

**From:** [Paul Tyson](#) on behalf of [REDACTED]  
**To:** [Do-Not-Reply IPCN Submissions Mailbox](#)  
**Subject:** Hills of Gold Wind Farm - Submission  
**Date:** Monday, 15 July 2024 7:54:51 AM

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14/07/24  
[REDACTED]  
Bangor, 2234

NSW Government  
Independent Planning Commission

I have previously made two submissions **OBJECTING** about the proposed **Hills of Gold Wind Farm**.

I feel stunned that the latest assessment by the Department of Planning Housing and Infrastructure (DPHI) has reversed their initial decision and reinstated 15 of the 17 non-compliant turbines - making the HOG wind farm a 62 turbine project rather than the DPHI's Final Assessment Report to the IPC in February 2024 for a wind farm with 47 turbines. This change of mind does not appear to be based on any new evidence about the issues of concern raised by the many submissions objecting to the proposal. The main reason appears to be that the applicant considers 47 turbines to be non-viable.

I ask the Independent Planning Commission (IPC) to reread my previous submission from February 2024. The objections which I raised at that time are, I believe, still relevant. I maintain my OBJECTION to this proposal.

At the very least the DPHI's Final Assessment from February 2024 should be reinstated.

The areas of concern which I raised in February 2024 are set out below with some further commentary included under each heading.

1. **Department response to concerns about processes.**

- This remains a significant concern to me. Transparent and accessible processes are essential for properly managed assessment. As I put forward in my February response there did not seem to be any option for the rejection of the proposal. Although in this most recent statement by the DPHI the refusal of the application could have been considered given the delays and incomplete information provided by the applicant in the EIS. The DPHI even acknowledges this in this latest Response in its Closing Comments that this project " ...as it was proposed in the EIS, had substantial issues that would have likely led to a recommendation for refusal".
- It is of concern that Engie waited until January 2024 to bring up its claim about the financial viability of the project with turbine removal. Surely they knew exactly how the financials of the project stacked up. Why were these not shared at an earlier time in the assessment process?

2. **The impact on roads**

- This most recent statement does not appear to make comments on the effect of this project on local roads. I believe there needs to be clear statements about the road upgrade requirements, who is responsible for maintenance and those responsible for those associated costs. I could not find any acknowledgement of " *the impacts of changes to traffic on Upper Hunter Roads south of the range*".

### **3. Water catchments**

- The DPHI has not responded to concerns raised about the lack of detail about mitigation strategies to prevent soil erosion. Water flows sustainability and quality are an essential part of our nations Green capital. Any interruptions could result in higher environmental and financial costs.
- There remains little acknowledgement of the potential impacts on the Isis River.

### **4. Fauna corridors**

- The recent statement appears to be dismissive of the impact of the project on flora and fauna in these corridors.

### **5. Offset practices**

- I restate my concerns raised about offset practices.
- *“Given the current concerns about the integrity of such offset schemes. There needs to be more detail about the use of offsets for the loss of native vegetation. Where are the creation of these additional areas of vegetation located? Surely it is new vegetation to replace the vegetation which might be lost and not pointing to existing areas.”*
- This is also another issue of transparency.

### **6. The Visual impact.**

- The recent statement sets out a range of assessment guidelines which have been used (or not). The whole process appears to be random/inconsistent or at worst selective to justify the change in assessment.
- It appears that Engie’s solution is to compulsorily acquire a neighbouring property so that this visual assessment concern goes away. The probity of this is questionable.
- I believe that visual amenity is not just the provenance of those who live nearby. I use the analogy of.... just because I don’t live next to a native forest the clearing of this forest does affect the overall environment.
- I restate my previous comments about visual amenity that *“I believe this misses the point that these ridges of the Great Dividing Range are essential to the character of this iconic environment. Any wind towers on a ridge such as this degrades the visual amenity.”*

### **7. Monitoring and Compliance to Recommendations**

- I continue to be concerned that the assessment does not clearly set out the *“Monitoring and compliance”* processes and requirements to ensure conformance. It should also set out corrective action processes in the case of non-compliance.

I hope that these ongoing concerns about the Hills of Gold Wind Farm proposal are seriously considered in the final decision.

Yours Sincerely

Paul Tyson