

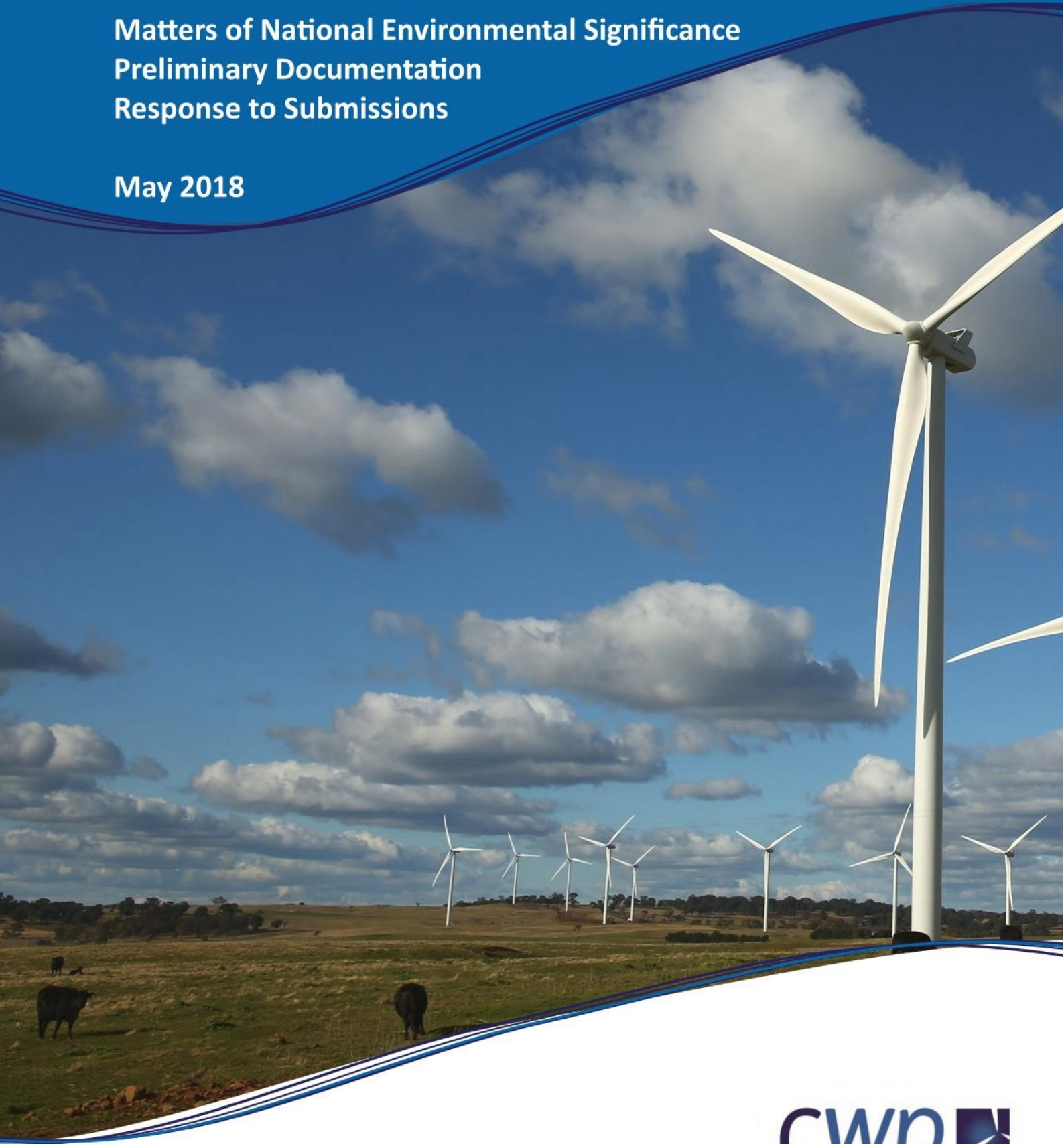
Proposed Development of

# Bango Wind Farm

Southern Tablelands, New South Wales

Matters of National Environmental Significance  
Preliminary Documentation  
Response to Submissions

May 2018



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# Bango Wind Farm- Preliminary Documentation

EPBC No.2013/6810

## Response to Submissions

### Introduction

Bango Wind Farm Pty Ltd is planning to construct a wind farm near Boorowa, NSW. The proposed project will consist of up to 75 wind turbine generators and produce clean energy for approximately 90,000 homes.

The project has been determined to be a 'controlled action' (EPBC 2013/6810) under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The controlling provisions under the EPBC Act are 'listed threatened species and communities' (Sections 18 and 18A) and 'listed migratory species' (sections 20 and 20A).

The Commonwealth Department of the Environment and Energy has advised the project will be assessed by preliminary documentation entitled *Proposed Development of Bango Wind Farm, Southern Tablelands, New South Wales, Preliminary Documentation, March 2018 (EPBC Ref: 2013/6810)*, found in the accompanying document. This preliminary documentation describes the impact and proposed mitigation measures for threatened species and communities and listed migratory species. The original referral can be found as Appendix 1 of the Preliminary Documentation.

The Preliminary Documentation was exhibited for public comment from 26<sup>th</sup> April until 10<sup>th</sup> May 2018, and 13 public submissions were received. The following document outlines those submissions and explains where the relevant issues raised have been addressed within the Preliminary Documentation. Where issues have been raised that are outside the scope of the Preliminary Documentation, a description of where they have been considered via other processes is provided.

On the 1<sup>st</sup> of May 2018, the NSW Government granted development approval for 71 of the 75 Bango Wind Farm turbines. Details can be found on the [NSW Department of Planning and Environment Major projects website](#).

This *Response to Submissions* is a supplementary document to accompany the Preliminary Documentation. For information, the Preliminary Documentation will be re-exhibited along with this *Response to Submissions* for the period from **Thursday 24<sup>th</sup> May – Thursday 7<sup>th</sup> June 2018**. A determination will subsequently be made by the Department of Energy and the Environment on the project approval status.

## Public Submissions Received

The Bango Wind Farm Preliminary Documentation (BWF PD), describing the impact and proposed mitigation measures for threatened species and communities and listed migratory species, was on display for public comment from Thursday 26th April to Thursday 10<sup>th</sup> May 2018. During the exhibition period, the following submissions were received:

ID	Date	From	Suburb	Relevant Concerns	Comment/Reference
PS01	28/04/18	J. Wardell	Berowra	None	Letter of support
PS02	01/05/18	M. Allen	Baulkham Hills	None	NA
PS03	03/05/18	M. Allen	Baulkham Hills	None	NA
PS04	08/05/18	M. Allen	Baulkham Hills	None	NA
PS05	08/05/18	A. Renwood	Yass	Superb Parrot	<a href="#">Superb Parrot.</a>
PS06	08/05/18	I & K Renwood	Yass	Superb Parrot	<a href="#">OEH Letter to IPCN.</a>
PS07	08/05/18	N. Renwood	Yass	Superb Parrot	<a href="#">Superb Parrot</a> and <a href="#">Grey Headed Flying Foxes.</a>
PS08	09/05/18	D & U Aroney	Laverstock	Superb Parrot	<a href="#">Superb Parrot</a> , <a href="#">OEH Letter to IPCN</a> and <a href="#">Swift Parrot.</a>
PS09	10/05/18	S. Hemsley	Boorowa	Superb Parrot, Golden Sun Moth and Box Gum Woodland	<a href="#">Superb Parrot</a> , <a href="#">GSM</a> , <a href="#">Offsets</a> and <a href="#">OEH Letter to IPCN.</a>
PS10	10/05/18	V. Smith	Yass	Superb Parrot	<a href="#">Superb Parrot</a> and <a href="#">OEH Letter to IPCN.</a>
PS11	10/05/18	R & A Winterflood	Laverstock	Superb Parrot	<a href="#">Superb Parrot</a> , <a href="#">OEH Letter to IPCN</a> and <a href="#">Swift Parrot.</a>
PS12	11/05/18	D & U Aroney	Laverstock		<a href="#">Other matters.</a>
PS13	09/05/18	M. Allen	Baulkham Hills	None	NA



## Superb Parrot

The risks imposed to the Superb Parrot by the Bango Wind Farm have been addressed in detail in the Preliminary Documentation.

Pages 58 to 73 of the report outline in detail the studies done to identify Superb Parrots and their habitat across the project site.

In summary, these extensive studies revealed:

- No superb parrots were observed flying at the rotor swept area (RSA) height. (See BWF PD pp58-60, pp83-84 and Annex A, Table A.1)
- All proposed wind turbine locations are at an altitude of 620m ASL or above, which is above the optimal altitudinal range – 350 to 550m ASL - of the Superb Parrot. (See BWF PD page 61 and figures 3.31 and 3.32)
- The vast majority of observed Superb Parrot activity was in the Lang's Creek cluster, which was subsequently removed from the development layout. (See BWF PD figure 3.26)

PS09 includes commentary around section 4.1.3.1 of the BWF PD, which states that there are eight primary hollow-bearing trees that must be removed. Compared to the primary hollows within 500m of the project, this does represent about 10% of the hollows within 500m of the project. However, the area within 500m of the project is arbitrary, and small compared to the distribution area of the Superb Parrot.

