DAG SHEEP STATION – Submission for Objection

INTRODUCTION

The DAG Sheep Station (The DAG) is located on the Crawney Road, alongside the Wombramurra Creek, 10km south of the village of Nundle and is represented in the EIS as a Non-Associated Dwelling (NAD) 34.

The DAG Sheep Station is a licenced Tourism Venue hosting Weddings, Functions, Corporate Events & Events, located within Tamworth Regional Council and consisting of 30 ha at an elevation of 670 m, the complex consists of the original 120 year old, Wombramurra Woolshed, Workers Cottages, Shearers Quarters, Mess Hall and owners Homestead and provides accommodation for up to 88 guests.

The DAG hosted over 100,000 International travellers between the years 1995 and 2003 when operating in partnership with Oz Experience.

The current owners John and Belinda Krsulja purchased The DAG in 2007 and undertook extensive renovations to transfer the Complex into a unique Award-Winning Venue.

Over the last 13 years The DAG has hosted over 160 Weddings, and 100's of Functions & Events contributing to the growth of employment and tourism currently enjoyed by Nundle.

The DAG has consistently employed between 5-12 locals and attracts 1000's of visitors annually, hosting between 40 to 60 Functions of 80 to 100 guests at an average of 2 night / stays, equating to over $1.8 million dollars annually towards Nundle and Tamworth's economy. *Base on Destination NSW Regional average night / spend of $191.

The DAG Sheep Station is also the base and office used by The DAG Sheep Station's proprietor John Krsulja for his Plastering & Gyprock Fixing business, PLASTERMAN, established in 1995 and servicing the Tamworth Region & surrounds.

PLASTERMAN currently employs 6 full time staff, including 2 Adult Apprentices.

TOURISM CONTRIBUTION & AWARDS

Over the last 13 years The DAG Sheep Station has worked alongside Nundle Businesses to help create, establish and operate the NBTMG (Nundle Business Tourism Marketing Group).

The DAG Sheep Station has previously worked with and continues to work with; Tamworth Tourism, Destination Tamworth, Destination NSW, Inland NSW Tourism, Tamworth Business Chamber, North West Weddings, T-Qual, Australian Defence Force Reserves, APRA AMCOS and Country Music Association of Australia (CMAA).

Awards Won include: • Tamworth Regional Biennial Heritage – 'Heritage Tourism' • Tamworth Business Chamber Quality Awards – 'Outstanding Pub/Club/Licenced Venue'• NSW Tourism Awards – Silver & Bronze 'Unique Accommodation'• Inland NSW Tourism Awards – 'Tourism Restaurant & Catering' x 2 years • Inland NSW Tourism Awards – 'Unique Accommodation' x 3 years • Inland NSW Tourism Awards – Inducted into Hall Of Fame 'Unique Accommodation' • North West New England Wedding Awards – 'Boutique Reception Centre' x 2 years • Tamworth Regional Sustainability Community Awards – 'Rural & Hobby Farm' • 3 x songs written at The DAG during Songwriting Retreats have been awarded CMAA Golden Guitars.

DAG SHEEP STATION CONCERNS OF THE PROPOSED WIND FARM

In assessing the concerns of the project, it is certain the Department will consider the environmental, social and economic impacts of the project, submissions on the EIS, the suitability of the site for the project, and the public interest, in accordance with the requirements of the EP&A Act.

The DAG Sheep Station strongly suggests and recommends the NSW Department of Planning Industry & Environment audits Wind Energy Partners /Engie's Proposal against the 2019 Wind Commissioners Recommendation Report.

While a broad range of issues will be raised in public submissions, the key concerns of The DAG Sheep Station relate to:

1. Site Selection & Site Suitability

2. Visual Amenity Impact

3. Aviation Night Lighting

4. Impairment of Landscape to Build Access Roads & Impacts of Transmission Lines

5. Social & Economic Impacts

6. Bush Fire Risk & Safety

7. Tourism VS Renewable Energy

Image: A Bride & Groom overlooking the range and backdrop to the DAG Sheep Station, Wind Turbines 1 – 8. The DAG Sheep Station brings 1000's of visitors to Nundle and contributes over $1.8 million to our local economy annually.

1. SITE SELECTION & SITE SUITABILITY

The National Wind Farm Commissioners 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…"****.*

The Clean Energy Best Practice Guidelines;

"A broad assessment of site access constraints should be carried out. In particular, elevated sites are often only accessible by narrow roads with sharp bends, which may make transportation of long wind turbine components difficult. Gradients and dips in access roads may also be critical in determining suitability of equipment such as low-loaders for large plant transportation. Further, many areas of Australia that are suitable for wind farm development may only be accessible by dirt roads. The suitability of such roads for the heavy loads associated with wind farm construction and ***seasonal constraints such as potential for flooding*** *should be considered.* ***Site selection should also consider the ability to provide, at the location of each wind turbine, a hardstand and flat lay-down area*** *to position heavy lift cranes and pre-assemble turbine blades".*

EIS - APPENDIX B CAPITAL INVESTMENT VALUE REPORT;

