

Almost two years on from when the proponents Hills of Gold wind farm EIS was submitted for exhibition, I once again reluctantly find myself dedicating considerable personal time to view, consider and comment on a proposal that continues to disappoint.

The cliché phrase, “shuffling deck chairs on the Titanic” springs to mind if I was to give a simple summation of the currently exhibited amendments to the proposed Hills of Gold wind farm.

### **Bushfire risk:**

Whilst commendable the proponent has considered section 8.3.6 of the NSW RFS Planning for Bushfire Protection 2019 document to suitably site the temporary crib room and toilet at the proposed Verden Road quarry within an asset protection zone, the same consideration appears not worthy of consideration when it comes to the unassociated neighbours of the proposed wind farm.

The proponent appears comfortable to impose “screening plantations” to mitigate visual impacts on several close neighbours properties, yet ignores the intent of the NSW PBP 2019 document, particularly Appendix 4 A4.1 Asset Protection Zones.

The presumption that a vegetation screen is the fix for visual impacts without neighbour consultation and assessment that the proposed vegetation screen will not increase bushfire risk and impinge on a property APZ is flawed and unsympathetic to say the least.

In May 2022 I spoke to a senior planning officer within the NSW RFS to discuss this concern and was assured the proponent would be required to address this clear conflict between vegetation screening within the defendable space of a dwelling. I was also informed that my secondary concern of the potentially restricted aerial firefighting capabilities on properties surrounding the proposed wind farm would not be impaired should the HoGWF be approved. The NSW RFS officer was to confirm in writing that the two above issues were addressed, 7 months on I am still waiting for that confirmation. I can't help but think the NSW RFS is reluctant to be seen as impeding renewable energy development, despite valid community concerns.

Section 6.6.1 of the November 2022 Amendment Report indicates the removal of WTG 41 is to create a 1.2km spacing between turbines due to the NSW NPWS concerns regarding restricted aerial firefighting and barrier effects to birds and bats. Whilst I believe the removal of WTG 41 is merely a token gesture to address the above issues, it is confirmation to some of us in the community that reduced aerial capability for firefighting will result from the proposed turbines despite the proponent earlier refuting this concern.

## **Unacceptable Biodiversity Impacts:**

I find it quite timely that recent media coverage has highlighted a number of Government agency reports and international agreements alerting policy makers to the continued biodiversity loss occurring in Australia. The reports expose our current planning controls are evidently failing to halt biodiversity loss.

The proponent asserts the HoGWF is essential in helping to meet the goals of the Paris Climate Agreement, equally as important, but somewhat overlooked is the biodiversity loss that is occurring worldwide. Australia is unfortunately a world leader in mammal extinctions and is on track to continued extinctions. The HoGWF is ticking boxes to a broken biodiversity planning system that is facilitating further extinctions.

“There are twin crises that we face – the biodiversity crisis and the climate crisis – and one of them gets a hell of a lot more attention than the other,” Lead Councilor of the newly formed Biodiversity Council Professor Brendan Wintle

The Commonwealth Government's Samuel report and NSW Auditor General's report were very critical of the current biodiversity protection settings for failing to halt biodiversity loss. This is particularly pertinent to the proposed HoGWF, as the project will be reliant on a discredited NSW offsets scheme to allow project infrastructure to be built and on aspirational wildlife corridors.

Further, the proponents proposal has failed to account for the cumulative biodiversity loss that will occur as a result of illegally cleared native vegetation by a turbine host for agricultural use.

*(recently highlighted by Federal Environment Minister Tanya Plibersek “The government said its approach was aimed at addressing the cumulative impacts of development”)*

The following statement is the only response I am aware of that the proponent has publicly released regarding the illegal land clearing.

*“Allegations of unauthorised land clearing have been investigated by the relevant authorities and as a result a Conservation Land Agreement has been established. Hills of Gold Wind Farm has not undertaken or authorised any land clearing over the project site.” ENGIE 2022 Autumn Newsletter.*

This pathetic lack of detail has continued to fuel speculation, rumour and division in the community.

The proponent has a contractual agreement with the entity that undertook the unauthorised clearing and may benefit from reduced biodiversity offset obligations as result of the unauthorised clearing.

