Submission Objecting to Modification 2 (Inclusion of Battery Energy Storage System) for Coppabella Wind Farm (SSD 6698)

Date: December 09, 2025

To: Department of Planning, Housing and Infrastructure Via the NSW Planning Portal

Re: Objection to Modification Application No. 2 for Coppabella Wind Farm (SSD 6698) – Inclusion of Battery Energy Storage System (BESS)

Dear Sir/Madam,

I am writing to strongly object to the proposed Modification 2 (Mod 2) for the Coppabella Wind Farm (CWF), which seeks to add a distributed Battery Energy Storage System (BESS) at up to 71% of the approved turbine sites (potentially up to 53 sites, each with six 40-foot containers, totalling approximately 1,050 MWh of lithium-based storage). My property is located approximately 7 km from the project area, placing it within potential impact zones for visual amenity, noise, and – most critically – bushfire smoke, toxic plumes, and emergency response disruptions. As a resident in this bushfire-prone region, I am deeply concerned about the unassessed risks this modification introduces.

This submission draws on the Yass Valley Council's Renewable Energy Development Projects Policy (adopted 2023), the expert submission by retired NSW Rural Fire Service (RFS) Group Captain Michael Gray (Attachment A to the Yass Valley Council Ordinary Meeting, 25 September 2025), and the Australian Fire and Emergency Services Authorities Council (AFAC) guidelines on Wind Farms and Bush Fire Operations (2018). These sources highlight significant gaps in the Mod 2 Environmental Assessment Report (EAR) and underscore why this proposal should be refused.

Alignment with Yass Valley Council Policy

The Yass Valley Council's policy explicitly opposes further large-scale wind turbine sites in the Local Government Area (LGA), stating that the area has "reached the maximum number of industrial turbines" due to cumulative social, environmental, and economic impacts from the four already approved wind farms. While Mod 2 is framed as a minor enhancement to an existing approval, the addition of over 300 lithium battery containers across the site represents a substantial escalation in industrial infrastructure. This introduces new hazards not contemplated in the original 2016 approval or Mod 1 (2018), effectively transforming the project from a wind generation facility into a hybrid generation-and-storage complex with chemical storage risks akin to a distributed hazardous goods facility.

The policy requires that renewable projects address:

- Bushfire risks and impediments to firefighting operations (including Rural Fire Service concerns).
- Impacts on the rural landscape, tourism values, and heritage.
- Adverse effects on the amenity of dwellings (e.g., visual and noise impacts).
- Economic and social impacts on local communities, including a mandatory sharing benefits scheme and Community Enhancement Fund.

The EAR fails to adequately demonstrate compliance. For instance, it claims "no significant increase in environmental impacts" (p. 5), yet introduces entirely new fire and contamination risks from BESS without updating biodiversity, heritage, or full community consultation assessments. The policy also mandates that infrastructure not be within view lines of villages, towns, or rural dwellings – the EAR's visual assessment (p. 55) is superficial, relying on a single photo from another site, and ignores the cumulative visual blight of white shipping containers clustered at turbine bases, visible from distances up to 10 km, including my property. Photomontages from

multiple viewpoints within 10 km should be required.

Furthermore, the policy insists on road upgrades to Council's standards prior to works and project commencement within 5 years of consent. The EAR's traffic assessment does not address the additional heavy vehicle movements for BESS transport from Port Kembla or future battery replacements (LFP batteries degrade in 10-15 years, necessitating at least one full replacement over the 30-year consent life, with hundreds of extra truck trips and toxic waste disposal). This "salami slicing" of impacts – assessing only initial installation – contravenes the policy's holistic approach to cumulative effects.

Bushfire Risks and Impediments to Fire Suppression

The CWF site lies in a historically bushfire-prone area with a cycle of major fires every 2.5 years (Harris Environmental Consulting, cited in Gray submission, p. 1). As detailed in Michael Gray's submission (a retired RFS volunteer with 37 years' experience, including command roles in the 2003 Canberra fires and 2013 Cobbler Road fire), the region west of Yass – including Bookham, Bowning, Burrinjuck, Wee Jasper, and Yass – has seen devastating fires in 1939 (28,892 ha), 1952, 1972 (19,489 ha), 1985, 2003, 2006, 2013 (14,000 ha), and 2023 (2,228 ha). These fires often originate from the west/northwest, driven by prevailing winds, and rely heavily on aerial suppression to slow fast-moving fronts (up to 5-6 km/h) in undulating granite terrain with mixed grassland and eucalypt forest.