"We have made the following assumptions / inclusions in the preparation of our Capital Investment Value Estimate: Project Specific 1. We have excluded a construction contingency sum, which is generally between 10-20%. This should be allowed elsewhere within the budget; 2. Assumed excavation in material other than rock ***(NB: No Geotechnical Report provided)****; 3. Assumed existing ground levels for crane hardstand areas are level; 6. Allowed for 115m wide x 60m long x* ***200 thick crushed rock hardstand crane pads****; 7. Allowed for 20m wide x 20m long x* ***2m deep*** *reinforced concrete pad footing to wind turbines;…"*

"Within the following Capital Investment Value Estimate the acronym 'EXCL' means work that has not been included in our estimate. We specifically note the following exclusions from the estimated cost: 13. Treatment / disposal of unsuitable or hazardous material; 19. Groundwater control; ***23. Excavation in rock;*** *26. Roadwork to Morrisons Gap Road excludes* ***any subsoil drainage, table drains or swale drains****; 27.* ***Roadwork to existing roads used for the route from the port to site****; 29. Tree removal other than allowance noted in foregoing estimate; 31****. Revegetation;…"***

EIS - The LSC mapping identifies a large variation in Classes mapped across the Project Area, as shown in Figure 16-2.

The north and west facing slopes of the Project ridgeline are attributed the highest limitation class, being assessed under the LSC scheme to be rated Class 8, having extreme limitations. ***Class 8 land includes precipitous slopes (>50% slope) and cliffs or areas with a large proportion of rock outcrop (>70% area). Recommended uses are restricted to those compatible with the preservation of natural vegetation including water supply catchments, wildlife refuges, national and State parks, and scenic areas.***

1.2 Conclusion

There is no Site-Specific Wind Data provided within the EIS, potential flooding has not been accounted for in the EIS and the development proposal clearly sits outside of the State's REZ and not aligned with the NSW renewable zone strategy.

Although GPS co-ordinates have been provided for each of the Wind Turbine Footings in the EIS, no Geo-Technical data has been provided that is Site-Specific to the Hardstands, Footings and flat lay-down areas, especially considering the steepness of the ridgeline and the Class 8 soil.

It is also worth noting the Capital Investment Value Report holds 33 exclusions and assumes the hardstand areas are flat, excavation is in material other than rock and no groundwater control among so many other exclusions adding to the suggested $826 million, making this an expensive project generating up to 420 megawatts compared to other renewable developments providing the same or similar megawatts.

Inclusions for hardstand crane pads and concrete pad footing to wind turbines use incorrect depths.

It is evident that the site is not suitable for a large-scale wind farm, and that the project is not in the public interest, and should not be approved.

Image: The HOGWF proposal sits on range at 1200-1400 metres above sea level, in comparison to Sapphire Wind Farm at Glen Innes elevation of 750 to 1100 metres above sea level and for height comparison the Blue Mountains in Sydney at 1200 metres above sea level.

2. VISUAL AMENITY IMPACT

The National Wind Farm Commissioners Observations;

Based on our complaint handling experiences, the Commissioner has found ***that locating wind turbines on the top of hills or ridges, while optimum for capturing the wind resource, can have greater impacts on visual amenity,*** *may lead to specific noise and shadow flicker scenarios for residents in the valley beneath and may have other dislocation impacts on the community.* ***Access roads for hill and ridge wind farms can also be obtrusive and significantly damage and constrain the remaining available farming land in the area.***

Conversely, there appear to be minimal issues raised to date about wind farms that are located on large land holdings, or on flat or slight to moderate undulating land and sites that are well away from neighbours and towns (noting comments made earlier regarding landowner and neighbour agreements in subsections 1 and 2).

The Clean Energy Best Practice Guidelines;

3.1.2.3 Landscape values; ***It is important that proponents obtain an early appreciation of the landscape values of a site and its surrounds. Early dialogue with the community and interest groups will enable the proponent to be aware of the local landscape values that members of the community and special interest groups hold****. A detailed framework for landscape values assessment was developed by Auswind in partnership with the Australian Council of National Trusts, outlined in Appendix 5.*

The Wind Energy Guidelines for SSD

*Visual impacts****: the height, scale and mechanical character of wind turbines creates an unavoidable level of visibility and contrast with the natural environments in which they are situated. This can alter the character of the landscape and people's enjoyment of the landscape****. The consent authority will give consideration to the acceptability of impacts on landscape values and the amenity of landholders and communities, and the adequacy of the measures which are proposed to avoid, reduce or otherwise manage these impacts, having regard to the Visual Assessment Bulletin;*

Visual Assessment Bulletin

In the final phase, the Department undertakes an assessment of the project against the visual performance objectives and considers the acceptability of the project, ***including the adequacy of mitigation and management measures.*** *The consent authority will determine whether the project should be approved on its merits by considering the broad range of social, environmental and economic considerations applying to each project, and the broader public interest 2.* ***This will include consideration of whether the project could be approved subject to conditions that will mitigate impacts to an acceptable level.***

EIS - Table 6-6 Wind Farm Provisions from the Upper Hunter DCP 2015

"Design Guidelines - Ridgelines dominated with wind turbines will not be favoured"

2.2 Conclusion

The project would result in unacceptable visual impacts on the existing use of the range for tourism visitors locally, regionally, nationally and internationally.

The distinctive feature of the landscape compared to sites for other wind farms is the topography and height of the ridgeline which dominates the skyline and provides the landscape character, for not only visitors but all agricultural landholders, lifestyle landholders and residences in the local area.

