

HILLS OF GOLD WIND FARM SSD 9679



CONCERNED CONFLICTED CONFUSED

HILLS OF GOLD WIND FARM SSD 9679

The Morrisons Gap Rd Subdivision

Part of the property Kinabalu near Hanging Rock NSW was subdivided in 1973 into 13 *lifestyle blocks* facing Morrisons Gap Rd. The blocks were advertised in the Sydney Morning Herald classifieds, September 1973.

Most residents in the nearby village of Nundle wondered why anyone would want to live in what they considered as *goat country*.

All blocks subsequently sold to people from afar who were in search of beautiful high altitude country with the accompanying mild climate. And beautiful trees, beautiful bush and plenty of rain and some snow.

At the time of purchase a covenant on the sale of the Morrisons Gap Rd lots prevented clearance of the trees.

The Developer of the neighbouring wind farm now plans to use these trees, my trees, as mitigation so that visual impact is compliant for the dwellings along Morrisons Gap Rd. How ironic!

Peter Hooper - Morrisons Gap Rd.

Topics for submission to DPIE concerning Hills of Gold Wind Farm EIS

Comments by Peter Hooper - Morrisons Gap Rd - January 2021

- **I am not a NIMBY:** I support green energy but I don't want SIX large wind turbines all within 1km to 3 kms of my dwelling.
- **Morrisons Gap Rd:** the project is a severe disruption to eleven lifestyle properties as well as impacting property values.
- **Head of Peel Rd:** as recommended in the Transport Assessment, Head of Peel Rd should be the preferred route, not Barry Rd and Morrisons Gap Rd.
- **Devils Elbow Bypass:** detrimental impact on the landscape and heritage item (Black Snake Gold Mine) by destroying the sanctity of the site.
- **Landowner Permission:** access along the transport route is dependent on permission for encroachment to be resolved *in the final design phase of construction*. This information is not provided in the EIS.
- **Neighbour Compensation:** the Neighbour Benefit Agreement is a flawed document which benefits the Proponent's submission process.
- **Community Enhancement Fund:** \$175K p/a (across 3 Council zones) is less than 1% of income per year during the project's operation.
- **Cumulative Visual Impact:** no amount of mitigation can overcome the cumulative visual impact because of the large scale of the project relative to the ridgeline and its significance to the small local community.
- **Mitigation:** natural screening measures are questionable, highly subjective and not guaranteed to be permanent.
- **EIS missing information:** private property impacts for encroachment are not available until the *final design phase after determination*.
- **Tourism:** the potential benefits to local tourism and businesses are not quantifiable but are expressed in overly optimistic terms.
- **Renewable Energy Zone:** the project is not located within a NSW Renewable Energy Zone (REZ).
- **Employment:** unrealistic projections (31 jobs for HoG) compared to other wind farms (Bargo 10 jobs, Winterborne 16 jobs). The EIS should include a complete list of jobs (on-site and off-site) for the operational wind farm.
- **Health Impacts:** no recognition and understanding of solastalgia in the EIS.
- **Signed, sealed and delivered:** glossy publicity video produced by Engie, owners of the Project, gives a clear impression that the Project is already approved.



- I support green energy but I don't want 6 large wind turbines - 230m to tip of blade - all within 3.1kms of my dwelling with 2 as close as 1.2km

- Turbines of 230m height should be 3.1km from a dwelling.

Wind Energy Visual Assessment Bulletin (Dec 2016) - page 9

- UNFAIR MITIGATION: natural screening on my property permits 230m turbines as close as 1.2km from my dwelling.
- Natural vegetation is not guaranteed to be permanent.
- Turbines not visible from dwelling but their presence is felt.
- UNFAIR NEIGHBOUR AGREEMENT: agree to what you don't want to agree to!
- Payment to agree creates inner conflict.
- Legal advice told me not to sign.
- Only 3 out of 11 residences along Morrisons Gap Rd have signed, which indicates something is wrong with such an Agreement Scheme.
- SIGN-ON FEE: payment of \$1500 to sign the agreement should not exclude separate payment for independent legal advice.

The proponent should bear all reasonable costs, including the landowner's costs for independent advice, associated with either entering into the agreement or understanding the implications of the agreement.

NSW Government Planning and Environment Wind Energy Guideline - December 2016 - page 23

- NO EXPIRY DATE: Neighbour Benefit Agreements should continue to be offered during consultation after dermination.

The Proponents will continue to engage with stakeholders during the assessment process, and if approved, during construction and operation.

