

## OBJECTION TO THE HILLS OF GOLD WIND FARM APPLICATION NO. SSD 9679



Detailed drawings of the intersection modifications and proposed private road through the lands of The Peel Inn were not communicated in the newsletters, nor displayed at Engie's community information hub. The newsletter briefly stated "the new proposed route is now via Crawney Road".

The 3D model displayed at the community information hub does not communicate any meaningful Information. No labels of locations are provided, no roads marked, no villages of Nundle or Hanging Rock. It does not allow an understanding of the scale or the siting of the project.

## From bad to worse

If previous location of the substation, battery bank and construction compound left surrounding residents unhappy due to the highly elevated location on the top of the prominent mountain and in the headwaters of the Peel river, fear not, the proponents have come up with an even better idea, to locate all these items on the hillside.

Upon reviewing the supplied images of the typical BESS installation, typical O&M Facility and typical Substation, I have realised that typically, they don't get perched on the side of the mountain.

If the previous proposal of the Devil's Elbow bypass seemed like a nonsense, we now have the **Nundle loop** (clearly designed to give everyone a first row seat to look at the blades) and the **Nundle bypass** (which bypasses nothing apart from the pub).

And to add more excitement, the quarry turning out 500,000 tonnes of gravel per year, associated blasting and over a hundred trucks through the village of Hanging Rock, the sleepy village which usually doesn't get any heavy traffic at all.

The visual impact of the proposed quarry expansion in the State Forest has been inadequately assessed (one photograph taken from behind a tree) and some properties in Hanging Rock will now be additionally impacted by this. Two properties impacted by the quarry and associated traffic which are located on Forest Way are **not identified**.

## Invisible dwellings

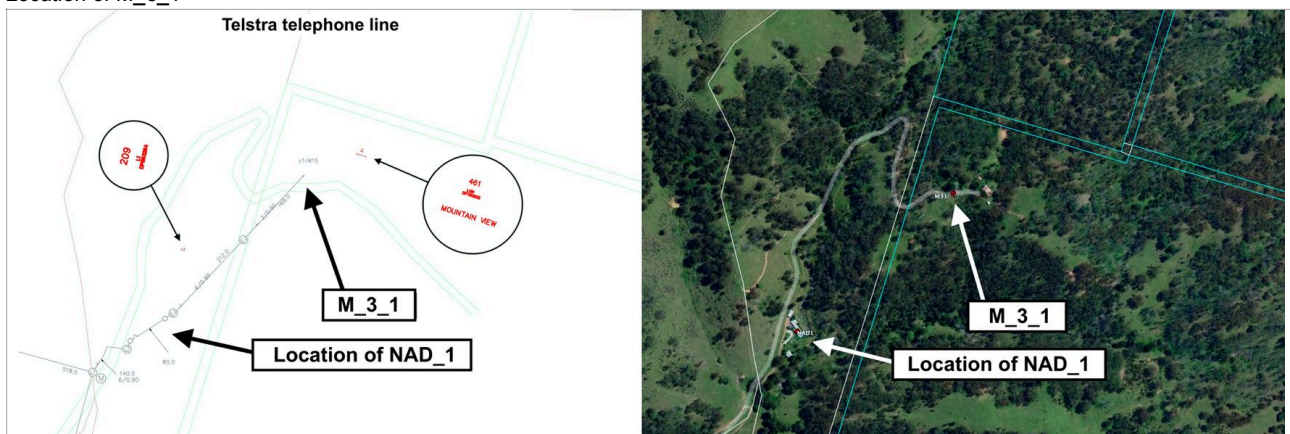
Engie on site selection: "A key early consideration in site selection for the Project was the excellence of the wind resource in the region combined with the relatively low number of existing residential dwellings within 5 km of the Project. There are 56 existing dwellings within 5 km (35 of which are non-associated dwellings). Of these, there are 10 existing dwellings within 2 km (of which six are non-associated dwellings). Most of these dwellings are located on Morrisons Gap Road and Barry Road, and are generally screened from the Project by topography and vegetation."

The proponents once again failed to identify all dwellings within 5 km of the project. And those they have identified (64 in total), they can't seem to add up.  
In summary, there are 73 dwellings within 5 kms of the project area (not counting transmission line and access roads), of which 23 dwellings have signed agreements and 50 dwellings where agreements have not been signed.

**A missed dwelling M\_3\_1** (my identification, M - Missed, 3 - within 3 kms, 1 - dwelling ID ).  
Location: Easting 321285, Northing 6496516

An old established house located on a property called "Mountain View" approximately 2.6 kms from the nearest turbine. The aged owner of the property is overseas and is possibly unaware of the proposed wind farm. The image below shows a Telstra telephone line connected to the house. I anticipate the proponents will claim "it's just a shed"

Location of M\_3\_1



Below is a list of other properties within 5 kms (as measured from the nearest turbine) which proponents have left out completely.

