Independent Planning Commission

11th February 2024

TO WHOM IT MAY CONCERN

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

I object to the Department of Planning and Environment's (DPE) consent for approval of the Hills of Gold Wind Farm (HOG WF), proposed by Engie, and disagree with many of the assessments within its Report.

I believe that the DPE Assessment Report published December 2023 ("The Report") has misjudged the balance of costs versus benefits, is not in the public interest and is environmentally unsound due to reasons outlined within this submission.

REASON FOR OBJECTION:

I have reviewed The Report and foresee extensive negative environmental impacts that far outweigh any economic benefits regionally. My reasons for objecting to this project are as follows;

Biodiversity impacts

1. The loss of 190.54 hectares of native vegetation comprising approximately 45% native vegetation is unacceptable. This includes the removal of **Critically Endangered Communities** such as the White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland. Fauna such as the identified populations of koala and spotted quolls would suffer from the disruption of the vegetation corridors particularly through to the adjacent National Parks.

2. Vegetation clearing and construction of any wind turbines in the project area is **unacceptable** due to the high risk of bird and bat strike by the turbine blades while foraging and migrating between roosts and breeding sites. Large Bent-wing Bat populations migrate regionally between significant roost sites at Barrington Cave (Tomalla), Main Cave (Timor); Barry Cave (Barry Station) and Crawney Pass Caves. Barrington Cave has in the past been observed to have hundreds to thousands (numbers are seasonal as they migrate between sites) of individual Large Bent-wing Bats (Rutledge in Rutledge, J. 2003; Helman in Rutledge, M. 2002; Scott in Rutledge, M. 2001).

Blade strike

1. The AnaBat bat detector, the most trusted tool for recording bat movements for environmental assessments has limitations at distance. The rotor sweep area for the turbines is 58m to 232m above ground level, whereas the AnaBat detectors can typically record bat sweeps at a 30m distance and sometimes up to 100m depending on model, species of bat and placement of the unit.
   https://static.webshopapp.com/shops/039297/files/023161359/anabat-express-user-manual-version-14.pdf

   The Report (page 119) assumes low levels of microbat activity within the range of rotor blades for all species due to flawed evidence that does not take in account the limitations of the equipment. There is a substantial and significant lack of understanding of the true risk of harm to the microbat population in and around the site.

2. The impact upon threatened bat species such as the Eastern False Pipistrelle, Eastern Coastal Free-tailed Bat and Yellow-bellied Sheathtail-bat would be substantial due to the loss of suitable habitat. The amended application has failed to reduce this loss significantly.

   The Yellow-bellied Sheathtail-bat and Eastern False Pipistrelle relies on mature hollow-bearing trees offered by the native forest woodlands along those ridges. Likewise, the Eastern Coastal Free-tailed Bat relies on mature trees with hollows or loose bark to roost under. Loss of suitable habitat is unacceptable to these vulnerable species.

Soils and Erosion

1. I am concerned that the Applicant has no detailed plans to mitigate erosion, and soil displacement into waterways and downstream karst environments. Creeks and drainage lines actively flow into the Isis River and into the Timor Karst system that contains a network of over 80 caves adjacent to the Isis River. 8 wind turbines each with a 500-900 cubic meters of estimated soil/rock displacement plus the construction of ridge top internal access roads and the construction of the BESS & Substation, will displace tonnes of soil into this karst river catchment.

Access

1. I particularly object to the newly constructed Teamsters Rest access road across crown land from the Crawney-Nundle Road along the northern edge of the Crawney Karst. There are caves located in the perennial creek north of Limestone Oaky Creek and have two gullies feeding into this creek-line that are directly affected by the internal road construction.

Karst and Cave Impacts

1. I am concerned that clearing and road construction will cause erosion leading to the transfer of silt downstream into the caves. Caves are important sites supporting ecological communities vulnerable to this type of development.

