

Our property is identified as NAD 76, just over 8km from the nearest wind turbines 63, 62 and 68.

The visual impact of Hills of Gold Wind Farm is a concern because it will reduce our enjoyment of our house and garden, and travelling on roads around Nundle and Hanging Rock.

As a resident and store owner in Nundle I have been collecting unsolicited anecdotal data of people's responses to the place for over 25 years. The greatest number relate to the unique situation of the town in its own valley, which you can easily comprehend on approach from the west. The sweep of the mountains from the Hanging Rock, around the top of Nundle Creek, the Peel River and Wombramurra Creek is a simple panorama. That is the marketing 'money' shot for visitors, and 'home' for returning residents. Throughout the assessment process the application of narrow visual parameters relating to individual residences, or the main street of Nundle, have obscured the larger cumulative impacts of the project. The steep 600m rise of the ridge from the valley floor with no intervening topography makes it visually much stronger than the ground distance implies.

O'Hanlon acknowledges that the broader landscape character will be significantly impacted, partially industrialising the range. Yet DPHI disregards O'Hanlon's assessment and recommends approval of Hills of Gold Wind Farm.

There is, no doubt, political pressure to approve wind farms, however there is also public expectation of a just transition to renewables. Certainly approval outweighs the political costs of rejection for the NSW Government, but we would do well to be cautious in spruiking the capital costs of private infrastructure projects designed to deliver electricity to NSW residents.

2023 has been revelatory in establishing the close relationship between fossil fuel prices and capital investment costs for renewables. The lack of detail in the assessment, particularly in the area of constructability and access in steep, complex and sensitive terrain and the fact that project cost estimation has barely changed since 2018 in spite of considerable redesigns and a radically changed economic and global environment, should be of deep cause for concern for the NSW Government and its obligation to deliver value for money and affordable power to residents.

Given the near certainty that the best laid plans will be subject to considerable variations once the first sod is turned, particularly on this site, are potential costs of \$1 billion + a reasonable risk for a 282Mw project? The US Department of Energy aims for AUD\$2300/kw installed for onshore wind. The high end on Hills of Gold WF could potentially be AUD\$3500/kw installed.

With larger projects on the table at nearer to half that amount and with the whole range of particular community, siting and biodiversity concerns not adequately addressed the public benefit argument doesn't appear particularly strong.

Engie representatives at the IPC public meeting hinted at the competitive pricing challenges posed by 47 turbines, implicitly as an argument for reinstatement of deleted turbines. Again, in the face of the considerable concerns brought up throughout the development process,

removal of a further 47 turbines would be in the public interest. If, in the words of the DPHI , the removal of 17 turbines doesn't seriously impact the NSW energy transition, then the further removal of 47 marginal, economically uncompetitive turbines with high community and ecological costs shouldn't either.

Our community has participated in every stage of the assessment and the local majority has not been listened to. Soil science has not been listened to.

The DPHI has ignored genuine concern on the part of respected soil scientists and its own Biodiversity Conservation Directorate that point to an underestimated environmental footprint for internal tracks. Soil scientists Chapman and Banks warn the government that this project is a risk to society. Tamworth Regional Council has dedicated extensive resources to communicating its objection to a project in an unsuitable location.

Australian Energy Infrastructure Commissioner Andrew Dyer has visited the site and met twice with members of Hills of Gold Preservation Inc. The Community Engagement Review released this month makes recommendations for improving the way renewables sites are selected, and revising planning and approval processes. It is not hard to recognise Hills of Gold Wind Farm as a Case Study highlighting poor process.

A major concern is the proposal for smart curtailment of turbines. There will be no curtailment of turbines because there will be ineffective monitoring of bird and bat carcasses. Dead animals will be scavenged before being found by trained detector dogs, if available. Monthly carcass searches will be a useless indication of bird and bat strike neighbouring Ben Halls Gap Nature Reserve and Crawney Pass National Park. What is the incentive to curtail if a high spot price for electricity coincides with curtailment triggers? Hills of Gold Wind Farm should be rejected because of the Transport disruption impacting two rural communities, an incomplete Transport route with insufficient detail for construction of high risk roads on highly erodible soil prone to mass movement, its location at the headwaters of three catchments, its impact on biodiversity, and a pre-existing tourism industry.