

Leslye Cole

29 November 2022

NSW Government
Major Projects
Hills of Gold Wind Farm
Project No.: 0550690

Dear Sir or Madam,

Please accept this submission on the development of a wind energy generating facility and associated infrastructure located 50 km SE of Tamworth, NSW re. the Hills of Gold Wind Farm Pty Ltd (HOGWF) submission report dated 20 December 2021.

A Question of Site Location

We are now at a critical point in time when it is imperative that choices we make are wise, informed, respectful to Nature, and truly beneficial to humankind. You have a monumental responsibility in representing us at a time where every decision, especially in regards to the environment, crucially affects our future.

There has been some misunderstanding about what the climate change situation entails and what we can do about it. For the past 50 years CO2 levels have been rising. All global efforts to address this have mainly been talking...talking...talking, computer modelling and more recently, attempting to reduce the amount of CO2 emissions. However, pioneering CSIRO climate scientists now understand that this abnormal increase in CO2 levels is just the *symptom* or "*canary in the coal mine*" of a much larger human-made problem.

Nature's method for cooling the planet was completely successful before human impact. Best illustrated in the classic diagram of the Earth's water cycle that most of us remember from school, which details the transpiration process. It turns out, that the very process of water from plants going up into the air is what *cools* our planet. In addition, healthy soils in a natural state behave like a type of "carbon sponge", using plants to *draw down* carbon where it is either eaten by animals or stored as soil organic matter which, in turn, increases the soil's water holding capacity.

CO2 levels have increased simultaneously as poor human land management have eroded Nature's cooling mechanism, including: the expansion of cities with a lack of vegetation or tree cover together with hard surfaces reflecting large amounts of heat and stopping water absorption into the earth; the degradation of the health of soils caused by modern agriculture (using burning, cultivating, fertilising, irrigating, fallowing, biocides); and the burning and clearing of native forests.

Up until now, political momentum has been placed on CO2 emissions, which actually only add up to 4% of the planet's heat dynamics. There's no surprise then, that there has been little to no influence on climate change. **Nature's hydrological processes, however, drive 95% of the planet's temperature dynamics** and ecologists believe that by regenerating these natural bio-systems, *together with* reducing greenhouse emissions, we can more rapidly cool the planet safely and naturally within years. Considering what these climate scientist are telling us, it is absolutely imperative that vegetation habitats, especially natural forests, must be *protected and enhanced* for our future.

The paradox of destroying native forest (nature's cooling, rain-making and carbon sequestering mechanism) which will result in the release of centuries-worth of accumulated CO2, to erect wind turbines to reduce CO2 emissions, is a contradiction. We need to increase areas of native forest and at the very least, keep these existing cooling and CO2 sequestering systems intact. Why was this *ecologically sensitive* area chosen for the site?

From "Nature Climate Change": *"...(clearing) in old-growth forests releases CO2 that has taken centuries to accumulate — carbon that, once lost, is irrecoverable in our lifetime."*

Protecting Standing Forests Is Critical for Climate Mitigation

"...data shows that keeping existing forests standing remains our best hope for maintaining the vast amount of carbon forests store and continuing the carbon sequestration that, if halted, will worsen the effects of climate change."

To locate a wind farm on the proposed site would result in the release of so much carbon into the atmosphere during construction, that it may not ever be able to "save" during its operating lifetime.

Resources: <https://www.regenerate-earth.org>

Regarding the Submissions Report

Re: 3.1 Number of Submissions

63% of submissions Object the project

The following statement on the report can be explained because residents in the stated LGAs were *not notified* by the Proponent of the development before the close of the first round of public submissions.

"Public submissions received from residents in the other two LGAs which the Project Area is situated within were significantly less, with a total of 17 (2.8%) submissions

received from Upper Hunter LGA, and 3 (<1%) submissions received from Liverpool Plains LGA”

Re: Landscaping Program for Transport and Visual

“There have been discussions with landowners regarding the option for visual screening have been mentioned in consultation with landowners within 5 km of the Project.

Visual (vegetative) screening mitigation measures . . . will be offered to those residents it will be effective for and are within 4.55 km of the Project.

