

**The Independent Planning Commission
GPO Box 3415
Sydney
NSW 2001**

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From objector: xxxxxx

9 February 2024

Attention: The Chair of the Assessment Panel

Objection to Application SSD 9679
Hills of Gold Wind Project

Dear Mrs Sykes,

My profession is project management in the construction industry. In the first year of my degree course, one of the subjects was the History of Building. It emphasised the importance of preserving the heritage of the built environment, but also recognised that the built environment and the natural environment should be complementary.

The natural environment at the proposed site of the Hills of Gold Wind Project has developed over hundreds of thousands of years. It is the home to some of Australia's unique flora and fauna. We are the custodians of that environment, and in the same way we have a responsibility to preserve our built heritage, we must understand that we also have a responsibility for our environmental heritage. We must speak for the creatures that can't speak for themselves.

"NSW has one of the world's most diverse and beautiful natural environments, including its plants and animals. Yet despite our natural wealth, NSW has nearly 1000 species on the verge of extinction."

- Former Department of NSW Environment and Heritage

Do we then condemn the unique creatures of the proposed wind project site to the same fate as one of Tasmania's unique creatures, the thylacine, which was driven to extinction because of the failure of people to understand that it had more right to exist in the natural environment than those who came after it.

If this project is approved, the estimated bird kill, over the proposed twenty years of the project's life using two separate studies would be:

- Report on bird and avifauna mortality commissioned by AGL Energy for its Macarthur Wind Farm found that 10.19 birds were killed by each turbine in a 12-month period. (Section 5.4 - 2015 Senate Select Committee on Turbines Report) – **9,585 birds.**
- #Smallwood (2013) undertook a detailed assessment of correction factors based on data from 60 different reports and estimated an average mortality of 11 birds per MW per year, implying 22 birds per turbine for a 2 MW turbine. – **62,082 birds.**

The carcasses of the dead birds attract feral animals, such as foxes and cats. The surrounding bushland then becomes a killing ground for these feral animals and the decimation of small mammals, snakes, lizards, frogs and nesting birds becomes inevitable.

The continuing destruction of the Australian countryside is unacceptable to Australian citizens who support farmers, graziers and regional Australians in their campaign against the irrational development of wind projects and solar projects, which are environmentally destructive.

When determining any planning application, primary consideration should be given to the principles of ecologically sustainable development as stated in:

Federal Legislation - Environment Protection and Biodiversity Conservation Act 1999

3A Principles of ecologically sustainable development

The following principles are *principles of ecologically sustainable development*:

- (a) decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations;
- (b) if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation;
- (c) the principle of inter-generational equity—that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations;
- (d) the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making;

Considering each of the aforementioned principles, as they relate to SSD-9679:

3A (a) decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations

Wind projects are considered to be short term installations and the push for nuclear energy in Australia and the rest of the world to provide reliable, sustainable, affordable energy while not emitting carbon dioxide will, in my opinion, see this project, if approved, become a stranded asset.

When considering environmental issues there is a dark side to renewable energy. Much emphasis is placed on the worldwide production of carbon dioxide by the burning of fossil fuels. What isn't discussed is the life cycle of wind turbines which includes the sourcing and mining of raw materials to enable the manufacture of wind turbines and their associated infrastructure (The Dark Side of "Renewable Energy" – Phases 1 and 2)

Social impacts include, what is increasingly being reported as the use of forced labour by some wind turbine manufacturers in the production of wind turbines (The Dark Side of "Renewable Energy" – Phase 4)

3A (b) if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation

Again, there are threats of serious and irreversible environmental damage associated with the manufacture, installation and decommissioning of wind turbines. (The Dark Side of "Renewable Energy" – Phases 1, 2, 3, 5, 7, 8 and 9).

Wind turbine blades are not recyclable and are currently buried. Toxic elements in the blades then leak into the water table and poison the groundwater. Currently there is no effective waste

management plan for the decommissioning of wind turbines. The bases of wind turbines containing tons of concrete and steel are left in the ground effectively preventing any ongoing use of that area.

Mining leases are required to provide bonds for the rehabilitation of mined areas at the completion of mining operations. No such rehabilitation bonds are currently required for wind projects which has resulted in many abandoned wind projects overseas being left as ghost structures dotting the landscape.

3A (c) the principle of inter-generational equity—that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations;

Wind projects are short-term installations and will not provide meaningful jobs for the local community during their short lifetime as opposed to ongoing employment for locals. As noted in 3A (b), the inground bases of decommissioned wind turbines prevents the land they're built on to be effectively reused. Thousands of tonnes of concrete and steel will remain as a testament to the folly of those who believe wind projects and solar projects are the answer to Australia's energy needs.

