

1. Hills of Gold Wind farm SSD-9679

Without Prejudice - Save as to Costs

I object to the Hills of Gold (HoG) Wind farm, and confirm all my previous reasons for rejection submissions.

During ownership of the above property I met with officers from the Department of Planning (to be as referred to here as the Department) on a number of occasions.

These meetings were mutually courteous and respectful.

All I asked of these officers was that their investigation be conducted in an objective and professional manner in accordance with all the relevant statutory requirements and guidelines. Firstly, there are many important issues that have not been fully investigated, including waste disposal, health risks associated with blade shedding but these issues are prevented from further investigation in accordance with IPC instructions.

The government has consulted with experts and has identified Renewable Energy Zones (REZ) within the state.

This application relates to land that is considerably isolated from such a designated area and as such reflects on the economic viability of this proposal.

I refer to the Department's response based on IEAPPETS advice that constructing 62 turbines is the only viable option for a wind farm **AT THIS LOCATION**.

It further states public interest as a reason for their decision reversal.

Firstly the location was chosen by the industrial developer outside the REZ and as such, the costs for developing in the area would be higher than those located within a REZ.

This decision should be regarded as a commercial investment risk that the developer is solely responsible for.

They were not forced to make an application for such development at this location and that commercial risk decision should not override all of these issues to be assessed and judged within the framework of the Environmental Planning and Assessment Act 1979 No 203.

The objects of this act:

1.3 (a) to promote the social and economic welfare of the **COMMUNITY** and a **BETTER**

ENVIRONMENT by the **PROPER MANAGEMENT, DEVELOPMENT** of the state's **NATURAL** and other resources.

(b) to facilitate the ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision making about environmental planning and assessment.

(c) to promote the orderly and economic use of land

(d) not applicable in this instance

(e) to protect the environment including the conservation of threatened and other species of natural plants and animals, ecological communities and their habitats.

(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage).

(g) not applicable in this instance

(h) not applicable in this instance

(i) to promote the sharing of responsibility for environmental planning and assessment between different levels of government in the state.

(j) to provide increased opportunity for community participation in environmental planning and assessment.

The act then goes on with a list of definitions.

Now, the key words include **ENVIRONMENT, NATURAL ENVIRONMENT, CONSERVATION OF THREATENED AND OTHER SPECIES OF NATIVE ANIMALS AND PLANTS, ECOLOGICAL COMMUNITIES** and their **HABITATS**.

There is **NO** reference to developer economic sustainability and nor should there be.

Developer **PROFIT** should not take precedence and ignore the basic purpose of the Act, that is the natural environment and native flora and fauna.

The developer chose to make a commercial investment outside the areas designated for such purpose and all of the relevant items noted for protection **SHOULD NOT BE COMPROMISED FOR DEVELOPER PROFIT**.

Further, the Act refers to community benefit, with community defined as a social group of **ANY SIZE**, whose members reside in a specific locality, shire government and often has a common

cultural or historic heritage, a locality inhabited by such a group.
It makes no reference to **PUBLIC BENEFIT**.

Now Tamworth Regional Council (TRC) has, as stated at the IPC, approved 19 similar projects within the REZ. I believe that economic sustainability is not an issue with these projects. This is the only one that they have objected to. If this is approved, have they got it wrong on the other 19 projects?

Finally, as a person who studied planning as a subject 50 years ago, I question as to why this proposal has been given the concessionary considerations that it has received during this process.

Should the proposal be approved it will make a mockery of what planning is theorised to achieve, it will set precedents for developers of other projects to object to developments that could include height restrictions and site density coverage on the premise of **ECONOMIC VIABILITY**.

This is the wrong area for such a proposed development, and the responsibility of a non-viable, economically sustainable development is the sole responsibility of the applicant and should be rejected in its entirety.

Taralga Wind Farm

Freehills have referred to the decision of Justice Preston in relation to the above and it appears that this reference is fundamental to the Department reversing their previous decision of recommending that the development be reinstated from 47 turbines to 62 turbines.

Of concern to me is that the Department had all the information relating to this project and have not considered the following:

Firstly, I declare that the time constraints have prevented me from inspecting this site so I have relied upon publicly available published information and photographs.

1) Taralga. 51 turbines approved, 2012 Original application for 61 turbines.

