted in closer proximity to obstacles than what would be possible with fixed wing aircraft due to their greater manoeuvrability. The AIA does not make any judgement in relation to the use of helicopters, including the effectiveness or costs." **The first statement is quite contradictory. What is the difference between the "particular area" and "other parts of properties within the Project site"? What size exactly is the "particular area" in which aerial operations would be prevented by the wind project?**

	Will Squadron Energy bear any increase in cost for non-associated neighbours, or landowners in the district, forced to engage helicopters for aerial activities as opposed to fixed wing aircraft? And, any increase in cost due to the necessitation of further safety procedures required as a result of the introduction of large scale infrastructure to the district?
"RFS did not raise any concerns about the project, however recommended that the wind farm is obstacle lit, and for blade rotation to cease when arial firefighting is occurring in the locality. The Department has recommended a condition to this effect." "With these conditions, the Department is satisfied that the project is unlikely to result in any significant aviation hazards."	**How many pilots will need to be seriously injured or killed before no aerial firefighting assistance is allowed within areas containing wind turbines, especially REZ's considering the saturation of some areas with renewable energy infrastructure, high voltage transmission lines included?** **I urge the IPCn to research the number of American Agricultural pilots being killed in accidents involving wind turbines and associated infrastructure.** **It is my understanding that the NSW Rural Fire Service does not employ any pilots; all pilots responsible for flying aerial fire fighting sorties are contractors. Please see letter below from a business who contracts to the RFS for aerial fire fighting purposes.** **EAGLE HELICOPTERS PTY LTD** *"Maroombah North"* *2860 Euchareena Rd* *Euchareena NSW 2866* **Ph:** 02 63641144 **Fax:** 02 63641155 **Mobile:** 0427 427 207 **Email:** eagleheli@bigpond.com **web:www.eaglehelicopters.com.au** ***ABN:*** *78 069 785 315* 11th April 2024 To whom it may concern. I David Braid acting as Managing Director and Chief Pilot of Eagle Helicopters. Issue this statement as a directive to all staff Aircrew that whilst participating in aerial firefighting activities do not at any time enter any wind farm whether turbines are static or rotating do not at any time enter the windfarm to conduct aerial fire fighting duties. This directive is active forthwith of the publication of this Letter. Justification of this Company directive That in the event of a fire in the windfarm it is and would be deemed that at no time can or could we 100% guarantee the safe conduct of operations, that would allow operations to be conducted in a safe manner in regard to any incursion with blades towers whilst the effect of bush fire smoke creates a limited view of the working area. David A. Braid ***Managing Director*** **Will areas like the CWO REZ have any pilots willing to risk their lives fighting fires aerially within wind turbines and/or high voltage transmission lines? What will a significant reduction in aerial fire fighting assistance mean for the protection of rural homes, properties, lives and environment? Who will be held responsible for such measures being discontinued in the area to assist ground fire fighting efforts?**
<u>Radiocommunication</u>	

"Electromagnetic signals transmitted for telecommunication systems (such as radio, televisions, mobile phones and mobile/fixed radio transmitters) function most efficiently where a clear line of sight exists between the transmitting and receiving locations. Wind farms and other infrastructure have the potential to cause interference with this line of sight."	**The project RTS states that** "since the EIS was finalised, SQE has been working with telecommunication suppliers to deliver reliable internet bandwidth through a fixed wireless, point to point network across the region. The offering will be deployed and supported professionally by local consultants and technicians. The network coverage area is planned to provide access to as many customers as possible within 20 km of the Project Site. The timeframe for the program has yet to be finalised, but SQE is aiming to have this service available in 2025, if not sooner. This service is intended to be the first of many 'Squadron Link' services to be provided to those living in and around SQE's project sites." **What about those impacted by the transport of components to Squadron's project sites? What telecommunication benefits will they see?** **The Telecommunications Industry Ombudsman's Submission to the 2024 Regional Telecommunications Review in July 2024 states** "through our complaints data, we are uniquely placed to offer insights into the issues being experienced by telco consumers. Between 1 July 2021 to 30 June 2024, we received 51,854 phone and internet complaints from consumers living in regional, rural, and remote Australia (collectively referred to as regional throughout this submission). The complaints to our office show that regional consumers are impacted by faults, poor service quality, poor mobile service coverage, outages, and accessibility barriers. The consequences of a lack of access to reliable telco services can be greater for regional consumers, who face additional challenges in having a fault repaired or gaining access to an alternative service. We also understand these issues are likely to be the tip of the iceberg, with recent research commissioned by the TIO showing that forty-six percent of Australians who experienced a telco challenge in the past 12 months did not lodge a complaint. 1 In some of our complaints, we see consumers let down by a lack of obligations for certain service types, or obligations that apply to parties that consumers do not have direct relationships with. Consumers across Australia, and particularly in regional Australia, need to access and rely on quality telco services that enable them to participate in everyday life." **As discuss above, the decrease in telecommunication service in rural and regional areas is no secret. Given the extra traffic, and risk, being placed on the region as a result of projects such as Spicers Creek Wind would it not be reasonable to expect an increase in service to enable connectivity in the event of an accident?** **I recently put in a complaint to Telstra regarding the decline in service and the outcome is below. It seems congestion is the issue and there are no planned tower upgrades in the area. How will our mobile service fair considering the potential increase in population during the construction of projects like Spicers Creek Wind?**

