

John McGrath
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20TH October 2017

To whom it may concern

I wish to submit an objection against modification and future construction of the Coppabella Wind Farm AKA the Yass Wind Farm Application, State Significant Development Application Number SSD 6698 Mod 1 for the following reason;

Extra impact on flying lifeforms via application for the extension to blade length of 10 meters and applied for extension in blade tip height to 171 meters.

If the DPE approves these adjustments to blade tip height and blade length extensions, there will be a massive increase in both direct strikes on avian and mammalian flying species.

The added height will impact a massively larger sphere of flying animals, and with an added 10 meters from a presently approved 60 metre blades to a applied for blade length of 70 meters, as above this also extends the radial impact zone for any animal.

Given that 10 meters doesn't sound like a large increase in blade length, it's when viewed against a standard house a long way for example.

If the extension to both height and blade lengths for the Coppabella Wind Farm are approved and if 79 towers are approved then this will become one massive killing field.

The extra 10 meters on the blade length means that the **tip speed increases** exponentially, thus making unavoidable collisions from flying creatures a fact of life.

Denial of bat and bird deaths whether via barotrauma or direct impacts from fast moving blades is not applicable.

The proponents in this case Goldwind self-admitted to killing more than 10 Wedged Tailed Eagles at their Gullen Range Wind Farm in their first year of operation, **for which they were not prosecuted for killing these birds yet its illegal for anyone to kill, trap or poison this species in NSW.** Goldwind for their "misdemeanour" in this case contributed only a figure of \$1500-00 to WIRES for each Wedged Tailed Eagle that they admitted to killing. No accounts of the maimed members of this species alone that move away severely injured to die a slow painful death.

Barotrauma, which is the change in air pressure either causing collapsed lungs or loss of controlled flight also take its toll on flying creatures near these fast spinning blades.

Therefore, I respectfully ask the DPE to consider the implications on wildlife of approving the increase in tip height of 14% and extension of blade length by 36% for the machines of Coppabella Wind Farm?

Regards

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Lack of transparency of proponent on fire lighting capabilities of wind turbines.

When at the Coppabella Wind Farm Community Consultation Committee Meeting on the 5th October 2017, I had asked Goldwinds "Development Manager" Tom Nielson what potential have the yet untested GW140-3.4 MW turbines for igniting fires, he repeatedly made the point that because these turbines do not have gearbox then there is no ignition source, and that starting fire was nonexistence.

Fire igniting issues that the proponent's representative Tom Nielson failed to address for "gearbox less turbines" igniting fire where;

1. Lightning strikes- whilst as an experienced licenced electrician with experience in many fields of the electrical industry including high voltage, I understand that these devices will be earthed to an underground earth mat, but given the extra height applied for now of a 171-meter blade tip at the Coppabella Wind Farm the incidence of lightning strike is grossly exaggerated. Also given that these devices are earthed does not preclude lightning utilising the support tube of the tower to bypass the earthing of the tower resulting in the lightning striking the ground and travelling through the soil below thus igniting the surrounding area with a sheet of excessively high voltage- for instance lightning strikes splintering mature trees which are obviously not of the magnitude of the proposed Coppabella Wind Towers, in so doing igniting their roots underground. Humans and animals such as livestock have been both injured or killed by lightning strikes, it does happen.

The NSW Southern Tablelands and South West Slopes are known for their lightning ignited fires.

2. Disintegrated bearings will start fires?
3. 17th January 2017 Currandooley Fire (Capital Wind Farm) ***supposedly*** started by an electrocuted crow falling - whilst technically not a turbine induced fire that incident has been proven to have started a fire within the "footprint" of a Wind Farm, that fire destroyed more than 4000 Ha livestock, buildings, vehicles and machinery.
4. Internally ignited fires in the oil filled Narelle/generator housing, caused by electrical fault.

5. Has Goldwind or their expected subsequent Coppabella Wind Farm owners addressed the training of city based Wind Farm maintenance workers to
 - a. Understand the full implications of the Rural Fire Services meaning for Total Fire Ban Days?
 - b. Understand the implication of the Fire danger warnings?