Given the nature and extent of the visual impacts, it would be considered that vegetation screening as a mitigation measure is unlikely to be effective or practical in reducing the visual impacts to acceptable levels, and it should be noted the high level of non-associated neighbours and landholders surrounding the proposal and the failure of WEP to secure negotiated agreements to accept the visual impacts of the project.

The potential visual impact of the project would be unacceptable in regard to both the public and private domains.

The site is not suitable for a large-scale wind farm, and that the project is not in the public interest, and should not be approved.

Image: The range and backdrop to the DAG Sheep Station, Wind Turbines 1 – 8 & Transmission Lines, The DPIE must ask that Wind Turbines 1 – 8 be removed from the DA.

***As a business owner there has been no recognition within the EIS of true impacts with regards to The DAG Sheep Station, and although as the owner I have also taken the role of Hills Of Gold Preservation Inc President, I have always represented the members and the majority of the community who oppose this development proposal.**

There is no mitigation or compensation or offsets that will satisfy our members, nor will these promises satisfy my family business, in short if this proposal was to be Approved and constructed, The DAG Sheep Station would close it's doors and we would simply move away.

3. AVIATION NIGHT LIGHTING

EIS - 11.3.9 Night Lighting

Night lighting of turbines and associated infrastructure has the potential to extend the visual effect into the night time. Aviation hazard lighting has the potential to be visible from distances in excess of 20 kilometers (Scottish Natural Heritage).

As the requirement for any aviation hazard lighting and the intensity and location of any proposed obstacle lights are yet to be confirmed, *representative images of aviation lighting (installed in August 2020) on turbines at Biala Wind Farm have been included to best illustrate the potential visual appearance of aviation lighting.*

EIS Appendix F 11.2 Aviation Hazard Lighting

The requirement of aviation hazard lighting (AHL) on wind turbines for the proposed Hills of Gold Wind Farm is subject to the advice of the Civil Aviation Safety Authority (CASA). ***It is noted that the turbines proposed for the Hills of Gold Wind Farm will possibly be up to 230m in height and CASA generally recommends night lighting if an obstacle exceeds 150 metres above ground level.*** *Although this is to future detail, the potential CASA requirements for lighting could include: • Two flashing red medium intensity obstacle lights should be provided per turbine where required. • The light fixtures should be mounted sufficiently above the surface of the nacelle so that the lights are not obscured by the rotor hub, and are at a horizontal separation to ensure an unobstructed view of at least one of the lights by a pilot approaching from any direction. • Sufficient individual wind turbines should be lit to indicate the extent of the group of turbines. • The interval between obstacle lighted turbines should not exceed 900m, and the most prominent (highest for the terrain) turbine(s) should be lit. (CASA, 2004)*

Page 5 of the SEARS

The developer must provide a detailed consultation with the following; Civil Aviation Safety Authority (CASA).

3.2 Conclusion

Visitors to the DAG Sheep Station / Nundle / Hanging Rock / Timor value the darkness and night skies as do all residents and believe that this development should be "Rejected" on the Impact of Aviation Night Lighting.

It is misleading to our Community and to our businesses that the proponent fails to confirm that Aviation Lighting will be required, proper consultation with CASA as identified in the SEARS would have equated to non-misleading and transparent information provided to the community and within the EIS.

The site is not suitable for a large-scale wind farm, and that the project is not in the public interest, and should not be approved.

Image: Within the DAG Complex looking towards the Western range end of the proposal and Wind Turbines 1-8. The Night Sky contributes to the value found by visitors to The DAG Sheep Station.

Image: The range dominates the scenery to The DAG Sheep Station and Nundle surrounds.

Image: Bride & Groom on the deck landing of the historic 'Wombrumurra Woolshed', overlooking the Western range end of the proposal and Wind Turbines 1-8.

Built in 1901, the Wombramurra Woolshed is the location for Wedding Ceremonies.

4. IMPAIRMENT OF LANDSCAPE TO BUILD ACCESS ROADS & IMPACTS OF TRANSMISSION LINES

EIS - 6.2.4.2 Upper Hunter Shire Local Environmental Plan 2013

The Upper Hunter Shire Local Environment Plan 2013 (Upper Hunter LEP) is the principal environmental planning instrument regulating land use within the Upper Hunter LGA. The central aims of the Upper Hunter LEP are:

a) "to encourage the proper management, development and conservation of natural and human-made resources in the Upper Hunter ***by protecting, enhancing and conserving the following— i) important agricultural resources, ii) timber, minerals, soil, water and other natural resources, iii) the environmental, scenic and cultural heritage of the Upper Hunter,***

b) ***to protect and conserve— i) soil stability by controlling development in accordance with land capability****, and ii) remnant native vegetation, and iii) water resources, water quality and wetland areas, natural flow patterns and their catchments and buffer areas,*

c) to establish a pattern of broad development zones as a means of— i) separating incompatible uses, and ii) ***minimising the cost and environmental impact of a development****, and iii) maximising efficiency in the provision of utility, transport, retail and other services,*

d) to manage the urban areas of the Upper Hunter by strengthening retail centres and employment opportunities, promoting appropriate tourism development, guiding affordable urban form and providing for the protection of heritage items and precincts,

e) to promote ecologically sustainable urban and rural development and ***control the development of flood liable land,***

f) to secure a future for agriculture by expanding the Upper Hunter's economic base and minimising the loss or fragmentation of productive agricultural land,

g) ***to protect, enhance and provide for biological diversity, including native threatened species, populations and ecological communities, by long-term management and by identifying and protecting habitat corridors and links throughout the Upper Hunter".***

