

Leslye Cole

22 January 2021

NSW Government
Major Projects
Hills of Gold Wind Farm

Dear Sir or Madam,

Please accept this submission on the development of a wind generating facility and associated infrastructure located 50 km SE of Tamworth, NSW. Having read the plan currently on exhibition, I have many serious concerns about the project.

Most importantly, the protection and conservation of the fragile ecological environment that is threatened by the development. Specifically, the endangered and critically endangered flora communities, the endangered and critically endangered fauna, also the physical structure of the ridgelines and plateaus of the project area which perform the vital water *recharge* function as a source of the groundwater storages of the Hunter, Barnard and Peel river catchments.

Since the commencement of engagement with stakeholders in 2017, the situation for our wildlife has changed dramatically due to the Black Summer bushfires — one of the worst wildlife disasters in modern history. The koala has been identified as being vulnerable to extinction, with surveys by ecological consultancy Biolink, finding 71% of koala populations died in 6 study areas of NSW after the fires. As detailed in the Environmental Impact Statement (EIS), there are thirteen threatened terrestrial fauna species directly within the Development Footprint, including Koala.

The proposed works include the removal of 186.73 hectares of native vegetation. Of the area to be cleared for the project's internal roads, 40-45% is threatened ecological communities (Map **F9-1**). The area immediately surrounding the project location already has 18,160 hectares of native vegetation removed due to State Forest timber production — 13,000 hectares in Nundle State Forest, 4,800 ha at Hanging Rock and 360 ha at Ben Halls Gap, resulting in ridgelines of a radiata pine monoculture, uninhabitable by many native animal species. Adding to their plight, regular logging operations leave large tracts of land completely bare. Much of the remaining land in the area is cleared and semi-cleared agricultural farmland.

Consequently, *all* remaining native bushland must be protected as being extremely valuable habitat for every section of threatened ecological flora communities detailed in the EIS. The only existing protected nature reserve, Ben Halls Gap, at 2,500 ha, is now under threat to be impacted by at least 15 wind turbines.

In Australia, it's the in-ground water that keeps the landscape alive. Water enters higher ground through *recharge* areas of well-drained soils, moving down the landscape to be stored in the layer of sand and clay that underlies much of the continent for use by plants during the inevitable dry spells. This aquifer is the source of springs and bores. The classification of the soil within the project area as almost entirely ferrosol (Map **F16-3**) suggests the whole site is one of those valuable recharge areas. These soils are only found in well-drained sites with rainfall between 700mm and 1450mm. Ferrosols have high agricultural potential because of their good structure and moderate to high chemical fertility and water-holding capacity.

Interrupting the natural filtration of water through soils on the ridgeline, by covering it with hard and compacted surfaces risks effectively 'plugging' an entry point of underground water in the landscape. Could this impact the aquifers in the wider surrounding catchments of the Hunter, Barnard and Peel river catchments, the Liverpool Plains and other flood plains? Is NSW State Government willing to take that gamble?

Regarding the biodiversity study, specifically the noted bird species in the proposed site 9.3.5 Bird Utilisation / 9.4.2.3 Collision Risk (Birds) there has been at least three major raptor omissions, and a serious underestimation of the number of Wedge-tailed Eagle *Aquila Audax*. I am a keen birdwatcher and have observed the Little Eagle *Hieraaetus morphnoides*, Brown Falcon *Falco berigora*, and Swamp Harrier *Circus approximans*, flying over the ridgelines at our farm every year at Ogunbil, approximately 35 km from the site. The Little Eagle searches for prey by soaring up to 500m altitude. Considering their flight path is known to stretch 3,300 km it is reasonable to assume it would frequent the proposed site. The Brown Falcon is known as a wind turbine collision victim flying up to 2000m elevation. The Swamp Harrier also hunts by soaring and gliding often at great heights up to 1700m.

I have also observed 7 wedge-tailed eagles feeding on the one carcass at the same time. Are there any other major omissions in the EIS?



