

Dear Commissioners

I made a previous submission for the Hills of Gold Wind Farm outlining my objections in February 2024. Thank you for reading my submission.

My concerns have still not been addressed and I would like to comment on the DPHI's response to the commission made on June 24, 2024. The notes in **bold** are direct references from the DPHI's response.

*Concern - Road plans – entry point, studies into disruption to traffic for Hanging Rock and Nundle*

**'the amended transport route influenced construction costs that underpinned the economic analysis for the project as all over dimensional vehicles have to travel into the site from the west along the length of the project to get to the northern arm. This change requires additional earthworks to facilitate the construction of the project overall. The Department commissioned a specialist engineering review, which raised concerns about the constructability of the project. After several meetings on this issue, the Applicant provided additional information in November 2023, four months after it was requested.'**

The Department has acknowledged issues with construction and access to the site but have not considered, or ignored, how these issues may affect the environment and/or community. Vehicle entry via the Western end of the project means that major construction works would need to take place at the Head of Peel catchment which supplies water to Nundle and all communities towards Tamworth (via the Chaffey Dam). There are still no details on how the project will mitigate land slips, erosion and degradation of water quality. This issue is significant, as the Peel River is part of the Namoi River Catchment, and the Murray Darling Basin.

The impact to local traffic will be severe, both in the road building phase and the wind farm development phase. The roads will need significant works to make them capable of accommodating the heavy vehicles that will need to traverse the region. Both locals and tourists are limited in their accessibility to Nundle and Hanging Rock. As a tourist dependent region we host a significant additional population during holiday periods and festivals, as well as weekend visitors who often come for short visits. If the tourist traffic is adversely affected, then the local businesses will suffer, too. A depletion of tourist purchasing power will be a diminution for the local economy and the wider public interest.

Further, the uncertainty that has surrounded the town of Nundle since the project was announced has had a deleterious effect on potential investment. I moved here in March 2022 for work. Since then, my fortunes have improved considerably, and I am in a position to invest up to \$1.5 million into a tourist-oriented business somewhere, preferably in Nundle. With the decision on the project still not finalised, and if the decision is for the project to proceed, I will not stay here or look to invest in a business here. The years of roadworks will be too destructive for a township that has no other reason to draw a crowd. The HOGWP should be rejected on this basis.

*Concern - Visual and noise impacts ignored*

**'However, in this assessment the Department has adopted the approach prescribed in the Draft Guideline 2023 as an exercise in quantifying the visual**

## **magnitude when considering the visual performance objectives of the existing 2016 Visual Assessment Bulletin'**

There appears to be much cherry-picking of policies to justify what is classified as high visual impact. With all respect, the bulletins are completely flawed in how these impacts are designed and measured – splattering a Van Gogh or a landscape by Albert Namatjira would not be a travesty? Or in the eyes of the visual impact policy makers perhaps not? As discussed in my presentation at the Nundle Hall I would be happy to host the 'policy makers' to my home, where my views of the landscape are as expansive and impressive as any landscape in the world – I am yet to receive any requests. The HOGWF should be rejected on this basis.

### *Concern - Dwelling entitlements and approvals not respected - Consequences of voluntary land acquisition*

The Applicant is now placing the burden on the decision maker to resolve this matter against the wishes of the previous landowner by requesting a condition enabling the Applicant acquisition rights. The Department notes there is no other energy project currently in the system where an applicant is forcing the burden of resolving such matters onto the decision maker.

Given the high generation yield potential at this location, the Department considers that further effort by the Applicant to resolve the issue should have occurred much earlier in the process. By not resolving this issue, the Applicant has contributed to heightened tensions in the local community and unresolved uncertainties for affected stakeholders.

The Department has not come to the recommendation for the acquisition of private land lightly and this approach should certainly not be seen as a precedent for other projects.

In the department's recommendation of private land acquisition, I am terribly concerned that a Pandora's box has been opened where multi-national companies have more rights than private landholders over land ownership. The HOGWF should be rejected on this basis.

### *Concern - Impact on Ben Halls Gap Nature reserve – impacts on flora and fauna to the immediate locality*

**The Department notes that although construction of this turbine would require clearing of an endangered ecological community, all clearing would be offset through the biodiversity offset scheme and the recommended conditions of consent require the Applicant to minimise the clearing of native vegetation and key fauna habitat, including hollow bearing trees, within the development footprint and protect native vegetation and key fauna habitat outside the approved disturbance area in accordance with limits in the recommended conditions.**

The Audit Office of NSW 2022, *Effectiveness of Biodiversity Offsets Scheme*, has identified that the demand for an offset has no bearing on the developer's delivery of appropriate environmental offsets. The Department should not be allowed to oversee continued degradation of the environment, the HOGWF should be rejected on this basis.

### *Concern – lack of community engagement - Illegally cleared land by the primary landholder*

**'The Department continued to receive complaints through the EIS preparation up to referral about the Applicants approach to engagement (such as missing Timor and Crawney). This was also further hampered by claims of unlawful clearing of land that were consequently found to have weight.'**

I have grave concerns that the Department is rewarding the developer for its poor consultative processes and the chief landholder for 'preparing the landsite' prior to approval and without permission. Neither have been held accountable for their actions. Approving the HOGWF would set a dangerous precedence for industrial development in the face of and, in spite of, environmental laws and protections. The HOGWF development should be rejected on this basis.

*Concern – Delays - Public benefit over community benefit – who is the public?*

**2.1 Assessment Weighting - 5. The public benefit in renewable energy generation outweighs the private disbenefits to individual landowners**

**This project received 382 objections on the original EIS and 280 on the amended application which was the second most received on a wind farm application (second to Jupiter Wind Farm in 2017 with 402 objections).**

**The Department acknowledges that the assessment process for this project has been protracted but considers that this is primarily due to delays from the Applicant in responding to matters that were material to the merits of the proposal. The Department considers if the Applicant had resolved the significant merit issues for the project in a more timely manner, the Department would have been in a position to refer the project significantly earlier with less uncertainty caused in the community.**

The department had already recommended that 17 turbines be removed from the project in December 2023 for a variety of reasons – the financial viability of the project for the developer and primary landholder should not trump the impacts on the environment and the wider regional community.

The NSW's REZ are justifiable as acceptable sites for the public interest – Hills of Gold sits outside of these and should be under much higher scrutiny – for public and community interest, as well as government trust and transparency.

The only ones to gain from the HOGWD will be the developer and the chief landholder.

The huge number of community objections via submissions is significant they represent 70% of the wider Nundle/Hanging Rock community – their views are being ignored – they are the public – we are the public.

Tamworth Council rejects the proposal on several grounds including lack of benefit to 70,000 people in its area – these are the public. The council represents the public.

The public interest is very clear – the HOGWF should be rejected.

Daniel Sassi

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