



Dear Sir/Madam,

Burrendong SOS - Objection Submission - SSD-9679 (Hills of Gold)

Burrendong SOS objects to the project and the changed recommendations by the NSW Department of Planning, Housing, and Infrastructure to the IPC. Our objections are as follows:

1. No where in the *NSW Wind Energy Guidelines 2006* (the Guidelines) does it require assessment / consideration of economic viability of a project. How and why is this trumping all other Guideline requirements?
 - Wind corporations should not be able to maximise the number of turbines proposed for their projects, giving limited to no consideration of adverse impacts on surrounding landowners, community and the environment and then cry poor that their project will not be economically viable if their poorly sited turbines cannot meet requirement of the guidelines and are not approved for construction. If IPC approves inappropriately sited turbines for SSD-9679 based on the project's economic viability, this will set a devastating precedence for future projects.
 - If a project is economically unviable it should not be constructed full stop. This is standard practice for other development types. Corporations must do their economic viability analysis at the outset of the project, this includes ruling out the siting of turbines in locations that are unlikely to meet guideline requirements upfront. Economic viability of a private corporation is not a planning consideration for the NSW Department of Planning or IPC.
 - If IPC accepts that economic viability trumps the requirements of the Guidelines, then assessing impacts against the Guidelines will in fact become a pointless endeavour. The land use rights and considerations of rural landowners and communities will be steamrolled. The Guidelines will give false meaningly hope of ensuring reasonable visual, noise and environmental impact outcomes. The whole assessment process could just be scrapped and instead based on an economic viability analysis for private corporations!
 - The State Government is constantly changing the goal posts in favour of 100% profit driven, predominantly foreign-owned multinational renewable energy corporations. This is not a fair nor democratic process.
2. If economic viability for the wind corporation proponent is to be taken into account, then it is only fair that a similar study must be undertaken to assess the economic viability of surrounding landowners land, where land value will be significantly reduced due to visual, acoustic and environmental impacts of turbines.

- There have been no recent land value impact studies in this regard, noting turbines have practically tripled in height and megawatt power since the last land value impact studies were undertaken, yet there has been no increase in the minimum setback of houses to turbines requirements during this time.
3. A condition of consent requiring “Voluntary” acquisition of a neighbouring property within a set timeframe by the private wind corporation proponent, or else the neighbour has to ‘suck it up’ and put up with adverse impacts forever into the future, with no compensation and no requirement for siting and design of turbines to reduce adverse impacts. This will set a horrifying precedent. This will result in uprooting local multigenerational landowners and farmers who have strong emotional connection to their land and communities.
 4. Utilising the Draft NSW Wind Energy Guidelines 2023 (DWEG) for the SSD-969 is a breach of the DWEG, Section 1.4 Application of the Guideline. Section 1.4 outlines when these guidelines will come into affect, and they are clearly not a consideration or SSD-9679.
 5. The NSW Department of Planning Housing and Environment should not be compromising their assessment against the Guidelines because developers refuse to meet requirements of the Guidelines.
 6. The recently established Independent Expert Advisory Panel for Energy Transition by the NSW Department of Planning, Housing and Infrastructure, to provide “expert advice” for decision makers on the anticipated impacts and management options associated with proposed energy transition developments relative to Renewable Energy Zones. Given a merit component has now been introduced due to this expert panel. Burrendong SOS; CWO REZist and the National Rational Energy Network should now also have the same right to call on our own independent experts in regards to assessment of economic viability. It would be totally undemocratic otherwise. We request time for our own experts to assess economic viability of the project.

Sincerely yours,

Amber Pedersen

Burrendong SOS Representative.