Who will be responsible for these fires given that there inevitably will be fires started within the footprint of this Wind Farm should it go ahead?

Given there's now sufficient evidence to show that both fixed winged and or rotor bladed firefighting aircraft effectiveness will be severely hindered by the proximity to nearby Wind Farms. Decreasing their ability to suppress grass and or bushland fires.

Given that, recently in consulting with a trained city based fire brigade colleague who informs me that its now standard practice for emergency personnel such as himself to be required to be 1 ½ times the height of a tall building fire then here is no way to address the fire that starts in the foot print of a wind farm until it has spread to a very large area. Very large footprint of burnt uncontrollable country.

So, in summing up can the DPE approve the extension in height to the towers at the Coppabella Wind Farm when the increased fire risk must be considered?

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I wish to submit an objection against modification and future construction of the Coppabella Wind Farm AKA the Yass Wind Farm Application, State Significant Development Application Number SSD 6698 Mod 1 for the following reason;

Inadequate, ineffective and unsuitable request for decommissioning protocols,
"Modification Application Environmental Assessment Report
Coppabella Wind Farm (Formerly Yass Valley) Wind Farm SSD-6698
Prepared by NGH Environmental"

On page 21 of the listed documentation this small notation is made on decommissioning the Coppabella Wind Farm;

"Decommissioning

In addition to the requirements already contained in the Development Consent, CWFPL proposes to proactively commit to the preparation of an appropriate Decommissioning and Rehabilitation Plan within 5 years of the project becoming operational"

I fail to see, how this information supplied by the proponents representative, NGH Environmental and is part of the Goldwind on exhibition folder' was ever allowed to be placed there for public exhibition?

Surely for 2 reasons, this State Significant Development Application Number SSD 6698 Mod 1, cannot be approved under these demands by Goldwind?

1. As Goldwind already have a recorded track record for on selling their Wind Farm Projects in a very short time frame, (Gullen Range at Crookwell as an example) it then appears that Goldwind **acknowledge their intentions not to honour the above decommissioning statement by their omission, of having planned decommissioning practices/protocols in place prior to commencement of "development" of Coppabella Wind Farm.**

2. Given at present there is no Wind Farm Decommissioning Legislation in NSW which protects the rights of both affected non-involved land holders as well as Wind Farm hosts regarding- **“REAL DECOMMISSIONING SURETY OF THIS WIND FARM EVER BEING DECOMMISSIONED?”**

Therefore I implore this Coppabella Wind Farm AKA the Yass Wind Farm Application, State Significant Development Application Number SSD 6698 Mod 1 not be approved until the proponent Goldwind has committed to an ongoing binding document, that is transferrable from one wind farm owner to the next that includes a sum independently secured in advance that has to be both financially binding and indexed accordingly and requires them irrevocably to decommission the Coppabella Wind Farm completely safely and in an environmentally responsible way.

Decommissioning must be addressed properly before this modification can be approved.

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I wish to submit an objection against modification and future construction of the Coppabella Wind Farm AKA the Yass Wind Farm Application, State Significant Development Application Number SSD 6698 Mod 1 for the following reason;

Multiple discrepancies in the proponent's Goldwinds assessment of noise levels.

From the predicted use of the Goldwind GW140-3.4MW being **based totally on assumptions and predictions.**

The acoustic company employed by Goldwind MARSHALL DAY Acoustics state;

"Noise emission data for the Goldwind GW140-3.4MW is presently unavailable."

- 1) I query how any predicted noise assessments can be done on a generator that has no available data to that effect? See highlighted in yellow below in the words of MARSHALL DAY Acoustics.

Yet on page 10 3.3 **Applicable Noise Limits** paragraph 5 of Rp 001 R0120169260 Coppabella Wind Farm Modification Application-Noise Assessment, it states

"At this stage in the assessment of the proposed modification of Coppabella Wind Farm, the original background noise data and the Development Consent limits has not been reanalysed"

My question here is then why not at this stage of the "proposed modification of Coppabella Wind Farm, the original background noise data and the Development Consent limits has not been reanalysed?"

