From: Melissa Hadley
To: Do-Not-Reply IPCN Submissions Mailbox
Cc: [redacted]
Subject: SSD-9679: Hills of Gold Wind Farm Submissions
Date: Monday, 15 July 2024 11:24:30 AM
Attachments: image001.png
NHVSS Submission July 2024.pdf

Dear Members of the Panel,

Thank you for providing us with the opportunity to submit our response regarding SSD-9679. The Newcastle & Hunter Valley Speleological Society Inc (NHVSS) maintains its strong opposition to the construction of the Hills of Gold Windfarm within this region due to its significant environmental impacts.

Attached to this email, you will find our comprehensive response addressing the latest material submitted. We appreciate your attention to our concerns and look forward to your careful consideration of our submission.

Thankfully,

Melissa Hadley

NHVSS President
Email: [redacted]
Mobile: [redacted]

NEWCASTLE AND HUNTER VALLEY SPELEOLOGICAL SOCIETY INC.
P.O. Box 15
Broadmeadow 2292
N.S.W. AUSTRALIA

15th July, 2024

Re: SSD-9679: Hills of Gold Wind Farm Submissions
Objection to the Proposed Development

On behalf of The Newcastle & Hunter Valley Speleological Society Inc (NHVSS), we strongly reject the latest assessment by the Department of Planning Housing and Infrastructure (DPHI) that reinstates 15 of the 17 non-compliant turbines, making the Hills of Gold Windfarm a 62-turbine project. This reversal contradicts the DPHI's Final Assessment Report to the IPC from February 2024, which recommended a windfarm with only 47 turbines. The DPHI's February 2024 assessment should be reinstated to align with the community's and environmental needs.

Additionally, we strongly object to the DPHI's agreement to grant Engie, a private commercial multinational company, the right to a Voluntary Land Acquisition imposed on a private landowner's property (DAD 01). This sets a dangerous precedent by allowing land acquisition imposed on a private landholder by a private entity, undermining legal dwelling entitlements and approved development applications in NSW.

We urge the Independent Planning Commission (IPC) to reread our previous submission from February 2024 and note that all our objections still remain valid. The IPC must consider the cumulative impact on the environment, particularly regarding the Bird and Bat Adaptive Management Plan (BBAMP), and ensure rigorous pre-approval requirements to protect endangered species and the local ecosystem.

Removal of Turbine T28 and Consideration for Further Turbine Removals
We are in strong opposition to the reinstatement of Turbine T28 at the Hills of Gold Windfarm and to advocate for the removal of additional turbines to protect the region's bat and bird populations. While the removal of Turbine T24 has been accepted, the decision to reinstate T28, and the lack of consideration for further turbine removals, pose significant environmental risks, particularly to endangered species and their habitats.

Impact on Endangered Ecological Communities
The construction of Turbine T28 requires the clearing of approximately 1.5 hectares of an endangered ecological community in good condition, including habitats critical to the survival of various threatened species such as the Koala, Barking Owl, and Large-eared Pied Bat. The Department's assertion that the benefits of the project outweigh the minor biodiversity impacts is flawed and underestimates the cumulative effect on these species' habitats.

Bat Mortality Due to Wind Turbines
Studies have shown that wind turbines are a significant threat to bat populations, not only through direct collisions but also through barotrauma. Barotrauma occurs when bats experience rapid changes in air pressure near the spinning blades, causing fatal internal injuries. The study by Baerwald et al. (2008) highlights that many bats die without direct contact with the blades, raising concerns about the accuracy of mortality counts and the true impact on bat populations.

Horn et al. (2008) observed that migratory tree-roosting bats are attracted to wind turbines, often foraging near operating turbines. Their findings indicate that bats are at higher risk of fatality on nights with low wind speeds when blade rotational speed is lower. This suggests that turbine

operations, particularly in areas with significant bat populations, should be scrutinized closely to prevent substantial ecological harm.

Inadequate Bat Population Studies and the Need for Further Turbine Removals
The acoustic bat study conducted for the Hills of Gold Windfarm (HoGWF) is grossly inadequate. The study's limited scope, both in duration and location, fails to account for the extensive foraging ranges and behaviors of local bat populations. Bats often hunt at dusk without using sonar, relying on their excellent eyesight. Observations indicate that the regional Large Bent-wing Bat populations, and their critical flight paths between roost sites such as Barrington Cave, Main Cave, Barry Cave, and Crawney Pass Caves, have been overlooked. Protecting these flight paths is essential to conserving breeding behaviors and maintaining bat populations.