Following the same logic, the area within 500m of the project that contains 81 primary hollows is approximately 5,500 ha. If primary hollows are dispersed relatively consistently across the ~40,000,000 ha Superb Parrot distribution area (as found on the OEH website referenced in PS08), there would be approximately 590,000 hollows available, so the removal of 8 of these represents around 0.001 % of the total hollows available.

## Golden Sun Moth

The risks imposed to the Golden Sun Moth by the Bango Wind Farm have been addressed in detail in the Preliminary Documentation.

Pages 51 to 57 of the report outline in detail the studies done to identify the Golden Sun Moth and its habitat across the project site.

In summary, these extensive studies revealed:

- Grassland environments providing wide ranging habitat utility to the Golden Sun Moth from unsuitable grasslands to known and optimal grassland habitats. (See page 51-2 of the PD)
- Surveys counted 104 individual sightings in the surveyed area. (See page 51 of the PD)
- Estimated impact to habitat would be removal of 39.54ha of known and potential habitat, but noteworthy is that the proposed footprint does not remove whole areas of habitat, rather amounts to a relatively narrow access track through a grassland of substantially greater area than that removed. (See page 51 of the PD and figures 3.17 – 3.20)

PS09 references a cumulative impact of 100ha to Golden Sun Moth habitat by the Bango Wind Farm and the Rye Park Wind Farm, two projects separated by 20km. The relative significance of that clearing is likely low, given that (as presented on page 52 of the PD) the modelled native grassland extent within 10km of the Bango Wind Farm is nearly 31,000ha. The amount of native grasslands beyond that 10km area has not been analysed, nor the area of native grasslands surrounding the

footprint of the Rye Park Wind Farm, because the relative amount of Golden Sun Moth habitat clearing caused by the Bango Wind Farm within an area of 500m and of 10km of the Bango Wind Farm footprint is extremely small (1.59% and 0.001% respectively). (See page 83-4 and 51-52 of the PD)

The Golden Sun Moth faces has a very high conservation status of Critically Endangered not because of observed population declines or probability of extinction in the wild (no evidence supports those points (TSSC 2002)), rather because its geographic distribution has suffered significant decline from “agriculture and urban expansion over much of its original distribution” (TSSC 2002<sup>1</sup>). That is, the native natural grasslands on which the species relies have been substantially modified since European arrival in Australia. It is also significant to note that the grassland habitats the species relies upon are generally not well represented in the conservation reserve network (DoEE 2018<sup>2</sup>), thus remaining habitat is in private ownership and susceptible to land management decisions of those private landholders regarding grassland management.

The relative impacts of the Bango Wind Farm to the Golden Sun Moth are not large when considered in a local or regional setting (500m or 10km buffers around the Bango Wind Farm footprint) with substantial areas of habitat likely to remain adjacent to the footprint. Notwithstanding, Commonwealth policy will apply regarding offsets, which are discussed below and in the BWF PD (See section 6)

## Offsets

Section 6 of the BWF PD explains that offsets are required under the EPBC Act only where residual impacts, after EPA Act offsets are applied, are “significant”. It is likely that there will be no residual significant impacts of the Bango Wind Farm to MNES apart from the GSM.

Also under section 6 of the BWF PD is a description of the process for quantifying and obtaining these additional GSM offsets. The actual project impact will not be known until the final wind farm layout is determined, however it is known that the impact to GSM habitat will not exceed 39.54 ha.

As an aside, the project’s offset obligation required for NSW development consent is significant, and is clearly outlined in the Consent Conditions (found at:

<http://ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2018/02/bango-wind-farm/determination/bango-wind-farm--development-consent.pdf>).

These obligations ensure that the status of Superb Parrot habitat will improve once the wind farm is built and offset obligations are met, therefore meeting the objectives of the DEE National Recovery Plan for the Superb Parrot.

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<sup>1</sup> *Synemon plana* (Golden Sun Moth) – Advice to the Minister for the Environment and Heritage from the Threatened Species Scientific Committee (TSSC) on Amendments to the list of Threatened Species under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) Threatened Species Scientific Committee. Available from: <http://www.environment.gov.au/node/16501>

<sup>2</sup> Department of the Environment (2018). *Synemon plana* in Species Profile and Threats Database, Department of the Environment, Canberra. Available from: [http://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon\\_id=25234](http://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=25234)

## OEH Letter to IPCN

A letter was sent to the Independent Planning Commission NSW (IPCN) by the Office of Environment and Heritage, South-East Regional Office. Both the Proponent and the NSW Department of Planning and Environment responded to that letter, and following these exchanges, project approval was granted.

The letter from OEH and the subsequent responses, included as [Annexure A](#), can also be found at: <http://ipcn.nsw.gov.au/projects/2018/02/bango-wind-farm>.

## Other Matters

A number of the submissions, but PS12 in particular, raise issues that are not directly related to MNES, and that have been identified, investigated and addressed through the NSW Government Approval process. These are:

- Community consultation
- CWP Renewables company ownership
- Project justification
- Wind compared to other renewable energy sources
- Visual impacts
- Noise impacts
- Cumulative impacts of wind farms in the area

The table below indicates where these issues have been discussed, and subsequently accepted, through the NSW government approvals process.

Concern	Where addressed
Community consultation	<i>Environmental Impact Statement (EIS) Chapter 6, Appendices 5, 6 and 7, and Response to Submissions (RtS) Ch 3.6 and 4.6</i>
CWP Renewables company ownership	<i>EIS Ch. 2, Independent Planning Commission NSW</i>
Project justification	<i>EIS Ch. 4, RtS Ch. 4.4</i>
Wind compared to other renewable energy sources	<i>EIS Ch. 4, RtS Ch. 4.4</i>
Visual impacts	<i>EIS Ch. 8, RtS Ch. 4.8</i>
Noise impacts	<i>EIS Ch. 9, and RtS Ch. 3.9 &amp; 4.9</i>
Cumulative impacts of wind farms in the area	<i>Considered throughout the EIS</i>

## Grey Headed Flying Foxes

Although the Grey-headed Flying Fox appears on the EPBC Protected Matters Search Tool (PMST) for the area, the BioNet Atlas report shows no siting of the Grey-headed Flying Fox within 50 km of the proposed wind farm site (excerpt and weblink below).

[http://www.environment.nsw.gov.au/atlaspublicapp/ui\\_modules/atlas\\_/atlassearch.aspx](http://www.environment.nsw.gov.au/atlaspublicapp/ui_modules/atlas_/atlassearch.aspx)



The screenshot shows the BioNet Atlas search interface. At the top, there are logos for NSW Government, Environment & Heritage, and BioNet. Below the logos is a navigation bar with 'HOME', 'SPECIES SIGHTINGS SEARCH', and 'FLORA SURVEY'. The 'SPECIES SIGHTINGS SEARCH' tab is active. Below the navigation bar, a breadcrumb trail reads 'You are here: Home > Species sightings search results'. The main section is titled 'Search results' and includes a sub-header 'Which species or group?'. Below this are radio buttons for 'All entities', 'Animals', 'Plants', 'Fungi', 'Communities', 'Threats', 'Endangered populations', and 'Search for a species or group of species (e.g. birds)'. The 'Search for a species or group of species' option is selected. A search box contains the text 'Enter at least 3 letters and click Go' and a 'Go' button. Below the search box, it says 'Term selected: Grey-headed Flying-fox Common Name; Pteropus poliocephalus'. At the bottom, a message states 'No records found' and provides search criteria: 'Public Report of all Valid Records of Grey-headed Flying-fox (Species: Pteropus poliocephalus) in selected area [North: -34.26 West: 148.39 East: 149.39 South: -34.97] returned 0 records for 0 species. Report generated on 11/05/2018 11:23 AM.'

Additionally, this species was not sited during field surveys for the Bango Wind Farm EIS (*See Annex C of Appendix 12, the Ecological Assessment*).

For these reasons, the Grey-headed Flying Fox was not considered in the BWF PD, and the species is unlikely to be affected by the wind farm.

## Swift Parrot

Appendix 1 of the BWF PD, the original Referral and Decision, identified the Swift Parrot as having potential to occur in the project area (p27 of 56), but the species has not been recorded in the study area, in the study locality or identified in field surveys (p29 of 56).

Further, the BioNet Atlas report shows no siting of the Swift Parrot within 10 km of the wind farm site.

[http://www.environment.nsw.gov.au/atlaspublicapp/ui\\_modules/atlas\\_/atlassearch.aspx](http://www.environment.nsw.gov.au/atlaspublicapp/ui_modules/atlas_/atlassearch.aspx)

You are here: [Home](#) > Species sightings search results

## Search results

### Which species or group?

- ☐ All entities
 ☐ Animals
 ☐ Plants
 ☐ Fungi
 ☐ Communities
 ☐ Threats
 ☐ Endangered populations
 ☒ Search for a species or group of species (e.g. birds)

Search for term

Enter at least 3 letters and click Go

Go

Term selected: Swift Parrot Common Name; Lathamus discolor

### No records found

**Search criteria:** Public Report of all Valid Records of Swift Parrot (Species: Lathamus discolor) in selected area [North: -34.40 West: 148.64 East: 149.04 South: -34.86] returned 0 records for 0 species.  
Report generated on 11/05/2018 2:35 PM.

Therefore, it was not considered further in the BWF PD.

## Overall Response to Public Submissions

After a thorough investigation of all public submissions received, it appears that all concerns raised that are relevant to the EPBC Approval have already been considered throughout the development process and addressed within the Preliminary Documentation.



