

Submission  
No 49

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

**Organisation:** Burrendong SOS - Community Group

**Date Received:** 31 January 2025

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31 January 2025

**Burrendong SOS's submission to NSW Parliament Legislative Council - Portfolio Committee No.4 – Regional NSW Inquiry into and report on the impacts of Renewable Energy Zones (REZ's) on Rural and Regional Communities and Industries in New South Wales**

Dear Committee Members,

Please accept Burrendong SOS's submission to your enquiry (in consultation with CWO REZist Inc). Burrendong SOS is located within the Central West Orana Renewable Energy Zone (CWO REZ). Burrendong SOS is a grass-roots community group that currently comprises of 70 non-associated landowners and residents surrounding the Burrendong Wind Farm/Factory project site and also impacted by the proposed Piambong Wind Farm/Factory; Phoenix Hydro Battery Dam proposal; and various wind factory prospectors to the south.

We believe that residents of Renewable Energy Zones (REZ) need to be specifically considered.

NSW has not been faced with a REZ situation before – the high volume of energy related development proposals and its cumulative impact on REZ residents, as well as the impacts on the environment and agriculture have not been adequately addressed by the government to date. Residents need protection from these multiple developments.

REZ communities and landowners are effectively being forced to live within 'power stations' (as explicitly described in the NSW solar guidelines). As such, we must be afforded greater protections and certainty for our futures.

The current fast paced push to transition to renewables has not considered the interests of local communities, landowners and protection of the environment. It is, in fact, causing years of significant distress and entrenched mistrust and opposition to wind, solar, batteries, pumped hydro dams and transmission line infrastructure, and mistrust of all levels of Government.

Significant injustices have been and continue to be perpetrated against regional communities and landowners located within REZ's, that is driven by political ideology and greed.

The severe lack of social licence has resulted in a significant roadblock for the Australian Government to increase the amount of energy produced from renewable sources to 82% across the National Electricity Market by 2030.

Proponents mistakenly believe that "effective community engagement" is a meeting in which they TELL landowners what is going to happen – it is not asking, listening, discussing and working together on the best way to achieve shared objectives.

Proceeding with the current state of play will lead to civil unrest and anarchy.

There are many more issues than the ones outlined in this unpaid-for submission. There have been so many instances over the past four years where detailed submissions prepared by Burrendong SOS have been ignored., I hope this is not another one.

**Summary of issues covered by this submission:**

1. A call to withdraw the adoption and re-exhibit the CWO REZ due to negligible community notification and engagement that occurred during Covid 2020 lockdowns.
2. Extreme adverse cumulative social impacts on communities and landowners located within a REZ.
3. Need for a mandatory requirement to notify surrounding landowners (via a letter to their primary postal address) at the outset of project proposals and at other key stages of a project.
4. Psychopathic tendencies of profit-driven multinational corporations.
5. Rural landowners are being used by proponents as their “free” report editing service.
6. Absence of Government-funded advocacy and support for adversely impacted rural communities and landowners.
7. Examples of unsatisfactory engagement in the CWO REZ.
8. Community benefits – inequality of a transition to renewables.
9. Loss of trust in alleged “independent” consultant reports supporting project proposals.
10. Wind turbines - a mandatory 6km (ideally 10km) upfront minimum setback of residences to turbines is required to reduce cumulative social impacts, improve community engagement and reduce opposition.
11. Mandatory provision of photomontages to landowners surrounding wind turbine proposals – to improve community engagement.
12. Community surveys and focus groups.
13. Wind development decommissioning requirements.
14. Standardised host agreements, neighbour agreements and information handouts prepared by Government, with mandatory distribution by proponents.
15. Removing the ban on Nuclear.
16. Biodiversity
17. Bisphenol A (BPA)

## 18. Unfair charges for Freedom of Information Requests within REZ's

### 1. **A call to withdraw the adoption and re-exhibit the CWO REZ due to negligible community notification and engagement that occurred during Covid 2020 lockdowns**

Most residents currently forced to live within the CWO REZ “power station” were completely unaware of the public exhibition for the CWO REZ proposal, which was pushed through to adoption during the COVID 2020 lockdowns.

Given the proposal's significant impact on multiple factors e.g. property, lifestyles, livelihoods, agriculture, tourism, landscape, water supply and the irreversible impact on the environment, it should have, at the very least, involved a letter notification to the primary residential addresses of **all** landowners within the REZ. This crucial step was not taken, and the majority of residents were neither informed nor adequately engaged nor consulted regarding the exhibition or approval of the CWO REZ.

The majority of landowners do not receive newspaper deliveries to their relatively isolated rural properties, internet access is also limited and due to Covid lockdowns, aside from letter notification to landowners primary residential addresses, there was no other way to satisfactorily notify impacted landowners of the public exhibition and provide them with adequate opportunity to review and make submissions on the proposal.

In this regard, Burrendong SOS and CWO REZist Inc. requests that the NSW Government withdraws the adoption / declaration of the CWO REZ and that it is re-notified and re-exhibited, in order to engender a social licence and meet notification requirements of the EP&A Act 1979.

A precedent has been set for this to occur by the former NSW Minister for Planning Brad Hazzard, who deferred an area of land in Oxford Falls Valley and Belrose North, NSW, from the Warringah Local Environmental Plan 2011 on the grounds that those landowners did not receive a letter notification of the planning proposal. The same level of consideration should be extended to rural landowners within the CWO REZ that have even greater reasons to support deferral and re-exhibition, as outlined above.

### 2. **Significantly adverse cumulative social impacts on communities and landowners within REZ's**

Landowners compelled to reside within REZ “power stations” experience profoundly adverse cumulative social impacts.

A prime illustration of this is evident among residents near Burrendong Dam, NSW, in the CWO REZ. They are currently confronted with an overwhelming degree of projects surrounding them. They are contending with mounting engagement demands imposed by 100% profit driven multinational and foreign-owned corporations, in addition to those proposed by various levels of government, including but not limited to:

- Ark Energy's Burrendong Wind Farm proposal – 250m high turbines proposed to be setback only 1km – 2km from some dwellings, located on the top of ridgelines turbines would tower (to the tip) up to ¾ km into the air above dwellings located in valleys below.
- Vesta's Piambong Wind Farm proposal - Vesta has so far ignored submissions from surrounding landowners regarding significant visual landscape features when determining their initial turbine layout, such as Cooeee Mountain (turbines are proposed to tower approximately 200m above it) with noise set to echo down the rocky valley.
- Ungula Wind project – currently under construction.
- Tilt Renewable Wind prospecting – targeting potential host landowners to the south.
- Pheonix Pumped Hydro Dam proposal – plans to utilise water from Burrendong Dam, a reservoir where water levels dropped significantly (down to a stream in parts) during the last drought.
- Landowners approached by multinational corporations for road widening and threatened with compulsory acquisition - adding to pressures on landowners.
- EnergyCo's:
  - Push for the rollout of transmission infrastructure (detailed further below).
  - Public exhibition of EIS for 3GW power CWO REZ (7910 pages of documentation) to respond to within 28 days. This exhibition period include a public holiday long weekend and part of the NSW school holiday period.
  - A request for submissions on a proposal to double the Gigawatt power in the CWO REZ to 6 GW power with extremely limited information to comment on.
  - Many more notifications requesting community submission input that is historically totally ignored.
- NSW Energy Guidelines – ongoing updates including the review of the NSW Wind Energy Guidelines in which Burrendong SOS and CWO REZist Inc's submitted well research submissions that took a considerable amount of time and effort and were totally ignored by the NSW DPIE in favour of Wind Energy Corporations.
- Australian Energy Infrastructure Commissioners Office
  - Multiple reviews/enquiries requesting input such as the Community Engagement Review 2023. Our children are missing out on quality time with their parents as they are forced to prepare submissions during the NSW school holidays.
  - Following up on complaints lodged with the Australian Energy Infrastructure Commissioners (AEIC) Office. In our experience AEIC is a total waste of our time and energy - AEIC acts lie a glorified email forwarding service between Wind Energy Corporations and rural landowners and hasn't resolved/rectified or provided justice on any issues brought to them.
- Mid-Western Regional Council. policies exhibited for community benefit funding from renewables etc.