The following additional mitigation measures will be implemented for high to moderate impacted dwellings within 4.55 km:

- planting to be undertaken post construction of the Wind Farm;*
- 50 / 75 Litre tree stock to ensure plants establish;*
- recommended evergreen tree species that reach a minimum height required to sufficiently screen turbines”*

and

“Residents along Morrisons Gap Road and dwellings with moderate to high visual impacts have been advised of the opportunity to have vegetation screening provided if they elect. The program would provide optionality to residents to have the screening organised for them or to receive payment to complete it on their own behalf. There would be reference to distance away from turbines, which would help determine the level of screening commitments required.”

What an insult the previous responses are. Here is an analogy of the situation that city people might understand:

Let's say Engie decides they want to build a wind farm on Sydney Royal Botanic Gardens. Although it is understood that we need cleaner energy, the majority of the residents who enjoy the magnificent views of Sydney Harbour, having paid a premium for the privilege, complain that their view will be ruined, and that the wind farm is not in-keeping with the amenity of one of the most scenic locations on Earth.

Engie happily offer to plant vegetation screening for those residents who so wish, strategically placed so as to block out the turbines. Now, instead of their majestic, expansive view, they look out onto a screen of trees, which although beautiful in their own right, is *not* the unique and spectacular Sydney waterway vista which is integral to the lifestyle, and quality of life of the impacted residents.

The attractive, character-filled historic town of Nundle, surrounded by rolling countryside which look towards a majestic backdrop of mountains rising up to the east

is also one of the most picturesque locations in the whole of Australia. In just one visit to the proposed site you would find this area just as precious and unique as Sydney Harbour. Truly worth protecting for generations to come. While scouting areas to one day make our tree-change, the excitement we felt when the Great Dividing Range came into view on the horizon as we drove north from Sydney on the New England Highway drew us in. The beauty and opportunity of the so-called Hills of Gold called us—of all the places we had visited before, and that's what chose our final destination. We bought a farm neighbouring Nundle, nestled in the same foothills of the Great Dividing Range to spend more time immersed in nature, be part of a close-knit community, live slower and more simply.

It is well known that fresh eyes can see things differently, and maybe this is the case as longterm residents might not appreciate how special the area truly is?

As the Proponent faces obstacles in it's attempt to bulldoze this Project ahead, they plan to splash more cash around to landholders, neighbours, their neighbours neighbours, town community members, councils, kick-backs in the form of discounts on energy bills for a select number of residents etc. Which is all OK if the cost of the ramifications of this project didn't far outweigh the "carrot" being dangled in front of the affected community.

Being easy targets, Councils are particularly susceptible, as it is an expensive business to maintain the LGA they are responsible for, especially in a country like Australia with such wild extremes of weather. All it took was a \$45,000 agreement with Upper Hunter Shire Council for them to completely disregard 17 articles in their own **Local Environmental Plan 2013** (following). A document drawn up by previous councillors as stewards of their LGA with the express wish to protect the environment they were responsible for in their day and for the future. Are these people true representatives of their constituents?

6.2.4.2 Upper Hunter Shire Local Environmental Plan 2013

a) "to encourage the proper management, development and conservation of natural and human- made resources in the Upper Hunter by protecting, enhancing and conserving the following—

- i) important agricultural resources,
- ii) timber, minerals, soil, water and other natural resources,
- iii) the environmental, scenic and cultural heritage of the Upper Hunter,
- b) to protect and conserve—
 - i) soil stability by controlling development in accordance with land capability, and

- ii) remnant native vegetation, and
- iii) water resources, water quality and wetland areas, natural flow patterns and their catchments and buffer areas,
- c) to establish a pattern of broad development zones as a means of—
 - i) separating incompatible uses, and
 - ii) minimising the cost and environmental impact of a development, and
 - iii) maximising efficiency in the provision of utility, transport, retail and other services,
- f) to secure a future for agriculture by expanding the Upper Hunter’s economic base and minimising the loss or fragmentation of productive agricultural land,
- g) to protect, enhance and provide for biological diversity, including native threatened species, populations and ecological communities, by long-term management and by identifying and protecting habitat corridors and links throughout the Upper Hunter”.

RU1 – Primary Production. The objectives of this zone is as follows:

- “to encourage sustainable primary industry production by maintaining and enhancing the natural resource base.
- To minimise the fragmentation and alienation of resource lands.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.
- To protect the agricultural value of rural land.
- To maintain the rural landscape character of the land in the long term”.