This matter is therefore in the public interest to be informed of the specific details regarding the "Conservation Land Agreement " which is unknown to the public.

After undertaking a search of the NSW Local Land Services public register I was unable to find any details of set aside areas for any lots located within the project area, however after a search on the NSW Native Vegetation Regulatory Map Viewer a significant area appears to have changed classification to "sensitive regulated lands", which I can only assume is a set aside area to offset the unauthorised clearing activities. The boundaries of the regulated lands appear to miraculously follow the proposed development corridor of the HoGWF.

Local knowledge of the vegetation types that were present prior to the unauthorised clearing suggest that the assumed set aside area is not like for like vegetation type for what has been removed. Given the significant ambiguity and limited response from the proponent regarding this matter I find it inconceivable that the consent authority is continuing to assess the project without the proponent supplying clear evidence that previous unauthorised clearing and proposed new clearing and infrastructure is not resulting in cumulative biodiversity loss to the site without clear, transparent, and verifiable offsets.

Some quotes to reflect on regarding the NSW Biodiversity Offset Scheme:

*"Key concerns around the scheme's transparency, sustainability, and integrity are yet to be fully resolved." NSW Auditor- General Margaret Crawford.*

*"The NSW State of the Environment 2021 report identifies habitat destruction and native vegetation clearing as presenting the single greatest threat to biodiversity in the State." - Executive Summary*

<https://www.audit.nsw.gov.au/our-work/reports/effectiveness-of-the-biodiversity-offsets-scheme>

The proponent has asserted that there are no Powerful Owls after a grand total of 8 survey nights, additionally, as they have a large home range they're unlikely to be significant numbers present and therefore of little concern.

If the numbers are low, then it's even more critical that they are not impacted by blade strikes!, particularly when they pair and mate for life (30yrs). Yes, sighting Powerful Owls is difficult. In 40 yrs of being in the area I could count on two hands the amount of encounters or feathers I have personally witnessed along with the remnants of possum fur and bones in owl pellets on the lawn. The proponent continues to ignore concerns regarding Powerful Owl mortality and the resultant implications that may have on Greater Glider populations in BHGMR given the Owls main diet is that of Possums and small mammals. The proponent should not be granted permission to conduct a science experiment with our endangered fauna.

The proponent is quick to promote the proposed HoGWF as part of the solution to the "climate crisis". Whilst a noble pursuit, I can't help but view this greenwashing project with a large degree of scepticism. It is primarily a profiteering exercise for a large foreign company, who has no

direct connection with our community or country other than a commercial lease agreement to exploit our natural resources with little regard to our native flora and fauna. The proponent presumes a fat cheque book can simply buy biodiversity loss. This is not good enough, two credible Government reviews prove that.

### **Aviation, wildlife barrier impacts:**

Although the NSW RFS appears to be mute on turbine placement offsets to boundaries, the NSW NPWS and DPE BCS team share the concerns I have with turbines close to the BHGMR that will impede aerial firefighting/ park maintenance activities and create a barrier to wildlife movement throughout the landscape.

The proposed “turbine fence” barrier is further strengthened by the “agricultural clearing” that has occurred along the ridgeline removing many hollow bearing trees and thus the proposed siting of WTGs adds a cumulative barrier effect to wildlife movement.

The proponent has demonstrated acceptance that barrier effects to wildlife and aerial operations from turbines are a problem, hence WTG41 removal. When a simple layman studies an aerial image one can't help but conclude the extensive native vegetation to the SW of the BHGMR is effectively sterilised by a cluster of 12 or more turbine barrier.

Appendix J Nov 2022 Table 1 & ERM WTG layout drawing indicate WTG 41 has been removed and 13 adjacent WTG appear to have locations “shuffled” along the ridgeline.

I return to my previous analogy of shuffling deck chairs on the Titanic.

The indicated shuffling appears to have resulted in some WTGs becoming closer to the BHGMR boundary is farcical.

WTGs 32,33,35,36,37,38,39,40,42,43,44,45,46,47 should all be removed.