Given the significant bat populations within the nightly foraging range of the proposed turbines, it is imperative that the Commission consider removing additional turbines beyond T28. The cumulative impact of multiple turbines on bat mortality cannot be overstated. The foraging and migratory flight paths of these bats are critical to their survival and must be preserved to maintain healthy bat populations. The project design must prioritize the protection of these flight paths and consider the broader ecological impact of turbine placements.

Bat and Bird Monitoring program
While the recommendations from the Independent Planning Commission (IPC) outline the necessity of the Bird and Bat Adaptive Management Plan (BBAMP) for the Hills of Gold Windfarm, we believe the proposed timeframe for its implementation is insufficient and does not adequately address the critical nature of the plan for protecting endangered bird and bat species in the area.

Inadequate Timing for Plan Preparation
The recommendation that the BBAMP be prepared prior to the commissioning of any wind turbines is too late in the project timeline. This plan should be developed, reviewed, and approved before any approval of the windfarm itself is granted. The Applicant's history of delays and insufficient responses to the IPC and community concerns raises significant doubts about their commitment to genuine environmental protection and transparency.

Applicant's History of Poor Engagement
Throughout the entire approval process, the Applicant has consistently failed to engage with the IPC and the community in a timely and mutually acceptable manner. There have been numerous instances where the Applicant has delayed responses, provided incomplete information, or only complied when explicitly directed by the IPC. This pattern of behaviour indicates a lack of good faith and raises concerns about their ability to effectively implement and adhere to the BBAMP.

Critical Importance of Pre-Approval Implementation
The BBAMP is vital for the survival of many endangered and at-risk bird and bat species in the area. The Environmental Impact Statement (EIS) prepared by the Applicant has already demonstrated significant deficiencies in accurately capturing the current state of the environment. Given this, it is imperative that the BBAMP is not only thorough but also subjected to rigorous scrutiny before any development proceeds.

Given the Applicant's track record and the critical nature of the BBAMP, it is essential that this plan is finalized and approved before any approval for the windfarm is granted. This will ensure that all necessary measures are in place and verified by experts before any construction begins, thereby protecting the endangered species from the outset.

Wind Farm Location Between National Parks and Critical Habitats
Placing a wind farm between Crawney Pass National Park and Ben Halls Gap Nature Reserve, which includes the Critically Endangered Ben Halls Gap Sphagnum Moss Cool Temperate Rainforest, raises significant environmental concerns. These national parks are vital ecosystems that support a wide range of native flora and fauna, including endangered species. The proximity of industrial-scale infrastructure like wind turbines poses a direct threat to the integrity of these protected areas. The potential impacts on wildlife corridors, habitat fragmentation, and disturbance

to sensitive species underscore the need for a thorough assessment and mitigation strategy that prioritizes conservation over development.

Impact of Undesigned Internal Roads on Steep Gradient Land
The proposed wind farm lacks detailed design considerations for internal roads on steep gradient land, which increases the risk of erosion, sedimentation, and mass movement. These environmental hazards not only threaten the stability of the project infrastructure but also pose significant risks to surrounding ecosystems and watercourses. The absence of adequate mitigation measures could lead to substantial environmental degradation and associated financial liabilities. It is crucial that comprehensive assessments and robust mitigation strategies are implemented to safeguard against these potential impacts, ensuring long-term environmental sustainability.

Unanswered Concerns from Soil Scientist's Report
Soil scientist Greg Chapman's report has highlighted critical concerns regarding the lack of detailed design to mitigate erosion, sedimentation, and mass movement risks associated with the wind farm project. Despite these warnings, the Department of Planning Housing and Infrastructure (DPHI) has failed to adequately address these major environmental impacts. The potential consequences of inadequate mitigation not only threaten local ecosystems and water quality but also carry substantial financial risks. The DPHI's oversight in addressing these concerns raises doubts about the project's readiness and its ability to adhere to environmental standards.

Disregard for 2016 Wind Visual and Noise Guidelines
The failure to uphold the 2016 wind visual and noise guidelines raises concerns about the broader impacts of the wind farm on local wildlife. While these guidelines are primarily intended to protect human communities from visual and noise disturbances, their disregard suggests a broader pattern of insufficient consideration for environmental impacts. This disregard undermines confidence in the project's adherence to regulatory standards aimed at safeguarding both human and animal welfare.

Yours faithfully

Melissa Hadley
President NHVSS

References

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