Submission No 30

INQUIRY INTO IMPACT OF RENEWABLE ENERGY ZONES (REZ) ON RURAL AND REGIONAL COMMUNITIES AND INDUSTRIES IN NEW SOUTH WALES

Organisation: CWO REZist Inc.

Date Received: 30 January 2025

CWO REZist Inc.
c/- PO Box 2
Coolah NSW 2843

30 January 2025

CWO REZist Inc. submits the following points addressing the Portfolio Committee No. 4 - Regional NSW Inquiry on the Impact of Renewable Energy Zones (REZ) on rural and regional communities and industries in NSW.

(a) current and projected socioeconomic, cultural, agricultural and environmental impacts of projects within renewable energy zones in New South Wales including the cumulative impacts

The negative impact to landowners, residents and communities are massive. Energy Co's Central West Orana (CWO) REZ Transmission project Environment Impact Study (EIS), Technical Paper 3 states that, for example, the Neeleys Lane camp will be removed from the RV-4 rural valley character zone. What impact will that have on property value for landowners in that area?

It also stated "In the Talbragar River (RV-3) and Munmurra River (RV-4) rural valley landscape character zones, the project would be a new feature, introducing large-scale transmission towers into these rural valley landscapes. The transmission lines would cross the Talbragar River and several creeks, roads, and across rural properties. **The character of these rural valleys is scenic, contributing to the landscape setting of towns such as Cassilis. Overall, there would be a high magnitude of change and a moderate landscape character impact in these landscape character zones during operation." Therefore, the scenic value will be lowered and EVERY landowner, whether forced to host these monstrosities or not, will have their property values reduced. EVERY landowner that has even a portion of a tower visible should be compensated to the loss of property value.**

The CEO of the government's Clean Energy Finance Corporation, Ian Learmonth, had to concede on ABC Radio National in 2024, that the eastern Australian landscape will look radically different "if we're going to get to 82% renewables by 2030…We're going to need the right infrastructure to capture that energy, and therefore, there will be an impact". Yet we, as residents of the CWO REZ are expected to just accept it?

Section 20.2.2 of the Energy Co EIS, clearly stated **that the CWO REZ will be impacted by the multiple wind/solar/transmission projects that "would introduce energy and electricity infrastructure, access tracks and upgraded roads into a landscape where there is currently limited built development …. This infrastructure would change the landscape character to**

one where the presence of energy and electricity infrastructure is more frequently encountered and prominent, resulting in a cumulative landscape character impact."

This section on cumulative impacts finally acknowledged, in print, the extensive negative impacts that will occur from the cumulative projects currently in some stage of the approval process in the CWO REZ.

The residents of the CWO REZ have realised that their visual amenity would be severely affected by being placed within a REZ. Visual amenity enables the residents to enjoy their surroundings and homes, looking out at the currently peaceful rural vistas of farmland, bushland, ridgelines, rolling hills and wooded areas of the Great Dividing Range.

The developers (both wind and solar) continually state that their projects will have minimal impact on the landscape and try to avoid responsibility for any cumulative negative impact with other projects (even though required to by DPE). This might ALMOST be the case for a project in isolation, but being in a REZ situation, we were aware it would change to an industrial landscape.

DPE have stated in the solar guidelines that a REZ is a "modern day power station" and this is something that the residents of the CWO REZ never agreed to. We were never asked. We were never directly notified or consulted. The State Govt. declared the Electricity Infrastructure Investment Bill in November 2020, passing it in 17 days whilst most of the residents were under COVID restrictions. How is that acceptable?

Energy Co has at last put in writing that our visual amenity WILL be negatively impacted both during construction and operational periods.

Energy Co states "If approved, there would likely be cumulative landscape and visual impacts associated with this project and the relevant future projects, due to the proximity and associated potential for the projects to be seen together and change the character of the surrounding landscape".

And

"Construction periods of relevant future projects near the northeastern, central and western sections of this project are likely to overlap with this project over several years. Construction activities for the relevant future projects and this project would extend across large areas of the landscape and would contrast with the rural amenity and scenic quality of the existing rural landscape. These activities would be seen from several dwellings and local roads, including at night where construction lighting is required.

