

Submission to the Hills of Gold wind farm DA.

A review of Appendix J – Bushfire Assessment.

Appendix J and, I assume, section 13.4 (Bushfire) of the main body of the EIS were authored by an ERM Principal Consultant.

We are familiar with her work from her authorship of the equivalent bushfire sections in the EIS for our defunct Jupiter wind farm.

In Appendix J, there is no indication of her expertise in bushfires as they relate to wind farms. I too have no formal expertise other than that derived from living on a country property where potential bushfires are at the forefront of your thoughts for half of each year.

ERM's key conclusion (Page 72) is:

“The risk that the wind farm itself will cause a fire is minimal”

Nothing noteworthy in the preceding 71 pages justifies that conclusion.

Writing that statement a total of 4 times in Appendix J and another 4 times in the main body of the EIS doesn't legitimize it.

Let us talk about actualities rather than ERM theory. On page 34 of Appendix J, ERM identifies recent wind farm fires, the most recent being one known as the Currandooley fire (January 17, 2017). The property known as Currandooley hosts approximately 10 Capital wind farm turbines and other wind farm infrastructure.

Remember, the Capital wind farm fire (Currandooley) would not have happened in the absence of the Capital wind farm.

ERM tells us on Page 34:

“the Currandooley Fire in January 2017 was caused when a crow connected with overhead electrical infrastructure, caught alight and dropped into dry foliage underneath a power line that transfers electricity from Infigen's Woodlawn Windfarm to a substation at their Capital Wind Farm. The fire burnt approximately 3,400 hectares and was subject to a class action.”

The “crow” rationale is widely seen locally as questionable, but let us assume it is true. If it can happen within the Capital wind farm infrastructure, surely it can happen within the Hills of Gold wind farm (HOGwf) site, as can lightning strike within the site and surrounds which apparently caused the large 2019 Pages Creek Road fire (7,494 Ha) and the even larger Pearson Trail Complex fire (23,053. Ha) the previous day. (EIS, Appendix J, Bushfire Assessment, Page 36)

No mention is made of the Currandooley fire in the bushfire section (13.4) of the main EIS.

(At the time of the Currandooley bushfire, hundreds of us, mostly downwind (eastish) of the Capital wind farm, were researching our submissions to the Jupiter wind farm, the Jupiter EIS being on exhibition. Over 250 submissions raised the issue of bushfire)

The Currandooley fire was stopped, partially, on my rural road, 800 metres from our property, after marching eastwards for 12 kms. I had evacuated and didn't expect to see my beautiful home again.

The fire was stopped mainly by intense aerial bombing of water and retardants, an option not available within or close to turbines. Those who say otherwise have not seen the DC10 in action.

Flying near, and below the level of, 230 metre turbines for that aircraft would not be the “routine procedure” the Department would have you believe.

The successful local RFS ground crew strategy was to protect individual residences where possible. Only one house was lost.

This fire reinforced that rural New South Wales, destined to get hotter and drier, is a high risk bushfire area and that Low and Medium bushfire risk assessments in previous ERM EISs were a joke.

What did we learn or had reemphasized from the Currandooley (Capital wind farm) bushfire?

- Bushfires do break out on wind farms, despite ERM’s reassurance to the contrary.
- The Capital fire would not have broken out if the Capital wind farm had not been there.
- Proponent staff on-site, if any, were of no help and contractors are not paid to fight fires.
- Any fire fighting equipment on-site was either not used or ineffective.
- The Bushfire Management and Emergency Response Plan, if existing, was useless.
- “advanced on-board control systems designed to mitigate any risk of fire” have little to do with controlling bushfires
- Nobody told the bushfire it couldn’t break out and rapidly travel in so-called low or medium fire risk zones.
- Bushfires in wind farms are unlikely to be contained until well out the other side.
- The access tracks, a key supporting argument, were of no help.
- Bushfires in wind farm country travel very quickly.
- In a bushfire, non-human species of fauna, threatened or otherwise, are ignored.
- Bushfires do not respect different species of vegetation.

The fires of last summer provide all the proof you need.

