

19/11/2018

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The Secretary

Independent Planning Commission NSW

Level 3, 201 Elizabeth Street

Sydney NSW 2000

Re Yass Valley Wind Farm Modification Assessment (SSD 6698 Mod 1)

This written submission is on behalf of myself and my wife Elesa Bennett as residents and owners of the property known as Garryowen.

We have made two previous submissions a letter dated 7/11/2018 and a by having Michael Chapman speak on our behalf at the Public Meeting held in Yass on the 12/11/2018.

I have viewed some photos and a video taken from a drone on 16/11/2018 and had a briefing from Matt Bingley regarding his visit to the site of on 13/11/2018 now known as Coppabella Wind Farm (CWF). I have attached the photos and a link to the video is: [https://youtu.be/Vxer\\_cp11LA](https://youtu.be/Vxer_cp11LA)

#### **Fragile Land and Significant impact on remaining Woodland**

The fragility of the landscape and the need for restoration to stabilise the mountain range is clear from the photos/video of the proposed site of the CWF. The construction and latter operation of the CWF will accelerate the degradation of the mountain range in a permanent manner.

Vegetation is scarce in the general area (as shown in the photos) so the proposed additional 111.5 ha to be cleared would be a significant proportion of the available vegetation. I do not have the detail of the total area involved but I encourage the Independent Planning Commission (IPC) to establish this figure, it is key to the survival of the habit and the fauna/bird life associated with it.

I note that no expert such as a geologist or civil engineer other than Mr Andre Filed has provided a report on the feasibility of CWF and how this project would be possible on such a fragile site.

Mr Andrew Field (Yass Earth Movers) at the Public Meeting in Yass presented a detailed assessment outlining that the CWF should not go ahead as it will cause significant erosion and general destruction to the Coppabella Range

#### **The area of the wind turbines that will be faced by bird life has increased by 38%.**

This is calculated as

Diameter 121m radius approved 60.5m this equates to an area of 11,499 sqm

Diameter 142m radius proposed 71m this equates to an area of 15,837 sqm

Net increase in the presented area that a bird might strike is 4338 sqm or 38%. This calculation does not consider the movement of the rotors however it does give an indication of the possible impact.

## **A detailed study needs to be taken following the Biosis Report approach.**

During the visit to the CWF site several Wedge-tail Eagles (WTE) were sighted

The report by Biosis Research Pty Ltd titled "Wind farm collision risk for birds" (Biosis Report) contains a modelling process to calculate an estimated risk. In this report it states that the average wind rotor diameter in Australia at the time of the report was 60 to 90 meters so the modelling would need to be adjusted as the turbines proposed are almost double. The Tasmanian WTE has a report detailed in this publication it states "Wind farms may pose a risk of collision to the eagle as bird mortalities are known from wind farms in a variety of situations world wide and a few WTE's have already been recorded as casualties of collision with turbines in Tasmania and elsewhere in Australia."

The birds sited during the visit to the CWF site on Tuesday were WTE's.

The report goes on to say "Breeding adults occupy home ranges year round and generally maintain life-long monogamous pair bonds." It goes on to say "It appears usual for home-ranges to be occupied throughout the adult life of WTE's and whilst nest sites may be used in different years, a given nest may be re-used for many years and even by subsequent generation of birds. During the breeding season adult pairs concentrate their activities on a nesting territory, which is a core portion of the year round home -range". I have observed this behaviour in regard to other eagle types such as Osprey and Sea Eagles.

In regard to avoidance the report states "It would seem likely that avoidance by a species with the flight characteristics of the Tasmanian WTE would generally be in the range of 95% to 100%". These flight characteristics are similar for other WTE and large raptors. "Data from overseas, based on findings of bird carcasses, demonstrates that large raptors do collide with turbines."

In addition to this we have the potential collision with other infrastructure plus the increased reduction in habitat/vegetation so the proposal to increase the wind farm will have an impact on the local bird life and the WTE population.

I note that the CWF obtained a report titled "Coppabella Wind Farm Proposed turbine Modification Impacts on Birds and Bats" to support its application.

It is interesting to note:

In 2.3 of the introduction on page 6 "there have been no previous formal bird utilisation surveys (BUS) at CWF collecting data on flight heights of recorded birds".

