

I would like to register my objection to the proposed wind farm by UPC Renewables Australia Pty Ltd located near Coolah NSW.

Having looked at the Environmental Impact Study (EIS), there are multiple errors and inaccuracies. Some impact directly upon our farm, residence, business and recreational activities.

I believe the applicant, UPC Renewables Australia Pty Ltd have not undertaken due diligence in the preparation of their EIS. They have not fully investigated the potential impacts, relying on mostly desktop reports and modelling. They have not undertaken detailed consultations with all recommended bodies as recommended by the Planning Secretary's Environmental Assessment Requirementsⁱ. Neither have they fully informed neighbouring properties of these impacts that will affect their daily lives and possibly their health, as is recommended in the Australian Energy Infrastructure Commissioner's Neighbour Mattersⁱⁱ *"effective neighbour consultations as part of any due diligence and approval criteria"*.

Our residence is approximately 3.8km from the Girragulang Cluster, identified as Dwelling 284 in the EIS. Whilst the submission claims consultation with neighbouring landowners, we have never been contacted by anyone connected to the wind farm project, prior to the EIS being submitted. We have never been approached for any impact studies, yet it is obvious that we will be impacted negatively in a number of key areas.

We have erroneously been identified multiple times throughout the document as an "Associated Dwelling". This is totally incorrect. As such we have been ignored as far as consultations, assessments and studies leading to false conclusions in the figures presented by UPC Renewables. This alone should void the entire EIS as all submissions are being made on the data presented in the EIS.

Visual Impact

The statement that *"a visual impact assessment from the project found a total of 112 non participating dwellings within the blue line of visual magnitude (4950 metres from the nearest turbine)"*ⁱⁱⁱ and its associated data and map^{iv} show us (as mentioned above) as incorrectly listed as an "Associated dwelling". Therefore the findings of the visual impact statement are wrong. A number of other maps, tables and figures in the EIS and its Appendixes also list our dwelling as "Associated".

As we have been incorrectly notated as "associated", the desktop visual impact study did not include our dwelling in their data in Appendix E', so we have no real idea of how many wind turbines we will be able to see. Neighbouring dwellings at a lower elevation have been estimated to see between 67 and 69 turbines.

The environmental assessment overview states that current vegetation, topography etc. "would assist in reducing the visual impact of the project"^{vi}. However, an elevation comparison with our dwelling sitting amongst lightly timbered country and well within the stated 4950 metres of visual magnitude, shows the wind turbines (probably in excess of 70, perhaps far more) would become a

dominant part of our western skyline, towering over our dwelling, our workplace and all of our western fall country.

We do not wish to look out upon multiple wind turbines every time we step out the door of our home, look out the window, or undertake our outdoor work each day.

Very few photo montages are provided in Appendix D. The montage of the Girragulang Cluster from the Golden Hwy, Uarbry^{vii}, at a distance of 7.72km show giant wind turbines, dominating portions of the skyline. As we are less than half this distance from this cluster, we can only imagine how much bigger these wind turbines will appear, covering most of our western skyline. A montage should be provided to EVERY dwelling within 10km so that they can understand how these wind turbines will appear. Without these, it is conjecture and imagination – how can the community make an informed decision as to the visual impact these 250 metre tall turbines will have on their lives?

We own another property atop the Great Dividing Range, that is approximately 9km from the Girragulang Cluster, which is classed as too distant to be considered for visual impact. Yet from our high vantage point, we will be able to see the whole of the UPC development. The Australian Energy Infrastructure Commissioner's Neighbour Matters^{viii} state *"This indicative distance range for consultation may need to be greater in situations where, for instance, wind turbines are proposed to be erected on an elevated ridge"*. Note that this report is from 2020 and was written when wind turbines were not 250 metres high, as in the UPC proposal. With the UPC development on ridgelines, neighbours further than 4950m away should be contacted, with at least visual assessments and montages done for each.

