



HILLS OF GOLD WIND FARM – SSD 9679

Submission by Susie Hooper

28 January 2021

## Objection

I am not opposed to the creation of wind farms in general; in fact, I believe they're necessary so Australia can shift from its reliance on fossil fuels to renewable sources to generate energy, but I object to many aspects of the proposed Hills of Gold Wind Farm.

I worry that the development will greatly change the character of our beautiful local area with the proposed road upgrades, the loss of wildlife corridors, the visual intrusion of the turbines looming over the valley & it's residents, the risk of loss to the local tourism opportunities and the creation of a thoroughfare to the Industrial scale Wind Farm. I worry that the impacts on flora, fauna, waterways and the Hanging Rock amenity will all be irreversibly and negatively impacted.

The following highlights concerns I would like to raise for further consideration regarding the assessment of the proposed development.

## Introduction

I have the great privilege to have become a local after purchasing a property along Morrisons Gap Road with my Husband in 2016 with the vision of building our dream home & to create a long sought-after idyllic lifestyle. Our property was part of a subdivision approved in the 1970's which created a series of lifestyle Lots that are surrounded by high altitude native bushland and some grazing land. My husband's parents built their family home on the property next door and were the first to do so in the subdivision. My husband fosters a great sense of place having grown up there and my constant amazement at the natural beauty & biodiversity of the area is what drew us to investing in the property.

I appreciate that living in the area comes with a certain degree of disturbance from other existing local land uses. We have had consent to build a dwelling on our property since purchase and so we forged ahead and obtained all the relevant approvals and commenced construction. We have now stopped construction as we are so unsure about the impacts that we'll be faced with from having a wind farm on our doorstep. An Industrial Wind Farm next door was certainly not what I had anticipated would be the primary disturbance to be contended with in our area.

I have been repeatedly encouraged by the wind farm proponents, host landholders and my peers to consider "the greater good, the bigger picture, no one likes a NYMBY". Initially I think I agreed with them. Nevertheless, I'm at a stage now where the proponent has lodged their Environmental Impact Statement (EIS) for exhibition and I've learnt a great deal more about the extent of their proposal and details which appear to have been filed only to be retrieved when the right questions were asked or when legislation required it to be released.

I have spent countless hours reading the thousands of pages of documents to better understand what the proposal actually entails. Disappointingly, I've discovered that the EIS is lacking in factual information but contains plenty of baseless claims such as the provision of local jobs, yet when asked for a list of those jobs the request was often glossed over with no information provided.



Morrison's Gap Road should not be the main access route to the Hills of Gold Wind Farm



*Photo by Susie Hooper 2020, Morrison's Gap Road adjacent to our property*

The proponents plan to upgrade our beautiful quite country road, Morrison's Gap Road, and use it as the main access route to the project Site. Many of the associated reports use the term "improved" to describe the proposed works to the road for transportation of large scale industrial wind farm components by "widening [to] 5.5m width and widening on bends, clearing vegetation on bends and sealing..." EIS, Appendix G.



The road upgrade was promoted to the locals as just being sealing works to reduce dust and improve safety implying that was what the community wanted. What they failed to disclose to the community in consultations was that sealing the road would involve a great degree of alteration to the width and character of the road, a large amount of tree removal and excavation work, all of which is outlined in EIS Appendix G.

As one of the community members directly effected by the road upgrade, I had no direct discussion with the proponents as I would have raised my concerns at that point. It was not until October 2020 that the proponent emailed my husband a letter seeking “land owners consent” to lodge a DA so the road could be upgraded. They sought our consent without providing any detailed information about what the “road upgrading” might involve, even though it clearly involved our property (the traffic and transport route assessment reports were not available at that point in time).

Below is an example of road improvement that took place along Morrisons Gap Road in 2020. It’s a little unclear if the new road is a private road or is the extension of Morrisons Gap Road? It should be noted that these two photos are not the same section of the road but are within proximity to one another. I think it is also relevant to ask the question – has this road upgrade been carried out to facilitate entry to the windfarm? Is this what we can expect in terms of tree removal and excavation along all of Morrisons Gap Road?



Morrisons Gap Road BEFORE road widening



Morrisons Gap Road AFTER road widening

*Photos by Susie Hooper, 2020*



Having grown up on a cropping and grazing farm in a remote area, I can fully appreciate that when living in a rural area there will be disruption from various operations which is relatively a short-lived disruption. Agricultural land use activities and residences are often found to be compatible and coexist without the need for any “mitigation”. What is of great concern to me is the construction and operation of the proposed \$826 million Industrial Wind Farm on the adjacent property with the constant disturbance it will bring, especially should Morrisons Gap Road become the main access route.



