

In January 2021 I wrote a submission to the Department of Planning, Industry Environment detailing my objection to the Hills of Gold Wind Farm (HoGWF) state significant development application. It's now December 2022, the proponents have spent almost two years working to address concerns raised in objections to the development and have now submitted an Amendment to their application.

I have read through the Amendment Report (no. 2) and its numerous appendixes. However, the proponents' attempts to address the concerns raised seem half-hearted at best, and the report doesn't reflect the actual situation or reflect the fact that there is no majority support for the project. This was further reinforced when the proponents refused to hold a public meeting to present the amendments to the community. Instead, the community were left to organise their own public meeting communicate the findings

No majority Support

There are many instances where the Amendment Report (no. 2) makes mention of the importance of consulting with the local community to address key concerns raised, only to be summarised as being a necessary annoyance on page 43. The report claims that there is strong support for the project, that only a minority of community members remain opposed to the project and who do not want a wind farm development in the region. Evidence exists to the contrary and can be found in the number of strong objections raised, which are readily available to the public. There is NO majority support for the project, locally or broadly. At this point in time, the project has failed to obtain a Social Licence.

Not required for the greater good

During an onsite meeting on our property, the proponent stated the development is necessary to fill the energy demand gap when Liddell Power station stops operating, it's for the greater good to help switch to renewable energy. In the Australian Energy Market Operators' Electricity Statement of Opportunities, it says there is more than enough capacity in the pipeline of committed renewable energy generation projects to meet Australia's electricity needs. The list of projects identified as being 'committed' to providing more than enough renewable energy does not include the HoGWF as a 'committed' project (link to list is provided below). The proposed HoGWF is not essential for the greater good.

The location of the development is questionable also in that it is not located within an area touted to be a renewable energy zone, the closest being the New England Renewable Energy Zone. The renewable energy zones (REZ) have been designed to share the costs & concentrate clean energy generation development in areas where there's available resources and suitable locations. The map from alt energy's website shown below as Map 1 shows the fish out of water position of the development in context to the many other wind farm developments in the pipeline. Map 2 below shows the proposed New England REZ, which indicates that almost all wind farm developments in the pipeline are within the zone, with the exception of the HoGWF.

<insert Map of projects>

<insert map of REZ>

Local quarry doesn't change local traffic volumes

The option of the Verden Road Quarry to source quarry material locally is being promoted as an improvement to the project, but for who? Yes, it will contribute to the viability of the project, but the routes shown in the Amendment Report, Figure 6.1. does not remove the impact the trucks will have on local roads, it is merely reducing the impact on the broader road network & transport costs to the proponent.

The concerns raised in my initial objection regarding traffic along Morrisons Gap Road are far from being eased. Using the numbers from the Amendment Report (no. 2) which states 65% of the 14 truck trips per hour equates to approximately 1 truck every 6 minutes along Morrisons Gap Road. The letter from TTPP (ref: 18289) estimates that 65% of the construction traffic (excluding the OSOM vehicles prior to being packed down) will use Morrisons Gap Road. They estimate a total of 311 traffic movements per day in total which equates to 202.15 vehicles per day (assumed operation hours of 7am to 6pm) and approximately 18.3 per hour (3.3 per minute) along Morrisons Gap Road.

The cumulative impact of the quarry trucks together with the other types of heavy & light vehicles proposed to use Morrisons Gap Road will still have devastating impacts to the amenity and safety of the road over the extensive construction period. When put in the context of what the current traffic movements are, the alleged "improvement" of traffic reduction does not remove the irreversible destructive impacts on the variety of life along Barry & Morrisons Gap Roads, it is slightly lessening the destruction that will be caused. Even though the retaining walls along Morrisons Gap Road have been removed from the proposal, road widening and vegetation removal is still on the cards. There is next to no detail of the extent of that work.

Access to Site

The Amendment Report (no. 2) outlines that the Barry Road access to Site is no longer proposed for the OSOM vehicles. Three other options using the Crawney Road have been proposed, labelled Option A, B & C. All 3 options transverse through Nundle.