The most substantial cumulative landscape character and visual impacts would be experienced

- in the landscapes between Gulgong and Dunedoo

- between Tallawang and Spicers Creek (the central and western sections of the project), where multiple renewable energy projects are proposed in combination with this project
- in the landscapes between Cassilis and Leadville (the northeastern section of the project), where two large wind farm projects are proposed in combination with this project.

Views of these projects would be prominent and contrast with the undulating rural and forested hills of the surrounding landscape, including at night, when some private dwellings would have views of operational lighting at switching stations, energy hubs and operations and maintenance buildings".

And

"This infrastructure would change the landscape character to one where the presence of energy and electricity infrastructure is more frequently encountered and prominent, resulting in a cumulative landscape character impact"

And there it is, admitted in black and white, that it WILL change the character of the landscape from rural to one of multiple types of electricity generators and infrastructure.

The cumulative impacts are too great on the residents of the REZ, and these are insurmountable. The REZ was ill-conceived and the reality of a REZ was not thought through by the obviously urban dweller who dreamt the idea up.

This confirmed a marked negative impact on visual amenity for rural residents of the REZ. This will lower resident's quality of life and enjoyment of their home and has and will continue to negatively affect their property values.

Colloquial reports from both Australia and overseas state that properties with high voltage transmission lines take much longer to sell and attract a lower price than those without such transmission lines. Banks are also less likely to lend money to purchase properties with high voltage transmission lines.

Similarly, internationally, neighbours to wind turbines also have difficulty selling and often at lower prices. Australia has only recently increased operating wind projects and so Australian evidence is limited. We have spoken to realtors in the CWO REZ, near operating and proposed wind projects who state that properties neighbouring turbine projects take much longer to sell and do not benefit from rises in the market.

The Urbis report that the Government repeatedly quotes is inadequate in the number of properties and the time period it covers. A landowner, Nigel Wood, expended much effort, unpaid, to providing an updated extension to the Urbis report to the Department of Planning, proving a loss in property values, which has been repeatedly ignored. As is anything we provide or say.

Property value loss rates high on people's concerns. As well as dramatically reducing the enjoyment of our homes and properties, by changing the landscape character and rural peace and quiet, our property values will accordingly decrease. Energy Co's CWO REZ transmission project enables multiple projects to proceed (once approved) moving the negative amenity impacts from an isolated project to a cumulative effect over hundreds of kilometres. Property value loss is a threat to the whole of the 20,000sq km district designated as the CWO REZ.

Biodiversity in NSW is under significant threat by multiple renewable energy projects.

The CWO Transmission Project EIS admitted "The direct cumulative impact on native vegetation as a result of this project, in combination with the relevant future projects, is estimated to be 9,859.21 hectares. The cumulative ecosystem credit requirement is 147,215.25 credits and the cumulative species credit requirement is 305,854 credits." Biodiversity credits of this volume are impossible to offset and appear to only be a money grab without seriously considering the environment.

Energy Co. also admitted that current wildlife corridors will be removed/affected and state that 1032 ha of native vegetation (and habitat) will be directly impacted **"The relevant future projects are likely to reduce the integrity of current corridors and connectivity. The projects are likely to result in short term impacts due to species relocating outside of the development footprints during vegetation removal and other construction activities... Long term impacts could include permanent breaks in connectivity due to vegetation removal and the installation of fence lines and access roads across relatively large intact blocks of habitat. The wind farm projects would also result in some interruption of aerial habitat through the introduction of potential turbine strike and barotrauma (rapid or excessive air-pressure change near moving turbine blades that result in hemorrhaging of the lungs). This project would contribute to cumulative impacts to wildlife connectivity and habitat corridors and would potentially have one of the largest impacts to connectivity."** This is unacceptable to the community and the native flora and fauna, including threatened and endangered species and those that will become threatened and endangered as a result of the cumulative environmental impacts of the Central West Orana REZ.