Page 148 - 6.2.4.3 Liverpool Plains Local Environmental Plan 2011

The Liverpool Plains Local Environment Plan 2011 (Liverpool Plains LEP) is the principal environmental planning instrument which regulates land use within the Liverpool Plains LGA. The central aims of the Liverpool Plains LEP are: a) ***"to encourage the proper management of the natural and man-made resources of Liverpool Plains by protecting, enhancing or conserving— i) productive agricultural land, and ii) timber, minerals, soils, water and other natural resources, and iii) areas of significance for nature conservation, and iv) areas of high scenic or recreational value****, and v) places and buildings of archaeological or heritage significance,*

The Clean Energy Best Practice Guidelines; 3.1.2.6 Conservation and recreational uses

The proponent should research the proximity of the site to designated conservation areas, such as state and national parks and local conservation reserves*, as well as sites of international significance. Recreational uses for the land around wind farms should also be investigated such as hiking trails, mountain bike trails, hanggliding/parasailing and use by local clubs (e.g. bird watching, Landcare) to determine whether the wind farm would have an effect on these activities.*

COMPARRISON of Hills Of Gold Wind Farm EIS & Jupiter Wind Farm EIS

HOGWF = 70 Turbines; 420 megawatts; 8316 hectares (ha) Disturbance area 513 ha or 6.16% of the site; Capital Investment $826 million

JUPITER = 54 Turbines; 240 megawatts; 4,135 hectares (ha) Disturbance area 61.81 or 1% of the site; Capital Investment $300 million

4.2 Conclusion

Concerns should be raised about many aspects of the proposed layout design and road access, impacts of the project on existing use and heritage, biodiversity, including Endangered Ecological Communities and threatened species, concerns about potential impacts on land and water resources including flooding control which was included in the SEARS and not covered at all in the EIS and the unacceptable Aviation safety risks.

There many concerns about the noise and traffic impacts of the project, lack of correct data for all roads including; no traffic numbers or correct bus routes identified for Crawney Road; Crawney Road sits on The Bicentennial National Trail, used frequently by travellers on horses; Crawney Road includes E2 Environmental Conservation land.

Dust and noise associated with travelling on Crawney Road would destroy our unique business and the ambience The DAG Sheep Station is widely renowned for.

Misleading data supplied by assuming 60 workers will travel on 3 x buses, on a worst-case scenario it should be assumed 60 workers from multiple trades qualifications and companies will provide their own transport. This would add a further 120 vehicles during Peak hour, pushing the total traffic impact over what is acceptable.

The potential risks associated with bushfires and the ability to effectively deploy aerial firefighting assets in the vicinity of wind turbines is also a risk to human life.

The potential visual impact of the roads, the impact to soil, water, threatened species, environmental damage and danger to human safety within project would be unacceptable in regard to both the public and private domains.

The site is not suitable for a large-scale wind farm and that the project is not in the public interest.