The report relies on inferred data from other sites the basis seems to be reviews of previous studies and infer results from those. The superb Parrot has data from 2016 however in regard to other species the data relies on 2008-2009 data (refer 3.1.1, 3.1.2)

The report states that WTE's have collided with turbines at other wind farms in New South Wales and elsewhere in Australia. Refer WTE Page 12.

The report in this paragraph states that three pairs of WTE were recorded at CWF which must have been in 2008 to 2009 as no surveys are quoted for a latter date. Since 5 WTE were observed during the visit to CWF, it is likely that the breeding population has expanded considerably.

**The report does not use the processes outlined in the Biosis Report, uses out of date data and infers from previous studies. It cannot be relied upon in determining the impact on "Birds and Bats" in regard to the CWF as it purports to do.**

In Elesá's letter under the heading "Impact on Bio-diversity not acceptable" we refer to the bird sanctuary on Garryowen as well as the planting of tree corridors to this sanctuary which is orientated toward the Coppabella Range. We are committed to preserving the local bird life and contributing to carbon absorption.

**In summary;**

The Fragile land cannot sustain the increased size proposed in the modification to the CWF put forward by Goldwind

No expert report has been commissioned to verify the increased proposals ability to be built and its impact on the fragile mountain during the build process and after when it is in operation.

The increase clearing of vegetation presents an unacceptable impact on the vegetation remaining on the Coppabella range.

The study assessing the impact on Birds and Bats is flawed and should not be relied on.

The WTE habitat is threatened and the possibility of collision/death has gone up.

Therefore:

**I encourage the Independent Planning commission to deny the modification application**

Yours sincerely

Philip Bennett

PhD, MBA ,B.Comm, FCPA

# YASS EARTH MOVERS

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To Whom It May Concern:  
Re, Yass Valley Wind Farm MOD 1

19-11-2018

The aerial photos taken clearly show the erosion that is taking place with NO infrastructure in place. To try and build on such steep erodible country is asking for an environmental disaster.

Land use, The Soil Conservation Service of NSW made a land use table purely to prevent the misuse of land to prevent any erosion or wrongly placed developments. This is a perfect example of why the table was made to prevent a large scale development like this causing non repairable damage to the land scape. It also clearly states the land over 18 dec slope should not be cleared and not be developed upon. Why than is this being considered ?

As you can see this has been cleared and is eroding, By putting the infrastructure needed to build the towers, roads etc this will be asking for trouble. You will be able to see it clearly from the Hume Hwy so all that travel the Hwy will be able to complain and make comment on WHY was this allowed to happen.

Once the roads are in place the water runoff will be likened to coming of a tin roof. 100% run off will cause a massive problem for any contractor on these slopes to mitigate any or all mitigations of soil sed control. It will not matter who implements the work or who polices the work and makes sure that everything is in place.  
**THIS WILL NOT WORK AND BE AN ENVIRONMENTAL DISASTER !**

For a project to be even considered in such a place as this is beyond me. We have more suitable places that would not cost as much to construct and also not cause such a cost on the environment, There are other power lines in NSW.

If you need to ask me anything I would be happy to talk or meet with whoever.

Regards

Andrew Field

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Example of the steepness of this terrain



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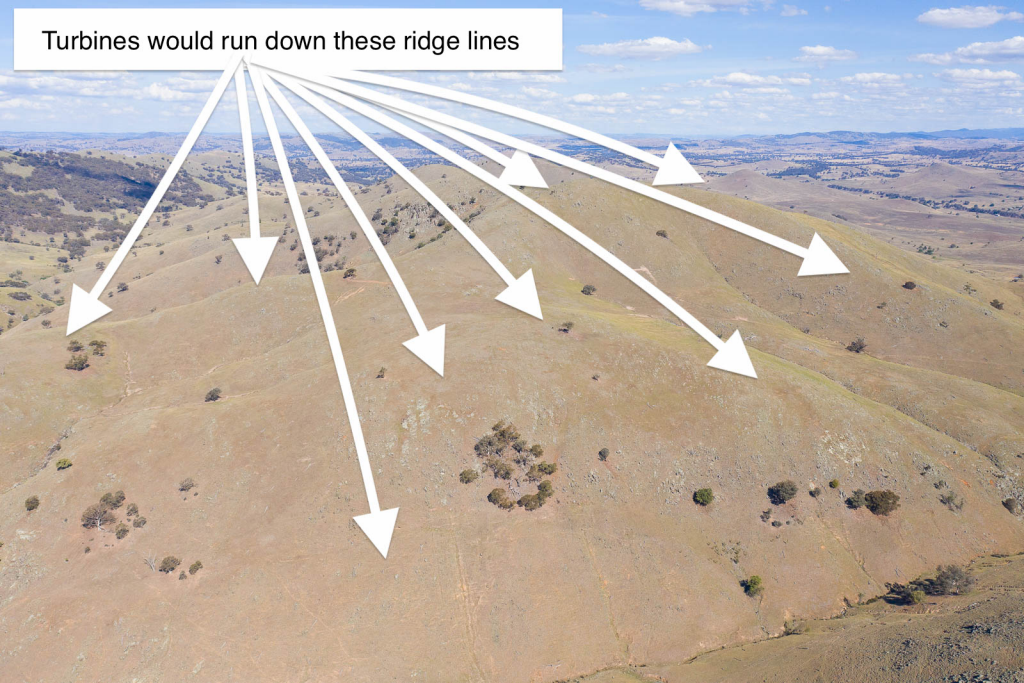