**The overwhelming number of projects affecting communities and landowners within the CWO REZ (that can often occurring simultaneously), leads to prolonged periods**

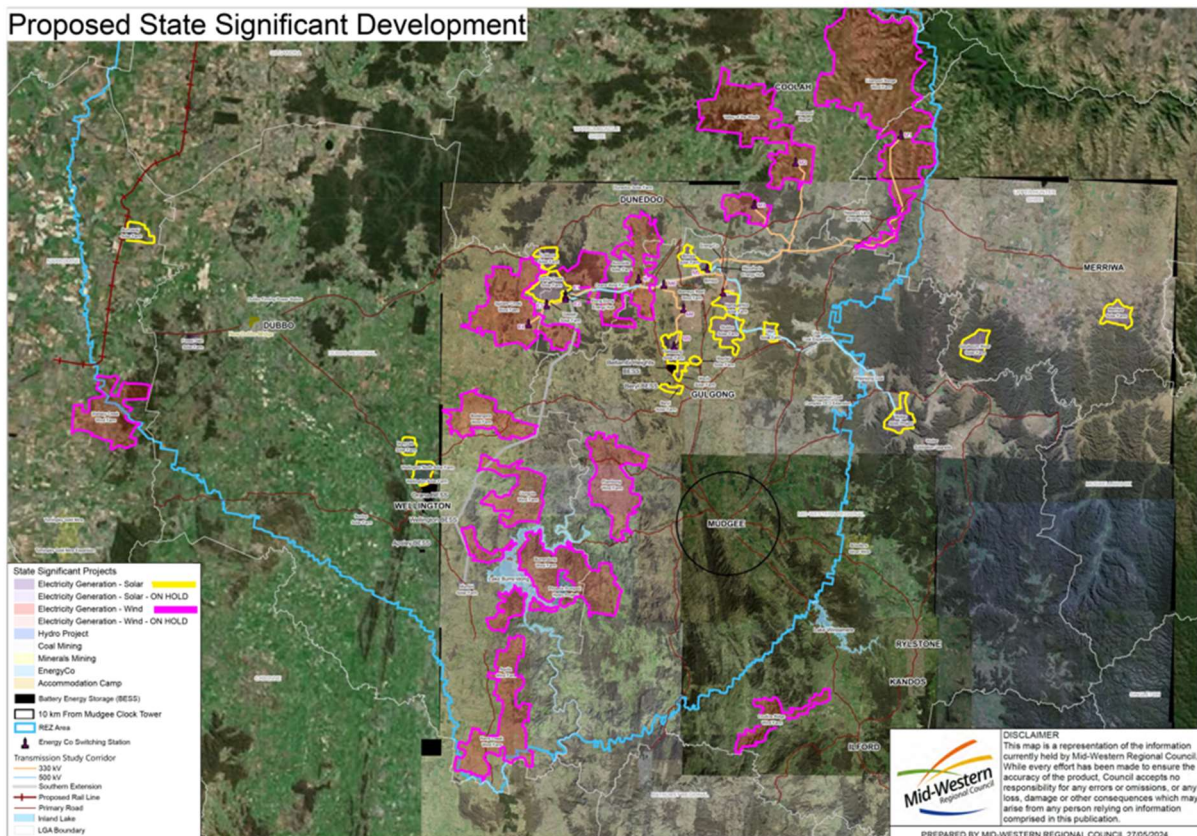
**of severe stress, anxiety, and financial hardship.** People in this region, who find themselves in this situation against their will, are burdened with extensive paperwork, engagement efforts, document reviews, submissions, and countless meetings. They are forced to fight at their own expense for several years in detail, attempting to secure fundamental protections for their multi-generational properties, families and the local environment against both potential and confirmed adverse impacts.

Proponents benefit from this “engagement” overkill by suggesting that there has been minimal objection to their projects, which is far from the truth of the situation. Communities and landowners are being buried in paperwork and meetings.

Communities and landowners in the CWO REZ want their lives back, to make a living, raise their children or retire peacefully and contribute positively to their communities, instead of being devastated by the entrenched inequity of this energy transition.

***Indicative project currently under assessment or construction in the CWO REZ***

The following map has been paid for and prepared Mid-Western Regional Council and CWO REZist Inc. a local not-for-profit organisation, because NSW Government refuses to provide a land use map outlining the footprint of all energy developments/proposals within the 20,000 sq km CWO REZ – perhaps as an attempt to avoid consideration of cumulative impacts? There are several proposals missing from the below map, with over 56 projects currently in the pipeline for the CWO REZ.



**3. Need for a mandatory requirement to notify surrounding landowners (via a letter to their primary postal address) at the outset of project proposals**

Efforts to notify non-associated landowners about renewable energy projects must match the level of diligence demonstrated by proponents contacting potential host landowners. Many developers currently engage in minimal notification and engagement with surrounding landowners, and if it occurs it often occurs years after securing hosting agreements.

Using pamphlet letter box drops and sporadic local newspaper advertisements is insufficient for effective notification. Many landowners do not have letterboxes at their properties and some do not currently live on their rural properties full time, so pamphlet drops do not reach them. Newspapers are also predominantly not delivered to rural areas and regional homes have poor and often non-existent internet access. People frequently remain unaware of projects until construction begins. This is unacceptable.

Government should mandate that energy proponents notify surrounding landowners (out to 20km for wind and transmission projects) at a proposal's outset via letters sent to surrounding landowners primary postal addresses (the same address where rate notices are sent), with the assistance of local Councils and postage costs borne by the proponents. Local Councils, with access to confidential primary postal addresses for rate notices, can assist in this process. Proponents such as Ark Energy already do this to contact potential host landowners and should do the same for surrounding landowners (e.g. in the CWO REZ, Ark Energy had Mid-Western Regional Council send letters to connect with potential host landowners, with Ark Energy covering postage costs).

Many problems and concerns have been generated from inadequate notification and engagement with surrounding landowners, both upfront and ongoing. Surrounding landowners are kept in the dark and do not get an opportunity to provide feedback into the preliminary siting and design of proposals, to reduce impacts and stress on them (even if this is a guideline requirement). For example:

- Lack of upfront project notification via mail-out to primary residential addresses meant that wind proponent ACEN (Valley of the Winds project) listed a neighbour as “associated” in their EIS when they were not. This neighbour was not only not notified of the proposal upfront, but were not assessed for amenity impacts (also skewing the data in the EIS). The neighbour only found out about the project through a letter from NSW DPIE and an accidental phone call from the proponent during the exhibition period who thought they were contacting a host (a cousin with the same initial and surname). The nearest turbine is planned 3.4km from the residence and the neighbour will see in excess of 100 turbines. No direct contact/engagement has been made by the proponent with this neighbour, apart from following up a specific request by DPIE.
- Vestas’ Piambong wind project clearly states on their project timeline that early project development began in 2020, yet they did not start community notification/engagement until 2022 via a pamphlet letter box drop and potentially an advertisement in a newspaper. A poor-quality sitemap of the proposed turbine layout was also only emailed to some surrounding landowners in mid-2023 after years of hassling Vesta to provide one. Whereas, host landowners were provided with a map at least a year prior to this. Provision of photomontages by Vestas to surrounding landowners to enable them to visualise and provide considered feedback on proposed visual impacts have also been refused to date.

- Residents at Reflections Holiday Caravan Park, Yarrabin NSW have still not been notified of Ark Energy's Burrendong Wind Farm proposal, with 250m high turbines proposed to be located approximately 2km from some dwellings, and on ridgelines elevated nearly ½km into the air above them. Ark Energy lodged and exhibited an EIS for their proposal with NSW DPE, yet no direct notification or engagement occurred with these site holders.
- Ark Energy added 10 x 250m high wind turbines to their Burrendong Wind Farm Proposal, closer to the highest density of homes, without notifying the majority of immediately impacted surrounding landowners.
- Initially, there might have been a notice in the local newspaper and a pamphlet letter box drop to notify some landowners about Ark Energy's Burrendong Wind Farm proposal. However, this notification was notably inadequate, as many landowners don't receive the local newspaper, lack letterboxes at their property gates, or don't live on their properties full time.

The majority of surrounding landowners remained unaware of Ark Energy's proposal due to this lacklustre notification effort. Also after examining the original turbine layout map, many landowners initially notified about the project decided not to sign up for email updates, believing the turbines were sufficiently distant from their dwellings. Consequently, these landowners, along with others not initially notified, were oblivious when an extra row of 10 turbines, towering 250m in height, were added to the far north-eastern extent of the wind farm proposal. These turbines are proposed to be only set back 1km to 2km from some dwellings and situated on top of the Worlds End Ridgeline, with turbine tips reaching up to ¾km into the air above the relative level of houses in the valley below. This is extreme impact and no notification! Disturbingly, there was no newspaper notice or additional direct letter mail-out to inform surrounding landowners about the addition of these 10 turbines closer to their homes and properties. Only those who signed up for email updates received a misleading project update that snuck this north-eastern row of 10 turbines onto the project map with deceptive text (only acknowledging the addition of turbines to the opposite western side of the project site on NSW Water land).

Furthermore, none of the landowners situated to the north-east of these late addition of 10 turbines were proactively engaged by the proponent for input into the preliminary scoping, siting and design phase of the project's 'Social Impact Assessment' (SIA) nor 'Visual Impact Assessment' (VIA). Notably, surrounding neighbours located in the north-eastern vicinity explicitly sought participation in the 'Social Impact Assessment', only to be refused by Ark Energy (Ark Energy refused landowner contact with their allegedly independent SIA consultant – Ethos Urban). Participation was reluctantly granted to limited neighbours one year later, just before Ark Energy planned to submit the Environmental Impact Statement (EIS) to NSW DPIE, seemingly as a perfunctory exercise. (Email evidence is available to substantiate this claim.)

Burrendong SOS as the key community group for the area was never been consulted on the SIA for the EIS.

Government allows proponents to perpetrate such behaviour on rural communities and landowners repeatedly. To deter companies, such as Ark Energy from such conduct, financial penalties must be imposed. These are not merely "errors" on Ark Energy's part;



they are deliberate and deceptive acts. Such actions (and inaction of behalf of the Government) not only erodes trust but also intensifies community resistance to all renewable energy projects.

Standards need to be introduced to protect communities and/or penalties and application rejections need to be imposed on proponents who do not effectively notify and make meaningful, respectful and effective community and stakeholder engagement across the whole process from initial development through to post approval.

