



# HILLS OF GOLD PRESERVATION INC 1800437

## OBJECTION TO THE NOVEMBER 2022 AMENDED DEVELOPMENT APPLICATION FOR HILLS OF GOLD WIND FARM SSD-9679 EXH-50789958



Public Meeting hosted by DPE, October 2018

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*"If the community doesn't want it [wind farm], it won't happen"*

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Wind Energy Partners Pty Ltd consultant John Wilcox (Inclusive Engagement), meeting with five community members, February 7, 2018

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Photography by Andrew Pearson ©

***We acknowledge the Traditional Custodians of the land on which we live, the Kamilaroi people. We recognise their continued connection to the land and waters of this beautiful place and acknowledge that they never ceded sovereignty. We respect all Kamilaroi Elders and Ancestors and extend that respect to all First Nations people.***



*Turbine montage depicted at Nundle Road/Linsdays Gap Road intersection*

## **Hills of Gold Preservation Inc Fifth Annual General Meeting Motion** **August 2022**

At its fifth Annual General Meeting and 17<sup>th</sup> General Meeting Hills of Gold Preservation Inc members unanimously passed the following motion:

*“Hills of Gold Preservation Inc members have thoroughly assessed Engie’s Hills of Gold Wind Farm proposal.*

*“The local majority view of this community is to oppose this proposal as not in the public interest. The solidarity of our members is demonstrated by a group photograph of available members at Nundle Recreation Ground.*

*“Our members’ position is based on reading all documents associated with the proposal, including the Scoping Report, Business Contact Forms, EIS, CCC minutes, Response to Submissions, newsletters, and website, as well as other NSW wind farm EIS documents, CCC minutes, and websites.*

*“It reflects four and a half years of engagement with the proposal, including establishing an incorporated group, attending General, Executive and Annual General Meetings, as well as state government renewables industry forums.*

*“HOGPI members have participated fully in the democratic process and provided evidence of local majority opposition in an overwhelming number of EIS Objections from impacted LGAs.*

*“This was supported by Member for Tamworth Kevin Anderson’s survey of residents.*



*“Members have contributed to State Government renewables and guideline reviews.*

*“This decision represents a final and formal informed community position of no social licence for Engie’s Hills of Gold Wind Farm.”*



*On the 9th April 2022, six generations of neighbours from Nundle, Hanging Rock, Crawney and Timor came together to share their experiences of the past four years opposing Engie's Hills of Gold Wind Farm.*





*Aerial shot of community gathering on April 9, 2022*

# Key Project Truths



**Hills of Gold Wind Farm proposes serious environmental destruction in a sensitive ecological location.**

## **Invitation:**

Please attend an Important Public Meeting to discuss red flag concerns about Hills of Gold Wind Farm Amended Development Application on Public Exhibition for your comment until Tuesday, December 13th.

## **Save the Date**

5.30pm, Tuesday, December 6th, 2022  
Nundle Memorial Hall  
Hosted by Hills of Gold Preservation Inc



**TAMWORTH REGIONAL  
COUNCIL OBJECTS  
TO PROPOSAL**



**46.2**  
HECTARES OF  
**Koala  
Habitat  
DESTRUCTION**  
\*CRITICAL TO SPECIES SURVIVAL



**MAJOR  
ROAD &  
INTERSECTION  
MODIFICATION  
FOR NUNDLE VILLAGE**



**ALL OVERSIZE  
OVERMASS**  
VEHICLE MOVEMENTS THROUGH  
RESIDENTIAL STREETS OF NUNDLE



# Key Project Truths

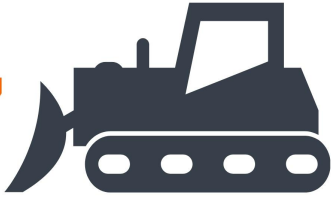


**447**

HECTARES

**CLEARING of  
VEGETATION**

\*PLUS CLEARING FOR ACCESS ROADS



**EXTREME  
CUT & FILL ROADS  
CARVED INTO FACE  
OF THE RIDGELINE**

\*INCLUDING UP TO 10 METRE HIGH  
VERTICAL BATTERS PROPOSED  
FOR RIDGELINE

**BIRD AND BAT  
STRIKE  
THREAT  
UNRESOLVED**



**56**

**RED OBSTACLE  
LIGHTS  
ILLUMINATING  
THE RIDGELINE AT NIGHT**



**HIGH VISUAL  
IMPACT**

**64 TURBINES ON  
ELEVATED RANGE**



**AERIAL  
FIREFIGHTING  
SERIOUSLY  
COMPROMISED**

**PRESERVE  
HILLS OF GOLD**



# Key Project Truths



LOCAL ONGOING  
**JOBS  
ESTIMATE**

NOW  
LESS  
THAN

**5**

SOURCE: SGS ECONOMICS AND PLANNING



**NO  
PARKING  
ZONES**

INTRODUCED ALONG  
OAKENVILLE & JENKINS  
STREETS



**SERIOUS  
THREAT**

TO BIODIVERSITY  
& NATURAL  
HABITATS

\*BEN HALL'S GAP NATURE  
RESERVE HIGHLY COMPROMISED  
BY TURBINES

**NO EVIDENCE OF  
CONSTRUCTABILITY  
ON STEEP  
VULNERABLE  
LAND**



PRESERVE  
HILLS OF GOLD



# Key Project Truths

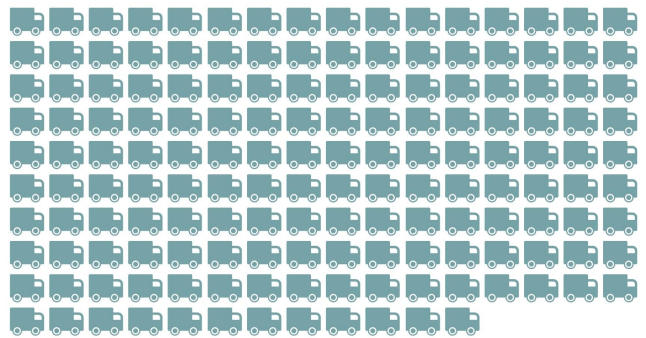


## INCREASED RUNOFF AND RISK OF



## 156 DAILY TRUCK MOVEMENTS

WITH **101 TRUCKS PER DAY**  
THROUGH HANGING ROCK  
VILLAGE



Make an objecting submission to the Hills of Gold Wind Farm Amended Application (SSD-9679) before Tuesday, December 13th.

Address your objection to: Director – Energy Assessments,  
Development Assessment,  
Department of Planning and Environment,  
Locked Bag 5022,  
Parramatta NSW 2124

or visit the Major Projects Planning Portal:

<https://www.planningportal.nsw.gov.au/major-projects/projects/hills-gold-wind-farm>

If you would like help understanding, writing or lodging an objection to Hills of Gold Wind Farm Amended Development Application please attend our Public Meeting or call into the Hills of Gold Preservation Inc office open daily 10am – 4pm at Nundle Guitars, 62 Jenkins Street.

Tamworth Regional Council has objected to Hills of Gold Wind Farm because of concerns about extreme changes proposed for roads and road delapidation, reduced biodiversity from wind turbine barrier effects and vegetation clearing, heritage and visual impacts, and social division.

All these impacts remain with the Amended DA. There is no acceptable route to the proposed project area because of the steep and vulnerable topography, heritage character of Nundle and surrounds, and the tourism businesses and visitors, and lifestyle properties it attracts. Talk with our members and add your voice to preserving Nundle, Hanging Rock, Crawney and Timor.



## HILLS OF GOLD PRESERVATION PUBLIC MEETING – DECEMBER 6, 2022



### Pressure on wind farm debate to resolve

BY EVA BAXTER

THE development of a wind farm in Nundle has cut the town in two for five years and shows no signs of slowing after a town meeting.

Both parties want a decision made.

More than 70 residents from Nundle, Hanging Rock, Timor, Oakville and Tamworth met on Tuesday evening to share concerns found in the amended development application for the Hills of Gold Wind Farm.

The project is on public exhibition for the second

time until December 12 following amendments made to transport routes, which concerned community and council.

The town meeting was held because Engie refused to host one, Hills of Gold Preservation Inc secretary Megan Trousdale claimed.

"That's what the community does, when there's a significant issue that needs to be communicated," she said.

There are a number of concerns present in the amended DA, she said.

These include disturbance to soil upon the range; 486.45

hectares of vegetation set to be cleared, which includes koala habitat; the new proposed transport route runs on a private road; bird and bat strike threat; proximity to a nature reserve, and more.

The local majority oppose the windfarm, but want government bodies to make a determination, Ms Trousdale said.

"We want this to be resolved," she said.

The "vocal" group of opposition members continue not to engage with Engie, the company's senior management of community engage-

ment Jacqui Neimand said.

The project is an important part of the government's renewable targets, she said.

"That ridge is one of the windiest locations in NSW," she said.

Nundle publican Robert Schofield supports the wind farm, because it will be good for his business, and revitalise the town.

He's keen to see the divisive issue resolved.

"I am just so sad to see what's happened to the town," he said. "Whichever way it goes, let's all get back to living in the place."



Hills of Gold Preservation Inc executive member Ian Worley spoke at the first formal public meeting on the wind farm since October 2018. Picture supplied

Public Meeting hosted by Hills of Gold Preservation Inc on Tuesday December 6th, 2022 at Nundle Memorial Hall after Engie refused to hold one and provide detail about the Amended Development Application. Engie representatives did not attend the Public Meeting, despite being in Nundle on the day the meeting was held. This was the first Public Meeting about the proposal since a DPE hosted meeting in October 2018.

## SUMMARY OF UNRESOLVABLE IMPACTS

Issues raised by community members nearly five years ago at public meetings in March 2018, remain Unresolvable Impacts today.

One major turbine host landholder, Wind Energy Partners' Pty Ltd, and now Engie, have forced a renewables development on a local community majority that does not give its consent. Tamworth Regional Council has objected twice.

The topography of Nundle, Hanging Rock, Crawney, and Timor is simply not suitable for such a large-scale industrial development. The environmental, visual, noise, heritage, traffic and transport, aerial firefighting and social costs are not acceptable.

Further turbine removal would be required for compliance with:

- Visual Impact Guidelines;
- Noise Impact Guidelines;
- NPWS request for removal of turbines on Ben Halls Gap Nature reserve boundary; and
- Upper Hunter Shire Council Development Control Plan.

Wind Energy Partners Pty Ltd and Engie failed in their due diligence to assess the social licence and constructability of this proposal. Instead, their representatives have acted in an arrogant, entitled manner, as if the proposal is a done deal before it is even developed or assessed.

Engie is negligent in continuing to deny major local community opposition, and propose a wind farm in steep and vulnerable topography. Responsible corporate citizenship should see Engie withdraw the proposal and channel its resources into building or expanding approved renewables projects, or proposing greenfield renewables away from national parks, and an opposing local majority.

Hills of Gold Preservation Inc members understand that the State Significant Development assessment process is based on the practice of Avoid, Mitigate, and Offset. However, when a proposal is located in challenging, inappropriate topography and ecologically sensitive location there should be the capacity to Stop it progressing through the assessment pipeline.

Otherwise it is an unacceptable burden on a small community (and Council) to gain an understanding of the National Electricity Market, NSW State Significant Development Assessment, and an evolving proposal over years.

This is the second Public Exhibition period associated with this proposal and our members are appalled at the continuing sloppiness of the Amended DA. Important information central to the understanding of the environmental implications of the proposal are missing. The burden falls on community volunteers to use their micro local knowledge, read documents and call out inconsistencies, mistakes and omissions. Our time is being wasted.

The 28 day exhibition period is not enough time to read and analyse the Amended DA documents. It has caused enormous amounts of stress for community members to give up family, business and community time. However, Hills of Gold Preservation Inc did not apply for an extension because the alternative of having the Public Exhibition period hanging over our families during the Christmas and School Holidays would be worse.

Here we are nearly five years into this process and we have had enough. Our members have volunteered thousands of hours reading documents and attending meetings associated with Hills of Gold Wind Farm since February 2018. Our volunteers will never have that unpaid time back. It is lost family time, lost employment, lost volunteering, and lost leisure. Hills of Gold Preservation Inc members ask that the Department of Planning and Environment recommend rejection of Hills of Gold Wind Farm and allow our community to recover from this trauma.

Our members draw the Assessment team's attention to the following Continuing Unresolvable Impacts associated with Hills of Gold Wind Farm.

## **(i) BIODIVERSITY**

- Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest was listed as Critically Endangered under the EPBC Act on 5th October, 2022. The implications of this are not reflected in the Amended DA lodged more than a month later.
- It is unacceptable to disturb 447 hectares of vegetation for a renewables development. Biodiversity Offsets and Biodiversity Stewardship are not acceptable and do not prevent reduced biodiversity.
- It is unacceptable to propose clearing 46.2 ha of koala habitat that is critical to the species survival while at the same time Phil Spark is studying the significance of the range, including Crawney and Hanging Rock, for remnant breeding populations following the serious decline of koalas at Gunnedah.



- The proponent's biodiversity assessment does not account for part of the proposed wind farm being located on unauthorised cleared land, which resulted in a Set Aside Conservation Agreement co-signed by Wind Energy Partners Pty Ltd Directors Colin Liebman and Jamie Chivers in August 2020.
- Does the proponent's November 2022 biodiversity assessment include mosaic land clearing (thinning) on Wombramurra Mountain, approved by North West LLS for agricultural purposes that subsequently mutually benefits the construction and operation of wind farm infrastructure?
- The proponent does not adequately address further vegetation removal, and associated biodiversity impacts, required for maneuvering lengthy blades on the proposed transport routes.
- It should be noted the majority host landholder completed major road upgrades, including the widening of roads, tree removal and the installation of concrete pipes to roads on Crown Land now proposed as Option 1 & Option 3 in the Amended DA.
- The construction of these road upgrades occurred during the period of the assessment for a SSD. These road upgrades were brought to the attention of the DPE via email, and Engie representatives during two Community Consultative Committee meetings, to which they replied these roads have nothing to do with our Development Proposal.
- Removal of WTG 41 and minor movement of 19 WTGs does not remove the barrier effect to birds and bats returning to home roosts between the project area and Ben Halls Gap Nature Reserve. It is completely ineffective to then suggest that the proponent be allowed to move wind turbines within 100m of their proposed location. Will they be moved back? Will the proponent submit a Modification if the proposal is approved?
- RFS confirmed aerial firefighting near wind farms is at pilot's discretion. This is not acceptable for protection of Ben Halls Gap Nature Reserve or Crawney Pass National Pass biodiversity, or human lives and property.
- The most reliable and highest water source for helicopter refilling on "*Nycooma*" will not be available for aerial firefighting due to the siting of infrastructure and turbines requiring water for helicopter refilling from a much lower altitude requiring a considerable climb and longer turnaround time.
- The proponent does not address the environmental impact of replacing at least four bridges between the New England Highway and the project area (with four other bridges on transport route options not addressed at all, Nundle Creek Bridge, Pearly Gates Bridge, Oakenville Creek Bridges on Jenkins Street and Old Hanging Rock Road).
- The proponent does not address the impact of the proposed transport route or 64 wind turbines and infrastructure to the experience of nature tourism in and surrounding Nundle, Hanging Rock, Crawney and Timor.

