

16/6/2022

Submission of objection to UPC/AC Valley of the Winds Wind Farm project

Introduction

The purpose of this submission is to object to the UPC/AC Valley of the Winds (VOW) Wind Farm. This objection is based on the overwhelming cumulative effects of two giant wind farm proposals on a rural community, a lack of consultation with us by the VOW Wind Farm proponents, errors and omissions in the EIS and the lack of regard for all stakeholders who stand to be adversely affected by this project.

Too many wind turbines for a rural community – a cap on turbine numbers for rural communities required

The proposed VOW and Liverpool Range (LR) wind farms will result in over 370 wind turbines in the Coolah district. This will transform this scenic rural community into a large-scale industrial zone and is simply too many giant towers for any town to cope with. The increased height of 250 m from previous 170 m high towers in other districts has not yet been attempted on such a vast scale. The cumulative effects of such a vast number of turbines on one place cannot be planned for or mitigated adequately, given that no rural community has ever had to face such a massive level of industrial wind farm development before.

By way of comparison, the following lists the number of turbines in various developments that other rural communities will be facing:

- Bowman's Creek Wind Farm – 60 turbines
- Rye Park Wind Farm – 126 turbines
- Thunderbolt Wind Farm – 32 turbines
- Spicers Creek Wind Farm – 122 turbines
- Hills of Gold Wind Farm – 70 turbines

There does not appear to be any coordination between UPC/AC (the foreign owned developer of VOW) and the LR wind farm developer regarding the combined effects of two massive developments in one district. References to the potential effects of both projects (e.g. Appendix D, LVIA, Chapter 13, *Cumulative Visual Impact Assessment*) consistently downplay environmental, visual and social concerns.

It is imperative that NSW Department of Planning and Environment (DPE) give careful consideration on how to provide a balanced outcome for the Coolah district; an outcome that addresses the concerns of all stakeholders, community cohesion and minimising the visual and environmental upheaval. A coordinated approach for NSW is crucial to achieve equitable outcomes for rural towns whereby renewable projects are sensibly shared across the state. An agreed cap on the number of turbines in any rural district would assist in preventing places such as the Coolah district bearing too much adverse transformational change. The proposed 370+ giant turbines and associated infrastructure such as transmission lines is far too excessive for our community.

The primary motivation driving UPC/AC and their VOW project appears to be to maximise the number of turbines and profit, regardless of social division, damage to the local environment and desecration of the district's scenic landscapes. UPC/AC are entirely foreign owned, as such appear to have little concern for the wellbeing of our community, with profit being their guiding metric. Paying money for certain community projects does not in any way offset the landholders and community members who stand to be adversely affected, rather it is likely to further stoke local division.

It is imperative for social cohesion and harmony of our community that UPC/AC and other wind farm developers incorporate concerns of all affected landholders and community members who fear they will be adversely affected by these developments. An equitable and sensible balance that incorporates and addresses the concerns of all stakeholders is critical.

For example, all Turee Creek valley landholders between Vinegaroy Road and the Golden Highway will be adversely affected, and all unanimously object to the UPC/AC project. It is entirely unreasonable for these landholders to suffer the turbines of the Girragulang cluster that will overwhelm the valley, wreck its visual amenity and cause significant land devaluation.

It should be pointed out that on page 66 of the EIS and Figure 2-4, UPC/AC states (in relation to the Girragulang Road cluster), *'Eastern cluster removed to reduce cumulative impact.'* This statement is false and misleading. The landholders concerned, including ourselves, have steadfastly refused all approaches to host turbines in any wind farm proposal. As such, this *'eastern cluster'* was entirely imagined, never possible and should not have been included or mentioned in the EIS. All references to these false claims must be withdrawn.

Lack of consultation

Consultation activities have not focused on all stakeholders with the potential to be directly and heavily impacted by the proposed project. Our first insight into the enormity of the potential impact on our land was the release of the EIS.