#### **4. Psychopathic tendencies of 100% profit driven multinational corporations**

The 2003 documentary "The Corporation," co-authored by University of British Columbia law professor Joel Bakan and filmmaker Harold Crooks, identifies that multinational corporations, driven by a relentless pursuit of maximum profits and Government subsidies, exhibit psychopathic tendencies. The film parallels corporate behaviour with traits associated with a psychopath, examining this alignment through the World Health Organization's Personality Diagnosis Checklist from the "Manual of Mental Disorders." That is:

- Callous unconcern for the feelings of others
- Incapacity to maintain enduring relationships
- Reckless disregard for the safety of others
- Deceitfulness: repeated lying and conning others for profit
- Incapacity to experience guilt
- Failure to conform to social norms with respect to lawful behaviours

Here is a link to view this documentary:

[https://www.bing.com/ck/a?!&&p=ee403b7b15fcb9aeJmItdHM9MTY4NzgyNDAwMCZpZ3VpZD0yZjUwYjk4Ny1hZWY4LTYzZDYtMTg5MS1hOWJjYWY2ODYyYTUmaW5zaWQ9NTE0NQ&pqn=3&hsh=3&fclid=2f50b987-aef8-63d6-1891-a9bc6af6862a5&u=a1L3ZpZGVvcy9zZWZyY2g\\_cT10aGUrY29ycG9yYXRpb24reW91dHVlZSZxcHZ0PXRozStjb3Jwb3JhdGlvbit5b3V0dWJlJkZPUk09VkRSRQ&ntb=1](https://www.bing.com/ck/a?!&&p=ee403b7b15fcb9aeJmItdHM9MTY4NzgyNDAwMCZpZ3VpZD0yZjUwYjk4Ny1hZWY4LTYzZDYtMTg5MS1hOWJjYWY2ODYyYTUmaW5zaWQ9NTE0NQ&pqn=3&hsh=3&fclid=2f50b987-aef8-63d6-1891-a9bc6af6862a5&u=a1L3ZpZGVvcy9zZWZyY2g_cT10aGUrY29ycG9yYXRpb24reW91dHVlZSZxcHZ0PXRozStjb3Jwb3JhdGlvbit5b3V0dWJlJkZPUk09VkRSRQ&ntb=1)

This documentary provides clarity regarding the psychopathic traits that have been repeatedly experienced by rural communities and landowners including Burrendong SOS during their forced interactions with 'renewable' energy corporations and EnergyCo operating within the CWO REZ. Examples of these experiences are detailed throughout this submission.

Currently, multinational corporations can say anything they like to communities and landowners, they can lie, be recorded with clear evidence of these lies and are still allowed to get away with it. There are no repercussions. **The Government at all levels are allowing multinational corporations to run rough shod over rural communities.**

With regard to REZ's, the Government is effectively subjecting our mental health and wellbeing to multiple psychopathic corporations simultaneously, with no restraint in sight. It is little wonder that landowners within REZ's are now being forced to "Shut the gate"!

In our experience, there are no real Government protections for rural communities subjected to, in some instances, criminal behaviour by multinational corporations when it comes to the ideological push for 'renewable' energy. This is placing communities and landowners under

unprecedented levels of stress and forcing them to have to resort to the court of law as their only option, at great personal expense.

The NSW DPIE has not only disregarded but also manipulated its own guidelines in favour of wind corporations, as evidenced by the approval of the Hills of Gold Wind Farm and its associated conditions of consent. Nowhere in the guidelines is economic feasibility mentioned as a consideration, yet adverse impacts from non-compliant wind turbines have been dismissed, prioritising the developer's economic interests over adherence to the guidelines and community/landowner/environmental well-being. What is the point of Guidelines if they are overlooked to suit the Governments agenda?

We have found that the majority of commercial proponents are solely motivated by profits and rather than following the spirit in which Government guidelines have been written, they actively seek profit enhancing loopholes to achieve their financial objectives, to the detriment of rural communities, landowners and local ecosystems.

Proponents need to be factual and truthful about their projects. Communities and landowners are sick and tired of the "spin" presented by proponents. Multiple developers have been caught in the act of obfuscation, misrepresentation, misleading statements, imparting the bare minimum of information and unable to answer landowner/resident questions. E.g:

- Ark Energy (Burrendong Wind Farm/Factory) has attempted to state broadly that turbines had been deleted from their proposal due to studies and reports undertaken, however we have found the large majority of the turbines deleted were because a potential host refused to host turbines or allow an access corridor through their land, resulting in the deletion of approximately 30 turbines from the site plan.
- Ark Energy claims neighbouring property values will not be impacted, yet a neighbouring landowner had a contract of sale cancelled during the settlement period as a direct result of Ark Energy's proposal and location in the REZ, with zero compensation on offer (evidence available on request).
- CCC meeting minutes for the Burrendong Wind Farm/Factory proposal have been edited to remove details and questions raised in the meeting that do not support the proponents proposed project.
- On 8 November 2022, Ark Energy provided Burrendong SOS with a clear recorded contractual agreement and commitment THAT: when Moir Landscape Architects (Moir) are out in the field, Ark Energy will instruct Moir to undertake photomontages from all dwellings within 3.35km of proposed turbines, based on landowner requests (Meeting recording times: 0:55:26 – 0:56:43 & 0:58:20- 0:58:30) and photomontages from dwellings outside of 3.35km will be provided on a case by-case basis (Meeting recording time: 0:58:33) and that a copy of these photomontages will be provided to surrounding landowners prior to Ark Energy's lodgement of their EIS to NSW DPE for public exhibition, so that our community members can understand and provide feedback on the visual impacts from their dwellings.

Skip to today's date and several landowners who provided Moir (on behalf of Ark Energy) access to their land on Monday 27 March 2023 in exchange for the agreed provision of photomontages, STILL have not received photomontages. And Ark Energy

has reverted to disputing the statutory definition of a dwelling, even though that matter was resolved on Friday 24 March 2023 prior to agreed site visits.

It is grossly apparent that Ark Energy is still disputing this because Ark Energy does not want to provide photomontages from all dwellings, especially from those in Worlds End, as some dwellings are located within 1.2km to 2.5km of Ark Energy's 250m high turbines that are proposed along the top of the Worlds End Ridgeline, towering over 1/2km up to 3/4km into the air above the relative level (RL) of some dwellings located in the eastern Worlds End valley below. Obviously visual impact will be horrific!

As photomontages from landowners' residences have not been provided to landowners PRIOR to Ark Energy's submission of the EIS to NSW DPE for public exhibition, evidence indicates that Ark Energy (via Moir Landscape Architects) has gained access onto landowners' properties by deception, and in doing so have acted fraudulently, which is a criminal offence under Sec on 192E of the Crimes Act 1900 (NSW).

Ark Energy was the subject of an open complaint with the Australian Energy Infrastructure Commissioner (AEIC) regarding this indicative Criminal Offence. Evidence of this is clearly outlined and provided in Burrendong SOS's 'photomontage' complaint lodged with the AEIC on 27 June 2023. Burrendong SOS's experience in dealing with the AEIC is that it was an absolute waste of our time and the AEIC is nothing more than a glorified emailing service between the proponent, NSW DPIE and Burrendong SOS Representatives. AEIC has not enough staff or funding to deal with issues put to them.

- Ark Energy's veiled threats present as an assault to our democracy. Ark Energy is attempting to threaten landowners, almost like blackmail - that if landowners (with dwellings in close proximity to turbines), don't hand over their historic or other dwelling entitlement / development approval information to prove themselves, then Ark Energy won't provide them with e.g. noise and visual impact assessments and associated photomontages, and even worse taking it one step further, landowners have been made fearful that if they voice their opposition to the wind farm, Ark Energy (a South Korean owned multinational mining corporation) will take steps to try and have them evicted from their multi-generational homes and properties, causing them immense fear and distress. Noting some landowners dwellings are over 100yrs old!

This situation flagrantly violates our communities freedom of speech and democratic rights, contradicting EP&A Act, EP&A Regulation, SSD Guidelines, and NSW Wind Energy Framework consultation and assessment requirements.

- TILT (Liverpool Range Wind) has stated in their Response to Submissions (Sept. 2023) there is no evidence of koalas in the Coolah Tops National Park, adjacent to their turbines, yet NPWS found a thriving community of over 40 koalas there, earlier this year.

To counter the psychopathic tendencies of renewable energy corporations and to install some protections for residents within REZ's, the following are recommended:

- Establishment of an independent, government funded advocacy and support entity that solely represents the interest of communities and landowners within REZ's (Detailed in point 6 below).

- All interactions (including meetings) between renewable energy corporations and rural communities / landowners should be required to be recorded and stored (unedited) on public record at the request of communities / landowners.
- All contracts relating to a project and host landowners etc should be made publicly available.
- There should be an investigation and significant financial repercussions / penalties for renewable energy proponents and quasi statutory bodies such as EnergyCo for poor behaviour, lies and gaslighting perpetrated during community engagement.
- Where clear evidence of lies and gaslighting has been perpetrated on communities and landowners by 'renewable' proponents, this should be immediately corrected and publicised by Government. A record of these incidences should be made publicly available, filed against the name of the offending corporation on the Government's website.
- In the pursuit of genuine community engagement, renewable energy corporations must adhere to strict ethical standards. Those with a track record of poor engagement, where they are unable to develop positive relationships with impacted communities causing entrenched community opposition (such as Ark Energy), should be barred from the development of renewable energy projects in Australia. Such a process would send a clear message to ensure that only corporations committed to positive relationships and responsible development can participate in Australia's renewable energy landscape.
- Proponents like Ark Energy, who submit grossly inadequate EIS reports—as highlighted in Mid-Western Regional Council's submission—and refuse to provide additional information requested by NSW DPIE, should have their proposals rejected outright, not negotiated towards approval. For instance, the Burrendong Wind Farm/Factory proposal lacks two years of essential environmental studies across all seasons as requested by NSW DPIE (Evidence of this request can be provided). Notably, "Burrendong" is an Aboriginal word for "Koala," yet the project threatens critical koala habitat, along with key pollinators such as microbats, red-tail black cockatoos and the habitat of wedge-tailed eagles. This project has already inflicted four years of distress on the community, disrupted neighbouring property sales, and remains entirely unacceptable, it must be rejected.