*Morrisons Gap Road beside our property, Photo by Susie Hooper 2020*

The Transport Route Assessment prepared by Rex J Andrews (EIS, appendix G) spells out in great detail the procedures and constraints of the route options for transporting all major wind turbine components from the Port of Newcastle to the Farm. The report details two route options from Nundle:

1. Option 1 uses the Head of Peel Road from Nundle and
2. Option 2 uses the Morrisons Gap Road.

Option 2 is comprehensively detailed with swept path diagrams (see following) and comments for the route from Nundle to the Barry Road / Morrisons Gap Road Intersection ONLY. It fails to detail the 3km of Morrisons Gap Road leading to the entrance of the project which contains many bends in the road that are sure to be problematic for the vehicles intended to use the road (and are the reason for the proponent seeking owner's consent to encroach their land – see following chapters). There are 14 freehold property owners and 11 residences which will be impacted along this 3km of the road, not to mention the unique flora and fauna. Morrisons Gap Road is used as a wildlife corridor for the bustling populations of many native animals.



**PROCEDURE:** Right hand turn from Barry's Road onto Morrisons Gap Road.

*Page 150, Transport Route Assessment (EIS, Appendix G)*

**Image 3:**



**PROCEDURE:** Travel directly ahead on Morrisons Gap Road.

*Page 153, Transport Route Assessment (EIS, Appendix G)*

Perhaps failure to document this part of the route may be because the report states the following:

*“Out of both options, option 1 in our opinion is the only realistic route out of both. Option 2 we deem as high risk and does not have the capacity to take the towers even if the blades could be transported in a lifter. Option 1 still requires an extensive amount of work but is more realistic” (EIS, Appendix G, p.159)*

The Traffic Study prepared by TTPP (EIS, Appendix G) has outlined the proponent’s intentions of using Morrisons Gap Road as the preferred option for access of workers, plant equipment & materials, transportation of water and transportation of construction materials on trucks. The expected Traffic generation (trips) from this includes 130 light vehicles, 22 Water Trucks & 40 Trucks per day, with these figures further increased at the peak construction period. During the Peak Operational Period, the report estimates up to 66 light vehicle and 8 heavy vehicle trips per day. In addition to these numbers are the anticipated oversized load movements.



There is no mention in the reports of what the current traffic numbers are along Morrisons Gap Road, however from my association with the area, I am confident in my estimation of there being 20 traffic movements a day on average. So the anticipated traffic generation numbers in the report suggests there will be a staggering increase to what is currently experienced for both the construction phase and during operation of the wind farm.

As well as the adverse impacts to people living beside Morrisons Gap Road, the disturbance to the flora and fauna seems to have been somewhat overlooked. My experience with using the road indicates that it is obviously a busy wildlife corridor having had encounters with wombats, wallabies, echidnas, birds, bats, sugar gliders & lizards. Well established locals have also mentioned to me that they've seen much rarer quolls and lyrebirds along the road at times. Animal fatalities along the road with its current traffic volumes appear to be low, perhaps due to the low volume of traffic? But with the proposed road upgrade and dramatic increase in traffic movements, would it not be reasonable to expect that there will also be an increase in animal fatalities? Or will the road be changed so much that it will prevent animals crossing?



*Deceased wombat on Barry Road near Morrisons Gap Road intersection, Photo by Susie Hooper 16.01.2021*

EIS Appendix D, Biodiversity Development Assessment Report (BDAR), states that a desktop review was carried out and based on the information sources, sites along the transport corridors were ranked from low to high risk. Each rank depending on the likely presence of native vegetation communities and potential habitat for threatened species. Barry Road, including the section containing the Devils Elbow and Morrisons Gap Road were determined to be High Risk. The Head of Peel route has been identified as being Low to Moderate Risk.

Appendix G of the EIS indicates that the preferred transport route along Barry Road contains a troublesome obstacle known as the Devils Elbow which includes sharp hairpin bends with a considerable change in elevation. The mitigation measures for traversing this section of the road is to construct a diversion around it with a private road through the Hanging Rock State Forest (which happens to be contain well known cultural and heritage items such as the black snake mine) to go around the obstacle.



As the Rex J Andrews Transport Route Assessment report (EIS, appendix G) recommends, the main access route should be **Option 1** which is along the **Head of Peel Road**:

*“Option 1 still requires an extensive amount of work but is more realistic. The access from Kirks Road through to the site access roads would need to be made suitable for the largest loads.”*

The traffic routes information provided, and lack of comprehensive information has completely eroded any optimism or confidence I have in believing that works will be undertaken sensitively with particular regard to the environment and social impacts. I offer no apologies for the harshness that the above photo may present to some readers, it depicts the consequences of using Barry Road.

## Placement of Wind Turbines



In a report published on the clean energy council's website titled "enhancing positive social outcomes from wind farm development" is the following excerpt:

*The placement of turbines and their physical influence on the landscape can also influence opposition, resulting from impacts on both the actual view, and the sense of place. Groth and Vogt (2014, p.7) found that "turbine placement close to residents may heighten their uncertainty and concern of the wind turbines and overshadow any positive inclinations towards the development". In Australia, researchers found that perceptions of "spoiling a sense of place is a primary cause of enduring social conflict" (Hindmarsh, 2014, p.194).*

Throughout consultation with the proponents we have made it very clear that the placement of the six closest turbines to our property is of great concern, not only to us but to others in the neighbourhood (together with the use of Morrisons Gap Road).