ID	Coordinates	
M_5_1	318176 6495553	Old church converted into weekender on a half acre block. The property has frontage to Timor Crawney Rd and is surrounded on three sides by Chris Eagle's property. The old church is a separate property to Eagle's holdings and under a different ownership. It was once permanently occupied but used as a weekender by the new owners. There is a clear view of the proposed wind farm site from this location. Right on 5km mark from the project.
M_5_2	323357 6493144	Property located at 329 Sargents Gap Rd. An established farm with established house. There is a likely visual impact from this location.
M_5_4	328218 6514465	An existing property with established house in Hanging Rock. Sits on an elevated spot. Might or might not be visually impacted. Impacted by traffic.
M_5_5	328378 6514591	An existing property with established house in the village of Hanging Rock. Impacted by traffic.
M_5_6	328337 6514600	An existing property with established house in Hanging Rock. Impacted by traffic.
M_5_7	328438 6514707	An existing property with established house in Hanging Rock. Heavily impacted by traffic.
M_5_8	328566 6514758	An existing property with established house in Hanging Rock in an elevated location. Impacted by traffic and possibly visually.
NAS_15	315798 6496733	Previously identified as NAS_15 (Non Associated Structure), this two bedroom farm house has now been left out completely. This property has recently been sold and the following description of the dwelling was given by the agent: <b>"Improvements include a 2 bedroom farm cottage with reverse cycle air conditioning, wood fire heating, and ceiling fans. The cottage has an open plan living area, 2 bedrooms, kitchen, bathroom with separate WC."</b>



Appendix A provides a complete list of the dwellings within 5 kilometres.



## How steep is too steep?

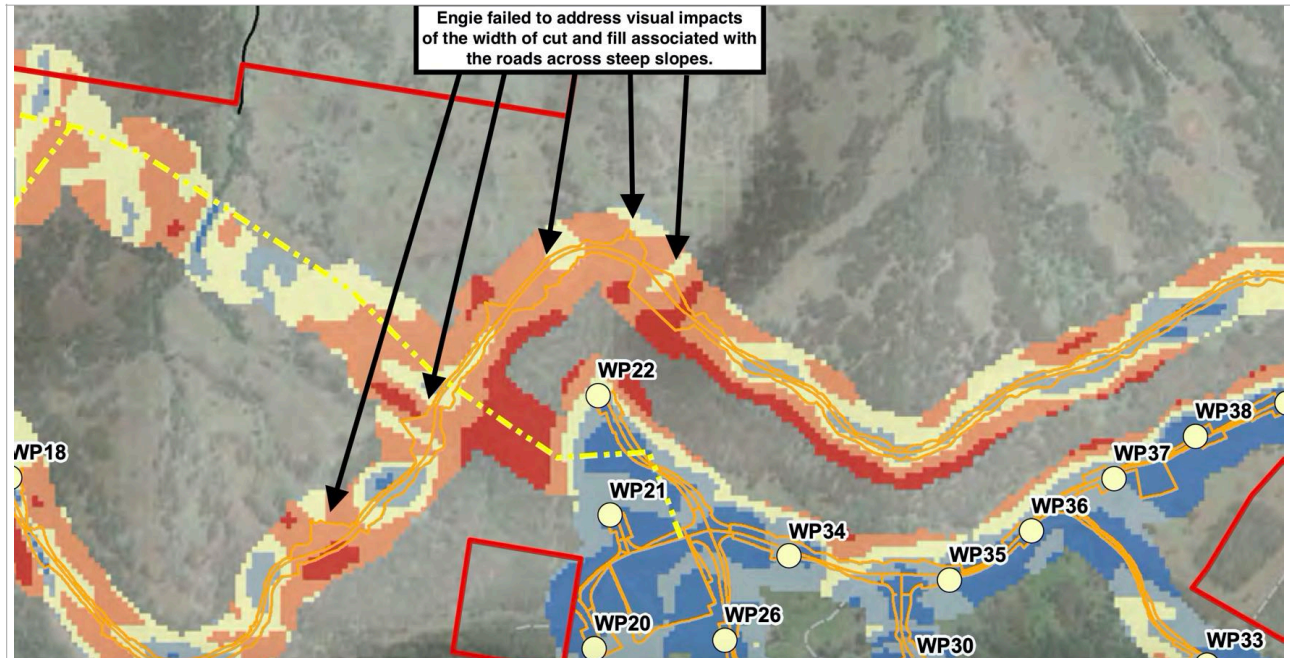
## Western Connector road is proposed to climb up the 59% slope

In order to create a road 6-8 meters wide, a significant cut and fill is required. Chasing the batter up the slope and down into the valley will result in the total width of the road up to 50-60 meters and subsequently a wide environmental footprint, and a tremendous visual impact. Is it even possible?



## Transverse Track

A diagram was provided indicating the necessity to cut through ridges over 50% steep and fill gullies. One of these gullies is a second order stream - Talbots creek. Again, the visual impact of all this mess was never shown.





# Collapsing roads

## 1) The blade transport route:

The bridge over Oakenville Creek on Old Hanging Rock Road forms is a part of the blade transport route - the Nundle loop. This bridge did not feature in the Rex Andrews Route assessment report, nor did the cutting through the mountain immediately following the bridge.

*The bridge over Oakenville Creek on Old Hanging Rock road, Nundle*



## 2) The general construction traffic route via Hanging Rock:

The collapsed section of the Barry Road within Hanging Rock village, which forms part of the heavy and light construction route.

*Barry road in Hanging Rock*





### 3) The light vehicle route:

A collapsing edge of the Crawney Road near Crawney National Park. This route is likely to be taken by the light vehicle traffic coming from the Hunter region and using the Timor Crawney Road as a shortcut to the project site.

*Crawney road near Crawney Pass, Southern side of the range.*



## They didn't read our submissions

**No efforts were made to reduce the visual impacts to the community or surrounding non associated land owners.**

The removal of one turbine was dictated by the biodiversity issues, rather than the sympathy for the community surrounding the project or adjacent non associated dwellings.

A number of other turbines were shifted a small distance from their original locations and some have moved to HIGHER ground, thus increasing visual impact.

The visual impacts of the Transverse Track and the new proposed Western Connector Roads are not addressed. The visual impact of the proposed roads and hardstands within the project footprint is not addressed.

