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To: [Do-Not-Reply IPCN Submissions Mailbox](#)
Subject: Hills of Gold wind Farm (SSD-9679)
Date: Sunday, 14 July 2024 7:37:09 PM

Dear Sir

I OBJECT to this proposed wind farm.

The Hills of Gold Wind Farm proposal was referred to the Independent Planning Commission (IPC) back in December 2023. The DPHI recommended approval for 47 turbines, removing 17 turbines that weren't compliant with noise and visual guidelines, or to reduce environmental impacts.

Following this, the applicant, Engie, claimed that the project was not commercially viable with only 47 turbines.

The DPHI has now changed its recommendation to 62 turbines, reinstating 15 of the 17 non-compliant turbines.

How can this be? The project was assessed against the environmental guidelines and the recommended number for approval was 47 turbines. If a windfarm of 47 turbines is not commercially viable, the project should not proceed. The environmental guidelines should not be disregarded simply because the number of turbines the guidelines suggest are appropriate means that the project is not "commercially viable" for the applicant. Why have a process of environmental assessment at all if it is going to be ignored whenever an applicant claims it needs more turbines for the project to be "commercially viable"? Is the environmental process rigged in favour of the renewable energy industry?

Even though the Visuals were supposed to be assessed against the 2016 guidelines, the DPHI have cherry picked the 2023 Draft guidelines, to support the reinstatement of the Turbines.

It is not a public benefit to approve: a marginal to unviable wind farm; a State Significant Development on unlawfully cleared land; imposing compulsory land acquisition on a non-associated neighbour and setting a precedent for other State Significant Developments statewide; a wind farm between two national parks, Crawney Pass National Park and Ben Halls Gap Nature Reserve (including Critically Endangered Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest); a wind farm without detailed design of internal roads on steep gradient land, with high erosion, sedimentation, and mass movement risk requiring mitigation with potentially understated environmental impacts and financial liability.

The wind farm will be entirely constructed on class 7 & 8 soils. Class 7 & 8 soils are "water erosion and mass movement prone". Class 8 is the highest on the scale and means the soil is not sustainable for land use – humans keep away. These are soils that are so erodible that the vegetation on them should never be cleared.

The proponents of this windfarm prepared an environmental impact statement (EIS) that is supposed to outline how the project might affect the natural environment. The EIS calculated the "revised universal soil loss equation" for the project to be 471 tons of soil per hectare per year. The total development footprint is claimed to be 513 ha so the amount of soil erosion expected from the development will be, according to its proponents, 241,623 tons of soil each

year. Large trucks carry up to 14 tons of soil, so this amount of soil is equivalent of 17,250 large truckloads of soil each year.

Just imagine the damage to our Isis, Barnard and Peel rivers, our water supply, from the amounts of soil erosion that will occur if they build the proposed 62 wind turbines and associated roads and infrastructure at the headwaters of those rivers. It is pure environmental vandalism.

Vegetation on grade 7 and 8 soils should never be cleared.

These rivers will silt up and there will be no water for agriculture in the entire Hunter Valley.

Soil and water expert Greg Chapman gave evidence at the Hills of Gold Wind Farm Public meeting in February 2024 that a revised universal soil loss equation of 60 tons per hectare per year is considered extreme for construction sites and more than 2 tons per hectare per year can impact water quality. Chapman showed maps produced by the New South Wales government which showed that the whole project area is classified class 8 as "water erosion and mass movement prone".

Given this, how could any responsible person describe the impact of the proposed windfarm on the potential for soil erosion and mass movement as "inconsequential"?

The proponents did. How shameful of them.

The proposed Hills of Gold windfarm is in an unsuitable location and poses an unacceptable risk. Silted-up Isis, Peel and Barnard Rivers are the future if this windfarm project goes ahead which would be a much greater environmental tragedy than the likely damage expected from gradually increasing temperatures over the next 100 years.

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