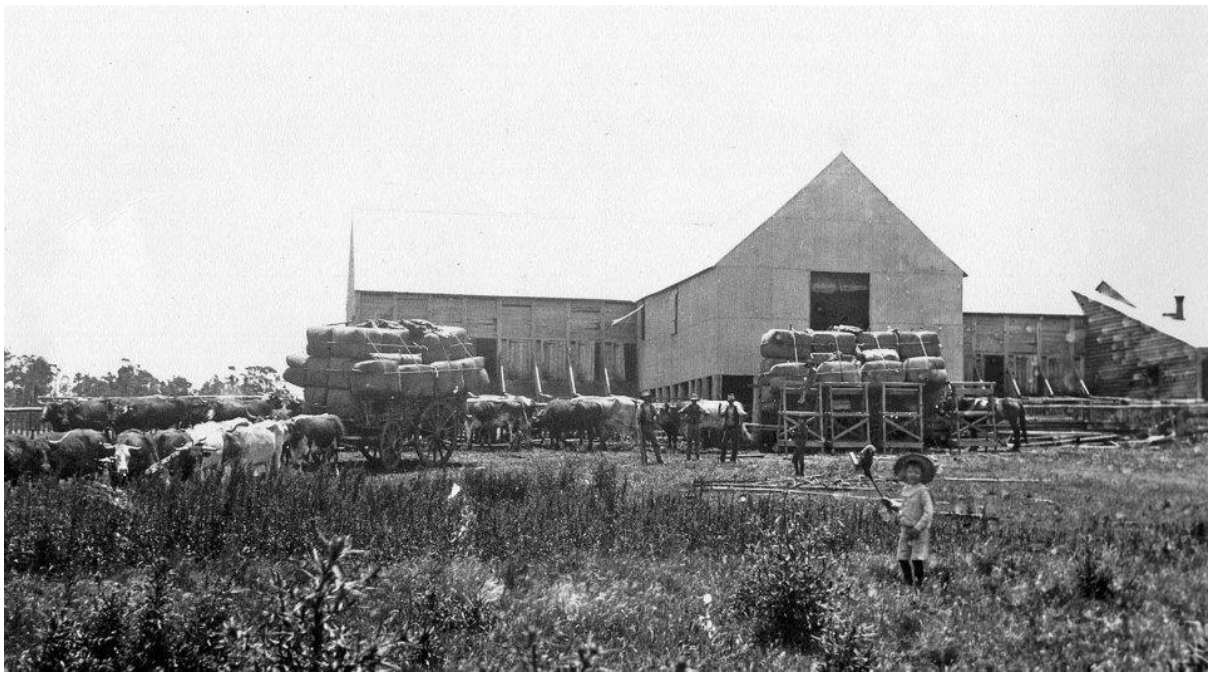


Image: Historic Wombramurra Woolshed, Circa 1906, loading of the wool to be transported to Newcastle via Crawney Pass, on the Crawney Road now part of The Bicentennial National Trail, used frequently by travellers on horses, push bikes, walkers, and includes E2 Environmental Conservation land.

5. SOCIAL & ECONOMIC IMPACTS

The National Wind Farm Commissioners Recommendations;

*8.2.1. State/Territory and local governments should consider assessing proposed wind and solar energy projects on a wider range of criteria (including ability for power output to be transmitted and consumed, **the suitability of a location from a community impact perspective and the degree of community support)** and then prioritising projects for approval or progression accordingly.*

The Clean Energy Best Practice Guidelines;

*Socio-economic **The impact of the proposed wind farm on local infrastructure**, such as health and emergency services, accommodation and community facilities, should be addressed. **In addition, an assessment of the economic impact of the proposal on the local and regional economy** may also be completed.*

The Wind Energy Guidelines for SSD

*5.1 **Importance of consultation Early, meaningful and innovative community consultation, demonstrating an ongoing commitment to providing clear information and ensuring opportunities for genuine input**, is important to delivering good planning outcomes. The Department routinely requires early consultation for a range of SSD projects.*

Earlier and better consultation has a range of benefits for communities and proponents, including: • informing the community about the project and the strategic context; • gathering valuable knowledge from the community; and • establishing relationships between the proponent and the community. It also enables communities to be engaged when there are real opportunities to influence projects and decisions, such as at the siting and design stage.

***Proponents should undertake a comprehensive, detailed and genuine community consultation process throughout the assessment process, including at the siting and pre-lodgement stage.** The process should ensure there is active engagement with communities potentially affected by a wind energy project as early as possible, so that they are sufficiently informed regarding possible impacts and given reasonable opportunities to provide their views on the proposal.*

*Consultation should be aimed at identifying and considering options for eliminating, reducing or otherwise managing impacts**, not merely informing communities on the proposed layout**. Proponents should seek, as far as practicable, to address landowner issues before lodging a DA for an SSD wind energy project. **This should include agreements in relation to land access** and appropriate responses to the concerns and impacts on other potentially affected landowners.*

The National Wind Farm Commissioners Observations;

3.1 Background; Effective community consultation and engagement is essential for large-scale renewable energy projects to gain widespread support and earn the 'social license' to operate within the community. To be effective in community engagement, it is vital to actually 'engage the community' and involve the community wherever possible in the design and execution of programs related to the project.

*The level of community engagement by developers varies widely across projects observed to date. **A key observation is that initial project developers, that intend to 'on-sell' the project to a long-term developer or operator, may not invest sufficient time and resources in community engagement or neighbour relations to be effective. These limited efforts can result in lower levels of community support and more divided communities…"***

The National Wind Farm Commissioners Recommendations

3.2.1 The developer should ideally commence and invest early in community engagement – well before the commencement of the permit approval phase. ***An acquirer of a project still in development should conduct detailed due diligence on the extent and effectiveness of community engagement activities undertaken by the previous developer prior to finalising purchase of the project and be prepared to make the necessary investments in community engagement going forward.***

The National Wind Farm Commissioners Observations;

6.1. Observations ***The design and approval of a proposed wind or solar farm relies heavily on third-party consultants (or 'experts') to prepare a range of reports including assessments related to noise, visual amenity, shadow flicker, aviation, flora and fauna, hydrology, vegetation and various other environmental assessments.***

Experts are selected and paid for by the developer*. The expert reports are typically included with the developer's planning permit submission to the responsible authority when seeking approval for the project. Many of the assessment reports rely on complex calculations or results from predictive computer modelling. These reports also rely on assessing the project against standards that are not always clearly defined.*

The accuracy of the assessment reports and recommendations is therefore highly dependent on the quality and precision of the assumptions used, correct application of calculations, the integrity of computer modelling applications, the accuracy of the data used and the skills of the expert in interpreting the output of the resulting analysis.

The National Wind Farm Commissioners Recommendations

6.2.5. ***Planning approval processes should carefully take into account the advice of independent auditors and/or referral agencies, such as CASA,*** *before deciding on whether to approve a project. Where appropriate, designated authorities (e.g. the relevant road authority), may be deemed to be a statutory referral agency, whereby their advice and recommendations must be adhered to by the responsible planning authority.*

5.2 Conclusion – Social Impacts

The project has generated significant opposition within the community of Nundle / Hanging Rock / Timor and has attracted opposition locally, regionally and Nationally.