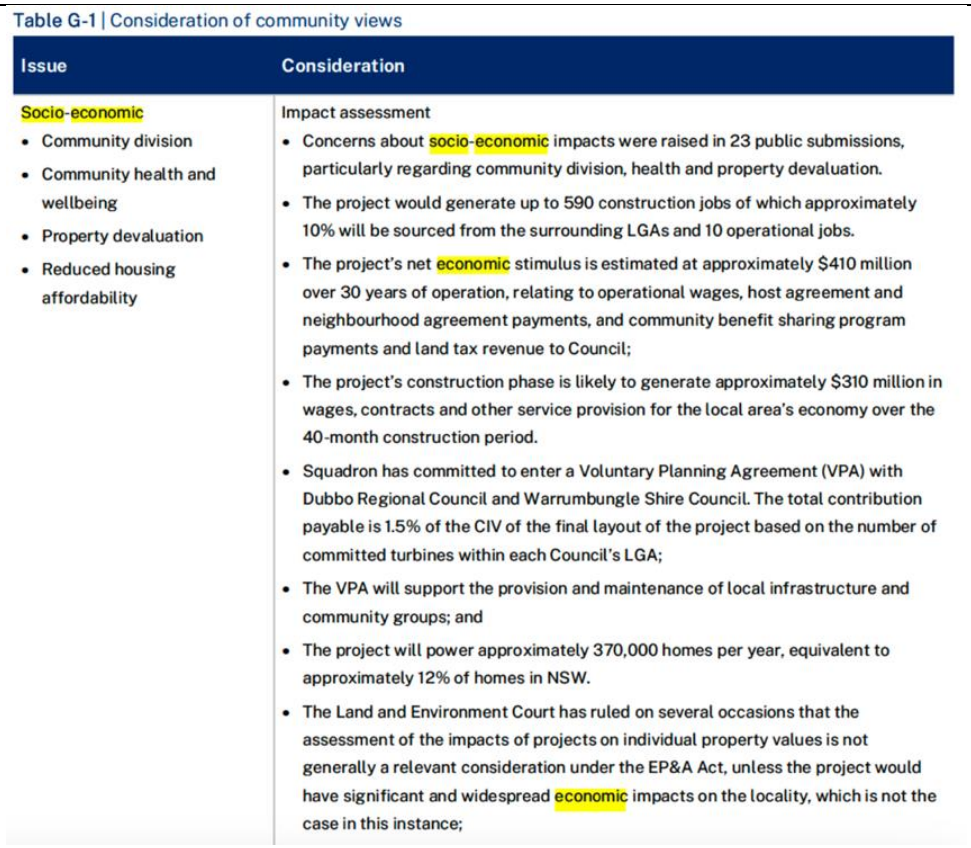
	Dear Emma, **Complaint Reference:** [redacted] Thank you for getting in touch with us on 8 July 2024 about a complaint relating to your Telstra account [redacted] I'm sorry we haven't been able to reach an agreement by offering the following: • Congestion is detected affecting one or more primary serving cells at the specified address. Performance impacts may be experienced. Some congestion is detected on one or more cells the specified mobile service frequently accesses. Performance impacts may be experienced • No tower upgrades are planned or have been recently completed at this address • Advised that cases like this concerning a network congestion, only a tower upgrade can help with the network performance, however unfortunately, we are unable to provide a timeframe as to when this will commence • Advised of external options, but you mentioned that the area is serviceable only by Telstra • Offered to have fixed service to keep up with their means of communication, but you declined • Set expectations that since we are unable to provide a timeframe for a tower upgrade, you can decide whether or not you will keep her service with Telstra. In line with that, as once off adjustment we can offer a 6-month plan adjustment to her account amounting to [redacted] This is the last adjustment that we can offer, moving forward, You will be held liable for your monthly costs • Given that we are unable to provide a timeframe for a tower upgrade, advised that we will close case as unresolved. You have told me that this doesn't meet your expectations as you are still encountering concerns with the mobile service. While it's disappointing that we were unable to resolve your complaint, we are confident that our investigation and proposed resolution are appropriate. As a result, I've recorded these details and closed the case. You may wish to discuss our resolution offer with the Telecommunications Industry Ombudsman (TIO), however if at any stage you decide to accept, please call me on1800 241 787 quoting your complaint case numbe[redacted] **Has there been any investigation into the potential impacts of wind turbines and associated infrastructure on GPS signals? Will Squadron Energy be made responsible for any interference caused by the wind project and be required to rectify any impacted GPS system immediately, at their cost?**
Subdivision	
"The subdivision would create new lots that would not meet the minimum lot size for land use zone RU1-Primary Production and are therefore prohibited under a strict reading of the Warrumbungle LEP and Dubbo Regional LEP."	**I request, as a ratepayer of the Warrumbungle Shire Council, that DPHI and the IPC take a strict reading of the Warrumbungle LEP as I believe the document was intended.**

"The Department is satisfied that the proposed subdivisions are in the public interest, as they would allow the wind farm to be development and consequently provide net benefits to the National Electricity Market that can be realised in a timely manner."	
Waste	
"Noting the above, the Department considers that the waste generated by the project could be appropriately managed."	**How often will turbine blades be replaced? Where will any wind turbine components, replaced during construction or operation, be disposed of?**
Decommissioning and rehabilitation	
"With the implementation of these measures, the Department considers that project infrastructure would be suitably decommissioned, either at the end of the project life or if the project is not operating for more than a year, and the site appropriately rehabilitated to a standard that would allow the ongoing productive use of the land."	**Squadrons Response to Submissions states** "at the end of its operational life, should the Project be decommissioned…" **Does that statement suggest Spicers Creek Wind Farm Pty Ltd is not planning on decommissioning the project?** **Current NSW Premier, Chris Minns, stated the following after questioning from The Hon. Robert Borsak during the Budget Estimates Hearing on Wednesday 21st February 2024:** "**The Hon. ROBERT BORSAK:** Mr Premier, on something totally different, what is your Government doing around decommissioning of renewable energy projects like solar and wind farms when they reach the end of their useful life? **Mr CHRIS MINNS:** That is something that needs to be considered as part of land use changes, particularly for private landholders that assess a proposal from a renewable energy provider. The Government, I understand, has released a calculator so that the landholder has the complete knowledge of what the projected end costs associated with remediating the land would be once the solar project or the wind project has come to the end of life. It's obviously important for the landholders to have that information, because I think that the up-front fee that people receive for hosting or using renewable energy sites on their land is important but they need to know the full picture. If decommissioning is part of that, they've got to be remunerated for it. **The Hon. ROBERT BORSAK:** Yes, that's exactly right. Obviously there are a lot of projects already operational and installed. I think in most cases bonds haven't been paid or there's no money put aside, and a lot of these wind companies and solar companies may well not be there. Do you think the Government will end up having to pick up the tab? **Mr CHRIS MINNS:** No. Obviously best practice is that it's reflected in the original price paid to the owner of the property—remediation costs are part of the price, whether

