

Submission for Additional Case Material for Hills of Gold Wind Farm (SSD-9679)

To the Commissioners (Panel)

Thank you for the opportunity to make a submission to the additional case material for Hills of Gold. I object to the project. I object to the IPC approving this project.

I object on the basis of the following points

1. The Planning Department's decision to make their approval recommendations based on economic viability and public benefit rather than the merit of the project.
2. The recommendation for voluntary acquisition.
3. Engie's interpretation that DAD01 should have no weighting.
4. Addendum

1. The Planning Department's decision to make their approval recommendations based on economic viability and public benefit rather than the merit of the project.

I refer to section 2.3 Project viability / public interest in the Response to request for further information from the Department. Specifically, the Planning Department's decision to recommend reinstating 15 of the 17 turbines recommended for deleting in its recommendation in December 2023. This raises a number of questions – (i) Should project viability be a reason to disregard robust planning guidelines? (ii) Is approving this project with 62 turbines in the public interest?

(i) Should project viability be a reason to disregard robust planning guidelines?

Economic Viability is the responsibility of the applicant, not the consent authority. It is the responsibility of developers to design projects that are economically viable and adhere to the clearly defined constraints of the SEARs. This applicant, Engie, has had many years to address the merit issues of this project and design an economically viable project. They were made aware of the lack of visual and noise compliance as early as the scoping report as referred to by the Planning Department in these documents. It is Engie's responsibility to deal with these issues within the constraints of the SEARs. If that is not possible, the fundamental design of the project is flawed and should not be recommended for approval. If project designers choose locations that are inappropriate, it is going to result in economically unviable projects. The Planning Department should not be recommending approval of substandard projects based on lack of economic viability.

Communities and developers rely on the Planning Department's guidelines in the design of good projects that are going to protect communities at the same time as allowing the progression of well-designed renewable projects to accelerate the renewable transition. The public will lose confidence in the planning process if there is no adherence to well defined regulations. Instead of a transparent process, it appears to be an approval process based on the whims of those empowered to approve these projects. How can the community rely on the independence of the Planning Department if there is no clarity or transparency?

(ii) Is approving this project with 62 turbines in the public interest?

There is no public benefit to approving projects that do not comply with clearly defined guidelines. The integrity of our planning process relies on merit-based assessment of each individual project. It gives assurance to individuals and communities that their rights will be

protected. The transition to approving projects because they provide megawatts to the renewable energy transition jeopardises this integrity. It results in the loss of a robust planning process and the failure to protect the rights of individuals and communities.

There is no public benefit in marginally economically viable projects. If this project is so marginal, economically, that the removal of 2 turbines is going to render it unbuildable, it is not a good project to approve and does not provide public benefit. Approving expensive projects is going to put upward pressure on electricity prices.

It also results in the approval of projects that are unlikely to be built. “Ghost projects” are not in the public or community’s interest.

If these projects do reach financial close and are built, they are going to be built under financial pressure. This leads to the risk of cost-cutting and failure to adhere to consent conditions. Again, this does not represent a public or community benefit.

There is no public benefit in ignoring social license. As the Planning Department has pointed out, there are many projects in the planning pipeline. Approving the worst of these projects (projects that do not comply with the Planning Department’s own guidelines and SEARs) will result in increased public resistance to the project and future projects.

If landholders are aware that the developers are not required to adhere to guidelines, or that their neighbours are at risk of voluntary acquisition, they are unlikely to agree to host renewable projects. Communities are going to become increasingly resentful if they feel the Planning Department, the consent authority is disregarding individual and community rights.

2. Voluntary Acquisition should not be used as a mitigation measure to facilitate the approval of projects that lack merit.

Again, it is the responsibility of developers to design projects that are economically viable and adhere to the clearly defined constraints of the SEARs. Engie’s poor planning over a long period of time should not be rewarded by the Planning Department with a recommendation for approval with voluntary acquisition as a condition.

The use of voluntary acquisition is a violation of the rights of individuals. This is a threat to all regional landowners if this precedent is approved.

It will result in increased community resistance to projects, lack of social license and slowed transition to renewable energy.

Landowners are less likely to be open to hosting renewable energy projects if they know their neighbour are at risk of voluntary acquisition as a mitigation measure for noise and visual impacts.

3. Engie’s interpretation that DAD01 should have no weighting

The rights of existing landowners can not be ignored by renewable developers. In any community, landowners have the right to build residences in the future. This right should not be eroded by developers. Designing projects which are going to impact neighbours is not

acceptable. Putting large numbers of turbines in close proximity to non-associated landholders impacts the future rights of these landholders.

In this case, Engie has designed a project and chosen to place 11 turbines in close proximity to a non-associated landholder. This is impacting on the rights of that landholder. The fact that they did not acquire this land or secure a neighbour agreement is a major shortfall of this project. This needs to be resolved by the applicant, Engie. Failure to mitigate these impacts is not a reason for voluntary acquisition as has been recommended by the Planning Department.

In Attachment C, Engie Response to RFI 27 March 2024, Engie has shown a reckless disregard and disdain for the rights of the owner of DAD01. It appears this developer has attempted to undermine this DA in a way that must have resulted in immense personal distress and community division. This has been endorsed by the Planning Department's recommendation for voluntary acquisition.

Please see addendum below.

Rachel Greig

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Addendum 1 – Poem

I would like to finish this submission with a poem. I hope you read it in the light it is intended. It was not written as a submission, but I have decided to include it as a reflection of my thoughts on the change in the Planning Department's recommendations. I could not sleep after learning of the Department's decision to base their assessment of Hills of Gold on public interest and economic viability rather than on the merit of the project. I wrote the poem as a way clear my head and relieve some pressure. I hope it highlights the anxiety created by this shift in the Planning Department's approval process.

We had a planning system
A stickler for the rules,
Strict policy and guidelines
Their good and trusty tools.

We did not like their system,
We did not think it fair.
But at least they had a rule book
We took some comfort there.

That was until the day they said
"This rule book has to go,
This project will not go ahead,
We're going way too slow"

This project is a shocker,
It needs to get the flick.
But we're told from powers up above,
It has to get a tick.

But what about the rulebook,
The guidelines and the SEARs?
We have to burn them all they said,
And dissolved in panicked tears.

We have to tell them something,
We cannot go off script
We need a valid reason,
We cannot just backflip

We'll say it's for the greater good,
The planet will rejoice
We'll reinstate those turbines,
We'll say we've got no choice.

Sell up we'll say, and move along,
That'll fix your view,
Or plant some trees to block the sight,
You'll be needing quite a few.

We're sorry for your livelihoods,
Your heritage and land
But these projects have to go ahead
You've got to understand.

Rachel Greig

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