**5. Rural landowners are being used by proponent as their “free” report editing service**

The Government requires that rural communities and landowners engage directly with profit-driven multinational corporations regarding their renewable energy projects. This involvement includes a requirement for communities and adversely impacted landowners to provide 'free' detailed input into for example: projects preliminary siting and design; visual, social, agricultural, tourism and environmental impact assessments; and participation in community “meetings” controlled by project proponents, in an attempt to reduce adverse impacts on them.

Proponents regularly utilise the *Delphi Technique* in community meetings, giving the appearance of gaining public consensus on their predetermined outcome. These interactions

have very rarely led to any tangible reductions in adverse impacts on rural communities and surrounding landowners.

Using Ark Energy as an example illustrates how consultation with corporations can be turned against communities. Ark Energy, in the case of their Burrendong Wind Farm/Factory proposal removed a 'Table of Visual Magnitude' from its scoping report after Burrendong SOS effectively utilised the table to present an excellent supporting analysis for the removal of several turbines based on adverse cumulative visual impacts. We have documented evidence and a meeting recording where Ark Energy staff refused to acknowledge this analysis, attempted gaslighting and deception by verbally claiming misinterpretation, and then deceptively deleted the table from their updated scoping report. This deliberate action appears to be an attempt to conceal evidence that contradicts support for their proposal and aligns with a statement at the same meeting by an Ark Energy manager that: "we are in the business of building turbines, not deleting turbines."

This is only one such example. Considering such incidents, it is neither fair nor just that communities are compelled to expend their unpaid time engaging with profit-driven multinational corporations, to their own detriment. It also highlights the fact that the requirement for rural communities and impacted landowners to engage with profit driven multinational corporations is an unequivocal farce.

## **6. Absence of Government-funded advocacy and support**

Currently, there is a notable absence of government-funded advocacy and support entities dedicated to safeguarding the specific interests and rights of communities and landowners affected by renewable energy proposals within the CWO REZ and other REZ's.

Government guidelines and policies are proving inadequate, riddled with numerous loopholes. Government at all levels are effectively allowing 100% profit-driven and often foreign-owned multinational renewable energy corporations to lie, gaslight and run roughshod over rural communities and landowners with ZERO repercussions. This is a disgrace.

The sole recourse currently available for landowners is legal action, often at considerable personal expense.

We require significant government funding to establish an independent advocacy and support entity dedicated to safeguarding and representing the specific interest and rights of communities and landowners affected by multiple renewable energy proposals for each REZ. This should include funding for independent reviews of project proposals and submissions, legal protections and independent testing, assessments and audits etc.

## **7. A few examples of unsatisfactory engagement in the CWO REZ:**

### **a) *EnergyCo – interactions with landowners:***

- One landholder with a 330KV transmission line supposedly running along their boundary (not that they know because they can't get a map!) was told by an EnergyCo employee that if they're too hard to deal with the transmission lines would be placed over the fence, off their property, so they would still look at them but not get any money.

- A single landholder is being told they will have 300-400 trees removed from their property to make way for transmission lines. Some of these trees survived the Sir Ivan Bushfire in 2017 and the rest have been planted since. With the line proposed 100m from one of their houses and impeding their farming activities as their farming equipment will not be permitted to travel under the lines.
- A farmer has two 500KV and one 300KV transmission lines proposed to run directly through the middle of his approx. 600 acre property. The lines are drawn to go over all his infrastructure (cattle yards, shed etc) and take out numerous trees and a regeneration area. He has proposed two different routes, the first was flatly denied and the second is awaiting a response. The first EnergyCo contractor that set foot on the property said it was to mark out boundaries, when they left, there were pegs marking the easement line; they did not have permission for that.
- A small landholding is set to lose nearly 20% of their land to transmission lines. The proposed route takes out a dam, the only water source for one 90 acre paddock, and 60 shade trees rendering that paddock useless for stock.
- One farmer has a pacemaker and the doctor told him not to go within 600m of HV powerlines. Dual 330kv lines are proposed to dissect their farming property and skirt around the house and domestic area. They have engaged with EnergyCo but have got confusing signals and maps that change in minor detail. Despite 'negotiation' no substantive changes have been made to plans and the ability of the farmer to continue living on his property is unclear.
- There are many cases of landowners surrounding proposed transmission lines on neighbouring properties are not being consulted or engaged by EnergyCo, even though they will be adversely impacted.
- A farmer has dual 330kv lines proposed through domestic area, ~80m and ~300m from homes. EnergyCo has/will take over TILT easement but communication between these two entities is poor, and the landowner is in the middle. Alternate routes using crown land were dismissed.
- A farmer has dual 500kv lines proposed over the centre of his 700 acre property which will make it unsellable and unworkable as an agricultural property. The property also has wind and solar projects next door but powerlines are proposed to cross his adjoining non-host land. The landowner has made representation to any and all relevant parties without success. He is devastated and envisages he will be forced to sell and move if he can.
- Transgrid (prior to Energy Co) planned a corridor for HV Transmission across a farmer's property that went straight over their house. Transgrid made no attempt to contact the owners of the property, they only found out about it from an acquaintance who had seen the maps and brought it to their attention. Upon calling Transgrid they said they could put it anywhere as they had the backing of the State Government and didn't need "permission".

The same farmer is now subject to transmission towers and lines via EnergyCo who appear to be copying part of the earlier Transgrid corridor. Once again they were not contacted by EnergyCo, only finding out about it through a community group opposed to the project. The farmer attended an information session and the maps shown were out of date. They received an acquisition letter in May 2023. No offer of negotiation on placement of the lines/towers has occurred.

- All of the landowners and farmers outlined above have tried to work with EnergyCo but to no avail. Their suggestions are apparently taken back to the planners but nothing seems to happen after that. Communication/consultation is seriously lacking!
- Information sessions by EnergyCo are attended by poorly prepared junior staff. Senior staff at meetings still do not know what is going on and cannot answer landowner questions.
- Staff dealing with landowners lie about neighbours having signed agreements with EnergyCo.
- Staff dealing with landowners are casual in their contact with landowners, attempting to get things done via a random phone call, often out of hours, for urgent work the next day, rather than written correspondence with appropriate lead times.
- EnergyCo sent out an email update on Monday 25/9/2023 (for those who have registered for email updates) advising that an EIS to “unlock” at least 3 gigawatts of new network capacity in the REZ will be placed on public exhibition shortly. EnergyCo also advises that outdoor “pop-up stalls” will occur across the region “this week” (with only 3 and 4 days’ notice) on Thursday 28 and Friday 29 September 2023, to be held during work hours AND also during school holidays. Surely, this cannot be considered effective community engagement.

#### ***b) Ark Energy – Burrendong Wind Farm Proposal***

- ***Rural communities have been lied to and gaslit on multiple occasions.***

Ark Energy has repeatedly demonstrated ZERO social licence. They have threatened and attempted to silence community members and have continually worded correspondence in a gaslighting, deflective and deceitful way to avoid clarity and responsibility. Evidence of this is clearly outlined in Burrendong SOS’s ‘photomontage’ complaint lodged with the Australian Energy Infrastructure Commissioner on 27 June 2023.

- ***Refusal to acknowledge community feedback that does not support the progress of their project to approval***

Ark Energy have continued to ignore community input. Meetings with community members are merely a tick-box exercise for Ark Energy to meet guideline requirements and a total waste of time for impacted communities and landowners. For example:

- Despite being repeatedly informed, Ark Energy refuses to recognise the local Wiradjuri Peoples’ Totem animals are the Wedged-Tail Eagle, and the Crow in their documents. This is critical, considering the proposal’s potentially catastrophic impact on the local Wedge Tail Eagle population.
  - Ark Energy has also been repeatedly informed and refuse to acknowledge the fact that “Burrendong” is an Aboriginal word for “Koala” (as outlined in a NSW Water brochure for Burrendong Dam). Turbines continue to be proposed on environmental conservation zoned land which provides essential koala habitat.
- **Ark Energy – veiled threats and assault on our democracy**

Ark Energy (Korea Zinc) is attempting to threaten landowners, almost like blackmail - that if landowners (with dwellings in close proximity to turbines) don't hand over their historic dwelling entitlement / development approval information to prove themselves, then Ark Energy won't provide them with impact assessments such as visual impact assessments and associated photomontages, and even worse taking it one step further, landowners have been made fearful that if they voice their opposition to the wind farm, Ark Energy (a South Korean owned multinational corporation) will take steps to try and have them evicted from their homes, causing them immense fear and distress. Many of these landowners dwellings are over 100 years old and clearly have existing use rights!!!