## **(ii) SOIL AND WATER**

- The proponent fails to demonstrate understanding of the importance of the Upper Peel Catchment to the water security of Tamworth.
- The proponent does not reference the October 5th EPBC Act listing of Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest as Critically Endangered with regard to potential indirect ecosystem sedimentation, weed, and pathogen risks.
- The proponent does not provide detailed geophysical analysis of turbine, Transverse Track, Western Connector Road and associated infrastructure location to demonstrate the constructibility and viability of Hills of Gold Wind Farm.
- The proponent fails to address flooding mitigation within the proposed project area or access.

## **(iii) ACCESS**

- There is no acceptable transport route to the project area in the vicinity of Nundle, Hanging Rock, Crawney or Timor due to the distinctive highly scenic, steep and vulnerable topography, and the heritage and nature based tourism, and lifestyle properties it attracts.
- Tamworth Regional Council has stated that it does not support significant modifications to Morrisons Gap Rd and Barry Rd and potential for “disruptive and dangerous catastrophic pavement failures” and does not give consent under Section 138 Permit of the Roads Act 1993.
- The proponent does not identify that a section of Morrison’s Gap Rd, a public road, travels through six wind turbines, and turbine tracks cross the public road. Public safety is not addressed concerning blade glint, shadow flicker, ice throw, blade throw or a turbine falling over.
- The proponent does not address the existing sink circle causing closure of Barry Rd and a detour in place for more than 12 months.
- Barry Rd currently has large sections of pavement missing near Devil’s Elbow, not fit for purpose for carrying returning OSOM vehicles, 35% of 156 daily truck movements, or an additional 311 daily light vehicle movements during the forecast two-year construction period.
- The proponent does not address undercutting of Oakenville Creek Bridge on Old Hanging Rock Rd following a 100mm rain event on Tuesday, November 1st, 2022.

- The proponent provides no information about Oakenville Creek Bridges on Old Hanging Rock Road or Jenkins Street.
- The proponent does not acknowledge the disruption to Nundle and surrounds residents, businesses and public services caused by No Parking Restrictions of one lane of Oakenville St and Jenkins St during OSOM blade deliveries.
- The proponent does not have private landholder permissions in place to enable the proposed Nundle Loop route (Oakenville, Old Hanging Rock Rd, Happy Valley Rd, River Rd, Jenkins St, Crawney Rd).
- The proponent does not address the impact of 311 additional daily vehicle movements from Tamworth on Nundle Rd or Garoo Rd/Lindsay's Gap Rd dilapidation, or residents and businesses.
- The proponent does not address that the paddock behind The Peel Inn is currently used for the business's waste water/sewage dispersal. Is a waste water/sewage dispersal system and private road/car park compatible?
- HOGPI members are concerned that the proponent's proposed Nundle Bypass private road is not compliant with TRC's Development Control Plan regarding corner access from public to private land.
- The proponent does not address how the Nundle Bypass private road would enter and exit public roads at Oakenville Street, Innes Street or Jenkins Street.
- The proponent does not have permission from TRC for use of Herring St North, Innes St, or Jenkins St for the Nundle Bypass behind The Peel Inn.
- The proponent does not address how the OSOM route or proposed private road would impact public recreation areas including the Riverside Park, Nundle Sport and Recreation Ground, and Riverside Walk.
- The proponent does not address the drainage or flooding implications of building up a private road behind The Peel Inn or the impact on neighbouring properties including Jenkins Street Guest House, Odgers and McClelland Exchange Stores and private residences.
- The proponent does not have an Indigenous Land Use Agreement in place regarding undetermined Nungaroo Local Aboriginal Land Council land claim on Crown Land that would provide access from Crawney Rd to the Project Area.
- The proponent does not consider the environmental value of the Crown Reserve and C2 Land Zoning (Environmental Conservation) Tamworth LEP 2010.
- The proponent has not provided evidence of the constructability of a "Western Connector Road" on steep and vulnerable topography, that is vital for access for Oversize Overmass vehicles from Crawney Rd to the Project Area. Nearly five years after the proposal was made public, there is no evidence that the proponent can transport



OSOM vehicles on steep and vulnerable land to the project area. There is no analysis by Rex J Andrews Engineered Transport or The Transport Planning Partnership.

- The proponent has not provided evidence of the constructability of a “Transverse Track” that is vital for the movement of vehicles within the Project Area and provides access to the Eastern side of the project for OSOM vehicles.
- There is no analysis by Rex J Andrews Engineered Transport or The Transport Planning Partnership of the Western Connector Road or Transverse Track.
- Rex J Andrews Engineered Transport has assessed that Extreme Work is required for Road Modification, Road Furnishings, and the Site Entrance associated with Hills of Gold Wind Farm Amended Development Application.
- “Significant Amounts of Modifications Required” is the assessment for two sections of the proposed route at Muswellbrook, bridges at Goonoo Goonoo Creek and Middlebrook Creek on Lindsay’s Gap Road, connecting Oakenville and Jenkins Streets, Back Creek Bridge, site entrance off Crawney Road, Option1 in the Amendment DA, requiring a new bridge across Wombramurra Creek and the upgrade of the bridge at Teamsters Rest before Option 3 access, note: this bridge has been recently upgraded by NSW Government funds.
- This new bridge proposed to cross Wombramurra Creek at Option A & B of the Amended DA would need to be substantial to not only carry the loads of OSOM vehicles, but to avoid recurring flood waters that swell Wombramurra Creek regularly as part of a water catchment area, flowing to the Peel River.
- The proponent has not checked the load capacity of Nundle Creek and Pearly Gates Bridges even though Rex J Andrews Engineered Transport provided Transport Drawings in the Route Study.
- The proponent has not considered the potential impact of flooding on site access, road damage, and construction delays. Nundle experienced isolation due to flooding as recently as Tuesday, November 1st following a more than 100mm rain event in the catchment. Commuting, mail delivery and high school bus travel was disrupted for three days following closure of Oakenville St at Nundle, and Nundle Road at Woolomin, Dungowan and Piallamore. Wombramurra Creek and the Peel River broke their banks.
- Section 75 of the LLS Act only allows approval of one access through the Crown Reserve. Consequently Option B greenfield access would require removal of Option A.
- The proponent does not detail the impact of construction traffic for the switching station, transmission lines, towers and easement from Basin Creek Rd, Back Creek Rd or Old Wallabadah Creek Rd.
- Traffic and Transport Impacts associated with construction and operation of the Switching Station and Transmission Lines/Towers/Easement to residents on Wallabadah Creek Road and the New England Highway have been ignored.

## (iv) HERITAGE

- Nungaroo Local Aboriginal Lands Council, which has an undetermined land claim on Crown Land between Crawney Rd and the project area, has not communicated its support for the proposed Hills of Gold Wind Farm or negotiating access.
- The proponent does not address the impact of the proposed transport route or 64 wind turbines and infrastructure to the curtilage of heritage listed properties and associated heritage tourism in and surrounding Nundle.
- The proponent does not address the impact of the proposed transport route or 64 wind turbines and infrastructure to the experience of the Bicentennial National Trail on and surrounding Forest Way, Barry Rd, Old Hanging Rock Rd, Oakenville St, Jenkins St, and Crawney Rd.
- The heritage value of the DAG Sheep Station in its current form cannot be dismissed by the proponent as an unlisted heritage building. The Woolshed complex consists of the original Wombraumurra Woolshed and shearing complex dating back pre 1906.
- The heritage and cultural value of the DAG Sheep Station to Nundle and Tamworth Region is substantial.

## (v) VISUAL AMENITY

- **The proponent does not address the visual impact of the Nundle Bypass or Loop Rd on the village of Nundle and does not provide photomontages to illustrate the changes proposed (including tree removal etc).**
- CASA requires 28 turbines to be lit with two steady low intensity 200 Candela lights on wind turbine generators. Based on 200 Candela lighting observed at Sapphire Wind Farm between Glen Innes and Inverell, this is an unacceptable impost to the local community and tourism industry, permanently changing the character of the dark night sky for the lifetime of the project.
- The proponent does not address the visual impact of the proposed 8 m wide (plus cut and fill either side) access track off Crawney Rd (A, B or C), Western Connector Rd, or Transverse Track in photomontages.
- The proponent does not provide a photomontage to communicate visual impact from Crawney Rd of wind farm infrastructure proposed on Governor's Shelf; Operations and Maintenance Building and Carpark, Concrete Batching Plant, BESS, Substation and Transmissions Lines/Towers/Easement.

- The proponent does not address the need to reshape the profile of the mountain to achieve sufficient level areas for turbine foundations, crane pads and assembly areas.
- There are still properties that have not received photomontages or information regarding the proposed visual impact of 64 wind turbines on the range, for example Wombramurra East Eco-House listed in The Sunday Telegraph Top 50 Houses in NSW (Sunday, November 13th, 2022).

## **(vi) CHARACTER**

- Rex J Andrews Engineered Transport proposes a No Parking Exclusion Zone on the left lanes heading east on Oakenville and south on Jenkins Streets during Oversize Overmass deliveries using Nundle Loop option. It is not specified whether this would be required for Jenkins Street south (Nundle Bypass option). This would cause unacceptable interruption to the amenity of local residents, business owners, and tourists considering these streets provide access to private residences and essential services including Nundle Post Office, Nundle Public School, Nundle Swimming Pool, Nundle Health Service, Nundle CWA Pre-School, Tamworth Regional Council Nundle office, Nundle Library, Nundle Court House Museum, private hospitality, accommodation, and retail businesses, and charities.
- The proponent does not address the irreversible alteration of the character of roads at Nundle, Hanging Rock and Crawney, due to vegetation removal and significant pavement modification. This would change the character of the transport route in places from idyllic mountain drive to industrial carriageway. It would also alter the experience of entering heritage Nundle and Hanging Rock villages, tourist attractions including Sheba Dams, Hanging Rock Lookout, and travel surrounding the DAG Sheep Station, Teamsters Rest Recreation Reserve, and Crawney Pass National Park.
- The proponent omits acknowledging significant mature tree vegetation on the median strip and trees lining Jenkins Street as seen below in the Route Study. The trees on the median strip were planted in the 1980s and those planted from Oakenville/Jenkins corner to Nundle cafe were already mature trees four decades ago. The image is of poor quality and although taken in winter, does not adequately represent the heavy tree line along this part of Jenkins street, the trees overhang the road. A comparative study (shown below) shows all trees to be removed and those “unlikely to be removed”. Why was the Jenkins Street image not treated in the same manner?



### 3.5 Km's: Jenkins Street through Oakenville Street at Nundle.

Image 1:



*Jenkins Street has numerous mature trees with large canopies lining the street, including on the median strip, why are they not represented here with a green (or red) outline as depicted below? We can assume if OSOM vehicles travel the Nundle Loop, these trees will be affected. This image is misleading and does not adequately represent the trees lining this part of Jenkins Street at all – they appear even, to be missing.*

### 170 Metre rotor: Option 2, Step 2



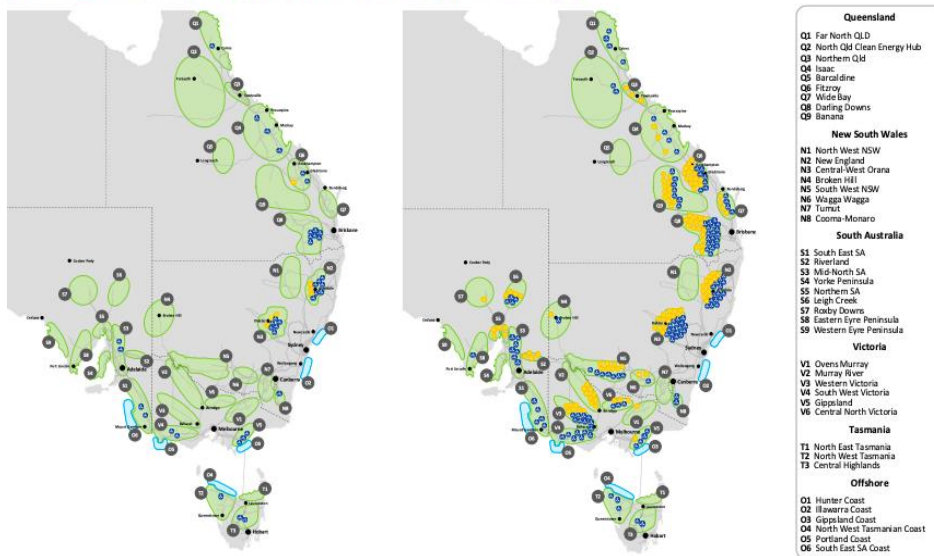
## **(vii) LACK OF SOCIAL LICENCE**

- The proponent still hasn't identified all Non-associated Dwellings within 5km of the project area. HOGPI has identified 74 Non-associated Dwellings while the proponent has identified 56. This would make 67% Non-Associated Dwellings and 32% Associated Dwellings within 5km of the project area.

## **(viii) NOT GOOD VALUE FOR NSW CONSUMERS**

- The proponent has changed the way it expresses the Capital Investment Value of the proposal. In November 2022 minimum Capital Expenditure is expressed as \$332 million (within the domestic economy) with ongoing operational expenses of \$17 million per annum for a project proposing to generate 380-440MW. This compares to the EIS that outlined CIV of \$826.4 million with 33 exclusions. Why has the proponent changed the way the CIV is expressed? Is it because compared to other wind farms proposed in NSW, Hills of Gold Wind Farm does not represent value for NSW consumers. This is an important consideration for Long Term Energy Storage Agreements awarded by the NSW Consumer Trustee (Australian Energy Market Operator).
- What is the Hills of Gold Wind Farm Capital Investment Value (even with 33 exclusions) in November 2022? With construction costs generally increasing 30% since 2021, you would have to assume the CIV is now more than \$1 billion. What is the capital investment per megawatt, and how does it compare to proposed wind farms in NSW or Australia?

