

## **Hills of Gold IPCN Submission – Additional Material**

I uphold my original objection to Engie's proposed Hills of Gold Wind project. I would like to reiterate my original points of objection: impacts to local landowner and community history and heritage, bushfire risk and limitations to firefighting, impacts to roads and traffic and local road user safety, land use conflict, water use, impacts to visual amenity and noise levels. I would also like to support other members of the public in emphasising the following potential negative impacts: erosion and sediment, water source contamination, biodiversity impacts, impacts to livestock health and human mental health and the environment.

### **The Applicant**

The Department has stated numerous faults with regard to Engie's conduct in planning and developing the Hills of Gold Wind project:

"Only following the Department's recommendation to delete turbines 53 to 63 has the Applicant presented clear evidence that the entire wind farm would be unviable without those turbines."

"... proximity to adjacent land means the adjacent land should have been secured through an agreement with the landowner very early in the Applicant's design for the project"

"The Department notes that model wind farm applicants invest significant effort prior to the submission of the Scoping Report for a project until it has sufficient resolution of the key merit issues such as visual impacts through redesign or securing neighbour agreements."

"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."

Engie's website states "At ENGIE, we're dedicated to the renewable energy transition and understand that we need local support and engagement to achieve that. That's why our engagement strategy is to have a transparent and open line of communication with the community, share knowledge and help create positive outcomes.

ENGIE actively engages with host landholders and communities to identify local considerations that help shape the project, programs and initiatives that genuinely benefit the local community."

The Departments statements above suggest Engie should have been more transparent and sought to engage more collaboratively with the local community to garner support, or at least acceptance, from members of the public (especially those directly impacted by the project) and eliminate any possible community divide instead of exacerbating conflict as has been the case.

Engie's website also states that "ENGIE is a signatory of the Clean Energy Council's Best Practice Charter for Renewable Energy Projects; a set of commitments to engage respectfully with the communities in which we plan and operate projects, to be sensitive to environmental and cultural values and to make a positive contribution to the regions in which we operate."

The Clean Energy Council website states "we also have a strong focus on raising standards and maintaining integrity within the industry." Has Engie's conduct when dealing with members of the public been honest and shown a consistent and uncompromising adherence to strong moral and ethical principles and values?

Should a proponent who has not adhered to 'best practice' during project planning and development be permitted approval for construction where the potential negative impacts have been and will

continue to be devastating and irreparable for the local community, especially directly impacted landowners? Does that open the door for an “anything goes” policy for developers when rolling out renewable energy projects in the future?

### Viability

The Independent Expert Advisory Panel for Energy Transition (IEAPET) has advised that the only viable scenario for the Hills of Gold Wind project is the approval of 62 turbines. Why is viability an issue being investigated by IEAPET through the Department of Planning, Housing and Infrastructure? The Hills of Gold Wind project is a development being proposed by a private company therefore leaving feasibility of the project up to the developer, not the NSW Government. Any interference will further exacerbate the scales already being tipped in the favour of renewable energy developers against landowners and rural and regional communities.

Viability of the project should not be sufficient grounds for 15 wind turbines, previously assessed as having “unacceptable impacts on visual amenity, biodiversity and Ben Halls Gap Nature Reserve”, to be reinstated. This makes a complete mockery of the Department’s assessment process and makes the very bold statement that the “public interest” is more important than any other potential impact.

### Precedent

The DPHI states in its response to request for further information dated 24<sup>th</sup> June 2024 that “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.”

Regardless of the Departments intentions this recommendation WILL most certainly set a precedent for other renewable energy projects in NSW. This will give way for developers proposing projects with unmitigable impacts on neighbouring land and residences to request Voluntary Acquisition rights be applied therefore diminishing and disregarding the rights of landowners to reject the impacts of such projects.

It is my understanding that if Voluntary Acquisition is applied, and the affected landowner fails to lodge a request, the proponent has upheld their responsibility therefore making the project and its negative impacts on the aforementioned land or residence permissible. What is the point of the existing, and new draft guidelines if not to protect adjacent landowners and residences from extreme, and/or unmitigated impacts if they want to continue living, or build, on their land?

