

## **Submission Objecting to Modification 2 for Coppabella Wind Farm (SSD 6698) – Adding Battery Storage**

**Date:** December 09, 2025

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

**Re:** Objection to Mod 2 for Coppabella Wind Farm (SSD 6698) – Adding a Battery Energy Storage System (BESS)

Dear Sir/Madam,

I'm writing to strongly object to this proposed change to the Coppabella Wind Farm, where they're wanting to add a bunch of battery storage units at most of the turbines – up to 53 sites, each with six big containers, adding up to about 1,050 MWh of lithium batteries. My property is about 7 km away, so I'm worried about how this could affect things like the view from my place, extra noise, and especially bushfire risks, with smoke or toxic stuff drifting over. Living in such a fire-prone area, this really concerns me.

I've based this on the Yass Valley Council's policy on renewable energy projects (from 2023), that detailed submission from Michael Gray, the retired RFS Group Captain (which was Attachment A to the council meeting on 25 September 2025), and the AFAC guidelines on wind farms and bushfires from 2018. These show some big holes in the environmental report for this mod, and why it should be knocked back.

### **How It Fits with Yass Valley Council Policy**

The council's policy is clear – they don't want more big wind turbine setups in our area because we've already got four approved ones, and it's enough with all the social, environmental, and economic stuff piling up. Sure, this is just a tweak to an existing project, but chucking in over 300 lithium battery containers turns it into something much more industrial, like a spread-out chemical storage site. That's a big shift from the original 2016 approval, which was just about wind power.

The policy says these projects need to properly deal with bushfire risks and how they might get in the way of firefighting (including what the RFS thinks), plus impacts on our rural landscape, tourism, and heritage sites. It also covers things like how it affects people's homes, with views and noise, and the economic and social side, like sharing benefits with the community through funds or schemes.

The report doesn't really show they've met these. It says there won't be any big environmental changes (page 5), but they're adding a whole new set of fire and pollution risks without fresh looks at biodiversity, heritage, or talking properly to the community. The policy says no infrastructure in sight of towns, villages, or rural homes – but their visual check (page 55) is pretty basic, just one photo from somewhere else, and it ignores how these big white containers at the turbine bases would look from up to 10 km away, including from my property. They should have to provide proper photomontages from a few spots within 10 km.

Plus, the policy wants roads upgraded to council standards before work starts, and projects kicking off within 5 years of approval. The traffic part in the report doesn't cover the extra trucks for bringing in the batteries from Port Kembla, or what happens when they need replacing – these LFP batteries wear out in 10-15 years, so over 30 years, that's at least one full swap, with heaps more truck trips and dealing with toxic waste. It feels like they're breaking it into bits to avoid looking at the whole picture, which goes against the policy's call for considering everything together.

## **Bushfire Risks and Getting in the Way of Firefighting**

The wind farm site's in an area that's had major fires every 2.5 years or so (from Harris Environmental Consulting, in Gray's submission, page 1). Michael Gray's piece – with his 37 years in the RFS, including leading in the 2003 Canberra fires and the 2013 Cobbler Road one – talks about fires west of Yass hitting places like Bookham, Bowning, Burrinjuck, Wee Jasper, and Yass. Big ones in 1939 (nearly 29,000 ha), 1952, 1972 (over 19,000 ha), 1985, 2003, 2006, 2013 (14,000 ha), and 2023 (over 2,000 ha). These usually come from the west or northwest with strong winds, and they depend a lot on planes and choppers to slow them down fast (up to 5-6 km/h) in this rocky, hilly country with grass and trees.

Gray points out that clustered turbines create "no-go zones" for fixed-wing bombers like AT802s on high-fire days (FBI 40+ or total bans), because of poor visibility, turbulence from the turbines, and dangers from blades even if they're stopped (page 3). Helicopters might not fly in gusty winds like the 60-80 km/h in 2013, and things like unmarked masts or power lines are hazards. The existing 75 turbines already make it harder; adding batteries at 53 spots means 53 potential fire starters from thermal runaway – that's when lithium batteries catch fire and keep going, spitting out toxic fumes like hydrogen fluoride that can travel far. My place is 7 km away, right in the path if the wind's wrong, which could affect our health and animals.

The hazard analysis in the report is just basic qualitative stuff (Level 1, page 40) and assumes fires won't spread between containers even with only 3 m between them (page 49). But real fires, like the 2021 Victorian Big Battery, 2023 in Queensland, and others in 2024-2025, show they can jump further, needing big exclusion zones (400 m+, like in the 2024 Clements Gap fire Gray mentions, pages 3-4). They should make the UL9540A test reports public (hidden now for "confidentiality"). Our local RFS is mostly volunteers without the gear or training for multiple battery fires in rough terrain. They just emailed FRNSW and RFS (page 31), no real sign-off on handling it.

The AFAC guidelines (2018) say to shut down turbines, position blades safely, and mark things for air ops – but they're old and don't cover batteries. No advice on things like electrocution risks in fires or how water and electricity don't mix (like with solar farms, Gray page 3). Spreading out the batteries could mean bigger no-go areas, making it tougher to stop fires before they hit Yass, Binalong, or even Canberra.

## **Not Really the Same Project Anymore**

Under the EP&A Act Section 4.55(2), changes have to keep it "substantially the same." The report says it is (page 3), but adding 1,050 MWh of batteries makes it a different beast, with dangerous goods spread out. That's new risks without updates on biodiversity or heritage (they said not needed, page 4), even though fires could cause pollution. Better to refuse this and make them do a full new application with a proper EIS.

## **Community and Other Stuff**

They didn't talk to enough people – just one meeting with landowners and two with the committee (page 31), skipping over "community perception" worries (Table 5-2, page 32). Like Gray says (page 3), these projects divide communities and strain RFS volunteers. The noise report says no change, but battery inverters and fans might add a hum you can hear from afar. And the community fund from the policy isn't even mentioned.

## Wrapping Up

Because of how it doesn't line up with council policy, the extra fire risks messing with firefighting (especially from the air), weak hazard checks, and it not being the same project, please turn down Mod 2. If not, at least hold off until they do a full risk assessment (Level 3 PHA), release the UL9540A reports and plans for replacing/decommissioning batteries (with money set aside), space containers 10 m apart, get real emergency plans okayed by RFS/FRNSW, and update checks on views, noise, biodiversity, heritage, and community benefits.

This change seems more about making money in the electricity market than keeping us safe in a fire hotspot. I'd appreciate if you considered this, and I'm getting neighbours to send in their thoughts too.

Yours sincerely,

Orida Armour Lushmoor  
Resident, Yass Valley LGA