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Date: 6/12/22

TO WHOM IT MAY CONCERN

RE: HILLS OF GOLD WIND FARM APPLICATION NO. SSD 9679

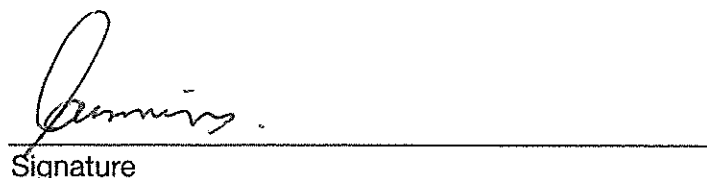
• I am attaching my submission to the above mentioned development application during Public Exhibition of Amendment Report November 2022.

• I hereby declare that I object to the Hills of Gold Wind Farm proposal ID no. SSD 9679.

 I would like my personal details withheld

• I have not made any reportable political donations in the previous 2 years.

• I acknowledge and accept the Department disclaimer and declaration.


Signature

Hills of Gold Wind Farm,

Application Number SSD-9679, EPBC ID Number 2019/8535

Objections, comments and questions on Amendment Report No. 2, dated 7 November 2022. from Colin Cummins, 39 Oakenville St, Nundle.

Question

In this document there are 99 uses of the word "option" or "options", 55 uses of "optional", and 19 uses of "optionality", totalling 174 uses. How can a proposal be properly assessed when there are so many indefinite statements?

*Will a further amendment document be provided when a final plan is created, or is it hoped that the uncertainties will be finalised **after** approval of the project?*

Is this document the final proposal?

Question

Earlier documents provided by the proponent state: "avoiding residential areas of Nundle and communities in Tamworth, Dungowan, Woolomin and Piallamore for oversized and over mass transport loads;" All traffic will use the business and residential areas of Nundle. The blades may use the entire length of both Oakenville Street and Jenkins Street. All other traffic will use Oakenville Street or Jenkins Street or parts thereof. Why is there is no assessment of the effect of traffic on the intersection of Oakenville Street and Gill Street in Nundle, which is where my residence is situated?

Comment

There is a proposal to demolish a residence in Nundle, but this is not mentioned in this report, only in the appendices.

Comment

The report also shows that for the route which is proposed from Oakenville Street to Jenkins Street behind the hotel, vegetation (actually 12 roadside trees) will need to be removed, as well as others on the private land being used for this route. I find this destruction of Nundle's streetscape to be completely unacceptable.

Further Comments and questions on Amendment Report No. 2

Executive Summary

"More supporting submissions than any other wind farm in NSW"

My response.

Also, probably more objections than any other wind farm in NSW.

"Most businesses with a shopfront in Nundle and Hanging Rock expressed support for the Project, including 90% of businesses with a shop front directly on the proposed transport route."

My response.

When was this survey conducted?

Would the result be the same if this latest proposition to use the business area of Nundle was surveyed?

1.3 Project Overview

"The project is relatively isolated and sparsely populated, away from regional townships and major regional cities"

My response.

It is located in mountainous bushland recognised for its attraction for bushwalkers, naturalists and tourists.

"More supporting submissions than any other wind farm in NSW"

My response.

*Also, probably more objections than any other wind farm in NSW.
Could the figures for support and opposition be supplied?*

"Will bring material benefits to Tamworth LGA..."

My response.

Tamworth Regional Council has objected to this development previously.

2.1 Summary of Strategic Context

"Material Employment, with the employment of 615 Full Time Equivalent (FTE) jobs during the construction period of both years of construction, 76 FTE jobs during the operation and 16 site based jobs for the life of the project."

My response.

Where would the 16 site-based personnel reside?

2.2.2.1 New England Renewable Energy Zone.

"The project is strategically located in close proximity to the southwest of the boundaries of the New England REZ"

My response.

Is near enough, good enough?

4.2.1 Nundle Over/Over Mass (OSOM) Route Amendments- Crown Land and Native Title

"The proposed amendment ... Option A ..., Option B ..., Option C ..."

My response.

*How and when will it be decided which option is to be taken up?
A Crown Land License and/or an Indigenous Land Use Agreement is required.
If these are not forthcoming, what is the plan?*

4.2.2 Optional Verden Road Quarry Expansion

My response.

What is required to turn this "option" into reality?

4.2.3 Alternative Western Substation & BESS

"One of the proposed amendments to the project is the use of an alternative transport route to the Project Area from Nundle via Crawney Road"

My response.

When will it be determined if this option is viable and/or acceptable?

"The proposed siting of the optional location/s are subject to further assessment"

My response.

When will it be determined if this option is viable and/or acceptable?

"The proposed substation would be on ... 331 Crawney Road, Crawney"

My response.

This property appears to be owned by Woonallee Simmentals of Millicent S.A. Has their approval been obtained?

4.2.4 Revised Temporary Transport Route

"One of the proposed amendments to the Project is the construction of a temporary transport route through allotments within the township of Nundle."

My response.

When will it be determined if this proposal is viable and/or acceptable?

When will this temporary route be re-habilitated?

Will a new residence be built to replace the proposed demolition?

5.2.1 Regulatory Engagement

"Subject to the Gomeroi Native Title Claim and an Aboriginal Land Claim, both currently undetermined"

My response.

What will be the course of action if a determination goes against the current plan?

Who has initiated the "Aboriginal Land Claim"?

"Feedback was sought... current proposed route... consultation with LLS and DPE-Crown Lands is ongoing."

My response.

What will be the course of action if the ongoing consultation is unresolved.