Our property 'Turee' is located in the scenic and historic Turee Creek valley, on the eastern side of the Girragulang Road Cluster. We are a large grain producer, as well as cattle breeders. At no stage has any UPC/AC representative approached us about the proposed turbines in the EIS; their number, location, proximity, potential effects on our land or ourselves, our operation, our environment, wildlife, visual amenity and land value. This absence of consultation is extraordinary given the enormous potential effects on us as stakeholders in this project.

The EIS clearly states (Appendix D, 18.0 Conclusion, Pg 89, 2nd paragraph):

'With all visual impact assessments the objective is not to determine whether the proposed impact is visible or not visible, but to determine how the proposal will impact on the existing visual amenity, landscape character and scenic quality. If there is potential for negative impact, this impact, and any mitigation methods must be investigated in order to reduce the impact to an acceptable level.'

The only communication we have received from UPC/AC was an email request in 2019 to put a transmission line through our farm, to which we declined. Clearly, such transmission lines would have a major effect on our grain production operations as well as our local environment.

Surely it is up to the proponents of such an invasive development to clearly communicate all aspects and potential effects to *all* affected stakeholders.

This absence of consultation from UPC/AC and the hosting landholders reveals their disregard for us and anyone in the district who do not want their lands or themselves to be adversely affected by such large-scale industrial developments. The proponents of this project appear to be prioritising financial returns over the local environment, prime agricultural land and people. Their actions will lead to the upending of the beautiful Coolah district into an industrial zone of giant towers, iron and wires.

The exact location of each wind turbine is difficult to determine due to the obfuscation apparent in the EIS. The use of a planar coordinate reference system which must be converted in Google earth to determine exact turbine locations demands a multi-step process that many people would find difficult to navigate. Maps provided do not offer clear and specific turbine positioning and provide no clarity on how the turbines will look from ground level. The absence of consultation by UPC/AC and their avoidance in providing clarity and detail suggests a deliberate attempt to withhold critical information from the community. For example, there has been no detailed visual impact assessment report done to clarify how all landholders in the Turee Creek valley will be affected. Such an assessment should provide actual scale photo montages along Tongy Lane at say 2 km intervals to display the actual visual impact of these turbines on the Turee Creek valley and affected landholders. No such assessment has been done.

Instead, the EIS (Appendix D, LVIA pg. 72) makes little mention of how Tongy Lane landholders will be affected:

'The Cumulative ZVI indicates areas along Tongy Lane may have views to both the VoW and LRWF Projects. Views from Tongy Lane to the VoW Project are largely contained to the GR Cluster of the VoW Project. Views to the LRWF Project will be visible in the distance in excess of 8 kilometres. Localised vegetation is likely to fragment views to the distant turbines.'

Other references that attempt to downplay potential effects are simply false (Appendix D, LVIA pg. 80, LCU 02):

'The scenic quality of the LCU will be slightly altered as a result of the proposal.'

A more transparent approach should apply along all roads around Coolah where surrounding scenic countryside stands to have its visual amenity substantially affected, including The Black Stump way, to clarify how the Coolah Valley will be transformed. Instead, UPC/AC seems to be providing images of cherry-picked locations around the district where visual amenity would be less affected, the use of fish-eye lens in pictures to 'push back' the background (examples include Appendix D, LVIA - Image 14 pg. 24; Figure 36, pg.83) as well as the omission of photo montages of how highly affected areas will look after development is completed.

For many landholders such as ourselves, our land is our home. We live and work every day in our land and our home. Those of us who are likely to be heavily affected should be provided with clear visual representations from selected points on their land, not just the dwellings. This would assist in clarifying how our properties will be affected in terms of visual amenity and cumulative impacts including potential land devaluation. This would represent a transparent and honest consultation about how all stakeholders will be truly impacted.

The apparent approach of the EIS instead seems to be to obfuscate the project's enormous potential effect on visual amenity around Coolah, and as such is misleading the community about the entirety of change that will be brought upon the district.

