

Local Resident 25 years

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Batchelor Science UTS(Environmental)

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The merit of State Significant Development 9679 (Hills of Gold Windfarm) may be immediately and strongly discounted by the IPCNSW for the applicant's contravention of current 2016 Wind Energy Guideline and its associated Bulletins.

////////The applicant has NOT demonstrated acceptable ability, or skill, to correctly place and locate turbine infrastructure in over one quarter of the instances required by the guideline.////////

Throughout their design efforts they lack the knowledge and finesse to engender ongoing confidence in future adherence and execution of a well balanced, coherent and worthwhile state significant project./////

Seventeen of sixty four turbines placements were rejected by the assessor (DPHI) and this represents a 26.5% guideline deviation in real terms.////////

The 2016 Wind Energy Guideline clearly provides objective policy statements, objectives and measures for wind energy developers to present fair, knowledgeable, accurate and constructible proposals.////////

Failure of the applicant to adhere to clear guidance in a timely, accurate and efficient manner has been documented previously, but will remain self evident throughout this submission .////////

Criticisms The applicant has been publicly

criticised for drawing out the required amendment timeframes and delaying the provision of vital information in the assessment processes, however it must also attract criticism for dragging out the application process as a whole, creating a chronic stressor for interested local community members and the public at large. //////////////

This situation has been tiresome and consumptive for everyone. //////////////

The Director of Energy Assessment NSW notes in her address to IPC and the public 2024, that "eventually" necessary information was provided for its whole of government assessment, and that, the assessment task had been a complex and challenging one. //////////////

Chapman and Banks (2024) continue to press for truth and accuracy in geophysical, soil and landform data presented by the applicant in regard to site suitability and the project's constructability per se, including extant risk .////////

It is well within the public interest for the NSW planning process to be prompt, efficient and workable. Many person hours have been spent by special interest groups and individuals who, in the end , feel tethered and reluctantly engaged with a lengthy and intricate set of decision making protocols. //////////////

There is a lot at stake for the many objectors to this proposal and that has been a driving factor for their tenacity and endurance. //////////////

There is perhaps less at stake for supporters, excepting the land holder host's interests and development at all cost advocates.////////

Many of the objectors have consistently maintained concentration for the full term, from announcement by the initial Ma and Pa Developer to this here deliberation by the IPCNSW. Often much to the detriment of their careers, family life and health (s) //////////

Alternatives It is suggested herein that softer, more benign and more widely supported alternative sites for wind energy projects be sought for approval in NSW compared to this one . Preferably within designated Renewable Energy Zones allocated by thoughtful policy makers statewide. //////////

Alternative sites and developments can act in harmony elsewhere to contribute toward the desired mix of low emissions energy for the future good. Choosing a more suitable wind development site will go, I'm sure , somewhat toward consoling the almost fanatical support shown locally for the Hills of Gold Windfarm albeit a minority support. //////////

This alternative development, elsewhere, on gentler foundation could very effectively service the 150, 000 homes this project is purported to have the capacity and / or need to power. Finding an alternative site would be no significant loss to current efforts to attain net zero by 2050, some quarter of a century hence. //////////

In other words alternative sites could further help achieve low emissions policy

into the future with less implication for the environment and peoples in unique and valuable places like that of Nundle Hanging Rock , Timor and Crawney.////////

Merit This proposal as it stands lacks the merit for approval in terms of unacceptable biodiversity impact, transport and engineering constraint plus visual, noise and amenity concerns voiced by many over six years //////////

Other issues cited by detractors and independent outside assessors include dominance of the landscape character and integrity beyond merely the "apparent", and, the socio /psycho / economic issues associated with large scale prominent industrial developments imposed upon scenically valuable and naturally rich localities.//////////

Transmission The DPHI's public submission at the most recent IPCNSW meeting at Nundle suggests that the Hills of Gold Windfarm can connect to new power transmission infrastructure associated with high voltage delivery for NSW quite easily and will be at a distinct advantage because of it ////////////

There is no existing transmission infrastruon from the proposed project boundary to the necessary delivery points for high voltage energy uptake.. ////////////