Once again, the CWO REZ Transmission EIS states **"This project, in combination with the relevant future projects, would result in a potential cumulative loss of between five to 16 per cent of the Aboriginal site types identified within the construction area of this project, which include rock shelters, grinding grooves, culturally modified trees and moderate or high significant stone artefact deposits."**

It also included a poor attempt at deflecting responsibility for this, by suggesting that whilst cultural materials would be lost, it's becoming "more holistic condition of heritage". This is nothing more than an excuse to destroy Aboriginal heritage. All Aboriginal sites should be

preserved, we do not want a repeat of Rio Tinto's destruction of an aboriginal heritage site in Western Australia in 2020.

Many places of local cultural interest are not surveyed, relying on desk top modelling and potentially ignoring community history studies that list places of historical interest. Many sites are delicate and will be impacted by construction activities, such as vibration which may collapse and/or destroy the sites. We have been advised by a professional historian/archaeologist that many developers, including Energy Co, do not recommend sufficient protection for historical sites and have several inaccuracies in methodologies.

The Wiradjuri nation was split and sub-split into many tribes. According to oral tradition, in Mudgee, the Mowgee clan extended over a 50 km radius. The Mowgee women's totem is the wedge tail eagle (Mullian) and the men's totem the crow (Waggan) (Wiradjuri Nation | Mudgee Museum). Wedge-tail eagles are not only animals of cultural significance to the local Wiradjuri people of the Central West, they are also the Apex Predator for the area. Covering ridgeline habitats with wind turbines, where wedge-tailed eagles use the updrafts to hunt and play and building massive transmission towers/lines will have a significant impact on the local wedge-tail eagle population likely rendering them threatened/endangered. The flow on effects include upending the ecosystem balance of the Central West Orana area, including a significant increase in feral animals.

There will be little benefit to the region during construction apart from minimal flow-on effects from the 90% fly-in, fly-out workforce, living in accommodation camps. During operation there is a statement that it is assumed that perhaps, a couple of hundred staff over multiple projects will reside in the region, however this is not guaranteed, and those personnel may indeed reside outside of the region with no flow on benefits, for even this small amount, to the local economy. The operation of the workers camp may benefit local businesses by the supply of goods, but even the CWO REZ Transmission EIS states "there may be a limit to local procurement because of local unavailability of required inputs". Clearly, local businesses will not benefit.

Conversely the costs to the local economy will be high. Construction activities will reduce the land available for agriculture as will the installed infrastructure and associated roads. Local workers may be lured away from the agricultural sector to work on REZ infrastructure, impacting Agricultural productivity in the region.

For the CWO REZ Transmission project alone, it estimated $1.35million for each year of construction (up to 4 years), a total of $5.4 million. Once operational, lost agricultural income has been estimated at $317,550 per annum. When talking of a project of this size, this seems a small amount, yet to those farmers impacted, this is a substantial reduction to their income, which is not being covered adequately by the so-called compensation.

We had the hand waving Mike Young from Energy Co, telling local landowners that there will not be any impact to farming practices in/near transmission towers/lines. Perhaps he should read his company's literature that restricts many activities.

Considering these restrictions, the estimates of lost production to farmers during construction and operation are underestimated if the only agricultural practice that can be undertaken within the easements is livestock grazing.

The Energy Co CWO REZ Transmission project EIS identified an estimated 10 projects using the same road network as Energy Co. at a similar time. Numbers are only provided for 6 projects. For those projects alone (not including Energy Co's estimate of an additional 100 vehicle movements PER HOUR), during the construction period, there will be an additional 2307 vehicle movements per day on the local roads. If we add in Energy Co's estimate for a 12-hour day, there could be an additional 3500 vehicles per day on local road PLUS the FOUR other projects that no numbers were provided for. It is reasonable to estimate that these 10 projects and Energy Co will bring an additional 5000 vehicle movements per day during the construction period.

The CWO REZ already experiences delays from OSOM vehicles with large mining equipment, regularly having to travel for 20-30km behind OSOM vehicles before a suitable pull over space allows overtaking. If the OSOM vehicle is oncoming, drivers frequently must move onto the unpaved verge and wait for the OSOM vehicle to pass. This is already a contentious issue in communities and many are just starting to realise what the reality of the traffic from the REZ construction will mean for years to come.

This will result in extensive road congestion on all affected roads, residents will face multiple delays, the risk of accidents will increase and transporting livestock and grain will become more costly with the added time delays.

