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To: [Do-Not-Reply IPCN Submissions Mailbox](#)
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Subject: CJ & MC Eagles Partnership Business Submission to Hills of Gold WF IPC - dated 15th July 2024
Date: Monday, 15 July 2024 8:06:21 AM

CJ & MC Eagles Partnership Business Submission dated 15th July 2024

We refer to our previous submission to the IPC dated 7th of February 2024 in response to the DPHI Assessment dated December 2023 and now this submission in response to the DHPI response to the IPC, dated 24th June 2024.

We continue to **Object** to the Hills of Gold WindFarm Development Assessment by the DPHI. Indeed the most recent response dated 24th June 2024, from the DHPI rather than addressing concerns previously raised about this proposal, has actually increased those issues and concerns.

CJ and MC Eagles Partnership operate three properties in the Upper Hunter, across a single Primary production enterprise, all properties are within close proximity to the Hill of Gold proposal. This proposal will have serious impacts to our business operations. Despite this planning process running for years and years, we still have no confidence that the proponents actually understand this environment, and as a result they have done nothing concrete to demonstrate that they can mitigate the risks to us and our business from a development in one of the most challenging environments in Australia.

The community is also strongly opposed to this inappropriate development.

Our previous issues raised on the 7th of February 2024, remain unaddressed and still stand. Additional issues that now arise from the updated DPHI response dated 24th June 2024:

Issues that arise as a result of the DPHI response dated 24th June 2024

- The DPHI has stated in an online meeting, which I attended, and in its own Assessment Report, that Hills of Gold Wind Farm will be assessed using the 2016 WE Guidelines. Yet, it has used the 2023 Draft Guidelines where it chooses, and supposedly as an “exercise”, which is then used to reinstate turbines.
 - Non-Compliant Turbines 9 -11 were removed under the applicable 2016 Visual Guidelines. The removal of these Turbines benefited our multiple properties in Crawney and Timor. To see them reinstated through a mishmash of applicable 2016 guidelines and the unratified and non-applicable Draft 2023 WE guidelines. The non-applicable draft 2023 Guidelines are not yet ratified may still be further altered, is not just disappointing but appears to be an very serious breach of the planning process.
 - So we have the completely ludicrous situation that non-compliant Turbines, per the actually applicable 2016 Guidelines, are being justified and recommended for reinstatement using the unratified, inapplicable draft 2023 WE guidelines.
 - Reinstating Turbines 9 - 11 will magnify the erosion impacts to the narrow Ridgeline of the fragile Great Dividing Range.
 - The partnership ask that these Turbines be removed, per the December 2023 Assessment, to prevent damage to the Isis Valley River systems
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- If DPHI insist on using the 2023 Draft WE Guidelines, then ALL aspects of the entire project should be reassessed against those draft guidelines, including reassessment and new assessments of all of our property Homesteads and Dwellings, which were unassisted under what we thought was the applicable regime. The updated Assessment should then be opened to public exhibition once more. To use the guidelines only when it suits lacks integrity and could be perceived as bias.

Additionally

Voluntary Land Acquisition is being imposed on a non-associated neighbour creating a dangerous precedent. The landholder CDC entitlement proceeded the issue of the DA by Engie. Engie should have accounted for it.

- The proponent still does not have legal access to the site
- A development that hinges on the inclusion of one Turbine to remain viable, for example #28, is unviable. How unviable will this Proposal become once the detailed designs and costs start to be properly assessed? This will be a disaster.

Impacts to the water systems of the Isis Valley remain the chief concern for our business:

- Recommending approval of 62 turbines results in increased clearing of vegetation on the range and reduces the infiltration of rainwater into the soil for release via springs into creeks and rivers. Concerns remain that the Applicant and DPHI do not understand and have not assessed nor considered the importance of the range as a water holding sponge.
- Soil scientist, Greg Chapman, who presented to the IPC, has warned that there has not been adequate detailed design to understand the extent of mitigation to avoid erosion, sedimentation and mass movement that could result in higher environmental and financial costs.
- The disturbance of phosphorous carrying soils without appropriate erosion mitigation, has the potential to cause Toxic Algal Blooms in the Isis River system.

We believe that the DPHI Assessment is deeply flawed, providing strong grounds for appeal, and has only resulted from pressure from an aggressive proponent that seeks to force decisions through threats and intimidation, but which actually seek to cover for the litany of failures that they themselves have brought upon themselves in their inability to do the necessary due diligence to comprehend the sheer complexity of the necessary design required to develop a singular plan for this proposal.

CJ and MC Eagles partnership are members of HOGPI and fully endorse the **Hills of Gold Preservation Inc** submission for this round.

In summary

It is noted that Engie still has no legal access to the development site 3.5 years since the release of the EIS and after many more years of failing to gain agreements and conduct consultations, there is no way to even get to the project area.

Engie's Hills of Gold Wind Farm has been unviable since it released its EIS on many more grounds than simply its financial viability. We urge the IPC to take seriously the community objections expressed in all our submissions, and in particular the case put forward by the Hills of Gold Preservation Inc submission to reject this development.

Building WindFarm infrastructure in non-REZ areas, with none of the associated supporting infrastructure, just magnifies the impacts on local communities and individuals. In addition to the WindFarm development itself, communities are also impacted by bespoke, and often inadequate supporting infrastructure developments such as roads, powerlines etc; Non-REZ areas should be excluded from this type of development.

The response to IPC by DPHI dated 24th June 2024, has actually increased the Partnership's grounds for the objections, rather than addressing any of the previously raised issues.

This is an:

Unsuitable Development, in an under serviced area, posing unacceptable risks, and should be Rejected. Nothing in the latest DPHI response to IPC dated 24th June 2024 has addressed these risks, instead it has simply magnified them.

We ask that the IPC **Reject the Hills of Gold WindFarm** proposal.

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