

Mike Young  
Executive Director  
Resource Assessments and Compliance  
Department of Planning and Environment

### **Crudine Ridge Wind Farm (Mod 1)**

Thank you for the opportunity to make a submission opposing the Crudine Ridge Wind Farm (Mod 1) to increase the limit for tree clearing along the access road, to align the proposal with the EPBC Act imposed limit of 37 turbines **AND to increase the blade length to 68.5m.**

This modification is all about increasing the blade length.

I note that the conditions of consent limit the turbine height to 160m but puts no limit on the blade length. And whilst the EIS documents do not give specific details, there is an implication that the blade length might be 40m or less and the estimates for roadside clearing put to Planning and the IPC is based on a blade of that size.

Yet another example of an EIS designed to deceive. Surely an actionable offence?

I have based my submission on a worst-case scenario to increase the blade length from 40m to 68.5m, that is a 193% increase in the swept area and which will bring the blades down to a height of 23m above ground. Given that the EPBC Act decision was a significant reduction in turbines because of concerns for threatened species including bat and bird strike and capped the number of turbines at 37, the impact of the increased blade length requires careful assessment.

I suggest that the environmental impacts of the increase in blade length on threatened species may be considerable. At the very least this MOD 1 proposal should be a controlled action assessed under the EPBC Act and assessed on its merits with application of the principle of prudent avoidance and the blade length restricted so as to avoid any further roadside clearing.

This proposal has no merit and should be refused.

Perhaps the Department should consider making a maximum blade length a condition of consent for future wind farms because of the flow-on environmental impacts particularly to bat and bird strike risk.

Brenda Gerrie  
Captains Flat, NSW  
18 December 2018

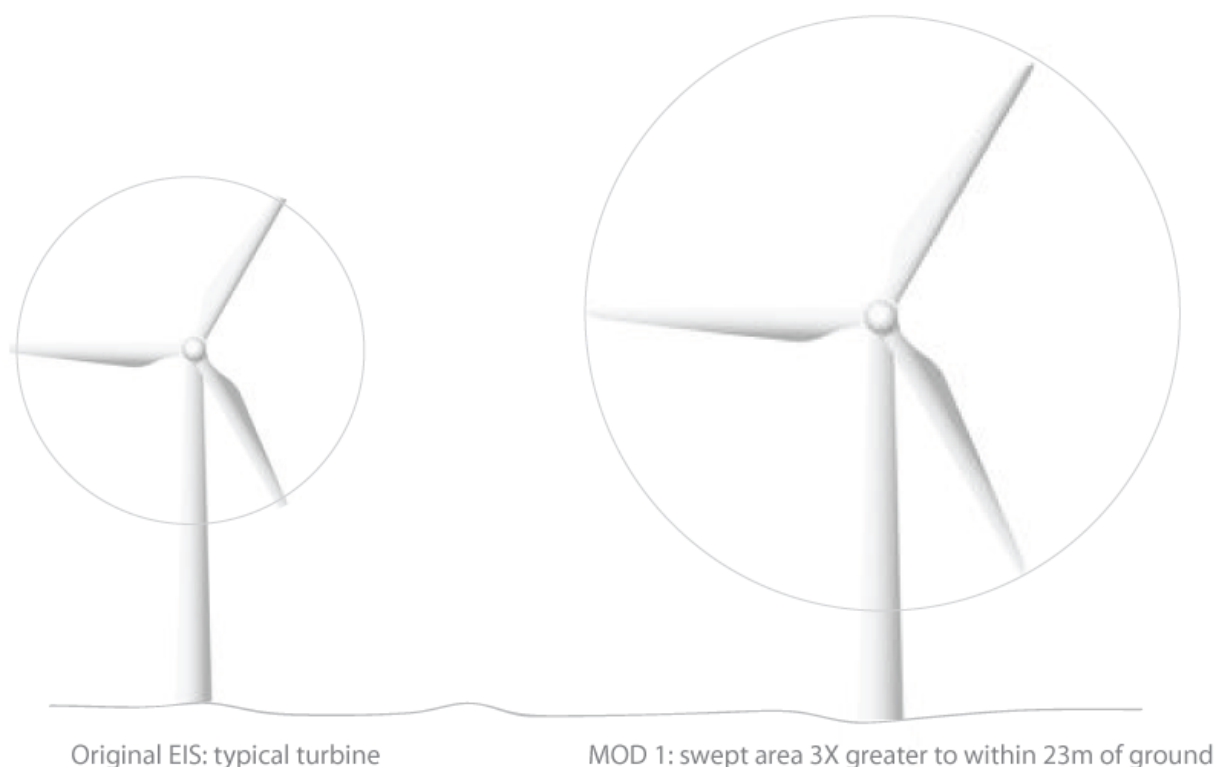
### [Attachments](#)

Attachment 1 Crudine Ridge (Mod 1) Impact Summary: showing differences between a swept area of 40m and 68.5m radius

Attachment 2 Submission Opposing the Crudine Ridge Wind Farm (Mod 1): in more detail

## Crudine Ridge Wind Farm (Mod 1)

### Impact Summary



Turbine height: 160m

Blade Length: 68.5m

Swept Area: 3 times greater than the typical turbine proposed in the original EIS and blade sweep to within 23m of the ground

### Environmental impacts

The increased blade length and swept area will **increase** most of the environmental impacts including:

- Land clearing for access and transport and, consequently there is an increased risk to threatened flora

- Bat and bird strike rates

- A wider range of bird species including raptors, woodland birds and parrots are at risk because the swept area is much closer to the ground and closer to hollow bearing trees

- Risks associated with shadow flicker, blade glint, blade throw and telecommunications

None of these increased environmental impacts have been addressed in the Mod 1 EIS.