- 2) Rp 001 R0120169260 Coppabella Wind Farm Modification Application-Noise Assessment Page 15.

Special Noise Characteristics

5.2.1 Tonality

s

The term tonality generally applies to music but obviously via certain harmonics produced by a generator, its "drive chain" given that this turbine is alleged to be magnetically driven then there's still the atmospheric interference of the blades at whatever "feathered" position that they sit in will produce these harmonics.

Given that these machines must have bearings then there will be bearing noise. Then that the turbine produces the above harmonics, there will be induced harmonics through the support structure. Thus; Again I ask how can data be calculated for an unproven generator such as the GW 140-3.4MW machine?

Page 13 Ground Conditions also an assumption using UK Data of little relevance to the proven age differences and composition in Australian Soil types with our continents soil types being many millions of years older than those of Europe. Considering Goldwind have only pushed in access tracks in recent weeks and with the acoustic documentation prepared well before any soil testing has taken place (more than likely even at this stage that soil testing has not taken place) on the Coppabella Range then Ground Factor data presented by Goldwinds acoustic firm MARSHALL DAY Acoustics ground conditions is well irrelevant to an approval by NSW State Department and Environment being made on the Coppabella Wind Farm AKA the Yass Wind Farm. The predicted atmospheric data from the UK Page 13 Rp 001 R0120169260 Coppabella Wind Farm Modification Application-Noise Assessment, **then also becomes irrelevant when applied to local conditions.**

How can approval be given to the proposed modification of Coppabella Wind Farm?

When so much of the noise data submitted is unknown, including all the unknown noise outputs of an untested generator mixed with untested height and blade lengths, in an untested geographic location with basically no "local" atmospheric data available with no known data. Then I refer the reader again to the statement made by MARSHALL DAY Acoustics regarding the GW 140-3.4MW generator.

I look forward to your positive response to not approving the of the Coppabella Wind Farm AKA the Yass Wind Farm Application, State Significant Development Application Number SSD 6698 Mod 1 **on major lack of fundamental documented evidence on noise levels relevant to this project.**

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I wish to submit an objection against modification and future construction of the Coppabella Wind Farm AKA the Yass Wind Farm Application, State Significant Development Application Number SSD 6698 Mod 1 for the following reason;

Massive potential erosion of the steep Coppabella Range, and one case of "lack of transparency" of the proponent

Post the inaugural Coppabella CCC 5th October 2017 I spoke with an impacted neighbour of the Coppabella Wind Farm who informed me that the access road to the Wind Farm to carry the heavy components required to construct the Coppabella Wind Farm to the site of the Goldwind Coppabella Wind Farm development need to be 8 meters wide, either side of which is to be a 3-meter-wide service vehicle passing lane, total of 14 meters. I passed these figures on to an Earth Moving Company Director Andrew Fields and he immediately came back with some interesting figures that **the NSW Department of Planning and Environment need to consider very carefully before allowing this variation to consent to go forward.** Viz;

With the slope of the ground and the batters on both sides of the road the disturbed area will be between 30-50mtrs wide depending on the slope.

It will be wider in places such as switch backs and U turn areas.

Constructing any structural earth works on a slope more than 18° is not suitable land use.

Given that the Proponent Goldwind's Tom Nielson has already admitted to me that the Coppabella Range is much steeper than the range that they are installing their White Rock Glenn Innes Project on then I'd suggest equivocally that should this project be allowed to proceed then the actions of both the authorising body NSW Department of Planning and Environment and eventually the developers of this project Goldwind themselves will be responsible for creating a precedent for ongoing long term erosion of the presently relatively stable Coppabella Range.

