

Director – Energy Assessments
Planning and Assessment
Department of Planning, Industry and Environment
Locked Bad 5022
Parramatta NSW 2124

DATE: 25 January 2021

TO WHOM IT MAY CONCERN

RE: HILLS OF GOLD WIND FARM APPLICATION NO.SSD 9679

- I am attaching my submission to the above mentioned development application
- I hereby declare that I object to the Hills of Gold Wind Farm proposal ID no.SSD 9679
- I would like my personal details withheld
- I have not made any reportable political donations in the previous 2 years

I am writing to object to the proposed Hills of Gold Wind Farm proposal ID no. SSD 9679 going ahead on our beautiful ridge for many reasons and I thank you for this opportunity to submit these objections. This is most definitely the wrong location for a wind farm.

I am a long-time resident of Nundle having lived in here for a period of 8.5 years (1995-2003) and returning to buy a property in Jenkins Street, Nundle in 2011. I have been living here permanently since the beginning of 2015. I also was a regular visitor to Nundle as a camper from the 1980's every summer holidays with my family camping in a caravan park site down by the river. This is when I first fell in love with this unique and stunning country - enough to leave my family, life, job and beach-side unit to bring my young family here to live.

So, this brings me to community, belonging to country and the importance of that belonging in these times especially. I believe that the community here, before the serious disruption that this controversial Wind Farm has caused, was generally harmonious and hummed along to a beat that attracted people like myself to the timeless beauty and called to a part of me that longed for deep connection to place. Its isolation and feeling of a "time long gone", its beautiful landscape, access to the bush and bush creatures, swimming holes and genuine country hospitality and kindness makes it a jewel of a place. And these places are fast disappearing. I have been reading about humans' need to belong and how that feeds into our creative lives and urges us to take care of our living environments. I quote:

From "Knowing Our Place" by Barbara Kingsolver:

"Our greatest and smallest explanations for ourselves grow from place, as surely as carrots grow from dirt. I'm presuming to tell you something that I could not prove rationally but instead feel as a religious faith. I can't believe otherwise."

"In the summer of 1996 human habitation on earth made a subtle, uncelebrated passage from being mostly rural to being mostly urban. More than half of all humans now live in the cities. The natural habitat of our species, then, officially, is steel, pavements, streetlights, architecture, and enterprise -- the hominid agenda. With all due respect to the wondrous ways people have invented to amuse themselves and one another on paved surfaces, I find this exodus from the land makes me unspeakably sad. I think of children who will never know, intuitively, that a flower is a plant's way of making love, or what silence sounds like, or that trees breathe out what we breathe in...."

"A world is looking over my shoulder as I write these words; my censors are bobcats and mountains. I have a place from which to tell my stories. So do you, I expect. We sing the song of our home because we are animals, and an animal is no better or wise or safer than its habitat and its food chain. Among the greatest of all gifts is to know our place."

From "Reciprocity With Nature" by Toko-Pa Turner:

"When I moved to the country, I was thrust into a sudden relationship with the sun and the moon, the stars and the landscape, where the most impressive thing on the horizon was trees. In a city, the greatest things on our horizon are towers made of glass and steel, man-made testaments to our dominance and virility. Only taller than trees are mountains. And only wider than mountains is the sky, and pastures spread out as far as the eye can see. It

alters the psyche entirely to be in a place where nature prevails in that it relativizes our importance in the larger family of things."

In these quotes I find a way to express how I feel about living here in the Nundle/Hanging Rock/Bowling Alley Point/Crawney environs. A feeling I am sure is shared by many, if not all, of the community that have chosen to live here. When you have this connection then you are duty bound and impelled to protect, fight for and preserve all that lives and thrives within this unique and fragile world. Not only for those of us living here now but for future generations to come.

I consider this environment is one that inspires, elevates and facilitates all my creative endeavours. It would be so for many people who have come to live here and who visit. Great Australian art has been inspired by just such landscapes, vistas and views. Just think of Arthur Streeton, Albert Namatjira, Tom Roberts, Hans Heyson et al. The unique Australian beauty is captured by these artists in a way that we, as Australians, love. The light, colours, landforms, skies, gums, and native flora. These artists took their easels, their paints and palettes and set themselves up amidst places such as exist here in our Nundle/Hanging Rock/Crawney/Timor landscapes to this very day. Today's and tomorrow's artists deserve to be able to do the same, to continue to find the joy in being outdoors, in being in touch with the elements, in being absorbed in our beautiful heritage and for that to continue to be free and unencumbered by the trespass of the world of industry. We, who live here, see it as a privilege to be caretakers and protectors of such a rare convergence of elements. We know it and honour it for what it is and what it will always be if it remains something that is seen to have the intrinsic value we, as Australians, ought to see in it. The value of a landscape should not be measured in how much we can extract from it and squeeze dollars from it. There is something immeasurable and infinite about what we can gain spiritually and collectively by not allowing our countryside to become a mere commodity.

To think that we can allow so-called experts to attempt to quantify what is truly unquantifiable is just plain wrong. For them to bring their calculating brains and equipment to judge the merits and calculate the value of highly scenic landscapes and judge the lives and value systems held by those living in those environments is a dangerous practice to continue to perpetrate. A view, a landscape, the sky, a night sky, birds and animals add a contentment, a serenity, a place to go when you need to reconnect to spirit and the land. No way in the world can these things be assessed – yet this EIS attempts to do so. In other parts of the world authorities have legislated against wind farms (wind power plants) being built in such environments as that of this proposed project. For example in Victoria the State Government legislated no-go zones for wind turbines in areas of high scenic beauty and environmental sensitivity, like the Yarra Valley and Mornington Peninsula (https://www.planning.vic.gov.au/_data/assets/pdf_file/0015/13911/AN47-Amendments-VC82-and-VC91-Changes-to-Wind-Energy-Facility-Provisions.pdf). If one Australian State Government is cognizant of the importance of protecting an area of high scenic beauty against development, they must have found sufficient and identifiable evidence of the need. They have seen the big picture (pun intended). NSW has such areas of high scenic beauty too but there is no legislation protecting them unless they are within an area defined as listed on the Natural Heritage List. This list needs expanding as a matter of urgency.

The whole premise of having to write a submission objecting to this project makes me feel that our Governments' just don't get it. This project should never have gained the legs to be walking all over us. It should have been denied before it even began to cause such a monumental disturbance to lives and livelihoods, create division and put under threat all that we love.

I am a member of the Hills of Gold Preservation Inc (hereinafter referred to as HOGPI) and have been since its first meeting. I have kept myself informed of all the research the executive has managed to accumulate since the project was first mooted and kept up to date with the minutes of the CCC meetings and enquiries HOGPI have made to various bodies leading up to the lodging of the EIS. HOGPI is compiling a comprehensive submission objecting to the proposal that I am fully in support of. The submission that HOGPI will file will represent my views and objections fully and will cover the areas that are of great concern to me and our group's members.

This preface gives context and background to my own personal objection(s) but it is, in itself, an objection. I object to the fact that my feelings of harmony have been destroyed (hopefully temporarily), my happiness has been diminished, my anxiety has been heightened, my time has been spent researching, ad nauseum, Wind Farm impacts worldwide, my sense of community put on hold, my security and peace of mind trampled on. And I also object to the fact that my feelings of belonging to a special place and the importance that this has in my life seemingly has no value or merit in the eyes of those who want to create an industrial landscape and profit from destruction.

