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Our Reference: OUT-1474/21

8 March 2021

Department of Planning, Industry & Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Attention: Anthony Ko

Dear Sir,

Hills of Gold Wind Farm (SSD-9679) – Supplementary Submission

Further to Council's submission dated 29 January 2021, we would like to raise the following additional concerns with the proposed Hills of Gold Wind Farm project (SSD-9679).

1. Non-compliance with Part 8c of the Upper Hunter Development Control Plan 2015

Whilst we acknowledge that the proposal is not bound by the development controls prescribed by the Upper Hunter DCP 2015, we note that the proposal does not comply with the following controls:

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| C. Cumulative Impact | The design guidelines state that ridgelines dominated with wind turbines will not be favoured. The proposed development does not comply with this requirement with a number of the photomontages contained in the Visual Impact Assessment (eg Photomontage 10) clearly depicting ridgelines dominated by wind turbines. It is recommended that the proposal be amended by reducing the number of turbines to ensure ridgelines are not dominated. |
| D. Distances from public roads & boundaries | The outcomes to be achieved specify that the proposal is not located within a distance equivalent to 2 times the height of the turbine (including the tip of the blade) from the boundary of a formed public road or a non-host property boundary. Given that $2 \times \text{blade height (230m)} = 460 \text{ metres}$, it appears that wind turbines WP31, WP32, and WP33 would be in breach of this control. It is recommended that the proposal be amended by removing turbines WP31, WP32 and WP 33 or by relocating these turbines to ensure compliance with the development control. |

All correspondence to:

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2. Land Capability

The land and soil capability (LSC) mapping, as shown in Figure F4-2 of Appendix O of the EIS - Soils and Water Assessment identifies large areas of LSC Class 7 Very low capability land and Class 8 Extremely low capability land within the project area. Under the Land and Soil Capability Scheme Classification (OEH, 2012), Class 8 land is characterised by limitations so severe that the land is incapable of sustaining any land use apart from nature conservation. There should be no disturbance of native vegetation. These areas are typically highly susceptible to severe erosion and degradation.

Notwithstanding the classification of the land, the erosion hazard has been assessed as low-moderate using the Revised Universal Soil Loss Equation (RUSLE) provided in Appendix A of the Soils and Water Assessment. We note however, the assessment only considers areas of disturbance where turbines are proposed (along the flatter ridgeline) and does not consider the steeper slopes (eg, roads and road batters) where greater erosion hazards will exist. Given the land and soil capability classification of the project site, further consideration of the erosion hazards on the steeper slopes (where roads and drainage channels are proposed), along with required erosion control measures, is warranted.

3. Alleged unauthorised land clearing

Council has been made aware of alleged illegal land clearing on one of the host properties within the project area. Whilst the clearing activities may not be related to the project, such activity is of serious concern to Council and it is hoped that any unauthorised clearing has been investigated and appropriate action taken by the relevant authorities.

We trust the above additional comments will be given due consideration by the Department in its assessment of the proposed development.

Please do not hesitate to contact Mathew Pringle, Director Environmental & Community Services, should you have any questions regarding the content of this submission.

Yours sincerely



Greg McDonald
GENERAL MANAGER