Regards

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I wish to submit an objection against modification and future construction of the Coppabella Wind Farm AKA the Yass Wind Farm Application, State Significant Development Application Number SSD 6698 Mod 1 for the following reason;

A massively increased tower height and whilst Green Bean Page 7 Coppabella Visual Impact Assessment v5 4 September 2017, where it's claimed that the increase in height of these towers from 150 meters to

- Maximum blade tip height up to approximately 171 meters (150 meters for existing consent)

Page 8 of VIA then goes on to say there will basically be negligible increase "in visibility and unchanged visual impact rating in accordance with the approved Coppabella Wind farm project"

Yet simply looking at their increased tower height and rotor swing area attached, as photographed from Goldwinds on Exhibition Folder, then that claim is hard for me to believe.

Regards John McGrath

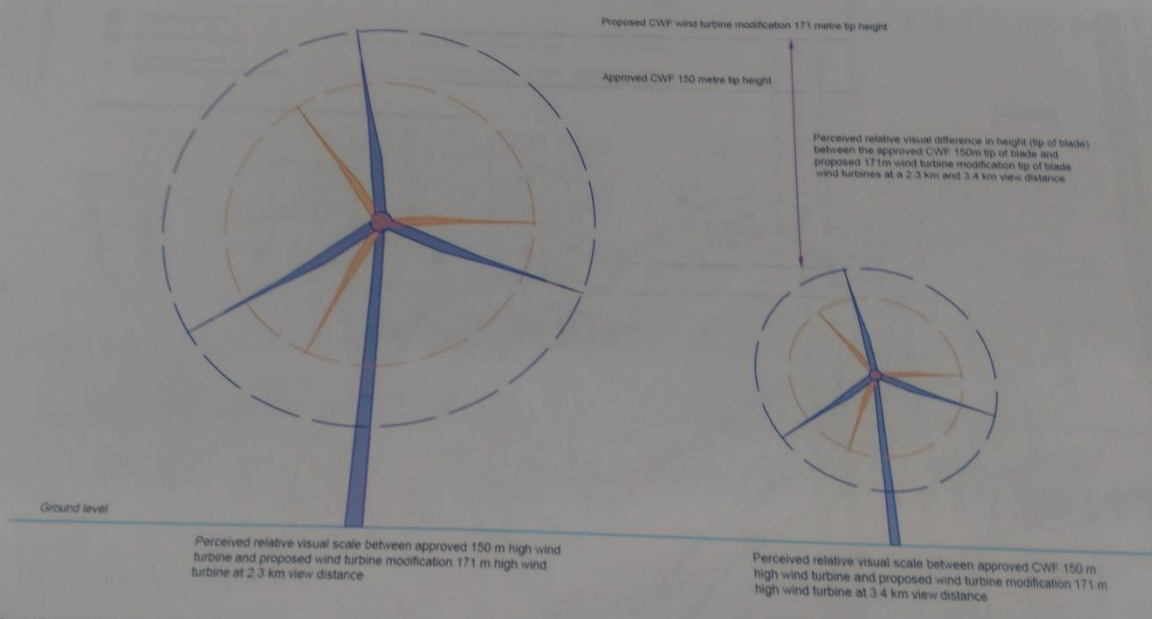


Figure 5-2 Observable difference in consented and modified CWF wind turbines at 2.3km and 3.4km view distance

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I wish to submit an objection against modification and subsequent construction of the Coppabella Wind Farm AKA the Yass Wind Farm, State Significant Development Application Number SSD 6698 Mod 1 for the following reasons;

Due to the large to massive increases in several factors that Goldwind have applied for, these increases in vegetation clearance from the original include;

- 68.3 Ha to 180.9 Ha (estimates only) an estimated increase of 165% in land clearance.

Goldwind's Development Manager Tom Nielson lamented at the inaugural Coppabella Wind Farm CCC 5th October 2017 that they had inherited EPURONs figure via purchase of the project. The "old adage" is "BUYER BEWARE" Applies here.

Goldwind's application for extra vegetation clearance is massive at well over 150% increase, is it not?

- Goldwind also ask for an increase in Wind Tower height from 150 meters approved, to an extended height of 171 meters, citing the uneconomical implications of the smaller tower. This request increase in tower height is near 14%
- Aswell as these 2 large/massive percentage figure increases, they then ask for an extension of blade length, from the approved 60 meters to a 70 meters blade. Resulting in both a massive 36% increase in blade length and thus a massive increase in the Rotor Swing Area.