The visual impact of the new proposed private road through The Peel Inn lands and proposed intersection modifications is not addressed.

The visual impact of the beefed up power lines has been assessed and the impact is INCREASED.

The visual impact of the new optional location of the BESS, substation and O&M building (and associated night lighting) perched on the shelf on the side of the mountain is not addressed.

Turbines impacting on non associated properties are not removed.

Turbines impacting Ben Halls Gap Nature Reserve are not removed.

I am glad they finally found the wombats, after four and the half years of looking. The mitigation measure? Excavate and relocate.

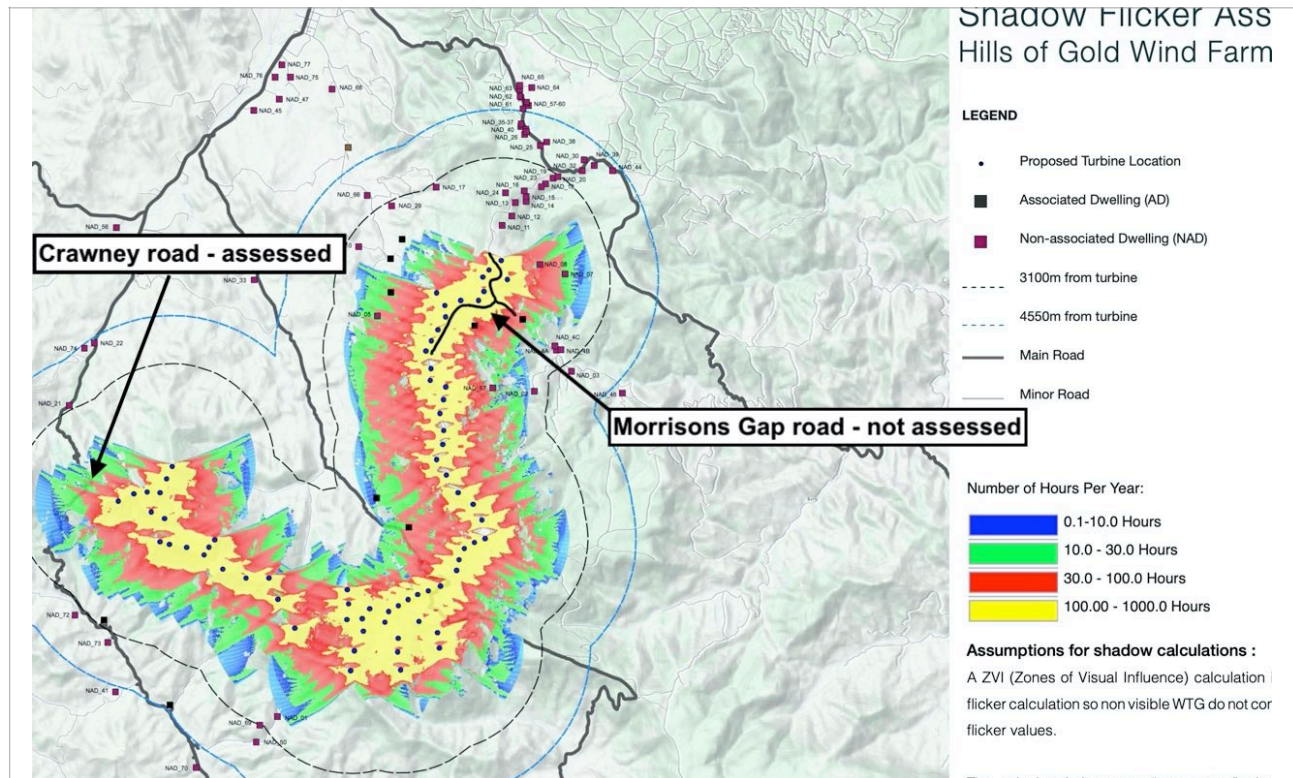


## The “duck and weave” on Morrisons gap road

Residents and visitors using Morrisons Gap and Shearers roads will have to drive through the construction site and under turbines to get to their destination. The wind farm construction tracks are overlapping and crossing a public road and one of the turbines, WTG 70, overhangs the road with the blades.

Shadow flicker, blade glint, ice throw, blade throw, tower collapse are not addressed.

On the other hand, a section of Crawney Road on the western end of the project was assessed and happily declared “safe”



## People don't need driveways

The proposed turn from the Old Hanging Rock Road to the Happy Valley Road presents a number of challenges:

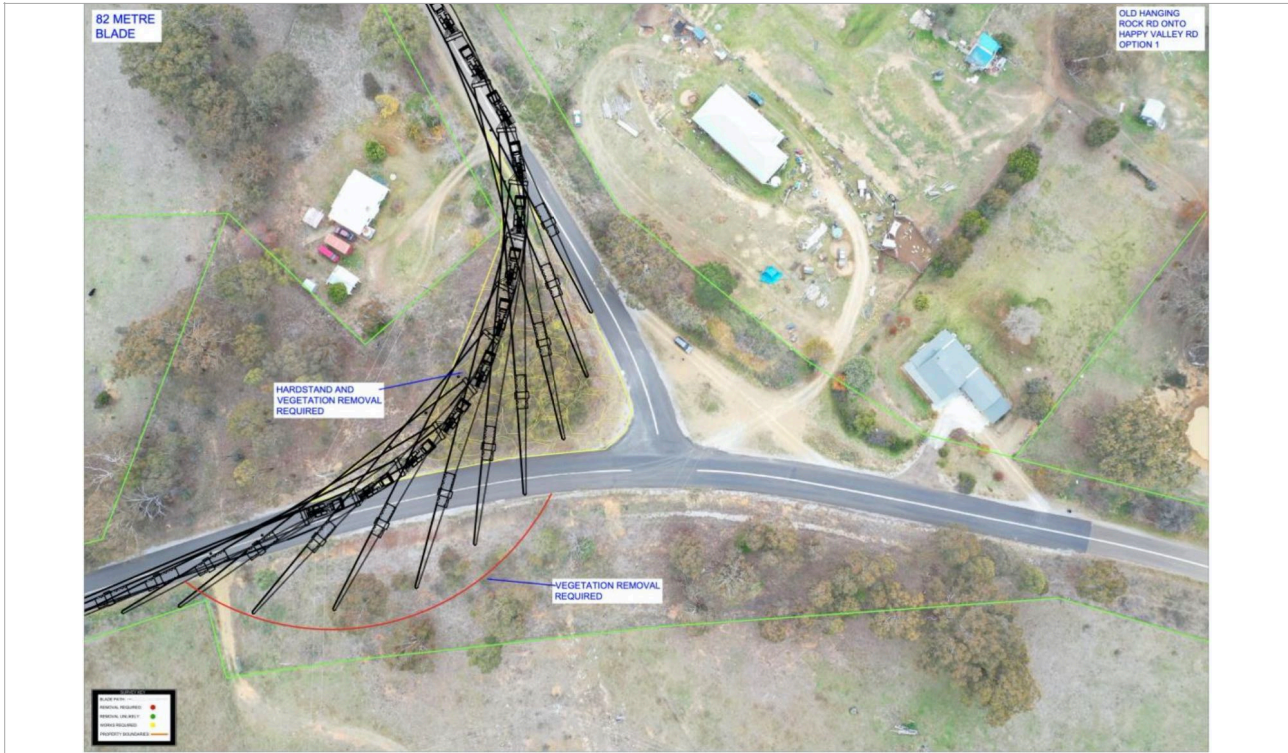
Filling in the corner, the retaining wall, and the removal of trees on the property inside the turn.

The removal of vegetation (and the hill the vegetation stands on, which is conveniently omitted) on the outside of the turn.

To facilitate the swing of the blade tips, my steep-ish driveway will need to be undercut and I might find myself under home arrest.



### Happy Valley turn manoeuvre



And if the first option wasn't silly enough, there is always the plan B. We can reverse into the Happy Valley road... beep..beep...beep..

To facilitate this amazing manoeuvre, a fill is required on the north eastern side of the intersection and a retaining wall across my neighbour's driveway. When I called him with the existing news he couldn't understand what I was talking about. So he probably won't be making a submission, he thought I was joking.

### Happy Valley reversal manoeuvre





# Asbestos dust anyone?

The proximity of the proposed footprint of the expanded Verden Road quarry to the naturally occurring asbestos area, as identified on SEED database, warrants further investigation. The heavy traffic through Hanging Rock may be a health risk if gravel containing asbestos is transported through the village, or the extra traffic generates enough disturbance as the traffic crosses the belt of asbestos within the village.

A lesser risk exists for Nundle with 35% of the gravel transport proposed through this route.

## 3.3.9 Optional Verden Road Quarry Expansion

One of the proposed amendments to the Project is the optional expansion of a quarry 9 km north of WTG 69 within the Nundle State Forest.

Verden Road Quarry is located at Lot 254 DP755324 and Lot 6711 of DP1204174, which is Crown land managed by the Forestry Corporation of NSW (FCNSW).

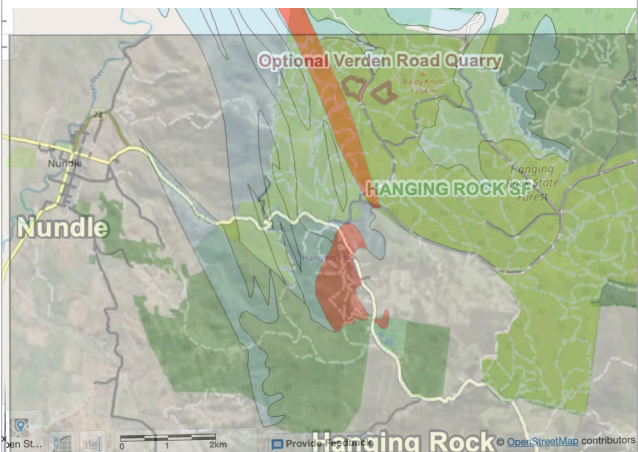
The quarry site currently supports an existing, small (< 30,000 tonnes per annum) FCNSW quarry operation, which utilises the material for upgrade and maintenance of roads and tracks within the Hanging Rock State Forest.

It is proposed to expand the quarry to supply materials to the Project. The proposed quarry would extract up to 500,000 tonnes per annum.

It is estimated that the Project may need approximately 700,000 – 800,000 tonnes of quarry materials in total. Key features of the proposed expansion are summarised as follows:

- Quarry operations would be confined to Lot 131 DP754099 and Lot 132 DP754099;
- Two areas for quarrying activities are identified as follows:
  - The 'western operations area', which is focussed on the existing FCNSW quarry operations area. This site has an area of approximately 13.2 ha, which includes the extraction pit, processing and stockpiling areas, overburden /topsoil emplacement areas and surface water management structures. This would be the primary area for the production of quarry materials; and
  - The 'eastern operations area', located on the hill immediately to the east of the 'western quarry'. This site has an area of approximately 9.9 ha, which includes the extraction pit, processing and stockpiling areas, overburden /topsoil emplacement areas and surface water management structures. This area would only be used should the quarry materials demand from the Project exceed anticipated extraction from the western extraction area (either in total demand quantity and/or rate of demand). To summarise, it would provide a back-up option for the production of quarry materials if required.