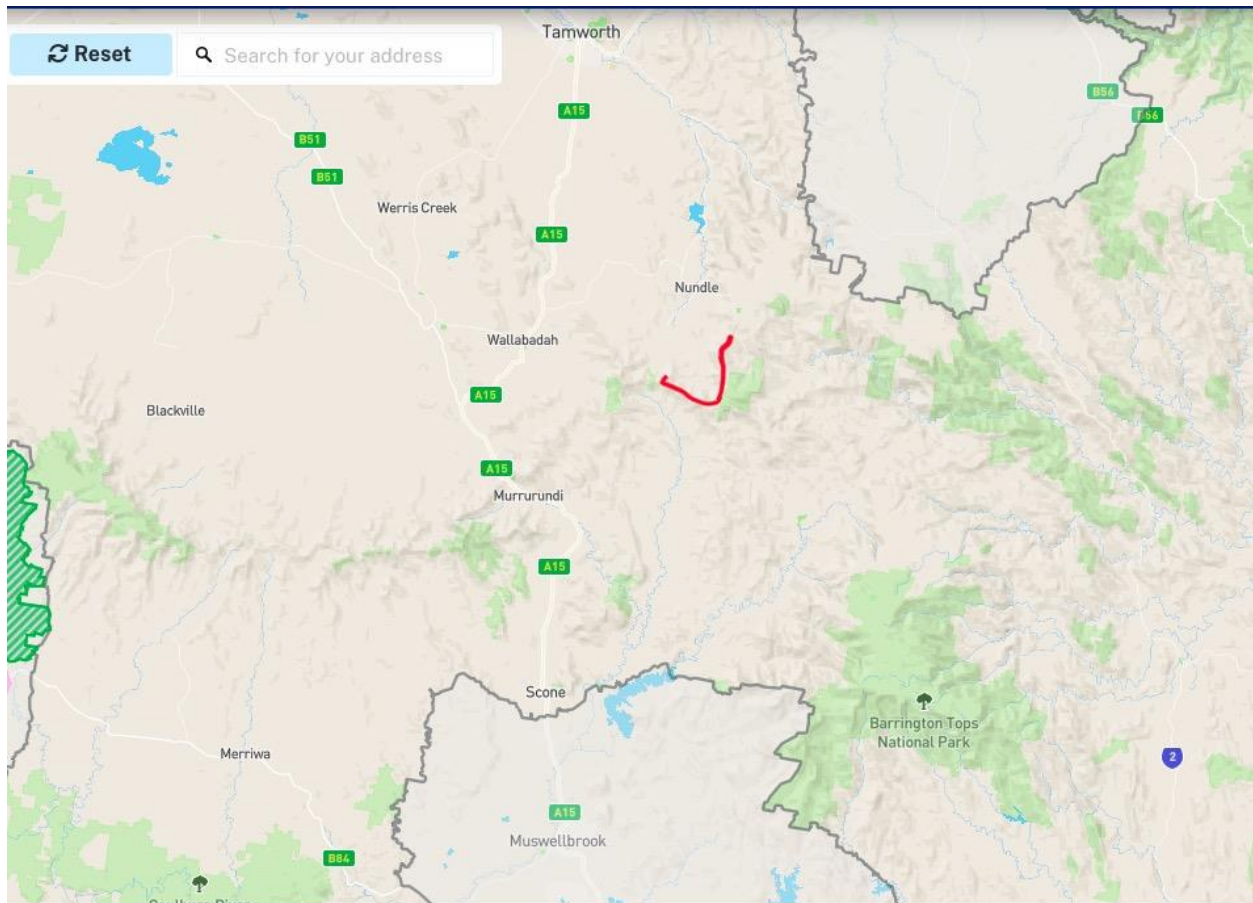
Figure 15 REZ development in the Step Change scenario – 2029-30 (left) and 2049-50 (right)



† AEMO has updated the REZ boundaries for N5 aligned with geographical area of the SWSW REZ in Schedule 1 of the draft REZ declaration, available at <https://www.energy.nsw.gov.au/sites/default/files/2022-03/Draft%20South-West%20REZ%20Declaration.pdf>. AEMO will update all relevant parameters in the 2024 ISP.

‡ EnergyCo is in the early stages of planning for two new REZs in the Hunter-Central Coast and Illawarra regions of New South Wales, as set out under the New South Wales Electricity Infrastructure Act 2020. These REZs are not shown because they are not yet geographically defined.

Source: AEMO 2022 Integrated System Plan



Hills of Gold Wind Farm proposal marked here in red



# ASSESSMENT OF IMPACTS

## 1.0 INTRODUCTION

Hills of Gold Preservation Inc members are frustrated to be reading Engie's Hills of Gold Wind Farm Amended Development Application. Hills of Gold Wind Farm was excluded from the New England Renewable Energy Zone, which has a planned transmission capacity of 8GW and 34GW of Expressions of Interest for renewables generation. Hills of Gold Preservation Inc is a member of Responsible Development for New England (ReD4NE) and has attended forums at Walcha, Uralla, and Armidale, to understand the REZ roll out, even though Hills of Gold Wind Farm is not in a REZ. Hills of Gold Wind Farm is located between the New England REZ, Central-West Orana REZ, and, newly declared, Hunter-Central Coast REZ.

Despite nearly five years of development, the Amended DA remains unacceptable. It is the same proposal with minor adjustments on the range, but with continuing major disruption to habitat, ecosystems, soil, runoff, erosion, sedimentation, and people in surrounding communities. It is as if there are no pre-existing ecosystem or communities, green colonialism with no respect for habitat, homes, or sense of place.

The proposal has no social licence. This is evident from the majority of Non-Associated Dwellings surrounding the Project Area. Yet Engie continues to deny local majority opposition to its proposal, repeating the claim made in its EIS:

*"The strong support given to the Project from the majority of residents who live in the nearby Nundle and Hanging Rock community demonstrates broad community acceptance of the Project." (Pg 43, Amendment Report November 2022 Main Volume).*

This statement is not true and was previously singled out for complaint to the Department of Planning and Environment following exhibition of the EIS in January 2021. This demonstrates poor community consultation and lack of transparency with the community.

As a consequence of Engie's poor community consultation and lack of transparency with the community, it has no credibility with the local community majority. Most recently, an Engie representative stated at the April CCC that access tracks off Crawney Road were not part of the proposal. At the October CCC update the same tracks were presented as part of the Amended

DA. With this past form, how can Hills of Gold Preservation Inc members believe anything they are told or read associated with this proposal? Will we have to wait another 12 months for a Response to Submissions? Will there be more Requests for Information? Will there be further Amendments?

Hills of Gold Preservation Inc members note that the project footprint has increased, now 447 hectares. The number of wind turbines is reduced by one, at 64, however 6-7MW turbines are now provided as options making the wind farm generation 384-448MW. The Capital Investment Value has not been updated since November 2020 when it was \$826.4 million with 33 exclusions. Now the proponent is expressed minimum Capital Expenditure of \$332 million (within the domestic economy) with ongoing operational expenses of \$17 million per annum. We have no idea how much the proposal has increased in Capital Investment Value, cannot determine the project's current cost per megawatt, or compare it against other NSW wind farms.

In addition to 40km of internal roads the proponent now proposes two construction compounds (site office, car park, amenities), two concrete batching plants, seven laydown storage areas, and an expanded Hanging Rock quarry.

The Hills of Gold Wind Farm Amended DA does not contain enough detail, leaving unacceptable uncertainty and risk surrounding the proposal. Hills of Gold Preservation Inc members have no confidence in the proponent to deliver and implement the detail required to protect the local environment and community in the following 14 future plans:

1. Progressive Erosion and Sediment Control Plan
2. Soil and Water Management Plan
3. Waste Management Plan
4. Aboriginal Heritage Management Plan
5. Bushfire Emergency Management and Operations Plan
6. Construction Management Plan
7. Noise Management Plan/Noise and Vibration Assessment
8. Biodiversity Management Plan
9. Biodiversity Offset Strategy
10. Traffic Management Plan
11. Bird and Bat Adaptive Management Plan
12. Weed Management Plan
13. Erosion and Sediment Control Plan
14. Environmental Management Strategy

Of particular concern is the missing information that Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest was upgraded to Critically Endangered by the Commonwealth on 5th October, 2022. Previously, its NSW Conservation status was Endangered Ecological Community, and it was not listed by the Commonwealth. Why can concerned community volunteers research this information and paid experts cannot? Similarly, the proponent demonstrates poor corporate responsibility by assessing the Koala as Vulnerable, not Endangered, under controlling provisions of the Environment Protection and Biodiversity Conservation Act 1999 because it was listed as Vulnerable when the proposal became a controlled action. We assume the proponent will adopt the same approach to the now Critically Endangered Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest, which avoids transparent accountability for these protected species. Is the environmental impact not on the books? Is a French multinational company not paying the bill for impacts to nationally protected Australian flora and fauna?

Also missing is the engineering of the proposed Western Connector Road, Transverse Track, and proposed construction of an Operations and Maintenance Building, Concrete Batching Plant, Substation, and BESS on an area called Governor's Shelf. This significant alteration to the landscape warrants drawings showing the gradient of the land it is being built on. Given the 20-60% steep gradient of the country (worse than previously proposed Devil's Elbow Private Road), we would expect to see the same preliminary geophysical surveys in order to understand the environmental and safety issues involved in construction. If you do not know how you are going to build, how can you measure the environmental impact?

The considerable number of options presented in the Amended DA is alarming. All options rely on the proponent transporting OSOM components via Crawney Rd, either via a Private Road behind The Peel Inn, or a Nundle Loop via Oakenville St, Old Hanging Rock Road, Happy Valley Road, River Road and Jenkins Street. Neither route has relevant permissions in place. The proponent does not have a viable transport route.

The proponent has not removed nine wind turbines recommended by Sonus for removal due to non-compliance with Noise Guidelines. The Response to Submissions Report stated that the Hills of Gold Wind Farm is not viable without these nine wind turbines.

The proponent has not addressed the NSW National Parks and Wildlife Service request to remove all turbines bordering Ben Halls Gap Nature Reserve.

The proponent is persisting with a proposal for a wind farm that is unviable due to non-compliance with Noise Guidelines, and does not have a viable transport route. Why is the proponent wasting community and local and state government time any further?



## 2.0 BIODIVERSITY

### **Upgrade of Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest to Critically Endangered**

The proponent does not identify that Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest Legal Status has been listed as Critically Endangered under the Environment Protection and Biodiversity Conservation Act 1999, effective 5th October 2022. The Updated BDAR (26 October 2022) does not acknowledge or reflect this listing.

<https://www.environment.gov.au/cgi-bin/sprat/public/publicshowcommunity.pl?id=176&status=Critically+Endangered>  
<https://www.environment.gov.au/biodiversity/threatened/communities/pubs/176-conservation-advice.pdf>

**(Appendix 3.0 & Appendix 3.1 attached)**

The Department of Climate Change, Energy, the Environment and Water Species Profile and Threats Database outlines that, "...The ecological community has a small distribution, primarily in one National Park in one bioregion within a single jurisdiction..." comprising patches in Ben Halls Gap Nature Reserve (where most of the ecological community occurs) and Ben Halls Gap State Forest. This warrants the removal of the turbines adjacent to Ben Halls State Forest as well.

The Approved Conservation Advice states that "...the action of a threatening process could cause it to be lost in the immediate future...particularly severe fires..." Other threats include weed invasion, sediment due to soil disturbance during track and road construction, groundwater drawdown, and increased visitation by humans. The ecological community is often associated with small bogs where springs emerge on basalt benches on plateau mid-slopes.

"As this ecological community is highly restricted in extent and it is not possible or unknown how to reconstruct it, it is not appropriate to propose offsets for actions that may cause damage."

The Priority conservation and research actions specify avoiding off-site impacts such as changes to hydrology, ecological process and landscape function. It suggests preventing loss of nearby native vegetation, and preventing sediment entering streams due to soil disturbance from track

and road construction. It recommends avoiding development that will limit future ecological management of fire. It proposes controlling runoff during nearby construction to prevent movement of weeds or pathogens and alteration of the spring fed systems supporting the community.

The Biodiversity, Conservation and Science Directorate has identified there is a “...lack of ability to apply large buffers to turbines due to landform constraints...” Surely the listing of Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest to Critically Endangered elevates the need to prevent any soil disturbance from wind farm infrastructure construction next to Ben Halls Gap Nature Reserve and Ben Halls Gap State Forest, and to prevent any loss of capacity for aerial firefighting proven to be essential for fire control in the Nature Reserve in January 2019.

The Updated BDAR (Pg 548) states that “...there is the potential for weeds and pathogens to be introduced and spread during construction as a result of machinery movements and increased foot traffic...”

The 2021 State of the Environment report lists habitat loss and clearing as significant threats facing Australia’s biodiversity.

An official review of the Environment Protection and Biodiversity Conservation (EPBC) Act says Australia’s main environmental law is failing both the environment and developers and contributing to the unsustainable decline of Australia’s habitats.

As the NPWS states in its reply to the updated BDAR and Bushfire Risk Assessment and Proponent’s Response to Submissions (January 2022), 28 turbines are described as posing “Moderate Risk” to local threatened bird and bat species. “...A key question is whether a moderate level of risk to threatened species is acceptable adjacent to high quality habitat on national park?” For this reason and potential impacts on NPWS operations, NPWS recommended removal from the proposal of all turbines adjacent to Ben Halls Gap Nature Reserve. This has not been done.

The conservation of Critically Endangered Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest is not compatible with a proposal for an industrial neighbour.

Hills of Gold Preservation Inc members remain unsatisfied that the proponent will protect the public environmental assets in Ben Halls Gap National Park. The proponent repeats the statement from the EIS, “...an appropriate buffer will be maintained where appropriate...” This

statement prioritises the private profit of French-owned Engie, over the protection of Australian flora, fauna and biodiversity in Ben Halls Gap Nature Reserve.

National Parks and Wildlife Service previously asked the proponent to remove wind turbines neighbouring Ben Halls Gap Nature Reserve to remove the potential barrier effect of the wind turbines for home roosting birds and bats, and enable aerial bushfire fighting in Ben Halls Gap Nature Reserve. By removing Wind Turbine #41 and minor shuffling of 19 turbines under 100-150m there is now a 1.2km gap bordering Ben Halls Gap National Park. The proponent then suggests that it should have permission to move turbines 100 m radius, consequently making moving 19 turbines meaningless. This would enable the proponent to move turbines closer to BHNR. This also doesn't remove the barrier effect of the remaining turbines bordering Ben Halls Gap Nature Reserve, potentially contributing to bird and bat strike. The turbines also remain an obstacle to aerial fire fighting despite the gap. Fires, birds and bats may not get the memo to cooperate with the gap.