**This proposal should be a controlled action assessment under the EPBC Act.**

**This modification must be rejected**

## Submission Opposing the Crudine Ridge Wind Farm (Mod 1)

Thank you for the opportunity to make a submission opposing the Crudine Ridge Wind Farm (Mod 1) to increase the limit for tree clearing along the access road, to align the proposal with the EPBC Act imposed limit of 37 turbines **AND to increase the blade length to 68.5m.**

### My Background

My name is Brenda Gerrie and I live on a rural property south of Canberra and I am familiar with the general area where the wind farm will be built.

### My Understanding

The NSW Government approved a version of this wind farm with a cap on the number of turbines, turbine height and a cap on land clearing. I note that no rotor diameter was mentioned in the original EIS, but it suggested typical tower heights of 80 or 101.5m and various blade lengths from 37m.

Subsequently, the EPBC Act approved a reduced number of turbines because the wind farm would have a significant environmental impact on threatened species including bat and bird strike.

Then the proponent was fined for unauthorised land clearing along the access road and required to submit a modification proposal (Mod 1) and an order to stop wind farm construction issued on 7 December 2018.

Mod 1 proposes a longer blade which requires roadside clearing along most of the access road including clearing of threatened species. And although the turbine height remains at 160m, the longer blade will increase the swept area by 193% compared to the swept area of a 40m blade and will bring blade tips much closer to the ground. None of this is easy to glean from the Mod 1 EIS document.

**In summary, this modification proposal seeks sanction for the land clearing which the proponent has already begun so as to transport a longer blade, and without adequate impact assessment of the increased blade length.**

### Key Considerations

There has already been compromises to reduce significant environmental impact under the EPBC Act. Additional impacts should neither be accepted nor approved.

The original EIS mentions smaller blade lengths and presented calculations for roadside clearing based on a smaller blade. Mod 1 proposes a blade length of 68.5m which means a tower height of 91.5m thus bringing the blade down to 23m above ground. The swept area will be  $\sim 15,000\text{m}^2$  as compared to a swept area of  $5,000\text{m}^2$ . In other words, Mod 1 will increase the swept area 193% and will bring the blades nearly twice as close to the ground as the typical blade mentioned in the EIS.

None of the environmental impacts of the increased blade length have been addressed in the Mod 1 EIS.

Nor has the proponent made it clear whether the additional roadside clearing for MOD 1 factors in the illegal clearing which has already been done.

**The environmental impacts of the increase in blade length on threatened species may be considerable. At the very least this MOD 1 proposal should be a controlled action assessment under the EPBC Act and assessed on its merits with the application of the prudent avoidance principle.**

**This proposal has no merit and should be refused.**

## Objections

I object to Crudine Ridge Wind (Mod 1) for the following reasons:

- The approved wind farm is in an area where there has already been a compromise to reduce significant environmental impact. Additional impacts should be neither accepted nor approved.
- Additional roadside land clearing including destruction of threatened flora simply to accommodate an increase in blade length is unacceptable. Prudent avoidance dictates that the blade length be restricted to avoid further roadside clearing.
- The three-fold increase in the swept area will have a significant impact on bat and bird strike, including threatened species and increase the bird migration barrier. Additional impacts should be neither accepted nor approved.
- Lowering the swept area to within 23m of the ground will have a significant impact on a wider range of bird species including woodland birds and parrots which fly closer to the ground. Additional impacts to threatened species should be neither accepted nor approved.
- The increased blade length puts the swept area closer to hollow bearing trees. Additional impacts should be neither accepted nor approved.
- I question the claim in Mod 1 that the increase blade length will have no impact on visual or noise. Independent peer review should assess these claims.
- The increased blade length may also increase the risks associated with shadow flicker, blade glint, blade throw and telecommunications, none of which has been mentioned in the Mod 1 EIS.
- None of the environmental impacts of the increased blade length have been addressed in the Mod 1 EIS. This proposal should be refused and a maximum blade length to avoid further clearing should be a condition of consent of the original proposal.

I also object to the sleight-of-hand way in which the proponent has used their original unrealistic proposal as the baseline for comparing impacts, particularly land clearing. The baseline for comparison should be the 37 turbines and associated land clearing approved under the EPBC Act. The extent of the land clearing in the Mod 1 EIS is over that limit. Additional land clearing should be neither accepted nor approved.

Nor has the proponent made it clear whether the calculation for additional roadside clearing for MOD 1 factors in the illegal clearing which has already been done.

Brenda Gerrie  
18 December 2018