Ark Energy has subsequently removed a number of dwellings from their project assessment maps (notably, dwellings within 1 to 3kms of their 250m high proposed turbines), refusing to acknowledge or assess them for adverse impacts! This is an absolute disgrace, and is not reflective of how NSW DPE has assessed *all residences* surrounding wind farm proposals for other wind farm development proposals. Ark Energy is attempting to find a loophole in the guidelines for their own financial gain, going against the spirit of the guidelines, to the detriment of the community and surrounding landowners.

This situation flagrantly violates community freedom of speech and democratic rights, contradicting EP&A Act, EP&A Regulation, SSD Guidelines, and NSW Wind Energy Framework consultation and assessment requirements. It is crucial for the government to promptly hold Ark Energy accountable for their actions and assert that all landowners around the proposed Burrendong Wind Farm have an unconditional right to receive detailed visual impact assessments including photomontages. Despite being aware of this issue since March 2023, the NSW DPE has yet to strongly challenge Ark Energy's unacceptable behaviour, leaving landowners stressed and in limbo on their rights. Immediate intervention is necessary to uphold community rights and democratic processes.

### **c) ACEN - Valley of the Winds proposal, Coolah**

- **Community meetings**

- Little effort was taken with contacting villagers from Uarbry, the site of a planned access road. The proponent contacted one local by phone and left it up to that person (at their own personal time and expense) to make personal contact with other residents and advise of the meeting. This happened on two occasions over a year apart.
- During the first community meeting the proponent said residents of the village would not see any turbines, yet the EIS photomontage proved they would see multiple turbines. They also stated disruption and inconvenience from the road access would be of short duration and limited traffic which was later disproved by their EIS.
- Follow up contact with residents addressing their concerns was never followed through.

- **Neighbours and near neighbours within 5km of the project**

- Few if any landowners within 5km of the project were notified about the project and only found out about the project through other neighbours.



## 8. Community benefits – inequality of a transition to renewables

- Community benefits are inconsequential considering the size and value of the projects. They appear as no more than a formalised attempt at bribery of local Councils. The funds will not be used to directly compensate adversely impacted landowners surrounding renewable energy projects, whose land values will be decimated. We have evidence of a land sale being cancelled during the settlement period as a direct result of an adjoining proposed wind farm/factory and location in a REZ.
- There is an absence of direct unincumbered compensation for surrounding impacted landowners.
- Inequitable community benefits fund distribution where an energy development falls over two local government areas (LGAs) such as the proposed Burrendong Wind Farm/Factory. E.g. despite the majority of impacted residents and landowners being in the Mid-Western Regional Council LGA, money from the Community Benefits Fund for the Burrendong Wind Farm will be allocated based on land area and turbine count, favouring the Dubbo LGA. This distribution overlooks the disproportionate impact on Mid-Western residents due to the close proximity of their dwellings to turbines and the fact that road access during construction will also disproportionately impact them. Whereas, Dubbo LGA residents will have a much larger separation from proposed wind turbines separated by Burrendong Dam.
- Rural landowners are being forced to pay for the transition to renewable energy. Land values are plummeting, wind energy land valuation studies referred to by Government and proponents are grossly outdated given the tripling in size and megawatt power of turbines since these studies were produced and the fact that they have been proven to be technically flawed. (A technical review identifying flaws in these studies can be provided on request, prepared by Nigel Wood).
- In Denmark property owners subjected to transmission lines and turbines are unable to get bank loans. There has already been a similar instance in Australia. Buyers cannot access bank loans to buy land subjected to such infrastructure either. **How is this fair or equitable that rural landowners who are being forced to pay for this energy transition?**
- **It is not just landowners hosting infrastructure it is also surrounding landowners.** Surrounding landowners are getting practically ZERO compensation for adverse impacts. Such as 250m high turbines proposed 50m from their property boundary, increasing bushfire impacts and insurance premiums to unaffordable levels. Signing up for a standard neighbour agreements of a grossly inadequate compensation amount (daylight robbery) means landowners are also silenced from impacts such as nuisance noise and due to non-disclosure clauses imposed by proponents. A couple of thousand dollars on offer per year in no way will covers the loss of property value and enjoyment of their properties.
- The Valuer General has recently increased land values by almost triple in the suburb of e.g. Yarrabin, NSW which has a direct impact on rate payments, yet the Valuer General has absolutely ignored the fact that the land is now located in a REZ and lifestyle

property land is being surrounded by several REZ project proposals including 250m high wind turbine factory proposals and a Pumped Hydro Battery Facility etc. And also the fact that land sales of neighbouring properties have been boycotted due to these projects. So Council gets community benefit payments PLUS rate rises – and impacted neighbouring landowners cop all the costs and financial ruin!!!

- Surrounding landowners must be fairly compensated. Compensation discussions should occur upfront at the outset of a project. In the case of 250m high turbines, this should include all surrounding landowners with dwellings out to 6km from turbines at a minimum. And compensation should not prohibit objections to a proposal.
- Community benefit funds will not be equitably directed to fairly compensate adversely impacted landowners surrounded by e.g. industrial scale wind turbine developments. Or landowners who are forced to host infrastructure.

## **9. Loss of trust in alleged “independent” consultant reports supporting project proposals**

As noted by the AEIC on their website headed: ‘Observations and Recommendations (updated) – Use and selection of Experts’: *“It is very common practice that experts engaged to perform the design and predictive assessments during the planning phase are the same experts engaged by the developer to perform the post-construction assessments. Developers may also often use the same experts on multiple projects, establishing long-term relationships between the parties.”*

We assert that consultants respond to the incentive of being selected for further work with the proponent which encourages consultants to provide biased assessment reports in favour of their employer.

It is requested that a new consultant selection process is set up by relevant Government departments so that consultants producing visual, social, acoustic and environmental assessments etc for e.g. wind farm proponents are independently selected by Government.

This selection process could involve consultants applying to Government to be on an accredited panel or list with standardised job costs. The relevant Government department would then independently select a consultant to work on a proposal (paid for by the proponent). This should break the link and temptation for consultants to provide biased assessment reports in favour of wind developers to secure ongoing work. This would also improve the loss of social licence and trust of impacted communities and landowners.

Government (e.g. State Government planning departments) could also establish a rating/ranking system of consultants, informed by Government department reviews of consultant reports during the wind farm assessment process. Consultants that produce high quality work with minimal technical errors and complaints from affected parties may increase their chance of being selected for future tenders.

Consultants and wind farm proponents should also be required to maintain publicly available up-to-date conflict of interest declarations (that are subject to Government audits), to ensure bribes are not paid by wind developers to consultants in exchange for favourable assessments outside of the recommended tendering and selection process.

It is well known in the industry the EIS's can easily be manipulated in favour of paying proponents.

The lack of fair non-biased independent assessments accompanying wind farm proposals is currently a major failure of the guidelines and has a hugely adverse impact on the ability of renewable energy proponents to gain a social license, as is clearly acknowledged by the AEIC. Amendments to guidelines and associated procurement processes and auditing procedures should take steps to resolve this issue.

As stated by AEIC: *"There is certainly scope for a clearer separation between the experts used for the predictive assessments, during the design/application stage, versus the experts used for the post-construction assessments of a project, along with the inclusion of independent audits of the expert's reports. A more rigorous process would yield a range of material benefits, including minimising costly expert errors made during the assessment phase, minimise or eliminate perceived or real conflicts of interest and give all stakeholders greater confidence in the integrity and reliability of the expert's advice and reports."*

We also have serious concerns with the direct conflict of interest where consultants engaged by e.g. NSW DPE to work on the review of the NSW Wind Energy Guidelines were concurrently producing work for wind energy proponents within the CWO REZ. E.g. Moir Landscape Architects were concurrently getting paid by and producing visual impact assessments for (amongst others) ACEN's Valley of the Winds, Tilt's Liverpool Range, Ark Energy's Burrendong, Squadron Energy's Spicers Creek wind projects and are also providing services to NSW DPE for the guideline review. The new NSW Wind Energy Guidelines are clearly in favour of wind energy proponents, with submission points detailed by CWO REZist Inc and Burrendong SOS absolutely ignored by NSW DPE.

#### **10. Wind Turbines - A mandatory 6km (ideally 10km) upfront minimum setback of residences to turbines is required to improve community engagement and acceptance**

It would be fair to say that there has been little agreement in relation to standards. The development assessment and approvals process for wind projects in NSW and across Australia has been beset with acrimony, community division, discord and distrust. Complaints lodged with the Australian Energy Infrastructure Commissioner and the NSW Department of Planning and Environment (NSW DPE) provide ample supporting evidence of this. Burrendong SOS and CWO REZist Inc have repeatedly requested a minimum 6km setback in an attempt to alleviate and significantly reduce adverse impacts on communities and landowners, especially those located within REZ's.

In this regard, we require that wind farm proponents may only locate turbines within 6km (ideally 10km) of non-associated residences IF they successfully negotiate commercial agreements with impacted landowner/s, and evidence of these signed agreements are submitted with the preliminary scoping document to e.g. the NSW Department of Planning and Environment (NSW DPE), prior to issuing of the SEARS. Or alternatively require a 5km setback from adjoining non-associated property boundaries to turbines, whichever is the greater.

We request this setback requirement be retrospectively applied to all wind projects currently under assessment by State Government.