The proponents lack of concern for protecting the natural environment is demonstrated in their seeking permission to disturb/destroy a known habitat of the endangered Booroolong Frog to construct a causeway for an access road known as Option B. It appears that all three options present negative biodiversity impacts (Table 6-2 Options Analysis for Western Site Access from Crawney Road). The Rex J Andrews Route Study (Rev 9) determines these three options as routes requiring 'Significant amounts of Modification' and includes the possible removal and replacement of bridges. More proof of the proposed negative impacts to biodiversity and demonstration that the site is unsuitable due to access constraints.

The amendment report mentions that it is hoped the project will bring new families to the area as a key benefit of the development. The access options mentioned above include routes that require the removal of buildings which happen to be habitable dwellings. With limited land available to establish these dwelling elsewhere in or near the Villages, the removal of the dwellings adds to the already constrained supply of housing available to anyone wishing to live and work in the area.

Biodiversity

As a long-time local resident, I still strongly believe that the development will have irreversible negative impacts on the local biodiversity. The Biodiversity Development Assessment Report by Biosis (26.10.22) states significant impacts to EPBC Act listed Koala & Spotted-tailed Quoll are

considered likely to occur because of the Project. Despite efforts made to reduce impacts, the residual impacts to both species have been conservatively considered significant. The species will require direct offsets in accordance with the EPBC Act Offsets Policy, secured via the NSW BOS, all mentioned on page 23 of the report.

A recent report has been published by the Audit Office of NSW: “Effectiveness of the Biodiversity Offsets Scheme” August 2022 (link provided below). The audit explored the effectiveness of the scheme to compensate for the loss of biodiversity due to development. The report is quite damning in its Key Findings which include the following:

“A market-based approach to biodiversity offsetting is central to the Scheme’s operation but credit supply is lacking and poorly matched to growing demand.”

“These factors create a risk that biodiversity gains made through the Scheme will not be sufficient to offset losses resulting from development...”

In its conclusion, the following is stated:

“The Scheme has been in place for five years, but the biodiversity credit market is not well developed. Most credit types have never been traded. Also, according to DPE data, around 90% of demand cannot be matched to credit supply – and there is likely to be a substantial credit undersupply for at least seven endangered flora species, three endangered fauna species, and eight threatened ecological communities. Credit demand is projected to grow – especially in relation to the NSW Government’s \$112.7 billion four-year infrastructure pipeline.”

For these reasons I have absolutely no confidence in the use of the Scheme as a measure to mitigate the impacts of the development will have on Koala’s & Spotted-tailed Quolls as Biosis predicts.

Summary

The legislated process of issuing development consent for this state significant development, required by the EP&A Act 1979 requires evaluation of the matters listed in clause 4.15 Evaluation which include the following:

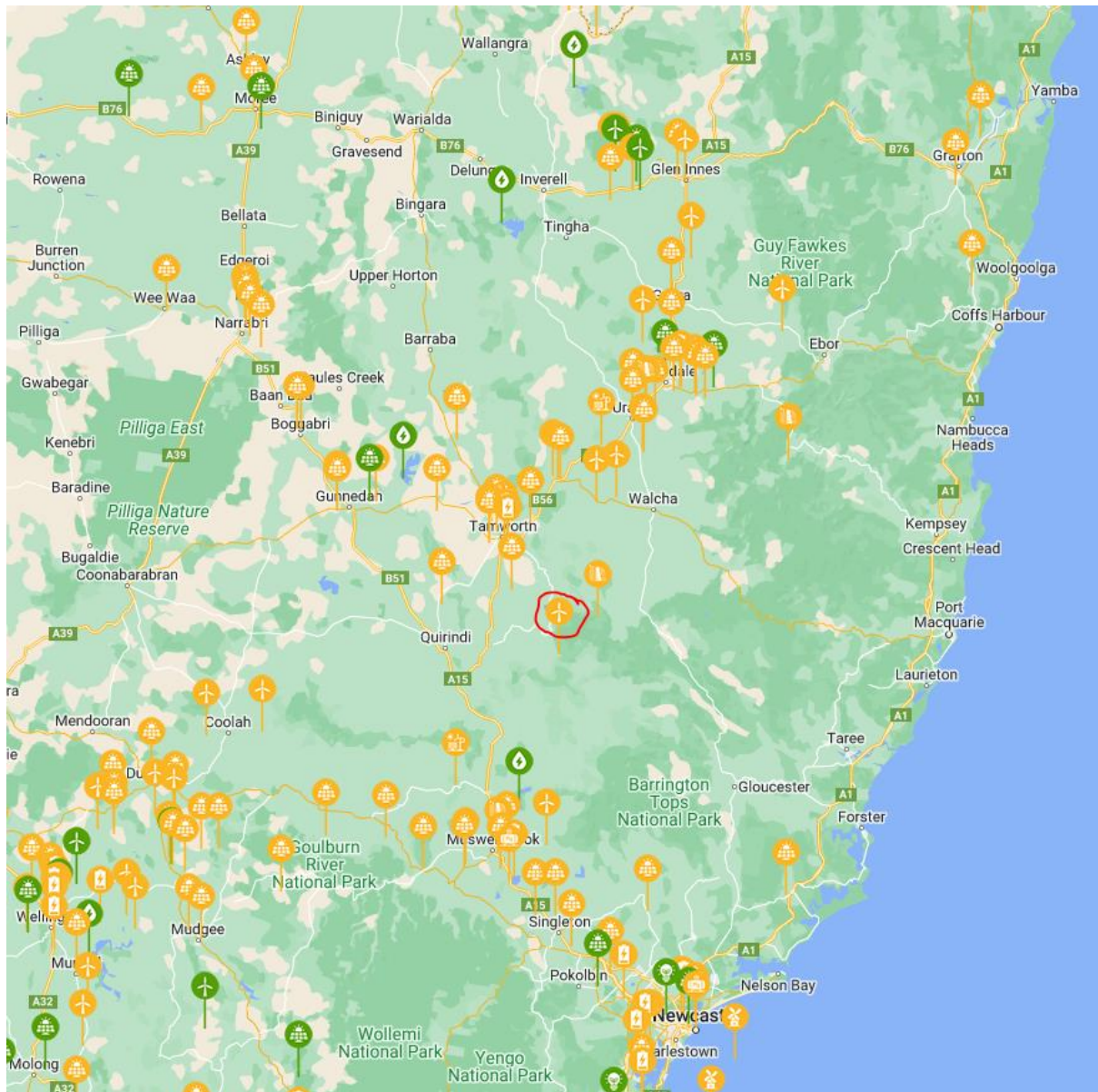
- (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*
- (c) the suitability of the site for the development,*
- (d) any submissions made in accordance with this Act or the regulations,*
- (e) the public interest*

From the select few matters of concern I have raised in this submission, I cannot see how the impacts described can be deemed as being acceptable in addressing the matters of evaluation. The likely impacts include:

1. Irreversible damage to populations of endangered species.
2. Further division within a community already divided as an outcome of the Project.
3. No majority support from the local community.
4. The development is not required to meet Australia’s renewable energy needs.
5. The Project has failed to obtain a Social Licence.

I therefore, still object to the issuing of consent for the Hills of Gold Wind Farm development.

Map 1 – Alt Energy’s renewable energy projects in the pipeline



The Hills of Gold wind farm, shown above circled in red, even looks out of place when shown in context of the proposed developments in the pipeline.

LINK - Alt Energy website: <https://altenergy.com.au/> accessed 09.12.2022

Map 2 – New England REZ



Link to REZ map: <https://www.energyco.nsw.gov.au/ne-rez>

LINK - Australian Energy Market Operator, National Electricity Market forecast spreadsheet link which lists 'committed projects' (accessed 11.12.2022):

https://aemo.com.au/-/media/files/electricity/nem/planning_and_forecasting/generation_information/2022/nem-generation-information-november-2022.xlsx?la=en

LINK - NSW Audit Office, "Effectiveness of the Biodiversity Offsets Scheme" (accessed 12.12.2022):

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