

From: [REDACTED]
To: [Do-Not-Reply IPCN Submissions Mailbox](#)
Subject: Hills of Gold Wind Farm Objection
Date: Monday, 15 July 2024 9:50:36 AM

To Whom it May Concern

My name is Saffron Sylvester and I am a proud young member (25) of the Timor, Crawney community. I have been working on and off in the area my whole life and my family own "Isis Hills", Timor "Morley Downs", Green Creek and "Crawney Station" at Crawney. I would like to strongly object to the changes with the reinstatement of 15 turbines - originally deemed non-compliant by the IPC December 2023. The backflip by the is of great concern. There is a reason the turbines are unviable.

Unviability

- The Independent Expert Advisory Panel for Energy Transition (IEAPET) modeling suggests that a 62 turbine layout of the project is the only viable scenario. Using IEAPET's alternative modeling all potential turbine layouts would be unviable.
- The project is so marginal that turbines previously recommended for removal for compliance with 2016 noise and visual guidelines, and biodiversity conservation have been reinstated.
 - For example, Turbine 28, which requires clearing 1.5 ha of good condition endangered ecological community Ribbon Gum Mountain Gum Snow Gum, threatened species habitat for the Koala, Barking Owl and Large eared Pied Bat has been reinstated to achieve the 62-turbine viable layout.
- The IEAPET advice states that the applicant would need to spend \$7 million on further detailed assessments to reach readiness for consideration of an investment commitment (pg 12).
- The IEAPET assumptions do not include factors that would contribute to the unviability of Hills of Gold Wind Farm:
 - Significant increases in build costs.
 - Site complexity - steep terrain, narrow ridgeline, erosion, sedimentation and mass movement risk.
 - Potential construction delays increasing costs.

Public Benefit

It is not a public benefit to approve:

- a marginal to unviable wind farm;
- a State Significant Development on unlawfully cleared land;
- Imposing Voluntary Land Acquisition on a non-associated neighbour and setting a precedent for other State Significant Developments statewide;
- A wind farm between two national parks, Crawney Pass National Park and Ben Halls Gap Nature Reserve (including Critically Endangered Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest);

A wind farm without detailed design of internal roads on steep gradient land, with high erosion, sedimentation, and mass movement risk requiring mitigation with potentially understated environmental impacts and financial liability

There is also the Bio Diversity which I am extremely passionate about and would like to keep the

pristine environment as it has been for my generation and generations to come.

Biodiversity

- Protecting biodiversity is important for Australia and the world. Recommending approval of 62 turbines prioritises private profit for a multinational company instead of biodiversity of Australian native flora and fauna.
- Many submissions asked for removal of turbines next to Ben Halls Gap Nature Reserve, yet eight wind turbines and other infrastructure like a concrete batching plant, internal road, turbine foundations, hardstands, and cabling remain. Earthmoving and clearing is proposed within 135 metres of Critically Endangered Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest that only occurs in this location.
- In a 62-turbine marginal to unviable scenario nineteen (19) Moderate risk turbines remain, including reinstatement of five Moderate risk turbines (WTG 9, 28, 58, 59, and 61) that were previously removed in the 47-turbine recommendation.
- The Community requests removal of all turbines next to the Ben Halls Gap Nature Reserve, having no confidence in the Applicant's capacity for self-monitoring of bird and bat carcasses by sniffer dogs and ecologists to inform potential curtailment of turbines, or the risk of scavenging by foxes, cats, dogs, pigs, and raptors.

Thank you for respecting our community and its concerns.

Regards

Saffron Sylvester