Let's go right back to the beginning:

COMMUNITY CONSULTATION

E.3 Community and Stakeholder Engagement - Page 28

These are my diary notes from the first WEP meeting:

"At a public meeting in March (2018) a spokesman for the proposed development addressed a packed crowd on the merits of such towering edifices parked on our beautiful range that overlooks our small historic village. At this meeting there were few quantitative facts that were given, and the overall picture is one where the developers opine that as well as the wind turbines being a valuable source of renewable energy there would also be a boon to the village with up to 32 permanent jobs. He also conjectured a boost to tourist numbers with groups wanting to come and tour the wind farm area and also there would be an unprecedented chance for Nundle residents to prosper from the construction workers with house rentals and the businesses benefiting from catering to the extra requirements of a large workforce.

He also could not confirm any specific details regarding the project but glaringly compared the village of Nundle with a population of approx. 400 adult residents to a recent wind farm development near the town of Glenn Innes with a population of 8,836 residents (2016

census). To make the comparison in monetary benefits between a village and a large rural town is offensive and simplistic.

It seems Wind Energy Partners have not really done their homework. Nundle is a very tiny village and rather than benefiting from this proposal it would, I suggest, change irrevocably everything that the people who live here love about our little piece of "heaven".

At the meeting there was also mention of a proposed Community Impact Fund that to my mind, is a carrot to entice residents to accept compensation for something no-one can quantify. How much money compensates a community for the loss of its very personality and integrity, its harmony with the natural surroundings and its gift to future generations of Australians of its vibrant heritage. To imagine that an enticement of money is even on the table says to me that there is definitely a knowable strong negative side to this proposal that even the developer is more than aware of. Compensation equals loss – sometimes, as I have mentioned before, an unquantifiable loss that no amount of money can begin to counterbalance. The spokesman at the meeting when answering a question as to the proposed number of turbines being considered used the term "worst case scenario" when saying that 98 would be the upper number...that 98 would be ... "the worst case scenario". So, by even by his assessment the more they put up the worse it would be! "

From the very first meeting the community was expected to fully support this project. The "consultation" consisted of WEP touting the benefits, quoting (inflated) job figures, promising an "enhancement" fund (initially called an "impact" fund) ignoring any concerns and generally saying "watch this space" when questioned.

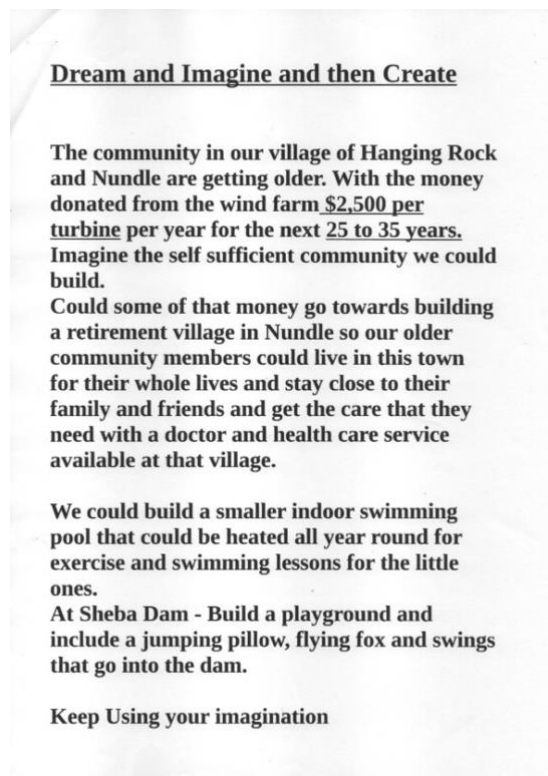
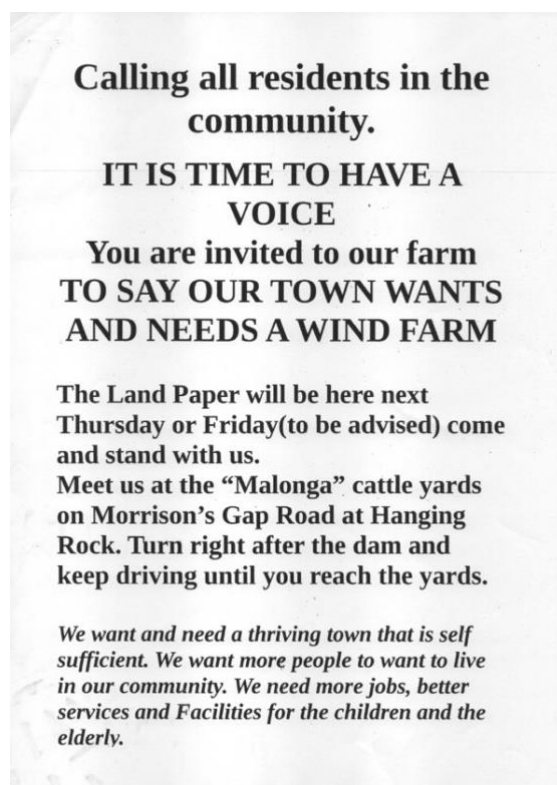
"Watch this space" was WEP's answer to most questioning over the coming years. Evasion and dissembling the norm. It is my opinion that their other ploy is and was to downplay and disregard the level of opposition this project has and the fact that the majority of Nundle/Hanging Rock/Crawney and Timor residents are opposed to the project going ahead. HOGPI has been able to demonstrate this irrefutable fact through a petition that was signed off on by a Justice of the Peace and lodged by Kevin Anderson MP with the Table Office, NSW Parliament on 18th November 2020. WEP has never been able to show by signatures a demonstrable support in the community for this project. Why not? Because the majority (70%+) do NOT support it. WEP said in the very first public meeting that if the community did not want this project then it would not go ahead??? We demonstrated that we did not and that should have meant the project not proceed.

WEP's arguments are often ad hominem – referring to those who oppose as being "uninformed" and "a vocal minority". They have consistently ignored the level of opposition and the investigation skills of those who have taken the time to do intensive research and who are far from uninformed. They also ignore evidence that there is strong and sustained objection to the project from a majority of the local residents and continue to give the impression of a "vocal minority" in media interviews.

From the word go figures on "jobs for locals" has been overestimated. These figures are misleading. One thing that seems to have changed over time is that the proponent has now changed their talk about "jobs for Nundle" to jobs within an hour's commute of Nundle –

which includes FIFO workers during the construction period. This is important because WEP, in trumpeting these so-called local jobs, dangled a carrot that is now proving to be a fiction. The numbers of jobs stated in the EIS (prepared by ERM) are representative of the continued erroneous claims of WEP. These figures have not been properly justified or explained. Locals have been misled from the very beginning regarding these numbers and it is important these figures are properly justified because there are people who are in support of the project based on the idea of these "jobs for Nundle" alone. **The Department should ask the proponent to justify and give evidence for these figures and their relevance to Nundle locals.**

The major landholder has, via public notices, given the community a false sense of what a Community Enhancement Fund is and how it works. In one notice there is an implied promise of the funding of such things as: a retirement village, doctor, indoor swimming pool, jumping pillow, flying fox and swings into Sheba Dams, family tourist and adventure park at the wind farm with ski run, toboggan rides, mountain bike riding, horse trails, walking and buggy tours, inflatable ball rides, paddle boats, rock climbing wall and ninja warrior course, pipeline from Chaffey Dam to Nundle, community garden, skate park, go-kart track, possible if the project were to go ahead (images of public notice below):



**A Family Tourist and adventure park at
the wind farm**

Which will create long term employment for people

- A possible 300 to 400 metre snow ski run in winter
- Toboggan rides down the hill
- Mountain bike riding
- Horse trails
- walking trails and buggy tour rides
- Inflatable ball rides down the air strip.
- Inflatable ball rides across a dam
- trout fishing
- cabins
- paddle boats
- An indoor family fun centre with a rock climbing wall and ninja warrior course.

Could you please forget about the visual affect of the wind farm for a minute and imagine the benefits that can be gained from it.

