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To: [Do-Not-Reply IPCN Submissions Mailbox](#)
Subject: Timor, Crawney and Isis Valley Community Submission dated 14th July 2024 - Hills of Gold Wind Farm (SSD-9679)
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Timor, Crawney and Isis Valley Community Submission Hills of Gold Wind Farm (SSD-9679) - dated 14th July 2024

I make this submission once more on behalf of the concerned citizens of the Timor, Crawney and Isis Valley Communities. Details of those concerned citizens were provided to the IPC as part of the public presentations held in February 2024.

The Timor, Crawney and Isis Valley Community refer our previous submission to the IPC dated 8th of February 2024 in response to the DPHI Assessment, dated December 2023, and now this latest submission in response to the DHPI response to the IPC, dated 24th June 2024, and Engie public submissions dated, 12th February 2024.

The Community continue to **Object** to the Hills of Gold Wind Farm Development Assessment by the DPHI. The most recent response from the DHPI, rather than addressing concerns previously raised about this proposal, has actually increased those issues and concerns.

None of these previous issues have been addressed

We also raise concerns about specific statements made by Engie in their public submissions to the IPC dated 12th February 2024, which we outline at the end of this submission.

Issues that arise as a result of the DPHI response dated 24th June 2024

- The DPHI has stated in an online meeting, which I attended, and in its own Assessment Report, that Hills of Gold Wind Farm will be assessed using the 2016 WE Guidelines. Yet, it has used the 2023 Draft Guidelines where it chooses, and supposedly as an “exercise”, which is then used to reinstate turbines.
- Non-Compliant Turbines 9 -11 were removed under the applicable 2016 Visual Guidelines, as non-compliant to benefit Crawney and Timor Landholders amongst others.
- Now they are returned in a mishmash of applicable 2016 guidelines and the unratified and non-applicable Draft 2023 WE guidelines. The non-applicable draft 2023 Guidelines are not yet ratified may still be further altered.
- So we have the completely ludicrous situation that non-compliant Turbines, per the actually applicable 2016 Guidelines, are being justified and recommended for reinstatement using the unratified, inapplicable draft 2023 WE guidelines.
- Reinstating Turbines 9 - 11 will magnify the erosion impacts to the narrow Ridgeline of the fragile Great Dividing Range.
- The Community ask that these Turbines be removed, per the December 2023 Assessment, to prevent damage to the Isis Valley River systems
- For consistency, If DPHI insist on using the 2023 Draft WE Guidelines, then ALL aspects of the entire project should be reassessed against those draft guidelines, including reassessment and new assessments of all of the Homesteads and Dwellings, many of which have not been previously identified, and the Environment within the Isis Valley. The updated Assessment should then be opened to public exhibition once more. To use the guidelines only when it suits lacks integrity and could be perceived as bias.

Additionally

- Voluntary Land Acquisition is being imposed on a non-associated neighbour creating a dangerous precedent. The landholder CDC entitlement proceeded the issue of the DA by Engie. They should have accounted for it.
- The proponent still does not have legal access to the site
- A development that hinges on the inclusion of one Turbine to remain viable, for example #28, is unviable. How unviable will this Proposal become once the detailed designs and costs start to be properly assessed? This will be a disaster.

Impacts to the water systems of the Isis Valley remain the chief concern for the Community:

- Recommending approval of 62 turbines results in increased clearing of vegetation on the range and reduces the infiltration of rainwater into the soil for release via springs into creeks and rivers. Concerns remain that the Applicant and DPHI do not understand and have not assessed nor considered the importance of the range as a water holding sponge.
- Soil scientist, Greg Chapman, who presented to the IPC, has warned that there has not been adequate detailed design to understand the extent of mitigation to avoid erosion, sedimentation and mass movement that could result in higher environmental and financial costs.
- The disturbance of phosphorous carrying soils without appropriate erosion mitigation, has the potential to cause Toxic Algal Blooms in the Peel, Isis and Hunter River systems and the downstream Glenbawn and Chaffey Dam water catchments.