We also note with dismay that the visual impact assessments undertaken in the EIS appear to only be taken from the perspective of dwellings. Yet our dwelling is just a part of our farming property. Farming is outdoor work and we will be exposed to the wind farm impacts at more locations than just our dwelling. As our place of work, we spend the vast majority of our days on various locations around our farm, therefore impacts on the whole of our farm (and all neighbouring working farms) should also be taken into consideration.

We chose 20+ years ago to live and work in a peaceful rural setting and built our house to appreciate the views and the wide open sky, a choice reflected in our preference for a park-like yard, not full of gardens and garden trees. The intrusion of multiple wind turbines dominating our western skies from this development (in addition to wind turbines in the Liverpool Range Wind Farm to our northern views) will destroy this forever.

At the Central West REZ: Landholder Session, held at Dunedoo on 15 June 2022, the head of Energy Co was talking about wind turbines and how future projects were likely to be offshore. Upon answering a question from the floor about the residents along the coast seeing the wind turbines, he replied that no they wouldn't like to see them, but they would be 20km offshore so that won't be a problem. Can I assume from this statement that people living along the coast can't be expected to live with the visual impact of wind turbines, but we must? Are we second class citizens?

Noise

With regards to noise impact, Figures 7-2 and 7-3^{ix} show our dwelling falls within the operational noise level contours. Appendix F once again incorrectly places us as an associated dwelling in the maps and tables, so our dwelling comes under a higher level of acceptable noise (45dB L instead of

30dB L) ^x. Appendix F also indicates an Associated Dwelling as one where a noise agreement has been formalised between the landowners and the proponent.^{xi} Yet this is obviously incorrect - another error in the EIS and its appendixes, when submissions are being made that rely on the data presented.

Our location is unique in that our dwelling is placed back from Tongy Lane (a quiet road), with background noise consisting mostly of birdsong and breezes, with the occasional distant vehicle or aeroplane noise for very brief periods. A reading on a handheld decibel reader on our front verandah at 9pm on cold night with a light breeze, when sound is likely to carry on 11 June 2022, gave a background noise of 0 decibels. The same reader was used at 8AM on 12 June 2022 and gave a background noise that varied between 0 and 23 decibels (the latter peak reading was intermittent nearby birdsong).

The report estimates that our dwelling will receive approximately 30 dB L from projected noise contours, yet the report in Appendix F appears to be totally undertaken from modelling. Appendix E, the Background Noise Report was compiled by a survey on only 13 locations out of the many that could be affected and none in the vicinity of our dwelling. Regardless that the NSW Noise Assessment Bulletin says that 30dB L is acceptable, this broad assessment does not differentiate between cities, towns, villages or rural locations. Yet it is obviously very different from our perspective. In a rural area ANY increase over our current noise level is intrusive and unwelcome.

How can UPC Renewables create the EIS when noise levels, that can negatively affect people's health and general life, have so little hard data from the ground and are not considered from a rural dweller's perspective?

We value the peace of rural living and do not wish any additional noise to intrude upon us. We currently experience extremely low levels of noise from artificial sources. When they do occur they are for very brief periods (minutes), not every minute of every day as would happen with the wind turbines. As we are clearly within the Girragulang Cluster's noise contours, we WILL be impacted by noise from this Cluster.

Blade Glint

The EIS mentions the impact of blade glint. Our dwelling is at a higher elevation than other dwellings along Tongy Lane and could well be impacted. However, no blade glint study (or any other type of study) has been undertaken near our dwelling to assess the impact this (or any other negative factors) may have on us.

Aviation Risk

We are involved in the field of aviation and have a long-standing agreement with the owner to use and maintain the Ozton Tongy ALA. This airfield is 1.8 nautical miles from the Girragulang Cluster^{xii}. We regularly use this airfield for both business and recreational purposes.

