

## **Ref No: SSD-9679 (Hills of Gold Wind Farm)**

Dear Commissioners Clare Sykes, Duncan Marshall and Juliet Grant,

Our submission refers to new information presented to the Independent Planning Commission (IPC) for the Hills of Gold Wind Farm (the '*project*').

We object to the changed recommendations of the Planning Department in their recommendations to the IPC. As such, we also object to the Applicant's current proposal.

### Model wind farm Applicant?

The Department of Planning, Housing & Infrastructure's ('*Planning Department*') response to the IPC dated 24 June 2024 'Response to questions regarding the Hills of Gold Wind Farm' ('*Department Response*') demonstrates that the Applicant has not behaved as a 'model wind farm applicant' (pg7). The Department Response suggests that:

1. the Applicant did not invest 'significant effort' prior to the submission to resolve key visual impact issues for impacted landowners; and
2. has been responsible for significant delays in the planning process.

By withdrawing the requirement to remove 15 turbines as originally recommended by the Planning Department, is evidence that developers can ride roughshod over Government, our community and our regulations and guidelines in order to turn a profit from renewable energy, the monies of which will go overseas.

If the Planning Department proposes that 'public interest' should override its own guidelines, to the detriment of individuals in the rural community, it should certainly not do so for an Applicant who has not shown itself to be a model developer. That is not in the public interest of NSW, no matter how much renewable energy is required in the future. We should be encouraging model behaviour by developers – this is the minimum expected from our community. Approving the project as now recommended by the Planning Department will set a dangerous precedent and will not promote best practice by renewable developers in NSW into the future.

### Is it really Hills of Gold?

The Independent Expert Advisory Panel for Energy Transition Report dated 14 June 2024 states that the 'The Hills of Gold site is complex and a substantial reduction in turbine numbers will reduce scale'. This may well be true.

However, if it is indeed complex, and cannot comply with our current guidelines and be viable, then the right outcome is that the project should not proceed. The Applicant has chosen a site that is ‘complex’, has ‘complex terrain’, ‘complexity of project site and interface / complexity at the point of connection’ and as a result requires more turbines (according to the Report). The alternative is that the Applicant could have selected another site where it can comply with the guidelines and be viable.

#### Supporting our regional and rural communities


The Report notes that ‘The main trade-off for decision-makers, therefore, is likely to be between regional visual amenity, noise and possibly biodiversity impacts on the one hand, and a potential precedent for upward pressure on electricity prices and slower progress towards government emission reduction targets on the other.’ (pg 23).

The Commissioners should not underplay the impact on regional and rural communities, for this and future wind projects. If we are to consider the public benefit then we should not exclude the public detriment to regional and rural communities. We should certainly not enable an Applicant who is pursuing an expensive and complex project in a manner that is not best practice, so that the NSW Government can reach its renewable targets.

If this Applicant succeeds with its current proposal of 62 turbines, this will set a dangerous precedent of ‘public interest/benefit’ that will be used not only in rural Australia but in urban sites and off-shore wind projects. For example, why should wind projects be 20 kilometers off shore when they could be much closer if the developer states the project is not otherwise viable? This will give developers carte blanche to do and say what they like in order to get their projects approved.

Our precious biodiversity, our fragile and unique environment, our rural vistas, peace and quiet, public safety and our regional and rural communities deserve better. We agree that renewable energy projects are important for NSW – but they should be done in the right places and with community support.

Regards

  
NSW

14 July 2024