The revised aviation obstacle lighting with low intensity lighting continues to be an unsatisfactory impact, particularly to neighbours within 5km of lighting. The proponent hides behind their expert Aviation consultant report analysis which is adamant, obstacle lighting is not required! Despite knowing full well that CASA will recommend obstacle lighting “Don't blame us, it's CASA's fault” was an ENGIE representative's response. If these consultants' reports are credible then obstacle lighting should not be imposed on our community.

### **Transport Impacts/ Road Modifications:**

During 2021 I attended a video call with the proponent regarding the previous Morrisons Gap Road realignment and retaining wall construction proposal. It was presented to us that after extensive investigation and consideration that the Morrisons Gap Road transport route would result in the lowest biodiversity and traffic impacts than traversing a Crawney Rd or Head of

Peel Rd route. The proponent was adamant that the Morrisons Gap Road option was the only option.

Yet, I find myself now being informed that there are at least three route options off Crawney Road and are purported to now achieve far lower biodiversity loss and lower traffic impacts as a result.

At the risk of gloating and saying “ I told you so” I still cannot help but think we are shuffling deck chairs again.

Given the proponents' historical flip flopping on this issue I have no confidence in the implied low disturbance that is currently proposed to some realignment of Morrisons Gap Road. Our previous objection citing the destruction of road character and roadside vegetation is still valid and does not support the use of Morrisons Gap Road for the transport route of Verden Road Quarry material in particular.

Further to the above concern, is that the proposed road modifications will enable traffic to traverse the corner adjacent Lot 9 DP249183 at greater speeds than currently and the road users accessing and egressing the property entry will be subject to an unacceptable risk of vehicle collision.

I therefore continue to object to any road modifications to Morrisons Gap Road.

#### **Visual landscape scaring:**

Despite copious amounts of reports and pretty dioramas, unfortunately nothing of any substance has alleviated my concerns about our natural mountain range being transformed into an industrialised theme park. I have visited at least a dozen wind farms in the Australian landscape in the last 4 yrs to try and condition myself to their presence. Instead of reassurance and acceptance I have become ever more objectionable to their presence in our landscape.

The urban dwelling visual consultants through their reports have continued to insist 230 mtr high industrial structures imposed on our ridgelines are complementary to the landscape and we are being unreasonable in objecting to the proposed visual impacts.

I, and many other community members say that is simply BS (*If you describe something as BS you are saying that is nonsense and completely untrue. BS is an abbreviation for bullshit. Collins Dictionary*)

## **Proponents inflated self importance for the greater good and failed social licence:**

Wind power generation is a noble pursuit in an appropriate location. Predictably, a wind farm developer will claim anywhere a sound wind resource is located is a suitable generation site. However, WTGs 100m from a Nationally significant nature reserve is akin to a brothel next to a kindergarten. It is not a sympathetic or compatible land use.

There are many good reasons why offshore wind is now the leading area for growth in overseas markets and now fortunately for Australia, our regulatory framework is encouraging development of projects in what is in my opinion the best hosting option for wind turbines.

All of the significant impacts that the HoGWF has presented could be avoided if the generation site was located offshore. An 83.5 metre offset, from a Nationally significant Nature Reserve is NOT a sympathetic development site. When onshore hosting for turbines was the only option, then I concede land based was worthy of consideration, this is no longer the case.

All wind farms have had objections and the Hills of Gold Wind Farm is at the top of the list. Disappointingly, throughout the proponents submissions, newsletters and media statements the proponent appears to show contempt to anyone who objects to their proposals and implies the reason the assessment process has become so protracted is because of the obstructionist objectors!

Perhaps, had the proponent undertaken adequate due diligence and site suitability investigation for a suitable wind farm site we would all be enjoying life free of undue stress.

Although the proposed HoGWF amendments were significant enough to trigger a new public exhibition period, why has the proponent not provided an updated capital works report? As a member of the construction industry I can attest that construction costs have increased significantly since the original EIS was submitted and supply chains continue to be disrupted. I am aware of many projects that are now being cancelled, deferred or scaled back due to increased construction costs. If the proponent cannot demonstrate the project is viable and constructable why should the community have to endure the assessment process any longer?

Despite the proponent massaging the facts in an attempt to gain a social licence, facts are facts. The majority of the community oppose this project.

The bottom line is, this wind farm is not critical to the greater good of humanity and should be refused consent.