

Independent Planning Commission,

Re: Hills of Gold Windfarm, Nundle/Hanging Rock. SSD-9679

13 July 2024

I am writing again to voice my opposition to the HOG Windfarm.

Having read the latest submission and response from the DPHI, I feel that the proponents have made a dubious case that the project is economically viable, even with the reinstatement of turbines, taking the total back to 62. There are too many unknowns due to lack of engineering certainty in siting of turbines, access through private land, hostile councils, the necessity for road and bridge works, extremely steep gradients, Barry Road undercut by old mine sites, and the rising cost of materials, such as steel. The net result will be significant cost over-runs and time blow-outs.

Given this very marginal position, allowing the project to go ahead presents the risk of bulldozing environmentally sensitive land for the sake of a stranded asset. Without a bond being demanded of Engie, there is no guarantee they will clean up and rehabilitate a half-finished site, or compensate those landholders, councils and towns people who are impacted. That would be left to the courts, for those that can afford to complain.

That the DPHI has suggested involuntary acquisition of land is not only a controversial precedent, it is already being seen as a highly political one, likely to create a furious response, and attract considerable scrutiny. The fact that the project has been tainted by illegal land clearing, and characterized by extremely poor communication by the proponent with all parties over the last six years, should dispel any confidence the project will be built per the proponent's timelines or budget, be well managed, report as required on its activities, or be legally compliant regarding environmental obligations. Simply put, if management is this bad now, what will it be like later?

Introducing involuntary land acquisition is itself a can of worms type precedent that may lead to unintended consequences in other State Significant projects. To allow this for such a highly contested, dubious and marginally viable project such as HOGW would be a disaster, setting a very low bar.

I should think a failed project would further tarnish the reputation of wind, and by extension, alternative energy, creating more opposition to what is necessary to protect the world from extreme climate change. It may also undermine confidence in the planning and approval process. While the outcome of an approved HOGW is hypothetical, the likelihoods I have alluded to are high. Please don't approve this project.

Thank you for considering this submission.