Dear Sir,

Hills of Gold wind farm application number SSD 9679.

I am attaching my submission to the above-mentioned development application. I object to the hills of gold wind farm proposal. I would like my personal details withheld. I have not made any reportable political donations in the previous two years.

Wind Energy Partners proposes to build a 70 turbine wind farm along the Mount Crawney ridge to the north of us that separates Nundle from the Timor Valley. It is like building one at Leura/Katoomba In the Blue Mountains National Park or in Kuringai National Park. The environmental values of the Great Dividing Range here are no different from the Blue Mountains. It's the same range.

I can only imagine the outrage if a similar project was planned in either of those places even though they are very windy and unpopulated spots closer to where the electricity is needed and to where some of the population are presumably more amenable to wind farms. To justify such a proposal would require a very comprehensive cost benefit analysis.

This proposal also requires a comprehensive cost benefit analysis to justify it unless it is intended to inflict the proposal on country folk in a remote area where there is insufficient population to wield political power to block the proposal.

Unfortunately, the Hills of Gold Wind Farm Environmental Impact Statement contains no such cost benefit analysis. It is also misleading.

It claims that the total development footprint of the project is approximately 513 ha. I have a farm of 600 ha and you couldn't fit 70 wind farm turbines on my property. The wind turbines will stretch along the ridge 12 km east from Crawney Pass National Park to Ben Halls Gap Nature Rreserve and then 14 km north towards Hanging Rock. There will be 70 towers each 230 m high. At least 30 of these will be dotted east-west along the ridge to the north of us, each with a 24/7 light to warn aircraft, ruining the current pristine landscape of the Upper Hunter Valley.

I live at Timor, 30k south of Crawney Pass. Our views towards Crawney will be impacted by circa 30 turbines both day and night as the turbines will be lit by aviation lights. We also rely on the Isis River for our water supply- what is the potential impact on the Isis? We have had no consultation from the developer.

The project is estimated to cost \$826 million. The proponents claim it has a generating capacity of 420 MW and will supply 1100 GW hours per annum which is the equivalent energy to supply 185,000 average Australian homes. They also claim it will contribute to greenhouse gas emission reductions of 654,500 tons per annum.

There is no cost benefit analysis in this proposal. A proper cost benefit analysis would include consideration of the following issues:

The proposal is supposed to replace some of the generating capacity that will be lost when Liddell Power Station closes in 2023. Liddell Power Station has a combined electrical capacity of 2000 MW which can operate 24/7. What is the cost of upgrading Lindell power station to a high-energy low emissions coal powered thermal power station? Is it more less than \$826 million? An upgrade of the

existing Liddell Power Station would have little environmental impact and gas and coal fired electricity plants have a far longer life than wind farms.

The wind farm has a generating capacity of 420 MW but what is the estimated effective capacity if allowance is made for when the wind is not blowing?

The proposal claims it will contribute to greenhouse gas emission reductions of 654,500 tons per annum. But wind farms and batteries are built from non-renewable materials. How many tons of iron ore, concrete and plastic would be needed to build this wind farm? How many tons of rare earth metals would be needed? Mining requires massive amounts of conventional energy and so does the industrial processes to refine the minerals and then build and install the wind and battery hardware. How many tons of CO2 will be emitted in the manufacture and installation of this wind farm and the associated batteries and transmission lines? Will these in fact exceed the number of tons of CO2 claimed to be reduced by the operation of the wind farm? The proposal contains no details on these matters.

The design life of a good quality modern turbine is 20 years compared to 40 years for gas and coal fired electricity plants. The effective life of a wind turbine can be only 10 to 15 years. The proposal claims that its wind turbines will last 25 to 35 years. At the end of their life they cannot be recycled but are buried as landfill, an environmental nightmare. And that is only if the developer can afford to remove them. The project will cost \$826 million. How much will it cost to remove the wind turbines at the end of their life? The developer is supposed to remove the wind turbines. How much money is to be set aside for this purpose? What are the exact decommissioning obligations of the developer? What if a wind turbine lasts only 10 or 15 years as opposed to 35 years? This will mean the revenue from the turbine is much less than has been presumably budgeted for. There is no business case given in this document. How is the project going to generate revenue to pay for the cost of decommissioning? How do we know that Wind Energy Partners will have sufficient funds to decommission wind turbines that have come to the end of their life?

What taxpayer or other subsidies does the developer receive in respect of each wind turbine? Without the subsidies, would the development of the wind farm be commercially viable? How dependent is the ongoing viability of the wind farm on the continuation of these subsidies? Are these subsidies a reasonable investment on behalf of the taxpayer for the electricity that can be generated by the wind farm? These questions have not been answered in the proposal but are relevant to any sensible cost benefit analysis of the proposal.

Will the flashing red lights on the turbines be fixed or will they be attached to the blades and therefore be rotating? Will flashing red lights be reflected on the rotating blades?

The document claims that the collision risk for eagles is between 1 to 6 collisions per annum. Eagles are the top of the food chain here and their existence as the sign of a healthy environment. With 70 wind turbines over 26 km the potential for injury to eagles and other birdlife is far greater than this unsupported "informed assumption".

The proposal is 366 pages long. I have many objections to it, but to go through them all would make this letter of objection too long. My major objection is that if it cannot be justified to build exactly the same wind farm as this in the Blue Mountains National Park or in Kuringai National Park, then there can be no justification for building this wind farm at Crawney Pass National Park.

Yours sincerely,

Geoffrey Travers

Geoffrey Travers I Chairman I CCZ Statton

Level 24, 9 Castlereagh St Sydney NSW 2000 Tel: 61 2 9232 7655 Fax: 61 2 9222 1333

Email: gtravers@ccz.com.au



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