

Submission to IPC – Hills of Gold Wind Farm

I am a long-term resident of Tamworth and a councillor serving the people of Tamworth Regional Council.

This contentious and divisive project will create an irreparable blight on the environment and vista of Hanging Rock, Nundle and Timor. This is a proposal that a majority of the community have fought against for more than 5 years and they have been through hell during that time trying to get a positive outcome for their communities. It is important to note, they and I are not against renewable energy projects, far from it, we simply believe this proposal is in the wrong location.

Although my Council has an approved Council recommendation to sign a proposed Voluntary Planning Agreement with Engie should the IPC approve the project, no such agreement has yet been signed and Council continues to strongly object to the Hills of Gold Wind Farm and has done so on two occasions. Furthermore the Capital Investment Value of \$826.4 million based on 2020 figures, with 33 exclusions including the BESS. This is based on 64 turbines and 384MW. Now the recommended project is 47 turbines and 282MW, but no one has any idea of the impact on the CIV. There is no transparency of the value for the NSW consumer (government subsidies and impact on electricity prices) and the viability of the project considering much of the same access infrastructure will need to be built for less return due to inappropriate site selection. The payments that Council may receive over a 32 year period is disingenuous.

My Council has committed considerable resources in planning staff and councillors' time to understanding and assessing the potential impacts of this project as have many concerned residents who we represent and many concerns have not been

adequately addressed as the proponent hopes to address these after an approval is provided, putting the cart before the horse which is absolutely wrong. It is significant that this project so far is the only renewable project that my Council has objected to and for good reason.

Nundle and Hanging Rock are an environmental, economic and social asset for Tamworth, this region and the State of New South Wales.

- Environmentally it is a source of great biodiversity and natural heritage with two national parks, Ben Halls Gap Nature Reserve and Crawney Pass National Park, extensive Crown Lands recreation areas, and State Forest. The vista that residents and visitors currently enjoy will be irrevocably destroyed by this proposal. I note that the Department is aware of both authorised and unauthorised clearing, this makes the remaining native vegetation on the range and slopes even more important. It is largely bushfire prone area and the proposed clearing for infrastructure may not include additional clearing that the company would require to protect its infrastructure during a bushfire event. This will destroy more irreplaceable biodiversity and habitat for endangered species. Biodiversity offsets will never compensate for the loss significant areas of vegetation. The topography is steep in many areas and road infrastructure to individual turbines will be significant as will the clearing of vegetation will likely be greater than stated.

While there are parts set aside for farming and forestry but there are significant areas of untouched vegetation. The vista and visual amenity of the region will be destroyed for residents and visitors who will see an industrialised vista, not the currently untouched parts of the native vegetation which comprise the footprint of the windfarm proposal.

I note one of the Development Consent provided by Planning NSW was a condition to “prevent, minimise, or offset adverse environmental impacts”. The proponent has failed to demonstrate that it can comply with that condition. It is bemusing that we think we can fix climate issues with renewable energy projects that are so environmentally destructive as this project is.

- Economically, The Nundle and Hanging Rock communities are the go-to destination for visiting family and friends, Tamworth’s largest tourism segment. It plays an important role in encouraging visitors to stay one more night and increase their spend.

It does this year-round. Unlike other locations, businesses are open on weekends and public holidays and school holidays, and Nundle hosts a unique program of events from singer songwriter retreats, to The Great Nundle Dog Race, Nundle CWA Art Show, Nundle Country Picnic and more. I mentioned how divisive this project was to the community – we lost a marvelous annual Go-For-Gold Festival held at Easter that brought around 16,000 people to the village because of divisions in the community over this project.

- Socially, Nundle contributes to the liveability of Tamworth. With its subalpine climate it is our Leura/Katoomba. We love the indie shops, the pub, donuts, cabins, b&bs, free camps, Chaffey Dam/Sheba Dam for swimming, fishing and kayaking, and the snow. It is also a site and source of rich European and Chinese gold mining heritage.

Council’s Blueprint 100 states Council’s intent to protect the character of Nundle and Hanging Rock. This project will permanently industrialise the entrance to the village and the highly visible surrounding landscape day and night. The

experience of the Heritage buildings and street trees of Nundle are important to residents and visitors. This project permanently compromises the experience of the heritage village by industrialising a highly visible part of the range for 35 years.