2) Original application with turbine height of 110 metres and subsequently increased to 131.5 metres.

3) These turbines are approximately 98.5 metres smaller than proposed for Hills of Gold Wind farm but of concern is that the turbines approved in May 2024 by the IPC for the Thunderbolt Wind farm are 260m (twice the height of Taralga).

If HoG is approved will the turbines be as originally stated as 230m high or the 260m turbine as for Thunderbolt Wind Farm.

Whilst there is substantial size difference in the turbines at Taralga and the proposed HoG turbines. There are many factors that appear to have been ignored in accepting the Taralga decision at face value.

It is claimed that the concrete bases for the Taralga turbines have the equivalent of 3 double decker buses of concrete. Consider this, the turbines proposed for HoG are almost twice the size on a ridgeline that experts define as fragile soil. How much concrete will be required to ensure stability of these structures? Certainly substantial increased costs, which affect the economic viability. This also confirms that this site is unsuitable to this type of development.

Physically, the photos of Taralga show a vastly different landscape which I have described as low, generally cleared, undulating ridgelines. In no way being comparable to the geography of the proposed HoG development (refer Schedule 1 - Taralga Wind Farm)

Schedule 1 - Taralga Wind Farm



All of the characteristics of soils, water, vegetation, native fauna and flora, endangered species, koala habitat, etc, relating to HoG are not evident with Taralga.

Now no-one can presume as to how a judge may find favour on behalf of one or the other but any fair-minded, reasonable person would recognise the substantial differences in all relevant aspects of Taralga and HoG.

Why has the Department chosen not to disclose these variations between the two projects?

Importantly, the 2016 Guidelines did not exist during the Taralga process. Comparisons should be made on the basis of like for like characteristics and not only on the sole similarity of wind farm and wind farm.

IEAPET ADVICE dated 14/06/2024

Firstly, I don't accept that IEAPET is independent, and my reason for this is that one of the members has reportedly worked in the Renewable Energy sector for approximately 12 years.

Now, in my professional career, I have witnessed how small adjustments of figures and percentages can cause substantial variations in the end result in projected profitability of a project.

The applicant made a commercial risk decision to propose this development outside the REZ, and hence is not able to take advantage of proximity to suitable existing transmission lines. By making this decision, there are substantial additional costs of negotiating access easements through private properties and transmission line construction costs.

As a former property professional, I would strongly urge any rural property owner to not grant such easements.

This virtually gives up control of your own property with unknown people having the right to enter dependent upon the easement conditions. Of particular concern is Agricultural Bio-Security Act 2015.

The implications for breaches of this for a rural property owner are endless as any potential contamination risk becomes the sole responsibility of the property owner and not any person or organisation that caused the issue.

Easements and ROW are a definite NO.

I take further exception with IEAPET advice:

Allowing for Optimisation: One provision that would be favourable for this (and all wind farm projects) is for approval conditions to maximise allowable scope for post approval optimisation without requiring further formal assessments, especially if approved turbine numbers are fewer than in the proponents proposed configuration "if small adjustments can be made to turbine placements within an approved envelope or distance from approved locations."

Now, the words "favourable for this and all wind farm projects" may be accepted as independent by some but my interpretation is that they are blatantly in favour of wind farms.

If this advice is followed why have a planning process at all, with these statements being in total contradiction of Clause j of the objects of the Environmental Planning and Assessments Act 1979 No 203.

Forget the objects of the Act just accept blatant, biased ideology being represented as independent advice.

I have zero tolerance to those I deem being untruthful.

The IEAPET advice is based purely on projected economics and costs as provided by the

applicant , and not available for check by those opposing the project. Furthermore, IEAPET ignores environmental issues and does not highlight additional construction costs affected by soil instability and drainage.

Conclusion:

The decision to be made in this instance is not about the hasty need for renewable energy, but rather if this proposed renewable energy project complies with ALL the laws and prescribed guidelines for this project in this area.

If all of these issues are considered in an objective professional manner, then the project is a definite NO.

To find otherwise would give cause to a tainted decision and some of the issues raised, and prevented from being raised, and the heavy emphasis of the requirement of developer profitability is, I believe, grounds for a complaint to ICAC for corrupt behavior.