Optional Verden Road Quarry in relation to the asbestos belt (red)



## Category 2 land

A part of the project, specifically the Western Connector Track and the Transverse Track, are located on category 2 Vulnerable regulated land and small section on category 2 Sensitive regulated land.

Rural land in NSW is categorised into three main categories:

- Category 1 (exempt land),
- Category 2 (regulated land)
- excluded land

The native vegetation regulatory map provides the relevant information.

Local Land Services Act 2013 restricts the width of the clearing within the Category 2 regulated land to 6 meters ( as compared to 30 meters for exempt land)

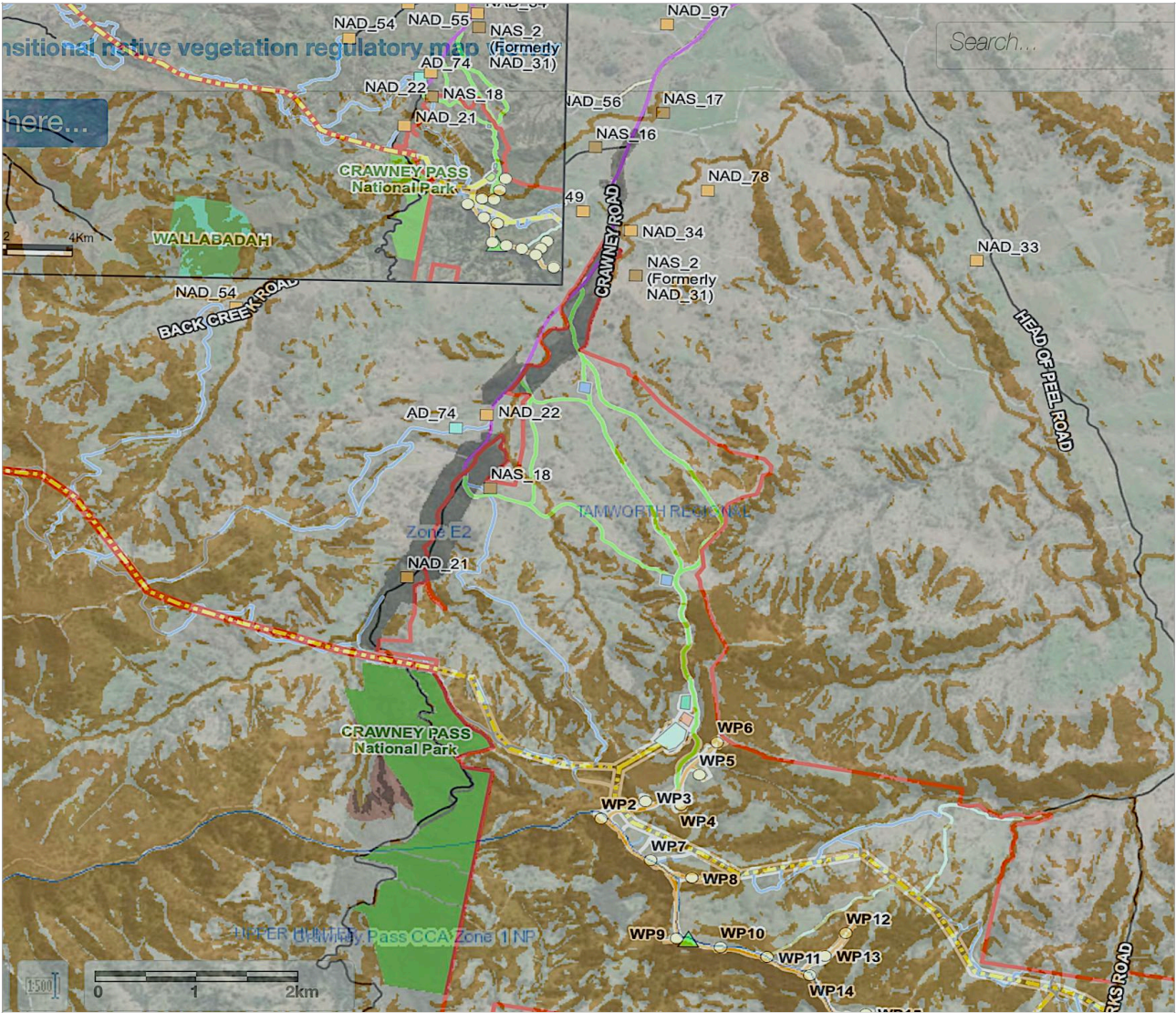
Although this is applicable to agricultural activities the land owner can undertake on his land, If this land is worth protecting for agriculture, it is worth protecting for all land use.



An overlay of the Eastern part of the project footprint over the category 2 Vulnerable and Sensitive regulated land



An overlay of the Western part of the project footprint over the category 2 Vulnerable and Sensitive regulated land





# Landslides

Another landslide has occurred recently, this time on the airstrip paddock of the main host, underneath the private quarry he has created to improve his farm tracks.. oh, I mean wind farm roads.