Table 6-6 Wind Farm Provisions from the Upper Hunter DCP 2015 Design Guidelines specifically states that:

‘Ridgelines dominated with wind turbines will not be favoured’

I have not seen any successful resolution in the Response which would mitigate my original concerns:

The protection and conservation of the fragile ecological environment that is threatened by the development. Specifically, the endangered and critically endangered flora communities, the endangered and critically endangered fauna, also the physical structure of the ridgelines and plateaus of the project area which perform the vital water

recharge function as a source of the groundwater storages of the Hunter, Barnard and Peel river catchments.

Since the commencement of engagement with stakeholders in 2017, the situation for our wildlife has changed dramatically due to the Black Summer bushfires — one of the worst wildlife disasters in modern history. The koala has been identified as being vulnerable to extinction, with surveys by ecological consultancy Biolink, finding 71% of koala populations died in 6 study areas of NSW after the fires. As detailed in the Environmental Impact Statement (EIS), there are thirteen threatened terrestrial fauna species directly within the Development Footprint, including the *seriously threatened* quoll and *critically endangered* koala.



Spotted-tailed Quoll. Photo from game camera in neighbouring Ogunbil NSW

The proposed works include the removal of 327.24 acres of native vegetation. Of the area to be cleared for the project's internal roads, 40-45% is threatened ecological communities. The area immediately surrounding the project location already has 44,874 acres of native vegetation removed due to State Forest timber production — 3,212 acres in Nundle State Forest, 11,861 ac at Hanging Rock and 889 ac at Ben Halls Gap, resulting in ridgelines of a radiata pine monoculture, uninhabitable by many native animal species. Adding to their plight, regular logging operations leave large tracts of land completely bare. Much of the remaining land in the area is cleared and semi-cleared agricultural farmland.

Consequently, *all* remaining native bushland must be protected as being extremely valuable habitat for every section of threatened ecological flora communities detailed in the EIS. The only existing protected nature reserve, Ben Halls Gap, at 2,500 ha, is now under threat to be impacted by at least 13 wind turbines.

In Australia, its the in-ground water that keeps the landscape alive. Water percolates from higher ground *recharge* areas of well-drained soils, moving down through the strata to be stored in the layer of sand and clay that underlies much of the continent for use by plants during the inevitable dry spells. This aquifer is the source of springs and bores. The classification of the soil within the Project area as almost entirely ferrosol suggests the whole site is one of those valuable recharge areas. These soils are only found in well-drained sites with rainfall between 700mm and 1450mm. Ferrosols have high agricultural potential because of their good structure and moderate to high chemical fertility and water-holding capacity.

Interrupting the natural filtration of water through soils on the ridgeline, by covering it with hard and compacted surfaces risks effectively 'plugging' an entry point of underground water in the landscape. Could this impact the aquifers in the wider surrounding catchments of the Hunter, Barnard and Peel river catchments, the Liverpool Plains and other flood plains? Is NSW State Government willing to take that gamble?



Regarding the original biodiversity study, specifically the noted bird species in the proposed site there was at least three major raptor omissions, and a serious underestimation of the number of Wedge-tailed Eagle *Aquila Audax*. I am a keen birdwatcher and have observed the Little Eagle *Hieraetus morphnoides*, Brown Falcon *Falco berigora*, and Swamp Harrier *Circus approximans*, flying over the ridgelines at our farm every year at Ogunbil, approximately 35 km from the site. The Little Eagle searches for prey by soaring up to 500m altitude. Considering their flight path is known to stretch 3,300 km it is reasonable to assume it would frequent the proposed site. The Brown

Falcon is known as a wind turbine collision victim flying up to 2000m elevation. The Swamp Harrier also hunts by soaring and gliding often at great heights up to 1700m. I have also observed 7 wedge-tailed eagles feeding on the one carcass at the same time.

Re: Aviation Safety

I have observed two fixed wing crop-dusters working in tandem in the most amazing aerial acrobatic display on the one property on the Crawney Road, 8 km away from the proposed site, fulfilling their fertiliser application contract. What risks would there be to these contractor's employment and/or safety with the placement of 61 turbines surrounding the area?

Is it acceptable that a company arranging for French and Japanese companies to buy into productive Australian agricultural land now dictates to the surrounding farmers how they can manage their property when, as savvy business people in their own right, they employ the best contractor for the job at hand?