# Public Submissions

ID	From	Suburb	Page
PS01	J. Wardell	Berowra	7
PS02	M. Allen	Baulkham Hills	9
PS03	M. Allen	Baulkham Hills	10
PS04	M. Allen	Baulkham Hills	11
PS05	A. Renwood	Yass	12
PS06	I & K Renwood	Yass	13
PS07	N. Renwood	Yass	14
PS08	D & U Aroney	Laverstock	15
PS09	S. Hemsley	Boorowa	18
PS10	V. Smith	Yass	20
PS11	R & A Winterflood	Laverstock	21
PS12	D & U Aroney	Laverstock	22
PS13	M. Allen	Baulkham Hills	34

Direct Action



P.O. Box 101  
 Beacon 2081  
 28th April '18

Dear Sir/Madam,

I read with interest your notice in the Public Notices "Bunge Wind Farm, NSW - Have your say" S.M.H. April 26th 2018.

As you can see I am very much in favour of Wind Turbines, and the establishment of Wind Farms - the only way Australia can help establish the renewable energy industry, we all know that coal and fossil fuels have to go if we ever have a hope of reversing the destruction of climate change, and global warming - really does seemer persist?

Yes, there will be risk to migratory  
Birds, but I doubt any creature that  
lives in at Risk - I have seen other Wind  
Farm where cattle are peacefully graz-  
ing, in no way disturbed by the  
noise as the Blades rotate.

As for human health, the sound  
didn't bother me - but I can under-  
stand complaints, particularly when  
these turbines are positioned on  
farms land, and so they don't receive  
any financial return. As for appearance  
I think they are incredibly beautiful,  
several in fact - we have to become  
used to Wind turbines if we hope  
to generate Renewable Power, like large  
forests of solar panels - if we  
wish to save "Mother Earth" from ever  
cooking, which is the direction we are  
heading now! Why are our Summers  
warming every year, and Oceans too?

Yes I am very much in favour of  
the "Banga Wind Farm", and hope it receives  
approval to go ahead - Australia needs  
many more Wind and Solar Farms if we  
hope to control Climate Change. Good Luck  
Sincerely, J. Warrell

1.5.2018



Matthew Allen  
22 Linton St  
Baulkham Hills  
2153

Bango Wind Farm  
PO Box 1708 New Castle  
NSW 2300

Dear Sir/Madam

Bango Wind Farm

NSW, Have your Say.

While I am pro renewables  
Visual pollution of Towers, is a blight on landscape.  
A law of Thermodynamics states energy cannot be  
created or destroyed. Only changes form, Designing a renewable  
reactor, making use of magnetic field around planet.  
Spin a turbine creates friction, friction becomes heat,  
heat disperses magnetism.

Kind Regards

Matthew Allen

3.5.2018



Matthew Allen  
22 Linton St  
Baulkham Hills  
2153

Bango Wind Farm  
PO Box 1708 Newcastle  
NSW 2300

Dear Sir/Madam

Bango Wind Farm

NSW, have your say.

Previous correspondence 1.5.2018,  
Designing a renewable reactor. Collecting electricity from  
dispersed magnetic fields. Use of a Solar Hydrogen fuel  
cell. Spin turbines at extreme RPM, due to high heat stress.  
Construct turbines in heavy metals gold, palladium  
heat resistance powders, rare earths. Go into partnerships  
with junior resource companies. In exchange a share  
of royalties in power grid.

Kind Regards

Matthew Allen



8.5.2018



Matthew Allen  
22 Linton St  
Baulkham Hills  
2153

General Manager  
Bango Wind Farm  
PO Box 1708 Newcastle  
NSW 2300

Dear Sir/Madam

Re Bango Wind

From have your say, previous correspondence 1.5 - 3.5 2018.  
The main objective, in any Commercial venture is cashflow.  
Using Real estate for maximum return. Wind Farms  
while serving an alternative renewable. Many issues  
concerning environment, Farm fauna, visible pollution.  
The Federal Government has allocated Fifty million dollars.  
to develop Australia's first Space agency. Australia  
being blessed with many resources. all crucial for a  
fledgling space program. Concentrating efforts constructing  
a reusable space vehicle. Run entirely on kinetic  
energy affordable space travel for the masses

Kind Regards

Matthew Allen

## PS05

Wind turbines kill between 214,000 and 368,000 birds annually making it the most threatening form of green energy. Birds are constantly getting killed, and one of the main causes of their death is because of wind farms which are constantly harming and killing thousands of threatened and endangered bird species because birds are flying into them. The Superb Parrot is an endangered distinctive large, green parrot which lives in New South Wales and Victoria and is under major threat from windfarms as it is killing large numbers of the parrots. The Superb Parrot can be found in Yass which is where our family's farm is. I have seen the parrots flying around and they are honestly one of the most beautiful birds I have ever seen and I would hate to see them become extinct because of wind turbines.

So, before you put in these bird death traps please think about that amount of innocent animals you are killing, including the Superb Parrot,

Thank you,  
Alex



PS06



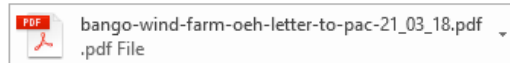
Tue 8/05/2018 7:30 PM

Kate.renwood <kate.renwood@gmail.com>

Submission re Commonwealth govt Dept of Environment and Energy

To: Bango Info; EPBC.Referrals@environment.gov.au

i You forwarded this message on 9/05/2018 8:35 AM.



Dear Sir/ Madam

This email is to re-iterate our concerns regarding your complete lack of consideration for Australian endangered species and especially the superb parrot which is the emblem of Boorowa. We live very close to the proposed wind farms and the superb parrots visit us often.

The Bango Wind Farm has completely dismissed the requirements of the NSW Office of Environment and Heritage to protect our endangered species. This report was written on 21 March 2018 and submitted by Michael Saxon, Director South East Regional Operating Division of the OEH to the Independent Planning Commission. The Commission, based on letters submitted by the Bango Wind Farm and the Department of Planning completely ignored this important and valid report from the OEH. This report is attached to our email submission.

I request the Commonwealth Department of Environment and Energy to consult directly with the OEH and to implement all recommendations in their report to protect our endangered species.

The Bango Wind Farm continually argue they have deleted turbines in the Langs Creek Cluster to save the parrots. This is NOT enough according to the OEH report. There are also cumulative impacts from other approved wind farms in the area. All the testing recommended by the OEH report and the deletion of turbines (which the OEH states is the safest way to protect the species) need to be implemented.

We also note that your newspaper article was in the Sydney Morning Herald on 30 April, but your exhibition was from 26<sup>th</sup> April. This is interesting considering the Independent Planning Commission did not approve the Bango Wind Farm until 1 May. The public needs more time to be consulted and to give their say.

Regards,


Ian and Kate Renwood

## PS07



Tue 8/05/2018 7:30 PM

renwonic2023 - N.Renwood <renwonic2023@student.cranbrook.nsw.edu.au>

To  Bango Info

Cc  EPBC.Referrals@environment.gov.au

### Superb Parrot Letter to Government

Please government listen to my parents these windfarms are not going to do anything apart from killing the beautiful superb parrot. I'm a twelve-year-old boy who absolutely adores the wildlife I do not want to see another beautiful species to die out. Waking up at my farm every morning I look outside my window and see these amazing birds fly around which are already endangered I just look at them like wow these things are beautiful I really don't want them to go extinct think of all the other animals that have already gone extinct the thylacine, dodo that's just a few Imagine if the superb parrot is in that area it won't be if you stop these horrible windfarms from making these magnificent birds fly into the turbines and die. don't worry it's not too late for you to say no.

These wind turbines also affect the bird's migration which stops it from breeding.

I have been living at my farm for 6 years now and I have been studying these birds if these wind farms go up this will ruin my time at my farm watching these birds.

Read these facts

- Wind turbines kill between 214,000 and 368,000 birds a year! – national geographic
- It also kills grey headed flying foxes which are vulnerable which is the category before endangered this animal also lives at our farm

Yours Nicholas Renwood

Tangmangaroo Road Yass

May 09, 2018

To Whom It May Concern

We are writing to express our concerns regarding the preservation of critical habitats and the likely further depletion of both the Swift & Superb Parrot endangered species. Latest observations of these species conclude that the numbers appears to be declining, in particular in the Yass and Boorowa area (refer to *"Keeping Up with the Superb parrot- Have your Say"* NSW Office of Environment and Heritage website).

The below map illustrates the distribution/habitats of the Superb Parrot, as identified under the "Saving our Species Program" as part of the Landscape Management Plan it has been assigned (refer NSW Office of Environment and Heritage website). The approved Bango Wind Farm along with the approved Rye Park and proposed Coppabella Wind Farm have been superimposed on the map to illustrate the significant impact the extent and locations of these developments will have on the habitat corridor of this endangered species;

#### Species sightings and management sites across NSW

The map below displays the species' distribution in NSW, based upon the species' geographic range, habitat distribution or area of occupancy (to as high a resolution as available data allow, using a range of data sources).

Information about the species' habitat and ecology is available [here](#).

The map may also display one or more management sites where management of important populations is underway. More information is available in the tables below.



We cannot understand the concept of supporting a renewable energy source such as the Bango windfarm, which purportedly is going to help the environment, when there is clear documented evidence that in fact it is guaranteed to do the complete opposite, attributing to the further decline and likely extinction of two of Australia's iconic parrot species.