It would appear there are turbines planned within 0.5 nm of our western boundary. This will have an enormous affect on our Croppy Creek and Turee Creek valleys. I live and work in this country every day, this is where I spend my waking hours. No-one has sought to detail how this project will affect

myself, my family, our land, our wildlife and our business. This approach points to the apparent disregard the VOW proponents have for many people that stand to be adversely affected by this enormous industrial project.

Errors and omissions

- Appendix D, section 5.3.1 of the EIS has omitted reporting that large areas potentially affected by the project are declared Biophysical Strategic Agricultural Land (BSAL) by the Department of Planning & Infrastructure (see maps 30 & 31), as well as State Significant Agricultural Land (SSAL) by Department of Primary Industries (<https://nswdpi.mysocialpinpoint.com/ssal>). In addition, Figure 5 misidentifies many grain production areas to the east as grazing only. This appears to have been done to water down the likely adverse effects on neighbouring landholders.
- The EIS has not referred at any point to our aircraft landing area (ALA location -31.92539, 149.79579). This airstrip at over 1 km in length and with a downhill start, is capable of launching AT 802 Air Tractors with a full payload of 3000 L. We have 200,000 L of water storage at the top of the strip, making it a potentially invaluable resource for firefighting. We and other farmers in the district also use the strip for aerial agriculture such as spraying, fertiliser application and pest control in crops. There are few ALA's in the Coolah district with this capacity.

This ALA is only 1.0 nm from the wind farm boundary. It is hard to be precise given the absence of clarity of turbine locations, however the distance from this ALA to the nearest turbine appears to be 1.5 nm, or less than 2800m. Appendix I, Aviation Impact Assessment, pg 44 states *'the effects of wake turbulence could be noticeable at a distance of 2880 m (16 times rotor diameter) from the proposed wind turbines.'*

This means that potentially crucial aerial fire control assets as well as ongoing aerial agriculture stand to be restricted and possibly disabled by this development. However, it appears that UPC/AC are not even aware of this airstrip, likely due to the absence of consultation or interest by them.

- The EIS has only listed three dwellings on our property; there are actually four dwellings on 'Turee'. This again reflects the lack of consultation and knowledge by UPC/AC.

Increased potential damage and loss from bushfires and air space restriction

Difficult access in the proposed wind farm and surrounding areas makes ground firefighting highly dangerous. For this reason, fire fighting in the Coolah district during the Sir Ivan Fire was largely done by air. Large fire fighting aircraft in future fire events will no longer have open and safe access to bombing the fire fronts in and around the VOW project.

In the event of smaller firefighting aircraft being required, we have been advised that fully laden AT 802 Air Tractors require up to 1 km for turning given variable wind conditions and terrain. The proposed turbines can therefore only restrict access for aerial fire control for all aircraft types, which will mean that property, wildlife and livestock will be at higher risk of damage and loss. More importantly, the loss of life would also clearly be an increased risk.

In addition to our ALA being ignored as a potential critical fire management resource, our large dam (location -31.90660, 149.764545) was not mentioned either. This dam was used extensively during the Sir Ivan Fire by helicopters for water access given its open aerial access and proximity. Given its scale and plentiful water, it will likely hold accessible water for helicopters in future fire events when other dams may be too low after a dry year. This dam is located in close proximity to the proposed wind farm, yet there is no mention of this important fire management resource in the wind farm EIS, how access and flight paths necessary for fire control in surrounding areas may be restricted, and the associated adverse outcomes that may arise. Once again, the lack of consultation of **all** affected stakeholders has led to critical omissions and considerations UPC/AC.

At this point in time, successive high rainfall seasons have produced enormous fuel loads that are now in excess of those prior to the Sir Ivan Fire. There is now catastrophic fire potential in coming summers.

