

# **Submission to NSW Independent Planning Commission (IPC) re Valley of the Winds Wind Farm (SSD-10461)**

**This submission is made without prejudice.**

The following includes but not limited to critical areas of concern that have either not been addressed by the developer or DPHI, or where their response has been significantly inadequate.

## **Bushfire fighting**

The developer has only offered to put up a 50,000 litre water tank as Bush firefighting mitigation. This is clearly insignificant in terms of the vast amount of water required during a bushfire. Importantly, the developer has not offered firefighting infrastructure such as firefighting trucks and equipment, trained firefighting teams or any ability to be able to fight fires in the context of a widespread bushfire in the area.

How will this insignificant amount of water be deployed? The developer claims they have worked hard to minimise the footprint on critically endangered box gum woodland, this includes minimal access roads between turbines and the development site generally. This means that a large majority of the development area and outside the development boundary will remain difficult to access and be extremely dangerous to access during a bushfire event.

There are already many water tanks in the development area twice the size offered by ACEN, these are for stock and domestic water that have been installed by landowners over the long term. In the Sir Ivan fire these were of little use as access across the area where the fire front ran was either inaccessible by land vehicle or was too dangerous to attempt. The clear and urgent advice of the RFC fire controllers was to leave the entire area and do not attempt to fight the fire using land-based strategies. All of us involved in fighting the fire were ordered to leave and gather in declared safe areas. For example, my father was firefighting on our property 'Turee' and was threatened with arrest by the police unless he complied with these safety orders. The entire firefighting strategy relied on aerial firefighting by large aerial tankers and helicopters.

This critically important firefighting strategy will likely be lost due to the presence of hundreds of giant wind turbines as no aircraft will be prepared to fly anywhere near the development areas. This means that many surrounding non-associated landowners will no longer be protected by the only safe and effective strategy to combat bushfires, that is aerial firefighting.

Figures 1 and 2 show that measures recommended by DPHI are potentially life threatening as they do not address the core issue – that the presence of hundreds of

giant turbine blades will prevent safe access by aerial fire fighters regardless of the position of the blades, the turbines being turned off or lit.

**“The Department has recommended a condition requiring ACEN to detail operational procedures in the event of a bushfire in its Emergency Plan.**

**This would include measures such as shutting down turbines and positioning blades in a manner to minimise interference with aerial firefighting operations.”** (SSD-10461 pg 54)



*Figure 1-DPHI bushfire mitigation measure*



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**\*In Reality: Risk Assessment for aerial FIRE Fighting operators due to VOW development  
DO NOT fly anywhere near this area during smoke or low visibility.  
DO NOT use "Turee" or "Tongy" aerodromes when visibility affected by SMOKE  
in a BUSHFIRE event.**

*Figure 2 - Aerial firebombing will be too dangerous with turbines hidden by bushfire smoke*

### **Inadequate response by DPHI and NSW RFS**

DPHI have been potentially negligent in their response by claiming that the NSW RFS are in some way approving of this development.

The RFS has avoided directly commenting on the ACEN-VOW project, or any other industrial wind development, in terms of how aerial firefighting could be affected.

In their agency advice attached to the EIS for the VOW project (21<sup>st</sup> November 2023), the NSW RFS makes some comments that are clearly non-committal.

This includes their support for the recommendations of the Bush Fire Assessment Report prepared by Cool Burn Fire & Ecology (CBFE), dated February 2022. However, it is very important to note that the CBFE report does NOT in any way address the potential impacts on aerial firefighting due to the existence of giant wind turbines. The report instead focuses on the protection of internal development infrastructure - it does not discuss how the district and surrounding landowners and their property could be endangered by the VOW development.

The RFS also advises that blade rotation cease, and aviation lighting be operational if aerial fire fighting is occurring in the locality. This is a theoretical comment only. The RFS has NOT advised whether it would be safe for aircraft to carry out fire-bombing in the

future, given there will be hundreds of turbine blades hundreds of metres in the air throughout the development area, most likely obscured by smoke. The RFS has deliberately avoided clarifying this critical point by stating in paragraph 3:

*‘No additional comment was provide(d) with respect to the bushfire risk associated with the development.’*

DPHI and the IPC cannot therefore claim that this project is in anyway endorsed as being safe by the RFS of NSW.

## Visual Impacts

The DPHI has made the following claim in their assessment report:

*“The Department is satisfied that the project would not fundamentally change the broader landscape characteristics of the area”* (SSD-10461 pg. iii).

Figure 3 below represents the obvious erroneous claim by DPHI. Clearly, the VOW development will cause momentous adverse change to the broader landscape characteristics of the area.