May 09, 2018

As the turbines are located in the heart of the Superb Parrots breeding ground, no mitigation measures will be adequate. This is strongly supported by researchers and the Department of Environment & Energy (DEE) itself.

The wind farm developer, CWP's 'Preliminary Documentation' fails to adequately address those aspects raised by the Office of Environment and Heritage (ref DOC18/123896 D502-18 - attached), nor those outlined in the DEE's National Recovery Plans for both the Superb and Swift Parrots – extract below (*p13 of DEE National Recovery Plan for the Superb Parrot*)

**Objective 3: Develop and implement threat abatement strategies.**

*Performance criterion:* The decline in abundance is reversed and there is an overall increase in population size.

Action 3.1: Develop and implement a Superb Parrot 'Habitat Retention and Enhancement' policy which uses all administrative avenues (e.g. native vegetation retention Acts) to protect box-gum woodland from clearing and degradation within the range of the Superb Parrot, with special emphasis on woodlands within 10 km of colonies. This policy must enshrine a net gain for Superb Parrots from any proposed development.

Action 3.2: Identify and protect all breeding season foraging habitat within 20 km of colonies.

Action 3.3: Identify and secure the management of high priority habitat for Superb Parrots on private land through voluntary cooperative agreements under the relevant legislation.

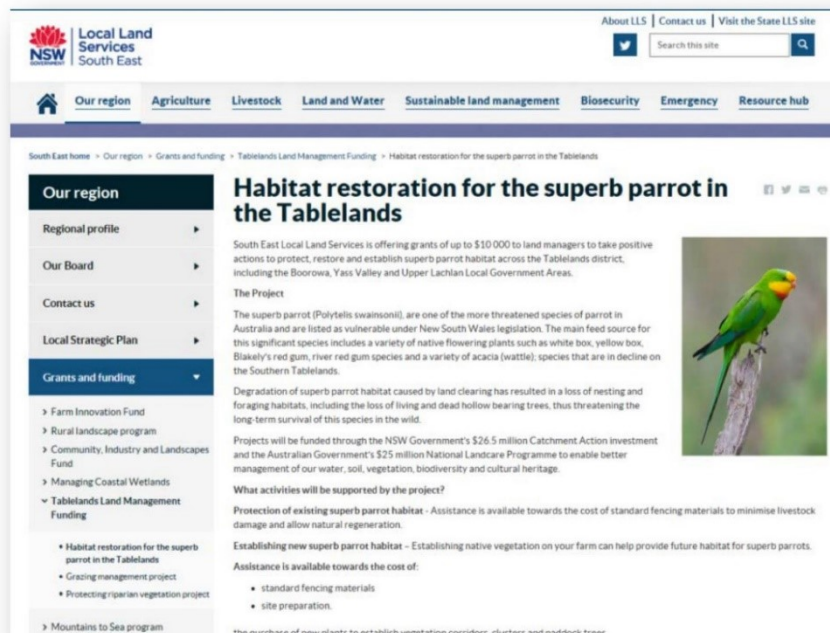
Action 3.4: Use all available legal instruments, together with education, assistance and incentives, to protect known and potential nest sites on private land.

Action 3.5: Develop a set of guidelines for land managers to improve the management of remnant woodlands used by Superb Parrots in irrigation districts. These guidelines should address issues of supply of water, development of surface drains, and development of irrigation using deep bores.

As referenced in the recovery plan, given the vast area to be preserved and protected, as there are *"several elements of the Superb Parrot's biology make it particularly vulnerable to a range of threats ...require foraging habitats within 10km of nest sites, and requires vegetated corridors to move between breeding and foraging habitat. Degradation and destruction of foraging and movement corridors are key factors in its decline"* it would be virtually impossible for the proponent of a windfarm to guarantee nil impact or attempt to define what an acceptable level of impact may be.

Furthermore, it seems to be in complete opposition and in competition to the efforts and actions made by NSW Government Local Land Services where farmers in our district have been issued grants in 2017/18 of \$10,000 per farm in order to preserve and restore the Superb Parrot habitats.

May 09, 2018



The screenshot shows the Local Land Services South East website. The header includes the NSW logo, 'Local Land Services South East', and navigation links: 'About LLS', 'Contact us', and 'Visit the State LLS site'. A search bar is also present. The main navigation menu includes 'Our region', 'Agriculture', 'Livestock', 'Land and Water', 'Sustainable land management', 'Biosecurity', 'Emergency', and 'Resource hub'. The breadcrumb trail reads: 'South East home > Our region > Grants and funding > Tablelands Land Management Funding > Habitat restoration for the superb parrot in the Tablelands'.

**Our region**

- Regional profile
- Our Board
- Contact us
- Local Strategic Plan
- Grants and funding**
  - Farm Innovation Fund
  - Rural landscape program
  - Community, Industry and Landscapes Fund
  - Managing Coastal Wetlands
  - Tablelands Land Management Funding**
    - Habitat restoration for the superb parrot in the Tablelands
    - Grazing management project
    - Protecting riparian vegetation project
  - Mountains to Sea program

**Habitat restoration for the superb parrot in the Tablelands**

South East Local Land Services is offering grants of up to \$10 000 to land managers to take positive actions to protect, restore and establish superb parrot habitat across the Tablelands district, including the Boorowa, Yass Valley and Upper Lachlan Local Government Areas.

**The Project**

The superb parrot (*Polytelis swainsonii*), are one of the more threatened species of parrot in Australia and are listed as vulnerable under New South Wales legislation. The main feed source for this significant species includes a variety of native flowering plants such as white box, yellow box, Blakely's red gum, river red gum species and a variety of acacia (wattle); species that are in decline on the Southern Tablelands.

Degradation of superb parrot habitat caused by land clearing has resulted in a loss of nesting and foraging habitats, including the loss of living and dead hollow bearing trees, thus threatening the long-term survival of this species in the wild.

Projects will be funded through the NSW Government's \$26.5 million Catchment Action Investment and the Australian Government's \$25 million National Landscape Programme to enable better management of our water, soil, vegetation, biodiversity and cultural heritage.

**What activities will be supported by the project?**


Protection of existing superb parrot habitat - Assistance is available towards the cost of standard fencing materials to minimise livestock damage and allow natural regeneration.

Establishing new superb parrot habitat - Establishing native vegetation on your farm can help provide future habitat for superb parrots.

**Assistance is available towards the cost of:**

- standard fencing materials
- site preparation,

the purchase of new plants to establish vegetation corridors, clusters and paddock trees



We request the Department of Environment & Energy liaise with the Office of Environment & Heritage, and in addition, with Drs Damon Oliver and Laura Rayner as their research supports either the outright rejection of the proposed windfarm or at least a significant reduction of turbines in the most critical areas in order to protect our endangered and threatened species.

Regards,

Don & Ulrika Aroney  
Laverstock, NSW

Bango Wind Farm  
Development Manager  
PO Box 1708  
Newcastle NSW 2300

Susan Hemsley  
501 Harrys Creek Road  
Boorowa NSW 2586  
(Postal address: PO Box 1  
Canterbury NSW 2193)

9 May 2018

Dear Bango Wind Farm Development Manager and Department of Environment and Energy

Re: Proposed Development of Bango Wind Farm, Southern Tablelands, New South Wales, (EPBC Ref: 2013/6810).

Please find below some comments on Preliminary Documentation in regard to Matters of National Environmental Significance currently on exhibition for the Bango Wind Farm project (2013/6810).

The threatened species/communities most likely to be adversely affected by this project are:

- White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland (critically endangered)
- Golden Sun Moth (*Synemon plana*) (critically endangered)
- Superb Parrot (*Polytelis swainsonii*) (vulnerable)

The NSW Office of Environment and Heritage (submission to the NSW Planning Assessment Commission 21/03/2018) has expressed concerns regarding the accuracy of vegetation mapping and calculation of offsets, the proximity of hollow bearing trees to some turbines considering the site contains core breeding habitat of the Superb Parrot and the possibility of active nest hollows being used by Superb Parrots being removed. They stated a number of recommendations to mitigate the issues relating to hollows that do not seem to have been incorporated in the documentation. These are summarised below

In their submission of 21/03/2018, OEH:

- Expressed concern about turbines located within 100m of hollow-bearing trees in relation to potential nest sites for Superb Parrots and about turbines located within and along edges of intact woodland and forest patches
- Stated that the maps provided indicate numerous hollow-bearing trees within Box-Gum woodland in the development footprint
- Recommended a distance of at least 50 m from blade tip to canopy of hollow-bearing trees, which will likely translate to a distance of 75-100m from the tower to the tree and found that at least 10 turbines in layout 1 appear to be within this distance
- Recommended all hollow bearing trees in the development footprint be assessed during Superb Parrot breeding season (Sept-Jan) and if an active nest hollow is found, the tree cannot be cleared
- Argued that the use of artificial nest boxes is not an appropriate alternative
- Recommended that if hollow bearing trees are to be removed they must be offset by protecting and enhancing other vegetation with similar density of hollow bearing trees
- Recommended that potential nesting habitat not to be cleared during the breeding season to avoid deaths of nesting birds and young.