The community believe that the DPHI Assessment is deeply flawed, providing strong grounds for appeal, and has only resulted from pressure from an aggressive proponent that seeks to force decisions through threats and intimidation, but which actually seek to cover for the litany of failures that they themselves have brought upon themselves in their inability to do the necessary due diligence to comprehend the sheer complexity of the necessary design required to develop a singular plan for this proposal.

Timor, Crawney and Isis Valley Communities, draws the IPC attention to the **Hills of Gold Preservation Inc** submission for this round, and advise the IPC that the Community South of the Range fully endorse that submission.

In summary across both submissions

Building WindFarm infrastructure in non-REZ areas, with none of the associated supporting infrastructure, just magnifies the impacts on local communities and individuals. In addition to the WindFarm development itself, communities are also impacted by bespoke, and often inadequate supporting infrastructure developments such as roads, powerlines etc; Non-REZ areas should be excluded from this type of development.

The response to IPC by DPHI dated 24th June 2024, has actually increased the grounds for the Community objections, rather than addressing any of the previously raised issues.

This is an:

Unsuitable Development, in an under serviced area, posing unacceptable risks, and should be Rejected. Nothing in the latest DPHI response to IPC dated 24th June 2024 has addressed these risks, instead it has simply magnified them.

We ask that the IPC **Reject the Hills of Gold WindFarm** proposal.

Appendix: Engie Submissions dated 12th February 2024

The Community provides the following feedback, though not exhaustive, on statements in the Engie documents dated 12th of February 2024, as follows:

Engie - Written Submission - Annexures - HOGPI / Timor Community Response 12th Feb 2024

Page	Area	Assertion	HOGPI / Timor Community Feedback
4	NAD 70 - CJ	• 40 interactions with this landowner	NAD 70 was not offered a Neighbour

	and MC Eagles - 5.75km	from March 2018 to December 2023 • 1 face to face meeting • 4 phone calls • Neighbour benefit sharing program offered	sharing Program
	NAD 99 - CJ and MC Eagles		No interaction with Engie specific to this residence. The dwelling was only identified after it was brought to the attention of Engie.
	John McIntyre		Dwelling not identified and No interaction with Engie specific to this residence
	Ian and Jenny Vaughan		Dwelling not identified and No interaction with Engie specific to this residence
	Kerry and Sandra Weaver		Dwelling not identified and No interaction with Engie specific to this residence
	Amongst others		Dwellings not identified and No interaction with Engie specific to this residence
Annexure 6 Page1		Securing Stewardship Sites: Initially, nine properties were considered for stewardship sites, encompassing over 8500 hectares. Following field assessments, detailed discussions with landowners, and further biodiversity surveys, three sites have been secured to conserve up to 800 hectares across separate stewardship sites. These sites strategically enhance local habitat connectivity, contributing to the conservation efforts between Wallabadah Nature Reserve, Crawney Pass National Park, and Ben Halls Gap Nature Reserve	Three separate sites do not constitute inter-connectivity. These sites do not replicate the fragile subalpine biodiversity of the Great Dividing Range. The Wildlife corridor will be destroyed.
Annexure 10 Bushfire	BushFire	(f) Engagement with Timor RFS: The Project engaged with Timor RFS representatives when organising and hosting a community information session and barbecue at the Timor RFS sheds with the brigade captain in attendance as well as a group captain.	This was the first community meeting held by Engie with the Timor Community in April 2021 (six months after the EIS was released - breaching NSW WE Guidelines 2016). The meeting was held at the Timor Bushfire shed, however, the Captain and Group Captain did not attend in any official capacity. To infer that somehow this meeting constitutes consultation with the Timor RFS brigade on the bushfire impacts of the Proposal is not correct. The use of the RFS official logo in promoting this meeting was the source of an official complaint by the NSW RFS.
Annexure 10 Bushfire	BushFire	(g) Sponsorship of NSW Rural Fire Service, Liverpool Range: Our sponsorship grant of \$2,000 towards the Liverpool Range RFS demonstrates our support for local firefighting efforts and community resilience. By contributing to the completion of their mobile catering	The offering of sponsorship incentives to the NSW RFS (a NSW government authority and key contributor to the assessment process) during the Planning Process for the HOG Farm was reported to ICAC. The matter was referred by ICAC to the NSW Rural Fire Brigade Commissioner for

