

Not anti-renewable

For the Record.

Yass Landscape Guardian group is not an anti-renewable organisation nor are we are not Pro-Coal.

What we seek is changes to Landuse Planning in NSW which will protect the rights of rural people and the integrity of our landscape.

We seek national energy policies that allow fair and true market forces to operate, and the removal of wind energy subsidies and their market distortion affects.

Coppabella Modification Risks

Introduction

Wind energy represents one of many renewable energy alternatives which is rapidly being adopted in all Australian States and making a significant impact on the Australian landscape.

Some features of the Coppabella Modification and the wind industry more generally are:

- The vast majority of wind energy proponents are overseas companies;
- The towers, blades and turbines are largely imported, with limited Australian construction;
- The towers need significant footings, all weather service roads, the clearing of power line easements, and clearing for sub-station establishment;
- The proponent has claimed “job opportunities”, the reality is most of the Australian based employment opportunities occur during construction and sourced from major construction firms based in capital cities, the construction period will only last two years, permanent employment is limited to ongoing field maintenance (generally regionally based), with control centres located in capital cities.
- Project life is typically quoted as 20 to 25 years. Most of us here will not be around to witness if the proponent honours its decommissioning obligations or not. Unfortunately not enforceable legal third party bond requirements apply to this modification.
- This flags to our group how critical it is to get this 2018 decision right. It’s the IPC’s obligation to apply a wise and precautionary decision for the benefit of our children and grandchildren.
- Wind Energy generation is “intermittent”, with limited capacity during periods of very low and extreme winds; and the modification is not supported by energy storage.

- The Wind Industry generally has met with a significant community and political backlash both internationally and in Australia; at a much greater level than the resistance applicable to other renewable alternatives such as solar energy which have a minimal environmental footprint.

Coppabella: A historical Perspective

Prior to being Coppebella, this project was one precinct of the Yass Valley Windfarm. In early 2015 the NSW Government Refused the whole Yass Valley Windfarm proposal on the grounds that it was “not in the Public Interest”. Specifically the Epuron proposal was found to have the following deficiencies:

And we should reflect on these findings.

- 1. The Applicant's failure to demonstrate a consistent project design that can be wholly and feasibly constructed including the secure provision of interconnecting infrastructure and access across the site. This also includes the Applicant's failure to undertake an appropriate level of impact assessment of all aspects of the proposal.*
- 2. The Applicant's failure to demonstrate that the proposal will not have an adverse impact on either commercial or non-commercial aviation, including the safe operation of the Canberra and Albury airports.*
- 3. The development will result in unacceptable impacts on the biophysical environment as a result of inadequate avoidance of biodiversity, inadequate provision of mitigation measures, and a failure to adequately offset biodiversity impacts.*

To my knowledge the Yass Valley Wind Farm was the first Wind Energy Project, and still is possibly the only one to be Totally Refused by a NSW Government.

Prior to this refusal, Wind energy projects appeared to be a “tick and flick” through the Department of Planning as they were supported by government policy regardless of planning due process. The wind energy industry was emboldened by this lack of scrutiny.

Unfortunately in 2015 the then PAC threw this decision back at the Government, the Minister mysteriously “moved on”, and the officers of the Department suddenly “changed”.

The outcome of that department of planning “insurrection” was the reinstatement of the Coppabella precent, a new Minister of Planning and we welcomed Mr Mike Young as Director of Resource and Energy Assessments.

We should also reflect on why the IPC is here in Yass for the first time in a public forum in relation to this Project. The prior proponent did an appalling job of public consultation, and the only consequence of that appalling consultation was the minimum number of objections was not triggered by the close of the consultation period; therefore there was no PAC hearing! Essentially the NSW State Significant Project process rewards poor proponent performance.

I could talk all day on the failings of planning in NSW! What I would ask the current IPC committee to acknowledge that this Project has been on a **knife edge of acceptability** since inception, and was previously refused in total by a NSW Government.

New Project or Modification

Goldwind have requested a “modification”, the position of the Yass Landscape Guardians is that what Goldwind have requested is a “Whole New Project”.

The Goldwind Proposal involves:

- A 184% increase in the destruction of a Commonwealth and State listed Critically Endangered Ecological Community (Yellow Box Blakeley’s Red Gum Woodlands) **which you will see on Whitefields Lane**;
- I should also note the OEH have stated they believe the proponent has underestimated the area of environmental destruction.
- It involves a 17% increase in Blade Length, with all the associated implications for the adjoining landowners;
- It involves a 14% increase in overall height, with implications on landscape and the visual impact for the whole community;
- It involves a 36% increase in Fan Area (the Dead Bird Zone);
- In fact the so called “*Modifications*” are so significant that every proposed tower equates to 1.4 of the original towers based on Fan Area alone. Over 79 towers this equates to an additional **32 NEW WIND TURBINES**, of the original specification.
- NSW Department of Planning has argued that as the modification still involves wind turbines, towers and blades, legal precedent can be followed to consider the Goldwinds proposal as a modification. We reject this position.
- **How can the equivalent of 32 NEW WIND TURBINES be a modification?**

Under any test of common sense this is a whole new project (A Wolf dressed in a lamb’s skin)

