

## Coppabella (Formally Yass Valley) Industrial Wind Facility

### Background

**This project is like an aggressive malignant cancer that just keeps coming back.**

Origin Energy owned an early iteration of this project and lost interest in it.

It was then sold (or re-sold) to Epuron, a company that has never constructed an industrial wind turbine facility anywhere, but whose business model is to achieve Project Approval with the minimum number of constraints and sell the project to the highest bidder.

When Epuron took over this project from Origin Energy they did an appalling job of stakeholder consultation, many of the adjoining landowners were neither contacted and we believe this appalling lack of consultation was deliberate; as under major project legislation the proponent is required to consult, but not required to **diligently** consult.

In relation to my property their landowner database was so out of date they sent my notification letter to a deceased former owner.

However within 2 weeks following the closing of the public submissions Epuron managed to find me very easily; they simply called in at the house and I was here. It was then when Epuron first notified me of the Yass Valley Industrial Wind Turbine Facility.

**It should not be forgotten that following significant public and local landowner objection the NSW Department of Planning originally REJECTED the whole project.**

Unfortunately the PAC brought this thing back to life, and following a second approval attempt the NSW Department of Planning **REJECTED 2/3's of the original project**; this time the PAC ratified the Department's decision.

The track record of this project clearly demonstrates to me that this is an extremely "marginal" wind energy project, it was:

- Marginal in the eyes of Origin Energy;
- Marginal in the eyes of the NSW Department of Planning;
- So marginal in the eyes of Goldwind that they are seeking this extreme "modification";
- And it is certainly abhorrent in the eyes of the non-hosts of the Bookham and Bowning districts.

### Goldwind's Proposal for Modification

The Goldwind company (another foreign business looking to profit from Australia's generous RET subsidies), purchased the Yass Valley Industrial Wind Turbine Project from Epuron.

Goldwind has re-branded this Industrial Development as the "*Coppabella Wind Farm Pty Ltd*"; possibly in an attempt to distance itself from Epuron and its dealings.

Goldwind's modification proposal, is not what a normal person would consider a "modification", the reality is that it is a whole new project. Calling it a "modification" does not pass the "*Pub Test*" of common sense.

This proposal is for a Significantly Different Project and should be seen for what it is and REJECTED.

The Goldwind Proposal involves:

- A 184% increase in the destruction of a Commonwealth listed Critically Endangered Ecological Community;
- 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.
- The whole of the Conroy’s Gap Project (never constructed) was only 15 turbines.
- **How can the equivalent of 32 NEW WIND TURBINES be a modification? This is a whole new project disguised as a “Modification”.**

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		

Whilst the NSW Department of Planning has effectively “rubber stamped” all wind energy projects in the past; and even supported this industry on its website; it appears Goldwind is expecting “*Chinese*” planning standards to apply here. Surely even the NSW Department of Planning can’t accept this proposal as a modification!

### Public Interest Test

The Goldwind Proposal not only fails the “*pub test*” but it also fails the “**Public Interest Test**”; the “modification” is simply an ambit claim by a business to “back door” the equivalent of 32 additional turbines without going through a new project and full Environmental Impact Process.

It’s all about leveraging a “foot in the door”; to make a marginal project viable and to be able to gain the maximum level of federal government subsidy from each approved tower location.

Will this “*modification*” achieve a greater reliability in the NSW electricity grid? **NO**

Has Goldwind committed to provide a guaranteed dispatchable Base Level of generation to ensure NSW industry has access to a reliable power grid when wind energy is not effective? **NO**

Is Goldwind just another opportunistic foreign company looking to maximise its income from generous government subsidises while the “*goings is good*”; but just as likely to shut down all generation if storms threaten its infrastructure (as in South Australia) regardless of the impacts to the NSW grid and industry? **YES**

If Goldwind had the public interest at heart, the additional dollar spend would be better spent on a guaranteed source of dispatchable energy generation to underpin erratic wind generation.

### Critically Endangered EEC

The Goldwind Proposal involves the additional clearing of 117 ha of a Commonwealth Listed Critically Endangered Ecological Community, this represents a 184% increase in the destruction of this EEC.

**On this single issue alone this proposal must be rejected.**

There is no justifiable reason why the NSW Department of Planning could possibly allow the clearing of 181 hectares this threatened woodland.

This is not a “once off” situation. Every wind energy development in the Southern Tablelands of NSW has resulted in a like loss, and most significantly the adjoining Rye Park Industrial Wind Facility.

The cumulative loss of this Critically Endangered Ecological Community from all wind developments in NSW must be considered.

Unfortunately the NSW Department of Planning has been unable or unwilling to verify the nett cumulative loss of the Blakely's Red Gum Yellow Box EEC as a consequence of the Departments energy approvals.