Gray emphasises that clustered wind turbines create "No-Go Zones" for fixed-wing firebombers (e.g., AT802s) during high Fire Behaviour Index (FBI) days (40+ or Total Fire Bans), due to reduced visibility, vortex turbulence downwind of turbines, and risks from blades, even if stopped and rotated (p. 3). Helicopters may be grounded in high winds (60-80 km/h, as in 2013), and unmarked meteorological masts or power lines pose collision hazards. The approved CWF (75 turbines) already exacerbates these issues; adding BESS at up to 53 sites multiplies risks by creating 53 separate potential ignition points for thermal runaway events – a key hazard in lithium batteries, leading to intense, self-sustaining fires that release toxic fumes (e.g., hydrogen fluoride gas) capable of traveling many kilometres downwind. My property, 7 km away, is within a credible plume footprint, posing health risks to residents and livestock.

The EAR's Preliminary Hazard Analysis (PHA) is only qualitative (Level 1, p. 40) and assumes no fire propagation between containers despite minimal 3 m spacing (p. 49). Real-world incidents (e.g., 2021 Victorian Big Battery fire, 2023 Bouldercombe QLD, multiple 2024-2025 US/international LFP fires) show propagation at greater distances, requiring exclusion zones of 400 m+ (as in the 2024 Clements Gap turbine fire, Gray p. 3-4). The EAR ignores off-site air quality/contamination and demands the UL9540A test report be public (currently hidden under "confidentiality"). Local RFS brigades, largely volunteer-based, lack training/equipment for multiple simultaneous BESS fires across rugged terrain. Consultation was limited to emails with FRNSW and RFS (p. 31), with no evidence of sign-off on response capabilities.

The AFAC guidelines (2018) recommend shutting down turbines, positioning blades in 'Y' or 'rabbit ear' formation, and marking structures for aerial safety – but they predate widespread BESS adoption and contain no guidance on batteries. This outdated framework (quote: "Turbine towers... and power transmission infrastructure pose risks for aerial firefighting operations... exacerbated due to smoke") does not address BESS-specific hazards like electrocution risks from energised systems during fires or the need for specialised suppression (water and electricity don't mix, as noted for solar farms in Gray p. 3). Distributed BESS could force larger exclusion zones, further impeding aerial attacks critical for containing fires before they threaten Yass, Binalong, or Canberra.

Not "Substantially the Same" Development

Under Section 4.55(2) of the EP&A Act, modifications must result in "substantially the same"

development. The EAR claims the project "remains essentially the same" (p. 3), but adding 1,050 MWh of BESS changes its nature, introducing Class 1 dangerous goods (lithium batteries) across 53 locations. This escalates environmental risks without new studies on biodiversity/heritage (deemed unnecessary, p. 4), despite potential for fire-induced contamination. Refuse the mod and require a new State Significant Development application with a full Environmental Impact Statement.

Community and Other Impacts

Consultation was inadequate – only one landowner meeting and two Community Consultative Committee sessions (p. 31), ignoring "community perception" concerns (Table 5-2, p. 32). As Gray notes (p. 3), renewables' divisive nature strains rural communities and RFS memberships. Noise assessments claim no increase, but BESS inverters and cooling systems could add low-frequency hum audible at distances. The policy's required Community Enhancement Fund is not detailed in the EAR.

Conclusion and Recommendations

For the reasons outlined – misalignment with Council policy, heightened bushfire risks impeding suppression (especially aerial), inadequate hazard assessments, and failure to remain "substantially the same" – I urge the refusal of Mod 2. At minimum, defer approval until:

- A full quantitative risk assessment (PHA Level 3) is conducted.
- UL9540A reports and battery replacement/decommissioning plans (with financial assurance) are public.
- Container spacing is increased to 10 m, with binding emergency response plans endorsed by RFS/FRNSW.
- Updated assessments for visual, noise, biodiversity, heritage, and community benefits.

This mod priorities optimisation for the National Electricity Market over local safety in a high-risk fire zone. I encourage neighbours to submit similar objections to highlight the volume of concern.

Yours sincerely,

Linn Armour

Resident, Yass Valley LGA