

**From:** [Michael Hill](#)  
**To:** [Do-Not-Reply IPCN Submissions Mailbox](#)  
**Subject:** Submission for Hills of Gold wind farm application (SSD-9679)  
**Date:** Monday, 15 July 2024 10:20:06 AM

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## **Submission for Hills of Gold wind farm application (SSD-9679)**

Independent Planning Commission (Commission) Submissions Re-opened on Additional Material

Dear Panel Chair and Commissioners,

I object to this project for the following reasons:

- Wind turbines are a significant fire risk, being a source of fire ignition and also the source of fire spread via blade throw in the event of a structural failure in the blade. Any other machine that suffered from the historical rates of fire as Australian wind turbines in recent times would be immediately withdrawn from the market.

- Cumulative effect of landscape impacts. Australia landscapes are having their natural character and beauty ruined.

- Environmental equity. The principle of environmental equity states that, to the degree reasonably possible, the burden of costs and harms should be carried by those demanding and consuming the end product. Rural Australia is being disproportionately harmed (environmental, social, community well being, mental health, anxiety) and has also been disenfranchised by a legal and regulatory environment that has, for the most part, cut local communities out of the decision making process. This is not consistent with environmental equity and is unjust.

- Secret contracts with non-disclosure agreements. Wind turbine development should not continue while corporations are using cynical and exploitive negotiating practices that divide communities with "winner and losers". It is unjust that some persons are benefiting at the expense of others.

-The use of so called "offsets" by the renewable energy industry has been used as a justification of much harm. A project should be judged solely on its own merits. It is not appropriate to conflate good works in one location (which should be praised) with harms done elsewhere. To do so is disingenuous and self serving and the Planning Commission should not allow the use of "offsets" to allow harms that would otherwise be deemed unacceptable.

I also understand that this project is being reassessed because the proponent has claimed the following:

"The Public Benefit in renewable energy generation outweighs the private disbenefits [the rights] of individual landowners"

This statement is disingenuous because a) it uses "legalise" to avoid using the appropriate term - "harms" and b) it seeks to avoid taking responsibility for the actual harms that this project will cause.

Moreover, statements of this kind are of no value and must be ignored by decision makers unless they are supported by rigorous documentation and calculations specific

to the project and made available for peer review and fully independently audited.

The fundamental justification of the project and the claim made above by the proponent must not only involve an accounting of the energy produced and utilised by the wind turbines during their life, but also all of the embodied energy and carbon footprint from all aspects of the project. This, at a minimum, should include (specific for this project) an accounting of the embodied energy /carbon footprint from all consultants & scoping works, mining and production of construction materials, fabrication, transport, site works and construction, transmission and other associated infrastructure, maintenance and operation, back up battery and/or gas plants and project decommission. This has not been published in the EIS and therefore no rigorous justification for the project has been presented, nor has any justification for the above claim been presented. On this basis the EIS is fundamentally flawed and this project must not be approved.

I emphasise this point. If project specific supporting calculations for the fundamental justification for a project have not been provided and submitted for transparent peer review and fully independently audited then no justification for the project has been presented and the project must therefore not be approved.

*Submission by: Michael Hill*

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