This statement by DPHI must relinquish its merit or at a minimum be qualified to the IPCNSW for consideration of merit //////////

Thoroughness The panelists are encouraged to examine the preferred desktop decision making process of the assessor VS five on ground visits to the

area over the assessment period of 5-6 years.////////

This sort of visitation rate is wholly insufficient and inconsistent with gaining meaningful local knowledge and insight into a complex and physically demanding site such as this one - not to mention the rich heritage fabric the area is known for, both in aboriginal and post colonial terms.////////

In its public address to IPC meeting at Nundle 2024, DPHI states "several locations" were visited in order to provide insight into visual, noise and amenity concerns. Is this really worthy of merit in terms of comprehensiveness ? //////////

Demerits should further apply to the applicant's own passive, low intensity and shallow type of engagement style throughout the assessment period . //////////

The front of house approach taken by the applicant is demonstrable by neglect shown toward Crawney and Timor impacted receivers and the environment conditions at these localities.////////

IPC panel members visited this area and are respectfully reminded of the conditions found there during February 2024.////////

The depth of the applicant's engagement and thoroughness, or lack thereof , is itself evident by scarce mention (never, according to Eagles 2024) of the Isis River complex- it 's hydrology and its exposure to potential project influence . //////////

Eagles (2024) described water flow characteristics in the Isis and concludes activities in the creek's headwater and

catchment can and does have real consequences for reduced water clarity, increased silt suspension and therefore down stream sedimentation risk to the Isis. Further, it is observed that phosphorous rich basalt soil types such as those on site can move in suspension when disturbed long distances and contribute to troublesome blue green algal blooms and general eutrication in slack de - oxygenated sections of the waters locally (Chapman 2024).////////

Discussions and engagement with local fire authorities at Crawney Timor , were apparently non existent as well according to Eagles 2024. This is particularly surprising given the value of energy infrastructure proposed for the ridge above, and the importance of cooperation in times of emergency and need .////////

Fire Aerial firefighting efforts required for this sort of terrain are an important issue for Crawney and Timor communities but also for all the other public and private residents and infrastructure surrounding the obstacle laden project area. //////////

The notion that aerial fire fighting assaults will be restricted is worrisome for many who live and work in the immediate vicinity . Very concerning to seasoned firefighters and emergency personnel to boot //////////

It is not in the public interest to approve construction of a wind farm at this particular locale because of the high fire risk to property, stock, local infrastructure and life.

Undefendable fires do have catastrophic consequences for rural communities. //////////

Fire fighting responses must be swift around mountainous zones such as this and energy developments such as the Hills of Gold Windfarm must be discouraged wholeheartedly - we heard from Vlassoff (2024) and Tomalin (2024) regarding practicalities and contingencies at the IPCNSW public meeting in Nundle 2024 regarding fire.////////

Engineering, Constructibility and Transport

It appears within the application to be a widespread failure to provide workable solutions to site access and transport challenges over space and time . Iteration after iteration failing to impress local authorities and managers of road and transport infrastructure and for this reason it is criticised and a further demerit warranted. //////////

For a fairer outcome it is hereby suggested that closer scrutiny be levelled at the snapshot sampling and assumptive approach employed by the applicant which has informed the governing body, DPHI in its current all of government recommendation .////////

More Turbines Removed Potentially more turbines could be removed from the project layout by applying objective guidelines over the whole of the project area rather than in select localities or narrowly defined pin points.////////

We hear from distressed members of the public and landowners near the project that sampling and monitoring requests, especially for visual, noise and transport impacts have fallen upon deaf ears, consistently. //////////

Engie admits that a further reduction in

turbine numbers would affect their fiscal projection and their desire to deliver a viable and affordable offering to investors and their consumers alike. Dwindling turbine numbers mean reductions in scale and very likely an increase in electricity cost to the consumer, wholesale buyers and prospectors engaged in trading renewable energy units discouraged for buying Engie.//////////

All this eroding a perceived promise of affordable green power in this instance (T Taylor and Qurindi Aboriginal Elders 2024) and the desired driving of cost of living pressures down for those mentioned above . ////////////