7.8 Conclusion - EIS page 139

Neighbour Benefits Response Rate

- | | |
|---|------------------|
| • 5km zone: 65% have not signed NBA | 11 ADs - 21 NADs |
| • 2km zone: 100% have not signed NBA | 0 ADs - 4 NADs |
| • Morrisons Gap Rd dwellings: 72% have not signed NBA | 3 ADs - 8 NADs |
| • Barry Rd dwellings: 70% have not signed NBA | 3 ADs - 7 NADs |

DO NOT DISRUPT OUR SERENITY

FOLLOW ADVICE OF TRANSPORT REPORT

Head of Peel Rd should be the preferred route, not Barry Rd Morrisons Gap Rd.

Both TTPP and Rex Jackson in Appendix G

conclude that Head of Peel Rd should be the preferred route. *Ref. Map Page 22*

- There are 11 residences along Morrisons Gap Rd
- Only one residence along Head of Peel Rd
- Devils Elbow bypass is not required by going Head of Peel Rd
- Light traffic only for Morrisons Gap Rd
- Protect and respect our rural serenity

DEVILS ELBOW BYPASS

Do not destroy the landscape adjacent to Hanging Rock ridge line

Protect a precious heritage item - Black Snake Gold Mine LEP-1134

Do not change the vibe of Devils Elbow

It is understood that the Nundle and Hanging Rock communities greatly value their heritage, and take pride in the historic buildings and locations that represent this history. Understanding the value of such places to the local community is important in creating a holistic view of the value of heritage items.

APPENDIX N.1 HISTORIC HERITAGE ASSESSMENT page 56

Preservation of an area such as Devils Elbow and its surrounds is historically important in protecting as much as possible the landform as it existed in Hanging Rock's gold mining era.

RESPECT OUR HERITAGE



**ACCESS
DENIED**

Landowner Permission

The Hills of Gold Wind Farm project has serious problems regarding access to the site as identified in Appendix G: Traffic and Transport Assessment.

Several sections along the transport route require landowner permission for encroachment on private property.

For the final section of the transport corridor, both the Head of Peel Rd option and the Barry Rd Morrisons Gap Rd option require landowner permission for encroachment.

When is landowner permission requested?

What happens if landowner permission is denied?

Transport to the Site

Could problems with the access routes to the project site become so serious that the whole project ends up being not viable?



Employment

The EIS fails to provide a specific jobs list for the Hills of Gold Wind Farm.

Developers like to spruik employment figures associated with their projects.

Predicted numbers of jobs during the construction phase always look impressive;

216 for Hills of Gold Wind Farm.

Further more, the long term flow-on jobs are difficult to quantify;

430 for Hills of Gold Wind Farm.

What exactly are the 31 jobs required for Hills of Gold Wind Farm?

PLEASE PROVIDE A SPECIFIC LIST OF JOBS

On the jobs list, indicate which positions are;
permanent, full time, part time, casual, on-site, off-site, fly-in fly-out?

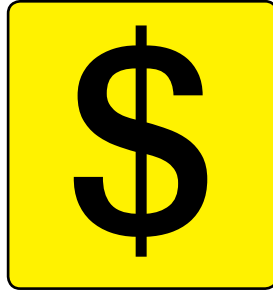
31 jobs for 70 turbines at the Hills of Gold Wind Farm is overly optimistic.

It certainly doesn't correlate with other projects:

just 16 jobs for Winterbourne's 126 turbines

10 jobs for Bango's 46 turbines.





Community Enhancement Fund

It is an accepted practice that neighbouring local communities should benefit from large scale renewable energy projects such as wind farms.

Should the structure of this fund be reconsidered to compensate the community more fairly?

Which offers a better benefit; an annual payment per turbine or payment based on a percentage of the wind farm's annual return?

Payment of \$2,500 p/a per turbine for 70 operational turbines totals \$175,000 p/a (shared by 3 Council Zones) which is less than 1% of the project's annual return.

Is this really sufficient to compensate the community for the cumulative visual impact of so many large turbines along 24km of the nearby ridgeline considering the proposed wind farm is a development in excess of \$800million with a massive operational return over 25 years?

\$175K p/a shared by 3 Council Zones equates to approx. \$58K p/a per Council

MISSING INFO

What we wanted to know
and what we thought would be in the EIS
just isn't there!

Do we now have to wait for
the final design phase after determination
to discover the impact on our property?

There are over 4,000 pages in the EIS and associated Appendixes
yet the specific cause of my angst is not addressed.

Short story: how I discovered the swept path

WHAT a surprise to see in the EIS that the Barry Rd Morrisons Gap Rd option is the preferred route when both TTPP and Rex Jackson recommend the Head of Peel option as the primary route.

I began reading the Traffic and Transport Assessment by beginning at the Port of Newcastle and noting the adjustments required along the journey for every corner. My tension increased as I got closer to Nundle as the corners became more familiar.

Once in well know territory I proceeded along Barry Rd and reached the Morrisons Gap Rd corner. I've been passing this corner for more than 40 years and the two diagrams for two blade sizes were much as I imagined they would be. No surprise there but I wondered if landowner permission for encroachment would be granted and what would happen if it's not.

