

# Graeme Watts – IPC Submission - Hills of Gold Wind Farm (SSD-9679)

15<sup>th</sup> July 2024

I make this submission once more as the co-owner of [REDACTED] (NAD\_69) and 'Campo' [REDACTED].

I refer to my previous submission to the IPC dated 12th of February 2024 in response to the DPHI Assessment, dated December 2023, and now this latest submission in response to the DHPI response to the IPC, dated 24th June 2024, and Engie public submissions dated, 12th February 2024.

I continue to **Object** to the Hills of Gold Wind Farm Development Assessment by the DPHI. The most recent response from the DHPI, rather than addressing concerns previously raised about this proposal, has actually increased those issues and concerns.

**None of these previous issues have been addressed.**

The re-submission has raised the following additional concerns.

## **1. Inconsistent application of guidelines leading to onerous reinstatement of turbines**

- The DPHI has stated in an online meeting, 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, as non-compliant to benefit ourselves and other Crawney and Timor Landholders.
- Now these turbines are returned in 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 and may still be altered further .
- I ask that these Turbines be removed, per the December 2023 Assessment.

## **2. Requirement for visual assessment to be completed in line with new guidelines**

- For consistency, 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 the homesteads and dwellings, many of which have not been previously identified, and the environment within the Isis Valley.
- Our property (NAD 69) was assessed in line with the 2016 guidelines. To use the guidelines only when it suits lacks integrity and could be perceived as biased. I ask that NAD-69 be assessed using a 2023 Guideline compliant photomontage with grid overlay to identify cell count and visual impact for that property, and that this be made available to us.

## **3. Visual assessment to be completed for previously unevaluated non-associated dwelling**

- My partner and I are also the owners of ‘Campo’, 1670 Timor-Crawney Road (DP 855454) which has a small house located less than 5km away from the nearest proposed turbine [WTG -9]. 15 turbines (WTG 4-18 are less than 6.5km away from this property house. This property is noted as NAS-15 in the submission documents, but was never considered by the proponent as a dwelling. If this project is to be evaluated consistently in line with the 2023 Draft Guidelines, then a visual impact and noise assessment should be completed at this property as a non-associated dwelling as part of the evaluation.

I request that this be completed.

#### 4. Visual screening mitigations remain insufficient

- In my previous submission, I noted that the secondary mitigation of vegetative screening proposed for NAD-69 was insufficient, not desired and unfeasible. However, despite the reinstatement of a number of turbines assessed as medium visual impact for our property (under the 2016 guidelines) this has taken no account of this, continuing to assume that vegetative screening is possible. I request that this be reconsidered.

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. They 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?

#### In summary across both submissions

The significant risks and blockers to the construction and ongoing viability of this proposed Wind Farm have not been addressed by the DPHI response, in fact they have been magnified. The state has set important targets for renewables, but given the ongoing risks and issues associated with this project it must surely not be where the state’s efforts are best targeted for maximum public value. The efforts of DPHI and private capital would be better focused on viable projects with some level of social license that are aligned with a designated REZ area.

From an observer's perspective considering the approval or rejection of projects we do not understand how the State Government has allowed this project to continue, placing unnecessary stress and strain on a small community. The following chart captures a simple check-list that could have been used many years ago to guide project approval:

Selection Criteria	Successful Projects	Hills of Gold Project
Short Project Review Period	✓	✗
Social Licence	✓	✗
'Just' Transition	✓	✗

Low ecological impact	✓	✗
Located in Renewable Energy Zone	✓	✗
Low Implementation Cost	✓	✗
Defined & Low Risk Project Access	✓	✗
Effective Community Consultation	✓	✗
Unconditional Local Government Support	✓	✗
Majority Support by Local Community	✓	✗
Long Term Project Costs Understood	✓	✗
Complete Local Government Support	✓	✗
Geologically suitable to support project	✓	✗
Clear & Consistent Project Assessment Guidelines	✓	✗
Project development occurs post approval	✓	✗

It is clear that this project in its entirety is poorly conceived, poorly assessed and could have easily been prevented from causing such a harmful impact on an environmental, cultural and timeless NSW country community and location.

This project 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.**

I ask that the IPC **Reject the Hills of Gold Wind Farm** proposal.