

Cameron Greig

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Walcha NSW 2354

14/7/2024

To: Commissioner Sykes and Commissioners,

I object to the Hills of Gold Wind Farm SSD 9679

This is a personal submission, made out of serious concern for communities that live with the hosting of renewable projects.

This submission is made after reading the new information that was presented following the change of recommendation of the NSW DPIE, by reinstating 15 of the 17 turbines previously recommended for removal.

In my response, I have read a number of documents, but focused on the following;

- Attachment C Engie Response to RFI 27 March 2024 redacted
- Response to request for further information from the Department redacted

My concerns are summarised into the following areas;

1. The apparent change of direction from rules-based assessment to politically pressured outcomes.
2. Questionable Economic Viability
3. The introduction of voluntary acquisition as a solution for mitigation
4. Conclusion

1. The apparent change of direction from rules-based assessment to politically pressured outcomes.

Communities have had serious concerns about developer domination at the expense of their community structure, their local ecology and public amenity. We have been repeatedly told that we can rely on the DPIE as being separate from political pressure, and completely independent. The DPIE has a set of rules that a project must be measured against, in the process of assessment. This is all that has prevented communities from being completely overwhelmed and totally outraged.

It is of grave concern that this rigid adherence to a rules-based system, that once protected communities, is being thrown under the bus. What is described as “public benefit” is simply the adoption of an approval process designed for political expediency.

This is a dramatic change, a new and appalling precedent, and one that seriously erodes the credibility and integrity of the Planning System.

By its use, any flawed design may be assessed favourably, simply because it generates renewable energy. There is no justification for a Planning System to use such a “last resort” option.

2. Questionable Economic Viability

The Attachment D IEAPET Advice describes various options and the methodology of economic assessment. Without detailing the findings, they have explored 4 scenarios, and identified marginal positive returns with one scenario only, the remainder of scenarios producing negative returns. Besides stating that this is a scenario that conflicts with the NSW DPIE earlier advice of removing a number of turbines, its marginal nature gives rise to whether or not a developer will indeed build them in the first place.

Complexities with regard to access in steep terrain and on fragile soils have not been accurately measured, as there is no design detail given, as far as I can find, with regard to the design of these access roads and laydown areas etc. As a civil engineer, I am well aware of the increased cost of project capital expenditure, when considering the complexities of terrain, stabilisation of soils during construction, high rainfall etc. I am not at all confident that these additional costs have been adequately accounted for. How could they be, if the detailed designs have not been presented, and generic inputs used in the economic assessment?

REZ areas are oversubscribed with interest from developers. Multiple applications for generation projects outside of REZ zones add to the reality that there are numerous options for assessment and approval. Poor projects are not required to be patched together and approved on the basis of despair. If there were no other option, then efforts to remediate a poor design would be warranted. This is arguably not the case, as there are considerably better and far more options available for assessment.

Having projects that are poorly designed, clogging up the planning system, then sitting on a developers desk as a ghost project because of questionable economics, are NOT in the public interest.

Sending the message that projects have to be well designed, well located, and economically sound, IS in the public interest.

The recommendation from NSW DPIE and the outcome of this assessment process, will not only send a message, it sets the bar, and it sets precedent.

3. The introduction of voluntary acquisition as a solution for mitigation

Along with the previously mentioned loss of integrity that has occurred with a change from rules-based assessment to one of political expediency, the concept of voluntary acquisition has been suggested as a mitigation measure.

Rather than an option of last resort, the crafting of language around this solution has allowed a new expectation to be built. That is, a developer no longer has to follow rules, but can offer “market price” to a neighbour who has previously loved their home as a forever option. The message to NSW communities that neighbour a wind farm, take the “market price” or put up with the development on your doorstep (that has not followed normal development guidelines) without complaint. Please consider your own home or community being subjected to this.

I can't think of a time that this has happened before, for a private developer, outside of China?

More importantly for the transition to renewables, communities will now be awake to the precedent, and this raises the stakes. If a developer approaches a landholder, everybody knows now that all neighbours are going to be put under the bus by the Planning Department. This has dire consequences for all parties. Perhaps the neighbours' rights are now less of a concern for

the NSW Planning Department than they were before, but a host landholder now has to acknowledge their new responsibility.

I have no doubt that potential host landholders will now be far less approachable as a result, knowing that their neighbours will have little in the way of rights, IF this precedent is set.

This will undoubtedly make future arrangements between developer and host landholder more complicated.

We all have to acknowledge that this is NOT in the public benefit.

4. Conclusion

I would argue that a poorly designed project, in steep inaccessible country, that is clearly of marginal economic viability, is not worth a suitcase of band-aids to get it over the line, for the sake of public benefit, if the outcome is to harm the viability of many more future projects.

More so, if the public benefit, for this project, is questionable.

Developers must be given a signal that projects have to be well designed, to stand up on their merits and be economically viable, to achieve planning support.

This is not one of those projects.

Thank you for the opportunity to make a submission.

Cameron Greig