**DON'T BE AFRAID TO SPEAK UP
AND PLEASE USE YOUR IMAGINATION.**

That these pursuits are completely at odds with the reasons most people have chosen to live far from these aforementioned trappings of a more industrialised/city landscape is not really the point. The point is that the landowner was attempting to gain support by misleading the community about the Community Enhancement Fund. WEP has not sought to rectify misinformation disseminated by the host majority landholder (who has an obviously significant pecuniary interest in the project) thus how can a representation of support for their project be accurate when the community's perception of what the benefits will be are conflated and at times wholly incorrect?

In the third meeting of the Community Consultative Committee (CCC) meeting on 10th December 2018, WEP answered a prepared list of Initial Questions HOGPI members had asked at the previous CCC meeting on 19/09/2019. In one question:

"What responsibilities does WEP have to correct misinformation circulating in the community once it becomes aware of it?"

WEP answer: *"We see this as an ongoing responsibility to be aware of information that is being circulated however as is the case with vast channels for distributions we focus on ensuring accurate information is available on our website. WEP maintain a website which offers regular updates on the project and details provided through CCC meetings for those interested. Someva also undertake one-on-one meetings with anyone who has questions about the project. We encourage anyone within the HOGPI to reach out if they would like to speak to us directly."*

Then at the CCC Meeting 24th August 2020, the Minutes Agenda Item 7 General Business – under the subheading "Discussion", I quote the following: *"Community member said a lot of*

media has happened over the last couple of months including a letter which was distributed at the post office and then the interview on the radio program. A lot of misinformation that is being distributed to this community. On the radio it was said that the money from WEP was sitting there ready to build. Jamie confirmed he did not say that and that there were a number of comments that pre-empt the results and presentation of the development application being made. Jamie reiterated the importance of respecting the State Significant Development process and that full information could be prepared for people to form views and ask questions during public exhibition.

Community member went on to talk about concerns generated as a result of the landholder denigrating the efforts of members of Hills of Gold Preservation Inc who fought the first fire in summer in the Nundle area."

Under Action: Whom was stated:

"Member to give a copy of the letter to David who will distribute to CCC members".

At the next meeting there appears to be no mention of these concerns of misleading information, even though the letter and media interview referred to was distributed and conducted by the major landowner. As such I can only assume nothing was done by WEP to address, rectify and make public the fact that the information disseminated by the major landowner was not endorsed by WEP, nor was it correct.

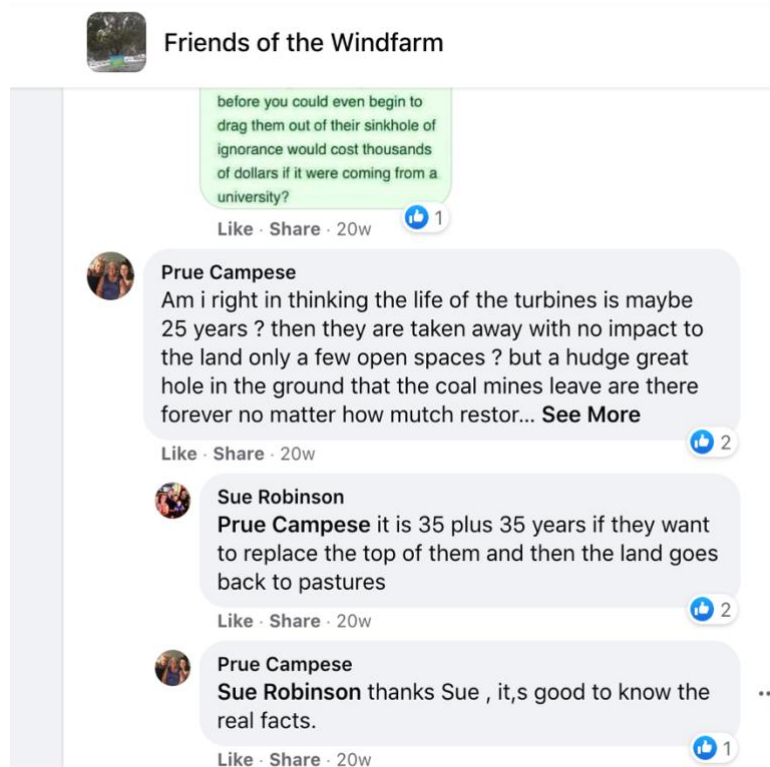
Neither were the aspersions made by the landowner regarding fire-fighting, in the letter, ever apologised for or corrected in the way of facts.

The proponent seems to, by their own words as quoted above, attempt to lump such people as the major landowner into the category: *"vast channels for distribution"*. They state they see *"this as an ongoing responsibility to be aware of information that is being circulated however as is the case with vast channels for distributions we focus on ensuring accurate information is available on our website"*. This is information being distributed about the project by the **landowner in the community** via the Post Office and through media interviews on local radio stations. The "vast channels" were not so vast - they were down the road. WEP has done nothing to dispel the misinformation or to distance themselves from it.

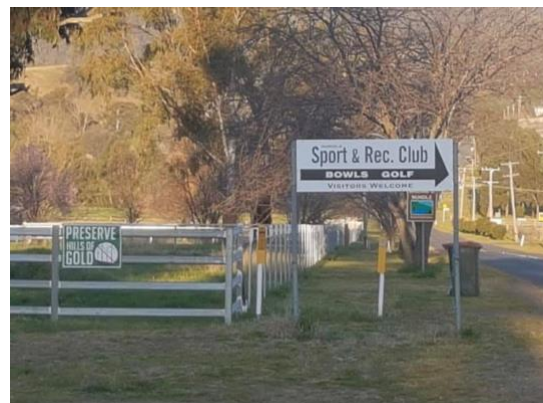
Therefore, it can be concluded that WEP has not been active in the community to monitor and make sure that all information disseminated represents them and the project in all its many complicated aspects especially considering such misinformation has been circulated by the major landowner. In not addressing this issue the result has been that the quality and reliability of information has been tainted. Directing people to their website is not good enough. Many in the community do not even have computers. This is such an important point as community consultation relies on truth and trustworthiness. I believe the proponent had an ethical responsibility to clarify this misinformation for the community and on behalf of their Project – in refusing and ignoring the information presented to them in the CCC they have effectively indulged the rumours and enabled misconceptions to build within the community. (I address this further in my paragraph below)

The "Friends of the Wind Farm" Facebook page has been referenced as evidence of community support (**4.4.7 Support from Community Members, Page 81**). This is a page that has now been sanitised and purged of the derogative language and boorish aspersions some of the members have made there regarding those who are objecting to the project and, in particular, the HOGPI group. (Screen shots are available if required).

If the proponent is to rely on that page as evidence of support, they will need to prove the number of locals who are members of the group (membership 168 to date). In any case the proponent should not be using a Facebook page as evidence at all of community support. There is a Facebook page ("Hills of Gold Preservation - Nundle Hanging Rock and Crawney") that has a following of 1,594 people (to date), local and otherwise, opposing the project. This makes the use the aforementioned Facebook Group as evidence of support meaningless, as the numbers in support cannot be truly quantified especially as they have not been compared to the numbers against on the HOGPI Facebook page. Also, the information content on that page should have been (and be) fact-checked and vouched for by the proponent so that the information presented is fully representative of the facts of the project, e.g. The major landholder's wife (Sue Robinson) answers a question about the life of the turbines and decommissioning: This post was still on the site as at the time of writing this submission (24/1/2021):



Following on, the representation of signs in support of wind farms in the community should not be held up as evidence of community support for the project. In fact, if the proponent was being fully transparent there is an equal representation of signs in opposition displayed within the community. Examples below:



The proponent has not engaged sufficiently with community. There has been nothing done to promote cordial/respectful relations with those against the project. Ignoring the overwhelming evidence of community opposition does not make it go away. I would even go so far as to suggest conduct of the proponent and employees thereof in our community has, rather than helped the case for a wind farm, encouraged many of those in opposition to be even more distrustful and determined to fight the project. One of the employees of the proponent has even reported to a local business owner “they don’t enter businesses in Nundle that have signs opposing the wind farm”.