My main concern is obviously Morrisons Gap Rd as that's where I built my house in 1978 after first purchasing my property in the Kinabalu subdivision in 1973. But lo and behold, the transport route for Morrisons Gap Rd is shown only as a *swept path* which lacks the detail for all the other corners from the Port of Newcastle to the Barry Rd Morrisons Gap Rd corner.

The *swept path* provides me with a worse case scenario which creates considerable inner turmoil as I try to imagine the impact on my property where major adjustments to the road will be required to allow for passage of the blades. It appears that my *urban vegetation* - a precious maple and birch tree driveway - is assessed as lesser value than native vegetation.

So I now have to wait for the *final design phase after determination*.
Not happy!

FACT: the turbines will look a lot bigger in reality than they do in photomontages

Mitigation only fixes spots here and there

- No amount of mitigation can overcome the cumulative visual impact on the local community.
- Moir's conclusion in the Landscape and Visual Assessment states that mitigation methods make it possible to *significantly reduce the visual impact to an acceptable level*.
- Mitigation can reduce visual impact, but who really decides when that level becomes acceptable?
- There is a disconnect between Moir's assessment and the real world.
- Photomontages serve a purpose for an assessment document but there's a difference between the assessment's photomontages and what the ordinary person actually sees in the real world.
- The photomontages (PM01 and PM09) showing the approach to Nundle fail to indicate the large scale of the turbines relative to the height of ridgeline. Photomontages must be viewed on a large screen.
Ref: pages 20 & 21
- There's a real worry in the local business community that the towering presence of the project will destroy the brand **Nundle** and the brand **Hills of Gold**.
- Unfortunately only time will tell if it ends up being all doom and gloom.
- Perhaps it was insensitive on WEP's part to use Hills of Gold as the name for its project. A rename survey was undertaken by WEP but this did not result in the project being renamed.

QUESTIONABLE BENEFITS

The social, environmental and economical benefits of the proposed wind farm far outweigh the identified visual impacts associated with the proposed Hills of Gold Wind Farm.

Appendix F Landscape and Visual Assessment prepared by Moir Landscape Architecture

The above is Moir's evaluation, the opinion of an outsider group which conflicts with local community opinion that the visual impact will overwhelm the Hills of Gold ridge line and destroy Nundle's brand.

1.2km to 3km

TOO CLOSE FOR TURBINES

Can mitigation work? . . . depends on who you ask

Natural vegetation as a screening measure is questionable, highly subjective and not guaranteed to be permanent.

There's a touch of irony in the use of natural screening as a mitigation measure permitting turbines to be placed in close location to my dwelling. I don't want the turbines to be so close but the natural vegetation that enables these turbines to be compliant is my vegetation on my property.

How convenient for the Proponent, how unfortunate for me. In a sense my argument is not with the Proponent but with the NSW Wind Energy Guidelines which permit mitigation measures allowing 230m high turbines to be placed closer than 3km to a dwelling.

The turbines may not be visible from my dwelling, but I certainly know they are there as I turn into my driveway each day; all five of them in full view.

So how do I sort out this conflicting state of mind? I can request that the five turbines that are within 3 kms of my dwelling should be moved to somewhere else on the project site but that is unlikely to happen.

If the locations of these 6 turbines, WP65 to WP70, are granted approval in the final determination, then serious compensation needs to be included in the Neighbour Benefit Agreement to which I have yet to agree.

The Neighbour Benefit Agreement should be renamed Neighbour Compensation Scheme.

Tourists Beware!



- The potential benefits to local tourism and businesses are not quantifiable but are expressed in overly optimistic terms in the EIS.
- With the rate that wind farms are being developed across the country they will soon become so familiar that they won't be the tourist attraction presently claimed.

Just how fluid are the REZ boundaries?



- The NSW Government's Electricity Strategy has set out three Renewable Energy Zones (REZ) in the State's Central-West Orana, New England and South-West regions.
- The Hills of Gold Wind Farm project is not located within one of these Renewable Energy Zones as illustrated in Fig 2-3 page 25 in the EIS.

Health Impacts



- Many medical reports indicate that there are no significant health impacts resulting from wind farms. However most of these reports refer to physical conditions with no understanding of a mental condition known as solastalgia. There is no recognition and understanding of solastalgia in the EIS.

Solastalgia is now used by academics worldwide to describe the distress people feel when what they consider 'their place' is undergoing dramatic change.