The Applicant and Department haven't assessed important access and biodiversity issues including:

Western Site Access - from Crawney road onto the project site via Access Option B, then via Western Connector Track to the ridge towards Turbine 5.

This access is proposed for 35% of light and heavy traffic, 100% of OSOM traffic and the ONLY OPTION for blade delivery.

Governor's Shelf (Concrete Batching, BESS, Substation, Operations and Maintenance, Car Park) excluded from visual photomontages. Neighbouring non-associated dwellings and users of Crawney road and Teamsters Rest campground are unable to comment on visual impact.

The Wombrumurra Creek crossing at Access Option B is not addressed with respect to waterway crossings biodiversity, flash flooding and engineering.

Risk of underestimated biodiversity impact, incomplete constructibility advice and no visuals for infrastructure on the shelf.

Risk of underestimated environmental impacts, and no visuals shown for construction of the Transverse Track, including substantial concrete or rock batters.

Turbines next to the boundary of Ben Halls Gap Nature Reserve need to be removed to protect the world biodiversity legacy located in the park, particularly Critically Endangered

Ben Halls Gap Sphagnun Moss Cool Temperate Rainforest. A 130m setback is not enough. If we are serious about preventing extinctions and protecting world biodiversity, turbines 32, 33, 38, 39 40, 43, 44 and 45 should be removed.

Turbine #47 (E 326887.11 N 6502787.84) appears to be located in the State Forest. HOGPI previously raised concerns about the location and the Applicant replied "turbine 47 is not in the State Forest, it is on Lot 48". Lot 48 *is* the State Forest and is included in the table of involved land owners.

Who is the recipient of the income from this turbine? Who would be ultimately responsible for the decommissioning of Turbine #47?

Turbine #50 (E 325871.96 N 6504010.96) appears to be on the Crown Rd. It is not transparent how the Crown Road will remain accessible to Crown Lands and National Parks staff or emergency services. The diameter of the turbine foundation is quoted as 26 meters. The Crown Road may be partially occupied by the turbine foundation and interrupted by the associated hardstand.

Turbine #49 (E 326078.99 N 6503434.02) appears to be only a few meters from the Crown road.

Turbine foundation may be partially on the road and the road may be interrupted by the associated earthworks.