	it's the yearly fee paid to the landholder or some kind of up-front payment. Where the Government can come in and provide clarity to the land user is to give them the calculator and the information that they need." **Given that the leader of the NSW Government believes landowners will ultimately be responsible for decommissioning of large scale renewable energy projects how will the Department and IPCn guarantee the Spicers Creek Wind project will be decommissioned as required, even if the owner/operator of the project defaults financially?**
Blade throw	
"The Department considers that blade throw risk is acceptable, subject to Squadron's commitment to ensure residences GH005 and TR001 remain vacant for the life of the project."	**Is it acceptable that any non-associated or public property will be subject to the risk of blade throw? I believe to make every effort to combat this risk, Squadron Energy should be conditioned to not place any turbine within a distance of non-associated, or public property (ie.roads) where blade throw could be a hazard. For example, if debris from blade throw incidents is known to be found 1km from the turbine tower, no turbine should be placed within 1km of the project boundary, or within 1km of public property.**
Cumulative impacts	
"Cumulative traffic impacts during the construction phase are a key issue with development within the CWO REZ. The Transport Assessment found that there is ample spare capacity on the local road network for the proposed project, however some upgrades to the local network are required. Squadron has committed to undertake these works in consultation with the relevant roads authorities. These upgrades will improve traffic conditions on the broader road network and provide sufficient capacity for cumulative traffic. The Transport Assessment also found that the	**Cumulative traffic impacts within the CWO REZ are an enormous issue that is yet to be adequately addressed by the infrastructure planner, EnergyCo, or any project proponent. Through my own research, due to the information not being publicly available, I have found that 11 projects in the CWO REZ, out of approximately 40 in the planning process (ie. not yet operating), would create an additional 7058 traffic movements per day (4,588 (65%) light vehicles, 26 shuttle buses and 2,444 (34.6%) heavy vehicles). That is an average of 641 trips per day per project. If you multiply that by the 40 projects (although, granted, they will not all be under construction concurrently and not all will use the same roads – but most heavy vehicles will originate at the Port of Newcastle and use the Golden Highway) that is equal to more than 25,000 traffic movements per day throughout the CWO REZ, and I believe this is a conservative estimation given the projects still not yet publicly announced.** **The CWO REZ transmission project EIS technical paper 13 – traffic & transport assesses the following roads as described below:** **- Golden Highway (near Spring Ridge Road) – bi-directional two lane road (one lane in each direction), ADT = 1,282, lane capacity (vph/lane) = 1,800** **- Bald Hill Road – unsealed, bi-directional two-lane road (one lane in each direction), 100km/h (rural speed limit)** **1,800 vehicles per lane per hour is one vehicle per second on the road – is that safe when you consider the limitations stated in the Golden Highway Business Case, especially the combination of narrow pavements, poor ride quality and a significant lack of overtaking opportunities?** **The current 2022 traffic volumes in the updated traffic assessment conducted by Samsa Consulting on behalf of the Applicant states that there are 960 vehicles per day on the Golden Highway east of Saxa Road (and 102 vehicles per peak hour), 23% of which are heavy vehicles. Interestingly, the Golden Highway Corridor Strategy document states** "average daily traffic (ADT) volumes along the Golden Highway vary in the rural sections from around 5,000 at the eastern end to around

Golden Highway has ample spare capacity to cater for estimated future traffic volumes."	11,000 east of Broke Road, 3,000 at Denman, 1,600 west of Merriwa and 1,500 west of Dunedoo. In the urban centre of Dubbo the average daily traffic volume exceeds 20,000 vehicles per day. The percentage of heavy vehicles along the corridor ranges from 19-21% west of the New England Highway at Belford and east of Dunedoo, decreasing to 12% near Broke Road and Dubbo where there is a higher volume of commuter traffic associated within mining areas and the urban centre of Dubbo, respectively. Annual traffic growth of 2% (linear) has been recorded at the eastern end of the corridor due to the strength of the mining sector, whilst the remainder of the corridor has experienced steady annual growth of between 1-2% (linear)." **Who carried out the traffic count surveys undertaken during mid-August 2022 used to compile the Samsa Consulting report for the Spicers Creek Wind project? Has their accuracy been verified?** **As a landowner who has lived my whole life on a property divided by the Golden Highway (in fact the double Golden/Castlereagh Highway) I have witnessed first hand the enormous increase in traffic over the last 20 years and as a consequence the issues we have walking livestock and machinery across the road – it is an almost daily management issue. There is no way the Golden Highway can handle 1,800 vehicles per lane per hour without causing absolute carnage and mayhem. Could the IPCn please research the implications of the cumulative impacts of the CWO REZ, this project included, on the length of the Golden Highway being used as a transport route for large scale renewable energy infrastructure projects?** **The photos below show Bald Hill Road – as stated above, it is classified as bi-directional with a speed limit of 100km/h by EnergyCo. This is just one example of the misleading classification being undertaken of rural roads to justify the extra traffic that will be a result of the CWO REZ construction, operation and decommissioning.**

	
Evaluation	
"214. The Department considered the submissions made through the exhibition of the project and the issues raised by the community and agencies during consultation. These matters have been addressed through changes to the project and the recommended	**The below table, titled "Consideration of community views" is located in Appendix G of the Departments Assessment Report. I note the Departments "consideration" does not directly address the concerns raised by the public with regard to community division and community health and wellbeing, unless it is being suggested that the potential monetary benefits will mitigate these impacts? How will these concerns be addressed? What will Squadron Energy do to combat and manage community division and health and wellbeing?**

conditions of consent."	Table G-1 | Consideration of community views 
"215. Importantly, the project would assist in transitioning the electricity sector from coal and gas-fired power stations to low emissions sources and is consistent with the goals of the NSW's *Climate Change Policy Framework* and the *Net Zero Plan Stage1: 2020-2030*. It would have a generating capacity of 700MW of clean electricity, which is enough to power approximately 370,000 homes."	**I find it very interesting that part of the Departments justification of project includes transitioning the electricity sector from gas-fired power stations. Squadron Energy already has planning approval for Dubbo Firming Power Station – a firming generation facility able to supply electricity at short notice operating on gas and biofuel, and has another company called Dunedoo Firming Nominees Pty Ltd suggesting could be another firming power station within the CWO REZ.** **Is it acceptable to use transitioning away from gas fired power stations as justification for the Spicers Creek Wind project following approval of a new gas fired power station within the CWO REZ, and with the potential for another going through the planning process?** **From the RTS:** "The Project is expected to produce in excess of 2000 GWh of electricity per annum, at full production at a capacity factor of 33%. The calculation for the homes powered is based on the Australian Energy Regulator's NSW household consumption rate of 5.172 MWh/annum." **SQE advertises project is "expected to power" 397,000 homes – "clean energy to power around 12% of all NSW homes".** **There is a contradiction between the Departments expectation of homes powered compared to the proponents advertisements?** **According to the federal government Clean Energy Regulator website** "the Renewable Energy Target (RET) is an Australian Government scheme that aims to reduce greenhouse gas emissions in the electricity sector and increase renewable electricity generation." "The RET creates a market to incentivise the generation and use of renewable energy." **Each large scale generation certificate (LGC) represents one megawatt hour of renewable energy and acts like a share that can be traded to gain a financial benefit, or used by the company for carbon neutrality or renewable energy purposes. For example, if Squadron Energy's proposed Spicers Creek Wind project is approved, and generates the expected 2 million megawatt hours of**