Loss of social cohesion

PRESERVE OUR SENSE OF PLACE

- Solastalgia can be explained as feeling 'homesick without leaving home'. It is disingenuous to claim it is the same as an Indigenous person's loss of *connection to country*, but to a non-Indigenous person it develops as a sense of *loss of place*.
- The manner in which the Hills of Gold Wind Farm application process has evolved over the past three years has fractured the local community, creating divisions amongst those who support and those who object to the proposal.
- Differences amongst neighbours of associated and non-associated residences are another form of division.
- How social cohesion is restored is a dilemma. It's far from simple. The comment 'just get over it' doesn't help.

IMPACT ON PROPERTY VALUE

SIX large turbines within 3.1km of my dwelling will certainly not increase the value of my property as a *lifestyle* block but it will certainly limit the field of potential buyers when it comes time to sell with a likely decrease in value.



APPROVED

Signed, sealed and delivered

The clever publicity video produced by Engie, owners of the Project, gives a clear impression that the Project is already approved by State Planning.

It is understandable that Developers like to promote their projects. Engie's release of this video was cleverly timed just before the public submission period and before approval by DPIE.

What would it take for Engie to decide not to proceed with the Hills of Gold Wind Farm?

Questions for Response

1 - Why is the Barry Rd Morrisons Gap Rd the primary route when both TTPP and Rex Jackson Transport Assessments conclude that Head of Peel Rd is the preferred route?

2 - Will the Proponent relocate SIX turbines WP65 to WP70 elsewhere on the project site so they are not as close as 1.2km to my dwelling but at least 3km away?

3 - Will the Proponent concede that the potential environmental and heritage impact caused by the Devils Elbow Bypass is too severe for that plan go ahead?

4 - When and how will landowner permission be negotiated to obtain permission to encroach on private property to provide access along the transport route?

5 - Can DPIE grant approval for the Project if landowner permission is not obtained before determination?

6 - Will the Proponent please provide a detailed list of the 31 jobs involved when the wind farm is operational?

7 - Will the Proponent negotiate during the final design phase of construction with those affected by its implementation?

8 - Will the Proponent redraw the Neighbour Benefit Agreement as Neighbour Compensation to be negotiated if approval is granted?

9 - Will the Proponent adjust the health impact in the EIS to recognise that solastalgia is a legitimate mental health condition caused by a disruption such as a large wind farm development proposal?

10 - What is the justification by the NSW Government for the site of the Hills of Gold Wind Farm project to be outside a REZ boundary?

... See IMAGES on following pages 15 to 24 ...



It is expected that further physical evidence associated with activities at Black Snake Gold Mine may be encountered in the area. EIS App N.1 page 53



Photograph 5.31 Mineshaft, southern side of Barry Road (ERM 2020) - EIS App N.1 page 54



Photograph 5.32 Detail of mineshaft (ERM 2020) EIS App N.1 page 54

The Devils Elbow: Two Views, c1890 and 2018



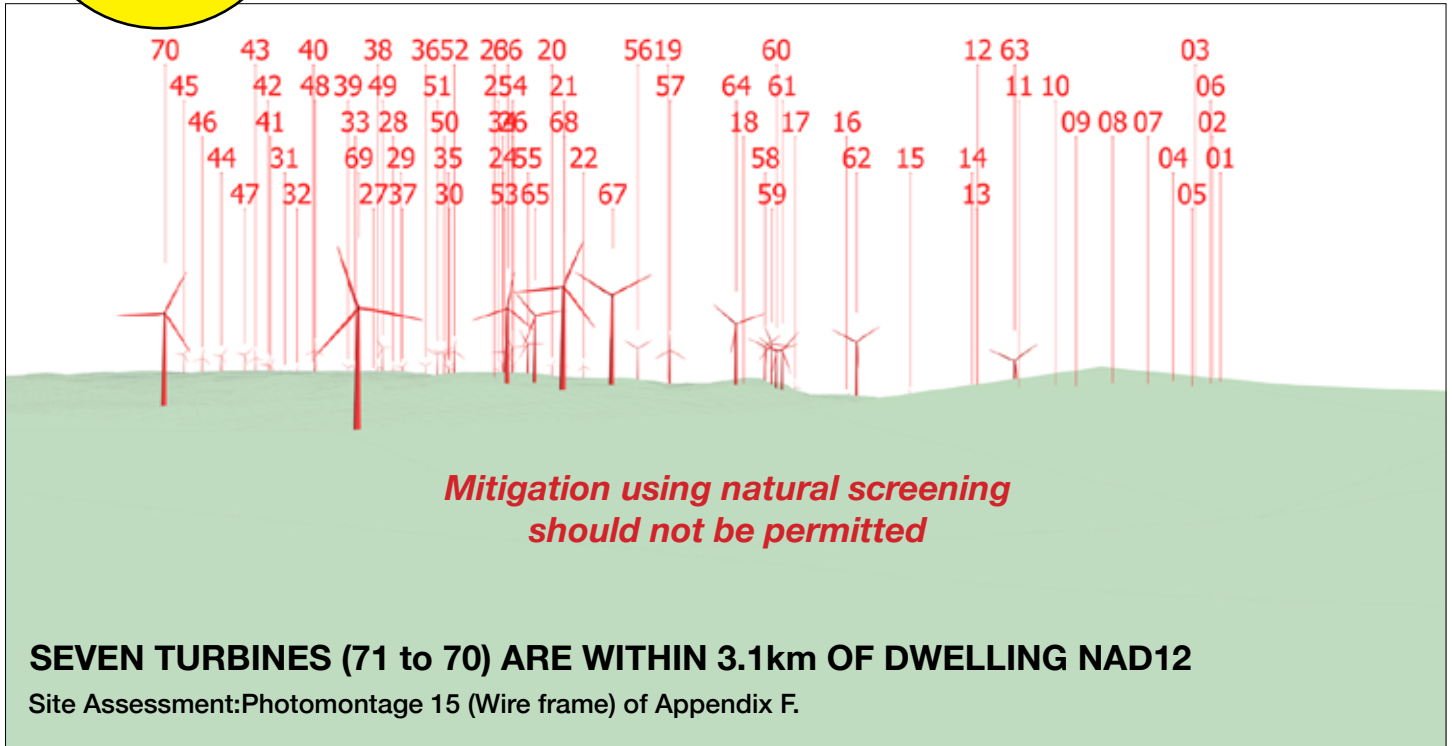
'One of the reasons for Hanging Rock's relative isolation is the difficult 6 miles of road from Nundle. Four of the miles are up a steep tortuous track cut out of the hillside. It is called the Devil's Elbow and is in fact a series of elbows and hairpin turns with a steep drop edged by a flimsy fence on one side.'