This airfield has been established for close to a century and has been in constant use throughout the years. It has a historical connection as an alternate airfield for Coolah, a reason for its second runway. Within easy flying distance from Mudgee, many recreational pilots fly in and land at the strip, so the circuit area needs to be clear of hazards for pilots of all experience levels.

The EIS clearly states the circuit area of Ozton Tongy ALA will be affected by the wind turbines in the Girragulang Cluster, with aircraft experiencing wake effect in the circuit area^{xiii}. This will heavily impact our business and recreational activities and as such we do not accept that the Girragulang Cluster can proceed.

Telecommunications

In an area already impacted by poor mobile phone coverage, the possibility of mobile phone service frequencies being further impaired by the wind turbines as stated in the EIS^{xiv}, is of concern to us. With technology requirements already pressing what we can do with the little service we have, any loss to our mobile phone coverage will directly impact negatively on our business processes. Radio reception is also patchy and likely to be completely inaccessible with any level of interference.

Appendix J summarises the effects we will encounter in a patchy reception area as *“There is some potential for increased interference to point-to-area style services such as mobile phone and radio broadcasting signals in areas with marginal coverage”^{xv}*. The mitigation suggestions (move to a different/higher location, change providers, erect more/taller aerials etc) are inadequate.

A satellite connection provides our internet connection and television provision is through both satellite and external antennas for free to air channels. The EIS states that a number of “associated” dwellings may be impacted^{xvi} and Table 2 in Appendix J^{xvii} specifically states our dwelling is likely to have satellite services intercepted by the project. Table 18 in Appendix J (EMI and EMF Health Impact Statement) lists our dwelling as located in a potential interference zone^{xviii} as do Figures 21 and 24 in also in Appendix J^{xix}. Once again, the allocation of our property as “Associated” is giving false data. The mitigation suggestions^{xx} are inadequate, costly and time consuming. This impact is another major concern as internet capability is essential for undertaking our business.

All of these factors will negatively impact our quality of life and the enjoyment from living in our rural setting. It is also likely to negatively affect our property value^{xxi} since data from more recent comprehensive studies on land values nearby to Wind Farms in Australia is not available.

Wider Community Impact

Biodiversity

The EIS Biodiversity Report (Section 8) concentrates heavily on surveying the vegetation within a 500m buffer zone of the proposed wind turbines. As farmers that follow permaculture practices, we are very concerned with maintaining the health of our productive land and grasslands, and that includes maintaining our levels of native flora. It is alarming that many vulnerable and endangered species cover the proposed project areas. Given the extent of construction and infrastructure in this area, how can this be acceptable?

We are constantly battling to remove imported pest species to protect our productivity, but native fauna rarely impedes our farming. We therefore strive to protect the delicate ecological balance of our local flora and fauna. Appendix G mentions a number of vulnerable species of native fauna that fall within the surveyed area^{xxii} which is an area of concern to us. We strongly disagree with the mitigation measures of buying biodiversity credits^{xxiii} for destroyed habitats, flora and fauna, as this does NOT protect our flora and fauna at a local level.

The koala study was brief with observers looking for scat under selected trees for 2 minutes in June 2021^{xxiv}. This study is not sufficient.

The study of aerial fauna in particular, was minimal in nature, consisting of a single observer identifying any birds within a 20 minute period, with surveys between August 2020 and May 2021^{xxv} randomly over the 37 sq km of the proposed wind farm area only. With such limited survey times and at random locations, the study is incomplete as less prolific aerial fauna would have been missed.

Of note, the Preliminary Biodiversity Report (Appendix 3) states the area is likely to contain the critically endangered Swift Parrot^{xxvi} and the Atlas of Living Australia shows this area falls within this parrot's range. The Swift Parrot is a migratory and nomadic bird, following the nectar from vegetation throughout its journey, however the very brief aerial fauna study did not record a Swift Parrot, so it was deemed to be "not affected with no further assessment required"^{xxvii}. Yet an observer in Uarbry (in close proximity to the Girragulang and Leadville Clusters and a proposed transport corridor for access to the project) on 17 June 2022 identified the Swift Parrot call^{xxviii}. Such arrogance by developers and such inadequate studies is why our fauna ends up on endangered lists.