Little Eagle observed at Ogunbil NSW 2340, photo Leslye Cole

13.1.3 HAZARDS AND RISKS / Aviation Safety / Assessment of Impacts / Aerial application of fertilisers, pesticides and aerial baiting of the EIS states:

‘Safe aerial application operations would be possible on properties within the Project Area and neighbouring the Project Area, subject to final turbine locations...by...the use of helicopters (which) enables aerial application operations to be conducted in closer proximity to obstacles than would be possible with fixed wing aircraft due to their greater manoeuvrability.’

I have observed two fixed wing crop-dusters working in tandem in the most amazing aerial acrobatic display on the one property on the Crawney Road, 8 km away from the proposed site, fulfilling their fertiliser application contract. What risks would there be to these contractor’s employment and/or safety with the placement of 70 turbines surrounding the area?

Is it acceptable that a company arranging for French and Japanese companies to buy into productive Australian agricultural land now dictates to the surrounding farmers how they can manage their property when, as savvy business people in their own right, they employ the best contractor for the job at hand?

A lot has changed since this project was proposed in 2017. There has been a huge shift in Australia’s regional economy with diversification of income and employment. Rural areas are no longer dependent on the agricultural sector, especially since COVID-19, with the pandemic changing the way we live and work. The year 2020 prompted a rethink of priority for many as working from home became the new norm. This motivated large numbers of tree and sea-changers to search for rewarding and healthy lifestyles in rural and regional areas, taking advantage of lower rent and house prices. University research has recorded ‘a new love of nature’ for people since the start of lockdown, with city dwellers yearning to spend more time in, and have connection with nature. This year has seen an influx of people into regional areas bringing their income with them.

The recent drought has also kick-started an enterprising business initiative in #buyfromthebush which has diversified income in the rural economy. Social media has offered country businesses a direct line to their city kin. The rich pool of talent and ingenuity in the country is broadcast with a never ending array of creative products being showcased, purchased by customers who enjoy knowing exactly where their money is going and what impact it is having. Farmers have also taken advantage of the increased desire for beautiful landscapes and open spaces, diversifying their income with farmstays and the exploding market of hosting Airbnb’s.

The vibrant town of Nundle is run by enterprising, entrepreneurial and caring business people who have individually and collectively attracted hundreds of thousands of visitors, and consequently, revenue to the town, and to the Tamworth region. Although a

small community, they are passionate members who punch well above their weight, winning heritage awards for preserving the built history of the town, and Community Leadership awards. They host a full calendar of events, including the annual Nundle Go For Gold festival which alone generates about \$400,000, attracting up to 16,000 visitors over 2 days, Hats Off To Country, The Great Nundle Dog Race, The Nundle Country Picnic to name a few. The Nundle Woollen Mill has won multiple tourism awards, educating about the original mill and the region's rich wool producing history. The Dag Station plays an integral part in the Tamworth Country Music Festival, the owner being a fine musician in his own right, hosting songwriting clinics for up-and-coming artists, and concerts throughout the festival. The annual event regularly brings 40,000+ visitors to the region, contributing more than \$50 million to the local economy.

Tourists come to the area for the country music, horse events, fossicking, heritage, the slow pace and beauty of Nundle and the surrounding landscape. It offers a step back in time which appeals to history buffs and those with 'slow living' values, looking for an authentic country experience. The recent COVID-19 lockdown popularised this slow living concept, epitomised by the craze of making sourdough bread.

My husband and I were tourists from Sydney, specifically attracted to Nundle for the fossicking and camping along the picturesque Sheba Dams at Hanging Rock, and The Peel River, visiting numerous times. This town was the catalyst in our decision to sell up in Sydney and make a tree-change. Once established here, my husband was employed in the role of Leading Hand Carpenter at the highly significant Goonoo Goonoo Station conversion to a function and accommodation venue where he worked for 5 years teaching his skills on restoration work, from his over-35 years experience, to the local carpenters employed on the job. My contribution is cultural, as an award winning artist with a body of work documenting the important stories of the people who live and work on the land and their animals, set in the expansive beauty of the Australian landscape. I have exhibited in numerous art shows and exhibitions in the region, including two exhibitions at Weswal Gallery, Tamworth.