Example of the steepness of this terrain





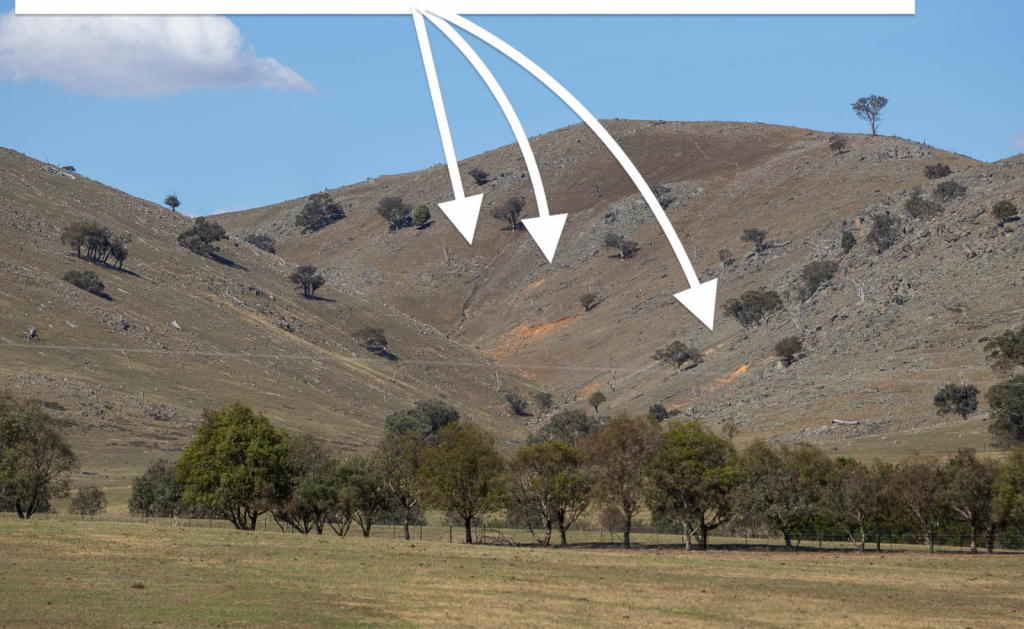
Turbines would run down these ridge lines



Steepness and existing scouring (turbines 41 to 44 in this location)



Example of the fragility of the land turbines will be sited above this erosion.

