

**From:** [Dennis Armstrong](#)  
**To:** [Do-Not-Reply IPCN Submissions Mailbox](#)  
**Subject:** SSD-9679: Additional submission by SOS  
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**Attachments:** [Outlook-efauvilo.png](#)  
[SOS extra subm HoG WW 240701.pdf](#)

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Good evening

Please find the Save Our Surroundings additional submission to the IPCN for the proposed Hills of Gold Wind Works project (SSD-9679).

Regards

Dennis Armstrong

For Save Our Surroundings (SOS)



Save Our Surroundings (SOS) is part of network of like-minded groups of concerned & impacted citizens in rural Australia directly affected by the proliferation of industrial scale weather-dependent “unreliables” & their negative impacts upon local & global environments & communities. Independently run groups like SOS span multiple States. We share & distribute information, research & experiences with each other & other parties.

## SOS Response to IPCN reopening of submissions on Hills of Gold Wind Works

Save Our Surroundings (SOS) does not claim to have a capacity to understand the disputed legal opinions of two legal firms as raised in the case of the Hills of Gold assessment by the Department.

We do note however that from our highlighted sentence in the Herbert Smith Freehills letter of 16 February 2024, page 3

"...the deferral of any dispute relating to recommended conditions B32 and B33 to the Planning Secretary is not 'beyond the powers' of the IPC as contended in the Maddocks' Legal Opinion. This requirement is routinely incorporated into SSD development consents. **If Maddocks' position were to be accepted, almost all developments consents for SSD in NSW would be susceptible to challenge for invalidity.**"

SOS has been concerned for many years that the Department applies standard conditions that defer many actions by the Proponent until after approval and even then they can be changed with the approval of the Secretary. Also, several conditions will not mitigate the increased risk or ignore the issues the project will create. Reliance on poorly supported or unsupported responses from Proponents or "experts" paid for by Proponents is unsatisfactory.

Just one example relates to fire risk management. But there are many others, such as decommissioning and land rehabilitation, bat & bird kills, noise and infrasound, and land contamination. There are credible research and studies highlighting the growing problems that wind, solar and BESS projects are causing. SOS often references such studies, but which Proponents and the Department often choose to ignore.

On page 77 of the Department's Assessment the recommendations on Bush Fire Safety states:

- *Ensure compliance with relevant asset Planning for Bushfire Protection 2019 (or equivalent).*
- *Ensure the site is suitably equipped to respond to fires on site, including the provision of a 20,000 litre water supply.*
- *Prepare and implement a Bushfire Management Plan, and an Emergency Response Plan.*
- *Landscape planting to be in accordance with Planning for Bushfire Protection 2019.*

*"The Department, NPWS, RFS and FRNSW are satisfied that the bushfire risks can be suitably managed through the implementation of standard fire management plans and procedures. "*

A 20,000 litre water supply for a 87.3km<sup>2</sup> site is farcical. A single Electric Vehicle (EV) took tens of thousands of litres of water to control the spread of fire until the chemically driven battery fire burnt itself out. Water cannot extinguish a lithium battery fire and actually can cause the batteries to explode.

We also know that RFS, FRNSW and HAZMAZ teams will not directly try to extinguish wind turbine, solar works and BESS fires. They only will protect the perimeter, but can be exposed to very toxic smoke. Just too dangerous to fight, as stated in their incident reports to members. The Victorian CFA just last month banned fire fighting of wind, solar and BESS works because the dangers are too great to their lives. The same policies apply to Qld and NSW fire fighters. They will not directly fight such fires unless lives other's are at risk.

In 2006 a single small 2.5MW wind turbine in the South Australian Lake Bonney (Canunda Wind Works 278MW, 112 WTG) caught fire on 22/01/2006 and destroyed over 80,000 hectares (800km<sup>2</sup>)

## **SOS Response to IPCN reopening of submissions on Hills of Gold Wind Works SSD-9679**

of bushland. The totally destroyed wind turbine cost euro2.2 million but the cost of the damage was very much more. 63,000 homes were without electricity as the whole wind works was closed down and many WTG remained shut down.

Several additional wind turbine, solar works and BESS fires have already occurred in Australia recently. Only a matter of time before a major catastrophe occurs in rural regions when unfavourable weather conditions combine, as happened in February 2017 with the 550km2 NSW Leadville-Dunedoo fire that destroyed 35 homes, killed 5000 livestock and countless wildlife in 24 hours.

Yet the Department only requires a 20,000L water tank and compliance, after project approval, with inadequate RFS and FRNSW guidelines. How long and what resources were required in October 2023 to extinguish the three highest rated fires in NSW near Gulgong , which in the "pilot" CWO REZ? Days! Multiple water bombing aircraft and dozens of appliances. Lives where under threat, with 'too late to leave' warnings issued. With this known real world knowledge of the increased fire risks that wind, solar and BESS projects create we get the same or weakened consent conditions.

Who will take responsibility when the inevitable happens? The Proponent, the Department and the IPCN and our governments will not be able to claim they were not warned or aware of the multiple increased risks and environmental damage that wind, solar and BESS projects create.

Regards

Save Our Surroundings