

Submission to IPC from NAD-12 Hills of Gold Wind Farm SSD-9679

Summary of objections and issues:

- Clarification of access to the project site
- Protection and preservation of Morrisons Gap Road
- Overall visual impact: significant change of character of the ridge line
- Omission of NAD-12 from Visual Advice - Independent Expert Review
- Impact agreements and existing vegetation screening
- Request to remove additional turbines
- Conditions for Decommissioning
- Early timeframe to be operational is tenuous claim by the Department
- Haulage Route: confusion and contradiction
- Question of necessity
- Cost-benefit analysis
- Is the risk worth it?

Refer to details on the
following 6 pages



Clarification of access to the project site

With reference to the relevant sections in the Assessment Report the proposed access routes to the project site are very confusing. This confusion was endorsed by the Tamworth Council engineer in his presentation to the IPC public meeting in Nundle on 1 February 2024. Together with his expertise and his extensive consultation with the Applicant the council engineer was unable to specify not only if there was a workable access but which vehicle types would use which route. No wonder mere mortals are confused trying to interpret the Applicant's documentation.

Conditions of Consent must specify the main route to the site as the western access via Crawney Rd, together with clarification that this access includes a workable road for general vehicles plus a transport corridor for turbine blades, other components and OSOM vehicles.

This aspect of the project cannot be glossed over with glib references to being resolved in "the later design phase". Please note that 40 of the 47 turbines, together with additional infrastructure, are located at the western or Crawney end of the project. The Conditions of Consent are too flexible in permitting the Applicant to select any transport route dependent on "the later design phase" or undefined other reasons.

***A large scale project such as this
wind farm should have its own
purpose built access.***

Protection and preservation of Morrisons Gap Road

if the project is considered for Approval, the DPE should consider insertion of conditions to ensure vegetation removal is minimised along Morrisons Gap Road.
Independent Expert Review by OHD

Table 7-2 - The Applicant's Haulage Route and Road Upgrades make several references to road upgrades as such: "Upgrade as necessary to proposed sealed standard". This very open clause provides no protection for native vegetation in the road corridor and no clarification whether upgrades may involve work outside the corridor.

The extensive retaining walls for the widening of the corner at NAD-12 on Morrisons Gap Rd were rejected by Tamworth Council yet the Applicant is indicating that widening can now be done without the need for retaining walls on NAD-24 side of the road.

A wind farm project of this size should not mess up scenic Morrisons Gap Rd but should have a dedicated, purpose-built main access with entry from Crawney Rd and continuing up the ridge line within the project zone.

Overall visual impact: significant change of character of the ridge line

Appendix K

Visual Advice - Independent Expert Review by OHD

4.1.7 Changes in Landscape Character of an individual LCU do not form part of the assessment criteria in the VAB Visual Performance Objectives. The effect of the turbine array on the extended ridgeline of the Great Dividing Range which is as a Key Landscape Feature within the broader landscape will partially industrialise the character of LCU 05 'Forested Mountain Ranges'. The resultant change of character to a combination of Natural Appearing and Wind Energy Character is significant. This proposed change will be critical to the ongoing community perception of the value of the surrounding Landscape. The effect of this significant change of character should be carefully considered in the evaluation of the overall Project suitability and determination of Development Consent.

The above extract from the OHD Review supports the serious concern that the eventual overall visual impact has been under assessed. Only after construction, when it is far too late, will the absolute dominance of the structure along the ridge line be apparent to all.

Photomontages and wire frames cannot prevent what will become a common refrain in Nundle - "Why weren't we told they would be so big?"

In the Executive Summary of the Report the Department acknowledges that; *the wind farm with the recommended reduction in turbines (i.e. 47 turbines) and associated infrastructure would still be visually apparent, however this layout would meet the objectives prescribed in the Visual Assessment Bulletin as it would not dominate the existing visual catchment.*

The Department seems to be accepting the Applicant's visual assessment over and above the assessment of the Independent Expert Review. It's understandable that with visual assessment of this type - with regulations and guidelines in the Visual Assessment Bulletin - there will be conflicting outcomes. Much of the visual assessment process involves highly subjective decisions. Essentially it's a matter of an expert's opinion against yours, mine and anyone else.

Omission of NAD-12 from Visual Advice

Assessment for NAD-12 is not included in 3.1.4.1 Morrison's Gap/Barry Road Cluster Table. When notified of this problem, OHD apologised to NAD-12 that comments on the impacts at NAD12 are an omission from the report.

NAD-12 appreciates followup by OHD which indicated that DPE did not require an update to include NAD-12 in the Independent Expert Review as DPE was satisfied to use the Proponent's LVIA for NAD-12.

Perhaps this is a weakness in the process whereby DPE is willing to use the Proponent's LVIA instead of the Independent Expert Review.

Adding to the confusion is the fact two neighbouring properties were given the same number 12, with one being **associated** and one **non-associated**.

NAD-12 is concerned that in some instances NAD-12 has been assumed associated instead of non-associated.