OEH also provided a list of specific turbines that they believe should be micro-sited or deleted because of concerns about effects on bird and bat strike and fragmentation of habitat. They also recommended that all moderate to good condition Box-Gum Woodland is retained

The preliminary documentation indicates that 10% of hollow-bearing trees in the 500m buffer will be removed (4.1.3.1. 'The latest design footprint, that includes all Project infrastructure, intersects with eight primary hollow bearing trees that will have to be removed. This loss will have a negligible impact driving competition for hollows for the species given the recorded 81 primary hollows in the 500m buffer'). As each tree may presumably have more than one hollow, this could represent much more than the 10% of hollows being removed – I do not believe that this represents only a 'negligible impact'.

Approximately 40Ha of Golden Sun Moth will be affected by the proposed project, more than 100Ha cumulatively with the Rye park Wind Farm. It is acknowledged in the documentation that this species will be significantly impacted by the project but the discussion of proposed offsets (p 92) is vague and offers no guarantees that suitable offsets will be secured.

Given the potential impacts to these threatened species/communities I urge the DEE to ensure that all concerns regarding vegetation mapping methodology and offset calculation raised by NSW OEH be investigated and addressed as needed and that their recommendations regarding preservation and buffering of tree hollows be implemented. Overall, I am concerned that the footprint of the project is large in the context of the habitat requirements of these threatened species and that offset targets may not be able to be met.

Yours sincerely

Susan Hemsley  
(0433169366)

PS10



Thu 10/05/2018 2:15 PM

Veronica Smith <montaltasmith@gmail.com>

Bango Windfarm Public Comment

To [EPBC.Referrals@environment.gov.au](mailto:EPBC.Referrals@environment.gov.au); [Bango Info](#)

*Dear Sir/Madam.*

*I write to express my concern in relation to the proposed Bango Windfarm and the impact it will have on our threatened native birds. The draft submission is at odds with the Australian Government's Threatened Species Strategy, and in particular the "20 Birds by 2020" plan which targets protecting our very own Swift Parrot as one of the priority species to protect.*

*As the main threats to the species are habitat loss and collision mortality, the Department of Environment and Energy's own action plan states it will be spending \$3m dollars for projects that support recovery of the parrot, along with 13 projects through the "20 million Tree Programme" which are aimed at restoring its habitat. There is no acknowledgement in the Preliminary documentation addressing neither these issues nor the associated initiatives.*

*From knowing and reading about the migratory nature of these parrots in this area, along with the other endangered Superb Parrots, I could not see how any windfarm can be justified, irrespective of what the wind company says they will do to protect these precious birds. As the NSW DP&E identified, there are already 11 windfarms within a 60 km radius (4 operational, 6 approved, 1 in pipeline), 549 turbines in total. Approving one more windfarm with over 70 turbines is signing the Parrots extinction notice!*

*Being born on the land, and having worked the land all of my long life, I understand the delicate nature and important role each species has in maintaining a good 'balance'. The Office of Environment & Heritage understands this sensitivity and this is reflected in their recent letter to NSW IPAC (it's more than just the parrots – it's the overall effect it will have on flora and fauna - and how this will affect what we do on the farm).*

*On the basis of the information provided in the draft submission and lack of consideration to the Australian Governments National Strategies to adequately protect these threatened species and others, there are clearly unacceptable cumulative impacts and the project should not be allowed to proceed.*

*Yours,*

*V.Smith*



PS11



Thu 10/05/2018 5:12 PM

Robin Winterflood <rbwinterflood@gmail.com>

Bango Windfarm Opposition

To Bango Info; EPBC.Referrals@environment.gov.au



Dear Sir/madam

I am writing to you today to express my concern and opposition to the proposed Bango Windfarm which has recently been proposed and approved by the NSW Department of Planning and Environment and the NSW Independent Planning Commission.

This windfarm has been approved despite serious concerns being raised by the NSW Office of Environment and Heritage.

I believe strongly that the project will seriously impact the landscape and environment around Kangiara and Mt Buffalo in the following areas:

1: The destruction of habitat for specific species of birds, bats, insects and amphibians- all of which are listed as vulnerable.

Four bird species have been listed as vulnerable by the Commonwealth Department of Environment and NSW Office of Environment & Heritage vulnerable. These are

\*The Superb Parrot "National Recovery Plan for the Superb Parrot" ...

<http://www.environment.gov.au/system/files/resources/4d6611e8-0965-48f1-940d-1c32ec0e2b88/files/polytelis-swainsonii-recovery-plan.pdf>

\*Swift Parrot

"Australian Government's Threatened Species Strategy" ... "20 Birds by 2020"

<http://www.environment.gov.au/biodiversity/threatened/species/20-birds-by-2020/swift-parrot>

...& it cites "habitat loss & collision mortality" as 2 of 3 main threats

\*Turquoise Parrot <http://www.environment.nsw.gov.au/threatenedspeciesapp/profile.aspx?id=10555>

Spotted Harrier:

<http://www.environment.nsw.gov.au/threatenedspeciesapp/profile.aspx?id=10555>

Wedge-Tail Eagle: The Wedge-tailed eagle is not listed as endangered but it is at high risk due blade strike. It is well documented that eagles around the world are seriously under threat from wind turbines. [www.savetheeaglesinternational.org](http://www.savetheeaglesinternational.org)

There are a number of turbines in proximity to Wedge-Tailed Eagles nests. One of the findings was that CWP Renewables was given free rein to destroy an active Wedged Tailed Eagle's nest, tree and all and replace it with tower B1, by the New South Wales government. A 200 metre tipped tower. That to me is environmental vandalism.

All of the above species are vulnerable due to the clearing of the country in and around Yass by previous generations. Farmers now understand and work with the environment and are working to re-vegetate and improve the environment for both their own farming needs and the natural environment.

The Bango Windfarm has completely ignored the requirements of the NSW Office of Environment and Heritage to protect our endangered species. I have attached a report by Michael Saxon Director of the South East regional Operating Division to the Independent Planning Commission.

This project will see over 200 hectares of old-growth trees wantonly destroyed to facilitate this project. Isn't it time we left this area alone to continue to regenerate and allow many of the threatened and vulnerable species to breed and flourish safely for the benefit of future generations?

The Bango Wind Farm continually argue that they have deleted turbines in the Langs Creek Cluster to save the parrots. This is NOT enough according to the OEH report. There are also cumulative impacts from other approved wind farms in the area. All the testing recommended by the OEH report and the deletion of turbines (which the OEH states is the safest way to protect the species) need to be implemented.

I request the Commonwealth Department of Environment and Energy to please consult directly with the NSW OEH on this matter and implement all the recommendations in their report to protect our endangered and threatened species.

I also note that your newspaper article was in the Sydney Morning Herald on 30 April, but your exhibition was from 26<sup>th</sup> April. This is interesting considering the Independent Planning Commission did not approve the Bango Wind Farm until 1 May. This has not given the public enough time to have their say. I also find the placement of the information very hard to find in the Yass library.

You do not actively and fairly consult with the Community.

Yours sincerely

Robin & Andy Winterflood

D&U Aroney 'LETONA'  
LAVERSTOCK RD  
YASS NSW 2582

10 May 2018

To the Minister,  
Australian Government  
Department of the Environment & Energy

cc: Jamie Machin – Senior Assessment Officer, DEE.

**Re: Bango Wind Farm (2013/6810)**  
**LETTER OF OBJECTION**

Dear Minister,

In addition to our earlier submission outlining our grave concerns with the proposed project due to the detrimental impact on the endangered and threatened species of both the Superb and Swift Parrots, we wish to further outline our objection to the project and for the Minister to consider the greater social and economic impacts that have not been adequately addressed in the Preliminary Documentation issued by CWP.

We are the landowners of "Letona", a mixed farming enterprise situated 20 km North of the Yass township, we are within 2.5km of the proposed Bango Windfarm, sandwiched between Kangiara and Mt Buffalo clusters, and we are vehemently opposed to such a development within such close proximity to our residence and in the district as a whole.

Our key issues relate to the failure of the proponent to adequately address concerns of the broader community and flora and fauna as a whole. The primary economic and social issues include:

- Impact to the habitat and mortality rates of Superb & Swift Parrots (addressed in separate correspondence dated 10.05.18 - attached)
- Lack of consultation and consideration to community input,
- Questionable ownership, control and overall project risk
- The justification for development (fails as a truly 'sustainable' development across financial, social and ecological measures),
- Lack of evaluation of alternate renewable sources such as solar
- Massive impact on visual amenity (as acknowledged by the Independent O'Hanlon report)
- Constant noise and vibration impact – both audible, infrasound
- Changes to the landscape and land use from rural to industrial due to the proliferation and cumulative impact of windfarms being approved/considered for approval in the district

Rural communities, including ours, continually battle the challenges which threaten their livelihoods by matters which are typically outside of their control; climate (bush fires, flooding and drought) supply/demand markets, plagues and the economy. More recently highlighted through significant mental health issues which are widespread in the agricultural sector. Our communities rely heavily on each other to work together in order to 'share the load' when adversity presents itself. Therefore, there should be unanimity on those matters where there is in fact a choice. As the Australian Government, the Department

and the developer are well aware, the proposed development and similar ones have deeply divided the community and neighbours alike.

Whilst renewable energy is definitely one of the solutions to combat climate change it is not acceptable to cause more damage to residents/communities the environment than it is claiming to protect. Australia has vast, un-inhabited space which should be utilised to full effect. Wind farms situated in more densely populated parts of the world, such as Europe, are being scrutinised as people are becoming increasingly aware of the impacts the turbines are having on their lives and the disparate financial contributions required to keep them operating. Wind farms are now more commonly constructed off-shore, and their longer term viability is under review especially when compared to the advances in solar technologies alone.