#### **6km Setback Justification:**

- a) Determining setbacks should not be left in the hands of 100% profit-driven wind energy corporations. Our lived experience has taught us they cannot be trusted to consider and minimise adverse impacts on the residents of the area.
- b) Currently ‘independent’ setback determinations are left to state governments like NSW DPIE to make a call at the very end of the assessment process. **This means several years of stress, anxiety and uncertainty for the future is inflicted on non-associated landowners, producing entrenched opposition to wind projects across the board.** In this regard, the guidelines must be amended to require a mandatory upfront 6km setback requirement to eliminate this impact.
- c) Wind energy guidelines Australia wide need to protect landowners from years of fear, uncertainty and destruction of land values, that is:
  - o Fear of adverse impacts – nuisance noise (E.g. the Bald Hills Wind Farm Court Case, Victoria 2022), conversion of natural landscape to an industrial one; red flashing lights destroying local ecosystems and enjoyment of the night sky, EMF and BPA contamination etc;
  - o Years of uncertainty for a future on the land if turbines are approved too close to houses is currently stifling landowner investment in their properties and farms.
  - o Uncertainty of the location of turbines on a neighbouring wind factory proposal with turbines proposed too close to a neighbouring property, directly destroyed the sale of the neighbouring property during the settlement period (evidence available).
- d) A 6km setback would give landowners forcibly located within REZ power stations some certainty and relief, significantly reducing the cumulative social impact of having to be across the detail of multiple projects simultaneously for several years in order to ensure basic considerations to reduce adverse impacts on them.
- e) Study findings of Sullivan, et. al, (2012): Wind Turbine Visibility and Visual Impact Threshold Distances in Western Landscapes - a study that is referenced in the current NSW Visual Assessment Bulletin, provides a strong supporting argument for a 6km minimum upfront setback of turbines to dwellings.

***Summary of Observations with Visibility Rating of “6”***

*Maximum observed distance: 6.4 km (4.0 mi)*

*Minimum observed distance: 0.8 km (0.5 mi)*

*A visibility rating of “6” describes facilities that are a major focus of visual attention, but also of such large size that they occupy much of the observer’s field of view and cannot be “taken in” in one view; i.e., the observer’s head must be turned significantly to see the entire facility in focus. In these situations, the wind facility is a commanding visual presence that may completely fill or exceed the visible horizon in the direction of view. This rating level is ultimately dependent on the size of the facility in view, and thus is context-specific, but is useful as an indicator of likely perceived impact, as a rating of “6” would almost always correspond to a major visual impact. In this study, the maximum distance at which facilities received an average visibility rating of “6” was 6.4 km (4.0 mi), with several observations receiving ratings of “6” by some observers up to distances of 9.7 km (6.0 mi).*

This study was based on 120m high turbines - less than half the height of today's 250m up to 300m high turbines.

- The study observes the highest visibility impact rating of “6” for 120m high turbines setback a maximum observed distance of 6.4kms.
  - A visibility rating of “6” describes turbines that are of such a large size that they are a major focus of visual attention. In these situations, the wind facility is a commanding visual presence that may completely fill or exceed the visible horizon in the direction of view and would almost always correspond to a major visual impact.
  - In the study, the maximum distance at which facilities received the highest average visibility rating of “6” was 6.4 kms, with several observations receiving ratings of “6” by some observers up to distances of 9.7 kms.
  - Considering the outcomes of this study, a far greater mandatory setback of turbines to homes than 6km could be supported for 250m to 300m high turbines.
- f) A 6km setback would reduce assessment timeframes and staunch community opposition, which would be of benefit to the NSW DPE and the Federal Government by alleviating community landowner fears over impacts, reducing the number of highly impacted landowners, freeing up staff from extensive submissions and site visits, reducing assessment costs and timeframes.
- g) A 6km setback would dramatically reduce the destructive impact wind projects have on rural communities – currently pitting neighbour against neighbour – creating inequity and division. Rural communities and landowner relationships are currently being destroyed by wind farm prospectors, proposals and projects. A clear minimum upfront setback of 6km would significantly reduce the division created, and ensure wind proponents fairly compensate non-associated landowners, if said landowners are willing to negotiate a commercial agreement in exchange for the location of turbines within 6km of their homes.
- h) The Draft 2011 NSW Wind Farm Guidelines, required an upfront assessment for turbines proposed within 2km of residences. Since 2011, turbines have nearly tripled in height and tripled in megawatt power, making a required mandatory minimum upfront setback of 6km (ideally 10km) a fair and reasonable requirement in 2023.
- i) The Mid-Western Regional Council Development Control Plan (DCP) 2013 (notably produced before turbines tripled in height and megawatt power) Section 4.6 of this DCP should be given serious consideration, as the standards adopted represent the Council and communities' expectations for such development and were the outcome of extensive community and stakeholder engagement within the CWO REZ. Section 4.6 of this DCP requires:
- Turbines shall not be located within 5.0 kilometres of any dwelling not associated with the development or from any lot upon which a dwelling may be constructed. The 5.0 kilometre setback proposes utilising a precautionary principle in addressing perceived visual, noise and health concerns.

- Turbines shall not be located within a distance two times the height of the turbine (including the tip of the blade) from a formed public road. A greater distance may be required by the road authority.
  - Turbines shall not be located within a distance of 2.0km from a non-related property boundary.
- j) A 20km setback for the Federal off-shore REZ from Central Coast to Port Stephens NSW is now proposed - to alleviate visual impacts on coastal residents. Whilst we acknowledge that offshore is Federal and onshore is State, it highlights the fact that land-based residents are currently subjected to negligible minimum setbacks in NSW. This is grossly inequitable.
- k) Buffalo County, Nebraska USA in March 2023 unanimously voted to approve distancing rules that were recommended by their planning commission to require a 3mile (nearly 5km) setback from rural residential property boundaries to wind turbines. This generally aligns with our requested 6km setback of turbines to residences.
- l) Social Impacts Considerations – Locating turbines within 6km of houses can have the dramatic impact of displacing some families from their homes and communities, contributing to the NSW Housing Crisis.

A recent Canadian study - Wind Turbines: Why Some Families Living in Proximity to Wind Energy Facilities Contemplate Vacating Their Homes (2020) has gone some way to understanding this phenomena, with data analysis lending support for the theory that surrounding landowners decisions to vacate their land and multigenerational family homes have been motivated by the proximity of wind energy facilities within 10km of homes and their observations of the occurrence or potential risk of adverse health effects.

Research is significantly lacking in this regard – however a general observation is that houses have notably been evacuated / left vacant surrounding operating wind farms.

A 6km (ideally 10km) minimum upfront setback of turbines to homes would go some way to reducing wind projects adverse social impacts such as: a profound sense of loss; impacts related to social justice, rights, personal security; grief, displacement, anger, bitterness, mistrust in government, stress and anxiety; financial distress, losses and hardship; impacts on employment; and adverse impacts on personal and community relationships.

- m) Larger regional towns such as Dubbo and Tamworth have already put in place a 10km distance for wind/solar projects, but this set back has not been afforded to smaller towns or rural residences.
- n) In line with this set back, shielding of all aviation hazard lighting should also be extended from the current two kilometres to 6km, in line with the tripling in size of turbines, with an option to increase this distance if turbines keep increasing in size/rotor diameter.

Being mindful that light shields that direct lighting towards the ground will have adverse impacts on rural residences located in valleys below and in close proximity to turbines on ridgelines above them, destroying their enjoyment of the night sky and residents ability to get a good night sleep.

- o) The 6km (ideally 10km) setback, should also be provided to create a buffer to offer environmental protection to our native species, especially where there are known habitats of e.g. koalas, wedge-tailed eagles nesting sites and micro bats etc. A precautionary principle should apply, notably where studies have not been undertaken to determine cumulative impacts. E.g. low frequency sound emitted from turbines is likely to impact a Koala's ability to communicate and mate, as their mating calls are also low-frequency enabling their calls to travel long distances. Also, how will turbine lighting and noise impact on Koala habitat - will it become uninhabitable for Koalas?

**11. Mandatory provision of photomontages to landowners surrounding wind turbine proposals – to improve community engagement**

- a) Wind proponents should be required to offer and provide photomontages (hard copy and digital) for all surrounding landowners out to 10km from proposed turbines early in the process, to inform, engage and seek preliminary input into the siting and design of turbines from surrounding landowners.

This is required as it is **impossible** for landowners to understand and provide preliminary feedback on siting and design in an attempt to minimise visual impact on them from proposed e.g. 250m high turbines via an analysis of turbine dots on a site map, which is the standard grossly inadequate level of engagement/ consultation currently provided by wind proponents to surrounding landowners.

- o Photomontages and visual impact assessments must be offered/provided from ALL landowners residences. If there is no existent residence, a photomontage should be provided from a location of the landowner's choice (e.g. They may be planning to build on their land in the future).
- o Photomontage/s and supporting information provided by wind developers to landowners must meet a basic list of requirements clearly specified in the guidelines (e.g. photomontage content criteria). If proponents don't meet requirements, they should be penalised for failure to adequately inform surrounding landowners of proposed visual impacts.
- o Landowners should be given a formal opportunity to submit preliminary siting and design feedback to proponents, based on their consideration of preliminary photomontages. Proponents should clearly stipulate how this individual feedback has been considered and/or integrated into the siting and design of turbines in a proposal, to reduce adverse impacts on each impacted landowner and gain trust that their input has been appropriately considered.
- o Any modifications to siting/ design/ layout of turbines should be advised via notification of landowners out to 10km and updated photomontages should be provided on request, prior to proponents Environmental Impact Statement submissions to e.g. NSW Department of Planning and Environment for public exhibition.
- o Photomontages should capture ALL potential wind turbine views, not just in the proponents opinion of the worst- case location.