(b) current and projected considerations needed with regards to fire risk, management and containment and potential implications on insurance for land holders and/or project proponents in and around Renewable Energy Zones

Current and accepted guidelines for aerial firefighting do not adequately address the realities of aerial firefighting around large infrastructure such as 250m-300m high wind turbines located on top of ridgelines, posing either a high collision risk endangering aircraft and crew lives or negating the use of aerial support in areas that include wind turbines.

The current guidelines rely heavily on AFAC's recommendation in Wind Farms & Bushfire Operations (2018), which is based on an example of aerial firefighting support in the article "In case of fire: a real-life experience at a wind farm site" on the Clean Energy Council website in 2017. **NOTE: Clean Energy Council members are companies who work in or support the clean energy sector to promote and accelerate renewables in Australia. This is**

an INDUSTRY BODY, therefore their suggestions and advocacy is to benefit their members, not the general Australian population.

This fire cited was a **grass fire**, not a bushfire. Grass fires do not create large billowing amounts of smoke and a pilot can retain some visibility. **The landowner** adjacent to the Waterloo wind project **was also the fire captain**. The fire **was on flat land with a single ridge** (not hilly terrain) in a north-south direction, it was reported as soon as it occurred and **only affected 50 hectares** of land. **The turbines** concerned with the wind project involved are placed in a **single line**, **125m tall**, situated on the single north-south ridge with cropping country on the east and west. The fixed wing aircraft performing aerial firefighting were cropdusters, highly maneuverable small aircraft with a wingspan of approximately 15m.

Water bombing aircraft often operate below 200ft to successfully drop water or retardant on their target. Small crop-dusting type aircraft would have negotiated the 200-250m (approx.) gaps between the turbines in low-smoke conditions, however it **would be too dangerous for larger tankers to attempt, even in good visibility, regardless of the position of the wind turbine blades.**

In the CWO REZ, where the majority of land would be classified as Vegetation Category 1 Bush Fire Prone Land in accordance with the NSW Rural Fire Service - Guide for bush fire prone land mapping, 2015, turbines are planned to be in expansive clusters along hilly vegetated ridges and high ground. The terrain over half of the CWO REZ is hilly and there is a large amount of native bush on the hills and ridges. Most fires that require aerial support are bush fires on hilly terrain that create large amounts of heavy smoke.

A major bushfire in the CWO REZ in 2017 burnt 55,000 hectares and would not have been able to be extinguished without aerial firefighting support. If the planned 250m high turbines had already been built at the time of that fire, the large aircraft used would not have been able to maneuver safely between the myriad of wind turbines or get low enough to effectively drop retardant/water. The results to our communities would have been even more devastating.

Turbines are also proposed around major water sources used for aerial firefighting such as Burrendong Dam, which will create further barriers for any aerial firefighting to protect lives and properties in the future.

We have letters from two air operators that have instructed their pilots not to go anywhere near wind projects due to safety concerns.

We have repeatedly written to the Department of Planning in various submissions, to the Planning Minister via our local representative and to numerous Independent Planning Commissions. Yet no one has heeded our concerns.

We can provide copies of the letters from air operators and videos of aerial firefighting to illustrate how close to the ground these aircraft operate and that reasonable safety precautions by the air operators will preclude the use of aerial firefighting support.

It is only a matter of time before citizens lives will be lost due to restricted aerial firefighting abilities in the CWO REZ if the NSW Government continues to turn a blind eye to this preventable tragedy.

There are many concerns regarding insurance liability that have not been adequately addressed by the Government or the proponents of "renewable" projects. If neighbours (farmers) need to indemnify their businesses with insurance, the premiums are so excessive that they would effectively put the farmer out of business, even if premiums of a high enough level could be obtained. In our litigious society, neighbours have every right to be worried over a multinational corporation on their doorstep.

(d) proposed compensation to regional New South Wales residents impacted by Renewable Energy Zone transmission lines:

(i) adequacy of compensation currently being offered for hosting transmission lines

Compensation is inadequate for the amount of impact on the landowners.