My suggestion to the NSW Department of Planning and Environment is that these large/massive percentage figure increases be seen and treated as a new Development Application.

This new **Development Application**, now needs rereferring (The Departments "*buzz*" word) to the **Planning and Assessment Commission** and unlike their last effort where this faceless group have done a "desktop analysis" from some distant locality that they have the integrity to meet with the affected community that live surrounding this proposed Industrial Power Generation Development.

Therefore, I am suggesting that this "small modification to consent" be treated as it should be as a new DA and there be no further progress with this development until the process is has been through the right processes which to this point appear to have not been applied.

Looking forward to a positive response

Yours respectfully

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I wish to submit an objection against modification and future construction of the Coppabella Wind Farm AKA the Yass Wind Farm Application, State Significant Development Application Number SSD 6698 Mod 1 for the following reason;

Massive potential for invasive weed seed distribution;

The Coppabella Wind Farm AKA the Yass Wind Farm modification applied for in relationship to the extra estimated increase of an estimated 165% vegetation extra vegetation clearance applied for by Goldwind appears to have neglected the potential impact its implantation and consequent soil disturbance, will have on the distribution of **2 exotic NSW Registered Noxious weeds** endemic to the Coppabella Range.

Namely; Horehound *Marrubium vulgare* and Bathurst Burr *Xanthium spinosum*

Both these NSW noxious weeds are present on the Coppabella Range and this massive land disturbance will consequently allow these 2 weeds to disperse. Both weeds are known as invasive because they will quickly colonised areas of disturbed soil.

Both are dispersed by water run off aswell as adherence to animals, man and machinery.

As the extra vegetation clearance applied will be continuous from host landholders to public roads, and will impact non-involved land holders via seed dispersal via adherence to animals (the seeds of both these plant species can be transported in the bodily covering of many mammals aswell as distributed by birds), man and machinery plus consequent water runoff.

As the main rural income derived from the area surrounding the Coppabella Range is wool production, and that both the listed weeds are known wool contaminants and thus wool clip devaluation, then I feel that Goldwind needs to *produce* a **viable weed control programme** for the areas of land that it intends disturbing via the extra vegetation clearance requested, before this State Significant Development Application Number SSD 6698 Mod 1 be approved.

Current rural landholders are compelled to apply noxious weed control so why not Goldwind?

Once again, I look forward to the DPE **favourable attention** to what appears to be an overlooked issue pertinent to this State Significant Development Application Number SSD 6698 Mod 1.

Regards

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I wish to submit an objection against modification and future construction of the Coppabella Wind Farm AKA the Yass Wind Farm Application, State Significant Development Application Number SSD 6698 Mod 1 for the following reason;

Massive potential for total old growth tree destruction on Whitefield's Lane, and just one more case of "lack of transparency" of the proponent

Post the inaugural Coppabella CCC 5th October 2017 I spoke with an impacted neighbour of the Coppabella Wind Farm who informed me that the access road to the Wind Farm to carry the heavy components required to construct the Coppabella Wind Farm to the site of the Goldwind Coppabella Wind Farm development need to be 8 meters wide, either side of which is to be a 3-meter-wide service vehicle passing lane, **total of 14 meters.** As I had passed these figures on to an Earth Moving Company Director Andrew Fields and he immediately came back with some interesting figures that **the NSW Department of Planning and Environment need to consider very carefully before allowing this variation to consent to go forward.** Viz;

Given that Goldwind expects to be allowed to construct a heavy vehicle access road for the transport of excessive heavy component loads both sides of the road the disturbed area will be between 30-50mtrs wide depending on the slope.

It will be wider in places such as switch backs and U turn areas. (Turning areas into Weston's property and off the Hume Highway onto Whitefield's Lane, will come under this criteria)

Given that the Proponent **Goldwind's Tom Nielson "Development Manager"** has already admitted on the 5th October at the Coppabella Community Consultation Committee meeting that there'd only be the need to remove 20 of these trees. Adding that they Goldwind would replant relevantly suitable trees as seedlings.