Issue	Consideration
Socio-economic • Community division • Community health and wellbeing • Property devaluation • Reduced housing affordability	Impact assessment • Concerns about socio-economic impacts were raised in 23 public submissions, particularly regarding community division, health and property devaluation. • The project would generate up to 590 construction jobs of which approximately 10% will be sourced from the surrounding LGAs and 10 operational jobs. • The project's net economic stimulus is estimated at approximately $410 million over 30 years of operation, relating to operational wages, host agreement and neighbourhood agreement payments, and community benefit sharing program payments and land tax revenue to Council; • The project's construction phase is likely to generate approximately $310 million in wages, contracts and other service provision for the local area's economy over the 40-month construction period. • Squadron has committed to enter a Voluntary Planning Agreement (VPA) with Dubbo Regional Council and Warrumbungle Shire Council. The total contribution payable is 1.5% of the CIV of the final layout of the project based on the number of committed turbines within each Council's LGA; • The VPA will support the provision and maintenance of local infrastructure and community groups; and • The project will power approximately 370,000 homes per year, equivalent to approximately 12% of homes in NSW. • The Land and Environment Court has ruled on several occasions that the assessment of the impacts of projects on individual property values is not generally a relevant consideration under the EP&A Act, unless the project would have significant and widespread economic impacts on the locality, which is not the case in this instance;

	energy per annum, the developer would have approximately $90 million worth of large scale generation certificates to sell or trade each year, based on today's prices. In the history of Australia, have any other heavily subsidised industries ever stayed the course? Is this the answer to a sustainable, reliable and affordable energy system or just a money making scheme for big business – is this the real driving force behind large scale renewable energy projects such as Spicers Creek Wind?
"216. The inclusion of a BESS would enable the project to store energy for dispatch to the grid when the wind isn't blowing and/or during periods of peak demand, increasing grid stability and energy security."	**Power from large scale lithium-ion batteries can be rapidly deployed and scalable which offers advantages in managing the intermittency of renewable energy sources like solar and wind energy.** **However, lithium-ion batteries pose inherent risks due to their potential for thermal runaway. The consequences of a battery fire within a BESS can be severe, resulting in substantial property loss, contamination of surroundings and a significant interruption to operations. The nature of these fires also can result in firefighting challenges (traditional fire-fighting methods are mostly inadequate for lithium ion battery fires which are usually left to burn out necessitating substantial volumes of water for cooling surrounding plant to avoid spread resulting in toxic runoff that must be managed to avoid environmental damage), interruption losses (downtime caused by BESS fires has been known to lead to significant financial losses and resuming operations often requires extensive remediation efforts and regulatory approvals), difficulty in determining the cause of the fire (the intense heat of the fires often destroys physical evidence and requires specialist knowledge of battery systems prolonging the investigation process) and specialised disposal of debris (the aftermath of a lithium ion battery fire involves specialist protocols for handling and disposing of hazardous debris).** **How will the Applicant guarantee the safety of local residents, personnel expected to protect the area in the case of an emergency and the environment with regard to the potential risks posed by a battery energy storage system?**
"218. Overall, the Department considers that the project achieves an appropriate balance between maximising the efficiency of the wind resource development and minimising the potential impacts on surrounding land uses and the environment."	**The following was taken directly from the RTS:** "While research efforts in this area are increasing, the assessment of potential micro-climate impacts from wind farms is still limited, however it is important to recognise that the build-up of CO2 in the atmosphere due to the burning of fossil fuels has global and long-term impacts, whereas impacts from wind farms are mostly local and short-term (absent when turbines are turned off). Also, wind turbines do not produce any heat but simply vertically redistribute the heat that is already in the atmosphere, which is fundamentally different from the large-scale cumulative greenhouse warming effect due to increasing greenhouse gases. Renewable wind energy reduces greenhouse gas emissions and thus mitigates global warming." **Firstly, how much research into the assessment of potential micro-climate impacts from wind turbines has been carried out in Australia? Whilst I acknowledge Squadron Energy believes that the impacts from wind projects are "mostly local and short-term", are there safeguards in place to ensure there will be no adverse impacts to the local region, especially for those landowners who object to the project following the construction of the wind turbines in the Spicers Creek Wind project?**
"219. On balance, the Department considers that the project is in the public interest and is approvable, subject to the recommended	**The Response to Submissions states that** "SQE has no authority in relation to the draft guidelines. Regardless, in relation to the Project: • SQE has attempted to be a model proponent • there is not significant opposition to the Project • the Project is considered to be in the public interest." **I do not believe a "model proponent" would create a neighbour agreement worthy of potential class action (according to the former AEIC) due to its terms nor leave a**

conditions of consent (see Appendix E)."	**whole community, especially one closest to the project, off the list for public consultation.** **I believe 85% of public submissions objecting to the project is "significant opposition". If only submissions from people living within 50km of the project site are considered there were objections from 68% - that is two in three people who are opposed to the project. What is the threshold for "significant" when measuring project opposition?** **What does the term "in the public interest" really mean? Are the 57 members of the public who have objected to the Spicers Creek Wind project considered adequately under the term "public interest"? Are the landowners and farmers who have already had and will have their lives, families, homes, businesses and environment adversely impacted by the project considered adequately under the term "public interest"? Is it really acceptable to place the entire burden of energy generation on rural and regional areas, and have the people who provide the country with food and fibre make all of the sacrifices, to service metropolitan areas and deem it for the "greater good"?**

Other issues

Emergency evacuation of workforce from site

Squadron Energy's Response to Submissions states that "buses will leave the subject wind farm construction site for other transport operations once they have dropped off the construction staff in the morning. Buses will then return to pick-up construction staff to transport them back to the temporary accommodation." **In the event of an emergency (ie. bushfire or flooding) how will construction staff be safely evacuated in a timely manner if the buses responsible for worker transport have left the project site? And, in the event that workers are able to be evacuated, where will they be evacuated to (noting that evacuation back to their accommodation facility in Dubbo may not be possible depending on the emergency situation)?**

