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CWO REZist opposes the industrial wind project "Bullawah".

Industrial wind turbines will never provide the baseload power that our country needs, therefore the "project need" is redundant. The proponent, German-headquartered developer BayWa r.e, is a multinational corporation - they are not proposing this project for the public good of the residents of NSW, they are proposing this project for PROFIT. To state under project need to meet the ill-informed government climate targets is disingenuous, meaningless and proves this section is a box ticking exercise that is used by every wind developer.

Wind turbines are not 'ecologically sustainable'. Consideration needs to be given to mining for metal and materials, manufacturing, shipping and transport, clearing of land, blasting, underground cabling, cement, high voltage transmission infrastructure, maintenance, decommissioning and recycling. If this is done honestly, it is apparent that industrial turbines are far from "sustainable".

The residents of the SW REZ were not properly consulted regarding being placed in a renewable energy zone which will result in their whole district being substantially changed from rural to industrial, as has been admitted by Energy Co in the CWO REZ.

Social licence is based heavily on minimal interactions and a flyer that was distributed to approximately 10% of residents in the wider district. We believe the proponent has not made sufficient efforts regarding consulting with the local community and DPHI should request the community be engaged with in more meaningful ways before this project be considered for approval.

The location of this project is adjacent to Oolambeyan National Park. Fauna does not respect boundaries and will likely result in high numbers of avian fauna deaths by blade strike. The cumulative effect from multiple wind projects in the district also must be considered. Offsets will not cure the destruction from this and the cumulative projects in the SW REZ.

Three building groups were identified by the proponent as Potential Heritage Items. Vibration from nearby vehicles and construction activities are likely to heavily negatively affect these structures. Turbines and/or access roads need to be moved at least 100m away for these historic remains to be preserved as part of the district's history.

The proponent has identified 29 potentially impacted Aboriginal sites and aims to address these purely through micro-siting, or a surface collection program prior to any ground clearance works. This is insufficient to protect our aboriginal heritage.

The lengthy construction period of 3 and half years will heavily impact residents and their daily lives will be confronted by this extended period of negative impacts from increased workers, increased traffic, OSOM trucks etc.

The proponent lists multiple projects nearby. DPE needs to consider the cumulative effects for the whole REZ including future (not approved) projects and the negative effects that will impact residents living amongst these power generators, many of whom have never agreed to having their landscape changed so drastically.

The proponent states the majority of raw water demand for the Project will be met on-site using extracted groundwater. No groundwater or aquifer access should be allowed as this will negatively affect the wider district's access to bore water. This should be a condition of consent if the project gains approval.

The proponent's aviation consultant, Aviation Projects, has recently implemented a reduced consideration in all wind projects they have been contracted for, for wake/turbulence from turbines to be only 10 rotor diameters. There is a lack of recent real-world studies in regard to wake and turbulence on aircraft from large turbines and the studies the proponent is basing their estimates on, are heavily weighted for wake/turbulence on other turbines only, not, for example, light aircraft. The published standard calculation in Australia is for 16 rotor diameters (see [https://www.infrastructure.gov.au/sites/default/files/documents/4.1.3 Guideline D Wind Turbines .pdf](https://www.infrastructure.gov.au/sites/default/files/documents/4.1.3_Guideline_D_Wind_Turbines.pdf) " Consideration also needs to be given to the 16 rotor diameters in the CIRCUIT area, not just the landing area. The proponent should not be able to unilaterally alter the standard. DPHI must request the proponent to recalculate turbulence and wake effects using the standard 16 rotor diameters.

The Aviation report appears to not consider VFR flight in stress of weather conditions when low flying is permitted below 500ft. In these cases, visibility is relaxed to 5km, aircraft must remain clear of cloud/smoke and in sight of ground or water (Ref: AIP ENR1.2). Further reduction in visibility is allowed to 1500m for fixed wing or 800m for helicopters, if below 140 knots airspeed. The off-white colour of the turbines will not contrast with rain, cloud or smoke especially in low-light conditions. Obstacle lighting and high-visibility markings would be of benefit in these conditions.

Only considering the fine weather situation ignores the poor weather case which is when most terrain collision accidents occur. Doing a risk assessment matrix then failing to include the worst-case is deceptive and negligent.

The proponent has stated "Most aerial firefighting organisations have formal risk management programs to assess the risks associated with their operations and implement applicable treatments to ensure an acceptable level of safety can be maintained." However, stating that routine aviation risk management strategies are used does not address the fundamental problem. Routine risk management will dictate that Large Air Tankers, and probably Small Air Tankers as well, stay clear of turbine areas when visibility is obscured by smoke. Aerial firefighting will be restricted in and adjacent to the project area. In smoke and with turbulence, air tankers will have to stay outside of, or well above turbine areas, thus making them ineffective.

With regard to decommissioning, merely removing above ground infrastructure is insufficient and will not return land to its pre-development condition. Saying "Underground cables are likely to remain in place, pending approval and compliance with consent conditions as their removal could result in unnecessary additional environmental and agricultural impacts." is inadequate, considering the environmental destruction that the proponent will be undertaking to build this project.

Decommissioning and rehabilitation need actual responsibility and guarantees undertaken by the proponent with FULL rehabilitation, including removing of underground infrastructure and undertaking the monetary responsibility for the cost of doing so. This should be a condition of consent if the project gains approval.

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10 August 2024