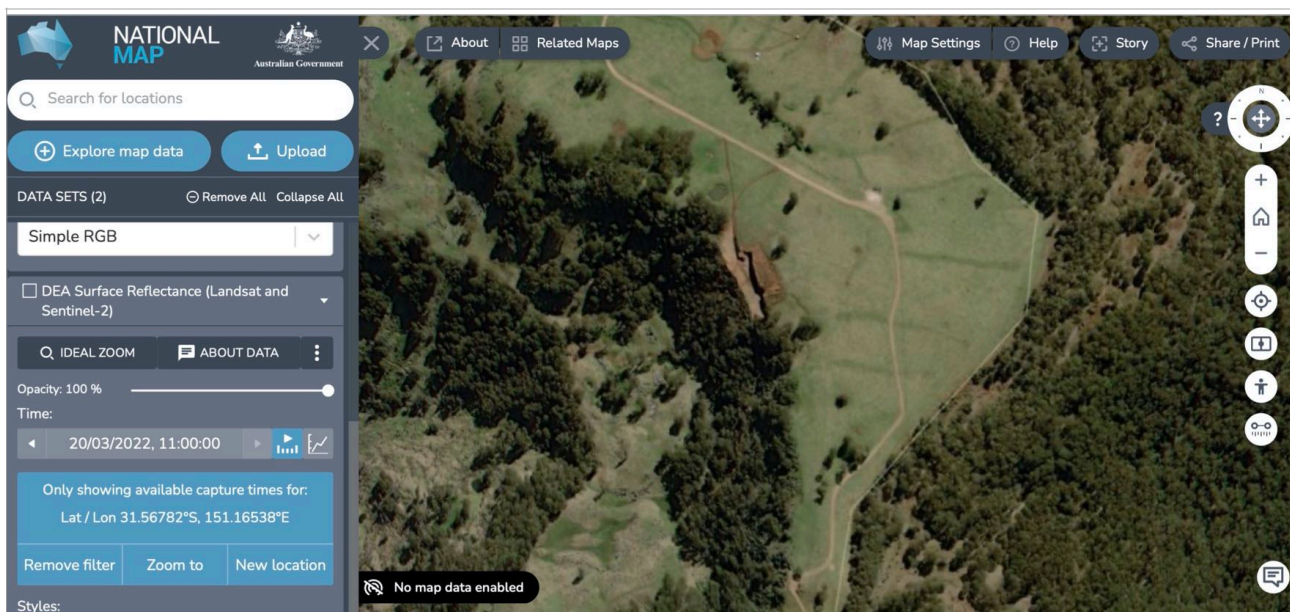
It is located near proposed turbine 55 and temporary batching plant 1, and in the vicinity of turbines 56 and 54.

This combined image below shows the proximity of the private quarry to the proposed wind farm infrastructure.

*An overlay of Google Earth screenshot with three turbines and batching plant and the satellite base image.*

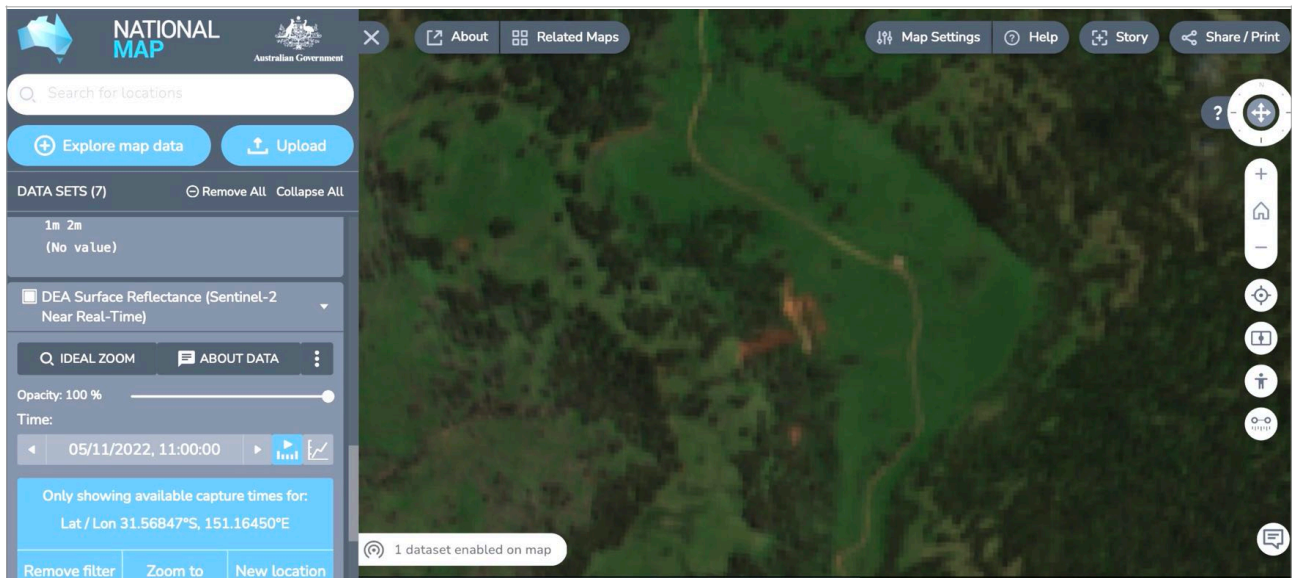


The quarry was cut on the edge of the paddock, perched above the 66% slope of heavily timbered hillside.



The image below shows a large landslide which occurred some time between 16th of October and 5th of November ( this area was under cloud in the Satellite images taken on 21.10.22, 26.10.22 and 31.10.22). It is possible that the landslide happened during the intense rainfall on the 1st of November.