In the 1980s the *Devils Elbow* section of the Nundle to Hanging Rock road underwent a major upgrade as part of a Bicentennial Road Grant which reduced the steepness slightly but retained the character.

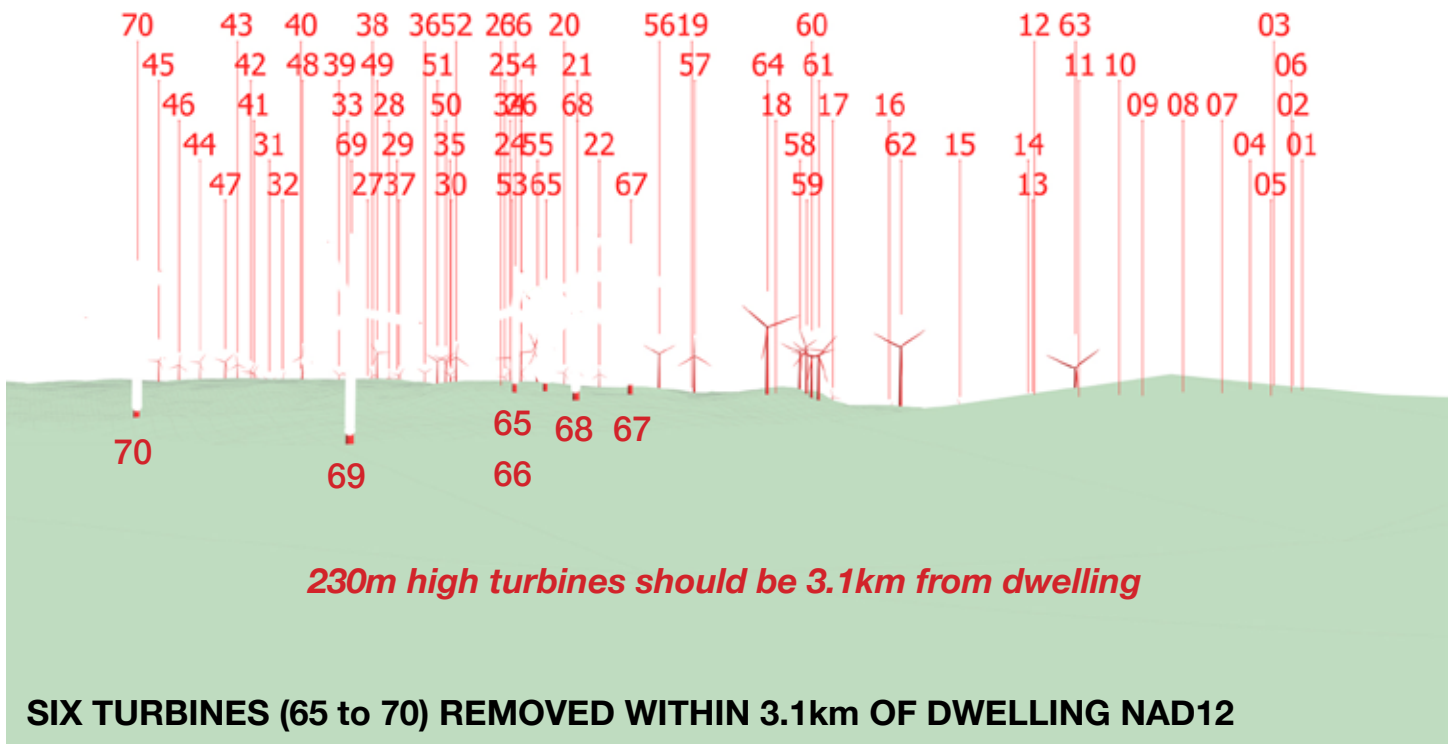
COMPARE THE PAIR

Interpreting a wire frame can be a challenge!



NAD 12

Approximately 60 to 70 turbines would be visible (based on topography alone), with **seven turbines within 3100 m**. Limited filtered views are available through the vegetation towards the Project Area. (App. F LVIA App. D PM15)



