

Independent Planning Commission
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July 15th, 2024

Dear Commissioners,

Based on the Department of Planning, Housing and Infrastructure response to the Independent Planning Commission any renewables developer entering a community in NSW can stand in a town hall and confidently state, “We can do as we please because our project is a Public Benefit.” Developers could even stand side by side with their lawyers, and start community consultation how they intend to finish, quoting Case Law.

After more than six years it is exasperating to witness the DPHI flip-flop between 2016 and 2023 Draft Guidelines to justify reinstating turbines for project Hills of Gold Wind Farm viability, but ignoring the same guidelines that would require turbine removal and project unviability to protect Biodiversity and landowner/community amenity.

The greater weighting given to Public Benefit undermines both sets of Guidelines, ignores public and government consultation, local majority opposition, and the findings of state and federal reviews.

Fifteen (15) wind turbines have been reinstated giving greater weighting to Public Benefit over Individual (and community) Disbenefit, however the viability of even a 62-turbine Hills of Gold Wind Farm is in doubt considering all the variables, understatements and exclusions.

The project cannot lose a single wind turbine, the DPHI recommending clearing 1.5 ha of endangered ecological community Ribbon Gum Mountain Gum Snow Gum, good condition habitat for threatened species including Koala, Barking Owl and Large eared Pied Bat, prioritising reinstatement of moderate impact risk turbine 28.

Tamworth Regional Council has identified information gaps in the project, most importantly unclear and unresolved internal access via the Western Connector Rd and Transverse Track. Tamworth Regional Council’s concern about a proposed private road across a flood plain at the entrance to Nundle remains unaddressed. There is also missing information on two bridge replacements (Nundle Creek and Pearly Gates) and a new bridge over Wombramurra Creek.

Soil scientist Greg Chapman presented and wrote about his concerns that the environmental footprint necessary for soil erosion, sedimentation, and mass movement mitigation is understated, and consequently project costs are also understated.

Despite Engie's 2023 announcement appointing contractors to begin early planning and design of access routes across the site, and the Applicant's representative stating at the IPC Public Meeting that the transport contractor and engineer have contributed to '*suitability of the internal western access route up to the ridge line,*' the Transverse Track and Western Connector Rd preliminary designs have not been exhibited for community comment.

This is in stark contrast to the level of detail provided for the previously proposed and rejected Devil's Elbow Bypass, yet they are similar steep gradients in part. How can the community or the government assess viability, environmental impact or safety?

The Independent Expert Advisory Panel for Energy Transition (IEAPET) states that Scenario 62 is the only commercially viable option showing positive net present value. However, there are variables listed with the potential to negatively impact Hills of Gold Wind Farm viability.

Prior to financial close

- environmental monitoring;
- project design;
- development assessment;
- grid connection;
- landholder negotiation;
- actual costs of REZ development;
- investors averse to investing in a project that is significantly higher cost than competitors.

Construction

- transport access corridor restriction;
- recent and current upward movements in construction costs;
- <5 turbine suppliers in the Australian market;
- limited civil/electrical companies qualified and available to undertake work;
- cable manufacturers increasingly short in available manufacturing slots;
- final completion may take longer than 24 months in practice, extended delays increasing LCOE.

Post construction

- uncertainty regarding future carbon emission related prices or incentives post 2030 expiry of the Renewable Energy Target scheme;
- a Proponent with an LCOE of \$114 would require an energy sales strategy that would realise prices and revenue significantly above prevailing PPA rates, and/or revenues from ancillary sources to proceed with their project;
- complex terrain generating higher than normal capital requirements to manage roads and sediment runoff that would otherwise impact on adjoining sensitive and non-related landowners.

The distinctive point of difference of Hills of Gold Wind Farm is infrastructure partly proposed on unauthorised cleared land, the sub alpine microclimate with high rainfall and snow melt, soil prone to high erosion, sedimentation and mass movement risk, steep terrain, location between two national parks, and significance as a water storage (sponge) and supply for three catchments.

The IEAPET does not appear to be exposed to the concerns raised by Tamworth Regional Council, Greg Chapman, DPHI Constructibility Advice, or community members. There are already likely delays until a Muswellbrook Bypass is built, as the legal indigenous land claimant is determined, and Indigenous Land Use Agreement/s remain unsigned for use of Crown Land for access.

If IEAPET has not been exposed to documented information gaps, unclear and unresolved access issues, and understated environmental and financial costs, is the 62-turbine scenario viable, marginal or unviable?

It is unbelievable to be at this point after six years. Even the DPHI compares the relative swiftness that Uungula Wind Farm was approved. The wind industry loves to blame communities and the state government for delays in wind farm approvals, when the finger needs to be pointed at poor site selection and ignoring community consultation.

I respectfully request that the IPC takes into consideration the concerns of the people closest to Hills of Gold Wind Farm site - neighbours, community and Tamworth Regional Council - and recognises the environmental and financial risk exposure that remains unaddressed and threatens any Public Benefit.

Yours faithfully,

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