

**From:** [REDACTED]  
**To:** [Do-Not-Reply IPCN Submissions Mailbox](#)  
**Subject:** Objection to proposed Hills of Gold Wind Farm - SSD 9679 (resubmission due to no response received from IPC)  
**Date:** Monday, 15 July 2024 9:05:47 AM

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### Objection to proposed Hills of Gold Wind Farm - SSD 9679

My previous response endorsed the Department's rejection of a number of the proposed turbines. The Department has now reversed its decision but has not explained why the relevant planning requirements no longer apply.

Engie's recent responses have not provided any additional information or clarification to change the position I stated in my previous submissions.

Engie has demonstrated an extreme lack of respect for the planning system in NSW over the last five or so years. It has consistently presented third-rate submissions (a generous assessment), either wilfully ignoring instructions that are clear to most professionals preparing environmental assessments, or demonstrating a lack of knowledge in the various fields that they described.

Table 4 of the Department's response to IPC details the delays in the assessment process due to slow responses from Engie.

By gaming the planning system Engie contributes to the anti-planning (cut-the-green-tape) lobby's case to simplify or dumb-down the system. Their poor work is the reason an approval or non-approval has taken so long. It is not due to the system.

Engie has consistently wasted many people's time, forcing them to read and re-read thousands of pages of poorly written and incomplete documents in a limited time while they had the luxury of working to their own timeframe.

If they cannot prepare a quality environmental assessment, what credibility do they have to manage a complex engineering project?

### Property rights

In regards to the property rights of DAD01, Engie has made a decision at some point in its project development not to engage with the landowner and come to a satisfactory resolution.

It was disingenuous of Engie to propose constructing turbines impinging on DAD01 that they knew were in contravention to the planning guidelines and therefore not legally permissible. These turbines should be rejected outright.

The statement by the Department that recommending acquisition of DAD01 does not set a precedent is ludicrous. If it is done, it sets a precedent. It also rewards poor behaviour by the developer for not resolving this issue earlier in the process. It is Engie's issue to resolve, not the Department's. This is also rightly identified by the Department.

I do not know the owners of DAD01 or their circumstances, however the proposed acquisition conditions do not fit well with the current property market.

If the IPC does decide to approve this project, the conditions should be amended to take the following into consideration.

D1 – timeframe should be from commencement of operations, not from commencement of construction. Impacts will not be known until the proposed project is operational and it is highly likely that construction will not be completed in the proposed two or three years.

D1 (b) (i) restricts locations for the owner of DAD01 to move only within Tamworth or Upper Hunter LGAs. This is unreasonable. If someone's life is being turned upside down through no fault of their own, they should have flexibility to make a reasonable life somewhere else. Environments similar to Hanging Rock are rare – around Barrington Tops, some places in the Northern Tablelands. They are not all within reasonable

driving distance of a major centre such as Tamworth.

D1 (c ) Reasonable compensation should include all planning costs to get another building approval, assistance with applying for jobs in another area. Reasonable compensation should also include the difference in property value of acquiring a property elsewhere in a comparable environment.

Price rises during the process outlined should also be compensated for, for example by using regional price rise information which in the space of a protracted negotiation could be considerable if the pattern of the last few years continues.

### Decommissioning

Attachment 1 (economic analysis) to Engie's response has been redacted so it is impossible to determine whether decommissioning costs were considered. The Independent Expert Advisory Panel for Energy Transition (IEAPET) did not mention decommissioning costs either so I can only conclude that they were not included. This is very concerning, as raised in my previous submission.

If the IPC does not require a "sinking fund" style of bond, I can only hope that the landowners where the turbines are constructed require something in their annual payments as they will ultimately be responsible for having a decaying monstrosity on their land visible from a considerable distance and devaluing property in the surrounding area.

### Soil and water management

Approving 62 rather than 49 turbines increases the risk of soil erosion and water contamination substantially.

If the Independent Planning Commission follows the Department's advice to approve this proposed project, it is imperative that soil and water management practices (erosion and sediment control) are implemented PRIOR to any construction works commencing, not in response to observed issues as proposed by Engie.

I have a very good understanding of the nature of the soils in the proposed project area, as well as the unpredictable incidence, volume and intensity of rainfall. Engie's approach as outlined in previous documents seems to be "we'll deal with a problem if it happens". This is unacceptable and the community will pay the price of such a negligent approach. In the two or three years of proposed development, extreme rainfall events will undoubtedly occur.

### Conclusion

The Department's response to the IPC summarised its concerns about the quality of Engie's environmental assessment, including protracted delays and repeated requests for appropriate input. One would have to question Engie's commitment to this project. If they put as much effort into the construction, a two-three year project is likely to turn into a five-ten year project that will be obsolete before it is commissioned and financially unviable. The community will pay the price for this.

I strongly recommend that the Independent Planning Commission reject this proposal as it does not meet legislated planning requirements and is highly likely to have long-term detrimental effects on the local environment.