Location of the turbines from the boundary of Ben Halls Gap Nature Reserve:

WTG 32	201 metres (moved closer)
WTG 33	217 metres
WTG 38	170
WTG 39	144
WTG 40	103
WTG 42	98
WTG 43	77 (overhangs canopy of BHGMR)
WTG 44	173
WTG 45	133



## Endangered Koala

The Updated BDAR (Pg 351) states that the proposal would clear 46.28 of koala habitat, critical to the survival of the species and likely to result in a significant impact. Within 10km of the development footprint the koala has been identified seven times, with an additional three individuals recorded within the development footprint during the current field assessment. **It is disturbing and unacceptable that the Koala remains considered as Vulnerable not Endangered under the Commonwealth EPBC Act as part of the controlling provisions (Updated BDAR Pg 582) because it was listed as Vulnerable when the proposal became a controlled action.** Given the Endangered status of koalas it is inappropriate for the Updated BDAR (Pg 583) to state, “It is unlikely that Koalas inhabiting the development footprint would be considered part of an ‘important population’ of Koalas.” Surely any population of Koalas is considered important.

North West Ecological Services/Phil Spark is currently conducting a study, including Hanging Rock, Crawney, Timor and Wallabadah slopes regions, to identify Koala populations. This is part of a conservation program with Local Land Services and Sydney University Koala research team to find and protect healthy populations that remain on the slopes. It is in reaction to the decline of koala populations at Gunnedah and the Liverpool Plains, making the slopes populations very important to conserve and protect.

The project would remove 45.62ha of Spotted Tailed Quoll habitat, again likely to cause significant impact, adversely impacting populations within the local area (Updated BDAR Pg 440).

There are planned direct impacts to habitat for Barking Owl, Booroolong Frog, Border Thick-tailed Gecko, Eastern Cave Bat, Eastern Pygmy-possum, Greater Glider Large-eared Pied Bat, Powerful Owl, Sooty Owl, Southern Myotis, Squirrel Glider and Masked Owl.

There is planned direct loss of 35 ha of Threatened Ecological Communities: Ribbon Gum-Mountain Gum-Snow Gum Grassy Forest Woodland of the New England Tableland Bioregion, and White Box Yellow Box Blakely’s Red Gum Woodland and derived native grassland.

The proponent relies entirely on Biodiversity Offsets and Biodiversity Stewardship to achieve its ‘No net biodiversity loss’ claim. The Integrity of the NSW Biodiversity Offsets Scheme Parliamentary Inquiry found that there are multiple problems with the scheme, and questions its capacity to achieve a goal of ‘no net loss’ of biodiversity. The inquiry found the scheme

facilitates development rather than protecting irreplaceable biodiversity values. It heard that, “New South Wales's biodiversity is under threat. We cannot afford to hasten the extinction of what biodiversity remains through a scheme that trades off threatened species for cash.

Recommendation 11 states, *“That the Department of Planning and the Environment and Local Land Services, in consultation with landholders, develop and implement a plan to prevent land clearing on rural land regulated by the Local Land Services Act 2013 that would have otherwise triggered or increased obligations under the Biodiversity Offsets Scheme.”*

HOGPI members remain concerned that North West Local Land Services approved land clearing on Wombramurra Mountain for agricultural purposes in September 2020, and Engie’s EIS was lodged in November 2020 proposing the following wind farm infrastructure:

- Wind Turbine Generator 21 and 22;
- Transmission Line and 60m wide easement
- All weather hardstand of crushed rock adjacent to each Wind Turbine Generator of 0.38-0.53ha
- Internal Access Track 5.5m wide
- Electrical Cable and Fibre Optic Network connection to substation

Is this area included in the biodiversity credit estimates in the Amended Development Application? Similarly, part of the wind farm infrastructure is proposed on land where there has been unauthorised clearing, which resulted in a Set Aside Conservation Agreement. **Would these areas of clearing have otherwise triggered or increased obligations under the Biodiversity Offsets Scheme?**



Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest © Doug Beckers



### 3.0 SOIL & WATER

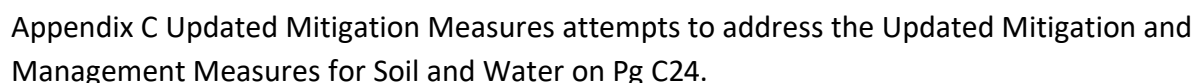


*Crawney Road Access Option A. Upgraded farm track crossing Wombramurra Creek that would require a substantial bridge constructed to carry OSOM loads and withstand frequent flash flooding.*

The proponent clearly likes a challenge and this project is made out of stuff that keeps engineers awake at night. The rain catching mountain with high precipitation, steep slopes with unstable soil, and history of ongoing erosion and landslides. Ask old timers who have mustered livestock on this mountain range and they will tell you about whole sides of paddocks a few acres in size moving downhill with trees still standing on them, or new gullies formed after one good downpour and the creeks below running blood red carrying basalt soil.



<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachmentRef=SSD-9679%2120221109T223105.979%20GMT>



The report identifies that turbine and infrastructure locations would be further refined to avoid adjacent steeper slopes and rocky outcrops. HOGPI members would like to see this level of detail applied prior to approval because if steep slopes and rocky outcrops are a constraint it questions the overall suitability of the proposed site.

The report states that there would be a need for up to 10 m high batters where slopes 2H:1V or shallower and a minimum bench width of 4.5 m. HOGPI members ask where will the 10 m high batters be used and what will the maximum bench width be?



The report acknowledges that, “Given the relatively steep and exposed nature of much of the Development Footprint, and assessed high dispersity/erodibility of site soils, detailed design will assess the need for the use of appropriate cut/fill batter protection and effective site surface water management and drainage techniques to prevent the mobilisation of sediments to natural water courses.” HOGPI members are concerned that the constraints of the steep, high erodibility of site soils is not addressed in more detail prior to approval. The constructibility and environmental impact is not clear for individual turbine locations, and infrastructure including the Transverse Track, Western Connector Road and a proposal for five elements at the western end of the proposed project area (Operations and Maintenance building, Substation, BESS, Concrete Batching Plant, and Construction Compound. To assess the constructibility of Hills of Gold Wind Farm access and infrastructure components it would be useful to see proposed wind farm infrastructure plotted on the Wind Farm Site Slope Analysis (Response to Submissions, Appendix N, Soils and Water Addendum Report F3-1&2). In the absence of this, proposed wind farm infrastructure plotted on an old fashioned topographic map is concerning enough.

Similarly, the potential environmental risk of construction of wind farm infrastructure cannot be measured because the amount of soil disturbance is not understood.

The proponent suggests vegetation or shotcreting batter faces would be used to “prevent the mobilisation of sediments to natural water courses.” The report describes how “Drainage design will aim to direct runoff from all hardstands, access tracks and Project infrastructure to appropriate sediment control facilities such as sediment basins, grassed filter strips or swales to trap sediments and filtered off before being discharged.” Without an understanding of the volume of rain and supercharging snow melt, and velocity of runoff experienced on steep slopes across the range, the proponent cannot understand that such mitigation may be meaningless in the face of frequent damaging precipitation. In his Review of Hills of Gold Appendix N Soil and Water Addendum Report with Comments on Submission Report Dr Rob Banks writes, “...the revised Soil and Water study does not demonstrate that the proposed disturbance

footprint includes an appropriate allowance for constructibility, implementation of erosion and sediment controls, and is informed by geotechnical data collected on site or from published soil landscapes which include the footprint of the development.” **(Dr Banks’ report is attached here as Appendix 2.0)**

Pg C23 of the report states, “To minimise the ongoing maintenance any cut and fill slopes, batters will be vegetated with grass as soon as possible following construction.” In Hills of Gold Preservation Inc’s ‘Review of Hills of Gold Wind Farm Response to Submissions’ HOGPI deputy

president and retired Hanging Rock farmer with 40 years experience of the climate and soil, Brian Tomalin, explains, “The reliance on grass cover to reduce erosion, prevent mass movement and encourage absorption in an area that for centuries has been heavy timber cover is unrealistic.”

Serious question remain for the proponent:

- What is proposed to prevent mass movement?
- What will be done to compensate for the stabilising effect of the vegetation that has been removed?
- How will the site be dewatered to enable excavation for hard stands, turbine foundations and road construction?

Hills of Gold Preservation Inc members request that DPE ask for a schematic diagram of the shape/profile of the mountain showing the excavation required for hard stands, turbine foundations and road construction. It should show engineering projections of the depth of excavation, and compaction requirements to enable the construction of stable tower foundations.

Despite the recognised constraints of the proposed site the proponent is still delaying further geotechnical study, including soil characteristics, and preparing a Soil and Water Management Plan until prior to construction. This does not acknowledge that the steepness of the slopes and erodibility of site soils could be unsuitable for the scale of industrial infrastructure necessary for access and wind farm operation. It should be independently researched prior to DPE Recommendation and IPC Determination because the proponent has demonstrated it will not contemplate unacceptable environmental impacts of access and operation construction.

This is a particularly important consideration following the EPBC Act Critically Endangered listing of Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest in neighbouring Ben Halls Gap Nature Reserve and Ben Halls Gap State Forest. The Amended DA does not acknowledge the Critically Endangered EPBC Act listing of Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest. The proponent specifies that the Threatened Ecological Community is located “more than 135 metres outside the closest extent of the development footprint.” The Critically Endangered EPBC listing brings into question the appropriateness of an industrial proposal of this scale so close to this sensitive community. The Conservation Advice describes how for actions that may have ‘significant impacts’ and require approval under the EPBC Act, it is important to consider the whole environment surrounding patches of the ecological community. Disturbance to water quality and quantity is identified as an ongoing major threat, with specific reference to sediment entering streams due to soil disturbance, increased human

visitation impacting water quality in the area, changes in water availability, and groundwater drawdown. The risk of weed invasion and spread of plant pathogens, and fire regimes that cause declines in biodiversity are also highlighted.

The conservation advice identifies priority conservation actions for the abatement of threats and supporting recovery of the ecological community including conditions of approval for relevant controlled actions under national environment law (the EPBC Act). It states, “When considering potential negative impacts on the ecological community from development or other actions in or nearby the ecological community, avoidance is the appropriate approach.” Given the significance of the EPBC Act Critically Endangered listing of Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest, DPE must recommend rejection of Hills of Gold Wind Farm.



Sphagnum cristatum hummock pictured in the rare Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest in NSW. (Doug Beckers / DCCEEW)

The proponent states that it would “...obtain all necessary water access licences...” However it is yet to identify its source of 55ML of water during construction. DPE Water and NRAR previously noted that there is no assessment of accessing an existing or new bore to confirm water supply availability, and securing entitlement from the unregulated Chaffey Water Source will be “challenging” with less than 400ML of issued entitlement.

The proponent continues to demonstrate a lack of appreciation or understanding of how the hydrological function of the mountain is particularly important for the Peel River and inflows

into Chaffey Dam which is the main water supply for Tamworth City and provides downstream environmental, irrigation and industrial water. Water security is vital to achieving the 100,000 population goal of Tamworth Regional Council. 'Deliver durable water infrastructure including raw water' is a priority theme of Council's planning document Blueprint 100. Water security starts with conservation of vegetation in the upper catchment to slow the flow of runoff. Brian Tomalin explains:

*"The high rainfall along the Tops filters down through the strata over time and maintains springs downslope which support flows in the upper reaches of Peel River, Barnard River, Pages Creek and Isis River. The "big sponge effect" maintains good flows well into drought periods. The influence of regular winter snow above 900m on the groundwater and soil moisture levels has not been addressed. The functioning of the springs along the top of the ridge maintains water and moisture in the First Order streams which stem from them and supports the ability of second, third and fourth order streams to maintain a healthy flow.*

*The removal of increasing amounts of timber cover along the top of the ridge, the compaction and concrete required for tower foundations and infrastructure, compaction for hardstands and roads will increase the speed and volume of runoff and inhibit the ability of the "Big Sponge" to absorb the high volume of rainfall experienced in the Project Footprint."*

The Updated BDAR does not acknowledge that Nundle Creek Bridge and Pearly Gates Bridge have not been assessed for load carrying capacity. Two Oakenville Creek bridges are not even identified on Nundle Loop plans. Subsequently, it is not identified whether these four bridges would need to be replaced and the environmental impact to waterways.

Appendix C Updated Mitigation Measures does not adequately address the risk of flooding within the Upper Peel Valley Catchment.





*Pearly Gates Bridge, Crawney Rd, Nundle. Peel River flash flooding on November 1st, 2022 that resulted in Nundle Road (Dungowan and Piallamore) and Oakenville Street, Nundle being closed. Mail delivery and the high school bus were cancelled for three days.*

## 4.0 TRAFFIC & TRANSPORT

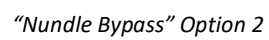
The Traffic and Transport impacts of the proposed wind farm have been difficult for the community to understand.

HOGPI volunteers compiled their own merged and enlarged images to display at a pop-up office open daily for three weeks from 10am-4pm. HOGPI hosted a public meeting during the Public Exhibition period after Engie refused to do so. It attracted 75 people during the second last week of the school year. This helped community members understand the Oversize Overmass route (Nundle Bypass), and two proposed Blade Transport Routes (Nundle Bypass and Nundle Loop).



*Photograph of Jenkins Street looking towards Innes Street intersection, the proposed "Nundle Bypass" would exit through Innes street onto Jenkins street.*







*Following the purchase of 71 Jenkins Street by the Hills of Gold Wind Farm major turbine host we can assume that Option 2 is the preferred option for the Nundle Bypass. 'Building may need to be removed.*



## HILLS OF GOLD PRESERVATION INC

### OBJECTION TO THE AMENDED DEVELOPMENT APPLICATION FOR HILLS OF GOLD WIND FARM PROJECT SSD-9679



**PROCEDURE:** Left hand turn from Happy Valley Road onto Jenkins Road.  
**GPS LINK FOR SECTION OF ROAD:** <https://goo.gl/maps/9f75wcm6DrQk2Vj8>  
**COMMENTS:** Roads will have reversed along Happy Valley Road from Old Hanging Rock Road and reverse into the landowner's boundaries at the T intersection. Once both are past the intersection they will turn right and continue south onto Jenkins Street.  
**ROAD MODIFICATIONS:** Large amounts of work are required.