"Hosts" were not considered fully as they are considered to "have negotiated landholder agreements that would form compensation from the impacts of the project". Yet the hosts are, for the major part, not hosts by choice, but rather hosts by force.

The compensation they offered was paltry in comparison to the loss of visual amenity and loss of property value by being forced to host the infrastructure. Hosts should still be considered for visual impact.

Compensation by Energy Co for transmission was limited to
*an estimate of the market value of the land covered by the easement at the time of the easement acquisition,
*reimbursement of legal and valuation costs, and
*devaluation of adjoining land as at the date of the acquisition.

No compensation was offered for construction activities or, for example, being located near an Accommodation Camp. Energy Co employees told landowners this has to be negotiated with the company engaged to erect the infrastructure **at a later date**, after the property has a **permanent** easement over it and the easement has been acquired, by fair means or foul (threatened by compulsory acquisition under less favorable terms).

The much touted $10,000 per km of transmission lines, only pertain to those with lengthy lines on their property, not those with just a high transmission tower or two.

The Energy Co CWO REZ Transmission project's EIS, states in Section 7.3.2 that "around 72 per cent of the construction area consists of agricultural land used for the grazing of native and modified pasture. Around an additional 20 percent of the construction area consists of agricultural land used for cropping." Given the restrictions on agricultural production activities imposed by the easement,

(https://www.energyco.nsw.gov.au/sites/default/files/2022-09/cwo-rez-fact-sheet-easement-acquisition.pdf)

this will negatively affect landowner's ability to crop, improve pasture, erect fencing and more. 775 hectares of cropping ground (table 7-3) will be taken out of production (not including construction activities), affecting those landowner's ability to produce food and earn an income from those 775 hectares for over 50 years.

Many farmers whilst they do not farm a paddock with machinery every year, often do this occasionally to improve the pasture for grazing – this will be curtailed by the easement conditions. After time, the 1660 hectares quoted in the EIS of currently modified pasture will become less productive without the ability to improve it (with machinery) for the life of the transmission towers. The landowner will therefore, over time, earn less from this land.

The "compensation" offered to hosts is inadequate considering this.

The acquisition process proceeded prior to project approval. "Negotiation" with many of the landowners was in name only. Energy Co stated "Where possible, easements and land acquisition has been through negotiated agreement in consultation with the relevant landowners". "Where possible" was obsolete. Either they undertook a negotiated agreement in consultation, or they refused. **Our members advised us that they felt threatened by the compulsory acquisition process and under coercive behavior by Energy Co to sign before the imposed compulsory acquisition process deadline.**

Energy Co also stated "During construction, temporary restrictions would be put in place within the construction area, which have the potential to restrict landowner access to sections of their properties." This was never laid out in detail in the easement documentation. How is that above board and fair? The Property Management Plans mentioned in section 21.4 of the EIS were also not included in the acquisition correspondence telling landowners these will only be discussed prior to construction – so Energy Co expected landowners to agree to an easement without full disclosure.

One landowner in the CWO REZ had the major portion of his land dissected by twin 500kv lines with huge easements. The land was rotationally used for haymaking and grazing. He would have been unable to easily access half of the property cut off without going on to a main road and around. The loss of production was high. He was an unwilling host, like most being forced into this situation with the threat of compulsory acquisition with the proffered compensation which only considered direct land loss, wholly inadequate.

Compensation figures to landowners needs to be reassessed with these restrictions in mind.

(d)(ii) adequacy of the shared benefits being offered to neighbours of large-scale renewable projects

Neighbouring agreement are not standardized and some landowners do not understand the implications or that they can negotiate. Neighbours who oppose the project do not receive any direct/individual benefits above the general "community" benefits, even though they bear most of the impacts.

Shared "Community" benefits can be spent anywhere in the local government area, not benefiting neighbouring landowners whose properties are directly impacted by the adjoining project/s.

(d)(iv) tax implications resulting from compensation received by impacted residents

There does not appear to be a standard way of dealing with compensation for easement acquisition, or for those forced into receiving it under compulsory acquisition.

Compensation received by impacted neighbouring residents located within a REZ should not be taxed. Their property values and enjoyment of their properties have already been devastated by being forcibly located within a REZ without their direct notification nor consent.