**The length of the landslide measures approximately 140 meters long.**



*A view of the landslide from the ground*



**This shows once again the instability of the soil and demonstrates the risk of placing wind farm infrastructure on or near slopes.**



# Ben Halls Gap Nature Reserve

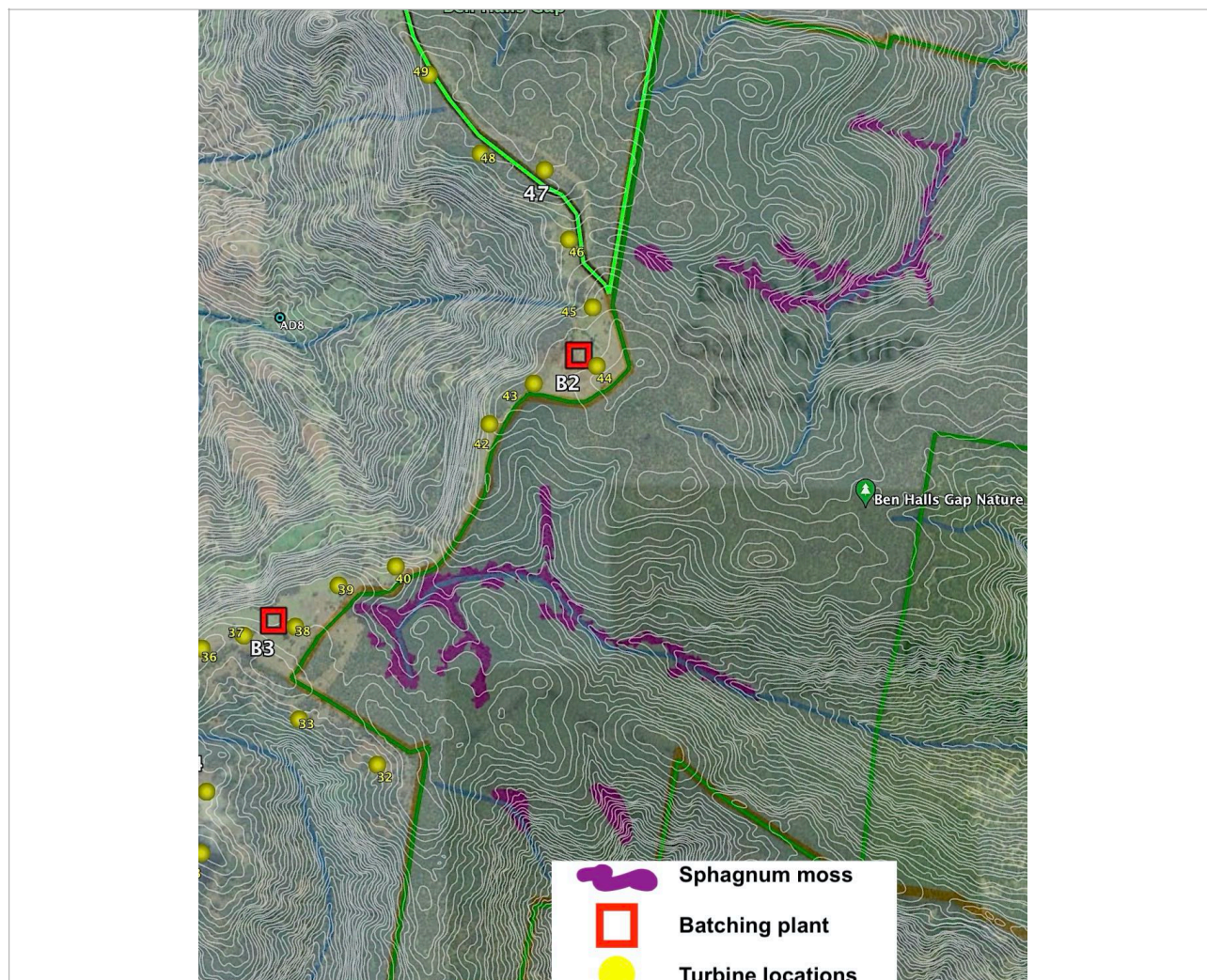
Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest is now listed as Critically Endangered, effective 5th October 2022.

The location of Hills of Gold Wind Farm just over 135 m outside the closest extent of the development footprint is too great a risk for the ongoing conservation management of this threatened ecological community.

Back in my country of birth, sphagnum moss is just something we walk on. But here in Australia, Sphagnum Moss Cool Temperate Rainforest has a very restricted geographic distribution, and it is likely that the action of a threatening process could cause it to be lost in the immediate future.

In addition to the turbine and road locations, there are two concrete batching plants proposed on the boundary of the Ben Halls Gap Nature Reserve. Contour lines show the batching plants are proposed to be located on higher ground above the areas occupied by the moss. There is risk of run off from the concrete plants into the creeks feeding the moss area.

The wind farm would pose a risk to the threatened ecological community for the life of the project, 25-35 years, from introduced weeds and pathogens, sedimentation, and fire regimes that cause decline in biodiversity. This supports the NPWS request to remove wind turbines on the boundary of Ben Halls Gap Nature Reserve. It also supports removal of wind turbines at the southern boundary of Ben Halls Gap State Forest. Given the sensitivity of the threatened ecological community and the extensive soil disturbance proposed by the wind farm construction, the Critically Endangered listing supports rejection of the wind farm.