4b

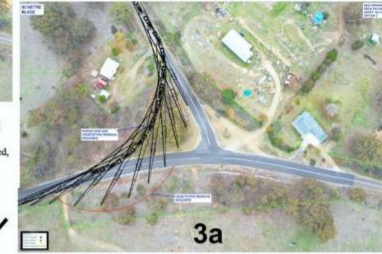


**PROCEDURE:** Left hand turn from Old Hanging Rock Road onto Happy Valley Road.  
**GPS LINK FOR SECTION OF ROAD:** <https://goo.gl/maps/cfrnJ389QXChg2AE8>  
**COMMENTS:** Blades are to travel past the intersection then reverse into Happy Valley Road. The gradient cannot exceed 3% to be able to reverse back. Hardstand will be required, and some vegetation will need to be removed.  
**ROAD MODIFICATIONS:** Large amounts of work are required.

3b

**Either turning or reversing into Happy Valley road**

*Nundle "Loop Road"*



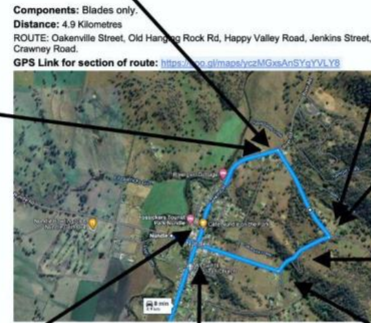
**PROCEDURE:** Left hand turn from Old Hanging Rock Road onto Happy Valley Road.  
**GPS LINK FOR SECTION OF ROAD:** <https://goo.gl/maps/cfrnJ389QXChg2AE8>  
**COMMENTS:** Blades to turn left from the incorrect side to the incorrect side of the road. The swept path will have the blades travel through a landowner's boundaries. This will require hardstand to be added to the inside of the intersection. Additionally, vegetation will need to be removed.  
**ROAD MODIFICATIONS:** Large amounts of work are required.

3a

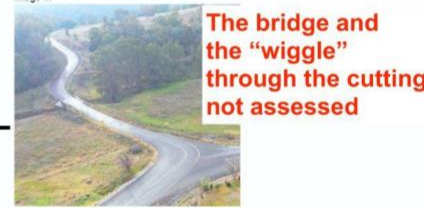


**PROCEDURE:** Left hand turn from Happy Valley Road onto Jenkins Road.  
**GPS LINK FOR SECTION OF ROAD:** <https://goo.gl/maps/9f75wcm6DrQk2Vj8>  
**COMMENTS:** Blades to turn left from the incorrect side to the incorrect side of the road. The swept path will have the blades travel through a landowner's boundaries. This will require a fence to be relocated, hardstand added and a power pole to be relocated. Additionally, a sign will need to be made removable.  
**ROAD MODIFICATIONS:** Large amounts of work are required.

4a



**Components:** Blades only.  
**Distance:** 4.9 Kilometres  
**ROUTE:** Oakenville Street, Old Hanging Rock Rd, Happy Valley Road, Jenkins Street, Crawney Road.  
**GPS Link for section of route:** <https://goo.gl/maps/9f75wcm6DrQk2Vj8>



**The bridge and the "wigggle" through the cutting not assessed**



**PROCEDURE:** Travel directly ahead on Jenkins Street.  
**GPS LINK FOR SECTION OF ROAD:** <https://goo.gl/maps/9f75wcm6DrQk2Vj8>  
**COMMENTS:** Blades to travel directly ahead on the correct side of the road. A no parking exclusion zone will need to be placed on the left-hand side prior to and after Jenkins Street while travelling through this intersection.  
**ROAD MODIFICATIONS:** Small amounts of work are required.

5



**PROCEDURE:** Travel directly ahead on Oakenville Street.  
**GPS LINK FOR SECTION OF ROAD:** <https://goo.gl/maps/9f75wcm6DrQk2Vj8>  
**COMMENTS:** Blades to travel directly ahead on the correct side of the road. A no parking exclusion zone will need to be placed on the left-hand side while travelling through this intersection. Two signs will also need to be made removable.  
**ROAD MODIFICATIONS:** Small amounts of work are required.

1



**PROCEDURE:** Left hand turn from Oakenville Street onto Old Hanging Rock Road.  
**GPS LINK FOR SECTION OF ROAD:** <https://goo.gl/maps/9f75wcm6DrQk2Vj8>  
**COMMENTS:** Blades to turn left from the incorrect side to the incorrect side of the road. The swept path will have the blades travel through a landowner's boundaries. This will require a fence to be relocated and hardstand added. Additionally, while travelling over the bridge some signs will need to be relocated and some sections of guardrail relocated.  
**ROAD MODIFICATIONS:** Large amounts of work are required.

2

**Bridge near service station not assessed**



Volunteers also explained the three proposed Access points A, B, and C for OSOM vehicles on Crawney Road, the return of OSOM vehicles via Morrison's Gap and Barry Roads, and Oakenville Street, additional 311 daily vehicle movements, and additional truck movements from the expanded quarry in the State Forest.

The proponent does not acknowledge the significant disruption to the liveability, commerce and essential services in Nundle, Hanging Rock, Crawney and Timor as a result of the proposal.

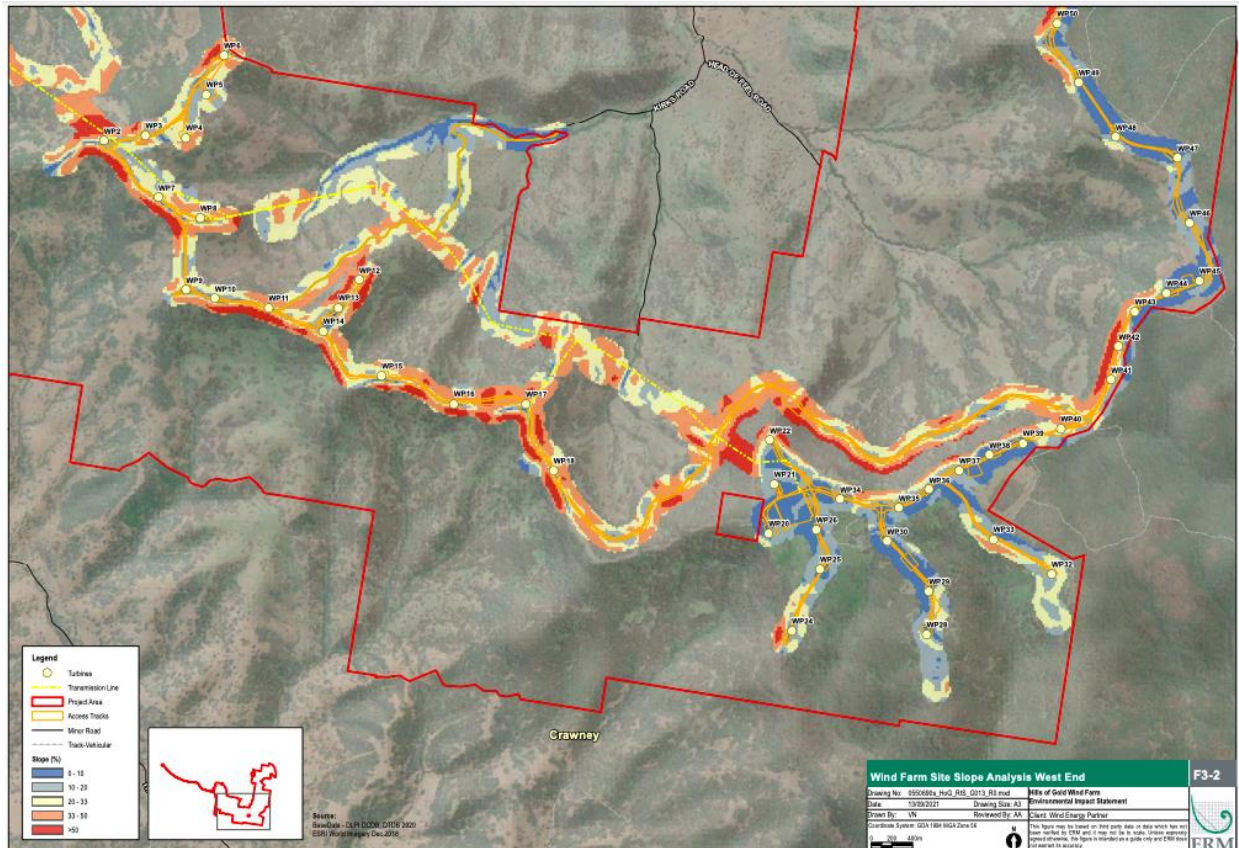


*Photograph of Barry Rd, December 2021. By Zuzanna Savage.*

The proponent does not address that the existing road pavement on the proposed transport route from the New England Highway to the project area is not fit for purpose. Existing 72 daily forestry logging truck movements and La Nina rain for three years has left the road pot holed, whole sections of pavement missing, and Barry Road closed because of a sink hole (above). There is no acknowledgement of the cumulative impact of logging traffic and proposed wind farm traffic. The proponent does not address whether two major bridges, Pearly Gates and

Nundle Creek, will need to be replaced. The proponent ignores two Oakenville Creek Bridges on Old Hanging Rock Road and Jenkins Street.

The proponent is not transparent about the lack of agreement with Nungaroo Local Aboriginal Lands Council that has a land claim on Crown Land between Crawney Road and the Project Area. The proponent does not consider the environmental value of the Crown Reserve and C2 Land Zoning (Environmental Conservation) Tamworth Local Environment Plan 2010.



*Hills of Gold Wind Farm western end Site Slope Analysis from Response to Submissions Appendix N Soil and Water Addendum Report Pg 16 shows gradients of up to more than 50% in the vicinity of the proposed Transverse Track. Western Connector Road is not shown on this map, however gradients of 20-30%, are estimated by local landholders familiar with the topography.*

There is no engineering detail provided to demonstrate what is involved in constructing the proposed Western Connector Road or Transverse Track (similar gradients to the Devil's Elbow Private Road, previously rejected by Tamworth Regional Council). The only indication of the gradient of the proposed roads is a Slope Map in the Response to Submissions and topographic maps. DPE independent consultants must physically inspect these proposed roads as part of the constructability assessment process.



The proponent suggests Devil's Elbow widening and safety improvements (3.2.6 Site Access from Nundle), but provides no detail of the widening or safety improvements.

Morrison's Gap Rd and Crawney Rd residents are asked to endure dust associated with construction traffic for two years. Only then does the proponent agree to seal the roads, after the inconvenience and loss of amenity of two years of dust from wind farm construction traffic.

The proponent states that it will create a car park within walking distance of Nundle to shuttle workers to the project area. Yet the proponent has not identified where the car park would be located or what it will look like. The only vacant land available for a potential car park is located on a flood plain at the entrance to Nundle.

It is not desirable for a wind farm employee car park to be established on available land at the entrance to Nundle, decreasing the experience for residents and visitors of arriving in a heritage country town. The prospect of a construction car park and raised private road raises the following questions:

Will they be fenced?

Will they be gated?

At how many points?

What will be the traffic impacts of entering and exiting or nearest intersections?

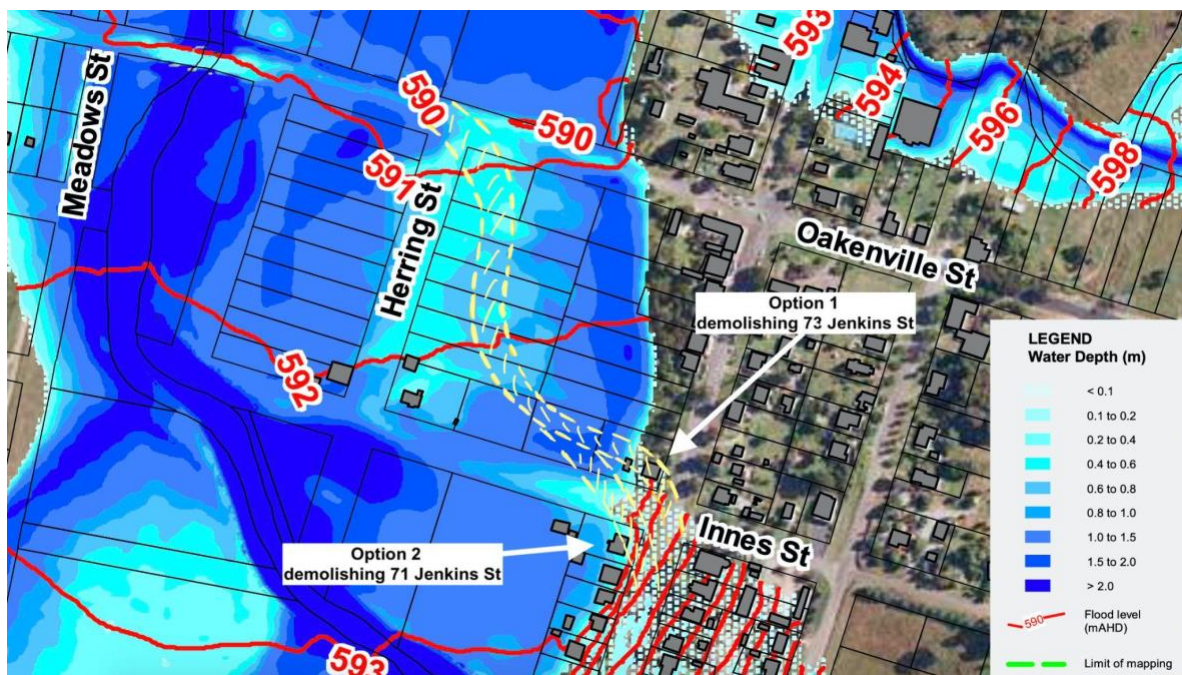


Diagram showing the Peel River flood plain at Nundle village, that would impact the proposed raised private road linking Oakenville and Jenkins Street.



Besides the visual blight, the impact on heritage, urban tree removal, the issue of the waste water dispersal/absorption and the traffic delays due to construction, the proposed raised private road would affect the flow of the flood waters due to this road needing to be built up. This will concentrate flood waters and affect the behaviour and force of flood waters on immediate neighbouring properties and further downstream. Where the water is deepest, just below 73 Jenkins St, the road would need to be built up significantly. This would prevent the water flowing down the familiar path towards and below the pub. This would result in water backing up and the two houses on Herring St would be additionally impacted, as well as the houses along Jenkins street and properties on the western side of the river. It would also result in additional pressure on the bridge and public amenities on the oval.



