

Hills of Gold Wind Farm: SSD 9679

Submission by Brenda Gerrie

Thank you for the opportunity to make a submission opposing the Hills of Gold Wind Farm.

My submission takes the form of a series of “please explain” questions which I expect the proponent to answer in their response to submissions since none of these issues have been addressed in the EIS.

Question 1: Please explain the conclusion reached on P215 of the EIS that:

The proposed development positioned in a landscape that has remained largely unchanged and would become a feature of the visual landscape. However, it is likely the character of areas which are valued for their high landscape quality and utilised for recreation and tourism will remain intact.

Neither of these sentences make any sense. The proposed wind farm has 70 tall turbines perched upon a ridgeline which will dominate the Peel Valley on three sides and certainly will change the character of the landscape.

Please explain what you mean and how you arrived at this conclusion.

Question 2: Please explain the next conclusion reached on P215 of the EIS that:

Regionally, significant landscape features would remain dominant features of the landscape and it is unlikely the proposed development would degrade the scenic value of these landscape features.

Please explain how you arrived at that conclusion when the Department of Planning clearly states that *the height, scale and mechanical character [of a wind farm] creates unavoidable visibility which can alter the landscape character and people’s enjoyment.* (NSW Wind Energy Guideline, P7).

Moreover, the Department of Planning routinely assesses the extent to which a wind farm proposal will change a natural or pastoral landscape into an industrial landscape. A key component of that assessment is the ability of the landscape to absorb change. It is obvious that the wind farm will change the local landscape significantly when the proposal is for 70, 230m tall highly identifiable man-made structures atop the ridgeline surrounding the Peel Valley.

Question 3: Please explain how a wind farm can create ecotourism opportunity as you have mentioned multiple times throughout the EIS.

Ecotourism goes hand in hand with conservation and usually caters for tourists wishing to experience the natural environment without damaging it. Ecotourism and an industrial landscape are incompatible.

Question 4: Please explain why there is no mention in the EIS of the many eco-tourism activities in the Peel Valley which are reliant upon the Hills of Gold for a wilderness, cultural or heritage experience or as a backdrop for significant events.

There are many pre-existing tourism ventures close to the wind farm including music festivals and weddings which attract people looking for scenic beauty, tranquility and ambience. All these tourist ventures will have panoramic views of the wind farm.

I suggest that it would be highly unusual for a couple to choose a wind turbine backdrop for their wedding. A meander between turbines would hardly qualify as a wilderness experience. But bungee jumping from the top of a turbine may well attract more visitors than an open day.

Question 5: Please explain why the site chosen for the wind farm is at odds with the National Wind Farm Commissioner's observations about site selection.

Mr Dyer says... *based on our complaint handling experiences, the Commissioner has found that locating wind turbines on the top of hills or ridges, while optimum for capturing the wind resource, can have greater impacts on visual amenity, may lead to specific noise and shadow flicker scenarios for residents in the valley beneath and may have other dislocation impacts on the community. Access roads for hill and ridge wind farms can also be obtrusive and significantly damage and constrain the remaining available farming land in the area. Conversely, there appear to be minimal issues raised to date about wind farms that are located on large land holdings, or on flat or slight to moderate undulating land and sites that are well away from neighbours and towns.* (Observations on Site Selection, 2020 at <https://www.nwfc.gov.au/observations-and-recommendations/site-selection>).

Mr Dyer has just described the Hills of Gold Wind Farm implying that it is a high impact obtrusive wind farm.

Question 6 Please explain why it is acceptable to locate over one third of the turbines within the HIGH visual impact zone of almost one third of the dwellings with no justification other than to say vegetation screening might work.

This flies in the face of Visual Assessment Bulletin guidelines which states that turbines within the HIGH visual impact zone (3100m) should be avoided and that vegetation screening should not be the first mitigation option considered when it can not only block desirable views but vegetation can be lost for any number of reasons including, storm, bushfire etc (Visual Assessment Bulletin, P39)

Question 7: Please explain why it is acceptable to locate over 80% of the turbines within the MEDIUM/HIGH visual impact zone (less than 4450m) of almost every identified non-associated dwelling in the EIS.

Again, this flies in the face of the Visual Assessment Bulletin guidelines.

Question 8: Please explain the rational for placing turbines so close together when there are 13 turbines less than 1 rotor diameters from a neighbouring turbine, 54 turbines within 2R of another and 65 turbines within 3R of another and all but 1 turbine has another at a 4R separation distance at blade height.

Moreover, 13 turbines have 5 or more neighbouring turbines within 4R at blade height.

Would you also like to comment on the merits of a wind farm design which places turbines so close together, the likely consequences and the effect it might have on wind farm efficiency and turbine manufacturer warranty.

Question 9: Please explain how the decision to place so many turbines so close together and so close to non-associated dwellings was made.

If not bad wind farm design, then this illustrates the intention to fit as many turbines as possible in the space with little or no consideration given to the impact on people and the environment.

The result is visual layers of overlapping turbines guaranteed to increase the visual impact.

Question 10: Please explain how the cluttering effect of layers of turbine blades spinning at different angles and speeds has been factored into the visual assessment.

Department of Planning has previously expressed concerns about the cluttering effect on visual impact. (Jupiter Wind Farm Assessment, 2018).

Question 11: Please also explain how the cluttering effect of layers of turbine blades spinning at different angles and speeds has been factored into the noise and shadow flicker assessments.

Department of Planning has previously expressed concerns about the cluttering effect. (Jupiter Wind Farm Assessment, 2018).

Question 12: Please also explain how the cluttering effect of layers of turbine blades spinning at different angles and speeds so close together on edge of Ben Halls Gap Nature Reserve has been factored into the BDAR.

There are 22 turbines on the edge of Ben Halls Gap Nature Reserve many of them stacked one behind the other and ~170m apart at blade height and so guaranteed to form a barrier for bats and birds.

There is also a cluster of 6 turbines about 1Km from Crawney NP and the separation distance between blades is 100m-120m – also a barrier for bats and birds.

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