When consulting with the community on such a life changing, landscape affecting project as a State Significant Project and major engineering feat comprising the transportation of and construction of up to, initially, 98 massive industrial structures on our ridge (1200-1400

elevation) and all the infrastructure and destruction of the environment this will entail, the proponent should have been required to fulfill a mandatory level of consultation overseen by the DPIE more fully and actively than has occurred here. That the proponent has been able to dissemble, evade, misinform, overstate the benefits, allow the major landowner to muddy the water and downplay opposition to gain support is unacceptable. I am sure Timor residents would more than agree with me here considering the completely absent community consultation that has occurred there.

Lastly, and most importantly, ENGIE has had no consultation with the community to date at all. In fact, I had to look up who the proponent was when beginning this submission as I was unsure as to who it would be - WEP or Engie.

First mention of Engie's involvement with the Hills of Gold Wind Farm appeared in the Minutes of CCC - 2nd Meeting on Wednesday 18th September 2019 – Agenda Item 3 – Business Arising from Last Meeting

"Project Announcement - Engie MS and SA presented information on a new commercial arrangement with ENGIE, a French energy company with 103GW of energy capacity installed and over 160,000 employees worldwide (page 11) (attached).. They are a long-term owner and operator of renewable infrastructure and have recently finished construction on the Willogoleche Wind Farm project in South Australia. WEP will remain as Developer for the project and receive financial, technical and commercial support from Engie."

At this same meeting as part of WEP's (Someva Renewables?) PowerPoint presentation, announcing Engie's involvement, it states Engie is:

*"Providing financial, technical and commercial support to WEP to continue HOGWF development and, subject to successful project permits and financial close, **would construct and operate the Wind Farm**".*

Would this not have been an appropriate time for Engie to begin to engage in due process and consult with the community? That they did not begs the question – why not?

Next mention of Engie is at the CCC Minutes of the 6th Meeting on Monday 24th August 2020 – Item 7 General Business I quote in full as it is interesting as regards timing:

"Community Member discussed the Engie / Mitsui media email that was distributed to the CCC on Friday, 21 August 2020 (<https://www.afr.com/street-talk/oh-l-l-engie-sale-flyer-sent-to-investors-20200129-p53vmv>). Could Jamie please give an update on where that's up to please. Is the article accurate? Jamie – confirmed that WEP is still 100% Australian owned and that there has been no transfer of ownership at the time of the CCC. What you read is not an official statement. WEP – To have a look at this Neighbourhood Agreement WEP and member to discuss Agreement implications offline 5 | P a g e Agenda Item Discussion Action/By Whom Community member said that Engie and a Japanese company Mitsui are partners in International Power, which is seeking investors in Australian Renewable Energy which is looking to fund the Hills of Gold proposal and four other renewable projects. Jamie advised that Engie is a partner on this project providing technical, commercial and financial

support. While we hope they make the decision to build the project it would be misleading and pre-emptive to make this statement until the project has progressed further including with the development application and the necessary approvals and internal processes of these businesses.

Community member – so the project will only get build if Wind Energy Partners sells it? Jamie confirmed he's made it clear in public in the past that a large partner with a strong balance sheet would be required to fund the project should it get its approvals. We are proud to be working with Engie on this project but can't make any statements on their behalf."

This indicates even more assurance that Engie would be the eventual owner and builder of the Project. The community at this point was still unaware of who Engie really is. Their non-Australian origins would be of interest to many. Even though Engie (French) and Mitsui (Japanese) have formed The Australian Renewable Energy Trust etc. they still remain entities we, as a community, know nothing about. It not only confuses but also could be perceived as a deliberate deception enacted on the community that has confused residents and landowners and ignored the Clean Energy Council's "Best Practice Charter for Renewable Energy Developments".

I wonder also whether the significant the background history of the community's concerns over the past two and a half year has been adequately conveyed to Engie management?

This brings me to the question why is WEP the proponent? Just asking. I thought Engie was the owner at the time the EIS was submitted.

(I have also outlined my concerns regarding community consultation in the Landscape and Visual Impact area in the following Section "Visual Impact and Amenity")

I would ask that the Department require the proponent show more concrete evidence of the extent of community support they refer to and ask what their response is to the petition tendered to State Parliament showing irrefutable evidence that the majority of residents do not wish the project to proceed. I would also ask why there is no mention in the EIS of this strong, continued objection to the project by the majority of the community nor any mention of HOGPI that has the largest membership of any community group in the history of Nundle and Hanging Rock. I would also ask that the Department give credence to the community's strong opposition. The opposition remains and is not ameliorated by the promises of offsets or mitigation and continues regardless of the technical assessments that have gone into the design.

I would ask also that the Department ask the proponent to show evidence of how they dealt with the dissemination of misinformation by the proponent via notices, media interviews etc. and that the Department evaluate how much such information has affected/contaminated the truth and trustworthiness of WEP's consultation with the community.

In asking the Department to require more concrete, transparent evidence of community consultation, I would like the DPIE to consider the recommendations of the National Wind

Farm Commissioner. He states (2019-2020 Annual Report) “...***the responsible authority should have processes in place to obtain and verify clear evidence of the developer’s consultations with affected landowners and residents and be able to assess the likelihood of strong community support for the project.***”

Community consultation in this particular project was, and is, of a murky, muddying nature and not up to the standard required of a State Significant Project that will have massive, ongoing impacts to our community and our environment.

VISUAL IMPACT AND AMENITY

I will be personally impacted by the sight of these industrialised monstrosities on our ridge as I go about my life here in Nundle. I am insulted with the EIS classifying: “the Scenic Quality Class of the Landscape Character Units as “moderate”, “low moderate” and “moderate high”. Nundle and surrounds have been attracting tourists/holiday-makers/fossickers/campers/bushwalkers and people who have been enjoying the exceptionally beautiful landscape character for decades.

In the EIS (**Appendix F Page 15 4.0 Community Consultation - 4.1Community Consultation Process**) the proponent has significantly underestimated the impact of the proposed 70 turbines placed very closely together on 24km of the Great Dividing Range from Hanging Rock to Crawney. It has also underplayed the scenic quality of the ridge. The landscape, vistas and beauty are considered to be highly attractive and a significant visual resource to the area and the region not only by locals who live here but also by the area's many visitors and tourists who travel here to have a wilderness experience or to simply enjoy their visit in a background of a beautiful landscape.

Page 185 LANDSCAPE AND VISUAL 11.1 INTRODUCTION

The proponent mentions "community consultation" in this section: “The assessment addresses the requirements specified in the SEARs and was completed in conjunction with community consultation.” **Can the phrase “community consultation” be more comprehensively detailed? What community consultation?** There was a Survey I remember. Is this what they are referring to? What about those who have objected to the very presence of these turbines citing visual impact as one of the major issues affecting their decision? Those who do not want them at all may have found it difficult able to answer this survey in a way that was compatible with their view that NO turbines should be built on the ridge. Many therefore may not have returned the Survey. To my mind then this survey was skewed and not evidence of true community consultation. I have looked at **Appendix F Page 15 4.0 - 4.4 Community Consultation** and cannot see any methodology mentioned as to how "community consultation" as regards Landscape and Visual Impact Assessment was carried out.

