, object to the Hills of Gold Wind Farm (SSD - 9679).

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Together with my wife, Liz, I am the owner of Mountain View Road (NAD\_69). We bought our property in 2010 and have spent the subsequent years and significant effort and investment transforming our property into our home and an expanding beef cattle operation. We have relocated our lives from Sydney to live full time in the area, have two children in the local school, and continue professional occupations whilst contributing to the local economy.

We selected the Crawney community to live in for the many reasons, including the expansive and spectacular landscapes and views, tranquillity, waterways, productivity of the soils and land and the beautiful and abundant wildlife. In many ways this project is at loggerheads with the sustainment of all these aspects of the area. Over the past many years all the concerns and issues with this project have been raised via countless submissions. This submission seeks to capture our concerns as individuals and more broadly for the Timor/Crawney community.

My concerns about the proposed wind farm are both personal and community driven.

- 1. Our home was built in a spectacular location, at a height of 730m, commanding 360-degree views of the surrounding ranges. The house was constructed to capture the view to the North which incidentally is where the project will be proposed. Due to this elevated location, and the height and footprint of the proposed turbines, the visual impact at our property will be significant. Appendix K 'Landscape & Visual Assessment' provided to the IPC by the Department, confirmed that the turbine array along the ridgeline of the Great Dividing Range will dominate the landscape. In particular it is stated that for our property (as well as NAD67 and NAD72) "the topography, potential use of the property curtilages, direction of the view catchment with potential screening limitations, all combine to result in <u>residual impacts that do not appear justifiable or manageable</u> with the proposed vegetative screening and within a reasonable timeframe".
- 2. The secondary mitigation proposed by Engle is to provide vegetative screening which has been suggested to provide screening of any potential impacts in 5-7 years of plant establishment. This proposed planting would not occur until after construction of the project. What this mitigation fails to appreciate is that vegetative screening is neither reasonable nor feasible due to the presence of overhead powerlines, underground telecom infrastructure, poor soil types in the planting area, and the topography of the land. Furthermore, any planting which could occur to the north of the dwelling would need to reach heights of 50m or more to function as screening - the existing established trees are no more than 20m in height and have been at the location for over 30 years. Perhaps the proponent should suggest we plant sequoias? Even in the case that any planting of trees or screening could occur, this would prevent us from enjoying the views for which our house was designed to capitalise upon and the views that give our lives and our property it's unique value. Through the process the NSW Department of Planning visited our site and indicated that

screening simply will not work. We wonder why this project continues to entertain screening as a viable option.

- 3. Despite the significant potential impact of the project, the proponent has <u>failed to provide accurate or sufficient montages</u> to fully understand the magnitude of the impact. No montages have been produced which provide visualisations of the proposed turbine array at night, nor of the glow from the proposed sub-station. This is indicative of the insufficient, unsympathetic, and opaque consultation that we have experienced from the proponent.
- 4. As shown in the diagram below, the southern end of the proposed project site has been severely impacted by bushfire as recently as 2019. As the image taken from our bedroom shows, a 5km wall of fire started by dry lightning strikes traversed the range to the northeast of our property. Aerial firefighters were deployed against this fire front, in large part resulting in our own and neighbours' properties being left untouched. The proposed turbine array and related sub-station infrastructure function as <u>impediments to aerial firefighting</u> in the event of future fire events, which as is well documented are increasingly likely to occur in a warming climate.



- 5. I share the broader Timor communities' concerns relating to soil and water, and the insufficiency of the assessments conducted on the southern side of the region in this regard. In multiple community submissions serious concerns have been raised about <u>risks of erosion, mass land movements</u> and landslides and inadequate sediment controls. The potential severe impact to the Isis River, springs and streams is particularly pertinent and concerning for our family as a primary producer that relies on these water sources, as well as subterranean water sources, for stock and irrigation.
- 6. I hope that the IPC will have amassed multiple points of evidence showing the unsuitability of the proposed site for a major renewable's infrastructure project. I would draw attention to the following:
  - a. the lack of access secured by the proponent to the proposed project area, and that the proposed access option is subject to a Native Title Claim and is on a Crown Reserve.
  - b. Within the proposed project site, soils are classified as Class 8 soil. Class 8 soils are defined by the Office of Environment and Heritage land and soil capability assessment scheme as "Extremely low

capability land: limitations are so severe that the land is incapable of sustaining any land use apart from nature conservation. There should be no disturbance of native vegetation." Recommended usages of Class 8 soil land are restricted to those compatible with the preservation of natural vegetation, including water supply catchments, wildlife refuges, National and State parks, and scenic areas. Significant infrastructure works as contemplated by this proposal could have catastrophic implications for the local area, linked to my point five above.

