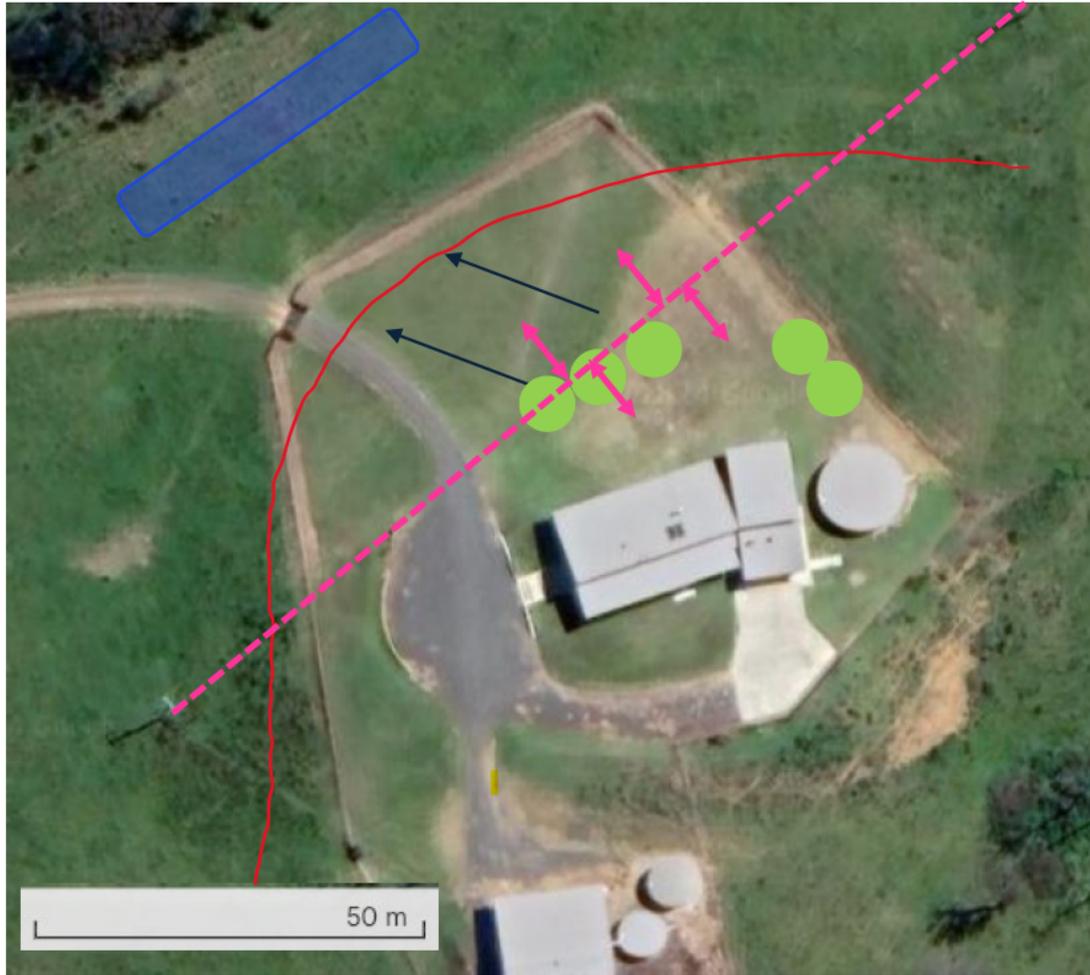


Elizabeth Watts

[REDACTED] [NAD #]

IPC Submission - Appendix

Proposed mitigation is not reasonable nor feasible



Legend:

----- Power line

↔ 10m limitation for tree planting

— Telstra line (underground)

→ Steep fall off towards existing tree line

▭ Feasible zone for planting: 8-10m drop from house

●● Screening proposed by proponent

Bushfire and related impact



Image: 30 December 2019, taken from veranda at

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

Together with my husband, Graeme, I am the owner of [REDACTED] (NAD_69). We bought our property in 2010, and have spent the subsequent years and significant effort and investment turning this property into our home and a growing 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.

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. 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 residual impacts that do not appear justifiable or manageable with the proposed vegetative screening and within a reasonable timeframe".
2. The secondary mitigation proposed by Engie is to provide vegetative screening which is likely to start reducing 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, the topography of the land, and bushfire management regulations. This is illustrated in the attached 'Appendix' (page 2). Furthermore, any planting which could occur to the north of the dwelling would need to reach heights of 50m or more to act as screening - the existing established trees are no more than 20m in height. Perhaps the proponent suggests we plant sequoias?
3. Despite the significant potential impact of the project, the proponent has failed to provide accurate or sufficient montages 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 (located between turbines 12 and 34). This is indicative of the insufficient, unsympathetic and opaque consultation that we have experienced from the proponent.
4. As shown in the attached 'Appendix' (page 3), 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 north east 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 act as impediments to aerial firefighting 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 risks of erosion, mass land movements 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 renewables infrastructure project. In particular, 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 5 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 also impacts to birds and bats through blade strike, habitat loss and barotrauma.
7. Should the project somehow overcome these obstacles and proceed to construction, I am very 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 track 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 does not have social licence. 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.

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

1. 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."
2. 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 6 turbines due to significant visual impact which cannot reasonably or feasibly be mitigated by secondary measures. Remove WTGs 16, 18, 21, 25 and 26.
4. Condition of Consent for removal of 17 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
5. Condition of Consent for removal of 17 additional turbines due to serious concern about proximity of turbines to important habitat features (tree canopies, hollow bearing trees, and the BHGMR) 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.