The potential restriction of our ALA and our large dam near our western boundary for firefighting purposes is now, in this submission, being formally noted so that liability for increased loss of lives and property from future fire events can be directed at UPC/AC.

Wildlife

We maintain a wildlife corridor along the western side of Steels Ridge, one of the few properties in the district that offer a safe haven to encourage wildlife protection and diversity. The southern section of this falls within 1 nm of potential turbine locations which will likely subject native fauna to infrasound, shadow flicker, as well as bird and bat deaths from blade strike. The extent to which various species will be affected is not clear. Appendix G, the Biodiversity Assessment Report, section 3.2.1 admits that assessment of threatened species and habitat outside the wind farm boundaries has been '*inferred*' using '*desktop*' methods. This means that inadequate research forms the basis for any adverse effects that biophysical environments surrounding the wind farm may suffer.

We have three pairs of Wedge-tailed eagles in the Croppy Creek valley alone, as well as several bat species, kestrels, kites, parrots, honeyeaters, kingfishers – to name a few. As custodians of this land, we feel responsible for *these* birds and other wildlife that live here. The notion that the deaths of our birds can be '*offset*' based on an approach that involves trading the lives of some native fauna for '*ecosystem credits*' portrays a scheme based on grotesque and abstract logic. We find this method of justification abhorrent and offensive.

Loss of visual amenity and land devaluation

As previously described, it appears from the oblique information buried deep within the 500+ page EIS that the Turee and Croppy Creek Valleys will be heavily affected visually, will suffer the negative effects of infrasound and shadow flicker, as well as the cumulative impact on wildlife, land management and property devaluation.

Appendix D, 5.8 and related Appendix B3 states that '*The Scenic Quality Rating of Agricultural flats has been assessed as low.*' Incorporating this subjective approach appears to be an attempt to undervalue the overall visual amenity of places such as the Turee Creek Valley where creek flats, waterways, undulation and timbered areas combine to offer a truly beautiful valley. Placing giant

250m high turbines all along one side of this historic valley will absolutely and permanently overwhelm and desecrate this scenic landscape. UPC/AC is attempting to dilute the high visual amenity on many areas in the district by referring to these subjective methods to justify their plans. Again, an accurate and inclusive visual impact assessment report would reveal significant negative impact on picturesque and iconic places such as the Turee Creek valley. The absence of such transparency highlights the UPC/AC's approach to obfuscate the negative transformational effects of their proposal on our community.

Potential for industrial style obstacle night lights on turbines

It is also possible that lights on the turbines may have to be fitted for air safety reasons. This would spoil the night sky and transform the horizon into an industrial city-like array. In other wind farm developments, CASA has ultimately considered that various wind farms (e.g. Hills of Gold) will be a hazard to aviation safety and recommends that such wind farms are obstacle lit with steady medium intensity red obstacle lighting in accordance with the National Airports Safeguarding Framework Guideline D "Managing the Risk of Wind Turbine Farms as Physical Obstacles to Air Safety". International standards require, and the NASF guidelines recommends, 2000 candela lighting intensity.

UPC/AC should be transparent about the potential for obstacle lighting, the effects this may have on the night sky and the local community.

Conclusion

The EIS for the VOW wind farm is shaped by UPC/AC's apparent priority of maximising turbine numbers regardless of the cost to our rural community. The VOW project will adversely affect stakeholders outside the wind farm boundary, the local environment and result in the transformation of the scenic Coolah district into a disfigured large scale industrial zone of giant towers, iron and wires.

The EIS contains many errors and omissions, and appears to under-report and obfuscate the enormous potential effects on the Coolah district in order to gain approval.

Donations to local town projects *do not* offset or address the concerns of surrounding landholders and community residents who will be directly and heavily affected by this development.

The adverse impacts on the Coolah district of the UPC/AC VOW project are too substantial, given the cumulative effects of the adjoining LR wind farm.

The UPC/AC VOW project as proposed is not in the public interest and should not proceed.

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