

13th July, 2024

Independent Planning Commission  
Suite 15.02, 135 King St  
Sydney NSW 2000  
submissions@ipcn.nsw.gov.au  
Dear Sir/Madam,

**Re: Hills of Gold Wind Farm (SDD-9679) Public Comment**

I wish to comment on the amendments to the conditions of consent provided by the NSW Department of Planning June 2024.

1. The economic viability studies are not clear on whether they consider all the exclusions previously stated in relation to figures provided previously for this project. The figures are also calculated with many important factors still unknown such as how Bat and Bird Smart curtailment systems will affect the generation of power, construction of multiple turbines and internal access tracks on extremely steep terrain that may require specialist engineering and the increase in costs due to this project being unable to be started until the Muswellbrook bypass is in place.
2. There are also multiple other projects in REZ zones that are approved or in development phase that will provide power at a vastly reduced price. If this project is approved there is a significant risk, it will never be built.
3. Allowing micro siting of turbines within 50m of Ben Halls Nature reserve is an environmental and ecological disaster added to the location of project infrastructure and the positioning of water bores. The federal minister for the environment has declared Ben Halls Nature reserve needs to be protected for its critically endangered Sphagnum Moss Ecosystems. All turbines within 500m of the Nature Reserve must be removed.
4. Bat and Bird smart curtailment systems are not proven but rather in experimental phases. This is evidenced by the fact they are only being trialled at a small number of wind farms world-wide and their success is highly debated. There are multiple complications and inefficiencies related to their use both regarding preventing bat and bird strikes but also in relation to electricity generation. These technologies should not be relied on to protect the important species that inhabit the region of the project footprint and surrounds.
5. The Department of Planning has cherry picked the 2016 and 2023 guidelines to make a case the visual impact of the reinstated turbines 53-63 and 9-11 are for the public good. Our Property NAD33 will be visually impacted with turbines visible in 3 sectors and turbines dominating the visual landscape. The proponent and Department of Planning have disregarded this information and also failed to recognise the 2 other DAs that have been approved on Wombramurra Station our property that will be also visually and noise impacted by the reinstatement of these turbines.
6. Voluntary Acquisition of NAD 01 sets a dangerous precedent and affects the rights of all landholders. The proponent should not have been allowed to progress this project without neighbourhood agreements in place for all landholders adjoining the project footprint.

7. Lack of Indigenous Consultation and lack of indigenous studies over the proposed access Route B and the entire project footprint. The indigenous studies are incomplete and misleading the IPC should wait for findings of the Gomeri independent heritage study which will also involve members of Nungaroo LALC.
8. None of the risks identified in my previous submission and presentation to the IPC February 2024 have been adequately addressed in the Department of Plannings amended consent.
9. The independent Planning Commission should reject this project as it is in a highly environmentally sensitive area, its is economically unviable and the proponent is clearly not a model proponent. Should the financial gain for an international Company and a major landholder outweigh all other negative aspects of this project?

Yours sincerely  
Selena Sylvester



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