Community Consultative Committee

It is a recommended condition of consent that there be a Community Consultative Committee operated for the development. According to the Department's Community Consultative Committee Guideline: State Significant Projects (2023) "the proponent must properly consider and respond to issues raised by committee members." **If approval of the project is granted how long will the proponent be granted to publish the request for expressions of interest for community and stakeholder representatives? I note there is a four week minimum for EOI requests, followed by six weeks given until the Planning Secretary appoints the representatives yet no timeframe outlined for the proponents initial role in the process. It is important that the CCC be formed as soon as possible.**
The CCC guidelines also state "the committee may seek annual or one-off funding from the proponent to help it perform its functions. While community and stakeholder group representatives, as volunteers, are not eligible to receive sitting fees from the proponent, they may seek reimbursement for out-of-pocket expenses (such as personal protective equipment for a site visit). The proponent should support any reasonable requests for funding or expenses, where representatives give appropriate reasons and evidence of the costs. If the proponent makes a payment, the recipient should declare this as an interest." **Yet again, community members interested in protecting and proactively seeking benefits for their communities in light of the state significant projects being forced upon the region are doing so at their own cost. When will active community members and landowners be sufficiently remunerated, by project proponents, for the time and effort they put in to reviewing and editing large scale renewable energy infrastructure projects so there is as little impact on the region as possible?**

Submission from SCWF neighbours to IPCn

I note the supporting submission from the Spicers Creek Wind project neighbours to the IPCn regarding the Spicers Creek case. Is a supporting submission from landowners benefitting financially through a neighbour agreement, especially one obviously organised by the proponent of the aforementioned project, considered by the panel as a conflict of interest? Is it acceptable that the proponent organised the supporting submission (ie. wrote the letter that was then signed by neighbouring landowners)?

Neighbour agreements

I have not personally seen Squadron Energy's neighbour agreement but I urge the IPCn commissioners to investigate the claims made by a project neighbouring landowner who refused to sign the agreement offered by SQE. Providing an agreement that prevents local landowners from raising issues/concerns about the project, forces landowners to publicly support the project and takes a caveat over a project neighbouring property does not demonstrate Squadron Energy's claims of being a model proponent. Why can neighbour agreements not simply be compensation paid to landowners depending on their impacts from the renewable energy project, instead of a contractual agreement?

Biosecurity

According to the NSW DPI website "biosecurity is the protection of the economy, environment and community from the negative impacts of pests and diseases, weeds and contaminants." **I do not believe there are any stringent enough recommended conditions of consent to protect the local area from biosecurity threats – how will this be managed to protect other landowners in the vicinity of the project? Will Squadron Energy be liable for any biosecurity issues found to be as a result of the Spicers Creek Wind project? Who will be onsite, at all times, to enforce any biosecurity measures implemented to minimise the risk?**

Public liability insurance

There are great concerns from landowners regarding the potential impacts of neighbouring, and inhabiting a district with, large scale renewable energy infrastructure projects. Will Squadron Energy indemnify any and all external risks if an incident, including a fire event, occurs resulting in any public liability insurance claim?

Spicers Creek Wind Farm Pty Ltd

Spicers Creek Wind Farm Pty Ltd is an Australian Proprietary Company that was registered on 23rd February 2021. Spicers Creek Wind Farm Pty Ltd had 1000 shares issued with a total value of $10 – all shares are held by Squadron Energy Onshore Developments Pty Ltd. Squadron Energy Onshore Developments Pty Ltd also had 1000 shares issued with a total value of $10 – all shares are held by Wind Acquisition 3 Pty Ltd. Squadron Energy Onshore Developments Pty Ltd has the following shares/interests held – Boco Rock Stage Two Pty Ltd, Boorolong Wind Farm Pty Ltd, Squadron Asset Management Pty Ltd, Squadron Renewables Pty Ltd, Guyra Wind Farm Pty Ltd, Hillgrove Wind Farm Pty Ltd, Jeremiah Wind Farm Pty Ltd, Sapphire Battery Company Pty Ltd, Sapphire Solar Farm Pty Ltd, Spicers Creek Wind Farm Pty Ltd, Uungula Solar and Battery Pty Ltd, Saddletop Wind Farm Pty Ltd, Myrtleville Wind Farm Pty Ltd, Dubbo Firming Holding Nominees Pty Ltd, Dunedoo Firming Holdings Pty Ltd, Squadron Vic Holdco Pty Ltd, Koorakee Energy Park Pty Ltd, Illawarra Firming Power Station Pty Ltd, Bookham Wind Farm Pty Ltd, and previously held the following shares/interests – Sapphire Battery Holdings Nominees Pty Ltd, Shannons Flat Wind Farm Pty Ltd, Uungula Wind Farm Pty Ltd. Given the convoluted company situation can host landowners be guaranteed the Applicant will have the funds available to foot the bill for decommissioning of the Spicers Creek Wind project?

Squadron Energy EOI for qualified contractors

On 26th June 2024 Squadron Energy released the news that they were calling for expressions of interest for qualified contractors for the Spicers Creek Wind project, two months prior to the project being approved by the Department of Planning, Housing and Infrastructure and being referred to the Independent Planning Commission for determination. The article on the Squadron Energy website states "following a strategic alliance with GE Vernova in which Squadron Energy has secured an advance order of wind turbines, Squadron Energy is now calling for expressions of interest for a range of work packages on the Spicers Creek project.

The procurement process will run throughout 2024/25 and pending planning approvals and the outcome of the CWO REZ Access Rights process, work on the project is expected to start in 2025/26."

Whilst I acknowledge preparedness is important to make sure developments occur in a timely manner is it somewhat arrogant to offer expressions of interest for work that is not yet approved? Or, does Squadron Energy know something that the greater community are not aware of regarding the approval of the Spicers Creek Wind project?

Impact on local LGA's

Warrumbungle Shire Council (WSC) covers a large geographical area with a relatively small rate payer base and a large number of staff shortages. The CWO REZ, and its associated infrastructure projects, has placed a major burden on WSC office staff since its surprise inception. From the 1st of September 2022 to 25th July 2024 WSC expended $608,120.56 ($71,358.67 in staff costs and $536,761.69 in contractor wages) on matters relating to the REZ. Council has received two payments of $250,000 (in May 2023 and July 2024 - total $500,000) from EnergyCo to assist WSC in addressing REZ related matters. There are no guarantees WSC will receive any more funding from EnergyCo.