Photomontage 15 (Wire frame) of Appendix F. with Turbines 65 to 70 removed

PROTECT AND RESPECT OUR TREES



REMOVAL OF VEGETATION FOR BLADE OVERHANG

**NAD-12
SWEPT PATH
IMPACT
FOR BLADE
OVERHANG**

• Our precious birch tree driveway - planted 1985

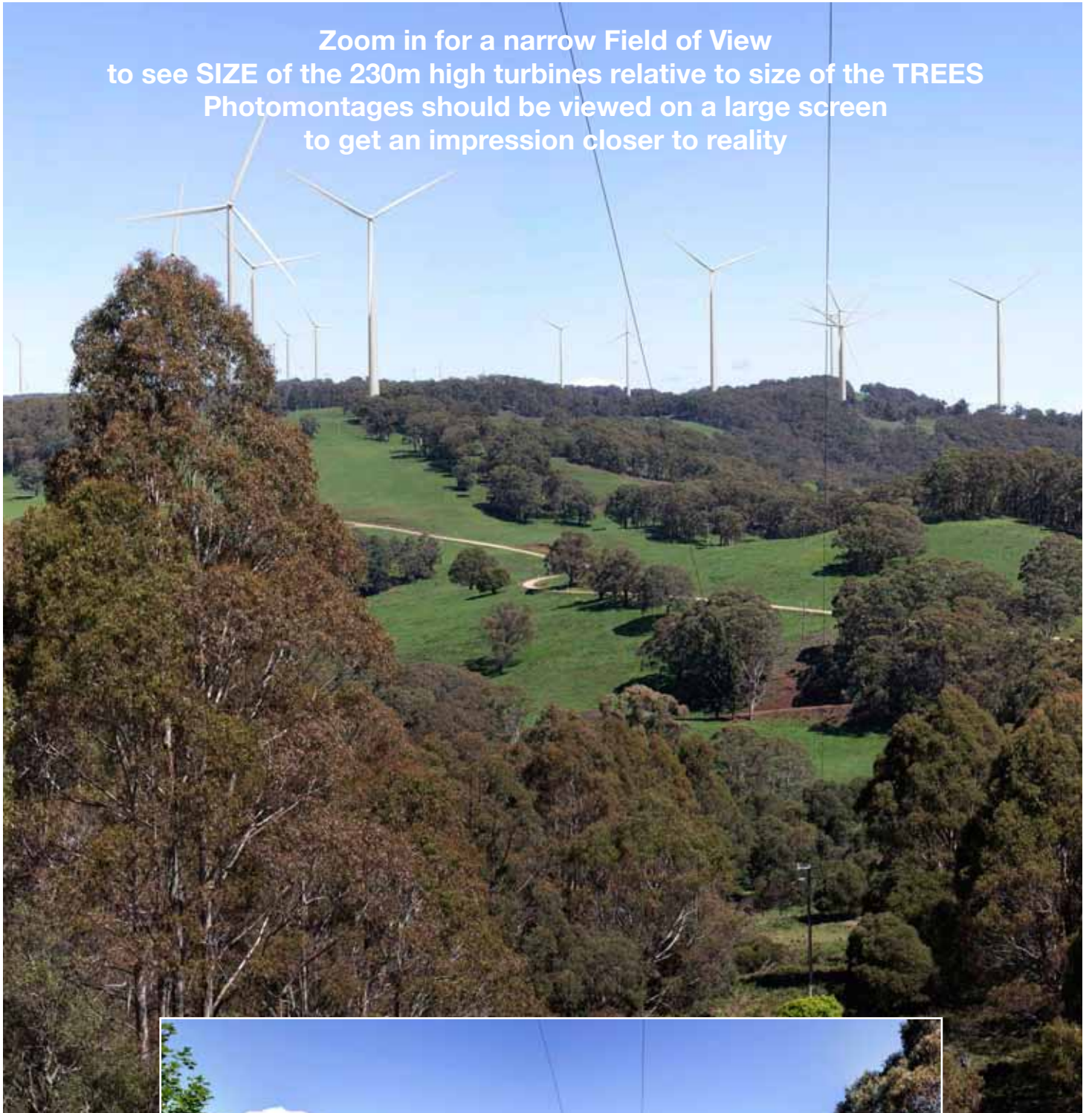


REMOVAL OF VEGETATION FOR BLADE OVERHANG

SOLUTION
GO HEAD OF PEEL RD
TO AVOID IMPACTS ON
MORRISONS GAP RD

• Morrisons Gap Rd: the corner before turning into our driveway •