Applying Voluntary Acquisition to a project being developed by a private company is a very dangerous precedent; one that will have severe, devastating and irreparable ramifications to landowners, communities and the environment surrounding the Hills of Gold Wind project and many others affected by renewable energy projects in the state!

### Public Interest

The DPHI states in its response to request for further information dated 24<sup>th</sup> June 2024 that “nevertheless, based on the IEAPET’s advice that constructing 62 turbines is the only viable option for a wind farm to proceed at this location and given the lack of other mitigation provided by the Applicant, the Department recommends it would be in the public interest to approve turbines 53 to 62 to provide 384mW of renewable energy to the state of NSW, with strict conditions for the acquisition of Lot 47 DP753722 (the land which contains DAD01).”

What does the term “in the public interest” really mean? Are the 382 members of the public who have objected to the Hills of Gold Wind project considered adequately under the term “public interest”? Are the landowners and farmers who have already had and will have their lives, families, homes, businesses and environment adversely impacted by the project considered adequately under

the term “public interest”? Is it really acceptable to place the entire burden of energy generation on rural and regional areas, and have the people who provide the country with food and fibre make all of the sacrifices, to service metropolitan areas and deem it for the “greater good”?

The Department is essentially excusing the proponent for their “lack of other mitigation provided” and approving turbines with “strict conditions for the acquisition” due to the perceived “public interest” aspect of the project. Is that an acceptable mode of operation that will be utilised by developers in the future effectively rendering any adverse impacts of a proposed project inconsequential?

### Biodiversity

The Department's response to request for further information document states “the Applicant has accepted the deletion of T24 and is only seeking the reinstatement of T28, which would require clearing approximately 1.5ha of endangered ecological community which is in good condition.” “Should the Commission Panel agree with the advice from the Applicant and the IEAPET that the feasibility of project is dependent on the approval of 62 turbines, the Department considers the benefits of the project outweighs the relatively minor biodiversity impacts of reinstating T28.” Turbine 28 was previously rejected by the Department due to detrimental impacts to the biodiversity of the site – is it acceptable that the viability of a private company development prevails over the preservation of an endangered ecological community?

IEAPET's Advice document states that “some individual proposed turbines are on cleared land, but some others require vegetation clearing that generates significant biodiversity offset costs. There may be other sites with a higher percentage of cleared land that do not incur such costs. The Panel has noted above that the HOG biodiversity offset costs range from zero (for cleared land) to \$1.2m per turbine (average \$189k).” Is there a threshold where the impacts to biodiversity are too high to be alleviated by monetary contributions or claiming existing ecosystems as compensation for the destruction and devastation of others (the Biodiversity Offset Scheme)? I suggest there should be!

### Livestock health

I would like to draw the IPCn commissioners' attention to the potential impacts to livestock health and fertility. A landowner neighbouring an existing wind factory in NSW has had suspicions regarding poor fertility in cattle since the installation of turbines and has recently conducted an experiment in an attempt to quantify his theory. 30 cows were joined close to the neighbouring wind factory (approximately 1 to 1.5km), another 80 were joined further from the wind factory (approximately 3-4kms). These cattle were running in similar pastures and in similar body condition. Obviously, they could not all be joined to the same bulls at the same time so there is some variability however there were 7 dry cows, out of 30 (23%), in the mob close to the turbines and 5 dry cows, out of 80 (6%), in the mob further from the turbines. A seventeen percent decrease in fertility is an enormous loss of profitability for any business. Should these potential impacts to neighbouring businesses running cattle be investigated and quantified prior to the possible approval of the Hills of Gold Wind project? If the project is approved and there are impacts to cattle fertility, or any other livestock health issues arise as a result of the wind turbines, who will be liable for the loss of income and future viability of farming businesses – the proponent, the Department, IPCn?