A lot has changed since this project was proposed in 2017. There has been a huge shift in Australia's regional economy with diversification of income and employment. Rural areas are no longer dependent on the agricultural sector, especially since COVID-19, with the pandemic changing the way we live and work. The year 2020 prompted a rethink of priority for many as working from home became the new norm. This motivated large numbers of tree and sea-changers to search for rewarding and healthy lifestyles in rural and regional areas, taking advantage of lower rent and house prices. University research has recorded 'a new love of nature' for people since the start of lockdown, with city dwellers yearning to spend more time in, and have connection with nature. There continues to be an influx of people into regional areas bringing their income with them as seen in the Tamworth real estate and building boom of 2022.

The recent drought has also kick-started an enterprising business initiative in #buyfromthebush which has diversified income in the rural economy. Social media has offered country businesses a direct line to their city kin. The rich pool of talent and ingenuity in the country is broadcast with a never ending array of creative products being showcased, purchased by customers who enjoy knowing exactly where their money is going and what impact it is having. Farmers have also taken advantage of the increased desire for beautiful landscapes and open spaces, diversifying their income with farmstays and the exploding market of hosting Airbnb's.

Re: Impact to Tourism (Page 105)

"A small but developing body of academic literature on the concepts of 'energy tourism' and 'wind farm tourism' demonstrate that globally, wind farms attract significant tourism interest. Visits, tours, walking trails, and events can be offered to tourists to enhance the tourism value of a wind farm project."

It appears that the Proponent is suggesting that the many existing streams of tourism which bring millions of dollars of revenue into the region for the historic character of the quiet country town of Nundle; the scenic beauty of the landscape; fossicking in attractive streams; farmstays; multiple music events and workshops; the unique retail stores; art galleries; mushroom foraging; and the award winning Nundle Woollen Mill—all perfect Instagram material because of their majestic skyline and country style aesthetics—can be replaced with just one. *“Wind farm tourism”*. Continuing on with reducing the biodiversity of the landscape, the Proponent risks reducing the biodiversity of the whole region!

The vibrant town of Nundle is run by enterprising, entrepreneurial and caring business people who have individually and collectively attracted hundreds of thousands of visitors, and consequently, revenue to the town, and to the Tamworth region. Although a small community, they are passionate members who punch well above their weight, winning heritage awards for preserving the built history of the town, and Community Leadership awards. They host a full calendar of events, including the annual Nundle Go For Gold festival which alone generates about \$400,000, attracting up to 16,000 visitors over 2 days, Hats Off To Country, The Great Nundle Dog Race, The Nundle Country Picnic to name a few. The Nundle Woollen Mill has won multiple tourism awards, educating about the original mill and the region’s rich wool producing history. The Dag Station plays an integral part in the Tamworth Country Music Festival, the owner being a fine musician in his own right, hosting songwriting clinics for up-and-coming artists, and concerts throughout the festival. The annual event regularly brings 40,000+ visitors to the region, contributing more than \$50 million to the local economy.

Tourists come to the area for the country music, horse events, fossicking, heritage, the slow pace and beauty of Nundle and the surrounding landscape. It offers a step back in time which appeals to history buffs and those with ‘slow living’ values, looking for an authentic country experience. The recent COVID-19 lockdown popularised this slow living concept, epitomised by the craze of making sourdough bread. Could thousands of visitors disappear from the area, along with their revenue? There is a real risk of Nundle becoming a ghost town, resulting in the passionate business owners packing up to move elsewhere.

Many farmers around the area have retired to the town of Nundle, bringing their money with them. My husband and I had planned to do the same — but that will be off the table if the wind farm goes ahead.

Once again, Tamworth Council has to seriously consider how important this town is to the region.

What does the NSW Government, Tamworth Regional Council, Upper Hunter Shire Council, and Liverpool Plains Shire Council stand to gain with a proposal which goes against so many stipulations on their Local Environment Plans?

6.2 NSW Legislation 6.2.1 Environmental Planning and Assessment Act 1979

(e) “to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,

(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)”,

Tamworth Regional Local Environmental Plan 2010

- a) “to encourage the orderly management, development and conservation of natural and other resources within the Tamworth region by protecting, enhancing or conserving—
 - i) important agricultural land, and
 - ii) timber, minerals, soil, water and other natural resources, and
 - iii) areas of significance for nature conservation, and
 - iv) places and buildings of archaeological or heritage significance,
- b) to allow flexibility in the planning framework so as to encourage orderly, economic and equitable development while safeguarding the community’s interests and residential amenity
- c) to manage and strengthen retail hierarchies and employment opportunities, promote appropriate tourism development, guide affordable urban form and provide for the protection of heritage items,
- d) to promote ecologically sustainable urban and rural development and control the development of flood liable land, and
- e) to secure a future for agriculture by expanding Tamworth’s economic base and minimising the loss or fragmentation of productive agricultural land.
- To restrict the establishment of inappropriate traffic generating uses along main road frontages.
- To permit development for purposes where it can be demonstrated that suitable land or premises are not available elsewhere”.