**Zoom in for a narrow Field of View
to see SIZE of the 230m high turbines relative to size of the TREES
Photomontages should be viewed on a large screen
to get an impression closer to reality**



Photomontage 07: Proposed View - 60 degree Field of View

READING A PHOTOMONTAGE IS PROBLEMATIC

Zoom in to see SIZE of the 230m high turbines relative to size of the HILLS



Photomontage 09

Appendix F LVIA App D PM 09-10



Zoom view
above

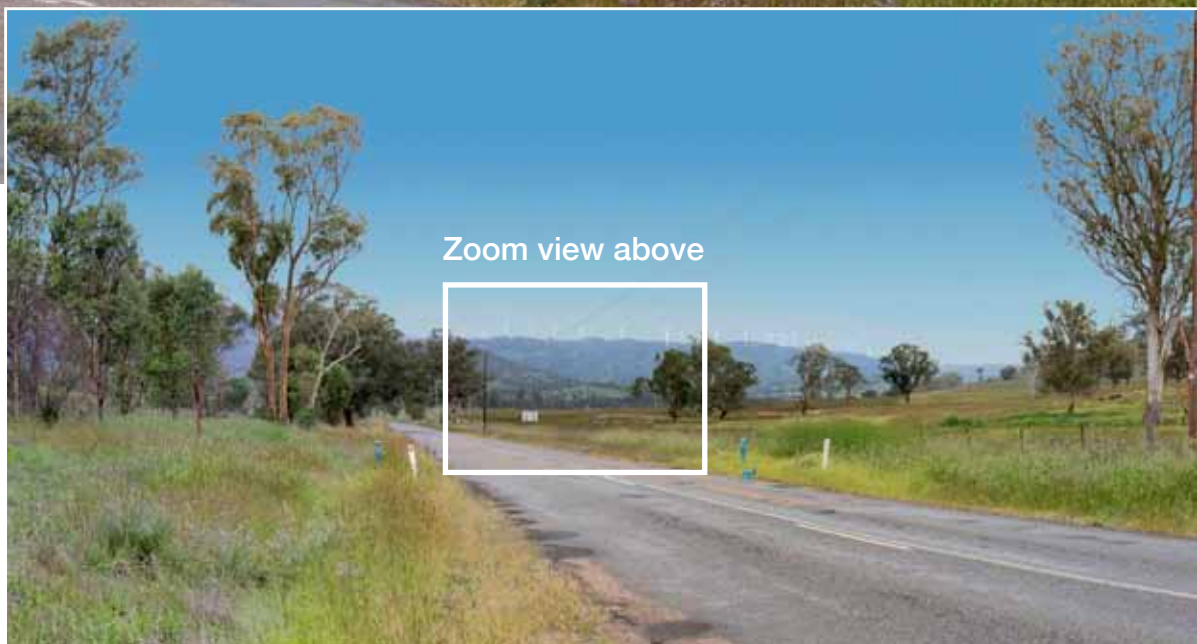


WARNING

To view a photomontage
project it onto a
large screen TV.
100inch (220cm wide)