   Two karst areas are present downstream of the proposed development. The Crawney Pass Caves immediately adjacent to the development. Seven caves are currently known to exist here in this drainage gully. The caves contain many features of significant geoheritage value, such as speleothems (flowstones, stalactites and stalagmites), vast tree roots have grown into the caves providing habitat for cave-

adapted faunas, roosting avens for bats, and fossil bone material which is yet to be studied scientifically.

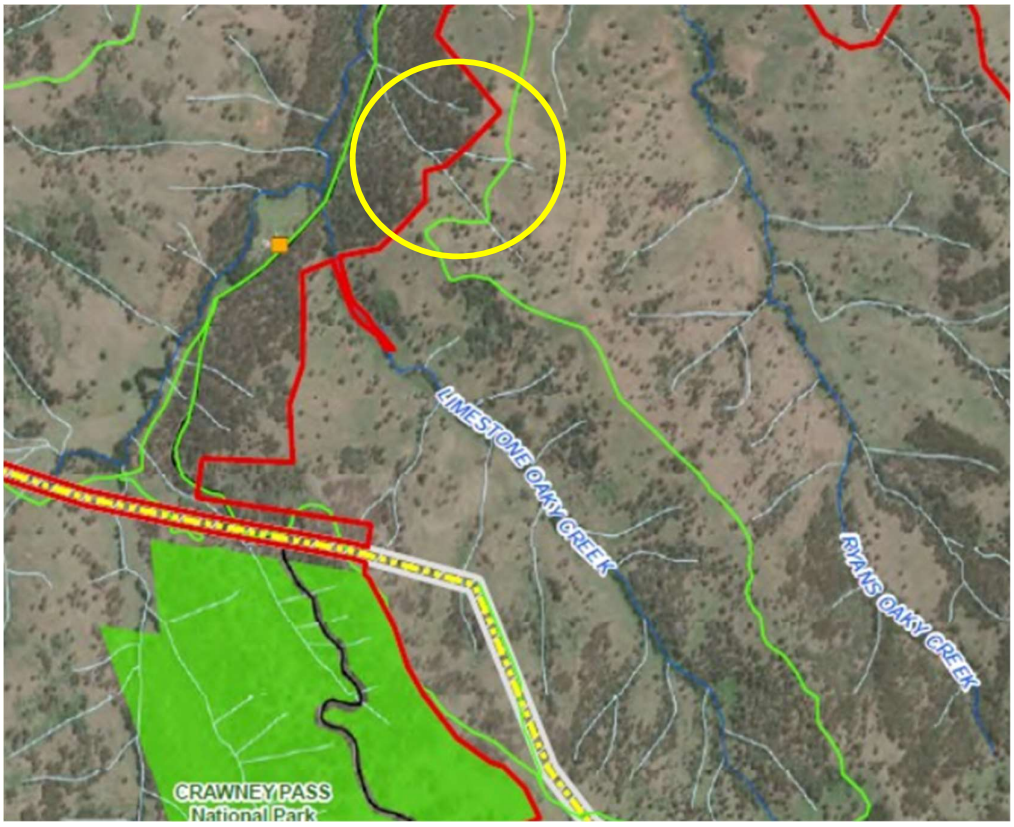

Figure 1- Creek lines containing the Crawney Caves

Further to the south are the Timor Caves in the Isis River catchment downstream of the proposed development. Over 80 caves are known, many have high biodiversity values such as having a rich invertebrate habitat, bat populations, significant geoheritage values with over a hundred-year history of visitation and a substantial source of precious groundwater. All of these values are under threat from this proposed development.

In closing, I object to this development on the many grounds as discussed.

References

Helman, M. in Rutledge, M. 2002, (Ed.) Gloucester and Barrington Caves in *Newcaves Chronicles, No. 18*, Newcastle & Hunter Valley Speleological Society.

Rutledge, J. in Rutledge, J. 2003, (Ed.) Barrington Cave on the Pigna Barney Karst in *Newcaves Chronicles, No. 20*, Newcastle & Hunter Valley Speleological Society.

Scott, D. in Rutledge, M. 2001, (Ed.) Barry Cave (BA1) Barry, NSW in *Newcaves Chronicles, No. 17*, Newcastle & Hunter Valley Speleological Society.