(f) current and projected supply and demand levels of manufactured products, raw materials, and human resources required for completion of Renewable Energy Zones and their source

Energy Co's CWO REZ Transmission EIS suggests that prices may be pushed higher from "excess demands for resources for construction, such as quarry materials, concrete, and other construction materials" resulting in "rising costs for these resources and potentially shortages for other uses". In an economy already struggling with rising prices, the additional pressure from multiple projects planned for the CWO REZ, in addition to the Energy Co. proposal, will make these costs substantially higher for residents of the region.

Mid-Western Regional Council has undertaken a study on this and has identified the area does not have water and sewer infrastructure, nor waste facilities, accommodation and social services such as police, hospital staff/infrastructure etc to cope with the huge increase in industrial activity and influx of workers into the area as a result of the CWO REZ.

(g) projected impact on visitation to regional areas with renewable energy zones resulting from changes to land use

The transition from predominately rural landscapes and dark night sky to one that has been

industrialised with thousands of lit up and noisy wind turbines, millions of solar panels and high voltage transmission lines criss-crossing our pastures and bush will turn potential visitors, farmers and lifestyle property seekers away to other places. Tourists seeking quiet, peaceful, rural and pastoral vistas and a dark night sky in the CWO REZ will become a thing of the past as visitors avoid REZs with fervor!

Tourist accommodation will be overtaken by REZ workers impacting tourism in the region. **This is already evidenced** by solar and wind farm workers looking for accommodation via multiple daily local community group Facebook posts. Many shops in town catering for tourism (such as in the town of Mudgee - that is the winner of multiple tourism awards) will be drastically impacted and likely forced to close given the major change in clientele to the town.

An influx of workers will limit housing availability and affordability for permanent residents.

The dramatic increase of cumulative traffic (estimate 5000 additional vehicle movements per day on affected road) during construction, for years, causing lengthy delays, driver frustration and increased danger on the roads, will also deter visitors from our district.

(h) suitable alternatives to traditional renewable energy sources such as large-scale wind and solar

Coal has provided our nation with reliable, cheap electricity for decades (and in some centre's over a century).

We urge the government to build new clean-coal electricity generators at the existing brownfield sites, and to start to build nuclear power stations so that they are operable before these newest coal fired stations retire. That is the only sensible and cost effective way forward.

We call for an immediate cessation of all large-scale wind, solar, hydro battery dam, Battery Energy Storage System (BESS) and transmission projects located far from end users. These projects present numerous challenges: wind and solar provide unreliable and intermittent power; the proposed Phoenix hydro battery dam is energy negative and proposed on drought-prone land and BESS systems, on average, can only provide 2–4 hours of backup power. Moreover, establishing these unreliable fire prone energy sources necessitates thousands of kilometres of new transmission infrastructure, requiring a costly and extensive reconfiguration of the whole electricity grid that at the end of the day will not work, backed up by taxpayer subsidies and a new gas plant planned for Dubbo. And, last but not least, this infrastructure has a devastating impact on ecosystems due to the vast land footprint covered by these developments.

(i) adequacy of community consultation and engagement in the development of Renewable Energy Zones, and associated projects

Using the Energy Co CWO REZ Transmission Project's EIS as an example:

Whilst the CWO REZ has a population of 152,418:

a) only 7 landowners were interviewed.

b) only 44 interviews were undertaken in the social impact study including councils, landowner "hosts", neighbours and community (only 0.03% of the population).

c) An online survey had 104 responses (0.06% of the population).

d) A community survey in early 2023 had 290 responses (0.19 % of the population)

Engagement, as we experience and were told by our members from across the CWO REZ, was purely Energy Co relating what will be happening, but did not show an honest attempt at understanding and addressing people's concerns in a real way and neither have they completed a comprehensive social impact study.

The limited surveys that were undertaken show no real support for the project. **Only one person said that they could see benefits**. Extrapolating that result, it is clear that Energy Co did NOT have social license to proceed, yet it was waved through and approved by the Minister.

Energy Co said they would "consider" feedback from the public but did not state they will act on that feedback. A number of concerns were raised in the limited interviews/surveys, but these were not adequately resolved.

