

**From:** [REDACTED]  
**To:** [Do-Not-Reply IPCN Submissions Mailbox](#)  
**Subject:** Hills of Gold Wind Farm  
**Date:** Sunday, 14 July 2024 5:40:06 PM

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Dear Ms Sykes,

### Opposition to Proposal

I write to strenuously disagree with the Department's latest, somewhat reluctant, recommendation that the proposal should proceed with 62 turbines, because the windfarm would not be viable without that number of turbines. That commerce should outweigh the value of the sensitive and endangered environment AGAIN, is the reason that Australia has a major problem with land clearing.

[1]

And, the Department has acknowledged that illegal land clearing

[2]

has already occurred in order to make this proposal as 'viable' as it is – why is this sort of behaviour being rewarded?

I note that the Department has recommended and specified biodiversity offsets. May I suggest that there is ample evidence in the public arena that such a process does not result in supporting endangered flora and fauna.

[3]

Whilst I am pleased to see that there are very specific requirements to redevelop specific flora, there is nothing that demands that this should be in this region, or that all the plants be combined to make a similar ecosystem to the ones that are removed. We, as a community, will be impoverished by the removal of these endangered plants and animals, and this will be exacerbated if the offsets are in an entirely different part of the countryside. As the Audit Office has already identified, the demand for an offset has no bearing on the developers' delivery of appropriate environmental offsets. The Department has overseen a program of slow degradation of the environment on its watch; I do not want to be party to further damage, as a result of this application being permitted to go ahead.

Further, it seems a little ridiculous that we should be considering the permanent degradation of the environment, in order to save the very same environment. I say this because the applicant is under no obligation to remove the many tonnes of concrete that will have to be poured to hold the turbines, even if the turbines themselves are removed. A bit of dirt over the top of the concrete will not rehabilitate the bush, and certainly will not provide habitat to sensitive plants and animals. So far as I know, Australia's marsupials cannot burrow through concrete. The landowner has already illegally cleared land to entice the applicant in the first place. Have they been asked to rehabilitate the land in any way? We, as a community have no idea of the answer to this question, because the process is too opaque. That does not create any confidence that the biodiversity offset process as defined by the Department will be implemented for our, the local community, benefit, or indeed for the broader public benefit.

The NSW Government recently approved a Regional Energy Zone (REZ) in central NSW. The Hills of Gold Wind Farm is well outside that area. What is the point of having a designated REZ if a developer can put a wind farm anywhere they want? Would it not make more sense for wind farms to be put in places where the land is already cleared? where the landscape is not so delicate? where there are no biodiversity issues? where the community has not been rent asunder by the lazy approach to consultation undertaken by the applicant?

Finally, The Department makes the point that it does not wish to set a precedent by recommending that land be purchased because there is no way to mitigate the impact of the proposed wind farm for the landowner. Unfortunately, history teaches us that government action always creates precedents. Once the genie is out of the bottle, it can never be forced back in. Do we really want a situation whereby developers can insist on landowners selling their land to them to create wind farms?

For the transition to renewable energy to be accepted by the community at large, it needs to be seen to be fair to those who need to host the new facilities. This proposal is not fair, and neither is it reasonable. The Department might think that its long list of requirements will hold the applicant to account, but the applicant and major landowner associated with this proposal have not acted in good faith thus far, and therefore they should not be presumed to act honourably in the future. Please, disallow this proposal.

Kind regards

Dr Kerry Nixon

[REDACTED]

Nundle 2340

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[1]

[https://www.nature.org.au/nsw\\_clearing\\_640\\_football\\_fields\\_of\\_land\\_per\\_day\\_the\\_majority\\_unexplained](https://www.nature.org.au/nsw_clearing_640_football_fields_of_land_per_day_the_majority_unexplained)

[2]

NSW Department of Planning, Housing and Infrastructure, *Response to questions regarding Hills of Gold Wind Farm* (SSD-9679), 24 June 2024, p. 10

[3]

Audit Office of New South Wales, 2022, *Effectiveness of Biodiversity Offsets Scheme*, <https://www.audit.nsw.gov.au/our-work/reports/effectiveness-of-the-biodiversity-offsets-scheme> ; Environment Protection Authority, *NSW State of the Environment 2021*, [https://www.soe.epa.nsw.gov.au/sites/default/files/2022-02/21p3448-nsw-state-of-the-environment-2021\\_0.pdf](https://www.soe.epa.nsw.gov.au/sites/default/files/2022-02/21p3448-nsw-state-of-the-environment-2021_0.pdf)