

NSW Government
Independent Planning Commission

I previously submitted an **OBJECTION** to the NSW Department of Planning and Environment about the proposed **Hills of Gold Wind Farm**. Following the assessment of the project by the Department of Planning and Environment I continue to believe the Hills of Gold Wind Farm **should not proceed**.

I have visited the Isis River valley around Timor on several occasions. I have marvelled at the iconic mountain vistas from my sister in-laws property, Alston. To be able to see the majestic Wedge Tailed Eagle in the wild soaring along the ridges was fantastic. It would be a tragedy to lose this.

My concerns are around the following issues arising from the assessment.

1. **Department response to concerns about processes.**
 - a. The initial documents and the Department's assessment processes did not seem to me to consider the option of not approving the project.
 - b. The Department did not appear to recognise the concerns raised about the independence of the preparation of the EIS.
 - c. The department also made no comment on the gaps and shortcomings of the applicant's "Community engagement strategy" document. In particular with regard to communities south of the Range.
2. **The impact on roads**
 - a. The report appears to primarily focus on the proposed heavy transport routes for the construction of the wind farm. It appears that the Department accepts that upgrades of the roads will be more than adequate in a very steep and difficult environment. There seemed little consideration of any additional requirements that should be included. The upgrade of these roads to be able to support the massive vehicles needed would be substantial undertakings which would also be out of character for the area.
 - b. There seemed to be little consideration of the impacts of changes to traffic on Upper Hunter Roads south of the range.
 - c. There was no responsibility assigned for the ongoing maintenance of these roads.
3. **Water catchments**
 - a. The assessment report addresses erosion from the site during construction and operations and has accepted the control measures proposed by the applicant. There does not seem to be any assessment of how the project might change water flows to surrounding creeks and rivers. Given the how reliant local farmers are on these flows any disruption or changes could significantly affect their livelihood.
 - b. The assessment report identified several rivers, namely the Peel and Hunter, however I could not see any reference to any assessment of potential impact on the Isis River.
4. **Fauna corridors**
 - a. The removal of trees and other vegetation along the ridge top will surely disrupt a corridor for movement of native animals between the adjacent Nature reserves and National Parks. The Assessment made no mention of how this issue was determined and subsequent impacts on the flora and fauna in the area.
 - b. The assessment did not appear to mention the reduction of Koala habitat.
5. **Impact on birdlife**
 - a. The Department of Environment and Planning assessment of how the project might affect bird and bat life appears to predominately focus on impacts of birds and bats

with the turbine blades. I would have thought there should have been some further more widespread assessment on how the project would affect the birds of the overall area. Will the towers restrict bird flight paths when seeking food and roosting areas? It would be a tragedy if the project prevented the magnificent Wedge-tailed Eagle from cruising the ridge-line.

6. Offset practices

- a. The practice of offsetting the loss of native habitat cannot cover the loss of actual habitat on the Ridge and environs due to the project's construction and operation activities. Each area is unique.
- b. Given the current concerns about the integrity of such offset schemes. There needs to be more detail about the use of offsets for the loss of native vegetation. Where are the creation of these additional areas of vegetation located? Surely it is new vegetation to replace the vegetation which might be lost and not pointing to existing areas.
- c. This needs to be an independently auditable scheme to ensure compliance.

7. The Visual impact.

- a. The assessment of the proposal has required a reduction in the number of turbines from the original submission. I believe this misses the point that these ridges of the Great Dividing Range are essential to the character of this iconic environment. Any wind towers on a ridge such as this degrades the visual amenity.
- b. The assessment of visual impact of this project predominately focussed on the dwellings around the project. The impact on the general public views appeared to be minimised by the view that there were few tourist and visitors in the area. There did not seem to be consideration of the inherent value of uninterrupted mountain vistas.
- c. How long before the proposed vegetation screens become effective?

8. **Monitoring and Compliance to Recommendations**

- a. The assessment report identifies actions and plans that the applicant is required to prepare to deal with issues raised in the assessment. There are no processes identified to ensure the adequacy of these plans in meeting the requirements and the timing of the implementation of these actions, such as soil and erosion mitigation, bird strike mitigation, minimising of vegetation removal, offset schemes etc
- b. The report also does not identify the means for monitoring compliance to the Project's conditions and statutory obligations. This monitoring and auditing should be done by independent government auditors.

Yours Sincerely

Paul Tyson