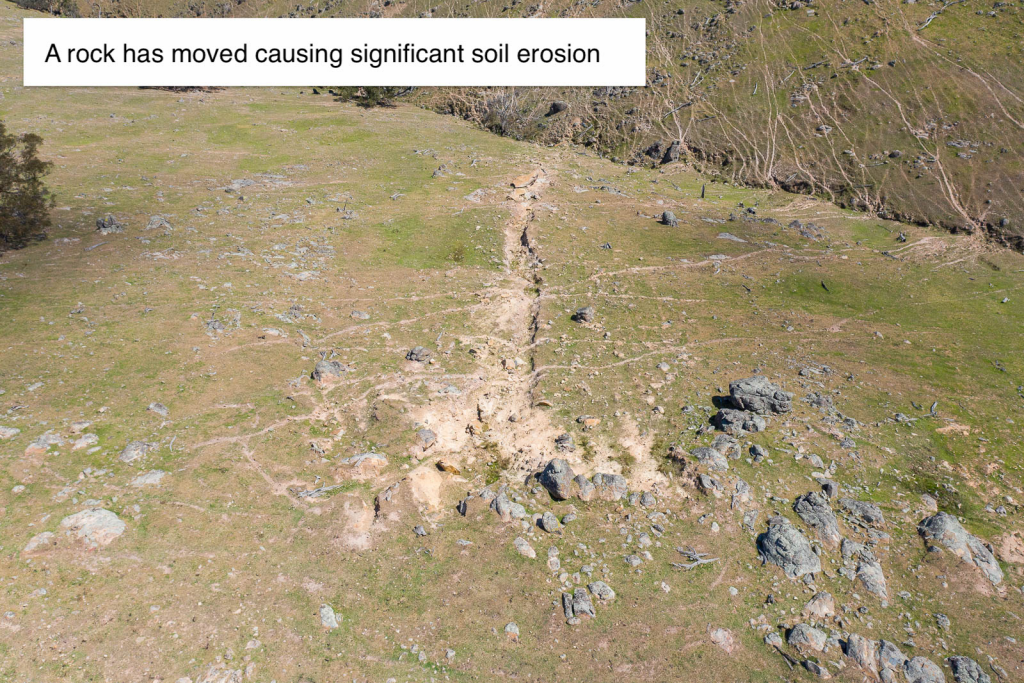




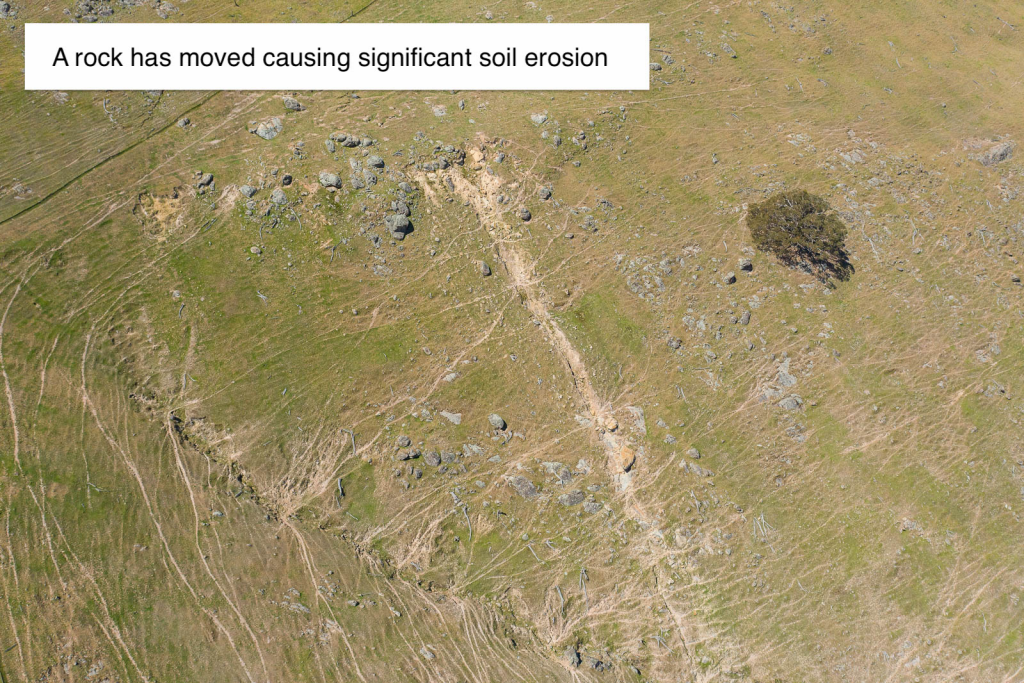
Example of the fragility of the land turbines will be sited above this erosion.