I can only assume it will be expected that funds received by Council from proponents will cover the cost borne by Council due to each project (twelve currently on the Planning Portal requiring research and advice regardless of whether the project will go ahead)? Voluntary planning agreement funds should not be used to cover these costs!

Community consultation

The DPHI referred the Spicers Creek Wind project determination to the Independent Planning Commission on 30th July 2024. As community members, we were notified by Squadron Energy of this referral via email at 12.40pm on 30th July 2024 containing a link to the IPCn case page. There were no details on the IPCn case page until after 2pm on August 2nd when it was announced that the public meeting would be held in Dunedoo on August 29th 2024. Not unlike most dealings with renewable energy proponents, EnergyCo and the DPHI, landowners and community members are informed of dates and times of drop in sessions and meetings, not consulted to determine more suitable dates and times. There are members of the community who would've liked to make a presentation at the public meeting in Dunedoo that had annual standing commitments on the day planned for the meeting. Personally, I made a request to the IPCn that I be allowed to pre record a presentation to be played during the public meeting however my request was denied due to the fact I would not be in attendance on the day.

IPCn Project Site Inspection

I note there were no community members in attendance during the IPCn site visit. Were invitations extended and not accepted?

Was more than one non-associated neighbour offered site inspections with the IPCn commissioners? If not, have the IPCn commissioners gained an accurate view of the project from local landowners?

Community support

An article written by Squadron Energy's CEO, Rob Wheals, on 15th August 2024, available on the SQE website, is titled "Community support for renewables isn't bought, it's earned: 20,000 jobs at stake".

The article states "renewables companies who are genuinely working with the regions, where consulting is a two-way conversation, must share their knowledge with the entire industry. There's nothing that country people hate more than being talked at by folks from the city, while not really being able to decide what's best for them locally. At the same time, the renewable energy industry and Governments at all levels need to do a better job of explaining the vast benefits of the transition to clean energy." **Is this article just lip service or genuine thoughts from the CEO of Squadron Energy who is simply unaware of how on the ground company employees are treating community members and landowners affected by the Spicers Creek Wind project? Is the CEO aware that one community in close proximity to the project, Elong Elong, was not fairly consulted prior to the release and exhibition of the EIS? What are the benefits of the clean energy transition to a landowner being forced to neighbour large scale renewable energy infrastructure?**

The article also says "invest in the heart of a community. It is the small community groups, the charities, the sporting clubs and the Landcare groups that are the soul of each local town, so invest in what they need to build their capacity and ensure they are sustainable long term for the community they're in. Put simply, we must put regional communities at the heart of the opportunity and invest not just the money, but also the time, to ensure these once in a generation benefits are realised and shared across the country." **While I agree with the Squadron Energy CEO that is it important to "invest in the heart of a community", financial benefits alone are not going to assist small regional communities in building the capacity of the town and greater area. Rural communities thrive and prosper when the volunteer base is at its strongest. Large scale renewable energy infrastructure projects, like the Spicers Creek Wind project, are causing angst and division within small towns, tearing their volunteer community groups apart, possibly irreparably. How will Squadron Energy assist the rural towns in the CWO REZ, other than monetarily, to repair relationships and community groups to allow the region to thrive and prosper throughout, and beyond, the "rapid transition to renewable energy"?**

<u>DPHI Recommended Conditions of Consent</u>

Condition B1.

"(d) The mitigation measures must be implemented within 12 months of receiving the written request, unless the Planning Secretary agrees otherwise." **Twelve months is a long time for a neighbouring landowner to wait for visual impact mitigation. Could the condition be within 3 months of the landowners written request?**

"Notes:

• *To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of wind turbines from any other locations on the property other than the residence and its curtilage."* **Why is visual impact mitigation only necessary from a residence and its curtilage? Farmers spend large amounts of their days in the paddocks, visual impact assessment and mitigation should apply to entire properties, not just the residence.**

Condition B4.

"The Applicant must ensure that shadow flicker associated with wind turbines does not exceed 30 hours per annum at any non-associated residence." **There should be a zero tolerance policy for shadow flicker at any non-associated residence.**

Condition B6.

"The following activities may be carried out outside the hours specified in condition B5 above:
(a) activities that are inaudible at non-associated residences;" **Who decides what activities are considered inaudible at non-associated residences? Who will police the audibility of such works? What will be the consequences if there are out of hours works carried out deemed audible at non-associated residences?**

Condition B8.
"The Applicant must take all reasonable steps to minimise the noise generated by the development during construction, decommissioning and road upgrade works, including any associated traffic noise."
What are considered "all reasonable steps"? Is the language in this condition enforceable given it is subject to interpretation?

Condition B13. - B16.
Is there noise monitoring assessment carried out at non-associated residences during operation by an independent authority? What is the penalty or consequence of any noise exceedance at a non-associated dwelling?

Condition B17.
"The Applicant must take all reasonable steps to:
(a) minimise the off-site dust, fume and blast emissions of the development; and
(b) minimise the surface disturbance of the site."
Again, this condition uses the wording "all reasonable steps". This is very ambiguous and needs to be more enforceable.

Condition B20.
"The Applicant must:
(a) minimise erosion and control sediment generation;
(d) ensure the concrete batching plants and substation are suitably bunded; and
(e) minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur."
Again, the language is not strong enough; although the condition begins with "the Applicant must" thereafter the words used are "minimised", "suitably" and "as soon a possible". There must be more rigorous conditions to protect the impacted communities and environment.

Condition B29. & B30.
How will the Applicant ensure that all vehicles associated with the development access the site through the designated routes? Will the general public be expected to police the traffic movements attributed to the project?

Condition B32.
Under the "Timing" column in Table 1 of Appendix 7 all upgrades are conditioned to be completed "prior to use by heavy vehicles requiring escort". EnergyCo is currently responsible for all Port to REZ roadworks. **If EnergyCo does not have the road treatments in Table 1 completed prior to Squadron Energy requiring the use of the roads/intersections will Squadron Energy be obliged to complete the works? Who is responsible for enforcing the timing of and treatments required in this condition of consent?**

Condition B33.
"The Applicant must, in consultation with the relevant Council:"
"If there is a dispute between the Applicant and the relevant council about the repair of the above listed roads, then either party may refer the matter to the Planning Secretary for resolution."
Given there will be an additional workload placed on both Warrumbungle Shire Council and Dubbo Regional Council, will the Applicant provide remuneration to both Councils for any time staff spend in relation to the Spicers Creek Wind project?