		unit, we aim to enhance their capacity to respond to emergencies and support volunteer firefighters during critical operations.	investigation.
Annexure 8	Geotechnical and site constructability	Extensive geotechnical analyses within the Project area have been undertaken to date, marking a significant milestone for a development at this stage. As outlined below, these investigations have enabled a strong understanding of the geological profile and soil characteristics within the Project area, and on this basis the Proponent expects the western access route will align with established findings. Geotechnical studies along this route are scheduled for the detailed design phase.	How do we know if this is true? Has it covered all land form elements on the development footprint? Has it covered all slope classes on the development footprint? Has it representatively sampled all lithologies and geological formations within, and buffered around, the development footprint To answer this we really <u>need a map showing location</u> of the investigation sites, along with 10m interval contours, superimposed on best publicly available geological mapping. Are the sites biased towards flat areas where equipment can easily excavate?
Annexure 8	Geotechnical and site constructability	During the initial phase of similar wind farm developments, high level geotechnical investigations are standard to acquire a fundamental understanding of the site. The Proponent has far surpassed this baseline with significant quantities of testing commissioned within the Project area: this conservative approach included conducting 51 test pits, 23 boreholes, installing 7 groundwater monitoring standpipes, and carrying out 17 electrical resistivity (ER) tests, 20 thermal resistivity (TR) tests, 4 land seismic refraction profiles, 2 multi-channel analysis of surface waves (MASW) profiles, and analysis of 181 laboratory samples. The comprehensive testing and on-site evaluations undertaken provide a high degree of confidence that there are no class 8 or other problematic soils present within the Project area.	<p>When were these established? Was there sufficient opportunity to include these in an amendment to the GIS? If so when why not? If the results were as re-assuring as they are purported to be, then why have they not been published and made available?</p> <p>It is customary in all professional geoscience based reports, including EIS, and one would assume submissions to the IPC, to include pit and borehole logs and to present the actual laboratory data in an appendix. Why was this not done?</p> <p>Yet the data remains mysterious. The quality of the data cannot be assessed, and it cannot be examined because it is absent. With no analysis everyone, including the Commissioners are just left with what could perhaps be interpreted as patronising and condescending statements that there is nothing to worry about. Coming, without data, such statements may indicate a different expectation for those with worldly experience.</p> <p>If there is a consistent geological profile then where is it? What does it look like?</p>
Annexure 8	Geotechnical and site constructability	The testing performed has revealed a consistent geological profile, indicating that the subsurface conditions of the site are well-characterised. It is therefore expected that the access route from the western side via Crawney Road will align with these established findings. Moreover, the accomplished work provides	- what are they? A reasonable expectation would be that the requirements include serious consideration and plans: to prevent mass movement, (once again not mentioned, addressed or assessed) prevent soil erosion and (once again not addressed or assessed) prevent deterioration of water quality.

		substantial confidence that pre established requirements will be satisfied.	<p>Legitimate concerns about high phosphorous levels in the soil have been raised but are still not addressed. It is doubtful if there was any testing of available or total phosphorous in any of the 160 odd soil or regolith samples.</p> <p>The blinkers of constructibility seem to restrict broader considerations of environmental impact. This is not just about constructibility but should encompass an honest assessment of environmental impact stemming from both the terrain and the interaction of the terrain with the development. A reasonably detailed and data rich assessment has still not been provided.</p>
Annexure 8	Geotechnical and site constructability	<p>During the initial phase of similar wind farm developments, high level geotechnical investigations are standard to acquire a fundamental understanding of the site. The Proponent has far surpassed this baseline with significant quantities of testing commissioned within the Project area: this conservative approach included conducting 51 test pits, 23 boreholes, installing 7 groundwater monitoring standpipes, and carrying out 17 electrical resistivity (ER) tests, 20 thermal resistivity (TR) tests, 4 land seismic refraction profiles, 2 multi-channel analysis of surface waves (MASW) profiles, and analysis of 181 laboratory samples. The comprehensive testing and on-site evaluations undertaken provide a high degree of confidence that there are no class 8 or other problematic soils present within the Project area.</p>	<p>No class 8 soils. Is that for mass movement assessment or is it for water erosion assessment? [not specified] What criteria were used? We don't believe that any of this was properly assessed.</p> <p>Class 8 for mass movement is based on evidence of: previous mass movement (slopes which have slipped are likely to move again Slope - which we know is in many places very very steep Soil type - basalt CH soils are known to be a particular hazard Interestingly 51 soil pits are not required to map LSC as being class 8. Just examining the terrain and slope is sufficient. So why include the statement that there is no class 8 on site?</p> <p>There are the criteria for assessing water erosion hazard for LSC, from the NSW government:</p> <p>The reference for the LSC assessments is:</p> <p>https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Land-and-soil/land-soil-capability-assessment-scheme-120394.pdf</p> <p>Tables below indicate criteria for assessment of mass movement and assessment of water erosion hazard. (see tables in letter to Commissioners from Greg Chapman dated 14th February 2024)</p>