- c. The proximity of the proposed project site to Ben Halls Gap and Crawney National parks.
- d. The impact to high biodiversity values in the region. 190.54 ha of native vegetation will be removed which will cause serious direct and indirect impacts to listed threatened flora and fauna species and communities and impacts to birds and bats through blade strike, habitat loss and barotrauma. This location is home to the rare Eastern Quoll, Koala, bat species, Wedge Tailed Eagles and countless other bird species, these animals are all present on our property and no doubt within the project location. These habitats need to be safeguarded against disruption and industrialisation.
- 7. Should the project somehow overcome these obstacles and proceed to construction, I am genuinely concerned about the lack of any details within Engie's Amendment Report relating to the future Decommissioning of the project. Engie's EIS stated it would leave in situ the below ground infrastructure including the turbine handstands, which amount in the order of 49,000 cubic metres of concrete. There must be the requirement for the removal of below ground infrastructure included in the Rehabilitation Objectives. If the aim is to restore the site to its native vegetation, then that is a forested landscape. Per the DPE Consent Conditions B49, they indicate that there will just be trigger objectives when the time comes, rather than a formal decommissioning bond. This provides no certainty to the community but asks us to trust a foreign-owned multinational to deliver on their requirements to rehabilitate. Engie's record in this area does not inspire confidence, e.g. the current Victorian Govt process relating to the Hazelwood Power Station project.
- 8. Finally, and in conclusion, the Hills of Gold wind farm <u>does not have social licence</u>. Engie's planning and assessments are inadequate, flawed, unscientific, poorly referenced, or simply not even done. Whilst they no doubt will provide evidence of the volume of community consultation they have delivered, including with myself, this does not provide a flavour of the 'substance' of that consultation. My experience has been that Engie have not sought to understand our specific issues relating to the project, in fact they did not about the existence of NAD-69 until we personally brought it to their attention. They have not been responsive to either direct requests, or in providing their input to the DPE's evaluation process. They have consistently told, not asked, and they have instead relied on offering increasingly large sums of money to buy our assent. This is not an approach which allows for building and sustaining acceptance and support

from community, and so it is no surprise that there is a significant volume of community objection, including by Tamworth Council.

I request that the IPC rejects the application for the Hills of Gold wind farm.

If a decision is made to approve, the following conditions of consent should be applied:

- Condition of Consent B21 (b) (iv) needs to be amended and strengthened to include "avoidance of impacts on the quality of water flowing into the Chaffey and Glenbawn Catchments AND the Isis River."
- Condition of Consent added to B21 (b) to include "avoidance of impacts on the quality of water flowing into Perry's Creek, Pages Creek, Dead Eye Creek and Whites Creek" to protect the interests of the Isis river communities.
- 3. Condition of Consent for removal of six turbines due to significant visual impact which cannot reasonably or feasible be mitigated by secondary measures. Remove WTGs 16, 18, 21, 25 and 26.
- 4. Condition of Consent for removal of seventeen turbines, as indicated by DPE report, due to non-compliance with visual, noise and biodiversity guidelines be upheld. Remove WTGs 9, 10, 11, 24, 28, 42, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63
- Condition of Consent for removal of seventeen additional turbines due to critical concern about proximity of turbines to important habitat features (tree canopies, hollow bearing trees, and the BHGNR) and the resultant threats to bat and birds. Removal of WTGs 6, 9, 16, 18, 21, 22, 32, 33, 40, 42, 43, 49, 50, 51, 58, 59, 61. - as posed by BCS and NPWS in the DPE report point 206, page 63.
- 6. Condition of Consent should state that a suitable and meaningful decommissioning bond must be instituted which starts at the commencement of construction and continues throughout the operation of the project ; the "within 18 month timeframe" must stand firm as the beginning of decommissioning with a finished rehabilitation timeframe of no more than 3 years from the rehabilitation commencement date; all rehabilitation objectives should remain firm and not be able to be waived by the Planning Secretary; additionally all the underground concreting and other underground infrastructure must be removed to enable the restoration of the development site to its natural vegetation and landscape value.
- 7. Condition of Consent should state that if no traffic relating to the construction or continued operation of the turbine project use the Timor/Crawney Road to access the project. This is a quiet and unused country road that is not designed to support heavy daily traffic loads.
- 8. Condition of Consent actual noise and vibration testing assessments be completed with complete transparency to results and data at all premises that are impacted. Any results that show even minor noise and vibration impacts by any potential turbines should result in removal of those turbines creating an impact. The submission presents the case that our premises will not be impacted by noise and vibration. Our premises will sit in front of almost 30, 230-meter-high turbines. When, and if, these are in operation in concert, we are confident that the sound impact will be significant. We do not want this and the impacts that sound and vibration can cause to occur.