Condition B34.

Who will be responsible for overseeing all parts of this condition are enforced, and how often will inspections be carried out by an independent party? In the event of a dispute between a landowner and the Applicant (over, for example, internal road construction and/or maintenance) who will be responsible for finding a resolution?

Condition B35.

Again, given there will be an additional workload placed on both Warrumbungle Shire Council and Dubbo Regional Council, will the Applicant provide remuneration to both Councils for any time staff spend in relation to the Spicers Creek Wind project?

Will the driver's code of conduct address any measures surrounding discipline for any drivers found disregarding designated haulage and transport routes and speed limits, not driving safely, or adhering to driver fatigue policy? Will an independent body be responsible for dealing with any incompliance to ensure transparency?

Condition B45.

"The Applicant must:

(a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;

(b) ensure that the development:

(i) complies with the relevant asset protection requirements in the RFS's *Planning for Bushfire Protection 2019* (or equivalent) and *Standards for Asset Protection Zones*;

(ii) is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located adjacent to each substation;

(iii) is managed as an asset protection zone (including the defendable space);

(c) assist the RFS, FRNSW, NPWS and emergency services as much as practicable if there is a fire in the vicinity of the site; and

(d) notify the relevant local emergency management committee following construction of the development, and prior to commencing operations."

How will the Applicant "manage vegetation fuel loads on-site" given the majority of the project site is working farms? Will there be conditions around how much/the length of vegetation/grass allowed to remain on the entire site?

With regard to the recommended capacity of a water tank on site - a 38mm fire fighting nozzle is capable of pumping 280L/minute meaning 20,000L of water would be used in 71 minutes. During most grass or bushfires there are numerous fire fighting trucks and trailers used in an attempt to put the fire out in a timely manner for obvious reasons. An average call out for RFS members would see half a dozen vehicles/trucks attend – six 38mm nozzles would use 20,000L in just over 10 minutes. 20,000L is not enough water to adequately fight, nor black out, even the smallest of fires in rural NSW.

An Asset Protection Zone (APZ) around wind project infrastructure, and the project site, may well assist in protecting those structures from fire, but what/who will protect the surrounding habitat, farming land and communities?

Squadron Energy should be responsible for fire fighting within the vicinity of the site. NSW RFS fire fighters are volunteers, many of whom are objecting to large scale renewable energy infrastructure installations. Fire & Rescue fire fighters, although paid, are local business owners and employees doing their communities a service; they do not need extra call outs, and Dunedoo should not be left without emergency services due to the SQE development. Other emergency services in the region are also stretched; the Spicers Creek Wind project should not be permitted to use any existing local emergency services.

Condition B49.

Exactly how will Squadron Energy have to "consider the cumulative impacts associated with other State significant Projects in the area"? Cumulative impact studies to date with regard to the CWO REZ and "rapid transition to renewable energy" have not adequately considered the impacts on affected landowners and/or communities.

Renewable energy infrastructure projects in the CWO REZ are advertised as benefitting the local workforce. Is it acceptable that the condition of consent only requires Squadron Energy to "investigate" the "options for prioritising the employment of local workers" not making it an essential prerequisite?

Condition B50.

Following rehabilitation and revegetation does the proponent have any obligation to the management of the project site? Ie. If a wind turbine pad is, as conditioned, "covered with soil and/or rock and revegetated" but in following years suffers from erosion or subsidence is there any onus on the proponent to repair such damage for a specific number of years or life?

Condition C14.

Does the Applicant have an obligation to notify the broader community/region of the commencement of construction? Is there any required notification for landowners along the designated transport route?

Condition C16.

"(b) keep this information up to date."

"Up to date" is a very open ended condition. There should be a strict number of days/weeks required in this condition. For example, the condition could read "this information must be uploaded to the Applicant's website no longer than 7 days following any update".

<u>Time Invested</u>

The Central West Orana Renewable Energy Zone has brought with it countless concerns and challenges for local community members, business owners and landowners. The time being poured into research, reading, comprehension, submission writing, meetings and attempting to educate community members is phenomenal. Personally, I have put over 2,000 hours into the aforementioned, all voluntarily, in an attempt to understand the potential implications and protect my home, livelihood, community and environment from any negative impacts as a result of large scale renewable energy infrastructure projects. It is frustrating for those of us willing to invest our time that all the people we are dealing with are being paid handsomely for their time, and we are forced to meet their time frames and put aside our lives, at their convenience, to have any chance of questioning or understanding what is proposed for our region.

According to answers provided by the Energy Corporation of NSW, through Supplementary Questions in the Legislative Council's Inquiry into NSW Government's Use and Management of Consulting Services, "at the time of writing:

(a) the average annual payment to contractors engaged by EnergyCo is $202,967.52,
(b) the average daily rate paid to contractors is $2,267.36 per day (ex GST)"

According to EnergyCo's Annual Report 2022-2023 average remuneration for an Executive Director is $352,329 (of which there are 4) and Director's $242,943 (of which there are 12). In the 2022-2023 financial year EnergyCo spent a total of over $48 million on consultants.

I have not had the time to look into Squadron Energy's financial statements at this time hence the comparison I am drawing with EnergyCo.

Is it acceptable that consultants and employees of renewable energy developing companies are being paid, in some cases, over $280 per day but community members are expected, if they want to learn anything about any project (and it is here I should remind the commissioners that there are over 50

projects operating, under construction and proposed within the CWO REZ boundary – most in a relatively small geographical area) it is on their own dime?
To this end, I hereby give notice of my intention to invoice Squadron Energy, the Department of Planning, Housing and Infrastructure and the Independent Planning Commission for the 67.5 hours I have put into researching, reading and writing this submission. (Please see invoice below.)