The Wedge-Tailed Eagle was identified in the baseline study with 21 individuals recorded^{xxix} and 58 individuals recorded in Table 40^{xxx}. Wedge-Tailed Eagles frequent open and lightly timbered grazing land^{xxxi} (the type of land of most of the proposed development) and can fly up to a height of 1800m^{xxxii}. Pairs of Wedge-Tailed Eagles are frequently seen in the Tongy Lane area, which will be impacted directly by the Girragulang Cluster. Whilst not a vulnerable species they ARE a protected species. These birds are slow to breed with only 2 eggs per season and are territorial^{xxxiii}. Other aerial fauna may also be impacted with 16.3% of raptor species identified during the scant surveys as flying more than 40 m above ground^{xxxiv} increasing the probability of collision.

An Australian wind farm review quoted in Appendix G, has recorded collisions by aerial fauna including the Wedge-Tailed Eagle^{xxxv}. Another table in Appendix G, lists the likelihood of a Wedge-Tailed Eagle collision with the wind turbines is "*almost certain*" with the birds having a previous strike mortality recorded.^{xxxvi} The report also^{xxxvii} states the probability of a Wedge-Tailed Eagle colliding with a wind turbine is 10.92%. This reinforces an article in Quadrant^{xxxviii}, where it states there is a very real impact on the Eagle population from wind turbines.

Locals in the areas affected by the Sir Ivan Fire in 2017 (including the Girragulang and Leadville Clusters) have only recently noticed a return of pre-fire flora and fauna. The studies were mostly undertaken while the flora and fauna were still damaged and in recovery, negating any real-world perspective (i.e. in normal times not affected by severe disaster).

Thus, the flora study needs to be more considered for its potential detrimental impact in a normal year. The fauna and aerial fauna studies are inadequate and more thorough studies needs to be undertaken for a more accurate understanding of the biodiversity of the area (both within the windfarm boundaries and for at least a few kilometres outside those boundaries allowing for fauna movements).

Biosecurity

What measures will the developer take to protect the biosecurity of the district, in particular the neighbouring farms? As farms producing grain and livestock surround the proposed development, the introduction and spread of weeds to our land can be disastrous and have long term consequences and costs. With the dramatic increase of traffic and infrastructure, introduction of, for example, weeds of national significance such as parthenium weed^{xxxix} is of great concern to every farm.

Traffic & Transport

The nearby, small village of Uarbry will be heavily impacted by traffic and transport during the construction phase of the Girragulang cluster. Residents of this village value their position off the main road and have never entertained the thought of hundreds of vehicles travelling through their small streets over a period of months (or years) when their current traffic flow is a few cars per day. Table 9-3^{xl} indicates a current existing daily traffic volume for Short Street, Turee Street and Main Street (all located in the village of Uarbry) as being under 100 per day. Whilst this description is technically correct, with under ten residences in Uarbry, it is inaccurate. The real traffic flow is well under 20 per day, including random travellers and nearby landholders. Table 9-6^{xli} indicates ADDITIONAL daily volume of construction traffic of 344 vehicles. This will substantially impact their quality of life from the noise/vibration of hundreds of vehicles per day as well as the impact of access road construction.

The proposed route through Uarbry extends to Moorefield Road (east^{xlii}). This unsealed road is even less used than those in the village. While the proposed route does not go directly past the Uarbry Cemetery, it is very close, at approximately 100m from the road and the vibration from heavy vehicles and high traffic flow may impact some already delicate monuments in the historic cemetery, with burials going back to the earliest days of Uarbry (earliest monument 1863^{xliii}).