- 9. Condition of Consent At the southern end of the project there are a number of turbines that sit directly between our house and the sunrise in the East of a morning. These are turbines 24, 25, 26, 28,29,30, 32 and 33. There has been no assessment as to the impact this will cause. We do not want any blade flicker occurring at or into our house because of these turbines blocking our morning sunrise. As such we would seek that these turbines are removed from the project so that this is not an issue.
- 10. Condition of Consent The night sky at our property is spectacular and currently does not have any interruption from any premises or industrial activities. This is an important part of our lives, and the value of the property to us and others. As a condition of consent, we would appreciate that our night sky remain uninterrupted by any lighting and in particular the proposed night lighting that will appear on every turbine. As it stands this project will turn an uninterrupted night sky into greater than thirty coloured lights flashing intermittently throughout the night.
- 11. Condition of Consent Visual impact assessments be completed from 1670 Timor Crawney Road. This property is owned by us and has a dwelling on the property. From this dwelling numerous turbines will be visible and yet no visual assessment has been completed, the dwelling has been ignored, we suspect because it is some hundreds of metres outside the 'blue line' area. Despite being outside the area, the premises is significantly visually impacted, and an assessment should appropriately be completed with those turbines effecting the dwelling removed from the project. These would be turbines 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 and 18.

The last 6 years have been extremely stressful for many of the local community members who will be affected by this project. We have spent countless hours preparing submission after submission highlighting the inappropriateness of this project and suitability of this project to the area. This stress is not something we asked to have in our lives, it has been forced upon us by a multinational organisation seeking to profit from a project that will send revenue and profits into an overseas economy.

In every case we have submitted our objections within and on the dates specified by the NSW Department of Planning and yet the proponents have been afforded time to review all the objections and then resubmit their proposals repeatedly. Despite this the current submission continues to have countless flaws and issues that render this project unfeasible.

Based upon the actions of the proponent and the years that this project has been under review; the review process and its reform are critical. Australian communities should not be exposed to the stress and dismantling impact that poorly managed projects such as this have. These projects should have clear governance and approval gates that need to be met in a rapid timeframe. If these are not met the project should not continue and vibrant and progressive Australian regional communities should not need to be exposed to the stress that these projects create. The time that this project has been under review is a strong indicator of the project's unsuitability and unfeasible nature. Government arbitration and alignment of projects with Government policies around land use, location within Renewable Energy Zones, and rapid assessment processes are a step towards protecting Australian communities. This project has had none of the guardrails required to offer some assurance and a duty of care to those most impacted. To a degree it is embarrassing to Australian citizens impacted by this project that the Government allows this to occur and that projects like these are not curated and aligned with clear government policy.

If this project is approved it will be testament to the Australian and State Governments willingness to approve state significant infrastructure projects that take away from Australian Society, damage our origins and heritage, destroy our landscapes and natural ecosystems, and create headwinds for local government and the communities they serve. There needs to be a strong approval and review matrix established for the continued assessment of these projects by state and federal government, without this these projects will generate ongoing nationwide issues for which there will be no recovery.