Controversy surrounding the project has also attracted widespread media locally, regionally and nationally, with many media personalities and politicians weighing into opposing the choice of this Renewable Energy site.

The majority of residents, the majority Businesses and Landholders from Nundle / Hanging Rock object to the project and have signed a petition, independently certified by a Justice Of The Peace and delivered to NSW Parliament by Kevin Anderson.

The EIS acknowledges supporters of the project consisting of Friends of The Wind Farm group, supported with signs provided by the Australian Wind Alliance, a key advocacy group for the wind energy industry in Australia who has further divided our community by holding supporter only meetings financially supported by WEP and rallied by host landholders and other Associated Dwellings.

The EIS fails to faithfully address the true level of community opposition, controversy and lack of community consent by landholders and residents.

Jamie Chivers , previous Director of Wind Energy Partners Pty Ltd and current Director of Someva Renewables has created much division and confusion within the community, with many community members still uncertain of who is the Proponent, who is a Consultant, who is ultimately responsible for this development.

The on-selling of both the Hills Of Gold Wind Farm proposal and Wind Energy Partners Pty Ltd to the current owners Engie ANZ has only added to the confusion and mistrust.

Engie ANZ have provided no community consultation, choosing instead to divert any concerns, complaints or uncertainties to Someva Renewables Director, Jamie Chivers.

This level or lack of Community Consultation goes against all guidelines and is totally unacceptable.

5.3 Conclusion – Economic Impacts

Economic Benefits

The EIS identifies a range of social and economic benefits for the wider community, including making a positive contribution to the local economy by creating jobs, and providing income to for the associated landowners and providing ongoing funding for community enhancement projects in the local area.

However, the EIS fails to note these social and economic benefits cannot be realised without significant adverse impacts on the environment and the local community, particularly in regard to visual impacts and changing of the existing use of the range.

It should be noted that the number of construction (215) direct jobs, (430) indirect jobs and operational (30) permanent jobs and (50) indirect jobs when operational for this project may be overestimated as they do not appear to be commensurate (and are in the order of double) those associated with other similar wind farm projects assessed by the Department in recent years.

Alternatives

While the NSW Government supports the development of a sustainable wind energy industry in NSW, the EP&A Act provides a merit-based approach to consider the impacts of projects against applicable statutory and policy requirements.

While this project would contribute to renewable energy generation in NSW, there is a suite of renewable projects (including both wind and solar) either approved and not constructed or currently in the assessment process that also have the capacity to provide renewable energy in NSW.

The number of approved solar and wind farms in the region demonstrates that there are solar and wind farm sites in the region that can provide renewable energy, making efficient use of the region's solar and wind resources without significant adverse impacts to the local community, environment or water resources.

COMMUNITY DIVISION & LACK OF COMMUNITY CONSENT

THE LAND

Nundle vows to fight wind farm proposal

Daniel Pedersen 20 Apr 2018, 6 a.m.News

The Northern Daily LEADER

DECEMBER 27 2019 - 5:30AM

Nundle wind farm: 'overwhelming majority' of residents against the proposal

The Northern Daily LEADER

MAY 6 2020 - 5:00PM

Hills of Gold wind farm 'photomontage' does little to allay Nundle opposition

Power project: The view from Hanging Rock Lookout of the proposed Hills of Gold wind farm project outside Nundle. Photo: Wind Energy Partners

The Northern Daily LEADER

MAY 25 2020 - 5:30AM

Nundle Hills of Gold Wind Farm Project divides community opinion |

Proposed wind farm divides Nundle community members

Images: The EIS fails to identify the true controversy and lack of community consent surrounding the project. The Community is already seeing the demise of volunteers and businesses wanting to work together. The Community Enhancement Fund will do nothing to repair the damage done by this proposal and if approved would only further the division and destroy a Tourism based Regional NSW Community.

CONTROVERSIAL WIND FARM & POLITICAL ATTENTION

Images: The proposal by the proponent has always been controversial and would continue to be if approved, the proposal has attracted widespread media locally, regionally and nationally, with many media personalities and politicians weighing into opposing the choice of this Renewable Energy site.

6. Bush Fire Risk & Safety

EIS 13.4.4 Existing Environment; ***The Tamworth Regional Council Bushfire Prone Land mapping identifies the Project Area as bushfire prone land****. The Project Area is located along the upper ridgeline that is exposed to prevailing wind directions.* ***These ridgelines and plateaus are flanked by very steep rugged terrain,*** *and a mixtures of cleared farmland and dry sclerophyll forests. Based on the information provided in Appendix J, the greatest hazard already present in the landscape is a combination of undesirable fire weather (ie. Hot and dry winds and low humidity during summer) and* ***the potential for a fire to spread from the adjacent properties and the National Parks' estates*** *towards farm assets in the surrounding area. Fire under the influence of wind may travel upslope very fast, reaching these assets before firefighters can attend the scene.* ***This is noted to be an existing hazard and is not directly influenced by the proposed wind farm development****.*

EIS 13.4.5.1 Summary of Bushfire Risk Factors; ***The risk that the Project itself will cause a fire is minimal.*** *While the PBP 2019 specifies an asset protection zone (APZ) of 10 m for wind farm assets,* ***given the steep slopes and existing fire history within the adjacent National Parks' estates****, this risk assessment is also undertaken with due consideration of the potential flame zone that may impact on the Project infrastructure.*