Put simply, if Nundle was surrounded by 70 wind turbines, we would never have discovered this area, and would never have moved here, we would have gone past and kept on driving for our scenic country escape. How many others are like us? Could thousands of visitors disappear from the area, along with their revenue? There is a real risk of Nundle becoming a ghost town, resulting in the passionate business owners packing up to move elsewhere.

Many farmers around the area have retired to the town of Nundle, bringing their money with them. My husband and I had planned to do the same — but that will be off the table if the wind farm goes ahead.

Tamworth Council has to seriously consider how important this town is to the region.

What does the NSW Government, Tamworth Regional Council, Upper Hunter Shire Council, and Liverpool Plains Shire Council stand to gain with a proposal which goes against so many stipulations on their Local Environment Plans?

6.2 NSW Legislation 6.2.1 Environmental Planning and Assessment Act 1979

(e) “to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,

(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)”,

Tamworth Regional Local Environmental Plan 2010

- a) “to encourage the orderly management, development and conservation of natural and other resources within the Tamworth region by protecting, enhancing or conserving—
 - i) important agricultural land, and
 - ii) timber, minerals, soil, water and other natural resources, and
 - iii) areas of significance for nature conservation, and
 - iv) places and buildings of archaeological or heritage significance,
- b) to allow flexibility in the planning framework so as to encourage orderly, economic and equitable development while safeguarding the community’s interests and residential amenity
- c) to manage and strengthen retail hierarchies and employment opportunities, promote appropriate tourism development, guide affordable urban form and provide for the protection of heritage items,
- d) to promote ecologically sustainable urban and rural development and control the development of flood liable land, and
- e) to secure a future for agriculture by expanding Tamworth’s economic base and minimising the loss or fragmentation of productive agricultural land.
- To restrict the establishment of inappropriate traffic generating uses along main road frontages.
- To permit development for purposes where it can be demonstrated that suitable land or premises are not available elsewhere”.

6.2.4.2 Upper Hunter Shire Local Environmental Plan 2013

a) “to encourage the proper management, development and conservation of natural

and human-made resources in the Upper Hunter by protecting, enhancing and conserving the following—

- i) important agricultural resources,
- ii) timber, minerals, soil, water and other natural resources,
- iii) the environmental, scenic and cultural heritage of the Upper Hunter,
- b) to protect and conserve—
 - i) soil stability by controlling development in accordance with land capability, and
 - ii) remnant native vegetation, and
 - iii) water resources, water quality and wetland areas, natural flow patterns and their catchments and buffer areas,
- c) to establish a pattern of broad development zones as a means of—
 - i) separating incompatible uses, and
 - ii) minimising the cost and environmental impact of a development, and
 - iii) maximising efficiency in the provision of utility, transport, retail and other services,
- f) to secure a future for agriculture by expanding the Upper Hunter's economic base and minimising the loss or fragmentation of productive agricultural land,
- g) to protect, enhance and provide for biological diversity, including native threatened species, populations and ecological communities, by long-term management and by identifying and protecting habitat corridors and links throughout the Upper Hunter".

RU1 – Primary Production. The objectives of this zone is as follows:

- "to encourage sustainable primary industry production by maintaining and enhancing the natural resource base.
- To minimise the fragmentation and alienation of resource lands.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.
- To protect the agricultural value of rural land.
- To maintain the rural landscape character of the land in the long term".

