

SSD 9679

Hills Of Gold Wind Farm

ReD4NE Submission to IPC Planning Commission

2 February 2024



- Introduction – and summarises key points we wish to pursue in a written submission
- ReD4NE is an incorporated Community Group coordinating across 11 other groups in the New England <https://red4ne.com.au>
- ReD4NE is very familiar with the Hills Of Gold Wind Project -it has monitored progress through the planning system.
- Our fundamental position is one of objection to the Hills of Gold Wind Farm – we believe it presents poor site credentials – confirmed by the six or so years its languished in the development phase –the fact that it wasn't included in REZ
- Essentially its poor site selection –it has struggled from the getgo from wrong location – a basic site inspection confirms
- It conflicts on a number of critical environmental and socio-economic fronts

TRC – Push Back

- ReD4NE deals on behalf of communities, with originators - developers – investors - governments and LGAs
- LGAs all take varying positions on renewables – most operate as financially fragile so VPAs and other benefit incentives from Developers can often be the lure to dance with development. Some developments are responsible and offer benefit over detriment and should be encouraged.
- However when a major LGA such TRC **object** and **reject** you sit up and listen. So when TRC suggests ;
 - ✓ Developers failure proper plan and assess as to site access and constructability a fatal flaw
 - ✓ Failure to respect the cultural landscape and heritage values proposition
 - ✓ Failure to respect natural assets and associated biodiversity
 - ✓ Failure to respect social cohesion
- ” ...so we really think this site is not suitable. So maybe a good project but not on this site...”

Social License Visual Impact

- ReD4NE deals constantly with State Governments – it's cap and trade is to advise on and advocates on planning governance –new and old.
- It is patently aware that Agencies like DPE are trying to ensure that their regimes reflect modernity and the realities of the energy transition –Social License is of critical importance we see that in Humelink VNI –West ,CWO REZ and Offshore Wind.
- Planning guidelines as planning principles remain work in progress - LVIA assessment has been a critical centre of these guidelines since 2002 – with Draft Guidelines in 2011, Renewable Energy Action Plan in 2013 , Wind Energy Guidelines in 2016 including a Visual Impact Assessment Bulletin and most recently Draft Energy Guidelines in 2023
- So the world of Visual Impact Assessment has become a lot more scientific than 2006 when the then CJ of the L&E Court had to grapple with the conflicts presented in Taragla Landscape Guardians Inc v Minister for Planning and RES Southern Cross Pty Ltd
- Taragla wouldn't be approved under newer iterations of Visual Impact Guidelines. To suggest its an applicable precedent for reversing DPE's recommendations is an absurd undermining of existing and draft Visual Impact Guidelines.

Voluntary Land Acquisition

- The IPC very appreciate securing social license is a precious asset in the energy transition.
- To suggest that one of the tools to securing enhanced developer profitability is to grant **voluntary land acquisition** –such a move would quickly ensure the gate closes on the transition. Public Benefit V Individual Dis - benefit
- The DPE at page 33 suggests such a move is not warranted given 22,000 MW nameplate capacity in the NSW Wind Pipeline – in terms of the project insight it would appear the most exposed landowner know DAD - 01 –is not interested in an agreement .



Thankyou