EIS 13.4.7 Conclusion; *The risk that the wind farm itself will cause a fire is minimal although it is recognised that* ***the proposed development is located within a bushfire prone landscape****, and that despite the mitigation measures and treatments that are put in place, some bushfire risk will always remain. It is also recognised that some of the proposed wind farm infrastructure, including WTG, the transmission line and the main access road will be located within the flame zone. It is therefore important that a Bushfire Emergency Management and Operations Plan is prepared in conjunction with relevant stakeholders, including NSW RFS, NSW Fire and Rescue, NPWS, Forestry Corporation of NSW (FCNSW), adjoining property owners and employees.*

In the event that a fire does breach any containment lines and threatens the wind farm assets, it is possible that the wind farm infrastructure will sustain direct flame contact and ***that firefighting will require aerial support.***

7.2 Conclusion

The EIS mentions the Project Area as 'bushfire prone land' and it should be noted that Hills Of Gold Preservation first brought this to the attention of the Government when the proponents applied for EPBC and this very important details was left out.

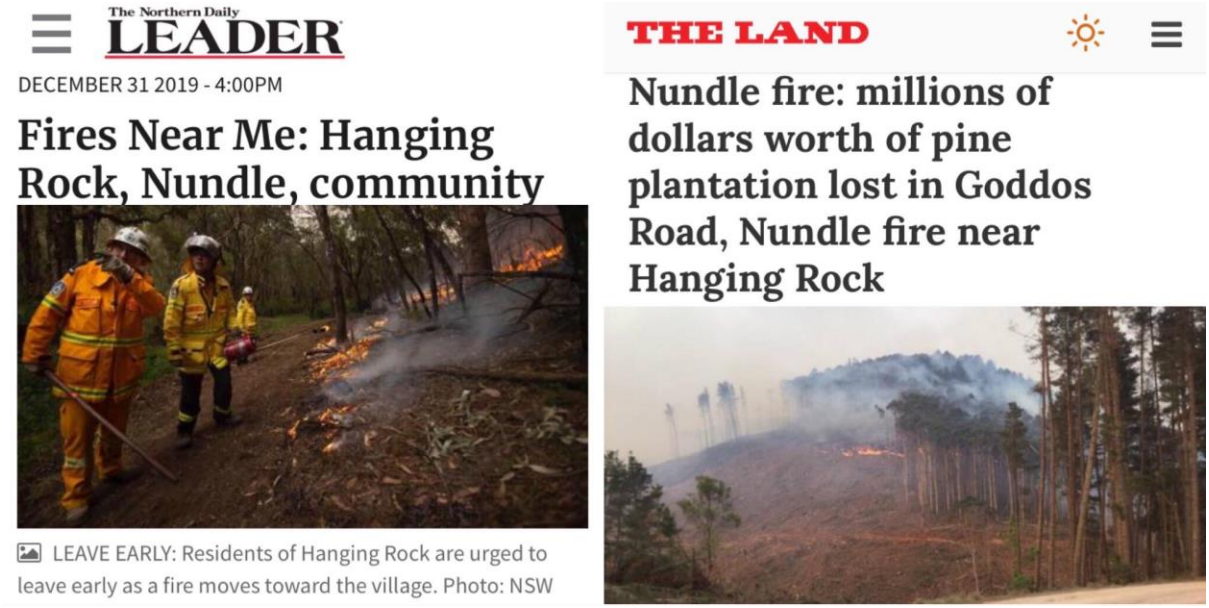
Although the EIS mentions the need to protect the proposal's assets, the need to protect human life, stock and properties during increased bush fires and longer, hotter bush fire seasons, through aerial support must take precedence over a commercial venture.

The inability to deploy fixed wing support or reduced visibility due to smoke is a risk factor for collision with Wind Turbines & Transmission Lines to not only aerial support but human life.

The EIS fails to identify the Nundle Sports Ground as a landing pad and refuelling for Helicopters and the exclusion of fixed wing runways located within the development corridor that will become obsolete.

REDUCED VISIBILITY & INNABILITY TO DEPLOY FIXED WING AERIAL SUPPORT

Images: Forestry Corporation NSW; Firefight: **The RFS air tanker drops retardant on the Goddos Road blaze. These images during the Hanging Rock fire clearly show reduced visibility would make aerial deployment unsafe and an unacceptable risk to pilots and allow the fire to spread contributing to unacceptable risks to human life in Nundle / Hanging Rock / Crawney / Timor and surrounds**



The Northern Daily LEADER

DECEMBER 31 2019 - 4:00PM

Fires Near Me: Hanging Rock, Nundle, community

LEAVE EARLY: Residents of Hanging Rock are urged to leave early as a fire moves toward the village. Photo: NSW

THE LAND

Nundle fire: millions of dollars worth of pine plantation lost in Goddos Road, Nundle fire near Hanging Rock

Images: The bush fires that led to financial lost to the NSW Forestry and a risk to human life. The EIS talks about fires started by lightning strikes, but as I write this submission today Monday 25th January, there is a current 'Out Of Control' grass fire located on Crawney Road.

