

From: [Ken Sylvester](#)
To: [Do-Not-Reply IPCN Submissions Mailbox](#)
Subject: Hills of Gold Wind Farm objection
Date: Monday, 15 July 2024 11:43:52 AM

I Ken Sylvester, owner of “Crawney Station” Crawney & “Isis Hills”, Timor, “Morley Downs” Green Creek would like to make ANOTHER submission of objection to the revised response by the DHPI to the IPC dated the 24th of June 2024 and Engie public submissions dated, 12th Feb 2024.

WE strongly object to the reinstatement of turbines 9-11 after the IPC deemed them non compliant. Turbines 9-11 are most impacted by our property Crawney Station as stated we have 60-degree view from all 3 houses on the property and should visual screening be used it will take so long to obscure the turbines, but also it would block much needed sunlight into the homes. The Valley is known for how cold it is and every bit of “natural heating” and light needs to be maximised it seems a major contradiction that we would block sunlight which helps heat and light homes so as to block the industrial view of a wind turbine.

I met both with and spoke at the IPC hearing in Feb 2024 and took a lot of time to explain the fragility of the area, and the impacts these turbines would have on the land. The Valley has the soft soils and many landslips, it is very fragile when disturbed which is why it has been so protected. The amount of earthworks that would need to be done and costings to stabilise soils (if that is possible) would not be worth it compared to the long-term damage to the water filtration of springs and water shedding into the Isis River of which Crawney is the head waters, would have. It is imperative the DHPI take this into consideration!

I also strongly object to and reject the DPHI’s agreement to grant Engie (a private commercial multi-national company) the right to a Voluntary Land Acquisition imposed on a private landowner’s land (property NAD 01) to suit Engie’s financial viability. I Strongly object to the dangerous precedent that DPHI is setting by imposing land acquisition on a private land holder by a private commercial multi-national company. This means legal dwelling entitlements and approved development applications are not respected or safe in NSW.

I urge the Independent Planning Commission (IPC) to reread my previous submission from February 2024 and state that all our objections still remain.

I also support the application made by the community of Timor, Crawney and

Green Creek Valley I include part of their submission in my objection.

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.
- The disturbance of phosphorous carrying soils without appropriate erosion mitigation, has the potential to cause Toxic Algal Blooms in the Peel, Isis and Hunter River systems and the downstream Glenbawn and Chaffey Dam water catchments.

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 unauthorised cleared land.

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.

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.

Public Benefit

It is not a public benefit to approve:

- a marginal to unviable wind farm;
- 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.

I am happy to address or meet with any members of the government to discuss my concerns further.

Thank you for the time taken to review this objection

Regards

Ken Sylvester