Figure 3 - Erroneous claim by DPHI

## **DPHI claim discredited by EnergyCo**

The above claim as shown in Figure 3 is also fully discredited by EnergyCo in their Central-West Orana Renewable Energy Zone Transmission Project - Technical Paper 3: Landscape Character and Visual Impact (pg.5-34):

*‘Potential future landscape character: The approved Liverpool Range wind farm will strongly influence the character of the Cassilis to Coolah undulating rural hills landscape character zone (URH-5) in the future. It would be located on the hilltops and ridgelines extending north and northwest of Cassilis towards the Liverpool Range. Including new large-scale wind turbines, and supporting infrastructure such as inverters, battery storage facilities, substations, and facility buildings into the landscape.*

The Liverpool Range wind farm has 185 turbines approved at 215 m tip height. Given the clear and unambiguous statement by EnergyCo, an additional 131 turbines proposed by the VOW project that are even higher at 250 m can only inflict much larger adverse visual impacts on the Coolah district.

## **Biodiversity Impacts**

In their report SSD-10461, DPHI discusses their biodiversity assessment. There are many shortcomings in this process:

- 6.3.2 pt 72 claims a reduction in turbines from 175 to 148 – this is a false claim as these extra turbines were never accepted at any stage by relevant landowners.
- The claim of a reduction in project area from 1318 ha at EIS to 735 ha appears to be deceptive given only a marginal reduction in the project boundary. There has been instead an attempt to redefine the project area with *‘impact footprint’*.
- The impact on biodiversity will not be reduced significantly at all, given that 131 giant turbines will create a highly hostile environment for native fauna across the project area that will not be lessened by the developer re-defining the project area to the much narrower *‘impact footprint’*.
- The adverse effects from turbine noise including infrasound, blade strike, shadow flicker, wake turbulence, potential localised climate effects (including changes in rainfall patterns from downstream wake turbulence), night lighting etc. will all contribute to a hostile environment for native fauna regardless of micro siting of turbines
- There is no actual mitigation strategy, only a fatality monitoring process. For example, in Appendix 2 – Updated Mitigation Measures, section B1 describes the bird and bat adaptive management plan (BBAMP) *‘Mitigation Measures’* to include:

- carcass monitoring during the first 2 years of operation of the wind farm to estimate the number of birds and bats struck by turbine blades
- Scavenger assessment, to allow adjustment of carcass search data for carcasses removed prior to surveys
- Measuring ongoing impacts of the wind farm on bird and bat populations locally
- A strategy and notification protocol in the event the wind farm significantly impacts protected or threatened species
- As can be seen, there are no mitigation strategies as such; there will be no strategy or measures that can be taken to prevent bird and bat deaths. The only effective mitigation strategy is to not build the turbines.

DPHI have also made recommendations in SSD-10461 regarding the BBAMP. The discussion of their recommended adaptive management approach involves;

*‘stringent requirements for baseline monitoring, ongoing monitoring of any strike during operation, and triggers for adaptive management measure to avoid or minimise impacts.’ (6.3.5 – 94).*

Again, there is no clarity on what any of this actually means and only re-affirms the implied reality of the **carcass-count-and-carry-on** approach. The only effective mitigation to prevent aerial fauna fatalities (including those critically endangered) is to not build the turbines.

## Cumulative Impacts

The two mega projects proposed by ACEN and Tilt are unprecedented in scale and scope in terms of their potential significant effects on a town and district. There are no other towns anywhere that stand to be surrounded by hundreds of giant wind turbines - more than 300 are proposed for Coolah. Coolah therefore stands as a test case for multiple adverse impacts that can only interact and cascade with each other. These cumulative impacts have not been modelled or addressed in any meaningful way. Instead, the developers, DPHI and other proponents have carefully avoided any such assessment.

Cumulative impacts on the CWO REZ as a whole will have a significant impact on Coolah in addition to the mega wind projects planned for this district.

There will be large scale land devaluation for a large proportion of the CWO REZ citizens and property owners, and Coolah landowners will be hit hard in this regard. This is a major issue that is escalating by the day. Many landowners will be prevented from future subdivision, house building and development of their land because of the ACEN development, and other developments.

There will be adverse effects on already stretched health services, emergency services, poorly maintained roads and dramatic increased traffic on them, sound levels, visual amenity, mass increase in worker camp population without services to maintain them, and many other issues.

There should be no more project approvals, including the VOW project, until a comprehensive cumulative impact assessment is completed by DPHI for Coolah and the CWO REZ as a whole.