With coal, gas and uranium, Australia has energy sovereignty. With wind projects, PV solar projects and batteries we cede our energy generation to a foreign power. Energy security is national security. This is providing meaningful inter-generational equity and security.

There is an ancient Indian saying:

“We do not inherit the earth from our ancestors, we borrow it from our children”

Intergenerational equity for our children, grandchildren and the descendants of all Australians must be foremost in our minds.

3A (d) the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making;

The conservation of biological diversity and ecological integrity should not only be considered in relation to the local areas. The life cycle of wind projects should always be considered in relation to ecologically sustainable development elsewhere (See Appendix A – The Dark Side of “Renewable Energy” – Phases 1 and 2).

Wind turbines are bird killers. The bird carcasses attract foxes and other feral animals such as feral cats. Foxes and feral cats don't discriminate and kill domestic animals, small livestock and small native mammals.

The proposed Hills of Gold Wind Project would not be conducive to the conservation of biological diversity and ecological integrity.

The Supplementary Sears document, Hills of Gold Wind Project (EBPC 2019/8538) (SSD 9679), lists Critically Endangered, Endangered and Vulnerable Fauna on the Proposed Site. Critically Endangered, Endangered and Vulnerable Flora on the Proposed Site. Critically Endangered Fauna on the Transport Route. Critically Endangered and Endangered Flora on the Transport Route. There is no amount of biodiversity offset that would compensate for the loss of the listed fauna and flora.

The information in the Supplementary Sears alone, should confirm that approval must not be given for this environmentally destructive project. As per the EBPC Act clause – **“the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making”**.

The four videos below show why wind projects need to be stopped to prevent the destruction of Australia's fauna and flora. They were prepared by Steven Nowakowski an environmentalist and supporter of renewable energy until he saw the destruction wrought on the environment by the Kaban Wind Project.

Short Upper Burdekin Film <https://vimeo.com/706882264>

Short Kaban Film <https://vimeo.com/633451905>

Short Chalumbin Film <https://vimeo.com/582415839>

Kaban destruction <https://vimeo.com/775033740>

Transition to Extinction <https://youtu.be/QLUH4wqjNm8>

The Executive Summary below from the GWPF Report 36 – 'Green Killing Machines' – Andrew Montford, succinctly sums up why we shouldn't pursue the rollout of a patchwork quilt of environmentally destructive, toxic, unreliable, unaffordable wind, solar and batteries connected by a web of HV transmission lines threatening Australia's food production capability.

'Renewable energy has developed itself a reputation as being environmentally friendly. This report will show that this reputation is entirely undeserved. Far from improving the world around us, wind, solar, biomass and even hydropower can be highly damaging. A renewables revolution on the scale envisaged by global warming activists will see our landscapes desecrated, our fields industrialised or turned to monocultures, and our wildlife slaughtered.

Far from making the world a better place, renewable energy will destroy all we hold dear. Is this really what environmentalism has come to mean?'

Australia is signatory to the Paris Agreement 2015 which states:

“Article 2 (b) Increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development, in a manner that does not threaten food production.”

Other Conditions of Approval to be considered

1. a bond is held from start of project with guaranteed finance in place to cover decommissioning and full project removal, disposal and rehabilitation costs at end of life;
2. appropriate regulations are in place to protect threatened and endangered species;
3. large scale renewable projects are subject to full state government approval processes and be made impact-assessable not code-assessable;
4. an appropriate land access framework to protect the environment, cultural heritage and existing land users is established;
5. minimal impact upon existing rate payers is negotiated;
6. Australia's food security is protected by prohibiting large scale renewable projects on prime agricultural land; (See Paris Agreement Article 2 (1) (b))
7. all large-scale renewable projects comply with the same regulations that apply to agriculture and mining;
8. large scale renewable projects are added as a trigger to the EPBC Act;

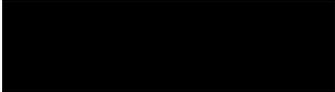
Objection to Development Application SSD-9679

9. a mandatory code of conduct is established to govern the renewable energy sector and renewable energy proponents' conduct with affected communities.”

It is ridiculous that Australia is currently not effectively using its abundant coal, gas and uranium resources to provide an affordable, sustainable and reliable energy generation network for its citizens and businesses.

In conclusion, the Federal Government needs to legislate to remove the prohibition on nuclear energy, which is required to meet Australia's national security needs and not rely on supply chains that use forced labour and are becoming more tenuous.

Yours faithfully,

A solid black rectangular box redacting the signature of the author.