

From: [Peter Hooper](#)
To: [Do-Not-Reply IPCN Submissions Mailbox](#)
Subject: HoGWF Rejection Response July 2024
Date: Monday, 15 July 2024 9:29:16 AM
Attachments: [HoGWF Rejection Response July 2024.pdf](#)

To Independent Planning Commission

Reasons for the IPC to reject the revised recommendation by DPHI to reinstate 15 turbines so that the proposed wind farm is viable:

- 62 turbines (384 MW) is only 1.7% of 22,000 MW in NSW planning assessment pipeline
- HoGWF is therefore only marginal and not in the public interest
- reinstated turbines are dependent on voluntary land acquisition from neighbouring landowner
- reinstated turbines are non-compliant re visual, noise and biodiversity impact
- turbines are too close to Ben Halls Gap Nature Reserve and Crawney National Park
- no information on a viable and constructable access to the project
- HoGWF is not located in a NSW REZ

Refer to the attached PDF: HoGWF Rejection Response July 2024

Yours sincerely,
Peter Hooper
Morrisons Gap Rd, Hanging Rock

Response to IPC regarding the Hills of Gold Wind Farm (SSD-9679)

JULY 2024 - yet another response and submission!

Unfortunately I have no confidence that anything can be achieved by responding to the IPC at this stage in such a protracted and stressful process. But respond I must.

HoGWF is not essential in terms of capacity: Approval of turbines 53 to 62 will enable the Project to provide 384 MW. This represents, as the Department highlights, 1.7% of 22,000 MW nameplate capacity in the planning assessment pipeline in NSW. Why destroy the Hills of Gold ridge line for just 1.7% of capacity?

NSW Renewable Energy Zones: The Hills of Gold Wind Farm is *not located* in the New England REZ or the Hunter-Central Coast REZ.

Acquisition of private land for a developer: The Department has recommended “with strict conditions” the acquisition of Lot 47 DP753722, thereby establishing a precedent. During the development and planning phase the Applicant failed to acquire agreement with the landowner of Lot 47 DP753722 (the land which contains DAD01), therefore the Applicant should have either redesigned the project accordingly or abandoned it.

HoGWF is not viable with 47 turbines: The Department recommendation involves a reduction to 47 turbines (approx. 291 MW) thereby making the project *not viable*. Subsequently IEAPET confirmed non-viability of 47 turbines. Reinstatement of turbines 53 to 62 is requested by the Applicant to make the project viable at 384 MW which is only 1.7% of the 22,000 MW capacity in the NSW planning assessment pipeline. Hence the Hills of Gold wind farm is only marginal in terms of public interest.

Compensation for Applicant’s use of non-associated landowner asset: Please note that a Condition of Consent must provide an option for a Neighbour Impact Agreement to be available to non-associated neighbours at any stage during the life of the project. The Applicant is using an asset at NAD-12 (existing vegetation screening) as mitigation to obtain compliance for turbines 65, 66, 67, 68, 69, 70.

How can the project be viable if it has no access? There is no information in the current release of documents by IPC to clarify if the access is actually constructable and workable. The Crawney access to the project should provide in/out routes for all transport options thereby negating the need for Morrisons Gap Rd to be included in the transport corridor.

No OSOM vehicles on Morrisons Gap Rd! Note that the Recommended Development Consent TRANSPORT: Heavy Vehicles Requiring Escort and Heavy Vehicles Routes B31 - (b) (i) and (c) (ii) - both involve Morrisons Gap Rd and Barry Rd for OSOM vehicles to enter the project site thereby overturning the clause to use the Crawney access for all OSOM vehicles. Please revert.

Turbines and infrastructure are too close to Ben Halls Gap: The Project boundary with Ben Halls Gap Nature Reserve involves the edge of a steep ridge line which is not sufficient to accommodate eight turbines along with other infrastructure (concrete batching plant, internal road, turbine foundations, hardstands, and cabling). The proposed earthmoving and clearing within 135 metres of the boundary will seriously threaten the critically endangered Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest. All the turbines along the boundary with the Nature Reserve must be removed.

Conclusion: Approval of SSD-9679 will establish unacceptable precedents for future wind farm developments in NSW. Hills of Gold wind farm is not in the public interest, representing just 1.7% of 22,000 MW nameplate capacity in the NSW planning assessment pipeline. For future NSW wind farm development applicants SSD- 9679 provides a case study of shoddy and incompetent practice. The Department has acknowledged: *the assessment process for this project has been protracted, primarily due to delays from the Applicant in responding to matters that were material to the merits of the proposal.*

The IPC is encouraged to **reject** the application outright.