The Department should require the proponent to support the claims made in all they have outlined in Appendix F Page 15 4.0 -4.4 Community Consultation and require the proponent to give evidence as regards methodology used in this "consulting". To my mind

such consultation was insufficient, lacking in transparency and it would be better to have been honest and said that the majority do not want the turbines at all. The proponent has consistently ignored all those who reject the turbines entirely.

Just as a sidenote I did fill in that survey/questionnaire. I also filled in the section with my name, address and email on the last page that stated *"If you are interested in staying informed about the project, please either complete your details on this form or email them through to mikes@someva.com.au"* but I have never had a word from the proponent at all throughout the whole of the "consultation" process. This Survey was to be returned to Someva by 30th April 2020 - pretty late in the day! It was the only direct interaction with the proponent I had during the whole process of consultation. (I have a copy of that survey if required)

How can the proponent say they have truly consulted with the community on such things as placement of the turbines and visual impact when the **majority** of that community is against them? Objectors don't want to see them AT ALL from ANY vantage point. Consultation would have consisted in consulting "some members" of the community who were not opposed to the project. For the sake of the process some of those against the project felt it necessary to contribute by outlining areas of concern so that montages could be facilitated in the most important vantage points but their overarching feeling, I believe, was that this was only going to support their gravest fears as to the inappropriateness of the turbines on the ridge and it has proven to be so. In fact, in most cases, it is worse than they feared. This whole section is written to give the impression that the community is somehow in favour of the turbines. This is untrue. The community can prove it.

In that same section (**Appendix F page 15 4.2 Community Perception**) the proponent states: *"A CSIRO study published in 2012"....*

Published in **2012**! Yet where are the Wind Farm Commissioners **2019 - Updated 2020 Observations and Recommendations**? This more up to date and pertinent research source is not mentioned at all. We all know why, because the Commissioner has clearly stated that wind farms on ridges can have great impacts on visual amenity.

Page 185 - 11.1.1.1 METHODOLOGY and 11.1.1.2 ASSESSMENT METHODOLOGY

The EIS completely ignores/fails to mention any of the National Wind Farm Commissioners Observations and Recommendations on siting wind farms, particularly about siting wind farms on high elevation. I quote from his 2019/20 findings: *"...NWFC 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."*

Is the Department content to ignore the omission of such important data? After all The Wind Farm Commissioner role is described in the following way on his office website: *"The Commissioner is an independent role appointed by the Australian Government, reporting to the Minister for Energy and Emissions Reduction. The Commissioner's role is to receive and*

*refer complaints from concerned community residents about wind farms, large-scale solar farms and energy storage facilities **as well as promote best practices for industry and government to adopt in regard to the planning and operation of these projects.** The Commissioner will also provide greater transparency on information related to proposed and operating wind farms, large-scale solar farms and energy storage facilities.”*

It is interesting to note that the National Wind Farm Commissioner is quoted elsewhere in the EIS when it suits the proponent's case. From my perusal of the EIS the proponent appears to be "cherry picking" when referring to the National Wind Farm Commissioner and his observations and recommendations. His findings are not relied upon in the much more significant and important matter of siting. This is not acceptable. For example, see the instances below:

The Wind Farm Commissioner is mentioned in the following sections:

Page 335 - 19.3.2 Social Literature Review - Human Health;

Page 129 - Engagement - Wind Farm Commissioner.

Where in the EIS does the Wind Commissioner's observations upon visiting the site appear? It is also interesting to note that the visit to the area was at the invitation of HOGPI not the proponent.

Page 135 Table 7-5 - Key Issues Raised and Project Response - Neighbour Benefit Sharing Program: *"NWFC Neighbour Consultation and Agreements sections on its website - Best practice has been achieved by incorporating the recommendations where possible into the agreements";*

Page 138 - Community Enhancements and Benefits 7.6.3 Neighbour Benefit Sharing Program;

Also, on this section (**Assessment Methodology - Page 85**) the proponent has listed "Temporary" elements of the design. I would consider such things as clearing for buildings/car parking/amenities are not temporary in the case of the environment, even given the revegetation promises - anything that involves clearing is, on the whole, never really the same again. Especially old growth forest – it takes generations for such to regenerate. There is nothing temporary about this development.

Page 224 - LANDSCAPE AND VISUAL - 11.5 CONCLUSION

To describe those who find a large industrial wind farm dominating a ridge something they find objectionable in the following way:

"Although this impact assessment quantifies the visual impact of the proposed turbines, the overall visual impact of the wind farm will vary greatly depending on the individual viewer's sensitivity to and acceptance of change".

To me this statement underplays the deeply held love for a landscape, view, or land, is reductive and insults those who are supportive of change. It is not "change" per se that is at issue. It goes deeper than that and the proponent has, in my opinion, completely missed the point here. This is yet another indication of the proponent's lack of consultation and disdain for the true depth and strength of connection to landscape. I believe also that the word "quantifies" should read "attempted to quantify" the visual impact. There is no possible way that this submission has covered these impacts in a way that could be considered quantified to a satisfactory level. At every stage WEP personnel has given the impression that visually we had no real right to not want an industrialised skyline. That to have that opinion was just a matter of being uneducated on the benefits, not doing our bit for the environment and not open to change per se. Locals know what is up on our ridge. Seeing turbines there would be a daily reminder of the clearing, the loss of habitat, the likely siltation and contamination of our water, the threat to the wildlife etc. The turbines would be so close to some residents as to even threaten their health and livelihoods. Seeing them on our ridge would be an anathema to the majority of local residents who do not want them there. I can quantify that number - over 70% of us.

Also, the proponent 's next sentence in the above Conclusion attempts to compare a visitor's perception to those of a local as a measure of comparable perception. This borders on ludicrous. There is no doubt that perceptions would vastly differ and whilst tourist/visitor enjoyment is very important, it must be said that locals will be the ones living with the turbines day in day out. This is a pointless, meaningless sentence.

MORE SPECIFICALLY:

The EIS also underestimates the number of houses within 4450m-8000m of the proposed turbine placements. Bar charts 3 and 4 (Appendix 1) identify the 42 dwellings and 55 turbines within this **medium visual impact zone**. Is the proponent able to justify placing the majority of the turbines so close to over half of the non-associated homes? In Bar Chart 1 (Appendix 1) 22 homes are identified to experience **high visual impact** (as they are situated 3100m from turbines) and the proponent has indicated in the EIS that vegetation screening could reduce the impact of turbines which would tower 500m above some of them. Can the proponent give evidence that such vegetation screening is capable of effectively reducing the impacts of these towering turbines? Can they also give evidence and justify the need to place so many turbines so closely together? Being so close together (13 turbines are less than 2 rotor diameters from a neighbouring turbine and there are 54 turbines within 3R of another and 65 turbines within 4R of another) their clustering effect potentially creates even greater impact (both visually and via noise and flicker shadow)

The EIS fails to address the visual impacts of roadworks/road widening and all the associated infrastructure work involved in the construction of the turbines on the Range. Could the Department require that the proponent factor into the EIS visual impact studies that incorporate the inevitable scarring that these abovementioned works will have on the landscape's visual amenity?

The EIS fails to address the visual impacts from Nundle notwithstanding that the EIS states "it is possible for the Project to be visible from further than 10 km away". "it is

generally accepted that beyond 10kms visibility is diminished" (Page 193). The EIS actually fails to indicate at what distance they will still be visible. Could the Department require the proponent assess the visual impact of the project from Nundle village and surrounds as per The Scottish Natural Heritage Visual Representation of Wind Farms Estimated Zone of Theoretical Visibility (ZTV) **Page 193 – 11.3.3 Zone of Visual Influence** for a 150m+ wind turbine at 45kms. The size of the turbines at 230m to blade tip and the elevation of the range will no doubt impact visual amenity from a far greater distance than the EIS has indicated. In addition, can the Department require a peer review assessment of the visual impacts.