## Appendix A

	Dwelling	Status	Easting	Northing	Nearest WTG	Distance	Comments
1	DAD_1	Uninvolved	325891	6506836	WP57	330	
2	AD_5	Host	326945	6507944	WP65	764.77	
3	AD_4	Involved	327384	6510895	WP69	1028	
4	NAD_11	Uninvolved	327761	6510966	WP69	1064.93	
5	NAD_8	Uninvolved	328903	6509784	WP70	1081.08	
6	AD_11	Host	328384	6508125	WP70	1291.27	
7	AD_6	Host	324410	6508941	WP63	1377.58	
8	NAD_12	Uninvolved	328054	6511244	WP69	1379.53	
9	NAD_67	Uninvolved	327486	6506061	WP55	1422.33	
10	AD_13	Host	324403	6509959	WP63	1726.53	
11	NAS_1	Uninvolved	324044	6508877	WP63	1740	
12	NAD_7	Uninvolved	329663	6509501	WP70	1749.73	
13	AD_8	Host	324949	6501859	WP43	1792.2	
14	NAD_5	Uninvolved	324003	6508235	WP59	1795.09	
15	AD_12	Involved	328155	6511648	WP69	1795.94	
16	AD_10a	Uninvolved	324750	6510549	WP63	1925.03	misidentified
17	AD_14	Involved	328483	6511690	WP69	1937.92	
18	NAD_24	Uninvolved	327870	6511947	WP69	2049.97	
19	AD_15	Involved	328490	6511836	WP69	2075.97	
20	AD_3	Host	323978	6502750	WP50	2146.24	
21	NAD_16	Uninvolved	328430	6512004	WP69	2213.86	
22	NAD_4c	Uninvolved	329350	6507326	WP70	2461.49	
23	M_3_1(missed)	Uninvolved	321285	6496516	WP24	2588	
24	AD_23	Involved	328943	6512128	WP69	2532.2	
25	NAD_4a	Uninvolved	329397	6507209	WP70	2584.22	
26	NAD_4b	Uninvolved	329534	6507212	WP70	2662.42	
27	AD_2	Host	328733	6505963	WP55	2672.11	
28	NAD_18	Uninvolved	329077	6512215	WP69	2673.6	
29	DAD_3	Uninvolved	324167	6511232	WP63	2880	
30	AD_7	Host	315761	6499069	WP9	2901.65	
31	NAD_19	Uninvolved	329299	6512385	WP69	2933.91	
32	AD_17	Involved	325779	6512114	WP68	2954.08	
33	NAD_1	Uninvolved	320992	6496158	WP24	3020	
34	NAD_20	Uninvolved	329450	6512433	WP69	3056.64	
35	NAD_21	Uninvolved	314719	6505531	WP2	3320	
36	AD_9	Involved	329854	6506558	WP70	3379.6	
37	NAD_72	Uninvolved	314889	6499214	WP9	3386.48	
38	NAD_73	Uninvolved	315882	6498385	WP9	3423.05	
39	NAD-98	Uninvolved	314474	6499673	WP9	3451	
40	NAD_66	Uninvolved	323698	6511863	WP63	3603.24	
41	NAD_69	Uninvolved	320456	6495895	WP24	3620	
42	AD_32	Involved	330182	6512615	WP69	3652.55	
43	NAD_25	Uninvolved	328919	6513366	WP69	3660.68	
44	NAD_38	Uninvolved	329106	6513475	WP69	3826.84	
45	AD_26	Involved	328442	6513705	WP69	3868.41	
46	AD_30	Involved	330239	6512943	WP69	3938.38	
47	AD_40	Involved	328495	6513789	WP69	3960.83	



48	AD_50	Involved	320353	6495383	WP24	3980	
49	NAD_39	Uninvolved	330544	6512768	WP69	4011.98	
50	NAD_36	Uninvolved	328474	6513861	WP69	4027.63	
51	NAD_35	Uninvolved	328329	6513939	WP69	4080.8	
52	AD_37	Involved	328334	6514024	WP69	4165.64	
53	NAD_44	Uninvolved	331096	6512617	WP69	4319.31	
54	AD_10	Host	317746	6496505	WP15	4393.81	
55	NAD_22	Uninvolved	315473	6507424	WP6	4403.71	
56	AD_74	Involved	315171	6507263	WP6	4441.35	
57	M_5_4 missed	Uninvolved	328218	6514465	WP69	4590	
58	NAD_57	Uninvolved	328393	6514480	WP69	4625.39	
59	NAD_41	Uninvolved	316108	6496893	WP9	4728.57	
60	M_5_5 missed	Uninvolved	328378	6514591	WP69	4730	
61	M_5_6 missed	Uninvolved	328337	6514600	WP69	4730	
62	NAD_58	Uninvolved	328559	6514581	WP69	4751.27	
63	NAD_59	Uninvolved	328502	6514660	WP69	4819.73	
64	NAD_60	Uninvolved	328503	6514683	WP69	4842.6	
65	M_5_7 missed	Uninvolved	328438	6514707	WP69	4860	
66	NAD_48	Uninvolved	331392	6505905	WP70	4876.35	
67	M_5_8 missed	Uninvolved	328566	6514758	WP69	4920	
68	NAD_99	Uninvolved	317989	6495759	WP18	4940	
69	NAD_61	Uninvolved	328334	6514826	WP69	4960.69	
70	NAS_15 missed	Uninvolved	315798	6496733	WP9	4974	
71	NAD_62	Uninvolved	328300	6514859	WP69	4981	
72	M_5_2 missed	Uninvolved	323357	6493144	WP24	4982	
73	M_5_1 missed	Uninvolved	318176	6495553	WP18	5000	

This table demonstrates that there is a significant opposition to the Project within the 5km area. It is clearly illustrated by the lack of subscribers to the Neighbourhood agreements available to all residents within this area.