For the development to be truly "sustainable", the fundamental precepts addressing the needs of the majority of people (social), the environment (flora & fauna) and financial criteria must be addressed in full – we believe the development falls well short of these critical elements under the EPBC Act.

### **SOCIAL ISSUE: LACK OF CONSULTATION**

The project location, scale and type were decided at the outset **without** broad community consultation. Instead of the proponent seeking input of all residences in the area at the earliest planning stage, they managed to secure a few hosts (by providing substantial financial incentive to act as hosts) and move the proposal along strategically in silence – evidenced by very strict legal confidentiality obligations (see extract of host agreement below).

13. CONFIDENTIALITY
This agreement, and all information exchanged between the parties under or in connection with this agreement or during negotiations is confidential to them and may not be disclosed to any person at any time except:
(a) to employees, legal advisers, auditors, financiers, or other consultants of the party or its related bodies corporate requiring the information for the purposes of this agreement or implementing this agreement; or
(b) if required by law; or
(c) if strictly and necessarily required in connection with legal proceedings related to this agreement.

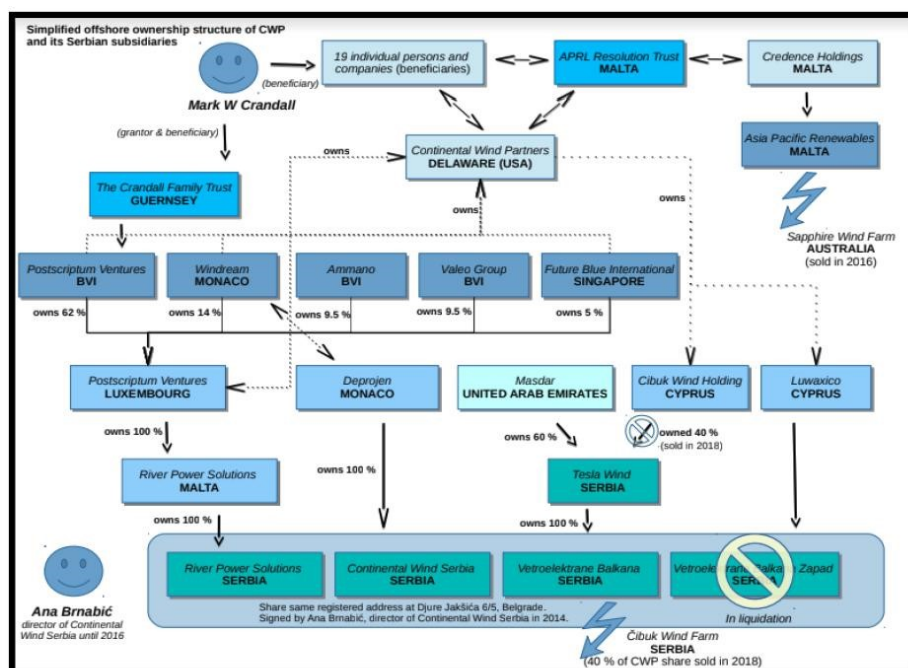
Once we made it clear we were not supportive of the proposal, contact and any form of consultation ceased – despite the NSW Department of Planning & Environment (NSWDP&E) issuing supplementary SEARs to specifically address this issue in August 2011. The NSW Director General stated the proponent *must* consult with the community in preparation of the EIS and for the proponent to outline *how* they have *ADDRESSED* issues raised – yet nothing was or has been adequately done.

### **ECONOMIC ISSUE: OWNERSHIP, CONTROL AND OVERALL PROJECT RISK**

By analysing the ownership structure of CWP since the original application was made in 2011, one has to query the real motivation, methods, justification and more importantly the viability of the project overall. Refer to diagrammatic representation of the ownership structure of CWP below (extract of article "Who

*Taxes the Wind? How the Serbian Prime Minister's former company was part of an offshore network investing in renewable energy in Europe and Australia" – March 2018)*

Whilst the project is being purported to be in the interests of the community, NSW and the Nation overall, it appears to be nothing more than an elaborate tax avoidance scheme and potential money laundering venture set to use both private and government subsidies for offshore unscrupulous investors.



According to L Burke Files (international investigative firm specialising in asset recovery, due diligence, anti-money laundering and intellectual property matters) the purpose of such an elaborate trust structure such as the CWP structure above could be to liquidate assets for the beneficiaries and best manage tax liability. He states:

*"An irrevocable trust creates a structure to hold and manage assets that is exempt from legal proceeds of either the grantor, grantee or the beneficiaries. Under most circumstances, the assets are out of the reach of any creditors," he said, and added that the ultimate control of the assets of the trust could be very remote from the actual trust. This is a feature that can be "used to obscure or confuse both ultimate beneficial ownership and control".*

Alex Cobham, chief executive of Tax Justice Network, UK based international advocacy group in the area of international tax avoidance and evasion, said in relation to CWP ...

*"This is a deeply worrying story of financial secrecy and the dangerous mingling of public and private interests. It confirms the importance of key transparency policies, in order to protect the public from the risks of corruption and tax abuse. It is crucial that we have public registers of the ultimate beneficial*

ownership of companies and of trusts and foundations. Such a measure, now required in the EU through the revised Anti Money Laundering Directive, is the new international standard."

"This case makes clear that all public contracts must be in the public domain," he added. "There can be no good reason to prevent the public seeing how their own money is being spent by their elected representatives – and that logic extends equally to subsidies and tax incentives. The importance of incentives for the global **switch to renewable energy makes this an industry of particular concern, likely to attract unscrupulous operators with no interest in sustainable development.**"

As this project is being assessed with National interests at risk (especially endangered parrot species) the Department of Environment & Energy (DEE) have a duty to protect the Australian public, the hosts (farmers) and the Yass Community by ensuring the project does in fact pass more than just the "sniff" test. There must be a well-documented evaluation with full disclosure to the public to demonstrate that the company is bona fide and the project is actually sustainable to meet Federal economic thresholds. Proper due diligence and transparency is required.

The Minister, if he somehow satisfies himself of all the issues/objections and approves the project, he should also be satisfied that there is a clear "exit strategy" that is simple, well defined and where control/responsibility is returned to the Nation, should the existing complex web of ownership and funding come apart.

#### **SOCIAL & ECONOMIC ISSUES: JUSTIFICATION OF DEVELOPMENT**

The following section uses the NSW SEARs (Environmental Assessment Requirements) as a basis to outline our economic concerns of the proposal.

The SEARs outlined for the DA application, General Issue #2, required the proponent to outline their "Justification of Development – based on ecological sustainability ...and strategic assessment of need" – **this remains incomplete.** Ecological sustainability as defined by the "International Institute of Sustainable Development" with respect to "sustainable electricity/energy" is as follows:

***"To be sustainable, electricity systems must recover capital and operating costs, invest for the future, provide reliable electricity and meet environmental and social objectives."***

Evaluating the proposal to the specifics of the NSW SEAR's we comment as follows:

<b><i>"Strategic assessment of need for..."</i></b>	<b>Comment</b>
<b>NSW</b>	<p><b>Proposed development fails to meet NSW DP&amp;E Priorities for NSW.</b></p> <p>The districts of Yass, Rye Park and Boorowa are steeped in pastoral history and world renowned for its fine wool production, and needless to say, it's stunning rural landscape. The backyard and inspiration for Australia's most famous writer &amp; poet Banjo Paterson. Consideration of such a project would represent a failure of the planning instruments to protect the district and similarly contradicts the NSW Department of Planning's "Priorities for NSW", which include:</p> <ul style="list-style-type: none"> <li>- "sustainable growth in the <b>right locations</b>"</li> <li>- "<b>Improved ...community</b> confidence"</li> <li>- "Effective management of natural, environmental and cultural resources and</li> </ul>