The visual quality of the landscape will be irrevocably harmed by this development. There will be an appreciable reduction in visual amenity from, not only homes and properties, but also from the roadways and people going about their business on a daily basis.

IMPACT ON THE NIGHT SKY

The night sky will be marred and very sadly changed with the turbines unquestionably being required to have obstacle lighting for safe aviation purposes. Despite the EIS maintaining that the project will not require such lighting, CASA most likely will require these where turbines exceed 150m in tip height as has been the case in other NSW wind farm developments. This is a very significant problem for residents living in sight of wind farm developments especially since the area's pristine and spectacular night sky is a very valued and revered feature of our countryside. Sapphire Wind Farm aviation lighting flashes for 2 seconds on 2 seconds off every night for the life of the wind farm. "Complaints have already been received regarding the aviation lights being turned on at the Sapphire Wind Farm impacting the amenity of the area (23 of its 75 x 200m turbines erected)". From Sapphire Wind Farm Community Consultative Committee Minutes 06/02/2018).

To be able to go out and enjoy a night sky filled with stars is something that is to be treasured and protected in a world that is slowly losing such skies. The loss of this beautiful night sky to blinking aviation lights would, I believe, be a loss which would impact on all residents – even those in the minority who support the proposed development

The proponent has cited the Biala Wind Farm in photos as a comparative study. Biala Wind Farm is not at such a highly elevated location as the proposed turbines in the proposed project and therefore does not provide an adequate comparison.

Page 219 - Night Lighting (cont'd)

I quote:

"Due to the relative isolation of the project area very little existing sources of lighting are present in the night time landscape of the Project Area. Some existing lighting associated with homesteads and motor vehicles is dispersed around the Project Area. Isolated **receptors** within the Project Area experience a dark night sky with minimal light sources. The impact of night lighting is unlikely from inside of a dwelling as internal light reflect on windows and limit views to the exterior at night time."

Goodness me! I would never have thought! But many who want to experience a sky,

particularly at night, would choose to go outside – don't you think? Also, it must be pointed out here, people have gardens, backyards, paddocks and outdoor pursuits that sees them outside their houses at night. In the country you can sit in your backyard and soak the night sky in like a meditation. In fact, people often turn off the lights in their house as well and experience the night sky with curtains pulled back or sit on a verandah. But those of us who do like to spend time outdoors camping, walking and enjoying the black, starlit sky at night are not few and far between. In fact, I would consider that almost everyone I know loves a pristine and bursting night sky far from city lights. A quote that I find illustrates this feeling of pristine dark: *"This was a blackness that I couldn't recall seeing before - one that was absolute. When I tilted my head skyward I could see clearly millions of bright stars dotted on the black canvas of night, yet none of that light seemed to filter far enough down to make any difference when I turned my eyes away."*

The proponent in the EIS in the above section in fact acknowledges what we all know to be true, that an unpolluted night sky is a special and much-loved feature of a landscape. I quote from their cold analysis: "Aviation light has the potential to impact on **receptors** who view the landscape at night. In particular night sky enthusiasts, photographers, star gazers, campers and **some landowners.**" I have used my own bolding here. I would suggest that all landowners and dwellers in our community are **all** of the abovementioned "receptors" and that we will **all** be impacted. In my investigations the intrusion of aviation lighting cannot be successfully mitigated. (And the term "receptor" makes me feel like a machine - even an "ocular beneficiary" would have been better).

Aviation lighting is unacceptable on our ridge. Visually it would be a blight on our beautiful night sky from a vast number of vantage points. The flashing cannot be mitigated as far as I have been able to ascertain and it is with us for the life of the project.

VISUAL MONTAGES

All visual montages have not truly represented the impact. They are abysmal in the extreme. I refuse to critique them - they speak for themselves.

In conclusion I submit the scale of the turbines, roadworks, clearing and infrastructure works are such that the turbines themselves and the associated works will figure large in the landscape in a way that is irreversible and will change the very character and natural beauty of our countryside. These are imposing, industrialised features that do not belong in country that has a significant heritage and ecological value to our nation as a whole and to future generations who deserve the experience they can have to step back in time and to enjoy the natural beauty of a conserved, preserved natural landscape.

These impacts should be very carefully assessed given that they adversely affect many lives, livelihoods and the very landscape itself and should be weighed with the future in mind.

ENVIRONMENTAL CONCERNS

The area to be developed is between Crawney Pass National Park and Ben Halls Gap Nature Reserve is home to a rich assortment of animal and bird life and known to be a corridor for wildlife between these two conservation zones. Ben Halls Gap Nature Reserve, in particular, is listed on the register of the National Estate. In 1991 the NSW National Trust listed it as "Ben Halls Gap Old Growth Forest Landscape Conservation Area" in recognition of its outstanding natural heritage features. The protection afforded this Conservation Area provides an extremely valuable reference area for scientific research and monitoring. And a safe habitat for much animal and bird life. The EIS states that 13 turbines are proposed to be situated along the boundary of this valuable Reserve. The proponent has not indicated how close.

This important and unique **Nature Reserve** is referred to in (Page 21 Appendix F - 5.0 Visual Baseline Study - 5.4.3) as Bell Halls Gap **National Park** whereas the boundary where the proposed turbines are planned to be placed is classified as a **Nature Reserve**. I quote from the NSW National Parks and Wildlife Service. "**National parks** are areas of land protected because of their unspoilt landscapes, outstanding or representative ecosystems, Australian native plants and animals, and places of natural or cultural significance. In addition to their role in conservation, national parks provide opportunities for public nature appreciation, well-being, enjoyment, and as valuable scientific research." "**Nature reserves** are areas of land in predominantly untouched, natural condition, with high conservation value. Their primary purpose is to protect and conserve their outstanding, unique or representative ecosystems and Australian native plants and animals". I rang the NPWS at Scone to find out the exact classification of the Park and found out that National Trust listing in 1991 was for Ben Halls Gap National Park. The area of land that abuts the proposed development is an addition and referred to as a "Ben Halls Gap **Nature Reserve**". As a whole the area is treated as a Nature Reserve. On the DPIE's own website:

(<https://www.environment.nsw.gov.au/research-and-publications/publications-search/ben-halls-gap-national-park-plan-of-management>) is stated "**Ben Halls Gap National Park became a nature reserve in 2016. The plan of management applies to the reserve. The reserve which covers 2,500 hectares, is located at the junction of the Liverpool and Mount Royal Ranges in the northern tablelands of New South Wales. It is 60 kilometres south-east of Tamworth and 10 kilometres from the township of Nundle. There are no public roads which provide access to the park and the park contains no visitor facilities.**"

It is important when references are made in this EIS that the right terminology is used. There is a difference between a National Park and a Nature Reserve. I quote again NPWS website: In Nature Reserves: "*Scientific research is an important objective in nature reserves, as it increases our understanding of their values and provides the information needed to **conserve them**. Nature reserves have few visitor facilities, such as picnic areas, lookouts and walking tracks, and visitation is carefully managed to minimise disturbance.*" To me that makes a Reserve a more pristine, more carefully environmentally controlled area than that of a National Park where "*In addition to their role in conservation, national parks provide opportunities for public nature appreciation, wellbeing, enjoyment, and as valuable scientific research.*" The difference essentially being the stricter control of the areas defined.

The Department should require the proponent check out the difference and to also prove that the project complies with all areas of the Ben Halls Gap **Nature Reserve** Plan of Management (available here <https://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/park-management/documents/ben-halls-gap-nature-reserve>). I notice in other areas of the EIS there is mention of either "Ben Halls Gap Reserve / National Park" or "Ben Halls Gap Reserve". It is therefore important to acknowledge that this project borders on a **Nature Reserve**, and the EIS should be consistent with this terminology and review all mentions of this Reserve to make sure that the differences between National Park and Reserve are reflected within the body and appendices.

