

*There is no real need
for this project as
the NSW government has an
over supply of wind farm
developments required to meet
clean energy targets.*

*Initial excitement and hype
over the location's wind resources
has ignored the reality of
impossible access routes
to the project site.*

See details overleaf

Objections to the Amended DA for the Hills of Gold wind farm

No shortage of wind farms in our area

Fortunately the NSW government is blessed with an oversupply of renewable energy projects to provide the transformation required to meet net zero targets. In the wider area around Nundle there are three significant wind farm applications; Bowman's Creek near Liddell, Winterborne near Walcha and Thunderbolt near Kentucky, hence there is no need to undertake the challenging logistical problems unique to approval of the Hills of Gold wind farm.

Visual impact is vastly undervalued

The Amended DA tries to suggest that all issues have been addressed yet the initial main concern remains; the visual and environmental destruction of more than twenty kilometres of the Liverpool Range ridge line, a section known as the Hills of Gold. This ridge line defines the identity of Nundle. No degree or methods of mitigation and offsets can overcome this drastic transformation of Nundle's environment.

Poorly conceived project

It seems that originally the Proponent was over excited by the potential wind resources of the location on one of the highest sections of the Liverpool Range without considering the serious logistical problems of access to the construction site. The Amended DA fails to address issues related to the transport corridor through Nundle village and access to the ridge line some 1200m to 1400m above sea level.

Offsets? What offsets?

References to the offset program in the Amended DA indicate inadequate, unsatisfactory and yet-to-be confirmed arrangements to compensate for the environmental and biodiversity impacts of this project. In theory, offsets should compensate for the destruction of habitat caused by development by protecting and improving equivalent habitat elsewhere. It's widely recognised that offset programs are stacked with anomalies. The offset program for HoGWF certainly cannot guarantee 'like for like' because the environment under impact is unique and special.

Moving turbines is like juggling deck chairs on the Titanic

Relocating structures a few metres here or there when they are as high as 230m will have minimal or no effect on improving biodiversity. Removal of WTG 41 and the 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 difficult to comprehend how the application for this project was accepted in the beginning because it so closely neighbours two significant nature reserves.

Heritage protection of Nundle

The Amended Historic Heritage and Aboriginal Cultural Historic Reports are positive outcomes of the DA process but both these reports fail to highlight the overall impact on Nundle village and its surrounds. The Proponent acknowledges that all wind farms involve a certain degree of impact. This project is an example of unreasonable and excessive impacts on the local community and environment in the way it destroys the historical character of the district.

Morrisons Gap Rd upgrade

It was poorly conceived to propose this quiet rural road as the primary access route in the original EIS hence the removal of the retaining walls in the Amended DA is understood. However the reduced upgrades outlined in the Amended DA are short on detail, consequently there is a real concern that increased traffic on this road will create dangerous black spots as well as threaten precious wildlife.

Impossible access to the project site

Replacing the Devils Elbow access with the Crawney Road route does not solve any problems. The same issues remain: private road on Crown Land, Native Title clarification, unresolved engineering details for the steep incline, unspecified biodiversity impact. So it can be expected that Tamworth Regional Council will transfer its objection for similar reasons to its rejection of the Devils Elbow Barry Rd Morrisons Gap Rd route. This issue of impossible access should have been red flagged when the application for the project was first lodged in 2018.

Water, water, water

The 64 large concrete pads required for the turbine towers and other project infrastructure will have an immeasurable impact on the water table which feeds the Peel River system. This impact, together with the close proximity of Ben Halls Gap and Crawney nature reserves, makes the location for this large wind farm completely untenable.

No social licence

It is most unfortunate that the promotion of this project has caused major divisions within the local community, fracturing a feature of Nundle that was once highly valued. It is difficult to see that such division, which now seems to be so entrenched, can be rectified in the future.

Failure of neighbour agreements

Approximately 70% of neighbours within 5 kilometres of the project zone have not signed agreements to become associated. The majority of neighbours indicate that concern for the impact on their property, as well as the overall impact of the project on the wider community and the environment, is greater than any financial benefit and conditions in so-called neighbour agreements. Rather than being titled *agreements* or *benefits*, such arrangements should be classified as *compensation*.

Future of wind farms is at sea

It is encouraging to see that turbine technology is making rapid advances in size and capacity to the extent that the real future of wind farms is NOT on ridge lines such as the Hills of Gold but offshore. Plenty of international examples already prove this is so, illustrating that a project such as the Engie HoGWF has passed its used-by-date. Newly developed extra large turbines at sea make redundant the relatively 'low capacity' turbines on the ridge line near Nundle.

Conclusion: location, location, location - wrong, wrong, wrong

The Hills of Gold wind farm is an example of a large renewable energy project in the wrong location. It provides an opportunity to set a new benchmark in terms of wind farm regulations and guidelines. This project is an excellent example for a case study on inappropriate location selection and application mismanagement.