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To: [Do-Not-Reply IPCN Submissions Mailbox](#)
Subject: Hills of Golf Wind Factory proposal, Nundle and Crawney
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I wish to object to the latest application of the Hills of Gold Wind Farm proposal at Crawney Ranges between Nundle and Timor, NSW for these several, very important reasons . . .

Biodiversity

- Protecting biodiversity is important for Australia and the world. Recommending approval of 62 turbines prioritises private profit for a multinational company instead of biodiversity of Australian native flora and fauna.
- Many submissions asked for removal of turbines next to Ben Halls Gap Nature Reserve, yet eight wind turbines and other infrastructure like a concrete batching plant, internal road, turbine foundations, hardstands, and cabling remain. Earthmoving and clearing is proposed within 135 metres of Critically Endangered Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest that only occurs in this location.
- In a 62-turbine marginal to unviable scenario nineteen (19) Moderate risk turbines remain, including reinstatement of five Moderate risk turbines (WTG 9, 28, 58, 59, and 61) that were previously removed in the 47-turbine recommendation.
- The Community requests removal of all turbines next to the Ben Halls Gap Nature Reserve, having no confidence in the Applicant's capacity for self-monitoring of bird and bat carcasses by sniffer dogs and ecologists to inform potential curtailment of turbines, or the risk of scavenging by foxes, cats, dogs, pigs, and raptors.

Water

- Recommending approval of 62 turbines results in increased clearing of vegetation on the range and reduces the infiltration of rainwater into the soil for release via springs into creeks and rivers. Concerns remain that the Applicant and DPHI do not understand the importance of the range as a water holding sponge.
- Soil scientist Greg Chapman has warned that there has not been adequate detailed design to understand the extent of mitigation to avoid erosion, sedimentation and mass movement that could result in higher environmental and financial costs.

Public Benefit

It is not a public benefit to approve:

- a marginal to unviable wind farm, even with the generous green subsidies forced on the electricity consumers are our state;
- a State Significant Development on unlawfully cleared land;
- Imposing Voluntary 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.

Unviability

- The Independent Expert Advisory Panel for Energy Transition (IEAPET) modeling suggests that a 62 turbine layout of the project is the only viable scenario. Using IEAPET's alternative modeling all potential turbine layouts would be unviable.
- The project is so marginal that turbines previously recommended for removal for compliance with 2016 noise and visual guidelines, and biodiversity conservation have been reinstated.
 - For example, Turbine 28, which requires clearing 1.5 ha of good condition endangered ecological community Ribbon Gum Mountain Gum Snow Gum,

threatened species habitat for the Koala, Barking Owl and Large eared Pied Bat has been reinstated to achieve the 62-turbine viable layout.

- The IEAPET advice states that the applicant would need to spend \$7 million on further detailed assessments to reach readiness for consideration of an investment commitment (pg 12).
- The IEAPET assumptions do not include factors that would contribute to the unviability of Hills of Gold Wind Farm:
 - Significant increases in build costs.
 - Site complexity - steep terrain, narrow ridgeline, erosion, sedimentation and mass movement risk.
 - Potential construction delays increasing costs.

Precedent

DPHI states that it does not want this case to be a precedent, but if Hills of Gold Wind Farm is approved by the IPC, it will be. The concern for NSW landowners is:

- that 2016 wind visual and noise guidelines are not being upheld;
- the DPHI alternates between the 2016 and 2023 draft guidelines to reinstate turbines, but doesn't remove turbines;
- dwelling entitlements and approved development applications are not respected;
- Voluntary Land Acquisition is being imposed on a non-associated neighbour and screening is the only mitigation for other non-associated neighbours, without their agreement or consideration of bushfire risk;
- Some biodiversity costs have been avoided because part of the wind farm infrastructure is proposed on previously unauthorised (illegally) cleared land.

I implore the Independent Planning Commission and the DPHI to reject this application for all the reasons above and the reasons previously given.

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