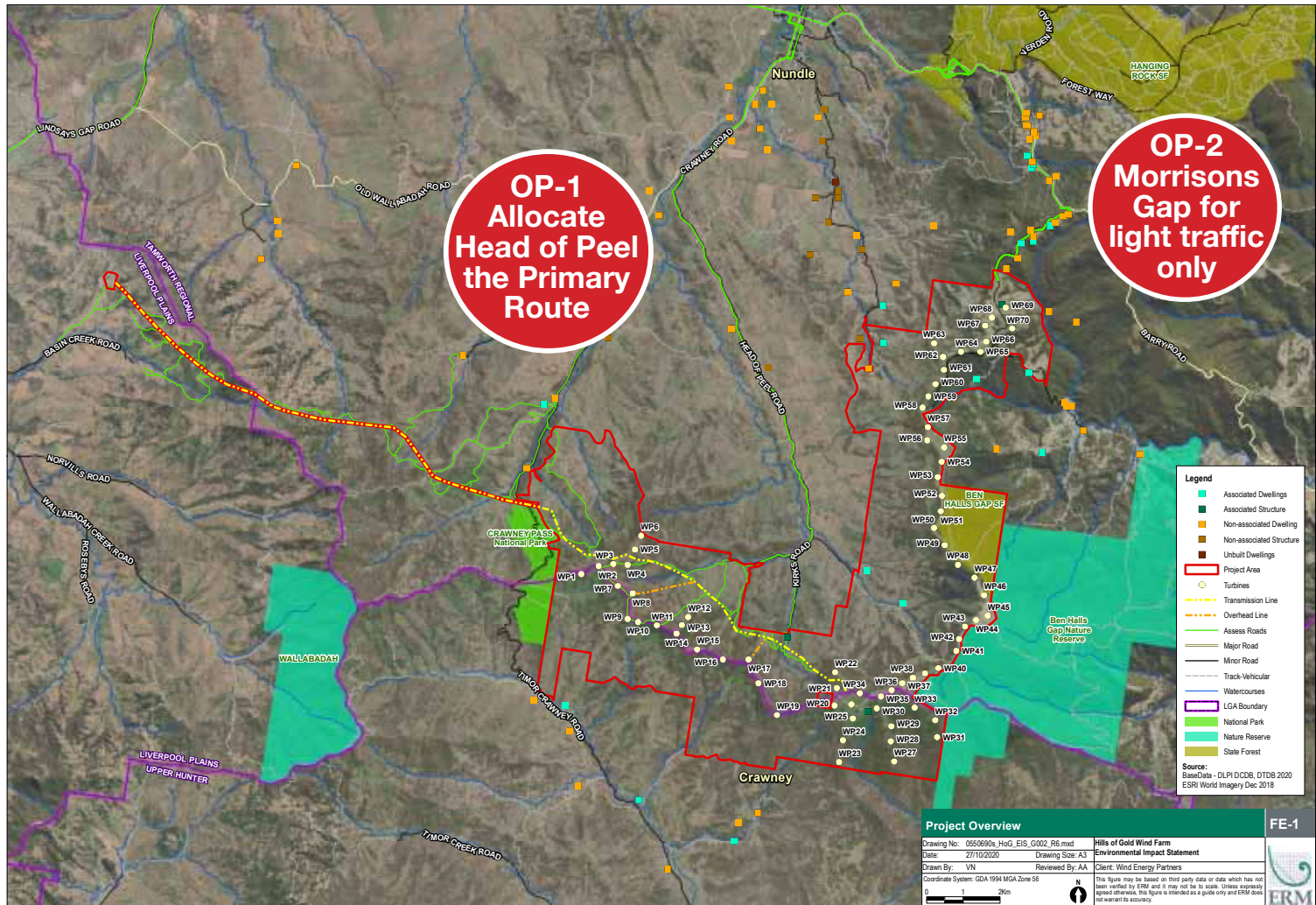
Proposed View - 60 degree Field of View

Is the Cumulative Visual Impact *acceptable*?
BIG CHANGE IN CHARACTER FOR THE HILLS OF GOLD



App F LVIA App D PM 01: Proposed View - 60 degree Field of View

ACCESS TO THE PROJECT SITE



EIS Hills of Gold Wind Farm: Map FE-1 Project Overview

Option 1: Nundle to Southern Site Entrance (Head of Peel Rd and Kirks Rd)

Option 2: Nundle to Northern Site Entrance (Barry Rd and Morrisosn Gap Rd)

Option 1 in our opinion is the only realistic route out of both

Rex J Andrews - App G: Summary of Routes - Page 159

A constraint on Barry Road has been identified that is known as Devil's elbow. Three options have been developed to realign the Devils Elbow section of Barrys Road. Even with these works the gradient would still provide limitations and it is expected that trucks carrying heavy loads would require multiple prime movers in push-pull arrangements to allow them to negotiate the steeper slope. ttp - App G: Conclusion - Page 92

NATURAL VEGETATION USED AS MITIGATION TO REMOVE VISUAL IMPACT CANNOT GUARANTEE THE TREES WILL ALWAYS BE THERE



**The chances of damage from bushfire is increased
because of climate change**

TOO CLOSE FOR COMFORT

Photo following a recent bushfire (Dec2020)
approx. 7.5kms from Hills of Gold Wind
Farm project site. Luckily these trees were
not our trees but they could have been!

**NATURAL
VEGETATION
AFTER BUSHFIRE
FAILS TO PROVIDE
ADEQUATE
SCREENING**



TOP: HoG WF turbine - PM14 cropped
BELOW: 230m high turbine and Sydney Harbour Bridge
Top of bridge arch above water - 130m
Height of HoG WF turbine tower - 150m