# Submission Objecting to 'Paling Yards Wind Farm': SSD-29064077

#### **FIRE**

- Wind turbines can catch fire.
- Wind turbines via lightning strikes and/or mechanical failures can be the source of fire ignition. (e.g. Goulburn NSW January 2023 & numerous more examples reported in the media over the years, including in Ohio USA last week, October 2023).



Fig 1. Wind Turbine Fire Goulburn January 2023

Link to Ohio wind turbine fire: https://www.bbc.co.uk/news/av/world-us-canada-67147288

- Wind turbines can suffer from "blade throw".
- The EIS Appendix J tells us that blade throw is "an incident in which a structural failure occurring in the blade of a wind turbine during operation results in parts of the blade detaching and being thrown into the surrounding area" and also reports an incident of a "blade fragment reaching an estimated distance of almost 1000m".
- A brief review of available news stories shows that fire and "blade throw" events often occur together (both resulting from failures of some sort and one often causing the other). This means that not only are wind turbines on occasions the source of fire ignition, but that they can then spread the resulting fire up to 1000m via thrown burning blade fragments.
- The EIS does not seem to mention this likely co-incidence of fire and "blade throw" or the fact that wind turbines have on many occasions been the source of fire ignition.
- The EIS is therefore fundamentally flawed.

Mitigation Strategy: Do not approve the "Paling Yards Wind Farm" and do not allow existing wind turbines to operate under total fire ban conditions.

#### PROJECT CONTEXT, OBJECTIVES & ETHICS

- The EIS claims that the project "will result in a reduction of greenhouse gas emissions of approximately 900,000 tonnes of CO2 equivalent annually". This claim forms the fundamental basis used to justify the project. The proponent therefore must fully and transparently justify this claim. This necessarily must not only involve an accounting of the energy produced by the wind turbine during its life, but also all of the embodied energy and carbon footprint from all aspects of the project. This, at a minimum, should include an accounting of the embodied energy /carbon footprint from all consultants & scoping works, construction materials, fabrication, transport, site works and construction, transmission and other associated infrastructure, maintenance and operation, and back up battery and/or gas plants. This has not been published in the EIS and therefore no rigorous justification for the project has been presented. On this basis the EIS is fundamentally flawed.
- I have written and spoken with a number of politicians regarding my concern that the current process for the mass rollout of renewable energy infrastructure in NSW is not ethical. The principle of environmental equity states that the harms and costs should be carried to the extent reasonably possible by those demanding and consuming the end product. This is not happening with the wind industry in NSW and regional areas are consequently the victim of disproportionate harms. The EIS makes no mention of the principle of environmental equity.
- Secret contracts with "non disclosure agreements" seem to be the norm in the wind industry. This allows cynical negotiating tactics that are often divisive in formerly harmonious communities. Furthermore, while some land owners may perceive that they have been generously compensated, compensation for other affected land owners may be inadequate or non existent.
- The wind industry is operating in a legislative and political environment that seems to me to be unfairly weighted in its favour. The proponent has spent years preparing, scoping the project and preparing the EIS, yet the Oberon community has only been given a few weeks to respond. Local planning has been removed via "State Significant Infrastructure Pathway" how is that democratic? The proponent has pictures on their website of politicians opening their projects. How can the fundamental purpose of government, to administer justice, be carried out if government seems to be favouring one party at the expense of another?

# **Mitigation Strategy:**

- The proponent must submit comprehensive, rigorous and transparent accounting of their greenhouse gas emission reduction claims.
- All non disclosure agreements should be removed from all contracts involving "Paling Yards Wind Farm". Contracts and correspondence between the proponent, government and authorities must be fully disclosed to the public.
- All landowners in the "visual catchment" of the wind industrial estate must be fairly compensated.
- Requirement for local planning approval by Oberon Council should be reinstated.
- Resubmit the EIS to concisely and clearly describe and quantify the multiple
  environmental and social harms that will likely result from this project. The thousands
  of pages of the current EIS and Appendices for the most part dismiss, justify or ignore
  obvious environmental and social harms and therefore make it completely inadequate.
- The proponent should cease using the term "farm" for the cluster of industrial structures they are proposing.

### **LANDSCAPE**

The Oberon District farmlands, forests, villages and world heritage national parks are, together, a unique and diverse area of outstanding natural beauty that is the bedrock of flourishing and growing tourism, arts and crafts, vibrant local commerce and a daily inspiration to all who live here and come to visit us. One 240m high industrial structure with flashing red lights on top would ruin that. 47 industrial structures would ruin it more. The 104 pages of the EIS Appendix G will not change that fact. Self serving sophistry and using terms like "Landscape Character Units" will not change that fact. Insulting past and present custodians by assigning a "Scenic Quality Rating" of "Moderate" or "Low/Moderate" to our rural landscapes will not change that fact. Taking away local planning using "State Significant Infrastructure Pathway" will not change that fact. The Oberon Plateau is our home, we love it and we don't want it ruined by wind towers.

Mitigation Strategy: Do not approve the "Paling Yards Wind Farm"

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