### Homes powered

I have previously raised the issue of the proponents' advertisement of the number of homes expected to be powered by the Hills of Gold Wind project. Engie's website states that “once constructed the Hills of Gold Wind Farm will provide renewable energy to power 182,000 average Australian homes”. Wind turbines generate approximately 30% of the power of their nameplate capacity meaning a

420mW project will produce what it is capable of one day out of three. Does that suggest those 182,000 average Australian homes will have power for one hour out of every three hours? How was the 'homes powered' figure calculated? How will Engie guarantee the 182,000 homes supposedly being powered by the Hills of Gold Wind project will have sufficient energy 24 hours a day, 7 days a week? If this is an inaccurate claim by Engie does that challenge whether the project is in the "public interest"?

### Human cost

The human cost of wind installations is already evident in communities where wind turbines are operating and emerging rapidly within communities with proposed projects, like the Hills of Gold Wind factory. Division begins with the secretive nature of renewable energy projects – developers prospecting for land 'hosts' and often having landowners sign non-disclosure agreements preventing discussion regarding the potential project between neighbours and friends. This division has already caused fractures and irreparable conflicts within families and life-long and intergenerational friendships. It has also caused disunity in once cohesive rural communities; communities that can only thrive through local volunteers, with a shared love for their district, working hard to get the best outcomes for their region.

There are also the direct impacts to those who live close to turbines:

- lack of sleep (which according to the Australian Institute of Health and Welfare is "associated with an increased risk of several conditions including type 2 diabetes, cardiovascular disease, coronary heart disease and stroke." "Poor sleep can seriously affect a person's quality of life and increase the risk of developing chronic health conditions. It also has a substantial impact on the Australian economy.")
- vibrations leading to house walls cracking
- noise (has been compared to watching tv with a vacuum cleaner running alongside)

Have these impacts been adequately investigated to ensure no landowner or residence will be subject to such effects due to the Hills of Gold Wind project? Who will be liable if these issues become evident after the project is constructed?

### Community Engagement

The Australian Energy Infrastructure Commissioner, throughout the Community Engagement Review consultation, held over 75 meetings with representative stakeholders, landowners and community groups and received 250 online survey responses and over 500 written submissions. It found that 92% of respondents were dissatisfied with the extent to which project developers engaged the local community and 89% of respondents stated that the information they received from project developers was not relevant to the concerns that they raised.

The Community Impact Survey, conducted by Property Rights Australia and NREN, collected 775 responses between Saturday 12<sup>th</sup> April and Friday 10<sup>th</sup> May 2024. An overwhelming 93% of respondents believe that the government has not acted in good faith rolling out renewable energy projects – nearly all feel that government departments have failed to conduct open and transparent consultations, and an even larger portion say their concerns have been completely ignored. 76% of respondents reported feeling pressured by energy companies to allow access to their private properties and a tiny 3% believe that the developers have acted with integrity.

Given the above evidence, and the Departments comments regarding Engie's actions to date, would it not be prudent to make an example of any proponent not described as a "model wind farm applicant" and refuse approval of the project sending a clear message to future applicants regarding what is acceptable behaviour and process when developing a renewable energy project and what is not?

## Conclusion

The Department's assessment of the proponent, Engie, and its process and conduct to date is somewhat scathing. Engie, like all major international companies, is not proposing this project for the "public interest" or the "greater good" but instead for the economic surplus that is available to be secured. The windfalls obtainable for renewable energy developers at present are lucrative to say the least – from project flipping to the benefits of the Australian Government RET Scheme. Engie is not looking to assist Nundle and the surrounding towns and villages to thrive, it is instead looking to take advantage of the potential financial gains.

Nundle, and the surrounding district, will be left with some monetary contributions from the proponent but ultimately a divided population, an enormous and frightening bushfire risk (and little to no aerial assistance when a fire does ignite!), extensive and immeasurable detrimental impacts to the local environment and an unrecognizable landscape. Is altering and devastating the Nundle region as it is now known and loved, in the name of the "public interest", really for the "greater good"?

Commissioners, please consider the potentially disastrous consequences and the potential precedent of construction of the Hills of Gold Wind project and recommend rejection of the proposal.

Yours sincerely,  
Emma Bowman