

Department of Planning, Industry and Environment
Attention Anthony Ko
Locked Bag 5022
PARRAMATTA NSW 2124

via email: anthony.Ko@planning.nsw.gov.au

Re: Hills of Gold Wind Farm - SSD 9679

Dear Anthony

I refer to the above development project for 98 wind turbines and associated infrastructure 8km south of Nundle, NSW. I wish to lodge my strong objection to this project on the grounds that the project is not suitable for the proposed location, will have unacceptable visual impacts given the proximity to non-associated residences and the nearby historic village that relies on tourism, and will have irreversible detrimental impacts on the local natural environment.

Visual impacts and amenity

- Residents will be able to view wind turbines from multiple vantage points. The ridge line is significantly high, taller than the Blue Mountains. It rings the villages of Nundle and Hanging Rock in a horseshoe shape, meaning that the turbines and associated infrastructure such as transmission lines and the scarring caused by massive land clearing, will be visible for many kilometres and from many view points.
- The project will not have isolated impacts to an unfortunate few properties, but to many hundreds of residents who live within the vicinity of the ridge line to the east and west, including the several hundred villagers in Nundle who will be viewing the turbines and associated infrastructure daily from multiple vantage points.
- The project area is a highly scenic area, adjoining state forests and state conservation areas (including Ben Halls Gap Nature Reserve, Nundle State Forest and Hanging Rock State Forest) and attracting visitors from all over NSW. This development will destroy the natural beauty of the landscape. The EIS has rated the "Scenic Quality" of the landscape as "moderate" with some areas "low moderate" and some areas "moderate high". I completely disagree with this rating. The landscape is of tremendous value to local residents and visitors. It cannot be "rated" by external consultants unfamiliar with the area, who have not chosen to live and work there, who have not grown up there and know the beauty found in so many aspects of the landscape. Visitors from all over NSW are attracted to Nundle for its natural beauty.
- The turbines will likely be required to have obstacle lighting where turbines exceed 150m in tip height. The proposed turbine height for the project is 230m to blade tip. The potential night lighting requirements for the project may include two flashing red obstacle lights per turbine to be lit. This will be a highly noticeable element in the night time landscape around Nundle and the surrounding areas that have exposure to views in the project area.
- This project has been developed for the wrong location. Most wind farms seem to be located in lower lying areas, away from towns and residents, the turbines themselves siting low in the landscape. This project will have the opposite effect, Nundle is a historic tourist town that relies on its isolation, beauty, and undisturbed landscape. Many thousands of visitors are attracted to

the area every year seeking rest and relaxation. Do not allow the industrialisation of this picturesque landscape. It cannot be justified.

Heritage

- In accordance with objectives of Clause 5.10 of the *Tamworth Local Environmental Plan 2012*, and the objectives of the *Environmental Planning and Assessment Act 1979*, development is required to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, setting and views. The Statement of Heritage Impact (SoHI) submitted with the application has only addressed the potential heritage impact to the physical fabric of one identified heritage item, the Black Snake Gold Mine (I134). The submitted SoHI has failed to address the major adverse impact of the development on the setting and curtilage of the multiple listed heritage items within the Nundle township and surrounds, including 16 additional places of heritage significance within the vicinity of the project area. This is a concerning omission from the SoHI and EIS and must be addressed due to the wide reaching impacts of the development, which extend far beyond the project area.
- No archaeological assessment has been undertaken to suitably address the detrimental impacts of the new road through a known archaeological site, the Black Snake Gold Mine, which would have significant impacts on the existing land form. An archaeological assessment must be provided, by a suitably qualified and independent archaeologist.
- In addition to the above, it is noted that although the village of Nundle is not an identified heritage conservation area under the TLEP 2010, it is considered that the town's historic buildings, many of which are subject to individual statutory protection, together provide a unique sense of place and harmony of scale. The existing setting of the town within the valley, surrounded by the Great Dividing Range, combined with its collection of 19th and early 20th century buildings, presents an environment of peaceful village life. The undisturbed landscape contributes enormously to the cultural landscape and its relative isolation, and is essential to the community's sense of place and the significance of the town. The construction of the proposed wind turbines, atop the existing ridgeline at 1200-1400 metres above sea level, together with associated infrastructure (including transmission lines, access tracks, underground and overhead electrical cabling, substation and clearing of vegetation), will have an extreme and irreversible detrimental impact on the character of the town.
- The SoHI has not addressed the impact of the proposed development on the setting and views within the town and its collection of numerous listed heritage buildings. It has also not addressed the direct adverse impacts of road upgrades and the detrimental effect the works will have on the character of the village and the surrounding landscape.
- Members of the community have provided a list of currently unlisted and unprotected heritage items to the proponent. The SoHI has not undertaken an assessment of heritage impact of these items as "none of these sites will be directly impacted by the proposed works" (ERM, page 57). However, the SoHI appears to have only considered the heritage impact of direct physical works to heritage items and has not addressed the irreversible changes to the curtilage and significant views to listed and unlisted heritage items. The SoHI has failed to address the significant indirect heritage impacts of the proposed development as a result of the detrimental impact on the significance of the surrounding cultural landscape to the heritage character of Nundle. The applicant claims to have consulted with the community regarding the impacts of this project yet dismisses the information they provide.