*Photograph of tree-lined Jenkins Street (looking towards Oakenville Street intersection)*

There is outrage among the local majority opposing the wind farm concerning the proposed removal of street trees in Nundle and on roadsides at Hanging Rock and Crawney. Tree removal has been identified on Oakenville Street, The Peel Inn paddock, Innes Street and Jenkins Street. The fate of street trees on the median strip, and the left lane heading south on Jenkins Street is not identified. This comes at a time when Tamworth Regional Council is working to beautify town entrances in the LGA.

The private road on Peel Inn land is described as a temporary road, but as we know from operating wind farms OSOM access must be maintained for the life of the project to enable component replacements. How does the proponent intend to transport replacement blades

during the life of the project? We don't know what the life of the project would be; 25 years, 35 years, who knows? It depends on the evolution of technology. Let's be transparent and say it is indefinite.



*Photograph of entrance to Nundle village (Nundle Road) close to proposed "Nundle Bypass"*

The proposal for laybys outside people's properties and businesses (one on Lindsay's Gap Rd, three on Barry Rd, one on Morrison's Gap Rd and three on Crawney Rd) is distressing for neighbouring residents. It is a source of annoyance to see trucks parked near your property when that previously did not occur. There is noise associated with trucks stopping, starting, idling and visual intrusion of lights in bad weather and dark winter light. It reduces the residents' amenity. There are also security concerns.

The Crawney Rd route is proposed to cross Tamworth Regional Council Local Environment Plan C2 zoned land. The LEP outlines the C2 zoned land objectives as:

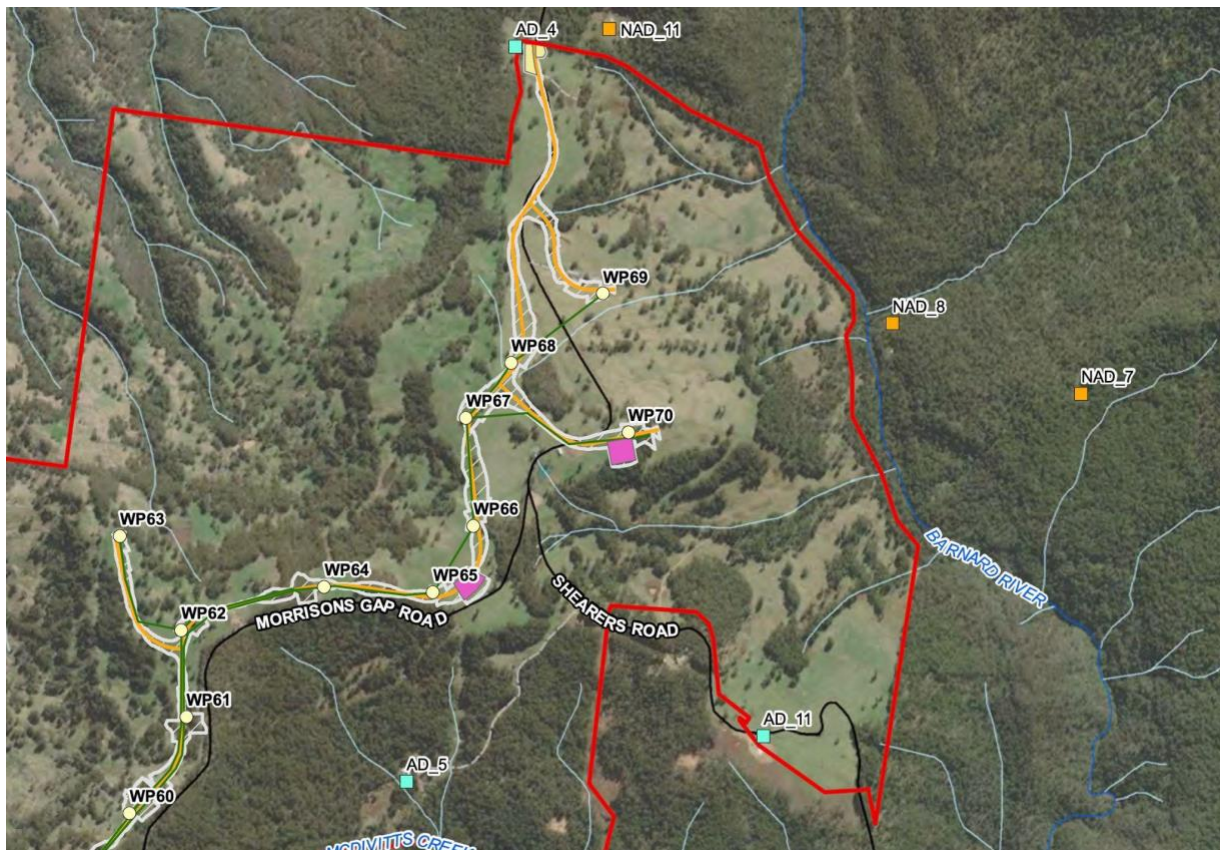
- To protect, manage and restore areas of high ecological, scientific, cultural or aesthetic values;
- To prevent development that could destroy, damage or otherwise have an adverse effect on those values.



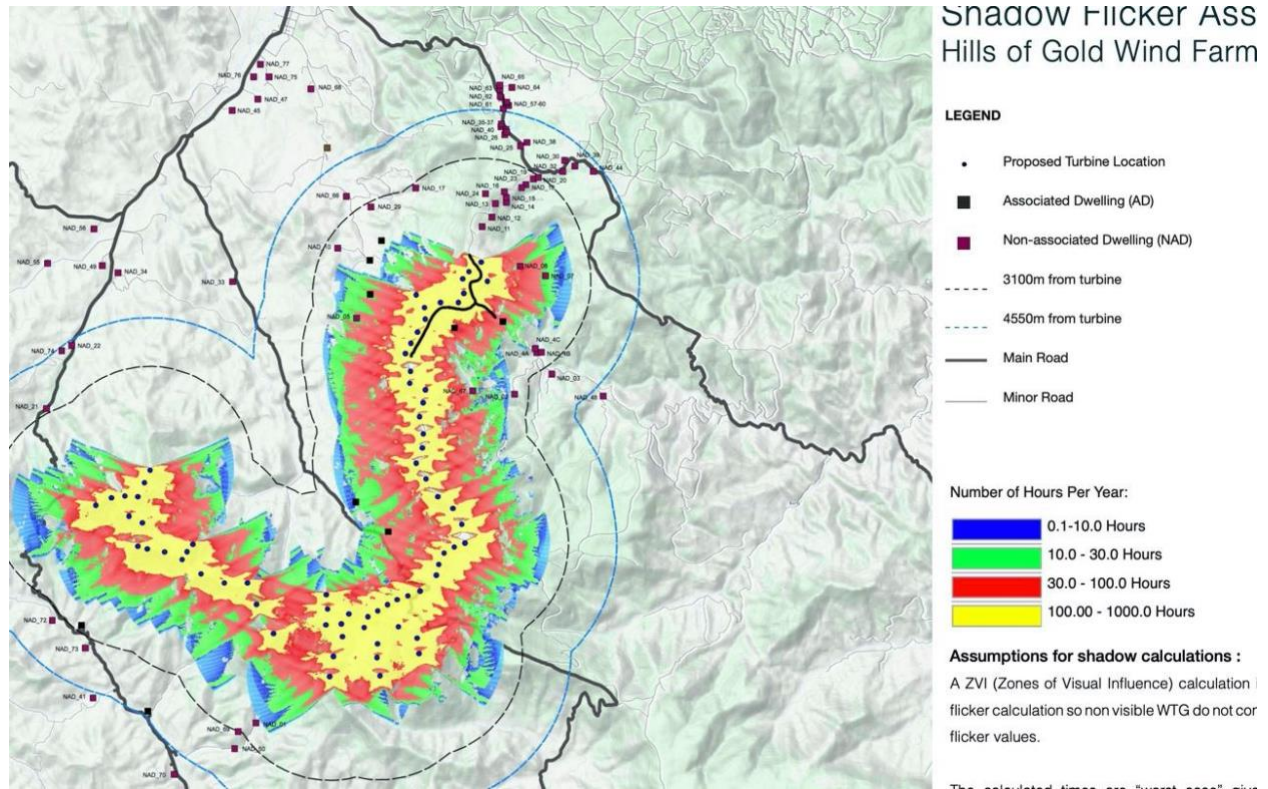
The construction of 8m wide roads (and associated batters) able to carry Oversize Overmass vehicles, the removal of vegetation to enable access for the height and width of the vehicles, and construction or replacement of a bridge over Wombramurra Creek does not comply with the C2 zoned land objectives.

After nearly five years the proponent continues to underestimate the school bus route duration. As previously corrected, the school buses operate 6.30-9am and 3-5.30pm Monday to Friday, an additional two hours daily to that specified in the Amended DA.

The proponent outlines that there will be restricted public access to construction and operational areas, but does not address that a private road from Oakenville Rd and crossing Innes Street and Riverside Walk to Jenkins Street invades public space. Morrison's Gap Rd, a public road, travels through six wind turbines and access tracks crossing the public road. How are residents of Shearer's Road and Morrison's Gap Road, and visitors to Arc-en-ciel Trout Farm meant to continue to use the public road? Surely this raises public safety issues.



A section of Morrison's Gap Road, a public road, is shown winding through six proposed wind turbines and associated tracks. The Amended DA does not address public safety risks including shadow flicker, blade and ice throw.





## 5.0 CONSULTATION AND ENGAGEMENT



*Residents met with Member for Upper Hunter David Layzell and Upper Hunter Shire Councillor Tayah Clout at Timor in June 2022 to express their opposition and concern about soil, erosion, water, poor community consultation, bird and bat strike, potential silting of caves and reduced visual amenity.*

The quality of Wind Energy Partners Pty Ltd's and Engie's consultation and engagement has been poor. Potential benefits of the proposed wind farm have been overstated, and impacts understated.

Turbines were initially proposed on landholders' properties without permission, consequently overstating the proposed Community Enhancement Fund. Turbines are still likely to be removed due to noise and biodiversity impacts. The winners and losers from the proposal continue to shift. Some people who thought they would host wind turbines or infrastructure, now aren't. There is one consistent winner, the major host landholder.

Engie representatives refuse to acknowledge the local majority opposition to its Hills of Gold Wind Farm proposal.

In February, 2022 The Northern Daily Leader reported on Engie chief executive for renewables, Thierry Kalfon visiting Nundle and commenting, **"...we cannot now, in the current environment, develop any renewable project without the strong support of the community."**

Yet Mr Kalfon did not attend a CCC meeting the same day, or meet with HOGPI members during his visit to Nundle.

Despite Tamworth Regional Council twice voting to object to the proposed wind farm, citing it is in an inappropriate location and not in the public interest, and local majority opposition demonstrated during the EIS public exhibition period, online and offline petitions, and Member for Tamworth Kevin Anderson's survey, Hills of Gold Preservation Inc financial membership and direct landholder communication with DPE, the proponent continues to deny majority local opposition and propose alternate transport routes, potentially delaying determination by the IPC and subsequent legal challenges by years.

Hills of Gold Preservation Inc has a detailed spreadsheet of supporting and objecting dwellings within 3km and 5km of proposed wind turbines. Dwellings are still being identified and pointed out to DPE.

Meanwhile, our community is paying the social cost in community division, loss of community spirit, and declining mental health.



**ENGIE**

"C7EVEN has been instrumental in their assistance on guidance in relation to project transparency for the Hills of Gold Wind Farm Project. Their timely response in relation to media requests and objector concerns has meant that this project has been provided with more credibility since their inception.

I would not hesitate to recommend C7EVEN as an asset to a project development team in the renewable energy space that requires guidance and support to meet community consultation expectations. They have exceeded in our expectations in relation to support and facilitation of new ideas and engagement for the project"

**Meredith Anderson, Development Manager, Asset Development – ENGIE**

C7EVEN public relations consultancy has been engaged to improve the credibility of Hills of Gold Wind Farm proposal, the C7EVEN website quoting Meredith Anderson, Development Manager, Asset Development - ENGIE, "...this project has been provided with more credibility since their inception...".

Hills of Gold Preservation Inc members have complained to the DPE about the use of extensive radio and press advertising, and a sponsorship program to promote the proposed Hills of Gold Wind Farm during the development and assessment phase for a State Significant Development. Only seven community groups applied for and received funding because the sponsorship program created conflict within community groups about whether it was appropriate to be used in Engie's media, implying support for the proposal. Engie's advertising campaign prompted Hills of Gold Preservation Inc to fund its own press and radio campaign. Wind farm assessment should not be an advertising arms race.

When Engie redesigned the Hills of Gold Wind Farm website recently a CCC member had to request a link to the CCC minutes because they are so hard to find. Other CCC members have had the same issue locating the CCC minutes on the website.

<https://engie.com.au/community-consultative-committee-ccc>

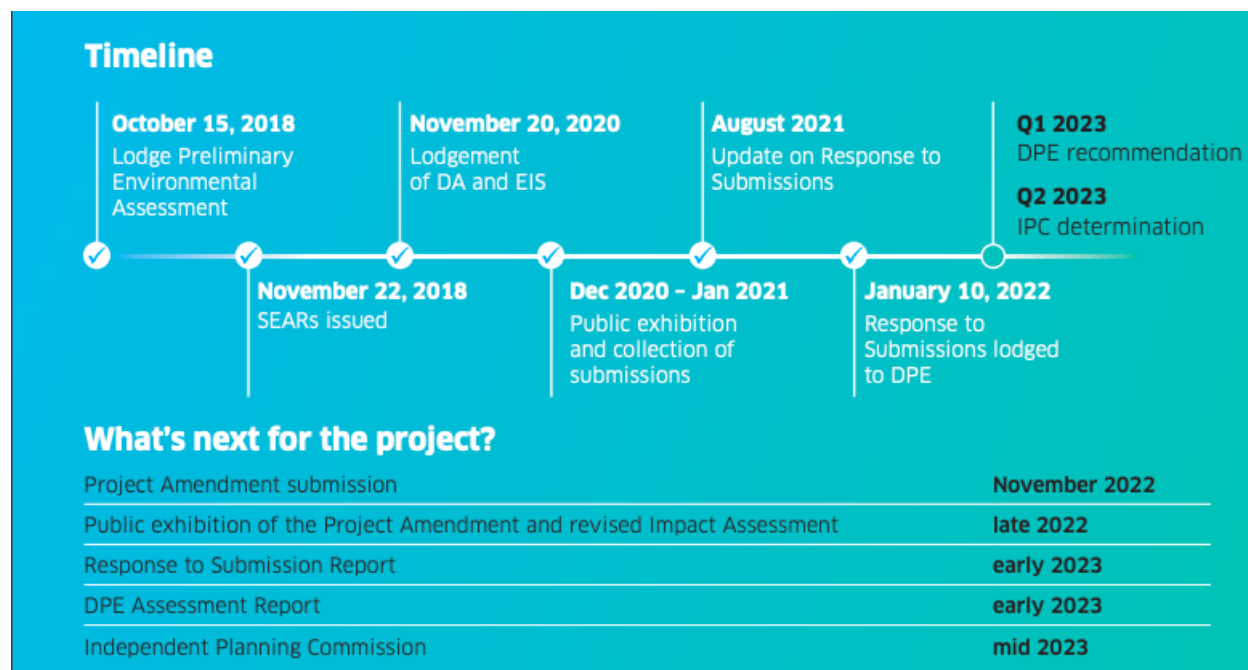
**(Attached here as Appendix 4.0 and 4.1 CCC minutes from April and October)**

The CCC minutes show a pattern of poor relations between Engie representatives and three community members opposing the proposed wind farm who were responsible for most questions at all meetings.