	<p>values"</p> <p>- "...pleasant neighbourhoods which <b>reflect community needs and aspirations</b>"</p> <p>This aspect has been ignored by NSW DP&amp;E and should be held in highest regard as a National issue by DEE in order to preserve the landscape which has provided the inspiration for Banjo Paterson's greatest works.</p> <p><b>Support is not sufficient to warrant the development:</b></p> <p>Section 5 NSWDP&amp;E SDD Report, "Consultation", references that the NSWDP&amp;E received 101 submissions, including 50 objections, which would seem to indicate that the community was split ~57% object / 43% support. However, the following statistics can be derived from DPEs website which greatly contradicts this statement;</p> <ul style="list-style-type: none"> <li>• 93 individual submissions</li> <li>• 60 objections</li> <li>• Out of the 33 supporters; <ul style="list-style-type: none"> <li>○ 17 are nowhere near local, ie Southern Highlands, Sydney, ACT</li> <li>○ 7 are hosts</li> <li>○ 3 are from the same person/property</li> <li>○ Weighted result - 7 supporters</li> </ul> </li> <li>• Similarly, if you disregard the objections from non-local people and submissions from the same property – weighted result is 42 objectors</li> <li>• Actual statistics – <b>86% of community are against the Bango Windfarm</b></li> </ul> <p>The SEARs themselves identify that the "<i>...suitability of the development must be in the public interest</i>". If this is the case, then surely the decision should be weighted heavily towards the 'vote of the people' and their sentiment. As stated above over 86% of respondents have objected to the development.</p> <p><b>Lack of local re-investment / benefits:</b></p> <p>The provision of local labour and therefore benefits is negligible. The turbines themselves will be manufactured and pre-assembled overseas and assembled by specialist crews on a "fly-in fly-out" basis (as with mining projects).</p> <p>There are very few local resources with the requisite skills or competence that could be employed on such high risk works under the Health &amp; Safety Act. Similarly, the large scale plant and equipment to erect such towers (such as large mobile cranes capable of reaching such heights and loads) requires again specialist equipment which must be temporarily imported to the region.</p> <p>As with most modern turbines the monitoring and operations will be conducted remotely, and maintenance will again be on an as needs basis by "fly-in fly-out" specialist contractors, providing very little benefit to local residents or businesses in the district. The DP&amp;E's Report identifies "<i>up to 5 persons may be employed</i>" which is offensive for this to be used as a contributing factor to support the development.</p> <p>All the steel required for the construction (ie the turbine itself) along with the associated generators and control equipment are manufactured overseas and imported. Nil benefit to Australian economy.</p>
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	<p><b>Land values will decrease:</b></p> <p>It is evident that land values will drop significantly in the district as a result of the development. This is a massive social and economic impact on the community and district overall. Reduction in land values places even greater stress on the wellbeing and mental health of the community.</p> <p>Independent land valuations should be completed and a model of compensation be proposed should the development be approved.</p> <p><b>Yass Valley Saturation:</b></p> <p>As identified in Section 2.1 of the NSWDP&amp;E SDD Report, there is a potential saturation of windfarms in the district. As stated in the report: eleven = four operating, six already approved, and an additional one proposed all within 60kms of the site. Nearly 550 turbines in total. The NSWDP&amp;E acknowledges the growing concerns of the cumulative audible and visual impact these will have on the broader landscape, but fails to adequately assess the impact for Bango itself or the cumulative effect of those surrounding.</p>
<b>Nationally</b>	<p>Support should be for greater innovation and, if anything, for solar energy where there is significantly less impact on flora, fauna and people's amenity and where the energy generation is more <b>predictable and constant</b>.</p> <p>Recent research by Green Energy Markets confirmed in Dec 2017 that the Renewables Energy Target (RET) has already been met by existing and current projects under construction. Those approved and in the pipeline to be built will provide more than 50 per cent of Australia's energy needs, which is significantly higher than the nominated 42% total generation identified by the Finkel Review of Energy, hence current Federal Government's focus on "National Energy <i>Guarantee</i> Policy".</p> <p>The current issues being faced by South Australia is a current, relevant and stark reminder for what decision makers should avoid. The DEE needs to acknowledge what is happening at a macro level and where the real opportunity for investment and National/state significant developments ought to be – such as the interconnector between SA and NSW to facilitate diversified energy supplies.</p>
<b>Saving in greenhouse gas</b>	<p>Studies have proven that a small increase in electricity prices have had a far more effective impact in reducing the need for electricity, and therefore reducing carbon emissions, than investing in unreliable renewable energy, such as wind turbines.</p> <p>Carbon saving/reduction is not being correctly quantified. The life cycle assessments (LCA's) conducted to ascertain the "pay-back" period alone proves the development fails to meet its stated objective. More carbon is used in the manufacture, transport and construction of the turbines. Consideration needs to be taken into account for the mining of all raw materials, overseas manufacturing of steel towers, reinforcement steel, concrete, road construction, all transport needed, ongoing maintenance requirements and dismantling/reinstatement at the end of the project's life.</p>
<b>RET scheme</b>	<p>The generation of LGC's – Large Scale Generation Certificates will likely benefit the owners/investors of the development in the <i>short-term</i> only, where they will be able to trade carbon credits on the open market purely based on what the turbines</p>

	<p><i>generate</i>, NOT necessarily what is <i>consumed</i> – ie irrespective if the power is actually used locally or not (ref Clean Energy Regulator “<i>Large-scale generation certificate eligibility formula</i>”).</p> <p>As referenced in the Renewable Energy Market Report Feb 2018, the spot price forecast for LGC’s shows a reduction from \$84.35 to \$38.50 by 2021 and “...<i>will ultimately fall to zero</i>”. This incentive scheme/catalyst for such renewable energy projects is no longer a viable basis for a business case, and accordingly, the long term viability of the development is put into question. If the (questionable) company structure is taken into consideration, the Nation could be left with an expensive renewable energy source that it now has to subsidise and where the proponent has already ‘taken the money &amp; run’.</p>
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From the table above, it is clear that the imperative drivers are not justified, or at least require significantly more analysis in order for the Minister to make a truly informed decision.

#### ENVIRONMENTAL ISSUE: LACK OF EVALUATION OF ALTERNATIVE RENEWABLES

The proponent has not described or “*considered alternatives in order to achieve their objectives*” which was required under the original NSW SEARs and is a legislative requirement under the EP&A Regs Schedule 2, 7.1(c) where “*an analysis of any feasible alternatives*” must be completed. An evaluation report considering all forms of alternative renewable energy options should have been included in the EIS.

A requirement of the NSW SEAR’s was for the proponent to consider and prove why wind power was the most appropriate for this area.

If they completed this in any form, they would have identified the differences as captured in the table below – clearly the benefits are strongly towards solar, which is likely why they chose not to complete the evaluation. The proponent has simply ignored this requirement of the NSW DP&E, and somehow the Department is no longer seeking justification?

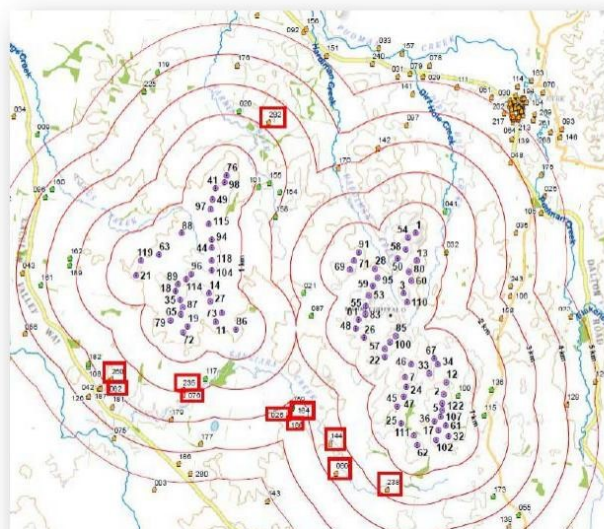
The Minister has a duty to properly and thoroughly compare renewable energy generation models, if indeed the Minister can justify additional renewable power requirement in the first place.

SOLAR	WIND
Reliable and predictable energy source	Less reliable and un-predictable energy source
Greater community support	Greater community objection
Capitalises & supports Australian technology and innovation	Relies on international technology
No noise or infrasound	Noise & infrasound impact
No vibration	Vibration impact
No known health impacts	Known health impacts
Very low visual impact	Extreme visual impact
Screening done on host’s property. <i>Neighbouring properties not affected.</i>	Screening done on <i>neighbouring</i> property with little effect and <i>not recommended.</i>

How is wind power justified when the above are properly and duly considered, especially given the context and issues raised by the Yass community? Furthermore, as the NSWDP&E has noted in Section 2.1 of their Assessment report, considering eleven projects have already been approved within 60km radii, it would make even more sense for a diversified energy source to be considered. The hosts (farmers) retain their financial compensation/fee/benefit with minimal impact to others and there may in fact be opportunity for more hosts.

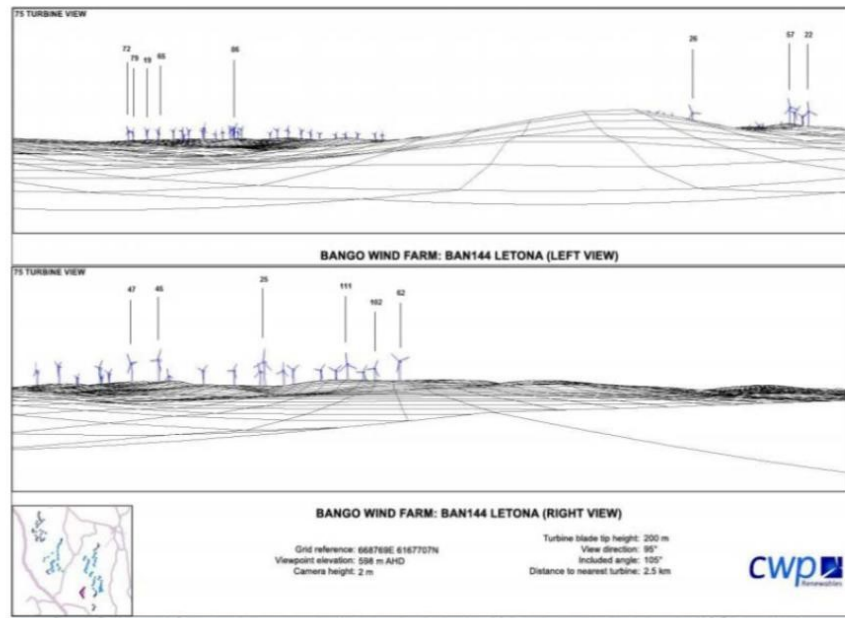
#### SOCIAL ISSUE: MASSIVE IMPACT ON COMMUNITY & OUR VISUAL AMENITY

Specifically, one of the most significant social impacts on our community and their amenity will be visual impact, and the corresponding conversion of the tranquil rural landscape to essentially an industrial estate. The proposed 200m high turbines located across our ridge lines erode the most idyllic setting that it provides our family, neighbours and visitors alike. As clearly shown in the diagram below (extract from NSWDP&E SSD report), the current proposals have the turbines clustered so closely together, creating a "forest", which has an intensity and massive visual impact especially when compared to other large turbine projects. (Note: breeding habitat of the Superb & Swift Parrots are also located in these clusters)



The independent visual impact report conducted by O'Hanlon Design **reclassified** a number of residences with a **higher impact** from the original assessment by Green Bean (conducted by the developer). Importantly, our residence, **no. 144**, was classified as **"significant impact"** as a result of cumulative visual impacts from both the southern Kangiara and Mt Buffalo clusters and being only 2.5kms from the nearest turbine.