Plans to be completed

Construction Environmental Management Plan (CEMP)
Operation Environmental Management Plan (OEMP)
Decommissioning and Rehabilitation Plan
Aviation Lighting Plan
Bird and Bat Adaptive Management Plan
Biodiversity Offset Strategy
Heritage Management Plan (Aboriginal and Historic Cultural Heritage)
CTMP
Traffic Monitoring Program
Soil and Water Management Plan
Erosion and Sediment Control Plan (ESCP)
Dewatering Management Plan
Biosecurity Controls
Biodiversity Management Plan (Aquatic and Terrestrial Ecology)
Bushfire Emergency Management Plan
Traffic Management Plan
Waste Management Plan
Emergency Services Information Package (ESIP)
Emergency Responders Induction Package
Emergency Plan for BESS
Final Hazard Analysis and Fire Safety Study
Employment and Accommodation Strategy

Further recommended conditions of consent

Whilst I would like to reiterate that I do not believe the Spicers Creek Wind project should be approved the following are conditions required if consent is considered:

- **EnergyCo, and DPHI, CWO REZ cumulative impact studies must be completed, and any protections implemented, prior to approval**
- **five years worth of livestock conception and fertility studies completed prior to consent; consent only to be granted if there are no negative impacts observed**
- **any landowner within 50km of the project must be indemnified against insurance liability for any damage caused to the Spicers Creek Wind project**
- **management plans (ie. Emergency Management Plan, Bushfire Emergency Management Plan, Emergency Services Information Package) will be written in consultation with the local employees and/or volunteers of appropriate agencies/departments**
- **the Applicant must have neighbour agreements signed by 90% of direct project area neighbouring landowners signifying their acceptance of the project prior to consent being granted**
- **the Applicant must have a voluntary agreements with over 80% of landowners with a non-associated residence within 2km of the project area prior to consent being granted**
- **proposed visual screening must be completely effective at the end of the construction period and be maintained/replaced by the Applicant for the life of the project**
- **the Applicant will be liable for any stock losses or infrastructure damage caused by a fire originating at the project site regardless of the affected property insurance coverage status**

- **all operational staff will be trained Rural Fire Service volunteers and will be available to assist at any fire within the district (20km radius of project site)**
- **the project site will be protected by two RFS category 1 equivalent fire trucks owned by the Applicant and manned by employees or contractors**
- **there will be an independently employed officer on site at all times during construction to monitor compliance of conditions of consent (ie. road use). Any breaches will result in the cessation of all construction works until investigated and rectified**
- **water testing downstream of the project must be carried out monthly by an independent laboratory, both during construction and operation, to ensure no toxic material is being washed into waterways from wind turbines or associated infrastructure**
- **base line soil testing must be carried out prior to any construction works and then monthly by an independent body, during construction and operation, to ensure there are no adverse impacts to the soil within the project area**
- **any erosion will be rectified at the expense of the Applicant**

Conclusion

"The Department considers the project would not result in any significant impacts on the local community or the environment, is located on a suitable site for a wind farm development, and any residual impacts can be managed through the implementation of the recommended conditions." **What constitutes significant, and to whom? Is it significant that one landowner stated publicly that she, and her husband, are concerned for the future of their children on their generational farm? Is it significant that several families will leave the district if large scale renewable energy developments are built in the region? Is it significant that a landowner has been forced to sell his generational farm because the impacts of living next door to a wind project are too much to bear?**

Concerned local landowners and community members have been raising many of the issues I have outlined above, and more, since members of the public first learned about the proposed Spicers Creek Wind project. The directly affected and broader community believe a lot of these issues have been glossed over, dismissed or inadequately addressed by the proponent and DPHI. The guidelines allow so many crucial details to be finalised post development consent, without community consideration or input – leaving the proponent with various options that members of the public do not get a chance to comment on and potential major impacts to the community unaddressed.

"On balance, the Department considers that the project is in the public interest and is approvable..." **I wonder if 'the public' is considered to be local and directly impacted communities or the public on the eastern side of the Blue Mountains? It seems that rural and regional NSW is bearing the brunt of impacts due to the "rapid transition to renewable energy" and benefitting the least. The impacts are something throwing money at impacted communities cannot rectify.**

I urge the Independent Planning Commissioners tasked with determining the Spicers Creek Wind project to NOT grant consent.

Yours Sincerely,
Emma Bowman

TAX INVOICE

FROM: Emma Bowman
[redacted]
Dunedoo NSW 2844

TO: Squadron Energy Onshore Developments Pty Ltd
Department of Planning, Housing and Infrastructure
Independent Planning Commission

Remuneration owed for time spent responding to DPHI Assessment Report and Recommended Conditions of Consent for Spicers Creek Wind

88.25 hours @ $283.42 per hour
(calculated using EnergyCo's contractor rate & 8 hour days)
(plus time and a half on Saturday and double time on Sunday)

	$25011.82
GST	$ 2501.18
Total owed	**$27513.00**

NB: Please contact [redacted] for bank details for deposit

Log of Hours Spent on Spicers Creek Wind project IPCn submission

31st July – 7.30pm-9.30pm = 2hrs
1st Aug – 6pm-8pm = 2hrs
2nd Aug – 7pm-9pm = 2hrs
3rd Aug – 7pm-8.30pm = 1.5 hrs
4th Aug – 12.30pm-1pm, 2.15pm-3.15pm, 8.30pm-10pm = 3 hrs
5th Aug – 9.30pm-10.30pm = 1hr
7th Aug – 7.30pm-8.30pm = 1hr
8th Aug – 4pm-5pm, 8pm-9.30pm = 2.5hrs
9th Aug – 9pm-10pm = 1hr
10th Aug – 12.30pm–1.30pm, 4.30pm-5.30pm = 2hrs
11th Aug – 6.30pm-10.30pm = 4hrs
12th Aug – 5pm-9pm = 4hrs
13th Aug – 10.30am-1pm, 2pm-4pm = 4.5hrs
15th Aug – 3pm-4pm = 1hr
17th Aug – 8pm-9pm = 1hr
18th Aug – 6.30pm-8pm = 1.5hrs
19th Aug – 8pm-9pm = 1hr
20th Aug – 8.30pm-9.30pm = 1hr
21st Aug – 3pm-4.30pm, 6.30pm-7.30pm, 8.30pm-9.30pm = 3.5 hrs
22nd Aug – 7.30am-8.30am, 3.30pm-4.30pm, 8pm-9pm = 3hrs
25th Aug – 12pm-1pm, 3pm-4.30pm, 6pm-9pm = 5.5hrs
1st Sept – 12pm-1pm, 2pm-4.30pm, 8.30pm-9.30pm = 4.5hrs
2nd Sept – 8.30pm-9.30pm = 1hr
3rd Sept – 7.30pm-9.30pm = 2hrs
4th Sept – 8pm-9.30pm = 1.5hrs
5th Sept – 3.30pm-5pm, 7pm-9.30pm = 4hrs
6th Sept – 9am-10am, 10.30am-1pm, 2pm-5pm = 6.5hrs