In their "Guidelines for Developments Adjacent to National Parks and Other Reserves" The National Parks and Wildlife Service states: *"If the planning authority thinks that the development is likely to have any impact on lands reserved or acquired under the NPW Act, it should: consult with us via the **contact details for the relevant park**; undertake further discussions with the proponent to modify the proposal to avoid adverse impacts on and reserved or acquired under the NPW Act; apply conditions to the planning approval to mitigate adverse impacts; **refuse the proposal if significant adverse impacts remain unavoidable.**"*

There is no doubt that the placement of these turbines will necessitate the Department to thoroughly ensure that all the above criteria has been meticulously carried by the proponent. The mitigation at the moment appears to be insufficient. And, finally, I believe there is a good case to be had to consider the adverse impacts unavoidable.

I request also the DPI organise a site visit to that particular part of the project area in order to ascertain that there have been no encroachments and incursions into the reserve at this point in time as this is, of course, not permitted (National Parks and Wildlife Act 1974 No 80 - **"Division 6 Nature Reserves - 57 Restrictions as to timber, vegetation, plants etc in nature reserves** (1) Subject to section 55 (2), a person shall not fell, cut, destroy, injure, pick, remove or set fire to any tree, timber, plant, flower or vegetation in a nature reserve"

At the southern end the plan is to pack 7 turbines into a very small area creating a kind of wall/barrier that will endanger birds and especially eagles who fly in this area and call the Reserve their home. This is a travesty. The EIS proposes in **Page 161 Mitigation Measures** merely that *"an appropriate buffer must be maintained with the National Park Estate where practicable"*. It is unacceptable that turbines are proposed to be sited anywhere near this important corridor and significant conservation area let alone their assertion that only "where practicable" will they provide an "appropriate" buffer. The Department should value the importance of this National Estate Reserve and not allow **any** turbines anywhere near the boundary or within at least 500m of known areas of endangered and threatened species and habitat. What an "appropriate" buffer in this area is to **not have any turbines** located there at all.

I have personal experience of encountering wild animals and birds, including the majestic wedge tail eagles, on the ridge and in the surrounds of Hanging Rock and to think that their homes and lives are under threat is a thought almost too much to bear. Much of the

wildlife up there is endangered or threatened. There are koalas, whose numbers have been devastated in the bushfires of 2020, that depend on the land remaining untouched. This is totally unwarranted and unnecessary destruction of an environment where animals feel safe to roam across corridors, in the sky and on the ground and whose safety will be savagely destroyed if this project is to go ahead on the land where they have been protected for so long in the past. The Reserve and land adjoining should remain these birds and animals' sanctuary.

This highly important, ecologically rare and special area should require the kind of protection that makes any development that can impact the fragile and exceptional lifeforms living there inconceivable. It is imperative that this land be seen as sacrosanct, untouchable, protected, conserved, preserved and "off the table" to any form of destructive development.

There will also be significantly more land clearing required, hundreds of hectares for the wind farm, transport routes and transmission line that will involve destruction of pre-European native vegetation, old growth trees (including some of the tallest Snow Gums in existence). This is unacceptable in a time when we need to be conserving and preserving our national heritage environments. It is unethical and criminal to be even contemplating this wholesale destructions in the name of "clean" energy. No amount of mitigation or offsets are possible to compensate for this plundering and destruction. I find this whole area of the EIS unacceptable.

ROADWORKS/TRANSPORTING COMPONENTS ETC

Page 236 - 12.4.4.1 Oversized Loads Transportation *"The Project will include the delivery to site of the components of the wind turbines and electrical equipment including among other things: blades; tower sections; nacelles; substation and switching station components; and cabling."*

The movement of heavy vehicles and machinery right past my front door is greatly concerning to me. I live in the middle of the village and will be impacted by the significant increase in traffic in general during the construction period and the idea of the movement of giant turbine blades, equipment and components past my home and through the village is unacceptable. There has as yet been no indication as to what route the transportation of parts and associated heavy vehicle movements will take but any route would be damaging and problematic to those who live in the village and surrounds. The residents will be greatly inconvenienced as we go about our daily lives. Restricted Access Vehicles are notoriously slow moving and I can imagine the time spent behind such vehicles over the long period of construction would make moving about our village and trips in for shopping in Tamworth in our cars a nightmare. There is also the safety aspect that is very worrisome in a village where people are used to ambling around and children, especially, not used to needing to be extremely cautious. The tourist economy is one that our village relies heavily on for our incomes. How many tourists/visitors would want to come to an area to be slowed down by the heavy vehicle movements and the general noise and incompatibility of them? Not many I would vouch.

I am also concerned that the EIS has no modelling of the intersection in the centre of Nundle (Jenkins Street and Oakenville Street intersection). This area is a hub of activity at various times during the day. It is close to the primary school, accommodation, swimming pool, post office and health service as well as the pub and general store. This area is extremely close to my property as well. This is such an integral part of the village and that it has not received any intersection modelling is not acceptable.

The disruption to free movement is unacceptable to me as a local resident and I imagine to other locals and tourists/visitors alike. It would irrevocably change the function and enjoyability of this tiny village. The assessment of traffic impacts cannot be adequately quantified as the changes will be so profound as to be outside of peoples reckoning of the reality. It is remiss of the proponent to imagine that the local residents are willing to have the very fabric and nature of their village so compromised as to be destroyed.

What will happen to our famous Claret Ash trees and various other mature trees throughout the village and surrounds? There is a good chance they will need to be removed to widen the streets. Totally not on!! The route through the village includes very quiet residential streets including, as well as Jenkins Street (where I reside), Herring, Innes, Gill and Point Streets - also Happy Valley Road and River Road. All these have mature trees that add to the amenity and general beauty of our streets.

The EIS (**12.6.3 Road Safety, page 243**) proposes “restricting heavy vehicle movements to daylight hours and avoiding dawn and dusk where practicable”. There seems to be an assumption because we are a small village that we don't have "peak times". One of those peak times is around 12 noon to 1.30pm each weekday. This is the time the mail has been sorted and when most people head to the Post Office to collect their mail. Locals also know that they have to post their mail before 1.30pm as that is the time that outgoing mail leaves the Post Office. Children are being taken to the primary school and picked up at the usual school hours. And from 4.45pm the High School students are arriving home to make their way to their homes in Nundle or catching the local buses to homes further afield. The premise of avoiding dawn and dusk seems to be the time when we are the least busy. Local shops opening hours tend to be 10am-4pm. The idea that by restricting movements to "daylight hours" is in some way being "safer" is dangerously incorrect.

“No parking exclusion zones” are proposed for Oakenville Street and Jenkins Street. This will cause chaos and outrage.

We are living in a quiet, tranquil world at the moment just buzzing along. If this project goes ahead, we will be thrust into a noisy, dirty, dangerous, crowded, slow-moving nightmare in our village and surrounds for the years of construction. Who would want that? Even if you lived in a city. This is an unsafe, unacceptable, intolerable inconvenience that will have to be endured daily for years. It will make life here take a steep dive from idyllic to nightmare.

