From: [redacted]
To: IPCN Enquiries Mailbox; IPCN Submissions Mailbox
Subject: Addendum Hills Of Gold WIndFarm - Timor Community submission
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Attachments: Timor Community Submission Addendum.pdf

IPC Submissions:

I submit as an addendum to the Timor Community submission to the Hills of Gold WIndFarm IPC, published on the 8th Feb 2024, this additional detail and video that the Timor and Isis Valley Communities presented at the IPC Public meeting held in Nundle on the 2nd of February.

Video

drive.google.com

Support Material

Thank you

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Timor and Isis Valley Communities (addendum)

Please find attached the video of the landslides, landslips, and silting of Perry's Creek flowing into the Isis River on the 19th of January 2022.

The community would highlight that this demonstrates **conclusively** the highly erodible soils both on the slopes and the ridgeline in the vicinity of the proposed WindFarm. These landslides are **conclusive proof** of the Type 8 Soils in the area as per the NSW Environment and Heritage Soil Mapping.

Engie, their Consultants, DPE and their Consultants, have glossed over the NSW Environment and Heritage Mapping of the area and its highly erodible soils. Instead they have relied on their own inadequate, inaccurate, cursory analysis. Why?

The DPE and their proponents' desperate desire for this project to proceed, should not be an excuse to allow them to just turn a blind eye to the seriousness of this particular issue and its consequences.

The Assessment by DPE is based on flawed consultants assessments, and therefore the DPE recommendation is Wrong and therefore should be rejected.

The wash away of the supposedly well planned, UHSC Merriwa-Willow Tree Road, across the Great Dividing Range, on similar Soil types, should give the Commissioners serious cause for concern, in regards to the fragility of this inadequately assessed proposal.

Constructability, Soils and Water

The DPE's confidence in its assessment on soils and water impact is misplaced and has therefore placed enormous risks on the community. This development cannot be given consent with all the gaps in soil, water, hydrology and constructibility that have been assessed and taken into true consideration within the reports by Greg Chapman and Dr Robert Banks (commissioned by HOGPI). Some of the serious concerns highlighted by these experts include:

- No project assessments address hydrology impacts
- Rainfall is underestimated and no assessed forecast of impacts of climate change and changed rainfall events has occurred
- Downstream flow impacts have not been considered - this development site will directly impact the origin and multiple water courses to 3 river systems - the Peel, Isis and Barnard. - Contour maps have not been used to make proper accurate scientific assessments, even though they are available.
- No underground water flows have been considered and these are what keep the streams flowing when there is no rain, during our increasing and more severe droughts. - The impact of massive land clearing in addition to concreting and hard stands negatively affecting the natural soil absorption
- No geotechnical data, only interpretations, for construction

- The assessment ignores mass movement instability and the huge erosion potentials - There is no assessment of blue green algae blooms - phosphorus release from sediment - resulting in smothered aquatic habitats as a result of erosion and inability to use proper sediment controls on steep slopes.
- No assessment on the disturbance on slopes over 30 degrees for 5 km stretches over a 30 year life span of this project.
- Sediment basins cannot be built (as a mitigation) on much of this site - they need to be on flat land, not on shelves or slopes/cliffs. The weight of the water held in the sediment basin would itself then propose a further significant risk of collapse and landslip.

DPE commissioned an independent report on Constructibility, Soil and Water by PSM, published in December 2023. Some of the results were:

- no information provided on the impact to water courses and downstream impacts from construction to the 14 first order ephemeral water courses located in the footprint. - 17 WTGs (WTGs 3, 5, 6, 8, 11, 12, 15, 16, 17, 18, 22, 32, 40, 42, 50, 60, 61, 64 & 66) occur in terrain with existing slopes greater than 20 degrees and of these 6 WTGs are on terrain at/and or above 30% (WTGs 5, 6, 12, 18, 40 & 42) (page 8)
- **Point 6.2 states when Foundations are on slopes greater than 25 degrees, "typical erosion mitigation measures described in EIS are unlikely to work in these areas".**

- **Point 6.3.2 states the following:**
- Approximately 33% (10 km) of Access Tracks are located in areas where slope of existing terrain is steeper than 20 degrees and present high erosion .
- Approximately 17% (5 km) of Access Tracks are located in areas where slope of existing terrain is steeper than 30 degrees and present very high erosion potential.
- Over 60% of the Transverse Track (TT) traverses areas where existing terrain slope is steeper than 20 degrees
- 40% of the TT traverses areas where the existing terrain slope is between 30 degrees and 50 degrees.
- The approaches to manage drainage and erosion will result in a large amount of excavated material which "… will need to be removed ..reused…or disposed of away from the Project**. As far as we can tell, there are no allowances for "fill**

emplacement areas" as part of the application.

The Constructability of the Transverse Track (TT), over 6.5km, remains of high concern. It is assessed that a 15-20m high embankment may be needed across valleys with slopes of 28-40 degrees and across 2 deep drainage paths for sections of this TT. Further, the Constructibility advice outlines that 40m-60m long batters would be required. **Once again there is limited design and construction details to address these steep batters, earth works, erosion mitigation, surface water and creek presence.**

After these figures the **PSM Report states on page 17 that " …given the lack of detail regarding the specialised erosion and sediment control measures, and the relatively large extent of the Project to which such measures may apply, we consider that this is a meaningful gap in assessing the impact on soil and water resulting from the Project. The EIS provides insufficient details to allow independent confirmation that the assessed disturbance footprint is sufficient to allow for the necessary specialised erosion and sediment control measures to be implemented in the areas of steep ground and particularly the TT."**

It should have been that this prompted the rejection of this development but at this late stage, after almost 6 years and multiple reports by Engie, **the DPE gave Engie yet another chance to provide answers to information provided to them - note this is not information they researched, understood or considered themselves at all!.**

The resultant answers which apparently gave PSM (and ultimately the DPE) "increased confidence" basically say that the necessary specialised mitigation measures "can be developed" in future design phases.

The answers provided by Engie under section 8 of the PSM Report are a master class in management speak and do not provide any actual information at all - everything is still thinking of a plan or a concept.

Engie will provide " a description of a process for design development"

Engie will provide " plans showing development of design alignment from early EIS to a more detailed concept stage"

Engie answers that " The EIS development footprint is "representative" of the likely final disturbance footprint…However the actual alignment is unlikely to fully coincide with the Development Footprint" ***= nothing certain now about where this project is sited***

There can be no confidence in the information provided by Engie on Constructibility, Soils and Water. The DPE's additional review by PSM exposed the continued concern about the location of a wind farm on a mountain ridgeline and its steep slopes, on Class 8 soils, with high erosion and landslides.

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.

The response by Engie provides no detail - just thoughts about what plans they could look to design. After 6 years and these issues raised from the beginning this is unacceptable. The risks that DPE are exposing the environment and the community to, are unacceptable. Their Consent is based on accepting that Engie may develop a design in the future.

The DPE assessment says they feel satisfied that Engie can manage the significant erosion and sediment controls - they are not available now but will be produced by Engie during the "detailed design and construction phase! So how such an assessment could possibly be made is unthinkable! The bearers of the ensuing risks and the dire consequences all fall on the local communities and they are severe and irreversible.