We were very lucky on January 17, 2017:

- It was not a catastrophic fire day nor a total fire ban day.
- The water resources were almost at their peak.
- There was still a lot of green vegetation around
- There was no other local fire. A large fire endangering Bungendore or Braidwood would have drawn much of the ground and aerial fire fighting resource away.
- At dusk, when the aerial resources had stopped for the day, we had a very heavy short thunderstorm, and,
- Our wind farm had not been built. If it had been, the fire would have continued on its way through the Jupiter wind farm and out the other side.

The Currandooley fire proves that what happens in practice debunks all the theory hypothesized by wind farm consultants and shows how out of touch the Department of Planning used to be by supporting that theory as recently as the Biala Assessment. With the Jupiter Assessment they chose not to take a position as they had plenty of other topics on which to reject the DA.

Let’s go back from the realities of the Currandooley fire to the ERM theory in Appendix J.

The SEARs require that the following **MUST** be addressed:

*“Bushfire – identify potential hazards and risks associated with bushfires / use of bushfire prone land, including the risks that a wind farm would cause bush fire and any potential impacts on the aerial fighting of bush fires and demonstrate compliance with *Planning for Bush Fire Protection 2006* (if located on bushfire prone land);”*

ERM confirms that the **development is on bushfire prone land**:

“The Tamworth Regional Council Bushfire Prone Land mapping shows the Project Area as bushfire prone land (refer to Figure 2.1).”

Figure 2.1 doesn't show that at all. It maps vegetation categories. One must assume that the whole of the project area (excluding the transmission line) is on bushfire prone land. **Is this unique for a NSW wind farm?**

Given widespread community concern regarding bushfires, the Department, in its Assessment, will have to choose its words very carefully. The safest option is to add bushfire risk to the list of reasons why the HOGwf is in the wrong place.

The primary focus of Appendix J is on protecting the wind farm assets. Apart from the developer, financial beneficiaries, and the wind farm insurers, no-one has the slightest interest in the impact of a bushfire on wind farm assets. It would be interesting to know the focus of the local RFS brigades. My suspicion would be that they would concentrate on protecting private property.

In Appendix A to Appendix J - KEY STAKEHOLDER REVIEW OF DRAFT REPORT, there are two documents, the first being a supportive sentence from an RFS manager in Coffs Harbour in response to a wonderfully detailed recall of a phone conversation between him and the author.

The second document is a copy of the insurance receipt for the ERM Partner's Mazda CX5.

I kid you not.

So much for the quality of the document Review.

What is missing, of course, is the opinion of the local RFS people. It appears that local brigade leaders are forbidden from giving their opinions in EISs.

Someone should ask the quoted representative from the Hanging Rock brigade whether his focus would be the Hanging Rock village rather than wind farm assets, given the choice.

Other questions of that come to mind are:

Given an operating Hills of Gold wind farm and a bush fire in the immediate locality, would he take his brigade up to the ridge and fight the fire from there.

Does he believe that the back burning done from the ridge in 2019 would be done with an operating wind farm on the ridge.

Does he believe that:

“Wind turbines, similar to high voltage transmission lines, are part of the landscape and would be considered in the incident action plan, thus not resulting in any increased risk to aerial fire fighters.

Does he believe that lessons were learnt from the Currandooley fire? What were they?

In his opinion, what practical positive and negative impacts does an operating wind farm on the ridge give rise to in a bushfire situation?

Is he concerned for the wind farm employees and contractors scattered across the site should a fire erupt within the site?

Given this cryptic statement in Appendix J, apparently important enough for inclusion:

“The large dam was considered in the Aviation Impact Assessment (Aviation Projects, 2020).

The continued availability of this dam during a bushfire event could not be confirmed.

Is he confident that adequate water resources will be available, especially for protecting wind farm assets?

Does he believe that Appendix J addresses the mandatory issues nominated in the SEARs (see above)?

And lastly, does the presence of a wind farm where proposed, make his job easier or harder?

I'll be interested to read his submission, and that of his Nundle counterpart.

In conclusion, the Department needs to carefully consider the real bushfire risks associated with the HOGwf. Clearly this wind farm in this location is different to most other NSW wind developments. Considerations should include: location on bushfire prone land, surrounding national parks, the terrain, the layout, staff and contractor safety, bushfire history and accessibility.

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