The October Update by videoconference is a perfect example of the dysfunction of the CCC. Only three community members attended, by coincidence the same three opposing community members who have been most engaged for the 11 meetings and two updates since June 2019. After claiming that farm track upgrades off Crawney Rd were not part of the proposal at the April CCC, the proponent did a complete backflip and presented a proposal for using three potential access points off Crawney Rd. The proponent's credibility is completely shot after community members have experienced repeated lack of transparency over nearly five years from two proponents and multiple consultants.

Community members have repeatedly asked the proponent for a public meeting rather than informal information sessions at licensed and unlicensed hospitality venues. It is a standard community practice to hold public meetings to discuss significant community issues. The wind

industry prefers to hold discussions one on one. Hills of Gold Preservation Inc ended up hosting a public meeting on Tuesday 6th December to provide an opportunity to inform the community about the Amended Development Application, attracting more than 80 people. Many people have expressed their appreciation for this opportunity. It is intimidating to enter an Engie office or informal function in a hospitality venue where you are required to speak one on one with an Engie representative, whereas it is less confronting to enter a community hall, sit down and listen to information.



Hills of Gold Preservation Inc members are concerned that the timeline published by Engie in its spring 2022 newsletter and online continues to underestimate the time yet to be expended on assessing and determining the proposed Hills of Gold Wind Farm. It also leaves out potential judicial review, deemed refusal appeals, merit appeals and merit reviews.

The Sydney Environment Institute and Australia Institute's 'Renewables and Rural Australia' research report released in June 2022. The authors propose that social licence depends on genuine investment in community infrastructure, and early, meaningful engagement.

On the ground, if there is poor site selection no amount of compensation or timing of community consultation will achieve acceptance of proposed renewables impacts. Experience with renewable energy projects such as Engie's Hills of Gold Wind Farm at Nundle has clearly demonstrated that if the local majority considers that a renewables proposal is



poorly sited, a developer can increase offers of Neighbour Agreements, announce Sponsorship programs, and boost Community Enhancement Fund offers to little effect.

The majority of neighbouring landholders will continue to reject compensation offers, many community groups will choose to not apply for sponsorship, and local government will object to the proposal.

This does not stop a developer bulldozing ahead, strategising marketing communications against local majority opinion, potentially taking years to seek determination and combat legal challenges, risking damaging its corporate reputation, and the state government and renewables industry's credibility.

No amount of community consultation can earn social licence if engagement ignores, denies, and deflects majority community opposition and concerns. Only appropriate siting, and authenticity, integrity and transparency of engagement will earn social licence.

## **6.0 NOISE & VIBRATION**



Hills of Gold Preservation Inc has engaged W Les Huson to provide a peer review of the Noise and Vibration Assessment. This will be provided outside the Public Exhibition period considering the limited time available to read and write a response.

**Quarry.** The expansion and operation of a Forestry NSW quarry creates blasting every two months, and crushing noise issues for nearby residents, as well as significant construction traffic estimated to transport 700,000-800,000 tonnes of material.

**Concrete Batching Plant.** Noise from the concrete batching plants is a concern, proposed to operate 7am-6pm Monday to Friday and 8am-1pm Saturday. Sonus (2022) states that noise from the concrete batching plant location G may exceed 35 dB(A) at three non-associated dwellings. Sonus recommends that the concrete batching plant G should not be used outside standard hours, but rural residents spend more time in their homes, farms and gardens during weekdays and weekends. Operating the concrete batching plant during the day does not mitigate potential noise annoyance.

**Traffic.** We refer to the HOGPI Review of Hills of Gold Wind Farm Response to Submissions analysis of the Traffic data, Pg 69. We remain concerned that the distances of four residences from wall/window to road pavement are measured and listed incorrectly. They are all less than 10m from the road pavement. One residence remains unidentified in Sonus's data and is 8.2m from the road pavement.

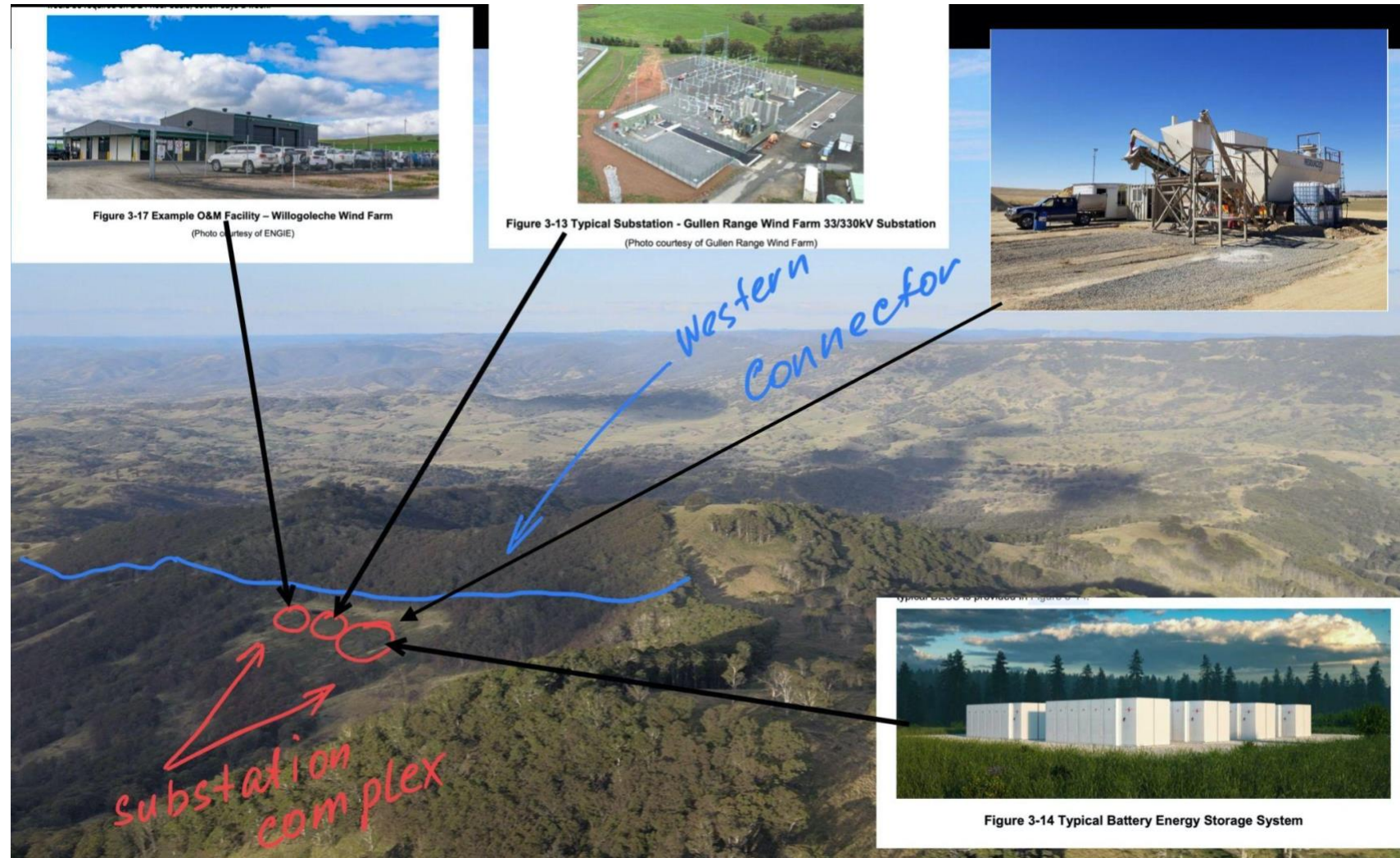
In addition, the roads are incorrectly assessed as Sub-Arterial Roads when we consider them to be Local Roads. We ask that DPE clarify the roads classifications, check the distances of five residences from the road pavement and reassess the traffic noise accordingly.

The distances of residences on the Nundle Loop and Jenkins Street/Crawney transport options do not appear to have been assessed at all.

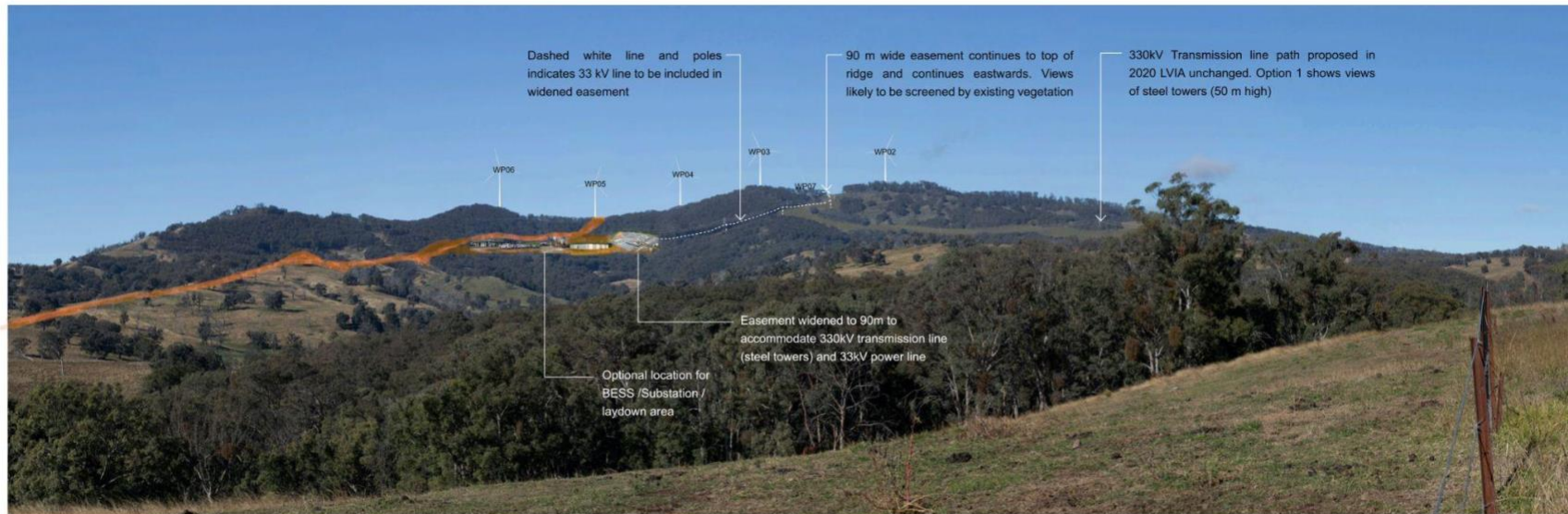
The Table below is a Modified version of the Table presented by Sonus:

Dwelling Id	Distance to road as claimed by the proponent	Actual distance from wall/window to road pavement	Easting	Northing	Predicted noise Level (dB(A)) (using incorrect distances)
TR1	11m	7.8m measured*	322218	6517795	58
TR2	11m	5.3m measured*	328439	6514703	58
TR3	12m	10m measured*	322240	6517788	57
TR4	12m	9.7m measured*	322230	6517792	57
TR5	16m	agree	322292	6517743	56
TR6	17m	agree	328126	6515339	56
TR7	18m	7m (Google estimate)	322107	6517801	56
TR8	19m	agree	324386	6516929	55
TR9	19m	14m (Google estimate)	328019	6515604	55
TR10	20m	18m (Google estimate)	323395	6517912	55
TR11	20m	12m (Google estimate)	322111	6517839	55
No ID1	Not identified	8.2m measured**	322281	6517777	??
No ID2	Not identified	19m (Google estimate)	322443	6517680	??
No ID3	Not identified	15m (Google estimate)	322174	6517818	??
No ID4	Not identified	23m (Google estimate)	324029	6517201	??
No ID5	Not identified	18m (Google estimate)	328058	6515637	??
No ID6	Not identified	24m (Google estimate)	328054	6515493	??
No ID7	Not identified	25m (Google estimate)	328070	6515437	??
No ID8	Not identified	17m (Google estimate)	328107	6515383	??
No ID9	Not identified	20m (Google estimate)	328181	6515339	??
No ID10	Not identified	23m (Google estimate)	328193	6515033	??
No ID11	Not identified	25m (Google estimate)	328206	6514999	??
No ID12	Not identified	23m (Google estimate)	328499	6514655	??





A Hills of Gold Preservation Inc volunteer created this visual depicting proponent-supplied images of typical BESS, O&M Building, Substation, and Concrete Batching Plant and their proposed location at the western end of the proposed project area. Note the supplied images are of infrastructure typically constructed on flat land, not the side of a mountain.



**Figure B.1.1.2.** Transmission Line (Option 1) Photomontage PM01 (Representative of AD\_74)

*Note: The photomontage demonstrates location and course of power lines for representation purposes only. The proposed power lines will be of subtle colour and will blend with the existing landscape.*

## HILLS OF GOLD WIND FARM | LANDSCAPE & VISUAL IMPACT ASSESSMENT ADDENDUM

MOIR LANDSCAPE ARCHITECTURE

*Another visual created by a Hills of Gold Preservation Inc volunteer showing the mountainside location of the proposed Western Connector Road (orange) and BESS, O&M Building, Substation, and Concrete Batching Plant.*



## 7.0 LANDSCAPE & VISUAL

The proponent has not provided an accurate photomontage of changes to the profile of the mountain range required to construct wind turbine foundations, hard stands, 40km of internal roads, cabling, concrete batching plants, operations and maintenance buildings, substation and battery.