- The SoHI has noted that no social values assessment has been undertaken to inform the preparation of the assessment of heritage impact. In accordance with the Burra Charter the management of a place must be based on an understanding of its cultural significance. It is imperative that a social values assessment be undertaken before any determination is made that has the potential to have major adverse impacts on places of cultural significance to the local community.

Environmental impacts

- The majority of this proposal sits on Class 8 soils. Class 8 represents land that can only sustain very low impact landuses (eg nature conservation, scenic areas). The works as described in the EIS, involving significant excavation, land clearing, construction of new roads requiring reshaping the landscape, construction of transmission lines and the turbines themselves, cannot be considered to be 'low impact' and will certainly destabilise the slope.
- The project area is home to thirteen threatened terrestrial fauna species, including koalas. Following the terrible January bushfires of 2020, we must be protecting koala habitats at all costs given how much destruction occurred during that devastating period. A NSW parliamentary inquiry in 2020 found that koalas would be extinct in NSW by 2050 unless governments take urgent action to address habitat loss. This development will destroy many hectares of koala habitat, as well as many other threatened species.
- The project area is identified as bushfire prone land. The area is isolated, rugged, with difficult access for fire trucks. Turbines will undoubtedly provide additional hazards for firefighting helicopters/planes to access the area. A bushfire at the project area has the potential to be completely devastating and the project itself will create additional risks for bushfire during construction and ongoing operation.
- It is unacceptable that old growth trees, some plantings pre-dating European settlement and others over 100 years old, could be cut down for a renewables project. Some of the plantings are extremely rare due to the elevation and overlapping of bioregions. They cannot be offset or rehabilitated because they don't grow anywhere else. It is a unique location.
- The destruction of these old growth forests and habitat of threatened species cannot be justified for a relatively short term project - 20-30 years. This ridge line must be protected for future generations.
- The project area is located at the head of the Peel River system. The government cannot allow the industrialisation of this ridge and such great interference with the catchment at the head of Peel which will have significant flow on effects on the water supply to Tamworth and other cities/towns further along the catchment.

I urge you to recommend refusal of this harmful application. The proposed development is inconsistent with the following objects of the Environmental Planning and Assessment Act 1979 -

- a) The proposed development does **not** promote the social and economic welfare of the community and a better environment by the conservation of the state's natural resources. It will have a significant detrimental impact on the local environment with far reaching impacts to neighbouring local catchments. It is not in the community's interest to approve this application as demonstrated by the strong and consistent opposition to this project by the majority of locals.

- e) The proposed development does **not** protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats. The development will create unacceptable levels of land clearing, directly adjacent to state conservation areas and directly impacting on currently pristine wilderness that enormously contributes to the amenity of the local environment.
- f) The proposed development does **not** promote the sustainable management of built and cultural heritage. The Nundle township contains numerous listed heritage items protected under the Tamworth Local Environmental Plan 2012, as well as numerous unlisted places of heritage significance identified by the local community. The setting of the town, including its collection of heritage buildings from the 19th and 20th centuries, and its picturesque rural landscape are essential to the community's sense of place and the significance of the town. The cultural landscape has remained largely unchanged since the Gold Rush days and European settlement. The landscape is pristine and of great beauty, which draws many thousands of visitors each year and has attracted many people to make the village their permanent home. The industrialisation of this undisturbed landscape will have an extreme and irreversible impact on the heritage significance of the historic town, protected heritage items, their setting, and views.

I grew up at Nundle and write on behalf of my parents, who have lived at Nundle for 25 years. Their property and livelihood will be greatly affected by the proposal. Our family home will be ringed by wind turbines due to the shape and great height of the ridge line. The land clearing and associated infrastructure that will be required, including transmission lines, access tracks, underground and overhead cabling and substations, will leave horrific scarring on the landscape. We are all custodians of our beautiful landscape, our heritage, our natural environment and the native fauna residing there. Please do not endorse this destructive project.

Best regards
Isabelle Rowlatt



View of the ridge from our family home. This section of ridge line makes up only a small portion of the project area, which extends north, south and around to the west. Turbines would be visible for at least a 180 degree view.