A rock has moved causing significant soil erosion



A rock has moved causing significant soil erosion





A rock has moved causing significant soil erosion



The road that the tour travelled on:  
Water runoff from this road has already caused serious erosion



The road that the tour travelled on:  
Water runoff from this road has already caused serious erosion





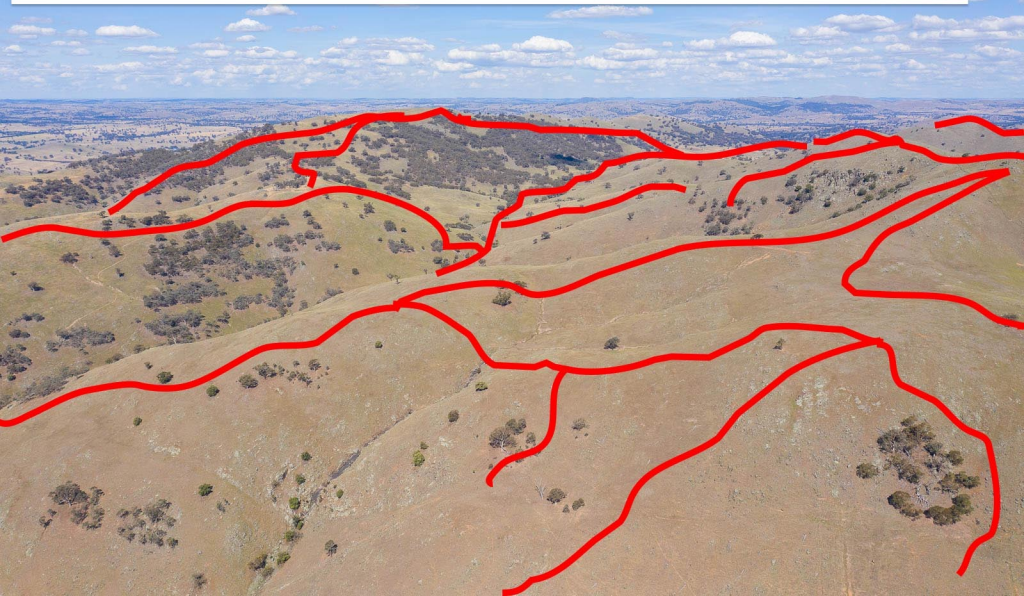
The hills of Copperbella are far steeper and tighter than those in the image supplied to us.

If even possible, building roads stable enough to support trucks carrying such large turbines will destroy this environment and cause irreversible erosion.

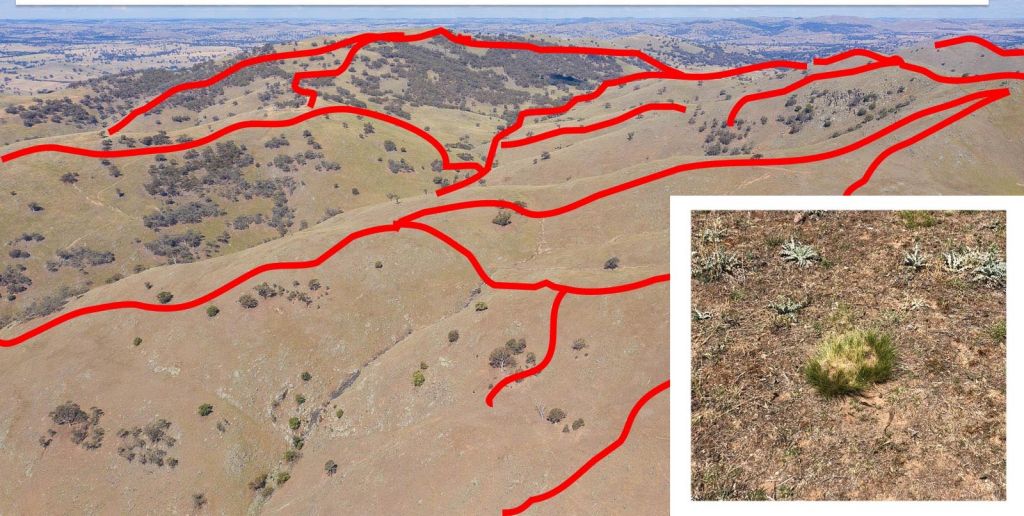




Example of network of roads that are proposed through this steep and challenging terrain.



The November visit also highlighted the need to control weed population, e.g. Tussock weed as seen and scotch thistles to name a few. The terrain will require aerial spraying due to its steepness however this will not be possible due to the height of the turbines





Trees and wildlife are immediately threatened in this area.

During the November visit, 5 Eagles were spotted who's homes would be destroyed





Proposed site for the concrete plant. Control of waste water will be difficult and the potential for waste water to flow down the hills side causing erosion is high. If this was to occur then the surrounding productive farm land would be polluted as well as surrounding streams.



View from this site showing potential run off areas.



Surrounding area that will be able to see the turbines