After having driven the length of Whitefield's Lane for myself on the 4th October 2017, creating an access track to Goldwind's minimal specifications of 14 meters in width will result in the total destruction of all the trees along this section of roadway.

Then I'd suggest equivocally that should this project be allowed to proceed then the actions of both the authorising body NSW Department of Planning and Environment and eventually the developers of this project Goldwind themselves will be responsible for creating an **unending precedent for long term irreversible tree removal.**

Regards

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Lack of transparency and confidence in the proponents via their representative Development Manager Coppabella Wind Farm.

I am induced to write this submission where it is obvious that there is a lack of knowledge of or resistance to revealing the correct information pertinent to the Coppabella Wind Farm project including lack of transparency of the proponent Goldwinds Coppabella Wind Farm representative Development Manager Mr Tom Nielson.

As a member of the Coppabella Wind Farm Community Consultation Committee (CCC) at our inaugural meeting 5th October 2017, I asked Mr Nielson several questions which I would regard easily answered by someone in his position.

I cite, as this CCC was supposedly an open forum for discussion of the proponents plans for perceived construction of the Coppabella Wind Farm and further given that Goldwind have the job of constructing this proposed Wind Farm, I found Mr Nielson less than open, unwilling or appeared lacking in knowledge on several issues that I would have thought a "Development Manager" representing Coppabella Wind Farm should have had.

At this CCC, he repeatedly made comment, that he'd been in consultation with Transgrid re a connection to the Transgrid's 132KV transmission line. Yet when I asked him e.g. **What is the Transgrid designation..... for that transmission line?** (Which one would think would be quite relevant to somebody supposedly in consultation with Transgrid re connection to their transmission grid), he could not answer me.

Therefore, Goldwind employs a person a Development Manager for a multimillion dollar project such as the Coppabella Wind Farm, and this person does not know where they are to deliver their intermittent power supply? I struggle with the competency of such a person.

Mr Nielson also indicated to me for a person that supposedly been in consultation with Transgrid over a connection to the 99M 132KV Transmission Line (which he did not know the Transgrid designation of), **nor did he know the existing loading** of that 132KV Transmission Line running from Yass 330/132 KV Substation to the Murrumburrah 132KV substation.

Thus, even though Goldwind have applied to construct 79 wind towers for Coppabella Wind Farm and have applied for a modification to same at such an early stage, Mr Nielson was unsure of height, number of towers etc that they'd construct should the NSW Department of Planning and Environment approve this modification. Mr Nielson's lack of vision leaves the local community in general in a knowledge void regarding moving forward with the Coppabella Wind Farm.

Further, given that in July this year on another Goldwind Wind Farm "White Rock Wind Farm" at Glen Innes, 3 "White Rock Wind Farm" construction employees were injured when their ute rolled off an access road to that Wind Farm and all 3 were hospitalised 1 with serious spinal injuries and internal bleeding, I asked Tom Nielson questions about Goldwind's Occupational Health and Safety Policy. Again the "Development Manager" for a multimillion dollar project such as the Coppabella Wind Farm, could not answer even if the company had any effective Occupational Health and Safety Policy. Before commencement of any project there needs to be clear and precise Occupational Health and Safety Policy in place.

It wasn't until after the close of this inaugural meeting that I learnt of the magnitude and the implications of the widths of the proposed access "tracks" to be constructed for the Coppabella Wind Farm i.e. a minimum 14 metres in width, this access track system will implicate Whitefield's Lane and the entire fragile soils of the Coppabella Range ridgeline. I now present this question for the company's Goldwind's Development Manager: At what stage was the magnitude of these proposed access tracks going to be delivered to the community via representatives of the Coppabella Wind Farm Community Consultation Committee?

Therefore, I query the lack of transparency, knowledge or inability of Goldwinds Development Manager to be suitable for this position?

Added to this the discrepancies in Goldwind's "On Exhibition" documentation I ask that the department **reject** Goldwinds Application, State Significant Development Application Number SSD 6698 Mod 1.

Regards
John McGrath