Table 6-6 Wind Farm Provisions from the Upper Hunter DCP 2015 Design Guidelines specifically states that:

‘Ridgelines dominated with wind turbines will not be favoured’

6.2.4.3 Liverpool Plains Local Environmental Plan 2011

- a) “to encourage the proper management of the natural and man-made resources of Liverpool Plains by protecting, enhancing or conserving—
 - i) productive agricultural land, and
 - ii) timber, minerals, soils, water and other natural resources, and
 - iii) areas of significance for nature conservation, and
 - iv) areas of high scenic or recreational value, and
 - v) places and buildings of archaeological or heritage significance,
- b) to manage the urban areas of Liverpool Plains by strengthening retail hierarchies and employment opportunities, promoting appropriate tourism development, guiding affordable urban form and providing for the protection of heritage items and precincts,
- d) to provide a secure future for agriculture by expanding Liverpool Plains’ economic base and minimising the loss or fragmentation of productive agricultural land,
- e) to minimise land use conflict,
- f) to ensure that development has regard to the capability of the land,
- g) to provide a choice of living opportunities and types of settlement within Liverpool Plains,
- h) to ensure that the efficiency of arterial roads is not adversely affected by development on adjacent land,
- i) to enable development that has proper regard to the environmental constraints of the land and minimises impacts on biodiversity, water resources and natural landforms”.

It seems clear from Page 83 “**5. PROJECT ALTERNATIVES**” that this EIS was written a long time ago and is already very out of date. It states the main alternative to wind energy is the continued use of fossil fuels. This could not be further from the truth of what is developing at this point in time.

It is no longer 2017, and so much has changed in Australia since then. Our country now has the most solar panels on household roofs per capita out of any nation in the world. As of 31 October 2020 more than 2.59 million rooftop solar power systems have been installed across Australia. Falling technology prices and high electricity costs has meant that in 2019 alone there were 287,504 rooftop solar installations which was the most installs since 2012 and the third-highest number ever. Contributing to the move to solar has been the various and generous Government Solar Incentives. Millions of Australian Residents are now quietly financing and generating their own electricity and returning even more back into the grid. And our country is still being accused of being behind in reduction of greenhouse gases. Is this really true, or have we actually been behind in creating awareness of our incredible uptake of residential renewables?

Surely, *this* is the enduring monument of our generation that will go down in history, demonstrating the wisdom and foresight of our federal, state and local governments for future generations. Any great leader would be proud that their government and its constituents have come together to move toward a better and cleaner environment. Not backing an already outdated wind farm of 70 monstrous machines on one of Australia's most beautiful landscapes, which the EIS estimates will only generate power for 185,000 homes, quickly becoming technological dinosaurs after only 25 years. At which time, they will need to be dismantled and removed — and by *who*?

Might our money be better and more appropriately spent on developing more improved capacity for battery storage and utilisation of the power that the existing millions of rooftop panels are already feeding into the grid? *This* is the way of the future. Just in the last couple of weeks two of Australia's energy retailers, Origin and AGL, have publicised their intention to build and install Australia's largest batteries to connect to the grid to store the excess electricity feeding into it in their transition away from coal-fired electricity.

Looking to the future its inevitable that there will be even more uptake of domestic small-scale solar for clean energy generation. An awareness campaign informing the public about the success of the government incentives, including the Small-scale Renewable Energy Scheme and its uptake by residents would also go a long way to demonstrate how they are planning for the future and already achieving a more sustainable energy Infrastructure.

This is potentially the most significant change to the Nundle landscape since European settlement and the gold rush. However, instead of helping to add richness the town, I am worried this development might just cause its demise. The proposed Hills of Gold Wind Farm is not a choice between fossil fuels and renewables, but a choice about the environmentally sensitive siting of renewables and for choosing the most economically viable, suitable, and cutting edge technology appropriate for 2021 and beyond.

Contrary to the unbalanced portrayal of community support for the project in the EIS, the majority of the Nundle and Hanging Rock communities have signed petitions opposing the proposed Hills of Gold Wind Farm and do not want to destroy the environment to save the environment.

For these reasons I **oppose** the Hills of Gold Wind Farm.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Leslye Cole". The signature is fluid and cursive, with a prominent initial "L" and a trailing flourish.

Leslye Cole