

Commissioners,

I would like to suggest that the Hills of Gold wind farm (HOGwf) is not in the public interest, and it has to be.

The EP&A Act, 1979 says as part of your determination that you “must take into consideration” a number of factors.

Section 4.15, subsection (1)(e) of the EP&A Act says succinctly:

“The public interest”

No more, no less, on the last line all by itself.

It doesn't go on to say wording that the Department has added over the last 6 or so years.

For example the new Draft Wind Energy Guideline 2023 says:

“An analysis of the public interest, including the public interest in renewable energy, **the objects of the EP&A Act and the principles of ecologically sustainable development**” (emphasis added)

In the HOGwf SEARs, the term “the public interest“ does not appear.

But, this does (elevated to the first paragraph):

“the reasons why the development should be approved having regard to: relevant matters for consideration under the Environmental Planning and Assessment Act 1979, **including the objects of the Act and how the principles of ecologically sustainable development have been incorporated in the design**, construction and ongoing operations of the development” (emphasis added)

and in the Assessment:

“4.5 Mandatory matters for consideration

40. Section 4.15 of the EP&A Act outlines the matters that a consent authority must take into consideration when determining development applications. These matters are summarised as:

- the provisions of environmental planning instruments (including draft instruments), development control plans, planning agreements and the EP&A Regulations;
- the environmental, social and economic impacts of the development;
- the suitability of the site;
- public submissions and advice from government agencies; and
- **the public interest, including the objects in the EP&A Act and the encouragement of ecologically sustainable development (ESD).** (emphasis added)

These additions have enabled the Department to elevate the objects in the EP&A Act and the encouragement of ecologically sustainable development (ESD) as among the prime drivers of “the public interest”

Commissioner Sykes, in her opening remarks confines them to the spirit of the Act:

“In making a decision in this case, the Commission must obey all relevant laws and consider all applicable policies and **the public interest.**”

Commissioners, it must be clear from your visits, meetings, discussions and the public submissions that a large proportion of the local community and surrounds does not

consider that this project is in the public interest for a variety of logical project related reasons.

Many of us in the wider community agree for local and broader reasons.

How could we support any wind farm when its contribution to a fossil fuel free future is totally unpredictable and becoming more and more expensive? Note that there is only one instance of “affordable” in the Assessment. This term was once touted as a key benefit of a renewables based future.

How could we support an energy future that is drawing us inevitably to blackouts (demand management!)?

How can we support an energy future that is already leading to the demise of key energy intensive industries?

Of all countries in the western sphere we are uniquely unsuited to a Net Zero option.

We are an island, with no way to import energy when we need it. I also don't like our chances of being able to import from Victoria and Queensland, when they are also short of electricity.

We have a huge land area with a widespread population requiring billions of dollars of new transmission infrastructure.

That population is small and will be unable to afford the inevitable massive cost overruns that are characteristic of Government projects.

You would not pick Australia as a test-bed for EVs – distances and charging opportunities for starters.

The topography is flat, entirely unsuited to further Hydro.

We are geothermally stable.

We will remain a nuclear free continent.

Hydrogen is a dream.

Offshore wind is an unaffordable option, both financially and politically.

What options are we left with apart from wind and solar to solve a problem more and more people, world-wide, are unconvinced about?

Plant trillions of trees?

Gas? Engie has a commitment to gas in South Australia. Smart.

Coal will remain a key component as commonsense prevails. Engie may well rue the day it blew up Hazelwood.

The situation is changing in our sphere. Note the EU about-face this week on Agriculture policy when confronted by a tractor or two. Obviously an energy project not in the public interest.

Your contribution to this change is best shown by rejection of the HOGwf

Thank you

Marguerite Gardner