The conclusions made in the social impact assessment were faulty and based on an inadequate and not fit for purpose social impact assessment. A comprehensive and targeted social impact study was apparently not required before the Department of Planning assessed the application.

Chapter 20 of Energy Co's CWO REZ Transmission EIS outlined a number of cumulative negative social impacts that were admitted as being fueled by Energy Co's transmission infrastructure, including:

a) detrimental effects to community cohesion,

b) impacts to sense of safety,

c) diminished sense of place,

d) road delays and sense of safety,

e) Aboriginal cultural values,

f) capacity of health, food, and social services,

g) the way people enjoy and connect with the environment,

h) people's ability to affect change in their local area,

i) stress from bushfire risk,

j) diminished sense of belonging,

k) loss of aesthetic values,

l) loss of biodiversity

m) impact to agricultural land and food production for future generations, and more.

Yet, all of these came to naught with the approval of the project "for the greater good" (i.e. for the good of the cities and coastal fringes). Bad luck to the residents and communities caught up in a REZ!

In Sept of 2023, our organization made a lengthy submission to DPE (see attachment 1) after a meeting with Matthew Riley about the draft wind guidelines that at that time were undergoing review.

Items mentioned in this submission are below including the results (in Italics) in the approved guidelines. Overall, the approved Guidelines read like a wish list from developers with the community and neighbours concerns, for the most part, ignored and in many cases a reduction to the protection of landowners:

a) **Request:** A minimum setback increased to 6km from residences to turbines (with justification based on extensive documented evidence)
Result in Approved Guidelines: *setbacks have been REDUCED to allow for higher turbines closer to residences. Their sliding scale now finds it acceptable for turbines of 315m high to be within 2km of residences. Even the draft 2023 guidelines had 250m turbines dominant at 2km. The previous guidelines (2016) stated a 250m turbine had to be carefully considered out to approx. 3.4km. The previous consensus based on the 2011 guidelines was a required minimum 2km setback for ANY height turbine (at this time turbines were around 100-140m high).*
This is a clear case of the Department not acting independently and acceding to the wishes of the developers and the political persuasions of the day - who find neighbours delaying projects because of negative effects to visual amenity.

b) **Request:** photomontages provided to all surrounding landowners out to 10km from proposed turbines and include all potential views, not just the worst-case location.
Result in Approved Guidelines: *a simple (desktop) assessment is all that is required unless a moderate or high impact is* ***determined by the proponent****. Detailed visual impact assessments including photomontages are only for landowners within the setback area (2km for a 315m high turbine) and assessed as moderate/high impact.*
A clear case of Department acceding to the developer who wants to save effort/expense and minimise community awareness of the impact of their project.

c) **Request:** assessment of cumulative visual impact be extended from the previous 8km to 20km in line with the increased size of the turbines and large project areas
Result in Approved Guidelines: *a sliding scale has been introduced, reducing the distance to be assessed. The maximum height on the 2016 guidelines was 250m and so 8km. Now a 250m turbine only has to consider out to 7.2km – a turbine has to be 280m high to consider out to 8km and a 350m high turbine out to the maximum of 10km.*
Yet another clear example of the wishes of the developer met, to make it easier for them to get approved, ignoring the views of and adverse impacts on the local community and nearby landowners.

d) **Request:** landscape assessment values determined by impacted landowners and the local community.
Result in Approved Guidelines: *a frame of reference has been provided by DPE in guidelines which can be used by the developer with a suggestion that community values should be "considered".*
We have experienced what "considered" means, it means **IGNORED**.

e) **Request:** Vegetation screening as mitigation be reconsidered and single trees ignored as 'screening'
Result in Approved Guidelines: *vegetation screening is still acceptable as mitigation.*
Once again the easy way for developers, not taking into account that a single tree can be blown over in a storm and all "screening" effect gone and a replacement tree taking decades to grow.