Impact agreements and existing vegetation screening

Despite the very close proximity of turbines to NAD07, NAD08, NAD11 (see Figure 7) and NAD12, existing vegetation screening resolves visual magnitude objectives. Page 32 Assessment Report

Without consent or agreement NAD-12's existing vegetation screening assists the Applicant with visual impact compliance for seven turbines - 64 to 70 - all under 3 kms from NAD-12. T69 is just 1.38 kms away - far too close, certainly not fair and reasonable without a neighbour impact agreement.

Refer to the draft Private Agreement Guideline and Draft Benefit Sharing Guideline issued by the Department of Planning in November 2023.

The Commissioners are requested to consider a Condition of Consent for retrospective neighbour impact agreements to be negotiated at any time during the life of the project for the non-associated residents within 3.1km of a proposed turbine location.

Request to remove additional turbines

Seven turbines - T64, T65, T66, T67, T68, T69, T70 - should be removed from the project because:

- T64 to T70 are under 3km from NAD-11 and NAD-12
- T64 and T70 are approximately 72metres from Morrisons Gap Rd corridor
- The cluster of seven turbines presents an excessive dominant visual impact on the public road corridor
- T64 to T70 are marginal when operational restrictions are considered

Conditions for Decommissioning

At the concluding session of the IPC public meeting in Nundle the Commissioners showed genuine concern for decommissioning with questions directed to the Applicant. The response from the Applicant seemed to suggest that Conditions of Consent rely entirely on the "good word and reputation" of the Applicant with no real guarantees for responsible decommissioning practice. The Bowmans Creek Wind Farm SSD-10315 Statement of Reasons for Decision, issued 6 February 2024, includes three conditions which hopefully will be included for the Hills of Gold Wind Farm:

- Decommissioning and Rehabilitation Plan
- Robust rehabilitation objectives
- Ensure that sufficient funds are held for decommissioning

Early timeframe to be operational is tenuous claim by DPE

In the Executive Summary of the Assessment Report the Department makes the rather tenuous claim that the wind farm "would connect to existing transmission lines with capacity which may allow the wind farm to generate renewable energy earlier than other projects".

In the 6.1 Overview on page 21 the Department acknowledges that the assessment process has been "protracted and very difficult" for a range of reasons. This conflicts with the belief that this project would be operational earlier than other projects. The history of delays throughout the application process for this wind farm has destroyed confidence in any associated timelines, particularly those proposed by the Applicant.

Haulage Route: confusion and contradiction

BIODIVERSITY Vegetation Clearance

B22. The Applicant must not clear any native vegetation or fauna habitat located outside the development corridor. (Conditions of Consent page 12)

Haulage Route and Road Upgrades (page 34-35) is very confusing.

- Barry Road (at Devils Elbow) - Upgrades required to allow access for heavy and OSOM vehicles
- Barry Road intersection with Morrisons Gap Rd - Upgrades required to allow access for heavy and OSOM vehicles
- Morrisons Gap Rd - Upgrade as necessary to proposed sealed standard.

Please Note: no mention of OSOM vehicles on Morrisons Gap Rd and no mention of protection of native vegetation or fauna habitat in the road corridor which is outside the development zone.

Question of necessity

There are a significant number of wind farm projects proposed, with over 20,000 MW nameplate capacity in the planning assessment pipeline in NSW. Page 33 Assessment Report

The acknowledgement by the Department that there is a large number of wind farms in the “planning assessment pipeline” raises the question of just how necessary and essential is the Hills of Gold wind farm?

It seems that the NSW Government is spoilt with choice concerning wind farm developments. There are so many conflicting issues with this particular project, its approval should not be required.

Cost-Benefit Analysis

At what point is this project no longer viable? The Applicant should be required to update costs to allow for the reduction from 64 to 47 turbines, a loss of 108MW from the original projection of 390MW representing a significant reduction in generating capacity.

Conclusion: is the risk worth it?



No amount of decommissioning and rehabilitation can remove the 47 massive concrete turbine pads which will become permanent elements in the ridge line thereby creating unknown consequences for time immemorial.

Compare the pair!

The Executive Summary in the Report states the HoGWF would still be *visually apparent* and *it would not dominate the existing visual catchment*. So much depends on how and where you look at it.

Image on the front cover of the Hills of Gold Wind Farm
State Significant Development Assessment Report (SSD 9679) December 2023



Does this image appear anywhere in any of the visual documents on the HoGWF or just on the cover of the Report?
Showing turbines on low open country, this image misrepresents the Hills of Gold Wind Farm.



Photomontage 14 from Appendix F LVIA App D PM 14-15-16
Environmental Impact Statement for Hills of Gold Wind Farm

Change of character for the Hills of Gold

This proposed change will be critical to the ongoing community perception of the value of the surrounding Landscape. The effect of this significant change of character should be carefully considered in the evaluation of the overall Project suitability and determination of Development Consent.

Appendix K Visual Advice - Independent Expert Review by OHD



App F LVIA App D PM 01: Proposed View - 60 degree Field of View