Yass Valley Wind Farm (SSD 6698),			Original	Proposed	Difference	%
Critically Endangered Blakely's Red Gum White Box	Land Clearing	ha	63.8	180.9	117.1	184%
Blade Length	Additional Blade Flicker/Shadow	m	60	70	10	17%
Tip Height	Additional Landscape Damage (Height only)	m	150	171	21	14%
Fan Area (Total Increased Visibility)	Dead Bird Zone	m2	11,314	15,400	4085.714	36%
				Old Tower Equivalent		
Note: Every new tower equates to 1.4 old towers in terms of Fan Area				1.4		

Community Resistance

- Community Resistance to the Coppabella modification can be categorised into the following aspects and impacts:
 - Landscape Damage
 - Community Division
 - Environmental Damage
 - Wild Fire Risks
 - Health and Annoyance
 - Planning failure and the Wind Energy's failed business ethics
 - The Chernobyl Effect on adjoining landowners and shire development.

I can't possibly cover off on all these subjects in 15 minutes; and I know other speakers will address specific community concerns.

Community Safety and the Precautionary Principal

What I feel I must do however is remind the IPC of the "precautionary principal" in relation to this Modification and the WHS law of NSW.

Work Health and Safety Act 2011 No 10

Section 22: duties of persons undertaking design.

- (2) The designer must ensure, so far as is reasonably practicable, that the plant, substance or structure is designed to be without risks to the health and safety of persons:**
- (a) who, at a workplace, use the plant, substance or structure for a purpose for which it was designed, or
 - (b) who handle the substance at a workplace, or
 - (c) who store the plant or substance at a workplace, or
 - (d) who construct the structure at a workplace, or
 - (e) who carry out any reasonably foreseeable activity at a workplace in relation to:
 - (i) the manufacture, assembly or use of the plant for a purpose for which it was designed, or the proper storage, decommissioning, dismantling or disposal of the plant, or
 - (ii) the manufacture or use of the substance for a purpose for which it was designed or the proper handling, storage or disposal of the substance, or
 - (iii) the manufacture, assembly or use of the structure for a purpose for which it was designed or the proper demolition or disposal of the structure, or
- Example.** Inspection, operation, cleaning, maintenance or repair of plant.
- (f) who are at or in the vicinity of a workplace and who are exposed to the plant, substance or structure at the workplace or whose health or safety may be affected by a use or activity referred to in paragraph (a), (b), (c), (d) or (e).**

We feel, on the basis of Safety in Design, the IPC must reject Goldwind's proposal for 171 tall turbines on the basis of applying a precautionary principal in relation to the health and wellbeing of all adjoining stakeholders to this project.

Landscape Damage

- In inland NSW turbines are frequently located on ridgelines and hilltops, thereby dominating the rural landscape, and the reason why proponents do this in NSW is because of Marginal Wind strengths and optimising \$ return for the developer;
- The Coppabella Ridges, Black Range and Conroy's Gap have an iconic place in Australia's European heritage and folk law, being the subject of a number of famous Banjo Patterson poems;
- No other industry has been permitted to inflict such a high level of damage on the Australian landscape without some form of control or zoning.
- In coastal Australia and in Europe turbines are located at sea level or **off-shore** where wind strengths are strong, consistent and uniform.

As a community we are expected to sacrifice our Landscape Integrity for the sake of Goldwinds profits.

Environmental Damage

- Land clearing for tower sites, access roads, power line easements and substations and other infrastructure will have an unacceptable level of damage on the Critically Threatened Yellow Box Blackely Redgum woodland and a number of its threatened species dependent on this woodland;
- Other Wind Projects with significant clearing of this EEC have already been approved in the Yass district;
- **Numerous State and Federal conservation projects encourage farmers to preserve this EEC in the same district Goldwind propose to destroy it. This shouts out to me a total inconsistency of Government Policy and a failed NSW planning system.**
- The Coppabella ranges is a key habitat of the vulnerable Superb Parrot which is frequently observed in the area of Whitefields Lane.
- The Coppabella ranges are also likely habitat of the threatened Swifts Parrot.
- Blade Strike: will impact on birds and bats and most notably on raptors (e.g. Wedge tailed Eagle, Powerful Owl)
- Erosion of ridgeline tracks (the Wind industry is not regulated by road construction codes of practice as are other industries in NSW associated with rural land use)

A 184% increase in the destruction of a Commonwealth and State listed Critically Endangered Yellow Box Blakeley's Red Gum EEC represents an

unacceptable community outcome especially considering this estimate is potentially understated and does not acknowledge the cumulative impact the Wind Industry has had on this EEC as a consequence of other NSW approvals.

Wild Fire

- Turbines are subject to “turbine fires” with the potential to ignite bushfires;
- Turbine maintenance workers have been suspected of starting bushfires in Australia due to ignorance of rural bushfire restrictions around hot works, total fire bans and fire prevention;
- Aerial Suppression, a key tool used to fight bushfires in Australia is highly likely to be restricted by turbines due to turbulence and visibility.
- In 2014 the Bookham and Bowning districts were subject to a catastrophic bushfire that burnt from Jugiong to the outskirts of Yass, aerial suppression was heavily used in this fire. In 1910 a catastrophic fire destroyed all the buildings on my property and much of the Bookham district. These are just two example fires, many more exist.

Industrial energy facilities in our fire prone landscape represent an unacceptable risk to both the immediate stakeholders and the adjoining community. And a risk that cannot be controlled by the proponent.