- b) Provision of photomontages to illustrate an assessment of cumulative visual impact must illustrate turbines that extend beyond 8km up to a minimum of 20km within a REZ – in line with the increased size of the turbines and the large project areas subject to increasingly bigger developments.

The maximum 8km cumulative setback analysis of recently updated NSW Wind Energy Visual Assessment Bulletin states that *“The application of the cumulative tools to a distance of eight kilometres from a dwelling or public viewpoint is based on visibility research conducted by Sullivan<sup>5</sup> et. al. (2012), Bishop<sup>6</sup> (2002), Shang and Bishop<sup>7</sup> (1999) and others. At eight kilometres, turbines and objects recede into the background in terms of visibility.”* This however is not in fact supported by the Sullivan et.al study referred to in the current NSW Visual Assessment Bulletin, this study is more likely to support assessment of cumulative visual impacts out to 20km.

Visual impacts from turbines located on top of ridgelines are much greater than on flat terrain. For example, wind turbines located north-east of Wellington are clearly visible at over 30km from Wellington, on the major road from Molong. Noting the AEIC statement that *“Based on our complaint handling experiences, the Commissioner has found that locating wind turbines on the top of hills or ridges, while optimum for capturing the wind resource, can have greater impacts on visual amenity, may lead to specific noise and shadow flicker scenarios for residents in the valley beneath and may have other associated impacts on the community. Access roads for hill and ridge wind farms can also be obtrusive and significantly damage and constrain the remaining available farming land in the area. Conversely, there appear to be minimal issues raised to date about wind farms that are located on large land holdings, or on flat or slight to moderate undulating land and sites that are well away from neighbours and towns.”*

The 2016 NSW Wind Energy Guidelines state that: *“Where wind turbines are visible within the horizontal views of the dwelling or key public viewpoints in three or more 60° sectors, the proponents must identify the turbines, relative dwelling and key public viewpoint, along with the relative distance and submit these to the Department as part of the request for SEARs. These turbines will become a focus for assessment in the EIS”*

In a REZ situation, there are multiple projects impacting residents, e.g. Some landowners in the Coolah district will have 2 wind projects within 8km and will see over 200 turbines from both developments, this is 2 sectors from one and 3 from the other. **Standards need to put in place to protect REZ residents from overdevelopment of multiple wind projects and NSW DPE can reject (not negotiate) proposals that go against these standards.**

- c) Landscape assessment values should be determined by impacted landowners and the local community, not wind energy proponents.
- d) Vegetation screening as mitigation needs to be reconsidered.
- Newly planted vegetation takes many years to grow, often longer than the life of turbines and will not screen turbines as high as 250m (up to 3/5km on ridgelines) above dwellings.
  - If vegetation screening is proposed, this must be accompanied by a Bushfire Assessment Report, ensuring Bushfire Asset Protection Zones align with e.g. the



NSW Planning for Bushfire Protection Guidelines (including analysis of ability for landowners to evacuate their property in the event of a fire and/or shelter in place).

Proposed new vegetation screening, if agreed to by landowners, should be multiple rows and should include not just the supply and planting of the vegetation but the watering and care of vegetation until established, as the responsibility of the proponent.

## **12. Community surveys and focus groups**

Community surveys and focus groups need to have non-biased representative cross sections of the community affected - neighbours, hosts, non-associated local residents etc. This should be clarified in the results and should be reflected in the numbers surveyed. E.g. 1% of the population as hosts should only have 1% of the number of the consultations. Numbers consulted should reflect the population density of the area out to 20km. Many proponents think consultation is a minimal number (e.g. 30-50) people, but to encourage compliance by proponents, a % of the local population should be specified.

## **13. Wind development decommissioning requirements**

To improve social licence with communities and surrounding landowners, there must be a watertight Government guarantee that wind developments will be decommissioned and removed from land at the end of their life. Verbal statements that decommissioning will occur does not cut it.

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 and bushfire risks and ongoing impacts for surrounding landowners and communities.

As it stands now, the cost of decommissioning 100m to 150m high turbines is approximately \$600,000 to \$700,000 per turbine. The proposed increases in turbine heights to 250m up to 300m will increase decommissioning costs dramatically in addition to inflation over a 20 to 25yr period.

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 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 a number of 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 licence 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.

Wind farm decommissioning agreements should form part of the public consultation/ engagement process and be made publicly available.

#### **14. Standardised host agreements, neighbour agreements and information handouts prepared by Government, with mandatory distribution by proponents**

We suggest that Government provides and maintains a standard template for agreements and an information handout which proponents must be legally obligated to provide, upfront, to potential hosts and surrounding landowners.

This would provide further information for landowners and ensure they are not presented with unfair and unreasonable conditions as outlined by the AEIC. *"The Office has observed some proposed neighbour agreements that contain clauses which may not be fair and reasonable to the neighbour. Such clauses observed include the right for the project not to conform to the permit conditions that would normally apply to the neighbour (including noise levels and shadow flicker), the ability for the developer to terminate the agreement while the project is still operating – either without cause or with questionable cause – as well as clauses that could be construed to restrict the neighbour's right to make a complaint. Further, some neighbour agreements seek to impose stringent planning restrictions on the neighbour for any new development or construction on the neighbour's property. The Commissioner's view is that these clauses are unnecessary and the neighbour should simply be required to comply with the planning rules and laws of the jurisdiction."*

*“Inclusion of perceived unfair clauses by the developer can significantly impair the ability to negotiate a fair and reasonable agreement, creating distrust and anxiety amongst neighbours towards the proponent.”*

Additionally, all contracts with host landowners and surrounding landowners must be made publicly available - Transparency is essential.

## **15. Removing the ban on Nuclear**

Nuclear is Co2 free!

Nuclear will have a far smaller land footprint compared to a never-ending sprawl of wind turbines, solar panels, batteries and pumped hydro dams, access roads and associated transmission lines and mining etc covering our bush, oceans and agricultural land, destroying our agriculture, tourism, local ecosystems and communities.

We are never going to need less electricity, demand will continue to increase and under the current highly subsidised renewable energy directive, renewable sprawl will continue to cover and destroy the Australian landscapes, ecosystems and communities.

The amount of landowners and communities affected by the renewable sprawl directive is extensive, and opposition and civil unrest is exponentially increasing with it. People’s families, livelihoods, health and lifestyles are under direct threat across the board.

Nuclear located within existing decommissioned coal fire power stations, utilising existing transmission line infrastructure would significantly reduce the level of impacted communities opposing renewable sprawl that is growing across Australia.

Nuclear would significantly reduce the number of unique ecosystems and the amount of agricultural land destroyed by renewable sprawl. The cost of nuclear would also be more equitably covered by all Australians, instead unfairly burdening rural landowners land with the cost of this transition.

We must remove the ban on Nuclear immediately – it must be considered as part of the energy mix.

We must remove the Australian Government’s commitment to increase the amount of energy produced from renewable energy sources to 82% across the National Electricity Market by 2030. This is driven by ideology and will devastate our economy, ecosystems and communities.

## **16. Biodiversity**

Siting wind turbines on high biodiverse, old growth landscape is appalling. Habitat now more than ever must be conserved. We should conserve what’s left of our remnant, ecologically thriving habitat.

- The EPBC legislation on does not factor in the cumulative impacts of habitat destruction for the vast number of renewable developments within a REZ.
- Australia has the worst mammal extinction rate of any country in the world. We will drive more species to extinction with poorly considered wind farm siting.

- Raptors such as the Wedged Tail Eagle are particularly vulnerable to turbine strike. Even if only a few breeding adults are killed by wind turbines a year, that is enough to impact a regional population. Raptors are slow-breeding and healthy adults are critical to a population. It is highly likely a high concentration of turbines proposed across the he CWO REZ, will contribute to the regional extinction on of the Wedged-Tail Eagle.
- In Victorica, survey data suggests thousands of bats die annually due to wind farms. One expert estimates 12,000 to 40,000 bats are killed from wind farms per year. Our area is home to many species of bats including endangered microbats (key pollinators for the region) and they won't fare well with so many wind farms and no effective mitigation measures in place. Mass deaths of bats from changes in barometric pressure exploding their lungs will up-end the ecosystem of the CWO REZ.
- Once old growth habitat within C3 Environmental Management Zones etc are cleared for big wind developments, weeds are introduced. Feral pests gain easy access to the site with newly created haulage roads and a diminished Wedged-Tail Eagle (Apex Predator) population.
- Wildlife can exhibit unusual behaviour around cleared margins of formerly intact habitat, known as the "edge-effect". This edge-effect can impact breeding patterns and other wildlife behaviour in unforeseen ways. Connectivity shrinks and the health of individual biomes is impacted.
- The infrasound of wind turbines may mask mating calls of Koalas –no research has been conducted on this potential impact.
- The fragmentation of habitat for wind farm haulage roads exposes smaller species to increased aerial predation, impacting the ecological health of the landscape.
- The siting of a wind farm is critical. They should not be sited on high quality environmentally significant habitat that is zoned for environmental management as this poses too great a risk to biodiversity. **The precautionary principle must apply.**
- The scale of habitat clearance in the CWO REZ for renewables is alarming. It renders many other conservation issues trivial.
- ***Biodiversity Offsets are a SHAM:***
  - Habitat isn't interchangeable, nor can it be offset. All habitat harbours life.
  - Wildlife relocation doesn't work. Once wildlife is relocated it usually dies as other wildlife already inhabits that area.
  - Denning trees are critically endangered. Tree hollows provide homes for many species including Greater Gliders. They take over 100 years to grow. Destroying denning trees for wind turbines makes no sense.
  - Proponents claim the land and waterways will be rehabilitated. We find this claim dubious. It is likely to cost millions of dollars to revegetate steep and tricky terrain. Proponents will be long gone after on-selling the development approval, and there will be no money securely set aside upfront for future rehabilitation.
  - Once old-growth habitat is cleared, it will never return. Weeds will be introduced, wildlife will be displaced and likely killed.
- ***Wind Turbine Noise impacts on Koalas and other Native Species***

It is imperative and critical given the proliferation of wind farms across REZ's, NSW and Australia that long term independent studies are conducted into the cumulative impacts of Wind Turbines - low frequency noise, EMF, lighting and land clearing etc on the future

of Koala populations and other native species health and fertility - Can they healthily co-exist with wind turbines? What is the cumulative impact?