"Local Land Services... Three options for access through crown lots were investigated. The outcome of which was: ... Wombramurra Creek ...Road crossing locations should be designed and installed... LLS suggested that the proponent could commit to improving weed control in the reserve. ... The Proponent could further consult with LLS ..."

My response.

Why are there so many alternatives offered?

Will there be more alterations to the scheme to come, even another Development Application?

"LLS encouraged the Proponent to continue consultation, including provision of detailed designs for the proposed road for review after development approval is granted."

My response.

A review after approval appears to me to be a case of "shutting the door after the horse has bolted."

Table 6-2 and 6-3 Options Analysis...

My response.

Both these tables provide details on options. Why has a completed plan not been provided?

When will the decisions be made by the proponent on these options?

6.2.2 Assessment of Impacts.

My response.

Reference is made to a report from Sonus (2022). This report provides information of sound levels which would apply to Oakenville Street which crosses Oakenville Street in Nundle. Is this carelessness or inefficiency?

6.3.3 Mitigation and Management Measures

"It is recommended that subtle materials are utilised..."

My response.

If this is correct, define the use of subtle in this sentence.

6.4.2 Assessment of impacts

"The TPPP assessment indicates that the new OSOM route would have not have significant additional impacts compared with the previous proposal."

My response.

Amendment Report App H Traffic Impact Addendum, 15 October 2021, p.53 states that "no construction related traffic will use the Head of Peel Road or any residential streets in Nundle." Jenkins Street and Oakenville Street have a number of residences and they are the business district of Nundle. What will be the effect of traffic on these properties if this new route is used? Have the residents of these properties been advised of the impact, particularly of the OSOM vehicle noise?

Table 6-6 Estimated Number of OSOM Trips to Site by Route.

"Route 1. Nundle Loop 192 one-way trips"

My response.

This route uses Oakenville Street, Old Hanging Rock Road, Happy Valley Road (in reverse), River Road and Jenkins Street, the central business district of Nundle before entering Crawney Road.

What will be the disruption to normal everyday traffic caused by these long vehicles turning into Happy Valley Road and reversing to the junction with River Road?

The Nundle Public School and Pre-School are situated in Jenkins Street. How will the OSOM transport affect these schools and their students?

"Route 2. Nundle Bypass 1174 one-way trips"

My response.

This route uses Oakenville Street, Herring Street, Innes Street and Jenkins Street before entering Crawney Road.

Table 6-7 Estimated Number of Trips from Site

"Route 2 Nundle Bypass, 940 one-way trips"

My response.

Includes Jenkins Street, the main street of Nundle, so it is hardly a bypass.

"Route 3 Barry Road, 426 one-way trips."

My response.

What roads will the traffic take after leaving Barry Road?

I assume that Old Hanging Rock Road and Oakenville Street in Nundle will also be used. Why exclude mention of them?

"Route 4 Crawney Road, 940 one-way trips."

My response.

After the traffic leaves Crawney Road, it will travel along Jenkins Street, the main street of Nundle. Why omit reference to this?

"The forecast for light vehicles and general construction vehicles would now be split between Crawney Road and Morrisons Gap Road ...":

My response.

*Again, why is there an aversion to mentioning **all** the streets and roads the traffic will use. Is this a deliberate attempt to downplay the effect of traffic on the town of Nundle, through which this traffic will pass.*

Table 6-8 Traffic Splits Morning Peak Hour

My response.

This table fails to mention Nundle Township, but refers to Barry Road and Crawney Road. Why is data presented which is incomplete or incorrect?

6.4.2.1 Optional Verden Road Quarry Expansion.

My response.

This is stated as an option subject to further assessment. Two haulage routes are given from the proposed quarry. The first is via Barry Road and Morrisons Gap Road.

The second states that Oakenville St, Jenkins Street, Herron Street (Herring Street) or Innes Street will be used, subject to consultation with Tamworth Regional Council.

Another indefinite proposal. The Tamworth Regional Council has strongly objected to this project previously.

"Should the quarry become operational then it is suggested that it would operate from 7.00 am to 6.00 pm. ... It is estimated that there would be up to 14 trucks per hour. ... Using this quarry ... having the benefit of removing truck movements through Nundle and other local roads."

My response.

Another instance of providing information if something happens. What is the plan otherwise?

6.4.3 Mitigation and Management Measures

"The existing alignment can cater for B-double movements, but minor road widening to allow some passing width for light vehicles could be investigated"

My response.

Another possibility, not a plan.

"In addition to a barrier upgrade, other safety options could be investigated..."

My response.

Another case of "could be".

"Curved alignment markers (if not already present) could be considered..."

My response.

Another case of "could be".

6.8.1 Relevant Project Amendments

"Project amendments with potential historic heritage impacts are: Temporary transit route through allotments within Nundle. Optional Verden Road quarry expansion Optionality for substation"

My response.

*The proposed route from Oakenville Street to Jenkins Street also includes demolition of an existing residence fronting Jenkins Street and possible encroachments on other properties in that street. The uncertainty of what is actually going to occur if this project goes ahead is evident from the usage of the words **optional** and **optionality**.*

8. Justification and Conclusion

"...the Proponent has continued to consult with community members, community organisations, councils and relevant government agencies."

My response.

There has been no consultation with me who lives at 39 Oakenville St, Nundle regarding the transport route. When I raised the matter with an Engie representative, the comment was "We aren't going to pay you any money" to which I replied "Did I ask for any of your money? If offered, I would refuse it." On another occasion I wished to discuss some of my concerns with that same representative and the reply was "I don't have the appropriate paperwork with me".

A final question

What is the estimated level of the noise associated with the OSOM vehicles as they pass my residence and others on the proposed routes?

Dated 6 December 2022