7. Tourism VS Renewable Energy

NSW Visitor Economy Strategy 2030 Introduction

Gladys Berejiklian Premier of NSW: *The visitor economy is one of NSW's major exports, contributing $38 billion to our Gross State Product and employing almost 300,000 people.* ***The presence of visitors adds to the State's prosperity and liveability, enhancing the vibrancy of our public spaces and the lifestyle of local residents.***

Stuart Ayres Minister for Jobs, Investment, Tourism and Western Sydney: *"As 2019 drew to a close, no one foresaw the disruption of the visitor economy that would result from the catastrophic bushfires over summer and the spread of COVID-19. Following years of drought in some parts of NSW, these events dealt the visitor economy a crippling blow…"*

*"**At the time of writing in late 2020, the visitor economy of NSW is deep in crisis** and the roadmap to 2030 is neither linear nor tracking as originally expected. This new and uncertain world requires a fresh, new strategy to aid recovery in the near term and turbocharge visitor economy growth when travel patterns resume their normal rhythm…"*

"These goals are both challenging and aspirational but entirely achievable if Government and industry work together in a new spirit of partnership to chart a shared future. ***Key to this will be the establishment of a new Visitor Economy Senior Officers Group which will be led by Destination NSW to ensure the visitor economy is central to decision making within government and that it grows in a coordinated and sustainable way…"***

''Regional NSW will be key to the future of the state's visitor economy and a focus of the strategy…"

NSW Visitor Economy Strategy 2030; Strategic pillar 3. Showcase our strengths

3.08 ***Finalise and deliver the NSW Nature-based Tourism Strategy****› Department of Planning, Industry and Environment › Department of Regional NSW › NPWS 2021-2030*

3.09 ***Grow the eco-wellbeing, eco-tourism and volunteer tourism sectors*** *through industry development activities and product development support. Destination Networks › Department of Planning, Industry and Environment › Department of Regional NSW › NPWS 2021-2030*

(Taken from) A 20-Year Economic Vision for Regional NSW July 2018

"Tourism rates amongst the highest growth engine industries, placing Nundle in a prime position to capitalise on both Regional population growth to the City of Tamworth and the close proximity to the Hunter market".

Tourism; Regional NSW's hospitality and diverse natural beauty – including outback, country, alpine, coastal, island and subtropical landscapes – draw more visitors from Australia and overseas every year. Each year from 2012 to 2017, overnight visitor numbers to regional NSW grew by 5 per cent. Altogether, overnight visitors to regional NSW spent more than $12.4 billion in the year to December 2017.7 More than 81,000 regional jobs – 9 per cent – support tourism.

TAMWORTH KEYCHANGE 2017 - 2027 COMMUNITY STRATEGIC PLAN

"LOVE WHERE YOU LIVE! Your voice is the key to our region's future.

Some of the community feedback includes: ***• The best things about our Region are the natural environment and waterways,*** *quality sporting facilities, a growing equine industry, and the tourism value of our Region".*

(Page 12: Photo of John, Belinda, Brooke & Jade Krsulja at the DAG Sheep Station)

Measure of success - F2.1 ***Protect our natural environment • Planning and operational processes ensure consideration of biosecurity and natural environmental impacts***

A region of opportunity and prosperity, a place to call home

A SPIRIT OF COMMUNITY Active healthy communities Promote our Region's heritage, character and culture Safe places to live, work, play and visit.

A REGION FOR THE FUTURE Sound asset and land planning to facilitate future community needs Promote sustainable living to protect and support our environment, heritage and resources.

7.2 Conclusion

To suggest existing Tourism & the Hills Of Gold Wind Farm can work together in a Site such as Nundle goes against everything the NSW Government has worked towards establishing.

The need to protect Nundle's diverse natural beauty from Industrialised landscape with a ridgeline dominated by Wind Turbines is the very reason for establishing Renewable Energy Zones. These REZ should not be shifted towards or compromise established NSW Tourism Destination assets or Environmental Sensitive areas of Soil and Water resources because of commercial and economic gain sought by Developers.

The National Wind Farm Guidelines and NSW Government have recommendations on Ridgeline development and the need for community consent. The lack of community consent within the villages of Nundle and Hanging Rock has caused community division and with the overwhelming opposition from Business owners, Lifestyle landholders, Agricultural Businesses and residents shows the very need for Developers to uphold the balance between Renewable Energy and Social Acceptance, including existing Tourism.

The future of Renewables working with Tourism and Agriculture will see the need for a 'prospector's licence' approach, with Tourism Zones, Agricultural Zones and Environmental Zones off limits, until then the proposed site for the Hills Of Gold Wind Farm is not suitable for a large-scale wind farm, and that the project is not in the public interest, and should not be approved.

Image: John, Belinda, Brooke & Jade Krsulja, family business owners of The DAG Sheep Station, currently used in Tamworth Keychange 2017 – 2027 Community Strategic Plan.

<u>A final word;</u> We have called The DAG Sheep Station our home for nearly 14years, during this time we have shared our place with 1000's of visitors and friends. The last 3 years have been some of the toughest in my business and family life, which I attribute mostly to this proposed Hills Of Gold Wind Farm.

I truly believe in choosing my battles wisely, just as developers should choose their Renewable Energy locations wisely and in this case the developers have failed.