It appears that no such long term independent study or any Koala impact study on this has been undertaken to date! Koala populations are under threat across NSW from a proliferation of Wind farms and we do not know what impact they will have on Koalas!!!

Wind turbines could have a far wider range of impacts on Koalas than just habitat vegetation clearance. What if Koalas cannot co-exist and procreate within 10km-20km of low frequency noise & EMF emitting turbines? What if the noise, EMF and lighting they emit stresses Koalas to such an extent it prevents or dramatically reduces their breeding capabilities?

As documented in the paper “Noise pollution from wind turbines and its effects on wildlife: A cross-national analysis of current policies and planning regulations” published in October 2022. ([Noise pollution from wind turbines and its effects on wildlife: A cross-national analysis of current policies and planning regulations or Redirecting](#) )

The paper specifically states “A growing body of evidence suggests that anthropogenic noise may detrimentally affect wildlife populations, communities, and ecosystems. The current, substantial development of renewable energy infrastructure, specifically wind turbines (WTs), has created a relatively new concern that wind turbine noise (WTN) might adversely affect wildlife. This requires the attention of scientists and planners alike. While impact injuries that WT blades cause to birds and bats have received much attention in the literature, the effects of WTN on wildlife remains insufficiently explored”

They go on to say “In general, it has been shown that noise pollution affects species demography (i.e., community composition, population density) and promotes habitat avoidance (because noise alters animals' habitat selection. Several studies have demonstrated the impact of WT on demography and habitat avoidance, mostly in birds (but also in other taxa such as mammals). Very few studies have been able isolate and connect habitat avoidance specifically to WTN (but Lehnardt et al. (in review) recently teased apart the effects of WTN on songbirds experimentally, by broadcasting the sound of a wind turbine in the field and showing that this significantly reduced the number of birds present. Furthermore, the existing literature implies that WTN alters birds' vocal communication, with possible implications for reproductive success.

Buxton and colleagues argue that protected areas experiencing high levels of noise pollution must be identified and managed appropriately, and that noise pollution merits consideration as a serious threat to biodiversity. Moreover, Francis and Barber suggest that noise pollution must be addressed using a combination of tools, technologies, and techniques, many of which are already available. They also advocate to include considerations pertaining to noise pollution in the planning and management of protected areas, adding that different types of noise can affect wildlife in various ways. Despite the current dearth of studies examining the direct effects of WTN on wildlife, there is already sufficient knowledge accumulated on the impacts of noise pollution, and the effects of WT on avoidance behaviour in birds and mammals in response to the spectral properties of WTN. “

They conclude that “Planning regulations are yet to address the issue of WTN impact on wildlife, despite accumulated evidence to suggest that anthropogenic noise generally, and WTN particularly, are responsible for actual and potential harm to animals and

consequently to ecosystem function. ... tools intended to protect humans from WTN, such as acoustic surveys, could be used as a basis for addressing and minimizing detrimental effects of WTN on wildlife species.

Scientific advances in this field, including technologies that allow for long-term acoustic monitoring in the field, or studies that follow animal movement, behaviour, and survival before and after broadcasting simulated WTN, would be another valuable asset for planners and environmental advisors. Surveys of local species' noise sensitivity make valuable contributions to the understanding of the impacts of anthropogenic noise, including WTN, and are already available in Germany, and have the potential to inform, and even change, planning processes for WT. "

Additionally, Roger Martin, wildlife biologist in North Queensland believes that low frequency sound (as produced by wind turbines) could interfere with the breeding potential of koalas by interfering with their mating calls.

*"male koalas bellow during their summer breeding season. It is a very low frequency sound (110 to 750 Hz) which can be heard from a long distance away, particularly on cool, windless nights. We also know that the koala's tympanic bullae (the bony capsules which house their inner ear) are very large and in other animal groups the hypertrophy of this structure is associated with enhanced acuity to low frequency sound. So it is highly likely that the hypertrophy of koala's tympanic bullae enhances their ability to hear low frequency sound as well. We know that these bellows of the male koala attract females, particularly when they are in oestrus, and so we reason that this call is important and enables males and females to find each other to mate. We further reason that it would be particularly important in low abundance populations. I don't know what your situation is but up here on the Atherton Tablelands we are dealing with abundances in the order of 1 koala/10 sq km. I know it sounds like fantasy but the population is breeding. The males wander around over huge areas (> 20 sq km) bellowing repeatedly during the breeding season. I'm suggesting that their ability to make and hear low frequency sound is what enables these low abundance koala populations to persist.*

*Wind farm companies seldom admit it but the acoustics literature leaves no doubt that wind turbines make low frequency noise. It is particularly intense when the blades cut through turbulent air. This noise mainly is between 10 and 1000 Hz in frequency and I argue that it will mask koala bellows and impact on their breeding success, particularly in low abundance populations."*

## **17. Bisphenol A (BPA)**

Despite the issue raised as a concern by community, the NSW Government has failed to address the fact that BPA is a highly toxic synthetic organic compound used in the epoxy resins of turbine blades. Epoxy resins contain 30-40% BPA and turbine blades are the largest global consumer of epoxy resins.

BPA is an endocrine disrupter that has been linked to about 80 diseases including cancers and reproductive disorders. It can be lethal for young children. In 2012, the World Health Organization warned about the potentially carcinogenic properties of endocrine disrupters and concluded that they pose a global threat to public health. The European Food Safety Authority has massively reduced by 1,000 times the dietary intake of BPA to one hundred millionth of a gram per kilogram of body weight per day. All this is public record information.

The leading edges of turbine blades shed fine BPA dust as blade edges erode over time. According to Senator Gerard Rennick – Federal QLD, each blade sheds a minimum of 0.2 to 2.5 grams of BPA in dust per year. This dust is spread wide and far by wind.

If one gram of BPA gets into dam waters (such as Burrendong Dam, NSW which is proposed to be surrounded by wind turbines), 10 million litres of water are rendered unusable. Over the life of a turbine, this equates to pollution of half a trillion litres of water per turbine.

BPA dust from turbines will leach into soils, waterways and blow into the drinking water tanks of surrounding landowners and food producing land. This is a toxic timebomb. Burrendong SOS and CWO REZist Inc. do not consent to BPA toxicity resulting from wind farm developments. This will be equivalent to a PFAS disaster of the future.

**Projects must only be approved with a mandatory condition of consent that requires that turbine blades are BPA free.** Ongoing toxicity monitoring of neighbouring landowners water tanks for BPA and river systems and e.g. the Burrendong Dam, NSW must also be required.

Without putting too fine point on it, there are significant impacts that the NSW DPIE appears to have failed to recognise as regards this scheme.

#### **18. Unfair charges for Freedom of Information Requests within REZ's**

Burrendong SOS and CWO REZist Inc. were shocked by the \$930 price tag for a basic GIPA - Freedom of information request from the NSW Government in August 2023.

Burrendong SOS previously lodged a similar GIPA request with Mid-Western Regional Council and was only charged \$30 for roughly over 50 documents. The request to Mid-Western Regional Council was very similar to the GIPA request lodged with the NSW Government:

Being forcibly located within the CWO REZ that was approved by the State Government in 2021 without our consultation nor consent, forcing families to live within a 'modern day power station' as aptly described by the NSW State Government., our properties are being surrounded by several industrial energy projects proposed by predominantly foreign-owned multinational corporations such as Vestas (Piambong Wind Farm), Ark Energy-Korea Zinc (Burrendong Wind Farm) and Phoenix Hydro Burrendong. We may need to undertake GIPA requests on several projects impact us.

The Australian Energy Infrastructure Commissioner called for greater transparency & community engagement in this transition to renewable energy in its scathing report released February 2024; <https://www.dcceew.gov.au/sites/default/files/documents/community-engagement-review-report-minister-climate-change-energy.pdf>

Pricing us out of freedom of information GIPA requests does not aid transparency and disadvantages rural communities located within these 'modern day power stations' who are concurrently impacted by several projects at once. Noting the CWO REZ has 54 such projects currently in the pipeline!!!

Notably, we should not have to pay for the State Government to save project information relating to one project into a standard project folder. It should not cost hundreds of dollars to locate project information from that project folder to respond to a GIPA request.

Landowners located within REZ's should be exempt from inequitable GIPA request fees and charges.

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Thank you for your consideration. We would welcome the opportunity to discuss this further and are happy to provide further documents/ evidence supporting matters raised in this submission on request.

Sincerely,

Burrendong SOS Representative.

**References:**

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