Transmission Line Corridor

Another glaring error in the EIS is the location of the proposed corridor for powerline connection^{xliv}. The power corridor in the submitted maps^{xlv} by Transgrid was removed for consideration some months ago. The current proposed corridor is by Energy Co and is located at a more northerly location. Providing an outdated map is incorrect information, giving a false view of the proximity of the UPC development to the transmission corridor.

Economic

Whilst the EIS espouses the economic benefits it will bring to the district, the only people that will directly benefit within the community are those few landholders with wind turbines located on their properties. Employment opportunities will be minimal as most of the construction work will be undertaken by skilled labour that is imported to the district. These workers will be here short term, so the community will not benefit from their families moving here, attending the local school, buying houses or opening businesses. Supply contracts, if offered, will be occasional and will likely be on a tender situation which will be open to the rest of Australia. Token amounts contributed by UPC Renewables to community organisations will not make any real difference to our community and is readily seen within the community as bribery.

UPC Renewables Australia Pty Limited, who is the applicant for the wind farm development is the

Australian arm of a global renewables company. Australia will not benefit from supporting this project from a foreign owned, private money-making entity. The wind turbine components are made overseas so our manufacturing industry will not benefit. The power generated will be sent to larger centres, so our community will not benefit from lower electricity costs. The Energy Co transmission lines to connect it, is made of particularly large, invasive and ugly towers, with no landholders wanting these structures on their property.

Summary

A full review of the EIS is beyond my personal scope in the limited time available, however I have noted multiple errors, inconsistencies and omissions in the EIS and its accompanying documentation which raise serious concerns. Overall the EIS shows a lack of consultation. The data has been compiled from scant surveys, relies heavily on modelling and is presented in a way to favour the proposal. Our property being listed as “Associated” has skewed the data presented, throughout multiple chapters and appendixes and I have heard colloquially of other dwellings also miscategorised, skewing the data more. I find it hard to believe that a submission with so many errors can be considered for submissions when it should have been rejected for not meeting the essential criteria.

Our family has lived in the district since the times of earliest settlement in the 1840s. We purchased this property over 30 years ago, well before there was any thought of wind turbines, yet we are having this wind farm thrust upon us – changing our lives forever.

The community, particularly neighbouring landholders, will suffer negatively from multiple causes from the wind turbines – both during their construction and use, with negligible economic benefit. The Coolah district possesses profitable agricultural businesses with land valued for its productivity and with residents who value their quality of life. This wind farm project is NOT beneficial to our community.

With the multiple negative impacts I have listed that will directly affect our farm, business and family - visual, noise, blade glint and telecommunications; the acknowledged aviation risks from the Girragulang Cluster on the Ozton Tongy ALA and our aviation activities; the impacts of heavily increased traffic on the village of Uarbry; and the inadequate consideration of aerial fauna and vulnerable flora and fauna, I cannot support the approval of the UPC Renewables Australia Pty Ltd wind farm project.

ⁱ <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-10461%2120200608T204617.446%20GMT>

ⁱⁱ <https://www.aeic.gov.au/observations-and-recommendations/chapter-2-neighbour-consultation-agreements> Section 2.2.1 and 2.2.2

ⁱⁱⁱ Valley of the Winds Environmental Impact Statement (EIS) April 2022, Summary, Environmental assessment, page 3/502

^{iv} Valley of the Winds EIS April 2022, 6. Landscape Character and Visual, page 171/502

^v Valley of the Winds EIS April 2022, Appendix E, Detailed Dwelling Assessments (non-associated dwellings only were included).