6.2.4.3 Liverpool Plains Local Environmental Plan 2011

- a) “to encourage the proper management of the natural and man-made resources of Liverpool Plains by protecting, enhancing or conserving—
 - i) productive agricultural land, and
 - ii) timber, minerals, soils, water and other natural resources, and

- iii) areas of significance for nature conservation, and
 - iv) areas of high scenic or recreational value, and
 - v) places and buildings of archaeological or heritage significance,
 - b) to manage the urban areas of Liverpool Plains by strengthening retail hierarchies and employment opportunities, promoting appropriate tourism development, guiding affordable urban form and providing for the protection of heritage items and precincts,
 - d) to provide a secure future for agriculture by expanding Liverpool Plains' economic base and minimising the loss or fragmentation of productive agricultural land,
 - e) to minimise land use conflict,
 - f) to ensure that development has regard to the capability of the land,
 - g) to provide a choice of living opportunities and types of settlement within Liverpool Plains,
 - h) to ensure that the efficiency of arterial roads is not adversely affected by development on adjacent land,
 - i) to enable development that has proper regard to the environmental constraints of the land and minimises impacts on biodiversity, water resources and natural landforms".
-

Australia continues to lead the world in rooftop solar with one in four households now generating power on their roofs. 2021 was the fifth record-breaking year in a row for rooftop solar as Australians installed approximately 380,000 new systems with a combined capacity of 3.2 gigawatts. This brings the total to 17 gigawatts – a virtual power station comprising more than 3 million rooftops – as the largest generator in Australia. Millions of Australian Residents are now quietly financing and generating their own electricity and returning even more back into the grid. And our country is still being accused of being behind in reduction of greenhouse gases. Is this really true, or have we actually been behind in creating awareness of our incredible uptake of residential renewables?

Surely, *this* is the enduring monument of our generation that will go down in history, demonstrating the wisdom and foresight of our federal, state and local governments for future generations. Any great leader would be proud that their government and its constituents have come together to move toward a better and cleaner environment. Rather than a poorly located wind farm of 61 monstrous machines on one of Australia's most beautiful landscapes, which the Report estimates will only generate power for

182,000 homes, quickly becoming technological dinosaurs after only 25 years. At which time, they will need to be dismantled and removed — and by *who*?

Might our money be better and more appropriately spent on developing more improved capacity for battery storage and utilisation of the power that the existing millions of rooftop panels are already feeding into the grid? *This* is the way of the future. Two of Australia's energy retailers, Origin and AGL, have publicised their intention to build and install Australia's largest batteries to connect to the grid to store the excess electricity feeding into it, in their transition away from coal-fired electricity.

Looking to the future, its inevitable that there will be even more uptake of domestic small-scale solar for clean energy generation. An awareness campaign informing the public about the success of the government incentives, including the Small-scale Renewable Energy Scheme and its uptake by residents would also go a long way to demonstrate how they are planning for the future and already achieving a more sustainable energy Infrastructure.

This is potentially the most significant change to the Nundle landscape since European settlement and the gold rush. However, instead of helping to add richness the town, I am worried this development might just cause its demise. The proposed Hills of Gold Wind Farm is not a choice between fossil fuels and renewables, but a choice about the environmentally sensitive siting of renewables and for choosing the most economically viable, suitable, and cutting edge technology appropriate for 2022 and beyond.

Contrary to the unbalanced portrayal of community support for the project in the Report, the majority of the Nundle and Hanging Rock communities have signed petitions opposing the proposed Hills of Gold Wind Farm and do not want to destroy the environment to save the environment.

For these reasons I **oppose** the Hills of Gold Wind Farm.

This crucial decision is now in your hands. Will you decide to work *with* Nature in speeding up human attempts to cool the planet, while saving a town, its livelihood, Tamworth's revenue, critically endangered flora and fauna? Or pander to a greedy multinational, and all those with their hands out, who stand to rake in multiple hundreds of millions of Australian dollars annually.

As each one of these irreplaceable habitats are destroyed around the world, it only accelerates our civilisation's journey as it hurtles towards global warming oblivion.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Leslye Cole'.

Leslye Cole