DECOMMISSIONING

The EIS has not been very forthcoming regarding decommissioning the proposed wind farm. How will this take place? How will the components and associated on-site material be disposed of? What are the obligations of associated landowners in this process? The EIS mentions that agreements with land owners "make express provision for the Proponent's decommissioning obligations." That does not ease my mind or give me any idea of what those obligations are. **Will the Department ask the proponent to outline these obligations so that these important responsibilities are out in the open and can be commented upon properly? What happens if the operators of the windfarm (which could change hands again) become bankrupt or are unable to fulfill decommissioning and rehabilitation requirements?** In my research the obligation could potentially reside with the landowners. How can the community be satisfied that this development will not just rot away on our range at the end of their working life? We need to have this area thoroughly investigated and we need to be reassured as to what is in place to protect us when the time comes for decommissioning. **The Department must require the proponent disclose the landowners' obligations and reassure and outline to the community that an ironclad financial strategy, insurance and bank guarantees exist to protect the community in the case of bankruptcy.**

NATIONAL WIND FARM COMMISSIONER ON LOCATING WIND FARMS

National Wind Farm Commissioner 2017: Annual Report - Updated Observations and Recommendations

Observations {Page 44}

8.1 Site Selection

"There may be opportunities to select and prioritise wind farm projects, from the current pipeline of wind energy generation projects, which better balance the likelihood of acceptance of the project by the surrounding community. Meeting the 2020 goals of the Australian Renewable Energy Target scheme would require approximately only one in three of prospective wind farm projects (on a capacity basis), based on data provided from the CEC and the Clean Energy Finance Corporation, to go ahead. There is therefore an ability to select wind farm projects that meet other key parameters, including economic and regional development goals, while also optimal from a community impact site-selection criteria."

National Wind Farm Commissioner: 2019 Annual Report - Commissioner's Observations and Recommendations (updated 2020) {page 55}

8 Site Selection

8.1 Observations

Background

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.

Optimising Site Locations

There may be opportunities to select and prioritise wind and solar energy projects in the current pipeline based on an increased likelihood of acceptance of the project by the surrounding community. With the increase in development and construction costs, the ongoing grid connection issues and the declining value of large-scale generation certificates, not all projects in the development pipeline are expected to go ahead. There is an opportunity to select projects that meet other key parameters, including economic and regional development goals, while also selecting sites that are optimal from a community impact perspective.

8.2 Recommendations

8.2.3. Prospecting for new wind and solar farm development sites could be subject to an 'approval to prospect' requirement issued by the responsible authority before formal prospecting commences. The approval to prospect a specified potential site would be granted on a range of criteria, including the suitability of the proposed site, alignment with the State's renewable zone strategy, transmission capacity as well as the credentials of the developer and key personnel. See also Recommendation 1.2.9.

8.2.4. As part of the assessment suggested in Recommendation 8.2.1, the responsible authority should have processes in place to obtain and verify clear evidence of the developer's consultations with affected landowners and residents and be able to assess the likelihood of strong community support for the project.

8.2.7. State governments, in conjunction with the appropriate Australian Government departments/agencies and the Australian Energy Market Operator (AEMO review current and planned transmission infrastructure to ensure it allows for new large-scale renewable generation facilities to be connected in the most optimal locations for renewable resources. AEMO's Integrated System Plan has identified a number of potential renewable energy zones that provides insight and direction transmission planning.

I have quoted above from the National Wind Commissioner, Mr Andrew Dyer's Annual Reports of 2017 and 2019 (Updated 2020) as he specifically observes that locating wind farms on ridges impacts on the residents of the valley and surrounds both in visual amenity, noise and shadow flicker.

More significantly in his 2017 Annual Report he observes "**Meeting the 2020 goals of the Australian Renewable Energy Target scheme would require approximately only one in three of prospective wind farm projects (on a capacity basis), based on data provided from the CEC and the Clean Energy Finance Corporation, to go ahead.**"

To me this observation completely takes this proposed project off the drawing board. The conclusion is drawn that there is scope for wind farm projects to be sensitively sited. There is no desperation. Ridges that overlook valleys, that are stunningly beautiful features in the landscape should be sacrosanct and deemed to be untouchable when there are better,

more viable and more easily accessible sites to be "prospected". The elevation, the closeness of the proposed turbines to unique and irreplaceable flora and fauna requires those who adjudicate this project to trust in people like the National Wind Farm Commissioner and his well-considered observations and recommendations. Only one in three need to be approved – therefore they can be sensitively sited. They do not have to be sited in an area that should be considered part of our national heritage. There is no need for the "green" push on this. We can be even "greener" by preserving that ridge, the transmission line route and heritage landscape and our lifestyles whilst still advocating for clean energy solutions. We need to be vigilant and strong in our commitment not to destroy the environment to save the environment.

The Commissioner also points out the need for strong community support. It is recommended that the Department should obtain very clear evidence of this and I have already made reference to this issue above in my Community Consultation paragraphs. He mentions the *"State's renewable zone strategy"* and *"potential renewable energy zones"* are the most optimal areas for the locations of wind farms - the proposed Hills of Gold Wind Farm is not in one.

He also mentions "an approval to prospect" could be a way to ensure that there is prior approval before formal prospecting commences. This approval to prospect would ensure that proposed wind farm sites fulfill certain required criteria which would do away with the present "Wild West", gung-ho style of prospecting that the Hills of Gold Wind Farm proponent has followed.

I consider it extremely important in the consideration of this proposal that the DPIE follow The National Wind Farm Commissioner's recommendations regarding community consent especially: *"the responsible authority should have processes in place to obtain and verify clear evidence of the developer's consultations with affected landowners and residents and be able to assess the likelihood of strong community support for the project."*

CONCLUSION

There are very many other issues that have required detailed and comprehensive study of the EIS and the executive of HOGPI are representing my views and objections in the submission they will be presenting, including but not limited to, water, soil, bushfire, aviation, tourism, budget, blade throw, hazardous materials, aboriginal heritage, waste, socio-economic impacts, community enhancement fund and traffic. They cover the areas contained in my submission in more detail as well.

In conclusion I would reiterate that this is categorically the wrong location for a wind farm. I support renewable energy solutions but at the same time I believe it is our duty to preserve our wild and semi-wild places and heritage for future generations. We should also take care of and appreciate the communities that are the present caretakers of such places. It feels as though we are at the precipice of calamitous climate events due to global warming, therefore it is essential that we, as a community, a nation and as world citizens understand the importance of respecting, preserving and honouring our wild and semi-wild landscapes and ecosystems. If in becoming "green" and advocating for "green solutions" you at the

same time can, for the sake of a commodity, destroy these soon to be rare areas you are contributing to the climate problem. Trees breathe in carbon and breathe out oxygen. Do not cut down trees if you are "green". The door that has been opened to exploit our countryside is a "fake green" one. One where developers seem to be able to lead people down a path where they can come to reductive conclusions such as the one I have often heard over the last two and a half years - that this particular wind farm proposal is better than a coal mine on the ridge and therefore it is "green project". You cannot flout "green" credentials, as many who support wind farms do, and at the same time condone wanton destruction. I quote from writer, poet and former deputy editor of The Ecologist Paul Kingsnorth to put it more succinctly than I can:

".....This is business-as-usual: the expansive, colonising, progressive human narrative, shorn only of the carbon. It is the latest phase of our careless, self-absorbed, ambition-addled destruction of the wild, the unpolluted and the non-human. It is the mass destruction of the world's remaining wild places in order to feed the human economy. And without any sense of irony, people are calling this 'environmentalism'."

I also would mention here how much I appreciate living in an environment where the existing landscape contributes to the reduction of greenhouse emissions, where endangered animals still survive, where the mountains contain a capacity to hold water in a giant sponge based on its topography and undisturbed geology, where just on my doorstep there is a Heritage Listed, scientifically renowned Nature Reserve, where there is a harmonious combination of pre-European heritage, Gold Rush heritage and the heritage of vistas and views dating back to the 19th century. This country is where I can feel as though I am part of and belong to an ecosystem where rivers, trees, a mountain, birds, animals, vegetation, heritage and community has knitted itself into a unique, strong and fabulous garment, with a great Australian personality and with the ability to withstand any threat, be that man-made or natural and with fortitude and pride in our specialness stand up for it, defend it and speak for it and say **NO!**