D&U Aroney 'LETONA'  
LAVERSTOCK RD  
YASS NSW 2582



Furthermore, the proponent has not considered the visual impact from one of our larger, higher altitude lots which constitutes a large part of our property and where we intend to establish another residential dwelling. The impact here would be extreme.

The detailed topographic map identifying the specific turbine locations and the associated photomontages provide striking evidence of the adverse impact that the Bango Wind Farm will have from our residence, in fact the impact is not adequately represented as it only focuses on the view from our house. As mentioned by one of the speakers at the recent PAC meeting, *"...our farm is also our office, our garden, our outdoors, and our recreation"*. The visual impact is intolerable, and it will be exacerbated by the additional effects resultant from noise, vibration, blade glint, shadow flicker and disturbance from artificial night lighting.

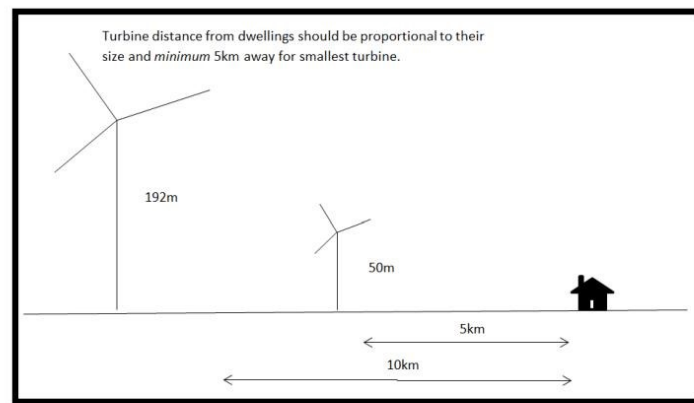
The Bango proposal should only be assessed following the development of the national standard for visual and landscape impacts as per recommendation #6 of the 2015 Senate Select Committee on Wind Turbines.

It is important to note the scale of the turbines being considered as they are massive. As shown as a comparison to the Sydney Harbour Bridge, these will dominate the landscape and any amelioration recommended by the proponent or NSW DP&E by "screening" is farcical. The NSW Guidelines (*NSWDPE Wind Energy: Visual Assessment Bulletin - for State Significant Wind Energy Development*) does NOT recommend vegetative screening as a mitigating measure as valuable views are lost in the process.



**Image:** Comparison of proposed turbine height & Sydney Harbour Bridge + Visual Impact on our property (note bridge summit to water line is 134m ...proposed turbines are 66m above the bridge)

The overall “set backs” to residential properties should be proportional to the height of the turbines.



The O’Hanlon report acknowledges the **cumulative visual impact is significant for 19 residences**, with the majority of these enjoying views/aspects to the most valuable north and north east views.

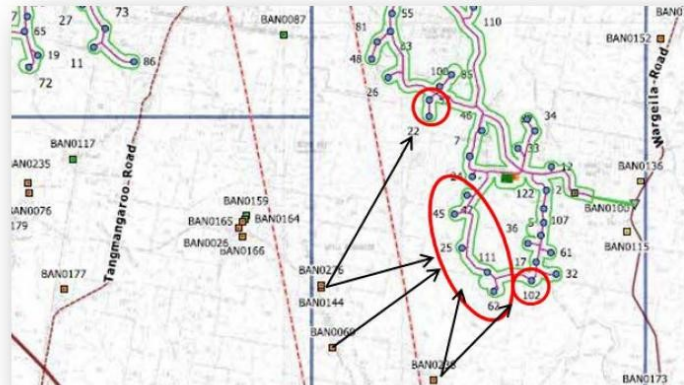
Furthermore the NSWDP&E SSD Report acknowledges on page 32 that R60, R144 (ours) & R238 have a series of turbines in close proximity which they would consider recommending for removal and adding the requisite conditions. We are unsure how the NSWDP&E has assessed and valued residences and the associated visual impacts to the north, resulting in significant reduction in numbers of turbines when the impact was equivalent, or if not worse, in many instances.

Accordingly, as a minimum should the project be approved, we seek the Minister’s directive to remove the following turbines:

Layout Option 1	Layout Option 2
57, 22, 47, 45, 25, 111, 102,62	6, 44, 103, 41, 54, 28, 93, 31



With most significant impact for all three residences being turbines #25, 62 & 111 (in Layout Option 1, and corresponding turbines in Option 2). A number of these have already been identified to be deleted by the NSW Office of Environment and Heritage in their letter to the NSW IPAC dated 21.03.18.



#### **SOCIAL ISSUE: NOISE & VIBRATION**

The NSW Director General's Requirements have not been followed with respect to the mandatory requirement for an accurate assessment of the noise impacts of the proposed development, which specifically required the proponent to include a *"comprehensive noise assessment"*.

The proponent's acoustic report has failed to provide such a noise impact assessment, and the NSW Department of Planning has failed to ensure that such an assessment was provided.

The wind turbines are audible, and as identified by the Waubra Foundation, *"...if approved, the harm which will result to the surrounding community members near Bango is predictable, measurable, and actionable via noise nuisance litigation. In addition relevant professionals and decision makers could also be sued for professional negligence, particularly in the light of the recent AAT decision"*.

In addition, the World Health Organisation (WHO) has produced numerous scientific reports on the impacts on human health due to noise (audible and in-audible) and visual pollution from industrial wind turbine farms. The reports by WHO and other independent major international organisations are commissioned with no vested interest, and accordingly countries around the world who have embraced wind power are now facing mounting community outrage due to noise levels and the consequential health impacts. The recent research has indicated that anyone within 10km radii of a wind farm is likely to suffer health related problems due to the noise and vibration impact of the turbines.

The reality is that modelling of predicted noise levels cannot be proved until the wind farm is operational, by which time it becomes a costly exercise to either turn off or remove the offending turbines which is extremely unlikely. Developers will offer reassurance that levels will be monitored, but what practical action can be taken when levels are found to be too high?



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YASS NSW 2582

The DPE report identifies that compliance *cannot* be achieved for residence #238 – how is this non-compliance of such a fundamental right for the residence deemed acceptable? The Minister must as an absolute minimum remove offending turbines in close proximity to this residence (turbine 62 and 102 as above which will also ameliorate already stated visual impacts).

The adverse impacts to health are also identified and endorsed in the NSW Department of Planning's report "*Wind Turbines and Proximity to Homes: The Impact of Wind Turbine Noise on Health*".

The EIS identifies that "minor exceedances were predicted in the initial layout", and this should be further evaluated at night where the allowable background noise is often below 20 dBA.

Finally, the proposal should be assessed in accordance with requirements which come from Recommendation #6 of the 2015 Senate Select Committee on Wind Turbines – being the formation of Independent Expert Scientific Committee on Industrial Sound to create a national standard on audible sound, national standard on infrasound, low frequency sound and vibration, and a national standard on minimum buffer zones.

#### CONCLUSION

We live in constant fear and threat. We vehemently object to the proposed development due to the nature, location, scale and impact on the threatened & endangered species, ourselves and the surrounding community. The regulatory framework overseeing developments of this nature has failed by allowing proposals like Bango (as well as Rugby and Rye Park) wind farm to be put forward without greater levels of planning control and proper consultation. The cumulative impact on all levels of these proposed developments in such close proximity to endangered habitats and species will be devastating to the area and Nation overall, and puts in question the definition of critical social and economic considerations which need to be adequately assessed under the EPBC Act.

We are perplexed as to how many of the requisite planning controls and mandatory requirements of the NSW Director General of the NSW Department of Planning have been disregarded by the proponent, and similarly not adequately assessed or addressed by the NSW DP&E and NSW independent Planning & Assessment Committee.

We appeal to the Minister to agree that there would clearly be unacceptable impacts, and that the project cannot proceed based on the information above and those impacts acknowledged and documented in CWP's own preliminary documentation.

Yours faithfully,



Don Aroney

9.5.2018



Matthew Allen  
22 Linton St  
Baulkham Hills  
2153

General Manager  
Bango Wind Farm  
PO Box 1708 Newcastle 2300

Dear Sir/Madam

Re Bango Wind Farm  
have your say. Renewable technologies have barely scratched the surface, on what is possible. Proposed Wind Farm construction of towers, investment out lay, time waiting to be cash flow positive, future competition on electricity price.

Kind Regards

Matthew Allen

# **Annexure A**

## **Correspondence**

1. Letter from the Office of Environment and Heritage, South-East Region to the Independent Planning Commission NSW
2. Response letter from the Department of Planning and Environment to the Independent Planning Commission NSW (with 2 attachments)
3. Response letter from CWP Renewables to the Independent Planning Commission NSW