f) **Request:** Minimum requirements for photomontages with penalties if not adhered to.
Result in Approved Guidelines: *ignored*

g) **Request:** Community engagement/consultation recommendations including notification to ALL surrounding landowners at the outset of a proposal, via letter to their primary addresses.
Result in Approved Guidelines: *ignored.*

h) **Request:** Independent consultant selection requirements for wind farm assessments.
Result in Approved Guidelines: *ignored*

i) **Request:** Decommissioning Requirements including financial security bonds
Result in Approved Guidelines: *ignored.*

j) **Request:** Standardised host agreements, neighbour agreements and information handouts provided by Department of Planning to all potential hosts and neighbours.
Result in Approved Guidelines: *A general agreement document was prepared by the Department with information and examples.* There are no standardized agreements for hosts or neighbours and no requirement for the developer to provide this Department document to all hosts and neighbours. Many may therefore sign, without adequate information being provided.

k) **Request:** Time limits on developers within the approval process, rather than the ability to control an undeveloped generation project site ad infinitum to the devastation of

surrounding neighbours.
Result in Approved Guidelines: *ignored*.

l) **Request:** Additions to the guidelines under biodiversity and hazards and risks
Result in Approved Guidelines: *biodiversity and uncertified airfields additions have been included. Aerial firefighting has been ignored citing a study not applicable to current turbine heights and terrain in the CWO REZ.*

We would also like to note that we requested to be able to view all the submissions made to the Draft Wind Guidelines on multiple occasions, so that we could have further input. The submissions have never been made available to us.

(j) how decommissioning bonds are currently managed and should be managed as part of large scale renewable projects.

There are currently no decommissioning bonds in place for wind or solar projects and it appears proponents of pumped hydro and BESS projects are also exempt from decommissioning bonds.

The current guidelines leave the fate of decommissioning in the hands of turbine hosts (rural landowners) and their ability to understand and negotiate their future decommissioning via private contracts with wind farm proponents. This is grossly inadequate and has resulted in instances where wind developers change hands multiple times and go bankrupt, leaving hosting landowners to foot the bill for decommissioning - which ultimately means turbines are left to rust on-site with associated safety, contamination and bushfire risks and ongoing impacts for surrounding landowners and communities.

According to the AEIC as extracted from the Commissioner's 2021 Annual Report, "To put these costs into perspective, the total fees earned for hosting a turbine for 25 years could be in the range of $250,000 - $750,000 [per turbine] (depending, typically, on the turbine capacity and when the wind farm commenced operations). It is therefore possible that the costs to decommission a turbine could be equal to or greater than the total income generated for the landholder over the 25-year lease period."

Accordingly, host landowners, surrounding landowners and communities require security, oversight and ongoing evidence that wind farm project owners are legally required to and have the capacity to fund the decommissioning of their wind projects, and that such funds are properly set aside securely upfront and ongoing for that purpose. Examples that should be considered include upfront bank guarantees, a sinking fund, a trust fund or a security bond deposit - held and managed securely by the NSW Government. We request that a legal framework be set up to ensure this occurs.

AEIC as extracted from the Commissioner's 2021 Annual Report notes that: "Some proponents are offering to deposit decommission funding into a trust fund, but typically not commencing until the later years of the project life, such as year 15 or even year 20. There are several risks with the timing of such an approach and would require the project owner to

source significant funding in the declining years of the asset to achieve the funding requirements. It would be much more acceptable, and at far less risk to the landholder [surrounding landowners and the community], for the developer to commence funding the decommissioning trust fund from commencement of the asset's operations."

To ensure the decommissioning of turbines and associated infrastructure and removal of all contaminants at end of life of a wind project, we assert that there should be at least 1 million dollars per turbine securely set aside upfront based on today's costings, before a wind project commences construction. And regular ongoing payments should be made into a secure account to account for inflation and cover all identified decommissioning and recycling costs.

AEIC as extracted from the Commissioner's 2021 Annual Report notes that: "The Offshore Electricity Infrastructure framework requires license holders to decommission all infrastructure and address environmental remediation at the end of a project's life. Developers are also required to provide financial security that covers the cost of decommissioning infrastructure to ensure these costs are not borne by the Australian Government." This same level of decommissioning security must be extended to onshore wind farms to protect host landowners, surrounding landowners and rural communities.

Thank you for the opportunity of participating in the Inquiry

Annette Piper
Co-Secretary
CWO REZist Inc.

Amber Pedersen
Co-Secretary
CWO REZist Inc.