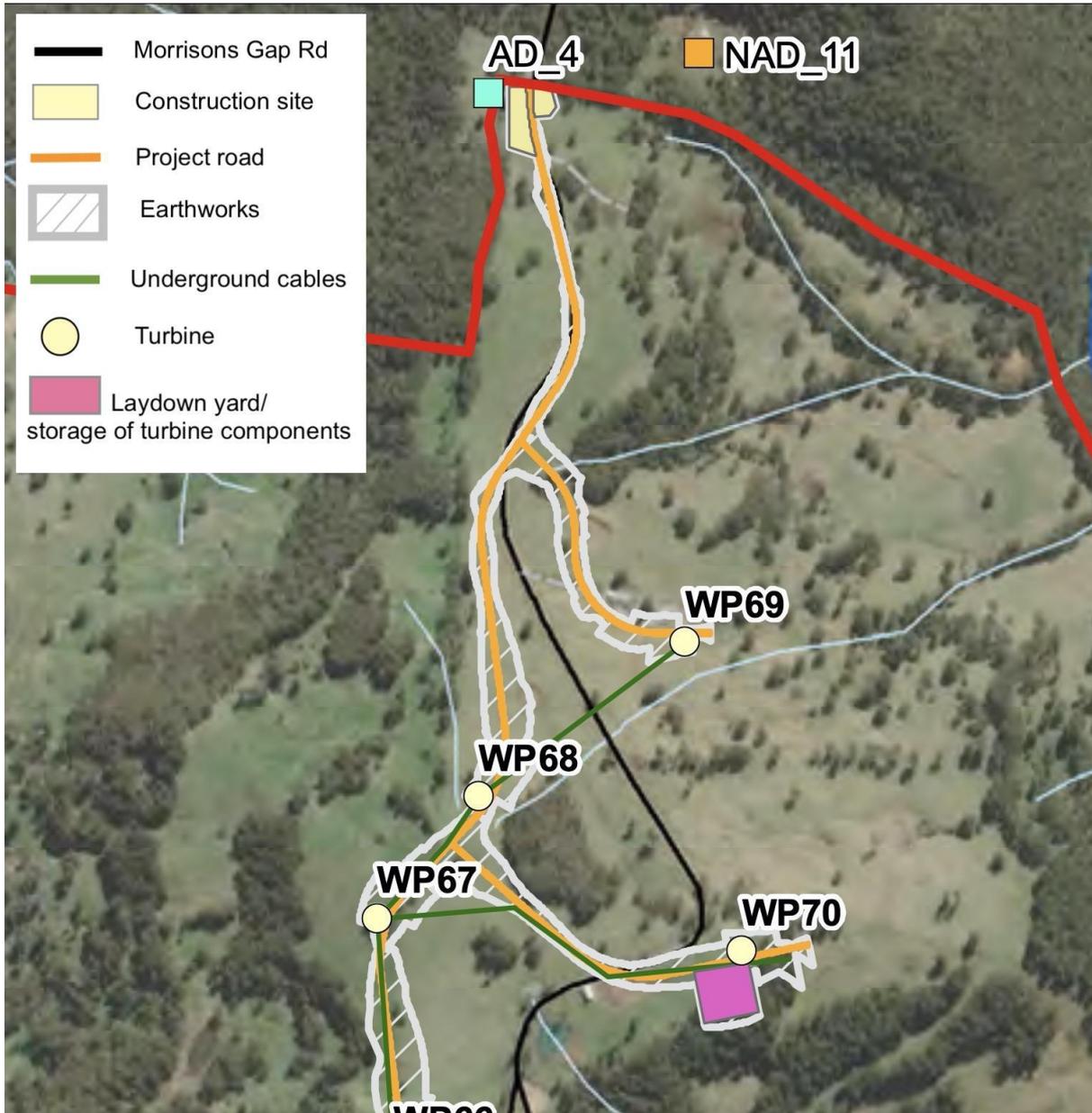


Example of turbine construction on sloping terrain

Turbines 64-70 need to be removed from the land adjoining Morrisons Gap Rd, a public road used for access for tourists to a trout farm, snow seekers, residents, and Council, Crown Lands, Forestry, National Park, and emergency services staff (SES/RFS/Ambulance). The project treats the road reserve like private property with proposed construction compounds immediately either side of the road, underground cabling and access tracks crossing the public road, and turbine foundations and laydowns, with no detail for significant earthworks.

It is not known whether Morrison's Gap Rd will be fenced and blocked to residents and the public?

The seven turbines are a risk to the driving public and a liability to Council, particularly in a subalpine area with mist and snow. There is risk of ice throw.



The public road (Morrisons Gap road) will become an industrial site.

In the Updated mitigation measures (November 2022 page C18) the following is proposed:

“The Proponent will provide UHF radios (given mobile phone reception can be intermittent) to residents along Morrisons Gap Road and Shearers Road to communicate any emergency or travel plans to site staff along with a protocol for reaching the site manager”.

Residents shouldn't have to communicate by radio to enter or exit their properties onto a public road.

100% of light, heavy and oversize overmass vehicles will travel through the village of Nundle on residential and village streets and rural roads.

65% of light and heavy vehicles will travel on Oakenville St, Old Barry Rd, Barry Rd (including an unresolved sinkhole) and Morrisons Gap Rd. There is not enough detail on modifications to Morrison's Gap Rd that could become a liability for TRC. Proposed widening to 5.5 meters in straight sections and "wider" on the corners.

There has already been significant unauthorised clearing within the project site of irreplaceable vegetation by the proponents' supporters, approval will empower proponents with similar behaviour. The proposal does not adequately address the 13km long corridor of vegetation that will be destroyed to deliver the wind power to the grid. Worse, there is no suitable remediation plan at the projects end of life to clean up the concrete and steel pads, towers or blades.

Despite money offered to landholders, 80% of dwellings within 8.7km of the project remain non-associated and that indicates how important the ridgeline and the environment is to the local community. The community has suffered socially and a Community Enhancement Fund will only create a further wedge in an already divided community. The project is not in the public interest because it currently has no access, is incomplete, high risk and is un-approvable.

Mark Rodda
Councillor, Tamworth Regional Council
1 February 2024