^{vi} Valley of the Winds EIS April 2022, Summary, Environmental assessment, page 2/502

^{vii} Valley of the Winds EIS April 2022, Appendix D, page 19

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- viii <https://www.aeic.gov.au/observations-and-recommendations/chapter-2-neighbour-consultation-agreements>, 2.2.1
- ix Valley of the Winds EIS April 2022, 7. Noise and Vibration, Figure 7-2, page 221/502, Figure 7-3, page 224/502
- x Valley of the Winds EIS April 2022, Appendix F, 5.1.1 and 5.1.2, page 27
- xi Valley of the Winds EIS April 2022, Appendix F, 1.2, page 10
- xii Valley of the Winds EIS April 2022, 10.2.2. Assessment of Potential Impacts page 295/502
- xiii Valley of the Winds EIS, April 2022, 10.2.2. Wake Turbulence page 296/505
- xiv Valley of the Winds EIS, April 2022, 10.3.2 Mobile Phones page 301/502
- xv Valley of the Winds EIS, April 2022, Appendix J, page 30.
- xvi Valley of the Winds EIS, April 2022, 10.3.2 Satellite Television and Internet page 301/502
- xvii Valley of the Winds EIS, April 2022, Appendix J, Table 2, Satellite vectors with potential to be intercepted by the proposed Project, Page 22
- xviii Valley of the Winds EIS, April 2022, Appendix J, Table 18, Dwellings with increased potential to experience EMI to DTV from television broadcast tower. Page 75
- xix Valley of the Winds EIS, April 2022, Appendix J, Figure 21, Potential television EMI zones for the Central Western Slopes broadcast tower from the proposed Project. Page 97, Figure 24, Potential cumulative EMI impacts to television signals from the Central Western Slopes and Coolah broadcast towers, page 100
- xx Valley of the Winds EIS, April 2022, Appendix J, 3.12.3, page 22
- xxi Valley of the Winds EIS, April 2022 16.3.4 Land Value Impacts, page 419/502
- xxii Valley of the Winds EIS, April 2022, Appendix G, pages 74 and 75
- xxiii Valley of the Winds EIS, April 2022, Appendix G, Executive Summary, page v
- xxiv Valley of the Winds EIS, April 2022, Appendix G, section 4.2.10 page 100
- xxv Valley of the Winds EIS, April 2022, Appendix G. Section 4.2.7.1. page 86
- xxvi Valley of the Winds EIS, April 2022, Appendix 3, page 61
- xxvii Valley of the Winds EIS, April 2022, Appendix G, page 219
- xxviii Refer Perry Fulton, Uarbry.
- xxix Valley of the Winds EIS, April 2022, Appendix G, Table 37 page 132
- xxx Valley of the Winds EIS, April 2022, Appendix G, Table 40, page 136
- xxxi Olsen, P. (2005). *Wedge-tailed Eagle*. Australian Natural History Series. CSIRO Publishing.
- xxxii <https://birdsflight.com/wedgetailed-eagle-facts-wedgetailed-eagle-diet/>
- xxxiii <https://birdsflight.com/wedgetailed-eagle-facts-wedgetailed-eagle-diet/>
- xxxiv Valley of the Winds EIS, April 2022, Appendix G, page 136
- xxxv Valley of the Winds EIS, April 2022, Appendix G, page 143
- xxxvi Valley of the Winds EIS, April 2022, Appendix G page 162
- xxxvii Valley of the Winds, EIS, April 2022, Appendix G page 163
- xxxviii Quadrant, 16 September 2019, Wind Energy and the Extinction of Eagles by Aynsley Kellow
- xxxix <https://weeds.dpi.nsw.gov.au/Weeds/PartheniumWeed>
- xl Valley of the Winds EIS, April 2022, Table 9-3 Daily traffic volumes, page 271/502
- xli Valley of the Winds EIS, April 2022, Table 9-6 Forecast Daily Traffic Volumes, page 280/502
- xlii Valley of the Winds EIS, April 2022, Table 9-1 Major and Minor Roads page 268/502
- xliii <https://www.findagrave.com/cemetery/2376628/uarbry-general-cemetery>
- xliv Department of Planning and Environment, Notice of Exhibition-Valley of the Winds Wind Farm (SSD-10461) letter to landowners 19 May 2022.
- xlvi Valley of the Winds EIS, April 2022, Figure 1-2 Locality Plan, page 33/502; Figure 18-1 Planned and existing projects within the immediate region, page 454/502.