This is the same EEC that attracts Federal Government funding and support for conservation and restoration projects through the Landcare movement and the NSW Local Land Services projects. Farmers are encouraged to preserve this critically endangered woodland. And yet the NSW Government is “rubber stamping” its destruction for each new wind turbine proposal or “modificaitons”.

**The biggest threat to the Critically Endangered Blakely's Red Gum Yellow Box Ecological Community is the wind energy industry and the NSW Department of Planning.**

### 36% increase in Blade Area (the Dead Bird Zone)

In the proponents sixteen page document on bird and bat impacts it makes the statement:

*“...the impacts of the proposed modified turbine design are not of conservation concern.”*

Setting aside the loss of a 180 hectares of Critically Endangered EEC with all its associated species, nesting hollows and migratory habitat. They base this conclusion on the premise that the blades have been raised 12 metres above the original proposed height and the birds will happily fly beneath the blades.

What this document fails to adequately address is the 36% increase in Blade Strike Area.

It belittles the impact on the raptor species. In respect to the Wedge Tailed Eagle it makes the claim that only 3 pairs inhabit the area, (which does not sound credible); and their destruction is of little consequence because the species is not considered threatened on mainland Australia.

It is my understanding that all Australian species are protected by law and that it is illegal to kill Wedge Tailed Eagles. If an Australian farmer shot a Wedge Tailed Eagle they would face prosecution; but the proponent suggests its “ok” for wind turbines to kill this species with no consequences (because they're not “threatened”!). Is this “Chinese” logic?

It also belittles the impact on the Little Eagle (listed as threatened). Whilst the document acknowledges an increased risk of bird strike for this species, it states because of the numbers are so low (being a threatened species) that the threat is minimal. What this document fails to

acknowledge is that the Bookham and Bowning area have an active population of Little Eagles which can be commonly observed along the Hume Highway.

### Superb Parrot

The report relies to 2 bird surveys. The most recent conducted during the month of September, it then goes on to discuss Superb Parrot sightings.

Superb Parrots are a migratory species, they only tend to move into the Yass area in late September, and are most commonly observed in the months of November to December. The official Bird Surveys for this species in the Canberra region are conducted in late October. Basing comments on this species on September surveys is both misleading and deceptive. A better snapshot of the presence of this species in the area could be sourced from the Atlas of Living Australia.

The original project poses a threat to this vulnerable species; the cumulative impact on this species and it's habitat of multiple wind developments across the Southern Tablelands is of real concern. The proposed modification is a recipe for extinction.

### Landscape Destruction

The additional height of 14%, additional blade area of 36% will have significant impacts on the landscape damage to the Bookham area.

The impact on the non-host adjoining landowners will be significant; this "modification" demonstrates that Goldwind has no real concern or compassion for the rural people of Bowning and Bookham districts.

This modification would significantly increase the landscape footprint of the original approved project.

Many Bookham residents were devastated by the decision to approve the Coppabella section of the Yass Valley Industrial Wind Turbine project (after the whole project was previously denied) by the NSW Department of Planning and the Planning Assessment Commission. These residents, like myself were not informed by Epuron of the scope and scale of this Project prior to the closure of public submissions. This proposal for Modification is another "kick in the guts" for these good people and they have now lost all faith in the equity of the NSW Department of Planning and its processes.

Wind turbines of this scale would not be tolerated in the Sydney metropolitan area; (actually there are no wind turbines of this type in the Sydney metropolitan area) and yet it's fine to put them in a pristine rural environment so long as it's 300 kilometres from Sydney!

This project is clear evidence of the failure of the NSW Department of planning. They have failed to implement Industrial Zoning for Wind Turbine Industrial Infrastructure in NSW. They have failed to introduce wind energy legislation and regulation in regards to decommissioning, road construction and environmental protection. As a consequence of these failures these projects are popping up like mushrooms regardless of the impact on both rural people and critically threatened EEC's. Had appropriate industrial zoning been applied the Southern Tablelands would not have been subject to opportunistic exploitation simply because the national energy connector runs right through it. The Department has aligned itself with the wind energy industry as demonstrated by a history of support for this industry on its website; and yet it purports to be the "independent umpire" in these matters. The Department has rubber stamped all past wind proposals (the one exception being the Yass Valley) on the basis of policy regardless of a proper planning process and the rights of affected rural citizens.

The State Significant Project legislation is like a bad joke; its dollar benchmark fails to address the lack of regional and NSW investment (as opposed to the overwhelming off-shore spend on wind turbines and equipment), it fails to mandate minimal standard of sustained regional employment, it fails to apply due diligence in the consultation of adjoining landowners and it fails to allow any regional approval and governance.

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