Due to the steepness of the topography the construction of all wind farm infrastructure would require significant amounts of cut and fill, altering the profile of the range. It is effectively mountaintop removal to create flat constructible ground for foundations, hard stands and roads.

Existing photomontages do not give the community an understanding of the required modification of the landscape for this industrial proposal. The photomontages provided depict wind turbines like birthday candles placed in a cake with no alteration to the surface.



*When this photomontage was shown at a HOGPI-hosted Public Meeting on Tuesday 6th December, very few people in the audience had seen a photomontage from the Lindsay's Gap and Nundle Roads intersection. The photomontages provided show only wind turbines in the mountaintop, not the associated soil disturbance, and infrastructure including road network.*

The gradient of the range where access is proposed (the “Western Connector Road”) at the western end of the project, is 20-60%, greater than Devil’s Elbow. The local majority of the community are concerned that there is no evidence that the Western Connector Road is constructible to provide access for OSOM vehicles, and there is not enough detail about the destruction of the environment required to build the road.

The proponent continues to be vague about the need for Obstacle Lighting, despite a CASA requirement for two red steady 200 Candella lights on 28 wind turbines. The proponent is not



being transparent with the community that residents and visitors would be looking at an illuminated range, when they value their current dark night sky.



*Photograph of the range from Timor.*

The Soils and Water Design Mitigation Measures (Pg C24 Appendix C Updated Mitigation Measures) outlines individual vertical batter heights may be up to 10 m and minimum bench width of 4.5 m. This represents extreme modification of the landscape and raises serious safety and environmental concerns. This report does not specify where the 10 m vertical batter heights are located, but we must assume it is the wind turbine foundations, Western Connector Road or Transverse Track, all of which have no detail because they are on private land. The Western Connector Road and Transverse Tracky are both located on slopes of 20-60% on highly erodible soils. This calls into judgement the constructability of access for OSOM vehicles to the Project Area. No access, no project. Stop wasting our time Engie.

Throughout the Amended DA the proponent's consultants rely heavily on screening by natural vegetation to reduce the visual impact of roads, Wind Turbines, BESS, Concrete Batching Plants, Substation, Transmission Lines, Easement, and Towers, and Quarry. However, the local community is only too aware of the transient capacity of vegetation as a screen following brutal weather from extremes of drought and fire to heavy snow. Natural vegetation cannot be relied on to screen receptors from unacceptable visual impact. The time required for the planted trees to become established and provide screening may extend decades, beyond the life of the residents, or the wind farm. Vegetation screening is not adequate to overcome the visual impact of transmission lines/towers/easement, roads, Operations and Maintenance Building, Construction Compound, Concrete Batching Plant, Substation, BESS, disturbance to the existing landscape for residents and visitors travelling on Crawney Rd. Any changes to the landscape are observed and noted by residents, and are not viewed as part of the existing landscape

character (Amendment Report No. 2, Pg 23), they are viewed as part of the Hills of Gold Wind Farm and are not welcome.

## 8.0 CONCLUSION

The Hills of Gold Wind Farm Amended Development Application continues to omit important location specific information that would demonstrate whether the proposal is viable in terms of access, number of wind turbines, and capital investment value.

There is no acceptable transport route to the proposed project area because the intimate small scale heritage character of Nundle and Hanging Rock villages, and Timor and Crawney rural roads, are not compatible with the large scale industrial nature of the wind farm. Landholder permissions are not in place. The local majority, including Tamworth Regional Council that has objected twice, do not accept the impacts of the proposal and have previously communicated this in EIS submissions, online and offline petitions, by not accepting Neighbour Benefit Sharing Agreements, and direct communication with DPE.

Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest is listed as Critically Endangered (effective 5th October, 2022) under the EPBC Act, yet the Amended DA does not reference this. The proposal relies heavily on biodiversity offsets and Biodiversity Stewardship Agreements to achieve its claim of “no net biodiversity loss” despite potentially clearing 447 hectares of vegetation. This would impact habitat for Koala, Spotted Tailed Quoll, Barking Owl, Booroolong Frog, Border Thick-tailed Gecko, Eastern Cave Bat, Eastern Pygmy-possum, Greater Glider, Large-eared Pied Bat, Powerful Owl, Sooty Owl, Southern Myotis, Squirrel Glider and Masked Owl. The Integrity of the NSW Biodiversity Offsets Scheme Parliamentary Inquiry found that there are multiple problems with the scheme, and questions the capacity to achieve a goal of ‘no net loss’ of biodiversity.

The Capital Investment Value of the proposal is unknown. The 2020 EIS Capital Investment Value estimate of \$826.4 million (with 33 exclusions) has not been updated. There are important access issues that have not been assessed, including Oakenville Creek (Old Barry Rd and Jenkins St), Nundle Creek, and Pearly Gates bridges. Current local roads, including Lindsay’s Gap Road and Barry Road are not fit for purpose for carrying 311 additional daily light and heavy traffic movements for two years, and six daily Oversize Overmass vehicle movements for nine months.

There is no geotechnical information or engineering on the proposed Western Connector Road or Transverse Track. The amount of cut and fill, batters, and shelf width for these significant roads carrying Oversize Overmass vehicles, and associated wind farm infrastructure is too significant to go unanswered. Current Lindsay's Gap Rd and Barry Rd, and up to eight bridges, are not fit for purpose to carry the volume of additional heavy trucks and Oversize Overmass vehicles proposed. It means the community is left without full knowledge of the environmental and visual impact of road construction.

Turbines are expected to be removed to comply with Noise and Visual Guidelines, National Parks and Wildlife Request to remove turbines next to Ben Halls Gap Nature Reserve, and for compliance with Upper Hunter Development Control Plan. As turbine numbers go down and the Capital Investment Value remains unclear, how can the DPE assess whether the proposal is good value for the NSW consumer?

Hills of Gold Preservation Inc members ask that the Department of Planning and Environment recommend rejection of proposed Hills of Gold Wind Farm because of the uncertainty and risk concerning the biodiversity, topography, soil, water, access, and social division of Nundle, Hanging Rock, Crawney, and Timor.

## **9.0 CROSS REFERENCE ACTIONS REQUESTED OF DPE AND ENGIE**

### **From HOGPI Review of Engie Response to Submissions**

1. NOISE: Specify outcome of Sonus's recommendation that a further nine turbines are required to be removed for noise compliance. **NOT DONE**
2. Ensure greater certainty of noise assessment from wind turbine operation, transport, rock crushing and blasting for landholders neighbouring the project area and transport Route. **NOT DONE**
3. Conduct independent noise assessment at the closest Timor residences so that the southern side of the proposal is represented. **NOT DONE**
4. Specify parameters and meteorological conditions that would trigger reduced noise mode or curtailment of wind turbines. **NOT DONE**
5. Check Sonus's reading of the NSW Road Noise Policy for Morrison's Gap Rd, Barry Rd, and Oakenville St clarifying whether they are Local Roads not Sub-Arterial Roads? **NOT DONE**
6. Check Sonus's measurement of residences from roads listed on pg 12 and if the predicted noise levels at 10m from a road within townships is accurate for those houses. **NOT DONE**



7. Base recommendation for approval or rejection on final turbine selection not a sample turbine used for estimates. **NOT DONE**
8. Confirm which NSW government agency is liable for noise non-compliance relating to construction, vibration (construction/operation), blasting, operation and traffic? **NOT DONE**
9. NO COMMUNITY CONSENT: Acknowledge local majority opposition to Hills of Gold Wind Farm. **NOT DONE**
10. Clarify Tamworth Regional Council and Upper Hunter Shire Council Community Enhancement Funds status following wind turbine reductions.
11. JOBS: Clarify expectation of construction and ongoing jobs based on industry precedence, and give residents a realistic expectation of percentage anticipated from Nundle/Hanging Rock, Tamworth, balance of the state, and interstate.
12. TRANSPORT: Recognise that Nundle and Hanging Rock Village are not within RTA volume capacity ratio (V/C) Standard Level of A. **NOT DONE**
13. Base increased traffic volumes on the worst case scenario without car pooling or shuttle Buses. **NOT DONE**
14. Base increased vehicle movements per day in Nundle on current vehicle movements for Oakenville Rd (presumably Oakenville St) at 434, plus separate counts for Barry Rd and Morrisons Gap Rd. **NOT DONE**
15. Advise residents along the transport route from New England Highway and Tamworth to the proposed project area of increased traffic volumes. **NOT DONE**
16. Advise speed of OSOM traffic. **NOT DONE**
17. Advise worst case scenario for peak construction impacts allowing for snow and rain Delays. **NOT DONE**
18. Confirm whether there are escorts for OSOM vehicles from Port to Project?
19. Estimate potential impact on informal detour roads such as Happy Valley Rd and Duncan's Creek Rd as people aim to avoid construction traffic. **NOT DONE**
20. Directly advise landholders on potential transport routes from New England Highway and Nemingha to Project Area about increased traffic volumes. **NOT DONE**
21. Recognise increased traffic impacts to recreation areas; Chaffey Dam, Sheba Dams, Hanging Rock Lookout. **NOT DONE**
22. Advise impacts of Transmission Line construction on Crawney Rd.
23. Advise width and gradient of the proposed Devil's Elbow private road, and weight of OSOM vehicles. **N/A**
24. Advise soil profile and engineering to satisfy the constructability of the proposed road, and adequate measures for rock blasting, erosion, mass movement, sediment mitigation and road pavement flow on steep gradients. **N/A**
25. Note that Nundle school bus contractor operates from 6.30-9.00am and 3.00-5.30pm. **NOT DONE**

26. Clarify whether upgrades and environmental and first nations assessments are required of Head of Peel Rd for it to be an allocated emergency access status, and offered as potential bush fire emergency exit for Hanging Rock residents. **NOT DONE**
27. Confirm whether existing road pavement surface on transport route has been assessed and whether upgrades are required for construction use e.g half of Barry Rd currently closed due to sink hole. **NOT DONE**
28. DPE has asked for justification of using Crown Land for Public Recreation for a private haulage route when there are alternatives, and considering the process to secure land. **N/A**
29. Conduct soil profiles for Devil's Elbow private road to understand the engineering challenges of construction. **N/A**
30. Update 3D representation to accurately reflect native forest, width of haulage route and Clearing. **N/A**
31. Advise risk of asphalt "flow" downhill on the steep road and under heavy loads. **NOT DONE**
32. Provide more detail on load weights if multiple prime movers are used and whether old mining tunnels discovered under the proposed bypass can take the weight of this Configuration. **N/A**
33. Provide the community with an accurate depiction of how the private road will visually impact The Hanging Rock landmark, which the community has great affection for. **N/A**
34. Confirm which of Turnbull Engineering diagrams of Morrisons Gap road boundaries is Correct. **NOT DONE**
35. Clarify whether NSW Road Noise Policy criteria for "Local Roads - Existing residences affected by additional traffic on existing local roads generated by land use developments" applies to Morrison's Gap Rd, Barry Rd and reassess transport noise at houses within 10m of roads. **NOT DONE**
36. Provide more detailed information on the proposed car park within walking distance of Nundle. **NOT DONE**
37. Consult with Nundle Business Tourism and Marketing Group Inc regarding proposed restricted parking signage for construction workers. **NOT DONE**
38. SOIL: Demonstrate that the proposed disturbance footprint includes an appropriate allowance for constructability, implementation of erosion and sediment controls. **NOT DONE**
39. WATER: Demonstrate capacity to secure 55ML of water for the 24 month construction period considering DPE Water and NRAR note that securing entitlement from the unregulated Chaffey Water Source will be "challenging" with less than 400ML of issued Entitlement. **NOT DONE**
40. Use consistent and site specific rainfall and climate data to assess erosion and hazards. **NOT DONE**
41. Provide hydrological evidence that the proposal passes the "neutral or beneficial" test and will not cause impacts to the quality of water flowing into Chaffey and Glenbawn

Dam catchments. **NOT DONE**

42. ENVIRONMENT: Adopt NPWS request to remove all turbines near Ben Halls Gap Nature Reserve boundary. **NOT DONE**

43. Base environmental assessment and offsets on clearing mutually beneficial to agriculture and the wind farm since wind masts were erected in 2011. **NOT DONE**

44. Conduct a targeted survey for Eucalyptus Oresbia in the vicinity of the transmission line route, the Devil's Elbow By-pass, Barry Road and Morrisons Gap Road.

45. Koalas are now officially endangered and environmental assessments and offsets should reflect this. **NOT DONE**

46. Assess whether WTG 50 has been relocated onto the Crown Land and WTG 47 into State Forest. **NOT DONE**

47. Confirm status of Biodiversity Stewardship Site agreements and whether they provide like for like offsets based on IBRA regions and sub regions. **NOT DONE**

48. Confirm that stewardship sites would be located sufficiently remote from the influence of the turbines and where there is secure landscape connectivity with existing reserves. **NOT DONE**

49. CAPITAL INVESTMENT VALUE REPORT: Provide a detailed review of the CIV addressing the 33 exclusions and modifications identified in the RTS. **NOT DONE**

50. VISUAL: Identify turbine removal for landholders without agreements and inconsistent with Visual Performance Objectives of Wind Energy Visual Assessment Bulletin. **NOT DONE**

51. Assess the additional visual impact of WTG47 being relocated to a higher elevation.

52. SENSITIVE RECEIVERS: Assess sensitive receivers for visual and noise impacts. **NOT DONE**

53. AVIATION: HOGPI members do not accept impacts from aviation obstacle lighting or restrictions to agricultural aviation or bush fire fighting as identified by NPWS. **NOT DONE**

54. HERITAGE: Assess the major adverse impact of the proposed development on the setting and curtilage of the multiple listed heritage items within the Nundle township and surrounds, including natural heritage items The Hanging Rock and Yellow Rock. **NOT DONE**

55. Proposed private road on Crown Land, heritage listed in TRC LEP must be rejected. **N/A**

56. TOURISM: Note University of Newcastle report "Wind energy and tourism: industry impacts and opportunities for 'wind farm' tourism" comments regarding dependence on community co-operation, and location away from areas of high aesthetic value, and sensitive site selection. Annoyance through visual impact and noise are the strongest predictors of variables for lower acceptance. **NOT DONE**

57. Clarify if the wind farm site will be open to the public for tourism or recreational Activities. **NOT DONE**