Anne-Marie Vine
[redacted]
Kariong 2250
14/07/24

As a concerned resident of NSW, I have a moral obligation to ensure that our current generation secures a sustainable, biodiverse environment for the future. This means that alternative energy projects still need to be assessed for capacity to meet this goal, and not just for profit. I object to the Hills of Gold Windfarm (SSD9679) as the application by Engie does not address a range of environmental issues, leading to a short-term alternative energy benefit, which does not come close to outweighing the long-term environmental costs.

This further submission contains the same concern as my original as the public submission information presented earlier in the year seems to have been totally discarded, with the DPHI changing their minds to reinstate 15 of the 17 non-compliant turbines.

If the project is so tenuous that it can't sustain that reduction then it is further evidence that this is not a viable operation and is driven solely by profit and not consideration of the need for alternative energy projects to no longer decimate our ecosystems, in the same way that previous mining ventures have done. What have we learnt if we just still practice environmentally damaging invasive building in the pursuit of the quick and easy dollar. What confidence can we have in the DPHI if their own recommendations can be overturned at the behest of profit, not land security. Engie's threat to abandon the project appears to have held sway. Is this all that big business has to do to get its way? It makes the integrity of planning permission very suspect.

Of continued concern, is that the DPHI is drawing on draft legislation to condone its decision making process. Is this a precedent? And a scary one at that? We should be using the rules that exist for this time period and apply them as written. Where in law is it OK to refer to a 'draft' document as being legally binding? Nowehere! How is this justified morally, ethically and legally? I would really appreciate answers to those questions. Without those guidelines in place, decisions can be made at a whim or considered to be corrupt.

DPHI, in fact, acknowledged in their Final Assessment report to the IPC in February 2024 that "...the Draft WEG 2023 does not apply" . The tune has changed now such that "....however, in this assessment the Department has adopted the approach prescribed in the Draft Guidelines 2023 as an exercise". Of concern, in reference to corrupt practice is that "the exercise" of utilising the Draft WEG 2023 was only applied by DPHI to the turbines recommended for removal and the associated properties. You cannot cherry pick only some parts/some turbines/ some properties and apply different Guidelines to them and not uniformly apply them everywhere in their fullest form, without the whole process coming under examination for being flawed and corrupt, especially in regards to the Government's own Code of Practice.

Returning to the issue of the turbines that were to be removed from the first report. The turbines slated for removal by the DPHI's Assessment were due to 15 being non-compliant with visual and noise guidelines (2016 Visual Assessment Bulletin) and 2 due to negative Biodiversity impacts. (1 turbine #24 sat in both camps). How have these issues been resolved? Engie's response to the DPHI on this issue was that they should be able to "acquire" that land, irrespective of the landowner's legal CDC (Complying Development Certificate) for a house on that property. This information and arrogant stance was not included in previous materials that were presented prior to the submission. So essentially, the project does not fit the guidelines (round peg) so we will

force it to fit (square hole) by suddenly changing DA rules? Again, you allow this to happen and where next will legal CDCs be overwritten? This ridge is important for all the reasons cited in previous objections. There are other ridges. And as I have stated, using already cleared land takes away from destroying our bush corridors and the species that they protect.

Concerns, such as water and soil issues raised in the public submission have not been addressed. This reinstatement should not go ahead, but if it is to happen then it must not do so without research into impact answering those concerns, and then be made public.

In conclusion, it is not a public benefit to approve:

- a marginal to unviable wind farm;
- a State Significant Development on unlawfully cleared land;
- Imposing Voluntary Land Acquisition on a non-associated neighbour and setting a precedent for other State Significant Developments statewide;
- A wind farm between two national parks, Crawney Pass National Park and Ben Halls Gap Nature Reserve (including Critically Endangered Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest);
- A wind farm without detailed design of internal roads on steep gradient land, with high erosion, sedimentation, and mass movement risk requiring mitigation with potentially understated environmental impacts and financial liability.

Thank you for reading through this submission. I hope that my words help revise the proposal to go ahead with a 67 turbine wind farm in such an unsuitable area.

Regards

Anne-Marie Vine