The imposition of conditions outlined by Hooper 2024, Krsulja 2024, Mcglachlin 2024, Vlasoff 2024, Sylvester et al 2024, plus numerous others, can and should be used in weighing up the merits of this application. For if reasonable recommendations are implemented then the removal of many more turbines will ensue.//////////

It is encouraged that a conservative / conservational / preservational stance be adopted by the IPCNSW and a respectful but firm rejection of the DPHI recommendation be handed down unconditionally.//////////

Consistent Rejections and Objections The magnitude and frequency of changes made throughout this project assessment period were considerable , and the local government planning teams are highly critical and persistent in their rejection of the proposed development in all its guise. For good reasons and with meritorious intent. ////////////

If approval conditions and highly scrutinised restrictions are imposed and policed by the local government authorities it will most likely result in stifling protraction and delayed project delivery. ///////////////This makes for extended negative impacts for the public.//////////

Strict and open ended conditions such as those handed down by DPHI are not expected to be met efficiently by the applicant and their contractors so it can be reasonable to assume that the 24 month construction period will hardly be achievable in practice.//////////

This will hence subject local communities again to more negative impacts leading to extended social economic pressures beyond their endurance it seems to me . ///////////////

Loss of local business and tourism momentum will be grieved very heavily if the project gains final approval, with a probable exodus launched by valuable long term businesses and their families from the immediate local micro economy. This will negate influxes of construction workers and other individuals who are looked upon by supporters of the project as "welcomed saviours" - or at the very least, sources of entertainment . ///////////////

The existing and flourishing businesses and social fabric of Nundle Hanging Rock and Crawney Timor will find it difficult, if not impossible, to survive a massive energy development such as this on their doorstep. ///////////////

Resilience has already been dampened by division and angst amongst the

protagonists and If the project gains approval, conditional or not , this resilience will be extinguished completely and thoroughly, once and for all . //////////////

Reliability of data and assumptions The applicant appears to have relied upon snapshot studies and conceptual design methodologies in order to engender confidence in the assessor of the project who has recommended the approved under condition . This approach must not attract merit for the applicant and this current application up for determination. //////////////

Avifauna - Bats, Birds and Insects Limited bat behaviour and abundance sampling was undertaken by the applicant and must garner scepticism for informing of real and effective blade strike strategies going forward for 35 years .////////

Multiple turbine effects will impinge upon the blade strike risk as foraging and migrating avifauna (including Lepidopterans - moths and butterflies spp) navigate both the circular and linear nature of the risk. //////////////

Flying and gliding species too, who were shown to live and traverse the project zone will be negatively impacted over space and time for the duration if not excluded permanently. //////////////

For some 20 odd species, and their continuing abundance, it is proposed by the assessor and applicant to apply offsets and species credits.//////////

This does little for local assemblages and individuals whose survival and prospects are dyer at the local microclimate

level . //////////////

It is pertinent to mention here that the timeline of thirty five years is the minimum scientific interval for which the actual biodiversity impacts must play out .//////////////

Conceptual Design Limitations A conceptual approach to complex and challenging geophysical and limiting terrain factors for efficient and safe construction within timeframes are rigorously questioned here, and by Gill (2024) and Chapman / Banks (2024) .//////////////

The impacts associated with large scale energy production in this remote , nationally recognised locale with its perennial appeal must be considered very thoughtfully . In the interest of future generations it must be preserved - in tact . //////////////

The project as outlined and assessed lacks the comprehensive merit to warrant final approval by the IPCNSW and therefore can be rejected outright with positive outcomes for biodiversity, heritage and the high scenic value of the locality and place . //////////////

With rejection of this proposal , local morale and vitality is sure to return to preoccupation levels within the community and it can "get on " with efforts to flourish into the future . Threats to livelihoods and health (mental and physical) diminished and developer intrusion shut out for good . This is my public humble submission echoed by my immediate family. //////////////

With respect to the indigenous inhabitants and travellers of the range, past and

present, current and ancient .

Nundle 2024 //////////////

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