Engie Written Submission - Letter - HOGPI / Timor Community Response 12th Feb 2024

Page	Area	Assertion	Community Feedback
2	Project Viability	It is important to note that the series of refinements that occurred between 2018 and 2022 were not in the interest of improving the economic viability of the Project, but to improve, where reasonable and feasible, any biodiversity and/or visual impact outcomes.	Many of the Turbines that were removed during planning process where in unviable locations (such as on steep slopes) that would never have been able to be built.
	4 DPHI's flawed approach to weighting visual impacts	(c) even if (again, contrary to our submissions) the IPC considers that DPHI has applied the correct balancing test to weight impacts, the IPC has a clear legal power to impose a voluntary land acquisition condition rather than to adopt the Draconian measure suggested by DPHI of deleting turbines from the Project (see section 5 below).	Is it now that proponents can threaten the DPHI, during the public submissions, and this is somehow acceptable?
			Quoting untested legal precedences from 2007 demonstrates a desperate proponent

Engie - Written Submission - Moir Report - Community Response 12th Feb 2024

Page	Area	Assertion	HOGPI / Timor Community Feedback
	Landscape Character	42. It is reasonable to state that, broadly, the landscape character of the site is a pastoral landscape that has been shaped by the dominant land use since European settlement. The landscape is primarily not a natural landscape but generally a highly modified landscape altered through various land management regimes for agriculture and forestry as a commercial activity.	It is not reasonable to assess the character of the Great Dividing Range as being largely pastoral. Moir need to get out of the Office and view the Range from the South. Part of the Project area was not shaped because of European settlement, but because the area was unlawfully cleared during the planning process. The Great Dividing Range is just that, Great.
	Landscape Character	Moir Assess the Visual values South of the Range as "Moderate"	Moir did not adhere to the Visual Guidelines 2016, as they determined the Visual values themselves South of the Range, without <u>ANY consultation</u> with the local communities. This is in clear breach of the WE 2016 Visual Guidelines. For Moir who didn't adhere to the 2016 guidelines to criticise DPHI for being somehow subjective in their assessment, when they did exactly the same thing when assessing the Visual values South of the Range, is just hypocritical.

Engie - Written Submission - Biosis Report - Community Response 12th Feb 2024

Page	Area	Assertion	Community Feedback
4		Part of the assessment undertaken by Environmental Geosurveys included communication on the potential for local caves to support microbat populations with academic and expert speleologist—Dr Susan White of La Trobe University), illustrating 14 known caves with microbats known to be present, in the Tamworth area	There are more than 100 caves in the immediate vicinity of the Hills of Gold proposal. The Actual Bat populations have not been determined and the impacts have not been accurately assessed. Dr Susan White is in Melbourne and was asked about caves in Tamworth.
4		Further communication on the potential for local cave systems to support microbat populations, based on publicly available	Garry Smith, President of the NHVSS, was contacted by BIOSIS. He advised that there were many caves in the area and that a

information, was undertaken by Biosis with a number of members of the broader speleological community in early 2020. These communications yielded little in the way of definitive information on microbat populations that could be used in the project's biodiversity impact assessment

thorough survey should be undertaken. Within email correspondence he offered to accompany assessors to help locate caves which they would not have been able to locate. This did not happen and as such a completely untrue picture of the bat and cave systems was presented.

Thank you

Chris Eagles

“Alston”

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Find us online:

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