It was during one of these discussions with the proponents that they stated, should our request be granted to have turbines removed then we would be known as the people who caused the adverse effects to others financial gain. It was at this point that the erosion of any positive inclinations towards the project really started to set in.

As has been the case from when we were advised of the placement of the wind turbines, I would like the Turbines numbered WP 65 to WP 70 to be removed.



## Social Impacts

It is with immense frustration that the SSD Assessment process allows a Socio-Economic Impact Assessment to be carried out for consideration of the approval prior to the lodgment of the EIS. I understand that some kind of an assessment /guesstimate is required to be included in the EIS but how can interviewing 11 people from the community result in any kind of accurate indication of how the community feels about the project and then imply in a report that there is majority consensus for the project to go ahead?

I have lost count of the number of times I have been put on the spot and asked “so, do you support the wind farm?”. I ask the question – how is it possible to make an informed decision without the majority of the information available? We have made it abundantly clear with each interaction with the proponents that this was the case. It seems that our sentiments may have been misconstrued as indifference to or even more alarmingly support for the project as their contact with us has diminished to almost none.

We have also experienced social pressure from peers who have pointed out that being so close to the wind farm that would we not receive financial benefits? I suppose that would seem like a fair question to most people. It seems to be the number one subject that arises when discussions turn to the wind farm, whether it’s the community enhancement fund or neighbour benefit agreements. The proponents market these financial offerings as benefits. The word “benefit” is a gross misrepresentation what it actually is. It’s compensation for having an industrial scale wind farm constructed next door and all of the disturbances that come with it, whether that be physical or mental, the fact that something is offered indicates that there is something to compensate for.

From the moment that the “Transport Route Encroachment Consent” letter was sent to us, it was made very clear by the proponent that it was very important that we sign it prior to the submission of the EIS. Would that be because it indicated that we were supportive of the project or was it a requirement for the lodgment. Who knows? it was another question that was never answered intelligibly by the proponents. Being very cautious about what the agreement was imposing on us, we decided to seek legal advice at our own expense and again our time.

I have also had to endure comments from peers that my objection to the wind farm paints the picture that I’m being a bit of a NIMBY. The derogatory term used to characterise a person who objects to development and is motivated by personal selfishness. I am campaigning for the protection of the environment, social cohesion and the unique heritage, and cultural aspects of our community. If that is being selfish then I will wear that NIMBY badge with pride.

The Socio-Economic Impact Assessment makes mention of the “Friends of the Wind Farm” group and has included two photos of signs which are displayed in the area indicating their support. What I find exasperating and misleading is the complete disregard to mention the group called “Hills of Gold Preservation Inc” who have existed from at least the time that the wind farm became public knowledge. Is failure to acknowledge both sides of the debate arrogance, incompetence or laziness? A quick drive around Nundle & Hanging Rock will reveal that there is substantial opposition to the wind farm, see images following, taken 17<sup>th</sup> January 2021.





Photos by Susie Hooper, Nundle & Hanging Rock 2021



## Biodiversity Impacts

On a slightly different matter not relating to the transport routes but extremely relevant to the research conducted in order to prepare the BDAR, is the timing at which the field studies were conducted. Clause 5.3 Candidate threatened species and targeted survey methods presents a summary of field survey methods. The Summary includes the dates which the field surveys were conducted. The surveys were conducted over the months of August 2019, November 2019 and February 2020. Clause 5.3.3.2 Nocturnal bird surveys and spotlighting states that call-broadcast surveys aimed to detect small macropods, owls and arboreal mammals was conducted August & November 2019 and March & May 2020.

Over the last couple of years NSW has experienced its worst drought on record. Information available from the Department of Primary Industries states that from 1 June 2017 to 29 February 2020, the majority of NSW experienced drought conditions for longer than 24 months. There have also been Bushfires in the area.

Since the last field studies in 2020, there have been widespread rain events in the Hanging Rock area which have transformed the landscape into what I imagine is getting closer to resembling what the area actually looks like with the addition of the average annual rainfall. My personal observations of the Hanging Rock area indicate that plants such as Pepper Bushes, Tree Ferns, Lichen and many birds have all started to flourish in ways that I haven't seen in the area for some years. I consider the findings of the associated surveys to be an inaccurate representation indicating lower numbers due to the effects of the prolonged drought conditions. The BDAR acknowledges that drought (and bushfire) conditions were encountered, however is it appropriate to be making assumptions for conditions that historical records indicate have never been encountered in the area.



*Land adjacent to Morrisons Gap Road on Eastern Side, Photo by Susie Hooper, August 2020*



## Summation

I am not opposed to  
wind farms.

We need renewable energy  
sources for a  
sustainable future.

Wind Farms might  
be better accepted with  
evidence of innovative  
practices in avoiding  
detrimental environmental &  
social impacts.

Mitigation is a term used for  
when it's too late.

Don't save the Environment  
at the expense of our  
Environment.

*Photo by Susie Hooper, Morrisons Gap Road property, 2020*